

ENVIRONMENTAL ASSESSMENT
COMMUNITY SEWAGE DISPOSAL FACILITIES
Tuba City WWTP Upgrades NTUA Phases I and II

To’Nanees’Dizi Chapter, Navajo Nation
Coconino County, Arizona

Indian Health Service
Project Nos.
NA-25-XY7 and NA-26-MJ4

Public Law 86-121



U.S. Department of Health and Human Services
Indian Health Service
Office of Environmental Health and Engineering
Division of Sanitation Facilities Construction
Navajo Area Indian Health Service
Window Rock, Arizona

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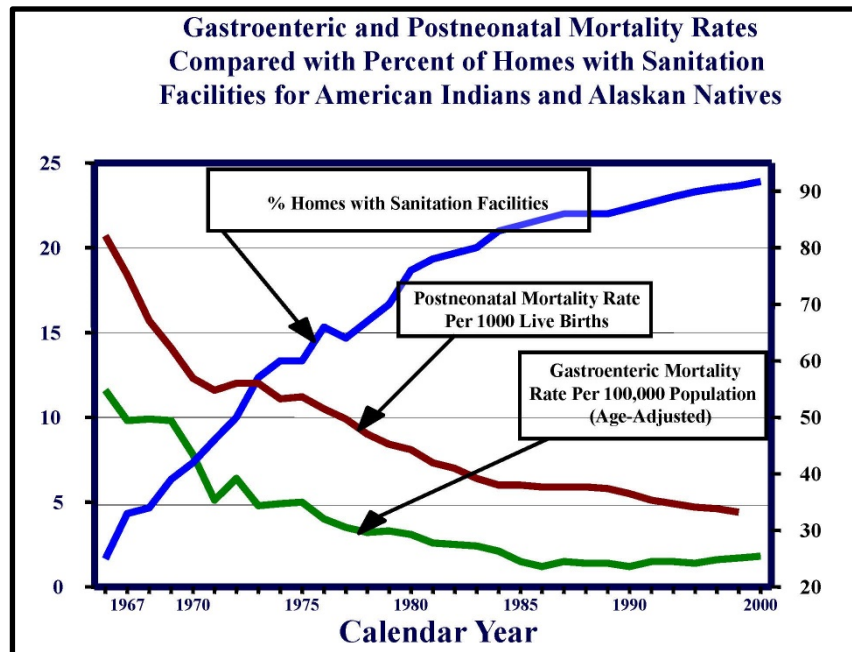
1.0 PURPOSE AND NEED

1.1 Purpose, Need and Authorization for Project

Human settlement and civilization require access to sanitation facilities including a reliable source of clean water. On Native American Indian reservations, settlement occurs according to U.S. Government land assignment. On the Navajo Nation, this results in widespread and isolated settlement absent essential resources. In addition to land, the government provides health care to Native Americans. This service identifies disparity between health conditions among Native Americans and non-native U.S. citizens. Infant and elderly death rate due to water-borne illness is dramatically

disproportionate among Native Americans living on reservations. The delivery of in-home potable drinking water and sewage disposal facilities is directly responsible for reducing this disparity. As part of the U.S. Native American health care package, the government mandates through the Indian Sanitation Facilities Act of 1959, P.L. 86-121, the delivery of sanitation facilities to “dry” Native American homes. The U.S. Public Health Service, Indian Health Service has

stewardship to implement the law. The Navajo Area Indian Health Service (NAIHS), Division of Sanitation Facilities Construction (SFC) identifies deficient homes and communities within the



Navajo Nation and recommends remedy projects, secures funding and materials, and provides engineering services and management for project construction. The NAIHS is responsible for completing agency National Environmental Policy Act (NEPA) requirements on IHS Project(s) NA-25-XY7, NA-26-MJ4, and a yet unnamed 2026 EPA project, including this Environmental Assessment (EA). The US Bureau of Indian Affairs (BIA) approves Right-of-Way (ROW) for SFC project corridors on Navajo Nation trust and allotted lands. Selected Tuba City Wastewater Treatment Plant (WWTP) upgrades will require additional right-of-way.

IHS Project construction is typically completed by the Navajo Nation-owned Navajo Engineering and Construction Authority (NECA); however, this project will be completed by hiring out a construction firm by the Navajo Nation-owned Navajo Tribal Utility Authority (NTUA). Project facilities are operated and maintained by the Navajo Nation as outlined in the Project Memorandum of Agreement (MOA). Most systems, including the WWTP are operated by the NTUA.

The purpose of construction is to ease negative environmental health conditions including economic hardship, disadvantaged population, pandemic conditions, etc. Navajo Nation Covid 19 infection death rates were linked to the absence of clean water and access to proper hand hygiene. Currently, violations of US Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) standards at the WWTP occur daily will be addressed by this IHS project.

Project NA-25-XY7 and NA-26-MJ4 participants scheduled to receive service are connected to the community water supply and sewage disposal facilities. Other community members manage water delivery and sewage disposal through any available means. Many haul water and use pit privies. This latter mode of water delivery occurs with little regard for National Environmental Policy Act (NEPA) considerations. During government-issued lockdown, curfew, and deadly infection, Navajo Nation residents venture to obtain water. Topsoil erosion, sediment track-out, fuel and oil pollution, etc. result presently as disintegrating passenger vehicles are the primary water delivery means. Mud conditions during times of precipitation require vehicles to expand the roadway, take alternate roads, or blaze new overland routes destroying sensitive habitat and harming threatened and endangered species. Protected historic properties are damaged due to water hauling vehicle traffic. NAIHS considers P.L. 86-121 and NEPA and works to achieve a net positive effect on Navajo Nation health.

1.2 Proposed Project

On September 29, 2016, NTUA received an EPA Administrative Order on Consent (AOC) that requires NTUA to cease current and prevent future NPDES violations on permit No. NN0020290. WWTP effluent discharge has failed to meet standards set forth in the permit. One to four months of the year since 2010, the WWTP exceeds Biological Oxygen Demand (BOD), pH, total residual chlorine (TRC), and total ammonia measured by the ammonia impact ratio (AIR). This poses human health and environmental risks for the community.

TRC improvements have been achieved at the WWTP over the last decade that reduced violations, but the WWTP regularly violates other limits mentioned. In 2021, the EPA directly awarded the

NTUA a grant for \$1,380,720 through its Clean Water Indian Set-Aside (CWISA) program to complete the design of a permanent replacement facility. Planning and design phases are currently under way and are near completion.

On August 20, 2024, Brown and Caldwell Consulting Engineers provided a Preliminary Engineering Report (PER) to the NTUA that evaluated three alternatives to address permit violations. The do-nothing alternative and enhanced nutrient removal with existing equipment were ruled out. The preferred option replaces the entire lagoon treatment system patterned after similar Window Rock WWTP replacement.

In 2024, the NTUA agreed to a Partial Consent Decree (PCD) with EPA and the U.S. Department of Justice to complete a project and correct compliance requirements within a certain time frame. The project description includes the replacement of the WWTP. The NTUA relies on grants, loans, fees and/or assessments to pay for the project.

The Navajo Nation requested the project to provide sanitation facilities for homes that are located within the To'Nanees'Dizi Chapter and to indicate Tribal priority. A Project Proposal from the Chapter is pending.

