

**CULTURAL RESOURCE MANAGEMENT PROGRAM
AT FORT CAMPBELL, KENTUCKY / TENNESSEE
Clarksville Base Historic District
2019**

By
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Cultural Resource Program Manager

Directorate of Public Works
Environmental Division
IMCB-PWE
Conservation Branch
Fort Campbell, KY

Report Submitted to:
IMCOM Readiness
Installation Management Command
Fort Sam Houston, TX

Advisory Council on Historic Preservation (ACHP)
Washington, DC

Tennessee Historical Commission
Department of Environment and Conservation
Nashville, TN

Enclosures:

Attachment 1: REC 19-201 Compliance Document

Attachment 2: REC 20-016 Compliance Document

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Introduction

In accordance with Stipulation (H) of the *Amended Programmatic Agreement Between Fort Campbell and the Tennessee State Historic Preservation Office Regarding Development, Construction and Operations at Clarksville Base Historic District* (amended December 2019), an annual report of all projects and activities carried out by Fort Campbell and reviewed by the Cultural Resource Management Program (CRMP), at Clarksville Base Historic District must be submitted to the Advisory Council on Historic Preservation (ACHP), Installation Management Command-Readiness, and the Tennessee State Historic Preservation Office (SHPO). The following report includes a list of projects and activities that have been reviewed for possible effects to *Historic Properties*, a determination of those effects, a summary of mitigation and/or treatment measures, and a summary of consultation activities performed by the CRMP in 2019. This report also includes maps of all areas effected by undertakings.

Clarksville Base Historic District

Overview

Fort Campbell has an additional Programmatic Agreement (*Programmatic Agreement Between Fort Campbell and the Tennessee State Historic Preservation Office Regarding Development, Construction and Operations at Clarksville Base Historic District* (Effective January, 2009)) for undertakings within the Clarksville Base Historic District in Tennessee. This agreement was amended in December 2019 and is now valid through December 2020. The CRMP plans to include management of the Clarksville Base Historic District in the new programmatic agreement for base operations. Installation Management Command (IMCOM) is currently working to develop a standardized PA template for all Army IMCOM installations. Fort Campbell will continue to operate under the existing agreement, amended as necessary, until the standardized template is developed. Fort Campbell will then begin the consultation process to develop a PA in the new format to comply with the NHPA.

For management purposes, the CBHD is separated into the Preservation Area and the Development Area (Figure 1). Information on contributing resources in the CBHD are kept on file in the cultural resources database. The district is *Eligible* for listing in the NRHP under Criterion A for its association with the construction and storage of nuclear weapons from the early Cold War.

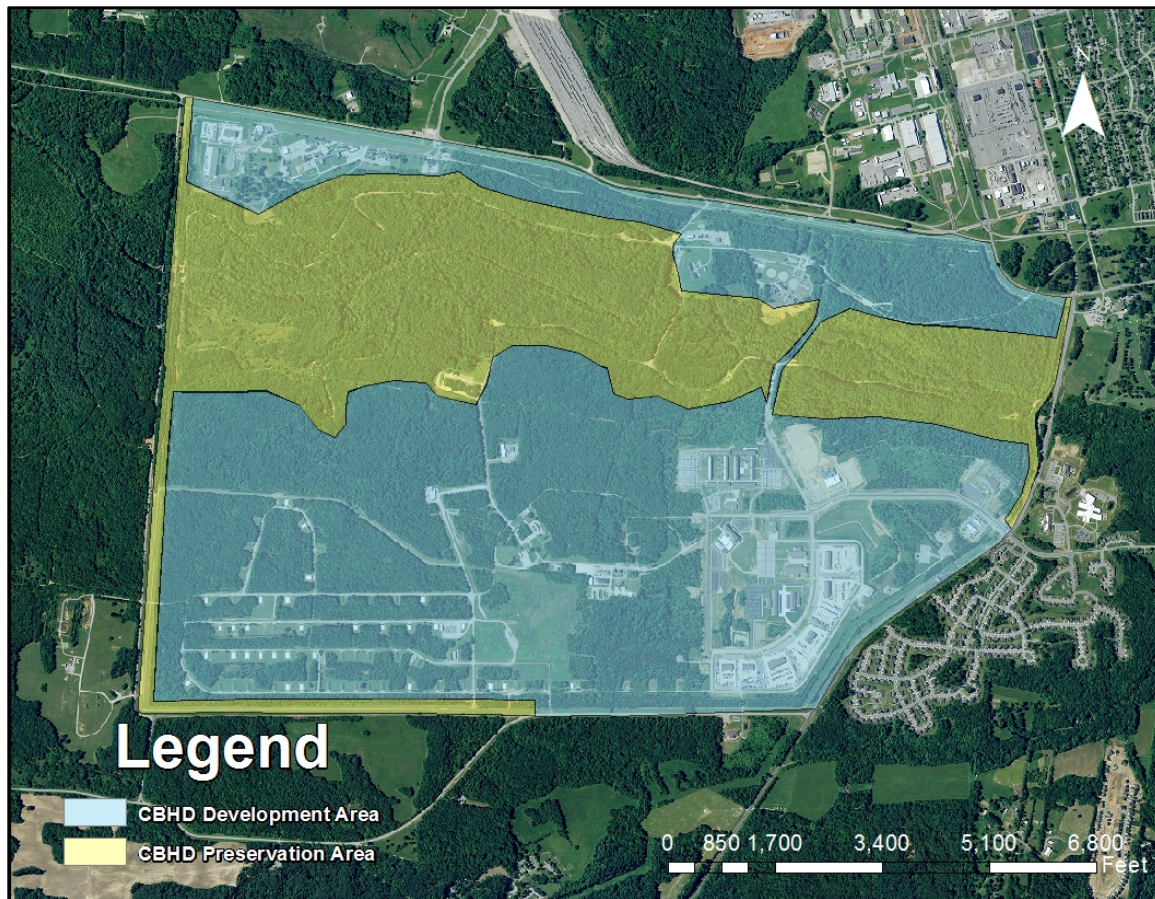


Figure 1. Clarksville Base Development and Preservation Areas

Project Review

National Environmental Policy Act (NEPA) Review

Fort Campbell primarily uses internal NEPA review as a clearing house for all projects within the installation. A critical part of the NEPA process is reviewing projects for potential effects to *Historic Properties*.

