

The following presents the Fiscal Year (FY) 2018 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 (86 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 [60 pages; Enclosure 5 – Fort Carson Downrange PA Appendix 2 (Updated October 31, 2018) has been excluded from the public version]*
- 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 [188 pages; Enclosure 6 – PCMS PA Appendix 2 (Updated October 31, 2018) and portions of Enclosure 7 – Past Four Brigade Training Exercises Documentation have been excluded from the public version]*

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FISCAL YEAR (FY) 2018 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, 2018

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, 2017, through September 30, 2018, and is formatted in accordance with Appendix D. It has been distributed electronically to the SHPO and concurring parties and is available online at: <http://www.carson.army.mil/organizations/dpw.html#three>.

I. Exempted Undertakings

Table 1 of Enclosure 1 lists all exempted undertakings that have been reviewed by the Fort Carson Cultural Resources Management Program (CRMP) between October 1, 2017, and September 30, 2018. Two hundred twenty undertakings were reviewed that were considered exempted in accordance with Appendix C of the Fort Carson Built Environment PA.

II. Non-Exempted Undertakings

Table 2 of Enclosure 1 lists all undertakings within the areas of potentials effects (APEs) covered by the Fort Carson Built Environment PA that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA). Eight undertakings required Section 106 consultation.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRMP. These 17 undertakings include document reviews, undertakings with no potential to effect historic properties, and undertakings postponed or cancelled prior to review.

III. Actions Update

A. Cultural Resources Awareness Training

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

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated August 2017 (Enclosure 2)
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; available online at: <http://www.carson.army.mil/organizations/dpw.html> (click on the link titled “DPW Programs and Services” on the left side of the page, then scroll up half a screen)
- Cultural Resources Awareness Video – available online at: <http://www.carson.army.mil/organizations/dpw.html#three>

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

No comments on the cultural awareness training materials were received from the SHPO or concurring parties from the FY2017 Annual Report.

B. Inventory and Survey of the APEs

There were no cultural resource surveys conducted within the APEs during the reporting period.

C. Exempted Undertakings

See Table 1 of Enclosure 1. As of September 30, 2018, 220 undertakings were reviewed that are considered to be exempted undertakings in accordance with Appendix C of the Fort Carson Built Environment PA.

D. Expanding the APEs for Exempted Undertakings

The APEs have not been expanded during the reporting period.

E. Inadvertent Discoveries

There were no inadvertent discoveries during the reporting period.

F. Emergency Response per 36 CFR 800.12

Per 36 CFR 800.12(d), fire suppression activities associated with the Bayonet Wildland Fire event are considered immediate rescue and salvage operations conducted to preserve life or property, and as such, are exempted from the provisions of Section 106. The wildland fire started on March 4, 2018, with fire suppression activities concluding on March 6, 2018. Approximately 271 acres within the Main Post, south of Titus Boulevard and west of Bad Toelz Road, near Gate 5 were impacted. There are no historic properties within the wildland fire footprint.

A wildland fire in the Small Arms Impact Area started April 8, 2018, with fire suppression activities concluding on April 9, 2018. Approximately 3,011 acres were impacted. There are no historic properties within the wildland footprint.

G. Amendment

The First Amendment to the Fort Carson Built Environment PA was executed on March 23, 2018. This amendment extends the expiration date for the PA from March 23, 2018, to December 31, 2019. The PA was extended to provide time to consult on a new PA.

H. Dispute Resolution

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

Report compiled by:

Jennifer R. Kolise
Cultural Resources Manager

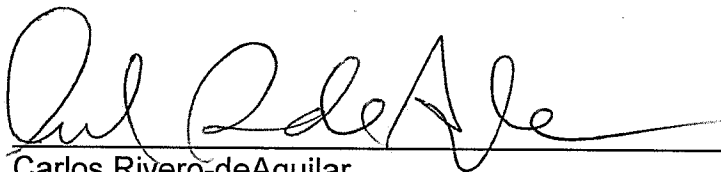
Approved by:



Wayne Thomas
Chief, NEPA and Cultural Management Branch

7 Nov 2018

Date



Carlos Rivero-deAguilar
Chief, Environmental Division

7 NOV 2018

Date



Hal Alguire
Director, Public Works

8 Nov 2018

Date

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ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY18 REPORTING PERIOD (OCTOBER 1, 2017, THROUGH SEPTEMBER 30, 2018) 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
2018-001, 2018-004, 2018-119, & 2018-205 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/10/2017 10/25/2017 2/8/2018 4/16/2018	<p>2018-001 is the initial review for the project. 2018-004 and 2018-119 are reviews of proposed scope changes; and 2018-205 is an updated NEPA review, as it has been over six months since last reviewed and portions of the project had not been initiated.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in February 2018 for portion of the project within the Turkey Creek Complex (see Table 2).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</p>
2018-003 Install Sign Posts for Dedicated Parking Spaces, Bldg 2132	3BD18-002	Main Post	BE I.A2	10/5/2017	
2018-006 Remove Wooden Pedestrian Bridge and Concrete Bridge Abutments near Bldg 8100	SO 867055	Main Post	BE I.A3	10/11/2017	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-007 Replace Cubicles and Carpet in Installation Property Book Office (Rm 210), Bldg 330	TEN17-050	Main Post	BE I.A2	10/11/2017	
2018-008 Replace Spill Buckets, Bldg 900 (AAFES Express)	TEN15-509	Main Post	BE I.A2	10/12/2017	2018-008 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2015-165.
2018-011 Install Electrical/Hydraulic Drum Crusher in Bldg 9244	DPW17-073	Main Post	BE I.A2	10/16/2017	
2018-012 Improvements to the Maneuver Area Training Equipment Site (MATES) Facility Access Gate 1 near Bldg 9100	TEN18-001	Main Post	BE I.A1 BE I.A2	10/17/2017	Work will consist of preparing the ground and pouring 240 square feet of reinforced concrete and the movement of three steel bollards for gate access controls.
2018-015 Install Exterior Deadbolt on Rm 203 and Install Security Bars and Access Ports for Ducts, Bldg 3605	3BD18-001	Main Post	BE I.A2	10/18/2017	
2018-016 Demolition of LAMS-A Hangar Tent, Butts Army Airfield (BAAF)	BAA18-002	Main Post	BE I.A3	10/18/2017	LAMS-A Hangar Tents are quick-to-erect, clear-span, fabric-covered, rapid-deployment aircraft maintenance shelters and/or hangar systems. The LAMS-A Hangar Tent was damaged during a recent storm and needs to be torn down, so that it can be turned in.
2018-017 Construct Helicopter Landing Zone, 10th Special Forces Complex	n/a	Main Post	BE I.A1	10/19/2017	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-019 & 2018-320 Building Renovations, Bldg 1456	DPW17-059	Main Post	BE I.A2	10/19/2017	<p>On the right and left sides of the building, replace two sinks with water fountains. In each of the four classrooms, install speakers in the drop ceilings that connect to the projector and media system, and install floor mounted door stops.</p> <p>Both 2018-019 & 2018-320 are updated NEPA reviews for the project, as it had been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-038.</p>
2018-021 Key Core Installation, Bldgs 2602, 2603, 2604, 2605, & 2607	3BD18-003	Main Post	BE I.A2	10/24/2017	<p>Prior to occupation of the buildings by the 3-29 Field Artillery (FA), each building requires key cores to be shuffled between all of the doors. Additionally, the 3-29 FA needs copies of all the cores to establish key control for each facility.</p>
2018-022 Replacement of Double-Wide Trailer, Cheyenne Mountain Shooting Complex	MWR18-001	Main Post	BE I.A1 BE I.A2 BE I.A3	10/24/2017	<p>Existing double-wide trailer will be removed and replaced with new trailer. Utilities will need to be disconnected from existing trailer and reconnected to new trailer.</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
2018-023 FY18 Survey for and Abatement of Asbestos-Containing Materials / Lead-Based Paint at Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS-wide	BE I.A2 BE I.C2 BE I.D1i BE I.D2i BE I.D3c BE I.D4 FC D1b PC A2b PC B4a2 PC C3a1 PC D3a1	10/31/2017	Surveys for and/or abatement of asbestos-containing materials and lead-based paint must be conducted prior to carpet removal and/or installation, building renovation activities, and ground-disturbing activities.
2018-024 Construct an 11-Station Obstacle Course and an Addition to Running Path across from Intersection of Wetzell Ave and Polio St	4ID18-001	Main Post	BE I.A1	10/31/2017	
2018-025 Install Multiple Card Reader/Keypad Systems to Access Doors, Bldgs 7400, 7402, 7404, & 7412	SFG18-002	Main Post	BE I.A2	11/1/2017	
2018-026 Repair Loading Dock Masonry Wall, Garage Door, and Track, Bldg 520	TEN18-004	Main Post	BE I.A2	11/2/2017	
2018-030 Replace Community Antenna Television (CATV) Line between Bldgs 4508 and 4512	MWR18-002	Main Post	BE I.A2	11/15/2017	
2018-031 Install Community Antenna Television (CATV) Service Drop from Intersection of Woodfill Rd & Mekong Rd to Light Pole, Bldg 6271	MWR18-003	Main Post	BE I.A1	11/15/2017	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-032 Combat Aviation Brigade (CAB) FY15 Aircraft Maintenance Area	PN 77305	Main Post	BE I.A1 BE I.A3	11/15/2017	2018-032 is the review of the Environmental Protection Plan for the construction of an Attack Battalion Hangar. Undertaking has been previously reviewed under NEPA project numbers 2014-587, 2015-063, 2015-123, 2015-148, 2015-347, 2015-481, 2016-145, 2016-232, 2016-394, & 2017-323.
2018-033 Ducting Modifications to the Aviation Combined Arms Tactical Trainer (AVCATT), Bldg 9638, Butts Army Airfield (BAAF)	DPT17-014	Main Post	BE I.A2	11/17/2017	Due to an Army-wide environmental control unit (ECU) modification of the Aviation Combined Arms Tactical Trainer (AVCATT), the existing supply and exhaust ducting connections to the AVCATT must be modified to meet the new ECU dimensions.
2018-034 Install Power Supply for Stak System, Bldg 7465	SFG18-004	Main Post	BE I.A2	11/17/2017	A Stak system is required to aid in the movement and storage of heavily weighted equipment and supplies. In order to run the system, a new 30 amp breaker/overcurrent protection device (OCPD) along with associated 10-inch wire and electrical metallic tubing (EMT) conduit will need to be installed.
2018-036 Replace Chiller #2 & 3 at Bldg 1864	DPW16-058	Main Post	BE I.A2	11/22/2017	Replace the chilled water pumps and valves in the building. 2018-036 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2016-393 & 2017-299.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-038 Install Data Drops and Electrical Outlets in Pharmacy, Bldg 1525 (Mountain Post Soldier Center)	MED18-002	Main Post	BE I.A2	11/28/2017	
2018-040 Clover Ditch Maintenance, Fort Carson	SO 876620	Main Post	BE I.B2	11/28/2017	Reshape the ditch banks and flow line to prevent erosion at the out fall of the culvert. Install rip rap on the culvert end that is dropping into Clover Ditch. Disturbance will be approximately 50 feet long and 20 feet wide or less repaired with rock.
2018-041 & 2018-263 Benham & Blair Barracks Quad Improvements, Bldgs 2144 & 2156	DPW18-003	Main Post	BE I.A1 BE I.A2 BE I.A3 BE I.B1 BE I.B2 BE I.B3	12/4/2017 6/4/2018	Demolish Bldg 2155, and reroute hub communication lines that support the surrounding barracks. Renovate Bldg 2156 for laundry / CQ desk, and add covered patio to east side. Convert basketball court to level asphalt pad. Add landscaping rock to grounds. Place bollards/bollards for perimeter access control. Repair/replace damaged sidewalks. Install rubberized physical training (PT) pit. 2018-041 is the initial review of the project; 2018-263 is the review of the Request for Proposal.
2018-042 Doorbell Replacement, Bldg 7495	MED18-003	Main Post	BE I.A2	12/5/2017	Replace the existing wireless doorbell with a hard-wired doorbell to provide better service and durability than the wireless doorbell.
2018-043 Paint Four Designated Parking Spaces, Bldg 1202	4ID18-003	Main Post	BE I.A2	12/5/2017	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-044 & 2018-127 Building Renovations, Bldg 1959	SPC16-001 PN 67137	Main Post	BE I.A2	12/5/2017 2/14/2018	<p>The renovation includes the installation of card readers, electromechanical combination locks, bars on windows, intrusion detection system, etc., as well as construction of walls and doors.</p> <p>2018-044 is the preliminary submittal of the Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. 2018-127 is the 100% design review.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2017-013, 2017-296, & 2017-384.</p>
2018-045 Install Data Drops and Electrical Outlets in JPPSO Office, Bldg 1525 (Mountain Post Soldier Center)	DPW18-048	Main Post	BE I.A2	12/5/2017	
2018-048 Paint Command Suite, Bldg 7400	SFG18-005	Main Post	BE I.A2	12/6/2017	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-049, 2018-144, 2018-310, & 2018-345 Quarterly Record of Environmental Consideration (REC) for Training	DPT18QTR2 DPT18QTR3 DPT18QTR4 DPT19QTR1	Main Post Downrange Fort Carson PCMS-wide	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/11/2017 2/2/2018 7/27/2018 9/7/2018	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.
2018-050 Install Integrated Commercial Intrusion Detection System (ICIDS) at ARMAG, Bldg 8999	SMC14-003	Main Post	BE I.A1 BE I.A2	12/11/2017	Install Integrated Commercial Intrusion Detection System (ICIDS) at the ARMAG. In order to activate the ICIDS, power and communications lines will need to be installed to the pedestal. 2018-050 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2014-314.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-051 Electrical Upgrades, Bldg 8152	TEN18-006	Main Post	BE I.A2	12/13/2017	A new 220V outlet for a battery charging station is required. The outlet will be placed on the exterior of the building about one foot from the ground. The north wing of the building needs 9 ground fault circuit interrupter (GFCI) receptacles to be installed, and the east wing needs 17 GFCI receptacles installed. Every other bay requires an electrical grounding rod embedded in the concrete floor for fuel trucks to connect to while maintenance is performed indoors.. An exit light needs to be installed on the east wing above the exit door.
2018-052 Construct Interior Walls to Create Three New Office Spaces, Bldg 7476	SFG18-007	Main Post	BE I.A1 BE I.A2	12/13/2017	Construct walls using metal framing and drywall to create three new office spaces. One pre-hung door will be placed in each office for entry. Walls will be 8-foot tall so as not to interfere with fire suppression and heating, ventilation, and air conditioning (HVAC) systems.
2018-053, 2018-128, & 2018-175 Building Renovations, Bldg 2060	SPC16-002	Main Post	BE I.A2	12/19/2017 2/14/2018 3/26/2018	Work includes ceiling tile repair/replacement, carpet replacement, door installation, and sign installation. 2018-053 is the 60% design review; 2018-128 is the 100% design review; and 2018-175 is the corrected 100% design review. Undertaking has been previously reviewed under NEPA project numbers 2017-014, 2017-211, & 2017-243.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-054 Relocate Generator from Bldg 1430 on Fort Carson to Bldg 7330 at the Arrival/Departure Air Control Group (A/DACG) Rapid Deployment Facility near the Colorado Springs Airport	DPT18-003	Main Post A/DACG Rapid Deployment Facility	BE I.A3	12/19/2017	Work includes removing the generator from its current location to the A/DACG facility and demolishing the concrete pad upon which it sits. Section 106 consultation was completed in January 2018 for placing the generator at the A/DACG facility (see Table 2).
2018-055 Construction of a Space and Missile Defense Capabilities (SMDC) Institute of Excellence	n/a	Main Post	BE I.A1 BE I.A3	12/18/2017	2018-055 is the requirements analysis review of proposed sites for the Space and Missile Defense Capabilities (SMDC) Institute of Excellence at Fort Carson. Planning charrette was held in January 2018.
2018-056 Install Interior Fence on East End of Bldg 2657	3BD18-004	Main Post	BE I.A2	12/19/2017	Construct an interior fence at east end the building that is approximately 80 linear feet, 12-15 feet high, with two 42-inch walk-through gates.
2018-057 Replace Main Trunkline from Bldg 1369 to Bldg 1660, West Side of Magrath Ave, due to Downed Lines	MWR18-004	Main Post	BE I.A2	12/19/2017	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-058 & 2018-186 Upgrade Automatic Fire Suppression Systems in Bldgs 749, 1511, 2392, 2492, 2692, & 2792	DPW16-026	Main Post	BE I.A2	12/20/2017 4/3/2018	Upgrades are required for the fire suppression systems in these buildings to be compliant with the Unified Facilities Code (UFC) and National Fire Protection Association (NFPA) code requirements. 2018-058 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated; 2018-186 is the Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. Undertaking has been previously reviewed under NEPA project number 2016-178.
2018-059 & 2018-153 Benham-Blair Barracks Quad Improvements, Bldgs 2255 and 2256	IBD17-001	Main Post	BE I.A1 BE I.A2 BE I.A3 BE I.B1 BE I.B2 BE I.B3	12/28/2017 2/26/2018	2018-059 is the 60% design review; 2018-153 is 100% design review. Undertaking has been previously reviewed under NEPA project numbers 2017-093 & 2017-288.
2018-060 Construct Trap and Skeet Shooting Range, Cheyenne Mountain Shooting Complex	MWR15-008 TEN16-002	Main Post	BE I.A1	1/2/2018	2018-060 is the 100% design review. Undertaking has been previously reviewed under NEPA project numbers 2016-003, 2016-205, 2016-249, 2016-355, 2016-379, 2016-470, 2017-020, & 2017-356.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-061 Conversion of the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) to an Armored Brigade Combat Team (ABCT)	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	1/2/2018	The Army is proposing to convert the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) stationed at Fort Carson into an Armored Brigade Combat Team (ABCT) or re-station and convert to an ABCT at Fort Riley, Kansas; Fort Bliss, Texas; Fort Hood, Texas; or Fort Stewart, Georgia. 2018-061 is the review of the Army's Draft Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impacts (FNSI) for this proposed action.
2018-064 Repair Doors, Bldg 3851 (Incinerator Complex Historic District)	SO 884573	Main Post	BE I.D1h	1/3/2018	Project includes replacing the existing damaged exterior double doors and casing legs with solid core wood doors and new casing; using similar wood and style and paint with matching color (mocha brown).
2018-065 Remove/Replace Electrical Conduit and Underground Wiring behind Bldg 1515	DPW18-051	Main Post	BE I.A2 BE I.A3	1/3/2018	The project consists of unhooking the power from utility box at pole and from building, digging a new 24-inch trench to replace new electrical wire and conduit that hooks back to box, and reconnecting power to the building with no splice underground.
2018-066 Energy Conservation Investment Program (ECIP) Boiler Upgrades, Bldgs 238, 501, 749, 1011, 1012, 1013, 1048, 1220, 1550, 1829, 1843, 5950, 7402, 7404, 7450, 7462, 8100, 8142, 8152, 8200, 8930, & 9500	PN 82215	Main Post	BE I.A2	1/3/2018	2018-066 is the 60% design review. Undertaking has been previously reviewed under NEPA project numbers 2017-134, 2017-257, & 2017-337.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-067 Reconnect Utility Services in Bldgs 300 & 301	DPW18-052	Main Post	BE I.A2	1/3/2018	
2018-068 Re-apply Road Base to Gravel Yard at Bldg 330	TEN18-012	Main Post	BE I.A2	1/8/2018	
2018-069 Improvements to the Bldg 7431 (Indoor Baffle Range)	SFG18-008	Main Post	BE I.A2	1/10/2018	Install 14 structural support bridges (TCT 4 Retrofit Bridge Package w/ Boom kits) over the bullet trap frame to ensure the mouth of the trap retains the 1/2 inch opening required for proper usage.
2018-070 Gate 4 Improvements	DPW18-002	Main Post	BE I.A1 BE I.A2	1/10/2018	Construct/fabricate and install 6-foot high chain-link security swing gates to block the approach to Gate 4. Modify the center island so that vehicles can turn around and exit the Gate 4 approach. Remove and replace the existing 4-foot high chain-link fence with a 6-foot high decorative metal fence along the installation's property line from the new approach gate to the existing decorative metal border fence.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-071 Construct Physical Fitness Shelter	2BD18-001	Main Post	BE I.A1 BE I.A3	1/10/2018	Disassemble damaged LAMS-A Hangar Tent and remove associated transformer at Butts Army Airfield (BAAF). Construct an 80-foot by 200-foot concrete pad inside the field at the 2nd Brigade's track upon which the LAMS-A Hangar Tent will be reassembled. Conversion of the LAMS-A hangar tent to a physical fitness shelter will also include 1) repairing the doors; 2) installing lighting fixtures, data/voice connections, and a panel that will tie to closest vault; 3) installing electrical, mass notification system, HVAC, and communication systems; 4) installing a loop from the water main for fire hydrant(s); 5) reinstalling the transformer at the new location; and 6) moving portions of the existing sprinkler system that conflict with the structure. Disturbed areas will be reseeded.
2018-072 Resurface Gym Floor in Bldg 1829	MWR18-007	Main Post	BE I.A.2	1/16/2018	
2018-073 Construction of an Operations Training Facility, TA Bravo	4ID18-006	Main Post	BE I.A1	1/16/2018	Construction involves digging 800m of anti-tank ditches (5-6 feet deep), less than 50 hull defilade positions for M1 Abrams (18 feet by 32 feet by 5.5 feet), and less than 100 individual fighting positions (less than 5 feet deep). A grader will be used for combat trails.
2018-074 Cable Installation, Bldg 1200	TEN18-009	Main Post	BE I.A.2	1/17/2018	A hole will be drilled through the southeastern corner wall in order to route communication cables through wall into building for staff duty duties.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-075 Water Leak Emergency Repair, Turkey Creek Ranch Historic District	SO 889692 SO 889576	Turkey Creek Complex	BE I.D1b	1/17/2018	Expose water distribution line to find water leak and repair. Thirty-five gallons of water per hour are being lost.
2018-076 Repair Eagle Taxiway/Alpha Ramp at Butts Army Airfield (BAAF)	BAA17-013	Main Post	BE I.A2	1/17/2018	Seal open cracks and joints, and replace sealant where needed at Eagle Taxiway and Alpha Ramp shoulders.
2018-077 Construct a Training Shed at Bldg 8152	TEN18-014	Main Post	BE I.A1	1/17/2018	Project involves the planning, design, and construction of a 7-foot by 15-foot 6-inch by 12-foot 11-inch mobile structure.
2018-078 Construct Moveable Non-Commissioned Officer (NCO) Induction Ceremony Arch, Bldg 1200	TEN18-015	Main Post	BE I.A1	1/17/2018	
2018-085, 2018-167, & 2018-183 FY17 Post-Wide Erosion Projects	PN 86934 DPW17-034 DPW17-035 DPW17-036 DPW17-037	Main Post Downrange Fort Carson	BE I.A2 BE I.B2 FC D1b FC D2a	1/19/2018 3/19/2018 3/22/2018	2018-085 is the 60% design review; 2018-167 is the 100% design review; and 2018-183 is the review of the Environmental Protection Plan. Project numbers DPW17-034 through 037 have been combined into one project. Undertaking has been previously reviewed under NEPA project numbers 2017-101 (DPW17-034), 2017-101 (DPW17-035), 2017-149 (DPW17-036), 2017-217 (DPW17-217), & 2017-287.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-086 & 2018-213 Construction and Operation of a Defense Logistics Agency (DLA) Facility	n/a	Main Post	BE I.A1 BE I.A2	1/22/2018 4/25/2018	<p>The current effort under review consists of interior repair and renovations with some exterior work for upgrading existing loading dock facility, paving, existing administration facility, and existing warehouse facilities (Bldgs 320, 321, 324, 340, 341, 342, & 343).</p> <p>2018-086 is the review of the preliminary design analysis; 2018-213 is the review of the Environmental Protection Plan.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2017-072, 2017-197, & 2017-274.</p>
2018-089 Repaint Yellow Motor Pool Bay Caution Lines, Bldg 8152	TEN18-010	Main Post	BE I.B3	1/23/2018	
2018-090 Electrical Repairs in Rm 216, Bldg 1200, Rm. 216 (Project Cancelled)	TEN18-011	Main Post	BE I.A2	1/23/2018	Replace existing cubicle string outlets with wall outlets. Project was cancelled.
2018-091 Renovate Bldg 1352 (Religious Education Center)	GAR18-005	Main Post	BE I.A2	1/23/2018	Project is to perform cosmetic renovations/upgrades on the building to include: creation of a multi-use worship space, new fire suppression system, removal of storage cages, a new kitchen, and resizing bathrooms. It also Includes upgrades to meet Americans with Disabilities Act (ADA) standards.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-092 Repaint Interior of Bldg 1528	MWR13-032	Main Post	BE I.A2	1/25/2018	2018-092 is a modification to the scope of work, which now includes repainting the interior of Bldg 1528. The original scope only included replacing the carpet/tile; this work has been completed. Undertaking has been previously reviewed under NEPA project numbers 2016-255, 2017-326, & 2017-345.
2018-093 Installation of an Additional Vertical Lift Module Storage, Bldg 330	TEN18-017	Main Post	BE I.A2	1/25/2018	
2018-094 Renovate Bldgs 9090 & 9092	TEN18-002	Main Post	BE I.A2	1/25/2018	Work will consist of the following items: 1) installing five double-bay doors and five single-bay doors with security card reader access systems; 2) replacing five supply room wooden doors with metal doors; 3) replacing four sets of motor pool lights with ones that shine outward; and 4) installing a video camera surveillance system.
2018-095 Renovate 3rd Floor of Bldg 7500 to Accommodate a Sleep Clinic	MED18-004	Main Post	BE I.A2	1/25/2018	Work includes: 1) running cables for patient communication and monitoring systems; 2) installing one set of double doors and one single door in the west corridor; 3) soundproofing four rooms; and 4) mounting miscellaneous items.
2018-096 Convert Rm 235 to a Break Room, Bldg 6222	GAR18-012	Main Post	BE I.A2	1/25/2018	Work includes removing the mechanical roll-down metal door, framing the opening, and finishing with drywall.
2018-097 Paint Rooms 110A and 122, Bldg 5950 (Youth Center)	MWR18-008	Main Post	BE I.A2	1/25/2018	

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2018-098 Dead Tree Removal from Clover Ditch near Bldg 1500	SO 891189	Main Post	BE I.B3	1/29/2018	Removal of fallen and dead trees from the Clover Ditch area behind the barracks in the 1500 area (east of Building 1554), using chain saw, chipper, and pole truck.
2018-099 & 2018-207 St. Lo Culvert Replacement & Iron Horse Park Drainage Improvements	DPW13-117	Main Post	BE I.A1 BE I.A2 BE I.B1 BE I.B2	1/29/2018 4/18/2018	2018-099 is the 60% design review; 2018-207 is the 100% design review. Undertaking has been previously reviewed under NEPA project numbers 2014-116, 2016-407, & 2017-292.
2018-101 Upgrade Fire Suppression System, Bldg 1517	DPW17-089	Main Post	BE I.A2	1/30/2018	Upgrade the existing wet pipe fire sprinkler system, including alarms and controls, to meet current fire codes and provide fire protection to the entire facility.
2018-102 Renovate 1st and 2nd Floors, Bldg 1042	TEN17-008	Main Post	BE I.A2	1/30/2018	2018-102 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project numbers 2017-048 & 2017-083.

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2018-103 Renovate Bldg 1117 (Education Center)	DPT12-003 DPW12-003 PN 78675	Main Post	BE I.A2	1/30/2018	<p>The renovation will include creating classrooms, a large auditorium, office and administration space, and support areas, such as bathrooms, break rooms, and mechanical rooms. New HVAC, lighting, and communication systems will be installed.</p> <p>2018-103 is the 100% design review.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2015-083, 2015-153, 2015-269, 2015-383, 2015-462, 2015-504, and 2017-335.</p>
2018-104 & 2018-282 Replace Fire Suppression Systems, Bldgs 501 and 9633	DPW15-057 FD029-11P	Main Post	BE I.A2	1/30/2018 6/18/2018	<p>Replace the existing dry pipe fire sprinkler system in Bldg 501 to include all piping, fittings, hangers, gaskets, and sprinkler heads. Remove and dispose of all foam, foam containers, actuators, controls piping, valves and other piping components, and install new high expansion foam system.</p> <p>2018-104 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. 2018-282 is the final the Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2015-251, 2016-283, 2016-284, 2016-336, & 2016-384.</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
2018-105 & 2018-327 Repair Bridge P85108	DPW18-054	Main Post	BE I.A2	1/31/2018 8/10/2018	Repairs include slip lining all conduits to repair corroded inverts; armoring the outlet apron to repair undermining; installing bridge end markers; and recoating the northwest embankment with concrete. 2018-327 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.
2018-106 Install Foam Fire Suppression Abort Switches by Exit Door in Bldg 9630	DPW18-049	Main Post	BE I.A2	2/1/2018	
2018-107 Replace Community Antenna Television (CATV) Line from Bldg 1059 and between Bldgs 1046 & 1047	MWR18-010	Main Post	BE I.A2	2/1/2018	
2018-108 Reconfigure Americans with Disabilities Act (ADA) Parking Spaces, Bldg 7500	MED18-005	Main Post	BE I.B3	2/1/2018	Restripe the parking spaces at Parking Lot A to ensure spaces are correctly sized to meet current Americans with Disabilities Act (ADA) requirements.

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2018-109 Replace Fire Suppression Systems, Bldg 9620	DPW16-057	Main Post	BE I.A2	2/5/2018	Project includes the removal of the existing deluge system and underground water supply piping from the water mains to inside the facility; 2) the installation of a new high expansion foam fire suppression system in the bay area and new supply piping from the water mains to the system; 3) replacing the water supply piping from the main to the alarm valve for the existing wet pipe system in the administrative office area; and 4) replacing and upgrading the fire alarm system to meet code requirements.
2018-110 Install Five Additional Electrical Outlets in Southeastern End of Bldg 2657	3BD18-005	Main Post	BE I.A2	2/5/2018	
2018-111 Renovate Domino's Pizza, Bldg 1510	TEN 18-021 TEN18-028	Main Post	BE I.A2	2/5/2018	<p>Remove nonbearing walls and soffit; construct new counter wall and extend soffit; remove existing 2x2 ceiling and can lighting; install new 2x4 ceiling grid and lights. Relocate electrical and communications; relocate front counters and order stations; install new floor tile to match existing kitchen tile; relocate equipment and HVAC diffusers. Option to add a fourth oven (if gas pressure is sufficient); install tracker monitor in hall by overhead gate. Includes installing regulators to reduce gas pressure.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-207 to remodel the existing Wing Zone for use by Domino's Pizza.</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
2018-112; 2018-123; & 2018-146 Repair Tactical Equipment Maintenance Facility (TEMF) Hardstand, Bldg 2492	DPW16-018	Main Post	BE I.A2	2/5/2018 2/13/2018 2/27/2018	2018-112 is the 60% design review; 2018-123 is a review of the Environmental Protection Plan; and 2018-146 is the 100% design review. Undertaking has been previously reviewed under NEPA project numbers 2016-417 & 2017-281.
2018-113 Install Generator and Concrete Pad, Specker Ave and O'Connell Blvd	DIR18-004	Main Post	BE I.A1	2/5/2018	AT&T will install an emergency 50-kilowatt back-up generator on new concrete pad within the existing lease area. Current cellular tower is next to Bldg 846, 1450 Specker Ave.
2018-114 Install a Dry Cooler, Bldg 9651	DPW17-128	Main Post	BE I.A2	2/6/2018	2018-114 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-306.
2018-115 Remove and Replace the Underground Valves on the Butts Army Airfield (BAAF) Fire Distribution System, Fort Carson	DPW18-055	Main Post	BE I.A2	2/6/2018	

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2018-116 Demolish Bldg 7303, Fort Carson	DPW16-050; DPW18-057	Main Post	BE I.A3	2/7/2018	<p>The deconstruction would include abatement/removal of asbestos-containing materials and other regulated materials, disconnecting and capping of utilities, disposing of all debris materials, and restoring the site to a specified condition.</p> <p>2018-116 is an updated NEPA review of the project, as it has been over six months since last reviewed and the project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2016-320 (Deconstruct Multiple Bldgs); 2014-507, 2015-319, 2015-348, & 2016-043 (Facilities Reduction Project Demolition Project); and 2016-303, 2016-482, 2017-031, 2017-105, & 2017-117 (International Hotel Group Candlewood Suites Project - Demolish Existing Hotel to Construct New Hotel).</p>
2018-117 & 2018-321 Construct Concrete Pads at Bldgs 9426, 9436, 9446, 9456, 9466, & 9486	DPW16-065	Main Post	BE I.A2	2/7/2018 8/2/2018	<p>The project is to construct a concrete pad for a petroleum, oils, and lubricants (POL) catch vault valves at these facilities.</p> <p>Both 2018-117 and 2017-321 are updated NEPA reviews of the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-426</p>

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2018-120 Erosion Control Project near Bldgs 7450, 7437, 7438, 7424, & 7440	SFG18-012	Main Post	BE I.B2	2/8/2018	Clear existing soil and organic material from the area approximately 2" deep, cover the area with Geo-Tech materials and stake in place, cover the Geo-Tech in 1 ½-inch rock. The removed top soil will be taken to a soil stock area and managed for future use on the installation.
2018-121, 2018-201, & 2018-246 Replace Alpha Ramp and Alpha West Ramp at Butts Army Airfield (BAAF)	BAA17-007	Main Post	BE I.A1 BE I.A2 BE I.A3	2/13/2018 4/12/2018 5/22/2018	Due to severe cracking and spalling, the work will consist of replacing Alpha Ramp and Alpha West Ramp concrete, asphalt shoulders, lighting, and marking. 2018-121 is the initial review of the project. 2018-201 is the 60% design review. 2018-246 is the final Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet.
2018-124 Install Transformer and Electrical Power Pedestals, Bldg 2135	DPT18-007	Main Post	BE I.A1 BE I.A2	2/14/2018	Install transformer and electrical power pedestals behind the building to support additional tank and Bradley gunnery training device trailers that will be fielded in 2019.
2018-125, 2018-126, & 2018-322 Repair Asphalt, Barkeley Ave from Specker Ave to Titus Blvd (DPW17-115); Improvements to the Wilderness Rd and Warfighter Rd Intersection (DPW18-004); Improvements to the Butts Rd and Airfield Rd Intersection (DPW18-006)	DPW17-115 DPW18-004 DPW18-006	Main Post	BE I.A1 BE I.A2 BE I.B2	2/13/2018 8/6/2018	Project DPW17-115 is the repairs to Barkeley Rd between Specker Ave and Titus Blvd. These repairs include milling and overlay of the asphalt, conducting full depth repairs on areas of the asphalt with structural failures, replacing damaged curbs and gutters, and cleaning out debris from clogged drains that are part of the underdrain system. Project DPW18-004 is the improvements to the intersection at Wilderness Rd and Warfighter Rd.

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					<p>These improvements include construction of wider turn lanes and installation of raised island channelizing medians to improve traffic flow and safety. Also, impacted utilities and features will be adjusted and relocated as necessary. Project DPW18-006 is the improvements to the intersection of Butts Rd and Airfield Rd. These improvements include construction of an additional through lane on southbound Butts Rd at Airfield Rd in order to designate a dedicated right turn lane for northbound Butts Rd onto Airfield Rd and construction of a wider turn lane onto Airfield Rd. Also, impacted utilities and drainage features will be adjusted and relocated as necessary.</p> <p>2018-125 is the initial review for project DPW18-004; 2018-126 is the initial review for project DPW18-006; and 2018-322 is an updated NEPA review of project DPW17-115, as it has been over six months since last reviewed and project had not been initiated. In addition, the intersection improvements (DPW18-004 & DPW18-006) were added to the scope of the project.</p> <p>A portion of the undertaking (DPW17-115 - repair Barkeley Ave) has been previously reviewed under NEPA project number 2017-245.</p>

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2018-131 & 2018-195 Ammunition Supply Point (ASP) Expansion	PN 73375	Main Post	BE I.A1	2/15/2018 4/9/2018	2018-131 is a review of the Explosive Safety Site Plan; 2018-195 is the final Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) package. Undertaking has been previously reviewed under NEPA project numbers 2017-229 & 2017-297.
2018-135 & 2018-330 Remove / Replace Handicap Ramp, Elkhorn	DPW18-056	Main Post	BE I.A2	2/21/2018 8/15/2018	2018-135 is the initial review of the project; 2018-330 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated.
2018-141 Install Fence, Bldg 1860	DPW18-058	Main Post	BE I.A1 BE I.A2	2/22/2018	Install a six-foot security fence with gate from the building along Prussman Blvd, around the convault and gas regulator stations to the west side of Bldg 1860B.
2018-142 Install Backup Generator, Bldg 9633	DPW18-039	Main Post	BE I.A2	2/22/2018	Foam fire protection systems require a backup generator to provide power in the event of a power outage. The proposed action is to install a 480 volt 75 kilowatt generator with an automatic transfer switch in the mechanical room.
2018-143 Repair Loading Dock, Bldg 7500	MED18-006	Main Post	BE I.A2	2/22/2018	Repair/replace the deteriorated concrete forming the approach for the Service Level dock, which has failed at all the expansion joints. The work will need to be phased to allow the loading dock to remain fully functional.

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2018-145 Replace North Loop Chilled Water Line	DPW13-012 DPW13-013	Main Post	BE I.A1 BE I.A2 BE I.A3	2/16/2018	2018-145 is the review of the Environmental Protection plan for the project. Undertaking has been previously reviewed under NEPA project numbers 2014-435, 2014-489, 2015-331, 2016-100, 2016-212, 2016-301, 2016-383, 2017-336, 2017-354, 2017-391, & 2017-392.
2018-147 Repair Drainage Basins near Bldg 6185	MWR17-008 MWR18-012	Main Post	BE I.B2	2/27/2018	2018-147 is the continuation of the work started last year. Undertaking has been previously reviewed under NEPA project number 2017-195.
2018-148 Fill Prairie Dog Mounds near Bldgs 9506-9509, Wilderness Road	DPW18-063	Main Post	BE I.B3	2/28/2018	Work will involve using a Bobcat skid loader or tractor to fill in empty prairie dog mounds on the north and south sides of Wilderness Road. The soil used as fill will be excavated from around each mound to a depth of approximately 8-12 inches.
2018-149 Gate Automation, Bldg 2039	DPT18-009	Main Post	BE I.A1 BE I.A2 BE I.A3	3/1/2018	Project is to replace four gates (vehicle gates and pedestrian gate) with integrated automated gates with power connection. Electrical will be trenched to the gates.
2018-150 & 2018-290 Construction of Two Tactical Equipment Maintenance Facilities (TEMFs) - North TEMF and South TEMF - near Butts Army Airfield (BAAF)	PN 77301	Main Post	BE I.A1 BE I.A3	3/1/2018; 6/25/2018	2018-150 is the 35% design review; 2018-290 is the 65% design review.

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2018-151 Construct 10 Additional Storage Units near Bldg 6185	MWR18-013	Main Post	BE I.A1	2/28/2018	The units are partially pre-built, and will be completed on site. They will be placed on existing concrete surface, and will not have electricity installed.
2018-152 Install Two-Inch Conduit and Fiber between Bldgs 4469 and 4349	MWR18-014	Main Post	BE I.A1 BE I.A2	2/28/2018	Starting near Bldg 4469 traveling north, bore under drainage ditch and Funk Road. Continue along Funk Road then behind the residences on Incheon Road, until arriving behind Bldg 4329 where a fiber node will be installed. Conduit with fiber will be buried 36 to 40 inches deep.
2018-155 Install Security Cameras at Entryways and Inside Rms 120, 130, & 140, Bldg 1280	TEN17-001	Main Post	BE I.A2	3/6/2018	2018-155 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-141.
2018-156 Repair Roof and Paint Siding on Bldg 3660	DPW18-064	Main Post	BE I.A2	3/7/2018	Remove and replace damaged asphalt shingle roof. Pressure wash, and repaint exterior siding.
2018-160 Repair Landfill 8 Road, TA Bravo	DPW17-113	Main Post	BE I.A2 BE I.B2	3/8/2018	Install rip rap armoring and culverts to safely direct water to closest drainage without damaging road. Import coarse fill to regrade eroded portions of road.

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2018-161 Move Education Center Learning Classroom from Bldg 1117 to Bldg 2422	DPW18-065	Main Post	BE I.A2	3/8/2018	Move three video-conference (VTC) computer class rooms from Bldg 1117 to Bldg 2422. Bldg 2422 needs to be reconfigured with power and internet drops to support VTC capability, 17 computers for each classroom, 3 printers, 3 overhead projectors and wall screens, and phones. In addition, the building needs connections for a server rack that controls VTC and computers in all three rooms.
2018-162 & 2018-331 Post-wide Sidewalk Project	DPW18-033	Main Post	BE I.A1 BE I.A2 BE I.A3	3/13/2018; 8/15/2018	Repair by replacement degraded / damaged concrete sidewalk sections, and construct new reinforced concrete sidewalks with handicap-accessible ramps to provide connectivity. 2018-162 is the initial review of the project; 2018-331 is the review of the Request for Proposal.
2018-163 Roof Replacement, Bldg 1351	DPW17-020	Main Post	BE I.A2	3/13/2018	2018-163 is an updated NEPA review for Bldg 1351 (DPW17-020), as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-065 (Roof Replacement, Multiple Bldgs).

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2018-164 Replace Multiple Banana Belt Parking Lots	DPW17-121	Main Post	BE I.A1 BE I.A2 BE I.A3	3/13/2018	Repair degraded asphalt parking lots, concrete curbs and gutters, parking aprons, and adjacent sidewalks. Construct new concrete cross pans, motorcycle parking pads, and handicap-accessible ramps for Bldgs 1959, 2061, 2260, & 2460.
2018-169 Construction of an Operations Training Facility, TA Bravo	4ID18-008	Main Post	BE I.A1 BE I.A3	3/22/2018	Construction involves digging 400 m of anti-tank ditches (5-6 feet deep), less than 15 hull defilade positions for M1 Abrams (18 feet by 32 feet by 5.5 feet), and less than 25 individual fighting positions (less than 5 feet deep). A grader will be used for combat trails.
2018-170 Housing Construction, Ute Hill	n/a	Main Post	BE I.A1	3/22/2018	Balfour-Beatty is proposing to construct eight housing units on Ute Hill, located south of St. Lo Circle.

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2018-171 Construct Open Storage Area in Bldg 9091	TEN18-026	Main Post	BE I.A2	3/22/2018	Convert a portion of the second floor to an Open Secret Storage area, to include a stairway and elevator. Project also includes modification of the first floor. Main Stairs, First Floor: install all new hardware for the lock and latch; new molding around door for sound attenuation; and pinned hinges. Back Stairs: remove handles and install blanks denying access into stairwell from first floor and access to second floor access control panels. Main Stairs, First Floor: install a new door and hard ceiling to create a vestibule between the downstairs fire door and new door. HVAC in one room: install bars and locks for the three exterior access panels, and bars and access port for HVAC vents leading to second floor. Intrusion Detection System: install panel between main stairs and elevator, and conduits and sensors. Install bolt for roof access panel in Rm 205.
2018-172 Repair Shower Floor at Iron Horse Gym, Bldg 1925	DPW16-047	Main Post	BE I.A2	3/22/2018	2018-172 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2016-293.
2018-173 FY18 Invasive Species Treatments	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	3/22/2018	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.

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2018-176 Reposition/Replace Air Conditioning (AC) Units, Bldg 2039	DPW17-049	Main Post	BE I.A2	3/26/2018	<p>The project is to relocate the air conditioning units in eight rooms in the buildings, since they are inaccessible for routine maintenance. Units will be either roof mounted or floor mounted inside the rooms. Assume disturbance to walls, floors, ceiling, and roof of facility.</p> <p>2018-176 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-497.</p>
2018-177 Install Emergency Generator System, Bldg 1525	MED18-007	Main Post	BE I.A1 BE I.A2 BE I.A3	3/26/2018	<p>Install a natural gas stand-by emergency generator for the building (SRP Site). The generator will service only the medical portion of the SRP to include five refrigerators / freezers and two communication closet data racks. Each of the loads will be fed with a dedicated 20 amp circuit.</p>
2018-179 Install Cart Wash System, Bldg 7500	MED18-008	Main Post	BE I.A2	3/27/2018	
2018-180 Install Artificial Turf for Physical Training (PT) Field	TEN16-064	Main Post	BE I.B3	3/28/2018	<p>2018-180 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-070.</p>

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2018-181 Repair Cooling Tower, Bldg 7501	MED18-009	Main Post	BE I.A2	3/29/2018	Repair the failing cooling tower to include the concrete structure supporting the cooling tower, the fill, spray nozzles and fans. This project includes repair of the concrete deck surface under the cooling tower to include the condenser water sump. The repairs will require sandblasting the floor and sump surfaces to remove any past repair attempts, past coatings, and/or any failed or failing concrete.
2018-182 Repair Roof and Paint Exterior of Building 10015 (Dude String Barn), Turkey Creek Ranch Historic District	4ID17-010	Turkey Creek Complex	BE I.D1d BE I.D1f	3/29/2018	2018-182 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Section 106 consultation has been completed in March 2017 for portions of the project (see Table 2). Undertaking has been previously reviewed under NEPA project number 2017-163.
2018-184 Remodel Bldgs 2419 and 2423 to Create Classrooms	4ID16-007	Main Post	BE I.A2	3/30/2018	2018-184 is an updated NEPA review of the project, as it has been over six months since last reviewed and project has not been initiated. Original scope of work has been updated to include remodeling Bldg 2419. Undertaking has been previously reviewed under NEPA project number 2016-493.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-185 Construct Climbing Bar Pods at Bldgs 2077 and 2350	1BD18-010	Main Post	BE I.A1	4/2/2018	Post holes will be dug on the north end of Bldg 2077 and southeast end of Bldg 2350 for the installation of climbing bar pods.
2018-188 Air Compressor Optimization, Motor Pools Post-wide	DPW17-117	Main Post	BE I.A2	4/3/2018	<p>Install electric control valve downstream of compressor storage tank on 48 compressed air systems to isolate system in off-hours. Run control wiring from existing JACE in mechanical room. Utilize existing conduit where possible, then add necessary conduit to complete routing to valve. Add heat recovery module to 12 larger screw compressors and duct to occupied vehicle maintenance areas with thermostatically controlled actuator and damper. Add variable speed drives to 12 larger screw compressors with local control based on line pressure.</p> <p>2018-188 is an updated NEPA review of the project, as it has been over six months since last reviewed and project has not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-305.</p>
2018-189 Install Three Streamflow Data Collection Gauges in Clover Ditch	DPW17-119	Main Post	BE I.B2	4/3/2018	<p>2018-089 is an updated NEPA review of the project, as it has been over six months since last reviewed and project has not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-276.</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
2018-190 10th Special Forces Group (SFG) (A) Diver Locker Interior Renovations, Bldg 7400	n/a	Main Post	BE I.A2	4/4/2018	Project consists of interior repair, renovations, and upgrades to the existing building to ensure it meets all criteria for contamination control technology and provides a clean environment for the storing, filling, and maintaining of 2018-190 is a review of the final Request for Proposal.
2018-191 Construction / Repair Projects at Bldgs 7501 and 7504	MED18-010	Main Post	BE I.A1 BE I.A2 BE I.B2	4/4/2018	The project consists of repairing the grounds around the hospital's fuel tanks and storage shed to include removal of silt from around the fuel tanks and shed, and construction of a new retaining wall in the same area.
2018-192 Install Five Reserved Parking Signs at Bldg 7503	MED18-011	Main Post	BE I.A1 BE I.A2	4/4/2018	
2018-193 Repair Domestic Heat Exchangers in Benham & Blair Barracks	DPW17-029 DPW18-029	Main Post	BE I.A2	4/5/2018	2018-193 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-373.
2018-194 Remove Cable Box from Bldg 2256 and Install Cable Line Between Bldgs 2252 & 2253	MWR18-020	Main Post	BE I.A1 BE I.A2	4/6/2018	This will require 110 feet of directional bore at a depth of 24 inches starting at Bldg 2252, going to Bldg 2253.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-196 & 2018-348 Construction and Operation of a Battlefield Weather Detachment Facility	MCA17-003 PN 81283	Main Post	BE I.A1 BE I.A3	4/10/2018; 9/7/2018	2018-196 is the final Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. 2018-348 is the final design review. Undertaking has been previously reviewed under NEPA project numbers 2017-225 & 2017-383.
2018-197 & 2018-281 Tactical Equipment Maintenance Facility (TEMF) Renovation, Bldg 2492	DPW16-056	Main Post	BE I.A2	4/10/2018 6/18/2018	Project includes: 1) repair fire suppression system to meet current codes; 2) realign interior walls to improve functionality of spaces for current maintenance operations; 3) modernize wall, flooring, and ceiling finishes to sustain industrial / maintenance operations; 4) repair lighting by replacing with fixtures appropriate to current use; 5) repair restrooms to meet current codes and efficiency standards; and 6) repair HVAC/mechanical room equipment and exterior doors/windows for improved efficiency and life-cycle maintenance. 2018-197 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated; 2018-281 is the final Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. Portions of this undertaking have been previously reviewed under NEPA project numbers 2017-244 (Install Maintenance Pit Grates, Multiple Bldgs); 2016-178 & 2017-270 (Upgrade Automatic Fire Suppression Systems, Multiple Bldgs);

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
					and 2015-197, 2016-091, & 2016-146 (ECIP Radiant Heaters, Multiple Bldgs).
2018-198 Repair / Upgrade Electrical System, Bldg 7470	SFG17-002	Main Post	BE I.A2	4/12/2018	Replace circuit breaker and damaged buss bar within damaged panel. Add additional power circuits to support the fabrication shop electrical requirements.
2018-200 Ditch Maintenance West of Harr St, and Construction of Four Check Dams across Ditch along O'Connell Blvd	SO 905605	Main Post	BE I.A1 BE I.B2	4/11/2018	Clean sediment from ditch line west from Harr St and from box culvert and each side of bridge concrete aprons. Construct four check dams across ditch line along O'Connell Blvd.
2018-202, 2018-248, & 2018-283 Install / Relocate Portable Armory Complexes at Bldgs 1048 and 2492	DPW18-069	Main Post	BE I.A1 BE I.A2	4/12/2018 5/22/2018 6/20/2018	<p>Install one portable S-2 Vault at Bldg 1048, and eight portable arms rooms at Bldg 2492. Construct FE-6 fence with gates, perimeter lighting, gravel pads, and electrical and fiber infrastructure. Bldg. 2492 will have a hand hold box installed, but will not have additional fencing installed. ARMAGS will be relocated from the south side to the north side of the motor pool on a gravel section; this will require digging to install power and ICIDS.</p> <p>2018-202 is the initial project review for installation of the vault and fence at Bldg 1048. 2018-248 is a change in scope in which the work occurring at Bldg 2492 was added. 2018-283 is another change in scope in which the relocation of the ARMAGS was included.</p>

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2018-204 Install New Electrical Lines from the Intersection of Butts Rd and Titus Blvd to Evans Hospital	C) w912DY-15-D0005-0003	Main Post	BE I.A1 BE I.A2	4/11/2018	Existing conduits (no disturbance) from substation to Bldg 7493 will be reused; then, there will be open trenching the rest of the way with possible boring under the parking lot and the creek near St. Lo.
2018-206 Ditch Maintenance East of Crows Foot Gate on Range 63	SO 910487	Main Post	BE I.A2 BE I.B2	4/16/2018	The work consists of clearing the ditch of debris, installing a culvert, and building the trail back over top of culvert.
2018-209 Renovate Bldg 3660	DPW18-071	Main Post	BE I.A2	4/20/2018	The work involves patching and painting the interior ceiling and walls, and replacing door frames.
2018-210 Spartan Race 2018	n/a	Main Post	BE I.A1 BE I.A3 BE I.B1	4/20/2018	Construct and demolish obstacles for the annual Spartan Race.
2018-211 Upgrade Java Application Control Engine Building Controllers in Bldgs 1957, 1958, 2057, 2058, 2077, 2078, 2144, 2146, 2157, 2158, 2257, 2258, 2340, 2344, 2346, 2457, 2458, 2557, 2558, 2757, 2758, 2605, 2615, 2635, 2645, 2655, 9426, 9436, 9446, 9456, 9466, 9471-9474, & 9486	DPW17-134	Main Post	BE I.A2	4/23/2018	2018-211 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-359.
2018-212 & 2018-346 Install a Battery Energy Storage System near the Minick Substation	DPW17-133	Main Post	BE I.A1	4/23/2018 9/7/2018	Both 2018-212 & 2018-346 are updated NEPA reviews, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-358.

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2018-214 Replace Drainage System in Parking Lot at Mister St and Specker Ave	DPW17-062	Main Post	BE I.A2 BE I.B2	4/25/2018	The project includes regrading the gravel parking lot, improving the drainage swales, relocating the existing eastern driveway and culvert, installing drainage swales to mitigate sediment transport and riling throughout parking lot and Mister St, and realigning the existing parking blocks for revised parking patterns.
2018-215 Install Automatic Garage Door Opener to Warehouse Bay #3, Bldg. 308	DPW18-075	Main Post	BE I.A2	4/26/2018	
2018-216 Replace Main Wayfinding Directories with Electronic Touchscreen Directories in Bldgs 7500 and 7503	MED18-012	Main Post	BE I.A2	4/26/2018	
2018-217 Upgrade Interior Lighting, Bldgs 756, 758, 100, 2144, 2146, 2340, 2344, 2346, 5939, 7438, 7450, & 8930	DPW17-135	Main Post	BE I.A2	4/23/2018	<p>In barracks, only common areas are being addressed under this contract by replacing fluorescent bulbs with light emitting diode (LED) bulbs. In the other buildings, retrofits will consist of re-lamping with LEADs and re-ballasting in some, replacing high bay fixtures with LED fixtures, and installing screw-in LEDs.</p> <p>2018-217 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-360.</p>

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2018-218 Convert Inlet Guide Vane Air Handlers to Variable Frequency Drive Air Handlers, Bldgs 1200, 1201, 5950, 7400, & 7402	DPW17-136	Main Post	BE I.A2	4/23/2018	2018-218 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-361.
2018-219 Convert Constant Volume Hydronic Pumping Systems to Variable Flow Operations, Bldgs 8471-9474	DPW17-137	Main Post	BE I.A2	4/23/2018	2018-219 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-362.
2018-221 Install Sign Pole at Bldg 7503	MED18-013	Main Post	BE I.A1	5/1/2018	
2018-222 Install Soldiers Memorial Stone at Gate 1, Fort Carson	DPW18-080	Main Post	BE I.A1	5/1/2018	
2018-223 Foundation Settlement Repair at Bldg 7431 (Indoor Baffle Range)	SFG18-010	Main Post	BE I.A2	5/1/2018	The project will correct the foundation settlement and repair the damage to the exterior and interior of the Indoor Baffle Range that has occurred since the building was renovated in 2014. The foundation settlement has caused cracks and fractures to occur in various floors and walls throughout the building, as well as causing several doors to not function properly.
2018-224 Demolition of Abandoned School, Bldg 5510	DPW18-079	Main Post	BE I.A3	5/1/2018	

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2018-225 Repair Drainage near Bldg 7440	SFG17-013	Main Post	BE I.A1 BE I.A2 BE I.B2	5/1/2018	Two courses of action (COAs) are being discussed. 1. Construct a 79-foot by 6-foot French drain between the two overhead doors of the western addition of the building; 2. Construct a 440-foot by 6-foot French drain around the northern, western, and eastern exteriors of the building. Both COAs include installing a 13-foot by 23-foot awning over the northwestern overhead door of the building. IF COA 1 is chosen, the culvert to the storm drain on the northwest corner of the building will need to be lowered approximately 2 feet less than the current grade.
2018-226 Install Two Arms Room/Ammunition Storage Containers at the Cheyenne Mountain Shooting Complex, Fort Carson	MWR17-013	Main Post	BE I.A1	5/1/2018	2018-226 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-339.
2018-229 Construction of Three Company Operations Facilities (COFs) near Butts Army Airfield (BAAF)	PN 77303	Main Post	BE I.A1 BE I.A2	5/8/2018	2018-229 is the 35% design review.

