

Brawley Wash Watershed Plan and Environmental Assessment

Appendix A – Comments and Responses

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(Rev. 07/13/2026)**

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1	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Cover Page	Cover Page	The document exceeds the 75 page limit specified by NEPA for an EA Recommend reducing page count to comply with the NEPA page limit specified for EA's. Reference: 42 USC 4336 Sec 107 (e) https://www.govinfo.gov/content/pkg/COMPS-10352/pdf/COMPS-10352.pdf	NRCS	NWMC	Y	The Plan-EA has been revised to comply with the NEPA guideline of 75 page limit.	S. Cihelka	J. Alwin
2	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Abstract - Non Discrimination Statement	i (.docx p. i)	There have been updates to the non-discrimination statement. Check official website for any updates prior to finalizing the watershed agreement. https://www.usda.gov/non-discrimination-statement	NRCS	NWMC	Y	Non-Discrimination Statement has been revised in Plan-EA: In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, religion, sex, disability, age, marital status, family/parental status, income derived from a public assistance program, political beliefs, or reprisal or retaliation for prior civil rights activity, in any program or activity conducted or funded by USDA (not all bases apply to all programs). Remedies and complaint filing deadlines vary by program or incident. Persons with disabilities who require alternative means of communication for program information (e.g., Braille, large print, audiotape, American Sign Language, etc.) should contact the State or local Agency that administers the program or contact USDA through the Telecommunications Relay Service at 711 (voice and TTY). Additionally, program information may be made available in languages other than English. To file a program discrimination complaint, complete the USDA Program Discrimination Complaint Form, AD-3027, found online at How to File a Program Discrimination Complaint and at any USDA office or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by: (1) mail: U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov . USDA is an equal opportunity provider, employer, and lender.	S. Cihelka	J. Alwin
3	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Watershed Agreement - Term	ii (.docx p. 3)	The terms of the watershed agreement must reflect the correct period of analysis. The period of analysis must include the evaluated life of the project plus the implementation period. The plan indicated that the project would be installed within 2 years. Per regulation 7 CFR 622, the sponsor must implement the project as planned. The term of the Watershed Agreement should therefore include the implementation period plus the evaluation period, which is the period of analysis. The term is for the installation period plus evaluated life. Therefore, if it takes 2 years for installation / implementation and the project has an evaluated life 50 years, of the term of the agreement would be for 52 years. Recommend changing to reflect the period of analysis by changing the term to include the correct project life installation period. Reference: 2014 390 NWPM 501.12 C	NRCS	NWMC	Y	The evaluated life of the project is revised to equal 50 years in the Plan-EA document text. The period of analysis is 52 years which includes the evaluated life of the project plus the implementation period.	K. Harpankar (GFT)	S.Cihelka
4	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Watershed Agreement - Real Property	ii (.docx p. 3)	The format and wording provided in this exhibit must be used except for sections not applicable to the planned watershed project. The language in the watershed agreement has been altered and does not include the official language approved by the Office of General Council for Real Property. Recommend adding "The sponsors agrees that all land acquired for measures, other than land treatment practices, with financial or credit assistance under this agreement will not be sold or otherwise disposed of for the evaluated life of the project except to a public agency which will continue to maintain and operate the development in accordance with the Operation and Maintenance Agreement" to comply with policy requirements. Reference: 2014 390 NWPM 506.30 B	NRCS	NWMC	Y	Land acquisition will not be required to complete the Preferred Alternative. Alternatives proposed via the Plan-EA, all land is owned and operated by the Cooperating Agency (City of Tucson) or the Sponsor. The City of Tucson has an executed an IGA with the Sponsor. Brawley Wash Watershed Plan-EA is not a Watershed Protection or Restoration "purpose", the language in Watershed Agreement has been altered to conform to the Project's objective of flood prevention and mitigation. Recommended text will be added to the language without exception.	J. Alwin/ E. Demaria (District)	S. Cihelka
5	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Watershed Agreement - Cost Share Table (PA2A1) - Mitigation	iii (.docx p. 4)	The watershed plan doesn't clearly explain how the need for mitigation will be met. Therefore, it is not clear enough to determine if cost sharing for mitigation is allowed for the Watershed Protection authorized purpose. Cost-share for mitigation for Flood Prevention is limited to costs for cultural resource protection and other mitigation that may be associated with construction costs. Recommend determining if PL 83-566 funding sources can be used for cost-share for mitigation. Reference: 2014 390 NWPM506.50 K (2) (XX)	NRCS	NWMC	Y	A footnote on mitigation costs has been added to the table. Mitigation costs include expenditures to cover cultural resource mitigation for archaeological sites found in the Tucker Road and Tortuga Ranch problem areas. Also included are costs for biological mitigation including preconstruction surveys and as needed relocation of burrowing owls. The mitigation cost used includes cultural resource and wildlife mitigation cost and thus PL 83-566 funding can be used for cost share for mitigation.	K. Harpankar (GFT)	S. Cihelka
6	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Watershed Agreement - Cost Share Table (PA6A3) - Mitigation	iii (.docx p. 4)	See Comment above in reference to cost-share for mitigation. (Reference: Comment 191)	NRCS	NWMC	Y	Mitigation costs include expenditures to cover cultural resource mitigation for archaeological sites found in the Tucker Road and Tortuga Ranch problem areas. Also included are costs for biological mitigation including preconstruction surveys and as needed relocation of burrowing owls. The mitigation cost used includes cultural resource and wildlife mitigation cost and thus PL 83-566 funding can be used for cost share for mitigation.	K. Harpankar (GFT)	S. Cihelka
7	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Watershed Agreement - Cost Share Table (PA7A1) - Mitigation	iv (.docx p. 5)	See Comment above in reference to cost-share for mitigation. (Reference: Comment 191)	NRCS	NWMC	Y	See responses for Comments 191 and 192.	K. Harpankar (GFT)	S.Cihelka
8	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	Table of Contents - List of Tables	xiii (.docx p. 26)	See comments about numbering of tables and figures and correctly identifying the appropriate location of same as well as congruently organizing the presentation of the information telling the "planning story" across relevant disciplines.	NRCS	NWMC	Y	Table and Figure references for Plan-EA and Appendices will be revised for clarification.	S. Cihelka	J. Alwin
9	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	OMB Mitigation, Minimization, and Avoidance Measures - Cultural Resources	xviii (.docx p. 19)	Unclear how the sponsor will avoid historic properties. NRCS AZ's finding of no historic properties affected was made based on the avoidance of effects to NRHP-eligible sites, per 36 CFR 800.4(d)(1). Per 36 CFR 800.11, for any reviewer to understand the basis of NRCS AZ's Section 106 finding of effect, NRCS AZ must ensure the finding is supported by sufficient documentation in the Plan-EA and its appendices. The NWMC recommends clearly describing what specifically the sponsor will do to avoid historic properties, including avoidance buffers or temporary fencing. Reference: 36 CFR 800.4(d)(1); 36 CFR 800.11	NRCS	NWMC	Y	Added statement that avoidance will be accomplished through site-specific project design and installation of avoidance measures, such as fencing, during construction.	J. Hesse (SWCA)	S.Cihelka

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10	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Mitigation, Minimization, and Avoidance Measures - Cultural Resources	xviii (.docx p. 19)	Unclear if the cited inadvertent Discovery Plan for post-review discoveries of cultural resources and human remains will be compliant with the post-review discovery process under 36 CR 800.13 and relevant laws pertaining to human remains discoveries (e.g., State of Arizona laws). The NWMCM recommends that the Inadvertent Discovery Plan be compliant with 36 CFR 800.13 and relevant laws pertaining to human remains discoveries. Reference: 36 CFR 800.13	NRCS	NWMC	Y	Added statement that post-review discovery protocol would be compliant with 36 CFR 800.13 and ARS 41-844 and 41-865, Arizona's burial discovery laws.	J. Hesse (SWCA)	S. Chetka
11	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Alternatives Analyzed	(.docx p. 21)	The numbering of the alternatives seems problematic and has potential for confusion without a clear understanding of the framework and intent of the analysis. It seems that multiple sites were considered and potential measures considered that can be formulated into alternatives. This approach is more of a programmatic approach (multiple sites considered with a menu of potential measures to be considered at a respective site as applicable to a given site). For a programmatic type of approach, each site would potentially comprise of solutions (measures) that were deemed least cost amongst numerous measures analyzed that could potentially be considered within the entire watershed at various sites with the selection based upon what measures are relevant and applicable for a particular site. A project type of approach would require formulating various alternatives for each site and selecting the most cost-effective alternative for a particular site, and combining all site selected alternatives into the preferred action for the watershed plan. However, according to section 5, Tortuga Ranch seems to have only one action alternative considered. The plan seems to be a combination of both method types. Also, upon reviewing table 22, these "alternatives" seem more as measures and not alternatives. The planning methodology should follow determining potential measures, screening measures, and the remaining measures grouped into alternatives. The alternatives should be presented clearing indicating the composition of a respective alternative. Recommend rectifying by laying out the planning process from the perspective of a programmatic approach or alternatively ensuring each site has more than one alternative that are evaluated with analysis leading to decision of alternative chosen for each site. Also, conduct incremental analysis as applicable and appropriate. Reference: NWP 501.42; DM 9500-013 Section 6 & Section 7; OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	The area of Brawley Wash Watershed is extensive, spanning over 198,000-acres, the numbering of alternatives was developed to separate the study area into subsets during the Sponsor/Stakeholder Feasibility meeting held August 24, 2022. Adjusting the Alternative numbering would raise more issues in historical administrative records and documents due to the extended length of the project. We believe we included only alternatives that provide combined beneficial effects, compared beneficial effects vs adverse, and performed incremental analysis where appropriate. The incremental analysis is captured on the scalable components but does not isolate every feature of the preferred alternative. Results of the incremental analysis is also included in the appendices and not explicitly described in the Alternatives chapter. Alternatives contained one or more measures that were examined and selected for each alternative in cooperation with the Sponsor, NRCS-AZ, and Stakeholders through multiple workshops. Alternatives were created to reduce the number of modeling scenarios and maximize the potential benefits in alignment with the federal and local objectives.	S. Chetka	B. Myers
12	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Alternatives Analyzed (PAZA1)	xxii (.docx p. 23)	Annual Operations & Maintenance costs have not been included in the OMB Fact sheet for any of the site alternatives Recommend see other comment in Appendix D. Reference: NWP 606.17	NRCS	NWMC	Y	Under current conditions, the City of Tucson incurs approximately \$360,000 annually in land management cost for invasive species management. This cost is comprised of \$1,000 at P2A1, \$120,000 at P6A3, and \$239,000 at P7A1. Under proposed conditions, it is possible that Pima County would assume responsibility for annual O&M/land management. However, no new O&M cost is generated by the implementation of Preferred Alternative. Because there is no difference between existing and proposed conditions, O&M cost have not been shown here. The alternatives implemented with this project are not typical construction projects. The preferred project alternatives are restoration options with natural infrastructure components incorporated in one of the preferred alternatives. The alternatives restore abandoned agricultural land. The O&M costs are incurred for invasive species management and are not resulting specifically from implementing the preferred project alternatives. Therefore, the O&M costs are not being treated as an avoided cost benefit.	K. Harpankar (GFT)	S. Chetka
13	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Number of Direct Beneficiaries	xxiv (.docx p. 25)	This sentence seems not representative of doing a flood prevention project. There are those that benefit from flood damage reduction benefits associated with having reduced damages such as structures and contents. If there are also flood damage reduction benefits to any agricultural land, then the acres of agricultural land with associated numbers of agricultural producers are also relevant. The benefit categories (Section 1.2.1) also provide insight as to the direct beneficiaries as well as potential indirect beneficiaries. Additionally, Appendix D informs that there are structures that are part of the calculation for damage reduction benefits which are associated with direct beneficiaries. Recommend indicating the direct beneficiaries. Reference: NWP 606.17	NRCS	NWMC	Y	The project directly benefits approximately 41 residential structures by removing them from the 100-year inundation boundary and protects at least 102 people assuming an average household size of 2.5.	K. Harpankar (GFT)	S. Chetka
14	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Project Life	xv (.docx p. 26)	See Comment above in reference to the Period of Analysis under the terms of the watershed agreement. Recommend ensuring the Period of Analysis should be for 52 years and reflecting the same throughout the watershed plan. References: 2014 390 NWP 506.50 WW	NRCS	NWMC	Y	Period of Analysis is listed as 52 years in the document, evaluated life of the project is listed as 50 years.	K. Harpankar (GFT)	S. Chetka
15	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Cultural and Historic Resources	xxviii (.docx p. 29)	Cultural resources and historic properties are related but are not interchangeable. Historic properties are specifically any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register for Historic Places. The goal of Section 106 is to determine whether or not the Federal undertaking will have the potential to cause effects to historic properties. It is unclear if historic properties were identified in the APE or just cultural resources. Recommend clarifying if the cultural resources identified in the APE were determined to be historic properties and only referring to NRHP-eligible and listed resources as historic properties throughout the document. References: 36 CFR 800.3, 36CFR 800.4, 36 CFR 800.16(i)	NRCS	NWMC	Y	Added the definition of historic properties and that the purpose of the Section 106 review was to consider the undertaking's potential to adversely affect historic properties.	J. Hesse (SWCA)	S. Chetka
16	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Cultural and Historic Resources	xxviii (.docx p. 29)	Letters dated 8/5/2024 and 1/3/2025 are not in Appendix A. Recommend that NRCS AZ include ALL Section 106 consultation correspondence (i.e., outgoing and incoming) demonstrating consultation with ALL relevant consulting parties regarding Section 106 initiation, the APE determination, identification efforts and results, and all determinations and findings per 36 CFR 800.2 through 36 CFR 800.5 and 390 NWP 501.56.A.1.b.(7). Reference: 36 CFR 800.2 through 36 CFR 800.5, 390 NWP 501.56.A.1.b.(7)	NRCS	NWMC	Y	All Section 106 correspondence including letters dated August 5, 2024 and January 3, 2025 have been added to Appendix E.	S. Chetka	S. Chetka
17	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working-Plan and Agreement_9.2025.docx	OMB Cultural and Historic Resources	xxviii (.docx p. 29)	Unclear if consultation with federally recognized Tribes was consistently conducted throughout the Section 106 process in accordance with 36 CFR 800.3(f)(2). Appendix E does not include all cited Section 106 correspondence to and from Tribes. NWMCM recommends clarifying statements on consultation with Tribes to: 1) reflect the consultation record documented through correspondence in Appendix E; 2) demonstrate adequacy of consultation documentation per 36 CFR 800.11; and 3) ensure descriptions in the Summary (Office of Management and Budget Fact Sheet) accurately summarize what's in the plan (390 NWP 501.36.A) and its appendices. Reference: 36 CFR 800.3(f)(2); 36 CFR 800.11, 390 NWP 501.36.A	NRCS	NWMC	Y	Consultation with federally recognized Tribes was conducted throughout the Section 106 process. Consultation letters sent, received and responses are attached in Appendix E.	B. Myers	S. Chetka

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18	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	OMB Cultural and Historic Resources	xxviii (.docx p. 29)	Letters sent to Tribes dated between May 16 and May 20, 2025, and presumably conveying the cultural resources report and effects findings are not in Appendix A. Recommend that NRCS AZ include ALL Section 106 consultation correspondence (i.e., outgoing and incoming) demonstrating consultation with ALL relevant consulting parties regarding Section 106 initiation, the APE determination, identification efforts and results, and all determinations and findings per 36 CFR 800.2 through 36 CFR 800.5 and 390 NWP 501.56.A.1.b.(7). Reference: 36 CFR 800.2 through 36 CFR 800.5, 390 NWP 501.56.A.1.b.(7)	NRCS	NWMC	Y	All Section 106 Consultation Letters to Tribes and SHPO including letters dated December 9, 2025 were provided in Appendix E detail the Brawley Wash's PL-566 Watershed Flood Prevention Operations Project (WFPO). Letter dated May 16, 2025 was sent to SHPO notifying the agency of - Section 106 Consultation - Class III survey report results can be referenced in Appendix E.	S. Cihelka	J. Alwin
19	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	OMB Cultural and Historic Resources	xxviii (.docx p. 29)	The finding of effect for the undertaking is unclear. Two different findings are cited here—NRCS's finding of No Historic Properties Affected and SHPO's concurrence with No Adverse Effect. It is the legal responsibility of the agency to make a finding of effect (36 CFR 800.2(a)) for the undertaking, and the SHPO's responsibility to agree with or object to the same finding in accordance with relevant stipulations under 36 CFR 800.4(d) through 36 CFR 800.5. Recommend clarifying NRCS's finding of effect and SHPO's agreement with/object to the same finding of effect in accordance with the above-cited regulations. References: 36 CFR 800.2, 36 CFR 800.4(d) through 36 CFR 800.5	NRCS	NWMC	Y	Added clarifying language. When Register-eligible properties are in the APE but not adversely affected, the SHPO's determination of effect is No Adverse Effect. 36 CFR 800.4(d) allows the agency to make a "No Historic Properties Affected" determination if Register-eligible properties are present, but the undertaking will have no effect on them.	J. Hesse (SWCA)	S. Cihelka
20	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	1. Introduction	1 (.docx p. 32)	The watershed Planning Background is missing required information, such as Authority, Sponsor, Cooperating Agencies, etc. The OMB fact sheet is not a substitute for the required information to be in the watershed plan document which would be available to the public upon removal of the OMB Fact Sheet. Recommend including the required information in the applicable sections of the plan. Reference: NWP 501.39	NRCS	NWMC	Y	The Authority, Sponsor, Cooperating Agencies, and other additional Watershed Planning background is provided in the Brawley Wash Watershed Plan and Environmental Assessment for the Pima County Regional Flood Control District, Arizona Abstract provided on (p. i) of the Plan-EA.	S. Cihelka	B. Myers
21	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	1. Introduction	1 (.docx p. 32)	Is the plan being pursued under PL 83-566 Flood Prevention or Watershed Protection authorized purpose? If it is flood prevention authorized purpose, then the wording "flood prevention" measures provides consistency although this plan seems intuitively providing watershed protection. Recommend being consistent for clarity with terminology in the narrative and update throughout document and appendices as appropriate. Reference: NWP 500.3.B.1.a; 500.3.B.1.b; NWP 600.3.B(i); 600.3.B(ii).	NRCS	NWMC	Y	The purpose of this Plan-EA is only related to Flood Prevention (floodplain restoration) and not Watershed Protection or Watershed Restoration. The document has been revised to make this distinction clear.	J. Alwin	S. Cihelka
22	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	1. Introduction	1 (.docx p. 32)	40 CFR 1500-1508 and 7 CFR 650 have been rescinded. Recommend the following for incorporation into Final Plan/NEPA documents and the associated FONSI/ROD: This environmental document was initiated using the 40 CFR 1500-1508 (specify which version of the regs in parenthesis following the citation) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (year) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	NRCS	NWMC	Y	This Plan-EA was initiated using 40 CFR Parts 1500-1508 and 7 CFR 650. In accordance with USDA's Interim Final Rule (90 FR 29644, July 3, 2025), NRCS exercised discretion to continue using the prior regulations for proposals underway. This environmental document was initiated using the 40 CFR 1500-1508 (2014) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	B. Myers	J. Alwin
23	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	1.1 Project Area	1 (.docx p. 32)	Appendix B indicates it is Figure 2, not Figure 3 identifying the problem areas. Recommend rectifying and resolving inconsistency and update throughout document as applicable. Also, see other comments regarding a programmatic approach to watershed planning. Reference: OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	Report reference will be updated to Figure 2.	J. Alwin	S. Cihelka
24	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	1.2.1 Parcels, Structures, and Vehicles	2 (.docx p. 33)	See comment on OMB Fact Sheet regarding "Direct Beneficiaries".	NRCS	NWMC	Y	Refer to Comment No. 199.	S. Cihelka	J. Alwin
25	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	1.2.1 Parcels, Structures, and Vehicles	2 (.docx p. 33)	Have not located inundation maps for the .1 Annual Exceedance Probability (10 yr) in Appendix C for the without-project nor for the with-project condition. Nor are there with-project inundation maps for the .01 AEP. Recommend providing the inundation maps in accordance with NWP guidance. Reference: NWP 501.60.A.3.b.	NRCS	NWMC	Y	Inundation maps for 10- and 100-year events are provided in Appendix B of Subappendix D.2.	J. Kang (CMG)	S. Cihelka
26	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	2. Purpose and Need for Action	5 (.docx p. 37)	The watershed plan does not adequately provide information about objectives and constraints for watershed planning. Objectives and Constraints. Planning objectives and constraints are statements of the reasons for the watershed planning effort. The objectives and constraints should reflect the views of coordinating agencies, consulting parties, and the public, identified during scoping and initial consultations regarding the problems and opportunities of the planning area. Watershed project plans must be formulated to meet the project objectives and to avoid the constraints. Planning objectives are statements that describe the desired results of the planning process by solving the identified problems and taking advantage of the identified opportunities. Constraints are the restrictions that limit the ability of the planning process or the project to achieve the federal or project-specific objectives. Recommend including the planning objectives that are directly related to the identified problems and opportunities and are used to formulate and evaluate alternatives. And then recommend including the constraints are considered to be restrictions that limit the ability of the planning process or the project to achieve the federal or project-specific objectives. Reference: (DM 9500-013 § 4(e)(1)(a)(1)) 2024 390 NWP 501.40 B.4	NRCS	NWMC	Y	The purpose of this Plan-EA is only related to Flood Prevention (floodplain restoration) and not Watershed Protection or Watershed Restoration. The Purpose and Need Statement (Section 2.2), and Watershed Resource Opportunities (Section 2.3) details Project's planning objectives meets the federal and local objectives of flood prevention. Project constraints are clearly identified as cultural resources, avoidance measures, and mitigation costs. These categories are consistent with both the National Watershed Program Manual (NWP) and NRCS policy guidance, which require that cultural, economic, and environmental considerations be explicitly evaluated during project planning (Sections 3.4 and 4.6). In reference to 2024 NWP, This environmental document was initiated using the 40 CFR 1500-1508 (2014) 390 NWP; (2014) 390 NWP; (2014) 9500-013 P&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025).	B. Myers	S. Cihelka

No.	Document	Section	Page	Comment	Agency	Reviewer	Addressed (Y/N)	Comment Response	Response By	Back
								In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.		
27	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	2. Purpose and Need for Action	5 (.docx p. 37)	Both problems and opportunities should be discussed. This subsection should provides a clear statement of the problem(s) to be solved and the opportunities to be gained. Water and related land resource problems and opportunities must be framed in terms of the Federal Objective and state and local stakeholder consideration of all potential concerns. Recommend providing a detailed description of negative issues affecting the human environment that are addressed by the project and plan. And then recommend identifying and describing all the foreseeable ways in which a proposed watershed project will: (a) Positively resolve immediate problems (stressors). (b) Promote positive, long-term stability and, as appropriate, change in large-scale issues (drivers) affecting the project area. Reference: DR 9500-013 § 6(b)(1), 2014 390 NWPM 501.40 B.1	NRCS	NWMC	Y	In reference to 2024 NWPM, This environmental document was initiated using the 40 CFR 1500-1508 (2014) 390 NWPM; (2014) 390 NWPH; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	B. Myers	S. Chelka
28	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	2.3 Watershed and Resource Opportunities and Sponsor Objectives	6 (.docx p. 38)	The objectives and opportunities should be clearly delineated. The objectives are important in understanding if they are being achieved through the implementation of a project and providing solutions to a clearly identified problem(s). A clear and concise problem statement should also be provided which should be aligned with the NEPA requirement of the purpose and need statement. Although there is good information within this section, modifying assists with clearly understanding the problem and what is to be achieved (objectives) to provide solutions to the identified problem providing focus of the study and determination of alternatives providing solutions and resolving identified problem(s). Recommend clearly identifying a problem statement, objectives, opportunities and any constraints. Reference: (2024) NWPM 501.40.3 & 4; NREH Part 611 Chapter 1	NRCS	NWMC	Y	In reference to 2024 NWPM, This environmental document was initiated using the 40 CFR 1500-1508 (2014) 390 NWPM; (2014) 390 NWPH; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	B. Myers	S. Chelka
29	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	2.4.1 Previous Relevant Studies	7 (.docx p. 39)	It is not clear as to what information was used given NRCS has its requirements, such as providing inundation maps for the without-project and with-project conditions across applicable annual exceedance probabilities. This would require modeling the structures for the with-project scenarios using a form of H&H modeling software allowing for an objective evaluation of the action alternatives to the baseline condition. If H&H modeling was done, then inundation maps could be generated, which are required to be included in Appendix C, otherwise the justification determination of the watershed plan is circumspect. Recommend rectifying the concern and provide the information and inundation maps for the without-project and action alternatives across the various annual exceedance probabilities. Reference: NWPM 501.60.A.	NRCS	NWMC	Y	See Response to Comment #211. The existing conditions H&H models have been obtained from the FEMA study. They serve as the basis of the H&H analysis for this project.	J. Kang (CMG)	S.Chelka
30	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	3.1 Agency, Tribal, and Public Outreach	10 (.docx p. 42)	Sentence reads as if the SHPO has ancestrally affiliated lands within the APE. Recommend revising to indicate NRCS AZ sent letters to SHPO and Tribes that attach religious and cultural significance to historic properties that may be present on the Tribes' ancestral, aboriginal, or ceded lands within the APE per 36 CFR 800.2(c)(2)(ii)(D). Reference: 36 CFR 800.2(c)(2)(ii)(D)	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Chelka
31	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	3.3.1 Scoping Comments and Responses	11 (.docx p. 43)	Would this be a potential constraint of the project if the restrictive covenant cannot be impacted by any work of the project and would need to be avoided to not violate it? Recommend ensuring the covenant does not impact the project and developing constraints as applicable. Reference: (2024) NWPM 501.40.B.4	NRCS	NWMC	Y	Parcel 208-23-0260 is owned by Pima County Parks & Recreation lies outside the Brawley Wash Project boundary. The provided parcel properties owned by Pima County identified to be encumbered by restrictive covenant during the March 30, 2021 Public Meeting were investigated Parcels (208540210, 21519005C, 21519002D, 21519002I, 208490020, 208490030, 208490010, 30119005H, 30119005C, 30118001A, 30119002D, and 20854134A) do not intersect any Alternative/Preferred Alternative boundaries.	S. Chelka	E. Demaria (PCFCD)
32	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	3.3.1 Scoping Comments and Responses	11 (.docx p. 42)	This is a good point and the H&H needs to assess on whether or not the stage and discharge of the flooding is causing damages based on various annual exceedance probabilities modeled. However, there are also seemingly issues with understanding towards H&H modeling not being conducted in affected environment section and whether or not H&H modeling was conducted for action alternatives. It would seem difficult and somewhat implausible to estimate flood damage reduction benefits without the necessary H&H modeling that an economist would use to estimate any residual damages leading to estimates of damage reduction benefits relative to structures, for example. Also, given the comment and response in section 3.3.1, it seems there are observations that actual damages are not occurring from past flood events. Recommend rectifying and clearly indicating in the analysis on the justification of any damages of the flooding. Reference: See other comments in Appendix D regarding the structure damage calculations.	NRCS	NWMC	Y	H&H models and resulting flow depths, with & without projects, have been provided in CMG's Alternative Analysis Report. The flow depths (10- & 100-Year) vary greatly at different locations within the study area. Potential flooding hazards/benefits have been identified at the selected alternatives. Exhibits can be referenced in Appendix B of Subappendix D.2.	J. Kang (CMG)	S. Chelka
33	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	3.4 Identification of Resource Concerns (Table 21 - Geology)	12 (.docx p. 44)	As checked, geology indicates it is relevant but the discussion/justification indicates the opposite. Recommend providing clarity and rectifying potential inconsistency. Reference: (2024) NWPM 501.39.A.5.c; 501.41	NRCS	NWMC	Y	Changed relevance to "No" to match justification.	T.Knoblock (SWCA)	S. Chelka

