



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT CAMPBELL
BUILDING 2574 23RD STREET
FORT CAMPBELL, KY 42223-5617

Cultural Resources Program

MEMORANDUM: Public Notice of Adverse Effect to Historic Properties

SUBJECT: Solicitation of public comment to *Adverse Effect* to the WWII German POW Camp D-D (15CH797) archaeological site.

The purpose of this public announcement is to solicit public comments on proposed adverse effects to the Archaeological site of the WWII German POW Camp D-D (15CH797) in accordance with 30 CFR 800.2(d). The Army has determined that this archaeological site is Eligible for listing on the National Register of Historic Places (NRHP) and that Adverse Effects to the property will result from the construction of a new housing area entitled Erevia Park.

This decision of *Adverse Effect to Historic Properties* is detailed in the document entitled: *Undertaking Information and Analysis: Construction of Erevia Park*. Copies of the analysis have been placed in the Clarksville/Montgomery County Public Library, Christian County Public Library, Stewart County Public Library, and the Trigg County Public Library and online under the Public Notice tab at:

<https://home.army.mil/campbell/index.php/cultural-resources/compliance-reports>.

Fort Campbell is soliciting comments from any individuals or organizations that wish to comment on the undertaking, or be involved in the development of a Memorandum of Agreement regarding the undertaking. The comment period will expire April 11, 2021. Please use the attached form to identify if you wish to be a consulting party.

Please direct any questions or comments to Mr. Ronald Grayson, RPA, Fort Campbell Cultural Resources Program Manager, Building 865, 16th Street, Fort Campbell, KY 42223, (270) 412-8174, Email: ronald.i.grayson.civ@mail.mil.

Sincerely,

A handwritten signature in black ink, appearing to read "Ronald Grayson", is positioned above the printed name.

Ronald Grayson, M.A., RPA
Cultural Resources Program Manager

Enclosure

Undertaking Information and Analysis

Construction of Erevia Park

16 March 2021

I. Description of Undertaking

The U.S. Army proposes to construct a new housing development, Erevia Park, on the Fort Campbell Military Installation. The housing area will be built in conjunction with Fort Campbell's Privatized Housing Partner, Campbell Crossing, to better accommodate the needs of soldiers and families on the installation. This undertaking is part of a multi-phase construction project for the installation to increase and modernize the housing capacity at Fort Campbell. Locations, disposition, and plans for future housing on the installation are still being developed, and Fort Campbell will consult with the appropriate State Historic Preservation Office (SHPO) as appropriate as plans progress.

The proposed undertaking is located near the Gate 7 entrance of Fort Campbell in the foot print of the former Lee Village housing development (1953-2010), along Morgan Road, in Christian County, Kentucky (87°27'49.209"W; 36°39'55.186"N).

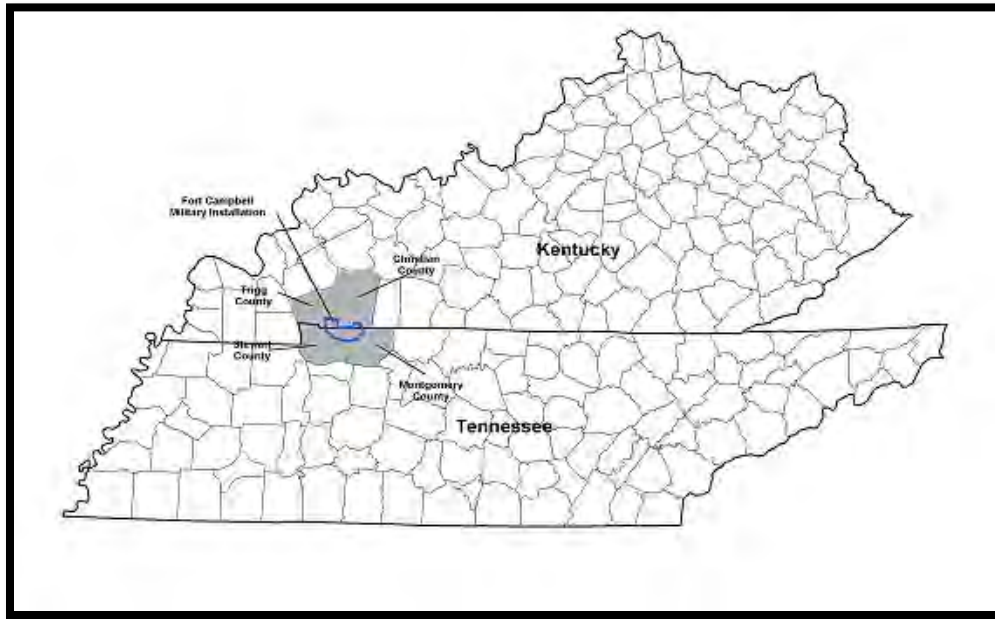


Figure 1: General Location of Fort Campbell

The proposed undertaking will be implemented through the Residential Communities Initiative (RCI) and pursuant to the *Programmatic Agreement Among Fort Campbell, Kentucky, Kentucky State Historic Preservation Officer, Tennessee State Historic Preservation Officer and the Advisory Council on Historic Preservation for the Privatization of Family Housing at Fort Campbell Kentucky (Amended 2019)*. (RCI PA) Campbell Crossing, LLC, maintains all family housing at Fort Campbell. In accordance with Stipulation (III.A), of the aforementioned agreement, all proposed projects that may effect historic properties must be submitted to the Fort Campbell Cultural Resources Manager (CRM) for review.

