

The following presents the Fiscal Year (FY) 2022 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 (66 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 (73 pages)*
- 3) *Programmatic Agreement among U.S. Army Garrison Fort Carson, Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado, as amended (104 pages)*

**FISCAL YEAR (FY) 2022 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, 2022**

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, 2021, through September 30, 2022, and is formatted in accordance with Appendix D. It only discusses the areas of potential effects (APEs) covered by the Fort Carson Built Environment PA. It has been distributed electronically to the SHPO and concurring parties and is available online at: <https://home.army.mil/carson/index.php/Directorate/directorate-public-works/nepa-and-cultural-resources-documents>.

## **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, 2021, and September 30, 2022. One hundred seventy-seven undertakings were reviewed that were considered exempted in accordance with Appendix C of the Fort Carson Built Environment PA.

## **II. Non-Exempted Undertakings**

Table 2 of Enclosure 1 lists all reviewed undertakings that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA) during the reporting period. Eleven undertakings required Section 106 consultation. Section 106 consultation has been completed for eight undertakings (2022-003, 2022-068, 2022-069, 2022-070, 2022-229, 2022-124, 2022-282, 2022-245 and 2021-295).

Consultation has not been initiated for one undertaking (2022-041) to repair a waterline at the Olympic Shooting Center in the Bird Farm of Fort Carson. The survey of the APE is still underway.

2022-043 Off-installation Low-Elevation Flight Training consultation was initiated in November 2021. Responses have been received from the State Historic Preservation Officer, Pike-San Isabel National Forest & Cimarron and Comanche National Grasslands, Edgar Ranches LLC, Huerfano County Commissioners, Las Animas County Commissioners, Not 1 More Acre!, Otero County Commissioners, Santa Fe Trail

Association, Pawnee Nation of Oklahoma, Northern Cheyenne Tribe, and the National Park Service's National Trails Intermountain Region. On June 30, 2022 the Advisory Council for Historic Preservation and the State Historic Preservation Officer were notified that there was a potential that the low-level routes had been used for training before consultation was completed. The Fort Carson's responses to the initial consultation notification were delayed by the investigation into the matter. Review of over 1,100 flight plans revealed that there was no low-level aviation training along the proposed Routes Saber, Comanche, Mustang or Gambler. Route Hawk, which is substantially the same as Routes Mustang and Gambler (and for which NHPA Section 106 consultation and NEPA evaluation have been completed), has used for all low-level aviation training flights from Fort Carson. The ACHP was notified of the findings on August 31, 2022. Consultation is on-going on this undertaking.

The following is an update to the status of Section 106 consultation continuing from the fiscal year 2021 reporting period:

- 2019-259 and 2021-054/073/309 Prescribed Fire and Wildland Fuels Reduction Plan, Fort Carson and PCMS: Section 106 consultation is still ongoing for APEs in Bird Farm Recreation Area, Turkey Creek Complex, and Wildlife Demonstration Area.
- 2021-010 Repair Leak in Basin of Spring Branch Reservoir: This project has been pushed to 2025, therefore, Section 106 consultation has not been initiated. An inventory and evaluation of Spring Branch Reservoir and Ditch was completed as part of a larger irrigation network historic context study, but the CRM has determined more fieldwork and archival research is required prior to making a determination of eligibility.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRMP. These 29 undertakings with no potential to affect historic properties including document reviews, non-destructive land surveys and changing Soldier stationing assignments and other undertakings.

### **III. Actions Update**

#### ***A. Cultural Resources Awareness Training***

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

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit.
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; a
- Cultural Resources Awareness Video

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

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

Cultural surveys have been conducted for (2022-041) to repair a waterline at the Olympic Shooting Center. The archival research that will aid in the determinations of eligibility and finding of effects are on-going. Information on the results of the survey will be provided with the initial consultation notification for the undertaking. There were no other cultural resource surveys conducted within the APEs during the reporting period.

### *C. Exempted Undertakings*

See Table 1 of Enclosure 1. As of September 30, 2022, 177 undertakings were reviewed that are considered to be exempted undertakings in accordance with Appendix C of the Fort Carson Built Environment PA.

### *D. Expanding the APEs for Exempted Undertakings*

The APEs have not been expanded during the reporting period.

### *E. Inadvertent Discoveries*

There were no inadvertent discoveries during the reporting period.

### *F. Emergency Response per 36 CFR 800.12*

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

- Incident No. 2022-01146: Fire was reported at 1050 Titus Boulevard on Fort Carson's cantonment, just behind the Cheyenne Mountain Golf Course on April 15, 2022. The suppression activities concluded the same day. The fire was about 3.6 acres and no historic properties were within the fire footprint.
- Incident No. 2022-01846: The fire was reported at 7810 Bad Teolz Road on Fort Carson's cantonment on May 9, 2022. The fire was less than 0.1 acres. There were no historic properties in the fire footprint.

### *G. Amendment*

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



A Third Amendment to the Fort Carson Built Environment PA that extends the duration of the PA until December 31, 2021, was executed on December 18, 2021. A fourth amendment is proposed to extend the PA until December 31, 2025, to allow time for the Army Alternate Procedures consultation to be completed. These efforts have been slowed due to staff shortages, but the USAG Fort Carson is continuing with this effort.

#### *H. Dispute Resolution*

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

Report compiled by:

Angie Bell  
Chief, NEPA and Cultural Resources Management

Approved by:

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John Wachter  
Chief, Environmental Division

**ENCLOSURE 1:**  
**ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY22 REPORTING PERIOD (OCTOBER 1, 2021, THROUGH SEPTEMBER 30, 2022) 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
2022-002 Cantilevered Gate and Wall Area Repair, Bldg. 1800	CIV21-048	Main Post	BE I.A2	10/6/2021	Proposed work includes: repairing the exterior wall and cantilever chain link gate in the rear of the building near the loading dock.
2022-004 Storm Water Mitigation at Bulk Fuel Site, Bldg. 9650	CIV21-018	Main Post	BE I.A2 BE I.B2	10/6/2021	Proposed work includes: replace culverts on east side of facility; regrade drainage swale to both north and south of the facility; create a berm around the site to mitigate flooding and accommodate increased run off from hardstands and surrounding areas.
2022-005 Slab Replacement and Landscaping, Bldg. 1526	GAR21-013	Main Post	BE I.A2 BE I.A3 BE I.B3	10/6/2021	Proposed work includes: demolishing existing concrete slab and replacing with a slab on grade that is in line with the elevation of the adjoining sidewalk; replace sidewalk outside of the entrance of building; re-landscaping the perimeter of the building with a small decorative retaining wall filled with native stones; plant small drought-resistant shrubbery; and remove some trees.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-006 Repair Parking Lots, Bldgs. 7500, 7503, & 7505	DPW21-058	Main Post	BE I.A2	10/6/2021	
2022-007, 2022-064, 2022-287 Repair Erosion, Bldg. 7424	DPW19-066	Main Post	BE I.B2	10/6/2021, 12/28/2021, 09/26/2022	Original Proposed work included: removing debris and sediment; and install armor channel with rip rap to provide protection. Imported fill, retaining wall, or gabion baskets to stabilize bank may be required. The scope of work was changed to: removing debris and sediment in drainage channel; armoring channel with rip rap; if necessary, importing fill or installing retaining wall or gabion baskets
2022-011 Demolish Zipper Parking on Taxiway and Complete Re-seeding Work, Butts Army Airfield (BAAF)	BAA20-002	Main Post	BE I.A3 BE I.B3	10/13/2021	Proposed work includes: demolish approximately 2 acres of asphalt; remove concrete pad; and re-seeding approximately 7 acres of the area.
2022-012 & 2022-122 Expand Exiting RV Storage Lot at Gate 20, Fort Carson	MWR12-013	Main Post	BE I.A1 BE I.A2 BE I.B3	10/13/2021	Proposed work includes: expand storage lot by approximately 5 acres; and install additional ingress/egress. fence, and lighting.  An environmental assessment (EA) has been completed in May 2022.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-015 Perform Geotechnical Investigation North of Bldg. 8300, Fort Carson	CIV22-001	Main Post	BE I.A1	10/21/2021	Proposed work includes: conducting 8 borings to determine if the site is suitable for siting distributed generation resources.
2022-017 Installation Spartan Run, TA Bravo, Fort Carson	4ID22-001	Main Post	BE I.A1 BE I.B1	10/21/2021	
2022-019 Asbestos Abatement, Bldg. 1851	CIV21-036	Main Post	BE I.A2	10/20/2021	Prior to the renovation of the new commissary kitchen in Bldg. 1851, asbestos abatement of the floor tile, mastie, transite wall panel, joint compound, water pipe returns, roof flashing, and mechanical room pipe insulation jacket needs to be completed.
2022-020 Relocate Amplifier and Replace Feeder Cables, Bldg. 2075	MWR22-002	Main Post	BE I.A1 BE I.A2	10/21/2021	Relocate amplifier from Bldg. 2075 to Bldg. 2070 and replace two feeder lines to Bldgs. 2071 & 2074.
2022-021 Repair Water System at Turkey Creek Ranch	SO1180654	Turkey Creek Complex	BE I.D1b	10/25/2021	Proposed work includes: excavating and repairing the domestic water line valve and yard hydrant south and east of Bldg. 10017.
2022-024 Repair Concrete Driveway, Bldg. 8930`	RES21-001	Main Post	BE I.A2 BE I.B2	10/25/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-026 Prairie Dog Control FY22, Fort Carson and PCMS	DPW22-002	Main Post  Downrange Fort Carson  PCMS Cantonment  PCMS Numbered TAs	BE I.B3 FC D2b PC A3b PC B4b2	11/9/2021 8/31/2022	<p>Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; Wilderness Rd./TA 5; Ranges 11, 24, 29, 45, 57, 104, 109, 117, 119, 121C, 127, 127A, 139, 151, &amp; 155; and Turkey Creek Complex on Fort Carson; the 11A MOUT site (4 Corners); TA10C Pipeline East; MSR1 &amp; County Rd. 76.1; MSR 3 Pipeline South; and DZ Pronghorn at PCMS; and PCMS Airfield.</p> <p>Section 106 consultation was completed in July 2019 for the Turkey Creek Complex as part of NEPA Project No. 2019-168.</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
2022-027 Post-wide Signal System Upgrade, Fort Carson	DPW21-048	Main Post	BE I.A2	11/4/2021	Proposed work includes: procure, install, program, troubleshoot, and warrant hardware and software to upgrade signaled intersections; replace 16 traffic signal cabinets; install 27 new controllers and software; replace 29 radios and antennae; replace 17 sensors with microwave sensors; and install center system server, including licenses and support.
2022-028 Post-wide Sidewalks Project, Fort Carson	DPW21-027	Main Post	BE I.A1 BE I.A2 BE I.B3	11/4/2021	
2022-032 Modify Outlets from 4-Pin to 8-Pin, Bldg. 2655	3BD22-001	Main Post	BE I.A2	11/5/2021	
2022-033 Ambulatory Care Center, Wilderness Rd., Fort Carson	PN80411	Main Post	BE I.A1 BE I.B3	11/8/2022	2022-033 is the review of 20% design and request for proposals (RFP) for the new Soldier Centered Medical Home (SCMH).
2022-034 Clean Out Drainage Ditch, Bldg. 300	SO1183336	Main Post	BE I.B2	11/9/2021	
2022-035 Repair Sediment Track, Bldg. 2705	DPW21-054	Main Post	BE I.A1 BE I.B2	11/9/2021	
2022-036 Repair Water System near Bldg. 10012	SO1186034	Turkey Creek Complex	BE I.D1b	11/9/2021	Proposed work includes: excavating along the water line near Bldg. 10012 to determine the location of water loss to the building and repair.
2022-038 Install Stormwater Sample Device, Bldgs. 300 & 3901	DPW22-003	Main Post	BE I.B2	11/24/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-039 Repair Water Intrusion in 10 SFG Facilities, Bldgs. 7416, 7418, 7450, & 7462	SFG21-012	Main Post	BE I.A2	11/23/2021	Proposed work includes: repair building envelope to stop water from running between the facade and the CMU block structure; repair water damage; repair or replace improperly installed water; perform survey, including mold testing, to evaluate damage; and repair or replace failing gutters and snow guards above door ways to prevent snow damage to the roof and prevent snow from entering the building.
2022-040 Plant Trees at Patriot Elementary School, Bldg. 6205	DPW22-005	Main Post	BE I.B3	11/29/2021	
2022-042 Geotechnical Exploration for the Proposed Ambulatory Care Clinic	MED22-001	Main Post	BE I.A1	11/30/2021	Proposed work includes: drill a total of 9 bores to approximately 20 feet below surface grade with a truck mounted drill rig; and take soil samples at selected intervals for the proposed Ambulatory Care Clinic.
2022-044 Install New Air Fryer/Combo Ovens in Dining Facilities, Bldgs. 1444, 2330, 7481, & 9439	CIV22-008	Main Post	BE I.A1	12/1/2021	



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-045 Construct Vehicle Tracking Control at 4th CAB Container Yard, BAAF	BAA21-017	Main Post	BE I.A1 BE I.B2	12/6/2021	Proposed work includes: construct an approximate 0.85 acre aggregate parking lot SE of Bldg. 9622; and construct a 20 feet long by entrance width Vehicle Tracking Control (VTC) to prevent the tracking of erodible soil into the adjacent storm drain.
2022-046 Install Electric Box, Bldg. 9635	BAA22-002	Main Post	BE I.A2	12/8/2021	
2022-049 Install Fiber Optic Cables, Multiple Bldgs., Fort Carson	SFG21-018	Main Post	BE I.A2	12/8/2021	
2022-051 Gate 19 Utilities, Fort Carson	DPW21-036	Main Post	BE I.A1 BE I.A2	12/14/2021	Proposed work includes: install 6" diameter HDPE butt-fused water line from Bldg. 9690 to Bldg. 9702; install 2 toilets and 2 sinks in Bldg. 9702; abandon existing holding tank under Bldg. 9702; install new 1500 gallon septic holding tank with volume alarms (audio and visual indicators) adjacent to Bldg. 9702; and construct approximately 1 mile of new waterline to gate 19.
2022-052 Renewal of Easement to CenturyLink, Wilderness Rd., Fort Carson	n/a	Main Post	BE I.A1 BE I.A2	12/14/2021	
2022-053 Renewal of Easement to CenturyLink, Bldg. 1512	n/a	Main Post	BE I.A1 BE I.A2	12/14/2021	
2022-054 Renewal of Easement to CenturyLink, Bldg. 6110	n/a	Main Post	BE I.A1 BE I.A2	12/14/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-055 Construct Passive Barriers, Gates 3, 6, & 19, Fort Carson	DPW22-004	Main Post	BE I.A1 BE I.A2 BE I.A3 BE I.B3	12/14/2021	Proposed work includes: placing passive barriers such as a combination of large granite boulders, metal bollard, or metal gates at Gates 3, 6, and 19; re-route tank trail and construct new concrete tank trail crossing near Gate 19; and stabilize and restore abandoned trail to vegetative cover.
2022-056 Install Pedestrals, Bldgs. 1450 & 1453	4ID21-009	Main Post	BE I.A2	12/14/2021	
2022-057 Repair Roof on Building at Range 72, Fort Carson	DPW21-042	Main Post	BE I.A2	12/14/2021	
2022-059 Replace Carpet, Bldg. 1130	MED20-012	Main Post	BE I.A2	12/21/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-060, 2022-134, 2022-228 FY22 Quarterly Advisory REC for Training on FC and PCMS	DPT22QRT2, DPT22QRT3 DPT22QTR4	Main Post  Downrange Fort Carson  PCMS Numbered TAs  PCMS Lettered TAs  PCMS Training Area A	BE I.C3 FC A FC B FC C PC B1 PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/21/2021 3/21/2022 6/27/2022	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.
2022-062 Construct Addition/Repair Climbing Tower, Bldg. 7471	SFG21-013	Main Post	BE I.A2	12/28/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-063 & 2022-072 COARNG and Geotechnical Investigation COARNG Maintenance Building, Fort Carson	TEN22-002	Main Post	BE I.A1	12/27/2021 1/10/2022	2022-063 is the 100% design review.  2022-072 is to perform a geotechnical investigation to gather soil information for foundation design of the maintenance building.
2022-065 Repair Hardstand, Bldg. 8030	DPW21-040	Main Post	BE I.A2	12/28/2021	
2022-073 Complete Crack Seal Roads Post-wide, Fort Carson	DPW21-045	Main Post	BE I.A2	1/10/2022	
2022-076 JOC Video Wall Power Upgrade, Bldg. 1435	4ID22-005	Main Post	BE I.A2	1/12/2022	
2022-078 Building 1040 Renovation, Fort Carson	DPT20-015	Main Post	BE I.A2	1/12/2022	Proposed work includes: demolition of kitchen area, walls for new room configuration, air handling equipment, and exhaust fans; build out old kitchen into room with double door; install multiple power outlets, 4-data drops, and phone connection; build out offices, conference room, breakroom, 2 photo studios, editing rom, equipment room, reception, and large storage room; replace plumbing fixtures in restrooms; and replace air handler and condenser, ductwork, and diffusers.
2022-080 Install Crosswalk Beacon at Butts-Airfield Rd., Fort Carson	DPW22-020	Main Post	BE I.A2	1/13/2022	
2022-081 Install Fire Extinguisher Brackets in Arms Room, Bldg. 1958	SPC22-022	Main Post	BE I.A2	1/28/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-084 Install Type II Heat Exhaust at AAFES Wilderness Express, Bldg. 9478	CIV22-009	Main Post	BE I.A2	1/28/2022	Proposed work includes: install type II heat exhaust hood over Hunt Brothers Pizza ovens; and modify existing electrical as required for the new type II heat exhaust hood.
2022-086 Parking Lot Repair, Bldg. 1200	DPW21-047	Main Post	BE I.A2	1/28/2022	
2022-087 Maintenance on Fence and Embankment at Gate 2, Fort Carson	SO11997185	Main Post	BE I.A2 BE I.B2	2/3/2022	Proposed work includes: removing sediment and trash from fence along HWY 115; add rip rap armor to the embankment to prevent further erosion; and use sediment control and hydromulching to minimize erosion impacts.
2022-088 Remove Carpet and Restore to Original Concrete Finish, Bldg. 9620	RES22-001	Main Post	BE I.A2	2/3/2022	
2022-089 Install Electric Hard Wire, Bldg. 9630	BAA22-003	Main Post	BE I.A2	2/3/2022	
2022-090 Building 1959 South Yard Upgrades	SPC21-006	Main Post	BE I.A1 BE I.A2	2/3/2022	Existing fence needs security upgrades to meet T-SCIF requirements. Proposed work includes: repair barbed wire on top of fence; install obscuration slating, concertina wire, personnel access gate (south access), and 8'x4'x4" concrete pad
2022-091 Install Gate Access Control Readers, Bldg. 1959	SPC22-001	Main Post	BE I.A2	2/3/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-095 Survey/Design New Dedicated Bus and Emergency Access Lane, Mountainside Elementary School, Bldg. 5506	CIV22-007	Main Post	BE I.A1 BE I.B3	2/10/2022	Survey is needed to design an added/dedicated bus lane and emergency vehicle traffic to the driveway for Mountainside Elementary School.
2022-096 Dig Permit for Command Post Exercise in Rough Rider Field, Fort Carson	4ID22-009	Main Post	BE I.A1	2/9/2022	
2022-097 B&B Barracks Cooktop Renovations, Bldgs. 2070, 2071, 2251, 2452, & 2550	DPW22-009	Main Post	BE I.A2	2/10/2022	
2022-103 Construct Two Additional Rooms in Room 208, Bldg. 7467	SFG22-005	Main Post	BE I.A2	2/15/2022	
2022-104 Construct Two Additional Rooms in Room 128, Bldg. 7403	SFG22-004	Main Post	BE I.A2	2/15/2022	
2022-118 Repair Foundation, Slab, and Walls of Indoor Baffle Range, Bldg. 7431	SFG20-003	Main Post	BE I.A2 BE I.B2	3/7/2022	
2022-119 Construct New Fencing, Bldg. 7473	SFG21-014	Main Post	BE I.A1	3/7/2022	
2022-120 Replace Damaged Turf, Bldg. 7483	SFG21-015	Main Post	BE I.A2	3/7/2022	
2022-121 Construct New Fencing and Install Lockers, Bldg. 7416	SFG21-016	Main Post	BE I.A1 BE I.A2	3/7/2022	Proposed work includes: construction of new 8 ft. tall security fence with a vehicle gate, and 2-man gate; repaint the loft in Bldg. 7416; and install 30-40 new 24" Wx72"Hx24"D lockers for security of commutations equipment and other sensitive items.
2022-123 Prep Walls and Install 4" Resilient Base, Bldg. 7412	SFG20-002	Main Post	BE I.A2	3/7/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-126 Install Trojan Horse Memorial and Concrete Foundation, Fort Carson	SFG22-001	Main Post	BE I.A1	3/14/2022	
2022-127 Demolish Interior Walls, Room 13, Bldg. 9275	4ID22-003	Main Post	BE I.A2	3/14/2022	
2022-128 Demolish Interior Wall Between Rm 103 & 104, Bldg. 9271	4ID22-007	Main Post	BE I.A2	3/14/2022	
2022-129 Add Obstacle to Ivy Mile Obstacle Course, TA Bravo, Fort Carson	4ID22-010	Main Post	BE I.A1	3/17/2022	
2022-132 Construct Fence Around Fuel Tank, Bldg. 1014	DIR21-001	Main Post	BE I.A1	3/17/2022	
2022-133 Repair Pool Glare, Ivy Fitness Center, Fort Carson	MWR21-008	Main Post	BE I.A2	3/17/2022	
2022-135 Replace Carpet in Rooms and Second Floor Hallway, Bldg. 1550	DIR18-013	Main Post	BE I.A2	3/17/2022	
2022-136 Install IDS Tails for PN 77303, COFs, Fort Carson	DPW21-051	Main Post	BE I.A2	3/17/2022	
2022-137 Replace CRAC Units, Bldg. 1551	DIR20-004	Main Post	BE I.A2	3/17/2022	
2022-138 Upgrade Electrical Infrastructure Cyber Lab, Room 121, Bldg. 7450	SFG21-019	Main Post	BE I.A2	3/17/2022	
2022-139 Ivy Week Obstacle Construction, Fort Carson	n/a	Main Post	BE I.A1 BE I.A3 BE I.B1	3/22/2022	
2022-140 Install Chain Link Fence with Gate, Bldg. 1882	2BD21-019	Main Post	BE I.A1	3/21/2022	Proposed work includes: install a permanent three sided 70'x40' chain-link fence with one access gate against the north end of Bldg. 1882.
2022-141 Sandblast and Paint Bunker Doors, Bldgs. 9379, 9381-9393, 9395, 9410-9414, & 9494	CIV20-036	Main Post	BE I.A2	3/21/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-145 Repair Carpet, Bldg. 2160	1BD22-001	Main Post	BE I.A2	3/28/2022	
2022-146 Bldg. 7481 Renovation, Fort Carson	SFG18-006	Main Post	BE I.A2	3/29/2022	Proposed work includes: install new appliances to support the increased capacity of the electrical system; demolish interior wall; install a new wall; move alarm system control panel; move plumbing/electrical lines; install a drain; install hand washing station at front entrance; replace existing refrigeration and freezer space; install push bar on southeast double door to loading dock; and install a hydraulic or electrical lift to assist in unloading operations.
2022-149 Repair Parking Lot, Bldg. 2346	DPW22-018	Main Post	BE I.A2	4/5/2022	
2022-150 Trench/Bore 604' New Coaxial Cable from Existing Pedestal to Special Forces HPTC	MWR22-004	Main Post	BE I.A1 BE I.A2	4/5/2022	



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-151 Remediate Illegal Dumping and Stockpile, Gate 20, Fort Carson	DPW21-022	Main Post	BE I.A2 BE I.B1 BE I.B2 BE I.B3 BE I.C2	4/11/2022	Proposed work includes: remove or flatten/grade up to 4500 cubic yards of fill materials that's been on site for up to 10+ years; test soil prior to removing to clean fill site; shape a ditch for storm water management along the tank trail; seed and water sufficiently to reach 70% cover; add boulders or signage to restrict access; and maintain existing silt fence.
2022-152 Repair Wooden Pedestrian Bridge, Gate 3, Fort Carson	DPW22-029	Main Post	BE I.A2	3/31/2022	Proposed work includes: replace dilapidated wood members; install appropriate fasteners; and apply waterproofing/stain as required to provide a safe and accessible route over the drainage ditch.
2022-153 Install Stop Lights at Wilderness Rd., Fort Carson	BAA21-007	Main Post	BE I.A1 BE I.A2	4/11/2022	
2022-154 Install Hold Position Lights and Sign, BAAF	BAA21-008	Main Post	BE I.A2	4/11/2022	
2022-155 Extend Line Service from Bldg. 1526 to Bldg. 1525	MWR22-003	Main Post	BE I.A1 BE I.A2	4/12/2022	
2022-156 Repair Light, Bldg. 10000	SO1196537	Turkey Creek Ranch	BE I.D1h	4/12/2022	
2022-158 Bldg. 1043 Remodel Design	BAR20-009	Main Post	BE I.A2 BE I.B3	4/12/2022	2022-158 is a document review of the remodel design of a new barrack per design guide.
2022-159 Repair Two Damaged Coax Cables, Kit Carson Drive, Fort Carson	MWR22-005	Main Post	BE I.A2	4/12/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-160 Arbor Day Tree Planting at Patriot Elementary School, Bldg. 6205	DPW22-032	Main Post	BE I.B3	4/12/2022	
2022-161 Construction Project for Cheyenne Mountain Shooting Complex ARMAG, Fort Carson	MWR22-006	Main Post	BE I.A1 BE I.A2	4/12/2022	Proposed work includes: construction of a new concrete pad to house the ARMAG container; install electrical and ICIDS; and install 12 ft fence perimeter around the ARMAG.
2022-163 Renovation/Extension of Access Road for Buses and Emergency Vehicles, Mountainside Elementary School, Bldg. 5506	CIV22-013	Main Post	BE I.A1 BE I.A2 BE I.B2	4/13/2022	
2022-164 Spartan Race June 11-12, Training Area (TA) 2&4, Fort Carson	n/a	Main Post	BE I.A1 BE I.A3 BE I.B1	4/13/2022	
2022-166 Construct and Update Disc Golf Course, Iron Horse Park, Fort Carson	MWR22-010	Main Post	BE I.B1	4/18/2022	
2022-167 Construct Tents for Vacation Bible School Near Fountain on Grounds Southwest of Building 1500, Soldier Memorial Chapel, Dig Permit, Fort Carson	GAR22-007	Main Post	BE I.A1 BE I.B1	4/18/2022	
2022-168 Install Coax Cable to Buildings 5700, 5731, and 5800, Fort Carson	MWR22-011	Main Post	BE I.A1 BE I.A2	4/25/2022	
2022-169 Construct Fence for 4th of July Fireworks Event, Iron Horse Park, Fort Carson	MWR22-012	Main Post	BE I.A1 BE I.B1	4/25/2022	
2022-170 Construct Seven Concrete Pads Adjacent to Buildings 9091 and 9096 (EOD)	TEN22-009	Main Post	BE I.A1 BE I.A2	4/25/2022	
2022-171 Install Projector with Screen and Electric Line, Building 1210	TEN22-012	Main Post	BE I.A2	4/25/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-175 Demolish Two Paint Booths, Bldg. 8000	CIV21-007	Main Post	BE I.A2 BE I.C2	5/3/2022	
2022-177 HVAC Cleaning of Chromium Residue, Bldgs. 9630, 9633, 9668, & 96800	DPW22-031	Main Post	BE I.C2	5/5/2022	
2022-179 Construct Vehicle Tracking Control at Building 7481	SFG22-006	Main Post	BE I.A1 BE I.B2	5/5/2022	
2022-180 Paint Communication Towers, Ft. Carson, PCMS, and Pueblo Chemical Depot	DIR22-002	Main Post  Downrange Fort Carson  Pueblo Depot  PCMS Numbered TAs  PCMS Training Area A	BE I.A2 FC D1a PC B4a2 PC D3a1	5/6/2022	
2022-181 Install Seven New 110 Electrical Outlets in Building 1959	SPC22-003	Main Post	BE I.A2	5/9/2022	
2022-182 Design Review of 95% Civil Plan for Phase I of Arapahoe Village Renovation, Fort Carson	n/a	Main Post	BE I.A1 BE I.A3	5/9/2022	2022-182 is the 95% design review of the renovation of Arapahoe Village.
2022-183 Install Gas Fire Pit on Existing Outdoor Patio, Building 7300	MWR22-014	Main Post	BE I.A1 BE I.A2 BE I.B2	5/9/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-185 Renovate Stack DFAC (B2330) and Warfighter DFAC (B9439) Drive-Thru Signage, Fort Carson	GAR22-008	Main Post	BE I.A1 BE I.A2	5/11/2022	Proposed work includes: replacement of static drive thru signage with digital drive thru ordering point to include two-way microphone and speaker construction outside of Bldgs. 2330 and 9439; provide power to digital menu board and ordering point in drive thru; and replace static menu board with digital displays in carry out area inside of both buildings.
2022-186 Installation of Kiosk Equipment in Wolf DFAC (B1444) and Warfighter DFAC (B9439), Fort Carson	GAR22-009	Main Post	BE I.A2	5/11/2022	
2022-188 Relocate Wall Mounted Television Screen, Rm 107, Bldg. 1853	4SB22-001	Main Post	BE I.A2	5/11/2022	
2022-195 Upgrade Range 2, Cheyenne Mountain Shooting Complex, Fort Carson	MWR20-006	Main Post	BE I.A1 BE I.A2 BE I.B1	5/12/2022	Proposed work includes: construct a 3-ft knee wall at the 25 yard line on range 2; install turning targets; and install electrical and lighting.
2022-196 Complete Memorialization Project, Bldg. 7411	SFG22-008	Main Post	BE I.A2	5/17/2022	
2022-200 Replace Hardstand, Bldg. 1392	DPW22-039	Main Post	BE I.A2 BE I.B2	5/25/2022	
2022-201 Install Directional Sign, Carson Middle School, Bldg. 6200	CIV22-016	Main Post	BE I.A2	5/25/2022	
2022-202 Construct Shade Structure at Weikel Elementary School, Bldg. 6070	CIV22-015	Main Post	BE I.A1 BE I.A2	5/26/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-203 Invasive Species Control 2022-2023, Fort Carson & PCMS	n/a	Main Post  Downrange Fort Carson  PCMS Numbered TAs  PCMS Lettered TAs  PCMS Training Area A	BE I.B3 FC D2b PC B4b2 PC C3b2 PC D3b2	5/31/2022	The project is to eradicate invasive plant species using mechanical, biological, and/or approved chemical treatment on the identified areas at Fort Carson and PCMS.  Information has been provided to the proponent for avoidance of protected cultural resources.
2022-204 Real Property Action for 4.9 Acres along Butts Road, Fort Carson	DPT22-017	Main Post	BE I.A1	5/31/2022	OSSD has requested a permit to use 4.9 acres of land adjacent to Building 9247 on Butts Road, Fort Carson. The property will be used as part of a training complex being planned on adjacent property. Classroom facilities, parking lots and utilities will be constructed on the property to meet OSSDs mission on Fort Carson.

