

Northern Arizona Veterans' Memorial Cemetery Final Environmental Assessment

Prepared for

Arizona Department of Veterans Services

Prepared by

SWCA Environmental Consultants

April 2013

**NORTHERN ARIZONA VETERANS' MEMORIAL CEMETERY
FINAL ENVIRONMENTAL ASSESSMENT**

Prepared for

Arizona Department of Veterans Services

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ACRONYMS AND ABBREVIATIONS

%	percent
µg/m ³	micrograms per cubic meter
ADEQ	Arizona Department of Environmental Quality
AMEC	AMEC Environment and Infrastructure, Inc.
amsl	above mean sea level
ADVS	Arizona Department of Veterans' Services
ADWR	Arizona Department of Water Resources
AZGS	Arizona Geological Survey
BMPs	best management practices
CAA	Clean Air Act
Camp Navajo	Camp Navajo military facility
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
DEA	David Evans and Associates
EA	environmental assessment
EA Inc.	EA Engineering, Science, and Technology, Inc.
EO	Executive Order
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
FONSI	Finding of No Significant Impact
FTE	full-time equivalent
GIS	geographic information system
Ma	million years ago
MCOOC	munitions constituents of concern
NAAQS	National Ambient Air Quality Standards
NCA	National Cemetery Association
NEPA	National Environmental Policy Act
NO ₂	nitrogen dioxide
NRCS	U.S. Department of Agriculture Natural Resources Conservation Service
NRHP	National Register of Historic Places
O ₃	ozone
PL	Public Law
PM ₁₀	particulate matter 10 microns in diameter
PM _{2.5}	particulate matter 2.5 microns in diameter
ppm	part(s) per million

SHPO	State Historic Preservation Office
SO ₂	sulfur dioxide
SWCA	SWCA Environmental Consultants
USACE	U.S. Army Corps of Engineers
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
VA	U.S. Department of Veterans Affairs

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EXECUTIVE SUMMARY

The Arizona Department of Veterans' Services (ADVS), acting with deference from the U.S. Department of Veterans Affairs (VA), is responsible for the future construction and operation of a veterans' cemetery on 60 acres of federally owned property, to be deeded from the Department of Defense to the State of Arizona in Bellemont, Coconino County, Arizona. In order to construct the project, federal grant funding is needed. Pursuant to 38 Code of Federal Regulations (CFR) Parts 39.6 and 39.9, ADVS is authorizing a federal grant made available by the VA's National Cemetery Association (NCA) Veterans Cemetery Grants Service, and will oversee the project's master planning process. Funding and construction of this proposed cemetery constitute the Proposed Action reviewed in this document.

The facility would be located on the existing Camp Navajo National Guard facility, approximately 12 miles west of Flagstaff, Arizona, south of Interstate 40. The NCA grant will allow for the master plan to be realized. The master plan process will determine the maximum internment capacity of this site as well as all other features of this site, including but not limited to: entry features, roads, utilities and parking infrastructure, an avenue of flags, an assembly area, full casket gravesites in pre-placed crypts, committal service shelter, columbarium niches and in-ground cremain burial sites, memorial walk, administration and public information buildings, public restroom, maintenance building and service yard, irrigation system, and carillon tower. The master plan shall determine appropriate quantities sufficient enough to support a 10-year projection of burial needs.

The purpose of the Proposed Action is to provide additional burial facilities to eligible veterans in the Northern Arizona area. The need is generated by the current population of veterans in Northern Arizona and projected death rates through 2063, and the need to accommodate the average annual number of veterans who choose to be buried in a veterans' cemetery. By establishing a new facility, this will allow the ADVS to continue to meet the needs of Northern Arizona veterans for many decades.

As ADVS is acting through the VA grant application process, this is a federal action and requires the preparation of an environmental assessment, in accordance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality Regulations for Implementing NEPA (40 CFR 1500–1508) and the VA NEPA Guidance for Projects (VA 2010). NEPA requires that environmental consequences associated with the Proposed Action and the alternatives to the Proposed Action be identified in this document. In addition, the No Action Alternative is addressed.

Chapter 1

INTRODUCTION

1.1 PROJECT BACKGROUND

A new veterans' cemetery facility for Northern Arizona is proposed to be located on property within the Camp Navajo military facility (Camp Navajo), located in Bellemont, Coconino County, Arizona, approximately 12 miles west of Flagstaff, Arizona, south of Interstate 40. The project area is undeveloped and lies between railroad tracks to the north and east, Veterans Drive (unpaved) to the south, and forested land to the west. The project area is part of a much larger parcel (approximately 28,442 acres) owned by "Navajo Army Depot – Federal" (Coconino County 2013). Camp Navajo is operated by the Arizona Army National Guard but the base itself is property of the Department of Defense.

A 60-acre portion of Camp Navajo would be deeded to the State of Arizona, then managed by the Arizona Department of Veterans' Services (ADVS); This, combined with ADVS approval of a federal grant application through the U.S. Department of Veterans Affairs (VA) is the action prompting compliance with the National Environmental Policy Act of 1969 (NEPA) (38 Code of Federal Regulations [CFR] 39). Funding and construction of the proposed cemetery constitute the Proposed Action. The general vicinity of the project area is depicted in Figure 1, and the precise boundaries of the project area are shown in Figure 2.

Initial funding for design of the master plan is provided from the operating budget of ADVS; construction will be funded by the VA's National Cemetery Association (NCA) Veterans Cemetery Grants Program, subject to meeting all of the requirements of availability and approval of the design. NCA will also reimburse AVDS upon approval of the final master plan. Funding and construction is anticipated to begin in October 2013. The cemetery would require connections to service for water, wastewater, electricity, natural gas, and communication, all currently available in the vicinity of the site.

The new cemetery master plan and design process will be in close cooperation with Arizona Department of Administration, ADVS, and VA State Cemetery Grant Program Master Plan requirements and guidelines as well as all other Veterans Cemetery Grants Program design criteria. The grounds and facilities shall be designed for year-round operation and as appropriate to Northern Arizona's climate.

Although the lead agency for an environmental assessment (EA) is usually a federal agency, the VA, NCA Veterans Cemetery Grants Program defers the preparation of the EA and the decision whether to issue a Finding of No Significant Impact (FONSI) to ADVS, pursuant to 38 CFR 39.9 and 38 CFR 39.6 (Howard Orr, personal communication 2013).

1.2 PURPOSE AND NEED

The mission of the ADVS is enriching and honoring Arizona's veterans and their families through education, advocacy, and service. The purpose of the Proposed Action is to provide additional high-quality burial facilities to eligible veterans in the Northern Arizona area. The need is generated by the current population of veterans in Northern Arizona and projected death rates through 2063, and the need to accommodate the average annual number of veterans who choose to be buried in a veterans' cemetery.

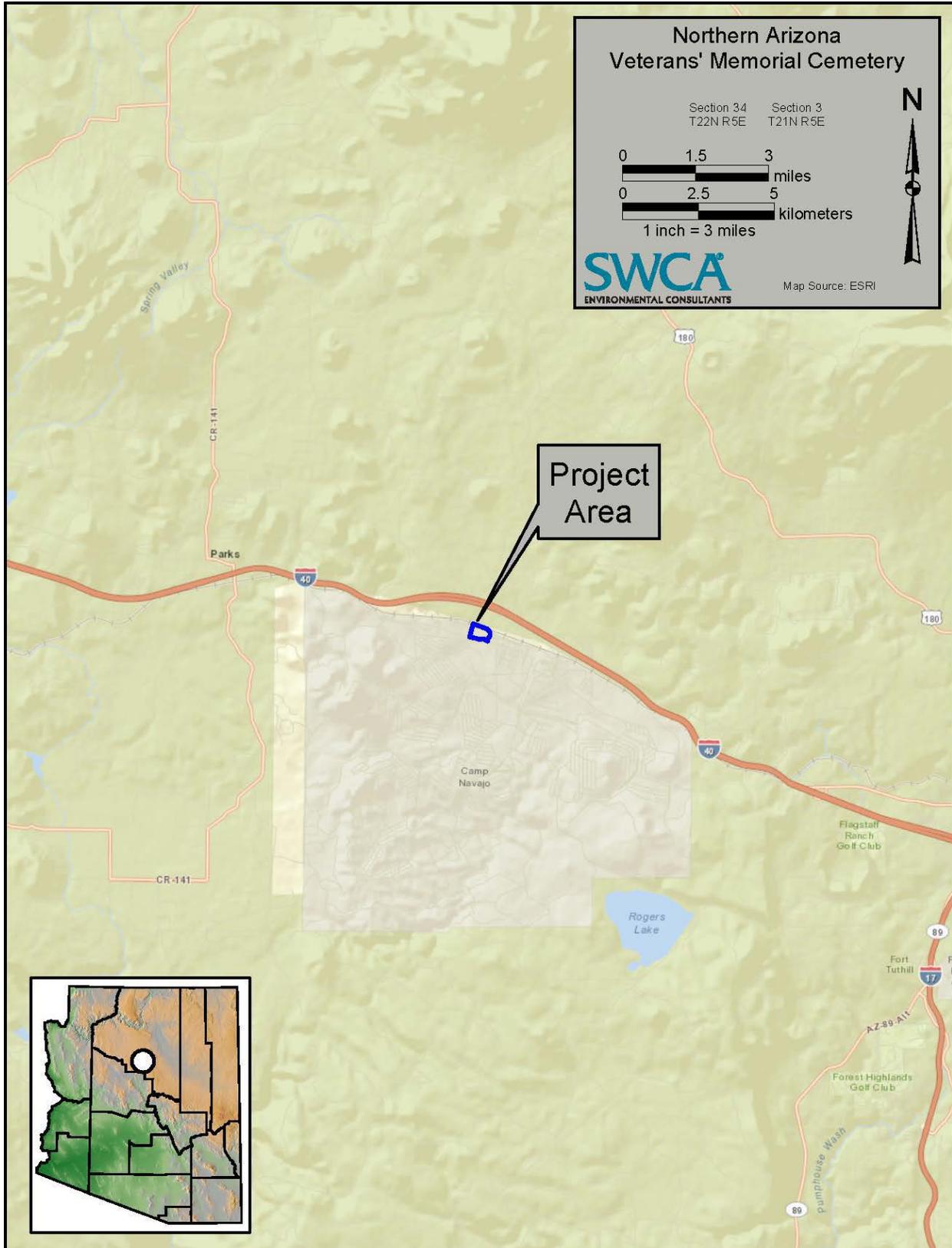


Figure 1. General location of the project area.

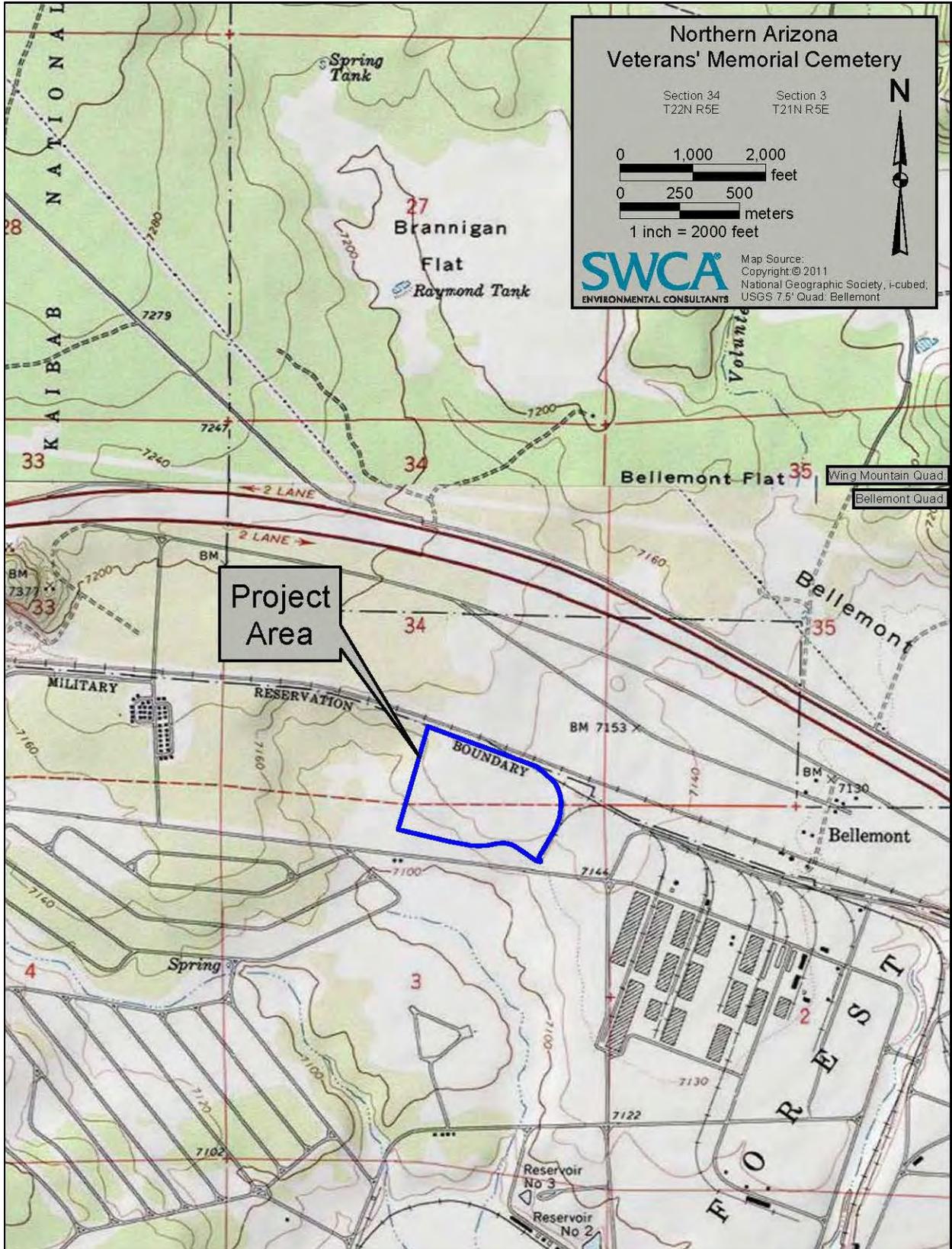


Figure 2. Project area location.

The ADVS estimates that the 10-year average death rate in the projected Northern Arizona service area for the facility (a 75-mile radius) will be approximately 425 veterans per year, and approximately 15% of those would choose to use this new cemetery. It is estimated that an average of one dependent would be buried per every two veterans. Thus, the annual average burial rate would be 96 burials per year. When it is considered that one in four burials is a second interment, the 10-year need for gravesites is approximately 716. Thus ADVS projects that 50 years of burials (traditional burials only) would require approximately 7.76 acres of useable land. Pre-placed crypts only require 1 acre per 1,200 interments (ADVS 2013). Establishing a new facility would allow the ADVS to continue to meet the needs of Northern Arizona veterans for many decades.

1.3 ENVIRONMENTAL ASSESSMENT

NEPA requires federal agencies to evaluate and consider environmental impacts for all federal projects. The level of documentation required depends on the level of impacts. A categorical exclusion is for minor actions that have been previously determined to have no significant environmental impact. An EA is used to determine if a federal project would significantly affect the environment. An environmental impact statement is prepared for actions that are anticipated to significantly impact the environment.

It was determined that an EA is the appropriate level of documentation for the grant approval supporting the proposed new veterans' cemetery facility. An EA is intended to be a concise public document that analyzes the environmental impacts of a proposed action.

This EA was prepared in compliance with NEPA, the President's Council on Environmental Quality (CEQ)'s regulations implementing NEPA (40 CFR 1500–1508), and the VA's NEPA regulations (38 CFR 26).

In carrying out its mission, the VA intends to:

- ensure that all practical means and measures are used to protect, restore, and enhance the quality of the human environment;
- avoid or minimize adverse environmental consequences;
- preserve historical, cultural, and natural aspects of our national heritage; and
- achieve a balance between the use and development of resources within the sustained capacity of the ecological system involved.