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34	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	3.4 Identification of Resource Concerns (Table 21 - Land Use)	12 (.docx p. 44)	The watershed plan clearly states that one of objectives of this project is to restore agricultural land. Therefore, rejecting land use as irrelevant precludes many reasonable alternatives and thus violates NEPA, P&G, PR&G, and NRCS resource planning requirements.Recommend thoroughly incorporating land use throughout this plan. Note that if there are valid, project-specific constraints on related to land use, those should be identified in the appropriate section of the plan. References: NEPA; PR&G; 2014 390 NWPM 501.37.A; 2014 390 NWPH 601.37.B(7)	NRCS	NWMC	Y	Non-productive associated agricultural land is owned by the Sponsor that is being restored for flood mitigation and not for future agricultural land use.	J. Nelson	S. Chelka
35	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	3.4 Identification of Resource Concerns (Table 21 - Cultural and Historic Resources)	14 (.docx p. 45)	There are discrepancies between the effects finding listed here, in the Environmental Effects table in the Office of Management and Budget (OMB) Fact Sheet, and in the May 16, 2025, letter to SHPO in Appendix E The May 16, 2025, letter to SHPO in Appendix E indicates NRCS AZ made a "no historic properties affected" finding but SHPO concurred with a "no adverse effect" finding based on avoidance of sites within the APE. The Environmental Effects table also reports both a "no historic properties affected" finding and a "no adverse effect" finding. The NWMCM recommends clearly stating NRCS AZ's finding of effect as appropriate per 36 CFR 800.4(d)-800.5 wherever noted in the Plan-EA, ensuring information disseminated in the Plan-EA and its appendices is consistent and accurate per 36 CFR 800.6 and Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines. Reference: 36 CFR 800.4 through 36 CFR 800.5, Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines (https://www.usda.gov/about-usda/general-information/staff-offices/office-chief-information-officer/guidelines-and-compliance-resources/information-quality-activities)	NRCS	NWMC	Y	Language in the Plan-EA was updated to clarify Environment effect of cultural and historic resources determination in compliance with 36 CFR 800.4(d) through 36 CFR 800.5. Referencing letter dated May 16, 2025 sent to SHPO notifying the agency of - Section 106 Consultation - Class III survey report results can be referenced in Appendix E.	J. Alwin	S.Chelka
36	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	3.4 Identification of Resource Concerns (Table 21 - Cultural and Historic Resources)	14 (.docx p. 45)	Statement does not identify how Cultural and Historic Resources are related to the project nor does it provide rationale for consideration of Cultural and Historic Resources concerns based on their governing authority (e.g., Section 106) per 390 NWPM 501.41.A.1.a (2024). Recommend revising to comply with 390 NWPM 501.41.A.1.a (2024), demonstrating how Historic and Cultural Resources are related to the project and relevant based on the governing authority (e.g., Section 106). Reference: 390 NWPM 501.41.A.1.a (2024)	NRCS	NWMC	Y	Acknowledged and revised accordingly. Table 21 is now Table 1.	J. Hesse (SWCA)	S.Chelka
37	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	3.4 Identification of Resource Concerns (Table 21 - Cultural and Historic Resources)	14 (.docx p. 45)	Per 390 NWPM 501.41, resource concerns that are relevant to the project (e.g., resource exists in project area, project would have effect on the resource) are carried forward throughout the planning process. Cultural and Historic Resources are relevant as determined by results of the records search described in Section 4.6.1 (i.e., cultural resources are present in and near the project).Recommend revising to reflect Cultural and Historic Resources are relevant per 390 NWPM 501.41 and given results of the records search.Reference: 390 NWPM 501.41	NRCS	NWMC	Y	Acknowledged and revised accordingly. Table 21 is now Table 1.	J. Hesse (SWCA)	S.Chelka
38	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	3.4 Identification of Resource Concerns (Table 21 - Recreation)	14 (.docx p. 45)	As checked, recreation indicates it is relevant but the discussion/justification indicates the opposite.Recommend providing clarity and rectifying potential inconsistency.Reference: (2024) NWPM 501.39.A.5.c; 501.41	NRCS	NWMC	Y	Changed relevance to "No" to match justification. Table 21 is now Table 1.	T.Knoblock (SWCA)	S. Chelka
39	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	3.4 Identification of Resource Concerns (Table 21 - Land Use)	14 (.docx p. 45)	The scoping table is conflicting being that the resource concern for Land Use is considered as being relevant, but rationale suggest that resource is not relevant. The watershed plan request funds for mitigation. Therefore, rejecting land use as irrelevant precludes many reasonable alternatives and thus violates NEPA, P&G, PR&G, and NRCS resource planning requirements.Recommend ensuring that the requirements for mitigation will not impact land use. If it is determined mitigation will impact land use then recommend thoroughly incorporating land use throughout this plan. Note that if there are valid, project-specific constraints on related to land use, those should be identified in the appropriate section of the plan. References: NEPA; PR&G; 2014 390 NWPM 501.37.A; 2014 390 NWPH 601.37.B(7)	NRCS	NWMC	Y	Changed relevance to "No" to match justification. Table 21 is now Table 1.	T.Knoblock (SWCA)	S. Chelka
40	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	4.2.1.1 Hydrologic Modeling	17 (.docx p. 49)	How can H&H not be conducted when this watershed plan is about implementing measures to provide flood damage reduction benefits? This potentially raises questions as to the applicability of the PL 83-566 authorized purpose as well as analysis conducted to determine the appropriateness and reasonableness of the baseline damages estimated particularly when scoping comments and responses were made in section 3.3.2 in regard to no observable velocity of flow and no observable damages from historical events. The methodology of watershed planning is based on the without-project to with-project framework. Consequently, this requires conducting the baseline H&H and the action alternatives H&H to determine the changes for each action alternative relative to the baseline, although the FEMA study may provide the information for the baseline, it would seem problematic if the H&H modeling was not conducted in order to determine the performance of alternatives relative to the baseline condition. Additionally, inundation maps are required for the without-project and with-project alternatives for the various annual exceedance probabilities and related to the damage reduction benefits. See other comments regarding damage estimates in Appendix D economics section. Recommend clarifying and rectifying the H&H modeling for estimation of damages as applicable while also taking note of the comments and responses section 3.3.1. Reference: (2024) NWPM 510.60A.3.b; NREH Part 611 Chapter 1;	NRCS	NWMC	Y	H&H models were not created for the Brawley Wash Plan-EA Project, the FEMA FLO-2D models were utilized from the Brawley and Black Wash Risk Analysis and Mapping Study (2023) and modified to incorporate proposed berm openings, water harvesting basins, diversion channels, and berm features for alternative floodplain mitigation simulations. The use of the existing H&H model was discussed in more detail in Section 2 of Appendix D.2, and the flood mitigation methods applied to the model was discussed in Section 3 of Appendix D.2. In reference to 2024 NWPM, This environmental document was initiated using the 40 CFR 1500-1508 ((2014) 390 NWPM; (2014) 390 NWPH; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	J. Alwin	S. Chelka
41	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	4.6.1.1 Cultural Context	29 (.docx p. 61)	The statute that Section 106 comes from is the National Historic Preservation Act (NHPA), not the Regulations for the Protection of Historic Properties (RFCP). Recommend replacing Regulations for the Protection of Historic Properties (RFCP) with National Historic Preservation Act (NHPA) and all instances of RFCP with NHPA. Reference: 36 CFR 800	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Chelka

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42	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.1 Cultural Context	29 (.docx p. 61)	There are inconsistencies between lists of Tribes here, in Section 7.3, and in the correspondence in Appendix E. Appendix E contains correspondence for the listed Tribes here but also letters NRCS AZ sent to the Fort McDowell Yavapai Nation and San Carlos Apache Tribe. The list of Tribes in Section 7.3 matches the correspondence in Appendix E. Neither the list of Tribes in Section 7.3 nor the correspondence in Appendix E include the Tonto Apache Tribe listed here. The NWMC recommends that NRCS AZ demonstrate a reasonable and good faith effort to identify Tribes that attach religious and cultural significance to historic properties potentially affected by an undertaking per 36 CFR 800.2(c)(2). Consult with those ALL those identified Tribes—including the Tonto Apache Tribe, if applicable—in accordance with 36 CFR 800.2 through 36 CFR 800.5; include documentation of the consultation efforts and results in Appendix E of the watershed project plan per 390 NWP 501.56.A.1.b.(7); and ensure information disseminated in the Plan-EA and its appendices is consistent and accurate per Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines. Reference: 36 CFR 800.2 through 36 CFR 800.5, 390 NWP 501.56.A.1.b.(7); Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines (https://www.usda.gov/about-usda/general-information/staff-offices/office-chief-information-officer/guidelines-and-compliance-resources/information-quality-activities)	NRCS	NWMC	Y	List of consulting parties in Sections (4.6.1.1) and (7.3) have been revised to reflect based on the NRCS consultation letter to the SHPO which includes the City of Tucson, Pima County, the Arizona State Museum, and Pima County Conservation Lands & Resources as well as Ak-Chin Indian Community, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, Tohono O'odham Nation, Tonto Apache Tribe, White Mountain Apache Tribe, and Yavapai Apache Nation.	J. Hesse (SWCA)	S. Chelka
43	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.1 Cultural Context	29 (.docx p. 61)	Unclear if APE as defined here (i.e., "potential construction areas for flood prevention measures") includes geographic areas for indirect effects (i.e., "those [effects to historic properties] caused by the undertaking that are later in time or farther removed in distance but are still reasonably foreseeable" (190 NCRPH 601.25.C.2.ii)). NWMC recommends: Determining the APE per the definition in 36 CFR 800.16(d), including a description of how NRCS AZ defined the geographic area or areas where the undertaking may cause direct and indirect effects on historic properties; and Per 36 CFR 800.11, providing sufficient documentation (e.g., maps, photographs, drawings, figures) in the Plan-EA to enable any reviewing parties to understand the basis of the APE determination. Reference: 36 CFR 800.16(d), 36 CFR 800.11	NRCS	NWMC	Y	We believe we included only alternatives that provide combined beneficial effects, compared beneficial effects vs adverse, and performed incremental analysis where appropriate. The incremental analysis is captured on the scalable components but does not isolate every feature of the preferred alternative. Results of the incremental analysis is also included in the appendices and not explicitly described in Section 5 Alternatives.	B. Myers	S. Chelka
44	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.1 Cultural Context	29 (.docx p. 61)	The definition of historic properties in the Section 106 regulations is found at 36 CFR 800.16(l). Per 36 CFR 800.4(c), the determination of eligibility process is codified in 36 CFR 63. Eligibility determinations are made by applying the National Register criteria found at 36 CFR 60.4 to districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association. Recommend revising to accurately reflect the definition of historic property and the process for determining eligibility as stipulated and referenced under the Section 106 regulations. Reference: 36 CFR 800.16(l), 36 CFR 800.4(c), 36 CFR 63, 36 CFR 60.4	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Chelka
45	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.4 Cultural Surveys	30 (.docx p. 62)	Unclear how or if the Problem Areas are related to the APE as defined in the 1st paragraph of Section 4.6.1.1, and if the APE determination was consulted with other relevant parties (in addition to the sponsor) per 36 CFR 800.4. The NWMC recommends: Determining the APE per the definition in 36 CFR 800.16(d), including a description of how NRCS AZ defined ALL the geographic area or areas where the undertaking may cause direct and indirect effects on historic properties; Providing sufficient documentation (e.g., maps, photographs, drawings, figures) in the Plan-EA to enable any reviewing parties to understand the basis of the APE determination per 36 CFR 800.11; Summarizing the consultation with SHPO and other relevant consulting parties regarding the APE determination per 36 CFR 800.4(a) and 800.4(b); and Ensuring the APE descriptions are consistent across the plan and appendices. Reference: 36 CFR 800.4, 36 CFR 800.16(d), 36 CFR 800.11	NRCS	NWMC	Y	In accordance with 36 CFR 800.4(c), NRCS applied the National Register Criteria (36 CFR part 63) to evaluate the historic significance of the properties identified within the APE and consulted with the SHPO on the determinations of NHP eligibility.	J. Hesse (SWCA)	S. Chelka
46	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.4 Cultural Surveys	30 (.docx p. 62)	The 2024 survey results report cited here is absent from Appendix E. The NWMC recommends including adequate documentation of ALL historic property identification efforts to: 1) demonstrate a reasonable and good faith effort to carry out appropriate identification efforts per 36 CFR 800.4(b); and 2) ensure that determinations and findings are supported by sufficient documentation to enable any reviewing parties to understand their basis per 36 CFR 800.11. All information included should conform to the confidentiality requirements of Section 304 of the NHPA (54 USC 307103) and 36 CFR 800.11(c). Reference: 36 CFR 800.4(b), 36 CFR 800.11; 36 CFR 800.11(c); Section 304 of the NHPA (54 USC 307103)	NRCS	NWMC	Y	The Class I and Class III survey reports made available in Appendix E have been redacted so as not to disclose the locations of archaeological sites. Disclosure of the locations of historic properties to the public may be in violation of both federal and state laws. Applicable federal and state laws include, but may not be limited to, Section 304 of the National Historic Preservation Act (54 United States Code [USC] 307103) and Arizona Revised Statutes Title 39, Section 125.	J. Hesse (SWCA)	S. Chelka
47	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.4 Cultural Surveys	31 (.docx p. 63)	It is unclear how or if NRCS AZ determined the project would not adversely effect the two historic properties within the APE (i.e., a "no adverse effect" finding) and if the finding of effects was consulted with ALL relevant consulting parties. The May 16, 2025, letter to SHPO in Appendix E indicates NRCS AZ made a "no historic properties affected" finding but SHPO concurred with a "no adverse effect" finding based on avoidance of sites within the APE. If the undertaking avoids historic properties, it will not have an effect on historic properties (i.e., "no historic properties affected" finding). Appendix E does not contain letters conveying NRCS AZ's finding of effect to other relevant parties. The NWMC recommends: Clearly stating NRCS AZ's finding of effect per 36 CFR 800.4(d) through 36 CFR 800.5, describing how the undertaking will not cause effects on historic properties (i.e., "no historic properties affected") or will cause effects on historic properties ("no adverse effect" or "adverse effect"); Clarifying if all relevant consulting parties (see 36 CFR 800.2 and 36 CFR 800.5) have been consulted and either concurred with the finding or did not object to the finding; and including ALL Section 106 consultation correspondence (i.e., outgoing and incoming) demonstrating consultation with ALL relevant consulting parties regarding Section 106 initiation, the APE determination, identification efforts and results, and all determinations and findings per 36 CFR 800.2 through 36 CFR 800.5 and 390 NWP 501.56.A.1.b.(7). References: 36 CFR 800.2 through 36 CFR 800.5, 390 NWP 501.56.A.1.b.(7)	NRCS	NWMC	Y	Revised to include language explaining NRCS's No Historic Properties Affected determination and the SHPO's No Adverse Effects concurrence, referencing the appropriate regulations for each. The Arizona SHPO does not recognize "No Historic Properties Affected" findings if historic properties are in the APE. Both the NRCS and the SHPO agree that there will be no adverse effects that need to be resolved.	J. Hesse (SWCA)	S. Chelka

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48	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.4 Cultural Surveys	31 (.docx p. 63)	Change will append to is appended; the consultation documentation will need to be updated, if not already updated.,	NRCS	NWMC	Y	The Class I and Class III survey reports made available in Appendix E have been redacted so as not to disclose the locations of archaeological sites. Disclosure of the locations of historic properties to the public may be in violation of both federal and state laws. Applicable federal and state laws include, but may not be limited to, Section 304 of the National Historic Preservation Act (54 United States Code [USC] 307103) and Arizona Revised Statutes Title 39, Section 125.	J. Hesse (SWCA)	S. Chelka
49	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	4.6.1.4 Cultural Surveys	31 (.docx p. 63)	The Section 106 process, including consultation with relevant parties, must be completed prior to approval of the project per 36 CFR 800.1(c). For example, when the final Plan-EA and associated decision document (FONS) are recorded, there will be no future versions of the EA to which Section 106 correspondence can be appended. Recommend updating to reflect completion of NRCS AZ's consultation efforts with relevant parties in compliance with timing described in 36 CFR 800.1(c). Reference: 36 CFR 800.1(c)	NRCS	NWMC	Y	Deleted reference to future versions of EA. Final SHPO correspondence will be included in Appendix E.	J. Hesse (SWCA)	S. Chelka
50	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	4.8 Ecosystem Services	34 (.docx p. 66)	The discussion about Ecosystem Services only provides general information and does not discuss any relevant ecosystem services identified within the watershed. The ecosystem service does not provide a discussion about the relevant services and benefits provided to humans from the watershed. The Affected Environment should provide a discussion about the relevant ecosystem services and the connection between the desired ecological conditions and how these conditions affect humans. Recommend providing a detailed discussion about the relevant ecosystem services that were identified during the Scoping phase. Reference: (DM 9500-013 8.b.(1)).	NRCS	NWMC	Y	Acknowledged. Discussion will be edited to provide relevant information about specific ecosystem services within the watershed and specifically discuss services relevant to each alternative.	T. Knoblock (SWCA)	S. Chelka
51	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	5.1 Alternatives Development and Formulation Process	37 (.docx p. 69)	There should be consistency between the Purpose and Need Section of defined objectives and the screening/evaluation criteria. As stated here, these are relatively worded better as study objectives (clear and concise) using two of the five aspects of writing objectives outlined in the NWPM: desired 1) effect and 2) subject. See comments in Purpose and Need Section regarding the study objectives. Recommend rewording study objectives in Purpose and Need Section to align with these screening/evaluation criteria. Reference: (2024) NWPM 501.40.B.4; AE Firm Training (Planning).	NRCS	NWMC	Y	In reference to 2024 NWPM, This environmental document was initiated using the 40 CFR 1500-1508 (2014) 390 NWPM; (2014) 390 NWPH; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	B. Myers	S.Chelka
52	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	5.1 Alternatives Development and Formulation Process	37 (.docx p. 69)	A complete alternative represents a combination of works of improvement that meet the project purpose and need, Federal Objective, Guiding Principles, and Project Objectives with appropriate consideration of cost. And watershed plans must consider a range of alternatives to address the problems and opportunities associated with defined resource concerns. Recommend ensuring that consideration for the Federal Objective in combination with the Project Objectives were both given full consideration when alternatives were formulated. And also recommend ensuring that the alternatives address the problems and opportunities associated with the defined resource concerns. Reference: DM 9500-013 4e(1)(a)1; DM 9500-013 4a; DM 9500-013 6b1	NRCS	NWMC	Y	Preferred Alternative for each Problem Area includes various "measures" to restore pre-improvement (i.e., before agricultural fields) conditions in agreement/consultation with NRCS-AZ, Sponsor, cooperating agency(ies)...et.al. Alternatives were built from combinations of measures that together meet the federal objective while also meeting local project objectives (flood prevention).	J. Alwin	B. Myers
53	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	5.2 Alternatives Eliminated from Detailed Society	37 (.docx p. 69)	For each alternative that is eliminated from detailed study, the watershed project plan must discuss the reasons for its elimination with sufficient detail to support the elimination decision Recommend including information in plan from this section. Reference: 2024 NWPM 501.42B.3.c	NRCS	NWMC	Y	Cost-benefit analysis, total project costs, cultural survey results, potential harm to existing critical facilities, conflicts in hydraulic modeling were the primary reasons for the Sponsor in agreement with NRCS-AZ in eliminating certain alternatives. In reference to 2024 NWPM, This environmental document was initiated using the 40 CFR 1500-1508 (2014) 390 NWPM; (2014) 390 NWPH; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	J. Alwin	B. Myers

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54	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	5.2 Alternatives Eliminated from Detailed Society	37 (.docx p. 69)	The numbering and location of the respective tables and information seems incongruent. For example, upon reviewing Appendix E (submitted pdf), there does not seem to be a table 22. However, towards the end of this word document submitted, there is other information which seems to be another Appendix E with table 22. As submitted it is cumbersome and difficult to find the information. As such, it is not clear on the logic of the presentation and numbering of the plan component appendices. Additionally, upon reviewing Appendix E (pdf), it also includes referenced information as Appendix A. Also, sequential numbering of the tables and figures should be done in accordance to where they are located within the document. As presented with some references, it would be expected that the sequential numbering would be found in the main document. Recommend presenting the information using logical sequencing, numbering of sections, and follow guidance on where information should be located. Update document and appendices as appropriate. Reference: See other comments regarding numbering: OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	To conform with NWPB file and page guidelines, Tables and Figures from reference Reports (ie. Economic Analysis, H&H Report, etc...) were not included in the Plan-EA to minimize redundancies. Table 22 will not be added to Plan-EA to adhere to file size constraints.	S. Cihelka	B. Myers
55	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	5.3 Alternatives Description	38 (.docx p. 69)	The formulation process for analyzing alternatives does not comply with the policy found in the NWPB and the DM9500 for alternatives. This will lead to incorrect conclusions for selecting the preferred alternative. The formulation process is the basis for selecting combinations of measures to include as alternatives. In the formulation of alternative plans, include only increments that provide combined beneficial effects outweighing combined adverse effects. Where applicable, alternatives should be formulated to examine the incremental efficiency (varying the scale) of an activity and separating it into various components. Alternatives with multiple components should be considered together and as separate alternatives if the components are independent, meaning there are no obvious dependencies or a scientific need to implement all of the measures as a system. Recommend combining the proposed measures that have been incorrectly identified as alternatives, in order to correctly form the alternatives that support the proposed action(s) or reducing damages from flooding and consider both problems and opportunities and objectives and constraints. Also recommend conducting an incremental analysis of the combination of measures of each alternative to determine which alternative's combined beneficial effects outweigh the combined adverse effects while maximizing public benefits when compared to cost of implementation. References: DM9500 6 (4) (a) DM9500 6 (5) (a) DM9500 6 (4) (c)	NRCS	NWMC	Y	The area of Brawley Wash Watershed is extensive, spanning over 198,000-acres, the numbering of alternatives was developed to separate the study area into subsets during the Sponsor/Stakeholder Feasibility meeting held August 24, 2022. Adjusting the Alternative numbering would raise more issues in historical administrative records and documents due to the extended length of the project. We believe we included only alternatives that provide combined beneficial effects, compared beneficial effects vs adverse, and performed incremental analysis where appropriate. The incremental analysis is captured on the scalable components but does not isolate every feature of the preferred alternative. Results of the incremental analysis is also included in the appendices and not explicitly described in the Alternatives chapter. Alternatives contained one or more measures that were examined and selected for each alternative in cooperation with the Sponsor, NRCS-AZ, and Stakeholders through multiple workshops. Alternatives were created to reduce the number of modeling scenarios and maximize the potential benefits in alignment with the federal and local objectives.	S. Cihelka	B. Myers
56	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	5.3 Alternatives Description	38 (.docx p. 69)	In the description of alternatives that follows after this summary, it is advantageous to clearly identify the numbering of the alternatives with the associated measures minimizing the need to revisit this summary page to understand the narrative's applicability to a particular alternative. Recommend determining the method to pursue of watershed plan development, programmatic or project, with appropriate analysis ensuring cost effective methods pursued (least cost measures for programmatic type or cost effective alternative from each site having its own set of alternatives, and use appropriate and applicable identifiers for the information. See other comments regarding programmatic approach and developing measures and alternatives. Reference: NWPB 501.42; NPPH; AE Firm Planning Training; Planning Manual, 1996 by Charles Yao (good info). OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	The area of Brawley Wash Watershed is extensive spanning over 198,000-acres, the numbering of alternatives was developed to separate the study area into subsets during the Sponsor/Stakeholder Feasibility meeting held August 24, 2022. Adjusting the Alternative numbering would raise more issues in historical administrative records and documents due to the extended length of the project. Cost-benefit analysis, total project costs, cultural survey results, eliminating alternative that pose potential harm to existing critical facilities, conflicts in hydraulic modeling were the primary reasons for the Sponsor in agreement with NRCS-AZ in eliminating certain alternatives.	S. Cihelka	B. Myers
57	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	5.3 Alternatives Description	38 (.docx p. 69)	It is not clearly understood why there is a section 5.2- Alternatives Eliminated from Detailed Study, and this section 5.3- Alternatives Descriptions, with #3 and #4 being removed from further consideration in 5.3. Recommend following the planning process from potential measures, screening of measures, combining measures into alternatives, initial array of alternatives, screening of initial array of alternatives, final array of alternatives, etc., and providing clarity and rectifying any potential inconsistencies while logically sequencing the planning process. Reference: NWPB 501.42; NPPH; AE Firm Planning Training; Planning Manual, 1996 by Charles Yao (good info).	NRCS	NWMC	Y	The provided Plan-EA template included this and the related report structure and therefore this section remained and was populated in consultation with the NRCS-AZ office. Problem Areas #3 and #4, were found to occur within a "critical facility" and therefore any alternatives related to this facility was requested by the cooperative agency, to be removed from further consideration and the reasoning why is stated within this Plan-EA in Sections 5.1 and 5.3.	J. Alwin	B. Myers
58	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	5.3.1 Alternative - Delineate Flow Corridor(s) (10-year)	39 (.docx p. 71)	The labeling convention of alternatives, and the seemingly measures, seems problematic. What is labeled as an alternative followed by a description, seems actually to be "measures". For example, as depicted for problem area #1, the following are included: 5.3.1-Alternative-Delineate Flow Corridors; 5.3.2-Alternative-Invasive Species Management, etc.; and 5.3.3- Alternative-Restore Disturbed Area. However, these three components are seemingly measures. These individually named "alternatives" are then combined into an Alternative 1 for Problem Area 1 (Buckelew West) and named Alternative No. 1- Restore Disturbed Area. What is being called alternatives, which seem more likely measures, are using the same numbering system and causes some confusion. Recommend revisiting the naming and numbering convention of measures and alternatives. Reference: Professional Judgement/Planning Practices; NPPH; NWPB 501.42	NRCS	NWMC	Y	The area of Brawley Wash Watershed is extensive spanning over 198,000-acres, the numbering of alternatives was developed to separate the study area into subsets during the Sponsor/Stakeholder Feasibility meeting held August 24, 2022. Adjusting the Alternative numbering would raise more issues in historical administrative records and documents due to the extended length of the project. Alternatives were built from combinations of measures that together meet the federal objective while also meeting local project objectives (flood prevention).	S. Cihelka	B. Myers
59	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	5.3.2 Alternative - Invasive Species Management, Wildlife Management, and Vegetation Management	39 (.docx p. 71)	Alternative solutions are formulated based on the issues relevant to defining the problems and opportunities. A complete alternative represents a combination of works of improvement that meet the project purpose and need, Federal Objective, Guiding Principles, and Project Objectives with appropriate consideration of cost. It is unclear how invasive species, wildlife, and vegetative management, meet this criteria. Furthermore, it is unclear how this alternative meets the requirements for acceptability, effectiveness and efficiency. Recommend ensuring that alternatives are formulated based on the issues relevant to defining the problems and opportunities while considering both the Federal Objectives and Projective Objectives. Also recommend ensuring that the this alternative meets the requirements for acceptability, effectiveness and efficiency. References: DM 9500-013 6b(4)(a)	NRCS	NWMC	Y	Alternatives were developed in accordance with the Federal Objectives, Purpose and Need Statement and in alignment with We believe we included only alternatives that provide combined beneficial effects, compared beneficial effects vs adverse, and performed incremental analysis where appropriate. The incremental analysis is captured on the scalable components but does not isolate every feature of the preferred alternative. Results of the incremental analysis is also included in the appendices and not explicitly described in Section 5 Alternatives.	B. Myers	S. Cihelka