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2022-206 Repair Bldg. 10000 & 10001	SO1196533 SO1196540	Turkey Creek Ranch	BE I.D1f BE I.D1g BE I.D1h BE I.D1j	6/2/2022	<p>Proposed work for work order # SO1196533 includes: installing 2 small broken panes of single pane glass on Bldg. 10000. The panes would be installed using glazier points and window putty then painted to match color of window frame.</p> <p>Proposed work for work order # SO1196540 includes: resetting corner of Bldg. 10001 with mortar and ensuring that the roof is properly sealed. Paint mortar line to match building.</p>
2022-210 Complete Repairs, South Entrance, Bldg. 1225	DPW21-012	Main Post	BE I.A2	6/8/2022	Proposed work includes: replacing existing exterior and interior door with automatic, sliding glass doors; adding housing signage; and installing new windows and awning to entrance exterior.
2022-222 Clean Ditch by Building 344	SO1224039	Main Post	BE I.B2 BE I.B3	6/27/2022	
2022-223 Core Drilling for Soils Analysis - New Abrams School Site	CIV22-023	Main Post	BE I.A1	6/28/2022	
2022-224 Refinish Hardwood Floors, Bldg. 1829, Fort Carson	MWR22-020	Main Post	BE I.A2	6/28/2022	Proposed work includes: sanding and refinishing hardwood floors

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-225 Bldg. 510 Interior Image Renovation, Fort Carson	CIV22-024	Main Post	BE I.A2	6/28/2022	Proposed work includes: interior image update with new finishes, fixtures, etc.; adding two Quick Serve food options; adding new reach-in cooler doors/racks; adding new queuing lines; possible additional diesel fuel dispensers
2022-226 Renovate Burger King Drive-thru, Bldg. 510, Fort Carson	CIV22-025	Main Post	BE I.A1 BE I.A2	6/28/2022	Proposed work includes: renovating the menu board; burying the conduit under the concrete sidewalk and asphalt; saw cutting a trench from the building to the existing menu board approximately 2 feet wide and 12 inches deep; placing conduit with cat 6 lines; afterwards, burying the conduit, tamping the trench, and repouring the flatwork and drive
2022-232 Paint S3 Office, Bldg. 9420, Fort Carson	2BD22-006	Main Post	BE I.A2	7/6/2022	
2022-234 Fill Floor Sump Area, Bldg. 8000, Fort Carson	CIV20-014	Main Post	BE I.A2	7/7/2022	Proposed work includes: filling floor sump area from old parts washers with concrete

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-235 Repair Ceiling, Garcia Gym Bldg. 1856, Fort Carson	MWR22-019	Main Post	BE I.A2	7/12/2022	Proposed work includes: removing existing acoustical tiles, light fixtures, and diffusers in all rooms; painting existing metal ceiling grid; installing new acoustical tiles, light fixtures, and diffusers in all rooms (excludes Fitness Room 103 and Admin Room 1012)
2022-236 Bldg. 1117 Storage Room Renovation, Fort Carson	DPW21-037	Main Post	BE I.A2	7/15/2022	Proposed work includes: removing existing asbestos and lead paint; demolishing existing restrooms; modifying existing fire sprinkler system, MASS notification system, and existing HVAC system to conform to new floor plan; constructing new classroom with new folding partition; suspending acoustical tile ceiling, recessed lights, new voice/data drops and electrical outlets; constructing two new walled storage room; construction new ramp from main hallway to area
2022-237 Repair/Replace Hardstand, Bldg. 1692, Fort Carson	DPW22-054	Main Post	BE I.A2	7/19/2022	Proposed work includes: repairing existing concrete pavement; replacing concrete hardstand and base as needed; addressing drainage structures as required



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-240 Lettering & Plaque Memorialization of Lindsay Hall B7412	SFG22-010	Main Post	BE I.A2	7/21/2022	Proposed work includes: emplacing metal lettering on the western side of the building that reads "Linsday Hall"; anchoring a plaque to the building column memorializing SFC Will Linsday
2022-243 Repair Exterior Stairs at Bldg. 10014, Turkey Creek Ranch	GAR22-012	Turkey Creek Ranch	BE I.D1d	8/3/2022	Proposed work includes: providing in-kind repairs to the stairs adjacent to the Barn (Building 10014) with materials similar to the existing materials and result in an aesthetically similar repair or replacement
2022-244 Construct Concrete Pad for Static Display, Bldg. 2630, Fort Carson	3BD22-002	Main Post	BE I.A1	8/3/2022	Proposed work includes: constructing a 325 square foot gravel display pad; forming the perimeter with railroad ties and anchoring in place with rebar; 1 to 1.5 inches open-graded gravel will be placed over a ground cloth to fill inside the perimeter ties

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-247 Construct Electric Vehicle Charging Stations B1225 and B1445	DPW22-025	Main Post	BE I.A1 BE I.A2	8/3/2022	Proposed work includes: installing five electric vehicle charging stations in two locations; boring power lines under Evans Street and placing it in a trench in the rock band at Building 1225; placing the power in a trench and installing a sidewalk on the north side of the parking lot at Building 1445; decommissioning and removing existing stations
2022-248 Construct Solar Flashing PW00015 On Harr Dr., Fort Carson	DPW22-056	Main Post	BE I.A2	8/3/2022	Proposed work includes: installing solar power School Zone flashing light on existing pole PW00015 on Harr Dr
2022-251 Repair Roof and Siding, Bldg. 3660, Fort Carson	DIR22-005	Main Post	BE I.A2	8/3/2022	Proposed work includes: repairing the leaking roof and trim around windows and doors
2022-253 Install Kennel Sound Baffling, Bldg. 7472, Fort Carson	SFG22-007	Main Post	BE I.A2	8/9/2022	
2022-254 Apply Dust Suppressant, Postwide	DPW22-027	Main Post Downrange Fort Carson	BE I.A2 FC D1b	8/9/2022	
2022-255 Repair Damaged Cable, 7243 Attu Drive, Fort Carson	CIV22-035	Main Post	BE I.A2	8/12/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-256 Repair Damaged Cable, Manila Road, Fort Carson	CIV22-031	Main Post	BE I.A2	8/12/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep
2022-257 Repair Damaged Cable, 7284 Iwo Jima #D, Fort Carson	CIV22-034	Main Post	BE I.A2	8/12/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep
2022-258 Repair Damaged Cable, 7241 Attu Dr # B, Fort Carson	CIV22-033	Main Post	BE I.A2	8/15/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep
2022-259 Repair Damaged Cable, 7100 Biak Dr, Fort Carson	CIV22-030	Main Post	BE I.A2	8/15/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep
2022-260 Repair Damaged Cable, 7013 Hollandia Cir, Fort Carson	CIV22-029	Main Post	BE I.A2	8/15/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep
2022-261 Repair Damaged Cable, 7215 Manila Rd. # B, Fort Carson	CIV22-032	Main Post	BE I.A2	8/15/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep

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2022-262 Bldg. 1012, 3d Floor Renovation (Swing Space), Fort Carson	TEN22-016	Main Post	BE I.A2	8/19/2022	Proposed work includes HVAC, plumbing, and electrical renovation
2022-263 Bldg. 1014 Renovation (SCIF Space), Fort Carson	TEN22-017	Main Post	BE I.A2	8/19/2022	Proposed work includes HVAC, plumbing, and electrical renovation
2022-265 Repair Damaged Cable, 7283 Iwo Jima Rd. # B, Fort Carson	CIV22-036	Main Post	BE I.A2	8/19/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep
2022-266 Verizon New Meter and Transformer Project, Bldg. 1532, Fort Carson	CIV22-039	Main Post	BE I.A1 BE I.A2	8/23/2022	This project was cancelled
2022-267 Charley's Steakey Image Upgrade, Bldg. 6110, Fort Carson	CIV22-040	Main Post	BE I.A1	8/24/2022	Proposed work includes: Replacement of existing vinyl wall covering with new, ceiling finishes, millwork, countertops, and menu board relocation or replacement
2022-268 Construct Evacuation Paths at Mountainside Elementary School, Bldg. 5506, Fort Carson	CIV22-043	Main Post	BE I.A1 BE I.B3	8/24/2022	Proposed work includes: creating emergency evacuation paths for students at Mountainside Elementary school; mowing down three paths and adding 4ft wide road base

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-269 Convert Classroom to Conference Room, Bldg. 7403, Fort Carson	SFG22-011	Main Post	BE I.A1 BE I.A2	8/24/2022	Proposed work includes: removing temporary wall and installing a steel stud and drywall wall permanently with no electrical alterations; removing the door to storage closet within classroom and patching with steel stud and drywall; relocating the doorway to the hallway for outside access
2022-270 Install Two Generators, Bldg. 9636 BAAF, Fort Carson	BAA22-017	Main Post	BE I.A1 BE I.A2	8/29/2022	
2022-271 Room Lock Relocation, Bldg. 842, Fort Carson	4SB22-003	Main Post	BE I.A2	8/29/2022	Proposed work includes removing CDX-10 lock from door of Room 143 to door of Room 128
2022-274 Extend Power to Upgraded Brake Test Equipment, Bldg. 8000, Fort Carson	CIV22-028	Main Post	BE I.A1 BE I.A2	8/31/2022	Proposed work includes extending power line to brake test machine, surface extension only
2022-275 Repair Damaged Cable, 4471 Ray Cir # A, Fort Carson	CIV22-037	Main Post	BE I.A2	9/7/2022	Proposed work includes: replacing bad CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep
2022-276 Install CATV Service Drop, Bldg. 2425 Rm 112, Fort Carson	CIV22-038	Main Post	BE I.A1 BE I.A2	9/7/2022	Proposed work includes: installing CATV service drop by running new cable in new conduit which will require digging about 1 inch diameter and about 18-36 inches deep

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-280 Bldg. 344 Ditch Maintenance	SO67-1164	Main Post	BE I.B1	9/19/2022	Proposed work includes: Proposed work includes: removing debris from downstream flow in ditch line to create proper flow; remove soils and trash in flowline to restore proper flow
2022-281 Perform Storm Sewer System Maintenance, Bldg. 5300 (Fort Carson Middle School)	SO1241155	Main Post	BE I.B1	9/19/2022	Proposed work includes: Proposed work includes: removing debris from downstream flow in ditch line to create proper flow; remove soils and trash in flowline to restore proper flow
2022-283 "I" Ditch Debris Cleanout	SO67-2125	Main Post	BE I.B1	9/19/2022	Proposed work includes: Proposed work includes: removing debris, dead trees, trash and obstruction from downstream flow in ditch line; removing soils trees, and trash in flowline to restore proper flow
2022-285 Roof Repair, Building 1450, Fort Carson	TEN21-010	Main Post	BE I.A2	9/26/2022	Proposed work includes: removal and testing of all materials damaged by water leaks; mitigation of black mold as necessary; replacement of current flat roof with pitched roof to prevent standing water; repair/update current rain gutter system and building trim; clean and repair all damaged cutwork, walls, and framing as necessary

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-286 Upgrade the Integrated Commercial Intrusion Detection System (ICIDS) in Room 150 of Building 1959, Fort Carson	SPC22-009	Main Post	BE I.A2	9/26/2022	Proposed work includes: upgrading and rerouting existing commercial Intrusion Detection System (ICIDS) to 4ID SSO for room 150; removing handles on external door leading to fenced-in backyard
2022-288 Repair Retaining Wall, Building 3496, Fort Carson	DPW22-021	Main Post	BE I.A1 BE I.A3 BE I.B2	9/26/2022	Proposed work includes: demolishing damaged plastic retaining wall, including existing geotextile, aggregate, and drainage pipes; installing precast concrete retaining wall; regrade site to protect existing structures from stormwater flows

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-289 Combine Two Sensitive Compartmented Information Facility (SCIF) Areas within Building 1959, Fort Carson	SPC22-008	Main Post	BE I.A2	9/26/2022	Proposed work includes combining newly constructed SCIF Area Room 178 with existing SCIF Area Room 160 after completion of SCIF Area Room 178, which consists of: adding SCT 50 compliant wall on the south side; SCT 50 compliant walls require covering up windows on the first floor and be deck to deck; HVAC and communication penetrations limited to 90 square inches in size; remove doors and drywall area to SCT 50 standard; reinforcing conference room with sound proof walls and door; installing temporary doors for construction access, requiring dust mitigation; removing West wall going into the SCIF Area Room 160; adding power outlets every 8 feet on areas of new construction; running JWICS fiber lines from the SCIF server room; adding an exit door to the vestibule leading to the stairwell



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-290 Parking and Motorpool Project, Building 9090, Fort Carson	DPW23-006	Main Post	BE I.A1 BE I.A2	9/27/2022	Proposed work includes: repairing by replacement; including subgrade reconditioning or aggregate base course replacement; repairing sidewalk, curb, and gutter as necessary
2022-293 Construct East Ravine Drainage Controls, Butts Army Air Field, Fort Carson	DPW20-013	Main Post	BE I.A1 BE I.B2	9/29/2022	Proposed work includes: constructing two erosion control dams and three drop structures in the channel to collect sediment, reduce flow velocities, and armor the channel to prevent and mitigate erosion
2022-294 Renovate Dog Kennel Obedience Yard, Building 7472, Fort Carson	SFG22-009	Main Post	BE I.A1 BE I.A3 BE I.B2	9/29/2022	Proposed work includes: renovating current outdoor obedience yard to support SOF deployment requirements; levelling the area; covering it in a specialized turf covering; covering the area for year-round use

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2022-296 Jamaican Restaurant Renovation, Building 2355, Fort Carson	CIV21-038	Main Post	BE I.A2	10/3/2022	Proposed work includes: updating lighting to LEDs; adding TV monitors; updating wall configuration; cleaning and flushing plumbing; flushing and cleaning drain area; replacing new pipes for back water from Express Store; replacing kitchen door; replacing 3 compartment sink with new model; epoxying and sealing floor; replacing ceiling tiles; repainting interior walls; replacing walk-in freezer and fridge
2022-297 BAHP ECP (Butts Airfield Security Gate) Pavement Replacement Project, Building 9636, Fort Carson	DPW23-004	Main Post	BE I.A1 BE I.A2 BE I.B2	10/3/2022	Proposed work includes: repairing failed pavement at BAHP ECP Building 9636 to include a revised pavement section comprised of new base course material, concrete pavement, pavement markings, and correction of drainage issues
2022-298 Parking Lot Repair, Building 7500 (Evans Hospital), Fort Carson	DPW23-012	Main Post	BE I.A1 BE I.A2	10/3/2022	Proposed work includes: full depth asphalt replacement, subgrade repair, and concrete curb/gutter/sidewalk

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2022-299 Parking Lot Repair, Building 1666, Fort Carson	DPW23-007	Main Post	BE I.A1 BE I.A2	10/3/2022	Proposed work includes: full depth asphalt replacement, subgrade repair, and concrete curb/gutter/sidewalk
2022-300 Install Sign Posts at Gate 1, Fort Carson	GAR22-017	Main Post	BE I.A1	10/3/2022	Proposed work includes: digging nine 9-12 inch deep holes; placing signs within the holes and filling with concrete
Demolish Rappelling Towers, B2429 B & C, Fort Carson	MWR22-007	Main Post	BE I.A3	4/12/2022	

**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
2022-003 Metal Fencing Repair, Turkey Creek Ranch	GAR21-006	Turkey Creek Ranch	10/6/2021	HC #80763 2/14/2022	<p>No adverse effect to historic properties.</p> <p>Section 106 consultation was completed in December 2021 (Project No. CF2021-007).</p> <p>Responses were also received from Comanche Nation of Oklahoma, Northern Cheyenne Tribe, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effect.</p>
2022-041 Investigate Water Loss at Olympic Shooting Center, Fort Carson	SO1187916	Bird Farm Recreation	11/30/2021		Not initiated at the time of this report.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2022-043 Off-Installation Low Elevation Flight Training, Fort Carson & PCMS	n/a		11/30/2021	HC#080968	<p>Has been initiated but is not completed at the time of this report.</p> <p>Responses were received from the State Historic Preservation Officer, Pike-San Isbell National Forest &amp; Cimarron and Comanche National Grasslands, Edgar Ranches Inc., Huerfano County Commissioners, Las Animas County Commissioners, National Parks Service National Trails Intermountain Region, Not 1 More Acre!, Northern Cheyenne Tribe, Otero County Commissioners, Pawnee Nation of Oklahoma, and the Santa Fe Trail Association. Responses are being prepared at the time of this report.</p>

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2022-068, 2022-069, 2022-070, & 2022-229 Demolish Bldgs. 10018, 10006, Children's Play Structures, and silos, Fort Carson	GAR21-003 GAR21-004 GAR21-019 GAR22-002	Turkey Creek Ranch	12/29/2021	HC #80763 2/14/2022	No adverse effect to historic properties.  Section 106 consultation was completed in December 2021 (Project No. CF2021-007).  Responses were also received from Comanche Nation of Oklahoma, Northern Cheyenne Tribe, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effect.
2022-124 Install Fencing with Gates Along Rail Spur	DIR22-001		3/15/2022	HC #81392 4/27/2022	No adverse effect to historic properties.  Responses were also received from Cheyenne River Sioux River Tribe, Fort Peck Assiniboiné and Sioux Tribes, Northern Arapaho Tribe, Northern Cheyenne Tribe, Pawnee Nation of Oklahoma, Rosebud Sioux Tribe, and Sisseton-Wahepton Oyate; all parties agreed with the finding of effect.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	SHPO Number & Date Concurred	Remarks
2022-282 Complete Electrical Work in Cooler 1 of Bldg. 20000	SPC22-007	Airport Business	9/19/2022	HC#82054 10/11/2022	No Historic Properties Affected.  Section 106 Consultation was completed in October 2022 (Project No. 2022-282)  No other responses were received
2022-245 Demolish Pavilions B10025 and B10026 Turkey Creek Ranch	GAR22-014	Turkey Creek Ranch	8/2/2022	HC#82029 10/11/2022	No historic properties affected.  Section 106 Consultation was completed in October 2022 (Project No. 2022-045)  Responses were also received from Pawnee Nation of Oklahoma, Southern Ute Indian Tribe and the Comanche Nation of Oklahoma; all parties agreed with the finding of effect.
2021-295 Install Two Cafeteria Serving Line Food Warmers and an Ice Machine, Building 7330	CIV21-030	Arrival/Departure Airfield Control Group Rapid Deployment Facility	11/17/2022	HC#80680 11/29/2012	No historic properties affected.  Section 106 Consultation was completed in December 2021 (Project No. 2021-295)  No other responses were received.

**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
2022-025 Fort Carson Family Housing, LLC. Lease Extension	n/a	Main Post	10/28/2021	The lease extension is for an additional 25 years and is administrative only. The construction, renovation, and demolition of housing facilities, which has undergone NEPA review, remains unaffected by the decision to extend the ground lease. The environmental assessments were completed in 1996, 2001, 2006, 2012, and 2021.
2022-029 Renewal of Permit DACA45-3-99-6030 to Envision Inc., Bldg. 735	n/a	Main Post	11/9/2021	
2022-030 Abrams School Lease for New Location, Fort Carson	n/a	Main Post	11/2/2021	
2022-031 Olympic Shooting Range Lease Renewal, Fort Carson	n/a	Bird Farm Recreation Area		
2022-047 Easement Renewal for Drainage Improvement and Hiking Trail Along Fountain Creek for the El Paso County Department of Transportation	n/a	Colorado Springs	12/8/2021	
2022-048 Easement Renewal for Telephone Line Under Fort Carson Railroad Right of Way for Mountain States Telephone Company	n/a		12/8/2021	
2022-050 Lease Renewal for Fort Carson DMV for El Paso County Motor Vehicle Office, Bldg. 1525	n/a	Main Post	12/8/2021	
2022-074 Lease Renewal Security Services Federal Credit Union, Bldg. 1513	n/a	Main Post	1/12/2022	
2022-075 Lease Renewal Thrift Store/Warrior Warehouse, Bldg. 1045	n/a	Main Post	1/12/2022	



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2022-079 Annual Update to 2020-2025 INCRMP	n/a	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	1/12/2022	Document review
2022-085 Renewal of Easement DACA45-2-72-6292 to Colorado Springs Utilities for Gas Line Within the Fort Carson Railroad Right-of-Way in El Paso County, CO	n/a		2/1/2022	
2022-108 Lease Renewal DACA45-1-17-6023 to Armed Forces Bank, Bldg. 1512	n/a	Main Post	2/24/2022	
2022-109 License Renewal DACA45-3-01-6086 City of Colorado Springs for Asphalt Trail Crossing Fort Carson's Las Vegas Rail Spur	n/a		2/24/2022	
2022-111 AT&T License Termination, Fort Carson	n/a	Main Post	2/23/2022	AT&T has requested a termination of the license for a space near Bldg. 846, Specker Avenue & Carey Street.
2022-112 Santa's Workshop Lease Renewal, Fort Carson	n/a	Main Post	2/23/2022	5-year renewal license
2022-113 Termination of Lease, Fort Carson	n/a	Main Post	2/24/2022	T-Mobile requested termination of lease for the cell tower on Specker Ave. & O'Connell Blvd.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2022-125 Renewal Naval Reserve Permit, Bldg. 8932	n/a	Main Post	3/8/2022	Naval Reserve requested a 5-year permit renewal for the use of Bldg. 8932.
2022-144 Clean up Penrose House, Bldg. 10000	GAR22-004	Turkey Creek Ranch	3/28/2022	CRM to escort volunteers to sweep, dust, and mop the building to prepare it for tours as a historical site.
2022-157 Demo Housing Units B5500-5731 Abatement, Demolition, and Replacement of Buildings 5500-5731	DPW22-033	Main Post	4/11/2022	Undertaking was assessed in the 2021 SEA for Family Housing.
2022-165 Lease Renewal for Thrift Shop, Bldg. 1045	n/a	Main Post	4/13/2022	The Spouses Club requested to renew the lease for the Thrift Shop for 5 years.
2022-173 Termination of CenturyLink Easement for Underground Telephone Line (DACA45-2-72-6141), Fort Carson	n/a	Main Post	4/25/2022	Termination of existing easement to homes at Harr Avenue and Stumpf Street in Sioux Village. The equipment will remain in service and the easement is no longer required due to agreements through AAFES.
2022-174 Termination of CenturyLink Easement for Underground Telephone Lines (DACA45-2-72-6023), Fort Carson	n/a	Main Post	4/25/2022	Termination of existing easement to homes at Harr Avenue, Smith Street, and Garcia Street in the Apache Village. The equipment will remain in service and the easement is no longer required due to agreements through AAFES.
2022-178 Demo and Replacement of Cherokee West Village, Fort Carson	BCC22-001	Main Post	4/28/2022	BB Construction will complete the abatement, demolition, and reconstruction of Cherokee Village (Phase I); proposed undertaking is covered under Family Housing SEA that was completed in 2021

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
2022-192 Bound Survey for Belfour Beatty and Abrams New School, Fort Carson	DPW22-036	Main Post	5/5/2022	The Metes and Bound survey (land survey) would be conducted to facilitate the transfer from Belfour Beatty Housing property back to Fort Carson for the school project. There will be no disturbance as result of this survey. The construction of the new school will be covered under an upcoming NEPA review once the designs are submitted.
2022-198 Stationing Action:	SMB22-073	Main Post	5/18/2022	
2022-199 Stationing Action:	SMB22-074	Main Post	5/18/2022	
2022-241 Takeoff minimums for Butts Army Airport	n/a	Main Post	7/21/2022	FIX THIS: Covered under the FAA Order 1050.1F and is categorically excluded. FAA underwent their own NEPA analysis and we are given this for our records
2022-272 Move Power Supplies Bldg. 2039, Fort Carson	DPT21-015	Main Post	8/29/2022	Expedited for asbestos review, did not need to be evaluated for cultural resources but would have been exempt under BE I.A2
2022-301 Space Force in B200000	n/a	Main Post	10/3/2022	Proposed work includes: Space Force entering into a Host Tenant Agreement with Fort Carson for office space and will be utilizing office space on the second floor of B200000, which is a protected historic property but this is an administrative move and will not involve any modifications to the building, and thus there will be no potential to affect historic properties

**Enclosure 3:**  
**Examples of Cultural Resources Awareness Training Materials**



# Cultural Resources Management

WHAT YOU NEED TO KNOW AS AN ENVIRONMENTAL PROTECTION OFFICER

## Course Objectives

You will learn:

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



# Fort Carson Cultural Resources Management Program

## Mission:

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



## Goals:

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

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# Fort Carson Cultural Resources Management Program

## Objectives:

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



Tribal representatives discuss the importance of a rock art panel.

