

# Community Relations Plan

Fort Bayard Lead-Based Paint and  
Asbestos Abatement Brownfields  
Cleanup Project, Fort Bayard, New  
Mexico

May 9, 2023

## Quality information

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## List of Acronyms and Abbreviations

%	percent
ACM	asbestos-containing materials
Acme	Acme Environmental, Inc.
AECOM	AECOM Technical Services, Inc.
ASHERA	Asbestos Hazard Emergency Response Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
CFR	Code of Federal Regulations
CRP	Community Relations Plan
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAAS	Flame Atomic Absorption Spectroscopy
HUD	Housing and Urban Development
LBP	lead-based paint
mg/cm <sup>2</sup>	milligrams per squared centimeters
NESHAP	National Emission Standards for Hazardous Air Pollutants
NMED	New Mexico Environmental Department
PLM	polarized light microscopy
ppm	parts per million
RBM	Regulated Building Materials
RCRA	Resource Conservation and Recovery Act
RECs	recognized environmental conditions
Site	Fort Bayard
U.S.	United States
Weston	Weston Solutions, Inc.
XRF	X-ray fluorescence

# 1 Introduction

The Community Relations Plan (CRP) was developed to describe the strategy for engaging residents and citizens potentially affected by planned activities to be conducted at Fort Bayard (Site) located proximate to 100 Calle El Centro, Fort Bayard, Grant County, New Mexico and to better understand and address their concerns during the implementation of the work. The CRP additionally outlines how citizens will be involved throughout the planning process for this project.

This CRP consists of four main sections:

- Section 1 – Introduction
- Section 2 – Project Background
- Section 3 – Community Relations Background
- Section 4 – Community Relations Program

This CRP describes the planned activities which include the abatement of Lead-Based Paint (LBP) and asbestos-containing materials (ACM) at buildings 54, 59, 67, 70, and 149 which will be conducted in accordance with applicable federal and local regulations. The CRP also includes additional activities tailored to meet the unique community involvement needs of those who live and work near the Fort Bayard Brownfields Project. This project is a recipient of United States (U.S.) Environmental Protection Agency (EPA) Brownfields funding, and the CRP has been developed in accordance with U.S. EPA guidance for conducting community involvement programs.

## Spokesperson and Administrative Record

The spokesperson for this project for the U.S. EPA is:

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The spokespersons for Fort Bayard are:

Richard Bauch (City Mayor)  
516 Fort Bayard Street  
Village of Santa Clara, NM 88026  
Phone: 575-537-2443

Sheila Hudman  
516 Fort Bayard Street  
Village of Santa Clara, NM 88026  
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The Document Repository will be located at the Santa Clara Village Hall, located at 516 Fort Bayard Street, Santa Clara, New Mexico 88026.

## 2 Project Background

### 2.1 Location and Background

The Fort Bayard Historic District is located in Grant County north of U.S. 180, immediately north of the village of Santa Clara and approximately six miles east of Silver City. The district consists of approximately 704 acres. LBP and ACM, which was identified during a previous phase of this project, will be abated in a portion of the Fort Bayard Historic District known as the Nurses Residential Buildings, as well as Building 54 (Museum Building). Figure 1 below is a portion of an aerial photograph showing the Site, and a description of each building is described in Section 2.2.

Figure 1 – Site Location Map



## 2.2 Site/Facility History

Fort Bayard was established as a United States Army installation in 1866. It was later converted into the Army's first tuberculosis sanatorium in 1899. In 1922, the fort was transferred to the Veteran's Administration, who then utilized the Site as a Veterans Administration hospital. The federal government closed the hospital in 1965 and the facility was transferred to the State of New Mexico. The Fort Bayard property comprises of two non-contiguous areas identified as Nurses Residential Buildings, which constitutes an area of about 7.5 acres and includes the following four buildings:

### Building 59

The Nurses Recreational Building (Building 59) is an approximate 2,195 square foot single-story building with an attached crawl space constructed in 1910.

### Building 67

The Nurses Dormitory Building (Building 67) is an approximate 7,560 square foot two-story building with multiple suites, which were formerly used as a residential area and were constructed in 1910. The building also has a crawl space and an accessible attic.

### Building 70

The Head Nurse's Residence (Building 70) is an approximate 1,510 square foot single-story building with an inaccessible crawl space constructed in 1910.

### Building 149

The Yucca Lodge (Building 149) is an approximate 7,090 square foot two-story structure, which was formerly used as an office or classroom facility and was constructed in 1909 and renovated in the early 2000s.

Currently these four buildings are vacant and uninhabitable due to the presence of ACM and deterioration.

