

The following presents the Fiscal Year (FY) 2019 Annual Reports for the:

- 1) *Programmatic Agreement among the U.S. Army Garrison Fort Carson, the Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Construction, Maintenance, and Operations Activities for Areas on Fort Carson, Colorado, as amended (53 pages)*
- 2) *Programmatic Agreement among U.S. Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Military Training and Operational Support Activities Down Range Fort Carson, Colorado, as amended (36 pages)*
- 3) *Programmatic Agreement among U.S. Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado, as amended (76 pages)*

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FISCAL YEAR (FY) 2019 ANNUAL REPORT:
***PROGRAMMATIC AGREEMENT AMONG THE U.S. ARMY GARRISON FORT CARSON, THE STATE
HISTORIC PRESERVATION OFFICER, AND THE ADVISORY COUNCIL ON HISTORIC
PRESERVATION REGARDING CONSTRUCTION, MAINTENANCE, AND OPERATIONS ACTIVITIES
FOR AREAS ON FORT CARSON, COLORADO***

NOVEMBER 15, 2019

The U.S. Army Garrison (USAG) Fort Carson submits the following annual report to the State Historic Preservation Officer (SHPO) and concurring parties in accordance with Stipulation VII of the *Programmatic Agreement among the U.S. Army Garrison Fort Carson, the Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Construction, Maintenance, and Operations Activities for Areas on Fort Carson, Colorado*, hereafter referred to as the Fort Carson Built Environment PA. This report covers the period from October 1, 2018, through September 30, 2019, and is formatted in accordance with Appendix D. It has been distributed electronically to the SHPO and concurring parties and is available online at: <http://www.carson.army.mil/organizations/dpw.html#three>.

I. Exempted Undertakings

Table 1 of Enclosure 1 lists all exempted undertakings that have been reviewed by the Fort Carson Cultural Resources Management Program (CRMP) between October 1, 2018, and September 30, 2019. Two hundred twenty-two undertakings were reviewed that were considered exempted in accordance with Appendix C of the Fort Carson Built Environment PA.

II. Non-Exempted Undertakings

Table 2 of Enclosure 1 lists all undertakings within the areas of potentials effects (APEs) covered by the Fort Carson Built Environment PA that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA). Sixteen undertakings required Section 106 consultation. Section 106 consultation has been completed for nine undertakings (2019-004, 2019-030/031/115, 2019-038/367, 2019-136/233/273/355, 2019-152, 2019-168, 2019-208, 2019-243, and 2019-286. Consultation is ongoing for three undertakings (2019-259, 2019-321, and 2019-379). Consultation has not been initiated for three undertakings (2019-141, 2019-369, and 2019-371); and one undertaking (2019-269) was cancelled prior to the initiation of Section 106 consultation.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRMP. These 13 undertakings include document reviews, undertakings with no potential to effect historic properties, and other undertakings.

III. Actions Update

A. Cultural Resources Awareness Training

The following cultural resources awareness training materials are provided to Soldiers, civilian employees, contractors, and other users, as appropriate:

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated August 2017
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; available online at: <http://www.carson.army.mil/organizations/dpw.html> (click on the link titled “DPW Programs and Services” on the left side of the page, then scroll up half a screen)
- Cultural Resources Awareness Video – available online at: <http://www.carson.army.mil/organizations/dpw.html#three>

Additional training materials, briefs, and presentations are provided on an as-needed basis, and are typically specific to the situation.

In correspondence dated November 29, 2018 (HC #58731, HC #63877, and HC #65747), the SHPO requested USAG Fort Carson to assess how the cultural resources awareness training materials directly affect the number of inadvertent entries into protected resources. The SHPO further states the current training program does not appear to be effective in decreasing the number of sites impacted by brigade training exercises based on the increased number of entries noted during after action inspections. Their correspondence is included in Enclosure 2. USAG Fort Carson has assessed its cultural resources awareness training program, and is currently drafting a response to address the SHPO’s concerns. This response will be sent to the SHPO by late December 2019.

B. Inventory and Survey of the APEs

On June 28, 2019, a pedestrian survey of approximately 10.1 acres within Training Area 4 was conducted by the Fort Carson Cultural Resources Manager and archaeologists from Sol Solutions. Transect intervals were spaced no greater than 20 meters apart. Particular attention was given to any area with high ground visibility, and the cut bank of the drainage was also inspected for cultural materials. No new cultural resources were identified. Site 5EP135, a historic military training site dating to the 1950s to 1970s, is located within the northwestern corner of the survey.

C. Exempted Undertakings

See Table 1 of Enclosure 1. As of September 30, 2019, 222 undertakings were reviewed that are considered to be exempted undertakings in accordance with Appendix C of the Fort Carson Built Environment PA.

D. Expanding the APEs for Exempted Undertakings

The APEs have not been expanded during the reporting period.

E. Inadvertent Discoveries

There were no inadvertent discoveries during the reporting period.

F. Emergency Response per 36 CFR 800.12

Per 36 CFR 800.12(d), fire suppression activities associated with the following wildland fire events are considered immediate rescue and salvage operations conducted to preserve life or property, and as such, are exempted from the provisions of Section 106.

- Incident #2018-3369: The wildland fire started on October 20, 2018, with fire suppression activities concluding the same day. Approximately two acres were impacted near the address 11 St. Lo Drive. There are no historic properties within the wildland fire footprint.
- Incident #2018-3896: The wildland fire started on December 11, 2018, with fire suppression activities concluding the same day. Approximately one acre was impacted along Nelson Boulevard within the Main Post. There are no historic properties within the wildland fire footprint.
- Incident #2019-1302: The wildland fire started on May 30, 2019, with fire suppression activities concluding the same day. Approximately 0.1 acres near 9700 Essayons Road were impacted. There are no historic properties within the wildland fire footprint.
- Incident #2019-2048: The wildland fire started on August 14, 2019, with fire suppression activities concluding the same day. Approximately one acre near Range 57 was impacted. There are no historic properties within the wildland fire footprint.
- Incident #2019-2140: The wildland fire started on August 24, 2019, with fire suppression activities concluding the same day. Approximately 0.1 acres in Range 60A were impacted. There are no historic properties within the wildland fire footprint.
- Incident #2019-2286: The wildland fire started on September 11, 2019, with fire suppression activities concluding on the same day. Approximately 0.01 acres near 5928 Ware Street were impacted. There are no historic properties within the wildland fire footprint.

G. Amendment

A Second Amendment to the Fort Carson Built Environment PA is being proposed to extend the duration of the PA until December 31, 2020. This will provide time to finish consultation on a new PA.

H. Dispute Resolution

There have been no dispute resolution activities during the reporting period.

Report compiled by:

Jennifer R. Kolise
Cultural Resources Manager

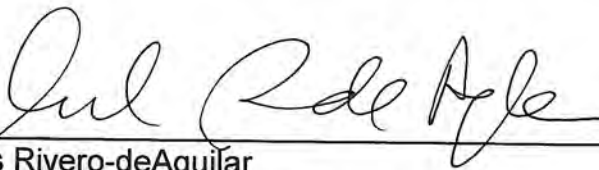
Approved by:



Wayne Thomas
Chief, NEPA and Cultural Management Branch

12 Nov 2019

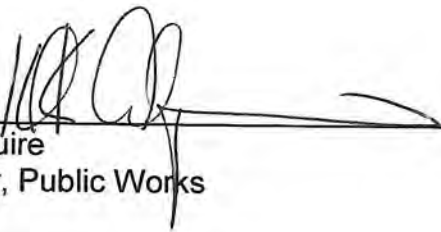
Date



Carlos Rivero-deAguilar
Chief, Environmental Division

14 Nov 2019

Date



Hal Alguire
Director, Public Works

14 Nov 2019

Date

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ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY18 REPORTING PERIOD (OCTOBER 1, 2018, THROUGH SEPTEMBER 30, 2019) UNDER THE FORT CARSON BUILT ENVIRONMENT PA

Table 1. Exempted Undertakings

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-001 Install New Monitoring Well, Stormwater Management Unit (SWMU) 168 (Project Cancelled)	DPW18-142	Main Post	BE I.A1	10/1/2018	Project was cancelled.
2019-002 Replace Drinking Water Fountain, Bldg 8100	TEN18-048	Main Post	BE I.A2	10/1/2018	
2019-004 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/1/2018	<p>2019-004 is an updated NEPA review of the FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS, as it has been over six months since last reviewed and portions of the project had not been initiated.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in March 2018 for mechanical fuel reduction within the White Horse Saloon APE (see Table 2 below).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, 2017-174, 2018-001, 2018-004, 2018-119, & 2018-205.</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-005 & 2019-099 13th ASOS Expansion, New Construction - Air Support Operations Center (ASOC)	ACC123301 PN 123301	Main Post	BE I.A1	10/2/2018 12/20/2018	2019-005 is the 60% design review; 2019-099 is the 100% design review. Undertaking has been previously reviewed under NEPA project numbers 2015-385, 2016-296, & 2017-286.
2019-006 & 2019-151 Cap/Fill Motor Pool Pits, Bldgs 1692 & 3092	DPW18-125	Main Post	BE I.A2	10/2/2018 2/11/2019	2019-006 is the initial review of the project; 2019-151 is a review of the updated project scope in which Bldg 3092 was added to the project.
2019-007 Install Non-Secure Internet Protocol Router (NIPR) and Secure Internet Protocol Router (SIPR) Lines, Bldg 7416	SFG19-001	Main Post	BE I.A2	10/2/2018	
2019-008 Install Sign Poles, Bldg 7503	MED19-001	Main Post	BE I.A1	10/2/2018	
2019-009 Construct Right-Turn Lanes on Titus Blvd and Specker Ave	DPW19-011	Main Post	BE I.A1 BE I.A2	10/2/2018	Construct a westbound right-turn lane along Titus Blvd to Specker Ave. Construct a southbound right-turn lane along Specker Ave to Titus Blvd. Adjust or relocate traffic signal system as necessary for new roadway geometry. Adjust or relocate all pedestrian facilities to maintain existing pedestrian routes.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-010 Vegetation Removal along Firebreaks, TAs 4, 16, & 41, Fort Carson	DPW19-008	Main Post Downrange Fort Carson	BE I.B3 FC D2b	10/2/2018	Mastication of vegetation less than 8 inches at breast height. Larger undesirable trees will be felled, limbed and bucked on site and used for firewood program. The trees will be thinned where the juniper, pinyon and ponderosa pine tree density is too great.
2019-012 Repair Parking Lot, Bldg 8932	DPW19-018	Main Post	BE I.A2	10/3/2018	Full depth repair. Restripe lot. Replace signage to bring into compliance with Ft Carson Installation Design Guidelines and Americans with Disabilities Act requirements. Replace damaged, gutter and sidewalk sections.
2019-013 Complete Stormwater Repairs along Butts Rd between Wilderness Rd and the Ammunition Control Point	DPW19-020	Main Post	BE I.A2 BE I.B2	10/3/2018	
2019-017 Replace Water Fountain, Bldg 8152	TEN18-040	Main Post	BE I.A2	10/9/2018	
2019-018 Repair Landfill 8 Road, TA Bravo	DPW17-113	Main Post	BE I.A1 BE I.B2	10/11/2018	<p>2019-018 is an updated review of the project, as it has been over six months since last reviewed and project has not been initiated.</p> <p>Install rip rap armoring and culverts to safely direct water to closest drainage without damaging road. Import coarse fill to regrade eroded portions of road.</p> <p>Undertaking has been previously reviewed under NEPA project number 2018-160.</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-019 Repair Mini-Mall and North Bowling Alley Parking Lots, Bldg 1510	DPW19-007	Main Post	BE I.A2	10/15/2018	Mill and overlay asphalt with full depth repair where required. Restripe lot. Replace signage to bring into compliance with Ft Carson Installation Design Guide and Americans with Disabilities Act requirements.
2019-020 Install Americans with Disabilities Act (ADA) - Accessible Doorways, Bldg 1524	MWR15-050	Main Post	BE I.A2	10/15/2018	
2019-021 Install Security Fence, Bldg 7464	SFG18-023	Main Post	BE I.A1	10/15/2018	Install 1165 feet of 8-foot-high chain link fence around the building to include two 4.5-foot wide by 8-foot high personnel gates and one 25-foot wide by 8-foot high vehicle gate.
2019-022 Repair Parking Lots, Bldgs 1525 & 1526	DPW19-016	Main Post	BE I.A2	10/15/2018	Mill and overlay asphalt with full depth repair where required. Restripe lot. Replace signage to bring into compliance with Ft Carson Installation Design Guidelines and Americans with Disabilities Act requirements. Replace damaged curb, gutter and sidewalk sections.
2019-023 Repair Golf Course Parking Lot, Bldg 7800	DPW19-017	Main Post	BE I.A2	10/15/2018	Mill and overlay asphalt with full depth repair where required. Restripe lot. Replace signage to bring into compliance with Ft Carson Installation Design Guidelines and Americans with Disabilities Act requirements. Replace damaged curb, gutter and sidewalk sections.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-024 Repair / Seal Cracks in Asphalt Post-Wide	DPW17-015	Main Post	BE I.A2	10/15/2018	Preserve asphalt life to delay the need for major repairs. This is done by preventing water infiltration/erosion of base course.
2019-025 & 2019-244 Construction, Operation, and Maintenance of a National Intrepid Center of Excellence Satellite (NICoE)	PN 86943	Main Post	BE I.A1	10/16/2018 5/8/2019	2019-025 is the 60% and 100% design reviews. 2019-255 is the final Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. Undertaking has been previously reviewed under NEPA project numbers 2014-602 & 2015-114.
2019-026 & 2019-103 Repair / Replace Timber Bridges, Post-Wide	DPW19-019	Main Post	BE I.A1 BE I.A2 BE I.A3	10/16/2018 1/7/2019	2019-026 is the original undertaking review. 2019-103 is an updated NEPA review due to change in project scope. Bridge # T85125: Replace degraded timber members. Correct load posting sign. Bridge # FT007: Remove / replace with prefabricated steel pedestrian bridge. Construct sidewalk from west approach to corner of parking lot. Bridge # FT020, FT022, & FT023: Repair / replace damaged bridge components.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-027 & 2019-349 Construction of a Special Operations Forces (SOF) Mountaineering Facility	PN 81899	Main Post	BE I.A1	10/16/2018 8/27/2019	2019-027 is the review of the final Request for Proposal and Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. 2019-349 is the 60% design review. Undertaking has been previously reviewed under NEPA project numbers 2014-504, 2015-217, & 2018-292.
2019-028 Synchronize Traffic System & Install Traffic Signals	DPW17-001	Main Post	BE I.A1 BE I.A2	10/17/2018	2019-028 is an updated NEPA review of the project, as it has been over six months since last review and project has not been initiated. Software upgrades are required to synchronize traffic signals. Traffic signal poles will be installed at the intersection of Titus and Utah Beach. Undertaking has been previously reviewed under NEPA project number 2016-496.
2019-029 Install Fence, Bldg 1860	DPW18-058	Main Post	BE I.A1	10/17/2018	2019-029 is an updated NEPA review of the project, as it has been over six months since last review and the project has not been initiated. Undertaking has been previously reviewed under NEPA project number 2018-141.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-030, 2019-031, & 2019-115 Installation of Security Measures at Multiple Locations, Fort Carson	DPW18-060 DPW18-061 DPW18-062	Main Post Turkey Creek Complex Downrange Fort Carson	BE I.A1 FC D1a	10/17/2018 1/10/2019	<p>2019-030 is the review for the installation of security measures at Strobel Well and Gate 1 Water Main Ground Vault. 2019-031 is the review for the installation of ladder access guards on various water tanks. 2019-115 is an updated NEPA review of the project.</p> <p>Section 106 consultation for the installation of security measures at Strobel Well and associated water storage tank in Turkey Creek Complex was completed on 9 January 2019 (see Table 2).</p> <p>Security measures to be installed (as needed) include security lighting, intrusion detection systems, security fences, and ladder access guards at the following locations: Wilderness Road Water Tower, Strobel Well and associated water storage tank, Camp Red Devil Water Storage Tank, West Water Storage Tank Facilities, and Gate 1 Water Main Vault.</p>
2019-032 Renovate Space for Photo Studio, Bldg 1230	DPT19-001	Main Post	BE I.A2	10/17/2018	
2019-033 Upgrade Network System at Garrison Commander's and Command Sergeant Major's Residences, Quarters 62 & 70	GAR19-003	Main Post	BE I.A1 BE I.A2	10/18/2018	Project requires the installation of new cable lines and new network devices.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-034 & 2019-348 Construction and Operation of a Special Operation Forces (SOF) Human Performance Training Center	PN 79447 SFG15-017	Main Post	BE I.A1 BE I.A2 BE I.A3	11/6/2018 8/26/2019	2019-034 is the review of the final Request for Proposal and Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. 2019-348 is the 60% design review. Undertaking has been previously reviewed under NEPA project numbers 2015-325, 2015-417, 2016-279, 2016-443, & 2018-300.
2019-036 & 2019-280 Install Additional Lighting and Safety Signals & Update Traffic Signage at Gate 4 Tank Trail Crossing	DPW19-013	Main Post	BE I.A1 BE I.A2	10/19/2018 6/19/2019	
2019-039 Construction of a Space and Missile Defense Capabilities (SMDC) Future Warfare Center	MCA10-001 PN 80809	Main Post	BE I.A1	11/5/2018	2019-039 is the review of the site proposed for the consolidated Future Warfare Center in support of the Army Space and Missile Defense Command (SMDC) in TA Bravo. This project may be related to an undertaking reviewed under NEPA project number 2018-055 (Construction of a SMDC Institute of Excellence).
2019-040 Replace Multiple Physical Training Climbing Ropes, Fort Carson	DPW18-140	Main Post	BE I.A2	10/25/2018	
2019-041 Convert Existing Taco John's restaurant to Boston Market, Bldg 6110	CIV18-008	Main Post	BE I.A2	10/26/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-042 Renovate Interspace, Bldg 1659	GAR18-018	Main Post	BE I.A2	10/29/2018	The project includes removing walls and adding tile flooring to change the function of the area into a meeting space/auditorium.
2019-043 Repair Damage to Vinyl Siding from Hail, Bldg 500	DPW19-028	Main Post	BE I.A2	10/30/2018	
2019-044 Repair Handheld Detector Lanes, TA Bravo	4ID17-002 4ID19-002	Main Post	BE I.A2	10/30/2018	2019-044 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-037.
2019-045 & 2019-198 Install Alarms on Emergency Exits, Bldg 1449	4ID19-001	Main Post	BE I.A2	10/31/2018 3/29/2019	2019-045 is the initial review of the project. 2019-198 is the updated NEPA review, as it has been over six months since last review and project has not been initiated.
2019-046 Install Erosion Control Measures along Motor Pool Fence, Bldg 7416	SFG19-003	Main Post	BE I.B2	11/1/2018	Remove current sediment buildup along motor pool fence (Bldg 7416). Then install geo-textile fabric and rip rap for erosion mitigation.
2019-047 Install Office Partitions, Bldg 7473	SFG19-002	Main Post	BE I.A2	11/1/2018	
2019-048 Replace Data Cabling, Bldg 7462	RES19-001	Main Post	BE I.A2	11/1/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-049 Repair Loading Dock, Bldg 7500	MED18-006	Main Post	BE I.A2	11/5/2018	2019-049 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA project number 2018-143.
2019-050 Repair Drainage near Bldg 7494	MED18-018	Main Post	BE I.A2 BE I.B2	11/5/2018	
2019-051 Install Office Cubicles in Mezzanine, Bldg 1280	TEN19-029	Main Post	BE I.A2	11/6/2018	
2019-052 Paint Dog Kennel Walls and Floors, Bldgs 8997 & 8999	TEN19-004	Main Post	BE I.A2	11/8/2018	
2019-054 & 2019-340 Construction of Two Tactical Equipment Maintenance Facilities (TEMFs) - North TEMF and South TEMF - near Butts Army Airfield (BAAF)	PN 77301	Main Post	BE I.A1 BE I.A3	11/14/2018 8/21/2019	2019-054 is the review of the final Request for Proposal and the Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. 2019-340 is an updated NEPA review, as it has been over six months since last review and project has been initiated. Undertaking has been previously reviewed under NEPA project numbers 2018-150 and 2018-290.
2019-055 Roof Replacement, Bldgs 2258, 2461, 2700, & 7300	DPW19-029	Main Post	BE I.A2	11/14/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-056 Roof Replacement, Bldgs 1130, 1532, 2429, 2457, 2558, 2758, & 9072	DPW19-030	Main Post	BE I.A2	11/14/2018	
2019-057 Roof Replacement, Bldgs 1446, 1829, & 3600	DPW19-031	Main Post	BE I.A2	11/14/2018	
2019-058 Demolish and Replace Rail Load Ramp 19, Fort Carson	DPW19-032	Main Post	BE I.A1 BE I.A3	11/14/2018	
2019-059 Install Automotive Lift and 220-volt Power / 30-amp Circuit Breaker, Bldg 2082	SPC19-004	Main Post	BE I.A2	11/15/2018	
2019-060 299th Brigade Engineer Battalion Excavation Training Request, Range 60A, Fort Carson	n/a	Main Post	BE I.C3	11/16/2018	
2019-061 Renovate Bldg 7462	RES19-002	Main Post	BE I.A2	11/16/2018	Project will include the removal of existing vinyl baseboard, scraping and repair of damaged wall areas, and painting all wall surfaces with exception to bathroom.
2019-062 & 2019-165 Repair Drainage near Bldg. 7440	SFG17-013	Main Post	BE I.A1 BE I.A2 BE I.A3	11/16/2018 2/14/2019	2019-062 is an updated NEPA review of the project, as it has been over six months since last review and project has not been initiated. 2019-165 is the 90% design review. Undertaking has been previously reviewed under NEPA project number 2018-225.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-063 & 2019-165 Foundation Settlement Repair at Bldg 7431 (Indoor Baffle Range)	SFG18-010	Main Post	BE I.A2	11/16/2018 2/14/2019	2019-063 is an updated NEPA review of the project, as it has been over six months since last review and project has not been initiated. 2019-165 is the 90% design review. Undertaking has been previously reviewed under NEPA project number 2018-223.
2019-064 & 2019-159 Renovate Waller Gym, Bldg 2357	MWR18-021	Main Post	BE I.A2	11/16/2018	The work includes removing the rubber and wood flooring, leveling the concrete subfloor, installing new rubber flooring and turf, and painting the interior walls. 2019-156 is a change in the project scope.
2019-065 Repair Storm-Damaged Lighting, Fort Carson	DPW18-117	Main Post	BE I.A2	11/20/2018	
2019-066 Enclose Outdoor Exhibit Area, Bldg 6013	GAR19-005	Main Post	BE I.A2	11/26/2018	The project will enclose the outdoor exhibit area in the breezeway, and includes the addition of two outer walls, three electrical sockets, heating, ventilation, and air conditioning (HVAC) plumbing, overhead lighting, and a vestibule doorway.
2019-067 Construct Warrior Recovery Center (WRC) Troop Medical Facility	MCA19-002 PN 80411	Main Post	BE I.A1	11/26/2018	
2019-068 Repair Storm Drain Inlets, Bldgs 1042, 1219, 1220, 1659, & Specker Ave	DPW15-045	Main Post	BE I.A2 BE I.B2	11/27/2018	Replace existing storm inlets with higher capacity/clog-free inlets.

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2019-069 Install Drainage, Signal Hill and Wetzel Ave.	DPW18-010	Main Post	BE I.A1 BE I.A2 BE I.B2	11/27/2018	Regrade and resurface Signal Hill Rd. Install drainage feature (e.g. round steel tube cattle guard) on Signal Hill Rd before Wetzel Ave.
2019-070 Construct Sanitary Sewer Main, Wilderness Rd and Gate 6	DPW18-050	Main Post	BE I.A1	11/28/2018	Construct a sanitary sewer main and service laterals to Wilderness Rd Tent City shower facilities and Gate 6 Access Control Point.
2019-071 Convert Gas Dryers to Electric, Bldg 1000	DPW18-077	Main Post	BE I.A2	11/29/2018	
2019-072 Convert Gas Dryers to Electric, Bldg 7506	DPW18-078	Main Post	BE I.A2	11/29/2018	
2019-074 Install Street Lights at Select Pedestrian Crosswalks	DPW19-012	Main Post	BE I.A1	11/30/2018	Install light-emitting diodes (LED) streetlights , with necessary underground electrical service improvements at the following street crossing locations: Harr Ave at Okinawa Dr; Chiles Ave at Abrams Elementary School; Mekong St near Bldg 6270; Specker Ave at Khe Sanh St; Chiles Ave at Evans St; Sheridan Ave at Prussman Blvd; Wetzel Ave at Hogan St; Wetzel Ave at Old Reliable Rd; Specker Ave at Old Reliable Rd; Butts Rd at Airfield Rd; Wilderness Rd near Range Operations Headquarters; Mist St at Midblock; Nelson Blvd near Bldg 1435.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-075, 2019-173, & 2019-288 Quarterly Record of Environmental Consideration (REC) for Training	DPT19QTR2 DPT19QTR3 DPT19QTR4	Main Post Downrange Fort Carson PCMS-wide	BE I. C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/26/2018 3/11/2019	Per Fort Carson Regulation 200-1, each quarter the Record of Environmental Consideration (REC) for training will be updated. This quarterly training REC covers use of established ranges, drop zones, landing zones, and other training facilities; maneuver training (mounted, dismounted, and aerial); excavation training; etc. It does not cover brigade-sized training exercises, which are reviewed separately. In addition, excavation training is reviewed by the Cultural Resources Program on a case-by-case basis. Updated GIS layers of protected resources restrictions, as well as Standard Operating Procedures (SOPs) and cultural resources awareness training briefs for Fort Carson and PCMS are provided to DPTMS for planning purposes.
2019-076 & 2019-236 Renovation Project for Butts Road Contractor Yard, Fort Carson	DPW18-141	Main Post	BE I.A1 BE I.A2 BE I.B3	12/3/2018 5/6/2019	Replace damaged fence and install new dividing fence to make two separate construction yards. Install 5 new gates; conduct vegetation clearing; and remove debris and material. 2019-076 is the initial review; 2019-236 is an updated NEPA review, as it has been six months since last review and project has not been initiated.
2019-077 Upgrades to Regimental Room, Bldg 7462	SFG19-007	Main Post	BE I.A2	12/4/2018	Install baseboard trim, chair rails, and additional trim to the Regimental Room. Hero photographs will also be placed on the memorial wall.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-078 Upgrades to Serving Area, Bldg 7462	SFG19-008	Main Post	BE I.A2	12/4/2018	Install a 98-inch by x25-inch cabinet with countertop; and adding a mirror, locking shelving, and cabinet hardware to existing cabinets. One LED direct wire light will be added to an existing junction box.
2019-080 7000 Area Sanitary Sewer Collection System Repair	DPW17-052	Main Post	BE I.A2	12/6/2018	Replace approximately 1,525 linear feet of sanitary sewer piping ranging in size from 6 inch to 10 inch diameter pipe; replace 9 sanitary sewer manholes. Refurbish approximately 3,590 linear feet of sanitary sewer piping ranging in size from 6 inch to 12 inch, refurbish 15 sanitary sewer manholes, and make 2 spot sewer pipe repairs. Refurbished sewer pipe shall be repaired by utilizing cured in place pipe (CIPP) trenchless technology. Sewer pipe replacement shall use plastic pipe material. Manhole replacement includes new ring and covers. Refurbished manholes shall utilize spray on manhole rehabilitation products designed for use with sanitary sewer collection systems. The manhole ring and cover shall also be replaced with the manhole refurbishing.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-081 8000 Area Sanitary Sewer Repair	DPW12-150	Main Post	BE I.A2	12/6/2018	<p>Replace approximately 4,400 linear feet of sanitary sewer piping ranging in size from 6 inch to 10 inch diameter pipe, replace 28 sanitary sewer manholes, and make 1 spot repair. All sanitary sewer manhole shall be replaced with new manholes. Sewer pipe underneath concrete motor pool hardstands can be repaired by utilizing cured in place pipe (CIPP) or replaced by open trench. All other sewer pipe shall be replaced. The spot repair can be accomplished with a CIPP point repair or repaired by open cut.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2016-351 and 2012-258.</p>
2019-087 Install Flag Pole, Bldg 1048	DPW19-043	Main Post	BE I.A1	12/10/2018	
2019-088 Demolish Bldgs 207 & 209	DPW19-039	Main Post	BE I.A3	12/11/2018	
2019-089 Demolish Bldg 636	DPW19-040	Main Post	BE I.A3	12/11/2018	
2019-090 Demolish Bldgs 220 & 221	DPW19-041	Main Post	BE I.A3	12/11/2018	
2019-092 Military Police Training, Bldg 221	TEN19-010	Main Post	BE I.A3	12/11/2018	The Military Police proposes to conduct training in a building that is slated for demolition.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-093 Ditch Maintenance & Repair, O'Connell to Ellis	SO 963125	Main Post	BE I.A2 BE I.B2	12/12/2018	Remove sediment to restore proper flow in ditch. Small trees and tamarisk encroaching into the ditch will be removed. Rip rap checks will be installed at regular spacing to control grade. Straw waddles, seeding, and hydromulching will be used as needed to stabilize the ditch and banks.
2019-094 & 2019-145 Repair Drainage Ditch between Bldgs 9633 & 9660	DPW17-064	Main Post	BE I.A1 BE I.B2	12/12/2018 2/6/2019	2019-094 & 2019-145 are updated NEPA reviews of the project. Undertaking has been previously reviewed under NEPA project number 2017-078.
2019-097 Repair Leak in Potable Waterline at Turkey Creek Ranch	n/a	Turkey Creek Complex	BE I.D1b	12/17/2018	
2019-098, 2019-109, 2019-121, 2019-300, & 2019-307 Dining Facility Upgrades, Bldgs 1444, 2061, 2330, 7481, & 9439	DPW19-045 DPW19-058 DPW19-085	Main Post	BE I.A2	12/18/2018 1/8/2019 1/14/2019 7/11/2019 7/16/2019	Similar projects to upgrade the dining facilities were combined into one project under NEPA project number 2019-307.
2019-101 Turkey Creek Fire Hydrant Line Repair	SO 967627	Turkey Creek Complex	BE I.D1b	1/7/2019	Place soil/clay, fabric, and rip-rap over exposed non-potable fire suppression line in Turkey Creek. This is to avoid the line freezing or being washed away due to its location in the drainage across from Building 10000.
2019-104, 2019-105, 2019-106, & 2019-107 Construct Hardstand, Bldgs 9426, 9436, 9456, & 9466, Fort Carson	DPW19-052 DPW19-053 DPW19-054 DPW19-055	Main Post	BE I.A1	1/7/2019	Each hardstand to be constructed will be approximately 6,700 square yards, and includes fence, drainage, and lighting improvements.

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2019-108 Repair Solar Panel Systems, Post-wide	DPW19-050	Main Post	BE I.A2	1/7/2019	
2019-113 Construct Concrete Pad for Three Weapons Storage Buildings (ARMAGs), Bldg 7462	TEN19-009	Main Post	BE I.A1 BE I.A3	1/9/2019	The project includes the construction of an approximate 39-foot by 25-foot by 8-inch structurally engineered, cast-in-place steel-reinforced concrete pad for the anchored installation of three ARMAGs. Installation will include the removal of existing asphalt under the proposed concrete pads area.
2019-114 Replace Carpet in Aspen Room, Bldg 1526	MWR18-026	Main Post	BE I.A2	1/10/2019	
2019-116 Change Door Passage Trims to Locking Trims and Remove Cypher Lock , Bldg 7464	SFG19-010	Main Post	BE I.A2	1/10/2019	
2019-118 Install Water Fountain, Bldg 7404	SFG19-011	Main Post	BE I.A2	1/10/2019	
2019-119 Construction and Operation of a Battlefield Weather Detachment Facility	MCA17-003 PN 81283	Main Post	BE I.A1 BE I.A3	1/11/2019	2019-119 is the review of the Environmental Protection Plan. Undertaking has been previously reviewed under NEPA project numbers 2017-225, 2017-383, 2018-196, & 2018-348.
2019-122 Construct a Vestibule between Bldgs 7500 & 7503	MED19-007	Main Post	BE I.A2	1/15/2019	The vestibule will be located at the existing double doors on the north wall of the hallway that connects these two buildings. Concrete posts will be added to the vestibule pillars.

