PROJECT SUMMARY
HOPI ARSENIC MITIGATION PROJECT
TRIBAL CONTRIBUTION
HOPI INDIAN RESERVATION
NAVAJO AND COCONINO COUNTIES, ARIZONA

PROJECT NO. PH 14-U62
PUBLIC LAW 86-121

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
PUBLIC HEALTH SERVICE
INDIAN HEALTH SERVICE
PHOENIX AREA OFFICE

JUNE 2014

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INTRODUCTION

In November 2010, the Hopi Tribe requested the Indian Health Service's (IHS) assistance to advance an arsenic mitigation strategy to address water quality issues affecting residents of the First and Second Mesas on the Hopi Indian Reservation. The Tribe has received an Environmental Protection Agency (EPA) Drinking Water Tribal Set-Aside grant to assist in the construction of the Hopi Arsenic Mitigation Project.

It is proposed in this project to begin construction of the HAMP, starting in the vicinity of Upper Sipaulovi and Upper Mishongnovi. Total estimated cost of the scope of work of this Project Summary is $985,000. The EPA is contributing all project funding for this work through an EPA-DWTSA grant.

EXISTING SANITATION FACILITIES

Water Supply: In January 2001, the USEPA reduced the drinking water MCL for arsenic from 50 ppb to 10 ppb. Effective January 2006, all public water systems were required to meet this revised standard. Since 2006, the tribal water systems serving the Hopi Villages of First and Second Mesa have been out of compliance with regard to arsenic. Arsenic concentrations in the First and Second Mesa area range from approximately 12 ppb to 20 ppb.

Three of the affected villages (Shungopavi, Sipaulovi, and the FMCV) signed Compliance Plans with the USEPA, Region 9, in 2011, agreeing to bring their respective water systems into compliance with the arsenic MCL by January 23, 2015.

In June 2006, the Hopi Tribe received a USEPA Drinking Water Tribal Set-Aside grant to develop a feasibility study to explore arsenic mitigation compliance strategies (IHS Project PH06-D33). Through an MOA, the Hopi Tribe requested that the Indian Health Service assist the Tribe in completing an arsenic mitigation study for the First and Second Mesa region. Based on the findings of this investigation, the IHS recommended that arsenic treatment options be avoided to the greatest extent practical and that the arsenic mitigation focus should be directed to non-treatment options. Conveying arsenic compliant water from a proposed well field in the Turquoise Trail region was deemed the preferred strategy for addressing the area's ongoing arsenic

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compliance challenges. This concept became known as the Hopi Arsenic Mitigation Project.

In 2008, the IHS funded a project to further assist the Tribe in developing the HAMP concept (IHS Project PH08-T38). The project was funded specifically to evaluate the existing Hopi water systems, determine pipeline routes and alignments, identify right-of-way issues, and to conduct an environmental assessment of the HAMP.

In 2010, the Tribe received a DWTSA grant for $ 1.9M (IHS Project PH10-E37), through an Inter-Agency Agreement with the IHS, to further explore and substantiate the HAMP concept. The scope of work defined in the 2010 DWTSA grant included a hydrogeologic study, a utility management plan, and well drilling activities in the Turquoise Trail area.

In 2011, the USEPA awarded the Tribe another DWTSA grant, for $1.1M (IHS Project PH11-E55), and in 2012 awarded the Hopi Tribe an additional DWTSA grant for $1.2M (IHS Project PH 12-E73), which provided funding for additional planning activities and construction funding for a portion of the HAMP.

USEPA has been actively funding the HAMP with the goal of assisting the Tribe in implementing a long-term sustainable arsenic compliance solution. The IHS and the Hopi Water Resources Program, with support from the Tribe, have been actively engaged in advancing the project through public outreach, planning, and preliminary engineering activities. The IHS is committed to assisting the Tribe with engineering and technical support. The HAMP scores high in the IHS Sanitation Deficiency System, but is beyond IHS funding capabilities to fund in its entirety.

Shungopavi – The existing Shungopavi water system consists of one well producing approximately 65 GPM and one 250,000-gallon elevated water storage tank. One pressure zone serves the entire village with pressure being provided by the elevated storage tank. A new well was drilled in Shungopavi in 2008, which exhibited high arsenic concentrations of 33 ppb. The well was subsequently never put into service.