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2018-230 Renovate 2nd floor, Bldg 8000	TEN15-504	Main Post	BE I.A2	5/9/2018	<p>Replace HVAC system, restroom exhaust fans, existing lighting, window shades and film, walls and doors, and electrical and communications systems. The renovated area will need to be painted.</p> <p>2018-230 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2015-126, 2016-322, & 2017-068.</p>
2018-231 Room Restoration Project for Rooms 317, 319 and 321, Bldg 758	DPW18-081	Main Post	BE I.A2	5/9/2018	<p>After extensive mold abatement, Rooms 317, 319, and 321 and associated common areas will need to be rebuilt. The carpet, base and crown molding, trim packages, and closets will need to be replaced.</p>
2018-233 Roof Replacement, Bldgs 750, 1510, 3867, 3897, & 10015	DPW17-031	Main Post; Turkey Creek Complex	BE I.A2	5/10/2018	<p>2018-233 is an updated NEPA reviews for Bldgs 750, 1510, 3867, 3897, & 10015 (DPW17-031), as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-065 (Roof Replacement, Multiple Bldgs).</p> <p>Section 106 consultation was completed in March 2017 for the proposed repairs to the roof of Bldg 10015 (Dude String Barn) within the Turkey Creek Ranch Historic District (see also NEPA project number 2018-182).</p>

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2018-235, 2018-302, 2018-324, & 2018-366 Fire Department Training	DIR18-009	Main Post	BE I.A3	5/14/2018 7/16/2018 8/3/2018 8/23/2018	<p>The Fort Carson Fire Department proposes to conduct firefighting training in a building that is slated for demolition. The training consists of search and rescue, hose management, smoke generators for smoke training, and cutting 4-foot by 4-foot holes in the roof for ventilation.</p> <p>2018-235 & 2018-302 are the reviews for the use of Bldg 812 for the training, but it was decided not to use this building due to human health and safety concerns. 2019-324 is the review for the use of Bldg 5510 for the training, but it was decided not to use this building due to human health and safety concerns. 2018-366 is the review for the use of Bldgs 207 & 1950 for the training. Training only approved for Bldg 1950.</p>
2018-236 Construct Additional Parking Lot and Associated Traffic Control, Lighting, LID Features, and Pedestrian Connectivity, Bldg 9091	DPW17-003	Main Post	BE I.A1	5/15/2018	<p>2018-236 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2017-216.</p>

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2018-237 & 2018-275 Replace Water Main along Northern Boundary of Fort Carson	DPW17-112	Main Post Off Post	BE I.A1 BE I.A2	5/14/2018 6/22/2018	<p>2018-237 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated; 2018-275 is the final Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2017-374.</p> <p>Section 106 consultation was completed in October 2017 for the off-post segment of the undertaking (see Table 2).</p>
2018-238 Replace Water Main along Barkeley Ave between Hogan St and Titus Blvd	DPW17-126	Main Post	BE I.A1 BE I.A2	5/14/2018	<p>Replace approximately 4,200 linear feet of 12-inch water main with a new 12-inch PVC water main, which runs parallel with Barkley Ave. Project includes: connecting all existing service piping and branch piping to the new water main, cap and abandon in place the existing water main after the new main has been installed and activated, install new water main valves, building service valves, post indicator valves, and fire hydrants. A new pressure reducing valve and vault shall also be part of this project.</p> <p>2018-238 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2017-376.</p>

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2018-241 & 2018-323 Roof Replacement, Bldgs 1011, 1012, 1350, & 1370	DPW17-027	Main Post	BE I.A2	5/15/2018 8/14/2018	Both 2018-241 and 2018-323 are updated NEPA reviews for Bldgs 1011, 1012, 1350, & 1370 (DPW17-027), as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-065 (Roof Replacement, Multiple Bldgs).
2018-242 Roof Replacement, Bldgs 1217 & 1532	DPW17-028	Main Post	BE I.A2	5/15/2018	2018-242 is an updated NEPA review for Bldgs 1217 & 1532 (DPW17-028), as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-065 (Roof Replacement, Multiple Bldgs).
2018-243 Install Non-Secure Internet Protocol Router (NIPR), Secure Internet Protocol Router (SIPR), and Electricity, and Create Offices, Bldg 9090	TEN17-015	Main Post	BE I.A2	5/16/2018	2018-243 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-279.

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2018-244 Install Electrical and Communications Systems in Rms 106, 107, 116, & 117, Bldg 1456	GAR18-014	Main Post	BE I.A2	5/17/2018	In Rms 106 & 107, install wireless fidelity (Wi-Fi), install power and data for one network printer and copier, install power poles and power strips, install sound system and speakers, relocate emergency lighting, raise project screens to the ceiling line, install power and data for two 65-inch monitors, and install two 60-inch monitors. In Rms 116 & 117, install Wi-Fi, relocated emergency lighting, raise projector screen to the ceiling line, install power and data for two 65-inch monitors, and install two 60-inch monitors.
2018-245 Improvements to Outdoor Museum Exhibits at Gate 1	4ID18-002	Main Post	BE I.A1 BE I.B1	5/18/2018	Construct Memorial and Heritage Trails in order to provide outdoor educational/historical exhibits of Fort Carson and 4th Infantry Division (4ID) history.
2018-250 Construct Obstacles for Pack Horse Stakes Training, TA Bravo	1BD18-012	Main Post	BE I.A1	5/22/2018	The obstacles will be constructed no deeper than 4 feet and no wider than 6 feet.
2018-251 Replace Existing Sewer Treatment Plant Components/Systems at/around Bldg 3900	DPW16-049	Main Post	BE I.A2	5/23/2018	2018-251 is the 100% design review. Undertaking has been previously reviewed under NEPA project number 2017-367.

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2018-252 Replace Fire Alarm Panels Post-Wide	DPW17-045	Main Post	BE I.A2	5/23/2018	2018-252 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-177.
2018-253 Roof Replacement, Bldgs 1011, 1370, & 1519	DPW17-033	Main Post	BE I.A2	5/22/2018	2018-242 is an updated NEPA review for Bldgs 1011, 1370, & 1519 (DPW17-033), as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-065 (Roof Replacement, Multiple Bldgs).
2018-254 Renovate Bldg 2082	SPC17-005	Main Post	BE I.A2	5/24/2018	2018-254 is the review of Phase II of the project. This phase includes installing and relocating lighting and extending the storage area in the caged area. Undertaking has been previously reviewed under NEPA project number 2017-390.
2018-257 Ditch Maintenance on West Side of Barkeley Ave at Christie St	SO 915568	Main Post	BE I.B2	5/25/2018	The work consists of cleaning out the storm drain and adding rip rap around the outlet into I ditch on west side of Barkley Ave at Christie St.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-258, 2018-259, 2018-260, 2018-268, 2018-269, 2018-270, 2018-273, 2018-286, & 2018-318 Modifications to Facilities for Occupation by Security Force Assistance Brigade (SFAB), Bldgs 1013, 1048, 1049, 1161, 1352, 1853, & 2492	DPW18-084 DPW18-085 DPW18-086 DPW18-087 DPW18-088 DPW18-089 DPW18-090 DPW18-091 DPW18-122	Main Post	BE I.A2	5/29/2018 6/6/2018 6/7/2018 6/21/2018 8/1/2018	Upgrade interior finishes, install furniture, and install additional voice/data drops and electrical outlets. 2018-258 is review of proposed renovations to Bldg 1048. 2018-259 is the review of proposed renovations to Bldg 1352. 2018-260 is the review for the installation of new furniture in Bldgs 1013, 1048, 1049, 1352, 1853, & 2492. 2018-268 is the review of proposed renovations to Bldg 1013. 2018-269 is the review of the proposed renovations to Bldg 1049. 2018-270 is the review of the proposed renovations to Bldg 2492. 2018-273 is a review of the installation of information technology / communication systems in Bldgs 1013, 1048, 1049, 1352, 1853, & 2492. 2018-286 is the review of the proposed renovations to Bldg 1853. 2018-318 is the review of the proposed renovations to Bldg 1161.
2018-261 Repair Tactical Equipment Maintenance Facility (TEMF) Hardstand, Bldg 3092	DPW16-059	Main Post	BE I.A2	5/29/2018	Hardstand is damaged from normal life cycle degradation. Repairs will include testing and handling of any contaminated soil that is encountered.
2018-262 Install Temporary Fence for Firework Display, Iron Horse Park	MWR18-023	Main Post	BE I.A1 BE I.A3 BE I.B1	6/1/2018	
2018-266 Repair Tactical Equipment Maintenance Facility (TEMF) Hardstand, Bldg 2792	DPW18-001	Main Post	BE I.A2	6/5/2018	Hardstand is damaged from normal life cycle degradation. Repairs will include testing and handling of any contaminated soil that is encountered.

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2018-267 Raise Power Lines over Tank Trail near O'Connell Blvd	DPW18-076	Main Post	BE I.A1 BE I.A2	6/6/2018	Raise power lines over tank trail near O'Connell Blvd to prevent accidental damage to lines. They have been hit in the past, causing disruption in power to the Minick Sub Station. Two 50-foot Class 2 poles will be installed to provide higher clearance.
2018-271 Repair Multiple Stryker Brigade Facilities, Bldgs 2070, 2071, 2072, 2073, 2074, 2150, 2152, 2153, 2154, 2250, 2251, 2252, 2253, 2254, 2450, 2451, 2452, 2453 & 2454	DPW18-021	Main Post	BE I.A2	6/6/2018	Repair and paint exterior stairs. Replace two each rusted hand rail sections. Repair/grout spalled concrete landings, structures, scuppers, and soffits. Prep and paint concrete fascia and steel landing railings. Sample for and abatement of asbestos.
2018-272 Install Drinking Water/Bottle Fill Fountain in Bldgs 1200 and 1210, Fort Carson	TEN18-031	Main Post	BE I.A2	6/7/2018	Replace one drinking fountain in Bldgs 1200 and 1210 with a drinking fountain/bottle fill station fountain combo.
2018-276 Install Concrete Walk and Sign, Bldg 1843	MED17-012	Main Post	BE I.A1 BE I.A2	6/12/2018	
2018-277 4th Infantry Division (4ID) Training , Bldg. 7303 (Project Cancelled)	4ID18-009	Main Post	BE I.A3	6/12/2018	The 4th Infantry Division (4ID) proposes to conduct training in a building that has been slated for demolition. The training consists of use of the long hallways and stairwells for walk-through clearing procedures. Project was cancelled.

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2018-278 Commanding General's 4th on the 2nd Celebration	4ID18-010	Main Post	BE I.B1	6/13/2018	Project is to place large tents temporarily at 60 St. Lo Circle. Tents are to be staked down. Also need utilities below ground located in back yard and around sides of yard, to include outside of fence extending 100 feet in all directions from structure/outer fence
2018-279 Range 43 Repairs	SFG18-014	Main Post	BE I.A2	6/14/2018	Range 43 requires removing 1 to 2 feet of depth on front berm to allow snipers to engage 100-meter targets without hitting front berm. Remove all other berms within the range fans, making Range 43 completely flat.
2018-284 Install Xeriscaping in Front of Building 2765	MWR18-024	Main Post	BE I.B3	6/20/2018	
2018-285 Replace Asphalt Driveway, Bldg 5506	CIV18-007	Main Post	BE I.A2	6/21/2018	Remove via roto milling and replace approximately 200 feet of asphalt driveway from Harr Avenue west towards school. Repair / replace damaged concrete curb sections.
2018-287 Extend Water Lines to Rm 129 & Install a Washer, Dryer, & Ice Machine Hookup, Bldg 7464	SFG17-016 UPD	Main Post	BE I.A2	6/21/2018	2018-287 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2017-380.
2018-288 Paint Dog Kennels in Bldg 7472	SFG18-016	Main Post	BE I.A2	6/21/2018	

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2018-289 Modifications for Intensive Outpatient Program, Bldg 1056	MED18-014	Main Post	BE I.A2	6/25/2018	Install two corridor doors for security reasons to include card readers. Remove two walls and add a wall to configure three rooms into equally sized group rooms. Install a window in each room.
2018-292 Construction of a Special Operations Forces (SOF) Mountaineering Facility	PN 81899	Main Post	BE I.A1	6/26/2018	2018-292 is the review of the draft Request for Proposal. Undertaking has been previously reviewed under NEPA project numbers 2014-504 & 2015-217.
2018-293 Prairie Dog Extermination, Butts Army Airfield (BAAF)	BAA18-011	Main Post	BE I.B3	6/26/2018	The USDA Animal and Plant Health Inspection Services (APHIS) Wildlife Services and DPW have coordinated to have licensed personnel reduce the prairie dog population by means of rodenticides.
2018-294 Upgrades to Garrison Emergency Operations Center, Rm 117, Bldg 1118	DPT18-022	Main Post	BE I.A2	6/28/2018	Upgrades include installing three visual display units; installing five individual 75-inch flat screen televisions; installing and connecting three digital media controller switches; installing two dry-erase whiteboards (one 4 ft x 8 ft; one 3.5 ft x 6 ft); painting areas with whiteboard paint to include installing a border around and tray at bottom of area; and installing any electrical outlets, etc. necessary to accommodate upgrades.
2018-295 Construct Staging Area for "Rough Rider" Field Training Event near Bldgs 840 & 842	4SB18-005	Main Post	BE I.A1	7/11/2018	Project consists of erecting tents, and driving ground rods for generators and communication systems.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-296 Construction of Operations Training Facility, TA Bravo	4ID18-012	Main Post	BE I.A1	7/11/2018	Construction involves digging 400 meters of anti-tank ditches (5-6 feet deep), less than 15 hull defilade positions for M1 Abrams (18 feet by 32 feet by 5.5 feet), and less than 25 individual fighting positions (less than 5 feet deep). A grader will be used for combat trails.
2018-298 Roof Replacement, Bldgs 1040, 1048, 1049, 1129, 1140, 1202, 1218, 1220, 1435, 1446, 1517, 1518, 1519, 1524, 1525, 1532, 1650, 1860, 1882, 1957, 1958, 1982, 2057, 2058, 2077, 2078, 2082, 6110, 6222, 6236, 6237, 7440, 8030, 8100, 8152, & 8200	DPW18-094 - 099	Main Post	BE I.A2	7/11/2018	
2018-300 Construction and Operation of a Special Operation Forces (SOF) Human Performance Training Center	PN 79447 SFG15-017	Main Post	BE I.A1 BE I.A2 BE I.A3	7/16/2018	2018-300 is a review of the draft Request for Proposal. Portions of the undertaking has been previously reviewed under NEPA project numbers 2015-325, 2015-417, 2016-279, & 2016-443.
2018-301 Parking Lot / Access Road Repairs, Bldgs 8000, 8009 and 8012	TEN17-048	Main Post	BE I.A2 BE I.B2	7/16/2018	Bldg. 8000: regrade access road entering storage lot, apply road base, and install culvert in ditch line. Bldg 8009: regrade entire parking lot and install +/- 400 tons of road base. Bldg 8012: regrade parking lot and install +/- 800 tons of road base. Also regrade north ditch and install rip rap.
2018-303 Install Sign Poles at Bldg 7505	MED18-015	Main Post	BE I.A1	7/19/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-305 Install Closed Circuit Television (CCTV) System in Bldg 8030	1BD18-018	Main Post	BE I.A2	7/24/2018	
2018-313 Repair and Maintenance of Bldgs 813, 2059, 7490, 7500, 7503, and 7505	MED18-016	Main Post	BE I.A2	7/30/2018	Work includes updating the directories, installation of rooftop safety equipment, replacement of flooring and upgrading changing rooms and window coverings. Also, replace floor radiant heat with ceiling system. Remove Tank 101 and 102, including all piping and containment protection. Install refrigerated cooling in Rm 1723, Bldg 7500. Add glycol cooling and heating to Bldg 813, and replace VDF in Bldg 7503. Replace failed drain on Bldg 7500, which will require the removal and replacement of concrete above Rm 0505.
2018-315 Repair Fire Line Break at Bldg 6200 (Carson Middle School)	CIV18-009	Main Post	BE I.A2	7/31/2018	
2018-316 Install Electrical Circuits in Bldg 1550	DIR18-012	Main Post	BE I.A2	8/1/2018	
2018-317 Replace Carpet with Tile in Bldg 7503	MED18-017	Main Post	BE I.A2	8/1/2018	
2018-319 Install New 2-inch Conduit and Coaxial in the Housing Area on Kimbro St	MWR18-025	Main Post	BE I.A1	8/1/2018	
2018-325 Replace/Install Vertical Lift Modules in Bldg 330	CIV18-010	Main Post	BE I.A2	8/10/2018	
2018-326 Sewer Line Repair in Infantry Creek	935751	Main Post	BE I.A2 BE I.B2	8/13/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-329 Replace Existing Gas Lines at Bldgs 8110 and 8472	DPW18-123	Main Post	BE I.A1 BE I.A2	8/14/2018	
2018-333 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Bird Farm Recreation Area Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/3/2018	<p>2018-333 is the initial review for the FY19 project; but several of the proposed locations were reviewed as part of the FY18 Prescribed Fire and Wildland Fuels Reduction Plan (NEPA project numbers 2018-001, 2018-004, 2018-119, & 2018-205)</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in February 2018 for portion of the project within the Turkey Creek Complex (see Enclosure 1, Table 2).</p> <p>Section 106 consultation is required for the portion of the project within Bird Farm Recreation Area.</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</p>
2018-334 Construct Public/Private Venture (PPV) Solar Array South of Butts Army Airfield (BAAF)	DPW16-027	Main Post	BE I.A1	8/15/2018	<p>2018-334 is an updated Environmental Condition of Property document to review.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2016-162, 2016-220, & 2016-485.</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
2018-335 Install Exit Door Signs, Bldg 6215	MWR18-005	Main Post	BE I.A2	8/21/2018	Install six exit signs above six interior doors in the building. Signs require hard wiring and have back up batteries.
2018-337 Install Water Fountain, Bldg 7412	SFG18-021	Main Post	BE I.A2	8/28/2018	Install one drinking water fountain on the 2nd floor, north side of the building.
2018-341 Use of Fill Dirt from Cheyenne Mountain Air Force Station for Trap/Skeet Facility Maintenance Activities at Cheyenne Mountain Shooting Complex (Project On Hold Pending Material Testing)	MWR18-028	Main Post	BE I.A2	9/4/2018	
2018-342 Upgrade Ballistics Level Protection of Guard Booths, Gates 6 & 19	DIR16-007	Main Post	BE I.A1 BE I.A2	9/4/2018	<p>Replace two guard kiosks in lanes 2 and 3 at Gate 6 and two guard kiosks in lanes 2 and 3 at Gate 19 with level 3 ballistic-rated guard kiosks. Replace standard window glass in gate house at Gates 6 and 19 with level 3 rated ballistic glass.</p> <p>2018-342 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-225.</p>
2018-343 Refurbish Bldg 2700 (Military Police Station)	DIR14-023	Main Post	BE I.A2	9/5/2018	Remove burlap from walls in Desk Rm. 144 and repaint walls with an egg shell color. Remove Mass Notification System controls from south wall and relocate controls in ceiling. Provide new acoustical ceiling tiles and paint existing ceiling grid throughout building. In Desk Rm 144, extend raised floor area,

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
					<p>provide new cabinetry - desks (with drawers and file cabinets), cabinets and wall shelving, and mount existing gun safes to wall. Add mirror glass/tint and install glass with drawer at the customer window at Desk Rm 144. Provide new LED lighting throughout building. In Desk Rm 144, provide directional wall lighting with multiple control options, and electrical and communications as needed. Re-balance HVAC system and provide new diffusers throughout building. Replace vinyl composition flooring in the AWOL Rm 133 and below the door swing from Rm 133 into Rm 135. Replace rubber base trim in Rm 133 and metal threshold below the exterior door at Rm 133. Prep and paint interior of the building. Replace all existing broadloom carpet with new carpet tile throughout the building. Review existing fire sprinkler system, and modify and upgrade as needed to meet code. Soundproof Interview Room (Rm 123).</p> <p>2018-343 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2014-248 & 2015-110.</p>
2018-350 Install CenturyLink Fiber to Bldg 9121	TEN18-045	Main Post	BE I.A1	9/12/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-351 Renovate Bldg 7440	SFG17-014	Main Post	BE I.A2	9/25/2018	<p>Install an interior floor drain spanning the western addition, a washer and dryer hookup, six industrial wash sinks, and relocate an existing compressed air line. Adjust existing walls to create an isolated oxygen storage room. All of these utilities are to be installed on the interior wall of the eastern side of the west addition.</p> <p>2018-351 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-379.</p>
2018-353 Install Obstacle Course Near Bldg 7506	MED18-020	Main Post	BE I.A1	9/17/2018	
CF2018-009 Construction of a Forward Operating Base, TA 8	n/a	Main Post	BE I.A1	2/1/2018	
CF2018-024 Improvised Explosive Device (IED) Route Clearance Training, Range 60A	n/a	Main Post	BE I.C3	3/28/2018	Simulated IED training required digging to bury training devices on existing range.

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
2018-001, 2018-004, 2018-119, & 2018-205 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	10/10/2017 10/25/2017 2/8/2018 4/16/2018	HC #73678 2/28/2018 (Turkey Creek Complex APE)	<p>No historic properties affected</p> <p>2018-001 is the initial review for the project. 2018-004 and 2018-119 are reviews of proposed scope changes; and 2018-205 is an updated NEPA review, as it has been over six months since last reviewed and portions of the project had not been initiated.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</p> <p>Section 106 consultation covers only the portion of the undertaking within the Turkey Creek Complex.</p>
2018-054 Relocate Generator from Bldg 1430 on Fort Carson to Bldg 7330 at the Arrival/Departure Air Control Group (A/DACG) Rapid Deployment Facility near the Colorado Springs Airport	DPT18-003	Main Post A/DACG Rapid Deployment Facility	12/19/2017	HC #73442 1/17/2018	<p>No historic properties affected</p> <p>Section 106 consultation covers only the portion of the undertaking occurring at the A/DACG Rapid Deployment Facility.</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
2018-157 & 2018-328 Repair Dam at Haymes Reservoir	DPW16-015 DPW17-039 SO 771662	Haymes Reservoir	3/7/2018 8/10/2018	HC #70172 2/1/2017	No historic properties affected Both 2018-157 & 2018-328 are updated NEPA reviews of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project numbers 2016-201, 2016-463, & 2017-272.
2018-182 Repair Roof and Paint Exterior of Bldg 10015 (Dude String Barn), Turkey Creek Ranch Historic District	4ID17-010	Turkey Creek Complex	3/29/2018	CHS #71946 3/14/2017	No adverse effects to historic properties
2018-187 Install Cliff Swallow Nesting Structures at Haymes Reservoir	DPW18-068	Haymes Reservoir	4/3/2018	HC #74110 4/30/2018	No adverse effects to historic properties
2018-237 & 2018-275 Replace Water Main along Northern Boundary of Fort Carson	DPW17-112	Main Post Off Post	5/14/2018 6/22/2018	HC #72975 10/30/2017	No historic properties affected 2018-237 is an updated NEPA review, as it has been over six months since last reviewed and project had not been initiated; 2018-275 is the final Biddability, Constructability, Operability, Environmental, and Sustainability (BCOES) review packet. Undertaking has been previously reviewed under NEPA project numbers 2017-374.
2018-312 Repair and Maintenance of Bldg 10002 (Log Cabin), Turkey Creek Ranch Historic District	Inspection 927607	Turkey Creek Complex	7/30/2018	HC #74795 8/27/2018	No adverse effects to historic properties

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2018-333 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	2018-333 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	10/3/2018	— (Bird Farm Recreation Area APE) HC #73678 2/28/2018 (Turkey Creek Complex APE)	<p>2018-333 is the initial review for the FY19 project; but several of the proposed locations were reviewed as part of the FY18 Prescribed Fire and Wildland Fuels Reduction Plan (NEPA project numbers 2018-001, 2018-004, 2018-119, & 2018-205)</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in February 2018 for portion of the project within the Turkey Creek Complex (see Enclosure 1, Table 2 of the Fort Carson Built Environment PA).</p> <p>Section 106 consultation is required for the portion of the project within Bird Farm Recreation Area.</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</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
2018-020 Release of Bldg 8110 & 8111 from Colorado Army National Guard (COARNG) back to USAG Fort Carson	n/a	Main Post	9/29/2017	The Colorado Army National Guard (COARNG) no longer has a need to utilize the 11.7 acre property with Bldgs 8110 & 8111, which are owned by the USAG Fort Carson. An environmental clearance must be completed prior to the returning the buildings. No potential to effect historic properties
2018-027 Permit Renewal to Defense Printing Service (Navy) for Use of Bldg 1550	n/a	Main Post	11/8/2017	Renew the existing permit to Defense Printing Service (Navy) for the space within Bldg 1550 for printing services. No potential to effect historic properties
2018-035 FY18 Communications-Electronics Command (CECOM) Stationing at Fort Carson, CO	n/a	Main Post	11/21/2017	This stationing action results in an increase of four civilians at Fort Carson. No potential to effect historic properties
2018-039 Fort Carson Stormwater Management Plan Review	n/a	n/a	11/28/2017	Document Review

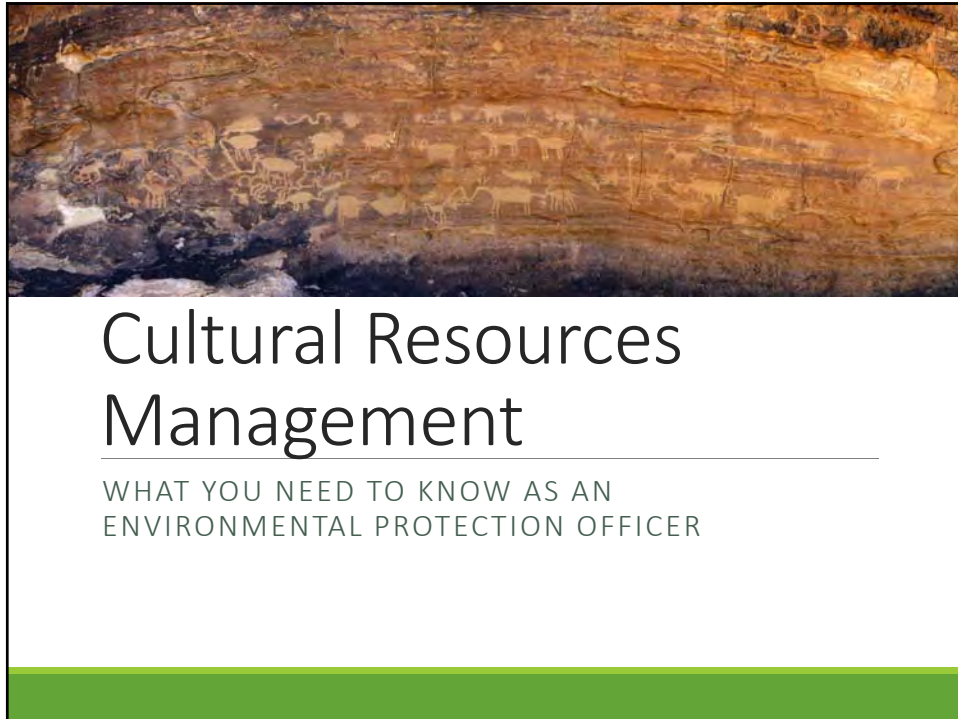
USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2018-047 Assessment of Fire Suppression Systems Post-Wide	DPW18-047	Main Post	12/6/2017	<p>A post-wide survey of all buildings is required to determine which fire suppression systems require an upgrade to bring the facility within current Unified Facilities Code (UFC) and National Fire Protection Association (NFPA) code compliance. Afterward, a scope of work will be developed for architectural and engineering designs, followed by the construction project.</p> <p>The survey itself has no potential to effect historic properties. Once a scope of work has been developed, then the undertaking will be reviewed again.</p>
2018-129 25-Year Easement Renewal to CenturyLink, Fort Carson	n/a	Fort Carson-wide	2/14/2018	<p>Renew the existing easement for a period of 25 years with CenturyLink (formerly US West Communications) for the continued operation of a telecommunication fiber optic cable. This easement extends from the northern boundary of Fort Carson near Gate 4 (B St entrance) to the southern boundary near Stone City Rd.</p> <p>No potential to effect historic properties</p>
2018-130 5-year Lease Renewal to USO, Fort Carson	n/a	Main Post	2/15/2018	<p>Renew an existing lease for a period of five years to the United Service Organizations (USO) for space within Bldg 1218 for continued operations.</p> <p>No potential to effect historic properties</p>
2018-154 Mountainside Elementary School Lease Renewal	n/a	Main Post	3/1/2018	<p>Renew an existing lease for a period of 25 years to El Paso County School District No. 8 for the continued operation of Mountainside Elementary.</p> <p>No potential to effect historic properties</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2018-158 Renew Easement to CenturyLink on Fort Carson	n/a	Main Post	3/8/2018	<p>Renew an existing easement for 25 years to CenturyLink for a communication right-of-way. The right-of-way enters the west boundary of Fort Carson along the north side of O'Connell Blvd, then south on Wetzel Ave, and ends at Prussmen Blvd.</p> <p>No potential to effect historic properties</p>
2018-199 Stationing Action: Activation of 115th Quartermaster Company and 42nd Medical Detachment, and Inactivation of 40th Quartermaster Petroleum Team	n/a	Main Post		<p>This stationing action will result in a net increase of 155 military personnel.</p> <p>No potential to effect historic properties</p>
2018-203 Renew Permit for Defense Logistics Agency (DLA) Disposition Services	n/a	Main Post	4/10/2018	<p>Renew an existing permit to the Defense Logistics Agency (DLA) for the occupation and utilization buildings and lands for its mission to dispose of used and excess military property.</p> <p>No potential to effect historic properties</p>
2018-247 Stationing Action: Realignment of United States Army Health Activity's (USAHCA) Regional Health Contracting Offices (RHCO) and Health Readiness Contracting Offices (HRCO)	n/a	Main Post	5/22/2018	<p>This stationing action results in a decrease in four civilian authorizations at Fort Carson.</p> <p>No potential to effect historic properties.</p>
2018-255 Annual Review of the Integrated Cultural Resources Management Plan (ICRMP)	n/a	n/a	5/21/2018	Document Review
2018-256 Renew Lease DACA45-1-09-6010 / Crown BU #877058	n/a	Main Post	5/1/2018	<p>Renew the existing lease for a period of five years for the continued operation of the 100-foot telecommunication tower on Signal Hill.</p> <p>No potential to effect historic properties</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2018-304 U.S. Army Corps of Engineers (USACE) Butts Army Airfield (BAAF) Stormwater Study	DPW18-120	Main Post	7/23/2018	The U.S. Army Corps of Engineers (USACE) will perform stormwater study in and around Butts Army Airfield (BAAF) (Bldgs. 9660, 9620, 9686, 9690) including east and west ravine leading into North Side Reservoir. This study utilizes only existing data. No potential to effect historic properties.
2018-340 Review of the 2018 Environmental Battle Book	n/a	n/a	8/29/2018	Document Review
2018-347 City of Fountain Water Treatment Plant Lease Renewal	n/a	Main Post	8/27/2018	Renew the existing lease for a period of 25 years to the City of Fountain for the continued operation of its sand filtration water treatment system located east of Butts Army Airfield (BAAF). No potential to effect historic properties

ENCLOSURE 2:
ENVIRONMENTAL PROTECTION OFFICER (EPO) COURSE

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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

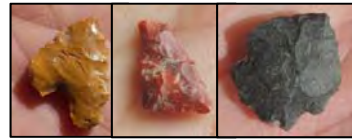
What are Cultural Resources?

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

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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

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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.**

8/23/2017

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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

8/23/2017

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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

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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

8/23/2017

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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

8/23/2017

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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



8/23/2017

FORT CARSON EPO COURSE

14

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?

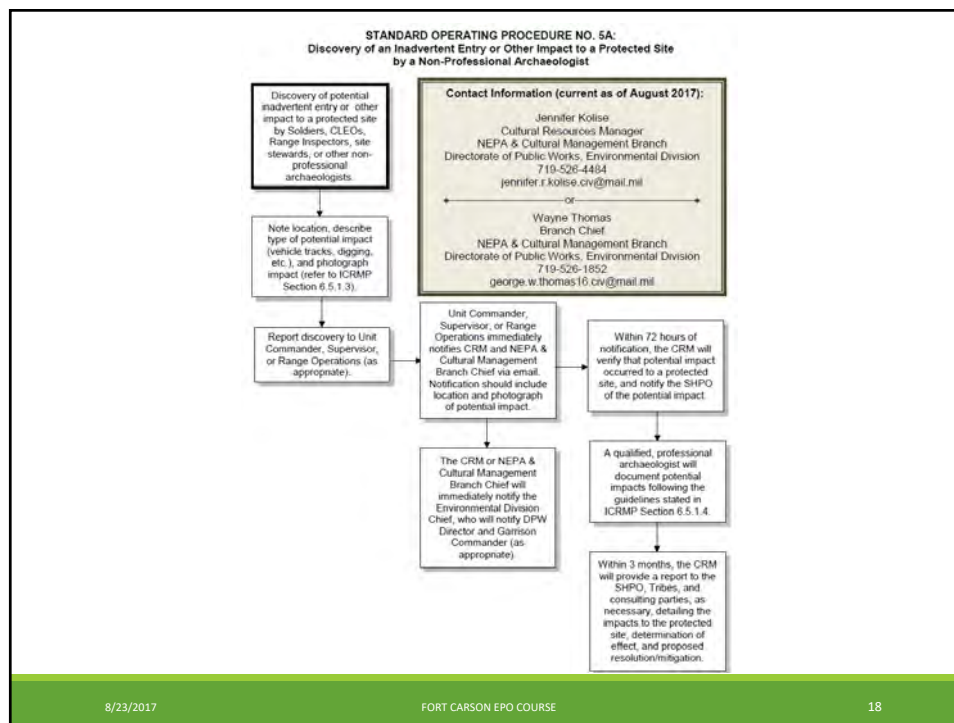
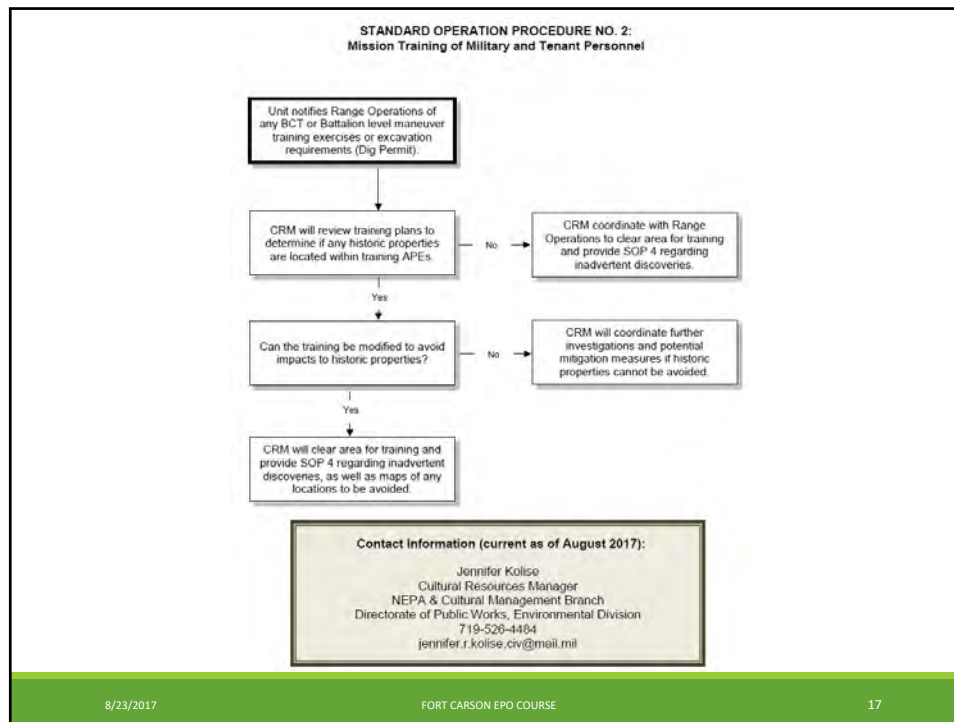
DO:

- 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

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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.

8/23/2017

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19

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

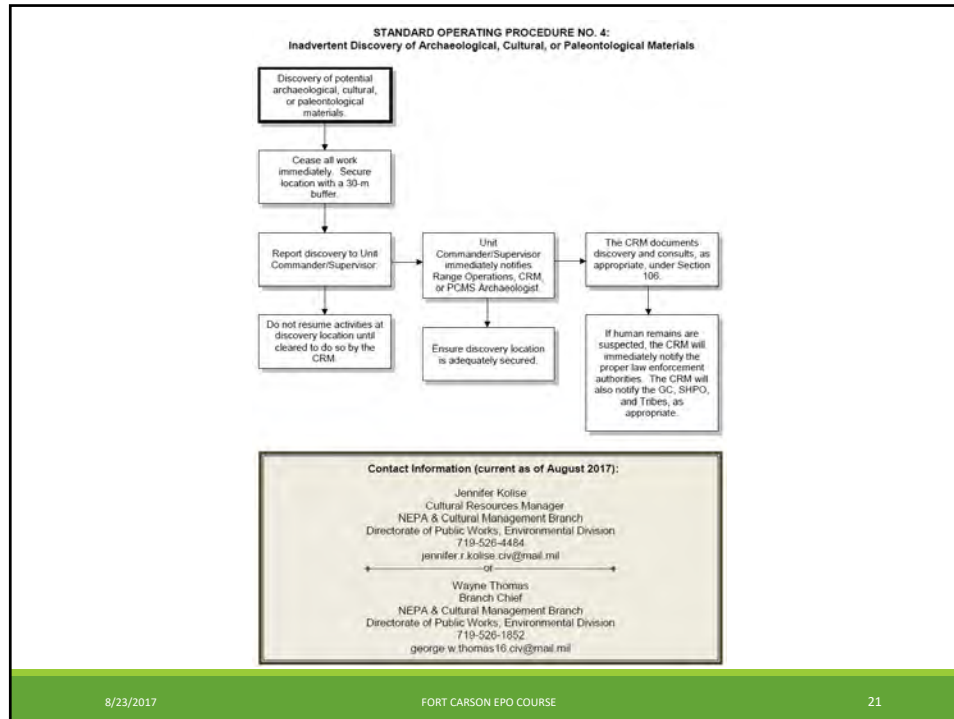
STOP WORK IMMEDIATELY

- 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.

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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

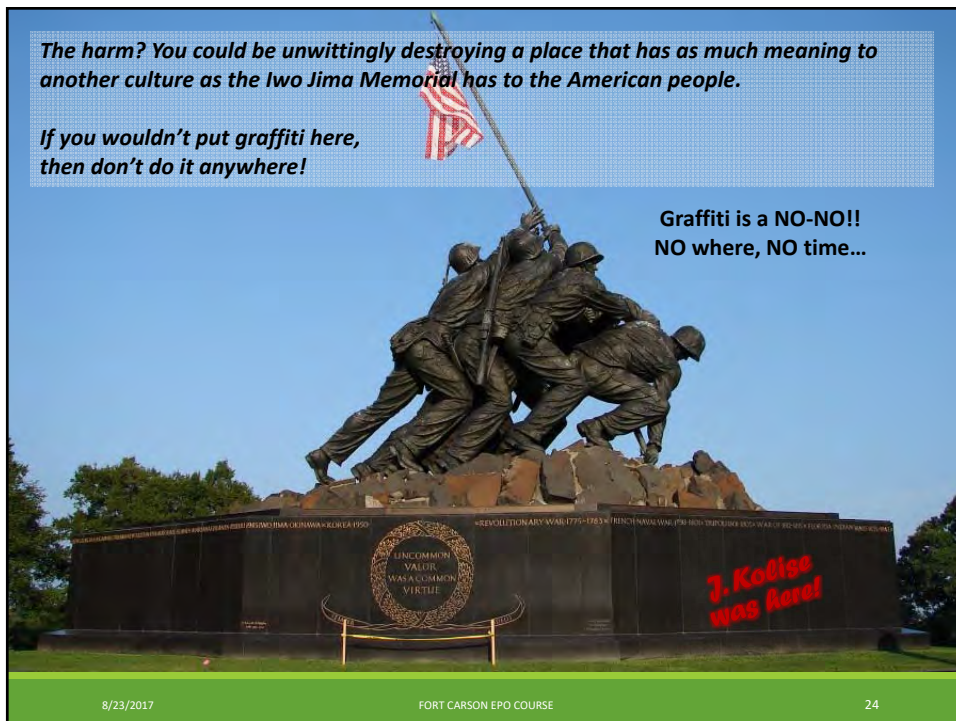
FORT CARSON EPO COURSE

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...**

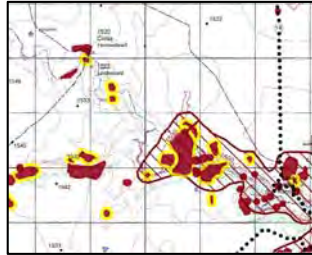


8/23/2017

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24

Site Protection Measures



Protected Resources JCR Map

Red = unmarked restricted area
Red with yellow outline = marked restricted area
Red hash-marked area = dismounted 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

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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?
 - www.carson.army.mil/DPW/nepa.html

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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

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27

Question 1

True or False:

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

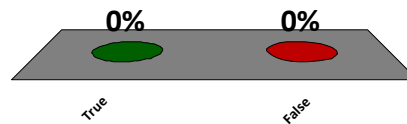
8/23/2017

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28

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

- A. True
- B. False



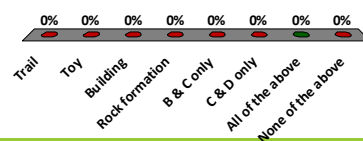
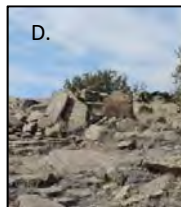
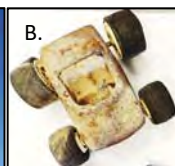
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29

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



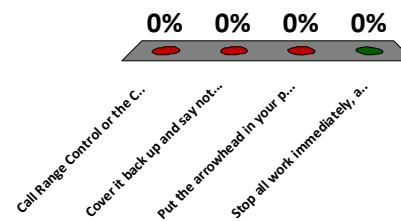
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FORT CARSON EPO COURSE

30

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

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31

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

32

FISCAL YEAR (FY) 2018 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, 2018

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, 2017, through September 30, 2019, and includes information as outlined in Stipulation V.A. It has been distributed electronically to the SHPO and concurring parties and is available online at: <http://www.carson.army.mil/organizations/dpw.html#three>.

I. Exempted Undertakings

Table 1 of Enclosure 1 lists all exempted undertakings that have been reviewed by the Fort Carson Cultural Resources Management Program (CRMP) between October 1, 2017, and September 30, 2018. Seventy-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). Thirteen undertakings required Section 106 consultation.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRMP. These five undertakings include document reviews, undertakings with no potential to effect historic properties, and one project for which more information is needed before the Cultural Resources Manager can determine if Section 106 consultation will be required.

III. Action Updates

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

The Fort Carson Downrange PA Task Tracker (Enclosure 2) provides detailed information regarding the status of the various tasks implemented under Stipulation I, Inventory and Evaluation of Cultural Resources; Stipulation III, Protection of Historic Properties; Stipulation IV, Monitoring; and Stipulation VI, Mitigation.

B. Cultural Resources Awareness Training

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

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated August 2017 (Enclosure 3)
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; available online at: <http://www.carson.army.mil/organizations/dpw.html> (click on the link titled “DPW Programs and Services” on the left side of the page, then scroll up half a screen)
- Cultural Resources Awareness Video – available online at: <http://www.carson.army.mil/organizations/dpw.html#three>

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

No comments on the cultural awareness training materials were received from the SHPO or concurring parties from the FY2017 Annual Report.

C. Inadvertent Entries and/or Impacts to Historic Properties

During a site monitoring visit on March 13, 2018, Whitetail archaeologists (Contractor) noted 5PE2966 had been entered by multiple vehicles. The Contractor informed the Cultural Resources Manager (CRM) on March 13, 2018. The SHPO was notified via email on March 14, 2018. At least four wheeled vehicles traversed the site, resulting in only matted vegetation and light impressions (less than 2 cm in depth). No cultural features were observed in the tracks. A Memorandum for Record and supporting documentation was submitted to the SHPO on June 21, 2018. Via correspondence dated July 2, 2018 (HC #63877), the SHPO concurred with the USAG Fort Carson’s finding of “no adverse effect” to historic properties.

During a routine inspection on March 13, 2018, a Fort Carson Conservation Law Enforcement Officer identified a potential vehicle entry into site 5EP5974. The Officer informed the CRM on March 14, 2018. Whitetail archaeologists confirmed and documented this entry on March 14, 2018. The SHPO was notified via email on March 15, 2018. A passenger-sized light truck (non-tactical vehicle) crossed the northern portion of the site, resulting in only matted vegetation. The vehicle did drive over the very northern portion of Feature 1, a spaced stone circle, but no stones were displaced. A Memorandum for Record and supporting documentation was submitted to the SHPO on June 21, 2018. Via correspondence dated July 2, 2018 (HC #63877), the SHPO concurred with the USAG Fort Carson’s finding of “no adverse effect” to historic properties.

On May 11, 2018, a Fort Carson Conservation Law Enforcement Officer observed six portable latrines within the boundary of a protected resource. The Officer informed the

CRM on May 11, 2018. The SHPO was informed via email on May 14, 2018. Multiple sets of tracks, belonging to both wide-based and narrow-based wheeled vehicles entered the protection boundary of the site. These entries resulted in matted vegetation to slight rutting (less than 5 cm in depth). One light passenger truck entered the site boundary, resulting in matted vegetation to light impressions (less than 2 cm in depth). Only matted vegetation is noted in the area in which the portable latrines had been placed, which is outside the site boundary, but within the protection boundary. No cultural features were observed in the tracks or the portable latrine area. A Memorandum for Record and supporting documentation was submitted to the SHPO on June 21, 2018. Via correspondence dated July 2, 2018 (HC #63877), the SHPO concurred with the USAG Fort Carson's finding of "no adverse effect" to historic properties.

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.

- Range 111: The wildland fire started October 20, 2017, with fire suppression activities concluding on the same day. Approximately 609 acres within the Large Artillery Impact Area near Range 111 were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.

- Range 155: The wildland fire started October 29, 2017, with fire suppression activities concluding on the same day. Approximately 100 acres within the Large Artillery Impact Area near Range 155 were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.

- 7790 Route 1: The wildland fire started December 10, 2017, with fire suppression activities concluding on December 12, 2017. It was decided to eliminate the unburned fuels within the Large Artillery Impact Area due to the numerous fires that had been ignited within the area of late. Approximately 15,847 acres were impacted. The fire ignition was related to military training activities. There are two historic properties located within the Large Artillery Impact Area: 5EP2528, an open lithic; and 5EP6180, an open camp. Due to the presence of unexploded ordnance, after action investigations of these sites were not authorized.

- Range 103: The wildland fire started January 31, 2018, with fire suppression activities concluding on the same day. Approximately 250 acres between Range 103 and Range 141A within the Large Artillery Impact Area were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.

- Apache Complex Wildland Fire: The wildland fire started February 23, 2018, with fire suppression activities concluding on February 26, 2018. Approximately 2,714 acres within Training Areas (TA) 35 and 37 were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.
- Orchard Canyon Wildland Fire: The wildland fire started March 8, 2018, with fire suppression activities concluding on March 11, 2018. Approximately 1,528 acres within TA 38 were impacted. The fire ignition was related to military training activities. There are 10 historic properties within the wildland fire footprint. After action investigations were conducted by the Cultural Resources Manager and PCMS Archaeologist between May 31 and June 1, 2018. The after action report is forthcoming.
- Range 123: The wildland fire started March 14, 2018, with fire suppression activities concluding on March 15, 2018. Approximately 310 acres within Range 123 were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.
- Fort Carson-Midway Wildland Fire: The wildland fire started March 16, 2018, with fire suppression activities concluding on March 17, 2018. Approximately 3,241 acres within TA 36 and off post were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.
- Range 155: The wildland fire started April 4, 2018, with fire suppression activities concluding on April 6, 2018. Approximately 1,480 acres within Range 155 were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.
- Range 155: The wildland fire started April 19, 2018, with fire suppression activities concluding on the same day. Approximately 100 acres within the Large Artillery Impact Area near Range 155 were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.

During the reporting period, there were numerous other smaller wildfires within the Large Artillery Impact Area, Range 143, and Range 155. These fires ranged in size from 0.1 acre to 98 acres, and were caused by military training activities. No historic properties were within the fire footprint for Ranges 143 and 155. There are two historic properties located within the Large Artillery Impact Area: 5EP2528, an open lithic; and 5EP6180, an open camp. Due to the presence of unexploded ordnance, after action investigations of these sites were not authorized.

F. Amendment

The First Amendment to the Fort Carson Downrange PA was executed on May 2, 2018. This amendment 1) standardized the language between this PA and the Piñon Canyon Maneuver Site-specific PA; 2) updated Stipulation IV to better describe the site inspection and monitoring program; and 3) clarified certain stipulations.

Comments on the proposed amendments were received from the Colorado Council of Professional Archaeologists via correspondence dated November 28, 2017. Enclosure 4 includes their correspondence, as well as the USAG Fort Carson's response to those comments.

Since the amendment was executed, Appendix 2 of the PA has been updated. A version of the updated Appendix 2 with changes denoted is included in Enclosure 5.

G. Dispute Resolution

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

Report compiled by:

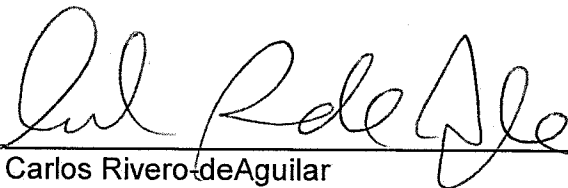
Jennifer R. Kolise
Cultural Resources Manager

Approved by:



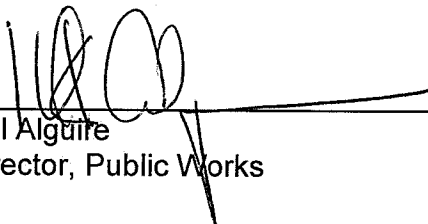
Wayne Thomas
Chief, NEPA and Cultural Management Branch

7 Nov 2018
Date



Carlos Rivero de Aguilar
Chief, Environmental Division

7 Nov 2018
Date



Hal Alguire
Director, Public Works

8 Nov 2018
Date

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ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY18 REPORTING PERIOD (OCTOBER 1, 2017, THROUGH SEPTEMBER 30, 2018) 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
2018-001, 2018-004, 2018-119, & 2018-205 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/10/2017 10/25/2017 2/8/2018 4/16/2018	<p>2018-001 is the initial review for the project. 2018-004 and 2018-119 are reviews of proposed scope changes; and 2018-205 is an updated NEPA review, as it has been over six months since last reviewed and portions of the project had not been initiated.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in February 2018 for portion of the project within the Turkey Creek Complex (see Enclosure 1, Table 2 of the FY18 Annual Report for the Fort Carson Built Environment PA).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</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
2018-005 Improvements to the Austere Unmanned Aerial Systems (UAS) Strip in Training Area (TA) 17	4ID16-019	Downrange Fort Carson	FC B FC D1a	10/10/2017	Improvements to the existing austere Unmanned Aerial Systems (UAS) strip include: one milling pad (250 feet by 100 feet), elevating TALS pad (250 feet by 40 feet), and adjusting the four retrieval pads (3 feet by 100 feet each). Construction of the austere UAS strip was reviewed under NEPA project number 2016-392.
2018-010 4th Engineers Headquarters and Headquarters Company (HHC) Field Training Exercise, TAs 16 & 20 (Project Cancelled)	n/a	Downrange Fort Carson	10/12/2017	FC A FC B FC C	
2018-013 1st Stryker Brigade Combat Team (1SBCT) "Raider Storm" Training Exercise, Fort Carson	n/a	Downrange Fort Carson	FC A FC B FC C	10/17/2017	
2018-023 FY18 Survey for and Abatement of Asbestos-Containing Materials / Lead-Based Paint at Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS-wide	BE I.A2 BE I.C2 BE I.D1i BE I.D2i BE I.D3c BE I.D4 FC D1b PC A2b PC B4a2 PC C3a1 PC D3a1	10/31/2017	Surveys for and/or abatement of asbestos-containing materials and lead-based paint must be conducted prior to carpet removal and/or installation, building renovation activities, and ground-disturbing activities.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-028, 2018-037, 2018-132, & 2018-249 Teller Dam Project	n/a	Downrange Fort Carson	FC D1b	11/8/2017 11/16/2017 2/16/2018 5/23/2018	<p>2018-028 is the review for the proposed borrow pit locations; 2018-037 is the 30% design review; 2018-132 is the 60% design review; and 2018-249 is the 100% design review.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2016-113, 2016-187, & 2017-249.</p> <p>Section 106 consultation was completed in January 2018 for the construction of the borrow pits (see Table 2).</p>
2018-029 Operate Teller Dam Gage Network	DPW18-044	Downrange Fort Carson	FC D1b	11/13/2017	No construction required. Includes installation of two seepage gages, one reservoir level gage, one spillway flow gage, one Turkey Creek flow gage, and one camera. Gage network is operated by U.S. Geological Survey (USGS).

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-049, 2018-144, 2018-310, & 2018-345 Quarterly Record of Environmental Consideration (REC) for Training	DPT18QTR2 DPT18QTR3 DPT18QTR4 DPT19QTR1	Main Post Downrange Fort Carson PCMS-wide	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/11/2017 2/2/2018 7/27/2018 9/7/2018	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.
2018-061 Conversion of the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) to an Armored Brigade Combat Team (ABCT)	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	1/2/2018	The Army is proposing to convert the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) stationed at Fort Carson into an Armored Brigade Combat Team (ABCT) or re-station and convert to an ABCT at Fort Riley, Kansas; Fort Bliss, Texas; Fort Hood, Texas; or Fort Stewart, Georgia. 2018-061 is the review of the Army's Draft Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impacts (FNSI) for this proposed action.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-081 Integrated Training Area Management (ITAM) Projects at PCMS and Fort Carson	DPT16-025	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	1/19/2018	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>2018-081 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-456.</p>
2018-082 Integrated Training Area Management (ITAM) Projects, Fort Carson	DPT16-026	Downrange Fort Carson	FC D1b FC D2a	1/19/2018	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>2018-082 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-457.</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
2018-083 Integrated Training Area Management (ITAM) Projects, Fort Carson	DPT16-027	Downrange Fort Carson	FC D1b FC D2a	1/19/2018	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>2018-083 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-458.</p>
2018-084 Integrated Training Area Management (ITAM) Projects, Fort Carson	DPT17-002	Downrange Fort Carson	FC D1b FC D2a	1/19/2018	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>2018-084 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2017-047.</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
2018-085, 2018-167, & 2018-183 FY17 Post-Wide Erosion Projects	PN 86934 DPW17-034 DPW17-035 DPW17-036 DPW17-037	Main Post Downrange Fort Carson	BE I.A2 BE I.B2 FC D1b FC D2a	1/19/2018 3/19/2018 3/22/2018	2018-085 is the 60% design review; 2018-167 is the 100% design review; and 2018-183 is the review of the Environmental Protection Plan. Project numbers DPW17-034 through 037 have been combined into one project. Undertaking has been previously reviewed under NEPA project numbers 2017-101 (DPW17-034), 2017-101 (DPW17-035), 2017-149 (DPW17-036), 2017-217 (DPW17-217), & 2017-287.
2018-087 Training Area (TA) 40 Land Rehabilitation Projects	DPT18-006	Downrange Fort Carson	FC D2a	1/22/2018	Project requires bank sloping (4:1) along the drainage and repairing Erosion Control Dam #156, which will be widened at the top and re-sloped to 4:1.
2018-100 4th Combat Aviation Brigade (CAB) "Eagle Strike" Training Exercise, Fort Carson and PCMS	n/a	Downrange Fort Carson PCMS-wide	FC A FC B FC C PC A.1 PC B.1 PC B.2 PC B.3 PC C.1 PC C.2 PC D.1 PC D.2	1/30/2018	
2018-122 Connect Power to Bldg 131C (Mobile Office)	TEN18-023	Downrange Fort Carson	FC D1a FC D1c	2/13/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-134 Repair/Upgrade Unmanned Aerial Systems (UAS) Strip at Camp Red Devil	DPW18-008	Downrange Fort Carson	FC D1b	2/21/2018	Includes soil stabilizing agent (magnesium chloride) application. Also includes importing fill to raise shoulder elevation for landing system and replacing corrugated metal pipe culverts with reinforced concrete pipe culverts to correct landing system site angle conflicts.
2018-136 Improvements to Unmanned Aerial Systems (UAS) Complex in TA 17	BAA17-005 PN 75893	Downrange Fort Carson	FC D1b	2/21/2018	<p>This project includes paving the existing runway, regrading disturbed areas to extend shoulders/overruns/launcher site, surface shoulders/maintenance area/launcher site with aggregate, install fence around maintenance area, and place grassy swales/LID features as required.</p> <p>Construction of the Unmanned Aerial Systems (UAS) Complex in TA 17 was reviewed under NEPA project numbers 2016-206, 2017-183, 2017-251, & 2017-301.</p> <p>Section 106 consultation was completed in June 2016 for the construction of the UAS complex.</p>
2018-173 FY18 Invasive Species Treatments	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	3/22/2018	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.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-174 Repairs to the Austere Unmanned Aerial Systems (UAS) Strip in TA 17	n/a	Downrange Fort Carson	FC D1b	3/22/2018	This project includes repair to 245 feet of shoulder on the east side of airstrip. Fill will be obtained on site. No compaction is required. Construction of the austere UAS strip was reviewed under NEPA project number 2016-392. Subsequent improvements to the UAS strip were reviewed under NEPA project number 2018-005.
2018-178 71st Explosive Ordnance Disposal (EOD) Training Event Using Tannerite on Range 165, Fort Carson (Project Cancelled)	n/a	Downrange Fort Carson	FC A	3/21/2018	Project was cancelled.
2018-228 Tamarisk Biocontrol Study	n/a	Downrange Fort Carson PCMS-wide	FC D2a FC D2b PC B4b1 PC B4b2 PC D3b1 PC D3b2	5/3/2018	Scientific study to assess the phenology of tamarisk and biocontrol agent, tamarisk leaf beetle, on Fort Carson and PCMS. Surveys will include specimen collection of tamarisk and tamarisk leaf beetles, as well as, time lapse photography of plants. Cameras will be mounted onto trees where available or t-post (or similar post) if necessary.
2018-265 Review of Proposed Locations for Unmanned Aerial Systems (UAS) Training	n/a	Downrange Fort Carson	FC B FC C	6/4/2018	
2018-274 Super Tanker Training Activity (Project Cancelled)	n/a	Downrange Fort Carson	FC B	6/8/2018	Project was cancelled.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-306 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 24 and 25) and PCMS (TA 7)	DPT18-024	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/25/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.
2018-307 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 20, 40, 42 and 55) and PCMS (TA 7)	DPT18-025	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/25/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.
2018-308 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 14, 21, 25 and 31) and PCMS (TAs 7 and 10)	DPT18-027	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/25/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Section 106 consultation is ongoing for portions of the project (see Table 2).