The project will construct an extended aeration facility that includes an anoxic selector, aeration basins, clarifiers, aerobic digesters, and emergency power supply. The proposed facility has a 20-year design capacity of 1.3 million gallons per day (MGD). For sludge management, a belt filter press and sludge storage pad are recommended. The project facility will include a new administration building and new maintenance building for equipment storage and repairs. For disinfection, a new ultraviolet (UV) disinfection system is recommended.

Total cost of this project is estimated at \$64,741,740 (subtracting out EPA Ineligible Costs). The IHS, through IJA Funds Project NA-26-MJ4, will provide funding in the amount of \$38,197,627 towards the construction and Project Technical Support of the proposed wastewater plant system upgrades. The EPA, under the Clean Water Act, will provide Clean Water Indian Set-Aside (CWISA) funds in the amount of \$14,370,130 to the project with an anticipated amount in FY 2026 for \$8,807,413 and possible more. The FY 2026 EPA Project will incorporate this EA by reference. Additional contribution funds will be provided by the NTUA through a United States Department of Agriculture (USDA) grant or other Navajo Nation funds for the balance of the project. The IHS will manage the IHS and EPA funds under the authority of Public Law 86-121. The NTUA will manage the Navajo Nation funds and the construction of this project.

1.3 Location and Topography of the Project Area

Tuba City is in north central Arizona, 1 mile north of Highway 160 and 12 miles east of Highway 89. Tuba City lies directly north of the Hopi village of Moenkopi. The geomorphology of the region includes canyons and plateau areas. Elevations are approximately 4,000-feet in the low-lying areas to approximately 6,000-feet on the mesas. Gently sloping valleys partially filled with blow sand at the lower elevations, and pinon pine covered ridges at the higher elevations characterize the topography of the area. Sandstone outcrops are evident throughout the area and contribute to construction problems.

The overall climate is arid with average annual precipitation of 6.7 inches and an average annual lake evaporation of 62 inches. Temperatures are typically moderate to cool, with average day-time highs in the summer around 95-degrees Fahrenheit and average low temperatures in the winter of approximately 24-degrees Fahrenheit.

Homes located in the project area are conventional wood frame structures, concrete block construction, or modular homes. The NTUA and Arizona Public Service (APS) provide electrical power. Homes largely use liquid propane gas or wood burning stoves for heating purposes.

The population of Tuba City is approximately 8,600 people according to 2010 US Census data and continues to grow. Tuba City is the western Navajo headquarters for the Bureau of Indian Affairs (BIA) and is the site of two large boarding schools. Tuba City is also home to a public school system that serves students in pre-school through high school. The schools, government offices, Tuba City Regional Health Care Corporation (TCRHCC), a shopping center, a police station, motels, restaurants, and various commercial enterprises employ a large percentage of the local population. Many families obtain their economic support traditionally, through animal husbandry and handcraft sales.

1.4 Purpose of the Environmental Assessment

Public Law 86-121 provides NAIHS basis to construct essential sanitation facilities for Native American homes and communities and establishes an effective health improvement program. Federally funded SFC Projects require NEPA compliance. IHS follows Agency NEPA evaluation protocol. This EA was completed according to January 25, 2025, Executive Order (E.O.) 14154, and the Council of Environmental Quality (CEQ) directive to expedite and simplify the permitting process. Reasonably foreseeable effects were analyzed and not characterized as “cumulative effects.” Options presented to correct WWTP deficiencies and the effects of the recommended solution described in the Preliminary Engineering Report (PER) were reviewed in this EA. Public involvement in selecting options is required for an Environmental Impact Statement (EIS). Public comment will not be solicited for this EA. The EA and finding will be posted online.

2.0 ALTERNATIVES INCLUDING THE PROPOSED ACTION

2.1 Alternatives Not Evaluated in Detail

The Navajo Nation and NAIHS considered three WWTP upgrade options. No Action, Extended Aerated Biological Nutrient Removal System (EA BNR), and Existing WWTP Enhanced Nutrient Removal (ENR). ENR modifies cells of the existing Tuba City WWTP and adds a polishing reactor to treat a design flow of 1.0 MGD and achieve the required BOD, TSS, and ammonia effluent limits. Cells would be covered to prevent algae growth and regulate water temperature improving TSS and ammonia removal.

Design and impact of the No Action Alternative and ENR are discussed briefly. No Action and ENR continue to use the existing WWTP that is in good condition. No action fails to reliably treat projected flows of Tuba City community wastewater and meet discharge limits. ENR upgrades are

in an area with undetermined flood risk. Selecting the No Action alternative or ENR would result in health, environment, and security risks for Tuba City and the region. The No Action Alternative and ENR will not be considered further due to risk mitigation need and to cease illegal operation.

The PER describes design criteria, map, environmental impact, land requirements, potential construction problems, sustainability considerations, and cost estimates for EA BNR and ENR.

2.2 Preferred Alternative-Extended Aeration Biological Nutrient Removal System

EA BNR is a mechanical treatment system, which consists of a new WWTP headworks and an EA BNR system. The headworks will include a screenings washer and compactor to remove large debris and compact solids, as well as a vortex grit removal system. Flow will then be pumped to the EA BNR clarification, aeration, digestion, fermentation, and selection zones. Liquids receive ultraviolet (UV) disinfection before being discharged to the Moenkopi wash. Solids wasted from the system will be sent to a belt filter press and sludge drying beds before disposal.

2.2.1 Pre-construction Activities

Permits and Utilities. Prior to initiation of construction, the NAIHS is required to obtain all Federal and Navajo Nation permits and approvals necessary to perform the work, including those related to BIA trust assets, surface area disturbance, stormwater discharge, endangered species and cultural resources. Specific permits and approvals related to these resources are discussed in Section 3.0. The NAIHS will also coordinate with the NTUA and the Navajo Nation Environmental Protection Agency (NNEPA) regarding the scope and timing of the proposed work.

Mobilization and Staging. Project construction materials and equipment including water storage tank and well construction materials, pipeline, valves, gravel, cement, and all necessary supplies are moved to a fenced staging area. Project construction heavy equipment includes excavators, front-end loaders, trenchers, boring machines, trucks, compactors, etc. Parking for worker vehicles is provided at the staging area.

The staging area footprint is identified during project planning and included during environmental investigations and right-of-way clearance. Staging areas can be reused for multiple projects. During construction, the gate is be locked to ensure public safety, prevent vandalism and theft. Upon completion of the regional water system, fencing is removed and staging areas are disked and reseeded according to the Stormwater Pollution Prevention Plan and returned to preconstruction condition.

2.2.2 Construction Details

P.L. 86-121 Projects may include wastewater treatment plants, as per the SFC criteria documents.

2.2.3 Borrow, Stockpiling, and Disposal.

Native sandy soils provide sufficient substrate for the installation of underground pipelines. Excavated soil is stockpiled adjacent to the work area within the existing disturbed ROW footprint.

There will be no off-site disposal of excess excavated subsoils. All excess subsoil materials would be used for the backfilling and grading the work areas.