The Shungopavi water system currently serves 146 residential service connections, no commercial, and three "other" water service connections.

Upper Mishongnovi/Sipaulovi – The Upper Sipaulovi/Mishongnovi water system consists of two pressure zones, one well which produces approximately 9 GPM, one 16,000-gallon water storage tank and one hydropneumatic tank with a corresponding booster pump.

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The Upper Sipaulovi/Mishongnovi water system currently serves 25 residential service connections, no commercial, and one "other" water service connection.

Lower Mishongnovi/Sipaulovi - The Lower Sipaulovi/Mishongnovi water system consists of one well which produces approximately 90 GPM, a 75,000-gallon water storage tank, and a gravity-fed distribution system. The distribution system is connected with the BIA SMDS water system, through a normally closed gate valve, allowing emergency service to the SMDS, as needed.

The Lower Sipaulovi/Mishongnovi water system currently serves 100 residential service connections, three commercial, and five "other" water service connections

Polacca (First Mesa Consolidated Villages, FMCV) - The existing FMCV water system spans four pressure zones. Drinking water for the entire system is currently produced from two functioning wells, which are identified as Wells #6 and #8. These wells each have capacities of approximately 100 GPM. Wells #1, 2, 3 and 4 have been abandoned, and wells #5 and 7 are currently not in use. Pressure zone #1 is the uppermost zone and services the homes on top of the mesa. Subsequent zones are labeled in order of decreasing elevation. Pressure zone #1 has an 8,000 gallon storage tank and a 1,000 gallon hydropneumatic tank with a corresponding booster pump. Pressure zone #2 consists of a 500,000 gallon "floating" water storage tank (Polacca East Tank) fed by well #8 and provides service to a few higher elevation homes located below the mesa. Pressure zone #2 feeds pressure zone #3 through two pressure reducing valves (PRV #8 and #9) and generally serves the majority of Polacca homes north of Highway 264. Pressure zone #3 feeds pressure zone #4 through a series of five PRVs (PRVs #6, 4, 3, 2, 1) located along and just north of Highway 264. Pressure zone #4 generally serves homes south of Hwy 264 and east of the Hospital/Polacca West System which is served by the 200,000 gallon Polacca West Tank, Well #5, and, in back-up mode, by pressure zone 3 through PRV #7. Water is boosted from pressure zone #2 up to pressure zone #1 via a small duplex booster pump station.

The FMCV water system currently serves 580 residential service connections, 19 commercial, and 21 "other" water service connections.

B. Wastewater Disposal: Wastewater collection and disposal on the reservation is accomplished through a number of different methods. Seven of the villages have collection systems while only six operate disposal facilities. At Keams Canyon, the BIA operates both a collection system and disposal facility. Two of the schools have both a collection system and disposal facility and one school has only a collection system. Two Tribal facilities exist for collection and disposal. Most scattered

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homes are served by septic tank and drainfield systems. Outhouses are used extensively in older village areas.

Second Mesa School - Wastewater disposal for the school compound and surrounding houses consists of a 1.0 acre stabilization pond. The Mishongnovi-Sipaulovi pond also provides wastewater disposal for part of Toreva.

Polacca (First Mesa Consolidated Villages, FMCV) - The FMCV's wastewater disposal system includes a six cell lagoon treatment system totaling 9.9 acres, with 14.8 acres of wastewater disposal area, making the total area of the wastewater treatment facility 24.7 acres. The facilities serve approximately 450 homes and 10 businesses.

C. Solid Waste Disposal: The Hopi Tribe, in conjunction with the IHS and a HUD Community Development Block Grant (CDBG), has developed a solid waste disposal program for the entire Reservation. A RCRA compliant landfill has been designed and constructed, and is now in operation on the Reservation.

RECOMMENDED FACILITIES

A. Water: The scope of work for this project includes commencement of construction of the Hopi Arsenic Mitigation Project.

