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14. ABSTRACT The City of West Wendover, Nevada proposes to construct a new public works facility on land owned by Hill Air Force Base. The findings of this EA indicate that the proposed action would not have significant adverse effects on the human environment or any of the environmental resources as described in the EA. Therefore, it is concluded that a Finding of No Significant Impact is justified.
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City of West Wendover, Nevada

Final

**Environmental Assessment:
Proposed Public Works Facility**

August 11, 2010

Final

**Environmental Assessment (EA):
Proposed Public Works Facility,
City of West Wendover, Nevada**

Prepared For:

**City of West Wendover
801 Alpine Street
West Wendover, Nevada 89883**

August 11, 2010

Prepared in accordance with the Department of the Air Force Environmental Impact Analysis Process (EIAP) 32 CFR Part 989, Effective July 6, 1999, which implements the National Environmental Policy Act (NEPA), the President's Council on Environmental Quality (CEQ) regulations.

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LIST OF ACRONYMS AND ABBREVIATED TERMS

AFB	Air Force Base
APE	Area of Potential Effect
bgs	Below the Ground Surface
BLM	Bureau of Land Management (United States)
BTU	British Thermal Unit
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CWA	Clean Water Act
EA	Environmental Assessment
EIAP	Environmental Impact Analysis Process
EIS	Environmental Impact Statement
EPA	Environmental Protection Agency (United States)
FONSI	Finding of No Significant Impact
FQI	Floristic Quality Index
ft ²	Square Feet
HAP	Hazardous Air Pollutant
HCl	Hydrogen Chloride
IRP	Installation Restoration Program
lb	pound
mg	milligram
NAAQS	National Ambient Air Quality Standards
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NO ₂	Nitrogen Dioxide
NO _x	Oxides of Nitrogen
O ₃	Ozone
OSHA	Occupational Safety and Health Administration
PCB	Polychlorinated Biphenyl
PM-10	Particulates Smaller Than 10 Microns in Diameter
PM-2.5	Particulates Smaller Than 2.5 Microns in Diameter

RCRA	Resource Conservation and Recovery Act
RHI	Range Land Health Index
ROD	Record of Decision
SDWA	Solid Waste Disposal Act
SHPO	State Historic Preservation Office (Nevada)
SO ₂	Sulfur Dioxide
SO _x	Oxides of Sulfur
SPCC	Spill Prevention Control and Countermeasure Plan
SR	State Route
T/E	Threatened/Endangered
µm	micrometer, or micron
US	United States
USAF	United States Air Force
UTTR	Utah Test and Training Range
VOC	Volatile Organic Compound
WCI	Wildlife Community Index

1 PURPOSE OF AND NEED FOR ACTION

1.1 Introduction

The City of West Wendover, Nevada (city) is located immediately west of the Utah-Nevada border, 120 miles west of Salt Lake City, Utah and 400 miles east of Reno, Nevada, along Interstate Highway 80 (Figure 1). In 2007, the city had a population of 4,958 residents, with an annual growth rate of about two percent (Hardcastle 2007).



Figure 1: West Wendover, Nevada Location Map

The city currently owns and operates a public works facility occupied by approximately 13 city employees for office space, vehicle and equipment maintenance, and storage space for vehicles, equipment, and materials related to operation and maintenance of public water, sewer, road, trail, and garbage collection systems. City employees maintain a fleet of approximately 40 passenger cars and pickup trucks, plus approximately 25 pieces of heavier equipment such as fire trucks, dump trucks, and earthmoving equipment.

This facility is located at 1875 Florence Way in West Wendover (Figure 2), on a 2.67 acre parcel with the office and maintenance structures comprising approximately 4,000 square feet (ft²).

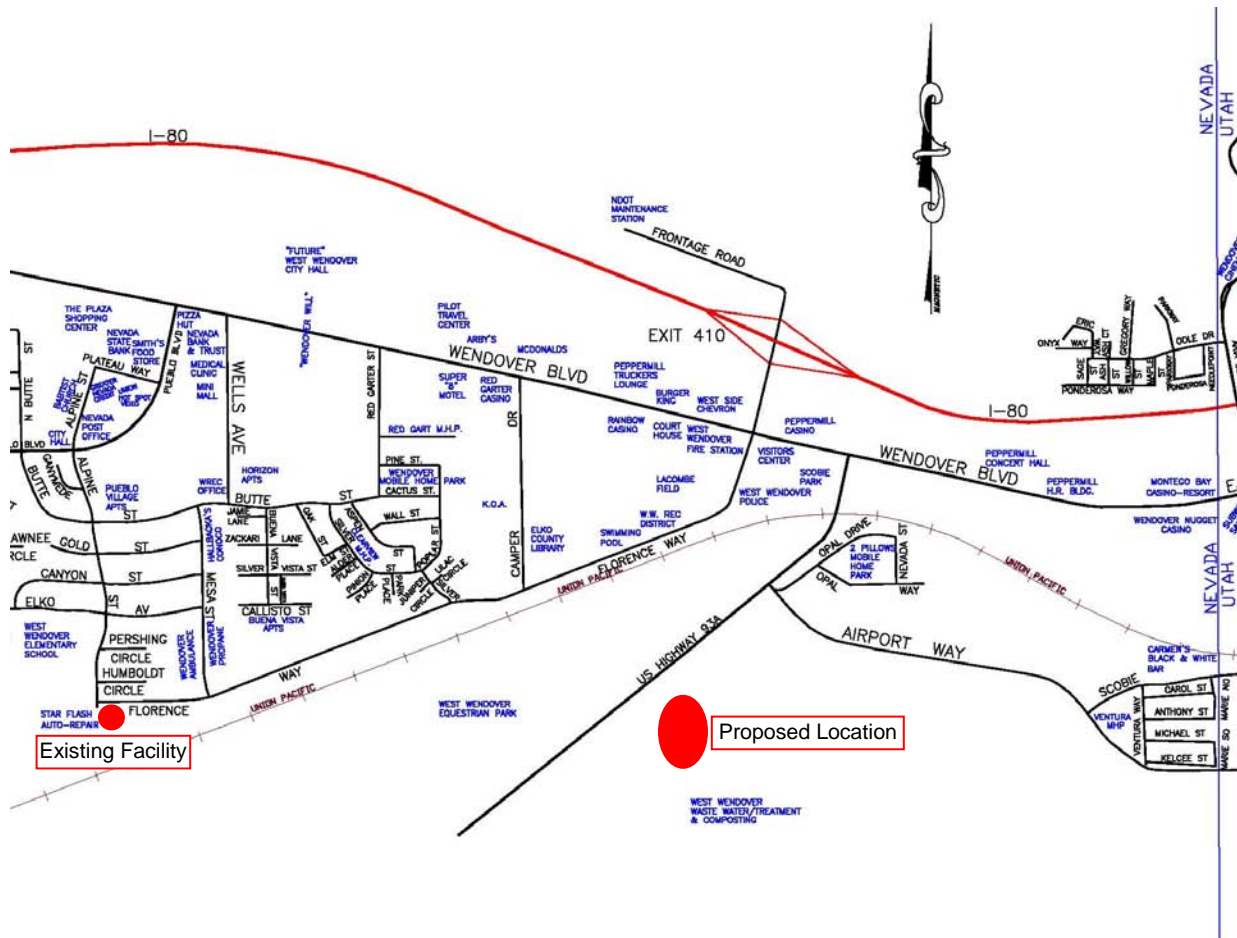


Figure 2: Locations of the Alternatives Considered in Detail

The city proposes to construct a new public works facility on the south side of Nevada State Route (SR) Highway 93A, and north of the existing wastewater treatment plant and composting facility (Figure 2). The proposed action would be located on land owned by Hill Air Force Base (AFB).

1.2 Purpose of the Action

The purpose of the proposed action is to provide an adequately sized public works facility for the City of West Wendover. The main structure would contain offices and a vehicle and equipment maintenance facility. The yard would provide fenced storage space for vehicles, equipment, and materials related to operation and maintenance of public water, sewer, road, trail, and garbage collection systems. Within the next five years, the city plans to construct additional sheds to provide covered storage for equipment and materials.

Additional details regarding the proposed action and alternatives to the proposed action are presented in Section 2.2 of this document.

1.3 Need for the Action

The proposed action is needed to provide adequate space for the City of West Wendover’s public works department to conduct administrative activities, maintain vehicles, and store equipment and materials necessary for the operation of city-provided services including water, sewer, road, trail, and garbage collection systems. Historic and anticipated city population growth of two percent per year has resulted in a public works facility that is outdated and lacks sufficient space for public works employees to efficiently complete their assigned operational and administrative duties. If an adequately sized facility is not provided, the city could become limited in its ability to maintain equipment required for the safe operation of public services.

Table 1 compares the features of the existing facility to features that would be provided by the proposed facility.

Feature	Existing Facility	Proposed Facility
Maintenance Shop	3,800 ft ²	4,500 ft ²
Office and Break Room	350 ft ²	474 ft ²
Covered Storage	850 ft ²	13,500 ft ²
Open Area Storage	2.56 acres	4.35 acres
Vehicle Wash	800 ft ²	800 ft ²
Truck Weighing Scale	none	1,200 ft ²
Oil-Water Separator	none	buried
Total Area	2.67 acres	6.42 acres

Table 1: Features of the Existing and Proposed Facilities

1.4 Alternative Selection Criteria

Due to the considerations presented in the preceding sections, the following selection criteria were established. The facility that accommodates the city functions described in this document should:

- have sufficient space (minimum five acres) to house all of the necessary equipment and workers (as stated for the proposed facility in Table 1);
- be located within one mile of the center of town, City of West Wendover;

- exhibit slope under five percent, utilities within 2,000 feet, and access to SR 93A within 1,000 feet; and
- be legally available for the intended use (not prohibited by law, zoning, or other legal agreement).

Using these selection criteria, Section 2 presents the alternatives that were developed, compares four alternatives for their ability to achieve the project objectives, and for the alternatives considered in detail, summarizes their expected effects.

1.5 Relevant Plans, Laws, Regulations, and Other Documents

During the scoping process, no relevant plans, environmental impact statements (EISs), or environmental assessments (EAs) were identified.

The following federal, state, and local laws, regulations, and permits would apply to the proposed action:

- The National Environmental Policy Act (NEPA), Title 42 of the United States Code (USC) Section 4321 *et seq.*
- Council on Environmental Quality regulations, Title 40 of the Code of Federal Regulations (CFR) Parts 1500-1508.
- United States (US) Air Force (USAF)-specific requirements contained in Title 32 of the Code of Federal Regulations (CFR) Part 989, Environmental Impact Analysis Process (EIAP).
- The Clean Air Act (CAA), 42 USC Section 7401 *et seq.*
- Determining Conformity of Federal Actions to State or Federal Implementation Plans, 40 CFR Part 93.154.
- Standards for the Management of Used Oil, On-site Burning in Space Heaters, 40 CFR Part 279.23.
- The National Historic Preservation Act (NHPA), 16 USC Section 470 *et seq.*
- The Clean Water Act (CWA), 33 USC Section 1251 *et seq.*
- The Solid Waste Disposal Act (SWDA), 42 USC Section 6901 *et seq.*
- The Resource Conservation and Recovery Act (RCRA), 42 USC Section 82 *et seq.*
- Laws of the state of Nevada, implemented by the Nevada Department of Conservation and Natural Resources, Division of Environmental Protection.
- Safety guidelines of the Occupational Safety and Health Administration (OSHA).