2.2.4 Construction Schedule.

The jobsite is a dangerous workplace environment and worker/public safety is a primary concern. Worker personal protective equipment (PPE), travel and safety are considered for work during adverse weather conditions. Typically, Navajo Nation construction season runs from early spring to late fall. Due to environmental constraints and project demands, construction activities occur year-round as weather permits. Work is conducted during daylight hours, Monday through Friday. No work will be conducted on weekends or during the late evening or night hours. NECA will provide detailed construction schedule.

2.2.5 Post-construction Activities.

Demobilization and Clean Up. After the project is completed, construction equipment, temporary fencing, unused materials, and debris will be removed from the staging area. This area will be returned to pre-project conditions, including disking and broadcast seeding with a native plant mix to minimize erosion and ensure revegetation. In addition, all work areas will be cleaned of all rubbish and materials, and all parts of the work would be left in a neat and presentable condition.

Operation and Maintenance. SFC project construction is contingent upon agreement that facilities will be maintained and operated according to manufacturer's recommendations. The NTUA provides assurance that SFC facilities will be operated and maintained. The project MOA specifies project transfer procedures. The project Transfer Agreement (TA) designates the operator. Operations and maintenance staff inspect, repair and ensure the integrity of the system. Access to the CWS for maintenance would be via the existing paved, dirt and graveled roadways.

3.0 AFFECTED RESOURCES AND ENVIRONMENT EFFECTS

This EA discusses environmental resources in the project area; evaluates the effects of the alternatives (including the preferred alternative) on the resources; and proposes measures to avoid, minimize, or mitigate any adverse effects to less than significant.

3.1 Resources Not Considered in Detail

The resources not considered in detail are discussed in Section 3.1. Sections 3.2-3.12 describe the significant resources in the project area, as well as any effects of the alternatives on those resources. When necessary, mitigation measures are also proposed to avoid, reduce, minimize, or compensate for any effects determined to be significant.

3.1.1 Climate

The Navajo Nation experiences four seasons, with annual precipitation ranging from less than 6 inches to more than 20 inches in the mountains. Climate is arid characterized by hot, mostly dry summers and freezing, snowy winters. Due to the relative size and nature of the work, Project

NA-25-XY7 and NA-26-MJ4 would have no effect on climate.

3.1.2 Geology

The Navajo Nation lies entirely on the Colorado Plateau, and is made up of an array of geologic features including gentle uplifts, monoclines, broad basins, diatremes, and laccolith ranges. Due to the size and nature of the work, Project NA-25-XY7 and NA-26-MJ4 would have no effect on geology.

3.1.3 Fisheries

The Navajo reservation and is bounded by the San Juan River to the north, the Little Colorado River to the south, and the main stem of the Colorado River to the west. There are approximately 20 lakes on the Navajo Nation including Lake Powell. Lakes and rivers on the Navajo Nation are used for recreational fishing. Because of the distance and nature of the work, the Project NA-25-XY7 and NA-26-MJ4 would have no effects on rivers or their fisheries.

3.1.4 Socioeconomics and Environmental Justice

Navajo Nation Chapters are 110 sparsely populated, remote rural community centers within the Navajo Nation.

According to the 2020 census, approximately 8,000 people reside in Tuba City Chapter. Approximately 86 percent of the population is of American Indian/Alaskan Native descent. Thus, minorities comprise most of the population in the Chapter.

Project NA-25-XY7 and NA-26-MJ4 would not be expected to affect Tuba City Chapter socioeconomic conditions. The population, ethnic makeup, income, and poverty rate would continue to depend on factors such as social trends, overall economic conditions, and services and programs provided by the BIA and NAIHS. Also, the project would have no disproportionate effects on low-income populations. Consistent with the project purpose, the work would benefit the entire community by providing a more dependable community sewage disposal system.

3.1.5 Land Use and Zoning

Land uses in the Project NA-25-XY7 and NA-26-MJ4 area include Federal and County facilities, small residences, subsistence farming, and livestock production. Since the project would only upgrade existing features of the CWS, the work would have no effect on these land uses. There are no zoning ordinances within Navajo Nation Chapters.

ROW's are currently grazed by livestock year around under local grazing leases. Prior to construction, the lease holders would be notified of the work schedule and asked to move their livestock away from the work areas. As needed, the work areas would then be fenced to ensure worker and livestock safety. Once construction and restoration are completed, the livestock would return to the areas for grazing.

3.1.6 Prime Farmland

Project NA-25-XY7 and NA-26-MJ4 area does not include any land that is classified as prime farmland or farmland of any importance. As a result, the project would have no effect on prime farmland.

3.1.7 Recreation

The Navajo Nation has not designated any specific recreation areas within the Project NA-25-XY7 and NA-26-MJ4 area. Because there are no recreation facilities or opportunities in the project area, the work would have no effect on recreation.

3.1.8 Traffic

During construction, large equipment, haul trucks and worker vehicles would use local highways and unimproved roadways. No road closures would be necessary, and access to facilities, schools, and residences would be maintained. The contractor would be required to ensure public safety on or near roadways. As a result Project NA-25-XY7 and NA-26-MJ4 would not be expected to have any effect on traffic.

3.1.9 Floodplains

Project NA-25-XY7 and NA-26-MJ4 is located in FEMA Flood Zone D (areas with possible but undetermined flood hazards). PER section 4.2.3, describes project formal flood hazard says, “the benefit of this location alternative include development outside of the 100-year and 500-Year flood plains and reuse of existing pipe.” Because EA BNR upgrades will be constructed outside of the 500-year floodplain, the project would not be expected to have any effect on floodplains.

3.1.10 Wetlands and Riparian Habitat

There are no wetlands or riparian habitat in or near the ROW. As a result, Project NA-25-XY7 and NA-26-MJ4 would have no effect on wetlands and riparian habitat.

3.1.11 Forestry/Trust Assets

The Navajo Nation Woodland Inventory Analysis Report (1986-1991 measurement) for Tuba City Chapter estimates there is approximately 988 cubic feet of commercial woodland forest products per acre. These woodland forest products are comprised of juniper and pinyon pine trees. The site produces approximately 5.81 cubic feet of woodland forest products per acre per year. In addition, ponderosa pine may be present within the project area. The Navajo Nation Ten-Year forest Management Plan estimates there is approximately 1000 board feet of commercial timber per acre in the adjacent timberlands. By determining nature and disposition of Forestry/Trust Assets, Project NA-25-XY7 and NA-26-MJ4 would have no effect on Forestry/Trust Assets.

3.2 Topography and Soils

3.2.1 Existing Conditions

Topography. The Navajo Nation and is characterized by arid deserts and alpine forests with high plateaus, mesas, and mountains reaching as high as 10,500 feet and low desert regions an altitude of 5,500 feet. Volcanic activities, wind and water erosions have formed and carved the Navajo Nation's mesas, mountains and canyons. World-renowned formations including Canyon de Chelly, Shiprock, Monument Valley, Chuska Mountains, Window Rock, etc. are located within the Navajo Nation boundaries.