The HAMP, as proposed, is a regional drinking water project that encompasses construction of a remote well field, regional water storage tanks, in-line booster pump station, and corresponding transmission pipelines, to convey water from the remote well field to the villages of First and Second Mesa. The proposed Turquoise Trail well field is located approximately 14 miles north of the Hopi Cultural Center in the vicinity of Route 8029 "Turquoise Trail". Water would be delivered to each of the affected villages via a pipeline/transmission system. The IHS commissioned a study known as the Hopi Water System Strategic Plan to estimate the operational costs of the proposed regional water system and to evaluate potential regional utility organization models. A new utility authority, the Hopi Public Utility Authority, has been established to manage and operate the proposed facilities. Each Village will maintain ownership of, and continue to operate and maintain, their respective water distribution systems, and will purchase bulk water from the proposed regional utility through a master water meter. In this model, the HPUA will act as a water wholesaler to the villages. Villages may be given the option of turning over their respective facilities to the regional utility authority under some future arrangement.

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B. Sewer: No wastewater disposal facilities are recommended under this Project. Projects are underway or are being planned to improve sewer facilities on the Reservation.

C. Solid Waste: No solid waste facilities are recommended under this Project. Existing facilities are adequate.

ENVIRONMENTAL CONSIDERATIONS

IHS conducted an environmental review of the scope of work under this project in accordance with IHS environmental review policies. The review indicates that an environmental assessment is required for the greater regional project. The environmental assessment funded under IHS project PH 11-E55 will be completed prior to the commencement of construction.

OPERATION AND MAINTENANCE (O&M)

The proposed facilities constructed under this project will be operated and maintained by a Tribally endorsed management entity to be defined in the "Hopi Water System Strategic Plan". The strategic plan was funded by EPA in 2010 under Project PH 10-E37 and is currently in final draft form, with an estimated completion timeframe of August 1, 2014. The strategic plan will clearly define how the proposed facilities will be operated and maintained.

COST ESTIMATE

Total estimated cost to construct the HAMP is estimated to be $16.914 million. This contribution toward the HAMP project is being funded through the Hopi Tribe form its EPA-DWTSA grant. It is anticipated that construction will be completed by the Tribe through Tribal procurement. However, it is also possible that construction will be completed via government contracting. IHS will work with the Tribe to determine and execute construction through the preferred procurement method. Any work to be constructed through Tribal procurement will be approved in accordance with the MOA. Architectural and engineering consultant services may be invoked for certain aspects of the project. Such consultant services may be obtained through Tribal procurement or an IHS government contract.

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UPPER SIPAULOVI/MISHONGNOVI 2014 DWTSA HAMP COST ESTIMATE

Schedule A: Project Planning & Design

Item	Description	Quantity	Units	Units Cost	Total
1	Geotechnical investigation (as needed for WST)	1	LS	$ 25,000.00	$ 25,000.00
				Planning & Design Total:	$ 25,000.00

Schedule B: Construction

Item	Description	Quantity	Units	Units Cost	Total
2	6" Water Main, 235 PSI rated	10,000	LF	$ 30.00	$ 300,000.00
3	6" Gate Valves	7	EA	$ 1,500.00	$ 10,500.00
4	Air Relief Valves	2	EA	$ 2,750.00	$ 5,500.00
5	Altitude Valve & Vault	1	EA	$ 30,000.00	$ 30,000.00
6	110,000 gallon Water Storage Tank	1	LS	$ 165,000.00	$ 165,000.00
7	Master Meter	1	EA	$ 10,000.00	$ 10,000.00
8	Road Excavation and Repair - Unpaved Open Cut	2,400	LF	$ 26.00	$ 62,400.00
9	Paved Road Crossing - Bore with Casing	150	LF	$ 480.00	$ 72,000.00
10	Sipaulovi/Mishongnovi Disinfection Facility	1	EA	$ 30,000.00	$ 30,000.00
11	Power Extension to Disinfection Facility	1	EA	$ 15,000.00	$ 15,000.00
				Construction Total:	$ 700,400.00