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# What are Cultural Resources?

## Definition:

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

## Or simply:

*The stuff we leave behind*



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

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# Cultural Resources Examples:



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



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## Fort Carson's Cultural Resources

### Fort Carson (as of August 2017):

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



### PCMS (as of August 2017):

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



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

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## Why is it Important to Protect Cultural Resources?

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

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## Another Reason for Protecting Cultural Resources...

# BECAUSE IT'S THE LAW!

National Historic Preservation Act (NHPA)

Archaeological Resources Protection Act (ARPA)

Native American Graves Protection and Repatriation Act (NAGPRA)

American Antiquities Act of 1906

American Indian Religious Freedom Act

Army Regulation 200-1

And more...

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

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## Section 106 of the National Historic Preservation Act (NHPA)

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

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

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

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## Scenario 1: Comanche Nation vs. United States

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

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## Scenario 1: Comanche Nation vs. United States

Comanche Nation asserted Fort Sill:

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

Outcome

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

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## Archaeological Resources Protection Act

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



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## Scenario 2: Graffiti

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



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## How Can You Help Protect and Preserve Cultural Resources?

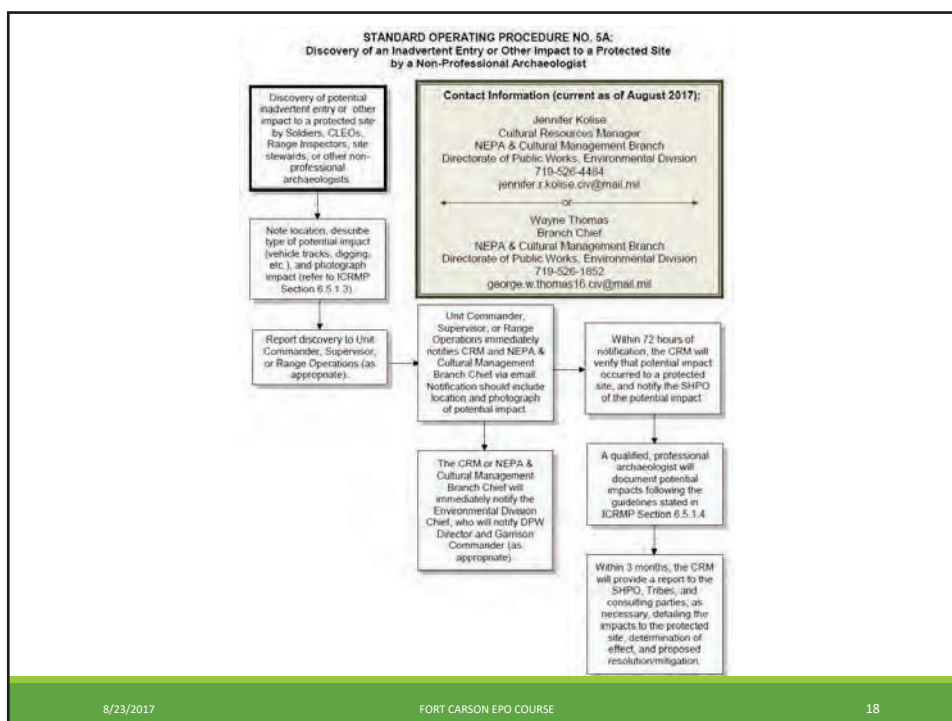
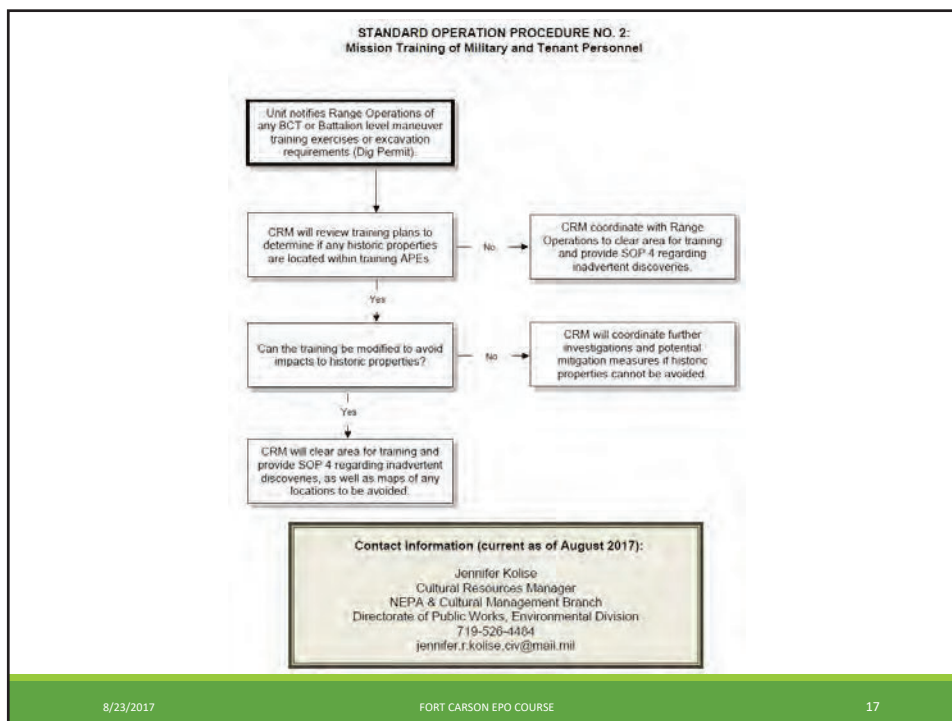
### DO:

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

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## How Can You Help Protect and Preserve Cultural Resources?

### **DON'T:**

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

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

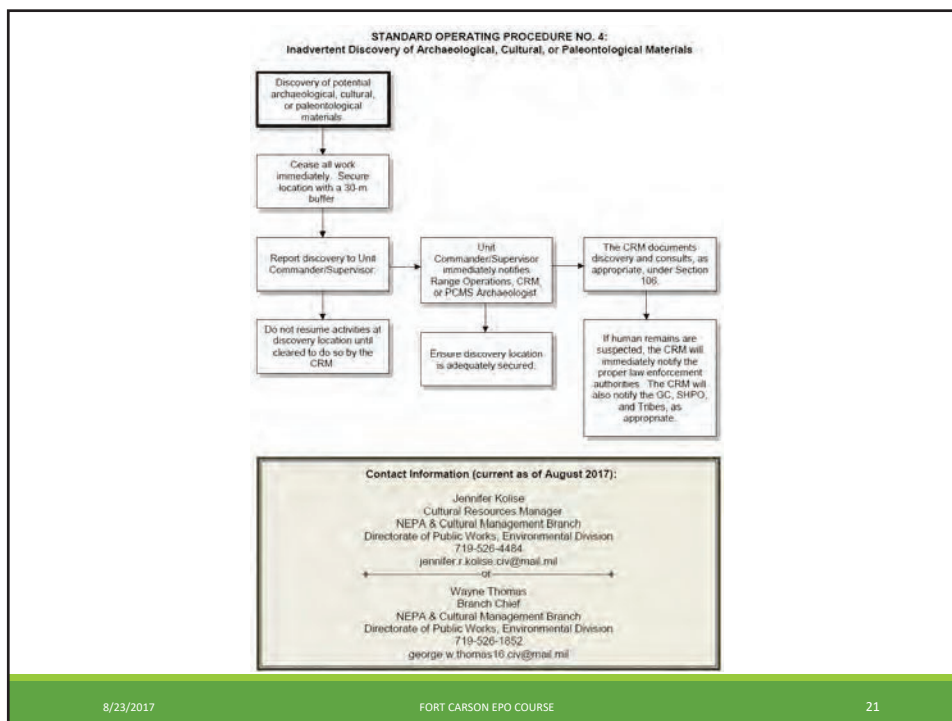
### **STOP WORK IMMEDIATELY**

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

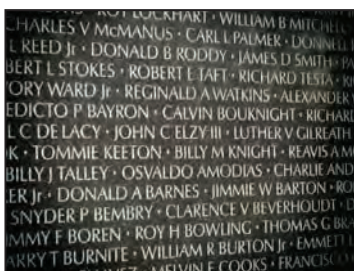
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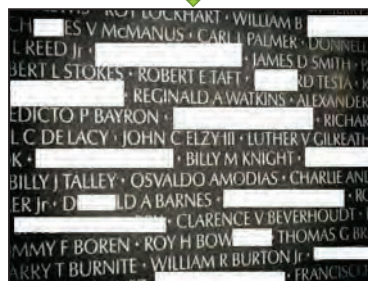


## What is the Harm in Taking a Souvenir?

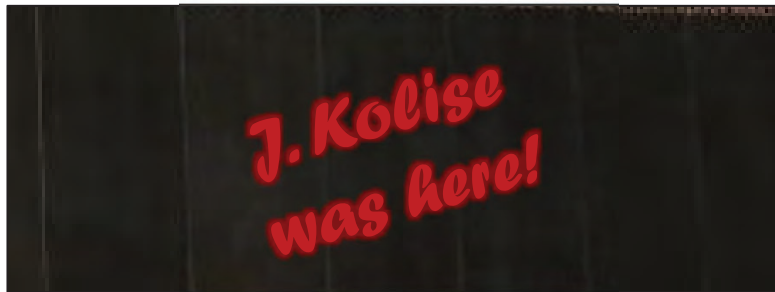


If every person who visited the Vietnam Memorial decided to take one name off as a souvenir, eventually there would be nothing left.

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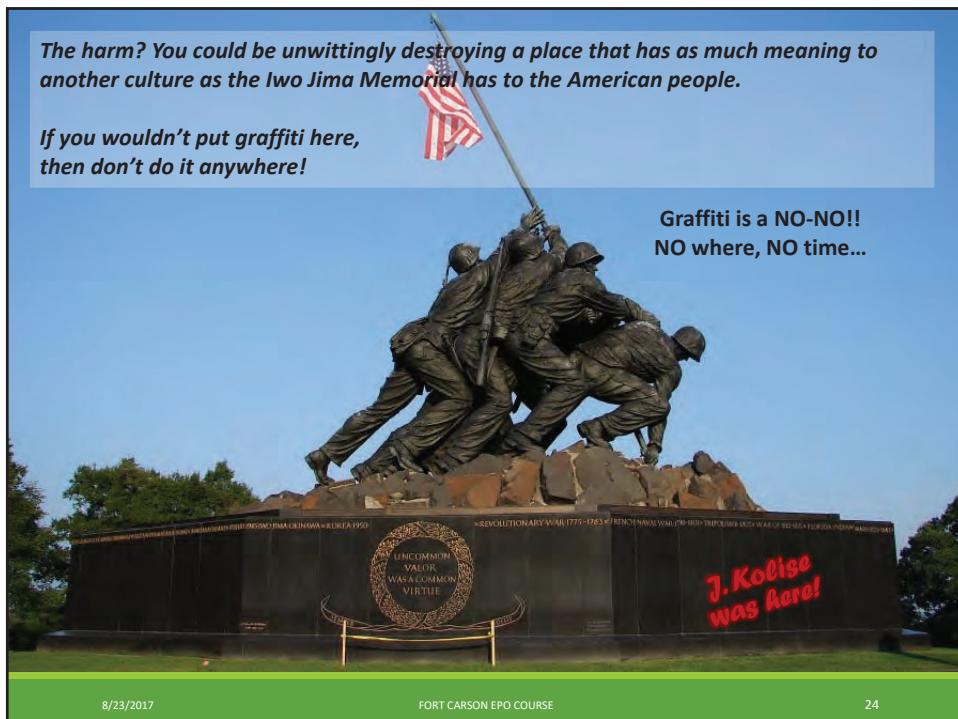
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*The harm? You could be unwittingly destroying a place that has as much meaning to another culture as the Iwo Jima Memorial has to the American people.*

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

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



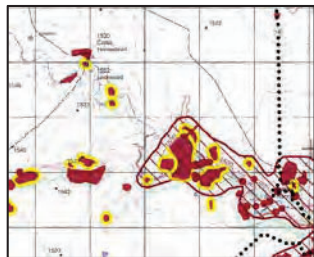
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## Site Protection Measures



**Protected Resources JCR Map**

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

**No digging or mounted maneuvers within protected areas**



**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Seibert Markers and Boulders**

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## Where Can You Learn More?

### **Integrated Cultural Resources Management Plan (ICRMP)**

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

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## Main Points to Remember

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

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

---

A. True

B. False

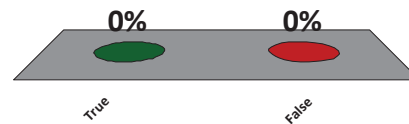
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The Army is legally required to protect and manage cultural resources.

- A. True
- B. False



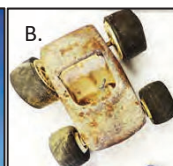
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29

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



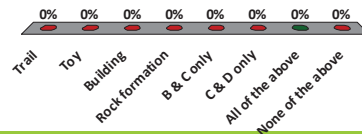
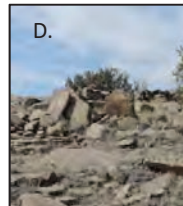
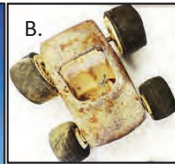
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Which of the following would be considered a cultural resource?

- 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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31

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

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

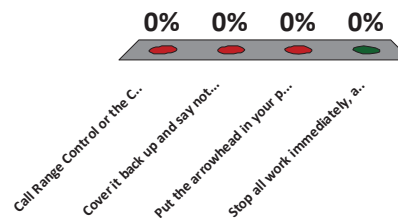
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32

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

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

- A. True
- B. False

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34

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

---

- A. True
- B. False






# CULTURAL RESOURCES

## POTENTIAL HAZARDS AND ENVIRONMENTAL CONCERNS

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

## HANDLING PROCEDURES

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

## GENERAL INFORMATION

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

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

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

**FISCAL YEAR (FY) 2022 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, 2022**

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, 2021, through September 30, 2022, and includes information as outlined in Stipulation V.A. It has been distributed electronically to the SHPO and concurring parties and is available online at: <https://home.army.mil/carson/index.php/Directorate/directorate-public-works/nepa-and-cultural-resources-documents>.

## **I. Exempted Undertakings**

Table 1 of Enclosure 1 lists all exempted undertakings that have been reviewed by the Fort Carson Cultural Resources Manager (CRM) during the reporting period. Forty-four 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). One undertaking required Section 106 consultation during the reporting year (CF2022-005). A second proposed undertaking was cancelled before Section 106 consultation was initiated (2022-279). An unauthorized change in project location was reported to consulting parties on March 21, 2022 (2019-163). The archaeological monitors on site during construction noted no cultural material within the entire project area. The finding of no adverse effects to historic properties remained unchanged.

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

- 2019-134 Restore Natural Watershed in Support of Wildlife Conservation Efforts, Training Area 45, Fort Carson: Section 106 consultation was initiated in August of 2021. Via correspondence dated August 26, 2021 (HC #80254), the SHPO stated the provided site documentation did not provide adequate justification for why the newly



identified features did not contribute to the site's eligibility. USAG Fort Carson is working with the SHPO to schedule a site visit to the APE, as well as updating the site documentation to include a new Management Document Form, which had not been submitted with the previous documentation. Responses were also received from the Comanche Nation of Oklahoma, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma; all agreed with the finding of effect. No further progress has been made on the consultation for this project.

- 2020-249 Construction, Operation, and Maintenance of Three Automated Infantry Squad Battle Courses (AISBCs): Section 106 consultation is required for the proposed AISBC in Training Area 25. This project is set for 2025. Consultation will be initiated once more details on its location, routing of utilities, etc. are known.
- 2021-195 4<sup>th</sup> Infantry Division Explosive Training Exercise, TA 30, Fort Carson. Fort Carson. Section 106 consultation package was sent in July of 2021. The SHPO recommended, in a letter in August 2021, a re-survey of the areas inventoried in the late 1970s to early 1980s by Grand River Consultants, Inc. The Fort Carson CRM program is looking into the development of predictive model to determine the probability of standing architectural resources and/or rock art within the APEs, focusing survey efforts in areas of high probability, in lieu of large-scale survey. This project has been put on hold until this issue can be resolved. Responses were also received from the Comanche Nation of Oklahoma, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed to the finding of effect.

Table 3 of Enclosure 1 lists two other non-exempted undertakings that were reviewed by the Fort Carson CRM. One was a renewal of an existing real property easement and the other was the review of the Integrated Cultural Resources Plan for the annual update.

### **III. Action Updates**

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

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

#### ***B. Cultural Resources Awareness Training***

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

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated September 2020
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources;
- Cultural Resources Awareness Video

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

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

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

- CF2022-006 TA 43 Wildland Fire: The wildland fire started on April 28, 2022, with fire suppression activities concluding on May 1, 2022. The fire burned about 1300 acres within TA 43. Within the fire footprint were seven protected resources: 5PE356, 5PE1388, 5PE8099, 5EP8835, 5PE8836, 5PE8837, 5PE8838. Survey and assessment is on-going.

### *D. Inadvertent Discoveries*

There were no inadvertent discoveries during the reporting period.

### *E. Emergency Response per 36 CFR 800.12*

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

- Incident No. 2021-03366: This wildland fire, which was located in Range 127, started on October 21, 2021, with fire suppression activities ending on the same day.
- Incident No. 2021-03381: This wildland fire, which as located in Range 109, started on October 22, 2021, with suppression activities ending on the same day.
- Incident No. 2021-03405: This wildland fire, which was located in Range 127, started on October 24, 2022, with suppression activities ending on the same day.
- Incident No. 2021-03580: This wildland fire, which was located in the large impact area, was started on November 11, 2021. No suppression activities were taken since the fire was in the large impact area. The fire was reported out the same day.
- Incident No. 2022-00866: This wildland fire, which was located in Range 117 and the large impact area, was started on March 20, 2022, with suppression activities ended on the same day.
- Incident No. 2022-01127: This wildland fire, which was located in TA 17, was started on April 14, 2022, with suppression activities ending on the same day.
- Incident No. 2022-01273: This wildland fire, which was located in TA 43, was started on April 28, 2022. Suppression activities ended on May 1, 2022. See Section III.c for details on impacts to protected resources.

- Incident No. 2022-01276: This wildland fire, which was adjacent to Route 1, was started on April 27, 2022, with suppression activities ending on the same day.

#### *F. Amendment*

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

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

#### *G. Dispute Resolution*

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

#### *H. Other*

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

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John Wachter  
Acting Chief, Environmental Division

**ENCLOSURE 1:**  
**ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY22 REPORTING PERIOD (OCTOBER 1, 2021, THROUGH SEPTEMBER 30, 2022) 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
2022-001 Endurance Training at Townsend Reservoir, Fort Carson	n/a	Townsend Reservoir	FC B	10/12/2021	
2022-008 Alpha Company, 588th Brigade Engineer Battalion (BEB) Excavation Training Request, Training Area (TA) 30, Fort Carson	n/a	Downrange Fort Carson	FC C	10/12/2021	
2022-010 588th BEB, 3rd Armor Brigade Combat Team (ABCT) Excavation Training Request, Range 155, TA 35, Fort Carson	n/a	Downrange Fort Carson	FC C	10/12/2021	
2022-014 Alpha Company, 64th Brigade Support Battalion, Excavation Training Request, TA 16, Fort Carson	n/a	Downrange Fort Carson	FC C	10/14/2021	
2022-016 Alpha Company, 588th BEB, Excavation Training Request, TA 46, Fort Carson	n/a	Downrange Fort Carson	FC C	10/19/2021	
2022-018 615th Engineer Company, 4th Engineer Battalion, Excavation Training Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	10/19/2021	
2022-022 534th Signal Company, 4th Sustainment Brigade, Excavation Training Request, TA 41, Fort Carson	n/a	Downrange Fort Carson	FC C	10/27/2021	
2022-023 Golf Forward Support Company, 4th Battalion, 9th IR, Excavation Training Request, TA 20, Fort Carson	n/a	Downrange Fort Carson	FC C	10/27/2021	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-026 Prairie Dog Control FY22, Fort Carson and PCMS	DPW22-002	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs	BE I.B3 FC D2b PC A3b PC B4b2	11/9/2021 8/31/2022	Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; Wilderness Rd./TA 5; Ranges 11, 24, 29, 45, 57, 104, 109, 117, 119, 121C, 127, 127A, 139, 151, & 155; and Turkey Creek Complex on Fort Carson; the 11A MOUT site (4 Corners); TA10C Pipeline East; MSR1 & County Rd. 76.1; MSR 3 Pipeline South; and DZ Pronghorn at PCMS; and PCMS Airfield.  Section 106 consultation was completed in July 2019 for the Turkey Creek Complex as part of NEPA Project No. 2019-168.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-060, 2022-134, 2022-228 FY22 Quarterly Advisory REC for Training on FC and PCMS	DPT22QRT2, DPT22QRT3 DPT22QTR4	Main Post Downrange Fort Carson  PCMS Numbered TAs  PCMS Lettered TAs  PCMS Training Area A	BE I.C3 FC A FC B FC C PC B1 PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/21/2021 3/21/2022 6/27/2022	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.
2022-061 Range Modification at Range 121	TEN22-005	Downrange Fort Carson	FC D1a	1/3/2022	71st EOD, 242nd EOP requested to modify EOD range to include a vehicle training area. The area will have berms in order to mitigate fragmentation spread and downrange hazards.
2022-071 Bravo Company 52D BEB Excavation Training Request TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	1/4/2022	
2022-077 Alpha Company 52D BEB Excavation Training Request, TA 28, Fort Carson	n/a	Downrange Fort Carson	FC C	1/13/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-083 615th Engineer Company, 4th Engineer Battalion, Excavation Training Request, TA 20, Fort Carson	n/a	Downrange Fort Carson	FC C	1/27/2022	
2022-100 4th ID, Sustainment Brigade, Excavation Training Request, TA 9, Fort Carson	n/a	Downrange Fort Carson	FC C	2/8/2022	
2022-101 Bravo Company, 52D BEB, Excavation Training Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	2/8/2022	
2022-098 Remediate Trail and Install Scour Pool, TAs 12 & 13, Fort Carson	TEN22-007	Downrange Fort Carson	FC D2a	2/10/2022	Proposed work includes: crown and widen the trail to 25'; in-slope a few short sections on the western end of trail; install water bars or rolling dips throughout the trail; install one scour pool; and install rip rap
2022-099 Complete Bank Slope and Check Dam, TA 30, Fort Carson	TEN22-008	Downrange Fort Carson	FC D2a FC D2b	2/10/2022	Proposed work includes: install check dams; bank slope along the trail; and remove 1 acre of trees along the bank sloped reaches.
2022-102 100% Design Review-Electrical Upgrade and Warehouse Construction, Range 117, Fort Carson	DPT22-014	Downrange Fort Carson	FC D1a	2/16/2022	2022-102 is the 100% design review.
2022-105 Repair Red Devil Land Zone and Reconstruct Turnarounds (Airfield), Fort Carson	PCM22-002	Downrange Fort Carson	FC D1b	2/16/2022	
2022-110 Alpha Company, 52D BEB, Excavation Training Request, TA 14, Fort Carson	n/a	Downrange Fort Carson	FC C	3/2/2022	
2022-130 Excavation Training Dig Request, 615th Engineer Construction Company, Training Areas 30 & 31, Fort Carson	n/a	Downrange Fort Carson	FC C	3/14/2022	
2022-131 Excavation Training Dig Request, 404th Aviation Support Battalion, Training Area 9, Fort Carson	n/a	Downrange Fort Carson	FC C	3/16/2022	



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-143 Construct Training Support Storage Facility, Range 150, Fort Carson	DPT20-018	Downrange Fort Carson	FC D1a	3/28/2022	
2022-147 Bravo Battery, 2nd Battalion, 12th Field Artillery, Excavation Training Dig Request, TA 14, Fort Carson	n/a	Downrange Fort Carson	FC C	3/30/2022	
2022-180 Paint Communication Towers, Ft. Carson, PCMS, and Pueblo Chemical Depot	DIR22-002	Main Post Downrange Fort Carson Pueblo Depot PCMS Numbered TAs PCMS Training Area A	BE I.A2 FC D1a PC B4a2 PC D3a1	5/6/2022	
2022-189 994th Engineer Vertical Construction Company, Excavation Training Dig Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	5/9/2022	
2022-190 994th Engineer Vertical Construction Company, Excavation Training Dig Request, TA 11, Fort Carson	n/a	Downrange Fort Carson	FC C	5/9/2022	
2022-191 10th Special Forces Group, Excavation Training Dig Request, TAs 15 & 19, Fort Carson	n/a	Downrange Fort Carson	FC C	5/10/2022	
2022-187 Construct Two Open Air Shoothouses, Range 117, Fort Carson	DPT22-016	Downrange Fort Carson	FC D1a	5/11/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-203 Invasive Species Control 2022-2023, Fort Carson & PCMS	n/a	Main Post  Downrange Fort Carson  PCMS Numbered TAs  PCMS Lettered TAs  PCMS Training Area A	BE I.B3 FC D2b PC B4b2 PC C3b2 PC D3b2	5/31/2022	The project is to eradicate invasive plant species using mechanical, biological, and/or approved chemical treatment on the identified areas at Fort Carson and PCMS.  Information has been provided to the proponent for avoidance of protected cultural resources.
2022-205 Complete Cable Work at Route 6 & Route 11, Fort Carson	MWR22-015	Downrange Fort Carson	FC D1a	5/31/2022	
2022-213 Lands and Rehabilitation and Maintenance Tasks, TAs 27, 30, & 31, Fort Carson	DPT22-006	Downrange Fort Carson	FC D2a FC D2b	6/10/2022	Task 21-156 is to install stream barbs to prevent head cutting in a channel.  Task 21-160 is trail rehabilitation and bank sloping  Task 21-176 is bank sloping and check dam installation  Task 23-191 is trail rehabilitation and stabilization
2022-214 Lands and Rehabilitation and Maintenance Tasks, TAs 21 & 31, Fort Carson	DPT22-008	Downrange Fort Carson	FC D2a	6/10/2022	Task 21-165 is elevated trail rehabilitation  Task 23-103 is elevated trail rehabilitation
2022-216 Lands and Rehabilitation and Maintenance Tasks, TA 21, Fort Carson	DPT22-005	Downrange Fort Carson	FC D2a	6/10/2022	Task 23-101 is for check dam clean out and trail rehabilitation
2022-233 4th Infantry Division, Excavation Training Dig Request, TA 24, Fort Carson	n/a	Downrange Fort Carson	FC C	7/6/2022	

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-239 Alpha Company 52D Brigade Engineer Battalion, Excavation Training Dig Request, TA 10, Fort Carson	n/a	Downrange Fort Carson	FC C	7/18/2022	
2022-242 Chosen Company, 2nd Battalion, 12th Infantry Regiment, Excavation Training Dig Request, TA 55, Fort Carson	n/a	Downrange Fort Carson	FC C	7/26/2022	
2022-250 404th Aviation Support Battalion, 4th Combat Aviation Brigade, Excavation Training Dig Request, TA 14, Fort Carson	n/a	Downrange Fort Carson	FC C	8/3/2022	
2022-254 Apply Dust Suppressant, Postwide	DPW22-027	Main Post Downrange Fort Carson	BE I.A2 FC D1b	8/9/2022	
2022-273 Alpha Company 52D Brigade Engineer Battalion, Excavation Training Dig Request, Training Area 7, Fort Carson	n/a	Downrange Fort Carson	FC C	9/1/2022	
2022-277 569th Engineer Company, 4th Engineer Battalion Excavation Training Dig Request, Training Area 10, Fort Carson	n/a	Downrange Fort Carson	FC C	9/14/2022	
2022-291 4th Attack Battalion, 4th Combat Aviation Brigade, 4 ID, Excavation Training Dig Request, Training Area 49, Fort Carson	n/a	Downrange Fort Carson	FC C	9/27/2022	
2022-295 Bravo Company 299th Brigade Engineer Battalion, Excavation Training Dig Request, Training Area 13, Fort Carson	n/a	Downrange Fort Carson	FC C	9/29/2022 10/4/2022	Two dig request locations were processed due to protected resources located within original APE. Second dig request done in area with no effects to cultural resources

**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
2022-279 Able Company, 4th Battalion, 9th Infantry, Excavation Training Dig Request, Range 60A, Fort Carson	n/a	Downrange Fort Carson	N/A	9/15/2022	Unit cancelled dig request due its location outside exempt areas
CF2022-005 Storm Damage at Turkey Creek Ranch Historic District (5EP836)	n/a	Turkey Creek Ranch Historical District	1/10/2022	n/a	Memorandum for Record was sent on January 10, 2022 regarding the damage and repair efforts to the Penrose House and Cabin at Turkey Creek Ranch Historical District. Repairs were made in-kind. A follow up email was sent on June 29, 2022. No response was received.
2019-163 Convert Range 123 from Single-Phase Power to Three-Phase Power		Downrange Fort Carson	6/3/2020	HC#75708 12/01/2022	March 21, 2022 Fort Carson CRM notified Consulting Parties of an unauthorized change in project location. The power lines were to be installed on the south side of Route 12. The proponent had moved the installation to the north side of the road on about 0.52 miles of the project due to construction issues. The archaeological monitors on site during construction noted no cultural material within the entire project area. The finding of no adverse effects to historic properties remained unchanged.