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60	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	5.4 Summary and Comparison of Alternatives	40 (.docx p. 72)	This section of the plan is not laid out as per (2024) NWP (Figure 501D-2) and has sequencing issues. The summary and comparison of alternatives does not occur until the evaluation of alternatives has been conducted (Environmental Consequences: Evaluation of Alternatives section) and prior to Preferred Alternative section. Recommend following the content and format guidance as per the National Watershed Program Manual. Reference: NWP Figure 501D-2; 501.30 - 501.59	NRCS	NWMC	Y	In reference to 2024 NWP, This environmental document was initiated using the 40 CFR 1500-1508 (2014) 390 NWP; (2014) 390 NWP; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	B. Myers	S. Cihelka
61	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	5.4 Summary and Comparison of Alternatives	40 (.docx p. 72)	This Summary and Comparison section should provide a summarized narrative description in tabular format of the alternatives brought forward for detailed analysis. The alternatives must be summarized in comparative form in substantially equal detail and include major items used in the decision-making process. Recommend adhering to the other comment about, and in reference to, the Summary and Comparison of Alternatives, and then ensuring that this criteria has been met to properly evaluate each alternative.	NRCS	NWMC	Y	To conform with NWP file and page guidelines, Tables and Figures from reference Reports (ie. Economic Analysis, H&H Report, etc...) were not included in the Plan-EA to minimize redundancies. Table 23 will not be added to Plan-EA to adhere to file size constraints.	S. Cihelka	B. Myers
62	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	6 Environmental Consequences	41 (.docx p 73)	The titles of the sections are not as per guidance in the NWP. Watershed planning does not only consist of NEPA adherence but also includes planning steps associated with the 9-steps of planning. Recommend revisiting the section titles and update as applicable. Reference: (2024) NWP 501.30 - 501.58	NRCS	NWMC	Y	In reference to 2024 NWP, This environmental document was initiated using the 40 CFR 1500-1508 (2014) 390 NWP; (2014) 390 NWP; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	S. Cihelka	B. Myers
63	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	6 Environmental Consequences	41 (.docx p 73)	This section has not included the applicable tables as outlined in NWP related to the summary and comparison tables. These tables are required to be included in the appropriate section of the main document as part of "telling the planning story" and are not incorporated by reference. Having to search the numerous material throughout the documents becomes arduous particularly for a lay-person. Recommend including the summary and comparison tables in the appropriate section as indicated in the NWP. Reference: NWP 501.43 9 (Figure 501D-5, 501D-6); DM 9500-013, Appendix A.	NRCS	NWMC	Y	To conform with NWP file and page guidelines, Tables and Figures from reference Reports (ie. Economic Analysis, H&H Report, etc...) were not included in the Plan-EA to minimize redundancies and file size limits. Table 23 will not be added to Plan-EA to adhere to file size constraints.	S. Cihelka	B. Myers
64	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	6 Environmental Consequences (Impacts to Soil of Preferred Alternatives)	41 (.docx p 73)	It is premature to have a discussion about the Preferred Alternative in the Environmental Consequences section of the watershed plan. It gives the appears of a predetermined outcome for watershed planning. The Environmental Consequences section of the watershed plan is to provide the analytical basis for comparing the effects of each alternative that is carried forth into the final array of alternatives for detailed study. This section must thoroughly describe the economic, environmental, and social effects of each alternative with enough detail to support an understanding of each alternative's comparative effects. Recommend revisiting the Environmental Consequences section of the watershed plan and then ensuring that the section provides the analytical basis for comparing the effects of each alternative that is carried forth into the final array of alternatives for detailed study. References: 2014 390 NWP 501.38	NRCS	NWMC	Y	Problem Areas were expanded and listed in the report for additional clarification.	S. Cihelka	B. Myers
65	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	6.2 Water Resources (No Action Alternative)	42 (.docx p. 73)	See comment in Section 4.2.1 and Appendix regarding H&H modeling and estimation of damages.	NRCS	NWMC	Y	Refer to response to Comment #226.	S. Cihelka	B. Myers
66	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	6.2.5 Floodplain Management (Preferred Alternative)	44 (.docx p. 76)	Recommend adding all preferred alternatives locations to avoid confusion.	NRCS	NWMC	Y	Acknowledged and revised accordingly.	S. Cihelka	B. Myers
67	AZ_Brawley_Wash_Draft Plan-EA- NWMCM Working- Plan and Agreement_9.2025.docx	6.2.5 Floodplain Management (Preferred Alternative)	44 (.docx p. 76)	The analysis should be done from the perspective of without-project to with-project conditions. The H&H modeling of the alternatives and corresponding measures would determine the flood damage reductions associated with respective action alternatives which would either confirm or refute flood damage reductions with little ambiguity as narrated here with "could mitigate", which seems speculative. H&H modeling and inundation maps would hopefully and clearly depict the with-project alternatives benefitted areas (structures no longer inundated) as additional evidentiary visual representation of the benefitted areas for an objective economic analysis. Recommend ensuring the without-project and with-project analysis is modeled ensuring an objective, transparent, and clear indication of the results and provide the required inundation maps in Appendix C clearly labelled (without- project by AEP; with-project by AEP). Reference: NWP 501.60 A.3.b; NREH Part 611.0401, Chapter 1; Chapter 2; ; DM 9500-013 Section 7; OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies.	NRCS	NWMC	Y	Text revised from "could mitigate" to "would potentially mitigate". Inundation Maps can be references in Appendix B in Subappendix D.2 (Problem Area 2 (Exhibit 3B), Problem Area 6 (Exhibit 7B), and Problem Area 7 (Exhibit 8B)).	S. Cihelka	B. Myers

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68	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	6.4.1 Cultural and Historic Resources	49 (.docx p. 81)	The environmental consequences evaluation described here for Historic and Cultural Resources does not adequately identify and describe the direct, indirect, and cumulative effects each alternative would have on historic properties should each alternative be implemented. Per 390 NWP 501.43.A.3, the evaluation of each alternative's effects (including the No Action alternative) on relevant resources must identify direct, indirect, and cumulative effects under Section 106 (390 NWP 501.43.A.3.c). Effects assessments under Section 106 follow the process stipulated in 36 CFR 800.4(d) through 36 CFR 800.5 and result in a finding of effects made by the agency—e.g., no effect (no historic properties affected), no adverse effect, adverse effect—in consultation with relevant parties. Recommend providing an effects assessment with finding of effect on historic properties for each of the alternatives in accordance with 390 NWP 501.43.A.3 and 36 CFR 800.4(d)-800.5. Reference: 390 NWP 501.43.A.3, 36 CFR 800.4(d)-800.5.	NRCS	NWMC	Y	Revised section to discuss the potential effects of each alternative on historic properties and the PCRFD's commitment to avoid historic properties, resulting in separate effects assessments for each alternative.	J. Hesse (SWCA)	S. Chetka
69	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	6.4.1 Cultural and Historic Resources (No Action Alternative)	49 (.docx p. 81)	The purpose of Section 106 of the NHPA (54 USC 306108) is to account for the effects of federal undertakings on historic properties, not impacts, per 36 CFR 800.1(a). Recommend discussing the effects, defined at 36 CFR 800.16(i), of the proposed alternatives on historic properties through out the plan, where appropriate. References: Section 106 of the NHPA (54 USC 306108); 36 CFR 800.1(a); 36 CFR 800.16(i)	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Chetka
70	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	6.4.1 Cultural and Historic Resources (Mitigation Measures)	50 (.docx p. 82)	The environmental consequences evaluation described here for Historic and Cultural Resources does not adequately identify and describe the direct, indirect, and cumulative effects each alternative would have on historic properties should each alternative be implemented. Per 390 NWP 501.43.A.3, the evaluation of each alternative's effects (including the No Action alternative) on relevant resources must identify direct, indirect, and cumulative effects under Section 106 (390 NWP 501.43.A.3.c). Effects assessments under Section 106 follow the process stipulated in 36 CFR 800.4(d) through 36 CFR 800.5 and result in a finding of effects made by the agency—e.g., no effect (no historic properties affected), no adverse effect, adverse effect—in consultation with relevant parties. Recommend providing an effects assessment with finding of effect on historic properties for each of the alternatives in accordance with 390 NWP 501.43.A.3 and 36 CFR 800.4(d)-800.5. Reference: 390 NWP 501.43.A.3, 36 CFR 800.4(d)-800.5.	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Chetka
71	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	6.4.1 Cultural and Historic Resources (Mitigation Measures)	50 (.docx p. 82)	Placing and removing fill, as well as use of the temporary access road, on top of an archaeological site would cause effects (36 CFR 800.5(a)(21)). Recommend omitting the cited examples to avoid, minimize or mitigate adverse effects (36 CFR 800.6). If NRCS AZ pre-consulted with SHPO, Tribes, and other consulting parties on measure to avoid, minimize, or mitigate adverse effects to historic properties, a summary of that consultation and supporting documentation should be included within the plan and the situations where those measure would be employed clearly identified. Reference: 36 CFR 800.5(a)(2), 36 CFR 800.11, 36 CFR 800.6	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Chetka
72	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	6.4.1 Cultural and Historic Resources (Mitigation Measures)	50 (.docx p. 82)	Unclear if the cited Inadvertent Discovery Plan for post-review discoveries of cultural resources and human remains will be compliant with the post-review discovery process under 36 CFR 800.13 and relevant laws pertaining to human remains discoveries (e.g., State of Arizona laws). The NWMC recommends that the Inadvertent Discovery Plan be compliant with 36 CFR 800.13 and relevant laws pertaining to human remains discoveries. Reference: 36 CFR 800.13	NRCS	NWMC	Y	Added statement that post-review discovery protocol would be compliant with 36 CFR 800.13 and ARS 41-844 and 41-865, Arizona's burial discovery laws.	J. Hesse (SWCA)	S. Chetka
73	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	6.6 Ecosystem Services	52 (.docx p. 84)	The analysis of environmental consequences - does not embody the ecosystem service framework required by PR&G. An ecosystem services framework is a methodology of framing and describing the comprehensive set of benefits that people receive from nature "Ecosystem Services Framework". This framework identifies, describes, and quantifies impacts to environmental, social, and economic resources that result both directly and indirectly from a federal investment. Alternatives must be evaluated in terms of their tradeoffs and the alternative which maximizes benefits with consideration of cost selected as the preferred alternative. These considerations are mandated by PR&G and must be evident throughout the document The environmental consequences section of this Plan-EA does not present full consideration of Ecosystem Services by not fully adopting the ecosystem service framework. Per PR&G requirements, scoping will identify significant ecosystem services and stakeholders affected by the proposed Federal investment both on- and off-site. Recommend (1) incorporating a discussion about Ecosystem Services and the benefits to man and the environment within the environmental consequences section of this Plan-EA. Recommend (2) implementing an ecosystem services approach throughout the entirety of the planning effort. Recommend (3) identifying the appropriate metrics in order to accurately evaluate the ecosystem services affected by a Federal investment. Reference: DM 9500-013 – 8	NRCS	NWMC	Y	Acknowledged and revised accordingly.	T. Knoblock (SWCA)	S. Chetka
74	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working-Plan and Agreement_9.2025.docx	6.6.1 Provisioning Services	52 (.docx p. 84)	The discussion about Ecosystem Services does not discuss any relevant ecosystem services identified within the watershed that provide benefits to humans as a result of a proposed federal investment. It is not clearly understood how this narrative is related to the provisioning service category and benefits to human beings. This section should provide a discussion about the benefits that can be expected from ecosystem services and the connection between the desired ecological conditions as a result of a federal investment. Recommend extending the narrative to indicate the benefit to humans Reference: DM 9500-013 Section 8	NRCS	NWMC	Y	Acknowledged and revised accordingly.	T. Knoblock (SWCA)	S. Chetka

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75	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	6.7 Cumulative Effects	53 (.docx p. 85)	Cumulative effects as related to NEPA has been removed from the current NEPA statute and regulation. And is additionally addressed in CEQ guidance. The determination of Cumulative Effects is still required under PR&G. Per the policy under PR&G the cumulative effects for each alternative studied must be determined for each alternative studied as a part of the evaluation process for the project. Recommend striking the 40 CFR citation and replacing with DM 9500 4.b.(2)(m) Reference: DM 9500 4.b.(2)(m). MEMORANDUM FOR HEADS OF FEDERAL DEPARTMENTS AND AGENCIES (Implementation of the National Environmental Policy Act). https://ceq.doe.gov/docs/ceq-regulations-and-guidance/CEQ-Memo-Implementation-of-NEPA-02.19.2025.pdf	NRCS	NWMC	Y	Acknowledged. CEQ references removed and section revised to focus on cumulative effects analysis required under PR&G.	T. Knoblock (SWCA)	S. Cihetka
76	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	6.7.2.4.2 Cultural Resources	55 (.docx p. 87)	It is unclear what avoidance and minimization measures the sponsor will implement to avoid and/or minimize effects to historic properties in accordance with 36 CFR 800.5(b). Previous sections of the plan indicated NRCS AZ made a finding of no historic properties affected, per 36 CFR 800.4(d)(1), as historic properties would not be affected by the project. Per 36 CFR 800.11, for any reviewer to understand the basis of NRCS AZ's Section 106 finding of effect, NRCS AZ must ensure the finding is supported by sufficient documentation in the Plan-EA and its appendices. Recommend clearly describing what avoidance and minimization measures the sponsor will specifically implement to avoid and/or minimize effects to historic properties. Reference: 36 CFR 800.4(d)(1); 36 CFR 800.5(b); 36 CFR 800.11	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Cihetka
77	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	6.7.2.5 Ecosystem Services	56 (.docx p. 88)	See Comments above in reference to determining the benefits to humans received from Ecosystem Services.	NRCS	NWMC	Y	Acknowledged and revised accordingly.	T. Knoblock (SWCA)	S. Cihetka
78	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	6.8.3 Climate Change	56 (.docx p. 88)	An EO signed January 20, 2025, titled "INITIAL RESCISSIONS OF HARMFUL EXECUTIVE ORDERS AND ACTIONS" presents the rescission of EO 14008 (Tackling the Climate Crisis at Home and Abroad). https://www.whitehouse.gov/presidential-actions/2025/01/initial-rescissions-of-harmful-executive-orders-and-actions/ Recommend adhering to EO 14148 Initial Rescissions of Harmful Executive Orders and Actions (https://www.federalregister.gov/documents/2025/01/29/2025-01956/unleashing-american-energy) as related to your planning and environmental documents. Strike and remove climate change language throughout document. Additionally, verify your decision document (FONSI) will not be reliant on findings founded in climate change as defined in the rescinded EO's. https://www.whitehouse.gov/presidential-actions/2025/01/initial-rescissions-of-harmful-executive-orders-and-actions/7CFR1b	NRCS	NWMC	Y	Acknowledged and revised accordingly.	S. Cihetka	B. Myers
79	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	7.3 List of Persons and Agencies Consulted	59 (.docx p 91)	There are inconsistencies between lists of Tribes here, in Section 4.6.1.1, and in the correspondence in Appendix E. The list of Tribes in Section 4.6.1.1 does not contain the Fort McDowell Yavapai Nation and San Carlos Apache Tribe. The list of Tribes here matches the correspondence in Appendix E. Neither the list of Tribes here nor the correspondence in Appendix E include the Tonto Apache Tribe listed in Section 4.6.1.1. The NWMC recommends that NRCS AZ: Demonstrate a reasonable and good faith effort to identify Tribes that attach religious and cultural significance to historic properties potentially affected by an undertaking per 36 CFR 800.2(c)(2) ; Consult with identified Tribes—including the Tonto Apache Tribe, if applicable—in accordance with 36 CFR 800.2 through 36 CFR 800.5; Include documentation of the consultation efforts and results in Appendix E of the watershed project plan per 390 NWPM 501.56.A.1.b.(7); and Ensure information disseminated in the Plan-EA and its appendices is consistent and accurate per Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines. Reference: 36 CFR 800.2 through 36 CFR 800.5, 390 NWPM 501.56.A.1.b.(7); Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines (https://www.usda.gov/about-usda/general-information/staff-offices/office-chief-information-officer/guidelines-and-compliance-resources/information-quality-activities).	NRCS	NWMC	Y	Refer to response to Comment #228.	S. Cihetka	B. Myers
80	AZ_Brawley_Wash_Draft Plan-EA- NWMC Working- Plan and Agreement_9.2025.docx	8 Preferred Alternative	60 (.docx p. 92)	The preferred alternative section has not been completed correctly and is missing required economic and structure tables indicating it is insufficient. The economic and structure tables are required to be in this section, not incorporated by reference. The required information is located at the end of a lengthy appendix D, however, the economic tables 27 through table 31 (Tables 1 through 6, as applicable to plan) are required to be located in the preferred alternative section of the main document. Although much analysis and information has been conducted, it is arduous searching through and scrolling through the information to locate the information, given the voluminous information provided and how organized. Also, the Appendix D Investigations and Analysis Report for economics should be completed in a fashion that facilitates understanding by "telling the economic story" while minimizing searching for content. This is applicable to other disciplines as well. Recommend completing the watershed plan with applicable content and format as outlined in the (2024) NWPM, inclusive of appropriate economic and structural tables in the preferred alternative section. Reference: NWPM 501.44 (Table 1 through 6 as applicable to the plan) NWPM 501.30; OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	In reference to 2024 NWPM, This environmental document was initiated using the 40 CFR 1500-1508 ((2014) 390 NWPM; (2014) 390 NWPH; (2014) 9500-013 PR&G) and 7 CFR 650 regulations. These regulations have recently been rescinded and replaced with USDA regulations found under 7 CFR 1b. However, in a good-faith effort to fulfill NEPA's requirements, including Congressional timeline and considerations of fiscal restraints, the agency decided to continue to use 40 CFR 1500-1508 (2014) and 7 CFR 650. This is permissible per the USDA policy guidance issued in the Interim Final Rule's preamble. The Federal Register notice said: "To ensure an orderly transition without undue impact on the USDA mission, USDA subcomponents have discretion to continue using the versions of USDA and agency-specific NEPA regulations in place before publication of this interim final rule, as well as the 2020 version of the CEQ NEPA regulations, where it makes sense for proposals that are at a certain stage in the applicable NEPA process (categorical exclusion, environmental assessment, or environmental impact statement)." 90 FR 29644 (July 3, 2025). In the NRCS's expert opinion, it has thoroughly considered the factors mandated by the statute and the regulatory frameworks it used; and that, in the responsible federal official's judgment, the analysis contained herein is adequate to inform and reasonably explain findings regarding the proposed action and selected alternative.	B. Myers	S.Cihetka

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81	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	8.1 Selection and Rationale for the Preferred Alternative	60 (.docx p. 92)	The screening process for analyzing and selecting the preferred alternative was incorrectly applied during the evaluation of alternatives process. And this has impacted the ability of the watershed plan to accurately support this conclusion for maximizing public benefits while meeting both the Federal Objectives and the Project Objectives. Recommend employing the correct screening criteria to properly evaluate each alternative, in order to correctly support the conclusion for selecting the alternative that reducing damages associated with flooding. Recommend then determining what public benefits would be generated based off the evaluations of each alternative carried forward for a detailed analysis as an alternative for the proposed actions. Afterwards recommend conducting the proper evaluation to determine if the proposed federal actions due in fact support this statement for selecting preferred alternative. References: DM9500 6 (4) (a); DM9500 6 (5) (a)	NRCS	NWMC	Y	Alternatives were evaluated and compared in accordance with NRCS watershed planning process and PR&G criteria. A summary and comparison of alternatives, including PR&G criteria, is present in Appendix E. To improve clarity, Section 8.1 was revised to reference the evaluation and comparison of alternatives in support of the preferred alternative selection.	S. Cihelka	B. Myers
82	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	8.2 Measures to be Installed	60 (.docx p. 92)	Was not able to locate these exhibits in Appendix D. There is a reference to another Appendix B but those exhibits are not there as well. The organization of this plan seems incongruent and poses challenges when seeking the required cited information. Additionally, inundation maps for the AEPs investigated for the without-project and with-project alternatives are required to be included in Appendix C. The content and format of a watershed plan were developed to ensure applicable information is in a known section of the plan. The uncertainty to the location of the numerous exhibits, as mentioned in the H&H analysis, for both the without-project and with-project inundation makes it difficult to ascertain the benefitted areas and resulting flood damage reduction benefits. Recommend providing the content as described in NWPM for the Appendix D telling the required discipline story through tabulation and narrative summary and the more detailed and raw data in Appendix E. As provided, there is extensive information in Appendix D that should moved into other applicable appendices. Reference: See other comments regarding numbering and naming conventions of material.	NRCS	NWMC	Y	Exhibits have been added to Appendix B of Subappendix D.2 for project alternatives.	S. Cihelka	B. Myers
83	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	8.3 Minimization, Avoidance, and Compensatory Mitigation Measures	61 (.docx p. 93)	Costs for mitigation measures are included and are allocate to PL83-566 funding requests for cost share assistance. But it is unclear what the funds are being request for being that the watershed plan does not clearly state what costs are associated with the measure for mitigation. The section for the Preferred Alternative describes the measures to be installed including the mitigation features, permits and compliance requirements, costs, installation sequence and responsibilities, and financing of the project. Operation, maintenance, and replacement responsibilities are described. Recommend providing additional details about mitigation and implementation of the watershed project. Reference: 2014 390 NWPM 501.40 B	NRCS	NWMC	Y	A footnote on mitigation costs has been added to the Table 29 in Appendix E. Mitigation costs include expenditures to cover cultural resource mitigation for archaeological sites found in the Tucker Road and Tortuga Ranch problem areas. Also included are costs for biological mitigation including preconstruction surveys and as needed relocation of burrowing owls. The mitigation cost used includes cultural resource and wildlife mitigation cost and thus PL 83-566 funding can be used for cost share for mitigation.	K. Harpankar (GFT)	S. Cihelka
84	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	8.3 Minimization, Avoidance, and Compensatory Mitigation Measures	61 (.docx p. 93)	Unclear if this refers to post-review discoveries (36 CFR 800.13) or Section 106 review prior to project approval (36 CFR 800.1(c)). Recommend clarifying if this refers to post-review discoveries or Section 106 review prior to project approval. Reference: 36 CFR 800.13, 36 CFR 800.1(c)	NRCS	NWMC	Y	Revised to include the planned avoidance of known historic properties; also added a measure describing the procedures for inadvertent discoveries.	J. Hesse (SWCA)	S. Cihelka
85	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	8.4.3.1.2 National Historic Preservation Act	62 (.docx p. 94)	The Section 106 process, including consultation with relevant parties, must be completed prior to approval of the project per 36 CFR 800.1(c). Recommend updating to reflect completion of NRCS AZ's consultation efforts with relevant parties listed in 36 CFR 800.2(c)-(d) throughout the Section 106 process, demonstrating compliance with timing described in 36 CFR 800.1(c). Reference: 36 CFR 800.1(c), 36 CFR 800.2(c)-(d)	NRCS	NWMC	Y	Acknowledged and revised accordingly.	J. Hesse (SWCA)	S. Cihelka
86	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	11.2 Tribes	70 (.docx p. 102)	There are inconsistencies between lists of Tribes here, in Sections 4.6.1.1 and 7.3, and in the correspondence in Appendix E. The list of Tribes in Section 4.6.1.1 does not contain the Fort McDowell Yavapai Nation list here but lists the Tonto Apache Nation not listed here or in Appendix E correspondence. Section 7.3 and Appendix E also list the San Carlos Apache Tribe, which is not listed here. Neither the list of Tribes here, in Section 7.3, nor the correspondence in Appendix E include the Tonto Apache Tribe listed in Section 4.6.1.1. Recommend that NRCS AZ: Demonstrate a reasonable and good faith effort to identify Tribes that attach religious and cultural significance to historic properties potentially affected by an undertaking per 36 CFR 800.2(c)(2). Consult with identified Tribes—including the Tonto Apache Tribe, if applicable—in accordance with 36 CFR 800.2 through 36 CFR 800.5; Include documentation of the consultation efforts and results in Appendix E of the watershed project plan per 390 NWPM 501.56.A.1.b.(7); and Ensure information disseminated in the Plan-EA and its appendices is consistent and accurate per Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines. Reference: 36 CFR 800.2 through 36 CFR 800.5, 390 NWPM 501.56.A.1.b.(7); Section 515 of the Information Quality Act (PL 106-554) as implemented in USDA's Quality of Information guidelines (https://www.usda.gov/about-usda/general-information/staff-offices/office-chief-information-officer/guidelines-and-compliance-resources/information-quality-activities)	NRCS	NWMC	Y	The list has been updated to reflect the Tribal Parties that were contacted for Section 106 consultations letters and the NRCS-AZ office.	S. Cihelka	B. Myers
87	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	Appendix D.2.1 Hydrology and Hydraulic Alternatives Analysis Report (Section 2)	(.docx p. 164)	These materials do not seem to be located in Appendix B. As such, the numbering system of the various figures and graphs is incongruent and arduous in locating information through a document with voluminous information provided. Recommend following the guidance and place relevant information in the required appendices and other supporting information in Appendix E. This would minimize issues with reading and comprehension of the material, particular when others not familiar material will need to understand and make determinations of adequacy of the plan. Reference: See other comments about placement of figures, tables and numbering.	NRCS	NWMC	Y	See Response to Comment #211.	J. Kang (CMG)	S. Cihelka
88	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working-Plan and Agreement_9.2025.docx	Appendix D.2.1 Hydrology and Hydraulic Alternatives Analysis Report (Section 4.1)	(.docx p. 166)	These Exhibits do not seem to be located in Appendix B. Inundation maps for the without-project and with-project conditions, by AEPs should be located in Appendix C and clearly labeled for all alternatives studied. At a minimum the 100 year & 500 floodplain maps are required, along with the other events considered and modeled for the action alternatives studied. See other comments. Reference: NWPM 501.60 A.3.b	NRCS	NWMC	Y	See Response to Comment #211. The scope of the project was to only to consider the 10-year and 100-year events and meet the revised Purpose and Needs Statement. The 500-year storm events was not evaluated and out of scope for this project. Inundation exhibits has been included in Appendix B of Subappendix D.2.	J. Kang (CMG)	S. Cihelka