Other than documents mentioned in Section 1.8, no other documents were identified as being relevant to the proposed action.

1.6 Decisions That Must Be Made

This EA has been prepared to evaluate if the selected alternative would or would not be a major action significantly affecting the quality of the human environment. If judged as not significantly affecting the quality of the human environment, then a finding of no significant impact (FONSI) would be prepared and signed, and the project would proceed. If judged as significantly affecting the quality of the human environment, then an EIS and a record of decision (ROD) would have to be prepared and signed before the project could proceed.

1.7 Scope of this Environmental Analysis

The scope of the current environmental analysis is to explore environmental issues related to the proposed action (construct a new public works facility) and the reasonable alternatives identified within this document.

1.7.1 History of the Planning and Scoping Process

Scoping evaluations were completed to identify potential environmental concerns; to facilitate an efficient environmental analysis process; to identify issues and alternatives that would be considered in detail while devoting less attention and time to less important issues; and to save time in the overall process by helping to ensure that draft documents would adequately address relevant issues, thereby reducing the time required to proceed to a final document.

Scoping evaluations were conducted during March, 2008. Participants in the scoping evaluations included the city's director of public works, the city's contract engineers, and the authors of this document. Since March, 2008, no changes have occurred to existing activities, details of the proposed action, or site conditions for any of the alternatives. The results of the March 2008 scoping evaluations are unchanged.

During the scoping activities, the following environmental issues were addressed:

- air quality;
- biological resources (threatened, endangered, sensitive species, wetlands, floodplains);
- cultural resources;
- water quality (surface water and groundwater);
- solid and hazardous wastes (including liquid waste streams and unexploded ordnance);
- soils and geology;
- occupational safety and health; and

- socio-economic resources.

1.7.2 Issues Studied in Detail

The issues that have been identified for detailed consideration and are therefore presented in Sections 3 and 4 are:

- **Air Quality** (emissions, conformity with the CAA)

Air emissions would be produced by construction equipment. Operating the proposed action would create air emissions from the used oil furnace, welding, and fueling. Air quality effects are discussed in Section 4 of this document.

The general conformity rule within the CAA requires air emissions to remain within established limits for any action that is federally funded, licensed, permitted, or approved in a nonattainment or maintenance area for national ambient air quality standards (NAAQS). Since the proposed action is located in a NAAQS attainment area, it is not subject to the conformity determination process.

- **Water Quality** (surface water and groundwater)

On the south side of the proposed action there is a small drainage ditch, which routes ephemeral flows south to a playa.

Based on discussions with design engineers, the land area to be disturbed would be greater than one acre but less than five acres in size. The proposed action would be covered under Nevada's general construction permit rule for stormwater compliance. Prior to initiating any construction activities, a permit must be obtained and erosion and sediment controls must be installed according to a stormwater pollution prevention plan. A retention basin would be constructed to keep postdevelopment flows equal to pre-development flows. Surface water effects are discussed in Section 4 of this document.

The proposed action would allow approximately 12,000 gallons of oil to be stored on site in above ground tanks. A spill prevention control and countermeasure (SPCC) plan would be required.

According to the city's contract engineers, depth to groundwater for the proposed action is 30 feet below ground surface (bgs) or greater (personal communication, Shay Stark, Aqua Engineering, April 17, 2008). The maximum proposed excavation depth would be approximately 10 feet bgs. The scoping discussions did not identify any issues related to quantity of water, groundwater, or wellhead protection zones.

Liquid waste streams created during construction and from operating the proposed action are included in the discussions related to solid and hazardous wastes in Section 4 of this document.

- **Biological Resources** (threatened, endangered, sensitive species, wetlands, floodplains)

Approximately 6.42 acres of undeveloped but previously disturbed land would be disturbed by the proposed action. During construction, the sparse vegetation would be scraped and removed, and any small animals such as the reptiles and small mammals and birds would be displaced. Operating the proposed action would not create any interaction with biological resources.

Effects related to biological resources are discussed in Section 4 of this document.

- **Solid and Hazardous Wastes** (materials to be used, stored, recycled, disposed, including liquid waste streams; unexploded ordnance; asbestos, lead-based paint, mercury, and polychlorinated biphenyls [PCBs])

During construction, solid wastes would be generated, and other hazardous wastes might be generated that would require proper treatment and/or disposal. Additional hazardous wastes could be generated if a spill of fuel, lubricants, or construction-related chemicals were to occur.

Operating the proposed action would create solid and hazardous wastes (to include solid and liquid wastes). Effects related to solid and hazardous wastes are discussed in Section 4 of this document.

1.7.3 Issues Eliminated From Further Study

The issues that were not carried forward for detailed consideration in Sections 3 and 4 are:

- **Cultural Resources** (archaeological, architectural, traditional cultural properties)

No significant cultural resources have been identified in the area of potential effect (APE) for the proposed action, which encompasses approximately six acres. The APE was previously inventoried in February 2006 as part of a larger survey in support of a separate project (P-III 2006). This inventory identified one large historic trash scatter, part of which is located within the boundaries of the current APE (on land owned by Hill AFB). The trash scatter represents sporadic and opportunistic disposal of roadside and household trash throughout the twentieth century. There was no evidence that any of the trash at the site was associated with historic military operations. In addition, the site was determined not eligible for inclusion in the National Register of Historic Places. No other cultural resources were observed during the inventory.

If any historic properties were to be found during construction, ground-disturbing activities in the immediate vicinity would cease, the Hill AFB Cultural Resources Program would be notified, and unanticipated discovery of archaeological deposits procedures would be implemented with direction from the Hill AFB Cultural Resources Program in accordance with Standard Operating Procedure 5 in the *Hill AFB Integrated Cultural Resources Management Plan* (Hill 2007b).

The Nevada State Historic Preservation Office (SHPO) concurred with a finding of no effect after reviewing the proposed action (Hill AFB 2008 - Appendix A). Hill AFB initiated a formal consultation process with 17 American Indian Tribes regarding the proposed action (Hill AFB 2008 - Appendix A). The Navajo Nation and the Hopi Tribe concurred with Hill AFB's determination that construction of the proposed public works facility would not affect historic properties (Hill AFB 2008 - Appendix A). No other responses were received.

- **Soils and Geology** (land disturbance, known pre-existing contamination, seismicity, topography, minerals, geothermal resources)

Based on discussions with design engineers, the land area to be disturbed would be greater than one acre but less than five acres in size. Excavations would be necessary to install: foundations, utilities, cables, conduit, and pipes. Erosion control measures during construction would prevent sediment from leaving the site. Stormwater pollution prevention issues are discussed in the water quality sections of this document.

Contamination of shallow soil is not known to exist in the vicinity of the proposed action. If excavated soils exhibit suspicious odors or appearance, Hill AFB environmental managers would be notified to collect soil samples, to be analyzed for hazardous vs. non-hazardous determination and subsequent action if determined hazardous.

The scoping discussions did not identify any issues related to seismicity, topography, minerals, or geothermal resources.

- **Occupational Safety and Health** (physical and chemical hazards, radiation, explosives)

Throughout the construction phase of the project, the city and their contractors would follow OSHA safety guidelines as presented in the CFR. The scoping discussions did not identify any issues related to occupational safety and health that would not be routinely addressed by OSHA rules.

- **Socio-economic Resources** (local fiscal effects including employment; population projections; schools; environmental justice)

Short-term opportunities would exist for local construction workers. The proposed action is not expected to create any new long-term jobs. The scoping discussions did not identify any issues related to population projections or schools. Due to lack of socio-economics effects as discussed in this document, environmental justice issues were considered not relevant to the proposed action.

1.8 Applicable Permits, Licenses, and Other Coordination Requirements

For the selected alternative, the City of West Wendover would be responsible for obtaining and complying with the permits, licenses, and coordination activities discussed in this section. In the

event of a spill of regulated materials, city managers and their contractors would comply with all federal, state, and local spill reporting and cleanup requirements.

Since more than one acre of land would be disturbed, a stormwater permit would be required under Nevada's general permit for stormwater discharges associated with construction activities.

An SPCC plan would be required related to oil being stored in above ground tanks.

Above ground fuel tanks would be registered with the Nevada State Fire Marshal's office.

No licenses were identified for the proposed action.

City managers would coordinate with the Hill AFB natural resources manager to ensure requirements of the *Hill AFB Integrated Natural Resources Management Plan* (Hill 2007a) are enforced.

City managers would coordinate with the Hill AFB cultural resources manager to ensure requirements of the *Hill AFB Integrated Cultural Resources Management Plan* (Hill 2007b) are enforced.

No other coordination requirements were identified for the proposed action.

2.0 ALTERNATIVES, INCLUDING THE PROPOSED ACTION

Based on the purpose, need, and selection criteria presented in Sections 1.2, 1.3, and 1.4 and the scope of this environmental analysis as discussed in Section 1.7, this section discusses the process used to develop the alternatives, presents the alternatives, compares four alternatives for their ability to achieve the project objectives, and summarizes the expected effects for the alternatives considered in detail. Finally, this section states the preferred alternative for the utilization of this land parcel.

2.1 Process Used to Develop the Alternatives

2.1.1 Development of Alternatives

As discussed in Sections 1.1 through 1.3 of this document, the City of West Wendover proposes to construct a new public works facility which would provide adequate space to conduct administrative activities, maintain vehicles, and store equipment and materials necessary for the operation of city-provided services including water, sewer, road, trail, and garbage collection systems.

The process used to develop the alternatives was limited to potential locations in or near West Wendover, and considered the criteria defined in Section 1.4. The scoping team investigated four potential alternatives for siting the public works facility.

2.1.2 Alternatives Eliminated From Detailed Study

West Wendover City managers evaluated an alternative to expand the new public works facility at the existing location. This alternative was not feasible because it did not meet the selection criterion of providing five acres of available land.

West Wendover City managers evaluated an alternative to construct the new public works facility to the north of SR-93A. This alternative was not feasible due to an agreement between the City of West Wendover and the Nevada Commission on Economic Development. In November, 2006, the city received a grant award of \$350,000 to be used in the development of a commercial and industrial park on the property to the north of SR-93A. The grant will be used in conjunction with other funds committed by the city, the Elko County Regional Transportation Commission, and Robinson Mining to complete the infrastructure improvements. This legally binding agreement prohibits municipal uses in this area.

No other parcels were identified by city managers that, based on the stated selection criteria, would reasonably accommodate the new public works facility.

2.2 Description of Alternatives Considered in Detail

2.2.1 Alternative A: No Action

The no action alternative would consist of continuing present activities (see Sections 1.1 and 1.3), with the city public works department remaining on the existing site (Figure 3) with its space limitations. The city would need to disperse equipment and materials to other locations for

storage, requiring city employees to travel to those locations when gathering equipment and materials for any given task. The result would be longer durations related to those activities, and delays when emergency repairs to the city water and sewer systems are required.

2.2.2 Alternative B: Proposed Action - Construct the Proposed Public Works Facility South of SR 93A

The proposed public works facility would be constructed south of SR 93A, on a parcel of land comprising approximately 6.42 acres (Figure 3).