Planning & Design Total (Schedule A)		$ 25,000.00	
Construction Total (Schedule B)		$ 700,400.00	
O&M Support Total (Schedule C)		$ -	
Contingency (Schedules A, B, & C)		$ 72,540.00	10.00%
		Subtotal	$ 797,940.00
TERO/Tribal Tax	0.5%	$ 3,989.70	
Tribal Procurement 1=YES, 0=NO	1		
Tribal Administrative Support Fee		$ 15,958.80	
		Subtotal Tribal Fees	$ 19,948.50
PROFESSIONAL FEES:			
IHS Engineering Program Support (EPS)		$ 47,876.40	6.00%
		Subtotal Professional Fees	$ 47,876.40
IHS Project Technical Support Fee (PTS)		$ 119,691.00	15.00%
		Subtotal PTS	$ 119,691.00
		Total Phase Cost	$ 985,455.90
		Rounded	$ 985,000.00

PH 14-U62 COST SUMMARY:

Maximum Contribution to Tribe	$817,433
IHS Project Technical Support	$119,691
IHS Engineering Program Support	$ 47,876
Total	$985,000

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NAVAJO AND COCONINO COUNTIES, ARIZONA

PROJECT NO. PH 14-U62
PUBLIC LAW 86-121

PREPARED BY:

8 Aug 2014
Date

Adam Hughes, P.E.
Project Engineer

REVIEWED BY:

8-8-14
Date

Robert Lorenz, P.E.
District Engineer

APPROVED BY:

8/18/14
Date

Eric Matson, P.E., Acting Director
Division of Sanitation Facilities
Construction

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ENVIRONMENTAL INFORMATION AND DOCUMENTATION

Tribe: The Hopi Tribe	Reservation: Hopi Indian
Project, Program, Grant Description & Location:	Hopi Arsenic Mitigation Project Tribal Contribution, IHS Project PH14-U62, with PH11-E55, PH04-S63, PH06-D33, PH08-T38, PH10-E37, and PH12-E73, Public Law 86-121, Hopi Indian Reservation, Navajo County, Arizona.

Action includes purchasing, construction, alteration, renovation, or leasing activities, new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by the Indian Health Service.

Note: A "Yes" or "No" response is required for every question. Answer each item completely with adequate supporting information to justify your response.
Depending upon the context and intensity, any consideration listed below can result in an Environmental Assessment .

Consideration	Will the proposed action/activity affect the Consideration? Provide supporting information for your responses and explain any mitigations to be implemented.
1. Will the proposed action result in a known violation or continuance of a violation of applicable (Federal, Tribal, State or local) laws or requirements for protection of environment or public health and safety?	No -All applicable Federal or Tribal laws will be complied with on this project as per project summary and Environmental Assessment. The project will not violate any requirements imposed for protection of environment or public health and safety. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
2. Will the proposed action result in a conflict with existing or proposed Federal, Tribal, state, and local land use plans?	No - The proposed project will comply with existing land use plans. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
3. Is there a controversy with respect to environmental effects of the proposed action based on reasonable and substantial issues?	No -- The proposed project is intended to provide drinking water that meets EPA's Safe Drinking Water Act standards for arsenic and other primary contaminants for the villages of First and Second Mesa. While there could be controversy, none is apparent at the present time. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
4. Is the proposed action significantly greater in scope than normal for the area or does it have significant unusual characteristics?	Yes - The scope of this project is very large, with a current total cost estimate of $20 million and a large geographic area impacted. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
5. Does the proposed action establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	No - The project will not set a precedent or decision in principle for future actions and presents nothing unusual or new in its technology. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
6. Does the proposed action have significant adverse direct or indirect effects on park land, other public lands, or areas of recognized scenic or recreational value? (For example, consider how your activity will affect the view?)	No - The proposed action will not result in any changes to the scenic integrity of the area. Scenic and recreational values are being considered through village and tribal consultations in both the project design and Environmental Assessment . PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer

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Action includes purchasing, construction, alteration, renovation, or leasing activities, new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by the Indian Health Service.