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89	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	Appendix D.2.1 Hydrology and Hydraulic Alternatives Analysis Report (Appendix A)	(.docx p. 181)	At this point of this document, the appendices begin (in the main document as submitted). However, the sequencing of the appendices is not understood. For instance, the sequencing is: Appendix A, Appendix B, Appendix C, Appendix D, Appendix E, then goes to D.3, D.4, D.4.1, Appendix A, Appendix B, Appendix C, Appendix D, Appendix E, D.3, D.4, D.4.1, D.4.2, D.4.3, D.4.4, D.4.5, D.5,D.6, Appendix E. - It is unclear what is occurring with the sequencing and reviewing the plan is confusing and poses challenges. Overall, the content, formatting, and sequencing of the information needs a thorough editing, amending and reorganizing for others, including lay persons, to gain an understanding of the project while minimizing potential confusion and incongruency. Also, numerous identification systems are used such as: Exhibits, References, Figures, and Maps. Employing one consistent method aids in following the planning process while also assisting with expectations of where the information is located (it remains uncertain where some of the "exhibits" mentioned are located within the overall plan). Recommend reviewing the submitted watershed plan materials and reorganize content and formatting of the information in accordance with the guidance in the NWPM as well as ensuring a clear and relatively easier road map of following the included information. Reference: NWPM 501.30 through 501.60.	NRCS	NWMC	Y	Sequencing of the Plan-EA has been adjusted to clarify locations of documents. Headers in the Appendices/Subappendices have been added to provide clarification between the Plan-EA, supporting documents, and appendices within the Plan-EA appendix/reference documents.	J. Kang (CMG)	S. Cihelka
90	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	Appendix E (Table 23)	(.docx p. 286)	See Comments in the Alternatives section of the watershed plan in reference to the Summary and Comparison of Alternative Plans. Recommend including the Summary and Comparison of Alternative Plans the body of the watershed plan under the Alternatives section	NRCS	NWMC	Y	To conform with NWPM file and page guidelines, Tables and Figures from reference Reports (ie. Economic Analysis, H&H Report, etc...) were not included in the Plan-EA to minimize redundancies. Table 23 will not be added to Plan-EA to adhere to file size constraints.	S. Cihelka	B. Myers
91	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	Watershed Agreement (Table - Preferred Alternative - Prickle Desert (PA6) - Alternative 3)	iii (.docx p. 4)	See Comment above in the watershed agreement in reference to cost-share for mitigation.	NRCS	NWMC	Y	A footnote on mitigation costs has been added to the table. Mitigation costs include expenditures to cover cultural resource mitigation for archaeological sites found in the Tucker Road and Tortuga Ranch problem areas. Also included are costs for biological mitigation including preconstruction surveys and as needed relocation of burrowing owls. The mitigation cost used includes cultural resource and wildlife mitigation cost and thus PL 83-566 funding can be used for cost share for mitigation.	K. Harpankar (GFT)	S. Cihelka
92	AZ_Brawley_Wash_Draft Plan-EA-NWMC Working- Plan and Agreement_9.2025.docx	Appendix E (Table 32 - Agency Consultation Record)	(.docx p. 298)	The NWMC recommends updating this table to reflect NRCS AZ's reasonable and good faith consultation efforts (and results) with ALL relevant parties throughout the Section 106 process (36 CFR 800.) as documented in descriptions and summaries in the Plan-EA and in copies of correspondence included in Appendix E per 390 NWPM 501.56.A.1.b.(7). Reference: 36 CFR 800. 390 NWPM 501.56.A.1.b.(7)	NRCS	NWMC	Y	All correspondence for Section 106 consultation Letters to Tribes and SHPO have been updated and are provided in Appendix E.	S. Cihelka	B. Myers
93	AZ - Brawley Wash -NWMC Working - Appendix_D_JA Report_9.2025.docx	Appendix D.1 Economic Analysis	D.2 (.docx p. 2)	The economic tables 27- through table 31 (Tables 1 thru 6, as applicable to particular study), are required to be located in the preferred alternative section of the main document as well. Although much analysis and information has been conducted, it becomes arduous searching through and scrolling through the document to locate the information. Recommend including the applicable economic tables and information in the preferred alternative section of the plan, as required. Reference: NWPM 401.44; NWPM 501.45 through 501.55 (Table 1 through 6 as applicable to the plan); NWPM 501.60.A.	NRCS	NWMC	Y	Acknowledged, Tables have been added in Section 8 for support.	K. Harpankar (GFT)	S. Cihelka
94	AZ - Brawley Wash -NWMC Working - Appendix_D_JA Report_9.2025.docx	Appendix D.1 Economic Analysis Exhibit D1 (Commercial Business)	D.3 (.docx p. 3)	Different commercial activities have potential different content to structure ratios. The USACE Sacramento District conducted a study some years ago. The NWMC flood damage tool has content to structure value ratios for numerous structure types, which were sourced from studies. Also, the NRCS sources cited do not provide all this information indicated. Recommend providing justification for the type of commercial buildings that the content to ratio is used for with understanding each commercial business is not affected similarly. Reference: Professional Judgement and Practice	NRCS	NWMC	Y	It is acknowledged that different commercial activities can have different structure value to content value ratios. The assumption of content value as 200% of the structure value was developed based on past project experience working with NRCS, where this simplifying assumption received approval.	K. Harpankar (GFT)	S. Cihelka
95	AZ - Brawley Wash -NWMC Working - Appendix_D_JA Report_9.2025.docx	Appendix D.1 Economic Analysis II.A. Structures and Vehicles	D.5 (.docx p. 5)	Depreciation of structure should be accounted for when estimating the value of the structure; replacement value less depreciation (Depreciated replacement value). Recommend rectifying and ensuring that the depreciated replacement value is used.Reference: Economic Principles; Professional Practice; USACE ER 1105-2-100 (for more information).	NRCS	NWMC	Y	The consideration of the noted item (use of depreciated replacement value) was not included within this study scope as agreed to by the Sponsor and NRCS-AZ. The consideration of the noted item (use of depreciated replacement value) was not included within this study scope as agreed to by the Sponsor and NRCS-AZ.	K. Harpankar (GFT)	S. Cihelka
96	AZ - Brawley Wash -NWMC Working - Appendix_D_JA Report_9.2025.docx	Appendix D.1 Economic Analysis III.A. Structures and Vehicles	D.7 (.docx p. 7)	This Figure 2 is also labelled as Figure 4 in Appendix C.Recommend cogently reorganizing the watershed plan with the information, data, and tables and using a logical numbering and sequencing of the information from beginning of the document throughout and clearly indicating the location as well as the identifier (i.e., Figure 2, Appendix C).Reference: (2024) NWPM 501.60.A; 501.60.A.4	NRCS	NWMC	Y	Figure 2 reference was revised to clarify Figure 4 within the Appendix C.	S. Cihelka	B. Myers
97	AZ - Brawley Wash -NWMC Working - Appendix_D_JA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D7)	D.10 (.docx p. 10)	See other comment regarding the correct methodology of estimating flood damages calculations with annual exceedance probabilities in Exhibit D11.	NRCS	NWMC	Y	Will address noted tables accordingly.	K. Harpankar (GFT)	S. Cihelka
98	AZ - Brawley Wash -NWMC Working - Appendix_D_JA Report_9.2025.docx	Appendix D.1 Economic Analysis III.C. Roadways and Roadway Bridges	D.10 (.docx p. 10)	As presented with these assumptions, there does not seem to be any evidence presented that roads have historically been damaged and require some form of replacement or any required cleanup efforts. Required inundation maps of the H&H modeling have not been provided in Appendix C that provides clarity for the evaluation of without-project condition to the with-project alternatives formulated which would provide additional visual support of any road inundation and the assumptions taking into consideration depth, discharge and extent of flooding by annual exceedance probability.See other comments in section 3.3.2 of main document.Recommend providing historical evidence that these damages have occurred, inundation maps by annual exceedance probabilities, and reconciling potential inconsistencies.Reference: NWPM 501.60.A.3.b. NREH Part 611.0401; Professional Practice; OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	The consideration of historical evidence for damage to roadways was not included within this study scope as agreed to by the Sponsor and NRCS-AZ. Inundation limit map for the 10-year event (Figure 20 in Appendic C) has been provided in addition to that for the 100-year event (Figure 4 in Appendic C).	K. Harpankar (GFT)	S. Cihelka
99	AZ - Brawley Wash -NWMC Working - Appendix_D_JA Report_9.2025.docx	Appendix D.1 Economic Analysis III.C. Roadways and Roadway Bridges	D.10 (.docx p. 10)	Could not find any flood routing for storm events to determine proper damages to roads and bridges. A 10-year depth grid is given in Appendix E, but no 100-year grid. Recommend providing proper data inundation maps by annual exceedance probabilities.Reference: 2024 NWPM 501.60.A.3.b.	NRCS	NWMC	Y	Inundation limit map for the 10-year event (Figure 20 in Appendic C) has been provided in addition to that for the 100-year event (Figure 4 in Appendic C).	K. Harpankar (GFT)	S. Cihelka

No.	Document	Section	Page	Comment	Agency	Reviewer	Addressed (Y/N)	Comment Response	Response By	Bkck																														
100	AZ - Brawley Wash -NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D10)	D.12 (.docx p. 12)	See other comment regarding the correct method of determining flood damages below at Exhibit D11.	NRCS	NWMC	Y	Our estimation of expected annual damages is done with an appropriate method by taking the average damages of two frequency flood event damages and weighting them with the change in annual exceedance probability (over the damages interval).Please see the example EAD calculation below <table><tr><th>Flood Event</th><th>Exceedance Probability</th><th>Damage</th><th>Average Damage</th><th>Delta Prob</th><th>Contribution to EAD</th></tr><tr><td>0</td><td>0</td><td>\$526,654</td><td></td><td></td><td></td></tr><tr><td>100</td><td>0.01</td><td>\$526,654</td><td>\$526,654</td><td>0.01</td><td>5,267</td></tr><tr><td>10</td><td>0.1</td><td>\$320,795</td><td>\$423,725</td><td>0.09</td><td>38,135</td></tr><tr><td colspan="5">Total EAD</td><td>43,402</td></tr></table>	Flood Event	Exceedance Probability	Damage	Average Damage	Delta Prob	Contribution to EAD	0	0	\$526,654				100	0.01	\$526,654	\$526,654	0.01	5,267	10	0.1	\$320,795	\$423,725	0.09	38,135	Total EAD					43,402	K. Harpankar (GFT)	S. Cihelka
Flood Event	Exceedance Probability	Damage	Average Damage	Delta Prob	Contribution to EAD																																			
0	0	\$526,654																																						
100	0.01	\$526,654	\$526,654	0.01	5,267																																			
10	0.1	\$320,795	\$423,725	0.09	38,135																																			
Total EAD					43,402																																			
101	AZ - Brawley Wash -NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D11)	D.12 (.docx p. 12)	Appendix D Table 1 depicts structures by type, depth of flooding with damages. However, it is unclear what damage curves were used (except for a vague statement of "default or user defined depth damage curve") given the potential for inaccuracies or incorrect estimates from the information provided (although III.A narrates aspects). It is also unclear regarding first floor elevations or beginning damage point. As an example of the information provided for existing conditions (Table 1), there are negative depths with damages (structure ID 55 (-.37), ID 79 (-.36) & ID 269 (-.25) with damages of \$47K, \$37K and \$32K respectively, but no contents damages) for the 10 year event, and positive depths for example ID 55 with .04 depth and \$55K damages and contents damages for the 100 year event. It seems somewhat problematic to have structure damages with no water inundating the structure which would suggest these damages are associated with the foundation of the structure and it remains uncertain what this damage consists or extent of same (also considering that foundations are assumed to be .5ft to 2 ft in this analysis, which raises questions). The same issue is apparent with mobile home structures and the associated depths of flooding and estimated damages. It seems as if adjustments were not made for first floor elevation and the beginning damage point, while also considering adjustments for foundations constructed as slabs verse crawl spaces (with understanding that most flood occurrences are assumed to not damage slab foundations), then consequently, there is potential for overestimating damages in the baseline condition; more significant damage is when water exceeds the first floor elevation. It would be advantageous understanding how many structures have crawl spaces and how many have slabs. Please provide clarity of what is occurring while also considering the comments and responses in Section 3.3.2 of main document indicating there were no observable velocity of inundation nor observable damages from historical events. Average structure 'depreciated replacement values' for each respective type of structure are also not presented allowing to determine rough estimates for the damages presented. Also in this regard, depreciated replacement value, and not replacement value of structure, is used for estimating damages. See other comments in main document regarding H&H modeling in section 4.2 & 6.2 in estimating damages. Recommend revisiting the modeling and ensuring correctly done to rectify any perceived anomalies, provide depth damage curves for structure type, provide clarity on depreciated replacement values, and average depreciated value for each structure category. Reference: Professional Practice; OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies Economic Principles; USACE ER 1105-2-100 provides insight into depreciated replacement value.	NRCS	NWMC	Y	The consideration of the depreciated replacement values was not included within this study scope as agreed to by the Sponsor and NRCS-AZ. To allow for the beginning of the damage point at finished floor elevation, an adjustment for foundation height was applied to structures depth. Depth-damage curves employed in the analysis are included in an excel file labeled depth-damage curves, the link for which is as follows: Structure_USACEdepthDamagecurves.xls (Attachment 3 in Subappendix D1.1. With the example property types mentioned in the comment, please refer to the provided depth-damage curve. The positive damage mentioned in the comment, results from the curve interpolating.	K. Harpankar (GFT)	S. Cihelka																														
102	AZ - Brawley Wash -NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D11)	D.12 (.docx p. 12)	The correct methodology of estimating expected annual damages is to take the average damages of two frequency flood event damages and weight it with the change in annual exceedance probability, (over the damages interval), not directly weight a frequency flood event damages by one AEP. Recommend conducting annual average flood damages using correct calculation methodology.Reference: NREH Part 611.0201	NRCS	NWMC	Y	Our estimation of expected annual damages is done with an appropriate method by taking the average damages of two frequency flood event damages and weighing them with the change in annual exceedance probability (over the damages interval) Please refer to an example EAD calculation provided here: <table><tr><th>Flood Event</th><th>Exceedance Probability</th><th>Damage</th><th>Average Damage</th><th>Delta Prob</th><th>Contribution to EAD</th></tr><tr><td>0</td><td>0</td><td>\$19,896,405</td><td></td><td></td><td></td></tr><tr><td>100</td><td>0.01</td><td>\$19,896,405</td><td>\$19,896,405</td><td>0.01</td><td>\$198,964</td></tr><tr><td>10</td><td>0.1</td><td>\$6,118,196</td><td>\$13,007,301</td><td>0.09</td><td>\$1,170,657</td></tr><tr><td colspan="5">Total EAD</td><td>\$1,369,621</td></tr></table>	Flood Event	Exceedance Probability	Damage	Average Damage	Delta Prob	Contribution to EAD	0	0	\$19,896,405				100	0.01	\$19,896,405	\$19,896,405	0.01	\$198,964	10	0.1	\$6,118,196	\$13,007,301	0.09	\$1,170,657	Total EAD					\$1,369,621	K. Harpankar (GFT)	S. Cihelka
Flood Event	Exceedance Probability	Damage	Average Damage	Delta Prob	Contribution to EAD																																			
0	0	\$19,896,405																																						
100	0.01	\$19,896,405	\$19,896,405	0.01	\$198,964																																			
10	0.1	\$6,118,196	\$13,007,301	0.09	\$1,170,657																																			
Total EAD					\$1,369,621																																			
103	AZ - Brawley Wash -NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D11)	D.12 (.docx p. 12)	Including information pertaining to number of the structures being inundated for the without-project condition (by AEP experiencing damages) and residual structures in the with-project alternatives (by AEP experiencing damages) provides better clarity of the effects of implementing projects. This information combined with applicable and required inundation maps in Appendix C would provide better insight into the adequacy of the analysis. Recommend including the structure counts within the table as well the required inundation maps in Appendix C.Reference: 501.60.A.3.b & A.4.	NRCS	NWMC	Y	Structure counts are added as suggested (Exhibit D11 in Subappendix D1.1).	K. Harpankar (GFT)	S. Cihelka																														
104	AZ - Brawley Wash -NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D11)	D.12 (.docx p. 12)	These estimates for the .1 AEP are incorrect, and seem to be associated with approximately the .19 AEP (= 5.22 year recurrence interval) or other possible issues. For example, our estimate for the .1 AEP contribution for the baseline condition is approximately \$611,819 and not \$1,170,657. For the roughly = .19134 AEP the annual damages are about = \$1,170,655, which is closely associated with the estimate provided in the table. Recommend reviewing all estimates in the various tables and rectifying the apparent inconsistencies while also understanding the correct methodology of estimating annual average equivalent values for flood damages as noted in a comment above. Update throughout appendices and documents as appropriate.Reference: NREH Part 611.0201; NWPM 501.60.A.4	NRCS	NWMC	Y	Please see example EAD calculations provided in earlier comment responses for details of this calculation (Comment Response # 288).	K. Harpankar (GFT)	S. Cihelka																														
105	AZ - Brawley Wash -NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D12)	D.13 (.docx p. 13)	Overall, this flood damage reduction project does not seem to reduce flood damages significantly as evidenced by the level of residual damages in with-project conditions (across the various benefit categories).It is not clear what is contributing to these residual damages as well as what annual exceedance probabilities they are associated.Recommend providing clarity and rectifying the issue.Reference: Professional Judgement	NRCS	NWMC	Y	The project aims to restore natural drainage patterns in the study area by implementing the preferred alternative actions in smaller sections of the study area, creating a host of benefits for the study area such as reduced flood damage, improved rangeland and soil health, native habitat restoration. It is important to keep in mind that while reduced flood damage benefit is quantified - the other project benefits are not quantified. The Preferred Alternative optimizes the tradeoffs between net monetary benefits of the alternatives considered and environmental and social public benefits when non-monetized outputs are considered. These non-monetized benefits include restoring natural drainage flow patterns, reducing erosion, mitigating invasive species, carbon sequestration and climate regulation, ground water quality improvements and recharge, and avoiding negative flood-related impacts to grazing livestock. The residual damage is attributed to factors not corrected by the modelled alternatives.	K. Harpankar (GFT)	S. Cihelka																														
106	AZ - Brawley Wash -NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D13)	D.14 (.docx p. 14)	See comment above in D11 regarding weighting damages and correct methodology.	NRCS	NWMC	Y	Our estimation of expected annual damages is done with an appropriate method. Please refer to example EAD calculations provided in earlier comment responses for more details. (Comment Response # 288).	K. Harpankar (GFT)	S. Cihelka																														

No.	Document	Section	Page	Comment	Agency	Reviewer	Addressed (Y/N)	Comment Response	Response By	Blck
107	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D14)	D.14 (.docx p. 14)	It would appear that for some action alternatives, particularly for PGA3 (part of the watershed plan preferred alternative) that flood damages are being induced. Additionally, it does not seem as if the flood damage reduction benefits for agricultural are being included in the total flood damage reduction benefits, albeit they are a small relative amount. There is an emphasis on provisioning services of agricultural production, but seems it is not as an important consideration in the final results. Recommend providing clarity on the apparent induced damages and any associated issues with same, and seek Watershed Programs. Update throughout document and appendices as appropriate. Reference: NWPM 504.3.C.2 NREH Part 611.0100; 611.0200	NRCS	NWMC	Y	Given the relatively small magnitude of flood damage reduction benefits to Agriculture, they were not included in the calculation of total flood damage reduction benefits shown in Exhibit D14. It was checked that inclusion of these benefits does not change the benefit/cost ratio reported for each project alternative. Thus, the relatively small amount of induced flooding associated with PGA3 as pointed out is not indicative of any severe issues in the watershed.	K. Harpankar (GFT)	S. Cihetka
108	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Exhibit D14)	D.14 (.docx p. 14)	It would appear that for some action alternatives, particularly for PGA3 (part of the watershed plan preferred alternative) that flood damages are being induced. Additionally, it does not seem as if the flood damage reduction benefits for agricultural are being included in the total flood damage reduction benefits, albeit they are a small relative amount. There is an emphasis on provisioning services of agricultural production, but seems it is not as an important consideration in the final results. Recommend providing clarity on the apparent induced damages and any associated issues with same, and seek Watershed Programs. Update throughout document and appendices as appropriate. Reference: NWPM 504.3.C.2 NREH Part 611.0100; 611.0200;	NRCS	NWMC	Y	Repeated comment, please refer to response for Comment Response # 293.	K. Harpankar (GFT)	S. Cihetka
109	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.1 Economic Analysis (Appendix D - Table 1)	D.20 (.docx p. 20)	See comments in structure damage table above Exhibit D11.	NRCS	NWMC	Y	Please refer to Comment Response # 288.	K. Harpankar (GFT)	S. Cihetka
110	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.2.1 Hydrology and Hydraulic Alternatives Analysis Report (Section 2)	D.53 (.docx p. 53)	In the "Affected Environment: Current and Future Conditions" section of the main document, it is stated that no H&H modeling was conducted which seems to contradict this statement. Recommend rectifying inconsistencies and update throughout document and appendices as appropriate. Reference: NWPM 501.60.A.4.	NRCS	NWMC	Y	H&H models were not created for the Brawley Wash Plan-EA Project, the FEMA FLO-2D models were utilized from the Brawley and Black Wash Risk Analysis and Mapping Study (2023) and modified to incorporate proposed berm openings, water harvesting basins, diversion channels, and berm features for alternative floodplain mitigation simulations. The use of the existing H&H model was discussed in more detail in Section 2 of Appendix D.2, and the flood mitigation methods applied to the model was discussed in Section 3 of Appendix D.2.	S. Cihetka	B. Myers
111	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.2.1 Hydrology and Hydraulic Alternatives Analysis Report (Section 2)	D.53 (.docx p. 53)	These exhibits do not seem to be located where referenced. Inundation maps should be located in Appendix C and be provided as required as indicated in the National Watershed Program Manual. Recommend see other comments throughout document and appendix. Reference: NWPM 501.60.A.3; OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	See Response to Comment #211. Exhibits have been added to Appendix B within Subappendix D.2.	S. Cihetka	B. Myers
112	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.2.1 Hydrology and Hydraulic Alternatives Analysis Report (Appendix B)	D.72 (.docx p. 72)	Have not located these exhibits. See other comments.	NRCS	NWMC	Y	See Response to Comment #211. Exhibits have been added to Appendix B within Subappendix D.2.	S. Cihetka	B. Myers
113	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.3 Soils and Geology	D.78 (.docx p. 78)	Given the scale of erosion, sedimentation, and disrupted drainage patterns described in the project area, geologic input appears critical to understanding underlying causes and informing effective restoration strategies. Recommendation: Consider involving a qualified geologist during plan development and early design to ensure geologic factors—such as erosion, sedimentation, drainage, and construction-related impacts—are appropriately addressed. Their input will help ensure that restoration strategies are technically sound and grounded in site-specific conditions. Reference: 210 NEM531.2 (B) Responsibilities	NRCS	NWMC	Y	At the conceptual planning level of this study, discussions of erosion and sedimentation was internally discussed at a high-level by the appropriate subject matter experts to develop informed restoration measures and alternatives for flood prevention.	J. Keeling	B. Myers
114	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.6 - Table 21 - Summary of Resources of Concern	D.169 (.docx p. 169)	The purpose of the investigations and analyses report is to present information that supports the formulation, evaluation, and conclusions of the watershed plan. Repeating the same information found in the body of the watershed plan does provide any additional support for conclusions stated in the body of the watershed plan. Recommend removing the Summary of Resources of Concern from Appendix D. Reference: 2014 390 NWPM 501.45 D	NRCS	NWMC	Y	To conform with NWPM file and page guidelines, Table 21 is now Table 1 is located in Section 3.4 of the Plan-EA.	S. Cihetka	B. Myers
115	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.6 - Table 23 - Summary and Comparison of Alternative Plans	D.175 (.docx p. 175)	See Comments in the Alternatives section of the watershed plan in reference to the Summary and Comparison of Alternative Plans. Recommend including the Summary and Comparison of Alternative Plans the body of the watershed plan under the Alternatives section	NRCS	NWMC	Y	To conform with NWPM file and page guidelines, Tables and Figures from reference Reports (ie. Economic Analysis, H&H Report, etc...) were not included in the Plan-EA to minimize redundancies. Table 23 will not be added to Plan-EA to adhere to file size constraints.	S. Cihetka	B. Myers
116	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.6 - Table 25 - Cost Details for the Preferred Alternatives (Mitigation)	D.183 (.docx p. 183)	See Comment in the watershed agreement in reference to cost-share for mitigation.	NRCS	NWMC	Y	A footnote on mitigation costs has been added to the table. Mitigation costs include expenditures to cover cultural resource mitigation for archaeological sites found in the Tucker Road and Tortuga Ranch problem areas. Also included are costs for biological mitigation including preconstruction surveys and as needed relocation of burrowing owls. The mitigation cost used includes cultural resource and wildlife mitigation cost and thus PL 83-566 funding can be used for cost share for mitigation.	K. Harpankar (GFT)	S. Cihetka
117	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.6 - Table 27 - Estimated Cost Distribution of Preferred Alternative	D.184 (.docx p. 184)	These economic tables should not be placed so deep into the document but are better located in Appendix D.1 Economics. These are also required to be located in the preferred alternative section of the main document. Overall, the Appendix D economics should tell an "economic story" with best practices using tabulation of raw data and narratively told while simultaneously conveying the "story" transparently and cogently to those unfamiliar and ensuring requirements are completed. Recommend moving these required tables into Section D.1 and the preferred alternative section of the main document. Reference: NWPM 501.44.11; OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies	NRCS	NWMC	Y	Economic Table 27 was removed from Appendix D1.1 and placed in Table 2 in the Plan-EA.	K. Harpankar (GFT)	S. Cihetka
118	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.6 - Table 29 - Estimated Average Annual Costs	D.185 (.docx p. 185)	The amortization period is the evaluated life of the project and does not include the implementation/ construction phase. The implementation phase accounts for opportunity cost of capital by using the interest during construction method. Recommend correcting the estimates and update throughout appendices and document as appropriate. Reference: NWPM 501.55.A.3; 501.60.A.32	NRCS	NWMC	Y	Amortization calculation revised to use evaluated life of project and include opportunity cost of capital. (Table 30 in Appendix E).	K. Harpankar (GFT)	S. Cihetka
119	AZ - Brawley Wash - NWMC Working - Appendix_D_IA Report_9.2025.docx	Appendix D.6 - Table 29 - Estimated Average Annual Costs	D.185 (.docx p. 185)	O&M is a cost category required to be included in determining the total annualized cost of a project. There are requirements to operate and maintain the Federally funded project by the SLO as part of the watershed agreement with the Federal government. Having no difference in O&M costs between the baseline and action alternatives is not relevant. Also, O&M is not to be treated as an avoided cost benefit and is to be treated strictly as cost category to the action alternatives considered. Recommend including annualized O&M costs and updated throughout appendix and document as appropriate. Reference: OMB Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies; NWPM 501.80.8; 501.44.9	NRCS	NWMC	Y	The alternatives implemented with this project are not typical construction projects. The preferred project alternatives are restoration options with natural infrastructure components incorporated in one of the preferred alternatives. The alternatives restore abandoned agricultural land. The O&M costs are incurred for invasive species management and are not resulting specifically from implementing the preferred project alternatives. Therefore, the O&M costs are not being treated as an avoided cost benefit.	K. Harpankar (GFT)	S. Cihetka