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2019-123 Remove Wallpaper and Paint / Texture Interior Walls of Entryway, Bldg 1856	MWR19-004	Main Post	BE I.A2	1/15/2019	
2019-124 Replace Metal Shower Stall and Pan, Bldg 1816	TEN18-016	Main Post	BE I.A2	1/16/2019	
2019-126 M110A1 Compact Semi-Automatic Sniper System (CSASS) Limited User Test	n/a	Main Post Downrange Fort Carson	BE I.C3 FC A	1/15/2019	Perform limited user tests of the new M110A1 Compact Semi-Automatic Sniper Systems (CSASS) to generate operational effectiveness and suitability test data.
2019-129 Repair Asphalt, Barkeley Ave from Specker to Ave to Titus Blvd (DPW17-115); Improvements to the Wilderness Rd and Warfighter Rd Intersection (DPW18-004); Improvements to the Butts Rd and Airfield Rd Intersection (DPW18-006)	DPW17-115 DPW18-004 DPW18-006	Main Post	BE I.A1 BE I.A2 BE I.B2	1/17/2019	2019-129 is the review of the Environmental Protection Plan. Undertaking has been previously reviewed under NEPA project numbers 2017-245, 2018-125, and 2018-126.
2019-131 Install Wood Lattice around Dry Sauna, Bldg 1856	MWR19-008	Main Post	BE I.A2	1/24/2019	Remove current wooden barrier and install a new wooden lattice built barrier around the dry sauna heaters from ceiling to floor.
2019-133 Repair Restrooms at Iron Horse Park, Bldgs 1910, 1915, 1917, & 1918	MWR16-023	Main Post	BE I.A2	1/17/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-135 Apply Dust Suppressant to Multiple Roads on Fort Carson	DPW18-019	Main Post Downrange Fort Carson	BE I.A2 FC D1b FC D2b	1/25/2019	Apply magnesium chloride to all priority 1 routes on Fort Carson throughout the year to address routine or emergent dust suppression requirements. Undertaking has been previously reviewed under NEPA project number 2017-368.
2019-137 Repair Leak in Potable Waterline at Turkey Creek Ranch	n/a	Turkey Creek Complex	BE I.D1b	1/28/2019	
2019-139 Install Acoustical Wall Material, Martinez Courthouse, Bldg 6221	GAR18-011	Main Post	BE I.A2	2/1/2019	
2019-140 Renovate 3rd Floor, Bldg 1011	DPW19-061	Main Post	BE I.A2	1/31/2019	Project includes replacing/repairing flooring as needed; patching and painting; removal of secure internet protocol router (SIPR) system; and installation of power, voice, and data at workstations.
2019-142 Install and Adjust Lighting, Bldg 330	CIV19-005	Main Post	BE I.A2	2/5/2019	
2019-143 Install Track Lighting, Bldg.1219	DPW19-057	Main Post	BE I.A2	2/5/2019	Install track lighting in DPW Engineering (outside of BOLD) hallway in between the 2 conduit lines.

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2019-144 & 2019-360 Construct Cellular Tower, Fort Carson	DIR17-018	Main Post	BE I.A1	2/6/2018 9/9/2019	2019-144 is the review of geotechnical testing. 2019-360 is an updated NEPA review of the project, as it has been over six months since last review and project has not been initiated. Tower will be constructed near Bldg 1532. Undertaking has been previously reviewed under NEPA project number 2017-314.
2019-147 Invasive Species Treatments, Fort Carson and PCMS	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	2/6/2019	The project is to eradicate invasive plant species using mechanical, biological, and/or approved chemical treatment on the identified areas at Fort Carson and PCMS. Information provided to proponent for avoidance of protected cultural resources.
2019-148 Renovate Bldg 3660	DPW18-071	Main Post	BE I.A2	2/7/2019	The work involves patching and painting the interior ceiling and walls, and replacing door frames. 2019-148 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA project number 2018-209.
2019-149 Install Bird Netting, Bldgs 1280, 9067, & 9079	DPW17-068	Main Post	BE I.A2	2/11/2019	

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2019-157 Install New Electrical Outlets and Circuits, Bldg 2355	CIV19-007	Main Post	BE I.A2	2/14/2019	
2019-158 Building Repairs, Bldgs 6236 & 6237	GAR17-004	Main Post	BE I.A2	2/19/2019	The work includes installing a railing around the landing; securing the confined space located on the north side of Bldg 6236; and repairing the aboveground tunnel between Bldgs 6236 & 6237.
2019-162 Construction and Operation of a Colorado Army National Guard (COARNG) Readiness Center on Fort Carson	PN 80115	Main Post	BE I.A1	2/19/2019	2019-162 is an updated NEPA review of the project, as it has been over six months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA project numbers 2013-132, 2013-324, 2017-046, 2017-086, 2017-184, 2017-189, 2017-199, 2017-233, & 2017-265.
2019-164 Repair/Replace Fiber Optics, Bldg 7500	DPW19-065	Main Post	BE I.A1 BE I.A2	2/21/2019	
2019-166 Remodel Classroom #204, Bldg 9120	TEN19-019	Main Post	BE I.A2	2/25/2019	The work includes the installation of new drywall, sound-rated doors, new receptacles, movement of supply and returns; new drop ceiling; and two sprinkler heads will be relocated to accommodate new room layout and meet appropriate life safety standards.
2019-167 Install Electrical Outlets, Bldg 2355	MWR19-009	Main Post	BE I.A2	3/4/2019	

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2019-169 Install Exit Signs in the Corridors, Bldg 6058	MWR19-008	Main Post	BE I.A2	3/5/2019	
2019-170 Install Electrical Outlets, Bldg 2135	DPT19-014	Main Post	BE I.A2	3/6/2019	
2019-171 Replace Utility Pole, Turkey Creek Ranch	SO 96142	Turkey Creek Complex	BE I.D1b	3/6/2019	
2019-172 Demolition of LAMS-A Hangar Tents, Butts Army Airfield	BAA19-001	Main Post	BE I.A3	3/11/2019	LAMS-A Hangar Tents are quick-to-erect, clear-span, fabric-covered, rapid-deployment aircraft maintenance shelters and/or hangar systems.
2019-174 Install Start and Finish Line Track Signs near Bldg 1160	SPC19-008	Main Post	BE I.A1 BE I.B1	3/12/2019	
2019-175 Ammunition Supply Point (ASP) Expansion	PN 73375	Main Post	BE I.A1	3/14/2019	2019-175 is the final design review. Undertaking has been previously reviewed under NEPA project numbers 2017-229, 2017-297, 2018-131, and 2018-195.
2019-176 Install Electrical Outlets and Circuits, Bldg 2061	CIV19-006	Main Post	BE I.A2	3/18/2019	

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2019-178 & 374 Construction of Three Company Operations Facilities (COFs) near Butts Army Airfield (BAAF)	PN 77303	Main Post	BE I.A1 BE I.A2	3/18/2019 9/16/2019	2019-178 is the 65% design review. 2019-374 is the 95% design review. Section 106 consultation was completed on 10/21/2011 prior to the execution of the Fort Carson Built Environment PA. Undertaking has been previously reviewed under NEPA project numbers CF2011-011 and 2018-229
2019-180 Remove Reception Desk, Bldg 1118	GAR18-016	Main Post	BE I.A2	3/19/2019	
2019-181 Arbor Day Tree Planting, Bldg 6200	GAR19-009	Main Post	BE I.B3	3/19/2019	
2019-183 Replace Boiler #1, Bldg 1860	DPW19-056	Main Post	BE I.A2	3/20/2019	
2019-184 Renovate Pharmacy, Bldg 7500	MED19-009	Main Post	BE I.A2	3/20/2019	
2019-185 Install Air Conditioning System in Data Center Room, Bldg 7500	MED19-010	Main Post	BE I.A2	3/20/2019	
2019-186 Repair Dirty Cart Lift Door, Bldg 7500	MED19-011	Main Post	BE I.A2	3/21/2019	
2019-187 Repair Clean Cart Lift Door, Bldg 7500	MED19-012	Main Post	BE I.A2	3/21/2019	
2019-188 Replace Fire Pump Back Flow, Bldg 7500	MED19-013	Main Post	BE I.A2	3/21/2019	

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2019-189 Hang BodPod Banner, Bldg 1843	MED19-008	Main Post	BE I.A2	3/21/2019	
2019-190 Replace Emergency Generator Paralleling Gear, Bldg 7501	MED19-014	Main Post	BE I.A2	3/26/2019	
2019-192 Prairie Dog Extermination, Butts Army Airfield (BAAF)	DPW19-069	Main Post	BE I.B3	3/27/2019	
2019-193 Form Concrete Curb Areas, Bldg 7500	MED19-015	Main Post	BE I.A2	4/1/2019	Replace the river rock in the void area between the curbs for parking lots A, G, and H with colored concrete.
2019-194 Roof Repair, Bldg 2059	MED19-016	Main Post	BE I.A2	4/1/2019	
2019-195 Extend Fence in Parking Lot B, Bldg 7500	MED19-017	Main Post	BE I.A1 BE I.A2	4/1/2019	Extend black chain link fence from the west perimeter of Parking Lot B (corner of Harr Ave. and Cochrane Circle) around to enclose the SW corner and the south perimeter of the lot.
2019-196, 2019-246, & 2019-292 Install Electrical Outlets, Bldgs 1219, 2492, 2692, 2792, 2992, 3092, & 9072	1BD19-005	Main Post	BE I.A2	4/1/2019 5/16/2019 7/2/2019	Both 2019-246 and 2019-292 included additional buildings to the project request.
2019-197 Replace Concrete Loading Dock, Bldg 7500	MED19-018	Main Post	BE I.A2	4/2/2019	
2019-199 Ditch Maintenance at Ellis and Chiles	SO 979677	Main Post	BE I.A2 BE I.B2	3/29/2019	Remove silt, tamarisk, and trash in ditch to restore proper flow. Apply rip-rap, waddles, and native grass seed.
2019-200 Install Conduit from Bldg 9690 to Control Cab Bldg	TEN19-020	Main Post	BE I.A1 BE I.A2	3/29/2019	

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2019-201 Construct 20-foot by 20-foot Concrete Pad, Bldg 8012	4ID19-008	Main Post	BE I.A1	3/29/2019	
2019-202 & 2019-261 Construction and Operation of a Training Facility, Fort Carson	n/a	Main Post	BE I.A1	4/1/2019 6/5/2019	It is proposed to construct and operate a 12,000-square-foot training facility with associated parking off of Butts Road next to the HazMat storage location across from Ranges 49 and 51. 2019-202 is the site location approval. 2019-261 is the initial review of the project at the proposed location.
2019-209 Wall Outlet Replacement, Bldg 1517	DPT19-016	Main Post	BE I.A2	4/10/2019	
2019-210 Install Audio Video Equipment, Rooms 122 and 139, Bldg 9662	BAA19-004	Main Post	BE I.A2	4/11/2019	
2019-212 Renovate Anterooms 2919 and 2920, Bldg 7500	MED19-019	Main Post	BE I.A2	4/11/2019	
2019-213 Install Electrical Outlets, Bldg 3192	1BD18-017	Main Post	BE I.A2	4/15/2019	
2019-214 Install Electrical Outlets, Bldg 8932	RES19-001	Main Post	BE I.A2	4/15/2019	

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2019-216 Remodel Bldgs 2419 and 2423 to Create Classrooms	4ID16-007	Main Post	BE I.A2	4/16/2019	2019-216 is an updated NEPA review of the project, as it has been over six months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA project numbers 2016-493 & 2018-184.
2019-217 Installation of Fiber Optic Cable, Sam Houston Loop and Harr Ave	MWR19-013	Main Post	BE I.A1	4/16/2019	
2019-218 Roof Repair, Bldgs 980, 1011, 1012, 1515, 2160, 3492, 3851, 3852, 3900, & 8010	DPW19-046	Main Post	BE I.A2 BE I.D1j	4/18/2019	
2019-219 Roof Repair, Bldgs 842, 1925, and 2428	DPW19-047	Main Post	BE I.A2	4/18/2019	
2019-223 Renovate Bldgs 307, 308, 309, & 310 and Demolish Bldg 311	DPW18-045	Main Post	BE I.A2 BE I.A3	4/22/2019	
2019-224 Roof Repair, Bldgs 1525, 1551, & 6110	DPW19-048	Main Post	BE I.A2	4/22/2019	
2019-225 & 2019-258 Benham & Blair Barracks Quad Improvements, Bldgs 2155 and 2156	DPW18-003	Main Post	BE I.A1 BE I.A2 BE I.A3 BE I.B1 BE I.B2 BE I.B3	4/18/2019 6/4/2019	2019-225 is the 60% design review. 2019-258 is the 100% design review. Undertaking has been previously reviewed under NEPA project numbers 2018-041 & 2018-263.
2019-227 Construct and Operate a Physical Fitness Facility	PN 58139	Main Post	BE I.A1	4/24/2019	2019-227 is the 35% design review.

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2019-228 Install Barriers, Ranges 3 & 5	DPT19-021	Main Post	BE I.A1	4/25/2019	
2019-229 Replace North Loop Chilled Water Line	DPW13-012 DPW13-013	Main Post	BE I.A1 BE I.A2 BE I.A3	4/30/2019	2019-229 is the review of the Biddability, Constructability, Operability, Environmental, and Sustainment (BCOES) review packet for the chilled water line at Bldg 1864. Undertaking has been previously reviewed under NEPA project numbers 2014-435, 2014-489, 2015-331, 2016-100, 2016-212, 2016-301, 2016-383, 2017-336, 2017-354, 2017-391, 2017-392, & 2018-145.
2019-230 Roof Repair, Bldg 2132	DPW19-077	Main Post	BE I.A2	5/2/2019	
2019-231 Refurbish Outdoor Basketball Court, Bldg 5950	MWR19-017	Main Post	BE I.A2	5/2/2019	Resurface the existing outdoor basketball. Install two permanent basketball goals and paint 4-square court and hopscotch area.
2019-232 Installation of Banners, Multiple Fitness Facilities	4ID19-011	Main Post	BE I.A2	5/6/2019	Install 20 vinyl banners that are mounted to plastic clips on the interior walls at Iron Horse, Waller Gym, Garcia Gym, and McKibben Gym.
2019-234 Empty and Clean Fuel Tanks, Bldgs 9537 & 9538	CIV19-008	Main Post	BE I.C2	5/6/2019	
2019-238 Construct and Operate Express Facility Initial Future Express Site Review	n/a	Main Post	BE I.A1	5/2/2019	This is a review of two proposed locations for a new Express facility (gas station).

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2019-241 The Home Depot Foundation Volunteer Program Renovation Project, Bldgs 300 & 301 (Project Cancelled)	GAR19-013	Main Post	BE I.A2	5/13/2019	Project cancelled on 23 July 2019 due to Fort Carson's inability to receive funds from non-military agencies.
2019-242 Install U-Shape Steel Picket Fence, Bldgs 2072 & 2073	4ID19-013	Main Post	BE I.A1	5/13/2019	
2019-245 52nd Brigade Engineer Battalion Excavation Training Request, Range 62, Fort Carson	n/a	Main Post	BE I.C3	5/16/2019	
2019-250 Ditch Maintenance, Bldgs 342 & 343	SO 998469	Main Post	BE I.A2 BE I.B2	5/20/2019	Remove sediment, trash, weeds, and rip rap in ditch draining parking lots. Replace culverts and restore grade. Line the ditch with fabric and rip rap.
2019-251 Install Tent Stakes for Event, Bldg 1500	GAR19-014	Main Post	BE I.B1	5/22/2019	
2019-252 Replace Smoke Detectors with Heat Detectors, Bldgs. 9449, 9459, & 9469	DPW19-078	Main Post	BE I.A2	5/23/2019	
2019-254 Construct Level Shed Platform, Range 4	DPT19-028	Main Post	BE I.A1	5/29/2019	
2019-256 Install Pull-Up and Dip Bars for Pre-Ranger Course, Bldg 9474	2BD19-003	Main Post	BE I.A1 BE I.B1	5/30/2019	
2019-260 Wall Repair, Bldg 7412	SFG19-016	Main Post	BE I.A2	6/4/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-263 & 2019-302 Special Operations Forces (SOF) Tactical Equipment Maintenance Facility (TEMF)	PN 66326	Main Post	BE I.A1 BE I.A3	6/5/2019 7/11/2019	2019-263 is the 35% design review. 2019-302 is the corrected 35% design review.
2019-264 Install Eyewash Station, Bldg 1843	MED19-020	Main Post	BE I.A2	6/6/2019	
2019-265 Fire Department Training Center Renovation, Bldg 3669	DIR19-011	Main Post	BE I.A2	6/6/2019	The work includes replacing desktops, refacing desk fronts, and staining the attached deck.
2019-266 Commanding General's 4th on the 29th Celebration	4ID19-017	Main Post	BE I.B1	6/11/2019	Project is place large tents temporarily at 60 St. Lo Circle. Tents are to be staked down. Also need utilities below ground located in backyard and around sides of yard, to include outside of fence extending 100 feet in all directions from structure / outer fence.
2019-267 Demolish Gazebo, Bldg 2076A	DPW19-081	Main Post	BE I.A3	6/12/2019	
2019-268 Convert Bowling Center Pro Shop into Better Opportunities for Single Service Members (BOSS) Lounge, Bldg 1511	MWR19-006	Main Post	BE I.A2	5/29/2019	
2019-271 Repair Hardstand, Bldg 3292	DPW19-005	Main Post	BE I.A2	6/17/2019	Replace concrete hardstand and base course as needed.
2019-274 Freedom Fest 2019	MWR19-021	Main Post	BE I.B1	6/18/2019	Installation of temporary fencing for safety during the Freedom Fest held at Iron Horse Park.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-277 Repair Solar I Array on Butts Rd	DPW19-086	Main Post	BE I.A2	6/21/2019	
2019-278 2019 Spartan Race	n/a	Main Post	BE I.A1 BE I.A3 BE I.B1	6/24/2019	Construct and demolish obstacles for the annual Spartan Race.
2019-279 Construct and Deconstruct Temporary Tactical Operations Center, TA Bravo	1BD19-009	Main Post	BE I.A1 BE I.A3	6/24/2019	
2019-283 Repair Failing Master Clock System, Bldg 7500	MED19-021	Main Post	BE I.A2	6/26/2019	
2019-287 Install Electrical Shore Power, Bldg 9629	BAA19-006	Main Post	BE I.A2	7/1/2019	
2019-289 Install Parking Lot Signs, Bldg 7500	MED19-022	Main Post	BE I.A1	7/1/2019	
2019-290 Install Roll-Up Doors or Window for the Shop Office, Bldg 2492	4ID19-007	Main Post	BE I.A2	7/1/2019	
2019-291 52nd Brigade Engineer Battalion Excavation Training Request, Range 62, Fort Carson	n/a	Main Post	BE I.C3	7/1/2019	
2019-296 Install Voting Box and Camera, Bldg 1525	GAR19-017	Main Post	BE I.A2	7/10/2019	
2019-298 Construct Army Combat Fitness Test (ACFT) Pull-Up Pods	4ID19-019	Main Post	BE I.A1	7/11/2019	The work includes the construction of eight pull-up pod sets at up to five locations.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-301 Install Communications Cable, Bldg. 1959	SPC19-009	Main Post	BE I.A1	7/11/2019	Install communication cable in Rooms 156 and 167.
2019-303 Expand Surgery Pre-Op Area, Bldg 7500	MED19-023	Main Post	BE I.A2	7/15/2019	Expand the number of patient curtain areas from seven small to ten large curtain areas in Room 2705.
2019-304 Install 220-volt Outlet, Bldg 1805	DIR19-014	Main Post	BE I.A2	7/15/2019	
2019-305 Installation of 240-volt Washer Extractor Line, Rm 142, Bldg 9665	DIR19-004	Main Post	BE I.A1 BE I.A2	7/15/2019	
2019-308 Repair Airfield Pavement Failures Runway, Taxiway Echo	BAA19-010	Main Post	BE I.A2	7/16/2019	The work includes identifying reason for pavement failure and loss of soil, repair pavement and base / subbase, and replacing storm water lines.
2019-309 Install Ground-Fault Circuit Interrupter (GFCI) Electrical Outlets, Bldg 1210	TEN18-042	Main Post	BE I.A2	7/16/2019	
2019-310 Install Electrical Outlets, Bldg 8000	CIV18-002	Main Post	BE I.A2	7/16/2019	
2019-312 Install Electrical Outlets, Gates 1, 2, 3, 4, 5, and 20	DIR18-015	Main Post	BE I.A2	7/16/2019	
2019-313 Install Bollards and Signs at Schools, Bldgs 6070, 6205, & 5506	GAR19-018	Main Post	BE I.A2	7/16/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-314 Install Electrical Receptacles and Network Cubicle Drop, Rm 4-106, Bldg 1362	TEN19-001	Main Post	BE I.A2	7/17/2019	
2019-317 Replace Dance Floor in Ballroom, Bldg 7300	MWR19-024	Main Post	BE I.A2	7/18/2019	
2019-318 Demolition of Bldgs 8472 and 8472D (Project Cancelled)	TEN19-023	Main Post	BE I.A3	7/22/2019	Project was cancelled.
2019-322 Construct and Deconstruct Temporary Tactical Operations Center, Rough Rider Field	4SB19-009	Main Post	BE I.A1 BE I.A3	8/5/2019	
2019-324 Construct Obstacle Course, TA Bravo	n/a	Main Post	BE I.A1	8/6/2019	
2019-325 Complete 100-foot Directional Bore / Relocate Cable Television (CATV) Cable, Bldg 2155	MWR19-033	Main Post	BE I.A1 BE I.A3	8/7/2019	Building 2155 is being demolished, so the CATV cables need to be rerouted to Buildings 2150 and 2151.
2019-329 Upgrade Audio/Visual in Room 102, Bldg 1855	MED19-024	Main Post	BE I.A2	8/8/2019	
2019-330 Candlewood Suites Grand Opening Event, Bldg 7306	GAR19-019	Main Post	BE I.B1	8/9/2019	Install stakes in ground for an event tent that will be used for the Cottonwood Suites Grand Opening.
2019-333 Upgrade Shore Power, Bldg 1435	4ID19-023	Main Post	BE I.A2	8/14/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-334 Security Upgrades for National Crime Information Center (NCIC), Bldg 6012	DIR19-017	Main Post	BE I.A2	8/15/2019	The work includes: 1) installation of tempered glass with access gap on bottom; 2) installation of communication ports from existing counter top to height of approximately 86 inches from the floor surface; 3) and replacing existing half-doors with standard 36-inch doors and framework that secures with cypher lock-sets.
2019-335 Security Upgrades for National Crime Information Center (NCIC), Bldg 150	DIR19-018	Main Post	BE I.A2	8/15/2019	The work includes replacing existing locksets on all three entry doors with cypher locksets.
2019-336 & 2019-363 Install Interior Doors, Bldg 7400	SFG19-018	Main Post	BE I.A2	8/15/2019 9/10/2019	2019-336 is the initial project review; 2019-363 is a review in the change of scope.
2019-337 Remove Metal Roll-Down Door & Walk Through, Bldg 6222	GAR19-002	Main Post	BE I.A2	8/16/2019	Remove the mechanical roll-down; frame and finish with drywall and paint. The room is being converted to an office space for the Claims Attorney.
2019-339 Install Electrical Outlet, Bldg 330	CIV19-011	Main Post	BE I.A2	8/20/2019	
2019-346 Soil and Water Check, Bldg. 6200	CIV19-013	Main Post	BE I.A2	8/26/2019	Check soil and water content for crawl space repairs and parking lot repairs.
2019-353 Repair Fuel Dispensing Systems at AAFES Stations, Bldgs. 510, 900, & 3600	DPW19-094	Main Post	BE I.A2	9/3/2019	Repair multiple deficiencies identified by Eaton during a routine spill bucket inspection. Repairs are needed under the filling stations, the pump system, secondary containments, and electrical work.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-354 Upgrade Access Control System, Bldg 1550	DIR19-019	Main Post	BE I.A2	9/3/2019	
2019-356 Install Two Showers, Bldg 2460	1BD19-015	Main Post	BE I.A2	9/5/2019	
2019-361 Renovate Bldg 7492 for Army Community Services (ACS)	MWR19-035	Main Post	BE I.A1 BE I.A2	9/9/2019	The work includes installing concrete pad and walkway on east side of building; modifying the fencing; replacing irrigation and grass with landscape rock on east side of building; repairing outlets to supply power to the cubicles; and opening up walk through in Room 106.
2019-362 & 2019-364 Colorado Army National Guard (COARNG) Centennial Training Center Expansion, Fort Carson	n/a	Main Post	BE I.A1	9/6/2019 9/9/2019	2019-362 is the review of the Area Development Plan. 2019-365 is the 95% design review.
2019-364 Install Electrical Outlets, Bldg 9633	BAA19-008	Main Post	BE I.A2	9/10/2019	
2019-368 Replace Anthony's Pizza with BUN-D Restaurant, Bldg 6110	CIV19-015	Main Post	BE I.A2	9/16/2019	
2019-370 Fill Oil Pits, Bldgs 8200 & 8205	CIV19-014	Main Post	BE I.A2	9/17/2019	
2019-373 Add Network Lines to Waller Gym Annex, Bldg 2357	1BD19-017	Main Post	BE I.A2	9/17/2019	
2019-376 Replace Fire Alarm System, Bldg 7490	MED19-025	Main Post	BE I.A2	9/18/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-380 Renovate Front Counter, Bldg 1511	MWR19-040	Main Post	BE I.A2	9/26/2019	
2019-381 Renovate Snack Bar and Manager's Office, Bldg 1511	MWR19-041	Main Post	BE I.A2	9/26/2019	
2019-382 Renovate Bldg 1526	MWR20-001	Main Post	BE I.A2	9/27/2019	Renovation will include full replacement of mechanical system, fire alarm system, communications, and some electrical.
2019-383 Trunk or Treat Event, Bldg 1500	GAR19-020	Main Post	BE I.B1	9/30/2019	Install tent for Trunk or Treat Event.

Table 2. Non-Exempted Undertakings Requiring Section 106 Consultation

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-004 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	10/1/2018	HC #73678 2/28/2018	No adverse effects to historic properties 2019-004 is an updated NEPA review of the project, as it has been over six months since last review and portions of the project had not been initiated. Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, 2017-174, 2018-001, 2018-004, 2018-119, & 2018-205.
2019-030, 2019-031, & 2019-115 Installation of Security Measures at Multiple Locations, Fort Carson	DPW18-060 DPW18-061 DPW18-062	Main Post Turkey Creek Complex Downrange Fort Carson	10/17/2018 1/10/2019	HC #75272 12/11/2018	No adverse effect to historic properties.
2019-038 & 2019-367 Repairs to Womack Ditch	SO 951947 SO 1019319	Bird Farm Recreation Area	11/1/2018 9/11/2019	HC #751411 1/9/2019	No adverse effects to historic properties 2019-038 is the initial review; 2019-367 is an updated service order to remove clog from same area of ditch.
2019-136, 2019-233, 2019-273, & 2019-355 Construction, Operation, and Maintenance of a Satellite Fire Station	PN 76447	Turkey Creek Complex	1/25/2019 5/6/2019 6/17/2019 9/4/2019	HC #76335 8/12/2019	No adverse effects to historic properties 2019-136 is the 35% design review. 2019-233 is the updated 35% design updated review. 2019-273 is the 95% design review. 2019-355 is an updated NEPA review of the project.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-141 Replace Non-Potable Waterline between Bldg 9302 & 9313 (On Hold)	SO 966643	Bird Farm Recreation Area	2/4/2019		Section 106 consultation has not been initiated. Project is on hold. Consultation will be initiated once proponent provides updated work request.
2019-152 Repair Dam at Haymes Reservoir	DPW16-015 DPW17-039 SO 771662	Haymes Reservoir	2/31/2019	HC #70172 2/1/2017	No historic properties affected 2019-152 is an updated NEPA review of the project, as it has been over six months since last review and the project has not been initiated. Undertaking has been previously reviewed under NEPA project numbers 2016-201, 2016-462, 2017-272, 2018-157, & 2018-328.
2019-168 Pasture Improvements, Turkey Creek Complex	DPW19-064	Turkey Creek Complex	2/26/2019	HC #76234 7/16/2019	No adverse effects to historic properties
2019-208 Replace Water Main along Northern Boundary of Fort Carson	DPW17-112	Main Post Off Post	4/8/2019	HC #72975 10/30/2017	No historic properties affected 2019-208 is the 60% design review. Undertaking has been previously reviewed under NEPA project numbers 2017-374, 2018-237, & 2018-275.
2019-243 Construction, Operation, and Maintenance of a Recreational Vehicle Park, Camp Falcon	PN 82101	Camp Falcon	5/10/2019	HC #76220 8/2/2019	No adverse effects to historic properties

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-259 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	DPT18-032	Bird Farm Recreation Area Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	6/4/2019		Section 106 consultation is ongoing for the portions within Bird Farm Recreation Area, Ammunition Holding Area (AHA), and Turkey Creek Complex Pastures. Undertaking has been previously reviewed under NEPA project number 2018-333.
2019-269 60th Ordnance Company Excavation Training Request, TA 3, Fort Carson (Project Cancelled)	n/a	Main Post	6/12/2019		Unit cancelled request prior to initiation of Section 106 consultation
2019-286 230th Financial Management Support Unit Excavation Training Request, TA 4, Fort Carson (Project Cancelled)	n/a	Main Post	6/27/2019	HC #76220 8/2/2019	No historic properties affected. Unit cancelled request.
2019-321 Operation of the MQ-1C Gray Eagle or Similar Unmanned Aerial System in National Airspace	n/a	Main Post Downrange Fort Carson PCMS-wide Off Post	8/1/2019	HC #76656 10/17/2019	No adverse effects Section 106 consultation is in progress. Colorado Council of Professional Archaeologists, Not 1 More Acre!, and Otero County Board of Commissioners have expressed concerns about the proposed undertaking.
2019-369 Remove Flight Restrictions over Turkey Creek Ranch	n/a	Turkey Creek Complex	9/16/2019		Section 106 consultation has not been initiated.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-371 Vegetation Thinning along Installation Perimeter Firebreak, Fort Carson	DPW19-098	Turkey Creek Complex Downrange Fort Carson	9/17/2019		No adverse effects to historic properties. Section 106 consultation for portion within Turkey Creek Complex was initiated on 10/23/2019.
2019-379 Forest Thinning, Fort Carson	DPW19-107	Camp Falcon Main Post	9/24/2019		Section 106 consultation has not been initiated.

