

Integrated Cultural Resources Management Plan



Prepared for:

Camp Stanley Storage Activity
Boerne, Texas

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EXECUTIVE SUMMARY

The U.S. Department of the Army (the Army) developed this Integrated Cultural Resources Management Plan (ICRMP) to provide for effective management of cultural resources at Camp Stanley Storage Activity (CSSA). CSSA prepared an ICRMP in 1997 (SAIC 1997b) and prepared an update in 2009 (Parsons 2009); this plan updates that plan. CSSA is a U.S. Army installation located in Bexar County, Texas, 19 miles northwest of downtown San Antonio. It is a sub-installation of the McAlester Army Ammunition Plant, US Army Field Support Command, Army Materiel Command (McAAP, US AFSC, AMC). This ICRMP is a 5-year plan, for fiscal years (FY) 2015 through FY 2019. This plan summarizes the history and prehistory of the property, reviews past historical and archaeological survey efforts, outlines and assigns responsibilities for the management of cultural resources, and discusses related concerns and standard operating procedures (SOP) for CSSA. It discusses procedures that will help preserve the cultural resources of CSSA within the context of the agency's mission. This plan is intended for the use of any personnel involved in planning at CSSA.

The Army has completed its identification responsibilities at CSSA for archaeological resources under Section 110 of the National Historic Preservation Act (NHPA). However, the inventory of architectural resources required under Section 110 of the NHPA has not been completed. All buildings and structures constructed before 1945 have been surveyed. However, elements of the built environment that have reached or are approaching 50 years of age and were constructed after 1945 should be evaluated for eligibility for listing on the National Register of Historic Places (NRHP).

There are 40 known archaeological sites at CSSA, seven of which (41BX1163, 41BX1189, and 41BX1235, 41BX1170, 41BX1172, 41BX1179, and 41BX1188) have been recommended by archaeologists as potentially eligible for the NRHP pending further archival investigations to assess their significance, but have not had formal determinations of eligibility made by a federal agency. The Texas Historical Commission (THC), hereafter the State Historic Preservation Office (SHPO) concurred with these findings; therefore, seven of the archaeological sites at CSSA are potentially eligible for the NRHP. Goals of CSSA's cultural resources program should include: 1) Initiating consultation with Native American groups, if an undertaking is proposed that may affect a cultural resource affiliated with a federally recognized tribe; 2) conducting archival studies to assess the significance of potentially eligible archaeological sites on CSSA; 3) Evaluating non-evaluated buildings on CSSA that will have turned 50 years of age by 2014; and 4) Continuing its policing activities to prevent Archaeological Resource Protection Act (ARPA) violations.

The Army has yet to initiate consultation with federally recognized Native American tribes or groups to determine which historic properties or other areas of concern exist at CSSA related to NHPA, the Native American Graves Protection and Repatriation Act (NAGPRA), or the American Indian Religious Freedom Act (AIRFA). Three federally recognized tribes, the Mescalero Apache, the Tonkawa, and the Comanche, may include descendants from the CSSA area. Two additional tribes whose ancestors once lived in the CSSA area have petitioned for federal recognition and are potentially interested in consulting, if they obtain federal recognition: the Lipan Apache Band of Texas, and the Tap Pilam Coahuiltecons. No human remains of

Native Americans have been found on CSSA and none of the sites identified in the 1998 archaeological inventory were considered eligible for listing for the NRHP. Should Native American human remains be found or a new Native American archaeological sites be identified, CSSA would initiate consultation with federally recognized Native American tribes or groups.

The Environmental Program Manager (EPM) has the primary responsibility for managing cultural resources at CSSA on a day-to-day basis, and therefore, acts as the Cultural Resources Manager (CRM). This individual is assigned to the Safety & Environmental Office of CSSA's Installation Management Office (IMO). Section 4 outlines internal review procedures, and procedures for consultation with the SHPO, Advisory Council on Historic Preservation (ACHP), and the National Park Service (NPS). In the event that human remains or archaeological materials are inadvertently found, work in the area of the discovery will stop, and the individual responsible for implementing the work will notify the CRM immediately. The CRM will follow the procedures outlined in the SOP for inadvertent discovery.

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LIST OF ACRONYMS

AACOG	Alamo Area Council of Governments
ACHP	Advisory Council on Historic Preservation
AIRFA	American Indian Religious Freedom Act
AMC	Army Materiel Command
APE	Area of Potential Effects
AR	Army Regulation
ARPA	Archaeological Resources Protection Act of 1979
BIA	Bureau of Indian Affairs
CA	Comprehensive Agreement (per 43 CFR § 10)
CATEX	Categorical Exclusions
CERL	Construction Engineering Research Laboratory
CEQ	Council on Environmental Quality
CID	Criminal Investigation Division
CIS	Capital Investment Strategy
CFR	Code of Federal Regulations
CRM	Cultural Resources Manager
CRMP	Cultural Resources Management Plan
CSSA	Camp Stanley Storage Activity
DA PAM	Department of the Army Pamphlet
DCA	Department Consulting Archaeology
Demil	Demilitarization
DENIX	Defense Environmental Network and Information Exchange
DoD	Department of Defense
EA	Environmental Assessment
EBS	Environmental Baseline Survey
EIS	Environmental Impact Statement
EO	Executive Order
EOD	Explosive Ordnance Disposal
EPM	Environmental Program Manager

LIST OF ACRONYMS (*cont.*)

F	Fahrenheit
FOIA	Freedom of Information Act
FONSI	Finding of No Significant Impact
FR	Federal Regulation
FY	Fiscal Year
GIS	Geographic Information System
HABS/HAER	Historic American Building Survey/Historic American Engineering Record
HPP	Historic Preservation Plan
HQDA	Headquarters, Department of the Army
INCRMP	Integrated Natural and Cultural Resources Management Plan
ICRMP	Integrated Cultural Resources Management Plan
IMO	Installation Management Office
LEA	Layaway Economic Analysis
MAP	Military Assistance Program
MOA	Memorandum of Agreement (per 36 CFR 800)
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act of 1969, as amended
NHPA	National Historic Preservation Act of 1966, as amended
NPS	National Park Service
NRHP	National Register of Historic Places
OMB	Office of Management and Budget
PA	Programmatic Agreement (per 36 CFR 800)
PAO	Public Affairs Office
PLS	Planning Level Survey
POC	Point of Contact
RRAD	Red River Army Depot
REC	Record of Environmental Consideration
RPMP	Real Property Master Plan
SHPO	State Historic Preservation Officer
SOP	Standard Operating Procedures

LIST OF ACRONYMS (*cont.*)

SOW	Scope of Work
TARL	Texas Archaeological Research Laboratory
TCP	Traditional Cultural Property
THC	Texas Historical Commission
THPO	Tribal Historic Preservation Officer
TM	Technical Manual
USACE	U.S. Army Corps of Engineers
US AEC	U.S. Army Environmental Center
USDA-ARS	U.S. Department of Agriculture – Agricultural Research Service
USFWS	U.S. Fish and Wildlife Service
WPA	Works Progress Administration

SECTION 1 INTRODUCTION

1.1 ICRMP Purpose and Organization

The Camp Stanley Storage Activity (CSSA) Integrated Cultural Resources Management Plan (ICRMP) has been prepared to take historical and cultural concerns into account when executing and updating mission requirements. This ICRMP updates the 2009 ICRMP which replaced the cultural resources portion of an Integrated Natural and Cultural Resources Management Plan (INCRMP) prepared in 1997 (SAIC 1997a). The overall goal of the CSSA ICRMP is to ensure the sustained management of cultural resources at CSSA through integrated resource management for multiple uses. Major activities at CSSA include ammunition storage, weapons maintenance and cleaning, weapons testing, and hunting. Given the range of activities, the balanced management of cultural resources at this installation requires an integrated approach, one that ensures optimum use of the resources while supporting CSSA's mission requirements. This ICRMP has been prepared in accordance with Chapter 6 of Army Regulation (AR) 200-1 and Department of Defense (DoD) Instruction 4715.16, all pertaining to cultural resource management and provided in Appendix B.

This ICRMP is organized into the following sections: Section 1 provides an introduction to CSSA, explains the mission and goals of the CSSA cultural resources program, and assigns program responsibilities. Section 2 describes DoD and federal rules and regulations regarding cultural resources management. Section 3 describes the environmental and historical background of the area, efforts to identify cultural resources on the property, known cultural resources at CSSA, and any areas where additional studies may be required. Section 4 provides a management plan for dealing with cultural resource issues at CSSA, and Section 5 outlines standard operating procedures (SOP) for carrying out routine occurrences on or near cultural resources. Appendices include a copy of Chapter 6 of AR 200-1, DoD Instruction 4715.16 (Appendix B), and relevant preservation briefs issued by the National Park Service (NPS) (Appendix C).

1.2 CSSA Overview

CSSA is a U.S. Army installation located in Bexar County, Texas, 19 miles northwest of downtown San Antonio (Figure 1-1). It is a sub-installation of McAlester Army Ammunition Plant. The work currently performed at CSSA consists of:

- Receipt, storage, inventory, pre-delivery inspection, maintenance-in-storage of general supplies, artillery, small arms, and target material; and
- Receipt, storage, issuance, inspection, maintenance, reconditioning, renovating, and demilitarizing of ammunition components and explosives.

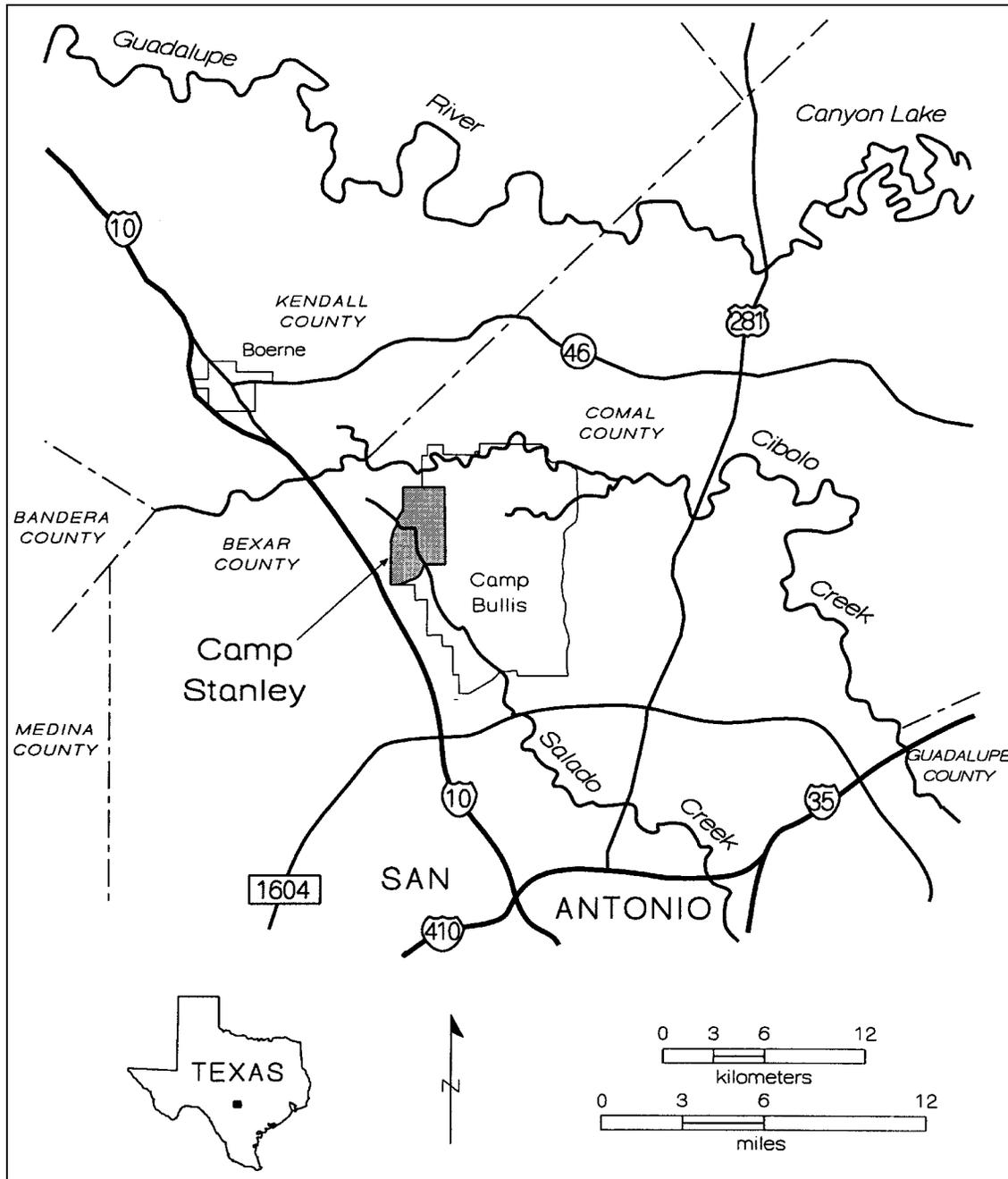


Figure 1-1 Location of CSSA in Bexar County, Texas

CSSA is a restricted-access installation that requires authorization to go on site. Currently, about 130 people work at CSSA, most of whom are present only during normal working hours. During World War II, over 2,000 civilian employees worked at CSSA (SAIC 1997a) and there were a few thousand soldiers at peak times during WWI.

CSSA is composed of approximately 4,004 acres, divided into an Inner and an Outer Cantonment (Figure 1-2). The Inner Cantonment of CSSA, comprising 1,760.18 acres, is used for storage of ammunition; light industrial activities such as maintenance and cleaning of weapons; general storage in warehouses; offices; and hunting and wildlife habitat. The Inner Cantonment area contains all housing, administrative, production, production support, warehousing, storage, and maintenance activities at the installation. This area is bounded by North, East, South, and West Outer Drives. The Outer Cantonment is 2,244 acres. It is used for test ranges, and hunting and is far less developed than the Inner Cantonment.

Since the 1940s, various portions of the north pasture in the Outer Cantonment at CSSA have been used for demilitarization (demil) activities (*e.g.*, munitions burning) and for testing. Currently, the only munitions testing carried out at CSSA is for munitions stored at the installation, and usually only for small ammunition (*i.e.*, grenades and land mines). There is currently no on-site disposal of munitions at CSSA. Explosive Ordnance Disposal (EOD) previously took place at CSSA; however, these activities were discontinued in 1987 (Parsons Engineering Science 1993). Because of increasing urbanization, especially west of CSSA, future demil of large munitions is not planned at the installation. CSSA typically transports unusable munitions to appropriate DoD/Army disposal facilities for evaluation.

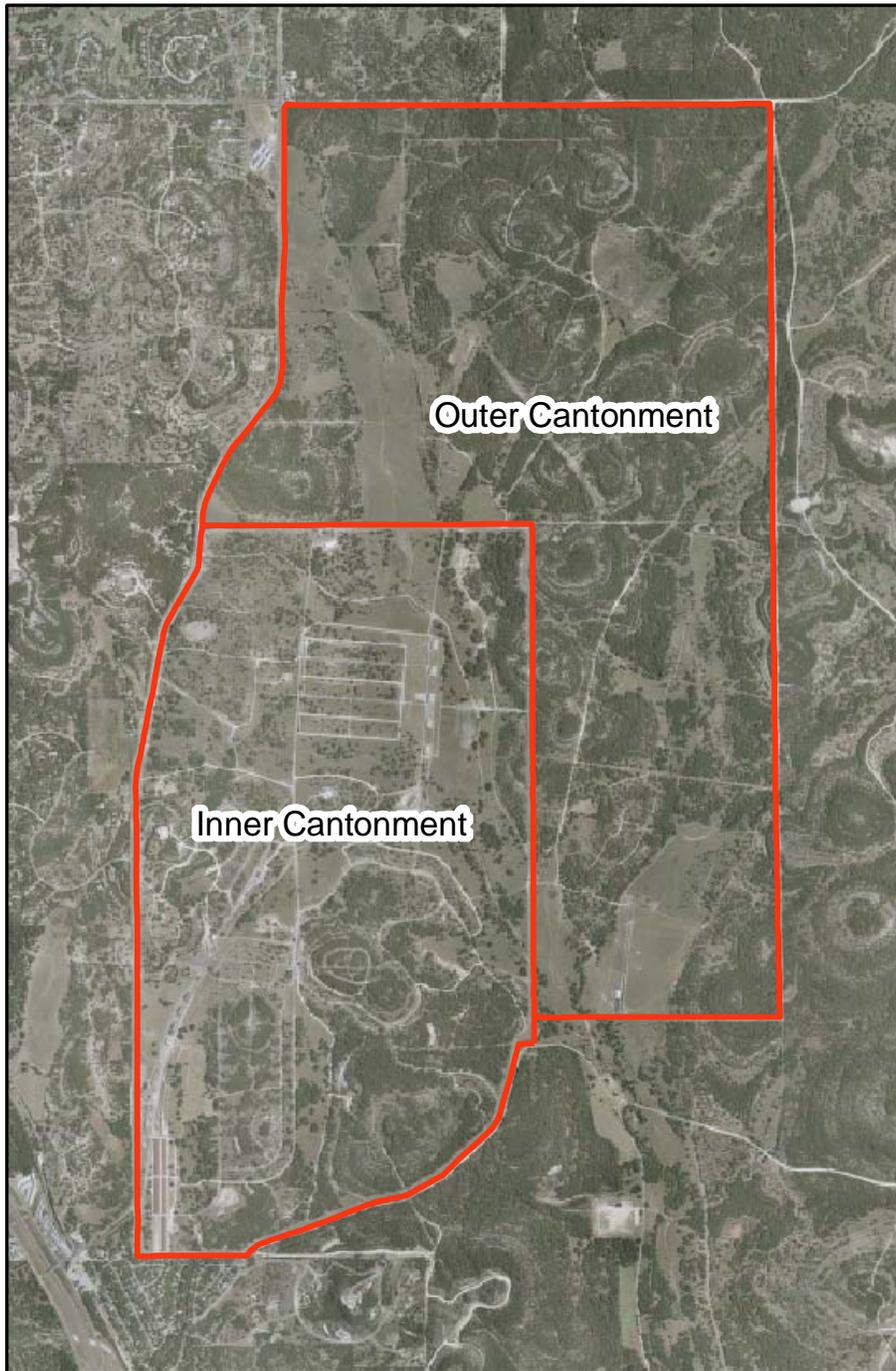
1.3 CSSA Mission

1.3.1 Primary AMC Mission at CSSA

CSSA is a facility of the Army Materiel Command (AMC). The primary mission of the installation is receipt, storage, and issuance of ordnance materiel as well as quality assurance (QA) testing and maintenance of military weapons and ammunition. Operations are relatively small compared to peak historical operations in WWI when several thousand soldiers were at CSSA and WWII when up to 2,000 civilians were working here. From the 1950s on, only approximately 130 Army personnel have been on staff. Management, administration, and functional operation of CSSA are in accordance with AR 740-1 and other applicable regulations, in support of the DoD Military Assistance Program (MAP) mission and other missions as directed by military headquarters (Parsons Engineering Science 1993). Because of its ordnance mission, CSSA is a restricted-access facility. There is no clinic, commissary or dining facility of any kind on the camp, thus not even military retirees can come onto CSSA. At this time, no changes in the mission or military activities at CSSA are anticipated.

Most of the activities related to the primary missions at CSSA are unlikely to have a direct impact on cultural resources. Any future impacts to cultural resources at the installation will come mostly from plans for new construction and from rehabilitation, repair, and maintenance of potentially eligible historic buildings.

Figure 1-2 Camp Stanley Storage Activity

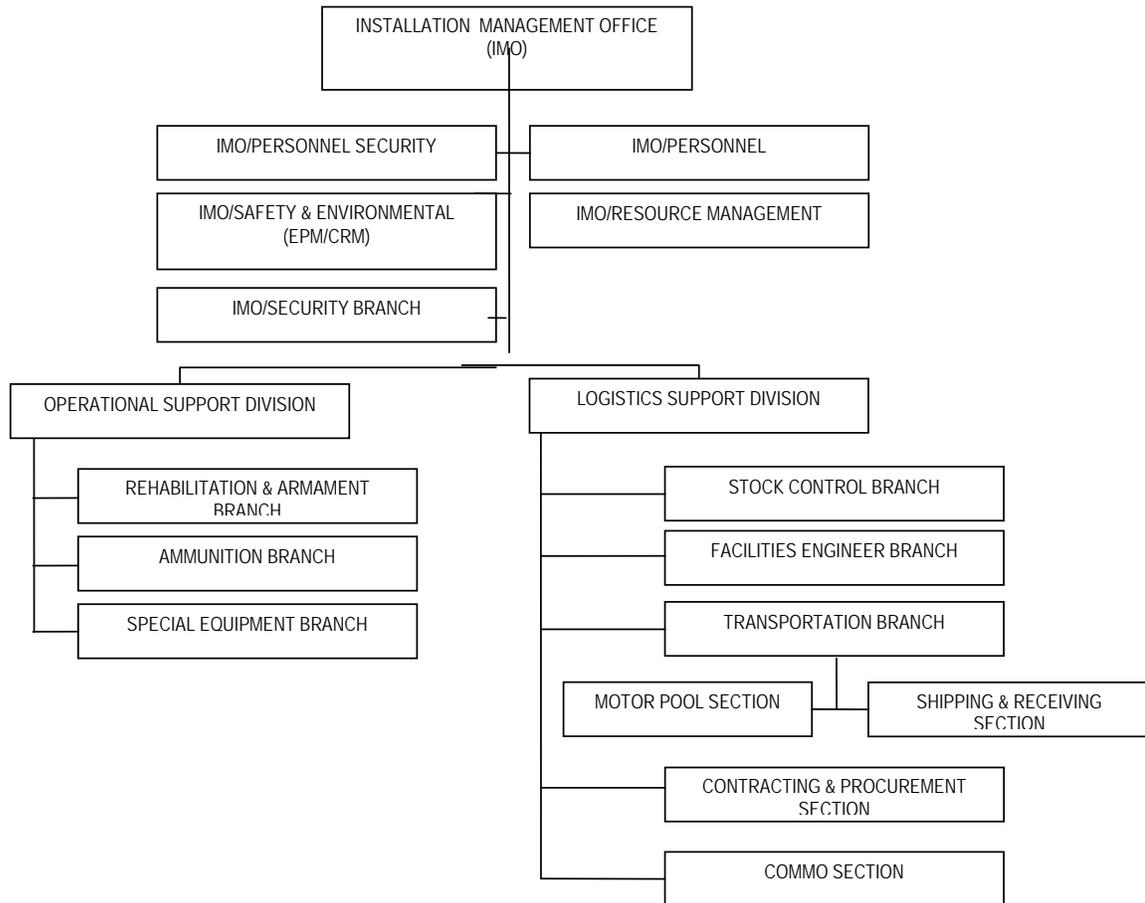


1.3.2 Other Missions at CSSA

In addition to the military mission at CSSA, wildlife management hunting is conducted by current civilian employees and guests of the Installation Manager. The installation's Wildlife Management Committee has developed a Hunting Plan that outlines procedures to be followed by all users and by a safety officer. The goals of the hunting program at CSSA are to support the Installation Manager in keeping deer herds at desired levels and in good health, to provide diverse recreational opportunities to post employees, to maintain an increase vegetational diversity, and to improve the manner in which game is controlled. No major changes or additional missions are anticipated.

1.4 Organization

The organization of CSSA is depicted in Figure 1-3. The following individuals have the responsibility for implementing the Cultural Resources Program on CSSA.

Figure 1-3 Organization of CSSA

1.4.1 Installation Manager

The Installation Manager has the ultimate responsibility for ensuring that CSSA complies with applicable cultural resource laws, regulations, and directives. The Installation Manager has the following listed duties regarding cultural resources.

- Approves and implements the ICRMP.
- Ensures that all projects consider historic preservation early in the planning process by following the internal review process discussed in Section 4.3.
- Ensures that all cultural resources are located, evaluated, and managed in accordance with federal laws and ARs. This responsibility is delegated primarily to the Environmental Program Manager (EPM) at CSSA, who also functions as the Cultural Resources Manager (CRM).
- Ensures that all cultural resources eligible for the National Register, and any other culturally sensitive sites, receive appropriate protection from the CSSA Security Branch, public works, facility engineers, and others.

1.4.2 Cultural Resources Manager

The Environmental Safety Officer is responsible for managing cultural resources at CSSA. The EPM at CSSA functions as the CRM. The CRM has the following listed duties regarding cultural resources.

- Develops, implements, and maintains the ICRMP for the installation.
- Review the ICRMP annually and if required update. The CRM revises the ICRMP every 5 years if necessary or per AR.
- Reviews all work at CSSA to assure compliance with cultural resources regulations.
- Locates, inventories, evaluates, and recommends nomination of eligible properties to the NRHP.
- Ensures that all proposed actions that may affect cultural resources are identified early in the planning process and coordinated with appropriate regulatory authorities.
- Monitors the work of contractors at CSSA to ensure compliance with cultural resource requirements.
- Conducts public awareness and education programs about cultural resources as appropriate.

1.4.3 Security Branch Guards

The Security Branch is responsible for providing protection of cultural resources on CSSA. The Security Chief has the following listed duties regarding cultural resources.

- Investigates any incidents where looting or vandalism to historic properties or archaeological sites has occurred.
- Provides 24-hour security for inadvertently discovered human remains on CSSA while a treatment plan for those remains is developed and implemented.
- Advises the CRM on security procedures for protecting historic properties, if necessary.

1.5 Cultural Resources Management Goals and Objectives

Goals for the CSSA Cultural Resource program are listed below.

- Completion of archival research on four of the potentially eligible archaeological sites so their eligibility for inclusion on the NRHP can be determined (see Table 3-1).
- Completion of inventory and evaluation of unevaluated architectural resources at CSSA that will reach 50 years of age by 2014 (see Table 3-3). This evaluation has been accomplished (see Appendix G) as part of this ICRMP update.
- Creation of a statement on the presence of cultural resources on CSSA, and description of the penalties for damaging, destroying, or disturbing said sites for use at the front gate, to educate all persons entering the facility, including hunters and fishermen (see Appendix E, sample letter from the Installation Management Office [IMO] re: protection of cultural resources).

- Establishment of a program for Native American consultation regarding the cultural resources present at CSSA (see Appendix E, sample letter initiating consultation with Native Americans), if an undertaking is proposed that may affect a cultural resource affiliated with a federally recognized tribe.
- Creation of a program for the CRM to regularly visit NRHP-eligible cultural resources to ensure that their condition has not deteriorated.

SECTION 2 STATUTES AND REGULATIONS

2.1 DoD and Army Policy

Various ARs pertain to the management of cultural resources. Appendix B contains a copy of Chapter 6 of AR 200-1 (Cultural Resources) and DoD Instruction 4715.16 (re: Cultural Resource Management). This and related regulations are summarized in the discussion below, excerpted and updated from the 2009 ICRMP (Parsons 2009).

2.1.1 AR 200-1, Environmental Protection and Enhancement (13 December 2007)

AR 200-1 (U. S. Army 207) prescribes Army responsibilities, policies, and procedures to preserve, protect, and restore the quality of the environment. The primary areas covered include hazardous material and hazardous waste management, water resources, and air quality; however, AR 200-1 also establishes environmental quality goals to protect and conserve natural and cultural resources. Applicable to the management of cultural resources are procedures to ensure early consideration and evaluation of the effects on the environment resulting from any proposed action (as required by the National Environmental Policy Act [NEPA] and further defined in 32 CFR 651, formerly designated as AR 200-2). Programs and activities will be implemented to prevent or minimize those effects to the extent possible.

2.1.2 DoD Instruction 4715.16, Cultural Resources Management (18 September 2008)

The DoD Instruction 4715.16 (DoD 2008) establishes DoD policy and assigns responsibilities to comply with federal requirements for the integrated management of cultural resources on DoD-managed lands. Generally that policy is to manage and maintain cultural resources in a sustainable manner, resulting in sound and responsible stewardship of these resources. The Instruction outlines responsibilities of the Undersecretary and Deputy Undersecretary of Defense for Acquisition, Technology, and Logistics, as well as the Heads of DoD components, regarding cultural resources. The Instruction also provides detailed procedures supporting cultural resource management of each DoD installation, culminating in an updated ICRMP. Enclosure 6 of the Instruction details the contents of an appropriate DoD installation ICRMP.

2.1.3 AR 210-20, Real Property Master Planning for Army Installations (16 May 2005)

AR 210-20 (U.S. Army 2005) defines the real property master planning concept and requirement. It establishes policies, procedures, and responsibilities for implementing the real property master planning process. The Real Property Master Plan (RPMP) is based on the installation's mission and guidance from related planning documents and provides direction for development of the installation. It also establishes a relationship between environmental planning and the RPMP to ensure that environmental consequences of planning decisions are addressed. This regulation also establishes the requirement for complying with environmental documentation procedures.

The specific application of AR 210-20 to cultural resources management includes development of a cultural resources baseline analysis. This presentation provides input to the

discussion of environmental concerns and constraints to development, as well as identification of information gaps to be filled through surveys and studies. An overlay graphically depicts the environmental conditions specified in the narrative. An environmental analysis of effects resulting from implementation of the Capital Investment Strategy (CIS) on cultural resources (and other applicable areas) is designed to assess future impacts early in the planning process. Environmental documentation in support of all components of the RPMP is usually generated on a programmatic level. Among the sources of supporting information to the RPMP listed in AR 210-20 are the Historic Preservation Plan (HPP) and other cultural resources management plans (CRMPs).