Record of Environmental Consideration (RECs)

The Record of Environmental Consideration (REC) is an Army process for internal review of proposed projects in accordance with NEPA. The REC requires multiple disciplines to review projects to determine and comment on potential impacts.

The CRMP reviewed eleven (11) REC documents specifically concerning the Clarksville Base Historic District. RECs are labeled by federal fiscal years; therefore, fiscal years 2019-2020 will be listed. Most frequently, the proposed undertaking is reviewed internally, in accordance with the OCB PA. RECs usually cover projects which have no effect to historic properties or can be modified, through coordination with the CRMP, by the proponent to avoid effects to historic

properties. A map of all projects within Clarksville base for which RECs were completed in the reporting year is depicted in Figure 2.

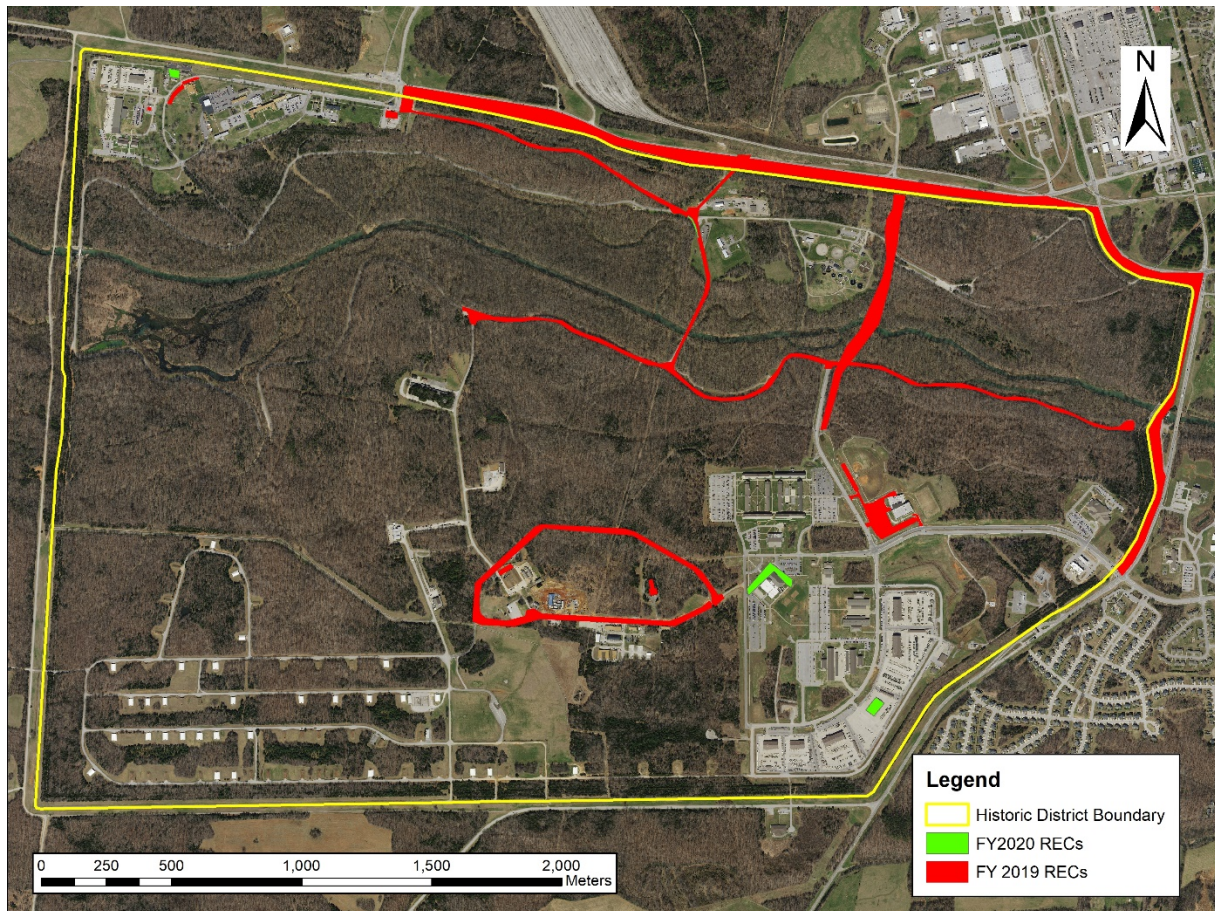


Figure 2. REC Project Areas

In accordance with Stipulation C.2, of the aforementioned agreement, for undertakings regarding properties related to the operation of the former Clarksville Base, standard procedures are followed to allow Fort Campbell to proceed with the project without formal consultation. Stipulation C.2 is listed below:

For undertakings that pose potential effects to the CBHD as a whole and to contributing elements of the district and located in the area illustrated in attachment B, the following standard treatments will be applied:

The Cultural Resources Management program and the Master Planning Branch shall jointly document the following for each project affecting Clarksville Base Historic District or its contributing elements. The documentation will be retained in project planning files:

a. alternatives considered and/or implemented for avoiding or minimizing adverse effects.

