

Finding of Suitability to Transfer and Record of Environmental Consideration

60-Acre Veterans Cemetery Camp Navajo Bellemont, Arizona

Prepared for:

National Guard Bureau

Prepared by:

**U.S. Army Corps of Engineers
Los Angeles District
Regional Planning Section**

April 2013

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ENCLOSURES:

Attachment A: Legal description of the subject parcel

Attachment B: Environmental Condition of Property Classifications

Attachment C: Public notice and mailing list

Attachment D: Letter of concurrence from the Arizona Department of Environmental Quality

Attachment E: Record of Environmental Consideration

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

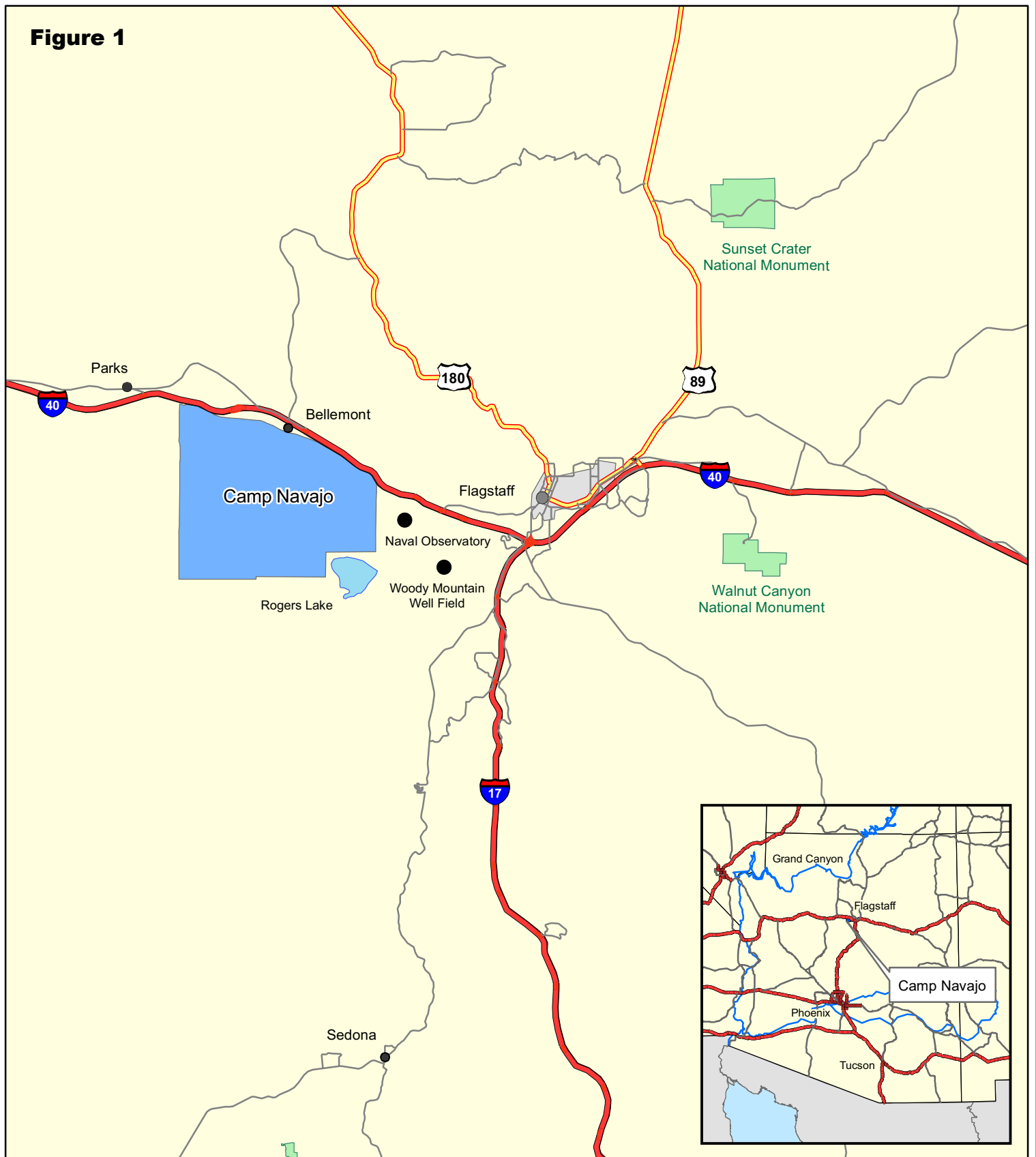
Camp Navajo is located in Bellemont, Coconino County, Arizona and encompasses 28,347 acres of land. The subject property totals approximately 60 acres (approximate center point coordinates: 35.2381, -111.8492) and is located on the northern boundary of Camp Navajo. See Figures 1, 2, and 3. The subject 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 Property (ECP) was 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