2.1.4 Interim Policy for Cold War Era Historic Properties

The Army has developed guidelines for identifying and evaluating Cold War era historic properties (U.S. Army Environmental Center [US AEC] 1997). A series of themes related to the Army's Cold War military-industrial context have been developed. To be considered a Cold War resource, Army guidelines state that the resource should be directly associated with the Cold War (1946-1989) and not merely constructed or developed during that time (US AEC 1997). Cold War resources must also meet one of the NRHP criteria and, to be considered exceptionally important, the Cold War resource must demonstrate national significance. Army guidelines also require that Cold War resource types must be compared to similar types (US AEC 1997).

2.1.5 DoD EA for Program Comments Regarding DoD Historic Property Management

Under a DoD EA, the DoD proposes to deal with whole categories of historic buildings and structures (World War II and Cold War [1939-1974] unaccompanied personnel housing, ammo storage, and ammo production facilities and plants) through requesting Program Comments from the Advisory Council on Historic Preservation (ACHP). This is done to fulfill Section 106 obligations in a programmatic fashion, instead of dealing with roughly 45,000 resources on a case-by-case basis.

The EA on Program Comments deals with DoD Historic Properties Management for all branches of the service (except for ammo production plants, which would only be Army). Under this EA, the DoD proposes to reconcile all further mitigation issues through two means, as listed below.

- Expansion of the historic context already developed by the Army for historic housing, and create historic contexts for historic housing, ammo storage structures, and ammo production plants in the other branches of the military.
- Documentation of a representative sample of one percent of each type of building or structure in each branch of the military.

2.1.6 Interim Policy on Native American Cultural Resources

This statement of policy provides direction for U.S. Army Installation Managers regarding initiating and carrying out consultation with Indian tribes. This consultation is required during the course of compliance with federal regulations governing Native American cultural resources including NHPA, NEPA, AIRFA, ARPA, NAGPRA, and the Memorandum on the Distribution of Eagle Feathers. Consultation is undertaken by the Installation Manager when required by

federal law and regulation. Discourse between the Department of the Army and an Indian tribe are on a government-to-government basis.

2.2 Federal Laws and Regulations

2.2.1 National Environmental Policy Act

NEPA (Public Law 91-190, 42 U.S. Code [USC] § 4321), as amended and promulgated at 40 CFR (parts 1500-1508), requires federal agencies to take the environmental consequences of proposed actions into consideration during the decision-making process. The intent of NEPA is to protect, restore, or enhance the environment through informed federal decisions. The CEQ was established under NEPA to implement and oversee federal policy in this process.

2.2.2 National Historic Preservation Act of 1966

The primary law governing cultural resources is the NHPA, 16 USC 470-470mm. This act established the NRHP and the ACHP.

Section 106 of the NHPA requires that federal agencies consult with the ACHP prior to any undertaking that would affect a property listed on, or eligible for, inclusion on the NRHP. Since Section 106 compliance is usually in response to a proposed action that has the potential to affect historic properties, consultation with the State Historic Preservation Officer (SHPO), interested parties, and the ACHP is required.

Generally, CSSA may comply with Section 106 by using a five-step process:

- Identify the Area of Potential Effects (APE), in consultation with SHPO;
- Identify historic properties, in consultation with SHPO;
- Assess effects, in consultation with SHPO
- Notify; consult with interested parties and ACHP as needed
- Resolution of any adverse effects, in consultation with SHPO, ACHP and consulting parties.

According to 36 CFR 800, historic properties are buildings, structures, districts, sites or objects that are either listed on the NRHP, or eligible for listing on the NRHP.

Criteria used to determine NRHP eligibility for historic properties are listed in 36 CFR 60.4. To be eligible, a cultural resource must retain its integrity; *e.g.*, the authenticity of its historic identity, evidenced by the survival of physical characteristics that existed during the property's historic or prehistoric period. In addition to having integrity, to be eligible for the NRHP, cultural properties must meet one of the following criteria:

- Association with events that have made a significant contribution to the broad patterns of history;
- Association with the lives of persons significant in the past;
- Embody the distinctive characteristics of a type, period, or method of construction; or represent the work of a master; or possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction; or

- Yield or may be likely to yield information important in prehistory and history.

A traditional cultural property (TCP) can be eligible for inclusion in the NRHP because of its association with cultural practices or beliefs of a living community that are rooted in the community's history and are important in maintaining the continuing cultural identity of the community.

In general, an undertaking affects a historic property when it alters the property's characteristics, including relevant features of its environment or use that qualify it as significant according to NRHP criteria. An undertaking is considered to have an adverse effect when it may diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association.

Adverse effects may include, but are not limited to:

- Physical destruction, damage, or alteration of all or part of the resource;
- Isolation of the property from, or alteration of the character of the property's setting when that character contributes to the resource's qualification for the NRHP;
- Introduction of visual, audible, or atmospheric elements that are out of character with the property or alter its setting;
- Neglect of a property resulting in its deterioration or destruction; or
- Transfer, lease, or sale of the property.

Section 110 of the NHPA requires that federal agencies, such as the Army, inventory, evaluate, and protect historic properties under their jurisdiction. Under this section, the heads of federal agencies are responsible for preservation of cultural properties owned or controlled by their agency. These responsibilities involve identifying, evaluating and nominating such properties to the NRHP; using and preserving the properties; cooperating with federal and state agencies and others in this process; and maintaining permanent storage of the installation's historic records.

Section 111 of the NHPA specifies that after consultation with the SHPO and the ACHP, agencies may lease historic properties or exchange them for comparable historic properties as long as the preservation of the property is assured. Lease fees may be used to defray the costs of maintaining the property. CSSA may enter into such a contract after consulting with the SHPO and the ACHP.

2.2.3 Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines

The Secretary of the Interior's Standards and Guidelines (Federal Regulation [FR] 44716 1983) provide technical advice about archaeological and historic preservation procedures that may be used during the process of compliance with the federal laws and regulations governing cultural resources. The guidelines are not regulatory, but offer assistance and standards for preservation planning, including resource identification, evaluation, registration, historical documentation, documentation of architectural and engineering features, archaeological documentation, and historic preservation. Standards for identification address development of research designs, archival research, field survey, sampling, and reporting of the results. The standards for architectural and engineering documentation concern procedures for

documenting historical structures and engineering features. The Secretary of the Interior also has issued Standards and Guidelines (Federal Regulation on treatments, Preservation, Rehabilitation, Restoration, and Reconstruction). The treatment Standards, developed in 1992, were codified as 36 CFR Part 68 in the July 12, 1995 *Federal Register* (Vol. 60, No. 133).

2.2.4 Archaeological Resources Protection Act

ARPA, 16 USC 470aa-47011, requires that archaeological resources on public and Indian lands be protected. Protection of archaeological resources at CSSA, under the guidelines of this act, includes consideration of excavation and removal of resources, enforcement of the act, and confidentiality of information concerning the nature and location of archaeological resources.

Compliance with ARPA by CSSA is listed below:

- Directing persons wishing to undertake the excavation or removal of any archaeological resources from its lands to obtain an ARPA permit from the CRM who will ensure that they are qualified applicants. These archaeological resources will remain the property of the U.S. and will be preserved in a suitable museum or institution.
- Notifying Indian tribes, in advance, of possible harm to those sites with religious or cultural importance.

Section 16 USC 470ee-ff of ARPA, prohibits the unauthorized removal of, or damage to, archaeological resources, and trafficking in archaeological resources. It provides civil and criminal penalties for these acts. The Installation Manager at CSSA will ensure that the security personnel, installation legal staff, and resource management staff are familiar with the requirements and applicable civil and criminal penalties under ARPA (AR 200-1, 6-4.b.(1)).

Under ARPA, information on the nature and location of archaeological resources shall not be made available to the public.

2.2.5 EO 11593, Protection and Enhancement of the Cultural Environment

EO 11593, Protection and Enhancement of the Cultural Environment, 3 CFR 154 (1971), directs federal agencies to administer cultural properties under their control and to direct their programs and policies in such a way that the cultural resources under their control are preserved, restored, and maintained. Compliance with this order can generally be accomplished through compliance with Sections 106 and 110 of the NHPA.

2.2.6 36 CFR Part 800, Protection of Historic Properties

Protection of Historic and Cultural Properties, 36 CFR Part 800 (1986), provides an explicit set of procedures for federal agencies to meet their obligations under Section 106 of NHPA.

2.2.7 American Indian Religious Freedom Act

AIRFA, 42 USC § 1996, states that:

“...it is the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express, and exercise the traditional religions[...], including, but not limited to, access to sites, use and possession of sacred objects, and the freedom to worship through ceremonial and traditional rites.”

Installations are encouraged to make a good faith effort to learn about Indian religious practices, and are required to consult with Indian leaders and religious practitioners and consider any adverse impacts on Indian religious practices during decision-making. There are no specific regulations implementing AIRFA.

AIRFA addresses intangible, religious, ceremonial, or traditional values and concerns not tied to specific cultural properties. Those tied to tangible cultural properties are also addressed under the NHPA. Additional information on Native American traditional resources and how to protect them can be found in National Register Bulletin 38 (Parker and King 1990).

Measures for compliance with AIRFA are still under discussion among SHPOs, agencies, and Indian groups. The following listed procedures allow CSSA to comply with AIRFA during the course of Section 106 consultation.

- Establish contact with interested American Indian groups during the regular course of the Section 106 process (36 CFR 800.1 iii) (see Sections 7.3.3 and 8.3.6).
- Conduct regular field inventory to locate all historic properties in accordance with Section 106 compliance.

2.2.8 EO 13007, Indian Sacred Sites

EO 13007, Indian Sacred Sites (May 24, 1996) directs federal agencies to accommodate access to, and ceremonial use of, Indian sacred sites by Indian religious practitioners, and to avoid adversely affecting the physical integrity of such sites. Sacred sites are discrete locations that have been identified by an Indian tribe or individual as sacred to an Indian religion. It is the obligation of the tribe or authoritative representative of an Indian religion to inform the agency of the existence of such a site.

If an Indian sacred site is identified by a federally recognized tribe or representative of an Indian religion, the Installation Manager enters into consultation with that group regarding how access to and use of the sacred site can be provided, and how adverse physical effects can be avoided. Such accommodations are made to the extent practicable, permitted by law, and not clearly inconsistent with Army functions.

No Indian sacred sites have been identified at CSSA.

2.2.9 EO 13175, Consultation and Coordination with Indian Tribal Governments (November 2000)

EO 13175, Consultation and Coordination with Indian Tribal Governments, supersedes EO 13084. Section 2 of EO 13175 directs in part that, "In formulating policies that have tribal implications,

- Agencies shall respect Indian tribal self-government and sovereignty, honor tribal treaty and other rights, and strive to meet the responsibilities that arise from the unique legal relationship between the federal government and Indian tribal governments.
- With respect to federal statutes and regulations administered by Indian tribal governments, the federal government shall grant Indian tribal governments the maximum administrative discretion possible.

- When undertaking to formulate and implement policies that have tribal implications, agencies shall:
 1. Encourage Indian tribes to develop their own policies to achieve program objectives;
 2. Where possible, defer to Indian tribes to establish standards; and
 3. In determining whether to establish federal standards, consult with tribal officials as to the need for federal standards and any alternatives that would limit the scope of federal standards or otherwise preserve the prerogatives and authority of Indian tribes.

The EO further states in Section 5 that,

“Each agency shall have an accountable process to ensure meaningful and timely input by tribal officials in the development of regulatory policies that have tribal implications. Within 30 days after the effective date of this order, the head of each agency shall designate an official with principal responsibility for the agency’s implementation of this order. Within 60 days of the effective date of this order, the designated official shall submit to the Office of Management and Budget (OMB) a description of the agency’s consultation process.”

CSSA is advised to seek HQDA (AEC) review of all formal agreements between CSSA and American Indian tribes for the purposes of ensuring compliance with this EO. A sample letter for initiating consultation with Native American groups is included in Appendix E.

2.2.10 Memorandum: Policy Concerning Eagle Feathers for Native American Religious Purposes

This Memorandum for Heads of Executive Departments and Agencies (April 29, 1994) addresses steps for improvement in the collection and transfer of eagle carcasses and body parts for Native American religious use. Salvageable eagle carcasses found on CSSA should be sent to the U.S. Fish and Wildlife Service (USFWS), Federal Eagle Repository in Ashland, Oregon.

2.2.11 Memorandum: Government-to-Government Relations with Native American Tribal Governments

This memorandum (April 29, 1994) indicates that consultation between federal agencies and federally recognized Indian tribes is to occur on a government-to-government basis. Installation Commanders/Managers will consult with the designated representatives of these tribes as representatives of a government.

To implement the Government-to-Government memorandum, the CSSA Installation Manager should:

- Afford tribal leaders the same respect as any head of state;
- Coordinate compliance activities through the head of the tribal government;
- Consult with the appropriate head of the federally recognized tribal government before taking actions that could impact cultural resources of importance to a tribe; and
- Apply the requirements of EO 12875, Enhancing the Intergovernmental Partnership, and EO 12866, Regulatory Planning and Review, to design solutions and tailor

federal programs, when necessary, to the specific and unique needs of tribal communities.

For day-to-day activities, CSSA staff may interact with tribal representatives and tribal staff members, but these actions do not constitute official government-to-government interaction. The CSSA Installation Manager represents the United States in the government-to-government relationship with the head of the tribal government. Many American Indian tribes have developed their own internal regulations, ordinances, resolutions, and protocols for handling government-to-government relations and issues covered under specific federal cultural resource legislation. Such regulations and procedures may describe the relative authority of various tribal representatives, departments, or committees, as well as a process for consultation and preferred methods of resolving issues. The CSSA Installation Manager should request such information when first establishing a consultation relationship.

2.2.12 Memorandum: Tribal Consultation

This memorandum (November 5, 2009), requires a plan and annual reporting by heads of agencies on implementation of Executive Order 13175 of November 6, 2000 which requires consultation between federal agencies and federally recognized Indian tribes to occur on a government-to-government basis.

2.2.13 Native American Graves Protection and Repatriation Act

NAGPRA, 25 USC §3001-3013, protects ownership and control of Native American human remains and related cultural items excavated or discovered on federal lands. Discovery of human remains and related cultural items on CSSA would require implementing the following procedures (43 CFR 10.4 a-d):

- Stop project work in the area of the discovery immediately and make a reasonable effort to protect the discovery;
- Notify the appropriate Native American group(s); and
- Follow the requirements of Section 106 of the NHPA and NAGPRA for excavation and disposition of the remains.

Native American human remains and related objects can be excavated and removed only under a permit issued under Section 4 of ARPA after consultation with the appropriate Indian tribe. Permits for such excavations are issued by the U.S. Army Corps of Engineers (USACE) District Real Estate Office only after consultation with appropriate Native Americans. Native American groups with historic ties to the CSSA region are discussed in Section 4.7.

NAGPRA also requires a 30-day delay period, following certification of official notification of the discovery, before project work resumes in the area of discovery. Work may resume earlier if consultation and agreement occur. Final rule on application of NAGPRA is provided in 43 CFR Part 10, December 1995.

At this time, no human skeletal remains have been found at CSSA, and none are expected to be found.

2.2.14 Protection of Archaeological Resources: Uniform Regulations

Protection of Archaeological Resources: Uniform Regulations (32 CFR 229) implements provisions of ARPA by providing uniform procedures to be followed by all federal land managers to protect archaeological resources located on public lands. Federal land managers carry out protection procedures by issuing permits authorizing excavation and removal of archaeological resources; pursuing civil penalties for unauthorized excavation or removal; preserving archaeological collections and data; and ensuring the confidentiality of information about archaeological resources. All procedures are carried out with consideration for the provisions of AIRFA.

2.2.15 Curation of Federally Owned Archaeological Collections (36 CFR 79)

This regulation establishes procedures to be followed by federal agencies to preserve collections of prehistoric and historic material remains and associated records recovered under authority of the Antiquities Act (16 USC §431-433), Section 110 of the NHPA, and ARPA.

Such collections may include, but are not limited to:

- Components of structures and features;
- Artifacts of human manufacture such as tools, containers, and clothing;
- Natural objects used by humans such as rocks, feathers, or bones;
- Waste products and organic materials associated with human activities;
- Human remains;
- Symbolic or artistic works such as petroglyphs and pictographs;
- Environmental specimens used for dating or interpreting human activity such as pollen, seeds, shell, and soil samples; and
- Paleontological specimens found in association with human activities.

Collections may also include the original records, documents and photographs associated with the recovery and analysis of the prehistoric or historic resources.

Federal agencies are responsible for the long-term management and preservation of existing and new collections by arranging for their deposit in a repository with adequate long-term curation capabilities as described in Section 79.9 of the Antiquities Act. The agency arranges for this curation by entering into a contract, a MOA, or an interagency agreement with a curation facility such as a museum, archaeological center, university, federal or state agency, or Indian tribe. Assistance in arranging for a curation agreement and evaluating a repository is available from the Army's Federal Historic Preservation Officer, the SHPO, the Texas State Archaeologist, or the NPS (See Section 4.8 for Points of Contact).

SECTION 3 PLANNING LEVEL SURVEY AND CULTURAL RESOURCES INVENTORY

3.1 Planning Level Survey

The planning level survey (PLS) at CSSA uses the cultural landscape approach and incorporates available spatial data on cultural resources with the information on the natural environment making up the landscape in the region. These data provide the basis for understanding the cultural resources environment of CSSA.

This section describes the environmental setting of the installation, the prehistoric and historic background, or contexts, of the area, previous archaeological and architectural survey, and elements of the archaeological site predictive model. It also outlines an inventory of the cultural resources, including prehistoric and historic archaeological sites, and architectural resources.

This section is meant to be used as a planning and management tool. It provides a brief baseline from which readers and/or users of the document can associate cultural materials identified at the installation. For additional details, a large body of literature is cited in the document and/or found in the bibliography provided in Appendix A, and sources available at the CSSA on-line **Environmental Encyclopedia** (CSSA 2007).

3.1.1 Site Environmental Setting

CSSA is located in the south-central part of Texas on the Balcones escarpment, in the region known as the Central Texas Plateau-Prairie (Black 1989). This area is in the Kansan Biotic province. Northwest of the installation, the terrain slopes upward to the Edwards Plateau; to the southeast, the terrain slopes downward to the Gulf Coastal Plains. CSSA is located in northwestern Bexar County about 19 miles northwest of downtown San Antonio. The installation is immediately east of State Highway 3351, and approximately 0.5 mile east of Interstate Highway 10. Camp Bullis borders CSSA on the east and south. The land on which CSSA is located was used for ranching and agriculture until the 1900s (Manguso 1990). Further details on soil, geology and biology relevant to cultural occupation, can be found in the Environmental Encyclopedia (CSSA 2007).

3.1.2 Cultural Background

3.1.2.1 Regional Prehistory

CSSA is located in the Central Texas Plateau-Prairie, a subdivision of the Central Texas archaeological region (Black 1989; Mercado-Allinger 1996). The following prehistoric background uses four basic developmental stages for central Texas: Paleoindian, Archaic, Late Prehistoric and Historic (Hester 1980). The Archaic is further divided into three substages, Early, Middle, and Late, and the Late Prehistoric is subdivided into two phases, the Toyah and Austin.

The Paleoindian period in Texas is generally dated from about 9200-6000 B.C. Paleoindians crafted finely-made, distinctive stone tool assemblages that were used over broad geographic areas. In Texas, the earliest well-dated diagnostic Paleoindian stone projectile points are Clovis

and Folsom, both fluted forms, and Plainview, an unfluted form. Later Paleoindian points are Angostura, Golondrina, Scottsbluff, and Meserve types, which are lanceolate and transitional to later, Archaic stemmed types (Black 1989). Clovis and Folsom points are traditionally associated with extinct large mammals, including mammoth, mastodon, camel, horse, and bison; however, recent investigations indicate that Paleoindians subsisted on a wide variety of resources, including many types of plant food, shellfish, nuts, and other resources (Black 1989; Scott, Kibler, Freeman, and Austin 1998).

The transition between the Paleoindian period and the Early Archaic was gradual, coinciding with a warming trend and the extinction of many species of large mammals. The Early Archaic lasted from about 6000-3000 B.C. This period is marked by profound social and economic changes as people adapted to the changing environment following the end of the Pleistocene (Black 1989). Artifact distributions indicate that groups were highly mobile, utilizing a wide variety of resources, and had a low population density (Black 1989; Scott, Kibler, Freeman, and Austin 1998). The use of the Angostura point continued through the Paleoindian to Archaic transition, but new forms were added, including Early Split-stem and Martin-Uvalde points. A wide variety of bifacially and unifacially-worked stone tools were also used, as were manos, metates, and rock hearths and ovens (Scott, Kibler, Freeman, and Austin 1998).

The Middle Archaic period lasted from approximately 3000-1000 B.C. Population probably increased at this time, since sites from this time period are more common than those of earlier periods. The Middle Archaic period in central Texas is virtually defined by the presence of a single specialized site type, the burned rock midden and its associated artifact styles. The burned rock features appear to represent intensive food-procurement strategies, perhaps associated with acorn processing (Black 1989) or roots/tubers (Scott, Kibler, Freeman, and Austin 1998). Middle Archaic artifact assemblages are characterized by three successive groups of points, the Bell-Andice-Calf Creek interval, followed by the Taylor interval, and finally the Nolan-Travis interval (Scott, Kibler, Freeman, and Austin 1998). The changes in points may also reflect the movement of people, as groups shifted territory in response to various outside pressures.

The Late Archaic in central Texas is generally dated from about 1000 B.C. –A.D. 800. The Late Archaic populations were larger, and site density increased, especially at the very end of the Late Archaic (or Terminal Archaic) period. The earliest part of this period is marked by use of Montell, Castroville, and Marcos triangular dart points, giving way to later Ensor, Frio, Darl, and Fairland expanding stem dart points (Black 1989). The use of burned rock middens continued, and cemeteries along drainages were used.

The Late Prehistoric period dates from about A.D. 800-1600, and is generally divided into earlier and later phases, the Austin, and Toyah, respectively. In central Texas, the Austin Phase (circa A.D. 800-1300) is marked by evidence for introduction of the bow-and-arrow. Small triangular projectile points used as arrowheads appeared suddenly, and spread rapidly. The trend of increasing regionalism seems to decrease during the Austin Phase, which is marked by similar and widespread material traits, including Scallorn and Edwards points. The Toyah Phase in central Texas (circa after A.D. 1300) is marked by the appearance and spread of ceramics, and the presence of Perdiz points. Markedly different subsistence strategies and settlement patterns were employed at this time. Evidence for at least limited use of horticulture is found. Bison remains are frequently found in Toyah Phase sites, although deer were also a significant resource (Black 1989). The Late Prehistoric period ends arbitrarily at European contact, although

traditional lifeways continued until well after this time. The introduction of new plants, animals (especially the horse), pathogens, tools, ornaments, and other European items had profound impacts on native societies that only increased with time.

3.1.2.2 Regional History and Settlement

Native Americans

The central Texas area was not historically documented until the late 17th century (Vehik 2001). Native Americans escaping Spanish pressure in Mexico entered the area from the south, and nomadic raiding groups (Apaches and Comanches) moved into the area from the west and north, causing the Native American inhabitants at the time, the Coahuiltecan, to flee elsewhere. The term “Coahuiltecan” is used to refer to any of the many (100+) small bands or tribes that inhabited southwest and central Texas; they were mobile foragers who spoke numerous languages, and were never a cohesive organization (Newcomb and Campbell 2001). Coahuiltecan left the area or abandoned their distinctive lifeways before many of the groups were documented, so it is difficult to correlate the archaeological remains with any specific historic band (Black 1989). Some of the surviving Coahuiltecan took refuge in the Spanish Missions around San Antonio and converted to the Catholic religion. They married other Catholics, primarily Spaniards and Mexicans, and were integrated into Texas Hispanic society; their descendents remain in Texas today.

Four other Native American tribes are known to have lived in the central Texas region historically: the Tonkawa, the Lipan Apache, the Mescalero Apache, and the Comanche. Tonkawans lived in central Texas in the 18th and 19th centuries (Black 1989); however, there is evidence they moved there from northern Oklahoma in the 18th century to escape marauding Apaches (Newcomb and Campbell 2001). Following the 19th century Indian wars, the Tonkawans moved back to Oklahoma, where they remain today.

The Comanche are related to Shoshonean-speaking peoples of the Great Basin who moved onto the northern Plains in the 1500s (Kavanagh 2001; Lipscomb 2004). The Comanche are not mentioned in historical documents until 1706, but once they acquired horses they became highly mobile warriors and traders, and dominated life on the Southern Plains into the 19th century. They moved freely throughout central and southern Texas, including the CSSA area, but probably did not settle in one place for long.

The Lipan Apache migrated to Texas from the Northern Plains and settled in southern and central Texas by the second half of the 17th century, where they hunted bison, made pottery, and practiced horticulture (Opler 2001). The Lipan Apache are related to six other Apachean groups of the Southwest and Plains, but were a separate tribe for over 225 years (Opler 2001). They were forced southward by pressure from raiding Comanches. By 1873, the remaining Lipan Apache, stressed from warfare with the Spanish, other tribes, and later Anglo-American settlers, were driven across the Rio Grande River into Mexico. Only remnants of the population survived U.S. military raids into Mexico, some by escaping to live with the Tonkawa, where they were gradually absorbed, while others moved to the Mescalero Apache Reservation in New Mexico in 1903 where their descendents remain today (Opler 2001). Additionally, some had sought refuge in the Spanish Mission in the 18th century, and had become Catholic, and no longer followed traditional Lipan Apache lifeways.

The Mescalero Apache lived primarily west of the CSSA area, centered in what is now southwest New Mexico, but roamed and hunted a broad territory that included areas to the east and south into Mexico (Opler 1983). The Mescalero Apache were primarily nomadic hunters and foragers, and moved onto the Plains to hunt buffalo, and into the mountains to pursue antelope, elk, and bighorn. After years of being at war with other tribes, and variously being in between the Spaniards, Mexicans, Texans, Americans, the Union, and the Confederacy, the Mescalero were assigned to a reservation within their original homelands in southwestern New Mexico in 1873. While the Mescalero Apache reservation today predominately uses a form of the Mescalero Apache language, it also houses numerous Chiricahua and Lipan Apaches, and all three groups have intermarried extensively and all share the tribal affiliation of Mescalero Apache (Opler 1983).

Euro-American Exploration and Settlement

Spanish exploration of Texas began in 1519 when the Gulf Coast was mapped by Alonso Álvarez de Pineda, with other explorers quickly following. Texas was part of the Spanish province of New Spain for almost 300 years, until it became part of the Mexican Republic following Mexican Independence in 1821.

Spanish settlement in central Texas began relatively late. It was not until the 1700s that the Spanish established Franciscan missions in Bexar County to Christianize the native Indian populations. In 1718, the mission of San Antonio de Valero (the Alamo) and the San Antonio de Bexar Presidio, at what is now San Antonio, were founded. Other missions in the area were founded between 1718-1731, including Nuestra Señora de la Purísima Concepción, San José y San Miguel de Aguayo, San Francisco de la Espada, and San Juan Capistrano (Wright 2004). Bexar County continued to be sparsely populated into the 1770s, with most settlement centered around San Antonio. Native Americans in the Bexar County area at this time included the Lipan Apache and the Comanche. The Tonkawa would move into the area later in the century.

Bexar County was the Bexar subdivision of the Mexican political department of Texas, and extended from the Rio Grande to the Texas Panhandle and to El Paso in the west. During the early 19th century, most settlement in the Bexar region continued to be centered around San Antonio. Cattle ranching, which had been established by the Spaniards, was already an important industry in Bexar County at this time.

In an attempt to increase settlement in the region between San Antonio and Nacogdoches to the east, the Mexican government granted a series of *empresario* contracts to men who promised to bring settlers to populate a given area or province. Most of the settlers thus recruited came from the United States and Europe (Gerstle, *et al.* 1978). Many of the Anglo-American settlers were planters and frontiersmen from the southern states of Louisiana, Alabama, Arkansas, Tennessee, and Missouri. They acquired farmland along major river valleys in the eastern part of Texas and established cotton plantations using slave labor (Gerstle, *et al.* 1978). The European settlers emigrated from Germany, France, Czechoslovakia, Poland, and Norway. The German immigrants had the greatest influence on the rural culture of central and southwestern Texas. They established independent farms, ranched cattle, and planted diverse crops, which did not require slave labor (Gerstle, *et al.* 1978).

Texas became a free republic in 1836 following the defeat of Mexican forces at San Jacinto. Another wave of Anglo-American and European immigrants arrived in Texas at this time,

primarily because of the vast amount of open land available. In December 1837, the Republic of Texas enacted a General Land Act in order to parcel out the land by dispensing headright grants. First-Class grants were given to any man (except Africans and Indians) who had arrived in Texas before the signing of the Texas Declaration of Independence in March 1836. Married men were entitled to one league (4,423.4 acres) and one labor (177.1 acres); single men received one-third of a league (1,476.1 acres). Second-class certificates for 1,280 acres were granted to those who had arrived before October 1, 1837. Later arrivals received smaller portions of land (Lang and Long 2004).