- b. a list of the contributing elements to be affected by the undertaking.*
- c. documentation of consideration of adaptive re-use of buildings or Structures that are contributing elements in accord with section 111 of the National Historic Preservation Act and E.O. 13287.*
- d. verify that the archival drawings as described in stipulation A.4. have already been completed for the buildings and structures that are contributing elements at issue. The project shall not proceed until this documentation is completed and distributed to the parties as specified in stipulation A.4.*
- e. take a detailed set of digital photographs of each contributing element adversely affected by the undertaking.*
- f. completion of the documentation in sections a-e will constitute evidence that Fort Campbell has complied with section 106 of the NHPA in regard to effects of its undertaking with respect to the Clarksville Base Historic District and this documentation may be cited as such for purposes of any other coordinated planning processes.*

A list of RECs reviewed by the CRMP, in CBHD, is included in table 1. Eleven (11) of the REC documents were reviewed by the CRMP in accordance with the programmatic agreement and were determined to have *No Adverse Effect to Historic Properties* by internal Fort Campbell CRMP staff. A total of two (2) of these RECs required additional documentation in accordance with stipulation C.2. and are highlighted in Table 1. The Compliance Documents for these projects are included in Attachments 1 and 2.

Table 1 RECs Reviewed in 2019

REC # 19-	Title*
47	OLD CLARKSVILLE BASE ROADS
95	Install Pre-cast Concrete Communications Hut
107	Demolish Relocatables - FY19
116	Gander Memorial Backup Tree Planting
128	19-128: Tree Trimming (Mabry Road to California Road)
141	Replace LMR Hut BLDG. 7549
154	Parking Lot Re-Striping
201	Renovate Bldg. 7882 (Bunker)

REC # 20-	Title
16	Install ADA Compliant Wooden Ramp. Replace Exterior Door w/ADA Compliant Door
34	Repair Maintenance Bay Doors
36	Install Exterior Lights

* Titles come directly from the REC document and are named by the proponent. The names are copied exactly to ensure consistency and may have typographical and/or spelling errors from the original document.

Individual Section 106 Consultation

Under Stipulations E.1 and E.2 of the CBHD programmatic agreement, when undertakings are not exclusively reviewed by Fort Campbell personnel, an individual Section 106 consultation, per 36 CFR 800, with the TN SHPO must be performed before the undertaking can proceed. When a Section 106 Consultation is completed, it is forwarded to the SHPO for concurrence with the Army effect determination. No Section 106 consultations were completed in 2019.

Ongoing Consultation: Adverse Effect to Facility 7739, 7740, and 7747, in the Clarksville Base Historic District

In 2018, a Section 106 Consultation was conducted with the TN SHPO regarding the renovation of facilities 7739, 7740, and 7747 within the National Register Eligible Historic District, Clarksville Base. Fort Campbell determined that required renovations would not comply with Secretary of the Interior's Standards for Rehabilitation and would constitute an *Adverse Effect to Historic Properties*. The Tennessee SHPO concurred with this determination in a letter dated March 27, 2018. Fort Campbell has developed, in coordination with the TN SHPO, and invited concurring parties, a DRAFT Memorandum of Agreement (MOA) to mitigate the Adverse Effect. Currently, Plans for the renovation are on hold while Major Commands within the Army shift priorities to align with changing National Security requirements. Fort Campbell anticipates a formal decision of the disposition of the renovations in 2020. Fort Campbell will continue consultation with the Tennessee SHPO and consulting parties once a way forward has been decided.

Formal Correspondence

The CRMP also developed formal correspondence packages with the TN SHPO regarding activities not covered through REC documents or Section 106 Consultations. Correspondence packages are summarized below.

Table 2. Legal agreements sent in 2019

Title	Result	Date of Signature
<i>2019 Amendment extending Programmatic Agreement for Operation, Maintenance, and Development at the Clarksville Base Historic District</i>	Signed	December 13, 2019

Tennessee One Call

The Tennessee One Call is an automated system to serve as a notification for any underground digging that will occur on the installation, in both Tennessee and Kentucky. This automated system notifies callers of any underground utilities buried within the project area. The CRMP receives automated Tennessee One Call tickets, via email, referencing geographical locations for review for potential impacts to Cultural Resources. Most Tennessee One Calls are placed for repair and/or maintenance to utility lines and television satellite installation. The CRMP reviewed 1,509 Tennessee One Calls in 2019, over the entire installation. A total of 61 Tennessee One Calls in 2019 were within the Clarksville Base Historic District. All Tennessee One Calls were determined to have *No Adverse Effect*.

Archaeological Investigations

One archaeological site evaluation project was completed within Clarksville Base in 2019. The project consisted of a Phase II archaeological evaluation of two (2) sites with fieldwork beginning in 2018 and continuing to 2019. The Final report required revisions and coordination with the Tennessee Division of Archaeology (TDOA) regarding site file discrepancies. Fort Campbell is continuing to work with the TDOA to resolve the issues and expects completion in 2020.

Conclusion

With the pending updates for the Programmatic Agreement and implementation of the ICRMP, the CRMP can foster consistent and appropriate methods for cultural resource management. The CRMP has begun coordinating with the TN SHPO on the new Programmatic Agreement. The Fort Campbell Cultural Resource Management Program hopes for continued improvement and efficiency in the management of cultural properties within the Clarksville Base Historic District.

REC 19-201: Renovate Bldg. 7882 (Bunker)

Ronald Grayson, M.A., RPA (15557)
Fort Campbell Cultural Resources Program Manager
22 June 2020

I. Introduction

The proposed undertaking will take place in the Clarksville Base Historic District (CBHD) Development Area. Facility 7882 is currently in use as a classroom facility for the Explosive Ordnance Disposal unit (EOD). Additional specialized classroom space is required to maintain readiness for EOD personnel. Facility 7882 is currently being used by EOD as a training/classroom facility but it no longer meets the mission and training requirements of the unit. Facility 7882 is a contributing resource of the CBHD within the development area. The planning and approval of Development within the historic district should follow procedures set out in the *Programmatic Agreement between Fort Campbell and the Tennessee State Historic Preservation Office Regarding Development, Construction and Operations at Clarksville Base Historic District* that went into effect on January 9th, 2009. The undertaking is within Montgomery County, Tennessee. Under stipulation C.2 of the aforementioned agreement, the CRMP may approve undertakings that pose potential effects to the CBHD and contributing elements when the standard treatments, outlined in stipulation C.2 are followed.