0 5
Miles

Sources:
Brown & Caldwell, ESRI



Location Map, Camp Navajo, Belmont, Arizona



Figure 2-1

Figure 2

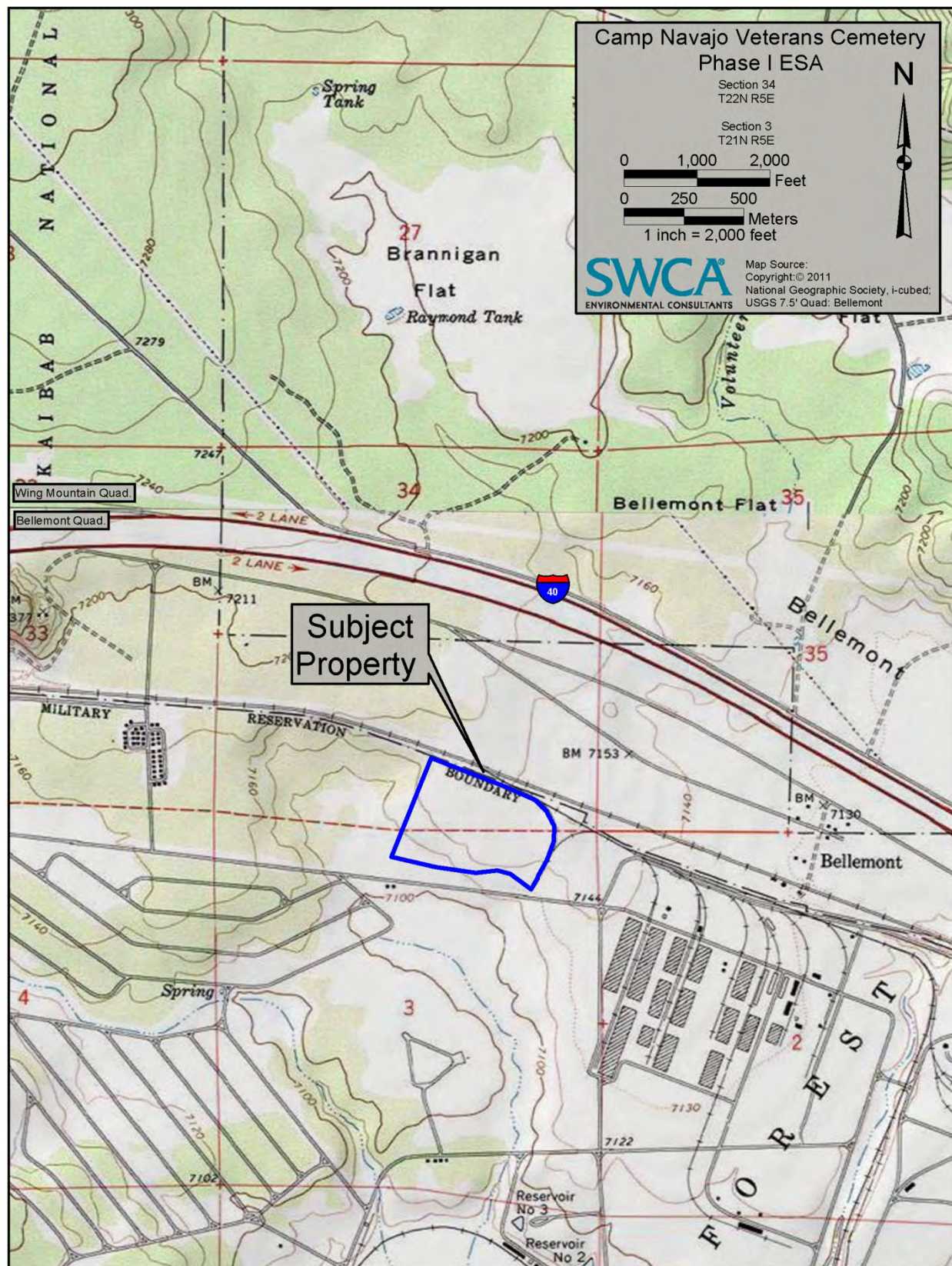


Figure 1. General location of the subject property.