1.4 REGULATORY CONTEXT

Compliance with Applicable Laws, Executive Orders, Regulations, Policies, and Community Ordinances

The following is a summary of selected statutes, regulations, and executive orders applicable to this project.

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. The CEQ was established under

NEPA to ensure that all environmental, economic, and technical considerations are given appropriate consideration in this process. This EA complies with NEPA statutes and regulations, the U.S. Department of the Interior Manual, and the Bureau of Indian Affairs NEPA Handbook (59 IAM 3H).

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. There are no jurisdictional waters of the U.S. within the project area.

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.” No wetlands will be affected by this project; therefore, this EO does not apply.

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. 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 [USFWS] 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.

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. Critical habitat, as defined under the act, exists only after USFWS officially designates it. Critical habitat is 1) within the geographic area, features essential to the conservation of the species and that may require special management consideration or protection; and 2) those specific areas outside the geographic area, occupied by a species at the time it is listed, essential to the conservation of the species.

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.

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.

EO 13007, Indian Sacred Sites, 1996. EO 13007 requires that all Executive Branch agencies having responsibility for the management of federal lands will, where practicable, permitted by law, and not clearly inconsistent with essential agency functions, provide access to and ceremonial use of Indian sacred sites by Indian religious practitioners and will avoid adversely affecting the integrity of such sacred sites. The order also requires that federal agencies, when possible, maintain the confidentiality of sacred sites.

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.

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

National Cemetery Act of 1867. This was the first major piece of legislation to provide funds for, and directives about, national cemeteries.

National Cemetery Act of 1973 (PL 93-43). Transferred custody of national cemeteries from the U.S. Army to VA's newly established National Cemetery System. VA cemeteries were elevated to national cemetery status. The U.S. Army retained control of Arlington National Cemetery and the cemetery at the U.S. Soldiers' and Airmen's Home.

Veterans' Housing Benefits Act of 1978 (PL 95-476). Authorized a program of grant assistance to states to establish, expand, and improve state veterans' cemeteries.

State Cemetery Grants Program (Public Law 95-476). The VA's Veterans Cemetery Grants Program was established in 1978 to complement VA's National Cemetery Administration. The program assists states, territories, and federally recognized tribal governments in providing gravesites for veterans in those areas where VA's national cemeteries cannot fully satisfy their burial needs. State veterans' cemeteries enhance VA's ability to meet the burial needs of America's veterans.

Veterans Programs Enhancement Act of 1998 (PL 105-368). Redesignated the National Cemetery System as the National Cemetery Administration, and designated the position of Director of the National Cemetery System as the Under Secretary for Memorial Affairs. Authorizes the federal government to pay

all costs of establishing, improving, or expanding State-owned and -operated veterans' cemeteries. States, however, retain responsibility for costs associated with acquiring land, and operational costs.

Veterans Millennium Health Care and Benefits Act (PL 106-117). Directed the VA Secretary to contract with one or more qualified organizations to conduct independent studies for improvements to veterans' burial benefits and for improvements to veterans' cemeteries. Mandated the Secretary to establish national cemeteries in the six U.S. areas where they are most needed.

Veterans Benefits Act of 2003 (PL 108-183). Expanded eligibility for burial in a national cemetery to remarried surviving spouses of deceased veterans. Permanently authorized the State Veterans' Cemeteries Grant Program under the VA.

Veterans' Benefits Act of 2010 (PL 111-275). Expanded eligibility for burial in a national cemetery to parents of certain interred veterans. Required a new study for establishing cemeteries in five designated areas.

38 United States Code Section 2406: Acquisition of lands. States that as additional lands are needed for national cemeteries, they may be acquired by the Secretary by purchase, gift (including donations from States or political subdivisions thereof), condemnation, transfer from other federal agencies, exchange, or otherwise, as the Secretary determines to be in the best interest of the United States.

38 CFR Part 26 — Environmental Effects of the Department of Veterans Affairs Actions.

The purpose of this part is to implement NEPA in accordance with regulations promulgated by the CEQ (CEQ Regulations, 40 CFR 1500–1508), and EO 11514, March 5, 1970, as amended by EO 11991, May 24, 1977. This part shall provide guidance to officials of the VA on the application of the NEPA process to VA activities. It states that the VA must act with care in carrying out its mission of providing services for veterans to ensure it does so consistently with national environmental policies. Specifically, VA shall ensure that all practical means and measures are used to protect, restore, and enhance the quality of the human environment; to avoid or minimize adverse environmental consequences, consistently with other national policy considerations.

38 CFR Part 38 — National Cemeteries of the Department of Veterans Affairs. The purpose of this part, among other details, is to describe naming conventions, who may or may not be buried, and the types of headstones and markers which may be used.

38 CFR Part 39 — Aid for the establishment, expansion, and improvement, or operation and maintenance, of Veterans Cemeteries. This part sets forth the mechanism for a State or Tribal organization to obtain a grant to establish, expand, or improve a veterans' cemetery that meets VA's national shrine standards of appearance that is or will be owned by the State, or operated by a Tribal organization on trust land, or to obtain a grant to operate or maintain a State or Tribal veterans' cemetery to meet VA's national shrine standards of appearance.

1.5 AGENCY SCOPING, CONSULTATION, AND PUBLIC INPUT

An agency scoping notice was mailed to federal, State, local, and tribal agencies on March 5, 2013. The complete scoping distribution list is presented in Chapter 5, Consultation and Coordination. A public scoping notice was mailed to eight adjacent landowners and posted at the following locations:

- ADVS Headquarters – 3839 North 3rd Street, Suite 200, Phoenix, AZ 85012
- Camp Navajo Administration – Hughes Avenue, Bellemont, AZ 86015

In addition, the scoping notice was published in the March 6, 2013 *Arizona Daily Star*. All mailed, posted, and published notices provided a 30-day comment period. A copy of the newspaper, agency, and adjacent property owner scoping notices are located in Appendix C. Five comments were received in response to the scoping notice. Copies of the comment letters are presented in Appendix C.

Arizona Department of Environmental Quality Letters

The Arizona Department of Environmental Quality (ADEQ) commented on the potential impacts to air quality caused by dust emissions during construction. The letter recommended measures to minimize disturbance of particulate matter. The project will adopt best management practices (BMPs) to mitigate dust emissions (i.e., minimize ground disturbance, reseed cleared areas as construction continues).

ADEQ issued another letter regarding hazardous waste and water quality, specifically addressing the Superfund status of parts of Camp Navajo, and potential need for 1) a stormwater discharge permit during construction, 2) application for new public drinking water systems, and 3) an aquifer protection permit.

A Phase I Environmental Site Assessment completed for the cemetery location in 2012 (SWCA Environmental Consultants [SWCA] 2012) determined 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. The proposed water source for the cemetery would be a new well drilled on-site. Any source of potable water for the project area would need to meet State and federal standards for drinking water quality.

The project will develop a stormwater pollution prevention plan and maintain BMPs in order to comply with the ADEQ's stormwater construction general permit.

The project will receive water from a new well drilled on-site. Water quality is generally very good but will be tested and treated on-site as needed; an application for a new well will be submitted to the Arizona Department of Water Resources (ADWR), and an Approval to Construct Drinking Water Facilities application will be submitted to ADEQ for approval. No injection wells, dry wells, or septic systems requiring an Aquifer Protection Permit will be constructed.

Hopi Tribe Letter

The Hopi Tribe asked to be consulted if prehistoric cultural sites are identified during excavation. They also recommended to stop working if cultural features or deposits are found; and that human remains or funerary objects discovered require immediate reporting.

Adjacent Property Owner

Lorie B. Holly of William W. Bones Investment & Realty Co., an adjacent landholder, was concerned that current land use and zoning may change to accommodate the proposed cemetery's quiet setting, thus limiting use and reducing property value. The local setting is already a mix of undeveloped forest with adjacent industrial warehouses and a major railway; the proposed cemetery does not require or propose new easements, land use variances or any type of modification or to its property, or adjacent properties, so as to restrict existing or planned building types or uses.

Coconino County Board of Supervisors

The letter expressed general support for the proposed project.

Chapter 2

PROPOSED ACTION AND ALTERNATIVES

NEPA requires that environmental consequences associated with the Proposed Action and the alternatives to the Proposed Action be identified in this document. The following chapter describes the two alternatives evaluated in this document: the Proposed Action Alternative and the No Action Alternative. Included in the Proposed Action Alternative is a description of the intended uses of the project area. Also included in this chapter is a discussion of the alternatives considered but eliminated from further consideration.

2.1 PROPOSED ACTION ALTERNATIVE

Under the Proposed Action, ADVS would authorize a federal grant made available by the VA's NCA Veterans Cemetery Grants Program, and will oversee the project's master planning process. Currently part of Camp Navajo, the site would be deeded to the State of Arizona from the Department of Defense, then managed by ADVS; however the transfer of title is not the federal action considered. Rather, the ADVS approval of a federal grant application through the VA is the action prompting compliance with NEPA (38 CFR 39).

Proposed Facilities

The facility proposed for Northern Arizona is to be located on property adjacent to the existing Camp Navajo National Guard facility, located approximately 12 miles west of Flagstaff, Arizona, off of Interstate 40. A site of 60 acres would be deeded to the ADVS for this project. Site access from the public roadway would be shared with Camp Navajo.

The project would include in-ground casket burials, columbaria walls, in-ground cremain burials, and a scatter garden with memorial walls. The site is planned to maximize interment for as many years as possible with each phase supporting approximately 10 years of service. The first phase of development includes the following numbers of interment types:

- In-ground double-depth pre-placed crypts – 274
- In-ground cremain burial sites – 222
- Columbaria niches – 220
- Memorial wall markers – 528

Preserving and incorporating this site's features into the landscape design would serve to emphasize the undeveloped surroundings. This includes capturing views to the San Francisco Peaks and protecting as many of the existing pine trees as possible. The overall design would provide burial options for local veterans in a serene landscape that is blended into the natural landscape of the area. A curving roadway would lead visitors into the facility through stone entry walls and ornamental gates. The cemetery administration building would be located near the entrance with an adjacent parking area for visitors. In addition, the cemetery would be supported by an assembly area and committal shelter oriented on San Francisco Peaks. The maintenance facility would be located on the south edge of the project area, with separate access directly off a road shared with Camp Navajo. It would be set at a lower elevation than the main cemetery, and built into the slope so the maintenance building could act as a visual buffer between

the maintenance facility and the main cemetery. A depiction of the proposed veterans' cemetery is shown in Figure 3 below.

The master plan process will determine the maximum internment capacity of this site as well as all other details and features of the facility, including but not limited to: entry features, roads, utilities and parking infrastructure, an avenue of flags, an assembly area, full casket gravesites in pre-placed crypts, committal service shelter, columbarium niches and in-ground cremain burial sites, memorial walk, administration and public information buildings, public restroom, maintenance building and service yard, irrigation system, and carillon tower.

Infrastructure

Currently, the project area is undeveloped and has no infrastructure. Camp Navajo does have networks of electrical, water, gas, sewer, and other key infrastructure in place. Their proximity and utility to the proposed project varies (David Evans and Associates [DEA] 2013; DEA et al. 2013).

Construction of the Proposed Action would require key utilities to support the administration and public information buildings, public restroom, maintenance building, and irrigation system. The drilling and operation of one on-site well is planned for the Proposed Action, which would provide water for all facility needs (landscaping, plumbing, drinking water). Water would be tested periodically and treated on-site. No injection wells, dry wells, or septic systems are planned for the facility. Sanitary wastes would most likely be carried by a new underground gravity collection system directly to a new on-site sewer vault that would regularly be pumped empty. The sewer vault system would be appropriately sized and engineered to be able to process waste from the anticipated number of workers and visitors.

Arizona Public Service would provide 12.47-kilovolt power from its distribution system to a stepdown transformer to transform the power to a usable voltage. Camp Navajo also has a network of natural gas lines (DEA 2013; DEA et al. 2013).

Construction

Construction is expected to last from 12 to 18 months. Construction would entail grading portions of the project area, including the locations of proposed roadways and foundations. Following installation of infrastructure such as electricity and water, foundations would be poured for structures and roads would be paved. Structures would be constructed using conventional methods, and columbarium niches and other ancillary structures would be installed. Although outdoor lighting fixtures have not been chosen, they would likely be chosen to comply with local guidelines and ordinances to minimize the effects of light pollution. Exposed areas of soil would be stabilized as they are presented, and final landscaping would finish construction. Heavy equipment would include road graders, dump trucks, loaders, roller-compactors, excavators, backhoes, bulldozers, and paving equipment. Construction activities would likely occur only during daytime hours.

Operation and Maintenance

Daily operation of the facility would include routine maintenance such as mowing grass, watering vegetation, and facility repairs. Visitors to existing gravesites would quietly come and go throughout the day. Funerals would take place intermittently throughout the year, weather permitting.

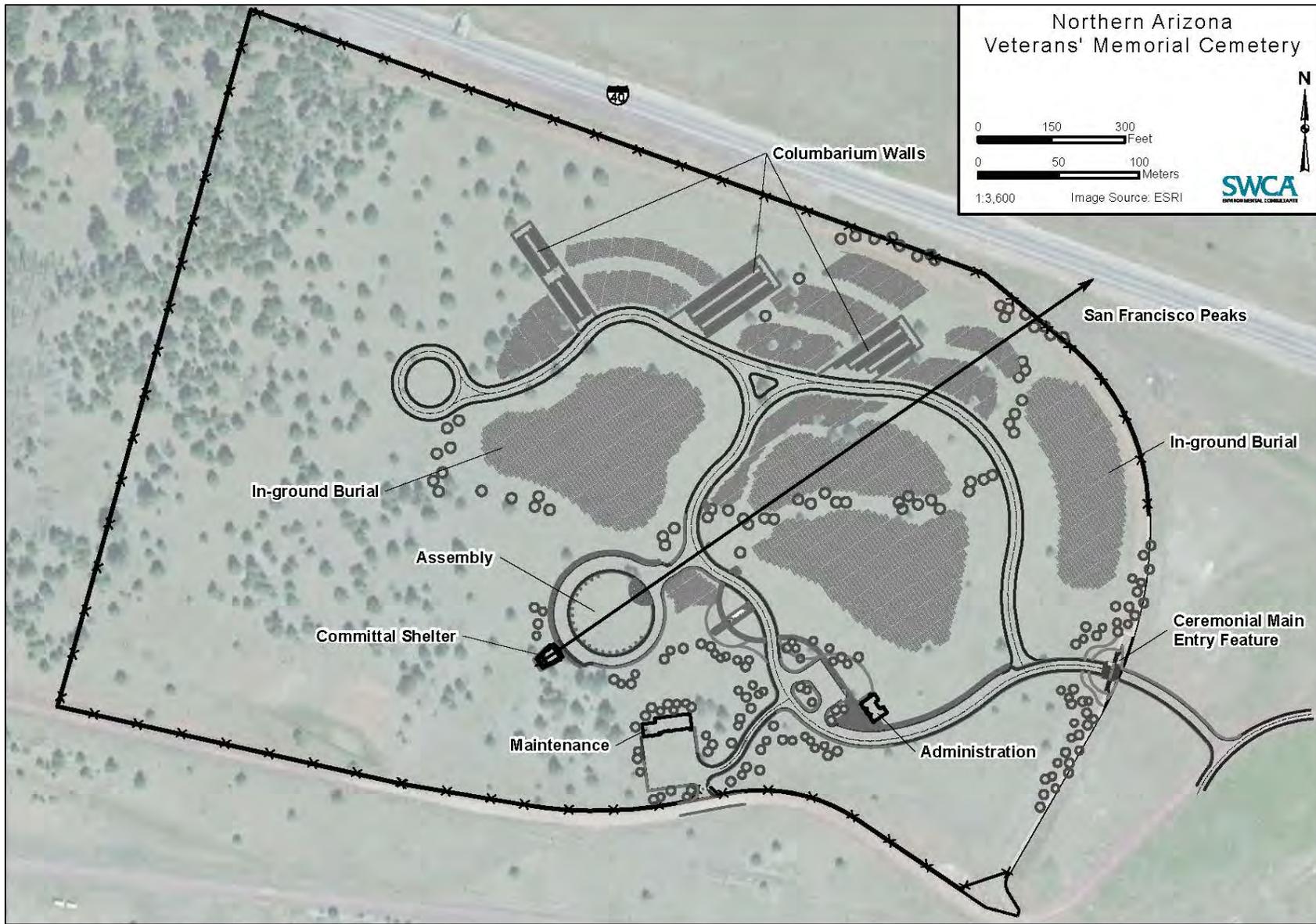


Figure 3. Proposed master plan facilities.

