

The following presents the Fiscal Year (FY) 2020 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 (88 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 (67 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 (94 pages)*

**FISCAL YEAR (FY) 2020 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, 2020**

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, 2019, through September 30, 2020, and is formatted in accordance with Appendix D. It only discusses the areas of potential effects (APEs) covered by the Fort Carson Built Environment PA. 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, 2019, and September 30, 2020. Two hundred 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 reviewed undertakings that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) during the reporting period. Eight undertakings required Section 106 consultation. Section 106 consultation has been completed for five undertakings (2020-048, 2020-096, 2020-104, 2020-121, and 2020-143/158). Consultation is ongoing for two undertakings (2020-054/073/308 and 2020-221). Consultation has not been initiated for one undertaking (2020-010).

The following is an update to the status of Section 106 consultation continuing from the fiscal year 2019 reporting period:

- 2019-141 Replace Non-Portable Waterline between Bldg. 9302 & 9313: Section 106 consultation has not been initiated; project is on hold.
- 2019-259 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS: See Table 2 in Enclosure 1, NEPA Project No. 2020-054, 2020-073,

& 2020-309 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS, for the Section 106 consultation status update.

- 2019-321 Operation of the MQ-1C Gray Eagle or Similar Unmanned Aerial System in National Airspace: Due to a change in project scope, another Section 106 undertaking review packet was submitted to the SHPO, Native American Tribes, and other consulting and/or interested parties in January of 2020. USAG Fort Carson determined the undertaking would not have adverse effects to historic properties. The SHPO concurred with the finding of effects via correspondence dated January 27, 2020 (HC #76656) for the revised undertaking. Responses were also received from the City of Colorado Springs, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effects.
- 2019-369 Remove Flight Restrictions over Turkey Creek Ranch: The Section 106 undertaking review packet was submitted to the SHPO, Native American Tribes, and other consulting and/or interested parties in March of 2020. USAG Fort Carson determined the undertaking would not have adverse effects to historic properties. The SHPO concurred with our finding of effects via correspondence dated August 27, 2020 (HC #77616), after additional consultation efforts. Responses were also received from the City of Colorado Springs, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma; all parties agreed with the finding of effects.
- 2019-371 Vegetation Thinning along Installation Perimeter Firebreak, Fort Carson: The Section 106 undertaking review packet was submitted to the SHPO, Native American Tribes, and other consulting and/or interested parties in October of 2019. USAG Fort Carson determined the undertaking would not have adverse effects to historic properties. The SHPO concurred with our finding of effects via correspondence dated November 12, 2019 (HC #76752). Responses were also received from the City of Colorado Springs and Pawnee Nation of Oklahoma; both agreed with the finding of effects.
- 2019-379 Forest Thinning, Camp Falcon and Training Area 5, Fort Carson: The Section 106 undertaking review packet was submitted to the SHPO, Native American Tribes, and other consulting and/or interested parties in November of 2019. USAG Fort Carson determined no historic properties would be effected by the undertaking. The SHPO concurred with our finding of effect via correspondence dated December 18, 2019 (HC #76752). Responses were also received from the City of Colorado Springs and Crow Creek Sioux Tribe; both agreed with the finding of effects.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRMP. These eight 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 September 2020
- 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 January 15, 2020 (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 suggested all “command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis” as that provided to “soldiers at the unit level.” The SHPO emphasized cultural awareness training that targets various audiences would make protection measures more effective.

Enclosure 2 includes the SHPO’s January 15, 2020, letter, and the USAG Fort Carson’s response to the SHPO dated October 30, 2020.

#### *B. Inventory and Survey of the APEs*

An inventory and evaluation of 20 bridges and culverts that are 45 years or older was completed by Sol Solutions, LLC, in response to an undertaking review for 2020-121 (see Table 2 in Enclosure 1). All have been determined ineligible for inclusion in the National Register of Historic Places (NRHP). The SHPO concurred with the determinations of eligibility via correspondence dated October 19, 2020 (HC #78612).

#### *C. Exempted Undertakings*

See Table 1 of Enclosure 1. As of September 30, 2020, 202 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 No. 2019-2650: The wildland fire started on October 16, 2019, with fire suppression activities concluding the same day. Approximately 0.5 acres were burned at Butts Army Airfield near the Foxtrot Ramp. There are no historic properties within the wildland fire footprint.
- Incident No. 2020-00680: The wildland fire started on March 4, 2020, with fire suppression activities concluding the same day. Approximately 10 acres were burned near Ranges 11 and 13. There are no historic properties within the wildland fire footprint.
- Incident No. 2020-00695: The wildland fire started on March 6, 2020, with fire suppression activities concluding the same day. Approximately 134 acres were burned near Ranges 13 and 15. There are no historic properties within the wildland fire footprint.
- Incident No. 2020-00982: The wildland fire started on April 2, 2020, with fire suppression activities concluding the same day. Approximately 0.25 acres were burned ¼-mile south of the intersection of Butts Road and Airfield Road. There are no historic properties within the wildland fire footprint.
- Incident No. 2020-01336: The wildland fire started on May 17, 2020, with fire suppression activities concluding the same day. Approximately 0.10 acres were burned behind Bldg. 9079, 7129 Magrath Ave. There are no historic properties within the wildland fire footprint.
- Incident No. 2020-01367: The wildland fire started on May 20, 2020, with fire suppression activities concluding the same day. Approximately 0.10 acres were burned near 6751 Utah Beach Dr. There are no historic properties within the wildland fire footprint.
- Incident No. 2020-01998: The wildland fire started on July 21, 2020, with fire suppression activities concluding the same day. Approximately 0.50 acres were burned near Gate 6 off Wilderness Rd. and an unnamed tank trail. There are no historic properties within the wildland fire footprint.

### *G. Amendment*

A Third Amendment to the Fort Carson Built Environment PA is being proposed to extend the duration of the PA until December 31, 2022. 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:

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Wayne Thomas  
Chief, NEPA and Cultural Management Branch

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Carlos Rivero-deAguilar  
Chief, Environmental Division

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Hal Alguire  
Director, Public Works

**ENCLOSURE 1:**  
**ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY20 REPORTING PERIOD (OCTOBER 1, 2019, THROUGH SEPTEMBER 30, 2020) 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
2020-001 & 2020-021 Construction of a Special Operations Forces (SOF) Mountaineering Facility	PN81899	Main Post	BE I.A1	10/2/2019 10/11/2019	2020-001 is the review of the 100% design packet; 2020-021 is the final review of the project.  Undertaking has been previously reviewed under NEPA Project No. 2014-504, 2015-217, 2018-292, 2019-027, & 2019-349.
2020-002 Install Mandatory Signs at Alpha 1 and Alpha 2 Taxiways, Butts Army Airfield	BAA17-012	Main Post	BE I.A1	10/3/2019	
2020-004 Repair Crack Seal Joints in Runway 13-31, Butts Army Airfield	BAA19-009	Main Post	BE I.A2	10/3/2019	
2020-005 Replace Metal Shower Stall and Pan, Bldg. 1816	TEN18-016	Main Post	BE I.A2	10/3/2019	2020-005 is an updated NEPA reviews 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 No. 2019-124.
2020-006 Install Electrical Power and Heating, Ventilation, and Air Conditioning (HVAC) Unit in Secure Internet Protocol Router [SIPR] Vault, Room 161, Bldg. 1013	4ID19-015	Main Post	BE I.A2	10/3/2019	
2020-007 Install 10 Communication Ports, Bldg. 2460	4ID17-013	Main Post	BE I.A2	10/3/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-008 Replace Ceiling Tiles, Bldg. 8100	TEN16-047	Main Post	BE I.A2	10/3/2019	2020-008 is an updated NEPA review as it has been over six months since last reviewed.  Undertaking has been previously reviewed under NEPA Project No. 2016-375.
2020-009 Upgrade Railroad Crossing Signals on Wickersham Blvd	DPW19-010	Main Post	BE I.A2	10/4/2019	
2020-011 Remove Cliff Swallow Nest from Bldg. 9472, 9473, & 9474 and Install Bird Netting under Eaves of Bldg. 9471, 9472, 9473, & 9474	DPW19-090	Main Post	BE I.A2 BE I.C2	10/4/2019	
2020-012, 2020-068, 2020-212, & 2020-274 Renovate Room 115, Bldg. 9550, Fort Carson	DPT19-031	Main Post	BE I.A2	10/4/2019 12/12/2019 5/13/2020 8/3/2020	2020-012 is the initial review for the project. Project was cancelled before review was completed. 2020-068, 2020-212, & 2020-274 are updated reviews of the project.  Proposed work includes: creation of seven offices, a break room, and a small conference room; clean existing flooring, lighting fixtures, mechanical room, HVAC system, and duct system; clean and seal ceramic tile and grout in bathrooms; paint walls; and replace damaged receptacles and switches.
2020-013 Install Additional Lighting and Relocate Air Hose, Room 115, Bldg. 9550	DPT19-015	Main Post	BE I.A2	10/4/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-014 & 2020-145 Interior Renovation, Bldg. 1129	DPT18-012	Main Post	BE I.A2	10/4/2019 3/6/2020	Proposed work includes: paint interior; remove paneling and carpeting from walls; repair walls; replace carpeting; replace performing arts stage; and remove and relocate communication ports and install additional electrical outlets in conference room.  2020-014 is the initial review of the project; 2020-145 is an updated review as it has been six months since previous review.
2020-015 Install 100-Amp Power Disconnect, Bldg. 2010, Fort Carson	DPT19-037	Main Post	BE I.A1 BE I.A2	10/4/2019	Proposed work includes tapping into existing transformer and constructing a 100-amp disconnect for a new training device to be installed in the building. The disconnect will be located approximately 50 feet from the transformer.
2020-016 Install Roof Mounted HVAC Cooling Unit, Room 1194, Bldg. 1551	DIR19-010	Main Post	BE I.A2	10/4/2019	
2020-017 Repair Pedestrian Sidewalk between the International Hotel Group (IHG) Candlewood Suites and Elkhorn Conference Center	DPW19-014	Main Post	BE I.A1 BE I.A2 BE I.A3	10/9/2019	Proposed work includes: replacing existing sidewalk and steps with a concrete walkway with Americans with Disabilities Act (ADA)-compliant steps, ramps, lighting, crosswalks, and crossing signage; and demolish portion of existing asphalt parking lot at hotel and grade and reseed.
2020-018 Install Electrical Power for New Sign and Repair Drainage, Bldg. 5506	CIV19-027	Main Post	BE I.A1 BE I.A2 BE I.B2	10/9/2019	The proposed work includes trenching from the building to the bottom of the hill for the installation of electrical power for a new sign, as well as the repairing the flatwork on the west side of the building between the school and playground to address safety and drainage concerns.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-020 Joint Seal Repair, Butts Army Airfield	BAA19-012	Main Post	BE I.A2	10/10/2019	
2020-022 Construction and Operation of a SOF Human Performance Training Center	PN79447 SFG15-017	Main Post	BE I.A1 BE I.A2 BE I.A3	10/11/2019	2020-022 is the final review for the project. Undertaking has been previously reviewed under NEPA Project No. 2015-325, 2015-417, 2016-279, 2016-443, 2018-300, 2019-034, & 2019-348.
2020-025 Construct and Designate Helicopter Landing Zone for 10th SFG, Bldg. 7473	DPW20-022	Main Post	BE I.A1	10/17/2019	
2020-026 Demolish Canopy at Crowsfoot Access Control Point (ACP), Bldg. 9050	DPW20-023	Main Post	BE I.A3	10/18/2019	
2020-027 Replace Alpha Ramp and Alpha West Ramp, Butts Army Airfield	BAA17-007	Main Post	BE I.A1 BE I.A2 BE I.A3	10/21/2019	2020-027 is a review of the site location for the concrete batch plant. Undertaking has been previously reviewed under NEPA Project No. 2018-121, 2018-201, & 2018-246.
2020-028 Install Two Gang Power Outlets, Ventilation Grate, and SIPR Drop, Bldg. 1048	4ID19-014	Main Post	BE I.A2	10/24/2019	
2020-029 Renovate Military Clothing Sales, Bldg. 1510	CIV19-004	Main Post	BE I.A2	10/22/2019	The proposed work includes: polish concrete, install wood laminate flooring, paint walls and add graphics, replace ceiling tiles, and replace interior lighting.
2020-030 Relocation of "13 Air Support Operations Squadron" Lettering from Side to Front, Bldg. 9093	TEN19-027	Main Post	BE I.A2	10/23/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-031 Upgrade Pedestrian Crosswalk to Pedestrian-Activated Flashing Beacons along Wetzel Ave west of Bldg. 1435	DPW19-108	Main Post	BE I.A1 BE I.A2	10/23/2019	
2020-032 Install Army Combat Fitness Training (ACFT) Storage Container, Bldg. 7495 Parking Lot	MED20-001	Main Post	BE I.A1	10/23/2019	
2020-033 Paint Hallways in Waller Gym, Bldg. 2357	1BD20-004	Main Post	BE A.2	10/24/2019	
2020-035, 2020-248, 2020-277, & 2020-290 Renovate Bldg. 7416	SFG19-017 W9128F-19-R-0041 W9128F-19-R-0044 W9128F-20-C-0017	Main Post	BE I.A2	10/25/2019 6/22/2020 8/19/2020 8/25/2020	The project will remodel Bldg. 7416 to provide support spaces to include: restrooms and shower/locker rooms, electrical rooms, mechanical rooms, telecommunication rooms (NIPR and SIPR), janitor's closets, vending areas, recycling storage closet, conference rooms, classrooms, weapons vault, secure storage room, communications equipment storage, and CBRNE equipment storage.  2020-035 is the initial project review. 2020-248 is the review of the 60% design and 100% demolition plan. 2020-277 is the review of the Environmental Protection Plan. 2020-290 is the review of the 100% design.
2020-036 Install Four Data Lines, Bldg. 9646	BAA18-014	Main Post	BE I.A1 BE I.A2	10/31/2019	Proposed work includes directional boring from the northwest corner of Bldg. 9646 to MH0649 and using existing ductwork to install cable to MH0611D for the installation of the data lines.



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-037 & 2020-125 Construction and Operation of a Training Facility, Fort Carson	n/a	Main Post	BE I.A1	11/4/2019 2/21/2020	2020-037 is the review of the lease; 2020-125 is review of the 30% site design.  Undertaking has been previously reviewed under NEPA Project No. 2019-202 & 2019-260.
2020-041 Install Automatic Gate, Bldg. 7472	SFG19-005	Main Post	BE I.A1 BE I.A2	11/7/2019	Proposed work includes the installation of an automatic gate in an existing fence line near Bldg. 7472, as well as the installation of underground electrical line from the building approximately 150 feet to the gate.
2020-043 Repair Burger King's Drive Thru Menu Board, Bldg. 1534	CIV20-002	Main Post	BE I.A2	11/13/2019	Proposed work includes removing the existing board, replacing electrical and communication cables, and installing a new board.
2020-044 Install Water Main Pressure Regulating Valve, Bldg. 510	DPW18-031	Main Post	BE I.A1 BE I.A2	11/14/2019	Proposed work includes installing a new water main pressure regulating valve from the 18-inch water main along Chiles Ave and connecting it to the 8-inch line south of the building.
2020-047 Install Six Water Bottle Fill Stations and Two A/C Receptacles, Bldg. 1210	TEN19-026	Main Post	BE I.A.2	11/18/2019	
2020-049 Replace Main Door, Bldg. 10014	SO1028610	Turkey Creek Complex	BE I.D1f BE I.D1h	11/18/2019	
2020-050 10th SFG(Airborne) Diver Locker Interior Renovations, Bldg. 7440	SFG17-014	Main Post	BE I.A2	11/21/2019	2020-050 is the review of the Environmental Protection Plan.  Undertaking has been previously reviewed under NEPA Project No. 2017-379, 2018-190, & 2018-351.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-051 & 2020-305 Repair Playground and Install Sidewalk, Child Youth Services (CYS), Bldg. 6204	MWR20-002	Main Post	BE I.A1 BE I.A2 BE I.B1 BE I.B2 BE I.B3	11/25/2019 9/15/2020	Proposed work includes treating the area for invasive plant species and removing the contaminated soil; correcting the drainage and ponding water; replacing the composite structures; replacing the fall zone matting; installing a sidewalk on the north side of the building adjacent to playground with a concrete pad large enough to accommodate approximately 50 children, and installing a sidewalk through the rock garden in front of the building.  2020-051 is the initial review of the project; 2020-305 is an updated review due to a change in project scope.
2020-052 Repair Playground, CYS, Bldg. 6203	MWR20-003	Main Post	BE I.B1 BE I.B2	11/25/2019	Proposed work includes replacing the fall zone matting and repairing the soil erosion along the sidewalk and concrete edging.
2020-053 Synchronize Traffic System & Install Traffic Signals	DPW17-001	Main Post	BE I.A1 BE I.A2	12/4/2019	2020-053 is an updated review as it has been six months since last reviewed and project has not been initiated.  Undertaking has been previously reviewed under NEPA Project No. 2016-496 & 2019-028.
2020-061 Install Electronic Key Pad Access, Bldg. 9668	BAA19-014	Main Post	BE I.A2	12/6/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-062 Lease Renewal for Abrams School, Bldg. 600	n/a	Main Post	BE I.A1 BE I.A2 BE I.A3 BE I.B1 BE I.B2 BE I.B3	12/9/2019	Renew an existing lease for a period of 25 years to Fountain-Fort Carson School District 8 for use of Bldg. 600 and surrounding 10 acres as Abrams Elementary School. All proposed construction, maintenance, and other associated activities must receive approval from USAG Fort Carson. Should these activities occur, they are considered exempted undertakings under the Fort Carson Built Environment PA. All work orders are reviewed by the CRM.
2020-064 Installation of a Direct Push Injection Well at Sewage Treatment Plant	DPW20-032	Main Post	BE I.A2	12/10/2019	
2020-065 & 2020-157 Auditorium Stage Renovation, Bldg. 1129 & 1517	DPT18-016	Main Post	BE I.A2	12/11/2019 3/11/2020	Proposed work at Bldg. 1129 includes replacing the performing arts stage. Proposed work at Bldg. 1517 includes repairing and/or replacing damaged areas of the stage (scratches, gouges, holes, worn areas, etc.) and installing a limited access device on the ladder leading to the catwalk.  2020-065 is the initial review for the project; 2020-157 is a change in project scope.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-066, 2020-254, & 2020-308 Quarterly Record of Environmental Consideration (REC) for Training	DPT20QTR2 DPT20QTR4 DPT21QTR1	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/12/2019 7/9/2020 9/24/2020	Per Fort Carson Regulation 200-1, each quarter the 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 aviation); excavation training, etc. It does not cover brigade training exercises, which are reviewed separately. In addition, excavation training is reviewed by the CRM on a case-by-case basis. Updated GIS layers of protected resource restrictions, as well as Standard Operating Procedures (SOPs) and cultural resources awareness training briefs for Fort Carson and PCMS are provided to the Directorate of Plans, Training, Mobilization, and Security (DPTMS) for planning purposes.
2020-067 Remove Chain Link Gate, Bldg. 1454	4ID20-006	Main Post	BE I.A3	12/12/2019	
2020-069 Prairie Dog Control at Fort Carson and PCMS	DWP20-037	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	BE I.B3 FC D2b PC A3b PC B4b2	12/16/2019	Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; Ranges 11, 24, 29, 45, 104, 105, 109, 111, 115A, 115B, 117, 119, 139, 151, & 153 on Fort Carson; MOUT Site 11A at PCMS; and PCMS Airfield.
2020-070 Construct Asphalt Hardstand, Bldg. 324	CIV20-003	Main Post	BE I.A1	12/17/2019	
2020-071 Install ACFT Storage Container, Bldg. 6190	MED20-002	Main Post	BE I.A1	12/17/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-054, 2020-073, & 2020-309 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	1BD20-001	Main Post	BE I.A1	12/30/2019	
2020-078 Relocate Signs, Bldg. 7500	MED20-003	Main Post	BE I.A2	12/30/2019	
2020-079 Install ACFT Storage Container, Bldg. B7508	MED20-004	Main Post	BE I.A1	1/6/2020	
2020-080 Install Parking Signs on West Side of Parking Lot, Bldg. 1042	GAR20-002	Main Post	BE I.A1	1/6/2020	
2020-082 Clean Ditch and Culverts at Crowsfoot	SO1047249	Main Post	BE I.B2	1/8/2020	Proposed work includes removing sediment from the ditch to restore proper flow from the culverts into the creek and adding riprap and straw waddles, as needed, to stabilize the ditch.
2020-083 Create Temporary Staging Area for Military Tactical Vehicles and Associated Equipment Adjacent to 4th Combat Aviation Brigade Barracks	2BD20-001	Main Post	BE I.A1	1/9/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-084 Interior Renovations, Bldg. 1201	MWR20-012	Main Post	BE I.A2	1/9/2020	Proposed work includes: 1) remove several existing cubicles in Room 102 to create storage space; 2) modify other existing cubicles to accommodate tenant's needs; 3) install a partition with a door to separate women's restroom from main corridor; 4) remove mailboxes from wall by entry and add counter for information desk; 5) remove platform floor in projector's room and add standard finishes to convert to office space; 6) move reception desk and used desks from tenant's current location to Bldg. 1201; and 7) install push button openers for accessibility to two sets of double doors at main entry.
2020-085 Replace Playground Equipment, Bldg. 6205	CIV20-016	Main Post	BE I.A2 BE I.B1	1/9/2020	Proposed work includes removing existing playground equipment and installing new playground equipment, footings, and playground surface.
2020-086 Construct Warrior Recovery Center (WRC) Troop Medical Facility	MCA19-002 PN80411	Main Post	BE I.A1	1/13/2020	2020-086 is the site location approval. Undertaking has been previously reviewed under NEPA Project No. 2019-067
2020-087 Install Culvert and Fill between Tank Trails near Nelson Blvd and Minick Ave	DPW19-068	Main Post	BE I.A1	1/14/2020	
2020-091 52nd BEB Excavation Training Request, Range 62, Fort Carson	n/a	Main Post	BE I.C3	1/16/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-094 Interior Renovations, Bldg. 7473	SFG20-001	Main Post	BE I.A2	1/21/2020	Proposed work includes constructing two office spaces in the south mezzanine of the building comprised of 8-foot, 0.5-inch drywall with metal studs, hanging five doors, and installing six duplex receptacles. In addition, three duplex receptacles will be installed in Room 113.
2020-095 Install Three Park Barbecue Grills near Gazebo, Bldg. 756	TEN20-002	Main Post	BE I.A1 BE I.B1	1/21/2020	
2020-096 Road and Parking Lot Repair, Post-wide	DPW19-101	Main Post Wildlife Demonstration Area	BE I.A2	1/22/2020	Portions of the undertaking within the Main Post APE are considered exempt under the Fort Carson Built Environment PA.  Section 106 consultation was completed in March 2020 for portions of the undertaking within the Wildlife Demonstration Area. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA Annual Report.
2020-099 Essayons Road Project	DPW20-039	Main Post	BE I.A1 BE I.A2	1/27/2020	Proposed work includes constructing a new section of road, paving a portion of the existing road with asphalt, and constructing concrete curb and gutter islands at Gate 19.
2020-100 Install BH-1 Vault and Conduit from Vault to Communications Manhole, Bldg. 1959	SPC20-003	Main Post	BE I.A1	1/27/2020	Proposed work includes installing a new BH-1 vault and amp pedestal and installing 225 feet of conduit via directional bore between the vault and communications manhole.
2020-101 Repair Intersections on Prussman Blvd	DPW19-099	Main Post	BE I.A2	1/27/2020	



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-102 Construct Concrete Brake Test Area, Bldg. 8009	CIV19-023	Main Post	BE I.A1	1/27/2020	
2020-103 Interior Renovations, Bldg. 1219	DPW20-025 DPW20-043	Main Post	BE I.A2	1/28/2020	Proposed work includes leveling the floor in Room 121, relocating the door for Room 121 to the center of the room, and installing cubicles in Rooms 115 and 121.
2020-105 Install Fiber Optic Line in Bldg. 1513	CIV20-004	Main Post	BE I.A1 BE I.A2	1/30/2020	Proposed work includes installing fiber optic line from the existing manhole on the south corner of the building to the west side of the building, then drilling a hole at the location to pull through the building.
2020-106 Arbor Day Tree Planting, Bldg. 6205	DPW20-044	Main Post	BE I.B3	1/30/2020	
2020-107 Install Electrical Outlets in Bldg. 7402, 7403, 7404, 7440, & 7450	SFG18-022	Main Post	BE I.A2	1/31/2020	
2020-108 Field Connelly Cooking Competition, TA Bravo	4ID20-014	Main Post	BE I.B1	1/30/2020	The event includes setting up a field feeding site with multiple tents and field feeding equipment.
2020-109 & 2020-146 Install ACFT Storage Container, Bldg. 1855	MED20-006	Main Post	BE I.A1	2/4/2020 3/6/2020	
2020-110 Relocate SIPR and Integrated Commercial Intrusion Detection System (ICIDS) into Closet, Bldg. 1445	4ID20-008	Main Post	BE I.A2	2/5/2020	
2020-111 Install Command Signage, Bldg. 7495, <b>(project cancelled)</b>	MED20-005	Main Post	BE I.A1 BE I.A2	2/6/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-114 Replace Fire Alarm Panels, Bldg. 238, 330, 1013, 1042, 1049, 1220, 1552, 1554, 1843, 1853, 2252, 2253, 2452, 2453, 2450, 2451, 2454, 5950, 7402, 7400, 7404, 7450, 7462, 7481, 7506, 8000, 8030, 8100, & 8142	DPW20-042	Main Post	BE I.A2	2/10/2020	
2020-115 Install Six 12-inch Diameter OPW Cast Iron Manhole Covers, Three 4-inch Diameter OPW Fill Port Caps, and Three 3-inch Diameter OPW Vapor Port Caps, Gate 3 Shoppette, Bldg. 510	CIV20-020	Main Post	BE I.A2	2/11/2020	
2020-119 Pave Route 5A Tank Trail to Butts Road, Fort Carson	DPW17-007	Main Post	BE I.A2	2/13/2020	
2020-120 Repair Hardstand, Bldg. 3292, Fort Carson	DPW19-005	Main Post	BE I.A2	2/13/2020	2020-120 is an updated NEPA review, as it has been over six months since last reviewed and project has not been initiated.  Undertaking has been previously reviewed under NEPA Project No. 2019-271.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-121 Repair Bridge Safety Features Post-wide, Fort Carson	DPW20-012	Main Post Turkey Creek Complex Downrange Fort Carson	BE I.A2 FC D1b	2/13/2020	Forty bridges and culverts require repairs or upgrades to meet safety requirements. Twenty bridges / culverts are over 45 years old and had not been recorded or evaluated. Therefore, Section 106 consultation was required for these structures. The bridges / culverts were inventoried and evaluated for inclusion in the NRHP. All were determined ineligible for the NRHP. Section 106 consultation was completed in October 2020 for these 20 bridges / culverts. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA Annual Report, and Enclosure 1, Table 2 of the Fort Carson Downrange PA Annual Report.
2020-123 Install New Communication Port, Bldg. 520B	CIV20-022	Main Post	BE I.A2	2/21/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-124 Remove Towers, Fort Carson and PCMS	DPT16-016	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Training Area A	BE I.A3 FC D1d PC B4a4 PC D3a2	2/21/2020	<p>The proposed work includes dismantling six 50-foot and one 100-foot metal communication towers on Fort Carson and PCMS. The location of the towers on Fort Carson are: Bldg. 2135 (50-foot tower), Agony Hill (50-foot tower), and Range 155 (50-foot tower). The location of the towers on PCMS are: Dillingham (50-foot tower), Vouno (50-foot tower), Hogback (50-foot tower), and Cedar Hill (100-foot tower).</p> <p>2020-124 is an updated NEPA review, as it has been six months since previously reviewed and the project has not been initiated. In addition, there has been a change to the original project scope.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2016-290.</p>
2020-127 Mount Tire Machine to Floor, Bldg. 8152	TEN20-007	Main Post	BE I.A2	2/24/2020	
2020-131 Replace Concrete for Gate Post, Bldg. 2038	DPT17-010	Main Post	BE I.A2	2/26/2020	
2020-132 Removal of Cage Lockers, Bldg. 2630	3BD20-004	Main Post	BE I.A2	2/27/2020	
2020-133 Removal of Cage Lockers, Bldg. 2650	3BD20-005	Main Post	BE I.A2	2/27/2020	
2020-134 Install Grounding Rods Bldg. 1959	SPC20-004	Main Post	BE I.A1	2/27/2020	
2020-135 Install Electrical Outlets in Break Room, Bldg. 1219	DPW20-052	Main Post	BE I.A2	2/28/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-137 Install ICIDS and Lenel Security System, Bldg. 9097	TEN20-004	Main Post	BE I.A2	2/19/2020	
2020-138 Add Six Communication Ports, Bldg. 9097	TEN20-008	Main Post	BE I.A2	3/3/2020	
2020-139 Iron Horse Park Renovation, Fort Carson	MWR16-031	Main Post	BE I.A1 BE I.A2	3/4/2020	The proposed work includes the installation of power boxes in six locations of the park.
2020-140 Construction of Barracks for the 2nd Brigade Combat Team	n/a	Main Post	BE I.A1	3/5/2020	This is a review of various proposed locations for site approval.
2020-144 FY2020 Invasive Species Control, Fort Carson and PCMS	DPW20-051	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	3/5/2020	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 has been provided to the proponent for avoidance of protected cultural resources.
2020-147 Upgrade Electrical Outlets in Break Rooms, Bldg. 1219	DPW20-038	Main Post	BE I.A2	3/9/2020	
2020-148 Install Synthetic Turf Athletic Field, Bldg. 9121	TEN20-010	Main Post	BE I.B1	3/9/2020	
2020-149 Install 220-volt Electrical Power to Petroleum, Oil, and Lubricants (POL) Portable Container, Bldg. 9633	4ID20-015	Main Post	BE I.A2	3/10/2020	
2020-150 Install Heritage Sign on Outer Building Wall, Bldg. 9093	TEN20-009	Main Post	BE I.A2	3/10/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-151 Install Temporary Security Fence, Bldg. 9126	GAR20-002	Main Post	BE I.A1 BE I.A3	3/11/2020	Install 1,200 linear feet of temporary 4-foot high orange construction fencing with T-posts every 10 feet.
2020-152 Upgrades on Security Doors, Bldg. 2132	3BD19-003	Main Post	BE I.A2	3/11/2020	Proposed work includes: 1) drilling and pinning of third floor open storage primary entry door hinges and command suite entry door hinges; and 2) installing an additional numerical key pad interface on the current Lenel badge reader for primary entry door and command suite entry door panels.
2020-153 Remove Automated Shelving Units, Bldg. 8030	1BD20-005	Main Post	BE I.A2	3/11/2020	
2020-154 Install Exit Alarm Systems, Bldg. 756, 1005, 1552, 1554, 2144, 2146, 2340, 2344, 2346, 7480, 7482, 7493, 9449, 9459, & 9469	4ID20-018	Main Post	BE I.A2	3/11/2020	
2020-155 Interior Renovation, Rooms 103, 104, 105, 106, & 107, Bldg. 2421	4ID20-004	Main Post	BE I.A2	3/11/2020	Proposed work includes: 1) removing the accordion style room divider in Room 106; 2) painting the hallway, entryway, and Rooms 104, 105, 106, & 107; and 3) replacing the broken internet portal floor cover.
2020-156 Install Communication Line, Bldg. 842	4SB20-001	Main Post	BE I.A2	3/11/2020	Proposed work includes drilling a 2-inch diameter hole and installing a utility box on the exterior of the west site of the building for satellite cable lines to Room 102. Hole will be above the ceiling tiles to allow the cable to run from the building's exterior to Room 102 where the equipment will be located.
2020-159 Install Gutters, Bldg. 2038	DPT20-002	Main Post	BE I.A2	3/16/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-160 Install 220-volt Electrical Outlet, Bldg. 9649	4ID19-021	Main Post	BE I.A2	3/16/2020	
2020-162 Pave Gravel Lot West of Bldg. 324	CIV20-028	Main Post	BE I.A2	3/18/2020	
2020-163 Pave Gravel Lot North of Bldg. 324	CIV20-029	Main Post	BE I.A2	3/18/2020	
2020-164 Install Two Electrical Outlets, Bldg. 9062	1BD18-014	Main Post	BE I.A2	3/17/2020	
2020-165 Demolish Stage Wall, Bldg. 2352	1BD20-009	Main Post	BE I.A2	3/17/2020	
2020-166 Construct Gravel Area for Halftrack, Bldg. 9427	2BD19-005	Main Post	BE I.A1	3/18/2020	
2020-167 Repair Pavement at Gate 20	DPW19-100	Main Post	BE I.A2	3/18/2020	
2020-168 Replace Carpet in Battalion Command Suite, Bldg. 2160	1BD20-008	Main Post	BE I.A2	3/18/2020	
2020-169 Construct Third Classroom, Bldg. 2422	4ID19-016	Main Post	BE I.A2	3/19/2020	
2020-170 & 2020-262 Repair Sidewalk, Bldg. 5506	CIV20-027	Main Post	BE I.A2	3/20/2020 7/7/2020	
2020-171 Expand Intercom System, Bldg. 9093	TEN20-011	Main Post	BE I.A2	3/23/2020	
2020-172 Install 200-volt Electrical Outlet with 20-amp Service for Air Compression in Warehouse Bldg. R057K	DPT19-011	Main Post	BE I.A2	3/23/2020	