Figure 3

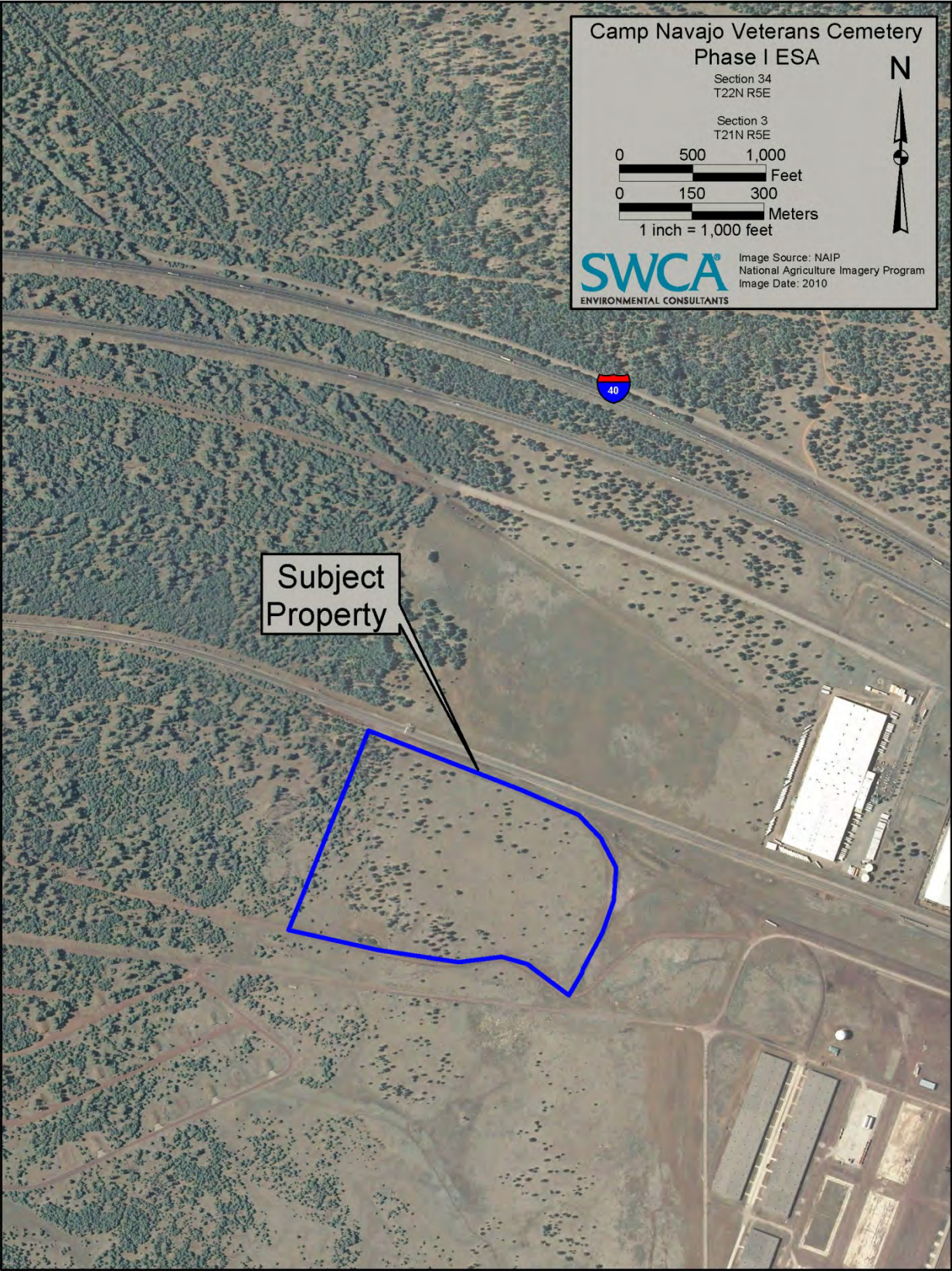
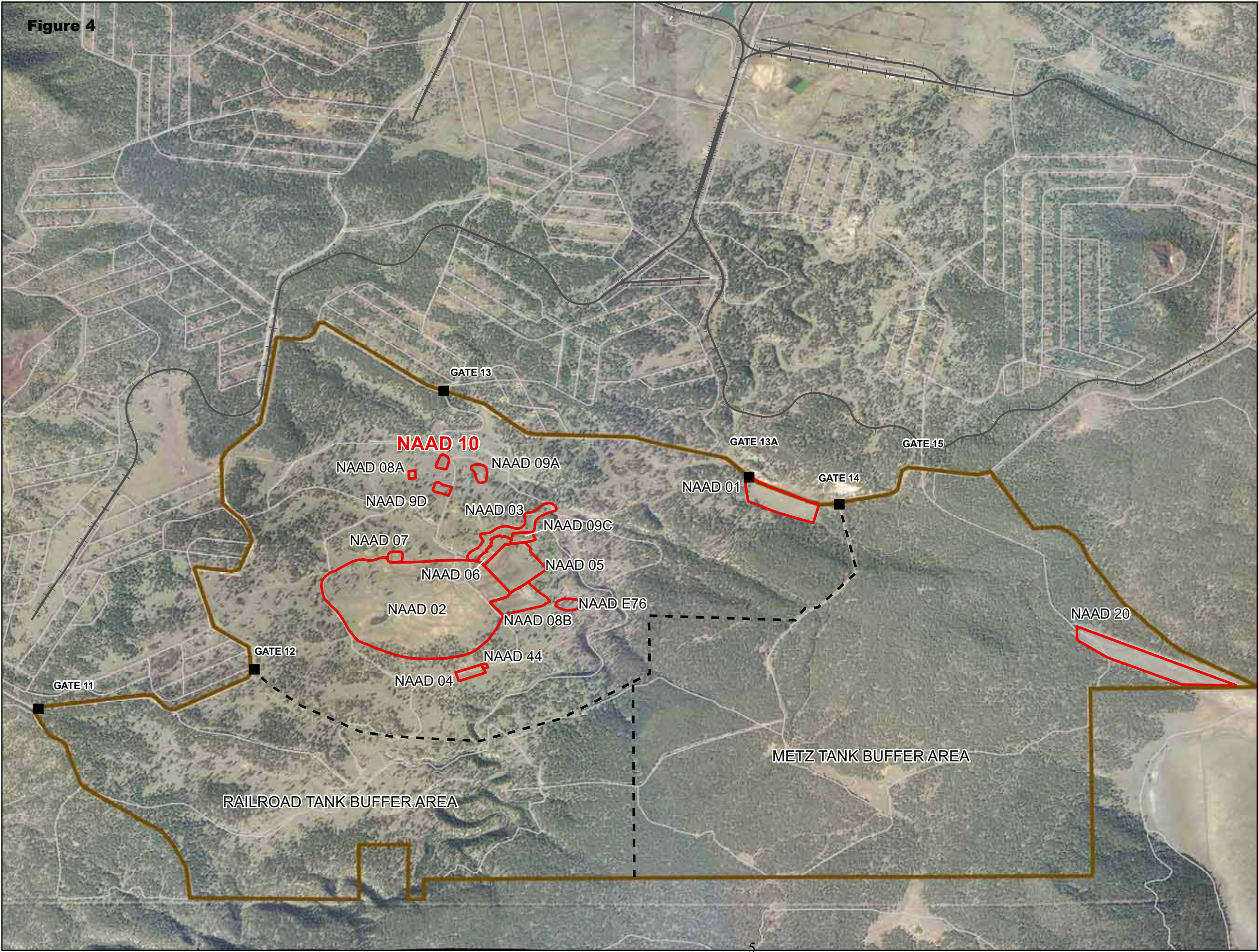


Figure 2. Subject property and surrounding properties shown on an aerial photograph.

Figure 4



Camp Navajo
Bellemont, Arizona

LEGEND

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

LOCATION MAP



NOTES & SOURCES

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

TITLE

OB/OD Area IRP Site
Locations, Camp Navajo

0 2,000
Feet



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

FIGURE

2-2

4.0 ENVIRONMENTAL CONDITION OF PROPERTY

ECPs are classifications 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. Furthermore, the subject property likely serves as a buffer area, separating active operations from adjacent land uses, since it is on the boundary of Camp Navajo. In addition, 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, it is likely that the subject parcel is uncontaminated, and a rating of ECP 1 is assigned to the parcel.

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 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.

6.0 PUBLIC COMMENTS AND COORDINATION WITH REGULATORY AGENCIES

This document was made available for a 30-day review period from September 16, 2013 through October 16, 2013. Owners of adjacent properties; federal, state, and county regulatory agencies; and tribal point of contacts were notified through printed copies of the public notice (Attachment C). The document was also made available on the World Wide Web at:

http://www.spl.usace.army.mil/Portals/17/docs/publicnotices/camp_navajo_%20draft_fost.pdf

A printed copy was also posted at the Coconino County Public Library, 300 W Aspen Ave., Flagstaff, AZ 86001.