Table 3. Other Non-Exempted Undertakings

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2019-035 Water Purification Equipment Training, Townsend Reservoir	n/a	Townsend Reservoir	10/19/2018	No potential to effect historic properties.
2019-037 Best Sapper Competition at Iron Horse Field	n/a	Main Post	10/30/2018	The event will include parking five Light Medium Tactical Vehicles (wheeled) with trailers on the field to use as a platform for stacking sandbags as part of the Best Sapper Competition. There will not be any digging, picket pounding, or any other ground disturbing activities. No concerns
2019-079 Punishment Detail, Bldg 9648	4ID19-004	Main Post	12/6/2019	Continuously digging foxhole by hand with a shovel and filling it back in. No concerns
2019-084 License Renewal for Verizon Wireless on Global Signal Acquisitions II, INC Tower on Signal Hill	n/a	Main Post	12/10/2018	Renew the existing license for Verizon Wireless on Global Signal Acquisition II, Inc., Tower on Signal Hill. No potential to effect historic properties
2019-091 Comprehensive Environmental Management Plan Review	n/a	Main Post	12/11/2018	Document Review
2019-125 Joint Persona Property Office-North Central (JPPSO-NC), Bldg 1525, Permit Renewal	n/a	Main Post	1/17/2019	Renew an existing permit for a period of five years to the Joint Personal Property Office-North Central. No potential to effect historic properties

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2019-127 City of Fountain Powerline, Easement Renewal	n/a	Main Post Downrange Fort Carson	1/17/2019	Renew an existing easement for a period of 25 years to the City of Fountain for a powerline that crosses Fort Carson. No potential to effect historic properties
2019-128 Community Partnership for Child Development (CPCD), Bldg 2765, Lease Renewal	n/a	Main Post	1/17/2019	Renew an existing lease for a period of five years to the Community Partnership for Child Development (CPCD). No potential to effect historic properties
2019-275 Annual Native American Spiritual Encampment	n/a	Turkey Creek Complex	6/19/2019	This is an annual event that occurs at the Inipi Sweat Lodge. No concerns
2019-323 Cultural and Natural Resources Management Plan for Fort Carson Family Housing	n/a	Main Post	8/1/2019	Document Review
2019-345 Annual Review of the Implementation of the FY2017-2021 Fort Carson Integrated Cultural Resources Management Plan	n/a	n/a	8/21/2019	Document Review
2019-352 Active Shooter Training, Bldg 1950	DPT19-032	Main Post	8/28/2019	Use of building 1950 for the installation Annual Active Shooter / Mass Casualty Full Scale Exercise. No potential to effect historic properties
2019-359 Integrated Natural Resources Management Plan (INRMP) 2019-2024 Review	n/a	n/a	9/2/2019	Document Review

ENCLOSURE 2:
SHPO CORRESPONDENCE ON FY18 ANNUAL REPORT



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

Carlos Rivero-deAguilar
Chief, Environmental Division
US Army Installation Management Command
Directorate of Public Works
1626 Evans Street, BLDG 1219
Fort Carson, CO 80913-4143

NOV 29 2018

Re: Fiscal Year (FY) 2018 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear Mr. Rivero-deAguilar:

Thank you for your emailed correspondence dated November 4, 2018 and received by our office the same day regarding review of the Fiscal Year 2018 Annual Reports provided to fulfill:

- Stipulation VII of the *Programmatic Agreement among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Construction, Maintenance, and Operations Activities for Areas on Fort Carson, Colorado, and*
- Stipulation V of the *Programmatic Agreement among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Military Training and Operational Support Activities at Down Range Fort Carson, Colorado, and*
- Stipulation VI of the *Programmatic Agreement Among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Military Training and Operational Support Activities at Pinon Canyon Maneuver Site, Fort Carson, Colorado.*

After review of the documentation provided, we feel it is appropriate to convey our comments in two formats. For comments to specific portions of the Annual Reports, see the appropriate attachment (Attachment 1—Built Environment, Attachment 2—Down Range Fort Carson, Attachment 3—Pinon Canyon). Below, we describe two general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Our first general comment is that many of the stipulations within these three Programmatic Agreements (PAs) call for continued action and/or maintenance, and we suggest that USAG Fort Carson renew efforts in these areas. One area where we note that renewed efforts could be profitable is the Cultural Awareness Training. While the Cultural Awareness Training program, including the PowerPoint presentations, is useful, we suggest that to comply with the PAs, USAG Fort Carson should periodically assess how these trainings are directly affecting cultural resources. How has the number of inadvertent entries to sites changed since the current program was created? Are there fewer impacts to sites or has there been no change to the impacts? We suggest that while there are many factors that contribute to negative impacts to individual sites, when looking at quantitative information regarding sites entered at Pinon Canyon Maneuver Site (PCMS), there is little to suggest that the current Cultural Awareness Program is decreasing the number of sites impacted by brigade trainings. During the 2010 training, 39 sites were entered, 22 sites were entered in 2013, 48 sites were entered in 2015, 45 sites were entered in 2017, and to



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date, our office has been notified of entry into 65 sites during 2018. This quantitative data suggests that the current program should be amended and adjusted. The current program is aimed at particular soldiers at the unit level (Environmental Protection Officers), but we suggest that all command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis to emphasize that, although they may be in command of the training exercise, they must also require their troops to comply with regulations and laws to protect cultural resources. We feel that if education and compliance is emphasized for both high and low ranking soldiers, these measures may be more effective.

A second area where we believe renewed efforts will be beneficial is in completing documentation of the cultural resources managed by USAG Fort Carson. At Down Range Fort Carson (DRFC), the PA task tracker lists 23 sites that have not been fully documented. We suggest prioritizing documentation of these sites and sites at PCMS as well as the various mitigation projects agreed to in the DRFC PA, including the Native American Ethnographic Oral History Project, the Archaeological Context Project, and the Santa Fe Trail Community Outreach Project. We suggest that completing the re-assessment of the Turkey Creek Rock Art District (HC#72565) should also be prioritized in order to better protect the important cultural resources within DRFC. Our office requested in a letter dated August 20, 2018 (HC#72565) that USAG Fort Carson determine how the district will be defined and managed in the future prior to providing comment on the 24 sites within Turkey Creek which could contribute to the district under one or more of the proposed definitions and urge USAG Fort Carson to renew efforts to refine the district definition.

Our second general comment concerns the training exercises conducted by USAG Fort Carson. While many of the activities associated with training exercises were categorized as exempted activities within the PAs, we suggest that military use of the landscape has the potential to adversely affect historic properties. As such, our office suggests that while the minimization measures used to date should be continued, mitigation of adverse effects should also begin. We request that USAG Fort Carson initiate consultation to mitigate the direct, indirect, and cumulative adverse effects of military use of DRFC and PCMS.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us, Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or jason.obrien@state.co.us, or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



Attachment 1:

SHPO Comments on FY2018 Fort Carson Built Environment PA Annual Report (HC#58731)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2018-182: Is there additional information regarding how consulting party comments were addressed with respect to sealant color, grain silo footings, etc.? We request that if these comments have not been addressed, that this response is prioritized during Fiscal Year 2019 and that SHPO is forwarded a copy of the response.

III. Action Updates

A. Cultural Resources Awareness Training

No comments.

B. Inventory and Survey of the APEs

No comments.

C. Exempted Undertakings

No comments.

D. Expanding the APEs for Exempted Undertakings

No comments.

E. Inadvertent Discoveries

No comments.

F. Emergency Response per 36 CFR 800.12

No comments.

G. Amendment

We look forward to the continued development of a new Fort Carson Built Environment PA. To date, we have had several productive conference calls between USAG Fort Carson, Colorado SHPO, and the ACHP, and anticipate working closely together during Fiscal Year 2019 on additional portions of the agreement.



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H.

No comments.

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FISCAL YEAR (FY) 2019 ANNUAL REPORT:
PROGRAMMATIC AGREEMENT AMONG U.S. ARMY GARRISON FORT CARSON, COLORADO
STATE HISTORIC PRESERVATION OFFICER, AND THE ADVISORY COUNCIL ON HISTORIC
PRESERVATION REGARDING MILITARY TRAINING AND OPERATIONAL SUPPORT ACTIVITIES
DOWN RANGE FORT CARSON, COLORADO

NOVEMBER 15, 2019

The U.S. Army Garrison (USAG) Fort Carson submits the following annual report to the State Historic Preservation Officer (SHPO) and concurring parties in accordance with Stipulation V of the *Programmatic Agreement among U.S. Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Military Training and Operational Support Activities Down Range Fort Carson, Colorado*, hereafter referred to as the Fort Carson Downrange PA. This report covers the period from October 1, 2018, through September 30, 2019, and includes information as outlined in Stipulation V.A. It has been distributed electronically to the SHPO and concurring parties and is available online at: <http://www.carson.army.mil/organizations/dpw.html#three>.

I. Exempted Undertakings

Table 1 of Enclosure 1 lists all exempted undertakings that have been reviewed by the Fort Carson Cultural Resources Management Program (CRMP) between October 1, 2018, and September 30, 2019. Seventy-six undertakings were reviewed that were considered exempted in accordance with Appendix 1 of the Fort Carson Downrange PA.

II. Non-Exempted Undertakings

Table 2 of Enclosure 1 lists all undertakings within the area of potential effects (APE) covered by the Fort Carson Downrange PA that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA). Six undertakings required Section 106 consultation. Section 106 consultation has been completed for two undertakings (2019-003 and 2019-211), is in progress for two undertakings (2019-204 and 2019-321), has not been initiated for one undertaking (2019-134), and needs to be reinitiated for one undertaking due to a change in project scope (2019-163).

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRMP. Two projects are document reviews, and one is a renewal of an existing easement.

III. Action Updates

A. Status of Tasks Implemented under Stipulations I, III, IV, and VI

The Fort Carson Downrange PA Task Tracker (Enclosure 2) provides detailed information regarding the status of the various tasks implemented under Stipulation I, Inventory and

Evaluation of Cultural Resources; Stipulation III, Protection of Historic Properties; Stipulation IV, Monitoring; and Stipulation VI, Mitigation.

B. Cultural Resources Awareness Training

The following cultural resources awareness training materials are provided to Soldiers, civilian employees, contractors, and other users, as appropriate:

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated August 2017
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; available online at: <http://www.carson.army.mil/organizations/dpw.html> (click on the link titled “DPW Programs and Services” on the left side of the page, then scroll up half a screen)
- Cultural Resources Awareness Video – available online at: <http://www.carson.army.mil/organizations/dpw.html#three>

Additional training materials, briefs, and presentations are provided on an as-needed basis, and are typically specific to the situation.

In correspondence dated November 29, 2018 (HC #58731, HC #63877, and HC #65747), the SHPO requested USAG Fort Carson to assess how the cultural resources awareness training materials directly affect the number of inadvertent entries into protected resources. The SHPO further states the current training program does not appear to be effective in decreasing the number of sites impacted by brigade training exercises based on the increased number of entries noted during after action inspections. Enclosure 3 includes their correspondence. USAG Fort Carson has assessed its cultural resources awareness training program, and is currently drafting a response to address the SHPO’s concerns. This response will be sent to the SHPO by late December 2019.

C. Inadvertent Entries and/or Impacts to Historic Properties

During a routine inspection on October 17, 2018, a Fort Carson Conservation Law Enforcement Officer identified a potential vehicle entry into site 5EP1177. He informed the Cultural Resources Manager on October 22, 2018. The SHPO was notified via email on October 24, 2018. At least two wheeled vehicles, e.g. Humvees, drove through the site. The two vehicles entered on an existing two-track road, but deviated from this road, which resulted in matted vegetation and light impressions (less than 2 cm in depth). No cultural features were observed in the tracks. No adverse effects related to the entry occurred at the site. A Memorandum for Record and supporting documentation was submitted to the SHPO on October 2, 2019. Via correspondence dated October 21, 2019 (HC #76682), the SHPO concurred with the finding of no adverse effects to a historic property.

During a routine inspection on January 18, 2019, Tehama archaeologists noted an entry into site 5EP2524. The Cultural Resources Manager learned of this entry on February

11, 2019, and immediately notified the SHPO via email. A single tracked vehicle entered the northeastern boundary of the site near a Seibert marker, and immediately turned and exited the site. The pivot turn resulted in sediment push up to 30 cm. No cultural features nor cultural materials were observed in the tracks. No adverse effects related to the entry occurred at the site. A Memorandum for Record and supporting documentation was submitted to the SHPO on October 2, 2019. Via correspondence dated October 21, 2019 (HC #76682), the SHPO concurred with the finding of no adverse effects to a historic property.

During a routine inspection on January 18, 2019, Tehama archaeologists noted an entry into site 5EP7602. The Cultural Resources Manager learned of this entry on February 11, 2019, and immediately notified the SHPO via email. At least one set of tracked vehicle tracks was observed crossing the center of the site, leaving light impressions (less than 2 cm in depth). The vehicle(s) appeared to have been following a two-track road. Within the eastern portion of the site, there is a large area of disturbance where several tracked vehicles conducted pivot turns. Sediment disturbance in this area is up to 5 cm. The disturbed area includes the location of Feature 1, a thermal feature. No cultural features nor materials were observed within the tracks. Since the feature upon which the eligibility determination is based is located 50 cm below surface, and the sediment disturbance associated with the military training activity did not exceed 5 cm in depth, the integrity of the site has not been compromised. No adverse effects related to the entry occurred at the site. A Memorandum for Record and supporting documentation was submitted to the SHPO on October 2, 2019. Via correspondence dated October 21, 2019 (HC #76682), the SHPO concurred with the finding of no adverse effects to a historic property.

During a routine inspection on February 11, 2019, Tehama archaeologists noted an entry into site 5PE2966. The Cultural Resources Manager was informed of this entry on the same day, and immediately notified the SHPO via email. At least four tracked military vehicles crossed the site, resulting in matted vegetation to slight rutting (less than 5 cm in depth). No cultural features were observed in the tracks. No adverse effects related to the entry occurred at the site. A Memorandum for Record and supporting documentation was submitted to the SHPO on October 2, 2019. Via correspondence dated October 21, 2019 (HC #76682), the SHPO concurred with the finding of no adverse effects to a historic property.

During an after action inspection of the APE for the 2nd Infantry Brigade Combat Team "Warhorse Strike" Training Exercise held in September-October 2019, archaeologists from Sol Solutions noted entries at two sites: 5PE793 and 5PE2966. Documentation of these entries is ongoing. An after action report will be submitted to the SHPO, Native American Tribes, and other consulting and interested parties.

D. Inadvertent Discoveries

There were no inadvertent discoveries during the reporting period.

E. Emergency Response per 36 CFR 800.12

Per 36 CFR 800.12(d), fire suppression activities associated with the following wildland fire events are considered immediate rescue and salvage operations conducted to preserve life or property, and as such, are exempt from the provisions of Section 106. Enclosure 4 includes a table of the wildland fires that occurred within the APE.

F. Amendment

There were no amendments proposed nor executed during the reporting period.

G. Dispute Resolution

There have been no dispute resolution activities during the reporting period.

Report compiled by:

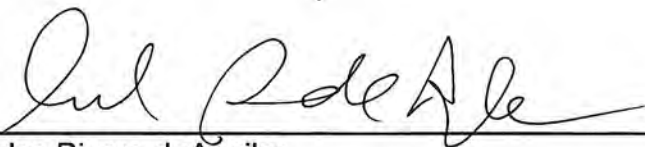
Jennifer R. Kolise
Cultural Resources Manager

Approved by:




Wayne Thomas
Chief, NEPA and Cultural Management Branch

8 Nov 2019
Date



Carlos Rivero-deAguilar
Chief, Environmental Division

13 Nov 2019
Date



Hal Alguire
Director, Public Works

14 Nov 2019
Date

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ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY19 REPORTING PERIOD (OCTOBER 1, 2018, THROUGH SEPTEMBER 30, 2019) UNDER THE FORT CARSON DOWNRANGE PA

Table 1. Exempted Undertakings

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-004 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/1/2018	<p>2019-004 is an updated NEPA review of the FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS, as it has been over six months since last reviewed and portions of the project had not been initiated.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in March 2018 for mechanical fuel reduction within the White Horse Saloon APE (see Enclosure 1, Table 2 of the FY18 Annual Report for the Fort Carson Built Environment PA).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, 2017-174, 2018-001, 2018-004, 2018-119, & 2018-205.</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-010 Vegetation Removal along Firebreaks, TAs 4, 16, & 41, Fort Carson	DPW19-008	Main Post Downrange Fort Carson	BE I.B3 FC D2b	10/2/2018	Mastication of vegetation less than 8 inches at breast height. Larger undesirable trees will be felled, limbed and bucked on site and used for firewood program. The trees will be thinned where the juniper, pinyon and ponderosa pine tree density is too great.
2019-011 Replace Non-Potable Water Line, Range 145	n/a	Downrange Fort Carson	FC D1b	9/26/2018	Replace 2-inch non-potable water line from well to cistern (approx. 6000 feet) with new 2-inch high-density polyethylene pipe. The new pipe will closely follow existing line location. The line will be installed by open trenching and buried with native material.
2019-014 & 2019-154 Repair Culvert, Route 1, R12	DPW18-134	Downrange Fort Carson	FC D1b FC D2a	10/4/2018 2/13/2019	Reconstruct east road embankment over culvert and install grouted riprap slope protection. Repair guardrail east and west side of Route 1. Install rock check dams in roadside ditches, seed all disturbed areas, and install erosion control blankets on all disturbed road embankment slopes.
2019-015 & 2019-155 Repair Culvert, Route 1, R13	DPW18-135	Downrange Fort Carson	FC D1b FC D2a	10/4/2018 2/13/2019	Reconstruct east and west road embankment over culvert and install grouted riprap slope protection. Repair guardrail east and west side of Route 1. Install rock check dams in roadside ditches, seed all disturbed area, and install erosion control blankets on all disturbed road embankment slopes.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-016 Repair Stream Channel, Route 1	DPW18-136	Downrange Fort Carson	FC D1b FC D2a	10/4/2018	Reconstruct concrete low water crossing for tank trail and heavy equipment transport crossing upstream of Bridge P85145. Reshape stream channel in and around Bridge P85145 abutments and install articulating concrete blocks for slope protection. Install grade control structures to protect Bridge P85145 center pier.
2019-030, 2019-031, & 2019-115 Installation of Security Measures at Multiple Locations, Fort Carson	DPW18-060 DPW18-061 DPW18-062	Main Post Turkey Creek Complex Downrange Fort Carson	BE I.A1 FC D1a	10/17/2018 1/10/2019	<p>2019-030 is the review for the installation of security measures at Strobel Well and Gate 1 Water Main Ground Vault. 2019-031 is the review for the installation of ladder access guards on various water tanks. 2019-115 is an updated NEPA review of the project.</p> <p>Section 106 consultation for the installation of security measures at Strobel Well and associated water storage tank in Turkey Creek Complex was completed on 9 January 2019 (see Enclosure 1, Table 2 of the FY19 Annual Report for the Fort Carson Built Environment PA).</p> <p>Security measures to be installed (as needed) include security lighting, intrusion detection systems, security fences, and ladder access guards at the following locations: Wilderness Road Water Tower, Strobel Well and associated water storage tank, Camp Red Devil Water Storage Tank, West Water Storage Tank Facilities, and Gate 1 Water Main Vault.</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-053 59th Quartermaster Company Excavation Training Request, TA 31, Fort Carson	n/a	Downrange Fort Carson	FC C	11/16/2018	
2019-075, 2019-173, & 2019-288 Quarterly Record of Environmental Consideration (REC) for Training	DPT19QTR2 DPT19QTR3 DPT19QTR4	Main Post Downrange Fort Carson PCMS-wide	BE I. C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/26/2018 3/11/2019	Per Fort Carson Regulation 200-1, each quarter the Record of Environmental Consideration (REC) for training will be updated. This quarterly training REC covers use of established ranges, drop zones, landing zones, and other training facilities; maneuver training (mounted, dismounted, and aerial); excavation training; etc. It does not cover brigade-sized training exercises, which are reviewed separately. In addition, excavation training is reviewed by the Cultural Resources Program on a case-by-case basis. Updated GIS layers of protected resources restrictions, as well as Standard Operating Procedures (SOPs) and cultural resources awareness training briefs for Fort Carson and PCMS are provided to DPTMS for planning purposes.
2019-086 Install Artificial Nesting Structure, MSR 1 Tank Trail Crossing, Fort Carson	DPW19-042	Downrange Fort Carson	FC D2a	12/10/2018	The artificial nest box will be made with recycled materials and secured to a 13' utility pole that will be placed in a hand-dug hole 2' in diameter and 3-4' feet deep with a small concrete footing.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-095 & 2019-146 Improve Firefighting Access Downrange Fort Carson	DIR19-007	Downrange Fort Carson	FC D1b FC D2b	12/13/2019	Project includes grading existing two-track roads or firebreaks for fighting access. Appropriate drainage to include, water bars, slopes, or peaked cuts to maintain the longevity of the access through the seasons of the area.
2019-096 52nd Brigade Engineer Battalion Excavation Training Request, TA 19, Fort Carson	n/a	Downrange Fort Carson	FC C	12/17/2018	
2019-100 Repair Camp Red Devil Airstrip	DPW19-049	Downrange Fort Carson	FC D1b	12/20/2018	Remove and replace existing aggregate wearing surface with a new aggregate base course utilizing fractured rock, engineered gradation, moisture conditioned and sealed with a binding compound, on the runway, taxiway and apron. Regrade ditches and adjacent berms created from buildup of runway aggregate to provide proper drainage away from runway.
2019-102 615th Engineer Company Excavation Training Request, TA 13, Fort Carson	n/a	Downrange Fort Carson	FC C	1/7/2019	
2019-110 Install and Maintain New Septic System, Range 123 (Airburst Range)	TEN19-007	Downrange Fort Carson	FC D1a	1/8/2019	A new septic system able to treat 200 gallons a day of effluent will be installed to replace the existing system. Location will be within the existing range footprint of Range 123.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-111 Drill New 6-inch Water Well, Range 123 (Airburst Range)	TEN19-008	Downrange Fort Carson	FC D1a	1/8/2019	Drill new 6-inch water well at Range 123 to replace existing well, which is dry. New well may be drilled as deep as 1200 feet below the surface. Location will be within the existing range footprint of Range 123.
2019-117 569th Engineer Company Excavation Training Request, TAs 12, 13, & 14, Fort Carson	n/a	Downrange Fort Carson	FC C	1/10/2019	
2019-126 M110A1 Compact Semi-Automatic Sniper System (CSASS) Limited User Test	n/a	Main Post Downrange Fort Carson	BE I.C3 FC A	1/15/2019	Perform limited user tests of the new M110A1 Compact Semi-Automatic Sniper System (CSASS) to generate operational effectiveness and suitability test data.
2019-130 615th Engineer Company Excavation Training Request, TA 40, Fort Carson	n/a	Downrange Fort Carson	FC C	1/17/2019	
2019-135 Apply Dust Suppressant to Multiple Roads on Fort Carson	DPW18-019	Main Post Downrange Fort Carson	BE I.A2 FC D1b FC D2b	1/25/2019	Apply magnesium chloride to all priority 1 routes on Fort Carson throughout the year to address routine or emergent dust suppression requirements. Undertaking has been previously reviewed under NEPA project number 2017-368.
2019-138 Watering Hole Project, TA 55, Fort Carson	DPW19-060	Downrange Fort Carson	FC D2a	1/30/2019	This project will entail digging a 7-foot by 3-foot by 3-foot hole by hand in front of a well seep in order to place a catchment trough that will be used by wildlife as a water resource. This trough will be low maintenance and benefit all forms of wildlife given the top of the tank will be at ground level.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-147 Invasive Species Treatments, Fort Carson and PCMS	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	2/6/2019	The project is to eradicate invasive plant species using mechanical, biological, and/or approved chemical treatment on the identified areas at Fort Carson and PCMS. Information provided to proponent for avoidance of protected cultural resources.
2019-150 59th Quartermaster Company Excavation Training Request, TA 40, Fort Carson	n/a	Downrange Fort Carson	FC C	2/11/2019	
2019-160 U.S. Marine Corps Training Exercise, Fort Carson	n/a	Downrange Fort Carson	FC B	2/7/2019	The U.S. Marine Corps will perform training exercises with the Stalker unmanned aerial system (US), which is similar to the Army's Raven UAS, over Ranges 109, 141A, 131B, 135, 133, 127A, and 123.
2019-177 615th Engineer Company Excavation Training Request, TA 40, Fort Carson	n/a	Downrange Fort Carson	FC C	3/15/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-179 Tamarisk Biocontrol Study	DPW18-083	Downrange Fort Carson PCMS Numbered TAs PCMS Lettered TAs	FC D2a FC D2b PC B4b1 PC B4b2 PC D3b1 PC D3b2	3/11/2019	Scientific study to assess the phenology of tamarisk and biocontrol agent, tamarisk leaf beetle, on Fort Carson and PCMS. Surveys will include specimen collection of tamarisk and tamarisk leaf beetles, as well as, time lapse photography of plants. Cameras will be mounted onto trees where available or t-post (or similar post) if necessary. Undertaking has been previously reviewed under NEPA project number 2018-228.
2019-205 Integrated Training Area Management (ITAM) Projects at Fort Carson and PCMS	DPT16-028	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1	4/8/2019	In order to maintain sustainable training lands, the ITAM Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Undertaking has been previously reviewed under NEPA project 2016-459.
2019-206 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 24 and 25) and PCMS (TA 7)	DPT18-024	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1	4/8/2019	In order to maintain sustainable training lands, the ITAM Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Undertaking has been previously reviewed under NEPA project number 2018-306.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-207 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 20, 40, 42, & 55) and PCMS (TA 7)	DPT18-025	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	4/8/2019	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>Undertaking has been previously reviewed under NEPA project number 2018-307.</p>
2019-211 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 21, 24, & 40) and PCMS (TA 7)	DPT19-019	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a	4/11/2019	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>Task 13-504 (TA 7 - PCMS): Section 106 consultation was completed in February 2012 as part of NEPA project number 2012-113. There was no change to project scope or location.</p> <p>Task 19-103 (TA 40 - Fort Carson) and Task 19-109 (TA 24 - Fort Carson): Section 106 consultation was completed in August 2019. See Table 2 below.</p> <p>TA 19-107 (TA 21 - Fort Carson): Undertaking has been previously reviewed under NEPA project number 2018-311.</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-220 615th Engineer Company Excavation Training Request, TA 43, Fort Carson	n/a	Downrange Fort Carson	FC C	4/15/2019	
2019-221 1st Stryker Brigade Combat Team Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	4/17/2019	
2019-222 994th Vertical Construction Company Excavation Training Request, TA 17, Fort Carson	n/a	Downrange Fort Carson	FC C	4/22/2019	
2019-237 Reseeding Project, TAs 20, 30, 31, 40, 43, & 53	DPT19-022	Downrange Fort Carson	FC D2b	5/6/2019	Perform reseeding efforts with the approved seed mix in the training areas that have had high impacts from heavy and light maneuver training.
2019-239 United Launch Alliance Rocket Launch, Camp Red Devil	n/a	Downrange Fort Carson	FC A FC D2b FC D2c	5/6/2019	
2019-240 409th Vertical Construction Company Excavation Training Request, TA 17, Fort Carson	n/a	Downrange Fort Carson	FC C	5/7/2019	
2019-247 10th Chemical Company Excavation Training Request, TA 30, Fort Carson	n/a	Downrange Fort Carson	FC C	5/16/2019	
2019-248 Warm-Up Range Ride of the Pikes Peak Range Riders	n/a	Downrange Fort Carson	FC D2c	5/20/2019	Recreational event
2019-257 Small Arms Ammunition Disposal Training, Range 121B	n/a	Downrange Fort Carson	FC A	5/30/2019	Use of existing permitted ammunition disposal site on Range 121B to conduct the ammunition disposal training

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-259 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	DPT18-032	Bird Farm Recreation Area Turkey Creek Complex Wildlife Demonstration Area Downrange Fort Carson PCMS Numbered TAs	FC D2b PC B4b2	6/4/2019	2019-259 is an updated NEPA review. Several of the proposed locations were also reviewed as part of the FY18 Prescribed Fire and Wildlands Reduction Plan (NEPA 2018-001, 2018-004, 2018-119, & 2018-205). Information provided to proponent for avoidance of protected cultural resources. Section 106 consultation is ongoing for the portions within Bird Farm Recreation Area, Turkey Creek Complex, and Wildlife Demonstration Area. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA. Undertaking has been previously reviewed under NEPA project number 2018-333.
2019-270 4th Brigade Support Battalion Excavation Training Request, TA 50, Fort Carson	n/a	Downrange Fort Carson	FC C	6/13/2019	
2019-272 Road Repair, Route 1	DPW19-006	Downrange Fort Carson	FC D1	6/17/2019	Repair damaged asphalt along Route 1 using mill and overlay method unless full depth repair is needed. Also millings will be added to shoulders where shoulder leveling is required.
2019-276 299th Brigade Engineer Battalion Excavation Training Request, TAs 28, 30, 40, & 43, Fort Carson	n/a	Downrange Fort Carson	FC C	6/20/2019	
2019-281 4th Brigade Support Battalion Excavation Training Request, TA 50, Fort Carson	n/a	Downrange Fort Carson	FC C	6/25/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-282 2/160th Airborne Fuel Operations Training Exercise , Fort Carson (Training Event Cancelled)	n/a	Downrange Fort Carson	FC B	6/26/2019	The exercise would include dropping 12 jumpers and 1 each 32-foot type V platform containing 7 fuel blivets from a C-130 into a designated drop zone. Training event was cancelled.
2019-284 Semi-Autonomous Vehicle Testing, Route 1	n/a	Downrange Fort Carson	FC B	6/27/2019	
2019-293 Renovate Range 117, Fort Carson	DPT19-025	Downrange Fort Carson	FC D1a	7/3/2019	A heavy weapon range, small arms range, pistol range, and a sniper tower will be constructed within the existing range footprint of Range 117.
2019-294 68th Combat Sustainment Support Battalion Excavation Training Request, TA 15, Fort Carson	n/a	Downrange Fort Carson	FC C	7/3/2019	
2019-295 2-77 Field Artillery Excavation Training Request, TA 20, Fort Carson	n/a	Downrange Fort Carson	FC C	7/3/2019	
2019-297 569th Engineer Company Excavation Training Request, TA 9 & 16, Fort Carson	n/a	Downrange Fort Carson	FC C	7/10/2019	
2019-299 244th Engineer Company Excavation Training Request, TA 40, Fort Carson	n/a	Downrange Fort Carson	FC C	7/11/2019	
2019-306 52nd Brigade Engineer Battalion Excavation Training Request, TA 7, Fort Carson	n/a	Downrange Fort Carson	FC C	7/16/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-315 244th Engineer Company Excavation Training Request, TAs 41 & 43, Fort Carson	n/a	Downrange Fort Carson	FC C	7/18/2019	
2019-316 994th Vertical Construction Company Excavation Training Request, TA 41, Fort Carson	n/a	Downrange Fort Carson	FC C	7/18/2019	
2019-319 4th Sustainment Brigade Excavation Training Request, TA 31, Fort Carson	n/a	Downrange Fort Carson	FC C	7/25/2019	
2019-320 68th Combat Sustainment Support Brigade Excavation Training Request, TA 39, Fort Carson	n/a	Downrange Fort Carson	FC C	7/31/2019	
2019-326 4th Sustainment Brigade Excavation Training Request, TA 31, Fort Carson	n/a	Downrange Fort Carson	FC C	8/7/2019	
2019-327 409th Vertical Construction Company Excavation Training Request, TA 41, Fort Carson	n/a	Downrange Fort Carson	FC C	8/7/2019	
2019-332 615th Engineer Company Excavation Training Request, TAs 41 & 51, Fort Carson	n/a	Downrange Fort Carson	FC C	8/14/2019	
2019-338 569th Engineer Company (MAC) Excavation Training Request, TAs 5, 9, & 10, Fort Carson	n/a	Downrange Fort Carson	FC C	8/19/2019	
2019-341 2nd Infantry Brigade Combat Team Excavation Training Request, TAs 10, 16, 17, 20, 24, 28, 29, 40, & 41, Fort Carson	n/a	Downrange Fort Carson	FC C	8/21/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-342 299th Brigade Engineer Battalion Excavation Training Request, TA 5, Fort Carson	n/a	Downrange Fort Carson	FC C	8/21/2019	
2019-343 299th Brigade Engineer Battalion Excavation Training Request, TA 43, Fort Carson	n/a	Downrange Fort Carson	FC C	8/21/2019	
2019-347 2nd Infantry Brigade Combat Team "Warhorse Strike" Training Exercise, Fort Carson	n/a	Downrange Fort Carson	FC A FC B FC C	8/23/2019	
2019-350 299th Brigade Engineer Battalion Excavation Training Request, TA 16, Fort Carson	n/a	Downrange Fort Carson	FC C	8/27/2019	
2019-351 4th Engineer Battalion Excavation Training Request, TA 12, Fort Carson	n/a	Downrange Fort Carson	FC C	8/28/2019	
2019-357 615th Engineer Company Excavation Training Request, TA 7, Fort Carson	n/a	Downrange Fort Carson	FC C	9/5/2019	
2019-358 299th Brigade Engineer Battalion Excavation Training Request, TAs 41, 42, & 43, Fort Carson	n/a	Downrange Fort Carson	FC C	9/5/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-371 Vegetation Removal along Installation Perimeter Firebreak, Fort Carson	DPW19-098	Turkey Creek Complex Downrange Fort Carson	FC D2b	9/17/2019	Mastication of small trees and shrubs. Felling and removal of larger trees, and mastication of slash. Proposed project locations are within TAs 20, 24, 25, 28, 41, 42, 48, 50, 51, and 56, as wells as Turkey Creek Complex. Section 106 consultation is required for the portion within Turkey Creek Complex (see Enclosure 1, Table 2 of the FY19 Annual Report for the Fort Carson Built Environment PA).
2019-372 Tree Thinning (Wildland Fuel Mitigation Purposes), TA 27, Fort Carson	DPW19-103	Downrange Fort Carson	FC D2b	9/17/2019	
2019-377 299th Brigade Engineer Battalion Excavation Training Request, TA 9, Fort Carson	n/a	Downrange Fort Carson	FC C	9/19/2019	
2019-378 1st Space Battalion Excavation Training Request, TA 11, Fort Carson	n/a	Downrange Fort Carson	FC C	9/23/2019	
CF2019-005 2-77 Field Artillery Excavation Training Request, TA 14, Fort Carson	n/a	Downrange Fort Carson	FC C	10/15/2018	
CF2019-007 4th Brigade Support Battalion Excavation Training Request, TA 50, Fort Carson	n/a	Downrange Fort Carson	FC C	10/25/2018	
CF2019-008 438th Medical Detachment (Veterinary Service Support) Excavation Training Request, TA 16, Fort Carson	n/a	Downrange Fort Carson	FC C	10/29/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
CF2019-009 4th Engineer Battalion Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	10/31/2018	