Project NA-25-XY7 and NA-26-MJ4 regional geomorphology is typical of the Colorado Plateau, with frequent high mesas, deep canyons, and plateau areas. Elevations range from approximately 6,000 feet in the plateau areas to approximately 8,500 feet in the mountain foothills. The area is drained by tributary washes of the San Juan River to the north. The area is semi-arid with annual precipitation ranging from 6-14 inches and average annual lake evaporation ranging from 50-60 inches. Seasonal temperatures range from -30° F to 95° F; frost penetration rarely exceeds 40 inches. The area is sparsely vegetated with grass and shrubs, and the terrain is generally level to slightly rolling with some sandstone rock outcroppings. The soil is residual sandstone with rocky outcroppings on or near the surface in many places. Alluvial material is found in the bottom of the drainages.

Soils. Navajo Nation soils on the range from arid, saline soils in low-lying deserts and scrublands to productive soils with considerable amounts of organic matter within productive forests. Soils are the result of complex interactions between parent material (geology), climate, topography, organisms and time (Brady & Weil 1999). Soils are classified by the degree of development into distinct layers or horizons and their prevailing physical and chemical properties (Fanning & Fanning 1989). Similar soil types are grouped together into soil orders based on defining characteristics such as organic matter and clay content, amount of mineral weathering, water and temperature regimes, or other characteristics that give soil unique properties (Jenny 1980). Five soil orders are represented on the Navajo Nation trust lands. Soils in the area are formed mostly from sandstone, although basalt, limestone, shale, and siltstone are also important sources of parent material. Soil forms are also heavily influenced by the arid to semiarid climate, predominant vegetative communities, and the distinct topography of the region. Soil data was obtained from the NRCS web soil survey for Arizona, New Mexico and Nevada to assess major soil orders and coverage on the Navajo Nation (NRCS 2013). Soils provide important ecosystem services, from water filtration, impacting nutrient exchange from terrestrial ecosystems to surface and groundwater reservoirs, and providing a variety of nutrients to plants and animals.

The project area is sparsely vegetated with grass and shrubs, and the terrain is generally level to slightly rolling with some sandstone rock outcroppings. The soil is residual sandstone with rocky outcroppings on or near the surface in many places. Alluvial material is found in the bottom of the drainages.

3.2.2 Effects

Basis of Significance. An alternative would be considered to have a significant effect on topography and soil resources if it would (1) substantially alter the local topography and/or (2) result in the loss or degradation of soil resources.

No Action. This Alternative would have no effects on existing topography or soils in project area. The condition of the surface relief and soil units would be expected to remain the same.

Project NA-16-T95 and NA16-XL8. Construction of EA BNR would have minor effects on the local topography, but would result in short-term effects on soils at the work areas. These effects would result from disturbance of soils during excavation and installation of project facilities. Types of effects could include loss of topsoil, loss or degradation of subsoils, loss due to wind and/or erosion, or offsite transport by vehicles. However, any loss or degradation of soils would be minimized by implementing best management practices (BMP) during construction. For example, topsoil at all work areas would be stockpiled and reapplied prior to seeding with a native plant mix. Excavated subsoils would be stored and used for backfilling and grading the work areas. Other BMPs would include installing silt fencing to minimize erosion, watering disturbed soils to control fugitive dust, preventing sediment transport offsite by vehicles, stabilizing disturbed areas as soon as possible after grading, and seeding all disturbed areas. As a result, there would be no loss or degradation of soils, and Project NA-16-T95 and NA16-XL8 would have no significant effects on soil resources.

3.2.3 Mitigation

Since there would be no significant effects on topography or soils, no additional mitigation would be required. Implementation of BMP's during construction would minimize any effects to the soil resource. If off-site disposal becomes necessary, the contractor would be required to dispose of the materials at a licensed disposal site or landfill.

3.3 Water Resources and Quality

3.3.1 Existing Conditions

Water Resources. Navajo Nation rivers where the residents access water include the Colorado, Little Colorado, San Juan, Rio Grande, Rio Puerco, Rio San Jose, Zuni River, Bill Williams River, Verde River and a capillary network of named and unnamed tributary washes.

The Tuba City water system was originally constructed as three separate systems owned by the BIA, the Navajo Nation, and the Public Schools. Before 1969, the Tribal system was expanded and improved by the NAIHS and the Tribe under PL 86-121 projects WI-61-321, WI-66-950-CLR, and WI-67-351d. These projects provided an additional 400,000-gallon storage tank for a total of 800,000 gallons and expanded the distribution system. In 1969, Economic Development Administration (EDA) project number 08-1-00718 provided a new 10-inch water transmission line and constructed Well #2, to supplement Well #1. In 1972, EDA project number 07-1-012023.1 combined the three separate water systems, and constructed the 1,500,000-gallon Greyhills storage

tank, Wells #3, #4, and #5, and additional water distribution lines. Chlorination and fluoridation equipment was also provided under this project.

Project NA-72-533 connected 36 homes in Kerley Valley to the Tuba City water system. Project NA-77-154 connected 105 NHA homes and 41 existing homes to the Tuba City water system, and provided an altitude valve at the Greyhills storage tank. Project NA-82-254 connected 87 additional NHA homes to the Tuba City water system, constructed Well #6, and constructed the 2,000,000-gallon water storage tank in North Tuba City to complete the existing "triple tanks."

More recent IHS projects include NA-77-196/721, a waterline extension project near Old Airport, and numerous scattered projects. These scattered projects connected scattered homes with short waterline extensions to existing water mains. Project NA-94-799, connected homes in the Van Zee Community to the Tuba City Water System, along with other homes in the vicinity of that waterline extension.

In 2016 wells #IR and #3R were constructed and Wells #1 and #3 were taken out of service. In 2017 new pumps were installed in wells #IR and #3R. Plumbing, electrical, telemetric upgrades, and improvements to the two well house structures are also planned to occur in 2027 on project NA-11-R71.

Water Quality.

The Tuba City CWS is operated by the NTUA. NTUA water use records for the year 2016 show an average daily water usage of 323,150 gallons per day (gpd), based on meter sales. The current design analysis for Tuba City shows a potential total production from the six wells of 1609 gallons per minute (gpm). This results in an average daily pumping cycle of 6.6 hours per day.

In 2016, the number of commercial and institutional users was 134, and the number of residential users was 1,764. The 1,764 Tuba City residences used water at an average rate of 184 gallons per day (gpd).

3.3.2 Effects

Basis of Significance. An alternative would be considered to have significant effect on water resources if it would (1) substantially reduce natural surface or groundwater resources or (2) interfere with existing water delivery. An alternative would be considered to have a significant effect on water quality if it would substantially degrade the quality of natural surface or groundwater resources.

No Action. This alternative would have no effect on surface or ground water resources or quality. However, residents would continue to be with a less dependable community sewage disposal system.

Project NA-16-T95 and NA16-XL8. Construction of the project EA BNR would have no effect on water resources, including short-term effects on water quality. Exposure of soil, particularly in drainages on slopes, could result in erosion and sediment transport, particularly during the after-storm events during construction. These sediments could move down-gradient and eventually flow

into existing streams and rivers, resulting in increased turbidity and degraded water quality. However any erosion and transport of sediment would be avoided or minimized by implementing Best Management Practices (BMPs) during construction. BMPs would include limiting soil disturbance to staging and work areas using straw bales, waddles, and silt fencing to contain sediment, stabilizing disturbed areas as soon as possible after grading and seeding all disturbed areas with a native plant mix. As a result the project would not substantially degrade the quality of downstream streams or rivers and there would be no significant effects on water quality post construction.