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-311 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 21, 24 and 31) and PCMS (TA 7)	DPT18-026	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/27/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Section 106 consultation is ongoing for portions of the project (see Table 2).

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-333 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Bird Farm Recreation Area Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/3/2018	<p>2018-333 is the initial review for the FY19 project; but several of the proposed locations were reviewed as part of the FY18 Prescribed Fire and Wildland Fuels Reduction Plan (NEPA project numbers 2018-001, 2018-004, 2018-119, & 2018-205)</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in February 2018 for portion of the project within the Turkey Creek Complex (see Enclosure 1, Table 2 of the Fort Carson Built Environment PA).</p> <p>Section 106 consultation is required for the portion of the project within Bird Farm Recreation Area (see Enclosure 1, Table 2 of the Fort Carson Built Environment PA).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</p>
2018-349 Install Wooden Fence around Charlie House, Range 131C	SFG18-018	Downrange Fort Carson	FC D1a	9/12/2018	
CF2018-001 4th Engineers Dig Request, TAs 16 & 20	n/a	Downrange Fort Carson	FC C	10/16/2017	
CF2018-003 60th Ordnance Company Dig Request, TA 42	n/a	Downrange Fort Carson	FC C	11/28/2017	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
CF2018-004 59th Quartermaster Company Dig Request, TA 31	n/a	Downrange Fort Carson	FC C	1/9/2018	
CF2018-005 60th Ordnance Company Dig Request, TA 31	n/a	Downrange Fort Carson	FC C	1/9/2018	
CF2018-006 59th Quartermaster Company Dig Request, TA 31	n/a	Downrange Fort Carson	FC C	1/17/2018	
CF2018-007 183rd Support Maintenance Company Dig Request, TAs 24 & 29	n/a	Downrange Fort Carson	FC C	1/22/2018	
CF2018-008 68th Combat Sustainment Support Battalion Dig Request, TA 42 and 43	n/a	Downrange Fort Carson	FC C	1/22/2018	
CF2018-010 1-68 Armor Regiment Dig Request, Range 155	n/a	Downrange Fort Carson	FC C	2/12/2018	
CF2018-011 68th Combat Sustainment Support Battalion Dig Request, TAs 42 & 43	n/a	Downrange Fort Carson	FC C	2/12/2018	
CF2018-012 4th Sustainment Brigade Dig Request, TAs 42 and 43	n/a	Downrange Fort Carson	FC C	2/22/2018	
CF2018-013 244th Engineer Battalion Dig Request, TAs 5 & 7	n/a	Downrange Fort Carson	FC C	2/22/2018	
CF2018-014 52nd Brigade Engineer Battalion Dig Request, TA 7	n/a	Downrange Fort Carson	FC C	2/23/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
CF2018-015 588th Brigade Engineer Battalion Request, TAs 5 & 6	n/a	Downrange Fort Carson	FC C	2/22/2018	
CF2018-016 588th Brigade Engineer Battalion Dig Request, TA 50	n/a	Downrange Fort Carson	FC C	2/23/2018	
CF2018-017 52nd Brigade Engineer Battalion Dig Request, TA 28	n/a	Downrange Fort Carson	FC C	2/23/2018	
CF2018-018 4th Infantry Division Dig Request, TAs 6 & 11	n/a	Downrange Fort Carson	FC C	2/26/2018	
CF2018-019 64th Brigade Support Battalion Dig Request, Range 165	n/a	Downrange Fort Carson	FC C	3/1/2018	
CF2018-020 4th Infantry Division Warfighter Training Exercise 18-04 Dig Request, TAs 6 & 11	n/a	Downrange Fort Carson	FC C	3/19/2018	
CF2018-021 576th Engineer Company Dig Request, TA 13	n/a	Downrange Fort Carson	FC C	3/26/2018	
CF2018-022 71st Explosive Ordnance Detachment Dig Request, Range 150	n/a	Downrange Fort Carson	FC C	3/28/2018	
CF2018-023 2-77 Field Artillery Dig Request, TAs 50 & 51	n/a	Downrange Fort Carson	FC C	3/28/2018	
CF2018-025 588th Brigade Engineer Battalion Combined Arms Live Fire Training Exercise Dig Request, TAs 31 & 40	n/a	Downrange Fort Carson	FC C	4/3/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
CF2018-026 615th Engineer Company Dig Request, TA 40	n/a	Downrange Fort Carson	FC C	4/9/2018	
CF2018-027 2nd Infantry Brigade Combat Team Dig Request, TA 28	n/a	Downrange Fort Carson	FC C	4/10/2018	
CF2018-028 64th Brigade Support Battalion Dig Request, TAs 9 & 39	n/a	Downrange Fort Carson	FC C	4/13/2018	
CF2018-032 4-10 Calvary Regiment Chemical, Biological, Radiological, and Nuclear Decontamination Concept of Operations Dig Request, TA 40	n/a	Downrange Fort Carson	FC C	5/3/2018	
CF2018-033 183rd Support Maintenance Company Dig Request, TA 13	n/a	Downrange Fort Carson	FC C	5/3/2018	
CF2018-035 59th Quartermaster Company Dig Request, TA 14	n/a	Downrange Fort Carson	FC C	5/7/2018	
CF2018-036 64th Brigade Sustainment Battalion Dig Request, TAs 49 & 51	n/a	Downrange Fort Carson	FC C	5/9/2018	
CF2018-037 704th Brigade Sustainment Battalion Dig Request, TA 14	n/a	Downrange Fort Carson	FC C	5/9/2018	
CF2018-039 60th Ordnance Company Dig Request, TA 25	n/a	Downrange Fort Carson	FC C	5/14/2018	
CF2018-041 569th Engineer Company Dig Request, TA 7	n/a	Downrange Fort Carson	FC C	5/24/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
CF2018-043 4th Sustainment Brigade Dig Request, TA 5	n/a	Downrange Fort Carson	FC C	6/12/2018	
CF2018-044 2nd Infantry Brigade Combat Team Dig Request, TA 19	n/a	Downrange Fort Carson	FC C	6/20/2018	
CF2018-045 3rd Armored Brigade Combat Team Dig Request, TA 35	n/a	Downrange Fort Carson	FC C	7/5/2018	
CF2018-046 183rd Support Maintenance Company Dig Request, TA 10	n/a	Downrange Fort Carson	FC C	7/3/2018	
CF2018-047 704th Brigade Support Battalion Dig Request, TA 42	n/a	Downrange Fort Carson	FC C	7/5/2018	
CF2018-048 615th Engineer Company Dig Request, TA 30	n/a	Downrange Fort Carson	FC C	7/10/2018	
CF2018-049 4th Sustainment Brigade Dig Request, TA 24	n/a	Downrange Fort Carson	FC C	7/20/2018	
CF2018-050 569th Engineer Company Dig Request, TAs 5, 6, & 7	n/a	Downrange Fort Carson	FC C	8/1/2018	
CF2018-054 4th Engineer Battalion Dig Request, TA 11 & 13	n/a	Downrange Fort Carson	FC C	8/16/2018	

Table 2. Non-Exempted Undertakings Requiring Section 106 Consultation

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2018-009, 2018-088, & 2018-352 Construction and Operation of a Proposed High Voltage Electrical Power Test Facility	MCA17-002 SPC18-001	Downrange Fort Carson	10/12/2017 1/22/2018 9/26/2018	HC #72798 9/13/2017	<p>No historic properties affected</p> <p>2018-009 is a review of the soil boring locations associated with the geotechnical analysis for the project. Both 2018-088 and 2018-352 are updated NEPA reviews of the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2017-142 & 2017-253.</p>
2018-018 Construction and Operation of an Infantry Platoon Battle Course (IPBC) at Range 127 and Expansion of Range 153 for an Infantry Squad Battle Course (ISBC)	PN 72176	Downrange Fort Carson	10/23/2017	<p>CHS #68021 4/30/2015 (Range 127 IPBC)</p> <p>CHS #68295 10/9/2015 (Range 153 ISBC)</p>	<p>No adverse effects to historic properties (Range 127 IPBC)</p> <p>2018-018 is an amendment to the Request for Proposal for the Infantry Platoon Battle Course (IPBC) at Range 127</p> <p>Undertaking has been previously reviewed under NEPA project numbers 2014-115, 2014-355, 2015-248, 2015-410, 2016-276, 2017-187, 2017-321, & 2017-355.</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
2018-028, 2018-037, 2018-132, & 2018-249 Teller Dam Project	n/a	Downrange Fort Carson	11/8/2017 11/16/2017 2/16/2018 5/23/2018	HC #73216 1/23/2018	No historic properties affected 2018-028 is the review for the proposed borrow pit locations; 2018-037 is the 30% design review; 2018-132 is the 60% design review; and 2018-249 is the 100% design review. Section 106 consultation conducted only for the borrow pit locations. Undertaking has been previously reviewed under NEPA project numbers 2016-113, 2016-187, & 2017-249.
2018-234 & 2018-339 MSR 4 Road Repairs	DPW18-018	Downrange Fort Carson	5/14/2018	HC #74371 6/18/2018 (Original Project Scope) — (Revised Project Scope)	No adverse effects to historic properties 2018-234 is the initial review for the project; 2018-339 is a change in project scope. Additional Section 106 consultation is required for the revised project scope.
2018-264 Potential Rail Spur	n/a	Downrange Fort Carson	5/31/2018	—	2018-264 is a review of the potential location for a proposed rail spur near Gate 19. Section 106 will be initiated once it has been decided the project will proceed.
2018-291 Tomahawk Mine Access Road	CIV18-006	Downrange Fort Carson	6/25/2018	—	No adverse effects to historic properties The SHPO requested more information in correspondence dated August 2, 2018 (HC #74679).

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
2018-308 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 14, 21, 25 and 31) and PCMS (TAs 7 and 10)	DPT18-027	Downrange Fort Carson PCMS Numbered TAs	7/25/2018	HC #75068 10/22/2018	No historic properties affected Section 106 consultation period ends November 12, 2018.
2018-311 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 21, 24 and 31) and PCMS (TA 7)	DPT18-026	Downrange Fort Carson PCMS Numbered TAs	7/27/2018	HC #75068 10/22/2018	No historic properties affected Section 106 consultation period ends November 12, 2018.

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
2018-039 Fort Carson Stormwater Management Plan Review	n/a	n/a	11/28/2017	Document Review
2018-129 25-Year Easement Renewal to CenturyLink, Fort Carson	n/a	Fort Carson-wide	2/14/2018	<p>Renew the existing easement for a period of 25 years with CenturyLink (formerly US West Communications) for the continued operation of a telecommunication fiber optic cable. This easement extends from the northern boundary of Fort Carson near Gate 4 (B St entrance) to the southern boundary near Stone City Rd.</p> <p>No potential to effect historic properties</p>
2018-137 Renew Easement to Black Hills Energy, Fort Carson	n/a	Downrange Fort Carson	2/21/2018	<p>Renew the existing easement for a period of 25 years with Black Hills Energy for electrical lines that service Range 123.</p> <p>No potential to effect historic properties</p>
2018-255 Annual Review of the Integrated Cultural Resources Management Plan (ICRMP)	n/a	n/a	5/21/2018	Document Review
2018-340 Review of the 2018 Environmental Battle Book	n/a	n/a	8/29/2018	Document Review

**ENCLOSURE 2:
FORT CARSON DOWNRANGE PA TASK TRACKER
(CURRENT AS OF SEPTEMBER 30, 2018)**

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)

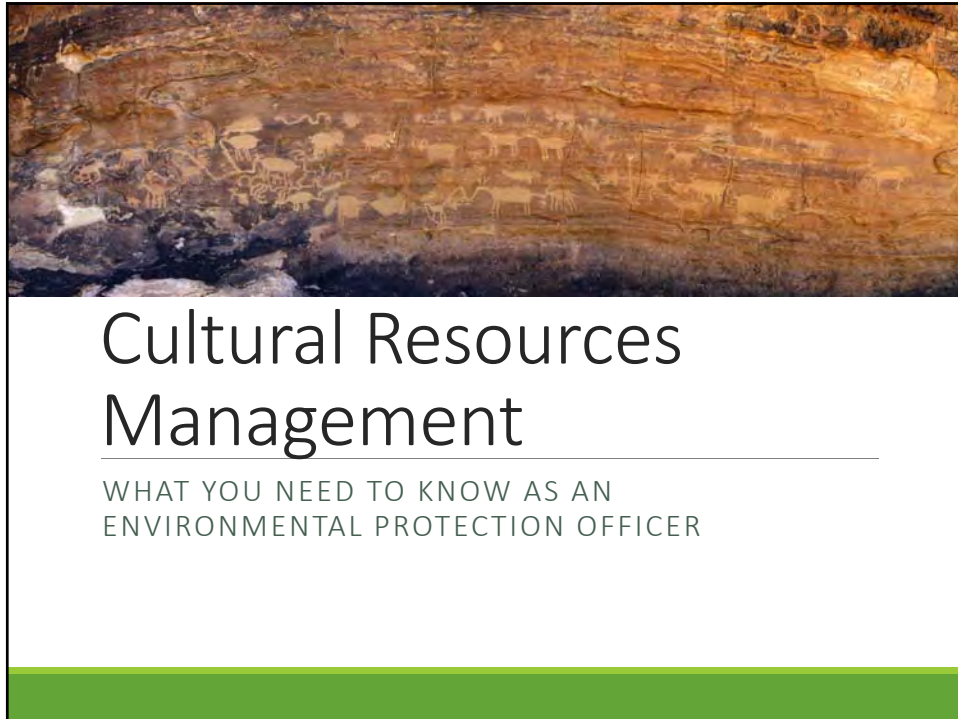
Stipulation	Action	Duration	Date Required	Remarks
I.C	Complete documentation on needs data sites or implement a protection measure	3 years after signing	03/30/2017	<p>Completed</p> <p>FY15: Contract awarded in August 2014 for the re-evaluation of the Turkey Creek Rock Art District sites. Technical report and associated site documentation was submitted to the SHPO on November 2, 2017</p> <p>FY16: Contract awarded in August 2015 for the re-evaluation of 16 sites. Technical report and associated site documentation for 5PE3281 submitted to the SHPO on May 10, 2017. Technical report and associated site documentation for the remaining 15 sites was submitted to the SHPO on October 26, 2017.</p> <p>FY17: No re-evaluations scheduled.</p> <p>FY18: No re-evaluations scheduled</p> <p>There are 23 remaining to be evaluated as funding becomes available. Protection strategy has been implemented at these sites.</p>
I.C.1	SHPO concurrence with NRHP eligibility determinations from re-evaluations	60 days after submission	TBD	<p>FY15: The SHPO responded via correspondence dated August 20, 2018 (HC #72565).</p> <p>FY16: The SHPO concurred with the determination of eligibility for 5PE3281 via correspondence dated July 6, 2017 (HC #64164). The SHPO provided a response for the remaining 15 sites in correspondence dated February 26, 2018 (HC #63877).</p>
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 February 6-8, 2018, at PCMS. In attendance were representatives from the Comanche Nation, Eastern Shoshone Tribe, Jicarilla Apache Nation, Northern Arapaho Tribe, Northern Cheyenne Nation, Southern Ute Tribe, Ute Mountain Ute Tribe, and Ute Indian Tribe.</p>
III.B	Implement site protection measures	3 years after signing	03/30/2017	<p>67 of 180 protected sites are completely enclosed by physical protection measures; 81 have corner markers or incomplete marking; all others are administratively protected.</p>

Stipulation	Action	Duration	Date Required	Remarks
III.C	Propose amended site protection measures and monitoring frequencies	As needed	n/a	FY18: Contract awarded in September 2017 to update inspection/monitoring frequencies Appendix 2 updated as part of the amendment executed May 2, 2018. Additional updates to Appendix have been made as of October 31, 2018, and are included in Appendix 5.
III.E	Provide training vehicles/aircraft with means of knowing site locations	3 years after signing	03/30/2017	Completed; update as necessary.
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections. FY19: Contract awarded in September 2018 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	Holistic study of the Hogback at PCMS was proposed at the Annual Tribal Consultation meeting in February 2018. Project funding has been requested for FY19.

Stipulation	Action	Duration	Date Required	Remarks
VI.B	Offsetting mitigation: Archaeological Context Project	Initiate within 3 years of signing	03/30/2017	<p>Contract was awarded in August 2016 for the first phase of the project.</p> <p>The draft annotated bibliography was forwarded to the committee for review on September 21, 2017, for review. No comments received.</p> <p>Draft Appendices A & C were forwarded to the committee for review on February 23, 2018. No comments received.</p> <p>Draft Overview & Synthesis was forwarded to the Advisory Committee on June 18, 2018. Comments were received from the Colorado Council of Professional Archaeologists on July 20, 2018; these comments and responses to the comments were forwarded to the committee on July 30, 2018.</p> <p>Draft Prioritized List of Data Gaps was forwarded to the committee for review on July 9, 2018.</p> <p>Final deliverables received on August 11, 2018, and were forwarded to the committee on October 24, 2018.</p>
VI.B	Offsetting mitigation: Santa Fe Trail Community Outreach Project	Initiate within 3 years of signing	03/30/2017	Awaiting formal proposal from Bent's Old Fort Chapter of the Santa Fe Trail Association for the Advisory Committee to review.
VI.B.2	Organize an advisory committee		03/30/2016	Last meeting held on July 31, 2018
VII.G	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017

ENCLOSURE 3:
ENVIRONMENTAL PROTECTION OFFICER (EPO) COURSE

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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

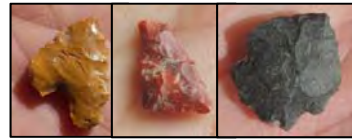
What are Cultural Resources?

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

FORT CARSON EPO COURSE

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

FORT CARSON EPO COURSE

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

FORT CARSON EPO COURSE

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

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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



8/23/2017

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14

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

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5

How Can You Help Protect and Preserve Cultural Resources?

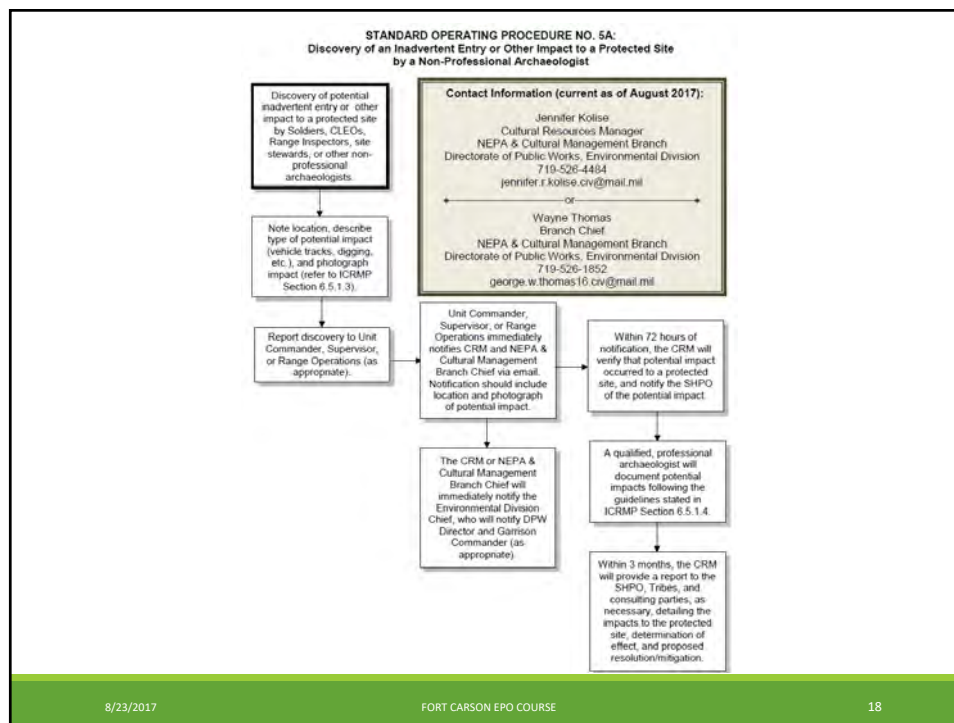
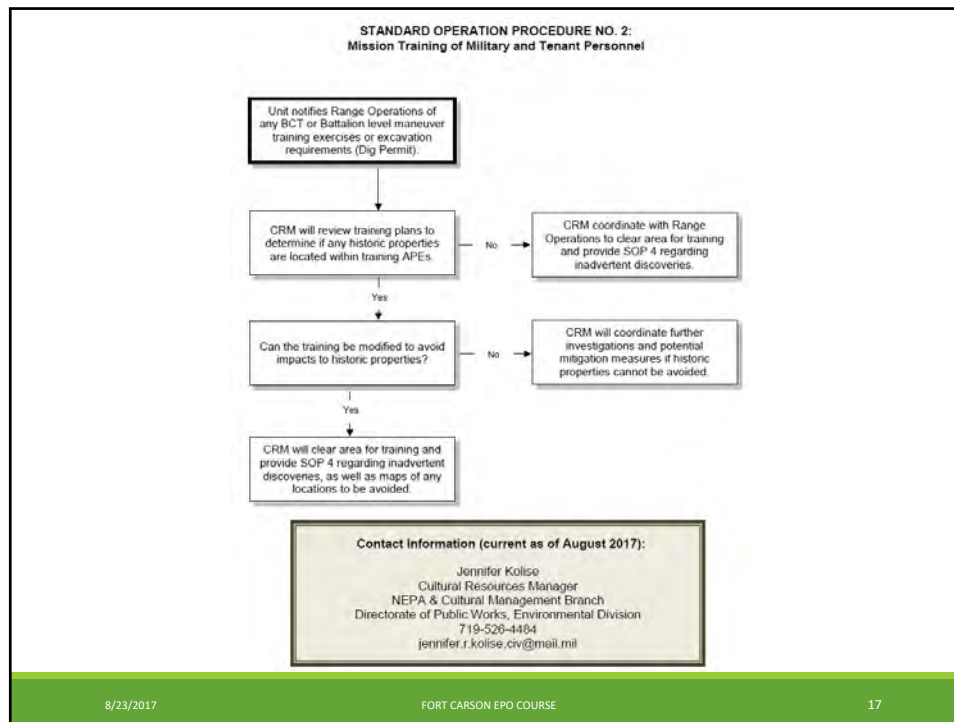
DO:

- 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!

8/23/2017

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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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19

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

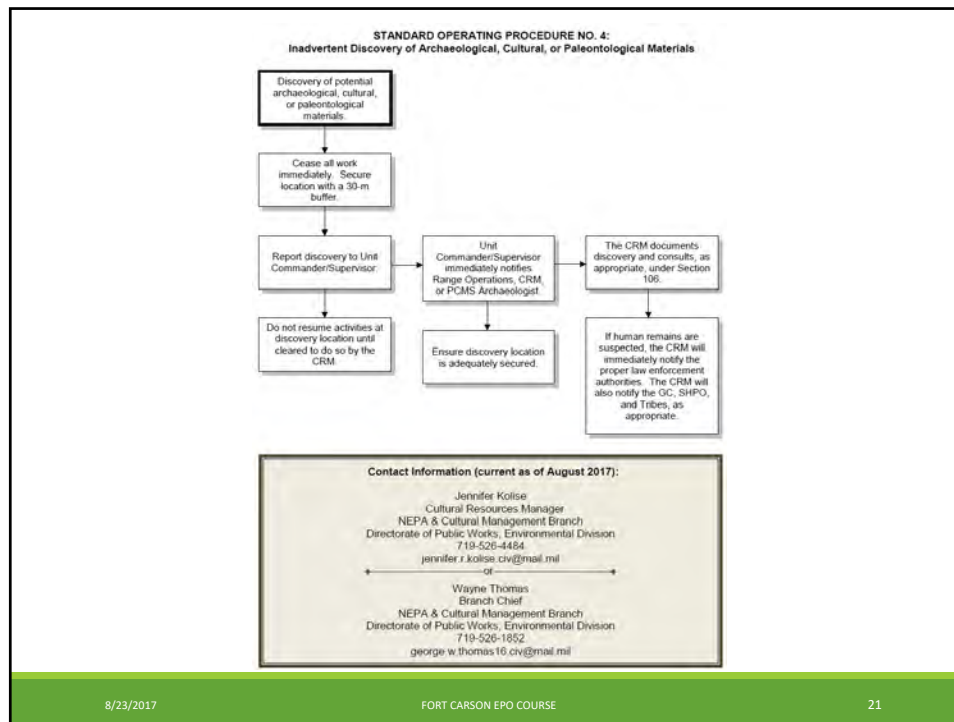
STOP WORK IMMEDIATELY

- 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.

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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

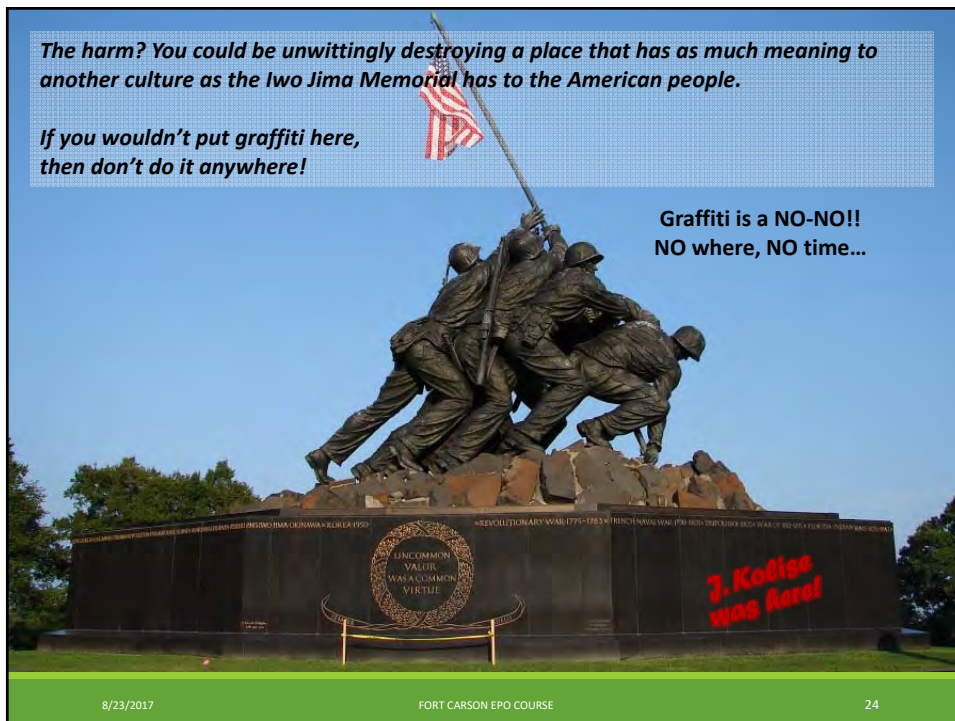
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23

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...**

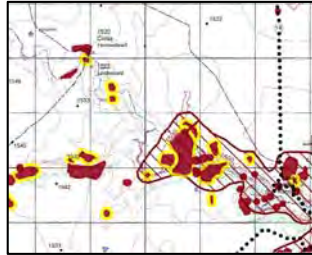


8/23/2017

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24

Site Protection Measures



Protected Resources JCR Map

Red = unmarked restricted area
Red with yellow outline = marked restricted area
Red hash-marked area = dismounted 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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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?
 - www.carson.army.mil/DPW/nepa.html

8/23/2017

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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

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27

Question 1

True or False:

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

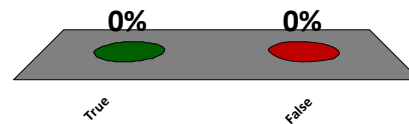
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28

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

- A. True
- B. False



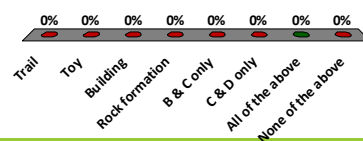
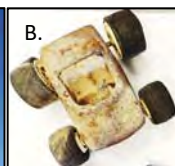
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29

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



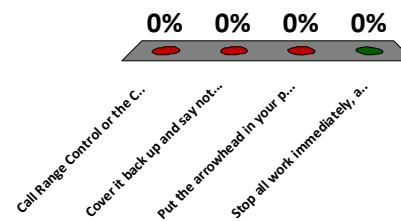
8/23/2017

FORT CARSON EPO COURSE

30

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

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31

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

- A. True
- B. False



8/23/2017

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32

ENCLOSURE 4:
COLORADO COUNCIL OF PROFESSIONAL ARCHAEOLOGISTS' COMMENTS ON FIRST
AMENDMENT TO THE FORT CARSON DOWNRANGE PA

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COLORADO COUNCIL OF PROFESSIONAL ARCHAEOLOGISTS

To: Ms. Jennifer Kolise,
Cultural Resources Manager (CRM)
Department of the Army
Us Army Installation Management Command
Directorate of Public Works
1626 Evans Street, Bldg 1219
Fort Carson, Co 80913-4143

Date: November 28, 2017

CC: Mark Tobias, History Colorado
Jason La Belle, President, Colorado Council of Professional Archaeologists

RE: Review of *First Amendment to 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* and

First Amendment to 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 Pinon Canyon Maneuver Site, Fort Carson, Colorado

Dear Ms. Kolise

I apologize for the delay in submitting this. I had anticipated submitting before Thanksgiving but other things got in the way. The CCPA has reviewed the draft of the amendment to the Programmatic Agreement for Fort Carson that you sent by email on October 25 and has the following comments:

First Amendment to 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

The addition on page 2 of “WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army;” will more clearly define the responsibilities if the USAG and cover situations not expected or understood at the time of the writing. This whereas should make clear all of the actions that require Section 106 compliance.

On page 4 in the first bullet item, line 6, need a comma after “Reservation” and “Utah, to be consistent with how such designations are presented in the rest of the bullet Item

Stipulation II, Exempted Undertakings, B: Air Assets, what are “aviation assets”? If you mean airplanes, why would they need to be restricted to roads through protected properties if they are flying overhead? Or are you referring to low-flying craft that could potentially stir up dust that could potentially erode a site. Or is dust disturbance not a concern? Another concern should be visual and noise intrusions from aircraft that probably cannot be restricted to existing, prescribed access roads through Protected Properties. This stipulation should be clarified.

If training requirements specify that aircraft operations must occur during periods of very low visibility or at night what measures are in place to ensure that air assets can adequately identify the prescribed routes and stay within the prescribed route boundaries through Protected Properties?

Stipulation IV. A: Need to specify professional qualifications for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties.

Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.

Review of: *First Amendment to 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 Pinon Canyon Maneuver Site, Fort Carson, Colorado*

The inclusion of “WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army; and” again will more clearly define the responsibilities of the USAG and cover situations not expected or understood at the time of the writing. This whereas should make clear all of the actions that require Section 106 compliance

Stipulation IV. A: Is there a place in the PA and its appendices where the qualifications for monitors and inspectors is spelled out? If the qualifications are in the ICRMP then it should say so in the PA somewhere for the benefit of those reading the documents.

Stipulation VII. C. the revised wording is well considered based on experience and practice gained during the first years of the PA and clearly needed.

Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.

Appendix 1. A.3.(c): firewood programs? Commercial sales or private use? Is it safe to assume that the areas have been thoroughly inventoried and there are no culturally modified trees in the area? Will any culturally modified trees be clearly marked for avoidance if they exist?

Appendix 1. D., Paragraph 1, line 4: "... this area *are* ..."? The grammar is terrible it should be either "**these areas are**" or "*this area is*" to avoid any possibility of confusion.

Appendix 3. 1.1 Need to specify qualifications of a "professional archaeologist" for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties 1.1.3.: Is it understood that the inspectors have reviewed previous documentation of a site before visiting the site to be inspected? Also, will an archaeologist accompany a Conservation Law Enforcement Officers (CLEOs), Range Inspectors, or site stewards? If not, will they be required to undergo training and, if so, what?

Appendix 3, 1.1.4: Paragraph 2, lines 1&2: is this usage of within 72 hours of incursion event occurring assuming that the inspectors and/or monitors are certified trackers certified as either Joel Hardin professional Tracker or Universal Tracking s Services certified trackers who might be more skilled in making a determination of a 72 hour period, assuming that any authorized activities could be inspected up to 90 days after the event? Otherwise it seems an open question as to how the inspector or monitor is able to determine that the detected event occurred within the specified 72-hour interval.

General comment: The documentation specified in Appendix G for documenting impacts to sites seems to be thought-out and adequate to the task and outcomes desired,

The CCPA thanks you for the opportunity to comment on the draft. If you have any questions or wish to discuss, I am available.

Sincerely,



Kimball M. Banks, PhD
Director of Strategic Development
Metcalf Archaeological Consultants, Inc.
651 Corporate Circle, Suite 200
Golden CO 80401

Phone: 303.425.4507
kbanks@metcalfarchaeology.com

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REPLY TO
ATTENTION OF

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

December 13, 2017

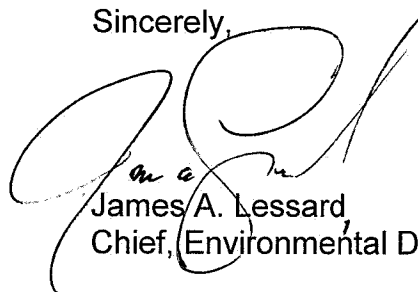
Dr. Kimball Banks, Fort Carson CCPA Liaison
Metcalf Archaeological Consultants, Inc.
651 Corporate Circle, Suite 200
Golden, Colorado 80401

Dear Dr. Banks:

Thank you your correspondence dated November 28, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities Down Range Fort Carson, Colorado* (Fort Carson Downrange PA), and *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). The intention of this letter is to address your comments on the proposed amendments. Enclosure 1 includes the USAG Fort Carson's response to your comments. To ensure, all concerns have been adequately addressed, your specific comment has been cited in its entirety followed by our response. The USAG Fort Carson appreciates your organization's views on this matter.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-503-6136; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,


James A. Lessard,
Chief, Environmental Division

Enclosure

Enclosure 1: USAG Fort Carson's Response to Specific Comments from the Colorado Council of Professional Archaeologists on the Proposed Amendments to the Fort Carson Downrange and PCMS PAs

The following are the USAG Fort Carson's responses to the concerns raised by the Colorado Council of Professional Archaeologists (CCPA) in correspondence dated November 28, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities Down Range Fort Carson, Colorado* (Fort Carson Downrange PA), and *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA).

Fort Carson Downrange PA-Specific Comments

CCPA's Comment #1: *The addition on page 2 of "WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army;" will more clearly define the responsibilities if the USAG and cover situations not expected or understood at the time of the writing. This whereas should make clear all of the actions that require Section 106 compliance.*

USAG Fort Carson's Response #1: The Whereas clause has been edited to state: **"WHEREAS**, this Agreement applies to all undertakings, as defined in 36 CFR 800.16(y), within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the USAG; and..."

CCPA's Comment #2: *On page 4 in the first bullet item, line 5, need a comma after "Reservation" and "Utah, to be consistent with how such designations are presented in the rest of the bullet item*

USAG Fort Carson's Response #2: Thank You. A comma has been inserted between "Reservation" and "Utah" for consistency. The clause in the PCMS PA has also been updated accordingly.

CCPA's Comment #3: *Stipulation II, Exempted Undertakings, B: Air Assets, what are "aviation assets"? If you mean airplanes, why would they need to be restricted to roads through protected properties if they are flying overhead? Or are you referring to low-flying craft that could potentially stir up dust that could potentially erode a site. Or is dust disturbance not a concern? Another concern should be visual and noise intrusions from aircraft that probably cannot be restricted to existing, prescribed access roads through Protected Properties. This stipulation should be clarified.*

If training requirements specify that aircraft operations must occur during periods of very low visibility or at night what measures are in place to ensure that air assets can

adequately identify the prescribed routes and stay within the prescribed route boundaries through Protected Properties.

USAG Fort Carson's Response #3: The intent of the exception is in reference to vehicles, not the aviation assets. For clarification purposes, Stipulation II.B now reads "During the implementation of an exempted undertaking vehicles (except for travel on an existing road that may traverse a site) and aviation assets are not permitted within the perimeter of protected properties listed in Appendix 2." Stipulation II.B in the PCMS PA has been updated accordingly.

Aviation assets include rotary aircraft and small fixed-wing aircraft, such as unmanned aerial systems. Fort Carson Regulation 95-1 has provisions for minimum altitude and distance from various objects, including protected resources.

Since the exception for travel on existing roads is not applicable to the aviation assets, your questions regarding their travel along these authorized corridors through protected properties will not be addressed further.

CCPA's Comment #4: *Stipulation IV.A: Need to specify professional qualifications for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties.*

USAG Fort Carson's Response #4: Stipulation IV.A references the reader to Appendix 5, which does state who can conduct inspections versus monitoring. The qualifications are discussed in the Integrated Cultural Resources Management Plan (ICRMP). The appropriate section of the ICRMP is now referenced in the Appendix 5.

CCPA's Comment #5: *Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.*

USAG Fort Carson's Response #5: Appendix 1 has not been changed as part of the proposed amendments to the Fort Carson Downrange PA. The USAG Fort Carson has completed its inventory of the Downrange PA's area of potential effects (APE) in accordance with Stipulation I.B. The remaining acreage is exempt from survey as agreed upon in Stipulation VI and Appendix 4. Figure 4 depicts the Inventory Status of Fort Carson (current as of November 2017). Appendix 2 lists all known protected properties within the APE covered by the PA. Locations of protected properties are provided to the proponent of an undertaking, as appropriate.

PCMS PA-Specific Comments

CCPA's Comment #1: *The inclusion of "WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army: and" again will more clearly define the responsibilities if the USAG and cover situations not expected or understood at the time of writing. This whereas should make clear all the actions that require Section 106 compliance.*

USAG Fort Carson's Response #1: Please see our response to Comment #1 on the Fort Carson Downrange PA amendments.

CCPA's Comment #2: *Stipulation IV.A: Is there a place in the PA and its appendices where the qualifications for monitors and inspectors is spelled out? If the qualifications are in the ICRMP then it should say so in the PA somewhere for the benefit of those reading the documents.*

USAG Fort Carson's Response #2: Stipulation IV.A references the reader to Appendix 3, which does state who can conduct inspections versus monitoring. The qualifications are discussed in the ICRMP. The appropriate section of the ICRMP is now referenced in the Appendix 3.

CCPA's Comment #3: *Stipulation VII.C. the revised wording is well considered based on experience and practice gained during the first years of the PA and clearly needed.*

USAG Fort Carson's Response #3: Thank you for your comment.

CCPA's Comment #4: *Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.*

USAG Fort Carson's Response #4: Approximately 93% of the Piñon Canyon Maneuver Site (PCMS) has been inventoried. The remaining 7% is located within the canyon areas and interior fence boundary. In accordance with Stipulation I.C, additional survey is not required unless it is necessary for the execution of an undertaking that has not been identified as exempted in Appendix 1. Figure 3 depicts the areas that have not been inventoried on the PCMS (current as of November 2017). All known protected properties are listed in Appendix 2. Locations of protected properties are provided to the proponent of an undertaking, as appropriate.

CCPA's Comment #5: *Appendix 1.A.3.(c): firewood programs? Commercial sales or private use? Is it safe to assume that the areas have been thoroughly inventories and there are no culturally modified trees in the area? Will any culturally modified trees be clearly marked for avoidance if they exist?*

USAG Fort Carson's Response #5: The language within Appendix 1.A.3(c) has not been changed as part of the proposed amendments to the PCMS.

The Fort Carson Firewood Program is for personal use only. An area would be identified and marked by the Fort Carson Forester from which firewood could be collected. The Fort Carson Forester coordinates with the Fort Carson Cultural Resources Manager and others programs when determining from which areas firewood can be gathered. If culturally-modified trees did exist on the PCMS, they would be clearly marked as off limits.

CCPA's Comment #6: *Appendix 1.D., Paragraph 1, line 4: "...this area are..."? The grammar is terrible it should be either "**these areas are**" or "this area is" to avoid any possibility of confusion.*

USAG Fort Carson's Response #6: Thank you. The wording has been changed to state: "This area is..."

CCPA's Comment #7: *Appendix 3. 1.1 Need to specify qualifications of a "professional archaeologist" for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties 1.1.3: Is it understood that the inspectors have reviewed previous documentation of a site before visiting the site to be inspected? Also, will an archaeologist accompany a Conservation Law Enforcement Officers (CLEOs), Range Inspectors, or site stewards? If not, will they be required to undergo training and, if so, what?*

USAG Fort Carson's Response #7: The intent of routine inspections is to determine the effectiveness of protection measures, looking to see if anyone has driven into the site, dug in the site, bivouacked in the site, etc. As such, a qualified, professional archaeologist is not needed to conduct these inspections. If an inspector notes an entry or other impact, then a Secretary of the Interior (SOI)-qualified, professional archaeologist will oversee the documentation and assessment of the impact.

Conservation Law Enforcement Officers are trained to conduct site inspections. Range Inspectors are trained in documenting and assessing maneuver damage. Therefore, both are more than qualified to determine if a site has been impacted during military training or other human activities. Site stewards are volunteers who will undergo training by Fort Carson Cultural Resources Program staff to inspect sites. These volunteers will likely be members of the Colorado Archaeological Society or similar organization.

CCPA's Comment #8: *Appendix 3, 1.1.4: Paragraph 2, lines 1&2: is this usage of within 72 hours of incursion event occurring assuming that the inspectors and/or monitors are certified trackers certified as either Joel Hardin professional Tracker or Universal Tracking s Services certified trackers who might be more skilled in making a determination of a 72 hour period, assuming that any authorized activities could be inspected up to 90 days after the event? Otherwise it seems an open question as to*

how the inspector or monitor is able to determine that the detected event occurred within the specified 72-hour interval.

USAG Fort Carson's Response #8: Based on your comment, we realize the statement is not as clear as we had intended concerning the 72-hour window. To clarify, within 72 hours of being notified of the entry or other impact, the Cultural Resources Manager must notify the Colorado State Historic Preservation Officer. The wording has been changed to state: "Per Stipulation IV.C of the PCMS PA, the CRM must notify the Colorado State Historic Preservation Officer (SHPO) within 72 hours of being informed about any vehicle entry or other impact that may have occurred." Appendix 5, Section 1.1.4 of the Fort Carson Downrange PA has been updated accordingly.

CCPA's Comment #9: *General comment: The documentation specified in Appendix G for documenting impacts to sites seems to be thought-out and adequate to the task and outcomes desired.*

USAG Fort Carson's Response #9: Thank you for your comment.

FISCAL YEAR (FY) 2018 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, 2018

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, 2017, through September 30, 2018 and includes information as outlined in Stipulation VI.A. It has been distributed electronically to the SHPO and concurring parties and is available online at: <http://www.carson.army.mil/organizations/dpw.html#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, 2017, and September 30, 2018. Twenty-eight 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 with the areas of potential effects (APEs) covered by the PCMS PA that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA). Five undertakings required Section 106 consultation.

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

III. Action Updates

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

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

B. Cultural Resources Awareness Training

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

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated August 2017 (Enclosure 3)
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; available online at: <http://www.carson.army.mil/organizations/dpw.html> (click on the link titled “DPW Programs and Services” on the left side of the page, then scroll up half a screen)
- Cultural Resources Awareness Video – available online at: <http://www.carson.army.mil/organizations/dpw.html#three>

Comments concerning the adequacy of the training materials were received from Not 1 More Acre! via correspondence dated November 16, 2017. Enclosure 4 includes their correspondence, as well as the USAG Fort Carson’s response to those comments.

C. Brigade Training Exercises

Between February 18 and March 1, 2018, the 4th Combat Aviation Brigade (CAB) conducted a brigade training exercise (referred to as “Eagle Strike”) at the PCMS and Fort Carson. After action inspections were completed by March 1, 2018. No protected resources were entered. The after action report was submitted to the SHPO, culturally-affiliated Native American Tribes, and other consulting and interested parties on April 30, 2018.

The 3rd Armored Brigade Combat Team (3ABCT) conducted a brigade training exercise (referred to as “Iron Strike”) at the PCMS between August 20 and September 15, 2018. After action inspections were initiated September 18, 2018; the CRM and PCMS Archaeologist also conducted site inspections during the exercise. To date, 62 protected resources have been potentially entered. Documentation of these entries is ongoing. The after action report will be submitted to the SHPO, culturally-affiliated Native American Tribes, and other consulting and interested parties no later than December 15, 2018.

Currently, there are no brigade training exercises scheduled to occur at the PCMS.

D. Inadvertent Entries and/or Impacts to Historic Properties

On May 4, 2018, an archaeologist, who was conducting research at site 5LA2240, noted non-tactical vehicle tracks that entered the southwestern edge of the site, and reported this entry to the Cultural Resources Manager (CRM). The SHPO was notified via email on May 4, 2018. The vehicle tracks and boot prints are located in the extreme southwestern portion of the site. The tracks extended for approximately 100 meters, paralleling the southern boundary of the site, before turning around and exiting along the same path. No cultural materials nor cultural features were observed in the tracks. A

Memorandum for Record and supporting documentation was submitted to the SHPO on June 21, 2018. Via correspondence dated July 2, 2018 (HC #65747), the SHPO concurred with the USAG Fort Carson's finding of "no adverse effect" to historic properties.

As noted in Section C above, 62 protected resources had been noted as potentially entered during the after action inspections for the 3ABCT "Iron Strike" Training Exercise. Documentation of these entries is still ongoing.

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 Lockwood Canyon Wildland Fire event are considered immediate rescue and salvage operations conducted to preserve life or property, and as such, are exempt from the provisions of Section 106. The wildland fire started July 12, 2018, with fire suppression activities concluding on July 14, 2018. Approximately 10 acres within Training Area (TA) E – Lockwood Canyon were impacted. The fire ignition was related to lightening. There are no historic properties within the wildland fire footprint.

Per 36 CFR 800.12(d), fire suppression activities associated with the Three Sheds Wildland Fire event are considered immediate rescue and salvage operations conducted to preserve life or property, and as such, are exempt from the provisions of Section 106. The wildland fire started July 26, 2018, with fire suppression activities concluding on July 28, 2018. Approximately 23 acres within TA 10 were impacted. The fire ignition was related to lightening. There are no historic properties within the wildland fire footprint.

Per 36 CFR 800.12(d), fire suppression activities associated with the Dry Gulch Fires Wildland Fire event are considered immediate rescue and salvage operations conducted to preserve life or property, and as such, are exempt from the provisions of Section 106. The wildland fire started August 30, 2018, with fire suppression activities concluding on August 31, 2018. Approximately 40 acres within TA 7 were impacted. The fire ignition was related to military training activities. There are no historic properties within the wildland fire footprint.

G. Amendment

The First Amendment to the PCMS PA was executed on April 24, 2018. This amendment 1) standardized the language between the PCMS PA and the Fort Carson-specific PAs; 2) updated Stipulation IV to better describe the site inspection and monitoring program; and 3) clarified certain stipulations.

Comments on the proposed amendments were received from the Colorado Council of Professional Archaeologists (November 28, 2017), Otero County Board of

Commissioners (November 27, 2017), and Not 1 More Acre! (November 27, 2017; January 16, 2018; and January 30, 2018). Enclosure 5 includes these comment letters and the USAG Fort Carson's response letters.

Since the amendment was executed, Appendix 2 of the PA has been updated. A version of the updated Appendix 2 with changes denoted is included in Enclosure 6.

H. Dispute Resolution

Not 1 More Acre! and the Otero County Board of Commissioners have expressed concerns regarding the implementation of the PCMS PA. Enclosures 4 and 5 include their correspondence and the USAG Fort Carson's responses.

I. Other

Section 106 consultation on the 2010 2-4 BCT "Warhorse Rampage" Training Exercise, the 2013 2-4 BCT "Warhorse Charge" Training Exercise, the 2015 1SBCT "Raider Focus I" Training Exercise, and 2017 1SBCT "Raider Focus II" Training Exercise is ongoing. On January 18, 2018, updated information, as well as findings of effects, was provided to the SHPO regarding these past four exercises. USAG Fort Carson and SHPO staff met on September 12, 2018, to discuss the resolution of adverse effects to historic properties directly and indirectly resulting from these training exercises. Of the 153 sites entered during one (or more) of these past four exercises, the USAG Fort Carson lacks concurrence from the SHPO on findings of effects for only 16 of these sites. Enclosure 7 includes correspondence during the reporting period concerning these consultation efforts.

Report compiled by:

Jennifer R. Kolise
Cultural Resources Manager

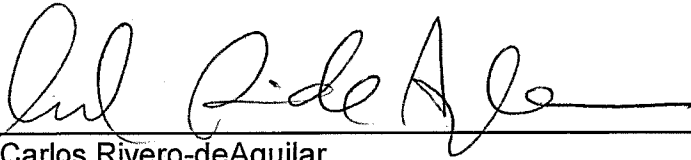
Approved by:



Wayne Thomas
Chief, NEPA and Cultural Management Branch

1 Nov 2018

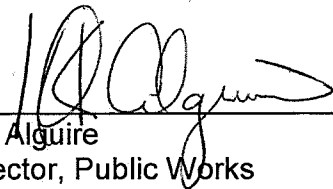
Date



Carlos Rivero-deAguilar
Chief, Environmental Division

2 Nov 2018

Date



Hal Alguire
Director, Public Works

5 Nov 2018

Date

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ENCLOSURE 1:
ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY18 REPORTING PERIOD (OCTOBER 1, 2017, THROUGH SEPTEMBER 30, 2018) 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
2018-001, 2018-004, 2018-119, & 2018-205 FY18 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/10/2017 10/25/2017 2/8/2018 4/16/2018	<p>2018-001 is the initial review for the project. 2018-004 and 2018-119 are reviews of proposed scope changes; and 2018-205 is an updated NEPA review, as it has been over six months since last reviewed and portions of the project had not been initiated.</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in February 2018 for portion of the project within the Turkey Creek Complex (see Enclosure 1, Table 2 of the FY18 Annual Report for the Fort Carson Built Environment PA).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</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
2018-023 FY18 Survey for and Abatement of Asbestos-Containing Materials / Lead-Based Paint at Fort Carson and PCMS	n/a	Main Post Turkey Creek Complex Downrange Fort Carson PCMS-wide	BE I.A2 BE I.C2 BE I.D1i BE I.D2i BE I.D3c BE I.D4 FC D1b PC A2b PC B4a2 PC C3a1 PC D3a1	10/31/2017	Surveys for and/or abatement of asbestos-containing materials and lead-based paint must be conducted prior to carpet removal and/or installation, building renovation activities, and ground-disturbing activities.
2018-061 Conversion of the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) to an Armored Brigade Combat Team (ABCT)	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.C3 FC A FC B FC C PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	1/2/2018	The Army is proposing to convert the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) stationed at Fort Carson into an Armored Brigade Combat Team (ABCT) or re-station and convert to an ABCT at Fort Riley, Kansas; Fort Bliss, Texas; Fort Hood, Texas; or Fort Stewart, Georgia. 2018-061 is the review of the Army's Draft Programmatic Environmental Assessment (PEA) and Draft Finding of No Significant Impacts (FNSI) for this proposed action.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-079 Integrated Training Area Management (ITAM) in TAs 2 and 7, PCMS	DPT16-023	PCMS Numbered TAs	PC B4b1 PC B4b2	1/19/2018	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>2018-079 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-451.</p>
2018-080 Integrated Training Area Management (ITAM) in TA 7, PCMS	DPT16-024	PCMS Numbered TAs	PC B4b1 PC B4b2	1/19/2018	<p>In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.</p> <p>2018-080 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated.</p> <p>Undertaking has been previously reviewed under NEPA project number 2016-452.</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
2018-081 Integrated Training Area Management (ITAM) Projects at PCMS and Fort Carson	DPT16-025	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	1/19/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. 2018-081 is an updated NEPA review for the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project number 2016-456.
2018-100 4th Combat Aviation Brigade (CAB) "Eagle Strike" Training Exercise, Fort Carson and PCMS	n/a	Downrange Fort Carson PCMS-wide	FC A FC B FC C PC A.1 PC B.1 PC B.2 PC B.3 PC C.1 PC C.2 PC D.1 PC D.2	1/30/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-118 Construction and Operation of a Contractor-Owned and Operated Fuel Facility at PCMS	n/a	PCMS Cantonment	PC A2a PC A2d	1/9/2018	Section 106 consultation completed in October 2013 (CHS #64716, 09/25/2013) prior to execution of the PCMS Programmatic Agreement in 2014. 2018-118 is a review of the 2018 Environmental Condition of Property document for the project. Undertaking has been previously reviewed under NEPA project numbers 2013-490 and 2014-433.
2018-133 Install Heaters and Ductwork, Bldg B290	PCM18-001	PCMS Cantonment	PC A2b	2/20/2018	
2018-166 Lockwood Canyon Road Repair / Improvements	PCM18-003	PCMS Numbered TAs PCMS Lettered TAs	PC B4a2 PC C3a1	3/19/2018	Remove several culverts, and replace with smaller multiple culverts. Install new culverts. Repair roadside ditch by removing and cleaning rip-rap and placing as improved V-ditch. Place waddles as necessary up-slope of ditch to prevent sediment migration.
2018-173 FY18 Invasive Species Treatments	n/a	Main Post Downrange Fort Carson PCMS-wide	BE I.B3 FC D2b PC A3b PC B4b2 PC C3b2 PC D3b2	3/22/2018	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.
2018-208 Tree Removal along MSRs 1 and 3 at PCMS	PCM18-006	PCMS Numbered TAs	PC B4b2	4/19/2018	Trees within 150 feet of MSRs 1 and 3 near the Four Corners area will be removed using a masticator attached to a Bobcat.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-227 Repair Range 9 Target Access Road, PCMS	PCM18-007	PCMS Numbered TAs	PC B4a2	5/2/2018	The work includes grading the existing, perimeter two-track roads that access the targets on Range 9.
2018-228 Tamarisk Biocontrol Study	n/a	Downrange Fort Carson PCMS-wide	FC D2a FC D2b PC B4b1 PC B4b2 PC D3b1 PC D3b2	5/3/2018	Scientific study to assess the phenology of tamarisk and biocontrol agent, tamarisk leaf beetle, on Fort Carson and PCMS. Surveys will include specimen collection of tamarisk and tamarisk leaf beetles, as well as, time lapse photography of plants. Cameras will be mounted onto trees where available or t-post (or similar post) if necessary.
2018-232 Repair PCMS Runway	PCM18-008	PCMS Cantonment	PC A2b	5/9/2018	Remove and replace existing aggregate wearing surface with a new aggregate base course utilizing fractured rock, engineered gradation, moisture conditioned and sealed with a binding compound, on the runway, taxiway and apron. Stockpile removed base on the cantonment for future use.
2018-306 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 24 and 25) and PCMS (TA 7)	DPT18-024	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/25/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-307 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 20, 40, 42 and 55) and PCMS (TA 7)	DPT18-025	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/25/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair.
2018-308 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 14, 21, 25 and 31) and PCMS (TAs 7 and 10)	DPT18-027	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/25/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Section 106 consultation is ongoing for portions of the project (see Table 2).
2018-309 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for TAs 7 and 10, PCMS	DPT18-028	PCMS Numbered TAs	PC B4a2 PC B4b1 PC B4b2	7/25/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Section 106 consultation is ongoing for portions of the project (see Table 2).