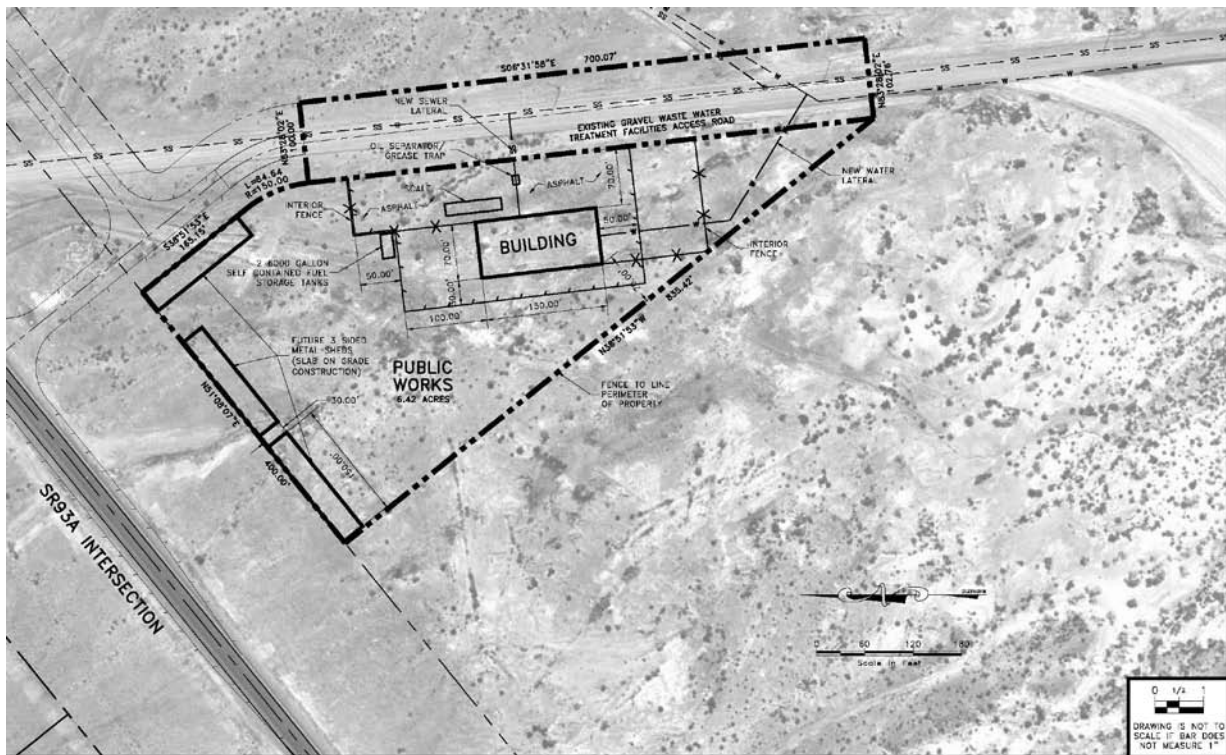


Figure 3: Proposed Site Layout

A single-story, medium bay facility (24-foot high) of approximately 5,000 ft² would be constructed. The building would consist of reinforced concrete footings, foundations, floor slab; an engineered steel structure with insulated steel wall panels; a standing seam metal roof; and fire detection/protection, heating, ventilation, and air conditioning systems. Supporting facilities would include a truck scale; an outdoor vehicle wash bay; fuel storage tanks; an oil-water separator; perimeter and interior fences; pavements; and site utilities. In the future, it is anticipated three engineered steel open face sheds would be required to store equipment and materials for the city's water, sewer, road, trail, and garbage collection systems (i.e., pipes, valves, fittings, concrete manholes and boxes, metal signs, posts, fencing, landscaping supplies, etc.).

The activities to be conducted at the new public works facility would include:

- maintaining vehicles and equipment;
- washing vehicles and equipment;
- space heating with a used oil furnace; and
- fuel, vehicle, tool, equipment, and material storage.

2.3 Summary Comparison of Alternatives

2.3.1 Predicted Achievement of Project Objectives

Project Objective	Alternative A No Action	Alternative B Proposed Action	North of SR 93A (Eliminated)	Expand in Place (Eliminated)
Have sufficient space (minimum five acres) to house all of the necessary equipment and workers (see Table 1)	No	Yes	Yes	No
Be located within one mile of the center of town, City of West Wendover	Yes	Yes	Yes	Yes
Exhibit slope under five percent, utilities within 2,000 feet, and access to SR 93A within 1,000 feet	Yes	Yes	Yes	Yes
Be legally available for the intended use (not prohibited by law, zoning, or other legal agreement)	Yes	Yes	No	Yes

Table 2: Evaluation of Project Alternatives

2.3.2 Summary Comparison of Predicted Environmental Effects

Issue	Alternative A No Action	Alternative B Proposed Action
Air Quality	<p>Existing air emissions would continue:</p> <ul style="list-style-type: none"> • from the used oil furnace; • from welding; and • from fueling operations. 	<p>Construction equipment would create temporary emissions. Potential fugitive dust emissions would be controlled in accordance with construction management practices using a water truck.</p> <p>During operations, heating the larger building would increase air emissions from the used oil furnace by approximately 20 percent. Otherwise, same as for the no action alternative.</p>
Water Resources	<p>Most stormwater remains on site. A city stormwater ditch is adjacent to the site. Above ground containers of oil are subject to the existing SPCC plan.</p>	<p>During construction, a stormwater pollution prevention plan would be implemented. During construction and operations, a retention basin would limit flows to pre-development levels. An SPCC plan would be prepared and implemented.</p>
Biological Resources	<p>No effect.</p>	<p>The site is small in relation to the surrounding area and consists of habitat that has been severely impacted by human activities. The loss of habitat would not be extensive. Few native plants and animals would be affected. Invasive species would be prevented from re-establishing themselves by control methods.</p>
Solid and Hazardous Wastes	<p>Most solid waste is sent to the city landfill. Used rags are laundered. Approximately 1,500 gallons per year of liquids are consumed in the used oil furnace. Antifreeze, some oil, hydraulic fluid, parts washer solvent, and brake fluid are sent to Safety Kleen for recycling and/or disposal. A sanitary sewer is present.</p>	<p>Uncontaminated construction debris would be generated. Any spills or releases would be investigated and remediated. Any identified unexploded ordnance or discarded military munitions would be safely removed from the site.</p> <p>During operations, an oil-water separator and a catch basin would be provided. Otherwise, same as for the no action alternative.</p>

Table 3: Summary Comparison of Predicted Environmental Effects

3.0 AFFECTED ENVIRONMENT

This section discusses the existing conditions of the potentially affected environment, establishing a resource baseline against which the effects of the alternatives can be evaluated. It presents each of the environmental issues being considered in detail, pre-existing environmental factors, and existing cumulative effects due to human activities in the vicinity of the proposed action or the alternate locations.

The following issues were discussed by the scoping team and were eliminated from further evaluation because the effects were identified as either non-existent, or so low as to be otherwise negligible (see Section 1.7.3):

- cultural resources (archaeological, architectural, traditional cultural properties);
- soils and geology (land disturbance, known pre-existing contamination, seismicity, topography, minerals, geothermal resources);
- occupational safety and health (physical and chemical hazards, radiation, explosives); and
- socio-economic resources (local fiscal effects including employment; population projections; schools; environmental justice).

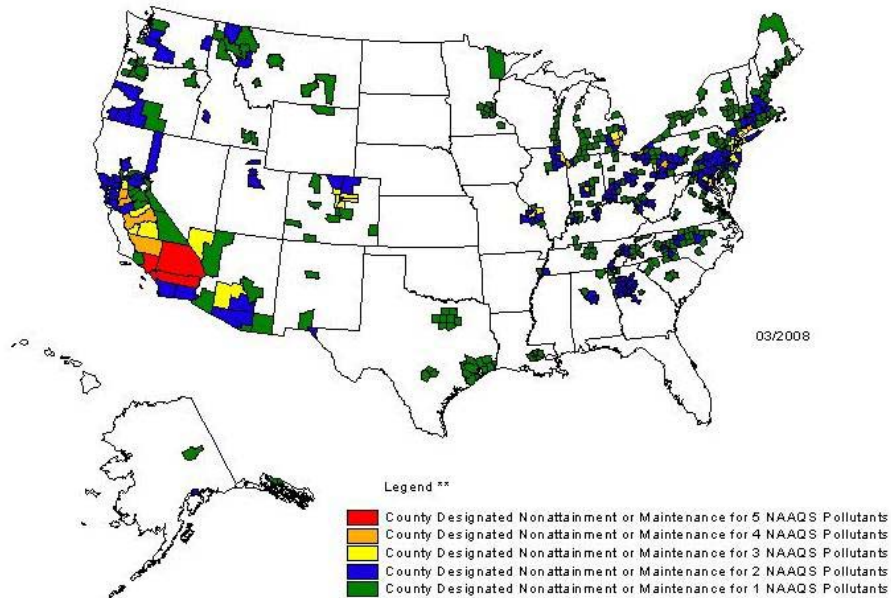
3.1 Description of Relevant Affected Issues

3.1.1 Air Quality

Areas of the country where air pollution levels persistently exceed the NAAQS for one or more of the criteria pollutants may be designated as nonattainment areas. The criteria pollutants are: nitrogen dioxide (NO₂), oxides of sulfur (SO_x), ozone (O₃), particulates less than 10 microns in diameter (PM-10), particulates less than 2.5 microns in diameter (PM-2.5), carbon monoxide (CO), and lead.

The proposed action is located in Elko County, Nevada. Elko County is in attainment status with federal clean air standards. In Nevada, the only nonattainment areas (Figure 4) are:

- Clark County (Las Vegas Area) for O₃, PM-10, and CO; and
- Washoe County (Reno Area) for O₃ and PM-10.



source: <http://www.epa.gov/air/oaqps/greenbk/mapnmpoll.html>

Figure 4: Counties Designated Non-Attainment or Maintenance for NAAQS Pollutants

The existing public works facility produces air emissions related to operating the used oil furnace; welding; and fueling, as calculated below in Tables 4, 5, and 6, respectively.

Contaminant	Emissions (mg/minute)	Emissions (lb/hour)	Emissions (lb/year)
HCl	34.6	0.00458	4.05958
Particulate	466.6	0.06172	54.74562
Arsenic	not detected		
Cadmium	not detected		
Chromium	0.17	0.00002	0.01995
Lead	2.09	0.00028	0.24522

Source: Vermont Used Oil Analysis and Waste Oil Furnace Emissions Study, March, 1996

Notes: 1,500 gallons per year burned, oil and diesel fuel

Furnace is rated at 235,000 British Thermal Units (BTU) per hour

Based on fuel usage and BTU rating, annual use was calculated as 887 hours

HCl = hydrogen chloride

mg = milligrams

lb = pounds

Table 4: Emissions From the Used Oil Furnace

Electrode Type			HAP Emission Factor (lb/10,000 lb wire)					
			Cr	Cr (VI)	Co	Mn	Ni	Pb
E6011			0.05	ND	0.01	9.98	0.05	ND
E7018			0.06	ND	≤ 0.01	10.30	0.02	ND
Electrode Type	Usage (lb/year)	Usage (lb/hour)	HAP Emissions (lb/year)					
			Cr	Cr (VI)	Co	Mn	Ni	Pb
E6011	100	0.0114	0.0005	ND	0.0001	0.0998	0.0005	ND
E7018	100	0.0114	0.0006	ND	≤ 0.0001	0.1030	0.0002	ND
Total HAPs:			0.0011	ND	≤ 0.0002	0.2028	0.0007	ND

Source: <http://www.epa.gov/ttn/chief/ap42/ch12/final/c12s19.pdf>

Table 12.19-2. HAZARDOUS AIR POLLUTANT (HAP) EMISSION FACTORS FOR WELDING OPERATIONS

All HAP emissions are in the PM-10 size range (particles ≤ 10 μm in aerodynamic diameter).