Settlement of the CSSA Area

The land that became CSSA was part of several acquisitions made by Nathaniel Lewis between 1838 and 1847 (Boyd, *et al.* 1990). Lewis was born in Falmouth, Massachusetts in 1806 and arrived penniless in Texas around 1830. He became a successful merchant and owned large tracts of land throughout the state. Lewis began ranching land in the area soon after his purchase. The main ranch on his property was located east of CSSA, between the floodplains of Salado and Panther Springs creeks. It is unlikely, however, that he ever lived there because his home was located in San Antonio. The 1848 tax rolls indicate that he owned 647,008 acres, 84 slaves, 252 horses, and 4,077 cattle, with a total value of \$306,266 (Boyd, *et al.* 1990).

In 1847, Lewis sold 2,577 acres of his land located on the floodplain of Salado Creek to John Meusebach. Meusebach, a well-educated German immigrant and son of a baron, served as the commissioner-general of the Society for the Protection of German Emigrants to Texas (Smith and Tetzlaff 2004). He and a group of German immigrants negotiated a treaty with the Comanche which allowed the immigrants to settle in the area without fear of reprisals. Meusebach sold this land to Henry Habermann in October 1853, but remained there with his family until about 1860, where he was primarily engaged in agriculture (Boyd, *et al.* 1990). The 1856 tax rolls indicate that Meusebach owned three horses, 35 cattle, and 500 hogs. Meusebach married in 1852, and probably constructed the two-story stone house at Comanche Spring (Site 41BX420) at this time, which is located just outside the southeast boundary of CSSA. In 1860, he gave up farming and moved his family to Fredericksburg, Texas and began a mercantile business (Boyd, *et al.* 1990; Smith and Tetzlaff 2004).

Habermann bought additional property from Nathaniel Lewis in 1862 adjacent to his Meusebach purchase. He then owned a total of 9,224 acres, and the 1862 tax rolls indicate he had 300 cattle. In 1881, Habermann sold the 9,224 acre property to his friend, Conrad Schasse. Schasse was a druggist who resided in San Antonio but also operated a cattle ranch on the Comanche Spring property. In 1906, Schasse sold 4,877 acres of this land to the United States Government; this parcel constitutes most of the southern portion of CSSA. The northern portion of CSSA was acquired by the U.S. Government through purchase or condemnation in 1941 (De Vore 1995).

3.1.2.3 CSSA Military History

The following CSSA Military History is excerpted from *Archeological Survey at Camp Stanley Storage Activity, Bexar County, Texas* (Kibler, *et al.* 1998).

United States military activity in the Leon Springs area began in 1906 and 1907 with the purchase of 17,273.87 acres from all of or parts of six ranches (Freeman 1994a:9). This area was

designated the Leon Springs Military Reservation and was to be used as a maneuvers and training area for troops based at Fort Sam Houston in San Antonio. Leon Springs was praised for its sparse population and varied terrain (Manguso 1990:5). Use of the new training area started almost immediately. In July and August of 1907, the small arms range was used for the Southwestern Rifle and Pistol Competition. The first major maneuvers were held in 1908 involving Regular Army and National Guard Infantry, Cavalry, and Artillery (Manguso 1990:11). The Leon Springs Military Reservation continued to grow in importance in the years before World War I. With increased tensions along the United States-Mexico border between 1910 and 1917, the reservation was increasingly used for maneuvers and training. In 1916, a large remount station was built near Anderson Hill (Manguso 1990:21). In February of 1917, the facilities at the reservation were renamed Camp Funston in honor of Major General Frederick Funston. To avoid confusion with another base of the same name, in October the camp was renamed Camp Stanley in honor of Brigadier General David Sloan Stanley, former commander of the Department of Texas (Manguso 1990:23). With the American entry into World War I, the facilities at Camp Stanley grew dramatically. In May of 1917, the First Officers Training Camp was established north of Anderson Hill “in a tent and temporary building cantonment” (Manguso 1990:23) to train junior officers for the 90th Division forming in San Antonio. In July and August, these troops conducted trench warfare training to the east of Anderson Hill. Also constructed at this time was a Signal Corps branch school in the northwest corner of Camp Stanley (Manguso 1990:23–24). The northwest area of the camp was also used for cavalry units, and there was a Quartermaster area just north of the officer training cantonment. Both of these areas were connected by a rail line running into the camp from Camp Bullis to the south.

With the downsizing of the military after World War I, many of the structures at Camp Stanley seem to have been abandoned or removed. It was also during this time that Camp Stanley began the second phase of its existence. In 1920 the northern half of the camp was given over to the Ordnance Section of the Eighth Corps Area for the storage of large stocks of surplus ammunition, despite the lack of suitable structures for this storage. In 1925 the storage area was taken over by the San Antonio Arsenal, and plans were started to create a proper storage facility. This plan was not fully implemented until 1938. That year, Works Progress Administration (WPA) workers began excavation and construction of the igloos and magazines in the southern part of the camp (Manguso 1990:47).

During the period between World Wars I and II, Camp Stanley and Camp Bullis hosted a number of military activities, as well as two unusual civilian activities. In 1926, two movies—*The Rough Riders* and *Wings*—were filmed at the bases. *Wings* made use of the old training trenches to the east of Anderson Hill as movie sets and was later the winner of the first Academy of Motion Pictures award for Best Picture in 1927. As the United States entered World War II, the army decided to enlarge Camp Stanley and Camp Bullis, and land to the north of Camp Stanley was acquired by condemnation in 1942. The condemned land included six tracts that would later make up the northern part of Camp Stanley’s Outer Cantonment (Freeman 1994a:65; Rogers, *et al.* 1940). Three of these tracts contained known ranch complexes previously belonging to Andrew Blank, Louis Willke (Wilkie), and O. Scharmann; all three show on the 1925 map of Camp Stanley. During World War II, what is now the Outer Cantonment of Camp Stanley was part of Camp Bullis and used for training. The most evident example of this occurs around the old rifle range, which was being used as an antitank gunnery range with moving targets. In 1943, army combat engineers built a fortified combat training area to the east of the

range (Manguso 1990:81). Also during this time, many of the farms on the camp property either were salvaged or used by range wardens who patrolled the perimeter of the camp (Petsch 1942). Camp Stanley continues to be a major munitions storage and research facility. The only major change since World War II has been the transfer of the Outer Cantonment area from Camp Bullis to Camp Stanley in 1953 and 1970 (Manguso 1990:99).

3.1.3 Previous Surveys

Engineering Science (1993). In 1993, Engineering Science assessed the environmental consequences of the effects of the CSSA's activities on the installation and surrounding setting in an EA conducted for the Army. Impacts to cultural resources were considered as part of this document. The study concluded that there would be a high impact to cultural resources because little existing data was available to identify cultural resources at CSSA. No comprehensive survey had been conducted for either archaeological or architectural resources. The study recommended that surveys be conducted for both the identification of archaeological and architectural resources to identify both significant archaeological sites and extant buildings and structures that could be potentially adversely affected by CSSA's mission and other ongoing activities.

Prewitt and Associates (March 1998). An archaeological survey was conducted at CSSA from late 1996 to early 1997 by Prewitt and Associates (Kibler, *et al.* 1998). This was the first formal archaeological survey on the installation. Within the Inner Cantonment, approximately 977 acres were surveyed. Five parcels in the Outer Cantonment were surveyed, comprising 1,148 acres; four of the parcels were in the far northern portion of CSSA and one was near the southern boundary of CSSA. Pedestrian survey was accomplished by 4 or 5 people walking in transects of roughly 25 to 40-meter intervals. Areas that had been severely disturbed by military activity (provided on a map from the USACE, Fort Worth District) were not surveyed, since archaeological potential would be low. Exposed areas such as two-track roads and eroded areas were examined for archaeological resources. In addition, historic maps were reviewed for guidance on areas likely to contain historic resources, and personnel at Camp Stanley and neighboring Camp Bullis were interviewed regarding previous land usage. Thirty-four archaeological sites were identified during this initial survey, including 16 prehistoric sites, 14 historic sites, and 4 sites with both prehistoric and historic components.

Prewitt and Associates (April 1998). In early 1997 an additional 991 acres of CSSA was surveyed for archaeological sites, and Phase II testing was conducted on three of the sites identified in the previous survey (Scott, *et al.* 1998). The surveyed acreage represented the remainder of CSSA that was not surveyed in the previous survey. Although 1,076 acres remained unsurveyed in the Outer Cantonment, 85 acres were not surveyed due to safety concerns and unexploded ordnance in the northern portion of the survey area. Six more archaeological sites were identified: one prehistoric site and five historic sites. One site (41BX1235) was recommended as potentially eligible for listing in the NRHP. With the completion of this survey, all of CSSA had been subjected to archaeological survey.

NRHP testing of prehistoric Site 41BX1180 tentatively identified Late Paleoindian and Late Archaic components. However, Site 41BX1180 was found to be eroded and the components could not be isolated for study. The main feature at the site – a burned hearth – could not be

clearly associated with either component. Therefore, Site 41BX1180 was recommended not eligible for listing in the NRHP.

NRHP testing at two historic sites, 41BX1163 and 41BX1189, suggested that both were part of the same series of World War I training trenches, and that they should be considered one site (41BX1163/1189). These trenches are associated with the filming of the movie *Wings*, which won the first Academy Award for best picture in 1927. While the trenches have limited research value, they retain their integrity and association with nationally significant events during World War I. Therefore, Site 41BX1163/1189 was recommended as potentially eligible for listing in the NRHP.

Science Applications International Corporation (1997). Science Applications International Corporation (SAIC) conducted the first architectural survey of CSSA in 1997 (SAIC 1997b). During this study, SAIC documented all pre-1945 buildings and structures along with some Cold War-era buildings. Individual resources identified during the survey were documented according to Level IV Historic American Building Survey (HABS) standards. SAIC documented a total of 69 buildings and structures. All of these buildings dated from the period of 1917-1945. SAIC determined that none of the buildings met NRHP criteria and the facility did not comprise a significant collection of historic resources that would constitute a historic district.

Parsons, Inc. (2002, 2004, 2005, 2006, and 2007). In 2002, Parsons conducted an assessment of effect studies for Buildings #50, 64, 65, 77, and three separate similar studies for Buildings #43, A-100, and 11. Because of substantial deterioration and subsurface soil or contamination, the Army planned to demolish Buildings #11, 43, 50, 64, 65, 77. Alterations to Building A-100 were also proposed that would remove only non-historic features of the building in an effort to further its continued use. The Parsons reports concluded that the proposed demolition of Buildings #11, 43, 50, 64, 65, and 77 would have an adverse effect and the proposed renovation plans would not adversely affect Building A-100. An MOA was executed with the SHPO to mitigate these adverse effects. The agreed upon means for mitigation was the preparation of Historic American Building Survey/Historic American Engineering Record (HABS/HAER) documentation for the buildings scheduled for demolition. In accordance with the MOA, Parsons prepared Level III HABS/HAER documentation for Buildings #11, 43, 50, 64, 65, and 77, which were submitted to the SHPO. All of these buildings have since been demolished. Several small structures were evaluated and determined not eligible for NRHP listing; the SHPO concurred with these recommendations for the following: Building 27, motor pool storage building (concurrence dated October 14, 2005); Building 78, welding building (concurrence dated September 27, 2006); Buildings 81, 82, 83, and 84, remnants of guard shelters (concurrence dated May 18, 2006), and all were later demolished. Building 36 security (formerly change house) was evaluated as part of adding a wing and other renovations and deemed not eligible for NRHP listing and Building 73 laboratory was evaluated as part of renovations and deemed not eligible for NRHP listing; SHPO concurred on October 14, 2005.

Department of Defense (DoD) program comment on ammunition storage structures related to WWII and the Cold War. In 2006, DoD coordinated a program comment with the ACHP and state SHPOs. DoD and its departments finalized implementation guidance in 2007. Under 36 CFR 800.14(e), Program Comments are a programmatic compliance mechanism that allows Federal agencies to meet Section 106 of the National Historic Preservation Act (NHPA) compliance requirements through a one-time, agency-wide action for an entire category of

properties. Below is a list of CSSA ammunition storage facilities that are removed from further consultation by this nationwide programmatic comment. Documents related to this program comment are at Appendix F.

- A-101 - 103 Standard Magazines 1939-1940
- 104-128 Even Numbers Only Igloo Magazines 1939-1940
- 135 - 165 Igloo Magazines 1939-1940
- 202 - 203 Igloo Magazines 1973
- 212 - 286 Igloo Magazines 1939-1940
- I-287 – 291 Standard Magazines 1939-1940

Parsons, Inc. (2009 – 2013). Four buildings were evaluated and submissions made to the SHPO asking for concurrence that these buildings were not eligible for listing on the NRHP. Building 293, wastewater treatment plant, was removed from CSSA's list of potentially eligible buildings by consultation with SHPO on December 10, 2009 concluding it was not eligible because it no longer possessed its historic integrity. T98, Change House/Environmental and Engineering/Conference Room (1942) was removed from CSSA's list of potentially eligible buildings in consultation with SHPO on May 24, 2011 concluding it was not eligible because it no longer possessed its historic integrity. Building 38, Operations Building/Public Works (1941), was removed from CSSA's list of potentially eligible buildings in consultation with SHPO on June 1, 2012 concluding it was not eligible because it no longer possessed its historic integrity. Building 44, Inspector's Workshop/Surveillance Building (1943), was removed from CSSA's list of potentially eligible buildings in consultation with SHPO on December 7, 2012 concluding it was not eligible because it no longer possessed its historic integrity. These buildings have been demolished or are slated to be demolished.

CSSA Environmental Safety Office (2014). The CSSA Environmental Safety Office surveyed CSSA for structures built from 1945 – 1963 as part of this ICRMP update. Only three very small storage buildings and a small swimming pool are extant from this time period. Collectively, these resources are associated with the Cold War era mission of CSSA. As such, the Army's *Thematic Study and Guidelines: Identification and Evaluation of U.S. Army Cold War Era Military-Industrial Historic Properties* (USAEC 1997) provides guidance concerning identification of the proper context and resource types under which surveyed resources can be considered eligible for NRHP listing for their military association. Appendix G contains a full evaluation of these four Cold War era structures. THC concurred in those potential eligibility determinations as part of its March 27, 2014 comments on the revised February 2014 CSSA ICRMP.

3.1.4 Predictive Model

The CSSA property was divided into areas with “great disturbance” and “little disturbance” for the purposes of completing archaeological surveys (Kibler, *et al.* 1998). Disturbed areas are places where ground-disturbing activities had taken place, and were not surveyed unless historic resources were known to be located in the area. The unsurveyed areas include parcels that have been built on, and areas known to have, unexploded ordnance present. One hundred percent of the areas with minimal disturbance were surveyed (Kibler *et al.* 1998; Scott, *et al.* 1998); therefore, there is no future need for archaeological survey, or for a predictive model to locate archaeological sites. Future archaeological work at the site should focus on evaluation of the potentially eligible resources.

3.2 Cultural Resources Inventory

3.2.1 Archaeological Sites

Two archaeological surveys were conducted at CSSA by Prewitt and Associates in late 1996/early 1997 (see Section 3.1.3 Previous Surveys). These surveys covered all of CSSA, except for areas considered too disturbed to have more than a low potential for archaeological sites. Forty archaeological sites were identified at CSSA, and are listed in Table 3.1; sites recommended by the contractors as eligible or potentially eligible for inclusion on the NRHP are shown in **bold**. Seven sites have been recommended as potentially eligible for the National Register. The SHPO concurred with these findings (see Appendix D – Correspondence). Four of the sites recommended as potentially eligible require further archival documentation to determine NRHP eligibility; this evaluation is one of the upcoming goals for the Cultural Resources Program at CSSA (see Section 1.5 Cultural Resources Goals and Objectives).

Thirty-four of the archaeological sites were identified during the initial survey, including 16 prehistoric sites, 14 historic sites, and four sites with both prehistoric and historic components (Kibler, *et al.* 1998). The prehistoric sites were interpreted as open campsites or lithic scatters. Early, Middle, and Late Archaic, as well as Late Prehistoric time periods were represented in prehistoric sites with datable components. Historic sites were classified as either military (1906-1945) or pre-military (pre-1906). Military components represented World War I training trenches, utilities and infrastructure, facility plans, housing properties, service/support properties, and unidentified property types of early Camp Stanley. The pre-military sites were a 19th-century homestead, 20th-century ranches, and a possible 20th-century saloon. One prehistoric site (41BX1180) was recommended potentially eligible for listing on the NRHP. Four historic sites (41BX1163, 41BX1170, 41BX1179, and 41BX1188) and historic components at two sites (41BX1172 and 41BX1189) were recommended potentially eligible for inclusion on the NRHP. A small number of diagnostic prehistoric and historic artifacts were collected during the survey.

Six more archaeological sites were identified during the second survey by Prewitt and Associates: one prehistoric site and five historic sites (Scott, *et al.* 1998). One site (41BX1235) was recommended as potentially eligible for listing in the NRHP.

Three sites underwent NRHP evaluation testing during the second survey. Testing of prehistoric Site 41BX1180 tentatively identified Late Paleoindian and Late Archaic components. However, Site 41BX1180 was found to be eroded and the components could not be isolated for

study. The main feature at the site – a burned hearth – could not be clearly associated with either component. Therefore, Site 41BX1180 was recommended not eligible for listing in the NRHP.

NRHP evaluation testing at two historic sites, 41BX1163 and 41BX1189, suggested that both sites were part of the same series of World War I training trenches, and that they should be considered one site (41BX1163/1189). These trenches are associated with the filming of the movie *Wings*, which won the first Academy Award for best picture in 1927. While the trenches have limited research value, they retain their integrity and association with nationally significant events during World War I. Therefore, Site 41BX1163/1189 was recommended potentially eligible for listing in the NRHP.

Table 3.1. Archaeological Sites Identified at CSSA and NRHP Recommendations

Site Number*	Site Type	Time Period(s)	Site Function	NRHP Recommendations after Phase I or II
41BX1156	Prehistoric & Historic	P: unknown; H: 20th C	P: open campsite; H: military	Ph I: Not eligible
41BX1157	Prehistoric	unknown	open campsite	Ph I: Not eligible
41BX1158	Prehistoric	unknown	open campsite	Ph I: Not eligible
41BX1159	Historic	20th C	Military	Ph I: Not eligible
41BX1160	Historic	20th C	Military	Ph I: Not eligible
41BX1161	Historic	20th C	Military	Ph I: Not eligible
41BX1162	Historic	20th C	Military	Ph I: Not eligible
41BX1163 (associated with 41BX1189)	Historic	World War I	Military training trenches	Ph II: Potentially Eligible (Criteria A and C)
41BX1164	Historic	20th C	Military	Ph I: Not eligible
41BX1165	Historic	20th C	Military	Ph I: Not eligible
41BX1166	Historic	20th C	Military	Ph I: Not eligible
41BX1167	Historic	20th C	Military	Ph I: Not eligible
41BX1168	Historic	20th C	Military	Ph I: Not eligible
41BX1169	Prehistoric & Historic	P: Late Archaic; H: 20th C	P: open campsite; H: possible saloon	Ph I: Not eligible
41BX1170	Historic	Early 20th C	Scharmann ranch	Ph I: Potentially eligible
41BX1171	Prehistoric	unknown	Open campsite	Ph I: Not eligible
41BX1172	Prehistoric & Historic	P: Late Archaic; H: early 20th C	P: open campsite; H: Scharmann ranch	Ph I: Potentially eligible
41BX1173	Prehistoric	Early Archaic, Late Prehistoric	Open campsite	Ph I: Not eligible
41BX1174	Prehistoric	Late Archaic	Open campsite	Ph I: Not eligible
41BX1175	Prehistoric	unknown	Open campsite	Ph I: Not eligible

Table 3.1. Archaeological Sites Identified at CSSA and NRHP Recommendations (*cont.*)

Site Number*	Site Type	Time Period(s)	Site Function	NRHP Recommendations after Phase I or II
41BX1176	Prehistoric	Early Archaic	lithic scatter	Ph I: Not eligible
41BX1177	Prehistoric	Late Prehistoric	Open campsite	Ph I: Not eligible
41BX1178	Prehistoric	unknown	lithic scatter	Ph I: Not eligible
41BX1179	Historic	Early 20th C	Ranch/Blank farm and warden station	Ph I: Potentially eligible
41BX1180	Prehistoric	Late Paleoindian & Late Archaic	Open campsite	Ph II: Not eligible
41BX1181	Prehistoric	unknown	lithic scatter	Ph I: Not eligible
41BX1182	Prehistoric	unknown	lithic scatter	Ph I: Not eligible
41BX1183	Prehistoric	Late Archaic	lithic scatter	Ph I: Not eligible
41BX1184	Prehistoric	unknown	Open campsite	Ph I: Not eligible
41BX1185	Prehistoric	Early Archaic, Late Archaic	Open campsite	Ph I: Not eligible
41BX1186	Historic	Early 20th C	Ranch/Wilke farm	Ph I: Not eligible
41BX1187	Prehistoric	unknown	Open campsite	Ph I: Not eligible
41BX1188	Historic	20th C (1907)	Military rifle range	Ph I: Potentially eligible
41BX1189 (historic component associated with 41BX1163)	Prehistoric & Historic	P: unknown; H: 19th C & World War I	P: lithic scatter; H: homestead (19th C) & military (20th C)	Potentially Eligible (Criteria A and C) (historic military component only)
41BX1233	Prehistoric	Middle Archaic?	Open campsite	Ph I: Not eligible
41BX1234	Historic	20th C	WWI training target abutment/small arms range	Ph I: Not eligible

Table 3.1. Archaeological Sites Identified at CSSA and NRHP Recommendations (*cont.*)

Site Number*	Site Type	Time Period(s)	Site Function	NRHP Recommendations after Phase I or II
41BX1235	Historic	World War I	WWI training trenches cut into bedrock	Potentially Eligible (Criteria A and C)
41BX1236	Historic	19th C & 20th C	rock wall (assoc w/ 19th C farmstead) & 21 military structures/bunkers (WWI and WWII)	Ph I: Not eligible
41BX1237	Historic	20th C (ca.1930s)	5 artillery practicing positions or battery emplacements	Ph I: Not eligible
41BX1238	Historic	20th C (ca.1930s)	5 artillery practicing positions or battery emplacements	Ph I: Not eligible

*Potentially eligible in **bold**

3.2.2 Architectural Resources

CSSA contains a total of 196 buildings and structures, along with infrastructural features that include roads and landscape elements. The buildings are concentrated in a rural setting within the Inner Cantonment which consists of a variety of building types primarily associated with munitions storage and support buildings that include administration, residences, operations, warehouses, vehicle storage, and utility related structures.

To meet basic NRHP criteria, all architectural resources must be at least 50 years of age or possess exceptional significance that would meet NRHP Criteria Consideration G, which provides for eligibility or listing of select resources that have not yet matured to 50 years. The SAIC survey did not comprehensively inventory post-1945 resources.

Overall, CSSA retains good integrity, and many of its late 1930s and early 1940s buildings remain intact; however, the facility has undergone some new construction since the end of World War II. Most of the new construction on CSSA has occurred since September 2001. Although many of the historic buildings have undergone alterations that include, but are not limited to, window replacement, additions, and new roofing, few of the changes have substantially diminished the ability of the majority of the facility’s buildings to convey their World War II-era significance. A complete listing of CSSA’s existing buildings constructed prior to 1945 which are potentially eligible for listing on the NRHP is included in Table 3.2 below. The ammunition storage structures are not included because they are covered by the 2007 nationwide program comment. Buildings constructed between 1945 and 1963 were also evaluated as part of this

ICRMP update (Appendix G), and one (building 97) was added to the list of potentially eligible buildings. THC concurred in those potential eligibility determinations as part of its March 27, 2014 comments on the revised February 2014 CSSA ICRMP.

Table 3.2. Potentially NRHP Eligible Historic Structures

Building Number	Building Name or Use	Date of Construction
1	Administrative Building. A two-story administration facility located near the center of the Camp Stanley’s Inner Cantonment. This building has functioned as the headquarters for the Camp. It has off-white masonry walls and red clay tiled roofs.	1939
2	Office / Conference Room is 1,218 sq ft masonry bldg with red clay tiled roof used for many decades as as transient quarters.	1939
3	Flagpole is located in the parking lot immediately north of bldg 1.	1940
4	Garage is 5,709 sq ft structure which has a multi-bay garage for the motor pool. It has off-white masonry walls and red clay tiled roofs.	1941
5	Gas and Oil Building is a 733 sq ft masonry used for storage by the motor pool. It has off-white masonry walls and a red clay tiled roof.	1941
T15	Root Cellar is a 162 sq ft masonry structure in the housing area.	ca 1920
20	Pump House is a 118 sq ft masonry off-white structure.	1942
21	NCO Quarters is a 2,965 sq ft masonry structure used as housing. It has off-white masonry walls and a red clay tiled roof.	1939
22	NCO Quarters is a 2,965 sq ft masonry structure used as housing. It has off-white masonry walls and a red clay tiled roof.	1939
23	NCO Quarters is a 2,965 sq ft masonry structure used as housing. It has off-white masonry walls and a red clay tiled roof.	1939
24	NCO Garage is a 1,580 q ft masonry structure used for housing residents’s vehicles. It has off-white masonry walls and a red clay tiled roof.	1939
26	Paint Mixing Building / Janitor Storage / SCADA is a 144 sq ft masonry structure used for janitor storage and SCADA. It has off-white masonry walls and a red clay tiled roof.	1943

Building Number	Building Name or Use	Date of Construction
28	Locomotive Shelter / Empty Drum Storage is a 1,144 sq ft off-white masonry structure used for storage. It has a red corrugated transite roof.	1943
42	Deboosting Barricade is a 637 sq ft off-white masonry structure which was used for safely discharging weapons.	1941
45	Shipping and Receiving Building is a one-story shipping and receiving facility with 7,064 sq ft consisting of masonry sides. It has four interior bays, concrete floors, and concrete walls with a steel frame and is used for munitions storage. The brick walls are unpainted brown in color and it has a standing seam metal roof.	1943
46	Heating Plant is a 393 sq ft masonry structure adjacent to bldg 45. It is no longer used as a heating plant and is used for limited storage. The brick walls are unpainted brown in color and it has a corrugated transite roof.	1943
51	Guard Shelter-main is a 110 sq ft masonry structure that is part of the main gate entrance. It has off-white masonry walls and a red clay tiled roof.	1939
52	Fire Observation Tower is a 49 sq ft metallic structure atop the hill to the south of bldg 1.	1939
53	Fire Observation Tower is a 49 sq ft metallic structure atop the hill to the east of bldg 1.	1939
54	Chlorination Building is a 53 sq ft off-white masonry structure used to house chlorination equipment for a nearby well.	1942
66	Latrine, East Spur Tract is an 80 sq ft off-white masonry structure with red clay tiled roof used for storage.	1943
76	Reservoir is a 600,000 gallon mostly underground concrete structure used for drinking water storage.	1942
79	Guard Shelter / Visitor Center is a 636 sq ft masonry off-white structure with red clay tiled roof near the front gate used for visitor inprocessing.	1942
80	Guard Shelter / Remount Station is a 420 sq ft masonry structure which had been used many decades ago for housing horses for patrolling CSSA.	1942
85	Guard Tower is a 128 sq ft two-story off-white masonry guard tower by the south gate on Ralph Fair Road. It has	1939

Building Number	Building Name or Use	Date of Construction
	white masonry walls and a red clay tiled roof.	
90	Clipping, Belting & Linking is a 30,000 sq ft (60 X 500 ft) off-white masonry building with gravel roof, 42,584 sq total including associated concrete docks surrounding the structure. It initially housed Clipping, Belting & Linking, then CSSA's armory, and is now used for storage.	1942
W-91	Standard Warehouse is a rectangular-shaped one-story warehouse facility with 39,600 sq ft (66 X 600 ft) dimensions consisting of off-white masonry sides and a red corrugated transite roof which has been replaced with a red standing seam metal roof.	1942
W-92	Standard Warehouse rectangular-shaped one-story warehouse facility with 39,600 sq ft (66 X 600 ft) dimensions consisting of off-white masonry sides and a red corrugated transite roof, which is being replaced with a red standing seam metal roof.	1942
W-93	Standard Warehouse rectangular-shaped one-story warehouse facility with 39,600 sq ft (66 X 600 ft) dimensions consisting of off-white masonry sides and a red corrugated transite roof, which has been replaced with a red standing seam metal roof.	1942
W-94	Standard Warehouse rectangular-shaped one-story warehouse facility with 39,600 sq ft (66 X 600 ft) dimensions consisting of off-white masonry sides and a red corrugated transite roof	1942
W-96	Standard Warehouse rectangular-shaped one-story warehouse facility with 39,600 sq ft (66 X 600 ft) dimensions consisting of off-white masonry sides and a red corrugated transite roof	1942
97	General Storehouse of 157 sq ft. This 12 X 13 foot off-white structure has a concrete foundation, concrete walls, and gabled roof with red Spanish tile. The main elevation contains a pedestrian door and an oversize door; a side elevation exhibits a small louvered window. Building 97 was constructed to house electrical equipment.	1947
99	Electric Power Station / Empty is an 880 sq ft off-white masonry structure that is currently not being used.	1942

Building Number	Building Name or Use	Date of Construction
A-100	Receiving and Shipping Warehouse is a 10,926 sq ft off-white masonry building that was formerly an ammunition magazine and probably should have been covered by the 2007 nationwide Program Comment on WWII Ammunition Storage Facilities, however, it was omitted off that list despite being the same structure as two adjacent magazines that were included in the Program Comment. It is currently used for storage and administrative space.	1939
294	Incinerator is an 847 sq ft brown masonry structure that has not been used for decades.	1943

SECTION 4 MANAGEMENT PLAN

4.1 Introduction

Section 4 describes the procedures by which CSSA complies with the requirements of the federal laws and regulations cited in Section 2.2 while maintaining the installation mission. In particular this section addresses compliance with Sections 106 and 110 of NHPA, though it also addresses ARPA, Native American consultation, and integration of Section 106 with NEPA compliance.