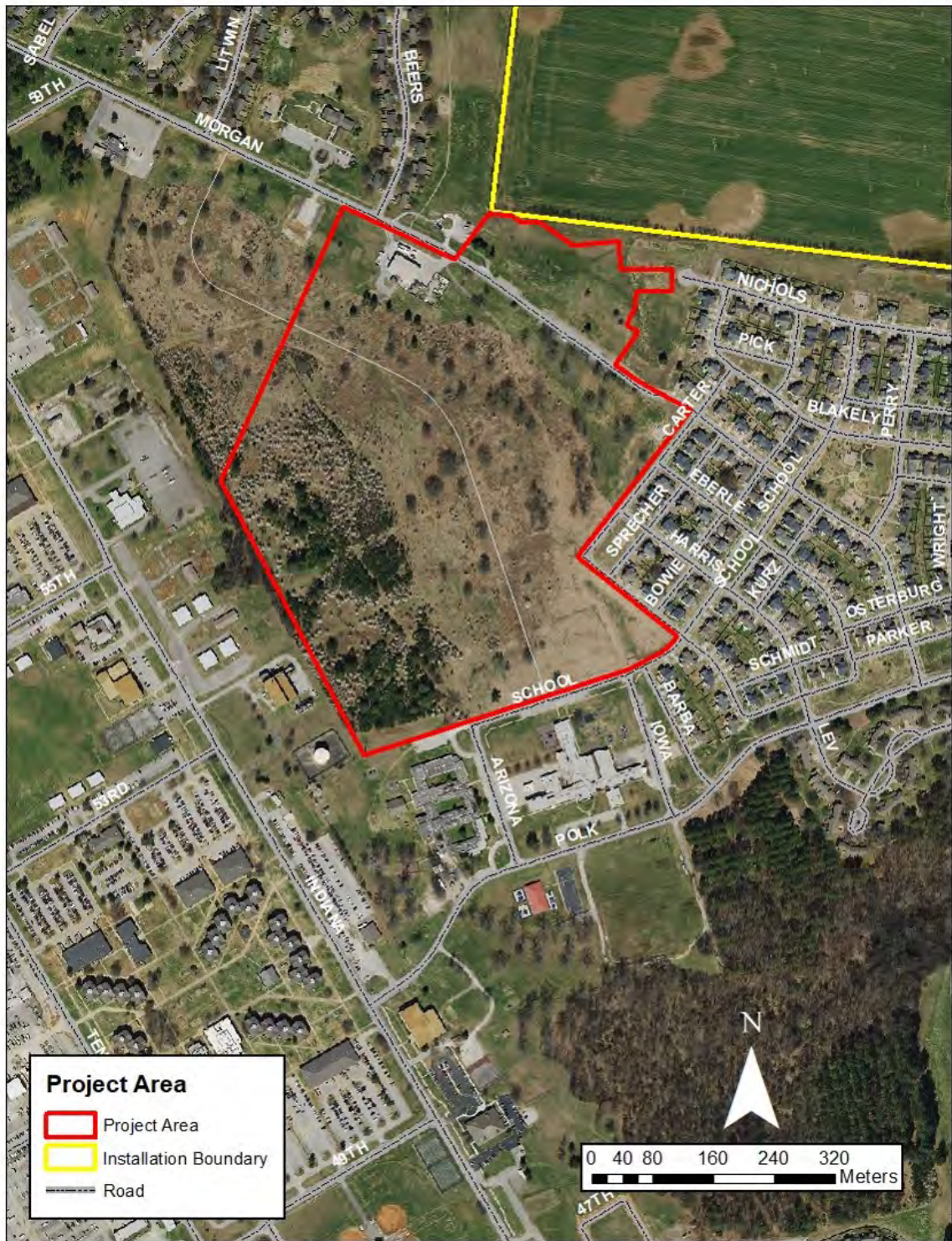


Figure 2: Project Area (in red), Aerial (2018)

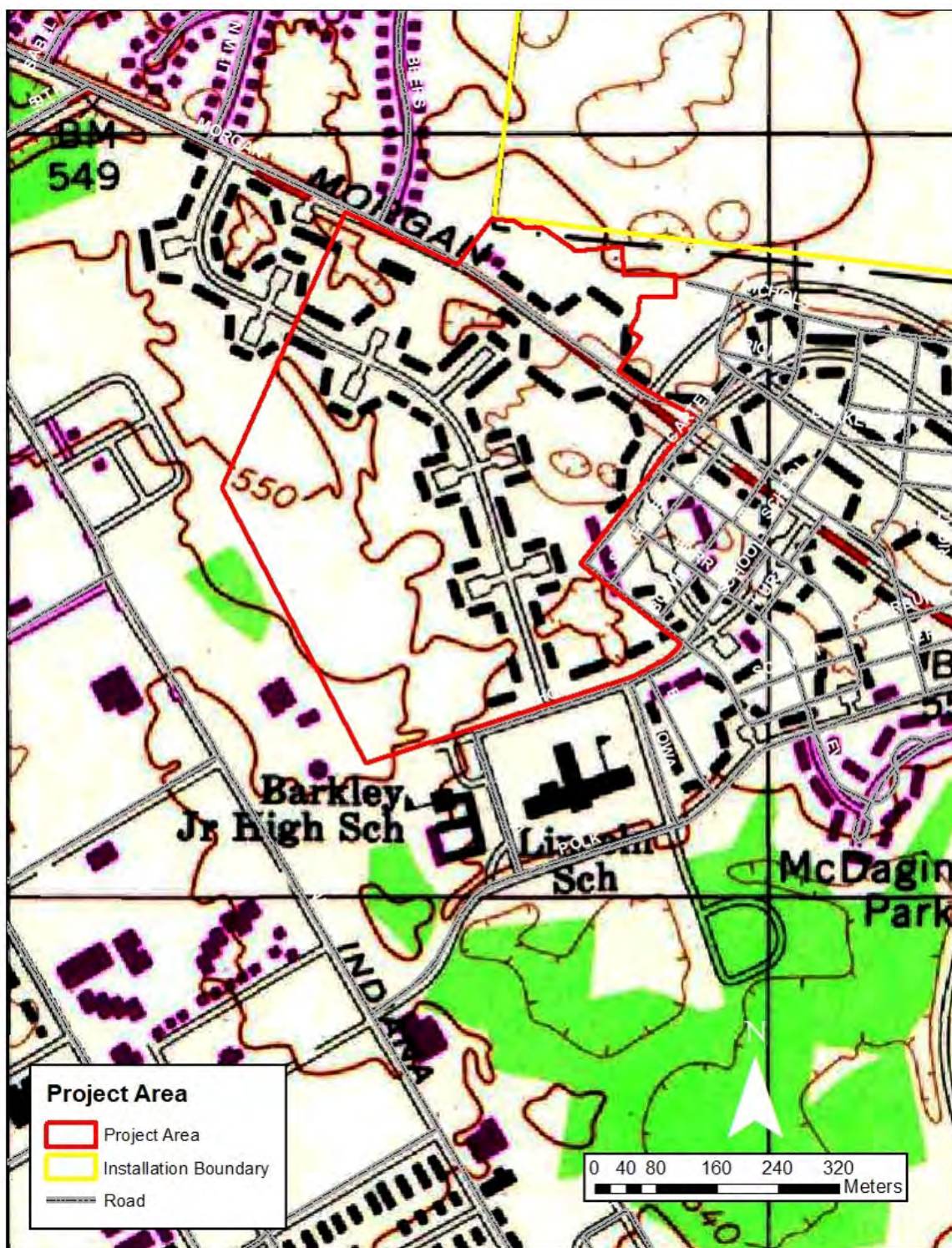


Figure 3: Location of Project Area, USGS Oak Grove Quad

Erevia Park

Campbell Crossing, LLC. Plans on building approximately 300 new housing units within their lease parcel. This construction initiative is part of an overall commitment by the Army to increase the standards of living on military installations for soldiers and their families. The proposed Erevia Park will primarily be for junior enlisted soldiers and their families most in need of updated and proper housing. Although the complete plans are not finalized, the First Phase of the design for 144 homes is complete. (Attachment 1) When complete, Erevia Park will contain approximately 300 duplex homes. (Figure 4) The development will contain all utilities, infrastructure, and amenities of a typical subdivision including small parks and green space set asides. (Figure 5)



Figure 4: Conceptual design of typical Erevia Park Duplex home.



Figure 5: Conceptual Design of Erevia Park development.

II. Areas of Potential Effects

Direct Effect:

It is the determination of the U.S. Army that the Area of Potential Effects (APE) for direct effects for this undertaking is the area directly impacted by the construction of Erevia Park within the area currently leased by Campbell Crossing. The area is largely within the previous footprint of the Lee Park Village, a housing area in use from 1953-2010.



Figure 6: Direct Effect APE, 2018 Aerial

All work, including land clearing, laydown areas, or other ground disturbing activities will occur in the APE for direct effect. (Figure 6)

There are no known historic buildings, objects, Traditional Cultural Properties, districts, or cemeteries within the APE for direct effects. In accordance with Stipulation B.4 of the *Programmatic Agreement Among the United States Army, the State Historic Preservation Officer of Kentucky and the State Historic Preservation Officer of Kentucky Regarding the Operation, Maintenance, and Development of the Fort Campbell Army Installation at Fort Campbell, Kentucky* (OPS PA) (Effective January 2019), the cantonment is excluded from further archaeological survey to identify historic properties because the area has been extensively disturbed by previous development of the original Camp Campbell and subsequent uses by Fort Campbell. The only potential Historic Properties would have been constructed after WWII and will be discussed later.

Indirect Effect:

APE for indirect visual effects for this proposed undertaking is the area around the Campbell Crossing Lease footprint from which the new Erevia Park development will be visible. (Figure 7). The visual indirect effect APE was developed through a combination of pedestrian and windshield survey as well as GIS analysis. The proposed development area is in a section of the installation set aside for housing in the Installation Master Plan. Additionally, this area is a reuse of a previous housing development, Lee Village, which was demolished in 2010. The proposed housing structures and layout will be consistent with other housing on the Installation and not negatively impact any known or suspected historic properties.