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-311 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 21, 24 and 31) and PCMS (TA 7)	DPT18-026	Downrange Fort Carson PCMS Numbered TAs	FC D1b FC D2a PC B4a2 PC B4b1 PC B4b2	7/27/2018	In order to maintain sustainable training lands, the Integrated Training Area Management (ITAM) Program is proposing to perform land maintenance activities, such as trail rehabilitation, drainage bank sloping, culvert installation, and erosion control dam repair. Section 106 consultation is ongoing for portions of the project (see Table 2).
2018-314 3rd Armored Brigade Combat Team (3ABCT) "Iron Strike" Training Exercise, PCMS	n/a	PCMS	PC A1 PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2		

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2018-333 FY19 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS	n/a	Main Post Bird Farm Recreation Area Turkey Creek Complex Downrange Fort Carson PCMS Numbered TAs	BE I.B3 FC D2b PC B4b2	10/3/2018	<p>2018-333 is the initial review for the FY19 project; but several of the proposed locations were reviewed as part of the FY18 Prescribed Fire and Wildland Fuels Reduction Plan (NEPA project numbers 2018-001, 2018-004, 2018-119, & 2018-205)</p> <p>Information provided to proponent for avoidance of protected cultural resources.</p> <p>Section 106 consultation was completed in February 2018 for portion of the project within the Turkey Creek Complex (see Enclosure 1, Table 2 of the Fort Carson Built Environment PA).</p> <p>Section 106 consultation is required for the portion of the project within Bird Farm Recreation Area (see Enclosure 1, Table 2 of the Fort Carson Built Environment PA).</p> <p>Portions of the undertaking have been previously reviewed under NEPA project numbers 2014-586, 205-489, 2016-368, 2016-454, 2017-012, 2017-049, & 2017-174.</p>
CF2018-031 4th Engineer Battalion Dig Request, TA 10 & Range 3	n/a	PCMS Numbered TAs	PC B3	4/24/2018	
CF2018-040 68th Combat Sustainment Support Brigade Dig Request, TAs 9 & 10	n/a	PCMS Numbered TAs	PC B3	5/21/2018	
CF2018-051 59th Quartermaster Company Dig Request, TA 1	n/a	PCMS Numbered TAs	PC B3	8/1/2018	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
CF2018-052 4th Engineer Battalion Dig Request, TA 7	n/a	PCMS Numbered TAs	PC B3	8/10/2018	
CF2018-053 576th Engineer Company Dig Request, TA 7	n/a	PCMS Numbered TAs	PC B3	8/10/2018	
CF2018-055 4 Sustainment Brigade Dig Request, TA 1	n/a	PCMS Numbered TAs	PC B3	8/20/2018	

Table 2. Non-Exempted Undertakings Requiring Section 106 Consultation

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2018-165 Repair Culverts along MSR 1A, PCMS	PCM18-002	PCMS Lettered TAs	3/15/2018	CHS #68755 8/21/2015	No adverse effects to historic properties 2018-165 is an updated NEPA review of the project, as it has been over six months since last reviewed and project had not been initiated. Undertaking has been previously reviewed under NEPA project numbers 2015-004 & 2015-495.
2018-239 & 2018-332 FY18 PCMS Resource Protection Project	DPT18-031	PCMS Numbered TAs PCMS Lettered TAs	5/16/2018 8/16/2018	HC #74451 07/25/2018	No adverse effects to historic properties This is a marking project for protected resources.
2018-308 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 14, 21, 25 and 31) and PCMS (TAs 7 and 10)	DPT18-027	Downrange Fort Carson PCMS Numbered TAs	7/25/2018	HC #75068 10/22/2018	No historic properties affected Section 106 consultation period ends November 12, 2018.
2018-309 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for TAs 7 and 10, PCMS	DPT18-028	PCMS Numbered TAs	7/25/2018	HC #75068 10/22/2018	No historic properties affected Section 106 consultation period ends November 12, 2018.
2018-311 Integrated Training Area Management (ITAM) Program Land Rehabilitation Projects for Fort Carson (TAs 21, 24 and 31) and PCMS (TA 7)	DPT18-026	Downrange Fort Carson PCMS Numbered TAs	7/27/2018	HC #75068 10/22/2018	No historic properties affected Section 106 consultation period ends November 12, 2018.

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
2018-039 Fort Carson Stormwater Management Plan Review	n/a	n/a	11/28/2017	Document Review
2018-046 Review of the 2015 PCMS Environmental Impact Statement (EIS) in Response to Army's Programmatic Environmental Assessment for the Conversion of the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) to an Armored Brigade Combat Team (ABCT) to Determine Sufficiency	n/a	PCMS-wide	2/7/2018	<p>The Army is proposing to convert the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) stationed at Fort Carson into an Armored Brigade Combat Team (ABCT) or re-station and convert to an ABCT at Fort Riley, Kansas; Fort Bliss, Texas; Fort Hood, Texas; or Fort Stewart, Georgia.</p> <p>This Record of Environmental Decision (REC) documents the review regarding the need to supplement the 2015 PCMS Environmental Impact Statement (EIS) to accommodate training at PCMS of two ABCTs and one SBCT configuration stationed at Fort Carson.</p>
2018-255 Annual Review of the Integrated Cultural Resources Management Plan (ICRMP)	n/a	n/a	5/21/2018	Document Review
2018-280 Renew Easement to Qwest Corporation on PCMS	n/a	PCMS Cantonment	6/18/2018	Renew an existing easement for a period of 25 years to Qwest Corporation for the continued operation of their direct-buried telephone cable.
2018-340 Review of the 2018 Environmental Battle Book	n/a	n/a	8/29/2018	Document Review

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2018-338 Review of the 2015 PCMS Environmental Impact Statement (EIS) in Response to Army's Proposal to Replace the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) with a Stryker Brigade Combat Team (SBCT) to Determine Sufficiency	n/a	PCMS-wide	8/28/2018	<p>The Army is proposing to convert the 4th Infantry Division's 2nd Infantry Brigade Combat Team (IBCT) stationed at Fort Carson into an Armored Brigade Combat Team (ABCT) or re-station and convert to an ABCT at Fort Riley, Kansas; Fort Bliss, Texas; Fort Hood, Texas; or Fort Stewart, Georgia. If the ABCT is not stationed at Fort Carson, then the Army is proposing to relocate a second Stryker Brigade Combat Team (SBCT) to Fort Carson.</p> <p>This Record of Environmental Decision (REC) documents the review regarding the need to supplement the 2015 PCMS Environmental Impact Statement (EIS) to accommodate training at PCMS of two SBCTs and one ABCT configuration stationed at Fort Carson.</p>

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ENCLOSURE 2:
PCMS PA TASK TRACKER
(CURRENT AS OF SEPTEMBER 30, 2018)

Stipulation	Action	Duration	Date Required	Remarks
I.A.1	GIS shapefiles and master site index provided to SHPO	90 days after signing	7/22/2014	Completed; provide updates as necessary
I.A.2	Cultural resources documentation submitted to SHPO	180 days after signing	10/20/2014	Completed; provide updates as necessary
I.A.3	SHPO notifies USAG that information baseline has been created and request any missing information	1 year after completion of I.A.2	4/02/2015	Completed
I.A.4	USAG and SHPO consult to address any data discrepancies	180 days after completion of I.A.3	7/05/2016	Completed (HC #63877); consult as needed on any data discrepancies that may arise.
I.A.4	Implement agreeable terms to reconcile discrepancies	3 years after completion of I.A.4 task above	7/05/2016	Completed (HC #63877).
I.B	Complete documentation on needs data sites or implement a protection measure	3 years after signing	04/22/2017	<p>Completed</p> <p>FY16: Contract awarded in August 2015 for the re-evaluation of 89 sites contracted for re-evaluation in August 2015. Technical report and associated site documentation for 5LA10536 were submitted to the SHPO on May 10, 2017. Technical report and associated site documentation for the remaining 88 sites were submitted on November 21, 2017.</p> <p>FY17: Contract awarded in August 2016 for the re-evaluation of 18 sites contracted for re-evaluation in August 2016. Technical report and associated site documentation for site 5LA10858 were submitted to the SHPO on March 20, 2018. Technical report and associated site documentation for the remaining sites were submitted on April 25, 2018.</p> <p>FY18: No re-evaluations scheduled.</p>

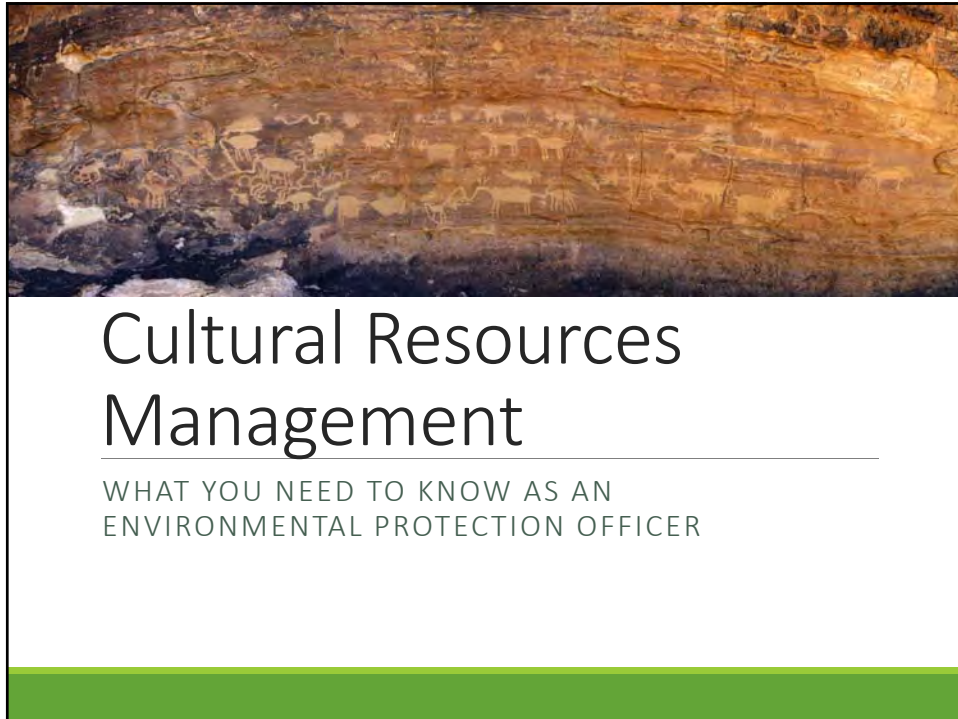
Stipulation	Action	Duration	Date Required	Remarks
				<p>FY19: Contract awarded in September 2018 to draft research designs for 71 needs data sites.</p> <p>There are approximately 555 remaining to be re-evaluated as funding becomes available. Protection strategy has been implemented at these sites.</p>
I.B.1	SHPO concurrence with NRHP eligibility determinations from re-evaluations	60 days after submission	TBD	<p>FY16: The SHPO concurred with our determination of eligibility for 5LA10536 via correspondence dated May 22, 2017 (HC #64252). The SHPO provided a response for the determinations of eligibility for the remaining sites in correspondence dated June 14, 2018 (HC #73224).</p> <p>FY17: The SHPO concurred with the determination of eligibility for 5LA10858 via correspondence dated April 9, 2018. The SHPO provided a response for the determinations of eligibility for the remaining sites via correspondence dated April 25, 2018.</p>
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 February 6-8, 2018, at PCMS. In attendance were representatives from the Comanche Nation, Eastern Shoshone Tribe, Jicarilla Apache Nation, Northern Arapaho Tribe, Northern Cheyenne Nation, Southern Ute Tribe, Ute Mountain Ute Tribe, and Ute Indian Tribe.</p>
III.A	Implement site protection measures		04/22/2017	<p>167 of 1,200 protected sites are completely enclosed by physical protection measures; 397 have corner markers or incomplete marking; 126 are terrain protected; all others are administratively protected.</p> <p>FY18: Boulders placed around select sites.</p> <p>FY19: Contract awarded to initiate marking of unmarked with numbered TAs and along canyon rims.</p>

Stipulation	Action	Duration	Date Required	Remarks
III.B	Propose amended site protection measures and monitoring frequencies	As needed	n/a	FY18: Contract awarded in September 2017 to update inspection/monitoring frequencies Appendix 2 updated as part of the amendment executed April 24, 2018. Additional updates to Appendix have been made as of October 31, 2018, and are included in Appendix 7.
III.D	Provided training vehicles/aircraft with means of knowing site locations	1 year after signing	04/22/2015	Completed
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections. FY19: Contract awarded in September 2018 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 on December 5, 2017, at Fort Carson. In attendance were representatives from the Colorado SHPO, Colorado Council of Professional Archaeologists, Otero County Commissioners, and Colorado Preservation, Inc.
VII.AG	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017

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ENCLOSURE 3:
ENVIRONMENTAL PROTECTION OFFICER (EPO) COURSE

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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

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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.

8/23/2017

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4

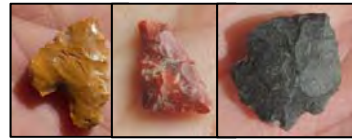
What are Cultural Resources?

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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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

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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.

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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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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

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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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14

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?

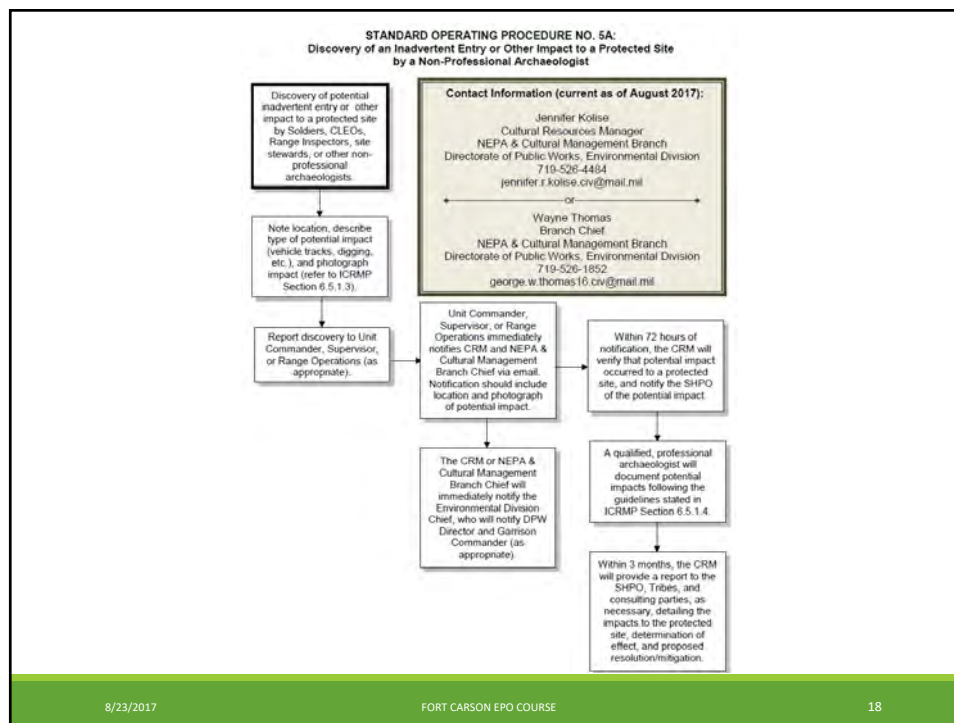
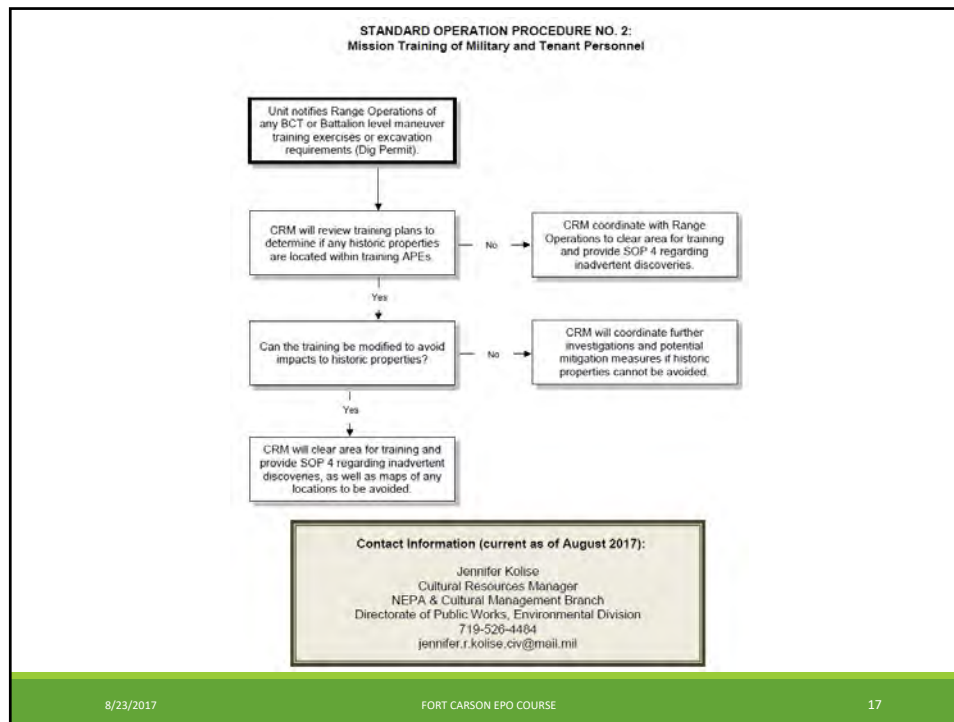
DO:

- 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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19

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

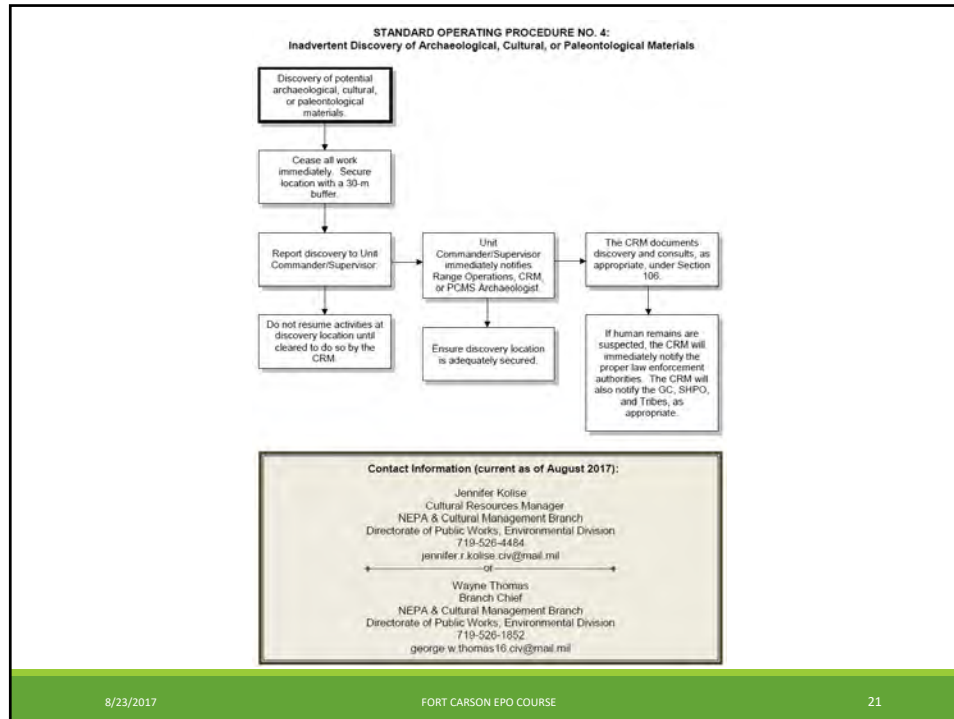
STOP WORK IMMEDIATELY

- 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.

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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?

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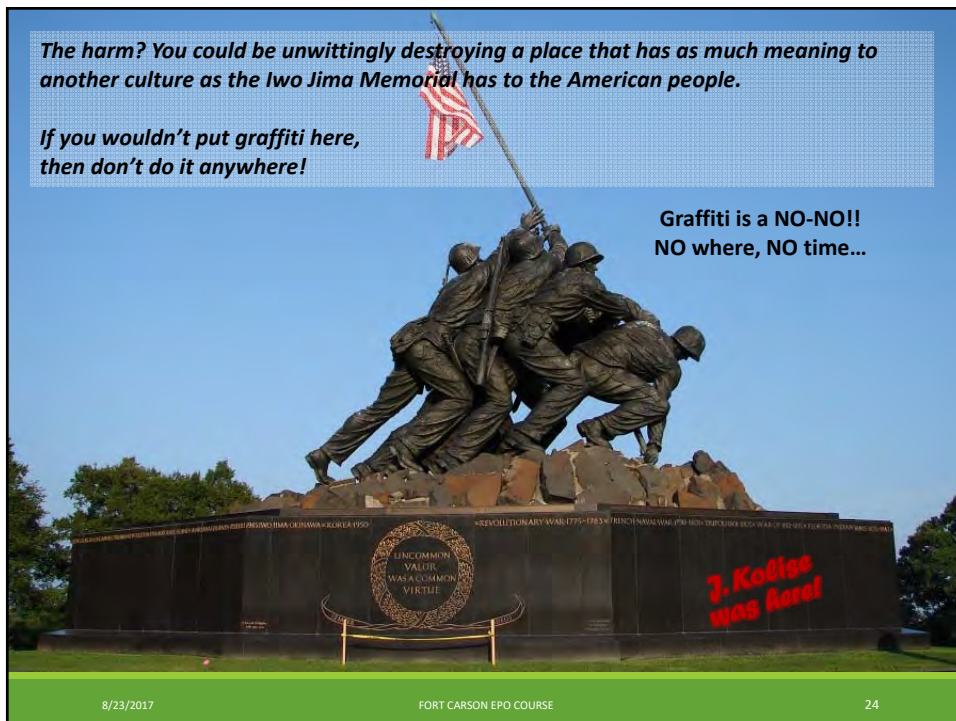
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23

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...**

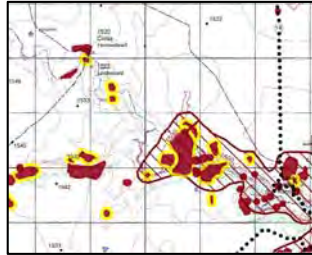


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24

Site Protection Measures



Protected Resources JCR Map

Red = unmarked restricted area
Red with yellow outline = marked restricted area
Red hash-marked area = dismounted 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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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?
 - www.carson.army.mil/DPW/nepa.html

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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)

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27

Question 1

True or False:

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

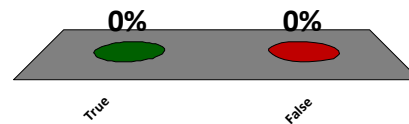
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28

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

- A. True
- B. False



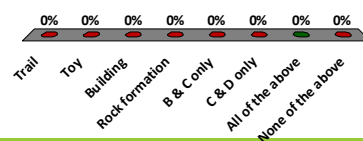
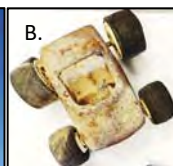
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29

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



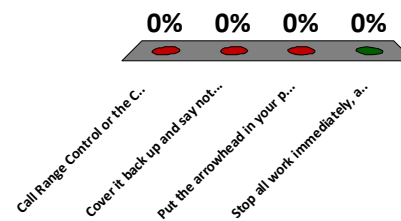
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30

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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31

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

- A. True
- B. False



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32

ENCLOSURE 4:
NOT 1 MORE ACRE!'S COMMENTS ON THE FY17 ANNUAL REPORT

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November 16, 2017

VIA U.S. MAIL AND EMAIL (jennifer.r.kolise.civ@mail.mil)

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

Re: Comments on PCMS FY 2017 Annual Cultural Resources Report

Dear Ms. Kolise:

On behalf of Not 1 More Acre! ("N1MA!") these comments are submitted on Army's Fiscal Year 2017 Annual Report required by the 2014 Programmatic Agreement ("2014 PA") pertaining to cultural resources at the Piñon Canyon Maneuver Site ("PCMS"). Public comments are explicitly invited by Stipulation VI.B of Army's 2014 Programmatic Agreement.

The FY17 annual report does a skillful job of creating the overall impression that Army is in compliance with its National Historic Preservation Act ("NHPA") obligations and actively consulting with interested parties and protecting cultural resources on the ground at PCMS.

The facts and experience at PCMS speak otherwise. What Army is good at, in short, is papering over glaring problems and shutting out those who question Army actions.

Actual protection of cultural resources is not meeting NHPA or 2014 PA standards, as exemplified most recently by the cultural resources After Action Report on the Raider Focus II exercise conducted during rain and snow in April and May 2017.

Under 36 C.F.R. §800.14(b)(2)(iv), the 2014 PA is subject to termination by the ACHP if its terms are not being carried out. Stipulation VII.E of the 2014 PA permits any signatory to the agreement to institute this process.

N1MA! believes that termination of the 2014 PA is the appropriate step at this point for the proper protection of cultural resources at PCMS.

As the FY17 Annual Report concedes, Army remains out of compliance with the NHPA stemming from unresolved violations of the 2014 PA in the 2010 Warhorse Rampage Training, the 2013 Warhorse Charge Training, and the 2015 Raider Focus Training Operation.

In 2017, multiple new violations arose from Operation Raider Focus II ("ORF II"). New violations are piling up faster than old ones are being resolved.

Army excuses have abounded and point to other violations of the 2014 PA, for example:

- *Violations allegedly occurred because soldiers using night-vision goggles can't see protective Seibert markers.

- *Violations allegedly occurred because new internet mapping systems are unavailable in most Humvees and are required to be turned off in defensive systems in war game simulations.

- *Violations allegedly occurred because soldiers mistakenly believe that only physically marked sites need to be avoided, etc.

Now Army is proposing amendments to the 2014 PA that would allow it to report fewer violations, but do nothing to improve on-the-ground protection for cultural resources. In fact, allowing the Army to conceal future violations is likely to lead to poorer performance in protecting cultural resources not better performance – even though the paperwork might look better.

"Needs Data" Sites Suddenly Allegedly 'Protected'

An example of how Army "papers over" 2014 PA violations is shown in the Annual Report's reference to "needs data" sites.

The 2014 PA at stipulation I.B requires that Army shall complete documentation of "needs data" resources -- if not identified for potential adverse effects or not protected by one of the protection measures identified in Stipulation III.A -- within 3 years of signing of the agreement. Army has calculated the deadline for this commitment as March 22, 2017.

The 2016 Annual Report at Enclosure 2 listed 532 "needs data" sites as unaddressed. The 2017 Annual Report claims this task was "[c]ompleted" with "protection measures implemented for all needs data sites" even though 468 "needs data" sites remain.

Whatever "protections" were allegedly afforded these sites, they were never made public for any sort of review if they exist at all. All available evidence through After Action Reports and Section 106 undertaking reports suggest that existing protections have been very sparsely applied, and even when undertaken, have not successfully prevented damage to cultural resource sites.

The sudden discovery of "protection" for these nearly 500 sites – protections never disclosed to the public -- is fictive accounting conducted by Army to allow unexamined assertions that it is in "compliance" with the PA.

In fact, what appears to be going on is that Army is continuing to lag in compliance with stipulation I.B's requirement that "needs data" sites be evaluated and is inventing some phantom "protections" to avoid reporting violations.

Invasive Species Treatments Suddenly All 'Exempt'

Another example of how Army appears to be papering over violations and shutting out agency critics is shown with respect to the Annual Report's discussion of invasive species treatment at PCMS.

Invasive species are a severe problem at PCMS due to Army's destruction of the native shortgrass ecology, which makes way for invasion of nonnative plants. This problem has only increased over time.

In late 2016, N1MA! filed objections to a Section 106 undertaking for invasive species treatment near protected cultural properties that proposed using highly toxic herbicides related to those that have caused serious problems at other locales. Army rejected N1MA!'s criticism and failed to provide responsive documents in answer to a Freedom of Information Act request that was filed nearly a year ago. Army does not appear to have any intent to ever provide these documents.

Now, the Annual Report shows all invasive species treatments conducted on PCMS in 2017 were allegedly "exempt undertakings." Given the vast number of protected sites on PCMS, and the circumstances present here, this assertion is, at a minimum, open to question.

Because Army does no site-specific environmental analysis on invasive species treatments under the National Environmental Policy Act ("NEPA"), which N1MA! asserts is a violation of NEPA, thereby inviting no public comment or rigorous analysis on environmental grounds, the absence of a Section 106 undertaking process means that no analysis – cultural or environmental – is done, no public disclosure is provided, and no public comment is taken or considered prior to a decision to use these treatments.

Over-expansive Exempted Undertaking Interpretations

Army uses "exempted undertakings" to "paper over" problems, shut out potential critics, and make excessively broad interpretations.

In 2017, N1MA! objected to Army exemptions claimed for a Range Ride event involving 125 horseback riders featuring protected cultural resources as "marquee attractions" conducted at a time Army was supposed to be performing after action reviews for a major, damaging training operation.

Army responded in writing, rejecting N1MA!'s comments, and the FY 2017 Annual Report implies that, because it did not send another letter, N1MA! was mollified by or accepting of this response.

N1MA! is not mollified by or accepting of this response. The 2014 PA specifically covers training and operational support activities. Promotional events using cultural resources as attractions are outside the scope of this agreement. A full Section 106 undertaking analysis should have been done.

Of course, no public comment or environmental analysis under NEPA was done for this event, either.

Missing Elements of Annual Report

The FY 2017 Annual Report also fails to contain certain items explicitly required to be included in the report by stipulation VI.A of the 2014 PA, which requires that "USAG shall report the following information or similar."

Included in that list but not included in the FY 2017 Annual Report are:

"9. Acknowledgement of, and mitigation strategies for, cumulative effects not previously identified."

And:

"7. Issues raised by an interested or concurring party in the reporting period."

Given that there have been repeat violations from, at the very least, brigade-level training exercises, Army clearly has some experience with cumulative effects by 2017. Further, the use of new technologies at PCMS – such as CAB, GPS, lasers, night-vision goggles, satellite and airborne guidance – strongly suggest that not all cumulative effects were known or could have been anticipated previously by Army.

Issues raised by interested parties are not disclosed or discussed in the Annual Report. The discussion of N1MA!'s concerns with respect to the Range Ride event at Table 2 never mentions what N1MA!'s concerns were.

Apparently Incorrect Claims of Compliance

Other claims of compliance in the FY17 Annual Report do not appear to be correct or are highly questionable.

For example, at Enclosure II, Army claims it has “completed” the task required by Stipulation III.D of the 2014 PA requiring it to provide training aircraft and vehicles with Global Positioning System technology as a means of knowing the locale of protected properties and to implement this by no later than a date Army calculated as April 22, 2015.

However, the recent AAR for the 2017 Raider Focus II training exercise concedes that many Humvees do not have the Blue Force Tracker system installed, and other vehicles that apparently do have the technology apparently turn it off when they are assigned to defensive forces during war training.

How is this task “completed”?

Also, Army claims compliance with Stipulation II.A requiring protective markings and measures at protected properties covering areas of both frequent interaction with Army training operations, and areas where terrain makes such interaction unlikely. The FY 2017 Annual Report, however, shows that more than 800 of the 1,260 protected properties on PCMS are only “administratively protected,” most of which are not marked on site, according to the 2014 PA.

As before, the paperwork looks OK, but performance on the ground, actual protection of cultural resources, is being disregarded.

N1MA! believes that termination of the 2014 PA is the appropriate step until Army becomes serious about NHPA compliance and begins to demonstrate on-the-ground protection of resources.

Cultural Resources Training Inadequate

The Annual Report also raises questions whether the Army is in compliance with Stipulation V.A requiring that it give “cultural resources awareness training for all personnel involved in the execution of undertakings within the APE on an annual basis.”

The FY17 Annual Report at Enclosure 2 claims that cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians and contractors” and attaches a Power Point from an Environmental Protection Officer course.

However, it is hardly clear from these vague assertions that “all personnel involved in the execution of undertakings” are really receiving training. Even if it can be assumed that the Annual Report refers to Fort Carson-stationed personnel and units who are perhaps most likely to be using PCMS, in fact, PCMS hosts personnel and units from all around the globe.

During the 2017 Raider Focus II training at PCMS, news media accounts stated that in addition to Fort Carson soldiers, additional personnel would be arriving from Fort Sill, Oklahoma, Fort Bragg, North Carolina, and Fort Hood, Texas.

Further, the Power Point training provided -- which tells environmental protection officers "what you need to know as an environmental protection officer" for personnel and units using PCMS -- does not notify even these specialized personnel of several points they clearly need to know to do their job. For example, the boundaries of specific unmarked administratively protected zones around PCMS, the fact that some protected sites are not physically marked, or the fact that Seibert markers cannot be seen through night vision goggles.

Given this, it should be no surprise that extensive and undisclosed damages occur with each training event.

What the Power Point shows is a perfunctory "check the box" type mentality toward cultural resources, where protecting cultural resources on the ground is not the purpose, but generating OK paperwork is.

This hardly complies with Stipulation V.A.

Sincerely,

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

Jean Aguerre for Not 1 More Acre!

cc: SHPO
ACHP



REPLY TO
ATTENTION OF

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

December 20, 2017

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

Dear Ms. Aguerre:

Thank you your correspondence dated November 16, 2017, regarding the fiscal year (FY) 2017 Annual Report for the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). The intention of this letter is to address your comments on the FY2017 Annual Report. Enclosure 1 includes the USAG Fort Carson's response to your comments. To ensure, all concerns have been adequately addressed, your specific comment has been cited in its entirety followed by our response. The USAG Fort Carson appreciates your organization's views on this matter, and has amended the 2017 Annual Report, as appropriate.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-503-6136; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Lessard", is written over the typed name.

James A. Lessard
Chief, Environmental Division

Enclosure

Enclosure 1: USAG Fort Carson's Response to Specific Comments from Not 1 More Acre! on the FY2017 Annual Report for the PCMS PA

The following are the USAG Fort Carson's responses to the concerns raised by Not 1 More Acre! (N1MA!) in correspondence dated November 16, 2017, regarding the fiscal year (FY) 2017 Annual Report for the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA).

N1MA!'s Comment #1: *Actual protection of cultural resources is not meeting NHPA or 2014 PA standards, as exemplified most recently by the cultural resources After Action Report on the Raider Focus II exercise conducted during rain and snow in April and May 2017.*

USAG Fort Carson's Response #1:

The intent of the National Historic Preservation Act (NHPA) is to charge federal agencies with responsible stewardship to include creation of historic preservation programs, designation of a historic preservation officer, development of a process for nominating properties to the National Register of Historic Places, and consideration of effects of its actions on historic properties, which USAG Fort Carson has done. As funding allows, we continue to proactively identify and evaluate cultural resources under Section 110 of the NHPA. The USAG Fort Carson continues to review its cultural resources best management practices to avoid, minimize or mitigate adverse effects on historic properties.

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

N1MA!'s Comment #2: *Under 36 C.F.R. §800.14(b)(2)(iv), the 2014 PA is subject to termination by the ACHP if its terms are not being carried out. Stipulation VII.E of the 2014 PA permits any signatory to the agreement to institute this process.*

N1MA! believes that termination of the 2014 is the appropriate step at this point for the proper protection of cultural resources at PCMS.

USAG Fort Carson's Response #2: We acknowledge your comment.

N1MA!'s Comment #3: *As the FY17 Annual Report concedes, Army remains out of compliance with the NHPA stemming from unresolved violations of the 2014 PA in the 2010 Warhorse Rampage Training, the 2013 Warhorse Charge Training, and the 2015 Raider Focus Training Operation.*

USAG Fort Carson's Response #3: The USAG Fort Carson is not out of compliance with the NHPA or the 2014 PA. Section 106 consultation is ongoing regarding effects to historic properties resulting from the training exercises in accordance with 36 CFR 800.6. The PCMS PA was not in effect when the 2010 and 2013 brigade-level training exercises occurred. Per Stipulation IV.B of the PA, the USAG Fort Carson completed its after action inspections of protected properties and reported results of these inspections to the SHPO, Native American Tribes, and other consulting and interested parties within the allotted 90 calendar days following the exercise for the 2015 training exercise.

N1MA!'s Comment #4: *In 2017, multiple new violations arose from Operation Raider Focus II ("ORF II"). New violations are piling up faster than old ones are being resolved.*

Army excuses have abounded and point to other violations of the 2014 PA, for example:

**Violations allegedly occurred because soldiers using night-vision goggles can't see protective Seibert markers.*

**Violations allegedly occurred because new internet mapping systems are unavailable in most Humvees and are required to be turned off in defensive systems in war game simulations.*

**Violations allegedly occurred because soldiers mistakenly believe that only physically marked sites need to be avoided, etc.*

Now, Army is proposing amendments to the 2014 PA that would allow it to report fewer violations, but do nothing to improve on-the-ground protection for cultural resources. In fact, allowing the Army to conceal future violations is likely to lead to poorer performance in protecting cultural resources not better performance – even though the paperwork might look better.

USAG Fort Carson's Response #4: Yes, as reported in the FY2017 Annual Report, as well as the After Action Report for the 2017 1st Stryker Brigade Combat Team (1SBCT) "Raider Focus" Training Exercise, 45 protected properties were entered during the most recent brigade-sized training exercise. It is very important to note that a site entry does not equate to an adverse effect to a historic property. At the PCMS, we have 1,271 protected properties, and despite the number of site entries during the past 4 brigade-sized training exercise, less than 1% of the total number of protected properties have had an adverse effect from military training. The FY2017 Annual Report also noted Section 106 consultation concerning the 2010, 2013, and 2015 brigade-sized training exercises is still ongoing. Regrettably, consultation to resolve adverse effects (if any) takes time and cannot usually be completed before the next large-scale exercise. Lessons learned after each exercise are used to make improvements in our protection strategies and methods for future training.

The proposed amendments to the PCMS do not allow the USAG Fort Carson to report fewer violations. If the proposed amendments are adopted, we will still be required to 1) within 72 hours of notification, report any entry or impact to a protected property to the SHPO, and 2) conduct after action inspections after each brigade-sized training exercise and publish the report of this inspection within 90 calendar days of the completion of the exercise. The proposed amendments do not change how or what historic properties are to be protected.

N1MA!'s Comment #5: *An example of how Army "papers over" 2014 PA violations is shown in the Annual Report's reference to "needs data" sites.*

The 2014 PA at stipulation I.B requires that Army shall complete documentation of "needs data" resources -- if not identified for potential adverse effects or not protected by one of the protection measures identified in Stipulation III.A -- within 3 years of signing of the agreement. Army has calculated the deadline for this commitment as March 22, 2017.

The 2016 Annual Report at Enclosure 2 listed 532 "needs data" sites as unaddressed. The 2017 Annual Report claims this task was "[c]ompleted" with "protection measures implemented for all needs data sites" even though 468 "needs data" sites remain.

Whatever "protections" were allegedly afforded these sites, they were never made public for any sort of review if they exist at all. All available evidence through After Action Reports and Section 106 undertaking reports suggest that existing protections have been very sparsely applied, and even when undertaken, have not successfully prevented damage to cultural resource sites.

The sudden discovery of "protection" for these nearly 500 sites -- protections never disclosed to the public -- is fictive accounting conducted by Army to allow unexamined assertions that it is in "compliance" with the PA.

In fact, what appears to be going on is that Army is continuing to lag in compliance with stipulation I.B's requirement that "needs data" sites be evaluated and is inventing some phantom "protections" to avoid reporting violations.

USAG Fort Carson's Response #5: Since 2014, the USAG Fort Carson has evaluated approximately 235 needs data sites, 129 of which have already received SHPO concurrence, 88 are currently being reviewed by the SHPO, and 18 are in the final document review stage internally. Needs data sites are administratively protected; some have physical protection measures in place as well. All needs data sites are included in our Geographic Information System (GIS) database, as well as the digital map for use in the Blue Force Tracker systems. Locational information is provided to proponents for needs data sites, in the appropriate format, prior to the initiation of an undertaking, including military training.

N1MA!'s Comment #6: *Another example of how Army appears to be papering over violations and shutting out agency critics is shown with respect to the Annual Report's discussion of invasive species treatment at PCMS.*

Invasive species are a severe problem at PCMS due to Army's destruction of the native shortgrass ecology, which makes way for invasion of nonnative plants. This problem has only increased over time.

In late 2016, N1MA! filed objections to a Section 106 undertaking for invasive species treatment near protected cultural properties that proposed using highly toxic herbicides related to those that have caused serious problems at other locales. Army rejected N1MA!'s criticism and failed to provide responsive documents in answer to a Freedom of Information Act request that was filed nearly a year ago. Army does not appear to have any intent to ever provide these documents.

Now, the Annual Report shows all invasive species treatments conducted on PCMS in 2017 were allegedly "exempt undertakings." Given the vast number of protected sites on PCMS, and the circumstances present here, this assertion is, at a minimum, open to question.

Because Army does no site-specific environmental analysis on invasive species treatments under the National Environmental Policy Act ("NEPA"), which N1MA! asserts is a violation of NEPA, thereby inviting no public comment or rigorous analysis on environmental grounds, the absence of a Section 106 undertaking process means that no analysis – cultural or environmental – is done, no public disclosure is provided, and no public comment is taken or considered prior to a decision to use these treatments.

USAG Fort Carson's Response #6: The suppression of invasive plant species is categorized as an exempted undertaking per the PCMS PA (see Appendix 1, Sections A.3b, B.4b2, C.3b2, and D.3b2), as long as the activity is not occurring within a historic property. Section 106 consultation was conducted for the FY16 project, since treatment methods were proposed to occur within historic properties. Through this consultation, it was agreed biocontrols could be used within the historic properties, but herbicides would not be used. The FY17 Invasive Species Treatment project areas were tailored to avoid historic properties, based on the outcome of the FY16 consultation; therefore, it did fit the requirement to be an exempted undertaking.

We previously notified you that your Freedom of Information Act request required coordination with another federal Agency.

We acknowledge your continued scientific disagreement concerning herbicides, but as we noted for you in very detailed previous correspondence, the USAG Fort Carson uses an integrated approach to control noxious weeds through a combination of prevention, cultural, physical, mechanical, chemical, and biocontrol methods. The use of pesticides (and herbicides) is but one component of our plan. More information on these measures can be found in the Installation's Natural Resources Management Plan

(INRMP) which is prepared in cooperation with and signed by the U.S. Fish and Wildlife Service and the Colorado Division of Parks and Wildlife. The INRMP has extensive public input as well as its own NEPA review. Additionally, the USAG Fort Carson has been in collaboration with the Colorado Department of Agriculture and several universities (Texas A & M, CSU, Montana State University, and Utah State) in researching biocontrol and plant material methods to control invasive species. The USAG Fort Carson only applies herbicides registered for use by both the Environmental Protection Agency (EPA) and the State of Colorado. All controlled herbicide products are only applied by properly licensed applicators in accordance with the manufacturer's labeled specifications. The USAG Fort Carson will continue to use only approved herbicide products that meet the desired invasive species control for the current environmental conditions.

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

N1MA's Comment #7: *Army uses "exempted undertakings" to "paper over" problems, shut out potential critics and make excessively broad interpretations.*

In 2017, N1MA! Objected to Army exemptions claimed for a Range Ride event involving 125 horseback riders featuring protected cultural resources as "marquee attractions" conducted at a time Army was supposed to be performing after action reviews for a major, damaging training operation.

Army responded in writing, rejecting N1MA!'s comments, and the FY 2017 Annual Report implies that, because it did not send another letter, N1MA! Was mollified by or accepting of this response.

N1MA! Is not mollified by or accepting of this response. The 2014 PA specifically covers training and operational support activities. Promotional events using cultural resources as attractions are outside the scope of this agreement. A full Section 106 undertaking analysis should have been done.

Of course, no public comment or environmental analysis under NEPA was done for this event, either.

USAG Fort Carson's Response #7: As explained in previous correspondence dated April 17, 2017, and May 19, 2017, recreational activities, such as the Pikes Peak Range Ride Event, are categorized as exempted undertakings under the PCMS PA (see Appendix 1, Sections B.4b3, C.3b3, and D.3b3), as long as the undertaking does not occur within a historic property. Section 106 consultation was completed for those portions of the event that did not qualify as an exempted undertaking, which included the visit to historic properties. The event organizers collaborated with the Cultural Resources Manager (CRM) on the proposed routes and activities for PCMS Range Ride. The CRM led the tour to the historic properties. No horses were allowed within the perimeter of any historic property. The SHPO concurred with our determination of effect via correspondence dated May 17, 2017 (HC #72126).

Your comments, as well as our response, in its entirety will be added to the FY17 Annual Report as an appendix.

The Range Ride Event did undergo environmental analysis under NEPA. Since the activity meets the screening criteria in accordance with 32 CFR 651.29, as well as the categorical exclusion category in Appendix B to Part 651, Section II(f)(1). Therefore, a REC was completed.

N1MAI's Comment #8: *The FY 2017 Annual Report also fails to contain certain items explicitly required to be included in the report by stipulation VI.A of the 2014 PA, which requires that "USAG shall report the following information or similar."*

Included in that list but not included in the FY 2017 Annual Report are:

"9. Acknowledgement of, and mitigation strategies for, cumulative effects not previously identified."

And:

"7. Issues raised by an interested or concurring party in the reporting period."

Given that there have been repeat violations from, at the very least, brigade-level training exercises, Army clearly has some experience with cumulative effects by 2017. Further, the use of new at PCMS – such as CAB, GPS, lasers, night-vision goggles, satellite and airborne guidance – strongly suggest that not all cumulative effects were known or could have been anticipated previously by Army.

Issues raised by interested parties are not disclosed or discussed in the Annual Report. The discussion of N1MAI's concerns with respect to the Range Ride event at Table 2 never mentions what N1MAI's concerns were.

USAG Fort Carson's Response #8: The PA requires reporting of issues regarding our execution of the PCMS PA, not issues raised during Section 106 consultation that takes place for matters outside the scope of the PA. As stated in the previous comment, your

comments, as well as our response, in its entirety will be added to the FY2017 Annual Report as an appendix. In addition, comments received from the Otero County Commissioners and our response regarding the Section 106 consultation to repair wind damage at historic properties will be included as an appendix.

In accordance with Stipulation VI.A.9, Sections D and I of the FY2017 Annual Report acknowledge potential effects, including cumulative effects, and Section 106 consultation is ongoing to address potential adverse effects, including adverse cumulative effects, and to develop mitigation strategies.

N1MA!'s Comment #9: *Other claims of compliance in the FY17 Annual Report do not appear to be correct or are highly questionable.*

For example, at Enclosure II, Army claims it has "completed" the task required by Stipulation III.D of the 2014 PA requiring it to provide training aircraft and vehicles with Global Positioning System technology as a means of knowing the locale of protected properties and to implement this by no later than a date Army calculated as April 22, 2015.

However, the recent AAR for the 2017 Raider Focus II training exercise concedes that many Humvees do not have the Blue Force Tracker system installed, and other vehicles that apparently do have the technology apparently turn it off when they are assigned to defensive forces during war training?

How is this task "completed"?

USAG Fort Carson's Response #9: In accordance with Stipulation III.D of the PCMS PA, the USAG Fort Carson has provided information regarding the locations of protected properties in an appropriate format for use in training aircraft and vehicles equipped with Global Positioning System (GPS) capabilities. Paper maps are made available for those vehicles not equipped with GPS.

N1MA!'s Comment #10: *Also, Army claims compliance with Stipulation II.A requiring protective markings and measures at protected properties covering areas of both frequent interaction with Army training operations, and areas where terrain makes such interaction unlikely. The FY 2017 Annual Report, however, shows that more than 800 of the 1,200 protected properties are only "administratively protected," most of which are not marked on site, according to the 2014 PA.*

As before, the paperwork looks OK, but performance on the ground, actual protection of cultural resources, is being disregarded.

N1MA! Believes that termination of the 2014 PA is the appropriate step until Army becomes serious about NHPA compliance and begins to demonstrate on-the-ground protection of resources.

USAG Fort Carson's Response #10: One of the protective measures provided under Stipulation II.A of the PCMS PA is administrative protective measures. Protected properties that fall within this category typically do not have physical protection measures in place. Of the 1,271 protected properties, only 439 are located within heavy maneuver areas, leaving 832 sites that are either inaccessible to vehicles or located in dismount only training areas.

N1MA!'s Comment #11: *The Annual Report also raises questions whether the Army is in compliance with Stipulation V.A requiring that it give "cultural resources awareness training for all personnel involved in the execution of undertakings within the APE on an annual basis."*

The FY17 Annual Report at Enclosure 2 claims that cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians and contractors" and attaches a Power Point from an Environmental Protection Officer course.

However, it is hardly clear from these vague assertions that "all personnel involved in the execution of undertakings" are really receiving training. Even if it can be assumed that the Annual Report refers to Fort Carson-stationed personnel and units who are perhaps most likely to be using PCMS, in fact, PCMS hosts personnel and units from all around the globe.

During the 2017 Raider Focus II training at PCMS, news media accounts stated that in addition to Fort Carson soldiers, additional personnel would be arriving from Fort Sill, Oklahoma, Fort Bragg, North Carolina, and Fort Hood, Texas.

Further, the Power Point training provided – which tells environmental protection officers "what you need to know as an environmental protection officer" for personnel and units using PCMS – does not notify even these specialized personnel of several points they clearly need to know to do their job. For example, the boundaries of specific unmarked administratively protected zones around PCMS, the fact that some protected sites are not physically marked, or the fact that Seibert markers cannot be seen through night vision goggles.

Given this, it should be no surprise that extensive and undisclosed damages occur with each training event.

What the Power Point shows is a perfunctory "check the box" type mentality toward cultural resources, where protecting cultural resources on the ground is not the purpose, but generating OK paperwork is.

This hardly complies with Stipulation V.A.

USAG Fort Carson's Response #11: Thank you for bringing our attention to the error in the 2017 Annual Report. Section III.B neglected to state (as is stated in the two other 2017 Annual Reports) that "Additional training materials, briefs, and presentations are

provided on an as-needed basis, and are typically specific to the situation.” This sentence has now been added to the 2017 Annual Report for the PCMS PA.

The PowerPoint presentation for the Environmental Protection Officer (EPO) Course is only one of several various trainings and briefings provided. It is tailored specifically for EPOs, and is meant to provide only a brief overview, as well as where they can find the appropriate tools to successfully complete their job (see Slide 26). Slide 25 covers site protection measures, to include how to read the symbols (red polygon = unmarked site; red polygon with yellow outline = marked site; white line through protected boundary = authorized passageway). This is verbally discussed in more detail during the class.

In addition to the EPO Course, general cultural resources awareness is provided by the Cultural Resources Awareness video (<http://www.carson.army.mil/DPW/nepa.html>) and the Environmental Battle Book (<http://www.carson.army.mil/DPW>). Additional training materials, briefs, and presentations are provided on an as-needed basis, and are tailored to the specific situation. For example, cultural resources awareness training is provided prior to large-scale exercises; this training includes information on the nature, importance, and location of marked and unmarked sites.

ENCLOSURE 5:
CONSULTING PARTIES' COMMENTS ON FIRST AMENDMENT TO THE PCMS PA

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COLORADO COUNCIL OF PROFESSIONAL ARCHAEOLOGISTS

To: Ms. Jennifer Kolise,
Cultural Resources Manager (CRM)
Department of the Army
Us Army Installation Management Command
Directorate of Public Works
1626 Evans Street, Bldg 1219
Fort Carson, Co 80913-4143

Date: November 28, 2017

CC: Mark Tobias, History Colorado
Jason La Belle, President, Colorado Council of Professional Archaeologists

RE: Review of *First Amendment to 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* and

First Amendment to 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 Pinon Canyon Maneuver Site, Fort Carson, Colorado

Dear Ms. Kolise

I apologize for the delay in submitting this. I had anticipated submitting before Thanksgiving but other things got in the way. The CCPA has reviewed the draft of the amendment to the Programmatic Agreement for Fort Carson that you sent by email on October 25 and has the following comments:

First Amendment to 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

The addition on page 2 of “WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army;” will more clearly define the responsibilities if the USAG and cover situations not expected or understood at the time of the writing. This whereas should make clear all of the actions that require Section 106 compliance.

On page 4 in the first bullet item, line 6, need a comma after “Reservation” and “Utah, to be consistent with how such designations are presented in the rest of the bullet Item

Stipulation II, Exempted Undertakings, B: Air Assets, what are “aviation assets”? If you mean airplanes, why would they need to be restricted to roads through protected properties if they are flying overhead? Or are you referring to low-flying craft that could potentially stir up dust that could potentially erode a site. Or is dust disturbance not a concern? Another concern should be visual and noise intrusions from aircraft that probably cannot be restricted to existing, prescribed access roads through Protected Properties. This stipulation should be clarified.

If training requirements specify that aircraft operations must occur during periods of very low visibility or at night what measures are in place to ensure that air assets can adequately identify the prescribed routes and stay within the prescribed route boundaries through Protected Properties?

Stipulation IV. A: Need to specify professional qualifications for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties.

Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.

Review of: *First Amendment to 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 Pinon Canyon Maneuver Site, Fort Carson, Colorado*

The inclusion of “WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army; and” again will more clearly define the responsibilities of the USAG and cover situations not expected or understood at the time of the writing. This whereas should make clear all of the actions that require Section 106 compliance

Stipulation IV. A: Is there a place in the PA and its appendices where the qualifications for monitors and inspectors is spelled out? If the qualifications are in the ICRMP then it should say so in the PA somewhere for the benefit of those reading the documents.

Stipulation VII. C. the revised wording is well considered based on experience and practice gained during the first years of the PA and clearly needed.

Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.

Appendix 1. A.3.(c): firewood programs? Commercial sales or private use? Is it safe to assume that the areas have been thoroughly inventoried and there are no culturally modified trees in the area? Will any culturally modified trees be clearly marked for avoidance if they exist?

Appendix 1. D., Paragraph 1, line 4: "... this area *are* ..."? The grammar is terrible it should be either "**these areas are**" or "*this area is*" to avoid any possibility of confusion.

Appendix 3. 1.1 Need to specify qualifications of a "professional archaeologist" for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties 1.1.3.: Is it understood that the inspectors have reviewed previous documentation of a site before visiting the site to be inspected? Also, will an archaeologist accompany a Conservation Law Enforcement Officers (CLEOs), Range Inspectors, or site stewards? If not, will they be required to undergo training and, if so, what?

Appendix 3, 1.1.4: Paragraph 2, lines 1&2: is this usage of within 72 hours of incursion event occurring assuming that the inspectors and/or monitors are certified trackers certified as either Joel Hardin professional Tracker or Universal Tracking s Services certified trackers who might be more skilled in making a determination of a 72 hour period, assuming that any authorized activities could be inspected up to 90 days after the event? Otherwise it seems an open question as to how the inspector or monitor is able to determine that the detected event occurred within the specified 72-hour interval.

General comment: The documentation specified in Appendix G for documenting impacts to sites seems to be thought-out and adequate to the task and outcomes desired,

The CCPA thanks you for the opportunity to comment on the draft. If you have any questions or wish to discuss, I am available.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kimball M. Banks', written in a cursive style.

Kimball M. Banks, PhD
Director of Strategic Development
Metcalf Archaeological Consultants, Inc.
651 Corporate Circle, Suite 200
Golden CO 80401

Phone: 303.425.4507
kbanks@metcalfarchaeology.com

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REPLY TO
ATTENTION OF

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

December 13, 2017

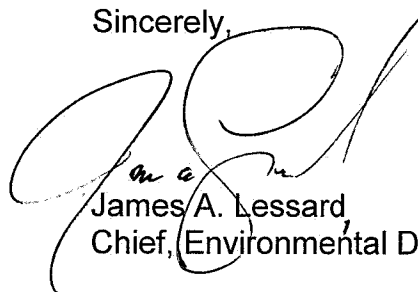
Dr. Kimball Banks, Fort Carson CCPA Liaison
Metcalf Archaeological Consultants, Inc.
651 Corporate Circle, Suite 200
Golden, Colorado 80401

Dear Dr. Banks:

Thank you your correspondence dated November 28, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities Down Range Fort Carson, Colorado* (Fort Carson Downrange PA), and *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). The intention of this letter is to address your comments on the proposed amendments. Enclosure 1 includes the USAG Fort Carson's response to your comments. To ensure, all concerns have been adequately addressed, your specific comment has been cited in its entirety followed by our response. The USAG Fort Carson appreciates your organization's views on this matter.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-503-6136; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,


James A. Lessard,
Chief, Environmental Division

Enclosure

Enclosure 1: USAG Fort Carson's Response to Specific Comments from the Colorado Council of Professional Archaeologists on the Proposed Amendments to the Fort Carson Downrange and PCMS PAs

The following are the USAG Fort Carson's responses to the concerns raised by the Colorado Council of Professional Archaeologists (CCPA) in correspondence dated November 28, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities Down Range Fort Carson, Colorado* (Fort Carson Downrange PA), and *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA).

Fort Carson Downrange PA-Specific Comments

CCPA's Comment #1: *The addition on page 2 of "WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army;" will more clearly define the responsibilities if the USAG and cover situations not expected or understood at the time of the writing. This whereas should make clear all of the actions that require Section 106 compliance.*

USAG Fort Carson's Response #1: The Whereas clause has been edited to state: **"WHEREAS**, this Agreement applies to all undertakings, as defined in 36 CFR 800.16(y), within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the USAG; and..."

CCPA's Comment #2: *On page 4 in the first bullet item, line 5, need a comma after "Reservation" and "Utah, to be consistent with how such designations are presented in the rest of the bullet item*

USAG Fort Carson's Response #2: Thank You. A comma has been inserted between "Reservation" and "Utah" for consistency. The clause in the PCMS PA has also been updated accordingly.

CCPA's Comment #3: *Stipulation II, Exempted Undertakings, B: Air Assets, what are "aviation assets"? If you mean airplanes, why would they need to be restricted to roads through protected properties if they are flying overhead? Or are you referring to low-flying craft that could potentially stir up dust that could potentially erode a site. Or is dust disturbance not a concern? Another concern should be visual and noise intrusions from aircraft that probably cannot be restricted to existing, prescribed access roads through Protected Properties. This stipulation should be clarified.*

If training requirements specify that aircraft operations must occur during periods of very low visibility or at night what measures are in place to ensure that air assets can

adequately identify the prescribed routes and stay within the prescribed route boundaries through Protected Properties.

USAG Fort Carson's Response #3: The intent of the exception is in reference to vehicles, not the aviation assets. For clarification purposes, Stipulation II.B now reads "During the implementation of an exempted undertaking vehicles (except for travel on an existing road that may traverse a site) and aviation assets are not permitted within the perimeter of protected properties listed in Appendix 2." Stipulation II.B in the PCMS PA has been updated accordingly.

Aviation assets include rotary aircraft and small fixed-wing aircraft, such as unmanned aerial systems. Fort Carson Regulation 95-1 has provisions for minimum altitude and distance from various objects, including protected resources.

Since the exception for travel on existing roads is not applicable to the aviation assets, your questions regarding their travel along these authorized corridors through protected properties will not be addressed further.

CCPA's Comment #4: *Stipulation IV.A: Need to specify professional qualifications for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties.*

USAG Fort Carson's Response #4: Stipulation IV.A references the reader to Appendix 5, which does state who can conduct inspections versus monitoring. The qualifications are discussed in the Integrated Cultural Resources Management Plan (ICRMP). The appropriate section of the ICRMP is now referenced in the Appendix 5.