Section 110 of the NHPA requires federal agencies to preserve historic properties in their possession. Federal agencies must identify, inventory, and maintain historic properties under their control. CSSA has nearly completed a systematic program of identifying historic properties within its bounds.

Section 106 of the NHPA requires federal agencies to assess the effects their activities might have upon historic properties and provide the ACHP a reasonable opportunity to comment on such undertakings. An undertaking is defined as a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of the CSSA that can result in changes in the character or use of historic properties within the Area of Potential Effects (APE) of the undertaking. The APE is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties” (800.16(d)). “Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian tribe or Native Hawaiian organization and that meet the National Register criteria (36 CFR 800.16(l)(1)).” The criteria for eligibility to the NRHP are cited in 36 CFR 60. The Section 106 Review Process is spelled out in federal regulations issued by the ACHP, entitled “Protection of Historic Properties.” The regulations appear in 36 CFR 800, issued by the ACHP under its rule-making authority, and are summarized below in Section 4.4.

4.1.1 Native American Concerns

As described in Section 3.1.2, three federally recognized Native American tribes used the CSSA area historically, the Comanche, the Mescalero Apache, and the Tonkawa. Although the Comanche and the Mescalero Apache may not have had permanent settlements in the region. Two additional tribes claim descent from Native Americans that once lived in the CSSA area, the Tap Pilam Coahuiltecans, and the Lipan Apache Band of Texas. Both of these groups claim descent from Native Americans who entered the Spanish missions and became Catholics, and both have petitioned for federal recognition using church documents as well as oral history to demonstrate their ancestry and cultural continuity. The headquarters of both groups are in the greater San Antonio area, and the Tap Pilam Coahuiltecans actively engage in consultation when issues that affect their local community arise. Neither the Tap Pilam nor Lipan Apache are federally recognized tribes.

Concerns specific to Native Americans usually revolve around the identification and preservation of TCPs, access to sacred and ceremonial sites, and preservation of cemeteries or burial grounds. CSSA has not been surveyed for TCPs, and there has been no effort to consult with interested Native American groups to identify their presence. No Native American burial sites were identified during the archaeological surveys of CSSA, and the potential for their presence is low. There are no local federally recognized tribes with whom to consult over TCPs. The out-of-state federally recognized tribes that the much larger adjacent military facility, Camp Bullis, has attempted to consult with over TCPs have appeared to not be interested in providing such input. If Camp Bullis ever obtains such input, we will consider using that input or performing our own consultation.

4.1.2 CSSA Programs Impacted by Cultural Resources Management

Under Section 106 of the NHPA, all CSSA construction and training activities that may affect the physical landscape are subject to review for possible adverse impacts to identified or unidentified historic properties. The integration of this review into the NEPA process ensures that CSSA construction projects meet the compliance criteria associated with all federal undertakings as defined in 36 CFR 800, while minimizing possible disruption of mission essential activities. Natural resource management operations, building maintenance and repair, and other landscape modification projects should also be routinely reviewed by the CRM.

When an archaeological site or historic property protected under NHPA, ARPA, NAGPRA, or other applicable federal or state regulations has been disturbed or damaged as a result of unauthorized activity or noncompliance with the CSSA review process, the CRM will review site records, inspect the site to assess damage, file a report with the SHPO, and initiate consultation in accordance with 36 CFR 800.13(b)(1). If the matter involves a potential ARPA violation, it will be forwarded to the local office of the Army Criminal Investigation Division (CID): the 25th MP Det (CID) at Fort Sam Houston, Texas for action in accordance with 43 CFR §7; contact information is provided in Section 4.8. Additionally, the CRM will notify the Tribes listed in Section 4.7 if the damage resulted in destruction of sites having Native American religious or cultural importance.

The CSSA land management activities listed below are identified as having significant potential for the disturbance or destruction of cultural resources on properties controlled by CSSA.

- **Training:** Activities related to the development, modification, and maintenance of training areas and ranges.
- **Construction:** Activities relating to the modification or disturbance of the CSSA installation landscape in preparation for or in response to the construction, repair, modification, or demolition of buildings and structures within the physical boundaries of CSSA.
- **Road Maintenance:** Activities relating to the construction, modification, or repair of roads, trails, tank trails, stream crossings, and other surface features associated with mechanized or foot travel that may impact subsurface archaeological deposits on CSSA.

- **Recreational Programs:** Activities that are performed by CSSA, CSSA contractors, hunters, or other authorized visitors that modify or affect those portions of CSSA used for non-military activities such as hunting in the Outer Cantonment.
- **Environmental Remediation/Restoration:** Excavation, drilling, and clearing that may be undertaken to address environmental contamination sites.

4.1.3 Procedures to Lessen Conflicts

Management of other resource activities can conflict with the management of cultural resources from time to time. For instance, land utilized for wildlife grazing may result in soil erosion or the disturbance of cultural resource sites. In integrating cultural resource management with the ongoing mission of CSSA and resource management of other disciplines, every effort is made to avoid sensitive areas for cultural resources. To this end, the CRM maintains the most up-to-date information concerning cultural and natural resource management. The CRM needs to be notified early in the planning process for any potential projects to ensure that changes in location and/or timing are studied and implemented with minimal impact to cost and schedule.

4.1.4 ARPA Violations

There are no known or suspected ARPA violations at CSSA. Prior to being recommended as eligible for listing on the NRHP, individuals scoured the surface around the World War I training trenches at archaeological Sites 41BX1163 and 41BX1189 and in other areas for artifacts such as buttons and uniform insignia. Little or no ground-disturbance accompanied these activities according to the CSSA CRM.

4.2 PRESERVATION AND MITIGATION STRATEGIES

The primary objective of this ICRMP is to integrate the legal requirements of historic preservation with the planning and accomplishment of mission-essential activities as well as real-property and land-use decisions at CSSA. To comply with those laws and regulations noted in Section 2, the CRM must identify and protect all classes of historic properties at CSSA. When evaluating a proposed project, the CRM must first determine if the proposed action is an undertaking. An undertaking is a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of the CSSA that can result in changes in the character or use of historic properties. The CRM must then determine whether any of the known historic properties or archaeologically sensitive areas within the installation fall within the APE (the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties) to determine whether undertakings at CSSA will affect historic properties (36 CFR 800.4).

The CRM also needs to consider the potential impact of undertakings on neighboring historic properties. Planning such projects may proceed with the understanding that changes in design or delays may occur where mitigation must be applied as a result of a consultation. The CRM must consult in a timely manner with the SHPO concerning all undertakings that have the potential to affect historic properties not otherwise excluded by a PA or MOA.

The CRM must protect historic properties using avoidance, physical protection, data recovery, or other mitigation procedures, and regularly review the adequacy of such

preservation/protection measures. There are several useful documents that address site protection/preservation. Two of these are *Advisory Council on Historic Preservation's Treatment of Archeological Properties: A Handbook* (2009) and the Secretary of the Interior Standards and Guidelines (Federal Regulation on treatments, Preservation, Rehabilitation, Restoration, and Reconstruction. The treatment Standards, developed in 1992, were codified as 36 CFR Part 68 in the July 12, 1995 *Federal Register* (Vol. 60, No. 133). These guidance documents can be used as a means for avoiding adverse effects and addressing preservation/protection of architectural historic resources.

4.2.1 Archaeological Resources

All areas of CSSA likely to contain intact archaeological resources have been surveyed. Of the 40 sites identified, seven are considered potentially eligible and 33 are not eligible for NRHP listing. Protection of the seven potentially eligible sites includes the measures listed below, but is not limited to them.

- Avoidance of all areas having potentially eligible sites.
- Physical protection of individual sites by fencing, berming, burying, or taking protective measures to make them inaccessible.
- Monitoring the effectiveness of protective measures during an undertaking.
- Protection of a statistically valid sample of the different classes of resources present. Since there are only seven potentially eligible sites at CSSA, this option is not feasible.

When protection of a resource is impossible, data recovery should be conducted to compensate for the site's loss of integrity and information potential. Guidelines for data recovery are listed below.

- The data recovery program should be structured to retrieve a representative sample of the information that justified the site's significance and NRHP status.
- It should meet federal standards pertinent to documentation and excavation (36 CFR Part 66; 48 FR 44734-44737). Close coordination with the SHPO is required at this stage of preservation activities.
- Data recovery projects will be actively directed by a professional archaeologist who meets the Secretary of the Interior's qualifications for archaeology (36 CFR 61, Appendix A).
- A data recovery plan will be prepared for each mitigation project. The plan will describe the significance of each investigated site to the archaeological record or surrounding region. It will justify significance by relating the kinds of information present at the site to specific questions that the recovered information can address. With respect to field investigations, the plan will thoroughly discuss the kinds of data recovery techniques employed and the specific information those techniques are designed to recover; it also will indicate and justify the use of various techniques at different locations within the site.
- Although data recovery projects will be problem-oriented, investigation should also seek to obtain a reasonable amount of information that may be useful for addressing

other questions or problems in the future. To summarize, data recovery should attempt to recover a wide range of data.

- To adapt to unforeseen problems, discoveries, and opportunities, data recovery projects will be designed with flexibility in mind.

4.2.1.1 Erosion

Four of the seven archaeological sites determined potentially eligible for listing on the NRHP at CSSA have already been impacted by erosion. Site 41BX1163 is located on the floodplain of Salado Creek, and erosion occurs when the creek floods. The World War I training trenches that make up this site have been partially filled by eroded soil, which may actually offer some protection from the elements for the trenches. Site 41BX1189 also contains World War I training trenches that are being filled by erosion. Both 41BX1163 and 41BX1189 are potentially eligible for NRHP listing as a combined site 41BX1163/1189. The remaining two sites, 41BX1170 and 41BX1172, are both part of the same historic ranch, and have exposed foundations present. These potentially eligible sites have suffered erosion because of their locations on mild slopes. The erosion at these sites should be monitored, and if the severity of erosion increases, or if features at them are threatened by erosion, it may be necessary to establish a plan for reducing erosion. For example, anti-erosion measures might consist of protecting the features with fill (burial), or grading the upslope areas to check the velocity of runoff through the sites. In addition, minimizing traffic across the sites and leaving vegetation in place will also help reduce erosion. Any removal of vegetation should be done without disturbing the soil. If Sites 41BX1170 and 41BX1172 are determined not eligible for NRHP listing in the future then anti-erosion measures would not be justified.

4.2.1.2 Vandalism and Looting

CSSA is a restricted access military facility; rendering the archaeological sites inaccessible to the general public. Consequently, little or no looting has taken place at CSSA archaeological sites. Education of all post personnel, including civil, military, contractors, and visitors, of the penalties for looting, destruction, disturbance, or damage of archaeological sites would likely prevent future incidents. Implementation of an education/ awareness program is accomplished through compliance inspections done as part of annual environmental compliance visits to the workplaces and with Public Works and the CSSA engineer and by restricting deer hunting to designated stand areas and prohibiting stalk hunting.

4.2.1.3 Undertakings

No major undertakings impacting more than five acres of land are planned for the next five years.

4.2.2 Curation of Archaeological Collections

One collection of archaeological artifacts is known for CSSA. It consists of historic and prehistoric artifacts that resulted from the 1996-1997 archaeological survey and testing at CSSA by Prewitt and Associates, Inc. (Scott, *et al.* 1998). In April 1998, this collection was transferred to the archaeological curation facility at the Texas Archaeological Research Laboratory (TARL) of the University of Texas at Austin (see Letter of Transmittal in Appendix D –

Correspondence). In the unlikely event that additional collections of artifacts are made at CSSA, arrangements can be made with TARL to curate them as well.

4.2.3 Architectural Resources

The best means to ensure identification, evaluation, and registration of resources is to continue architectural survey efforts of the facility every five years. These surveys should identify and provide an NRHP eligibility evaluation for architectural resources that have reached 50 years of age. Procedures for conducting architectural survey require consultation with the SHPO, discussed in more detail in Section 4.4.

Pre-1945 buildings and structures have been surveyed and evaluated prior to 2009. Buildings and structures constructed between 1946 and 1963 are currently 50 years of age have been surveyed by the CSSA Environmental Safety Office as part of this ICRMP update. Only four Cold War era architectural resources were identified: three very small storage buildings and a outdoor swimming pool. Architectural surveys for buildings and structures constructed between 1963 and 1969 will need to be conducted to ensure that these buildings are properly documented and evaluated for NRHP eligibility prior to 2019.

Ongoing public works and infrastructure projects will most certainly require CRM consultation with regard to demolition or alteration of NRHP-eligible resources.

At present, there is no PA in place at CSSA that will streamline cultural resource consultation. Consequently, assessment of effects for architectural resources must be conducted on a case-by-case basis in consultation with the SHPO. Should there be a determination that adverse effects will occur, mitigation procedures are required. Minimization and mitigation measures would be considered in consultation with the SHPO. Typical minimization measures that could apply to historic properties include:

- Limiting the magnitude of any undertaking to avoid affecting the characteristics that make each property an historic resource;
- Adaptive reuse of the properties instead of demolition; and
- Performing project activities or construction to ensure site preservation.

When demolition or substantial alteration is required, recordation by HABS/HAER should be accomplished, most probably Level II (the level of HABS/HAER documentation is determined through consultation with the NPS HABS/HAER Division).

Documentation according to the HABS/HAER standards involves specialized research and recordation of a historic property through compilation and preparation of historical information (written materials), photographs, and measured drawings. For very important properties, the documentation is reviewed by the NPS and once accepted, submitted to the Library of Congress in Washington D.C. for permanent archiving. Due to the volume of materials, it is now common for the NPS to defer review and acceptance of recordation for less prominent properties to the respective SHPOs.

4.2.4 Maintenance Considerations

These inspection and review procedures have been developed for maintenance of eligible and/or potentially eligible buildings and structures. Section 5 discusses SOP for maintenance, repair, and replacement as needed. The major maintenance inspection and review items are:

- Masonry and concrete;
- Wood;
- Metal;
- Roofs;
- Windows;
- Doors and entrances; and
- Interiors, spaces and features.

A systematic inspection and review are recommended on an annual basis. A continual record of these inspections should be maintained and reviewed prior to each follow-on inspection. The safety officer conducts annual inspections and building managers routinely inspect their own buildings and input maintenance requests to Public Works.

The maintenance program should include:

- Inspection of contributing resources annually to identify items of concern;
- Evaluation the severity of any problem(s);
- Assess the change in condition of each element from the previous inspection;
- Review options available to correct any deficiencies on the historic property;
- Determine the effect of any deficiencies on the historic property;
- Prepare documentation for THC as required;
- Implement appropriate maintenance and repair work; and
- Reference of the applicable sections from the Secretary of the Interior's Preservation Briefs, as listed in Appendix C.

4.3 Internal Consultation

It is essential that internal review procedures for cultural resources documentation be initiated as early in project planning as possible, so that project engineers are allowed sufficient time to implement appropriate cultural resources activities, if required. A suggested approach to internal consultation at CSSA is provided below.

A responsible party, (*e.g.* a Building Manager), requests work by preparing standard project request forms and submitting them to the Facilities Engineer Branch. Project descriptions must be sufficiently detailed in order to determine the nature of any potential impacts to cultural resources. Project proponents should allow 2 weeks for project review by the CRM in the Safety and Environmental Office.

The CRM reviews all standard project request forms submitted to the Facilities Engineer Branch to determine if the action qualifies for CATEX under the NEPA process, or if additional review is necessary.

Major projects will receive an initial review by the Environmental Safety Office. If the action does not qualify for a CATEX, an EA or EIS must be completed. Project documentation will be resubmitted to the Facilities Engineer Branch after the undertaking has been funded, and has reached the 30 percent design stage. Funding is to be provided by project proponent.

The Facilities Engineer Branch will route the project documentation to the CRM if there is a potential for impacts to cultural resources.

If the project involves historic properties that may be eligible for the NRHP, the CRM will apply the criteria of effect in 36 CFR 800.5 (detailed in Section 4.4.1.3 Step 3: Assess Adverse Effects). If the project involves areas outside the boundaries of CSSA, the CRM will consult with the SHPO concerning the need for any cultural resources studies, and conduct required studies as described in Section 4.4 - External Consultation.

If the CRM determines the project will have an adverse effect on historic properties, the CRM informs the requester, or project manager of a potential for delay in the approval of the request, and sends a letter to the SHPO describing the project and the potential effect, and requests SHPO consultation on resolving adverse effects. The procedures are presented in detail in Section 4.4 - External Consultation. All outgoing correspondence from CSSA to the SHPO, or any other outside group or agency will be signed by the Installation Manager.

CRM revises documentation, as necessary, to meet any objections raised by the SHPO or ACHP if the ACHP is involved.

Project managers must allow 10 business days for review by the CRM. The CRM will assess potential effects to cultural resources using the criteria of effect in 36 CFR 800.5 (detailed in Section 4.4.1.3 Step 3: Assess Adverse Effects). The CRM will also consult the discussion of the Secretary of the Interior's Standards found in 36 CFR 61, Appendix A, and the procedures outlined in Section 4.4 for additional guidance in determining effect. Also, if the internal review finds there may be potential effects to cultural resources, project managers must also allow at least 30 calendar days for review by the SHPO as set forth in the following section on external consultation.

4.4 External Consultation

The following section describes the process by which federal agencies comply with NHPA Section 106. Because CSSA has already enacted a comprehensive program of survey to identify cultural resources, in most cases external consultation will involve assessing the effects undertakings may have upon known historic properties (Section 4.4.1.3), and resolving any adverse effects (Section 4.4.1.4). The entire process is described below for reference.

The Section 106 regulations (36 CFR 800.8) allow federal agencies to combine Section 106 Consultation with the NEPA process. CSSA should consider the Section 106 responsibilities as early as possible in the NEPA process in order to plan the public participation, analysis, and review to meet the purposes and requirements of both statutes in a timely and efficient manner. Determining whether an undertaking is a "major federal action significantly affecting the quality of the human environment," and therefore falling under NEPA requirements for the preparation of an EIS, should include consideration of the undertaking's likely effects on historic properties (36 CFR 800.8(a)(1)). Preparation of an EA and a FONSI, or an EIS and a Record of Environmental Consideration (REC), should include appropriate scoping, identification of historic properties, assessment of effects upon them, and consultation leading to resolution of

adverse effects (36 CFR 800.8(a)(3)). The CSSA may use the process and documentation required for the preparation of an EA/FONSI or an EIS/REC to comply with Section 106 instead of the procedures in 36 CFR 800.3 through 800.6 if the CSSA has notified the SHPO/THPO and the ACHP in advance that it intends to do so (36 CFR 800.8(c)). In addition, the CSSA must:

- Identify consulting parties consistent with 36 CFR 800.3(f);
- Identify historic properties and assess the effects of the undertaking on such properties consistent with 36 CFR 800.4 through 800.5;
- Consult regarding these effects with the SHPO/THPO, Native American groups, other consulting parties, and the ACHP, where appropriate, during NEPA scoping, analysis, and the preparation of NEPA documents;
- Involve the public in accordance with published NEPA procedures; and
- Develop, in consultation with identified consulting parties, alternatives and proposed measures that might avoid, minimize or mitigate any adverse effects of the undertaking on historic properties and describe them in the EA or draft EIS (36 CFR 800.8(c)(1)).

The CSSA's Section 106 responsibilities shall be satisfied when either:

- A binding commitment to the proposed measures is incorporated in either the REC (if such measures were proposed in a draft EIS or EIS) or a MOA drafted in compliance with 36 CFR 800.6(c); or
- The ACHP has commented under 36 CFR 800.7 and received the CSSA's response to such comments (36 CFR 800.8(c)(4)).

4.4.1 Consultation with the SHPO and the ACHP

The following guidelines for implementing Section 106 are adapted from the "Section 106 Regulations Users Guide" (ACHP 2003), and include step-by-step instructions for following 36 CFR 800. The process described below assumes there is no Programmatic Agreement in place.

The Section 106 process includes the following participants listed below.

- All federal agencies.
- The SHPO.
- The ACHP.
- Interested persons (those who have special concerns), including but not limited to:
 - Local Governments;
 - Applicants for Federal Assistance, Permits, and Licenses;
 - Native American Tribes;
 - Other Native Americans;
 - Traditional Cultural Leaders;
 - Land Owners and the Public; and

- Private Sector Organizations and Groups;
- The NPS.

All decisions about a federal undertaking will take into consideration the potential effects on potentially eligible historic properties. The Installation Manager will ensure compliance with Section 106 before issuing a permit for an undertaking to proceed, and before committing funds or other resources to the undertaking, except that non-destructive planning activities (such as compliance with NEPA, and Section 106 itself) may be conducted before completing Section 106 review. The Section 106 process is summarized in Figure 4.1. Sections 4.4.1.1 through 4.4.1.7 contain explanatory text to accompany Figure 4.1. Documentation requirements are discussed in Section 4.3.2.7.

4.4.1.1 Step 1: Initiate the Section 106 Process (800.3)

CSSA shall integrate the Section 106 process into agency planning at its earliest stages.

Determine if Action is an Undertaking (800.3(a))

The determination of whether or not an undertaking exists is CSSA's decision. However, the ACHP may render advice on the existence of an undertaking. If there is an undertaking, but there is no potential for it to have an effect on a historic property, then the CSSA is finished with its Section 106 obligations. If the action is subject to a program alternative, such as an alternate agency procedure, then CSSA will follow that process.

Examples of actions that are undertakings include: construction; rehabilitation and renovation of buildings; and land transfers. Examples of projects that are not undertakings include: work in areas that have been surveyed, and do not contain NRHP-eligible properties; and continued use of a building for its original purpose.

- **No undertaking/no potential to cause effects (800.3(a)(1)).** If the Installation Manager determines there is no undertaking as defined in Section 800.16(y), or there is an undertaking but it does not have the potential to cause effects on historic properties, there are no further obligations under Section 106 or the ACHP's regulations. The Installation Manager will document and maintain a record of such findings to answer any future questions from members of the public or other parties at a later date.
- **Undertaking might affect historic properties.** Assuming the Installation Manager has determined that the undertaking does have the potential to cause effects on historic properties, CSSA proceeds to identify properties that might be affected.

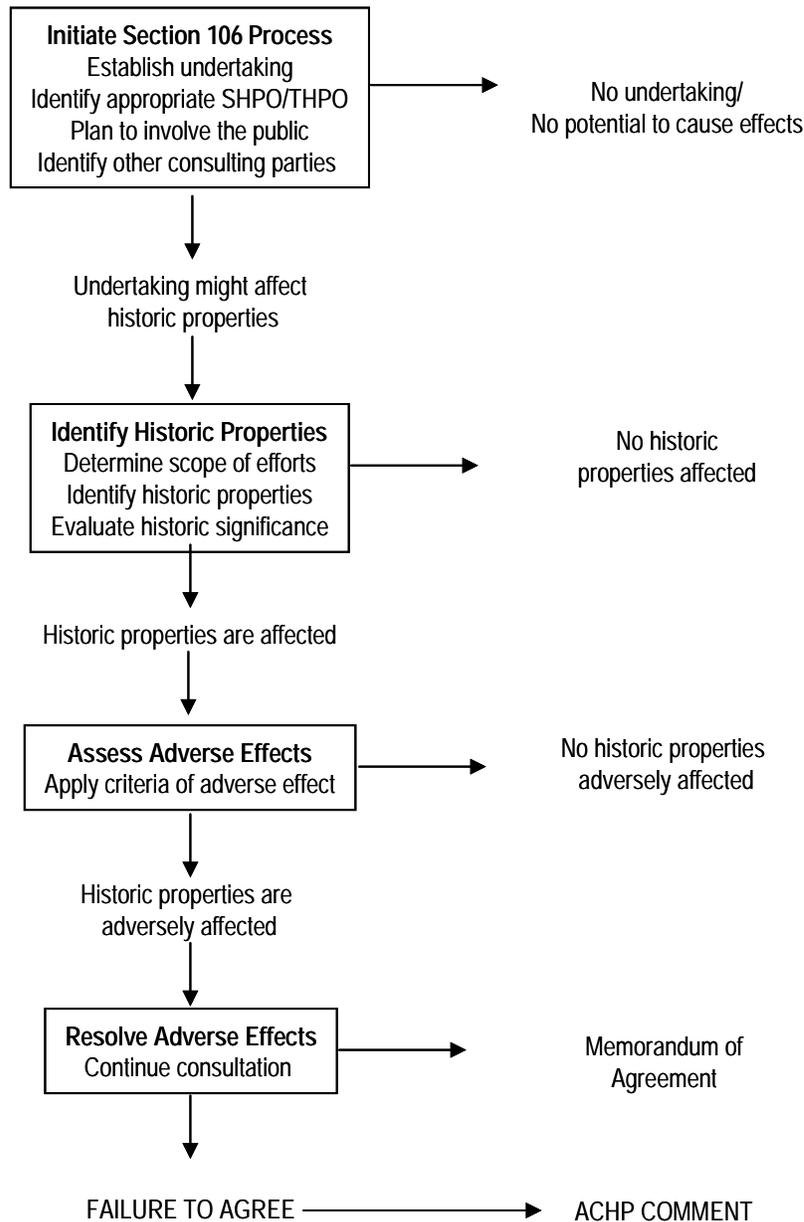


Figure 4-1 Section 106 Flowchart.

Adapted from “Section 106 Regulations Flow Chart,” (ACHP 2001). The Section 106 process should be integrated into the NEPA process, and the results of the process should be indicated in the NEPA documentation.

Identify Consulting Parties

- **SHPO/THPO.** CSSA has the responsibility to properly identify the appropriate SHPO and/or THPO that must be consulted (800.3 (c)). Under most circumstances, this will be the SHPO within the THC.

If the undertaking is on or affects historic properties on tribal lands, then CSSA must determine what tribe is involved and whether the tribe has assumed the SHPO's responsibilities for Section 106 under Section 101(d)(2) of the NHPA. A list of such tribes is available from the Bureau of Indian Affairs (BIA) (included in Table 4.2). Tribes historically associated with the geographic area include the Comanche nation, the Mescalero Apache, the Lipan Apache Band of Texas, and the Tap Pilam Coahuiltecan Nation. Interested parties should consult the BIA website (BIA 2004). The THPO may assume the role of the SHPO on tribal land. Certain owners of property on tribal lands can request SHPO involvement in addition to the THPO in a Section 106 case in accordance with NHPA.

Other related points include the following. The manner of consultation may vary depending on CSSA's planning process, the nature of the undertaking, and the nature of its effects. Failure of a SHPO/THPO to respond within the time frames set by the regulation permit CSSA to assume concurrence with the finding or to consult about the finding or determination with the ACHP in the SHPO/THPO's absence. Subsequent involvement by the SHPO/THPO is not precluded, but the SHPO/THPO cannot reopen a finding or determination that it failed to respond to earlier.

- **Public.** The CSSA must decide early how and when to involve the public in the Section 106 process. A formal "plan to involve the public" (800.3(e)) is not required, although that might be appropriate depending upon the scale of the undertaking and the magnitude of its effects on historic properties. Potential interested parties for CSSA projects are listed in Table 4.1.
- **Other.** The Installation Manager, at an early stage of the Section 106 process, is required to consult with the SHPO to identify other organizations and individuals who will have the right to be consulting parties under the terms of the regulations (800.3(f)). These may include local governments, Indian tribes, and applicants for federal assistance or permits. Others may request to be consulting parties, but that decision is ultimately up to the CSSA.

The Installation Manager can combine individual steps in the Section 106 process with the consent of the SHPO (800.3(g)). Doing so must protect the opportunity of the public and consulting parties to participate fully in the Section 106 process as envisioned in Section 800.2.

4.4.1.2 Step 2: Identify Historic Properties (800.4)

The step known as "identification" includes preliminary work, actual efforts to identify properties, and an evaluation of identified properties to determine whether they are "historic;" *i.e.*, they are listed in, or eligible for inclusion in, the NRHP.

Determine scope of efforts (800.4(a)). At the beginning stages of the identification process, the Installation Manager must consult with the SHPO on the scope of its identification efforts and to fulfill steps (1) through (4). These steps include (1) determining and documenting the APE; (2) reviewing existing information about historic properties; (3) seeking information from

parties likely to have knowledge of or concerns about the area; and (4) gathering information from Indian tribes about properties to which they attach religious and cultural significance, while remaining sensitive to any concerns they may have about the confidentiality of this information. As mentioned previously, the APE is “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties” (800.16(d)). The APE can be influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.

Examples of areas that should be determined to be within the APE are:

- Areas where land will be disturbed;
- Areas from which the undertaking will be visible;
- Areas that may be subject to changes in noise level;
- Areas where land use changes may occur if the new use could affect historic properties; and
- Buildings or structures that may be modified.