3.3.3 Mitigation

Since there would be no significant detrimental effect on water resources or quality, no additional mitigation would be required. Implementation of BMPs during construction would minimize any effects to downstream water quality.

Since the total area of surface disturbance would be greater than 5 acre the NAIHS and NECA would be required to file a U.S. Environmental Protection Agency (EPA) Notice of Intent (NOI) with the and obtain a Clean Water Act (CWA) Construction General Permit (CGP22) and prepare and follow a Stormwater Pollution Prevention Plan (SWPPP). Where there is evidence of flow, construction may be performed outside of the Ordinary High Water Mark (OHWM). For work within the OHWM, CWA section 401 certification and section 404 permit may be required. On the Navajo Nation, the NNEPA has primacy on 401 certification and charges a sliding fee for a 401 certification. U.S. EPA provides 401 certification on private land without charge. U.S. Army Corps of Engineers makes jurisdictional determinations and administers CWA section 404 permit decisions.

3.4 Vegetation and Wildlife

3.4.1 Existing Conditions

Vegetation. Plant communities within the Navajo Nation include the Great Basin desert shrub and pinyon-juniper savannah. Both of these communities are represented by similar types of shrubs, perennial grasses, forbs, and annual plants that inhabit high cold desert areas. Pinyon-juniper savannah also has areas with an overstory of pinyon pine and juniper, as well as areas of open grassland.

Representative types of shrub species include four-wing saltbush, sagebrush, winterfat, soapweed yucca, rabbit brush, Mormon tea, and broom snakeweed. Perennial grasses include blue grama, galleta, Indian ricegrass, bottlebrush squirrel tail, needle and thread, and sand dropseed. Forbs include asters, coneflowers, Indian paintbrush, thistles, and groundsel. Annual plants include cheatgrass, Russian thistle, tansy mustard, sunflower, and kochia weed.

Wildlife. Shrubs, grasses forbs and annuals in both plant communities provide , shelter, resting, and nesting sites for small mammals, birds, and reptiles. Due to the additional overstory of pinyon pine and juniper trees and grasslands, pinyon-juniper savannah has somewhat more diverse wildlife than Great Basin desert-shrub.

Representative types of mammal species include the whitetail antelope ground squirrel, whitetail prairie dog, Great Basin pocket mouse, Ord's kangaroo rat, wild canines, and montane vole. Birds include the horned lark, sage thrasher, and sage sparrow. Common reptile species the sagebrush lizard, collared lizard, northern desert horned lizard, norther whiptail, gopher snake, and western rattlesnake (Brown 1994).

Other small mammals in the pinyon-juniper savannah include cottontail, pinyon mouse, valley gopher, porcupine, Mexican woodrat, and Ord's kangaroo rat. Birds include common night hawk, pinyon jay, northern flicker, western kingbird, horned lark, loggerhead shrike, sparrow, grey-headed junco, and common raven. Reptiles include striped plateau lizard, plateau whiptail, and short-horned lizard.

Migratory Birds. The USFWS' Birds of Conservation Concern (2008) were identified: ferruginous hawk, golden eagle, peregrine falcon, prairie falcon, mountain plover, gray vireo, pinyon jay, Bendire's thrasher, Brewer's sparrow, grasshopper sparrow, and chestnut-collared long-spur.

3.4.2 Effects

Basis of Significance. An alternative would be considered to have a significant effect on vegetation and wildlife if it would (1) result in the substantial loss or degradation of any plant community providing high quality habitat, (2) permanently displace substantial numbers of resident wildlife species, or (3) result in the intentional take of migratory bird.

No Action. This alternative would have no effect on existing vegetation, wildlife, or migratory birds in the project area. The Great Basin desert scrub and pinyon-juniper savannah plant

communities, as well as associated wildlife species, would be expected to remain the same.

Project NA-25-XY7 and NA-26-MJ4. Construction of the project EA BNR would result in short-term effects on the vegetation and wildlife at the work areas. These effects would result from construction activity and clearing of surface vegetation during installation of the waterline, valves, service lines and meters. Types of effects would include disturbance and/or loss of desert-scrub and pinyon-juniper plant species within the ROW area. In addition, any wildlife would be disturbed and/or displaced during the work. However, most of the existing ROW area has only scattered vegetation, including weedy species with little to no wildlife habitat value.

Disturbance and/or loss of vegetation and wildlife would be avoided or minimized to the extent possible by implementing BMPs during construction. These BMPs would include limiting soil disturbance to staging and work areas, stock piling topsoil for reuse, and avoiding work during nesting season for migratory birds. In addition, once construction is completed all disturbed areas would be graded, disked and prepared for seeding, including reapplying the stockpiled topsoil. A native plant seed mix consistent with surrounding vegetation with then be broadcast over the disturbed areas to encourage revegetation and restoration of wildlife habitat.

Once construction activity ends and wildlife habitat is restored, any displaced wildlife species would be expected to return to the area. Because of the nature of the climate and native vegetation (shrubs, forbs, and grasses with no trees), restoration is expected within just a few years at most. As a result, there would be no loss of active migratory bird nests. As a result, the project would have no significant effects on vegetation or wildlife, including migratory birds.

3.4.3 Mitigation

Tree cutting within the ROW is not required as part of the project. Since there would be no significant effects on vegetation, wildlife, or migratory bird nests, no additional mitigation would be required. Implementation of BMP's and restoration of native vegetation via seeding would minimize any effects on vegetation and wildlife.

3.5 Threatened and Endangered Species

3.5.1 Existing Conditions

A list of threatened, endangered, and candidate species for the project area was obtained from The Navajo Nation Department of Fish and Wildlife (NNDFW) GIS database. Navajo Endangered Species including Federally Threatened, Endangered, and Candidate species with potential to occur or known to occur within 1 and 3 miles of the project were documented and submitted to NNDFW for review. NNDFW issued the current Biological Resource Compliance Form (BRCF) for conditions for compliance with applicable laws. The attached BRCF and NAIHS TE Clearance complete the NAIHS TE Clearance process.

3.5.2 Effects

Basis of Significance. An alternative would be considered to have significant effect on Federally listed threatened and endangered species if the proposed action would (1) result in the take of a Federally listed threatened and endangered species; or (2) adversely affect the species critical habitat.

No Action. This alternative would have no effect on Federally listed threatened or endangered species, or their habitat.

Project NA-25-XY7 and NA-26-MJ4. Construction of EA BNR will follow constraints outlined in the attached BRCF, dated May 3, 2022, and NAIHS TE Clearance dated June 15, 2026, would not be expected to affect any Federally listed threatened or endangered species, or their habitat. There is no aquatic fish habitat and no suitable habitat for any of the species except the California condor. However, the condor is not expected to use the project area for foraging habitat because of the presence of human activity. As a result, there would be no effect on Federally listed threatened or endangered species.

3.5.3 Mitigation

Since there would be no effect on Federally listed threatened or endangered species, no mitigation would be required.