Consideration	Will the proposed action/activity affect the Consideration? Provide supporting information for your responses and explain any mitigations to be implemented.
7. Does the proposed action include construction of a new municipal solid waste landfill at a new solid waste disposal site?	No – Project does not involve construction of a solid waste disposal landfill. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
8. Will the proposed action create a need for additional capacity at solid waste disposal facilities?	No – Solid waste from the project will be minimal and will be disposed of at licensed solid waste disposal landfills. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
9. Does the proposed action include construction of a new wastewater treatment facility that will discharge treated sewage effluent to the waters of the U.S.?	No – The proposed project will provide drinking water that meets EPA's Safe Drinking Water Act standards for arsenic and other primary contaminants for the villages of First and Second Mesa. Project does not include construction of wastewater treatment facilities. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
10. Will the proposed action create a need for additional capacity at wastewater treatment facilities?	No – The project is not expected to have an effect on wastewater flows. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
11. Will the proposed action create a need for additional capacity in the drinking water supply?	No – The project will create additional capacity in the drinking water supply, which is needed by several of the First and Second Mesa villages. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
12. Are there other considerations about the proposed action that could adversely affect the environment and/or public health and safety?	No – Proposed project is intended to improve environment and/or public health and safety by reducing arsenic levels in drinking water. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
13. Will the proposed action create a need for additional capacity in health care facilities and for health care services?	No - PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer

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Consideration	**Will the proposed action/activity affect the Consideration?** Provide supporting information for your responses and explain any mitigations to be implemented.
14. Will the proposed action create a need for additional energy supply or generation?	No – The regional power supply is adequate for this project. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
15. Will the proposed action create a need for additional capacity in educational facilities?	No - PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
16. Will the proposed action create a need for additional capacity in transportation systems?	No - PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
17. Historic Preservation: a. Does the proposed action involve the purchase, construction, alteration, renovation, or lease of real property or portion of real property that is more that 50 years old?	No - DOCUMENT: PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
b. Will the proposed action adversely affect properties listed, or eligible for listing, on the National Register of Historic Places? [Buildings, archaeological sites, National Historic Landmarks; objects of significance to a Tribe including graves, funerary objects, and traditional cultural properties. For assistance, consult with the State Historic Preservation Officer (SHPO) or the Tribal Historic Preservation Officer (THPO)])	No - The IHS and Hopi Tribe have conducted Cultural Resources Surveys of all project areas prior to any construction to minimize disturbance of Traditional and Cultural properties. IHS is consulting with the Tribe, Villages, two other Tribes with a cultural affiliation for this area and AZ SHPO prior to construction. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer

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Action includes purchasing, construction, alteration, renovation, or leasing activities, new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by the Indian Health Service.

Consideration	**Will the proposed action/activity affect the Consideration?** Provide supporting information for your responses and explain any mitigations to be implemented.
18. Endangered Species Act: Is the proposed action likely to adversely affect a plant or animal species listed on the Federal or applicable state list of endangered or threatened species or a specific critical habitat of an endangered or threatened species? (Consult with Fish & Wildlife Service or NOAA Fisheries Service. Discovering an endangered or threatened species in the project area will stop the project, and the Endangered Species Act has significant fines and penalties for violations.)	No - IHS and the Hopi Tribe, Department of Natural Resources have conducted literature and field surveys to determine the potential for impact to endangered species in the project area. There are no anticipated impacts to ESA listed species or critical habitat. IHS will consult with U.S. Fish and Wildlife Service if the project may affect a listed species. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
19. Will the proposed action require major sedimentation and erosion control measures? (Consider earth disturbing activities including construction or expansion of a parking lot.)	No – Proposed project will comply with BMP's and secure a storm water permit from EPA and water quality certification from the Hopi Tribe. PRINTED MATERIAL-HAMP Environmental Assessment, Joshua Van Vleet, Project Engineer
20. Will the proposed action violate a storm water permit or a wastewater discharge permit either for construction or on-going operations? (Earth disturbing activities may require a Notice of Intent (NOI) to be covered under a storm water general permit or individual permit from the EPA or other agency and a storm water control plan, including some parking lot construction activities. A discharge of wastewater to the environment may require a permit from Tribal, local or state authorities, or EPA.)	No – Proposed project will comply with BMP's and secure a storm water permit from EPA and water quality certification from the Hopi Tribe. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
21. Safe Drinking Water Act: Will the proposed action impact an EPA designated sole source aquifer? (Designation of sole source aquifer puts restrictions and conditions on Federal expenditures, projects, and grants.)	No – There are no designated sole source aquifers on the Hopi Reservation. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer

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Action includes purchasing, construction, alteration, renovation, or leasing activities, new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by the Indian Health Service.