**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
2022-037 Renewal of Easement DACA45-217-6031 to Black Hills Energy, TA 51	n/a	Downrange Fort Carson	11/18/2021	Document review
2022-079 Annual Update to 2020-2025 INCRMP	n/a	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	1/12/2022	Document review

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

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

Stipulation	Action	Duration	Date Required	Remarks
I.C	Complete documentation on needs data sites or implement a protection measure	3 years after signing	03/30/2017	<p>Completed</p> <p>FY20: Contract awarded in Sep 2019 to draft research designs for the evaluation of 21 sites and the documentation of 11 isolated finds to modern-day standards. Fieldwork has been completed at the 11 isolated finds. CRMs have received final research designs and they are under review. Project is ongoing.</p> <p>The SHPO disagrees with the USAG's determination of eligibility for 28 sites. USAG is drafting a response to address the SHPO's concerns.</p> <p>Protection strategies have been implemented at these sites.</p>
I.C.1	SHPO concurrence with NRHP eligibility determinations from re-evaluations	60 days after submission	TBD	
I.D	Continue consultation with Tribes concerning site protection, monitoring frequencies, and TCPs and sacred sites identification	Ongoing action	n/a	<p>Consultation meeting was held in person, with a virtual option, April 5, 2022 through April 7, 2022. In attendance were representatives from the Cheyenne and Arapaho Tribes of Oklahoma, Cheyenne River Sioux, Comanche Nation of Oklahoma, Jicarilla Apache Nation, Northern Arapaho Tribe, Pawnee Nation of Oklahoma, Rosebud Sioux Tribe, Southern Ute Indian Tribe, and the Standing Rock Sioux Tribe.</p>
III.B	Implement site protection measures	3 years after signing	03/30/2017	<p>77 of 196 protected sites have a protection fence, Seibert markers, or combination; 66 have corner markers only; all others are administratively protected.</p>
III.C	Propose amended site protection measures and monitoring frequencies	As needed	n/a	<p>No proposed changes during reporting period</p>
III.E	Provide training vehicles/aircraft with means of knowing site locations	3 years after signing	03/30/2017	<p>Completed; update as necessary.</p>

Stipulation	Action	Duration	Date Required	Remarks
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections.  Contract awarded in April 2021 to assist with monitoring activities.
VI.A	Implement cultural awareness training of all personnel involved in the execution of undertakings	Annually	n/a	Cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians, and contractors.
VI.B	Offsetting mitigation: Native American Ethnographic Oral History Project	Initiate within 3 years of signing	03/30/2017	Contract was awarded in September 2019 for the completion of traditional use study of the Hogback at Piñon Canyon Maneuver Site.  Site visits took place FY22, and report is forthcoming.
VI.B	Offsetting mitigation: Archaeological Context Project	Initiate within 3 years of signing	03/30/2017	Due to a lack of funding, USAG Fort Carson was not able to award a contract this fiscal year for the Historic Mining Context Study. It will most likely not be awarded until FY23 or FY24.
VI.B	Offsetting mitigation: Santa Fe Trail Community Outreach Project	Initiate within 3 years of signing	03/30/2017	Awaiting formal proposal from Bent's Old Fort Chapter of the Santa Fe Trail Association for the Advisory Committee to review.
VI.B.2	Organize an advisory committee		03/30/2016	Last meeting was held on 11/20/2019.
VII.G	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017.  The ICRMP renewed for FY22 with no changes. Additional updates will be completed as CRM moves through the Army Alternate Procedures process.



**ENCLOSURE 3:**  
**SHPO CORRESPONDENCE ON FY21 ANNUAL REPORT**



# History Colorado

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1626 Evans Street, BLDG 1219  
Fort Carson, CO 80913-4143

Re: Fiscal Year (FY) 2021 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear Mr. Rivero-deAguilar:

Thank you for your correspondence dated and received by our office on November 15, 2020 regarding review of the Fiscal Year 2021 (FY 21) Annual Reports provided to fulfill:

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

For comments to specific portions of the Annual Reports, please see the appropriate attachment [(Attachment 1—Built Environment, Attachment 2—Down Range Fort Carson (DRFC), Attachment 3—Pinon Canyon (PCMS)]. Below, we describe a few general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Similar to our comments on the FY 2018-2020 annual reports, our first general comment concerns the training exercises conducted by USAG Fort Carson. Our previous comments noted that military use of the landscape has the potential to adversely affect historic properties. While we agreed with the minimization efforts implemented, we requested that USAG Fort Carson initiate consultation with our office on mitigating adverse effects. In your 2019-2021 responses to our comments on annual reports, you acknowledged that the trainings were causing adverse effects and that the Programmatic Agreements (PAs) require consultation to resolve those effects according to 36 CFR 800.6. Your responses, however, also noted that USAG Fort Carson only considers adverse effects on a “case-by-case basis” and that you “do not agree to an overarching approach to mitigation.” While your January 2021 letter acknowledged that an overarching approach may be appropriate to resolve adverse effects to historic properties in PCMS, your 2021 letter appeared to discuss primarily “case-by-case” approaches.

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



# History Colorado

a larger scale. While your January 2021 letter agrees that traditional cultural properties (TCP) should be considered on a broader scale, your letter does not address historic properties that do not comprise TCPs.

The relationship between the various resources is important to understanding the area's past and the cultural landscape may comprise an important aspect of a resource's significance. Without the development of an effective resource strategy, important information may be lost due to cumulative effects of these exercises and not all of the adverse effects may be appropriately mitigated. We request that consultations regarding resolution of adverse effects continue and that USAG Fort Carson continues its commitment to resolve adverse effects.

We also continue to argue that while there are many factors that contribute to negative impacts to individual sites, when looking at quantitative information regarding sites entered at Pinon Canyon Maneuver Site (PCMS), the data does not suggest that the current Cultural Awareness Program is effectively reducing the frequency of inadvertent entries. We appreciate the additional information provided on the Program's trainings and are encouraged to hear about potential successes and that the Program staff have had increased integration into military exercises. We, however, note that resources continue to experience inadvertent entries. In some instances, inadvertent entries occur on a regular basis in sites as noted in our 2020 correspondence.

We continue to argue that a quantifiable analysis of the effectiveness of the training would help in determining gaps in the training program. Please see our 2020 letter for additional details. Education specialists have developed tools and analyses to study the effectiveness of educational programs which could be adapted to study the effectiveness of the USAG Fort Carson's Cultural Awareness Program.

While your January 2021 letter notes that cultural resource awareness training is provided to all leaders, the provided documentation does not discuss the type of training provided to different levels of personnel. We continue to note from our FY 20 response that training emphasized for both high and low ranking personnel that incorporates varying methods and formats as well as information oriented to different groups will help ensure the efficacy of the program.

Besides the discussion above, we continue to recommend studying the effectiveness of the minimization and avoidance measures being employed. Using 5PE.2966 as an example, inadvertent entries occurred at the site despite the presence of markers that surround the site. We continue to support the minimization and avoidance measures currently being employed. We, however, recommend studying how these measures fail and determining potential improvements or additional measures to avoid and minimize inadvertent entries.

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

Sincerely,

**Dr. Holly Kathryn Norton**

Digitally signed by Dr. Holly Kathryn

Norton

Date: 2021.12.10 13:17:34 -07'00'

Dawn DiPrince  
State Historic Preservation Officer



# History Colorado

## Attachment 1:

### SHPO Comments on FY 2021 Fort Carson Built Environment PA Annual Report (HC# 58731)

#### **I. Exempted Undertakings**

No comments.

#### **II. Non-Exempted Undertakings**

No comments.

#### **III. Action Updates**

##### **A. Cultural Resources Awareness Training**

No comments.

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

No comments.

##### **C. Exempted Undertakings**

No comments.

##### **D. Expanding the APEs for Exempted Undertakings**

No comments.

##### **E. Inadvertent Discoveries**

No comments.

##### **F. Emergency Response per 36 CFR 800.12**

No comments.

##### **G. Amendment**

No comments.

##### **H. Dispute Resolution**

No comments.



# History Colorado

## Attachment 2:

### SHPO Comments on FY 2021 Down Range Fort Carson PA Annual Report (HC# 63877)

#### I. Exempted Undertakings

No comments.

#### II. Non-Exempted Undertakings

2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System.

2019-134: We appreciate the offer to conduct a site visit for 2019-134 and look forward to meeting with you in the future regarding this undertaking.

2021-195: We look forward to continuing consultation on this undertaking.

2020-249: We look forward to consulting with you regarding 2020-249.

#### III. Action Updates

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

I.C: As noted in our FY 20 response, we appreciate the efforts to evaluate the eligibility of resources determined as “needs data.” We, however, note that additional research is needed for additional archaeological sites. In particular, we note that research is needed for the Turkey Creek Rock Art Historic District.

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

Your letter dated October 2020 responded to our comments that you will collaborate with tribes in the future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommended studying the traditional use of the landscape. We previously agreed with these recommendations in our FY 20 response. We look forward to further consultation regarding the district and any potential traditional cultural properties.



# History Colorado

III.E: We appreciate the information provided with your November 2021 correspondence regarding trainings. We continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. While this reporting year resulted in a decrease in inadvertent entries by training exercises, we note that exercises inadvertently entered resources as recently as the previous year and sometimes result in the entering of the same resource on a regular basis. Understanding and analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries. Further, understanding the reason for this reporting year's decrease in inadvertent entries may help management understand the effectiveness of management practices and provide guidance for approaches to cultural resource management in future years.

VI.A. Please refer to our comments in our letter.

VI.B: We note that in April 2020 we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. We look forward to reviewing the scope of work and the results of this study.

## B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson's November 2021 letter that provided additional information concerning the current training activities. To reiterate, while we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.

Your January 2021 correspondence notes that personnel from all levels receive training. We are encouraged to hear that training is implemented throughout the various levels. All command positions should be aware of and take responsibilities to comply with regulations and laws to protect cultural resources. The documentation, however, does not provide details on whether different trainings are provided for individuals from different levels or positions. Developing training for different levels or positions can help the effectiveness of the program. Further, quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

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

We appreciate USAG Fort Carson's efforts to document inadvertent entries and cumulative effects to historic properties. The provided documentation notes that no inadvertent entries have occurred during the reporting year with the exception of a response to a wildfire. It might be beneficial to understand what led to the decline in inadvertent entries over the 2021 reporting year. Was the decline in inadvertent entries related to increased awareness, planning, and training or was this trend unrelated to any planned measures? We note that as recently as FY 20 exercises continued to inadvertently enter historic properties. We continue to recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

## D. Inadvertent Discoveries

No comments.

## E. Emergency Response

No comments.



# History Colorado

F. Amendment

No comments.

G. Dispute Resolution

No comments.

H. Other

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



**Attachment 3:**  
**SHPO Comments on FY 2021 PCMS PA Annual Report (HC# 65747)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

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

CF2020-008: We look forward to reviewing the results of the fieldwork.

CF2020-014: We look forward to reviewing the results of the fieldwork.

2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System

2021-269: We look forward to consulting on this undertaking.

**III. Action Updates**

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

I.B: As stated in our response to the FY 20 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 and January 2021 correspondences, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

We look forward to reviewing the results of the FY 20 fieldwork. We also look forward to reviewing the results of your Hogback study.

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

III.D: We appreciate the information provided in your January and November 2021 correspondences. We, however, continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on a regular basis. Analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

**B. Cultural Resource Awareness Training**

Please refer to our comments in our letter regarding trainings.

**C. Brigade Training Exercises**





# History Colorado

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

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

We look forward to reviewing the documentation concerning CF2021-008-010. While not identified in the provided documentation, we understand that inadvertent entries occurred in 5LA.7311 and 5LA.7351. We were notified of the inadvertent entries on February 16, 2021 through email. We understand that documentation regarding the inadvertent entries will be submitted to our office for review in the future. We look forward to consulting on these inadvertent entries.

## E. Inadvertent Discoveries

No comments.

## F. Emergency Response

No comments.

## G. Amendment

No comments.

## H. Dispute Resolution

No comments.

## I. Other.

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



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

February 2, 2022

Ms. Dawn DiPrince, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Ms. DiPrince:

Thank you for your correspondence dated December 14, 2021, concerning your review of the fiscal year (FY) 2021 annual reports for the three U.S. Army Garrison (USAG) Fort Carson programmatic agreements. The intention of this letter is to address your comments on mitigation efforts to resolve for adverse effects related to military use of Fort Carson and Piñon Canyon Maneuver Site (PCMS) and our cultural resources awareness training program.

There appears to be confusion concerning USAG Fort Carson's stance on resolving adverse effects to historic properties associated with military training. As our January 2021 letter explained, the *Programmatic Agreement on Military Training and Operational Support Activities at Down Range Fort Carson* (Fort Carson Downrange PA) included an overarching mitigation approach that was agreed upon by your office, the Advisory Council on Historic Preservation (ACHP), and USAG Fort Carson to resolve for potential adverse effects related to military training at 22 resources and unknown historic properties in areas that would not be surveyed. In addition, all signatories acknowledged that inadvertent entries during military training would occur at historic properties; therefore, the Fort Carson Downrange PA stipulated the implementation of a very robust inspection and monitoring program. Since the execution of the Fort Carson Downrange PA in 2014, only eight protected resources at Fort Carson have been entered during military training, with multiple entries occurring only at one resource, 5PE2966, and adverse effects occurring at two resources, 5PE2966 and 5PE8157. Considering the high operational tempo of military training downrange and low number of protected resources entered, one can reasonably conclude that our protection measures and cultural resources awareness training have been quite successful and protective of cultural resources. Considering also, that only two historic properties have been adversely affected as a result of these recent entries, we do not agree *additional* broad scale mitigation is necessary to mitigate potential direct, indirect, and cumulative adverse effects related to military use of Fort Carson. As stated in our October 2020 and January 2021 letters, we will continue to consult on a case-by-case basis when potential adverse effects to historic properties at Fort Carson are identified.

On the other hand, USAG Fort Carson does agree an overarching approach to mitigation is the best course of action to resolve for potential direct, indirect, and cumulative adverse effects resulting from military use of the PCMS. This is the approach we are pursuing as we continue consultation to resolve for adverse effects to historic properties from past brigade exercises.

USAG Fort Carson respectfully disagrees again with your opinion that our current cultural resources awareness training is not effective. As explained in our December 2019 letter, comparing different brigade training exercises to arrive at conclusions on the cultural resource awareness training's effectiveness is a flawed approach and should not be used to judge it. What truly speaks to the success of the cultural resource awareness training is the open communication and cooperative planning lines established with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like the Directorate of Plans, Training, Mobilization, and Security. These entities regularly engage Cultural Resources Program staff in preplanning activities, such as battalion and brigade pre-exercise working group meetings. This collaboration has in our opinion greatly reduced the potential for and actual impacts to protected resources. Cultural Resources Program staff continually work with the 4<sup>th</sup> Infantry Division's geospatial staff to update and ensure protected resources are always included on paper and digital maps used by units during training.

Furthermore, each directorate, brigade, battalion, company, and contractor have designated Environmental Protection Officers (EPOs). An EPO is the point-of-contact for environmental matters and the primary contact for fulfilling the unit's environmental compliance and overall responsibilities. They receive 40 hours of environmental training, become certified and annually update their skills via 8 hour refresher training. EPOs advise the Commander or Director about significant environmental aspects and impacts, and serve as liaisons between the unit and the Environmental Division. A newly designated EPO's training covers cultural resource background, identification and protection requirements, and also includes cultural resources awareness training

Your letter states that our January 2021 letter "does not discuss the type of training provided to different levels of personnel." The Department of Army's Training and Doctrine Command Culture Center is responsible for developing and delivering cultural resources awareness training to all Army leaders, including field grade and general officers. This training is provided at various times in each Soldier's career through formal education and assignment-specific training. The type, length, and depth of training varies depending on the individual's assignment and rank.

There are no foolproof measures that will completely prevent inadvertent entries. USAG Fort Carson uses a combination of protection strategies, such as Seibert markers, maps, training, etc. to decrease the number of inadvertent entries; but protected resources will, from time to time, continue to be entered during military training and other activities, which is why we have an inspection and monitoring

program. USAG Fort Carson is fully dedicated to the protection of its cultural resources and is proud of its efforts and overall protective results.

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

Point of contact for this action are Jennifer Kolise, Cultural Resources Manager, [jennifer.r.kolise.civ@army.mil](mailto:jennifer.r.kolise.civ@army.mil), 719-725-8333.

Sincerely,

RIVERO-  
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Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures

**Enclosure 1:**  
**USAG Fort Carson's Response to SHPO Comments on FY2021 Fort Carson  
Downrange PA Annual Report (HC #63877)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System.*

*2019-134: We appreciate the offer to conduct a site visit for 2019-134 and look forward to meeting with you in the future regarding this undertaking.*

*2021-195: We look forward to continuing consultation on this undertaking.*

*2020-249: We look forward to consulting with regarding 2020-249.*

**USAG Response:** Thank you for your comment.

**III. Action Updates**

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

*I.C: As noted in our FY 20 response, we appreciate the efforts to evaluate the eligibility of resources determined as "needs data." We, however, note that additional research is needed for additional archaeological sites. In particular, we note that research is needed for the Turkey Creek Rock Art Historic District.*

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

*many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district.*

*Your letter dated October 2020 responded to our comments that you will collaborate with tribes in the future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We previously agreed with these recommendations in our FY 20 response. We look forward to further consultation regarding the district and any potential traditional cultural properties.*

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

*III.E: We appreciate the information provided with your November 2021 correspondence regarding trainings. We continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. While this reporting year resulted in a decrease in inadvertent entries by training exercises, we note that exercises inadvertently entered resources as recently as the previous year and sometimes result in the entering of the same resource on a regular basis. Understanding and analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries. Further, understanding the reason for this reporting year's decrease in inadvertent entries may help management understand the effectiveness of management practices and provide guidance for approaches to cultural resource management in future years.*

**USAG Response:** Since the inception of the inspection and monitoring program and the execution of the Fort Carson Downrange PA in 2014, the following provides the number of protected resources entered during military training reported for each fiscal year (FY):

- FY 14 – 0
- FY 15 – 0
- FY 16 – 0
- FY 17 – 0
- FY 18 – 2
- FY 19 – 5, with 5PE2966 entered twice that year
- FY 20 – 1
- FY 21 – 0

The above data show that this year is not an anomaly; there have been multiple years without incident. If anything, we need to ask ourselves why there was an increase in

military training-related entries in FY 19. There has not been a change in the operational tempo at Fort Carson over the last 8 years.

*VI.A: Please refer to our comments in our letter.*

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

*VI.B: We note that in April 2020 we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. We look forward to reviewing the scope of work and the results of this study.*

**USAG Response:** USAG Fort Carson has not been able to award the contract for the Historic Mining Context Study due to lack of funding. The tasks outlined in the draft scope of work that your office reviewed have not changed, but once we have funding available, your office will have an opportunity to review and comment on the final scope of work prior to award.

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

*We appreciate USAG Fort Carson's November 2021 letter that provided additional information concerning the current training activities. To reiterate, while we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.*

*Your January 2021 correspondence notes that personnel from all levels receive training. We are encouraged to hear that training is implemented throughout the various levels. All command positions should be aware of and take responsibilities to comply with regulations and laws to protect cultural resources. The documentation, however, does not provide details on whether different trainings are provided for individuals from different levels or positions. Developing training for different levels or positions can help the effectiveness of the program. Further, quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.*

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

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

*We appreciate USAG Fort Carson's efforts to document inadvertent entries and cumulative effects to historic properties. The provided documentation notes that no inadvertent entries have occurred during the reporting year with the exception of a response to a wildfire. It might be beneficial to understand what led to the decline in inadvertent entries over the 2021 reporting year. Was the decline in inadvertent entries related to increased awareness, planning, and training or was this trend unrelated to any planned measures? We note that as recently as FY 20 exercises continued to inadvertently enter historic properties. We continue to recommend analyzing the*

*effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.*

**USAG Response:** This comment has been addressed above.

D. Inadvertent Discoveries

*No comments.*

E. Emergency Response

*No comments.*

F. Amendment

*No comments.*

G. Dispute Resolution

*No comments.*

H. Other

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

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



**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2021 PCMS PA Annual Report (HC #65747)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*2019-285: We look forward to continuing consultation on this undertaking.*

*CF2020-008: We look forward to reviewing the results of the fieldwork.*

*CF2020-014: We look forward to reviewing the results of the fieldwork.*

*2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System.*

*2021-269: We look forward to consulting on this undertaking.*

**USAG Response:** Thank you for your comment.

**III. Action Updates**

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

*I.B: As stated in our response to the FY 20 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 and January 2021 correspondences, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.*

**USAG Response:** Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles. As noted in your letter, placement of Seibert markers or other physical protection measures do not guarantee entries will not occur. Placement of physical protection measures is expensive and time-consuming. USAG Fort Carson believes our limited resources are better spent on protecting known historic properties or evaluating "needs data" sites.

*We look forward to reviewing the results of the FY 20 fieldwork. We also look forward to reviewing the results of your Hogback study.*

**USAG Response:** Thank you for your comment.

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

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

*III.D: We appreciate the information provided in your January and November 2021 correspondences. We, however, continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on a regular basis. Analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.*

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

**B. Cultural Resource Awareness Training**

*Please refer to our comments in our letter regarding trainings.*

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

**C. Brigade Training Exercises**

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

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

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

*We look forward to reviewing the documentation concerning CF2021-008-010. While not identified in the provided documentation, we understand that inadvertent entries occurred in 5LA.7311 and 5LA.7351. We were notified of the inadvertent entries on February 16, 2021 through email. We understand that documentation regarding the inadvertent entries will be submitted to our office for review in the future. We look forward to consulting on these inadvertent entries.*

**USAG Response:** Thank you for your comment. As a status update, all known protected resources within the Bent Canyon Wildland Fire footprint have been inspected, and site documentation has been updated. Once the site documentation has been reviewed, it will be forwarded to your office. Approximately 287 acres have been surveyed and 29 newly identified sites recorded. A technical report of investigations and

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

Not mentioning the inadvertent entries that occurred at 5LA7311 and 5LA7351 in the annual report was an oversight. These entries occurred during the site marking effort. Once the PCMS Archaeologists have finished documenting the entries, an after action report and updated site documentation will be submitted.

E. Inadvertent Discoveries

*No comments.*

F. Emergency Response

*No comments.*

G. Amendment

*No comments.*

H. Dispute Resolution

*No comments.*

I. Other

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

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

**Enclosure 4:**  
**Examples of Cultural Resources Awareness Training Materials**



# Cultural Resources Management

WHAT YOU NEED TO KNOW AS AN ENVIRONMENTAL PROTECTION OFFICER

## Course Objectives

You will learn:

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



# Fort Carson Cultural Resources Management Program

## Mission:

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



## Goals:

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

8/23/2017

FORT CARSON EPO COURSE

3

# Fort Carson Cultural Resources Management Program

## Objectives:

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



Tribal representatives discuss the importance of a rock art panel.

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# What are Cultural Resources?

## Definition:

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

## Or simply:

*The stuff we leave behind*



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

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# Cultural Resources Examples:



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



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## Fort Carson's Cultural Resources

### Fort Carson (as of August 2017):

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



### PCMS (as of August 2017):

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



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

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## Why is it Important to Protect Cultural Resources?

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

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## Another Reason for Protecting Cultural Resources...

### BECAUSE IT'S THE LAW!

National Historic Preservation Act (NHPA)

Archaeological Resources Protection Act (ARPA)

Native American Graves Protection and Repatriation Act (NAGPRA)

American Antiquities Act of 1906

American Indian Religious Freedom Act

Army Regulation 200-1

And more...

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

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## Section 106 of the National Historic Preservation Act (NHPA)

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

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

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

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## Scenario 1: Comanche Nation vs. United States

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

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## Scenario 1: Comanche Nation vs. United States

Comanche Nation asserted Fort Sill:

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

Outcome

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

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## Archaeological Resources Protection Act

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



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## Scenario 2: Graffiti

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



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## How Can You Help Protect and Preserve Cultural Resources?