2.2 NO ACTION ALTERNATIVE

Under this alternative, the ADVS would not develop the proposed facility at the proposed or any location. Veterans would then have the option to utilize the veterans' cemetery in Sierra Vista, Arizona, approximately 340 miles and 5 hours' drive to the south, or use private cemeteries for local burial services.

2.3 ALTERNATIVES CONSIDERED BUT ELIMINATED

A second location within Camp Navajo, located on the eastern side of Camp Navajo, was considered by ADVS for the proposed project but eliminated from consideration. The second location was determined to be too close to a rifle range on the property, which presented a significant noise concern for the location of a cemetery. Additionally, one of the primary goals of the Proposed Action is to provide a high quality viewshed experience, which includes views of the San Francisco Peaks. This alternative site did not provide a clear viewshed and would have required considerably more land clearance to accomplish project designs.

Chapter 3

AFFECTED ENVIRONMENT

The purpose of this chapter is to describe 1) the existing environment that may be affected by either of the project alternatives, and 2) the type and magnitude of impacts anticipated to occur from each alternative's implementation. Impacts were identified and quantified to the extent practicable, given the scope of the project and reasonably attainable data. The resources considered include the following:

- Aesthetics and Noise (Section 3.1)
- Air Quality (Section 3.2)
- Cultural Resources (Section 3.3)
- Geology and Soils (Section 3.4)
- Hydrology and Water Quality (Section 3.5)
- Living Resources (Section 3.6)
- Land Use (Section 3.7)
- Floodplains and Wetlands (Section 3.8)
- Socioeconomics (Section 3.9)
- Solid Waste and Hazardous Materials (Section 3.10)
- Transportation and Parking (Section 3.11)
- Utilities and Community Services (Section 3.12)
- Environmental Justice (Section 3.13)
- Cumulative Impacts (Section 3.14)
- Potential for Generating Substantial Controversy (Section 3.15)

3.1 AESTHETICS AND NOISE

Noise and Light

The Noise Control Act of 1972 gives the U.S. Environmental Protection Agency (EPA) the authority to establish noise regulations to control major sources of noise, including transportation vehicles and construction equipment. The most widely accepted land use-related noise standards are those of the U.S. Department of Transportation's Federal Highway Administration and the U.S. Department of Housing and Urban Development. The most significant existing ambient noise sources are the adjacent railroad and Interstate 40, approximately 0.4 mile to the north.

Sensitive noise receptors are considered to be residences, hospitals, libraries, recreation areas, churches, and other similar uses. The nearest occupied structure to the proposed facility is an industrial facility approximately 1,200 feet to the east. The nearest sensitive receptor would be a residence located nearly 1 mile to the north, across Interstate 40. No other sensitive receptors exist near the proposed development. Noise generated during construction would be commensurate with any construction site with typical earth-moving equipment, and cemeteries generally produce very low noise levels during operation.

Light pollution (obtrusive or unwanted nighttime lighting) is a side effect of human-occupied areas. It is of special concern to nearby Flagstaff, the world's first International Dark Sky City and home of Lowell, U.S. Naval, and other astronomical observatories. Coconino County and the City of Flagstaff have sought to protect dark skies through a series of comprehensive outdoor lighting ordinances. Lighting at the proposed facility would comply with local guidelines and ordinances to minimize the effects of light pollution from the facility by use of shields, dimmers, and/or full cutoff lighting fixtures.

Visual Resources

Landscapes and their scenic quality vary according to the diversity of landforms, vegetation, and cultural or human-made features present. In general, landscapes with greater diversity of features are considered to be of higher scenic quality. The Coconino County Comprehensive Plan does address visions, goals, and policies for landscapes and open space in the county. In general, the goal for landscapes and open space in Coconino County is to ensure the preservation of open space for purposes including “for the purposes of preserving scenic viewsheds” (Coconino County 2003:pp84).

The project area and immediately adjacent lands offer little topographic variation, and vegetation consists of grasslands with some ponderosa pine. The general area of the project has also been highly modified by previous human activities and development to include railroad tracks and spurs, and numerous industrial and warehouse-type structures. Visual features observable from the project area also include vistas of the San Francisco Peaks to the northeast.

3.2 ENVIRONMENTAL CONSEQUENCES

Proposed Action Alternative

The development of the Proposed Action Alternative would result in no significant long-term increase in noise or light over that presently occurring in the project area. Construction noise would be intermittent and temporary. Operational noise would be virtually silent. Outdoor lighting would comply with local guidelines and ordinances to minimize the effects of light pollution.

Similarly, the development of the Proposed Action Alternative would result in no significant decrease in the scenic quality of the landscape, and would not obstruct or detract from valuable views of the San Francisco Peaks. The Proposed Action would only include a few low structures on the southern part of the facility. These structures would minimize obstructed views of the San Francisco Peaks, as preservation of that view is integral to the design of the facility.

No Action Alternative

Under the No Action Alternative, ambient noise and light in the area would not be expected to change. Likewise, under the No Action Alternative, no additional construction would occur and thus there would be no impact on visual resource conditions.

3.3 AIR QUALITY

Climate

The Bellemont area, where the project area is located, has an arid climate typical of the Arizona high desert. Coconino County has an “arid steppe cold arid” climate (Kottek et al. 2006) with four distinct seasons. The combination of high elevation and low humidity provide relatively mild weather conditions throughout most of the year. Nearby Flagstaff averages approximately 22 inches of precipitation per year, most of which arrives in the form of winter snow or July and August monsoon thunderstorms (The Weather Channel, LLC 2013).

Regulatory Standards and Governing Agencies

Since 1970, the federal Clean Air Act (CAA) and subsequent amendments have provided the authority and framework for EPA regulation of emission sources and the establishment of requirements for the monitoring, control, and documentation of activities that will affect ambient concentrations of certain pollutants that may endanger public health or welfare. Under the CAA, each State or delegated permitting authority has the responsibility to achieve and maintain air quality that meets the NAAQS. EPA regulates activities affecting air quality on federal lands and most Indian lands. Federal lands are not subject to Arizona’s State Implementation Plan.

The EPA has promulgated primary and secondary NAAQS for six criteria pollutants: carbon monoxide (CO), nitrogen dioxide (NO₂), two size categories of particulate matter (PM₁₀ and PM_{2.5}), O₃, sulfur dioxide (SO₂), and lead. The primary standards are concentration levels of pollutants in ambient air, averaged over a specific time interval, designed to protect public health with an adequate margin of safety. The secondary standards are concentration levels judged necessary to protect public welfare and other resources from known or anticipated adverse effects of air pollution. Although States may promulgate more stringent ambient standards, the State of Arizona has adopted standards identical to the federal levels (see Arizona Administrative Code Title 18, Chapter 2, Article 2). Table 1 presents the NAAQS for five of the six “criteria” pollutants, including both primary standards (pertaining to human health) and secondary standards (pertaining to human welfare, such as visibility, socioeconomics, and effects on flora and fauna). Lead is not measured, as it generally does not pose a problem since the removal of lead from gasoline.

Table 1. National Ambient Air Quality Standards

Pollutant	Averaging Period	Primary (µg/m ³)	Secondary (µg/m ³)
NO ₂	Annual	100 (0.05 ppm)	100 (0.05 ppm)
SO ₂	3-hour	–	1,300
	24-hour	365 (0.14 ppm)	–
	Annual	80 (0.03 ppm)	–
CO	1-hour	40 (35 ppm)	–
	8-hour	10 (9 ppm)	–
O ₃	1-hour	240 (0.12 ppm)	240 (0.12 ppm)
	8-hour	160 (0.08 ppm)	160 (0.08 ppm)

Table 1. National Ambient Air Quality Standards (Continued)

Pollutant	Averaging Period	Primary ($\mu\text{g}/\text{m}^3$)	Secondary ($\mu\text{g}/\text{m}^3$)
PM _{2.5}	24-hour	65	65
	Annual	15	15
PM ₁₀	24-hour	150	150
	annual	50	50

Source: *Arizona Administrative Register* Vol. 11, Issue 36, September 2, 2005; EPA (2011).

Notes: $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter; ppm = parts per million.

Criteria Pollutant Nonattainment Areas in the Project Vicinity

EPA identifies “attainment” areas as those regions within the country where the concentration of one or more criteria pollutants is below the NAAQS. “Nonattainment” areas are regions within the country where the concentration of one or more criteria pollutants exceeds the NAAQS. Coconino County is not a designated nonattainment area for the Clean Air Act’s NAAQS (EPA 2012a).

Particulate Matter

Particulate matter consists of small solid and liquid particles 10 microns in diameter or smaller, also called PM₁₀. Although these particles are a major contributor to the frequent “brown cloud” in the Phoenix area, Coconino County is not a designated nonattainment area for PM₁₀ (EPA 2012b). Although additional standards have been promulgated for PM_{2.5}, Coconino County is not a designated nonattainment area (EPA 2012c).

Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, earth-moving and construction activities associated with development of the project would necessarily result in unquantifiable short-term increases in level of dust (PM₁₀ emissions), both as a direct result of construction work and from worker traffic to, from, and around the project area on dirt roads. Potential impacts from these operations would be very minor and would vary from day to day depending on meteorological conditions such as wind or rain.

No Action Alternative

Under the No Action Alternative, no construction would occur and there would be no changes in air quality.

3.4 CULTURAL RESOURCES

Human occupation of Camp Navajo and the surrounding area began prior to 10,000 years ago with arrival of the Paleoindians. Although no Paleoindian projectile points have been found at Camp Navajo, a few have been found to the southwest, northwest, and east of the facility. Starting in the beginning of the Holocene, Archaic hunter-gatherers moved about the landscape in search of plant and animal resources.

Forty-five Archaic sites representing Early through Late Archaic (6000–500 B.C.) populations have been recorded within the boundaries of Camp Navajo. During the Formative Period (500 B.C.–A.D. 1300), people used the area primarily for resource procurement; the majority of the sites are temporary use camps. Ceramics associated with the Sinagua and/or the Cohonino are found at these sites and date primarily from A.D. 700–1150. After A.D. 1150, Sinagua and Cohonino populations moved out of the area and there is a gap in occupation at the facility until the Protohistoric (A.D. 1300–1540). During the Protohistoric, the Havasupai, the Yavapai, and the Western Apache made use of the area in and around Camp Navajo.

Although the beginning of the Historic period is assigned to A.D. 1540, when Francisco Vázquez de Coronado encountered the Hopi, intensive use of the area during the Historic period was not seen until the mid to late nineteenth century with the arrival of ranchers and loggers. Ranching in the vicinity of the project area involved primarily cattle with some sheep ranching. Logging activities up until the 1930s can be seen in logging camps and the remains of logging railroads. After the Great Depression, the Camp Navajo Ordnance Depot was constructed to house and distribute military equipment and supplies during World War II. The depot employed and housed Hopi and Navajo workers during World War II. After the war, the depot continued to be used for military training and other activities and is still in use today.

Previous Investigations Within and Near the Proposed Action

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 all accessible NRHP-eligible sites within Camp Navajo were visited (Tremblay et al. 2008). A historic building survey of all standing buildings and structures within the depot has also been conducted (Deiber and Rupnik 2006; Doyle and Associates 1994).

Although a large inventory was developed for the entire Camp Navajo property, no archaeological sites or historical structures or buildings (historic properties) have been recorded in the Proposed Action project area (Tremblay et al. 2008). No NRHP-eligible historic properties have been recorded in the immediate vicinity (0.25 mile) of the project area.

Environmental Consequences

Proposed Action Alternative

Because no NRHP-eligible historic property has been recorded in or in the immediate vicinity of the project area, no direct or indirect impacts are anticipated from the Proposed Action.

The State Historic Preservation Office (SHPO) concurred with a determination of "no historic properties affected" for the current undertaking on May 11, 2012 (Appendix B), only with respect to the 60 acres for the Proposed Action. All construction activities, temporary easements, and staging areas will be limited within the 60-acre boundary. No further cultural resources investigations are recommended. However, in the event that cultural resources are encountered during construction and earth-moving for the Proposed Action, all ground-disturbing activities should cease, and the person in charge should immediately contact ADVS for further evaluation.

No Action Alternative

Under the No Action Alternative, no development would occur. Thus no impacts to cultural resources are anticipated under this alternative.

3.5 GEOLOGY AND SOILS

Information from an ADEQ report on the Open Burn/Open Detonation Area and the Installation Restoration Project indicates that Camp Navajo area is underlain by unconsolidated Quaternary alluvial deposits, volcanic rocks of Quaternary and Tertiary age and Paleozoic sedimentary rocks, mostly sandstones, limestones, and shales. Outcrops of the volcanic unit are predominantly basaltic and range from lava flows to cinder cones. Thirteen volcanic vents have been identified within Camp Navajo's boundaries. Several faults have been identified cutting Paleozoic sedimentary rocks and Quaternary-Tertiary volcanic rocks. These faults are regionally important with respect to groundwater sources and recharge (ADEQ 2011).

U.S. Geological Survey (USGS) online spatial mineral resources data indicate that the project area is mapped within a broad area of Holocene to middle Pliocene basaltic rocks (Middle Pliocene to Holocene) that surrounds the bases of nearby mountains. These basaltic rocks consist of mostly dark basaltic lava and cinders young enough that some original volcanic landforms are still apparent. The mapping unit also includes a small amount of andesite, dacite, and rhyolite. Rocks of this map unit are largely restricted to six areas widely distributed in Arizona: San Francisco and Uinkaret volcanic fields in northern Arizona (0–4 million years ago [Ma]); Springerville (0–4 Ma) and San Carlos (0–2 Ma) volcanic fields in east-central Arizona; and San Bernardino (0–1 Ma) and Sentinel (1–4 Ma) volcanic fields in southern Arizona. Rocks of this unit are also present in the extreme southwestern part of Arizona, where they were erupted at the edge of the Pinacate volcanic field (0–2 Ma) in northwestern Sonora (0–4 Ma).

Mountains to the north are mapped as Holocene to middle Pliocene volcanic rocks (Middle Pliocene to Holocene). These rocks are rhyolite to andesite deposited as a sequence of lava flows and associated rocks and are generally light to medium gray, tan, or reddish brown. These rocks are part of the San Francisco volcanic field (0–4 Ma) (Richard et al. 2000; USGS 2012).

A preliminary geotechnical assessment performed by AMEC Environment & Infrastructure, Inc. (AMEC), stated that bedrock in the project area consists of Tertiary to Quaternary basalt flows, including agglomerates and cinders. Outcrops of rock are common in the surrounding hillsides and the small basin is locally filled with some alluvium, colluviums, and residual soils from in-situ weathering of the underlying bedrock. Near-surface rock at the project area consists of volcanic basalt flows, likely from a single flow event. Basalt exposed at the surface and in the test pits is hard and moderately weathered. The basalt is fractured with a resulting block size that varies from a few inches to several feet in diameter and fractures are filled with clays that have a medium to high plasticity.

Test pits encountered basalt rock at a depths ranging from about 1.5 to 4.5 feet below the surface, with typical depths ranging from 1.5 to 2.5 feet. It is anticipated that the depth to basalt throughout the project area is within this range (AMEC 2013).

Land subsidence and fissures generally occur in the vast alluvial valleys of Arizona; none are known to occur on the project area or adjacent areas (Arizona Geological Survey [AZGS] 2013a). No mineral deposits or valuable resources are known to be located within the project vicinity (AZGS 2013b).