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-173 Demolition/Renovation Project, Bldg. 2070 Quad	DPW19-082	Main Post	BE I.A1 BE I.A2 BE I.A3 BE I.B1 BE I.B2 BE I.B3	3/23/2020	Proposed work includes 1) demolishing Bldg. 2076; 2) re-routing hubbed communication lines that support surrounding barracks; 3) renovating Bldg. 2075 for Laundry and CQ desk, and adding patio to east side; 4) repairing the basketball court; 5) adding landscaping rock and trees to repair grounds and erosion; 6) removing outdated site features and physical training equipment; 7) placing bollards and/or boulders for perimeter access control; 8) repairing and/or replacing the damaged sidewalks; and 9) installing a rubberized physical training pit and perimeter fence.
2020-174 & 2020-192 Replace Carpet, Bldg. 2160 & 7438	4ID17-011	Main Post	BE I.A2	3/24/2020 4/16/2020	2020-174 is the initial NEPA review; 2020-192 is an update to the project scope.
2020-175 Reconfigure Sump Pump in Communications Vault, Bldg. 1959	SPC20-005	Main Post	BE I.A2	3/25/2020	Proposed work includes installing an additional pump below ground level and a water-activated audible alarm below the conduit.
2020-176 Install Window Shutter, Bldg. 9686	4ID20-007	Main Post	BE I.A2	3/25/2020	
2020-177 Paint Exterior and Interior of Latrine, Abate Lead-Based Paint, and Repair Ceiling, Range 69A	DPT15-034	Main Post	BE I.A2 BE I.C2	3/25/2020	
2020-178 Replace and/or Modify Maintenance Pit Covers, Bldg. 1982, 2082, 7426, 8142, & 8152	DPW20-041	Main Post	BE I.A2	3/25/2020	
2020-179 & 2020-230 Construct Ivy Mile Obstacle Course	4ID20-016	Main Post	BE I.A1	3/31/2020 5/28/2020	2020-179 is the initial NEPA review; 2020-230 is a change in site location.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-180 Install Sidewalks, Bldg. 6204	CIV20-025	Main Post	BE I.A1	3/31/2020	
2020-181 & 2020-228 Install 110-volt Electrical Outlet, Bldg. 2330	1BD20-006	Main Post	BE I.A2	4/1/2020 5/27/2020	
2020-182 Install Emergency Lighting and Exit Sign, Bldg. 1130	TEN19-002	Main Post	BE I.A2	4/1/2020	
2020-183 Repair Broken Cable, Bldg. 2152	TEN20-012	Main Post	BE I.A2	4/2/2020	
2020-185 Modify Chute Rigging Facility, Bldg. 7438	SFG20-006	Main Post	BE I.A2	4/13/2020	Proposed work includes shortening chute shakeout beams; installing a guide rail to prevent shakeout beam from catching on any foreign objects; constructing a roll cage and installing it around the garage door motor; modifying the access ladder in the tower; and constructing a safety rig and installing it in the shakeout tower.
2020-186 Convert Locker Room to a Non-Secure Internet Protocol Router (NIPR) Telecommunications Room, Room 112, Bldg. 7404	SFG20-007	Main Post	BE I.A2	4/14/2020	Proposed work includes installing fire-retardant 3/4-inch plywood, replacing two windowed doors with solid wooden doors, and installing a split-unit HVAC system.
2020-187 Bolt Sheet Metal Shear and Break to Floor, Bldg. 9680	4ID20-013	Main Post	BE I.A2	4/14/2020	
2020-188 Widen Current Gates on Fenced Enclosure, Bldg. 9680	4ID19-018	Main Post	BE I.A2	4/15/2020	
2020-190 Construct Storage Building with Crane, Bldg. 8000	CIV19-018	Main Post	BE I.A1	4/15/2020	
2020-191 Install Cable and Radio for Wi-Fi Connectivity, Bldg. 1435	4ID20-019	Main Post	BE I.A2	4/14/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-193 Install Bottle Fill Stations, Bldg. 2160 & 2260	3BD20-006	Main Post	BE I.A2	4/15/2020	
2020-195 Repair Waterline, Turkey Creek Ranch Historic District	SO	Turkey Creek Complex	BE I.D1b	4/23/2020	Proposed work includes repairing a water leak between Bldg. 10014 & 10015.
2020-196 Security Upgrades for National Crime Information Center (NCIC), Bldg. 6012	DIR19-017	Main Post	BE I.A2	4/23/2020	<p>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; and 3) replacing existing half-doors with standard 36-inch doors and framework that secures with cypher lock-sets.</p> <p>2020-196 is an updated NEPA review, as it has been over six months since last reviewed and the project has not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2019-334.</p>
2020-197 Repair Leaking Transformer, Bldg. 600	CIV20-032	Main Post	BE I.A2	4/23/2020	
2020-198 Upgrade Lighting, Bldg. 7431	SFG19-013	Main Post	BE I.A2	4/23/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-199 Improvements to Bldg. 7431 (Indoor Baffle Range)	SFG18-008	Main Post	BE I.A2	4/27/2020	<p>Proposed work includes installing 14 structural support bridges (TCT 4 Retrofit Bridge Package with Boom Kits) over the bullet trap frame to ensure the mouth of the trap retains the 1/2-inch opening required for proper usage.</p> <p>2020-199 is an updated NEPA review, as it has been over six months since last review and the project has not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2018-069.</p>
2020-201 Paint Room Doors and Common Areas, Bldg. 1364, 1365, 1663, 1664, 1665, 1666, & 1667	2BD20-006	Main Post	BE I.A2	4/28/2020	
2020-202 Repair Communications Line to Post Office, Bldg. 1519	MWR20-021	Main Post	BE I.A2	4/30/2020	<p>Proposed work includes replacing 164-foot span of communication line from the existing pedestal at the northeast corner of Wetzel Ave and Prussman Blvd to an existing tap north-northwest along Wetzel Ave towards McDonald St.</p>
2020-203 Install Additional Fiber Optic Cable from Existing Node "FC001" on Chiles Avenue to New Node West of Bldg. 4427	MWR20-022	Main Post	BE I.A1 BE I.A2	4/30/2020	
2020-204 Repair Communications Lines at Bldg. 1361 and Install New Communications Lines between Bldg. 1361 and Bldg. 2135	MWR20-023	Main Post	BE I.A1 BE I.A2	4/30/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-205 Furniture Moving Blanket Purchase Agreement	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs	BE I.A2 BE I.D2h BE I.D4 FC D1b PC A2b PC B4a2 PC C3a	5/4/2020	Proposed work includes moving furniture within or between buildings at Fort Carson and PCMS.
2020-206 Disconnect Potable Water Line and Connect Non-Potable Water Line for Irrigation System, Bldg. 7306	CIV20-026	Main Post	BE I.A2 BE I.B3	5/4/2020	
2020-207 Construction, Maintenance, and Operation of a Medical Simulation Training Center	PN90634	Main Post	BE I.A1	5/6/2020	2020-207 is a review of proposed site locations for approval.
2020-208 Replace Roof, Bldg. 1515	DPW19-046 DPW20-005	Main Post	BE I.A2	5/11/2020	<p>Proposed work includes removing the existing spray foam roofing and underlying built-up roofing system and replacing it with a new modified bitumen roofing system. Steel decking will be replaced as needed.</p> <p>2020-208 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. DPW19-046 include several buildings under one project; now the different roof replacement projects have each been assigned a separate project number.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2019-218.</p>

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2020-209 Replace Roof, Bldg. 980	DPW19-046 DPW20-006	Main Post	BE I.A2	5/11/2020	<p>Proposed work includes removing the existing spray foam roofing and underlying built-up roofing system and replacing it with a new modified bitumen roofing system. Steel decking will be replaced as needed.</p> <p>2020-209 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. DPW19-046 include several buildings under one project; now the different roof replacement projects have each been assigned a separate project number.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2019-218.</p>
2020-210 Replace Roof, Bldg. 3492	DPW19-046 DPW20-007	Main Post	BE I.A2	5/11/2020	<p>Proposed work includes removing the existing spray foam roofing and underlying built-up roofing system and replacing it with a new modified bitumen roofing system. Steel decking will be replaced as needed.</p> <p>2020-210 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. DPW19-046 include several buildings under one project; now the different roof replacement projects have each been assigned a separate project number.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2019-218.</p>
2020-215 Demolish Bldg. 302	DPW19-095	Main Post	BE I.A3	5/14/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-216 Demolish Bldg. 305	DPW19-096	Main Post	BE I.A3	5/14/2020	
2020-217 Demolish Bldg. 2354	DPW19-097	Main Post	BE I.A3	5/14/2020	
2020-218 Interior Renovations, Bldg. 5939	MWR20-008	Main Post	BE I.A2	5/15/2020	Proposed work includes converting the ballet room and small gym on the west side of the building to nine office spaces with office cubicles, phone lines, and data drops; changing the children's bathrooms to adult bathrooms; removing mirrors and padding from ballet room and small gym; and adding carpet to those two rooms.
2020-219 Repair Solar Panel Systems, Post-wide	DPW19-050	Main Post	BE I.A1 BE I.A2	5/18/2020	2020-219 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 No. 2019-108.
2020-220 Construct Range Operations Warehouse behind Bldg. 9550	DPT19-030	Main Post	BE I.A1	5/19/2020	
2020-222 Iron Horse Park Improvements	DPW20-003	Main Post	BE I.A1 BE I.A2 BE I.B1 BE I.B2	5/20/2020	Proposed work includes constructing concrete stairs and/or a ramp from the east side of the berm to the west side of the berm located on the east end of the park and providing a continuous paved path to the box culvert. This would include concrete paving over existing breeze/aggregate trail and replacing the deteriorated asphalt. Drainage will be corrected as needed.



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-223 Bldg. 1218 Renovation	DPW15-123	Main Post	BE I.A2	5/21/2020	<p>Proposed work includes: 1) remove the existing hydronic heating system and replace with a new gas-fired HVAC forced-air system; 2) remove the existing plumbing fixtures and toilet partitions throughout the building and replace with new plumbing fixtures and toilet partitions; 3) remove the existing suspended ceiling and replace with suspended ceilings with new LED lighting; 4) install a new fire detection and fire suppression system; 5) abate asbestos-containing materials; 6) remove existing carpet and replace with new carpet tiles; 7) paint all interior walls; 8) improve the existing perimeter walls with new 6-inch metal studs and 1/2-inch drywall with new R-19 insulation between the studs; and 9) install additional electrical duplex outlets and voice/data drops throughout the building.</p> <p>2020-223 is an updated NEPA review, as it has been over six months since last review and the project has not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2016-221 &amp; 2016-333.</p>
2020-226 Construct Concrete Pad, Bldg. 249	CIV20-033	Main Post	BE I.A1	5/27/2020	
2020-227 Replace and Dispose of Bullet Trap and Bridges, Bldg. 7431	SFG20-010	Main Post	BE I.A2	5/27/2020	
2020-229 Install Fire Exit Signs and Light Sensors, Bldg. 2073	1BD20-010	Main Post	BE I.A2	5/28/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-231 Replace Damaged Cable Span Servicing Bldg. 2135	MWR20-026 MWR20-027	Main Post	BE I.A2	5/28/2020	
2020-232 Bolt Weapons Racks to Walls and Floors in Arms Room, Bldg. 9447	2BD20-004	Main Post	BE I.A2	5/28/2020	
2020-233 Replace Roof, Bldg. 3900	DPW19-046 DPW20-008	Main Post	BE I.A2	5/29/2020	<p>Proposed work includes removing the existing spray foam roofing and underlying built-up roofing system and replacing it with a new modified bitumen roofing system. Steel decking will be replaced as needed.</p> <p>2020-233 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. DPW19-046 include several buildings under one project; now the different roof replacement projects have each been assigned a separate project number.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2019-218.</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
2020-234 Replace Roof, Bldg. 3851	DPW19-046 DPW20-009	Main Post	BE I.D1j	5/29/2020	<p>Proposed work includes removing the existing slate roofing down to wood decking, replacing/repairing the wood decking as needed, and replacing with new slate roofing to match the existing roof material in style, size, and color. All work will be done in-kind, and in coordination with the Fort Carson Cultural Resources Manager.</p> <p>2020-234 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. DPW19-046 include several buildings under one project; now the different roof replacement projects have each been assigned a separate project number.</p>
2020-235 Replace Roof, Bldg. 3852	DPW19-046 DPW20-010	Main Post	BE I.D1j	6/2/2020	<p>Proposed work includes removing the existing slate roofing down to wood decking, replacing/repairing the wood decking as needed, and replacing with new slate roofing to match the existing roof material in style, size, and color. All work will be done in-kind, and in coordination with the Fort Carson Cultural Resources Manager.</p> <p>2020-235 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. DPW19-046 include several buildings under one project; now the different roof replacement projects have each been assigned a separate project number.</p>
2020-236 Install Two Intersection Warning Signs, Butts Rd	DPW20-067	Main Post	BE I.A1	6/3/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-237 Replace Roof, Bldg. 2428	DPW19-047 DPW20-011	Main Post	BE I.A2	6/3/2020	Proposed work includes removing the existing single-ply roof membrane and all metal flashing and replacing with a new roof cover board, mechanically fastened PVC membrane, factory-coated flashing and edge metal. 2020-237 is an updated NEPA review, as it has been over six months since last review and project has not been initiated. DPW19-047 include several buildings under one project; now the different roof replacement projects have each been assigned a separate project number.  Undertaking has been previously reviewed under NEPA Project No. 2019-219.
2020-238 & 2020-252 Install Power to Four Trailers, Wickersham and Tevis Streets (near Bldg. 300-301)	GAR20-003	Main Post	BE I.A1 BE I.A2	6/3/2020 6/29/2020	
2020-240 Relocate Two Trees, Bldg. 9420	DPW20-059	Main Post	BE I.B3	6/8/2020	
2020-241 Install Two Overhead Projectors, Two Powered Roll Up Screens with a Switch, and Three 120-volt Electrical Outlets, Bldg. 1200	TEN20-017	Main Post	BE I.A2	6/9/2020	
2020-242 4th of July Iron Horse Park	MWR20-028	Main Post	BE I.B1	6/10/2020	Proposed work includes the installation of temporary fencing for safety during the annual 4th of July celebration at Iron Horse Park.
2020-244 Re-establish the Installation Boundary Fence North of Bldg. 8110	DPW20-070	Main Post	BE I.A1	6/11/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-245 Interior Renovations, Bldg. 1230	GAR20-001	Main Post	BE I.A2	6/11/2020	Proposed work will reconfigure walls to create a courtroom and associated adjacent rooms and to accommodate Judge Advocate General staff. It also includes installing a new HVAC system, fire detection and suppression system, and communication lines and ports, and room finishes, as well as painting the interior.
2020-246 Install Entry Step at Ivy Troop Barber Shop, Bldg. 2355	CIV20-031	Main Post	BE I.A2	6/16/2020	
2020-250 Repairs to Dog Kennel, Bldg. 7472	SFG20-011	Main Post	BE I.A2	6/23/2020	Proposed work includes: 1) stripping all wall surfaces of existing coating within the dog house and applying new coating for 12 houses and dog runs; 2) stripping wall surfaces from existing floor coating to 72 inches above the floor and applying new coating to 2 access hallways, 2 external walkways, and the center hallway between the kennels; 3) stripping all wall surfaces from existing floor coating to 72" above the floor within each dog kennel (both external and internal) and apply new coating to include surfaces normally covered by doors and other hardware; 4) stripping flooring of existing coating within 2 of the 12 dog kennels and runs and installing new flooring material; and 5) removing existing floor coating system along gapped seam between concrete floor and the wall, replacing with a new flooring system, and repairing 6 inches on both sides of the gap.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-251 Renovate Bldg. 9093	TEN19-011	Main Post	BE I.A2	6/24/2020	Proposed work includes removing walls and adding another wall with interior window and door for an office to convert existing rooms into a human performance facility in accordance with U.S. Air Force TACP Human Performance Working Group requirements.
2020-253 Install Coaxial Service to USO Office, Bldg. 1524	MWR20-029	Main Post	BE I.A1 BE I.A2	6/30/2020	Proposed work includes extending coaxial service from the northeast corner of Prussman Blvd and Specker Ave to Bldg. 1524 via directional bore.
2020-256 Install Four Bollards for Outdoor Dock Lift in Second Dock Bay, Bldg. 9121	RES20-001	Main Post	BE I.A2	6/30/2020	
2020-257 Special Operations Forces (SOF) Tactical Equipment Maintenance Facility (TEMF)	PN66326	Main Post	BE I.A1 BE I.A3	7/1/2020	2020-057 is the 65% design review. Undertaking has been previously reviewed under NEPA Project No. 2019-263 & 2019-302.
2020-258 Use Existing Parking Lot Adjacent to 4th Combat Aviation Brigade (CAB) Barracks as a Temporary Vehicle Maintenance Yard for 2nd Brigade Combat Team (BCT)	2BD20-010	Main Post	BE I.A1 BE I.A2	7/6/2020	Proposed work includes installing a fence around the existing parking lots and using them for vehicle maintenance until the new TEMF is built.
2020-273 Construction of ACFT Turf Field, Bldg. 7412	SFG20-013	Main Post	BE I.A1	8/5/2020	Proposed work includes the construction of a 15-foot by 105-foot turf field in front of Bldg. 7412. The field will have a 3.5-inch reinforced concrete base with an athletic turf surface. The concrete base will have relief cuts every 20 feet.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-275 Install & Remove Temporary Concertina Wire Fencing	2BD20-012	Main Post	BE I.A1 BE I.A3	8/4/2020	A 100-foot by 100-foot area will be temporarily enclosed by concertina wire fencing in an area west of Magrath Ave north of Bldg. 2558.
2020-276 Abrams School Relocation	n/a	Main Post	BE I.A1	8/10/2020	This is a review of various proposed locations for site approval.
2020-279 Construction and Operation of Defense Logistics Agency (DLA) Facility	PN 98374	Main Post	BE I.A1	8/11/2020	2020-279 is a review of references for the analysis of impacts under NEPA. Undertaking has been previously NEPA Project No. 2017-072, 2017-197, 2017-274, 2018-086, & 2018-213.
2020-280 Paint Exterior Wall Adjacent to Main Entrance on South Side and Interior Hallway on West Side, Bldg. 2352	1BD20-013	Main Post	BE I.A2	8/11/2020	
2020-283 Interior Renovations, Bldg. 1524	n/a	Main Post	BE I.A2	8/13/2020	Proposed work includes: painting, carpet installation, installing additional outlets, and relocating data drop locations as needed to support occupation of building by United Service Organizations (USO).
2020-284 Upgrades to Coin Laundry, Bldg. 1510	CIV20-043	Main Post	BE I.A2	8/18/2020	
2020-285 Convert Bldg. 1851 to Central Kitchen for Mobile Food Trucks	CIV20-044	Main Post	BE I.A2	8/18/2020	
2020-287 Repair Leak along Irrigation Line for Sprinkler System, Bldg. 9121	TEN20-020	Main Post	BE I.A2	8/20/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-288 Install Temporary Storage Fenced Areas, Bldg. 9466/9487 and 9486/9487	2BD20-013	Main Post	BE I.A1 BE I.A2	8/20/2020	Proposed work will include installing fencing of proposed hardstand expansion lots behind Bldg. 9486/9487 and Bldg. 9466/9467 and creating a gravel lot to create temporary storage until the proposed hardstand expansion is completed.
2020-289 Install Outlets for Ultrasonic Cleaner, Bldg. 9690	CIV20-045	Main Post	BE I.A2	8/24/2020	
2020-291 Bolt Field Safe to Floor in Room 115, Bldg. 9368	CIV20-046	Main Post	BE I.A2	8/25/2020	
2020-292 Install Unit Crest Signage in Rocks in Front of South Side of Bldg. 2460	2BD20-014	Main Post	BE I.A1 BE I.A2	8/26/2020	
2020-296 & 2020-304 Construction of Three Company Operations Facilities (COFs) near Butts Army Airfield (BAAF)	PN77303	Main Post	BE I.A1 BE I.A2	8/31/2020 9/14/2020	2020-296 & 2020-304 is the review of the Environmental Protection Plan.  Section 106 consultation was completed on 10/21/2011 prior to the execution of the Fort Carson Built Environment Plan.  Undertaking has been reviewed under NEPA Project No. CF2011-011, 2018-229, 2019-178, & 2019-374.
2020-297 Replace Failing Cable for Capacity Upgrade	MWR20-032	Main Post	BE I.A2	9/1/2020	The project will replace two spans of failing cable totaling 1,224 feet between Titus Blvd., Light Fighter Dr., and Just Cause Dr.
2020-298 Repair Shower, Bldg. 10002	SO1079460	Turkey Creek Complex	BE I.D2b BE I.D3a	9/2/2020	Proposed work replacing the mixing valve within the wall. A two-foot by two-foot section of the wall by the shower will need to be removed to access and replace the valve. The wall will be patched using in-kind replacement.



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-300 Construct a Concrete Patio with Awning on the North Side of Bldg. 1039	GAR20-007	Main Post	BE I.A2 BE I.A3	9/10/2020	Proposed work includes constructing a 12-foot by 50-foot concrete patio with an overhead covering on the north side of the building. The adjacent playground equipment will be removed.
2020-302 Install Electrical Outlets at the Following Locations: Room 187, Bldg. 9630; Room 129, Bldg. 9633; Room 102, Bldg. 9668; & Room 142, Bldg. 9680	4ID20-026	Main Post	BE I.A2	9/14/2020	
2020-303 Install Pickets to Mark Off Parking Area for Expert Soldier Badge Qualifications Event North of Bldg. 9426	2BD20-015	Main Post	BE I.B1	9/14/2020	The proposed work will include hammering wooden picket stakes into the ground and using cloth engineer tape establish a temporary parking area for the event.
2020-306 SkyCool Systems Department of Energy (DOE) Funded Pilot Project, Bldg. 350	DPW20-071	Main Post	BE I.A2	9/21/2020	This pilot project will install a cooling panel on the roof of Bldg. 350. This panel rejects heat passively to the sky. The panels reject heat 24/7 with no electricity input for cooling and zero evaporative water losses. Bldg. 350 was selected for the pilot project, since it is a cold storage building containing condensers that run year-round and will yield the most savings.
2020-310 Repair Damaged Underground Cable between Willet Cr and Grant Ct	MWR20-031	Main Post	BE I.A2	9/28/2020	
2020-311 Construct Ammunition Breakdown Building, Range 63	DPT20-030	Main Post	BE I.A1	9/28/2020	The proposed work will include constructing a metal building with a concrete slab foundation in the parking lot of Range 63.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-312 Transplant Two Maple Trees from West Side of Bldg. 9420 30 Yards to the East	DPW20-059	Main Post	BE I.B3	9/29/2020	
2020-313 Create Office Space, Bldg. 7404	SFG20-016	Main Post	BE I.A2	9/30/2020	Proposed work includes adding a wall with a door on the west side of Room 126 and west side of Room 117.

**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
2020-010 Repair Leak in Basin of Spring Branch Reservoir ( <b>project pushed to 2025</b> )	DPW19-093	Townsend Reservoir Downrange Fort Carson	10/4/2019	n/a	Section 106 consultation has not been initiated. An inventory and evaluation of Spring Branch Reservoir and Ditch has been completed as part of a larger irrigation network historic context study, and the CRM is reviewing the site documentation and associated technical report.
2020-048 4th Engineer Battalion Permanent Earthmoving Training Site, Training Area Bravo	TEN20-001	Main Post	11/18/2019	HC #77228 2/10/2020	No historic properties affected Responses were also received from the City of Colorado Springs and the Pawnee Nation; both agreed with the finding of effects.
2020-054, 2020-073, & 2020-309 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 PCMS Lettered TAs	12/4/2019 12/20/2019	HC #75648 7/27/2020	No adverse effects to historic properties The SHPO concurred with finding of effects for the Turkey Creek Complex. Section 106 consultation is ongoing for the portions within Bird Farm Recreation Area, Turkey Creek Complex, and Wildlife Demonstration Area. 2020-054, 2020-073, 2020-309 are updated NEPA reviews. Several of the proposed locations were also reviewed as part of the FY18 & FY19 Prescribed Fire and Wildland Fuels Reduction Plan (NEPA Project No. 2018-001, 2018-004, 2018-119, 2018-205, 2018-333, & 2019-259).

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
2020-096 Road and Parking Lot Repair, Post-wide	DPW19-101	Main Post Wildlife Demonstration Area	1/22/2020	HC #77620 3/27/2020	No historic properties affected Responses were also received from the City of Colorado Springs, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma. All parties agreed with the finding of effect.
2020-104 Construction, Operation, and Maintenance of a Recreational Vehicle Park, Camp Falcon	PN82101	Camp Falcon	1/30/2020	HC #76220 8/2/2019	No adverse effects to historic properties. Section 106 consultation was completed in November 2019. 2020-104 is a review of the Request for Proposal. Undertaking has been previously reviewed under NEPA Project No. 2019-243.
2020-121 Repair Bridge Safety Features Post-wide, Fort Carson	DPW20-012	Main Post Turkey Creek Complex Downrange Fort Carson	2/13/2020	HC #78612 10/19/2020	Twenty bridges / culverts are over 45 years old and had not been recorded or evaluated. Therefore, Section 106 consultation was required for these structures. The bridges / culverts were inventoried and evaluated for inclusion in the NRHP. All were determined ineligible for the NRHP. No historic properties affected. Responses were also received from the City of Colorado Springs, Northern Arapaho Tribe, and Pawnee Nation of Oklahoma; all parties agreed with the finding of effects.

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
2020-143 & 2020-158 Construction and Maintenance of Amphibian Pitfall Traps, Fort Carson	DPW20-053 DPW20-057	Main Post Downrange Fort Carson	3/5/2020 3/16/2020	HC #77985 (6/18/2020)	No historic properties affected.  Responses were also received from the City of Colorado Springs, Northern Arapaho Tribe, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma; all parties agreed to the finding of effects.  2020-143 was cancelled; 2020-158 included updated site locations.
2020-221 Repairs to Strobel Ditch	DPW19-024	Turkey Creek Complex	5/19/2020	n/a	Proposed work will restore the Strobel Ditch infrastructure in order to be capable of meeting the decreed water rights use for irrigation. Proposed repairs are limited to the portion of the ditch from the headgate to the point the ditch crosses the road.  Section 106 consultation is ongoing. A full re-assessment of the irrigation network is being conducted to document the entire system to modern-day standards. Fieldwork was completed in September 2020. Archival research and drafting of site documentation and associated technical report of investigations is ongoing.

