

The following presents the Fiscal Year (FY) 2021 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 (101 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 (79 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 (88 pages)*

FISCAL YEAR (FY) 2021 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, 2021

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, 2020, through September 30, 2021, 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, 2020, and September 30, 2021. One hundred seventy-three 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. Eleven undertakings required Section 106 consultation. Section 106 consultation has been completed for nine undertakings (2021-007, 2021-018, 2021-053/106, 2021-074, 2021-068, 2021-136/246, 2021-147, 2021-162, and 2021-182). NEPA Project No. 2021-181 was canceled prior to initiation of Section 106 consultation. Consultation has not been initiated for one undertaking (CF2021-007).

The following is an update to the status of Section 106 consultation continuing from the fiscal year 2020 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 and 2020-054/073/309 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS: Section 106 consultation is still ongoing for APEs in Bird Farm Recreation Area, Turkey Creek Complex, and Wildlife Demonstration Area.
- 2020-010 Repair Leak in Basin of Spring Branch Reservoir: This project has been pushed to 2025, therefore, Section 106 consultation has not been initiated. An inventory and evaluation of Spring Branch Reservoir and Ditch was completed as part of a larger irrigation network historic context study, but the CRM has determined more fieldwork and archival research is required prior to making a determination of eligibility.
- 2020-221 Repairs to an Irrigation System in Turkey Creek Complex, Fort Carson: Section 106 consultation was completed in August of 2021. The SHPO concurred with the determinations of eligibility and the finding of no adverse effects to historic properties via correspondence dated July 9, 2021 (HC #79926). Responses were also received from the Northern Cheyenne Tribe and Pawnee Nation of Oklahoma; 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 20 undertakings include document reviews, undertakings with no potential to affect 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 December 12, 2020 (HC #58731, HC #63877, and HC #65747), the SHPO requested USAG Fort Carson conduct a “quantifiable analysis of the effectiveness of the training” to help determine gaps in the training provided to Soldiers, Civilians, and other users. The SHPO also requested information on the types of training provided for different levels of personnel.

Enclosure 2 includes the SHPO’s December 12, 2020, letter, and the USAG Fort Carson’s response to the SHPO dated January 8, 2021.

B. Inventory and Survey of the APEs

An inventory and evaluation of four bridges and culverts that are 45 years or older was completed by Sol Solutions, LLC, in response to an undertaking review for 2021-053/106 (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 February 5, 2021 (HC #79108).

C. Exempted Undertakings

See Table 1 of Enclosure 1. As of September 30, 2021, 173 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

The following is a summary of a post-review discovery that occurred during the reporting year.

CF2021-011: Building 305 on Fort Carson is currently undergoing asbestos remediation prior to demolition. While removing asbestos-contaminated soil under the crawl space of the building, faunal remains were discovered by the asbestos remediation contractor. On July 26, 2021, the Cultural Resources Manager (CRM) was notified of the discovery by the Fort Carson Conservation Branch, who was contacted by the contractor when they realized these were not small to medium mammals that had crawled under the building and died. After reviewing the photographs provided by the contractor, the CRM determined this was not a previously identified cultural resource, and requested the contractor stop all work in the immediate vicinity until the discovery could be assessed and recorded.

The Fort Carson Directorate of Public Works, U.S. Army Corps of Engineers – Omaha District, who is managing the contract, and the contractor discussed viable options to allow assessment of the faunal remains. It was decided the best approach would be to have the contractor live stream a video of the discovery while the CRM provided instructions of what to do. The live stream can be viewed here: <https://gopro.com/v/B28pVpRQJJN24>. The CRM also requested the contractor to photograph both the displaced pile of bones, as well as those that may be in situ. The displaced faunal remains were bagged and removed from the crawl space. The bags were decontaminated by dipping them in water buckets – one mixed with a special soap solution and one with just plain water. The bags were then handed to the CRM for examination. Select bones were decontaminated for closer inspection and analysis. This assessment was completed on August 9, 2021.

Site 5EP9624 consists of culturally modified faunal remains. The majority of the faunal remains belong to the *Bos* genus. Minimum number of individuals represented equals two. The remains include proximal long bones, ribs, and vertebrae. Based on the butchering marks, which appear to have been made by modern butchering tools (electric saws and knives), and location of the cut marks, these remains are modern bovine. Desiccated tissue was observed on a few of the collected bones. The faunal remains appear to be localized along an underground pipe that was installed during the building's construction in 1951. The remains were probably deposited pre-1942 when the property was acquired by the Department of the Army, and were disturbed by the installation of the utility pipe. The site was further disturbed during the removal of asbestos-contaminated soil. The contractor piled several bones in an area 10 feet away from the hole in which several of the bones were discovered. Bones can be seen sticking out from the walls of the hole, which is approximately 18 inches deep. At this depth, the soil still contains asbestos associated with the pipe insulation. Charcoal flecks were observed in the soil surrounding the faunal remains, but the contractor reports that charcoal flecks are common throughout the crawl space. No other archaeological materials were observed. The soil immediately surrounding the bones is slightly darker (7.5YR 3/2) than the surface soil (7.5YR 4/2), and is associated with the decay of organic materials. Plus, what appears to be animal hair was recovered.

Preliminary archival research shows that the City of Colorado Springs owned the property prior to Army acquisition. A 1937 aerial image shows the area was largely rural prior to the construction of the World War II-era cantonment. Real property records indicate the building was constructed in August of 1951, and originally functioned as a supply services administration building.

The site does not meet the significance criteria for inclusion in the NRHP. After consulting with the SHPO via email on August 8, 2021, and receiving concurrence with the determination of eligibility and our proposed action via email on August 12, 2021, USAG Fort Carson authorized the contractor to continue asbestos remediation and demolition of Building 305. All asbestos-contaminated soils plus 2 inches of clean soil will be bagged and removed from the site for proper disposal. This will include any remaining faunal remains in the soil, as well as the collected bones that have not been decontaminated and the potential animal hair, which cannot be decontaminated. The contractor will provide information on depth, location, and boundary of the observed faunal remains. If other potential features or artifacts are encountered, the contractor shall consult with the Fort Carson Cultural Resources Program. Final site documentation and associated report will be submitted to the SHPO when the ground-disturbing activities have been completed.

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. 2020-02875 (Wild Horse Wildland Fire): This wildland fire started on October 11, 2020, with fire suppression activities concluding on October 20, 2020. Approximately 647.75 acres were burned within the Turkey Creek Complex and Training Areas 17 and 18. Seven protected resources were within the fire's footprint. None were adversely affected by the wildland fire or associated fire suppression activities.
- Incident No. 2020-03102: This wildland fire started on November 2, 2020, with fire suppression activities concluding the same day, at the Cheyenne Shadows Golf Course. There were no historic properties within the fire footprint.

G. Amendment

A Third Amendment to the Fort Carson Built Environment PA that extends the duration of the PA until December 31, 2022, was executed on December 18, 2020.

On September 28, 2021, USAG Fort Carson notified the ACHP, SHPO, Tribes, and other consulting and interested parties of our intention to implement the Army Alternate Procedures (AAP), and requested point-of-contact information for those interested in collaborating with USAG Fort Carson in the development of a Historic Properties Component. Implementation of the AAP would supersede the Fort Carson Built Environment 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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Joe Wyka
Director, Public Works

ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY21 REPORTING PERIOD (OCTOBER 1, 2020, THROUGH SEPTEMBER 30, 2021) 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
2021-002 Install New Curb Sign and Parking Reserve Sign, Bldg. 1118	GAR20-005	Main Post	BE I.A2	10/6/2020	
2021-004 Renovate Bldg. 7416	SFG19-017 W9128F-19-R-0041 W9128F-19-R-0044 W9128F-20-C-0017	Main Post	BE I.A2	10/6/2020	<p>2021-004 is the review of the corrected copies of the 60% and 100% building design.</p> <p>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.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2020-035, 2020-248, 2020-277, & 2020-290.</p>
2021-009 Install 120'x120' Turf Field and 0.5-mile Crusher Run Track, Fort Carson	SFG20-017	Main Post	BE I.A1	10/20/2020	Proposed work includes: construct a 120-foot-by120-foot concrete pad onto which a turf field will be placed; and construct a 0.5-mile running track at 14 feet wide with crushed run base coarse material.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-010 Install Non-Secure Internet Protocol Router (NIPR) Access to Bldg. 6110	MED21-001	Main Post	BE I.A1 BE I.A2	10/21/2020	Proposed work includes: trench or bore 12-strand fiber optic cable from a pedestal splice point; install fiber optic patch panel within Bldg. 6110; fusion splice on both ends; install two data outlets with cable for Script RX System; core drill buildings wall; install switch in Exchange Communications room; install one camera for Closed Circuit Television (CCTV); install new circuits and power outlets (30AMP and 120/240V AC); and replace windows.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-019 & 2021-042 Upgrade Traffic Signal at the Intersection of Nelson Blvd & Chiles Ave, Fort Carson	DPW17-058	Main Post	BE I.A2	10/28/2020 11/6/2020	<p>2021-019 project is the initial review of project that was cancelled; 2021-042 is the updated review due to change in project scope.</p> <p>Proposed work includes: replace existing span-wire signals with signal mast arms; add protected left turn signals in all directions; add pedestrian signals; replace traffic control cabinet and all components; refeed power supply to cabinet from nearby electrical panel; upgrade traffic detectors from loops to radar; remove 2 pedestrian crosswalks, related curb ramps and signal on Nelson Blvd., west of Chiles Ave; re-align paved multi-use trail and merge with adjacent sidewalk and remaining crosswalk; remove/relocate pavement marking on eastbound approach to the intersection, adjacent to remaining crosswalk; remove and relocate pavement marking on the northbound approach to the intersection; and install new crosswalk striping with curb ramps and sidewalk connections on both ends of the new crosswalk.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2017-050.</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
2021-020, 2021-021, 2021-081, 2021-089, 2021-151 & 2021-178 Construction and Operation of a Defense Logistics Agency (DLA) Facility	CIV21-013	Main Post	BE I.A1	11/10/2020 11/12/2020 12/17/2020 3/26/2021	2021-081 is the dig permit for the geotechnical soil boring. 2021-020 is information for the site characterization study. 2021-178 is the review of the draft site characterization study. 2021-021, 2021-089, & 2021-151 are reviews of the draft Environmental Assessment and Finding of No Significant Impacts. Undertaking has been previously reviewed under NEPA Project No. 2017-072, 2017-197, 2017-274, 2018-086, & 2018-213.
2021-022 Repair West Exterior Doors, Bldg. 9062	1BD18-015	Main Post	BE I.A2	11/4/2020	
2021-023 Install Temporary C-Wire Picket Stakes, Bldg. 2557	2BD21-002	Main Post	BE I.A1 BE I.A3	11/4/2020	Proposed work includes: install multiple picket stakes into ground within 150-foot-by150-foot area west of Bldg. 2557; and remove stakes within a few days of installation.
2021-024 & 2021-064 Improve Intersection at Wetzel Avenue and Hogan Street, Fort Carson	DPW20-036	Main Post	BE I.A2	11/5/2020	Proposed work includes: re-align the westbound approach on Hogan St. to reduce the approach angle; and modify the existing curb lines, shoulders, pavement and pavement marking as required to support the new alignment.
2021-026 & 2021-028 Repair Fire Alarm Panels Post-wide, Bldgs. 1392, 1682, 1692, 1882, 1982, 2082, 2392, 2692, 2792, 2992, 3090, 3092, 3192, 3292, 3292, 3708, 3711, 8142, 8152, 8300, & 9072	DPW20-045 DPW20-046	Main Post	BE I.A2	11/5/2020	
2021-027 & 2021-032 Installation of Integrated Commercial Intrusion Detection System (ICIDS-IV), Bldg. 9667	DPW20-086 DPW20-087	Main Post	BE I.A2	11/5/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-029 Construct Track and Pedestrian Lighting around 2 nd Infantry Brigade Combat Team (2IBCT) Headquarters (HQ), Fort Carson	2BD20-007	Main Post	BE I.A1	11/5/2020	
2021-030 Repair 2050 Quad, Fort Carson	DPW19-083	Main Post	BE I.A2 BE I.A3 BE I.B2 BE I.B3	11/5/2020	Proposed work includes: reroute hubbed communication lines that support surrounding barracks; renovate Bldg. 2056 for laundry/charge of quarters (CQ) desk; add covered patio to east side of building; repair basketball court; place landscaping rock and trees to repair grounds and erosion; remove outdated site features and physical training (PT) equipment; place boulders for perimeter access control; repair/replace damaged sidewalks; and install rubber PT pit and perimeter fence.
2021-031 Construct Entrance Sign at Butts Army Airfield	BAA21-001	Main Post	BE I.A1	11/5/2020	
2021-035 Demo Marquee Sign, Bldg. 1129	DPT20-013	Main Post	BE I.A3	11/6/2020	
2021-036 Expand Multimedia Workstation, Bldg. 1517	DPT20-017	Main Post	BE I.A2	11/6/2020	
2021-038 Repair Electrical, Bldg. 1445	4ID20-024	Main Post	BE I.A2	11/6/2020	
2021-039 Install Manhole Riser Ring on Ellis St., Fort Carson	DIR20-001	Main Post	BE I.A2	11/6/2020	
2021-040 Relocate Furnace Air Intakes, Bldgs. 2705, 8211, & 9653	CIV20-008	Main Post	BE I.A2	11/6/2020	Proposed work includes: relocate the furnace exhausts up through the roof and away from the ventilation air intake.
2021-041 Install 120-208V AC 3-Phase Breaker Box, Bldg. 8000	CIV19-022	Main Post	BE I.A1 BE I.A2	11/6/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-043 Install Three Wall Outlets and Remove Furniture Outlets and Old Wiring, Room 101, Bldg. 515	TEN20-024	Main Post	BE I.A2	11/6/2020	
2021-045, 2021-214, & 2021-244 Construction, Operation, and Maintenance of Fire Station near Gate 6, Wilderness Rd., Fort Carson	PN76447	Main Post	BE I.A1	11/12/2020 6/2/2021 7/6/2021	<p>2021-045 is the initial review of the proposed satellite fire station move from Turkey Creek Complex to Gate 6 due to funding constraints. 2021-214 is the review of 35% design. 2021-244 is the updated review of the project.</p> <p>Proposed work includes: construct a small non-standard Fire Station Support Facility on a 300-foot-by250-foot site on Wilderness Road near Gate 6; install apparatus bays for three fire trucks/support vehicles; construct a residential area with five dorm rooms and administration area for basic operations, communication, and training; install concrete drives, access road and parking lot; and install storm drainage around facility.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2019-136, 2019-233, 2019-273, and 2021-355 at the previous location in Turkey Creek Complex.</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
2021-046 Demolition/Renovation Project, 2450 Quad, Fort Carson	DPW19-084	Main Post	BE I.A1 BE I.A2 BE I.A3 BE I.B2 BE I.B3	11/12/2020	Proposed work includes: demolish Bldg. 2455; reroute hubbed communication lines that support surrounding barracks; renovate Bldg. 2456 for laundry/CQ desk; add covered patio to east side of building; repair basketball court; place landscaping rock and trees to repair grounds and erosion; remove outdated site features and PT equipment; place boulders for perimeter access control; repair/replace damaged sidewalks; and install rubberized PT pit and perimeter fence.
2021-047 Repair Water Mains, Tevis St and North of O'Connell Blvd, Fort Carson	DPW15-114 DPW21-049 DPW21-050	Main Post	BE I.A2	11/12/2020	Proposed work includes: design and place approximately 750 linear feet of 20-inch water main and 2,310 linear feet of 18-inch water main; cap and abandon the existing 20-inch and 18-inch water mains; connect new water main into existing branch lines with new valves; replace existing 20-inch and 18-inch valves; and install additional valves at the same location and connect them to the new main. Undertaking has been previously reviewed under NEPA Project No. 2016-102.
2021-049 Construction of Three Company Operations Facilities (COFs) near Butts Army Airfield.	BAA21-004	Main Post	BE I.A1	11/18/2020	2021-049 is a dig permit for geotechnical soil testing associated with the project. Section 106 consultation was completed on 10/12/2011 prior to the execution of the Fort Carson Built Environment PA. Undertaking is related to NEPA Project No. CF2011-011; 2018-229, 2019-178, 2019-374, 2020-296, & 2020-304.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-050 Repair Iron Horse Park Walking Trail, Fort Carson	DPW20-021	Main Post	BE I.A1 BE I.A2	11/18/2020	Proposed work includes: repair and provide new concrete sidewalk; repair the existing asphalt trail along the route by milling/demolishing existing failed asphalt and replace with new asphalt pavement surface; and correct drainage as required.
2021-051 & 2021-101 Special Operations Forces (SOF) Tactical Equipment Maintenance Facility (TEMF)	PN66326	Main Post	BE I.A1 BE I.A3	11/18/2020 1/25/2021	2021-051 is the 95% design review; 2021-101 is the final review. Undertaking has been previously reviewed under NEPA Project No. 2019-263, 2019-302, & 2020-257.
2021-052 Citizens Broadband Radio Service (CBRS) Network Deployment Location, Fort Carson	CIV21-006	Main Post	BE I.A1	11/18/2020	Proposed work includes: installation of 60-foot utility poles with wireless propagation equipment at Specker Ave (near Weston St), Sheridan Ave/Prussman Blvd, Nelson Blvd (near Pershing Dr), Prussman Blvd/Wetzel Ave, and Nelson Blvd/Chiles Ave to support autonomous vehicles.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-053 & 2021-106 Repair Bridge Safety Features Post-wide, Fort Carson	DPW21-006	Main Post Downrange Fort Carson	BE I.A2 FC D1b	11/18/2020 2/5/2021	<p>Twenty-four bridges and culverts require repairs or upgrades to meet safety requirements. Four 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>Section 106 consultation was completed in February 2021 as part of NEPA Project No. 2021-053 for these four 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.</p>
2021-054 & 2021-143 Construction and Operation of a Training Facility, Fort Carson	DPT21-002	Main Post	BE I.A1	11/20/2020 3/11/2021	<p>2021-054 is a dig permit for the geotechnical soil boring. 2021-144 is the 60% design review.</p> <p>Undertaking has been previously reviewed under NEPA Project No. 2019-202, 2019-260, 2020-037, & 2020-125.</p>
2021-055 Install Electrical Outlet and Garbage Disposal, Bldg. 6215	MWR18-022	Main Post	BE I.A2	11/24/2020	
2021-056 Remove Mailboxes and Add a Doorway in the Hallway, Bldg. 7400	SFG21-001	Main Post	BE I.A2	11/24/2020	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-057 & 2021-177 Construct and Operate a Physical Fitness Facility, Wilderness Road	PN 58139	Main Post	BE I.A1	11/25/2020 4/5/2021	2021-057 is the 95% design review. 2021-177 is an updated review as it had been over 6 months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA No. 2019-227.
2021-058 Replace Concrete, Bldg. 1070	MWR21-003	Main Post	BE I.A2	11/30/2020	
2021-059 Winter Wonderland Holiday Card Lane Event, Iron Horse Park	MWR21-002	Main Post	BE I.B1	11/30/2020	
2021-060 Repair Exterior Wall, Bldg. 9442	2BD19-004	Main Post	BE I.A2	12/3/2020	
2021-061 Install Berm within a 50 x 50 Meter Area, Bldg. 9466	2BD21-004	Main Post	BE I.A1	12/1/2020	
2021-063 Install Security Systems, Bldg. 8932	TEN21-003	Main Post	BE I.A2	12/4/2020	
2021-065 Replace Pool Liner, Bldg. 1446	MWR16-002	Main Post	BE I.A2	12/4/2020	
2021-066 Install Two New Water Fountains, Bldg. 7464	SFG21-002	Main Post	BE I.A2	12/4/2020	
2021-067 & 2021-239 Install Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights, Runway 31, BAAF	BAA21-003 BAA21-014	Main Post	BE I.A1	12/8/2020 6/29/2021	2021-067 is the original review of the project, while 2021-239 is an updated review of the project with new project number.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-069 Construction, Operation, and Maintenance of a Cellular Tower, Rattle Snake Ridge, Fort Carson	MCA21-001 CIV21-002	Main Post	BE I.A1	12/8/2020 3/8/2021	BOINGO Wireless proposes to install a 110-foot-tall steel monopole cellular macro tower north of the Cheyenne Shadows Golf Course and south of the Fort Carson water tank to enhance multiple cellular carriers' coverage and capacity. It will be constructed within an approximately 70-foot-by-35-foot fenced ground space with equipment pads, equipment cabinets, and new electrical.
2021-070 Construction, Operation, and Maintenance of Child Development Center, Fort Carson	PN 96981	Main Post	BE I.A1	12/15/2020	Proposed work includes: construct a small (126 children) standard design child development center with outdoor play areas with child development equipment, safety surfacing and fencing; installation of video monitoring, alarm, and intercom systems for safety, information systems, fire protection and alarm systems; installation of Intrusion Detection System (IDS) and Energy Monitoring Control Systems (EMCS) connection; and to include all utilities and connections, lighting, paving, parking, curbs and gutters, storm drainage, landscaping and signage.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-071, 2021-072, & 2021-073 Privatized Military Family Housing, Fort Carson	n/a	Main Post	BE I.A1 BE I.A2 BE I.A3	12/9/2020	<p>2021-073 is the review of the preliminary draft supplemental EA to analyze the environmental and socioeconomic impacts associated with Privatized Military Family Housing. This EA supplements the 1996 and 2012 EAs. 2021-071 is a review of the 1996 EA; 2021-072 is a review of the 2012 EA.</p> <p>Section 106 consultation was completed in September of 2009 (NEPA Project No. 2009-727) for the construction of new military family housing in three areas (CHS #55426); December of 2011 (Project No. CF2012-001) for the demolition of military family housing and construction of new military family housing in Cherokee Village East (CHS #60888); and October of 2012 (NEPA Project No. 2012-272) for the demolition of the Old Hospital Complex and construction of new military family housing in this area (CHS #60662).</p> <p>All undertakings that occur at Capehart-era military family housing are exempted from additional Section 106 consultation in accordance with the Program Comment for Capehart and Wherry Era Army Family Housing and Associated Structures and Landscape Features (1949-1962). Fort Carson has no Wherry-era military housing and no military housing that pre-dates 1949.</p>

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2021-074 Prairie Dog Control at Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	BE I.B2 FC D2b PC A3b PC B4b2	12/14/2020	<p>Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; EFMP training complex; Minick Ave.; Ranges 11, 24, 29, 45, 63/65, 104, 105, 109, 111, 115A, 115B, 117, 119, 121C, 139, 143, 145, 147/147A, 151, 153, & 155; the Ammunition Supply Point; and Turkey Creek Ranch on Fort Carson; the 11A MOUT site (4 Corners) and 3A at PCMS; and PCMS Airfield.</p> <p>Section 106 consultation was completed in July 2019 for the Turkey Creek Complex as part of NEPA Project No. 2019-168. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA for more information.</p>
2021-075 Install Security Measures, Bldg. 7493	MED21-003	Main Post	BE I.A2	12/14/2020	<p>Proposed work includes: install badge readers at two interior south entrances of the first floor, install two south stairwell doors on second, third, and fourth floors; install badge readers on both elevators; and program the badge readers to open on specific floors.</p>

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2021-076, 2021-150, 2021-237, & 2021-294 Quarterly Record of Environmental Consideration (REC) for Training	DPT21QRT2 DPT21QRT3 DPT21QRT4 DPR22QRT1	Main Post Downrange Fort Carson PCMS Cantonment 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	12/14/2020 3/15/2021 6/24/2021 9/23/2021	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.
2021-079 Install APE 1412 Spent Brass Sorter, Bldg. 9368	CIV21-012	Main Post	BE I.A2	12/15/2020	
2021-083 Repair Parking Lot, Bldg. 1040 & 1045	DPW18-014	Main Post	BE I.A2	12/23/2020	
2021-084 Install CCTV Camera System at Ammunition Supply Point, Bldgs. 9368, 9374, & 9379	CIV21-008	Main Post	BE I.A2	12/28/2020	
2021-090 Implement Fuels Management Projects, Fort Carson and PCMS	DPW21-018	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Lettered TAs	BE I.B3 FC D2b PC B4b2 PC C2b3	1/21/2021	Several of the proposed locations were also reviewed under NEPA Project No. 2018-001, 2018-004, 2018-119, 2018-205, 2018-333, 2019-259, 2020-054, 2020-073, & 2020-309. Information provided to proponent for avoidance of protected cultural resources.

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2021-091 Install Two 20-amp Circuits and Wall Air Conditioner, Bldg. 1048	4SB21-001	Main Post	BE I.A2	1/11/2021	
2021-093 Construct and Repair Sidewalks, Bldgs. 1200-1201, 1959, 2070, 2150, 2450, 2992-3092, 6221, & 7500	DPW19-023	Main Post	BE I.A1 BE I.A2	1/11/2021	
2021-094 Investigate Water in Secondary Containment, Bldg. 9478	CIV20-047	Main Post	BE I.A2	1/12/2021	
2021-095 Install Tent for Command Post Event, Bldg. 9478	TEN21-005	Main Post	BE I.B1	1/14/2021	
2021-096 Garcia Gym Renovations, Bldg. 1856	MWR20-024	Main Post	BE I.A2	1/14/2021	Proposed work includes: replace the flooring in the main entry, lobby, hallways, break room, basketball court, cardio/yoga rooms, laundry room, staff offices, closets, restrooms, and manager's office; repaint the gym; upgrade lighting as necessary; consolidate any unused wiring/conduits in the gym; clean ductwork and roofing structures; add power drops for exercise equipment; and add water bottle fillers.
2021-097 Install Concrete Benches, Fire Pit, Grill, and Hang TV Inside Recreation Area, Bldg. 2156	1BD21-002	Main Post	BE I.A2	1/21/2021	
2021-099 Install Splash Pad, Bldg. 1231	MWR21-006	Main Post	BE I.A2	1/25/2021	Proposed work includes: remove portions of the existing flooring to accommodate additional piping; place new piping for fixtures; mount play fixtures; re-establish flooring; and convert baby pools into a splash pad.
2021-102 Install "Your Speed" Radar Signs, Fort Carson	DIR21-002	Main Post	BE I.A1	1/29/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-105 Power Upgrade to Arms Rooms, Bldg. 1360	RES19-005	Main Post	BE I.A2	1/29/2021	Proposed work includes: install 4 two gang electrical outlet (power runs) in preparation for transformation to SIPR café and COMSEC vault; supply HVAC; address duct work in Bay 3 & 4; install locks on access doors; and update doors.
2021-107 Complete Erosion Repairs, Bldg. 4356	MWR20-005	Main Post	BE I.B3	2/4/2021	Proposed work includes: re-establish irrigation system throughout the playground; establish bluegrass sod in the playground at an elevation required to mitigate potential tripping hazards between the sodded areas and the existing sidewalks and playgrounds; and graded to drain.
2021-108 Construct Second Gate Entrance to Bronco Yard, Fort Carson	DPW21-002	Main Post	BE I.A1 BE I.B2	2/4/2021	Proposed work includes: install temporary and permanent erosion control measures; perform initial and fine grading within the ditch line to facilitate installation of culvert; install culvert within existing ditch; and construct an access road leading from Bennett Street and the nearby unpaved tank trail into the storage yard.
2021-112 Install Grounding Rods behind the Motor Pool Generators, Bldg. 8142	4SB21-003	Main Post	BE I.A1	2/4/2021	Proposed work includes: install grounding rods behind 15 generators, ranging in size from 3 to 30k, and placed six feet into the ground.
2021-114 Install Access Control Card Readers & Keypad, Bldg. 7506	SFG21-005	Main Post	BE I.A2	2/10/2021	

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2021-115 & 2021-183 Fiber-to-Home Project	n/a	Main Post	BE I.A1	2/16/2021 4/8/2021	<p>2021-115 is the initial site review, while 2021-183 is a review of the project details.</p> <p>The project is proposed to improve the quality of communications to residential areas around Fort Carson. It will require extensive trenching and boring along the roads and through some open areas.</p> <p>Proposed work includes: the installation of new high-speed fiber digital services and a system generator; the installation will be a combination of direct boring, vibratory plowing and hand digging.</p>
2021-116 Repair Broken Seating, Bldg. 1505	GAR19-015	Main Post	BE I.A2	2/10/2021	
2021-117 Repair Siding on Building 10013 at Turkey Creek Ranch	SO 1129050	Turkey Creek Complex	BE I.D1g	2/18/2021	Proposed work includes: replace 3 square feet of siding with fiber cement siding shingle to match the existing size, profile, and color.
2021-119 Install Additional Heating, Ventilation, and Air Conditioning (HVAC) System in Server Room, Bldg. 7400	SFG21-006	Main Post	BE I.A2	2/18/2021	
2021-120 Repair 2 nd and 3 rd Floor, Bldg. 1217	DPW20-055	Main Post	BE I.A2	2/18/2021	Proposed work includes: repair 2nd floor west end hallway carpet and 3rd floor central and east wing carpet; refresh paint, flooring, ceiling grid, and other finishes; refresh restrooms/showers by steam cleaning/deep-cleaning finishes and fixtures; repair any damaged fixtures and HVAC equipment; remove any temporary walls, un-serviceable personal property, and un-needed information technical (IT)/audio-visual

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					(AV) systems; install outlets and NIPR drops to meet standard office requirements; install window blinds; and re-key/core doors.
2021-121 Install Coaxial Cable, Bldg. 1117	MWR21-007	Main Post	BE I.A1 BE I.A2	2/18/2021	
2021-122 Replace Internal Doors, Bldg. 8000	CIV21-016	Main Post	BE I.A2	2/18/2021	
2021-123 Repair Connex Box Bunker, Bldg. 7790	MWR21-001	Main Post	BE I.A2	2/22/2021	Proposed work includes: remove the wall and container; and construct the end of the berm to the matching adjacent berms without the container and retaining wall.
2021-124 Colorado Army National Guard (COARNG) Centennial Training Center Expansion, Fort Carson	n/a	Main Post	BE I.A1	2/19/2021	2021-124 is the review of the draft Environmental Assessment for the COARNG Enclave Master Plan. Undertaking has been previously reviewed under NEPA Project No. 2019-362 & 2019-364.
2021-125 FY2021 Invasive Species Treatment, Fort Carson and PCMS	DPW21-021	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	BE I.B3 FC D2b PC A2b PC B4B2 PC C3b2 PC D3b2	2/25/2021	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.

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2021-126 Repair Door, Bldg. 10017, Turkey Creek Ranch	SO 1129033	Turkey Creek Complex	BE I.D1f BE I.D1h	2/24/2021	Proposed work includes: replace 2-inch-by4-inch area of damaged material around door; repair and repaint door jam to match to existing color and sheen; and rehang the door using existing hinges and fasteners.
2021-131 Install Temporary Storage Fenced Areas, Bldg. 9466/9487 and 9486/9487	2BD20-013	Main Post	BE I.A1 BE I.A2	2/25/2021	Proposed work includes: installing FE-6 perimeter fencing; and placing approximately 8 inches of gravel on both sides of the existing asphalt runway. 2021-131 involves only the fenced area at Bldg. 9486/9487, and is an updated NEPA review as it has been over 6 months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA Project No. 2020-288.
2021-132 Renovate Annex to Photo Studio, Bldg. 1118	DPT20-015	Main Post	BE I.A2	2/26/2021	Proposed work includes: renovate building to include 4 to 5 changing rooms, 3 20-feet-by-30-feet photography studio, 3 office spaces; a 15-person-occupancy meeting room; storage area for audio, video, and photography equipment; lobby and facilities for soldiers needing studio photography.
2021-133 Install Exit Signs, Bldg. 1012	DPW19-080	Main Post	BE I.A2	2/26/2021	Proposed work includes installing 6-inch illuminated exit signs for all first floor exits of the building.
2021-138 Remove Service Window, Bldg. 7464	SFG21-007	Main Post	BE I.A2	3/3/2021	Proposed work includes removing service window; installing metal stud and drywall; and finish and paint to match.

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2021-139 Repair or Replace Four Exterior Security Cameras, Bldgs. 1450, 1452, & 1453	TEN21-011	Main Post	BE I.A2	3/4/2021	
2021-141 Impound Lot and Fire Department Lot Fencing Project, Bldgs. 3660 & 3669	DIR17-012	Main Post	BE I.A1 BE I.A2	3/11/2021	Proposed work includes: replace damaged chain link security barbed wire fencing and divider security fencing between impound lot and Fire Department lot. 2021-141 is an updated NEPA review as it has been over 6 months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA Project No. 2017-224.
2021-142 Install 32 CAT6 Ports, Bldg. 8000	CIV21-017	Main Post	BE I.A2	3/11/2021	
2021-143 Road Repairs on Specker Ave., Fort Carson	DPW21-001	Main Post	BE I.A2	3/11/2021	Proposed work includes: mill, overlay, and replace striping on section of Specker Avenue; and install a dedicated turning lane from Specker to Magrath.
2021-146 Arbor Day Tree Planting, Bldg. 6205	DPW21-023	Main Post	BE I.B3	3/11/2021	
2021-148 Remove Hardware & Install Door Handle, Bldg. 1959	SPC21-008	Main Post	BE I.A2	3/12/2021	
2021-149 Combat Aviation Brigade (CAB) Fuel Vehicle Parking at BAAF	n/a	Main Post	BE I.A2	3/18/2021	The CAB has proposed staging fuel vehicles throughout the airfield to make refueling aircraft more efficient.

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2021-152 Repair Unpaved Areas around Exterior of Bldgs. 1392, 1551, 2705, 3192, 3292, 8213, & 8300	DPW20-066	Main Post	BE I.B2	3/18/2021	Proposed work includes: the use of barriers such as fencing or boulders to prevent unauthorized parking and stabilizing the disturbed areas to keep sediment on site.
2021-153 Install Bird Netting, Bldgs. 7411 & 7412	SFG20-009	Main Post	BE I.A2	3/18/2021	Proposed work includes: install anti-roosting measures, e.g. netting, on the underside of overhangs above the load out bays of Bldgs. 7411 & 7412; and install bird spikes on front, second deck patio cover for each building.
2021-154 Install an Unisex Bathroom, Bldg. 1203	2BD21-005	Main Post	BE I.A2	3/18/2021	
2021-156 Replace Carpet, Bldg. 9638	DPT16-013	Main Post	BE I.A2	3/18/2021	2021-156 is an updated NEPA review as it has been over 6 months since last review and project has not been initiated. Undertaking has been previously reviewed under NEPA Project No. 2016-267.
2021-157 Replace Carpet, Bldg. 3669	DIR19-012	Main Post	BE I.A2	3/18/2021	
2021-158 Replace Carpet in Room 1110 & 2 nd Floor Hallway, Bldg. 1550	DIR18-013	Main Post	BE I.A2	3/18/2021	
2021-159 4th CAB Secret Internet Protocol Router (SIPR) Network Expansion, Bldg. 9648	4ID20-002	Main Post	BE I.A2	3/22/2021	Proposed work includes drilling holes on the 3 rd story side of the building. Between rooms, a core drill is required to extend trunk connections from Room 153 to Rooms 277 and 327 on west side and from Room 195 to Room 234 on east side.
2021-163 Replace Carpet, Bldg. 1130	MED20-012	Main Post	BE I.A2	3/24/2021	

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2021-164 Renovate South Entrance, Bldg. 1225	DPW21-012	Main Post	BE I.A2	3/24/2021	Proposed work includes replacing the existing exterior and interior door with automatic, sliding glass doors; and adding housing signage and awning to the entrance exterior.
2021-166 Repair Exterior, Bldg. 1361	DPW18-046	Main Post	BE I.A2	3/26/2021	Proposed work includes installing new exterior panels to overlay current panels with anodized aluminum to match the building colors.
2021-168 Install Planter Boxes with Drip Irrigation System, Bldg. 600	CIV21-028	Main Post	BE I.B3	3/30/2021	
2021-170 Demolish Bldgs. 1516 & 1518	DPW21-010	Main Post	BE I.A3	3/30/2021	
2021-171 Demolish Bldg. 210	DPW20-064	Main Post	BE I.A3	3/30/2021	
2021-172 Demolish Bldgs. 213 & 214	DPW20-065	Main Post	BE I.A3	3/30/2021	
2021-173 Remove Service Window, Bldg. 7412	SFG21-008	Main Post	BE I.A2	3/31/2021	Proposed work includes removing service window; installing metal stud and drywall; and finish and paint to match.
2021-174 Renovate Bldg. 1510 to Create Dental Clinic	CIV21-019	Main Post	BE I.A2	3/31/2021	Proposed work includes installing new wall, floor, ceiling finishes, and lighting in a portion of the existing furniture store; make modifications to the existing mechanical, electrical, and plumbing systems as required for dental care provider usage; and constructing a new customer entrance and a new exterior door for emergency egress.
2021-175 Install Two 8'x10'x8' Open Ceiling Examination Rooms, Bldg. 1203	2BD21-007	Main Post	BE I.A2		

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2021-179 & 2021-228 Pavement Failure Taxiway Charlie, BAAF	BAA21-010	Main Post	BE I.A2 BE I.B2	4/7/2021 6/8/2021	2021-179 is the review for sending a camera into the storm sewer pipe to determine if there is a blockage or damage to the pipe. 2021-228 is the review to repair the sinkhole
2021-187 Intrusion Detection System (IDS) Installation, Bldg. 9620	4ID21-003	Main Post	BE I.A2	4/19/2021	Proposed work includes the installation of one 110-volt, 20-amp dedicated outlet to install the IDS system for the Communications Security Room in Bldg. 9620 to meet the requirement for open storage.
2021-188 Install Shore Power Upgrade Stations, Bldg. 1959	SPC21-007	Main Post	BE I.A2	4/19/2021	
2021-189 Install Cooktop Units in Barracks, Bldg. 2151	GAR21-012	Main Post	BE I.A2	4/20/2021	
2021-190 Install Coaxial Cable, Bldg. 6270	CIV21-031	Main Post	BE I.A1 BE I.A2	4/22/2021	
2021-191 Upgrade CCTV and Access Control (ACS System), 10 th Special Forces Group (SFG) Compound	SFG21-011	Main Post	BE I.A2	4/22/2021	Proposed work includes upgrading current ACS/CCTV system to a digital system to make it compatible with future military construction requirements while ensuring that legacy buildings abide by necessary physical security requirements, in addition to supporting further growth and security on the 10 th SFG compound.
2021-193 Renovate Central Loafing Shed, Turkey Creek Ranch	GAR21-008	Turkey Creek Complex	BE I.D4a	4/28/2021	The loafing shed is a non-contributing feature of the Turkey Creek Ranch Historic District (5EP836). Proposed work includes repainting the exterior and interior of the shed and replacing the roof. The interior will be painted brown, and the exterior will be painted white with brown trim. The current gray-

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					colored shingles will be replaced with a brown-colored shingle. Color scheme of proposed work is in accordance with the Turkey Creek Ranch Historic District Design Guidelines.
2021-196 Remove Existing Door Hinges and Install New Self-Closing Door Hinges on All Common Doors, Bldg. 7412	SFG21-010	Main Post	BE I.A2	4/29/2021	
2021-198 Crack Seal Parking Lots, Fort Carson	DPW20-081	Main Post	BE I.A2	4/30/2021	
2021-199 Interior Renovations, Bldg. 1524	DPW21-028	Main Post	BE I.A2	4/30/2021	2021-199 is the 50% design review. Undertaking has been previously reviewed under NEPA Project No. 2020-283.
2021-200 Kitchen Renovations, Bldgs. 6058 & 6060	MWR21-011	Main Post	BE I.A2	5/3/2021	
2021-204 Install Instrument Landing System at Butts Army Airfield	BAA21-013	Main Post	BE I.A1	5/12/2021	Proposed work includes excavating, trenching, and foundations for installation of Instrument Landing System (ILS) glide slope equipment shelter, ILS glide slope antenna, ILS localizer equipment shelter, DME antenna, and ILS localizer antenna.
2021-205 Foundation Settlement Repair at Bldg. 7413 (Indoor Baffle Range)	SFG18-010 SFG20-003	Main Post	BE I.A2	5/7/2021	SFG20-003 is a continuation of SFG18-010 to correct additional damage to Bldg. 7431 associated with foundation settlement. 2021-205 is the 35% design review. Undertaking has been previously reviewed under NEPA Project No. 2018-223, 2019-063, & 2019-165.