The APE for indirect auditory effects for the proposed undertaking were also evaluated for the creation of Erevia Park. The majority of any increased auditory levels will be during the construction phase and be temporary in nature. The proposed development area is in a section of the installation set aside for housing in the Installation Master Plan. Additionally, this area is a reuse of a previous housing development, Lee Village, which was only demolished in 2010. Any increase in auditory levels from normal housing activities would not negatively impact any known or suspected historic properties.

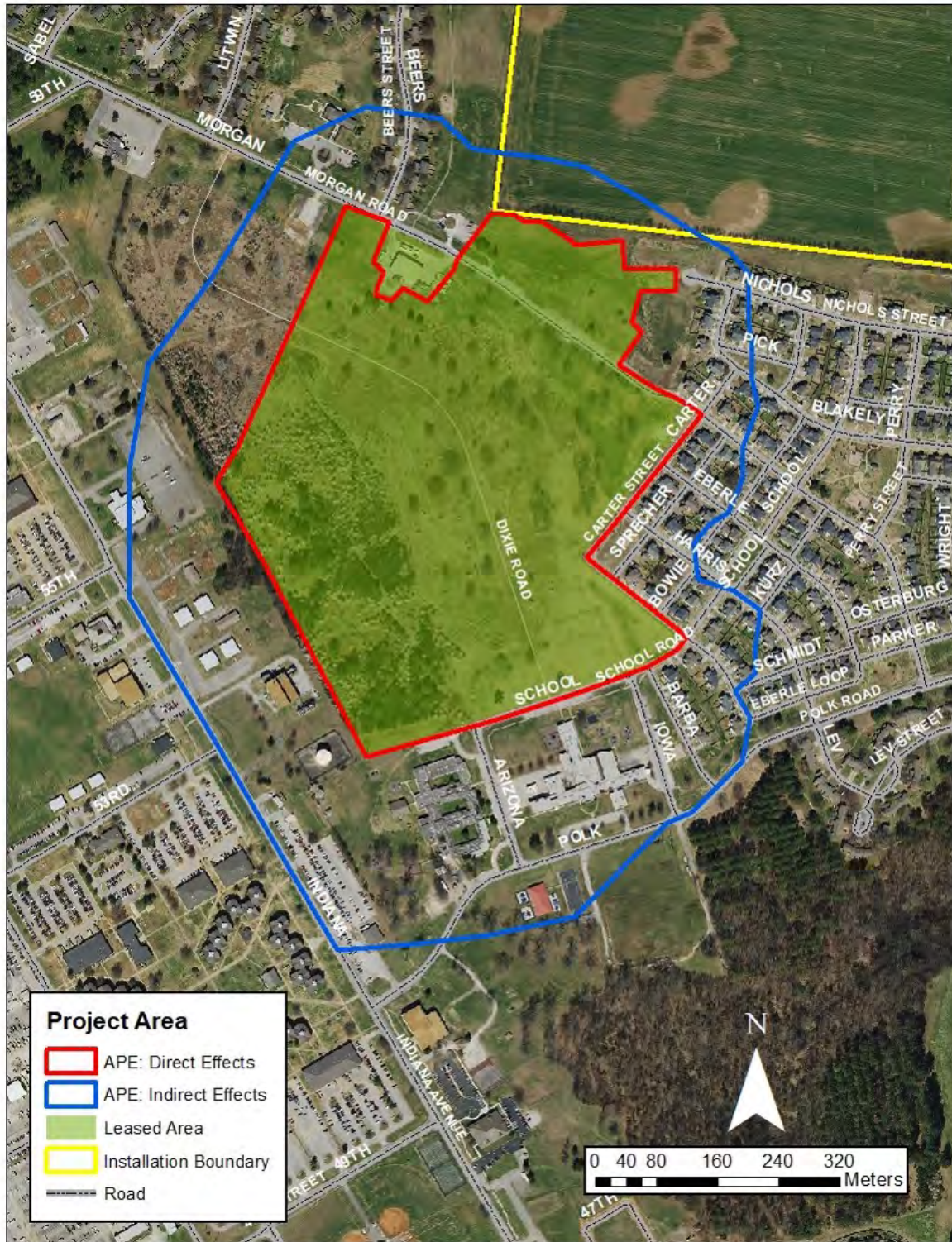


Figure 7: Indirect Effect APE, 2018 Aerial

III. Description of properties effected by this undertaking

Direct Effects

During Historical research in conjunction with review of this proposed housing development, Fort Campbell Cultural Resources Program archaeologists discovered what may be the intact archaeological remains of a WWII German POW internment camp. This camp, Camp D-D, housed approximately 1,000 German Prisoners of War from 1943-1946. It was one of three camps of similar size on the installation. Previous research from *Historic Context for World War II at Ft. Campbell, Kentucky* stated that POW Camp D-D was completely destroyed by the construction of the former Lee Village housing area (Chanchani and Leary: 2006). This context report was provided to the Kentucky SHPO for review and comment in June, 2006, no response or comment was received. The context stated “The first stockade was located in the present day Lee Village area north of the old Hospital.” (Chanchani and Leary 2006: 56). The Fort Campbell Integrated Cultural Resources Management Plan (ICRMP), and all subsequent management decisions in this area were based on this assessment, that the German POW camp was completely destroyed by the former Lee Village in the 1950’s. (Figure 8) Since the entire parcel has been vacant, and no potential construction planned, since the demolition of the former Lee Village in 2010, a more thorough review of the Chanchani and Leary’s statement that POW camp was completely destroyed was not done.

The POW site is being treated as a post-review discovery under RCI PA Section II.B.7 and 36 CFR 800.13(b)(1). The site was identified after conclusion of the Section 106 process and execution of the RCI PA. Construction on the undertaking has not commenced, the site is not identified in the RCI PA, and was only identified in the late stage of this proposed undertaking under the RCI PA. Stipulation I.B of the RCI PA allows for Fort Campbell to identify new historic properties that will be subject to the PA. “*Any new historic properties recognized as such under NRHP criteria A, B, C or D (36CFR60.4) through this process and administered by FCFH will be subject to the provisions of this agreement and added to Attachment A [map showing locations of historic properties].*” This stipulation does not state that such updates to add new historic properties, like the POW site, require an amendment to the PA.