**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
2020-045 & 2020-255 Balfour Beatty Environmental Management Plan Review	n/a	Main Post	11/14/2019 6/30/2020	Document review
2020-046 & 2020-213 Balfour Beatty Spill Prevention and Response Plan Review	n/a	Main Post	11/14/2019 5/14/2020	Document review
2020-060 4th Infantry Division (4ID) Helicopter Landing Zone Booklet Review	n/a	n/a	12/4/2019	Document review
2020-089 Joint Tactical Ground Station (JTAGS) Limited User Test (LUT), Bldg. 2757	n/a	Main Post	1/14/2020	This is a test of the modification to the JTAGS software system. No potential to effect historic properties.
2020-093 Water Purification Equipment Training, Haymes Reservoir	n/a	Main Post	1/16/2020	No potential to effect historic properties.
2020-194 Right of Entry, El Paso County at Gate 19	n/a	Main Post	4/16/2020	El Paso County requested access to stage equipment and material outside the Gate 19 Entry Control Point.
2020-267, 2020-268, 2020-269, 2020-270, 2020-271, & 2020-272 Force Structure Realignment	SMB20-061	Main Post	7/27/2020	This is a review of force structure realignments proposed for 2020 to 2028. These realignments affect personnel numbers only, and do not require additional building space.
2020-299 Programmatic Environmental Assessment for the Fielding of Armored Multi-Purpose Vehicle (AMPV)	n/a	n/a	9/8/2020	This is a review of the preliminary draft Programmatic Environmental Assessment to analyze the environmental and socioeconomic impacts with the fielding of the new AMPV. Fort Carson is one of the installations proposed to receive the AMPV, which will replace the older M113 family of vehicles. If Fort Carson is chosen, the required construction and training needs associated with this new vehicle will be further analyzed.

**ENCLOSURE 2:**  
**USAG FORT CARSON'S RESPONSE TO SHPO'S COMMENTS ON FY18 & FY19 ANNUAL**  
**REPORTS**





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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](mailto:lindsay.johansson@state.co.us), Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or [jason.obrien@state.co.us](mailto:jason.obrien@state.co.us), or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto:mark.tobias@state.co.us).

Sincerely,

for 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**

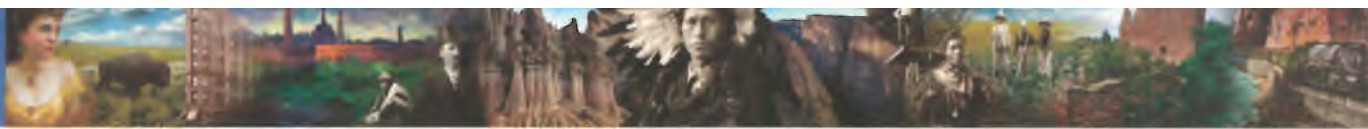
No comments.

**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.





**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.



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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.





**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



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

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").





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

December 30, 2019

Mr. Steve Turner, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Mr. Turner:

Thank you for your correspondence dated November 29, 2018, concerning your review of the fiscal year (FY) 2018 annual reports for the three programmatic agreements. The intention of this letter is to provide you an update on our continuous efforts to train Soldiers and their chain of command on cultural resources and the need to protect them. We also would like to address your comments regarding documentation of cultural resources and mitigation for adverse effects.

With regard to our Cultural Awareness Training program, we sincerely appreciate your observations and understand your questions regarding its overall effectiveness given the statistics you used for your evaluation, however we do not agree with your overall conclusions. In fact, we feel that the training program has been quite effective in raising the awareness level of Fort Carson Soldiers and military leaders, and has contributed greatly to opening communication and establishing cooperative planning lines with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like Directorate of Plans, Training, Mobilization and Security (DPTMS) which are involved with us in planning and executing military training. This cooperative work, which did not exist a few years ago, has in our opinion greatly reduced the potential for and actual impacts to the resources considering the potential for adverse effects associated with military training and heavy use of the land. We also feel an obligation, in light of your comments, to explain the program better for you and your staff, and will try to describe better how the different types of military training, operational tempo, training objectives and scenarios, type of brigade (i.e., Aviation vs Armored vs Stryker etc.), weather, land area used, and other similar factors, can contribute to the number of inadvertent entries outcome. We understand how one could easily come to different conclusions on the overall effectiveness of our training program without having a good understanding of how these military training nuances can affect the effects outcome or the perception of the outcome. In the following paragraphs, we will do our best to explain these contributing factors and hopefully illustrate better the effectiveness of our training program and our vigorous efforts to protect cultural resources.



As an example, you suggest we amend and adjust our cultural awareness training program based on the quantitative data (i.e. the number of inadvertent entries reported for past brigade training exercises) at the Piñon Canyon Maneuver Site (PCMS). What the suggestion does not take into account with regard to our training program is how successful it has been and how few inadvertent entries actually have occurred at Fort Carson, despite the considerably higher operational tempo of maneuver training throughout the year. Further, we feel that focusing on one type of training (i.e., brigade) is not a reliable indicator of overall effectiveness of the cultural awareness training. Each brigade exercise is designed to meet specific training objectives; therefore, no two training scenarios are exactly alike, especially if comparing the Stryker brigade's exercise to the armored brigade's exercise to the infantry brigade's exercise to the combat aviation brigade's exercise. There are significant differences in the type and number of training assets utilized, and the amount of space required as they move across the landscape. For example, the training exercise by the 4<sup>th</sup> Combat Aviation Brigade (4CAB) conducted in 2018 at Fort Carson and PCMS resulted in no inadvertent entries. However, the 4CAB was not better educated in cultural resources awareness than the other brigades. Their training footprint on the ground was much smaller than other brigade exercises, since they are primarily doing air-to-ground force training and not ground-to-ground force training.

Also, as mentioned, other factors like weather play a significant role in the number of entries that could potentially occur during an exercise. For instance, during the 2013 exercise, which had the second lowest number of inadvertent entries reported, training had to be halted due to the adverse weather conditions. For several days, training assets were unable to move across the landscape due to the severe weather conditions.

Similarly, the size and area covered during the training event has a direct effect on the number of protected resources inadvertently entered. For example, after the 3<sup>rd</sup> Armored Brigade Combat Team's (3ABCT) exercise in 2018, a total of 355 protected cultural resources were inspected due to the expansive land area used. Previous exercises required site inspections in the range of 179 to 211. Each training exercise is unique for each unit and unit type, and different training scenarios require different amounts and variety of terrain. So it is difficult to use the number of sites entered as the only criteria for success or failure of the cultural awareness training program.

As pointed out above, what speaks to the success of the cultural resource awareness training in our opinion is how much the unit leaders and exercise planners are involving the Cultural Resources Program staff in preplanning activities in recent years. Our Cultural Resources Program is now involved in all battalion and brigade pre-exercise working group meetings. The Cultural Resources Manager provides, in addition to Environmental Protection Officer training, cultural resources briefs at the



Observer/Controller Team (O/CT) Academy which is held prior to the start of each brigade exercise. Further, the Program, in collaboration with DPTMS, produced a few years ago, a Cultural Awareness video, posted on the Fort Carson web site, which is used regularly to educate Soldiers, unit leaders and Command, in addition to required awareness training prior to major maneuver military training. Cultural Program staff these days are also able to ride-along with Range Inspectors during the exercise, something that did not happen a few years ago. Furthermore, thanks to our efforts, well-trained DPTMS Range Inspectors have been instrumental in moving units away from protected resources and other areas in which the unit is not supposed to be, and letting our Program staff know if protected resources have been entered. It is worth pointing out as well that during execution of past exercises, the Cultural Resources Manager and our PCMS archaeologist have observed units utilizing the resource protection map during pre-movement planning, as well as the O/CTs using the maps to verify that units are not training within restricted areas.

The Cultural Resources Program does regularly review its training materials and methods of dissemination to achieve maximum results. As you may or not be aware, we used community e-newsletters, social media, news print, Maneuver Damage Training, and standard annual training in addition to Environmental Protection Officer Training. We actively seek feedback on the training materials we produce. We would welcome any examples your office may have of other effective cultural resource awareness training used successfully elsewhere. We hope above illustrates our hard work and effectiveness of our awareness training program and the intrinsic difficulties associated with evaluating its success. We can assure you that we will continue our efforts and will do our best to identify additional ways to improve it.

With regard to other comments in your letter, as you know, with limited budgets, our cultural resource projects must be prioritized based on Army mission needs. In collaboration with the Directorate of Plans, Training, Mobilization, and Security, we have developed prioritization criteria for evaluating, mitigating, and marking of resources. Our project focus has been on the assessment of needs data archeological resources and protection of those determined to be historic properties. Additionally, we have been implementing our site monitoring/inspection program to best evaluate the site protection effectiveness. Active projects contracted in support of these priorities are research designs for the evaluation of 21 resources at Fort Carson and 71 resources at PCMS. In addition, 11 isolated finds at Fort Carson and 58 isolated finds at PCMS will be documented and evaluated to modern-day standards.

On another related matter, your letter suggests we have not prioritized mitigation projects associated with the Fort Carson Downrange PA. However, for us, these mitigation projects are one of our program's top priorities. The Mitigation Projects Advisory Committee was developed, and the first meeting was held in June 2015. The



scope of work for the first phase of the Archaeological Context Mitigation Project was drafted in coordination with the advisory committee, and the contract awarded in August 2016. The first phase of the project was completed in August 2018. USAG Fort Carson is coordinating with the Mitigation Projects Advisory Committee to determine other projects to complete for the second phase of the mitigation project. Similarly, USAG Fort Carson has been in consultation with the Tribes on the best use of mitigation funds for the Native American Ethnographic Oral History Project. Originally during the Annual Tribal Consultation meeting in January 2015, it was suggested to use these mitigation funds to develop Tribe-specific education videos. USAG Fort Carson pursued this idea, until it was learned through further discussions at the following annual meeting that it was no longer supported by the Tribes. As a result of ongoing consultation, it was decided to conduct a holistic traditional use study of the Hogback at PCMS. We have worked with the Tribes in the development of the project's scope of work, and the contract was awarded in September 2019.

The Bent's Fort Chapter of the National Santa Fe Trail Association briefed the Mitigation Projects Advisory Committee on an idea for the Santa Fe Trail Community Outreach Project. The committee requested a more formal proposal from the organization to include proposed budget and deliverables. After several attempts to engage the designated representative from the Bent's Fort Chapter, the formal proposal has not been provided.

USAG Fort Carson is consulting with the Tribes on the re-assessment of the Turkey Creek Rock Art Historic District (5PE14). Two site visits have been conducted. Another visit was scheduled for October 2019, but had to be canceled due to lack of Tribal participation. As this district is a property of traditional, religious, and cultural importance, we will continue our collaboration with the Tribes to develop criteria for how the district will be defined and managed in the future.

All signatories associated with the Fort Carson and PCMS training programmatic agreements have acknowledged that training activities across the landscape could have the potential to result in adverse effects to historic properties. You and the Advisory Council on Historic Preservation agreed military training is exempted from further Section 106 consultation with the stipulation that training is not authorized to occur within protected resources. There are also stipulations to conduct inspections of protected resources to determine if these sites are being impacted from training activities. The agreements further stipulate that if adverse effects are noted, then USAG Fort Carson would initiate consultation to resolve for those effects in accordance with 36 CFR 800.6. We have determined sites have been adversely affected due to past military training activities. With the information we have gleaned from our investigations and discussions with the training community, the USAG Fort Carson is working to develop a mitigation strategy. We are currently drafting mitigation plans for

36 sites at PCMS that will help to inform our decision on the best strategy to employ. We plan to initiate discussions with your staff in the near future to develop and execute memorandums of agreement to resolve for some of the acknowledged adverse effects from past training.

To address the comments from your enclosures see the attached enclosures 1, 2, and 3.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,

A handwritten signature in dark ink, appearing to read "Carl R. deAguilar", written over a horizontal line.

Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures



**Enclosure 1:**  
**USAG Fort Carson's Response to 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.*

USAG Fort Carson did not feel a response to the Colorado Council of Professional Archaeologists was required, as they agreed with the finding of effect as long as 1) the color of the silicone sealant used on Building 10015's roof was consistent with the original color of the roof, and 2) the visual impacts from leaving the concrete footing associated with the grain silo would be minimized.

The Section 106 undertaking review documentation provided the product specifications, to include the color to be used, and photographs of the existing roof color and condition. As seen in the photographs provided, the roof is currently painted white; the sealant color is also white.

In reference to the grain silo footings being seen after the silo removal, the Section 106 photographs provided show that the footing are flush with the ground surface. Therefore, there would be no visual impacts from leaving the footings in situ.

**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.*

Thank you for your comment.

H.

*No comments.*



**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2018 Fort Carson  
Downrange 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.*

Thank you for your comment.

**III. Action Updates**

**A. Status of Task 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 (5PE14) 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 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.*

Thank you for your comment. USAG Fort Carson is collaborating with culturally affiliated Native American Tribes in the development of criteria for the definition and management of the Turkey Creek Rock Art Historic District. Once these criteria have been developed, we will continue consultation with your office on the district boundaries and its contributing and non-contributing sites.

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

In correspondence dated February 26, 2018, and March 7, 2018 (HC #63877), you did not concur with the determination of eligibility for sites 5EP6171, Lytle Ditch, and 5EP6641.1, an isolated T-shaped concrete structure thought to be a culvert to channel water from the small channel on the southwest side of the culvert into the main channel of Turkey Creek on the northeast side in southeastern corner of Turkey Creek Complex. We are currently drafting an irrigation network context study that will address many of



your questions. These sites continue to be treated as protected resources until this matter can be resolved.

*III.E: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to 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.*

The stipulation 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..." USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems, but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

#### 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.*

This comment has been addressed in the body of the letter.

#### 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.*

This is not a good example of "the disconnect between individuals at various command levels." The portable latrines were placed there by a private contractor, not the military unit conducting the exercise. The Contracting Officer's Representative contacted the contractor to resolve the issue once noticed by our Conservation Law Enforcement staff. This event provided us an opportunity to place additional safe guards for contractor delivered latrines in the future.

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.*

The After Action Report has been mailed to your office in mid-December 2019.

F. Amendment

*See comment III.A.I.C above.*

We do not understand how your comment on III.A.I.C above relates to proposed amendments to the Fort Carson Downrange PA.

G. Dispute Resolution

*No comments.*



**Enclosure 3:**  
**USAG Fort Carson's Response to 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 resources 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.*

Thank you for your comment. As part of the Section 106 undertaking review process, the Cultural Resources Manager (CRM) does assess the need for surveying the area of potential effects (APEs). Depending on the location and type of the proposed undertaking, the CRM may decide to re-survey an area or have an archaeological monitor on site. The implementing regulations for Section 106 of the National Historic Preservation Act calls for a "reasonable and good faith effort" to identify historic properties (not cultural resources) within an undertaking's APE. The CRM reviewed all available data, and given the project location and the potential for historic properties, determined re-survey of these APEs are not warranted. Based on geoarchaeological investigations, there is low potential for intact cultural materials in arroyo affected by cutting, unless it is a very recent cutting event (less than 500 years ago), then there may be moderate potential for cultural materials (Andresky 1990; Schuldenrein 1985). If a historic property should exist within these areas, it would most likely be buried; as such, traditional survey methods would not identify these properties. Therefore, the PCMS Archaeologist will monitor this project, which is a CRMP best management practice for these types of projects. The USAG Fort Carson also has a standard operating procedure for the inadvertent discovery of cultural materials, which is provided to project proponents for dissemination.



### III. Action Updates

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

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles, on the Hogback, and along or in canyon areas that are designated for dismounted maneuver. We acknowledge that vehicle entries do inadvertently occur to some of these "Need Data" sites, but resources are being directed to place a higher level of protection to known historic properties. In addition, the SHPO concurred with our protection management strategy for needs data sites as listed in Appendix 2 of the PCMS PA when the amendment was signed in April 2018.

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. Physical protection measures will never be foolproof. Even sites that have boulders, in addition to the Seibert markers or fencing, have been entered. These measures are just one of the levels of protection measures in place. The Seibert markers have worked well as a deterrent. We have seen many cases where vehicles have driven up to the site, then turned around when they came upon the markers. And even with some of the reported entries, the vehicle entered and then immediately backed out or turned around and exited the site when the Seibert markers were observed. Although not perfect this is why there is a provision in the 36 Code of Federal Regulations Part 800 to address resolution of adverse effects.

*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.*

The stipulation 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...” USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems (GPS), but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

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.*

This comment has been addressed in the body of the letter.

C. Brigade Training Exercises

*We suggest that all training exercises have the potential to adversely affect historic properties 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.*

This comment has been addressed in the body of the letter.

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.*

Thank you for your comment.

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

"None (Administrative)" is defined as resources requiring administrative protection measures, as defined in the PCMS PA, that do not have any physical markers in place.

"None (Nominal)" is defined as resources requiring nominal protection measures, as defined in the PCMS PA, that do not have any physical markers in place. Due to high potential for looting, these sites are not marked.

"None (Standard)" is defined as resources requiring standard protection measures, as defined in the PCMS PA, that do not have any physical markers in place. None of the protected resources should have been listed as such in Appendix 2, but there were seven sites that were listed as "None (Standard):" 5LA3269, 5LA3300, 5LA3387, 5LA4399, 5LA5698, 5LA6108, and 5LA7443. A review of our Geographic Information Systems (GIS) data and site documentation shows the table was in error. At the time of the drafting of the FY18 Annual Report: sites

- 5LA3269, 5LA3300, and 5LA5698 should have been categorized as Seibert Markers – Corners only (Standard). These have since been fully marked with Seibert markers.
- 5LA3387 should have been categorized as Seibert Markers, Protection Fence, & Terrain (Standard), as it is located within a large area containing several sites that are surrounded by a combination of fencing and Seibert markers.
- 5LA4399 and 5LA7443 should have been categorized as Seibert Markers – Corners only & Terrain (Standard). The Integrated Training Area Management (ITAM) Program has awarded a contract to complete the marking of these sites.

- 5LA6108 seems to be the only site that lacks any physical protection measures. It will be marked as part of the ITAM site marking project this year

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").*

Thank you for your comment.



Wayne



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

JAN 15 2020

Re: Fiscal Year (FY) 2019 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear M. Rivero-deAguilar:

Thank you for your emailed correspondence dated 15 November 2019 and received by our office electronically the same day regarding review of the Fiscal Year 2019 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.

Similar to our comments on the FY2018 annual report, our first 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.

Again, we also 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 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. Training cannot be only from the "bottom up" or "top down," but should incorporate varying pedagogies, methods, and should be targeted at varying groups.

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](mailto:lindsay.johansson@state.co.us), Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or [jason.obrien@state.co.us](mailto:jason.obrien@state.co.us), or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto: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**

**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 PA. We anticipate working closely together during Fiscal Year 2020 on additional portions of the agreement.

**H.**

No comments.



**Attachment 2:**  
**SHPO Comments on FY2019 Down Range Fort Carson PA Annual Report (HC#63877)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

2019-134, 163: Our office looks forward to consultation on these undertakings.

2019-321: We request to be involved in resolution of the concerns expressed by consulting parties.

**III. Action Updates**

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

I.C: As detailed in Enclosure 2, we have not provided concurrence on eligibility for several sites. Additionally, other sites are categorized as needs data. We feel that several issues are contributing to the situation.

One issue is the fact that USAG Fort Carson has not yet documented and reevaluated the Turkey Creek Rock Art District. As discussed during the August 16-18, 2017 Turkey Creek Rock Art District Tribal Consultation Meeting, U.S. Army Garrison (USAG) Fort Carson is working to proactively improve its management of the Turkey Creek Rock Art District (TCRAD). One method is to evaluate the existing district and create an amendment to the district nomination documentation to reflect current surveys and Tribal consultation. Loendorf et al. (2017:9.3) puts forward three of the many options available. Our office views TCRAD Approach 2 as the preferred option. This solution was previously put forward by Zier et al. (1997), and we see this as the option which is the most in keeping with the intentions of the preservationists who originally nominated the "Indian Petroglyphs and Pictographs/Turkey Creek Canyon" district for listing in the National Register in 1976. TCRAD Approach 2 would allow for a geographically unified district that represents not only a landscape feature (the drainage) but would also include all sites associated with prehistoric use of that feature, rather than isolating rock art from other human uses of the landscape with which the rock art may be associated. In order to properly evaluate many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district. We request that renewed effort be placed on this during FY2020.

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, particularly when "administrative protections" are the only methods being used.

VI.B: Please include timetables and anticipated for completion of offsetting mitigation efforts.

**B. Cultural Resource Awareness Training**



We appreciate USAG Fort Carson's willingness to address our 29 November 2018 requests for an assessment of the effectiveness of the training program. We also appreciate USAG Fort Carson's 30 December 2019 letter that provided additional information concerning the current training activities. To reiterate, while we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.

Again, 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 appreciate USAG Fort Carson's efforts to document inadvertent entries, but feel that the continuing incidents further reinforces our position that the current method(s) of education are only minimally effective. Additionally, while each individual entry may not result in an adverse effect, we maintain our position that cumulatively, these incidents are proof that military use of these landscapes are an adverse effect to historic properties.

#### D. Inadvertent Discoveries

No comments.

#### E. Emergency Response

No comments.

#### F. Amendment

No comments.

#### G. Dispute Resolution

No comments.



**Attachment 3:**  
**SHPO Comments on FY2019 PCMS PA Annual Report (HC#65747)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

No comments.

**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 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**

As stated above, 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.

D. Inadvertent Entries and/or Impacts to Historic Properties

See comment C above. We look forward to continued consultation to resolve the effects of previous training exercises.

E. Inadvertent Discoveries

No comments.

F. Emergency Response

No comments.

G. Amendment

No comments.

H. Other

No comments.



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

October 30, 2020

Mr. Steve Turner, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Mr. Turner:

Thank you for your correspondence dated January 15, 2020, concerning your review of the fiscal year (FY) 2019 annual reports for the three programmatic agreements. The intention of this letter is to address your comments on mitigation efforts to resolve for adverse effects related to military use of Fort Carson and Piñon Canyon Maneuver Site (PCMS) and our cultural resources awareness training program.

The Advisory Council on Historic Preservation, Colorado State Historic Preservation Officer, and U.S. Army Garrison (USAG) Fort Carson acknowledged military use of Fort Carson and PCMS does have the potential to result in direct, indirect, and cumulative adverse effects to historic properties. All signatories to the programmatic agreements agreed military training is exempted from further Section 106 consultation with the stipulation that training is not authorized to occur within protected resources at both Fort Carson and PCMS, and is not authorized to occur within unsurveyed areas at PCMS, with the exception of foot traffic. There are also stipulations to conduct inspections of protected resources to determine if these sites are being impacted from training activities at Fort Carson and PCMS, as well as the stipulation to conduct after action inspections of protected resources after all brigade exercises at PCMS. This very robust monitoring provides transparent and real-time feedback to our partners on how effective our protection measures are working. The agreements further stipulate that if adverse effects are noted, then USAG Fort Carson would initiate consultation to resolve for those effects in accordance with 36 CFR 800.6.

*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 Down Range Fort Carson (Fort Carson Downrange PA) does include mitigation measures to resolve for adverse effects at 22 cultural resources and unrecorded historic properties that may exist within areas exempted from cultural resources survey. These mitigations were included in the programmatic agreement because U.S. Army Garrison (USAG) Fort Carson recognized the potential direct, indirect, and cumulative adverse effects to historic properties from military use of downrange Fort Carson. It is also one of the reasons why the Fort Carson Downrange PA includes a stipulation to routinely inspect*



and monitor protected resources and inform your office of any inadvertent entries or other impacts.

Since the implementation of the Fort Carson Downrange PA in 2014, eight sites have been entered as a result of military training: 5EP161, 5EP117, 5EP2524, 5EP5974, 5EP7602, 5EP8157, 5PE793, and 5PE2966. One of these eight (5EP161) was impacted by Contractors who placed portable latrines within the perimeter of the site in support of a military training exercise, and not by Soldiers training. Site 5PE2966 has been entered three times since 2017; as a result, USAG Fort Carson determined cumulative adverse effects due to military training were occurring at this historic property. You concurred with our finding of effects via correspondence dated June 1, 2020 (HC #77880). We also determined cumulative adverse effects due to erosion and military training were occurring at 5PE8157 with which you concurred via correspondence dated September 30, 2020 (HC #63877). The Fort Carson Cultural Resources Manager is working with your office to develop appropriate mitigations to resolve for adverse effects at these two sites.

Based on the few sites that have been entered since 2014 and the amount of military training that occurs downrange on a daily basis, we do not agree with your suggestion to initiate additional consultation to mitigate the direct, indirect, and cumulative adverse effects related to military use of downrange Fort Carson on a broad scale. Instead, USAG Fort Carson will continue to consult on a case-by-case basis when inadvertent entries or other impacts occur, and if we find that adverse effects are occurring or have occurred at the historic property, we will initiate consultation at that time to resolve for those adverse effects.

We do agree an overarching approach to mitigation is the best course of action to resolve for potential direct, indirect, and cumulative adverse effects resulting from military use of the PCMS. This is the approach we are pursuing as we continue consultation to resolve for adverse effects to historic properties from past brigade exercises. USAG Fort Carson has been working on developing mitigation plans for 36 historic properties at PCMS that have been adversely affected or have been entered during multiple exercises, as discussed at the Annual Programmatic Agreement Meeting with your office and consulting and/or interested parties. These mitigation plans will help inform our decision on the best strategy to employ and be ready to discuss various types of mitigation with your office, Native American Tribes, and other consulting and/or interested parties as we continue consultation to resolve for adverse effects.

In our December 30, 2019, letter we discussed at length why one cannot use quantitative data based on the number of inadvertent entries that occurred during brigade exercises to assess the effectiveness of our cultural resources awareness training program. What speaks to the success of the cultural resource awareness training in our opinion is the open communication and the establishment of cooperative planning lines with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like the Directorate of Plans, Training, Mobilization and Security,



that are involved in planning and executing military training. These entities regularly engage Cultural Resources Program staff in preplanning activities, such as battalion and brigade pre-exercise working group meetings. The majority of the individuals involved in these meetings are lieutenants, captains, majors, and lieutenant colonels. This collaboration has in our opinion greatly reduced the potential for and actual impacts to the resources associated with military training and heavy use of the land.

The Cultural Resources Program does regularly review its training materials and methods of dissemination to achieve maximum results. As stated in our December 30, 2019, letter, we would welcome any examples your office may have of other effective cultural resource awareness training used successfully elsewhere. We can assure you that we will continue our efforts and will do our best to identify additional ways to improve it.

The Department of Army has developed an organization (Training and Doctrine Command Culture Center), which is responsible for developing and delivering appropriate cultural resources awareness training to all Army leaders, this includes field grade and general officers. This training is provided at various times in each Soldier's career through formal education and assignment specific training.

To address the comments from your enclosures see the attached enclosures 1, 2, and 3.

Point of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,

RIVERO-  
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Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures

**Enclosure 1:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 Fort Carson Built  
Environment PA Annual Report (HC #58731)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*No comments*

**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 PA. We anticipate working closely together during Fiscal Year 2020 on additional portions of the agreement.*

Thank you for your comment.

H.

*No comments.*

**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 Fort Carson**  
**Downrange PA Annual Report (HC #63877)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*2019-134, 163: Our office looks forward to consultation on these undertakings.*

Section 106 consultation has not been initiated for 2019-134.

Section 106 consultation is ongoing for 2019-163 Installation of Three-Phase Electrical to Range 123. Via correspondence dated July 1, 2020 (HC #75708), your office requested an inventory for historic properties to be completed on the portion of area of potential effects that lies outside of the jurisdictional boundary of Fort Carson. Your office was provided an opportunity to review and comment on the research design for the cultural resources survey. Fieldwork has been completed, and the Fort Carson Cultural Resources Manager is waiting for the draft site documentation and associated technical report of investigations to be submitted by Alpine Archaeology for review and comment.

*2019-321: We request to be involved in resolution of the concerns by consulting parties.*

Your office was involved in the resolution of the concerns by consulting parties. Additional Section 106 consultation was completed for the revised area of potential effects in March of 2020.

**III. Action Updates**

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

*I.C: As detailed in Enclosure 2, we have not provided concurrence on eligibility for several sites. Additionally, other sites are categorized as needs data. We feel that several issues are contributing to the situation.*

*On issue is the fact that USAG Fort Carson has not yet documented and reevaluated the Turkey Creek Rock Art District. As discussed during the August 16-18, 2017 Turkey Creek Rock Art District Tribal Consultation Meeting, U.S. Army Garrison (USAG) Fort Carson is working to proactively improve its management of the Turkey Creek Rock Art District (TCRAD). One method is to evaluate the existing district and create an amendment to the district nomination documentation to reflect current surveys and Tribal consultation. Loendorf et al. (2017:9.3) puts forward three of the many options available. Our office views TCRAD Approach 2 as the preferred option. This solution*

*was previously put forward by Zier et al. (1997), and we see this as the option which is most in keeping with the intentions of the preservationists who originally nominated the "Indian Petroglyphs and Pictographs/Turkey Creek Canyon" district for listing in the National Register in 1976. TCRAD Approach 2 would allow for a geographically unified district that represents not only a landscape feature (the drainage) but would also include all sites associated with prehistoric use of that feature, rather than isolating rock art from other human uses of the landscape with which the rock art may be associated. In order to properly evaluate many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district. We request that renewed effort be placed on this during FY2020.*

Thank you for your comment. USAG Fort Carson is collaborating with culturally affiliated Native American Tribes in the development of criteria for the definition and management of the Turkey Creek Rock Art Historic District. Once these criteria have been developed, we will continue consultation with your office on the district boundaries and its contributing and non-contributing sites. Due to travel restrictions associated with COVID-19, a site visit to view and discuss other portions of the Turkey Creek drainage did not occur this year. USAG Fort Carson believes it would be best to conduct a traditional use study of the Turkey Creek drainage, similar to the study being conducted for the Hogback at Piñon Canyon Maneuver Site, and we will be requesting funds for this project in the future.

