

Finding of Suitability to Transfer 60-Acre Parcel, Camp Navajo Bellemont, Arizona

Prepared for

National Guard Bureau

Prepared by

**U.S. Army Corps of Engineers
Los Angeles District
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August 2013

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FINDING OF SUITABILITY TO TRANSFER 60-ACRE PARCEL AT CAMP NAVAJO, BELLEMONT, ARIZONA

1.0 INTRODUCTION

This Finding of Suitability to Transfer (FOST) documents the environmental suitability of a 60-acre parcel at Camp Navajo shown on Figures 1 and 2 for transfer from the National Guard Bureau (NGB) to the Arizona Department of Veterans Services (ADVS) for the construction of a veterans' cemetery.

This FOST is consistent with the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 120(h)(4) and Department of Defense policy.

2.0 PROPERTY DESCRIPTION

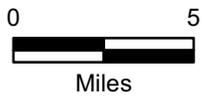
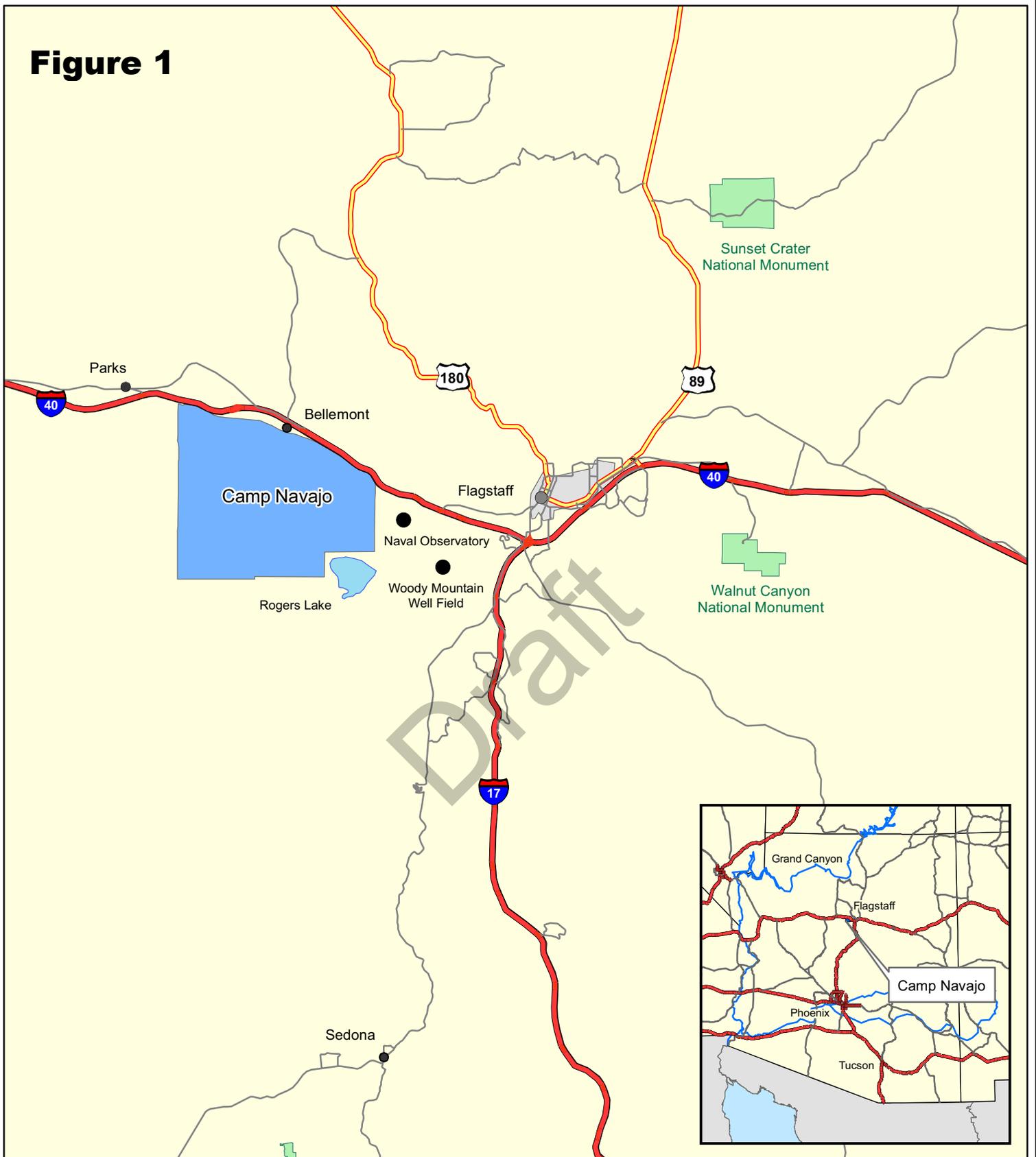
Camp Navajo is located in Bellemont, Coconino County, Arizona and encompasses 28,347 acres of land. The subject property totals approximately 60 acres (approximate center point coordinates: 35.2381, -111.8492) and is located on the northern boundary of Camp Navajo. See Figures 1, 2, and 3. The subject property is undeveloped and lies between railroad tracks to the north and east, an unnamed dirt road to the south, and forest land to the west. An active railroad line runs past the north of the subject property. See Attachment A for the legal description of the parcel.