Soils data from the U.S. General Soil Map (State Soil Geographic Database, or "STATSGO") indicates that the project area is located in an area mapped as Derecho cobbly loam (U.S. Department of Agriculture Natural Resources Conservation Service [NRCS] 2013a). These soils are deep, well drained soils that formed in material weathered from shale and sandstone. These soils are typically found on Canyon and Mountain slopes on southerly aspects. They formed in material weathered from interbedded shale and sandstone. Derecho soils exhibit medium runoff and have moderately slow permeability. They are used for timber production, range, recreation, water production and wildlife habitat. Native vegetation

on the soils is typically Gambel oak, mountain mahogany, and various grasses with widely spaced Douglas-fir, white fir, and ponderosa pine. Depth to bedrock in derecho soils is more than 60 inches (NRCS 1999). More detailed digital data for the vicinity of the project area are not complete, and/or no data are available (NRCS 2013b).

AMEC's preliminary geotechnical assessment stated that soils at the site are residual soils formed of weathered basalt material. Soils encountered in the test pits are typically sandy clay with varying amounts of gravel, cobbles, and boulders; and clayey sand and gravel. The soils are moist, and medium to high in plasticity (AMEC 2013).

Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, the ADVS would construct and operate a veterans' cemetery. Impacts to earth resources would be minimal. Local geology and topography would not be affected, and although on-site soils would be disturbed, they do not contain any high-value earth resources. No impacts to geology or topography would occur under the Proposed Action Alternative, and no significant impact to soils would occur.

No Action Alternative

Under the No Action Alternative, the project area would remain in its current condition. No impacts to geology, topography, or soils would occur under the No Action Alternative.

3.6 HYDROLOGY AND WATER QUALITY

Hydrology

Information from an ADEQ report on the Open Burn/Open Detonation Area and the Installation Restoration Project indicates that the regional water table, occurring in the Coconino-Supai sandstone aquifer, is encountered at approximately 1,500 feet below ground surface. Several perched water tables, controlled by local geologic conditions, are present above the regional unconfined aquifer. These perched saturated zones have been identified at various depths to 350 feet and have historically been the predominant source of groundwater in wells immediately adjacent to Camp Navajo.

The nearby city of Flagstaff relies on the Coconino aquifer for its municipal drinking water; its production wells are located at the Woody Mountain Wellfield, 3 miles southeast of the eastern boundary of Camp Navajo. Since 2003, Camp Navajo and the Town of Bellemont have also begun to tap the regional aquifer. Within the Coconino aquifer, groundwater flow is north to northeast (ADEQ 2011). For Camp Navajo, the sources of water are a 3,000-foot-deep water well, spring water, and ponds throughout the base.

The project area is located in the north of the Central Highlands Planning Area, which encompasses approximately 13,900 square miles. The planning area includes all or part of three watersheds and is characterized by a band of mountains consisting of igneous, metamorphic, and sedimentary rocks. High elevations, steep topography, and extensive bedrock result in relatively high runoff and small water storage capacity, compared with the vast alluvial basins of the basin-and-range landforms in central and southern Arizona.

Although most of the planning area is within the Central Highlands transition zone, the project area is located within the Plateau Uplands physiographic province on the Colorado Plateau. This physiographic province is characterized by high desert plateaus and incised canyons. The Central Highlands Planning Area is composed of five groundwater basins oriented east-west in central Arizona. This planning area contains areas of higher elevation, compared with many other parts of the state, and is characterized by narrow valleys separated by steep mountain ranges. Elevation ranges from 1,500 feet to more than 12,600 feet above mean sea level (amsl).

Within the Verde River basin, in which the project area is located, the Verde Valley sub-basin is approximately 2,500 square miles in size. The principal aquifer is the Verde Formation, which consists of a thick sequence of tertiary limestones and sandstones at an estimated depth of 4,200 feet. Locally perched groundwater provides small amounts of water locally. Other aquifers include the carbonate aquifer and an alluvial aquifer along the Verde River. Most groundwater enters the sub-basin from the Coconino Plateau and moves through the carbonate aquifer to discharge at springs and seeps along the Verde River. Groundwater primarily flows toward the Verde River drainage (ADWR 2009).

Numerous wells occur in the vicinity of the project area, primarily to the east. Water levels of wells in the vicinity of the project area were reported to range from 21 to 220 feet below ground surface. Sources of water on Camp Navajo are a 3,000-foot-deep water well, spring water, and ponds throughout the base. An existing 10-inch water line runs along the southern boundary of the site.

There are no surface water features on or adjacent to the project area, except for a small (80 × 35 feet) excavated borrow pit to the south which retains water. No drainages maintain defined channels within the project area; infiltration and overland sheet flow dominate. Because the borrow pit retains water perennially, it may be regulated by the U.S. Army Corps of Engineers (USACE) as a jurisdictional water of the U.S.

Water Quality

Currently, there is no known contamination of groundwater below the project site, as there are no drinking or monitoring wells. An Operational Range Assessment Program Phase I Qualitative Assessment Report, prepared by EA Engineering, Science, and Technology, Inc. (EA Inc.), in May 2008, evaluated 17 operational ranges at Camp Navajo totaling 26,397.55 acres. The purpose was to assess whether further investigation was needed to determine whether potential munitions constituents of concern (MCOC) are or could be migrating off-range at levels that may pose an unacceptable risk to human health or the environment. EA Inc.'s report found that "despite the utilization of military munitions on the operational ranges at Camp Navajo, the migration of on-range MCOC to off-range receptors is unlikely. Pathways via surface water and groundwater do not exist due to the soil composition, high evapotranspiration rates, depth to groundwater, and sporadic precipitation" (EA Inc. 2008).

For burial grounds, underground resources would be checked to verify that the proposed use of the site does not interfere with spring water or groundwater. Burial grounds generally need to be isolated from underground water resources. The NCA Facilities Design Guide for pre-placed crypt fields requires an under drainage system for sites such as this that are not well drained. The Camp Navajo site is underlain by weathered basalt interspersed with high plasticity clay and cannot be considered to be well drained. A hydraulic analysis was recommended to demonstrate that stormwater cannot back into the crypt field via the under drain system (AMEC 2013). The use of a sewer vault instead of a septic field would further protect spring water and groundwater.

Environmental Consequences

Proposed Action Alternative

Because of landscape watering needs, future water use under the Proposed Action Alternative would be higher than current use. However, the capacity of the proposed on-site water system is designed to be sufficient for building fire protection, domestic water use, and irrigation, without affecting other users.

Groundwater quality would not be impacted; no wells exist within the project area. One well is planned for the Proposed Action, which would provide water for all facility needs (landscaping, plumbing, and drinking water). The well capacity is designed for 60 gallons per minute. Water would be treated on-site as needed. No injection wells, dry wells, or septic systems are planned for the facility; groundwater would be protected by the use of an under drainage system and a sewer vault (DEA et al. 2013).

The only surface water on the property is a ponded borrow pit. Existing drainage from the property does not carry large storm flows and has no direct connection with washes or streams. There are no plans to impact the feature; there would be no measurable impact on existing surface water resources in the vicinity of the project area as a result of the Proposed Action Alternative.

Impacts to groundwater capacity would be minimal from development of the single well, as water demands in the Bellemont area are low; many wells drilled in the area have had no measurable impact on the deep aquifer from which they draw (ADWR 2009). No impact to surface water quality or groundwater quality would be associated with the Proposed Action Alternative.

No Action Alternative

As no development would take place, there would be no impact to the quantity or quality of existing water resources in the vicinity of the project area as a result of the No Action Alternative.

3.7 LIVING RESOURCES

Ecological Overview

The project area occurs in the Plains and Great Basin Grasslands and the Rocky Mountain and Madrean Montane Conifer Forests biotic communities (Brown 1994). The elevation of the project area is approximately 7,140 feet amsl. The project area is bordered by the BNSF railway on the north. In the surrounding area, there are roads, railways, and buildings associated with Camp Navajo on lands managed by the Arizona Army National Guard and Arizona Department of Emergency and Military Affairs. Interstate 40 is approximately 0.5 mile to the north.

Vegetation

The project area is primarily grasslands and the northern corner of the project area is ponderosa pine (*Pinus ponderosa*) forest. The vegetation in the grasslands includes rabbitbrush (*Ericameria* sp.), blue grama (*Bouteloua gracile*), mountain muhly (*Muhlenbergia montana*), prairie Junegrass (*Koeleria macranthra*), squirreltail (*Elymus* sp.), common mullein (*Verbascum thapsus*), and scattered ponderosa pine. The northern corner of the project area is dominated by ponderosa pine. The project area is relatively undisturbed; one non-native plant species, prickly Russian thistle (*Salsola tragus*), was observed in the project area.

Species Evaluation

None of the 22 threatened or endangered species listed for Coconino County by the USFWS are likely to occur in the project area. The project area is clearly 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. Habitat requirements, potential for occurrence, and possible effects on these species are summarized in Appendix A.

According to Arizona Heritage Geographic Information System (AZHGIS), the project area does not occur in 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 (AZHGIS 2013). According to AZHGIS (2013), there are seven occurrence records for special-status species within 3 miles of the project area: northern goshawk (*Accipiter gentilis*), bald eagle-winter population (*Haliaeetus leucocephalus*), Navajo Mexican vole (*Microtus mexicanus navaho*), long-eared myotis (*Myotis evotis*), Arizona myotis (*Myotis occultus*), long-leagged myotis (*Myotis volans*), and cinder phacelia (*Phacelia serrata*). Additionally, the results indicated that this project area is within the designated 10J area (i.e., the designated area for the reintroduction and experimental population recovery efforts for the species) for California condor (*Gymnogyps californianus*).

Environmental Consequences

Proposed Action Alternative

Direct adverse impacts to vegetation communities resulting from operation are not anticipated to occur. Marginal indirect adverse impacts to animal communities may result from increased visitor traffic within the project area. Ground disturbance from construction may cause temporary loss of habitat, and constructed areas will cause permanent loss of habitable area on a de minimis scale, when taken in context with the available surrounding habitat. No plants observed within the project area are subject to State or local native plant ordinances. No plants protected under the Endangered Species Act occur within the project area; therefore, the Proposed Action would not affect these resources. The project has been designed to minimize development in forested parts of the project area.

The biological review for the Proposed Action determined that neither threatened and endangered species nor Critical Habitat occurs within the project limits. Although the project area is located in the southern portion of the 10J area (i.e., the non-essential experimental population area for California condor), there are no cliffs or other suitable nesting sites within the project area, and individuals of this species currently only reside in the Vermilion Cliffs area. Therefore, the Proposed Action would not affect these resources.

No species of concern and no State- or federally protected plant species are known to occur within the project area; therefore, no additional impacts are anticipated.

Although some vegetation would be removed as part of the Proposed Action, migratory bird species would not be significantly affected. Large tree removal causing short-term loss of habitat will be minimal; additionally, suitable habitat for migratory species may increase in the project area via tree planting as part of the cemetery landscaping. During construction, mitigation measures, including sensitive tree removal, will help minimize inadvertent disturbance of birds, nests, or eggs.

Construction activities have potential to introduce and/or spread invasive species in the project vicinity. Non-native plants or seeds can be carried into a work area on equipment, and some invasive species are disturbance adapted and may be more successful than competing native species in disturbed areas.

To prevent the introduction of invasive species seeds, all earth-moving and hauling equipment shall be washed at the contractor's storage facility prior to entering the construction site. All disturbed soils that will not be landscaped or otherwise permanently stabilized by construction shall be seeded using species native to the project vicinity. To prevent invasive species seeds from entering or leaving the site, BMPs should include inspecting construction equipment and removing all attached plant/vegetation and soil/mud debris prior to leaving the construction site.

No Action Alternative

Under the No Action Alternative, no impacts to vegetation or wildlife are anticipated.

3.8 LAND USE

Current Land Uses

The project area is currently vacant and unused. It is located within the boundaries of the Camp Navajo Army National Guard Base, under the operational control of the Arizona National Guard. Camp Navajo operates as a Multi-Service Training Site for all branches of the military service: Army, Air Force, Navy, and Marines (Active and Reserve). Camp Navajo is the primary training site in the state of Arizona for maneuver training and is capable of supporting battalion-size units. Camp Navajo encompasses 28,255 acres and is classified as an intermediate training area. Training Ranges and Areas available consist of gun ranges for training and qualification, a land navigation course, maneuver and bivouac areas, vertical and horizontal operations for engineers, airmobile operation areas, mountain and winter training areas, and company and battalion size training and evaluations areas. Camp Navajo has 227 miles of paved or maintained surface roads and 38 miles of railroad track. Camp Navajo has access to the main line of the BNSF Railroad and Railhead Operations (Camp Navajo 2013a).

Camp Navajo Industrial Operations provides depot-level logistical support to sustain and maintain the military readiness of various Department of Defense agencies. Services Camp Navajo provides include the receipt, storage, maintenance, inventory, surveillance, and shipping of a variety of commodities. Camp Navajo has the ability to enter into Interservice Support Agreements with federal agencies. Industrial infrastructure includes workshops, surveillance facilities, 2.3 million square feet of general purpose warehousing, and both rail and truck loading facilities (Camp Navajo 2013b). A National Guard Bureau-approved concept plan allows for the use of idle or underutilized storage capacity to generate revenues and support the installation's operation. Their storage customers now include civilian and commercial users. Camp Navajo does not store nuclear and radiological materials, biological or chemical agents, or hazardous waste (Camp Navajo 2012a).

Land surrounding the project area includes the BNSF railroad to the north, followed by undeveloped parcels of private and National Forest land and Interstate 40. A few industrial facilities occur 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. Overall, land use is sparse in the vicinity (less than 1 mile).

Planned Land Uses

Current initiatives that are being pursued by Camp Navajo, the Arizona Army National Guard, and the National Guard Bureau are development of up to 800 acres for use as an industrial park under the

Enhanced Use Lease concept; placement of a veterans' cemetery (this report); construction of a new fire station; replacement of the 65-year-old water distribution system; and replacement of the electrical distribution system. Other long-term possibilities that are being considered through the Camp Navajo strategic planning process are expansion of storage missions for the U.S. Air Force and the U.S. Navy large rocket motor programs (Camp Navajo 2012a, 2012b; National Guard Bureau 2012). Other than the proposed cemetery, Camp Navajo has no other planned use of the project area.

Environmental Consequences

Proposed Action Alternative

Under the Proposed Action Alternative, there would be no impacts to the current or planned uses of surrounding lands. The use of the project area would change from vacant unused land to a cemetery facility.

No Action Alternative

Under the No Action Alternative, there would be no impact on existing land uses on or in the vicinity of the project area.

3.9 FLOODPLAINS AND WETLANDS

Floodplain, Drainage, and Stormwater Runoff

Because of its hilltop and hillside location, its slope, and its elevation above the nearest surface waters, the project area is not located within a floodplain. The nearest mapped floodplain area is nearly 0.5 mile to the south (Coconino County 2013).

No drainages maintain defined channels within the project area; infiltration and overland sheet flow dominate. Existing drainage from the property does not carry large storm flows and has no direct connection with washes or streams.

The USACE regulates activities involving dredge and fill material within waters of the U.S. No formal delineation of waters or wetlands has been conducted or approved by the USACE for the proposed project. A small excavated borrow pit exists in the south of the project area. However, because the borrow pit retains water perennially, it may be regulated by the USACE as a jurisdictional water of the U.S. No other water features or wetlands are located on the project area.

Environmental Consequences

Proposed Action Alternative

The Proposed Action Alternative does not include plans to fill, remove, drain, or otherwise alter the borrow pit, the only water-related feature on the project area. Therefore, there would be no impacts to potential waters of the U.S. on the project area. Similarly, the project area does not include floodplains. Therefore, there would be no impact to floodplains.

No Action Alternative

Under the No Action Alternative, there would be no impact on existing floodplains or wetlands on or in the vicinity of the project area.

