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RE: Nogales Border Patrol Target Range - Lead Contamination Remediation Project

Date: March 22, 2018

Dear David,

I am a native of Nogales Arizona, a consulting (*Federally retired*) hydrologist with over 40 years of experience in the southwest, especially along the international border with Mexico. I am a certified floodplain manager. I serve on the IBWC SEACF, the Santa Cruz County Flood Control District Advisory Committee and on the Friends of the Santa Cruz River board of directors. I am member of the Association of State Floodplain Managers, the Arizona Floodplain Managers Association and the American Society of Civil Engineers.

As such, I am familiar with the hydrology, flood related and general environmental issues of the Santa Cruz River watershed, including Mariposa Wash and Nogales Wash in Ambos Nogales.

As a hydrologist looking ahead towards a safe and sustainable future, I want to provide brief but comprehensive and realistic comments regarding the proposed extent of lead clean-up at the Nogales Border Patrol (*BP*), Target Range.

Any lead contamination (*including any post-project residual*) of the soil, surface water, ground water or air threatens downstream and down gradient populations, commercial centers, high density residential zones, and Nogales High School, and all other downstream areas in Mariposa Canyon and receiving waters of Nogales Wash; as well as down-wind areas within our airshed.

The subject lead contamination is the obvious responsibility of BP. A Professional shooting range where lead bullets are collected and properly disposed of would have certainly been much cheaper than any clean-ups.

Our Homeland is not secure if this or any other contamination threatens our drinking water and breathing air, upon which the economic sustainability of Ambos Nogales depends.

I beg you to please consider the future of our predominately low-income Latino population, and take a **Good Hard Look** at the **Environmental Justice** for our residents as required by NEPA.

Many local citizens are concerned and objecting to the Border Patrol's pollution clean-up plans for this old firing range in Nogales. Numerous local citizens not only showed up at the hearing to hear about the plan, but also loudly and clearly insisted on a comprehensive clean-up: the plan as presented only covered the BP's leased property, but not the adjacent lands where toxic contamination from BP activities is even worse. Heavy metals and other poisonous chemicals on these sites can become airborne and get breathed in, as well as find their way into our groundwater, where we all get our drinking water.

We need to actively protect our environment—our air, water, and land—against interests that do not put the safety and future health of residents at the top of their concerns. After hearing loud and clear from these concerned citizens, the Border Patrol should have no choice but to expand its remediation plans to include all of the land they've contaminated. It is time to end the notion that the pursuit of money, convenience, or even defense gives anyone license to muck up the world for the rest of us.

Please require Border Patrol to expand its remediation plans to include all of the land they've contaminated. While we appreciate the mission and function of this Federal agency, it is only fair and just that those responsible be held accountable to remediate the geographic entirety of their irresponsible polluting actions.

Respectfully,

Ben Lomeli, Hydrologist, CFM.