CCPA's Comment #5: *Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.*

USAG Fort Carson's Response #5: Appendix 1 has not been changed as part of the proposed amendments to the Fort Carson Downrange PA. The USAG Fort Carson has completed its inventory of the Downrange PA's area of potential effects (APE) in accordance with Stipulation I.B. The remaining acreage is exempt from survey as agreed upon in Stipulation VI and Appendix 4. Figure 4 depicts the Inventory Status of Fort Carson (current as of November 2017). Appendix 2 lists all known protected properties within the APE covered by the PA. Locations of protected properties are provided to the proponent of an undertaking, as appropriate.

PCMS PA-Specific Comments

CCPA's Comment #1: *The inclusion of "WHEREAS, this Agreement applies to all undertakings within the APE that are under direct or indirect jurisdiction of the USAG, including undertakings performed by licensees, lessees, permittees, and tenant units, which are coordinated and approved by the Army: and" again will more clearly define the responsibilities if the USAG and cover situations not expected or understood at the time of writing. This whereas should make clear all the actions that require Section 106 compliance.*

USAG Fort Carson's Response #1: Please see our response to Comment #1 on the Fort Carson Downrange PA amendments.

CCPA's Comment #2: *Stipulation IV.A: Is there a place in the PA and its appendices where the qualifications for monitors and inspectors is spelled out? If the qualifications are in the ICRMP then it should say so in the PA somewhere for the benefit of those reading the documents.*

USAG Fort Carson's Response #2: Stipulation IV.A references the reader to Appendix 3, which does state who can conduct inspections versus monitoring. The qualifications are discussed in the ICRMP. The appropriate section of the ICRMP is now referenced in the Appendix 3.

CCPA's Comment #3: *Stipulation VII.C. the revised wording is well considered based on experience and practice gained during the first years of the PA and clearly needed.*

USAG Fort Carson's Response #3: Thank you for your comment.

CCPA's Comment #4: *Appendix 1. Have the areas where these activities will take place been inventoried and historic properties identified? If so, that should be referenced.*

USAG Fort Carson's Response #4: Approximately 93% of the Piñon Canyon Maneuver Site (PCMS) has been inventoried. The remaining 7% is located within the canyon areas and interior fence boundary. In accordance with Stipulation I.C, additional survey is not required unless it is necessary for the execution of an undertaking that has not been identified as exempted in Appendix 1. Figure 3 depicts the areas that have not been inventoried on the PCMS (current as of November 2017). All known protected properties are listed in Appendix 2. Locations of protected properties are provided to the proponent of an undertaking, as appropriate.

CCPA's Comment #5: *Appendix 1.A.3.(c): firewood programs? Commercial sales or private use? Is it safe to assume that the areas have been thoroughly inventories and there are no culturally modified trees in the area? Will any culturally modified trees be clearly marked for avoidance if they exist?*

USAG Fort Carson's Response #5: The language within Appendix 1.A.3(c) has not been changed as part of the proposed amendments to the PCMS.

The Fort Carson Firewood Program is for personal use only. An area would be identified and marked by the Fort Carson Forester from which firewood could be collected. The Fort Carson Forester coordinates with the Fort Carson Cultural Resources Manager and others programs when determining from which areas firewood can be gathered. If culturally-modified trees did exist on the PCMS, they would be clearly marked as off limits.

CCPA's Comment #6: *Appendix 1.D., Paragraph 1, line 4: "...this area are..."? The grammar is terrible it should be either "**these areas are**" or "this area is" to avoid any possibility of confusion.*

USAG Fort Carson's Response #6: Thank you. The wording has been changed to state: "This area is..."

CCPA's Comment #7: *Appendix 3. 1.1 Need to specify qualifications of a "professional archaeologist" for monitoring and other activities in the PA. If the qualifications are in the ICRMP then the PA should reflect that to protect all parties 1.1.3: Is it understood that the inspectors have reviewed previous documentation of a site before visiting the site to be inspected? Also, will an archaeologist accompany a Conservation Law Enforcement Officers (CLEOs), Range Inspectors, or site stewards? If not, will they be required to undergo training and, if so, what?*

USAG Fort Carson's Response #7: The intent of routine inspections is to determine the effectiveness of protection measures, looking to see if anyone has driven into the site, dug in the site, bivouacked in the site, etc. As such, a qualified, professional archaeologist is not needed to conduct these inspections. If an inspector notes an entry or other impact, then a Secretary of the Interior (SOI)-qualified, professional archaeologist will oversee the documentation and assessment of the impact.

Conservation Law Enforcement Officers are trained to conduct site inspections. Range Inspectors are trained in documenting and assessing maneuver damage. Therefore, both are more than qualified to determine if a site has been impacted during military training or other human activities. Site stewards are volunteers who will undergo training by Fort Carson Cultural Resources Program staff to inspect sites. These volunteers will likely be members of the Colorado Archaeological Society or similar organization.

CCPA's Comment #8: *Appendix 3, 1.1.4: Paragraph 2, lines 1&2: is this usage of within 72 hours of incursion event occurring assuming that the inspectors and/or monitors are certified trackers certified as either Joel Hardin professional Tracker or Universal Tracking s Services certified trackers who might be more skilled in making a determination of a 72 hour period, assuming that any authorized activities could be inspected up to 90 days after the event? Otherwise it seems an open question as to*

how the inspector or monitor is able to determine that the detected event occurred within the specified 72-hour interval.

USAG Fort Carson's Response #8: Based on your comment, we realize the statement is not as clear as we had intended concerning the 72-hour window. To clarify, within 72 hours of being notified of the entry or other impact, the Cultural Resources Manager must notify the Colorado State Historic Preservation Officer. The wording has been changed to state: "Per Stipulation IV.C of the PCMS PA, the CRM must notify the Colorado State Historic Preservation Officer (SHPO) within 72 hours of being informed about any vehicle entry or other impact that may have occurred." Appendix 5, Section 1.1.4 of the Fort Carson Downrange PA has been updated accordingly.

CCPA's Comment #9: *General comment: The documentation specified in Appendix G for documenting impacts to sites seems to be thought-out and adequate to the task and outcomes desired.*

USAG Fort Carson's Response #9: Thank you for your comment.



Keith Goodwin - Commissioner Dist. 1
Kevin Karney - Commissioner Dist. 2
Jim Baldwin - Commissioner Dist. 3
Michael L. Nicklos - County Attorney
Jean Hinkle - County Administrator

Office of the Commissioners

November 27, 2017

Department of the Army
DPW Environmental Division
ATTN: Jennifer Kolise, Acting Cultural Resources Manager
1626 Evans Street, BLDG 1219
Fort Carson, Colorado 80913-4143

RE: Comments and Recommendations Related to the First Amendment to the Programmatic Agreement for Military Training and Operational Support Activities at the PCMS

Dear Ms. Kolise:

The Otero County Board of Commissioners in consultation with the Otero County Historic Preservation Board has reviewed the proposed amendments to the Military Training and Operational Programmatic Agreement (PA) the PCMS. The United States Army Garrison (USAG) at Fort Carson has stated that the proposed amendment is necessary to align the PA with the 2017-2021 Integrated Cultural Resources Management Plan (INCRMP). The following are our comments, concerns and recommendations related to the proposed changes to the PA.

The Military Training and Operational Support PA for the PCMS was negotiated and took effect on 25 April 2014. The purpose of this PA was to provide a format to streamline Section 106 consultation under the National Historic Preservation Act for activities at the PCMS.

One of the under-lying premises behind the establishment of a PA is that the federal agency has a record of meeting their obligations under the NHPA and has demonstrated the ability to protect the cultural resources under their jurisdiction. Fort Carson/PCMS has not demonstrated that they have met those requirements in the past, or will be able in the future. Significant numbers of cultural resources under the protection of USAG have been breached during every one of the brigade level training operation at the PCMS in the past decade. In fact, during training earlier this year a new record for the number of sites breached was achieved.

Because of these ongoing and consistent issues, we are concerned about USAG's commitment and ability to meeting their obligations under the National Historic Preservation Act. Before any amendments to the PA are approved, we believe that discussions between USAG, the SHPO, ACHP and consulting parties should be initiated to address specific mitigation for the individual and cumulative adverse effects to sites from military training at the PCMS.

The proposed amendment includes several general changes related to terminology and aligning the PA with the INCRMP. We understand the purpose of insuring consistency among all documents related to the cultural resources at the PCMS. We do however have the following general and specific questions and concerns related to the proposed amended PA.

The FY 2017 Annual Report states that in addition to Section 106 consultation for impacts during the FY 2017 "Radar Focus" training, Section 106 consultation continues related to "Raider Focus" training exercises held in May-June, 2015 when 36 sites were impacted. Consultation continues on two previous brigade-sized training exercises: the 2010 2-4 BCT "Warhorse Rampage" and the 2013 2-4 BCT "Warhorse Charge" training. An additional site which was entered during the 2015 Brigade training was not discovered and reported until 2017.

The fact that Brigade training exercises in 2010, 2013, 2015 and 2017 have all resulted in significant numbers of site breaches, combined with the fact that consultation for the first three exercises continues while additional issues occur, clearly demonstrates that the cultural resources at the PCMS are in a perpetual state of ongoing adverse effects.

Until such time as Section 106 consultation for the 2010 – 2015 training exercises is completed, and mitigation agreed to, we do not believe that USAG has met the terms and requirements of this PA or the NHPA; and should be required to conduct full Section 106 on all Brigade training exercises.

Page 1, paragraph 4 – The original PA stated, and the proposed amendment follows USAG's determination of the Area of Potential Effect (APE) as being "all lands within the exterior boundary of the PCMS..." As we have stated in the past, we disagree with USAG's determination of the APE. An APE is defined as the area or areas within which an undertaking may directly or **indirectly** cause alterations in the character or use of historic properties. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."

Many operational activities, as well as training exercises, have the potential to create adverse effect to cultural resources outside the boundaries of the PCMS. Aviation training at the PCMS regularly includes over-flight of surrounding lands, including the Purgatoire River canyon and side canyons. These activities introduce potential sound and vibrations impacts to historic resources; and increases in structures and lighting within the cantonment impact the viewshed and night sky which are significant features of the Santa Fe Trail which lies directly across Highway 350 from the Cantonment.

In paragraph 1, page 2 of the amended PA it is stated "USAG recognizes that cumulative adverse effects may accrue on historic properties within the APE, from military training and other repetitive undertakings." Yet, through their establishment of a narrowly defined APE, the

Army is ignoring direct, indirect and cumulative impacts to cultural resources on lands surrounding the PCMS.

We request that clearly defined steps be identified and undertaken to address adverse and cumulative effects to historic resources on adjoining lands since aviation training extending outside the APE is not an exempted activity.

Page 1, paragraph 5 – The Army has added this paragraph stating that the PA will apply to all undertakings within the APE, including those performed by licensees, lessees, permittees and tenant units. The Army must recognize that a federal agency cannot assign their responsibility under the NHPA to a third party. If this paragraph is to be accepted as part of the amendment to the PA, what will be the Army's procedures for monitoring and assuring consulting parties that any third-party meets all requirements under the PA and the NHPA; and what reporting and repercussions will be required if a third party does not meet those requirements?

Page 2, paragraph 3 – When the PA was signed in 2014 the Army stated that 20,912 acres of the APE required survey and that 4,203 acres of that were to be completed that year. We request an update from USAG as to whether that goal was achieved and how much has been surveyed in each subsequent year.

We also request information documenting whether USAG has met all stipulations related to inventory and evaluation of cultural resources to the satisfaction of the SHPO.

Page 8 and Appendix 3, 1.1 – Under the terms of the original PA, monitoring and both routine and after-action inspections of historic properties were required to be conducted by a subject matter expert. Under the proposed amendment, the requirement for monitoring to be conducted by a professional with specific expertise would be eliminated, and Appendix 3 states that inspections of protected properties can be completed by Conservation Law Enforcement Officers, Range Inspectors, or site stewards in addition to professional archaeologists.

We understand that Range Inspectors have received basic training on site inspections and after actions impacts. We encourage USAG to continue training for these personnel, and to track the effectiveness of this practice. At no time should monitoring or after actions inspections be conducted by Army personnel.

We have concerns about archaeologists conducting monitoring activities or inspections on historic structures. The NHPA sets standards for professionals working in preservation related fields, and History Colorado and the State Historical Fund expect those working in preservation related fields to meet those qualifications. An architectural historian would not be considered qualified to conduct archaeological activities, and archaeologists are not trained in architecture, historic construction techniques or in appropriate stabilization, protection or rehabilitation of historic structures.

In addition, the Army's demolition by neglect of the historic homesteads and ranches at the PCMS clearly demonstrate a lack of understanding and commitment to these important resources.

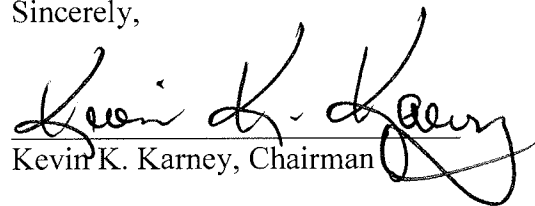
Both the FY 2016 and 2017 Annual PA Reports state that windmills, historic ranch structures and homestead sites had been impacted by wind. The lack of basic maintenance and stabilization (insuring roofs are adequate and secured; securing or covering of doors and windows, etc.) is a contributing factor to potential weather-related impacts. Regular and on-going repairs/maintenance/stabilization of the built-resources at the PCMS is part of the operational responsibilities of USAG under the NHPA. We request that conversations be initiated between USAG, the SHPO and consulting parties to address the failure of USAG to protect and preserve these resources.

Appendix 2 – The Army states that there are no historic/protected properties in the cantonment. Has further documentation and analysis been conducted, by a professional trained in historic architecture, to substantiate changing site 5LA05693 from “needs data” to a formal determination of “not eligible”?


Changes to Appendix 2 also include elimination of the legends defining Field Evaluations and Determinations of Eligibility. Are we correct in assuming that the new format for charts describing resources will still state whether a site determination is “field” or “official”?

Please contact our office if you have further questions or concerns.

Sincerely,



Kevin K. Karney, Chairman



Keith Goodwin

Cc: Mark Tobias, Section 106 Compliance Officer, State Historic Preservation Office
Katherine Kerr, Program Analyst for Army Undertakings Advisory Council for
Historic Preservation



REPLY TO
ATTENTION OF

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

December 15, 2017

Ms. Jean Hinkle, County Administrator
Otero County Commissioners
13 West 3rd Street, Room 212
La Junta, Colorado 81050

Dear Ms. Hinkle:

Thank you your correspondence dated November 27, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). The intention of this letter is to address the Commissioner's comments on the proposed amendments. Enclosure 1 includes the USAG Fort Carson's response to your comments. To ensure, all concerns have been adequately addressed, your specific comment has been cited in its entirety followed by our response. The USAG Fort Carson appreciates your organization's views on this matter.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-503-6136; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Lessard", is written over a large, stylized, handwritten "X" or "Z" mark.

James A. Lessard
Chief, Environmental Division

Enclosure

Enclosure 1: USAG Fort Carson's Response to Specific Comments from the Otero County Commissioners on the Proposed Amendments to the PCMS PA

The following are the USAG Fort Carson's responses to the concerns raised by the Otero County Commissioners in correspondence dated November 27, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA).

Otero County Commissioners' Comment #1: *One of the under-lying premises behind the establishment of a PA is that the federal agency has a record of meeting their obligations under the NHPA and has demonstrated the ability to protect the cultural resources under their jurisdiction. Fort Carson/PCMS has not demonstrated that they have met those requirements in the past, or will be able in the future. Significant numbers of cultural resources under the protection of USAG have been breached during every one of the brigade level training operation at the PCMS in the past decade. In fact, during training earlier this year a new record for the number of sites breached was achieved.*

Because of these ongoing and consistent issues, we are concerned about USAG's commitment and ability to meeting their obligations under the National Historic Preservation Act. Before any amendments to the PA are approved, we believe that discussions between USAG, the SHPO, ACHP and consulting parties should be initiated to address specific mitigation for the individual and cumulative adverse effects to sites from military training at the PCMS.

USAG Fort Carson's Response #1: USAG Fort Carson acknowledges that our efforts to protect historic properties at the Piñon Canyon Maneuver Site (PCMS) will not eliminate the potential for adverse effects. With the recent data rectification between the USAG Fort Carson and the SHPO and the implementation of our site monitoring program, we are now armed with the proper information to initiate consultation on the mitigation of historic properties at the PCMS.

The intent of the National Historic Preservation Act (NHPA) is to charge federal agencies with responsible stewardship to include creation of historic preservation programs, designation of a historic preservation officer, development of a process for nominating properties to the National Register of Historic Places, and consideration of effects of its actions on historic properties, which USAG Fort Carson has done. As funding allows, we continue to proactively identify and evaluate cultural resources under Section 110 of the NHPA.

The USAG Fort Carson continues to review its cultural resources best management practices to avoid, minimize or mitigate adverse effects on historic properties. Since the execution of the PCMS PA, we have developed and implemented our site monitoring program, completing baseline monitoring/current conditions assessments at over 560 protected properties to date. Prior to the PCMS PA and the site monitoring program,

the Fort Carson Conservation Law Enforcement Officers were inspecting over 30 select sites at least twice a year at the PCMS, and still do. These officers have been trained to conduct site investigations.

Since the 2010 2-4 Brigade Combat Team's (BCT) "Warhorse Rampage" Training Exercise, the USAG Fort Carson has made improvements to cultural resources protections, such as physically marking sites, creating a digital map of restricted areas for use in the Blue Force Tracker systems in tactical vehicles, increasing cultural resources awareness, and implementing a robust site monitoring program.

After each brigade-sized training exercise (even before execution of the PCMS PA), after action inspections of protected properties within the area of potential effects (APE) are inspected for vehicle entries or other impacts related to the exercise, impacts are noted, the effects to historic properties are assessed, and Section 106 consultation regarding these effects is conducted. Lessons learned after each exercise are used to make improvements in our protection strategies and methods.

Protected properties have been entered or otherwise impacted during training exercises in 2010, 2013, 2015, and 2017, 12 of which have had adverse effects as a direct result of the training exercise or from cumulative effects from military training.

As stated in the FY2017 Annual Report for the PCMS PA, Section 106 consultation to resolve for potential adverse effects resulting from the 2010, 2013, 2015, and 2017 training exercises is underway. Once determinations of effect and proposed mitigation has been agreed upon, the USAG Fort Carson will enter into a Memorandum of Agreement with the Colorado State Historic Preservation Officer (SHPO) and Advisory Council on Historic Properties (ACHP). This consultation should not delay the execution of any proper and necessary amendment to the PCMS PA.

Otero County Commissioners' Comment #2: *The FY 2017 Annual Report states that in addition to Section 106 consultation for impacts during the FY 2017 "Rader [sic] Focus" training, Section 106 consultation continues related to "Raider Focus" training exercises held in May-June 2015 when 36 sites were impacted. Consultation continues on two previous brigade-sized training exercises: the 2010 2-4 BCT "Warhorse Rampage" and the 2013 2-4 BCT "Warhorse Charge" training. An additional site which was entered during the 2015 Brigade training was not discovered and reported until 2017.*

The fact that Brigade training exercises in 2010, 2013, 2015, and 2017 have all resulted in significant numbers of site breaches, combined with the fact that consultation for the first three exercises continues while additional issues occur, clearly demonstrates that the cultural resources at the PCMS are in a perpetual state of ongoing adverse effects.

Until such time as Section 106 consultation for the 2010-2015 training exercises is completed, and mitigation agreed to, we do not believe that USAG has met the terms

and requirements of this PA or the NHPA; and should be required to conduct full Section 106 on all Brigade training exercises.

USAG Fort Carson's Response #2: The 2015 1SBCT "Raider Focus" Training Exercise resulted in 62 entries, not 36 as stated in your comment. We have received concurrence with our determination of effects for 23 of the entered properties. Consultation is ongoing regarding our determination of effects for 39 sites.

It is very important to note that a site entry does not equate to an adverse effect to a historic property. We agree that the number of site entries is capable of being further reduced. However, we do not agree that the site entries have resulted in a perpetual state of ongoing adverse effects. At the PCMS, we have 1,271 protected properties, and despite the number of site entries during the past 4 brigade-sized training exercise, less than 1% of the total number of protected properties have had an adverse effect from military training.

The Section 106 consultation for the 2010, 2013, 2015, and 2017 training exercises is a separate subject from the PCMS PA. Although we have not concluded our Section 106 consultation for the past brigade-sized training exercises, this does not mean the USAG Fort Carson is not compliant with the terms of our PA or NHPA.

Otero County Commissioners' Comment #3: Page 1, paragraph 4 – *The original PA state, and the proposed amendment follows USAG's determination of the Area of Potential Effect (APE) as being "all lands within the exterior boundary of the PCMS..." As we have stated in the past, we disagree with USAG's determination of the APE. An APE is defined as the area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties. The APE is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking."*

Many operational activities, as well as training exercises, have the potential to create adverse effects to cultural resources outside the boundaries of the PCMS. Aviation training at the PCMS regularly includes over-flight of surrounding lands, including the Purgatoire River canyon and side canyons. These activities introduce potential sound and vibrations impacts to historic resources; and increases in structures and lighting within the cantonment impact the viewshed and night sky which are significant features of the Santa Fe Trail which lies directly across from Highway 350 from the Cantonment.

In paragraph 1, page 2 of the amended PA it is stated "USAG recognizes that cumulative adverse effects may accrue on historic properties within the APE, from military training and other repetitive undertakings." Yet, through their establishment of a narrowly defined APE, the Army is ignoring direct, indirect and cumulative impacts to cultural resources on lands surrounding the PCMS.

We request that clearly defined steps be identified and undertaken to address adverse and cumulative effects to historic resources on adjoining lands since aviation training extending outside the APE is not an exempted activity.

USAG Fort Carson's Response #3: Thank you for your comment. This matter was raised and thoroughly considered during the public comment period for the development of the PA. The APE has been determined in consultation with the SHPO and the ACHP. The proposed amendments to the PA does not change the agreed upon APE.

The USAG Fort Carson stated its position with regards to the Santa Fe National Historic Trail in correspondence to the Otero County Commissioners dated 24 October 2013. While the USAG Fort Carson appreciates the overall historic significance of the Santa Fe National Historic Trail, the route segment along the western boundary of the PCMS is not a "historic property" as defined by 36 CFR 800.16(l)(1), nor is it a National Historic Landmark as defined by 36 CFR 800.16(p). Thus, further consideration of adverse effects to this portion of the trail under Section 106 of the NHPA is not warranted.

Per the PCMS PA, the construction of structures that are more than 2 stories or more than 40 feet in height is not categorized as an exempted undertaking, and therefore, the USAG Fort Carson must follow the Section 106 consultation process in accordance with 36 CFR 800.3 through 800.7.

Otero County Commissioners' Comment #4: Page 1, paragraph 5 – *The Army has added this paragraph stating that the PA will apply to all undertakings within the APE, including those performed by licensees, lessees, permittees and tenant units. The Army must recognize that a federal agency cannot assign their responsibility under the NHPA to a third party. If this paragraph is to be accepted as part of the amendment to the PA, what will be the Army's procedures for monitoring and assuring consulting parties that any third-party meets all requirements under the PA and the NHPA; and what reporting and repercussions will be required if a third party does not meet those requirements?*

USAG Fort Carson's Response #4: We agree with your core concern. This clause is not intended to assign our Section 106 responsibility to a third party. The clause clarifies our position that any undertaking that has been proposed by licensees, lessees, permittees, and tenants units that has undergone coordination, review, and approval by the USAG Fort Carson can be exempted under the PCMS PA.

Otero County Commissioners' Comment #5: Page 2, paragraph 3 – *When the PA was signed in 2014 the Army stated that 20,912 acres of the APE required survey and that 4,203 acres of that were to be completed that year. We request an update from USAG as to whether that goal was achieved and how much has been surveyed in each subsequent year.*

USAG Fort Carson's Response #5: The cultural resources inventory of approximately 4,203 acres at the PCMS has been completed; and the associated technical report and

site documentation were submitted to the SHPO in February 2016. The SHPO concurred with the majority of the determinations of eligibility via correspondence dated August 11, 2016 (HC #70277). The USAG Fort Carson will address the SHPO's comments on sites for which we did not receive concurrence. Sites lacking concurrence are treated as protected properties until the issues have been resolved. Figure 3 of the amendment has been updated to reflect the completion of the 2014 survey.

As stated in Section F of the FY2017 Annual Report for the PCMS PA, a wildland fire burned approximately 29 acres of land within Training Area F (Red Rock Canyon). The fieldwork portion of a 40-acre survey of the wildland fire footprint and adjacent areas was completed on November 21, 2017. Four cultural resources were identified. Analysis is still ongoing. The associated technical report and site documentation should be finished in FY2018.

Stipulation I.C states "No additional survey is required within the APE unless necessary to execute an undertaking not identified as exempted in Appendix 1." There have been no proposed, non-exempt undertakings within unsurveyed areas; therefore, no additional surveys have been required.

Otero County Commissioners' Comment #6: *We also request information documenting whether USAG has met all stipulations related to inventory and evaluation of cultural resources to the satisfaction of the SHPO.*

USAG Fort Carson's Response #6: As stated in Enclosure 2 of the FY2016 and FY2017 Annual Reports for the PCMS PA, the data reconciliation required under Stipulation I.A has been completed. The SHPO acknowledged its completion via correspondence dated March 16, 2016 (HC #63877).

Since the implementation of the PCMS PA, the USAG Fort Carson has evaluated 235 needs data sites, 107 of which are awaiting review by the SHPO. Needs data sites are administratively protected; some have physical protection measures in place as well. All needs data sites are included in our Geographic Information System (GIS) database, as well as the digital map for use in the Blue Force Tracker systems. Locational information is provided to proponents, in the appropriate format, prior to the initiation of an undertaking, including military training. Therefore, as required by Stipulation I.B, all needs data sites have either been evaluated or protected by one of the protection measures identified in Stipulation III.A.

As previously stated, the USAG Fort Carson just completed a 40-acre survey of the Dixie Wildland Fire footprint and adjacent areas; the technical report and site documentation should be completed in FY2018. Otherwise, there have been no proposed, non-exempt undertakings within unsurveyed areas; therefore, no additional surveys have been required per Stipulation I.C.

As documented in Appendix 2 of the FY2017 Annual Report and prior fiscal years' annual reports, the USAG Fort Carson consults with culturally-affiliated, federally-

recognized Native American Tribes on an annual basis regarding our management of properties of traditional, religious, and cultural importance to the Tribes. Tribal consultation also occurs on an as-needed basis outside of the annual meeting.

Completion of tasks under Stipulation I (Inventory and Evaluation of Cultural Resources) are tracked in Appendix 2 of the Annual Report. To date, the SHPO has not disagreed with the status of completion for the tasks.

Otero County Commissioners' Comment #6: Page 8 and Appendix 3, 1.1 – *Under the terms of the original PA, monitoring and both routine and after-action inspections of historic properties were required to be conducted by a subject matter expert. Under the proposed amendment, the requirement for monitoring to be conducted by a professional with specific expertise would be eliminated, and Appendix 3 states that inspections of protected properties can be completed by Conservation Law Enforcement Officers, Range Inspectors, or site stewards in addition to professional archaeologists.*

We understand that Range Inspectors have received basic training on site inspections and after actions impacts. We encourage USAG to continue training for these personnel, and to track the effectiveness of this practice. At no time should monitoring or after actions inspections be conducted by Army personnel.

USAG Fort Carson's Response #6: Under the proposed amendments, long-term monitoring to assess site condition would be overseen by a Secretary of the Interior (SOI)-qualified archaeologist, while routine inspections to assess the effectiveness of protection measures will be done by subject matter experts, such as Conservation Law Enforcement Officers, Range Inspectors, or site stewards. If impacts are noted during a routine inspection, then a SOI-qualified archaeologist would be required to evaluate the impact.

Conservation Law Enforcement Officers are also trained to conduct site inspections and ARPA investigations. Site stewards are volunteers trained to conduct routine inspections; these volunteers would most likely be members of the Colorado Archaeological Society or similar organization.

As long as they have been trained to identify potential intrusions into a protected property, we see no reason why Army personnel, which includes military and the civilian workforce, could not conduct inspections.

Otero County Commissioners' Comment #7: *We have concerns about archaeologists conducting monitoring activities or inspections on historic structures. The NHPA sets standards for professionals working preservation related fields, and History Colorado and the State Historical Fund expect those working in preservation related fields to meet those qualifications. An architectural historian would not be considered qualified to conduct archaeological activities, and archaeologists are not trained in architecture, historic construction techniques or in appropriate stabilization, protection or rehabilitation of historic structures.*

In addition, the Army's demolition by neglect of the historic homesteads and ranches at the PCMS clearly demonstrate a lack of understanding and commitment to these important resources.

Both the FY2016 and 2017 Annual PA Reports state that windmills, historic ranch structures and homestead sites had been impacted by wind. The lack of basic maintenance and stabilization (insuring roofs are adequate and secured; securing or covering of doors and windows, etc.) is a contributing factor to potential weather-related impacts. Regular and on-going repairs/maintenance/stabilization of the built-resources at the PCMS is part of the operational responsibilities of USAG under NHPA. We request that conversations be initiated between the USAG, the SHPO and consulting parties to address the failure of USAG to protect and preserve these resources.

USAG Fort Carson's Response #7: Your concerns have been noted regarding archaeologists conducting monitoring activities or inspections on historic structures.

Where necessary and appropriate, professionals meeting the SOI qualifications for architectural historian and/or historic architect have been, and will continue to be, utilized. Due to the cost and impracticality of stabilization or restoration, the Army contracted the National Park Service in 1989 to conduct Historic American Building Survey (HABS) documentation as mitigation for the deterioration of structures, occurring prior to acquisition, at the following resources: Big Canyon/Crowder Ranch (HABS #CO-89), Brown's Sheep Camp (HABS #CO-90), Bar VI Ranch (HABS #CO-92), Cross Ranch (HABS #CO-93), Moses B. Stevens Homestead (HABS #CO-94), and Mary Doyle Homestead (HABS #CO-95). In addition to the HABS documentation, the USAG Fort Carson has also conducted Office of Archaeology and Historic Preservation (OAHP) Level I and Level II Historic Resource Documentation of the homesteads and ranch complexes with historic buildings and structures. Professionals meeting the SOI qualifications for architectural historian and/or historic architect conducted these projects. The USAG Fort Carson has also informally discussed a PCMS Ranches PA with the SHPO and consulting parties. Formal consultation for the PCMS Ranches PA is anticipated to start in FY2019.

A stabilization project was completed at Brown's Sheep Camp in 2011. Section 106 consultation was conducted on the project. The contract was awarded to DWG & Associates, who has experience in the restoration and repair of historic buildings and structures. The original residence, the two-story barn, the commissary, the bunkhouse, the garage, and the one-story barn received new roof systems. A sub-structure was built on the inside of the original residence, the two-story barn, the commissary, and the bunkhouse to support the weight of the new roof system and minimize the further deterioration of the historic sod brick walls and gables. All window and door openings in the six buildings were also sealed as part of this stabilization effort.

Basic maintenance, to include mowing around the structures, is conducted at Big Canyon/Crowder Ranch, Biernacki Ranch, Brown's Sheep Camp, Sharp's Ranch, and

Red Rocks Ranch. After a high wind event that occurred at the PCMS on March 6, 2017, maintenance personnel inspected the facilities at these aforementioned ranches to check for any damage. Wind damage was noted at Brown's Sheep Camp, Big Canyon/Crowder Ranch, and Biernacki Ranch. The Fort Carson Cultural Resources Manager was immediately informed, and a work order request and Section 106 consultation was initiated to repair these damages. The repairs to these buildings have been completed.

Otero County Commissioners' Comment #8: *Appendix 2 – The Army states that there are no historic/protected properties in the cantonment. Has further documentation and analysis been conducted, by a professional trained in historic architecture, to substantiate changing site 5LA05693 from “needs data” to a formal determination of “not eligible”?*

USAG Fort Carson's Response #8: Site 5LA5693 is the location of the school that served the rural Simpson community during the early 20th century. The site was first identified in 1983 by archaeologists from the University of Denver (DU). At this time, the site consisted of an 8-meter by 8-meter foundation constructed from shaped limestone blocks with cement mortar, a slight depression (possible cistern), a very light trash scatter, and a cluster of mill-cut boards. There was no standing architecture on the site. This resource is an archaeological site, not a historical architectural resource (e.g. building, structure, object, etc.). In 1983, the DU archaeologists described the site as moderately to heavily disturbed. Although they believed the site had low potential to contain significant data, it was recommended to have a historical archaeologist evaluate the site. The DU archaeologists noted surveyor stakes crossing the site and hypothesized the Army may have been planning to construct a road across the site.

The site was revisited and evaluated in 2014 by the PCMS Archaeologist, who meets the SOL's qualifications for archaeology. She has experience in both prehistoric and historic archaeology. The site was relocated approximately 150 meters northeast of its originally reported location. The site dimensions were changed from 21 meters by 47 meters to 74 meters by 132 meters. The cluster of milled lumber was relocated. Evidence of the structural foundation (shaped limestone blocks, brick, mortar, window glass, milled lumber, asphalt shingle fragments, etc) was observed in the drainage berm along Main Supply Route (MSR 1). Based on this, the structural foundation and probable cistern were destroyed by the construction/widening of MSR 1 and its drainage ditch. Based on archival research and the artifact assemblage, site 5LA5693 was surmised to be the rural Simpson school. The site does not retain integrity; therefore, it has been determined to be ineligible for inclusion in the National Register of Historic Places. The SHPO concurred with our determination of eligibility via correspondence dated September 8, 2014 (CHS #65835).

Otero County Commissioners' Comment #9: *Changes to Appendix 2 also include elimination of the legends defining Field Evaluations and Determinations of Eligibility. Are we correct in assuming that the new format for charts describing resources will still state whether a site determination is “field” or “official”?*

USAG Fort Carson's Response #9: The "Determination of Eligibility" column refers to a site's official eligibility status for inclusion in the National Register of Historic Places, meaning the SHPO has concurred with the USAG Fort Carson's determination of eligibility.

November 27, 2017

VIA U.S. MAIL AND EMAIL (jennifer.r.kolise.civ@mail.mil)

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

**Re: Comments on Proposed Amendments to 2014 Programmatic
Agreement For Protection of Cultural Resources on Piñon
Canyon Maneuver Site, Colorado**

Dear Ms. Kolise:

On behalf of Not 1 More Acre! ("N1MA"), these comments are submitted regarding Army's proposed amendments to the 2014 Programmatic Agreement ("2014 PA") pertaining to protection of cultural resources on Piñon Canyon Maneuver Site ("PCMS"), Colorado.

The proposed amendments were received by N1MA attached to an October 25 email. N1MA has not received the comments from the State Historic Preservation Office ("SHPO") and the Advisory Council on Historic Preservation ("ACHP") discussed in the email. Please forward them to us.

I. Summary: Drop Amendments, Terminate PA, Prepare an EA

N1MA objects to the proposed amendments. The amendments appear to be attempts to conceal future violations of the 2014 PA by making "definitional" changes and by reducing monitoring requirements. This would allow Army to ignore some violations by "defining them away" in After Action Reports and Annual Reports and to fail to find other violations by decreasing binding monitoring commitments where violations would otherwise be discovered and reported. What these amendments would do is essentially improve the look of Army's paperwork *but* decrease actual protections for cultural resources on the ground in violation of the law.

Army remains in violation of the National Historic Preservation Act ("NHPA") due to continuing and ongoing violations that never seem to be resolved and are continuing to pile up at a rate that essentially means Army will never be in compliance. Rather than amending the 2014 PA to allow broader cover-ups of future violations, as Army proposes, the PA should be terminated pursuant to its terms since it is not being

effectively carried out, and Army should return to pre-undertaking reviews required by Section 106 of the NHPA.

Proceeding with the proposed amendments requires an Environmental Assessment ("EA") to be prepared under the National Environmental Policy Act ("NEPA") because allowing cover-ups of future violations could have significant impacts on the environment, threatening a continuance of, and likely increase of, cultural resource protection violations and thus significant new actual damage to, and potential loss of, protected cultural resources. N1MA hereby demands that an EA be prepared without further delay.

II. As Violations Pile up, the PA Should be Terminated

Army's proposed amendments to the 2014 PA appear to proceed on the assumption that its performance merits giving Army greater flexibility in handling its duties under the 2014 PA. Nothing could be further from the truth.

In fact, what Army's past performance demonstrates is ongoing and continuing violations of the 2014 PA, including new violations piling up faster than the old ones are resolved, resulting in a never-ending state of noncompliance.

Many of the violations are very basic and reflect a reckless disregard of Army's cultural resources obligations.

For example, just this past April, Army conducted massive Stryker, Humvee, and other military operations through protected cultural sites in snowy and rainy spring weather, reportedly intruding upon 45 sites. Violations were reported in areas where military activities were restricted.

Army lags behind deadline in studying cultural sites that need further documentation.

Army fails to train soldiers, environmental protection officers, and relevant agencies of the need to be alert for, and avoid, unmarked sites, which constitute most of the protected sites on PCMS.

Not enough sites are marked. Those that are marked don't have sufficient markings. Not enough sites are provided with protections that prevent intrusion.

After Action Reports pretend that "indirect" effects of military operations using soldiers, contractors, and weapons systems from all around the country don't exist.

The list goes on and on.

These ongoing violations are not surprising given that Army's express policy is to ensure minimum compliance with the NHPA and other cultural laws so it can maintain "the largest possible area for military training." Fort Carson Reg. 200-1 §9-1(a).

What is needed here is not amendment providing flexibility for Army, but termination of the 2014 Programmatic Agreement, thereby forcing Army to comply with Section 106 of the NHPA under regular procedures to ensure these ongoing violations are, in the future, foreseen, and prevented.

III. An Environmental Assessment is Required

Army needs to prepare an Environmental Assessment prior to proceeding with amendments of the 2014 PA, and N1MA hereby demands that such action be taken.

First, there is no emergency demanding amendment of the 2014 PA, nor is adoption of an amendment to the programmatic agreement exempt by law from NEPA compliance. 32 C.F.R. §651.11(a), (b).

Second, there is no categorical exclusion applicable under 32 C.F.R. §651.11(c), because sensitive cultural resources would be adversely affected, 32 C.F.R. §651.29(c) and because deleting binding interagency commitments for the protection of cultural resources is not among the activities listed in 32 C.F.R. §651, Part B, §II(d). Furthermore, the proposed amendments involve substantive change in protection measures for cultural resources. 32 C.F.R. §651, Part B, §II(b).

Under Army regulations, 32 C.F.R. §651.11(c), when proposed Army actions involve neither categorical exclusions, emergencies nor categories exempted by law, such actions:

“...must be analyzed to determine if they could cause significant impacts to the human or natural environment (see §651.39). The EA determines whether possible impacts are significant, thereby warranting an EIS. This requires a ‘hard look’ at the magnitude of potential impacts, evaluation of their significance, and documentation in the form of either an NOI to prepare an EIS or a FNSI.... The EA is a valuable planning tool to discuss and document environmental impacts, alternatives, and controversial actions, providing public and agency participation, and identifying mitigation measures.” (emphasis supplied).

Army’s October 25, 2017, email containing notification of these proposed amendments contains no discussion of NEPA requirements nor notice of scoping or development of plans to prepare an EA. Army pretends that the changes in question are merely “administrative” as if this were perhaps some sort of excuse.

It is not. The changes proposed affect actual on-the-ground activities and threaten future damage to cultural resources and the environment.

Proceeding further without proper environmental analysis, public input and public disclosure would be a gross violation of NEPA.

IV. New Exemption for ‘Authorized Passageways’ Should be Rejected.

Army proposes to change Section II.B. of the 2014 PA prohibiting vehicle intrusions to protected cultural sites to create an ambiguous new exception for “authorized passageways.” This proposed amendment is wholly unwarranted. It is more properly understood as a vast “loophole” allowing Army to explain away, and deny, future likely intrusions on protected cultural sites.

As it exists, the paragraph already allows an exception for travel on “existing roads.” In Army’s overly broad interpretation already, this is stretched to include old “two track” remnants that really are not “roads.”

Extending this even further to exclude “authorized passageways” – undefined, or apparently definable any way Army wants – essentially turns the whole prohibition on its head, and instead *would allow any vehicle intrusions on protected property* without violation simply based on an unmonitored or unverifiable Army say so.

This language change -- “authorized passageways” -- should be firmly rejected. During the 2017 Operation Raider Focus II, 45 vehicle intrusions were admitted on the 200 protected cultural sites inspected. Many sites within the Area of Potential Effects (“APE”) were not properly inspected after the fact so the extent of damage is likely larger.

What the new language would do is simply allow Army, in the future, to “define away” intrusions as having occurred on “authorized passageways” known only to Army, thereby reporting *zero* violations despite multiple actual on-the-ground intrusions.

Army has committed to comply with the 2014 PA. It should be held to account for that.

V. Monitoring Reductions Should be Rejected

Army proposes a series of changes to Stipulation IV and adds language in Appendices 2 and 3 that will result in a dramatically decreased frequency in monitoring by qualified cultural resource personnel of sites most affected by military activities. Army attempts to justify this change by substituting more lenient language it unilaterally adopted in its 2017 Integrated Cultural Resources Management Plan (“ICRMP”) for language agreed to with the other parties in the 2014 PA.

None of this has any merit. No degree of reduction in monitoring is warranted in light of the past and ongoing history of violations of the 2014 PA by Army. Further, the 2014 PA was attached to the 2017 ICRMP and contains explicit terms indicating Army is bound to comply with the programmatic agreement. Thus, it was understood at the time the ICRMP was adopted that terms of the 2014 PA were binding on Army.

Even if there were any discrepancy between the 2014 PA and the ICRMP terms, Army is bound to comply with *both*. Fort Carson Reg. 200-1 §§ 9-1(b), 9-4(e). That is, if the

2014 PA calls for more frequent and intense monitoring than the ICRMP, Army cannot rely on the lax schedule it adopted in the ICRMP to avoid its commitments in the 2014 PA.

Further, the obvious purpose of this change is not as Army cynically suggests it is to conform the language of the ICRMP and the 2014 PA, but rather to do so in a way that reduces monitoring by qualified personnel, and thus reduces discovery and reports of violations, and thus produces “better” paperwork. An amendment that incentivizes such tactics is likely to actually cause more on-the-ground impacts even while allowing Army to report fewer violations.

Just by way of example, the 2014 PA at Stipulation IV calls for high frequency monitoring, defined as no less than every year, and performed by a subject matter expert, for areas subject to potentially more serious effects of military activities. Under the proposed amendment, many of these monitoring events will be required after only three or five years, and may be performed by non-expert personnel. Thus, the procedural change will have the necessary effect of making it appear there are fewer effects of military activities on cultural resources, and producing lower quality documentation of such effects, where they do occur.

This is a drastic and unwarranted change, not an “administrative” and “conforming” change. It should be soundly rejected.

VI. Other Problems

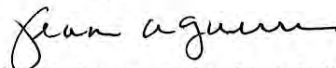
Other changes that deserve firm rejection:

- 1) Army also proposes changes to Section IV.D and VII.C of the 2014 PA that would allow it to change the “protected status” of particular properties and the inspection frequencies without needing to obtain approval of the other parties to the 2014 PA. This is merely another way for Army to “define away” lack of compliance with the PA in its sole discretion. There is no merit to it. If, for example, Army fails to meet monitoring deadlines in the 2014 PA, this proposed change would allow Army to merely deny a violation by instantaneously and unilaterally changing the inspection frequencies required.
- 2) Army proposes to exempt routine maintenance and repair outside of historic properties not only from advance Section 106 consultation under the NHPA, but also from even reporting these undertakings occurred in Army’s cultural resources annual report. 2014 PA §VI.A.2. This proposal does not save Army much in terms of time and resources, but it does give Army a vague new loophole under which advance Section 106 consultations need not occur, and Army never has to even reveal that violations may have occurred based on its definitional interpretation. This is unwarranted. Language that allows effective policing of Army’s recalcitrant compliance with NHPA is very appropriate and should not be deleted.

- 3) The added "Whereas" clause at page 1 of the proposed amendments specifying that Army take responsibility for the activity of licensees "coordinated and approved by Army" should not be so limited. Army tightly controls access to PCMS. Any activities of licensees on PCMS are effectively approved by Army and thus Army is responsible for NHPA compliance of those activities.
- 4) The proposed change at Appendix 1.A.2.d of the 2014 PA should not exempt removal of historic infrastructure and equipment, such as windmills, waterworks, etc.

The bottom line is this: The proposed amendments should be rejected. Allowing Army to avoid reporting new violations based on "definitional change" and decreased monitoring is an idea with little merit. In light of the continuing and increasing violations at Piñon Canyon Maneuver Site, termination of the 2014 PA, not amendment of it, is the appropriate step. Any amendment, additionally, must be accompanied by an appropriate Environmental Assessment including public disclosure, public input and environmental analysis before it is adopted.

Sincerely,



Jean Aguerre for Not 1 More Acre!

cc: SHPO
ACHP



REPLY TO
ATTENTION OF

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

December 20, 2017

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

Dear Ms. Aguerre:

Thank you your correspondence dated November 27, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). The intention of this letter is to address your comments on these amendments. Enclosure 1 includes the USAG Fort Carson's response to your comments. To ensure, all concerns have been adequately addressed, your specific comment has been cited in its entirety followed by our response. The USAG Fort Carson appreciates your organization's views on this matter.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-503-6136; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Lessard", is written over a large, stylized, looped signature that also appears to read "James A. Lessard".

James A. Lessard
Chief, Environmental Division

Enclosure

Enclosure 1: USAG Fort Carson's Response to Specific Comments from Not 1 More Acre! on the Proposed Amendments to the PCMS PA

The following are the USAG Fort Carson's responses to the concerns raised by Not 1 More Acre! (N1MA!) in correspondence dated November 27, 2017, regarding the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA).

N1MA!'s Comment #1: *The proposed amendments were received by N1MA attached to an October 25 email. N1MA has not received the comments from the State Historic Preservation Office ("SHPO") and the Advisory Council on Historic Preservation ("ACHP") discussed in the email. Please forward them to us.*

USAG Fort Carson's Response #1: There are no written comments from the SHPO at this time. Any comments made by the SHPO in the further development of the proposed amendment will be made available to the public. The USAG Fort Carson met with and informally sought the advice and opinion of representatives of the Colorado State Historic Preservation Officer (SHPO) and Advisory Council on Historic Preservation (ACHP), which helped shape our current proposed amendments. The draft final proposed amendments were submitted to the SHPO and ACHP on November 15, 2017. All comments will be made available to the public.

N1MA!'s Comment #2: *N1MA objects to the proposed amendments. The amendments appear to be attempts to conceal future violations of the 2014 PA by making "definitional" changes and by reducing monitoring requirements. This would allow Army to ignore some violations by "defining them away" in After Action Reports and Annual Reports and to fail to find other violations by decreasing binding monitoring commitments where violations would otherwise be discovered and reported. What these amendments would do is essentially improve the look of the Army's paperwork but decrease actual protections for cultural resources on the ground in violation of the law.*

USAG Fort Carson's Response #2: Your comment is noted. We disagree that the proposed amendments would reduce monitoring requirements or otherwise erode protections in place. The amendments more clearly describe the purpose, intent, and methods of the monitoring program, which is: 1) to determine effectiveness of protection measures through routine inspections on a cyclic basis, and 2) to assess site condition through long-term monitoring on a cyclic basis. The original language of the PA focused on impacts associated with military training and evaluated protection measures from that perspective. The proposed amendment adds the element of identifying change to the overall site condition from natural and human-related impacts through long-term monitoring visits, while noting military or other human-related impacts through inspection. Ultimately, this combination of inspections and long-term monitoring will assist the Cultural Resources Manager to assess direct, indirect, and cumulative effects in context. Armed with this data, the USAG Fort Carson will be able to make better

informed decisions regarding determinations of effects to historic properties and overall management of cultural resources at the PCMS.

The variety of methods used for protection measures for protected properties has not changed through the proposed amendment process. Any changes to the protection method used at a particular site must receive concurrence from the Colorado State Historic Preservation Officer (SHPO). Please see Stipulations III.B and VII.C.

N1MAI's Comment #3: *Army remains in violation of the National Historic Preservation Act ("NHPA") due to continuing and ongoing violations that never seem to be resolved and are continuing to pile up at a rate that essentially means Army will never be in compliance. Rather than amending the 2014 PA to allow broader cover-ups of future violations, as Army proposes, the PA should be terminated pursuant to its terms since it is not being effectively carried out, and Army should return to pre-undertaking reviews required by Section 106 of the NHPA.*

USAG Fort Carson's Response #3: The National Historic Preservation Act (NHPA) was enacted to acknowledge the importance of protecting our nation's significant cultural resources from the extensive federal development that was occurring. The NHPA charges federal agencies with responsible stewardship to include creation of historic preservation programs, designation of a historic preservation officer, development of a process for nominating properties to the National Register of Historic Places, and consideration of effects of its actions on historic properties, with which the USAG Fort Carson is compliant. Entries or other impacts to protected properties does not equate to non-compliance with the NHPA or the PA. These entries or other impacts are reported as required in the PA, as well as by 36 CFR 800.13, and consultation, as appropriate is conducted.

The USAG Fort Carson has completed the data rectification process as directed in Stipulation I.A. We have continued to evaluate needs data sites, submitting the documentation as it is completed to the SHPO, in accordance with Stipulation I.B. For those needs data sites that have not undergone a re-evaluation, protection measures as identified in Stipulation III.A have been established for these resources. Survey of the PCMS is conducted as necessary per Stipulation I.C. The USAG Fort Carson consults on an annual basis with culturally-affiliated, federally-recognized Native American Tribes, as well as on a case-by-case basis, as stipulated in I.D.

In accordance with Stipulation II, the Fort Carson Cultural Resources Manager reviews undertakings, and applies the applicable exemptions. If the undertaking is not considered exempted under the PA, then Section 106 consultation is conducted in accordance with 36 CFR 800.3 through 800.7.

The USAG Fort Carson has implemented protection measures and a monitoring program to determine the effectiveness of those protection measures in accordance with Stipulations II and III of the PCMS PA. Per Stipulation IV.B, inspections of protected properties occur after each brigade exercise, and the After Action Report is

provided to the SHPO, Native American Tribes, consulting parties, and interested groups within 90 days following the exercise. The USAG Fort Carson notifies the SHPO within 72 hours following a notification to the Cultural Resources Manager of any reported entry or impact to a protected property, to include natural impacts, as required by Stipulation IV.C.

We have implemented cultural resources awareness training for all personnel as required under Stipulation V. In accordance with Stipulation VI, an annual report is prepared and submitted to the SHPO, Tribes, consulting parties, and interested groups no later than November 15th of each year; the report is made available to the public on the USAG Fort Carson website; and a meeting is held annually with the SHPO, Tribes, consulting parties, and interested groups.

N1MA's Comment #4: *Proceeding with the proposed amendments requires an Environmental Assessment ("EA") to be prepared under the National Environmental Policy Act ("NEPA") because allowing cover-ups of future violations could have significant impacts on the environment, threatening a continuance of, and likely increase of, cultural resource protection violations and thus significant new actual damage to, and potential loss of, protected cultural resources. N1MA hereby demands that an EA be prepared without further delay.*

USAG Fort Carson's Response #4: At this time, we do not anticipate the need for an Environmental Assessment (EA) to assess the proposed amendments. Environmental analysis has been completed for the Army's training and operations activities at PCMS. The Piñon Canyon Maneuver Site (PCMS) Training and Operations Final Environmental Impact Statement was completed in March 2015, with a Record of Decision issued in May 2015. In 2017, Fort Carson completed an EA that analyzed the potential impacts related to the implementation of an Integrated Cultural Resources Management Plan (ICRMP) for the USAG Fort Carson-managed lands for fiscal years (FY) 2017- 2021 (2017 ICRMP). Both are available at <http://www.carson.army.mil/DPW/nepa.html>. The ICRMP comprehensively describes the Cultural Resources Program for Fort Carson and PCMS. The ICRMP EA resulted in a Finding of No Significant Impact (FONSI). We will continually assess this concern throughout the process and comply with NEPA at the appropriate juncture.

N1MA's Comment #5: *Army's proposed amendments to the 2014 PA appear to proceed on the assumption that its performance merits giving Army greater flexibility in handling its duties under the 2014 PA. Nothing could be further from the truth.*

In fact, what Army's past performance demonstrates is ongoing and continuing violations of the 2014 PA, including new violations piling up faster than the old ones are resolved, resulting in a never-ending state of noncompliance.

Many of the violations are very basic and reflect a reckless disregard of Army's cultural resources obligations.

USAG Fort Carson's Response #5: The proposed amendments do not provide greater flexibility to our responsibilities under the PCMS PA. We take our cultural resources management obligations seriously, and have made noteworthy improvements to the program and for the protection of historic properties since the implementation of the PCMS PA.

N1MAI's Comment #6: *For example, just this past April, Army conducted massive Stryker, Humvee, and other military operations through protected cultural sites in snowy and rainy spring weather, reportedly intruding upon 45 sites. Violations were reported in areas where military activities were restricted.*

USAG Fort Carson's Response #6: As stated in the after action report for the 2017 training exercise, entries occurred at 45 sites, and some of these entries did occur in areas where vehicles are not authorized off established roads. It is very important to note that a site entry does not equate to an adverse effect to a historic property. In compliance with the 2014 PA, after action inspections were conducted and a report was submitted to the SHPO, Native American Tribes, consulting parties, and interested groups within 90 days of the completion of the exercise. Section 106 consultation is ongoing. We are in compliance with the PCMS PA and the NHPA.

N1MAI's Comment #7: *Army lags behind deadline in studying cultural sites that need further documentation.*

USAG Fort Carson's Response #7: The USAG Fort Carson continues to be proactive in the evaluation of needs data sites. Since 2014, the USAG Fort Carson has evaluated approximately 235 needs data sites, 129 of which have already received SHPO concurrence, 88 are currently being reviewed by the SHPO, and 18 are in the final document review stage internally.

Stipulation I.B states the documentation for these resources will be completed within three years of execution of the PCMS PA if protection measures as required in Stipulation III.A have not been instituted. Needs data sites are administratively protected; some have physical protection measures in place as well. All needs data sites are included in our Geographic Information System (GIS) database, as well as the digital map for use in the Blue Force Tracker systems. This information is provided to proponents, in the appropriate format, prior to the initiation of an undertaking, including military training.

N1MAI's Comment #8: *Army fails to train soldiers, environmental protection officers, and relevant agencies of the need to be alert for, and avoid, unmarked sites, which constitute most of the protected sites.*

USAG Fort Carson's Response #8: The Army engages in a comprehensive and far-reaching educational outreach for Soldiers and other users of the PCMS. For example, see the link to Cultural Resources Awareness video at

<http://www.carson.army.mil/DPW/nepa.html>. The Environmental Battle Book contains a cultural resources section, and can be found online at <http://www.carson.army.mil/DPW/>.

In addition to the Cultural Resources Awareness video and the Environmental Battle Book, which are more general, cultural resources awareness is taught during the Environmental Protection Officer (EPO) course by the Cultural Resources Manager. The cultural resources section is tailored specifically for EPOs, and is meant to provide a brief overview, as well as where they can find the appropriate tools to successfully complete their job. One of the slides covers site protection measures, to include how to read the protected resources map symbols (red polygon = unmarked site; red polygon with yellow outline = marked site; white line through protected boundary = authorized passageway). This is discussed in more detail during the class.

Additional training materials, briefs, and presentations are provided on an as-needed basis, and are tailored to the specific situation. For example, cultural resources awareness training is provided prior to large-scale exercises; this training includes information on the nature, importance, and location of marked and unmarked sites.

N1MA!'s Comment #9: *Not enough sites are marked. Those that are marked don't have sufficient markings. Not enough sites are provided with protections that prevent intrusion.*

USAG Fort Carson's Response #9: The USAG Fort Carson continues to emplace physical protection measures at protected properties that are accessible to vehicles. We routinely add more markers at previously marked sites where our after action inspections identify opportunities. We have recently awarded a contract to mark several sites with boulders where Seibert markers will also be added.

N1MA!'s Comment #10: *After Action Reports pretend that "indirect" effects of military operations using soldiers, contractors, and weapons systems from all around the country don't exist.*

USAG Fort Carson's Response #10: Our determinations of effects do take into account direct, indirect, and cumulative effects from all elements of all events at PCMS.

N1MA!'s Comment #11: *The list goes on and on.*

These ongoing violations are not surprising that Army's express policy is to ensure minimum compliance with the NHPA and other cultural laws so it can maintain "the largest possible area for military training." Fort Carson Reg. 200-1 §9-1(a).

USAG Fort Carson's Response #11: One mission of the 4th Infantry Division and Fort Carson is to prepare "trained and ready expeditionary forces for deployment in support of Combatant Commander requirements." The USAG Fort Carson's mission is to provide "mission readiness, support, and services for Fort Carson Soldiers, Families, and the Community to fight and win our nation's wars." The primary mission of the

Cultural Resources Management Program is to support the military training requirements, while ensuring compliance and stewardship responsibilities are met. In context, the actual policy established by the regulation you cite is to "Sustain compliance with all cultural resources laws and regulations to identify, evaluate, maintain, preserve, and protect all types of cultural resources, to include Native American Traditional Cultural Properties and Sacred Sites, **while maintaining** the largest possible area for military training." (Emphasis added)

N1MA's Comment #12: *What is needed here is not amendment providing flexibility for Army, but termination of the 2014 Programmatic Agreement, thereby forcing Army to comply with Section 106 of the NHPA under regular procedures to ensure these ongoing violations are, in the future, foreseen, and prevented.*

USAG Fort Carson's Response #12: Thank you for your comment. We believe the proposed amendments will improve the process, enable more informed decisions, and benefit the overall management of cultural resources at the PCMS.