The SHPO should be consulted at all steps in the scoping process. Where CSSA is engaged in an action that is on or may affect ancestral, aboriginal, or ceded lands, CSSA must gather information from Indian tribes regarding properties that may be of traditional religious and cultural significance to them, and that may be eligible for inclusion on the NRHP, on such lands.

Identify historic properties (800.4(b)). **This section sets out the steps the Installation Manager must follow to identify historic properties. Reminders throughout the section emphasize the need for consultation with various parties.** The standard for identification is a “reasonable and good faith effort” to identify historic properties, depending on a variety of factors (including, but not limited to, previous identification work) (800.4(b)(1)). Appropriate identification may include background research, consultation, oral history interviews, sample field investigation, and field survey.

Phased identification may be done when alternatives under consideration consist of corridors or large land areas, or where access to properties is restricted, and the nature of the undertaking and its potential scope and effect have, therefore, not yet been completely defined (800.4(b)(2)). Final identification and evaluation may also be deferred if provided for in an agreement with the SHPO or other circumstances. Under this approach, the Installation Manager is required to follow up with full identification and evaluation once project alternatives have been refined or access has been gained to previously restricted areas. Any further deferral of final identification would complicate the process and jeopardize an adequate assessment of effects and resolution of adverse effects.

Evaluate historic significance (800.4(c)). This section sets out the process for determining NRHP eligibility of properties not previously evaluated for historic significance. CSSA is required to apply the National Register Criteria to properties identified in the APE, and to acknowledge the special expertise of Indian tribes when assessing the eligibility of a property to which they attach religious and cultural significance (800.4(c)(1)). Previous determinations of eligibility may need to be re-evaluated due to the passage of time or other factors (e.g., properties constructed in the Cold War-era).

Determinations of eligibility are made in consultation with the SHPO (800.4(c)(2)). If CSSA and the SHPO agree that a property is eligible for inclusion on the NRHP, it is considered eligible for purposes of Section 106. Likewise, if the CSSA and the SHPO agree that a property is not eligible, then it is considered not eligible for inclusion on the NRHP for purposes of Section 106. If CSSA and the SHPO disagree concerning eligibility of a property, or if the ACHP requests it, CSSA will request a determination from the Keeper of the NRHP. If an Indian tribe disagrees with a determination of eligibility involving a property to which it attaches religious and cultural significance, then the tribe can ask the ACHP to request that the CSSA obtain a determination of eligibility. The intention is to provide a way to ensure appropriate determinations regarding properties located off tribal lands to which tribes attach religious and cultural significance.

No historic properties affected (800.4(d)(1)). If no historic properties are found or no effects on historic properties are found, the CSSA provides appropriate documentation (see Section 4.3.2.7) to the SHPO and notifies consulting parties. Members of the public need not receive direct notification, but CSSA must place its documentation in a public file prior to approving the undertaking, and provide access to the information when requested by the public.

Once adequate documentation is received, the SHPO has 30 days to object to the determination. The ACHP may also object on its own initiative within the time period. Lack of such objection within the 30-day period means that the agency has completed its Section 106 responsibilities.

The documentation requirements of a finding of “no historic properties affected” is listed below (800.11).

- Description of the undertaking, specifying the federal involvement, and its APEs, including photos, maps, and drawings, as necessary.
- Description of the steps taken to identify historic properties, including, as appropriate, efforts to seek information pursuant to 800.4(b).
- The basis for determining that no historic properties are present or affected.

Historic properties are affected (800.4(d)(2)). CSSA must proceed to the assessment of adverse effects when it finds that historic properties may be affected. CSSA will consider proceeding to the assessment of adverse effects if the SHPO or the ACHP objects to a no historic properties affected finding, but is no longer required to do so per a federal district court ruling on 36 CFR 800. “The court invalidated two subsections of the Section 106 regulations insofar as they allowed ACHP to effectively reverse a federal agency’s findings of “no historic properties affected” (Section 800.4(d)(2)) and “no adverse effects.” (Section 800.5(c)(3)) (ACHP 2002). Interim guidance from the ACHP for the two provisions of 36 CFR 800 invalidated by the court can be found at the ACHP web site (ACHP 2004). CSSA must notify all consulting parties and invite their views.

4.4.1.3 Step 3: Assess Adverse Effects (800.5)

Apply criteria of adverse effect (800.5(a)). The SHPO, and Indian tribes attaching religious and cultural significance to identified properties, must be consulted when agencies apply the criteria of adverse effect. CSSA must also consider the views of consulting parties and the public.

Adverse effects occur when an undertaking may directly or indirectly alter characteristics of a historic property that qualify it for inclusion on the NRHP (800.5(a)(1)). Reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or cumulatively, also need to be considered.

Examples of adverse effects include physical destruction or damage; alteration not consistent with the Secretary of the Interior's Standards; relocation of a property; change of use or physical features of a property's setting; visual, atmospheric, or audible intrusions; neglect resulting in deterioration; or transfer, lease, or sale of a property out of federal ownership or control without adequate protections (800.5(a)(2)).

If a property is restored, rehabilitated, repaired, maintained, stabilized, remediated or otherwise changed in accordance with the Secretary of the Interior's Standards, then it will not be considered an adverse effect. Where properties of religious and cultural significance to Indian tribes are involved, neglect and deterioration may be recognized as qualities of those properties and, thus, may not necessarily constitute an adverse effect.

If a property is transferred, leased, or sold out of federal ownership with proper preservation restrictions, then it will not be considered an adverse effect as in the current regulations. Transfer between federal agencies is not an adverse effect *per se*; the purpose of the transfer should be evaluated for potential adverse effects, so they can be considered before the transfer takes place.

Alteration or destruction of an archaeological site is an adverse effect, whether or not recovery of archaeological data from the site is proposed.

Section 800.5(a)(3) allows flexibility in federal agency decision making processes and recognizes that phasing of adverse effect determinations, like identification and evaluation, is appropriate in certain planning and approval circumstances, such as the development of linear projects where major corridors are first assessed and then specific route alignment decisions are made subsequently.

The SHPO may suggest changes in a project or impose conditions so that adverse effects can be avoided and thus result in a no adverse effect determination (800.5(b)). This provision also acknowledges that the practice of "conditional no adverse effect determinations" is acceptable.

The ACHP typically does not review "no adverse effect determinations" on a routine basis (800.5(c)). The ACHP may intervene and review no adverse effect determinations consistent with policy outlined in Appendix A to 36 CFR 800 or 36 CFR 800.6(a)(1). If Indian tribes disagree with the finding, they can request the ACHP's review directly, but this must be done within the 30-day review period.

If the SHPO fails to respond to CSSA's finding within the 30-day review period, then CSSA can consider that the SHPO is in agreement with the finding. When a finding is submitted to the ACHP, it will have 15 days for review; if it fails to respond within the 15 days, then the Installation Manager may assume ACHP concurrence with the finding. When it reviews no adverse effect determinations, the ACHP will limit its review to whether or not the criteria have been correctly applied. CSSA must proceed with consultation based on the ACHP's determination (36 CFR 800.5(c)(3)).

- **No historic properties are adversely affected (800.5(d)(1))** CSSA must retain records of their findings of no adverse effect and make them available to the public. The public

should be given access to the information when they so request, subject to Freedom of Information Act (FOIA) and other statutory limits on disclosure, including the confidentiality provisions in Section 304 of the NHPA. Failure of CSSA to carry out the undertaking in accordance with the finding requires the Installation Manager to reopen the Section 106 process and determine whether the altered course of action constitutes an adverse effect.

- **Historic properties are adversely affected (800.5(d)(2))** A finding of adverse effect requires further consultation on ways to resolve it.

The documentation requirements for a finding of “No Adverse Effect” or “Adverse Effect” are listed below (800.11).

- Description of the undertaking, specifying the federal involvement, and its APEs, including photographs, maps, and drawings, as necessary.
- Description of the steps taken to identify historic properties.
- Description of the affected historic properties, including information on the characteristics that qualify them for the NRHP.
- Description of the undertaking’s effects on historic properties.
- Explanation of why the criteria of adverse effect were found applicable or inapplicable, including any conditions or future actions to avoid, minimize, or mitigate adverse effects.
- Copies or summaries of any views provided by consulting parties and the public.

4.4.1.4 Step 4: Resolve Adverse Effects (800.6)

Continue consultation. When adverse effects are found, the consultation must continue between CSSA, the SHPO and consulting parties to attempt to resolve them (800.6(a)(1)). The Installation Manager must notify the ACHP when adverse effects are found and should invite the ACHP to participate in the consultation when the circumstances in 800.6(a)(1)(i)(A)-(C) exist. A consulting party may also request the ACHP to join the consultation. The ACHP will decide on its participation within 15 days of receipt of a request, basing its decision on the criteria set forth in Appendix A to Part 800. Whenever the ACHP decides to join the consultation, it must notify the CSSA and the consulting parties. It must also advise the Manager of the CSSA of its decision to participate. This is intended to keep the decision makers at the policy level of CSSA apprised of those cases that the ACHP has determined present issues significant enough to warrant its involvement.

New consulting parties may enter the consultation if the CSSA and the SHPO (and the ACHP, if participating) agree (800.6(a)(2)). If they do not agree, it is desirable for them to seek the ACHP’s opinion on the involvement of the consulting party. Any party, including applicants, licensees, or permittees that may have responsibilities under a MOA, must be invited to participate as a consulting party.

The Installation Manager is obligated to provide project documentation to all consulting parties at the beginning of the consultation to resolve adverse effects (800.6(a)(3)), subject to confidentiality provisions outlined in 36 CFR 800.11(c)(1).

CSSA must provide an opportunity for members of the public to express their views on an undertaking (800.6(a)(4)). The provision embodies the principles of flexibility, relating CSSA efforts to various aspects of the undertaking and its effects upon historic properties. CSSA must provide the public notice to allow enough time and information to meaningfully comment.

If all relevant information was provided at earlier stages in the process in such a way that a wide audience was reached, and no new information is available at this stage in the process that would assist in the resolution of adverse effects, then a new public notice may not be warranted. However, this presumes that the public had the opportunity to make its views known on ways to resolve the adverse effects.

Although it is in the interest of the public to have as much information as possible to provide meaningful comments, information may be withheld in accordance with Section 304 of the NHPA (800.6(a)(5)). Section 304 of NHPA provides that information may be withheld to protect a historic property from damage, for example. Particular attention is given to the confidentiality concerns of Indian tribes.

Memorandum of Agreement (800.6(b)). When resolving adverse effects without the ACHP, the Installation Manager consults with the SHPO and other consulting parties to develop an MOA (800.6(b)(1)). If this is achieved, the agreement is executed between CSSA and the SHPO and filed with required documentation with the ACHP. This filing is the formal conclusion of the Section 106 process and must occur before the undertaking is approved. Standard treatments adopted by the ACHP may set expedited ways for completing MOAs in certain circumstances.

In completing an MOA, CSSA files the following listed support documentation with the ACHP (800.11).

- Any substantive revisions or additions to the documentation provided to the ACHP pursuant to 800.6(a)(1).
- Evaluation of any measures considered to avoid or minimize adverse effects of the undertaking.
- Summary of the views of consulting parties and the public.

If the ACHP is not a part of the consultation, then a copy of the executed MOA and the support documentation specified in 36 CFR 800.11(f) must be sent to the ACHP for its files. This does not provide the ACHP an opportunity to reopen the specific case, but may form the basis for other actions or advice related to an agency's overall performance in the Section 106 process.

When the ACHP is involved, the consultation proceeds in the same manner, but the MOA must be signed by CSSA, the SHPO and the ACHP (800.6(b)(2)).

An MOA evidences CSSA's compliance with Section 106, and the agency is obligated to follow its terms as it is legally enforceable (800.6(c)). Failure to do so requires CSSA to reopen the consultation process and bring it to suitable closure as required by Section 106 regulations. The reference to Section 110(l) of the NHPA is intended to conform the streamlining provisions of these regulations to current statutory requirements, pending amendment of that section.

The rights of signatories to an agreement are spelled out, along with who is required to sign the agreement under specific circumstances (800.6(c)(1)). The term "signatory" has a special

meaning as described in this section. A signatory is able to execute, amend or terminate the MOA. The term does not include others who sign the agreement as concurring parties.

Certain parties may be invited to be signatories in addition to those specified in Section 800.6(c)(1-2). They include individuals and organizations that should, but do not have to, sign agreements. It is particularly desirable to have parties who assume obligations under the agreement to become formal signatories. Once invited signatories sign MOAs, they have the same rights to terminate or amend the MOA as other signatories.

Other parties may be invited to concur in agreements (800.6(c)(3)). They do not have the rights to amend or terminate an MOA, however. Their signature simply shows that they are familiar with the terms of the agreement and agree with its provisions.

Sections 800.6(c)(4)—(9) set forth specific features of an MOA and the way it can be terminated or amended.

Failure To Resolve Adverse Effects (800.7). When consulting parties cannot reach agreement, the process may be terminated by any of the parties. Usually when consultation is terminated, the ACHP renders advisory comments to the head of the agency, which must be considered when the final CSSA decision on the undertaking is made, although there may be circumstances where the ACHP will recommend further discussion to resolve the matter.

- **CSSA Terminates Consultation** The head of the agency or an Assistant Secretary or officer with major department-wide or agency-wide responsibilities must request ACHP comments when the CSSA terminates consultation (800.7(a)(1)). Section 110(l) of the NHPA requires heads of agencies to document their decision when an agreement has not been reached under Section 106.
- **SHPO Terminates Consultation** The ACHP and CSSA may conclude the Section 106 process with an MOA between them if the SHPO terminates consultation (800.7(a)(2)).
- **THPO Terminates Consultation** If the THPO terminates consultation regarding an undertaking on or affecting tribal lands, the ACHP will issue comments. This provision respects the tribe's unique sovereign status with regard to its lands.
- **ACHP Terminates Consultation** In cases where the ACHP terminates consultation, the ACHP has the duty to notify all consulting parties prior to commenting (800.7(a)(4)). The role given to the Federal Preservation Officer is intended to fulfill the NHPA's goal of having a central official in each agency to coordinate and facilitate the agency's involvement in the national historic preservation program.

The ACHP may provide advisory comments even though it has signed an MOA (800.7(b)). This provision is intended to give the ACHP the flexibility to provide comments even where it has agreed to sign an MOA. Such comments might elaborate upon particular matters or provide suggestions to federal agencies for future undertakings.

The ACHP has 45 days to provide its comments to the head of the agency for a response by the agency head (800.7(c)). When submitting its comments, the ACHP will also provide the comments to the Federal Preservation Officer, among others, for information purposes.

The Agency head takes the ACHP's comments into account in reaching a final decision, documents this decision, and prepares a summary of the rationale with evidence of consideration

of the ACHP's comments, and provides it to the ACHP prior to approving the undertaking. The Agency head also provides a copy of the summary to all consulting parties, notifies the public, and makes the record available for public inspection (800.7(c)(4)).

If CSSA requests the ACHP's comment without an MOA, CSSA files the following listed documentation with the ACHP (800.11).

- Description and evaluation of any alternatives or mitigation measures that the Agency Official proposes to resolve the undertaking's adverse effects.
- Description of any reasonable alternatives or mitigation measures that were considered but not chosen, and the reasons for their rejection.
- Copies or summaries of any views submitted to the Agency Official concerning the adverse effects of the undertaking on historic properties and alternatives to reduce or avoid those effects.
- Any substantive revisions or additions to the documentation provided the ACHP pursuant to 800.6(a)(1).

4.4.1.5 Emergency Conditions

Subpart B of the ACHP regulations makes special provisions in 36 CFR 800.12 for agency actions undertaken in response to an "officially declared" emergency situation. For the special provisions to apply, CSSA action would be required within 30 days of the emergency. CSSA may request an extension of the period of applicability from the ACHP prior to the expiration of the 30 days. Immediate rescue and salvage operations conducted to preserve life or property are exempt from the provisions of Section 106. In an emergency, CSSA can choose one of two possible courses of action listed below.

- Follow a PA developed pursuant to Section 800.14(b) that contains specific provisions for dealing with historic properties in emergency situations.
- If CSSA proposes an emergency action as an essential and immediate response to a disaster declared by the President or a governor, CSSA will notify the ACHP, the SHPO and any Indian tribe that may attach religious and cultural significance to historic properties likely to be affected prior to the undertaking and afford them an opportunity to comment within 7 days of notification. If the Installation Manager determines that circumstances do not permit 7 days for comment, the Installation Manager will notify the ACHP, the SHPO, and the Indian tribe and invite any comments within the time available.

4.4.1.6 Unexpected Late Discoveries

Late discovery happens most often with projects that involve excavation or other ground-disturbing activities, although sometimes it involves late discovery of unforeseen effects on a known historic property. Regulations in 36 CFR 800.13 provide three alternatives for action in the case of late discoveries. Archaeological finds will normally be treated under Option 2; unanticipated effects to buildings will be considered under Options 1 or 3. If historic properties are discovered or unanticipated effects on historic properties are found after CSSA has completed the Section 106 process without establishing a process under Section 800.13(a), CSSA will follow the procedures listed below.

- Make reasonable efforts to avoid, minimize, or mitigate adverse effects to such properties.
- If CSSA has not approved the undertaking or if construction on an approved undertaking has not commenced, consult to resolve adverse effects pursuant to Section 800.6.
- If CSSA, the SHPO, and any Indian tribe that might attach religious and cultural significance to the affected property agree that such property is of value solely for its scientific, prehistoric, historic, or archaeological data, the Installation Manager may comply with the Archaeological and Historic Preservation Act instead of the procedures in this part and provide the ACHP, the SHPO, and the Indian tribe with a report on the actions within a reasonable time after they are completed.
- If CSSA has approved the undertaking and construction has commenced, determine actions that CSSA can take to resolve adverse effects, and notify the SHPO, any Indian tribe that might attach religious and cultural significance to the affected property, and the ACHP within 48 hours of the discovery. The notification shall describe the actions proposed by the CSSA to resolve the adverse effects. The SHPO, the Indian tribe, and the ACHP will respond within 48 hours of the notification, and CSSA will take into account their recommendations and carry out appropriate actions. CSSA will provide the SHPO, the Indian tribe, and the ACHP a report of the actions when they are completed.

If a late discovery involves a Native American cultural item as defined by NAGPRA—that is, a grave or other human remains, objects associated with a grave, unassociated funerary objects, sacred objects, or objects of the cultural patrimony of a Native American group—CSSA will comply with Section 3(d) of NAGPRA. At present, this means that CSSA will stop work for 30 days, during which time it consults with appropriate Native American groups and with the SHPO.

4.4.1.7 Summary

Once CSSA has completed the Section 106 process according to Steps 1 through 4 above, it can proceed with the undertaking. The actions under these steps vary depending on the effect on cultural resources, as outlined above and summarized below.

No Undertaking: Action proceeds with no further consultation. The Installation Manager keeps appropriate records on file in case members of the public or other parties raise questions at a later date.

No Historic Properties Present or No Effect: Action proceeds after the Installation Manager provides appropriate documentation to the SHPO and there are no objections within 30 days. Members of the public need not receive direct notification, but CSSA must place its documentation in a public file and provide access to the information when requested by the public.

No Adverse Effect: Action proceeds after the Installation Manager proposes No Adverse Effect finding to the SHPO and notifies all consulting parties, and the SHPO agrees or fails to respond within 30 days. The CSSA ensures the action is carried out in accordance with any agreed-upon conditions. CSSA must retain records of its finding and make them available to the public upon request.

Adverse Effect and MOA Executed: If the action is an Adverse Effect and an MOA is executed concerning the mitigation of adverse effects, CSSA proceeds with its undertaking under the terms of the MOA. If the ACHP was not a signatory, CSSA submits a copy of the executed MOA, along with documentation to the ACHP prior to approving the undertaking.

Adverse Effect Without MOA. The project may proceed after the ACHP renders advisory comments to the agency head, with a copy to the Federal Preservation Officer and others. The CSSA Installation Manager takes the ACHP's comments into account in reaching a final decision, documents this decision and prepares a summary of the rationale with evidence of consideration of the ACHP's comments, and provides it to the ACHP prior to approving the undertaking. The CSSA Installation Manager also provides a copy of the summary to all consulting parties, notifies the public, and makes the record available for public inspection.

4.5 Economic Analysis

AR 200-1 requires the installation to consult under section 106 of the NHPA for any historic buildings and structures being considered for demolition and replacement. Any demolition or disposal action will most likely involve the Public Works. By including the CRM at all scheduled meetings, an opportunity to identify the necessity of economic analysis early in the planning stages of a project will be established, thereby reducing delays and redesigns of projects found not to conform to the Secretary of the Interior's Standards (36 CFR 67; NPS).

The NHPA requires that historic properties be considered for reuse to the maximum extent feasible before considering their disposal. The decision to reuse, replace, or demolish a facility needs to be justified with a least cost, life/cycle economic analysis. This same approach should be considered when major character-defining elements (*e.g.*, windows, doors) are replaced with new materials. A number of computer software programs are currently available for this purpose. The AEC and the Construction Engineering Research Laboratory (CERL) have developed a computer-based analysis (Layaway Economic Analysis [LEA]) for buildings that allows the input and manipulation of costs associated with repairs, maintenance, demolition, and replacement of buildings. The LEA tool also has components that allow for adjustments for National Register properties. Defense Environmental Network and Information Exchange (DENIX) users may download LEA software (US AEC 2004).

As a general rule, when economic analysis demonstrates that rehabilitation costs exceed 70 percent of replacement costs, replacement construction may be justified. However, the 70 percent value may be exceeded where the significance of a particular historic structure warrants special attention, or if warranted by the life/cycle comparisons. The initial cost of buildings is only a fraction of the long-term cost of ownership and operation. The true cost of new construction must include not only the associated labor and materials, but demolition and disposal costs, re-landscaping, cost and associated time for environmental reviews, long-term costs, life/cycle costs, utility costs, replacement costs, and other pertinent factors. Generally, replacement costs should not be based on replacement in kind, but on a design that is architecturally compatible with the historic property, unless the feature is critical to the integrity of the historic building.

4.6 PUBLIC INVOLVEMENT PLAN

Federal regulations require that CSSA involve the interested public in the Section 106 Process (36 CFR 800.2(d)). The public's views must be sought and considered in a manner that reflects:

- The nature and complexity of the undertaking and its effects on historic properties;
- The likely interest of the public in the effects on historic properties;
- Confidentiality concerns of private individuals and businesses; and
- The relationship of the federal involvement to the undertaking (36 CFR 800.2(d)(1)).

CSSA shall provide the public with information on an undertaking and its effects on historic properties and seek comment and input (36 CFR 800.2(d)(2)). Exceptions are allowed to protect the confidentiality of affected parties. Members of the public are also allowed to take the initiative to provide comments on their own for the CSSA to consider. Established procedures of the CSSA for public involvement under NEPA may be substituted for the Section 106 process public involvement requirements if they provide "adequate opportunities for public involvement" consistent with the Section 106 process as described in 36 CFR 800.3 through 800.13 (35 CFR 800.2(d)(3)).

The area west of CSSA is primarily rural and zoned for residential use, and residential and commercial development is occurring nearby. The density of residential development west and south of the installation is increasing as San Antonio expands to the north and northwest. Communities near CSSA include Fair Oaks to the west and northwest and Leon Springs to the south. Boerne, Texas lies about 10 miles northwest of the post. The subdivisions of The Dominion, Cross Mountain Ranch, Summit Oaks, Hidden Springs, and Grey Oaks were developed near CSSA from 1980 into the 1990s.

CSSA relies on Fort Sam Houston for public affairs office (PAO) support. Sections 4.6.1 through 4.6.3 list groups that may have an interest in cultural resources management at CSSA.

4.6.1 Alamo Area Council of Governments

The Alamo Area Council of Governments (AACOG) has entered into an MOA with Fort Sam Houston and other military installations in the San Antonio area for mutual review and comment on planning and environmental documents. AACOG also prepared the Camp Bullis Joint Land Use Study (AACOG 1995), which contains information relevant to CSSA.

4.6.2 Hunters

Hunting and fishing is allowed on CSSA for current civilian personnel, their immediate relatives, and guests of the Installation Manager. About 20 hunters use the installation each year, primarily for white-tailed and axis deer. Hunting turkey, dove, duck, quail, and small game (rabbits, squirrels, raccoons, coyotes, *etc.*) is also permitted. These hunters are required to volunteer their time for habitat improvement measures on the facility. Hunters must observe the guidelines and requirements of the Texas Parks and Wildlife Department, and CSSA. The interests of these hunters are represented by the Wildlife Management Committee, which has established the Hunting Standing Operating Procedure (SOP) for the installation. The Hunting SOP specifies how, when, and where hunting occurs on the post, and how hunting areas are to be

used in terms of access, safety, and cleanup. Currently, hunters are not informed of the possibility that they may encounter cultural resources on the post, how to avoid or protect such resources, the penalties for such actions, or what to do if they observe damage to or destruction of these resources. Incorporation of a statement about cultural resources in the Hunting SOP is therefore recommended as an appropriate Cultural Resource Goal for the facility CRM.

4.6.3 Neighbors

In addition to Camp Bullis, CSSA's neighbors include various residential developments (*e.g.*, The Dominion, Cross Mountain Ranch, Summit Oaks, Hidden Springs, Grey Oaks). Nearby towns include Fair Oaks to the west and northwest, Leon Springs to the south, and Boerne to the northwest.

The table below (Table 4.1) lists information for parties who may be contacted for public involvement. These groups may be involved under NEPA. While this is not an exhaustive list of potentially interested parties, it provides a basis for establishing contact with potentially interested members of the community. Non-federally recognized Native American tribes or groups are also considered interested parties, and are listed in Section 4.7.

Table 4.1. Potentially Interested Parties in the Area of CSSA

Name	Contact Name	Contact Information
Camp Bullis	Paul Dvorak, Installation Manager	HQ, Building 5000 Camp Bullis San Antonio, TX Phone: 210-295-7508
Bexar County Historical Commission	Virginia S. Nicholas	233 N. Pecos, Suite 420 San Antonio, TX 78207
Alamo Area Council of Governments	Dean Danos, Executive Director	8700 Tesoro Drive, Suite 700 San Antonio, TX 78217 Phone: 210-362-5200 Fax: 210-225-5937
City of Fair Oaks Ranch	Mr. John Hobson, City Manager	7286 Deitz Elkhorn Rd. Fair Oaks Ranch, TX 78015 210-698-0900; fax 210-698-3565
Jackson Woods Homeowners Association	Mr. Bruce Tschoepe	26655 Fawn Mountain Boerne, TX 78015
Leon Springs Homeowners Association	Ms. Iva Johnson	7507 Karen Skye Circle San Antonio, TX 78257-1124

4.7 Native American Consultation

CSSA must consult with federally recognized Native American tribes or groups pursuant to NHPA Section 110(a)(2) and 36 CFR Part 800.2 to identify, evaluate, and treat historic properties that have religious or cultural importance to those groups. Consultation with the NPS National NAGPRA program also may be necessary.

CSSA will ensure that consultations in compliance with 36 CFR 800 between CSSA and Native American tribes occur on a government-to-government basis in an open and candid manner. CSSA will document all consultations to demonstrate compliance. Under 36 CFR 800, and 43 CFR 10, CSSA's consultation obligations are with federally recognized tribes. In addition, 43 CFR 10 requires agencies to consult with known lineal descendants about any identified Native American remains or associated funerary objects. Lineal descendants for purposes of 43 CFR 10 could include members of non-federally recognized tribes. If Native American human remains are found at CSSA, CSSA must inform federally recognized Indian Tribes with an interest in CSSA. CSSA may also wish to notify potential lineal descendants through public notice of the find. Given the limited number of archaeological sites at CSSA, it is possible that Native American interest in the installation will be small. However, should tribes express interest or concern about known or potential resources at CSSA, further guidance on establishing consultation with such tribes is available. A consultation model for DoD agencies can be found online (Deloria and Stoffle 1998).

4.7.1 Native American Contacts

There are three federally recognized Native American tribes with potential interest in CSSA, the Mescalero Apache, located in New Mexico, the Tonkawa of Oklahoma, and the Comanche Nation of Oklahoma. Contact information for these tribes are included in Table 4.2. There are

two Native American tribes that may claim descent from residents of the CSSA area and have applied for federal recognition, the Lipan Apache Band of Texas and the Tap Pilam Coahuiltecan Nation, San Antonio, Texas. Points of contact for these tribes are listed along with other potentially interested parties in Table 4.2. CSSA's consultation obligations toward these groups are the same as for any member of the interested public.

Initial contact should be made in writing, followed by verbal contact. If the Mescalero Apache, the Tonkawa, or another federally recognized Indian Tribe expresses interest in the cultural resources of the CSSA installation, CSSA will add to this section new consultation procedures as they are developed in consultation with the Tribes.