3.6 Navajo Special Management Species

3.6.1 Existing Conditions

The Navajo Nation Council, Resolution RCS-41-08, mandates the consideration of Navajo Endangered Species List (NESL) species in or near the project area. The species on the NESL are specially managed to prevent or reduce the need for the USFWS to list the species as threatened or endangered in the future. The Navajo Nation Department of Water Resources (DWR) has determined that eight species warrant special management consideration for this project. The NESL and the Species Evaluation in the NAIHS TE Clearance summarizes general habitat associations and potential occurrence for each species.

The golden eagle has the potential to occur in the vicinity of the project area. While the eagle nests primarily on cliffs and trees in mountainous, canyon terrain, the bird forages for prey in open areas of pinyon-juniper and desert-scrub in the project area. The desert-scrub habitat along the ROW provides habitat for a variety of small mammals such as the black-tailed jackrabbits, desert cottontails, ground squirrels, and field mice. These small mammals are prey for the eagle.

The environmental contractor conducted field visits to confirm that none of the Federally listed or special management species, or their habitat, currently occur in or near the project area. The BRCF completes the NAIHS TE Clearance process.

3.6.2 Effects

Basis of Significance. An alternative would be considered to have a significant effect on NESL if it would (1) result in the take of a NESL species or (2) affect the species habitat.

No Action. This alternative would have no effect on NESL species or their habitat.

Project NA-25-XY7 and NA-26-MJ4. Construction of EA BNR could have short-term effects on golden eagle. Construction noise and activities could displace the eagle's prey species foraging in the desert-scrub habitat along the ROW. However, once construction is completed, all disturbed areas would be restored via grading, disking, and seeding with a native plant mix. As a result, the eagle's prey species would be expected to return to the ROW area. In addition, the eagle could continue to forage in the thousands of acres of similar habitat immediately adjacent to the project area. As a result, there would be no significant effect on the golden eagle.

3.6.3 Mitigation

Since there would be no significant effects on NESL species, no mitigation would be required.

3.7 Air Quality

3.7.1 Existing Conditions

The Navajo Nation is designated by the U.S. EPA as an attainment area for any listed pollutants regulated by the Clean Air Act. Concentrations of the primary criteria pollutants, including ozone, particulate matter PM₁₀, particulate matter PM_{2.5}, sulfur dioxide, nitrous oxides, carbon monoxide, and volatile organic compounds currently meet the National Ambient Air Quality Standards (EPA, 2017)

The primary source of hydrocarbon emissions in and near the project area is motorized vehicles. Dust is also generated by livestock herding, occasional recreational activities, and use of dirt roads. Occasional regional wildfires during the summer can also degrade the air quality.

Air quality sensitive receptors include sensitive land uses and those individuals and/or wildlife that could be affected by changes in air quality due to emissions and fugitive dust from the project. Air quality sensitive land uses in or near the project area include health clinics and schools, and sensitive receptors include residents, students, and visitors.

3.7.2 Effects

Basis of Significance. An alternative would be considered to have a significant effect on air quality if it would (1) violate any ambient air quality standard or (2) expose humans or sensitive species to substantial pollutant concentrations.

No Action. This alternative would have no effect on existing air quality in the project area. Air quality would continue to be influenced by climate, emissions from vehicles and herding livestock

,and wild fires.

Project NA-25-XY7 and NA-26-MJ4. Construction of the project(s) has short-term effects on air quality. The operation of vehicles and heavy equipment, including a hydraulic excavator, front end loaders, compactor, various types of trucks, would produce emissions as hydrocarbon exhaust and particulate matter. In addition, there would be short-term increases in particulate matter as fugitive dust during soil excavation and operation of vehicles and heavy equipment.

However, based on the relatively low levels of hydrocarbon emissions produced during construction of similar small projects on the Navajo Nation, these short-term emissions are not expected to violate any Federal ambient air quality standards. The generation of fugitive dust would be minimized by implementing BMP's during construction. These BMP's could include water trucks, sprinklers, fences, or windbreaks; and speed limits on gravel and dirt roads. As a result, neither humans nor sensitive species would be expected to be exposed to substantial concentrations of either hydrocarbons or fugitive dust. Once the project is completed, air quality would return to pre-project conditions so there would be no long-term effects on air quality in the area. As a result, there would be no significant effects on air quality.

3.7.3 Mitigation

Since there would be no significant effects on air quality, no additional mitigation would be required. Implementation of BMP's during construction would minimize any effects to air quality.

3.8 Esthetics

3.8.1 Existing Conditions

The natural landscape of the area around the Navajo Nation is dominated by mountain vistas, distant views and canyons. Local views include residences, sagebrush, Navajo Sandstone Mesas and cliffs, and pinyon-juniper vegetation in the surrounding foothills. Viewers include local residents, as few recreationists, and motorists.

Wastewater treatment plants are above-grade and visible. The existing sewer alignment is marked with red t-posts on the surface, but the underground pipe is not visible. In some locations, the existing ROW is partially obstructed by the tall sagebrush, pinyon and juniper trees, and rolling sand dunes.

3.8.2 Effects

Basis of Significance. An alternative would be considered to have significant effect on esthetics if changes in landform, vegetation, or structural features would substantially increase levels of visual contrast as compared to surrounding conditions. The significance of esthetic effect is evaluated with reference to the number of viewers affected.

No Action. This alternative would have no effect on existing esthetics in the project area. The landscape and views in the project area would be expected to remain the same.

Project NA-25-XY7 and NA-26-MJ4. Construction of the project would have short-term effects on esthetics. The presence of construction equipment, vehicles, and activities would change the local views. These changes would be apparent to viewers near the work areas in the project area. However, the number of viewers affected at one time would be limited to only those few residents and visitors nearest the work areas. In addition, effects would be short term during construction. As a result, any short-term effects would be considered less than significant.

Construction of the project would have no long-term effect on esthetics. All infrastructure would be typical in nature, and the disturbed surface would be graded, disked, and seeded with a native plant mix to encourage revegetation. As a result, the local views would not change once construction and revegetation are completed.

3.8.3 Mitigation

Since there would be no significant effects on esthetics, no mitigation would be required.

3.9 Noise

3.9.1 Existing Conditions

No noise ordinance for construction activities currently exists on the Navajo Nation including the project area. Noise is managed so as to not cause impairment to the health of nearby sensitive receptors or unreasonably interfere with the comfort of life or property.

Project NA-25-XY7 and NA-26-MJ4 area is located in a quiet, rural environment with little development and few people. The primary sources of noise in this area are a few motor vehicles, human activities, and natural sounds such as wind. The noise sensitive land uses in or near the project area include the health clinics, schools, and scattered residences. Sensitive receptors include residents, students, visitors, and occasional wildlife.

3.9.2 Effects

Basis of Significance. An alternative would be considered to have a significant effect on noise if it would (substantially increase background noise over the long term). The significance of noise effects is evaluated with reference to existing noise, duration of the noise, and number of sensitive receptors affected by construction.

No Action. This alternative would have no effect on existing noise in the area. Noise would continue to be influenced by motor vehicles, human activities, and natural sounds.

Project NA-25-XY7 and NA-26-MJ4. Construction of the project would have short-term effects on noise. Operation of construction equipment and worker activities would generate noise and could disturb nearby residents, students, and other sensitive receptors in or near work areas. Distances between work areas would limit sensitive receptors affected at one time. Once construction is completed, background noise would return to previous conditions so there would be no long-term effect on noise. As a result, the project would have no significant effect on noise.