A letter dated April 3, 2014 from the Arizona Department of Environmental Quality concurred with the ECP 1 rating (see Attachment D). No other comments from regulatory agencies, tribal representatives, and the public were received.

7.0 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 (see Attachment E).¹ Army regulations

¹ Army regulations at 32 CFR Part 651.19 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. 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. Thus, a Record of Environmental Consideration was prepared.

at 32 CFR Part 651.19 authorize the use of a REC in cases where NEPA documents have been prepared by another agency. 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. There were no encumbrances or conditions identified in the EA deemed necessary to protect human health (ADVS 2013, p. 34).

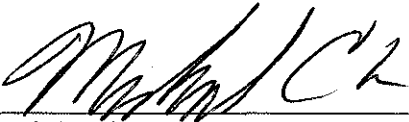
8.0 FINDING OF SUITABILITY FOR TRANSFER

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.
- The subject property likely serves as a buffer area, separating active operations from adjacent land uses, since it is on the boundary of Camp Navajo.
- 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.

Therefore, the subject parcel is likely uncontaminated and is assigned an ECP 1 rating. The Arizona Department of Environmental Quality has reviewed this FOST and concurred with the rating.

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.



Michael C. Ahn
Colonel, US Army
Chief, Environmental
Programs Division



Date

9.0 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.

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.

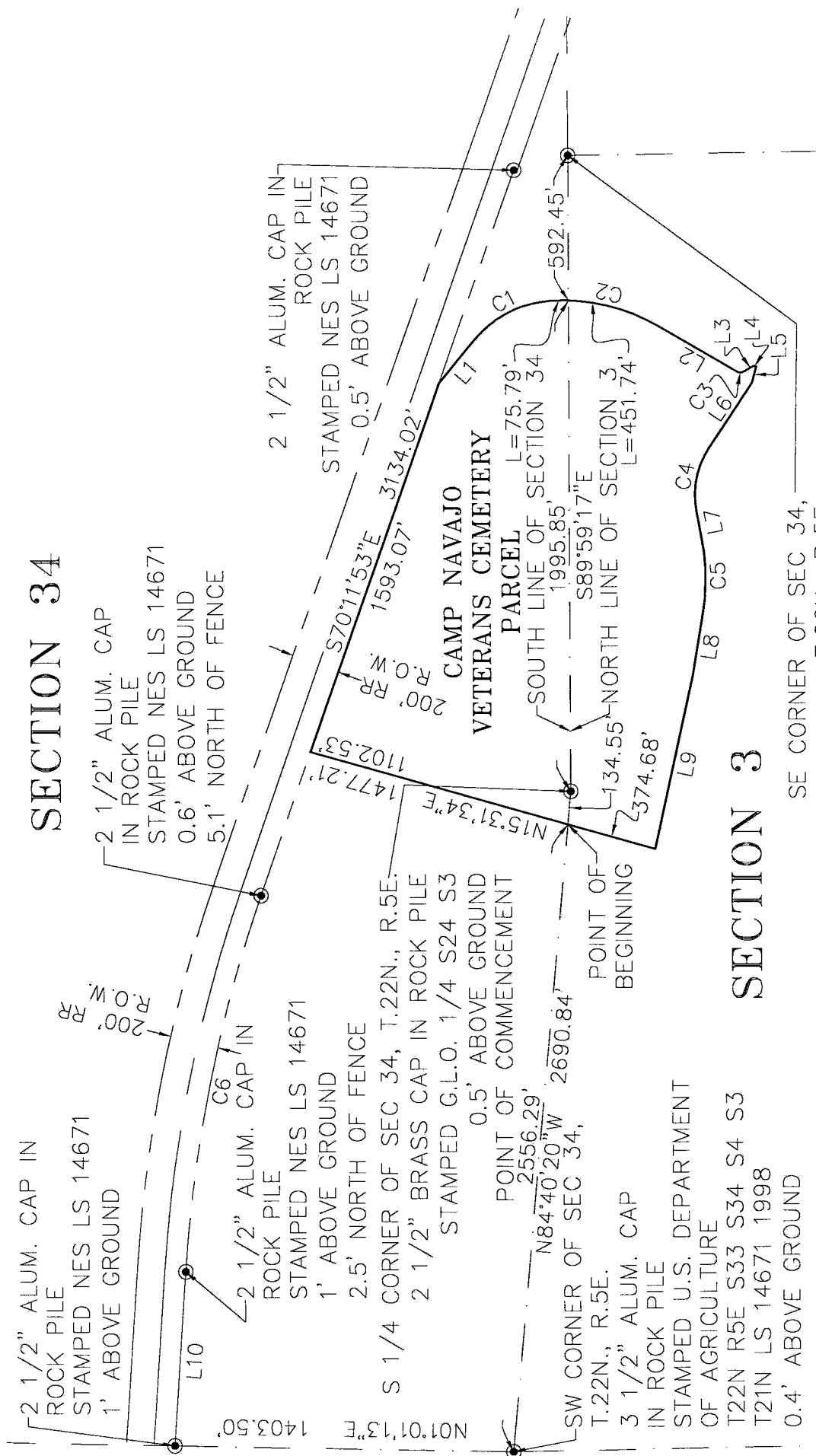
This parcel description is based on client provided information. This parcel description is located within an area surveyed by Wood, Patel & Associates, Inc. during the month of December, 2011 and any monumentation noted in this parcel description is within acceptable tolerance (as defined in Arizona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

Y:\WP\Parcel Descriptions\2011 Parcel Descriptions\113767.80 Camp Navajo Veterans Cemetery Parcel L01 01-19-12.doc



EXPIRES 03-31-14

SECTION 34



SECTION 3



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

EXPIRES 03-31-14

CAMP NAVAJO
 VETERANS CEMETERY PARCEL
 01-19-2012
 WP# 113767.80
 PAGE 3 OF 4
 NOT TO SCALE

T: \2011\113767\Legal\3767L01-DB\Dwg\3767L01

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.