3.0 ENVIRONMENTAL DOCUMENTATION

A determination of the environmental condition of the property based on the following reports:

- *Decision Document for Open Burn /Open Detonation Area Installation Restoration Program Site NAAD 10.* Prepared for the National Guard Bureau by MKM Engineers, Inc., July 21, 2006.
- *Phase I Environmental Site Assessment for the Proposed Camp Navajo Cemetery in Bellemont, Arizona.* Prepared for Arizona Department of Veterans' Services by SWCA Environmental Consultants, May 2012.
- *Northern Arizona Veterans' Memorial Cemetery Final Environmental Assessment.* Prepared for Arizona Department of Veterans Services by SWCA Environmental Consultants, April 2013.

Figure 1



Sources:
Brown & Caldwell, ESRI



Location Map, Camp Navajo, Belmont, Arizona



Figure 2

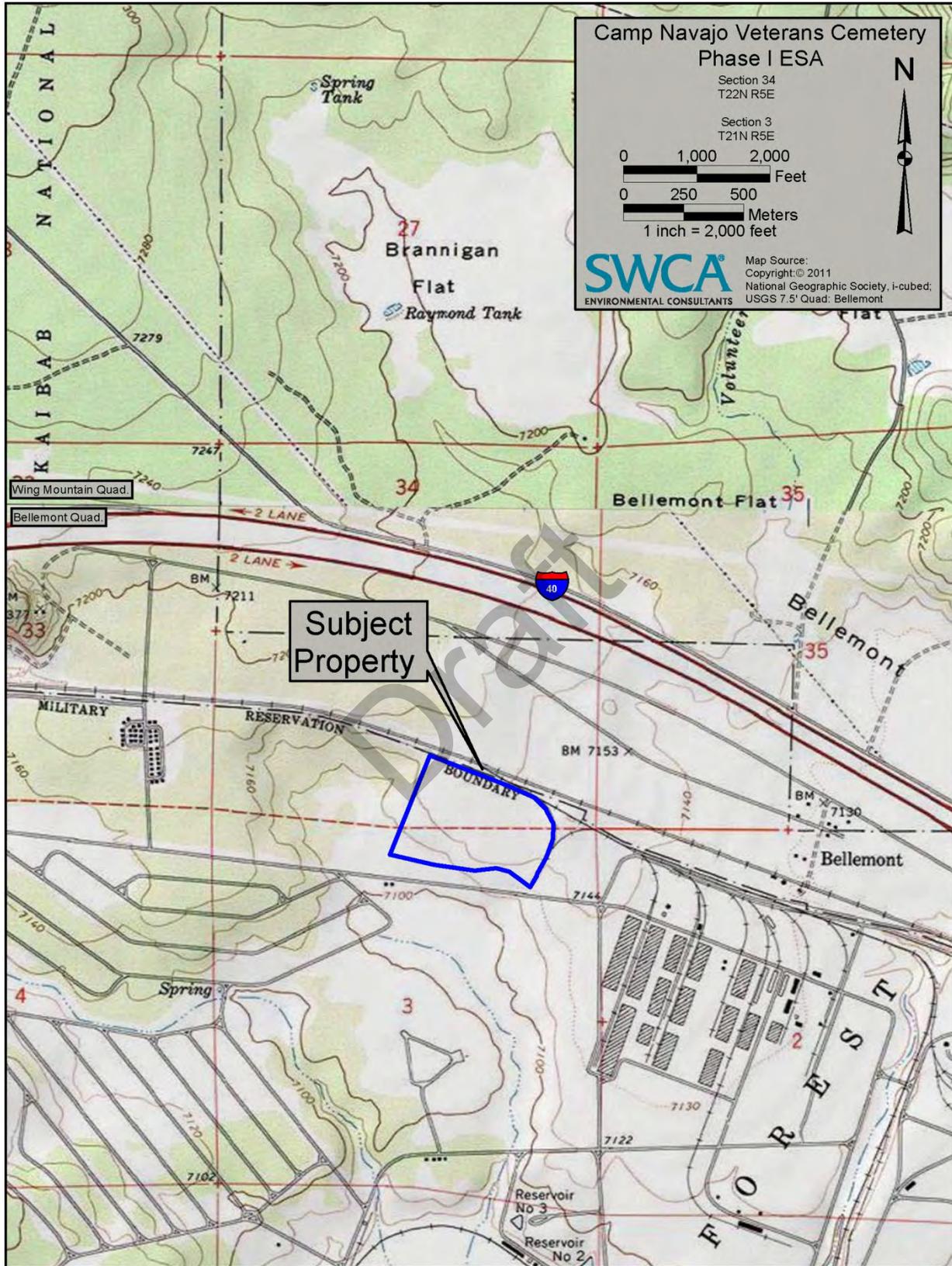


Figure 3

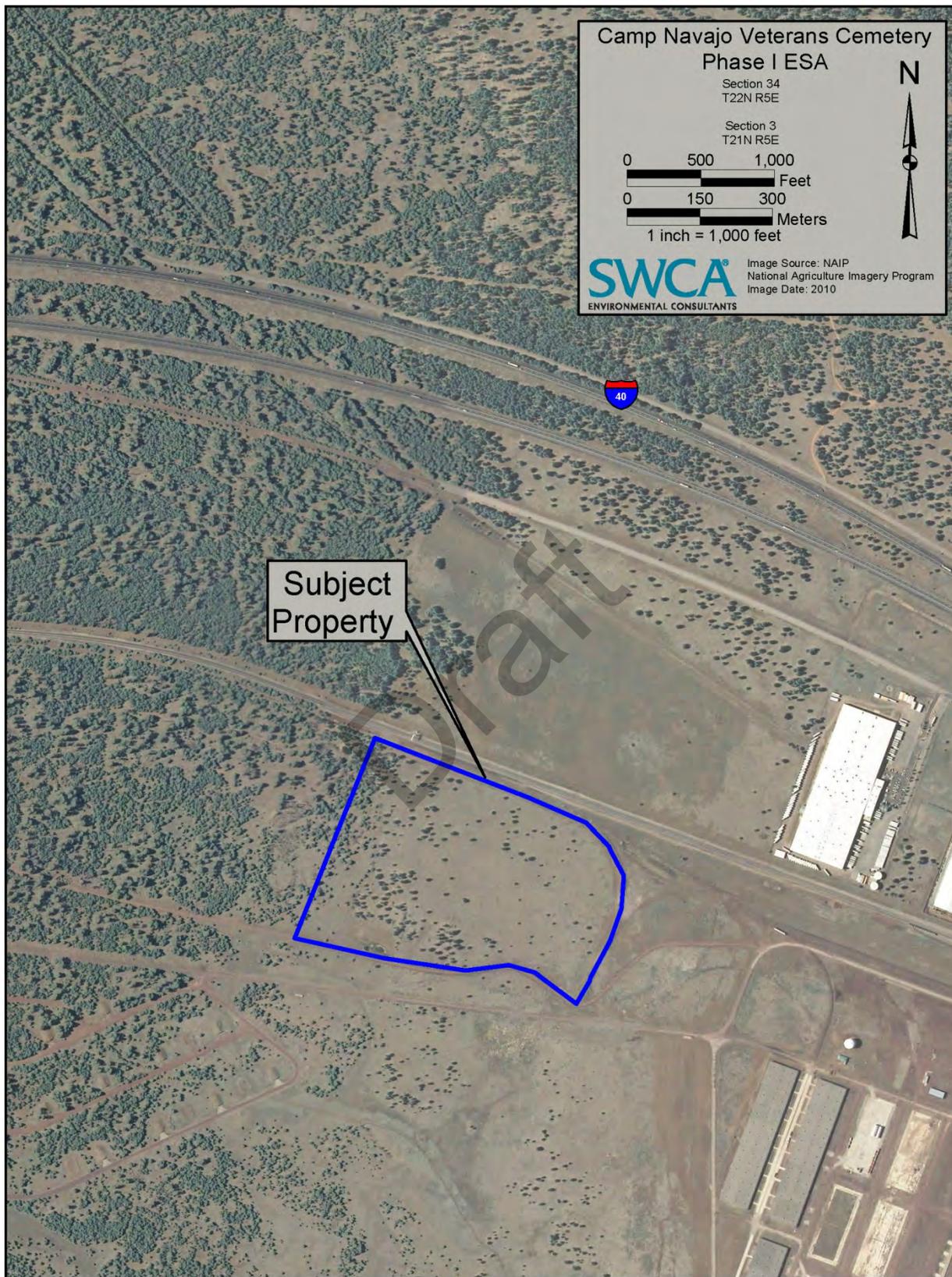
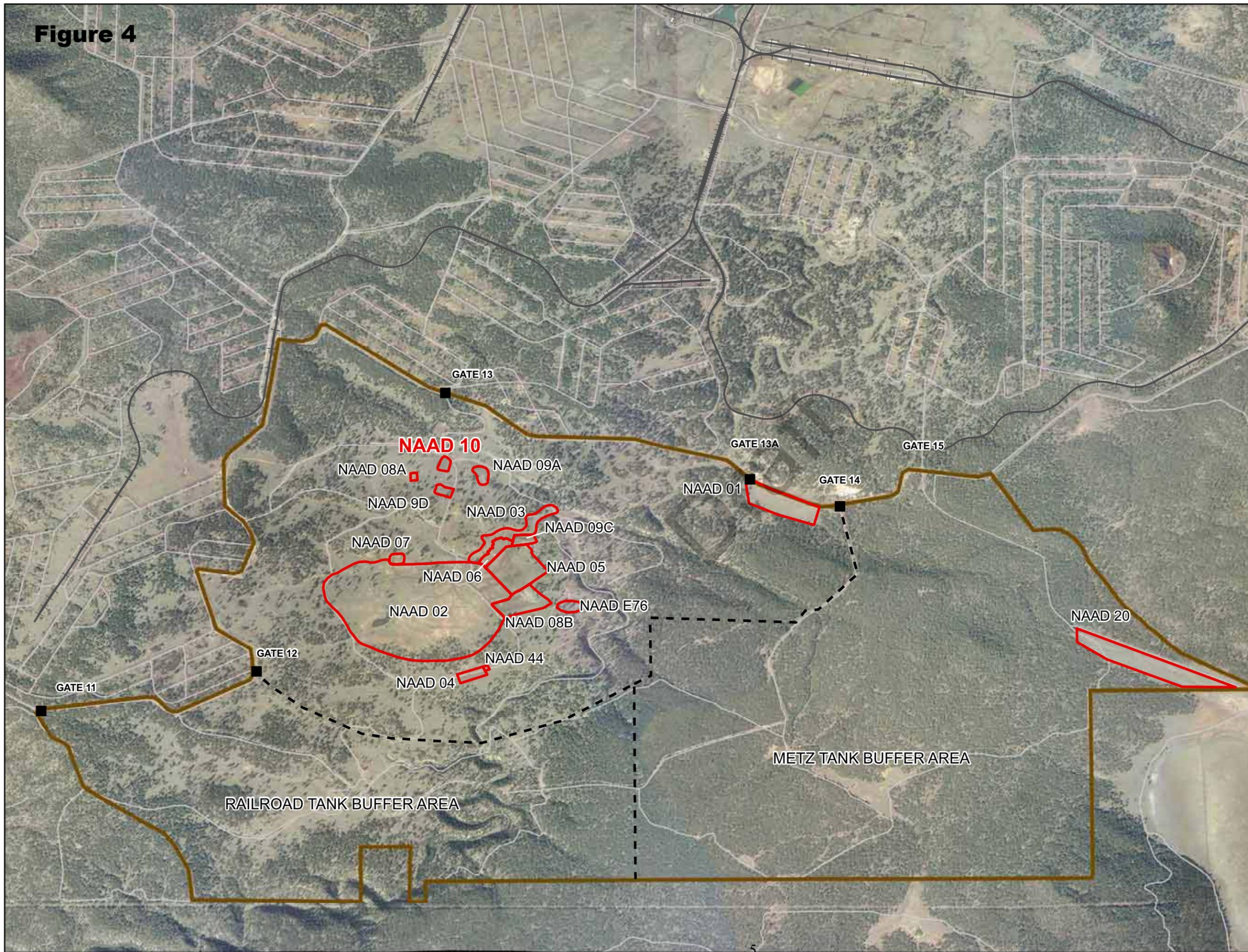


