

CITY OF NOGALES



March 28, 2018

Nichole Osuch
Project Manager
Voluntary Remediation Program
Arizona Department of Environmental Quality
1110 West Washington Street
Phoenix, AZ 85007

RE: USCBP Remedial (Limited) Action Plan

Dear Ms. Osuch,

On behalf of the City of Nogales, Az, I submit letter of concern with reference to the USCBP "Remedial Action Plan" outlining the proposed "**limited remediation**" plans for the pervasive "lead contamination" on the Arbo property, and beyond.

Do understand that the Border Patrol's lease arrangement required that it would be responsible for maintaining the Arbo Range in a safe condition.

The Border Patrol practice Shooting Range was initially for the sole purpose of as a pistol range. However, the Border Patrol has used the range for shotgun and rifle qualifications as well.

The major concern remains, the long-term deterioration of lead fragments and negative contamination impact to the extended surrounding, more so, the Nogales, Az, ground water tables.

The City's primary concern is that, given the seriousness of the lead contamination, the USCBP Remedial Action Plan is critically limited in scope and regrettably underfunded.

Remediation should be with the direct supervision of the Arizona Department of Environmental Quality (ADEQ) Voluntary Remediation Program (VRP), and the department strict oversight to assure long-term resolution of the contamination, with the health and welfare of the citizens as the primary goal.

We humbly request that ADEQ not relinquish its environmental oversight/enforcement responsibility as it relates to this site.

I thank you for your consideration of this request. Please feel free to contact me if you require further information regarding the negative environmental impact of this site.

Best Regards,

A handwritten signature in blue ink that reads "Frank J. Felix".

Frank J. Felix, Ph.D.
City Manager
777 N. Grand Ave,
Nogales, Arizona 85621
520.287.6571