No.	Document	Section	Page	Comment	Agency	Reviewer	Addressed (Y/N)	Comment Response	Response By	Blck
120	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	I (.docx p. i) Abstract - Non Discrimination Statement		Note that the abstract does not include an Ancestral Land Acknowledgement as required by 390 NWP 501.34.	NRCS	NHQ	Y	Acknowledged, Pima County Regional Flood Control District's Ancestral Land Acknowledgement will be added to the Plan-EA. "On behalf of Pima County residents, we honor the tribal nations who have served as caretakers of this land from time immemorial and respectfully acknowledge the ancestral homelands of the Tohono O'odham Nation and the multi-millennial presence of the Pascua Yaqui tribe within Pima County. Consistent with Pima County's commitment to diversity and inclusion, we strive toward building equal-partner relationships with Arizona's tribal nations."	S. Cihelka	E. Demaria (PCFCD)
121	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	iii (.docx p. 4) Watershed Agreement Cost Share Table (PA2A1) - Mitigation		State response does not resolve NWM comment. Regarding the state response about a footnote about mitigation costs, the footnote about cultural resources protection costs, required by 390 NWP 506.12(3), 506.12(4), and 506.12(7), is only present in the shared cost table in the Watershed Agreement but is not found elsewhere in the plan or appendices.	NRCS	NHQ	Y	Language to be added in addition to the footnote in Section 8.3 to note cultural resource protection costs are included in cost benefit analysis. In the Plan-EA, Table 28: Estimated Cost Distribution includes a note about total construction cost incorporating cultural and environmental mitigation costs. These costs are included in the total construction cost used for economic analysis.	S. Cihelka	B. Myers (NRCS)
122	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	iii (.docx p. 4) Watershed Agreement - Cost Share Table (PA6A3) - Mitigation		State response does not resolve NWM comment. Regarding the state response about a footnote about mitigation costs, the footnote about cultural resources protection costs, required by 390 NWP 506.12(3), 506.12(4), and 506.12(7), is only present in the shared cost table in the Watershed Agreement but is not found elsewhere in the plan or appendices.	NRCS	NHQ	Y	Mitigation measures, impacts to cultural and biological resources will be addressed through standard mitigation measures. Cultural resource mitigation will be developed through Section 106 consultation for identified archaeological sites, including those in the Tucker Road and Tortuga Ranch problem areas. Biological mitigation may include preconstruction surveys and, if necessary, relocation of species such as burrowing owls. The following language has been added to the Watershed Agreement - 5. Cost-share for Watershed Project Plans, to provide further clarification. "Associated mitigation costs are included in the project cost estimates and reflected in the watershed agreement cost-share table, consistent with PL 83-566 funding eligibility".	NRCS	B. Myers (NRCS)
123	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	xviii (.docx p. 19) OMB Mitigation, Minimization, and Avoidance Measures - Cultural Resources		State response does not resolve NWM comment.	NRCS	NHQ	Y	Acknowledged, language to be added to state construction fencing will be maintained and inspected throughout construction.	S. Cihelka	B. Myers (NRCS)
124	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	OMB Cultural and Historic Resources xviii (.docx p. 29)		The center column cell states, "There may be cultural or historic properties in the project area." The right column cell states, "Cultural resources, including historic properties have been identified in the Area of Potential Effects." Which is it? They may be present or they are present?	NRCS	NHQ	Y	Language will be revised to state historic properties are present in the Area of Potential Project Effects.	S. Cihelka	B. Myers (NRCS)
125	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	OMB Cultural and Historic Resources xviii (.docx p. 29)		390 NWP 501.60 indicates correspondence should be in Appendix A.	NRCS	NHQ	Y	Acknowledged, Section 106 correspondence will be placed in Appendix A.	S. Cihelka	B. Myers (NRCS)
126	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	OMB Cultural and Historic Resources xviii (.docx p. 29)		There appear to be inconsistencies among the tribes listed across multiple sections and appendices, including mismatches between those identified for consultation and those actually documented in the correspondence. Correspondence should be Appendix A per 390 NWP 501.60.	NRCS	NHQ	Y	Acknowledged, Section 106 correspondence will be placed in Appendix A.	S. Cihelka	B. Myers (NRCS)
127	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	3.4 Identification of Resource Concerns (Table 21 - Recreation) 14 (.docx p. 45)		Note that Recreation identified as a resource concern but the table then states that the project would not affect them. Contradictory. Note that in the row Paleontological Resources are not identified as a resource concern. The table then uses the same language as used for Recreation.	NRCS	NHQ	Y	Acknowledged, resource concern language for Paleontological Resources will be revised accordingly.	S. Cihelka	B. Myers (NRCS)
128	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	4.6.1.1 Cultural Context 29 (.docx p. 61)		There appear to be inconsistencies among the tribes listed across multiple sections and appendices, including mismatches between those identified for consultation and those actually documented in the correspondence. Correspondence should be Appendix A per 390 NWP 501.60.	NRCS	NHQ	Y	Acknowledged, will be revised accordingly. Tribes consulted with include Ak-Chin, GRIC, Hopi, MAT, PYT, Zuni, SRPMC, TON, TAT, WMAI, and YAN. FMYN was originally consulted with in 2020 during the project notification phase but they no longer are listed as having claims to this area based on the government to government toolkit.	NRCS	B. Myers (NRCS)
129	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	4.6.1.1 Cultural Context 29 (.docx p. 61)		The APEs do not appear to be adequately described or depicted in the plan, as key sections lack required detail, do not reference the survey reports where APEs are actually defined, and omit clear explanations of how the APEs relate to the problem areas.	NRCS	NHQ	Y	Acknowledged, APE description will be added to the Plan-EA.	S. Cihelka	B. Myers (NRCS)
130	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	4.6.1.4 Cultural Surveys 30 (.docx p. 62)		The plan does not appear to handle Class I and Class III survey materials in a compliant or complete manner, with missing or unredacted appendices and insufficient descriptions of recorded historic properties, preventing adequate assessment of effects.	NRCS	NHQ	Y	Acknowledged, will be revised accordingly. The redacted Class I, Class III, and Class III - new APE Cultural Reports are available in Appendix E.	S. Cihelka	B. Myers (NRCS)
131	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	4.6.1.4 Cultural Surveys 31 (.docx p. 63)		Changes made to the end of the last paragraph of Section 4.6.1.4 do resolve the NWM comment. State response is not relevant to the comment and, further, is in itself incorrect.	NRCS	NHQ	Y	NWM comment was resolved. The initial draft document did not contain all the Section 106 correspondence and was remediated and language revised to provide reviewer the Section 106 correspondence is located. Acknowledged, will be revised accordingly. The redacted Class I, Class III, and Class III - new APE Cultural Reports are available in Appendix E.	S. Cihelka	B. Myers (NRCS)
132	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	6.4.1 Cultural and Historic Resources (Mitigation Measures) 50 (.docx p. 82)		The plan does not appear to adequately address NWM concerns, as survey reports are incomplete or non-compliant and the plan lacks clear, project-specific avoidance measures and accurate text, preventing a sufficient explanation of how historic properties will be protected.	NRCS	NHQ	Y	The APE around the sites has been abandoned, and the sites will be marked for avoidance during construction with no construction or ground-disturbing activities permitted within the sites and 50-ft avoidance buffer.	NRCS	B. Myers (NRCS)
133	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	6.7.2.4.2 Cultural Resources 55 (.docx p. 87)		The plan does not appear to adequately address NWM concerns, as survey reports are incomplete or non-compliant and the plan lacks clear, project-specific avoidance measures and accurate text, preventing a sufficient explanation of how historic properties will be protected.	NRCS	NHQ	Y	Please see Comment Response #318. All historic properties will be marked for avoidance during the project.	S. Cihelka	B. Myers (NRCS)
134	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	7.3 List of Persons and Agencies Consulted 59 (.docx p 91)		There appear to be inconsistencies among the tribes listed across multiple sections and appendices, including mismatches between those identified for consultation and those actually documented in the correspondence. Correspondence should be Appendix A per 390 NWP 501.60.	NRCS	NHQ	Y	Please see Comment Response #314.	S. Cihelka	B. Myers (NRCS)
135	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	8.3 Minimization, Avoidance, and Compensatory Mitigation Measures 61 (.docx p. 93)		References to Appendix E, do not seem to exist	NRCS	NHQ	Y	Acknowledged, Appendix E references have been reviewed and corrected in the Plan-EA.	S. Cihelka	B. Myers (NRCS)
136	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	8.4.3.1.2 National Historic Preservation Act 62 (.docx p. 94)		State response does not resolve NWM comment. The Section 106 process for this project is complete. The process and its results are not presented adequately or accurately in this plan.	NRCS	NHQ	Y	NWM comment was resolved. The initial draft document did not contain all the Section 106 correspondence and was remediated and language revised to provide reviewer the Section 106 correspondence is located in Appendix A. Please see Comment Response #314.	S. Cihelka	B. Myers (NRCS)
137	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	11.2 Tribes 70 (.docx p. 102)		There appear to be inconsistencies among the tribes listed across multiple sections and appendices, including mismatches between those identified for consultation and those actually documented in the correspondence. Correspondence should be Appendix A per 390 NWP 501.60.	NRCS	NHQ	Y		S. Cihelka	B. Myers (NRCS)
138	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	Appendix E (Table 25 - Mitigation)		Although Section 8.5 mentions Table 29 in Appendix E and this comment mentions Table 25 in Appendix E, there do not seem to actually be a Table 29 or 25 in Appendix E.	NRCS	NHQ	Y	References for Table 25 and Table 29 have been transferred to Appendix E.	S. Cihelka	B. Myers (NRCS)

No.	Document	Section	Page	Comment	Agency	Reviewer	Addressed (Y/N)	Comment Response	Response By	Blck
139	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	Appendix E (Table 32 - Agency Consultation Record)		There appear to be inconsistencies among the tribes listed across multiple sections and appendices, including mismatches between those identified for consultation and those actually documented in the correspondence. Correspondence should be Appendix A per 390 NWP 501.60.	NRCS	NHQ	Y	Please see Comment Response #314.	S. Cihelka	B. Myers (NRCS)
140	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	Appendix D.6 - Table 25 - Cost Details for the Preferred Alternatives (Mitigation)		Although Section 8.5 mentions Table 29 in Appendix E and this comment mentions Table 25 in Appendix E, there do not seem to actually be a Table 29 or 25 in Appendix E.	NRCS	NHQ	Y	Please see Comment Response #324.	S. Cihelka	B. Myers (NRCS)
141	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Review Comments	Appendix D.6 - Table 27 - Estimated Cost Distribution of Preferred Alternative		Comment does not appear to be addressed.	NRCS	NHQ	Y	The Economic Analysis and respective tables assess the Project collectively, and does not delve into specifics of the Preferred Alternatives. The economic tables detailing the Preferred Alternatives are provided throughout Section 8 of the Plan-EA.	S. Cihelka	B. Myers (NRCS)
142	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	General/Statutory Items - 20% Agricultural/Rural Benefits - for Watershed Operations		Plan needs to clearly state the percentage of benefits to ag and/or rural communities. Conflicting ag benefits found throughout the plan. Plan states no benefits to agriculture (footnote on Table 4 and on page 65)but also states on page 5 there are reductions to irrigated farmland. Clarify ag benefits and the rural benefits must be outlined sufficiently and succinctly in the plan.	NRCS	NHQ	Y	Non-productive associated agricultural land is owned by the Sponsor that is being restored for flood mitigation and not for future agricultural land use. Agriculture benefits are not the primary purpose; however, secondary agricultural benefits would occur through reduced flood damages to irrigated farmland and associated infrastructure. Language has been added to Section 8.1 to emphasize the benefits to agricultural and rural communities.	S. Cihelka	B. Myers (NRCS)
143	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	Watershed Agreement (unsigned) - 2.		2. Cost share rates for land treatment meet policy and do not exceed rates under other national programs (PL 83-566 Section 1003). Clarify what measures are being install as "land treatment measure". Unable to determine if 100% federal cost share rate for land treatment measures exceeds rates under similar programs and is directly prohibited via PL 83-566 Section 1003.	NRCS	NHQ	Y	Measures to be installed for the preferred alternatives was detailed in Section 8.2, additional language has been added to section to further clarify cost share rates applied are consistent with PL-566 and does not exceed the federal cost share rate. Land treatment measures consist of conservation practices such as berm modifications, and related soil and water conservation treatments designed to restore natural sheet flow, reduce runoff concentration, and decrease erosion and sediment transport within the watershed. These measures are implemented as part of a coordinated watershed system supporting overall project performance. Cost-share rates are applied consistent with PL-566 authorities and do not exceed applicable limitations for similar practices under existing USDA conservation programs.	S. Cihelka	B. Myers (NRCS)
144	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	Watershed Agreement (unsigned) - 3.		3. The implementation period plus the project life for O&M equals the term of the Agreement. Section 14 of Watershed Agreement states the O&M term is 100 year. Modify and make consistent with plan EA.	NRCS	NHQ	Y	Acknowledged, all O&M term references of 100-years have been revised to note the project life/O&M term is 50-years with 2-years of implementation period.	S. Cihelka	B. Myers (NRCS)
145	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	Consultation, Coordination, and Public Participation - b.		b. Identification of cultural resources. Include brief descriptions of the historic properties and other cultural resources in the APEs in Section 4.6.1.4 of the plan. Note that descriptions must be Section 304 and 36 CFR 800.11(c) compliant. Section 4.6.1 briefly mentions the results, it does not provide an adequate description of the results and does not present an adequate assessment of potential effects of the alternatives to historic properties.	NRCS	NHQ	Y	Acknowledged, language to be added to expand on the cultural resources. Cultural Resource investigations, including Class III inventories, identified archaeological sites within portions of the Areas of Potential Effect (APEs). Project design has avoided all identified sites, and no ground-disturbing activities are expected to impact eligible or potentially eligible historic properties. NRCS has completed consultation under Section 106 of the National Historic Preservation Act. A determination of No Historic Properties Affected has been made for the undertaking.	S. Cihelka	B. Myers (NRCS)
146	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	Consultation, Coordination, and Public Participation - c.		c. Evaluation of cultural resources. 1. Revise all plan text to state NRCS made a finding of no historic properties affected. 2. Remove all references to SHPO's no-adverse-effect finding. 3. Move relevant correspondence from Appendix E to Appendix A. Note: NRCS' official finding is no historic properties affected. SHPO's "no adverse effect" stemmed from a different interpretation of the same avoidance commitment, and SHPO never objected to NRCS' finding. No correspondence shows agreement or disagreement. Therefore, the plan should clarify that the finding was NRCS'.	NRCS	NHQ	Y	1. Text has been revised to state the finding of no historic properties affected by NRCS. 2. References to SHPO's no-adverse-effect finding were removed. 3. Section 106 Correspondence was transferred from Appendix E to Appendix A.	S. Cihelka	B. Myers (NRCS)
147	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	The Preferred Alternative - 2.		2. Measures to be installed Revise all plan text to state NRCS made a finding of no historic properties affected.	NRCS	NHQ	Y	Acknowledged, text was revised to state NRCS findings of no historic properties affected.	S. Cihelka	B. Myers (NRCS)
148	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	The Preferred Alternative - 5.		5. Operation, maintenance, and replacement 1. OM&R cost are listed as \$0, there must be some type of cost associated with operating and maintaining the measures for the life of the project reflected in the plan for the sponsors. 2. Section 8.7 entitled Operation, Maintenance, and Replacement contains no information related to OM&R. In the preceding paragraph OM&R is addressed - move the appropriate section.	NRCS	NHQ	Y	1. Section 8.2, details the existing operations, maintenance, and replacement costs that are incurred annually by City of Tucson. Section 8.6, discusses how O&M management, coordination, and agreements between the PCRFCD, NRCS, and City of Tucson will be handled for the duration of the project. Will provide clarifying statements in the Plan-EA the O&M costs for the life of the project. 2. Acknowledged, OM&R text will be moved to the appropriate section.	S. Cihelka	B. Myers (NRCS)
149	NHQ_PR_Review_Comments_4.17.20 26.xlsx - Programmatic Review	The Preferred Alternative - 10.		10. Structural Tables It is not clear if there will be structural measures installed, that needs to be very clear and a structural table included for any structural measures.	NRCS	NHQ	Y	Acknowledged, language will be added to clearly state no structural measures will be installed for any preferred alternatives.	S. Cihelka	B. Myers (NRCS)

No.	Recorded Document	Q1: Contact Information					Response Received	Q2: Related to the Brawley Wash Watershed Plan and Environmental Assessment, what are your priority focus areas and concerns?	Q2 Response	Q3: Please provide any additional information or considerations that you believe would be important for the Brawley Wash Watershed Plan and Environmental Assessment project team to know.	Q3 Response
		Name	Title/Agency	Contact Email	Phone Number	Do you live near the project area?					
1	Brawley Wash Plan-EA Public Comment Period (closed 6/23/2026)	barbara rose	sonoranpermaculture.substack.com	beantreefarm@gmail.com	(520) 572-7221	east side of Rattlesnake Pass	6/5/2026, 1:36:47 pm	start at the top of each subwatershed of the Brawley, and work down from there! also see the work of Cuenca Los Ojos.	The District supports upland treatments in addition to Watershed Plan projects, and will employ them where appropriate and relevant. However, since the tops of the subwatersheds are outside of the project area, they will not be included in this plan. The District has your contact information and will take your suggestion into consideration for future projects.	Blank	No response needed.
2	Brawley Wash Plan-EA Public Comment Period (closed 6/23/2026)	Kristen McGurk	-	thriftdaddict1@gmail.com	-	Yes	6/9/2026, 10:29:17 am	Reduce residential flooding, address signage warning recreational horseback/ATV riders of flash flooding threats.	The addition of proposed signage for flash flooding threats is something the District will take into further consideration. We encourage property owner to discuss how they can protect their property with one of our Hydrologists. This service is free and available in person or over the telephone. This study helps us understand the severity of these risks in detail. District staff will evaluate potential sign locations and language.	We would like to maintain the integrity of this historic ranching area while improving safety and erosion control for future monsoons to come.	Thoughtful agricultural and ranching practices are frequently compatible uses of some floodprone areas. The goal of the plan to improve flow conveyance, attenuate flooding, and restore vegetation, which would all be a benefit to ranch activities.
3	Brawley Wash Plan-EA Public Comment Period (closed 6/23/2026)	NATHAN FORDAHL	-	njfordahl@gmail.com	(520) 869-5408	Yes	6/9/2026, 7:06:08 pm	I live directly south of problem area 6 on Maggies Farm. How will this impact me and my 5 acre parcel?	Based on the current planning study, immediately adjacent to the abandoned agricultural berm, there should be reduced ponding in the vicinity of your parcel. The exact extent of the benefit will be determined during a future design phase. We encourage property owners to discuss how to protect their property with one of our Hydrologists. This service is free and available in person or over the telephone. This study helps us understand these risks in detail.	Currently every time it rains for more than 15 min, my road becomes a muddy mess that even my 4x4 vehicles can't get out on.	The District understands that much of the road network consists of privately maintained unimproved roads. Road maintenance is the responsibility of the easement holders, and the District created guidance on how owners can improve these road so that flows can pass over the roads rather than capture the flows.
4	Brawley Wash Plan-EA Public Comment Period (closed 6/23/2026)	Rosemerry Svedberg	-	azkoether@live.com	(520) 449-3833	y	6/10/2026, 1:30:26 pm	Blank	No response needed.	Blank	No response needed.

No.	Recorded Document	Name	Title/Agency	Contact Email	Phone Number	Response Received	Comment	Author	Response	Response By
1	Brawley Meeting Questions.docx (Virtual Public Meeting 6/9/2026)	Joshua Rees	Pascua Yaqui Tribe Attorney	Not provided.	Not provided.	6/9/2026 (Zoom Chat)	The tribe has concerns regarding the plan and understands the project team may have talked to employees at Tortuga Ranch over this but believe there hasn't been any contact with the tribe administration. They are concerned about some implications to the tribe's water settlement negotiations.	Joshua Rees	Brett Myers provided contact information and emailed Joshua to schedule a follow up meeting.	B. Myers (NRCS-AZ)
2	Brawley Meeting Questions.docx (Virtual Public Meeting 6/9/2026)	Cody Jones	Not provided.	Not provided.	Not provided.	6/9/2026 (Zoom Chat)	Cody was unable to speak during the meeting and will complete the survey/comment form before it closes on June 23.	Cody Jones	Blank	No response needed.
3	Brawley Meeting Questions.docx (Virtual Public Meeting 6/9/2026)	Renee Flores	Not provided.	Not provided.	Not provided.	6/9/2026 (Zoom Chat)	Asked if the presentation will be available online.	Renee Flores	Gordley Group confirmed that the recording of the meeting would be available on the project website.	Gordley Group
4	Office of Attorney General - Chairman Singature Request on a letter for Public Comment Period for Brawley Wash Project.pdf	Julian Hernandez, Pascua Yaqui Tribe Chairman	Pascua Yaqui Tribe	-	(520) 883-5010	7/7/2026 (email)	On June 24, 2026, our Tribal Attorneys met with you to discuss the Draft EA and the improvements proposed near the Tribe's La Tortuga Ranch. The Draft EA made repeated references to "abandoned agricultural berms" that were proposed for removal or modification. The Tribe became concerned with these references because the Tribe has Certificated Water Rights at the La Tortuga Ranch that rely on the agricultural berms that were constructed on the Ranch to capture certain flood flows on the Ranch. To be clear, those agricultural berms have not been abandoned and the Ranch continues to rely on that agricultural infrastructure to capture Brawley Wash flood flows for use on the Ranch. Upon further discussion during our meeting, it became clear that the agricultural berms at La Tortuga are not at issue in the Draft EA, but rather, it is a levee constructed along the southwestern boundary of the Southern Avra Valley Storage and Recovery Project (SAVSARP) that is proposed for modification to address flood issues that are negatively affecting the Ranch. This levee is believed to be the source of flooding at the Ranch headquarters which has impacted the Tribe's health programs that are located there, including one flooding incident that resulted in the loss of livestock. The tribe is supportive of the planned efforts to address this important flood concern, provided that Marsteller Rd, which is located behind the levee, and Donaldson Ranch Rd., which crosses SAVSARP and serves as the Tribe's entrance point to the Ranch, are also protected from flooding if modifications are made to the levee. In order to avoid further conclusion in the Draft EA regarding this levee, the Tribe requests that it be clearly described as a levee and not be referred to, or grouped with references to, any other agricultural berm that is referenced for other locations considered in the Draft EA for flood improvements.	Julian Hernandez, Pascua Yaqui Tribe Chairman	The Draft Plan-EA has been reviewed and only one instance in Section 8.2 mentions "abandoned agricultural berm" in Problem Area No. 2 (Tortuga Ranch). This will be revised to read, "man-made earthen berm". Based on our meeting with the representatives of the Nation, they had requested a location map of the earthen berm.	J. Alwin (Stantec)

Brawley Wash Watershed Plan and Environmental Assessment – Preliminary

Appendix A – Comments and Responses

CONTENTS:

Attachment 1–Brawley Wash Plan–EA Preliminary Draft – Comment Response Log
(Rev. 07/13/2026)

Attachment 2 – Brawley Wash Plan–EA Public Outreach Comments

Attachment 3–Initial Section 106 Consultation on the Brawley Wash Plan PL-566
Watershed Flood Prevention Operations (WFPO) Project Tribal Letters and Affect
Response Letters (December 2020)

Attachment 4–Class I Cultural Resources Results Notification Letters (August 2024)

Attachment 5–Class III Cultural Resources Inventory Results Notification Letters
(January 2025)

Attachment 6–Section 106 Class III Cultural Resources –New APE Consultation
Letters Agency Consultation

Attachment 7–Pascua Yaqui Letter and Response–Brawley Wash Plan–EA (July 02,
2026)

Brawley Wash Watershed Plan and Environmental Assessment – Preliminary

Appendix A – Comments and Responses

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566 Watershed Flood Prevention Operations (WFPO) Project Tribal Letters and
Affect Response Letters (December 2020)**

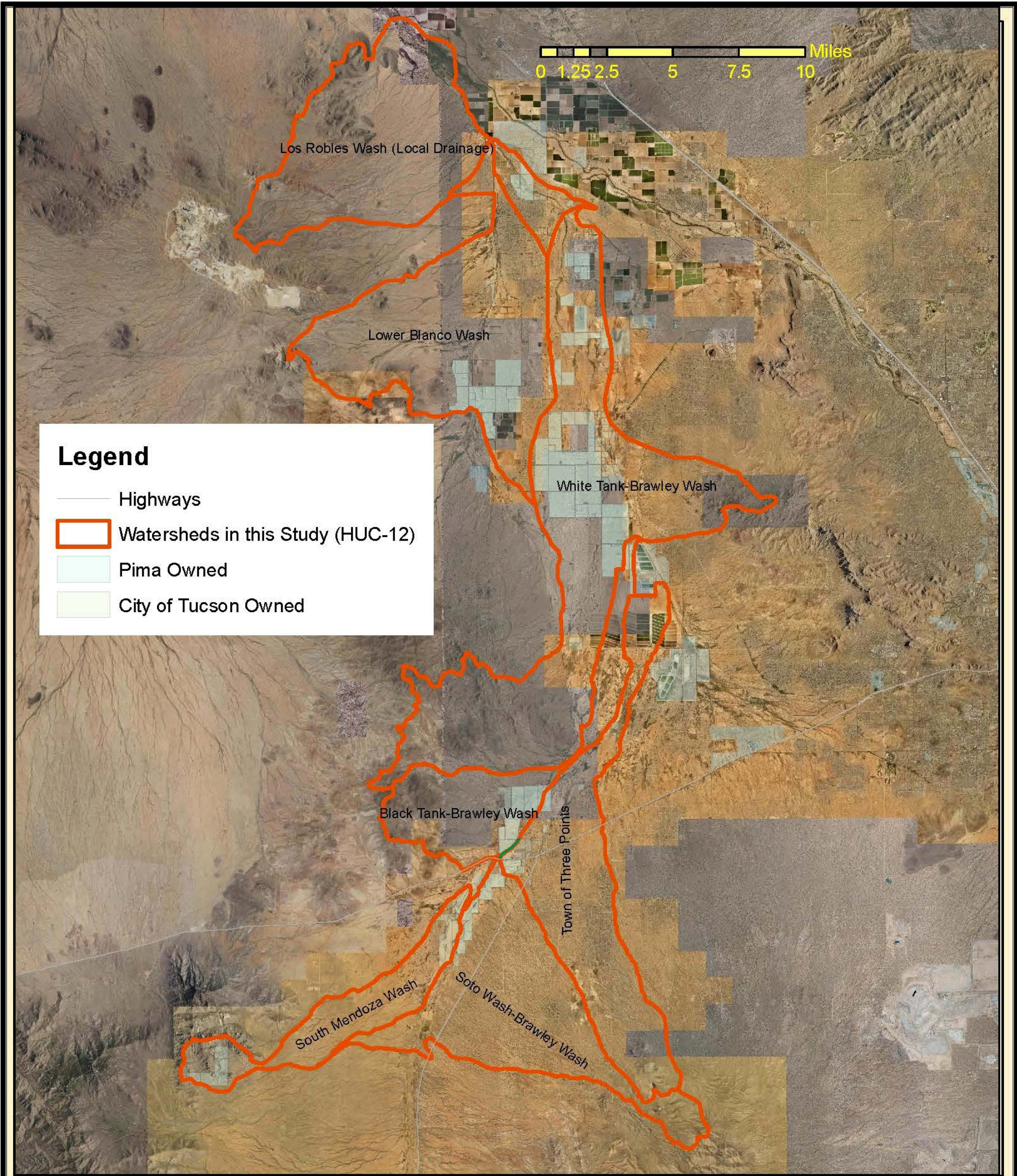
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Attachment 7–Pascua Yaqui Letter and Response–Brawley Wash Plan–EA (July 02,
2026)

Note: The Brawley Wash PL-566 Plan-EA map below is the Brawley Wash WFPO_map was provided as an enclosure to all the Agencies listed in Table 7-1 Agencies Consultation Record.



\\gislib\rfcd\templates\2015_8x11_exhibit-portrait_rfd.mxd

PIMA COUNTY
FLOOD CONTROL

Pima County Regional Flood Control District
201 N. Stone Ave. - 9th Floor
Tucson, Arizona 85701-1799
(520) 724-4600, FAX: (520) 724-4621
<http://www.rfcd.pima.gov>

Brawley Wash PL-566 Plan EA

0 50 100 200 300 400 Feet

Date: _____

The information depicted on this display is the result of digital analyses performed on a variety of databases provided and maintained by several governmental agencies. The accuracy of the information presented is limited to the collective accuracy of these databases on the date of the analysis. The Pima County Regional Flood Control District makes no claims regarding the accuracy of the information depicted herein.

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December 9, 2020

Hon. Robert Miguel
Chairman
Ak-Chin Indian Community
42507 W. Peters & Nall Road
Maricopa, Arizona 85138

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Chairman Miguel:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

Currently, the Brawley Wash PL-566 WFPO project is defined by a watershed that encompasses 198,000 acres within portions of T10S, R9E; T11S, R8E-R10E; T12S, R9E-R11E; T13S, R9E-R12E; T14S, R9E-R11E; T15S, R9E-R11E; T16S, R9E-R11E; and T17S, R8E-R11E, 17 miles west of Tucson, in Pima and Pinal Counties, Arizona. A project area of potential effects (APE) has not yet been defined, and the location of improvements or ground disturbance is not yet known.

The intent of this letter is to notify the State Historic Preservation Office (SHPO) and Native American Tribes with ancestrally-affiliated lands located within the watershed planning area (based on information provided in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) about the project. NRCS has identified the following Native American Tribes who may have interests in the project: The Ak-Chin Indian Community, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, San Carlos Apache Tribe, Tohono O'odham Nation, White Mountain Apache Tribe, and Yavapai Apache Nation. Additional consulting parties will be known once the project APE has been defined, and they will be included in Section 106 consultation.

The Honorable Chairman Robert Miguel

Page 2

Please review the preliminary planning information provided in this letter. NRCS will continue to consult with your office to complete the Section 106 process unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact NRCS State Archaeologist, Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.

Sincerely,

A handwritten signature in blue ink, reading "Keisha L. Tatem". The signature is fluid and cursive, with the first name "Keisha" and last name "Tatem" clearly legible.

Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Victoria A. Smith, Council Executive Secretary, Ak-Chin Indian Community, Maricopa, Arizona
Brenda Ball, Director, Environmental Protection Department, Ak-Chin Indian
Carmen Narcia, Cultural Resources Specialist, Ak-Chin Indian Community, Maricopa, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Phillip Jacquez, Acting District Conservationist, USDA-NRCS, Casa Grande, Arizona



United States Department of Agriculture

December 9, 2020

Hon. Bernadine Burnette
President
Fort McDowell Yavapai Nation
Post Office Box 17779
Fountain Hills, Arizona 85269

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable President Burnette:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

Currently, the Brawley Wash PL-566 WFPO project is defined by a watershed that encompasses 198,000 acres within portions of T10S, R9E; T11S, R8E-R10E; T12S, R9E-R11E; T13S, R9E-R12E; T14S, R9E-R11E; T15S, R9E-R11E; T16S, R9E-R11E; and T17S, R8E-R11E, 17 miles west of Tucson, in Pima and Pinal Counties, Arizona. A project area of potential effects (APE) has not yet been defined, and the location of improvements or ground disturbance is not yet known.

The intent of this letter is to notify the State Historic Preservation Office (SHPO) and Native American Tribes with ancestrally-affiliated lands located within the watershed planning area (based on information provided in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) about the project. NRCS has identified the following Native American Tribes who may have interests in the project: The Ak-Chin Indian Community, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, San Carlos Apache Tribe, Tohono O'odham Nation, White Mountain Apache Tribe, and Yavapai Apache Nation. Additional consulting parties will be known once the project APE has been defined, and they will be included in Section 106 consultation.

Natural Resources Conservation Service
230 N. First Avenue, Suite 509, Phoenix, Arizona 85003-1733
Tel. (602) 280-8801 • Fax (855) 844-9178

USDA is an equal opportunity provider, employer, and lender.

Please review the preliminary planning information provided in this letter. NRCS will continue to consult with your office to complete the Section 106 process unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact NRCS State Archaeologist, Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.

Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Dale Cody, President's Assistant, FMYN, Fountain Hills, Arizona
Karen Shaw, Director, Environmental Department, FMYN, Fountain Hill, Arizona
Albert Nelson, Culture Coordinator, FMYN, Fountain Hills, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Phillip Jacquez, District Conservationist, USDA-NRCS, Chandler, Arizona



United States Department of Agriculture

December 9, 2020

Hon. Stephen Roe Lewis
Governor
Gila River Indian Community
Post Office Box 97
Sacaton, Arizona 85147-0002

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Governor Lewis:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

Currently, the Brawley Wash PL-566 WFPO project is defined by a watershed that encompasses 198,000 acres within portions of T10S, R9E; T11S, R8E-R10E; T12S, R9E-R11E; T13S, R9E-R12E; T14S, R9E-R11E; T15S, R9E-R11E; T16S, R9E-R11E; and T17S, R8E-R11E, 17 miles west of Tucson, in Pima and Pinal Counties, Arizona. A project area of potential effects (APE) has not yet been defined, and the location of improvements or ground disturbance is not yet known.