μm = micrometers, or microns

Table 5: Emissions From Welding

Fuel Type			VOC Emissions (lb/gallon)
			Gasoline
Diesel			0.00013
Fuel Type	Usage (gallons/yr)	Usage (gallons/hour)	VOC Emissions (lb/year)
			Gasoline
Diesel	29,000	3.3105	3.83
Total VOCs (lb/year):			883.83

Source: Emissions Inventory Help Sheet for Fuel Storage and Handling, Maricopa County Air Quality Department, California, 2007

Source: AP 42, Fifth Edition, Volume I, Chapter 5: Petroleum Industry

Table 5.2-5 (ratio of Distillate Oil No. 2 [diesel] emissions to gasoline emissions)

VOC = volatile organic compound

Table 6: Emissions From Fueling

3.1.2 Water Resources

At both the existing public works facility and the 6.42 acres on which the proposed action would be constructed, stormwater typically remains on site, and infrequently discharges to existing stormwater ditches on the southern side of each respective property. The ditches route such ephemeral flows to the southeast, eventually reaching a playa. Due to the ephemeral presence of water in these ditches, no surface water data exist for either parcel.

At the existing public works facility, approximately 12,000 gallons of oil (6,000 gallons each gasoline and diesel) are stored on site in above ground tanks. The fuel tanks are double-walled, providing their own secondary containment. Bollards exist around the tanks to protect them from damage by vehicles using this area of the facility. The fuel tanks are registered with the Nevada State Fire Marshal's office. An additional 300 gallons of hydraulic fluid are stored on site, and 100 gallons of oil are present in the tank that supplies fuel to the used oil furnace. These containers are provided with secondary containment. Above ground containers of oil (of 55 gallons or greater) are subject to the existing SPCC plan.

According to the city's engineers, depth to groundwater in and around West Wendover is 30 feet bgs or greater (personal communication, Shay Stark, Aqua Engineering, April 17, 2008). Scoping discussions did not identify a requirement to consider groundwater in detail.

3.1.3 Biological Resources (Including Threatened, Endangered, Sensitive Species, Wetlands, Floodplains)

Resource Analysis

The existing public works facility is unvegetated, and during a site visit by the authors of this document, no animal species were observed.

The biological resources analysis of the 6.42 acres on which the proposed action would be constructed was conducted during June of 2008. Field crews identified three primary functions associated with the ecosystem.

(1) Native plant composition using Range Land Health Index (RHI). The range land health index measures the vegetative habitat based on native versus introduced plant species present.

(2) Wildlife habitat consisting of structure and forage using Wildlife Community Index (WCI). The wildlife community index measures the ability of a habitat to provide forage and cover structure for wildlife species.

(3) Invasive plant species using Floristic Quality Index (FQI). The floristic quality index measures the level of vegetative species to displace the desired native species.

All three of these indices are based on a scale ranging from 0 to 1.0 with 1.0 denoting the best possible condition. The RHI scored 0.04. The WCI scored 0.09. The FQI scored 0.76. The best

possible range for RHI and WCI would be 0.8-1.0 while the FQI score in the same range indicates a lack of invasive plants on the proposed project site.

The RHI and WCI scores are extremely low because of the lack of vegetation on the proposed project site. The FQI score indicates a lack of invasive plant species on the site. The proposed project site is not sustainable for vegetative or wildlife species.

The sparse vegetation on the site consisted of the following shrubs and forbs.

Shrubs

- Greasewood *Sarcobatus vermiculatus* (Native)
- Shadscale *Atriplex confertifolia* (Native)
- Seepweed *Suaeda torreyana* (Native)
- Little leaf Horsebrush *Tetradymia canescens* (Native)
- Budsage *Artemisia spinosa* (Native)
- Rabbitbrush *Chrysothamnus nauseosus* (Native)

Forbs

- Gray Molly *Kochia americana* (Introduced)
- Halogeton *Halogeton glomeratus* (Introduced)
- Flixweed *Descruainia sophis* (Introduced)
- Tumbling Mustard *Sisymbrium altissimum* (Introduced)
- Russian Thistle *Salsola kali* (Introduced)
- Cheatgrass *Bromus tectorum* (Introduced)
- Indian Ricegrass *Oryzopsis hymenoides* (Native)

A walking bird, reptile, and mammal survey identified only a few species because of a lack of vegetative cover on the project site (Swallow and gulls, Side-blotched and Horned Lizard). No mammal species were observed, but a few small mammal burrows were present.

Threatened, Endangered, Sensitive Species, Wetlands, Floodplains

No species of plants or animals listed as federal and state threatened/endangered (T/E), or as a candidate for listing are known to occur in or around the 6.42 acres on which the proposed action would be constructed (Hill 2007a). There are no jurisdictional wetlands or floodplains in the vicinity of the proposed action.

3.1.4 Solid and Hazardous Wastes (Including Liquid Wastes and Unexploded Ordnance)

Operating the existing public works facility produces waste from vehicle equipment maintenance and office activities.

Solid waste is sent to the city landfill, approximately 7 miles southwest of West Wendover. These solid waste streams include brake pads (they do not contain asbestos), office trash, and

paper towels. Used rags from maintenance and repair operations are sent to Aramark industrial laundry services in Salt Lake City, Utah.

On an annual basis, approximately 150 gallons of antifreeze (includes public drop off), 150 gallons of oil that can't be burned due to presence of water or antifreeze (from public drop off), 100 gallons of hydraulic fluid, 10 gallons of petroleum-based parts washer solvent, and 10 gallons of brake fluid are sent to Safety Kleen for proper recycling and/or disposal. Public drop off is only available when the facility is open and when city employees are present to control such activities and monitor for drips, leaks, or spills.

All wastewater from the offices and the vehicle maintenance area flows to the city's existing wastewater treatment plant.

All other liquids (approximately 1,500 gallons per year) are consumed as fuel in the used oil furnace, consisting of 1,000 gallons used oil and the remainder is diesel fuel.

No solid or liquid waste is produced by use of chassis gear lubricant, lubricant sprays, or welding.

No hazardous waste is known to exist for the 6.42 acres on which the proposed public works facility would be constructed. An environmental baseline survey (West Wendover 2008, recertified in April 2010) concluded, "No conditions were observed that would indicate presence of environmental contamination within the boundaries of the proposed 6.42 acre real estate action."

The surface and near-surface layers of the 6.42 acre site were investigated for presence of unexploded ordnance and discarded military munitions (Blasting 2008). Four expended civilian shotgun shells and one expended 20 millimeter ammunition casing were observed. No items of unexploded ordnance were identified.

3.2 Description of Relevant Pre-Existing Environmental Factors

The Nevada Bureau of Mines and Geology has estimated the probability of the West Wendover area experiencing an earthquake of given sizes or greater over a 50-year period. The estimates were prepared using the US Geological Survey probabilistic seismic hazard analysis model. Although it is nearly impossible to specifically predict what an earthquake of a given size might do to a community, the earthquake size relates to general level of damage. Magnitude 6.5 earthquakes can create surface offsets, may be of longer duration, and can cause significant damage. The probability of an earthquake of magnitude 6.5 or greater occurring within 50 kilometers (31 miles) of the proposed action over a 50-year period is between one and two percent.

During scoping discussions and subsequent analysis, no other pre-existing environmental factors (e.g., hurricanes, tornados, floods, droughts) were identified.

3.3 Description of Areas Related to Cumulative Effects

During scoping discussions and subsequent analysis, no pre-existing cumulative effects were identified.

4.0 ENVIRONMENTAL CONSEQUENCES

This section discusses effects to the resources that were identified for detailed analysis in Section 1.7.2, and for which existing conditions were presented in Section 3.3. For each of these resources, the no action alternative and the proposed action are considered.

4.1 Predicted Effects to Air Quality

4.1.1 Alternative A: No Action

With respect to air quality, the no action alternative would have the same effects as described in Section 3.1.1.

4.1.2 Alternative B (Proposed Action): Construct the Proposed Public Works Facility South of SR 93A

Effects Due to Construction

- **Fugitive Dust:** Emissions of PM-10 and PM-2.5 would be produced as soil is disturbed during proposed construction activities. The US Environmental Protection Agency (EPA) has estimated that fugitive dust emissions from construction activities produce 0.11 tons of PM-10 per acre per month (EPA 1998), and the PM-2.5 component equals approximately 10 percent of the PM-10 value (MRI 2006). Assuming two months of scraping, grading, excavation, and backfill activities over a worst case area of just under five acres, uncontrolled fugitive dust emissions of 1.1 tons of PM-10 and 0.11 tons of PM-2.5, respectively, were therefore calculated for the proposed action.

Fugitive emissions from construction activities would be controlled in accordance with construction management practices using a water truck during construction activities. Haul roads and other work areas would be kept wet. Any soil that is deposited on nearby paved roads by construction vehicles would be removed from the roads and returned to the site.

- **Heavy Equipment:** The internal combustion engines of heavy equipment would generate emissions of VOCs, CO, NO_x, PM-10, PM-2.5, HAPs, and SO_x. Assumptions and estimated emissions for the construction period are listed in Table 7.

Data Assumptions						
Equipment Type	Diesel Emission Factor (lbs/hr)					
	VOC (HC)	CO	NOx	PM10	HAPs	SOx
Asphalt Paver	0.28	1.24	2.96	0.24	0.05	0.25
Bobcat Loader	0.14	0.67	1.00	0.10	0.01	0.08
Cable Plow	0.59	3.75	4.49	0.59	0.08	0.38
Compressor (boring)	0.25	1.62	1.94	0.25	0.04	0.16
Concrete Truck	0.80	3.55	8.50	0.69	0.15	0.72
Crane	2.14	6.96	17.08	2.39	0.33	1.54
Dump Truck	0.63	2.04	6.98	0.58	0.16	0.65
Flat Bed Truck	0.48	1.54	5.29	0.44	0.12	0.49
Fork Lift	0.42	2.47	1.98	0.40	0.05	0.23
Generator	0.02	0.10	0.12	0.02	0.00	0.01
Loader/Backhoe	0.87	4.12	6.12	0.64	0.06	0.52
Motored Grader	0.83	2.01	5.08	0.53	0.06	0.46
Scraper	0.33	2.31	4.03	0.58	0.13	0.42
Track Hoe	0.91	6.65	13.75	1.84	0.26	1.19
Vibratory Compactor	0.38	1.44	4.31	0.36	0.09	0.46
Water Truck	1.10	3.58	12.28	1.02	0.28	1.14
Wheeled Dozer	0.46	1.48	5.08	0.35	0.08	0.49

Note: VOCs = Hydrocarbons and HAPs = Aldehydes
Source: Industry Horsepower Ratings and EPA 460/3-91-02

Construct West Wendover Municipal Building							
EQUIPMENT TYPE	HOURS OF OPERATION	Diesel Emissions (lbs)					
		VOC	CO	NOx	PM10	HAPs	SOx
Asphalt Paver		0	0	0	0	0	0
Bobcat Loader		0	0	0	0	0	0
Cable Plow		0	0	0	0	0	0
Compressor (boring)		0	0	0	0	0	0
Concrete Truck	16	12.8	56.8	136	11.04	2.4	11.52
Crane		0	0	0	0	0	0
Dump Truck	130	81.9	265.2	907.4	75.4	20.8	84.5
Flat Bed Truck		0	0	0	0	0	0
Fork Lift		0	0	0	0	0	0
Generator		0	0	0	0	0	0
Loader/Backhoe	50	43.5	206	306	32	3	26
Motored Grader	40	33.2	80.4	203.2	21.2	2.4	18.4
Scraper	40	13.2	92.4	161.2	23.2	5.2	16.8
Track Hoe	40	36.4	266	550	73.6	10.4	47.6
Vibratory Compactor	80	30.4	115.2	344.8	28.8	7.2	36.8
Water Truck	40	44	143.2	491.2	40.8	11.2	45.6
Wheeled Dozer		0	0	0	0	0	0
TOTAL ESTIMATED EMISSIONS (lbs)		295.4	1225.2	3099.8	306.0	62.6	287.2
TOTAL ESTIMATED EMISSIONS (tons)		0.15	0.61	1.55	0.15	0.03	0.14

Source of Hours: Estimates From Shay Stark, Aqua Engineering

Table 7: Calculated Heavy Equipment Emissions

Since construction activities would disturb less than five acres of land, a Nevada surface area disturbance permit (and the accompanying fugitive dust control plan) would not be required.