Attachment C



REPLY TO
ATTENTION OF

Office of the Chief
Planning Division

DEPARTMENT OF THE ARMY

LOS ANGELES DISTRICT CORPS OF ENGINEERS
P.O. BOX 532711
LOS ANGELES, CALIFORNIA 90053-2325

September 9, 2013

Ms. Holland Christie
Public Services Manager
Coconino County Public Library
300 West Aspen Avenue
Flagstaff, Arizona 86001

Dear Ms. Christie

I am requesting posting of the enclosed public notice package for public review at the Coconino County Public Library for a 30-day review period from September 16, 2013 through October 16, 2013.

If you have any questions, please contact me at (213) 452-3867.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth Wong", is written over the typed name.

Kenneth Wong
Chief, Regional Planning Section
Environmental Resources Branch

Enclosure



PUBLIC NOTICE

**U.S. ARMY CORPS OF ENGINEERS
LOS ANGELES DISTRICT**

BUILDING STRONG®

DRAFT FINDING OF SUITABILITY TO TRANSFER PROPOSED 60 ACRE VETERANS' CEMETARY AT CAMP NAVAJO, ARIZONA

The U.S. Army Corps of Engineers, Los Angeles District (Corps) on behalf of the National Guard Bureau (NGB) has completed a draft Finding of Suitability to Transfer (FOST) for a 60-acre parcel at Camp Navajo near Bellemont, Arizona. See map on backpage.

The NGB proposes to transfer the 60-acre parcel to the Arizona Department of Veterans Services for the construction of a veterans' cemetery. The FOST was prepared pursuant to Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act.

The document is available for is available for a 30-day review period from September 16, 2013 through October 16, 2013. The document is accessible via the World-Wide Web at:

http://www.spl.usace.army.mil/Portals/17/docs/publicnotices/camp_navajo_%20draft_fost.pdf

Alternatively, a printed copy is available for viewing at:

Coconino County Public Library
300 W Aspen Ave.
Flagstaff, AZ 86001

The Corps is soliciting comments from the public; Federal, state, and local agencies and officials; and other interested parties on the draft FOST. Comments will be accepted from September 11, 2013 to October 11, 2013.

Mail comments to:

U.S. Army Corps of Engineers
Kenneth Wong, CESPL-PD-RL
P.O. Box 532711
Los Angeles, CA 90053-2325

Alternatively, comments can be sent electronically to: kenneth.wong@usace.army.mil

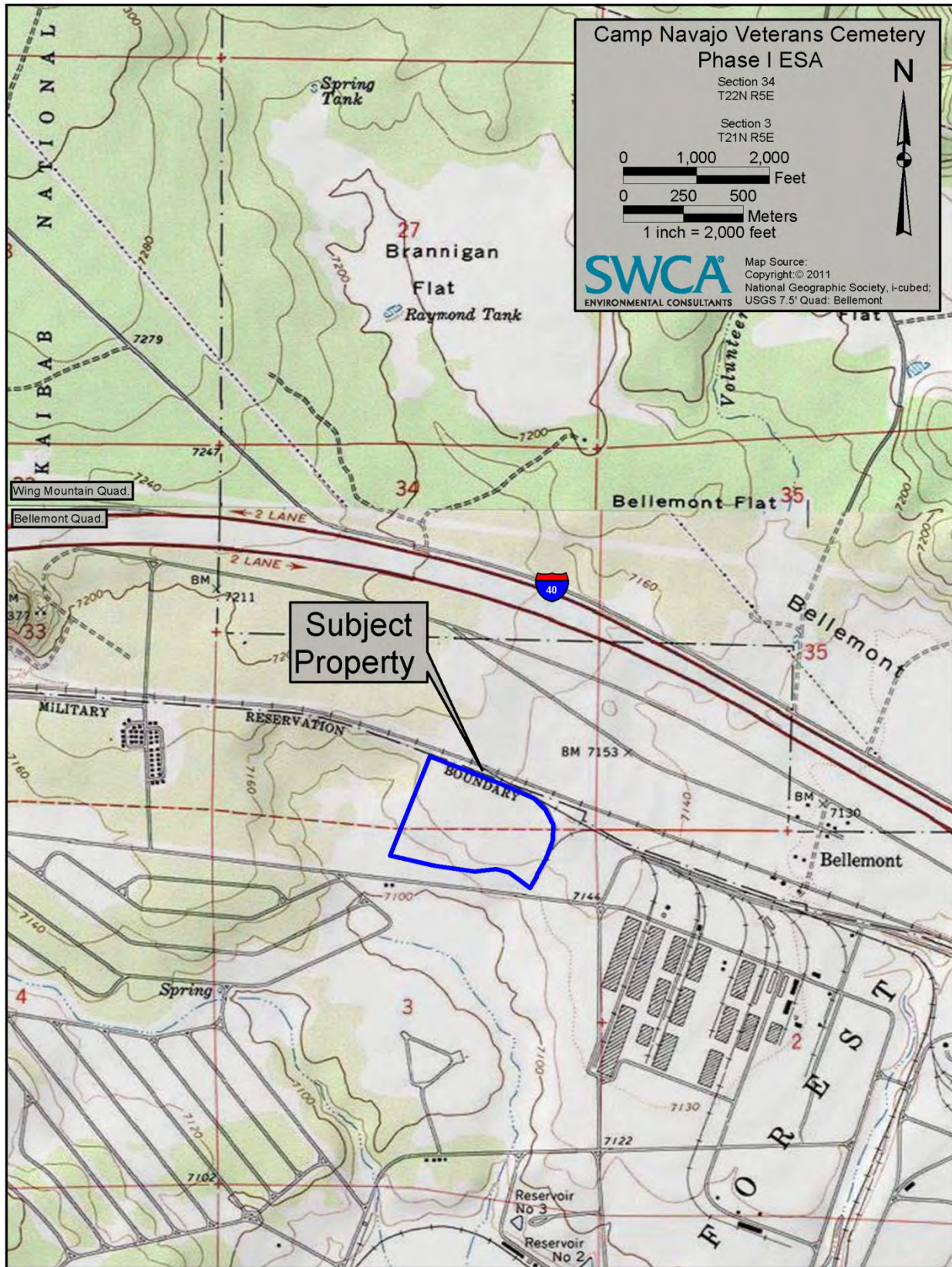
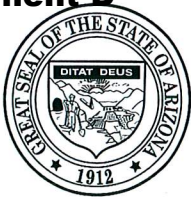


Figure 1. General location of the subject property.