N1MA's Comment #13: *Army needs to prepare an Environmental Assessment prior to proceeding with amendments of the 2014 PA, and N1MA hereby demands that such action be taken.*

First, there is no emergency demanding amendment of the 2014 PA, nor is adoption of an amendment to the programmatic agreement exempt by law from NEPA compliance. 32 C.F.R. §651.11(a), (b).

Second, there is no categorical exclusion applicable under 32 C.F.R. §651.11(c), because sensitive cultural resources would be adversely affected, 32 C.F.R. §651.29(c), and because deleting binding interagency commitments for the protection of cultural resources is not among the activities listed in 32 C.F.R. §651, Part B, §II(d). Furthermore, the proposed amendments involve substantive change in protection measures for cultural resources. 32 C.F.R. §651, Part B, §II(d).

Under Army regulations, 32 C.F.R. §651.11(c), when proposed Army actions involve neither categorical exclusions, emergencies nor categories exempted by law, such actions:

"...must be analyzed to determine if they could cause significant impacts to the human or natural environment (see §651.39). The EA determines whether possible impacts are significant, thereby warranting an EIS. This requires a 'hard look' at the magnitude of potential impacts, evaluation of their significance, and documentation in the form of either an NOI to prepare an EIS or a FNSI...The EA is a valuable planning tool to discuss and document environmental impacts, alternatives, and controversial actions, providing public and agency participation, and identifying mitigation measures." (emphasis supplied).

Army's October 25, 2017, email containing notification of these proposed amendments contains no discussion of NEPA requirements nor notice of scoping or development of plans to prepare an EA. Army pretends that the changes in question are merely "administrative" as if this were perhaps some sort of excuse.

It is not. The changes proposed affect actual on-the-ground activities and threaten future damage to cultural resources and the environment.

Proceeding further without proper environmental analysis, public input and public disclosure would be a gross violation of the NEPA.

USAG Fort Carson's Response #13: Please refer to our response to Comment #4.

N1MA!'s Comment #14: *Army proposed to Change Section II.B of the 2014 PA prohibiting vehicle intrusions to protected cultural sites to create an ambiguous new exception for "authorized passageways." This proposed amendment is wholly unwarranted. It is more properly understood as a vast "loophole" allowing Army to explain away, and deny, future likely intrusions on protected cultural sites.*

As it exists, the paragraph already allows an exception for travel on "existing roads." In Army's overly broad interpretation already, this is stretched to include old "two track" remnants that really are not "roads."

Extending this further to exclude "authorized passageways" – undefined, or apparently definable any way Army wants – essentially turns the whole prohibition on its head, and instead would allow any vehicle intrusions on protected property without violation simply based on an unmonitored or unverifiable Army say so.

This language change – "authorized passageways" – should be firmly rejected. During the 2017 Operation Raider Focus II, 45 vehicle intrusions were admitted on the 200 protected cultural sites inspected. Many sites within the Area of Potential Effects ("APE") were not properly inspected after the fact so the extent of damage is likely larger.

What the new language would do is simply allow Army, in the future, to "define away" intrusions as having occurred on "authorized passageways" known only to Army, thereby reporting zero violations despite multiple actual on-the-ground intrusions.

Army has committed [sic] to comply with the 2014 PA. It should be held to account for that.

USAG Fort Carson's Response #14: The original language of Stipulation II.B allows for the travel through a protected property on an existing road. This stipulation has not been amended. Stipulation III.B was amended to align with Stipulation II.B, which provides for authorized passageways through protected properties, and requires these

passageways to be identified in Appendix 2. Any changes to Appendix 2 must be reviewed, and cannot be adopted unless concurred on by the SHPO.

The after action report explained our method for inspecting protected properties after the 2017 training exercise. All tracks were followed where exercise activities occurred, and all areas with reported maneuver damage were investigated.

N1MA's Comment #15: *Army proposes a series of changes to Stipulation IV and adds language in Appendices 2 and 3 that will result in a dramatically decreased frequency in monitoring by qualified cultural resource personnel of sites most affected by military activities. Army attempts to justify this change by substituting more lenient language it unilaterally adopted in its 2017 Integrated Cultural Resources Management Plan ("ICRMP") for language agreed to with the other parties in the 2014 PA.*

None of this has any merit. No degree of reduction in monitoring is warranted in light of the past and ongoing history of violations of the 2014 PA by Army. Further, the 2014 PA was attached to the 2017 ICRMP and contains explicit terms indicating Army is bound to comply with the programmatic agreement. Thus, it was understood at the time the ICRMP was adopted that the terms of the 2014 PA were binding on Army.

Even if there were any discrepancy between the 2014 PA and the ICRMP terms, Army is bound to comply with both. Fort Carson Reg. 200-1 §§ 9-1(b), 9-4(e). That is, if the 2014 PA calls for more frequent and intense monitoring than the ICRMP, Army cannot rely on the lax schedule it adopted in the ICRMP to avoid its commitments in the 2014 PA.

Further, the obvious purpose of this change is not as Army cynically suggests it is to conform the language of the ICRMP and the 2014 PA, but rather to do so in a way that reduces monitoring by qualified personnel, and thus reduces discovery and reports of violations, and thus produces "better" paperwork. An amendment that incentivizes such tactics is likely to actually cause more on-the-ground impacts even while allowing Army to report fewer violations.

Just by way of example, the 2014 PA at Stipulation IV calls for high frequency monitoring, defined as no less than every year, and performed by a subject matter expert, for areas subject to potentially more serious effects of military activities. Under the proposed amendment, many of these monitoring events will be required after only three or five years, and may be performed by non-expert personnel. Thus, the procedural change will have the necessary effect of making appear there are fewer effects of military activities on cultural resources, and producing lower quality documentation of such effects, where they do occur.

This is a drastic and unwarranted change, not an "administrative" and "conforming" change. It should be soundly rejected.

USAG Fort Carson's Response #15: Please refer to our response to Comment #2. We comply with Fort Carson Regulation 200-1, which merely sets broad and programmatic goals in accordance with NHPA requirements.

N1MA's Comment #16: *Other changes that deserve firm rejection: 1) Army also proposes changes to Section IV.D and VII.C of the 2014 PA that would allow it to change the "protected status" of particular properties and the inspection frequencies without needing to obtain approval of the other parties to the 2014 PA. This is merely another way for Army to "define away" lack of compliance with the PA in its sole discretion. There is no merit to it. If, for example, Army fails to meet monitoring deadlines in the 2014 PA, this proposed change would allow Army to merely deny a violation by instantaneously and unilaterally changing the inspection frequencies required.*

USAG Fort Carson's Response #16: The addition of Stipulation IV.D states updates to Appendix 2 may be **proposed** in response to new data in accordance with Stipulation VII.C. Stipulation VII.C states changes to Appendix 2 will be **proposed** in the annual reports and adopted through written concurrence between the USAG Fort Carson and SHPO. Changes to Appendix 2 cannot be made instantaneously or unilaterally, as suggested in your comment. These changes will undergo review, and must have concurrence from the SHPO before being implemented.

N1MA's Comment #17: *2) Army proposes to exempt routine maintenance and repair outside of historic properties not only from advance Section 106 consultation under the NHPA, but also from even reporting these undertakings occurred in Army's cultural resources annual report. 2014 PA §VI.A.2. This proposal does not save Army much in terms of time and resources, but it does give Army a vague new loophole under which advance Section 106 consultations need not occur, and Army never has to even reveal that violations may have occurred based on its definitional interpretation. This is unwarranted. Language that allows effective policing of Army's recalcitrant compliance with NHPA is very appropriate and should not be deleted.*

USAG Fort Carson's Response #17: Renovations, construction, deconstruction, ground-disturbing activities, and similar actions require compliance with a "Work Request" process, while routine maintenance and repair of existing facilities are completed via a "Service Order" process. These routine maintenance and repair activities that would not be reported under Stipulation VI.A.2 include activities, such as painting interior walls, changing door locks, changing light fixtures, repairing garbage disposals, etc., which are completed by facility maintenance personnel. These minor maintenance and repair activities are currently not reported in the annual reports. Through discussion with the SHPO and the ACHP, we have proposed this language in order to be very clear and transparent concerning these minor activities, which would continue to fall below the reporting threshold. Activities completed via the "Work Request" process will still continue to be reported in the annual reports.

N1MA!'s Comment #18: 3) *The added "Whereas" clause at page 1 of the proposed amendments specifying that Army take responsibility for the activity of licensees "coordinated and approved by Army" should not be so limited. Army tightly controls access to PCMS. Any activities of licensees on PCMS are effectively approved by Army and thus Army is responsible for NHPA compliance of those activities.*

USAG Fort Carson's Response #18: The Whereas clause does clarify undertakings proposed by licensees, lessees, permittees, and tenant units are covered under the PCMS PA. It further clarifies these activities are done in coordination with and are reviewed and approved by the USAG Fort Carson. The Army is responsible for NHPA compliance for those activities.

N1MA!'s Comment #19: 4) *The proposed change at Appendix 1.A.2.d of the 2014 PA should not exempt removal of historic infrastructure and equipment, such as windmills, waterworks, etc.*

USAG Fort Carson's Response #19: The proposed change at Appendix 1.A.2.d does not exempt the removal of any infrastructure, equipment, or buildings that are considered historic properties as defined in the NHPA or protected properties as defined in the PA. The first sentence of the first paragraph of Appendix 1 states "Exempted undertakings **shall not** occur within protected properties..." (emphasis added).

N1MA!'s Comment #20: *The bottom line is this: The proposed amendments should be rejected. Allowing Army to avoid reporting new violations based on "definitional change" and decreased monitoring is an idea with little merit. In light of the continuing and increasing violations at Piñon Canyon Maneuver Site, termination of the 2014 PA, not amendment of it, is the appropriate step. Any amendment, additionally, must be accompanied by an appropriate Environmental Assessment including public disclosure, public input and environmental analysis before it is adopted.*

USAG Fort Carson's Response #20: Please refer to our response to Comments #2, #3 and #4.

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January 16, 2018

VIA U.S. MAIL AND EMAIL

james.a.lessard4.civ@mail.mil; george.w.thomas16civ@mail.mil;
jennifer.r.kolise.civ@mail.mil

James A. Lessard, Environmental Division Chief
Wayne Thomas, Chief, NEPA & Cultural Management Branch
Jennifer Kolise, Cultural Resource Manager
Department of the Army, USIMCOM / DPW
1625 Evans Street, Building #1219
Fort Carson, Colorado 80913-4143

Re: Additional Comments, Proposed Amendments to 2014 Programmatic Agreement For Protection of Cultural Resources on Piñon Canyon Maneuver Site, Colorado

Dear Mr. Lessard, Mr. Thomas, and Ms. Kolise:

Thank you for your letter of December 20, 2017, responding to Not 1 More Acre!'s ("N1MA!") comments regarding Army's proposed amendments to the 2014 Programmatic Agreement ("2014 PA") pertaining to protection of cultural resources on Piñon Canyon Maneuver Site ("PCMS"), Colorado.

It is perhaps too much to describe the letter as a "response" because, in truth, the letter merely rejects virtually every comment made by N1MA! concerning potential impacts to protected cultural resources on PCMS.

N1MA! regards the response as misleading and incorrect in most respects and unduly focused, as in the past, on paperwork, while being indifferent and adverse to protection of cultural resources at PCMS.

The admission that Department of Army's cultural resources program exists merely to serve its mission, and "maintaining the largest possible area for military training" at PCMS, goes a long way in explaining Army's ongoing poor performance under the National Historic Preservation Act ("NHPA") and the 2014 PA. Further, this admission, enshrined in written Army regulation, F.C. Reg. 200-1, §9-1(a), graphically demonstrates why Army should not be given additional flexibility or discretion in handling cultural resources monitoring and compliance matters at PCMS, as proposed in the 2014 PA amendments.

A few points need to be emphasized.

1) “Consultation” under NHPA. Sending a letter rejecting all comments of an interested party does not satisfy a federal agency’s statutory and regulatory duty of meaningful “consultation” required by the NHPA. The importance of consultation under the NHPA is so significant there is a regulatory definition of the term, along with expert agency guidance. 36 C.F.R. §800.16(f); 63 Fed. Reg. 20496, 20504 (Apr. 24, 1998).

2) Alleged NHPA “Compliance.” The letter states that “Entries or other impacts to protected properties do not equate to non-compliance with the NHPA or the PA.” Despite many and repeated intrusions on protected properties which the 2014 PA says are “not permitted,” the letter states because of ongoing consultations “we are in compliance with the PCMS PA and the NHPA.” This is incorrect. A violation of the 2014 PA (and here there are multiple and repeated violations) is a violation of the NHPA.

Regulations under the statute make clear that the “legal effect” of alternate procedures -- such as using programmatic agreements instead of pre-activity Section 106 consultations -- is that these procedures “substitute for the [advisory council’s] regulations for the purposes of the agency’s compliance with section 106.” 36 C.F.R. §800.14(a)(4).

Thus, a violation of the 2014 PA is a violation of the NHPA.

Many of the Army’s multiple violations of the 2014 PA remain unresolved, and some have been unresolved for years. New violations continue to pile up faster than old ones are resolved. This is not the time to be indulging Army desires to loosen NHPA requirements.

3) NEPA Compliance. The letter states that Army does “not anticipate the need for an Environmental Assessment (EA) to assess the proposed amendments” under the National Environmental Policy Act (“NEPA”) claiming the impacts have already been covered in the 2015 PCMS Training and Operations Environmental Impact Statement (“T&O EIS”) and the 2017 Integrated Cultural Resources Management Plan Environmental Assessment (“ICRMP EA”).

This claim ignores the fact that these prior NEPA documents could *not* have considered the impacts of the proposed 2014 PA amendments because the proposed amendments were not in existence at the time these documents were prepared. Army regulations make clear that *newly proposed actions* require *new* NEPA analysis. 32 C.F.R. §651.46.

Further, both of those NEPA documents, the T&O EIS and the ICRMP EA, assumed that the Army would be in compliance with the 2014 PA to mitigate environmental impacts, as is required by both Army and Council on

Environmental Quality regulations. 32 C.F.R. §651.15(g), (“The proponent agency ... will implement mitigations and other conditions established in the EA or EIS, or commitments made in the FNSI or ROD.”); 40 C.F.R. §1505.3 (“Mitigation and other conditions established in the environmental impact statement or during its review and committed as part of the decision shall be implemented by the lead agency or other appropriate consenting agency.”)

Instead, what we have here is a long trail of 2014 PA mitigation violations following NEPA analysis that remain uncorrected and unresolved to this day, followed by proposed amendments to the PA designed to create loopholes and shift monitoring duties such that future reporting of violations will be reduced without actually reducing any future violations or impacts to cultural resources on the ground.

Neither the PCMS T&O EIS nor the ICRMP EA considered that scenario which unfortunately has come to pass. For example, the PCMS T&O EIS projected minor and negligible impacts to cultural resources, at page S-11, based on the following mitigation:

“In accordance with the PCMS PA, all eligible sites and sites with unknown eligibility are avoided during set up for proposed training activities and during the training activities themselves. Sites are monitored to make sure they remain intact, undisturbed, and not damaged during training exercises.” (p. S-19).

The EA and Finding of No Significant Impact for the ICRMP, which was all of two pages, projected positive impacts to cultural resources, citing among other things, the 2014 PA.

No NEPA document has considered, taken a “hard look” at and disclosed to the public, the consequences of severe, repeated violations of the 2014 PA by Army coupled with efforts to change and loosen restrictions in the agreement.

Army claims that old NEPA documents cover plans changed years after the fact have been found “unpersuasive” in the past and rejected by courts *Lemon v. McHugh*, 668 F. Supp. 2d 133, 140 (D.D.C. 2009). Further, compliance with NHPA, even if Army could validly claim that here, does not satisfy NEPA’s duties, which are independent of NHPA. *E.g., Lemon*, 668 F.Supp.2d at 144.

Other points in the “response” letter are incorrect or misleading but need not be detailed here. This is not the time to be amending the 2014 PA to permit gaping new loopholes for “authorized passageways” supposedly through protected properties or to shift Army monitoring efforts away from the impacts of military activities, which have proven to be severe, repeated and unresolved.

Army would be better served by complying with the National Historic Preservation Act, the 2014 Programmatic Agreement and National Environmental Policy Act, rather than trying to change the rules of the game after the fact to avoid reporting violations that cause significant on the ground harm to cultural resources on Piñon Canyon Maneuver Site. The Advisory Council on Historic Preservation and the State Historic Preservation Office should not let Army's quest to use every possible square inch of territory at Piñon Canyon for training – no matter what the cost – swallow up and eviscerate Army's responsibility to uphold the law and protect the large variety and complex mixture of cultural resources on PCMS.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Aguerre". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jean Aguerre for Not 1 More Acre!

cc: ACHP
SHPO



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 18, 2018

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

Dear Ms. Aguerre:

Thank you for your correspondence dated January 16, 2018, providing feedback on our responses to your comments concerning the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA).

We have seriously considered and evaluated all your comments, and this letter makes further reply to the following matters you have raised. The proposed amendments are not designed to provide greater flexibility or discretion in handling cultural resources. They do not allow the USAG Fort Carson to avoid reporting violations. The proposed amendments provide greater clarity for certain stipulations and undertakings. For example, the amendments describe the site monitoring program in better detail by identifying documentation standards for inspections and long-term monitoring, documentation standards for observed impacts (natural and cultural), and by clarifying the process for conducting inspections and long-term monitoring. The authorized passageways discussed in the proposed amendments are not "gaping new loopholes." The original PCMS PA allows for passage through protected properties on existing roads. The amendments require USAG Fort Carson to designate identify protected properties with existing travel corridors within Appendix 2. This will increase transparency concerning the sites that these authorized passageways transect.

Points of contact for this action are Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-503-6136; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,

A handwritten signature in black ink, appearing to read "James A. Lessard", is written over the typed name.

James A. Lessard
Chief, Environmental Division

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January 30, 2018

VIA U.S. MAIL AND EMAIL:

[\(james.a.lessard4.civ@mail.mil\)](mailto:james.a.lessard4.civ@mail.mil); george.w.thomas16civ@mail.mil;
jennifer.r.kolise.civ@mail.mil)

James A. Lessard, Chief, Environmental Division
Wayne Thomas, Chief, NEPA & Cultural Management Branch
Jennifer Kolise, Cultural Resource Manager
Department of the Army, USIMCOM / DPW
1625 Evans Street, Building #1219
Fort Carson, Colorado 80913-4143

Re: Additional Comments, Proposed Amendments to 2014 Programmatic Agreement For Protection of Cultural Resources on Piñon Canyon Maneuver Site, Colorado

Dear Mr. Lessard, Mr. Thomas, and Ms. Kolise:

Thank you for your letter of January 18, 2018, responding to Not 1 More Acre!'s ("N1MA") comments regarding Army's proposed amendments to the 2014 Programmatic Agreement ("2014 PA") pertaining to protection of cultural resources on Piñon Canyon Maneuver Site ("PCMS"), Colorado.

We look forward to addressing these matters further through the public participation process required as a part of an Environmental Assessment.

In the meantime, a few of Army's latest comments should be addressed.

Army states: "The proposed amendments are not designed to provide greater flexibility or discretion in handling cultural resources."

N1MA Response: Intent aside, the proposed amendments, if adopted, would provide Army greater flexibility and discretion in handling cultural resources.

The proposed change to Section VII.C would allow Army to amend the Programmatic Agreement pertaining to inspection frequencies and protection status of protected properties without obtaining the consent of all signatories, only the State Historic Preservation Office ("SHPO").

The proposed change to Section IV.D appears to allow Army to change inspection frequencies, even without SHPO's concurrence, as part of something called an "update." An "update" apparently also could involve methodological changes to monitoring and inspections.

The proposed change to Section III.C seeks to change the prohibition-of military vehicle intrusions on the perimeter of protected properties exempting travel on “existing roads,” to now exempt travel on “authorized passageways,” where the term “passageways” is not defined, and only SHPO, and not all the signatories to the PA, would be in a position to know or object.

All of these changes, if adopted, would give Army greater flexibility in handling cultural resources. Maybe, granting Army’s statement that that was not the intended result, it is just a remarkably fortuitous coincidence from Army’s standpoint.

Army states: “[The Amendments] do not allow the USAG Fort Carson to avoid reporting violations.”

N1MA Response: Since the concept of designating “authorized passageways” appears to be in large areas currently exempt as “existing roads,” the end result of adopting these amendments could lead to less reported violations since so many violations to date have involved intrusions on protected properties not on existing roads. And, who would know how many additional “existing roads” might be designated or “authorized”? Typically, existing roads through sites can be used so long as the footprint of the road remains the same. Additional width would not be allowed without inventory or some sort of verified examination to ensure cultural materials will not be impacted. Existing roads should have their perimeters staked, flagged, or fenced to prevent straying from the road through a site.

Further, the monitoring/inspection changes advocated by Army would lead to less frequent monitoring of sites that have been habitually harmed by military operations, and more of that monitoring would be done by persons without archaeological expertise. Less monitoring of military operations by qualified personnel will inevitably lead to less discovery of violations, and thus, less reporting of violations.

Army states: “The authorized passageways discussed in the proposed amendments are not “gaping new loopholes.” The original PCMS PA allows for passage through protected properties on existing roads.”

N1MA Response: The original PCMS PA prohibited military vehicle intrusions on the perimeter of protected properties exempting “travel” on “existing roads.” It did not mention “passageways,” whatever those are. It did not mention “authorization.” The proposed amendment sets up a process where Army bargains with SHPO (without the participation of other signatories) to expand -- without limit or advance disclosure -- the designation of “existing roads” and “passageways” thereby “authorizing” vehicle intrusions on protected properties that would otherwise be violations.

The photos below show the scope of what could be designated “existing roads” and / or “authorized passageways” on PCMS. Further expansion of the concept of “existing roads” is completely unnecessary and unwarranted.



Figure 1: PCMS



Figure 2: PCMS



Figure 3: PCMS



Figure 4: PCMS

Given that the consequences of designating additional or expanded “existing roads” or “authorized passageways” will be to allow the Army to maneuver tanks, Strykers and other military-grade vehicles through supposedly protected cultural properties during wargame operations conducted day and night, in rainy and snowy weather on wet soils, it is not overstating the matter to describe these changes as “adding gaping loopholes.”



Figure 5: PCMS

Accordingly, we submit that Army resources are better spent coming into compliance with the National Historic Preservation Act and preventing likely future violations than pursuing amendments of this ilk.

Please notify N1MA! when scoping for the Environmental Assessment will begin.

Sincerely,

A handwritten signature in black ink, appearing to read "Jean Aguerre".

Jean Aguerre for Not 1 More Acre!

cc: ACHP
SHPO

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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

March 9, 2018

Office of the Director

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

Dear Ms. Aguerre:

Thank you for your correspondence dated January 30, 2018, concerning your additional comments on the proposed amendments to the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado*. The USAG Fort Carson's position on these matters has been fully explained in our prior correspondence dated December 20, 2017, and January 18, 2018; therefore, we have no additional response at this time.

The point of contact for this matter is Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,


Har K. Aguirre
Director of Public Works

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ENCLOSURE 7:
PAST FOUR BRIGADE TRAINING EXERCISES DOCUMENTATION

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**Past PCMS Brigade Exercises (2010, 2013, 2015, 2017)
Timeline of Correspondence**

- **26 January 2011:** USAG Fort Carson submits after action report for the 2010 2-4 BCT “Warhorse Rampage” Training Exercise to the SHPO.
- **28 February 2011:** SHPO provides comments on 2010 training exercise [CHS #58008].
- **27 June 2013:** USAG Fort Carson submits after action report for the 2013 2-4 BCT “Warhorse Charge” Training Exercise to the SHPO.
- **12 July 2013:** SHPO provides comments on the 2013 training exercise [CHS #63119].
- **18 September 2013:** USAG Fort Carson provides requested site documentation and other information to the SHPO in response to 12 July 2013 letter [CHS #63119].
- **25 October 2013:** USAG Fort Carson reported vandalism that occurred at site 5LA5555 during the 2013 training exercise [CHS #63119].
- **31 October 2013:** SHPO responds to 18 September 2013 letter.
- **14 May 2015:** USAG Fort Carson sends a letter to the SHPO stating consultation for the 2013 training exercise has been concluded.
- **16 June 2015:** SHPO does not concur that Section 106 consultation has been adequately completed for the 2013 training exercise [CHS #63119].
- **16 September 2015:** USAG Fort Carson submits after action report and supporting documentation for the 2015 1SBCT “Raider Focus I” Training Exercise to the SHPO.
- **23 November 2015:** SHPO provides comments on the 2015 training exercise’s after action report. At this time, SHPO concurred with the findings of effects for 23 sites. SHPO also inquires as to the status of the consultation for the 2010 and 2013 training exercises [HC #69195].
- **8 November 2016:** USAG Fort Carson informs SHPO that consultation to resolve adverse effects associated with the 2010, 2013, and 2015 training exercises will be combined into one consultation packet instead of continuing to consult on the three separately. Correspondence includes responses to the 28 February 2011 letter [CHS #58008], the 14 May 2015 letter [CHS #63119], and the 23 November 2015 letter [HC #69195].
- **4 May 2017:** USAG Fort Carson staff met with SHPO staff at History Colorado to discuss information sent on 8 November 2016 and way forward.

- **27 July 2017:** USAG Fort Carson submits the 2017 1SBCT “Raider Focus II” Training Exercise’s after action report and associated site documentation to the SHPO.
- **18 January 2018:** USAG Fort Carson continues consultation efforts regarding the 2010, 2013, and 2015 training exercises, and informs the SHPO that the 2017 training exercise have been included in the consultation for the past brigade exercises.
- **1 March 2018:** SHPO provides comments on 16 January 2018 correspondence regarding past brigade exercises (2010, 2013, 2015, and 2017) [HC #71348].
- **20 March 2018:** USAG Fort Carson submits technical report and site documentation for 5LA10858 evaluation, and requests concurrence with determination of eligibility and finding of effects.
- **28 March 2018:** USAG Fort Carson submits technical report and site documentation for 2017 evaluation project, and request concurrence with determinations of eligibility and findings of effects for 5LA3208, 5LA3254, 5LA3300, 5LA3384, 5LA4399, 5LA4430, 5LA4950, 5LA5697/5LA10840, 5LA5698, and 5LA12588.
- **9 April 2018:** SHPO concurs with determination of eligibility and finding of effects for 5LA10858 [HC #64252].
- **13 April 2018:** USAG Fort Carson provides response to 1 March 2018 correspondence [HC #71348].
- **25 April 2018:** SHPO concurs with determinations of eligibility and findings of effects for 5LA3208, 5LA3254, 5LA3300, 5LA3384, 5LA4399, 5LA4430, 5LA4950, 5LA5698, and 5LA12588. SHPO concurs with determination of eligibility for 5LA5697/5LA10840, but did not concur with finding of effect [HC #74013].
- **2 August 2018:** SHPO provides comments on 13 April 2018 correspondence [HC #71348].
- **2 August 2018:** SHPO provides comments on 27 July 2017 correspondence [HC #72672].
- **12 September 2018:** USAG Fort Carson staff meets with SHPO staff at History Colorado.
- **14 September 2018:** SHPO provides correspondence revising previous comments in the 2 August 2018 letters [HC #71348 & HC #72672], as a result of the 12 September meeting [HC #71348].



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

January 18, 2018

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

Dear Mr. Turner:

This letter is a follow-up to correspondence dated November 8, 2016, and a meeting with your staff on May 4, 2017, concerning past brigade training exercises at the Piñon Canyon Maneuver Site (PCMS), specifically the 2010 2-4 Brigade Combat Team (BCT) "Warhorse Rampage" Training Exercise, the 2013 2-4 BCT "Warhorse Charge" Training Exercise, and the 2015 1st Stryker BCT (1SBCT) "Raider Focus" Training Exercise. The USAG Fort Carson is also following up to our correspondence dated July 27, 2017, concerning the after action report for the 1SBCT "Raider Focus" Training Exercise held at the PCMS between April 11 and May 9, 2017 for which we have not received an official response from your office. We hope to continue discussions so that we may come to a final resolution for these undertakings.

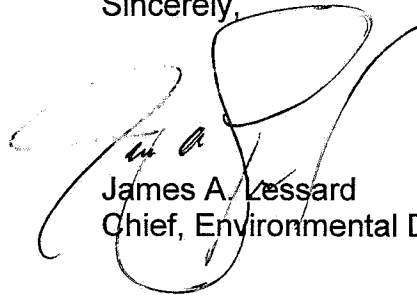
Our correspondence dated November 8, 2016, included summaries of correspondence between our offices, updates and revisions to the findings and recommendations, and responses to your comments on the 2010 2-4 BCT "Warhorse Rampage" Training Exercise, 2013 2-4 "Warhorse Charge" Training Exercise, and 2015 1SBCT "Raider Focus" Training Exercise. This information was discussed at a meeting with your staff on May 4, 2017, at which time suggestions were made to revise how the data is presented in the tables, such as including the criteria under which a site is eligible for inclusion in the National Register of Historic Places (NRHP). Enclosure 1 includes these revised tables. The tables only include those sites for which concurrence has not been given on the determination of effects from the past four brigade training exercises (2010, 2013, 2015, and 2017). Table 1 lists the 76 eligible sites reported as entered or impacted during one or more training exercises; Table 2 lists the 34 needs data sites reported as entered or impacted during one or more training exercises; and Table 3 lists the 19 ineligible sites. Enclosure 2 includes a copy of the letter and supporting documentation mailed to your office in November 2016.

The USAG Fort Carson is requesting concurrence with our determinations of effects as listed in Tables 1, 2, and 3 of Enclosure 1. We are also requesting concurrence with our determinations of eligibility for 14 of the 34 needs data sites listed in Table 2 of Enclosure 1.

A copy of this letter has also been provided to the 13 culturally-affiliated Native American Tribes; Las Animas County Board of Commissioners; Otero County Board of Commissioners; Colorado Council of Professional Archaeologists; Colorado Preservation, Inc.; Bent's Old Fort Chapter of the Santa Fe Trail Association; Comanche National Grasslands, U.S. Forest Service; Dr. Larry Loendorf; Loudon-Henritze Archaeology Museum, Trinidad State Junior College; Not 1 More Acre!; and Southern Colorado Environmental Council.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'James A. Lessard', is written over a large, stylized circular flourish.

James A. Lessard
Chief, Environmental Division

Enclosures

ENCLOSURE 2
Documentation Submitted to SHPO
(November 20, 2016)

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REPLY TO
ATTENTION OF

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

November 8, 2016

Office of the Director

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

Dear Mr. Turner:

This letter is in response to your correspondence regarding the 2010 2-4 Brigade Combat Team (BCT) "Warhorse Rampage" Training Exercise, the 2013 2-4 BCT "Warhorse Charge" Training Exercise, and the 2015 1st Stryker BCT (1SBCT) "Raider Focus" Training Exercise that have been conducted at the Piñon Canyon Maneuver Site in July-August 2010, February-March 2013, and May-June 2015 respectively. As illustrated in your correspondence, there are several issues that we have not adequately addressed. The intent of this letter is to address these concerns and continue discussions so that we may come to a final resolution for these undertakings.

Enclosure 1 briefly summarizes correspondence between our offices, provides updates and revisions to the findings and recommendations, and addresses comments from your correspondence dated February 28, 2011, concerning the 2010 2-4 BCT "Warhorse Rampage" Training Exercise. Enclosure 2 includes similar information, as well as addressing your comments from correspondence dated June 16, 2015, for the 2013 2-4 BCT "Warhorse Charge" Training Exercise. Enclosure 3 addresses comments from your correspondence dated November 23, 2015, regarding the 2015 1SBCT "Raider Focus" Training Exercise. Enclosure 4 includes supporting documentation, such as requested site forms, photographs, maps, etc.

We respectfully request to meet with you and your staff to discuss our updated findings, proposed mitigations, and the development of Memorandum of Agreement to resolve for adverse effects to historic properties that have resulted from these training exercises. We propose that the meeting should be held at your offices at History Colorado in Denver.

Points of contact for this action are Jennifer Kolise, PCMS Archaeologist, jennifer.r.kolise.civ@mail.mil, 719-503-6136; or Wayne Thomas, Chief, NEPA & Cultural Management Branch, george.w.thomas16.civ@mail.mil, 719-526-1852.

Sincerely,

James A. Lessard
Chief, Environmental Division

Enclosures

Enclosure 1: 2010 2-4 BCT “Warhorse Rampage” Training Exercise, Piñon Canyon Maneuver Site (PCMS), July-August 2010

BACKGROUND:

Via correspondence dated January 26, 2011, the USAG Fort Carson initiated consultation with the Advisory Council on Historic Preservation (ACHP), Colorado State Historic Preservation Officer (SHPO), culturally-affiliated Native American Tribes, and other consulting parties concerning potential impacts to historic properties resulting from the 2010 2-4 Brigade Combat Team’s (BCT) “Warhorse Rampage” Training Exercise that was held at the Piñon Canyon Maneuver Site (PCMS) in July-August 2010. This letter and accompanying After Action Report (AAR) stated that 39 historic properties were entered by vehicles during the training event; in addition, training also occurred within areas that had not yet been inventoried for historic properties. The intent of the letter was to: 1) resolve for effects to the 39 historic properties; 2) receive concurrence on the determinations of eligibility for these 39 sites; and 3) receive concurrence on proposed protection measures for historic properties within areas designated for mechanized maneuver training. In conclusion, the Fort Carson Cultural Resources Manager (CRM) proposed a determination of “no adverse effects to historic properties” in accordance with 36 CFR 800.5(d).

In correspondence dated February 28, 2011 (CHS #58008), the SHPO provided concurrence with the USAG Fort Carson’s determinations of eligibility for 27 of the 39 sites, and recommended that 12 sites be considered “needs data” until further evaluation or issues raised by their office could be addressed. In addition, the SHPO did not concur with the USAG Fort Carson’s determination of effect, stating that the training exercise did result in adverse effects to historic properties.

In correspondence dated November 23, 2015, the SHPO inquired about the status of the Section 106 consultation for the 2010 2-4 BCT “Warhorse Rampage” Training Exercise. The letter further elucidates that their office has not received any additional documentation from the USAG Fort Carson since the correspondence dated January 26, 2011, and requested any files that document the consultation was satisfactorily resolved be provided to their office.

CURRENT FINDINGS:

In an effort to address concerns raised by the SHPO in correspondence dated February 28, 2011, and November 23, 2015, Jennifer Kolise, PCMS Archaeologist, conducted a thorough review of all files and/or records associated with the 2010 2-4 BCT “Warhorse Rampage” Training Exercise after action inspection of protected properties. Table 1 summarizes the site status at the time of the training event for the 39 sites discussed in the AAR, including determination of eligibility and physical protection measures; observations and recommendations made during the after action inspection; current site status, including determination of eligibility, physical protection measures, and date of baseline monitoring or re-evaluation; and updated findings and recommendations.

Since the initial consultation documentation:

- Twelve of the 39 sites have been determined as ineligible for inclusion in the National Register of Historic Places (NRHP), for which the USAG Fort Carson has received concurrence from the SHPO;

- Twenty-four sites have been determined as eligible for the NRHP, for which the USAG Fort Carson has received concurrence from the SHPO; and
- Three sites are considered "needs data."
- Of the 27 sites that are currently considered protected properties, 26 have physical protection measures, i.e. protection fence or Seibert markers, in place.
- Based on the Colorado Cultural Resource Survey Site or Property Reevaluation Form and site maps submitted as part of the AAR documentation, the following five sites were not entered, or otherwise impacted, by the 2010 2-4 BCT "Warhorse Rampage" Training Exercise, and should not have been included as impacted sites in the AAR: 5LA3240, 5LA3332, 5LA4950, 5LA5249, and 5LA5283.
- Adverse effects directly related to the 2010 2-4 BCT "Warhorse Rampage" Training Exercise occurred at the following two sites: 5LA2302 and 5LA3491.
- Adverse effects related to cumulative military training impacts have occurred at the following three sites: 5LA3120, 5LA3124, and 5LA9037.
- Adverse effects related to cumulative military training and natural impacts have occurred at 5LA8694.
- Adverse effects not related to the 2010 2-4 BCT "Warhorse Rampage" Training Exercise are occurring at the following four sites:
 - 5LA2320 – adverse effects due to neglect
 - 5LA4951 – potential adverse effects due to natural erosional processes
 - 5LA9188 – potential adverse effects due to natural erosional processes
 - 5LA9450 – potential adverse effects due to natural erosional processes
- The following four sites were also entered during the 2013 2-4 BCT "Warhorse Charge" Training Exercise: 5LA3421, 5LA9188, 5LA9450, and 5LA9471.
- Site 5LA4940 was also entered during the 2015 1st Stryker Brigade Combat Team's (1SBCT) "Raider Focus" Training Exercise.
- Site 5LA9037 was also entered during both the 2013 2-4 BCT "Warhorse Charge" Training Exercise and the 2015 1SCBT "Raider Focus" Training Exercise.

USAG FORT CARSON'S RESPONSE TO SPECIFIC COMMENTS:

The following are the USAG Fort Carson's responses to the concerns raised by the SHPO in correspondence dated February 28, 2011 (CHS #58008) regarding the 2010 2-4 BCT "Warhorse Rampage" Training Exercise.

Comment #1: 5LA2236: *The documentation provided suggests that the site was originally recorded by Carillo and Mead on 7/8/1984; however, we only have record of a recording by Frizzel on 8/26/1983. We also have no documentation regarding the shovel probes that are referenced in this most recent reevaluation documentation. Are we missing documentation for this site? Additionally, the justification provided for the recommendation that this site is "not eligible" for the NRHP in the early 1980s was that it "does not meet age criteria." However, 25+*

years later, this complex now is older than 50 years. Perhaps it should be re-recorded in its entirety to current documentation standards and reassessed for NRHP eligibility?

Response #1: A full re-evaluation that meets current documentation standards was completed in 2014. We have received concurrence with the determination that the site is ineligible for the inclusion in the NRHP via correspondence dated August 10, 2016 (HC #69860). The site documentation completed by Carrillo and Mead in 1984 is included in Enclosure 4 – Supporting Documentation.

Comment #2: *5LA2317: The table provided entitled, "Warhorse Rampage, List of 39 Historic Properties Assessed and Re-evaluated" recommends a finding of not eligible for this site, but the site form recommends a finding of eligible. We would appreciate clarification of this discrepancy.*

Response #2: The 2010 re-evaluation stated that the cairn is "unique" and recommended that the cairn be considered eligible for inclusion in the NRHP under Criterion C. Otherwise, the site lacked integrity. It is the USAG Fort Carson's opinion that further investigations are warranted at the site, specifically the cairn, prior to a determination of eligibility.

Comment #3: *5LA2367: The documentation provided suggests that the site was originally recorded by Carillo 10/13/1983 and reevaluated by Sanders on 6/15/1987 however, we only have the Carillo documentation.*

Response #3: The site documentation completed by Sanders in 1987 is included in Enclosure 4 – Supporting Documentation. In subsequent correspondence dated February 29, 2012 (CHS #60388), you concurred with our determination of "not eligible" for inclusion in the NRHP.

Comment #4: *5LA3129: Although we have concurred as noted above, that this site is eligible for the NRHP, upon review of this most recent documentation, we are concerned at the lack of detail and question the adequacy and thoroughness of documentation from the 2003 PCMS Reevaluation Project, when it was recommended as not eligible for the NRHP. Can the Army explain how these two recordings of the same site are so drastically different in their interpretations and recommendations? Also, we received a reevaluation form for 5LA3187 (now subsumed under 5LA3129), but not for 5LA3222 (also now subsumed under 5LA3129). As 5LA3222 is now recommended to be subsumed under 5LA3129, we would greatly appreciate receiving a reevaluation form that explains this.*

Response #4: The USAG Fort Carson agrees that the adequacy and thoroughness of the 2003 PCMS Re-evaluation Project should be questioned. We are unable to offer insight as to the reason for the drastic differences between the 2003 recording and the 2010 recording. The 2010 site documentation did state that "all prehistoric features were missed during original recording efforts or have only recently begun to expose on the modern ground surface." If the latter is truly the case, then these features may not have been visible during the 2003 re-evaluation effort. The re-evaluation form for 5LA3222 that explains that this site has been merged into 5LA3129 is included in Enclosure 4 – Supporting Documentation.

Comment #5: *5LA3221: We recommend that this site be recorded in its entirety to current documentation standards as it was last fully documented in 1984. The 1998 documentation states, "A very small portion of the southern edge of the site is within the current survey area. We did not intensively examine the site."*

Response #5: A full re-evaluation that meets current documentation standards was completed in 2014. We have received concurrence with the determination that the site is ineligible for NRHP via correspondence dated August 10, 2016 (HC #69860).

Comment #6: *5LA3240: We recommend that this site be recorded in its entirety to current documentation standards as it was last fully documented in 1984. Documentation standards have changed significantly since this site's original recording. Additionally, important resources like the National Register Bulletin "How to Apply the National Register Criteria for Evaluation" were published after this site was originally recorded. We believe that recording this site in its entirety to current documentation standards will allow the Army to better justify its determination of eligibility for the site and perhaps help with its future management.*

Response #6: Although listed as an impacted site in the AAR, according to the Colorado Cultural Resource Survey Site or Property Reevaluation Form and site map submitted as part of the AAR documentation, this site was not entered, or otherwise impacted, during the 2010 training exercise. Baseline monitoring was completed at the site on December 2, 2014; the monitors did not note any impacts related to military training. The Fort Carson CRM agrees that the site should be re-evaluated and documented to current standards, but this is not a program priority. Protection and monitoring on a cyclic basis will continue until a re-evaluation can be completed.

Comment #7: *5LA3254: Our office had not received consultation correspondence or site documentation for the excavation that was conducted at this site in 2000 until this most recent submittal. Why was this excavation conducted at the site? Was Section 106 consultation conducted with our office, Tribes, or other consulting parties prior to the excavation at the site? The material provided in this most recent submittal provides only the Excavation Unit Form (perhaps developed by NMSU researchers?) and not site form or recommendation of eligibility. We also do not have any report of the work that conducted at this site in 2000 (Kuehn et al.). The 2010 reevaluation references the 2000 recommendation for this site as not eligible for the NRHP. However, as we never received this documentation, we are unable to concur with this recommendation. It is important to note that the revised Section 106 regulations specifically state, "Alteration or destruction of an archaeological site is an adverse effect, whether or not recovery of archaeological data from the site is proposed." As such, we believe that the Army should have consulted with our office, Tribes, and other consulting parties prior to authorizing this work to take place at 5LA3254.*

Response #7: After extensively researching our records, a memorandum for record (MFR) entitled, *After Action Report – Protected Archaeological Sites*, dated 27 August 1999 and signed by Stephen Chomko, states that impacts related to military training at site 5LA3254 had been noted during an after action inspection of 86 protected sites. Chomko noted that a single tracked vehicle entered the site from the south knocking down two 30-foot sections of protection fence and driving over the eastern half of structure, then proceeded to drive out the northeast side of the site damaging two additional sections of the protection fence. Chomko recommended test excavations should be conducted in the impacted areas of the site to determine the amount of damage to buried cultural deposits.

In 2000, archaeological investigations were conducted by David Kuehn Consulting and New Mexico State University at site 5LA3254 in order to assess the impact from military training and to characterize the subsurface context of archaeological materials within those impacted areas. Based on the results of evaluative testing, combined with the general lack of cultural materials present on the surface or in buried cultural contexts, the site was recommended to be ineligible

for inclusion in the NRHP (Kuehn and Lynch 2007). Site documentation associated with the 2000 testing effort is included in Enclosure 4 – Supporting Documentation. The report of investigations (Kuehn and Lynch 2007) is included on the compact disc (CD).

Ms. Kolise was unable to find documentation in our files that Section 106 consultation had been completed in regards to potential effects from military training or the 2000 evaluative testing effort for this specific site; but, this is not uncommon for projects that occurred 16 years ago. Therefore, we are unable to definitely state if Section 106 consultation was conducted with the SHPO, culturally-affiliated Tribes, and other consulting parties.

None of the investigations conducted extensive archival research. Although test excavations near and within both features did not indicate the presence of an intact, buried cultural deposits, these units do not appear to have been excavated to bedrock or culturally sterile subsoil. The site is scheduled for re-evaluation in fiscal year (FY) 2017.

Comment #8: *5LA3332: We recommend that this site be recorded in its entirety to current documentation standards as it was last fully documented in 1984. We would also greatly appreciate having the documentation of the shovel probes that were placed at the site. Documentation standards have change significantly since the site's original recording. Additionally, important resources like the National Register Bulletin "How to Apply the National Register Criteria for Evaluation" were published after this site was originally recorded. We believe that recording this site it its entirety to current documentation standards will allow the Army to better justify its determination of eligibility for the site and perhaps help with its future management.*

Response #8: Although listed as an impacted site in the AAR, according to the Colorado Cultural Resource Survey Site or Property Reevaluation Form and site map submitted as part of the AAR documentation, this site was not entered, or otherwise impacted, during the 2010 training exercise. A full re-evaluation that meets current documentation standards was completed in 2012. In correspondence dated April 13, 2012 (CHS #60388), you concurred with our determination of "not eligible" for inclusion in the NRHP.

Comment #9: *5LA3421: We have concurred, as noted above, that this site is eligible for the NRHP. This site has been the subject of considerable research over the years and clearly represents a very important site on the PCMS. While we appear to have some of the documentation for this site, we do not have any report of the work that was conducted at this site in 2000 (Kuehn et al.). Our records indicate that this is not the first impact that has occurred at the site. A finding of adverse effect was made and concurred upon by our office in 2002 in response to correspondence from the Army regarding damage that had occurred to 5LA3421. We do not have record of any resolution of this adverse effect. In light of the ongoing physical damage that has occurred at the site, how does the Army propose to adequately protect this site in the future? Does the Army have plans to resolve the adverse effects that have occurred to the site?*

Response #9: After extensively researching our records, a memorandum for record (MFR) entitled, *After Action Report – Protected Archaeological Sites*, dated 27 August 1999 and signed by Stephen Chomko, states that impacts related to military training at site 5LA3421 had been noted during an after action inspection of 86 protected sites. Chomko noted that approximately seven tracked vehicles transected the site damaging approximately 25 sections of standing protection fence. Chomko recommended test excavations should be conducted in the impacted areas of the site to assess the amount of damage to buried cultural deposits.

In 2000, archaeological investigations were conducted by David Kuehn Consulting and New Mexico State University at site 5LA3421 in order to assess the impact from military training and to characterize the subsurface context of archaeological materials within those impacted areas. Based on the results of evaluative testing, the site was recommended as eligible for inclusion in the NRHP (Kuehn and Lynch 2007). Kuehn and Lynch (2007) further state that, while the military maneuvers had a demonstrable effect on surface soils, there was no conclusive evidence to suggest that subsurface cultural deposits were negatively impacted by these maneuvers. More testing was recommended, since the site could not be fully investigated due to time and funding constraints. Site documentation associated with the 2000 testing effort is included in Enclosure 4 – Supporting Documentation, while the report of investigations (Kuehn and Lynch 2007) is included on the CD.

In correspondence dated May 7, 2002, the USAG Fort Carson notified your office that a finding of "possible adverse effect" to 5LA3421 had occurred as a result of the military training impacts that were described in the aforementioned MFR. This notification further states that the USAG Fort Carson proposed to continue evaluative testing at site 5LA3421 to evaluate the nature and full extent of the site disturbance and archaeological data potential. Dependent upon the results of the continued evaluative testing, then the USAG Fort Carson would provide mitigation recommendations, as warranted. Your office concurred with our determination of effect and proposed evaluative testing of 5LA3421 on May 15, 2002.

Further evaluative testing was conducted at 5LA3421 by Fort Lewis College in 2002 (Charles et al. 2005). Charles et al. (2005) recommended that 5LA3421 is eligible for inclusion in the NRHP under Criterion D and suggested that only those portions of the site that had potential to yield significant archaeological data should be protected.

Ms. Kolise was unable to find additional documentation addressing proposed mitigation or resolution of adverse effect resulting from the previous military maneuvers.

In 2012, Seibert markers were installed around the perimeter of the site boundary in response to the impacts related to the 2010 2-4 BCT "Warhorse Rampage" Training Exercise. No recent vehicle entries or other military training impacts have been noted at the site since the 2010 training event.

36 CFR 800.16(i) defines the term "effect" as an "alteration to the characteristics of a historic property qualifying it for inclusion in or eligibility for the National Register." As specified in 36 CFR 800.5(a)(1), an adverse effect occurs when this alteration, either direct or indirect, has diminished the integrity of the historic property's location, design, setting, materials, workmanship, feeling, or association; and these may include reasonably foreseeable effects that may occur at a later date due to the undertaking, cumulative effects, or effects that are farther removed in distance. Based on all available documentation, including the testing and re-evaluation efforts and the baseline monitoring report, the integrity of the site has not been adversely effected by military maneuver training exercises, and no cumulative effects related to military training impacts have been noted at the site.

Comment #10: 5LA4950: *Prior to this most recent submittal, we never received or provided concurrence on the recommendation that this site is not eligible for the NRHP, which was made as part of a reevaluation effort in 2008 following the Bridger Fire. As such, our records do not reflect that it is not eligible, but rather, the field recommendation of eligible made on the 1987 documentation stating "the site should be protected as an excellent example of a distinct*

architecture pattern." We recommend that this site be recorded in its entirety to current documentation standards.

Response #10: Although listed as an impacted site in the AAR, according to the Colorado Cultural Resource Survey Site or Property Reevaluation Form and site map submitted as part of the AAR documentation, this site was not entered, or otherwise impacted, during the 2010 training exercise. A copy of the site documentation completed in 2008 as a part of the Bridger Wildland Fire After Action is included in Enclosure 4 – Supporting Documentation; the report of investigations is included on the CD. The site is scheduled to be re-evaluated in FY2017.

Comment #11: 5LA5421: *As there appears to be some confusion regarding the number of features at this site, we recommend that this site be recorded in its entirety to current documentation standards as it was last fully documented in 1984. We do not have record of the 1987 recording by Sanders. The current documentation does not adequately address why a site with at least 39 features would not be eligible for the NRHP.*

Response #11: Subsequent to this correspondence, the USAG Fort Carson has received concurrence with our determination of "not eligible" for inclusion in the NRHP in a letter dated October 29, 2012 (CHS #60388). As requested, a copy of the site documentation completed by Sanders in 1987 is included in Enclosure 4 – Supporting Documentation.

Comment #12: 5LA5723: *We recommend that this site be recorded in its entirety to current documentation standards as it was last fully documented in 1983. Documentation standards have changed significantly since this site's original recording. Additionally, important resources like the National Register Bulletin "How to Apply the National Register Criteria for Evaluation" were published after this site was originally recorded. We believe that recording this site in its entirety to current documentation standards will allow the Army to better justify its determination of eligibility for the site and perhaps help with its future management.*

Response #12: A full re-evaluation that meets current documentation standards was completed in 2011. In correspondence dated April 13, 2012 (CHS #60388), you concurred with our determination of "not eligible" for inclusion in the NRHP.

Comment #13: 5LA8071: *The original site recording recommends that the site be revisited and a more detailed site map be prepared. We agree with these recommendations and believe that this more detailed mapping and testing will further provide support for the determination of site eligibility.*

Response #13: A full re-evaluation that meets current documentation standards was completed in 2014. We have received concurrence with the determination that the site is ineligible for the NRHP via correspondence dated August 10, 2016 (HC #69860).

Comment #14: 5LA9037: *The documentation for this site (both from 2000 and 2010) suggest that prior to any concurrence on an official determination of eligibility, this site has been subject to repeated military maneuver activities. This most recent site form states, "Based on the resource's location within a highly erosional environment, which has been exacerbated by 1980 and 1990 era maneuvers, there does not appear to be any potential for integrity of cultural deposits..." (emphasis added). Had this site possessed sufficient integrity to be eligible under Criterion D in the past, it is clear that it was not adequately protected. As such, a combination of sensitive environmental factors and military maneuver activities may have effectively rendered the site no longer eligible for the NRHP. Does the Army believe that this represents demolition*

by neglect? The original site recording recommends that the features at the site be tested to determine the extent of buried cultural deposits. We agree with this recommendation and believe that testing will further provide support for the determination of site eligibility.

Response #14: A full re-evaluation that meets current documentation standards was completed in 2014. In correspondence dated November 23, 2015 (HC #69195), you concurred with our determination of "not eligible" for inclusion in the NRHP, and further stated that you believed that the site's integrity had been adversely effected by cumulative impacts associated with years of military training along with increased erosion of largely intact cultural horizons.

As stated in the 2010 site documentation, there are numerous discrepancies within the site documentation and the report of investigations. Based on a thorough review of the site documentation, the site is located on an actively eroding landform with Greenhorn limestone exposing at the modern ground surface. The site has been greatly affected by sheet wash and channel erosion, as well as military training activities. The 2000 site documentation states that the site was recommended as eligible for the NRHP "based on the presence of intact buried cultural deposits within two features, and multiple diagnostic artifacts representing possible multiple cultural components." Yet, in the Prehistoric Archaeological Component Form and Survey Feature Form, Feature 1 was described as a deflated, eroding hearth with unmodified, burned sandstone in association that was exposed in a vehicle track. Feature 2 was described as a dark, ashy stain unaffected by erosion or military training activities with no associated fire-cracked rock, but several artifacts were noted in the vicinity of the stain. The recorders hypothesize that both features had 10 cm of deposition, although no shovel testing was conducted to verify this hypothesis. The recorders also suggested that both features needed to be tested to determine the extent of buried cultural deposits. The site itself was described as a low density lithic scatter with two associated thermal features, while the surficial artifact assemblage represents multiple occupations.

The 2010 and 2014 investigations failed to relocate Features 1 and 2, and it was posited that the features had been lost due to erosional processes that may have been exacerbated by military training activities that occurred on the site in the 1980s and 1990s. The USAG Fort Carson acknowledges that these potential thermal features should have been tested prior to their loss. We also acknowledge that the military training that occurred onsite prior to the 2000 recording, in combination with the highly erosional environment in which the site is located, adversely affected the integrity of the site, which is demonstrated in the 2000 site documentation. By the time the 2010 2-4 BCT "Warhorse Rampage" Training Exercise occurred, as well as the subsequent 2013 2-4 BCT "Warhorse Charge" Training Exercise and the 2015 1SBCT "Raider Focus" Training Exercise, what little remained of the site's integrity, i.e. Features 1 and 2, had already been lost.

Comment #15: 5LA9188: *We have concurred, as noted above, that this site is eligible for the NRHP. The table provided entitled, "Warhorse Rampage, List of 39 Historic Properties Assessed and Re-evaluated" states that a data recovery plan has been submitted with the reevaluation for this site however, we did not receive this plan. As the Army is proposing a finding of no adverse effect for the subject maneuver, it is unclear why data recovery (mitigation?) is being considered for this site.*

Response #15: Data recovery was recommended to recover any potentially significant data from features that are being adversely affected by natural erosional processes, not due to impacts from military training activities. Based on subsequent visits to the site in 2013 as part of the 2013 2-4 BCT "Warhorse Charge" Training Exercise after action review and in 2015 as part

of the baseline monitoring/current conditions assessment project, the USAG Fort Carson is proposing to continue monitoring the site to determine if erosional processes are affecting feature integrity, and if so, to determine rate of loss. With this data, we will be able to decide on the appropriate level of mitigation that may be needed at the site.

Comment #16: *Many of these sites were originally recorded 20-30 years ago. We generally recommend that sites be re-recorded in their entirety to current documentation standards when so much time has passed since their original recording.*

Response #16: As part of our archaeological site monitoring program, baseline monitoring, i.e. current conditions assessment, will occur at those sites that have not been visited in the past 20 years. Based on the information gathered during this investigation, the USAG Fort Carson will determine if a site needs to be re-evaluated and fully re-recorded to current documentation standards.

Comment #17: *Several of the site forms provided referenced previous reevaluations that have not been submitted to our office for concurrence. For example, for site 5LA3120, we were not provided the 2005 reevaluation documentation until it was included with this most recent 2010 Warhorse Rampage reevaluation documentation. Another example is site 5LA4951 which was apparently recorded in 2005, but we have no record of this documentation.*

Response #17: In 2016, the USAG Fort Carson, in collaboration with your office, completed the data rectification project as stipulated in 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 Operation Support Activities at Pinon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA), executed in April 2014. As part of the PCMS PA process, as well as the data rectification project, any site documentation and/or report of investigations should have been submitted to your office.

Comment #18: *Some of the documentation provided in this most recent submittal makes reference to a 2008 PCMS Bridger Fire Site Assessment Project. We do not have any record of having received documentation resulting from this project. We wonder if you would be able to provide us with a list of sites assessed following the fire, as well as an explanation regarding why these particular sites were chosen for re-evaluation.*

Response #18: The report of investigations associated with the 2008 PCMS Bridger Fire Site Assessment Project is included on the CD.

Comment #19: *We are unable to concur with the Army's overall determination of no adverse effect...As a result of the above concerns, we believe that the subject maneuver activity has resulted in **adverse effects** to historic properties.*

Response #19: After a thorough review of all associated documentation, the USAG Fort Carson agrees that the 2010 2-4 BCT "Warhorse Rampage" Training Exercise resulted in adverse effects to historic properties. As such, we propose to continue consultation to resolve for these adverse effects pursuant to 36 CFR 800.6.