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2021-207 Convert MOD B of Bldg. 2158 into Consolidated Shower Facility	1BD20-014	Main Post	BE I.A2	5/13/2021	
2021-208 Paint Bldg. 2259	1BD21-003	Main Post	BE I.A2	5/18/2021	
2021-209 Complete Drainage Repairs/Modifications in Creek near Bldg. 8030	SO 1147529	Main Post	BE I.B2	5/19/2021	Proposed work includes adding riprap at bridge/culvert ends; adding cement grout as needed; remove small trees and brush in ditch line; fill in areas of excessive erosion; and clean up sediment build up in drainage to restore proper flow.
2021-210 Complete Drainage Repairs/Modifications in Creek near Harr Street and Prussman Boulevard	SO 1145908	Main Post	BE I.B2	5/19/2021	Proposed work includes adding riprap at bridge/culvert ends; adding cement grout as needed; remove small trees and brush in ditch line; fill in areas of excessive erosion; and clean up sediment build up in drainage to restore proper flow.
2021-213 Pave Pathway between Bldgs. 6204 & 6204	MWR21-010	Main Post	BE I.A1	5/26/2021	
2021-215 Fort Carson Energy Resilience Project	n/a	Main Post	BE I.A1	5/26/2021	2021-215 is the review of the preliminary draft Environmental Assessment. The proposed action is the installation of new power generation technology and supporting infrastructure within the cantonment area of Fort Carson in the form of Aeroderivative Combustion Turbines or a similar power block package.
2021-216 Repave Patriot Elementary, Bldg. 6205	CIV21-041	Main Post	BE I.A1 BE I.A2	6/1/2021	Proposed work includes re-asphalting; and installing new curb and gutter for the entire playground and parking lot areas.

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2021-217 Repair Running Track at Carson Middle School, Bldg. 6200	CIV21-040	Main Post	BE I.A2	6/1/2021	
2021-218 Repair and Install CCTV Camera, Bldgs. 7493 & 7494	MED21-005	Main Post	BE I.A2	6/1/2021	
2021-219 Demolish Short Concrete Wall in Bay, Bldg. 8200	CIV21-034	Main Post	BE I.A2	6/2/2021	
2021-220 Demolish Bldg. 209A	DPW20-063	Main Post	BE I.A3	6/2/2021	
2021-221 Replace HVAC System Communication in Room 105, Bldg. 1453	TEN21-009	Main Post	BE I.A2	6/2/2021	
2021-222 Install ICIDS, Bldg. 1014	TEN21-012	Main Post	BE I.A2	6/2/2021	
2021-223 Freedom Fest at Iron Horse Park, Fort Carson	GAR21-020	Main Post	BE I.B1	6/4/2021	
2021-224 Replace Door Handles, Bldgs. 9648 & 9668	4ID21-008	Main Post	BE I.A2	6/4/2021	
2021-225 Lactation Room, Bldg. 8152	4ID21-006	Main Post	BE I.A2	6/4/2021	
2021-227 Construct Flow Battery System, Fort Carson	DPW21-032	Main Post	BE I.A1 BE I.A2	6/9/2021	
2021-229 Repair Fencing in Riding Arena, Turkey Creek Ranch	GAR21-018	Turkey Creek Complex	BE I.D1a	6/7/2021	Proposed work includes replacing the wood rail fencing around the riding arena near Bldg. 10017 in-kind (same materials, same design, same color).
2021-231 Repair and Replace Vacuums Conduit, Bldg. 1070	MWR21-012	Main Post	BE I.A2	6/9/2021	

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2021-232 Repair Broken Door, Bldg. 10000	SO 1138840	Turkey Creek Complex	BE I.D1d BE I.D1h	6/17/2021	Proposed work includes repairing or replacing the broken south exterior door sidelight of the Penrose House. The glass will be repaired or replaced with the original or in-kind material, size, design, and color.
2021-233 Repair Tank Trail B, Fort Carson	DPW21-030	Main Post	BE I.A2	6/17/2021	
2021-235 Construct Public/Private (PPV) Solar Array south of BAAF	DPW16-027	Main Post	BE I.A1	6/22/2021	2021-235 is a review of the installation of up to an additional 7MW of solar at the consolidated PPV Solar Array site south of BAAF. Undertaking has been previously reviewed under NEPA Project No. 2016-162, 2016-220, 2016-485, & 2018-334.
2021-236 Replace Roof, Bldg. 2060	DPW21-008	Main Post	BE I.A2	6/28/2021	
2021-242 Roof Repairs, Bldgs. 6058 & 6060	MWR20-020	Main Post	BE I.A2	6/30/2021	
2021-245 Relocate 15 Tricon Cargo Containers to Bldg. 1360 for Deployment	4ID21-012	Main Post	BE I.A2	7/6/2021	
2021-247 Replace Roof, Bldg. 9550	DPT19-026	Main Post	BE I.A2	7/8/2021	
2021-249 Replace Door & Door Handle, Room B216, Bldg. 2132	3BD21-003	Main Post	BE I.A2	7/14/2021	
2021-250 Reimage Fuel Canopy & Fuel Pumps, Bldg. 9478	CIV21-053	Main Post	BE I.A2	7/16/2021	
2021-251 Reimage Fuel Canopy & Fuel Pumps, Bldg. 900	CIV21-054	Main Post	BE I.A2	7/16/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-252 Brand Graphics for the Fuel Canopy, Bldg. 3600	CIV21-052	Main Post	BE I.A2	7/16/2021	
2021-254 Complete Extensive Renovation on Bldgs. 2077, 2157, 2350, & 2792	1BD21-004	Main Post	BE I.A2	7/16/2021	<p>Bldg. 2077 & 2157: Proposed work includes: new paint throughout all rooms; replace ceiling tiles; install energy-efficient exterior doors; replace tiles/linoleum throughout building; and apply epoxy/sealant on concrete floors.</p> <p>Bldg. 2350: Proposed work includes: new paint throughout all rooms; new carpet in command suite and conference room; replace tile in bathrooms; replace existing urinals with water-saving urinals; replace sinks in bathrooms; replace ceiling tiles; install energy-efficient exterior doors; install new doors in command suite; remove loft in Room 1055; replace tiles/linoleum throughout building; remove faux wood paneling in Room 116; soundproof office walls; and replace light switches in all offices.</p> <p>Bldg. 2792: Proposed work includes: new paint throughout all rooms; replace ceiling tiles; install energy-efficient exterior doors; apply epoxy/sealant on concrete floors; add ceilings to 1st floor offices; install spray insulation; install new locks on all doors; install tile in upstairs cages; paint exterior of building; and ceiling addition to offices. In addition, in the bathrooms of Bldg. 2792, the following work to be done includes: new paint, new tile floors, new sinks; new water-saving urinals; new stalls, and new toilets.</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
2021-255 Reimage Fuel Canopy & Fuel Pumps, Bldg. 510	CIV21-055	Main Post	BE I.A2	7/19/2021	
2021-261 Install Shade Structure, Bldg. 6070	CIV21-046	Main Post	BE I.A1	7/26/2021	
2021-263 Stationing Action: Restructure of the U.S. Army Criminal Investigation Command, Fort Carson	SMB21-070	n/a	BE I.A1 BE I.A2	7/27/2021	<p>This action will result in the net gain of 1 military personnel and 15 civilian personnel.</p> <p>This is a review of force structure realignment. This realignment will require new construction in the future with short-term placement into existing buildings. It is proposed to remodel Bldg. 1518 to accommodate this realignment. Additional NEPA review will be required once plans/designs are detailed enough to determine the appropriate level of NEPA documentation.</p>
2021-265 Reconfigure Polygraph/Observation Rooms, Bldg. 1816	TEN21-016	Main Post	BE I.A2	7/28/2021	
2021-266 Bolt Shelves to Floor, Bldgs. 9374, 9379, 9381, 9391, & 9415	CIV21-056	Main Post	BE I.A2	7/29/2021	
2021-267 & 2021-278 Post Signs on DIVARTY Overhang, Bldg. 1351	4ID21-013	Main Post	BE I.A2	7/29/2021 8/26/2021	
2021-271 Install Wiring in Bldg. 9667, Fort Carson	4ID21-010	Main Post	BE I.A2	8/19/2021	<p>Proposed work includes: reinforcing all windows and doors with metal mesh; installation of cypher locks to all exterior doors and both interior lobby doors; soundproofing three rooms; installation of a fence around the building; and installation of a mechanical entry/exit door to the parking lot.</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
2021-272 Tent Installation for Event, Bldg. 9092	TEN21-020	Main Post	BE I.B1	8/23/2021	
2021-274 Renovate Bldg. 2649 to U.S. Army Criminal Investigation Division's Security Guidelines	TEN21-017	Main Post	BE I.A1 BE I.A2	8/26/2021	
2021-275 Repair Walls of Commanding General's Office, Bldg. 1435	4ID21-016	Main Post	BE I.A2	8/26/2021	
2021-276 Install Garden or Flowerbeds, Bldg. 7493	MED21-008	Main Post	BE I.B3	8/26/2021	
2021-279 Install AC/DC Power and Grounding in Communication Nodes, Fort Carson & PCMS	DIR21-008	Main Post Downrange Fort Carson PCMS Cantonment	BE I.A2 FC D1b PC A2b	8/31/2021	The Installation Campus Area Network Modernization (ICANMOD) project is an Army directed mandate to replace and upgrade all legacy wired network infrastructure with new equipment in Fort Carson and PCMS. The AC/DC electrical, grounding, and Trimm Panel installation will occur in Bldgs. 319, 1014, 1550, 2358, 2435, 6256, 7500, 8008, 9535, & 9545 at Fort Carson and Bldg. 310 at PCMS.
2021-280 Demo Bldgs. 210, 213, 214, 1516, & 1518	DPW21-057	Main Post	BE I.A3	9/2/2021	
2021-281 Dig Permit for the Excavation of a L Trench for Fire Department Training, Range 11, Fort Carson	DIR21-010	Main Post	BE I.C3	9/2/2021	Proposed work includes excavating a 20 feet long by 4 feet wide by 9 feet deep L-shaped trench inside of the concrete training yard located south of the tank trail and Specker Ave. and west of Bldg. 3710.
2021-285 Construct Fence Inside of Weikel Elementary School Playground, Bldg. 6070	CIV21-057	Main Post	BE I.A1	9/8/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-286 Repair Parking Lot, Bldg. 1550	DPW21-046	Main Post	BE I.A2	9/9/2021	
2021-287 Fiber Placement for Expanded Service, Bldg. 7450	MWR21-015	Main Post	BE I.A1 BE I.A2	9/14/2021	
2021-288 Install HVAC Emergency Shutoff Switches, Bldg. 1519	DPW21-060	Main Post	BE I.A2	9/14/2021	
2021-289 Remove Service Window & Replace Drywall, Bldg. 7412	SFG21-022	Main Post	BE I.A2	9/14/2021	
2021-290 Install Vehicle Charging Stationing, Bldgs. 9100 & 9102	CIV21-058	Main Post	BE I.A1 BE I.A2	9/22/2021	
2021-291 Stormwater Clean Up Event, Fort Carson	n/a	Main Post	BE I.B3	9/22/2021	
2021-293 Main Exchange Parking Lot, Bldg. 6110	DPW21-043	Main Post	BE I.A2	9/23/2021	
2021-295 Install Outlets, Bldgs. 1444 & 2330	CIV21-030	Main Post	BE I.A2	9/23/2021	
2021-296 Install Crosswalk Flashers, Bldg. 7500	MED15-005	Main Post	BE I.A2	9/28/2021	Undertaking was previously reviewed under NEPA Project No. 2015-270.
2021-300 Convert to Central Kitchen for Mobile Food Trucks, Bldg. 1851	CIV21-044	Main Post	BE I.A2	9/30/2021	Proposed work includes converting to central kitchen for mobile food trucks; cover vinyl composite tile flooring; install new vinyl flooring; demolish pony wall or glass block wall in barbershop; cap water subs; rough in and finish electrical; install captive air hood, dry wall, and FRP as required; paint; and set up appliances in food prep area.
2021-301 Secure Open-Storage Room Conversion, Bldg. 1351	4ID21-005	Main Post	BE I.A2	9/30/2021	

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
2021-007 Haymes Dam Repair	DPW20-056	Haymes Reservoir	10/14/2020	HC #78926 12/15/2020	No historic properties affected. A response was also received from Pawnee Nation of Oklahoma; they concurred with the finding of effect.
2021-018 Unplug Water Line to Womack Reservoir, Fort Carson	DPW20-088	Main Post	10/18/2020	HC#75411 1/9/2019	No adverse effect to historic properties Section 106 consultation was completed in January 2019 (NEPA Project No. 2019-038) for the use of jet propulsion to unclog line.
2021-053 & 2021-106 Repair Bridge Safety Features Post-wide, Fort Carson	DPW21-006	Main Post Downrange Fort Carson	11/18/2020 2/5/2021	HC #79108 2/5/2021	Twenty-four bridges and culverts require repairs or upgrades to meet safety requirements. Four 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 Comanche Nation of Oklahoma, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effect. See also Enclosure 1, Table 2 of the Fort Carson Downrange PA Annual Report.

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
2021-068 Install Bird Netting in Haynes Pavilion, Fort Carson	DPW21-015	Haymes Reservoir	12/8/2020	HC #79113 2/5/2021	No historic properties affected A response was also received from the Eastern Shoshone Tribe; they concurred with the finding of effect.
2021-074 Prairie Dog Control at Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	12/14/2020	HC #76234 7/16/2019	No adverse effects to historic properties Section 106 consultation for the area in Turkey Creek Complex was completed in August 2019 as part NEPA Project No. 2019-168.
2021-136 & 2021-246 Construction, Operation, and Maintenance of a Recreational Vehicle Park, Camp Falcon	MWR13-029 PN 82101	Camp Falcon	3/2/2021 7/7/2021	HC #76220 8/2/2019	No adverse effects to historic properties Section 106 consultation was completed in November 2019. 2021-136 is the 35% design review, and 2021-246 is the 65% design review. Undertaking has been previously reviewed under NEPA Project No. 2019-243 & 2020-104.
2021-147 Adjustments to the Instrument Flight Rule (IFR) Approaches for BAAF	n/a	Butts Army Airfield	3/19/2021	CHS #60144 10/14/2011	No adverse effects to historic properties Section 106 consultation was completed in August 2011 as part of Project No. CF2011-011.

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
2021-162 Forest Treatment, Camp Falcon & Training Area 5, Fort Carson	DPW21-025	Main Post Camp Falcon	3/23/2021	HC #79606 5/19/2021	No adverse effects to historic properties A response was also received from Pawnee Nation of Oklahoma; they concurred with the finding of effects. Portions of the project were previously reviewed and consulted on as part of NEPA Project No. 2019-379 (HC #76752, 12/18/2019).
2021-181 3rd PLT, Alpha Company, 52nd BEB Excavation Training Request, TA Bravo, Fort Carson – Project Cancelled	2BD21-009	Main Post	4/8/2021	n/a	Project was cancelled prior to initiation of Section 106 consultation.
2021-182 Construction and Maintenance of Amphibian Pitfall Traps, Fort Carson	DPW20-053 DPW20-057	Main Post Downrange Fort Carson	4/13/2021	HC #77985 6/18/2020	No historic properties affected. Section 106 consultation was completed in June of 2020 (NEPA Project No. 2020-143 & 2020-158). 2021-182 is an updated review of the project as it had been over 6 months since last reviewed and project had not been initiated.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
CF2021-007 Turkey Creek Ranch Historic District Repairs, Fort Carson	n/a	Turkey Creek Complex	6/23/2021	n/a	<p>The Fort Carson Mounted Color Guard has submitted several work requests in order to make the facilities at Turkey Creek Ranch safer for the equine and personnel. Proposed projects include the removal of three silos, deconstruction of two latrines, demolish the play structure, installation of two loafing sheds, demolition of one loafing shed, removal of the burned remains of a loafing shed, replacement of post-and-wire fencing with metal pipe fencing, cleaning out of Jacobs Ditch, repair of trusses within Bldg. 10017 (Riding Stable), and site improvements to prevent flooding on west side of Bldg. 10017 (Riding Stable).</p> <p>Section 106 consultation has not been initiated.</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
2021-006 Review of the Programmatic Environmental Assessment (PEA) for the Fielding of the Maneuver Short Range Air Defense (M-SHORAD) System	n/a	n/a	108/2020	This is a review of the preliminary draft PEA to analyze the environmental and socioeconomic impacts with the fielding of the new M-SHORAD system. Fort Carson is one of the installations proposed to receive this new system. If Fort Carson is chosen, the required construction and training needs associated with the M-SHORAD system will be further analyzed.
2021-011 & 2021-044 Review of the Programmatic Environmental Assessment (PEA) for the Armored Multi-Purpose Vehicle (AMPV), Fort Carson	n/a	n/a	10/22/2020 11/6/2020	2021-011 and 2021-044 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. Undertaking has been previously reviewed under NEPA Project No. 2020-299.
2021-014 Stationing Action: Activation of the 40 th Forward Resuscitative and Surgical Team	SMB21-005	Main Post	10/26/2020	There will be a net increase of 20 military personnel. This is a review of force structure realignment. These realignment affect personnel numbers only, and do not require additional building space. No potential to affect historic properties

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2021-087 Stationing Action: Stationing of 918th Contracting Support Battalion, Fort Carson	n/a	Main Post	1/11/2021	There will be a net decrease of four military personnel. This is a review of force structure realignment. These realignment affect personnel numbers only, and do not require additional building space. No potential to affect historic properties
2021-128 Environmental Survey for Termination of Lease – USO, Bldg. 1218	n/a	Main Post	2/25/2021	Document Review
2021-129 Equipment Cleaning in Preparation for Deployment, Fort Carson	n/a	Main Post	2/25/2021	No potential to affect historic properties
2021-134 Recommendations for Updates to Fort Carson Regulation 190-5, Motor Vehicle Traffic Supervision, Section 3-21 Parking Lots, Fort Carson	n/a	n/a	3/4/2021	Document Review
2021-161 Real Property Master Plan NEPA Compliance Checklist	n/a	n/a	3/22/2021	Document Review
2021-167 Stationing Action: Relocation of Company C, Signal, 90th Aviation Support Battalion, Fort Carson	SMB21-029	Main Post	3/26/2021	This action will result in a net gain of five military personnel and two civilian personnel. This is a review of relocation of two Army Reserve Aviation Command units from Fort Rucker, AL, to Fort Carson. This relocation affect personnel numbers only, and do not require additional building space. No potential to affect historic properties
2021-185 Command Post Computing Environment Increment Operational Assessment, Fort Carson	n/a	Main Post	4/13/2021	Document Review
2021-197 & 2021-268 Balfour Beatty Environmental Management Plan Review	n/a	Main Post	4/29/2021 8/2/2021	Document Review Undertaking has been previously reviewed under NEPA Project No. 2020-045 & 2020-255.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2021-201 Environmental Survey for Termination of License – Red Cross, Bldg. 1217	n/a	Main Post	5/3/2021	Document Review
2021-206 Review of Updates to Stormwater Pollution Prevention Plan	n/a	n/a	5/10/2021	Document Review
2021-212 Integrity Test the 10 Above Ground Storage Tanks, Bldg. 1860	DPW21-020	Main Post	5/26/2021	No potential to affect historic properties
2021-226 Stationing Action: Stationing of U.S. Army Counterintelligence Command Units to Fort Carson	SMB21-042	n/a	6/2/2021	This action results in the net gain of seven military personnel and one civilian personnel. This is a review of force structure realignment. These realignment affect personnel numbers only, and do not require additional building space. No potential to affect historic properties
2021-234 Stationing Action: Communications-Electronics Command Realignment	SBM21-057	n/a	6/22/2021	This action results in the net loss of one civilian personnel. This is a review of force structure realignment. These realignment affect personnel numbers only, and do not require additional building space. No potential to affect historic properties
2021-248 Multi-Domain Task Force (MDTF) Stationing	n/a	n/a	7/14/2021	This is a request from Army Materiel Command Headquarters for Fort Carson-specific information to assist in the environmental and socioeconomic analyses and drafting of the PEA for the MDTF Stationing.
2021-257 Electronic Warfare Planning and Management Tool Testing	n/a	n/a	7/21/2021	This is a test of the Electronic Warfare Planning and Management Tool software application. No potential to affect historic properties.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2021-292 Stationing Action: Stationing of Marines Corps Forces Space Command, Fort Carson	SMB21-079	Main Post	9/21/2021	<p>This action results in the net gain of 19 military personnel.</p> <p>This is a review of force structure realignment. These realignment affect personnel numbers only, and do not require additional building space.</p> <p>No potential to affect historic properties</p>
2021-297 Environmental Protection Officer (EPO) Refresher Training Slide Review	n/a	n/a	9/28/2021	Document Review

ENCLOSURE 2:
USAG FORT CARSON'S RESPONSE TO SHPO'S COMMENTS ON FY20 ANNUAL REPORT



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

Re: Fiscal Year (FY) 2020 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 correspondence dated November 13, 2020 and received by our office on November 16, 2020 regarding review of the Fiscal Year 2020 (FY 20) 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 (DRFC), Attachment 3—Pinon Canyon (PCMS)]. Below, we describe a few general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Similar to our comments on the FY 2018 and 2019 annual reports, our first general comment concerns the training exercises conducted by USAG Fort Carson. Our previous comments noted that military use of the landscape has the potential to adversely affect historic properties. While we agreed with the minimization efforts implemented, we requested that USAG Fort Carson initiate consultation with our office on mitigating adverse effects. In your December 2019 and October 2020 responses, you acknowledged that the trainings were causing adverse effects and that the Programmatic Agreements (PAs) require consultation to resolve those effects according to 36 CFR 800.6. Your responses, however, also noted that USAG Fort Carson only considers adverse effects on a “case-by-case basis” and that you “do not agree to an overarching approach to mitigation.”

While we appreciate the acknowledgement of the need to resolve adverse effects and recent attempts to mitigate adverse effects, we continue to argue that military use of the landscape has the potential to adversely affect historic properties. The development of resource strategies that seek to mitigate effects to types or groupings of resources would comprise an important and effective approach to mitigating some of these potential adverse effects. The cumulative scale and extent of impacts caused by the training exercises will result in the loss of a significant opportunity to study the relationship and association of these resources on a



larger scale. Further, resources such as traditional cultural properties may be considered on a broader scale than an individual feature or archaeological site. The relationship between these various resources is important to understanding the area's past and the cultural landscape may comprise an important aspect of a resource's significance. Without the development of an effective resource strategy, important information may be lost due to cumulative effects of these exercises and not all of the adverse effects may be appropriately mitigated. We request that consultations regarding resolution of adverse effects continue and that USAG Fort Carson continues its commitment to resolve adverse effects.

We also continue to argue 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 effectively reducing the frequency of inadvertent entries. Thirty nine sites were entered in 2010, 22 sites were entered in 2013, 48 sites were entered in 2015, 45 sites were entered in 2017, and 65 sites entered during 2018. While we appreciate the additional information provided in your 2019 and 2020 correspondences and are encouraged to hear about potential successes and that the Cultural Resources Program staff have had increased interactions and integration into military exercises, we note that resources continue to experience inadvertent entries. An example consists of 5PE.2966 that experienced six inadvertent entries, one of which occurred in 2019.

Your December 2019 correspondence notes that feedback is sought regarding the training materials and that you "regularly review the training materials and methods of dissemination to achieve maximum results." The correspondence, however, does not discuss how this is conducted. A quantifiable analysis of the effectiveness of the training would help in determining gaps in the training program. This should include quantitative data and could include an analysis of the training retention rate between different levels of personnel. A study could also determine the reach of different training formats. Further, we request information on the type of training provided for different levels of personnel. We continue to note from our FY 19 response that training emphasized for both high and low ranking personnel that incorporates varying methods and formats as well as information oriented to different groups will help ensure the efficacy of the program. Training and resources oriented towards the variety of different military exercises will also help ensure the effectiveness of the program.

We understand that additional minimization and avoidance measures are being employed including the use of Siebert markers. We continue to support the use of Siebert markers and other measures. We, however, also recommend studying the effectiveness of the measures employed. Using 5PE.2966 as an example, inadvertent entries occurred at the site despite the presence of markers that surround the site. We recommend studying how these measures fail and determining potential improvements or additional measures to avoid and minimize inadvertent entries.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Matthew Marques, Section 106 Compliance Manager, at (303) 866-4678 or matthew.marques@state.co.us, Mitch Schaefer, Section 106 Compliance Manager, at (303) 866-2673 or mitch.schaefer@state.co.us, or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



Attachment 1:

SHPO Comments on FY 2020 Fort Carson Built Environment PA Annual Report (HC# 58731)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

As a minor point of clarification, the 2019-379 Forest Thinning, Camp Falcon and Training Area 5 was reviewed under HC#76914 (not 76752). Nevertheless, our office did concur the undertaking would result in no historic properties affected in a letter dated December 18, 2019.

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. Dispute Resolution

No comments.



Attachment 2:

SHPO Comments on FY 2020 Down Range Fort Carson PA Annual Report (HC# 63877)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2019-134, 2019-163, 2020-088, 2020-249, and 2020-294: Our office looks forward to consultation on these undertakings.

III. Action Updates

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

I.C: We appreciate the development of draft research designs to evaluate the eligibility of resources determined as “needs data” and the opportunity to review the designs. We, however, note that additional research is needed for additional archaeological sites. In particular, we note that research is needed for the Turkey Creek Rock Art Historic District.

As stated in our response to the FY 19 annual report, 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.

Your October 2020 letter responded to our comments that you will collaborate with tribes in the near future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We agree with these recommendations and look forward to further consultation regarding the district and any potential traditional cultural properties.

III.E: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources, sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.



VI.B: We note that earlier this year we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. Has this been developed or will this be developed by the contractor? We look forward to reviewing the scope of work and the results of this study.

B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson's October 2020 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.

What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be aware of and take responsibility to comply with regulations and laws to protect cultural resources. Quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

C. Inadvertent Entries and/or Impacts to Historic Properties

We appreciate USAG Fort Carson's efforts to document inadvertent entries and cumulative effects to historic properties. We, however, note that the exercises continue to inadvertently enter historic properties and recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

D. Inadvertent Discoveries

No comments.

E. Emergency Response

No comments.

F. Amendment

No comments.

G. Dispute Resolution

No comments.

H. Other

We look forward to the development of a memorandum of agreement to resolve adverse effects to 5PE.2966.



**Attachment 3:
SHPO Comments on FY 2020 PCMS PA Annual Report (HC# 65747)**

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2019-285: We look forward to consulting on this undertaking.

2020-299: Will the new vehicles cause different impacts or increase the scale of impacts to historic properties? Will training, resources, minimization measures, and avoidance measures need to be altered to address the use of the new vehicle?

III. Action Updates

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

I.B: As stated in our response to the FY 19 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 correspondence, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

We appreciate the development of draft research designs and the opportunity to review the designs. We look forward to reviewing the results of the fieldwork. We also look forward to reviewing the results of your Hogback study.

III.A: We recommend analyzing the effectiveness of the proposed avoidance and minimization measures. Please refer to our letter for additional detail.

III.D: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

B. Cultural Resource Awareness Training

Please refer to our comments in our letter regarding trainings.

C. Brigade Training Exercises

Please refer to our comments in our letter regarding trainings and resources provided to personnel as well as comments regarding avoidance and minimization measures.



D. Inadvertent Entries and/or Impacts to Historic Properties

We look forward to reviewing the documentation concerning the Bent Canyon Wildland Fire and inadvertent entries at 5LA.4750, 5LA.6108, and 5LA.13436. We also 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. Dispute Resolution

No comments.

I. Other.

We look forward to consultation regarding the resolution of adverse effects.



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

January 8, 2021

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

Dear Mr. Turner:

Thank you for your correspondence dated December 16, 2020, concerning your review of the fiscal year (FY) 2020 annual reports for the three U.S. Army Garrison (USAG) Fort Carson 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.

Fort Carson has been an active duty Army installation since 1942, and has been its current size since 1965. It has always been home to armored and infantry brigades, and is now home to Stryker and Combat Aviation brigades as well. Training occurs daily at Fort Carson; this includes mounted and dismounted maneuvers, aviation training, excavation training, and live-fire training. Due to this high operation tempo and the types of training involved, we did consult with your office and the Advisory Council on Historic Preservation (ACHP) during the development of the *Programmatic Agreement on Military Training and Operational Support Activities at Down Range Fort Carson* (Fort Carson Downrange PA) on an "overarching approach to mitigation" for the resolution of potential adverse effects to historic properties. The Fort Carson Cultural Resources Manager (CRM) also consulted with the Directorate of Plans, Training, Mobilization, and Security (DPTMS) to determine which areas within downrange Fort Carson are used heavily for training and better understand what types of training occur in them. As a result, this PA included language to implement mitigation measures to resolve potential adverse effects at 22 resources and unrecorded historic properties within areas exempted from cultural resources survey.

All signatories recognized upfront that inadvertent entry and/or other impacts may occur at historic properties, and consequently the Fort Carson Downrange PA included a very robust inspection and monitoring program. Since the inception of the program in 2014, inadvertent entries related to military training have been identified and documented at 8 of the 178 protected resources within the downrange area: 5EP161, 5EP1177, 5EP2524, 5EP5974, 5EP7602, 5PE793, 5PE2966, and 5PE8157. Site 5PE2966 has been entered three separate times (not six as stated in your letter) by

military tactical vehicles. Given the multiple entries, we determined cumulative adverse effects were occurring at this site.

Given that an overarching approach to mitigation was agreed upon by your office, the ACHP and USAG Ft Carson during the development and execution of the Fort Carson Downrange PA, and considering the high operational tempo of military training downrange and low number of protected resources entered since protection measures and cultural resources awareness training have been implemented, and considering also, that only 2 of the 178 downrange protected resources have been adversely affected as a result of these recent entries, we do not agree additional broad scale mitigation is necessary to mitigate potential direct, indirect, and cumulative adverse effects related to military use of downrange. As stated in our October 2020 letter, we will continue to consult on a case-by-case basis when potential adverse effects to historic properties at Fort Carson are identified.

As also stated in our October 2020 letter, USAG Fort Carson does 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. We have been actively working to develop mitigation plans for 36 historic properties at PCMS that were adversely affected or were entered during multiple exercises, as discussed during past annual programmatic agreement meetings with your office and consulting/interested parties. It is expected these mitigation plans will help inform our decision on the best strategy to employ. Based on that, we will be ready to discuss various types of mitigation with your office, Native American Tribes, and other consulting/interested parties in the near future as we continue consultation to resolve for adverse effects. We can share at this point that we are looking at strategies that seek to mitigate effects to the largest number of resources perhaps by types or groupings.

Please be informed that we agree with your statement that traditional cultural properties should be considered on a broader scale and not just at the individual feature or site level. This is one of the reasons a traditional use study of the Hogback is being completed. Also, we regularly consult with culturally affiliated Native American Tribes to identify, interpret, and evaluate these types of resources.

On a related matter, we would like to reiterate, as explained in our December 2019 letter, our opinion is one should not use quantitative data alone to assess the effectiveness of our cultural resources awareness training program. We continue to feel that comparing different brigade training exercises to arrive at conclusions on the program effectiveness is flawed and should not be used to judge it. We remain hopeful that you will review again the information in that letter to arrive at the same conclusion.

We firmly believe that what speaks to the success of the cultural resource awareness training is the open communication and cooperative planning lines established with the 4th Infantry Division leadership, as well as with other key Garrison

organizations like DPTMS. 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. Cultural Resources Program staff continually work with the 4ID's geospatial staff to update and ensure protected resources are always included on paper and digital maps used by units during training. (Enclosure 4 includes examples of the cultural resources awareness training and other materials created by USAG Fort Carson). Furthermore, each directorate, brigade, battalion, company, and contractor have designated Environmental Protection Officers (EPOs). This individual is the point-of-contact for environmental matters and the primary contact for fulfilling the unit's environmental responsibilities. EPOs also advise the Commander or Director about significant environmental aspects and impacts, and serve as liaisons between the unit and the Environmental Division. Newly designated EPOs must take a 40-hour certification course, which includes cultural resources awareness training. At the end of the course, the EPOs are tested and certified. EPOs also take an 8-hour refresher course annually.

For your situational awareness, the Department of Army has developed an organization (Training and Doctrine Command Culture Center), which is responsible for developing and delivering cultural resources awareness training to all Army leaders, including 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, 719-744-6640.

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

As a minor point of clarification, the 2019-379 Forest Thinning, Camp Falcon and Training Area 5 was reviewed under HC#76914 (not 76752). Nevertheless, our office did concur with the undertaking would result in no historic properties affected in a letter dated December 18, 2019.

USAG Response: The subject line on your letter stated the undertaking was reviewed under HC #76752 (see Figure 1). We will update our files if this is indeed the incorrect project review number. Thank you.

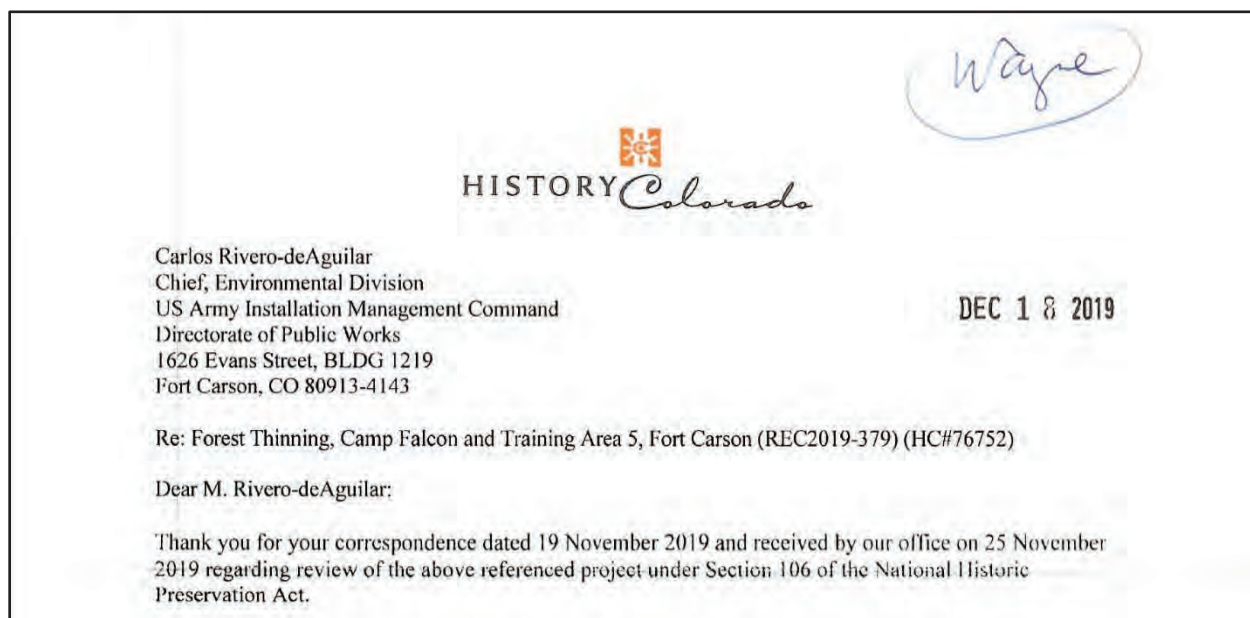


Figure 1. Note subject line states 2019-379 Forest Thinning, Camp Falcon and Training Area 5, Fort Carson was reviewed under HC #76752 (not HC #76914).