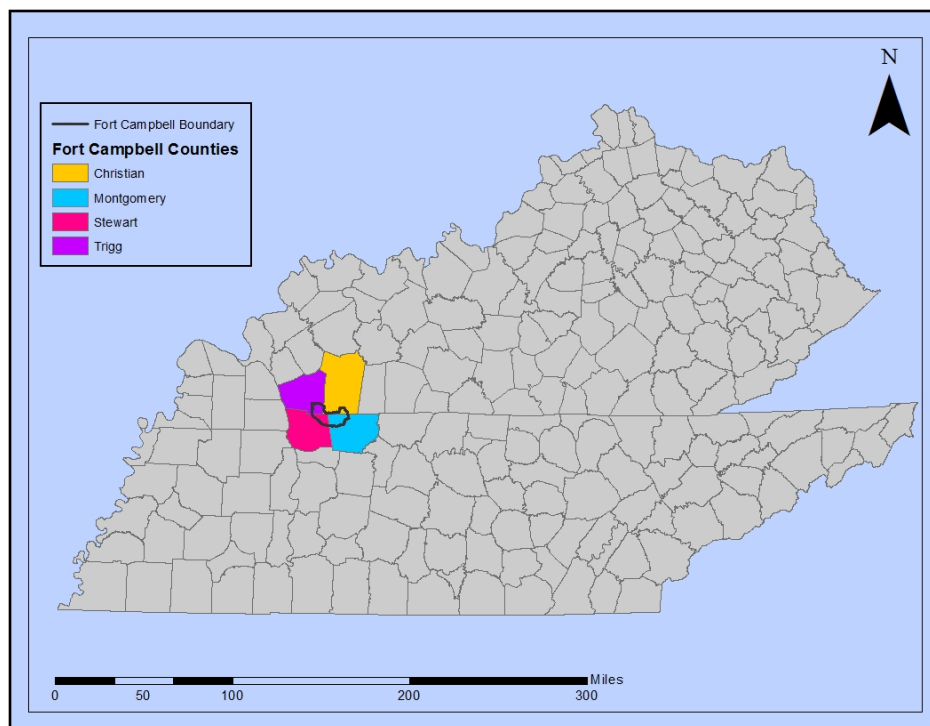


Figure 1: Location of Fort Campbell in Tennessee and Kentucky.

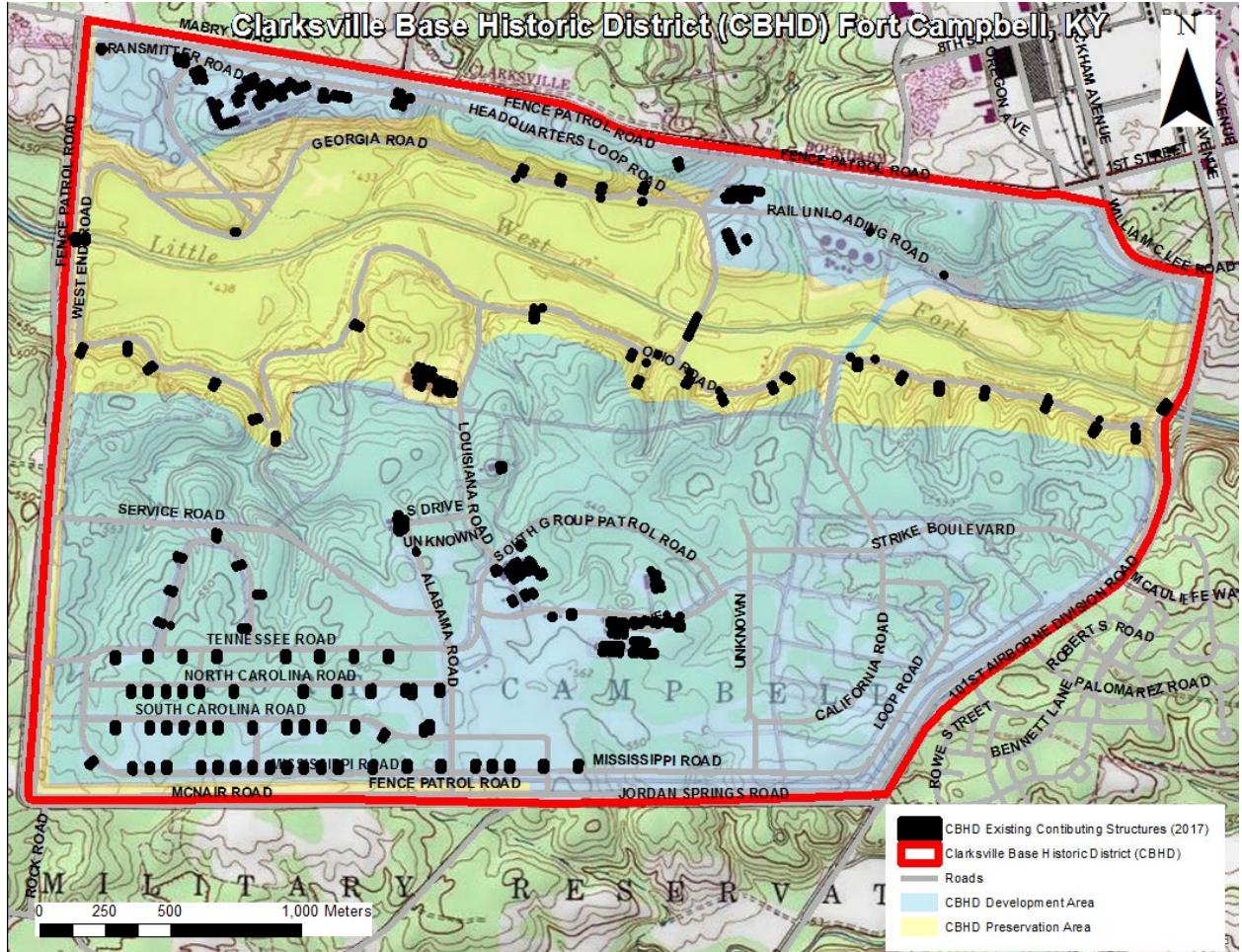


Figure 2: View of the CBHD Contributing Structures and Development and Preservation Areas.