3.10 SOCIOECONOMICS

This section of the EA addresses socioeconomic conditions within the study area, including population and demographics, employment and income, economic development, and environmental justice. Because employment and income data from the U.S. Census Bureau were not available for Bellemont, Arizona, data from Coconino County are used herein. According to the data, the county had a population of 134,421 in 2010. The median age was 31 years, and the majority (66%) of the population was white/caucasian. American Indians (27%) and persons of Hispanic or Latino origin (14%) made up most of the remainder. Median household income was \$49,615, employment of those over 16 years of age was 67%, and nearly 20% of persons were below poverty level (American Community Survey 2013a; U.S. Census Bureau 2013).

Regarding burial options, there is currently only one veterans' cemetery serving all of Arizona. It is located in Sierra Vista, approximately 340 miles and 5 hours drive to the south.

Environmental Consequences

Proposed Action Alternative

Initial projections for the operations of the Proposed Action would create jobs for one cemetery director, one equipment operator, one groundskeeper, and 0.42 administrators (shared with other facilities). Because the administrator would likely be located in Phoenix, the facility would require a total of three full-time equivalent (FTE) employees (ADVS 2013).

Construction of the proposed facility would likely employ dozens of workers for the construction period, including both skilled and unskilled labor. Most of the construction jobs would likely be from local (Flagstaff region) sources, and the three FTE employees would necessarily be persons living in Bellemont or the Flagstaff area.

The construction of the proposed facility is expected to employ dozens of workers. During construction, workers would likely patronize local businesses, resulting in a direct short-term benefit to the local economy.

Although the long-term number of new jobs and possible increase in local revenue are not expected to be significant, the Proposed Action would provide a neutral to net positive economic benefit to the local area through increased revenue and job generation. The Proposed Action would not displace any residents or induce population shifts and would not affect demographic trends or changes the local or regional identity. Funeral attendees and other visitors to the proposed facility would require food and lodging, which may have a marginal increase in revenues at the local hotel and restaurant, and also to hotels and eateries in the Flagstaff area.

The ADVS estimates that the 10-year average death rate in the projected Northern Arizona service area for the facility (a 75-mile radius) will be approximately 425 veterans per year, and approximately 15% of those would choose to use this new cemetery. It is estimated that an average of one dependent would be buried per every two veterans. Thus, the annual average burial rate would be 96 burials per year. When it

is considered that one in four burials is a second interment, the 10-year need for gravesites is approximately 716. Thus ADVS projects that 50 years of burials (traditional burials only) would require approximately 7.76 acres of useable land. Pre-placed crypts only require 1 acre per 1,200 interments (ADVS 2013). By establishing a new facility, this will allow the ADVS to continue to meet the needs of Northern Arizona Veterans for many decades.

Because the only projected socioeconomic changes are likely to be positive, there would be no negative impacts related to demographics, employment and income, economic development, and environmental justice.

No Action Alternative

Under the No Action Alternative, the facility would not be constructed. Potential revenue and employment increases anticipated with the construction of the facility, though small, would not be realized. The No Action Alternative would leave the Southern Arizona Veterans' Memorial Cemetery in Sierra Vista as the only veterans' cemetery in Arizona. This facility is located approximately 340 miles and 5 hours drive to the south. Many veterans, especially those with Navajo, Hopi, or Apache heritage, would prefer burial in Northern Arizona.

3.11 SOLID WASTE AND HAZARDOUS MATERIALS

As part of a Phase I Environmental Site Assessment (ESA) of the project area conducted in 2012 (SWCA 2012), a review of federal and State records was completed to access environmental records for the project area and the surrounding properties. The proximity of listed facilities was reviewed to determine the potential effect, if any, these facilities may have on the project area. The databases searched include those specified by ASTM Standard E 1527-05, as well as several additional federal, State, and other databases. The Phase I ESA also included review of the ADEQ Interactive Geographic Information System (GIS) eMaps website (ADEQ 2012), review of several documents regarding the history of Camp Navajo and various environmental cleanups, and interviews with personnel working for Camp Navajo's environmental programs.

The Phase I ESA found that although 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 (SWCA 2012).

The Phase I ESA 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 (SWCA 2012).

Environmental Consequences

Proposed Action Alternative

The project area is not known to currently contain any hazardous materials or other safety hazards for the public. Hazardous wastes generated during construction may include small quantities of waste oil and oil

filters, and other used fluids and coolants generated by equipment maintenance. However, most equipment maintenance would likely occur off-site. Additional waste could include small quantities of spent batteries, spent welding materials, solvents, cleaners, paint, or other materials. Wastes would be drummed and periodically removed and disposed of at regulated facilities; recycling of hazardous wastes would be evaluated as appropriate. Hazardous wastes generated during construction would be commensurate with any normal construction site. During operation of the veterans' cemetery, no hazardous waste generation is anticipated. Implementation of the Proposed Action Alternative would not contribute new hazardous materials or safety hazards to the project area. There would be no impacts from the use or generation of hazardous materials during construction or operation of the veterans' cemetery.

Solid wastes generated during construction would consist primarily of wood, steel, and other construction materials; cardboard and packaging materials; and vegetation and debris from site clearing and grading. All non-hazardous solid wastes generated during construction would be collected and disposed of in a properly licensed landfill. Recycling of non-hazardous solid wastes would be evaluated as appropriate. There would be no impacts from the generation of solid waste during construction or operation of the veterans' cemetery.

During construction, sanitary waste from most construction areas would be collected in portable toilets. Construction trailers may tie into the planned on-site sewer vault system or may have additional portable toilets nearby. During operations, sanitary wastes would be carried by an underground gravity collection system directly to an on-site sewer vault that would regularly be pumped empty. The use of a sewer vault would further protect spring water and groundwater. The sewer vault system would be appropriately sized and engineered to be able to process waste from the anticipated number of workers and visitors.

No Action Alternative

Under the No Action Alternative, there would be no impact to or from hazardous materials, solid waste, or sanitary waste on or in the vicinity of the project area.

3.12 TRANSPORTATION AND PARKING

This section of the EA addresses transportation and access in and around the general project location. A description of the local transportation network, as well as access into the project area, is included in this section.

Transportation Networks

The proposed project area is accessible from Interstate 40 via approximately 0.5 mile of Hughes Avenue (the entrance to Camp Navajo) and Veterans Drive, a 20-foot-wide paved roadway that leads past the project area. Approximately 0.25 mile of currently unpaved road completes the route. Interstate 40 is a public highway, and Hughes Avenue is only used by persons entering Camp Navajo. Veterans Drive is only shared by other users of the remote western portions of Camp Navajo.

The project area is currently undeveloped and hence there is no parking. Project plans include parking at the administration and maintenance buildings, as well as on-site roads sufficiently wide for roadside parallel parking. There are no other facilities in the vicinity with parking lots.

Environmental Consequences

Proposed Action Alternative

Additional traffic generated by the Proposed Action would not be considered a significant impact to transportation and traffic patterns on any local roadways, or on parking capacity in the vicinity of the project area. Should traffic need to be diverted around the construction area, traffic on the access road is very minimal and alternate routes exist.

No Action Alternative

Under the No Action Alternative, there would be no impacts to transportation and traffic patterns or parking. This alternative would result in no significant impacts to traffic conditions or access.

3.13 UTILITIES AND COMMUNITY SERVICES

The project area is undeveloped and currently has no infrastructure. Camp Navajo does have networks of electrical, water, gas, sewer, and other key infrastructure in place. Their proximity and utility to the proposed project varies (DEA 2013; DEA et al. 2013).

Fire protection is available from Camp Navajo Fire Department, with support available from the nearby Ponderosa Fire District. Ponderosa Fire District Station 82 is located in Bellemont, and is an all-hazard agency that provides traditional fire services, emergency medical services, wildland firefighting, public education, and prevention inspections.

Police service is available from the 856th Military Police Company on Camp Navajo, with support available from the Coconino County Sheriff's Office and Arizona Department of Public Safety.

Environmental Consequences

Proposed Action Alternative

Sanitary wastes would most likely be carried by a new underground gravity collection system directly to a new on-site sewer vault that would regularly be pumped empty. The use of a sewer vault would further protect spring water and groundwater. The sewer vault system would be appropriately sized and engineered to be able to process waste from the anticipated number of workers and visitors. Implementation of the Proposed Action would not have any impacts to the local sewer system.

Because the operations phase of the Proposed Action includes only a few full-time personnel, the facility would use only small quantities of water, natural gas, electricity, and other utilities. The quantities of electricity, natural gas, water, and other utilities utilized by the Proposed Action as a fraction of Camp Navajo's supply would be minimal.

Local fire, rescue, and law enforcement personnel are available to serve the project area, and it is anticipated that no new police or fire personnel would be needed to satisfy the needs of the proposed facility. Implementation of the Proposed Action would not have any impacts to the local fire, rescue, and law enforcement departments.

Construction of the Proposed Action Alternative would not interfere with, interrupt service from, disrupt, or impact users of existing utilities and services. Under the Proposed Action Alternative, there would be no impacts to local utilities or services.

No Action Alternative

No new infrastructure would be installed on the project area under the No Action Alternative, and none of Camp Navajo's existing utilities infrastructure would be used. Existing police, fire, and rescue teams would continue normal operations.

3.14 ENVIRONMENTAL JUSTICE

Presidential EO 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (*Federal Register* 59:7629), instructs federal agencies to incorporate environmental justice as part of their mission. As such, federal agencies are directed to identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations.

For this analysis, the State of Arizona and Coconino County were compared and contrasted to assess the significance of the low-income and minority populations within the community. Accurate post-2000 census data are not available for the town of Bellemont to compare with county and state data. Within Coconino County, the minority and low-income populations are above the average for the state of Arizona (Table 2).

Table 2. Arizona Population, Income, and Employment Data

Location	Total Population (2010)	Minority Population (% non-white)	Families Below Poverty Level (%)	Unemployment (%)	Disabled Population (%)	Elderly Population (%)
State of Arizona	6,392,017	15.4	16.2	5.5	Data not available	13.6
Coconino County	134,421	33.3	19.8	5.3	Data not available	10.8

Source: American Community Survey 2013a-c

Environmental Consequences

Proposed Action Alternative

As discussed in Section 3.9 above, the Proposed Action would have a neutral to net positive effect on the surrounding community by providing additional opportunities for employment as well as generating revenue for local hotels and eateries. Under the Proposed Action Alternative there would be no negative effects with regard to environmental justice.

No Action Alternative

Under the No Action Alternative, the facility would not be constructed and the potential for community benefits would not be realized.

3.15 CUMULATIVE IMPACTS

Cumulative impacts also were considered in this document. Cumulative impacts result when the effects of an action are added to or interact with other effects in a particular place and within a particular time frame. For example, one construction project may not have a measurable significant effect on the noise levels in a particular area, but if several construction projects occur at the same time, there may be a measurably significant effect on noise levels in the area. It is the combination of effects that is the focus of a cumulative impact analysis. Projects in the vicinity of the project area that have been considered in the assessment of cumulative impacts include past projects, present projects, and reasonably foreseeable future projects.

- **Past Projects:** Although Camp Navajo is currently used as a National Guard training site, a recent (2002) National Guard Bureau–approved concept plan allowed for the use of idle or underutilized storage capacity to generate revenues and support the installation’s operation. Storage customers now include civilian and commercial users (Camp Navajo 2012a).
- **Current Projects:** Current initiatives that are being pursued by Camp Navajo, the Arizona Army National Guard, and the National Guard Bureau are development of up to 800 acres for use as an industrial park under the Enhanced Use Lease concept; placement of a veterans’ cemetery (this report); construction of a new fire station; replacement of the 65-year-old water distribution system; and replacement of the electrical distribution system.
- **Reasonably Foreseeable Future Projects:** Future possibilities that are being considered through the Camp Navajo strategic planning process are expansion of storage missions for the U.S. Air Force and the U.S. Navy large rocket motor programs (Camp Navajo 2012a, 2012b; National Guard Bureau 2012). Other than the proposed cemetery, Camp Navajo has no planned use of the project area except for the proposed cemetery. Well water for the project area may require further purification. The condition of the water supply line is unknown, and a maintenance agreement may be required for use of the water line. The proximity and condition of Camp Navajo’s network of natural gas lines would need to be evaluated. Resources that would not be directly affected by the Proposed Action are not factored into the Cumulative Impacts analysis because if a resource would not be directly affected, then the Proposed Action would not contribute to the cumulative impacts from all actions. The following resources are discussed with respect to cumulative impacts in more depth.

Soils

Cumulative impacts on soil resources from the potential future use of 800 acres as an industrial park would include grading, removal, and compaction of soils. A stormwater pollution prevention plan, which would be required for the industrial park, would include measures to prevent erosion and degradation of nearby soils, which would somewhat reduce the loss of soil resources. Other land in the vicinity would remain in its current condition of semidisturbed high desert habitat. Cumulative impacts to soil in the area would not be significant.

Utilities

If the potential 800-acre industrial park were to come to fruition, that facility would require a communication network and adequate supply of safe water, gas, electricity, and other key utilities. However, development of an industrial park would likely be contingent upon either upgrades to Camp Navajo infrastructure or on providing their own connections. Development of an industrial park may spur

improvements to Camp Navajo resources, but the basic infrastructure is already in place and upgrades would not have significant cumulative environmental impacts.

Use of existing utilities by the proposed project would be minimal quantities as a fraction of Camp Navajo's supply, and would not impact the supply to the base. Assessing the conditions of the water supply and natural gas lines, and purifying water supplies would not have environmental impacts.

3.16 POTENTIAL FOR GENERATING SUBSTANTIAL CONTROVERSY

The proposed construction and operation of the Northern Arizona Veterans' Cemetery has had considerable support from ADVS and from Camp Navajo, and the general public overwhelmingly supports veterans. No concerns regarding the proposed facility were raised during project scoping and agency consultation in relation to the proposed project and the environmental review process. With respect to the topics discussed in above sections, no issues arose that are believed to create conflicts with humans or with the environment that would appear to be controversial. Therefore, there is no significant potential for generating substantial controversy.

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Chapter 4

ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

4.1 IMPACT SUMMARY

This section describes the environmental consequences of those resources identified in Chapter 3 as having some degree of negative effects. Table 3 below concisely summarizes the findings of Chapter 3 and identifies how each resource is or is not affected.

Table 3. Impact Summary

Resource/ Resource Use	Proposed Action Alternative	No Action Alternative
Aesthetics and Noise	Temporary, short-term increase in noise during construction. No significant increase in light pollution. No significant decrease in the scenic qualities of the landscape.	No impact expected.
Air Quality	Temporary, short-term increase in PM ₁₀ emissions during construction.	No impact expected.
Cultural Resources	No impact expected.	No impact expected.
Geology and Soils	No impact to geology. On-site soils would be disturbed, but they do not contain any valuable earth resources. Therefore, impacts would be minor.	No impact expected.
Hydrology and Water Quality	No impact expected.	No impact expected.
Living Resources	No impact to protected species. Vegetation would be disturbed, but no high-value vegetation exists. Pine trees would be protected as possible. Therefore, impacts would be minor.	No impact expected.
Land Use	No impact expected.	No impact expected.
Floodplains and Wetlands	No impact expected.	No impact expected.
Socioeconomics	Minor positive impacts are possible.	Minor impacts from unrealized revenues.
Solid Waste and Hazardous Materials	No impacts expected.	No impact expected.
Transportation and Parking	No impacts expected.	No impact expected.
Utilities and Community Services	No impact expected.	No impact expected.
Environmental Justice	No impact expected.	No impact expected.
Cumulative Impacts	No significant impact expected.	No impact expected.
Potential for Generating Substantial Controversy	No impact expected.	No impact expected.

4.2 MITIGATION MEASURES

For the resources identified in Chapter 3 and summarized in Table 3 above that are anticipated to have some degree of negative impacts, measures to mitigate for the effects of those potential impacts are described below.

Aesthetics and Noise

Coconino County has sought to protect dark skies through a series of comprehensive outdoor lighting ordinances. Lighting at the proposed facility would comply with local guidelines and ordinances to minimize the effects of light pollution from the facility by use of shields, dimmers, and/or full cutoff lighting fixtures.