Consideration	**Will the proposed action/activity affect the Consideration?** Provide supporting information for your responses and explain any mitigations to be implemented.
22. Wetlands and Water Resources (lakes, rivers, ponds, streams, etc.): Will the proposed action violate a Section 404 (Clean Water Act) permit for actions in a wetland and/or Section 10 (Rivers and Harbors Act) permit for actions in a stream or river? (Activities in or near a wetland or river may require a permit from the U.S. Army Corps of Engineers or U.S. Coast Guard. Includes: construction in or near any wet or dry waterway, stream crossings, intake structures, outfalls, etc.)	No – The project will comply with NWP #12 for all three jurisdictional areas impacted. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
23. Floodplains: a. Is the proposed action located in either a 100-year or, for critical actions, a 500-year floodplain? (If Flood Insurance Rate Maps do not exist for the project site, a floodplain survey or consultation may be required. Also may need to consider if the facility will require flood insurance).	**Yes** - FEMA Flood Plain Maps are not available for the Hopi Indian Reservation. The project crosses three flood prone washes and flood studies have been completed. The project will have no adverse impact on floodplains. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
b. Will the proposed action adversely impact flood flows in a floodplain or support development in a floodplain?	**No** - PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
24. Existing site: Would the proposed action, involving the purchase, construction or lease of **new** facilities (including portable facilities and trailers), substantially increase the capacity of an **existing** health care facility?	**No** - PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
25. New site: Does the proposed action involve purchase, construction, or lease of **new** facilities (including portable facilities and trailers) where such action is for buildings equal to or more than 12,000 square feet (1080 square meters) of useable space when more than 5 acres (2 hectares) of surface land area are involved at a **new site**?	**No** - PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer

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Action includes purchasing, construction, alteration, renovation, or leasing activities, new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by the Indian Health Service.

Consideration	**Will the proposed action/activity affect the Consideration?** Provide supporting information for your responses and explain any mitigations to be implemented.
26. New site: Does the proposed action involve purchase, construction, or lease of health care facilities (other than buildings) for projects equal to or more than 5 acres (2 hectares) of surface land area at a **new site**?	No – PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
27. Does the proposed action involve the sale or transfer of real property, on which any hazardous substance was stored for one year or more, known to have been released, or disposed of? (Provide relevant documentation for any hazardous substance releases. See 40 CFR 373.2(b), 302.4, and 261.30 for reportable quantities.)	No - – PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
28. Does the proposed action involve the sale or transfer of real property, on which underground or above ground storage tanks are located?	No - PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
29. Will the proposed action violate Tribal, local, state, or Federal law on the use and storage of hazardous substances or the transportation, storage, and disposal of hazardous wastes or medical wastes? (Activities that may generate reportable quantities include air conditioning repair and service, pesticide application, motor pools, automobile repair, welding, landscaping, agricultural activities, print shops, hospitals, clinics, medical centers, etc. Repair, renovation, or demolition activities can generate waste that has asbestos-containing materials, asbestos, lead-based paint, PCBs, CFCs, etc.)	No - The proposed action does not violate Tribal, local, state, or federal law on the use and storage of hazardous substances or the transportation, storage, and disposal of hazardous wastes or medical wastes. All applicable laws and requirements will be complied with on this project. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
30. Will the proposed action adversely affect community air pollution for a long period of time? (Consider if your activity must conform to an applicable air quality implementation plan.)	No - The proposed action will not adversely affect community air pollution for a long period of time. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer

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Action includes purchasing, construction, alteration, renovation, or leasing activities, new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by the Indian Health Service.