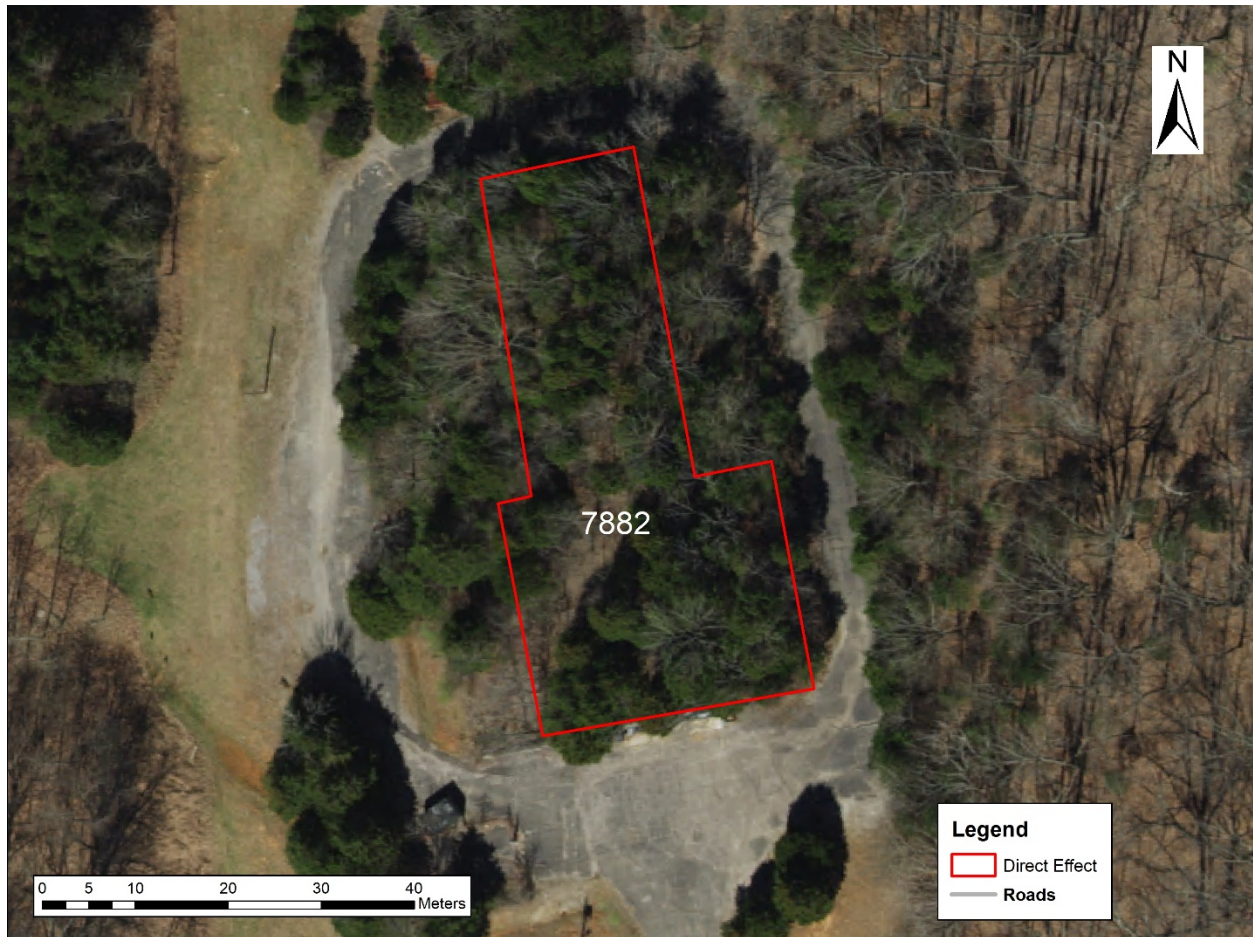


Figure 3: Building 7882 (Direct Effect).

II. The Undertaking

The proposed undertaking is documented in the project's Record of Environmental Consideration (REC). That document indicates that the project will:

1. Renovate existing classroom space to include new drop ceilings, mold/mildew mitigation, collaboration working rooms, and updated latrine facilities.

III. Areas of Potential Effects

The programmatic agreement sets out the requirements for specific undertakings within the Development Area of the CBHD in stipulation C.2.:

“For undertakings that pose potential effects to the CBHD as a whole and to contributing elements of the district and located in the area illustrated in attachment B, the following standard treatments will be applied: The Cultural Resource Management program and the Master Planning Branch shall jointly document the following for each project affecting Clarksville Base Historic District or its contributing elements. The documentation will be retained in project planning files”

Each requirement in Stipulation C.2. of the CBHD programmatic agreement is listed and Fort Campbell's actions to meet them are summarized below.

C.2.a. Alternative considered and/or implemented for avoiding or minimizing adverse effects.

1. Continued use of the facility as a classroom would not meet the mission and training needs of the EOD. If not renovated, the EOD would have to build or locate another suitable space necessitating the abandonment of the facility.

C.2.b. A list of the contributing elements to be affected by the undertaking.

1. Building 7882 is the only building that will be directly affected by this undertaking.
2. The renovation is entirely internal, there are no indirect visual effects.