*III.E: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to 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, particularly when "administrative protections" are the only methods being used.*

The stipulation 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..." USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems, but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. USAG Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

## **B. Cultural Resource Awareness Training**

*We appreciate USAG Fort Carson's willingness to address our 29 November 2018 request for an assessment of the effectiveness of the training program. We also appreciate USAG Fort Carson's 30 December 2019 letter that provided additional information concerning the current training activities. To reiterate, while we view the*

*current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.*

*Again, 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.*

This comment has been addressed in the body of the letter.

C. Inadvertent Entries and/or Impacts to Historic Properties

*We appreciate USAG Fort Carson's efforts to document inadvertent entries, but feel that the continuing incidents further reinforces our position that the current method(s) of education are only minimally effective. Additionally, while each individual entry may not result in an adverse effect, we maintain our position that cumulatively, these incidents are proof that military use of these landscapes are an adverse effect to historic properties.*

This comment has been addressed in the body of the letter.

D. Inadvertent Discoveries

*No comments.*

E. Emergency Response

*No comments.*

F. Amendment

*No comments.*

G. Dispute Resolution

*No comments.*



**Enclosure 3:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 PCMS PA Annual Report (HC #65747)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*No comments.*

**III. Action Updates**

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

*I.B: We suggest that administrative protections, such as those provided to the 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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles, on the Hogback, and along or in canyon areas that are designated for dismounted maneuver. We acknowledge that vehicle entries do inadvertently occur to some of these "Need Data" sites, but resources are being directed to place a higher level of protection to known historic properties. In addition, the SHPO concurred with our protection management strategy for needs data sites as listed in Appendix 2 of the PCMS PA when the amendment was signed in April 2018.

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. Physical protection measures will never be foolproof. Even sites that have boulders, in addition to the Seibert markers or fencing, have been entered. These measures are just one of the levels of protection measures in place. The Seibert markers have worked well as a deterrent. We have seen many cases where vehicles have driven up to the site, then turned around when they came upon the markers. And even with some of the reported entries, the vehicle entered and then immediately backed out or turned around and

exited the site when the Seibert markers were observed. Although not perfect, this is why there is a provision in the 36 Code of Federal Regulations Part 800 to address resolution of adverse effects.

*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 no 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.*

The stipulation 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...” USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems (GPS), but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. USAG Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

#### B. Cultural Resource Awareness Training

*As stated above, 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 ranking soldiers, these measures may be more effective.*

This comment has been addressed in the body of the letter.

#### C. Brigade Training Exercises

*We suggest that all training exercises have the potential to adversely affect historic properties 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*

This comment has been addressed in the body of the letter.

#### 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 previous training exercises.*

Thank you for your comment.

E. Inadvertent Discoveries

*No comments.*

F. Emergency Response

*No comments.*

G. Amendment

*No comments.*

H. Other

*No comments.*

**FISCAL YEAR (FY) 2020 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, 2020**

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, 2019, through September 30, 2020, 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 Manager (CRM) during the reporting period. Forty-nine 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). Seven undertakings required Section 106 consultation during the reporting year. Section 106 consultation has been completed for four undertakings (2020-058, 2020-059, 2020-121, and 2020-200), is in progress for one undertaking (2020-260), and has not been initiated for one undertaking (2020-088/294 and 2020-249).

The following is an update to the status of Section 106 consultation continuing from the fiscal year 2019 reporting period:

- 2019-134 Remove Diversion Berm above Quarry Pond, Stone City: Section 106 has not been initiated for this proposed undertaking; project is on hold.
- 2019-163 Install Three-Phase Electrical Power to Range 123, Fort Carson: See Table 2 in Enclosure 1, NEPA Project No. 2020-260.
- 2019-204 Black Hills Energy's Southern Colorado Reliability Upgrade Project, Fremont and Pueblo Counties, Colorado: The Section 106 undertaking review



packet was submitted to the SHPO, Native American Tribes, and other consulting and interested parties in October of 2019. USAG Fort Carson determined the undertaking would not have adverse effects to historic properties. The SHPO concurred with our finding of effects via correspondence dated November 12, 2019 (HC #76753). A response was also received from the Pawnee Nation of Oklahoma, agreeing with the finding of effects.

- 2019-321 Operation of the MQ-1C Gray Eagle or Similar Unmanned Aerial System in National Airspace: Due to a change in project scope, another Section 106 undertaking review packet was submitted to the SHPO, Native American Tribes, and other consulting and interested parties in January of 2020. USAG Fort Carson determined the undertaking would not have adverse effects to historic properties. The SHPO concurred with the finding of effects via correspondence dated January 27, 2020 (HC #76656) on the revised undertaking. Responses were also received from the City of Colorado Springs, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effects.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRM. One project is a document review, and one is a review of Programmatic Environmental Assessment.

### **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 September 2020
- 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 January 15, 2020 (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 suggested all “command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis” as that provided to “soldiers at the unit level.” The SHPO emphasized cultural awareness training that targets various audiences would make protection measures more effective.

Enclosure 3 includes the SHPO’s January 15, 2020, letter, and the USAG Fort Carson’s response to the SHPO dated October 30, 2020.

### *C. Inadvertent Entries and/or Impacts to Historic Properties*

During the reporting period, inadvertent entries and/or impacts to historic properties were documented at one site: 5PE8157.

- CF2020-007: During a routine inspection on March 8, 2020, a Fort Carson Conservation Law Enforcement Officer identified a potential vehicle entry into site 5PE8157. The officer informed the Cultural Resources Manager on March 9, 2020. The SHPO was notified via email on March 9, 2020. One set of vehicle tracks belonging to a wide-based, wheeled vehicle, such as a Stryker, entered the site clipping the southern boundary of Feature 1 (artifact concentration/activity area). The vehicle left light impressions (up to 2 cm in depth). The vehicle entry did not have a direct adverse effect on the historic property, but cumulative adverse effects may be occurring due to past military training activities that occurred within the site boundary and the two-track road that bisects the site. Data recovery was recommended. A Memorandum for Record and supporting documentation were submitted to the SHPO, Native American Tribes, and other consulting and interested parties on September 23, 2020. Via correspondence dated September 30, 2020 (HC #63877), the SHPO concurred with the finding of cumulative adverse effects to a historic property. Consultation will continue to discuss the appropriate mitigation to resolve for adverse effects and develop a Memorandum of Agreement implementing the chosen mitigation approach.

### *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.

- Incident No. 2019-3037: The wildland fire started on December 4, 2019, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned within the Large Artillery Impact Area. No historic properties were affected.
- Incident No. 2020-00587: The wildland fire started on February 24, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned on Range 109. No historic properties were affected.
- Incident No. 2020-0596: The wildland fire started on February 25, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned on Range 109. No historic properties were affected.
- Incident No. 2020-00610: The wildland fire started on February 26, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned on Range 115B. No historic properties were affected.
- Incident No. 2020-00690: The wildland fire started on March 5, 2020, with fire suppression activities concluding the same day. Approximately 0.25 acres were burned on Range 115. No historic properties were affected.
- Incident No. 2020-00698: The wildland fire started on March 6, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned on Range 151. No historic properties were affected.
- Incident No. 2020-00720: The wildland fire started on March 7, 2020, with fire suppression activities concluding the same day. Approximately 0.25 acres were burned on Range 155. No historic properties were affected.
- Incident No. 2020-00722: The wildland fire started on March 7, 2020, with fire suppression activities concluding the same day. Approximately 1 acre was burned on Range 155. No historic properties were affected.
- Incident No. 2020-00740: The wildland fire started on March 9, 2020, with fire suppression activities concluding the same day. Approximately 0.25 acres were burned on Range 155. No historic properties were affected.
- Incident No. 2020-00741: The wildland fire started on March 9, 2020, with fire suppression activities concluding the same day. Approximately 1 acre was burned on Range 151. No historic properties were affected.
- Incident No. 2020-00779: The wildland fire started on March 12, 2020, with fire suppression activities concluding the same day. Approximately 10 acres were burned on Range 155. No historic properties were affected.
- Incident No. 2020-00780: The wildland fire started on March 12, 2020, with fire suppression activities concluding the same day. Approximately 0.5 acres were burned on Range 115B. No historic properties were affected.

- Incident No. 2020-00962: The wildland fire started on March 30, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned on Range 141A. No historic properties were affected.
- Incident No. 2020-00964: The wildland fire started on March 30, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned in Training Area (TA) 41. No historic properties were affected.
- Incident No. 2020-01551: The wildland fire started on June 9, 2020, with fire suppression activities concluding the same day. Approximately 0.5 acres were burned along the East Barrier near Range 119 and Hanover. No historic properties were affected.
- Incident No. 2020-01610: The wildland fire started on June 15, 2020, with fire suppression activities concluding the same day. Approximately 0.25 acres were burned on Range 141A. No historic properties were affected.
- Incident No. 2020-01772: The wildland fire started on July 10, 2020, with fire suppression activities concluding the same day. Approximately 1 acre was burned on Range 151. No historic properties were affected.
- Incident No. 2020-02005: The wildland fire started on July 22, 2020, with fire suppression activities concluding the same day. Approximately 14.32 acres were burned in TA 12. No historic properties were affected.
- Incident No. 2020-02140: The wildland fire started on August 4, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned in TA 41. No historic properties were affected.
- Incident No. 2020-02171: The wildland fire started on August 4, 2020, with fire suppression activities concluding the same day. Approximately 0.5 acres were burned in the Large Artillery Impact Area. No historic properties were affected.
- Incident No. 2020-02447: The wildland fire started on September 2, 2020, with fire suppression activities concluding the same day. Approximately 3 acres were burned on Range 127A. No historic properties were affected.
- Incident No. 2020-02457: The wildland fire started on September 3, 2020, with fire suppression activities concluding the same day. Approximately 0.25 acres were burned on Range 111. No historic properties were affected.
- Incident No. 2020-02463: The wildland fire started on September 4, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned on Range 109. No historic properties were affected.



- Incident No. 2020-02469: The wildland fire started on September 5, 2020, with fire suppression activities concluding the same day. Approximately 11 acres were burned on Range 111. No historic properties were affected.
- Incident No. 2020-02507: The wildland fire started on September 7, 2020, with fire suppression activities concluding the same day. Approximately 0.1 acres were burned on Range 109. No historic properties were affected.
- Incident No. 2020-02508: The wildland fire started on September 7, 2020, with fire suppression activities concluding the same day. Approximately 0.2 acres were burned on Range 111. No historic properties were affected.
- Incident No. 2020-02511: The wildland fire started on September 7, 2020, with fire suppression activities concluding the same day. Approximately 0.25 acres were burned on Range 111. No historic properties were affected.
- Incident No. 2020-02644: The wildland fire started on September 21, 2020, with fire suppression activities concluding the same day. Approximately 2 acres were burned on Range 103. No historic properties were affected.
- Incident No. 2020-02649: The wildland fire started on September 21, 2020, with fire suppression activities concluding the same day. Approximately 1 acre was burned on Range 111. No historic properties were affected.
- Incident No. 2020-02702: The wildland fire started on September 25, 2020, with fire suppression activities concluding the same day. Approximately 0.5 acres were burned on Range 111. No historic properties were affected.

#### *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.

#### *H. Other*

In Section III.D of the FY2019 Annual Report, inadvertent entries associated with the 2nd Infantry Brigade Combat Team “Warhorse Strike” Training Exercise held in September-October 2019 were reported at two sites: 5PE793 and 5PE2966. USAG Fort Carson determined no adverse effects to 5PE793 occurred as a result of the entry and adverse effects to 5PE2966 due to cumulative effects associated with military training have occurred. The after action report was submitted to the SHPO, Native American Tribes, and other consulting and interested parties on May 27, 2020. The SHPO concurred with the findings of effects via correspondence dated June 1, 2020 (HC #77880). Responses were also received from the City of Colorado Springs, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe. Consultation will continue

to discuss the appropriate mitigation to resolve for adverse effects to site 5PE2966 and develop a Memorandum of Agreement implementing the chosen mitigation effort.

Report compiled by:

Jennifer R. Kolise  
Cultural Resources Manager

Approved by:

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Digitally signed by THOMAS.GEORGE.WAYNE.1047060253  
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Wayne Thomas  
Chief, NEPA and Cultural Management Branch

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Carlos Rivero-deAguilar  
Chief, Environmental Division

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Hal Alguire  
Director, Public Works

**ENCLOSURE 1:**  
**ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY20 REPORTING PERIOD (OCTOBER 1, 2019, THROUGH SEPTEMBER 30, 2020) 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
2020-019 299th Brigade Engineer Battalion (BEB) Excavation Training Request, Training Area (TA) 28, Fort Carson	n/a	Downrange Fort Carson	FC C	10/9/2019	
2020-024 299 BEB Excavation Training Request, TA 28, Fort Carson	n/a	Downrange Fort Carson	FC C	10/17/2019	
2020-038 Renovate Range 117, Fort Carson	DPT19-025	Downrange Fort Carson	FC D1a	11/4/2019	2020-038 is the review of the lease. Undertaking has been previously reviewed under NEPA Project No. 2019-293.
2020-039 299 BEB Excavation Training Request, TA 20, Fort Carson	n/a	Downrange Fort Carson	FC C	11/5/2019	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-054, 2020-073, & 2020-309 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 PCMS Lettered TAs	FC D2b PC B4b2 PC C3B3	12/4/2019 12/20/2019	2020-054, 2020-073, 2020-309 are updated NEPA reviews. Several of the proposed locations were also reviewed as part of the FY18 & FY19 Prescribed Fire and Wildland Fuels Reduction Plan (NEPA Project No. 2018-001, 2018-004, 2018-119, 2018-205, 2018-333, & 2019-259).  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 Annual Report.
2020-055 Integrated Training Area Management (ITAM) Project in TA 30, Fort Carson (Task 21-176)	DPT20-006	Downrange Fort Carson	FC D2a	12/5/2019	Proposed work includes bank sloping and installing check dams along a gully in TA 30 to stabilize the landform. This project supports safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events.



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-056 ITAM Projects in TA 30, Fort Carson (Task 21-172), & TA 7, PCMS (Task 18-508)	DPT20-007	Downrange Fort Carson; PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	12/5/2019	<p>Task 21-172 is the rehabilitation of an existing elevated maneuver trail in TA 30 of Fort Carson. Proposed work includes bank sloping; adding water bars, and riprap; and repairing the road surface.</p> <p>Task 18-508 is the rehabilitation of Erosion Control Dam 2 in TA 7 of PCMS. Proposed work includes repairing the breach in the dam, installing a culvert, and removing trees along the dam. Both projects support safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events.</p> <p>Task 18-508 was previously reviewed under NEPA Project No. 2018-307</p>
2020-066, 2020-254, & 2020-308 Quarterly Record of Environmental Consideration (REC) for Training	DPT20QTR2 DPT20QTR4 DPT21QTR1	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/12/2019 7/9/2020 9/24/2020	<p>Per Fort Carson Regulation 200-1, each quarter the 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 aviation); excavation training, etc. It does not cover brigade training exercises, which are reviewed separately. In addition, excavation training is reviewed by the CRM on a case-by-case basis. Updated GIS layers of protected resource restrictions, as well as Standard Operating Procedures (SOPs) and cultural resources awareness training briefs for Fort Carson and PCMS are provided to the Directorate of Plans, Training, Mobilization, and Security (DPTMS) for planning purposes.</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
2020-069 Prairie Dog Control at Fort Carson and PCMS	DWP20-037	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	BE I.B3 FC D2b PC A3b PC B4b2	12/16/2019	Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; Ranges 11, 24, 29, 45, 104, 105, 109, 111, 115A, 115B, 117, 119, 139, 151, & 153 on Fort Carson; MOUT Site 11A at PCMS; and PCMS Airfield.
2020-072 1st Stryker Brigade Combat Team (1SBCT) Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	12/19/2019	
2020-075 299 BEB Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	12/30/2019	
2020-076 1SBCT Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	12/30/2019	
2020-081 2-23 Infantry (IN), 1SBCT Excavation Training Request, Range 127A, Fort Carson	n/a	Downrange Fort Carson	FC C	1/7/2020	
2020-090 1SBCT Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	1/15/2020	
2020-098 573rd Modular Control Team (MCT) Excavation Training Request, TA 14, Fort Carson	n/a	Downrange Fort Carson	FC C	1/23/2020	
2020-112 615 EN Company (CO) Excavation Training Request, TA 5, Fort Carson	n/a	Downrange Fort Carson	FC C	2/10/2020	
2020-113 Install Safety Protection Measures (Seibert Markers) along Gullied Areas with Steep Drop-Offs in TA 31 (Task 21-157)	DPT20-012	Downrange Fort Carson	FC D1c FC D2a	2/10/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-116 Aerial Imagery Collection by Unmanned Aerial System (UAS) on Fort Carson	n/a	Downrange Fort Carson	FC B	2/11/2020	
2020-117 299 BEB Excavation Training Request, TAs 10 & 11, Fort Carson	n/a	Downrange Fort Carson	FC C	2/12/2020	
2020-118 615 EN CO Excavation Training Request, TA 5, Fort Carson	n/a	Downrange Fort Carson	FC C	2/12/2020	
2020-121 Repair Bridge Safety Features Post-wide, Fort Carson	DPW20-012	Main Post Turkey Creek Complex Downrange Fort Carson	BE I.A2 FC D1b	2/13/2020	Forty bridges and culverts require repairs or upgrades to meet safety requirements. Twenty bridges / culverts are over 45 years old and had not been recorded or evaluated. Therefore, Section 106 consultation was required for these structures. The bridges / culverts were inventoried and evaluated for inclusion in the NRHP. All were determined ineligible for the NRHP. Section 106 consultation was completed in October 2020 for these 20 bridges / culverts. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA Annual Report, and Enclosure 1, Table 2 of the Fort Carson Downrange PA Annual Report.
2020-122 & 2020-261 Prepare Flat Level Surfaces for CONEX Containers, Range 131C	SFG20-005	Downrange Fort Carson	FC D1a	2/13/2020 7/7/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-124 Remove Towers, Fort Carson and PCMS	DPT16-016	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Training Area A	BE I.A3 FC D1d PC B4a4 PC D3a2	2/21/2020	<p>The proposed work includes dismantling six 50-foot and one 100-foot metal communication towers on Fort Carson and PCMS. The location of the towers on Fort Carson are: Bldg. 2135 (50-foot tower), Agony Hill (50-foot tower), and Range 155 (50-foot tower). The location of the towers on PCMS are: Dillingham (50-foot tower), Vouno (50-foot tower), Hogback (50-foot tower), and Cedar Hill (100-foot tower).</p> <p>2020-124 is an updated NEPA review, as it has been six months since previously reviewed and the project has not been initiated. In addition, there has been a change to the original project scope.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2016-290.</p>
2020-126 299 BEB Excavation Training Request, TAs 24 & 25, Fort Carson	n/a	Downrange Fort Carson	FC C	2/24/2020	
2020-128 299 BEB Excavation Training Request, TAs 38, 39, 41, 43, & 44, Fort Carson	n/a	Downrange Fort Carson	FC C	2/24/2020	
2020-129 4th Combat Aviation Brigade (CAB) "Eagle Strike" Training Exercise, Fort Carson and PCMS	n/a	Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	FC A FC B FC C PC A1 PC B1 PC B2 PC B3	2/25/2020	This training exercise was held at Fort Carson with only a Forward Area Refueling Point established at Piñon Canyon Maneuver Site.



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-130 299 BEB Excavation Training Request, TA 24, Fort Carson	n/a	Downrange Fort Carson	FC C	2/26/2020	
2020-136 Construct Concrete Pads, Range 143	DPT18-014	Downrange Fort Carson	FC D1a	3/2/2020	
2020-142 615 EN CO Excavation Training Request, TA 5, Fort Carson	n/a	Downrange Fort Carson	FC C	3/5/2020	
2020-143 & 2020-158 Construction and Maintenance of Amphibian Pitfall Traps, Fort Carson	DPW20-053 DPW20-057	Main Post Downrange Fort Carson	FC D.2a	3/5/2020 3/16/2020	2020-143 was cancelled; 2020-158 included updated site locations.  Section 106 consultation was required for the areas within the Main Post. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA Annual Report.
2020-144 FY2020 Invasive Species Control, Fort Carson and PCMS	DPW20-051	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	3/5/2020	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 has been provided to the proponent for avoidance of protected cultural resources.
2020-161 242nd Ordnance BN Excavation Training Request, TA 41, Fort Carson	n/a	Downrange Fort Carson	FC C	3/16/2020	
2020-184 Construct Shoot House, Range 131C	SFG19-019	Downrange Fort Carson	FC D1a	4/2/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-205 Furniture Moving Blanket Purchase Agreement	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs	BE I.A2 BE I.D2h BE I.D4 FC D1b PC A2b PC B4a2 PC C3a	5/4/2020	Proposed work includes moving furniture within or between buildings at Fort Carson and PCMS.
2020-211 Ditch Maintenance Route 1	SO1074325	Downrange Fort Carson	FC D2a	5/12/2020	Proposed work includes removing sediment from the ditch to restore proper flow, cleaning out the culverts, removing small trees at or below the ditch flowline, and maintaining the low water crossings.
2020-225 1SBCT Excavation Training Request, TAs 31, 35, 39, 40, 41, 42, 43, 51, 55, & 56, Fort Carson	n/a	Downrange Fort Carson	FC C	5/26/2020	
2020--239 A Company, 229 BEB Excavation Training Request, Range 153, Fort Carson	n/a	Downrange Fort Carson	FC C	6/8/2020	
2020-247 Expert Field Medical Badge Validation Event Excavation Training Request, TA 5, Fort Carson	n/a	Downrange Fort Carson	FC C	6/22/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-249 Construction, Maintenance, and Operation of Three Automated Infantry Squad Battle Courses (AISBCs)	PN76612 PN96134 PN96132	Downrange Fort Carson	FC D1a	6/22/2020	Two of the proposed AISBCs are located within existing ranges, Range 153 and Range 165; construction of these two AISBCs is considered an exempted undertaking under the Fort Carson Downrange PA. The third proposed AISBC is located in TA 25.  Section 106 consultation is required for the proposed AISBC in TA 25. See Enclosure 1, Table 2 of the Fort Carson Downrange PA Annual Report.
2020-259 Clay Stockpile Screening Operation at Tomahawk Clay Mine in TA 45, Fort Carson	CIV20-041	Downrange Fort Carson	FC D1a FC D1b FC D1c FC D1d	7/6/2020	General Shale operates the Tomahawk Mine located in TA 45 of Fort Carson. General Shale "campaign mines" the clay, which means mining occurs infrequently. The last campaign occurred in 2003. Clay stockpiles are created during the mining campaigns. These stockpiles that can last 5 to 20 years. The clay is then hauled by semi-trucks to the brick plant in Denver. The proposed project will continue to mine clay, create clay stockpiles, haul the clay to the plant, and remediate exhausted parts of the quarry within the existing footprint of the mine.
2020-264 Improve Firefighting Access Downrange Fort Carson	DIR19-007 DIR20-006	Downrange Fort Carson	FC D1b FC D2b	7/27/2020	Project includes grading existing two-track roads or firebreaks for firefighting access. Install appropriate drainage to include water bars, slopes, or peaked cuts to maintain the longevity of the access through the seasons.  2020-264 is a continuation of the project started last year.  Undertaking has been previously reviewed under NEPA Project No. 2019-095 & 2019-146.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-278 4ID Headquarters and Headquarters Battalion (HHBN) Excavation Training Request, TAs 11 & 12, Fort Carson	n/a	Downrange Fort Carson	FC C	8/11/2020	
2020-281 Install Conduit to Support Wiring, Range 150	DPT20-069	Downrange Fort Carson	FC D1a FC D1b	8/12/2020	
2020-282 64th Brigade Sustainment Battalion (BSB) Excavation Training Request, TAs 49 & 50, Fort Carson	n/a	Downrange Fort Carson	FC C	8/17/2020	
2020-286 4 EN BN Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	8/19/2020	
2020-295 152nd MCT Excavation Training Request, TA 14, Fort Carson	n/a	Downrange Fort Carson	FC C	8/31/2020	
2020-301 Renew General Shale's Transit License for the Tomahawk Mine	CIV20-048	Downrange Fort Carson	FC D1a FC D1b FC D1c FC D1d	9/10/2020	The existing transit license that allows General Shale access to the Tomahawk Mine will be renewed. The status quo mining activities will occur at the mine as a result of the license renewal. See NEPA Project No. 2020-259 for more details concerning typical mining activities at Tomahawk Mine.
2020-307 1-68 Armor Regiment (AR) Excavation Training Request, TAs 40 & 41, Fort Carson	n/a	Downrange Fort Carson	FC C	9/23/2020	
2020-314 1-8 Infantry Regiment Excavation Training Request, TA 40, Fort Carson	n/a	Downrange Fort Carson	FC C	9/30/2020	



**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
2020-058 ITAM Project in TA 24, Fort Carson (Task 19-109)	DPT19-019 DPT20-009	Downrange Fort Carson	12/5/2019	HC #76367 8/8/2019	<p>No historic properties affected.</p> <p>2020-058 is an updated NEPA review of the project, as it has been over six months since last reviewed and Task 19-109 has not been initiated.</p> <p>Section 106 consultation was completed for this task in August 2019 under NEPA Project No. 2019-211.</p> <p>A response was also received from the Pawnee Nation of Oklahoma agreeing with the finding of effects.</p>
2020-059 ITAM Projects in TA 30, Fort Carson (Tasks 21-167, 21-175, 21-177, 21-178, & 21-179)	DPT20-010	Downrange Fort Carson	12/5/2019	HC #77970 6/18/2020	<p>No historic properties affected.</p> <p>Responses were also received from the Northern Cheyenne Tribe and Pawnee Nation of Oklahoma; both agreed with the finding of effect.</p>
2020-088 & 2020-294 Construction and Operation of Ammunition Holding Area (AHA) in TA 10	PN97094	Downrange Fort Carson	1/14/2020 8/27/2020	n/a	<p>2020-088 gathered preliminary information about potential site locations. 2020-294 is the initial project review.</p> <p>Section 106 consultation has not yet been initiated.</p>

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
2020-121 Repair Bridge Safety Features Post-wide, Fort Carson	DPW20-012	Main Post Turkey Creek Complex Downrange Fort Carson	2/13/2020	HC #78612 10/19/2020	<p>Twenty bridges / culverts are over 45 years old and had not been recorded or evaluated. Therefore, Section 106 consultation was required for these structures. The bridges / culverts were inventoried and evaluated for inclusion in the NRHP. All were determined ineligible for the NRHP.</p> <p>No historic properties affected.</p> <p>Responses were also received from the City of Colorado Springs, Northern Arapaho Tribe, and Pawnee Nation of Oklahoma; all parties agreed with the finding of effects.</p>
2020-200 Construction and Operation of a Proposed High Voltage Electrical Power Test Facility	MCA17-002 SPC18-001	Downrange Fort Carson	4/27/2020	HC #72798 6/18/2020	<p>No historic properties affected.</p> <p>2020-200 is an updated NEPA review, as it has been over six months since the last review and project has not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2017-142, 2017-253, 2018-009, 2018-088 &amp; 2018-352.</p>
2020-249 Construction, Maintenance, and Operation of Three Automated Infantry Squad Battle Courses (AISBCs)	PN76612 PN96134 PN96132	Downrange Fort Carson	6/22/2020	n/a	<p>Section 106 consultation is required for the proposed AISBC in TA 25. Consultation has not been initiated.</p>

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
2020-260 Install Three-Phase Electrical Power to Range 123, Fort Carson	RES16-005	Downrange Fort Carson	7/7/2020	n/a	<p>No adverse effects to historic properties</p> <p>Section 106 consultation for the second change in project scope and location was initiated on 6/3/2020. Via correspondence dated 7/1/2020, the SHPO requested that unsurveyed portions of the APE that lie outside the jurisdictional boundary of Fort Carson be inventoried for historic properties. The Colorado Air National Guard through Black Hills Energy engaged Alpine Archaeology to conduct the inventory. Fieldwork has been completed as of 10/26/2020, and the Fort Carson CRM is awaiting site documentation and associated technical report of investigations to review.</p> <p>Responses were also received from the Assiniboine &amp; Sioux Tribes of the Fort Peck Reservation, Northern Arapaho Tribe, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma; all agreed with the finding of effects.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2017-077 &amp; 2019-163.</p>

**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
2020-060 4th Infantry Division (4ID) Helicopter Landing Zone Booklet Review	n/a	n/a	12/4/2019	Document review
2020-299 Programmatic Environmental Assessment for the Fielding of Armored Multi-Purpose Vehicle (AMPV)	n/a	n/a	9/8/2020	This is a review of the preliminary draft Programmatic Environmental Assessment to analyze the environmental and socioeconomic impacts with the fielding of the new AMPV. Fort Carson is one of the installations proposed to receive the AMPV, which will replace the older M113 family of vehicles. If Fort Carson is chosen, the required construction and training needs associated with this new vehicle will be further analyzed.



**ENCLOSURE 2:**  
**FORT CARSON DOWNRANGE PA TASK TRACKER**  
**(CURRENT AS OF SEPTEMBER 30, 2020)**

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>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. Fieldwork has been completed at the 11 isolated finds.</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><b>Protection strategies have been implemented at these sites.</b></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 28-30, 2020, at PCMS. In attendance were representatives from the Cheyenne River Sioux Tribe, Eastern Shoshone Tribe, Jicarilla Apache Nation, Northern Arapaho Tribe, Pawnee Nation of Oklahoma, Southern Ute Indian 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>
III.E	Provide training vehicles/aircraft with means of knowing site locations	3 years after signing	03/30/2017	<p>Completed; update as necessary.</p>
IV.A	Monitor protected cultural properties	Ongoing action	n/a	<p>Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections.</p> <p>FY20: Contract awarded in April 2020 to assist with monitoring activities.</p>

Stipulation	Action	Duration	Date Required	Remarks
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.  Site visits are on hold due to COVID-19 pandemic.
VI.B	Offsetting mitigation: Archaeological Context Project	Initiate within 3 years of signing	03/30/2017	An Advisory Committee meeting was held on 11/20/2019 to discuss Phase II of the project.  USAG Fort Carson will be moving forward with a Historic Mining Context Study. The Performance Work Statement was reviewed by the Advisory Committee. Contract should be awarded in FY21.
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 11/20/2019.
VII.G	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017.  The 5-year update will be initiated in November 2020.