Air Quality

BMPs for dust suppression would be implemented by the contractor during construction to control temporary dust emissions. This could include wetting dusty roadways and minimizing ground-disturbing activities during periods of high winds.

Geology and Soils

No grading or soil disturbance would occur outside of areas necessary for construction of the facility. Although a soil reclamation plan is not required, contractors may stockpile topsoil during grading to be redistributed appropriately.

Living Resources

To prevent the introduction of invasive species seeds, all earth-moving and hauling equipment shall be washed at the contractor's storage facility prior to entering the construction site. All disturbed soils that will not be landscaped or otherwise permanently stabilized by construction shall be seeded using species native to the project vicinity.

To prevent invasive species seeds from leaving the site, BMPs will be implemented to ensure all construction equipment is inspected for attached plant/vegetation and excessive soil/mud debris prior to leaving the construction site.

Chapter 5

CONSULTATION AND COORDINATION

As discussed in the agency scoping summary in Section 1.5, federal, State, local, and Tribal agencies and adjacent landowners were contacted during project development. The contacted parties are listed below. A copy of the agency and public scoping notice is provided in Appendix C.

Federal Agencies

U.S. Army Corps of Engineers, Los Angeles District, Phoenix Office
U.S. Environmental Protection Agency
U.S. Fish and Wildlife Service, Arizona Ecological Services Field Office
U.S. Federal Highway Administration – Arizona Division

State Agencies

Department of Emergency and Military Affairs
Arizona Department of Environmental Quality
Arizona State Governor's Office – Honorable Janice K. Brewer
Arizona Department of Water Resources
Arizona Game and Fish Department
Arizona Department of Public Safety – Highway Patrol Division
Arizona Department of Emergency and Military Affairs (State National Guard)
Arizona Department of Veterans' Services
Arizona Department of Real Estate
State Historic Preservation Office

Local Agencies

Coconino County Board of Supervisors
Coconino County Manager
Coconino County Department of Public Works
Coconino County Planning and Zoning
Coconino County Flood Control

Arizona Tribes

Yavapai Apache Nation
Navajo Nation
Havasupai Indian Reservation
Hopi Tribe
Hualapai Tribe
Kaibab-Paiute Tribe
Yavapai-Prescott Indian Tribe

Adjacent Property Owners

Bellefont Development Company

SCA Tissue North America

Harris Living Trust

Schuff Steel Company

BNSF Railway Company

Coconino National Forest

Camp Navajo Industrial Operations

Camp Navajo Army National Guard Base

Chapter 6

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Chapter 7

LITERATURE CITED

- AMEC Environment and Infrastructure, Inc. (AMEC). 2013. *Preliminary Geotechnical Assessment Northern Arizona Veterans Cemetery*. AMEC Job No. 17-2012-4064. Kenneth C. Fergason, PG, Tony J. Freiman, PE. February 11, 2013.
- Arizona Department of Environmental Quality (ADEQ). 2011. *Camp Navajo – Open Burn/Open Detonation Area and the Installation Restoration Project*. Available at: <http://www.azdeq.gov/envIRON/waste/sps/download/state/campnavob.pdf>. Accessed March 5, 2013.
- . 2012. Interactive Geographic Information System eMaps website. Available at: <http://www.azdeq.gov/function/programs/gis.html>. Accessed March 3, 2013.
- Arizona Department of Veterans' Services (ADV S). 2013. Veterans Cemetery Worksheet for Northern Arizona Veterans' Memorial Cemetery.
- Arizona Department of Water Resources (ADWR). 2009. *Arizona Water Atlas*, Vol. 5: Central Highlands Planning Area. Hydrology Division, Arizona Department of Water Resources.
- Arizona Geological Survey (AZGS). 2013a. Arizona's Earth Fissure Center. Available at: <http://www.azgs.az.gov/EFC.shtml>. Accessed March 4, 2013.
- . 2013b. Mineral map of Arizona. Available at: <http://www.azgs.az.gov/images/Minerals/mineralmap.jpg>. Accessed March 4, 2013.
- Arizona Heritage Geographic Information System (AZHGIS). 2013. Arizona Game and Fish Department online environmental review tool. Available at: <http://www.azgfd.gov/hgis>. Accessed February 7, 2013.
- Brown, D.E. (ed.). 1994. *Biotic Communities: Southwestern United States and Northwestern Mexico*. Salt Lake City: University of Utah Press.
- Camp Navajo. 2012a. Camp Navajo History. Available at: http://www.campnavajo.com/index.php?which_page=history. Accessed March 3, 2013.
- . 2012b. Camp Navajo Information. Available at: <http://brochure.campnavajo.com/index.php?width=1680&page=welcOME>. Accessed March 3, 2013.
- . 2013a. Camp Navajo Training Site. Available at: http://www.campnavajo.com/index.php?which_page=ts_intro. Accessed March 14, 2013.
- . 2013b. Camp Navajo Industrial Operations. Available at: http://www.campnavajo.com/index.php?which_page=io_intro. Accessed March 3, 2013.
- Coconino County. 2003. *Coconino County Comprehensive Plan: Land Use*. Available at: http://www.coconino.az.gov/uploadedFiles/Community_Development/CommunityCharacter.pdf. Accessed February 8, 2013.

- . 2013. Coconino parcel viewer interactive GIS mapping. Available at: <http://www.coconino.az.gov/ParcelViewer/>. Accessed March 5, 2013.
- David Evans and Associates (DEA). 2013. Camp Navajo Master Utility Exhibit. DE&A Job No. ADOA0001. Dated January 2013.
- David Evans and Associates (DEA), Walker Macy, and Orcutt Winslow. 2013. ADVS Northern Arizona Veterans Memorial Cemetery 35% Documents Submittal. March 7, 2013.
- Deiber, C., and M. Rupnik. 2006. *Historic Building Survey of the Camp Navajo Ordnance Depot, Bellemont, Arizona*. Marion, Iowa: The Louis Berger Group, Inc.
- Doyle and Associates, Inc. 1994. *Camp Navajo, Arizona Historic Building Survey*. Phoenix: Doyle and Associates.
- EA Engineering, Science, and Technology, Inc. (EA Inc.). 2008. *Final Operational Range Assessment Program Phase I Qualitative Assessment Report - Camp Navajo, Arizona*. Available at: <http://64.78.11.86/uxofiles/enclosures/camp-navajo.pdf>. Accessed March 4, 2013.
- Orr, H.R., Jr., RLA. 2013. Email from Howard Orr, Project Manager of U.S. Department of Veterans Affairs, to Homer Rogers, Assistant Deputy Director of Arizona Department of Veterans' Services. Dated February 7, 2013.
- Kottek, M., J. Grieser, C. Beck, B. Rudolf, and F. Rubel. 2006. World map of the Köppen-Geiger climate classification updated. Available at: <http://koeppen-geiger.vu-wien.ac.at/usa.htm>. Accessed March 5, 2013.
- National Guard Bureau. 2012. Camp Navajo environmental restoration. Available at: http://envrestoration.campnavajo.com/erp_aboutERP.htm. Accessed March 4, 2013.
- Richard, S.M., S.J. Reynolds, J.E. Spencer, and P.A. Pearthree. 2000. Geologic map of Arizona. Arizona Geological Survey Map 35. Scale 1:1,000,000.
- SWCA Environmental Consultants (SWCA). 2012. *Phase I Environmental Site Assessment for the Proposed Camp Navajo Cemetery in Bellemont, Arizona*. Phoenix.
- Tremblay, Adrienne, David R. Purcell, and Douglas R. Mitchell. 2008. *Camp Navajo: A Cultural Resources Survey of Approximately 25,000 Acres of the Western Mogollon Rim at Bellemont, Coconino County, Arizona*. SWCA Cultural Resources Report No. 07-56. Phoenix: SWCA Environmental Consultants.
- U.S. Census Bureau. 2013a. American Community Survey Demographic and Housing Estimates. Available at: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_11_5YR_DP05. Accessed March 4, 2013.
- . 2013b. American Community Survey Selected Social Characteristics in the United States. Available at: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_11_5YR_DP02. Accessed March 4, 2013.

- . 2013b. American Community Survey Selected Economic Characteristics. Available at: http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_11_5YR_DP03. Accessed March 4, 2013.
- U.S. Department of Agriculture Natural Resources Conservation Service (NRCS). 1999. Official Soil series description of derecho series soils. Available at: https://soilseries.sc.egov.usda.gov/OSD_Docs/D/DERECHO.html. Accessed March 4, 2013.
- . 2013a. Web soil survey. Available at: <http://websoilsurvey.nrcs.usda.gov>. Accessed March 4, 2013.
- . 2013b. U.S. General Soil Map (STATSGO2). Available at <http://soildatamart.nrcs.usda.gov> . Accessed February 3, 2013.
- U.S. Department of Veterans Affairs (VA). 2010. *NEPA Interim Guidance for Projects*. Office of Construction and Facilities Management. September 30.
- U.S. Environmental Protection Agency (EPA). National Ambient Air Quality Standards (NAAQS). Available at: 2011. <http://www.epa.gov/air/criteria.html>. Accessed March 5, 2013.
- . 2012a. US EPA Green Book: Counties Designated Nonattainment for Clean Air Act's National Ambient Air Quality Standards. Available at: <http://www.epa.gov/oaqps001/greenbk/mapnpoll.html>. Accessed March 5, 2013.
- . 2012b. US EPA Green Book: Particulate Matter (PM-10) Nonattainment Area/State/County Report. Available at: <http://www.epa.gov/oaqps001/greenbk/pnca.html>. Accessed March 5, 2013.
- . 2012c. Area Designations for 2006 24-Hour Fine Particle (PM_{2.5}) Standards. Available at: <http://www.epa.gov/pmdesignations/2006standards/documents/2009-10-08/map.htm>. Accessed March 5, 2013.
- U.S. Geological Survey (USGS). 2012. Mineral resources on-line spatial data – geologic maps of U.S. States. Available at: <http://tin.er.usgs.gov/geology/state>. Accessed March 4, 2013.
- The Weather Channel, LLC. 2013. Monthly averages for Flagstaff, Arizona. Available at: <http://www.weather.com/weather/wxclimatology/monthly/graph/USAZ0068>. Accessed March 5, 2013.

Appendix A

**BIOLOGICAL EVALUATION SPECIES LIST AND AZHGIS
ONLINE REVIEW TOOL**

METHODS

An SWCA biologist conducted a field reconnaissance of the project area on February 7, 2013. A U.S. Geological Survey 7.5-minute topographic map (Bellemont, Arizona) and maps provided by David Evans & Associates were used for general orientation and to locate the project area boundaries. The field reconnaissance consisted of a pedestrian survey of the project area to evaluate vegetation and landscape features considered important to the potential occurrence of special-status plant and animal species. Vegetation was classified to the community level according to the map “Biotic Communities of the Southwest” (Brown 1994).

Species Identification

The USFWS maintains a list of protected species and the critical habitat that is known to occur in each Arizona county. These species are currently listed as or are proposed for listing as endangered or threatened under the ESA (16 United States Code [USC] 1531 *et seq.*). The list also includes candidate species proposed as threatened or endangered, species delisted from protection under the ESA, and species delisted from protection under the ESA but currently proposed for relisting. The ESA specifically prohibits the “take” of a listed species. Take is defined as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to engage in any such conduct.” Some bird species also receive legal protection under the federal Migratory Bird Treaty Act (16 USC 703–712).

Only species listed by the USFWS are afforded protection under the ESA. The special-status species evaluated in this BE were based on the list of endangered, threatened, proposed endangered, and candidate species for Coconino County, Arizona, available at the USFWS website (USFWS 2013). The American peregrine falcon (*Falco peregrines anatum*) and bald eagle (*Haliaeetus leucocephalus*) have been delisted and no longer receive protection under the ESA; thus, these four species are not addressed in this EA. The USFWS species list is provided in the attachment below.

The AGFD maintains a statewide database, the Heritage Data Management System (HDMS), which tracks records for federally listed species and other species of special concern. SWCA accessed HDMS through the Arizona Heritage Geographic Information System (AZHGIS) online environmental review tool to determine whether any federally proposed or designated critical habitat or special-status species have been documented in or near the project area (AZHGIS 2013). The search results are included in Appendix B.

The potential for occurrence on the property of the species addressed in this EA was based on 1) documented records; 2) existing information on distribution; and 3) qualitative comparisons of the habitat requirements of each species with vegetation communities or landscape features in the project area.¹ Possible impacts to these species were evaluated based on reasonably foreseeable project-related activities.

¹ We agree with Hall et al. (1997) that habitat is organism specific and thus not synonymous with vegetation community. However, we have refined their definition to read as follows: habitat is an area in which some members of a species regularly occur continuously or seasonally. In the field, habitat is operationally defined by the presence or absence of a species. Areas that appear suitable for a species but that have not been surveyed are considered possible habitat. We avoid using the term *potential* with respect to habitat because potential is defined as ‘capable of becoming but not yet in existence’; *possible*, on the other hand, is defined as ‘of uncertain likelihood’. We also avoid using the terms “unoccupied habitat” or “suitable, but unoccupied habitat,” which represent a contradiction in terms.

Species Evaluation

The potential for occurrence of each species was summarized according to the categories listed below. Because not all species are accommodated precisely by a given category (i.e., category definitions may be too restrictive), an expanded rationale for each category assignment is provided. Potential for occurrence categories are as follows:

- *Known to occur*—the species has been documented in the project area by a reliable observer.
- *May occur*—the project area is within the species' currently known range, and vegetation communities, soils, etc., resemble those known to be used by the species.
- *Unlikely to occur*—the project area is within the species' currently known range, but vegetation communities, soils, etc., do not resemble those known to be used by the species, or the project area is clearly outside the species' currently known range.

Those species listed by the USFWS were assigned to one of three categories of possible effect, following USFWS recommendations. The effects determinations recommended by USFWS are as follows:

- *May affect, is likely to adversely affect*—the proposed project is likely to adversely affect a species if 1) the species occurs or may occur in the project site; and 2) any adverse effect on listed species may occur as a direct or indirect result of the proposed action or its interrelated or interdependent actions, and the effect is not discountable, insignificant, or beneficial. In the event that the overall effect of the proposed action is beneficial to the listed species but also is likely to cause some adverse effects, then the proposed action “is likely to adversely affect” the listed species.
- *May affect, is not likely to adversely affect*—the project is not likely to adversely affect a species if 1) the species may occur but its presence has not been documented and/or surveys following approved protocol have been conducted with negative results; and/or 2) project activity effects on a listed species are expected to be discountable, insignificant, or completely beneficial.
- **Beneficial effects** are contemporaneous positive effects without any adverse effects on the species. **Insignificant effects** relate to the size of the impact and should never reach the scale where take occurs. **Discountable effects** are those extremely unlikely to occur. Based on best judgment, a person would not 1) be able to meaningfully measure, detect, or evaluate insignificant effects; or 2) expect discountable effects to occur.
- *No effect*—the project will have no effect on a species if 1) it has no likelihood of effect on a listed species or its designated critical habitat (including effects that may be beneficial, insignificant, or discountable); or 2) the species' habitat does not occur in the project site.

Because species not listed as threatened or endangered are not protected under the authority of the ESA, impact determinations for these species do not follow the above USFWS recommendations. Instead, the impact determinations for any species listed as candidate or proposed endangered and not protected under the ESA are as follows:

- *No impact*—the project would have no impact on a species if 1) the species is considered unlikely to occur (range, vegetation, etc., are inappropriate); and 2) the species or its sign was not observed during surveys of the project area.
- *Beneficial impact*—the project is likely to benefit the species, whether it is currently present or not, by creating or enhancing habitat elements known to be used by the species.