Effects Due to Operations

The proposed action would increase heated square footage from the current value of 4,150 ft² to 4,974 ft², an increase of 20 percent. Emissions of particulates would increase by 11 pounds per year. Emissions of HCl, chromium, and lead would increase by less than one pound per year each.

With respect to welding and fueling, operating the proposed action would have the same effects as described in Section 3.1.1 for the no action alternative.

Review of the Nevada Administrative Code, Section 445B.288, and conversations with Mr. Randy Phillips, staff engineer with Nevada's Bureau of Air Pollution Control revealed that no operational air permits would be required.

4.2 Predicted Effects to Water Resources

4.2.1 Alternative A: No Action

With respect to water resources, the no action alternative would have the same effects as described in Section 3.1.2.

4.2.2 Alternative B (Proposed Action): Construct the Proposed Public Works Facility South of SR 93A

Effects Due to Construction

Based on discussions with design engineers, the land area to be disturbed would be greater than one acre but less than five acres in size. The proposed action would be covered under Nevada's general construction permit rule for stormwater compliance. Prior to initiating any construction activities, a permit would be obtained and erosion and sediment controls would be installed according to a stormwater pollution prevention plan. A retention basin would be constructed to ensure discharges during the construction period would not exceed pre-development flow rates. Design engineers have calculated the required volume of the retention basin to be 7,769 cubic feet.

Effects Due to Operations

The same retention basin mentioned above would ensure discharges during the operational period would not exceed pre-development flow rates. Design engineers have calculated the required volume of the retention basin to be 7,769 cubic feet.

The proposed action would allow approximately 12,000 gallons of oil (6,000 gallons each gasoline and diesel) to be stored on site in above ground tanks. The fuel tanks would be double-walled, providing their own secondary containment. Bollards would be installed around the tanks to protect them from damage by vehicles using this area of the facility. The fuel tanks would be registered with the Nevada State Fire Marshal's office. An additional 300 gallons of hydraulic fluid would be stored on site, and 100 gallons of oil would be present in the tank that

supplies fuel to the used oil furnace. These containers would also be provided with secondary containment. An SPCC plan would be required related to oil being stored in above ground tanks.

According to the city's contract engineers, depth to groundwater for the proposed action is 30 feet bgs or greater (personal communication, Shay Stark, Aqua Engineering, April 17, 2008). The maximum proposed excavation depth would be approximately 10 feet bgs. No groundwater effects were identified for the proposed action.

4.3 Predicted Effects to Biological Resources (Including Threatened, Endangered, Sensitive Species, Wetlands, Floodplains)

4.3.1 Alternative A: No Action

With respect to biological resources, the no action alternative would have no direct effects, no indirect effects, and no cumulative effects.

4.3.2 Alternative B (Proposed Action): Construct the Proposed Public Works Facility South of SR 93A

Effects Due to Construction

During construction of the proposed action, the sparse vegetation would be scraped and removed, and any small animals such as the reptiles and small mammals and birds would be displaced. Invasive species would be prevented from re-establishing themselves within the proposed project area using targeted spraying of herbicides.

Because the site is small in relation to the surrounding area and consists of habitat that has been severely impacted by human activities, the loss of habitat would not be extensive. The proposed area has been impacted by past projects resulting in sparse vegetation (RHI = 0.04) and low quality wildlife structure (WCI= 0.09). Few native plants and animals would be adversely affected from constructing the proposed action.

Effects Due to Operations

With respect to operating the proposed action, no revegetation activities would be performed. Invasive species would be prevented from re-establishing themselves within the proposed project area using targeted spraying of herbicides. It has been the city's experience that invasive species outcompete native species, and the targeted spraying of invasive species would simultaneously prevent establishment of native species, for both operational and vacant portions of the property. No other effects to biological resources were identified due to operating the proposed action.

4.4 Predicted Effects to Solid and Hazardous Wastes (Including Liquid Wastes and Unexploded Ordnance)

4.4.1 Alternative A: No Action

With respect to solid and hazardous wastes, the no action alternative would have the same effects as described in Section 3.1.4.

4.4.2 Alternative B (Proposed Action): Construct the Proposed Public Works Facility South of SR 93A

Effects Due to Construction

- **Waste Generation:** During the proposed construction activities, solid wastes expected to be generated would be construction debris consisting mainly of concrete, metal, and building materials. These items would be treated as uncontaminated trash. It is possible that equipment failure or a spill of fuel, lubricants, or construction related chemicals could generate solid or hazardous wastes. In the event of a spill of regulated materials, city managers and their contractors would comply with all federal, state, and local spill reporting and cleanup requirements.
- **Excavated Soils:** If excavated soils from Hill AFB property exhibit suspicious odors or appearance, the following standard procedures would be followed. Samples from suspect wastes on Hill AFB are analyzed for hazardous vs. non-hazardous determination. The suspect wastes are stored at sites operated in accordance with the requirements of 40 CFR 265 while analytical results are pending. Hazardous wastes are eventually labeled, transported, treated, and disposed in accordance with federal and state regulations. All other excess soil from areas receiving footings and foundations would remain on site and be used as part of the site grading activities.
- **Unexploded Ordnance:** During the proposed construction activities, the site would be cleared for unexploded ordnance and discarded military munitions as excavation activities proceed (approximately one clearance event per foot of depth). If such items are suspected or observed, excavation activities would cease until the items have either been determined not to exist or have been safely removed from the site. To perform the clearance, the City of West Wendover would employ a contractor whose qualifications would be approved by Hill AFB. The contractor would prepare a clearance plan, to be approved by Hill AFB prior to initiating site activities.

Effects Due to Operations

The outdoor vehicle wash bay would be equipped with a catch basin to trap sand and other settleable solids. Wastewater from the vehicle maintenance area would be routed through a two-chamber oil-water separator. All of these flows, and wastewater from the offices would be routed to the city's existing wastewater treatment plant. The inside of the oil-water separator and the catch basin would be visually inspected once per year, and the depth of accumulated solids in each would be determined by probing the chambers. At appropriate intervals, as determined during the inspections, contents of the oil-water separator and the catch basin, both solids and liquids, would be removed using a vacuum truck. Since petroleum-regulated materials are expected, the removed materials would be transported, treated, and disposed in accordance with federal and state regulations.

With respect to other solid and hazardous waste issues, operating the proposed action would have the same effects as described in Section 4.4.1 for the no action alternative. Petroleum regulated wastes, but no hazardous wastes, would be generated. In the event of a spill of

regulated materials, city managers and their contractors would comply with all federal, state, and local spill reporting and cleanup requirements.

4.5 Indirect Effects

During scoping and the detailed analyses, no indirect effects related to any of the resources were identified for any of the alternatives.

4.6 Cumulative Effects

During scoping and the detailed analyses, no cumulative effects were identified for any of the alternatives.

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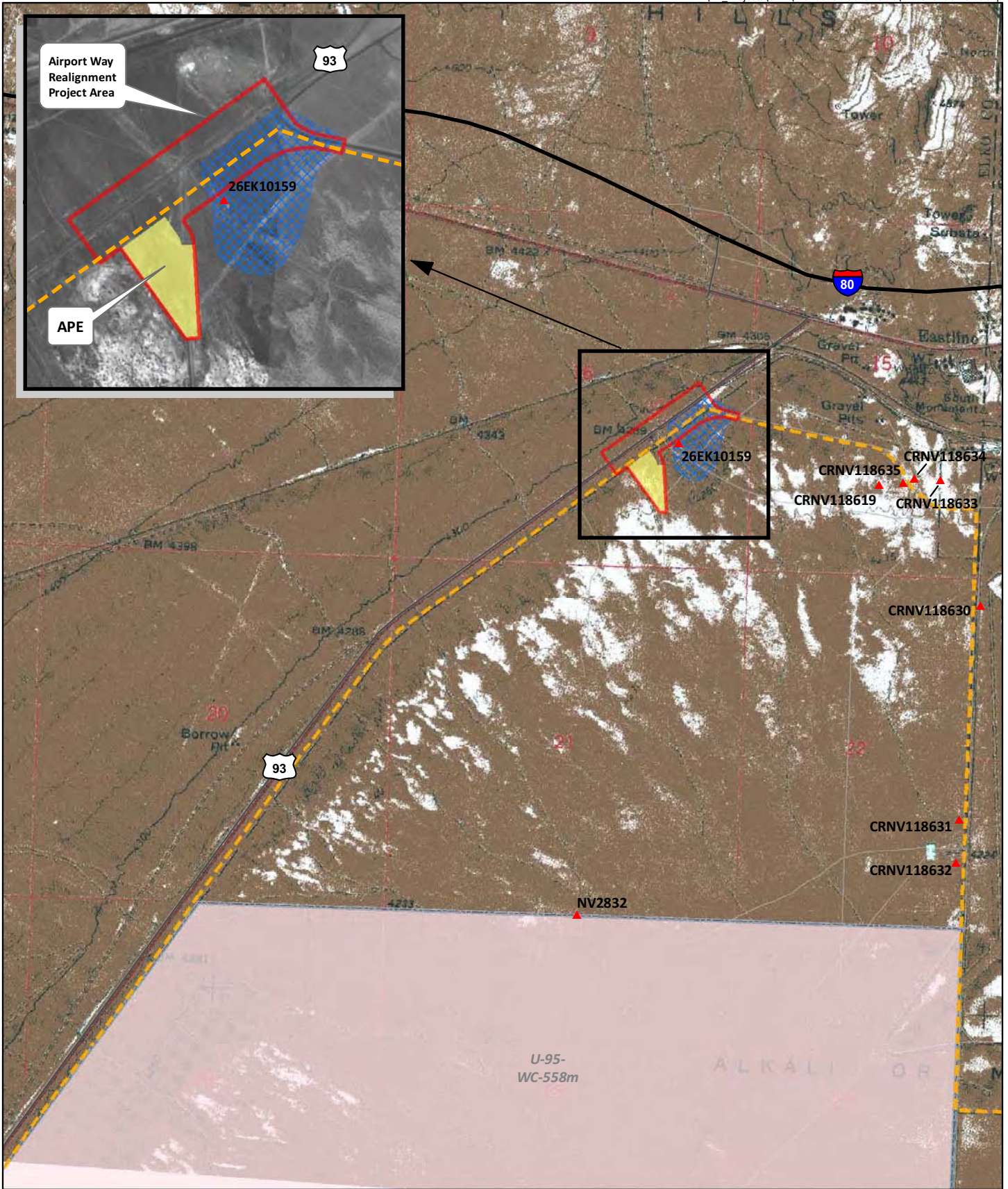
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APPENDIX A