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**Enclosure 2: 2013 2-4 BCT “Warhorse Charge” Training Exercise, Piñon Canyon
Maneuver Site (PCMS), February-March 2013**

BACKGROUND:

Via correspondence dated June 27, 2013, the USAG Fort Carson initiated consultation with the Advisory Council on Historic Preservation (ACHP), Colorado State Historic Preservation Officer (SHPO), culturally-affiliated Native American Tribes, and other consulting parties concerning potential impacts to historic properties that resulted from the 2013 2-4 BCT “Warhorse Charge” Training Exercise that was held at the Piñon Canyon Maneuver Site (PCMS) in February-March 2013. This letter and accompanying After Action Report (AAR) state that 21 historic properties were entered by vehicles during the training event. The Fort Carson Cultural Resources Manager (CRM) determined that 11 of the 21 sites had no adverse effects, but additional investigations were needed to determine the extent of impacts at 9 sites. The USAG Fort Carson anticipated “initiating Section 106 consultation under 36 CFR 800.6, *resolution of effects*, intended to culminate in a Memorandum of Agreement (MOA) as specified in 36 CFR 800.6(c).

In correspondence dated July 12, 2013 (CHS #63119), the SHPO requested documentation conforming to 36 CFR 800.11(e), to include copies of the site documentation for the 21 sites, in order to complete the assessment and resolution of adverse effects pursuant to 36 CFR 800.5 and 36 CFR 800.6. This information was provided to the SHPO in correspondence dated September 18, 2013.

Via correspondence dated October 25, 2013, the USAG Fort Carson notified the ACHP, the SHPO, and the Tribes concerning a violation of the Archaeological Resources Protection Act (ARPA) that occurred at site 5LA5555. It was recently discovered to have graffiti traceable to the 2013 2-4 BCT “Warhorse Charge” Training Exercise. The letter stated that the investigation was still ongoing, and a Memorandum for Record (MFR) was forthcoming.

In correspondence dated October 31, 2013, the SHPO provided recommendations for improving site protection measures; suggested that evaluative testing should be completed to determine if intact, buried cultural deposits are present outside of defined features and/or artifact concentrations; and requested that future AAR documentation be limited to Colorado cultural resource survey forms. A copy of the 2007 documentation for site 5LA5484 was also requested. The SHPO agreed that the USAG Fort Carson’s recommendation for additional evaluative testing and mitigation was appropriate, and that consultation to resolve for adverse effects should continue.

In correspondence dated May 14, 2015, the USAG Fort Carson concluded that the consultation to resolve for adverse effects to historic properties associated with the 2013 2-4 BCT “Warhorse Charge” Training Exercise had been completed. The reasons stated included:

- 1) Execution 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 Operation Support Activities at Pinon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA) in April 2014;
- 2) Completion of the site marking effort in the primary maneuver box, as well as the addition of Seibert markers at several of the entered sites;

- 3) Creation and distribution of digital maps depicting the restricted areas for use in command and control systems;
- 4) Enhancement of cultural resources awareness training materials and the production of a cultural resources awareness video.

In correspondence dated June 16, 2015, the SHPO did not concur with the USAG Fort Carson's position that additional Section 106 consultation to resolve for adverse effects was not required due to the reasons stated above. The letter further stated that Section 106 consultation, including the development of a MOA, must be completed for this undertaking to resolve for those adverse effects to historic properties.

CURRENT FINDINGS:

In an effort to address concerns raised by the SHPO in correspondence dated June 16, 2015, Jennifer Kolise, PCMS Archaeologist, conducted a thorough review of all files and/or records associated with the 2013 2-4 BCT "Warhorse Charge" Training Exercise after action inspection of protected properties. Table 1 summarizes the site status at the time of the training event for the 22 sites discussed in the AAR and follow-up consultation, including determination of eligibility and physical protection measures; observations and recommendations made during the after action inspection; current site status, including determination of eligibility, physical protection measures, and date of baseline monitoring or re-evaluation; and updated findings and recommendations.

Since the initial consultation documentation:

- Four sites have been determined as ineligible for inclusion in the National Register of Historic Places (NRHP), for which the USAG Fort Carson has received concurrence from the SHPO;
- Sixteen sites have been determined as eligible for the NRHP, for which the USAG Fort Carson has received concurrence from the SHPO; and
- Two sites are considered "needs data."
- Of the 18 sites that are considered protected properties, all except 5LA5555 currently have physical protection measures, i.e. protection fence, Seibert markers, or boulders. In response to the 2013 2-4 BCT "Warhorse Charge" Training Exercise:
 - Additional Seibert markers were placed at the following entered sites in an effort to better protect these sites: 5LA3276, 5LA3421, 5LA5612, 5LA9188, 5LA09450, 5LA9298, 5LA10473, 5LA12254, 5LA12523, 5LA12524, and 5LA12581.
 - Additional Seibert markers and boulders were placed at 5LA2258 in consultation with the Jicarilla Apache Nation.
 - The following entered sites were marked: 5LA5484, 5LA9471, 5LA9472, and 5LA12687.
- Consultation was completed with four Tribes regarding the vandalism at site 5LA05555. An AR 15-6 investigation was completed; the legal review is included in Enclosure 4 – Supporting Documentation. Also in response to this incident, cultural resources

awareness training materials have been updated to specifically state the USAG Fort Carson's stance that graffiti will not be tolerated, anywhere, any time. In addition, a gate has been installed on the Hogback Access Road in order to better restrict access.

- More cultural resources awareness materials have been developed and include the Soldiers' Brief, a Cultural Resources Fact Sheet, Dos and Don'ts Pocket Card, the Cultural Resources section in the Environmental Battle Book, and the Cultural Resources Awareness Video.
- Adverse effects directly related to the 2013 2-4 BCT "Warhorse Charge" Training Exercise occurred at the following two sites: 5LA5555 and 5LA12687.
- Adverse effects related to cumulative military training impacts occurred at the following four sites: 5LA2258, 5LA3276, 5LA9037, and 5LA9298.
- Potential adverse effects due to natural erosional processes, and are not related to the 2013 2-4 BCT "Warhorse Charge" Training Exercise, are occurring at the following two sites: 5LA9188 and 5LA9450.
- The following four sites were also entered during the 2010 2-4 BCT "Warhorse Rampage" Training Exercise: 5LA3421, 5LA9188, 5LA9450, and 5LA9471.
- Site 5LA9037 was also entered during both the 2010 2-4 BCT "Warhorse Rampage" Training Exercise and the 2015 1st Stryker Brigade Combat Team's (1SBCT) "Raider Focus" Training Exercise.

USAG FORT CARSON'S RESPONSE TO SPECIFIC COMMENTS:

The following are the USAG Fort Carson's responses to the concerns raised by the SHPO in correspondence dated June 16, 2015 (HC #63119), regarding the 2013 2-4 BCT "Warhorse Charge" Training Exercise.

Comment #1: *...Army preliminarily identified adverse effects to 9 of the 21 archaeological sites and indicated that additional consultation would commence to develop "appropriate data recovery measures". Our records indicate that continued consultation to resolve the adverse effects and finalize mitigation pursuant to 36 CFR 800.6 has not occurred.*

Response #1: The June 2013 AAR and associated correspondence did state that 9 to 10 archaeological sites were adversely affected from the training maneuvers conducted in association with the 2013 2-4 BCT "Warhorse Charge" Training Exercise. Based on further review of the documentation recently conducted by Ms. Kolise in an effort to adequately address your comments, we have found errors and discrepancies, and are proposing to revise our original findings.

Ms. Kolise discerned that there is a misconception that recommendations for additional work made by the after action monitors equated to adverse impacts to the integrity of these sites stemming from the 2013 2-4 BCT "Warhorse Charge" Training Exercise. In addition, our correspondence dated September 18, 2013, stated that "*an explanation of why adverse effects were found applicable or inapplicable for each site breached are identified on the "Cultural Site After Action Assessment Forms";*" this statement does not accurately reflect the information recorded on these forms. The after action assessment forms only provided information regarding the types and severity of the maneuver damage observed, if any features were

impacted, if any artifacts were observed, and management recommendations. These forms did not address the application of the criteria for adverse effects in accordance with 36 CFR 800.5 for each of the entered sites. Table 1 lists all sites that were impacted by the 2013 2-4 BCT "Warhorse Charge" Training Exercise and includes site status at the time the training occurred, a summary of the observations and recommendations made during the after action monitoring, and revised proposed resolutions for each site.

Comment #2: *According to your late-October letter, Army was revising its earlier AAR submission and associated documentation for resubmission to include the ARPA finding. Our records indicate that we have not received the revised documentation.*

Response #2: The USAG Fort Carson has been remiss in following up to our letter dated October 25, 2013, which informed your office of the vandalism that occurred at site 5LA05555. Documentation regarding this incident is included in Enclosure 4 – Supporting Documentation.

Comment #3: *...we disagree with your finding that additional Section 106 consultation is not required for the affected archaeological sites as the terms 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 Pinon Canyon Maneuver Site, Fort Carson, Colorado do not set forth a process to resolve adverse effects that occurred prior to its April 23, 2014 execution date. The intent of the above referenced programmatic agreement (PA) is not in the "resolution of adverse effects" as indicated by your May 14th letter; rather, its purpose is to "govern the implementation of a particular program" pursuant to 36 CFR 800.14(b) by establishing exempted undertakings and developing a programs for monitoring and inspecting of "protected properties"...As such, Section 106 consultation must continue.*

Response #3: The USAG Fort Carson acknowledges that the intent of the PCMS PA is not to resolve for adverse effects to historic properties that may have resulted from the 2013 2-4 BCT "Warhorse Charge" Training Exercise or any other undertaking. As stated in your correspondence, the intent of the PCMS PA is to streamline the Section 106 consultation process by establishing exempted undertakings and implement programs for the protection and monitoring of historic properties. Therefore, we agree that the stipulations set forth in the PCMS PA do not constitute mitigation to resolve for adverse effects to historic properties, and Section 106 consultation will continue to resolve for these adverse effects.

Comment #4: *Consequently, we believe that Army must complete Section 106 consultation for the undertaking and this must include the development of a Memorandum of Agreement to govern the resolution of adverse effects pursuant to 36 CFR 800.6 for the affected archaeological sites identified in the AAR.*

Response #4: The USAG Fort Carson agrees with the above comment. Section 106 consultation will continue to resolve for adverse effects to archaeological sites identified in the AAR, which includes developing a Memorandum of Agreement to govern the resolution of these adverse effects pursuant to 36 CFR 800.6.

Enclosure 3: 2015 1SBCT “Raider Focus” Training Exercise, Piñon Canyon Maneuver Site (PCMS), May-June 2015

BACKGROUND:

Via correspondence dated September 16, 2015, the USAG Fort Carson initiated consultation with the Colorado State Historic Preservation Officer (SHPO), culturally-affiliated Native American Tribes, and other consulting parties concerning potential impacts to protected properties associated with the 2015 1st Stryker Brigade Combat Team’s (1SBCT) “Raider Focus” Training Exercise that was held at the Piñon Canyon Maneuver Site (PCMS) in May-June 2015. This letter and accompanying After Action Report (AAR) stated that 60 protected sites had been entered by vehicles during the training event. The USAG Fort Carson requested concurrence with determinations of eligibility for 24 of the 60 protected sites. In addition, the Fort Carson Cultural Resources Manager (CRM) proposed a determination of “no adverse effect to historic properties” in accordance with 36 CFR 800.5(d).

In correspondence dated November 23, 2015 (HC #69195), the SHPO provided concurrence with the USAG Fort Carson’s determinations of eligibility for the 24 sites and provided concurrence with the determination of effect for 23 of these 24 sites. More information regarding cumulative impacts to 36 of the 60 protected sites was requested. For site 5LA9037, the SHPO recommended a finding of “adverse effects to a historic property” due to the cumulative effects associated with previous military training exercises.

CURRENT FINDINGS:

Tables 1 and 2 summarize the site status at the time of the training event for the 60 sites discussed in the AAR, including determination of eligibility and physical protection measures; observations and recommendations made during the after action inspection; current site status, including determination of eligibility, physical protection measures, and date of baseline monitoring or re-evaluation; and updated findings and recommendations. Table 1 includes the 37 sites for which consultation is ongoing regarding the determinations of effect and/or determinations of eligibility. Table 2 lists the 23 sites that do not require further consultation, since the SHPO has provided concurrence with the determinations of effect and/or determinations of eligibility in correspondence dated November 23, 2015 (HC #69195).

To summarize:

- Twenty-four of the 60 protected sites have been determined as ineligible for inclusion in the National Register of Historic Places (NRHP), for which the USAG Fort Carson has received concurrence from the SHPO;
- Twenty-four sites have been determined as eligible for the NRHP, for which the USAG Fort Carson has received concurrence from the SHPO; and
- Twelve sites are considered “needs data,” 11 of which are currently being re-evaluated.
- Of the 60 protected sites, only 10 had physical protection measures, such as Seibert markers or protective fencing, in place prior to the training exercise.
- Adverse effects related to previous (and cumulative) military training impacts have occurred at site 5LA9037, which had noted impacts associated with the 2010 2-4 BCT

"Warhorse Rampage" Training Exercise and the 2013 2-4 BCT "Warhorse Charge" Training Exercise.

- Adverse effects due to neglect are occurring at site 5LA5829, Bar VI Ranch.
- Site 5LA4940 was also entered during the 2010 2-4 BCT "Warhorse Rampage" Training Exercise.
- Site 5LA9037 was also entered during the 2010 2-4 BCT "Warhorse Rampage" Training Exercise and the 2013 2-4 BCT "Warhorse Charge Training Exercise.

USAG FORT CARSON'S RESPONSE TO SPECIFIC COMMENTS:

The following are the USAG Fort Carson's responses to the specific concerns raised by the SHPO in correspondence dated November 23, 2015 (HC #69195), regarding the 2015 1SBCT "Raider Focus" Training Exercise.

Comment #1: *While we concur that site 5LA9037 is no longer eligible for listing to the National Register, we request additional information regarding the apparent destruction of cultural features within this site. In brief, site 5LA9037 was identified nearly 15 years ago during a large-scale inventory of the PCMS and, at that time, it was determined through consultation with our office to be eligible for listing to the National Register under criterion D. It now appears that subsequent military training has impacted the landform effectively destroying two cultural features (hearth and stain) that were thought to contain significant information...We believe that the removal of these features over the course of many years of military training along with increased erosion of largely intact cultural horizons may represent cumulative adverse effects associated with USAG's use of the PCMS.*

Response #1: The USAG Fort Carson does not have any correspondence that the determination of eligibility for 5LA9037 had been concurred upon by your office prior to 2011. In correspondence dated February 28, 2011 (CHS #58008), you recommended that the site be treated as "needs data" until evaluative testing to determine the extent of buried cultural deposits could be completed. This effort was completed in 2014.

As stated in the 2010 site documentation that was provided to your office as part of the 2010 2-4 BCT "Warhorse Rampage" Training Exercise, there are numerous discrepancies within the site documentation and the report of investigations. Based on a thorough review of the site documentation, the site is located on an actively eroding landform with Greenhorn limestone exposing at the modern ground surface. The site has been greatly affected by sheet wash and channel erosion, as well as military training activities. The 2000 site documentation states that the site was recommended as eligible for the NRHP "based on the presence of intact buried cultural deposits within two features, and multiple diagnostic artifacts representing possible multiple cultural components." Yet, in the Prehistoric Archaeological Component Form and Survey Feature Form, Feature 1 was described as a deflated, eroding hearth with unmodified, burned sandstone that was exposed in a vehicle track. Feature 2 was described as a dark, ashy stain unaffected by erosion or military training activities with no associated fire-cracked rock, but several artifacts were noted in the vicinity of the stain. The recorders hypothesized that both features had 10 cm of deposition, although no shovel testing was conducted to verify this hypothesis. The recorders also suggested that both features needed to be tested to determine the extent of buried cultural deposits. The site itself was described as a low density

lithic scatter with two associated thermal features, while the surficial artifact assemblage represents multiple occupations.

The 2010 and 2014 investigations failed to relocate Features 1 and 2, and it was posited that the features had been lost due to erosional processes that may have been exacerbated by military training activities that have occurred on the site in the 1980s and 1990s. The USAG Fort Carson acknowledges that these potential thermal features should have been tested prior to their loss. We also acknowledge that the military training that occurred onsite prior to the 2000 recording, in combination with the highly erosional environment in which the site is located, adversely affected the integrity of the site, which is demonstrated in the 2000 site documentation. By the time the 2010 2-4 BCT "Warhorse Rampage" Training Exercise occurred, as well as the subsequent 2013 2-4 BCT "Warhorse Charge" Training Exercise and the 2015 1SBCT "Raider Focus" Training Exercise, what little remained of the site's integrity, i.e. Features 1 and 2, had already been lost.

Comment #2: *...21 of the 47 previously recorded sites – or 44.7% of the protected properties under the terms of the current PA – show evidence of cumulative impacts associated with "past training maneuver" in addition to disturbances attributed to the current undertaking. While current impacts to 29 of the remaining 36 sites...appear minor, we do not believe that your effects analysis provides sufficient information for us to concur on your recommended finding of no adverse effect...Consequently, we request additional information of possible effects that may include, but are not limited to, future restoration, changes in erosion or deposition, and incremental impacts that are documented following each brigade training exercise.*

Response #2: The USAG Fort Carson does not anticipate to conduct any land rehabilitation activities within the remaining 36 sites. With regards to changes in erosion or deposition, no major changes that may adversely affect the sites by physically altering the landscape are expected. Eight of these 29 sites (5LA4399, 5LA4407, 5LA5008, 5LA6125, 5LA9184, 5LA12588, 5LA12589.1, and 5LA12593) are considered "needs data" sites; these sites are scheduled for re-evaluation in FY2016 or FY2017. Site 5LA4406 has been determined as ineligible for inclusion in the NRHP, for which the USAG Fort Carson has received concurrence in correspondence dated September 15, 2013 (CHS #64524), prior to the 2015 1SBCT "Raider Focus" Training Exercise. The site was also re-evaluated in 2014; in correspondence dated August 10, 2016 (HC #69860), you concurred that the site is still considered ineligible. For the remaining sites, our site monitoring program is designed to detect and quantify changes to the site that result from natural processes. As more data is gathered during these monitoring visits, we will be better able to address cumulative impacts at these sites. Previous impacts associated with military maneuvers have been noted at 9 of these 29 sites (5LA4406, 5LA4991, 5LA5008, 5LA8309, 5LA8620, 5LA9184, and 5LA12604). No adverse effects due to cumulative impacts were noted at these nine sites during the after action monitoring. The USAG Fort Carson cannot reasonably foresee impacts associated with potential future brigade training exercises. Only two sites, 5LA4940 and 5LA9037, have previous impacts that can be associated with a known brigade training exercise; and neither of these two sites are part of the 29 sites discussed in this comment. The USAG Fort Carson stands by our determination of effect that "no adverse effects" have occurred at these protected sites.

Comment #3: *5LA4367 – Enclosure 1 notes that "georeferencing the 1987 site map with location of the tracks to determine if any features may have been impacted was inconclusive." As per 36 CFR 800.5(a)(1), adverse effects need not be conclusive but are considered to occur when an undertaking may affect (or may have affected) the qualities or characteristics that qualify the property as National Register eligible.*

Response #3: The archaeologists who conducted the after action inspection did not observe any features or other cultural materials in the tracks. In an effort to determine whether the vehicles did or did not drive over the features, we attempted to georeference all site maps to show the relationship of the features to the track locations. Unfortunately, the site boundaries as depicted on the 1987 site map does not match the site boundaries in our GIS layer. Therefore, we do not have this additional level of evidence to support our observations. A baseline monitoring/conditions assessment visit will be conducted at this site during the 2016 field season to ascertain current conditions of the overall site and features and to update, as necessary, the site boundary, site location, and feature locations. The USAG Fort Carson requests to reserve further consultation regarding the determination of effect at 5LA4367 until after the baseline monitoring/conditions assessment has been completed.

Comment #4: *5LA4717 – Enclosure 2 does not provide adequate photographic documentation. We request that you provide supplementary photographs showing impacts to Feature 1 (dugout). Currently, we do not believe we have sufficient information to provide further comment regarding possible effects to this National Register-need data site.*

Response #4: Supplementary photographs of Feature 1 and a map of photograph locations are included in Enclosure 4 – Supporting Documentation. Ms. Kolise visited the site on July 1, 2016, to take the requested supplementary photographs of Feature 1, and further assess the observations made by the after action monitor. The vehicles did not drive on, or through, Feature 1 (dugout). The wall fall to which the after action monitor referred in his notes is the occasional, displaced stones that are scattered approximately two meters from the walls of Feature 1. In addition, we have recently received concurrence from your office that the site is ineligible for the NRHP (HC #69860; August 10, 2016).

Comment #5: *5LA4940 – This National Register-eligible site was affected during the Warhorse Rampage training and we request an update to the status of the USAG's Section 106 consultation for this undertaking; please see our second to last comment below.*

Response #5: The status of the Section 106 consultation for the 2010 2-4 BCT "Warhorse Rampage" Training Exercise is included in Enclosure 1.

Comment #6: *5LA4972 – Enclosure 1 notes that Feature 1 (foundation) was driven through but that USAG is uncertain if "impacts to features are a result of this training event or previous ones." Insufficient information is available to provide comment on possible effects to this National Register-need data site...*

Response #6: The 1987 recorders described the site 5LA4972 as a ca. 1915 historical homestead comprised of three features: Feature 1, stone and wood post foundation; Feature 2, probable dugout with a poorly defined baseline and corner supports of stone slabs; and Feature 3, a rock pile of unknown function. The artifact assemblage consisted of window glass; colorless, aqua, and amber bottle glass fragments; whiteware sherds; and a tobacco tin. The recorders noted tank tracks on the site, and that the area in general had been used for mechanized maneuver training. The site was recommended as ineligible for inclusion in the NRHP due to lack of integrity and the low probability for buried cultural deposits. Since the USAG Fort Carson had no record that your office had concurred with our determination of eligibility, we requested concurrence during the consultation process associated with the development of the PCMS Programmatic Agreement. In correspondence dated August 11, 2014 (CHS #65835), you stated that the site should be considered as "needs data" until its

significance and integrity have been fully re-evaluated, as it had been over twenty years since the site had been recorded. As part of this re-evaluation, you requested that archival research be conducted to address Criteria A-C and that subsurface testing be conducted to address Criterion D. The site is scheduled for re-evaluation in FY2016.

In response to your comments, Ms. Kolise visited the site on July 1, 2016, to assess the condition of the site. The Stryker tracks are barely visible. The site is located within a prairie dog colony; a large burrow is located in the center of Feature 1 (structure). Although the AAR states that it is "uncertain if impacts to features are a result of this training event or previous ones" based on the observations made by the monitors, the site and associated features appear to be in the same condition as described in the 1987 site documentation and as depicted on the site map and feature planview. All features were relocated, as well as the milled lumber and rock piles that were depicted on the 1987 site map, but not assigned feature numbers. One set of Stryker tracks transects the eastern portion of Feature 1 (structure). Unlike the western and central portions, this portion of the feature is ill-defined. The westernmost Stryker tracks drove through the scattered mill lumber and passed just west of Feature 2 (depression, probable dugout). The milled lumber depicted on the 1987 site map was relocated during the recent site visit. The artifact assemblage observed by Ms. Kolise is comparable to what was observed by the original recorders, and included aqua, amber, solarized amethyst, and olive bottle glass fragments; window glass; tin cans; and whiteware sherds. Supplementary photographs and a map of photograph locations are included in Enclosure 4 – Supporting Documentation. Based on Ms. Kolise's assessment, the USAG Fort Carson still stands by its original determination that the site has not been adversely affected by the 1SBCT "Raider Focus" Training Exercise.

Comment #7: *5LA6130 – Enclosure 2 (map) does not include the prehistoric archaeological component that was added to this historic site in 1997. Consequently, it is unclear what, if any, impacts have occurred to this portion of the site which we now request you provide.*

Response #7: The provided map does depict the entire site boundary for 5LA6130. The prehistoric component is a disperse lithic scatter, measuring 65 meters north-south by 49 meters east-west. There are no features associated with the prehistoric component. The 1997 recording recommended that the site was ineligible for inclusion in the National Register of Historic Places (NRHP) due to the low potential for the site to yield significant data. In correspondence dated August 11, 2014 (CHS #65835), you recommended that the site be considered "needs data" until its "National Register significance and integrity had been fully considered," suggesting that subsurface testing be completed to adequately address the site under Criterion D. Site 5LA6130 is scheduled to be re-evaluated in FY2016.

Comment #8: *5LA7418 – Enclosure 1 indicates that an unrecorded stone feature, possible relating to a recently constructed "military defensive blind" that was noted in an earlier recording, was built within a National Register-need data site. Impacts such as these may certainly have deleterious effects on the site's data potential and National Register significance. We request supplemental information in this regard.*

Response #8: Site 5LA7418 is currently being re-evaluated. The 2003 site documentation hypothesized that the stacked tabular sandstone feature may have been a "military defensive blind" constructed in the last five years. The 2003 recorders surmised this, stating that the feature had not been identified during the original recording in 1997 and must have been a recent construct. While the original recorders did not note this feature, it should not be assumed that the feature was constructed after the 1997 recording. The after action monitors described the feature as a stone wall, probable segment of a historical fence. Since the 2003 recorders

did not depict the location of the "military defensive blind" on the site map, it cannot be positively stated that the unrecorded stone wall observed in 2015 is the same feature as the "military defensive blind" described in the 2003 site documentation. The monitors did not note any military-related features. It is posited that the 2003 recorders misidentified this feature as a "recent military defensive blind." The current re-evaluation will assist in ascertaining the nature of the feature.

Comment #9: *5LA9283 – Enclosure 2 (map) shows military tracks immediately adjacent to Feature 2 (an Aphishipa stone structure) but does describe whether the thermal feature noted immediately outside of the feature within the 2000 inventory was impacted by the 1SBCT training. We request clarification on its status.*

Response #9: No evidence of a thermal feature, or any cultural deposits, were noted in the tracks adjacent to Feature 2 during the after action inspection of 5LA9283. A thorough review of the 2000 site documentation noted a few inconsistencies. The statement of significance section of the Management Data Form states that "...a thermal feature exists just outside of the structure, while the Prehistoric Archaeological Component form states that "No thermal features were noted." The Survey Feature Form for Feature 2 describes the soil within the feature as "distinctly darker than the surrounding soil" with a "strong presence of fire cracked rock." The form further states that there "appears to be an activity area with thermal features to the west." Yet according to the site map, the only features located west of Feature 2 are three bedrock metates (Feature 5), not thermal features. In addition, no Survey Feature Forms were completed for thermal features. The report describes Feature 2 as having "soil staining and fire cracked rock present on the interior and immediately to the west" (Owens et al. 2002: 312). The thermal feature outside the feature that is referenced in the Management Data Form is actually the dark soil with fire-cracked rock that was described within Feature 2 on the Survey Feature Form. The thermal features to the west of Feature 2, as described within the Survey Feature Form, is actually Feature 5, the three bedrock metates. Based on the observations made during the after action inspection and the feature as described in the site documentation and associated report of investigations, the thermally-altered soil associated with Feature 2 was not impacted by the 2015 1SBCT "Raider Focus" Training Exercise.

Comment #10: *Our second to last comment is a request for clarification regarding the status of the Section 106 consultation for the 2nd Brigade Combat Team (2 BCT) "Warhorse Rampage" training exercise that occurred between July 16 and August 13, 2010...and as we could find no indications in our files as to whether Section 106 consultation was ever concluded, we respectively request that you provide files and/or records documenting this consultation was satisfactorily resolved.*

Response #10: Based on a thorough review of our records, we have determined that the Section 106 consultation has not been concluded for the 2010 2-4 BCT "Warhorse Rampage" Training Exercise. Please see Enclosure 1 for more details regarding this training exercise.

Comment #11: *Our final comment is in regards to the nature of USAG compliance with Section 106. The number of site breaches documented by this undertaking clearly calls into question the effectiveness of the site avoidance stipulations that form the basis of the PCMS training PA. Our office believes the issues detailed above necessitate greater diligence by your agency or perhaps a reconsideration of alternatives...Moreover, issues relating to Army's timely fulfillment of its Section 106 responsibilities must be addressed; both the 2010 2BCT training (noted above) as well as the 2013 2/4 BCT training may require additional consultation to complete the requirements of Section 106. While we recognize that forward progress has been made in*

terms of historic property protection, negative impacts to resources and delayed consultation problems continue. In consideration of the above concerns, a discussion among the signatory parties is likely needed to address broader compliance issues.

Comment #11: The USAG Fort Carson agrees that site protection stipulations as outlined in the PCMS PA need to be reassessed. As stated in the "Lessons Learned" section of the AAR, we acknowledged that the administrative policies that are in place within the lettered TAs do not adequately protect those sites located along the canyon rims. Therefore, these sites will need physical protection measures, such as Seibert markers. Another lesson learned discussed in the AAR concerned those sites that are considered to be protected due to the natural terrain. The Stryker is capable of accessing areas that are typically inaccessible by the Bradley and other similar tracked vehicles; therefore, the USAG Fort Carson needs to reassess which sites are considered terrain protected and add physical protection measures to those that are not truly terrain protected. Only nine sites that had physical protection measures, such as Seibert markers or fencing, in place were entered.

The USAG Fort Carson acknowledges that Section 106 has not been concluded for the 2010 2-4BCT "Warhorse Rampage" Training Exercise or the 2013 2-4BCT "Warhorse Charge" Training Exercise; therefore, further consultation is required to come to a mutually-agreeable resolution. Enclosures 1 and 2 include the USAG Fort Carson's response to your comments on these training exercises.

We request to schedule a meeting to discuss your concerns regarding this exercise, as well as the 2010 and 2013 brigade-sized training exercises, site protection measures, and consultation in general.



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GCO

James A. Lessard
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Department of the Army
Headquarters, United States Army Garrison, Fort Carson
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Fort Carson, Colorado 80913

MAR 01 2018

Re: Past Brigade Training Exercises at the Piñon Canyon Maneuver Site (PCMS) (HC #71348)

Dear Mr. Lessard:

Thank you for your correspondence dated January 18, 2018 and received on January 29, 2018 by our office regarding the review of the above-mentioned projects under Section 106 of the National Historic Preservation Act (Section 106). Specifically, this review is provided for compliance of the following training exercises that have been conducted at PCMS: the 2010 2-4 Brigade Combat Team (BCT) "Warhorse Rampage" Training Exercise; the 2013 2-4 "Warhorse Charge" Training Exercise; and the 2015 and 2017 1st Stryker BCT (1SBC1) "Raider Focus" Training Exercises, with the latter held at PCMS between April 11 and May 9, 2017. Delays in the review of these exercises from their original submissions, as well as a November 8, 2016 request for review of all exercises, has resulted from a number of factors that include staffing changes at Army and SHPO, debate regarding compliance definitions between Army and SHPO, and varying workloads. In an effort to resume consultation, we provide the following comments.

The Army has determined the area of potential effects [36 CFR 800.16(d)] (APE) for training exercises at PCMS to include all lands within the exterior boundary of the PCMS reservation. This broad definition covers the extent of possible direct effects to any historic properties that may occur as a result of Army training exercises.

In order to conduct a reasonable and good faith identification effort, Army conducts monitor identification following training exercise activities, per Stipulation IV of the 2014 PA. Per Stipulation I.B of the 2014 PA, we recommend that any previously unevaluated (or "needs data") properties that are not environmentally or administratively protected per Stipulation III.A of the PA, be evaluated for NRHP eligibility and assessed for adverse effects.

We concur with your determination of eligible for listing to the National Register of Historic Places (NRHP) for the following historic properties: 5LA.3459, 5LA.4407, 5LA.5008 and 5LA.12593.

We concur with your determination of not eligible for listing to the NRHP for the following properties: 5LA.3112, 5LA.3114, 5LA.3136, 5LA.4972, 5LA.6130, 5LA.7418, 5LA.9184, 5LA.9283 and 5LA.12589.

Following our review of the documentation detailing the after action review (AAR) of the training exercises, we concur with your finding of no historic properties affected [36 CFR 800.4(d)(1)] for the following properties: 5LA.2236, 5LA.2349, 5LA.2367, 5LA.2435, 5LA.3048, 5LA.3112, 5LA.3136, 5LA.3221, 5LA.3332, 5LA.3423, 5LA.4406, 5LA.4717, 5LA.4972, 5LA.5290, 5LA.5421, 5LA.5659, 5LA.5660, 5LA.5723, 5LA.6130, 5LA.7418, 5LA.8071, 5LA.9184, 5LA.9200, 5LA.9283 and 5LA.12589.

We concur with your finding of no adverse effect [36 CFR 800.5(d)(1)] on historic properties for the following: 5LA.2289, 5LA.2305, 5LA.2313, 5LA.2316, 5LA.2366, 5LA.2403, 5LA.3129, 5LA.3144, 5LA.3181, 5LA.3240, 5LA.3302, 5LA.3322, 5LA.3411, 5LA.3420, 5LA.3421, 5LA.3459, 5LA.3491, 5LA.3547, 5LA.4388, 5LA.4431, 5LA.4432, 5LA.4940, 5LA.4951, 5LA.5235, 5LA.5249, 5LA.5283, 5LA.5484, 5LA.5552, 5LA.5554, 5LA.5603, 5LA.5612, 5LA.6101, 5LA.6103, 5LA.6107, 5LA.6770, 5LA.7341, 5LA.7351, 5LA.8309, 5LA.8620, 5LA.9186, 5LA.9188, 5LA.9281, 5LA.9450, 5LA.9471,

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5LA.9472, 5LA.9611, 5LA.11429, 5LA.12254, 5LA.12518, 5LA.12523, 5LA.12524, 5LA.12581, 5LA.12592, 5LA.12593 and 5LA.12605.

We concur with your finding of adverse effect [36 CFR 800.5(d)(2)] for the following resources: 5LA.2258, 5LA.2302, 5LA.2320, 5LA.3120, 5LA.3124, 5LA.3276, 5LA.4367, 5LA.5555, 5LA.5829, 5LA.5830, 5LA.5832, 5LA.7471, 5LA.8622, 5LA.8694, 5LA.9037 and 5LA.12687. Per Stipulation IV of the 2014 PA, Army will consult with SHPO to resolve these adverse effects in accordance with 36 CFR 800.6(b) regulations. Our office looks forward to consulting on measures to resolve these adverse effects.

In addition to the concurrence statements we have provided above, there are a number of recommended determinations and findings by Army for which we were unable to provide our concurrence. Please review the following and provide our office an opportunity to consult further.

We do not concur with your determination of not eligible for properties 5LA.6125 and 5LA.13528. As indicated by the resource documentation forms, site 5LA.6125 and 5LA.13528 have incomplete information to make a determination and we recommend a finding of "needs data" with the property managed as eligible for listing to the NRHP.

For sites 5LA.2317, 5LA.3153, 5LA.3300, 5LA.3208, 5LA.3254, 5LA.3384, 5LA.4399, 5LA.4430, 5LA.4437, 5LA.4950, 5LA.5008, 5LA.5348, 5LA.5375, 5LA.5554, 5LA.5697, 5LA.5698, 5LA.6125, 5LA.9298, 5LA.9319, 5LA.10473, 5LA.10858, 5LA.12581, 5LA.12588, 5LA.12604 and 5LA.13528 we are unable to concur with your finding of effect for these properties, as full resource documentation has not been provided to our office for review. We request full report documentation of these properties, making use of standard methodologies to establish a determination of eligibility for the NRHP under the four criteria (36 CFR 60.4) that we may review. Also, please follow this information with a description of the direct and/or indirect effects of the training exercises on these properties, for our review.

Baseline monitoring for site 5LA.3123, 5LA.4725 and 5LA.7742 in FY 2016 resulted in recommendations to re-evaluate these sites for significance/eligibility and integrity. Without concurrence on determinations of eligibility from our office, we are unable to concur with a finding of effect. Identification that meets modern standards of recording must be completed, identifying any potential features and evaluate subsurface integrity to these sites.

Site 5LA.3114 was identified as a potentially contributing site to a broader Euro American Archaeological District (5LA.8780), identified by the Midwest Archaeological Center of the National Park Service in 1995. Properties that are found to contribute to the historical context of a NRHP-eligible district are also treated as eligible for listing to the NRHP. Prior to our concurrence on this property, we request additional consultation with Army to address this potential district and its contributing resource.

We do not concur with the finding of effect for the Hogback Sacred Site (5LA.10930) as the documentation and evaluation of the property is still yet to be completed and thus, a finding of effect is difficult to evaluate at this time. Current documentation does not provide a description of effects beyond the driving of multiple Humvees and Strykers into the southwest end of the resource and onto the Hogback. No other details of the activities and their affects within the site boundary have been made. Thus, we cannot confidently concur with the Army on a finding of effect for this poorly understood resource. Additional consultation is necessary between Army, SHPO, tribes, and other invited parties, so that a clearer significance to the 5LA.10930 is understood.

Additionally, we do not concur with the finding of effect for site 5LA.5256. The site was identified as potentially contributing to the Hogback Sacred Site/Hogback Traditional Site (5LA.10930) which may be a NRHP-eligible district. As mentioned above, properties that are found to contribute to the historical context of a NRHP-eligible district are themselves, treated as eligible for the NRHP. Prior to our

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concurrence on a finding of effect for this property, we request additional consultation with Army to address this potential district and the contribution of 5LA.5256 to its historical context.

Site 5LA.4407 was previously identified and evaluated as a historic property, eligible for the NRHP under criteria A and D. We do not concur with your finding of no adverse effect for this property. As the "monolith" and "concrete slab and aligned stone" features (F2 and F4) of the site have been displaced from their originally recorded locations and have not been relocated, the loss of recorded features of this size suggests neglect of a historic property [36 CFR 800.5(a)(2)(vi)] and must be consulted on for resolution of adverse effects.

Regarding site 5LA.4991, prior to our concurrence we request additional information regarding the site's depositional character in the "lowest part of the drainage", where deep rutting (~60 cm) was observed. If this area is within a dynamic alluvial environment, it is possible that cultural materials could have been buried or even carried away from these ruts in a short period of time. We would like to better understand the nature of this area of the site and further understand the assessment of subsurface archaeological deposits at this location.

Like Army, we recognize the need for more thorough documentation of the rock art panels identified at sites 5LA.2584, 5LA.4940, 5LA.5552, 5LA.9186 and 5LA.11429. We recommend that Army develop a plan to complete these activities as part of a coordinated effort to consult with tribal organizations and other interested parties. Sites identified within the areas of training activities for these past exercises that hold religious and cultural significance to tribes include 5LA.2584, 5LA.4940, 5LA.5235, 5LA.5484, 5LA.5552, 5LA.5554, 5LA.5830, 5LA.8620, 5LA.9186, 5LA.11429, 5LA.12500 and 5LA.12523. We encourage Army to take prompt action to ensure that tribal concerns are addressed as a part of consultation.

In order to complete adequate identification of site 5LA.2289 and 5LA.5360 for future consultations, we request that Army prioritize the efforts to evaluate if consolidation of sites 5LA.2290 & 5LA.2289 and 5LA.5359 & 5LA.5360 is appropriate. The results of these evaluations could have ramifications for how these sites and their surrounding landscapes are managed.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

If we may be of further assistance, please contact Edward Jakaitis, our Section 106 Compliance Manager, at (303) 866-4678 or edward.jakaitis@state.co.us.

Sincerely,



for, Steve Turner, AIA
State Historic Preservation Officer
1200 Broadway
Denver, CO 80203

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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

April 13, 2018

Office of the Director


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

Dear Mr. Turner:

Thank you for your correspondence dated March 1, 2018, concerning effects to historic properties as a result of past brigade training exercises at the Piñon Canyon Maneuver Site. The intention of this letter is to address your comments on our determinations of effects. Enclosure 1 includes the USAG Fort Carson's response to your comments. To ensure all concerns have been adequately addressed, your specific comment has been cited in its entirety followed by our response. Enclosure 2 includes a revised table of sites for which the USAG Fort Carson is requesting concurrence with our findings of effect and/or determinations of eligibility. We look forward to continuing consultation to resolve for potential adverse effects related to past brigade training exercises at the PCMS.

The point of contact for this action is Jennifer Kolise, Fort Carson Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,



Mark K. Alguire
Director of Public Works

Enclosures

Enclosure 1: USAG Fort Carson's Response to Specific Comments

SHPO Comment #1: *We do not concur with your determination of not eligible for properties 5LA.6125 and 5LA.13528. As indicated by the resource documentation forms, site 5LA.6125 and 5LA.13528 have incomplete information to make a determination and we recommend a finding of "needs data" with the property managed as eligible for listing to the NRHP.*

USAG Response #1: The submitted table did not fully explain the relationship of 5LA6125 and 5LA13528 to the observed entry by a Humvee during the 2015 1st Stryker Brigade Combat Team (1SBCT) "Raider Focus I" Training Exercise. At the time of the after action report (AAR) for the 2015 training event, site 5LA6125 included the sheltered lithic, historical structure, historical trash scatter, and historical wall segments. As stated in the "After Action Inspection Observations" column, and depicted on maps sent with the AAR, one Humvee entered the northwestern portion of the site, turned around, and exited the site. No previously recorded features were impacted; no cultural materials nor newly identified features were observed in the tracks.

During the 2016 evaluation, it was decided to treat the linear resource as a separate site from the sheltered lithic and historical structure and trash scatter. The linear resource retained the original site number, 5LA6125, while the sheltered lithic and historical structural foundation was provided a new site number, 5LA13528. Segments of this linear resource, a historical wall, have been noted on sites 5LA7418, 5LA7419, 5LA7420, and farther. The level of effort to record all segments of 5LA6125 was beyond the scope of the evaluation project; therefore, the resource was recommended as "needs data," with which the Cultural Resources Manager agreed. Until the entire linear resource has been recorded and evaluated, 5LA6125 is treated as a protected resource. The newly defined boundary of the linear resource (5LA6125) was not entered during the 2015 1SBCT "Raider Focus I" Training Exercise; only site 5LA13528 had been entered. The table maintained the original site number (5LA6125), as well as stating the new site number (5LA13528).

The site documentation and technical report provide strong justification that site 5LA13528 is not eligible for inclusion in the National Register of Historic Places. Neither the prehistoric nor historic component are eligible under any of the four NRHP criteria; plus, the site lacks any aspect of archaeological or architectural integrity. The CRM has determined site 5LA13528 is ineligible for inclusion in the NRHP. The USAG Fort Carson requests concurrence with our determination of eligibility. We also request concurrence with our determination of "no historic properties affected" in accordance with 36 CFR 800.4(d)(1).

As stated in correspondence dated November 21, 2017, and sent as part of the submission for the 2016 evaluation project (CF2016-003), the Cultural Resources Manager had determined site 5LA6125 as "needs data" for which the USAG Fort Carson requested concurrence. Since 5LA6125 was not entered by the exercise, the

USAG Fort Carson requests concurrence with our determination of “no adverse effect” to a historic property in accordance with 36 CFR 800.5(b).

SHPO Comment #2: *For sites 5LA.2317, 5LA.3153, 5LA.3300, 5LA.3208, 5LA.3254, 5LA.3384, 5LA.4399, 5LA.4430, 5LA.4437, 5LA.4950, 5LA.5008, 5LA.5348, 5LA.5375, 5LA.5554, 5LA.5697, 5LA.5698, 5LA.6125, 5LA.9298, 5LA.9319, 5LA.10473, 5LA.10858, 5LA.12581, 5LA.12588, 5LA.12604, and 5LA.13528 we are unable to concur with your finding of effect for these properties, as full resource documentation has not been provided to our office for review. We request full report documentation of these properties, making use of standard methodologies to establish a determination of eligibility for the NRHP under the four criteria (36 CFR 60.4) that we may review. Also, please follow this information with a description of the direct and/or indirect effects of the training exercises on these properties, for our review.*

USAG Response #2: With regards to sites 5LA3300, 5LA3208, 5LA3254, 5LA3384, 5LA4399, 5LA4430, 5LA4950, 5LA5697, 5LA5698, 5LA10858, and 5LA12588, these sites were recorded to modern day standards and evaluated during the 2017 evaluation project. The technical report and associated site documentation for 5LA10858 has been submitted to your office via correspondence dated March 20, 2018. The technical report and all associated site documentation for the remaining sites have been submitted to your office via correspondence dated March 28, 2018. We request concurrence with our determinations of eligibility for these resources, as well as determinations of effect associated with the past brigade exercises.

For sites 5LA6125 and 5LA13528, please refer to USAG Response #1.

5LA2317: As stated in the “Comments” column of the submitted table, the SHPO recommended site 5LA2317 be considered “needs data” until the discrepancy between the submitted site documentation and AAR for the 2010 2-4 Brigade Combat Team (BCT) “Warhorse Rampage” Training Exercise is clarified. The 2010 evaluation recommended the site as eligible for the NRHP under Criterion C, since the cairn exhibits “unique construction techniques. According to the 2010 site documentation, the rest of the site is not recommended as eligible, as it lacks all aspects of integrity. The 2010 AAR stated the rest of the site is insignificant and lacks integrity. In an effort to resolve this conflict, the site is scheduled to be revisited and evaluated in 2018. For the purposes of Section 106 consultation, “needs data” sites are treated as eligible for inclusion in the NRHP. The 2010 AAR and site documentation stated multiple sets of tank tracks were observed throughout the site, but no features had been impacted. Your office has all site documentation and reports related to 5LA2317 to date. Since the cairn is the only feature on the site that may potentially be significant, the USAG Fort Carson requests concurrence with our determination of “no adverse effects” to a historic property in accordance with 36 CFR 800.5(b).

5LA3153: Site 5LA3153 was originally recorded in 1984 by the University of Denver. The site is described as a single isolated hearth and sparse prehistoric artifact assemblage comprised of lithic debitage, biface fragments, and a mano. The hearth

consists of a burned limestone pebble concentration surrounded by 7 basalt rocks (7 cm x 6 cm x 3 cm) surrounding the limestone concentration; no charcoal was present, but the soil is a dark grayish brown within the feature area. The University of Denver recommended the site as ineligible for the NRHP, stating all potential data had been collected. As part of the data rectification in 2014, the site documentation was submitted to your office, and the USAG Fort Carson requested concurrence with our determination of eligibility. The SHPO disagreed, and recommended the site be considered "needs data" until subsurface evaluation was conducted to adequately address significance under Criterion D. For the purposes of Section 106 consultation, 5LA3153 is treated as eligible for inclusion in the NRHP. The Colorado Resource Re-Visitation Form submitted to your office as part of the Section 106 consultation for the 2017 1SBCT "Raider Focus II" Training Exercise states no cultural materials nor features were observed in the tracks. In fact, the Stell archaeologists who performed the after action inspections did not observe any cultural materials in the reported UTM location for 5LA3153. This is a common occurrence for sites that were recorded prior to 2000. The associated rutting from the vehicle tracks is minimal (5 cm or less in depth). Based on this evidence, the USAG Fort Carson requests concurrence with our determination of "no adverse effects" to a historic property related to the 2017 training event in accordance with 36 CFR 800.5(b).

5LA4437: The Charles Conkle Homestead (5LA4437) was originally recorded by Larson-Tibesar Associates (LTA) and Centennial Archaeology, Inc., (CAI) in 1987. The features and artifact assemblage are typical of the numerous homesteads and ranch complexes recorded on the PCMS. Feature 1 is described as "the remains of a house with only piles of limestone. No foundation is in evidence." Feature 2 is a cistern that has partially collapsed. Feature 3 is a possible privy. Feature 4 is a concrete privy, potentially representative of a 1940s federal government-sponsored program. Feature 5 is the remains of a wood plank shed. Feature 6 is corral remnant constructed from juniper posts and milled lumber posts. Feature 7 is three depressions that served as stock ponds. Feature 8 is a capped well. Feature 9 is the remains of a wood plank outbuilding. The artifact assemblage consists of bottle glass (colorless, aqua, purple, and veterinary-type brown bottles), sanitary tin cans, ceramics, and miscellaneous metal, and dates to the early to mid-1900s. The site is described as heavily disturbed. LTA/CAI recommended the site as ineligible for inclusion in the NRHP, stating all relevant data had been collected. As part of the data rectification in 2014, the site documentation was submitted to your office, and the USAG Fort Carson requested concurrence with our determination of eligibility. The SHPO disagreed, and recommended the site be considered "needs data" until subsurface evaluation was conducted to adequately address significance under Criterion D. As such, the site is treated as eligible to the NRHP for purposes of Section 106 consultation. The Colorado Resource Re-Visitation Form submitted to your office as part of the Section 106 consultation for the 2017 1SBCT "Raider Focus II" Training Exercise states none of the features were impacted. Rutting was minimal (5 cm or less in depth). Given the poor site integrity, the Stell archaeologists who performed the after action inspection agreed with LTA/CAI's recommendation that the site is ineligible. The USAG Fort Carson

requests concurrence with our determination of "no adverse effects" to a historic property related to the 2017 training event in accordance with 36 CFR 800.5(b).

5LA5008: In paragraph 4 of your correspondence, you concurred with the USAG Fort Carson's determination that site 5LA5008 is eligible for inclusion in the NRHP under Criterion D for its potential to yield significant data regarding the Barnes, McKean, and Paleoindian occupations. This determination is based on the recommendations from the 2016 evaluation. The technical report and associated site documentation have been submitted to your office in November 2017. The 2016 fieldwork occurred on July 26, 2016, after the 2015 training event during which the site was entered. Although the site has been impacted by military training in 2015 and previously, the disturbances have not affected the site's eligibility. Therefore, the USAG Fort Carson requests concurrence with our determination of "no adverse effects" to a historic property in accordance with 36 CFR 800.5(b).

5LA5348: The 2015 evaluation of this open architectural site recommended it as ineligible for the NRHP, stating 5LA5348 lacked systemic integrity. The technical report and site documentation was submitted to your office via correspondence dated September 12, 2016. Your office did not concur with our determination of eligibility (HC #70981; November 17, 2016). You recommended site 5LA5348 as eligible under Criterion D, because the 2015 evaluation documented a new stone circle feature and 31 previously unrecorded artifacts, suggesting artifact regeneration over the 30 years since its original recording. In addition, it was also recommended other methods should be employed to identify cultural material at stone circle sites, referencing the Dominguez Archaeological Research Group for its Wickiup Project. Other suggested methods included testing within and outside of features and use of metal detectors, ground penetrating radar, and magnetometry.

The USAG Fort Carson does not agree with your recommendation that site 5LA5348 should be considered eligible. Although one new spaced-stone circle was identified, the 2015 evaluation failed to relocate four of the previously recorded spaced-stone circles (Features 1, 2, 7, and 8). Testing did occur within and outside of the features. All shovel probes, which were terminated at bedrock, failed to recover any cultural materials, and soils observed in the probes were similar in color and type. The artifact assemblage is mixed; therefore discreet occupations cannot be discerned. This is also suggested by the features, since some of the spaced-stone circles are large and some are small, which indicates both pre- and post-horse time periods. But, feature size cannot be definitively used as a temporal indicator, as natural formation processes continue to degrade their boundaries. As such, there is no associative value; therefore, the site is not eligible under Criteria A or B. Criterion C is not met, since the artifact assemblage is technologically and functionally common in both materials and methods of manufacture. The spaced-stone circles have lost their integrity of design and workmanship. There is no potential for significant data to inform our knowledge of the prehistory of the region; thus, the site is not eligible under Criterion D. The Cultural Resources Manager stands by the previous determination that the site is not eligible for inclusion in the NRHP, and that no historic properties have been affected by the 2017 training event, which resulted

mostly in matted vegetation. The USAG Fort Carson requests concurrence with our determination of eligibility, as well as our determination of "no historic properties affected" in accordance with 36 CFR 800.4(d)(1).

While value in some locations, the use of remote sensing techniques, such as ground penetrating radar and magnetometry, have had mixed results in the past at other sites on the Piñon Canyon Maneuver Site (PCMS). Often the geology and soil typology of the PCMS is not conducive to the use of remote sensing. Based on the soil types and geology at 5LA5348, these technologies would not yield useful information to interpret the site. Because of the time and costs associated with the use of remote sensing techniques, there is no justification to warrant their use at this site. In addition, the use of metal detectors on a prehistoric site would not yield any useful data.

5LA5375: The site was recorded in 1983 by the University of Denver, and recommended as "needs data." In correspondence dated September 15, 2014 (CHS #65835), your office concurred with our determination that 5LA5375 is "needs data." As such, the site is treated as eligible to the NRHP for purposes of Section 106 consultation. The Colorado Resource Re-Visitation Form submitted to your office as part of the Section 106 consultation for the 2017 1SBCT "Raider Focus II" Training Exercise states four Humvees entered the portion of the site that is outside of the fenced protection perimeter, causing ruts up to 25 cm in depth. No features were noted within or in the vicinity of these tracks. Based on Stell archaeologists' observations, surficial cultural materials lack archaeological integrity. The USAG Fort Carson requests concurrence with our determination of "no adverse effects" to a historic property related to the 2017 training event in accordance with 36 CFR 800.5(b).

5LA5554: In paragraph 7 of your correspondence, you concurred with our finding of no adverse effect [36 CFR 800.5(d)(1)].

5LA9298: All site documentation and associated reports have been provided to your office. We received concurrence with our determination of eligibility via correspondence dated December 5, 2011. The site has been determined eligible under Criterion D due to the information potential within Feature 3, the dugout. During the 2013 2-4 BCT "Warhorse Charge" Training Exercise, tracked and wheeled vehicles entered the site. Feature 3, the only potentially significant feature on the site, was not impacted. Baseline monitoring occurred at the site in 2015; the monitors did not note any cumulative impacts associated with military training. We request concurrence with our finding of no adverse effect [36 CFR 800.5(b)].

5LA9319: All site documentation and associated reports have been provided to your office. The site has been determined eligible under Criterion D for information potential within the rockshelter (Feature 1). Concurrence with this determination of eligibility was received via correspondence dated February 28, 2011 (CHS #58008), after the site had been entered during the 2010 2-4 BCT "Warhorse Rampage" Training Exercise. The vehicle only clipped the northeastern portion of site 5LA9319; there was very minimal sediment disturbance. No features were impacted. The site was visited during the

baseline monitoring/conditions assessment in 2016; the monitors stated no cumulative effects from the 2010 entry were noted. We request concurrence with our determination of "no adverse effect" to a historic property in accordance with 36 CFR 800.5(b).

5LA10473: All site documentation and associated reports have been provided to your office. The site has been determined eligible under Criterion D for information potential for which concurrence was received via correspondence dated April 13, 2012 (CHS #60388). Site 5LA10473 was entered during the 2013 training event. Of the six recorded entry locations, four breached the site boundary, resulting in matted grass to less than 2 cm of sediment disturbance. No features were impacted. The site was visited during the baseline monitoring/conditions assessment in 2016; none of the entries associated with the 2013 2-4 BCT "Warhorse Charge" Training Exercise were noted. Tracks were noted in the southeastern portion of the site, but these are associated with an unknown past training exercise. No cumulative effects from military training were observed. The USAG Fort Carson requests concurrence with our determination of "no adverse effect" to a historic property in accordance with 36 CFR 800.5(b).

5LA12581: In paragraph 7 of your correspondence, you concurred with our finding of no adverse effect [36 CFR 800.5(b)].

5LA12604: All site documentation and associated reports have been provided to your office. Site 5LA12604 has been determined eligible under Criterion D for information potential for which concurrence was received via correspondence dated August 11, 2014 (CHS #65835). During the 2015 1SBCT "Raider Focus I" Training Exercise, Strykers drove through the site, leaving light impressions (<2 cm in depth) to moderate ruts (~25 cm in depth). The north wall fall of the dugout (Feature 5) was clipped, but no adverse effects were noted. No cultural materials nor newly identified features were observed in the tracks. Baseline monitoring occurred at the site in 2017. The monitors did note the tracks from the 2015 training event; they stated no cumulative impacts have resulted from military training. The USAG Fort Carson requests concurrence with our determination of "no adverse effect" to a historic property in accordance with 36 CFR 800.5(b).

SHPO Comment #3: *Baseline monitoring for site 5LA.3123, 5LA.4725, and 5LA.7742 in FY 2016 resulted in recommendations to re-evaluate these sites for significance/eligibility and integrity. Without concurrence on determinations of eligibility from our office, we are unable to concur with a finding of effect. Identification that meets modern standards of recording must be completed, identifying any potential features and evaluate subsurface integrity to these sites.*

USAG Response #3: Your office should have all site documentation and associated reports for 5LA3123, 5LA4725, and 5LA7742. These have been provided as part of the data rectification in 2014 and as part of this Section 106 consultation.

5LA3123: As explained in the "Comments" column of the submitted table, this site has been treated as eligible for the NRHP based on correspondence dated September 6, 2013 (CHS #64524). The baseline monitoring visit, which was conducted in 2016 prior to the 2017 training event, recommended an evaluation to address the site's significance and integrity. This monitoring visit confirmed the location and boundaries of all features, as well as the site's location and boundary. In fact, the original 1984 site documentation recommend the site as ineligible for inclusion in the NRHP. There were conflicting statements in the 1984 site documentation, which led your staff to recommend the site may be eligible under Criteria A and D. Only through evaluative testing and archival research can this disagreement over the site's eligibility be resolved. Until then, the site continues to be treated as eligible for inclusion in the NRHP.