3.9.3 Mitigation

Since the project would have no significant effects on noise, no mitigation would be required. To further minimize any effects on noise, construction hours would be limited to the daylight hours of 7:30 a.m. to 4:30 p.m., Monday through Friday. No work would be conducted on weekends or during the late evening or night hours.

3.10 Cultural Resources

3.10.1 Existing Conditions

The entire area of potential effect for the project was surveyed by Westland Engineering and Environmental Services under the authorization of a Navajo Nation Cultural Resources Investigation Permit HPD-22-177 and approved under a Cultural Resources Compliance Form (CRCF) dated March 24, 2022. Archaeology staff conducted a pedestrian survey of the project area to determine if any cultural resources were located with or immediately adjacent to the project.

The pedestrian survey reaffirms existing sites, identifies new sites, and recommends listing in the National Register of Historic Places and for protection under the Archaeological Resource Protection Act. Sites are evaluated for known qualities for listing under the American Indian Religious Freedom Act.

The attached inventory report, WSP 2022-028, 11.46 ac., recommended a determination of “no historic properties affected” for Project NA-25-XY7 and NA-26-MJ4. Any significant cultural resources eligible for protection under Federal law and encountered during the field survey would be avoided, in accordance with the Stipulations and Avoidance Conditions in an existing Programmatic Agreement between the Navajo Area IHS, Navajo Nation Historic Preservation Office, and the Advisory Council on Historic Preservation dated January 31, 2000.

3.10.2 Effects

Basis of Significance. An alternative would be considered to have a significant effect if it would adversely affect historic properties. An effect to a historic property is defined under 36 CFR section 800.16(i) as any alteration to the characteristics of such a property that qualify it for inclusion in, or eligibility for, the National Register of Historic Places.

No Action. Since there would be no construction, this alternative would have no effect on cultural resources or historic properties.

Project NA-25-XY7 and NA-26-MJ4. The Navajo Area IHS is the Federal NEPA lead agency ensuring cultural compliance for the WWTP construction. According to the agency clearance, construction of this alternative would have no effect on historic properties. Compliance with section 106 of the National Historic Preservation Act is met by NAIHS verified the Tribal Historic Preservation Officer was afforded an opportunity to comment on the effects of the WWTP construction. NAIHS reviewed NNHPD Cultural Resources Compliance (CRCF) and completed NAIHS Archaeological Clearance dated June 15, 2026.

3.10.3 Mitigation

Since there would be no significant effects on historic properties, no mitigation would be required. If any previous unrecorded or undetected cultural resources are discovered during construction, all work would cease in the immediate area of the exposed resources. The construction contractor would be required to contact the Navajo Area IHS immediately regarding how to proceed.

3.11 Native American Religious Concerns

3.11.1 Existing Conditions

Traditional Cultural Properties (TCP's) are a class of cultural resources that may or may not coincide with archaeological sites and may be subject to one or more federal laws listed in section 5.1. A TCP is eligible for the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community (National Register Bulletin 38).

A field survey conducted by contractor, assures the project avoids any known TCP's in the right of way. Additionally, no TCP's were identified during consultations with local and regional Native American Tribes and NAIHS interviews with chapter coordinators, homeowners and local residents. All projects avoid area blessed structures, Teepee grounds, other ceremonial features, or known human remains.

3.11.2 Effects

Basis of Significance. An alternative would be considered to have a significant effect on Native American religious concerns if known TCP's would be affected by the project.

No Action. Since there would be no construction, this alternative would have no effect on existing traditional cultural properties or American Indian religious concerns.

Project NA-25-XY7 and NA-26-MJ4. Construction of project area would have no effect on known TCP's or American Indian religious concerns. This alternative would not prevent access to other sacred sites or interfere with the performance of traditional ceremonies and rituals.

3.11.3 Mitigation

Since there would be no effect on Native American religious concerns, no mitigation would be required. If any previously unidentified TCP's are discovered during construction, all work would cease in the immediate area of the TCP's. The construction contractor would be required to immediately contact the NAIHS and NHPD regarding how to proceed.

4.0 CUMULATIVE EFFECTS

According to EO 14154, reasonably foreseeable effects are not to be characterized and evaluated as cumulative. Cumulative effects are effects of a project in consideration with other past present or reasonably foreseeably (likely to occur) projects in the area. Currently there are no other ongoing or reasonably foreseeable projects in or near the project area. In addition, there are no past projects that resulted in identifiable long-term effects having a cumulative relationship with the effects of Project NA-25-XY7 and NA-26-MJ4. As a result, when the effects of the project are considered with other past, present, and reasonably foreseeable projects in the area, no cumulative effects are noted.

5.0 COMPLIANCE WITH ENVIRONMENTAL LAWS AND REGULATIONS

5.1 Federal

Executive Order 14154, Unleashing American Energy. *Compliance.* Project NA-25-XY7 and NA-26-MJ4 expedite and simplify the permitting process. Reasonably foreseeable effects are not characterized as cumulative. No Effects on climate, Environmental Justice, DEI were evaluated as part of this EA.

American Indian Religious Freedom Act (42 U.S.C. 1996). *Compliance.* No TCP's have been identified in or near Project NA-25-XY7 and NA-26-MJ4 area.

Archaeological Resources Protection Act (16 U.S.C. 470aa-470mm). *Compliance.* No TCP's have been identified in or near Project NA-25-XY7 and NA-26-MJ4 area.

Bald and Golden Eagle Protection Act (16 U.S.C. 668 et seq.). *Compliance.* Short-term effects on forging habitat for Golden Eagle would not result in take of the species because of the abundance of forging habitat in surrounding areas. In addition, eagle forging habitat in the project area would be expected to improve to better than pre-project conditions once construction is completed because water hauling activities cease.

Clean Air Act, as amended and re-codified (42 U.S.C. 7401 et seq.). *Compliance.* Project NA-25-XY7 and NA-26-MJ4 is not expected to violate any federal air quality standards, or hinder the attainment of air quality objectives in the air shed. NAIHS has determined that the project would have no significant effects on air quality in the area.

Clean Water Act (33 U.S.C. 1251 et seq.). *Compliance.* Project NA-25-XY7 and NA-26-MJ4 would require a Section 402 permit since it would disturb a total of 1 or more acres of land. Completion of a National Pollutant Discharge Elimination System (NPDES) general permit (CGP17) and Stormwater Pollution Prevention Plan (SWPPP) authorizing the discharge of pollutants in accordance with effluent limitations and permit conditions. Since the project as proposed would not involve placing any fill material into waters of the U.S., including wetlands, an ACOE Section 404 permit would not be required.

The Endangered Species Act (CS 16 USC 1531 ETSEQ.). *Compliance.* A clean BRCF was obtained from the NNDFW. No Federally listed species or their habitats have been identified in or near the Project NA-25-XY7 and NA-26-MJ4 area.

Executive Order 11988, Floodplain Management. *Compliance.* The work would have no effect on floodplains.