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.

USAG Response: 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, 2019-163, 2020-088, 2020-249, and 2020-294: Our office looks forward to consultation on these undertakings.

USAG Response: Thank you for your comment. Below is an update to the consultation status for these undertakings:

- 2019-134: Section 106 consultation has not been initiated.
- 2019-163: Section 106 consultation has been completed for 2019-163 Installation of Three-Phase Electrical to Range 123. The SHPO concurred with the finding of “no adverse effects to historic properties” via correspondence dated December 1, 2020 (HC #75708).
- 2020-088 / 2020-294: Section 106 consultation will be initiated once the Cultural Resources Manager has received all requested information from the project proponent.
- 2020-249: Section 106 consultation will be initiated once the Cultural Resources Manager has received all requested information from the project proponent.

III. Action Updates

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

I.C: We appreciate the development of draft research designs to evaluate the eligibility of resources determined as “needs data” and the opportunity to review the designs. We, however, note that additional research is needed for additional archaeological sites. In particular we note that research is needed for the Turkey Creek Rock Art Historic District.

As stated in our response to the FY 19 annual report, USAG 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.

Your October 2020 letter responded to our comments that you will collaborate with tribes in the near future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We agree with these recommendations and look forward to further consultation regarding the district and any potential traditional cultural properties.

USAG Response: Thank you for your comment. We look forward to working with you on this project.

III.E: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources, sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

USAG Response: This comment has been addressed in the body of the letter.

VI.B: We note that earlier this year we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. Has this been developed or will this be developed by the contractor? We look forward to reviewing the scope of work and the results of this study.

USAG Response: Once the finalized scope of work for the Historic Mining Context Study has been completed, you will have an opportunity to review and comment it. The tasks outlined in the draft scope that you reviewed have not changed.

B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson’s October 2020 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.

What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be aware of and take responsibility to comply with regulations and laws to protect cultural resources. Quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

USAG Response: 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 and cumulative effects to historic properties. We, however, note that the exercises continue to inadvertently enter historic properties and recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

USAG Response: 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.

H. Other

We look forward to the development of a memorandum of agreement to resolve adverse effects to 5PE.2966.

USAG Response: Thank you for your comment. We also look forward to working with you and other consulting parties in the development of a memorandum of agreement to resolve adverse effects at this site.

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

2019-285: We look forward to consulting on this undertaking.

USAG Response: Thank you for your comment.

2020-299: Will the new vehicles cause different impacts or increase the scale of impacts to historic properties? Will training, resources, minimization measures, and avoidance measures need to be altered to address the use of the new vehicle?

USAG Response: The new vehicle operates doctrinally the same as the vehicle it will replace. There will be no change to the type or scale of impacts to historic properties. Training, minimization measures, and avoidance measures will not need to be altered to address the use of the new vehicle.

III. Action Updates

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

I.B: As stated in our response to the FY 19 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 correspondence, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

USAG Response: 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.

We appreciate the development of draft research designs and the opportunity to review the designs. We look forward to reviewing the results of the fieldwork. We also look forward to reviewing the results of your Hogback study.

USAG Response: Thank you for your comment.

III.A: We recommend analyzing the effectiveness of the proposed avoidance and minimization measures. Please refer to our letter for additional detail.

USAG Response: This comment has been addressed in the body of the letter.

III.D: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

USAG Response: This comment has been addressed in the body of the letter.

B. Cultural Resource Awareness Training

Please refer to our comments in our letter regarding trainings.

USAG Response: This comment has been addressed in the body of the letter.

C. Brigade Training Exercises

Please refer to our comments in our letter regarding trainings and resources provided to personnel as well as comments regarding avoidance and minimization measures.

USAG Response: This comment has been addressed in the body of the letter.

D. Inadvertent Entries and/or Impacts to Historic Properties

We look forward to reviewing the documentation concerning the Bent Canyon Wildland Fire and inadvertent entries at 5LA.4750, 5LA.6108, and 5LA.13436. We also look forward to continued consultation to resolve the effects of previous training exercises.

USAG Response: Thank you for your comment. As a status update, all known protected resources within the Bent Canyon Wildland Fire footprint have been inspected, and site documentation has been updated. Once the site documentation has been reviewed, it will be forwarded to your office. Approximately 134 acres have been surveyed and 12 newly identified sites recorded. A technical report of investigations

and all associated documentation will be forwarded to your office when the survey has been completed.

The PCMS Archaeologist is currently verifying the site marking contractor's work. All inadvertent entries will be documented (to include 5LA4750, 5LA6108, and 5LA13436) and an after action report submitted.

E. Inadvertent Discoveries

No comments.

F. Emergency Response

No comments.

G. Amendment

No comments.

H. Dispute Resolution

No comments.

I. Other

We look forward to consultation regarding the resolution of adverse effects.

USAG Response: Thank you for your comment. We also look forward to working with you to resolve adverse effects that have resulted from these past brigade exercises.

Enclosure 4:
Examples of Cultural Resources Awareness Training Materials



Cultural Resources Management

WHAT YOU NEED TO KNOW AS AN ENVIRONMENTAL PROTECTION OFFICER

Course Objectives

You will learn:

1. What are cultural resources?
2. Why is it important to protect cultural resources?
3. What are the legal requirements?
4. What are your responsibilities?
5. Where can you learn more?



Fort Carson Cultural Resources Management Program

Mission:

"To support military training requirements, achieve regulatory compliance, and ensure stewardship responsibilities are met."



Goals:

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

8/23/2017

FORT CARSON EPO COURSE

3

Fort Carson Cultural Resources Management Program

Objectives:

- Provide accurate data regarding access restrictions
- Monitor cultural resources for impacts
- Implement protective measures
- Implement conservation measures
- Integrate cultural resources management with Installation operations
- Consult with external stakeholders
- Sustain public outreach



Tribal representatives discuss the importance of a rock art panel.

8/23/2017

FORT CARSON EPO COURSE

4

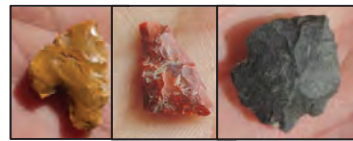
What are Cultural Resources?

Definition:

Non-renewable remnants of past human activities that have cultural or historical value and meaning to a group of people or a society

Or simply:

The stuff we leave behind



Cultural resources can be thousands of years old, hundreds of years old, or from the more recent past.

8/23/2017

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5

Cultural Resources Examples:



- Rock art, i.e. petroglyphs (carvings) and pictographs (paintings)
- Archaeological sites
- Historical buildings, structures, and objects
- Historical roads and trails
- Sacred sites and traditional cultural properties
- Human burials
- Artifacts
- Ruins



8/23/2017

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6

Fort Carson's Cultural Resources

Fort Carson (as of August 2017):

- 2,385 Cultural Resources
- 1 Listed National Register District
- 133 Eligible
- 68 Needs Data
- 2,165 Not Eligible
- 18 No Official Determination



PCMS (as of August 2017):

- 6,248 Cultural Resources
- 573 Eligible
- 660 Needs Data
- 4,999 Not Eligible
- 16 No Official Determination



Complex and Simple Habitation Sites
 Temporary Field Camps
 Stone Artifact Scatters/Quarry Locations
 Food Procurement/Processing Sites
 Rock Art Panels (Prehistoric & Historic)
 Historic Ranches/Farmsteads
 Military Construction (1942-Present)
 Stage Station/Mail Route Remnants
 Small Mining Operations

8/23/2017

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7

Why is it Important to Protect Cultural Resources?

- They provide information regarding **our** heritage, **our** practices, and **our** beliefs.
 - Contributes to **our** sense of place and identity
- These areas may have profound religious and spiritual significance to Native American tribes and other ethnic groups.
- Sacred Native American sites are rooted in the history of their people and maintain the continuity of traditional beliefs and practices.
- By preserving, protecting, and respecting cultural resources, you ensure these resources are available for future generations
 - Non-renewable resource – **once destroyed, can never be restored**
- It is **our** duty, as the land manager to be good stewards, ensuring compliance with all environmental and cultural laws and regulations.

8/23/2017

FORT CARSON EPO COURSE

8

Another Reason for Protecting Cultural Resources...

BECAUSE IT'S THE LAW!

National Historic Preservation Act (NHPA)

Archaeological Resources Protection Act (ARPA)

Native American Graves Protection and Repatriation Act (NAGPRA)

American Antiquities Act of 1906

American Indian Religious Freedom Act

Army Regulation 200-1

And more...

And some of these laws, such as the Archaeological Resources Protection Act, carry criminal and civil penalties.

8/23/2017

FORT CARSON EPO COURSE

9

Section 106 of the National Historic Preservation Act (NHPA)

- Section 106 of the NHPA requires us to consider the effects of our actions on historic properties.
 - Historic properties are any cultural resource that is listed in or is eligible for inclusion in the National Register of Historic Places (NRHP)
 - NRHP – list of cultural resources determined to be significant to the national, state, regional, or local history
- How **You** Can Comply with Section 106:
- Follow the Standard Operating Procedures (SOPs) in the Integrated Cultural Resources Management Plan (ICRMP)
 - SOP No. 1: Section 106 Compliance for Project Proponents
 - SOP No. 2: Mission Training of Military and Tenant Personnel
 - SOP No. 3: Emergency Operations

8/23/2017

FORT CARSON EPO COURSE

10

What Happens When We Do Not Comply with NHPA Section 106?

- Colorado State Historic Preservation Officer contacts the Advisory Council on Historic Preservation (ACHP)
- ACHP contacts the Secretary of the Army
- Garrison Commander must answer to the Secretary of the Army on why we foreclosed on the consultation process
- Then, it falls to **YOU** to answer why
- Lawsuits can be filed by Tribes, other interested parties, and the public
 - Comanche Nation v. United States
 - Pueblo of Sandia v. United States
 - National Trust for Historic Preservation v. Department of State
 - City of Grapevine v. Department of Transportation
 - Paulina Lake Historic Cabin Owners Association v. U.S. Forest Service

8/23/2017

FORT CARSON EPO COURSE

11

Scenario 1: Comanche Nation vs. United States

- Fort Sill proposed to constructed a 43,000 sq ft Training Support Center (TSC) warehouse (\$7.3 million) 1,662 ft southwest of the southern boundary of the Medicine Bluffs National Historic Feature
- Medicine Bluffs is a sacred site/TCP that is listed in the NRHP
- Fort Sill sent the draft final Environmental Assessment in Sep 2006
- Section 106 consultation letters mailed in Aug 2007
 - Comanche Nation requested more information and voiced concerns in correspondence dated Aug 2007, Oct 2007, Feb 2008, May 2008, & July 2008
- Construction of TSC began Aug 2008
- Comanche Nation filed a lawsuit in 15 Aug 2008
- Construction of TSC at new location in Oct 2009

8/23/2017

FORT CARSON EPO COURSE

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Scenario 1: Comanche Nation vs. United States

Comanche Nation asserted Fort Sill:

- Violated the Religious Freedom Restoration Act – building the TSC warehouse at the proposed location would interfere with the exercise of the Tribe's religious beliefs
- Violated the NHPA – Fort Sill failed to make a “reasonable and good faith effort” to consult to identify and resolve adverse effects

Outcome

- Project stopped and moved to another location
- \$650,000 lost on project costs and unknown \$\$\$ spent on legal costs
- Case is a precedent

8/23/2017

FORT CARSON EPO COURSE

13

Archaeological Resources Protection Act

- Knowingly damaging an archaeological resource is a violation of the Archaeological Resources Protection Act (ARPA)
 - Includes looting, digging within a site, graffiti or other defacement, removing cultural features, etc.
- ARPA carries up to **\$100,000 fine** and **1 year in jail** for 1st offense



8/23/2017

FORT CARSON EPO COURSE

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Scenario 2: Graffiti

- Sep 2013 – archaeologists observed graffiti at a sacred site/TCP at the PCMS
- Led to an Article 15-6 investigation
- Now used as an example of what not to do
- **Graffiti is not tolerated anywhere, any time**
- Defacing federal property is against the law
 - Destruction of Government Property (18 U.S.C §§ 1361-1363) – up to \$250,000 fine, 10 years imprisonment, or both
 - ARPA
- Anyone caught defacing government property (buildings, rock faces, etc) will be prosecuted



8/23/2017

FORT CARSON EPO COURSE

5

How Can You Help Protect and Preserve Cultural Resources?

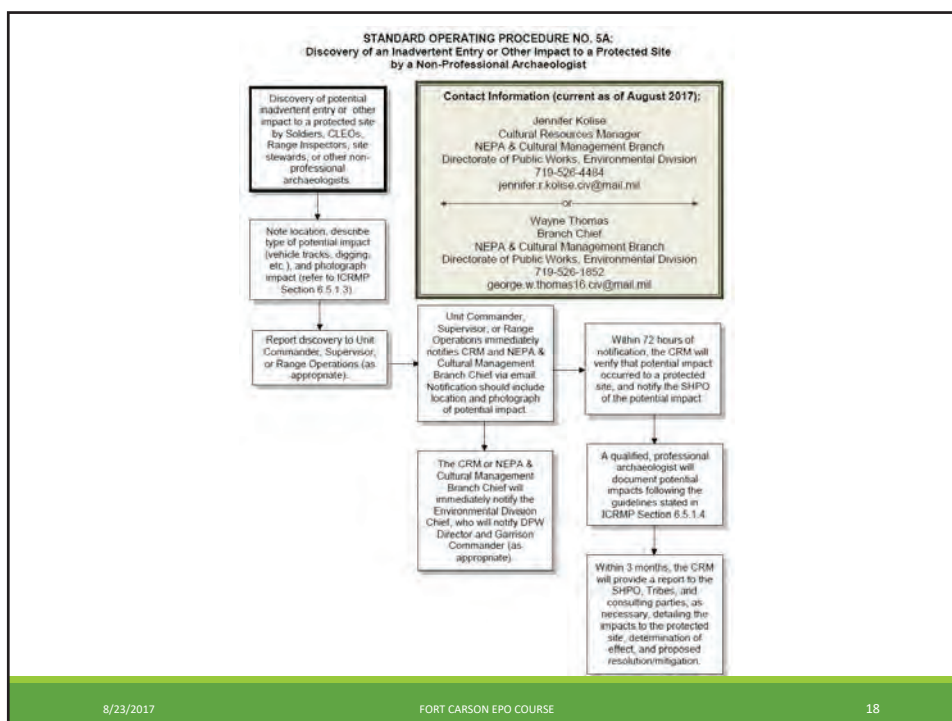
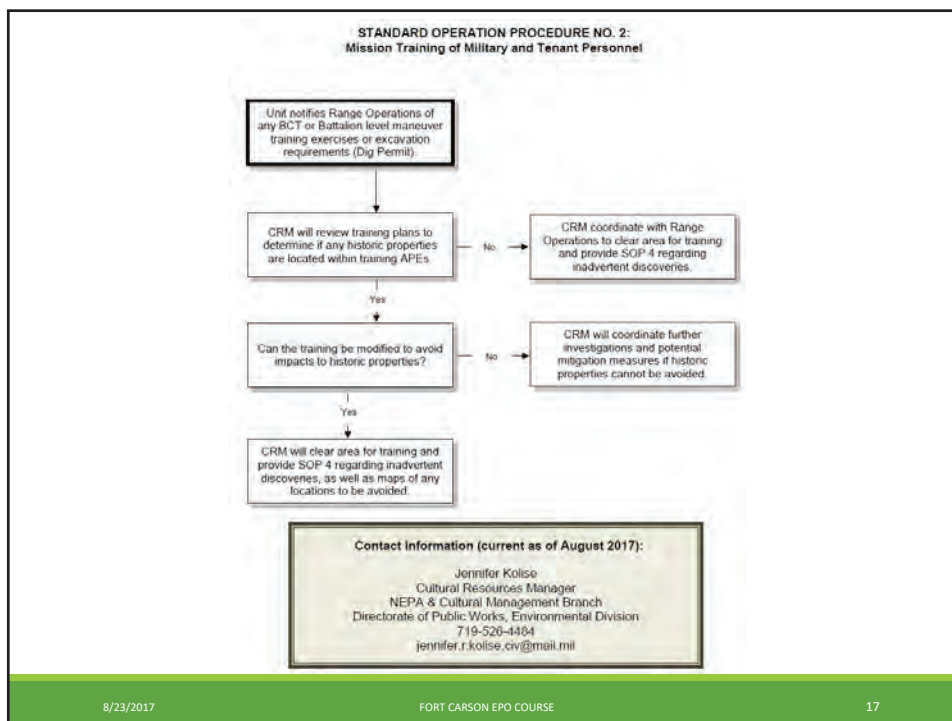
DO:

- Coordinate land use with Range Operations to ensure you are in an approved area.
 - **Especially excavation training (dig permit)**
 - Refer to ICRMP SOP No. 2
- Obey maneuver damage, environmental, and cultural resources protection policies and procedures.
- Observe posted signs, fencing, and Seibert marking indicating restricted areas that may be off-limits to vehicles, digging, bivouacking or other activities.
- Report any signs of looting, vandalism, or other damage to a cultural site to Range Operations and/or the Cultural Resources Manager (CRM).
 - Refer to ICRMP SOP No. 5A
- Stay vigilant!

8/23/2017

FORT CARSON EPO COURSE

16



How Can You Help Protect and Preserve Cultural Resources?

DON'T:

- Collect any artifacts, including arrowheads and bottles.
- Disturb stone circles, rock mounds, ruins, or other cultural features, including using stones from cultural features to create defensive positions or resting areas.
- Lean against, sit on, or step on rock mounds, rock walls, ruins, or other cultural features.
- Touch or deface rock art or historical structures.
- Trespass in historical structures.

8/23/2017

FORT CARSON EPO COURSE

19

If you find artifacts, bones, or other possible cultural items...

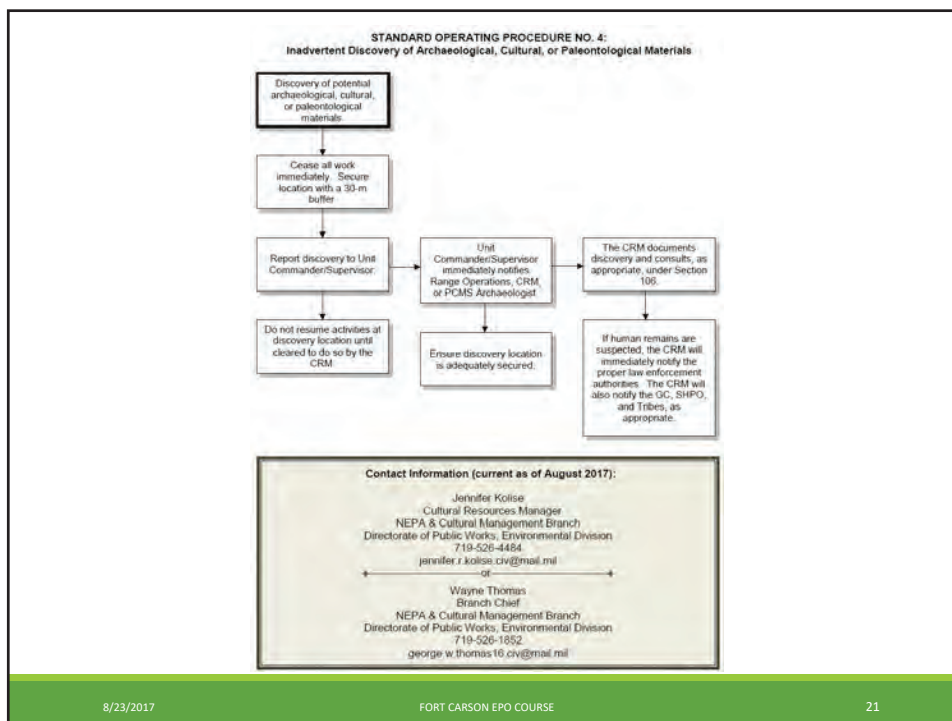
STOP WORK IMMEDIATELY

- Flag a protective buffer around the location of the discovery.
- Report the discovery to:
 - Fort Carson Range Operations (719-526-5698) or PCMS Range Operations (719-503-6120); and/or
 - Fort Carson CRM (719-526-4484) or PCMS Archaeologist (719-503-6136)
- You will be notified when you can proceed.

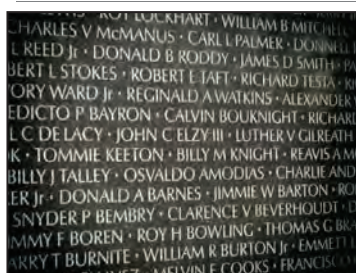
8/23/2017

FORT CARSON EPO COURSE

20



What is the Harm in Taking a Souvenir?

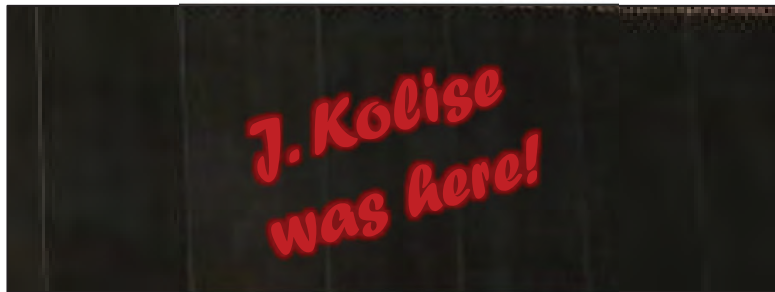


If every person who visited the Vietnam Memorial decided to take one name off as a souvenir, eventually there would be nothing left.

The same is true with archaeological sites. If everyone who visited a site took an arrowhead or bottle, eventually there would be nothing left that would give us information about the people who lived there. **OUR HERITAGE WOULD BE LOST!**



What's Wrong with this Picture?



Seriously...where's the harm in leaving your legacy somewhere?

8/23/2017

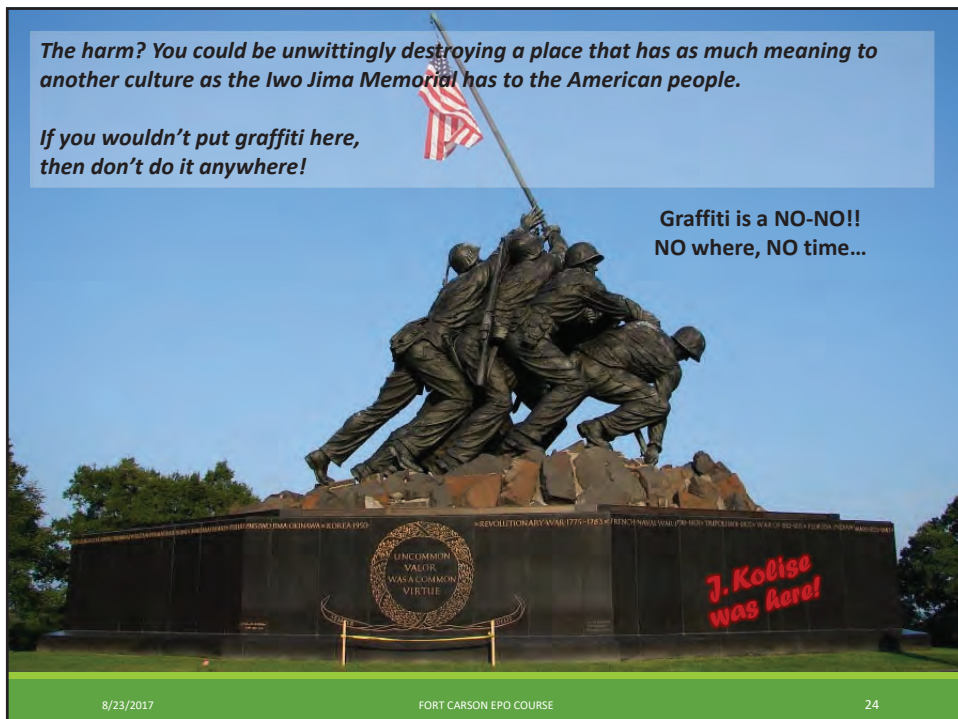
FORT CARSON EPO COURSE

23

The harm? You could be unwittingly destroying a place that has as much meaning to another culture as the Iwo Jima Memorial has to the American people.

If you wouldn't put graffiti here, then don't do it anywhere!

**Graffiti is a NO-NO!!
NO where, NO time...**

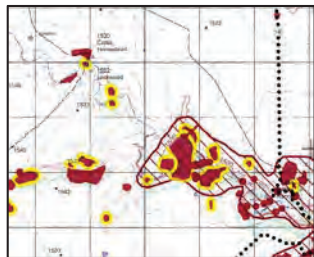


8/23/2017

FORT CARSON EPO COURSE

24

Site Protection Measures



Protected Resources JCR Map

Red = unmarked restricted area
 Red with yellow outline = marked restricted area
 Red hash-marked area = dismantled training only
 White line through restricted area = authorized travel corridor

No digging or mounted maneuvers within protected areas

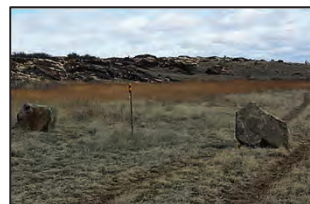


Seibert Marker

Red, yellow, and white 3M reflective tape
 Black stripe points to inside of restricted area.



Protection Fences with Restricted Access Signs



Seibert Markers and Boulders

8/23/2017

FORT CARSON EPO COURSE

25

Where Can You Learn More?

Integrated Cultural Resources Management Plan (ICRMP)

- Fort Carson-specific tool for the management of cultural resources
 - Outlines program obligations, goals, priorities, and SOPs
- Chapter 7 contains the SOPs relevant to your job
 - SOP No. 1: Section 106 Compliance for Project Proponents
 - SOP No. 2: Mission Training of Military and Tenant Personnel
 - SOP No. 3: Emergency Operations
 - SOP No. 4: Inadvertent Discovery of Archaeological, Cultural, or Paleontological Materials
 - SOP No. 5A: Discovery of an Inadvertent Entry or Other Impact to a Protected Site by a Non-Professional Archaeologist
- Where can it be found?
 - <https://www.carson.army.mil/organizations/dpw.html#three>

8/23/2017

FORT CARSON EPO COURSE

26

Main Points to Remember

- Cultural resources are non-renewable.
- Obey cultural resources laws and regulations
- Follow Fort Carson-specific guidance and SOPs outlined in the ICRMP
- No digging or mounted maneuvers within protected areas
- Use established travel corridors through protected areas
- Leave cultural resources as you found them
- Report any suspected looting, vandalism, site entries, etc., immediately to Range Operations and/or the CRM
- We are here to help you: 526-4484 (CRM) or 503-6136 (PCMS Archaeologist)

8/23/2017

FORT CARSON EPO COURSE

27

The Army is legally required to protect and manage cultural resources.

A. True

B. False

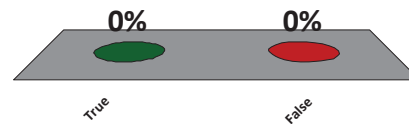
8/23/2017

FORT CARSON EPO COURSE

28

The Army is legally required to protect and manage cultural resources.

- A. True
- B. False



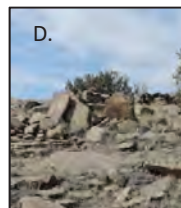
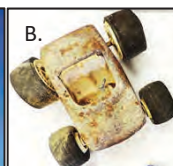
8/23/2017

FORT CARSON EPO COURSE

29

Which of the following would be considered a cultural resource?

- A. Trail
- B. Toy
- C. Building
- D. Rock formation
- E. B & C only
- F. C & D only
- G. All of the above
- H. None of the above



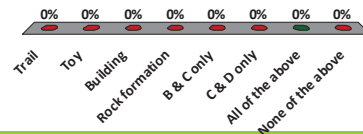
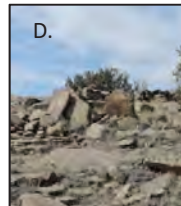
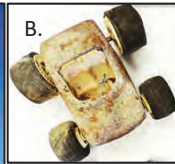
8/23/2017

FORT CARSON EPO COURSE

30

Which of the following would be considered a cultural resource?

- A. Trail
- B. Toy
- C. Building
- D. Rock formation
- E. B & C only
- F. C & D only
- G. All of the above
- H. None of the above



8/23/2017

FORT CARSON EPO COURSE

31

While digging a tank ditch, you find an arrowhead and other stone chips. What should you do first?

- A. Call Range Control or the CRM immediately.
- B. Cover it back up and say nothing.
- C. Put the arrowhead in your pocket. It would be a nice addition to your collection.
- D. Stop all work immediately, and place a buffer around the area.

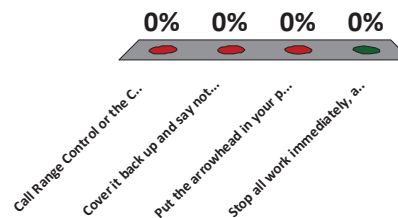
8/23/2017

FORT CARSON EPO COURSE

32

While digging a tank ditch, you find an arrowhead and other stone chips. What should you do first?

- A. Call Range Control or the CRM immediately.
- B. Cover it back up and say nothing.
- C. Put the arrowhead in your pocket. It would be a nice addition to your collection.
- D. Stop all work immediately, and place a buffer around the area.



8/23/2017

FORT CARSON EPO COURSE

33

You cannot be prosecuted for unknowingly defacing an archaeological site on an Army installation.

- A. True
- B. False

8/23/2017

FORT CARSON EPO COURSE

34

You cannot be prosecuted for unknowingly defacing an archaeological site on an Army installation.

- A. True
- B. False






CULTURAL RESOURCES

POTENTIAL HAZARDS AND ENVIRONMENTAL CONCERNS

Cultural resources are remnants of past human activities that have cultural or historical value and meaning to a group of people. A resource can be thousands of years old, hundreds of years old, or from the more recent past. Examples include: rock art and carvings; archaeological sites; historic buildings, structures or objects; historic roads and trails; Native American sacred sites and traditional cultural properties; human burials; artifacts; and ruins. As a land manager, it is our duty to be good stewards, ensuring compliance with all environmental and cultural requirements, laws, and regulations. Violation of cultural resources protection laws can result in civil and criminal penalties, monetary fines, and imprisonment.

HANDLING PROCEDURES

☆	Coordinate land use with Range Control Operations to ensure you are in an approved area.	 <p>Pictured above are various cultural resources that have been recorded on Fort Carson and PCMS.</p>
☆	Observe posted signs, fencing, and Seibert marking that indicate restricted areas which may be off-limits to vehicles, digging, bivouacking, or other high impact activities.	
☆	Do not collect artifacts, including arrowheads and bottles. Do not disturb stone circles, rock mounds, ruins, or other cultural features. Do not touch or deface rock art, or scratch on rocks or objects of any kind.	
☆	Do not trespass in historic structures even when not marked.	  <p>Graffiti, as seen in the photograph above, can irreparably harm the integrity of a site. There is no way to remove the graffiti without doing further damage to the site. The yellow, red, and white Seibert markers indicate areas where vehicles, digging, or bivouacking are not allowed.</p>
☆	Report any signs of looting, graffiti, or other damage to a cultural site to Range Control Operations or Cultural Resources staff.	
☆	No graffiti anywhere, anytime.	
☆	If buried artifacts, bones, or other cultural items are found, stop work immediately, flag a protective buffer around the location of the discovery, and report the discovery to Range Control Operations or Cultural Resources staff.	

GENERAL INFORMATION

For additional information concerning cultural resources, contact the Fort Carson Cultural Resources Manager at 526-4484 or the PCMS Archaeologist at 503-6136.

Range Control Operations: Fort Carson 526-5698 / PCMS 526-6123 or 6130

Reference: [Fort Carson Regulation 200-1](#).

Soldiers who have been designated to the Observer-Controller Team for a brigade exercise must go through special training. This brief covers environmental considerations, including cultural resources, and is usually provided by the Fort Carson Cultural Resources Manager. It is adapted for each specific brigade exercise.

1/11/2021

IRON STRIKE OC TEAM BRIEF

ENVIRONMENTAL CONSIDERATIONS

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



TOPICS

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



WHAT IS A PROTECTED RESOURCE?

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CULTURAL RESOURCE EXAMPLES



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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCE EXAMPLES

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CRITICAL INFRASTRUCTURE EXAMPLES

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



COMPLIANCE REQUIREMENTS FOR PROTECTED RESOURCES

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Best Practice:

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



PROTECTED RESOURCES MAP SYMBOLS: UNMARKED PROTECTED RESOURCE



Symbol:

Definition:

Caveats:

**Do not simply rely on the
observed Seibert markers and/or
fencing.**

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



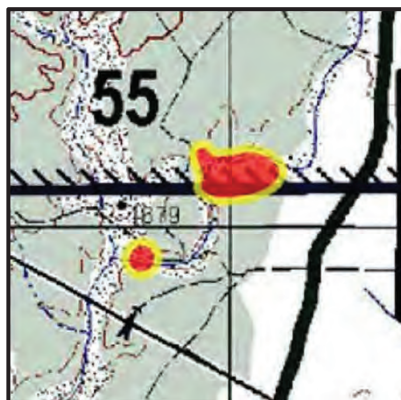
PROTECTED RESOURCES MAP SYMBOLS: MARKED PROTECTED RESOURCE

Symbol:

Definition:

Caveats:

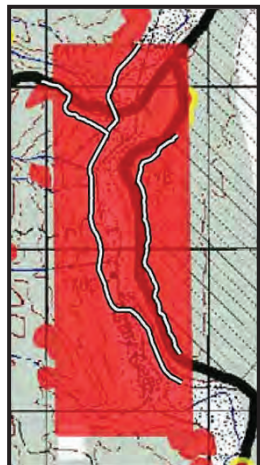
**Do not simply
rely on the observed Seibert
markers and/or fencing.**



Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



PROTECTED RESOURCES MAP SYMBOLS: AUTHORIZED TRAVEL CORRIDOR



Symbol:

Definition:

Caveat:

**Stay on the
approved, existing corridor only.**

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



PHYSICAL PROTECTION MEASURES



Seibert Marker



Protection Fences with Restricted Access Signs



Boulders

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INADVERTENT ENTRY / IMPACT

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCES GUIDANCE

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCES GUIDANCE

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCES GUIDANCE

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This tree was approximately 200 years old.
 This was avoidable.



Stock tanks provide drinking water for wildlife.

-

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CULTURAL RESOURCES GUIDANCE

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CULTURAL RESOURCES GUIDANCE

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**You will not WRITE, PRINT, PAINT, STAMP,
 SCRATCH, PECK, OR CHALK ON ANY STONE
 SURFACES, BUILDINGS / STRUCTURES
 (HISTORIC OR MODERN), OR LATRINE
 WALLS!!!!!!**

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



IF YOU FIND ARTIFACTS, BONES, OR OTHER POSSIBLE CULTURAL ITEMS...

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



SPILL RESPONSE

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil

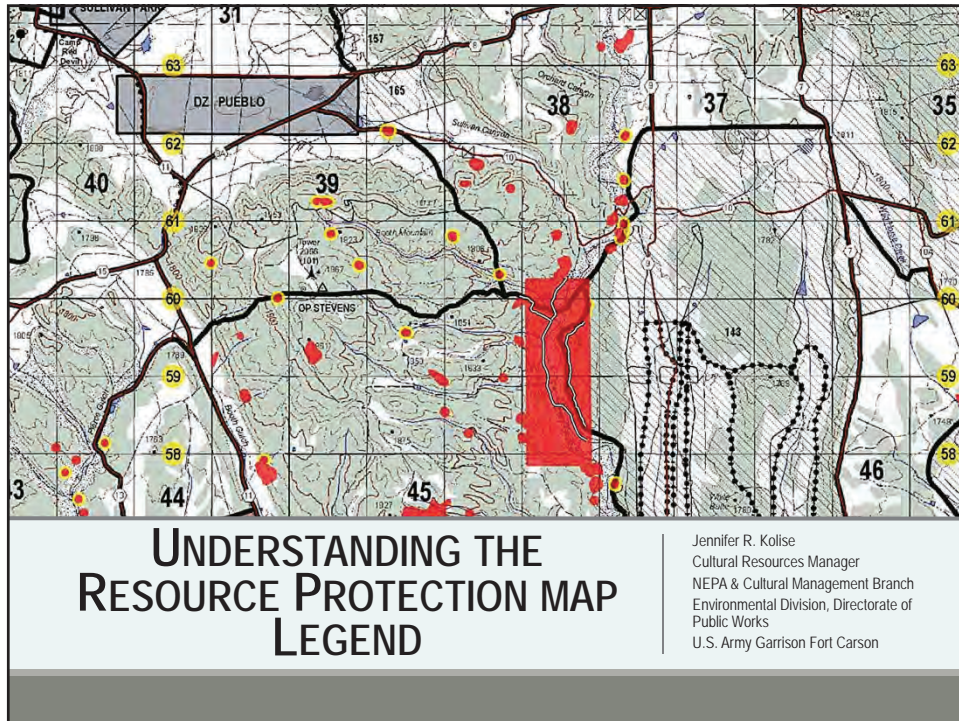


IRON STRIKE DIG REQUEST PROCESS

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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil





WHAT IS A PROTECTED RESOURCE?