Table 2. Non-Exempted Undertakings Requiring Section 106 Consultation

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-003 Construction and Operation of Infantry Platoon Battle Course (IPBC) at Range 127 and Expansion of Range 153 for Infantry Squad Battle Course (ISBC)	PN 72176	Downrange Fort Carson	10/1/2018	CHS #68021 4/30/2015 (Range 127 IPBC) CHS #68295 10/8/2015 (Range 153 ISBC)	No adverse effects to historic properties (Range 127 IPBC) 2019-003 is an updated NEPA review of the undertaking, as the project has not been initiated within six months since last reviewed. Undertaking have been previously reviewed under NEPA project numbers 2014-115, 2014-355, 2015-248, 2015-410, 2016-276, 2017-187, 2017-321, 2017-355, and 2018-018.
2019-134 Remove Diversion Berm above Quarry Pond, Stone City	DPW19-059	Downrange Fort Carson	1/25/2019		Section 106 consultation has not been initiated.
2019-163 Install Three-Phase Electrical Power to Range 123, Fort Carson	RES16-005	Downrange Fort Carson	2/20/2019	HC #75708 3/21/2019	No adverse effects to historic properties. Section 106 consultation on revised project scope and location was completed in April 2019. Project scope and location has changed again. Section 106 consultation has not been initiated on revised project scope. Undertaking had been previously reviewed under NEPA project number 2017-077.
2019-204 Black Hills Energy's Southern Colorado Reliability Upgrade Project, Fremont and Pueblo Counties, Colorado	n/a	Downrange Fort Carson	4/20/2019		Section 106 consultation is in progress. Undertaking review packet was sent to SHPO, Native American Tribes, and consulting and other parties on 10/23/2019.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-211 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 21, 24, & 40) and PCMS (TA 7)	DPT19-019	Downrange Fort Carson PCMS Numbered TAs	4/11/2019	CHS #61255 2/17/2012 (Task 13-504) HC #76367 8/8/2019 (Task 19-103 & Task 19-109)	No historic properties affected Task 13-504 (TA 7 - PCMS): Section 106 consultation was completed in February 2012 as part of NEPA project number 2012-113. There was no change to project scope or location. See Enclosure 1, Table 2 within the FY19 Annual Report for the PCMS PA. Task 19-103 (TA 40 - Fort Carson) and Task 19-109 (TA 24 - Fort Carson): Section 106 consultation was completed in August 2019. TA 19-107 (TA 21 - Fort Carson): Undertaking has been previously reviewed under NEPA project number 2018-311.
2019-321 Operation of the MQ-1C Gray Eagle or Similar Unmanned Aerial System in National Airspace	n/a	Downrange Fort Carson PCMS-wide	8/1/2019	HC #76656 10/17/2019	No adverse effects to historic properties Section 106 consultation is in progress. Colorado Council of Professional Archaeologists, Not 1 More Acre!, and Otero County Board of Commissioners have expressed concerns about the proposed undertaking.

Table 3. Other Non-Exempted Undertakings

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2019-127 City of Fountain Powerline, Easement Renewal	n/a	Main Post Downrange Fort Carson	1/17/2019	Renew an existing easement for a period of 25 years to the City of Fountain for powerline that crosses Fort Carson. No potential to effect historic properties
2019-345 Annual Review of the Implementation of the FY2017-2021 Fort Carson Integrated Cultural Resources Management Plan	n/a	n/a	8/21/2019	Document Review
2019-359 Integrated Natural Resources Management Plan (INRMP) 2019-2024	n/a	n/a	9/2/2019	Document Review

ENCLOSURE 2:
FORT CARSON DOWNRANGE PA TASK TRACKER
(CURRENT AS OF SEPTEMBER 30, 2019)

Stipulation	Action	Duration	Date Required	Remarks
I.A.1	GIS shapefiles and master index provided to SHPO	60 days after signing	5/29/2014	Completed; provide updates as necessary
I.A.1	Cultural resources documentation submitted to SHPO	60 days after signing	5/29/2014	Completed; provide updates as necessary
I.A.2	SHPO notifies USAG that information baseline has been created and requests any missing information	1 year after completion of I.A.1	5/30/2015	Completed
I.A.3	USAG and SHPO consult to address any data discrepancies	180 days after completion of I.A.2	4/6/2015	Completed (HC #63877); consult as needed on any data discrepancies that may arise
I.A.3	Implement agreeable terms to reconcile discrepancies	3 years after completion of I.A.3 task above	4/6/2015	Completed (HC #63877)
I.B	Complete survey of 3,438 acres	3 years after signing	3/30/2017	Completed
I.B	Submit complete survey report	60 days after completion of survey	5/4/2017	Completed
I.B.1	SHPO concurrence with NRHP eligibility determinations from survey report	60 days after submission of survey report	7/10/2017	Completed (HC #63877)

Stipulation	Action	Duration	Date Required	Remarks
I.C	Complete documentation on needs data sites or implement a protection measure	3 years after signing	03/30/2017	<p>Completed</p> <p>FY19: No re-evaluations scheduled</p> <p>FY20: Contract awarded in Sep 2019 to draft research designs for the evaluation of 21 sites and the documentation of 11 isolated finds to modern-day standards.</p> <p>21 sites have determined "needs data," with which SHPO concurs. Research designs are being drafted for these sites in FY20.</p> <p>The SHPO disagrees with the USAG's determination of eligibility for 11 isolated finds. USAG has agreed to document these resources to modern-day standards. This documentation will be completed in FY20.</p> <p>The SHPO disagrees with the USAG's determination of eligibility for 28 sites. USAG is drafting a response to address the SHPO's concerns.</p> <p>Protection strategies have been implemented at these sites.</p>
I.C.1	SHPO concurrence with NRHP eligibility determinations from re-evaluations	60 days after submission	TBD	
I.D	Continue consultation with Tribes concerning site protection, monitoring frequencies, and TCPs and sacred sites identification	Ongoing action	n/a	<p>Consultation meeting was held January 29-31, 2019, at PCMS. In attendance were representatives from the Cheyenne River Sioux, Comanche Nation, Jicarilla Apache Nation, Northern Arapaho Tribe, Rosebud Sioux Tribe, Southern Ute Tribe, and Standing Rock Sioux.</p>
III.B	Implement site protection measures	3 years after signing	03/30/2017	<p>77 of 196 protected sites have a protection fence, Seibert markers, or combination; 66 have corner markers only; all others are administratively protected.</p>
III.C	Propose amended site protection measures and monitoring frequencies	As needed	n/a	<p>No proposed changes during reporting period</p>

Stipulation	Action	Duration	Date Required	Remarks
III.E	Provide training vehicles/aircraft with means of knowing site locations	3 years after signing	03/30/2017	Completed; update as necessary.
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections. FY19: Contract awarded in April 2019 to assist with monitoring activities.
VI.A	Implement cultural awareness training of all personnel involved in the execution of undertakings	Annually	n/a	Cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians, and contractors.
VI.B	Offsetting mitigation: Native American Ethnographic Oral History Project	Initiate within 3 years of signing	03/30/2017	Contract was awarded in September 2019 for the completion of traditional use study of the Hogback at Piñon Canyon Maneuver Site.
VI.B	Offsetting mitigation: Archaeological Context Project	Initiate within 3 years of signing	03/30/2017	An Advisory Committee meeting was held on 09/09/2019 to discuss Phase II of the project. Next meeting is scheduled for 11/20/2019.
VI.B	Offsetting mitigation: Santa Fe Trail Community Outreach Project	Initiate within 3 years of signing	03/30/2017	Awaiting formal proposal from Bent's Old Fort Chapter of the Santa Fe Trail Association for the Advisory Committee to review.
VI.B.2	Organize an advisory committee		03/30/2016	Last meeting was held on 09/09/2019. Next meeting is scheduled for 11/20/2019.
VII.G	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017

ENCLOSURE 3:
SHPO CORRESPONDENCE ON FY18 ANNUAL REPORT



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

Carlos Rivero-deAguilar
Chief, Environmental Division
US Army Installation Management Command
Directorate of Public Works
1626 Evans Street, BLDG 1219
Fort Carson, CO 80913-4143

NOV 29 2018

Re: Fiscal Year (FY) 2018 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear Mr. Rivero-deAguilar:

Thank you for your emailed correspondence dated November 4, 2018 and received by our office the same day regarding review of the Fiscal Year 2018 Annual Reports provided to fulfill:

- Stipulation VII of the *Programmatic Agreement among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Construction, Maintenance, and Operations Activities for Areas on Fort Carson, Colorado, and*
- Stipulation V of the *Programmatic Agreement among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Military Training and Operational Support Activities at Down Range Fort Carson, Colorado, and*
- Stipulation VI of the *Programmatic Agreement Among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Military Training and Operational Support Activities at Pinon Canyon Maneuver Site, Fort Carson, Colorado.*

After review of the documentation provided, we feel it is appropriate to convey our comments in two formats. For comments to specific portions of the Annual Reports, see the appropriate attachment (Attachment 1—Built Environment, Attachment 2—Down Range Fort Carson, Attachment 3—Pinon Canyon). Below, we describe two general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Our first general comment is that many of the stipulations within these three Programmatic Agreements (PAs) call for continued action and/or maintenance, and we suggest that USAG Fort Carson renew efforts in these areas. One area where we note that renewed efforts could be profitable is the Cultural Awareness Training. While the Cultural Awareness Training program, including the PowerPoint presentations, is useful, we suggest that to comply with the PAs, USAG Fort Carson should periodically assess how these trainings are directly affecting cultural resources. How has the number of inadvertent entries to sites changed since the current program was created? Are there fewer impacts to sites or has there been no change to the impacts? We suggest that while there are many factors that contribute to negative impacts to individual sites, when looking at quantitative information regarding sites entered at Pinon Canyon Maneuver Site (PCMS), there is little to suggest that the current Cultural Awareness Program is decreasing the number of sites impacted by brigade trainings. During the 2010 training, 39 sites were entered, 22 sites were entered in 2013, 48 sites were entered in 2015, 45 sites were entered in 2017, and to



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

date, our office has been notified of entry into 65 sites during 2018. This quantitative data suggests that the current program should be amended and adjusted. The current program is aimed at particular soldiers at the unit level (Environmental Protection Officers), but we suggest that all command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis to emphasize that, although they may be in command of the training exercise, they must also require their troops to comply with regulations and laws to protect cultural resources. We feel that if education and compliance is emphasized for both high and low ranking soldiers, these measures may be more effective.

A second area where we believe renewed efforts will be beneficial is in completing documentation of the cultural resources managed by USAG Fort Carson. At Down Range Fort Carson (DRFC), the PA task tracker lists 23 sites that have not been fully documented. We suggest prioritizing documentation of these sites and sites at PCMS as well as the various mitigation projects agreed to in the DRFC PA, including the Native American Ethnographic Oral History Project, the Archaeological Context Project, and the Santa Fe Trail Community Outreach Project. We suggest that completing the re-assessment of the Turkey Creek Rock Art District (HC#72565) should also be prioritized in order to better protect the important cultural resources within DRFC. Our office requested in a letter dated August 20, 2018 (HC#72565) that USAG Fort Carson determine how the district will be defined and managed in the future prior to providing comment on the 24 sites within Turkey Creek which could contribute to the district under one or more of the proposed definitions and urge USAG Fort Carson to renew efforts to refine the district definition.

Our second general comment concerns the training exercises conducted by USAG Fort Carson. While many of the activities associated with training exercises were categorized as exempted activities within the PAs, we suggest that military use of the landscape has the potential to adversely affect historic properties. As such, our office suggests that while the minimization measures used to date should be continued, mitigation of adverse effects should also begin. We request that USAG Fort Carson initiate consultation to mitigate the direct, indirect, and cumulative adverse effects of military use of DRFC and PCMS.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us, Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or jason.obrien@state.co.us, or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



Attachment 2:

SHPO Comments on FY2018 Down Range Fort Carson PA Annual Report (HC#63877)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2018-264, 291: Our office looks forward to continued consultation on these undertakings.

III. Action Updates

A. Status of Tasks Implemented under Stipulations I, III, IV, and VI

I.C: As detailed in the updated Appendix 2 (Enclosure 5), updated eligibility determinations for 34 sites associated with the Turkey Creek Rock Art District (5PE.14) were received by our office on November 13, 2017. We concurred that seven of these sites are individually eligible for the National Register of Historic Places (NRHP) and contribute to the Turkey Creek Rock Art District. We requested that USAG Fort Carson determine how the district will be defined and managed in the future prior to providing comment on the additional 24 sites. We feel that of the three options put forward by Loendorf et al. (2017:9.3), Approach 2 is the preferred option and that many sites that may not be individually eligible for the NRHP may still contribute to the district if it is defined as the rock art and non-rock art sites along the Turkey Creek drainage.

I.C.1: Our office requested additional information on several of the sites in question that were re-evaluated during FY16.

III.E: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to the equipment, and the fact that not all training vehicles/aircraft are provided with digital or hard copy maps that contain site locations means that the current method demonstrates that progress is being made to fulfill this stipulation, but that additional work is needed.

B. Cultural Resource Awareness Training

While we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still work to be done. What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis to emphasize that, although they may be in command of the training exercise, they must also require their troops to comply with regulations and laws to protect cultural resources. We feel that if education is emphasized for both high and low ranking soldiers, these measures may be more effective.



C. Inadvertent Entries and/or Impacts to Historic Properties

We view the placement of six portable latrines within the boundary of a protected resource as an example of the disconnect between individuals at various command levels, reinforcing the need for all soldiers to receive regular, repeated cultural resource training. This should include training in various mediums and methods as well, as learning styles vary dramatically among individuals.

D. Inadvertent Discoveries

No comments.

E. Emergency Response

We look forward to the opportunity to review and comment on the after action report for the Orchard Canyon Wildland Fire.

F. Amendment

See comment III.A.I.C above.

G. Dispute Resolution

No comments.

ENCLOSURE 4:
WILDLAND FIRES WITHIN THE FORT CARSON DOWNRANGE PA'S
AREA OF POTENTIAL EFFECTS

Incident Number	Location	Start Date	End Date	Acres	Comment
2019-222	Range 115B	1/29/2019	1/29/2019	0.1	No historic properties are located within wildland fire footprint.
2019-334	Range 121C	2/12/2019	2/12/2019	0.5	No historic properties are located within wildland fire footprint.
2019-466	Range 105	2/26/2019	2/26/2019	0.1	No historic properties are located within wildland fire footprint.
2019-569	Range 115B	3/6/2019	3/6/2019	3	No historic properties are located within wildland fire footprint.
2019-587	Range 115B	3/7/2019	3/7/2019	32	No historic properties are located within wildland fire footprint.
2019-588	Range 115B	3/7/3019	3/7/2019	3	No historic properties are located within wildland fire footprint.
2019-601	Range 115B	3/8/2019	3/8/2019	673	No historic properties are located within wildland fire footprint.
2019-703	Range 115B	3/18/2019	3/18/2019	258	No historic properties are located within wildland fire footprint.
2019-733	Range 115B	3/20/2019	3/20/2019	20	No historic properties are located within wildland fire footprint.
2019-734	Range 115B	3/20/2019	3/20/2019	20	No historic properties are located within wildland fire footprint.
2019-835	Range 115B	4/4/2019	4/4/2019	7	No historic properties are located within wildland fire footprint.
2019-887	Range 109	4/10/2019	4/10/2019	0.5	No historic properties are located within wildland fire footprint.
2019-1329	Range 143	6/3/2019	6/3/2019	1	No historic properties are located within wildland fire footprint.
2019-1340	Range 139	6/4/2019	6/4/2019	0.01	No historic properties are located within wildland fire footprint.
2019-1342	Range 133	6/4/2019	6/4/2019	0.01	No historic properties are located within wildland fire footprint.

Incident Number	Location	Start Date	End Date	Acres	Comment
2019-1349	Range 153	6/4/2019	6/4/2019	0.5	No historic properties are located within wildland fire footprint.
2019-1356	Range 133	6/5/2019	6/5/2019	0.25	No historic properties are located within wildland fire footprint.
2019-1368	Large Artillery Impact Area	6/6/2019	6/6/2019	0.1	No historic properties are located within wildland fire footprint.
2019-1388	Range 115B	6/8/2019	6/8/2019	0.1	No historic properties are located within wildland fire footprint.
2019-1394	Range 115B	6/9/2019	6/9/2019	0.1	No historic properties are located within wildland fire footprint.
2019-1434	Training Area 6	6/14/2019	6/4/2019	5	No historic properties are located within wildland fire footprint.
2019-1579	Training Area 26	6/29/2019	6/29/2019	23	No historic properties are located within wildland fire footprint.
2019-1581	Training Area 10	6/29/2019	6/29/2019	3.2	No historic properties are located within wildland fire footprint.
2019-1621	Training Area 45	7/4/2019	7/9/2019	33	The wildland fire occurred within the extreme north-central portion of site 5EP793, Stone City. Archaeologists from Sol Solutions conducted an after action inspection of the area. No features that contribute to the site's significance were adversely impacted by the fire, which was ignited by a lightning strike, nor associated fire suppression activities. An after action report is being prepared, and will be submitted to the SHPO, Native American Tribes, and other consulting and interested parties.
2019-1671	Range 143	7/9/2019	7/9/2019	2	No historic properties are located within wildland fire footprint.
2019-1674	Range 141A	7/9/2019	7/9/2019	35	No historic properties are located within wildland fire footprint.
2019-1687	Range 127A	7/10/2019	7/10/2019	0.1	No historic properties are located within wildland fire footprint.
2019-1694	Range 143	7/11/2019	7/11/2019	0.25	No historic properties are located within wildland fire footprint.

Incident Number	Location	Start Date	End Date	Acres	Comment
2019-1716	Range 143	7/13/2019	7/13/2019	10.8	No historic properties are located within wildland fire footprint.
2019-1774	Range 143	7/18/2019	7/18/2019	0.1	No historic properties are located within wildland fire footprint.
2019-1787	Range 139	7/19/2019	7/19/2019	60	No historic properties are located within wildland fire footprint.
2019-1796	Training Area 11	7/20/2019	7/20/2019	58	No historic properties are located within wildland fire footprint.
2019-1933	Range 104	8/2/2019	8/2/2019	1	No historic properties are located within wildland fire footprint.
2019-1966	Range 123	8/6/2019	8/6/2019	0.5	No historic properties are located within wildland fire footprint.
2019-2044	Training Area 41	8/13/2019	8/14/2019	1	No historic properties are located within wildland fire footprint.
2019-2072	Training Area 16	8/16/2019	8/16/2019	0.1	No historic properties are located within wildland fire footprint.
2019-2290	Range 131B	9/12/2019	9/13/2019	44	Site 5EP6180, a prehistoric open camp site, is located within the wildland fire footprint. Due to the presence of unexploded ordnance, an after action inspection of this site was not authorized.
2019-2369	Range 143	9/19/2019	9/19/2019	0.1	No historic properties are located within wildland fire footprint.

FISCAL YEAR (FY) 2019 ANNUAL REPORT:
PROGRAMMATIC AGREEMENT AMONG U.S. ARMY GARRISON FORT CARSON, COLORADO
STATE HISTORIC PRESERVATION OFFICER, AND THE ADVISORY COUNCIL ON HISTORIC
PRESERVATION REGARDING MILITARY TRAINING AND OPERATIONAL SUPPORT ACTIVITIES AT
PIÑON CANYON MANEUVER SITE, FORT CARSON, COLORADO

NOVEMBER 15, 2019

The U.S. Army Garrison (USAG) Fort Carson submits the following annual report to the State Historic Preservation Officer (SHPO) and concurring parties in accordance with Stipulation VI of the *Programmatic Agreement among U.S. Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado*, hereafter referred to as the PCMS PA. This report covers the period from October 1, 2018, through September 30, 2019, and includes information as outlined in Stipulation VI.A. It has been distributed electronically to the SHPO and concurring parties and is available online at: <http://www.carson.army.mil/organizations/dpw.html>.

I. Exempted Undertakings

Table 1 of Enclosure 1 lists all exempted undertakings that have been reviewed by the Fort Carson Cultural Resources Manager (CRM) between October 1, 2018, and September 30, 2019. Eighteen undertakings were reviewed that were considered exempted in accordance with Appendix 1 of the PCMS PA.

II. Non-Exempted Undertakings

Table 2 of Enclosure 1 lists all undertakings that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA). Three undertakings required Section 106 consultation. Section 106 consultation has been completed for one undertaking (2019-211), is ongoing for one undertaking (2019-321), and has not been initiated for the other project (2019-285).

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRM. These three undertakings were document reviews.

III. Action Updates

A. Status of Tasks Implemented under Stipulations I, III, and IV

The PCMS PA Task Tracker (Enclosure 2) provides detailed information regarding the status of various tasks implemented under Stipulation I, Inventory and Evaluation of Cultural Resources; Stipulation III, Protection of Cultural Resources; and Stipulation IV, Monitoring and Inspection.

B. Cultural Resources Awareness Training

The following cultural resources awareness training materials are provided to Soldiers, civilian employees, contractors, and other users, as appropriate:

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated August 2017
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; available online at: <http://www.carson.army.mil/organizations/dpw.html>
- Cultural Resources Awareness Video – available online at: <http://www.carson.army.mil/organizations/dpw.html#three>

Additional training materials, briefs, and presentations are provided on an as-needed basis, and are typically specific to the situation.

In correspondence dated November 29, 2018 (HC #58731, HC #63877, and HC #65747), the SHPO requested USAG Fort Carson to assess how the cultural resources awareness training materials directly affect the number of inadvertent entries into protected resources. The SHPO further stated the current training program does not appear to be effective in decreasing the number of sites impacted by brigade training exercises based on the increased number of entries noted during after action inspections. Enclosure 3 includes their correspondence. USAG Fort Carson has assessed its cultural resources awareness training program, and is currently drafting a response to address the SHPO's concerns. This response will be sent to the SHPO by late December 2019.

Comments concerning the adequacy of the training materials were received from Not 1 More Acre! via correspondence dated December 14, 2018. Enclosure 4 includes their correspondence, as well as the USAG Fort Carson's response to those comments.

C. Brigade Training Exercises

No brigade training exercises occurred at the PCMS during the reporting period. The 4th Combat Aviation Brigade (4CAB) is planning a training exercise that will take place at Fort Carson and PCMS, and is tentatively scheduled for March 2020.

D. Inadvertent Entries and/or Impacts to Historic Properties

During the reporting period, inadvertent entries and/or impacts to historic properties were documented at two sites: 5LA5235 and 5LA10010. During the Annual Native American Consultation site visit to 5LA5235 on January 30, 2019, three light-duty trucks entered the northern part of the site following an old two-track road that in the past had been used to access the site. The vehicles exited along the same trail. The entry resulted in matted vegetation to light impressions (less than 2 cm in depth). Seibert markers have been installed to fully enclose the northern boundary of the site, and standard North Atlantic Treaty Organization (NATO) route markers were placed along the authorized travel corridor adjacent to the site to keep vehicles from leaving the road. A Memorandum for

Record and supporting documentation was submitted to the SHPO on October 2, 2019. Via correspondence dated October 21, 2019 (HC #76682), the SHPO concurred with the finding of no adverse effects to a historic property.

On March 26, 2019, a Conservation Law Enforcement Officer observed evidence of an inadvertent entry at site 5LA10010 during a routine inspection of the site, and reported this entry to the Cultural Resources Manager on March 27, 2019. The SHPO was notified via email on April 5, 2019. One set of tracks belonging to a narrow-based, wheeled vehicle drove across the northern quarter of the site. The entry resulted in matted vegetation only. No cultural materials nor cultural features were observed in the tracks. A Memorandum for Record and supporting documentation was submitted to the SHPO on October 2, 2019. Via correspondence dated October 21, 2019 (HC #76682), the SHPO concurred with the finding of no adverse effects to a historic property.

E. Inadvertent Discoveries

There were no inadvertent discoveries during the reporting period.

F. Emergency Response per 36 CFR 800.12

Per 36 CFR 800.12(d), fire suppression activities associated with the following wildland fire events are considered immediate rescue and salvage operations conducted to preserve life or property, and as such, are exempt from the provisions of Section 106.

- Incident #2019-1614: The wildland fire started on July 3, 2019, with fire suppression activities concluding on the same day. Approximately 0.1 acres along Main Supply Route 1 were impacted. There are no historic properties within the wildland fire footprint.
- Incident #2019-2063: The wildland fire started on August 18, 2019, with fire suppression activities concluding on the same day. Approximately three acres within Training Area G were impacted. There are no historic properties within the wildland fire footprint.

G. Amendment

There were no amendments proposed nor executed during the reporting period.

H. Dispute Resolution

Not 1 More Acre! has expressed concerns regarding the implementation of the PCMS PA. Enclosure 4 includes their correspondence and the USAG Fort Carson's responses.

I. Other

Section 106 consultation on the 2010 2-4 Brigade Combat Team (BCT) “Warhorse Rampage” Training Exercise, the 2013 2-4 BCT “Warhorse Charge” Training Exercise, the 2015 1SBCT “Raider Focus I” Training Exercise, and 2017 1SBCT “Raider Focus II” Training Exercise is ongoing. Of the 153 sites entered during one (or more) of these past four exercises, USAG Fort Carson lacks concurrence from the SHPO on findings of effects for only 16 of these sites. There has been no correspondence during the reporting period concerning these consultation efforts.

Section 106 consultation for the 2018 3rd Armored Brigade Combat Team (3ABCT) “Iron Strike” Training Exercise is ongoing. The After Action Report was sent to the SHPO, Native American Tribes, and other consulting and interested parties on January 15, 2019. Fifty-five protected resources were entered. USAG Fort Carson determined adverse effects (direct, indirect, or cumulative) occurred at 10 of the resources. Finding of effect has been withheld at five protected resources until more data is gathered. Enclosure 5 includes correspondence from the SHPO and Not 1 More Acre! received during the reporting period concerning these consultation efforts.