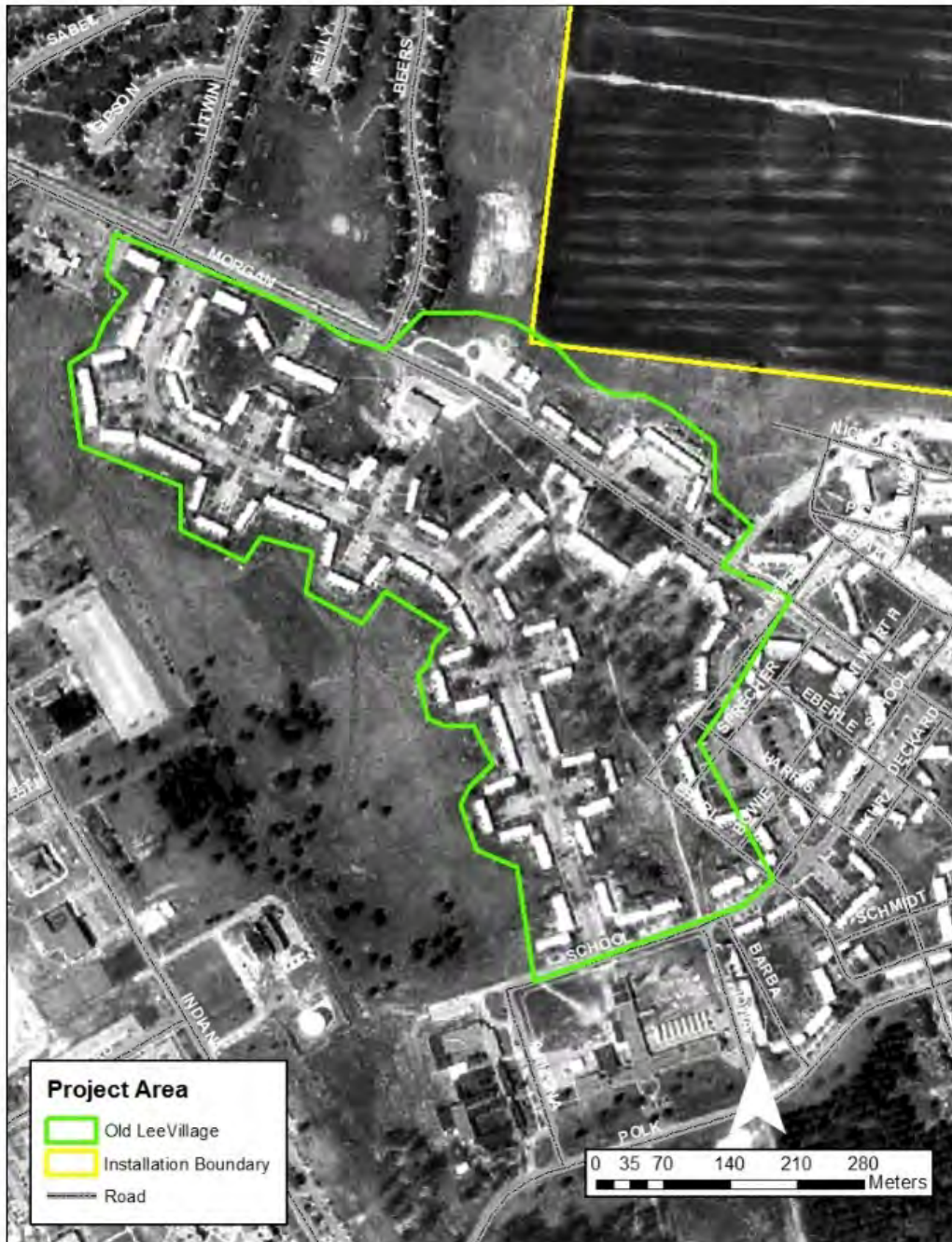


Figure 8: Identification of Old Lee Village Footprint, 1983 Aerial

After the conceptual design from Campbell Crossing was submitted for review, the Fort Campbell Cultural Resources Management Program (CRMP) conducted a more thorough analysis of this area. The analysis was conducted to determine if the assertion that the entirety of the German POW Camp D-D was destroyed by the former Lee Village. Initially, an overlay of the initial POW Camp design was superimposed on the footprint of the Former Lee Village housing development. (Figure 9) This preliminary analysis seemed to indicate that the former Lee Village did not entirely encompass the German POW Camp D-D site.

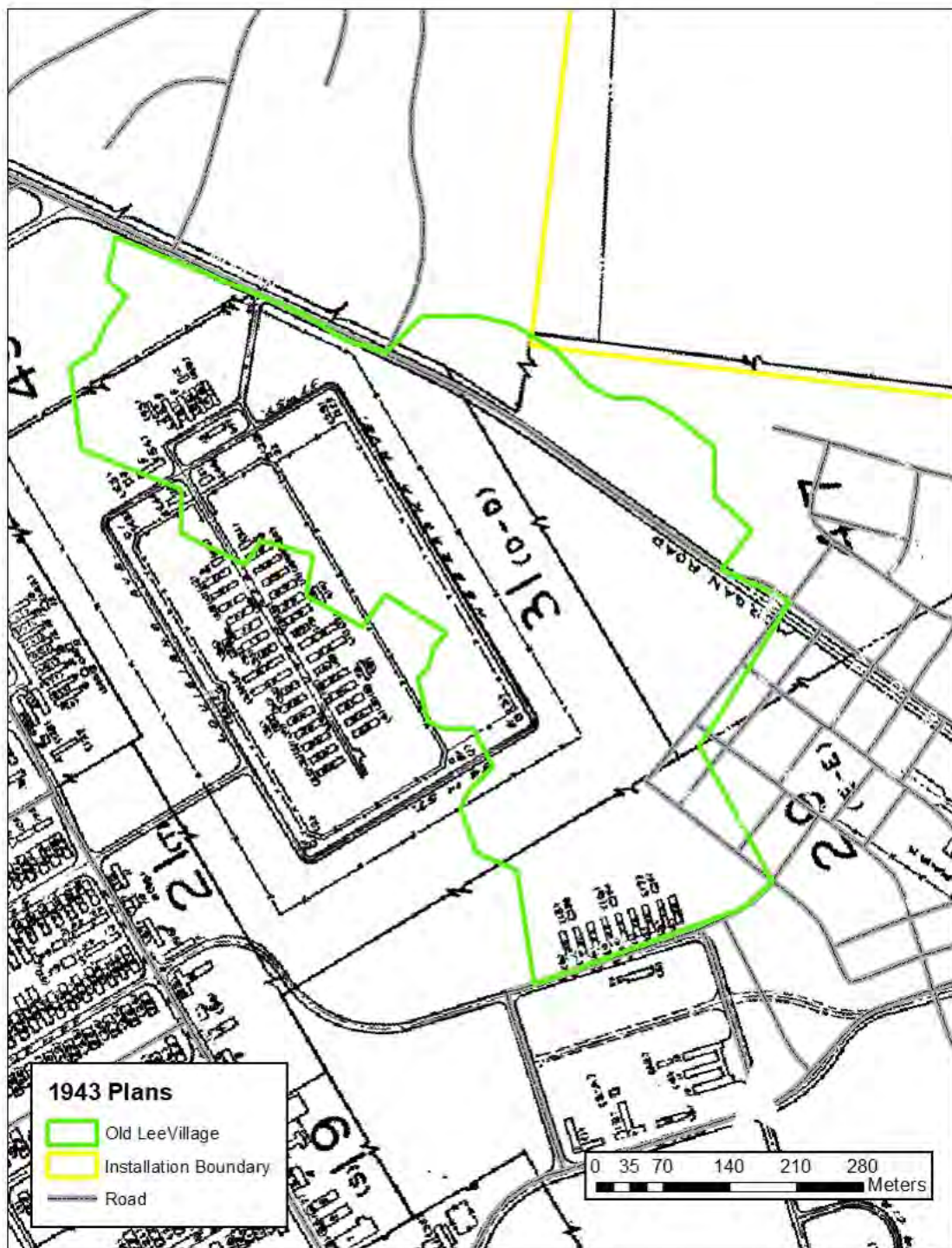


Figure 9: Old Lee Village footprint on 1943 plans for POW Camp D-D

Analysis of footprint, and other historic aerial imagery appeared to indicate that the majority of the structures associated with the POW camp were not actually destroyed by the construction of Lee Village in the 1950's.

Historic aerial analysis was conducted to determine exactly which portions of the POW Camp D-D may be intact. It is apparent that in 1949, Figure 10, that most of the structures have been demolished and/or removed from the Camp site. However, it should be noted that there appears to be very little ground disturbance associated with the decommissioning of the Camp. This relatively light impact is consistent with other POW camp decommissioning in Missouri (Naglich et al: 2011), Arkansas (Buchner & Albertson: 2005), and Colorado (Connor et al: 1999). Similar excavations at these comparable POW camps did not recover many artifacts. These excavations largely documented *in situ* footers, foundations, utilities, etc.