Table 4.2. Native American Points of Contact

Name	Point of Contact (POC)	Contact Information
Federally Recognized Tribes		
Comanche Nation of Oklahoma	Chairman Wallace Coffey	HC-32, Box 1720 584 NW Bingo Road Lawton, Oklahoma 73502 580-492-4988; fax 492-3796 http://www.comanchenation.com Jimmy Arterberry, THPO P.O. Box 908 Lawton, OK 73502 580-595-9960, ext. 9618
Tonkawa Tribe of Indians of Oklahoma	Donald Patterson, Tribal President	1 Rush Buffalo Road Tonkawa, Oklahoma 74653-4449 580-628-2561; fax 628-9903 http://www.tonkawatribe.com/
Mescalero Apache Tribe	Frederick Chino, Sr., President	P.O. Box 227 Mescalero, NM 88340 575-464-4494; fax 464-9191 Holly Houghten, THPO P.O. Box 227 Mescalero, New Mexico 88340 575-464-3005 holly@mathpo.org
Potentially Interested Parties (Not Federally Recognized)		
Lipan Apache Band of Texas	Bernard F. Barcena, Jr. General Council Chairman	P.O. Box 5218 McAllen, Texas 78502 956-648-9336 contact@lipanapache.org
Tap Pilam Coahuiltecan Nation	Raymond Hernandez, Executive Director	1313 Guadalupe Street Suite 104 San Antonio, TX 78202 210-227-4940; fax 227-4966 aitinfo@aitscm.org

4.8 Points of Contact

The **SHPO** (THC) should be consulted whenever a proposed project will impact an NRHP eligible resource, or if Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony are found, or if potentially NRHP-eligible archaeological sites are found during an undertaking.

Bexar County Reviewer (Mr. Brad Jones 2014)	Ms. Elizabeth Brummet (2014)
Texas Historical Commission	Texas Historical Commission
Archaeology Division	Architectural Division
P.O. Box 12276	P.O. Box 12276
Austin, TX 78711-2276	Austin, TX 78711-2276
Phone (512) 463-5865	Phone (512) 463-6167
Fax (512) 475-4872	Fax (512) 463-6095

Mr William McWhorter (2014)
 Texas Historical Commission
 History Programs Division
 P.O. Box 12276
 Austin, TX 78711-2276
 512.463.5833
 Fax (512) 463-6095

The **TARL** may be contacted regarding curation of archaeological collections and field documentation. TARL also houses archived site files and reports.

Mr. Jonathan Jarvis, Director	Ms. Ardi Kalter, Head of Collections
TARL	TARL
The University of Texas at Austin	The University of Texas at Austin
1 University Station R7500	1 University Station R7500
Austin, TX 78712-0714	Austin, TX 78712-0714
Phone (512) 471-6007	Phone (512) 475-6853

The **Departmental Consulting Archaeologist of the NPS** should be contacted in the event that potentially NRHP-eligible archaeological remains are encountered during an undertaking according to the provisions of AHPA.

Erika Seibert, NRHP Archaeologist
 National Park Service
 1201 Eye St., NW
 8th Floor (MS 2280)

Washington, DC 20005
202.354.2217
erika_seibert@nps.gov

Federal Agency Preservation Assistance Program, Heritage Preservation Services,
National Park Service
1201 Eye St., NW, 2255, Washington, DC 20005
Phone: David Banks at (202) 354-6968; fax: (202) 371-1794
E-mail: nps_hps-info@nps.gov
Carol D. Shull

John M. Fowler, executive director
Advisory Council on Historic Preservation
Old Post Office Building
1100 Pennsylvania Avenue, NW, Suite 809
Washington, DC 20004
Phone: (202) 606-8503; Fax: (202) 606-8647/8672
E-mail: achp@achp.gov

Reid Nelson, director
Office of Federal Agency Programs
Phone: (202) 606-8505
Fax: (202) 606-5072
rmelson@achp.gov 202-606-8556

The Army has Federal Historic Preservation Officers who should be contacted for help drafting a curation agreement:

Mr. Hew Wolfe
Federal Preservation Officer
Deputy Assistant Secretary of the Army
Environment, Safety, and Occupational Health United States Army
Office of the Deputy Assistant Secretary
110 Army Pentagon Room 3D453
Washington, DC 20310-0110
Phone: 703-697-2014
Fax: 703.693.8149
E-mail: hew.wolfe@conus.army.mil

Army Staff POC:
Ms. Kathleen McLaughlin
Deputy Federal Preservation Officer
Department of Army
600 Army Pentagon

Washington, DC 20310-0600 (5B112A)
Phone: 571.256.9726
Fax: 571.256.3839
E-mail: kathleen.a.mclaughlin8.civ@mail.mil

Any evidence relating to specific individuals or actions that may constitute ARPA violations on CSSA land should be reported to the local office of the **CID**: the 25th MP Detachment at Fort Sam Houston, Texas:

Fort Sam Houston CID Office

25th MP Det (CID)
2164 Wilson Way, Building 268, Ste 59
Joint Base San Antonio
Fort Sam Houston, TX 78234
E-mail: usarmy.jbsa.usacidc.mbx.fsh-cid-office@mail.mil
COM: 210 221-1050/0050/1514
DSN: 471
FAX: 210-221-0728

SECTION 5 STANDARD OPERATING PROCEDURES

This section identifies SOP for conducting work on or around identified cultural resources on CSSA. SOPs are included for operations and maintenance, and for identifying historic properties and assessing effects. Procedures to be followed in the event that unanticipated archaeological material or human remains are identified during a project are discussed.

The SOPs for CSSA are intended to satisfy the requirements outlined in the *Secretary of the Interior's Standards for Rehabilitation and Historic Preservation Projects* (36 CFR 67 and 68). (Department of the Interior 1995). They identify procedures to ensure compliance with the Secretary's Standards and proper agency review. They are intended to be used by installation personnel involved in routine maintenance of buildings and ground disturbing activities in coordination with the CRM.

The potentially NRHP-eligible properties at CSSA include the archaeological sites listed in **bold** in Table 3.1, and the buildings and structures listed in Table 3.2.

SOP 1: OPERATIONS AND MAINTENANCE

Responsible Parties

Maintenance: CSSA Facilities Engineer Branch

Renovation or New Construction: Directorate for Contracting, CSSA Contract & Procurement Section/Logistics Support Division

Property Transfers: Real Property, McAlester Army Ammunition Plant

All Situations: CSSA Installation Manager (210) 295-7416; CSSA CRM (210) 698-5208

Triggering Events

Possible undertakings include, but are not limited to: plans to build, renovate, or conduct maintenance on buildings, transfer of buildings or property out of the CSSA, training activities that could result in ground disturbance or changes to a building or structure, or installation of underground utility lines that will involve ground disturbance when these projects involve federal property, funding, or permits. Continued use of existing facilities for their current uses is not an undertaking.

Procedures

1. Building Maintenance, Renovation, New Construction, Property Transfers:

a. Goal: Identify whether maintenance activity is an undertaking that needs to be reviewed by the CRM.

b. Tasks:

- Actions involving minor, routine maintenance and repair such as replacing light bulbs, or maintenance and repair of systems generally not visible (electrical systems, plumbing) do not require review by the CRM. Examples of projects, pending SHPO concurrence with this SOP, that would not be considered undertakings include:

Grounds maintenance;

Road and trail maintenance;

Minor building maintenance, including repair of electrical and heating systems;

Maintenance to buildings less than 50 years old, provided they do not qualify under the criteria consideration for properties achieving significance within the past 50 years; and

Demolition of World War II temporary wood buildings, per the 1986 PA between the DoD, ACHP, and the National Conference of SHPOs.

- If new ground disturbance in areas outside current roads, buildings, or utility lines is conducted, CRM review is necessary.
- Projects that require CRM review should be identified to the CRM as soon as possible to avoid project delays. Any additional cultural resources studies may require months to complete.

2. For all projects forwarded to the CRM for review, confirm there is an undertaking, and if so, define the APE. The APE is defined at 36 CFR § 800.16(d) as

“the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist. The APEs is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking.”

The size of the APE is determined on a case-by-case basis, and includes in its calculation the scale and nature of the undertaking. The APE should be logically linked to the project in question. A general rule, by no means inviolate, is that the size of the APE will be commensurate with the size of the project. Because definition of the APE includes both direct and indirect effect areas, it is entirely possible for a project to result in two APEs, one for indirect effects and one for direct effects, or even several APEs to cover multiple direct and indirect effects. APEs may be overlapping, contiguous or non-contiguous, or any combination thereof. Cumulative effects may also influence the final APE structure (King 2000).

Examples of kinds of effects that the CSSA may consider include:

- Physical changes to properties (*e.g.*, demolition, alteration);
- Visual effects (*e.g.*, adding an intrusive visual element to the scene);
- Auditory (*e.g.*, introducing intrusive noise into an environment);
- Land use (*e.g.*, facilitating development of a rural area near the installation boundaries); and/or
- Economic (*e.g.*, facilitating strip development outside installation access routes) (King 2000).

To determine the project APE and its potential to affect historic properties, the list below should be followed.

- Categorize the undertaking (repair and maintenance, ground-disturbing activity, *etc.*).

- Determine whether the effects typically associated with this category of undertaking are the expected effects for the project. Determine whether the scope and/or nature of the project might result in additional or other effects.
- Based on anticipated effect(s) determine where those effects might occur in relation to the project. The areas where effects might occur constitute the APE(s).
- Examine the APEs with respect to the anticipated effects to determine whether the undertaking activities are likely to affect historic properties (*i.e.*, ground disturbing activities in wooded areas are likely to disturb archaeological sites).
- Include all APE definitions on a project map.
- The CRM will review the determination and APE with the project proponent.

SOP 2: IDENTIFYING HISTORIC PROPERTIES AND ASSESSING EFFECTS

Responsible Parties

Specialized Studies Needed: CSSA Installation Manager (210) 295-7416; CSSA CRM (210) 698-5208

All Situations: CSSA CRM (210) 698-5208

Triggering Events

This SOP is followed if in following the procedures in SOP 1, CSSA finds that its proposed activity constitutes an undertaking.

Background

The following provides guidance for historic properties identification. The procedures are appropriate for the majority of projects conducted on CSSA property. Large-scale projects with multiple and far-reaching effects may require procedural modifications tailored specifically to the undertaking. All such modifications must be developed in consultation with the SHPO, THPO, and any other interested consulting parties. Identification surveys, whether conducted by qualified in-house personnel or by contract, will follow Texas guidelines, procedures, and methodologies.

The purpose of identification is to collect information about historic properties within an APE. All identification activities should be designed to achieve the preservation and management goals as defined above, as well as refine and/or add to the background information included in the PLS. Identification activities are grouped into three sets of procedures: pre-inventory preparation, field procedures, and integration of results. Pre-inventory preparation and results integration are the same for the identification of all expected historic property types and are discussed below. Field procedures for the identification of archaeological sites, historic buildings and structures, and properties of traditional religious and cultural importance differ and are discussed individually.

Procedures

1. CRM

Goal: Identify any historic properties that may be located within the APE defined in SOP 1, and assess whether the proposed undertaking will have an adverse effect on any such properties.

Tasks:

- For undertakings with an APE confined to CSSA property, the CRM will review the ICRMP and the CSSA Cultural Resources geographic information system (GIS) map to determine what additional studies may be necessary, and see that they are conducted in accordance with 36 CFR 800.4(b).
- For an APE that extends beyond CSSA boundaries, the review should be commensurate with the size and scale of the project. The review should establish whether the APE(s) has/have been surveyed previously or inspected to identify historic properties and to determine what property types are likely to be found in the APE(s). GIS data and/or predictive models, if available, may be consulted.
- If the area has been investigated previously, assess the quality of any collected data. For example, much of Camp Bullis has undergone archaeological surveys, and a number of archaeological resources have been identified near the boundaries with CSSA (Texas Archaeological Sites Atlas 2004).
- If the area has not been investigated or if it has been investigated but data quality is poor, further identification efforts will be required. Generally, data quality is considered poor if identification was carried out with obsolete methods or by unqualified individuals, or if only certain kinds of properties were considered.
- Determine whether the area of potential effect(s) is “large” or “small.” Generally, an area of more than 20 acres will be considered large. Determinations of size may be accomplished in consultation with the SHPO. Size will help determine the appropriate field identification method.
- Based on the size of the APE, PLS data, and/or predictive model results, does the collective data provide a basis for decision-making without additional identification activities? When the APE is small and high-quality data are available from a similar or adjacent area, or when comprehensive background data are available, it may be possible to extrapolate to or make inferences about the area in question without conducting a field identification survey. A decision at this step in the process not to proceed with further identification activities must have the concurrence of the SHPO, THPO, and other parties who have expressed an interest through the NEPA process.
- Determine survey strategy (reconnaissance, intensive, or a sampling strategy). There is no single survey technique that will fit every project. The scope and nature of the project, anticipated effects, and the property types predicted to be located within the APE-based on the review of background data will help determine the methodology for specific APEs. A single project that has multiple APEs, each representing a different type of effect or expected property type, will most likely require different field identification methods. Generally, a field survey may be characterized by two techniques: reconnaissance and intensive. Sampling is a form of predictive modeling generally reserved for “large” APEs.

Reconnaissance Survey. Reconnaissance surveys are most often used when it is questionable that historic properties exist within an area. Methods may include drives-through to look for standing historic structures, interviews with local residents, and archaeological inspection of sample tracts, coupled with appropriate background research. A reconnaissance

survey may result in the conclusion that historic properties are extremely unlikely, or that intensive surveys may be needed in a portion of the APE. Documentation for reconnaissance surveys include:

- The kinds of properties looked for;
- The boundaries of the area surveyed;
- The method of survey, including the extent of survey coverage;
- Specific properties that were identified, and the categories of information collected; and
- Surveyed areas that did not contain historic properties.

Intensive Survey. The size and complexity of the land area, whether the area is urban or rural, the types of properties expected, the ease or difficulty with which such property types can be identified, the extent of federal control over the lands involved, the ease or difficulty with which access can be obtained, and the nature of the projected effects contribute to the decision to conduct an intensive survey. Intensive survey methods are used to determine what specific historic properties are located within a defined area or to collect enough data on a specific historic property to allow for later evaluation. Intensive surveys reveal the actual types and distribution of properties within an APE, their location and condition, and their physical extent. Documentation for intensive surveys include:

- The kinds of properties looked for;
- The boundaries of the area surveyed;
- The method of survey and the extent of survey coverage;
- The precise location of identified properties; and
- Information regarding the appearance, significance integrity and boundaries of each property sufficient to permit an evaluation of its significance.

Sampling. Sampling may be used to estimate the cultural resources that might be located within the APEs of several project alternatives. Sampling may be random, stratified or systematic, and may be approached in stages so results of the initial large area survey are used to structure successively smaller, more intensive surveys. Sample type should be selected **based** on the research goals the survey is expected to contribute toward, the type of expected properties and the nature of the area to be surveyed. Sampling results in determination of the frequencies and types of properties identified within specific areas at various confidence levels. [NOTE: Predictive models are an instance of sampling where the number, classes, and frequencies of properties within surveyed areas are extrapolated to unsurveyed areas. Predictive models are effective tools for the early stages of planning an undertaking; however, the accuracy of any model must be confirmed with field testing. Written concurrence from the SHPO should be obtained before putting it into general use.]

- Prepare Research Design. Identification actions are essentially research activities for which a statement of objectives or research design is prepared before work is performed. The research design integrates identification with preservation and

management goals and PLS data. The research design, a written document, should include the list of requirements below.

Description of Undertaking. The research design should identify the categories of undertakings for which historic properties identification will be conducted during the coming fiscal year (FY). It should also graphically identify the project APE(s) (GIS if possible) for each undertaking.

Objectives. The objectives should reflect what is known about historic contexts or property types based on background research; should clearly define the physical boundaries of the area under investigation; and should specify the amount and types of information to be collected regarding historic properties in the area.

Methods. Research methodologies should be explicitly documented so that users of the collected data can assess possible limitations and biases. The methods should be compatible with the past and present environmental character of the area under study, expected property types, and state guidelines.

Expected results. Information from the PLS regarding the kinds of properties that exist in areas with similar environments or histories will allow predictions regarding the type, number, location, character, and condition of historic properties that may be expected within the project area. Information provided by the consulting parties during CSSA review and monitoring may suggest additional property types.

The research design may be developed for CSSA identification activities in consultation with the SHPO, THPO, and other interested parties. Once a research design is developed, it may be used repeatedly, with appropriate adaptations for specific projects or project types. The design must undergo periodic review and modification to take into account the results of subsequent inventories and locations of previously unidentified sites.

- Review of PLS Data and/or Additional Research. Before the actual field survey, a more specific review of existing data is generally undertaken. In the absence of a completed PLS, a review of the installation site and map files, previously developed historic contexts for the region, local histories, and any relevant information related to previous identification surveys or evaluations, should be reviewed.
- Once the CRM has determined (in consultation with the SHPO) what studies will be necessary to identify historic properties in the APE, the CRM will inform the project proponent of the time required to conduct the study, and will request the contracting officer to contract a study to parties or individuals who meet Secretary of the Interior's Professional Qualification Standards (36 CFR 61, Appendix A).
- Once the identification studies are carried out, the CRM will ensure that historical significance of any identified properties are evaluated in accordance with 36 CFR 800.4(c). Such evaluation will require the efforts of professional archaeologists or architectural historians who meet the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61, Appendix A).
- If evaluation shows that properties eligible for listing on the NRHP are within the APE, the CRM will assess the effects of the undertaking on the identified historic properties in accordance with 36 CFR 800.4(d).

- If the CRM finds that historic properties will be affected by the undertaking, the CRM will apply the criteria of adverse effect in accordance with 36 CFR 800.5.
- If the CRM finds that there will be an adverse effect, the CRM will continue to consult with the SHPO and THPO (as applicable) in accordance with 36 CFR 800.6, and SOP 3.

Procedures

1. Contracting Officer.

Goal: Contract qualified firm to conduct needed cultural resources studies.

Tasks:

- Develop a scope of work (SOW) in consultation with the CRM that takes into consideration recommendations made by the SHPO, THPO, and other interested parties concerning appropriate investigation needs.
- Include the SOW in Request for Proposals sent to firms that meet the Secretary of the Interior's Professional Qualifications Standards in accordance with 36 CFR 61, Appendix A.

SOP 3: UNANTICIPATED DISCOVERY

Typical Situations

Situation #1: Construction and maintenance activities, including, but not limited to digging, bulldozing, clearing-and-grubbing, maintaining earth berms, and roadwork conducted by CSSA personnel.

Situation #2: Construction and maintenance activities, including, but not limited to digging, bulldozing, clearing-and-grubbing, maintaining earth berms, and roadwork conducted by contractor.

Situation #3: Observation of eroded areas, gullies, dirt trails, road cuts, etc.

Responsible Parties

- Situations #1 and #2: Maintenance crews and foreman, construction crews, contractors, contracting officer, unit environmental officer.
- Situation #3: All installation staff and visitors, including hunters.
- All Situations: CSSA CRM (210) 698-5208; CSSA Chief of Security (210) 295-7408.

Triggering Events

Discovery of human bone, unmarked graves, artifacts (pottery, bone, or stone tools, and/or archaeological features).

Policy

In the event that archaeological deposits are encountered during any construction or excavation activities, the activity must stop, and the CSSA CRM must be notified. If bone is present within the deposit, the CSSA CRM will ensure that a qualified professional accompanies

him/her to the work site to assist in identification of the materials as human remains. Because of the potential for archaeological deposits to contain Native American human remains or cultural materials, failure to report discovery of archaeological deposits may result in violation of NAGPRA, ARPA, and other related federal and state laws resulting in fines and penalties against CSSA.

Procedures

Situation #1: Construction and maintenance activities, including, but not limited to digging, bulldozing, clearing-and-grubbing, maintaining earthen berms, and roadwork conducted by CSSA personnel.

1. CSSA Personnel

Goal: Protect location pending further instructions from supervisor.

Tasks:

- Immediately stop activity at the discovery location.
- Notify supervisor.
- Establish a 50-meter buffer around the location.
- Avoid the buffer zone. Stay on existing roads if traveling through the buffer zone.
- Await further instructions through the chain of command.

2. Supervisor

Goal: Implement protective measures pending instructions from CRM.

Tasks:

Ensure that personnel comply with the SOP.

- Immediately notify the CRM.
- Await further instructions from the CRM.
- Activities outside the buffer zone may proceed.

3. CRM

Goal:

Gather information.

Consult in accordance with statutes and policy.

Advise work supervisor.

Tasks:

- Notify the SHPO/THPO, potentially affiliated tribes cultural resources POC, and medical examiner (if required) in accordance with 36 CFR 800, NAGPRA, ARPA, and the AHPA.
- Give further instructions to the work supervisor.

- Evaluate the resource according to the procedures in SOP #2, as necessary, given consultation with the SHPO and THPO.
- If the remains are potentially eligible for the NRHP, the CRM will notify the Department Consulting Archaeologist (DCA) of the NPS, Archaeological Assistance Division in writing of the find, pursuant to the requirements of the AHPA (16 USC 469).

Departmental Consulting Archaeologist

Archaeological Assistance Division

National Park Service

800 North Capitol Street, NW, Suite 210

Washington, D.C. 20013

- Stoppage of work is not required by 36 CFR 800.13; however, the CRM should see that reasonable precautions are taken to avoid unnecessary impact to the identified resource.
- In accordance with 36 CFR 800.13(b)(2), if CSSA, SHPO, and interested tribes agree that the resource is of value solely for its scientific, prehistoric, historic, or archaeological data, CSSA may comply with AHPA instead of 36 CFR 800.13(b)(3), and provide the Council, the SHPO/THPO, and the Indian tribe with a report on the actions within a reasonable time after they are completed. Otherwise, CSSA will proceed in accordance with 36 CFR 800.13(b)(3).
- Pursuant to requirements of the AHPA, the CRM may request that the NPS record the information that is in danger of being lost, or may direct that this work be undertaken by a qualified archaeologist for CSSA.
- After notification, the NPS may undertake the recordation of information it feels is significant, and in danger of being lost after notifying CSSA in writing of its decision to do so.
- Any archaeological investigations carried out by CSSA on such archaeological sites will be carried out in consultation with the SHPO and under the direct supervision of an archaeologist who meets, at a minimum, the Secretary of Interior's Professional Qualification Standards (36 CFR 61, Appendix A).

CSSA will provide the SHPO, Indian tribes, and ACHP with a copy of the final report detailing the investigations.

Situation #2: Construction and maintenance activities, including, but not limited to digging, bulldozing, clearing-and-grubbing, maintaining earth berms, and roadwork conducted by CSSA contractors.

1. Contractor Supervisor

Goal: Protect location pending further instructions from Contracting Officer.

Tasks:

- Immediately stop activity at the discovery location.
- Notify the contracting officer.
- Establish a 50-meter buffer around the location.
- Avoid the buffer zone. Stay on existing roads if traveling through the buffer zone.
- Await further instructions through the chain of command.

2. Contracting Officer

Goal: Implement protective measures pending instructions from CRM.

Tasks:

- Ensure that personnel comply with the SOP.
- Immediately notify the CRM.
- Await further instructions from the CRM.
- Activities outside the buffer zone may proceed.

3. CRM

Goal:

Gather information.

Consult in accordance with statutes and policy.

Advise work supervisor.

Tasks:

- Notify the SHPO/THPO, potentially affiliated tribes cultural resources POC, and medical examiner (if required) in accordance with 36 CFR 800, NAGPRA, ARPA, and the AHPA.
- Give further instructions to the Contracting Officer.
- Evaluate the resource according to the procedures in SOP #2, as necessary given consultation with the SHPO and THPO.
- If the remains are potentially eligible for the NRHP, the CRM will notify the DCA of the NPS, Archaeological Assistance Division in writing of the find, pursuant to the requirements of the AHPA (16 USC 469).
- Stoppage of work is not required by 36 CFR 800.13; however, the CRM should see that reasonable precautions are taken to avoid unnecessary impact to the identified resource.
- In accordance with 36 CFR 800.13(b)(2), if the CSSA, SHPO, and interested tribes agree that the resource is of value solely for its scientific, prehistoric, historic or archaeological data, CSSA may comply with AHPA instead of 36 CFR 800.13(b)(3),

and provide the Council, the SHPO/THPO, and the Indian tribe with a report on the actions within a reasonable time after they are completed. Otherwise, CSSA will proceed in accordance with 36 CFR 800.13(b)(3).

- Pursuant to the requirements of the AHPA, the CRM may request that the NPS record the information in danger of being lost, or may direct this work be undertaken by a qualified archaeologist for CSSA.
- After notification, the NPS may undertake the recordation of information it feels is significant, and in danger of being lost after notifying the CSSA in writing of its decision to do so.
- Any archaeological investigations carried out by the CSSA on such archaeological sites will be carried out in consultation with the SHPO and under the direct supervision of an archaeologist who meets, at a minimum, the Secretary of Interior's Professional Qualification Standards (36 CFR 61, Appendix A).
- CSSA shall provide the SHPO, Indian tribes, and ACHP a copy of the final report detailing the investigations.

Situation #3: Observation of eroded areas, gullies, dirt trails, or road cuts.

1. Observer

Goal: Notify CRM of find.

Tasks:

- Leave artifacts in place, and carefully note location.
- Notify CRM of find location as soon as possible.

2. CRM

Goal:

Gather information.

Consult in accordance with statutes and policy.

Tasks:

- Investigate find location to determine whether it is a new find or associated with known resources.
- If a new find, notify the SHPO/THPO, potentially affiliated tribes cultural resources POC, and medical examiner (if required) in accordance with 36 CFR 800, NAGPRA, and ARPA.
- Evaluate the resource according to the procedures in SOP #2, as necessary given consultation with the SHPO/THPO.
- If the find is associated with an NRHP-eligible resource that is eroding or in other danger, develop and implement protection for the resource.

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**APPENDIX B: AR 200-1 (CHAPTER 6, CULTURAL RESOURCES), AND DOD
INSTRUCTION 4715.16**

Army Regulation 200-1

Environmental Quality

Environmental Protection and Enhancement

**Headquarters
Department of the Army
Washington, DC
13 December 2007**

UNCLASSIFIED

f. Maintain and archive records and reports on all pesticide applications and operations made to all facilities and grounds to include those performed under contract by tenant and supported activities, by lessees per formal agreements, those installations and facilities in the base realignment and closure (BRAC) cleanup program, and for closing overseas installations. (PD: DODI 4150.7)

g. Ensure installation self-help programs are cost-effective and promote IPM approaches for control of minor nuisance pests through use of authorized pest management materiel, equipment, awareness training, and record keeping requirements. (PD: DODI 4150.7)

h. Ensure requirements for aerial pesticide applications over Army lands to control pests of medical, economic, or other emergencies or urgencies of military significance are addressed in an aerial spray statement of need (ASSON) and submitted to the U.S. Army Environmental Command (USAEC), NGB-ARNG, IMCOM-Korea, or IMCOM-Europe as appropriate. (PD: DODI 4150.7)

i. Ensure pest management commercial solicitations incorporate Army requirements for the application and safe handling of pesticides and are forwarded to USAEC, NGB-ARNG, IMCOM-Korea or IMCOM-Europe as appropriate for technical review prior to solicitation. (PD: DODI 4150.7; DOD 4150.7-M; DOD 4150.7-P)

j. Appoint an installation pest management coordinator (IPMC). (PD: DODI 4150.7)

Chapter 6

Cultural Resources

6-1. Policy

Ensure that installations make informed decisions regarding the cultural resources under their control in compliance with public laws, in support of the military mission, and consistent with sound principles of cultural resources management.

6-2. Legal and other requirements

Statutes, laws, regulations, and other guidance applicable to the Army Cultural Resources Management Program include:

- a.* Section 470, Title 16, United States Code (16 USC 470).
- b.* Section 1996, Title 42, United States Code (42 USC 1996) and Executive Order (EO) 13007.
- c.* Section 3001, Title 25, United States Code (25 USC 3001).
- d.* Section 470aa-470mm, Title 16, United States Code (16 USC 470); Sections 431-433, Title 16, United States Code (16 USC 431-433); and Section 469, Title 16, United States Code (16 USC 469).
- e.* Part 79, Title 36, Code of Federal Regulations (36 CFR 79).
- f.* Part 800, Title 36, Code of Federal Regulations (36 CFR 800).
- g.* Part 229, Title 32, Code of Federal Regulations (32 CFR 229).
- h.* Part 10, Title 43, Code of Federal Regulations (43 CFR 10).
- i.* DOD American Indian and Alaska Native Policy Memorandum, 20 October 1998.
- j.* Presidential Memorandum for Heads of Executive Departments and Agencies, Government-to-Government Relations with Native American Tribal Governments, 29 April 1994.
- k.* EO 13175.
- l.* EO 13287.
- m.* For overseas installations, the country-specific FGS requirements.

6-3. Major program goal

Develop and implement procedures to protect against encumbrances to mission by ensuring that Army installations effectively manage cultural resources.

6-4. Program requirements

- a. General program management.*
 - (1) Develop integrated cultural resources management plans (ICRMPs) for use as a planning tool.
 - (2) Develop NHPA programmatic agreements (PAs) and memorandums of agreement (MOAs), Army alternate procedures (AAP) historic property component (HPC) plans, NAGPRA Comprehensive Agreements (CAs) and Plans of Action (POA), Cooperative Agreements, and other compliance documents as needed.
 - (3) Appoint a government (that is, Federal or State Army National Guard (ARNG)) employee as the installation cultural resources manager (CRM).
 - (4) Establish a government-to-government relationship with Federally recognized Indian Tribes, as needed. Initial formal government-to-government consultation with Federally recognized Indian Tribes will occur only between the

garrison commander (GC) or the Adjutant General (TAG) of an ARNG and the heads of tribal governments. Follow-on activities may be accomplished by staff.

(5) Establish a process that effects early coordination between the CRM and all staff elements, tenants, proponents of projects and actions, and other affected stakeholders to allow for proper identification, planning, and programming for cultural resource requirements.

b. National Historic Preservation Act compliance.