Figure 4



Camp Navajo Bellemont, Arizona

LEGEND

- OB/OD Boundary
- NAAD Areas
- Inner Fence
- Roads
- Railroad

LOCATION MAP

The location map shows a larger area with a green shaded region representing the site's location. A red outline within this region indicates the specific area shown in the main map. The text 'Camp Navajo' is placed within the red outline.

NOTES & SOURCES

Data Sources: Brown & Caldwell, ESRI, USGS, Jones & Stokes

TITLE

OB/OD Area IRP Site Locations, Camp Navajo

0 2,000 Feet

A scale bar showing 0 to 2,000 feet and a north arrow pointing upwards.

Prepared by AMEC for MKM Engineers, Inc.

H:\Camp_Navajo\MKM_Task8\MXD\NAAD010_IRP.mxd
H:\Camp_Navajo\MKM_Task8\Export\NAAD010_IRP.pdf
February 6, 2006 DWN: JBB AP CHKD: BK

4.0 ENVIRONMENTAL CONDITION OF PROPERTY

Environmental Condition of Property (ECP) are categories assigned to FOST Parcels. The classifications are assigned both on the basis of the type of chemical releases (hazardous substances or petroleum) found at the properties and the status of the properties' cleanup activities. See Attachment B for more information on ECPs.

The U.S. Army used parts of the 28,347-acre Camp Navajo for more than 50 years for the demilitarization and land disposal of obsolete or unserviceable conventional ammunition, explosives, and mustard gas (ADVS 2012). The demilitarization operation, consisting of open burn and open detonation, was limited to a 2,500 acre parcel in the southern portion of Camp Navajo, located approximately 3.75 miles south of the subject property (NGB 2006). See Figure 3. In-person interviews did not identify contaminated and cleanup sites on or immediately adjacent to the subject property (ADVS 2012, p. 14). Migration of hazardous chemicals across the subject parcel is possible since it is up-gradient or cross-gradient to those areas. However, studies have found that migration of contaminants at Camp Navajo is limited because pathways via surface water and groundwater do not exist due to the soil composition, high evapotranspiration rates, depth to groundwater, and sporadic precipitation (ADVS 2012). Based on the above, a rating of ECP 3 is assigned to the subject parcel for the potential migration of hazardous substances at concentrations that do not require removal or remedial response. See Attachment B for the

4.1 Environmental Remediation Sites

There are no records or knowledge of environmental investigation or remediation sites on the 60-acre property and no record of ground water contamination on the property (ADVS 2012, p. 14).

4.2 Storage, Release, or Disposal of Hazardous Substances

There is no evidence that hazardous substances were stored, released, or disposed of on the property.

The U.S. Army used parts of Camp Navajo for more than 50 years for the demilitarization and land disposal of obsolete or unserviceable conventional ammunition, explosives, and mustard gas. However, the demilitarization operation, consisting of open burn and open detonation, was limited to a 2,500 acre parcel in the southern portion of Camp Navajo, located approximately 3.75 miles south of the subject property (NGB 2006). Furthermore, in-person interviews did not identify contaminated and cleanup sites on or immediately adjacent to the subject property (ADVS 2012, p. 14).

4.3 Petroleum and Petroleum Products

There is no evidence that petroleum and petroleum products were stored, released, or disposed of on the property. An environmental database records search did not indicate presence of above or underground storage tanks on the property (ADVS 2012, p.5).

4.4 Polychlorinated Biphenyls (PCB)

There is no evidence that PCB-containing equipment is located or was previously located on the property (ADVS 2012, p.6).

4.5 Asbestos

The Phase I ESA for the subject property did not include inspections or sampling for the presence of asbestos containing materials (ADVS 2012, p.1). However, the site is devoid of buildings. Furthermore, there are no known historical uses of the property and the property may not have been developed. Therefore, presence of asbestos is unlikely (ADVS 2012, p. 14).

4.6 Lead-Based Paint (LBP)

The Phase I ESA for the subject property did not include inspections or sampling for the presence of LBPs (ADVS 2012, p.1). However, the site is devoid of buildings. Furthermore, there are no known historical uses of the property and the property may not have been developed. Therefore, presence of materials containing LBPs is unlikely (ADVS 2012, p. 14).

4.7 Radiological Materials

The Phase I ESA for the subject property did not include inspections or sampling for the presence of radiological materials (ADVS 2012, p.1). Furthermore, there are no known historical uses of the property and the property may not have been developed. Therefore, presence of radiological materials is unlikely (ADVS 2012, p. 14).

4.8 Radon

The Phase I ESA for the subject property did not include sampling for the presence of radon materials since the site is devoid of buildings.

4.9 Munitions and Explosives of Concern (MEC)

Munitions and explosives of concern are not known to be located on the subject property (ADVS 2012, p.17).

Camp Navajo encompasses 28,347 acres of land. The U.S. Army used parts of Camp Navajo for more than 50 years for the demilitarization and land disposal of obsolete or unserviceable conventional ammunition, explosives, and mustard gas. However, the demilitarization operation, consisting of open burn and open detonation, was limited to a 2,500 acre parcel in the southern portion of Camp Navajo, located approximately 3.75 miles south of the subject property (NGB 2006). Furthermore, in-person interviews did not identify contaminated and cleanup sites on or immediately adjacent to the subject property.

4.10 Other Property Conditions

There are no known historical uses of or past developments on the property. Therefore, the presence of other hazardous conditions known on the property that present an unacceptable risk to human health and the environment is unlikely.

A small pond exists in the southwestern part of the subject property and appears to be man-made. This pond may be what remains of a previously excavated area.