C.2.c. Documentation of consideration of adaptive re-use of buildings or structures that are contributing elements in accord with section 111 of the National Historic Preservation Act and E.O. 13287.

For this undertaking, this provision does not apply since the contributing structure will remain in the current use which is already an adaptive reuse of the former storage bunker.

C.2.d. Verify that the archival drawings as described in stipulation A.4. have already been completed for the buildings and structures that are contributing elements at issue. The project shall not proceed until this documentation is completed and distributed to the parties as specified in stipulation A.4.

Archival drawings, floor plans and elevations, including notable building details have been reproduced on mylar by Brockington and Associates under contract to Fort Campbell and delivered to Fort Campbell as of August 11th, 2010 for all contributing structures directly and indirectly affected by this project. A complete set was delivered, as specified in the programmatic agreement, to:

Pratt Museum
Directorate of Public Works
Fort Campbell Cultural Resources Program
Tennessee Historical Commission

C.2.e. Take a detailed set of digital photographs of each contributing element adversely affected by the undertaking.

Digital photos, with digital file formats meeting the proposed standards set out by the National Register of Historic Places have been taken for all contributing structures directly affected by this project. Prints from these digital files have been

made on archival quality photo paper with the recommended stable inks, also in accord with the standards proposed by the National Register of Historic Places. Copies of both the digital files and the prints were distributed to the same repositories as the mylar drawings.

C.2.f. completion of the documentation in sections a-e will constitute evidence that Fort Campbell has complied with section 106 of the NHPA in regard to effects of its undertaking with respect to the Clarksville Base Historic District and this documentation may be cited as such for purposes of any other coordinated planning processes.

REC 20-016: Install ADA Compliant Wooden Ramp. Replace Exterior Door w/ADA Compliant Door

Ronald Grayson, M.A., RPA (15557)
Fort Campbell Cultural Resources Program Manager
22 June 2020

I. Introduction

The proposed undertaking will take place in the Clarksville Base Historic District (CBHD) Development Area. Facility 7541 is currently in use by the Network Enterprise Command and is out of compliance with the Americans with Disabilities Act (ADA) requiring ramp access and larger doors. Facility 7541 is a contributing resource of the CBHD within the development area. The planning and approval of Development within the historic district should follow procedures set out in the *Programmatic Agreement between Fort Campbell and the Tennessee State Historic Preservation Office Regarding Development, Construction and Operations at Clarksville Base Historic District* that went into effect on January 9th, 2009. The undertaking is within Montgomery County, Tennessee. Under stipulation C.2 of the aforementioned agreement, the CRMP may approve undertakings that pose potential effects to the CBHD and contributing elements when the standard treatments, outlined in stipulation C.2 are followed.

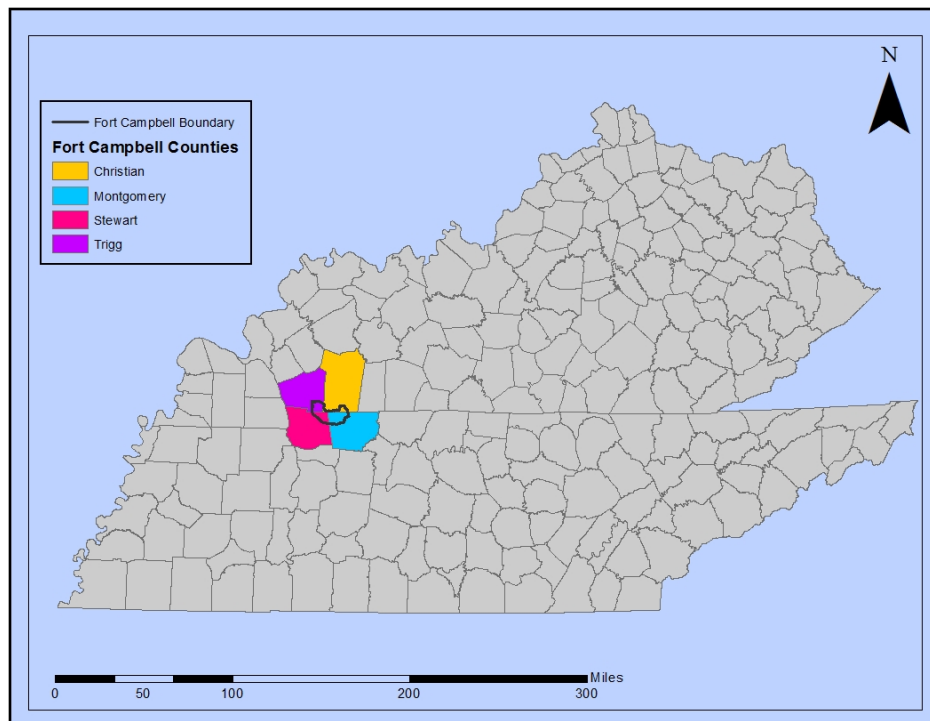


Figure 1: Location of Fort Campbell in Tennessee and Kentucky.