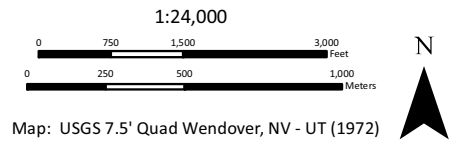
STATE HISTORIC OFFICE AND CULTURAL RESOURCES CONSULTATIONS





Area of Potential Effect for the Proposed West Wendover, Nevada Public Works Facility

- Explanation
- ▲ Archeological Site Datum
 - Airport Way Realignment APE
 - Public Works Property
 - Site Area 26EK10159
 - Previously Inventoried Area
 - HAFB Boundary





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75TH CIVIL ENGINEER GROUP (AFMC)
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Browning, Montana 59417

Dear Chairman Old Person

The city of West Wendover, Nevada proposes to construct a new facility on land managed by the U.S. Air Force, Hill Air Force Base (AFB) to accommodate its public works department. The Area of Potential Effect (APE) encompasses approximately 6.42 acres in Elko County, Nevada (Attachment 1, Area of Potential Effect for Proposed West Wendover, Nevada Public Works Facility). The APE was previously inventoried in February 2006 by P-III Associates, Inc., as part of a larger survey in support of the Airport Way realignment project. This inventory was conducted on property managed by Hill AFB and the Bureau of Land Management (BLM), Elko Field Office, summarized in the report, *A Class III Cultural Resources Inventory for the Airport Way Realignment Project, West Wendover, Elko County, Nevada* (BLM Report No. 1-2511[P]), and submitted to the BLM Elko Field Office, lead agency for the Airport Way realignment project. One historic site was found, 26Ek10159 (CrNV-11-13653), and determined ineligible for the National Register of Historic Places.

Based on the previous inventory and report, Hill AFB has determined the proposed construction of the public works facility will have no effect to historic properties and is notifying you as specified in 36 CFR §800.4(d)(1). If any historic properties are found during construction, ground-disturbing activities in the immediate vicinity will cease, the Hill AFB Cultural Resources Program will be notified, and the unanticipated discovery of archaeological deposits procedures shall be implemented with direction from the Hill AFB Cultural Resources Program and in accordance with the Hill AFB Integrated Cultural Resources Management Plan (Attachment 2, Unanticipated Discovery of Archaeological Resources).

An Environmental Assessment has been prepared for the proposed project. If you would like a copy of this document to review, or should you or your staff have any questions about the project, please contact our archaeologist, Ms. Jaynie Hirschi, 75th CEG/CEVOR, at (801) 775-6920 or at jaynie.hirschi@hill.af.mil.

Sincerely



W. ROBERT JAMES, Ph.D., P.E.
Chief, Environmental Management Division
75th Civil Engineer Group

Attachments:

1. Area of Potential Effect for Proposed West Wendover, Nevada Public Works Facility
2. Unanticipated Discovery of Archaeological Resources

cc:

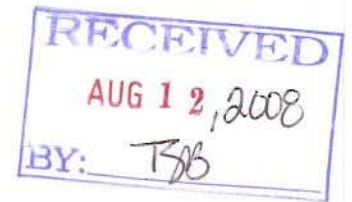
Roger "Sassy" Running Crane, Vice-Chair, Blackfeet Tribe
John Murray, Tribal Historic Preservation Officer, Blackfeet Tribe

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Shoshone-Paiute Tribes of the Duck Valley Reservation
Skull Valley Band of Goshute Indians
Te-Moak Tribe of Western Shoshone Indians
Ute Indian Tribe
Ute Mountain Ute Tribe



THE NAVAJO NATION



JOE SHIRLEY, JR.
PRESIDENT

BEN SHELLY
VICE-PRESIDENT

August 06, 2008

Mr. Robert James, Chief
Environmental Management Division
75th Civil Engineer Group
7274 Wardleigh Road
Hill Air Force Base, Utah 84056-5137

Subject: Tribal Consultation Request. Proposing to construct a public works facility on land managed by the U.S. Air Force Base, West Wendover, Elko County, Nevada.

Dear Mr. James:

Our apology for an oversight and missing the deadline date of our response to your request, please note that in reference to your letter July 14, 2008, the Historic Preservation Department – Traditional Culture Program (HPD-TCP) received a request for consultation regarding the above undertaking and/or project. After reviewing your consultation documents, HPD-TCP has concluded the proposed undertaking/project area **will not impact** any Navajo traditional cultural properties or historical properties. The project is outside the Navajo Aboriginal Lands.

The HPD-TCP appreciates your agency's consultation efforts, pursuant to 36 CFR Pt. 800.1 (c)(2)(iii). Should you have additional concerns and/or questions, do not hesitate to contact me. My contact information is listed below.

Sincerely,

A handwritten signature in blue ink that reads "Timothy Begay".

Mr. Timothy Begay, Cultural Specialist
Historic Preservation Department – Traditional Culture Program

Tel: 928.871.7688

Fax: 928.871.7886

E-mail: <timothy_begay@yahoo.com>

TCP 08-797
File: Office file/chrono



DEPARTMENT OF THE AIR FORCE
75TH CIVIL ENGINEER GROUP (AFMC)
HILL AIR FORCE BASE UTÁH

RECEIVED
JUL 18 2008

BY:

14 July 2008

Dr. W. Robert James
Chief, Environmental Management Division
75th CEG/CEV
7274 Wardleigh Road
Hill Air Force Base, Utah 84056-5137

Benjamin Nuvamsa, Chair
Hopi Tribe
Cultural Preservation Office
PO Box 123
Kykotsmovi, AZ 86039

Dear Chairman Nuvamsa

The city of West Wendover, Nevada proposes to construct a new facility on land managed by the U.S. Air Force, Hill Air Force Base (AFB) to accommodate its public works department. The Area of Potential Effect (APE) encompasses approximately 6.42 acres in Elko County, Nevada (Attachment 1, Area of Potential Effect for Proposed West Wendover, Nevada Public Works Facility). The APE was previously inventoried in February 2006 by P-III Associates, Inc., as part of a larger survey in support of the Airport Way realignment project. This inventory was conducted on property managed by Hill AFB and the Bureau of Land Management (BLM), Elko Field Office, summarized in the report, *A Class III Cultural Resources Inventory for the Airport Way Realignment Project, West Wendover, Elko County, Nevada* (BLM Report No. 1-2511[P]), and submitted to the BLM Elko Field Office, lead agency for the Airport Way realignment project. One historic site was found, 26Ek10159 (CrNV-11-13653), and determined ineligible for the National Register of Historic Places.

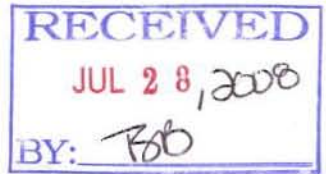
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An Environmental Assessment has been prepared for the proposed project. If you would like a copy of this document to review, or should you or your staff have any questions about the project, please contact our archaeologist, Ms. Jaynie Hirschi, 75th CEG/CEVOR, at (801) 775-6920 or at jaynie.hirschi@hill.af.mil.

Sincerely



W. ROBERT JAMES, Ph.D., P.E.
Chief, Environmental Management Division
75th Civil Engineer Group



Attachments:

1. Area of Potential Effect for Proposed West Wendover, Nevada Public Works Facility
2. Unanticipated Discovery of Archaeological Resources

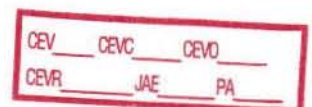
cc:

Leigh Kuwanwisima, Director of Cultural Preservation, Hopi Tribe

concur
Margaret
for
KUWANWISIMA
7-22-08

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San Juan Southern Paiute Tribe
Shoshone-Bannock Tribes of the Fort Hall Reservation
Shoshone-Paiute Tribes of the Duck Valley Reservation
Skull Valley Band of Goshute Indians
Te-Moak Tribe of Western Shoshone Indians
Ute Indians Tribe
Ute Mountain Ute Tribe





DEPARTMENT OF THE AIR FORCE
75TH CIVIL ENGINEER GROUP (AFMC)
HILL AIR FORCE BASE UTAH

10 July 2008

Dr. W. Robert James
Chief, Environmental Management Division
75th CEG/CEV
7274 Wardleigh Road
Hill Air Force Base, Utah 84056-5137

Ms. Rebecca Palmer
Nevada State Historic Preservation Office
100 N. Stewart St.
Carson City, NV 89710

Dear Ms. Palmer

The city of West Wendover, Nevada proposes to construct a new facility on land managed by the U.S. Air Force, Hill Air Force Base (AFB) to accommodate its public works department. The Area of Potential Effect (APE) encompasses approximately 6.42 acres in Elko County, Nevada (Attachment 1, Area of Potential Effect for Proposed West Wendover, Nevada Public Works Facility). The APE was previously inventoried in February 2006 by P-III Associates, Inc., as part of a larger survey in support of the Airport Way realignment project. This inventory was conducted on property managed by Hill AFB and the Bureau of Land Management (BLM), Elko Field Office. A copy of the final report, *A Class III Cultural Resources Inventory for the Airport Way Realignment Project, West Wendover, Elko County, Nevada* (BLM Report No. 1-2511[P]), was sent to your office by the BLM Elko Field Office, lead agency for the Airport Way realignment project. One historic site was found, 26Ek10159 (CrNV-11-13653), and determined ineligible for the National Register of Historic Places (Attachment 2, Nevada State Historic Preservation Office Airport Way Realignment Project Concurrence Letter).

Based on the previous inventory and report, Hill AFB has determined the proposed construction of the public works facility will have no effect to historic properties and has notified its consulting American Indian Tribes [36 CFR §800.4(d)(1)] (Attachment 3, Hill AFB Consulting American Indian Tribes). I request your concurrence in these determinations as specified in 36 CFR §800. If any historic properties are found during construction, ground-disturbing activities in the immediate vicinity will cease, the Hill AFB Cultural Resources Program will be notified, and the unanticipated discovery of archaeological deposits procedures shall be implemented with direction from the Hill AFB Cultural Resources Program and in accordance with the Hill AFB Integrated Cultural Resources Management Plan (Attachment 4, Unanticipated Discovery of Archaeological Resources).

An Environmental Assessment has been prepared for the proposed project. If you would like a copy of this document to review, or should you or your staff have any questions about the project, please contact our archaeologist, Ms. Jaynie Hirschi, 75th CEG/CEVOR, at (801) 775-6920 or at jaynie.hirschi@hill.af.mil.

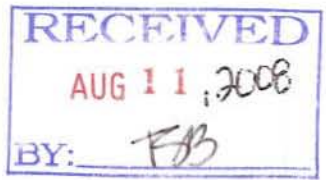
Sincerely



W. ROBERT JAMES, Ph.D., P.E.
Chief, Environmental Management Division
75th Civil Engineer Group

Attachments:

1. Area of Potential Effect for Proposed West Wendover, Nevada Public Works Facility
2. Nevada State Historic Preservation Office Airport Way Realignment Project Concurrence Letter
3. Hill AFB Consulting American Indian Tribes
4. Unanticipated Discovery of Archaeological Resources



STATE OF NEVADA
 DEPARTMENT OF CULTURAL AFFAIRS
 State Historic Preservation Office
 100 N. Stewart Street
 Carson City, Nevada 89701
 (775) 684-3448 • Fax (775) 684-3442
 www.nvshpo.org

JIM GIBBONS
 Governor

MICHAEL E. FISCHER
 Department Director

RONALD M. JAMES
 State Historic Preservation Officer

August 7, 2008

W. Robert James, Ph.D.
 Chief, Environmental Management Division
 75th Civil Engineer Group
 Department of the Air Force
 75th CEG/CEV
 7274 Wardleigh Road
 Hill Air Force Base UT 84056-5137

RE: New Public Works Department, City of West Wendover, Elko County.