Consideration	**Will the proposed action/activity affect the Consideration?** Provide supporting information for your responses and explain any mitigations to be implemented.
31. If the proposed action is implemented, will it have a disproportionately high and adverse human health or environmental impact on the Tribe, low-income populations, or minority populations?	No - The proposed action does not create any hazards nor expose anyone to adverse environmental conditions. Project is intended to improve environmental health in the area. – PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
32. Will the proposed action adversely affect community noise levels?	No - The proposed action may result in minimal short term increased noise levels with the mobilization of heavy equipment but no long term noise levels will result from the completed project. – PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
33. Wilderness Act: Will the proposed action adversely impact a Wilderness Area? (Wilderness Areas are specifically designated areas of land.)	No - There are no designated Wilderness Areas on the Hopi Indian Reservation as per Wilderness Act (16 USC 1131-1136) Printed Resource: http://www.blm.gov/az/wildarea.htm
34. Farmland Protection Policy Act: Will the proposed action convert significant agricultural lands to non-agricultural uses and exceed 160-point score on the farmland impact rating?	No - No significant agricultural lands will be crossed. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer
35. Coastal Zone Management Act: Will the proposed action directly affect a Coastal Zone in a manner inconsistent with the State Coastal Zone Management Plan? (All Federal programs or projects in the coastal zone must comply with the consistency provisions of the Act. Each coastal state should have a state office to manage its coastal zone development and use.)	No - The Hopi Indian Reservation has no designated "coastal zones" as per CZMA (16 USC 1451-1464) http://www.law.cornell.edu/uscode/html/uscode16/usc_sup_01_16_10_33.html. PRINTED MATERIAL-HAMP Environmental Assessment, Adam E. Hughes, PE, Project Engineer

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Tribe: The Hopi Tribe	Reservation: Hopi Indian
Project, Program, Grant Description & Location:	Hopi Arsenic Mitigation Project Tribal Contribution, IHS Project PH14-U62, with PH11-E55, PH04-S63, PH06-D33, PH08-T38, PH10-E37, and PH12-E73, Public Law 86-121, Hopi Indian Reservation, Navajo County, Arizona.

Action includes purchasing, construction, alteration, renovation, or leasing activities, new and continuing activities, including projects and programs entirely or partly financed, assisted, conducted, regulated, or approved by the Indian Health Service.

Consideration	Will the proposed action/activity affect the Consideration? Provide supporting information for your responses and explain any mitigations to be implemented.
36. Wild and Scenic Rivers Act: Will the proposed action adversely affect a wild, scenic, or recreational river area or create conditions inconsistent with the character of the river? (A consideration for activities that are in or near any wild and scenic waterway including construction of stream/river crossings, intake structures, outfalls, etc.)	No - The proposed action will not affect a wild, scenic, or recreational river area. To date, Congress has not designated any rivers on the Hopi Indian Reservation under this category. (WSRA; 16 USC 1271-1287), Printed Resource Review: http://www.rivers.gov/wildriverslist.html#az http://www.law.cornell.edu/uscode/html/uscode16/usc_sup_01_16_10_28.html

Based on the available record, the IHS has made the following determination on the proposed activity/action/undertaking. The record was examined to identify potential extraordinary or exceptional circumstances which would require further environmental review. (State if an Environmental Impact Statement or Environmental Assessment is needed, or which Categorical Exclusion applies to this activity/action/undertaking).

The project is not categorically excluded, in accordance with Federal Register, Vol. 58, No. 3, January 6, 1993, Exclusion J, "Construction of Sanitation Facilities" and an Environmental Assessment and draft FONSI have been prepared.

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ENVIRONMENTAL INFORMATION AND DOCUMENTATION

Tribe: The Hopi Tribe	Reservation: Hopi Indian
Project, Program, Grant Description & Location:	IHS Project PH11-E55, with PH04-S63, PH06-D33, PH08-T38, PH10-E37, and PH12-E73, Public Law 86-121, Hopi Indian Reservation, Navajo County, Arizona

I certify that to the best of my knowledge and ability the information presented herein is true and correct (enter appropriate information in the shaded blanks):

Signature	Name and Title	Date
(1) AEHughes	Project Engineer ADAM E. HUGHES, P.E.	8 Aug 2014
(2)	District Engineer, Eastern Arizona District ROBERT LORENZ, P.E.	8·8·2014
(3)	Director, Division of Sanitation Facilities Construction ERIC MATSON, P.E.	8/18/14
(4)	NEPA Coordinator JOHN HAMILTON, P.E.	
(5)	Associate Director, Area OEHE MIKE WELCH, R.E.H.S..	

*Signatories may vary at the IHS Area. At minimum, signatures (1) through (5) are required.

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