### Building 54

Building 54 is an approximate 4,880 square foot three-story structure located in the north central portion of the Fort Bayard property and is currently being used by the Fort Bayard Historical Preservation Society as a museum.

## 2.3 Environmental Investigations and Clean-up Activities

Weston Solutions, Inc. (Weston) conducted a Phase I Environmental Site Assessment (ESA) of the 7.5-acre parcel containing the nurses' residential buildings area. The Phase I ESA identified ACM and LBP as recognized environmental conditions (RECs) relative to the Site.

To further understand the RECs, a Regulated Building Materials (RBM) Survey and Limited Subsurface Soils Assessment Investigation were completed by AECOM Technical Services, Inc. (AECOM) and Acme Environmental, Inc. (Acme) for the nurses' residential buildings area (Buildings 59, 67, 70, and 149) and the maintenance shop area on December 15 and 16, 2020, in accordance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) regulations. An RBM survey was also performed at the Fort Bayard Museum Building (Building 54) in August 2022 by AECOM and Acme. Federal and state regulatory agencies define ACM as any building material that contains greater than 1 percent (%) asbestos. LBP is defined by the EPA and Housing and Urban Development (HUD) as paint containing lead in surface amounts greater than/or equal to 1.0 milligrams per squared centimeters (mg/cm<sup>2</sup>) when measured by nondestructive X-ray fluorescence (XRF), or greater than 0.5% weight or 5,000 parts per million (ppm) lead, when analyzed by Flame Atomic Absorption Spectroscopy (FAAS).



Interior and exterior building components were surveyed, and homogeneous areas of suspect ACM were visually identified and documented. Suspect ACM samples were collected in general accordance with the sampling protocols outlined in the U.S. EPA regulation 40 Code of Federal Regulations (CFR) 763, the Asbestos Hazard Emergency Response Act (AHERA). Samples were delivered to an accredited laboratory for analysis by polarized light microscopy (PLM).

The lead assessment was carried out by using nondestructive XRF. Interior painted surfaces were analyzed by XRF for potential lead content and test results were measured against the EPA and HUD standards.

Both RBM surveys revealed the presence of both ACM and LBP in building materials in each building, except for the Yucca Lodge building, which was only found to contain LBP.

ACM and LBP abatement is proposed for the existing ACM and LBP buildings 54, 59, 67, 70, and 149 prior to renovation. Additionally, removal of bat guano for Building 67 is necessary, due to bats inhabiting the building.

## 3 Community Relations Background

### 3.1 Community Profile

During the 99 years spanning its establishment as a fort, from 1866 through its closing as a Veterans Administration hospital in 1965, Fort Bayard served as the most prominent evidence of the federal government's role in the development of southwestern New Mexico.

Local citizens and their elected representatives, as well as state officials, have come to appreciate Fort Bayard for its historical significance, as well as its contributions to the local economy. The parade ground, now the site of an annual reenactment of life at frontier forts, the historic sites, and the cemetery are viewed as valuable resources dating to the fort era.

### 3.2 Planned Community Involvement

A public notice will be placed in the Albuquerque Journal, Grant County Beat, and the Silver City Daily Press announcing the intended remedial actions at the Site. The public notice will also be posted at the Site in a conspicuous location. The New Mexico Environmental Department (NMED) will mail the public notices to interested parties.

This 30-day public notice will also include the document repository on this project, including the environmental assessments, risk assessments and other environmental information, and will be located at the Santa Clara Village Hall and is available for public viewing during normal business hours and at other times by appointment.

### 3.3 Community Priorities and Concerns

The following priorities have been previously identified by the community:

1. Building Historic and Architectural Preservation
2. Establishment of organizations such as the National Forest Service as part of the community
3. Health and Safety Concerns

This project will address community issues in several ways:

1. Preservation of historical buildings that were a crucial part of southwestern New Mexico's history;
2. Rehabilitation of the buildings will preserve the historic and architectural character, while also providing a sense of community to the area;
3. Increased occupancy and income, as the rehabilitated buildings can serve as offices to the National Forest Service; and
4. Address and remove any potential environmental health and safety concerns at the Site so the property can be redeveloped.

## 4 Community Relations Program

Throughout the abatement of Fort Bayard, EPA and NMED will conduct a community relations program that will address concerns and issues of importance to the community members and foster communication between EPA, NMED and the community. Community relations activities will be coordinated by Savannah Richards (NMED). All inquiries will be directed to Ms. Richards (see Section 4.3 for contact information).