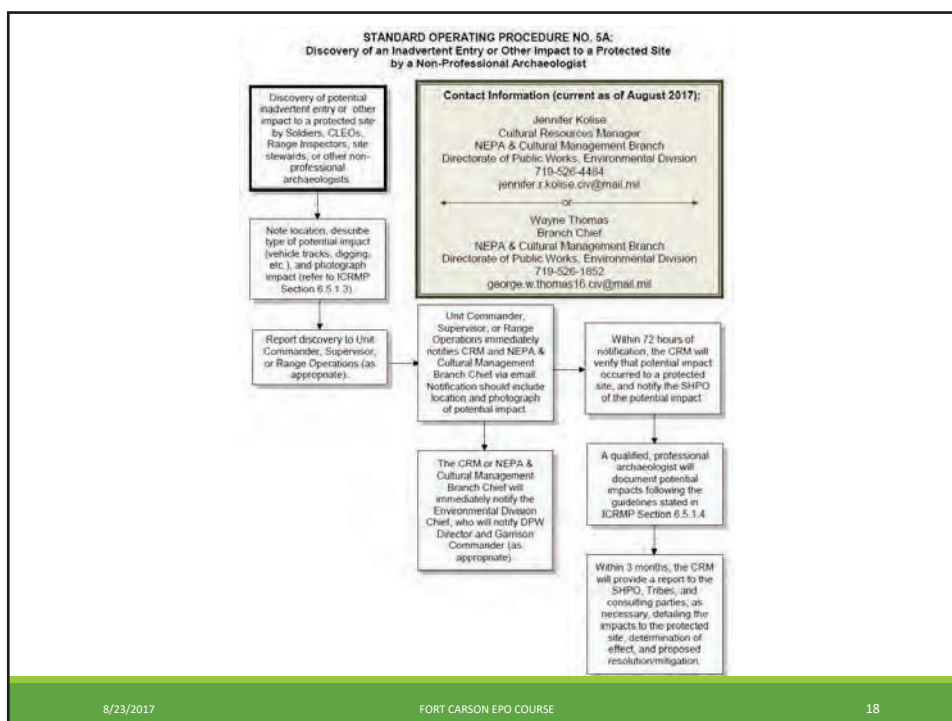
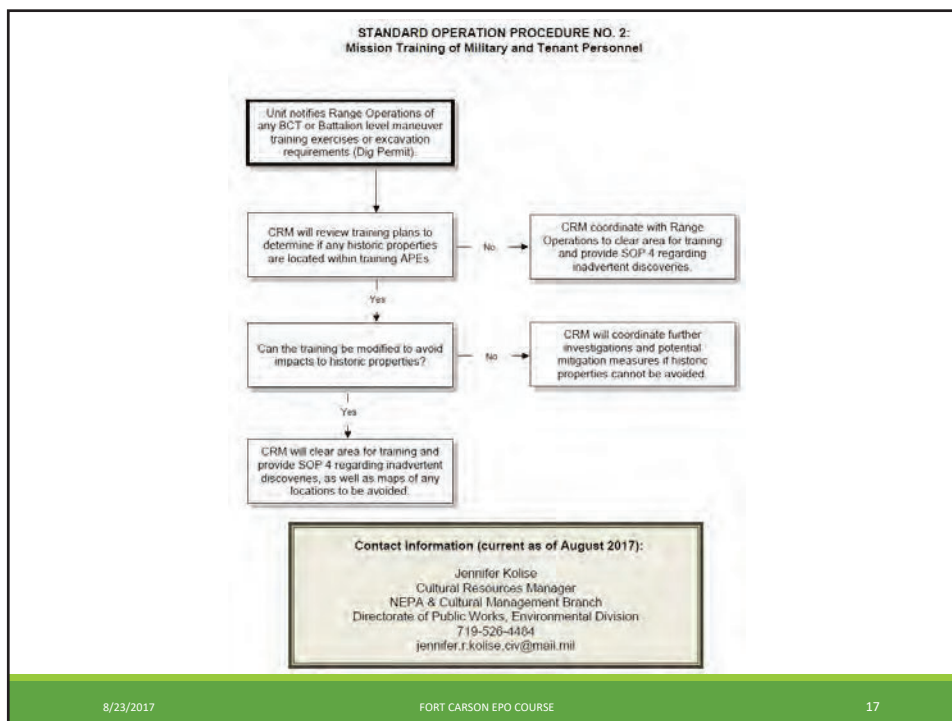
### DO:

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

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## How Can You Help Protect and Preserve Cultural Resources?

### **DON'T:**

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

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

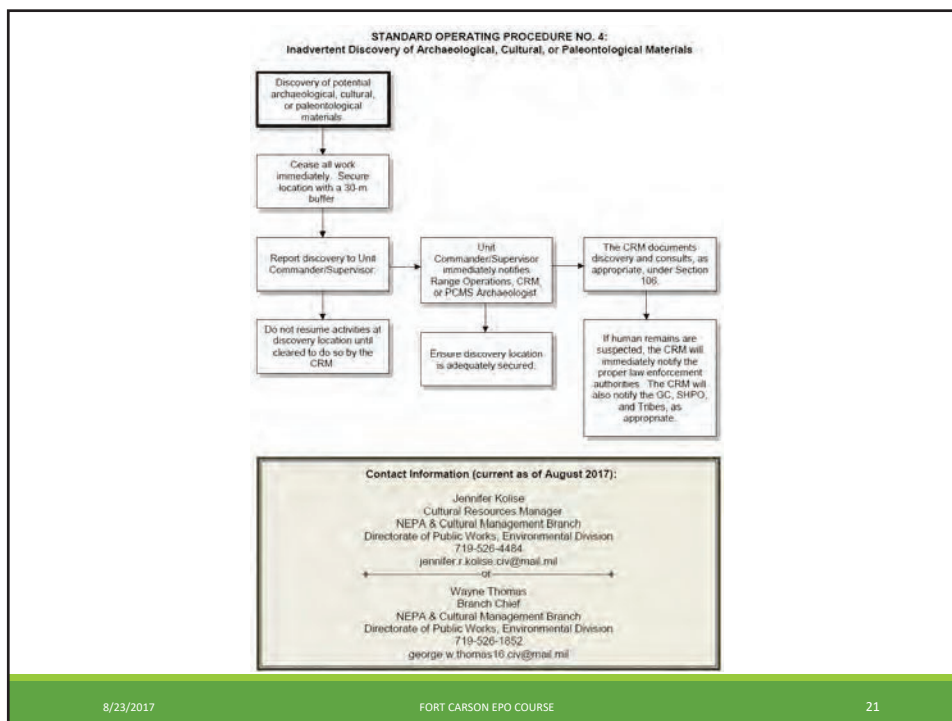
### **STOP WORK IMMEDIATELY**

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

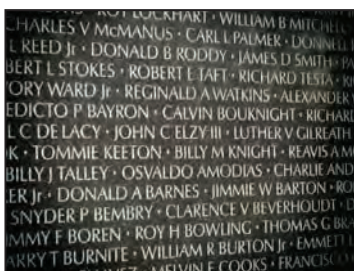
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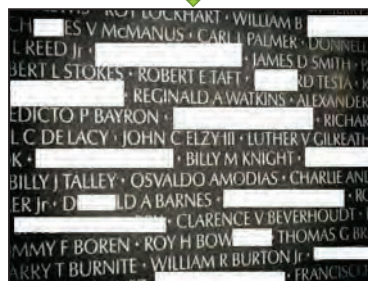


## What is the Harm in Taking a Souvenir?

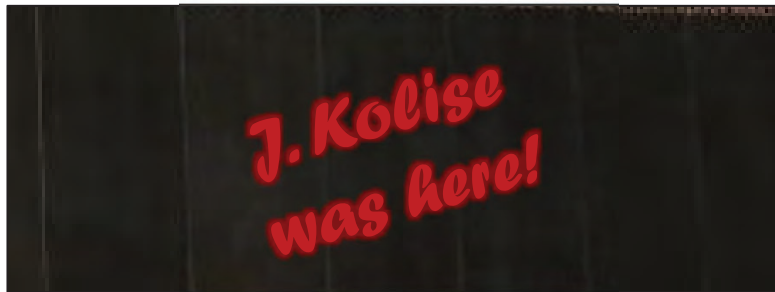


If every person who visited the Vietnam Memorial decided to take one name off as a souvenir, eventually there would be nothing left.

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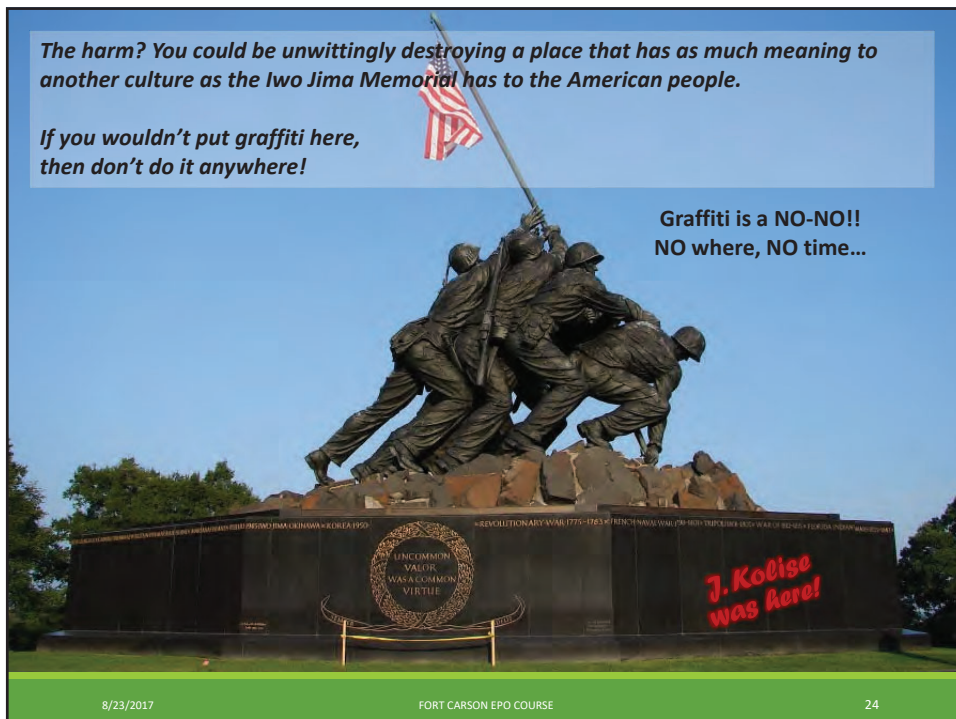
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*The harm? You could be unwittingly destroying a place that has as much meaning to another culture as the Iwo Jima Memorial has to the American people.*

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

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



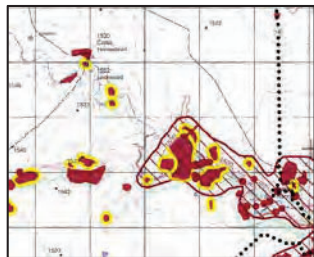
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## Site Protection Measures



**Protected Resources JCR Map**

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

**No digging or mounted maneuvers within protected areas**



**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Seibert Markers and Boulders**

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## Where Can You Learn More?

### **Integrated Cultural Resources Management Plan (ICRMP)**

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

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## Main Points to Remember

---

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

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

---

A. True

B. False

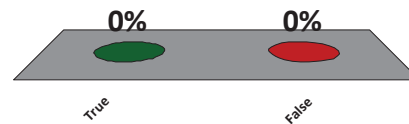
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28

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

- A. True
- B. False



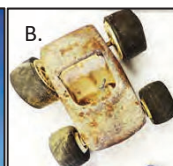
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29

Which of the following would be considered a cultural resource?

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



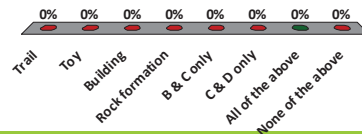
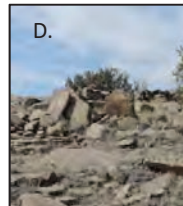
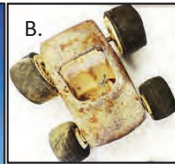
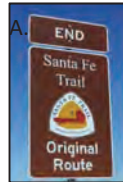
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30

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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31

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

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

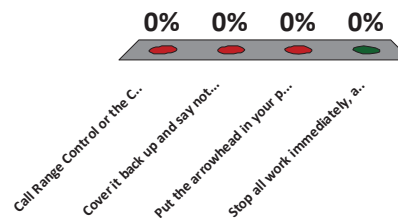
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32

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

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33

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

- A. True
- B. False

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34

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

---

- A. True
- B. False



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# CULTURAL RESOURCES

## POTENTIAL HAZARDS AND ENVIRONMENTAL CONCERNS

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

## HANDLING PROCEDURES

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

## GENERAL INFORMATION

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

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

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

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

1/11/2021

# IRON STRIKE OC TEAM BRIEF

## ENVIRONMENTAL CONSIDERATIONS

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## TOPICS

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

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## WHAT IS A PROTECTED RESOURCE?

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

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## CULTURAL RESOURCE EXAMPLES



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

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## NATURAL RESOURCE EXAMPLES

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



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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## CRITICAL INFRASTRUCTURE EXAMPLES

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



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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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



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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## COMPLIANCE REQUIREMENTS FOR PROTECTED RESOURCES

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

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

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## PROTECTED RESOURCES MAP SYMBOLS: UNMARKED PROTECTED RESOURCE



**Symbol:** Area polygon with red-filled interior

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

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

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)

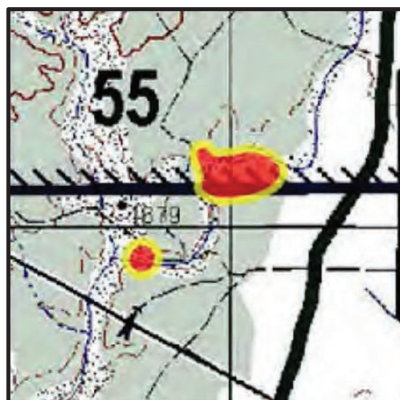


## PROTECTED RESOURCES MAP SYMBOLS: MARKED PROTECTED RESOURCE

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

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

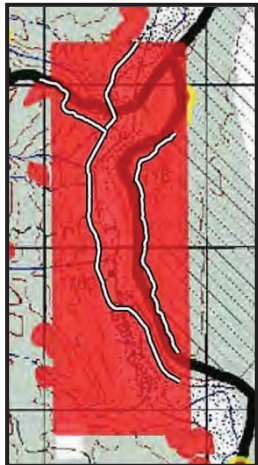
**Caveats:** Ensure the yellow outside perimeter is avoided at all times by vehicles. **Do not simply rely on the observed Seibert markers and/or fencing.**



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## PROTECTED RESOURCES MAP SYMBOLS: AUTHORIZED TRAVEL CORRIDOR



**Symbol:** White line interior and black outline

**Definition:** Corridors approved for travel through protected resources

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

Jen Kolise, Cultural Resources Manager – 719-526-4484 – [jennifer.r.kolise.civ@mail.mil](mailto:jennifer.r.kolise.civ@mail.mil)  
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## PHYSICAL PROTECTION MEASURES



**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Boulders**

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## INADVERTENT ENTRY / IMPACT

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

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## NATURAL RESOURCES GUIDANCE

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

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

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)





## NATURAL RESOURCES GUIDANCE

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

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## NATURAL RESOURCES GUIDANCE

- Do not crush or cut trees unnecessarily.



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



Stock tanks provide drinking water for wildlife.

- Do not run over stock tanks or guzzlers.

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## CULTURAL RESOURCES GUIDANCE

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

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

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## CULTURAL RESOURCES GUIDANCE

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



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

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

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

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## SPILL RESPONSE

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

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

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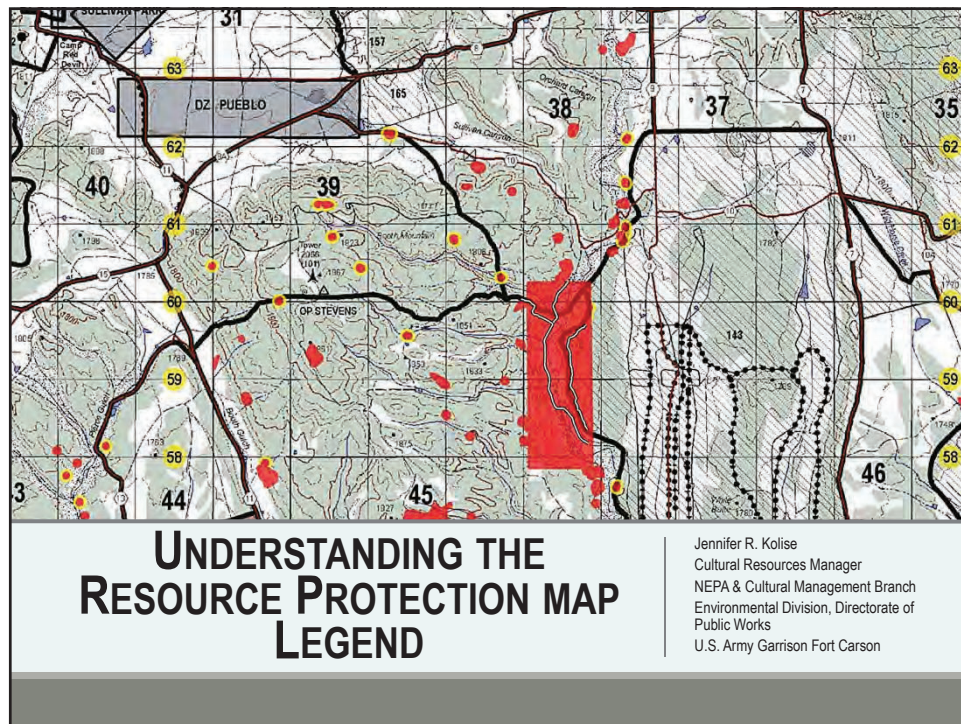


## IRON STRIKE DIG REQUEST PROCESS

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

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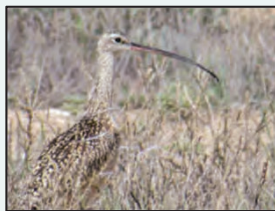


## WHAT IS A PROTECTED RESOURCE?

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

## NATURAL RESOURCE EXAMPLES

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



## CULTURAL RESOURCE EXAMPLES



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

## CRITICAL INFRASTRUCTURE EXAMPLES

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



## HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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



## COMPLIANCE REQUIREMENTS

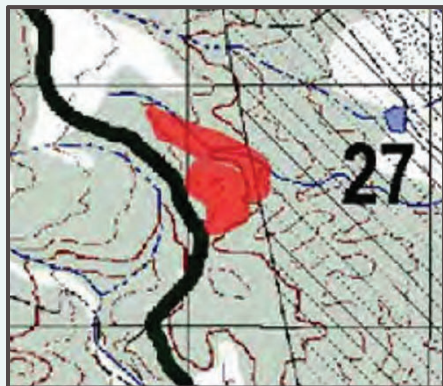
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- No vehicles allowed
- No excavation allowed
- No bivouacking allowed
- No aerial maneuvering allowed within 100 meters
- Travel allowed only on approved travel corridors through the area as shown on the map

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

## STANDARDIZED SYMBOL: UNMARKED RESOURCE

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**Symbol:** Area polygon with red-filled interior

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

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

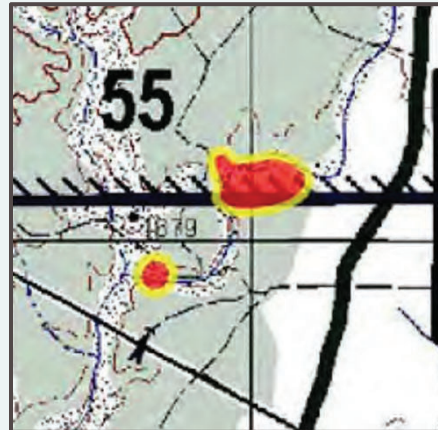


## STANDARDIZED SYMBOL: MARKED RESOURCE

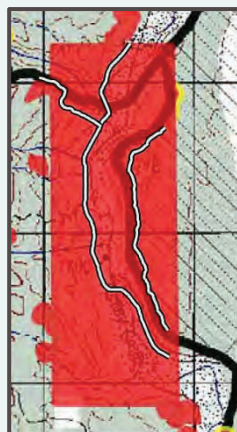
**Symbol:** Area polygon with red-filled interior and yellow outline (halo)

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

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



## STANDARDIZED SYMBOL: AUTHORIZED TRAVEL CORRIDOR THROUGH PROTECTED RESOURCE



**Symbol:** White line interior and black outline

**Definition:** Corridors approved for travel through protected resources

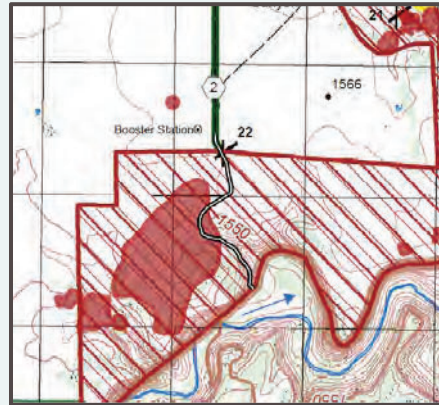
**Caveat:** No off-road travel allowed within protected resource. **Stay on the approved existing corridor only.**

## STANDARDIZED SYMBOL: DISMOUNTED ONLY AREAS

**Symbol:** Area polygon with red crosshatch

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

**Caveat:** These areas do not conform to topography.



## PHYSICAL PROTECTION MEASURES



**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Boulders**



**FISCAL YEAR (FY) 2022 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, 2022**

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, 2021, through September 30, 2022, and includes information as outlined in Stipulation VI.A. It has been distributed electronically to the SHPO and concurring parties and is available online at: <https://home.army.mil/carson/index.php/Directorate/directorate-public-works/nepa-and-cultural-resources-documents>.

## **I. Exempted Undertakings**

Table 1 of Enclosure 1 lists all exempted undertakings that have been reviewed by the Fort Carson Cultural Resources Manager (CRM) during the reporting year. Eleven undertakings were reviewed that were considered exempted in accordance with Appendix 1 of the PCMS PA.

## **II. Non-Exempted Undertakings**

Table 2 of Enclosure 1 lists all undertakings that required consultation in accordance with Section 106 of the National Historic Preservation Act (NHPA). Three new undertakings required Section 106 consultation (2022-043, 2022-082, and CF2021-010). The Section 106 for the proposed tamarisk control project (2021-269), reported in the FY21 annual report, has yet to be initiated. Survey of the APE is complete and the report is being prepared for 2021-269.

The following is an update to the status of Section 106 consultation continuing from the fiscal year 2021 reporting period:

- 2019-285 Install Cellular Tower, PCMS: Section 106 consultation was initiated on March 30, 2021. Via correspondence dated April 23, 2021 (HC #79539), the SHPO requested additional information about the construction of utility lines beyond the proposed tower's location, as well as requested a more quantifiable analysis of historic properties within the visual APE. Responses were also received from Crow Creek Sioux Tribe, Pawnee Nation of Oklahoma, Not 1 More Acre!, and Otero County Board of County Commissioners (BOCC). Crow Creek Sioux Tribe stated via

correspondence dated March 31, 2021, that PCMS is outside of their area of interest. They only have an interest in northern Colorado. The Pawnee Nation of Oklahoma agreed with the finding of effects. Not 1 More Acre! and the Otero County BOCC did not agree with the finding of effects. Follow-up consultation to address their concerns was conducted.

A supplemental undertaking review packet was submitted to the SHPO, Tribes, and other consulting parties and interested parties on June 23, 2021. This update includes the APE for the utility line corridor, as well as the following: a description of what the Army & Air Force Exchange Service is and how it fits within the Army organization; a map of locations of other cellular towers along U.S. Highway 350 near PCMS; representative photographs of cellular towers of similar height and construction style along U.S. Highway 350 with photograph location map; significance criterion that qualifies a cultural resource for inclusion on the National Register of Historic Places; more detailed analysis of the visual effects to historic properties; and overview photographs from key locations with photograph location map. In correspondence dated July 22, 2021 (HC #79539), the SHPO noted that previously undocumented segments of 5LA5795 (Santa Fe Trail), 5LA8548 (Atchison, Topeka, and Santa Fe [ATSF] Railroad), and 5LA13462 (U.S. Highway 350) are within 0.25 miles of the proposed tower location. In addition, the SHPO had concerns with potential adverse visual effects to 5LA4434 and 5LA5795. USAG Fort Carson is documenting and evaluating the unrecorded segments of 5LA8548 (ATSF Railroad) and 5LA13462 (U.S. Highway 350) as well as the Santa Fe Trail (5LA5795). Once the recording is completed, USAG Fort Carson will submit a response to the SHPO. Responses were also received from the Northern Cheyenne Tribe, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all agreed to the finding of effects. Section 106 consultation is ongoing.

- CF2020-008 Bent Canyon Wildland Fire After Action Inspection: Survey fieldwork is continued from FY21 and is ongoing. Once the survey is complete, technical report and all supporting documentation will be submitted to the SHPO, Native American Tribes, and other consulting and interested parties.

Table 3 of Enclosure 1 lists all other non-exempted undertakings that were reviewed by the Fort Carson CRM. The first is the annual review of the Integrated Cultural Resources Plan and the second was U.S. Air Force Academy Survival Training from May to July 2022. The survival training was a dismounted training involving navigation, food preparation, and shelter building. The third non-exempt undertaking reviewed by the CRM was a proposal for oil and gas lease sales on BLM lands adjacent to PCMS.

### **III. Action Updates**

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

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

#### *B. Cultural Resources Awareness Training*

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

- Environmental Protection Officer (EPO) course – provided monthly to Soldiers who serve as the EPO for their unit; updated September 2020
- Fort Carson Environmental Battle Book, 2018, v6.1 – a quick reference document for guidance on common environmental concerns including cultural resources; Cultural Resources Awareness Video
- Cultural Resources Awareness Presentation for the U.S. Air Force Academy Survival Training. This presentation was shared with more than 600 Cadets and Commanding Officers prior to their training at PCMS.

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

#### *C. Brigade Training Exercises*

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

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

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

- CF2021-008 Storm Damage at Red Rocks Ranch: A hail-producing thunderstorm, which occurred at some point during June 11-13, 2021, caused damage to the Red Rocks Ranch (5LA5816). This damage was noted by the Operations & Management staff on June 15, 2021. The SHPO was notified via email on June 17, 2021. Damage to this historic property includes broken windows, dented metal roofing and gutter system, and damaged exterior plaster at the Main Residence (Feature 1); dented metal roofing on the shed (Feature 2), bunkhouse (Feature 6), barn/shed (Feature 7), and barn (Feature 8); dented metal roofing and gutter system of the bunkhouse (Feature 5); dented metal roof; collapsed bench and broken exterior light near the garage (Feature 4); and development of erosional rills. The MFR and supporting documentation are forthcoming.
- CF2021-009 Van Bremer Flood Assessment: In June of 2021, a major flood event occurred along the Van Bremer Arroyo, which runs east-west along the southern

portion of PCMS. Upon preliminary inspection, the flood resulted in downed Seibert markers at several sites, as well as damage to other sites. Therefore, a full assessment of all protected resources along the Van Bremer Arroyo is being conducted. The SHPO was notified via email on June 22, 2021. The MFR and site documentation is forthcoming.