Adjacent Property Owners

| PARCEL NUMBER | OWNER NAME | OWNER ADDRESS |
|---------------|--|--|
| 20335010C | BELLEMONT DEVELOPMENT CO | 8468 S MAPLE AVE TEMPE, AZ 85284 |
| 20340002V | SCA TISSUE NORTH AMERICA | PO BOX 2400 NEENAH, WI 54957 |
| 20340002K | HARRIS LIVING TRUST U/A DTD 4-13-94 ; GREGG ROGE | 4829 FLYING CLOUD WAY CARLSBAD, CA 92008 |
| 20340002G | SCHUFF STEEL COMPANY | 1841 W BUCHANAN ST PHOENIX, AZ 85007 |
| 20335011 | BNSF RAILWAY COMPANY | P O BOX 961089 FORT WORTH, TX 76161-0089 |
| N/A | Coconino National Forest | Supervisor's Office 1824 S. Thompson St. Flagstaff, AZ 86001 |
| N/A | Director of Industrial Operations, LTC Peter R. Tosi | Camp Navajo Industrial Operations P.O. Box 16123 Bellemont, AZ |
| N/A | Garrison Commander, Lieutenant Colonel (LTC) Dale E. | Camp Navajo Army National Guard Base P.O. Box 16123 |

| FirstName | LastName | Agency | JobTitle | Address | City | State | ZipCode |
|------------------|-----------------|--|-------------------------|--|---------------|-------|---------|
| Federal Agencies | | | | | | | |
| Sallie | McGuire | US Army Corps of Engineers | Regulatory Branch Chief | 3636 N. Central Ave., Suite 900 | Phoenix | AZ | 85012 |
| Willard | Chin | US Environmental Protection Agency | Tribal Administrator | 75 Hawthorne Street, CMO-3 | San Francisco | CA | 94105 |
| Steve | Spangle | US Fish and Wildlife Service | Field Supervisor | 2321 W. Royal Palm Rd. Ste.103 | Phoenix | AZ | 85021 |
| Ken | Davis | US Federal Highway Administration - Arizona Division | District Engineer | 4000 North Central Avenue, Suite 1500 | Phoenix | AZ | 85012 |
| State Agencies | | | | | | | |
| | | | | | | | |
| Rob | Scalamera | Arizona Department of Environmental Quality | | | Phoenix | AZ | 85007 |
| Janice | Brewer | Brewer | Governor | Executive Tower 1700 W. Washington St. | Phoenix | AZ | 85007 |
| Tom | Carr | Arizona Department of Water Resources | Assistant Director | 3550 N. Central Avenue | Phoenix | AZ | 85012 |
| Ray | Schweinsburg | Arizona Game and Fish | Research Supervisor | 2221 W. Greenway Parkway | Phoenix | AZ | 85023 |
| | Supervisor | Division | Flagstaff - District 2 | 1100 West Kaibab Lane | Flagstaff | AZ | 86001 |
| Valerie | Spicer | Arizona Indian Gaming Association | Acting Director | 2214 N. Central Avenue | Phoenix | AZ | 85004 |
| Adjutant General | Hugo E. Salazar | (State National Guard) | Major General | 5636 E McDowell Rd | Phoenix | AZ | 85008 |
| Joey | Strickland | Arizona Department of Veterans' Services | Director | 3839 North Third Street, Suite 209 | Phoenix | AZ | 85012 |
| Commissioner | Judy Lowe | AZ Department of Real Estate (oversees cemeteries) | Commissioner | 2910 N. 44th Street | Phoenix | AZ | 85018 |
| James | Garrison | State Historic Preservation Office | SHP Officer | 1300 W Washington Street | Phoenix | AZ | 85007 |
| County Agencies | | | | | | | |
| Art | Babbott | Coconino County Board of Supervisors | Supervisor District 1 | 219 East Cherry | Flagstaff | AZ | 86001 |
| Elizabeth | Archuleta | Coconino County Board of Supervisors | Supervisor Chair | 219 East Cherry | Flagstaff | AZ | 86001 |
| Matt | Ryan | Coconino County Board of Supervisors | Supervisor District 3 | 219 East Cherry | Flagstaff | AZ | 86001 |
| Mike | Townsend | Coconino County Manager | Manager | 219 East Cherry | Flagstaff | AZ | 86001 |
| Randy | Ryan | Coconino County Department of Public Works | County Engineer | 5600 East Commerce | Flagstaff | AZ | 86004 |
| Mark | Buzzard | Coconino County Planning and Zoning | Commission - District 3 | 1460 W. Cox Avenue | Flagstaff | AZ | 86001 |
| Sue | Pratt | Coconino County Flood Control | Director | 2500 N Fort Valley Rd | Flagstaff | AZ | 86001 |
| Tribes | | | | | | | |
| David | Kwail | Yavapai Apache Nation | Chairman | 2400 W. Datsi St. | Camp Verde | AZ | 86322 |
| Ben | Shelly | Navajo Nation | President | PO Box 663 | Window Rock | AZ | 86515 |
| Don | Watahomigie | Havasupai Indian Reservation | Chairman | PO Box 10 | Supai | AZ | 86435 |
| LeRoy | Shingoitewa | Hopi Tribe | Chairman | PO Box 123 | Kykotsmovi | AZ | 86039 |
| Louise | Benson | Hualapai Tribe | Chairwoman | PO Box 179 | Peach Springs | AZ | 86434 |
| Manual | Savala | Kaibab-Paiute Tribe | Chairman | HC 65 Box 2 | Fredonia | AZ | 86022 |
| Ernest | Jones | Yavapai-Prescott Indian Tribe | President | 530 E. Merritt | Prescott | AZ | 86301 |