- *May impact individuals but is not likely to result in a trend toward federal listing or loss of viability*—the project is not likely to adversely impact a species if 1) the species may occur but its presence has not been documented; and 2) project activities would not result in disturbance to areas or habitat elements known to be used by the species.
- *May impact individuals and is likely to result in a trend toward federal listing or loss of viability*—the project is likely to adversely impact a species if 1) the species is known to occur in the project area; and 2) project activities would disturb areas or habitat elements known to be used by the species, or would directly affect an individual.

RESULTS

Ecological Overview

The project area occurs in the Plains and Great Basin Grasslands and the Rocky Mountain and Madrean Montane Conifer Forests biotic communities. The elevation of the project is approximately 7,140 feet above mean sea level (amsl). The project area is bordered by the BNSF railway on the north. In the surrounding area, there are roads, railways and buildings associated with Camp Navajo on lands managed by the Arizona Army National Guard (AZ ARNG) and Arizona Department of Emergency and Military Affairs (DEMA). Interstate 40 is approximately ½ mile to the north.

Vegetation

The project area is primarily grasslands and the northern corner of the project area is ponderosa pine (*Pinus ponderosa*) forest. The vegetation in the grasslands includes rabbitbrush (*Ericameria* sp.), blue grama (*Bouteloua gracile*), mountain muhly (*Muhlenbergia montana*), prairie Junegrass (*Koeleria macranthra*), squirreltail (*Elymus* sp.), common mullein (*Verbascum thapsus*), and scattered ponderosa pine. In the northern corner of the project area is dominated by ponderosa pine.

Species Evaluation

None of the 22 species listed for Coconino County by USFWS are likely to occur in the project area (Table 1). The project area is clearly 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. Habitat requirements, potential for occurrence, and possible effects on these species are summarized in Table 1.

According to AZHGIS, the project area does not occur in or near any federally proposed or designated critical habitat, and there are no occurrence records for any ESA-listed species within 3 miles of the project area (AZHGIS 2013). According to AZHGIS, there are seven occurrence records for special-status species within 3 miles of the project area (AZHGIS 2013): northern goshawk (*Accipiter gentilis*), bald eagle-winter population (*Haliaeetus leucocephalus*), Navajo Mexican vole (*Microtus mexicanus navaho*), long-eared myotis (*Myotis evotis*), Arizona myotis (*Myotis occultus*), long-leagged myotis (*Myotis volans*), and cinder phacelia (*Phacelia serrata*). Additionally, the results indicated that this project area is within the designated 10J area (i.e., the designated area for the reintroduction and experimental population recovery efforts for the species) for California condor (*Gymnogyps californianus*). California condor is addressed in Table 1.

Table 1. Federally Listed Species Potentially Occurring in Coconino County, Arizona

Range or habitat information is from HDMS (2012); USFWS Arizona Ecological Services Field Office (USFWS 2012); *Arizona Rare Plant Field Guide* (Arizona Rare Plant Committee n.d.); and Corman and Wise-Gervais (2005).

Common Name (Species Name)	Status*	Range or Habitat Requirements	Potential for Occurrence in Project Area	Determination of Effect
Apache (Arizona) trout (<i>Oncorhynchus gilae apache</i>)	USFWS T	Found in small, cold, high-gradient streams on substrates that consist of boulders, rocks, and gravel with some sand or silt at elevations above 5,000 feet amsl in mixed-conifer forests and mountain meadows. Restricted to streams in the upper Salt, Gila, Blue, and Little Colorado drainages in the White Mountains on the White Mountain Apache Indian Reservation and the Apache-Sitgreaves National Forest. Populations introduced outside the historic range may still exist on the Coronado National Forest and the northern portion of the Kaibab National Forest.	Unlikely to occur. There are no streams areas in the project area.	No effect.
Arizona bugbane (<i>Cimicifuga arizonica</i>)	USFWS CA	Found in moist, loamy soil in riparian deciduous forest at elevations between 4,800 and 6,900 feet amsl. Its range includes Bill Williams Mountain; North Canyon, Kaibab Plateau; West Fork and other tributaries of Oak Creek; West Clear Creek and tributaries; and Workman Creek and Cold Springs Canyon in the Sierra Ancha Mountains.	Unlikely to occur. There are riparian deciduous forests in the project area.	No effect.
Black-footed ferret (<i>Mustela nigripes</i>)	USFWS E	Found on grassland plains in mountain basins at elevations below 10,500 feet amsl, usually in association with prairie dogs, which serve as a primary source of food and burrows. Only reintroduced populations are known to exist in the wild. In Arizona, they occur only in Aubrey Valley in Coconino County.	Unlikely to occur. No wild populations are currently known to exist in Arizona.	No effect.
Brady pincushion cactus (<i>Pediocactus bradyi</i>)	USFWS E	Found at elevations between 3,340 and 5,200 feet amsl on Kaibab limestone flakes overlying soils derived from the Moenkopi Formation. Known only from the vicinity of Marble Canyon.	Unlikely to occur. The project area is above the elevational range and outside the known geographic range of this species.	No effect.
California condor (<i>Gymnogyps californianus</i>)	USFWS E	Nesting sites are in caves, crevices, and potholes in isolated regions of the Southwest. USFWS began reintroducing an experimental, nonessential population of California condors into northern Arizona and southern Utah in 1996. On November 5, 2003, a pair successfully fledged one nestling from a cave at Grand Canyon, becoming the first California condor to be successfully hatched and reared in the wild since 1984.	Unlikely to occur. Although the project area is located in the southern portion of the 10J area (i.e., the non-essential experimental population area), there are no cliffs or other suitable nesting sites within the project area, and individuals of this species currently only reside in the Vermilion Cliffs area.	No effect.
Chiricahua leopard frog (<i>Lithobates chiricahuensis</i>)	USFWS T	Restricted to springs, livestock tanks, and streams in the upper portions of watersheds at elevations between 3,281 and 8,890 feet amsl in central, east-central, and southeastern Arizona. Populations in central and east-central Arizona are disjunct from those in southeastern Arizona and may be distinct species.	Unlikely to occur. The project area is outside the known geographic range of this species.	No effect.

Table 1. Federally Listed Species Potentially Occurring in Coconino County, Arizona (Continued)

Range or habitat information is from HDMS (2012); USFWS Arizona Ecological Services Field Office (USFWS 2012); *Arizona Rare Plant Field Guide* (Arizona Rare Plant Committee n.d.); and Corman and Wise-Gervais (2005).

Common Name (Species Name)	Status*	Range or Habitat Requirements	Potential for Occurrence in Project Area	Determination of Effect
Fickeisen plains cactus (<i>Pediocactus peeblesianus</i> var. <i>fickeiseniae</i>)	USFWS PE	Occurs on gravelly limestone or gravelly loam in desertscrub at elevations between 4,300 and 5,450 feet amsl. Known only from the vicinity of Gray Mountain in Coconino County and north and west to the Arizona Strip in Coconino and Mohave Counties. May also occur near Joseph City in Navajo County.	Unlikely to occur. The project area is above the elevational range and outside the known geographic range of this species.	No effect.
Humpback chub (<i>Gila cypha</i>)	USFWS E	Occurs at elevations generally below 4,000 feet in a variety of riverine habitats, especially canyon areas with fast currents, deep pools, and boulder habitat. In Arizona, it occurs in the Grand and Marble Canyon portions of the main stem Colorado and lower Little Colorado Rivers.	Unlikely to occur. There are no riverine habitats in the project area.	No effect.
Kanab ambersnail (<i>Oxyloma haydeni kanabensis</i>)	USFWS E	Found at an elevation of approximately 2,900 feet amsl in semi-aquatic vegetation watered by springs or seeps at the base of sandstone or limestone cliffs. In Arizona, occurs at one location in upper Grand Canyon National Park.	Unlikely to occur. The project area is above the elevational range and outside the known geographic range of this species.	No effect.
Little Colorado spinedace (<i>Lepidomeda vittata</i>)	USFWS T	Inhabits small to medium-sized streams, where it is characteristically found in pools with fine gravel and silt-mud substrates at elevations between 4,000 and 8,000 feet amsl. Occurs in East Clear Creek and its tributaries (Coconino County); Chevelon and Silver Creeks (Navajo County); and Nutrioso Creek and the Little Colorado River (Apache County).	Unlikely to occur. There are no streams in the project area.	No effect.
Mexican spotted owl (<i>Strix occidentalis lucida</i>)	USFWS T	Found in mature montane forests and woodlands and steep, shady, wooded canyons. Can also be found in mixed-conifer and pine-oak vegetation types. Generally nests in older forests of mixed conifers or ponderosa pine (<i>Pinus ponderosa</i>)–Gambel oak (<i>Quercus gambelii</i>). Nests in live trees on natural platforms (e.g., dwarf mistletoe [<i>Arceuthobium</i> spp.] brooms), snags, and canyon walls at elevations between 4,100 and 9,000 feet amsl.	Unlikely to occur. The project area does not contain mixed-conifer or extensive pine-oak vegetation types.	No effect.
Navajo sedge (<i>Carex specuicola</i>)	USFWS T	Found in seeps and hanging gardens on vertical Navajo sandstone cliffs and alcoves at elevations between 4,400 and 7,000 feet amsl. In Arizona, its range includes the Navajo Creek drainage east to the Rock Point–Mexican Water area.	Unlikely to occur. There are no seeps or gardens in the project area.	No effect.

Table 1. Federally Listed Species Potentially Occurring in Coconino County, Arizona (Continued)

Range or habitat information is from HDMS (2012); USFWS Arizona Ecological Services Field Office (USFWS 2012); *Arizona Rare Plant Field Guide* (Arizona Rare Plant Committee n.d.); and Corman and Wise-Gervais (2005).

Common Name (Species Name)	Status*	Range or Habitat Requirements	Potential for Occurrence in Project Area	Determination of Effect
Northern Mexican gartersnake (<i>Thamnophis eques megalops</i>)	USFWS C	This species is most abundant at elevations between 3,000 and 5,000 feet amsl in densely vegetated habitat surrounding cienegas, streams, and stock tanks, in or near water along streams in valley floors and generally open areas but not in steep mountain canyon stream habitat (Rosen and Schwalbe 1988). Considered extant in fragmented populations within the middle to upper Verde River drainage, middle to lower Tonto Creek, Cienega Creek, and a small number of isolated wetland habitats elsewhere in southeastern Arizona.	Unlikely to occur. The project area is does not contain suitable habitat and is outside the known geographic range of this species.	No effect.
Paradine (Kaibab) plains cactus (<i>Pediocactus paradinei</i>)	USFWS CA	Found in gravelly Kaibab limestone soils associated with blue grama (<i>Bouteloua gracilis</i>) grass in transition areas between woodland and sagebrush at elevations between 5,000 and 7,000 feet amsl. Occurs on the east side of the Kaibab Plateau and in small areas in the adjacent House Rock and Coyote Valleys.	Unlikely to occur. The project area is outside the known geographic range of this species.	No effect.
Razorback sucker (<i>Xyrauchen texanus</i>)	USFWS E	Found in backwaters, flooded bottomlands, pools, side channels, and other slower-moving habitats at elevations below 6,000 feet amsl. In Arizona, populations are restricted to Lakes Mohave and Mead and the lower Colorado River below Havasu in the Lower Basin. In the Upper Basin, small remnant populations are found in the Green, Yampa, and main stem Colorado Rivers.	Unlikely to occur. There are no rivers or streams in the project area.	No effect.
Roundtail chub (<i>Gila robusta</i>)	USFWS C	Found in cool to warm water, mid-elevation streams and rivers with pools adjacent to swifter riffles and runs. In Arizona, this fish occurs at elevations between 1,210 and 7,220 feet amsl in two tributaries of the Little Colorado River, several tributaries of the Bill Williams River basin, the Salt River and four of its tributaries, the Verde River and five of its tributaries, Aravaipa Creek, and Eagle Creek.	Unlikely to occur. There are no rivers or streams in the project area.	No effect.
San Francisco Peaks groundsel (<i>Senecio franciscanus</i>)	USFWS T	Found on gravelly sandy loams of talus in alpine fell fields at elevations between 11,000 and 12,400 feet amsl. Known only from the San Francisco Peaks.	Unlikely to occur. The project area is below the elevational range and outside the known geographic range of this species.	No effect.
Sentry milk vetch (<i>Astragalus cremnohylax</i> var. <i>cremnohylax</i>)	USFWS E	Found in crevices and depressions with shallow soils on Kaibab limestone on rim rock benches at the canyon edge in piñon-juniper woodlands at elevations between 7,050 and 7,960 feet amsl. Known only from Grand Canyon National Park.	Unlikely to occur. The project area is does not contain suitable habitat and is outside the known geographic range of this species.	No effect.
Siler pincushion cactus (<i>Pediocactus sileri</i>)	USFWS T	Found in red or gray gypsiferous badlands derived from the Moenkopi Formation at elevations between 2,800 and 5,400 feet amsl. In Arizona, occurs at Fort Pierce, Lost Spring Mountain, and Yellowstone and Shinarump Mesas.	Unlikely to occur. The project area is above the elevational range and outside the known geographic range of this species.	No effect.

Table 1. Federally Listed Species Potentially Occurring in Coconino County, Arizona (Continued)

Range or habitat information is from HDMS (2012); USFWS Arizona Ecological Services Field Office (USFWS 2012); *Arizona Rare Plant Field Guide* (Arizona Rare Plant Committee n.d.); and Corman and Wise-Gervais (2005).

Common Name (Species Name)	Status*	Range or Habitat Requirements	Potential for Occurrence in Project Area	Determination of Effect
Southwestern willow flycatcher (<i>Empidonax traillii extimus</i>)	USFWS E	Found in dense riparian habitats along streams, rivers, and other wetlands where cottonwood (<i>Populus</i> spp.), willow (<i>Salix</i> spp.), boxelder (<i>Acer negundo</i>), saltcedar (<i>Tamarix</i> spp.), Russian olive (<i>Elaeagnus angustifolia</i>), buttonbush (<i>Cephalanthus</i> spp.), and arrowweed (<i>Pluchea sericea</i>) are present. Nests are found in thickets of trees and shrubs, primarily those that are 13 to 23 feet tall, among dense, homogeneous foliage. Habitat occurs at elevations below 8,500 feet amsl.	Unlikely to occur. There is no riparian vegetation in the project area.	No effect.
Welsh's milkweed (<i>Asclepias welshii</i>)	USFWS T	Found on active sand dunes in Great Basin desertscrub at elevations between 4,700 and 6,250 feet amsl. In Arizona, small populations are known from the vicinity of Page and the Paria Wilderness.	Unlikely to occur. There are no sand dunes in the project area. The project area is above the elevational range and outside the geographic range of this species.	No effect.
Yellow-billed cuckoo (<i>Coccyzus americanus</i>)	USFWS C	Typically found in riparian woodland vegetation (cottonwood, willow, or saltcedar) at elevations below 6,600 feet amsl. Dense understory foliage appears to be an important factor in nest site selection. The highest concentrations in Arizona are along the Agua Fria, San Pedro, upper Santa Cruz, and Verde River drainages and Cienega and Sonoita Creeks.	Unlikely to occur. There is no riparian vegetation in the project area.	No effect.

***USFWS Status Definitions**

C = Candidate. Candidate species are those for which USFWS has sufficient information on biological vulnerability and threats to support proposals to list as endangered or threatened under the ESA. However, proposed rules have not yet been issued because such actions are precluded at present by other listing activity.

CA = Conservation Agreement. A conservation agreement is an agreement between the USFWS and other federal, state, or local agencies or private landowners to take certain steps to ensure the protection of the species.

E = Endangered. Endangered species are those in imminent jeopardy of extinction. The ESA specifically prohibits the take of a species listed as endangered. Take is defined by the ESA as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to engage in any such conduct.

PE = Proposed Endangered. Proposed endangered species are those that are not currently federally protected under the ESA but are eligible to be listed as endangered under the ESA.

T = Threatened. Threatened species are those in imminent jeopardy of becoming endangered. The ESA prohibits the take of a species listed as threatened under Section 4d of the ESA. Take is defined by the ESA as to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to engage in any such conduct.