- CF2021-010 Removal of Downed Tree at Sharp's Ranch: On July 27, 2021, the Cultural Resources Manager and PCMS Archaeologist were notified by the PCMS Facility Manager of a downed tree at Sharp's Ranch. The tree did not fall on any of the main features of the ranch. Documentation and Section 106 consultation for the removal of the tree is forthcoming.
- CF2022-003 Storm Damage at Cross Ranch: Damage due to a storm event to Cross Ranch, which is eligible for the National Register of Historic Places, was report on November 16, 2021 to Colorado State Historic Preservation Officer (SHPO) in accordance with Stipulation IV.C 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*, executed on April 23, 2014, and amended on April 24, 2018. Inadvertent Discoveries. The damage assessment was completed on February 8, 2022. The results of the assessment were reported on August 25, 2022. Consultation on the mitigation for the damage is on-going as of the date of this report.
- CF2022-007 Black Hills Wildland Fire: The wildland fire started on June 17, 2022, with fire suppression activities concluding on June 28, 2022. The fire burned about 1650 acres within TA 11, TA G, and TA H. Within the fire footprint were fifteen protected resources: 5LA04399, 5LA06571, 5LA06581, 5LA06583, 5LA06609, 5LA06610, 5LA06611, 5LA06624, 5LA06626, 5LA06627, 5LA07438, 5LA07509, 5LA07421, 5LA07421, and 5LA07471. Survey and assessments are on-going.

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.

- Black Hills Wildfire: The wildland fire was started on June 17, 2022 and burnt about 1650 acres in TA 11 and TA H before the suppression activities were completed on June 28, 2022. See Section III (d) for details.

#### *F. Amendment*

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

On September 28, 2021, USAG Fort Carson notified the ACHP, SHPO, Tribes, and other consulting and interested parties of our intention to implement the Army Alternate Procedures (AAP) and requested point-of-contact information for those interested in collaborating with USAG Fort Carson in the development of a Historic Properties Component. Implementation of the AAP would supersede the PCMS PA. These efforts have been stalled by staff shortages, but USAG Fort Carson will continue this effort in the future.

#### *G. Dispute Resolution*

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

#### *H. Other*

Section 106 consultation on the 2010 2-4 Brigade Combat Team (BCT) “Warhorse Rampage” Training Exercise, the 2013 2-4 BCT “Warhorse Charge” Training Exercise, the 2015 1SBCT “Raider Focus I” Training Exercise, 2017 1SBCT “Raider Focus II” Training Exercise, and 2018 3<sup>rd</sup> Armored Brigade Combat Team (3ABCT) “Iron Strike” Training Exercise is ongoing. Mitigation plans have been developed and are under review for 36 historic properties that have been adversely affected by these training exercises or that have had multiple entries since 2010 from military training. There has been no correspondence during the reporting period concerning these consultation efforts.

Report compiled by:

Angie Bell  
Chief, NEPA & Cultural Resources Branch

Approved by:

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N.P.1028492835

Digitally signed by WACHTER.JOHN.P.1028492835  
DN: cn=U.S. Government, ou=DoD, ou=PKI,  
ou=USA, cn=WACHTER.JOHN.P.1028492835  
Date: 2022.11.16 10:33:23 -0700

John Wachter  
Chief, Environmental Division

**ENCLOSURE 1:**  
**ALL UNDERTAKINGS REVIEWED BY THE FORT CARSON CRMP DURING THE FY22 REPORTING PERIOD (OCTOBER 1, 2021  
 THROUGH SEPTEMBER 30, 2022) 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
2022-013 Conduct Additional Prescribed Fire and Wildland Fuels Reduction Plan for New Live Fire Ranges, PCMS	DPW22-001	PCMS Numbered TAs	PC B4b	10/20/2021	Information provided to proponent for avoidance of protected cultural resources.
2022-026 Prairie Dog Control FY22, Fort Carson and PCMS	DPW22-002	Main Post  Downrange Fort Carson  PCMS Cantonment  PCMS Numbered TAs	BE I.B3 FC D2b PC A3b PC B4b2	11/9/2021 8/31/2022	Proposed work includes the elimination of prairie dog colonies with rodenticides and flea control with insecticides. Treatments will take place at Butts Army Airfield; Wilderness Rd./TA 5; Ranges 11, 24, 29, 45, 57, 104, 109, 117, 119, 121C, 127, 127A, 139, 151, & 155; and Turkey Creek Complex on Fort Carson; the 11A MOUT site (4 Corners); TA10C Pipeline East; MSR1 & County Rd. 76.1; MSR 3 Pipeline South; and DZ Pronghorn at PCMS; and PCMS Airfield.  Section 106 consultation was completed in July 2019 for the Turkey Creek Complex as part of NEPA Project No. 2019-168.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-060, 2022-134, 2022-228 FY22 Quarterly Advisory REC for Training on FC and PCMS	DPT22QRT2, DPT22QRT3 DPT22QTR4	Main Post Downrange Fort Carson  PCMS Numbered TAs  PCMS Lettered TAs  PCMS Training Area A	BE I.C3 FC A FC B FC C PC B1 PC B1 PC B2 PC B3 PC C1 PC C2 PC D1 PC D2	12/21/2021 3/21/2022 6/27/2022	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.
2022-082 Trench Cables at Mincic Ranch & Sharps Ranch, PCMS	PCM22-001	PCMS Numbered TAs  PCMS Lettered TAs	PC B4a1	1/28/2022	Two trenches, one at Mincic Ranch and another at Sharps Ranch, will be excavated to bury new power cable from power junction box to the existing Training Tuff Sheds at both locations.  Section 106 consultation was completed in February 2022 for Sharps Ranch.



USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-117 Placement of Two Poles for Rope Obstacle - JROTC Training, Training Area (TA) 10C, Pinon Canyon	n/a	PCMS Numbered TAs	PC B3	3/8/2022	
2022-148 & 2022-176 Construct Training Support Storage Facility, PCMS	DPT20-019	PCMS Numbered TAs	PC B4a1	3/31/2022 5/4/2022	2022-148 is the initial review for the project. Project was cancelled before review was completed.  Proposed work include: install a 24"Wx36"Lx12"H facility on concrete platform with electrical and HVAC across from Range 3.
2022-180 Paint Communication Towers, Ft. Carson, PCMS, and Pueblo Chemical Depot	DIR22-002	Main Post  Downrange Fort Carson  Pueblo Depot  PCMS Numbered TAs  PCMS Training Area A	BE I.A2 FC D1a PC B4a2 PC D3a1	5/6/2022	
2022-203 Invasive Species Control 2022-2023, Fort Carson & PCMS	n/a	Main Post  Downrange Fort Carson  PCMS Numbered TAs  PCMS Lettered TAs  PCMS Training Area A	BE I.B3 FC D2b PC B4b2 PC C3b2 PC D3b2	5/31/2022	The project is to eradicate invasive plant species using mechanical, biological, and/or approved chemical treatment on the identified areas at Fort Carson and PCMS.  Information has been provided to the proponent for avoidance of protected cultural resources.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Exemption(s) Used	Date(s) Reviewed	Remarks
2022-211 Construct Range Control Tower and Ammo Break Down Building, Range 3, PCMS	DPT22-019	PCMS Numbered TAs	PC B4a1 PC B4a2	6/8/2022	Proposed work includes:
2022-217 Lands and Rehabilitation and Maintenance Tasks, TAs 2, 7A, 10C, & 12, PCMS	DPT22-007	PCMS Numbered TAs	PC B4a1 PC B4a2	6/10/2022	Proposed work includes:
2022-246 Construct Range Control Tower and Ammo Break Down Building Range 1 and 7 PCMS	DPT22-021	Main Post	PC B4a1 PC B4a2	8/3/2022	

**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
2022-043 Off-Installation Low Elevation Flight Training, Fort Carson & PCMS	n/a		11/30/2021		<p>Has been initiated but is not completed at the time of this report.</p> <p>Responses were received from the State Historic Preservation Officer, Pike-San Isbell National Forest &amp; Cimarron and Comanche National Grasslands, Edgar Ranches Inc., Huerfano County Commissioners, Las Animas County Commissioners, National Parks Service National Trails Intermountain Region, Not 1 More Acre!, Northern Cheyenne Tribe, Otero County Commissioners, Pawnee Nation of Oklahoma, and the Santa Fe Trail Association. Responses are being prepared at the time of this report.</p>
2022-082 Trench Cables at Mincic Ranch & Sharps Ranch, PCMS	PCM22-001	PCMS Numbered TAs  PCMS Lettered TAs	1/28/2022	HC #81097 3/10/2022	<p>No adverse effect to historic properties.</p> <p>Responses were also received from Comanche Nation of Oklahoma, Northern Cheyenne Tribe, and Pawnee Nation of Oklahoma; all parties agreed with the finding of effect.</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
CF2021-010 Downed Tree at Sharps Ranch (5LA5825)	NA	Sharps Ranch	6/7/2022	HC#81575 06/10/2022	No adverse effect to historic properties.  Responses were also received from Comanche Nation of Oklahoma, Pawnee Nation of Oklahoma, and Southern Ute Indian Tribe; all parties agreed with the finding of effect.

**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
2022-079 Annual Update to 2020-2025 INCRMP	n/a	Main Post Downrange Fort Carson PCMS Cantonment PCMS Numbered TAs PCMS Lettered TAs PCMS Training Area A	1/12/2022	Document review
2022-107 USAFA Combat Survival Training at PCMS May-July 2022	n/a	PCMS Numbered TAs PCMS Lettered TAs	3/22/2022	USAFA CWT proposes to conduct part of the proposed Combat Survival Training (CST) at PCMS that will include shelter craft, food procurement, signaling (no flare), navigation, medical, evasion, and recovery.  Information has been provided to the proponent for avoidance of protected cultural resources.

USAG Fort Carson NEPA Project Number(s) & Project Title	USAG Fort Carson Project Number(s)	Location (APE)	Date(s) Reviewed	Remarks
CF2022-001 BLM Oil and Gas Lease Sales Adjacent to PCMS	NA	BLM Lands adjacent to PCMS	11/12/2022	Fort Carson CRM was made aware that there was a proposal to lease land for oil and gas development. The CRM coordinated with the BLM Field Office and provided information on potential impacts to protected resources. The BLM will continue to coordinate with Fort Carson CRMs on the proposals and the assessment of effects.

**ENCLOSURE 2:  
PCMS PA TASK TRACKER  
(CURRENT AS OF SEPTEMBER 30, 2022)**

Stipulation	Action	Duration	Date Required	Remarks
I.A.1	GIS shapefiles and master site index provided to SHPO	90 days after signing	7/22/2014	Completed; provide updates as necessary
I.A.2	Cultural resources documentation submitted to SHPO	180 days after signing	10/20/2014	Completed; provide updates as necessary
I.A.3	SHPO notifies USAG that information baseline has been created and request any missing information	1 year after completion of I.A.2	4/02/2015	Completed
I.A.4	USAG and SHPO consult to address any data discrepancies	180 days after completion of I.A.3	7/05/2016	Completed (HC #63877); consult as needed on any data discrepancies that may arise.
I.A.4	Implement agreeable terms to reconcile discrepancies	3 years after completion of I.A.4 task above	7/05/2016	Completed (HC #63877).

Stipulation	Action	Duration	Date Required	Remarks
I.B	Complete documentation on needs data sites or implement a protection measure	3 years after signing	04/22/2017	<p>Completed</p> <p>FY19: Contract awarded in September 2018 to develop research designs for 71 sites. Research designs for 32 sites are being reviewed by the CRM. Research designs for 39 sites were submitted for SHPO review. Comments are being addressed. Project is ongoing.</p> <p>FY20: Contract awarded in September 2019 to evaluate 58 isolated finds. Fieldwork has been completed. CRM is awaiting submission of the preliminary draft technical report and site documentation. Project is ongoing.</p> <p>FY20: Contract awarded in September 2019 to conduct a traditional use study of the Hogback. Site visits are scheduled to begin in October of 2021.</p> <p>567 resources have been determined “needs data,” with which SHPO concurs. Research designs are being drafted for 71 of these sites located within the primary maneuver areas and along canyon rims. Documentation and evaluation to modern-day standards of an additional 58 of these resources (categorized as isolated finds) is ongoing.</p> <p><b>Protection strategies have been implemented at the “Needs Data Sites.”</b></p>
I.B.1	SHPO concurrence with NRHP eligibility determinations from re-evaluations	60 days after submission	TBD	



Stipulation	Action	Duration	Date Required	Remarks
I.D	Continue consultation with Tribes concerning site protection, monitoring frequencies, and TCPs and sacred sites identification	Ongoing action	n/a	Consultation meeting was held in person, with a virtual option, April 5, 2022 through April 7, 2022. In attendance were representatives from the Cheyenne and Arapaho Tribes of Oklahoma, Cheyenne River Sioux, Comanche Nation of Oklahoma, Jicarilla Apache Nation, Northern Arapaho Tribe, Pawnee Nation of Oklahoma, Rosebud Sioux Tribe, Southern Ute Indian Tribe, and the Standing Rock Sioux Tribe.
III.A	Implement site protection measures		04/22/2017	415 of 1,200 protected sites have a protection fence, Seibert markers, boulders, or combination; 191 have corner markers only; 126 are terrain protected (i.e. no vehicle access); all others are administratively protected.
III.B	Propose amended site protection measures and monitoring frequencies	As needed	n/a	No proposed changes during reporting period
III.D	Provide training vehicles/aircraft with means of knowing site locations	1 year after signing	04/22/2015	Completed; update as necessary
IV.A	Monitor protected cultural properties	Ongoing action	n/a	Working with Fort Carson Conservation Law Enforcement Officers to conduct routine inspections.  FY21: Contract awarded in April 2021 to assist with monitoring activities.
V.A	Implement cultural awareness training of all personnel involved in the execution of undertakings	Annually	n/a	Cultural resources awareness training is part of the annual mandatory training for Soldiers, Civilians, and contractors.
VI.C	Annual meeting with consulting parties	Annually	NLT Feb. 15 <sup>th</sup>	Consultation meeting was held virtually on January 12, 2022. In attendance were representatives from the ACHP, Colorado SHPO, La Animas County, Colorado Council on Professional Archaeologists, Standing Rock Sioux Tribe, Northern Arapaho Tribe, Southern Ute of Oklahoma, Comanche Nation of Oklahoma, Comanche National Grasslands and Not One More Acre!

Stipulation	Action	Duration	Date Required	Remarks
VII.AG	Implement terms through policies and ICRMP	Ongoing action	n/a	ICRMP signed by Garrison Commander on 05/01/2017.  The ICRMP renewed for FY22 with no changes. Additional updates will be completed as CRM moves through the Army Alternate Procedures process.

**ENCLOSURE 3:**  
**SHPO CORRESPONDENCE ON FY21 ANNUAL REPORT**



# History Colorado

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

Re: Fiscal Year (FY) 2021 Annual Reports: Fort Carson Built Environment (HC#58731), Fort Carson Downrange (HC#63877), and Pinon Canyon Maneuver Site (HC#65747)

Dear Mr. Rivero-deAguilar:

Thank you for your correspondence dated and received by our office on November 15, 2020 regarding review of the Fiscal Year 2021 (FY 21) Annual Reports provided to fulfill:

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

For comments to specific portions of the Annual Reports, please see the appropriate attachment [(Attachment 1—Built Environment, Attachment 2—Down Range Fort Carson (DRFC), Attachment 3—Pinon Canyon (PCMS)]. Below, we describe a few general comments which we feel apply more broadly to the cultural resources managed by USAG Fort Carson.

Similar to our comments on the FY 2018-2020 annual reports, our first general comment concerns the training exercises conducted by USAG Fort Carson. Our previous comments noted that military use of the landscape has the potential to adversely affect historic properties. While we agreed with the minimization efforts implemented, we requested that USAG Fort Carson initiate consultation with our office on mitigating adverse effects. In your 2019-2021 responses to our comments on annual reports, you acknowledged that the trainings were causing adverse effects and that the Programmatic Agreements (PAs) require consultation to resolve those effects according to 36 CFR 800.6. Your responses, however, also noted that USAG Fort Carson only considers adverse effects on a “case-by-case basis” and that you “do not agree to an overarching approach to mitigation.” While your January 2021 letter acknowledged that an overarching approach may be appropriate to resolve adverse effects to historic properties in PCMS, your 2021 letter appeared to discuss primarily “case-by-case” approaches.

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



# History Colorado

a larger scale. While your January 2021 letter agrees that traditional cultural properties (TCP) should be considered on a broader scale, your letter does not address historic properties that do not comprise TCPs.

The relationship between the various resources is important to understanding the area's past and the cultural landscape may comprise an important aspect of a resource's significance. Without the development of an effective resource strategy, important information may be lost due to cumulative effects of these exercises and not all of the adverse effects may be appropriately mitigated. We request that consultations regarding resolution of adverse effects continue and that USAG Fort Carson continues its commitment to resolve adverse effects.

We also continue to argue that while there are many factors that contribute to negative impacts to individual sites, when looking at quantitative information regarding sites entered at Pinon Canyon Maneuver Site (PCMS), the data does not suggest that the current Cultural Awareness Program is effectively reducing the frequency of inadvertent entries. We appreciate the additional information provided on the Program's trainings and are encouraged to hear about potential successes and that the Program staff have had increased integration into military exercises. We, however, note that resources continue to experience inadvertent entries. In some instances, inadvertent entries occur on a regular basis in sites as noted in our 2020 correspondence.

We continue to argue that a quantifiable analysis of the effectiveness of the training would help in determining gaps in the training program. Please see our 2020 letter for additional details. Education specialists have developed tools and analyses to study the effectiveness of educational programs which could be adapted to study the effectiveness of the USAG Fort Carson's Cultural Awareness Program.

While your January 2021 letter notes that cultural resource awareness training is provided to all leaders, the provided documentation does not discuss the type of training provided to different levels of personnel. We continue to note from our FY 20 response that training emphasized for both high and low ranking personnel that incorporates varying methods and formats as well as information oriented to different groups will help ensure the efficacy of the program.

Besides the discussion above, we continue to recommend studying the effectiveness of the minimization and avoidance measures being employed. Using 5PE.2966 as an example, inadvertent entries occurred at the site despite the presence of markers that surround the site. We continue to support the minimization and avoidance measures currently being employed. We, however, recommend studying how these measures fail and determining potential improvements or additional measures to avoid and minimize inadvertent entries.

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

Sincerely,

**Dr. Holly Kathryn Norton**

Dawn DiPrince  
State Historic Preservation Officer

Digitally signed by Dr. Holly Kathryn

Norton

Date: 2021.12.10 13:17:34 -07'00'



# History Colorado

## Attachment 1:

### SHPO Comments on FY 2021 Fort Carson Built Environment PA Annual Report (HC# 58731)

#### **I. Exempted Undertakings**

No comments.

#### **II. Non-Exempted Undertakings**

No comments.

#### **III. Action Updates**

##### **A. Cultural Resources Awareness Training**

No comments.

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

No comments.

##### **C. Exempted Undertakings**

No comments.

##### **D. Expanding the APEs for Exempted Undertakings**

No comments.

##### **E. Inadvertent Discoveries**

No comments.

##### **F. Emergency Response per 36 CFR 800.12**

No comments.

##### **G. Amendment**

No comments.

##### **H. Dispute Resolution**

No comments.



# History Colorado

## Attachment 2:

### SHPO Comments on FY 2021 Down Range Fort Carson PA Annual Report (HC# 63877)

#### I. Exempted Undertakings

No comments.

#### II. Non-Exempted Undertakings

2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System.

2019-134: We appreciate the offer to conduct a site visit for 2019-134 and look forward to meeting with you in the future regarding this undertaking.

2021-195: We look forward to continuing consultation on this undertaking.

2020-249: We look forward to consulting with you regarding 2020-249.

#### III. Action Updates

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

I.C: As noted in our FY 20 response, we appreciate the efforts to evaluate the eligibility of resources determined as “needs data.” We, however, note that additional research is needed for additional archaeological sites. In particular, we note that research is needed for the Turkey Creek Rock Art Historic District.

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

Your letter dated October 2020 responded to our comments that you will collaborate with tribes in the future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommended studying the traditional use of the landscape. We previously agreed with these recommendations in our FY 20 response. We look forward to further consultation regarding the district and any potential traditional cultural properties.



# History Colorado

III.E: We appreciate the information provided with your November 2021 correspondence regarding trainings. We continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. While this reporting year resulted in a decrease in inadvertent entries by training exercises, we note that exercises inadvertently entered resources as recently as the previous year and sometimes result in the entering of the same resource on a regular basis. Understanding and analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries. Further, understanding the reason for this reporting year's decrease in inadvertent entries may help management understand the effectiveness of management practices and provide guidance for approaches to cultural resource management in future years.

VI.A. Please refer to our comments in our letter.

VI.B: We note that in April 2020 we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. We look forward to reviewing the scope of work and the results of this study.

## B. Cultural Resource Awareness Training

We appreciate USAG Fort Carson's November 2021 letter that provided additional information concerning the current training activities. To reiterate, while we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.

Your January 2021 correspondence notes that personnel from all levels receive training. We are encouraged to hear that training is implemented throughout the various levels. All command positions should be aware of and take responsibilities to comply with regulations and laws to protect cultural resources. The documentation, however, does not provide details on whether different trainings are provided for individuals from different levels or positions. Developing training for different levels or positions can help the effectiveness of the program. Further, quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.

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

We appreciate USAG Fort Carson's efforts to document inadvertent entries and cumulative effects to historic properties. The provided documentation notes that no inadvertent entries have occurred during the reporting year with the exception of a response to a wildfire. It might be beneficial to understand what led to the decline in inadvertent entries over the 2021 reporting year. Was the decline in inadvertent entries related to increased awareness, planning, and training or was this trend unrelated to any planned measures? We note that as recently as FY 20 exercises continued to inadvertently enter historic properties. We continue to recommend analyzing the effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.

## D. Inadvertent Discoveries

No comments.

## E. Emergency Response

No comments.





# History Colorado

F. Amendment

No comments.

G. Dispute Resolution

No comments.

H. Other

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



**Attachment 3:  
SHPO Comments on FY 2021 PCMS PA Annual Report (HC# 65747)**

**I. Exempted Undertakings**

No comments.

**II. Non-Exempted Undertakings**

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

CF2020-008: We look forward to reviewing the results of the fieldwork.

CF2020-014: We look forward to reviewing the results of the fieldwork.

2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System

2021-269: We look forward to consulting on this undertaking.

**III. Action Updates**

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

I.B: As stated in our response to the FY 20 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 and January 2021 correspondences, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.

We look forward to reviewing the results of the FY 20 fieldwork. We also look forward to reviewing the results of your Hogback study.

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

III.D: We appreciate the information provided in your January and November 2021 correspondences. We, however, continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on a regular basis. Analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.

**B. Cultural Resource Awareness Training**

Please refer to our comments in our letter regarding trainings.

**C. Brigade Training Exercises**



# History Colorado

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

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

We look forward to reviewing the documentation concerning CF2021-008-010. While not identified in the provided documentation, we understand that inadvertent entries occurred in 5LA.7311 and 5LA.7351. We were notified of the inadvertent entries on February 16, 2021 through email. We understand that documentation regarding the inadvertent entries will be submitted to our office for review in the future. We look forward to consulting on these inadvertent entries.

## E. Inadvertent Discoveries

No comments.

## F. Emergency Response

No comments.

## G. Amendment

No comments.

## H. Dispute Resolution

No comments.

## I. Other.

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



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

February 2, 2022

Ms. Dawn DiPrince, State Historic Preservation Officer  
History Colorado  
1200 Broadway  
Denver, Colorado 80203

Dear Ms. DiPrince:

Thank you for your correspondence dated December 14, 2021, concerning your review of the fiscal year (FY) 2021 annual reports for the three U.S. Army Garrison (USAG) Fort Carson programmatic agreements. The intention of this letter is to address your comments on mitigation efforts to resolve for adverse effects related to military use of Fort Carson and Piñon Canyon Maneuver Site (PCMS) and our cultural resources awareness training program.

There appears to be confusion concerning USAG Fort Carson's stance on resolving adverse effects to historic properties associated with military training. As our January 2021 letter explained, the *Programmatic Agreement on Military Training and Operational Support Activities at Down Range Fort Carson* (Fort Carson Downrange PA) included an overarching mitigation approach that was agreed upon by your office, the Advisory Council on Historic Preservation (ACHP), and USAG Fort Carson to resolve for potential adverse effects related to military training at 22 resources and unknown historic properties in areas that would not be surveyed. In addition, all signatories acknowledged that inadvertent entries during military training would occur at historic properties; therefore, the Fort Carson Downrange PA stipulated the implementation of a very robust inspection and monitoring program. Since the execution of the Fort Carson Downrange PA in 2014, only eight protected resources at Fort Carson have been entered during military training, with multiple entries occurring only at one resource, 5PE2966, and adverse effects occurring at two resources, 5PE2966 and 5PE8157. Considering the high operational tempo of military training downrange and low number of protected resources entered, one can reasonably conclude that our protection measures and cultural resources awareness training have been quite successful and protective of cultural resources. Considering also, that only two historic properties have been adversely affected as a result of these recent entries, we do not agree *additional* broad scale mitigation is necessary to mitigate potential direct, indirect, and cumulative adverse effects related to military use of Fort Carson. As stated in our October 2020 and January 2021 letters, we will continue to consult on a case-by-case basis when potential adverse effects to historic properties at Fort Carson are identified.

On the other hand, USAG Fort Carson does agree an overarching approach to mitigation is the best course of action to resolve for potential direct, indirect, and cumulative adverse effects resulting from military use of the PCMS. This is the approach we are pursuing as we continue consultation to resolve for adverse effects to historic properties from past brigade exercises.

USAG Fort Carson respectfully disagrees again with your opinion that our current cultural resources awareness training is not effective. As explained in our December 2019 letter, comparing different brigade training exercises to arrive at conclusions on the cultural resource awareness training's effectiveness is a flawed approach and should not be used to judge it. What truly speaks to the success of the cultural resource awareness training is the open communication and cooperative planning lines established with the 4<sup>th</sup> Infantry Division leadership, as well as with other key Garrison organizations like the Directorate of Plans, Training, Mobilization, and Security. These entities regularly engage Cultural Resources Program staff in preplanning activities, such as battalion and brigade pre-exercise working group meetings. This collaboration has in our opinion greatly reduced the potential for and actual impacts to protected resources. Cultural Resources Program staff continually work with the 4<sup>th</sup> Infantry Division's geospatial staff to update and ensure protected resources are always included on paper and digital maps used by units during training.

Furthermore, each directorate, brigade, battalion, company, and contractor have designated Environmental Protection Officers (EPOs). An EPO is the point-of-contact for environmental matters and the primary contact for fulfilling the unit's environmental compliance and overall responsibilities. They receive 40 hours of environmental training, become certified and annually update their skills via 8 hour refresher training. EPOs advise the Commander or Director about significant environmental aspects and impacts, and serve as liaisons between the unit and the Environmental Division. A newly designated EPO's training covers cultural resource background, identification and protection requirements, and also includes cultural resources awareness training

Your letter states that our January 2021 letter "does not discuss the type of training provided to different levels of personnel." The Department of Army's Training and Doctrine Command Culture Center is responsible for developing and delivering cultural resources awareness training to all Army leaders, including field grade and general officers. This training is provided at various times in each Soldier's career through formal education and assignment-specific training. The type, length, and depth of training varies depending on the individual's assignment and rank.

There are no foolproof measures that will completely prevent inadvertent entries. USAG Fort Carson uses a combination of protection strategies, such as Seibert markers, maps, training, etc. to decrease the number of inadvertent entries; but protected resources will, from time to time, continue to be entered during military training and other activities, which is why we have an inspection and monitoring

program. USAG Fort Carson is fully dedicated to the protection of its cultural resources and is proud of its efforts and overall protective results.