Janice K. Brewer
Governor

ARIZONA DEPARTMENT
OF
ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin
Director

April 3, 2014
FPU14-182

Mr. Kenneth Wong
Department of the Army
Los Angeles District Corps of Engineers
PO Box 532711
Los Angeles, CA 90053-2325

Re: Camp Navajo, FOST – 60-Acre Parcel, Environmental Condition of Property Rating, Proposed Veterans' Cemetery, Camp Navajo, Bellemont, Arizona

Dear Mr. Wong:

Arizona Department of Environmental Quality's (ADEQ), Federal Projects Unit (FPU) concurs with the Environmental Condition of Property (ECP) rating presented in the Finding of Suitability to Transfer (FOST) document.

Thank you for allowing this comment opportunity. Should you have any questions regarding this correspondence, please contact me by phone at (602) 771-4121 or e-mail: miller.wayne@azdeq.gov.

Sincerely,

Wayne Miller
ADEQ Project Manager
Federal Projects Unit, Remedial Projects Section
Waste Programs Division

cc: Mr. Kenneth Wong, USACE - hardcopy and e-copy - Kenneth.Wong@usace.army.mil
Mr. Joseph Merrion, USACE – hardcopy and e-copy – joseph.e.merrion@usace.army.mil
Diana Deming, ADEQ – deming.diana@azdeq.gov
ADEQ Reading and Project File

**RECORD OF ENVIRONMENTAL CONSIDERATION
FINDING OF SUITABILITY OF TRANSFER
FOR
60-ACRE PARCEL AT CAMP NAVAJO, BELLEMONT, ARIZONA**

Project Title:

Finding of Suitability for Transfer (FOST) for Northern Arizona Veteran's Memorial Cemetery

Project Description:

The National Guard Bureau (NGB) proposes a deed transfer of a 60-acre parcel at Camp Navajo, shown on Figures 1 and 2, to the Arizona Department of Veterans Services (ADVS) for the construction of a veteran memorial cemetery. Construction of the cemetery is jointly funded by the ADVS and the US Department of Veteran Affairs. *The NGB's action is strictly limited to the transfer of real property to the ADVS.*

Anticipated date and/or duration of the proposed action:

The NGB proposes to execute the deed transfer in May 2014.

Rationale for using Record of Environmental Consideration:

Army regulations authorize the use of a Record of Environmental Consideration (REC) in cases where environmental documents have been prepared by another agency (32 CFR 651.19). 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 the US Department of Veteran Affairs.

Summary of environmental impacts:

The EA concluded that environmental impacts associated with the construction of the cemetery would result in less than significant impacts. Summary of selected environmental resources deemed to be most applicable to the construction of a cemetery on the 60-acre parcel follows:

- **Biological Resources:** None of the 22 threatened or endangered species listed for Coconino County by the U.S. Fish and Wildlife Service are likely to occur in the project area. The project area is beyond the known geographic or elevational range of these species, or it does not contain vegetation or landscape features known to support these species, or both. The project area is not located within or near any federally proposed or designated critical habitat, and there are no occurrence records for any Endangered Species Act-listed species within 3 miles of the project area. Therefore, construction

activities would not affect species protected under the Endangered Species Act. Furthermore, the project would implement practices to ensure compliance with the Migratory Bird Treaty Act. See ADVS 2013, p. 22.

- **Cultural Resources:** The majority of the Camp Navajo facility, including the project area, was surveyed for cultural resources in 1995, 1996, and 1999; in 2005 and 2006. The U.S. Department of Veteran Affairs consulted with the State Historic Preservation Office (SHPO). The SHPO concurred with a determination of "no historic properties affected" for the construction of the cemetery on the 60-acre parcel on May 11, 2012. See ADVS 2013, p. 17.
- **Air Quality:** Minor, short-term effects to air quality would occur as a result of construction activities associated with the development. These emissions would be controlled using standard construction best management practices. Additional traffic control measures (signage for construction vehicles, reduced speeds) may be implemented during construction. Furthermore, Coconino County is designated attainment for the National Ambient Air Quality Standards. Therefore, short-term construction related and de minimis operational emissions would not violate National Ambient Air Quality Standards. See ADVS 2013, p. 16.
- **Hazardous Materials:** 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, none of those areas are known to be located on the project area, and the project area is upgradient or cross-gradient to those areas. Furthermore, studies have found that movement of contaminants through the soil 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 Phase I Environmental Site Assessment (ESA) of the project area conducted in 2012 concluded that there was no evidence of the presence or likely presence of hazardous materials or petroleum products under conditions that indicated an existing release, a past release, or material threat of a release of any hazardous substances or petroleum products into structures on the property, or into the ground, groundwater, or surface water of the project area. See ADVS 2013, p. 26; and ADVS 2012.

Based on the Phase I ESA, an ECP 1 rating was assigned to the property in the FOST. The Arizona Department of Environmental Quality has concurred with the assigned rating.

- **Water Quality:** The proposed project is located on arid landscape devoid of perennial waters and wetlands. There are no jurisdictional waters of the U.S. within the project area. The proposed project would not result in the discharge of fill into waters of the U.S. Additionally, a Storm Water Pollution Prevention Plan will be developed to minimize sediment and other pollutant runoff during construction. See ADVS 2013, p. 20.

Summary of compliance with applicable environmental laws

Per 32 CFR 651.19, projects qualifying for the use of a REC must comply with other environmental laws and regulations. Section 1.4 of the ADVS EA documents compliance with other environmental laws and regulations. Compliance with major federal environmental laws and regulations are summarized below.