**ENCLOSURE 3:**  
**USAG FORT CARSON'S RESPONSE TO SHPO'S COMMENTS ON FY18 & FY19 ANNUAL**  
**REPORTS**





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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](mailto:lindsay.johansson@state.co.us), Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or [jason.obrien@state.co.us](mailto:jason.obrien@state.co.us), or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto: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**

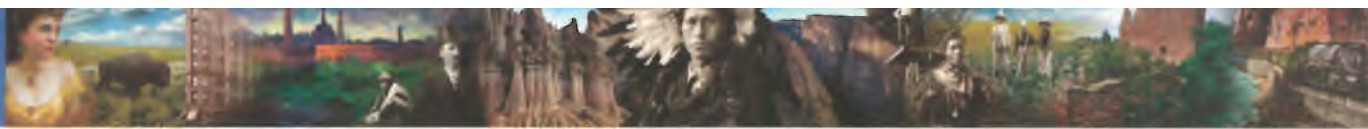
No comments.

**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.





**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.



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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.





**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").



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

December 30, 2019

Mr. Steve Turner, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Mr. Turner:

Thank you for your correspondence dated November 29, 2018, concerning your review of the fiscal year (FY) 2018 annual reports for the three programmatic agreements. The intention of this letter is to provide you an update on our continuous efforts to train Soldiers and their chain of command on cultural resources and the need to protect them. We also would like to address your comments regarding documentation of cultural resources and mitigation for adverse effects.

With regard to our Cultural Awareness Training program, we sincerely appreciate your observations and understand your questions regarding its overall effectiveness given the statistics you used for your evaluation, however we do not agree with your overall conclusions. In fact, we feel that the training program has been quite effective in raising the awareness level of Fort Carson Soldiers and military leaders, and has contributed greatly to opening communication and establishing cooperative planning lines with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like Directorate of Plans, Training, Mobilization and Security (DPTMS) which are involved with us in planning and executing military training. This cooperative work, which did not exist a few years ago, has in our opinion greatly reduced the potential for and actual impacts to the resources considering the potential for adverse effects associated with military training and heavy use of the land. We also feel an obligation, in light of your comments, to explain the program better for you and your staff, and will try to describe better how the different types of military training, operational tempo, training objectives and scenarios, type of brigade (i.e., Aviation vs Armored vs Stryker etc.), weather, land area used, and other similar factors, can contribute to the number of inadvertent entries outcome. We understand how one could easily come to different conclusions on the overall effectiveness of our training program without having a good understanding of how these military training nuances can affect the effects outcome or the perception of the outcome. In the following paragraphs, we will do our best to explain these contributing factors and hopefully illustrate better the effectiveness of our training program and our vigorous efforts to protect cultural resources.



As an example, you suggest we amend and adjust our cultural awareness training program based on the quantitative data (i.e. the number of inadvertent entries reported for past brigade training exercises) at the Piñon Canyon Maneuver Site (PCMS). What the suggestion does not take into account with regard to our training program is how successful it has been and how few inadvertent entries actually have occurred at Fort Carson, despite the considerably higher operational tempo of maneuver training throughout the year. Further, we feel that focusing on one type of training (i.e., brigade) is not a reliable indicator of overall effectiveness of the cultural awareness training. Each brigade exercise is designed to meet specific training objectives; therefore, no two training scenarios are exactly alike, especially if comparing the Stryker brigade's exercise to the armored brigade's exercise to the infantry brigade's exercise to the combat aviation brigade's exercise. There are significant differences in the type and number of training assets utilized, and the amount of space required as they move across the landscape. For example, the training exercise by the 4<sup>th</sup> Combat Aviation Brigade (4CAB) conducted in 2018 at Fort Carson and PCMS resulted in no inadvertent entries. However, the 4CAB was not better educated in cultural resources awareness than the other brigades. Their training footprint on the ground was much smaller than other brigade exercises, since they are primarily doing air-to-ground force training and not ground-to-ground force training.

Also, as mentioned, other factors like weather play a significant role in the number of entries that could potentially occur during an exercise. For instance, during the 2013 exercise, which had the second lowest number of inadvertent entries reported, training had to be halted due to the adverse weather conditions. For several days, training assets were unable to move across the landscape due to the severe weather conditions.

Similarly, the size and area covered during the training event has a direct effect on the number of protected resources inadvertently entered. For example, after the 3<sup>rd</sup> Armored Brigade Combat Team's (3ABCT) exercise in 2018, a total of 355 protected cultural resources were inspected due to the expansive land area used. Previous exercises required site inspections in the range of 179 to 211. Each training exercise is unique for each unit and unit type, and different training scenarios require different amounts and variety of terrain. So it is difficult to use the number of sites entered as the only criteria for success or failure of the cultural awareness training program.

As pointed out above, what speaks to the success of the cultural resource awareness training in our opinion is how much the unit leaders and exercise planners are involving the Cultural Resources Program staff in preplanning activities in recent years. Our Cultural Resources Program is now involved in all battalion and brigade pre-exercise working group meetings. The Cultural Resources Manager provides, in addition to Environmental Protection Officer training, cultural resources briefs at the



Observer/Controller Team (O/CT) Academy which is held prior to the start of each brigade exercise. Further, the Program, in collaboration with DPTMS, produced a few years ago, a Cultural Awareness video, posted on the Fort Carson web site, which is used regularly to educate Soldiers, unit leaders and Command, in addition to required awareness training prior to major maneuver military training. Cultural Program staff these days are also able to ride-along with Range Inspectors during the exercise, something that did not happen a few years ago. Furthermore, thanks to our efforts, well-trained DPTMS Range Inspectors have been instrumental in moving units away from protected resources and other areas in which the unit is not supposed to be, and letting our Program staff know if protected resources have been entered. It is worth pointing out as well that during execution of past exercises, the Cultural Resources Manager and our PCMS archaeologist have observed units utilizing the resource protection map during pre-movement planning, as well as the O/CTs using the maps to verify that units are not training within restricted areas.

The Cultural Resources Program does regularly review its training materials and methods of dissemination to achieve maximum results. As you may or not be aware, we used community e-newsletters, social media, news print, Maneuver Damage Training, and standard annual training in addition to Environmental Protection Officer Training. We actively seek feedback on the training materials we produce. We would welcome any examples your office may have of other effective cultural resource awareness training used successfully elsewhere. We hope above illustrates our hard work and effectiveness of our awareness training program and the intrinsic difficulties associated with evaluating its success. We can assure you that we will continue our efforts and will do our best to identify additional ways to improve it.

With regard to other comments in your letter, as you know, with limited budgets, our cultural resource projects must be prioritized based on Army mission needs. In collaboration with the Directorate of Plans, Training, Mobilization, and Security, we have developed prioritization criteria for evaluating, mitigating, and marking of resources. Our project focus has been on the assessment of needs data archeological resources and protection of those determined to be historic properties. Additionally, we have been implementing our site monitoring/inspection program to best evaluate the site protection effectiveness. Active projects contracted in support of these priorities are research designs for the evaluation of 21 resources at Fort Carson and 71 resources at PCMS. In addition, 11 isolated finds at Fort Carson and 58 isolated finds at PCMS will be documented and evaluated to modern-day standards.

On another related matter, your letter suggests we have not prioritized mitigation projects associated with the Fort Carson Downrange PA. However, for us, these mitigation projects are one of our program's top priorities. The Mitigation Projects Advisory Committee was developed, and the first meeting was held in June 2015. The



scope of work for the first phase of the Archaeological Context Mitigation Project was drafted in coordination with the advisory committee, and the contract awarded in August 2016. The first phase of the project was completed in August 2018. USAG Fort Carson is coordinating with the Mitigation Projects Advisory Committee to determine other projects to complete for the second phase of the mitigation project. Similarly, USAG Fort Carson has been in consultation with the Tribes on the best use of mitigation funds for the Native American Ethnographic Oral History Project. Originally during the Annual Tribal Consultation meeting in January 2015, it was suggested to use these mitigation funds to develop Tribe-specific education videos. USAG Fort Carson pursued this idea, until it was learned through further discussions at the following annual meeting that it was no longer supported by the Tribes. As a result of ongoing consultation, it was decided to conduct a holistic traditional use study of the Hogback at PCMS. We have worked with the Tribes in the development of the project's scope of work, and the contract was awarded in September 2019.

The Bent's Fort Chapter of the National Santa Fe Trail Association briefed the Mitigation Projects Advisory Committee on an idea for the Santa Fe Trail Community Outreach Project. The committee requested a more formal proposal from the organization to include proposed budget and deliverables. After several attempts to engage the designated representative from the Bent's Fort Chapter, the formal proposal has not been provided.

USAG Fort Carson is consulting with the Tribes on the re-assessment of the Turkey Creek Rock Art Historic District (5PE14). Two site visits have been conducted. Another visit was scheduled for October 2019, but had to be canceled due to lack of Tribal participation. As this district is a property of traditional, religious, and cultural importance, we will continue our collaboration with the Tribes to develop criteria for how the district will be defined and managed in the future.

All signatories associated with the Fort Carson and PCMS training programmatic agreements have acknowledged that training activities across the landscape could have the potential to result in adverse effects to historic properties. You and the Advisory Council on Historic Preservation agreed military training is exempted from further Section 106 consultation with the stipulation that training is not authorized to occur within protected resources. There are also stipulations to conduct inspections of protected resources to determine if these sites are being impacted from training activities. The agreements further stipulate that if adverse effects are noted, then USAG Fort Carson would initiate consultation to resolve for those effects in accordance with 36 CFR 800.6. We have determined sites have been adversely affected due to past military training activities. With the information we have gleaned from our investigations and discussions with the training community, the USAG Fort Carson is working to develop a mitigation strategy. We are currently drafting mitigation plans for

36 sites at PCMS that will help to inform our decision on the best strategy to employ. We plan to initiate discussions with your staff in the near future to develop and execute memorandums of agreement to resolve for some of the acknowledged adverse effects from past training.

To address the comments from your enclosures see the attached enclosures 1, 2, and 3.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Carl R. deAguilar', written over a horizontal line.

Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures



**Enclosure 1:**  
**USAG Fort Carson's Response to 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.*

USAG Fort Carson did not feel a response to the Colorado Council of Professional Archaeologists was required, as they agreed with the finding of effect as long as 1) the color of the silicone sealant used on Building 10015's roof was consistent with the original color of the roof, and 2) the visual impacts from leaving the concrete footing associated with the grain silo would be minimized.

The Section 106 undertaking review documentation provided the product specifications, to include the color to be used, and photographs of the existing roof color and condition. As seen in the photographs provided, the roof is currently painted white; the sealant color is also white.

In reference to the grain silo footings being seen after the silo removal, the Section 106 photographs provided show that the footing are flush with the ground surface. Therefore, there would be no visual impacts from leaving the footings in situ.

**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.*

Thank you for your comment.

H.

*No comments.*



**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2018 Fort Carson  
Downrange 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.*

Thank you for your comment.

**III. Action Updates**

**A. Status of Task 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 (5PE14) 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 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.*

Thank you for your comment. USAG Fort Carson is collaborating with culturally affiliated Native American Tribes in the development of criteria for the definition and management of the Turkey Creek Rock Art Historic District. Once these criteria have been developed, we will continue consultation with your office on the district boundaries and its contributing and non-contributing sites.

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

In correspondence dated February 26, 2018, and March 7, 2018 (HC #63877), you did not concur with the determination of eligibility for sites 5EP6171, Lytle Ditch, and 5EP6641.1, an isolated T-shaped concrete structure thought to be a culvert to channel water from the small channel on the southwest side of the culvert into the main channel of Turkey Creek on the northeast side in southeastern corner of Turkey Creek Complex. We are currently drafting an irrigation network context study that will address many of



your questions. These sites continue to be treated as protected resources until this matter can be resolved.

*III.E: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to 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.*

The stipulation 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..." USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems, but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

#### 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.*

This comment has been addressed in the body of the letter.

#### 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.*

This is not a good example of "the disconnect between individuals at various command levels." The portable latrines were placed there by a private contractor, not the military unit conducting the exercise. The Contracting Officer's Representative contacted the contractor to resolve the issue once noticed by our Conservation Law Enforcement staff. This event provided us an opportunity to place additional safe guards for contractor delivered latrines in the future.

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.*

The After Action Report has been mailed to your office in mid-December 2019.

F. Amendment

*See comment III.A.I.C above.*

We do not understand how your comment on III.A.I.C above relates to proposed amendments to the Fort Carson Downrange PA.

G. Dispute Resolution

*No comments.*



**Enclosure 3:**  
**USAG Fort Carson's Response to 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 resources 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.*

Thank you for your comment. As part of the Section 106 undertaking review process, the Cultural Resources Manager (CRM) does assess the need for surveying the area of potential effects (APEs). Depending on the location and type of the proposed undertaking, the CRM may decide to re-survey an area or have an archaeological monitor on site. The implementing regulations for Section 106 of the National Historic Preservation Act calls for a "reasonable and good faith effort" to identify historic properties (not cultural resources) within an undertaking's APE. The CRM reviewed all available data, and given the project location and the potential for historic properties, determined re-survey of these APEs are not warranted. Based on geoarchaeological investigations, there is low potential for intact cultural materials in arroyo affected by cutting, unless it is a very recent cutting event (less than 500 years ago), then there may be moderate potential for cultural materials (Andresky 1990; Schuldenrein 1985). If a historic property should exist within these areas, it would most likely be buried; as such, traditional survey methods would not identify these properties. Therefore, the PCMS Archaeologist will monitor this project, which is a CRMP best management practice for these types of projects. The USAG Fort Carson also has a standard operating procedure for the inadvertent discovery of cultural materials, which is provided to project proponents for dissemination.



### III. Action Updates

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

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles, on the Hogback, and along or in canyon areas that are designated for dismounted maneuver. We acknowledge that vehicle entries do inadvertently occur to some of these "Need Data" sites, but resources are being directed to place a higher level of protection to known historic properties. In addition, the SHPO concurred with our protection management strategy for needs data sites as listed in Appendix 2 of the PCMS PA when the amendment was signed in April 2018.

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. Physical protection measures will never be foolproof. Even sites that have boulders, in addition to the Seibert markers or fencing, have been entered. These measures are just one of the levels of protection measures in place. The Seibert markers have worked well as a deterrent. We have seen many cases where vehicles have driven up to the site, then turned around when they came upon the markers. And even with some of the reported entries, the vehicle entered and then immediately backed out or turned around and exited the site when the Seibert markers were observed. Although not perfect this is why there is a provision in the 36 Code of Federal Regulations Part 800 to address resolution of adverse effects.

*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.*

The stipulation 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...” USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems (GPS), but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

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.*

This comment has been addressed in the body of the letter.

C. Brigade Training Exercises

*We suggest that all training exercises have the potential to adversely affect historic properties 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.*

This comment has been addressed in the body of the letter.

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.*

Thank you for your comment.

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

"None (Administrative)" is defined as resources requiring administrative protection measures, as defined in the PCMS PA, that do not have any physical markers in place.

"None (Nominal)" is defined as resources requiring nominal protection measures, as defined in the PCMS PA, that do not have any physical markers in place. Due to high potential for looting, these sites are not marked.

"None (Standard)" is defined as resources requiring standard protection measures, as defined in the PCMS PA, that do not have any physical markers in place. None of the protected resources should have been listed as such in Appendix 2, but there were seven sites that were listed as "None (Standard):" 5LA3269, 5LA3300, 5LA3387, 5LA4399, 5LA5698, 5LA6108, and 5LA7443. A review of our Geographic Information Systems (GIS) data and site documentation shows the table was in error. At the time of the drafting of the FY18 Annual Report: sites

- 5LA3269, 5LA3300, and 5LA5698 should have been categorized as Seibert Markers – Corners only (Standard). These have since been fully marked with Seibert markers.
- 5LA3387 should have been categorized as Seibert Markers, Protection Fence, & Terrain (Standard), as it is located within a large area containing several sites that are surrounded by a combination of fencing and Seibert markers.
- 5LA4399 and 5LA7443 should have been categorized as Seibert Markers – Corners only & Terrain (Standard). The Integrated Training Area Management (ITAM) Program has awarded a contract to complete the marking of these sites.

- 5LA6108 seems to be the only site that lacks any physical protection measures. It will be marked as part of the ITAM site marking project this year

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").*

Thank you for your comment.



Wayne



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

JAN 15 2020

Re: Fiscal Year (FY) 2019 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear M. Rivero-deAguilar:

Thank you for your emailed correspondence dated 15 November 2019 and received by our office electronically the same day regarding review of the Fiscal Year 2019 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.

Similar to our comments on the FY2018 annual report, our first 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.

Again, we also 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 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. Training cannot be only from the "bottom up" or "top down," but should incorporate varying pedagogies, methods, and should be targeted at varying groups.

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](mailto:lindsay.johansson@state.co.us), Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or [jason.obrien@state.co.us](mailto:jason.obrien@state.co.us), or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto: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**

**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 PA. We anticipate working closely together during Fiscal Year 2020 on additional portions of the agreement.

**H.**

No comments.



**Attachment 2:**  
**SHPO Comments on FY2019 Down Range Fort Carson PA Annual Report (HC#63877)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

2019-134, 163: Our office looks forward to consultation on these undertakings.

2019-321: We request to be involved in resolution of the concerns expressed by consulting parties.

**III. Action Updates**

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

I.C: As detailed in Enclosure 2, we have not provided concurrence on eligibility for several sites. Additionally, other sites are categorized as needs data. We feel that several issues are contributing to the situation.

One issue is the fact that USAG Fort Carson has not yet documented and reevaluated the Turkey Creek Rock Art District. As discussed during the August 16-18, 2017 Turkey Creek Rock Art District Tribal Consultation Meeting, U.S. Army Garrison (USAG) Fort Carson is working to proactively improve its management of the Turkey Creek Rock Art District (TCRAD). One method is to evaluate the existing district and create an amendment to the district nomination documentation to reflect current surveys and Tribal consultation. Loendorf et al. (2017:9.3) puts forward three of the many options available. Our office views TCRAD Approach 2 as the preferred option. This solution was previously put forward by Zier et al. (1997), and we see this as the option which is the most in keeping with the intentions of the preservationists who originally nominated the "Indian Petroglyphs and Pictographs/Turkey Creek Canyon" district for listing in the National Register in 1976. TCRAD Approach 2 would allow for a geographically unified district that represents not only a landscape feature (the drainage) but would also include all sites associated with prehistoric use of that feature, rather than isolating rock art from other human uses of the landscape with which the rock art may be associated. In order to properly evaluate many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district. We request that renewed effort be placed on this during FY2020.

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, particularly when "administrative protections" are the only methods being used.

VI.B: Please include timetables and anticipated for completion of offsetting mitigation efforts.

**B. Cultural Resource Awareness Training**



We appreciate USAG Fort Carson's willingness to address our 29 November 2018 requests for an assessment of the effectiveness of the training program. We also appreciate USAG Fort Carson's 30 December 2019 letter that provided additional information concerning the current training activities. To reiterate, while we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.

Again, 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 appreciate USAG Fort Carson's efforts to document inadvertent entries, but feel that the continuing incidents further reinforces our position that the current method(s) of education are only minimally effective. Additionally, while each individual entry may not result in an adverse effect, we maintain our position that cumulatively, these incidents are proof that military use of these landscapes are an adverse effect to historic properties.

#### D. Inadvertent Discoveries

No comments.

#### E. Emergency Response

No comments.

#### F. Amendment

No comments.

#### G. Dispute Resolution

No comments.



**Attachment 3:**  
**SHPO Comments on FY2019 PCMS PA Annual Report (HC#65747)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

No comments.

**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 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**

As stated above, 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.

D. Inadvertent Entries and/or Impacts to Historic Properties

See comment C above. We look forward to continued consultation to resolve the effects of previous training exercises.

E. Inadvertent Discoveries

No comments.

F. Emergency Response

No comments.

G. Amendment

No comments.

H. Other

No comments.



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

REPLY TO  
ATTENTION OF

October 30, 2020

Mr. Steve Turner, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Mr. Turner:

Thank you for your correspondence dated January 15, 2020, concerning your review of the fiscal year (FY) 2019 annual reports for the three programmatic agreements. The intention of this letter is to address your comments on mitigation efforts to resolve for adverse effects related to military use of Fort Carson and Piñon Canyon Maneuver Site (PCMS) and our cultural resources awareness training program.

The Advisory Council on Historic Preservation, Colorado State Historic Preservation Officer, and U.S. Army Garrison (USAG) Fort Carson acknowledged military use of Fort Carson and PCMS does have the potential to result in direct, indirect, and cumulative adverse effects to historic properties. All signatories to the programmatic agreements agreed military training is exempted from further Section 106 consultation with the stipulation that training is not authorized to occur within protected resources at both Fort Carson and PCMS, and is not authorized to occur within unsurveyed areas at PCMS, with the exception of foot traffic. There are also stipulations to conduct inspections of protected resources to determine if these sites are being impacted from training activities at Fort Carson and PCMS, as well as the stipulation to conduct after action inspections of protected resources after all brigade exercises at PCMS. This very robust monitoring provides transparent and real-time feedback to our partners on how effective our protection measures are working. The agreements further stipulate that if adverse effects are noted, then USAG Fort Carson would initiate consultation to resolve for those effects in accordance with 36 CFR 800.6.

*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 Down Range Fort Carson (Fort Carson Downrange PA) does include mitigation measures to resolve for adverse effects at 22 cultural resources and unrecorded historic properties that may exist within areas exempted from cultural resources survey. These mitigations were included in the programmatic agreement because U.S. Army Garrison (USAG) Fort Carson recognized the potential direct, indirect, and cumulative adverse effects to historic properties from military use of downrange Fort Carson. It is also one of the reasons why the Fort Carson Downrange PA includes a stipulation to routinely inspect*

and monitor protected resources and inform your office of any inadvertent entries or other impacts.

Since the implementation of the Fort Carson Downrange PA in 2014, eight sites have been entered as a result of military training: 5EP161, 5EP117, 5EP2524, 5EP5974, 5EP7602, 5EP8157, 5PE793, and 5PE2966. One of these eight (5EP161) was impacted by Contractors who placed portable latrines within the perimeter of the site in support of a military training exercise, and not by Soldiers training. Site 5PE2966 has been entered three times since 2017; as a result, USAG Fort Carson determined cumulative adverse effects due to military training were occurring at this historic property. You concurred with our finding of effects via correspondence dated June 1, 2020 (HC #77880). We also determined cumulative adverse effects due to erosion and military training were occurring at 5PE8157 with which you concurred via correspondence dated September 30, 2020 (HC #63877). The Fort Carson Cultural Resources Manager is working with your office to develop appropriate mitigations to resolve for adverse effects at these two sites.

Based on the few sites that have been entered since 2014 and the amount of military training that occurs downrange on a daily basis, we do not agree with your suggestion to initiate additional consultation to mitigate the direct, indirect, and cumulative adverse effects related to military use of downrange Fort Carson on a broad scale. Instead, USAG Fort Carson will continue to consult on a case-by-case basis when inadvertent entries or other impacts occur, and if we find that adverse effects are occurring or have occurred at the historic property, we will initiate consultation at that time to resolve for those adverse effects.

We do agree an overarching approach to mitigation is the best course of action to resolve for potential direct, indirect, and cumulative adverse effects resulting from military use of the PCMS. This is the approach we are pursuing as we continue consultation to resolve for adverse effects to historic properties from past brigade exercises. USAG Fort Carson has been working on developing mitigation plans for 36 historic properties at PCMS that have been adversely affected or have been entered during multiple exercises, as discussed at the Annual Programmatic Agreement Meeting with your office and consulting and/or interested parties. These mitigation plans will help inform our decision on the best strategy to employ and be ready to discuss various types of mitigation with your office, Native American Tribes, and other consulting and/or interested parties as we continue consultation to resolve for adverse effects.

In our December 30, 2019, letter we discussed at length why one cannot use quantitative data based on the number of inadvertent entries that occurred during brigade exercises to assess the effectiveness of our cultural resources awareness training program. What speaks to the success of the cultural resource awareness training in our opinion is the open communication and the establishment of cooperative planning lines with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like the Directorate of Plans, Training, Mobilization and Security,



that are involved in planning and executing military training. These entities regularly engage Cultural Resources Program staff in preplanning activities, such as battalion and brigade pre-exercise working group meetings. The majority of the individuals involved in these meetings are lieutenants, captains, majors, and lieutenant colonels. This collaboration has in our opinion greatly reduced the potential for and actual impacts to the resources associated with military training and heavy use of the land.

The Cultural Resources Program does regularly review its training materials and methods of dissemination to achieve maximum results. As stated in our December 30, 2019, letter, we would welcome any examples your office may have of other effective cultural resource awareness training used successfully elsewhere. We can assure you that we will continue our efforts and will do our best to identify additional ways to improve it.

The Department of Army has developed an organization (Training and Doctrine Command Culture Center), which is responsible for developing and delivering appropriate cultural resources awareness training to all Army leaders, this includes field grade and general officers. This training is provided at various times in each Soldier's career through formal education and assignment specific training.

To address the comments from your enclosures see the attached enclosures 1, 2, and 3.

Point of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,

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Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures

**Enclosure 1:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 Fort Carson Built Environment PA Annual Report (HC #58731)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*No comments*

**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 PA. We anticipate working closely together during Fiscal Year 2020 on additional portions of the agreement.*

Thank you for your comment.

H.

*No comments.*



**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 Fort Carson**  
**Downrange PA Annual Report (HC #63877)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*2019-134, 163: Our office looks forward to consultation on these undertakings.*

Section 106 consultation has not been initiated for 2019-134.

Section 106 consultation is ongoing for 2019-163 Installation of Three-Phase Electrical to Range 123. Via correspondence dated July 1, 2020 (HC #75708), your office requested an inventory for historic properties to be completed on the portion of area of potential effects that lies outside of the jurisdictional boundary of Fort Carson. Your office was provided an opportunity to review and comment on the research design for the cultural resources survey. Fieldwork has been completed, and the Fort Carson Cultural Resources Manager is waiting for the draft site documentation and associated technical report of investigations to be submitted by Alpine Archaeology for review and comment.

*2019-321: We request to be involved in resolution of the concerns by consulting parties.*

Your office was involved in the resolution of the concerns by consulting parties. Additional Section 106 consultation was completed for the revised area of potential effects in March of 2020.

**III. Action Updates**

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

*I.C: As detailed in Enclosure 2, we have not provided concurrence on eligibility for several sites. Additionally, other sites are categorized as needs data. We feel that several issues are contributing to the situation.*

*On issue is the fact that USAG Fort Carson has not yet documented and reevaluated the Turkey Creek Rock Art District. As discussed during the August 16-18, 2017 Turkey Creek Rock Art District Tribal Consultation Meeting, U.S. Army Garrison (USAG) Fort Carson is working to proactively improve its management of the Turkey Creek Rock Art District (TCRAD). One method is to evaluate the existing district and create an amendment to the district nomination documentation to reflect current surveys and Tribal consultation. Loendorf et al. (2017:9.3) puts forward three of the many options available. Our office views TCRAD Approach 2 as the preferred option. This solution*

*was previously put forward by Zier et al. (1997), and we see this as the option which is most in keeping with the intentions of the preservationists who originally nominated the "Indian Petroglyphs and Pictographs/Turkey Creek Canyon" district for listing in the National Register in 1976. TCRAD Approach 2 would allow for a geographically unified district that represents not only a landscape feature (the drainage) but would also include all sites associated with prehistoric use of that feature, rather than isolating rock art from other human uses of the landscape with which the rock art may be associated. In order to properly evaluate many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district. We request that renewed effort be placed on this during FY2020.*

Thank you for your comment. USAG Fort Carson is collaborating with culturally affiliated Native American Tribes in the development of criteria for the definition and management of the Turkey Creek Rock Art Historic District. Once these criteria have been developed, we will continue consultation with your office on the district boundaries and its contributing and non-contributing sites. Due to travel restrictions associated with COVID-19, a site visit to view and discuss other portions of the Turkey Creek drainage did not occur this year. USAG Fort Carson believes it would be best to conduct a traditional use study of the Turkey Creek drainage, similar to the study being conducted for the Hogback at Piñon Canyon Maneuver Site, and we will be requesting funds for this project in the future.

*III.E: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to 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, particularly when "administrative protections" are the only methods being used.*

The stipulation 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..." USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems, but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. USAG Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

## **B. Cultural Resource Awareness Training**

*We appreciate USAG Fort Carson's willingness to address our 29 November 2018 request for an assessment of the effectiveness of the training program. We also appreciate USAG Fort Carson's 30 December 2019 letter that provided additional information concerning the current training activities. To reiterate, while we view the*

*current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.*

*Again, 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.*

This comment has been addressed in the body of the letter.

C. Inadvertent Entries and/or Impacts to Historic Properties

*We appreciate USAG Fort Carson's efforts to document inadvertent entries, but feel that the continuing incidents further reinforces our position that the current method(s) of education are only minimally effective. Additionally, while each individual entry may not result in an adverse effect, we maintain our position that cumulatively, these incidents are proof that military use of these landscapes are an adverse effect to historic properties.*

This comment has been addressed in the body of the letter.

D. Inadvertent Discoveries

*No comments.*

E. Emergency Response

*No comments.*

F. Amendment

*No comments.*

G. Dispute Resolution

*No comments.*



**Enclosure 3:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 PCMS PA Annual Report (HC #65747)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*No comments.*

**III. Action Updates**

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

*I.B: We suggest that administrative protections, such as those provided to the 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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles, on the Hogback, and along or in canyon areas that are designated for dismounted maneuver. We acknowledge that vehicle entries do inadvertently occur to some of these "Need Data" sites, but resources are being directed to place a higher level of protection to known historic properties. In addition, the SHPO concurred with our protection management strategy for needs data sites as listed in Appendix 2 of the PCMS PA when the amendment was signed in April 2018.