Dear Dr. James:

The Nevada State Historic Preservation Office (SHPO) reviewed the subject undertaking. The previous cultural resource inventory report was completed following an intensive archaeological and historic inventory of the project area. The SHPO concurs with the U.S. Department of the Air Force's determination that no historic properties were found within the area of potential effects (APE) for the subject undertaking.

If you have any questions concerning this correspondence, please contact me by phone at (775) 684-3443 or by e-mail at Rebecca.Palmer@nevadaculture.org.

Sincerely,

Rebecca Lynn Palmer
 Review and Compliance Officer, Archaeologist

CEV	<input checked="" type="checkbox"/>	CEVC	<input type="checkbox"/>	CEVO	<input type="checkbox"/>
CEVR	<input type="checkbox"/>	JAE	<input checked="" type="checkbox"/>	PA	<input type="checkbox"/>

H. Fischer



KENNY C. GUINN
Governor

SCOTT K. SISCO
Interim Director

STATE OF NEVADA

DEPARTMENT OF CULTURAL AFFAIRS

Nevada State Historic Preservation Office

RECEIVED
BUREAU OF LAND MANAGEMENT
ELKO FIELD OFFICE

100 N. Stewart Street

Carson City, Nevada 89701

2006 JUL 21 AM 7:50 (775) 684-3448 • Fax (775) 684-3442

www.nvshpo.org

July 14, 2006

Clinton R. Oke
Assistant Field Manager
Non-Renewable Resources
Elko Field Office
3900 East Idaho Street
Elko NV 89801-4611

RE: Airport Way Realignment Project, West Wendover, Elko County (Bureau of Land Management Report Number: 1-2511).

Dear Mr. Oke:

The Nevada State Historic Preservation Office (SHPO) reviewed the subject undertaking. The SHPO concurs with the Bureau of Land Management's determination that the following site is not eligible for the National Register of Historic Places under any of the Secretary's criteria:

26Ek10159 (CrNV-11-13653).

This cultural resource inventory report was completed following an intensive archaeological and historic inventory of the project area. The SHPO concurs with the Bureau of Land Management's determination that no historic properties were found within the area of potential effects (APE) for the subject undertaking.

If buried and previously unidentified resources are located during project activities, the SHPO recommends that all work in the vicinity of the find cease and this office be contacted for additional consultation per 36 CFR 800.13.b.3..

If you have any questions concerning this correspondence, please feel free to call Rebecca Lynn Palmer at (775) 684-3443 or by E-mail at rlpalmer@clan.lib.nv.us.

Sincerely,

Alice M. Baldrice, Deputy
State Historic Preservation Officer

ELKO FIELD OFFICE	
DM	
ADM	
PLAN/NEPA	
LAW ENF	
NON-RENEW	<input checked="" type="checkbox"/>
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S.S.	
RONALD M. JAMES State Historic Preservation Officer	
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Standard Operating Procedure
**UNANTICIPATED DISCOVERY OF
ARCHAEOLOGICAL DEPOSITS**

APPLICABLE LAWS AND REGULATIONS

- ◆ National Historic Preservation Act
- ◆ National Environmental Policy Act
- ◆ Native American Graves Protection and Repatriation Act
- ◆ AFI 32–7065 (June 2004), *Cultural Resources Management Program*

OVERVIEW

All undertakings that disturb the ground surface have the potential to discover buried and previously unknown archaeological deposits. The accidental discoveries of archaeological deposits during an undertaking can include but are not limited to:

- ◆ Undiscovered/undocumented structural and engineering features; and
- ◆ Undiscovered/undocumented archaeological resources such as foundation remains, burials, artifacts, or other evidence of human occupation.

POLICY

When cultural resources are discovered during the construction of any undertaking or ground-disturbing activities, Hill AFB shall:

- ◆ Evaluate such deposits for NRHP eligibility.
- ◆ Treat the site as potentially eligible and avoid the site insofar as possible until an NRHP eligibility determination is made.
- ◆ Make reasonable efforts to minimize harm to the property until the Section 106 process is completed.
- ◆ **The BHPO will ensure that the provisions of NAGPRA are implemented first if any unanticipated discovery includes human remains, funerary objects, or American Indian sacred objects (see SOP #6).**

PROCEDURE

Step 1: Work shall cease in the area of the discovery (Figure 5-5). Work may continue in other areas.

- ◆ The property is to be treated as eligible and avoided until an eligibility determination is made. Hill AFB will continue to make reasonable efforts to avoid or minimize harm to

Further construction activities in the vicinity of the site will be suspended until an agreed-upon testing strategy has been carried out and sufficient data have been gathered to allow a determination of eligibility. The size of the area in which work should be stopped shall be determined in consultation with the **BHPO**.

the property until the Section 106 process is completed.

Step 2: Immediately following the discovery, the **Project Manager** shall notify the installation **BHPO**.

Step 3: The **BHPO** or a professional archaeologist shall make a field evaluation of the context of the deposit and its probable age and significance, record the findings in writing, and document with appropriate photographs and drawings.

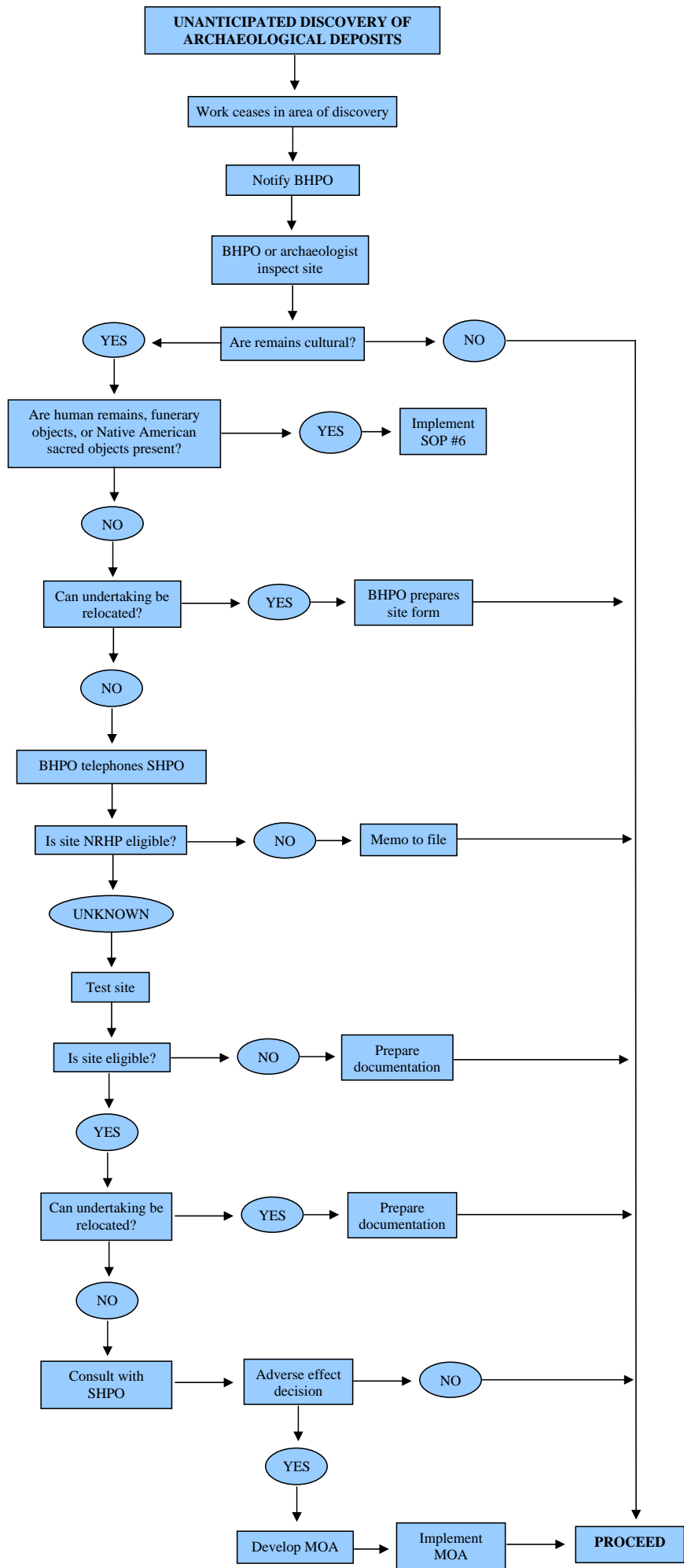
- ◆ If disturbance of the deposits is minimal and the excavation can be relocated to avoid the site, the **BHPO** will file appropriate site forms in a routine manner.
- ◆ If the excavation cannot be relocated, the **BHPO** shall notify the office of the **SHPO** to report the discovery and to initiate an expedited consultation.

The Section 106 review process is initiated at this point.

- ◆ If the deposits are determined to be ineligible for inclusion in the NRHP, then Hill AFB **BHPO** will prepare a memorandum for record and the construction may proceed.
- ◆ If the existing information is inadequate for an NRHP eligibility determination, Hill AFB **BHPO** shall develop an emergency testing plan in coordination with the SHPO.

Step 4: Hill AFB shall have qualified personnel conduct test excavations of the deposits to determine NRHP eligibility.

- ◆ Hill AFB BHPO, in consultation with the SHPO, will determine appropriate methodology for NRHP eligibility determination.
- ◆ If the SHPO and Hill AFB agree that the deposits are ineligible for inclusion in the NRHP, then work on the undertaking may proceed.
- ◆ If the deposits appear to be eligible, or Hill AFB and the SHPO cannot agree on the question of eligibility, then Hill AFB shall implement alternative actions, depending on the urgency of the proposed action.
 - Hill AFB may relocate the project to avoid the adverse effect.
 - Hill AFB may request the Keeper of the National Register to provide a determination.
 - Hill AFB may proceed with a data recovery plan under a MOA developed in coordination with the SHPO and possibly the ACHP and interested parties.
 - **Hill AFB may request comments from the ACHP and may develop and implement actions that take into account the effects of the undertaking on the property to the extent feasible and the comments of the SHPO, ACHP, and interested parties. Interim comments must be provided to Hill AFB within 48 hours; final comments must be provided within 30 days.**



**FINDING OF NO SIGNIFICANT IMPACT
PUBLIC WORKS FACILITY
CITY OF WEST WENDOVER, NEVADA**

Pursuant to the Council on Environmental Quality regulations for implementing procedural provisions of the National Environmental Policy Act (NEPA) (Title 40 of the Code of Federal Regulations [CFR], Parts 1500–1508), 32 CFR Part 989, and Department of Defense Directive 6050.1, the City of West Wendover, Nevada with support from the Air Force has prepared an Environmental Assessment (EA) to identify and evaluate potential impacts associated with constructing a public works facility on land owned by Hill Air Force Base (AFB). This EA is incorporated by reference into this finding.

Purpose of and Need for the Proposed Action (EA Sections 1.2 and 1.3, pages 2 to 3)

The purpose of the proposed action is to provide an adequately sized public works facility for the City of West Wendover. The main structure would contain offices and a vehicle and equipment maintenance facility. The yard would provide fenced storage space for vehicles, equipment, and materials related to operation and maintenance of public water, sewer, road, trail, and garbage collection systems. Within the next five years, the city plans to construct additional sheds to provide covered storage for equipment and materials.