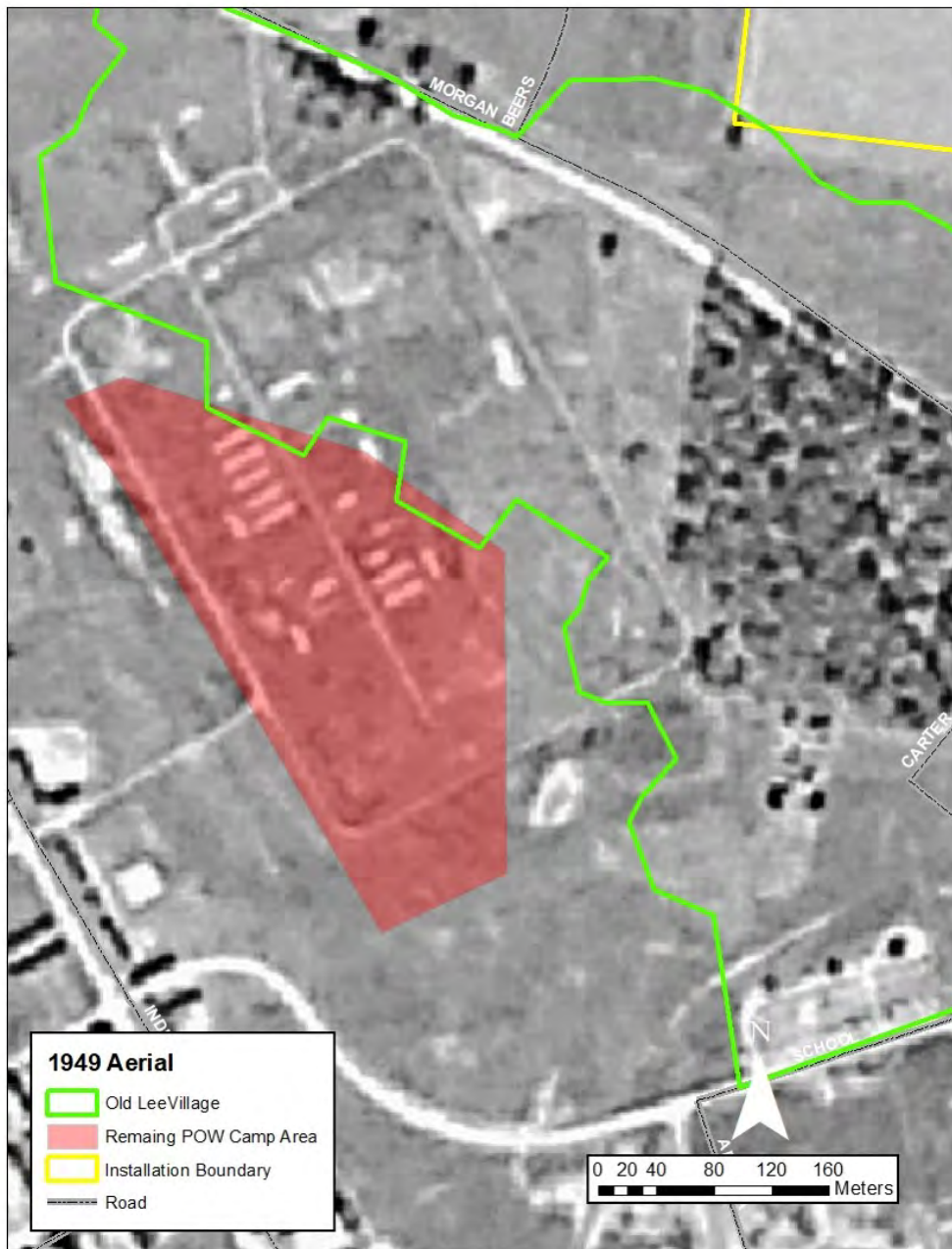


Figure 10: 1949 Aerial Image of POW Camp D-D.

The construction of the former Lee Village housing development, completed in 1953, does seem to have severely impacted the integrity of much of the POW camp as seen in the 1955 Aerial. (Figure 11) It appears that this image was taken after the barracks were removed and the grass has not grown up yet, indicating that the barracks were not demolished via heavy earth moving activities. Analysis of other aerial images from later dates, indicates that heavy ground disturbance was limited to what was in the 1955 aerial image. A review of Fort Campbell Real Property records also does not indicate that any construction occurred on the intact POW Camp site. Fort Campbell developed the boundary for the German POW Camp D-D Archaeological site (15CH797) from these data.

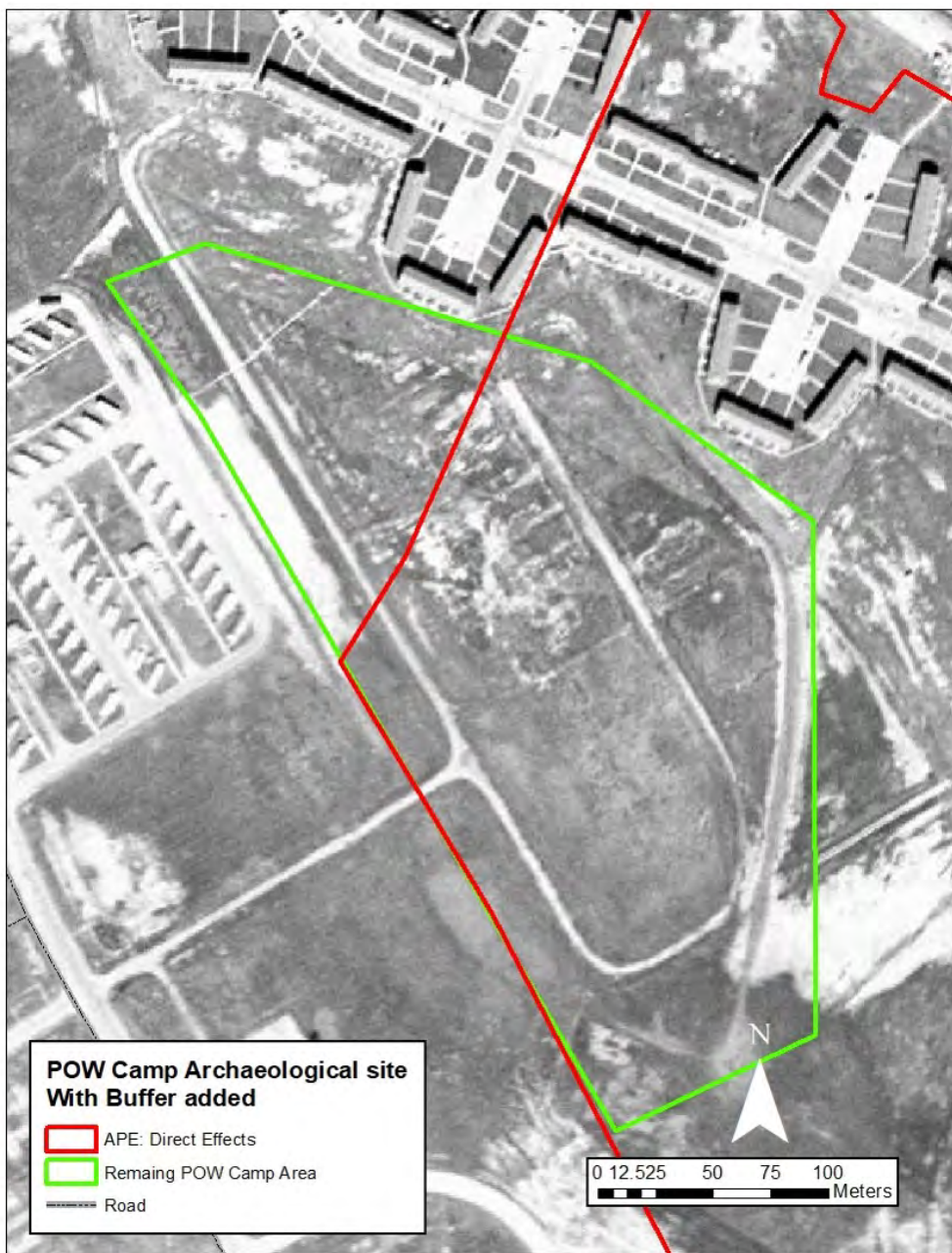


Figure 11: 1955 Aerial Image of the former Lee Village and POW Camp D-D.