As shown on the site map provided to your office, along with the Colorado Cultural Resource Re-Visit and the 2017 1SBCT "Raider Focus II" Training Exercise AAR, the vehicle tracks do not impact any of the previously recorded features. Based on the 1984 site map, Feature 2 (possible privy) is located just north of Feature 1 and Structure 1. Therefore, it is not within the area driven over by the Humvees and passenger truck. No cultural materials nor newly identified features were observed in the tracks.

A re-evaluation of the site does not need to be completed prior to concurrence with our determination of effect as related to the 2017 training event, the undertaking for which this Section 106 consultation is concerned. The USAG Fort Carson requests concurrence with our finding of no adverse effect in accordance with 36 CFR 800.5(b).

5LA4725: Site 5LA4725 is eligible for inclusion in the NRHP; your office provided concurrence with this determination of eligibility via correspondence dated April 15, 2013 (CHS #63620). The Stell archaeologists, who performed the baseline monitoring visit in 2016 after the 2015 training event during which the site was entered, recommended the site to be recorded to modern day standards to ensure all features have been adequately recorded due to incomplete past recordings. The significance, integrity, or eligibility of the 5LA4725 is not in question. The USAG Fort Carson continues to stand by its original determination that the site is eligible for inclusion in the NRHP.

None of the vehicles that entered the site impacted any previously recorded, as shown on the site map provided as part of the 2015 1SBCT "Raider Focus I" Training Exercise; this was also confirmed during the baseline monitoring visit in 2016. Most of the site features are located along or beneath the canyon rim. The recorded location of the Feature 1 artifact concentration is well outside the areas driven through during the 2015 training event.

A re-evaluation of the site does not need to be completed prior to concurrence with our determination of effect as related to the 2015 training event, the undertaking for which this Section 106 consultation is concerned. The USAG Fort Carson requests

concurrence with our determination of “no adverse effects” to a historic property in accordance with 36 CFR 800.5(b).

5LA7742: Site 5LA7742 has been determined eligible under Criterion D for information potential; concurrence with this eligibility of determination was received via correspondence dated July 26, 2010 (CHS #52400). Baseline monitoring occurred in 2016, after the 2015 training event during which the site was entered. The Stell archaeologists recommended a re-evaluation to 1) investigate and record the additional rockshelters with possible architecture noted during the visit; 2) determine if site 5LA7742 and 5LA9662 overlap and should be consolidated; and 3) determine if the site has intact cultural materials, since no subsurface testing has ever been conducted on the site. The monitors did observe the vehicle tracks associated with the 2015 1SBCT “Raider Focus I” Training Exercise. They confirmed no previously recorded features were impacted, and no newly identified features nor cultural materials were observed in the tracks.

A re-evaluation of the site does not need to be completed prior to concurrence with our determination of effect as related to the 2015 training event, the undertaking for which this Section 106 consultation is concerned. The USAG Fort Carson requests concurrence with our determination of “no adverse effects” to a historic property in accordance with 36 CFR 800.5(b).

SHPO Comment #4: *Site 5LA.3114 was identified as a potentially contributing site to a broader Euro American Archaeological District (5LA.8780), identified by the Midwest Archaeological Center of the National Park Service in 1995. Properties that are found to contribute to the historical context of a NRHP-eligible district are also treated as eligible for listing to the NRHP. Prior to our concurrence on this property, we request additional consultation with Army to address this potential district and its contributing resource.*

USAG Response #4: Please refer to the Management Data Form Section 31, as well as Section 5.14.5 of the associated technical report (Owens et al. 2017), which was submitted to your office in November 2017. Both provide firm justification for why 5LA3114 does not contribute to the Euro American Archaeological District proposed by the Midwest Archaeological Center of the National Park Service in 1995 (De Vore 1995), as well as why the site is not eligible for inclusion in the NRHP. In paragraph 5 of your correspondence, you have concurred with our determination that site 5LA3114 is ineligible for the NRHP.

Section 4.1.4 of Owens et al. (2017: 4-3 to 4-4) discusses the USAG Fort Carson's stance on De Vore's proposed archaeological districts. These draft multiple property nominations were never finalized and never accepted by the Army. De Vore's reasoning for recommending sites as contributing to these proposed districts relied heavily upon Andresfky (1990), the report that summarizes the fieldwork conducted by the University of Denver, LTA, and CAI during the 1980s. Andresfky (1990) is riddled with inconsistencies and contradictions to the submitted site documentation. De Vore

did not verify any of this data. For this reason alone, these proposed districts and the draft multiple property nominations are useless. In addition, the Army does not support the creation of large, overarching archaeological districts, such as De Vore's proposed districts.

SHPO Comment #5: *We do not concur with the finding of effect for the Hogback Sacred Site (5LA.10930) as the documentation and evaluation of the property is still yet to be completed and thus, a finding of effect is difficult to evaluate at this time. Current documentation does not provide a description of effects beyond the driving of multiple Humvees and Strykers into the southwest end of the resource and onto the Hogback. No other details of the activities and their affects within the site boundary have been made. Thus, we cannot confidentially concur with the Army on a finding of effect for this poorly understood resource. Additional consultation is necessary between the Army, SHPO, tribes, and other invited parties, so that a clearer significance to the 5LA.10930 is understood.*

USAG Response #5: As explained in the Colorado Cultural Resources Re-Visit form submitted as part of the AAR for the 2017 1SBCT "Raider Focus II" Training Exercise, the Hogback (Training Area A) was identified as a sacred site and traditional cultural property during a Native American ethnographic study conducted in the early 2000s (Blythe 2008), and provided a Smithsonian trinomial. Sacred sites do not need formal recordation nor SHPO review and concurrence to be protected in the same manner as a site that is eligible for inclusion to the NRHP. As such, the Hogback is treated as a NRHP-eligible resource for the purposes of Section 106 consultation. The USAG Fort Carson is currently collaborating with federally recognized Native American Tribes that are culturally affiliated with the PCMS to conduct a holistic study of the Hogback. The USAG Fort Carson has also consulted with the Tribes regarding effects to this resource as a result of the 2017 training event, and have taken into account their concerns when making the determination of effect. With regards to Native American sacred sites, the determination of significance is between the federal agency and the Tribes, not the SHPO and other invited parties.

The vehicles that drove in the boundaries of Training Area A and onto the Hogback left primarily matted vegetation, with some minimal compression ruts up to 9 cm in depth. No cultural materials nor features were observed in these tracks. The USAG Fort Carson requests concurrence with our finding of no adverse effect in accordance with 36 CFR 800.5(b).

SHPO Comment #6: *Additionally, we do not concur with the finding of effect for site 5LA.5256. The site was identified as potentially contributing to the Hogback Sacred Site/Hogback Traditional Site (5LA.10930) which may be a NRHP-eligible district. As mentioned above, properties that are found to contribute to the historical context of a NRHP-eligible district are themselves, treated as eligible for the NRHP. Prior to concurrence on a finding of effect for this property, we request additional consultation with Army to address this potential district and the contribution of 5LA.5256 to its historical context.*

USAG Response #6: The USAG Fort Carson has changed its determination of effect to no adverse effect [36 CFR 800.5(b)]. Although 5LA5256 has been determined as ineligible for inclusion in the NRHP for which concurrence has been received via correspondence dated February 7, 2013 (CHS #60904), it was identified as a potential contributing site to the Hogback Sacred Site / Traditional Site during an ethnographic study conducted in the early 2000s (Blythe 2008). As such, it is considered a protected resource, and treated as eligible for inclusion in the NRHP for Section 106 consultation purposes. As stated in the Colorado Cultural Resources Re-Visit Form submitted as part of the 2017 training event's AAR, the eastern site boundary was barely crossed by Strykers loosely following an existing two-track road. Where the vehicles turned, there are ruts up to 35 cm in depth. No cultural materials, features, nor significant stratigraphic changes were observed in the tracks. We request concurrence with our determination of "no adverse effect" to a historic property in accordance with 36 CFR 800.5(b).

SHPO Comment #7: *Site 5LA.4407 was previously identified and evaluated as a historic property, eligible for the NRHP under criteria A and D. We do not concur with your finding of no adverse effect for this property. As the "monolith" and "concrete slab and aligned stone" features (F2 and F4) of the site have been displaced from their originally recorded locations and have not been relocated, the loss of recorded features of this size suggests neglect of a historic property [36 CFR 800.5(a)(2)(vi)] and must be consulted on for resolution of adverse effects.*

USAG Response #7: Site 5LA4407 was originally recorded by LTA in 1987, and was recommended as ineligible for the NRHP. As part of the data rectification in 2014, the site documentation was submitted to your office, and the USAG Fort Carson requested concurrence with our determination of eligibility. The SHPO disagreed, and recommended the site be considered "needs data," stating it had not been adequately evaluated under Criterion D and it was listed as a contributing property to De Vore's Euro-American Archaeological District. In 2016, the site was evaluated by Stell, and recommended as eligible under Criteria A and D. We received concurrence with our determination of eligibility in paragraph 4 of your correspondence (HC #71348; March 1, 2018). The evaluation was conducted *after* the 2015 1SBCT "Raider Focus I" Training Exercise during which the site was entered.

In 2015, the Stell archaeologists who performed the after action inspections for the training event stated Feature 2 (monolith) and Feature 4 (concrete slab and aligned stone) were not observed, and hypothesized these features may have been lost due to an unknown prior event, not due to the 2015 training event.

In 2016, Stell located the monolith and associated slab pavement (Feature 2), as well as Feature 4 (concrete slab and aligned stone). Since the original recording and prior to the 2015 training event, the monolith has toppled over onto the associated pavement dislodging some of its stones. Feature 2 is interpreted to be a hitching post (monolith) with stone pavement. The archaeologists conducting the evaluation also located

Feature 4, which was originally described as a concrete slab and aligned stone. A similar monolith (Feature 8) was identified in 2016 on a terrace north Feature 5. During the evaluation, it was determined the three physical pieces of the originally recorded Feature 4 are functionally unrelated. Now, Feature 4 is the northern semi-circular wall, which is inferred to be a fence for the yard in front of Feature 1 (dugout). This wall is much longer than originally recorded in 1987. Feature 6 is the drilled well concrete pad in front of the entrance to the dugout (Feature 1). Feature 7 is the other wall alignment, and interpreted to be the remains of an outbuilding foundation.

“Neglect of a property which *causes* its deterioration” [36 CFR 800.5(a)(2)(vi); emphasis added] is considered an adverse effect to a historic property. The term “effect” is defined as an “alteration to the characteristics of a historic property *qualifying* it for inclusion in or eligibility for the National Register” [36 CFR 800.16(i); emphasis added]. As specified in 36 CFR 800.5(a)(1), an adverse effect occurs when this alteration, either direct or indirect, has diminished the integrity of the historic property’s location, design, setting, materials, workmanship, feeling, or association; and these may include reasonably foreseeable effects that may occur at a later date due to the undertaking, cumulative effects, or effects that are farther removed in distance. The collapse of Feature 2 has not diminished the integrity of the site, which is why it was determined eligible for the NRHP even though the monolith was no longer standing and pavement stones had been dislodged. Neither Feature 2 nor Feature 4 are considered features that *qualify* site 5LA4407 to be eligible for the NRHP. In addition, these features were already in various states of deterioration (i.e. ruins) when originally recorded in 1987. Nature has continued, and continues, to take its course on these ruins. This natural deterioration is not demolition by neglect, since these features were already in disrepair when recorded. We request concurrence with our determination of “no adverse effects” to a historic property related to the 2015 training event in accordance with 36 CFR 800.5(b).

SHPO Comment #8: *Regarding site 5LA.4991, prior to our concurrence we request additional information regarding the site’s depositional character in the “lowest part of the drainage”, where deep rutting (~60 cm) was observed. If this area is within a dynamic alluvial environment, it is possible that cultural materials could have been buried or carried away from these ruts in a short period of time. We would like to better understand the nature of this area of the site and further understand the assessment of subsurface archaeological deposits at this location.*

USAG Response #8: The USAG Fort Carson has conducted a number of visits to this site. Previous visits identified rock shelters (3); bedrock metates (11); linear walls or alignments (3); and an abutment structure (1) (for the most extensive overview of the site, see the re-visitation form completed as part of the 2008 PCMS Bridger BAER Survey and Site Assessment Project). To summarize, there are extensive deposits within the rockshelters and subsequent activity areas in front of the shelters. There is no indication in any of the previous work that any cultural deposits exist in the drainage. Maps and photographs of the vehicle tracks that transverse the site show only one small (~3m in length) area where the rutting was significant.

As stated in the observations by the archaeologists who conducted the after action inspection, "no previously recorded features impacted; no features nor cultural materials observed in tracks; site has been impacted by past training maneuvers." If cultural materials had been observed within the ruts in the drainage, these materials would have been found in secondary context, having eroded from above and deposited in the drainage by sheetwash erosion. We request concurrence with our finding of no adverse effect [36 CFR 800.5(b)].

SHPO Comment #9: *Like Army, we recognize the need for more thorough documentation of the rock art panels identified at sites 5LA.2584, 5LA.4940, 5LA.5552, 5LA.9186, and 5LA.11429. We recommend that Army develop a plan to complete these activities as part of a coordinated effort to consult with tribal organizations and other interested parties. Sites identified within the areas of training activities for these past exercises that hold religious and cultural significance to tribes include 5LA.2584, 5LA.4940, 5LA.5235, 5LA.5484, 5LA.5552, 5LA.5830, 5LA.8620, 5LA.9186, 5LA.11429, 5LA.12500 and 5LA.12523. We encourage Army to take prompt action to ensure that tribal concerns are addressed as part of consultation.*

USAG Response #9: The USAG Fort Carson has consulted with the federally recognized Native American Tribes that are culturally affiliated with the PCMS on the effects associated with the past brigade exercises at sites that may hold religious and cultural significance to them. Tribal concerns have been taken into account and addressed as part of our assessment of effects to these sites.

In paragraph 7 of your correspondence, you have concurred with our finding of no adverse effect [36 CFR 800.5(b)] for the following: 5LA4940, 5LA5235, 5LA5484, 5LA5552, 5LA8620, 5LA9186, 5LA11429, and 5LA12523. In paragraph 8, you have concurred with our finding of adverse effect due to neglect [36 CFR 800.5(d)(2)] for 5LA5830, which is related to the historic architectural resources at the site and not the prehistoric component. We request concurrence with our determination of "no adverse effect to a historic properties" for sites 5LA2584 and 5LA12500.

SHPO Comment #10: *In order to complete adequate identification of site 5LA.2289 and 5LA.5360 for future consultations, we request that Army prioritize the efforts to evaluate if consolidation of sites 5LA.2290 & 5LA.2289 and 5LA.5359 & 5LA.5360 is appropriate. The results of these evaluations could have ramifications for how these sites and their surrounding landscapes are managed.*

USAG Comment #10: As stated in the "Comments" column of the submitted table, and as referenced in the "Determination of Eligibility" column, site 5LA2290 has been merged with 5LA2289, and its Smithsonian trinomial has been retired for which we have received your concurrence in correspondence dated August 10, 2016 (HC #69860). The technical report and associated site documentation for this 2014 evaluation has been submitted to your office.

With regards to sites 5LA5359 and 5LA5360, it was not until the 2016 baseline monitoring in which the site location and boundary had been verified and updated that it was realized these two sites should be merged. The evaluation to merge the two sites will be prioritized based on training needs and other program initiatives that have priority. Since the vehicles only clipped the southwestern edge of site 5LA5360, leaving only matted vegetation and no ruts, the USAG Fort Carson requests concurrence with our determination of "no adverse effects" to a historic property in accordance with 36 CFR 800.5(b).



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Hal K. Alguire

Director of Public Works

US Army Installation Management Command

Directorate of Public Works

1626 Evans Street, BLDG 1219

Fort Carson, CO 80913-4143

Handwritten: *9 Aug 2018*

Handwritten: *To: Environment Division*

AUG 02 2018

Re: Ongoing Consultation Concerning Determinations of Eligibility and Effect for Past Brigade Trainings at the Piñon Canyon Maneuver Site (PCMS) (HC#71348)

Dear Mr. Alguire:

Thank you for your correspondence dated April 13, 2018 and received by our office on April 18, 2018 continuing consultation concerning the effects to historic properties of past brigade training exercises at PCMS. Specifically, this consultation concerns the 2010 2-4 Brigade Combat Team "Warhorse Rampage" (HC#58008), the 2013 2-4 Brigade Combat Team "Warhorse Rampage" (HC#63119), the 2015 1st Stryker Brigade Combat Team "Raider Focus" (HC#69195), and the 2017 1st Stryker Brigade Combat Team "Raider Focus" (HC#72672) Training Exercises. Delays in the review of these exercises from their original submissions has resulted from a number of factors, including staffing changes at U.S. Army Garrison (USAG) Fort Carson and the State Historic Preservation Office (SHPO), debate regarding compliance, and varying workloads. We thank you for your diligence in continuing the process as we work towards a mitigation plan and determine how best to protect the historic properties and cultural resources at PCMS.

The letter we received is a response to many of our comments provided on March 1, 2018. At that point, we had not received the documentation which was sent to our office on March 28, 2018 and received on March 30, 2018 (HC#74013). We provided a response to that documentation on April 25, 2018 which addresses some, but not all, of the concerns discussed. Additionally, other concerns are addressed in our letter dated June 14, 2018 concerning reevaluation of 88 PCMS sites (HC#73224) as well as in a forthcoming letter from our office focusing on eligibility determinations and effect findings of the 2017 1STBCT training exercises (HC#72672). We will attempt to summarize these letters here as they apply to your March 1, 2018 letter and provide additional comments as appropriate.

With regard to USAG Response #1, we thank you for your explanation concerning the decision to split 5LA.6125 into two separate sites. However, we are still unclear as to why the historic wall (5LA.13528) was differentiated from site 5LA.6125. Is there clear evidence that these historic wall segments are unrelated to the historic structure and trash scatter within 5LA.6125? We understand that the wall segments occur far away from the main concentration of site 5LA.6125, but we do not feel that this is sufficient justification for separation. Could the segments have been recorded as features of the original site? In our letter dated June 14, 2018, we concurred with the recommended determination that 5LA.6125 needs data before its eligibility can be determined. We cannot concur with a finding of effect for 5LA.6125 or 5LA.13528 until we can agree on how the wall segments are related to 5LA.6125.

With regard to USAG Response #2, we provided concurrence for many of the sites in question in our letter dated April 25, 2018. We concurred with eligibility determinations for 5LA.3208, 5LA.3254, 5LA.3300, 5LA.3384, 5LA.4399, 5LA.4430, 5LA.4950, 5LA.5698, 5LA.10858, and 5LA.12588. In our



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forthcoming letter, we also concurred with the eligibility determination for 5LA.5697. However, we did not concur with effect findings for sites 5LA.3300 and 5LA.5698 as the forms were missing from the documentation packet (HC#72672) and request that these are sent to us.

Several other sites in question are also addressed in our forthcoming letter. We provide concurrence with eligibility determinations of *needs data* for 5LA.3153, 5LA.4437, and 5LA.5375, and request the opportunity to review the information gained from a reevaluation of these sites before assessing eligibility. An adverse effect includes the diminishment of the qualifying characteristics of a property for including in the NRHP and this would include removing information important for making an eligibility determination. This site does not have protection measures in place, and until eligibility can be determined, any impact, however small, could be an adverse effect to needs data sites. For similar reasons, we maintain the position stated in our March 1, 2018 letter that while we concur that the recommended eligibility determination of *needs data* is appropriate for site 5LA.2317 and 5LA.5348, we request the opportunity to review the information gained from a reevaluation of this site before assessing effect.

For site 5LA.5008, while we have concurred with the eligibility determination for this site in both our March 1, 2018 and June 14, 2018 letters, we request a new site form which summarizes all of the relevant information gained from fieldwork along with the impacts of training exercises in one place prior to providing concurrence on effect findings.

For site 5LA.5348, as stated above, we request additional information before assessing the recommended finding of effect. We understand that surveyors in 2015 were unable to locate four of the previously recorded spaced stone circles. What happened to them then? What forces have changed the landscape and caused stones to move? Are natural formation processes that prevalent at this site or are cultural formation processes also playing a role? Or is the newly recorded site different from 5LA.5348 and the site was mis-plotted? It appears that if the location documented is the original 5LA.5348 site, there are cumulative effects to this site which are causing the spaced stone circles to disappear. Cumulative effects may constitute an adverse effect to historic properties, and we cannot concur with a finding of no historic properties until we have more information and fully understand what is happening at this site. Furthermore, while we understand your argument that a variety of remote sensing techniques have had limited success at PCMS to date, we would like to remind you that proto-historic groups in the region utilized metal projectile points, which would be one kind of useful data that could be gained by quickly scanning spaced stone circles with metal detectors.

For site 5LA.5375, our forthcoming letter provides concurrence with the eligibility determination of needs data. Because this site needs additional data in order to make an eligibility determination, any impact to the site may result in adverse effects. An adverse effect includes the diminishment of the qualifying characteristics of a property for including in the NRHP and this would include removing information important for making an eligibility determination. This site does not have protection measures in place, and until eligibility can be determined, we suggest that any impact, however small, be considered an adverse effect to needs data sites.

For site 5LA.9298, we recognize that our office provided concurrence on eligibility prior to the site being impacted by the inadvertent entry of multiple vehicles during the 2013 2-4 BCT Training. We also note that site 5LA.9298 had been impacted at some earlier date as well, suggesting that there may be



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cumulative effects. As stated in our letter dated March 1, 2018, we request that new copies of a re-visitation site form be submitted with a discussion of both the direct and indirect effects that the training exercises (the 2013 2-4 BCT and any previous training(s) which resulted in entry) may have caused to the site as a whole.

After review of the documentation provided for sites 5LA.9319 and 5LA.10473, we concur that the recommended effect findings of *no adverse effect* [36 CFR 800.4(d)(1)] are appropriate.

For site 5LA.12604, we recognize that our office provided concurrence on eligibility prior to the site being impacted by the inadvertent entry of multiple vehicles during the 2015 1STBCT Training. We also note that site 5LA.12604 had been impacted at some earlier date as well, suggesting that there may be cumulative effects. As stated in our letter dated March 1, 2018, we request that new copies of a re-visitation site form be submitted with a discussion of both the direct and indirect effects that the training exercises (the 2015 1STBCT and any previous training(s) which resulted in entry) may have caused to the site as a whole. The vehicles drove directly over wall fall associated with Feature 3 and there may have been important information regarding collapse of the structure in the wall fall. Additionally, we are concerned that the depth of rutting (up to 25cm) may constitute an adverse effect by causing mixing of sediment strata. We request that this is taken into account on the site form when addressing effects.

We apologize for the confusion regarding 5LA.5554 and 5LA.12581. In our forthcoming letter, we discuss 5LA.5554 as it relates to other sites within the Hogback/Training Area A and suggest that any affect by vehicles to this area be considered an adverse effect.

With regard to USAG Response #3, we understand that concurrence with eligibility determinations of *needs data* has previously been given for site 5LA.3123. As this site needs additional data in order to make an eligibility determination, any impact to the site may result in adverse effects. An adverse effect includes the diminishment of the qualifying characteristics of a property for including in the NRHP and this would include removing information important for making an eligibility determination. This site does not have protection measures in place, and until eligibility can be determined, we suggest that any impact, however small, be considered an adverse effect to needs data sites.

After review of the documentation provided for site 5LA.4725 and 5LA.7742, we concur that the recommended effect findings of *no adverse effect* [36 CFR 800.4(d)(1)] are appropriate.

With regard to USAG Response #4, we thank you for the provided reference to DeVore (1995) and discussion of USAG's position on the proposed archaeological districts. Although USAG did not finalize the multiple property nominations prepared in association with DeVore, that does not mean that the district in question does not have National or State Register District Potential (OAHP Form 1400 Management Data Questions 37 and 39). We understand that from a management standpoint the present USAG administration does not follow Thomas Warren, a former Director of Environmental Compliance and Management, in his support of creating multiple archaeological districts within PCMS. There are cases where the most appropriate method for documenting, understanding, and managing archaeological resources is by viewing sites together as districts. For example, 5CR.234, the White Hills/Silver Plateau Cultural Landscape, was designated as a Rural Historic Landscape Site located in Custer county, and associated with historic mining efforts in that area, allowing prospect trenches and pits, survey markers, tailing piles, and adits to be understood in aggregate, where they may have previously been overlooked



when recorded as isolates. We suggest that as USAG works to define the Hogback district (5LA.10930), it may be appropriate to revisit the Euroamerican Archaeological District as well (5LA.8780) and critically evaluate how USAG may benefit from defining cultural landscapes (OAHF Form 1404) or districts (see National Register Bulletin 30) at PCMS.

With regard to USAG Response #5, our forthcoming letter addresses site 5LA.10930. There, we reiterate our position that it is imperative that both the Hogback Traditional/Sacred Site and the contributions of individual sites to the Hogback district be understood in order to better assess necessary protection measures within Training Area A. Blythe (2008:44-71; MC.DA.R23) provides a summary of Native American consultation concerning the Hogback and may be a good place to start in creating a site form for 5LA.10930. We understand that consultation with Indian tribes is ongoing, and while sacred sites do not need formal recording or SHPO concurrence in order to be protected in the same manner as NRHP-eligible sites, until an agreement between USAG Fort Carson and the tribes is reached, we feel that it is appropriate to consider all sites within Training Area A as contributing to the Hogback Traditional/Sacred Site and any impact of military training to Training Area A as potentially an adverse effect to site 5LA.10930 until we have a greater understanding of which resources do or do not contribute.

With regard to USAG Response #6, we maintain the position stated in our March 1, 2018 letter and our forthcoming letter that sites located within the Hogback/Training Area A should be evaluated as contributing/non-contributing resources to a potential Hogback Traditional/Sacred Site district prior to concurrence on a finding of effect.

With regard to USAG Response #7, we agree that in this case, the deterioration did not change the eligibility determination for site 5LA.4407, and concur that the recommended finding of *no adverse effects* [36 CFR 800.5(d)(1)] is appropriate.

With regard to USAG Response #8, with the additional information provided we concur that the recommended finding of *no adverse effects* [36 CFR 800.5(d)(1)] is appropriate for site 5LA.4991.

With regard to USAG Response #9, our forthcoming letter provides concurrence with the recommended effect finding of *no adverse effects* [36 CFR 800.5(d)(1)] for site 5LA.12500. Our forthcoming letter also concurs with the recommended eligibility determination of *needs data* for site 5LA.2584, and requests that eligibility for this site be determined prior to providing concurrence on effect.

With regard to USAG Response #10, we note our August 10, 2016 letter provided concurrence for merging sites 5LA.2289 and 5LA.2290. In our forthcoming letter, we concur with the recommended eligibility determination of *eligible* for the combined site 5LA.2289, but do not concur with the recommended effect finding. There, we suggest that the cumulative effect of multiple wheeled vehicles driving over these sites either multiple times during one training exercise or during multiple training exercises may constitute an adverse effect; see 36 CFR 800.5(a)(1). For site 5LA.5360, our forthcoming letter provides concurrence with the recommended effect finding of *no adverse effects* [36 CFR 800.5(d)(1)].

Following review of our March 1, 2018 letter, we have several additional corrections to make. Sites 5LA.2435, 5LA.3221, 5LA.4717, 5LA.5659, 5LA.5660, and 5LA.8071 are sites which need additional data in order to make eligibility determinations, but we mistakenly provided concurrence on effect



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findings. In all cases, we erroneously concurred with a recommended finding of *no historic properties affected* [36 CFR 800.4(d)(1)]. As it is unknown if many of these sites are historic properties, we cannot state that a historic property was not affected. If USAG agrees, we would like to have the effect finding for these six sites revised to *no adverse effects* [36 CFR 800.5(d)(1)].

To this point, we have reviewed all of the documentation USAG has submitted to SHPO regarding training exercises at PCMS. Our records indicate that 140 sites have been inadvertently entered by at least one of the four major training exercises. Eligibility determinations and effect findings for 108 of these sites have received concurrence from our office. We request further consultation concerning the 32 remaining sites which lack concurrence. Enclosed is a table of all sites inadvertently entered by the four major training exercises. Sites for which we provide concurrence in this letter are marked by boxing in the row; sites for which concurrence is still needed are shaded.

In sum, the 32 sites without concurrence fall into several categories, as detailed below:

1. Sites which have the cumulative adverse effects of multiple wheeled vehicles driving over these sites either multiple times during one training exercise or during multiple training exercises; see 36 CFR 800.5(a)(1). This includes 5LA.2289, 5LA.3421, 5LA.3459, 5LA.4432, 5LA.5698, and 5LA.12518 (n=6).
2. Sites for which eligibility has not been determined. We suggest that as these sites need additional data in order to make an eligibility determination, there may be adverse effects of inadvertent entry. An adverse effect includes the diminishment of the qualifying characteristics of a property for including in the NRHP and this would include removing information important for making an eligibility determination. This includes 5LA.2317, 5LA.2584, 5LA.3153, 5LA.3300 (as the effects occurred prior to an eligibility determination), 5LA.4431, 5LA.5348, 5LA.5697, and 5LA.8620 (n=8).
3. Sites for which we have not received updated site forms and/or maps and request the re-evaluation forms prior to assessing eligibility and/or effect. This includes 5LA.3123, 5LA.3302, 5LA.3322, 5LA.5008, 5LA.9298, 5LA.9611, and 5LA.12254 (n=7).
4. Sites which may have been adversely affected due to changes in the site boundaries which were not properly marked. This includes 5LA.3411 and 5LA.4437 (n=2).
5. Sites that we disagree with the recommendations and request more information to clarify the recommended position. This includes 5LA.6125, 5LA.12604, and 5LA.12518 (n=3).
6. The Hogback Traditional/Sacred Site (5LA.10930) and potentially associated sites. This includes 5LA.3547, 5LA.5256, 5LA.5375, 5LA.5552, and 5LA.5554 (n=6).

We look forward to continued consultation on eligibility assessments, determinations of effect, and mitigation measures and appreciate the USAG Fort Carson's efforts to prevent continuing adverse effects to the historic properties at PCMS.



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Thank you for the opportunity to comment. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

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

AUG 02 2018

Re: Fort Carson Cultural Resources Management Program 1st Stryker Brigade Combat Team (1SBCT) "Raider Focus" Training Exercise Piñon Canyon Maneuver Site (PCMS), April-May 2017 (HC#72672)

Dear Mr. Rivero-deAguilar:

Thank you for your correspondence dated July 27, 2017 and received by our office on August 7, 2017 requesting concurrence under Section 110 of the National Historic Preservation Act with eligibility determinations for 45 sites impacted by the 1st Stryker Brigade Combat Team Raider Focus Exercise at the Piñon Canyon Maneuver Site (PCMS). We thank you for providing the After Action Report (AAR) and Cultural Resource Re-Visitation Forms (OAHP Form 1405) as agreed upon in the *Programmatic Agreement among U.S. Army Garrison Fort Carson, the 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*.

Following review of the documentation provided, we concur with the following eligibility recommendations (n=37):

- That sites 5LA.2305 and 5LA.5235 are *eligible* for listing on the NRHP under Criterion A—Significant Events/Patterns, Criterion C—Design, and Criterion D—Information Potential.
- That site 5LA.3547 is *eligible* for listing on the NRHP under Criterion A—Significant Events/Patterns, Criterion B—Significant Persons, and Criterion D—Information Potential.
- That sites 5LA.4432 and 5LA.12500 are *eligible* for listing on the NRHP under Criterion A—Significant Events/Patterns and Criterion D—Information Potential.
- That site 5LA.5830 is *eligible* for listing on the NRHP under Criterion A—Significant Events/Patterns, Criterion B—Significant Persons, Criterion C—Design, and Criterion D—Information Potential.
- That site 5LA.2320 is *eligible* for listing on the NRHP under Criterion B—Significant Persons, Criterion C—Design, and Criterion D—Information Potential.
- That sites 5LA.2289, 5LA.2302, 5LA.2313, 5LA.2366, 5LA.3124, 5LA.3144, 5LA.3300, 5LA.3411, 5LA.3420, 5LA.3421, 5LA.3459, 5LA.5360, 5LA.5552, 5LA.5698, 5LA.9611, and 5LA.12518 are *eligible* for listing on the National Register of Historic Places (NRHP) under Criterion D—Information Potential.



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- That sites 5LA.2349, 5LA.3112, 5LA.3114, 5LA.3136, 5LA.3208, 5LA.4430, 5LA.5256, and 5LA.10858 are *not eligible* for listing on the NRHP.
- That sites 5LA.2584, 5LA.3153, 5LA.4437, 5LA.5375, 5LA.5554, 5LA.5697, and 5LA.12254 *need data* before their eligibility for listing on the NRHP can be evaluated.

In reviewing the documentation provided as well as documentation submitted to our office regarding other activities at PCMS, we note that sites 5LA.3322, 5LA.4431, and 5LA.8620 were referenced multiple times in the enclosures, but were not included in the packet of site forms. However, SHPO provided a concurrence on effect in a letter dated March 1, 2018 (HC#71348). We request that additional documentation be submitted for these sites so that eligibility determinations can be made. We also request additional information before eligibility determinations can be made for sites 5LA.3123, 5LA.3302, 5LA.5348, and 5LA.10930. The forms for these sites and the enclosures submitted state that these sites have been re-evaluated, but the re-evaluations have not yet been received by SHPO. We cannot provide concurrence without all the available information, and request that the updated forms are sent to us.

Along with eligibility determinations, we concur with the following findings of effect (n=19) for the 2017 ISBCT Raider Focus Training Exercise:

- That sites 5LA.2320 and 5LA.3124 have *adverse effects* [36 CFR 800.5(d)(2)] due to neglect as the boundaries of the site were not fully marked after it was breached in 2010, allowing additional breaches to occur. Site 5LA.3124 also has *adverse effects* [36 CFR 800.5(d)(2)] due to the cumulative nature of military training exercises at PCMS.
- That site 5LA.5830 has *adverse effects* [36 CFR 800.5(d)(2)] due to neglect as the corrected boundaries were never fully marked and filled in when the site boundaries were adjusted.
- That there were *no historic properties affected* [36 CFR 800.4(d)(1)] by the breaches at sites 5LA.2349, 5LA.3112, 5LA.3114, 5LA.3136, 5LA.3208, 5LA.4430, and 5LA.10858.
- That there were *no adverse effects* [36 CFR 800.5(d)(1)] of the breaches at sites 5LA.2305, 5LA.2313, 5LA.2366, 5LA.3144, 5LA.3420, 5LA.5235, 5LA.5360, and 5LA.12500.

Final eligibility determinations are required before we may comment on possible effects for sites 5LA.3123, 5LA.3302, 5LA.3322, 5LA.4431, 5LA.5348, 5LA.8620, and 5LA.10930. We request additional consultation in order to make both eligibility and effect determinations and findings (n=7). We also request that the maps for site 5LA.9611 be updated to show artifact concentrations before making a determination of effect (n=1).

We *do not concur* with the recommended findings of effect for the remaining 19 sites and make the following observations:

1. Sites 5LA.2289, 5LA.3421, 5LA.3459, 5LA.4432, and 5LA.5698 are recommended to have no adverse effects, but we suggest that the cumulative effect of multiple wheeled vehicles driving over these sites either multiple times during one training exercise or during multiple training exercises may constitute an adverse effect; see 36 CFR 800.5(a)(1). Additionally, we suggest that



as four of these sites have fully Seibert marked perimeters which U.S. Army Garrison Fort Carson (USAG Fort Carson) may need to critically assess the effectiveness of these measures, which may constitute an adverse effect to the historic properties. At site 5LA.2305, a feature was impacted, while at 5LA.2366 Stryker tracks are 35 cm in depth, mixing sediment strata, and at site 5LA.4432 Humvees drove straight through the site. At site 5LA.3421, a Seibert marker was knocked down by a vehicle which entered the site.

2. Site 5LA.2302 is recommended to have no adverse effects, however, in the March 1, 2018 letter from our office (HC#71348), we previously concurred with a recommended finding of *adverse effect* for site 5LA.2302 regarding past site breaches during military exercises. We see no reason to revise that finding, and suggest that similar to the five sites noted above, the cumulative effect of multiple training exercises may constitute an adverse effect.
3. Site 5LA.3153 is recommended to have no adverse effects, but we suggest that as this site needs additional data in order to make an eligibility determination, the effect of a 400 sq. m area of disturbed surface may constitute an adverse effect, as it is unknown if the area that is now disturbed was essential to conveying the property's significance and integrity. As well, this site originally contained a surface hearth that has not been tested or relocated which may have been damaged during Army's use of the property. Please keep in mind that the physical destruction of or damage to all or part of a historic property is considered an adverse direct or cumulative effect.
4. Site 5LA.4431, and 5LA.5697 are recommended to have no adverse effects, but we suggest that as these sites need additional data in order to make an eligibility determination, there may be adverse effects. An adverse effect includes the diminishment of the qualifying characteristics of a property for including in the NRHP and this would include removing information important for making an eligibility determination. None of these sites have protection measures in place, and until eligibility can be determined, we suggest that all needs data sites be treated the same as eligible sites with regards to protection measures. Site 5LA.3300 was a site that needed additional data in 2017 and was determined eligible in 2018 under Criterion D—Information Potential (HC#74013). Similarly, there may have been an adverse effect to the site prior to the eligibility determination and this site should have been protected until the eligibility determination could be completed.
5. Sites 5LA.3411 and 5LA.4437 are recommended to have no adverse effects. We are unable to agree and suggest that as these are two sites where the boundaries have changed without a corresponding change to the markers, and this discrepancy may have resulted in an adverse effect. The decision by USAG Fort Carson not to promptly follow the established protection measures protocol and adjust the perimeter markings have resulted in reasonably foreseeable effects associated with its training.
6. Sites 5LA.3547, 5LA.5256, 5LA.5375, 5LA.5552, and 5LA.5554 are recommended to have no adverse effects, and site 5LA.2584 does not have an effect finding. However, we suggest that these sites – located within the Hogback/Training Area A – should be evaluated as contributing/non-contributing resources to a potential Hogback Archaeological District (see below suggestion). Additionally, we question the adequacy of USAG Fort Carson's administrative-only protection for these sites as well as others that are located in lettered training



areas. These sites are located off of authorized travel corridors within dismounted training areas and largely are unmarked or marked only at the property corners. As Humvees and Strykers regularly deviate from the authorized travel corridors within dismounted training areas additional protection measures are needed. We request continued consultation to find a better way to avoid or minimize effects to these sites in the dismounted training areas.

7. Site 5LA.12254 is recommended to have no adverse effects, but the re-visitation form does not include a map of the site. We cannot assess effects without a site map and request one.
8. Site 5LA.12518 is recommended to have no adverse effects, but also cites that Strykers drove through an artifact scatter that can be seen in and around the tracks. At 35 cm deep, these tracks would have mixed any subsurface archaeological deposits in the area and we believe this may constitute an adverse effect.

We request further consultation concerning the eligibility determinations for the nine sites listed above and the effect findings for the ten sites that we were not able to assess eligibility recommendations for, as well as the 21 sites for which we did not concur with the recommended effect findings.

We offer several suggestions for consideration as you further develop plans to avoid, minimize, and mitigate adverse effects to historic properties. First, we suggest that it become a priority to document and clearly define/delineate the Hogback Traditional/Sacred Site (5LA.10930). This site is currently outlined as the boundaries of Training Area A, within which a number of sites and isolated finds likely contribute to the eligibility of this larger resource. Stipulation VI-B of the *Programmatic Agreement Regarding Military Training and Operational Support Activities Down Range Fort Carson* requires that a Native American ethnographic oral history project specific to Fort Carson and PCMS be conducted. We are curious as to the status of this project and how it may assist in mitigation for sites within Training Area A. Because the Hogback is most appropriately understood as an archaeological district, properties which are found to contribute to the historical context of an NRHP-eligible district are treated as eligible for listing to the NRHP. It is imperative that the contributions of individual sites to the Hogback district be understood in order to better assess necessary protection measures within Training Area A. Blythe (2008:44-71; MC.DA.R23) provides a summary of Native American consultation concerning the Hogback and may be a good place to start in creating a site form for 5LA.10930. We understand that consultation with Indian tribes is ongoing, and while sacred sites do not need formal recording or SHPO concurrence in order to be protected in the same manner as NRHP-eligible sites, until an agreement between USAG Fort Carson and the tribes is reached, we feel that it is appropriate to consider all sites within Training Area A as contributing to the Hogback Traditional/Sacred Site and any impact of military training to Training Area A as potentially an adverse effect to site 5LA.10930 until we have a greater understanding of which resources do or do not contribute.

Second, we suggest that a critical look at the effectiveness of various protection measures may be helpful. Several ways in which different marking methods could be improved were noted on page 4 of the After Action Report, and we believe many of these will aid in protecting cultural resources. We look forward to the upcoming Resource Protection Project (HC#74451). We would like to further examine the effectiveness of the administrative protections afforded to the lettered Training Areas and the Interior Fence however. We feel that administrative only measures may not be the most effective option, and



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suggest that in many of these areas it may be useful to place Seibert or Carsonite markers around sites as well.

Third, while we look forward to seeing how simplifying the symbols in the digital maps will help soldiers determine where sites are, we are concerned with the statements that not all tactical vehicles have the capabilities to use digital maps and that soldiers on the "opposing force" must turn their digital maps off in order to remain hidden. Is there any way in which soldiers within both forces can utilize digital maps? Could two separate networks be established between vehicles—one for the friendly troops and one for the opposing force—or would it be possible to allow soldiers in the opposing force to utilize a simplified version of the digital map that won't broadcast their location to others? We feel that an alternative that does not necessitate turning digital maps off should be found.

We look forward to continued consultation on eligibility assessments, determinations of effect, and mitigation measures and appreciate the USAG Fort Carson's efforts to prevent continuing adverse effects to the historic properties at PCMS.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us.

Sincerely,

Steve Turner, ALA
State Historic Preservation Officer

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OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

Hal K. Alguire
Director of Public Works
US Army Installation Management Command
Directorate of Public Works
1626 Evans Street, BLDG 1219
Fort Carson, CO 80913-4143

SEP 14 2018

Re: Ongoing Consultation Concerning Determinations of Eligibility and Effect for Past Brigade Trainings at the Piñon Canyon Maneuver Site (PCMS) (HC#71348)

Dear Mr. Alguire:

Thank you very much for the September 12, 2018 meeting at our office with Wayne Thomas and Jennifer Kolise. We greatly appreciate the time they took to meet with us and found the conversation to be very productive and enlightening. We look forward to more conversations such as that as we move forward in the consultation process towards mitigation of adverse effects of past brigade trainings by US Army Garrison Fort Carson (USAG Fort Carson) at the Piñon Canyon Maneuver Site (PCMS).

We would like to thank your staff for bringing several issues to our attention during that meeting. In particular, it was noted that there have been conflicting statements from our office concerning concurrence of eligibility and effect for several sites. This letter is intended to correct those conflicting statements and summarize the consultation on the remaining sites for which we have not concurred to date.

Site 5LA.2289 was combined with site 5LA.2290, which our office concurred with on August 10, 2016 (HC#69680). The site was determined *eligible* by USAG Fort Carson, which our office concurred with both on August 10, 2016 and August 2, 2018 (HC#72672). USAG Fort Carson recommended an effect finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise, which our office concurred with on March 1, 2018 (HC#71348). In the March 1, 2018 letter, our office questioned the appropriateness and justifications for merging sites 5LA.2289 and 5LA.2290 however, and requested additional information concerning the justification for combining these two sites.

Site 5LA.3300 was impacted by the 2017 training exercise. The site was determined *eligible* by USAG Fort Carson, which our office concurred with both on April 25, 2018 (HC#74013) and August 2, 2018 (HC#71348). In our March 1, 2018 letter (HC#71348), our office requested additional information and full resource documentation in order to assess the effect finding. Following additional information, our office concurred with the effect finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise on April 25, 2018 (HC#74013).

Site 5LA.3302 was determined *eligible* based on a 1984 site form in our records on September 8, 2014 (HC#65835). The site form submitted with the after action report for the 2017 training stated that this site is "critical for reevaluation," a statement which our office concurs with as the site has not been recorded to modern standards and the site documentation with our office does not have the level of detail that we require. On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). We maintain our request that this site be prioritized for reevaluation and that reevaluation include a discussion of whether or not this site may contribute to the Hogback Traditional Site (5LA.10930; Blythe 2008:43-45), and are very interested to hear the results that will come from the proposed 2019 holistic study of the Hogback Traditional Site.



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Site 5LA.3322 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on February 1, 2012 (HC#60904). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). Our August 2, 2018 letter noted that a site re-visit form was not submitted with the maps and photographs for this site, and in the future we request that site forms be included for all sites submitted to our office, even those with minimal affects such as this (displaced Seibert marker).

Site 5LA.3332 was determined officially *not eligible* by USAG Fort Carson, which our office concurred with on February 1, 2012 (HC#60904). On March 1, 2018, we concurred with the finding of *no historic properties affected* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). We were unaware that our August 2, 2018 letters referenced site 5LA3332, and believe that was likely a numerical mistake on our part.

Site 5LA.3411 was determined *eligible* by USAG Fort Carson, which our office concurred with on March 10, 1999. On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). During a 2016 site visit, Swan and Stell both noted that the site was mis-plotted and the incorrect area was fenced and protected. We suggested in the August 2, 2018 letter (HC#71348) that there may be cumulative adverse effects to this site due to the site boundaries not being accurately marked.

Site 5LA.3421 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on February 28, 2011 (HC#58008). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). However, this site was impacted prior to monitoring of training exercises as well as during the 2010, 2013, and 2017 training exercises at PCMS. As we move towards the formation of a holistic mitigation plan for cultural resources at PCMS, we suggest that this may be a site to consider, as there may be cumulative effects of multiple wheeled vehicles driving over the site during multiple training exercises.

Site 5LA.3459 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on March 1, 2018 (HC#72672). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013).

Site 5LA.3547 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on June 11, 1997 (HC#26435). The site has not been re-recorded since. On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). We maintain our request that this site be prioritized for reevaluation and that reevaluation include a discussion of whether or not this site may contribute to the Hogback Traditional Site (5LA.10930; Blythe 2008:43-45), and are very interested to hear the results that will come from the proposed 2019 holistic study of the Hogback Traditional Site. We feel that this is particularly important as this site was also impacted by the 2018 training exercises.

Site 5LA.4431 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on February 1, 2012 (HC#60904). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). Our August 2, 2018 letter noted that a site re-visit form was not submitted with the maps and photographs for this site, and in the future we request that site forms be included for all sites submitted to our office, even those with minimal affects such as this.



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Site 5LA.4432 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on February 29, 2012 (HC#60388). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013).

Site 5LA.5552 was determined *eligible* USAG Fort Carson, which our office concurred with on September 15, 2014 (HC#65835). The site form submitted with the after action report for the 2017 training stated that this site is "critical for reevaluation," a statement which our office concurs with as the 2017 form notes the presence of an unrecorded rock art panel and other features. On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). We maintain our request that this site be prioritized for reevaluation and that reevaluation include a discussion of whether or not this site may contribute to the Hogback Traditional Site (5LA.10930; Blythe 2008:43-45), and are very interested to hear the results that will come from the proposed 2019 holistic study of the Hogback Traditional Site. We feel that this is particularly important as this site was also impacted by the 2018 training exercises.

Site 5LA.5698 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on April 25, 2018 (HC#74013). On April 25, 2018, we also concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013).

Site 5LA.8620 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on November 30, 2001. On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). Our August 2, 2018 letter noted that a site re-visit form was not submitted with the maps and photographs for this site, and in the future we request that site forms be included for all sites submitted to our office, even those with minimal affects such as this.

Site 5LA.9611 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on April 13, 2012 (HC#60388). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). Our August 2, 2018 letter noted that artifact concentrations which were referenced in the site forms were not included on the maps submitted to our office and requested that these maps be updated.

Site 5LA.12254 was determined to *need data* by USAG Fort Carson, which our office concurred with on April 13, 2012 (HC#60388). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). Our August 2, 2018 letter noted that a map of the site was not included with the site form and requested that it be forwarded to our office.

Site 5LA.12518 was determined officially *eligible* by USAG Fort Carson, which our office concurred with on April 13, 2012 (HC#60388). On March 1, 2018, we concurred with the finding of *no adverse effect* for the 2017 ISBCT "Raider Focus II" Training Exercise (HC#74013). Our August 2, 2018 letter noted that due to the depth of the rutting associated with the 2017 training exercises, there may be additional cumulative and indirect adverse effects to this site.

We regret that the information in our database concerning sites 5LA.2435, 5LA.3221, 5LA.4717, 5LA.5659, 5LA.5660, and 5LA.8071 was not updated following our August 8, 2016 letter (HC#69860) to reflect concurrence on eligibility determinations of *not eligible* for these six sites. In light of this prior concurrence on eligibility, our March 1, 2018 concurrence with a finding of *no adverse effect* is correct (HC#73148). We apologize for the confusion.



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With the conflicting statements resolved, only 16 sites that were impacted by the 2010, 2013, 2015, and/or 2017 training exercises at PCMS remain that do not have concurrence. These are sites 5LA.2317, 5LA.2584, 5LA.3123, 5LA.3153, 5LA.4437, 5LA.5008, 5LA.5256, 5LA.5348, 5LA.5375, 5LA.5554, 5LA.5697, 5LA.6125, 5LA.9298, 5LA.10930, 5LA.12604, and 5LA.13528. As noted in our August 2, 2018 letter (HC#71348), the sites without concurrence fall into several categories, as detailed below:

1. Sites for which eligibility has not been determined. We suggest that as these sites need additional data in order to make an eligibility determination, there may be adverse effects of inadvertent entry. An adverse effect includes the diminishment of the qualifying characteristics of a property for including in the NRHP and this would include removing information important for making an eligibility determination. This includes 5LA.2317, 5LA.2584, 5LA.3153, 5LA.5348, 5LA.5697, and 5LA.13528 (n=6).
2. Sites for which we have not received updated site forms and/or maps and request the re-evaluation forms prior to assessing eligibility and/or effect. This includes 5LA.3123, 5LA.5008, and 5LA.9298 (n=3)
3. Sites which may have been adversely affected due to changes in the site boundaries which were not properly marked. This includes 5LA.4437 (n=1).
4. Sites that we disagree with the recommendations and request more information to clarify the recommended position. This includes 5LA.6125, 5LA.12604, and 5LA.12518 (n=3).
5. The Hogback Traditional/Sacred Site (5LA.10930) and potentially associated sites. This includes 5LA.5256, 5LA.5375, and 5LA.5554 (n=3).

We look forward to continued consultation on eligibility assessments, determinations of effect, and mitigation measures and appreciate the USAG Fort Carson's efforts to prevent continuing adverse effects to the historic properties at PCMS.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Lindsay Johansson, Section 106 Compliance Manager, at (303) 866-4678 or lindsay.johansson@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer



OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

APR 09 2018

Hal K. Alguire
Director of Public Works
Department of the Army
US Army Installation Management Command
Directorate of Public Works
1626 Evans Street, Building 1219
Fort Carson, Colorado 80913-4143

To: Environmental Division
ATTN: Wayne Thomas

Re: Archaeological Investigations Conducted at Site 5LA10858, Pinon Canyon Maneuver Site, Las Animas, Colorado (HC #64252)

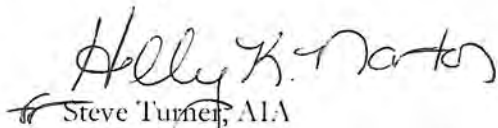
Dear Mr. Alguire:

We received your correspondence dated March 20, 2018 on March 21, 2018 requesting additional consultation under Section 106 for site 5LA10858. Your letter follows earlier requests by our office for synthetic reporting of archaeological work completed at the subject property in 2005 and 2014.

Following our review of the report titled *Archaeological Investigations Conducted at Site 5LA10858, Pinon Canyon Maneuver Site, Las Animas, Colorado*, we concur with your determination that site 5LA10858 is not eligible for listing to the National Register of Historic Places under any criteria. Consequently, we concur with your finding of no historic properties affected as it relates to the 2017 1st Stryker Brigade Combat Team "Raider Focus" Training for this property.

We thank you for the opportunity to comment. If we may be of further assistance, please contact Mark Tobias, Intergovernmental Services Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,


Steve Turner, AIA
State Historic Preservation Officer
ST/mt

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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

March 28, 2018

Office of the Director

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

Dear Mr. Turner:

Enclosed are the Colorado Cultural Resource forms for 18 sites evaluated during the 2017 evaluation project at the Piñon Canyon Maneuver Site completed between the spring and summer of 2017 (CF2017-004).

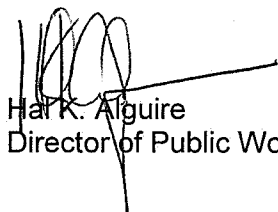
The Cultural Resources Manager has determined 6 of the 18 sites are eligible for inclusion in the National Register of Historic Places; and 12 are ineligible. The Smithsonian trinomial, 5LA5697, should be retired, since this site has been subsumed by 5LA10840. In accordance with Section 110 of the National Historic Preservation Act, the USAG Fort Carson requests concurrence with the determinations of eligibility for these 18 resources. Enclosure 1 lists the 18 sites, including site type, site theme, and determination of eligibility.

The sites listed in Enclosure 2 have been the subject of ongoing Section 106 consultation related to past brigade training exercises at the PCMS: 2010 2-4 Brigade Combat Team (BCT) "Warhorse Rampage" Training Exercise; 2013 2-4 BCT "Warhorse Charge" Training Exercise; 2015 1st Stryker Brigade Combat Team (1SBCT) "Raider Focus I" Training Exercise; and 2017 1SBCT "Raider Focus II" Training Exercise. In addition to concurrence with our determinations of eligibility for these sites, the USAG is also requesting concurrence with determinations of effect related to the military training exercises.

Also included in this submission are the report of investigations entitled, *Archaeological Site Assessment and Re-Evaluation for 18 Sites at Piñon Canyon Maneuver Site, Las Animas County, Colorado*, supplemental digital reports, associated site documentation, and geographic information system (GIS) spatial data.

The point of contact for this matter is Jennifer Kolise, Cultural Resources Manager, jennifer.r.kolise.civ@mail.mil, 719-526-4484.

Sincerely,


Mark K. Alguire
Director of Public Works

Enclosures

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OFFICE of ARCHAEOLOGY and HISTORIC PRESERVATION

Rec'd 1 MAY 2018
HA

Hal K. Alguire
Director of Public Works
US Army Installation Management Command
Directorate of Public Works
1626 Evans Street, Bldg. 1219
Fort Carson, CO 80913-4143

APR 25 2018

Re: 18 Sites Evaluated During the 2017 Evaluation Project (CF2017-004) (HC #74013)

Dear Mr. Alguire:

Thank you for your correspondence dated March 28, 2018 and received on March 30, 2018 by our office initiating consultation under Section 106 and 110 of the National Historic Preservation Act as a part of the annual evaluation of cultural resources and ongoing consultation for past training exercises at PCMS.

We concur with your determination that sites 5LA.3269, 5LA.3300, 5LA.3384, 5LA.4399, 5LA.4950, and 5LA.5698 are eligible for listing to the National Register of Historic Places (NRHP). All properties were found eligible for listing under criterion D, with 5LA.3384 also consisting of archaeological data that may provide insights to the late prehistoric Apishapa phase (criterion A). We also concur with your determination that sites 5LA.3200, 5LA.3202, 5LA.3204, 5LA.3208, 5LA.3250, 5LA.3254, 5LA.3266, 5LA.4430, 5LA.5699, 5LA.10840, 5LA.12588, and 5LA.12589 (including segment 5LA.12589.1) are not eligible for listing to the NRHP.

Following review of the assessment of adverse effects, we concur with your finding of no historic properties affected [36 CFR 800.4(d)(1)] for sites 5LA.3208, 5LA.3254, 5LA.4430, and 5LA.12588. We concur with your finding of no adverse effect [36 CFR 800.5(d)(1)] for site 5LA.3300, 5LA.3384, 5LA.4399, 5LA.4950 and 5LA.5698.

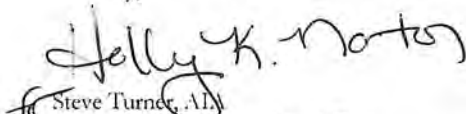
We do not concur with your determination for site 5LA.10840 and we request additional information regarding the evaluation of a traditional cultural property (TCP) at this location. As we understand, archaeological materials do not conclusively support 5LA.10840 as a TCP, but this fact is not the only one to consider when evaluating a property for this type of designation. Research must also be considered with consultation amongst those tribes that may ascribe significance to the landscapes found within PCMS (Stout 2002:75). National Register Bulletin 38 also speaks to these efforts, under the "Reconciling Sources" section of the bulletin (Parker and King 1990). We request further consultation regarding 5LA.10840, with potentially affiliated tribes also provided the opportunity to comment specifically on the determination of the property for eligibility to the NRHP and consideration as a possible TCP.

Should unidentified archaeological resources be discovered in the course of the project, work must be interrupted until the resources have been evaluated in terms of the National Register eligibility criteria (36 CFR 60.4) in consultation with our office pursuant to 36 CFR 800.13. Also, should the consulted-upon scope of the work change please contact our office for continued consultation under 36 CFR 800.

Please remember that the consultation process does involve other consulting parties such as local governments and Tribes, which as stipulated in 36 CFR 800.3 are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Edward Jakaitis, Section 106 Compliance Manager, at (303)866-4678 or edward.jakaitis@state.co.us.

Sincerely,


Steve Turner, AIA
State Historic Preservation Officer
1200 Broadway
Denver, Colorado 80203

OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION

303-866-3392 * Fax 303-866-2711 * E-mail: oaahp@state.co.us * Internet: www.historycolorado.org

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