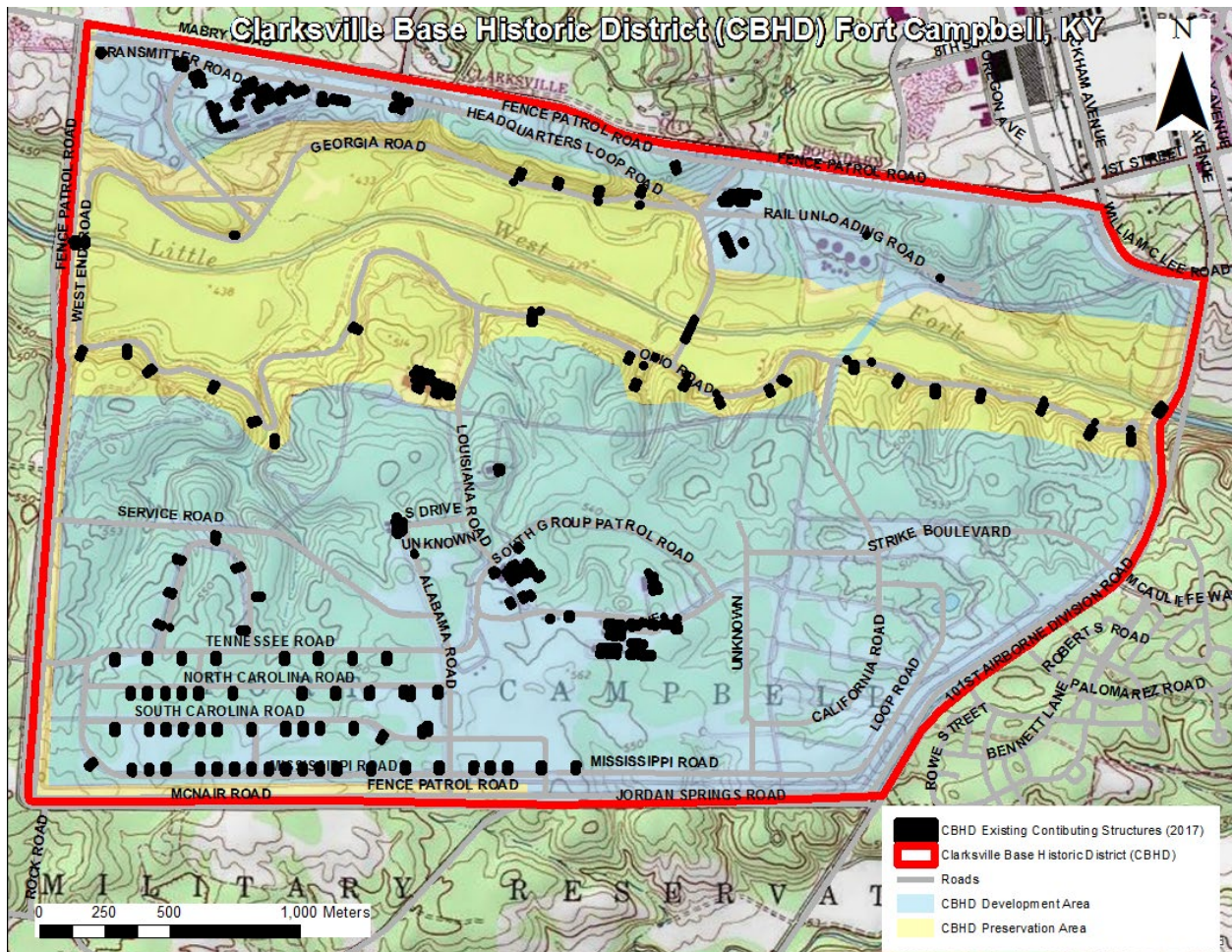


Figure 2: View of the CBHD Contributing Structures and Development and Preservation Areas.

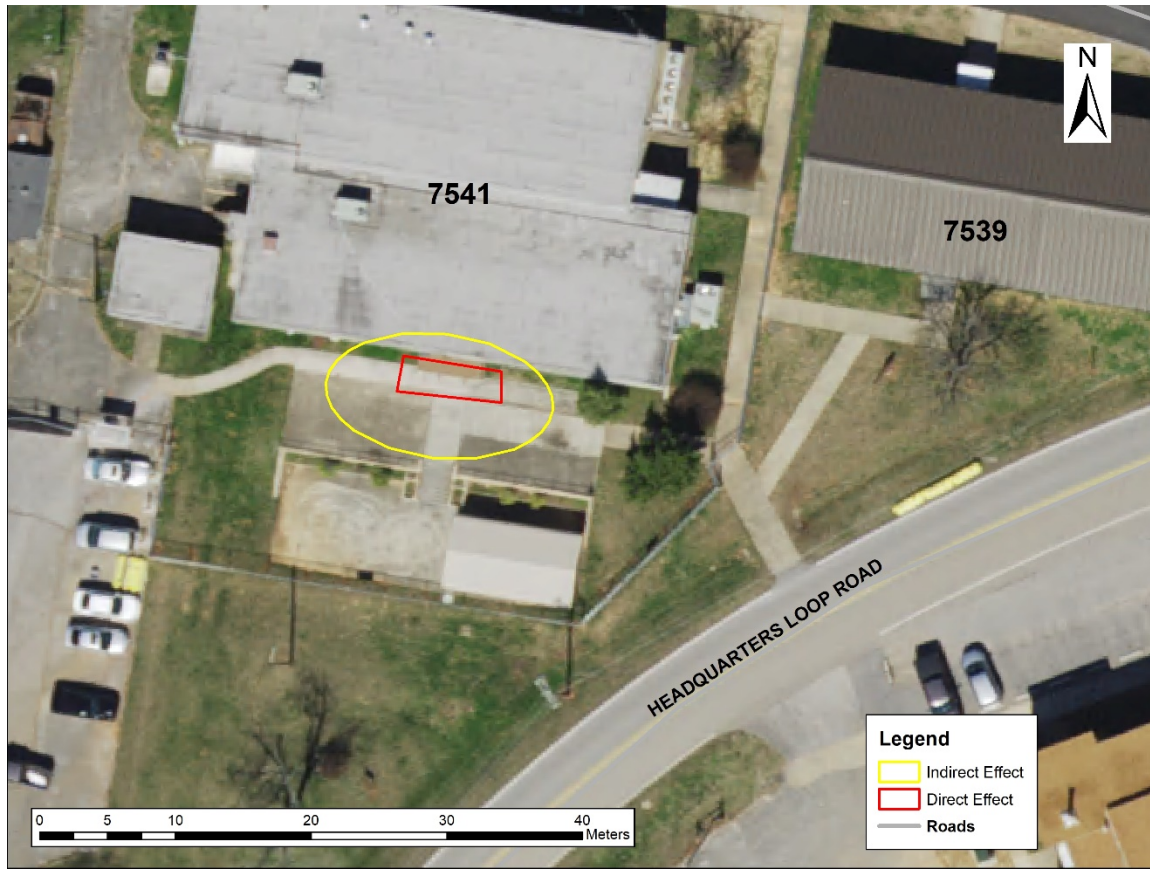


Figure 3: Building 7541 (Direct Effect) and 7539 built in 2011.