A pedestrian survey of the potentially intact area was conducted by Fort Campbell CRMP personnel who meet or exceed the Secretary of the Interior's Standards in Archaeology. The suspected area, Figure 15, did not appear to be heavily modified and contained surface artifacts as well as in-situ municipal features including a fire hydrant (Figures 12 and 14).

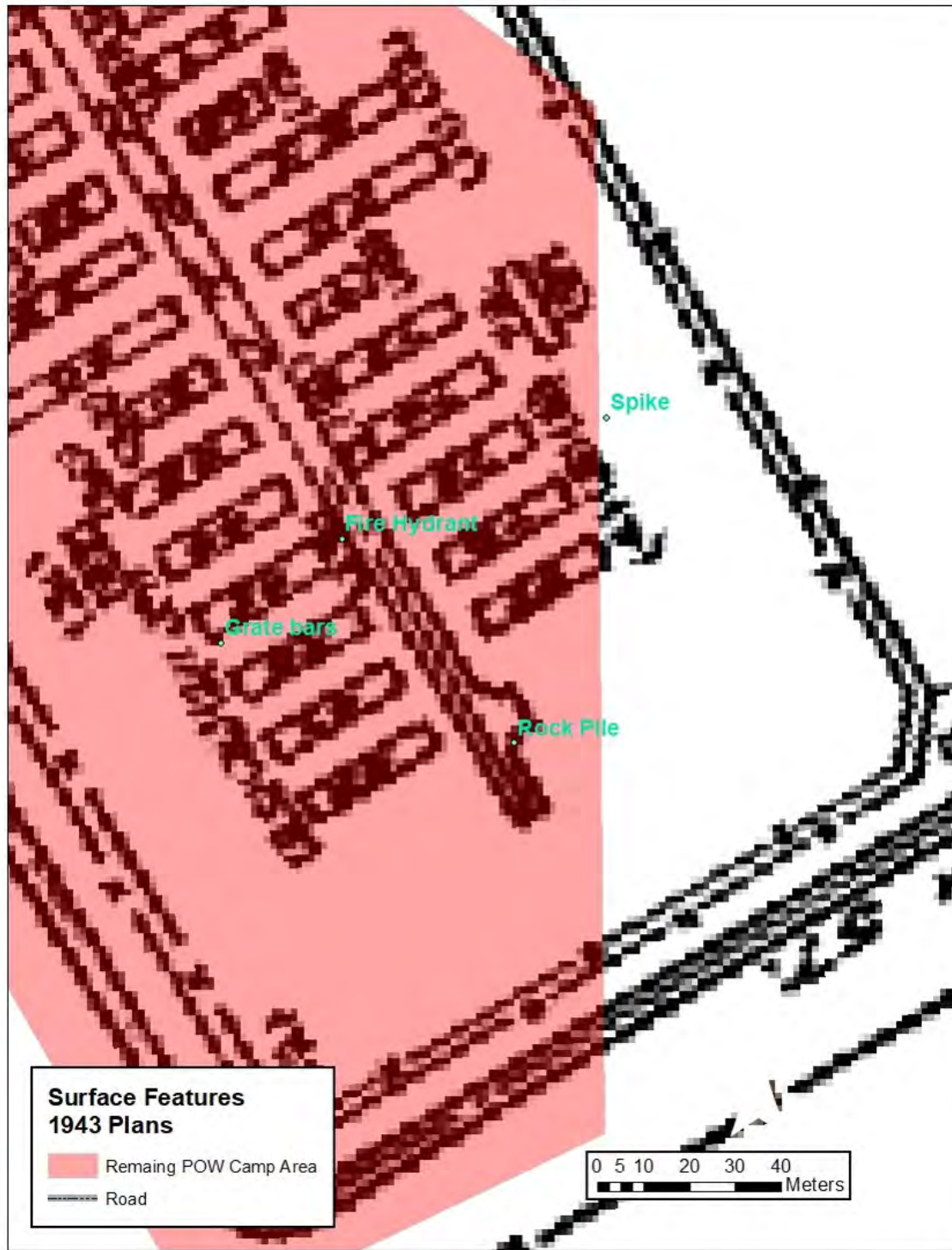


Figure 12: Locations of surface finds on 1943 Plans for Camp D-D.



Figure 13: Metal Bars, previously attached to culvert or window.



Figure 14: Intact fire hydrant *in situ*.

Due to the combination of historic aerial analysis and pedestrian survey, Fort Campbell has concluded that there is a high likelihood of intact archaeological remains of the WWII German POW Camp D-D (15CH797). Archaeological excavations at other comparable POW camps (Naglich et al: 2011, Buchner & Albertson: 2005, and Connor et al: 1999) did not recover many artifacts other than architectural features. These excavations largely documented *in situ* footers, foundations, utilities, etc. used to determine that the sites were intact and retained sufficient integrity for determination of Eligibility. Additional, larger scale, excavations at 15CH797 would likely locate similar architectural features but are unlikely to appreciably increase the understanding and information of the site as a whole.

In World War II 375,000 German prisoners of war, and 60,000 Italian and Japanese prisoners of war were interned within the United States (Krammer 1979:256). “During World War II the U.S. successfully held over 425,000 Axis personnel in 155 base camps and more than 500 branch camps within the continental United States” (Thompson 2008:207). Within Kentucky there were a total of nine (9) permanent base camps, three each at Fort Knox, Camp Breckenridge, and Camp Campbell (Thompson 2008: 3). The Camps within Fort Knox have been completely destroyed (Cruciotti et al: 2006). Any archaeological remains of the POW camps from Camp Breckenridge have not been recorded with the Kentucky Office of State Archaeology (P. Mink Personal communication: February 12, 2021). Camp Breckenridge was removed from federal ownership after WWII and is currently on private land and heavily developed. It is likely that the WWII German POW Camp D-D site (15CH797) is the last physical archaeological example of this site type in Kentucky.

There were four (4) installations that had Camps dedicated to the internment of “Anti-Nazi” soldiers; Fort Devens (MA), Camp McCain (MS), Camp Ruston (LA), and Camp Campbell (KY) (Thompson 2008: 106). WWII German POW Camp D-D was specifically built to house Anti-Nazi prisoners to protect them from Nazi retaliation. (Thompson 2010: 65).

Although the integrity of 15CH797 has not been conclusively determined through archaeological investigation, there is sufficient information for the Army to determine that portions not directly impacted by the construction of the former Lee Village retain integrity. (Figure 15)

The POW site (15CH797) is assumed to be eligible under the National Register pursuant to 36 CFR 800.13(c), under National Register Criteria A and D, at the state and local level at a minimum.

The area depicted in Figure 15, depicts the area with a 50 foot buffer around what is intact. This 15 acre area would have likely contained areas of perimeter fencing, guard towers, barracks, Latrines, and possibly other specialty buildings.



Figure 15: Areal of POW Camp D-D archaeological site (15CH797).