The intent of this letter is to notify the State Historic Preservation Office (SHPO) and Native American Tribes with ancestrally-affiliated lands located within the watershed planning area (based on information provided in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) about the project. NRCS has identified the following Native American Tribes who may have interests in the project: The Ak-Chin Indian Community, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, San Carlos Apache Tribe, Tohono O'odham Nation, White Mountain Apache Tribe, and Yavapai Apache Nation. Additional consulting parties will be known once the project APE has been defined, and they will be included in Section 106 consultation.

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The Honorable Governor Lewis
Page 2

Please review the preliminary planning information provided in this letter. NRCS will continue to consult with your office to complete the Section 106 process unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact NRCS State Archaeologist, Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.

Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Diana Antone, Executive Assistant, Gila River Indian Community (GRIC), Sacaton, Arizona
Ronald Allison, Director, Gila River Indian Irrigation & Drainage District, GRIC, Sacaton, Arizona
David DeJong, Director, Pima-Maricopa Irrigation Project, GRIC, Sacaton, Arizona
Barnaby Lewis, Tribal Historic Preservation Officer, GRIC, Sacaton, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Phillip Jacquez, District Conservationist, USDA-NRCS, Chandler, Arizona

From: [Barnaby Lewis](#)
To: [Courtright, Scott - FPAC-NRCS, Flagstaff, AZ](#); [Larry Benallie Jr](#)
Subject: RE: NRCS watershed projects update
Date: Friday, May 14, 2021 3:26:12 PM

Thank you very much for the information, we appreciate your consideration in providing THPO the status of NRCS watershed projects.

From: Courtright, Scott - FPAC-NRCS, Flagstaff, AZ [mailto:Scott.Courtright2@usda.gov]
Sent: Friday, May 14, 2021 3:08 PM
To: Barnaby Lewis <Barnaby.Lewis2@gric.nsn.us>; Larry Benallie Jr <Larry.BenallieJr@gric.nsn.us>
Subject: NRCS watershed projects update

This email from Scott.Courtright2@usda.gov has been received from outside of GRIC. Please use caution before clicking on links, opening attachments or responding. If you are unsure about this email, you can call the sender to verify the email or call the MIS Help Desk for further assistance.

Good afternoon Barnaby and Larry,

I hope that you and your families are doing well. Mary-Ellen Walsh at the SHPO informed me that I should contact you with an update regarding the numerous watershed projects that NRCS is the lead federal agency, and for which the Gila River Indian Community received consultation letters late last year/early this year. As of now, each watershed planning team is evaluating locations and concepts for implementing the watershed improvement projects. For many they have not identified any locations yet, and no alternatives have been selected. For cultural resources, Class I background studies are being completed or will be completed. Once the Class I studies are done and numerous alternatives are selected for evaluation within each watershed study area, NRCS will distribute for Section 106 consultation the Class I background study for each project with alternatives that are being evaluated.

I would also like to point out that each project is at a different phase, and some do not have engineering or environmental consulting teams assembled, and no work has yet started.

I encourage you to contact me at any time if you have further questions or any concerns regarding the watershed projects.

Thank you, and have a nice weekend.

Scott

Scott Courtright
State Archaeologist



United States Department of Agriculture

December 9, 2020

Hon. Timothy L. Nuvangyaoma
Chairman
The Hopi Tribe
Post Office Box 123
Kykotsmovi, Arizona 86039

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Chairman Nuvangyaoma:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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Natural Resources Conservation Service
230 N. First Avenue, Suite 509, Phoenix, Arizona 85003-1733
Tel. (602) 280-8801 • Fax (855) 844-9178

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The Honorable Chairman Nuvangyaoma

Page 2

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Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Bruce Talawyma, Chief of Staff, Hopi Tribe, Kykotsmovi, Arizona
Clayton Honyumtewa, Director, DNR, Hopi Tribe, Kykotsmovi, Arizona
Stewart Koyiyumtewa, THPO, Hopi Tribe, Kykotsmovi, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Felix Nez, District Conservationist, USDA-NRCS, Holbrook, Arizona



United States Department of Agriculture

December 9, 2020

Hon. Gabe Aguilar
President
Mescalero Apache Tribe
Post Office Box 227
Mescalero, New Mexico 88340-0227

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable President Aguilar:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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The Honorable President Aguilar

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Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Holly Houghten, THPO, Mescalero Apache Tribe, Mescalero, New Mexico
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Alisha Phipps, Acting District Conservationist, USDA-NRCS, Tucson Field Office



December 9, 2020

Hon. Peter Yucupicio
Chairman
Pascua Yaqui Tribe
7474 South Camino de Oeste
Tucson, Arizona 85746

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Chairman Yucupicio:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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The Honorable Chairman Yucupicio

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Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

David Perez, Executive Assistant, Pascua Yaqui Tribe, Tucson, Arizona
Laura Berglan, Attorney General, Pascua Yaqui Tribe, Tucson, Arizona
Karl A. Hoerig, Tribal Historic Preservation Officer, Pascua Yaqui Tribe, Tucson, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Alisha Phipps, Acting District Conservationist, USDA-NRCS, Tucson, Arizona



December 9, 2020

Hon. Terry Rambler
Chairman
San Carlos Apache Tribe
Post Office Box 0
San Carlos, Arizona 85550

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Chairman Rambler:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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The Honorable Chairman Rambler

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Sincerely,

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Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Santana Dillion, Tribal Secretary, San Carlos Apache Tribe, San Carlos, Arizona
Dee Randal, Forest Manager, Department of Natural Resources, San Carlos, Arizona
Vernelda Grant, THPO, San Carlos Apache Tribe, San Carlos, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Millie Titla, District Conservationist, USDA-NRCS, San Carlos, Arizona



December 9, 2020

Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 West Washington Street
Phoenix, Arizona 85007-2935

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Dear Ms. Leonard:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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Ms. Kathryn Leonard

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Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Mary-Ellen Walsh, Archaeological Compliance Specialist, SHPO, Phoenix, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Alisha Phipps, Acting District Conservationist, USDA-NRCS, Tucson Field Office



December 9, 2020

Hon. Martin Harvier
President
Salt River Pima-Maricopa Indian Community
10005 East Osborn Road
Scottsdale, Arizona 85256

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable President Harvier:

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Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Patricia Rush, Executive Secretary, SRPMIC, Scottsdale, Arizona

Chris Horan, Manager, EPNR, SRPMIC, Scottsdale, Arizona

Shane Anton, Tribal Historic Preservation Officer, SRPMIC, Scottsdale, Arizona

Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona

Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona

David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona

Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona

Phillip Jacquez, District Conservationist, USDA-NRCS, Chandler, Arizona



December 9, 2020

Hon. Ned Norris Jr.
Chairman
Tohono O'odham Nation
Post Office Box 837
Sells, Arizona 85634

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Chairman Norris Jr.:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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The Honorable Chairman Norris Jr.

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Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Jesse Navarro, Governmental Affairs Assistant, Tohono O'odham Nation (TON), Sells, Arizona
Richard Saunders, Interim Executive Director, Natural Resources Department, TON, Sells, Arizona
Peter Steere, Tribal Historic Preservation Office Manager, TON, Sells, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Gilbert Two Two, District Conservationist, USDA-NRCS, Sells, Arizona



December 9, 2020

Hon. Gwendena Lee-Gatewood
Chairwoman
White Mountain Apache Tribe
Post Office Box 700
Whiteriver, Arizona 85941

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Chairwoman Lee-Gatewood:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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The Honorable Chairwoman Lee-Gatewood

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Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Debbie Paxson, Executive Assistant, White Mountain Apache Tribe, Whiteriver, Arizona
Richard Di Valentino, Program Manager, Land Operations Department, Whiteriver, Arizona
Mark Altaha, THPO, White Mountain Apache Tribe, Whiteriver, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Jan Pertruzzi, District Conservationist, USDA-NRCS, Whiteriver, Arizona



December 10, 2020

Hon. Jon Huey
Chairman
Yavapai-Apache Nation
2400 West Datsi Street
Camp Verde, Arizona 86322-8412

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Chairman Huey:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

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Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Matilda Cassadora, Executive Assistant, Yavapai-Apache Nation, Camp Verde, Arizona
Yolanda Trujillo, Manager, Agriculture Resource Department, Camp Verde, Arizona
Christopher Coder, Tribal Archaeologist, Yavapai-Apache Nation, Camp Verde, Arizona
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
Joey Dahms, Acting District Conservationist, USDA-NRCS, Flagstaff, Arizona



December 10, 2020

Hon. Val R. Panteah, Sr.
Governor
Pueblo of Zuni
Post Office Box 339
Zuni, New Mexico 87327-0339

Subject: Initial Section 106 Consultation on the Brawley Wash PL-566, Watershed Flood Prevention Operations (WFPO) Project

Honorable Governor Panteah:

The USDA Natural Resources Conservation Service (NRCS) has been requested to provide technical and financial assistance to the Pima County Flood Control District (PCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) in southern Arizona (see attached map). NRCS and PCFCD are in the process of evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCFCDs 2020 Floodplain Management Plan.

Currently, the Brawley Wash PL-566 WFPO project is defined by a watershed that encompasses 198,000 acres within portions of T10S, R9E; T11S, R8E-R10E; T12S, R9E-R11E; T13S, R9E-R12E; T14S, R9E-R11E; T15S, R9E-R11E; T16S, R9E-R11E; and T17S, R8E-R11E, 17 miles west of Tucson, in Pima and Pinal Counties, Arizona. A project area of potential effects (APE) has not yet been defined, and the location of improvements or ground disturbance is not yet known.

The intent of this letter is to notify the State Historic Preservation Office (SHPO) and Native American Tribes with ancestrally-affiliated lands located within the watershed planning area (based on information provided in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) about the project. NRCS has identified the following Native American Tribes who may have interests in the project: The Ak-Chin Indian Community, Fort McDowell Yavapai Nation, Gila River Indian Community, Hopi Tribe, Mescalero Apache Tribe, Pascua Yaqui Tribe, Pueblo of Zuni, Salt River Pima-Maricopa Indian Community, San Carlos Apache Tribe, Tohono O'odham Nation, White Mountain Apache Tribe, and Yavapai Apache Nation. Additional consulting parties will be known once the project APE has been defined, and they will be included in Section 106 consultation.

The Honorable Governor Panteah, Sr.

Page 2

Please review the preliminary planning information provided in this letter. NRCS will continue to consult with your office to complete the Section 106 process unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact NRCS State Archaeologist, Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.

Sincerely,



Keisha L. Tatem
State Conservationist

Enclosure:
Brawley Wash WFPO_map

cc (via email):

Vanessa Ukestine, Executive Assistant, Pueblo of Zuni, Zuni, New Mexico
Mark Harrington, Director, Division of Natural Resources, Pueblo of Zuni, Zuni, New Mexico
Kurt Dongoske, THPO, Pueblo of Zuni, Zuni, New Mexico
Scott Woodall, State Resource Conservationist, USDA-NRCS, Phoenix, Arizona
Scott Courtright, State Archaeologist, USDA-NRCS, Flagstaff, Arizona
David Beyman, State Conservation Engineer, USDA-NRCS, Phoenix, Arizona
Laverne Gene, Tribal Liaison, USDA-NRCS, Phoenix, Arizona
David Fisher, District Conservationist, USDA-NRCS, Springerville, Arizona

USDA-NRCS
Flagstaff Area Office
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(M) 928 460-0077

scott.courtright2@usda.gov

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Brawley Wash Watershed Plan and Environmental Assessment – Preliminary

Appendix A – Comments and Responses

CONTENTS:

Attachment 1–Brawley Wash Plan–EA Preliminary Draft – Comment Response Log
(Rev. 07/13/2026)

Attachment 2 – Brawley Wash Plan–EA Public Outreach Comments

Attachment 3–Initial Section 106 Consultation on the Brawley Wash Plan PL-566
Watershed Flood Prevention Operations (WFPO) Project Tribal Letters and Affect
Response Letters (December 2020)

**Attachment 4–Class I Cultural Resources Results Notification Letters (August
2024)**

Attachment 5–Class III Cultural Resources Inventory Results Notification Letters
(January 2025)

Attachment 6–Section 106 Class III Cultural Resources –New APE Consultation
Letters Agency Consultation

Attachment 7–Pascua Yaqui Letter and Response–Brawley Wash Plan–EA (July 02,
2026)

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Robert Miguel
Chairman
Ak-Chin Indian Community
42507 W. Peters & Nall Road
Maricopa, Arizona 85138

Honorable Chairman Miguel,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

PCRFCDD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O'odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five "Problem Areas" have been identified in which future project activities may occur. A Class I cultural resources inventory was prepared to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory is intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

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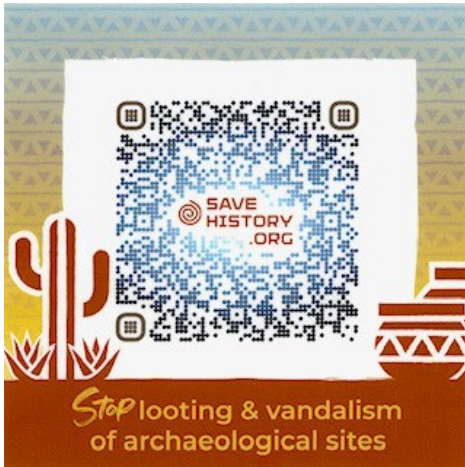
Because the project involves federal funding it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

SWCA Environmental Consultants (SWCA) prepared a Class I study of archaeological literature and historical maps for the five Problem Areas and a surrounding 1-mile radius. The results of this study are presented in a report prepared by Paul M. Rawson entitled *Class I Cultural Resources Inventory for the Brawley Wash Watershed Plan Alternatives, Pima County, Arizona*. This study revealed that there have been very few Class III surveys of the Problem Areas and almost all of these were completed over 10 years ago. There is only one previously documented archaeological site within the Problem Area designated as Cactus Avra Problem Area. SWCA completed archaeological sensitivity modeling for the Problem Areas and determined that archaeological sensitivity varies throughout the Problem Areas but is high in some locations. Historic maps indicate that historic-age agricultural features are likely present within the Problem Areas. In summary, Class III survey of the entirety of the Problem Areas APE will be necessary prior to project implementation. This will not be possible until after project plans are further developed and the APE is determined for each Problem Area.

Please review the enclosed report and the information provided in this letter, and please reply to let us know within 30 days whether you find the report adequate. We also invite you to let us know whether your Nation has any concerns regarding historic properties of religious or cultural importance to your community in the project area. If you have such concerns, we ask that within 30 days of receipt of this letter you provide NRCS with sufficient information about those properties to allow us to address your concerns during the project planning. If your office opts to participate in cultural resources consultation at a later date, NRCS would make a good faith effort to address any concerns. NRCS will continue to communicate with your office to complete the Section 106 process as this project proceeds unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.



Keisha L. Tatem
State Conservationist



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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Ms. Jodie Brown
Historic Preservation Officer
City of Tucson
201 North Stone Avenue
Tucson, Arizona 85726-7210

Dear Ms. Brown,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

PCRFCDD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O'odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five "Problem Areas" have been identified in which future project activities may occur. A Class I cultural resources inventory was prepared to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory is intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

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Township 12 South, Range 10 East, Section 25; Township 13 South, Range 10 East, Sections 5, 11, 13–15, and 22–26; Township 14 South, Range 11 East, Section 32; and T15S, R10E, Sections 21, 28, and 33 in Pima County, Arizona.

Because the project involves federal funding it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

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Keisha L. Tatem
State Conservationist

Scott Courtright
State Archaeologist
Ecological Sciences Team

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Arizona State Office
230 North 1st Avenue
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Phoenix, Arizona 85003

August 5, 2024

Honorable Stephen Roe Lewis
Governor
Gila River Indian Community
Post Office Box 97
Sacaton, Arizona 85147-0002

Honorable Governor Lewis,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Timothy L. Nuvangyaoma
Chairman
Hopi Tribe
Post Office Box 123
Kykotsmovi, Arizona 86039

Honorable Chairman Nuvangyaoma,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCF) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCF have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Thora Walsh Padilla
President
Mescalero Apache Tribe
Post Office Box 227
Mescalero, New Mexico 88340-0227

Honorable President Walsh Padilla,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Mr. Ian M. Milliken, M.A., RPA
Cultural Resources & Heritage Preservation Manager
Pima County Conservation Lands & Resources
201 N. Stone Avenue, 6th Floor
Tucson, Arizona 85701

Dear Mr. Milliken,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

From: [Ian Milliken](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#)
Cc: [Carrie Olson](#)
Subject: RE: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project
Date: Tuesday, August 6, 2024 11:23:54 AM

Hi Scott,

I have reviewed the report and have no comments, and concur on the it's adequacy.

Much appreciated,

Ian

IAN M. MILLIKEN, M.A., RPA

Cultural Resources & Heritage Preservation Manager

Pima County

Conservation Lands & Resources

(O) (520) 724-6684 | (C) (520) 576-3976

ian.milliken@pima.gov

From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>

Sent: Monday, August 5, 2024 12:49 PM

To: Ian Milliken <Ian.Milliken@pima.gov>

Cc: Carrie Olson <Carrie.Olson@pima.gov>; Courtright, Scott - FPAC-NRCS, AZ
<Scott.Courtright2@usda.gov>

Subject: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Mr. Milliken:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright
State Archaeologist
Ecological Sciences Team

USDA-NRCS | Arizona State Office
Flagstaff Area Office

1611 South Plaza Way
Flagstaff, AZ 86001-7102

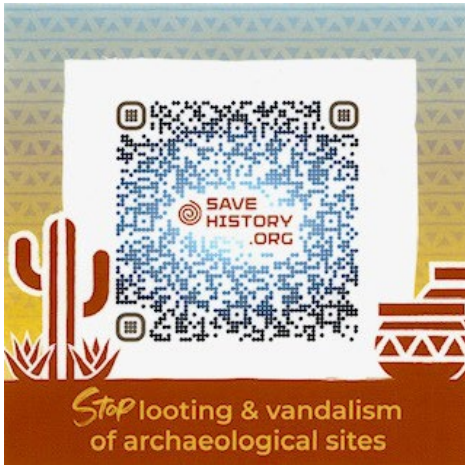
(O) 928 864-5538

(M) 928 460-0077

scott.courtright2@usda.gov

Office Hours:

7:30 a.m.–4:00 p.m. (Monday–Friday)



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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Peter Yucupicio
Chairman
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, Arizona 85746

Honorable Chairman Yucupicio,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCF) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCF have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

From: [Karl Hoerig](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#); [Julian Hernandez](#); [Oscar J. Flores](#)
Subject: Re: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project
Date: Monday, August 5, 2024 3:13:32 PM

Dear Scott,

Thank you for requesting consultation with the Pascua Yaqui Tribe regarding the Class I cultural resources study for the NCRS Brawley Wash Watershed project. I have just begun review of the report, but because this project potentially has direct impacts on Pascua Yaqui interests, I wanted to be sure it got to the right people in addition to me. Please note that following June 2024 Tribal Council elections Mr. Julian Hernandez is the Tribal Chairman and is the official contact for government to government consultation. I have also copied interim Attorney General Mr. O.J. Flores. I will get back with you regarding the cultural resources content of the report, and Mr. Hernandez or Mr. Flores may contact you if they have other concerns, particularly regarding how the proposed work at the Tortuga Ranch Problem Area might affect the adjacent PYT property.

With best regards,
Karl

Karl A. Hoerig, Ph.D.
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
5100 W. Calle Tetakusim, Room 130
Tucson, AZ 85757
(520) 883-5116
karl.hoerig@pascuayaqui-nsn.gov

From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Sent: Monday, August 5, 2024 1:24 PM
To: Peter Yucupicio <Peter.S.Yucupicio@pascuayaqui-nsn.gov>
Cc: Karl Hoerig <khoerig@pascuayaqui-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Subject: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project

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Honorable Chairman Yucupicio:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright
State Archaeologist
Ecological Sciences Team

USDA-NRCS | Arizona State Office
Flagstaff Area Office
1611 South Plaza Way
Flagstaff, AZ 86001-7102

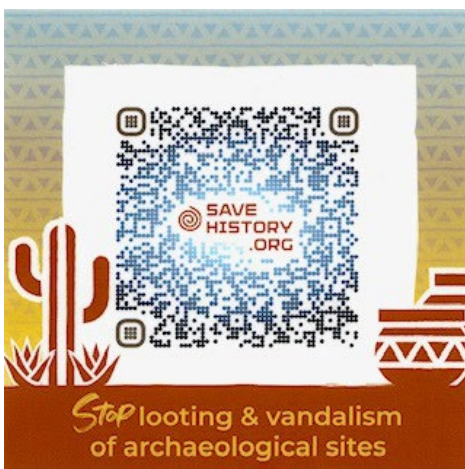
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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Ms. Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 West Washington Street
Phoenix, Arizona 85007-2935

Dear Ms. Leonard,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist



Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

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State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 West Washington Street
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Keisha L. Tatem
State Conservationist

SHPO concurs on the adequacy of the Class I report and looks forward to receiving continuing Section 106 consultations.



David Zimmerman, M.A.

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Martin Harvier
President
Salt River Pima-Maricopa Indian Community
10005 East Osborn Road
Scottsdale, Arizona 85256

Honorable President Harvier,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCF) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCF have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

From: [Eiselt, Sunday](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#); [Anton, Shane](#); peter.steere@tonation-nsn.gov
Cc: [Garcia-Lewis, Angela](#)
Subject: RE: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project
Date: Friday, August 9, 2024 11:29:27 AM
Attachments: [image002.png](#)

Dear Scott. The SRPMIC THPO has reviewed your consultation letter and the Class I report and finds it adequate but defers to the Tohono O’Odham Nation THPO as lead in the consultation process.

Thank you.

B. Sunday Eiselt Ph.D
THPO Archaeologist
Salt River Pima-Maricopa Indian Community
10,005 E. Osborn Road
Scottsdale, AZ 85256
Sunday.Eiselt@srpmic-nsn.gov
Office: (480) 362 3347



From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Sent: Monday, August 5, 2024 1:22 PM
To: Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>
Cc: Garcia-Lewis, Angela <Angela.Garcia-Lewis@SRPMIC-nsn.gov>; Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Subject: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project

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Honorable President Harvier:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

From: [Courtright, Scott - FPAC-NRCS, AZ](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#)
Subject: Brawley Wash-TON voicemail
Date: Wednesday, August 7, 2024 8:48:56 AM
Attachments: [voicemail-12944163744.m4a](#)

Scott Courtright
State Archaeologist
USDA-NRCS
Flagstaff Area Office
(M) 928 460-0077
Scott.courtright2@usda.gov

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Calvin Johnson
Chairman
Tonto Apache Tribe of Arizona
Tonto Apache Reservation No. 30
Payson, Arizona 85541

Honorable Chairman Johnson,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Please review the enclosed report and the information provided in this letter, and please reply to let us know within 30 days whether you find the report adequate. We also invite you to let us know whether your Nation has any concerns regarding historic properties of religious or cultural importance to your community in the project area. If you have such concerns, we ask that within 30 days of receipt of this letter you provide NRCS with sufficient information about those properties to allow us to address your concerns during the project planning. If your office opts to participate in cultural resources consultation at a later date, NRCS would make a good faith effort to address any concerns. NRCS will continue to communicate with your office to complete the Section 106 process as this project proceeds unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.



Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Verlon M. Jose
Chairman
Tohono O'odham Nation
Post Office Box 837
Sells, Arizona 85634

Honorable Chairman Jose,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

PCRFCDD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O'odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five "Problem Areas" have been identified in which future project activities may occur. A Class I cultural resources inventory was prepared to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory is intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Kasey Velasquez
Chairman
White Mountain Apache Tribe
Post Office Box 700
Whiteriver, Arizona 85941

Honorable Chairman Velasquez,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

From: [Mark Altaha](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#)
Subject: Re: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project
Date: Friday, August 16, 2024 10:15:07 AM
Attachments: [Section 106 letter.pdf](#)

Please refer to the attached tribal consultation letter.

Thank you,

Mark Altaha - THPO
White Mountain Apache Tribe
Historic Preservation Office
Fort Apache, Arizona

From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Sent: Monday, August 5, 2024 1:27 PM
To: Kasey Velasquez <KaseyVelasquez@wmat.us>
Cc: Mark Altaha <MarkAltaha@wmat.us>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Subject: Continuing Section 106 Consultation: Cultural Resources Class I–NRCS Brawley Wash Watershed Project

Honorable Chairman Velasquez:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright
State Archaeologist
Ecological Sciences Team

USDA-NRCS | Arizona State Office
Flagstaff Area Office
1611 South Plaza Way
Flagstaff, AZ 86001-7102

(O) 928 864-5538
(M) 928 460-0077
scott.courtright2@usda.gov

Office Hours:
7:30 a.m.–4:00 p.m. (Monday–Friday)

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Tanya Lewis
Chairwoman
Yavapai-Apache Nation
2400 West Datsi Street
Camp Verde, Arizona 86322-8412

Honorable Chairwoman Lewis,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCDD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCDD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

August 5, 2024

Honorable Arden Kucate
Governor
Pueblo of Zuni
Post Office Box 339
Zuni, New Mexico 87327-0339

Honorable Governor Kucate,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCF) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCF have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

PCRFCF is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O'odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five "Problem Areas" have been identified in which future project activities may occur. A Class I cultural resources inventory was prepared to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory is intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

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Keisha L. Tatem
State Conservationist

Brawley Wash Watershed Plan and Environmental Assessment – Preliminary

Appendix A – Comments and Responses

CONTENTS:

Attachment 1–Brawley Wash Plan–EA Preliminary Draft – Comment Response Log
(Rev. 07/13/2026)

Attachment 2 – Brawley Wash Plan–EA Public Outreach Comments

Attachment 3–Initial Section 106 Consultation on the Brawley Wash Plan PL-566
Watershed Flood Prevention Operations (WFPO) Project Tribal Letters and Affect
Response Letters (December 2020)

Attachment 4–Class I Cultural Resources Results Notification Letters (August 2024)

**Attachment 5–Class III Cultural Resources Inventory Results Notification
Letters (January 2025)**

Attachment 6–Section 106 Class III Cultural Resources –New APE Consultation
Letters Agency Consultation

Attachment 7–Pascua Yaqui Letter and Response–Brawley Wash Plan–EA (July 02,
2026)

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Robert Miguel
Chairman
Ak-Chin Indian Community
42507 W. Peters & Nall Road
Maricopa, Arizona 85138

Honorable Chairman Miguel,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Upon further analysis three Problem Areas were selected for additional study: Tortuga Ranch, Prickle Desert, and Tucker Road problem areas. For each of these three problem areas, the NRCS and PCRFCFCD defined an area of potential effects (APE) as the area in which ground-disturbing project activities would take place should any of the

alternatives move forward. The Tortuga Ranch, Prickle Desert, and Tucker Road problem areas APE are dispersed within a 15.5-mile by 5.8-mile area west of Tucson in Pima County, Arizona. The Tortuga Ranch Problem Area APE encompasses 24.8 acres of City of Tucson, Pima County, and private land and measures a maximum of 0.97 by 0.28 mile. It is located within portions of Township 14 South, Range 11 East, Sections 29, 32, and 33. The Prickle Desert Problem Area APE encompasses 79.5 acres of City of Tucson and private land. It measures a maximum of 2.09 by 1.02 miles and is within portions of Township 12 South, Range 10 East, Sections 14, 23, 25, and 26. The Tucker Road Problem Area APE encompasses 63 acres of City of Tucson and private land within portions of Township 13 South, Range 10 East, Sections 5 and 8. It measures a maximum of 1.11 by 0.82 miles.

Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

SWCA Environmental Consultants (SWCA) completed a Class III survey of the three Problem Area APEs in September of 2024. The results of this survey are presented in a report prepared by Eric S. Petersen and S. Jerome Hesse entitled *Class III Cultural Resources Inventory of Three Problem Areas for the Brawley Wash Watershed Plan Alternatives, West of Tucson, Pima County, Arizona*. This survey of 167.3 acres resulted in the identification of two archaeological sites and 19 isolated occurrences (IOs). The two archaeological sites are Hohokam artifact scatters (AZ AA:11:268[ASM] and AZ AA:16:680[ASM]). Site AZ AA:11:268(ASM) is located on City of Tucson and private land within the Tucker Road Problem Area APE. The large site contains between 1,000 and 5,000 artifacts and approximately 14 acres of the 52.2 acre-site are within the APE. Artifacts at the site consist of ceramics, flaked stone, and ground stone. Site AZ AA:16:680(ASM) is entirely within the Tortuga Ranch Problem Area APE on City of Tucson land and. The 0.3-acre site contains a small quantity of ceramics, flaked stone, and ground stone associated with a deflated fire-cracked-rock feature.

NRCS agrees with the SWCA recommendations and finds that AZ AA:11:268(ASM) and AZ AA:16:680(ASM) are both National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra Valley. It is recommended that both sites be avoided by ground-disturbing activities. The IOs do not meet the threshold for recording as archaeological sites under ASM recording guidelines. Each has been assessed under

relevant historic contexts and determined by NRCS to be ineligible for inclusion in the NRHP and ARHP. No preservation or avoidance of the IOs is necessary.

A select alternative has not yet been chosen and no funding has been allocated for any project-related activities within any of the Problem Area APEs. Future project construction may use federal, state, or local funds. If funding is allocated and a select alternative is chosen, engineering designs and project activities will be evaluated to determine if there are any impacts to any NRHP- and ARHP-eligible sites. If any NRHP- and ARHP-eligible sites cannot be avoided, it will be necessary to develop a memorandum of agreement (MOA) and historic properties treatment plan to mitigate any adverse impacts to historic properties within the APE. Additional consultation will occur should any of the alternatives move forward to construction.

Please review the enclosed report and the information provided in this letter, and please reply to let us know within 30 days whether you find the report adequate and if you agree with NRCS's findings of historic property eligibility. We also invite you to let us know whether your Nation has any concerns regarding historic properties of religious or cultural importance to your community in the project area. If you have such concerns, we ask that within 30 days of receipt of this letter you provide NRCS with sufficient information about those properties to allow us to address your concerns during the project planning. If your office opts to participate in cultural resources consultation at a later date, NRCS would make a good faith effort to address any concerns. NRCS will continue to communicate with your office to complete the Section 106 process as this project proceeds unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.



Keisha L. Tatem
State Conservationist



Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Ms. Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 West Washington Street
Phoenix, Arizona 85007-2935

Dear Ms. Leonard,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

PCRFCD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O'odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five "Problem Areas" have been identified in which future project activities may occur. A Class I cultural resources inventory for the five Problem Areas was previously sent to you on August 5, 2024, to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory was intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

Upon further analysis three Problem Areas were selected for additional study: Tortuga Ranch, Prickle Desert, and Tucker Road problem areas. For each of these three problem areas, the NRCS and PCRFC D defined an area of potential effects (APE) as the area in which ground-disturbing project activities would take place should any of the alternatives move forward. The Tortuga Ranch, Prickle Desert, and Tucker Road problem areas APE are dispersed within a 15.5-mile by 5.8-mile area west of Tucson in Pima County, Arizona. The Tortuga Ranch Problem Area APE encompasses 24.8 acres of City of Tucson, Pima County, and private land and measures a maximum of 0.97 by 0.28 mile. It is located within portions of Township 14 South, Range 11 East, Sections 29, 32, and 33. The Prickle Desert Problem Area APE encompasses 79.5 acres of City of Tucson and private land. It measures a maximum of 2.09 by 1.02 miles and is within portions of Township 12 South, Range 10 East, Sections 14, 23, 25, and 26. The Tucker Road Problem Area APE encompasses 63 acres of City of Tucson and private land within portions of Township 13 South, Range 10 East, Sections 5 and 8. It measures a maximum of 1.11 by 0.82 miles.

Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

SWCA Environmental Consultants (SWCA) completed a Class III survey of the three Problem Area APEs in September of 2024. The results of this survey are presented in a report prepared by Eric S. Petersen and S. Jerome Hesse entitled *Class III Cultural Resources Inventory of Three Problem Areas for the Brawley Wash Watershed Plan Alternatives, West of Tucson, Pima County, Arizona*. This survey of 167.3 acres resulted in the identification of two archaeological sites and 19 isolated occurrences (IOs). The two archaeological sites are Hohokam artifact scatters (AZ AA:11:268[ASM] and AZ AA:16:680[ASM]). Site AZ AA:11:268(ASM) is located on City of Tucson and private land within the Tucker Road Problem Area APE. The large site contains between 1,000 and 5,000 artifacts and approximately 14 acres of the 52.2 acre-site are within the APE. Artifacts at the site consist of ceramics, flaked stone, and ground stone. Site AZ AA:16:680(ASM) is entirely within the Tortuga Ranch Problem Area APE on City of Tucson land and. The 0.3-acre site contains a small quantity of ceramics, flaked stone, and ground stone associated with a deflated fire-cracked-rock feature.

NRCS agrees with the SWCA recommendations and finds that AZ AA:11:268(ASM) and AZ AA:16:680(ASM) are both National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra

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Keisha L. Tatem
State Conservationist

SHPO Concurs on the adequacy of the Class III survey report and determinations of eligibility for sites AZ AA:11:268(ASM) and AZ AA:16:680(ASM). SHPO looks forward to receiving continuing Section 106 consultation for this undertaking.



David Zimmerman, M.A.
Archaeological Compliance Specialist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Patrick D. Lyons, Ph.D.
Director
Arizona State Museum
The University of Arizona
Post Office Box 210026
Tucson, Arizona 85721-0026

Dear Dr. Lyons:

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Keisha L. Tatem
State Conservationist

From: [Plummer, Shannon D - \(splummer\)](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#)
Cc: [Fiocoprile, Emily A - \(efioccop\)](#)
Subject: RE: NRCS Section 106 Consultation: Class III Survey—Brawley Wash Watershed Project (AP-2024-0455)
Date: Monday, February 3, 2025 10:57:06 AM
Attachments: [image001.png](#)
[ASM_request_revision_concurrent_review_ap-2024-0455.pdf](#)

Hello again, Scott!

The Arizona State Museum (ASM) has reviewed *Class III Cultural Resources Inventory of Three Problem Areas of the Brawley Wash Watershed Plan Alternatives, West of Tucson, Pima County, Arizona* by E.S. Petersen and S.J. Hesse of SWCA Environmental Consultants, dated November 2024.

ASM concurs that if AZ AA:11:268(ASM) and AZ AA:16:680(ASM) should be either avoided or mitigated per an ASM-approved historic properties treatment plan (if on city, county, or state land).

ASM has found minor errors in the report draft (ASM Accession AP-2024-0455). Please provide the attached Request for Revision form to the consultant.

Thanks,
Shannon

Shannon Plummer, M.A., R.P.A.

Arizona Antiquities Act Administrator
Archaeological Permits Office | Arizona State Museum | University of Arizona
520-621-4795
www.statemuseum.arizona.edu

Mailing address for USPS mail:

Permits Office
Arizona State Museum
University of Arizona
P.O. Box 210026
Tucson, AZ 85721

Mailing address for deliveries by courier (e.g., FedEx, UPS):

Permits Office
Arizona State Museum, Bldg. 26, Rm. 308
University of Arizona, Central Receiving
3740 E. 34th Street
Tucson, AZ 85713

NOTICE TO SISTER INSTITUTIONS, RESEARCHERS, AND STUDENTS: We are preparing for major infrastructure upgrades to our 100-year-old north building to occur over the course of the next few years. The disruptions will, at different times, either impede or completely prevent our ability to provide access to the collections (loan requests, research requests, tour requests). We welcome your inquiries and will happily consider each one on a case-by-case basis, but please be advised that we may not be as accessible as we would like to be. We apologize in advance for any denials we may have to issue. Many thanks for your understanding. (This notice does not apply to **Archaeological Records Office appointments**, which will still be available during this time)

From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>

Sent: Friday, January 3, 2025 10:48 AM

To: Lyons, Patrick D - (plyons) <plyons@arizona.edu>

Cc: Plummer, Shannon D - (splummer) <splummer@arizona.edu>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>

Subject: [EXT] NRCS Section 106 Consultation: Class III Survey—Brawley Wash Watershed Project (AP-2024-0455)

External Email

Dear Dr. Lyons:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright
State Archaeologist
State Office | Ecological Sciences Team



1611 South Plaza Way, Flagstaff, AZ 86001

p: (928) 864-5538 c: (928) 460-0077

e: scott.courtright2@usda.gov | w: www.nrcs.usda.gov/Arizona

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Ms. Jodie Brown
Historic Preservation Officer
City of Tucson
201 North Stone Avenue
Tucson, Arizona 85726-7210

Dear Ms. Brown,

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Stephen Roe Lewis
Governor
Gila River Indian Community
Post Office Box 97
Sacaton, Arizona 85147-0002

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Timothy L. Nuvangyaoma
Chairman
Hopi Tribe
Post Office Box 123
Kykotsmovi, Arizona 86039

Honorable Chairman Nuvangyaoma,

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Thora Walsh Padilla
President
Mescalero Apache Tribe
Post Office Box 227
Mescalero, New Mexico 88340-0227

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Mr. Ian M. Milliken, M.A., RPA
Cultural Resources & Heritage Preservation Manager
Pima County Conservation Lands & Resources
201 N. Stone Avenue, 6th Floor
Tucson, Arizona 85701

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Keisha L. Tatem
State Conservationist

From: [Carrie Olson](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#); [Ian Milliken](#)
Subject: RE: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project
Date: Friday, January 3, 2025 12:18:47 PM
Attachments: [image001.png](#)

Thank you Scott!

Carrie Olson, Hydrologist III
Pima County Regional Flood Control District

From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Sent: Friday, January 3, 2025 11:06 AM
To: Ian Milliken <Ian.Milliken@pima.gov>
Cc: Carrie Olson <Carrie.Olson@pima.gov>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Subject: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project

CAUTION: This message and sender come from outside Pima County. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.

Dear Mr. Milliken,

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright
State Archaeologist
State Office | Ecological Sciences Team



1611 South Plaza Way, Flagstaff, AZ 86001
p: (928) 864-5538 c: (928) 460-0077
e: scott.courtright2@usda.gov | w: www.nrcs.usda.gov/Arizona

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Julian Hernandez
Chairman
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, Arizona 85746

Honorable Chairman Hernandez,

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Please review the enclosed report and the information provided in this letter, and please reply to let us know within 30 days whether you find the report adequate and if you agree with NRCS's findings of historic property eligibility. We also invite you to let us know whether your Nation has any concerns regarding historic properties of religious or cultural importance to your community in the project area. If you have such concerns, we ask that within 30 days of receipt of this letter you provide NRCS with sufficient information about those properties to allow us to address your concerns during the project planning. If your office opts to participate in cultural resources consultation at a later date, NRCS would make a good faith effort to address any concerns. NRCS will continue to communicate with your office to complete the Section 106 process as this project proceeds unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.



Keisha L. Tatem
State Conservationist

From: [Karl Hoerig](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#); [Julian Hernandez](#)
Subject: Re: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project
Date: Thursday, January 9, 2025 1:04:39 PM
Attachments: [image001.png](#)

Dear Scott,

Thank you to NRCS for providing this survey report and requesting consultation with the Pascua Yaqui Tribe. The PYT THPO concurs with the determination that the two sites identified in the surveyed areas are eligible for listing on the NRHP/ARHP. These ancestor places should be avoided as much as possible. The Tribe is particularly interested in continued close consultation regarding any activities planned for the Tortuga problem area because of the proximity to the Tribe's Tortuga Ranch and potential affects any work undertaken may have for the portions of the Ranch that are downstream from the problem area.

With warmest regards,
Karl

Karl A. Hoerig, Ph.D.
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
5100 W. Calle Tetakusim, Room 130
Tucson, AZ 85757
(520) 883-5116
karl.hoerig@pascuayaqui-nsn.gov

From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Sent: Friday, January 3, 2025 11:18 AM
To: Julian Hernandez <jhernandez1@pascuayaqui-nsn.gov>
Cc: Karl Hoerig <khoerig@pascuayaqui-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Subject: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project

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the content is safe!

Honorable Chairman Hernandez:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright
State Archaeologist
State Office | Ecological Sciences Team



1611 South Plaza Way, Flagstaff, AZ 86001

p: (928) 864-5538 c: (928) 460-0077

e: scott.courtright2@usda.gov | w: www.nrcs.usda.gov/Arizona

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Martin Harvier
President
Salt River Pima-Maricopa Indian Community
10005 East Osborn Road
Scottsdale, Arizona 85256

Honorable President Harvier,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawley Wash in Pima County southern Arizona. NRCS and PCRFCFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Upon further analysis three Problem Areas were selected for additional study: Tortuga Ranch, Prickle Desert, and Tucker Road problem areas. For each of these three problem areas, the NRCS and PCRFCFCD defined an area of potential effects (APE) as the area in which ground-disturbing project activities would take place should any of the

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Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

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NRCS agrees with the SWCA recommendations and finds that AZ AA:11:268(ASM) and AZ AA:16:680(ASM) are both National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra Valley. It is recommended that both sites be avoided by ground-disturbing activities. The IOs do not meet the threshold for recording as archaeological sites under ASM recording guidelines. Each has been assessed under

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Keisha L. Tatem
State Conservationist

From: [Eiselt, Sunday](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#); [Anton, Shane](#)
Cc: [Garcia-Lewis, Angela](#)
Subject: RE: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project
Date: Wednesday, January 8, 2025 3:32:49 PM
Attachments: [image002.png](#)
[image003.png](#)

Dear Scott. The SRPMIC THPO has reviewed your consultation documents for the Brawley Wash Watershed Project. The SRPMIC THPO defers to the Tohono O’Odham Nation THPO as lead in the consultation process.

Thank you

B. Sunday Eiselt
Acting THPO, THPO Archaeologist
Salt River Pima-Maricopa Indian Community
10,005 E. Osborn Road
Scottsdale, AZ 85256
Sunday.Eiselt@srpmic-nsn.gov
Office: (480) 362 3347



From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Sent: Friday, January 3, 2025 11:21 AM
To: Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>
Cc: Garcia-Lewis, Angela <Angela.Garcia-Lewis@SRPMIC-nsn.gov>; Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Subject: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project

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Honorable President Harvier:

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Thank you,

Scott Courtright
State Archaeologist
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1611 South Plaza Way, Flagstaff, AZ 86001

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e: scott.courtright2@usda.gov | w: www.nrcs.usda.gov/Arizona

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Calvin Johnson
Chairman
Tonto Apache Tribe of Arizona
Tonto Apache Reservation No. 30
Payson, Arizona 85541

Honorable Chairman Johnson,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Verlon M. Jose
Chairman
Tohono O'odham Nation
Post Office Box 837
Sells, Arizona 85634

Honorable Chairman Jose,

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Kasey Velasquez
Chairman
White Mountain Apache Tribe
Post Office Box 700
Whiteriver, Arizona 85941

Honorable Chairman Velasquez,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

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Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

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NRCS agrees with the SWCA recommendations and finds that AZ AA:11:268(ASM) and AZ AA:16:680(ASM) are both National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra Valley. It is recommended that both sites be avoided by ground-disturbing activities. The IOs do not meet the threshold for recording as archaeological sites under ASM recording guidelines. Each has been assessed under

relevant historic contexts and determined by NRCS to be ineligible for inclusion in the NRHP and ARHP. No preservation or avoidance of the IOs is necessary.

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Keisha L. Tatem
State Conservationist



White Mountain Apache Tribe

Office of Historic Preservation

PO Box 1032

Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

To: Keisha L. Tatem – NRCS State Conservationist

Date: January 03, 2025

Re: *Brawly Wash Watershed Flood Prevention Operation Plans*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; January 03, 2025. In regards to this, please refer to the following statement(s) below;

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed Brawly Watershed Flood Prevention plans on private lands to restore erosion control, structure removal, and the other conservation measures on Pima County, City of Tucson, Arizona..

Please be advised, we have reviewed the information provided, and we have determined the proposed flood restoration project will have a ***“No Adverse Effect”*** to the tribe’s cultural heritage resources. We concur with the proposed project plans.

Thank you for the continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark Altaha

White Mountain Apache Tribe – THPO
Historic Preservation Office

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Tanya Lewis
Chairwoman
Yavapai-Apache Nation
2400 West Datsi Street
Camp Verde, Arizona 86322-8412

Honorable Chairwoman Lewis,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

PCRFCFCD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O'odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five "Problem Areas" have been identified in which future project activities may occur. A Class I cultural resources inventory for the five Problem Areas was previously sent to you on August 5, 2024, to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory was intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

Upon further analysis three Problem Areas were selected for additional study: Tortuga Ranch, Prickle Desert, and Tucker Road problem areas. For each of these three problem areas, the NRCS and PCRFCFCD defined an area of potential effects (APE) as the area in which ground-disturbing project activities would take place should any of the

alternatives move forward. The Tortuga Ranch, Prickle Desert, and Tucker Road problem areas APE are dispersed within a 15.5-mile by 5.8-mile area west of Tucson in Pima County, Arizona. The Tortuga Ranch Problem Area APE encompasses 24.8 acres of City of Tucson, Pima County, and private land and measures a maximum of 0.97 by 0.28 mile. It is located within portions of Township 14 South, Range 11 East, Sections 29, 32, and 33. The Prickle Desert Problem Area APE encompasses 79.5 acres of City of Tucson and private land. It measures a maximum of 2.09 by 1.02 miles and is within portions of Township 12 South, Range 10 East, Sections 14, 23, 25, and 26. The Tucker Road Problem Area APE encompasses 63 acres of City of Tucson and private land within portions of Township 13 South, Range 10 East, Sections 5 and 8. It measures a maximum of 1.11 by 0.82 miles.

Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

SWCA Environmental Consultants (SWCA) completed a Class III survey of the three Problem Area APEs in September of 2024. The results of this survey are presented in a report prepared by Eric S. Petersen and S. Jerome Hesse entitled *Class III Cultural Resources Inventory of Three Problem Areas for the Brawley Wash Watershed Plan Alternatives, West of Tucson, Pima County, Arizona*. This survey of 167.3 acres resulted in the identification of two archaeological sites and 19 isolated occurrences (IOs). The two archaeological sites are Hohokam artifact scatters (AZ AA:11:268[ASM] and AZ AA:16:680[ASM]). Site AZ AA:11:268(ASM) is located on City of Tucson and private land within the Tucker Road Problem Area APE. The large site contains between 1,000 and 5,000 artifacts and approximately 14 acres of the 52.2 acre-site are within the APE. Artifacts at the site consist of ceramics, flaked stone, and ground stone. Site AZ AA:16:680(ASM) is entirely within the Tortuga Ranch Problem Area APE on City of Tucson land and. The 0.3-acre site contains a small quantity of ceramics, flaked stone, and ground stone associated with a deflated fire-cracked-rock feature.

NRCS agrees with the SWCA recommendations and finds that AZ AA:11:268(ASM) and AZ AA:16:680(ASM) are both National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra Valley. It is recommended that both sites be avoided by ground-disturbing activities. The IOs do not meet the threshold for recording as archaeological sites under ASM recording guidelines. Each has been assessed under

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

January 3, 2025

Honorable Arden Kucate
Governor
Pueblo of Zuni
Post Office Box 339
Zuni, New Mexico 87327-0339

Honorable Governor Kucate,

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Keisha L. Tatem
State Conservationist

From: [Peter Steere](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#)
Subject: RE: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project
Date: Monday, January 6, 2025 10:38:40 AM
Attachments: [image002.png](#)

Scott

Thank you

peter

From: Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Sent: Friday, January 3, 2025 11:22 AM
To: Peter Steere <Peter.Steere@tonation-nsn.gov>
Cc: Jefford Francisco <Jefford.Francisco@tonation-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <Scott.Courtright2@usda.gov>
Subject: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Honorable Chairman Jose:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright
State Archaeologist
State Office | Ecological Sciences Team



1611 South Plaza Way, Flagstaff, AZ 86001

p: (928) 864-5538 c: (928) 460-0077

e: scott.courtright2@usda.gov | w: www.nrcs.usda.gov/Arizona

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Brawley Wash Watershed Plan and Environmental Assessment – Preliminary

Appendix A – Comments and Responses

CONTENTS:

Attachment 1–Brawley Wash Plan–EA Preliminary Draft – Comment Response Log
(Rev. 07/13/2026)

Attachment 2 – Brawley Wash Plan–EA Public Outreach Comments

Attachment 3–Initial Section 106 Consultation on the Brawley Wash Plan PL-566
Watershed Flood Prevention Operations (WFPO) Project Tribal Letters and Affect
Response Letters (December 2020)

Attachment 4–Class I Cultural Resources Results Notification Letters (August 2024)

Attachment 5–Class III Cultural Resources Inventory Results Notification Letters
(January 2025)

**Attachment 6–Section 106 Class III Cultural Resources –New APE Consultation
Letters Agency Consultation**

Attachment 7–Pascua Yaqui Letter and Response–Brawley Wash Plan–EA (July 02,
2026)

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Gabriel Lopez
Chairman
Ak-Chin Indian Community
42507 W. Peters & Nall Road
Maricopa, Arizona 85138

Honorable Chairman Lopez,

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A Class III survey report for three of the Problem Areas—Tortuga Ranch, Prickle Desert, and Tucker Road—was sent to you on January 3, 2025. For each of these three problem areas, the NRCS and PCRFCFCD defined an area of potential effects (APE) as the area in which ground-disturbing project activities would take place should any of the alternatives move forward. The Tortuga Ranch, Prickle Desert, and Tucker Road problem areas APE are dispersed within a 15.5-mile by 5.8-mile area west of Tucson in Pima County, Arizona. The Tortuga Ranch Problem Area APE encompasses 24.8 acres of City of Tucson, Pima County, and private land. The Prickle Desert Problem Area APE encompasses 79.5 acres of City of Tucson and private land. The Tucker Road Problem Area APE encompasses 63 acres of City of Tucson and private land. Survey of the APE resulted in the documentation of two archaeological sites that are Hohokam artifact scatters (AZ AA:11:268[ASM] and AZ AA:16:680[ASM]). Within the Tucker Road Problem Area APE is site AZ AA:11:268(ASM) which encompasses 14 acres of City of Tucson and private land. Site AZ AA:16:680(ASM) encompasses 0.3 acre and is entirely within the Tortuga Ranch Problem Area APE on City of Tucson land. NRCS has determined that both sites are National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible.

The PCRFCFCD has committed to avoiding both sites. However, the location of AZ AA:11:268(ASM) within the Tucker Road Problem Area necessitated additional expansion of the original APE in order to adequately buffer the site and ensure it is avoided by any future ground-disturbing activities. The new APE within the Tucker Road Problem Area encompasses 35.2 acres of City of Tucson land and consists three rectangular parcels that abut the original APE. These measure a maximum of 0.57 by 0.35 mile.

SWCA Environmental Consultants (SWCA) completed additional Class III survey of the Tucker Road Problem Area APE in March of 2025. The results of this survey are presented in a report prepared by Eric S. Petersen and S. Jerome Hesse entitled *Additional Class III Cultural Resources Inventory of the Tucker Road Problem Area, Brawley Wash Watershed Plan Alternatives, West of Tucson, Pima County, Arizona*. This survey of 35.2 acres resulted in the identification of two archaeological sites and 15 isolated occurrences (IOs). One of the two archaeological sites is an extension of Hohokam artifact scatter site AZ AA:11:268(ASM). The site contains between 2,000 and 5,000 ceramics, flaked stone, and ground stone artifacts. Approximately 21.43 acres of the site are within the APE. The site has been determined eligible for the NRHP and ARHP. Also recorded during this recent survey is site AZ AA:11:270(ASM), a small prehistoric artifact scatter with 43 flaked stone, two biface tools, and one Hohokam plainware sherd. The site encompasses 0.24 acre and is unevaluated for the NRHP and ARHP.

NRCS previously determined that AZ AA:11:268(ASM) is NRHP and ARHP-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra Valley. NRCS further agrees with the SWCA recommendation and finds that site AZ AA:11:270(ASM) is unevaluated for the NRHP and ARHP and that further research would be necessary in order to make an eligibility determination. The IOs do not meet the threshold for recording as archaeological sites under ASM recording guidelines. Each has been assessed under relevant historic contexts and determined by NRCS to be ineligible for inclusion in the NRHP and ARHP. No preservation or avoidance of the IOs is necessary.

A select alternative has not yet been chosen and no funding has been allocated for any project-related activities within any of the Problem Area APEs. Future project construction may use federal, state, or local funds. The PRFCD has committed to avoiding all of the NRHP- and ARHP-eligible sites should the project move forward. Because all historic properties will be avoided by the project, the NRCS finding is “*No Historic Properties Affected*” in accordance with 36 CFR Part 800.

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Patrick D. Lyons, Ph.D.
Director
Arizona State Museum
The University of Arizona
Post Office Box 210026
Tucson, Arizona 85721-0026

Dear Dr. Lyons:

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River

Pima-Maricopa Indian Community, the Tohono O’odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

PCRFGD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O’odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five “Problem Areas” have been identified in which future project activities may occur. A Class I cultural resources inventory for the five Problem Areas was previously sent to you on August 5, 2024, to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory was intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

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Keisha L. Tatem
State Conservationist

From: [Courtright, Scott - FPAC-NRCS, AZ](#)
To: ["Goddard, Tim - \(tgoddard\)"](#)
Cc: [Fiocoprile, Emily A - \(efioccop\)](#); [ASM AAA Permits Office](#)
Subject: RE: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project (AP-2025-0130)
Date: Monday, June 23, 2025 7:42:00 AM
Attachments: [image001.png](#)
[image002.png](#)

Thank you, Tim.

I understand your request about possible future disturbance at either site and will include that as a requirement at the site(s) should it occur.

Scott

Scott Courtright

State Archaeologist
Arizona State Office



U.S. DEPARTMENT OF AGRICULTURE
Natural Resources Conservation Service
1611 South Plaza Way, Flagstaff, AZ, 86001
p: (928) 864-5538 | c: (928) 460-0077

From: Goddard, Tim - (tgoddard) <tgoddard@arizona.edu>
Sent: Friday, June 20, 2025 1:30 PM
To: Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>
Cc: Fiocoprile, Emily A - (efioccop) <efioccop@arizona.edu>; ASM AAA Permits Office <ASM-AAAPermits@arizona.edu>
Subject: Re: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project (AP-2025-0130)

The Arizona State Museum (ASM) has reviewed *Additional Class III Cultural Resources Inventory of the Tucker Road Problem Area, Brawley Wash Watershed Plan Alternatives, West of Tucson, Pima County, Arizona* by Eric Petersen and S. Jerome Hesse of SWCA Environmental Consultants, dated April 2025.

ASM concurs with NRCS's finding of "No Historic Properties Affected, with avoidance at AZ AA:11:268(ASM) and AZ AA:11:270(ASM). " ASM would request further with the stipulation that if there will be disturbance at the sites, then ASM would like testing at AZ AA:11:270(ASM) and monitoring and/or testing at AZ AA:11:268(ASM). depending on the level of disturbance"

ASM has no comments on the report draft (ASM Accession AP-2025-0130).

Tim

Timothy (Tim) Goddard, MAA, RPA

Interim Manager | Permits Office 520-621-4795

Manager | Archaeological Records Office 520-626-2715

Arizona State Museum | The University of Arizona

1013 E. University Blvd | PO Box 210026

Tucson, Arizona 85721-0026

www.statemuseum.arizona.edu



NOTICE TO SISTER INSTITUTIONS, RESEARCHERS, AND STUDENTS: We are preparing for major infrastructure upgrades to our 100-year-old north building to occur over the course of the next few years. The disruptions will, at different times, either impede or completely prevent our ability to provide access to the collections (loan requests, research requests, tour requests). We welcome your inquiries and will happily consider each one on a case-by-case basis, but please be advised that we may not be as accessible as we would like to be. We apologize in advance for any denials we may have to issue. Many thanks for your understanding.

We respectfully acknowledge the University of Arizona is on the land and territories of Indigenous peoples. Today, Arizona is home to 22 federally-recognized tribes, with Tucson being home to the O'odham and the Yaqui. Committed to diversity and inclusion, the University strives to build sustainable relationships with sovereign Native Nations and Indigenous communities through education offerings, partnerships, and community service.