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. Physical protection measures will never be foolproof. Even sites that have boulders, in addition to the Seibert markers or fencing, have been entered. These measures are just one of the levels of protection measures in place. The Seibert markers have worked well as a deterrent. We have seen many cases where vehicles have driven up to the site, then turned around when they came upon the markers. And even with some of the reported entries, the vehicle entered and then immediately backed out or turned around and

exited the site when the Seibert markers were observed. Although not perfect, this is why there is a provision in the 36 Code of Federal Regulations Part 800 to address resolution of adverse effects.

*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 no 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.*

The stipulation 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...” USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems (GPS), but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. USAG Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

#### B. Cultural Resource Awareness Training

*As stated above, 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 ranking soldiers, these measures may be more effective.*

This comment has been addressed in the body of the letter.

#### C. Brigade Training Exercises

*We suggest that all training exercises have the potential to adversely affect historic properties 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*

This comment has been addressed in the body of the letter.

#### 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 previous training exercises.*

Thank you for your comment.

E. Inadvertent Discoveries

*No comments.*

F. Emergency Response

*No comments.*

G. Amendment

*No comments.*

H. Other

*No comments.*



**FISCAL YEAR (FY) 2020 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, 2020**

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, 2019, through September 30, 2020, 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) during the reporting year. Sixteen 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). One undertaking required Section 106 consultation. Section 106 consultation has been completed for 2020-057 ITAM Projects, TA 10, PCMS (Tasks 18-511 & 18-512).

The following is an update to the status of Section 106 consultation continuing from the fiscal year 2019 reporting period:

- 2019-285 Install Cellular Tower, PCMS: Section 106 consultation has not been initiated. The CRM requested additional information from the proponent, which includes a viewshed analysis, to analyze what effects the undertaking may have on historic properties within the area of potential effects.
- 2019-321 Operation of the MQ-1C Gray Eagle or Similar Unmanned Aerial System in National Airspace: Due to a change in project scope, another Section 106 undertaking review packet was submitted to the SHPO, Native American Tribes, and other consulting and interested parties in January of 2020. USAG Fort Carson determined the undertaking would not have adverse effects to historic properties.

The SHPO concurred with the finding of effects via correspondence dated January 27, 2020 (HC #76656) on the revised undertaking. Responses were also received from the City of Colorado Springs, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effects.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRM. One project is a document review, one is review of an agreement renewal, and one is a review of Programmatic Environmental Assessment.

### **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 September 2020
- 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 January 15, 2020 (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 suggested all “command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be given similar training on a regular basis” as that provided to “soldiers at the unit level.” The SHPO emphasized cultural awareness training that targets various audiences would make protection measures more effective.

Enclosure 3 includes the SHPO’s January 15, 2020, letter, and the USAG Fort Carson’s response to the SHPO dated October 30, 2020.

### *C. Brigade Training Exercises*

The 4<sup>th</sup> Combat Aviation Brigade (4CAB) held a training exercise that took place at Fort Carson and PCMS in March of 2020. This large-scale training exercise was held at Fort Carson with only a Forward Area Refueling Point (FARP) established at PCMS. There were no historic properties within the area in which the FARP was established. All ground activity at PCMS was limited to the FARP and the existing MSRs to reach the FARP. No historic properties were located within the area of potential effects of the FARP.

### *D. Inadvertent Entries and/or Impacts to Historic Properties*

During the reporting period, inadvertent entries and/or impacts to historic properties were documented at

- CF2020-001 Inadvertent Entry – 5LA3429 / CF2020-009 Re-Assessment of Site 5LA3429: On October 1, 2019, PCMS Fire Department staff reported to the PCMS Archaeologist that they had driven along the southern boundary of PCMS during a routine fire monitoring operation. The PCMS Archaeologist inspected this area on October 2, 2019, and documented an entry at site 5LA3429. The vehicle left matted vegetation to light impressions (less than 2 cm in depth). The entry did not affect the integrity of the site.

After a thorough review of all associated site document, the CRM decided to re-assess the site's eligibility for inclusion in the National Register of Historic Places (NRHP). The PCMS Archaeologist conducted the re-assessment on October 2 and 5, 2020. There are no features at the site, and there has been little to no artifact regeneration at the site in the past 36 years. Combined with the results of the trowel tests and the heavily deflated landform on which the site rests, the site does not have the potential for intact subsurface cultural deposits. All research potential has been exhausted. The CRM has determined the site is ineligible for inclusion in the NRHP.

A Memorandum for Record (MFR) and supporting documentation were submitted to the SHPO, Native American Tribes, and other consulting and interested parties on October 16, 2020. The SHPO concurred with the determination of eligibility and finding of effect via correspondence dated October 23, 2020 (HC #65747). The Cultural Resources Permit Officer from the Fort Peck Assiniboine & Sioux Tribes and the CRM discussed the site re-assessment via telephone on October 23 and 26, 2020. The 30-day consultation period ends November 17, 2020.

- CF2020-002 Inadvertent Entry – 5LA3454: During a routine inspection on December 9, 2019, a Conservation Law Enforcement Officer identified a potential entry into site 5LA3454. He informed the PCMS Archaeologist on December 10, 2019. The SHPO was notified via email on December 11, 2019. Multiple sets of tracks, belonging to a single narrow-based, wheeled vehicle, such as a light pickup truck or all-terrain vehicle, entered the southwestern boundary of the site. The entry resulted in matted vegetation to light impressions (less than 2 cm in depth).



Feature 7, a heavily deflated hearth, was noted on the site map near the location of the tracks. No cultural features nor materials were observed in the tracks. The CRM determined the entry did not adversely affect the site. A MFR and supporting documentation were submitted to the SHPO, Native American Tribes, and other consulting and interested parties on September 22, 2020. The SHPO concurred with the finding of no adverse effects to a historic property via correspondence dated September 24, 2020 (HC #65747). Responses were also received from the Northern Arapaho Tribe, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma. The Northern Cheyenne Tribe and Pawnee Nation of Oklahoma agreed with the finding of effect. The Northern Arapaho Tribe has requested a site visit, which is tentatively scheduled for mid-November.

- CF2020-006 74.5 Wildland Fire After Action Report – Protected Cultural Resources: On May 21, 2020, Sol Solutions, LLC, archaeologists conducted an after action inspections of all protected cultural resources within the area of potential effects (APE) of the 74.5 Wildland Fire, which was caused by lightning. The SHPO was notified via email on June 18, 2020. Three protected resources were located within the APE: 5LA3322, 5LA3476, and 5LA3477. No signs of wildland fire or associated fire suppression activities were observed within the boundaries of 5LA3476.

The wildland fire affected the northern portion of site 5LA3322. During initial attack, emergency vehicles entered the northern portion of the site on an east-west axis at the piñon-juniper woodland/shortgrass prairie nexus. This became an established point of attack, as well as mop-up activities, to keep the fire from spreading into the piñon-juniper woodland. Point-of-attack activities included spraying water and foam suppressant on the fire. Mop-up activities, which the CRM monitored, included putting out hotspots using water and scraping hot embers into the burned area with a hand rake. Another entry occurred in the eastern portion of the site on a north-south axis. Vehicles followed along tracks made during initial attack. Tracks are categorized as light impressions (less than 2 cm in depth). No cultural features nor materials were observed in the tracks. All features are located in the southern portion of the site within the piñon-juniper woodland. The site was not adversely affected by the wildland fire or associated fire suppression activities.

The wildland fire affected all but the eastern quarter of site 5LA3477. All features are located in within the burn footprint. One emergency vehicle entered the southeastern boundary of the site, then turned around and exited the site along its original path. The vehicle did not impact any known features. No cultural features nor materials were observed in the tracks. The site was not adversely affected by the wildland fire or associated fire suppression activities.

A MFR and supporting documentation were submitted to the SHPO, Native American Tribes, and other consulting and interested parties on October 8, 2020. A response was received from the Northern Arapaho Tribe agreeing with the finding of effect. The 30-day consultation period ends November 9, 2020.

- CF2020-008 Bent Canyon Wildland Fire After Action Inspection: The following known protected resources are within the APE of the wildland fire, which was caused by lightening, and associated fire suppression activities: 5LA4382, 5LA4383, 5LA4499, 5LA4642, 5LA4703, 5LA4706, 5LA4707, 5LA4711, 5LA4713, 5LA4718, 5LA4724, 5LA4950, 5LA9776, and 5LA9781. The SHPO was notified of potential impacts via email on June 18, 2020. The fieldwork portion of the inspections has been completed; site documentation and associated report preparation is ongoing. A portion of the Bent Canyon Wildland Fire APE has not been surveyed; therefore, a cultural resources inventory of 648 acres is being conducted within the APE. Survey fieldwork is ongoing. Once the survey is complete, a MFR and all supporting documentation will be submitted to the SHPO, Native American Tribes, and other consulting and interested parties.
- CF2020-014 ITAM Site Marking Project, PCMS: During an inspection of newly installed physical protection measures, the CRM and PCMS Archaeologist noted inadvertent entries associated with the site marking project at the following sites: 5LA4750, 5LA6108, and 5LA13436. An inspection of all sites that have been marked by the Contractor is ongoing. The SHPO was notified via email on May 14, 2020. Once the inspection is complete, a MFR and all supporting documentation will be submitted to the SHPO, Native American Tribes, and other consulting and interested parties.

#### *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 #2019-2930: The wildland fire started on November 19, 2019, with fire suppression activities concluding on the same day. Approximately 2 acres within Training Area (TA) E were impacted. There are no historic properties within the wildland fire footprint.
- Incident #2020-00091: The wildland fire started on January 14, 2020, with fire suppression activities concluding on the same day. Approximately 1 acre on Range 9 was impacted. There are no historic properties within the wildland fire footprint.
- Incident #2020-00106: The wildland fire started on January 15, 2020, with fire suppression activities concluding on the same day. Approximately 0.25 acres on Range 9 were impacted. There are no historic properties within the wildland fire footprint.

- Incident #2020-00612: The wildland fire started on February 26, 2020, with fire suppression activities concluding on the same day. Approximately 0.10 acres on Range 9 were impacted. There are no historic properties within the wildland fire footprint.
- Incident #2020-00766, 2020-00769, 2020-00770, 2020-00771, and 2020-00773: The wildland fire started on March 11, 2020, with fire suppression activities concluding on the same day. Approximately 9 acres on Range 7 were impacted. There are no historic properties within the wildland fire footprint.
- Incident #2020-01333 (74.5 Wildland Fire): The wildland fire started on May 16, 2020, with fire suppression activities concluding May 26, 2020. Approximately 2,174 acres were impacted. Three protected resources were within the fire footprint. Refer to Section III.D, CF2020-006 for more information.
- Incident #2020-01503 (Bent Canyon Wildland Fire): The wildland fire started on June 4, 2020, with fire suppression activities concluding on June 7, 2020. Approximately 898 acres were impacted. Fourteen protected resources were within the fire footprint. Refer to Section III.D, CF2020-008 for more information.

#### *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 management of cultural resources at PCMS. Enclosure 4 includes their correspondence and USAG Fort Carson's response.

#### *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, 2017 1SBCT "Raider Focus II" Training Exercise, and 2018 3<sup>rd</sup> Armored Brigade Combat Team (3ABCT) "Iron Strike" Training Exercise is ongoing. Mitigation plans are in development for 36 historic properties that have been adversely affected by these training exercises or that have had multiple entries since 2010 from military training. There has been no correspondence during the reporting period concerning these consultation efforts.

Report compiled by:

Jennifer R. Kolise  
Cultural Resources Manager



Approved by:

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Wayne Thomas  
Chief, NEPA and Cultural Management Branch

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Carlos Rivero-deAguilar  
Chief, Environmental Division

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Hal Alguire  
Director, Public Works

**ENCLOSURE 1:**  
**ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY19 REPORTING PERIOD (OCTOBER 1, 2019  
 THROUGH SEPTEMBER 30, 2020) 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
2020-003 Install Cable Ice Bridge between Radio Building and Antenna Tower, Federal Aviation Administration Tower Site	BAA19-005	PCMS Numbered TAs	PC B4a1	10/3/2019	
2020-023 10th Special Forces Group (SFG) Excavation Training Request, TA 2, Fort Carson	n/a	PCMS Numbered TAs	PC B3	10/17/2019	
2020-054, 2020-073, & 2020-309 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 PCMS Lettered TAs	FC D2b PC B4b2 PC C3B3	12/4/2019 12/20/2019	2020-054, 2020-073, 2020-309 are updated NEPA reviews. Several of the proposed locations were also reviewed as part of the FY18 & FY19 Prescribed Fire and Wildland Fuels Reduction Plan (NEPA Project No. 2018-001, 2018-004, 2018-119, 2018-205, 2018-333, & 2019-259).  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 Annual Report.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-056 ITAM Projects in TA 30, Fort Carson (Task 21-172), & TA 7, PCMS (Task 18-508)	DPT20-007	Downrange Fort Carson; PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	12/5/2019	<p>Task 21-172 is the rehabilitation of an existing elevated maneuver trail in TA 30 of Fort Carson. Proposed work includes bank sloping; adding water bars, and riprap; and repairing the road surface.</p> <p>Task 18-508 is the rehabilitation of Erosion Control Dam 2 in TA 7 of PCMS. Proposed work includes repairing the breach in the dam, installing a culvert, and removing trees along the dam. Both projects support safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events.</p> <p>Task 18-508 was previously reviewed under NEPA Project No. 2018-307</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
2020-063 & 2020-141 Building Improvements, Bldg. 300 & 301, PCMS	PCM16-001	PCMS Cantonment	PC A2b	12/16/2019 3/4/2020	<p>Proposed work for Bldg. 300 includes installation of two A-phone systems with a buzzer entry, cipher locks on doors, upgraded lighting around the building and perimeter, replacement of doors and windows, clean the HVAC system replacing filters and repairing ducts as needed, and construction of white cell wall in east wing bunkroom. Proposed work for Bldg. 301 includes the installation of two washers, two dryers, one extractor, and bunker gear dryer to include all utilities (electrical, vents, water lines, and drains).</p> <p>2020-063 is an updated NEPA review, as it has been over six months since last reviewed and project has not been initiated. 2020-141 is a change in project scope.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2016-386.</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
2020-066, 2020-254, & 2020-308 Quarterly Record of Environmental Consideration (REC) for Training	DPT20QTR2 DPT20QTR4 DPT21QTR1	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/12/2019 7/9/2020 9/24/2020	Per Fort Carson Regulation 200-1, each quarter the 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 aviation); excavation training, etc. It does not cover brigade training exercises, which are reviewed separately. In addition, excavation training is reviewed by the CRM on a case-by-case basis. Updated GIS layers of protected resource restrictions, as well as Standard Operating Procedures (SOPs) and cultural resources awareness training briefs for Fort Carson and PCMS are provided to the Directorate of Plans, Training, Mobilization, and Security (DPTMS) for planning purposes.
2020-069 Prairie Dog Control at Fort Carson and PCMS	DWP20-037	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	BE I.B3 FC D2b PC A3b PC B4b2	12/16/2019	Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; Ranges 11, 24, 29, 45, 104, 105, 109, 111, 115A, 115B, 117, 119, 139, 151, & 153 on Fort Carson; MOUT Site 11A at PCMS; and PCMS Airfield.
2020-097 4th Engineer (EN) Battalion (BN) Excavation Training Request, TA 7, PCMS	n/a	PCMS Numbered TAs	PC B3	1/22/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-124 Remove Towers, Fort Carson and PCMS	DPT16-016	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Training Area A	BE I.A3 FC D1d PC B4a4 PC D3a2	2/21/2020	<p>The proposed work includes dismantling six 50-foot and one 100-foot metal communication towers on Fort Carson and PCMS. The location of the towers on Fort Carson are: Bldg. 2135 (50-foot tower), Agony Hill (50-foot tower), and Range 155 (50-foot tower). The location of the towers on PCMS are: Dillingham (50-foot tower), Vouno (50-foot tower), Hogback (50-foot tower), and Cedar Hill (100-foot tower).</p> <p>2020-124 is an updated NEPA review, as it has been six months since previously reviewed and the project has not been initiated. In addition, there has been a change to the original project scope.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2016-290.</p>
2020-129 4th Combat Aviation Brigade (CAB) "Eagle Strike" Training Exercise, Fort Carson and PCMS	n/a	Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	FC A FC B FC C PC A1 PC B1 PC B2 PC B3	2/25/2020	<p>This training exercise was held at Fort Carson with only a Forward Area Refueling Point (FARP) established at PCMS. There were no historic properties within the area in which the FARP was established. All ground activity at PCMS was limited to the FARP and the existing MSRs to reach the FARP.</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
2020-144 FY2020 Invasive Species Control, Fort Carson and PCMS	DPW20-051	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	3/5/2020	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 has been provided to the proponent for avoidance of protected cultural resources.
2020-205 Furniture Moving Blanket Purchase Agreement	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs	BE I.A2 BE I.D2h BE I.D4 FC D1b PC A2b PC B4a2 PC C3a	5/4/2020	Proposed work includes moving furniture within or between buildings at Fort Carson and PCMS.
2020-214 Demolish Rail Yard Side Loading Ramp, PCMS	PCM19-001	PCMS Cantonment	PC A2d	5/14/2020	



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2020-243 Temporary Squad Live Fire Range, PCMS	n/a	PCMS Numbered TAs	PC B1 PC B2 PC B3 PC B4a3	6/10/2020	In support of a training exercise, Range Operations will establish a temporary squad live fire range. All targets will be placed on the ground with steel boxes set in front of the targets and sand bags in front of the boxes. The lanes will be positioned so all live fire is in the direction of the existing Small Arms Impact Area. There is no excavation associated with the creation of the temporary range. Excavation training may occur within the footprint.
2020-293 59 QM CO Excavation Training Request, TA 9, PCMS	n/a	PCMS Numbered TAs	PC B3	8/27/2020	

**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
2020-057 ITAM Projects, TA 10, PCMS (Tasks 18-511 & 18-512)	DPT20-008	PCMS Numbered TAs	12/5/2019	HC #77648 4/6/2020	<p>No historic properties affected.</p> <p>Responses were also received from the Northern Cheyenne Tribe, Pawnee Nation of Oklahoma, and Not 1 More Acre!.</p> <p>The Northern Cheyenne Tribe and Pawnee Nation of Oklahoma agreed with the finding of effect.</p> <p>N1MA! did not agree with the finding of effect. Follow-up consultation to address N1MA!'s concerns was conducted. Consultation concluded on 30 Sep 2020 after more than 30 days of no response to last correspondence.</p>

**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
2020-060 4th Infantry Division (4ID) Helicopter Landing Zone Booklet Review	n/a	n/a	12/4/2019	Document review
2020-224 Agreement between Fort Carson and Forest Service for Access to Picket Wire Canyonlands Access	n/a	PCMS Numbered TAs	5/26/2020	Renewal of access agreement allowing Comanche National Grasslands, U.S. Forest Service (USFS), staff to access to USFS property via PCMS using existing gates and roads. The agreement also allows USAG Fort Carson staff access to Army property via Comanche National Grasslands using existing gates and roads.
2020-299 Programmatic Environmental Assessment for the Fielding of Armored Multi-Purpose Vehicle (AMPV)	n/a	n/a	9/8/2020	This is a review of the preliminary draft Programmatic Environmental Assessment to analyze the environmental and socioeconomic impacts with the fielding of the new AMPV. Fort Carson is one of the installations proposed to receive the AMPV, which will replace the older M113 family of vehicles. If Fort Carson is chosen, the required construction and training needs associated with this new vehicle will be further analyzed.

**ENCLOSURE 2:  
PCMS PA TASK TRACKER  
(CURRENT AS OF SEPTEMBER 30, 2020)**

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).



Stipulation	Action	Duration	Date Required	Remarks
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: Contract awarded in September 2018 to develop research designs for 71 sites. Research designs for 32 sites are being reviewed by the CRM. Research designs for 39 sites were submitted for SHPO review. Comments are being addressed. Project is ongoing.</p> <p>FY20: Contract awarded in September 2019 to evaluate 58 isolated finds. Fieldwork is ongoing.</p> <p>FY20: Contract awarded in September 2019 to conduct a traditional use study of the Hogback. Site visits are on hold due to COVID-19 pandemic.</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) is ongoing.</p> <p><b>Protection strategies have been implemented at the “Needs Data Sites.”</b></p>
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	<p>Consultation meeting was held January 28-30, 2020, at PCMS. In attendance were representatives from the Cheyenne River Sioux Tribe, Eastern Shoshone Tribe, Jicarilla Apache Nation, Northern Arapaho Tribe, Pawnee Nation of Oklahoma, Southern Ute Indian Tribe, and Standing Rock Sioux.</p>

Stipulation	Action	Duration	Date Required	Remarks
III.A	Implement site protection measures		04/22/2017	<p>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 <b>(These numbers have not been updated since FY19 Annual and will be updated after the current site marking project has been completed to ensure accuracy.)</b></p> <p>FY19: The Integrated Training Area Management (ITAM) Program marked 33 eligible sites with Seibert markers and installed Carsonite markers at 7 sites.</p> <p>FY20: The ITAM Program has marked 62 eligible sites with Seibert markers and 32 sites with Carsonite markers. Work is in progress to install Seibert markers at 62 eligible sites. This will complete the marking for all eligible sites within the numbered training areas, and within lettered training areas that are located on the canyon rim.</p>
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	<p>Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections.</p> <p>FY20: Contract awarded in April 2020 to assist with monitoring activities.</p>
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 <sup>th</sup>	Consultation meeting was held on January 15, 2020, 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.  The 5-year update will be initiated in November 2020.

**ENCLOSURE 3:**  
**USAG FORT CARSON'S RESPONSE TO SHPO'S COMMENTS ON FY18 & FY19 ANNUAL**  
**REPORTS**





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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](mailto:lindsay.johansson@state.co.us), Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or [jason.obrien@state.co.us](mailto:jason.obrien@state.co.us), or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto:mark.tobias@state.co.us).

Sincerely,

fr 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.





**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 (SPE.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.





**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").



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

December 30, 2019

Mr. Steve Turner, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Mr. Turner:

Thank you for your correspondence dated November 29, 2018, concerning your review of the fiscal year (FY) 2018 annual reports for the three programmatic agreements. The intention of this letter is to provide you an update on our continuous efforts to train Soldiers and their chain of command on cultural resources and the need to protect them. We also would like to address your comments regarding documentation of cultural resources and mitigation for adverse effects.

With regard to our Cultural Awareness Training program, we sincerely appreciate your observations and understand your questions regarding its overall effectiveness given the statistics you used for your evaluation, however we do not agree with your overall conclusions. In fact, we feel that the training program has been quite effective in raising the awareness level of Fort Carson Soldiers and military leaders, and has contributed greatly to opening communication and establishing cooperative planning lines with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like Directorate of Plans, Training, Mobilization and Security (DPTMS) which are involved with us in planning and executing military training. This cooperative work, which did not exist a few years ago, has in our opinion greatly reduced the potential for and actual impacts to the resources considering the potential for adverse effects associated with military training and heavy use of the land. We also feel an obligation, in light of your comments, to explain the program better for you and your staff, and will try to describe better how the different types of military training, operational tempo, training objectives and scenarios, type of brigade (i.e., Aviation vs Armored vs Stryker etc.), weather, land area used, and other similar factors, can contribute to the number of inadvertent entries outcome. We understand how one could easily come to different conclusions on the overall effectiveness of our training program without having a good understanding of how these military training nuances can affect the effects outcome or the perception of the outcome. In the following paragraphs, we will do our best to explain these contributing factors and hopefully illustrate better the effectiveness of our training program and our vigorous efforts to protect cultural resources.



As an example, you suggest we amend and adjust our cultural awareness training program based on the quantitative data (i.e. the number of inadvertent entries reported for past brigade training exercises) at the Piñon Canyon Maneuver Site (PCMS). What the suggestion does not take into account with regard to our training program is how successful it has been and how few inadvertent entries actually have occurred at Fort Carson, despite the considerably higher operational tempo of maneuver training throughout the year. Further, we feel that focusing on one type of training (i.e., brigade) is not a reliable indicator of overall effectiveness of the cultural awareness training. Each brigade exercise is designed to meet specific training objectives; therefore, no two training scenarios are exactly alike, especially if comparing the Stryker brigade's exercise to the armored brigade's exercise to the infantry brigade's exercise to the combat aviation brigade's exercise. There are significant differences in the type and number of training assets utilized, and the amount of space required as they move across the landscape. For example, the training exercise by the 4<sup>th</sup> Combat Aviation Brigade (4CAB) conducted in 2018 at Fort Carson and PCMS resulted in no inadvertent entries. However, the 4CAB was not better educated in cultural resources awareness than the other brigades. Their training footprint on the ground was much smaller than other brigade exercises, since they are primarily doing air-to-ground force training and not ground-to-ground force training.

Also, as mentioned, other factors like weather play a significant role in the number of entries that could potentially occur during an exercise. For instance, during the 2013 exercise, which had the second lowest number of inadvertent entries reported, training had to be halted due to the adverse weather conditions. For several days, training assets were unable to move across the landscape due to the severe weather conditions.

Similarly, the size and area covered during the training event has a direct effect on the number of protected resources inadvertently entered. For example, after the 3<sup>rd</sup> Armored Brigade Combat Team's (3ABCT) exercise in 2018, a total of 355 protected cultural resources were inspected due to the expansive land area used. Previous exercises required site inspections in the range of 179 to 211. Each training exercise is unique for each unit and unit type, and different training scenarios require different amounts and variety of terrain. So it is difficult to use the number of sites entered as the only criteria for success or failure of the cultural awareness training program.

As pointed out above, what speaks to the success of the cultural resource awareness training in our opinion is how much the unit leaders and exercise planners are involving the Cultural Resources Program staff in preplanning activities in recent years. Our Cultural Resources Program is now involved in all battalion and brigade pre-exercise working group meetings. The Cultural Resources Manager provides, in addition to Environmental Protection Officer training, cultural resources briefs at the



Observer/Controller Team (O/CT) Academy which is held prior to the start of each brigade exercise. Further, the Program, in collaboration with DPTMS, produced a few years ago, a Cultural Awareness video, posted on the Fort Carson web site, which is used regularly to educate Soldiers, unit leaders and Command, in addition to required awareness training prior to major maneuver military training. Cultural Program staff these days are also able to ride-along with Range Inspectors during the exercise, something that did not happen a few years ago. Furthermore, thanks to our efforts, well-trained DPTMS Range Inspectors have been instrumental in moving units away from protected resources and other areas in which the unit is not supposed to be, and letting our Program staff know if protected resources have been entered. It is worth pointing out as well that during execution of past exercises, the Cultural Resources Manager and our PCMS archaeologist have observed units utilizing the resource protection map during pre-movement planning, as well as the O/CTs using the maps to verify that units are not training within restricted areas.

The Cultural Resources Program does regularly review its training materials and methods of dissemination to achieve maximum results. As you may or not be aware, we used community e-newsletters, social media, news print, Maneuver Damage Training, and standard annual training in addition to Environmental Protection Officer Training. We actively seek feedback on the training materials we produce. We would welcome any examples your office may have of other effective cultural resource awareness training used successfully elsewhere. We hope above illustrates our hard work and effectiveness of our awareness training program and the intrinsic difficulties associated with evaluating its success. We can assure you that we will continue our efforts and will do our best to identify additional ways to improve it.

With regard to other comments in your letter, as you know, with limited budgets, our cultural resource projects must be prioritized based on Army mission needs. In collaboration with the Directorate of Plans, Training, Mobilization, and Security, we have developed prioritization criteria for evaluating, mitigating, and marking of resources. Our project focus has been on the assessment of needs data archeological resources and protection of those determined to be historic properties. Additionally, we have been implementing our site monitoring/inspection program to best evaluate the site protection effectiveness. Active projects contracted in support of these priorities are research designs for the evaluation of 21 resources at Fort Carson and 71 resources at PCMS. In addition, 11 isolated finds at Fort Carson and 58 isolated finds at PCMS will be documented and evaluated to modern-day standards.

On another related matter, your letter suggests we have not prioritized mitigation projects associated with the Fort Carson Downrange PA. However, for us, these mitigation projects are one of our program's top priorities. The Mitigation Projects Advisory Committee was developed, and the first meeting was held in June 2015. The



scope of work for the first phase of the Archaeological Context Mitigation Project was drafted in coordination with the advisory committee, and the contract awarded in August 2016. The first phase of the project was completed in August 2018. USAG Fort Carson is coordinating with the Mitigation Projects Advisory Committee to determine other projects to complete for the second phase of the mitigation project. Similarly, USAG Fort Carson has been in consultation with the Tribes on the best use of mitigation funds for the Native American Ethnographic Oral History Project. Originally during the Annual Tribal Consultation meeting in January 2015, it was suggested to use these mitigation funds to develop Tribe-specific education videos. USAG Fort Carson pursued this idea, until it was learned through further discussions at the following annual meeting that it was no longer supported by the Tribes. As a result of ongoing consultation, it was decided to conduct a holistic traditional use study of the Hogback at PCMS. We have worked with the Tribes in the development of the project's scope of work, and the contract was awarded in September 2019.

The Bent's Fort Chapter of the National Santa Fe Trail Association briefed the Mitigation Projects Advisory Committee on an idea for the Santa Fe Trail Community Outreach Project. The committee requested a more formal proposal from the organization to include proposed budget and deliverables. After several attempts to engage the designated representative from the Bent's Fort Chapter, the formal proposal has not been provided.

USAG Fort Carson is consulting with the Tribes on the re-assessment of the Turkey Creek Rock Art Historic District (5PE14). Two site visits have been conducted. Another visit was scheduled for October 2019, but had to be canceled due to lack of Tribal participation. As this district is a property of traditional, religious, and cultural importance, we will continue our collaboration with the Tribes to develop criteria for how the district will be defined and managed in the future.