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NATURAL RESOURCE EXAMPLES



CULTURAL RESOURCE EXAMPLES



CRITICAL INFRASTRUCTURE EXAMPLES

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HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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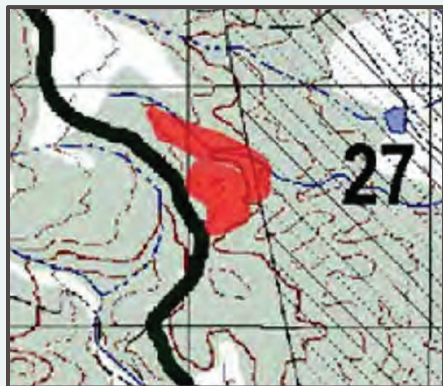


COMPLIANCE REQUIREMENTS

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Best Practice:

STANDARDIZED SYMBOL: UNMARKED RESOURCE



Symbol:

Definition:

Caveat:

**Do not simply
rely on the observed Seibert
markers and/or fencing.**

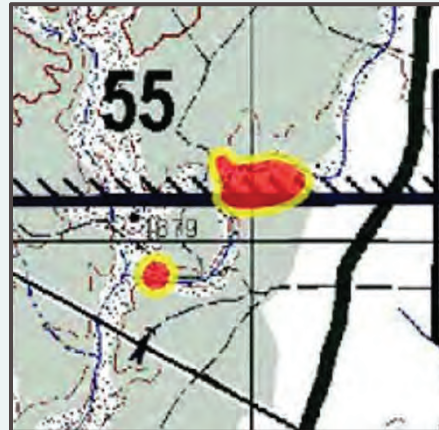
STANDARDIZED SYMBOL: MARKED RESOURCE

Symbol:

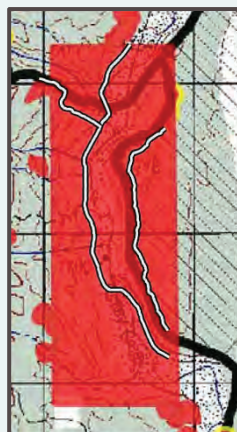
Definition:

Caveat:

Do not
simply rely on the observed
Seibert markers and/or
fencing.



STANDARDIZED SYMBOL: AUTHORIZED TRAVEL CORRIDOR THROUGH PROTECTED RESOURCE



Symbol:

Definition:

Caveat:

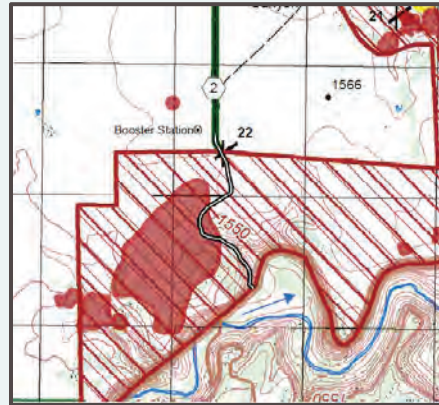
Stay on the
approved existing corridor
only.

STANDARDIZED SYMBOL: DISMOUNTED ONLY AREAS

Symbol:

Definition:

Caveat:



PHYSICAL PROTECTION MEASURES



Seibert Marker



Protection Fences with
Restricted Access Signs



Boulders

FISCAL YEAR (FY) 2021 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, 2021

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, 2020, through September 30, 2021, 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: <https://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. Fifty-two undertakings were reviewed that were considered exempted in accordance with Appendix 1 of the Fort Carson Downrange PA.

II. Non-Exempted Undertakings

Table 2 of Enclosure 1 lists all undertakings within the area of potential effects (APE) covered by the Fort Carson Downrange PA that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA). Six undertakings required Section 106 consultation during the reporting year. Section 106 consultation has been completed for five undertakings (2021-025, 2021-053/106, 2021-077, 2021-137, and 2021-241) and is in progress for one undertaking (2021-195).

The following is an update to the status of Section 106 consultation continuing from the fiscal year 2020 reporting period:

- 2019-134 Restore Natural Watershed in Support of Wildlife Conservation Efforts, Training Area 45, Fort Carson: Section 106 consultation was initiated in August of 2021. Via correspondence dated August 26, 2021 (HC #80254), the SHPO stated the provided site documentation did not provide adequate justification for why the newly identified features did not contribute to the site's eligibility. USAG Fort Carson is working with the SHPO to schedule a site visit to the APE, as well as updating the site documentation to include a new Management Document Form, which had not been submitted with the previous documentation.

Responses were also received from the Comanche Nation of Oklahoma, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma; all agreed with the finding of effect.

- 2020-088 & 2020-294 Construction, Operation, and Maintenance of an Ammunition Holding Area, TA 10, Fort Carson: Section 106 consultation was completed in June of 2021. The SHPO concurred with the finding of no adverse effects via correspondence dated June 3, 2021. Responses were also received from the Comanche Nation of Oklahoma and Pawnee Nation of Oklahoma; both agreed with the findings of effects.
- 2020-249 Construction, Operation, and Maintenance of Three Automated Infantry Squad Battle Courses (AISBCs): Section 106 consultation is required for the proposed AISBC in Training Area 25. Consultation will be initiated once more details on its location, routing of utilities, etc. are known.
- 2020-260 Install Three-Phase Electrical Power to Range 123, Fort Carson: See NEPA Project No. 2021-025 in Table 2 of Enclosure 1 for more information.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRM. Both are a review of Programmatic Environmental Assessments.

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: <https://www.carson.army.mil/organizations/dpw.html>
- Cultural Resources Awareness Video – available online at: <https://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 December 12, 2020 (HC #58731, HC #63877, and HC #65747), the SHPO requested USAG Fort Carson conduct a “quantifiable analysis of the effectiveness of the training” to help determine gaps in the training provided to Soldiers, Civilians, and other users. The SHPO also requested information on the types of training provided for different levels of personnel.

Enclosure 3 includes the SHPO’s December 12, 2020, letter, and the USAG Fort Carson’s response to the SHPO dated January 8, 2021.

C. Inadvertent Entries and/or Impacts to Historic Properties

The following summarizes any inadvertent entries and/or impacts to historic properties that occurred during the reporting period.

- CF2021-001 Wild Horse Wildland Fire: The wildland fire started on October 11, 2020, with fire suppression activities concluding on October 20, 2020. The fire was ignited by an aboveground electrical line owned by Black Forest Electric that is located on the west side of State Highway (SH) 115 outside of Fort Carson’s jurisdictional boundary. The fire burned 647.75 acres within the Turkey Creek Complex and Training Areas 17 and 18, while another 26.25 acres was burned on the west side of SH 115 where the fire originated.

Within the fire footprint were seven protected resources: 5EP142, 5EP143, 5EP144, 5EP145, 5EP5944, 5EP6153, and 5EP6170. No adverse effects resulting from the fire or fire suppression activities were noted during the after action inspection. The SHPO concurred with the finding of no adverse effects to historic properties via correspondence dated August 4, 2021 (HC #80125). Responses were also received from the Comanche Nation of Oklahoma, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all agreed with the finding of effect.

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. 2020-02875 (Wild Horse Wildland Fire): This wildland fire started on October 11, 2020, with fire suppression activities concluding on October 20, 2020. Approximately 647.75 acres were burned within the Turkey Creek Complex and Training Areas 17 and 18. Seven protected resources were within the fire’s footprint. Refer to Section III.C, 2021-001 for more information.
- Incident No. 2020-03145: This wildland fire, which was located on Range 127, started on November 6, 2020, with fire suppression activities ending on the same day.

- Incident No. 2020-03150: This wildland fire, which was located on Range 127, started on November 6, 2020, with fire suppression activities ending on the same day.
- Incident No. 2020-03199: This wildland fire, which was located on Range 127, started on November 12, 2020, with fire suppression activities ending on the same day.
- Incident No. 2020-03283: This wildland fire, which was located on Range 127, started on November 18, 2020, with fire suppression activities ending on the same day.
- Incident No. 2020-03285: This wildland fire, which was located on Range 127, started on November 19, 2020, with fire suppression activities ending on the same day.
- Incident No. 2020-03404: This wildland fire, which was located in the Large Artillery Impact Area near MP019, started on December 3, 2020, with fire suppression activities ending on the same day.
- Incident No. 2020-03463: This wildland fire, which was located on Range 135, started on December 8, 2020, with fire suppression activities ending on the same day.
- Incident No. 2021-00391: This wildland fire, which was located on Range 141, started on February 8, 2021, with fire suppression activities ending on the same day.
- Incident No. 2021-00620: This wildland fire, which was located on Range 127, started on February 23, 2021, with fire suppression activities ending on the same day.
- Incident No. 2021-00622: This wildland fire, which was located on Range 155, started on February 23, 2021, with fire suppression activities concluding on the same day.
- Incident No. 2021-00858: This wildland fire, which was located on Range 135, started on March 12, 2021, with fire suppression activities concluding on the same day.
- Incident No 2021-01612: This wildland fire, which was located in Training Area 24, started on May 14, 2021, with fire suppression activities concluding on the same day.
- Incident No. 2021-01625: This wildland fire, which was located along Route 11 near the northwest corner of Drop Zone Pueblo, started on May 15, 2021, with fire suppression activities concluding on the same day.

F. Amendment

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

On September 28, 2021, USAG Fort Carson notified the ACHP, SHPO, Tribes, and other consulting and interested parties of our intention to implement the Army Alternate Procedures (AAP), and requested point-of-contact information for those interested in collaborating with USAG Fort Carson in the development of a Historic Properties Component. Implementation of the AAP would supersede the Fort Carson Downrange PA. Treatment and mitigation requirements made in this PA will be effective and implemented until completed.

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 occurred due to cumulative effects associated with military training. 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. During the reporting year, no progress has been made toward the resolution of adverse effects at site 5PE2966.

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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Joe Wyka
Director, Public Works

ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY21 REPORTING PERIOD (OCTOBER 1, 2020, THROUGH SEPTEMBER 30, 2021) 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
2021-001 1-66 Armor Regiment (AR), 588 Brigade Engineer Battalion (BEB) Excavation Training Request, Range 155, Fort Carson	n/a	Downrange Fort Carson	FC C	10/6/2020	
2021-005 1-68 AR, 3 rd Armored Brigade Combat Team (3ABCT) Excavation Training Request, Training Areas (TAs) 41 & 43, Fort Carson	n/a	Downrange Fort Carson	FC C	10/13/2020	
2021-008 Bravo Company, 52 nd BEB Excavation Training Request, TA 29, Fort Carson	n/a	Downrange Fort Carson	FC C	10/27/2020	
2021-012 3ABCT Excavation Training Request, TAs 30 & 31, Fort Carson	n/a	Downrange Fort Carson	FC C	10/27/2020	
2021-015 615th Engineer Construction Company (EN) Excavation Training Request, TA 7, Fort Carson	n/a	Downrange Fort Carson	FC C	10/29/2020	
2021-017 1-8 Infantry (IN), 3ABCT Excavation Training Request, TA 30, Fort Carson	n/a	Downrange Fort Carson	FC C	10/29/2020	
2021-033 Replace Tower, Range 151A, Fort Carson – Project Cancelled	DPT14-029	Downrange Fort Carson			
2021-034 Repair Flooring, Range 109 Bldgs. E & F, Fort Carson	DPT19-002	Downrange Fort Carson	FC D1b	11/6/2020	
2021-037 Install Power Pedestals, Range 111, Fort Carson	DPT18-013	Downrange Fort Carson	FC D1a	11/6/2020	The power pedestals will be for mobile gunnery training devices.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-053 & 2021-106 Bridge Repairs, Fort Carson-wide, Fort Carson	DPW21-006	Main Post Downrange Fort Carson	BE I.A2 FC D1b	11/18/2020 2/5/2021	<p>Twenty-four bridges and culverts require repairs or upgrades to meet safety requirements. Four 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>Section 106 consultation was completed in February 2021 as part of NEPA Project No. 2021-053 for these four 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.</p>
2021-074 Prairie Dog Control at Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	BE I.B2 FC D2b PC A3b PC B4b2	12/14/2020	<p>Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; EFMP training complex; Minick Ave.; Ranges 11, 24, 29, 45, 63/65, 104, 105, 109, 111, 115A, 115B, 117, 119, 121C, 139, 143, 145, 147/147A, 151, 153, & 155; the Ammunition Supply Point; and Turkey Creek Ranch on Fort Carson; the 11A MOUT site (4 Corners) and 3A at PCMS; and PCMS Airfield.</p> <p>Section 106 consultation was completed in July 2019 for the Turkey Creek Complex as part of NEPA Project No. 2019-168. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA for more information.</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
2021-076, 2021-150, 2021-237, & 2021-294 Quarterly Record of Environmental Consideration (REC) for Training	DPT21QRT2 DPT21QRT3 DPT21QRT4 DPR22QRT1	Main Post Downrange Fort Carson PCMS Cantonment 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	12/14/2020 3/15/2021 6/24/2021 9/23/2021	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 aerial); excavation training; etc. It does not cover brigade 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.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-077 Integrated Training Area Management (ITAM) Program Projects in TAs 27 & 30, Fort Carson, & TAs 7, 10, & 10, PCMS	DPT21-004	Downrange Fort Carson PCMS Numbered TAs	FC D1d FC D2a FC D2b PC B4b1 PC B4b2	12/15/2020	<p>These projects support safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events.</p> <p>Task 20-505 is the rehabilitation of Dillingham trail in TAs 7 & 14 of PCMS. Proposed work includes trail out-sloping and adding water bars.</p> <p>Task 21-166 is the rehabilitation of an existing elevated maneuver trail in TA 30 of Fort Carson. Proposed work includes adding a culvert at 2 feet deep; raising the embankment by 1 foot; widening/deepening and armoring the overflow; and installing 2 check dams and water bars.</p> <p>Task 21-174 is the decommissioning of an existing maneuver trail in TA 30 of Fort Carson. The old erosion control dam will be removed.</p> <p>Task 21-190 is the rehabilitation of an existing maneuver trail in TA 27 of Fort Carson. Proposed work includes trail out-sloping; adding water bars and armored diversions; crowning; and clearing vegetation for 150 feet along both sides of the trail.</p> <p>Task 22-554 is the rehabilitation of several existing elevated maneuver trails in TAs 7 & 10 of PCMS. Proposed work include reseeding over 80 acres to address erosion and noxious weed issues.</p> <p>Task 21-192, which is the creation of a new maneuver trail, required Section 106 consultation. See Enclosure 1, Table 2 of the Fort Carson Downrange PA.</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
2021-078 ITAM Project in TA 31, Fort Carson, & TAs 2 & 7, PCMS	DPT21-005	Downrange Fort Carson PCMS Numbered TAs	FC D2a PC B4b1 PC B4b2	12/15/2020	<p>These projects support safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events.</p> <p>Task 21-155 is the rehabilitation of an existing elevated maneuver trail in TA 31 of Fort Carson. Proposed work includes replacing the existing 18-inch-diameter culvert with a 4-foot-diameter culvert at 2 feet deep; widening and armoring the overflow; bank sloping; and installing a scour pool.</p> <p>Task 21-164 is the rehabilitation of an existing elevated maneuver trail in TA 31 of Fort Carson. Proposed work includes replacing the existing culvert with a 42-inch oval arch culvert at 2 feet deep; widening and armoring the overflow; bank sloping; and installing a scour pool.</p> <p>Task 22-552 is the rehabilitation of several elevated maneuver trails in TA 2 & 7 of PCMS. Proposed work include reseeded to address the erosion and noxious weed issues.</p>
2021-082 1-66 AR, 3ABCT Excavation Training Request, TA 40, Fort Carson	n/a	Downrange Fort Carson	FC C	12/28/2021	
2021-086 588 BEB, 3ABCT Excavation Training Request, TAs 30, 31, & 40, Fort Carson	n/a	Downrange Fort Carson	FC C	1/5/2021	
2021-088 Remove Large Boulder from Fire Break Road, TA 42, Fort Carson	DPW19-087	Downrange Fort Carson		1/11/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-090 Implement Fuels Management Projects, Fort Carson and PCMS	DPW21-018	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Lettered TAs	BE I.B3 FC D2b PC B4b2 PC C3b3	1/21/2021	Several of the proposed locations were also reviewed under NEPA Project No. 2018-001, 2018-004, 2018-119, 2018-205, 2018-333, 2019-259, 2020-054, 2020-073, & 2020-309. Information provided to proponent for avoidance of protected cultural resources.
2021-092 615 th EN Excavation Training Request, TA 7, Fort Carson	n/a	Downrange Fort Carson	FC C	1/13/2021	
2021-103 1 st Stryker Brigade Combat Team (1SBCT) Excavation Training Request, TA 29, Fort Carson	n/a	Downrange Fort Carson	FC C	2/2/2021	
2021-109 60 th Ordnance Company, 68th Combat Sustainment Support Battalion (CSSB) Excavation Training Request, TA 12, Fort Carson	n/a	Downrange Fort Carson	FC C	2/4/2021	
2021-110 Alpha Company, 299 th BEB Excavation Training Request, TA 51, Fort Carson	n/a	Downrange Fort Carson	FC C	2/4/2021	
2021-113 Install Overhangs 10x100 with Lights, Range 131C, Fort Carson	SFG21-004	Downrange Fort Carson	FC D1a FC D1b	2/10/2021	Proposed work includes: construct 3 10'x100' overhang with lights providing overhead coverage over the three ranges; install French drain piping to redirect the flow of water; replace Hesco's with 542 2'x2'x4' concrete block barriers; and install electrical outlets and lighting from current building 270 feet from overhangs.
2021-118 1/4 Infantry Division (ID) Excavation Training Request, Range 127, Fort Carson	n/a	Downrange Fort Carson	FC C	2/16/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-125 FY2021 Invasive Species Treatment, Fort Carson and PCMS	DPW21-021	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	2/25/2021	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.
2021-130 615 th EN Excavation Training Request, TA 30, Fort Carson	n/a	Downrange Fort Carson	FC C	2/25/2021	
2021-135 59 th Quartermaster Company (QM), 68 th CSSB Excavation Training Request, TA 16, Fort Carson	n/a	Downrange Fort Carson	FC C	3/1/2021	
2021-137 ITAM Program Projects in TA 30, 55,& 56, Fort Carson	DPT21-008	Downrange Fort Carson	FC D2a FC D2b	3/4/2021	This project supports safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events. Task 21-176 includes bank sloping; installing check dams and stream barbs; and removing trees in TA 30 to stabilize the landform. Task 21-182, which is the creation of a new maneuver trail, required Section 106 consultation. See Enclosure 1, Table 2 of the Fort Carson Downrange PA.
2021-176 3 rd Platoon (PLT), A Company, 52 nd BEB Excavation Training Request, TA 10, Fort Carson	2BD21-008	Downrange Fort Carson	FC C	4/2/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-180 52 nd BEB Excavation Training, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	4/6/2021	
2021-182 Construction and Maintenance of Amphibian Pitfall Traps, Fort Carson	DPW20-053 DPW20-057	Main Post Downrange Fort Carson	FC D2a	4/12/2021	Undertaking was also reviewed under NEPA Project No. 2020-143 & 2020-158. 2021-182 is an updated NEPA review as it has been over 6 months since last review and project had not been initiated. Section 106 consultation completed for areas within the Main Post. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA Annual Report.
2021-184 Alpha Company, 299 th BEB Excavation Training Request, TA 51, Fort Carson	n/a	Downrange Fort Carson	FC C	4/14/2021	
2021-186 1-38 IN & 299 th EN BN Excavation Training Request, TA 14, Fort Carson	n/a	Downrange Fort Carson	FC C	4/14/2021	
2021-192 Alpha Company, 52 nd BEB Excavation Training Request, TAs 5, 10, & 11, Fort Carson – Project Cancelled	2BD21-014	Downrange Fort Carson	FC C	4/26/2021	Project was cancelled and replaced by NEPA Project No. 2021-194.
2021-194 Alpha Company, 52 nd BEB Excavation Training Request, TAs 10 & 12, Fort Carson	n/a	Downrange Fort Carson	FC C	5/4/2021	
2021-211 2SCBT Training Request, Range 127, Fort Carson	n/a	Downrange Fort Carson	FC A FC B	5/25/2021	
2021-230 HHC, 1-12 IN Excavation Training Request, Range 155, TA 35, Fort Carson	n/a	Downrange Fort Carson	FC C	6/8/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-240 Alpha & Bravo Company, 52 nd BEB Excavation Training Request, TAs 55 & 56, Fort Carson	n/a	Downrange Fort Carson	FC C	7/2/2021	
2021-241 Forestry Management Project, Turkey Creek Complex and TAs 16, 18, & 38, Fort Carson	DPW21-044	Downrange Fort Carson	FC D2b	6/29/2021	Section 106 consultation was required for portions within the Turkey Creek Complex, as well as those APEs within or in the vicinity of a historic property. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA and Enclosure 1, Table 2 of the Fort Carson Downrange PA.
2021-243 183 rd Support Maintenance Company (SMC), 68th CSSB Excavation Training Request, TA 8, Fort Carson	n/a	Downrange Fort Carson	FC C	7/2/2021	
2021-253 Cell Booster External Antenna, Range 111L, Fort Carson	DPT21-010	Downrange Fort Carson	FC D1b	7/16/2021	Proposed work include installing an external antenna 18x6 cone device mounted on a post on the east side of building at Range 111L.
2021-256 Bravo Company, 52 nd BEB Excavation Training Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	8/6/2021	
2021-258 615th EN, 4th Engineer Battalion Excavation Training Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	7/22/2021	
2021-259 Alpha Company, 52 nd BEB Excavation Training Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	7/22/2021	
2021-260 Alpha Company, 52 nd BEB Excavation Training Request, TA 44, Fort Carson	n/a	Downrange Fort Carson	FC C	7/22/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-262 2-12 Infantry Regiment Excavation Training Request, TA 55, Fort Carson	n/a	Downrange Fort Carson	FC C	7/27/2021	
2021-264 68 th CSSB Excavation Training Request, TA 44, Fort Carson	n/a	Downrange Fort Carson	FC C	8/6/2021	
2021-273 Alpha Company, 52 nd BEB Excavation Training Request, TA 55, Fort Carson	n/a	Downrange Fort Carson	FC C	8/25/2021	
2021-277 Alpha Company, 588 th BEB Excavation Training Request, TA 17, Fort Carson	n/a	Downrange Fort Carson	FC C	8/25/2021	
2021-279 Install AC/DC Power and Grounding in Communication Nodes, Fort Carson & PCMS	DIR21-008	Main Post Downrange Fort Carson PCMS Cantonment	BE I.A2 FC D1b PC A2b	8/31/2021	The Installation Campus Area Network Modernization (ICANMOD) project is an Army directed mandate to replace and upgrade all legacy wired network infrastructure with new equipment in Fort Carson and PCMS. The AC/DC electrical, grounding, and Trimm Panel installation will occur in Bldgs. 319, 1014, 1550, 2358, 2435, 6256, 7500, 8008, 9535, & 9545 at Fort Carson and Bldg. 310 at PCMS.
2021-283 Alpha Company, 588 th BEB Excavation Training Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	9/9/2021	
2021-299 404 Aviation Support Battalion Excavation Training Request, TA 9, Fort Carson	n/a	Downrange Fort Carson	FC C	10/4/2021	

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
2021-025 Install Three-Phase Electrical Power to Range 123, Fort Carson	RES16-005	Downrange Fort Carson	11/4/2020	HC #75708 12/1/2020	<p>2021-025 is the review of the draft Environmental Assessment of the project</p> <p>No adverse effect to historic properties.</p> <p>Responses were also received from the Assiniboine & Sioux Tribes of the Fort Peck Reservation, Comanche Nation of Oklahoma, 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, 2019-163, & 2020-260.</p>
2021-053 & 2021-106 Bridge Repairs, Fort Carson-wide, Fort Carson	DPW21-006	Main Post Downrange Fort Carson	11/18/2020 2/5/2021	HC #79108 2/5/2021	<p>Twenty-four bridges and culverts require repairs or upgrades to meet safety requirements. Four 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 Comanche Nation of Oklahoma, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effect.</p> <p>See also Enclosure 1, Table 2 of the Fort Carson Built Environment PA Annual Report.</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
2021-077 Integrated Training Area Management (ITAM) Program Projects in TAs 27 & 30, Fort Carson, & TAs 7, 10, & 10, PCMS	DPT21-004	Downrange Fort Carson	12/15/2020	HC #79340 2/23/2021	Section 106 consultation was required for Task 21-192, which is the creation of a new maneuver trail. No historic properties affected. Responses were also received from the Comanche Nation of Oklahoma and Pawnee Nation of Oklahoma; both parties agreed with the finding of effect.
2021-137 ITAM Program Projects in TA 30, 55,& 56, Fort Carson	DPT21-008	Downrange Fort Carson	3/4/2021	HC #79674 4/29/2021	Section 106 consultation covered Task 21-182, which is the creation of a new maneuver trail. No historic properties affected. Responses were also received from the Cheyenne River Sioux Tribe and Pawnee Nation of Oklahoma; both parties agreed with the finding of effect.
2021-195 4 th Infantry Division Explosive Training Exercise, TA 30, Fort Carson	n/a	Downrange Fort Carson	4/28/2021	HC #80124 n/a	No adverse effects to historic properties. Via correspondence dated 8/19/2021, the SHPO recommended a re-survey of the areas inventoried in the late 1970s to early 1980s by Grand River Consultants, Inc. Further discussions with the SHPO suggested the development of predictive model to determine the probability of standing architectural resources and/or rock art within the APEs, focusing survey efforts in areas of high probability, in lieu of large scale survey. USAG Fort Carson is working on a response to the SHPO. Responses were also received from the Comanche Nation of Oklahoma, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed to the finding of effect.

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
2021-241 Forestry Management Project, Turkey Creek Complex and TAs 16, 18, & 38, Fort Carson	DPW21-044	Downrange Fort Carson	6/29/2021	HC #80339 9/28/2021	<p>Section 106 consultation was required for portions within the Turkey Creek Complex, as well as those APEs within or in the vicinity of a historic property.</p> <p>No adverse effects to historic properties.</p> <p>Responses were also received from the Comanche Nation of Oklahoma, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma; all agreed with the finding of effect.</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
2021-006 Review of the Programmatic Environmental Assessment (PEA) for the Fielding of the Maneuver Short Range Air Defense (M-SHORAD) System	n/a	n/a	108/2020	This is a review of the preliminary draft PEA to analyze the environmental and socioeconomic impacts with the fielding of the new M-SHORAD system. Fort Carson is one of the installations proposed to receive this new system. If Fort Carson is chosen, the required construction and training needs associated with the M-SHORAD system will be further analyzed.
2021-011 & 2021-044 Review of the Programmatic Environmental Assessment (PEA) for the Armored Multi-Purpose Vehicle (AMPV), Fort Carson	n/a	n/a	10/22/2020 11/6/2020	2021-011 and 2021-044 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. Undertaking has been previously reviewed under NEPA Project No. 2020-299.

ENCLOSURE 2:
FORT CARSON DOWNRANGE PA TASK TRACKER
(CURRENT AS OF SEPTEMBER 30, 2021)

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. CRM is awaiting submission of the preliminary draft technical report and site documentation. Project is ongoing.</p> <p>The SHPO disagrees with the USAG's determination of eligibility for 28 sites. USAG is drafting a response to address the SHPO's concerns.</p> <p>Protection strategies have been implemented at these sites.</p>
I.C.1	SHPO concurrence with NRHP eligibility determinations from re-evaluations	60 days after submission	TBD	
I.D	Continue consultation with Tribes concerning site protection, monitoring frequencies, and TCPs and sacred sites identification	Ongoing action	n/a	<p>Consultation meeting was held virtually on January 27, 2021. In attendance were representatives from the Jicarilla Apache Nation, Pawnee Nation of Oklahoma, Rosebud Sioux Tribe, Southern Ute Indian Tribe, Standing Rock Sioux, and Ute Mountain Ute.</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>

Stipulation	Action	Duration	Date Required	Remarks
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections. FY21: Contract awarded in April 2021 to assist with monitoring activities.
VI.A	Implement cultural awareness training of all personnel involved in the execution of undertakings	Annually	n/a	Cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians, and contractors.
VI.B	Offsetting mitigation: Native American Ethnographic Oral History Project	Initiate within 3 years of signing	03/30/2017	Contract was awarded in September 2019 for the completion of traditional use study of the Hogback at Piñon Canyon Maneuver Site. Site visits are scheduled to begin in October of 2021.
VI.B	Offsetting mitigation: Archaeological Context Project	Initiate within 3 years of signing	03/30/2017	Due to a lack of funding, USAG Fort Carson was not able to award a contract this fiscal year for the Historic Mining Context Study. It will most likely not be awarded until FY23 or FY24.
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. Potential ideas for this project were discussed at the Annual Consulting Parties meeting held virtually on January 13, 2021.
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 CRM is currently drafting the 5-year ICRMP Update.

ENCLOSURE 3:
SHPO CORRESPONDENCE ON FY20 ANNUAL REPORT



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

Re: Fiscal Year (FY) 2020 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 correspondence dated November 13, 2020 and received by our office on November 16, 2020 regarding review of the Fiscal Year 2020 (FY 20) 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 (DRFC), Attachment 3—Pinon Canyon (PCMS)]. Below, we describe a few general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Similar to our comments on the FY 2018 and 2019 annual reports, our first general comment concerns the training exercises conducted by USAG Fort Carson. Our previous comments noted that military use of the landscape has the potential to adversely affect historic properties. While we agreed with the minimization efforts implemented, we requested that USAG Fort Carson initiate consultation with our office on mitigating adverse effects. In your December 2019 and October 2020 responses, you acknowledged that the trainings were causing adverse effects and that the Programmatic Agreements (PAs) require consultation to resolve those effects according to 36 CFR 800.6. Your responses, however, also noted that USAG Fort Carson only considers adverse effects on a “case-by-case basis” and that you “do not agree to an overarching approach to mitigation.”

While we appreciate the acknowledgement of the need to resolve adverse effects and recent attempts to mitigate adverse effects, we continue to argue that military use of the landscape has the potential to adversely affect historic properties. The development of resource strategies that seek to mitigate effects to types or groupings of resources would comprise an important and effective approach to mitigating some of these potential adverse effects. The cumulative scale and extent of impacts caused by the training exercises will result in the loss of a significant opportunity to study the relationship and association of these resources on a



larger scale. Further, resources such as traditional cultural properties may be considered on a broader scale than an individual feature or archaeological site. The relationship between these various resources is important to understanding the area's past and the cultural landscape may comprise an important aspect of a resource's significance. Without the development of an effective resource strategy, important information may be lost due to cumulative effects of these exercises and not all of the adverse effects may be appropriately mitigated. We request that consultations regarding resolution of adverse effects continue and that USAG Fort Carson continues its commitment to resolve adverse effects.

We also continue to argue 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 effectively reducing the frequency of inadvertent entries. Thirty nine sites were entered in 2010, 22 sites were entered in 2013, 48 sites were entered in 2015, 45 sites were entered in 2017, and 65 sites entered during 2018. While we appreciate the additional information provided in your 2019 and 2020 correspondences and are encouraged to hear about potential successes and that the Cultural Resources Program staff have had increased interactions and integration into military exercises, we note that resources continue to experience inadvertent entries. An example consists of 5PE.2966 that experienced six inadvertent entries, one of which occurred in 2019.

Your December 2019 correspondence notes that feedback is sought regarding the training materials and that you "regularly review the training materials and methods of dissemination to achieve maximum results." The correspondence, however, does not discuss how this is conducted. A quantifiable analysis of the effectiveness of the training would help in determining gaps in the training program. This should include quantitative data and could include an analysis of the training retention rate between different levels of personnel. A study could also determine the reach of different training formats. Further, we request information on the type of training provided for different levels of personnel. We continue to note from our FY 19 response that training emphasized for both high and low ranking personnel that incorporates varying methods and formats as well as information oriented to different groups will help ensure the efficacy of the program. Training and resources oriented towards the variety of different military exercises will also help ensure the effectiveness of the program.

We understand that additional minimization and avoidance measures are being employed including the use of Siebert markers. We continue to support the use of Siebert markers and other measures. We, however, also recommend studying the effectiveness of the measures employed. Using 5PE.2966 as an example, inadvertent entries occurred at the site despite the presence of markers that surround the site. We recommend studying how these measures fail and determining potential improvements or additional measures to avoid and minimize inadvertent entries.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Matthew Marques, Section 106 Compliance Manager, at (303) 866-4678 or matthew.marques@state.co.us, Mitch Schaefer, Section 106 Compliance Manager, at (303) 866-2673 or mitch.schaefer@state.co.us, or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



Attachment 1:

SHPO Comments on FY 2020 Fort Carson Built Environment PA Annual Report (HC# 58731)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

As a minor point of clarification, the 2019-379 Forest Thinning, Camp Falcon and Training Area 5 was reviewed under HC#76914 (not 76752). Nevertheless, our office did concur the undertaking would result in no historic properties affected in a letter dated December 18, 2019.

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. Dispute Resolution

No comments.



Attachment 2:

SHPO Comments on FY 2020 Down Range Fort Carson PA Annual Report (HC# 63877)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2019-134, 2019-163, 2020-088, 2020-249, and 2020-294: Our office looks forward to consultation on these undertakings.

III. Action Updates

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

I.C: We appreciate the development of draft research designs to evaluate the eligibility of resources determined as “needs data” and the opportunity to review the designs. We, however, note that additional research is needed for additional archaeological sites. In particular, we note that research is needed for the Turkey Creek Rock Art Historic District.

As stated in our response to the FY 19 annual report, 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.

Your October 2020 letter responded to our comments that you will collaborate with tribes in the near future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We agree with these recommendations and look forward to further consultation regarding the district and any potential traditional cultural properties.

III.E: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources, sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.



VI.B: We note that earlier this year we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. Has this been developed or will this be developed by the contractor? We look forward to reviewing the scope of work and the results of this study.

B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson's October 2020 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.

What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be aware of and take responsibility to comply with regulations and laws to protect cultural resources. Quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

C. Inadvertent Entries and/or Impacts to Historic Properties

We appreciate USAG Fort Carson's efforts to document inadvertent entries and cumulative effects to historic properties. We, however, note that the exercises continue to inadvertently enter historic properties and recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

D. Inadvertent Discoveries

No comments.

E. Emergency Response

No comments.

F. Amendment

No comments.

G. Dispute Resolution

No comments.

H. Other

We look forward to the development of a memorandum of agreement to resolve adverse effects to 5PE.2966.



**Attachment 3:
SHPO Comments on FY 2020 PCMS PA Annual Report (HC# 65747)**

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2019-285: We look forward to consulting on this undertaking.

2020-299: Will the new vehicles cause different impacts or increase the scale of impacts to historic properties? Will training, resources, minimization measures, and avoidance measures need to be altered to address the use of the new vehicle?

III. Action Updates

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

I.B: As stated in our response to the FY 19 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 correspondence, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

We appreciate the development of draft research designs and the opportunity to review the designs. We look forward to reviewing the results of the fieldwork. We also look forward to reviewing the results of your Hogback study.

III.A: We recommend analyzing the effectiveness of the proposed avoidance and minimization measures. Please refer to our letter for additional detail.

III.D: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

B. Cultural Resource Awareness Training

Please refer to our comments in our letter regarding trainings.

C. Brigade Training Exercises

Please refer to our comments in our letter regarding trainings and resources provided to personnel as well as comments regarding avoidance and minimization measures.



D. Inadvertent Entries and/or Impacts to Historic Properties

We look forward to reviewing the documentation concerning the Bent Canyon Wildland Fire and inadvertent entries at 5LA.4750, 5LA.6108, and 5LA.13436. We also 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. Dispute Resolution

No comments.

I. Other.

We look forward to consultation regarding the resolution of adverse effects.



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

January 8, 2021

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

Dear Mr. Turner:

Thank you for your correspondence dated December 16, 2020, concerning your review of the fiscal year (FY) 2020 annual reports for the three U.S. Army Garrison (USAG) Fort Carson 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.

Fort Carson has been an active duty Army installation since 1942, and has been its current size since 1965. It has always been home to armored and infantry brigades, and is now home to Stryker and Combat Aviation brigades as well. Training occurs daily at Fort Carson; this includes mounted and dismounted maneuvers, aviation training, excavation training, and live-fire training. Due to this high operation tempo and the types of training involved, we did consult with your office and the Advisory Council on Historic Preservation (ACHP) during the development of the *Programmatic Agreement on Military Training and Operational Support Activities at Down Range Fort Carson* (Fort Carson Downrange PA) on an "overarching approach to mitigation" for the resolution of potential adverse effects to historic properties. The Fort Carson Cultural Resources Manager (CRM) also consulted with the Directorate of Plans, Training, Mobilization, and Security (DPTMS) to determine which areas within downrange Fort Carson are used heavily for training and better understand what types of training occur in them. As a result, this PA included language to implement mitigation measures to resolve potential adverse effects at 22 resources and unrecorded historic properties within areas exempted from cultural resources survey.

All signatories recognized upfront that inadvertent entry and/or other impacts may occur at historic properties, and consequently the Fort Carson Downrange PA included a very robust inspection and monitoring program. Since the inception of the program in 2014, inadvertent entries related to military training have been identified and documented at 8 of the 178 protected resources within the downrange area: 5EP161, 5EP1177, 5EP2524, 5EP5974, 5EP7602, 5PE793, 5PE2966, and 5PE8157. Site 5PE2966 has been entered three separate times (not six as stated in your letter) by

military tactical vehicles. Given the multiple entries, we determined cumulative adverse effects were occurring at this site.