A small area in the southeast corner of the subject property appeared to have been previously disturbed, and evidence of dumping was present in the form of circular piles of what appeared to be concrete that had been washed from trucks.

5.0 ADJACENT PROPERTY CONDITIONS

There are no conditions immediately adjacent to the property that presents an unacceptable risk to human health and the environment.

Land surrounding the project area includes railroad to the north, followed by undeveloped parcels of private and National Forest land and Interstate 40. Industrial facilities are located approximately 0.25 mile to the northeast. To the west, south, and east is Camp Navajo. More specifically, to the east is a railroad spur, followed by vacant disturbed land, then several large warehouse-type buildings. To the south are vacant land and “igloo” underground storage units. To the west is undeveloped woodland.

The 60-acre parcel is located on the edge of the northern boundary of the 28,347-acre Camp Navajo. The U.S. Army used parts of Camp Navajo for more than 50 years for the demilitarization and land disposal of obsolete or unserviceable conventional ammunition, explosives, and mustard gas. The demilitarization operation consisting of open burn and open detonation was limited to a 2,500 acre parcel in the southern portion of Camp Navajo located approximately 3.75 miles south of the subject property. See Figure 4. In-person interviews did not identify contaminated and cleanup sites on or immediately adjacent to the subject property.

7.0 PUBLIC COMMENTS AND COORDINATION WITH REGULATORY AGENCIES

8.0 NATIONAL ENVIRONMENTAL POLICY ACT COMPLIANCE

The federal action entails the transfer of the subject property from the NGB to the ADVS for the construction of a veterans' cemetery.

A Record of Environmental Consideration (REC) has been prepared for this FOST in compliance with the National Environmental Policy Act.¹ Army Regulation 200-2 authorizes the use of a REC in cases where NEPA documents have been prepared by another agency [AR 200-2, 2-4(b), 3-1(a)]. ADVS prepared an Environmental Assessment (EA) and signed a Finding of No Significant Impact on April 30, 2013 for the construction of a veterans' cemetery on the 60-acre parcel on behalf of U.S. Department of Veterans Affairs which is jointly funding the project. There were no encumbrances or condition identified in the EA deemed necessary to protect human health or the environment.

¹ Army Regulation 200-2 deems appropriate for NEPA compliance, the use of categorical exclusion for transfer of real property within the Army, to another military department, or other Federal agency (AR 200-2, Appendix A, A-24). The proposed action does not qualify for the categorical exclusion since the property is being transferred to the state of Arizona, a non federal entity.

9.0 FINDING OF SUITABILITY FOR TRANSFER

The 60-acre parcel has been assessed and evaluated for the presence of hazardous substances and contamination to ensure that the intended use of this parcel is consistent with the protection of human health and the environment. The findings include the following:

- The demilitarization operation, consisting of open burn and open detonation, was limited to a 2,500 acre parcel in the southern portion of Camp Navajo, located approximately 3.75 miles south of the subject property.
- In-person interviews did not identify contaminated and cleanup sites on or immediately adjacent to the subject property.
- Migration of contaminants at Camp Navajo is limited because pathways via surface water and groundwater do not exist due to the soil composition, high evapotranspiration rates, depth to groundwater, and sporadic precipitation.

A rating of ECP 3 is assigned to the subject parcel for the the potential migration of hazardous substances at concentrations that do not require removal or remedial response.

Based on the above information, I conclude that 60-acre parcel qualify as CERCLA Section 120(h)(4) is uncontaminated property and are transferable under that section.

Approving official's name
Approving official's title
Approving official's organization

Date

10.0 REFERENCES

National Guard Bureau (NGB). July 2006. *Decision Document For Open Burn /Open Detonation Area Installation Restoration Program Site NAAD 10, Camp Navajo, Arizona.* Prepared by MKM Engineers, Inc.

Arizona Department of Veteran's Services (ADVS). May 2012. *Phase I Environmental Site Assessment For The Proposed Camp Navajo Cemetery In Bellemont, Arizona.* Prepared by SWCA Environmental Consultants.

Arizona Department of Veteran's Services (ADVS). April 2013. *Northern Arizona Veterans' Memorial Cemetery Final Environmental Assessment.* Prepared by SWCA Environmental Consultants.