LITERATURE CITED

- Arizona Heritage Geographic Information System (AZHGIS). 2013. Arizona Game and Fish Department online environmental review tool. Available at: <http://www.azgfd.gov/hgis>. Accessed February 7, 2013.
- Arizona Rare Plant Committee. n.d. [2001]. *Arizona Rare Plant Field Guide*. Washington, D.C.: U.S. Government Printing Office.
- Brown, D.E. (ed.). 1994. *Biotic Communities: Southwestern United States and Northwestern Mexico*. Salt Lake City: University of Utah Press.
- Corman, T.E., and C. Wise-Gervais. 2005. *Arizona Breeding Bird Atlas*. Albuquerque: University of New Mexico Press.
- Hall, L.S., P.R. Krausman, and M.L. Morrison. 1997. The habitat concept and a plea for standard terminology. *Wilson Society Bulletin* 25:173–182.
- Heritage Data Management System (HDMS). 2013. Arizona Game and Fish Department species of concern list. Available at: http://www.azgfd.gov/w_c/edits/species_concern.shtml. Accessed February 7, 2013.
- U.S. Fish and Wildlife Service (USFWS). 2013. List of threatened and endangered species. Available at: <http://www.fws.gov/southwest/es/arizona/Threatened.htm#CountyList>. Accessed February 7, 2013.

Arizona's On-line Environmental Review Tool

Search ID: 20130207019581
 Project Name: Camp Navajo Cemetery
 Date: 2/7/2013 2:17:08 PM

Project Location



Project Name: Camp Navajo Cemetery
 Submitted By: Lara Dickson
 On behalf of: CONSULTING
 Project Search ID: 20130207019581
 Date: 2/7/2013 2:17:03 PM
 Project Category: Military Activities, Development (new buildings, roads, etc.)
 Project Coordinates (UTM Zone 12-NAD 83): 422676.431, 3899770.043
 meter
 Project Area: 65.102 acres
 Project Perimeter: 2118.272 meter
 County: COCONINO
 USGS 7.5 Minute Quadrangle ID: 678
 Quadrangle Name: BELLEMONT
 Project locality is currently being scoped

The Department appreciates the opportunity to provide in-depth comments and project review when additional information or environmental documentation becomes available.

Special Status Species Occurrences/Critical Habitat/Tribal Lands within 3 miles of Project Vicinity:

Name	Common Name	FWS	USFS	BLM	State
Accipiter gentilis	Northern Goshawk	SC	S	S	WASC
Gymnogyps californianus	10J area for California condor				
Haliaeetus leucocephalus (wintering pop.)	Bald Eagle - Winter Population	SC,BG A	S	S	WASC
Microtus mexicanus navaho	Navajo Mexican Vole	SC	S		WASC
Myotis evotis	Long-eared Myotis	SC			
Myotis occultus	Arizona Myotis	SC		S	
Myotis volans	Long-legged Myotis	SC			
Phacelia serrata	Cinder Phacelia	SC			

Location Accuracy Disclaimer

Project locations are assumed to be both precise and accurate for the purposes of environmental review. The creator/owner of the Project Review Receipt is solely responsible for the project location and thus the correctness of the Project Review Receipt content.

Page 1 of 6 APPLICATION INITIALS: _____

Arizona's On-line Environmental Review Tool

Search ID: 20130207019581

Project Name: Camp Navajo Cemetery

Date: 2/7/2013 2:17:08 PM

Please review the entire receipt for project type recommendations and/or species or location information and retain a copy for future reference. If any of the information you provided did not accurately reflect this project, or if project plans change, another review should be conducted, as this determination may not be valid.

Arizona's On-line Environmental Review Tool:

1. This On-line Environmental Review Tool inquiry has generated recommendations regarding the potential impacts of your project on Special Status Species (SSS) and other wildlife of Arizona. SSS include all U.S. Fish and Wildlife Service federally listed, U.S. Bureau of Land Management sensitive, U.S. Forest Service sensitive, and Arizona Game and Fish Department (Department) recognized species of concern.
2. These recommendations have been made by the Department, under authority of Arizona Revised Statutes Title 5 (Amusements and Sports), 17 (Game and Fish), and 28 (Transportation). These recommendations are preliminary in scope, designed to provide early considerations for all species of wildlife, pertinent to the project type you entered.
3. This receipt, generated by the automated On-line Environmental Review Tool does not constitute an official project review by Department biologists and planners. Further coordination may be necessary as appropriate under the National Environmental Policy Act (NEPA) and/or the Endangered Species Act (ESA).

The U.S. Fish and Wildlife Service (USFWS) has regulatory authority over all federally listed species under the ESA. Contact USFWS Ecological Services Offices: <http://arizonaes.fws.gov/>.

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Fax 928-226-1099

Disclaimer:

1. This is a preliminary environmental screening tool. It is not a substitute for the potential knowledge gained by having a biologist conduct a field survey of the project area.
2. The Department's Heritage Data Management System (HDMS) data is not intended to include potential distribution of special status species. Arizona is large and diverse with plants, animals, and environmental conditions that are ever changing. Consequently, many areas may contain species that biologists do not know about or species previously noted in a particular area may no longer occur there.
3. Not all of Arizona has been surveyed for special status species, and surveys that have been conducted have varied greatly in scope and intensity. Such surveys may reveal previously undocumented population of species of special concern.
4. HDMS data contains information about species occurrences that have actually been reported to the Department.

Arizona Game and Fish Department Mission

To conserve, enhance, and restore Arizona's diverse wildlife resources and habitats through aggressive protection and

Arizona's On-line Environmental Review Tool

Search ID: 20130207019581

Project Name: Camp Navajo Cemetery

Date: 2/7/2013 2:17:08 PM

management programs, and to provide wildlife resources and safe watercraft and off-highway vehicle recreation for the enjoyment, appreciation, and use by present and future generations.

Project Category: Military Activities, Development (new buildings, roads, etc.)

Project Type Recommendations:

All degraded and disturbed lands should be restored to their natural state. Vegetation restoration projects (including treatments of invasive or exotic species) should have a completed site-evaluation plan (identifying environmental conditions necessary to re-establish native vegetation), a revegetation plan (species, density, method of establishment), a short and long-term monitoring plan, including adaptive management guidelines to address needs for replacement vegetation.

Based on the project type entered; coordination with State Historic Preservation Office may be required
<http://azstateparks.com/SHPO/index.html>

Consider designs and tower modifications that reduce or eliminate impacts to migratory birds. Please refer to the U.S. Fish and Wildlife Service's page on cellular towers in Arizona
<http://www.fws.gov/arizonaes/CellTower.htm>. On this page there are guidelines for tower siting, construction, operation, and decommissioning. Also see the Service's Interim Guidelines for Recommendations on Communications Tower Siting, Construction, Operation, and Decommissioning.
<http://www.fws.gov/habitatconservation/communicationtowers.htm>.

During planning and construction, minimize potential introduction or spread of exotic invasive species. Invasive species can be plants, animals (exotic snails), and other organisms (e.g. microbes), which may cause alteration to ecological functions or compete with or prey upon native species and can cause social impacts (e.g. livestock forage reduction, increase wildfire risk). The terms noxious weed or invasive plants are often used interchangeably. Precautions should be taken to wash all equipment utilized in the project activities before and after project activities to reduce the spread of invasive species. Arizona has noxious weed regulations (Arizona Revised Statutes, Rules R3-4-244 and R3-4-245). See Arizona Department of Agriculture website for restricted plants

<http://www.azda.gov/PSD/quarantine5.htm>. Additionally, the U.S. Department of Agriculture has information regarding pest and invasive plant control methods including: pesticide, herbicide, biological control agents, and mechanical control:
<http://www.usda.gov/wps/portal/usdahome>. The Department regulates the importation, purchasing, and transportation of wildlife and fish (Restricted Live Wildlife), please refer to the hunting regulations for further information http://www.azgfd.gov/hunting_rules.shtml.

During the planning stages of your project, please consider the local or regional needs of wildlife in regards to movement, connectivity, and access to habitat needs. Loss of this permeability prevents wildlife from accessing resources, finding mates, reduces gene flow, prevents wildlife from re-colonizing areas where local extirpations may have occurred, and ultimately prevents wildlife from contributing to ecosystem functions, such as pollination, seed dispersal, control of prey numbers, and resistance to invasive species. In many cases, streams and washes provide natural movement corridors for wildlife and should be maintained in their natural state. Uplands also support a large diversity of species, and should be contained within important wildlife movement corridors. In addition, maintaining biodiversity and ecosystem functions can be facilitated through improving designs of structures, fences, roadways, and culverts to promote passage for a

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variety of wildlife.

Minimization and mitigation of impacts to wildlife and fish species due to changes in water quality, quantity, chemistry, temperature, and alteration to flow regimes (timing, magnitude, duration, and frequency of floods) should be evaluated. Minimize impacts to springs, in-stream flow, and consider irrigation improvements to decrease water use. If dredging is a project component, consider timing of the project in order to minimize impacts to spawning fish and other aquatic species (including spawning seasons), and to reduce spread of exotic invasive species. We recommend early direct coordination with Project Evaluation Program for projects that could impact water resources, wetlands, streams, springs, and/or riparian habitats.

Planning: consider impacts of lighting intensity on mammals and birds and develop measures or alternatives that can be taken to increase human safety while minimizing potential impacts to wildlife. Conduct wildlife surveys to determine species within project area, and evaluate proposed activities based on species biology and natural history to determine if artificial lighting may disrupt behavior patterns or habitat use.

Recommendations will be dependant upon goals of the fence project and the wildlife species expected to be impacted by the project. General guidelines for ensuring wildlife-friendly fences include: barbless wire on the top and bottom with the maximum fence height 42", minimum height for bottom 16". Modifications to this design may be considered for fencing anticipated to be routinely encountered by elk, bighorn sheep or pronghorn (e.g., Pronghorn fencing would require 18" minimum height on the bottom). Please refer to the Department's Fencing Guidelines located at <http://www.azgfd.gov/hgis/guidelines.aspx>.

The Department recommends that wildlife surveys are conducted to determine if noise-sensitive species occur within the project area. Avoidance or minimization measures could include conducting project

activities outside of breeding seasons.

Project Location and/or Species recommendations:

Heritage Data Management System records indicate that one or more listed, proposed, or candidate species or Critical Habitat (Designated or Proposed) have been documented in the vicinity of your project (refer to page 1 of the receipt). Please contact:

Ecological Services Office
US Fish and Wildlife Service
2321 W. Royal Palm Rd.
Phoenix, AZ 85021-4951
Phone: 602-242-0210
Fax: 602-242-2513

Recommendations Disclaimer:

1. Potential impacts to fish and wildlife resources may be minimized or avoided by the recommendations generated from information submitted for your proposed project.
2. These recommendations are proposed actions or guidelines to be considered during **preliminary project development**.
3. Additional site specific recommendations may be proposed during further NEPA/ESA analysis or through coordination with affected agencies.
4. Making this information directly available does not substitute for the Department's review of project proposals, and should not decrease our opportunity to review and evaluate additional project information and/or new project proposals.
5. The Department is interested in the conservation of all fish and wildlife resources, including those Special Status Species listed on this receipt, and those that may have not been documented within the project vicinity as well as other game and nongame wildlife.

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6. Further coordination requires the submittal of this initialed and signed Environmental Review Receipt with a cover letter and project plans or documentation that includes project narrative, acreage to be impacted, how construction or project activity(s) are to be accomplished, and project locality information (including site map).

7. Upon receiving information by AZGFD, please allow 30 days for completion of project reviews. Mail requests to:

**Project Evaluation Program, Habitat Branch
Arizona Game and Fish Department
5000 West Carefree Highway
Phoenix, Arizona 85086-5000
Phone Number: (623) 236-7600
Fax Number: (623) 236-7366**

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1. This Environmental Review and project planning website was developed and intended for the purpose of screening projects for potential impacts on resources of special concern. By indicating your agreement to the terms of use for this website, you warrant that you will not use this website for any other purpose.
2. Unauthorized attempts to upload information or change information on this website are strictly prohibited and may be punishable under the Computer Fraud and Abuse Act of 1986 and/or the National Information Infrastructure Protection Act.
3. The Department reserves the right at any time, without notice, to enhance, modify, alter, or suspend the website and to terminate or

restrict your access to the website.
4. This Environmental Review is based on the project study area that was entered. The review must be redone if the project study area, location, or the type of project changes. If additional information becomes available, this review may need to be reconsidered.
5. A signed and initialed copy of the Environmental Review Receipt indicates that the entire receipt has been read by the signer of the Environmental Review Receipt.

Security:

The Environmental Review and project planning web application operates on a complex State computer system. This system is monitored to ensure proper operation, to verify the functioning of applicable security features, and for other like purposes. Anyone using this system expressly consents to such monitoring and is advised that if such monitoring reveals possible evidence of criminal activity, system personnel may provide the evidence of such monitoring to law enforcement officials. Unauthorized attempts to upload or change information; to defeat or circumvent security measures; or to utilize this system for other than its intended purposes are prohibited.

This website maintains a record of each environmental review search result as well as all contact information. This information is maintained for internal tracking purposes. Information collected in this application will not be shared outside of the purposes of the Department.

If the Environmental Review Receipt and supporting material are not mailed to the Department or other appropriate agencies within six (6) months of the Project Review Receipt date, the receipt is considered to be null and void, and a new review must be initiated.

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Project Name: Camp Navajo Cemetery

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Print this Environmental Review Receipt using your internet browser's print function and keep it for your records. Signature of this receipt indicates the signer has read and understands the information provided.

Signature: _____

Date: _____

Proposed Date of Implementation: _____

Please provide point of contact information regarding this Environmental Review.

Application or organization responsible for project implementation

Agency/organization: _____

Contact Name: _____

Address: _____

City, State, Zip: _____

Phone: _____

E-mail: _____

Person Conducting Search (if not applicant)

Agency/organization: _____

Contact Name: _____

Address: _____

City, State, Zip: _____

Phone: _____

E-mail: _____

Appendix B

SHPO CONCURRENCE LETTER

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Janice K. Brewer
Governor

Bryan Martyn
Executive Director



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Board Members

Walter D. Armer, Jr., Vail, *Chair*
 Maria Baier, State Land Commissioner, *Vice Chair*
 Alan Everett, Sedona
 Larry Landry, Phoenix
 William C. Scalzo, Phoenix
 Tracey Westerhausen, Phoenix
 Reese Woodling, Tucson

May 11, 2012

Homer Rodgers, Assistant Deputy Director
 Arizona Department of Veteran's Affairs
 3839 North 3rd Street, Suite 200
 Phoenix, AZ 85012

RE: Northern Arizona Veteran's Memorial Cemetery, Bellemont
 Section 106 Consultation
 SHPO-2012-0366 (101240)

Peter-

Thank you for providing the Arizona State Historic Preservation Office pursuant to the implementation of Section 106 of the National Historic Preservation Act with a copy of **Camp Navajo: A Cultural Resources Survey of Approximately 25,000 Acres of the Western Mogollon Rim at Bellemont, Coconino County, Arizona**, a survey conducted in 2008 by SWCA Environmental Consultants. We have reviewed the submitted materials, and offer the following comments.

The sixty acres needed for the development of the new veteran's cemetery at Camp Navajo does not involve any of the cultural resources identified in the 2008 SWCA report. It is assumed that construction activities, including staging areas and temporary easements, are limited to these sixty acres. Given the absence of significant archaeological deposits on the 60-acre parcel in question, a determination of "**no historic properties affected**" is appropriate for construction of a new Veteran's Memorial Cemetery on Camp Navajo at Bellemont.

Our office appreciates your cooperation in complying with federal historic preservation requirements. If you have any questions or concerns, please feel free to contact me at 602-542-7140 or djacobs@azstateparks.gov.

Sincerely,

David Jacobs
 Archaeologist/Compliance Specialist
 Arizona State Historic Preservation Office

CC: Peter Pagoulatos, Arizona Army National Guard

Appendix C

PUBLIC SCOPING LETTER, NOTICE, AND COMMENTS