(1) Ensure that the GC functions as the agency official with responsibility for installation compliance with the National Historic Preservation Act (NHPA).

(2) Establish a historic preservation program, to include the identification, evaluation, and treatment of historic properties in consultation with the Advisory Council on Historic Preservation (ACHP), State Historic Preservation Officer (SHPO), local governments, Federally recognized Indian Tribes, Native Hawaiian organizations, and the public as appropriate. Document historic properties that will be substantially altered or destroyed as a result of Army actions. (LD: Section 110, NHPA; 36 CFR 800)

(3) Identify, evaluate, take into account, and treat the effects of all undertakings on historic properties. If an Army undertaking may affect properties of traditional religious or cultural significance to a Federally-recognized Indian Tribe, initiate consultation on a government-to-government basis. (LD: Section 106, NHPA; 36 CFR 800)

(4) Prepare and implement, as required, an NHPA Section 106 MOA, PA, or HPC, to address NHPA compliance for undertakings. Coordinate all NHPA compliance documents (for example, MOAs, PAs, HPCs) through the chain of command to obtain HQDA technical and legal review prior to execution. (LD: 36 CFR 800)

(5) Ensure that efforts to identify, evaluate, and treat historic properties consider the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, and are conducted under the supervision of personnel who meet applicable professional qualifications for undertaking such work. (LD: 36 CFR 61; Section 112, NHPA)

(6) Maintain an up-to-date listing of all historic properties, and where applicable, maintain historic status in conjunction with real property inventory and reporting guidelines. (LD: EO 13287)

(7) Withhold from public disclosure information about the location, character, or ownership of a historic property when the GC determines that disclosure may cause risk of harm to the historic property or may impede the use of a traditional religious site by practitioners. (LD: Section 304, NHPA)

(8) Consider alternatives for historic properties, including adaptive reuse, that are not needed for current or projected installation mission requirements. (LD: Section 111, NHPA)

(9) Nominate to the National Register of Historic Places (NRHP) only those properties that the Army plans to transfer out of Federal management through privatization efforts. Nominate other properties only when justified by exceptional circumstances. Avoid adversely affecting properties that are 50-years old or older that have not been evaluated for eligibility against NHPA criteria. Treat (assume) that all historic sites are eligible (that is, off-limits) until the SHPO concurs with the federal finding of non-eligible.

(10) Where disagreement occurs with the SHPO regarding the eligibility of a historic property for the NRHP, where applicable obtain a "Determination of Eligibility" from the Keeper of the National Register, National Park Service (NPS). (LD 36 CFR 800, 36 CFR 63)

(11) Undertake such planning and actions as may be necessary to minimize harm to any National Historic Landmark that may be directly and adversely affected as a result of Army actions. (LD: 36 CFR 800)

c. AIRFA, Executive Order 13007 and Executive Order 13175 compliance.

(1) Consult with Federally recognized Indian Tribes to provide access to sacred sites on Army installations. Consistent with appropriate health, safety mission constraints provide access to allow the practice of traditional religions, rights and ceremonies. The GC will maintain the appropriate confidentiality of sacred site locations. The GC may impose reasonable restrictions and conditions on access to sacred sites on Army installations for the protection of health and safety, or for reasons of national security. (LD: EO 13007)

(2) Avoid adversely affecting the physical integrity of sacred sites. Ensure reasonable notice is provided to Federally-recognized Indian Tribes when proposed actions may adversely affect or restrict access to the ceremonial use of, or the physical integrity of, sacred sites. (LD: EO 13007)

(3) Consult with tribal governments before taking actions that affect Federally recognized Indian Tribes. Assess the impact of Army plans, projects, programs, and activities on tribal trust resources and assure that tribal government rights and concerns are considered during the development of such plans, projects, programs and activities. (LD: EO 13175)

d. Native American Graves Protection and Repatriation Act compliance.

(1) Designate the GC as the Federal agency official with responsibility for installation compliance with Native American Graves Protection and Repatriation Act (NAGPRA). (LD: 43 CFR 10)

(2) Prepare CAs and POAs in coordination with Federally recognized Indian Tribes and Native Hawaiian organizations. Coordinate all NAGPRA CAs through the chain of command to obtain HQDA technical and legal review prior to execution. (LD: 43 CFR 10)

(3) Absent a CA, take reasonable steps to determine whether a planned activity (including MILCON) may result in the intentional excavation or inadvertent discovery of cultural items from Federally-owned or controlled Army lands. When cultural items may be encountered, the GC will implement consultation procedures and planning requirements of Section 3 and Section 5 of NAGPRA prior to issuing approval to proceed with the activity. (LD: 43 CFR 10.3 and 43 CFR 10.5)

(4) Establish initial communication with Federally recognized Indian Tribes via written correspondence between the GC and heads of tribal governments. Formally document all resulting agreements. (LD: 43 CFR 10)

(5) Inventory, summarize, and repatriate cultural items that are in existing collections under Army possession or control. Where there is a dispute as to the affiliation of cultural items, safeguard the cultural items until the dispute is resolved. (LD: 43 CFR 5, 6, 7, and 10)

e. ARPA and AHPA Compliance.

(1) Ensure the GC serves as the Federal land manager with responsibility for installation compliance with ARPA. (LD: 32 CFR 229)

(2) Ensure the GC serves as the Federal agency official with management authority over archeological collections and associated records. (LD: 36 CFR 79)

(3) Establish and include installation policy for management of, and for limitation of collection and removal of, paleontological resources in ICRMPs. Address known paleontological resources in any NEPA documentation prepared for actions that may impact or cause irreparable loss or destruction of such resources.

(4) Prohibit searching for or collection of historic properties (including archaeological resources) on Army installations except when authorized by the GC and pursuant to a permit issued under ARPA.

(5) Minimize the amount of archeological material remains permanently curated by reserving such treatment for diagnostic artifacts and other significant and environmentally sensitive material that will add important information to site interpretation.

(6) Curation of archeological materials from Army lands will occur only in 36 CFR 79-compliant repositories. Maximize use of off-installation facilities that are better able to provide for adequate long-term curatorial services.

(7) Do not disclose to the public information concerning the nature and location of any archaeological resource for which the excavation or removal requires a permit or other permission under ARPA or under any other provision of Federal law. (LD: Section 9a, ARPA 1979)

Chapter 7 Pollution Prevention

7-1. Policy

a. Pollution prevention is the Army's preferred approach, where timely and cost-effective, to achieve and maintain compliance with environmental laws and regulations.

b. Prevent pollution from all sources to the extent practicable by:

(1) Reducing pollutants at the source.

(2) Modifying manufacturing, packaging, and shipping processes, maintenance or other industrial practices.

(3) Modifying product designs.

(4) Developing and modifying acquisition systems.

(5) Recycling/reuse (to include implementing water and energy conservation measures), especially in closed-loop processes.

(6) Preventing disposal and transfer of pollution between media.

(7) Meeting affirmative procurement requirements and promoting the acquisition and use of environmentally preferable products and services.

(8) Promoting use of nontoxic substances.

c. Use pollution prevention to complement, and where practicable, replace traditional pollution control approaches.

d. Incorporate pollution prevention planning throughout the mission, operation, or product life cycle.

7-2. Legal and other requirements

a. 42 USC 6901, (*RCRA*).

b. PL 109-58.

c. Sections 6901-6992k, Title 42, United States Code (42 USC 6901-6992k)).

d. Sections 13101-13102, Title 42, United States Code (42 USC 13101-13102).

e. EO 13423.

f. DODI 4715.4.

APPENDIX C: PRESERVATION BRIEFS

List of Preservation Briefs by the National Park Service

Technical Preservation Services

(available online at <http://www2.cr.nps.gov/tps/briefs/presbhom.htm>). Titles in **bold type** are applicable to Camp Stanley and will be provided with the Final version of this ICRMP.

- 01: Assessing Cleaning and Water-Repellent Treatments for Historic Masonry Buildings
- 02: Repointing Mortar Joints in Historic Masonry Buildings
- 03: Conserving Energy in Historic Buildings
- 04: Roofing for Historic Buildings
- 05: The Preservation of Historic Adobe Buildings
- 06: Dangers of Abrasive Cleaning to Historic Buildings
- 07: The Preservation of Historic Glazed Architectural Terra-Cotta
- 08: Aluminum and Vinyl Siding on Historic Buildings: The Appropriateness of Substitute Materials for Resurfacing Historic Wood Frame Buildings
- 09: The Repair of Historic Wooden Windows
- 10: Exterior Paint Problems on Historic Woodwork
- 11: Rehabilitating Historic Storefronts
- 12: The Preservation of Historic Pigmented Structural Glass (Vitrolite and Carrara Glass)
- 13: The Repair and Thermal Upgrading of Historic Steel Windows
- 14: New Exterior Additions to Historic Buildings: Preservation Concerns
- 15: Preservation of Historic Concrete: Problems and General Approaches
- 16: The Use of Substitute Materials on Historic Building Exteriors
- 17: Architectural Character - Identifying the Visual Aspects of Historic Buildings as an Aid to Preserving Their Character
- 18: Rehabilitating Interiors in Historic Buildings - Identifying Character-Defining Elements
- 19: The Repair and Replacement of Historic Wooden Shingle Roofs
- 20: The Preservation of Historic Barns
- 21: Repairing Historic Flat Plaster - Walls and Ceilings
- 22: The Preservation and Repair of Historic Stucco
- 23: Preserving Historic Ornamental Plaster
- 24: Heating, Ventilating, and Cooling Historic Buildings: Problems and Recommended Approaches
- 25: The Preservation of Historic Signs
- 26: The Preservation and Repair of Historic Log Buildings

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- 27: The Maintenance and Repair of Architectural Cast Iron
 - 28: Painting Historic Interiors
 - 29: The Repair, Replacement, and Maintenance of Historic Slate Roofs
 - 30: The Preservation and Repair of Historic Clay Tile Roofs
 - 31: Mothballing Historic Buildings
 - 32: Making Historic Properties Accessible
 - 33: The Preservation and Repair of Historic Stained and Leaded Glass
 - 34: Applied Decoration for Historic Interiors: Preserving Historic Composition Ornament
 - 35: Understanding Old Buildings: The Process of Architectural Investigation
 - 36: Protecting Cultural Landscapes: Planning, Treatment and Management of Historic Landscapes
 - 37: Appropriate Methods of Reducing Lead-Paint Hazards in Historic Housing
 - 38: Removing Graffiti from Historic Masonry
 - 39: Holding the Line: Controlling Unwanted Moisture in Historic Buildings
 - 40: Preserving Historic Ceramic Tile Floors
 - 41: The Seismic Retrofit of Historic Buildings: Keeping Preservation in the Forefront
 - 42: The Maintenance, Repair and Replacement of Historic Cast Stone

APPENDIX D: CORRESPONDENCE

I. Issues that Jim Cannizzo identified after the Feb 2014 ICRMP was sent to THC.

- table 3-2 page 3-16 and 3-17 spacing skips many rows, delete the empty rows
- Appendix F appears to be missing some on the program comments docs I had emailed and loaded on the ftp site.
- Page 4 – 6 has some extra rows after the first para
- page G-9 has an extra space on "Summar y"
- Add the 1997 and 1998 THC concurrence letters on archaeological sites determinations to an appendix (probably appendix D correspondence)

II. THC Comment in Coverletter:

Generally speaking, the Archeology Division is in agreement with the proposed procedures for management of archeological resources as outlined in the ICRMP, but the review identified the need for additional information in order to complete our review. Specifically, as discussed in Sections 3.1.3 and 3.2 of the report, the majority of the installation considered to have potential for archeological resources was surveyed and tested during two distinct field investigations. The initial archeological survey identified 34 sites, 28 of which were deemed ineligible for the NRHP and another six of which were determined to require additional investigation. These were described in a 1998 report titled *Archeological Survey at Camp Stanley Storage Activity, Bexar County, Texas* authored by Kibler et al. The second field investigation involved additional survey that recorded six new sites, one of which was considered eligible, and testing of three of the sites previously identified as having eligibility potential during the first survey. These results were published in a second report titled *Archeological Survey and Testing at Camp Stanley Storage Activity, Bexar County, Texas* authored by Scott et al. 1998. While SHPO concurrence with the results of this second survey and testing is included in Appendix D, a review of our records suggests that the SHPO never reviewed or commented on the original determinations for the 34 sites presented in the Kibler et al. 1998 survey report. The exceptions are the three sites that were subsequently tested (41BX1163, 41BX1180, and 41BX1189) and reported on by Scott et al. 1998. As a result, in order to concur with the ICRMP, which presumes that only archeological sites determined to be eligible for the NRHP or that otherwise remain undetermined for such eligibility (i.e. "potentially eligible") need review (Section 4.2.1), our office will need to be provided with either copies of the SHPO correspondence or a copy of the Kibler et al. 1998 survey report in order to verify eligibility determinations on the 28 sites determined ineligible and not subsequently tested. Until such time as this is received, all archeological sites which lack eligibility-determinations from our office should be considered undetermined for NRHP-eligibility and treated as such.

Response: May 30, 1997 and Feb 3, 1998 concurrence letters provided showing THC concurrence on all the sites to THC on March 31, 2014 and issue resolved.

III. THC detailed comment.

1.

1	ES-1; Para 3	Please include a summary of extant historic buildings and structures, as you have provided for archeological sites.
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Comment addressed by adding additional summary wording of the 35 historic bldgs and structures to the table.

2.

2	2-3; Sect 2.2.2	Five-step review process lacks key steps and can be misleading. A more appropriate process would include: identification of the APE, in consultation with SHPO; identification of historic properties, in consultation with SHPO; assessment of effects, in consultation with SHPO; notification/consultation with interested parties and ACHP (as needed); resolution of any adverse effects, in consultation with SHPO, ACHP and consulting parties.
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Comment addressed by replacing the 5 step process in the ICRMP with the one described in the THC comment.

- Identify the Area of Potential Effects (APE), in consultation with SHPO;
- Identify historic properties, in consultation with SHPO;
- Assess effects, in consultation with SHPO
- Notify; consult with interested parties and ACHP as needed
- Resolution of any adverse effects, in consultation with SHPO, ACHP and consulting parties.

3.

3	2-4; Section 2.2.3	This section only describes those guidelines associated with documentation/recordation. Please add content that addresses the SOI's Standards and Guidelines for the Treatment of Historic Properties, which addresses appropriate treatments for "Restoration", "Preservation", "Reconstruction" and "Rehabilitation" projects.
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Comment addressed by adding the following second paragraph under 2.2.3.

The Secretary of the Interior also has issued Standards and Guidelines (Federal Regulation on treatments, Preservation, Rehabilitation, Restoration, and Reconstruction. The treatment Standards, developed in 1992, were codified as 36 CFR Part 68 in the July 12, 1995 *Federal Register* (Vol. 60, No. 133).

4.

4	3-8 (and Appendix F)	We concur with Camp Stanley Storage Activity's application of the 2007 nationwide <i>Program Comment for World War II Era (1939-1974) Ammunition Storage Facilities</i> for the associated property types located at Camp Stanley and noted in your report.
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No response needed.

5. and 6.0.

5	3-9; Para 3	CSSA Environmental Safety Office (2014). Please update to include SHPO concurrence, as expressed in the following comment.
6	3-14; Sect 3.3.3 (plus 4-5 and Appendix G)	We concur with Camp Stanley's determination of NOT ELIGIBLE for structures #19 [pool]; #32 [storehouse], and #33 [storehouse]. We also concur with Camp Stanley's determination that structure #97 [general storehouse] to the overall military landscape is potentially ELIGIBLE for the NRHP and should be consider so for future undertakings that might impact this structure.

Comment addressed by adding the following at the end of this paragraph at page 3-9 and 3-14:

THC concurred in those potential eligibility determinations as part of its March 27, 2014 comments on the revised February 2014 CSSA ICRMP.

7.

7	4-2; Section 4.1.1	Regarding Traditional Cultural Properties (TCPs) the ICRMP notes that these are common items of concern for Native Americans but states that no TCP surveys have been done or Native Americans consulted on these issues. Is there currently a plan to implement consultation with Native Americans over the potential for TCPs on Camp Stanley?
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Comment addressed by adding the following. There are no local federally recognized tribes with whom to consult over TCPs. The out-of-state federally recognized tribes that the much larger adjacent military facility, Camp Bullis, has attempted to consult with over TCPs have appeared to not be interested in providing such input. If Camp Bullis ever obtains such input, we will consider using that input or performing our own consultation.

8.

8	4-2; Sect 4.1.2	Does CSSA CRM also need to review tenant improvement or self-help projects within historic buildings, which do not get managed or funded through the CSSA process for standard construction projects?
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Comment not addressed. There are no tenants on CSSA or self-help projects. Camp Stanley is a small installation with only 130 fulltime Army personnel and a small amount of contractors. Maintenance is performed by Public Works or through government contracts, which are coordinated with the Environmental Safety Officer.

9.

9	4-3; Sect 4.2; Para 3	This paragraph is focused on archeological techniques. Please amplify to include the application of the SOI's Standards and Guidelines for Treatment of Historic Properties as a means for avoiding adverse effects and addressing preservation/protection of architectural historic resources.
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Comment addressed by replacing this passage at the end of the last paragraph on page 4-3:

- Replace: Two of these are Department of the Interior's *Treatment of Archaeological Properties – A Handbook* (1981), and the ACHP's *Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines* (1990).
- With: Two of these are *Advisory Council on Historic Preservation's Treatment of Archeological Properties: A Handbook* (2009) and the Secretary of the Interior Standards and Guidelines (Federal Regulation on treatments, Preservation, Rehabilitation, Restoration, and Reconstruction. The treatment Standards, developed in 1992, were codified as 36 CFR Part 68 in the July 12, 1995 *Federal Register* (Vol. 60, No. 133). These guidance documents can be used as a means for avoiding adverse effects and addressing preservation/protection of architectural historic resources.

10.

10	4-5; 4.2.1.2	Section states that "Implementation of an education/awareness program is a goal for the Cultural Resources Program at CSSA". How is this being accomplished? Are there active programs or plans for programs to be developed?
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Comment addressed by replacing wording in the last two sentences of this paragraph with:

Implementation of an education/ awareness program is accomplished through compliance inspections done as part of annual environmental compliance visits to the workplaces and with Public Works and the CSSA engineer and by restricting deer hunting to designated stand areas and prohibiting stalk hunting.

11.

11	4-5; Sect 4.2.1.3	Given that this is a subsection of Archeological Resources, in may be best to only address those undertakings affecting those resources and exclude "existing structures".
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Comment addressed by deleting "or existing structures".

12. Comment not addressed. As noted in the response to comment 8, CSSA is a small facility and does not have tenant or self help issues. There is already ample discussion of undertakings in the ICRMP.

12	4-5; Section 4.2.3	Architectural Resources. It would be helpful to expand this section to be comparable to the previous section for Archeological Resources. Subheadings could include "Neglect/Deterioration", "Tenant Improvements/Self-help Projects" and "Undertakings".
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13.

13	4-6; Para 3	Content requires clarification as it is a bit misleading. Resolution of effects can include minimization and avoidance measures. However, if an effect remains adverse, despite all attempts to minimize and avoid, then the effect must be mitigated. Documentation does serve as a typical means of mitigation. However, limiting the scope or adaptive reuse in lieu of demolition are minimization and avoidance measures, which may reduce the effect below the threshold of being adverse and needing to be mitigated. They, in and of themselves, are not mitigation. An adverse effect that cannot be resolved through minimization and avoidance would lead to development of an MOA to carry out further mitigation.
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Comment addressed by replacing this wording:

Mitigation measures would be considered in consultation with the SHPO. Typical mitigation measures that could apply to historic properties include:

- Limiting the magnitude of any undertaking to avoid affecting the characteristics that make each property an historic resource;
- Adaptive reuse of the properties instead of demolition; and
- Performing project activities or construction to ensure site preservation

- with:

Minimization and mitigation measures would be considered in consultation with the SHPO. Typical minimization measures that could apply to historic properties include:

- Limiting the magnitude of any undertaking to avoid affecting the characteristics that make each property an historic resource;
- Adaptive reuse of the properties instead of demolition; and
- Performing project activities or construction to ensure site preservation

14.

14	4-7; Para 1	How does this recommendation of annual systematic inspections translate into a management plan? It would be helpful to know what goals might be set to accomplish this in the coming five years (i.e. develop a comprehensive checklist of building systems/features that should be inspected). Also, it would be helpful to have a discussion of who might perform this inspection and whether this might be combined with any regular inventory that Real Property may conduct as part of their requirements - encouraging integration of CRM with other disciplines.
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Comment addressed: Camp Stanley (130 personnel total) is too small to write or need a separate management plan. There are only two facilities engineering personnel and they are co-located with the environmental safety officer and the safety officer conducts annual inspections and building custodians routinely inspect buildings. Add the following wording after the passage on inspections: The safety officer conducts annual inspections and building

managers routinely inspect their own buildings and input maintenance requests to Public Works.

15.

15	4-8; Para 2	This paragraph is incorrect. The Keeper does not get involved with dispute resolution.
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Comment addressed by deleting this sentence: "If a dispute cannot be resolved, the issue may be presented to the Keeper of the National Register for a final determination."

16.

16	4-8; Para 3	It is advisable to include reference to the 30-day review period required for submittals to the SHPO, on top of the 10-day CRM review.
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Comment addressed by adding the following sentence at the end of the third para on page 4-8.

Also, if the internal review finds there may be potential effects to cultural resources, project managers must allow at least 30 calendar days for review by the SHPO as set forth in the following section on external consultation.

17.

17	4-20; Section 4.4.1.6	In the final sentence of the paragraph at the top of the page the word "listed" is incorrectly spelled "lited".
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Comment addressed by correcting the spelling of listed.

18.

18	4-26; 4.8	Points of Contact: Remove Bob Brinkman, as he is no longer a Section 106 project reviewer. Please remove "Mr. Brad Jones" from the contact list and replace with "Bexar County Reviewer" for the Archeology Division. Because of potential future changes in staffing, the best person to contact should be verified through our website (http://www.thc.state.tx.us/contact#contact_proj_review), where current staff assignments are posted. Additionally, Darrell Creel is no longer the Director of the Texas Archeological Research Laboratory (TARL), and my understanding is they have appointed Jonathon Jarvis as acting director. I would recommend contacting them for an updated contact. Due to the span of the ICRMP, it may be optimal for specific reviewer names to be omitted and correspondence be addressed to each Division.
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Comment addressed by adding in "Bexar County Reviewer" before Brad Jones and inserting as of dates in front of the POCs and deleting Bob Brinkman and replacing Mr Creel with Mr Jarvis.

19. and 21.

19	5-7; SOP 3: Unanticipated Discovery	Three Typical Situations (#1-3) are outlined in which unanticipated discoveries are proposed. However, under subheading "Responsible Parties" the discussion refers to Situations #2, 3, and 4. Please correct to match Typical Situations as presented.
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21	5-8; Procedures	Discussion of procedures begins with "Situation #2". This needs to be changed to "Situation #1" to match Typical Situations as presented on page 5-7.
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Comments 19 and 21 addressed by renumbering passages.

20.

20	5-8; partial paragraph at top of page.	In the paragraph describing response to sites with human remains, please modify this sentence - "If human remains are found on land not owned by the federal government, CSSA must notify the SHPO." – to say: "If human remains are found on land not owned by the federal government, CSSA must notify the SHPO and follow guidelines for the discovery of human remains as set forth in Chapters 711–715 of the Texas Health and Safety Code."
----	--	---

Comment addressed by deleting those two sentences. CSSA does not do work outside its boundaries.

- Delete: "If human remains are found on land not owned by the federal government, CSSA must notify the SHPO. If possible, the CSSA will leave the remains in the ground. This represents the least disturbance to the remains, and will simplify compliance with NAGPRA."

22.

22	A-2	Please update links for online resources as some appear obsolete or have moved.
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Comment addressed by updating links.

23.

23	A-3	Reference for Secretary of Interior's Standards for Rehab (second listing on page) comes from an outdated federal tax program link. A preferable link that provides a more interactive use of the standards and guidelines can be found at: www.nps.gov/history/hps/tps/standguide/ .
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Comment addressed by replacing outdated link with new link:

www.nps.gov/history/hps/tps/standguide/

TEXAS HISTORICAL COMMISSION
real places telling real stories

March 27, 2014

Gabriel Moreno-Fergusson
Environmental Manager
Camp Stanley Storage Activity
McAlester Army Ammunition Plant
25800 Ralph Fair Rd
Boerne, TX 78015-4800

*Re: Project review under Section 106 of the National Historic Preservation Act of 1966
Updated Integrated Cultural Resources Management Plan (ICRMP), Camp Stanley, Boerne, Bexar
County*

Dear Mr. Moreno-Fergusson:

Thank you for your submittal of the Camp Stanley ICRMP, updated February 2014, which we received on February 25, 2014. This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission.

The review staff, comprised of Theresa A. de la Garza (filling in for Elizabeth Brummett), Brad Jones and William McWhorter, has completed its review of the ICRMP. Specific comments have been addressed in the enclosed SHPO Comment Sheet.

Generally speaking, the Archeology Division is in agreement with the proposed procedures for management of archeological resources as outlined in the ICRMP, but the review identified the need for additional information in order to complete our review. Specifically, as discussed in Sections 3.1.3 and 3.2 of the report, the majority of the installation considered to have potential for archeological resources was surveyed and tested during two distinct field investigations. The initial archeological survey identified 34 sites, 28 of which were deemed ineligible for the NRHP and another six of which were determined to require additional investigation. These were described in a 1998 report titled *Archeological Survey at Camp Stanley Storage Activity, Bexar County, Texas* authored by Kibler et al. The second field investigation involved additional survey that recorded six new sites, one of which was considered eligible, and testing of three of the sites previously identified as having eligibility potential during the first survey. These results were published in a second report titled *Archeological Survey and Testing at Camp Stanley Storage Activity, Bexar County, Texas* authored by Scott et al. 1998. While SHPO concurrence with the results of this second survey and testing is included in Appendix D, a review of our records suggests that the SHPO never reviewed or commented on the original determinations for the 34 sites presented in the Kibler et al. 1998 survey report. The exceptions are the three sites that were subsequently tested (41BX1163, 41BX1180, and 41BX1189) and reported on by Scott et al. 1998. As a result, in order to concur with the ICRMP, which presumes that only archeological sites determined to be eligible for the NRHP or that otherwise remain undetermined for such eligibility (i.e. "potentially eligible") need review (Section 4.2.1), our office will need to be provided with either copies of the SHPO correspondence or a copy of the Kibler et al. 1998 survey report in order to verify eligibility determinations on the 28 sites determined ineligible and not subsequently tested. Until such time as this is received, all archeological sites which lack eligibility-determinations from our office should be considered undetermined for NRHP-eligibility and treated as such.



RICK PERRY, GOVERNOR • MATTHEW F. KREISLE, III, CHAIRMAN • MARK WOLFE, EXECUTIVE DIRECTOR

P.O. BOX 12276 • AUSTIN, TEXAS • 78711-2276 • P 512.463.6100 • F 512.475.4872 • TDD 1.800.735.2989 • www.thc.state.tx.us

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. **If you have any questions concerning our review or if we can be of further assistance, please contact Theresa A. de la Garza at 512/463-8952.**

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa A. de la Garza". The signature is fluid and cursive, with the first name "Theresa" being the most prominent.

Theresa A. de la Garza, Project Reviewer, for:
Mark Wolfe, Chief Deputy State Historic Preservation Officer

cc: James Cannizzo, U.S. Army (via email)
Julie Burdey, Parsons (via email)

MW/tg

**CAMP STANLEY ICRMP
(Updated 2014)**

SHPO COMMENT MATRIX

Comment No.	Page; Para/Sect	Comment
1	ES-1; Para 3	Please include a summary of extant historic buildings and structures, as you have provided for archeological sites.
2	2-3; Sect 2.2.2	Five-step review process lacks key steps and can be misleading. A more appropriate process would include: identification of the APE, in consultation with SHPO; identification of historic properties, in consultation with SHPO; assessment of effects, in consultation with SHPO; notification/consultation with interested parties and ACHP (as needed); resolution of any adverse effects, in consultation with SHPO, ACHP and consulting parties.
3	2-4; Section 2.2.3	This section only describes those guidelines associated with documentation/recordation. Please add content that addresses the SOI's Standards and Guidelines for the Treatment of Historic Properties, which addresses appropriate treatments for "Restoration", "Preservation", "Reconstruction" and "Rehabilitation" projects.
4	3-8 (and Appendix F)	We concur with Camp Stanley Storage Activity's application of the 2007 nationwide <i>Program Comment for World War II Era (1939-1974) Ammunition Storage Facilities</i> for the associated property types located at Camp Stanley and noted in your report.
5	3-9; Para 3	CSSA Environmental Safety Office (2014). Please update to include SHPO concurrence, as expressed in the following comment.
6	3-14; Sect 3.3.3 (plus 4-5 and Appendix G)	We concur with Camp Stanley's determination of NOT ELIGIBLE for structures #19 [pool]; #32 [storehouse], and #33 [storehouse]. We also concur with Camp Stanley's determination that structure #97 [general storehouse] to the overall military landscape is potentially ELIGIBLE for the NRHP and should be consider so for future undertakings that might impact this structure.
7	4-2; Section 4.1.1	Regarding Traditional Cultural Properties (TCPs) the ICRMP notes that these are common items of concern for Native Americans but states that no TCP surveys have been done or Native Americans consulted on these issues. Is there currently a plan to implement consultation with Native Americans over the potential for TCPs on Camp Stanley?
8	4-2; Sect 4.1.2	Does CSSA CRM also need to review tenant improvement or self-help projects within historic buildings, which do not get managed or funded through the CSSA process for standard construction projects?
9	4-3; Sect 4.2; Para 3	This paragraph is focused on archeological techniques. Please amplify to include the application of the SOI's Standards and Guidelines for Treatment of Historic Properties as a means for avoiding adverse effects and addressing preservation/protection of architectural historic resources.
10	4-5; 4.2.1.2	Section states that "Implementation of an education/awareness program is a goal for the Cultural Resources Program at CSSA". How is this being accomplished? Are there active programs or plans for programs to be developed?
11	4-5; Sect 4.2.1.3	Given that this is a subsection of Archeological Resources, in may be best to only address those undertakings affecting those resources and exclude "existing structures".
12	4-5; Section 4.2.3	Architectural Resources. It would be helpful to expand this section to be comparable to the previous section for Archeological Resources. Subheadings could include "Neglect/Deterioration", "Tenant Improvements/Self-help Projects" and "Undertakings".