All signatories associated with the Fort Carson and PCMS training programmatic agreements have acknowledged that training activities across the landscape could have the potential to result in adverse effects to historic properties. You and the Advisory Council on Historic Preservation agreed military training is exempted from further Section 106 consultation with the stipulation that training is not authorized to occur within protected resources. There are also stipulations to conduct inspections of protected resources to determine if these sites are being impacted from training activities. The agreements further stipulate that if adverse effects are noted, then USAG Fort Carson would initiate consultation to resolve for those effects in accordance with 36 CFR 800.6. We have determined sites have been adversely affected due to past military training activities. With the information we have gleaned from our investigations and discussions with the training community, the USAG Fort Carson is working to develop a mitigation strategy. We are currently drafting mitigation plans for

36 sites at PCMS that will help to inform our decision on the best strategy to employ. We plan to initiate discussions with your staff in the near future to develop and execute memorandums of agreement to resolve for some of the acknowledged adverse effects from past training.

To address the comments from your enclosures see the attached enclosures 1, 2, and 3.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Carlos Rivero-deAguilar', with a horizontal line drawn underneath it.

Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures



**Enclosure 1:**  
**USAG Fort Carson's Response to 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.*

USAG Fort Carson did not feel a response to the Colorado Council of Professional Archaeologists was required, as they agreed with the finding of effect as long as 1) the color of the silicone sealant used on Building 10015's roof was consistent with the original color of the roof, and 2) the visual impacts from leaving the concrete footing associated with the grain silo would be minimized.

The Section 106 undertaking review documentation provided the product specifications, to include the color to be used, and photographs of the existing roof color and condition. As seen in the photographs provided, the roof is currently painted white; the sealant color is also white.

In reference to the grain silo footings being seen after the silo removal, the Section 106 photographs provided show that the footing are flush with the ground surface. Therefore, there would be no visual impacts from leaving the footings in situ.

**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.*

Thank you for your comment.

H.

*No comments.*



**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2018 Fort Carson  
Downrange 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.*

Thank you for your comment.

**III. Action Updates**

**A. Status of Task 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 (5PE14) 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 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.*

Thank you for your comment. USAG Fort Carson is collaborating with culturally affiliated Native American Tribes in the development of criteria for the definition and management of the Turkey Creek Rock Art Historic District. Once these criteria have been developed, we will continue consultation with your office on the district boundaries and its contributing and non-contributing sites.

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

In correspondence dated February 26, 2018, and March 7, 2018 (HC #63877), you did not concur with the determination of eligibility for sites 5EP6171, Lytle Ditch, and 5EP6641.1, an isolated T-shaped concrete structure thought to be a culvert to channel water from the small channel on the southwest side of the culvert into the main channel of Turkey Creek on the northeast side in southeastern corner of Turkey Creek Complex. We are currently drafting an irrigation network context study that will address many of



your questions. These sites continue to be treated as protected resources until this matter can be resolved.

*III.E: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to 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.*

The stipulation 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..." USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems, but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

#### 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.*

This comment has been addressed in the body of the letter.

#### 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.*

This is not a good example of "the disconnect between individuals at various command levels." The portable latrines were placed there by a private contractor, not the military unit conducting the exercise. The Contracting Officer's Representative contacted the contractor to resolve the issue once noticed by our Conservation Law Enforcement staff. This event provided us an opportunity to place additional safe guards for contractor delivered latrines in the future.

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.*

The After Action Report has been mailed to your office in mid-December 2019.

F. Amendment

*See comment III.A.I.C above.*

We do not understand how your comment on III.A.I.C above relates to proposed amendments to the Fort Carson Downrange PA.

G. Dispute Resolution

*No comments.*



**Enclosure 3:**  
**USAG Fort Carson's Response to 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 resources 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.*

Thank you for your comment. As part of the Section 106 undertaking review process, the Cultural Resources Manager (CRM) does assess the need for surveying the area of potential effects (APEs). Depending on the location and type of the proposed undertaking, the CRM may decide to re-survey an area or have an archaeological monitor on site. The implementing regulations for Section 106 of the National Historic Preservation Act calls for a "reasonable and good faith effort" to identify historic properties (not cultural resources) within an undertaking's APE. The CRM reviewed all available data, and given the project location and the potential for historic properties, determined re-survey of these APEs are not warranted. Based on geoarchaeological investigations, there is low potential for intact cultural materials in arroyo affected by cutting, unless it is a very recent cutting event (less than 500 years ago), then there may be moderate potential for cultural materials (Andresky 1990; Schuldenrein 1985). If a historic property should exist within these areas, it would most likely be buried; as such, traditional survey methods would not identify these properties. Therefore, the PCMS Archaeologist will monitor this project, which is a CRMP best management practice for these types of projects. The USAG Fort Carson also has a standard operating procedure for the inadvertent discovery of cultural materials, which is provided to project proponents for dissemination.



### III. Action Updates

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

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles, on the Hogback, and along or in canyon areas that are designated for dismounted maneuver. We acknowledge that vehicle entries do inadvertently occur to some of these "Need Data" sites, but resources are being directed to place a higher level of protection to known historic properties. In addition, the SHPO concurred with our protection management strategy for needs data sites as listed in Appendix 2 of the PCMS PA when the amendment was signed in April 2018.

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. Physical protection measures will never be foolproof. Even sites that have boulders, in addition to the Seibert markers or fencing, have been entered. These measures are just one of the levels of protection measures in place. The Seibert markers have worked well as a deterrent. We have seen many cases where vehicles have driven up to the site, then turned around when they came upon the markers. And even with some of the reported entries, the vehicle entered and then immediately backed out or turned around and exited the site when the Seibert markers were observed. Although not perfect this is why there is a provision in the 36 Code of Federal Regulations Part 800 to address resolution of adverse effects.

*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.*

The stipulation 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..." USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems (GPS), but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

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.*

This comment has been addressed in the body of the letter.

C. Brigade Training Exercises

*We suggest that all training exercises have the potential to adversely affect historic properties 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.*

This comment has been addressed in the body of the letter.

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.*

Thank you for your comment.

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

"None (Administrative)" is defined as resources requiring administrative protection measures, as defined in the PCMS PA, that do not have any physical markers in place.

"None (Nominal)" is defined as resources requiring nominal protection measures, as defined in the PCMS PA, that do not have any physical markers in place. Due to high potential for looting, these sites are not marked.

"None (Standard)" is defined as resources requiring standard protection measures, as defined in the PCMS PA, that do not have any physical markers in place. None of the protected resources should have been listed as such in Appendix 2, but there were seven sites that were listed as "None (Standard):" 5LA3269, 5LA3300, 5LA3387, 5LA4399, 5LA5698, 5LA6108, and 5LA7443. A review of our Geographic Information Systems (GIS) data and site documentation shows the table was in error. At the time of the drafting of the FY18 Annual Report: sites

- 5LA3269, 5LA3300, and 5LA5698 should have been categorized as Seibert Markers – Corners only (Standard). These have since been fully marked with Seibert markers.
- 5LA3387 should have been categorized as Seibert Markers, Protection Fence, & Terrain (Standard), as it is located within a large area containing several sites that are surrounded by a combination of fencing and Seibert markers.
- 5LA4399 and 5LA7443 should have been categorized as Seibert Markers – Corners only & Terrain (Standard). The Integrated Training Area Management (ITAM) Program has awarded a contract to complete the marking of these sites.

- 5LA6108 seems to be the only site that lacks any physical protection measures. It will be marked as part of the ITAM site marking project this year

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").*

Thank you for your comment.



Wayne



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

JAN 15 2020

Re: Fiscal Year (FY) 2019 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear M. Rivero-deAguilar:

Thank you for your emailed correspondence dated 15 November 2019 and received by our office electronically the same day regarding review of the Fiscal Year 2019 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.

Similar to our comments on the FY2018 annual report, our first 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.

Again, we also 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 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. Training cannot be only from the "bottom up" or "top down," but should incorporate varying pedagogies, methods, and should be targeted at varying groups.

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](mailto:lindsay.johansson@state.co.us), Jason O'Brien, Section 106 Compliance Manager, at (303) 866-2673 or [jason.obrien@state.co.us](mailto:jason.obrien@state.co.us), or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or [mark.tobias@state.co.us](mailto: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**

**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 PA. We anticipate working closely together during Fiscal Year 2020 on additional portions of the agreement.

**H.**

No comments.

**Attachment 2:**  
**SHPO Comments on FY2019 Down Range Fort Carson PA Annual Report (HC#63877)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

2019-134, 163: Our office looks forward to consultation on these undertakings.

2019-321: We request to be involved in resolution of the concerns expressed by consulting parties.

**III. Action Updates**

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

I.C: As detailed in Enclosure 2, we have not provided concurrence on eligibility for several sites. Additionally, other sites are categorized as needs data. We feel that several issues are contributing to the situation.

One issue is the fact that USAG Fort Carson has not yet documented and reevaluated the Turkey Creek Rock Art District. As discussed during the August 16-18, 2017 Turkey Creek Rock Art District Tribal Consultation Meeting, U.S. Army Garrison (USAG) Fort Carson is working to proactively improve its management of the Turkey Creek Rock Art District (TCRAD). One method is to evaluate the existing district and create an amendment to the district nomination documentation to reflect current surveys and Tribal consultation. Loendorf et al. (2017:9.3) puts forward three of the many options available. Our office views TCRAD Approach 2 as the preferred option. This solution was previously put forward by Zier et al. (1997), and we see this as the option which is the most in keeping with the intentions of the preservationists who originally nominated the "Indian Petroglyphs and Pictographs/Turkey Creek Canyon" district for listing in the National Register in 1976. TCRAD Approach 2 would allow for a geographically unified district that represents not only a landscape feature (the drainage) but would also include all sites associated with prehistoric use of that feature, rather than isolating rock art from other human uses of the landscape with which the rock art may be associated. In order to properly evaluate many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district. We request that renewed effort be placed on this during FY2020.

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, particularly when "administrative protections" are the only methods being used.

VI.B: Please include timetables and anticipated for completion of offsetting mitigation efforts.

**B. Cultural Resource Awareness Training**





We appreciate USAG Fort Carson's willingness to address our 29 November 2018 requests for an assessment of the effectiveness of the training program. We also appreciate USAG Fort Carson's 30 December 2019 letter that provided additional information concerning the current training activities. To reiterate, while we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.

Again, 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 appreciate USAG Fort Carson's efforts to document inadvertent entries, but feel that the continuing incidents further reinforces our position that the current method(s) of education are only minimally effective. Additionally, while each individual entry may not result in an adverse effect, we maintain our position that cumulatively, these incidents are proof that military use of these landscapes are an adverse effect to historic properties.

#### D. Inadvertent Discoveries

No comments.

#### E. Emergency Response

No comments.

#### F. Amendment

No comments.

#### G. Dispute Resolution

No comments.

**Attachment 3:**  
**SHPO Comments on FY2019 PCMS PA Annual Report (HC#65747)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

No comments.

**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 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**

As stated above, 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.

D. Inadvertent Entries and/or Impacts to Historic Properties

See comment C above. We look forward to continued consultation to resolve the effects of previous training exercises.

E. Inadvertent Discoveries

No comments.

F. Emergency Response

No comments.

G. Amendment

No comments.

H. Other

No comments.





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

October 30, 2020

Mr. Steve Turner, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Mr. Turner:

Thank you for your correspondence dated January 15, 2020, concerning your review of the fiscal year (FY) 2019 annual reports for the three programmatic agreements. The intention of this letter is to address your comments on mitigation efforts to resolve for adverse effects related to military use of Fort Carson and Piñon Canyon Maneuver Site (PCMS) and our cultural resources awareness training program.

The Advisory Council on Historic Preservation, Colorado State Historic Preservation Officer, and U.S. Army Garrison (USAG) Fort Carson acknowledged military use of Fort Carson and PCMS does have the potential to result in direct, indirect, and cumulative adverse effects to historic properties. All signatories to the programmatic agreements agreed military training is exempted from further Section 106 consultation with the stipulation that training is not authorized to occur within protected resources at both Fort Carson and PCMS, and is not authorized to occur within unsurveyed areas at PCMS, with the exception of foot traffic. There are also stipulations to conduct inspections of protected resources to determine if these sites are being impacted from training activities at Fort Carson and PCMS, as well as the stipulation to conduct after action inspections of protected resources after all brigade exercises at PCMS. This very robust monitoring provides transparent and real-time feedback to our partners on how effective our protection measures are working. The agreements further stipulate that if adverse effects are noted, then USAG Fort Carson would initiate consultation to resolve for those effects in accordance with 36 CFR 800.6.

*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 Down Range Fort Carson (Fort Carson Downrange PA) does include mitigation measures to resolve for adverse effects at 22 cultural resources and unrecorded historic properties that may exist within areas exempted from cultural resources survey. These mitigations were included in the programmatic agreement because U.S. Army Garrison (USAG) Fort Carson recognized the potential direct, indirect, and cumulative adverse effects to historic properties from military use of downrange Fort Carson. It is also one of the reasons why the Fort Carson Downrange PA includes a stipulation to routinely inspect*

and monitor protected resources and inform your office of any inadvertent entries or other impacts.

Since the implementation of the Fort Carson Downrange PA in 2014, eight sites have been entered as a result of military training: 5EP161, 5EP117, 5EP2524, 5EP5974, 5EP7602, 5EP8157, 5PE793, and 5PE2966. One of these eight (5EP161) was impacted by Contractors who placed portable latrines within the perimeter of the site in support of a military training exercise, and not by Soldiers training. Site 5PE2966 has been entered three times since 2017; as a result, USAG Fort Carson determined cumulative adverse effects due to military training were occurring at this historic property. You concurred with our finding of effects via correspondence dated June 1, 2020 (HC #77880). We also determined cumulative adverse effects due to erosion and military training were occurring at 5PE8157 with which you concurred via correspondence dated September 30, 2020 (HC #63877). The Fort Carson Cultural Resources Manager is working with your office to develop appropriate mitigations to resolve for adverse effects at these two sites.

Based on the few sites that have been entered since 2014 and the amount of military training that occurs downrange on a daily basis, we do not agree with your suggestion to initiate additional consultation to mitigate the direct, indirect, and cumulative adverse effects related to military use of downrange Fort Carson on a broad scale. Instead, USAG Fort Carson will continue to consult on a case-by-case basis when inadvertent entries or other impacts occur, and if we find that adverse effects are occurring or have occurred at the historic property, we will initiate consultation at that time to resolve for those adverse effects.

We do agree an overarching approach to mitigation is the best course of action to resolve for potential direct, indirect, and cumulative adverse effects resulting from military use of the PCMS. This is the approach we are pursuing as we continue consultation to resolve for adverse effects to historic properties from past brigade exercises. USAG Fort Carson has been working on developing mitigation plans for 36 historic properties at PCMS that have been adversely affected or have been entered during multiple exercises, as discussed at the Annual Programmatic Agreement Meeting with your office and consulting and/or interested parties. These mitigation plans will help inform our decision on the best strategy to employ and be ready to discuss various types of mitigation with your office, Native American Tribes, and other consulting and/or interested parties as we continue consultation to resolve for adverse effects.

In our December 30, 2019, letter we discussed at length why one cannot use quantitative data based on the number of inadvertent entries that occurred during brigade exercises to assess the effectiveness of our cultural resources awareness training program. What speaks to the success of the cultural resource awareness training in our opinion is the open communication and the establishment of cooperative planning lines with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like the Directorate of Plans, Training, Mobilization and Security,

that are involved in planning and executing military training. These entities regularly engage Cultural Resources Program staff in preplanning activities, such as battalion and brigade pre-exercise working group meetings. The majority of the individuals involved in these meetings are lieutenants, captains, majors, and lieutenant colonels. This collaboration has in our opinion greatly reduced the potential for and actual impacts to the resources associated with military training and heavy use of the land.

The Cultural Resources Program does regularly review its training materials and methods of dissemination to achieve maximum results. As stated in our December 30, 2019, letter, we would welcome any examples your office may have of other effective cultural resource awareness training used successfully elsewhere. We can assure you that we will continue our efforts and will do our best to identify additional ways to improve it.

The Department of Army has developed an organization (Training and Doctrine Command Culture Center), which is responsible for developing and delivering appropriate cultural resources awareness training to all Army leaders, this includes field grade and general officers. This training is provided at various times in each Soldier's career through formal education and assignment specific training.

To address the comments from your enclosures see the attached enclosures 1, 2, and 3.

Point of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,

RIVERO-  
DEAGUILAR.CAR  
LOS.1256627236



Digitally signed by RIVERO-  
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Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures



**Enclosure 1:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 Fort Carson Built Environment PA Annual Report (HC #58731)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*No comments*

**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 PA. We anticipate working closely together during Fiscal Year 2020 on additional portions of the agreement.*

Thank you for your comment.

H.

*No comments.*

**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 Fort Carson**  
**Downrange PA Annual Report (HC #63877)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*2019-134, 163: Our office looks forward to consultation on these undertakings.*

Section 106 consultation has not been initiated for 2019-134.

Section 106 consultation is ongoing for 2019-163 Installation of Three-Phase Electrical to Range 123. Via correspondence dated July 1, 2020 (HC #75708), your office requested an inventory for historic properties to completed on the portion of area of potential effects that lies outside of the jurisdictional boundary of Fort Carson. Your office was provided an opportunity to review and comment on the research design for the cultural resources survey. Fieldwork has been completed, and the Fort Carson Cultural Resources Manager is waiting for the draft site documentation and associated technical report of investigations to be submitted by Alpine Archaeology for review and comment.

*2019-321: We request to be involved in resolution of the concerns by consulting parties.*

Your office was involved in the resolution of the concerns by consulting parties. Additional Section 106 consultation was completed for the revised area of potential effects in March of 2020.

**III. Action Updates**

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

*I.C: As detailed in Enclosure 2, we have not provided concurrence on eligibility for several sites. Additionally, other sites are categorized as needs data. We feel that several issues are contributing to the situation.*

*On issue is the fact that USAG Fort Carson has not yet documented and reevaluated the Turkey Creek Rock Art District. As discussed during the August 16-18, 2017 Turkey Creek Rock Art District Tribal Consultation Meeting, U.S. Army Garrison (USAG) Fort Carson is working to proactively improve its management of the Turkey Creek Rock Art District (TCRAD). One method is to evaluate the existing district and create an amendment to the district nomination documentation to reflect current surveys and Tribal consultation. Loendorf et al. (2017:9.3) puts forward three of the many options available. Our office views TCRAD Approach 2 as the preferred option. This solution*



*was previously put forward by Zier et al. (1997), and we see this as the option which is most in keeping with the intentions of the preservationists who originally nominated the “Indian Petroglyphs and Pictographs/Turkey Creek Canyon” district for listing in the National Register in 1976. TCRAD Approach 2 would allow for a geographically unified district that represents not only a landscape feature (the drainage) but would also include all sites associated with prehistoric use of that feature, rather than isolating rock art from other human uses of the landscape with which the rock art may be associated. In order to properly evaluate many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district. We request that renewed effort be placed on this during FY2020.*

Thank you for your comment. USAG Fort Carson is collaborating with culturally affiliated Native American Tribes in the development of criteria for the definition and management of the Turkey Creek Rock Art Historic District. Once these criteria have been developed, we will continue consultation with your office on the district boundaries and its contributing and non-contributing sites. Due to travel restrictions associated with COVID-19, a site visit to view and discuss other portions of the Turkey Creek drainage did not occur this year. USAG Fort Carson believes it would be best to conduct a traditional use study of the Turkey Creek drainage, similar to the study being conducted for the Hogback at Piñon Canyon Maneuver Site, and we will be requesting funds for this project in the future.

*III.E: This stipulation should not be considered completed. Equipment failure, user ability to toggle on/off, improper maps uploaded to 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, particularly when “administrative protections” are the only methods being used.*

The stipulation 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...” USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems, but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. USAG Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

## **B. Cultural Resource Awareness Training**

*We appreciate USAG Fort Carson’s willingness to address our 29 November 2018 request for an assessment of the effectiveness of the training program. We also appreciate USAG Fort Carson’s 30 December 2019 letter that provided additional information concerning the current training activities. To reiterate, while we view the*

*current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.*

*Again, 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.*

This comment has been addressed in the body of the letter.

C. Inadvertent Entries and/or Impacts to Historic Properties

*We appreciate USAG Fort Carson's efforts to document inadvertent entries, but feel that the continuing incidents further reinforces our position that the current method(s) of education are only minimally effective. Additionally, while each individual entry may not result in an adverse effect, we maintain our position that cumulatively, these incidents are proof that military use of these landscapes are an adverse effect to historic properties.*

This comment has been addressed in the body of the letter.

D. Inadvertent Discoveries

*No comments.*

E. Emergency Response

*No comments.*

F. Amendment

*No comments.*

G. Dispute Resolution

*No comments.*

**Enclosure 3:**  
**USAG Fort Carson's Response to SHPO Comments on FY2019 PCMS PA Annual Report (HC #65747)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*No comments.*

**III. Action Updates**

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

*I.B: We suggest that administrative protections, such as those provided to the 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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles, on the Hogback, and along or in canyon areas that are designated for dismounted maneuver. We acknowledge that vehicle entries do inadvertently occur to some of these "Need Data" sites, but resources are being directed to place a higher level of protection to known historic properties. In addition, the SHPO concurred with our protection management strategy for needs data sites as listed in Appendix 2 of the PCMS PA when the amendment was signed in April 2018.

*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.*

Thank you for your comment. USAG Fort Carson respectfully disagrees. Physical protection measures will never be foolproof. Even sites that have boulders, in addition to the Seibert markers or fencing, have been entered. These measures are just one of the levels of protection measures in place. The Seibert markers have worked well as a deterrent. We have seen many cases where vehicles have driven up to the site, then turned around when they came upon the markers. And even with some of the reported entries, the vehicle entered and then immediately backed out or turned around and



exited the site when the Seibert markers were observed. Although not perfect, this is why there is a provision in the 36 Code of Federal Regulations Part 800 to address resolution of adverse effects.

*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 no 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.*

The stipulation 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...” USAG Fort Carson has made available to the 4<sup>th</sup> Infantry Division and other military units not only a digital map for vehicles with Global Positioning Systems (GPS), but also analog map capabilities (paper maps) for use by leaders, planners and vehicle commanders with and without these systems. Not all tactical vehicles have GPS equipment nor is it always operational. USAG Fort Carson has worked to standardize the map and symbols being used on the map and believes that acceptable progress has been made over the past year meeting this stipulation.

#### B. Cultural Resource Awareness Training

*As stated above, 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 ranking soldiers, these measures may be more effective.*

This comment has been addressed in the body of the letter.

#### C. Brigade Training Exercises

*We suggest that all training exercises have the potential to adversely affect historic properties 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*

This comment has been addressed in the body of the letter.

#### 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 previous training exercises.*

Thank you for your comment.

E. Inadvertent Discoveries

*No comments.*

F. Emergency Response

*No comments.*

G. Amendment

*No comments.*

H. Other

*No comments.*

**ENCLOSURE 4:**  
**NOT 1 MORE ACRE! CORRESPONDENCE ON FY19 ANNUAL REPORT**



December 17, 2019

**VIA EMAIL ([jennifer.r.kolise.civ@mail.mil](mailto:jennifer.r.kolise.civ@mail.mil))**

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

**Re: Comments on PCMS FY 2019 Annual Cultural Resources Report**

Dear Ms. Kolise:

On behalf of Not 1 More Acre!, (N1MA!), these comments are submitted on Army's Fiscal Year 2019 Annual Report required by the 2014 Programmatic Agreement (2014 PA) pertaining to cultural resources at Piñon Canyon Maneuver Site (PCMS), Colorado.

More than anything, Army's 2019 Annual Report indicates a significant lack of progress over the last year on cultural resources issues, including a failure to address valid concerns raised by N1MA! and the Colorado State Historic Preservation Office (SHPO), and a failure to adequately address violations of the National Historic Preservation Act (NHPA) and the 2014 PA—to the bizarre point where SHPO is now suggesting that Army should consider giving up on protecting some otherwise protected historic properties, effectively allowing Army to destroy them in order to save money and enlarge its “training box” at PCMS (pp. 54-55).

N1MA! adamantly opposes such incongruous distortion which would effectively turn NHPA's mandate for protection of cultural resources properties on its head, turning the statute into an instrument, by contrast, for destroying protected properties.

The fact that Army fails to take concrete steps to address the systematic violations of NHPA, the National Environmental Policy Act (NEPA), the Sikes Act, and the Freedom of Information Act (FOIA), year after year, despite notice of their violations, indicates without doubt that Army is intentionally and systematically avoiding and undermining these crucially important statutes, operating secretly, without transparency or validity, while conjuring false promises of “no significant impact,” “successful” mitigation,” and claims of compliance with applicable laws.

The solution to Army's serial failure to protect cultural resource properties at PCMS begins not with giving up and just letting Army enlarge its “training box,” but rather with recognizing that certain avoidance strategies have completely failed and necessitate devising meaningful alternatives and doubling down on concrete new steps Army must take to ensure cultural resources on PCMS are meaningfully protected.

The “sacrifice” of some properties eligible for listing on the National Register of Historic Places has not and will not “save” others, but does have the effect of leading to even more losses. Further, it converts to a cruel fraud Army's earlier public promises that there would be “negligible” impacts to cultural resources from training exercises at PCMS.

Army should be held to deliver on its promises through whatever means are necessary.

### **Stipulations I.B, III.A: Protection of ‘Needs Data’ Sites**

Stipulation I.B requires Army to complete documentation of “needs data” sites within three years of signing the 2014 PA. That deadline was three years ago. Last year, 555 “needs data” sites were listed by Army. This year, there are 567 listed (Encl. 2, p. 15).

Documenting these sites is necessary to ensure they are not destroyed before their historic value is even determined. Protecting these sites is required by Stipulation III.A of the 2014 PA. More than 800 supposedly “protected” sites are currently not protected (Encl. 2, p. 17). The Annual Report shows no meaningful progress, just tiny steps that amount to actual backsliding, years after the deadline Army agreed to meet.

The Annual Report’s claim that tasks necessary to satisfy Stipulation I.B. are “complete” is completely false. Army continues to maintain, baselessly, that no further surveys are required under the National Historic Preservation Act and 2014 Programmatic Agreement.

### **Stipulation III.D: Global Positioning System Protection**

Stipulation III.D of the 2014 PA requires Army to provide aviation assets and military vehicles with global positioning system information concerning protected properties within one year of the 2014 PA, or by 2015, and to “implement” these protections. Years later, however, including as recently as the 2018 brigade exercise, this task was not implemented.

On numerous occasions, Army has reported that the appropriate GPS data was not uploaded to the systems used by military vehicles or was intentionally turned off for simulated “opposing forces.” Army’s claim that this task has been “completed” is completely false and no efforts at correcting these failures are reported. Instead, Army makes the farcical claim that all it has to do is provide the troops with the GPS data, but need not do anything to make sure it is used (p. 44).

### **Stipulation VI.A: Failing to Consider Cumulative Effects**

Stipulation VI.A of the 2014 PA requires Army to include in its annual report an “[a]cknowledgment of, and mitigation strategies for, cumulative effects not previously identified.” N1MA! pointed out that this acknowledgment and discussion was totally omitted in Army’s 2017 and 2018 Annual Reports.

This year’s report contains the same omission, despite detailed information from the 2018 brigade after action report that numerous sites have been repeatedly and wrongfully entered during training exercises by Army military vehicles including tanks.

### **Stipulation II.B, III.C: Operating Training Vehicles Within Protected Properties**

Under Stipulations II.B and III.C of the 2014 PA, Army agreed to prohibit use of military vehicles within the perimeter of protected properties.

After many violations of these provisions by Army (totaling 153 admitted violations) many remain outstanding and unresolved this year as last year—stemming from the 2010 Warhorse Rampage training exercise, the 2013 Warhorse Charge training exercise, the 2015 Raider Focus I training exercise, the 2017 Raider Focus II training exercise, and the 2018 Iron Strike training exercise.

Absurdly, Army denies that entering a protected property with tanks, other military vehicles, and aviation assets during training operations is a violation of the 2014 PA and the NHPA.

The 2014 PA, however, agreed to by Army, clearly states that entries of this type are “not permitted,” II.B. Further, the legal effect of a violation of a programmatic agreement is that it is also a violation of NHPA. 36 C.F.R. §800.14(a)(4).

Army remains in violation of the 2014 Programmatic Agreement, as deficient as it is, and the National Historic Preservation Act, as it has been continuously for years.

### **Stipulation III.A: Protection of Cultural Properties**

Stipulation III.A requires Army to provide protection measures for all historic properties at PCMS. On Nov. 29, 2018, Colorado SHPO wrote to Army that the use of so-called “administrative protections” and “Seibert stakes” had been shown to be not protective of these properties (p. 22).

More than one year later, Army has done nothing, and is merely rousing itself to draft a responsive letter (p. 2). The Annual Report still relies upon so-called administrative protections and Seibert stakes in support of Army’s weak claims of compliance with the 2014 PA and the NHPA (p. 16).

### **Cultural Resources Training Inadequate**

Stipulation V.A requires Army to conduct cultural resources awareness training “for all personnel involved in the execution of undertakings with the APE (Area of Potential Effects) on an annual basis.” On Nov. 29, 2018, SHPO commented that annual training should be extended from just specially designated “environmental protection officers” to “all command positions” in light of the fact that violations are increasing despite current training efforts (pp. 28-29).

More than one year later, Army has done nothing and is merely rousing itself to draft a responsive letter (p. 2).

### **Continued and Increasing NEPA Violations**

The list of Exempted Undertakings in Enclosure 1 reveals to the public for the first time a series of major federal actions that occurred on PCMS that were never disclosed to the public or properly analyzed for environmental effects under NEPA, particularly site-specific effects.

These include prescribed fire burns; training use of established ranges, drop zones, and other facilities; excavation training; mounted, dismounted, and aerial training; road construction; culvert installation; construction and operation of a fuel facility on PCMS; invasive species treatments including use of toxic pesticides and herbicides; trail rehabilitation; bank sloping; and erosion control dam repair.

Army also failed to disclose testing of a smoke obscuration module during training and the 25-year renewal of an easement with Colorado Interstate Gas (CIG) for a lengthy natural gas pipeline that, since 1927, has run through the heart of native shortgrass prairie condemned to become Department of Army’s 235,000-acre sodbusting Piñon Canyon Maneuver Site.



The ill-conceived establishment of PCMS was accomplished when the government of the United States condemned the best shortgrass prairie land use—generational family ranching practices—for the worst.