Draft

ATTACHMENT A

EXHIBIT B

Wood, Patel & Associates, Inc.
(602) 335-8500
www.woodpatel.com

January 19, 2012
WP # 113767.80
Page 1 of 4

PARCEL DESCRIPTION Camp Navajo Veterans Cemetery Parcel

A parcel of land lying within Section 34, Township 22 North, Range 5 East, and Section 3, Township 21 North, Range 5 East, of the Gila and Salt River Meridian, Coconino County, Arizona, more particularly described as follows:

Commencing at the south quarter corner of said Section 34, a 2 ½-inch brass cap in rock pile, stamped G.L.O. ¼ S24 S3, from which the southwest corner of said section, a 3 ½-inch aluminum cap in rock pile stamped U.S. Department of Agriculture T22N R5E S33 S34 S4 S3 T21N LS 14671 1998, bears North 84°40'20" West (basis of bearing), a distance of 2690.84 feet;

THENCE along the south line of said section, North 84°40'20" West, a distance of 134.55 feet, to the **POINT OF BEGINNING**;

THENCE leaving said south line, North 15°31'34" East, a distance of 1102.53 feet, to the southerly right-of-way line of Burlington, Northern and Santa Fe Railway;

THENCE along said southerly right-of-way line, South 70°11'53" East, a distance of 1593.07 feet;

THENCE leaving said southerly right-of-way line, South 50°06'47" East, a distance of 226.65 feet, to the beginning of a curve;

THENCE southeasterly along said curve, having a radius of 450.00 feet, concave southwesterly, through a central angle of 46°12'12", a distance of 362.88 feet, to a point of compound curvature;

THENCE southerly along said curve, having a radius of 790.00 feet, concave westerly, through a central angle of 33°52'30", a distance of 467.07 feet, to the curve's end;

THENCE South 29°57'55" West, a distance of 369.51 feet, to the beginning of a curve;

THENCE southerly along said curve, having a radius of 30.00 feet, concave easterly, through a central angle of 60°50'47", a distance of 31.86 feet, to the curve's end;

THENCE South 30°52'52" East, a distance of 45.92 feet;

THENCE South 18°54'24" West, a distance of 11.25 feet;

THENCE North 75°19'27" West, a distance of 66.63 feet;

THENCE North 55°55'04" West, a distance of 316.89 feet, to the beginning of a curve;

THENCE westerly along said curve, having a radius of 350.00 feet, concave southerly, through a central angle of 44°52'24", a distance of 274.12 feet, to the curve's end;

THENCE South 79°12'32" West, a distance of 108.56 feet, to the beginning of a curve;

THENCE westerly along said curve, having a radius of 880.00 feet, concave northerly, through a central angle of 20°28'38", a distance of 314.51 feet, to the curve's end;

THENCE North 80°18'50" West, a distance of 252.94 feet;

THENCE North 77°21'17" West, a distance of 720.52 feet;

Parcel Description
Camp Navajo
Veterans Cemetery Parcel

January 19, 2012
WP # 113767.80
Page 2 of 4
See Exhibit "A"

THENCE North 15°31'34" East, a distance of 374.68 feet, to the **POINT OF BEGINNING**.

Containing 60.0002 acres, or 2,613,608 square feet of land, more or less.

Subject to existing rights-of-way and easements.

This parcel description is based on client provided information. This parcel description is located within an area surveyed by Wood, Patel & Associates, Inc. during the month of December, 2011 and any monumentation noted in this parcel description is within acceptable tolerance (as defined in Arizona Boundary Survey Minimum Standards dated 02/14/2002) of said positions based on said survey.