Given that an overarching approach to mitigation was agreed upon by your office, the ACHP and USAG Ft Carson during the development and execution of the Fort Carson Downrange PA, and considering the high operational tempo of military training downrange and low number of protected resources entered since protection measures and cultural resources awareness training have been implemented, and considering also, that only 2 of the 178 downrange protected resources have been adversely affected as a result of these recent entries, we do not agree additional broad scale mitigation is necessary to mitigate potential direct, indirect, and cumulative adverse effects related to military use of downrange. As stated in our October 2020 letter, we will continue to consult on a case-by-case basis when potential adverse effects to historic properties at Fort Carson are identified.

As also stated in our October 2020 letter, USAG Fort Carson does 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. We have been actively working to develop mitigation plans for 36 historic properties at PCMS that were adversely affected or were entered during multiple exercises, as discussed during past annual programmatic agreement meetings with your office and consulting/interested parties. It is expected these mitigation plans will help inform our decision on the best strategy to employ. Based on that, we will be ready to discuss various types of mitigation with your office, Native American Tribes, and other consulting/interested parties in the near future as we continue consultation to resolve for adverse effects. We can share at this point that we are looking at strategies that seek to mitigate effects to the largest number of resources perhaps by types or groupings.

Please be informed that we agree with your statement that traditional cultural properties should be considered on a broader scale and not just at the individual feature or site level. This is one of the reasons a traditional use study of the Hogback is being completed. Also, we regularly consult with culturally affiliated Native American Tribes to identify, interpret, and evaluate these types of resources.

On a related matter, we would like to reiterate, as explained in our December 2019 letter, our opinion is one should not use quantitative data alone to assess the effectiveness of our cultural resources awareness training program. We continue to feel that comparing different brigade training exercises to arrive at conclusions on the program effectiveness is flawed and should not be used to judge it. We remain hopeful that you will review again the information in that letter to arrive at the same conclusion.

We firmly believe that what speaks to the success of the cultural resource awareness training is the open communication and cooperative planning lines established with the 4th Infantry Division leadership, as well as with other key Garrison

organizations like DPTMS. 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. Cultural Resources Program staff continually work with the 4ID's geospatial staff to update and ensure protected resources are always included on paper and digital maps used by units during training. (Enclosure 4 includes examples of the cultural resources awareness training and other materials created by USAG Fort Carson). Furthermore, each directorate, brigade, battalion, company, and contractor have designated Environmental Protection Officers (EPOs). This individual is the point-of-contact for environmental matters and the primary contact for fulfilling the unit's environmental responsibilities. EPOs also advise the Commander or Director about significant environmental aspects and impacts, and serve as liaisons between the unit and the Environmental Division. Newly designated EPOs must take a 40-hour certification course, which includes cultural resources awareness training. At the end of the course, the EPOs are tested and certified. EPOs also take an 8-hour refresher course annually.

For your situational awareness, the Department of Army has developed an organization (Training and Doctrine Command Culture Center), which is responsible for developing and delivering cultural resources awareness training to all Army leaders, including 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, 719-744-6640.

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

As a minor point of clarification, the 2019-379 Forest Thinning, Camp Falcon and Training Area 5 was reviewed under HC#76914 (not 76752). Nevertheless, our office did concur with the undertaking would result in no historic properties affected in a letter dated December 18, 2019.

USAG Response: The subject line on your letter stated the undertaking was reviewed under HC #76752 (see Figure 1). We will update our files if this is indeed the incorrect project review number. Thank you.

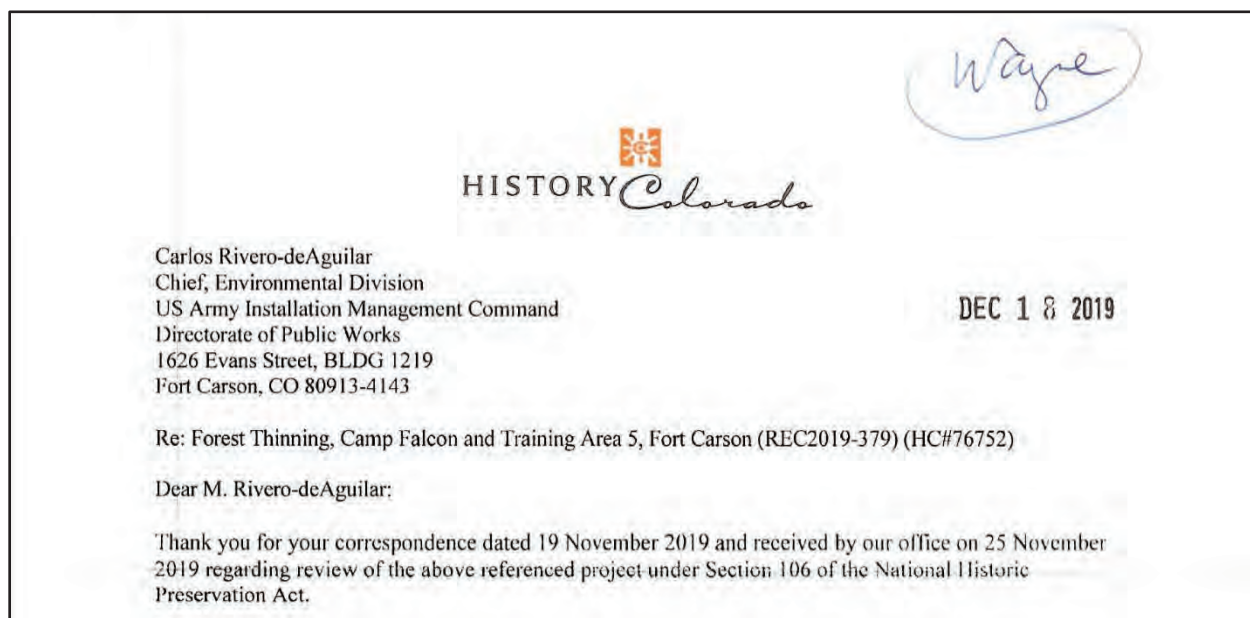


Figure 1. Note subject line states 2019-379 Forest Thinning, Camp Falcon and Training Area 5, Fort Carson was reviewed under HC #76752 (not HC #76914).

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.

USAG Response: 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, 2019-163, 2020-088, 2020-249, and 2020-294: Our office looks forward to consultation on these undertakings.

USAG Response: Thank you for your comment. Below is an update to the consultation status for these undertakings:

- 2019-134: Section 106 consultation has not been initiated.
- 2019-163: Section 106 consultation has been completed for 2019-163 Installation of Three-Phase Electrical to Range 123. The SHPO concurred with the finding of “no adverse effects to historic properties” via correspondence dated December 1, 2020 (HC #75708).
- 2020-088 / 2020-294: Section 106 consultation will be initiated once the Cultural Resources Manager has received all requested information from the project proponent.
- 2020-249: Section 106 consultation will be initiated once the Cultural Resources Manager has received all requested information from the project proponent.

III. Action Updates

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

I.C: We appreciate the development of draft research designs to evaluate the eligibility of resources determined as “needs data” and the opportunity to review the designs. We, however, note that additional research is needed for additional archaeological sites. In particular we note that research is needed for the Turkey Creek Rock Art Historic District.

As stated in our response to the FY 19 annual report, USAG 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.

Your October 2020 letter responded to our comments that you will collaborate with tribes in the near future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We agree with these recommendations and look forward to further consultation regarding the district and any potential traditional cultural properties.

USAG Response: Thank you for your comment. We look forward to working with you on this project.

III.E: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources, sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

USAG Response: This comment has been addressed in the body of the letter.

VI.B: We note that earlier this year we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. Has this been developed or will this be developed by the contractor? We look forward to reviewing the scope of work and the results of this study.

USAG Response: Once the finalized scope of work for the Historic Mining Context Study has been completed, you will have an opportunity to review and comment it. The tasks outlined in the draft scope that you reviewed have not changed.

B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson’s October 2020 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.

What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be aware of and take responsibility to comply with regulations and laws to protect cultural resources. Quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

USAG Response: 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 and cumulative effects to historic properties. We, however, note that the exercises continue to inadvertently enter historic properties and recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

USAG Response: 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.

H. Other

We look forward to the development of a memorandum of agreement to resolve adverse effects to 5PE.2966.

USAG Response: Thank you for your comment. We also look forward to working with you and other consulting parties in the development of a memorandum of agreement to resolve adverse effects at this site.

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

2019-285: We look forward to consulting on this undertaking.

USAG Response: Thank you for your comment.

2020-299: Will the new vehicles cause different impacts or increase the scale of impacts to historic properties? Will training, resources, minimization measures, and avoidance measures need to be altered to address the use of the new vehicle?

USAG Response: The new vehicle operates doctrinally the same as the vehicle it will replace. There will be no change to the type or scale of impacts to historic properties. Training, minimization measures, and avoidance measures will not need to be altered to address the use of the new vehicle.

III. Action Updates

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

I.B: As stated in our response to the FY 19 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 correspondence, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

USAG Response: 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.

We appreciate the development of draft research designs and the opportunity to review the designs. We look forward to reviewing the results of the fieldwork. We also look forward to reviewing the results of your Hogback study.

USAG Response: Thank you for your comment.

III.A: We recommend analyzing the effectiveness of the proposed avoidance and minimization measures. Please refer to our letter for additional detail.

USAG Response: This comment has been addressed in the body of the letter.

III.D: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

USAG Response: This comment has been addressed in the body of the letter.

B. Cultural Resource Awareness Training

Please refer to our comments in our letter regarding trainings.

USAG Response: This comment has been addressed in the body of the letter.

C. Brigade Training Exercises

Please refer to our comments in our letter regarding trainings and resources provided to personnel as well as comments regarding avoidance and minimization measures.

USAG Response: This comment has been addressed in the body of the letter.

D. Inadvertent Entries and/or Impacts to Historic Properties

We look forward to reviewing the documentation concerning the Bent Canyon Wildland Fire and inadvertent entries at 5LA.4750, 5LA.6108, and 5LA.13436. We also look forward to continued consultation to resolve the effects of previous training exercises.

USAG Response: Thank you for your comment. As a status update, all known protected resources within the Bent Canyon Wildland Fire footprint have been inspected, and site documentation has been updated. Once the site documentation has been reviewed, it will be forwarded to your office. Approximately 134 acres have been surveyed and 12 newly identified sites recorded. A technical report of investigations

and all associated documentation will be forwarded to your office when the survey has been completed.

The PCMS Archaeologist is currently verifying the site marking contractor's work. All inadvertent entries will be documented (to include 5LA4750, 5LA6108, and 5LA13436) and an after action report submitted.

E. Inadvertent Discoveries

No comments.

F. Emergency Response

No comments.

G. Amendment

No comments.

H. Dispute Resolution

No comments.

I. Other

We look forward to consultation regarding the resolution of adverse effects.

USAG Response: Thank you for your comment. We also look forward to working with you to resolve adverse effects that have resulted from these past brigade exercises.

Enclosure 4:
Examples of Cultural Resources Awareness Training Materials



Cultural Resources Management

WHAT YOU NEED TO KNOW AS AN ENVIRONMENTAL PROTECTION OFFICER

Course Objectives

You will learn:

1. What are cultural resources?
2. Why is it important to protect cultural resources?
3. What are the legal requirements?
4. What are your responsibilities?
5. Where can you learn more?



Fort Carson Cultural Resources Management Program

Mission:

"To support military training requirements, achieve regulatory compliance, and ensure stewardship responsibilities are met."



Goals:

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

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3

Fort Carson Cultural Resources Management Program

Objectives:

- Provide accurate data regarding access restrictions
- Monitor cultural resources for impacts
- Implement protective measures
- Implement conservation measures
- Integrate cultural resources management with Installation operations
- Consult with external stakeholders
- Sustain public outreach



Tribal representatives discuss the importance of a rock art panel.

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4

What are Cultural Resources?

Definition:

Non-renewable remnants of past human activities that have cultural or historical value and meaning to a group of people or a society

Or simply:

The stuff we leave behind



Cultural resources can be thousands of years old, hundreds of years old, or from the more recent past.

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5

Cultural Resources Examples:



- Rock art, i.e. petroglyphs (carvings) and pictographs (paintings)
- Archaeological sites
- Historical buildings, structures, and objects
- Historical roads and trails
- Sacred sites and traditional cultural properties
- Human burials
- Artifacts
- Ruins



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Fort Carson's Cultural Resources

Fort Carson (as of August 2017):

- 2,385 Cultural Resources
- 1 Listed National Register District
- 133 Eligible
- 68 Needs Data
- 2,165 Not Eligible
- 18 No Official Determination



PCMS (as of August 2017):

- 6,248 Cultural Resources
- 573 Eligible
- 660 Needs Data
- 4,999 Not Eligible
- 16 No Official Determination



Complex and Simple Habitation Sites
 Temporary Field Camps
 Stone Artifact Scatters/Quarry Locations
 Food Procurement/Processing Sites
 Rock Art Panels (Prehistoric & Historic)
 Historic Ranches/Farmsteads
 Military Construction (1942-Present)
 Stage Station/Mail Route Remnants
 Small Mining Operations

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Why is it Important to Protect Cultural Resources?

- They provide information regarding **our** heritage, **our** practices, and **our** beliefs.
 - Contributes to **our** sense of place and identity
- These areas may have profound religious and spiritual significance to Native American tribes and other ethnic groups.
- Sacred Native American sites are rooted in the history of their people and maintain the continuity of traditional beliefs and practices.
- By preserving, protecting, and respecting cultural resources, you ensure these resources are available for future generations
 - Non-renewable resource – **once destroyed, can never be restored**
- It is **our** duty, as the land manager to be good stewards, ensuring compliance with all environmental and cultural laws and regulations.

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8

Another Reason for Protecting Cultural Resources...

BECAUSE IT'S THE LAW!

National Historic Preservation Act (NHPA)

Archaeological Resources Protection Act (ARPA)

Native American Graves Protection and Repatriation Act (NAGPRA)

American Antiquities Act of 1906

American Indian Religious Freedom Act

Army Regulation 200-1

And more...

And some of these laws, such as the Archaeological Resources Protection Act, carry criminal and civil penalties.

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9

Section 106 of the National Historic Preservation Act (NHPA)

- Section 106 of the NHPA requires us to consider the effects of our actions on historic properties.
 - Historic properties are any cultural resource that is listed in or is eligible for inclusion in the National Register of Historic Places (NRHP)
 - NRHP – list of cultural resources determined to be significant to the national, state, regional, or local history
- How **You** Can Comply with Section 106:
- Follow the Standard Operating Procedures (SOPs) in the Integrated Cultural Resources Management Plan (ICRMP)
 - SOP No. 1: Section 106 Compliance for Project Proponents
 - SOP No. 2: Mission Training of Military and Tenant Personnel
 - SOP No. 3: Emergency Operations

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What Happens When We Do Not Comply with NHPA Section 106?

- Colorado State Historic Preservation Officer contacts the Advisory Council on Historic Preservation (ACHP)
- ACHP contacts the Secretary of the Army
- Garrison Commander must answer to the Secretary of the Army on why we foreclosed on the consultation process
- Then, it falls to **YOU** to answer why
- Lawsuits can be filed by Tribes, other interested parties, and the public
 - Comanche Nation v. United States
 - Pueblo of Sandia v. United States
 - National Trust for Historic Preservation v. Department of State
 - City of Grapevine v. Department of Transportation
 - Paulina Lake Historic Cabin Owners Association v. U.S. Forest Service

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11

Scenario 1: Comanche Nation vs. United States

- Fort Sill proposed to constructed a 43,000 sq ft Training Support Center (TSC) warehouse (\$7.3 million) 1,662 ft southwest of the southern boundary of the Medicine Bluffs National Historic Feature
- Medicine Bluffs is a sacred site/TCP that is listed in the NRHP
- Fort Sill sent the draft final Environmental Assessment in Sep 2006
- Section 106 consultation letters mailed in Aug 2007
 - Comanche Nation requested more information and voiced concerns in correspondence dated Aug 2007, Oct 2007, Feb 2008, May 2008, & July 2008
- Construction of TSC began Aug 2008
- Comanche Nation filed a lawsuit in 15 Aug 2008
- Construction of TSC at new location in Oct 2009

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12

Scenario 1: Comanche Nation vs. United States

Comanche Nation asserted Fort Sill:

- Violated the Religious Freedom Restoration Act – building the TSC warehouse at the proposed location would interfere with the exercise of the Tribe's religious beliefs
- Violated the NHPA – Fort Sill failed to make a "reasonable and good faith effort" to consult to identify and resolve adverse effects

Outcome

- Project stopped and moved to another location
- \$650,000 lost on project costs and unknown \$\$\$ spent on legal costs
- Case is a precedent

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13

Archaeological Resources Protection Act

- Knowingly damaging an archaeological resource is a violation of the Archaeological Resources Protection Act (ARPA)
 - Includes looting, digging within a site, graffiti or other defacement, removing cultural features, etc.
- ARPA carries up to **\$100,000 fine** and **1 year in jail** for 1st offense



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Scenario 2: Graffiti

- Sep 2013 – archaeologists observed graffiti at a sacred site/TCP at the PCMS
- Led to an Article 15-6 investigation
- Now used as an example of what not to do
- **Graffiti is not tolerated anywhere, any time**
- Defacing federal property is against the law
 - Destruction of Government Property (18 U.S.C §§ 1361-1363) – up to \$250,000 fine, 10 years imprisonment, or both
 - ARPA
- Anyone caught defacing government property (buildings, rock faces, etc) will be prosecuted



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5

How Can You Help Protect and Preserve Cultural Resources?

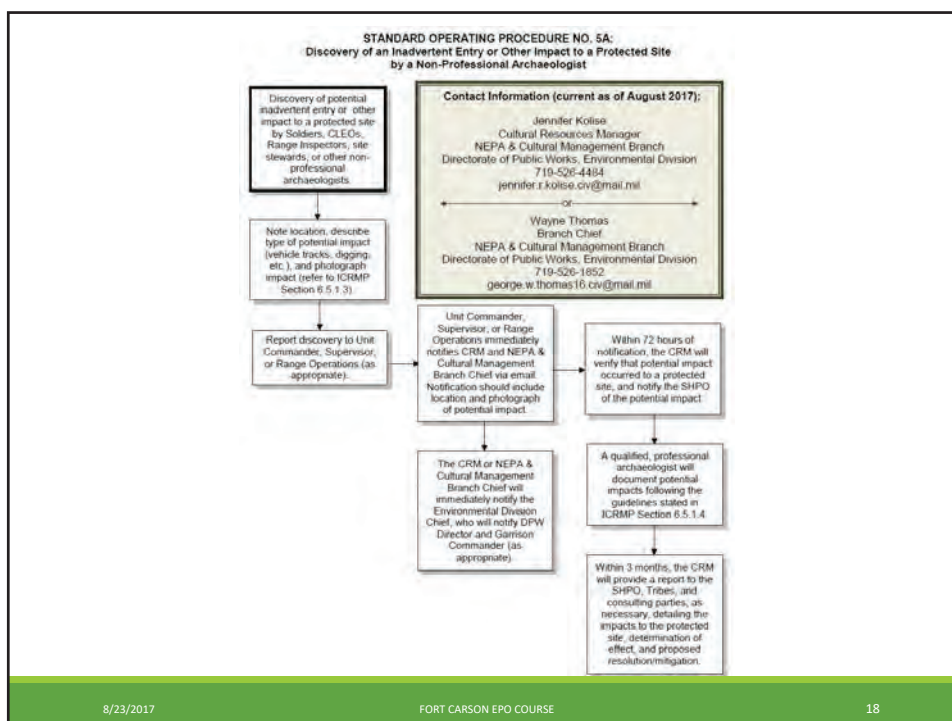
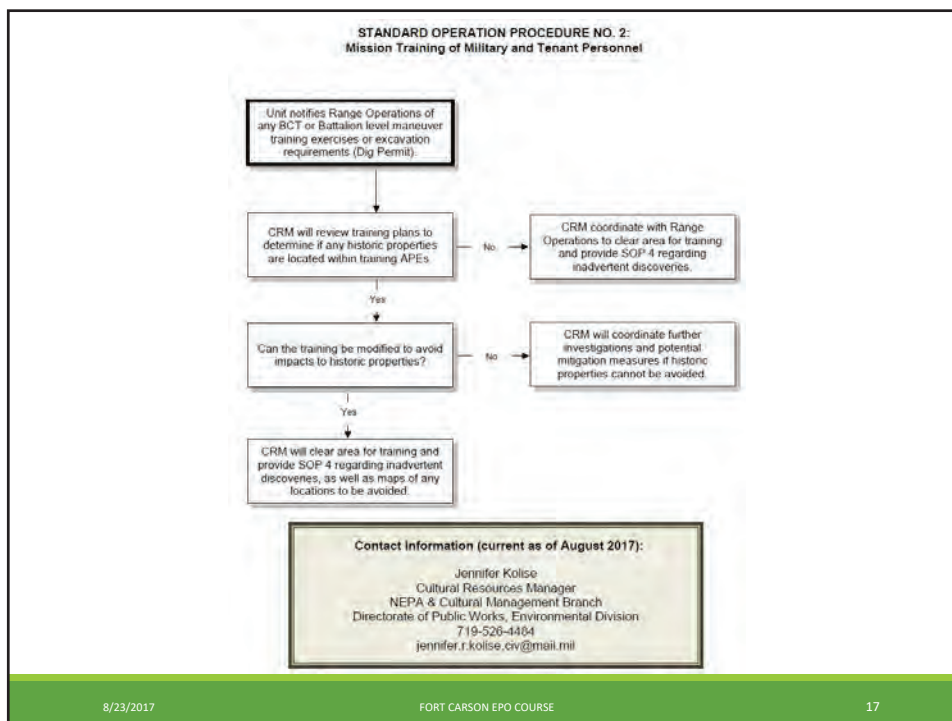
DO:

- Coordinate land use with Range Operations to ensure you are in an approved area.
 - **Especially excavation training (dig permit)**
 - Refer to ICRMP SOP No. 2
- Obey maneuver damage, environmental, and cultural resources protection policies and procedures.
- Observe posted signs, fencing, and Seibert marking indicating restricted areas that may be off-limits to vehicles, digging, bivouacking or other activities.
- Report any signs of looting, vandalism, or other damage to a cultural site to Range Operations and/or the Cultural Resources Manager (CRM).
 - Refer to ICRMP SOP No. 5A
- Stay vigilant!

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16



How Can You Help Protect and Preserve Cultural Resources?

DON'T:

- Collect any artifacts, including arrowheads and bottles.
- Disturb stone circles, rock mounds, ruins, or other cultural features, including using stones from cultural features to create defensive positions or resting areas.
- Lean against, sit on, or step on rock mounds, rock walls, ruins, or other cultural features.
- Touch or deface rock art or historical structures.
- Trespass in historical structures.

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If you find artifacts, bones, or other possible cultural items...

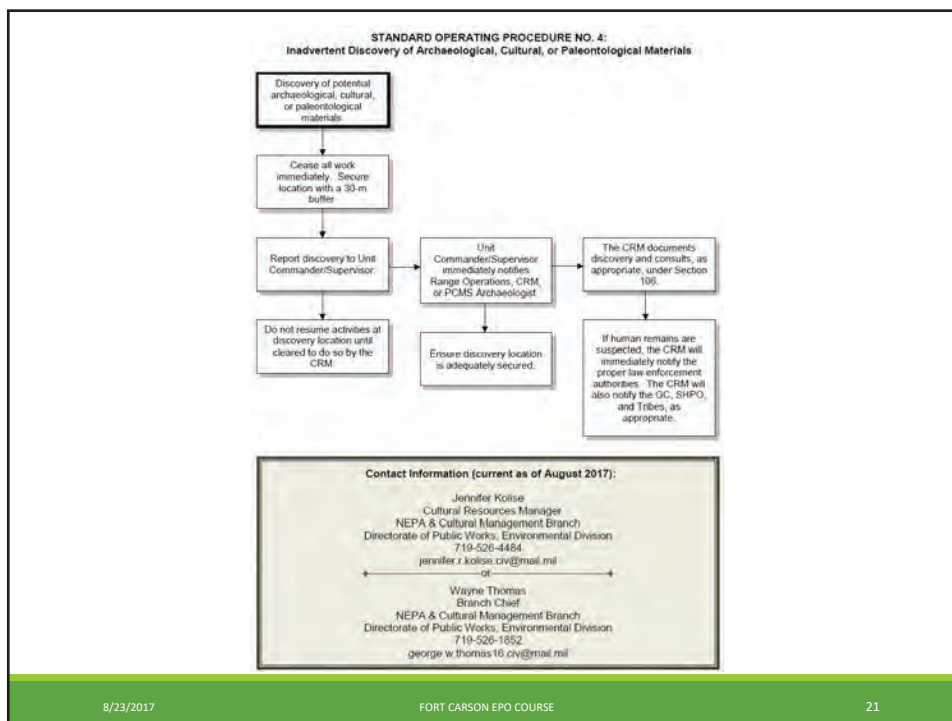
STOP WORK IMMEDIATELY

- Flag a protective buffer around the location of the discovery.
- Report the discovery to:
 - Fort Carson Range Operations (719-526-5698) or PCMS Range Operations (719-503-6120); and/or
 - Fort Carson CRM (719-526-4484) or PCMS Archaeologist (719-503-6136)
- You will be notified when you can proceed.

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What is the Harm in Taking a Souvenir?

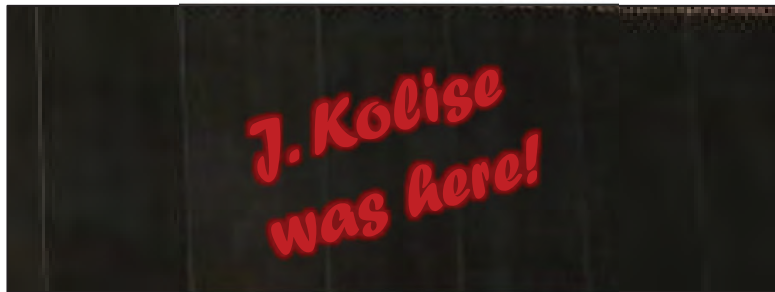
CHARLES V McMANUS • CARL L PALMER • DONNELL F REED Jr • DONALD B RODDY • JAMES D SMITH • PAUL BERT L STOKES • ROBERT E TAFT • RICHARD TESTA • ROBERT WARD Jr • REGINALD A WATKINS • ALEXANDER V EDICTO P BAYRON • CALVIN BOUKNIGHT • RICHARD L C DE LACY • JOHN C ELZY III • LUTHER V GILREATH • K • TOMMIE KEETON • BILLY M KNIGHT • REAVIS A Mc • BILLY J TALLEY • OSVALDO AMODIAS • CHARLIE ANDI • ER Jr • DONALD A BARNES • JIMMIE W BARTON • ROY SNYDER P BEMBRY • CLARENCE V BEVERHOUDT • D • MMY F BOREN • ROY H BOWLING • THOMAS G BRA • ARRY T BURNITE • WILLIAM R BURTON Jr • EMMETT L • ALVIN F COOKS • FRANCISCO

If every person who visited the Vietnam Memorial decided to take one name off as a souvenir, eventually there would be nothing left.

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The same is true with archaeological sites. If everyone who visited a site took an arrowhead or bottle, eventually there would be nothing left that would give us information about the people who lived there. **OUR HERITAGE WOULD BE LOST!**

What's Wrong with this Picture?



Seriously...where's the harm in leaving your legacy somewhere?

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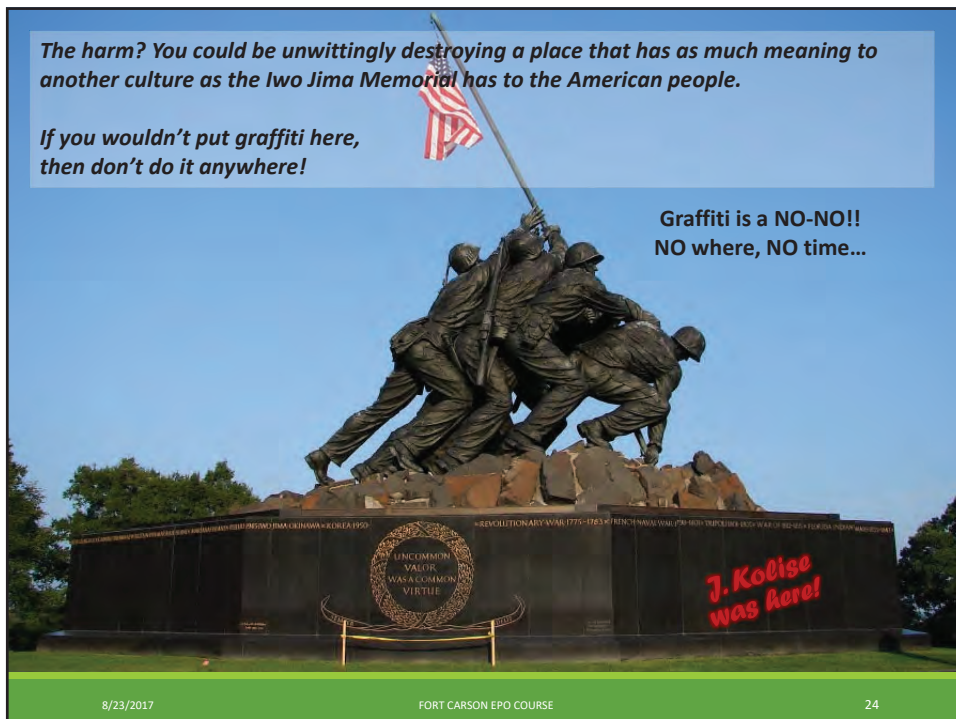
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23

The harm? You could be unwittingly destroying a place that has as much meaning to another culture as the Iwo Jima Memorial has to the American people.

If you wouldn't put graffiti here, then don't do it anywhere!

Graffiti is a NO-NO!!
NO where, NO time...

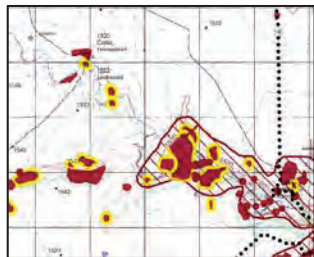


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Site Protection Measures



Protected Resources JCR Map

Red = unmarked restricted area
 Red with yellow outline = marked restricted area
 Red hash-marked area = dismantled training only
 White line through restricted area = authorized travel corridor

No digging or mounted maneuvers within protected areas

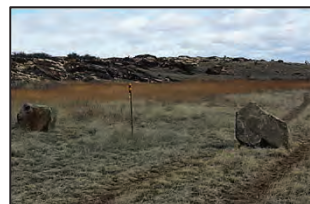


Seibert Marker

Red, yellow, and white 3M reflective tape
 Black stripe points to inside of restricted area.



Protection Fences with Restricted Access Signs



Seibert Markers and Boulders

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Where Can You Learn More?

Integrated Cultural Resources Management Plan (ICRMP)

- Fort Carson-specific tool for the management of cultural resources
 - Outlines program obligations, goals, priorities, and SOPs
- Chapter 7 contains the SOPs relevant to your job
 - SOP No. 1: Section 106 Compliance for Project Proponents
 - SOP No. 2: Mission Training of Military and Tenant Personnel
 - SOP No. 3: Emergency Operations
 - SOP No. 4: Inadvertent Discovery of Archaeological, Cultural, or Paleontological Materials
 - SOP No. 5A: Discovery of an Inadvertent Entry or Other Impact to a Protected Site by a Non-Professional Archaeologist
- Where can it be found?
 - <https://www.carson.army.mil/organizations/dpw.html#three>

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Main Points to Remember

- Cultural resources are non-renewable.
- Obey cultural resources laws and regulations
- Follow Fort Carson-specific guidance and SOPs outlined in the ICRMP
- No digging or mounted maneuvers within protected areas
- Use established travel corridors through protected areas
- Leave cultural resources as you found them
- Report any suspected looting, vandalism, site entries, etc., immediately to Range Operations and/or the CRM
- We are here to help you: 526-4484 (CRM) or 503-6136 (PCMS Archaeologist)

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27

The Army is legally required to protect and manage cultural resources.

A. True

B. False

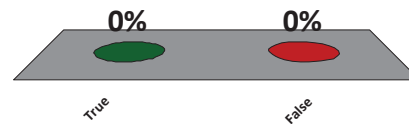
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28

The Army is legally required to protect and manage cultural resources.

- A. True
- B. False



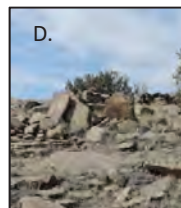
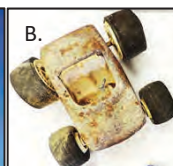
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29

Which of the following would be considered a cultural resource?

- A. Trail
- B. Toy
- C. Building
- D. Rock formation
- E. B & C only
- F. C & D only
- G. All of the above
- H. None of the above



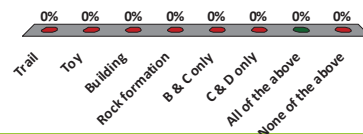
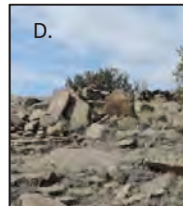
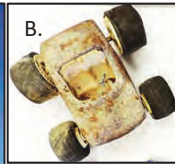
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30

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- E. B & C only
- F. C & D only
- G. All of the above
- H. None of the above



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31

While digging a tank ditch, you find an arrowhead and other stone chips. What should you do first?

- A. Call Range Control or the CRM immediately.
- B. Cover it back up and say nothing.
- C. Put the arrowhead in your pocket. It would be a nice addition to your collection.
- D. Stop all work immediately, and place a buffer around the area.

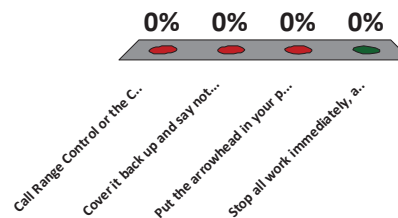
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32

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33

You cannot be prosecuted for unknowingly defacing an archaeological site on an Army installation.

- A. True
- B. False

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34

You cannot be prosecuted for unknowingly defacing an archaeological site on an Army installation.

- A. True
- B. False



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35

CULTURAL RESOURCES

POTENTIAL HAZARDS AND ENVIRONMENTAL CONCERNS

Cultural resources are remnants of past human activities that have cultural or historical value and meaning to a group of people. A resource can be thousands of years old, hundreds of years old, or from the more recent past. Examples include: rock art and carvings; archaeological sites; historic buildings, structures or objects; historic roads and trails; Native American sacred sites and traditional cultural properties; human burials; artifacts; and ruins. As a land manager, it is our duty to be good stewards, ensuring compliance with all environmental and cultural requirements, laws, and regulations. Violation of cultural resources protection laws can result in civil and criminal penalties, monetary fines, and imprisonment.

HANDLING PROCEDURES

☆	Coordinate land use with Range Control Operations to ensure you are in an approved area.	 <p>Pictured above are various cultural resources that have been recorded on Fort Carson and PCMS.</p>
☆	Observe posted signs, fencing, and Seibert marking that indicate restricted areas which may be off-limits to vehicles, digging, bivouacking, or other high impact activities.	
☆	Do not collect artifacts, including arrowheads and bottles. Do not disturb stone circles, rock mounds, ruins, or other cultural features. Do not touch or deface rock art, or scratch on rocks or objects of any kind.	
☆	Do not trespass in historic structures even when not marked.	  <p>Graffiti, as seen in the photograph above, can irreparably harm the integrity of a site. There is no way to remove the graffiti without doing further damage to the site. The yellow, red, and white Seibert markers indicate areas where vehicles, digging, or bivouacking are not allowed.</p>
☆	Report any signs of looting, graffiti, or other damage to a cultural site to Range Control Operations or Cultural Resources staff.	
☆	No graffiti anywhere, anytime.	
☆	If buried artifacts, bones, or other cultural items are found, stop work immediately, flag a protective buffer around the location of the discovery, and report the discovery to Range Control Operations or Cultural Resources staff.	

GENERAL INFORMATION

For additional information concerning cultural resources, contact the Fort Carson Cultural Resources Manager at 526-4484 or the PCMS Archaeologist at 503-6136.

Range Control Operations: Fort Carson 526-5698 / PCMS 526-6123 or 6130

Reference: [Fort Carson Regulation 200-1](#).

Soldiers who have been designated to the Observer-Controller Team for a brigade exercise must go through special training. This brief covers environmental considerations, including cultural resources, and is usually provided by the Fort Carson Cultural Resources Manager. It is adapted for each specific brigade exercise.

1/11/2021

IRON STRIKE OC TEAM BRIEF

ENVIRONMENTAL CONSIDERATIONS

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



TOPICS

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



WHAT IS A PROTECTED RESOURCE?