From: Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>

Sent: Tuesday, May 20, 2025 10:39 AM

To: Lyons, Patrick D - (plyons) <plyons@arizona.edu>

Cc: Goddard, Tim - (tgoddard) <tgoddard@arizona.edu>; Courtright, Scott - FPAC-NRCS, AZ
<James.Courtright2@usda.gov>

Subject: [EXT] NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project (AP-2025-0130)

External Email

Dear Dr. Lyons:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project (AP-2025-0130) located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright

State Archaeologist
Arizona State Office



U.S. DEPARTMENT OF AGRICULTURE
Natural Resources Conservation Service
1611 South Plaza Way, Flagstaff, AZ, 86001
p: (928) 864-5538 | c: (928) 460-0077

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Ms. Jodie Brown
Historic Preservation Officer
City of Tucson
201 North Stone Avenue
Tucson, Arizona 85726-7210

Dear Ms. Brown,

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Stephen Roe Lewis
Governor
Gila River Indian Community
Post Office Box 97
Sacaton, Arizona 85147-0002

Honorable Governor Lewis,

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Timothy L. Nuvangyaoma
Chairman
Hopi Tribe
Post Office Box 123
Kykotsmovi, Arizona 86039

Honorable Chairman Nuvangyaoma,

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Thora Walsh Padilla
President
Mescalero Apache Tribe
Post Office Box 227
Mescalero, New Mexico 88340-0227

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Mr. Ian M. Milliken, M.A., RPA
Cultural Resources & Heritage Preservation Manager
Pima County Conservation Lands & Resources
201 N. Stone Avenue, 6th Floor
Tucson, Arizona 85701

Dear Mr. Milliken,

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Keisha L. Tatem
State Conservationist

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Julian Hernandez
Chairman
Pascua Yaqui Tribe
7474 S. Camino de Oeste
Tucson, Arizona 85746

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

From: [Karl Hoerig](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#); [Julian Hernandez](#)
Subject: Re: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project
Date: Monday, June 2, 2025 11:47:22 AM
Attachments: [image001.png](#)

Dear Scott,

Thank you to NRCS for providing the additional Class III survey report for the Brawley Wash Watershed Project. The PYT THPO finds the updated report to be adequate, and we concur with the determination of eligibility for the continuation of site AZ AA:11:268(ASM) in the new survey area, and the determination of site AZ AA:11:270(ASM) as unevaluated. With avoidance of ground disturbance or increased erosion due to alterations to water flow, a determination of "no historic properties affected" is appropriate.

As noted previously, The Pascua Yaqui Tribe remains particularly interested in the Tortuga Ranch problem area because of its proximity to, and effect on, the Tribe's Tortuga (Mochik) Ranch.

With best regards,
Karl

Karl A. Hoerig, Ph.D.
Tribal Historic Preservation Officer
Pascua Yaqui Tribe
5100 W. Calle Tetakusim, Room 130
Tucson, AZ 85757
(520) 883-5116
karl.hoerig@pascuayaqui-nsn.gov

From: Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>
Sent: Tuesday, May 20, 2025 10:47 AM
To: Julian Hernandez <jhernandez1@pascuayaqui-nsn.gov>
Cc: Karl Hoerig <khoerig@pascuayaqui-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>
Subject: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project

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organization! Do not click links, open attachments or reply, unless you recognize the sender's email address and know the content is safe!

Honorable Chairman Hernandez:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright

State Archaeologist
Arizona State Office



U.S. DEPARTMENT OF AGRICULTURE
Natural Resources Conservation Service
1611 South Plaza Way, Flagstaff, AZ, 86001
p: (928) 864-5538 | c: (928) 460-0077

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Ms. Kathryn Leonard
State Historic Preservation Officer
Arizona State Historic Preservation Office
1100 West Washington Street
Phoenix, Arizona 85007-2935

Dear Ms. Leonard,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River

Pima-Maricopa Indian Community, the Tohono O’odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

PCRFGD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O’odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five “Problem Areas” have been identified in which future project activities may occur. A Class I cultural resources inventory for the five Problem Areas was previously sent to you on August 5, 2024, to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory was intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

A Class III survey report for three of the Problem Areas—Tortuga Ranch, Prickle Desert, and Tucker Road—was sent to you on January 3, 2025. For each of these three problem areas, the NRCS and PCRFGD defined an area of potential effects (APE) as the area in which ground-disturbing project activities would take place should any of the alternatives move forward. The Tortuga Ranch, Prickle Desert, and Tucker Road problem areas APE are dispersed within a 15.5-mile by 5.8-mile area west of Tucson in Pima County, Arizona. The Tortuga Ranch Problem Area APE encompasses 24.8 acres of City of Tucson, Pima County, and private land. The Prickle Desert Problem Area APE encompasses 79.5 acres of City of Tucson and private land. The Tucker Road Problem Area APE encompasses 63 acres of City of Tucson and private land. Survey of the APE resulted in the documentation of two archaeological sites that are Hohokam artifact scatters (AZ AA:11:268[ASM] and AZ AA:16:680[ASM]). Within the Tucker Road Problem Area APE is site AZ AA:11:268(ASM) which encompasses 14 acres of City of Tucson and private land. Site AZ AA:16:680(ASM) encompasses 0.3 acre and is entirely within the Tortuga Ranch Problem Area APE on City of Tucson land. NRCS has determined that both sites are National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible.

The PCRFGD has committed to avoiding both sites. However, the location of AZ AA:11:268(ASM) within the Tucker Road Problem Area necessitated additional expansion of the original APE in order to adequately buffer the site and ensure it is avoided by any future ground-disturbing activities. The new APE within the Tucker Road Problem Area encompasses 35.2 acres of City of Tucson land and consists three rectangular parcels that abut the original APE. These measure a maximum of 0.57 by 0.35 mile.

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has been determined eligible for the NRHP and ARHP. Also recorded during this recent survey is site AZ AA:11:270(ASM), a small prehistoric artifact scatter with 43 flaked stone, two biface tools, and one Hohokam plainware sherd. The site encompasses 0.24 acre and is unevaluated for the NRHP and ARHP.

NRCS previously determined that AZ AA:11:268(ASM) is NRHP and ARHP-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra Valley. NRCS further agrees with the SWCA recommendation and finds that site AZ AA:11:270(ASM) is unevaluated for the NRHP and ARHP and that further research would be necessary in order to make an eligibility determination. The IOs do not meet the threshold for recording as archaeological sites under ASM recording guidelines. Each has been assessed under relevant historic contexts and determined by NRCS to be ineligible for inclusion in the NRHP and ARHP. No preservation or avoidance of the IOs is necessary.

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Please review the enclosed report and the information provided in this letter, and please reply to let us know within 30 days whether you find the report adequate and if you agree with NRCS's findings of historic property eligibility and project effects. NRCS will continue to communicate with your office to complete the Section 106 process as this project proceeds unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact NRCS State Archaeologist, Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.



Keisha L. Tatem
State Conservationist



Arizona State Office
 230 North 1st Avenue
 Suite 509
 Phoenix, Arizona 85003

May 16, 2025

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 State Historic Preservation Officer
 Arizona State Historic Preservation Office
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Keisha L. Tatem
State Conservationist

SHPO concurs on the report adequacy, determinations of site eligibility, and APE. SHPO concurs on a finding of “no adverse effect, based on avoidance of sites within the APE.”



David Zimmerman, M.A.
Arizona State Historic Preservation Office
July 3, 2025

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Martin Harvier
President
Salt River Pima-Maricopa Indian Community
10005 East Osborn Road
Scottsdale, Arizona 85256

Honorable President Harvier,

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

From: [Eiselt, Sunday](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#); [Anton, Shane](#)
Cc: [Garcia-Lewis, Angela](#)
Subject: RE: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project
Date: Wednesday, May 21, 2025 10:05:54 AM
Attachments: [image002.png](#)
[image003.png](#)

Dear Scott. The SRPMIC THPO has reviewed your consultation documents regarding the Brawley Wash Watershed Project. We defer to the Tohono O’Odham Nation THPO as lead in the consultation process for this project.

Thank you for consulting with the SRPMIC THPO.

B. Sunday Eiselt
Acting THPO, THPO Archaeologist
Salt River Pima-Maricopa Indian Community
10,005 E. Osborn Road
Scottsdale, AZ 85256
Sunday.Eiselt@srpmic-nsn.gov
Office: (480) 362 3347



From: Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>
Sent: Tuesday, May 20, 2025 10:49 AM
To: Anton, Shane <Shane.Anton@SRPMIC-nsn.gov>
Cc: Garcia-Lewis, Angela <Angela.Garcia-Lewis@SRPMIC-nsn.gov>; Eiselt, Sunday <Sunday.Eiselt@srpmic-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>
Subject: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project

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Honorable President Harvier:

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Thank you,

Scott Courtright

State Archaeologist

Arizona State Office



U.S. DEPARTMENT OF AGRICULTURE
Natural Resources Conservation Service

1611 South Plaza Way, Flagstaff, AZ, 86001

p: (928) 864-5538 | c: (928) 460-0077

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Calvin Johnson
Chairman
Tonto Apache Tribe of Arizona
Tonto Apache Reservation No. 30
Payson, Arizona 85541

Honorable Chairman Johnson,

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Verlon M. Jose
Chairman
Tohono O'odham Nation
Post Office Box 837
Sells, Arizona 85634

Honorable Chairman Jose,

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Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

PCRFCFCD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O’odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five “Problem Areas” have been identified in which future project activities may occur. A Class I cultural resources inventory for the five Problem Areas was previously sent to you on August 5, 2024, to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory was intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

From: [Peter Steere](#)
To: [Courtright, Scott - FPAC-NRCS, AZ](#)
Subject: RE: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project
Date: Tuesday, May 20, 2025 11:11:13 AM
Attachments: [image002.png](#)

Scott Courtright
USDA
NRCS

Thanks for sending report on Brawley Wash

We concur with recommendations to avoid the two cultural sites

I assume that this project area is not where Brawley Wash crosses the Tohono O'odham Nation on the Garcia Strip

There are significant fossil animal remains that show up in parts of Brawley Wash -,mammoth, mastodon other smaller creatures

Heavy equipment work in Brawley Wash could possibly uncover more

Do you plan to have a monitor out there during work on the wash

Peter L. Steere
THPO
Tohono O'odham Nation

From: Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>
Sent: Tuesday, May 20, 2025 10:51 AM
To: Peter Steere <Peter.Steere@tonation-nsn.gov>
Cc: Jefford Francisco <Jefford.Francisco@tonation-nsn.gov>; Courtright, Scott - FPAC-NRCS, AZ <James.Courtright2@usda.gov>
Subject: NRCS Continuing Section 106 Consultation: Class III Survey–Brawley Wash Watershed Project

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Honorable Chairman Jose:

Please see attached correspondence from State Conservationist Keisha Tatem pertaining to a Watershed Planning project located on city, county, and private land in Pima County, Arizona.

Thank you,

Scott Courtright

State Archaeologist

Arizona State Office



U.S. DEPARTMENT OF AGRICULTURE

Natural Resources Conservation Service

1611 South Plaza Way, Flagstaff, AZ, 86001

p: (928) 864-5538 | c: (928) 460-0077

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Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Kasey Velasquez
Chairman
White Mountain Apache Tribe
Post Office Box 700
Whiteriver, Arizona 85941

Honorable Chairman Velasquez,

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date



White Mountain Apache Tribe

Office of Historic Preservation

PO Box 1032

Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

To: Keisha L. Tatem – NRCS Arizona State Conservationist

Date: May 21, 2025

Re: *Watershed Flood Prevention Operation Project along Brawly Wash*

.....

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; May 16, 2025. In regard to this, please refer to the following statement(s) below;

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above proposed watershed flood prevention operation project along the Brawly Wash, in Tucson, Pima County, Arizona.

Please be advised, we have reviewed the information provided, and we have determined the proposed prevention project will have a ***“No Adverse Effect”*** on the tribe’s cultural heritage resources and/or historic properties.

Thank you for the continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark Altaha

White Mountain Apache Tribe – THPO
Historic Preservation Office

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Tanya Lewis
Chairwoman
Yavapai-Apache Nation
2400 West Datsi Street
Camp Verde, Arizona 86322-8412

Honorable Chairwoman Lewis,

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Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

Arizona State Office
230 North 1st Avenue
Suite 509
Phoenix, Arizona 85003

May 16, 2025

Honorable Arden Kucate
Governor
Pueblo of Zuni
Post Office Box 339
Zuni, New Mexico 87327-0339

Honorable Governor Kucate,

The USDA Natural Resources Conservation Service (NRCS) has been providing technical and financial assistance to the Pima County Regional Flood Control District (PCRFCD) to plan and implement a Watershed Flood Prevention Operation (WFPO) along the Brawly Wash in Pima County southern Arizona. NRCS and PCRFCD have been evaluating floodplain restoration, erosion control, structure removal, and other conservation measure identified in the PCRFCDs 2020 Floodplain Management Plan. The watershed is characterized by severe erosion and sedimentation in areas where constructed embankments and canals from abandoned agricultural lands are no longer being maintained, which affects natural flow patterns. This causes a loss of wildlife habitat and disrupts natural floodplains and drainage flow paths. The Brawley Wash Watershed Plan will evaluate floodplain restoration, erosion control, structure removal, and other conservation measures on Pima County, City of Tucson, and privately-owned lands within the planning area.

Because the project involves federal funding and is being done under the Watershed Protection and Flood Prevention Act of 1954 (Public Law 83-566) it is considered an undertaking subject to National Historic Preservation Act Section 106 review. Portions of the project are located on City of Tucson and Pima County land and it is also subjected to the Arizona Antiquities Act (Arizona Revised Statutes 41-841 et seq.); Pima County policy regarding the protection of cultural resources (Board of Supervisors Resolution 1983-104; Board of Supervisors Policy C3.17); City of Tucson Resolution No. 12443; and Administrative Directive for the Protection of Archaeological and Historical Resources in City Projects, City of Tucson, May 1999. Section 106 consulting parties identified by NRCS (based on information in the State Historic Preservation Office's Government to Government Consultation Toolkit website, <https://sites.google.com/view/az-consultation-toolkit/home>) are NRCS, Pima County, the City of Tucson, the Arizona State Museum (ASM), the Ak-Chin Indian Community, the Gila River Indian Community, the Hopi Tribe, the Mescalero Apache Tribe, the Pascua Yaqui Tribe, the Pueblo of Zuni, the Salt River Pima-Maricopa Indian Community, the Tohono O'odham Nation, the Tonto Apache Tribe, the White Mountain Apache Tribe, and the Yavapai Apache Nation.

PCRFCFCD is developing the plan in cooperation with Pima County, the City of Tucson, the Altar Valley Conservation Alliance, and a broad range of public stakeholders, including local governments, the Tohono O'odham Nation, agricultural and ranching interests, and conservation groups, through a public planning process. In working with stakeholders and in accordance with the Purpose and Need Statement for the Brawley Wash Watershed Plan Environmental Assessment, five "Problem Areas" have been identified in which future project activities may occur. A Class I cultural resources inventory for the five Problem Areas was previously sent to you on August 5, 2024, to provide specific information regarding previously conducted archaeological surveys and previously recorded cultural resources for each of these Problem Areas. The Class I cultural resources inventory was intended to facilitate further evaluation of project alternatives and assist the involved agencies in continuing the process of considering the potential for the project to impact cultural resources.

A Class III survey report for three of the Problem Areas—Tortuga Ranch, Prickle Desert, and Tucker Road—was sent to you on January 3, 2025. For each of these three problem areas, the NRCS and PCRFCFCD defined an area of potential effects (APE) as the area in which ground-disturbing project activities would take place should any of the alternatives move forward. The Tortuga Ranch, Prickle Desert, and Tucker Road problem areas APE are dispersed within a 15.5-mile by 5.8-mile area west of Tucson in Pima County, Arizona. The Tortuga Ranch Problem Area APE encompasses 24.8 acres of City of Tucson, Pima County, and private land. The Prickle Desert Problem Area APE encompasses 79.5 acres of City of Tucson and private land. The Tucker Road Problem Area APE encompasses 63 acres of City of Tucson and private land. Survey of the APE resulted in the documentation of two archaeological sites that are Hohokam artifact scatters (AZ AA:11:268[ASM] and AZ AA:16:680[ASM]). Within the Tucker Road Problem Area APE is site AZ AA:11:268(ASM) which encompasses 14 acres of City of Tucson and private land. Site AZ AA:16:680(ASM) encompasses 0.3 acre and is entirely within the Tortuga Ranch Problem Area APE on City of Tucson land. NRCS has determined that both sites are National Register of Historic Places (NRHP) and Arizona Register of Historic Places (ARHP)-eligible.

The PCRFCFCD has committed to avoiding both sites. However, the location of AZ AA:11:268(ASM) within the Tucker Road Problem Area necessitated additional expansion of the original APE in order to adequately buffer the site and ensure it is avoided by any future ground-disturbing activities. The new APE within the Tucker Road Problem Area encompasses 35.2 acres of City of Tucson land and consists three rectangular parcels that abut the original APE. These measure a maximum of 0.57 by 0.35 mile.

SWCA Environmental Consultants (SWCA) completed additional Class III survey of the Tucker Road Problem Area APE in March of 2025. The results of this survey are presented in a report prepared by Eric S. Petersen and S. Jerome Hesse entitled *Additional Class III Cultural Resources Inventory of the Tucker Road Problem Area, Brawley Wash Watershed Plan Alternatives, West of Tucson, Pima County, Arizona*. This survey of 35.2 acres resulted in the identification of two archaeological sites and 15 isolated occurrences (IOs). One of the two archaeological sites is an extension of Hohokam artifact scatter site AZ AA:11:268(ASM). The site contains between 2,000 and 5,000 ceramics, flaked stone, and ground stone artifacts. Approximately 21.43 acres of the site are within the APE. The site has been determined eligible for the NRHP and ARHP. Also recorded during this recent survey is site AZ AA:11:270(ASM), a small prehistoric artifact scatter with 43 flaked stone, two biface tools, and one Hohokam plainware sherd. The site encompasses 0.24 acre and is unevaluated for the NRHP and ARHP.

NRCS previously determined that AZ AA:11:268(ASM) is NRHP and ARHP-eligible and can contribute additional information within the context of Hohokam land use and settlement patterns in the Avra Valley. NRCS further agrees with the SWCA recommendation and finds that site AZ AA:11:270(ASM) is unevaluated for the NRHP and ARHP and that further research would be necessary in order to make an eligibility determination. The IOs do not meet the threshold for recording as archaeological sites under ASM recording guidelines. Each has been assessed under relevant historic contexts and determined by NRCS to be ineligible for inclusion in the NRHP and ARHP. No preservation or avoidance of the IOs is necessary.

A select alternative has not yet been chosen and no funding has been allocated for any project-related activities within any of the Problem Area APEs. Future project construction may use federal, state, or local funds. The PRFCD has committed to avoiding all of the NRHP- and ARHP-eligible sites should the project move forward. Because all historic properties will be avoided by the project, the NRCS finding is “*No Historic Properties Affected*” in accordance with 36 CFR Part 800.

Please review the enclosed report and the information provided in this letter, and please reply to let us know within 30 days whether you find the report adequate and if you agree with NRCS's findings of historic property eligibility and project effects. We also invite you to let us know whether your Nation has any concerns regarding historic properties of religious or cultural importance to your community in the project area. If you have such concerns, we ask that within 30 days of receipt of this letter you provide NRCS with sufficient information about those properties to allow us to address your concerns during the project planning. If your office opts to participate in cultural resources consultation at a later date, NRCS would make a good faith effort to address any concerns. NRCS will continue to communicate with your office to complete the Section 106 process as this project proceeds unless you inform us that your office does not wish to continue consultation. If you have any questions or concerns, please contact Mr. Scott Courtright, at (928) 864-5538 or via email at scott.courtright2@usda.gov.



Keisha L. Tatem
State Conservationist

Signature for Tribal concurrence

Date

Brawley Wash Watershed Plan and Environmental Assessment – Preliminary

Appendix A – Comments and Responses

CONTENTS:

Attachment 1–Brawley Wash Plan–EA Preliminary Draft – Comment Response Log
(Rev. 07/13/2026)

Attachment 2 – Brawley Wash Plan–EA Public Outreach Comments

Attachment 3–Initial Section 106 Consultation on the Brawley Wash Plan PL-566
Watershed Flood Prevention Operations (WFPO) Project Tribal Letters and Affect
Response Letters (December 2020)

Attachment 4–Class I Cultural Resources Results Notification Letters (August 2024)

Attachment 5–Class III Cultural Resources Inventory Results Notification Letters
(January 2025)

Attachment 6–Section 106 Class III Cultural Resources –New APE Consultation
Letters Agency Consultation

**Attachment 7–Pascua Yaqui Letter and Response–Brawley Wash Plan–EA
(July 02, 2026)**

PASCUA YAQUI TRIBE

OFFICE OF THE CHAIRMAN

July 2, 2026

Via Email

Joseph M. Alwin, Stantec

Joe.Alwin@stantec.com

Brett Meyers, USDA-NRCS

Brett.Meyers@usda.gov

Eleanora Demaria, Pima County Flood Control District

Eleonora.Demaria@pima.gov

Re: Pascua Yaqui Tribe's Comments to the Preliminary Brawley Wash Watershed Plan and Environmental Assessment dated May 2026

Dear Mr. Alwin, Mr. Meyers and Ms. Demaria:

On behalf of the Pascua Yaqui Tribe (Tribe), this letter provides the Tribe's written comments to the Preliminary Brawley Wash Watershed Plan and Environmental Assessment dated May 2026 (Draft EA).

On June 24, 2026, our Tribal Attorneys met with you to discuss the Draft EA and the improvements proposed near the Tribe's La Tortuga Ranch. The Draft EA made repeated references to "abandoned agricultural berms" that were proposed for removal or modification. The Tribe became concerned with these references because the Tribe has Certificated Water Rights at the La Tortuga Ranch that rely on the agricultural berms that were constructed on the Ranch to capture certain flood flows on the Ranch. To be clear, those agricultural berms have not been abandoned and the Ranch continues to rely on that agricultural infrastructure to capture Brawley Wash flood flows for use on the Ranch.

Upon further discussion during our meeting, it became clear that the agricultural berms at La Tortuga are not at issue in the Draft EA, but rather, it is a levee constructed along the southwestern boundary of the Southern Avra Valley Storage and Recovery Project (SAVSARP) that is proposed for modification to address flood issues that are negatively affecting the Ranch. This levee is believed to be the source of flooding at the Ranch headquarters which has impacted the Tribe's health programs that are located there, including one flooding incident that resulted in the loss of livestock.

The Tribe is supportive of the planned efforts to address this important flood concern, provided that Marstellar Rd. which is located behind the levee, and Donaldson Ranch Rd., which crosses SAVSARP and serves as the Tribe's entrance point to the Ranch, are also protected from flooding if modifications are made to the levee.

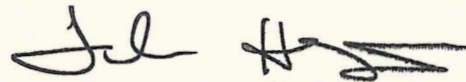
In order to avoid further confusion in the Draft EA regarding this levee, the Tribe requests that it be clearly described as a levee and not be referred to, or grouped with references to, any other agricultural berm that is referenced for other locations considered in the Draft EA for flood improvements.

In addition, please ensure that the following representatives of the Tribe are included in communications regarding your future planning, design and construction efforts for this levee:

Oscar (OJ) Flores, Attorney General, oscar.j.flores@pascuayaqui-nsn.gov
Joshua Rees, Asst. Attorney General, joshua.rees@pascuayaqui-nsn.gov
Robyn L. Interpreter, Water Counsel, rinterpreter@milawaz.com
Susan B. Montgomery, Water Counsel, smontgomery@milawaz.com
Teddy Kay Estes, Clinical Director, Sewa U'usim Community Partnership, La Tortuga Ranch, TKay.Estes@pascuayaqui-nsn.gov

Yours Truly,

PASCUA YAQUI TRIBE

A handwritten signature in black ink, appearing to read 'Julian Hernandez', with a stylized flourish at the end.

Julian Hernandez, Chairman

cc: Oscar (OJ) Flores, Attorney General, oscar.j.flores@pascuayaqui-nsn.gov
Joshua Rees, Asst. Attorney General, joshua.rees@pascuayaqui-nsn.gov
Robyn L. Interpreter, Water Counsel, rinterpreter@milawaz.com
Susan B. Montgomery, Water Counsel, smontgomery@milawaz.com
Teddy Kay Estes, Clinical Director, Sewa U'usim Community Partnership, La Tortuga Ranch, TKay.Estes@pascuayaqui-nsn.gov
Karl Hoerig, THPO, khoerig@pascuayaqui-nsn.gov

Cihelka, Susan

From: Robyn Interpreter <rinterpreter@milawaz.com>
Sent: Tuesday, July 14, 2026 3:29 PM
To: Myers, Brett - NRCS, Tucson, AZ; Joshua Rees
Cc: Eleonora Demaria
Subject: Re: Brawley Wash - NRCS

Thanks Brett. We really appreciate you time and attention.

Robyn L. Interpreter, Esq.
MONTGOMERY & INTERPRETER, PLC
3301 E. Thunderbird Rd.
Phoenix, AZ 85032
Ph: (480) 513-6825
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From: Myers, Brett - FPAC-NRCS, AZ <brett.myers@usda.gov>
Date: Tuesday, July 14, 2026 at 3:55 PM
To: Joshua Rees <joshua.rees@pascuayaqui-nsn.gov>; Robyn Interpreter <rinterpreter@milawaz.com>
Cc: Eleonora Demaria <eleonora.demaria@pima.gov>
Subject: RE: Brawley Wash - NRCS

Good afternoon,

Section 8.2, problem area No. 2 (Tortuga Ranch), has been revised to read “man-made earthen berm” replacing “abandoned agricultural berm”. I also included the Alternative Selection Memo which includes additional details and maps for Problem Area No. 2. In the draft plan EA maps can found in Appendix E, attachment 14.

We appreciate the Tribe taking the time to meet with us and also for providing comments on the draft plan EA. We will keep you apprised moving forward.

Please don't hesitate to reach out to either myself or Eleonora with any questions or concerns!

Best,

Brett Myers, MBA
Water Resources Planning Specialist
AZ NRCS | Watershed Team
Arizona State Office

 **U.S. DEPARTMENT OF AGRICULTURE**
Natural Resource Conservation Service
3241 N. Romero Rd, Tucson, Arizona, 85705
Office Number p: (520) 989-5629 | c: (928) 276-2160

From: Joshua Rees <joshua.rees@pascuayaqui-nsn.gov>
Sent: Tuesday, July 7, 2026 10:07 AM
To: Myers, Brett - FPAC-NRCS, AZ <brett.myers@usda.gov>; Robyn Interpreter <rinterpreter@milawaz.com>
Cc: Eleonora Demaria <eleonora.demaria@pima.gov>
Subject: RE: Brawley Wash - NRCS

I am sorry fir the delay. Here are the written comments of the Pascua Yaqui Tribe.

Joshua O. Rees
Assistant Attorney General
Office of the Attorney General
Pascua Yaqui Tribe
7777 S. Camino Huivisim Bldg C.
Tucson, Arizona 85757
Work: (520) 883-5104 Fax (520) 883-5084
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HighQ Link for Request for Legal Review Submissions:

<https://highq.pascuayaqui-nsn.gov/pascuayaquinsn/autoLogin.action?userID=152&linkParam=rsHWv98cpPupzkQuN672sA%3D%3D>

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From: Myers, Brett - FPAC-NRCS, AZ <brett.myers@usda.gov>
Sent: Wednesday, July 1, 2026 11:19 AM
To: Joshua Rees <joshua.rees@pascuayaqui-nsn.gov>; Robyn Interpreter <rinterpreter@milawaz.com>
Cc: Eleonora Demaria <eleonora.demaria@pima.gov>
Subject: Brawley Wash - NRCS

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Good afternoon,

During our June 24th meeting, we were informed that the tribe would be sending us a letter with their comments on the Brawley Wash Watershed Plan. As of today, we have not yet received the letter and wanted to follow up on its status. Could you please provide us with an estimated date when we can expect to receive the tribe's comments?

Thank you very much! We appreciate your help and look forward to your response.

Brett Myers, MBA

Water Resources Planning Specialist
AZ NRCS | Watershed Team
Arizona State Office



U.S. DEPARTMENT OF AGRICULTURE

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