The proposed action is needed to provide adequate space for the City of West Wendover’s public works department to conduct administrative activities, maintain vehicles, and store equipment and materials necessary for the operation of city-provided services including water, sewer, road, trail, and garbage collection systems. Historic and anticipated city population growth of two percent per year has resulted in a public works facility that is outdated and lacks sufficient space for public works employees to efficiently complete their assigned operational and administrative duties. If an adequately sized facility is not provided, the city could become limited in its ability to maintain equipment required for the safe operation of public services.

Description of the Proposed Action and Alternatives (EA Section 2, pages 10 to 13)

A screening process was developed to determine the range of reasonable alternatives to carry forward for further analyses within the EA. Screening was based on meeting the purpose and need, and included:

- sufficient space (minimum five acres) to house all of the necessary equipment and workers
- located within one mile of the center of town, City of West Wendover
- slope under five percent, utilities within 2,000 feet, and access to SR 93A within 1,000 feet
- legally available for the intended use (not prohibited by law, zoning, or other legal agreement)

Four alternatives were screened using the above criteria to determine which met the purpose and need. These alternatives included no action (continuing present activities at the existing facility), facility expansion at the existing location, a location to the north of Nevada state route (SR) 93A, and a location to the south of SR-93A (the proposed action). Only the proposed action met all of the criteria set forth by the City of West Wendover. The no action alternative and the proposed action were both considered in detail. The other two alternatives were not considered in detail because they did not have sufficient space (minimum five acres) to house all of the necessary equipment and workers, or were not legally available for the intended use. This screening process has been summarized on page 12 in Table 2 of the EA.

Under the proposed action, the City of West Wendover would construct a new public works facility on a 6.42 acre parcel to the south of SR 93A. The main structure would contain offices and a vehicle and equipment maintenance facility. The yard would provide fenced storage space for vehicles, equipment, and materials related to operation and maintenance of public water, sewer, road, trail, and garbage collection systems. Within the next five years, the city plans to construct additional sheds to provide covered storage for equipment and materials.

No Action Alternative (Figure 2, page 2 and EA Section 2.2.1, pages 10 to 11): Under the no action alternative, the City of West Wendover would continue present public works activities on the existing site with space limitations. The city would need to disperse equipment and materials to other locations for storage, requiring city employees to travel to those locations when gathering equipment and materials for any given task. The result would be longer durations related to those activities, and delays when emergency repairs to the city water and sewer systems are required. The no action alternative is the baseline for the rest of the analyses and helps determine the level of impact of each of the alternatives to the environment.

Proposed Action (Figure 2, page 2, Figure 3, page 11, and EA Section 2.2.2, pages 11 to 12): Under the proposed action (identified in the EA as the preferred alternative), the City of West Wendover would construct the proposed public works facility south of SR-93A, on a parcel of land comprising approximately 6.42 acres.

A single-story, medium bay facility (24-feet high) of approximately 5,000 ft² would be constructed. The building would consist of reinforced concrete footings, foundations, floor slab; an engineered steel structure with insulated steel wall panels; a standing seam metal roof; and fire detection/protection, heating, ventilation, and air conditioning systems. Supporting facilities would include a truck scale, an outdoor vehicle wash bay, fuel storage tanks, an oil-water separator, perimeter and interior fences, pavements, and site utilities. In the future, it is anticipated three engineered steel open face sheds would be required to store equipment and materials for the city's water, sewer, road, trail, and garbage collection systems (i.e., pipes, valves, fittings, concrete manholes and boxes, metal signs, posts, fencing, landscaping supplies, etc.).

The activities to be conducted at the new public works facility would include:

- maintaining vehicles and equipment;
- washing vehicles and equipment;

- space heating with a used oil furnace; and
- fuel, vehicle, tool, equipment, and material storage.

Environmental Impacts and Consequences

Resource areas unaffected by both of the alternatives that were therefore not considered in detail include cultural resources, soils and geology, occupational safety and health, and socio-economic resources (EA Section 1.7.3, pages 7 to 9).

Based on the analyses presented in this EA, no adverse or significant impacts were identified. A description of each resource area discussed in detail is now presented.

Air Quality (EA Section 4.1, pages 21 to 23): The proposed action is located in Elko County, Nevada. Elko County is in attainment status with federal clean air standards. Emissions of particulates smaller than 10 microns in diameter (PM-10) and particulates smaller than 2.5 microns in diameter (PM-2.5) would be produced as soil is disturbed during proposed construction activities. The US Environmental Protection Agency (EPA) has estimated that fugitive dust emissions from construction activities produce 0.11 tons of PM-10 per acre per month, and the PM-2.5 component equals approximately 10 percent of the PM-10 value. Assuming two months of scraping, grading, excavation, and backfill activities over a worst case area of approximately five acres, uncontrolled fugitive dust emissions of 1.1 tons of PM-10 and 0.11 tons of PM-2.5, respectively, were therefore calculated for the proposed action. Fugitive emissions from construction activities would be mitigated using a water truck during construction activities. Haul roads and other work areas would be kept wet. Any soil deposited on nearby paved roads by construction vehicles would be removed from the roads and returned to the site. The internal combustion engines of heavy equipment would generate temporary emissions of volatile organic compounds (VOCs), carbon monoxide (CO), oxides of nitrogen (NOx), PM-10, PM-2.5, hazardous air pollutants (HAPs), and oxides of sulfur (SOx).

Operating the proposed public works facility would produce air emissions related to operating the used oil furnace; welding; and fueling.

Water Resources (EA Section 4.2, pages 23 to 24): Based on discussions with design engineers, the land area to be disturbed would be greater than one acre but less than five acres in size. The proposed action would be covered under Nevada's general construction permit rule for stormwater compliance. Prior to initiating any construction activities, a permit would be obtained and erosion and sediment controls would be installed according to a stormwater pollution prevention plan. A retention basin would be constructed to ensure discharges during the construction period would not exceed pre-development flow rates. The same retention basin would ensure discharges during the operational period would not exceed pre-development flow rates. Design engineers have calculated the required volume of the retention basin to be 7,769 cubic feet.

The proposed action would allow approximately 12,000 gallons of oil (6,000 gallons each gasoline and diesel) to be stored on site in above ground tanks. The fuel tanks would be double-walled, providing their own secondary containment. Bollards would be installed around the

tanks to protect them from damage by vehicles using this area of the facility. The fuel tanks would be registered with the Nevada State Fire Marshal's office. An additional 300 gallons of hydraulic fluid would be stored on site, and 100 gallons of oil would be present in the tank that supplies fuel to the used oil furnace. These containers would also be provided with secondary containment. An SPCC plan would be required related to oil being stored in above ground tanks.

Biological Resources (EA Section 4.3, page 24): During construction of the proposed action, the sparse vegetation would be scraped and removed, and any small animals such as the reptiles and small mammals and birds would be displaced. Invasive species would be prevented from re-establishing themselves within the proposed project area using targeted spraying of herbicides. Because the site is small in relation to the surrounding area and consists of habitat that has been severely impacted by human activities, the loss of habitat would not be extensive.

With respect to operating the proposed action, no revegetation activities would be performed. Invasive species would be prevented from re-establishing themselves within the proposed project area using targeted spraying of herbicides. It has been the city's experience that invasive species outcompete native species, and the targeted spraying of invasive species would simultaneously prevent establishment of native species, for both operational and vacant portions of the property.

Solid and Hazardous Wastes (EA Section 4.4, pages 24 to 26): During the proposed construction activities, solid wastes expected to be generated would be construction debris consisting mainly of concrete, metal, and building materials. These items would be treated as uncontaminated trash. It is possible that equipment failure or a spill of fuel, lubricants, or construction related chemicals could generate solid or hazardous wastes. In the event of a spill of regulated materials, city managers and their contractors would comply with all federal, state, and local spill reporting and cleanup requirements. If excavated soils should exhibit suspicious odors or appearance, the following standard procedures would be followed. Samples from suspect wastes would be analyzed for hazardous vs. non-hazardous determination. The suspect wastes would be stored at sites operated in accordance with the requirements of 40 CFR 265 while analytical results are pending. Hazardous wastes would be labeled, transported, treated, and disposed in accordance with federal and state regulations. During the proposed construction activities, the site would be repeatedly cleared for unexploded ordnance and discarded military munitions as excavation activities proceed (approximately one clearance event per foot of depth). If such items should be suspected or observed, excavation activities would cease until the items have either been determined not to exist or have been safely removed from the site.

Operating the public works facility would produce waste from: vehicle equipment maintenance; welding; and office activities. Solid waste would be sent to the city landfill, approximately 7 miles southwest of West Wendover. These solid waste streams include brake pads (they do not contain asbestos), office trash, and paper towels. Used rags from maintenance and repair operations would be sent to Aramark industrial laundry services in Salt Lake City, Utah. On an annual basis, approximately 150 gallons of antifreeze (includes public drop off) and 150 gallons of oil that can't be burned due to presence of water or antifreeze (from public drop off) would be sent to Safety Kleen for proper recycling and/or disposal. All other liquids (approximately 1,500 gallons per year) are consumed as fuel in the used oil furnace, consisting of 1,000 gallons used oil and the remainder is diesel fuel.

No solid or liquid waste would be produced by use of chassis gear lubricant, lubricant sprays, or welding.

The outdoor vehicle wash bay would be equipped with a catch basin to trap sand and other settleable solids. Wastewater from the vehicle maintenance area would be routed through a two-chamber oil-water separator. All of these flows, and wastewater from the offices would be routed to the city's existing wastewater treatment plant. The inside of the oil-water separator and the catch basin would be visually inspected once per year, and the depth of accumulated solids in each would be determined by probing the chambers. At appropriate intervals, as determined during the inspections, contents of the oil-water separator and the catch basin, both solids and liquids, would be removed using a vacuum truck. Since petroleum regulated materials are expected, the removed materials would be transported, treated, and disposed in accordance with federal and state regulations.

Public Review and Interagency Coordination

The Nevada State Historic Preservation Office (SHPO) concurred with a finding of no effect after reviewing the proposed action. Hill AFB initiated a formal consultation process with 17 American Indian Tribes regarding the proposed action. The Navajo Nation and the Hopi Tribe concurred with Hill AFB's determination that construction of the proposed public works facility would not affect historic properties. No other responses were received.

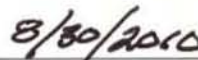
This EA was prepared jointly between the City of West Wendover, Nevada and the Air Force. A public notice was published in the Ogden, Utah *Standard Examiner* and the Elko, Nevada *Daily Free Press* on July 26, 2010, and in the Hill AFB *Hilltop Times* on July 29, 2010. Copies of the Proposed Final EA and Draft Finding of No Significant Impact were made available for review and public comment at Hill AFB and the City of West Wendover offices. No public comments were received at the conclusion of the public comment period. No agency comments were received.

FINDING OF NO SIGNIFICANT IMPACT

Based upon my review of the facts and analyses contained in the attached EA and as summarized above, I find the proposed action (identified in the EA as the preferred alternative) to construct the new City of West Wendover public works facility will not have a significant impact on the natural or human environment; therefore, an environmental impact statement is not required. This analysis fulfills the requirements of NEPA, the President's Council on Environmental Quality, and 32 CFR Part 989.



PAUL A. PARKER, SES
Command Civil Engineer
Communications, Installations
and Mission Support



Date