Soils of the shortgrass prairie are highly erodible. Sodbusting grazing-dependent shortgrass prairie destroys deep-rooted native grasses that have evolved over 10,000 years to keep the soil in place and to trap moisture even during periods of drought and high wind.

Southeastern Colorado lies at the headwinds of the Dust Bowl of the 1930s. The epicenter of Dust Bowl impact is generally considered to be the Boise City, Oklahoma area, just 200 miles ESE (downwind) of PCMS. The dust that smothered Boise City originated just north of DOD's stupidly located military maneuver site.

Military training and operations at PCMS result in irreversible uprooting and disturbance of soils. In violation of NEPA, Army continues to fail to analyze and disclose to the public the erosion, sedimentation, loss of topsoil, drought and climate conditions and other soil issues, including contamination caused by military land use at PCMS. Enclosure 2.

The most significant ecological issue caused by military impacts: dust. "Fugitive Dust" is the real issue and Army, its contractors, and politicians know it. It is the most critical on-site issue as well as the most important off-site issue—including the Oklahoma panhandle, New Mexico, Kansas and Texas—because PCMS sits at the headwinds of the Dust Bowl.

As N1MA! has specifically pointed out for more than a decade, Army undermines and violates NEPA by excessive use of so-called "Records of Environmental Consideration" (RECs) that are conducted without public notice and involvement. 32 C.F.R. §651.19. Practically speaking, a REC is merely a list of backroom, bureaucratic excuses for not doing a NEPA review.

The continuing use and, in fact, increased use of RECs for this purpose at this point shows that Army's violations of NEPA are knowing and intentional.

In analyzing Army's NEPA noncompliance, it is significant to look at the larger picture. The 2015 PCMS Training and Operations Environmental Impact Statement (EIS), which was flawed to begin with, is four years out of date.

It did not include analysis of training use of PCMS by the 2018 conversion of an infantry brigade stationed at Fort Carson to an armored brigade—an Armored Brigade Combat Team (ABCT) includes: 5000 personnel; 90 Abrams tanks; 90 Bradley Fighting Vehicles (IFVs); 112 M113 vehicles; 15 5,000-gallon M969A1 tankers; and 48 2,500-gallon M978 Heavy Expanded Mobility Tactical Truck tankers which transport 195,000 gallons of fuel—for which Army prepared an Environmental Assessment but *specifically declined to consider training impacts to PCMS*.

It did not include analysis of conversion of an infantry brigade stationed at Fort Carson and training at PCMS to a Stryker brigade, more than 300 Stryker vehicles and 4500 personnel, announced in May 2019, for which Army prepared an Environmental Assessment but *specifically declined to consider training impacts to PCMS*.

It did not include the initiation of use of Gray Eagle drones during training exercises at PCMS, announced in September 2019, which Army is implementing absent public disclosure and participation in violation of NEPA.

It did not include plans announced by Army earlier in 2019 to move approximately 32 miles of CIG's natural gas pipeline from the middle length of PCMS to another undisclosed location which, reportedly, will open up an additional estimated 66,000 acres at PCMS to new training impacts.

It did not include plans or any scientifically-based analysis of impacts to construct 12 erosion control dams and 37 bank stabilizations on PCMS, announced in October 2018, for which no NEPA document was prepared.

Furthermore, the 2015 EIS projected "negligible to minor" adverse impacts to cultural resources at PCMS (p. S-7), not the much more significant effects of the recently proposed Colorado SHPO approach of simply "writing off" protections for protected cultural properties because of its view that repeat damage by Army training operations has made long-term protection of them untenable. (See also 2017 decision re: Army Integrated Cultural Resources Management Plan projecting no significant impact to cultural resources.)

*All of these individually, much less cumulatively, are significant new circumstances demanding new NEPA analysis, complete with robust public notice and participation, but Army knowingly and intentionally fails to comply. 40 C.F.R. §1502.9(c), 32 C.F.R. §651.5(g).*

### **Public Release of Internal Planning Documents**

Enclosure 1, Table 3 of the Annual Report refers to cultural resource document reviews that were done for the 2019 PCMS Area Development Plan, the 2019 Annual Review of the Integrated Cultural Resources Management Plan, and the Integrated Natural Resource Management Plan 2019 - 2024.

None of these documents has been released for public review and participation, and therefore none of them has been properly subject to NEPA environmental review. Further, since these plans can govern further development of PCMS, it is not clear that these plans, themselves, do not involve actions that require Section 106 procedures applicable to undertakings.

Therefore, Army should release these materials at once to allow verification that the Army is complying with NEPA and NHPA.

### **Sikes Act Violations**

The Army's Installation Natural Resource Management Plan (INRMP) is now two years out of date and is thus not in compliance with the Sikes Act. 16 U.S.C. §670a(b)(2). Despite N1MA's repeated notice of this violation, Army has not announced any plans to propose a new and revised INRMP.

In the past, instead of complying with the plain terms of the statute, it has relied on statements of a minor wildlife officer that Army could have a longer time than the 2013-2017 period explicitly stated in the plan. The cultural resources Annual Report references an INRMP for 2019 - 2024 in Enclosure 1, Table 3, but no such report has been released to the public.

It is clear that either Army is in violation of the Sikes Act in not doing a new and revised INRMP and that violation is knowing and intentional, or if an INRMP has secretly been done, but not released, that Army is knowingly and intentionally evading public review and comment also in violation of the Sikes Act, NEPA and potentially the NHPA.

## **Ongoing Freedom of Information Act Violations**

For the past two years, N1MA! has pointed out Army's lawless failure to provide responsive documents to a 2017 U.S. FOIA request by N1MA! for information pertaining to the application of highly toxic pesticides and herbicides on PCMS.

Army has admitted there were responsive documents to this request but, inexplicably, allegedly shipped them to the U.S. Environmental Protection Agency instead of to N1MA! and "administratively closed" the file.

Despite N1MA! raising this issue specifically over the last two years, Army has provided no responsive documents to N1MA!. Clearly, the Army's ongoing FOIA violations are knowing and intentional, while undisclosed application of pesticides and herbicides continues on invasive species propagated by military destruction of the grassland.

## **Unwelcoming Environment for Consultation**

Last year, N1MA! objected to the scheduling of the Annual Cultural Resources Consultation Meeting at Fort Carson because 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.

This year, Army is scheduling the meeting at the same location and has cited the availability of teleconferencing at Fort Carson (p. 51). Clearly, Army intends its meeting to be unwelcoming to interested members of the public.

## **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 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.

For example, the annual report suggests at ¶H, p. 3 that a responsive letter from Army somehow "resolved" N1MA!'s concerns expressed on the 2018 Annual Report. That is utterly false.

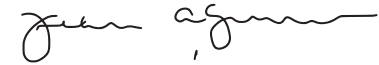
## **Termination of PA**

As asserted in 2017 and 2018, N1MA! continues to believe that the appropriate sanction for Army's dismal ongoing performance in protecting cultural resources is to terminate the 2014 Programmatic Agreement pursuant to 36 C.F.R. §800.14(b)(2)(iv) and Stipulation VII.E. of the 2014 PA.



In the future, at Piñon Canyon Maneuver Site, *each* undertaking should be preceded by a Section 106 undertaking analysis and Environmental Assessment, complete with public notice and robust public participation to satisfy the requirements of the National Historic Preservation Act and the National Environmental Policy Act.

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

**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, &amp; 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











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

November 10, 2020

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

Dear Ms. Aguerre:

Thank you your correspondence dated December 17, 2019, concerning the fiscal year (FY) 2019 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 FY2019 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, 719-744-6640; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,

RIVERO-  
DEAGUILAR.CAR  
LOS.1256627236

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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 FY2019 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 17, 2019, regarding the fiscal year (FY) 2019 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:** *More than anything, Army's 2019 Annual Report indicates a significant lack of progress over the last year on cultural resources issues, including a failure to address valid concerns raised by N1MA! and the Colorado State Historic Preservation Office (SHPO), and a failure to adequately address violations of the National Historic Preservation Act (NHPA) and the 2014 PA – to the bizarre point where SHPO is now suggesting that Army should consider giving up on protecting some otherwise protected historic properties, effectively allowing Army to destroy them in order to save money and enlarge its “training box” at PCMS (pp. 54-44).*

*N1MA! adamantly opposes such incongruous distortion which would effectively turn NHPA's mandate for protection of cultural resources properties on its head, turning the statute into an instrument, by contrast, for destroying protected properties.*

**USAG Fort Carson's Response #1:** The USAG Fort Carson addressed your comments on the FY2018 Annual Report in correspondence dated February 25, 2019, which was also included in Enclosure 4 of the FY2019 Annual Report.

Although USAG Fort Carson had not provided a response prior to the drafting of the FY2019 Annual Report, the SHPO's comments have been addressed in correspondence dated December 30, 2019.

Section 106 of the NHPA states federal agencies must consider the effects of federal undertakings on historic properties. The regulation that implements Section 106, 36 Code of Federal Regulations (CFR) Part 800, provides provisions on the resolution of adverse effects, which includes avoidance, minimization, and mitigation. If a federal undertaking cannot avoid or minimize adverse effects to a historic property, then mitigation is the appropriate approach to resolve for those adverse effects. While the resource may not be preserved in situ, the federal agency is preserving and sharing the significant data that can be gleaned from the resource for the benefit of the public through appropriate mitigation developed in consultation with the SHPO, Native American Tribes, local governments, and other consulting and interested parties.

**N1MA!'s Comment #2:** *The fact that Army fails to take concrete steps to address the systematic violations of NHPA, the National Environmental Policy Act (NEPA), the Sikes Act, and the Freedom of Information Act (FOIA), year after year, despite notice of their violations, indicates without doubt that Army is intentionally and systematically avoiding and undermining these crucially important statutes, operating secretly, without*

*transparency or validity, while conjuring false promises of “no significant impact,” “successful mitigation,” and claims of compliance with applicable laws.*

**USAG Fort Carson's Response #2:** Your comment is noted. Comments suggesting non-compliance with the National Environmental Policy Act (NEPA), Sikes Act, and Freedom of Information Act (FOIA) are better addressed outside the Cultural Resources Management Program, as follows:

Comments not previously answered in previous correspondence concerning NEPA should be directed to the NEPA Program Manager at:

Angie Bell  
NEPA Program Manager  
NEPA & Cultural Management Branch  
Environmental Division, Directorate of Public Works  
1626 Ellis Street  
Building 1219, Room 229  
Fort Carson, Colorado 80913  
719-526-4666  
Email: [angie.l.bell.civ@mail.mil](mailto:angie.l.bell.civ@mail.mil)

Comments not previously answered in previous correspondence concerning the Sikes Act should be directed to the Conservation Program, which is responsible for natural resources related issues, at:

Roger Peyton  
Chief, Conservation Branch  
Environmental Division, Directorate of Public Works  
1626 Ellis Street  
Building 1219, Room 318  
Fort Carson, Colorado 80913  
719-524-4395  
Email: [roger.d.peyton.civ@mail.mil](mailto:roger.d.peyton.civ@mail.mil)

Comments concerning FOIA should be directed to the Fort Carson FOIA/PA Office at:

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

**N1MA's Comment #3:** *The solution to Army's serial failure to protect cultural resource properties at PCMS begins not with giving up and just letting Army enlarge its “training box,” but rather with recognizing that certain avoidance strategies have completely failed and necessitate devising meaningful alternatives and doubling down on concrete new steps Army must take to ensure cultural resources on PCMS are meaningfully protected.*



*The “sacrifice” of some properties eligible for listing on the National Register of Historic Places has not and will not “save” others, but does have the effect of leading to even more losses. Further, it converts to a cruel fraud Army’s earlier public promises that there would be “negligible” impacts to cultural resources from training exercises at PCMS.*

*Army should be held to deliver on its promises through whatever means are necessary.*

**USAG Fort Carson’s Response #3:** The Army is not enlarging the “training box” at PCMS. The approximately 236,000-acre parcel is designated for military training. By realizing not all historic properties can be protected in situ and developing appropriate mitigations for adverse effects to these historic properties in consultation with SHPO, Native American Tribes, local governments, and other consulting and interested parties, USAG Fort Carson will be able to ensure the data from these sites are protected and made available for the public benefit.

**N1MA!’s Comment #4:** *Stipulation I.B requires Army to complete documentation of “needs data” sites within three years of signing the 2014 PA. That deadline was three years ago. Last year, 555 “needs data” sites were listed by Army. This year, there are 567 listed (Encl. 2, p. 15).*

*Documenting these sites is necessary to ensure they are not destroyed before their historic value is even determined. Protecting these sites is required by Stipulation III.A of the 2014. More than 800 supposedly “protected” sites are currently not protected (Encl. 2, p. 17). The Annual Report shows no meaningful progress, just tiny steps that amount to actual backsliding, years after the deadline Army agreed to meet.*

*The Annual Report’s claim that task necessary to satisfy Stipulation I.B. are “complete” is completely false. Army continues to maintain, baselessly, that no further surveys are required under the National Historic Preservation Act and 2014 Programmatic Agreement.*

**USAG Fort Carson’s Response #4:** Stipulation I.B of the PCMS PA states: “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 within three years of the last authorizing signature on this Agreement” (emphasis added). As explained in previous letters from USAG Fort Carson to N1MA!, 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 the FY2019 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.

Ninety-three percent (93%) of the PCMS has been inventoried; the remaining 7% is located within the canyon areas and interior fence boundary. Stipulation I.C of the PCMS PA states: "No additional survey is required within the APE **unless necessary to execute an undertaking not identified as exempted in Appendix 1**" (emphasis added). 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.

**N1MA!'s Comment #5:** *Stipulation III.D of the 2014 PA requires Army to provide aviation assets and military vehicles with global positioning system information concerning protected properties within one year of the 2014 PA, or by 2015, and to "implement" these protections. Years later, however, including as 2018 brigade exercise, this task was not implemented.*

*On numerous occasions, Army has reported that the appropriate GPS data was not uploaded to the systems used by military vehicles or was intentionally turned off for simulated "opposing forces." Army's claim that this task has been "completed" is completely false and no efforts at correcting these failures are reported. Instead, Army makes the farcical claim that all it has to do is provide the troops with the GPS data, but need not do anything to make sure it is used (p. 44).*

**USAG Fort Carson's Response #5:** A Resource Protection digital map has been developed and made available for use in global positioning systems (GPS) units of training aircraft and vehicles. The geodatabase used to produce this map is updated on a quarterly basis and prior to large scale exercises. It is provided to the 4<sup>th</sup> Infantry Division's Geospatial Office for distribution to the units. The USAG Fort Carson has met our obligation under Stipulation III.D.

**N1MA!'s Comment #6** *Stipulation VI.A of the 2014 PA requires Army to include in its annual report an "[a]cknowledgment of, and mitigation strategies for, cumulative effects not previously identified." N1MA! pointed out that this acknowledgment and discussion was totally omitted in Army's 2017 and 2018 Annual Reports.*

*This year's report contains the same omission, despite detailed information from the 2018 brigade after action report that numerous sites have been repeatedly and wrongfully entered during training exercises by Army military vehicles including tanks.*

**USAG Fort Carson's Response #6:** This comment has been addressed in previous letters from USAG Fort Carson to N1MA!. In accordance with Stipulation VI.A.9, Sections III.D and III.I of the FY2017 Annual Report acknowledge potential effects, including cumulative effects, and Section 106 consultation is ongoing to address potential adverse effects, including adverse cumulative effects, and to develop mitigation strategies.

Section III.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.

Sections III.D and III.I of the FY2019 Annual Report acknowledge potential effects, including cumulative effects, and Section 106 consultation is ongoing to address potential adverse effects, including adverse cumulative effects, and to develop mitigation strategies.

**N1MA!'s Comment #7:** *Under Stipulations II.B and III.C of the 2014 PA, Army agreed to prohibit use of military vehicles within the perimeter of protected properties.*

*After many violations of these provisions by Army (totaling 153 admitted violations) many remain outstanding and unresolved this year as last year—stemming from the 2010 Warhorse Rampage training exercise, the 2013 Warhorse Charge training exercise, the 2015 Raider Focus I training exercise, the 2017 Raider Focus II training exercise, and the 2018 Iron Strike training exercise.*

*Absurdly, Army denies that entering a protected property with tanks, other military vehicles, and aviation assets during training operations is a violation of the 2014 PA and the NHPA.*

*The 2014 PA, however, agreed to by Army, clearly states that entries of this type are "not permitted," II.B. Further, the legal effect of a violation of a programmatic agreement is that it is also a violation of NHPA. 36 C.F.R. §800.14(a)(4).*

*Army remains in violation of the 2014 Programmatic Agreement, as deficient as it is, and the National Historic Preservation Act, as it has been continuously for years.*

**USAG Fort Carson's Response #7:** This comment has been addressed in previous letters from USAG Fort Carson to N1MA!. The signatories of the PCMS PA acknowledged human-related impacts to protected resources may occur, particularly associated with brigade training exercises. As such, Stipulation IV outlines a robust inspection and monitoring program for protected resources. When inadvertent entries



or other impacts occur, these are reported to the SHPO, Native American Tribes, local governments, and other consulting and interested parties in accordance with Stipulation IV.C. After large scale exercises, after action inspections are conducted, and the results of which are reported to the SHPO, Native American Tribes, local governments, and other consulting and interested parties in accordance with Stipulation IV.B. We are in compliance with the 2014 PA and the NHPA.

**N1MAI's Comment #8:** *Stipulation III.A requires Army to provide protection measures for all historic properties at PCMS. On Nov. 29, 2018, Colorado SHPO wrote to Army that the use of so-called "administrative protections" and "Seibert stakes" had been shown to be not protective of these properties (p. 22).*

*More than one year later, Army has done nothing, and is merely rousing itself to draft a responsive letter (p. 2). The Annual Report still relies upon so-called administrative protections and Seibert stakes in support of Army's weak claims of compliance with the 2014 PA and the NHPA (p. 16).*

**USAG Fort Carson's Response #8:** The SHPO's comments on the FY18 Annual Report were addressed in correspondence dated December 30, 2019, and will be included in the FY20 Annual Report that will be sent via electronic mail to the SHPO, Native American Tribes, local governments, and other consulting and interested parties and will publically available by November 15, 2020, on the Fort Carson website: <https://carson.army.mil/organizations/dpw.html#three>.

**N1MAI's Comment #9:** *Stipulation V.A requires Army to conduct cultural resources awareness training "for all personnel involved in the execution of undertakings with the APE (Area of Potential Effects) on an annual basis." On Nov. 29, 2018, SHPO commented that annual training should be extended from just specially designated "environmental protection officers" to "all command positions" in light of the fact that violations are increasing despite current training efforts (pp. 28-29).*

*More than one year later, Army has done nothing and is merely rousing itself to draft a responsive letter (p. 2).*

**USAG Fort Carson's Response #9:** Please refer to our response for Comment #8 above.

**N1MAI's Comment #10:** *The list of Exempted Undertakings in Enclosure 1 reveals to the public for the first time a series of major federal actions that occurred on PCMS that were never disclosed to the public or properly analyzed for environmental effects under NEPA, particularly site-specific effects.*

*These include prescribed fire burns; training use of established ranges, drop zones, and other facilities; excavation training; mounted, dismounted, and aerial training; road construction; culvert installation; construction and operation of a fuel facility on PCMS; invasive species treatments including use of toxic pesticides and herbicides; trail rehabilitation; bank sloping; and erosion control dam repair.*

*Army also failed to disclose testing of a smoke obscuration module during training and the 25-year renewal of an easement with Colorado Interstate Gas (CIG) for a lengthy natural gas pipeline that, since 1927, has run through the heart of native shortgrass prairie condemned to become Department of Army's 235,000-acre sodbusting Piñon Canyon Maneuver Site.*

**USAG Fort Carson's Response #10:** Comments concerning NEPA are better addressed outside the Cultural Resources Management Program. Questions related to NEPA should be directed to the NEPA Program Manager, whose contact information is provided in our response to Comment # 2.

**N1MAI's Comment #11:** *The ill-conceived establishment of PCMS was accomplished when the government of the United States condemned the best shortgrass prairie land use—generational family ranching practices—for the worst.*

*Soils of the shortgrass prairie are highly erodible. Sodbusting grazing-dependent shortgrass prairie destroys deep-rooted native grasses that have evolved over 10,000 years to keep the soil in place and to trap moisture even during periods of drought and high wind.*

*Southeastern Colorado lies at the headwinds of the Dust Bowl of the 1930s. The epicenter of Dust Bowl impact is generally considered to be the Boise City, Oklahoma area, just 200 miles ESE (downwind) of PCMS. The dust that smothered Boise City originated just north of DOD's stupidly located military maneuver site.*

**USAG Fort Carson's Response #11:** Your comment is noted. The establishment of PCMS in the 1980s by the United States Government and the fact that southeastern Colorado lies at the headwinds of the Dust Bowl of the 1930s are not directly related to the FY19 Annual Report. The Dust Bowl was a culmination of several years of extreme drought and poor ranching and farming practices that denuded the landscape of vegetation. As a result of the Dust Bowl and its impact on the American economy, much has changed in rangeland management. PCMS was not established until 1983, 50 years after the Dust Bowl, and was not the cause of the Dust Bowl.

**N1MAI's Comment #12:** *Military training and operations at PCMS result in irreversible uprooting and disturbance of soils. In violation of NEPA, Army continues to fail to analyze and disclose to the public the erosion, sedimentation, loss of topsoil, drought and climate conditions and other soil issues, including contamination caused by military land use at PCMS. Enclosure 2.*

**USAG Fort Carson's Response #12:** Please refer to our response to Comment #10 above.

**N1MAI's Comment #13:** *The most significant ecological issue caused by military impacts: dust. "Fugitive Dust" is the real issue and Army, its contractors, and politicians know it. It is the most critical on-site issue as well as the most important off-site issue—including the Oklahoma panhandle, New Mexico, Kansas and Texas—because PCMS sits at the headwinds of the Dust Bowl.*

**USAG Fort Carson's Response #13:** Comments about fugitive dust are better directed outside the Cultural Resources Management Program. Questions concerning the Clean Air Act and fugitive dust should be directed to the Compliance Program at:

John Wachter  
Chief, Compliance Program  
1626 Evans Street  
Building 1219, Room 218  
Fort Carson, Colorado 80913  
719-526-1694  
Email: [john.p.wachter.civ@mail.mil](mailto:john.p.wachter.civ@mail.mil)

**N1MA!'s Comment #14:** *As N1MA! has specifically pointed out for more than a decade, Army undermines and violates NEPA by excessive use of so-called "Records of Environmental Consideration" (RECs) that are conducted without public notice and involvement. 32 C.F.R. §651.19. Practically speaking, a REC is merely a list of backroom, bureaucratic excuses for not doing a NEPA review.*

*The continuing use and, in fact, increased use of RECs for this purpose at this point shows that Army's violations of NEPA are knowing and intentional.*

**USAG Fort Carson's Response #14:** Please refer to our response to Comment #10 above.

**N1MA!'s Comment #15:** *In analyzing Army's NEPA noncompliance, it is significant to look at the larger picture. The 2015 PCMS Training and Operations Environmental Impact Statement (EIS), which was flawed to begin with, is four years out of date.*

*It did not include analysis of training use of PCMS by the 2018 conversion of an infantry brigade stationed at Fort Carson to an armored brigade—an Armored Brigade Combat Team (ABCT) includes: 5000 personnel; 90 Abrams tanks; 90 Bradley Fighting Vehicles (IFVs); 112 M113 vehicles; 15 5,000-gallon M969A1 tankers; and 48 2,500-gallon M978 Heavy Expanded Mobility Tactical Truck tankers which transport 195,000 gallons of fuel—for which Army prepared an Environmental Assessment but specifically declined to consider training impacts to PCMS.*

*It did not include analysis of conversion of an infantry brigade stationed at Fort Carson and training at PCMS to a Stryker brigade, more than 300 Stryker vehicles and 4500 personnel, announced in May 2019, for which Army prepared an Environmental Assessment but specifically declined to consider training impacts to PCMS.*

*It did not include the initiation of use of Gray Eagle drones during training exercises at PCMS, announced in September 2019, which Army is implementing absent public disclosure and participation in violation of NEPA.*

*It did not include plans announced by Army earlier in 2019 to move approximately 32 miles of CIG's natural gas pipeline from the middle length of PCMS to another*

*undisclosed location which, reportedly, will open up an additional estimated 66,000 acres at PCMS to new training impacts.*

*It did not include plans or any scientifically-based analysis of impacts to construct 12 erosion control dams and 37 bank stabilizations on PCMS, announced in October 2018, for which no NEPA document was prepared.*

*Furthermore, the 2015 EIS projected "negligible to minor" adverse impacts to cultural resources at PCMS (p. S-7), not the much more significant effects of the recently proposed Colorado SHPO approach of simply "writing off" protections for protected cultural properties because of its view that repeat damage by Army training operations has made long-term protection of them untenable. (See also 2017 decision re: Army Integrated Cultural Resources Management Plan projecting no significant impact to cultural resources.)*

*All of these individually, much less cumulatively, are significant new circumstances demanding new NEPA analysis, complete with robust public notice and participation, but Army knowingly and intentionally fails to comply. 40 C.F.R. §1502.9(c), 32 C.F.R. §651.5(g).*

**USAG Fort Carson's Response #15:** Please refer to our response on Comment #10.

**N1MAI's Comment #16:** *Enclosure 1, Table 3 of the Annual Report refers to cultural resource document reviews that were done for the 2019 PCMS Area Development Plan, the 2019 Annual Review of the Integrated Cultural Resources Management Plan, and the Integrated Natural Resource Management Plan 2019 - 2024.*

*None of these documents has been released for public review and participation, and therefore none of them has been properly subject to NEPA environmental review. Further, since these plans can govern further development of PCMS, it is not clear that these plans, themselves, do not involve actions that require Section 106 procedures applicable to undertakings.*

*Therefore, Army should release these materials at once to allow verification that the Army is complying with NEPA and NHPA.*

**USAG Fort Carson's Comment #16:** The 2019 Annual Review of the 2017-2021 Integrated Cultural Resources Management Plan (ICRMP), as well as previous annual reviews, can be found in Appendix G of the ICRMP that is publically available online on the Fort Carson website: <https://carson.army.mil/organizations/dpw.html#three>. Annual reviews of the ICRMP are completed for informative purposes to update project status, points-of-contacts, and other minor edits. No major updates nor revisions to the ICRMP are made during the annual review. If a major update or revision were necessary, then the ICRMP would undergo public review and comment.

Please refer to our response to Comment #10 concerning comments on NEPA related issues.



You may submit a FOIA request to the Fort Carson FOIA/PA office at:

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

**N1MA!'s Comment #17:** *The Army's Installation Natural Resource Management Plan (INRMP) is now two years out of date and is thus not in compliance with the Sikes Act. 16 U.S.C. §670a(b)(2). Despite N1MA!'s repeated notice of this violation, Army has not announced any plans to propose a new and revised INRMP.*

*In the past, instead of complying with the plain terms of the statute, it has relied on statements of a minor wildlife officer that Army could have a longer time than the 2013-2017 period explicitly stated in the plan. The cultural resources Annual Report references an INRMP for 2019 – 2024 in Enclosure 1, Table 3, but no such report has been released to the public.*

*It is clear that either Army is in violation of the Sikes Act in not doing a new and revised INRMP and that violation is knowing and intentional, or if an INRP has secretly been done, but not released, that Army is knowingly and intentionally evading public review and comment also in violation of the Sikes Act, NEPA and potentially the NHPA.*

**USAG Fort Carson's Response #17:** Comments concerning the Sikes Acts are better directed outside the Cultural Resources Management Program. All questions or concerns about the INRMP can be directed to the Conservation Program, for which the point-of-contact information was provided in our response to Comment #2.

**N1MA!'s Comment #18:** *For the past two years, N1MA! has pointed out Army's lawless failure to provide responsive documents to a 2017 U.S. FOIA request by N1MA! for information pertaining to the application of highly toxic pesticides and herbicides on PCMS.*

*Army has admitted there were responsive documents to this request but, inexplicably, allegedly shipped them to the U.S. Environmental Protection Agency instead of to N1MA! and "administratively closed" the file.*

*Despite N1MA! raising this issue specifically over the last two years, Army has provided no responsive documents to N1MA!. Clearly, the Army's ongoing FOIA violations are knowing and intentional, while undisclosed application of pesticides and herbicides continues on invasive species propagated by military destruction of the grassland.*

**USAG Fort Carson's Response #18:** Please refer to our response on Comment #2.

**N1MA!'s Comment #19:** *Last year, N1MA! objected to the scheduling of the Annual Cultural Resources Consultation Meeting at Fort Carson because 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.*

*This year, Army is scheduling the meeting at the same location and has cited the availability of teleconferencing at Fort Carson (p. 51). Clearly, Army intends its meeting to be unwelcoming to interested members of the public.*

**USAG Fort Carson's Response #19:** Your comment is noted. This comment has been addressed in our February 25, 2019, letter (USAG Response #22).

**N1MA!'s Comment #20:** *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 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.*

*For example, the annual report suggests at ¶H, p. 3 that a responsive letter from Army somehow “resolved” N1MA!'s concerns expressed on the 2018 Annual Report. That is utterly false.*

**USAG Fort Carson's Response #20:** Your comment is noted. We will clarify in the FY20 Annual Report that N1MA! will not “accept” or “agree to” or “be satisfied by” our response to your organization's comments.

**N1MA!'s Comment #21:** *As asserted in 2017 and 2018, N1MA! continues to believe that the appropriate sanction for Army's dismal ongoing performance in protecting cultural resources is to terminate the 2014 Programmatic Agreement pursuant to 36 C.F.R. §800.14(b)(2)(iv) and Stipulation VII.E. of the 2014 PA.*

*In the future, at Piñon Canyon Maneuver Site, each undertaking should be preceded by a Section 106 undertaking analysis and Environmental Assessment, complete with public notice and robust public participation to satisfy the requirements of the National Historic Preservation Act and the National Environmental Policy Act.*

**USAG Fort Carson's Response #21:** Your comment is noted.