Report compiled by:

Jennifer R. Kolise
Cultural Resources Manager

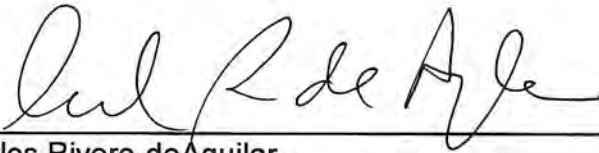
Approved by:



Wayne Thomas
Chief, NEPA and Cultural Management Branch

12 Nov 2019

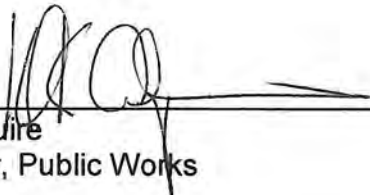
Date



Carlos Rivero-deAguilar
Chief, Environmental Division

13 Nov 2019

Date



Hal Alguire
Director, Public Works

14 Nov 2019

Date

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ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY19 REPORTING PERIOD (OCTOBER 1, 2018, THROUGH SEPTEMBER 30, 2019) UNDER THE PCMS PA

Table 1. Exempted Undertakings

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-004 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/1/2018	<p>2019-004 is an updated NEPA review of the FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS, as it has been over six months since last reviewed and portions of the project had not been initiated.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in March 2018 for mechanical fuel reduction within the White Horse Saloon APE (see Enclosure 1, Table 2 of the FY18 Annual Report for the Fort Carson Built Environment PA).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, 2017-174, 2018-001, 2018-004, 2018-119, & 2018-205.</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-075, 2019-173, & 2019-288 Quarterly Record of Environmental Consideration (REC) for Training	DPT19QTR2 DPT19QTR3 DPT19QTR4	Main Post Downrange Fort Carson PCMS-wide	BE I. C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/26/2018 3/11/2019	Per Fort Carson Regulation 200-1, each quarter the Record of Environmental Consideration (REC) for training will be updated. This quarterly training REC covers use of established ranges, drop zones, landing zones, and other training facilities; maneuver training (mounted, dismounted, and aerial); excavation training; etc. It does not cover brigade-sized training exercises, which are reviewed separately. In addition, excavation training is reviewed by the Cultural Resources Program on a case-by-case basis. Updated GIS layers of protected resources restrictions, as well as Standard Operating Procedures (SOPs) and cultural resources awareness training briefs for Fort Carson and PCMS are provided to DPTMS for planning purposes.
2019-083 & 2019-156 Repair Range 9 Target Access Road, PCMS	PCM18-007	PCMS Numbered TAs	PC B4a2	12/6/2018 2/14/2019	2019-083 is an updated NEPA review, as it has been over six months since last reviewed and the project has not been initiated. 2019-156 is a change in project scope to include raising the road in areas and installing culverts as needed in the existing road. Undertaking has been previously reviewed under NEPA project number 2018-227.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-085 & 2019-235 Repair PCMS Runway	PCM18-008	PCMS Cantonment	PC A2b	12/10/2018 5/6/2019	2019-085 & 2019-235 are updated NEPA reviews, as it has been over six months since last reviewed and the project has not been initiated. Undertaking has been previously reviewed under NEPA project number 2018-232.
2019-120 & 2019-132 Construction, Operation, and Maintenance of a Contractor-owned, Contractor Operated (COCO) Fuel Facility at Piñon Canyon Maneuver Site	n/a	PCMS Cantonment	PC A2a PC A2c	1/14/2019	2019-120 is a review of the mitigations from the 2014 Environmental Assessment to ensure there are no new environmental concerns. 2019-132 is the review of the Environmental Condition of Property. Section 106 consultation was completed in September 2013 prior to the execution of the PCMS PA.
2019-147 Invasive Species Treatments, Fort Carson and PCMS	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	2/6/2019	The project is to eradicate invasive plant species using mechanical, biological, and/or approved chemical treatment on the identified areas at Fort Carson and PCMS. Information provided to proponent for avoidance of protected cultural resources.
2019-161 576th Engineer Company Dig Request, Training Area 7, PCMS	n/a	PCMS Numbered TAs	PC B3	2/20/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-179 Tamarisk Biocontrol Study	DPW18-083	Downrange Fort Carson PCMS Numbered TAs PCMS Training Area A (Hogback)	FC D2a FC D2b PC B4b1 PC B4b2 PC D3b1 PC D3b2	3/11/2019	Scientific study to assess the phenology of tamarisk and biocontrol agent, tamarisk leaf beetle, on Fort Carson and PCMS. Surveys will include specimen collection of tamarisk and tamarisk leaf beetles, as well as, time lapse photography of plants. Cameras will be mounted onto trees where available or t-post (or similar post) if necessary. Undertaking has been previously reviewed under NEPA project number 2018-228.
2019-203 Install Dryer Vent in Gym Area, Bldg 300	PCM19-002	PCMS Cantonment	PC A2a	4/4/2019	
2019-205 Integrated Training Area Management (ITAM) Projects at Fort Carson and PCMS	DPT16-028	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1	4/8/2019	In order to maintain sustainable training lands, the ITAM Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Undertaking has been previously reviewed under NEPA project 2016-459.
2019-206 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 24 and 25) and PCMS (TA 7)	DPT18-024	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1	4/8/2019	In order to maintain sustainable training lands, the ITAM Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Undertaking has been previously reviewed under NEPA project number 2018-306.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-207 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 20, 40, 42, & 55) and PCMS (TA 7)	DPT18-025	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	4/8/2019	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Undertaking has been previously reviewed under NEPA project number 2018-307.
2019-215 Sombrero Horse Ride Event, PCMS	GAR19-010	PCMS Numbered TAs	PC B4b3	4/16/2019	Recreational event
2019-226 25-Year Easement Renewal for the Colorado Interstate Gas Company Natural Gas Pipeline, PCMS	n/a	PCMS Numbered TAs	PC B4a2	4/15/2019	
2019-253 Installation of Flood Monitors	n/a	PCMS Numbered TAs	PC B4b1	5/23/2019	Installation of pressure transducers by the U.S. Geological Survey in West Bear Springs and Bent Creek.
2019-255 Construct Platform for Storage Shed & Remove Existing Storage Shed	DPT19-029	PCMS Numbered TAs	PC B4a1 PC B4a4	5/29/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2019-259 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	DPT18-032	Bird Farm Recreation Area Turkey Creek Complex Wildlife Demonstration Area Downrange Fort Carson PCMS Numbered TAs	FC D2b PC B4b2	6/4/2019	2019-259 is an updated NEPA review. Several of the proposed locations were also reviewed as part of the FY18 Prescribed Fire and Wildlands Reduction Plan (NEPA 2018-001, 2018-004, 2018-119, & 2018-205). Information provided to proponent for avoidance of protected cultural resources. Section 106 consultation is ongoing for the portions within Bird Farm Recreation Area, Turkey Creek Complex, and Wildlife Demonstration Area (see Enclosure 1, Table 2 of the Fort Carson Built Environment PA). Undertaking has been previously reviewed under NEPA project number 2018-333.
2019-366 Testing of a Smoke Obscuration Module, PCMS	n/a	PCMS Numbered TAs PCMS Lettered TAs	PC B2 PC C1	9/11/2019	The purpose of the test is to collect data in support of the operational effectiveness and suitability of the smoke obscuration module.

Table 2. Non-Exempted Undertakings Requiring Section 106 Consultation

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-211 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 21, 24, & 40) and PCMS (TA 7)	DPT19-019	Fort Carson Downrange PCMS Numbered TAs	4/11/2019	CHS #61255 2/17/2012 (Task 13-504) HC #76367 8/8/2019 (Task 19-103 & Task 19-109)	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>Task 13-504 (TA 7 – PCMS): Section 106 consultation was completed in February 2012 as part of NEPA project number 2012-113. There was no change to project scope or location.</p> <p>Task 19-103 (TA 40 – Fort Carson) and Task 19-109 (TA 24 – Fort Carson): Section 106 consultation was completed in August 2019. See Enclosure 1, Table 2 of the FY19 Annual Report for the Fort Carson Downrange PA.</p> <p>TA 19-107 (TA 21 – Fort Carson): Undertaking has been previously reviewed under NEPA project number 2018-311.</p>
2019-285 Install Cellular Tower, PCMS	DIR17-019	PCMS Cantonment	6/27/2019		Section 106 consultation has not been initiated. The CRM is awaiting additional information from the project proponent.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2019-321 Operation of the MQ-1C Gray Eagle or Similar Unmanned Aerial System in National Airspace	n/a	Downrange Fort Carson PCMS-wide	8/1/2019	HC #76656 10/17/2019	No adverse effects to historic properties Section 106 consultation is in progress. Colorado Council of Professional Archaeologists, Not 1 More Acre!, and Otero County Board of Commissioners have expressed concerns about the proposed undertaking.

Table 3. Other Non-Exempted Undertakings

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2019-249 PCMS Area Development Plan	n/a	PCMS-wide	5/20/2019	Document Review
2019-345 Annual Review of the Integrated Cultural Resources Management Plan (ICRMP)	n/a	n/a	8/21/2019	Document Review
2019-359 Integrated Natural Resources Management Plan (INRMP) 2019-2024	n/a	n/a	9/2/2019	Document Review

**ENCLOSURE 2:
PCMS PA TASK TRACKER
(CURRENT AS OF SEPTEMBER 30, 2019)**

Stipulation	Action	Duration	Date Required	Remarks
I.A.1	GIS shapefiles and master site index provided to SHPO	90 days after signing	7/22/2014	Completed; provide updates as necessary
I.A.2	Cultural resources documentation submitted to SHPO	180 days after signing	10/20/2014	Completed; provide updates as necessary
I.A.3	SHPO notifies USAG that information baseline has been created and request any missing information	1 year after completion of I.A.2	4/02/2015	Completed
I.A.4	USAG and SHPO consult to address any data discrepancies	180 days after completion of I.A.3	7/05/2016	Completed (HC #63877); consult as needed on any data discrepancies that may arise.
I.A.4	Implement agreeable terms to reconcile discrepancies	3 years after completion of I.A.4 task above	7/05/2016	Completed (HC #63877).
I.B	Complete documentation on needs data sites or implement a protection measure	3 years after signing	04/22/2017	<p>Completed</p> <p>FY19: No re-evaluations scheduled. Contract awarded in September 2018 to develop research designs for 71 sites. Project is ongoing.</p> <p>FY20: Contract awarded in September 2019 to evaluate 58 isolated finds. Kick-off meeting held in October 2019. Contract awarded in September 2019 to conduct a traditional use study of the Hogback.</p> <p>567 resources have been determined "needs data," with which SHPO concurs. Research designs are being drafted for 71 of these sites located within the primary maneuver areas and along canyon rims. Documentation and evaluation to modern-day standards of an additional 58 of these resources (categorized as isolated finds) will be started in FY20.</p> <p>Protection strategies been implemented at these sites.</p>

Stipulation	Action	Duration	Date Required	Remarks
I.B.1	SHPO concurrence with NRHP eligibility determinations from re-evaluations	60 days after submission	TBD	
I.D	Continue consultation with Tribes concerning site protection, monitoring frequencies, and TCPs and sacred sites identification	Ongoing action	n/a	Consultation meeting was held January 29-31, 2019, at PCMS. In attendance were representatives from the Cheyenne River Sioux, Comanche Nation, Jicarilla Apache Nation, Northern Arapaho Tribe, Rosebud Sioux Tribe, Southern Ute Tribe, and Standing Rock Sioux.
III.A	Implement site protection measures		04/22/2017	255 of 1,200 protected sites have a protection fence, Seibert markers, boulders, or combination; 191 have corner markers only; 126 are terrain protected (i.e. no vehicle access); all others are administratively protected. FY20: The Integrated Training Area Management Program has awarded a contract to complete marking at all eligible sites within the primary maneuver area and along canyon rims.
III.B	Propose amended site protection measures and monitoring frequencies	As needed	n/a	No proposed changes during reporting period
III.D	Provide training vehicles/aircraft with means of knowing site locations	1 year after signing	04/22/2015	Completed; update as necessary
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections. FY19: Contract awarded in April 2019 to assist with monitoring activities.
V.A	Implement cultural awareness training of all personnel involved in the execution of undertakings	Annually	n/a	Cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians, and contractors.

Stipulation	Action	Duration	Date Required	Remarks
VI.C	Annual meeting with consulting parties	Annually	NLT Feb. 15 th	Consultation meeting was held on January 16, 2019, at Fort Carson. In attendance were representatives from the Colorado SHPO, Colorado Preservation, Inc., Colorado Council of Professional Archaeologists, Las Animas County Commissioners, and Otero County Commissioners.
VII.AG	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017

ENCLOSURE 3:
SHPO CORRESPONDENCE ON FY18 ANNUAL REPORT



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

Carlos Rivero-deAguilar
Chief, Environmental Division
US Army Installation Management Command
Directorate of Public Works
1626 Evans Street, BLDG 1219
Fort Carson, CO 80913-4143

NOV 29 2018

Re: Fiscal Year (FY) 2018 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear Mr. Rivero-deAguilar:

Thank you for your emailed correspondence dated November 4, 2018 and received by our office the same day regarding review of the Fiscal Year 2018 Annual Reports provided to fulfill:

- Stipulation VII of the *Programmatic Agreement among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Construction, Maintenance, and Operations Activities for Areas on Fort Carson, Colorado, and*
- Stipulation V of the *Programmatic Agreement among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Military Training and Operational Support Activities at Down Range Fort Carson, Colorado, and*
- Stipulation VI of the *Programmatic Agreement Among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Military Training and Operational Support Activities at Pinon Canyon Maneuver Site, Fort Carson, Colorado.*

After review of the documentation provided, we feel it is appropriate to convey our comments in two formats. For comments to specific portions of the Annual Reports, see the appropriate attachment (Attachment 1—Built Environment, Attachment 2—Down Range Fort Carson, Attachment 3—Pinon Canyon). Below, we describe two general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Our first general comment is that many of the stipulations within these three Programmatic Agreements (PAs) call for continued action and/or maintenance, and we suggest that USAG Fort Carson renew efforts in these areas. One area where we note that renewed efforts could be profitable is the Cultural Awareness Training. While the Cultural Awareness Training program, including the PowerPoint presentations, is useful, we suggest that to comply with the PAs, USAG Fort Carson should periodically assess how these trainings are directly affecting cultural resources. How has the number of inadvertent entries to sites changed since the current program was created? Are there fewer impacts to sites or has there been no change to the impacts? We suggest that while there are many factors that contribute to negative impacts to individual sites, when looking at quantitative information regarding sites entered at Pinon Canyon Maneuver Site (PCMS), there is little to suggest that the current Cultural Awareness Program is decreasing the number of sites impacted by brigade trainings. During the 2010 training, 39 sites were entered, 22 sites were entered in 2013, 48 sites were entered in 2015, 45 sites were entered in 2017, and to



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date, our office has been notified of entry into 65 sites during 2018. This quantitative data suggests that the current program should be amended and adjusted. The current program is aimed at particular soldiers at the unit level (Environmental Protection Officers), but we suggest that all command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis to emphasize that, although they may be in command of the training exercise, they must also require their troops to comply with regulations and laws to protect cultural resources. We feel that if education and compliance is emphasized for both high and low ranking soldiers, these measures may be more effective.

A second area where we believe renewed efforts will be beneficial is in completing documentation of the cultural resources managed by USAG Fort Carson. At Down Range Fort Carson (DRFC), the PA task tracker lists 23 sites that have not been fully documented. We suggest prioritizing documentation of these sites and sites at PCMS as well as the various mitigation projects agreed to in the DRFC PA, including the Native American Ethnographic Oral History Project, the Archaeological Context Project, and the Santa Fe Trail Community Outreach Project. We suggest that completing the re-assessment of the Turkey Creek Rock Art District (HC#72565) should also be prioritized in order to better protect the important cultural resources within DRFC. Our office requested in a letter dated August 20, 2018 (HC#72565) that USAG Fort Carson determine how the district will be defined and managed in the future prior to providing comment on the 24 sites within Turkey Creek which could contribute to the district under one or more of the proposed definitions and urge USAG Fort Carson to renew efforts to refine the district definition.

Our second general comment concerns the training exercises conducted by USAG Fort Carson. While many of the activities associated with training exercises were categorized as exempted activities within the PAs, we suggest that military use of the landscape has the potential to adversely affect historic properties. As such, our office suggests that while the minimization measures used to date should be continued, mitigation of adverse effects should also begin. We request that USAG Fort Carson initiate consultation to mitigate the direct, indirect, and cumulative adverse effects of military use of DRFC and PCMS.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us, Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or jason.obrien@state.co.us, or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



**Attachment 3:
SHPO Comments on FY2018 PCMS PA Annual Report (HC#65747)**

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2018-308, 309, 311: Our office has provided concurrence on all non-exempt undertakings listed in this section. However, we received a letter dated November 12, 2018 from Kimball M. Banks on behalf of the Colorado Council of Professional Archaeologists questioning the appropriateness of the inventories that have been conducted at both Fort Carson and PCMS. They request that as many of the older surveys are non-specific regarding level and method of inventory the areas covered by these surveys should be re-inventoried. They question whether or not all sites have been identified, meaning that the method of site visits may be inadequate for resource protection as this method assumes that all sites have been identified in the areas surveyed. While we understand that given the magnitude of land managed by USAG Fort Carson and lack of cultural resource work by Army prior to the signing of the PA, USAG Fort Carson determined that accepting these surveys was the best course of action at the time, we suggest that USAG Fort Carson begin to assess the effectiveness of prior surveys and seriously consider developing a plan for phased identification of these areas over the next 5 to 10 years.

III. Action Updates

A. Status of Tasks Implemented under Stipulations I, III, and IV

I.B: We suggest that administrative protections, such as those provided to the approximately 555 needs data sites that have not yet been evaluated for eligibility for listing on the National Register of Historic Places, are inadequate and should not be considered to fulfill this stipulation alone. As the administrative protections are faulty (equipment failure, user ability to toggle on/off, improper maps uploaded to the equipment, maps not provided to all vehicles, etc.) until additional measures are implemented for all needs data sites, this stipulation is not fulfilled.

III.A: See comment I.B above. We suggest this is true for eligible sites as well and suggest that the efficacy of physical marking be evaluated. As large components of the training conducted at PCMS is done with night vision, we feel that Seibert markers, which may not be highly visible with night vision equipment, may not be the most appropriate option.

III.D: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to the equipment, and the fact that not all training vehicles/aircraft are provided with digital or hard copy maps that contain site locations means that the current method demonstrates that progress is being made to fulfill this stipulation, but that additional work is needed.



B. Cultural Resource Awareness Training

While we view the current education and training program as progress, we suggest that the number of inadvertent entries during each training exercise at PCMS, including the repeated entry at many sites over multiple exercises, indicates that there is still work to be done. What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis to emphasize that, although they may be in command of the training exercise, they must also require their troops to comply with regulations and laws to protect cultural resources. We feel that if education is emphasized for both high and low ranked soldiers, these measures may be more effective.

C. Brigade Training Exercises

We suggest that all training exercises have the potential to adversely affect historic properties located at PCMS. The Warhorse Rampage, Raider Focus, and Iron Strike trainings demonstrate that protected cultural resources will be entered when brigade trainings are conducted at PCMS. As such, our office suggests that while the minimization measures used to date should be continued, mitigation of adverse effects should also begin. We request that USAG Fort Carson initiate consultation to mitigate the direct, indirect, and cumulative adverse effects of military use of PCMS.

D. Inadvertent Entries and/or Impacts to Historic Properties

See comment C above. We look forward to continued consultation to resolve the effects of the 3ABCT Iron Strike training exercise.

E. Inadvertent Discoveries

No comments.

F. Emergency Response

No comments.

G. Amendment

We note that the updated Appendix 2 (Enclosure 6) does not contain a legend for the category "Current Physical Protection Measures (Protection Measure Category)." We are curious as to the distinctions between some of the measure categories, for example, what distinguishes "None (Administrative)" from "None (Standard)" and "None (Nominal)"? As Stipulation III.A provides multiple alternatives within each category, some of which overlap, we request further clarification, particularly as to the meaning of "None (Standard)."

In order to fulfill Stipulation I.B, protection must be given to all needs data sites. In order to fulfill Stipulation III.A, protections must be given to all eligible sites. As detailed in Stipulation III.A.2, standard protective measures are defined as a combination of boulders, fencing, stakes, and/or signage. We are



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curious how these entirely physical protective measures can be carried out when "None" appears to indicate that no physical protection has been implemented.

H. Other

See comment C above. We look forward to continued consultation to resolve finding of effect for the 16 remaining sites, many of which we have not provided concurrence on due to the lack of an eligibility determination ("needs data").

ENCLOSURE 4:
NOT 1 MORE ACRE! CORRESPONDENCE ON FY18 ANNUAL REPORT

December 14, 2018

VIA EMAIL (jennifer.r.kolise.civ@mail.mil)

Jennifer Kolise
Cultural Resource Manager
U.S. Army Installation Command, Public Works
1626 Evans St., Bldg, 1219
Fort Carson, CO 80913-4143

Re: Comments on PCMS FY 2018 Annual Cultural Resources Report

Dear Ms. Kolise:

On behalf of Not 1 More Acre!, (“N1MA!”), these comments are submitted on Army’s Fiscal Year 2018 Annual Report required by the 2014 Programmatic Agreement, (“2014 PA”), pertaining to cultural resources at Piñon Canyon Maneuver Site (“PCMS”).

A review of the FY 2018 Annual Report shows that since the FY 2017 Annual Report was issued a year ago, nothing has changed in any material respect for the better. All, or virtually all, of N1MA!’s comments made a year ago are still valid and have not been meaningfully rebutted.

The situation is dire for both the environment and protected cultural resources on and surrounding Piñon Canyon Maneuver Site. Army continues to treat this vast and invaluable resource as a “sacrifice zone” where nonsensical decisions, institutional neglect, a lack of site-specific advance planning and the accumulated impacts of unaddressed injuries caused by waves of massively destructive use involving military vehicles, aviation assets, firepower and dismounted ground operations result in inevitable destruction of the natural and cultural environment to the detriment of the entire region.

Army’s stated policy goal for Piñon Canyon Maneuver Site is to achieve compliance with cultural resources laws “while maintaining the largest possible area for military training.” FC Reg. 200-1 §9-1a. This means, according to Army, that its cultural resources program exists to “support” military training requirements at PCMS. (p.98).

The end result is that destruction of cultural resources by military training operations, followed by “red-tape” wrangling over “adverse effects” that drags on indefinitely without resolution, is fully in line with established policy at PCMS where cultural resources exist solely to “support” military training.

Repeatedly running over protected sites until they are no longer practically worth protecting, e.g. 5LA9027, surely achieves the Army’s “maximum area for training” policy.

Same Bad Situation, Year After Year

As of today, in fact, as the Annual Report makes clear, the *status quo* continues to reign supreme at PCMS:

- 1) Army remains in violation of the 2014 PA and National Historic Preservation Act, ("NHPA"), for incidents during brigade training exercises extending back at least to 2010;
- 2) New violations in the form of military vehicle entries into protected historic properties continue to occur and are occurring in even greater numbers than previously;
- 3) New violations are piling up faster than old ones are resolved;
- 4) Comments from interested parties for constructive change and mitigation to protect cultural resources are treated by Army with arrogant dismissiveness;
- 5) Army continues to treat cultural resources protection as a paperwork exercise, with little regard for on the ground protection of resources;
- 6) Army continues to regard "consultation" requirements under the NHPA as merely writing dismissive letters in response to interested parties, without bothering to make any substantive changes;
- 7) Army insists on treating cultural resources in a "piecemeal" fashion without recognizing indirect effects or cumulative effects from military use of PCMS including Army brigade training and other operations.

Because of this despicable situation a year ago, N1MA! advocated for termination of the 2014 PA pursuant to 36 C.F.R. §800.14(b)(2)(iv) and Stipulation VII.E. of the 2014 PA. A year later, the situation has only worsened. Accordingly, N1MA! once again calls for the termination of the 2014 PA.

More, not Less, 'Needs Data' Sites

Last year, N1MA! complained about Army's lagging compliance with the 2014 Programmatic Agreement at stipulation I.B, which requires that Army shall complete documentation of "needs data" resources generally by March 22, 2017 if sites are not otherwise adequately protected.

The 2017 Annual Report claimed this task was "completed," while admitting that despite the lapsing of this deadline, 468 "needs data" sites remained to be evaluated. Administrative protections supposedly afforded for protection of these sites were never announced or disclosed.

The 2018 Annual Report at Enclosure II also claims this task is "completed," but shows 555 sites remain to be evaluated, and again there is no disclosure of the administrative protections supposedly afforded for these sites. If anything, Army is going backward instead of making progress on surveying unstudied areas.

In its response to a letter from the Colorado Council of Professional Archaeologists attached to the Annual Report, Army boldly but incorrectly claims that no further surveying is required under the 2014 PA. (p.70).

Further, Army claims in response to Otero County that unsurveyed areas may be affected by proposed undertakings if they are listed as exempt in the 2014 PA. (p.82). This is also incorrect. The 2014 PA at Stipulation II.C. bars even exempt activities on unsurveyed lands, with the exception of foot traffic and aviation over-flight.

To the extent that Army may be relying on designations of some areas for dismounted only use, it is notable that Army's own inadequate After Action Reviews have shown military vehicle intrusions during exercises even in these areas. To the extent Army may be relying on Global Positioning System ("GPS") navigational tools, at last report, these tools were not installed on all vehicles and were being "turned off" intentionally in some instances to simulate opposing forces in a war game. The Annual Report does not address these failures.

Insufficient Protections for Cultural Resources

Last year, N1MA! complained about lack of compliance with Stipulation III.A. because more than 800 of the 1,200 protected historic properties on Piñon Canyon Maneuver Site had no on-the-ground protection. This year, more than 800 protected properties are still noted as unprotected except for terrain and undefined administrative protections, which, if they exist, have failed in the past to prevent vehicle intrusions.

Still Using Highly Toxic Herbicides Without Consultation

Last year, N1MA! complained about how Army manipulates both the National Environmental Policy Act, ("NEPA"), and NHPA processes to avoid public disclosure and public input concerning the use of highly toxic herbicides at PCMS to address invasive species that are proliferating from Army's land use that is destroying shortgrass prairie ecology at the headwinds of the Dust Bowl, and stirring up regional environmental calamity. N1MA! complained that a U.S. Freedom of Information Act ("FOIA") request for information on one of these applications had not been responded to by Army.

One year later, the Annual Report reflects that Army once again evaded public disclosure and review under both the National Historic Preservation Act and the National Environmental Policy Act on all toxic invasive species treatments during 2018. Army's only response in 2017 was to say that sometimes it does not use highly toxic herbicides, but sometimes it does.

One year later, Army still has not responded to grant or deny N1MA!'s FOIA request and has not provided a single responsive document.

In 2017, Army blamed this lack of a response on a need for "coordination with another federal agency" – without disclosing this "other" agency was Army's own Installation Management Command. No matter whether Fort Carson or Installation Management Command is at fault for a lack of a response, Army has failed to respond in violation of the Freedom of Information Act.

This is part and parcel of Army's arrogant and dismissive response to any and all outside comment on Piñon Canyon Maneuver Site mismanagement.

GPS Navigational Tool Mitigation Inadequate

Last year, N1MAI complained that Army falsely claimed it had “completed” the task required by Stipulation III.D. of the 2014 PA requiring it to provide training aircraft and vehicles with Global Positioning System (“GPS”) technology as a means of knowing the locale of protected properties to be implemented no later than April 22, 2015.

In response, Army admitted that it had been relying on distribution of “paper maps” in some instances in lieu of working GPS systems or in instances where opposing forces are asked to turn off their GPS systems.

The FY 2018 does not address these problems, and again claims without any documentation, that this task was “completed.”

Failing to Consider Cumulative Effects

Last year, N1MAI noted that the Annual Report contained no acknowledgement of, and mitigation strategies for, cumulative effects not previously identified as required by Stipulation VI.A. of the 2014 PA. This year’s Annual Report also omits the same required discussion.

This failure is part and parcel of a pattern by Army in which the “area of potential effects” (“APE”) of undertakings are very narrowly construed, and indirect or cumulative effects are dismissed with little or no discussion.

By way of example, Army attaches at Enclosure 5 an exchange of letters with Otero County in which it refuses to consider indirect effects to the Santa Fe Historic Trail just outside the PCMS boundary.

Army also attaches at Enclosure 7 p.374 its rejection of assertions by SHPO that “21 of the 47 previously recorded sites – or 44.7% of the protected properties under the terms of the current PA – show evidence of cumulative impacts associated with ‘past training maneuver’ in addition to disturbances attributed to the current undertaking.” Army responded: “The USAG Fort Carson stands by our determination of effect that ‘no adverse effects’ have occurred at these protected sites.”

The documents also show Army rejected out of hand a proposal of one of its own contracted scientists for recognition of proposed archaeological districts under NHPA. (pp. 407-408).

In its response in 2017, Army admitted that its operations cause cumulative effects to cultural resources properties but would only say that consultation is ongoing. A year later, no reference to these ongoing consultations or any potential resolution of them is made.

There is no resolution because Army continues to refuse to admit that cumulative and indirect impacts are occurring and attempt to address them.

New Brigade Exercise With Extensive Violations

The Annual Report notes that the Iron Strike Brigade Exercise in August and September 2018 had resulted so far in 62 potential vehicle intrusions on protected properties, although the After Action Review was not yet due or completed.

If Army cultural resources mitigation were working, such a large number of violations should not have been occurring four years after the 2014 PA was adopted, or the number of violations should be going down. Instead, the number of reported violations is going up, to wit:

2010 Warhorse Rampage – 39 prohibited entries on protected properties.
2013 Warhorse Charge – 21 prohibited entries.
2015 Raider Focus I – 60 prohibited entries.
2017 Raider Focus II – 45 prohibited entries.
2018 Iron Strike – At least 62 prohibited entries.

Meantime, the Annual Report attaches correspondence with Colorado's State Historic Preservation Office, ("SHPO"), showing consultation regarding the 2010, 2013, and 2015 exercises that remain unresolved. The correspondence shows Army's hard line approach and dismissive attitude to any outside viewpoints is causing the delays in resolving these issues.

At any rate, violations continue to pile up faster than old ones are resolved. All that Army could say, in its 2017 response, was, "Regrettably, consultation to resolve adverse effects (if any) takes time and cannot usually be completed before the next large-scale exercise." In making this statement, Army never even considered the option of ending new exercises until old violations are resolved and mitigation adopted. All it can offer is its "regrets" for breaking the law.

Army argues that vehicle intrusions in violation of the 2014 PA are not really violations of the PA or NHPA because Army is consulting with SHPO concerning them. However, federal regulations make emphatically clear that the legal effect of a violation of a programmatic agreement is a violation of NHPA. 36 C.F.R. §800.14(a)(4). Army remains in violation of the 2014 PA and NHPA as it has been continuously for years.

Cultural Resource Training Violations

In 2017, N1MA! complained about compliance with Stipulation V.A. requiring that Army give "cultural resources awareness training for all personnel involved in the execution of undertakings within the area of potential effects on an annual basis." N1MA! pointed out that personnel participating in PCMS training and operations are drawn from military installations around the country, and the globe, rather than only from Fort Carson.

Army did not respond in 2017 concerning this issue, and there is no response that this issue has been addressed in its FY 2018 Annual Report either.

Dispute Resolution

The FY 2018 Annual Report at subheading H lists purported "Dispute Resolution" and references letters from N1MA! and the Otero County Commissioners and Army's responses.

These letters and responses show nothing was resolved, however. Army repeatedly treats interested party comments with arrogant dismissiveness and pretends that that “resolves” the matter.

This is nothing remotely like the “consultation” required by NHPA, 36 C.F.R. §800.16(f), or the fostering of public participation required by NEPA. 40 C.F.R. §1506.6.

Under NHPA guidance, in “consulting” under the statute, an agency should “acknowledge ... and seek to understand” the interests and views of interested parties, and in response, “[d]evelop and consider a full range of options...” and “[t]ry to identify solutions that will leave all parties satisfied.” 63 Fed. Reg. 20496, 2054. Nothing like that occurred here.

NEPA Violations Continue

In enclosure 1, Army falsely claims credit for “NEPA reviews” for various undertakings such as for Army’s conversion of a Fort Carson infantry brigade training at Piñon Canyon Maneuver Site to an armored brigade and for prescribed burns.

No publicly available NEPA reviews pertaining to PCMS were conducted for these projects. Army merely prepared some paperwork, called Records of Environmental Consideration, (“REC”), which is not a NEPA review, but rather an internal Army review attempting to justify why it did not do a NEPA review. 32 C.F.R. §651.19. More accurately, a REC is a list of bureaucratic excuses for not doing a NEPA review. It is done without public notice, without acceptance of any public input or public disclosure of the supposed result. If there is any consideration of less environmentally damaging alternatives, it is anyone’s guess, but in the absence of any public scrutiny, it is very doubtful.

Army did prepare a Programmatic Environmental Assessment (“PEA”) on the conversion of an infantry brigade to an armored brigade – portending huge additional training impacts to PCMS – but did not consider, disclose or take public comments on impacts to PCMS, finding these impacts purportedly covered by the 2015 PCMS Training & Operations EIS. Ironically, the PEA did assess effects on Fort Carson and all other military bases considered as potential sites for a new armored brigade – only PCMS was omitted from the analysis.

Army did not review site-specific impacts in the 2015 Environmental Impact Statement (“EIS”). That EIS covered the entire large expanse of PCMS generally omitting significant required data. And, Fort Carson / IMCOM / Army did not and does not prepare Environmental Assessments for subsequent brigade exercises or other site-specific uses. Army admits, for example, that no NEPA review was done for the 2014 Programmatic Agreement amendments considered and adopted this year despite public interest and controversy in light of Army’s poor track record with respect to cultural resources. As a result, Army never considers site-specific impacts, or consequently, site-specific mitigation, as required by the National Environmental Policy Act, a law of the United States of America.

The most fundamental principle underlying NEPA is that an agency must “look before it leaps.” Instead, in line with its absurd decision to conduct military training and operations on fragile shortgrass soils at the headwinds of the Dust Bowl, Army habitually “leaps before it looks.” Laws demanding public disclosure and rigorous scientific analysis of the impacts of Army’s plans are collateral damage in Army’s campaign to delude the public about the severe regional consequences Army and its contractors are stacking up -- site by site -- at Piñon Canyon Maneuver Site.

This is doubly significant because a recent National Historic Preservation Act undertaking for proposed dam construction at multiple locations and other bank stabilizations projects failed to include site-specific descriptions of the proposed work, making site-specific proposed mitigation under the NHPA impossible to achieve.

Sikes Act Violations

The Army's Installation Natural Resource Management Plan is now a year out of date and is thus not in compliance with the Sikes Act. 16 U.S.C. §670a(b)(2). Thus, again, the effect of the National Historic Preservation Act violations is amplified by accumulating and overlapping simultaneous violations of other environmental laws by Army including the National Environmental Policy Act and the Sikes Act.

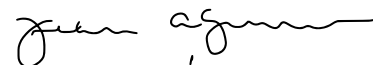
Unwelcoming Environment

N1MA! also objects to the scheduling of the Annual Cultural Resources Consultation Meeting on Jan. 26 at Fort Carson. A militarized, secured Army base is not a "public" location, and is certainly not a welcoming environment for interested parties to attend and provide unvarnished comments. Army has used this ploy in the past, and it is just another means Army uses to dissuade and dismiss public comment and avoid true "consultation" under the NHPA.