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-

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CULTURAL RESOURCE EXAMPLES



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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCE EXAMPLES

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CRITICAL INFRASTRUCTURE EXAMPLES

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



COMPLIANCE REQUIREMENTS FOR PROTECTED RESOURCES

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Best Practice:

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



PROTECTED RESOURCES MAP SYMBOLS: UNMARKED PROTECTED RESOURCE



Symbol:

Definition:

Caveats:

**Do not simply rely on the
observed Seibert markers and/or
fencing.**

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



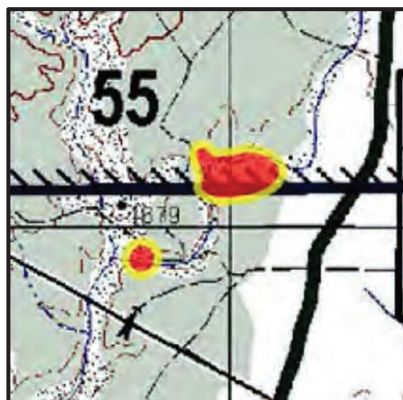
PROTECTED RESOURCES MAP SYMBOLS: MARKED PROTECTED RESOURCE

Symbol:

Definition:

Caveats:

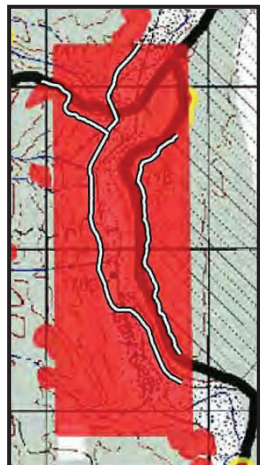
**Do not simply
rely on the observed Seibert
markers and/or fencing.**



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Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



PROTECTED RESOURCES MAP SYMBOLS: AUTHORIZED TRAVEL CORRIDOR



Symbol:

Definition:

Caveat:

**Stay on the
approved, existing corridor only.**

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



PHYSICAL PROTECTION MEASURES



Seibert Marker



Protection Fences with Restricted Access Signs



Boulders

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



INADVERTENT ENTRY / IMPACT

-
-
-

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCES GUIDANCE

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-
-
-

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCES GUIDANCE

- not
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Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



NATURAL RESOURCES GUIDANCE

-



This tree was approximately 200 years old.
 This was avoidable.



Stock tanks provide drinking water for wildlife.

-

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CULTURAL RESOURCES GUIDANCE

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CULTURAL RESOURCES GUIDANCE

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**You will not WRITE, PRINT, PAINT, STAMP,
 SCRATCH, PECK, OR CHALK ON ANY STONE
 SURFACES, BUILDINGS / STRUCTURES
 (HISTORIC OR MODERN), OR LATRINE
 WALLS!!!!!!**

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



IF YOU FIND ARTIFACTS, BONES, OR OTHER POSSIBLE CULTURAL ITEMS...

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



SPILL RESPONSE

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil

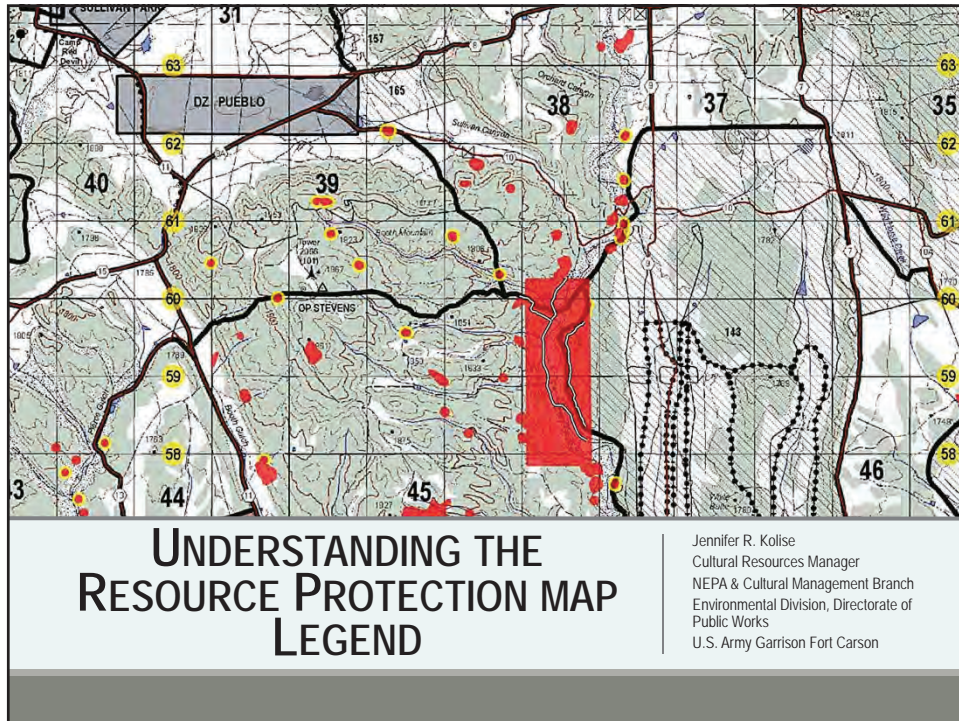


IRON STRIKE DIG REQUEST PROCESS

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil





WHAT IS A PROTECTED RESOURCE?

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NATURAL RESOURCE EXAMPLES



CULTURAL RESOURCE EXAMPLES



CRITICAL INFRASTRUCTURE EXAMPLES

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HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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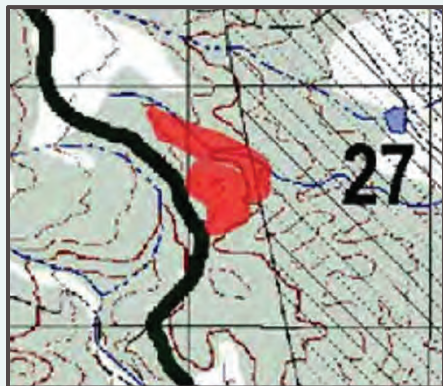


COMPLIANCE REQUIREMENTS

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Best Practice:

STANDARDIZED SYMBOL: UNMARKED RESOURCE



Symbol:

Definition:

Caveat:

**Do not simply
rely on the observed Seibert
markers and/or fencing.**

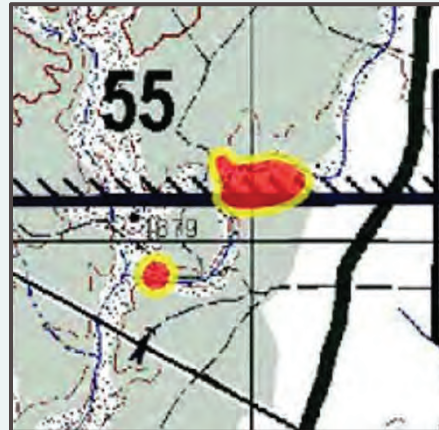
STANDARDIZED SYMBOL: MARKED RESOURCE

Symbol:

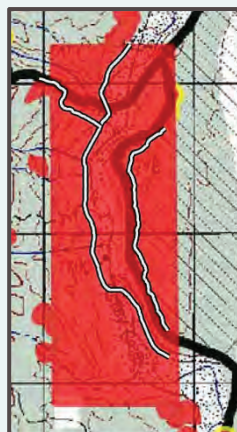
Definition:

Caveat:

Do not
simply rely on the observed
Seibert markers and/or
fencing.



STANDARDIZED SYMBOL: AUTHORIZED TRAVEL CORRIDOR THROUGH PROTECTED RESOURCE



Symbol:

Definition:

Caveat:

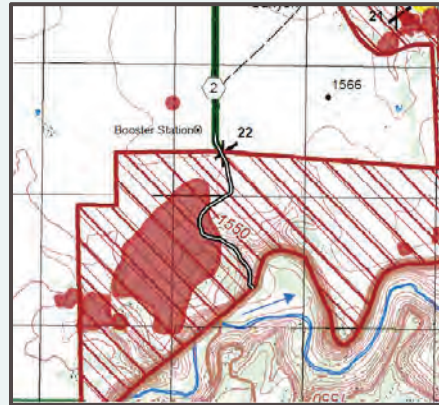
Stay on the
approved existing corridor
only.

STANDARDIZED SYMBOL: DISMOUNTED ONLY AREAS

Symbol:

Definition:

Caveat:



PHYSICAL PROTECTION MEASURES



Seibert Marker



Protection Fences with
Restricted Access Signs



Boulders

FISCAL YEAR (FY) 2021 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, 2021

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, 2020, through September 30, 2021, 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: <https://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. Fifteen 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 not been initiated for the proposed tamarisk control project within the Bent Canyon Wildland Fire footprint (2021-269).

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 was initiated on March 30, 2021. Via correspondence dated April 23, 2021 (HC #79539), the SHPO requested additional information about the construction of utility lines beyond the proposed tower's location, as well as requested a more quantifiable analysis of historic properties within the visual APE. Responses were also received from Crow Creek Sioux Tribe, Pawnee Nation of Oklahoma, Not 1 More Acre!, and Otero County Board of County Commissioners (BOCC). Crow Creek Sioux Tribe stated via correspondence dated March 31, 2021, that PCMS is outside of their area of interest. They only have an interest in northern Colorado. The Pawnee Nation of Oklahoma

agreed with the finding of effects. Not 1 More Acre! and the Otero County BOCC did not agree with the finding of effects. Follow-up consultation to address their concerns was conducted. No additional correspondence was received from either party regarding the finding of effects. Not 1 More Acre! did follow up with correspondence to FirstNet and USAG Fort Carson requesting an Environmental Assessment in accordance with the National Environmental Policy Act (NEPA) be completed.

A supplemental undertaking review packet was submitted to the SHPO, Tribes, and other consulting parties and interested parties on June 23, 2021. This update includes the APE for the utility line corridor, as well as the following: a description of what the Army & Air Force Exchange Service is and how it fits within the Army organization; a map of locations of other cellular towers along U.S. Highway 350 near PCMS; representative photographs of cellular towers of similar height and construction style along U.S. Highway 350 with photograph location map; significance criterion that qualifies a cultural resource for inclusion on the National Register of Historic Places; more detailed analysis of the visual effects to historic properties; and overview photographs from key locations with photograph location map. In correspondence dated July 22, 2021 (HC #79539), the SHPO noted that previously undocumented segments of 5LA5795 (Santa Fe Trail), 5LA8548 (Atchison, Topeka, and Santa Fe [ATSF] Railroad), and 5LA13462 (U.S. Highway 350) are within 0.25 miles of the proposed tower location. In addition, the SHPO had concerns with potential adverse visual effects to 5LA4434 and 5LA5795. While the Santa Fe Trail is located along the railroad and U.S. Highway 350, there are no visible ruts that have not been recorded and evaluated within the visual APEs. USAG Fort Carson is documenting and evaluating the unrecorded segments of 5LA8548 (ATSF Railroad) and 5LA13462 (U.S. Highway 350). Once the recording is completed, USAG Fort Carson will submit a response to the SHPO. Responses were also received from the Northern Cheyenne Tribe, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all agreed to the finding of effects. Section 106 consultation is ongoing.

- CF2020-008 Bent Canyon Wildland Fire After Action Inspection: Survey fieldwork is ongoing. Once the survey is complete, a memorandum for record (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: The inspection of all protected resources marked during this project has not been completed. 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.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRM. Two projects are a review of Programmatic Environmental Assessments, one is a request for information by the Colorado State Land Board, and one is the subdivision of training area boundaries for access management purposes.

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: <https://www.carson.army.mil/organizations/dpw.html>
- Cultural Resources Awareness Video – available online at: <https://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 December 12, 2020 (HC #58731, HC #63877, and HC #65747), the SHPO requested USAG Fort Carson conduct a “quantifiable analysis of the effectiveness of the training” to help determine gaps in the training provided to Soldiers, Civilians, and other users. The SHPO also requested information on the types of training provided for different levels of personnel.

Enclosure 3 includes the SHPO’s December 12, 2020, letter, and the USAG Fort Carson’s response to the SHPO dated January 8, 2021.

C. Brigade Training Exercises

No brigade training exercises occurred at PCMS during the reporting period.

D. Inadvertent Entries and/or Impacts to Historic Properties

The following summarizes inadvertent entries and/or impacts to historic properties:

- CF2021-008 Storm Damage at Red Rocks Ranch: A hail-producing thunderstorm, which occurred at some point during June 11-13, 2021, caused damage to the Red Rocks Ranch (5LA5816). This damage was noted by the Operations & Management staff on June 15, 2021. The SHPO was notified via email on June 17, 2021. Damage to this historic property includes broken windows, dented metal roofing and gutter

system, and damaged exterior plaster at the Main Residence (Feature 1); dented metal roofing on the shed (Feature 2), bunkhouse (Feature 6), barn/shed (Feature 7), and barn (Feature 8); dented metal roofing and gutter system of the bunkhouse (Feature 5); dented metal roof; collapsed bench and broken exterior light near the garage (Feature 4); and development of erosional rills. The MFR and supporting documentation are forthcoming.

- CF2021-009 Van Bremer Flood Assessment: In June of 2021, a major flood event occurred along the Van Bremer Arroyo, which runs east-west along the southern portion of PCMS. Upon preliminary inspection, the flood resulted in downed Seibert markers at several sites, as well as damage to other sites. Therefore, a full assessment of all protected resources along the Van Bremer Arroyo is being conducted. The SHPO was notified via email on June 22, 2021. The MFR and site documentation is forthcoming.
- CF2021-010 Removal of Downed Tree at Sharp's Ranch: On July 27, 2021, the Cultural Resources Manager and PCMS Archaeologist were notified by the PCMS Facility Manager of a downed tree at Sharp's Ranch. The tree did not fall on any of the main features of the ranch. Documentation and Section 106 consultation for the removal of the tree is forthcoming.

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 #2021-01076: The wildland fire started within the cantonment on March 31, 2021, with fire suppression activities concluding on the same day. There are no historic properties within the wildland fire footprint.
- Incident #2021-01247: The wildland fire started within the cantonment on April 14, 2021, with fire suppression activities concluding on the same day. There are no historic properties within the wildland fire footprint.
- Incident #2021-01332: The wildland fire started near the PCMS Airstrip on April 21, 2021, with fire suppression activities concluding on the same day. There are no historic properties within the wildland fire footprint.
- Incident #2021-02212: The wildland fire started near the PCMS Airstrip on July 8, 2021, with fire suppression activities concluding on the same day. There are no historic properties within the wildland fire footprint.

- Incident #2021-02525: The wildland fire started near the PCMS Airstrip on August 7, 2021, with fire suppression activities concluding on the same day. There are no historic properties within the wildland fire footprint.

G. Amendment

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

On September 28, 2021, USAG Fort Carson notified the ACHP, SHPO, Tribes, and other consulting and interested parties of our intention to implement the Army Alternate Procedures (AAP), and requested point-of-contact information for those interested in collaborating with USAG Fort Carson in the development of a Historic Properties Component. Implementation of the AAP would supersede the PCMS PA.

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 3rd 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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Date: 2021.11.08 08:35:00 -07'00'

Wayne Thomas
Chief, NEPA and Cultural Management Branch

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Date: 2021.11.10 10:18:12 -07'00'

Carlos Rivero-deAguilar
Chief, Environmental Division

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Date: 2021.11.12 17:44:05 -07'00'

Joe Wyka
Director, Public Works

ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY21 REPORTING PERIOD (OCTOBER 1, 2020 THROUGH SEPTEMBER 30, 2021) 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
2021-013 Alpha Company, 52 nd Brigade Engineer Battalion (BEB) Excavation Training Request, Training Area (TA) 7, PCMS	n/a	PCMS Numbered TAs	PC B3	10/27/2020	
2021-074 Prairie Dog Control at Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	BE I.B2 FC D2b PC A3b PC B4b2	12/14/2020	<p>Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides.</p> <p>At Fort Carson, treatments will take place at Butts Army Airfield; EFMP training complex; Minick Ave; Ranges 11, 24, 29, 45, 63/65, 104, 105, 109, 111, 115A, 115B, 117, 119, 121C, 139, 143, 145, 147/147A, 151, 153, & 155; Ammunition Supply Point; and Turkey Creek Complex.</p> <p>At PCMS, treatments will occur at 11A MOUT site (4 Corners), 3A MOUT site; and PCMS Airfield.</p> <p>Section 106 consultation was completed in July 2019 for the Turkey Creek Complex as part of NEPA Project No. 2019-168. See Enclosure 1, Table 2 of the Fort Carson Built Environment PA for more information.</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
2021-076, 2021-150, 2021-237, & 2021-294 Quarterly Record of Environmental Consideration (REC) for Training	DPT21QRT2 DPT21QRT3 DPT21QRT4 DPR22QRT1	Main Post Downrange Fort Carson PCMS Cantonment 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	12/14/2020 3/15/2021 6/24/2021 9/23/2021	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 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 Directorate of Plans, Training, Mobilization, and Security (DPTMS) for planning purposes.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-077 Integrated Training Area Management (ITAM) Program Projects in TAs 27 & 30, Fort Carson, and TAs 7, 10, & 10, PCMS	DPT21-004	Downrange Fort Carson PCMS Numbered TAs	FC D1d FC D2a FC D2b PC B4b1 PC B4b2	12/15/2020	<p>These projects support safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events.</p> <p>Task 20-505 is the rehabilitation of Dillingham trail in TAs 7 & 14 of PCMS. Proposed work includes trail out-sloping and adding water bars.</p> <p>Task 21-166 is the rehabilitation of an existing elevated maneuver trail in TA 30 of Fort Carson. Proposed work includes adding a culvert at 2 feet deep; raising the embankment by 1 foot; widening/deepening and armoring the overflow; and installing 2 check dams and water bars.</p> <p>Task 21-174 is the decommissioning of an existing maneuver trail in TA 30 of Fort Carson. The old erosion control dam will be removed.</p> <p>Task 21-190 is the rehabilitation of an existing maneuver trail in TA 27 of Fort Carson. Proposed work includes trail out-sloping; adding water bars and armored diversions; crowning; and clearing vegetation for 150 feet along both sides of the trail.</p> <p>Task 22-554 is the rehabilitation of several existing elevated maneuver trails in TAs 7 & 10 of PCMS. Proposed work include reseeding over 80 acres to address erosion and noxious weed issues.</p> <p>Task 21-192, which is the creation of a new maneuver trail, required Section 106 consultation. See Enclosure 1, Table 2 of the Fort Carson Downrange PA for more information.</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
2021-078 ITAM Program Projects in TA 31, Fort Carson, and TAs 2 & 7, PCMS	DPT21-005	Downrange Fort Carson PCMS Numbered TAs	FC D2a PC B4b1 PC B4b2	12/15/2020	<p>These projects support safe and sustainable training by intercepting and slowing supercritical flow from large rainfall events.</p> <p>Task 21-155 is the rehabilitation of an existing elevated maneuver trail in TA 31 of Fort Carson. Proposed work includes replacing the existing 18-inch-diameter culvert with a 4-foot-diameter culvert at 2 feet deep; widening and armoring the overflow; bank sloping; and installing a scour pool.</p> <p>Task 21-164 is the rehabilitation of an existing elevated maneuver trail in TA 31 of Fort Carson. Proposed work includes replacing the existing culvert with a 42-inch oval arch culvert at 2 feet deep; widening and armoring the overflow; bank sloping; and installing a scour pool.</p> <p>Task 22-552 is the rehabilitation of several elevated maneuver trails in TA 2 & 7 of PCMS. Proposed work include reseeding to address the erosion and noxious weed issues.</p>
2021-090 Implement Fuels Management Projects, Fort Carson & PCMS	DPW21-018	Main Post Downrange Fort Carson PCMS Numbered TAs PCMS Lettered TAs	BE I.B3 FC D2b PC B4b2 PC C3b3	1/21/2021	<p>Several of the proposed locations were also reviewed under NEPA Project No. 2018-001, 2018-004, 2018-119, 2018-205, 2018-333, 2019-259, 2020-054, 2020-073, & 2020-309.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p>
2021-098 Bravo Company, 52 nd BEB Excavation Training Request, TA 7, PCMS	n/a	PCMS Numbered TAs	PC B3	1/22/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-111 2-12 Infantry (IN), 2 nd Stryker Brigade Combat Team (2SBCT) Excavation Training Request, TA 13, PCMS	n/a	PCMS Numbered TAs	PC B3	2/8/2021	
2021-125 FY2021 Invasive Species Treatment, Fort Carson and PCMS	DPW21-021	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	2/25/2021	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.
2021-155 Explosive Ordnance Disposal (EOD) Team of the Year Training Event, PCMS	n/a	PCMS Numbered TAs PCMS Lettered TA	PC B1 PC B2 PC C1	3/29/2021	Information has been provided to the proponent for avoidance of protected cultural resources.
2021-169 Fence and Vegetation Removal Project, PCMS	PCM21-001	PCMS Cantonment	PC A2d PC A3b	3/30/2021	Proposed work includes: remove fencing; and clear bushes, shrubs, and trees that are within 100 feet of the south taxiway centerline at PCMS Airfield.
2021-202 U.S. Air Force (USAF) Excavation Training Request, Cantonment and Range 9, PCMS	n/a	PCMS Cantonment PCMS Numbered TAs	PC A1c PC B3	5/4/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2021-203 Repair Runway and Taxiway, PCMS	PCM21-002	PCMS Cantonment	PC A2b	5/7/2021	Proposed work includes grading the surface to disperse the gravel; remove and roll the rutting formed from previous passes to improve compaction; survey for grade and add approximately 30 tons of material that will then be graded and compacted on the North Taxiway; correct depression in transition from the runway to North Taxiway by adding approximately 30 tons of material, grade level and compact; and grade/compact the entire runway.
2021-279 Install AC/DC Power and Grounding in Communication Nodes, Fort Carson & PCMS	DIR21-008	Main Post Downrange Fort Carson PCMS Cantonment	BE I.A2 FC D1b PC A2b	8/31/2021	The Installation Campus Area Network Modernization (ICANMOD) project is an Army-directed mandate to replace and upgrade all legacy wired network infrastructure with new equipment in Fort Carson and PCMS. The AC/DC electrical, grounding, and Trimm Panel installation will occur in Bldgs. 319, 1014, 1550, 2358, 2435, 6256, 7500, 8008, 9535, & 9545 at Fort Carson and Bldg. 310 at PCMS.
2021-298 Construct Gate-Barricade on Main Supply Route (MSR) 1, PCMS	PCM21-004	PCMS Cantonment	PC A2a	9/30/2021	Proposed work include installing a swing gate on MSR 1 in order to close access to MSR 1 during military training.

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
2021-269 Tamarisk Control Project in Bent Canyon Wildland Fire Footprint, PCMS	DPW21-052	PCMS Lettered TAs	8/3/2021	n/a	Inventory and evaluation of historic properties is required since the proposed project location is within an unsurveyed area of PCMS. Survey of the APE has been initiated, but Section 106 consultation has not yet been initiated.

Table 3. Other Non-Exempted Undertakings

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2021-006 Review of the Programmatic Environmental Assessment (PEA) for the Fielding of the Maneuver Short Range Air Defense (M-SHORAD) System	n/a	n/a	108/2020	This is a review of the preliminary draft PEA to analyze the environmental and socioeconomic impacts with the fielding of the new M-SHORAD system. Fort Carson is one of the installations proposed to receive this new system. If Fort Carson is chosen, the required construction and training needs associated with the M-SHORAD system will be further analyzed.
2021-011 & 2021-044 Review of the Programmatic Environmental Assessment (PEA) for the Armored Multi-Purpose Vehicle (AMPV), Fort Carson	n/a	n/a	10/22/2020 11/6/2020	2021-011 & 2021-044 is a review of the 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. Undertaking has been previously reviewed under NEPA Project No. 2020-299.
2021-270 Colorado State Land Board Oil & Gas Lease Sale within 2 Miles of PCMS	n/a	n/a	8/4/2021	The Colorado State Land Board informed USAG Fort Carson of proposed oil & gas lease sales within 2 miles of PCMS, and requested information on potential concerns. The proponent has been notified that they must coordinate with CRM, since the construction of oil & gas infrastructure on the land parcels proposed for lease sale could potentially cause indirect and cumulative adverse effects to historic properties located on PCMS.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2021-284 Subdivision of TAs 7 & 10 at PCMS	n/a	PCMS Numbered TAs	9/8/2021	The TA 7 will be subdivided into TA 7a, 7b, and 7c, and TA 10 will be subdivided into TA 10a, 10b, and 10c. This subdivision will facilitate access management to these TAs during military training, operational support activities, and public recreation. No boundaries or allowed activities have changed within these areas.

**ENCLOSURE 2:
PCMS PA TASK TRACKER
(CURRENT AS OF SEPTEMBER 30, 2021)**

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 has been completed. CRM is awaiting submission of the preliminary draft technical report and site documentation. Project is ongoing.</p> <p>FY20: Contract awarded in September 2019 to conduct a traditional use study of the Hogback. Site visits are scheduled to begin in October of 2021.</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>Protection strategies have been implemented at the “Needs Data Sites.”</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 virtually on January 27, 2021. In attendance were representatives from the Jicarilla Apache Nation, Pawnee Nation of Oklahoma, Rosebud Sioux Tribe, Southern Ute Indian Tribe, Standing Rock Sioux, and Ute Mountain Ute.</p>

Stipulation	Action	Duration	Date Required	Remarks
III.A	Implement site protection measures		04/22/2017	415 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.
III.B	Propose amended site protection measures and monitoring frequencies	As needed	n/a	No proposed changes during reporting period
III.D	Provide training vehicles/aircraft with means of knowing site locations	1 year after signing	04/22/2015	Completed; update as necessary
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections. FY21: Contract awarded in April 2021 to assist with monitoring activities.
V.A	Implement cultural awareness training of all personnel involved in the execution of undertakings	Annually	n/a	Cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians, and contractors.
VI.C	Annual meeting with consulting parties	Annually	NLT Feb. 15 th	Consultation meeting was held virtually on January 13, 2021. In attendance were representatives from the ACHP, Colorado SHPO, Cheyenne & Arapaho Tribes of Oklahoma, City of Colorado Springs, Colorado Preservation, Inc., Colorado Council of Professional Archaeologists, Comanche National Grasslands, Las Animas County Commissioners, Northern Arapaho Tribe, Otero County Commissioners, Pawnee Nation of Oklahoma, Southern Ute Indian Tribe, Standing Rock Sioux, and Ute Mountain Ute Tribe.
VII.AG	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017. The CRM is currently drafting the 5-year ICRMP Update.

ENCLOSURE 3:
SHPO CORRESPONDENCE ON FY20 ANNUAL REPORT



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

Re: Fiscal Year (FY) 2020 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 correspondence dated November 13, 2020 and received by our office on November 16, 2020 regarding review of the Fiscal Year 2020 (FY 20) 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 (DRFC), Attachment 3—Pinon Canyon (PCMS)]. Below, we describe a few general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Similar to our comments on the FY 2018 and 2019 annual reports, our first general comment concerns the training exercises conducted by USAG Fort Carson. Our previous comments noted that military use of the landscape has the potential to adversely affect historic properties. While we agreed with the minimization efforts implemented, we requested that USAG Fort Carson initiate consultation with our office on mitigating adverse effects. In your December 2019 and October 2020 responses, you acknowledged that the trainings were causing adverse effects and that the Programmatic Agreements (PAs) require consultation to resolve those effects according to 36 CFR 800.6. Your responses, however, also noted that USAG Fort Carson only considers adverse effects on a “case-by-case basis” and that you “do not agree to an overarching approach to mitigation.”

While we appreciate the acknowledgement of the need to resolve adverse effects and recent attempts to mitigate adverse effects, we continue to argue that military use of the landscape has the potential to adversely affect historic properties. The development of resource strategies that seek to mitigate effects to types or groupings of resources would comprise an important and effective approach to mitigating some of these potential adverse effects. The cumulative scale and extent of impacts caused by the training exercises will result in the loss of a significant opportunity to study the relationship and association of these resources on a



larger scale. Further, resources such as traditional cultural properties may be considered on a broader scale than an individual feature or archaeological site. The relationship between these various resources is important to understanding the area's past and the cultural landscape may comprise an important aspect of a resource's significance. Without the development of an effective resource strategy, important information may be lost due to cumulative effects of these exercises and not all of the adverse effects may be appropriately mitigated. We request that consultations regarding resolution of adverse effects continue and that USAG Fort Carson continues its commitment to resolve adverse effects.

We also continue to argue 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 effectively reducing the frequency of inadvertent entries. Thirty nine sites were entered in 2010, 22 sites were entered in 2013, 48 sites were entered in 2015, 45 sites were entered in 2017, and 65 sites entered during 2018. While we appreciate the additional information provided in your 2019 and 2020 correspondences and are encouraged to hear about potential successes and that the Cultural Resources Program staff have had increased interactions and integration into military exercises, we note that resources continue to experience inadvertent entries. An example consists of 5PE.2966 that experienced six inadvertent entries, one of which occurred in 2019.

Your December 2019 correspondence notes that feedback is sought regarding the training materials and that you "regularly review the training materials and methods of dissemination to achieve maximum results." The correspondence, however, does not discuss how this is conducted. A quantifiable analysis of the effectiveness of the training would help in determining gaps in the training program. This should include quantitative data and could include an analysis of the training retention rate between different levels of personnel. A study could also determine the reach of different training formats. Further, we request information on the type of training provided for different levels of personnel. We continue to note from our FY 19 response that training emphasized for both high and low ranking personnel that incorporates varying methods and formats as well as information oriented to different groups will help ensure the efficacy of the program. Training and resources oriented towards the variety of different military exercises will also help ensure the effectiveness of the program.

We understand that additional minimization and avoidance measures are being employed including the use of Siebert markers. We continue to support the use of Siebert markers and other measures. We, however, also recommend studying the effectiveness of the measures employed. Using 5PE.2966 as an example, inadvertent entries occurred at the site despite the presence of markers that surround the site. We recommend studying how these measures fail and determining potential improvements or additional measures to avoid and minimize inadvertent entries.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Matthew Marques, Section 106 Compliance Manager, at (303) 866-4678 or matthew.marques@state.co.us, Mitch Schaefer, Section 106 Compliance Manager, at (303) 866-2673 or mitch.schaefer@state.co.us, or Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



Attachment 1:

SHPO Comments on FY 2020 Fort Carson Built Environment PA Annual Report (HC# 58731)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

As a minor point of clarification, the 2019-379 Forest Thinning, Camp Falcon and Training Area 5 was reviewed under HC#76914 (not 76752). Nevertheless, our office did concur the undertaking would result in no historic properties affected in a letter dated December 18, 2019.

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. Dispute Resolution

No comments.



Attachment 2:

SHPO Comments on FY 2020 Down Range Fort Carson PA Annual Report (HC# 63877)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2019-134, 2019-163, 2020-088, 2020-249, and 2020-294: Our office looks forward to consultation on these undertakings.

III. Action Updates

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

I.C: We appreciate the development of draft research designs to evaluate the eligibility of resources determined as “needs data” and the opportunity to review the designs. We, however, note that additional research is needed for additional archaeological sites. In particular, we note that research is needed for the Turkey Creek Rock Art Historic District.

As stated in our response to the FY 19 annual report, 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.

Your October 2020 letter responded to our comments that you will collaborate with tribes in the near future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We agree with these recommendations and look forward to further consultation regarding the district and any potential traditional cultural properties.

III.E: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources, sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.



VI.B: We note that earlier this year we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. Has this been developed or will this be developed by the contractor? We look forward to reviewing the scope of work and the results of this study.

B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson's October 2020 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.

What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be aware of and take responsibility to comply with regulations and laws to protect cultural resources. Quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

C. Inadvertent Entries and/or Impacts to Historic Properties

We appreciate USAG Fort Carson's efforts to document inadvertent entries and cumulative effects to historic properties. We, however, note that the exercises continue to inadvertently enter historic properties and recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

D. Inadvertent Discoveries

No comments.

E. Emergency Response

No comments.

F. Amendment

No comments.

G. Dispute Resolution

No comments.

H. Other

We look forward to the development of a memorandum of agreement to resolve adverse effects to 5PE.2966.



Attachment 3:
SHPO Comments on FY 2020 PCMS PA Annual Report (HC# 65747)

I. Exempted Undertakings

No comments.

II. Non-Exempted Undertakings

2019-285: We look forward to consulting on this undertaking.

2020-299: Will the new vehicles cause different impacts or increase the scale of impacts to historic properties? Will training, resources, minimization measures, and avoidance measures need to be altered to address the use of the new vehicle?

III. Action Updates

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

I.B: As stated in our response to the FY 19 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 correspondence, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

We appreciate the development of draft research designs and the opportunity to review the designs. We look forward to reviewing the results of the fieldwork. We also look forward to reviewing the results of your Hogback study.

III.A: We recommend analyzing the effectiveness of the proposed avoidance and minimization measures. Please refer to our letter for additional detail.

III.D: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

B. Cultural Resource Awareness Training

Please refer to our comments in our letter regarding trainings.

C. Brigade Training Exercises

Please refer to our comments in our letter regarding trainings and resources provided to personnel as well as comments regarding avoidance and minimization measures.



D. Inadvertent Entries and/or Impacts to Historic Properties

We look forward to reviewing the documentation concerning the Bent Canyon Wildland Fire and inadvertent entries at 5LA.4750, 5LA.6108, and 5LA.13436. We also 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. Dispute Resolution

No comments.

I. Other.

We look forward to consultation regarding the resolution of adverse effects.



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

January 8, 2021

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

Dear Mr. Turner:

Thank you for your correspondence dated December 16, 2020, concerning your review of the fiscal year (FY) 2020 annual reports for the three U.S. Army Garrison (USAG) Fort Carson 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.

Fort Carson has been an active duty Army installation since 1942, and has been its current size since 1965. It has always been home to armored and infantry brigades, and is now home to Stryker and Combat Aviation brigades as well. Training occurs daily at Fort Carson; this includes mounted and dismounted maneuvers, aviation training, excavation training, and live-fire training. Due to this high operation tempo and the types of training involved, we did consult with your office and the Advisory Council on Historic Preservation (ACHP) during the development of the *Programmatic Agreement on Military Training and Operational Support Activities at Down Range Fort Carson* (Fort Carson Downrange PA) on an "overarching approach to mitigation" for the resolution of potential adverse effects to historic properties. The Fort Carson Cultural Resources Manager (CRM) also consulted with the Directorate of Plans, Training, Mobilization, and Security (DPTMS) to determine which areas within downrange Fort Carson are used heavily for training and better understand what types of training occur in them. As a result, this PA included language to implement mitigation measures to resolve potential adverse effects at 22 resources and unrecorded historic properties within areas exempted from cultural resources survey.

All signatories recognized upfront that inadvertent entry and/or other impacts may occur at historic properties, and consequently the Fort Carson Downrange PA included a very robust inspection and monitoring program. Since the inception of the program in 2014, inadvertent entries related to military training have been identified and documented at 8 of the 178 protected resources within the downrange area: 5EP161, 5EP1177, 5EP2524, 5EP5974, 5EP7602, 5PE793, 5PE2966, and 5PE8157. Site 5PE2966 has been entered three separate times (not six as stated in your letter) by

military tactical vehicles. Given the multiple entries, we determined cumulative adverse effects were occurring at this site.

Given that an overarching approach to mitigation was agreed upon by your office, the ACHP and USAG Ft Carson during the development and execution of the Fort Carson Downrange PA, and considering the high operational tempo of military training downrange and low number of protected resources entered since protection measures and cultural resources awareness training have been implemented, and considering also, that only 2 of the 178 downrange protected resources have been adversely affected as a result of these recent entries, we do not agree additional broad scale mitigation is necessary to mitigate potential direct, indirect, and cumulative adverse effects related to military use of downrange. As stated in our October 2020 letter, we will continue to consult on a case-by-case basis when potential adverse effects to historic properties at Fort Carson are identified.

As also stated in our October 2020 letter, USAG Fort Carson does 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. We have been actively working to develop mitigation plans for 36 historic properties at PCMS that were adversely affected or were entered during multiple exercises, as discussed during past annual programmatic agreement meetings with your office and consulting/interested parties. It is expected these mitigation plans will help inform our decision on the best strategy to employ. Based on that, we will be ready to discuss various types of mitigation with your office, Native American Tribes, and other consulting/interested parties in the near future as we continue consultation to resolve for adverse effects. We can share at this point that we are looking at strategies that seek to mitigate effects to the largest number of resources perhaps by types or groupings.

Please be informed that we agree with your statement that traditional cultural properties should be considered on a broader scale and not just at the individual feature or site level. This is one of the reasons a traditional use study of the Hogback is being completed. Also, we regularly consult with culturally affiliated Native American Tribes to identify, interpret, and evaluate these types of resources.

On a related matter, we would like to reiterate, as explained in our December 2019 letter, our opinion is one should not use quantitative data alone to assess the effectiveness of our cultural resources awareness training program. We continue to feel that comparing different brigade training exercises to arrive at conclusions on the program effectiveness is flawed and should not be used to judge it. We remain hopeful that you will review again the information in that letter to arrive at the same conclusion.

We firmly believe that what speaks to the success of the cultural resource awareness training is the open communication and cooperative planning lines established with the 4th Infantry Division leadership, as well as with other key Garrison

organizations like DPTMS. 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. Cultural Resources Program staff continually work with the 4ID's geospatial staff to update and ensure protected resources are always included on paper and digital maps used by units during training. (Enclosure 4 includes examples of the cultural resources awareness training and other materials created by USAG Fort Carson). Furthermore, each directorate, brigade, battalion, company, and contractor have designated Environmental Protection Officers (EPOs). This individual is the point-of-contact for environmental matters and the primary contact for fulfilling the unit's environmental responsibilities. EPOs also advise the Commander or Director about significant environmental aspects and impacts, and serve as liaisons between the unit and the Environmental Division. Newly designated EPOs must take a 40-hour certification course, which includes cultural resources awareness training. At the end of the course, the EPOs are tested and certified. EPOs also take an 8-hour refresher course annually.

For your situational awareness, the Department of Army has developed an organization (Training and Doctrine Command Culture Center), which is responsible for developing and delivering cultural resources awareness training to all Army leaders, including 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, 719-744-6640.

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

As a minor point of clarification, the 2019-379 Forest Thinning, Camp Falcon and Training Area 5 was reviewed under HC#76914 (not 76752). Nevertheless, our office did concur with the undertaking would result in no historic properties affected in a letter dated December 18, 2019.

USAG Response: The subject line on your letter stated the undertaking was reviewed under HC #76752 (see Figure 1). We will update our files if this is indeed the incorrect project review number. Thank you.