- **National Environmental Policy Act of 1969. Public Law (PL) 91-190, 42 United States Code 4321-4370(e), as amended.** NEPA requires federal agencies to take into consideration the environmental consequences of proposed actions as well as input from state and local governments, Indian tribes, the public, and other federal agencies during their decision-making process. *This REC, prepared pursuant to 32 CFR 651.19, complies with NEPA.*
- **Clean Water Act of 1977, as amended.** Section 404 of this act identifies conditions under which a permit is required for construction projects that result in the discharge of dredged or fill material into waters of the U.S. *The proposed project is located on arid landscape devoid of perennial waters and wetlands. There are no jurisdictional waters of the U.S. within the project area. The proposed project would not result in the discharge of fill into waters of the U.S.*
- **Safe Drinking Water Act of 1974, as amended.** Section 1424 of this act regulates underground injection into an aquifer, which is the sole or principal drinking water source for an area. *One well will be installed for the proposed facilities, but no dry wells, injection wells, or other features that interact with the local aquifer will be constructed.*
- **Executive Order (EO) 11988, Floodplain Management, May 24, 1977.** EO 11988 requires avoiding or minimizing harm associated with the occupancy or modification of a floodplain. *The project area is not located within any designated floodplain; therefore, no modification would take place.*
- **EO 11990, Protection of Wetlands, May 24, 1977.** EO 11990 requires federal agencies or federally funded projects to restrict uses of federal lands for the protection of wetlands through avoidance or minimization of adverse impacts. The order was issued to “avoid to

the extent possible the long- and short-term adverse impacts associated with the destruction or modification of wetlands and to avoid direct or indirect support of new construction in wetlands whenever there is a practicable alternative.” *The proposed project is located on arid landscape devoid of perennial waters and wetlands.*

- **Wild and Scenic Rivers Act of 1968.** This act requires consideration of wild and scenic rivers in planning water resources projects. Developing water resources projects is prohibited on any river designated for study as a potential component of the national wild and scenic river system. *The proposed project is located on arid landscape devoid of perennial waters and wetlands. There are no rivers in the area that would be affected by this project.*
- **Fish and Wildlife Coordination Act of 1934, as amended.** This act requires coordination with federal and state wildlife agencies (U.S. Fish and Wildlife Service and Arizona Game and Fish Department) for the purpose of mitigating losses of wildlife resources caused by a project that impounds, diverts, or otherwise modifies a stream or other natural body of water. *The proposed project is located on arid landscape devoid of perennial waters and wetlands. The proposed project would not impound, divert or modify water bodies.*
- **Endangered Species Act of 1973, as amended.** Section 7 of this act requires federal agencies to consult with the USFWS to ensure that undertaking, funding, permitting, or authorizing an action is not likely to jeopardize the continued existence of listed species or destroy or adversely modify designated critical habitat. *None of the 22 threatened or endangered species listed for Coconino County by the U.S. Fish and Wildlife Service are likely to occur in the project area. The project area is beyond the known geographic or elevational range of these species, or it does not contain vegetation or landscape features known to support these species, or both. The project area is not located within or near any federally proposed or designated critical habitat, and there are no occurrence records for any Endangered Species Act-listed species within 3 miles of the project area.*
- **The Bald and Golden Eagle Protection Act of 1940, as amended.** This act prohibits anyone, without a permit issued by the Secretary of the Interior, from "taking" bald eagles, including their parts, nests, or eggs. The act provides criminal penalties for persons who "take, possess, sell, purchase, barter, offer to sell, purchase or barter, transport, export or import, at any time or any manner, any bald eagle ... [or any golden eagle], alive or dead, or any part, nest, or egg thereof." The act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest or disturb." *The proposed project construction will not involve destruction of suitable foraging or nesting habitat in the project area.*

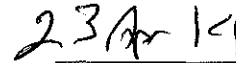
- **Clean Air Act of 1963, as amended.** This act requires any federal entity engaged in an activity that may result in the discharge of air pollutants to comply with all applicable air pollution control laws and regulations (federal, state, or local). This act directs the attainment and maintenance of the National Ambient Air Quality Standards (NAAQS) for six different criteria pollutants, including carbon dioxide, ozone (O₃), particulate matter (PM), sulfur oxides, nitrogen oxides, and lead. *The EA prepared by ADVS indicated that there would be short-term construction related emissions, and de minimis long term operational emissions. However, Coconino County is designated attainment National Ambient Air Quality Standards. Therefore, short-term construction related and de minimis operational emissions would not violate National Ambient Air Quality Standards.*
- **EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations, February 11, 1994.** This order directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health and environmental effects of their programs, policies, and activities on minority populations and low-income populations. *The project would not introduce disproportionately high and adverse human health and environmental effects on the surrounding population; there would be no adverse effect as defined by this EO.*
- **National Historic Preservation Act of 1966, as amended.** Federal undertakings must comply with Section 106 of National Historic Preservation Act, which mandates that potential effects on historic properties be considered prior to approval of such undertakings. Historic properties are defined as sites, districts, buildings, structures, and objects eligible for or listed on the National Register of Historic Places (NRHP). Consideration of these resources is to be made in consultation with the State/Tribal Historic Preservation Office and other interested agencies and parties. *The U.S. Department of Veteran Affairs consulted with the State Historic Preservation Office (SHPO). The SHPO concurred with a determination of "no historic properties affected" for the construction of the cemetery on the 60-acre parcel on May 11, 2012. See ADVS 2013, p. 17.*
- **Native American Graves Protection and Repatriation Act (1990) (25 United States Code 3001–3013).** This act requires protection and repatriation of Native American cultural items found on, or taken from, federal or tribal lands, and requires repatriation of cultural items controlled by federal agencies or museums receiving federal funds. *Should previously unidentified cultural resources, especially human remains, be encountered during construction, work will stop immediately at that location and Bureau of Indian*

Affair's Cultural Resources staff will be notified to ensure proper treatment of these resources.

Project Proponent:



Michael C. Ahn
Colonel, US Army
Chief, Environmental
Programs Division



Date

References

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.