N1MA!'s Position on Standard Dismissive Response

Finally, should Army respond to this letter by sending a letter dismissing each of these concerns, as it has in the past, please be advised in advance that N1MA! rejects such a response, does not regard such a letter as valid "consultation" under NHPA 36 C.F.R. §800.14(f), 63 Fed. Reg. 20496, 2054, and, in the event N1MA! elects not to file a further written response thereafter, it should not be deemed or characterized as "accepting" or "agreeing to" or "satisfied by" such a response.

Sincerely,



Jean Aguerre for Not 1 More Acre!

cc: SHPO
ACHP



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
US ARMY INSTALLATION MANAGEMENT COMMAND
DIRECTORATE OF PUBLIC WORKS
1626 EVANS STREET, BLDG 1219
FORT CARSON, CO 80913-4143

February 25, 2019

Ms. Jean Aguerre
Not 1 More Acre!
P.O. Box 773
Trinidad, Colorado 81082

Dear Ms. Aguerre:

Thank you your correspondence dated December 14, 2018, concerning the fiscal year (FY) 2018 Annual Report for the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). The intention of this letter is to address your comments on the FY2018 Annual Report. Enclosure 1 includes the USAG Fort Carson's response to your comments. To ensure all concerns have been adequately addressed, your specific comment has been cited in its entirety followed by our response. The USAG Fort Carson appreciates your organization's views on this matter.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,

A handwritten signature in blue ink, appearing to read "Carlos Rivero-deAguilar", is positioned below the "Sincerely," text.

Carlos Rivero-deAguilar
Chief, Environmental Division

Enclosure

Enclosure 1: USAG Fort Carson's Response to Specific Comments from Not 1 More Acre! Related to the FY2018 Annual Report for the PCMS PA

The following are the U.S. Army Garrison (USAG) Fort Carson's responses to concerns raised by Not 1 More Acre! (N1MA!) in correspondence dated December 14, 2018, regarding the fiscal year (FY) 2018 Annual Report for the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA).

N1MA's Comment #1: *A review of the FY 2018 Annual Report shows that since the FY 2017 Annual Report was issued a year ago, nothing has changed in any material respect for the better. All, or virtually all, of N1MA's comments made a year ago are still valid and have not been meaningfully rebutted.*

USAG Fort Carson's Response #1: The USAG Fort Carson thoroughly addressed your comments on the FY2017 Annual Report in correspondence dated December 20, 2017, which was also included in Enclosure 4 of the FY2018 Annual Report.

N1MA's Comment #2: *The situation is dire for both the environment and protected cultural resources on and surrounding Piñon Canyon Maneuver Site. Army continues to treat this vast and invaluable resource as a "sacrifice zone" where nonsensical decisions, institutional neglect, a lack of site-specific advance planning and the accumulated impacts of unaddressed injuries caused by waves of massively destructive use involving military vehicles, aviation assets, firepower and dismounted ground operations result in inevitable destruction of the natural and cultural environment to the detriment of the entire region.*

USAG Fort Carson's Response #2: We disagree with the conclusions that N1MA! makes in this comment. The Army continues to balance appropriately the national security need to provide adequate training for our Soldiers with our responsibility to be good stewards of the environment.

N1MA's Comment #3: *Army's stated policy goal for Piñon Canyon Maneuver Site is to achieve compliance with cultural resources laws "while maintaining the largest possible area for military training." FC Reg. 200-1 §9-1a. This means, according to Army, that its cultural resources program exists to "support" military training requirements at PCMS. (p.98).*

USAG Fort Carson's Response #3: The Piñon Canyon Maneuver Site (PCMS) is a sub-installation of Fort Carson. It was developed as a training site for large-scale military maneuvers. One mission of the assigned 4th Infantry Division and Fort Carson is to prepare "*trained and ready expeditionary forces for deployment in support of Combatant Commander requirements.*" The USAG Fort Carson's mission is to provide "*mission readiness, support, and services for Fort Carson Soldiers, Families, and the Community to fight and win our nation's wars.*" As an organization under the USAG Fort Carson, the primary mission of the Cultural Resources Management Program is to

provide support for military readiness, while ensuring compliance and stewardship responsibilities are met.

As stated in our Integrated Cultural Resources Management Plan (ICRMP; pages 3 and 82), our goals are to:

1. Support sustainable training;
2. Reduce/eliminate access restrictions due to resource protection;
3. Protect historic properties from adverse effects;
4. Conserve cultural resources and their information for future generations;
5. Increase cultural resources appreciation; and
6. Contribute to our understanding of cultural history, and archaeology at the local, regional, and national levels.

The following objectives were established to accomplish these goals (page 83):

1. Provide accurate data regarding access restrictions;
2. Monitor cultural resources for impacts;
3. Implement protective measures;
4. Implement conservation measures;
5. Integrate cultural resources management with Installation operations;
6. Implement consultation with external stakeholders; and
7. Sustain public outreach.

We accomplish these goals and objectives through compliance with all relevant federal, state, and local cultural resources-related legislation; Department of Defense and Department of Army regulations and policies, and agreement documents, while maintaining a proactive program to identify, document, and evaluate cultural resources.

N1MA!’s Comment #4: *The end result is that destruction of cultural resources by military training operations, followed by “red-tape” wrangling over “adverse effects” that drags on indefinitely without resolution, is fully in line with established policy at PCMS where cultural resources exist solely to “support” military training.*

Repeatedly running over protected sites until they are no longer practically worth protecting, e.g. 5LA9027, surely achieves the Army’s “maximum area for training” policy.

USAG Fort Carson's Response #4: A site entry does not equate to an adverse effect to a historic property, or "destruction of cultural resources." With regards to the 2010, 2013, 2015, and 2017 brigade training exercises at PCMS, a total of 153 protected resources have been entered. For 12 of these, a finding of adverse effect has been determined; for 56, our finding was "no historic properties affected; and for 85, the finding was "no adverse effects to a historic property." The Colorado State Historic Preservation Officer (SHPO) has concurred with findings of effect for 137 protected resources entered during past brigade exercises. Consultation concerning our findings of effects is ongoing for 16 sites.

In Enclosure 7 of the FY2018 Annual Report (pages 265 to 266), a timeline of correspondence between the USAG Fort Carson and the SHPO was included. The USAG Fort Carson has worked diligently to conduct evaluations at "needs data" sites to assess a site's eligibility for inclusion in the National Register of Historic Places (NRHP) and to complete baseline monitoring at all NRHP-eligible sites. We have reconciled our data with the SHPO's data, ensuring all site documentation and associated technical reports of investigations have been provided to the SHPO. Only recently has the SHPO concurred with our findings of effect for 137 or the 153 protected resources that have been entered during one of the past brigade exercises. The USAG Fort Carson has awarded a contract for the development of mitigation plans for sites at which adverse effects have occurred, as well as for sites that have been entered multiple times. The mitigation plans will help guide future discussions to resolve for adverse effects that have occurred as a result (direct, indirect, and cumulative) from military training activities.

With regards to site 5LA9037 (not 5LA9027 as stated in your letter), this site was impacted by military training activities in the 1980s and 1990s prior to its documentation in 2000, and was entered during the 2010, 2013, and 2015 brigade training exercises. As a result of direct and cumulative impacts from military training and natural erosional processes, the USAG Fort Carson did determine the site had been adversely affected. Detailed information on 5LA9037 and our finding of effect can be found in correspondence to the SHPO dated November 8, 2016, and January 18, 2018, included in Enclosure 7 of the FY2018 Annual Report (pages 351, 375, and 376).

N1MA!'s Comment #5: *As of today, in fact, as the Annual Report makes clear, the status quo continues to reign supreme at PCMS:*

- 1) Army remains in violation of the 2014 PA and National Historic Preservation Act, ("NHPA"), for incidents during brigade training exercises extending back at least to 2010;*
- 2) New violations in the form of military vehicle entries into protected historic properties continue to occur and are occurring in even greater numbers than previously;*
- 3) New violations are piling up faster than old ones are resolved;*

- 4) *Comments from interested parties for constructive change and mitigation to protect cultural resources are treated by Army with arrogant dismissiveness;*
- 5) *Army continues to treat cultural resources protection as a paperwork exercise, with little regard for on the ground protection of resources;*
- 6) *Army continues to regard "consultation" requirements under the NHPA as merely writing dismissive letters in response to interested parties, without bothering to make any substantive changes;*
- 7) *Army insists on treating cultural resources in a "piecemeal" fashion without recognizing indirect effects or cumulative effects from military use of PCMS including Army brigade training and other operations.*

USAG Fort Carson's Response #5: An inadvertent entry into a protected resource is not a violation of the NHPA or the PCMS PA. As previously stated in our earlier letter dated December 20, 2017, included in Enclosure 4 of the FY2018 Annual Report, the intent of the NHPA is to charge federal agencies with responsible stewardship to include creation of historic preservation programs, designation of a historic preservation officer, development of a process for nominating properties to the National Register of Historic Places, and consideration of effects of its actions on historic properties, which the Army and USAG Fort Carson has done. As funding allows, we continue to proactively identify and evaluate cultural resources under Section 110 of the NHPA. The USAG Fort Carson continues to review its cultural resources best management practices to avoid, minimize or mitigate adverse effects on historic properties.

The USAG Fort Carson has implemented protection measures and a monitoring program to determine the effectiveness of those protection measures in accordance with Stipulations III and IV of the PCMS PA. The USAG Fort Carson, SHPO, and the Advisory Council on Historic Preservation (ACHP) acknowledge entries or other impacts may occur to protected properties; and as such, provisions for inspection and monitoring were included in the PA (Stipulation IV).

In collaboration with the Directorate of Plans, Training, Mobilization, and Security (DPTMS), the Cultural Resources Management Program has developed prioritization criteria for site marking, evaluation, and mitigation of protected resources. As a result of this collaboration, boulders have been placed at 4 areas, protecting 12 sites, and another site marking project was awarded in September 2018 with work to begin in March 2019. An in-house project to place NATO Standard Passage Markers along authorized travel corridors through protected resources and to correct improperly marked resources is ongoing.

Section 106 consultation is ongoing regarding effects to historic properties resulting from past training exercises in accordance with 36 CFR 800.6. The PCMS PA was not in effect when the 2010 and 2013 brigade-level training exercises occurred. Per Stipulation IV.B of the PA, the USAG Fort Carson completed its after action inspections of protected properties and reported results of these inspections to the SHPO, Native

American Tribes, and other consulting and interested parties within 90 calendar days following the exercise for the 2015 1st Stryker Brigade Combat Team (1SBCT), 2017 1SBCT, and 2018 4th Combat Aviation Brigade (4CAB) training exercises. The after action inspections for the 2018 3rd Armored Brigade Combat (3ABCT) training exercise was completed within 90 days per Stipulation IV.B; the associated report was submitted to the SHPO, Native American Tribes, and other consulting and interested parties on January 15, 2019. The USAG Fort Carson does consider direct, indirect, and cumulative impacts when assessing effects to historic properties, as evidenced in Enclosure 7 of the FY2018 Annual Report.

The USAG Fort Carson is open and receptive to constructive feedback from the SHPO, ACHP, Native American Tribes, and other consulting and interested parties. When practical, this feedback is incorporated into the Cultural Resources Program's best management practices. We host annual meetings with our consulting and interested parties to discuss the management of cultural resources at Fort Carson and the PCMS.

N1MA!'s Comment #6: *Because of this despicable situation a year ago, N1MA! advocated for termination of the 2014 PA pursuant to 36 C.F.R. §800.14(b)(2)(iv) and Stipulation VII.E. of the 2014 PA. A year later, the situation has only worsened. Accordingly, N1MA! once again calls for the termination of the 2014 PA.*

USAG Fort Carson's Response #6: We note that N1MA! would like the PCMS PA to be terminated. We do not think it should be terminated. Only the signatories to that agreement (USAG Fort Carson, SHPO, or ACHP) can terminate the PA.

N1MA!'s Comment #7: *Last year, N1MA! complained about Army's lagging compliance with the 2014 Programmatic Agreement at stipulation I.B, which requires that Army shall complete documentation of "needs data" resources generally by March 22, 2017 if sites are not otherwise adequately protected.*

The 2017 Annual Report claimed this task was "completed," while admitting that despite the lapsing of this deadline, 468 "needs data" sites remained to be evaluated. Administrative protections supposedly afforded for protection of these sites were never announced or disclosed.

The 2018 Annual Report at Enclosure II also claims this task is "completed," but shows 555 sites remain to be evaluated, and again there is no disclosure of the administrative protections supposedly afforded for these sites. If anything, Army is going backward instead of making progress on surveying unstudied areas.

USAG Fort Carson's Response #7: This comment was addressed in our correspondence dated December 20, 2017 at Enclosure 4 of the FY2018 Annual Report. Please refer to USAG Fort Carson's Response #5 found on page 54-55.

Appendix 2 of the PCMS PA identifies the protection measure category into which each protected resource falls. All "needs data" sites fall within the "Administrative" protection measure category. A revised Appendix 2 was provided to the SHPO, Native American Tribes, and other consulting parties and interested parties for review on October 25,

2017, as part of the consultation process for amending the PCMS PA. Your correspondence dated November 27, 2017, January 16, 2018, and January 30, 2018, concerning the PCMS PA amendments did not include comments on the revised Appendix 2. Additional updates to Appendix 2 were provided in Enclosure 6 of the FY2018 Annual Report.

Defined in Stipulation III.A4 of the PCMS PA, an administrative protective measure is a policy that restricts access to and/or activity within an area. It further states protected resources in this category are typically unmarked. It is administrative policy that mounted maneuvers and other ground-disturbing activities are not authorized within "needs data" sites. These sites are not only protected by this administrative policy, but also their location is maintained in a geospatial information systems (GIS) geodatabase, and is included on the Resource Protection map. This information is provided to proponents in the appropriate format prior to the initiation of an undertaking to include military training exercises.

The increase from 468 "needs data" sites to 555 "needs data" sites is due to the addition of several resources, which had been recorded as isolated finds, now being considered as potential sites that require further evaluation.

N1MAI's Comment #8: *In its response to a letter from the Colorado Council of Professional Archaeologists attached to the Annual Report, Army boldly but incorrectly claims that no further surveying is required under the 2014 PA. (p.70).*

USAG Fort Carson's Response #8: The Colorado Council of Professional Archaeologists had questioned in reference to Appendix 1 – Exempted Undertakings of the PCMS PA if the areas in which the exempted undertakings would take place have been inventoried and historic properties identified.

In response, we stated that approximately 93% of the PCMS has been inventoried; the remaining 7% is located within the canyon areas and interior fence boundary. PCMS PA Figure 3 illustrates the unsurveyed lands as of November 2017.

Stipulation I.C of the PCMS PA states this about survey in Areas of Potential Effect (APE): "No additional survey is required within the APE unless necessary to execute an undertaking not identified as exempted in Appendix 1." This means the USAG Fort Carson is not required to conduct additional surveys under Section 110 of the NHPA, but we are required to conduct surveys in unsurveyed areas should a Section 106 undertaking that is not considered an exempted activity occur within those areas. To date, no non-exempted undertakings have been proposed to occur on unsurveyed areas of the PCMS. If a non-exempted undertaking is proposed to occur on unsurveyed areas of the PCMS, then the USAG Fort Carson will be required to survey the area in accordance with Section 106 of the NHPA and Stipulation I.C of the PCMS PA.

N1MAI's Comment #9: *Further, Army claims in response to Otero County that unsurveyed areas may be affected by proposed undertakings if they are listed as exempt in the 2014 PA. (p.82). This is also incorrect. The 2014 PA at Stipulation II.C.*

bars even exempt activities on unsurveyed lands, with the exception of foot traffic and aviation over-flight.

USAG Fort Carson's Response #9: The USAG Fort Carson's response to the Otero County Board of Commissioners (Response #6, page 82 of the FY2018 Annual Report) does not state "that unsurveyed areas may be affected by proposed undertakings if they are listed as exempt in the 2014 PA." Please reread the full response to Otero County for a correct interpretation.

N1MA!'s Comment #10: *To the extent that Army may be relying on designations of some areas for dismounted only use, it is notable that Army's own inadequate After Action Reviews have shown military vehicle intrusions during exercises even in these areas. To the extent Army may be relying on Global Positioning System ("GPS") navigational tools, at last report, these tools were not installed on all vehicles and were being "turned off" intentionally in some instances to simulate opposing forces in a war game. The Annual Report does not address these failures.*

USAG Fort Carson's Response #10: We have acknowledged in after action reports that administrative protections are not adequate for some protected resources located on the canyon rims within the dismounted training only areas. As such, the protection measure for these sites have been modified from "Administrative" to one of the higher level protection measures. This is reflected in the Appendix 2 of the PCMS PA, which was updated as part of the amendment process. Additional changes to the Appendix 2 have been made since the amendment process; therefore, as stated in Section G of the FY2018 Annual Report, a version of the updated Appendix 2 with changes denoted was included in Enclosure 6 for review.

Producing the Resource Protection digital map for use in a tactical vehicle's Global Positioning System (GPS) is only one tool to aide in the protection of cultural resources. Other tools include, but are not limited to, paper maps, cultural resources awareness training, physical protection measures, and administrative policies. No one tool by itself is adequate for the protection of cultural resources. Discussions concerning GPS units not being installed in all tactical vehicles or not being utilized during a training exercise are included in the after action reports. These issues are also discussed at our annual meetings with interested parties, consulting parties, SHPO, and Native American Tribes.

N1MA!'s Comment #11: *Last year, N1MA! complained about lack of compliance with Stipulation III.A. because more than 800 of the 1,200 protected historic properties on Piñon Canyon Maneuver Site had no on-the-ground protection. This year, more than 800 protected properties are still noted as unprotected except for terrain and undefined administrative protections, which, if they exist, have failed in the past to prevent vehicle intrusions.*

USAG Fort Carson's Response #11: This comment was addressed in our correspondence dated December 20, 2017. Please refer to USAG Carson's Response #5 found on page 54 of the FY2018 Annual Report.

Appendix 2 of the PCMS PA identifies the protection measure category into which each protected resource falls. For example, all “needs data” sites fall within the “Administrative” protection measure category.

Defined in Stipulation III.A4 of the PCMS PA, an administrative protective measure is a policy that restricts access to and/or activity within an area. It further states protected resources in this category are typically unmarked. The majority of unmarked protected resources are “needs data” sites, terrain-protected, or located on the Hogback or within the canyon areas. The Hogback and canyons are dismounted maneuver only training areas, where off-road travel is not authorized. Mounted maneuvers and other ground-disturbing activities are not authorized within “needs data” sites. These sites are not only protected by administrative policy, but also their location is maintained in a geospatial information systems (GIS) geodatabase, and is included on the Resource Protection map. This information is provided to proponents in the appropriate format prior to the initiation of an undertaking to include military training exercises.

Administrative protections have been shown to work. In 2017, a Stryker battalion exercise was conducted in which no entries into protected resources occurred. The battalion utilized the Resource Protection map in their vehicles' GPS systems, and adhered to the administrative policies. In 2018, the 4th Combat Aviation Brigade conducted a brigade exercise at the PCMS. Again, no entries into protected resources occurred.

N1MA!’s Comment #12: *Last year, N1MA! complained about how Army manipulates both the National Environmental Policy Act, (“NEPA”), and NHPA processes to avoid public disclosure and public input concerning the use of highly toxic herbicides at PCMS to address invasive species that are proliferating from Army’s land use that is destroying shortgrass prairie ecology at the headwinds of the Dust Bowl, and stirring up regional environmental calamity. N1MA! complained that a U.S. Freedom of Information Act (“FOIA”) request for information on one of these applications had not been responded to by Army.*

One year later, the Annual Report reflects that Army once again evaded public disclosure and review under both the National Historic Preservation Act and the National Environmental Policy Act on all toxic invasive species treatments during 2018. Army’s only response in 2017 was to say that sometimes it does not use highly toxic herbicides, but sometimes it does.

USAG Fort Carson’s Comment #12: This comment was addressed in our correspondence dated December 20, 2017. Please refer to USAG Fort Carson’s Response #6 on page 55 of the 2018 Annual Report.

The suppression of invasive plant species is categorized as an exempted undertaking per the PCMS PA (see Appendix 1, Sections A.3b, B.4b2, C.3b2, and D.3b2), as long as the activity is not occurring within a historic property. The FY2017 and FY2018 Invasive Species Treatment project areas were tailored to avoid historic properties;

therefore, it did fit the requirement to be an exempted undertaking. As an exempted undertaking, no further Section 106 review was required.

We acknowledge your continued scientific disagreement concerning herbicides, but as we noted for you in previous correspondence, the USAG Fort Carson uses an integrated approach to control noxious weeds through a combination of prevention, cultural, physical, mechanical, chemical, and biocontrol methods. The use of pesticides (and herbicides) is but one component of our plan. More information on these measures can be found in the Installation's Natural Resources Management Plan (INRMP) which is prepared in cooperation with and signed by the U.S. Fish and Wildlife Service and the Colorado Division of Parks and Wildlife. The INRMP has extensive public input as well as its own NEPA review. Additionally, the USAG Fort Carson has been in collaboration with the Colorado Department of Agriculture and several universities (Texas A & M, Colorado State University, Montana State University, and Utah State) in researching biocontrol and plant material methods to control invasive species. The USAG Fort Carson only applies herbicides registered for use by both the Environmental Protection Agency (EPA) and the State of Colorado. All controlled herbicide products are only applied by properly licensed applicators in accordance with the manufacturer's labeled specifications. The USAG Fort Carson will continue to use only approved herbicide products that meet the desired invasive species control for the current environmental conditions.

The Army and the USAG Fort Carson have completed a variety of environmental analyses associated with the Installation's Integrated Pest Management Program (IPMP). The Army conducted a Programmatic Environmental Assessment (PEA) for the Implementation of the U.S. Army Integrated Pest Management Program completed by the Army Environmental Center in 2010. The USAG Fort Carson completed review of the 2015 IPMP and a Record of Environmental Consideration (REC) was completed in accordance with 32 CFR 651.19. Annually, the proposed treatment plan for execution is reviewed against the institutionalized sustainable integrated strategies and techniques previously analyzed by the Army PEA. As long as the treatment plan meets the requirements of the regulations and application guidelines then a REC is appropriate. If environmental conditions substantially change, then further environmental analysis is required.

N1MAI's Comment #13: *One year later, Army still has not responded to grant or deny N1MAI's FOIA request and has not provided a single responsive document.*

In 2017, Army blamed this lack of a response on a need for "coordination with another federal agency" – without disclosing this "other" agency was Army's own Installation Management Command. No matter whether Fort Carson or Installation Management Command is at fault for a lack of a response, Army has failed to respond in violation of the Freedom of Information Act.

USAG Fort Carson's Response #13: Questions concerning Freedom of Information Act (FOIA) requests should be directed to the Fort Carson FOIA/PA office, not the Cultural Resources Management Program:

FOIA/PA Officer
1625 Ellis Street
Building 1218, Room 101
Fort Carson, Colorado 80913
719-526-2114

A tracking number (FP-17-006615) was provided to you when you submitted your FOIA request. This tracking number can be used to learn the initial status of your request to include the organization from which the Fort Carson FOIA/PA Officer is awaiting information.

On March 7, 2017, the Fort Carson FOIA/PA Officer referred you to the Installation Management Command (IMCOM) FOIA Requester Service Center. The IMCOM FOIA Requester Service Center responds directly to the requester, not USAG Fort Carson. A new FOIA request number is assigned by the responding agency. The original FOIA request (FP-17-006615) has been "administratively closed" by the Fort Carson FOIA/PA Officer. Any questions you have should be directed to IMCOM FOIA Requestor Service Center.

The contact for IMCOM FOIA Requester Service Center is:

IMCOM FOIA Requester Service Center
HQ Army Installation Management Command
2405 Gun Shed Road
Building 2261, Room 2200
Fort Sam Houston, TX 78234
210-466-0433
Email: usarmy.jbsa.imcom-hq.mbx.fioa-requester-service-center@mail.mil

The federal agency referenced in our December 20, 2017, correspondence is the EPA, not IMCOM. The IMCOM FOIA Requester Service Center transferred the request to the EPA for an appropriate response to your request.

N1MA!'s Comment #14: *This is part and parcel of Army's arrogant and dismissive response to any and all outside comment on Piñon Canyon Maneuver Site mismanagement.*

USAG Fort Carson's Response #14: We disagree with N1MA!'s comment #14. The Army reviews and considers comments sent in from all interested parties regarding PCMS. Our responses are well-researched and accurate.

N1MA!'s Comment #15: *Last year, N1MA! complained that Army falsely claimed it had "completed" the task required by Stipulation III.D. of the 2014 PA requiring it to provide training aircraft and vehicles with Global Positioning System ("GPS") technology as a means of knowing the locale of protected properties to be implemented no later than April 22, 2015.*

In response, Army admitted that it had been relying on distribution of “paper maps” in some instances in lieu of working GPS systems or in instances where opposing forces are asked to turn off their GPS systems.

The FY 2018 does not address these problems, and again claims without any documentation, that this task was “completed.”

USAG Fort Carson's Response #15: This comment was addressed in our correspondence dated December 20, 2017. Please refer to USAG Fort Carson's Response #9 found on page 58 of the FY2018 Annual Report.

Stipulation III.D reads “USAG shall provide training aircraft and vehicles **that are equipped** with a Global Positioning System a means of knowing the locations of protected properties, to indicate training constraints located within their training footprint...” (emphasis added). Stipulation III.D of the PCMS PA does not state the Army **will install** training aircraft and vehicles with GPS systems. A Resource Protection digital map has been developed and made available for use in GPS systems of training aircraft and vehicles. This map data is updated on a quarterly basis for Range Operations, as well as before any large scale exercises. Therefore, the USAG Fort Carson has met our obligation under Stipulation III.D.

N1MA!'s Comment #16: *Last year, N1MA! noted that the Annual Report contained no acknowledgement of, and mitigation strategies for, cumulative effects not previously identified as required by Stipulation VI.A. of the 2014 PA. This year's Annual Report also omits the same required discussion.*

This failure is part and parcel of a pattern by Army in which the “area of potential effects” (“APE”) of undertakings are very narrowly construed, and indirect or cumulative effects are dismissed with little or no discussion.

By way of example, Army attaches at Enclosure 5 an exchange of letters with Otero County in which it refuses to consider indirect effects to the Santa Fe Historic Trail just outside the PCMS boundary.

Army also attaches at Enclosure 7 p.374 its rejection of assertions by SHPO that “21 of the 47 previously recorded sites – or 44.7% of the protected properties under the terms of the current PA – show evidence of cumulative impacts associated with ‘past training maneuver’ in addition to disturbances attributed to the current undertaking.” Army responded: “The USAG Fort Carson stands by our determination of effect that ‘no adverse effects’ have occurred at these protected sites.”

The documents also show Army rejected out of hand a proposal of one of its own contracted scientists for recognition of proposed archaeological districts under NHPA. (pp. 407-408).

In its response in 2017, Army admitted that its operations cause cumulative effects to cultural resources properties but would only say that consultation is ongoing. A year

later, no reference to these ongoing consultations or any potential resolution of them is made.

There is no resolution because Army continues to refuse to admit that cumulative and indirect impacts are occurring and attempt to address them.

USAG Fort Carson's Response #16: This comment was addressed in our correspondence dated December 20, 2017. Please refer to USAG Fort Carson's Response #8 on pages 57-58 of the FY2018 Annual Report.

Section I of the FY2018 Annual Report provides a brief synopsis of current Section 106 consultation to resolve for potential adverse effects from brigade exercises. Enclosure 7 of the FY2018 Annual Report includes correspondence during the reporting period concerning these consultation efforts. As noted in Enclosure 7, the USAG Fort Carson has made the finding of adverse effect due to direct, indirect, or cumulative impacts related to military training for 12 historic properties.

Although not mentioned in the FY2018 Annual Report, the USAG Fort Carson has awarded a contract to develop mitigation plans for 24 sites at the PCMS. This project includes sites that have been adversely affected (directly, indirectly, or cumulatively) by military training, as well as sites in which adverse effects have not occurred, but have been entered multiple times, and are therefore at high risk for adverse effects in the future. These plans will help guide the USAG Fort Carson in discussions with the SHPO, ACHP, Native American Tribes, and other consulting and interested parties in the resolution of adverse effects to historic properties due to military training.

As explained in our response to the Otero County Board of Commissioners via correspondence dated December 15, 2017 (USAG Fort Carson's Response #3, page 81 of the FY2018 Annual Report), the route segment of the Santa Fe National Historic Trail adjacent to the PCMS is not a "historic property" as defined by 36 CFR 800.16(l)(1), nor is it a National Historic Landmark as defined by 36 CFR 800.16(p). Thus, further consideration of adverse effects (direct, indirect, or cumulative) to this portion of the trail under Section 106 of the NHPA is not required.

The quotes, "...21 of the 47 previously recorded sites – or 44.7% of the protected properties under the terms of the current PA – show evidence of cumulative impacts associated with 'past training maneuver'..." and "The USAG Fort Carson stands by our determination of effect that 'no adverse effects' have occurred at these protected sites" (page 376 of the 2018 Annual Report), have been taken out of context.

In a letter dated November 8, 2016, the USAG Fort Carson responded to correspondence from the SHPO concerning the 2010, 2013, and 2015 exercises. Enclosure 3, from whence these quotes were taken, addresses specific comments from the SHPO on the after action report for the 2015 1SBCT "Raider Focus" Training Exercise. SHPO's Comment #2 (page 376 of the FY2018 Annual Report) referenced information in the 2015 training exercise's after action report in which the USAG Fort Carson reported 21 of the 47 previously recorded sites that had been entered during

this exercise showed evidence of previous military disturbance. The SHPO requested additional information before they could concur on the findings of effects. In our response (page 376 of the FY2018 Annual Report), as well as in the associated table, these concerns were addressed. The USAG Fort Carson analyzed the cumulative impacts, determining that "no adverse effects" occurred at these protected sites.

The SHPO did not respond to the November 8, 2016, letter; therefore, the USAG Fort Carson met with SHPO staff in May 2016 to discuss the resolution of adverse effects from past brigade exercises. At the meeting, SHPO staff requested the information provided in the tables be re-organized to facilitate ease of review. The USAG Fort Carson updated the information based on the recommendations, and provided this information to the SHPO via correspondence dated January 18, 2018.

Between March and August 2018, the USAG Fort Carson and SHPO continued to engage in discussion concerning the findings of effects related to the 2010, 2013, 2015, and 2017 exercises. To date, the SHPO has concurred with our findings of effect for 137 of the 153 sites that have been entered during these past exercises. Consultation is ongoing for 16 sites for which concurrence has not been given. There is current agreement between USAG Fort Carson and SHPO that 12 of the 153 sites entered during one of the past training events has led to an adverse effect.

In regards to the proposed archaeological districts referenced in your comment above, these districts were proposed in the 1990s by the Midwest Archaeological Center of the National Park Service (NPS). As stated in our response to the SHPO (USAG Fort Carson's Response #4, page 407-408 of the FY2018 Annual Report), the draft multiple property nominations were never finalized, and as such, are not accepted by the Army. The NPS's reasoning for recommending sites as contributing to these proposed districts relied heavily upon site documentation and the summary technical report for the archaeological investigations conducted by the University of Denver, Larson-Tibesar Associates, and Centennial Archaeology, Inc., conducted in the 1980s. This report and associated site documentation are riddled with inconsistencies and contradictions. The NPS did not conduct the appropriate level of research, investigation, or analysis to verify the data used in their recommendations. In addition, the Army does not support the creation of large, overarching archaeological districts, like those proposed by the NPS (i.e. Euro-American Archaeological District, Aboriginal Archaeological District, and Rock Art Archaeological District). Archaeological districts should be created for groups of sites that are related to a specific culture, time period, event, site type, etc. Districts should have defined boundary based on the cultural, ethnographic, or topographic landscape. The NPS's proposed districts did not consider the cultural, ethnographic, or topographic landscape. The districts' boundaries were based on the installation's boundary; nothing outside that boundary would have been considered as part of the district. District nominations should provide detailed information in terms of significance, as well as criteria for determining if a cultural resource should be considered contributing or non-contributing to the district. The NPS's draft nominations failed to provide this information. For these reasons, the USAG Fort Carson never accepted the proposed districts.