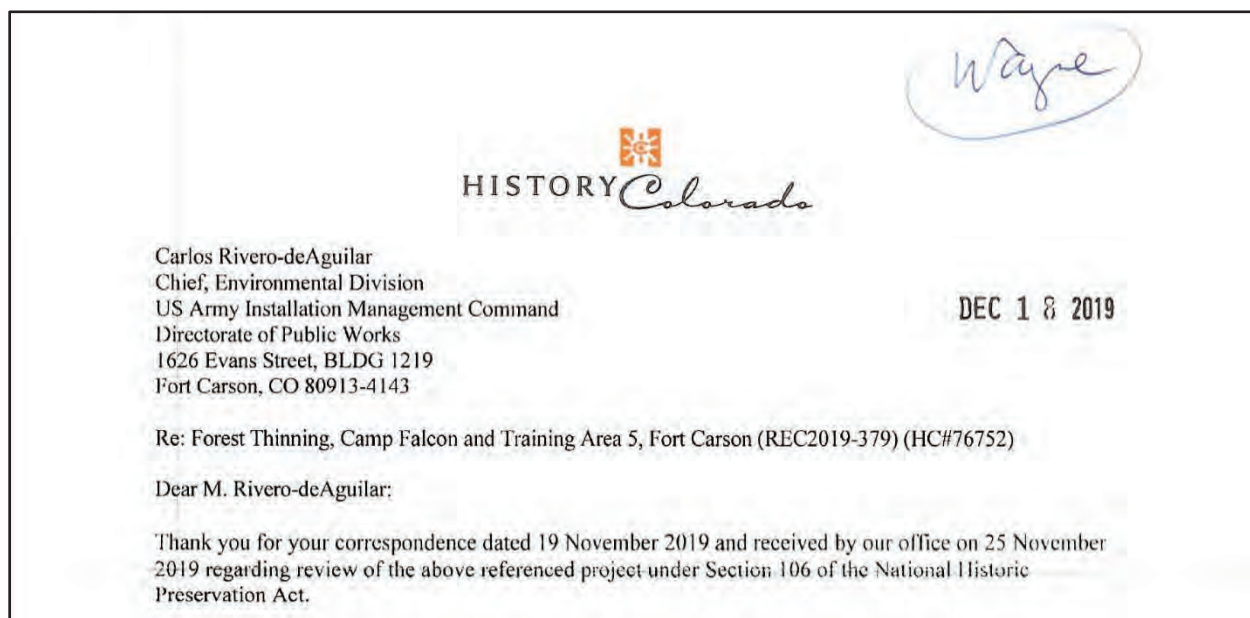


Figure 1. Note subject line states 2019-379 Forest Thinning, Camp Falcon and Training Area 5, Fort Carson was reviewed under HC #76752 (not HC #76914).

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.

USAG Response: 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, 2019-163, 2020-088, 2020-249, and 2020-294: Our office looks forward to consultation on these undertakings.

USAG Response: Thank you for your comment. Below is an update to the consultation status for these undertakings:

- 2019-134: Section 106 consultation has not been initiated.
- 2019-163: Section 106 consultation has been completed for 2019-163 Installation of Three-Phase Electrical to Range 123. The SHPO concurred with the finding of “no adverse effects to historic properties” via correspondence dated December 1, 2020 (HC #75708).
- 2020-088 / 2020-294: Section 106 consultation will be initiated once the Cultural Resources Manager has received all requested information from the project proponent.
- 2020-249: Section 106 consultation will be initiated once the Cultural Resources Manager has received all requested information from the project proponent.

III. Action Updates

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

I.C: We appreciate the development of draft research designs to evaluate the eligibility of resources determined as “needs data” and the opportunity to review the designs. We, however, note that additional research is needed for additional archaeological sites. In particular we note that research is needed for the Turkey Creek Rock Art Historic District.

As stated in our response to the FY 19 annual report, USAG 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.

Your October 2020 letter responded to our comments that you will collaborate with tribes in the near future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We agree with these recommendations and look forward to further consultation regarding the district and any potential traditional cultural properties.

USAG Response: Thank you for your comment. We look forward to working with you on this project.

III.E: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources, sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

USAG Response: This comment has been addressed in the body of the letter.

VI.B: We note that earlier this year we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. Has this been developed or will this be developed by the contractor? We look forward to reviewing the scope of work and the results of this study.

USAG Response: Once the finalized scope of work for the Historic Mining Context Study has been completed, you will have an opportunity to review and comment it. The tasks outlined in the draft scope that you reviewed have not changed.

B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson’s October 2020 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.

What training is being given to those above the unit level? All command positions (lieutenant, captain, lieutenant colonel, colonel, major general, etc.) should be aware of and take responsibility to comply with regulations and laws to protect cultural resources. Quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

USAG Response: 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 and cumulative effects to historic properties. We, however, note that the exercises continue to inadvertently enter historic properties and recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

USAG Response: 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.

H. Other

We look forward to the development of a memorandum of agreement to resolve adverse effects to 5PE.2966.

USAG Response: Thank you for your comment. We also look forward to working with you and other consulting parties in the development of a memorandum of agreement to resolve adverse effects at this site.

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

2019-285: We look forward to consulting on this undertaking.

USAG Response: Thank you for your comment.

2020-299: Will the new vehicles cause different impacts or increase the scale of impacts to historic properties? Will training, resources, minimization measures, and avoidance measures need to be altered to address the use of the new vehicle?

USAG Response: The new vehicle operates doctrinally the same as the vehicle it will replace. There will be no change to the type or scale of impacts to historic properties. Training, minimization measures, and avoidance measures will not need to be altered to address the use of the new vehicle.

III. Action Updates

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

I.B: As stated in our response to the FY 19 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 correspondence, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

USAG Response: 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.

We appreciate the development of draft research designs and the opportunity to review the designs. We look forward to reviewing the results of the fieldwork. We also look forward to reviewing the results of your Hogback study.

USAG Response: Thank you for your comment.

III.A: We recommend analyzing the effectiveness of the proposed avoidance and minimization measures. Please refer to our letter for additional detail.

USAG Response: This comment has been addressed in the body of the letter.

III.D: We appreciate the response provided in your October 2020 correspondence. We, however, recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on an annual basis. Understanding deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

USAG Response: This comment has been addressed in the body of the letter.

B. Cultural Resource Awareness Training

Please refer to our comments in our letter regarding trainings.

USAG Response: This comment has been addressed in the body of the letter.

C. Brigade Training Exercises

Please refer to our comments in our letter regarding trainings and resources provided to personnel as well as comments regarding avoidance and minimization measures.

USAG Response: This comment has been addressed in the body of the letter.

D. Inadvertent Entries and/or Impacts to Historic Properties

We look forward to reviewing the documentation concerning the Bent Canyon Wildland Fire and inadvertent entries at 5LA.4750, 5LA.6108, and 5LA.13436. We also look forward to continued consultation to resolve the effects of previous training exercises.

USAG Response: Thank you for your comment. As a status update, all known protected resources within the Bent Canyon Wildland Fire footprint have been inspected, and site documentation has been updated. Once the site documentation has been reviewed, it will be forwarded to your office. Approximately 134 acres have been surveyed and 12 newly identified sites recorded. A technical report of investigations

and all associated documentation will be forwarded to your office when the survey has been completed.

The PCMS Archaeologist is currently verifying the site marking contractor's work. All inadvertent entries will be documented (to include 5LA4750, 5LA6108, and 5LA13436) and an after action report submitted.

E. Inadvertent Discoveries

No comments.

F. Emergency Response

No comments.

G. Amendment

No comments.

H. Dispute Resolution

No comments.

I. Other

We look forward to consultation regarding the resolution of adverse effects.

USAG Response: Thank you for your comment. We also look forward to working with you to resolve adverse effects that have resulted from these past brigade exercises.

Enclosure 4:
Examples of Cultural Resources Awareness Training Materials



Cultural Resources Management

WHAT YOU NEED TO KNOW AS AN ENVIRONMENTAL PROTECTION OFFICER

Course Objectives

You will learn:

1. What are cultural resources?
2. Why is it important to protect cultural resources?
3. What are the legal requirements?
4. What are your responsibilities?
5. Where can you learn more?



Fort Carson Cultural Resources Management Program

Mission:

"To support military training requirements, achieve regulatory compliance, and ensure stewardship responsibilities are met."



Goals:

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

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Fort Carson Cultural Resources Management Program

Objectives:

- Provide accurate data regarding access restrictions
- Monitor cultural resources for impacts
- Implement protective measures
- Implement conservation measures
- Integrate cultural resources management with Installation operations
- Consult with external stakeholders
- Sustain public outreach



Tribal representatives discuss the importance of a rock art panel.

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4

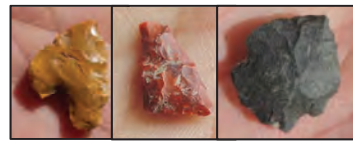
What are Cultural Resources?

Definition:

Non-renewable remnants of past human activities that have cultural or historical value and meaning to a group of people or a society

Or simply:

The stuff we leave behind



Cultural resources can be thousands of years old, hundreds of years old, or from the more recent past.

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Cultural Resources Examples:



- Rock art, i.e. petroglyphs (carvings) and pictographs (paintings)
- Archaeological sites
- Historical buildings, structures, and objects
- Historical roads and trails
- Sacred sites and traditional cultural properties
- Human burials
- Artifacts
- Ruins



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Fort Carson's Cultural Resources

Fort Carson (as of August 2017):

- 2,385 Cultural Resources
- 1 Listed National Register District
- 133 Eligible
- 68 Needs Data
- 2,165 Not Eligible
- 18 No Official Determination



PCMS (as of August 2017):

- 6,248 Cultural Resources
- 573 Eligible
- 660 Needs Data
- 4,999 Not Eligible
- 16 No Official Determination



Complex and Simple Habitation Sites
 Temporary Field Camps
 Stone Artifact Scatters/Quarry Locations
 Food Procurement/Processing Sites
 Rock Art Panels (Prehistoric & Historic)
 Historic Ranches/Farmsteads
 Military Construction (1942-Present)
 Stage Station/Mail Route Remnants
 Small Mining Operations

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Why is it Important to Protect Cultural Resources?

- They provide information regarding **our** heritage, **our** practices, and **our** beliefs.
 - Contributes to **our** sense of place and identity
- These areas may have profound religious and spiritual significance to Native American tribes and other ethnic groups.
- Sacred Native American sites are rooted in the history of their people and maintain the continuity of traditional beliefs and practices.
- By preserving, protecting, and respecting cultural resources, you ensure these resources are available for future generations
 - Non-renewable resource – **once destroyed, can never be restored**
- It is **our** duty, as the land manager to be good stewards, ensuring compliance with all environmental and cultural laws and regulations.

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Another Reason for Protecting Cultural Resources...

BECAUSE IT'S THE LAW!

National Historic Preservation Act (NHPA)

Archaeological Resources Protection Act (ARPA)

Native American Graves Protection and Repatriation Act (NAGPRA)

American Antiquities Act of 1906

American Indian Religious Freedom Act

Army Regulation 200-1

And more...

And some of these laws, such as the Archaeological Resources Protection Act, carry criminal and civil penalties.

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9

Section 106 of the National Historic Preservation Act (NHPA)

- Section 106 of the NHPA requires us to consider the effects of our actions on historic properties.
 - Historic properties are any cultural resource that is listed in or is eligible for inclusion in the National Register of Historic Places (NRHP)
 - NRHP – list of cultural resources determined to be significant to the national, state, regional, or local history
- How **You** Can Comply with Section 106:
- Follow the Standard Operating Procedures (SOPs) in the Integrated Cultural Resources Management Plan (ICRMP)
 - SOP No. 1: Section 106 Compliance for Project Proponents
 - SOP No. 2: Mission Training of Military and Tenant Personnel
 - SOP No. 3: Emergency Operations

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What Happens When We Do Not Comply with NHPA Section 106?

- Colorado State Historic Preservation Officer contacts the Advisory Council on Historic Preservation (ACHP)
- ACHP contacts the Secretary of the Army
- Garrison Commander must answer to the Secretary of the Army on why we foreclosed on the consultation process
- Then, it falls to **YOU** to answer why
- Lawsuits can be filed by Tribes, other interested parties, and the public
 - Comanche Nation v. United States
 - Pueblo of Sandia v. United States
 - National Trust for Historic Preservation v. Department of State
 - City of Grapevine v. Department of Transportation
 - Paulina Lake Historic Cabin Owners Association v. U.S. Forest Service

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11

Scenario 1: Comanche Nation vs. United States

- Fort Sill proposed to constructed a 43,000 sq ft Training Support Center (TSC) warehouse (\$7.3 million) 1,662 ft southwest of the southern boundary of the Medicine Bluffs National Historic Feature
- Medicine Bluffs is a sacred site/TCP that is listed in the NRHP
- Fort Sill sent the draft final Environmental Assessment in Sep 2006
- Section 106 consultation letters mailed in Aug 2007
 - Comanche Nation requested more information and voiced concerns in correspondence dated Aug 2007, Oct 2007, Feb 2008, May 2008, & July 2008
- Construction of TSC began Aug 2008
- Comanche Nation filed a lawsuit in 15 Aug 2008
- Construction of TSC at new location in Oct 2009

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Scenario 1: Comanche Nation vs. United States

Comanche Nation asserted Fort Sill:

- Violated the Religious Freedom Restoration Act – building the TSC warehouse at the proposed location would interfere with the exercise of the Tribe's religious beliefs
- Violated the NHPA – Fort Sill failed to make a "reasonable and good faith effort" to consult to identify and resolve adverse effects

Outcome

- Project stopped and moved to another location
- \$650,000 lost on project costs and unknown \$\$\$ spent on legal costs
- Case is a precedent

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Archaeological Resources Protection Act

- Knowingly damaging an archaeological resource is a violation of the Archaeological Resources Protection Act (ARPA)
 - Includes looting, digging within a site, graffiti or other defacement, removing cultural features, etc.
- ARPA carries up to **\$100,000 fine** and **1 year in jail** for 1st offense



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Scenario 2: Graffiti

- Sep 2013 – archaeologists observed graffiti at a sacred site/TCP at the PCMS
- Led to an Article 15-6 investigation
- Now used as an example of what not to do
- **Graffiti is not tolerated anywhere, any time**
- Defacing federal property is against the law
 - Destruction of Government Property (18 U.S.C §§ 1361-1363) – up to \$250,000 fine, 10 years imprisonment, or both
 - ARPA
- Anyone caught defacing government property (buildings, rock faces, etc) will be prosecuted



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How Can You Help Protect and Preserve Cultural Resources?

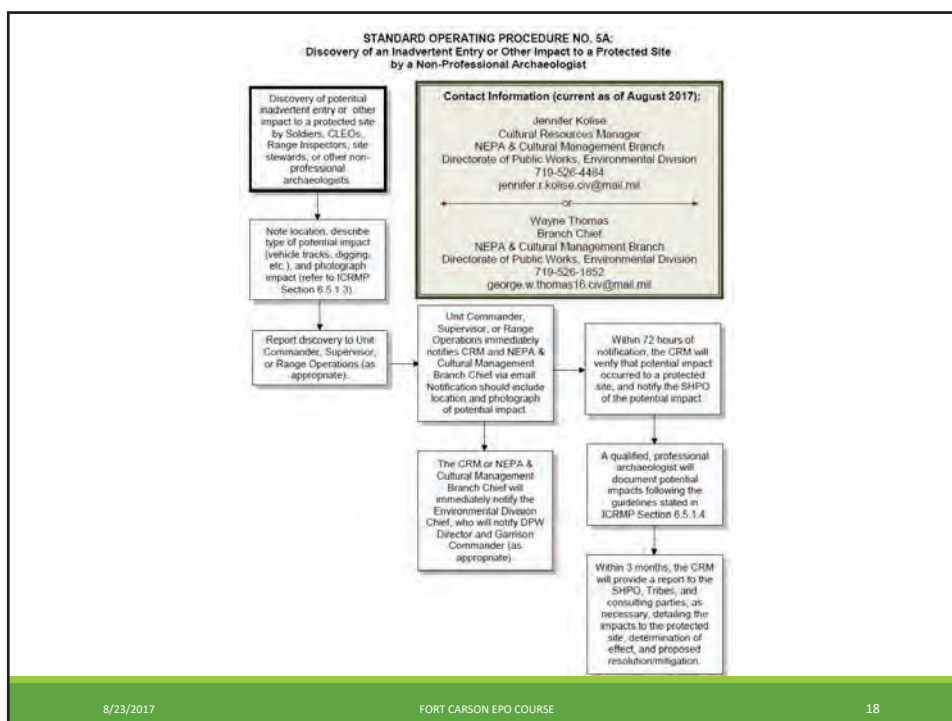
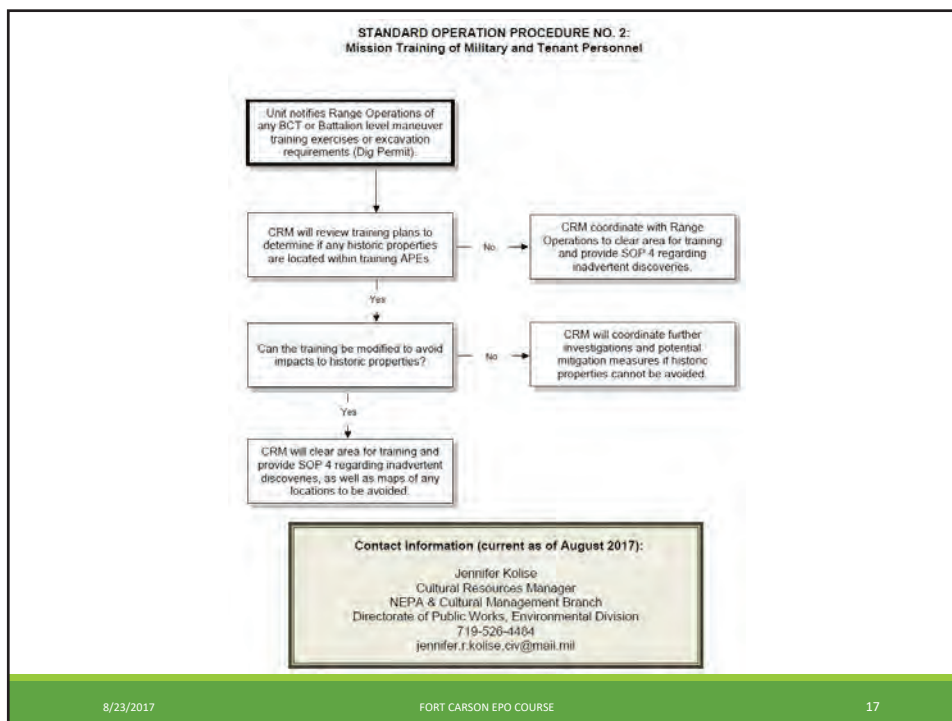
DO:

- Coordinate land use with Range Operations to ensure you are in an approved area.
 - **Especially excavation training (dig permit)**
 - Refer to ICRMP SOP No. 2
- Obey maneuver damage, environmental, and cultural resources protection policies and procedures.
- Observe posted signs, fencing, and Seibert marking indicating restricted areas that may be off-limits to vehicles, digging, bivouacking or other activities.
- Report any signs of looting, vandalism, or other damage to a cultural site to Range Operations and/or the Cultural Resources Manager (CRM).
 - Refer to ICRMP SOP No. 5A
- Stay vigilant!

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How Can You Help Protect and Preserve Cultural Resources?

DON'T:

- Collect any artifacts, including arrowheads and bottles.
- Disturb stone circles, rock mounds, ruins, or other cultural features, including using stones from cultural features to create defensive positions or resting areas.
- Lean against, sit on, or step on rock mounds, rock walls, ruins, or other cultural features.
- Touch or deface rock art or historical structures.
- Trespass in historical structures.

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If you find artifacts, bones, or other possible cultural items...

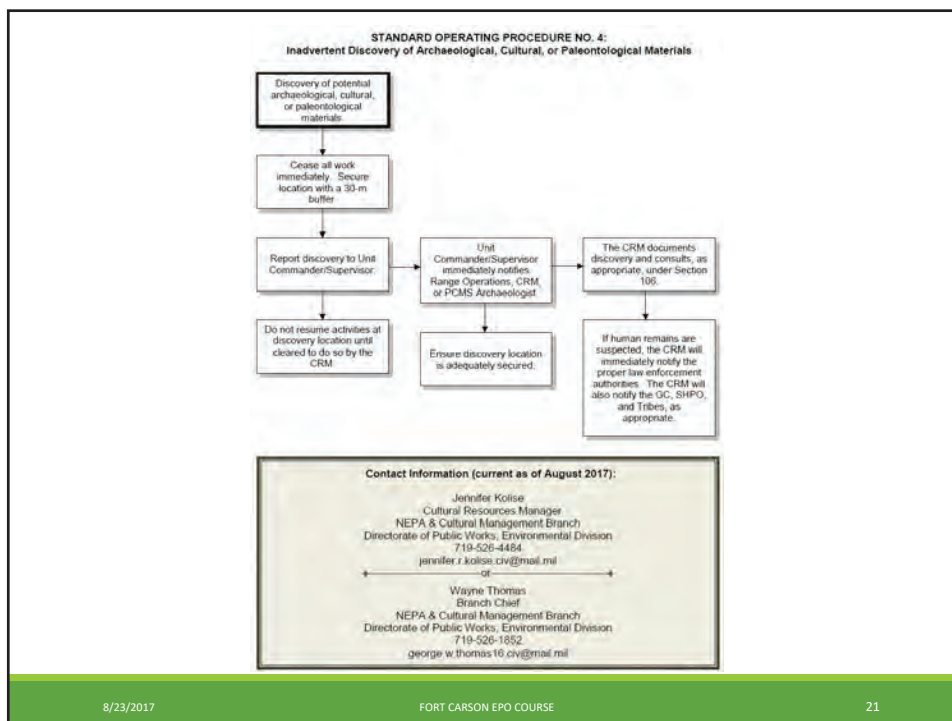
STOP WORK IMMEDIATELY

- Flag a protective buffer around the location of the discovery.
- Report the discovery to:
 - Fort Carson Range Operations (719-526-5698) or PCMS Range Operations (719-503-6120); and/or
 - Fort Carson CRM (719-526-4484) or PCMS Archaeologist (719-503-6136)
- You will be notified when you can proceed.

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What is the Harm in Taking a Souvenir?

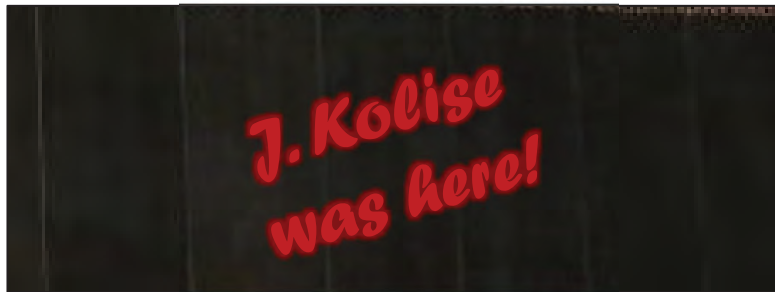
CHARLES V McMANUS • CARL L PALMER • DONNELL F REED Jr • DONALD B RODDY • JAMES D SMITH • PAUL BERT L STOKES • ROBERT E TAFT • RICHARD TESTA • ROBERT WARD Jr • REGINALD A WATKINS • ALEXANDER V EDICTO P BAYRON • CALVIN BOUKNIGHT • RICHARD L C DE LACY • JOHN C ELZY III • LUTHER V GILREATH • K • TOMMIE KEETON • BILLY M KNIGHT • REAVIS A M • BILLY J TALLEY • OSVALDO AMODIAS • CHARLIE ANDI • ER Jr • DONALD A BARNES • JIMMIE W BARTON • ROY SNYDER P BEMBRY • CLARENCE V BEVERHOUDT • D • MMY F BOREN • ROY H BOWLING • THOMAS G BRA • ARRY T BURNITE • WILLIAM R BURTON Jr • EMMETT L • ALVIN F COOKS • FRANCISCO J

If every person who visited the Vietnam Memorial decided to take one name off as a souvenir, eventually there would be nothing left.

CHARLES V McMANUS • CARL L PALMER • DONNELL F REED Jr • DONALD B RODDY • JAMES D SMITH • PAUL BERT L STOKES • ROBERT E TAFT • RICHARD TESTA • ROBERT WARD Jr • REGINALD A WATKINS • ALEXANDER V EDICTO P BAYRON • CALVIN BOUKNIGHT • RICHARD L C DE LACY • JOHN C ELZY III • LUTHER V GILREATH • K • TOMMIE KEETON • BILLY M KNIGHT • REAVIS A M • BILLY J TALLEY • OSVALDO AMODIAS • CHARLIE ANDI • ER Jr • DONALD A BARNES • JIMMIE W BARTON • ROY SNYDER P BEMBRY • CLARENCE V BEVERHOUDT • D • MMY F BOREN • ROY H BOWLING • THOMAS G BRA • ARRY T BURNITE • WILLIAM R BURTON Jr • EMMETT L • ALVIN F COOKS • FRANCISCO J

The same is true with archaeological sites. If everyone who visited a site took an arrowhead or bottle, eventually there would be nothing left that would give us information about the people who lived there. **OUR HERITAGE WOULD BE LOST!**

What's Wrong with this Picture?



Seriously...where's the harm in leaving your legacy somewhere?

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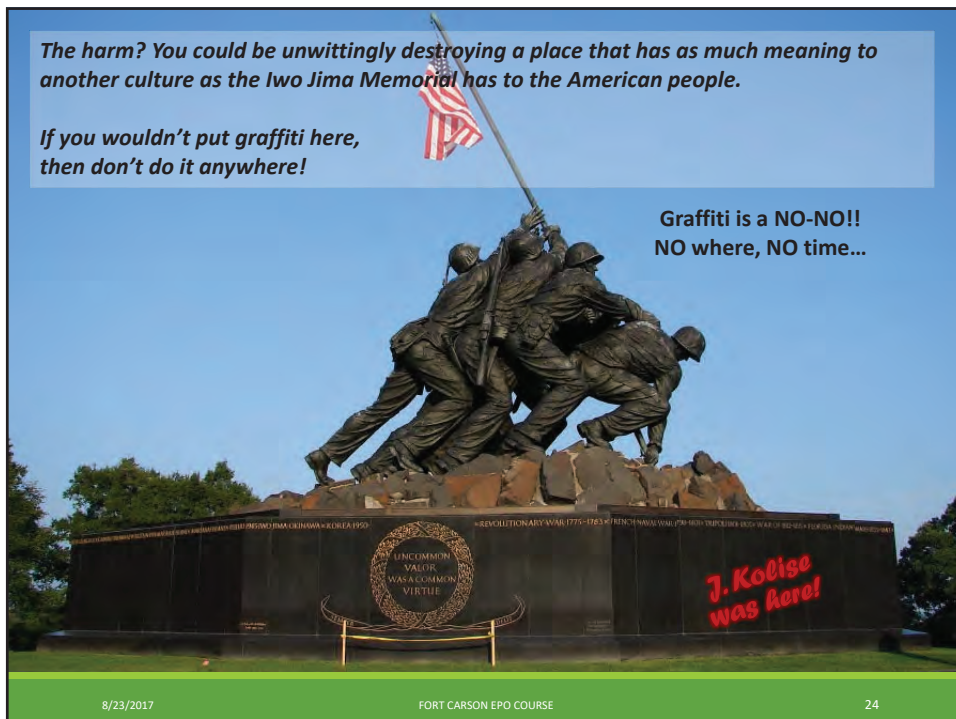
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The harm? You could be unwittingly destroying a place that has as much meaning to another culture as the Iwo Jima Memorial has to the American people.

If you wouldn't put graffiti here, then don't do it anywhere!

Graffiti is a NO-NO!!
NO where, NO time...

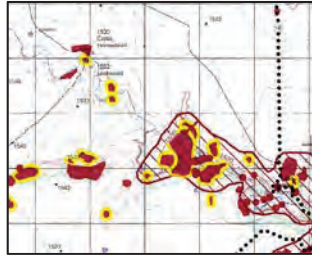


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Site Protection Measures



Protected Resources JCR Map

Red = unmarked restricted area
 Red with yellow outline = marked restricted area
 Red hash-marked area = dismantled training only
 White line through restricted area = authorized travel corridor

No digging or mounted maneuvers within protected areas

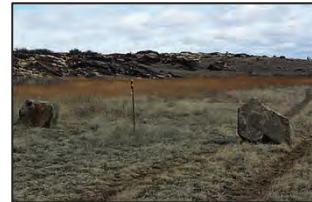


Seibert Marker

Red, yellow, and white 3M reflective tape
 Black stripe points to inside of restricted area.



Protection Fences with Restricted Access Signs



Seibert Markers and Boulders

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Where Can You Learn More?

Integrated Cultural Resources Management Plan (ICRMP)

- Fort Carson-specific tool for the management of cultural resources
 - Outlines program obligations, goals, priorities, and SOPs
- Chapter 7 contains the SOPs relevant to your job
 - SOP No. 1: Section 106 Compliance for Project Proponents
 - SOP No. 2: Mission Training of Military and Tenant Personnel
 - SOP No. 3: Emergency Operations
 - SOP No. 4: Inadvertent Discovery of Archaeological, Cultural, or Paleontological Materials
 - SOP No. 5A: Discovery of an Inadvertent Entry or Other Impact to a Protected Site by a Non-Professional Archaeologist
- Where can it be found?
 - <https://www.carson.army.mil/organizations/dpw.html#three>

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Main Points to Remember

- Cultural resources are non-renewable.
- Obey cultural resources laws and regulations
- Follow Fort Carson-specific guidance and SOPs outlined in the ICRMP
- No digging or mounted maneuvers within protected areas
- Use established travel corridors through protected areas
- Leave cultural resources as you found them
- Report any suspected looting, vandalism, site entries, etc., immediately to Range Operations and/or the CRM
- We are here to help you: 526-4484 (CRM) or 503-6136 (PCMS Archaeologist)

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The Army is legally required to protect and manage cultural resources.

A. True

B. False

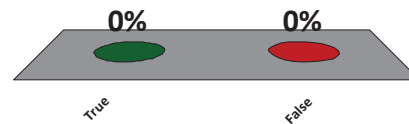
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28

The Army is legally required to protect and manage cultural resources.

- A. True
- B. False



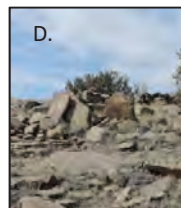
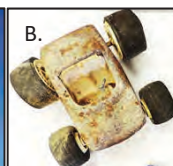
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29

Which of the following would be considered a cultural resource?

- A. Trail
- B. Toy
- C. Building
- D. Rock formation
- E. B & C only
- F. C & D only
- G. All of the above
- H. None of the above



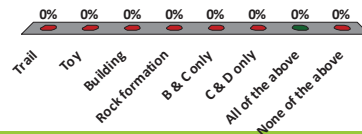
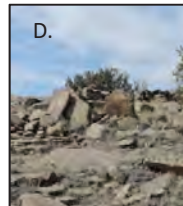
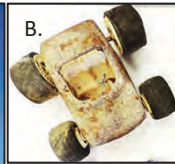
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30

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- D. Rock formation
- E. B & C only
- F. C & D only
- G. All of the above
- H. None of the above



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31

While digging a tank ditch, you find an arrowhead and other stone chips. What should you do first?

- A. Call Range Control or the CRM immediately.
- B. Cover it back up and say nothing.
- C. Put the arrowhead in your pocket. It would be a nice addition to your collection.
- D. Stop all work immediately, and place a buffer around the area.

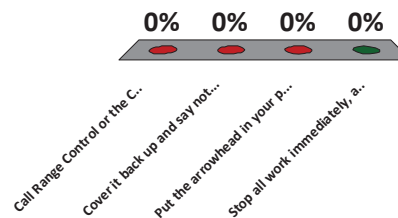
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32

While digging a tank ditch, you find an arrowhead and other stone chips. What should you do first?

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33

You cannot be prosecuted for unknowingly defacing an archaeological site on an Army installation.

- A. True
- B. False

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34

You cannot be prosecuted for unknowingly defacing an archaeological site on an Army installation.

- A. True
- B. False



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CULTURAL RESOURCES

POTENTIAL HAZARDS AND ENVIRONMENTAL CONCERNS

Cultural resources are remnants of past human activities that have cultural or historical value and meaning to a group of people. A resource can be thousands of years old, hundreds of years old, or from the more recent past. Examples include: rock art and carvings; archaeological sites; historic buildings, structures or objects; historic roads and trails; Native American sacred sites and traditional cultural properties; human burials; artifacts; and ruins. As a land manager, it is our duty to be good stewards, ensuring compliance with all environmental and cultural requirements, laws, and regulations. Violation of cultural resources protection laws can result in civil and criminal penalties, monetary fines, and imprisonment.

HANDLING PROCEDURES

☆	Coordinate land use with Range Control Operations to ensure you are in an approved area.	 <p>Pictured above are various cultural resources that have been recorded on Fort Carson and PCMS.</p>
☆	Observe posted signs, fencing, and Seibert marking that indicate restricted areas which may be off-limits to vehicles, digging, bivouacking, or other high impact activities.	
☆	Do not collect artifacts, including arrowheads and bottles. Do not disturb stone circles, rock mounds, ruins, or other cultural features. Do not touch or deface rock art, or scratch on rocks or objects of any kind.	
☆	Do not trespass in historic structures even when not marked.	  <p>Graffiti, as seen in the photograph above, can irreparably harm the integrity of a site. There is no way to remove the graffiti without doing further damage to the site. The yellow, red, and white Seibert markers indicate areas where vehicles, digging, or bivouacking are not allowed.</p>
☆	Report any signs of looting, graffiti, or other damage to a cultural site to Range Control Operations or Cultural Resources staff.	
☆	No graffiti anywhere, anytime.	
☆	If buried artifacts, bones, or other cultural items are found, stop work immediately, flag a protective buffer around the location of the discovery, and report the discovery to Range Control Operations or Cultural Resources staff.	

GENERAL INFORMATION

For additional information concerning cultural resources, contact the Fort Carson Cultural Resources Manager at 526-4484 or the PCMS Archaeologist at 503-6136.

Range Control Operations: Fort Carson 526-5698 / PCMS 526-6123 or 6130

Reference: [Fort Carson Regulation 200-1](#).

Soldiers who have been designated to the Observer-Controller Team for a brigade exercise must go through special training. This brief covers environmental considerations, including cultural resources, and is usually provided by the Fort Carson Cultural Resources Manager. It is adapted for each specific brigade exercise.

1/11/2021

IRON STRIKE OC TEAM BRIEF

ENVIRONMENTAL CONSIDERATIONS

Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



TOPICS

- Protected Resources
- Wildlife Guidance
- Cultural Resources Guidance
- Spill Response
- Iron Strike Dig Request Process

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



WHAT IS A PROTECTED RESOURCE?

- Not just protected archaeological sites (or cultural resources), but also...
- Protected natural resource area
- Critical infrastructure
- Human health and safety concern

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CULTURAL RESOURCE EXAMPLES



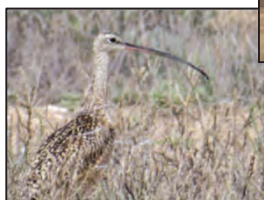
- Rock art, i.e. petroglyphs (carvings) and pictographs (paintings)
- Archaeological sites
- Historical buildings, structures, and objects
- Historical roads and trails
- Sacred sites and traditional cultural properties
- Human burials
- Artifacts
- Ruins

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NATURAL RESOURCE EXAMPLES

- Migratory bird nesting sites
- Golden eagle nesting sites
- Critical habitat for threatened / endangered species



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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



CRITICAL INFRASTRUCTURE EXAMPLES

- Windmills and associated wells & tanks
- Solar panels
- Pipelines
- Utility lines
- Erosion control dams



Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



HUMAN HEALTH & SAFETY CONCERN EXAMPLES

- Contaminated areas
- Open pits / wells / mine shafts
- Steep drop offs



Jen Kolise, Cultural Resources Manager – 719-526-4484 – jennifer.r.kolise.civ@mail.mil
 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



COMPLIANCE REQUIREMENTS FOR PROTECTED RESOURCES

- No vehicles allowed
- No excavation allowed
- No bivouacking allowed
- No aerial maneuvering allowed within 100 meters
- Travel allowed only on approved travel corridors through the area as shown on the map

Best Practice: While operating a vehicle, implement a 30-meter stand-off distance from the perimeter of the protected resource as depicted on the map.