### 4.1 Community Relations Objectives

The objectives of the community relations program are to:

- **Further Identifying Community Priorities:** Identify community priorities that need to be taken into consideration during the duration of the project. Members of the community should be given the opportunity to provide input on their priorities throughout the project. Involvement strategies should demonstrate how these priorities are being considered in the project design and remediation.
- **Establish Open and Inclusive Communication:** Maintain open communication between NMED, EPA, and the Village of Santa Clara those who live and work near the Site, community leaders, environmentalists, local, state, and federal government agencies and officials, and other interested individuals or groups. This communication will be established early in the remedial action process and will be consistently monitored during the entire project.
- **Engage Public Involvement:** Provide residents, agencies, local officials, civic leaders, and media with accurate, timely information about the remedial activities at the Site. This will provide community members with the tools they need to successfully provide meaningful input for the whole process.

### 4.2 Community Relations Activities

Table 4-1 below summarizes the community relations activities planned for the Fort Bayard project.

**Table 4-1 – Planned Community Relationship Activities**

Activity	Objective	Action
Establish document repository.	To provide public access to project information.	See Appendix B for repository locations.
Develop mailing list.	To identify interested parties who should receive direct mail information.	The mailing list will be prepared by NMED before clean-up activities begin and will be updated as necessary.
Publish public notices.	To meet any regulatory or legal requirements concerning proposed decisions.	Public notices will be published in the Albuquerque Journal, Grant County Beat, and the Silver City Daily Press.
Hold public meeting, as requested.	To present the envisioned project plan, safety procedures, and Analysis of Brownfield Cleanup Alternatives if there is interest from the public.	The meeting will be in combination with existing community meetings held by the Village of Santa Clara and local partners and may be held virtually. Residents can provide feedback during the meeting, through phone or mail.
Respond to inquiries.	To ensure that timely and accurate information is sent to the media.	All requests for information will be responded to promptly.

Update and revise Community Relations Plan as needed.	To address changes in community concern during clean up; update the community relations schedule as needed.	The Plan will be revised to reflect changes in the program and/or schedule.
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### 4.2.1 Document Repositories

The document repository is a valuable source of technical information about the Site and the Brownfields process in general. It will be updated as necessary, with the most current information about the Site activities. The location of the document repository is located in Appendix B.

### 4.2.2 Mailing List

The NMED Brownfields Program works with established community stakeholders to create an updated mailing list to distribute information to the community. This tool will be used to provide information and updates regarding the progress of clean-up activities on the project. The Village of Santa Clara also maintains its own internet web page and provides the community regular newsletters which may be used to provide the public with updates from NMED regarding the Fort Bayard Project and activities at the Site.

### 4.2.3 Ongoing Contacts

While the remedial actions and property redevelopment activities progress, the following individuals will maintain contact with members of the community, either through published information or individual inquiries:

The following NMED staff will address inquiries as it relates to Fort Bayard:

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The following EPA Staff will support NMED with community relations as it relates to Fort Bayard:

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# Appendix A Glossary

## Appendix A – Glossary

**U.S. Environmental Protection Agency:** A federal agency established 40 years ago, whose mission is to protect human health and the environment in the United States of America.

**Brownfield:** Real property, (including industrial, commercial, agricultural, and residential properties), which are abandoned or underutilized, and whose expansion, redevelopment, or reuse may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.

**Federal Brownfields Law:** The Small Business Liability Relief and Brownfields Revitalization Act expanded potential federal assistance for brownfield revitalization, including grants for assessment, cleanup and job training. This law also amended the federal Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

**NMED Brownfields Program:** The NMED Brownfields Program provides essential information and funding for brownfields clean up and redevelopment, with a focus on the concerns and needs of community groups across New Mexico. The Program's goal is to encourage and support effective citizen participation in the redevelopment of brownfields.

**Community Relation Plan (CRP):** A document that outlines EPA and NMED efforts to establish two-way communication with the public. The CRP is designed to create understanding of EPA and NMED programs and related actions, to assure public input, and to make certain that the EPA and NMED is aware of and responsive to public concerns.

**Phase I Environmental Site Assessment (ESA):** A Phase I ESA identifies actual and potential contamination on a piece of real property. This involves the evaluation and reporting of information collected through records review, site visits and interviews. Phase I ESAs are conducted to identify environmental liabilities for property transactions; identify certain baseline environmental conditions; assist in meeting regulatory requirements; and as an initial step in site remediation.

**Document Repository:** Usually a public building that is convenient for local residents where current information, technical reports, and reference documents related to the site are available. Public libraries, city halls, or public schools are examples of document repositories.

# **Appendix B**

## **Document Repository Location**

## Appendix B – Document Repository Location

Santa Clara Village Hall  
516 Fort Bayard Street  
Santa Clara, New Mexico 88026  
575-537-2443



# **Appendix C**

## **NMED Public Involvement Plan**