Executive Order 11990, Wetlands. *Compliance.* Since waterline construction avoids wetlands, the work would have no effect on wetlands.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low Income Populations. *Compliance.* Project NA-25-XY7 and NA-26-MJ4 would have no disproportionate effects on low-income populations. Consistent with the project purpose, the work would benefit the entire community by providing a more dependable drinking water system.

Executive Order 13007 Indian Sacred Sites. *Compliance.* No TCP's have been identified in or near Project NA-25-XY7 and NA-26-MJ4 area.

Farmland Protection Policy Act (7 U.S.C. 4201 et seq.). *Compliance.* The project would have no effect on prime farmland or farmland of statewide importance because no such farmland exists in the project area.

Migratory Bird Treaty Act, as amended (16 U.S.C. 703 et seq.). *Compliance.* Tree-cutting and construction activities that impact breeding and nesting migratory birds on the project are scheduled to begin after the end of breeding and nesting season for migratory birds, the work would not be expected to result in the take of migratory birds. No tree cutting on the project.

National Environmental Policy Act (NEPA) (42 U.S.C. 4321 et seq.). *Compliance.* The final EA and signed Finding of No Significant Impact (FONSI) complete the NEPA to process and fully comply with this act.

National Historic Preservation Act, as amended (16 U.S.C. 470 et seq.). *Compliance.* A clean CRCF was obtained from the NNHPD. The Navajo Area IHS has determined that no cultural resources or historic properties would be affected by the upgrade project, including Project NA-25-XY7 and NA-26-MJ4.

Native American Graves Protection and Repatriation Act (25 U.S.C. 3001, et seq.). *Compliance.* No human remains have been identified in or near the Project NA-25-XY7 and NA-26-MJ4 area.

Council Resolution RCS-41-08, September 10, 2008. *Compliance.* The only species warranted for special management consideration the project area is the golden eagle (*Aquila chrysaetos*). Construction noise and activities could displace the eagle's prey species foraging in the desert scrub habitat along the ROW. However, once construction is completed, all disturbed areas would be restored via seeding, and the prey species would be expected to return to the area. Post-

construction conditions will be better than before. As a result, there would be no significant effect on the golden eagle. This impact is covered by the above BRCF.

6.0 PUBLIC INVOLVEMENT

Public involvement for the project has consisted of public attendance and participation at chapter land use planning meetings, grazing committee meetings, NTUA project planning meetings, and community meetings. Both the chapter and local residents have expressed their support for the project.

7.0 COORDINATION AND REVIEW OF THE EA

A copy of the final EA and finding will be posted online.

8.0 CONCLUSIONS

Based on the information in this EA, Project NA-25-XY7 and NA-26-MJ4 would have no significant effects on the environment. No mitigation beyond avoidance, BMP'S, measures proposed in the EA, and any permit conditions would be required. As a result, the project would meet the requirements for actions permitted following the completion of FONSI as described In 40 CFR 1508.13. These actions would not have a significant effect on the quality of the human environment and do not require preparation of an environmental impact statement. **Therefore, NAIHS recommends FONSI to accompany this EA.**

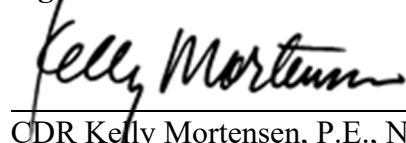
9.0 LIST OF PREPARERS

Kelly Mortensen, P.E., NAIHS NEPA Coordinator, Assistant Director, DSFC, OEHE

10.0 REFERENCES

1. IHS Archaeological Report/Clearance –June 15, 2026
2. IHS Threatened and Endangered Species Clearance – June 15, 2026
3. Chapter Images: 1996 Edition: Division of Community Development, The Navajo Nation, P.O. Box 1896, Window Rock Arizona 86515
4. U.S. Code of Federal Regulations, Title 40, Protection of the Environment
5. National Historic Preservation Act (NHPA), 36CFRPart800.3
6. Navajo Nation Cultural Resources Protection Act, Tribal Council Resolution-CMY-19-88
7. U.S. Code of Federal Regulations, Title 25, Part 169: Rights of Way over Indian Lands.

Signature:



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June 15, 2026
Date



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Navajo Area
Indian Health Service
P.O. Box 9020
Window Rock, AZ 86515-9020

Office of Environmental Health and Engineering

June 15, 2026

Finding of No Significant Impact (FONSI)

NA-25-XY7 and NA-26-MJ4 - Tuba City WWTP Upgrades NTUA Phases I and II Tuba City, Arizona

The U.S Department of Health and Human Services (DHHS), Indian Health Service (IHS) proposes to upgrade the Tuba City Wastewater Treatment Plant (WWTP) to like-new condition, within the Navajo Area Indian Health Service (NAIHS) to provide health care services to the Tuba City IHS Service Unit (TCSU). The WWTP upgrades would provide a modern, technologically advanced plant with capacity to meet the sewage disposal demand and associated health care needs of the TCSU and surrounding tribal communities.

The new WWTP project will construct an extended aeration facility including an anoxic selector, aeration basins, clarifiers, aerobic digesters, and emergency power supply. The proposed facility has a 20-year design capacity of 1.3 million gallons per day (MGD). For sludge management, a belt filter press and sludge storage pad are recommended. The project facility will include a new administration building and new maintenance building for equipment storage and repairs. For disinfection, a new ultraviolet (UV) disinfection system is recommended.

This Environmental Assessment (EA) was prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 (42 USC 4321 et seq.), the Council on Environmental Quality (CEQ) regulations (40 Code of Federal Regulations (CFR) 1500-1508) for implementing NEPA, the DHHS General Administrative Manual, Part 30, and the IHS Environmental Review Manual.

This EA analyzes the potential environmental impact that would result from the Proposed Action and Alternatives. The Proposed Action, one alternative, and the No Action Alternative were considered for this project. Under the No Action alternative, the WWTP would not be constructed.

Environmental Effects:

No Action and Enhanced Nutrient Removal

Design and impact of the No Action Alternative and Enhanced Nutrient Removal (ENR) continue to use the existing WWTP. No action fails to reliably treat projected flows of Tuba City community wastewater and meet discharge limits. ENR upgrades are in an area with

undetermined flood risk. Selecting the No Action alternative or ENR would result in health, environment, and security risks for Tuba City and the region. The No Action Alternative and ENR will not be considered further due to risk mitigation need and to cease illegal operation.

Proposed Action

Extended Aeration Biological Nutrient Removal System (EA BNR) is a mechanical treatment system, which consists of a new WWTP headworks and an EA BNR system. The headworks will include a screenings washer and compactor to remove large debris and compact solids, as well as a vortex grit removal system. Flow will then be pumped to the EA BNR clarification, aeration, digestion, fermentation, and selection zones. Liquids receive ultraviolet (UV) disinfection before being discharged to the Moenkopi wash. Solids wasted from the system will be sent to a belt filter press and sludge drying beds before disposal.

Public Notice

The EA and Findings of No Significant Impact (FONSI) will be posted on the IHS website. The Navajo Area Indian Health Service (NAIHS) will make these documents available. Copies of the documents will be available for public review at the NAIHS, Navajo Area Office, Room 211, Second floor, Division of Sanitation Facilities Construction, Highway 264 St. Michaels, AZ; (928) 871-1446.



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