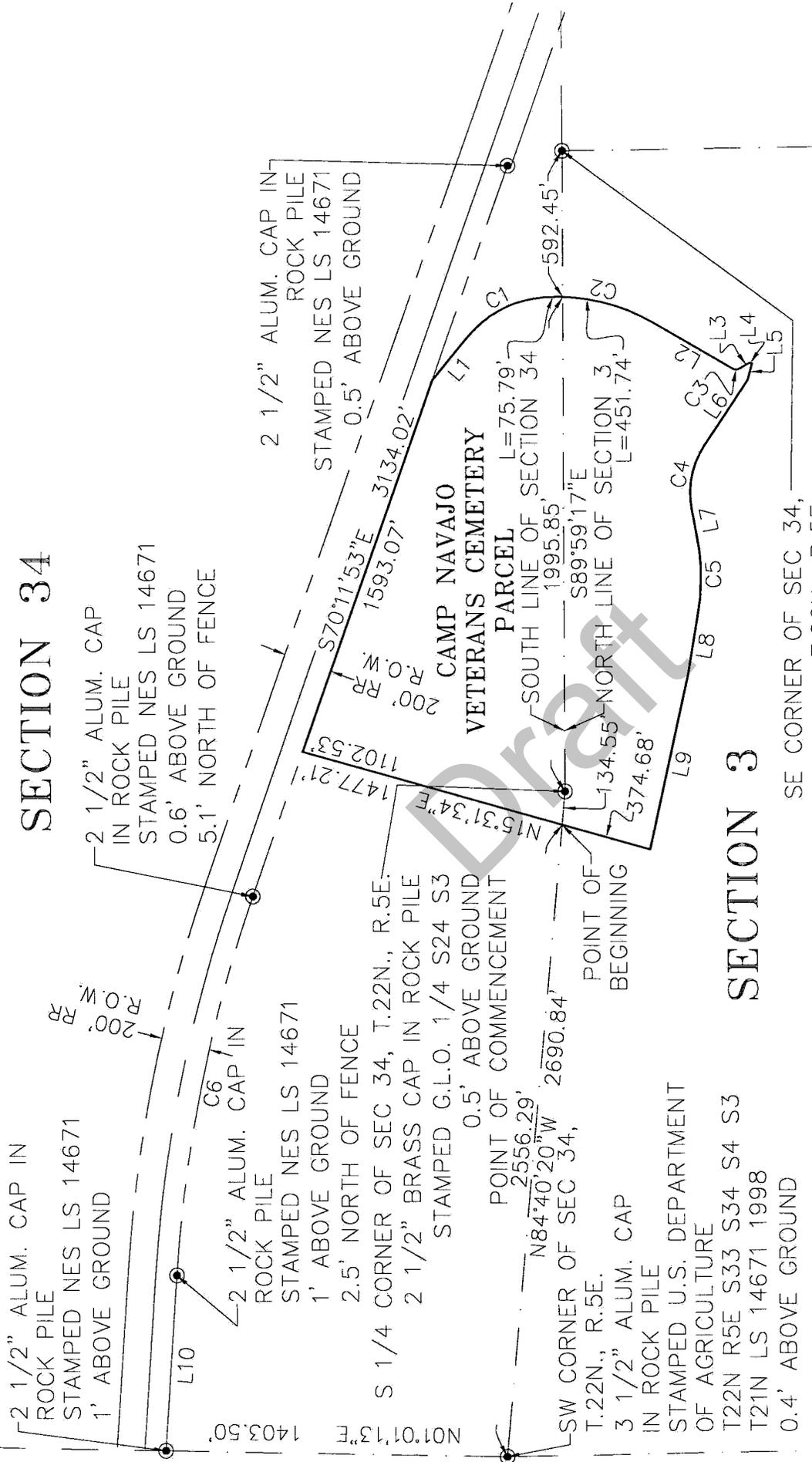
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EXPIRES 03-31-14

Draft

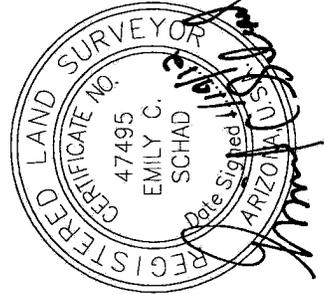
SECTION 34



SECTION 3

CAMP NAVAJO
VETERANS CEMETERY PARCEL

SE CORNER OF SEC 34,
T.22N., R.5E.
2 1/2" ALUM. CAP
IN ROCK PILE
STAMPED G.L.O. 1941 T22N
R5E S34 S35 S3 S2
0.5' ABOVE GROUND



WOOD/PATEL
2051 West Northern
Phoenix, AZ 85021
Phone: (602) 335-8500
Fax: (602) 335-8580
PHOENIX • MESA • TUCSON

ATTACHMENT B

ENVIRONMENTAL CONDITION OF PROPERTY

Environmental Condition of Property (ECP) categories developed under BRAC by the DoD are assigned to FOST Parcels. The classifications are assigned both on the basis of the type of chemical releases (hazardous substances or petroleum) found at the properties and the status of the properties' cleanup activities. These ECP categories include the following ECP (DoD 1996a):

- ECP 1 Areas where no release or disposal of hazardous substances or petroleum products has occurred (including migration from adjacent areas).
- ECP 2 Areas where only the release or disposal of petroleum products has occurred.
- ECP 3 Areas where release, disposal, or migration of hazardous substances has occurred, but at concentrations that do not require removal or remedial response.
- ECP 4 Areas where release, disposal, or migration of hazardous substances has occurred, and all removal or remedial actions to protect human health and the environment have been taken.
- ECP 5 Areas where release, disposal, or migration of hazardous substances has occurred, and removal or remedial actions are underway, but all required remedial actions have not yet been taken.
- ECP 6 Areas where release, disposal, or migration of hazardous substances has occurred, but required remedial actions have not yet been implemented.
- ECP 7 Areas that are not yet evaluated or require additional evaluation.

Individual sites with ECP Classifications of 1, 2, 3, or 4 are designated as being currently suitable for transfer or lease.

Those with ECP Classifications of 5, 6, or 7 are not currently suitable for transfer, but may be suitable for lease.

REFERENCE:

Department of Defense (1996). Clarification of “Uncontaminated” Environmental Condition of Property at Base Realignment and Closure Installations.