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – craig.e.dengel.civ@mail.mil



PROTECTED RESOURCES MAP SYMBOLS: UNMARKED PROTECTED RESOURCE



Symbol: Area polygon with red-filled interior

Definition: Protected resource that lacks marking or is partially marked (Seibert markers, protection fencing with signs, or combination of both)

Caveats: Ensure the entire red perimeter is avoided at all times by vehicles. **Do not simply rely on the observed Seibert markers and/or fencing.**

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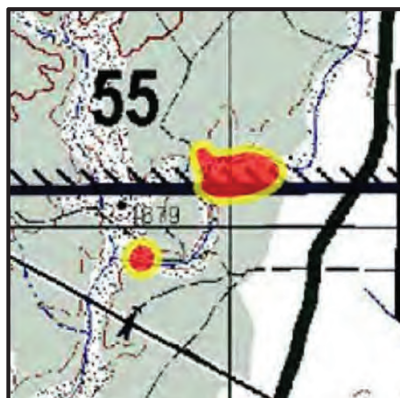


PROTECTED RESOURCES MAP SYMBOLS: MARKED PROTECTED RESOURCE

Symbol: Area polygon with red-filled interior and yellow outline (halo)

Definition: Protected resource that is completely marked with Seibert markers, protection fencing with signs, or a combination of both

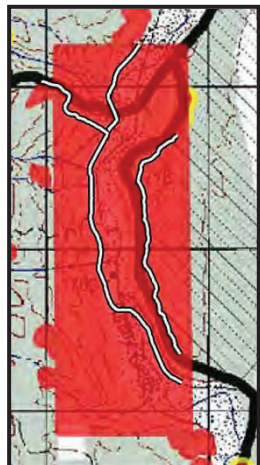
Caveats: Ensure the yellow outside perimeter is avoided at all times by vehicles. **Do not simply rely on the observed Seibert markers and/or fencing.**



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PROTECTED RESOURCES MAP SYMBOLS: AUTHORIZED TRAVEL CORRIDOR



Symbol: White line interior and black outline

Definition: Corridors approved for travel through protected resources

Caveat: No off-road travel allowed within the protected resource. **Stay on the approved, existing corridor only.**

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PHYSICAL PROTECTION MEASURES



Seibert Marker

Red, yellow, and white 3M reflective tape
Black stripe points to inside of restricted area.



Protection Fences with Restricted Access Signs



Boulders

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INADVERTENT ENTRY / IMPACT

- Inform Range Operations **immediately** of any inadvertent entries into or other impacts to a protected resource.
- Note conditions and how / why the entry or impact occurred.
 - This information helps prevent future entries or impacts.

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NATURAL RESOURCES GUIDANCE

Refer to Fort Carson Environmental Battle Book, v 5.1, DEC 2016

- Page 77, "Wildlife (Dangerous): Bears / Mountain Lions / Rattlesnakes / Coyotes"
- Page 78, "Wildlife (Migratory Birds): Songbirds / Raptors / Ravens / Etc."
- Page 79, "Wildlife (Problem Critters): Raccoons / Skunks / Rodents / Non-Venomous Snakes / Etc."
- Page 80, "Wildlife (Sensitive or T&E Species): Prairie Dogs / Burrowing Owls"

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NATURAL RESOURCES GUIDANCE

- Military training activities are **not** exempt from the Migratory Bird Treaty Act, but are authorized for incidental take under the 50 CFR Part 21.
- Nesting birds should be avoided when possible.
- Avoid digging or bivouacking in prairie dog colonies due to potential plague exposure.
- Contact the Wildlife Biologists or Conservation Law Enforcement Officers for any wildlife issues (e.g. snake removal, injured animal, incidental take).

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NATURAL RESOURCES GUIDANCE

- Do not crush or cut trees unnecessarily.



This tree was approximately 200 years old.
 This was avoidable.



Stock tanks provide drinking water for wildlife.

- Do not run over stock tanks or guzzlers.

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CULTURAL RESOURCES GUIDANCE

Refer to Fort Carson Environmental Battle Book, v 5.1, DEC 2016, page 31, "Cultural Resources" and Chapter 7 of the Integrated Cultural Resources Management Plan.

- Observe posted signs, fencing, and Seibert marking. No digging, bivouacking, mounted maneuvers, etc. within these areas.
- Do not collect artifacts.
- Do not disturb stone circles, rock mounds, ruins, or other cultural features.
- Do not touch or deface rock art.
- Do not trespass in historic structures (safety hazard).

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CULTURAL RESOURCES GUIDANCE

- Report any signs of looting, graffiti, or other damage to Range Operations or Cultural Resources staff.
- No graffiti anywhere, anytime.



You will not WRITE, PRINT, PAINT, STAMP, SCRATCH, PECK, OR CHALK ON ANY STONE SURFACES, BUILDINGS / STRUCTURES (HISTORIC OR MODERN), OR LATRINE WALLS!!!!

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IF YOU FIND ARTIFACTS, BONES, OR OTHER POSSIBLE CULTURAL ITEMS...

- Stop work immediately.
- Flag a protective buffer around the location of the discovery.
- Report the discovery to Range Operations.
- You will be notified when you can proceed.

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SPILL RESPONSE

Refer to Fort Carson Environmental Battle Book, v 5.1, DEC 2016, page 67, "Spill Clean Up and Reporting Oil/Hazardous Substance."

- Spill cleanup is the unit's responsibility.
- General response procedures:
 - Do not put personnel at risk.
 - Contain and report to your unit. Report location to Range Operations.
 - Spills of 5 gallons or more must be reported to Range Operations immediately.
 - Range Operations will contact the Fire Dept. Do not call 911 at PCMS.
 - Most spills are cleaned up by removing the contaminated soils.
 - Recovered contaminated soils will be transported to the PCMS Cantonment for disposal.

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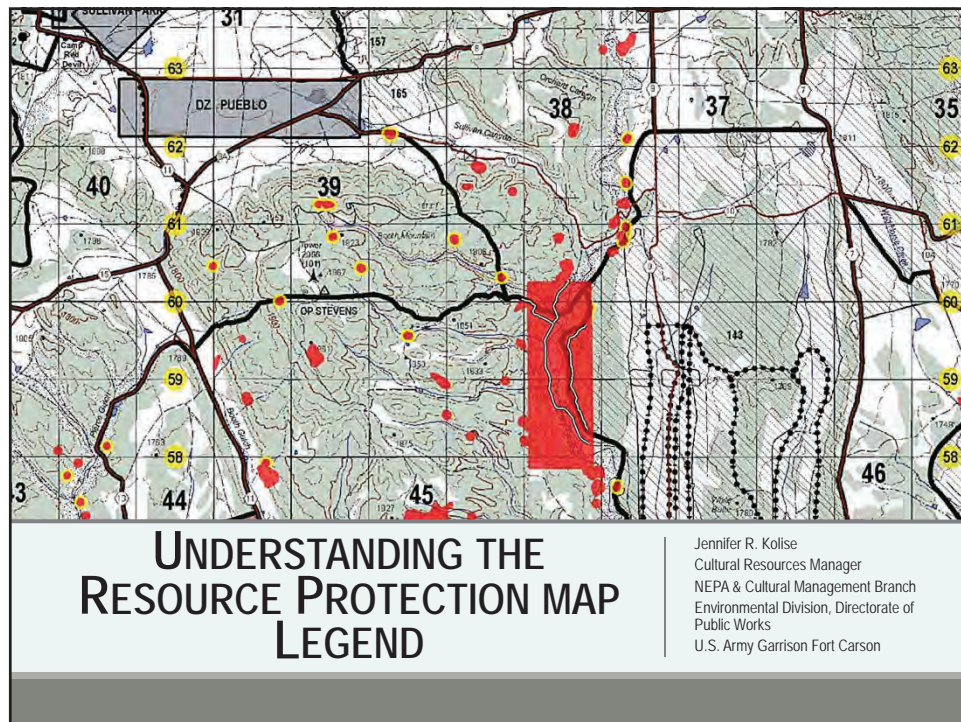


IRON STRIKE DIG REQUEST PROCESS

- Unit submits dig request through chain of command to HICON (type of excavation, method, and MGRS coordinates).
- HICON reviews request (approves or denies).
- If approved, unit digs and provides dig locations through chain of command back to HICON.
- Accurate reporting of dig locations facilitates Cultural Resource staff inspection and future land remediation.

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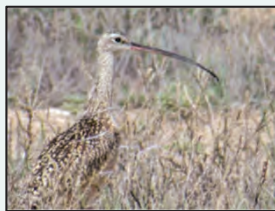


WHAT IS A PROTECTED RESOURCE?

- Protected natural resource area, such as critical habitat for a threatened & endangered species or a migratory bird nesting site
- Protected cultural resource area, such as archaeological sites, historic buildings, or burials
- Critical infrastructure
- Human health & safety concerns, such as radiation control areas, mine shafts, or steep cliffs

NATURAL RESOURCE EXAMPLES

- Critical habitat for threatened & endangered species
- Golden eagle nesting sites
- Migratory bird nesting sites



CULTURAL RESOURCE EXAMPLES



- Rock art, i.e. petroglyphs (carvings) and pictographs (paintings)
- Archaeological sites
- Historical buildings, structures, and objects
- Historical roads and trails
- Sacred sites and traditional cultural properties
- Human burials
- Artifacts
- Ruins

CRITICAL INFRASTRUCTURE EXAMPLES

- Windmills and associated wells & tanks
- Solar panels
- Pipelines
- Utility lines



HUMAN HEALTH & SAFETY CONCERN EXAMPLES

- Environmental contamination areas, e.g. radiation control areas & asbestos contaminated areas
- Open pits, wells, & mine shafts
- Steep drop offs

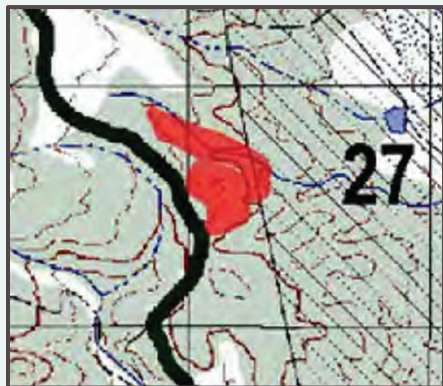


COMPLIANCE REQUIREMENTS

- No vehicles allowed
- No excavation allowed
- No bivouacking allowed
- No aerial maneuvering allowed within 100 meters
- Travel allowed only on approved travel corridors through the area as shown on the map

Best Practice: While operating a vehicle, implement a 30-meter stand-off distance from the perimeter of the protected resource as depicted on the map.

STANDARDIZED SYMBOL: UNMARKED RESOURCE



Symbol: Area polygon with red-filled interior

Definition: Protected resource that lacks marking or is partially marked (Seibert markers, protection fencing with signs, or combination of both)

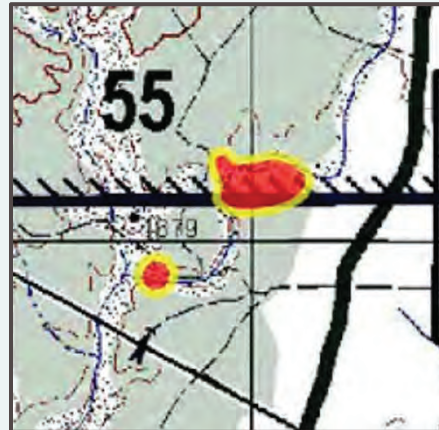
Caveat: Ensure the entire red perimeter is avoided at all times by vehicles. **Do not simply rely on the observed Seibert markers and/or fencing.**

STANDARDIZED SYMBOL: MARKED RESOURCE

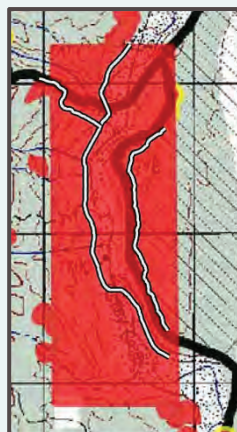
Symbol: Area polygon with red-filled interior and yellow outline (halo)

Definition: Protected resource that is properly marked with Seibert markers, protection fencing with signs, or a combination of both

Caveat: Ensure the yellow outside perimeter is avoided at all times by vehicles. **Do not simply rely on the observed Seibert markers and/or fencing.**



STANDARDIZED SYMBOL: AUTHORIZED TRAVEL CORRIDOR THROUGH PROTECTED RESOURCE



Symbol: White line interior and black outline

Definition: Corridors approved for travel through protected resources

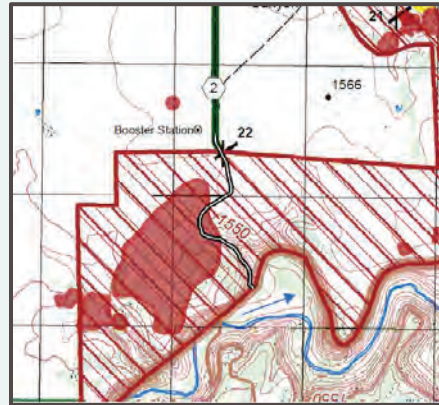
Caveat: No off-road travel allowed within protected resource. **Stay on the approved existing corridor only.**

STANDARDIZED SYMBOL: DISMOUNTED ONLY AREAS

Symbol: Area polygon with red crosshatch

Definition: Dismounted only training area all vehicles must stay on approved roads no off-road vehicle travel is authorized

Caveat: These areas do not conform to topography.



PHYSICAL PROTECTION MEASURES



Seibert Marker

Red, yellow, and white 3M reflective tape black stripe points to inside of restricted area.



Protection Fences with Restricted Access Signs



Boulders

ENCLOSURE 4:
NOT 1 MORE ACRE! CORRESPONDENCE ON FY20 ANNUAL REPORT

December 14, 2020

**VIA EMAIL: (jennifer.r.kolise.civ@mail.mil; carlos.rivero-deaguilar.civ@mail.mil;
george.w.thomas16civ@mail.mil)**

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

**Re: Comments on PCMS FY2020 Annual Cultural Resources Report
and Reply to Army Letter Dismissing N1MA! Comments on FY2019 Report**

Dear Ms. Kolise and Mr. Rivero-deAguilar:

On behalf of Not 1 More Acre! (N1MA!), these comments are submitted on Army's FY2020 Annual Report, required by the 2014 Programmatic Agreement (2014 PA) pertaining to cultural resources at Piñon Canyon Maneuver Site (PCMS), Colorado. They are also submitted in reply to Mr. Rivero-deAguilar's letter of Nov. 10, 2020, dismissing N1MA!'s comments on the 2019 cultural resources Annual Report.

Introduction

The cultural resources Annual Report for Fiscal Year 2020 marks yet another year with a lack of progress toward protection of historic and cultural properties on PCMS, which is home to unique concentrations of thousands of archaeological, prehistoric and historic sites, many eligible for listing on the National Register of Historic Places.

Army remains in violation of the 2014 PA for the protection of cultural resources at PCMS and the National Historic Preservation Act (NHPA) 54 U.S.C. §300101 *et seq.* Violations, now many decades old, remain unresolved. There was not even any correspondence aimed at resolving these violations during the entire year. p.6.

Six years ago, Army promised the public in official documents that the effects of Army's repetitive training operations using multi-ton tanks, military vehicles, aviation assets and other lethal weapons systems on fragile shortgrass prairie at 236,000-acre PCMS would cause only "negligible to minor" effects on cultural resources. Three years ago, Army stated that the effect of adopting an Integrated Cultural Resources Management Plan (ICRMP), based on the 2014 PA, would be "beneficial" to cultural resources at PCMS.

What followed, instead, were dozens and dozens of violations of the 2014 PA and the NHPA, with heavy military equipment intruding into, through and over protected historic properties, over and over and over again. The violations have continued to stack up faster than they are being resolved.

As documented now, in a string of after action reports and annual reports, Army's promises of "negligible to minor" and even "beneficial" effects to cultural resources were just plain lies and cruel deceptions – the stuff of political corruption that betrays public trust.

Now, under the false guise of “mitigation” and the bet that false promises it made years ago are fading in memory, Army stands on the precipice of dropping the other shoe: Seeking permission to quit protecting some cultural properties – “in situ” as Army quaintly puts it – because preserving records of human presence dating back more than 10,000 years at PCMS and surrounding region is just not compatible with military use, regardless of the law.

Army was warned of these and related concerns before it selected the PCMS site and began the condemnation process that forced generational ranching practices – essential to the health of grazing-dependent shortgrass prairie – off the land.

If anything, as the years have passed, Army’s attempts to comply with the historic preservation laws and, more recently, its binding contractual agreements in the 2014 PA – disreputable from the beginning – have since declined and settled into sullen intransigence against even the most modest improvements.

In the annual report and accompanying letters, the Colorado State Historic Preservation Office (SHPO) suggestions for incremental improvements are brushed aside again and again with so-called “respectful” disagreements. Bluntly put, Army wants to hold SHPO and other parties to their contractual commitments in the 2014 PA, while disavowing its own reciprocal obligations under the same contract.

How is this compliance with the NHPA?

All the while, Army operations and related developments continue to increase in intensity and tempo, expanding the breadth and depth of military destruction at PCMS – done under cover of Army’s illegal secrecy enabled by political corruption – that are, in fits and starts and cumulatively, pulverizing the life out of the historic, environmental and economic setting of the largest remaining expanse of native shortgrass prairie in the American Great Plains.

The parties who could institute revoking or terminating the 2014 PA remain mum, while N1MA! has been calling for such action for several years.

At this late date, after a long string of cultural resource failures documented by Army’s own records, one thing should be readily apparent: Entering and implementing agreements with Army based on its assurances and promises is a fool’s errand.

In Army’s world, destroying protected historic sites so their artifacts can be exhibited in a museum somewhere – maybe even a museum on a military base because part of Army’s fraud is that it is something other than a war agency – is somehow actually “saving” them.

The “sacrifice” of some properties eligible for listing on the National Register of Historic Places “in situ” won’t “save” others, but will just have the effect of leading to even more losses.

Army should be held to deliver on its promises and obligations under the historic preservation and environmental laws through whatever means are necessary.

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

The Annual Report indicates 567 “needs data” sites remain unevaluated, despite the 2017 deadline for gathering data in the 2014 PA at §I.B. Army attempts to excuse this failure – indeed calls the task of surveying “completed” – because it has adopted “protections” for these sites instead. Encl. 2, p.18.

However, past after action reports by Army have shown that these “protections” have not worked to prevent intrusions by tanks, military vehicles, aviation assets and other weapons systems on protected sites, and SHPO flatly considers them “inadequate” to fulfill the stipulations. 11/29/18 letter, Att. 3, p.1; 1/15/20 letter, Att. 3, p.1.

The Annual Report cites no efforts being made to improve these measures and ensure they actually work.

As SHPO has pointed out, the stipulations in the 2014 PA require “continued action and/or maintenance.” 11/29/18 letter, p.1.

However, Army’s responsive letters continue to show a stubborn opposition to suggestions by SHPO to plug these loopholes.

In most cases, the “needs data” sites on PCMS are not protected by on-the-ground markings or obstructions, but rather by notations on paper or in some computer, buried in a mass of Army rules, regulations and policies that are not meaningful in any practical sense. It should hardly be a surprise that such “protections” don’t work well, if at all.

The Annual Report indicates Army spent the year drafting research designs for 71 sites and evaluating 58 isolated finds. Encl. 2, §1. B.

At this snail’s pace, many “needs data” sites are likely to be damaged or destroyed before they are even evaluated. Army’s record of evading the cultural and environmental loss of its destruction begets more destruction of irreplaceable concentrations of prehistoric, archaeological and historic sites in the American West.

Stipulation III.D: Global Positioning System Protection

Stipulation III.D of the 2014 PA requires that Army provide training aircraft and vehicles with global positioning system information concerning protected properties within one year of the 2014 PA, or by 2015, and to “implement” these protections by 2015. Years later, however, this task is not implemented.

The Annual Report, however, falsely claims that this task has been “completed.” Encl. 2, p.17.

On numerous occasions, Army has reported that the appropriate GPS data was not uploaded to the systems used by training vehicles or was intentionally turned off for simulated “opposing forces.” Army’s claim that this task has been “completed” is just false, and no efforts at correcting these failures are reported.

SHPO has repeatedly rejected the claim that this task is completed, due to such factors as equipment failure, user ability to toggle on/off, the loading of improper maps and the fact that some vehicles are not properly equipped. 11/29/18 letter, Att. 2, p.1; 1/15/20 letter, Att. 2, p.1.

In its recent letter to SHPO, Army admits that, “Not all tactical vehicles have GPS equipment nor is it always operational,” but this should suffice as “acceptable progress” toward 2014 PA compliance anyway. 12/30/19 letter to SHPO, Encl. 3, p.3; 10/30/20 letter, Encl. 3, p.2.

Why do not all vehicles have GPS? What concrete steps are being taken to remedy this omission? When will the problems be remedied?

Why is the GPS warning system not always operational? What concrete steps are being taken to remedy this omission? When will the problems be remedied?

Instead of addressing these concrete issues, Army makes the ludicrous claim that all it has to do under the 2014 PA is provide the troops with the GPS data to meet its “obligation,” but need not do anything to make sure personnel actually use it or that it actually works as intended to protect historic properties. 11/10/20 letter, Encl. 1, p.4.

Army continues to shirk its plain duty to “implement” this protection as outlined in the 2014 PA.

This is a good example of why the 2014 PA should be terminated. Army simply refuses to abide by its plain terms.

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 were totally omitted in Army’s 2017, 2018 and 2019 Annual Reports.

This year’s report contains the same omission.

It is blatant, intentional, repeated disregard of the plain terms of the 2014 PA such as this that warrants termination of the 2014 PA.

Army does admit that cumulative training and operations cause adverse effects to historic properties, but all Army says about mitigation is that consultation is “ongoing.” 11/10/20 letter, Encl. 1, p.5. Army says its back and forth letters with SHPO are consultation. 11/10/20 letter, Encl. 1, p.5.

This point was raised *three years ago* and remains unaddressed but for an exchange of letters that appears to merely involve “agreements to disagree.”

Under the plain terms of the 2014 PA, this topic is to be discussed annually, in *each* annual report.

When mitigation is actually developed, if one accepts Army’s promises that “progress” will eventually occur, it will be too late.

Stipulation II.B, III.C: Operating 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. There have been more than 150 such violations reported in connection with brigade scale operations since 2010 alone.

No such violations were reported in 2020 because of *allegedly* limited brigade operations this year, but they have and will inevitably occur. Army refuses all steps to adopt improvements.

Army continues to call these violations “inadvertent” and not a violation of the 2014 PA and NHPA, because it works to resolve them (even though the resolution process can last a decade or longer). 11/10/20 letter, Encl. 1, p.5.

Yet, how “inadvertent” could these violations be when they have occurred over and over again in 2010, 2013, 2015, 2017 and 2018 brigade level operations (and more that have gone undisclosed) and when Army refuses to discuss even modest improvements in measures aimed at preventing them in the future?

Despite Army’s denials, the 2014 PA, agreed to by Army, clearly states that entries of this type into protective properties are “not permitted,” §II.B, and thus each of the dozens and dozens of such entries is a plain violation of the agreement. 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), (b)(2)(iii) (“compliance” with programmatic agreement “satisfies the agency’s section 106 responsibilities for all individual undertakings” under NHPA; rule does not cover “noncompliance” such as repeated recurring violations coupled with unyielding resistance to modest improvements).

Army is committing knowing, ongoing and inevitable violations of the 2014 PA and the NHPA and is insisting it need not make any improvements to prevent them.

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” is not adequate for protection of historic properties and does not satisfy the 2014 PA alone. SHPO also noted that the use of limited “Seibert stakes” had been shown to be problematic due to the use of night-vision goggles during exercises, and an evaluation of this and other potential physical site markers should be undertaken. Att. 3, p.1. SHPO reiterated these comments in its 1/15/20 letter. Att. 3, p.1.

Army, however, dismisses these modest suggestions as infeasible due to budget limitations and other priorities. 12/30/19 letter, p.3. It says, incredibly, that “[p]hysical protections measures will never be foolproof” 10/30/20, Encl. 3, p.1.

No one disputes that the limited protection measures provided by Army are “not foolproof,” but only Army, and no thinking person, believes they are “working well as a deterrent.” 10/30/20, Encl. 3, p.1. The quantitative data from after action reports – which Army tries to deflect – demonstrate that.

Given Army’s record of ongoing and increasing violations of the 2014 PA, the PA should be terminated.

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 Area of Potential Effects (APE) on an annual basis.” On Nov. 29, 2018, and again on Jan.15, 2020, SHPO commented that “there is little to suggest” that the current training program “is decreasing the number of sites impacted by brigade training,” and proposed that annual training should be extended to “all command positions.” pp. 28-29. 11/29/18 letter pp. 1-2, Att. 3, p.2; 1/15/20 letter p.1, Att. 3, p.1.

Instead of just agreeing to this modest suggestion, Army, in response, launches into a long list of diversionary discussions disputing the point and saying cultural training really is working even though quantitative measures show the opposite. 12/30/19 letter pp. 2-3; 10/30/20 letter, pp. 2-3.

The plain terms of the 2014 PA, however, require annual training “for all personnel involved in the execution of undertakings” §V.A. Certainly, command officers would be included in the plain meaning of “all personnel.”

Given the long string of, and indeed increasing, cultural resources violations, it is reasonable to believe that while training of personnel may be occurring, commanders may not be serious about requiring compliance with the cultural resource requirements on the ground during military operations. This is a modest step that Army should have agreed to but, instead, refuses to implement.

In doing so, Army is violating the plain terms of the 2014 PA.

Continued and Increasing NEPA Violations

As before, the National Environmental Policy Act (NEPA) violations at PCMS continue to pile up to an astonishing degree. 42 U.S.C. §4331 *et seq.*

In its 12/30/19 response letter to SHPO, attached to the Annual Report, Army discloses to the public for the first time that it has been operating at PCMS at a “considerably higher operational tempo of maneuver training throughout the year (2020).” p. 2.

No environmental assessment (EA) or environmental impact statement (EIS) has been prepared to address this “considerable” increase.

The 2015 PCMS Training and Operations EIS, which was flawed to begin with, is five years old and out of date. *Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulation*, Q&A 32. 46 Fed. Reg. 18026 (March 23, 1981).

As noted last year, there have been numerous developments, including changes and increases in intensity and tempo of operations and munitions used at PCMS, since the 2014 EIS that Army has failed to address through either an EA or EIS.

For example, that old document did not include analysis of 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 at least 5,000 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 EA but ***specifically declined to consider training impacts to PCMS.***

That old EIS 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 19-ton Stryker vehicles and 4,500 personnel) announced May 2019, for which Army prepared an EA but ***specifically declined to consider any training impacts to PCMS.***

It did not include plans announced by Army earlier in 2019 to move approximately 32 miles of CIG's natural gas pipeline from one location on PCMS to another, which was estimated to open up an estimated 66,000 acres at PCMS to new military use impacts.

It did not include plans 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 approach of simply “writing off” protections for protected cultural properties, because of the 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).

As N1MA! has specifically pointed out for many years now, 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 nothing more than a list of backroom bureaucratic excuses to avoid public disclosure by not doing a NEPA review.

For example, the Annual Report, at Encl. 1, p.11, shows that Army prepares quarterly a REC to cover impacts from ongoing training operations, but keeps these impacts entirely secret and free from public disclosure and comment. By comparison, disclosure of cultural resources after action reports have shown significant damage.

Last year, N1MA! commented on the 2019 PCMS Area Development Plan, which has never been subject to any kind of public notice or official NEPA review. Army's 11/10/20 letter responding to N1MA! fails to mention it or to provide a public copy. p.9. The coverup continues.

The continuing use and, in fact, increased use of RECs for the purpose of avoiding transparency and honesty with the public can, at this point, show nothing other than that Army's violations of NEPA are knowingly and intentionally corrupt.

Continued Shell Game Diversionary Tactics: Send Comments to the People Over There Not Taking Public Comments.

In response to N1MA!'s demonstration of ongoing illegal efforts by Army to hide environmental impacts at PCMS, to avoid public participation on those impacts and to ignore properly

submitted Freedom of Information Act requests concerning those impacts, Army repeatedly responds that environmental comments, FOIA comments and air and water quality comments should be directed to other offices at Fort Carson, which manages PCMS, and not the cultural resources office. 11/10/20 letter, Encl. 1, pp.2, 7, 8.

Instead of addressing N1MA!'s concerns or providing responsive documents, Army engages in the time-honored "shell game" swindle – *Oh, it's somebody else's job, contact the persons over there who are not providing public notice or deadlines for public comments.*

Army implies that if only N1MA! had sent its comments to the proper office, responsive documents would have already been sent and a full-blown updated science-based EIS would have already been prepared. This is completely farcical.

Responsive letters rejecting everything N1MA! says is par for the course with Army, whether the environmental division or cultural resources division is involved. With a straight face, Army even affirmatively calls this "consultation" with N1MA!

Army's 11/10/20 letter to N1MA! is, in fact, addressed from Army's Environmental Division, but it does not announce preparation of a new NEPA document or documents or opening of new public comment periods. It merely states – after a year in which to respond – that N1MA! should have contacted its NEPA program instead of the cultural resources division. p.7.

Army's Environmental Division letter also, for example, asks N1MA! to contact the FOIA office, that it itself said in a February 2019 letter had "administratively closed," for the request without providing any documents.

Under FOIA, the fact that a request for information is misdirected does not relieve a federal agency of responding but, at most, tolls the deadline for responding for up to 10 days. 5 U.S.C. §552(a)(6)(A); 32 C.F.R. §286.7.

Responsive FOIA documents were due to N1MA! by Jan.1, 2017, nearly three years ago.

The absurdity of this diversionary excuse is demonstrated by the fact that the mailing addresses provided show that the environmental division and the cultural resources division are in the same building at Fort Carson and the FOIA division is one building away – and Army took a full year to respond to N1MA!'s letter to cultural resources.

More seriously, the idea that the environment at PCMS is not part and parcel of the cultural resources office's job is ludicrous, regardless of Army's diversionary "shell game," because even the NHPA recognizes that the setting of historic properties is an essential part of the protection of historic properties, and adverse effects to the environment are also adverse effects to the properties. 36 C.F.R. §800.5(a)(1), (2)(iv).

Undertakings under Section 106 of the NHPA should be coordinated with EAs under NEPA, 36 C.F.R. §800.8. The national Council on Environmental Quality and the Advisory Council on Historic Preservation have even formally adopted a handbook to encourage such coordination.

See www.achp.gov/digital-library-section-106-landing/nepa-and-nhpa-handbook-integrating-nepa-and-section-106;

and

<https://ceq.doe.gov/publications/nepa-handbooks.html>

When undertakings under the NHPA are noticed for public comment, an EA under NEPA should accompany the notice and also be put to public review.

NEPA considerations must include consideration of cultural resources impacts, 36 C.F.R. §800.8(a)(3), and the statute itself demands that a science-based, interdisciplinary approach to environmental impacts is essential. 42 U.S.C. §4332(1)(A).

As N1MA! has repeatedly pointed out, however, Army drafts secret RECs, 32 C.F.R. §651.19, instead of preparing EAs with high-quality scientific analysis, consideration of defined alternatives and public participation as required by NEPA. It then artificially “segments” out cultural resources undertakings and attempts to treat them as somehow “severable” from environmental concerns, which they are not.

All of this violates NEPA on its face and contributes to ongoing violations of the cultural resources programmatic agreement and NHPA.

Everywhere but Army’s Orwellian PCMS, rejecting everything someone says is considered *rejecting* consultation, not *consulting*, and *destroying* something is not considered *saving* it.

PCMS was established, in peacetime, by political greed and corruption. Well-oiled military contractors and political operatives continue to enable undisclosed expansion of the intensity and tempo of military destruction at PCMS, as well as of past and ongoing acquisitions of military real property interests (secret military land expansion), throughout southeastern Colorado.

Rewriting the History of the Dust Bowl; Those Who Fail to Heed History Are Condemned to Repeat It.

Army acknowledges “the fact that” PCMS and southeastern Colorado are at the headwinds of the Great Dust Bowl of the 1930s, but blames that calamity on “drought and poor ranching and farming practices that denuded the landscape of vegetation.” 11/10/20 letter, Encl. 3, p.7.

Attempts to rewrite history are absurd because drought and wind are recurrently present in the semiarid climate at PCMS, as was obvious long before Army chose the site for military training operations.

The Dust Bowl was caused by government policies that *mandated* small-scale agricultural plowing of the native shortgrass rangeland – sodbusting – by homesteaders.

The climate in the Purgatoire River region makes disturbed bare soil extremely vulnerable to the effects of drought and wind erosion, twin conditions that set the stage for the Dust Bowl. Topsoil exposed, following government-required small-scale agricultural plowing, resulted in severe dust storms that caused catastrophic cultural, ecological and economic damage to communities of Colorado, Kansas, New Mexico, Nebraska, Texas and Oklahoma.

Plowing native shortgrass prairie breaks the sod and rips up extensive root systems that build complex biomass that hold soils in place. (Fact: 90% of native shortgrass biomass is below ground, living in the soil. Above ground, we only see 5–10% of the entire plant structure of the richly diverse vegetation found in native shortgrass prairie.) Climatic conditions today are similar to those experienced during the Dust Bowl, and droughts have been experienced more

frequently over the past 40 years than during the decades leading up to the 1930s. The epicenter of the Dust Bowl was Boise City, Oklahoma, and the dust that buried Boise City originated from the Colorado prairie PCMS occupies. Cut the crown of native shortgrass vegetation and uproot its biomass, the resulting exposed lifeless soil is guaranteed to blow.

After the government-mandated sodbusting in the late 19th and early 20th centuries caused the catastrophic Great Dust Bowl, the 442,000-acre Comanche National Grassland was pieced together out of broken homesteads lost in that national calamity. This was set aside as national grasslands under Forest Service management for the purpose of forever ensuring the Great Dust Bowl mistakes would never be repeated.

So, it was shocking when PCMS was established that the Timpas Unit of Comanche National Grassland became PCMS' northern border. Political greed ignored the lessons of the Dust Bowl then. And nonstop deliberate ignorance – intentionally ignoring a fact when one has every reason to believe its existence – has enabled severe soil-disturbing joint-force military operations that dwarf the government policies that led to the Great Dust Bowl to turn 236,000 acres of shortgrass prairie into another dust blowhole at its recognized “headwinds.”

Importantly, Army's running of tanks, Strykers, military vehicles, aviation assets and other weapons systems over the fragile shortgrass prairie *has a more massive effect than 19th century plowing in destroying vast acreage and extensive root systems that hold the highly erodible soils during climatic (water and wind) events.*

Army has long ignored scientific articles in peer-reviewed journals, such as studies conducted on the PCMS by D. G. Milchunas and others (Milchunas, D.G., et al. “Plant community responses to disturbance by mechanized military maneuvers.” J. Environ. Qual. 28:1533-1547, 1999; and “Plant community structure in relation to long-term disturbance by mechanized military maneuvers in a semiarid region.” Environ. Manage. 25:525-539, 2000) that also concluded that the distinctive/documentable impacts of *tracking by military vehicles represent a soil disturbance that leads to an ecological shift from a deep-rooted, wind-resistant, soil-protecting vegetative cover to a shallow-rooted flora prone to severe wind erosion in periods of drought.*

Fugitive dust and erosion in general are irreversible consequences of surface disturbance by military operations in this ecological landscape. Inevitably, such damage delivers severe consequences to the stability of the southern Great Plains ecosystem and its ability to support existing communities and economies. Fugitive dust is the most critical on-site issue, as well as the most important off-site issue, because PCMS sits at the headwinds of the Dust Bowl and dust generated from the damage on this site predictably gives rise to dust storms.

Those who fail to understand history are condemned to repeat it, as was obvious from before PCMS was established.

Certainly, those who fail to understand history are also in an especially poor position to attempt to “preserve” history, as the after action and annual reports show.

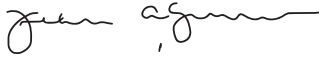
Termination of PA

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

In the future at PCMS, *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 NHPA and NEPA.

Should Army, in the future, send a responsive letter dismissing everything N1MA! has said herein, the failure of N1MA! to respond further should not be considered proof that such a dismissive letter “resolves” N1MA!’s concerns – only that Army has dismissed them without taking any meaningful responsive steps to address them.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Jean Aguerre'.

Jean Aguerre for Not 1 More Acre!

cc: SHPO
ACHP
Angie Bell, NEPA Manager
Roger Peyton, Environmental Division
FOIA/PA Officer
John Wachter, Compliance Officer



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 27, 2021

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

Dear Ms. Aguerre:

Thank you your correspondence dated December 14, 2020, concerning the fiscal year (FY) 2020 Annual Report for the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). Although we have provided discussions and descriptions to the contrary in previous correspondence, you continue to allege that USAG Fort Carson is violating the National Historic Preservation Act, National Environmental Policy Act, and PCMS PA. Our repeated, detailed explanations do not appear to have assuaged your concerns. While we always appreciate your comments, repeatedly answering the same comments diverts USAG Fort Carson staff time and resources from the management of cultural resources and other duties. Please refer to USAG Fort Carson's previous responses to your comments concerning cultural resources management at Fort Carson and Piñon Canyon Maneuver Site. These include, but may not be limited to:

- June 24, 2021, response to April 30, 2021, letter concerning the proposed construction, operation, and maintenance of a cellular tower at PCMS (2019-285).
- November 10, 2020, response to December 17, 2019, letter concerning the FY2019 Annual Report for the PCMS PA;
- July 20, 2020, response to April 29, 2020, letter concerning the proposed construction of elevated maneuver trails at PCMS (2020-057).
- December 20, 2019, response to October 22, 2019, letter concerning the proposed operation of the MQ-1C Gray Eagle or similar unmanned aerial systems within the national airspace between Fort Carson and PCMS and above PCMS (2019-321);
- February 25, 2019, response to December 14, 2018, letter concerning the FY2018 Annual Report for the PCMS PA;

- March 9, 2018, response to January 30, 2018, letter concerning proposed amendments to the PCMS PA.
- January 18, 2018, response to January 16, 2018, letter concerning proposed amendments to the PCMS PA;
- December 20, 2017, response to November 27, 2017, letter concerning proposed amendments to the PCMS PA;
- December 20, 2017, response to November 16, 2017, letter concerning the FY2017 Annual Report for the PCMS PA;
- May 19, 2017, response to May 16, 2017, letter concerning the proposed Range Ride Special Event at PCMS (2017-200).
- December 28, 2016, response to October 21, 2016, letter concerning the draft Integrated Cultural Resources Management Plan.

We will be happy to address any new concerns you may have, but we cannot continue to respond individually to specific comments that have been previously addressed.

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,

Carlos Rivero-deAguilar
Chief, Environmental Division