N1MAI's Comment #17: *The Annual Report notes that the Iron Strike Brigade Exercise in August and September 2018 had resulted so far in 62 potential vehicle intrusions on protected properties, although the After Action Review was not yet due or completed.*

If Army cultural resources mitigation were working, such a large number of violations should not have been occurring four years after the 2014 PA was adopted, or the number of violations should be going down. Instead, the number of reported violations is going up, to wit:

2010 Warhorse Rampage – 39 prohibited entries on protected properties.

2013 Warhorse Charge – 21 prohibited entries.

2015 Raider Focus I – 60 prohibited entries.

2017 Raider Focus II – 45 prohibited entries.

2018 Iron Strike – At least 62 prohibited entries.

Meantime, the Annual Report attaches correspondence with Colorado's State Historic Preservation Office, ("SHPO"), showing consultation regarding the 2010, 2013, and 2015 exercises that remain unresolved. The correspondence shows Army's hard line approach and dismissive attitude to any outside viewpoints is causing the delays in resolving these issues.

At any rate, violations continue to pile up faster than old ones are resolved. All that Army could say, in its 2017 response, was, "Regrettably, consultation to resolve adverse effects (if any) takes time and cannot usually be completed before the next large-scale exercise." In making this statement, Army never even considered the option of ending new exercises until old violations are resolved and mitigation adopted. All it can offer is its "regrets" for breaking the law.

Army argues that vehicle intrusions in violation of the 2014 PA are not really violations of the PA or NHPA because Army is consulting with SHPO concerning them. However, federal regulations make emphatically clear that the legal effect of a violation of a programmatic agreement is a violation of NHPA. 36 C.F.R. §800.14(a)(4). Army remains in violation of the 2014 PA and NHPA as it has been continuously for years.

USAG Fort Carson's Response #17: During the development of the PCMS PA, the USAG Fort Carson, SHPO, and ACHP acknowledged human-related impacts to protected resources may occur, particularly associated with brigade training exercises. As such, it is stipulated in the PCMS PA that the USAG Fort Carson shall inspect protected resources periodically (Stipulation IV.A) and shall inspect all protected properties within the area of potential effects following each brigade training exercise (Stipulation IV.B). Stipulation IV.B further states the USAG Fort Carson will consult with the SHPO, Native American Tribes, and other consulting and interested parties, as necessary, to resolve for adverse effects in accordance with 36 CFR 800.6(b). Before consultation to resolve for adverse effects can occur, we must first have concurrence from the SHPO on our findings of effects for those protected resources that have been entered. Not all inadvertent entries result in an adverse effect. Not all protected resources are historic properties as defined by the NHPA. As stated in our

correspondence dated December 20, 2017 (page 54 of the FY2018 Annual Report), consultation takes time and cannot usually be completed before the next large-scale exercise. Nothing in the PCMS PA states military training cannot continue until adverse effects associated with a previous brigade training exercise has been resolved. As such, the USAG Fort Carson is not in violation of the PCMS PA or the NHPA.

N1MA1's Comment #18: *In 2017, N1MA! complained about compliance with Stipulation V.A. requiring that Army give "cultural resources awareness training for all personnel involved in the execution of undertakings within the area of potential effects on an annual basis." N1MA! pointed out that personnel participating in PCMS training and operations are drawn from military installations around the country, and the globe, rather than only from Fort Carson.*

Army did not respond in 2017 concerning this issue, and there is no response that this issue has been addressed in its FY 2018 Annual Report either.

USAG Fort Carson's Response #18: This comment was addressed in our correspondence dated December 20, 2017. Please refer to USAG Fort Carson's Response #11 on pages 59-60 of the FY2018 Annual Report.

Section III.B of the FY2018 Annual Report (page 2) lists the cultural resources awareness training materials that are provided on an annual basis to Soldiers, civilian employees, contractors, and other users, as appropriate. This is all inclusive of "personnel involved in the execution of undertakings within the area of potential effects," and would include "personnel participating in PCMS training and operations...drawn from military installations around the country, and the globe, rather than only from Fort Carson."

As stated in our response, additional training materials, briefs, and presentations are provided on an as-needed basis, specific to the situation. For example, a cultural resources awareness training brief is conducted at the Observer Controller/Trainers Academy prior to a large-scale exercise. When sending out the Resource Protection map, a brief is provided with instructions on how to read the symbols on the map, and what types of physical protection measures may be surrounding these resources.

N1MA1's Comment #19: *The FY 2018 Annual Report at subheading H lists purported "Dispute Resolution" and references letters from N1MA! and the Otero County Commissioners and Army's responses.*

These letters and responses show nothing was resolved, however. Army repeatedly treats interested party comments with arrogant dismissiveness and pretends that that "resolves" the matter.

This is nothing remotely like the "consultation" required by NHPA, 36 C.F.R. §800.16(f), or the fostering of public participation required by NEPA. 40 C.F.R. §1506.6. Under NHPA guidance, in "consulting" under the statute, an agency should "acknowledge ...and seek to understand" the interests and views of interested parties, and in response, "[d]evelop and consider a full range of options..." and "[t]ry to identify

solutions that will leave all parties satisfied.” 63 Fed. Reg. 20496, 2054. Nothing like that occurred here.

USAG Fort Carson's Response #19: The comments received on the FY2017 Annual Report, as well as the PA amendments, were discussed at the December 5, 2017, meeting at which representatives from the Otero County Board of Commissioners, Colorado Council of Professional Archaeologists, Colorado Preservation, Inc., and SHPO were present either in-person or on the conference line. Any outstanding issues or concerns from Otero County Board of Commissioners or Colorado Council of Professional Archaeologists were resolved during the meeting. This is one of the purposes of the annual meeting. The meeting summary and slide presentation were forwarded to the SHPO, Native American Tribes, and other consulting and interested parties on January 8, 2018.

N1MAI's Comment #20: *In enclosure 1, Army falsely claims credit for “NEPA reviews” for various undertakings such as for Army’s conversion of a Fort Carson infantry brigade training at Piñon Canyon Maneuver Site to an armored brigade and for prescribed burns.*

No publicly available NEPA reviews pertaining to PCMS were conducted for these projects. Army merely prepared some paperwork, called Records of Environmental Consideration, (“REC”), which is not a NEPA review, but rather an internal Army review attempting to justify why it did not do a NEPA review. 32 C.F.R. §651.19. More accurately, a REC is a list of bureaucratic excuses for not doing a NEPA review. It is done without public notice, without acceptance of any public input or public disclosure of the supposed result. If there is any consideration of less environmentally damaging alternatives, it is anyone’s guess, but in the absence of any public scrutiny, it is very doubtful.

Army did prepare a Programmatic Environmental Assessment (“PEA”) on the conversion of an infantry brigade to an armored brigade – portending huge additional training impacts to PCMS – but did not consider, disclose or take public comments on impacts to PCMS, finding these impacts purportedly covered by the 2015 PCMS Training & Operations EIS. Ironically, the PEA did assess effects on Fort Carson and all other military bases considered as potential sites for a new armored brigade – only PCMS was omitted from the analysis.

Army did not review site-specific impacts in the 2015 Environmental Impact Statement (“EIS”). That EIS covered the entire large expanse of PCMS generally omitting significant required data. And, Fort Carson / IMCOM / Army did not and does not prepare Environmental Assessments for subsequent brigade exercises or other site-specific uses. Army admits, for example, that no NEPA review was done for the 2014 Programmatic Agreement amendments considered and adopted this year despite public interest and controversy in light of Army’s poor track record with respect to cultural resources. As a result, Army never considers site-specific impacts, or consequently, site-specific mitigation, as required by the National Environmental Policy Act, a law of the United States of America.

The most fundamental principle underlying NEPA is that an agency must “look before it leaps.” Instead, in line with its absurd decision to conduct military training and operations on fragile shortgrass soils at the headwinds of the Dust Bowl, Army habitually “leaps before it looks.” Laws demanding public disclosure and rigorous scientific analysis of the impacts of Army’s plans are collateral damage in Army’s campaign to delude the public about the severe regional consequences Army and its contractors are stacking up -- site by site -- at Piñon Canyon Maneuver Site.

This is doubly significant because a recent National Historic Preservation Act undertaking for proposed dam construction at multiple locations and other bank stabilizations projects failed to include site-specific descriptions of the proposed work, making site-specific proposed mitigation under the NHPA impossible to achieve.

USAG Fort Carson’s Response #20: As described in the letter from Fort Carson dated February 20, 2019 to N1MA! in response to a similar NEPA comments, see page 2.

Use of a Record of Environmental Consideration (REC) to document the training of a second Stryker Brigade Combat Team (SBCT) at PCMS is appropriate. The training of a SBCT was analyzed in the 2015 PCMS Training and Operations Final EIS and the Record of Decision limits mechanized maneuver training to 4.7 months, which includes the lesser impacts generated from a SBCT. The REC that outlines the findings is available as an attachment to the 2018 PEA and FNSI for the Infantry Brigade Combat Team to Armored Brigade Combat Team Conversion on the Fort Carson NEPA webpage at <https://www.carson.army.mil/organizations/dpw.html#three>.

The projects described as dam construction and bank stabilization are land rehabilitation activities routinely conducted by USAG Fort Carson. These proposed activities are categorical exclusions (CXs) per NEPA regulation (32 CFR 651.55) and generally analyzed in the EA completed for the Integrated Natural Resources Management Plan. Site specific project reviews are completed as part of the internal USAG Fort Carson NEPA CX analysis, a part of that process is the NHPA Section 106 and Section 404 reviews.

N1MA!’s Comment #21: *The Army’s Installation Natural Resource Management Plan is now a year out of date and is thus not in compliance with the Sikes Act. 16 U.S.C. §670a(b)(2). Thus, again, the effect of the National Historic Preservation Act violations is amplified by accumulating and overlapping simultaneous violations of other environmental laws by Army including the National Environmental Policy Act and the Sikes Act.*

USAG Fort Carson’s Response #21: As described in the letter from Fort Carson dated February 20, 2019 to N1MA! in response to a similar Sikes Act comment, see page 3. The INRMP has been reviewed and signed by all signatories in April 2015 to indicate approval of the plan until 2020.

N1MA!'s Comment #22: *N1MA! also objects to the scheduling of the Annual Cultural Resources Consultation Meeting on Jan. 26 at Fort Carson. A militarized, secured Army base is not a "public" location, and is certainly not a welcoming environment for interested parties to attend and provide unvarnished comments. Army has used this ploy in the past, and it is just another means Army uses to dissuade and dismiss public comment and avoid true "consultation" under the NHPA.*

USAG Fort Carson's Response #22: Your comment is noted. Please note the meeting was scheduled for January 16 not January 26, 2019. Those unable to attend in person may call in using the provided conference line information.

In 2015, the annual meeting was held at a public library in Pueblo, Colorado, in an effort to facilitate attendance at the meeting. It was decided to move the venue back to Fort Carson based on the recommendation of the SHPO and others. In addition, having the meeting in one of the conference rooms at Fort Carson allows for others to participate via teleconference, enabling more people to attend.

Access onto Fort Carson without an escort simply requires valid government identification, up-to-date vehicle registration and insurance, and a clean criminal record. Otherwise, an individual must be escorted by a person who is a Department of Defense employee or in current military service.

N1MA!'s Comment #23: *Finally, should Army respond to this letter by sending a letter dismissing each of these concerns, as it has in the past, please be advised in advance that N1MA! rejects such a response, does not regard such a letter as valid "consultation" under NHPA 36 C.F.R. §800.14(f), 63 Fed. Reg. 20496, 2054, and, in the event N1MA! elects not to file a further written response thereafter, it should not be deemed or characterized as "accepting" or "agreeing to" or "satisfied by" such a response.*

USAG Fort Carson's Response #23: We disagree with N1MA!'s comment #23. As noted previously, our responses are well-researched and accurate. Regarding the federal authorities that you reference in your comment, we note that 36 CFR 800.14(f) is not applicable to N1MA! because it concerns consultation with Indian tribes and Native Hawaiian organizations. With regards to 63 Fed. Reg. 20496, we assume the page reference is to page 20504 versus 2054, and we note that the Army is in compliance with the consultation requirements in the NHPA as well as in 63 Fed. Reg. 20496.

ENCLOSURE 5:
CONSULTING PARTY CORRESPONDENCE ON 3ABCT “IRON STRIKE” TRAINING EXERCISE
AFTER ACTION REPORT



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

Carlos Rivero-deAguilar
Chief, Environmental Division
US Army Installation Management Command
Directorate of Public Works
1626 Evans Street, BLDG 1219
Fort Carson, CO 80913-4143

FEB 06 2019

Re: Fort Carson Cultural Resources Management Program 3rd Armored Brigade Combat Team (3ABCT) "Iron Strike" Training Exercise, Piñon Canyon Maneuver Site (PCMS), August-September 2018 (HC#75463)

Dear Mr. Rivero-deAguilar:

Thank you for your correspondence dated 14 January 2019 and received by our office on 16 January 2019 continuing consultation concerning the effects to historic properties of the 2018 3rd 3ABCT training exercise at PCMS in compliance with Stipulation IV.B of the *Programmatic Agreement among US Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Military Training and Operational Support Activities at the Pinion Canyon Maneuver Site, Fort Carson, Colorado*. Initial notification of protected property boundary breaches was provided via a series of emails between 31 August 2018 and 16 October 2018 as per Stipulation IV.C of this agreement.

After review of the documentation provided, we note that our office has previously provided concurrence on 66 of the 73 sites for which we received Colorado Cultural Resource Re-Visitation Forms (OAHIP Form 1405). Your letter requested concurrence on eligibility determinations for seven sites, 5LA.2349, 5LA.2788, 5LA.5626, 5LA.9462, 5LA.9772, 5LA.9807, and 5LA.13523, but we require Data Management (OAHIP 1400) and the appropriate component forms in order to provide concurrence on revised eligibility determinations. Please resubmit the documentation for these sites in the required format so that we may assess the new eligibility determinations in the context of all the available information.

With regard to your assessment of adverse effects, we *concur* with your finding that the 2018 3ABCT training exercise as well as previous brigade training exercises have had an *adverse effect* [36 CFR 800.5(d)(2)] to historic properties at sites 5LA.2320, 5LA.3411, 5LA.5283, 5LA.5612, 5LA.7471, 5LA.8094, 5LA.8309, 5LA.8694, 5LA.9187, 5LA.10922, and 5LA.12581 (n=11).

We also *concur* with your finding that the 2018 3ABCT brigade training exercise specifically has had *no adverse effect* [36 CFR 800.5(d)(1)] to historic properties at sites 5LA.2403, 5LA.3129, 5LA.3387, 5LA.5442, and 5LA.9188 (n=5).

And finally, we *concur* with your finding that the 2018 3ABCT brigade training exercise specifically has resulted in *no historic properties* [36 CFR 800.4(d)(1)] at site 5LA.6001 (n=1).

We *do not concur* with your finding for the remaining 56 sites. Our reasoning is as follows:

- Sites 5LA.2240, 5LA.3302, 5LA.3421, 5LA.3547, 5LA.4991, 5LA.5243, 5LA.5269, 5LA.5433, 5LA.5676, 5LA.5698, 5LA.6125, 5LA.7341, 5LA.8689, 5LA.9186, 5LA.9281, 5LA.9462, 5LA.9703, 5LA.9772, 5LA.12254, 5LA.12496, and 5LA.13523 have been repeatedly impacted,



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and we believe that when viewed holistically, use of PCMS for military trainings may have resulted in cumulative adverse effects to these sites (n=21).

- Sites 5LA.2349, 5LA.5613, 5LA.9807, and 5LA.10930 need additional data for various reasons and we suggest that any impact may cause an adverse effect to these sites until further information is gathered (n=4).
- Sites 5LA.3491, 5LA.5235, 5LA.9771, and 5LA.12596 were improperly or incompletely marked by USAG Fort Carson, which may have resulted in adverse effects to these sites due to neglect (n=4).
- Sites 5LA.2368, 5LA.3144, 5LA.3160, 5LA.3322, 5LA.3384, 5LA.3420, 5LA.3427, 5LA.3429, 5LA.3475, 5LA.5350, 5LA.9029, 5LA.9043, 5LA.9044, 5LA.10925, and 5LA.12605 were marked with Seibert markers, perimeter fencing, or some combination thereof. These markers were ignored during the training exercises, which may have resulted in adverse effects to these sites (n=15).
- Sites 5LA.2610, 5LA.2788, 5LA.3517, 5LA.4400, 5LA.5239, 5LA.5256, 5LA.5375, 5LA.5391, 5LA.5552, 5LA.5626, 5LA.5830, and 5LA.6101 are all located within areas designated for dismounted training only. These dismounted areas were designated as such due to the presence of significant archaeological deposits and as a result of the fact that vehicular travel is only allowed on approved access corridors, many of the sites do not have physical protection measures in place and may have been adversely effected (n=12).

Additional discussion is warranted regarding the concept of cumulative effects and the direction of US Army Garrison Fort Carson (USAG) mitigation on PCMS. While cumulative effects are not directly defined within 36 CFR 800, the implementing regulation of Section 106 of the National Historic Preservation Act, the Council of Environmental Quality provides an analogous definition of "cumulative impacts" that is useful when we consider USAG's mechanized training within PCMS. As per 40 CFR 1508.7, "cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time".

We certainly appreciate USAG's efforts to avoid and minimize adverse effects to historic properties (aka protected properties) that are located within the "training box" within PCMS. However recent discussions between USAG and SHPO staff suggest that "flag and avoid" may not work within such a dynamic training landscape. The effectiveness of using Seibert Markers to delineate protected property boundaries is greatly diminished in night training scenarios when lights or map displays that show off-limit areas where protected properties are not available. This is not surprising when we consider the type and intensity of mechanized training that is currently in use during brigade rotations and it strongly suggests that USAG needs to consider alternatives. For example, we encourage USAG to consider mitigation approaches that were initially discussed during the development of the PCMS training PA that would mitigate effects to all protected properties that are located within areas that are not feasible for long-term protection and preservation. This approach may limit overall program cost and improve



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training by effectively "clearing" the "training box" of significant properties similar in practice to the large reservoir projects of the last century.

We look forward to continued consultation on eligibility assessments, findings of effect, and measures to mitigate the adverse effects. To this end, we suggest that it may be appropriate to draft either a Memorandum of Agreement (MOA) to address adverse effects to these specific sites or a Programmatic Agreement (PA) to address the adverse effects of military use of PCMS more broadly. We request that USAG Fort Carson schedule a meeting among all parties who will be signatories to an MOA or PA as soon as possible in order to have the adverse effects of the 3ABCT brigade training mitigated before additional adverse effects occur as a result of subsequent military training at PCMS.

Thank you for the opportunity to comment. We appreciate the USAG Fort Carson's efforts to prevent continuing adverse effects to the historic properties at PCMS. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



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Site No.	Eligible	Not Eligible	Needs Data	Do Not Concur with Eligibility	Adverse	No Adverse	No Historic Properties Affected	Do Not Concur with Effect	Notes
5LA.2240	x							x	Possible Cumulative Adverse Effects
5LA.2320	x				x				
5LA.2349				x				x	Further Study Needed-- Potential Adverse Effect
5LA.2368	x							x	Markers Ignored -- Potential Adverse Effect
5LA.2403	x					x			
5LA.2610			x					x	Within Dismounted Training Area--Possible Adverse Effect
5LA.2788				x				x	Within Dismounted Training Area --Possible Adverse Effect
5LA.3129	x					x			
5LA.3144	x							x	Markers Ignored --Potential Adverse Effect
5LA.3160	x							x	Markers Ignored --Potential Adverse Effect
5LA.3302	x							x	Possible Cumulative Adverse Effects
5LA.3322	x							x	Markers Ignored --Potential Adverse Effect
5LA.3384	x							x	Markers Ignored--Potential Adverse Effect
5LA.3387	x					x			
5LA.3411	x				x				
5LA.3420	x							x	Markers Ignored --Potential Adverse Effect
5LA.3421	x							x	Possible Cumulative Adverse Effects
5LA.3427	x							x	Markers Ignored--Potential Adverse Effect
5LA.3429	x							x	Markers Ignored --Potential Adverse Effect
5LA.3475	x							x	Markers Ignored--Potential Adverse Effect
5LA.3491	x							x	Improper Marking - Potential Adverse Effect
5LA.3517	x							x	Within Dismounted Training Area --Possible Adverse Effect

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Site No.	Eligible	Not Eligible	Needs Data	Do Not Concur with Eligibility	Adverse	No Adverse	No Historic Properties Affected	Do Not Concur with Effect	Notes
5LA.3547	x							x	Possible Cumulative Adverse Effects
5LA.4400	x							x	Within Dismounted Training Area--Possible Adverse Effect
5LA.4991	x							x	Possible Cumulative Adverse Effects
5LA.5235	x							x	Improper Marking-- Potential Adverse Effect
5LA.5239	x							x	Within Dismounted Training Area--Possible Adverse Effect
5LA.5243	x							x	Possible Cumulative Adverse Effects
5LA.5256								x	Within Dismounted Training Area--Possible Adverse Effect
5LA.5269	x							x	Possible Cumulative Adverse Effects
5LA.5283	x				x				
5LA.5350	x							x	Markers Ignored-- Potential Adverse Effect
5LA.5375			x					x	Within Dismounted Training Area--Possible Adverse Effect
5LA.5391	x							x	Within Dismounted Training Area--Possible Adverse Effect
5LA.5433	x							x	Possible Cumulative Adverse Effects
5LA.5442			x			x			
5LA.5552	x							x	Within Dismounted Training Area--Possible Adverse Effect
5LA.5612	x				x				
5LA.5613	x							x	Further Study Needed-- Potential Adverse Effect
5LA.5626				x				x	Within Dismounted Training Area--Possible Adverse Effect
5LA.5676	x							x	Possible Cumulative Adverse Effects
5LA.5698	x							x	Possible Cumulative Adverse Effects
5LA.5830	x							x	Within Dismounted Training Area--Possible Adverse Effect
5LA.6001		x					x		

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Site No.	Eligible	Not Eligible	Needs Data	Do Not Concur with Eligibility	Adverse	No Adverse	No Historic Properties Affected	Do Not Concur with Effect	Notes
5LA.6101	x							x	Within Dismounted Training Area--Possible Adverse Effect
5LA.6125			x					x	Possible Cumulative Adverse Effects
5LA.7341	x							x	Possible Cumulative Adverse Effects
5LA.7471	x				x				
5LA.8094	x				x				
5LA.8309	x				x				
5LA.8689	x							x	Possible Cumulative Adverse Effects
5LA.8694	x				x				
5LA.9029	x							x	Markers Ignored -- Potential Adverse Effect
5LA.9043	x							x	Markers Ignored--Potential Adverse Effect
5LA.9044	x							x	Markers Ignored --Potential Adverse Effect
5LA.9186	x							x	Possible Cumulative Adverse Effects
5LA.9187	x				x				
5LA.9188	x					x			
5LA.9281	x							x	Possible Cumulative Adverse Effects
5LA.9462				x				x	Possible Cumulative Adverse Effects
5LA.9703	x							x	Possible Cumulative Adverse Effects
5LA.9771	x							x	Improper Marking-- Potential Adverse Effect
5LA.9772				x				x	Possible Cumulative Adverse Effects
5LA.9807				x				x	Further Study Needed-- Potential Adverse Effect
5LA.10922	x				x				
5LA.10925	x							x	Markers Ignored --Potential Adverse Effect
5LA.10930			x					x	Further Study Needed-- Potential Adverse Effect

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Site No.	Eligible	Not Eligible	Needs Data	Do Not Concur with Eligibility	Adverse	No Adverse	No Historic Properties Affected	Do Not Concur with Effect	Notes
5LA.12254			x					x	Possible Cumulative Adverse Effects
5LA.12496			x					x	Possible Cumulative Adverse Effects
5LA.12581	x				x				
5LA.12596	x							x	Improper Marking—Potential Adverse Effect
5LA.12605	x							x	Markers Ignored—Potential Adverse Effect
5LA.13523				x				x	Possible Cumulative Adverse Effects

February 20, 2019

VIA EMAIL (jennifer.r.kolise.civ@mail.mil)

Jennifer Kolise
Cultural Resource Manager
U.S. Army Installation Command, Public Works
1626 Evans St., Bldg, 1219
Fort Carson, CO 80913-4143

Re: Comments on Iron Strike Cultural Resources After Action Report

Dear Ms. Kolise:

On behalf of Not 1 More Acre! (N1MA!), these comments are submitted on the cultural resources After Action Report (AAR) sent January 14, 2019, concerning the Iron Strike Training Exercise at Piñon Canyon Maneuver Site (PCMS) in August and September 2018 by the 3rd Armored Brigade Combat Team, 4th Infantry Division (3 / 4 ABCT).

It is apparent from the latest report that the Iron Strike exercise had devastating new effects on already ruined cultural and environmental resources at PCMS, caused by Army repeatedly running over historic properties eligible for listing on the National Register of Historic Places with multi-ton Abrams, Bradley tracked fighting vehicles, fuel tankers, and other military equipment.

Overall, the Iron Strike Cultural Resources After Action Report demonstrates a large number of significant new cultural resources violations with adverse effects at PCMS, following upon a thirty-five-year history of prior similar violations which remain unresolved. Fort Carson and IMCOM's cultural and environmental management programs are directionless bureaucracies—producing thousands of pages of meaningless analysis at huge cost to taxpayers while flaunting the requirements of public disclosure and environmental and cultural laws including the Sikes Act, the National Environmental Policy Act, and the National Historic Preservation Act.

Termination of Programmatic Agreement. Prior to the Iron Strike exercise, N1MA! repeatedly called for termination of the 2014 cultural resources Programmatic Agreement for training and operations at PCMS (2014 PA) under 36 C.F.R. §800.14(b)(2)(iv) and Stipulation VII.E of the 2014 PA. The latest After Action Report demonstrates, once again, why such a step is necessary and should be taken without further delay.

New Environmental Studies. Prior to the Iron Strike exercise, N1MA! called for new environmental studies under the National Environmental Policy Act (NEPA) because the 2015 Training and Operations Environmental Impact Statement (T&O EIS) assumed that Army would comply with the 2014 Programmatic Agreement and other environmental regulations allegedly established to mitigate harm. That assumption has proved not true, and the latest AAR demonstrates, once again, why such a step is necessary without further delay.

Whether future cultural resources studies at PCMS are done pursuant to Section 106 of the National Historic Preservation Act (NHPA) or the 2014 Programmatic Agreement, the After Action Report vividly demonstrates several truths that must be taken into account:

- 1) Seibert stakes are not, and never could be, sufficient to prevent multi-ton tanks, fighting vehicles, and other military equipment from intruding upon and damaging protected historic properties.
- 2) So-called administrative protections, like the paperwork creation of “dismount-only zones,” do not provide meaningful protection for historic properties and do not substitute for adequate study of the more than 500 PCMS sites that remain unsurveyed.
- 3) Cumulative impacts from repeat violations have occurred, and will inevitably continue to occur, multiplying lasting and ongoing destruction, and must be addressed in a systematic fashion.
- 4) Historically, southeastern Colorado lies in the headwinds of the Dust Bowl of the 1930s. Cumulative and irreparable impacts to cultural resources, shortgrass prairie ecosystems, and regional air quality through deep rutting, sod busting, and destruction of soil cover are caused by military use of Piñon Canyon Maneuver Site. Ninety percent of the shortgrass plant standing biomass is underground. Wet or dry, heavy trucks, armored vehicles, and other military equipment tear up these root systems and destroy them—forming ruts as deep as 32 to 36 inches. The sod structure of plants in this erodible environment is what holds soil in place, allows for more extensive soil resilience during drought, and resists invasive species. The climate at PCMS makes bare soil extremely vulnerable to the effects of drought and wind erosion (Attachment 1), twin conditions that set the stage for the American Dust Bowl when topsoil exposed following agricultural plowing resulted in severe dust storms that caused catastrophic ecological damage across the Southern Great Plains. The epicenter of Dust Bowl impact is generally considered to be the Boise City, Oklahoma area, 200 miles ESE (downwind) of PCMS. The recurrent droughts and the heavy ravages already dealt to 236,000-acre PCMS guarantee the return of dust storms that were this nation’s worst environmental catastrophe. Where are the data for bare soil exposure? Where are any data for wind erosion and atmospheric

particulate matter that are produced by military use and high wind events at PCMS?

- 5) The destruction wreaked on PCMS cannot be mitigated while the site continues to be bombarded and polluted by military use. Continued military use can only dig the hole deeper at PCMS and guarantee severe regional consequences for communities in New Mexico, Oklahoma, Kansas, and Texas. DOD, its contractors, and politicians know and ignore these facts while undermining N1MA!'s victories in the state legislature, the federal court, and Congress meant to stop the destruction of our land, our communities, our lives, our values.
- 6) At this late date, Army's proposed "Way Forward" in the After Action Report involving more of the same failed measures is patently ludicrous.
- 7) When an incident involving attempts at compliance by an Army officer in establishing a tactical operations site is deemed by Army an especially notable "Success Story" (AAR 5), it is clear that Army non-compliance in the future ought to be presumed and expected. During the same exercise, another tactical operations site was inappropriately established adjacent to a Seibert stake, a "Failure Story" Army downplayed in the fine print (5LA03420, E-158). A 50 percent failure rate for "cultural resources education" is hardly a "success," especially when a single violation involving multi-ton vehicles causes irreparable harm.
- 8) Even more pathetic, it now appears cultural resources staff members are themselves contributing to the damage by improperly entering protected properties with vehicles (5LA03517 E-188).

Violations of Programmatic Agreement

The AAR documents a dreary toll of violations of the 2014 PA, showing after a long series of similar violations that Army is incapable of complying or unwilling to take the necessary steps to do so:

- 1) **55 violations documented by AAR: 2014 PA II.B.** (During the implementation of an exempted undertaking, vehicles and aviation assets are not permitted within the perimeter of protected properties, listed in Appendix 2, except for travel on existing roads which may traverse through sites.)

According to the AAR, 44 of these wrongfully entered sites are eligible for listing on the National Register of Historic Places, and the eligibility of at least four others is still in dispute (AAR 3). At several of them, protected historic features were directly run over by Army tanks or other military equipment (5LA03421, E-168, 5LA05613 E-359, 5LA12481, E624, 625).

2) **55 violations documented by AAR: 2014 PA III.C.** (Except for the purposes of immediate rescue and salvage operations conducted to preserve life and property, no vehicle of any kind may be operated within the perimeter of protected properties.)

3) **Violation Entire Exercise, 2014 PA III.D.** (USAG shall provide training aircraft and vehicles that are equipped with a Global Positioning System a means of knowing the locations of protected properties, to indicate training constraints located within their training footprint. USAG shall implement these measures within one year of the last authorizing signature on this Agreement.)

The AAR says: “The PCMS Resources Protection Map was created for loading into the BFS systems, but the map was not loaded.” The 2014 PA specifically requires “implementation” of these measures and as long ago as 2017 Army was claiming this task was “completed.” Clearly, it was not.

4) **19 Violations, 2014 PA II.A.** (Exempted undertakings, as listed in Appendix 1, require no further consultation under Section 106 of the NHPA.)