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

Point of contact for this action are Jennifer Kolise, Cultural Resources Manager, [jennifer.r.kolise.civ@army.mil](mailto:jennifer.r.kolise.civ@army.mil), 719-725-8333.

Sincerely,

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Carlos Rivero-deAguilar  
Chief, Environmental Division

Enclosures

**Enclosure 1:**  
**USAG Fort Carson's Response to SHPO Comments on FY2021 Fort Carson  
Downrange PA Annual Report (HC #63877)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System.*

*2019-134: We appreciate the offer to conduct a site visit for 2019-134 and look forward to meeting with you in the future regarding this undertaking.*

*2021-195: We look forward to continuing consultation on this undertaking.*

*2020-249: We look forward to consulting with regarding 2020-249.*

**USAG Response:** Thank you for your comment.

**III. Action Updates**

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

*I.C: As noted in our FY 20 response, we appreciate the efforts to evaluate the eligibility of resources determined as "needs data." We, however, note that additional research is needed for additional archaeological sites. In particular, we note that research is needed for the Turkey Creek Rock Art Historic District.*

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

*many of the cultural resources in the Turkey Creek area, USAG Fort Carson first must resolve questions concerning the district.*

*Your letter dated October 2020 responded to our comments that you will collaborate with tribes in the future to document and develop management strategies for the historic district. You will consult with our office on this documentation and the potential contributing and non-contributing components of the district. You also recommend studying the traditional use of the landscape. We previously agreed with these recommendations in our FY 20 response. We look forward to further consultation regarding the district and any potential traditional cultural properties.*

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

*III.E: We appreciate the information provided with your November 2021 correspondence regarding trainings. We continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. While this reporting year resulted in a decrease in inadvertent entries by training exercises, we note that exercises inadvertently entered resources as recently as the previous year and sometimes result in the entering of the same resource on a regular basis. Understanding and analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries. Further, understanding the reason for this reporting year's decrease in inadvertent entries may help management understand the effectiveness of management practices and provide guidance for approaches to cultural resource management in future years.*

**USAG Response:** Since the inception of the inspection and monitoring program and the execution of the Fort Carson Downrange PA in 2014, the following provides the number of protected resources entered during military training reported for each fiscal year (FY):

- FY 14 – 0
- FY 15 – 0
- FY 16 – 0
- FY 17 – 0
- FY 18 – 2
- FY 19 – 5, with 5PE2966 entered twice that year
- FY 20 – 1
- FY 21 – 0

The above data show that this year is not an anomaly; there have been multiple years without incident. If anything, we need to ask ourselves why there was an increase in



military training-related entries in FY 19. There has not been a change in the operational tempo at Fort Carson over the last 8 years.

*VI.A: Please refer to our comments in our letter.*

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

*VI.B: We note that in April 2020 we requested an opportunity to review and comment on the finalized scope of work for the Historic Mining Context Study. We look forward to reviewing the scope of work and the results of this study.*

**USAG Response:** USAG Fort Carson has not been able to award the contract for the Historic Mining Context Study due to lack of funding. The tasks outlined in the draft scope of work that your office reviewed have not changed, but once we have funding available, your office will have an opportunity to review and comment on the final scope of work prior to award.

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

*We appreciate USAG Fort Carson's November 2021 letter that provided additional information concerning the current training activities. To reiterate, while we view the current education and training program as progress, we suggest that the inadvertent entries indicate that there is still room for improvement.*

*Your January 2021 correspondence notes that personnel from all levels receive training. We are encouraged to hear that training is implemented throughout the various levels. All command positions should be aware of and take responsibilities to comply with regulations and laws to protect cultural resources. The documentation, however, does not provide details on whether different trainings are provided for individuals from different levels or positions. Developing training for different levels or positions can help the effectiveness of the program. Further, quantifying and studying the effectiveness of the trainings will help to improve the program and identify potential gaps or weaknesses. Please refer to our comments in our letter for additional details.*

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

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

*We appreciate USAG Fort Carson's efforts to document inadvertent entries and cumulative effects to historic properties. The provided documentation notes that no inadvertent entries have occurred during the reporting year with the exception of a response to a wildfire. It might be beneficial to understand what led to the decline in inadvertent entries over the 2021 reporting year. Was the decline in inadvertent entries related to increased awareness, planning, and training or was this trend unrelated to any planned measures? We note that as recently as FY 20 exercises continued to inadvertently enter historic properties. We continue to recommend analyzing the*

*effectiveness of the current avoidance and minimization measures and the trainings and resources provided personnel. Please refer to our comments in our letter for additional details.*

**USAG Response:** This comment has been addressed above.

D. Inadvertent Discoveries

*No comments.*

E. Emergency Response

*No comments.*

F. Amendment

*No comments.*

G. Dispute Resolution

*No comments.*

H. Other

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

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

**Enclosure 2:**  
**USAG Fort Carson's Response to SHPO Comments on FY2021 PCMS PA Annual Report (HC #65747)**

**I. Exempted Undertakings**

*No comments.*

**II. Non-Exempted Undertakings**

*2019-285: We look forward to continuing consultation on this undertaking.*

*CF2020-008: We look forward to reviewing the results of the fieldwork.*

*CF2020-014: We look forward to reviewing the results of the fieldwork.*

*2021-006: We look forward to continuing consultation on this undertaking should USAG Fort Carson be selected to field the Maneuver Short Range Air Defense System.*

*2021-269: We look forward to consulting on this undertaking.*

**USAG Response:** Thank you for your comment.

**III. Action Updates**

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

*I.B: As stated in our response to the FY 20 annual report, we continue to argue that the current administrative protections used to protect resources that have not been fully evaluated for eligibility for the National Register of Historic Places are not providing adequate protections for the resources. Until additional measures are implemented for all needs data sites, this stipulation should not be considered fulfilled. As noted in your October 2020 and January 2021 correspondences, inadvertent entries occur in these resources. Considering the impacts that have occurred, we request consideration of additional protection measures. Stipulation III.B of the PA allows for the updating of protection measures to sites.*

**USAG Response:** Thank you for your comment. USAG Fort Carson respectfully disagrees. The majority of these need data sites are located in areas that are terrain-protected or otherwise not accessible to vehicles. As noted in your letter, placement of Seibert markers or other physical protection measures do not guarantee entries will not occur. Placement of physical protection measures is expensive and time-consuming. USAG Fort Carson believes our limited resources are better spent on protecting known historic properties or evaluating "needs data" sites.

*We look forward to reviewing the results of the FY 20 fieldwork. We also look forward to reviewing the results of your Hogback study.*

**USAG Response:** Thank you for your comment.

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

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

*III.D: We appreciate the information provided in your January and November 2021 correspondences. We, however, continue to recommend studying the effectiveness of the resources provided for the military exercises and to determine deficiencies. We note that the exercises continue to inadvertently enter resources sometimes entering the same resource on a regular basis. Analyzing deficiencies in the resources and trainings provided to personnel will help to reduce future inadvertent entries.*

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

**B. Cultural Resource Awareness Training**

*Please refer to our comments in our letter regarding trainings.*

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

**C. Brigade Training Exercises**

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

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

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

*We look forward to reviewing the documentation concerning CF2021-008-010. While not identified in the provided documentation, we understand that inadvertent entries occurred in 5LA.7311 and 5LA.7351. We were notified of the inadvertent entries on February 16, 2021 through email. We understand that documentation regarding the inadvertent entries will be submitted to our office for review in the future. We look forward to consulting on these inadvertent entries.*

**USAG Response:** Thank you for your comment. As a status update, all known protected resources within the Bent Canyon Wildland Fire footprint have been inspected, and site documentation has been updated. Once the site documentation has been reviewed, it will be forwarded to your office. Approximately 287 acres have been surveyed and 29 newly identified sites recorded. A technical report of investigations and

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

Not mentioning the inadvertent entries that occurred at 5LA7311 and 5LA7351 in the annual report was an oversight. These entries occurred during the site marking effort. Once the PCMS Archaeologists have finished documenting the entries, an after action report and updated site documentation will be submitted.

E. Inadvertent Discoveries

*No comments.*

F. Emergency Response

*No comments.*

G. Amendment

*No comments.*

H. Dispute Resolution

*No comments.*

I. Other

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

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

**ENCLOSURE 4:**  
**NOT 1 MORE ACRE! CORRESPONDENCE ON FY21 ANNUAL REPORT**

December 13, 2021

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

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

**Re: FY2021 Cultural Resources Annual Report/PCMS**

Dear Ms. Kolise:

On behalf of Not 1 More Acre! (N1MA!), these comments are submitted on Army's FY2021 Annual Report, required by the 2014 Programmatic Agreement (PA), pertaining to cultural resources at Piñon Canyon Maneuver Site (PCMS), Colorado.

**Same old, same old: No progress**

Sadly, the FY2021 Annual Report shows a lack of progress on almost all fronts in the protection of cultural resources at PCMS required by the National Historic Preservation Act (NHPA), 54 U.S.C. §300101 *et seq.*, and the 2014 PA. Indeed, reading between the lines, the situation appears to be dramatically worsening.

According to the military, approximately 93% of PCMS land has been inventoried for cultural resources. Of the 6,251 archaeological sites identified by the military, 576 have been determined to be eligible for inclusion in the National Register of Historic Places, and another 679 are presently undetermined but still may be found to be eligible. ICRMP 2017-21, Table 4-2 at 41.

Army has acknowledged these cultural sites are "precious" and, in 2014, purported to the public that it "takes its stewardship responsibilities in these areas very seriously." 2014 T&O EIS, A.3-14. Army has publicly pledged that training maneuvers would cause only "negligible to minor" adverse impacts to cultural resources at PCMS. 2014 T&O EIS, S-7.

Now, seven years later, as shown in the FY2021 Annual Report and demonstrated by ensuing events, that 2014 pledge has turned out to be hollow and, indeed, fraudulent.

**Instead of trying to stop cultural resources violations, Army is now trying to stop reporting of violations and “supersede” the agreement on which the violations were based**

Following a series of Army After Action Reports (AARs) through 2018, which detailed steadily increasing violations of the 2014 PA during Army brigade exercises at PCMS, Army decided to adopt a policy of *eliminating AARs rather than eliminating cultural resources violations*. The FY2021 Annual Report makes it obvious that Army’s plan now is to keep violations secret and hope they go undiscovered, rather than correct the problems that led to violations.

Strangely, despite the fact that there are two Stryker Brigades, one Armored Brigade, and a Combat Aviation Brigade stationed at Fort Carson – which falsely claims PCMS as its own – no brigade exercises of consequence were reported at PCMS in the FY2019, FY2020 and FY2021 Annual Reports.

The 2014 PA requires detailed AARs after *brigade-scale* exercises, which repeatedly showed increasing violations of the PA through 2018, damaging dozens and dozens of protected sites throughout PCMS.

At the same time, Army is not doing AARs due to an alleged lack of “brigade exercises.” Army, nevertheless, admits that the “operational tempo” of military training exercises at PCMS has “considerably” increased, including as noted in this year’s report, exercises by the U.S. Air Force, which is not a part of U.S. Army or Fort Carson. Encl. 1-5; 12/30/19 Army letter attached to FY2020 Annual Report, p.2.

At this late date, it is fair to conclude that Army is *evading* doing the post-exercise surveys and publishing truthful AARs associated with brigade exercises, *while at the same time increasing training exercises at PCMS, no doubt resulting in additional undiscovered and unreported damages to cultural resources there*.

Last year, the Colorado State Historic Preservation Office (SHPO) found that training exercises *smaller* than full-brigade exercises also caused adverse effects to cultural resources and requested consultation with Army on these smaller exercises.

But Army has repeatedly delayed complying with this request at PCMS by pointing to mitigation studies that have supposedly been in the works for nearly two years. Whatever progress may have occurred on these studies, it was not enough, as the annual report notes, to even require the generation of written correspondence with the historic property agencies over the last year.

Consultation based on cumulative evaluation of the effects of training exercises smaller than brigade-scale exercises, as proposed by state historic preservation officials, of course, would help eliminate the ongoing secrecy with which Army is operating at PCMS with regard to the effects of military training on cultural resources.



So Army is *dragging its feet* on potential remedies and *refusing to do AARs*, while *speeding up* military exercises at PCMS. The result, no doubt, is that more intrusions and damages on cultural sites at PCMS are likely occurring and ongoing, but going undiscovered and unremedied.

When these damages are (if ever) found, remedying damages at individual sites will not prevent the ongoing cumulative loss of other sites from ongoing and increasing training activities at PCMS.

Thus, what is occurring is Army's intentional implementation of a policy of, bit-by-bit, slowly destroying and eliminating protected historic sites at PCMS under the guise of "protecting these sites," but doing so on such an inadequate basis that protection won't be achieved; just a slower, less publicized destruction of these sites.

This is not compliance with the NHPA in any meaningful sense of the word, and it follows upon years of Army already being in violation of the NHPA from repeat violations of the 2014 PA, with dozens and dozens of incidents of tanks, military vehicles and earthshaking aviation assets driving through and over protected historic sites, many unmarked, at PCMS.

It is Army's plan, now, *not to get rid of the 2014 PA violations, but to get rid of the 2014 PA that establishes the standards that are being violated and requires reporting those violations*. AR III-G. Under Army's new plans that it is purportedly developing, the Fort Carson garrison commander, PCMS's failed manager, could just forego protecting cultural resources at PCMS if he or she determines that mitigation is not in the best public interest or is not financially or otherwise feasible. 69 Fed. Reg. 20584.

On top of that, Army is waiting in the wings with a plan to "mitigate" damage to cultural resources by stopping efforts to protect identified historic sites and *pack up and scatter the artifacts to museums!*

The FY2021 Annual Report *could have* documented: a) new and meaningful efforts to ensure that accurate and up-to-date GPS data on protected resources is being made available to all Army military vehicles in the field at PCMS; b) new and meaningful efforts to train higher ranking Army officials in the methods and goals of protecting cultural resources at PCMS; c) new and meaningful efforts to add substantial barriers and protections to existing protection of cultural sites, including many sites that have no protection other than so-called "administrative" protections; d) new and meaningful efforts to actually enforce prohibitions of off-road military vehicle traffic at PCMS; and e) new and meaningful efforts to prevent damage to repeatedly damaged sites without scattering the artifacts to museums.

Instead, what is documented is an attempt to just let the ongoing violations continue unabated and cover up the inevitable results.

The resulting ongoing pattern is: Army first wants to get rid of AARs, then the 2014 PA itself and, soon, even the actual protected historic sites that are getting in the way of the intensifying “tempo” of military operations at PCMS.

What could be more blatant?

### **Army is also hiding the environmental impacts**

None of this mentions, of course, the ongoing problems that Army has with the National Environmental Policy Act (NEPA). 42 U.S.C. §4331 *et seq.*

Seven years ago, Army did a Training and Operations Environmental Impact Statement (T&O EIS) that purported to examine the environmental impacts of military maneuvers at PCMS. This EIS was premised on a proposed action of training “Fort Carson Brigade Combat Teams (BCTs) in full brigade-size exercises at PCMS ...” S.3 at S-1. Army considered, but supposedly “abandoned,” plans for using PCMS as a regional training center for all types of military forces, not just Army brigades at Fort Carson. 2.3 at 2-36.

Further, Army pledged that military vehicles training at PCMS would stay on existing roads and trails, T&O EIS §2.2.2.4 at 2-25, a pledge which was never even remotely enforced, as shown by year after year of AARs for cultural resources.

Now, in 2021, this EIS is seriously out of date. Forty Most Asked Questions on NEPA Regulations, 46 Fed. Reg. 18026 at 18036 (1981)(“rule of thumb” that re-examination required if NEPA document is five years old).

Further, Army has abandoned its proposed action of using PCMS for Fort Carson brigade exercises (none reported for the last three years), but has instead switched to using PCMS with intensifying “tempo” as a national training center for armed forces of all types.

Consider, for example, the annual report’s reference to a U.S. Air Force exercise at PCMS this past year. Encl. 1-5. Also, during the Raider Focus Stryker training operation in April and May 2017, reportedly involving 4,000 soldiers and 1,000 pieces of equipment, media documented that the training force included 750 soldiers from Fort Sill, Okla., Fort Bragg, N.C., and Fort Hood, Texas (*La Junta Tribune-Democrat*, April 24, 2017).

Additionally, the old T&O EIS projected only “negligible to minor” adverse impacts to cultural resources at PCMS from training exercises, p. S-7. In 2017, Army again projected no significant impacts to cultural resources when updating its Integrated Cultural Resources Management Plan.

Now, as multiple, repeated violations of the cultural resources mitigation that Army assumed would protect cultural resources have occurred, and as Army seeks to remove the mitigation that resulted in the discovery and potential remedying of those violations, and as Army is preparing to remove actual protection for protected sites in favor of museum showings of

artifacts, that “negligible to minor” projection is definitively shown to have been false and contrary to the true state of affairs.

NEPA demands honest and updated disclosure to the public of obvious environmental impacts, including impacts to cultural resources. NHPA demands protection of cultural resources.

At this point, as a first priority, Army needs to come into compliance with NHPA and NEPA in an open and transparent way with meaningful enforceable standards that are the product of consultation and not merely the discretion of the garrison commander and that serve as a basis for *ongoing* efforts for attainment.

The garrison commander’s previous efforts to protect cultural resources have been repeatedly documented to be grossly inadequate, and his projection of potential impacts have been way off the mark. There is no basis, whatsoever, to believe that future such efforts will be anything other than more of the same or, more likely, worse.

Sincerely,

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

Jean Aguerre for Not 1 More Acre!



REPLY TO  
ATTENTION OF

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

February 22, 2022

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

Dear Ms. Aguerre:

Thank you your correspondence dated December 13, 2021, concerning the fiscal year (FY) 2021 Annual Report for the *Programmatic Agreement Regarding Military Training and Operational Support Activities at Piñon Canyon Maneuver Site, Fort Carson, Colorado* (PCMS PA). As stated in our October 27, 2021 letter, repeatedly answering the same comments with allegations that U.S. Army Garrison (USAG) Fort Carson has violated the National Historic Preservation Act, National Environmental Policy Act, and PCMS PA, diverts staff time and resources from the management of cultural resources and other duties. Please refer to USAG Fort Carson's previous responses to your comments concerning cultural resources management at Fort Carson and Piñon Canyon Maneuver Site. These include, but may not be limited to:

- June 24, 2021 response to April 30, 2021 letter concerning the proposed construction, operation, and maintenance of a cellular tower at PCMS (2019-285).
- November 10, 2020 response to December 17, 2019 letter concerning the FY2019 Annual Report for the PCMS PA;
- July 20, 2020 response to April 29, 2020 letter concerning the proposed construction of elevated maneuver trails at PCMS (2020-057).
- December 20, 2019 response to October 22, 2019 letter concerning the proposed operation of the MQ-1C Gray Eagle or similar unmanned aerial systems within the national airspace between Fort Carson and PCMS and above PCMS (2019-321);
- February 25, 2019 response to December 14, 2018 letter concerning the FY2018 Annual Report for the PCMS PA;
- March 9, 2018 response to January 30, 2018 letter concerning proposed amendments to the PCMS PA.

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

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

After-action investigations are conducted after brigade training exercises as stipulated in the PCMS PA and also after other events, such as wildland fires, major storm events, etc., at the discretion of the Cultural Resources Manager. Our routine inspection and long-term monitoring program identifies and documents any inadvertent entries or other impacts related to regular day-to-day military training and operational support activities in accordance with Section 6.5 of the Integrated Cultural Resources Management Plan, which can be found online at: <https://www.carson.army.mil/organizations/dpw.html>.

Your letter states that Army plans to mitigate “damage to cultural resources by stopping efforts to protect identified historic sites and *pack up and scatter the artifacts to museums!*” Your statement is inaccurate and misleading. USAG Fort Carson houses its archaeological collections at its curation facility that is located at 2420 Polio Street, Fort Carson. There is no plan to “scatter the artifacts to museums.” As you are probably aware, guidelines and standards for the management of federal archaeological collections can be found in 36 Code of Federal Regulations (CFR) Part 79. Only through agreed upon mitigations to resolve adverse effects to a historic property as stipulated in an executed Memorandum of Agreement with the Advisory Council on Historic Preservation (ACHP) and State Historic Preservation Officer (SHPO) will a historic property no longer be protected.

In September of 2021, USAG Fort Carson did notify the G9, ACHP, SHPO, Tribes, and other consulting parties of its intention to implement the Army Alternate Procedures (AAP). A Historic Properties Component, detailing how USAG Fort Carson will comply with the Section 106 review process of the National Historic Preservation Act, will be developed in consultation with all parties and certified by the ACHP prior to implementation of the AAP. As stated in your letter, an acceptable loss decision can be

made by the Garrison Commander if he or she has determined that mitigation is not in the best public interest or financially or otherwise feasible. The undertaking cannot proceed, however, until the Garrison Commander's determination is provided to the ACHP, SHPO, and other consulting parties for a 30-day review. Documentation of an acceptable loss determination must include a discussion on the decision-making process and a justification for not applying mitigation measures. The Garrison Commander must consider the ACHP's comments and will provide documentation of his or her decision to the ACHP, SHPO, and other consulting parties.

Point of contact for this action is Jennifer Kolise, Cultural Resources Manager, [jennifer.r.kolise.civ@army.mil](mailto:jennifer.r.kolise.civ@army.mil), 719-725-8333.

Sincerely,

RIVERO-  
DEAGUILAR.CAR  
LOS.1256627236

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

**Enclosure 5:**  
**Examples of Cultural Resources Awareness Training Materials**



# Cultural Resources Management

WHAT YOU NEED TO KNOW AS AN ENVIRONMENTAL PROTECTION OFFICER

## Course Objectives

You will learn:

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





# Fort Carson Cultural Resources Management Program

## Mission:

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



## Goals:

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

8/23/2017

FORT CARSON EPO COURSE

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# Fort Carson Cultural Resources Management Program

## Objectives:

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



Tribal representatives discuss the importance of a rock art panel.

8/23/2017

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# 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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# 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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## Fort Carson's Cultural Resources

### Fort Carson (as of August 2017):

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



### PCMS (as of August 2017):

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



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

8/23/2017

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## 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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## 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

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## 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

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

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

8/23/2017

FORT CARSON EPO COURSE

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## Scenario 1: Comanche Nation vs. United States

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

8/23/2017

FORT CARSON EPO COURSE

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## Scenario 1: Comanche Nation vs. United States

Comanche Nation asserted Fort Sill:

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

Outcome

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

8/23/2017

FORT CARSON EPO COURSE

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## Archaeological Resources Protection Act

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



8/23/2017

FORT CARSON EPO COURSE

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## Scenario 2: Graffiti

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



8/23/2017

FORT CARSON EPO COURSE

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## How Can You Help Protect and Preserve Cultural Resources?

### DO:

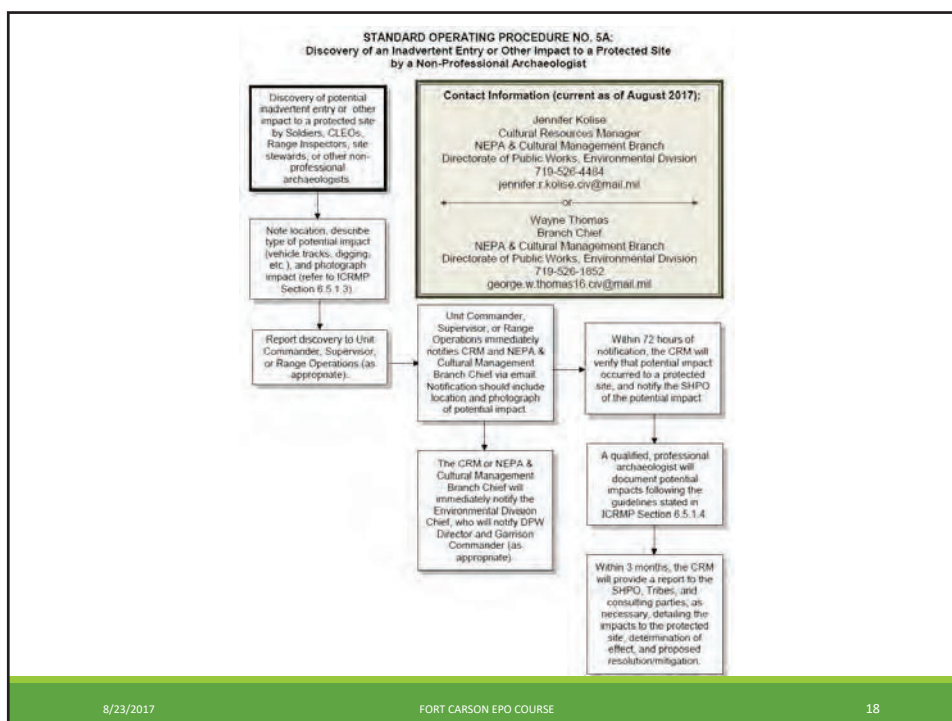
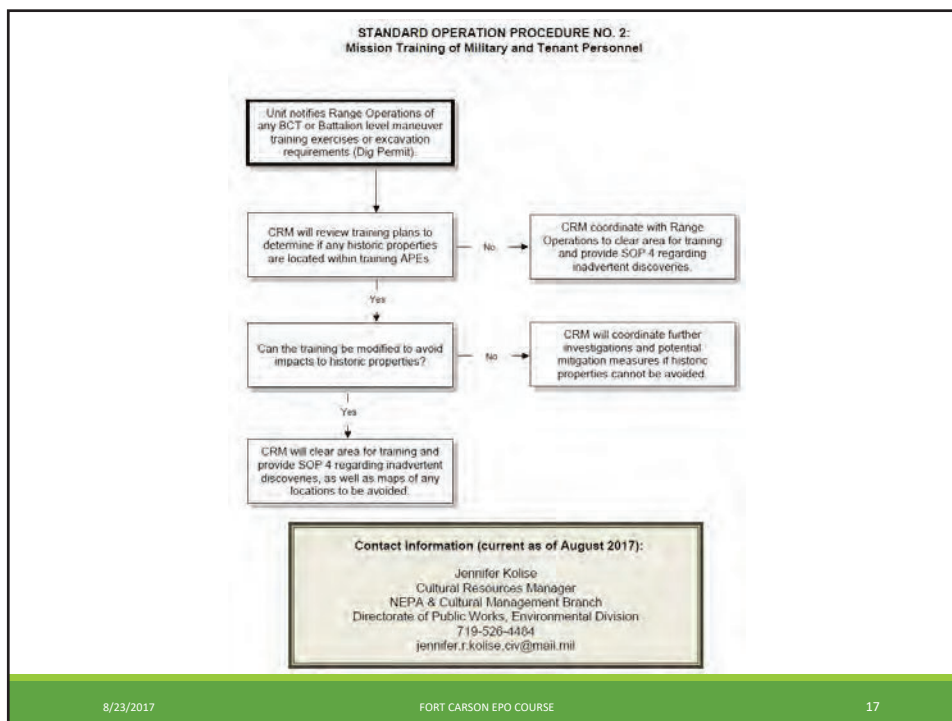
- Coordinate land use with Range Operations to ensure you are in an approved area.
  - **Especially excavation training (dig permit)**
  - Refer to ICRMP SOP No. 2
- Obey maneuver damage, environmental, and cultural resources protection policies and procedures.
- Observe posted signs, fencing, and Seibert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

8/23/2017

FORT CARSON EPO COURSE

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## How Can You Help Protect and Preserve Cultural Resources?