Indirect Effects

Lincoln Elementary, Figure 16, was recommended Eligible for listing in the NRHP by CH2M HILL in 2013 (Price and Nolan-Wheatley 2013). The Kentucky State Historic Preservation Office (SHPO) concurred with the Army's determination that Lincoln Elementary (CH 439) is Eligible for listing in the NRHP in a letter dated August 30, 2013. Lincoln is currently undergoing renovation for conversion into office space for the Directorate of Public Works (DPW). These renovations are within the Secretary of the Interior's Standards for Rehabilitation. The SHPO concurred that the renovations will have no Adverse Effect to Historic Properties in a letter dated October 30, 2020.



Figure 16: Exterior Façade of Lincoln Elementary, Facing north.



Figure 17: Rear of Lincoln Elementary from the Project Area, Facing South.



Figure 18: View of the Project Area from Lincoln Elementary, Facing North.

Building 4199, Figure 19, is a general purpose administration building built in 1960. This building was evaluated for listing in the National Register of Historic Places in a report entitled *Architectural Survey and Evaluation of Two On Post Structures, Fort Campbell, Christian County Kentucky* (Van Steen et al: 2015). The Kentucky SHPO concurred with the Army determination that building 4199 is Not Eligible for listing in the NRHP in a letter dated September 4, 2015. There has been no additional information that would change this determination. Building 4199 will remain and be utilized for storage for housing activities.



Figure 19: View of the exterior of Building 4199 from the Project Area, Facing North.



Figure 20: View of the Project Area from building 4199, Facing South

A total of 67 additional buildings are located within the APE for indirect effects for the proposed undertaking excluding Building 4199 and Lincoln Elementary which are discussed in this section above (Figure 21). Nine (9) of these buildings are located North of the project and are in the indirect effect APE. These are housing units built in 1978 as part of Pierce Village. An additional administrative building built in 2013 is part of the housing area as well.

A total of 45 buildings lie to the east of the project area and are within the indirect effect APE. These are housing units built in 2009 as part of the new Lee Village housing area.

There are three (3) outbuildings to the south of the project area are associated with both Lincoln (1952) and the former Barkley (1954) Elementary schools built in 1984, 2006, and 2007 respectively.

Additional buildings within the indirect effect APE to the southwest include: a maintenance shop (1984), Tower (1977), Energy Plant (1977), MWR facility “the Zone” (1984), and six (6) temporary buildings assembled in 2004.

These buildings are exempt from further review under Stipulation C.1.n of the OPS PA since they are less than 50 years of age. They also do not require further review pursuant to the *Programmatic Agreement among Fort Campbell, Kentucky, Kentucky State Historic Preservation Officer, Tennessee State Historic Preservation Officer, and the Advisory Council on Historic Preservation for the Privatization of Family Housing at Fort Campbell, Kentucky* (RCI PA) (Effective 2019).

Although apparent in the 2018 aerial photographs used in this consultation, (Figure 21) Barkley elementary has previously been demolished. Barkley Elementary was demolished in 2018-2019 as part of the DoDEA program of school revitalization. The Kentucky SHPO was consulted on the demolition of Barkley Elementary, specifically the indirect effect to Lincoln Elementary. The Kentucky SHPO concurred with Fort Campbell’s determination of *No Adverse Effect to Historic Properties* in a letter dated January 10, 2014 (no KHC # identified on the response letter). New aerial photographs have not been taken since the demolition and Barkley Elementary school is depicted in the APE maps. (Figure 21)



Figure 21: Specific buildings and neighborhoods in this consultation, 2018 Aerial.

IV. Application of Criteria of Adverse Effect

Direct effects of the undertaking are determined to be the construction of the new privatized housing development entitled Erevia Park. It is the determination of the Army that due to the immediate and overwhelming need for adequate housing for junior enlisted soldiers and their families, the construction of Erevia Park must begin immediately and in full. The well documented housing crisis on Army installations is a DoD and Congressional priority and must be remedied by the construction of new housing without delay. Modification of the existing ground lease would require a significant delay in construction and is unacceptable to the Army. Delaying construction of the development as a whole to allow for archaeological evaluation of 15CH797 would require enlisted soldiers and their families to remain in substandard housing longer and is unacceptable to the Army. Phased construction of the development to allow for archaeological evaluation of 15CH797 would also cause a delay in construction due to the need to redesign Phase I of the housing project and is unacceptable to the Army.

Although the subsurface integrity of 15CH797 has not been archaeologically tested, there is sufficient information for the Army to determine that portions retain integrity and should be treated as a Historic Property. The association with WWII German Prisoner of War internment 15CH797 is assumed to be eligible under the National Register pursuant to 36 CFR 800.13(c), under National Register Criteria A and D, at the state and local level at a minimum.

Because the significance of 15CH797 is primarily from its place in history and association with the internment of WWII German POWs, large scale archaeological excavations are not needed. Similar excavations at other comparable POW camps, (Naglich et al: 2011, Buchner & Albertson: 2005, and Connor et al: 1999), did not recover many artifacts. These excavations largely documented *in situ* footers, foundations, utilities, etc. The archaeological data was used to determine that the sites were intact and retained sufficient integrity for determination of Eligibility. Additional, larger scale, excavations at 15CH797 would likely locate similar architectural features but are unlikely to appreciably increase the understanding and information of the site as a whole. Fort Campbell will conduct limited, targeted, excavations on areas with suspected integrity which may contain intact deposits of personal artifacts prior to construction of Erevia Park for potential use in interpretive materials, exhibits, etc.

Construction of Erevia Park will substantially impact most of the remaining portions of the WWII German POW camp (15CH797) and constitute an *Adverse Effect to Historic Properties*. Fort Campbell plans to prepare a Memorandum of Agreement IAW 36 CFR 800.6(c), and plans to address the impacts through mitigative measures. Any potential mitigative measures will be determined through the development of an MOA with the Kentucky SHPO, ACHP, or both.

Lincoln Elementary is the only previously known *Historic Property* visually effected by this undertaking. The school was originally designed as a community Elementary school to service soldier families in the surrounding housing areas. The former Lee Village was previously adjacent to the school from 1953 until 2010. The new Erevia Park will be largely within the previous housing footprint and will bring the traditional setting back to when the school was in operation, and therefore have *No Adverse Effect* to Lincoln Elementary School.

One other building is more than 50 years old, 4199, and has been determined Not Eligible for Listing in the NRHP. A total of 67 additional buildings are located within the APE for indirect effects for the proposed undertaking, excluding Building 4199 and Lincoln Elementary. All other buildings are less than 50 years old.

The APE for indirect auditory effects for the proposed undertaking were also evaluated for the construction and use of Erevia Park. The majority of increased auditory levels will be during the construction phase and be temporary in nature. The proposed development area is in a section of the installation set aside for housing in the Installation Master Plan. Additionally, this area is a reuse of a previous housing development, former Lee Village, which was demolished in 2010. Any increase in auditory levels from normal housing activities would not negatively impact any known or suspected historic properties

V. Determination of Effect to Historic Properties

In accordance with the RCI PA Section II.B.7, and 36 CFR 800.13 (b)(1), Fort Campbell is making a finding of Adverse Effect and is consulting with the SHPO and the Advisory Council on Historic Preservation (ACHP) to resolve the adverse effect under 36 CFR 800.6.

Due to the time sensitive nature of this undertaking, and the late identification of a Historic Property within the Direct effect APE, the Army will be inviting the ACHP in conjunction with the Kentucky SHPO to participate in the consultation per 36 CFR 800.6(a)(1)(i)(A). Fort Campbell will also initiate installation public notice processes to involve the public per 36 CFR 800.6(a)(4).

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2015 *Architectural Survey and Evaluation of Two On Post Structures, Fort Campbell, Christian County Kentucky*, Louis Berger.



**DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT CAMPBELL
BUILDING 2574 23rd STREET
FORT CAMPBELL, KENTUCKY 42223-5617**

March 16, 2021

Office of the Garrison Commander

Mr. Craig A. Potts, Executive Director
Kentucky Heritage Council
State Historic Preservation Office
300 Washington Street
Frankfort, Kentucky 40601

Dear Mr. Potts:

The US Army proposes to construct a new housing development, Erevia Park, on the Fort Campbell Military Installation. The proposed undertaking will have impacts to Lincoln Elementary school (CH439) and the WWII German POW Camp D-D (15CH797). The proposed undertaking is located within Christian County, Kentucky.

The proposed undertaking will be implemented through the Residential Communities Initiative (RCI) and pursuant to the *Programmatic Agreement Among Fort Campbell, Kentucky, Kentucky State Historic Preservation Officer, Tennessee State Historic Preservation Officer and the Advisory Council on Historic Preservation for the Privatization of Family Housing at Fort Campbell Kentucky* (Amended 2019). The archaeological site of the WWII German POW Camp D-D (15CH797) was discovered late in the planning process and is being treated as a post-review discovery under the aforementioned agreement Section II.B.7 and 36 CFR 800.13(b)(1).

The Army has determined that due to the immediate and overwhelming need for adequate housing for junior enlisted soldiers and their families, the construction of Erevia Park must begin immediately and in full. The well documented housing crisis on Army installations is a DoD and Congressional priority and must be remedied by the construction of new housing without delay. Modification of the existing ground lease would require a significant delay in construction and is unacceptable to the Army.

Delaying construction of the development as a whole to allow for archaeological evaluation of 15CH797 would require enlisted soldiers and their families to remain in substandard housing longer and is unacceptable to the Army. Phased construction of the development to allow for archaeological evaluation of 15CH797 would also cause a delay in construction and is unacceptable to the Army.

The WWII German POW Camp D-D site (15CH797) is assumed to be eligible under the National Register pursuant to 36 CFR 800.13(c), under National Register Criteria A and D, at the state and local level at a minimum.

In accordance with the Section II.B.7, and 36 CFR 800.13 (b)(1), Fort Campbell is making a finding of Adverse Effect and is consulting with your office and the Advisory Council on Historic Preservation (ACHP) to resolve the adverse effect under 36 CFR 800.6.

Due to the time sensitive nature of this undertaking, and the late identification of a Historic Property within the Direct effect APE, the Army will be inviting the ACHP in conjunction with the your office to participate in the consultation per 36 CFR 800.6(a)(1)(i)(A). Fort Campbell will also initiate installation public notice processes to involve the public per 36 CFR 800.6(a)(4).

Please review the enclosed information supporting that determination and respond as to whether you concur with the determination. Fort Campbell will begin the process necessary to immediately develop a Memorandum of Agreement to adequately resolve the Adverse Effects of this undertaking.

If you have any further questions, regarding this matter, please contact Mr. Ronald Grayson, Cultural Resources Program Manager at ronald.i.grayson.civ@mail.mil, or telephone 270-412-8174.

Sincerely,



Jeremy D. Bell
Colonel, U.S. Army
Commanding

Enclosure



DEPARTMENT OF THE ARMY
HEADQUARTERS, UNITED STATES ARMY GARRISON, FORT CAMPBELL
2574 23rd STREET
FORT CAMPBELL, KENTUCKY 42223-5617

March 16, 2021

Office of the Garrison Commander

Mr. Reid Nelson
Advisory Council on Historic Preservation
401 F Street NW., Suite 308
Washington, DC 20001-2637

Dear Mr. Nelson:

The US Army proposes to construct a new housing development, Erevia Park, on the Fort Campbell Military Installation. The proposed undertaking will have impacts to Lincoln Elementary school (CH439) and the WWII German POW Camp D-D (15CH797). The proposed undertaking is located within Christian County, Kentucky.

The proposed undertaking will be implemented through the Residential Communities Initiative (RCI) and pursuant to the *Programmatic Agreement Among Fort Campbell, Kentucky, Kentucky State Historic Preservation Officer, Tennessee State Historic Preservation Officer and the Advisory Council on Historic Preservation for the Privatization of Family Housing at Fort Campbell Kentucky* (Amended 2019). The archaeological site of the WWII German POW Camp D-D (15CH797) was discovered late in the planning process and is being treated as a post-review discovery under the aforementioned agreement Section II.B.7 and 36 CFR 800.13(b)(1).

The Army has determined that due to the immediate and overwhelming need for adequate housing for junior enlisted soldiers and their families, the construction of Erevia Park must begin immediately and in full. The well documented housing crisis on Army installations is a DoD and Congressional priority and must be remedied by the construction of new housing without delay. Modification of the existing ground lease would require a significant delay in construction and is unacceptable to the Army.

Delaying construction of the development as a whole to allow for archaeological evaluation of 15CH797 would require enlisted soldiers and their families to remain in substandard housing longer and is unacceptable to the Army. Phased construction of the development to allow for archaeological evaluation of 15CH797 would also cause a delay in construction and is unacceptable to the Army.

The WWII German POW Camp D-D site (15CH797) is assumed to be eligible under the National Register pursuant to 36 CFR 800.13(c), under National Register Criteria A and D, at the state and local level at a minimum.

In accordance with the Section II.B.7, and 36 CFR 800.13 (b)(1), Fort Campbell is making a finding of Adverse Effect and is informing your office of the impacts.

Due to the time sensitive nature of this undertaking, and the late identification of a Historic Property within the Direct effect APE, the Army is inviting your participation in accordance with 36 CFR 800.6(a)(1). Fort Campbell is requesting your participation at the same time as the Kentucky SHPO is informed of the Adverse Effect. Fort Campbell will also initiate installation public notice processes to involve the public per 36 CFR 800.6(a)(4).

Please review the enclosed information supporting that determination and respond as to whether you will participate in the development of a Memorandum of Agreement to adequately resolve the Adverse Effects of this undertaking.

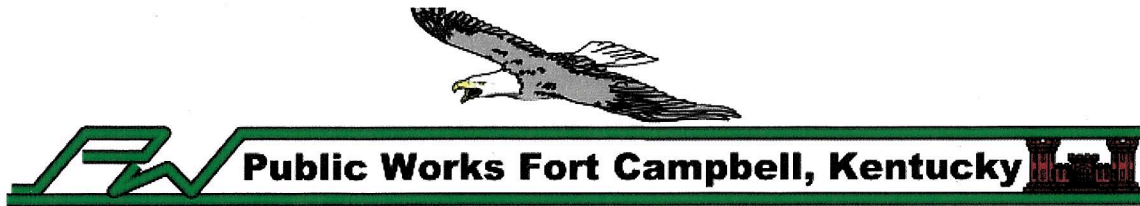
If you have any further questions, regarding this matter, please contact Mr. Ronald Grayson, Cultural Resources Program Manager at ronald.i.grayson.civ@mail.mil, or telephone 270-412-8174.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Bell".

Jeremy D. Bell
Colonel, U.S. Army
Commanding

Enclosure



**Application to be Considered a Section 106 Consulting Party for
Historic Property Impacts**

-Please Print-

Organization	
Name	
Title	
Address	
Phone	
E-mail	

Section 106 of the National Historic Preservation Act (NHPA) requires Federal agencies to consider the effects of their actions on historic properties

The Section 106 process also encourages the incorporation of historic preservation values into project planning through consultation among parties with an interest in the effects of the undertaking on historic properties. Consultation is a dynamic good-faith process of discussing options, considering multiple views, and seeking agreement among a variety of parties, your active participation and constructive comments will be expected through the process.

Please summarize your interest in historic properties as related to this project:

Please mail or fax to:

Department of Army
Directorate of Public Works
ATTN: Ronald Grayson, M.A., RPA
Building 865
16th Street
Fort Campbell, Kentucky 42223
FAX 270-412-6810