Vehicle entries into protected properties in lettered training zones designated “dismount only” zones are not exempt activities, and yet no advance Section 106 consultation occurred before these 19 sites were improperly entered by tanks and other fighting vehicles.

5) **19 Violations, 2014 PA I.B., III.A.4.** (USAG shall complete documentation of needs data resources, if not identified for potential adverse effects or **not protected** by one of the protection measures identified in Stipulation III.A., and submit this data to SHPO within three years of the last authorizing signature on this Agreement.)(Administrative protective measures defined as a policy that **provides protection** to one or more properties)(emphasis added).

The latest Annual Report shows 555 “needs data” sites on PCMS, and clearly so-called administrative protections are not working. Administrative measures only suffice under the 2014 PA if they actually “provide protection.” They clearly don’t.

6) **2 Violations, 2014 PA IV.B.** (Following each brigade maneuver exercise USAG shall inspect all protected properties within the exercise area established for the training. The inspection will occur within 90 calendar days following the exercise. For protected properties impacted by training, ... USAG will consult with SHPO, Tribes, and Parties, as necessary to resolve for adverse effects in accordance with 36 CFR §800.6(b).)

The AAR was not distributed until Jan. 14, 2019, weeks after the 90 days required by the 2014 PA. Additionally, the AAR concedes that only 355 protected sites were inspected, AAR p.2, although approximately 1,200 were present within

the established Area of Potential Effects. The violations found are thus likely substantially understated.

The 2014 PA specifies that “all protected properties within the exercise area established for the training shall be inspected.” By its terms it does not allow “guesstimates” of the area affected by military training and operations—especially where the undisputed evidence shows such widespread disregard of established cultural resources boundaries.

7) 2 Violations, 2014 PA II.C. (Exempted activities will not occur on unsurveyed land, except for foot traffic and aviation overflight.) The AAR shows they did (5LA0375)(5LA09462).

According to the AAR, the former was impacted by “multiple tracked and wheeled vehicles” that caused tracks so numerous and blended in with improper tracking from at least a 2017 exercise that “it was difficult to document all of them individually.” This kind of activity destroys historic properties and artifacts before they can even be documented or attempts made to preserve them.¹

Damage toll piles up. The photodocumentation supplied by Army dramatically shows how Seibert stake markers are completely useless at protecting historic properties on PCMS. N1MA! located 17 photographs where vehicle tracks entered supposedly protected sites even though Seibert markers were adjacent to the vehicle tracks (E-18, 20, 32, 79, 81, 96, 98, 164, 166, 167, 346, 356, 357, 359, 408, 409, 432, 435, 440, 441, 442, 481, 482, 486, 487, 491, 492, 523, 524, 511, 613, 617, 633, 634). The photodocumentation also shows three sites where vehicles ran over Seibert stakes in entering protected sites (E-149, 150, 155, 156, 434, 560, 562, 563, 564). These entries were made, of course, with multi-ton tanks and fighting vehicles with the ability, as the photos show, of crushing bedrock (E-328, 330, 331, 332, 335), ripping up live pinon and juniper trees (E-438), and creating vehicle ruts in the vulnerable softgrass prairie nearly 2 feet deep (e.g., E-439).

¹ At page 4 of the AAR, Army refers to a battalion exercise by 1SCBT that occurred in 2016 during which no protected sites were allegedly entered as an example of how mitigation is purportedly working. There is no publicly available evidence to support Army’s assertion and it is doubtful that whatever occurred in 2016 was documented meaningfully and interpreted truthfully. Under the 2014 PA at VI.A.2, Army is not required to report exempt undertakings such as “batallion exercises” in its annual reports, and it did not do so in 2016. Army has also dodged the requirement to do after-action inspections and reports because the 2014 PA requires these only for brigade-level exercises. Further, Army also apparently avoids NEPA compliance on such “batallion exercises” under a supposed “categorical exclusion” for [d]eployment of military units on a ... training basis where existing facilities are used for their intended purposes consistent with the scope and size of existing mission.” 36 C.F.R. §651 Part B (II)(b)(7). Military presence and operations on fragile shortgrass ecosystems with multi-ton Stryker vehicles are nothing like the type of exercises that don’t normally require environmental analysis as “categorical exclusions.” Army routinely violates NEPA as well as NHPA. Another positive aspect of terminating the 2014 PA is that it will eliminate this kind of destructive “undocumented exercise” conducted by Army.

According to the AAR, 13 sites considered “completely” marked by Seibert stakes and other protections were nevertheless entered by tanks or other equipment, along with 17 sites that were allegedly “partially” marked (AAR 3).

Significant rutting in soft soils admittedly occurred at multiple protected sites throughout the exercise (E-15, 21, 119, 120, 151, 152, 180, 181, 184, 218, 241, 242, 243, 247, 248, 249, 251, 255, 256, 257, 258, 259, 260, 261, 262, 263, 264, 266, 268, 269, 270, 271, 272, 277, 278, 279, 283, 285, 286, 322, 323, 333, 334, 337, 339, 350, 352, 418, 430, 436, 439, 463, 467, 513, 526, 619, 520, 540, 548, 5556, 557, 578, 619).

Since the first military use of PCMS in the early 1980s, when Army condemned the best shortgrass land use and replaced large-acreage family ranching with military use (the worst land use for the shortgrass, an ecosystem that evolved for 10,000 years with bison grazing), cumulative impacts have taken and continue to take a severe toll at the headwinds of the Dust Bowl. The AAR demonstrates that many of the cultural sites impacted were impacted by multiple vehicles during this same exercise. Additionally, according to the AAR, 29 of the sites entered had also been improperly entered during one of the previous five brigade training exercises since 2010, and some of these had been entered more than once (AAR 3). After Action Reports from 1984-2002 (Attachment 2) describe severe cumulative impacts throughout the long decades of Army’s deplorable desecration of shortgrass prairie ecosystems, their long cultural legacy, and paleontologic record.

The extent of the cumulative impacts, current and past, could hardly be clearer from the AAR. For a handful of examples consider:

5LA03411: Eligible for NRHP

Protection Fence & Seibert Markers (partial...)

Numerous tracked and wheeled vehicles crisscrossed the site. Tracks consist of slight rutting (less than 5 cm in depth) with moderate rutting (up to 20 cm in depth) occurring in the pivot turns. The inner site protection fence was breached in addition to the Seibert-marked boundary. More than one tracked vehicle entered this area and performed pivot turns. A tracked vehicle drove over Feature 3 (FCR concentration / hearth) The site was also entered during the 2017 1SBCT Raider Focus II Training Exercise

5LA05612 Eligible for NRHP

Seibert Markers (complete)

Multiple tracked vehicles traversed the site. The

tracks were too numerous to GPS them all. There are numerous pivot turns throughout the site. In the southeastern area, there is an approximate 50-meter by 40-meter area that is heavily disturbed from neutral steers. In this area, sediment disturbance is up to 50 cm in depth. Areas where the tracked vehicles drove over bedrock outcrop resulted in crushed rock. An oil spill occurred on the site after a tank drove over a rock outcrop. At least one feature (Feature 5—bedrock metate) was impacted ... The site was also entered during the 2013 2-4 BCT Warhorse Charge Training Exercise

5LA08309 Eligible for NRHP

Location TA E (dismount only zone) Markers: None

Multiple wheeled and tracked military vehicles entered through the southwestern site boundary from Main Supply Route (MSR) 1B. The vehicles caused light impressions (less than 2 cm in depth) throughout the southwestern corner of the site. At pivot turns, sediment disturbance was up to 20 cm in depth. Feature 5 (spaced-stone circle) was clearly disturbed by the impact. The reported location of Feature 3 (spaced-stone circle) is also in the pathway of the tracks. The reported location of Feature 6 (spaced-stone circle) is within 10 meters of the tracks, and may have been impacted during this exercise ... The site was also entered during the 2015 1SBCT Raider Focus Training Exercise

5LA10922 Eligible for NRHP

Seibert Markers: corners only.

Multiple tracked vehicles traversed the site on a northeast-southwest axis, causing light impressions (less than 2 cm in depth) to severe rutting (up to 30 cm in depth). Features 1 (dugout) and 2 (structure) were both driven over. The deepest ruts are located at Feature 2, crushing and displacing some of the foundation stones. Other tracked vehicles drove single file between the site boundary and the protection boundary, south of the site. These tracks manifest as matted vegetation to light impressions

(less than 2 cm in depth). A wheeled vehicle crossed the western portion of the site on a north-south axis, leaving matted vegetation to light impressions. Historic materials (glass, ceramics, metal cans, door knob, etc.) were observed in and around the tracks

The AAR's photodocumentation shows clearly, as N1MA! has repeatedly warned, that old violations don't just disappear or go away on their own, but rather, in this semiarid environment remain visible and devoid of sod structure that holds the soil in place. (E-23, 24, 192, 208, 209, 210, 211, 212, 213, 221, 222, 223, 274, 315, 317, 374, 375, 454, 494, 495, 496, 497, 507, 508, 509, 510). This reflects the undeniable fact that rutting and other surface-disturbing activities in the locale of PCMS—the headwinds of the Great Dust Bowl of the 1930s—amounts to irreparable damage not only on PCMS, but affecting the entire region.

While these new violations occurred, Army remained in violation of NHPA due to unresolved past NHPA and 2014 PA violations from at least the 2010 Warhorse Rampage exercise, the 2013 Warhorse Charge exercise, the 2015 Raider Focus I exercise, and the 2017 Raider Focus II exercise (AAR 3). As the report shows, a number of sites damaged in these previous exercises were again damaged during Iron Strike (AAR 3).

New violations continue to crop up faster than old ones can be resolved. **Army remains in a perpetual and continuing state of noncompliance with the National Historic Preservation Act.**

When this issue was raised in 2017, all Army could say was “Regrettably, consultation to resolve adverse effects (if any) takes time and cannot usually be completed before the next large-scale exercise.” Army could and must do more than express its regret by ending its use of PCMS.

In the meantime, violations remain on the upswing:

- 2010 Warhorse Rampage – 39 prohibited entries on protected properties.
- 2013 Warhorse Charge – 21 prohibited entries.
- 2015 Raider Focus I – 60 prohibited entries.
- 2017 Raider Focus II – 45 prohibited entries.
- 2018 Iron Strike – 55 prohibited entries.

Army's “Way Forward” in the AAR, incredibly, calls for installation of more Seibert markers and incorporation of cultural resources maps into digital systems (AAR 5, 6). These solutions have been tried before and failed. In fact, Army has falsely claimed in its cultural resources annual reports over the last two years that the digital mapping plan was already completed. It clearly wasn't.

After cultural resources were damaged and destroyed in the 2010 Warhorse Rampage exercise, conducted without a valid Environmental Impact Statement, Army was promising these same measures as the solution to cultural resources issues. In fact, Army said then it would place Seibert markers at “each” NHRP-eligible property, 10 meters apart (p.3). Nine years later, it is clear that many sites are still not protected by Seibert markers; according to the AAR, 12 of the sites entered were not marked at all (AAR 3). The 2017 Annual Report identified more than 800 protected properties that were unprotected by any physical marking.

Even where Seibert stakes were placed, they provide no protection for cultural resources as military tank and fighting vehicle operators drove right by, or over, them. According to the AAR, 13 sites deemed “completely” marked were nevertheless entered (AAR 3).

The AAR also calls for “enhanced” education efforts, but how significant could those be? The photodocumentation shows numerous instances of tank and fighting vehicle tracks passing right by Seibert stakes and Army units even setting up a tactical operations site with significant disturbance adjacent to a Seibert marker (5LA03420, E-158).

At some point, it must be recognized that Army has little motivation or desire to comply with cultural resources laws and protect cultural resources on PCMS but, rather, seeks ineffective half-measures that will inevitably and cumulatively lead to the loss of cultural resources on PCMS, giving Army a freer hand and enlarged territory for training exercises.

This is actually consistent with Army’s declared goal for its cultural resources program, which is not to actually protect those resources, but to use the program as a tool to support its training mission and to “maintain the largest possible area for military training.” FC Reg. 200-1 §9-1a.

The AAR calls for Army compliance with FC Reg. 350-4 and F.C. Reg. 350-10, placing areas marked by Seibert stakes and areas designated “dismount only” as off limits to training vehicles (AAR 4, 5).

However, the AAR fails to note that 350-4 §5.1(b) also requires that dismount only zones are to be protected by “perimeter fencing, protective signs, and the use of ‘Seibert Stakes’”—something that has not been done for a good number of protected sites on the lettered training areas at PCMS. Army’s “Way Forward” apparently only calls for selective compliance with F.C. Reg. 350-4.

Even ignoring Army’s selective reading of its own regulations, the AAR’s hoping for some regulatory compliance at this late date is foolhardy, or merely an attempt by Army to create a false illusion that “something will be done” when in fact nothing will be done, and nothing *can* be done except to stop military use of the land which destruction and contamination of now jeopardizes the entire Southern Great Plains region.

The regulations cited by the AAR were adopted on December 21 and 28, 2010. If these regulations were ever going to be complied with, it surely would have been by the time of the Iron Strike exercise in 2018. Iron Strike was not the first exercise to result in damaged and destroyed cultural resources, or sod busting, or rutting caused by Army's use of this fragile land.

Since these regulations are not being complied with, as the AAR concedes, and there are numerous, continuing, and unresolved violations of the NHPA and 2014 PA, Army grievously errs in relying on the PCMS Training and Operations EIS of 2015 for alleged compliance with the National Environmental Policy Act. That EIS assumed mitigation, such as the cited regulations and programmatic agreement, would prevent significant impacts and did not take into account widespread, open, continuous, unresolved violations that have occurred since the EIS was developed and approved. 32 C.F.R. §651.15(b)(mitigation adopted as part of an EIS must be implemented); 40 C.F.R. §1505.3 (same).

These significant new developments warrant and require preparation by Army of a Supplemental EIS before additional brigade exercises are conducted. 40 C.F.R. §1502.9(c); *Marsh v. Oregon Natural Resources Council*, 490 U.S. 360 (1989).

The Army's performance of a Record of Environmental Consideration (REC) prior to conducting the Iron Strike exercise was not adequate to comply with NEPA. The REC, if it even exists, was not announced or circulated for public comment or review. A REC is not a NEPA document, but rather Army paperwork that attempts to offer lame excuses for not preparing a NEPA document.

The AAR's description of months of preparations before the Iron Strike Exercise is all the more confounding because, despite all this supposed effort, basic tasks like uploading the updated resource map onto the Blue Force Tracker systems were not done.

The AAR's conclusion that Iron Strike caused "adverse effects" at only 10 sites (with a finding of effect on four additional sites withheld) is utterly ridiculous in light of the long list of violations documented at dozens of sites. Under the NHPA, assessment of effects must include both "indirect" and "cumulative" effects (36 C.F.R. §800.5(a)). Effects include any diminishment of "the integrity of the property's location, design, setting, materials, workmanship, feeling, or association" *Id.*

This kind of see-no-evil approach reflects a long pattern by Army under which the "area of potential effects" is narrowly construed, and indirect and cumulative effects are ignored or downplayed in order that Army might prepare good paperwork, regardless of whether cultural resources are meaningfully affected on the ground.

Army's approach is to paper over the problems, but do little or nothing to solve them. The result is the multiple dozens of violations reported in the AAR among a select sample inspected.

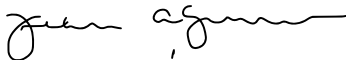
Termination of the 2014 PA here is particularly warranted because the conduct of training maneuvers on PCMS was never properly considered to be eligible for exemption status in the first place.

The effects of military training and operations—especially with destructive Abrams tanks, Bradley Fighting Vehicles, Stryker vehicles, along with Humvees, aviation assets, and other weapons systems—are not and never were “likely to be minimal” under 36 C.F.R. §800.14(c)(1)(ii) when carried out on such a sensitive landscape as PCMS containing such a large number and variety of eligible historic properties.

Finally, should Army respond to this letter by sending a letter dismissing each of these concerns, as it has in the past, please be advised in advance that N1MA! rejects such a response, does not regard such a letter as valid “consultation” under NHPA 36 C.F.R. §800.14(f), 63 Fed.Reg. 20496, 2054, and, in the event N1MA! elects not to file a further written response thereafter, it should not be deemed or characterized as “accepting” or “agreeing to” or “satisfied by” such a response.

It is long past time for Army to stop sending dismissive letters and start making diligent efforts to comply with NHPA, the 2014 PA to the extent it is not terminated, and NEPA.

Sincerely,

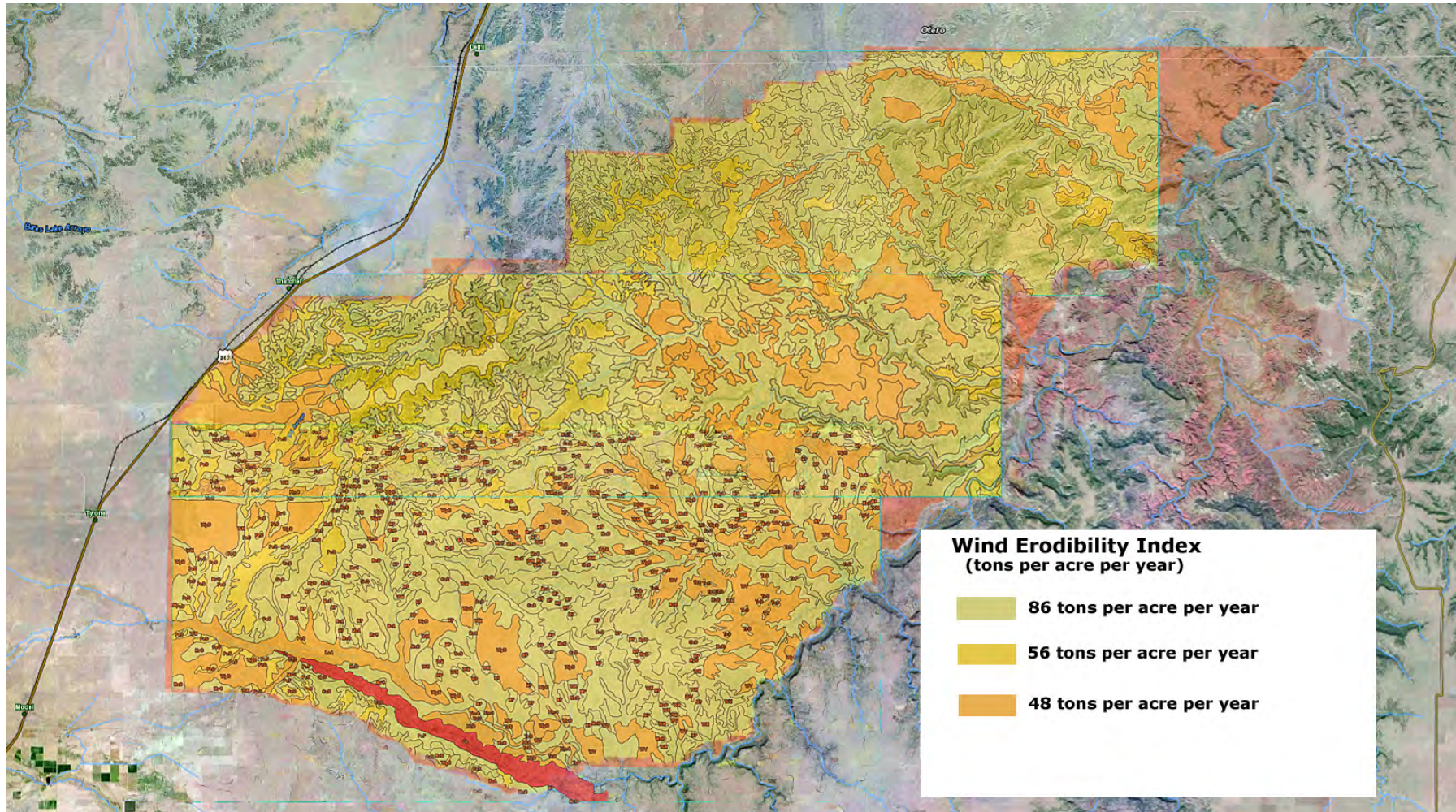
A handwritten signature in black ink, appearing to read 'Jean Aguerre', with a stylized flourish at the end.

Jean Aguerre for Not 1 More Acre!

cc: SHPO
ACHP

USGS soil survey:

"The wind erodibility index is a numerical value indicating the susceptibility of soil to wind erosion, or the tons per acre per year that can be expected to be lost to wind erosion. There is a close correlation between wind erosion and the texture of the surface layer, the size and durability of surface clods, rock fragments, organic matter, and a calcareous reaction. Soil moisture and frozen soil layers also influence wind erosion."



Damages To PCMS Cultural Resources From AARs 1985-2002

From 1985 to 2002, the Army reported in PCMS After-Action Reports that the training damages caused to cultural resources, including archaeological sites, architectural sites, modern ranches with historic significance, rock art, and Native American ceremonial/religious sites have been significant, totally destructive, and unnecessary. The reason given was that “soldiers were not adequately informed or were misinformed about the requirements to avoid standing structures, posted and restricted areas.” In 1987, the Army stated that “the potential for significant future losses to both the cultural resources and the Command’s credibility may result through continuation of these unauthorized activities. From 1991 to 2002, the Army stated that “management efforts will continue which are designed to provide for legal compliance as well as site preservation where applicable.” Unfortunately, in spite of Army rhetoric, vehicular intrusions into off-limits, restricted areas, continued to cause these unnecessary damages for 17 years as reported by the Army in After-Action Reports from 1985 to 2002.

In 1985, the Army reported that “virtually all significant sites, i.e. sites marked on training map overlays, posted (signed) and/or consisting of standing structures experienced some level of direct impact from tracked and/or wheeled vehicles.”

In 1986, the Army reported that cultural sites “sustained impacts from military training;” “several damaged artifacts were noted in the disturbed areas so damage is considered significant;” “posts and signs marking the site were removed;” and “the Historical Middlecamp Ranch was observed to have vehicle tracks within some 15 feet of the structure, thereby potentially displacing associated cultural remains.”

In 1987, the Army reported that “a prehistoric boulder petroglyph site was impacted;” “a rock shelter with bedrock mutates and historical rock in Welsh Canyon was also impacted;” “the full effects of impacts on unrecorded and undocumented sites in management unit D may not be known until sometime in the future;” “(lock turns) or wet conditions impacts tend to occur to a greater depth and may have direct impacts on the integrity of surface and subsurface deposits;” “of the 46 marked as restricted sites (off-limits signs, fence or white engineer tape encircled) within training areas C, D and E, 44% (N=20) demonstrated varying degrees of tactical vehicle traffic within the delineated protected area;” “intrusions varied from a few vehicle tracks within the perimeter to establishment of parallel tracked vehicle access routes through the centerline of two major sites within Red Rock Arroyo;” “site protective markings were removed (partially or totally) from several sites either through direct vehicle impact, personnel action utilizing same for construction of individual fighting positions and intentional destruction of approximately one fourth of a mile of marked fenceline which was removed by a single M60A3 driving through its length;” “the most significant impacts occurred ... where sites tend to be fairly large in scope, of high density, and of overall increased cultural importance;” and “of particular note as relative concern with overall cultural resource protection was the increased

(over previous rotations) utilization of previously unsurveyed off-limits areas for tactical vehicle travel.” The Army stated that “the potential for significant future losses to both the cultural resources and the Command’s credibility may result through continuation of these unauthorized activities.”

In 1988, the Army stated that “there was some vehicle intrusion into signed off limits areas;” “a total of six different sites experienced varying degrees of damage resulting by vehicle intrusions;” “some stone buildings on the PCMS were impacted by vehicles within the 100-meter restricted area and around standing structures ... and these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near the structures;” “removal of signs and/or fence posts—several of the sites are missing signs and/or posts;” “use of building materials from standing structures within the PCMS;” and “the most significant impacts will probably be due to soil erosion and compaction adjacent to sites.”

In 1989, the Army reported that “there was limited vehicle intrusion into signed off-limits areas;” “a total of nineteen (19) different sites experienced varying degrees of damage resulting because of vehicle intrusions;” “several stone buildings and several historic building sites on the PCMS were impacted by vehicles within the 100-meter restricted area around standing structures” and “these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near these structures;” “removal of signs and/or fence posts—several of the sites are missing signs and/or post,” and “these sites demonstrated where vehicles ran over the post and sign as evidenced by tracks on either side of the bent over post;” “use of building materials from standing structures within the PCMS;” and “the most significant impacts yet to be determined will probably be due to soil erosion and compaction adjacent to sites.”

In 1990, the Army reported that “there was limited vehicle intrusion into signed off-limits areas;” “a total of three (3) different sites experienced varying degrees of vehicle intrusions;” “several historic building sites on the PCMS were impacted by vehicles within the 100-meter restricted area around standing structures;” “these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near these structures;” and “the most significant impacts yet to be determined will probably result due to soil erosion and compaction adjacent to sites.”

In 1991, the Army reported that “within the BSA, a historic vintage feed trough was burnt as fuelwood” and “this relic of the past enjoyed protected status which was disregarded;” “a total of eleven (11) different sites experienced varying degrees of vehicle intrusions;” “two of the intrusions were considered to result in significant damage;” “several historic building sites on the PCMS were impacted by vehicles within the 100-meter restricted area around standing structures;” “these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near these structures;” “the most significant impacts yet to be determined will probably result due to soil erosion or compaction adjacent to

sites and vandalism;" and "management efforts will continue which are designed to provide for legal compliance as well as site preservation where applicable."

[No After-Action Report For 1992]

In 1993, the Army reported that "a total of four (4) different sites experienced varying degrees of impact resulting because of vehicle intrusions;" "several historic building sites" and "only the buffer areas of two historic building sites on the PCMS were impacted by vehicles within the 100-meter restricted area around standing structures;" "these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near these structures;" "the windmill (>70 years old) was accidentally destroyed while executing a 'hasty retreat' during a snow storm" and "it was contributory to the overall cultural importance of this historic homestead;" "the most significant impacts yet to be determined will probably result due to soil erosion and compaction adjacent to sites and vandalism;" and "management efforts will continue which are designed to provide for legal compliance as well as site preservation where applicable."

In 1994, the Army reported "a total of five (5) different sites experienced varying degrees of impact resulting because of vehicle intrusions;" "only the buffer areas of two historic building sites on the PCMS were impacted by vehicles within the 100-meter restricted area around standing structures;" "these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near these structures;" and "the most significant impacts yet to be determined will probably result due to soil erosion and compaction adjacent to sites and vandalism."

In 1995, the Army reported that "of concern and more pronounced this rotation than during several of the recent past was resource-damaging vehicle intrusion into signed off-limits cultural resource sites;" "a total of six (6) different sites ... experienced varying degrees of impact resulting because of vehicle intrusions;" "intrusions through two sites ... were considered to result in significant damage if not destruction of the cultural significance of these sites;" "several historic building sites on the PCMS were impacted by vehicles within the 100-meter restricted area around standing structures;" "these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near these structures;" and "the most significant impacts yet to be determined will probably result due to soil erosion and compaction adjacent to sites and vandalism."

In 1996, the Army reported that "of concern and more pronounced this rotation than during several of the recent past was resource-damaging vehicle intrusion into signed off-limits cultural resource sites;" "a total of twelve (12) different sites experienced varying degrees of impact resulting because of vehicle intrusions;" "intrusions through one site located east of Brown Sheep Camp (Pig Farm) were considered to result in significant damage if not destruction of the cultural significance of this site;" "additional survey will be necessary in order to adequately identify the extent of the potential loss;" "several historical buildings sites on the

PCMS were impacted by vehicles within the 100-meter restricted area around standing structures;" "these sites often contain historical or archaeological potential which is compromised by the disruption of the soil surface near these structures;" "the most significant impacts yet to be determined will probably result due to soil erosion and compaction adjacent to sites and vandalism;" and "management efforts will continue which are designed to provide for legal compliance as well as site preservation where applicable."

In 1997, the Army reported that "two (2) signed cultural resource sites were impacted in varying degrees by military maneuvers," "in each instance, the damage was caused by vehicular intrusions;" "the most significant impacts yet to be determined will probably result from soil erosion and compaction adjacent to sites;" and "management efforts will continue which are designed to provide for legal compliance as well as site preservation where applicable."

In 1998, the Army reported that "two (2) cultural resource sites were lightly impacted by military maneuvers" and "the damage was caused by vehicular intrusions;" "the most significant impacts yet to be determined will probably result from soil erosion and compaction adjacent to sites and vandalism;" and "management efforts will continue which are designed to provide for legal compliance as well as site preservation where applicable."

In 1999, the Army reported that "seven (7) cultural resource sites were impacted by military maneuvers;" "four of these sites received potentially significant damage;" "all resulting damage was caused by vehicular intrusions through, adjacent to, and/or on the site features;" "the most significant impacts yet to be determined will probably result from soil erosion and compaction adjacent to sites;" and "management efforts will continue which are designed to provide for legal compliance as well as site preservation where applicable."

In 2000, the Army reported that "five (5) cultural resource sites were impacted by military maneuvers;" "four of these sites received potentially significant damage;" "all resulting damage was caused by vehicular intrusions through, adjacent to, and/or on the site features;" "sustainment of the current management philosophy for allowing culturally significant sites to remain in their natural context while expending the minimum resources necessary to evaluate rather than collect artifacts is jeopardized with each intrusion into the site;" "due to the nature of these intrusions, initial estimates for accomplishment of training-related mitigation requirements ranged as high as \$245K;" "given the potential impacts to these sites, DECAM elected to accomplish generalized site surveillance/evaluation and soil testing in order to determine the potential for damage to buried deposits," "overall results indicate a low to medium potential for damage to buried deposits," "therefore, additional evaluation will continue but damage-mitigation assessments will be identified for the lower end of the requirement;" "the most significant impacts yet to be determined will most likely result from soil erosion and compaction adjacent to sites;" and "management efforts designed to provide for legal compliance as well as site preservation will continue to be accomplished."

In 2001, the Army reported that “nine (9) cultural resource sites were impacted by military maneuvers during this training rotation to the PCMS,” “two of these sites received significant damage,” and “all resulting damage was caused by vehicular intrusions through, adjacent to, and/or on the site features;” “sustainment of the current management philosophy for allowing culturally significant sites to remain in their natural context while expending the minimum resources necessary to evaluate rather than collect artifacts is jeopardized with each intrusion onto the site;” “due to the nature of these intrusions, initial estimates for accomplishment of training-related mitigation requirements exceeded \$200K;” “given the potential impact to these sites, DECAM elected to accomplish generalized site surveillance/evaluation and soil testing in order to determine the potential for damage to buried deposits;” “overall results indicate a low to medium potential for damage to buried deposits ... therefore, additional evaluation will continue but damage-mitigation assessments were identified for the lower end of the requirement;” “the most significant impacts yet to be determined will most likely result from soil erosion and compaction adjacent to sites;” and “management efforts designed to provide for legal compliance as well as site preservation will continue to be accomplished.”

In 2002, the Army reported that “seven (7) cultural resource sites were impacted by military maneuvers;” “two of these sites received potentially significant damage;” “all resulting damage was caused by vehicular intrusions through, adjacent to, and/or on the site features;” “sustainment of the current management philosophy for allowing culturally significant sites to remain in their natural context while expending the minimum resources necessary to evaluate rather than collect artifacts is jeopardized with each intrusion onto the site;” “due to the nature of these intrusions, initial estimates for accomplishment of training-related mitigation requirements ranged as high as \$75K;” “given the potential impact to these sites, DECAM elected to accomplish generalized site surveillance/evaluation and soil testing in order to determine the potential for damage to buried deposits;” “overall results indicate a low to medium potential for damage to buried deposits ... therefore, additional evaluation will continue but damage-mitigation assessments will be identified for the lower end of the requirement;” “the most significant impacts yet to be determined will most likely results from soil erosion and compaction adjacent to sites;” and “management efforts designed to provide for legal compliance as well as site preservation will continue to be accomplished.”