### **DON'T:**

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

8/23/2017

FORT CARSON EPO COURSE

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

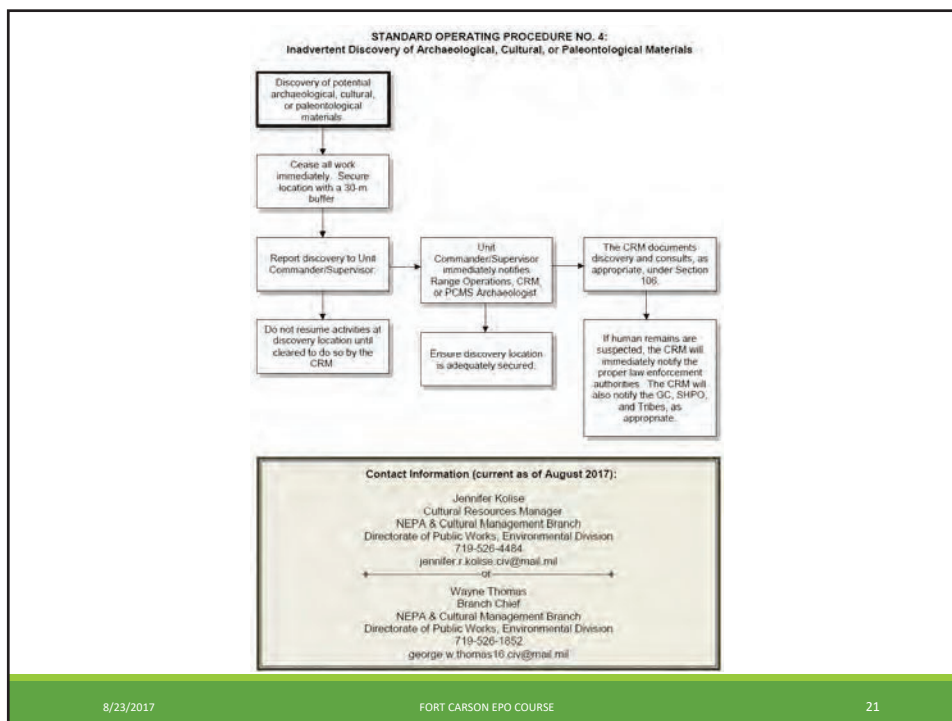
### **STOP WORK IMMEDIATELY**

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

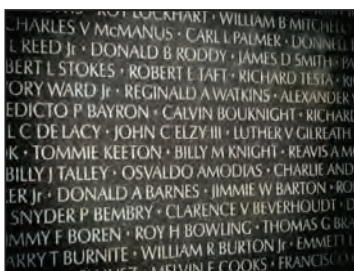
8/23/2017

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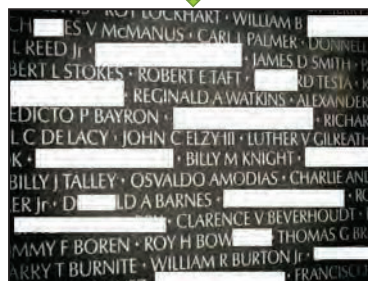


## What is the Harm in Taking a Souvenir?

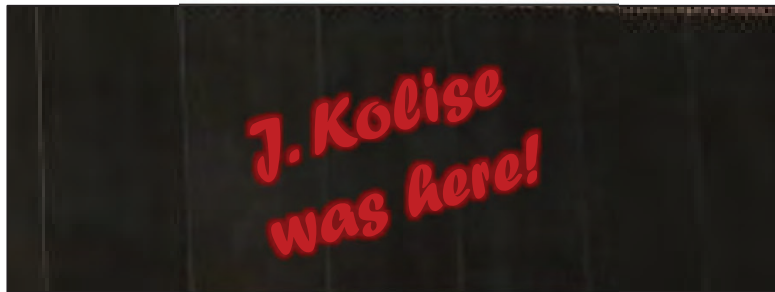


If every person who visited the Vietnam Memorial decided to take one name off as a souvenir, eventually there would be nothing left.

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

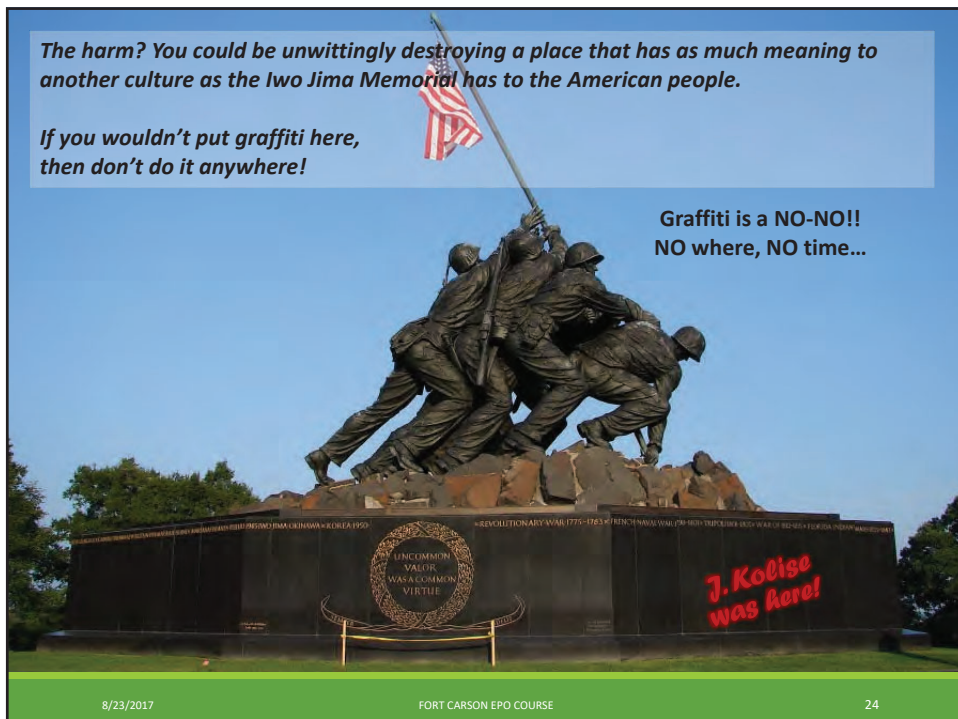
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*The harm? You could be unwittingly destroying a place that has as much meaning to another culture as the Iwo Jima Memorial has to the American people.*

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

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

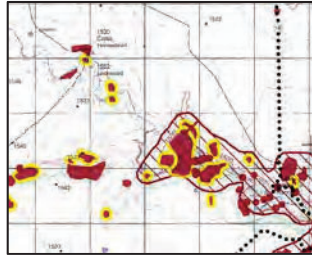


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24

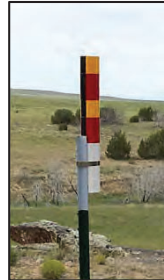
## Site Protection Measures



**Protected Resources JCR Map**

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

**No digging or mounted maneuvers within protected areas**

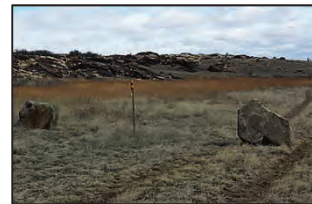


**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Seibert Markers and Boulders**

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25

## Where Can You Learn More?

### **Integrated Cultural Resources Management Plan (ICRMP)**

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

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26

## Main Points to Remember

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

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27

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

---

A. True

B. False

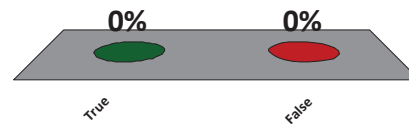
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FORT CARSON EPO COURSE

28

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

- A. True
- B. False



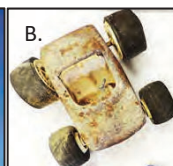
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FORT CARSON EPO COURSE

29

Which of the following would be considered a cultural resource?

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



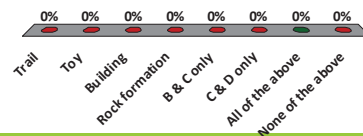
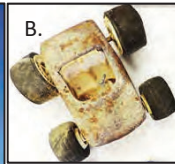
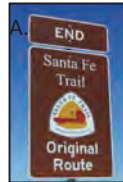
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FORT CARSON EPO COURSE

30

Which of the following would be considered a cultural resource?

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



8/23/2017

FORT CARSON EPO COURSE

31

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

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

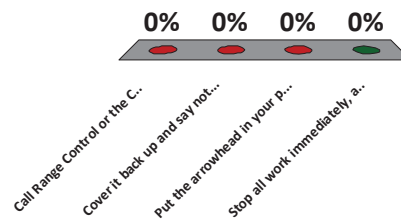
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FORT CARSON EPO COURSE

32

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- 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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FORT CARSON EPO COURSE

33

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

- A. True
- B. False

8/23/2017

FORT CARSON EPO COURSE

34



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

---

- A. True
- B. False






# CULTURAL RESOURCES

## POTENTIAL HAZARDS AND ENVIRONMENTAL CONCERNS

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

## HANDLING PROCEDURES

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

## GENERAL INFORMATION

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

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

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

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

1/11/2021

# IRON STRIKE OC TEAM BRIEF

## ENVIRONMENTAL CONSIDERATIONS

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Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## TOPICS

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

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## WHAT IS A PROTECTED RESOURCE?

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

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## CULTURAL RESOURCE EXAMPLES



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

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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## NATURAL RESOURCE EXAMPLES

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



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## CRITICAL INFRASTRUCTURE EXAMPLES

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



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 Craig Dengel, PCMS Archaeologist – 719-503-6136 – [craig.e.dengel.civ@mail.mil](mailto:craig.e.dengel.civ@mail.mil)



## HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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



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## COMPLIANCE REQUIREMENTS FOR PROTECTED RESOURCES

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

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

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## PROTECTED RESOURCES MAP SYMBOLS: UNMARKED PROTECTED RESOURCE



**Symbol:** Area polygon with red-filled interior

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

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

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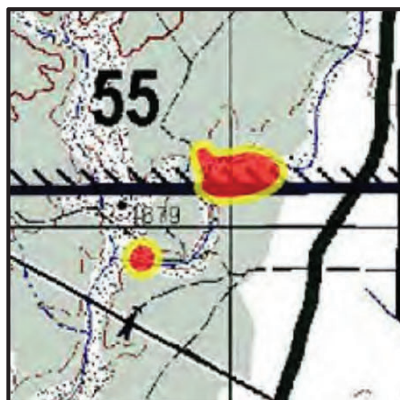


## PROTECTED RESOURCES MAP SYMBOLS: MARKED PROTECTED RESOURCE

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

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

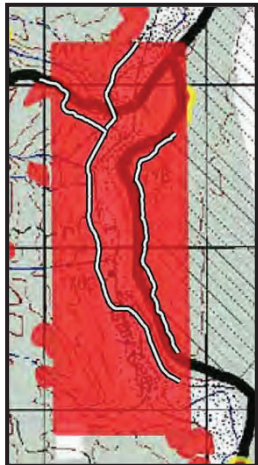
**Caveats:** Ensure the yellow outside perimeter is avoided at all times by vehicles. **Do not simply rely on the observed Seibert markers and/or fencing.**



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## PROTECTED RESOURCES MAP SYMBOLS: AUTHORIZED TRAVEL CORRIDOR



**Symbol:** White line interior and black outline

**Definition:** Corridors approved for travel through protected resources

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

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## PHYSICAL PROTECTION MEASURES



**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Boulders**

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## INADVERTENT ENTRY / IMPACT

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

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## NATURAL RESOURCES GUIDANCE

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

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

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## NATURAL RESOURCES GUIDANCE

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

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## NATURAL RESOURCES GUIDANCE

- Do not crush or cut trees unnecessarily.



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



Stock tanks provide drinking water for wildlife.

- Do not run over stock tanks or guzzlers.

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## CULTURAL RESOURCES GUIDANCE

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

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

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## CULTURAL RESOURCES GUIDANCE

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



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

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

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

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## SPILL RESPONSE

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

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

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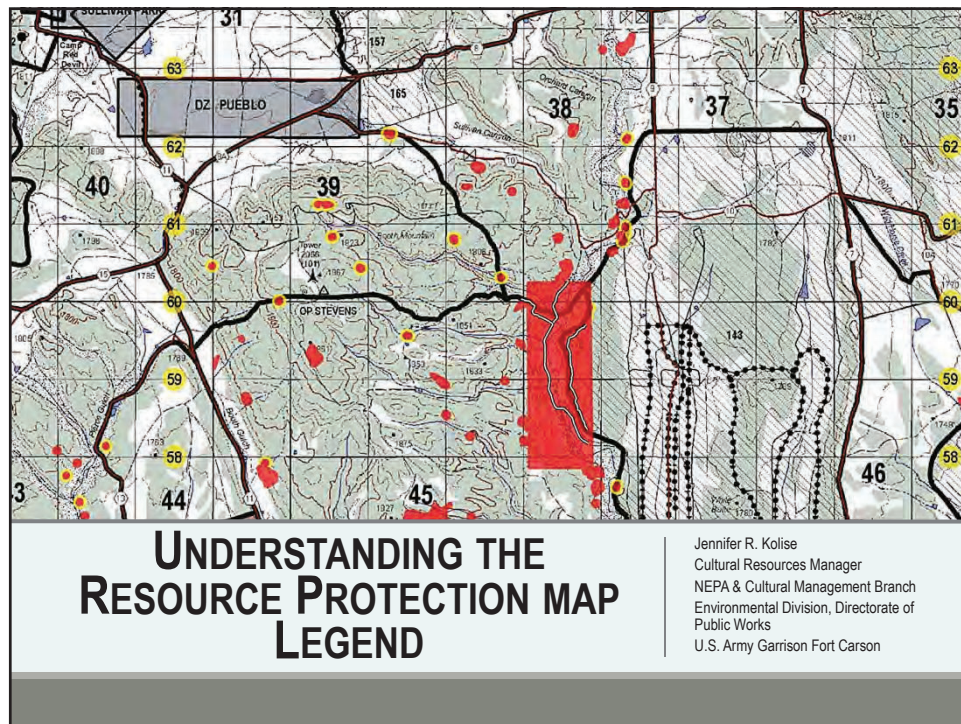


## IRON STRIKE DIG REQUEST PROCESS

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

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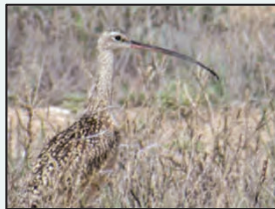
## WHAT IS A PROTECTED RESOURCE?

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



## NATURAL RESOURCE EXAMPLES

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



## CULTURAL RESOURCE EXAMPLES



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

## CRITICAL INFRASTRUCTURE EXAMPLES

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



## HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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



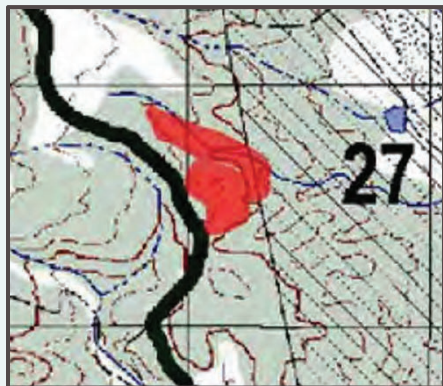


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- No aerial maneuvering allowed within 100 meters
- Travel allowed only on approved travel corridors through the area as shown on the map

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

## STANDARDIZED SYMBOL: UNMARKED RESOURCE



**Symbol:** Area polygon with red-filled interior

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

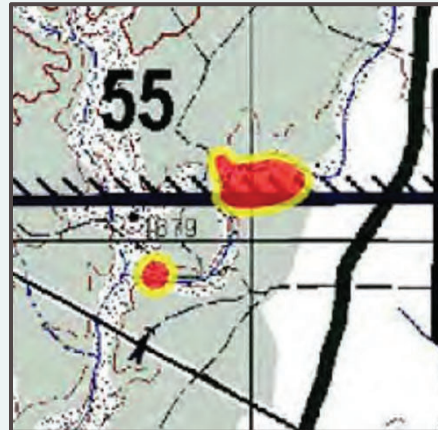
**Caveat:** Ensure the entire red perimeter is avoided at all times by vehicles. **Do not simply rely on the observed Seibert markers and/or fencing.**

## STANDARDIZED SYMBOL: MARKED RESOURCE

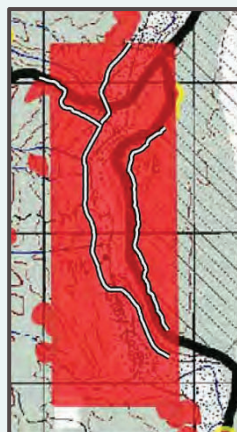
**Symbol:** Area polygon with red-filled interior and yellow outline (halo)

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

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



## STANDARDIZED SYMBOL: AUTHORIZED TRAVEL CORRIDOR THROUGH PROTECTED RESOURCE



**Symbol:** White line interior and black outline

**Definition:** Corridors approved for travel through protected resources

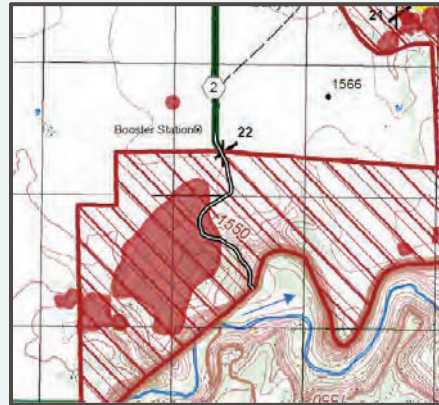
**Caveat:** No off-road travel allowed within protected resource. **Stay on the approved existing corridor only.**

## STANDARDIZED SYMBOL: DISMOUNTED ONLY AREAS

**Symbol:** Area polygon with red crosshatch

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

**Caveat:** These areas do not conform to topography.



## PHYSICAL PROTECTION MEASURES



**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Boulders**

# USAFA Cadet Survival Training

## ENVIRONMENTAL CONSIDERATIONS

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# TOPICS

Protected Resources

Wildlife Guidance

Cultural Resources Guidance

Spill Response

Dig Request Process



# WHAT IS A PROTECTED RESOURCE?

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





# CULTURAL RESOURCE EXAMPLES



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



# NATURAL RESOURCE EXAMPLES

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





# CRITICAL INFRASTRUCTURE EXAMPLES

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



# HUMAN HEALTH & SAFETY CONCERN EXAMPLES

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



# COMPLIANCE REQUIREMENTS FOR PROTECTED RESOURCES

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

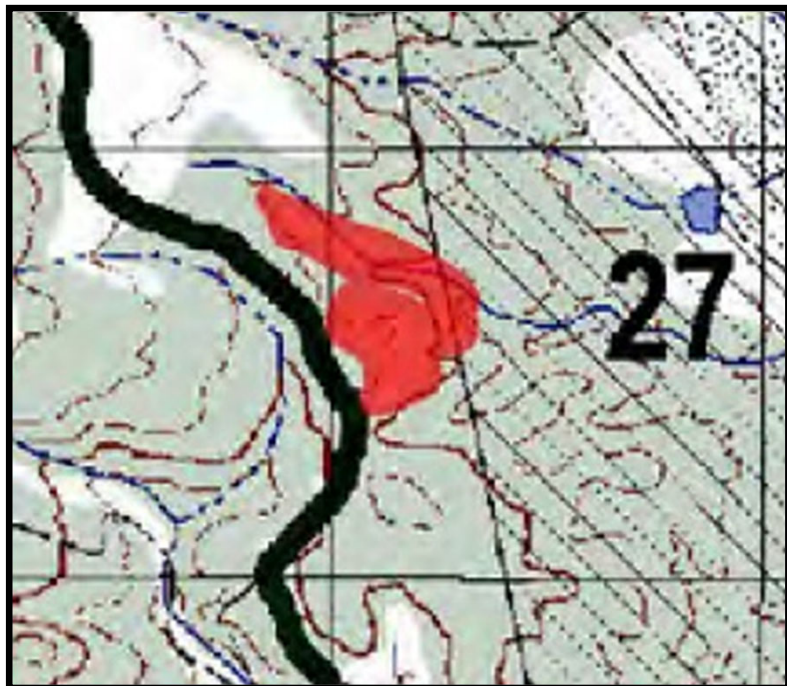
**Best Practice:** While operating a vehicle, implement a 30-meter stand-off distance from the perimeter of the protected resource as depicted on the map.





# PROTECTED RESOURCES MAP SYMBOLS:

## UNMARKED PROTECTED RESOURCE



**Symbol:** Area polygon with red-filled interior

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

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

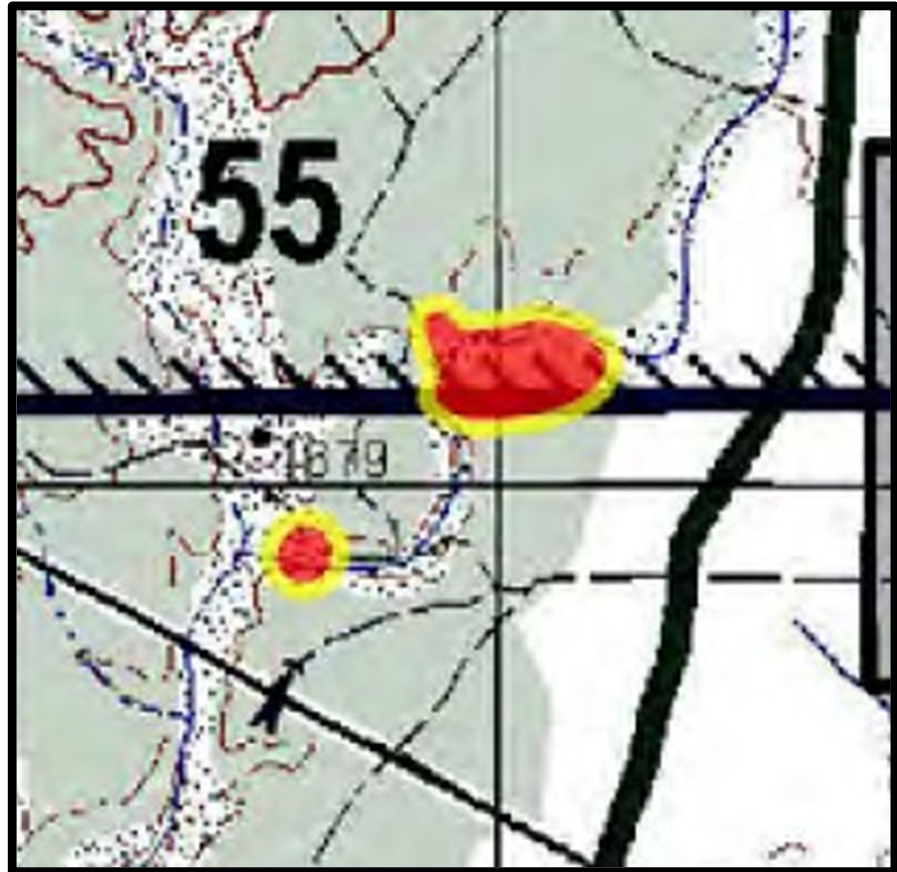


# PROTECTED RESOURCES MAP SYMBOLS: MARKED PROTECTED RESOURCE

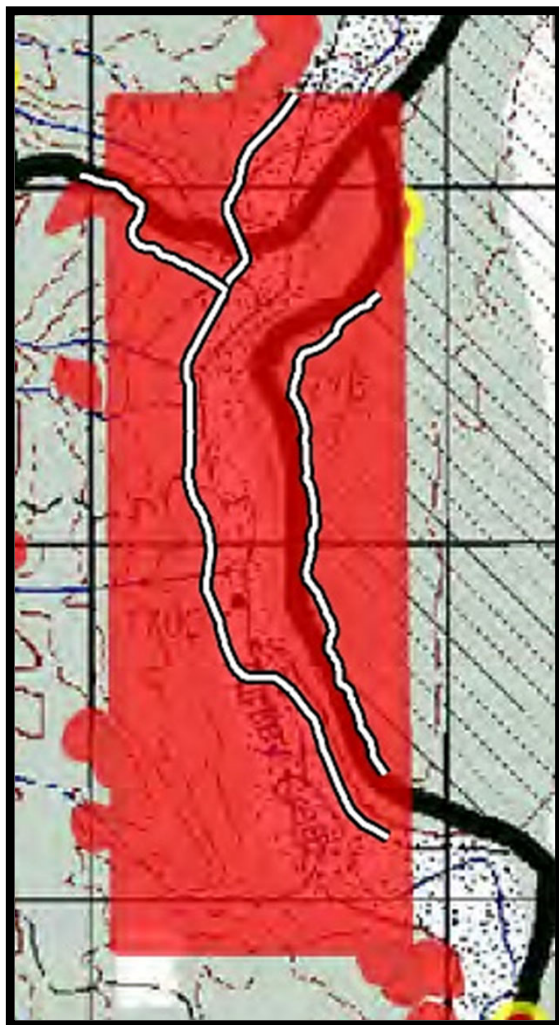
**Symbol:** Area polygon with red-filled interior and yellow outline (halo)

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

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



# PROTECTED RESOURCES MAP SYMBOLS: AUTHORIZED TRAVEL CORRIDOR



**Symbol:** White line interior and black outline

**Definition:** Corridors approved for travel through protected resources

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





# PHYSICAL PROTECTION MEASURES



**Seibert Marker**

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



**Protection Fences with Restricted Access Signs**



**Boulders**

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# INADVERTENT ENTRY / IMPACT

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





# NATURAL RESOURCES GUIDANCE

Refer to Fort Carson Environmental Battle Book, v 6.1, 2018

- Page 80, “Wildlife (Dangerous): Bears / Mountain Lions / Rattlesnakes / Coyotes”
- Page 81, “Wildlife (Migratory Birds): Songbirds / Raptors / Ravens / Etc.”
- Page 82, “Wildlife (Problem Critters): Raccoons / Skunks / Rodents / Non-Venomous Snakes / Etc.”
- Page 83, “ Wildlife (Sensitive or T&E Species): Prairie Dogs / Burrowing Owls”



# NATURAL RESOURCES GUIDANCE

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



# NATURAL RESOURCES GUIDANCE

- Do not crush or cut trees unnecessarily.



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



**Stock tanks provide drinking water for wildlife.**

- Do not run over stock tanks or guzzlers.



# CULTURAL RESOURCES GUIDANCE

Refer to Fort Carson Environmental Battle Book, v 6.1, 2018, page 31, “Cultural Resources” and Chapter 7 of the Integrated Cultural Resources Management Plan.

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





# CULTURAL RESOURCES GUIDANCE

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



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



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

- Stop work immediately.
- Flag a protective buffer around the location of the discovery.
- Report the discovery to Range Operations & Cultural Resources Manager and/or PCMS Archaeologists.
- You will be notified by the Cultural Resources Manager or PCMS Archaeologists when you can proceed.



# SPILL RESPONSE

Refer to Fort Carson Environmental Battle Book, v 6.1, 2018, page 68, “Spill Clean Up and Reporting Oil/Hazardous Substance.”

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



# CITED RESOURCES

Environmental Battle Book, v 6.1, 2018

<https://home.army.mil/carson/application/files/4116/4976/7771/environmental-battlebook.pdf>

Integrated Cultural Resources Management Plan

<https://home.army.mil/carson/application/files/3716/4934/6831/2017-2021-icrmp.pdf>