II. The Undertaking

The proposed undertaking is documented in the project's Record of Environmental Consideration (REC). That document indicates that the project will:

1. Install 18 Gauge ramp with ADA compliant threshold interactive double doors and frame. Install existing lock hardware.

III. Areas of Potential Effects

The programmatic agreement sets out the requirements for specific undertakings within the Development Area of the CBHD in stipulation C.2.:

“For undertakings that pose potential effects to the CBHD as a whole and to contributing elements of the district and located in the area illustrated in attachment B, the following standard treatments will be applied: The Cultural Resource Management program and the Master Planning Branch shall jointly document the following for each project affecting Clarksville Base Historic District or its contributing elements. The documentation will be retained in project planning files”

Each requirement in Stipulation C.2. of the CBHD programmatic agreement is listed and Fort Campbell's actions to meet them are summarized below.

C.2.a. Alternative considered and/or implemented for avoiding or minimizing adverse effects.

1. Due to the ADA nature of the construction, the only alternative was to cease using the facility and demolish it. This would have a greater impact to the CBHD as a whole and was not required due to the minimal amount of work to meet the ADA requirements for access.

C.2.b. A list of the contributing elements to be affected by the undertaking.

1. Building 7541 is the only building that will be directly affected by this undertaking.
2. There are no indirect visual effects to any contributing resources in CBHD. Other buildings visually impacted by the project are not yet 50 years old, not a contributing element to the CBHD, and are not individually eligible for listing in the NRHP.

C.2.c. Documentation of consideration of adaptive re-use of buildings or structures that are contributing elements in accord with section 111 of the National Historic Preservation Act and E.O. 13287.

For this undertaking, this provision does not apply since the contributing structure will remain in the current use which is already an adaptive reuse of the former storage bunker.

C.2.d. Verify that the archival drawings as described in stipulation A.4. have already been completed for the buildings and structures that are contributing elements at issue. The project shall not proceed until this documentation is completed and distributed to the parties as specified in stipulation A.4.

Archival drawings, floor plans and elevations, including notable building details have been reproduced on mylar by Brockington and Associates under contract to Fort Campbell and delivered to Fort Campbell as of August 11th, 2010 for all contributing structures directly and indirectly affected by this project. A complete set was delivered, as specified in the programmatic agreement, to:

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Directorate of Public Works
Fort Campbell Cultural Resources Program
Tennessee Historical Commission

C.2.e. Take a detailed set of digital photographs of each contributing element adversely affected by the undertaking.

Digital photos, with digital file formats meeting the proposed standards set out by the National Register of Historic Places have been taken for all contributing structures directly affected by this project. Prints from these digital files have been made on archival quality photo paper with the recommended stable inks, also in accord with the standards proposed by the National Register of Historic Places. Copies of both the digital files and the prints were distributed to the same repositories as the mylar drawings.

C.2.f. completion of the documentation in sections a-e will constitute evidence that Fort Campbell has complied with section 106 of the NHPA in regard to effects of its undertaking with respect to the Clarksville Base Historic District and this documentation may be cited as such for purposes of any other coordinated planning processes.



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

August 1, 2020

Office of the Garrison Commander

Mr. E. Patrick McIntyre, Jr., Executive Director
Tennessee Historical Commission
2941 Lebanon Road
Nashville, Tennessee 37243-0442

Dear Mr. McIntyre:

In accordance with Stipulation (H) of *Programmatic Agreement Between Fort Campbell and the Tennessee State Historic Preservation Office Regarding Development, Construction and Operations at Clarksville Base Historic District* (Amended December 2019), Fort Campbell is forwarding an annual report to your office of all projects and activities reviewed by the Cultural Resource Management Program in the Clarksville Base Historic District. This report must be submitted to the Advisory Council on Historic Preservation, Installation Management Command-Readiness and the Tennessee State Historic Preservation Office. This report will include a list of Army projects and activities that have been reviewed, by the Fort Campbell Cultural Resources Office, for possible effects to historic properties, a determination of those effects, a summary of mitigation and/or treatment measures, and a summary of consultation activities performed by the Cultural Resource Management Program for calendar year 2019 at Clarksville Base Historic District.

It is the determination of the US Army that this report meets the requirements of Stipulation (H) of the aforementioned agreement for calendar year 2019. Please accept the enclosed annual report as meeting compliance with Stipulation (H) of the aforementioned agreement.

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

Enclosures



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

August 1, 2020

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:

In accordance with Stipulation (H) of *Programmatic Agreement Between Fort Campbell and the Tennessee State Historic Preservation Office Regarding Development, Construction and Operations at Clarksville Base Historic District* (Amended December 2019), Fort Campbell is forwarding an annual report to your office of all projects and activities reviewed by the Cultural Resource Management Program in the Clarksville Base Historic District. This report must be submitted to the Advisory Council on Historic Preservation, Installation Management Command-Readiness and the Tennessee State Historic Preservation Office. This report will include a list of Army projects and activities that have been reviewed, by the Fort Campbell Cultural Resources Office, for possible effects to historic properties, a determination of those effects, a summary of mitigation and/or treatment measures, and a summary of consultation activities performed by the Cultural Resource Management Program for calendar year 2019 at Clarksville Base Historic District.

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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

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