Camp Stanley ICRMP: SHPO Comment Matrix

Comment No.	Page; Para/Sect	Comment
13	4-6; Para 3	Content requires clarification as it is a bit misleading. Resolution of effects can include minimization and avoidance measures. However, if an effect remains adverse, despite all attempts to minimize and avoid, then the effect must be mitigated. Documentation does serve as a typical means of mitigation. However, limiting the scope or adaptive reuse in lieu of demolition are minimization and avoidance measures, which may reduce the effect below the threshold of being adverse and needing to be mitigated. They, in and of themselves, are not mitigation. An adverse effect that cannot be resolved through minimization and avoidance would lead to development of an MOA to carry out further mitigation.
14	4-7; Para 1	How does this recommendation of annual systematic inspections translate into a management plan? It would be helpful to know what goals might be set to accomplish this in the coming five years (i.e. develop a comprehensive checklist of building systems/features that should be inspected). Also, it would be helpful to have a discussion of who might perform this inspection and whether this might be combined with any regular inventory that Real Property may conduct as part of their requirements - encouraging integration of CRM with other disciplines.
15	4-8; Para 2	This paragraph is incorrect. The Keeper does not get involved with dispute resolution.
16	4-8; Para 3	It is advisable to include reference to the 30-day review period required for submittals to the SHPO, on top of the 10-day CRM review.
17	4-20; Section 4.4.1.6	In the final sentence of the paragraph at the top of the page the word "listed" is incorrectly spelled "lited".
18	4-26; 4.8	Points of Contact: Remove Bob Brinkman, as he is no longer a Section 106 project reviewer. Please remove "Mr. Brad Jones" from the contact list and replace with "Bexar County Reviewer" for the Archeology Division. Because of potential future changes in staffing, the best person to contact should be verified through our website (http://www.thc.state.tx.us/contact#contact_proj_review), where current staff assignments are posted. Additionally, Darrell Creel is no longer the Director of the Texas Archeological Research Laboratory (TARL), and my understanding is they have appointed Jonathon Jarvis as acting director. I would recommend contacting them for an updated contact. Due to the span of the ICRMP, it may be optimal for specific reviewer names to be omitted and correspondence be addressed to each Division.
19	5-7; SOP 3: Unanticipated Discovery	Three Typical Situations (#1-3) are outlined in which unanticipated discoveries are proposed. However, under subheading "Responsible Parties" the discussion refers to Situations #2, 3, and 4. Please correct to match Typical Situations as presented.
20	5-8; partial paragraph at top of page.	In the paragraph describing response to sites with human remains, please modify this sentence - "If human remains are found on land not owned by the federal government, CSSA must notify the SHPO." – to say: "If human remains are found on land not owned by the federal government, CSSA must notify the SHPO and follow guidelines for the discovery of human remains as set forth in Chapters 711–715 of the Texas Health and Safety Code."
21	5-8; Procedures	Discussion of procedures begins with "Situation #2". This needs to be changed to "Situation #1" to match Typical Situations as presented on page 5-7.
22	A-2	Please update links for online resources as some appear obsolete or have moved.
23	A-3	Reference for Secretary of Interior's Standards for Rehab (second listing on page) comes from an outdated federal tax program link. A preferable link that provides a more interactive use of the standards and guidelines can be found at: www.nps.gov/history/hps/tps/standguide/ .



TEXAS
HISTORICAL
COMMISSION

George W. Bush • Governor

John L. Nau, III • Chairman

Curtis Tunnell • Executive Director

The State Agency for Historic Preservation

May 30, 1997

Michael Enschede
Chief, Planning Division
Dept. of the Army
Ft. Worth District, Corps of Engineers
P.O. Box 17300
Fort Worth, Texas 76102-0300

Re: Draft Report:
Archeological Survey at Camp Stanley Storage Activity, Bexar County, Texas.
(COE-FWD, F2, F14, F31)

Dear Mr. Enschede:

Thank you for the opportunity to review the above-referenced draft survey report. After reviewing the document, we concur with the contractor's assessments of National Register eligibility for archeological sites. Specifically, we concur that the following sites are ineligible for inclusion in the National Register of Historic Places due to extreme deflation or disturbance from past actions at the facility:

Prehistoric components: 41BX1156, 1157, 1158, 1169, 1171, 1172, 1173, 1174, 1175, 1176, 1177, 1178, 1181, 1182, 1183, 1184, 1185, 1187, and 1189

Historic components: 41BX1156, 1159, 1160, 1161, 1162, 1164, 1165, 1166, 1168, 1169, 1170, 1172, 1179, and 1186.

We also concur that the following sites warrant additional research to determine their eligibility for inclusion in the National Register of Historic Places:

Prehistoric components: 41BX1180

Historic components: 41BX1163, 1188, and 1189 (training trenches only).

We have no specific editorial comments and look forward to receiving 20 copies of the final report. If we may be of further assistance, please contact Bill Martin of our staff at 512/463-5867.

Sincerely,

A handwritten signature in cursive script, appearing to read "James E. Bruseth".

James E. Bruseth, Ph.D.
Deputy State Historic Preservation Officer

JEB/wam

cc: Karl Kibler, Prewitt & Associates, Inc.

DIVISION OF ANTIQUITIES PROTECTION

P.O. Box 12276 • Austin, TX 78711-2276 • 512/463-6096 • Fax 512/463-8927 • TDD 1-800-735-2989



TEXAS
HISTORICAL
COMMISSION

George W. Bush • Governor
John L. Nau, III • Chairman
Curtis Tunnell • Executive Director

The State Agency for Historic Preservation

February 3, 1998

Mr. Michael Enschede
Chief, Environmental Division
Department of the Army
Fort Worth District, Corps of Engineers
P. O. Box 17300
CESWF-EV-EC
Fort Worth, Texas 76102-0300

Re: Draft Report: *Archeological Survey and Testing at Camp Stanley Storage Activity, Bexar County, Texas* (COE-FWD, F2, F19)

Dear Mr. Enschede:

We are in receipt of the above referenced draft archeological survey report. After reviewing the document, we find it acceptable. We agree with the conclusions of the authors, which have been endorsed by the COE-FWD and the CSSA: (1) sites 41BX1233, 41BX1234, and 41BX1236-41BX1238 are not eligible for inclusion in the National Register of Historic Places and no further work is needed at these sites; (2) because the testing revealed that it lacks well-preserved deposits or features, site 41BX1180 should no longer be considered eligible for inclusion in the National Register of Historic Places; and (3) sites 41BX1235 and 41BX1163/1189 possess either significant integrity of design, setting, or place, or have important historical or cultural associations and are therefore eligible for listing in the National Register of Historic Places.

We look forward to receiving 20 copies of the final report along with a completed *Abstracts in Texas Contract Archeology* form.

If you have any questions, please contact Mr. Herb Uecker at 512/463-5866.

Sincerely,

James E. Bruseth, Ph.D.
Deputy State Historic Preservation Officer

JEB/hgu

cc: Elton R. Prewitt and Karl W. Kibler, Co-Principal Investigators

DIVISION OF ANTIQUITIES PROTECTION

P.O. Box 12276 • Austin, TX 78711-2276 • 512/463-6096 • Fax 512/463-8927 • TDD 1-800-735-2989

February 19, 1998

Environmental Division

SUBJECT: Proceed with final report, "*Archeological Survey and Testing at Camp Stanley Storage Activity, Bexar County, Texas*"

Prewitt & Associates, Inc.
ATTN: Mr. Elton Prewitt
7701 North Lamar, Suite 104
Austin, Texas 78752-1012

Dear Mr. Prewitt:

We have received a concurrence letter dated February 3, 1998 from the Texas Historical Commission concurring with the recommendations contained in the referenced final draft report (Enclosure). This report was produced by your office in partial fulfillment of Delivery Order 0013 of Contract Number DACA63-95-D-0051 for an archeological survey at Camp Stanley Storage Activity (CSSA), near Boerne, Texas.

This correspondence serves as your notice to proceed with the production of the final deliverable for this project. We look forward to receiving the final thirty (30) documents. Please refer to Section 4.7 of the scope of work for this deliverable to determine the additional requirements. If you have any questions you may direct them to Mr. Stephen P. Austin at 817-978-6385.

Sincerely,

Enclosure

William M. Metz
Authorized Representative
of the Contracting Officer

Copy Furnished:

✓
Commander
Camp Stanley Storage Activity
ATTN: SIORR-K (Mr. Brian Murphy)
25800 Ralph Fair Road
Boerne, Texas 78015-4800

PREWITT & ASSOCIATES, INC.

CONSULTING ARCHEOLOGISTS

Established 1979

7701 N. LAMAR, SUITE 104
AUSTIN, TEXAS 78752-1012
FAX (512) 459-3851
(512) 459-3349

13 April, 1998

Camp Stanley Storage Activity
ATTN: Mr. Brian Murphy (SIORR-K)
25800 Ralph Fair Road
Boerne, Texas 78015-4800

Dear Mr. Murphy:

Enclosed please find the Letter of Transfer of Archeological Collections as is required by the Texas Archeological Research Laboratory. This letter documents your acceptance of TARL as the curatorial facility for the collections from the following project:

Cultural Resources Survey of 991 Acres and Archeological Testing at Camp Stanley Storage Activity (PAI Project # 96023).

All that you need to do is sign and date the letter and return it to me. If you have any questions or need more information, please do not hesitate to contact me.

Sincerely,



Karen M. Gardner
Vice President/Laboratory Director

KMG/sf
Enclosure

PREWITT & ASSOCIATES, INC.
CONSULTING ARCHEOLOGISTS
Established 1979

7701 N. LAMAR, SUITE 104
AUSTIN, TEXAS 78752-1012
FAX (512) 459-3851
(512) 459-3349

Records and Collections Curation
Texas Archeological Research Laboratory
The University of Texas at Austin
J.J. Pickle Research Campus, Building 5
Austin, Texas 78712-1100

LETTER OF TRANSFER OF ARCHEOLOGICAL COLLECTIONS

This letter documents the transfer of archeological collections, specimens, and /or records, from the offices of Prewitt and Associates, Austin, Texas to the Texas Archeological Research Laboratory, the University of Texas at Austin. These materials were collected and produced as result of the project, Cultural Resources Survey of 991 Acres and Archeological Testing at Camp Stanley Storage Activity, P&A project number 96023, and from Bexar county(ies), Texas.

Transferred materials are listed on an attached inventory and are submitted to the Texas Archeological Research Laboratory for permanent curation by the Sponsoring Agency, U.S. Army Red River Army Depot, Camp Stanley Storage Activity (U.S. Government), Boerne, Texas, and by the Submitting Archeologist, Prewitt and Associates, Austin, Texas.

Texas Archeological Research Laboratory recognizes the ownership of the transferred materials as the property of the U.S. Government. As the curating facility, Texas Archeological Research Laboratory shall provide for the professional care and management of the collection, provide the necessary protection of the collection, not adversely alter or deface any portion of the collection, and not pledge, assign, repatriate, exchange, or discard any part of the collection without specific written permission of the U.S. Government. As the curating facility, Texas Archeological Research Laboratory may make loans, request and authorize analyses, reorganize the collection, and otherwise maintain and use the materials as outlined in guidelines for curatorial facilities. Transfer to another curatorial facility will be to a facility with equal or better capacity for permanent curation. Texas Archeological Research Laboratory is the acknowledged holder of these materials and may use the materials as outlined above or as determined in consultation with the U.S. Government.

Brian K. Murphy
Signature of Authorized Agent - Sponsoring Agency

Mr. Brian Murphy
Authorized Agent - Sponsoring Agency
(type or print)

Environmental Officer
Title/Position

14 April 98
Date

Address:

Camp Stanley Storage Activity
ATTN: Mr. Brian Murphy (SIORR-K)
25800 Ralph Fair Road
Boerne, Texas 78015-4800

Karen M. Gardner
Signature of Authorized Agent - Submitting Archeologist

Ms. Karen Gardner
Authorized Agent - Submitting Archeologist
(type or print)

Vice President/ Laboratory Director
Title/Position

April 13, 1998
Date

Address:

Prewitt and Associates
Attention: Ms Karen Gardner
7701 North Lamar, Suite 104
Austin, Texas 78752-1012

**APPENDIX E: SAMPLE LETTERS RE: CULTURAL RESOURCES: 1) INITIATING
CONSULTATION WITH NATIVE AMERICAN GROUPS; 2) FROM THE CSSA
MANAGER RE: PROTECTION OF CULTURAL RESOURCES**

SAMPLE TRIBE NOTIFICATION LETTER RE: UPCOMING PROJECT

[Insert official address block]

[Insert Tribal address block]

Dear Mr. President:

I am writing to inform you of a proposed construction project entitled “[insert name of project],” currently in the planning stages at [insert agency city/installation]. The proposed project is planned for a parcel located at [insert location]. This notification is required by The National Historic Preservation Act of 1966 (NHPA) as amended, the Archaeological Resources Protection Act of 1979 (ARPA), and the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA).

Phase I subsurface archeological testing of the proposed project areas of [insert name of project site] will be conducted in compliance with Section 106 of the NHPA. In accordance with Executive Order 13175, we are inviting you to consult with us regarding the implementation of this construction project. We will be contacting your office to arrange for a meeting to enter into consultation concerning this project. If there are specific individuals that you prefer we contact, please forward the name and method of initiating consultation with this individual, or with your designated tribal representative, traditional religious leader, or preferred NHPA point of contact. We are also contacting officials of the [insert names of other tribes, if needed] to invite them to consult with us on this issue. I look forward to working with you or your designated representative on this project. Please contact [insert name and telephone number of agency representative] at your earliest convenience.

Sincerely,

[Insert installation official signature block]

SAMPLE LETTER FROM THE CSSA MANAGER RE: PROTECTION OF CULTURAL RESOURCES

Date

MEMORANDUM FOR Distribution

SUBJECT: Cultural Resources on Camp Stanley Storage Activity

1. Numerous archeological and historical sites exist on Camp Stanley Storage Activity. These sites represent a valuable and irreplaceable scientific and cultural resource.

2. All such cultural resources are under the full protection of federal law. It is illegal to disrupt, destroy, excavate, or otherwise remove artifacts or any other objects from the surface or beneath the surface of these sites. Even taking a single arrowhead found on installation property is a federal crime. Offenders may receive maximum fines of \$100,000 with up to five years imprisonment. Rewards of up to \$500 may be paid to any person who furnishes information leading to a finding of civil violation or conviction of criminal violations.

3. Each Directorate on Camp Stanley Storage Activity must notify their personnel of this situation and provide sufficient control to prevent damage to, or any unauthorized removal of, artifacts and other objects from such sites. The federal laws are applicable not only to individuals collecting artifacts, but also to official organizational and program-related construction, such as construction of roads, grading of firebreaks, excavation for communication cables, utilities, etc. All official actions that may impact a site require prior coordination with the installation CRM.

4. Excavating, "breaking ground," or disturbing any surface or subsurface landscape must not be accomplished until an environmental compliance review has been completed in accordance with AR 200-1 and installation regulation [insert, if applicable xxxxx]. Advanced planning and early coordination will prevent costly delays in projects requiring landscape modification or displacement.

5. Individuals discovering suspected archeological materials should leave them in place and report their location to the CSSA CRM, telephone XXXXX, Building. #X. Suspected violations should likewise be reported to the above.

Installation Manager

**APPENDIX F: ARMY AMMUNITION AND
EXPLOSIVES STORAGE IN THE UNITED STATES: 1775-1945**

Note: Appendix F is provided electronically in the CD-Rom included with the report.

**APPENDIX G:
ANALYSIS OF POTENTIAL NRHP ELIGIBILITY OF EXISTING COLD WAR ERA
BUILDINGS AND STRUCTURES (1947 – 1963)**

Four buildings have been identified with construction dates between 1947 and 1963, during the early Cold War period. These architectural resources are evaluated for listing in the National Register of Historic Places (NRHP) under 36 CFR 60, the Department of Defense (DoD) and Army guidelines for evaluating Cold War resources (Center for Air Force History 1994; U.S. Army Environmental Center [USAEC]1997), and the historic context for evaluating mid-century modern military buildings (Hampton, *et al.* 2012).

Evaluation Guidelines

National Park Service Guidelines. The National Park Service has developed four criteria for assessing the historical significance (i.e., NRHP eligibility) of cultural resources (Table 1). At least one criterion of the National Register Criteria of Evaluation must be met for a property to be considered eligible to the NRHP. Usually, a property should be at least 50 years old to qualify for listing in the NRHP. Federal laws and regulations regarding the management and treatment of historic properties (i.e., NRHP eligible resources) are invoked by the property's NRHP eligibility as determined in consultation with the appropriate State Historic Preservation Office (SHPO). It is not necessary that a potentially eligible property actually be listed in the NRHP to be subject to special management considerations.

Table 1: Criteria for Inclusion of a Property for listing in the NRHP

Criterion	Association	Characteristic
A	Event	Properties associated with events that have made a significant contribution to the broad patterns of U.S. history
B	Person	Properties associated with the lives of persons significant in U.S. history
C	Design/Construction	Properties that embody the distinctive characteristics of a type, period or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction
D	Information Potential	Properties that have yielded, or may be likely to yield, information important in prehistory or history

Source: National Park Service 1991

In addition to significance, a property must have integrity to be eligible for the NRHP. Integrity involves the ability of a property to convey its demonstrated significance. Seven individual elements comprise integrity: location, design, setting, materials, workmanship, feeling, and association (Table 2). It is not required that an historic property display all these qualities. However, some, if not all of the seven aspects, should be present in a property for it to retain its historic integrity.

Table 2: Qualities of Integrity Related to Eligibility for the NRHP

Quality	Description
Location	The place where the historic property was constructed or where the historic event occurred
Design	The combination of elements that create the form, plan, space, structure, and style of a property
Setting	The physical environment of a historic property. This quality refers to the character of the property's location. It involves how the property is situated and its relationship to surrounding

	features and open space. For districts, setting is important not only within the boundaries of the property, but also between the property and its surroundings
Materials	The physical elements that were combined or deposited during a particular period of time and in particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of the creator(s) and suggest the availability of particular types of materials and technologies. A property must retain the key exterior materials dating from the period of its historic significance. If rehabilitated, those materials must have been preserved
Workmanship	The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. Workmanship is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site and may apply to the property as a whole or to individual components
Feeling	A property's expression of the aesthetic or historic sense of a particular period of time. Feeling results from the presence of physical features that, taken together, convey the property's historic character
Association	The direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer

Source: National Park Service 1991

Department of Defense Guidelines. The Legacy Cold War Task Area did not suggest that the Department of Defense should consider all Cold War resources as eligible for the National Register (Center for Air Force History 1994). Instead, the important types of resources from the Cold War should be identified. To determine historical value of Cold War resources, they should first be broadly catalogued according to property type and function. The Cold War Task Area suggests asking the following questions regarding the resource:

- How central were they to the military mission?
- How many were developed or constructed?
- How much did the Defense Department invest in them?
- Does a site or structure retain historical integrity?
- What, and where, are similar or equivalent properties?

The Cold War Task Force recommended that the importance of Cold War cultural resources be considered on the state and local as well as on the national level (Center for Air Force History 1994). However, it states that DoD Cold War properties determined significant and eligible for the NRHP are so designated at the national level. Regional or local significance "remains to be determined through overviews, background studies, and inventories to be conducted as these properties approach the 50 year horizon" (Center for Air Force History 1994:65).

The Cold War Task Force suggested the following criteria of historic significance for Cold War properties:

Buildings, structures, objects, sites, or districts that possess exceptional value or quality in illustrating the Cold War heritage of the United States, that possess a high

degree of integrity of location, design, setting, materials, workmanship, feeling and association, and:

- That are directly associated with events that have made a significant contribution to, and are directly identified with, or that outstandingly represent, the broad national pattern of United States Cold War history and from which an understanding and appreciation of those patterns may be gained; or
- That are associated directly and importantly with the lives of persons *nationally significant* in the Cold War history of the United States; or
- That represent some great idea or ideal of the American people (e.g. Peace through Strength"); or
- That embody the distinguishing characteristics of an architectural, engineering, technological, or scientific type specimen *exceptionally valuable* for a study of a period, style, method, or technique of construction, or that represent a significant, distinctive and *exceptional* entity whose components may lack individual distinction. (Center for Air Force History 1994:66)

Army Cold War Guidelines. The Army's *Thematic Study and Guidelines: Identification and Evaluation of U.S. Army Cold War Era Military-Industrial Historic Properties* (USAEC 1997) provides guidance concerning identification of the proper context and resource types under which surveyed resources can be considered eligible for NRHP listing for their military association. A series of themes related to the Army's Cold War military-industrial context have been developed. To be considered a Cold War resource, the Army guidelines state that the resource should be directly associated with the Cold War (1946-1989) and not merely constructed or developed during that time (USAEC 1997:90, 117). Cold War resources also must meet one of the NRHP criteria and, to be considered exceptionally important, the Cold War resource must demonstrate national significance. Army guidelines also require that Cold War resource types must also be compared to similar types (USAEC 1997:119).

Building evaluations are conducted in three stages. First, building function is identified according to the Army Guidelines (USAEC 1997). Then historical significance related to appropriate Cold War themes are defined. Finally, the seven aspects of physical integrity are applied to define each building's ability to convey its significance to the Cold War themes (i.e., NRHP eligibility).

Military buildings and structures were organized by function based on how structures were used during the Cold War. Most of the buildings erected by the Army during the Cold War era were related to Base Operations (BASOPS). BASOPS properties provided a variety of general functions, including chapels, clubs, commissaries/exchanges, garages, guardhouses, housing, dining halls, recreational facilities and utilities (USAEC 1997:112). Because these properties would have been built as part of the normal evolution of the Army, they are not considered by the Army to be related to the Cold War military-industrial historic context (USAEC 1997:91). Under current Army guidelines, these resources should be evaluated for NRHP eligibility under other contexts and cannot be found exceptionally significant under the military-industrial Cold War context (USAEC 1997:117).

Historic Context for Mid-Century Modern Military Buildings. This DoD context addresses architectural styles of military buildings constructed between 1950 and 1975. The types of facilities assessed include command facilities, administrative offices, training and educational facilities, barracks, laboratories and test facilities, medical facilities, and recreational and dining facilities (Hampton, *et al.* 2012). Utilitarian buildings, such as buildings with restricted access, isolated locations, and simple or functional design, are briefly discussed and identified as less likely to be considered eligible for listing in the NRHP for their architectural merit (Hampton, *et al.* 2012:4-5).

Architectural Resources

Four buildings have been identified with construction dates during the early Cold War period: Building 19 (outdoor swimming pool), Building 32 (general storehouse), Building 33 (general storehouse), and Building 97 (general storehouse- electrical equipment).

Building 19, the outdoor swimming pool, was built in 1963 (Figure 1). This swimming pool has been remodeled at least twice based on information provided by the current engineering personnel. In 2002, the small pool house was added. The pool has a new liner and modern fixtures. The pool and pool house are in good condition.



Figure 1, Building 19, the Outdoor Swimming Pool.

Building 19, the outdoor swimming pool, is a recreational facility and under DoD and Army Cold War resources evaluation guidelines, it is classified as BASOPS related. Because it would

have been built as part of the normal evolution of the Army, the outdoor swimming pool is not considered by the Army to be related to the Cold War military-industrial historic context under Criterion A. Building 19, the outdoor swimming pool, is not associated with any persons important to national, regional, or local history under Criterion B and does not embody distinctive characteristics of a type, period or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction under Criterion C. Building 19, the outdoor swimming pool, is not recommended as eligible for listing in the NRHP.

Building 32, a small general storehouse, was built in 1952 (Figure 2). This 10 X 10 foot metal structure has a metal gabled roof with two vents, a double door entrance, and is mounted on skids. It was used for storage. It is not known whether this building was fabricated locally or purchased. Building 32 exhibits dents, peeling paint and contains a substantial amount of rust on the bottom of the structure.



Figure 2. Building 32, General Storehouse.

Building 32, the general storehouse, is a small (100 square foot) storage shed and under DoD and Army Cold War resources evaluation guidelines, it is classified as BASOPS related. Because it would have been built as part of the normal evolution of the Army, the metal storage shed is not considered by the Army to be related to the Cold War military-industrial historic context under Criterion A. Building 32 is not associated with any persons important to national, regional, or local history under Criterion B. This small shed is classified as a utilitarian building under the historic context for evaluation mid-century modern military buildings (Hampton, *et al.* 2013). Specifically, Building 32 represents a “small prefabricated steel building of plain gabled design. These buildings were mass-produced by several different steel-producing companies including Star Manufacturing and Butler Manufacturing. These buildings generally have a low level of architectural significance and are extremely common” (Hampton, *et al.* 2013:5). Building 32 as a small utilitarian building does not embody distinctive characteristics of a type, period or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction under Criterion C. Building 32, a general storehouse, is not recommended as eligible for listing in the NRHP.

Building 33, a general storehouse, built in 1952. This 12 X 20 foot remnant of a larger structure (18 X 20 foot) has a concrete foundation, with cement walls on one half of the building and metal walls and roof on the other half (Figure 3). The metal portion of the building has two doors on the main elevation (Figure 4) and one six-over-six window on each side elevation. The original function was powder recovery and storage. Much of the structure was demolished in 1971 as part of the conversion of the building adjacent to it from a munitions handling building into a public works building. The south section of the building and the powder recovery piping and vacuum equipment were removed. The remaining structure is a shell and is in poor condition.



Figure 3. Building 33, General Storehouse, View from South (looking north).



Figure 4. Building 33, General Storehouse, View from East (looking west).

Building 33, a general storehouse, is a small (254 square foot) storage shed and under DoD and Army Cold War resources evaluation guidelines, it is classified as BASOPS related. Because it would have been built as part of the normal evolution of the Army, the concrete and metal storage shed is not considered by the Army to be related to the Cold War military-industrial historic context under Criterion A. Building 33 is not associated with any persons important to national, regional, or local history under Criterion B. This small shed is classified as a utilitarian building under the historic context for evaluation mid-century modern military buildings (Hampton, *et al.* 2013). Specifically, Building 33 represents a “small magazine or other small utilitarian ammunition-storage building” (Hampton, *et al.* 2013:5). Building 33 as a small utilitarian building does not embody distinctive characteristics of a type, period or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction under Criterion C. Building 33, a general storehouse, is not recommended as eligible for listing in the NRHP.

Building 97, a general storehouse, (157 sq ft) was built in 1947. This 12 X 13 foot structure has a concrete foundation, concrete walls, gabled roof with red Spanish tile. The main elevation contains a pedestrian door and an oversize door (Figure 5); a side elevation exhibits a small louvered window (Figure 6). Building 97 was constructed to house electrical equipment. It is in excellent condition.



Figure 5. Building 97, General Storehouse.



Figure 6, Building 97, General Storehouse

Building 97, a general storehouse, is a small (157 square foot) storage shed and under DoD and Army Cold War resources evaluation guidelines, it is classified as BASOPS related. Because it would have been built as part of the normal evolution of the Army, the concrete and metal storage shed is not considered by the Army to be related to the Cold War military-industrial historic context under Criterion A. Building 97 is not associated with any persons important to

national, regional, or local history under Criterion B. This small shed is classified as a utilitarian building under the historic context for evaluation mid-century modern military buildings (Hampton, *et al.* 2013). Specifically, Building 97 represents a “small concrete block or poured concrete utility shed of plain design. These buildings commonly housed water sewage pumps, steam heating system equipment, or other types of small equipment” (Hampton, *et al.* 2013:5). Even though Building 97 as a small utilitarian building, it does exhibit the red Spanish tile roof which is a distinctive feature of San Antonio historic military architecture. Building 97 is not considered individually significant but its architecture style may contribute to the overall military landscape at Camp Stanley. Building 97, a general storehouse, is recommended as potentially eligible for listing in the NRHP.

Summary and Conclusions

Four Cold War era buildings were evaluated for listing in the NHRP, the Department of Defense (DoD) and Army guidelines for evaluating Cold War resources (Center for Air Force History 1994; U.S. Army Environmental Center [USAEC]1997), and the historic context for evaluating mid-century modern military buildings (Hampton, *et al.* 2012). Building 19 (outdoor swimming pool), Building 32 (general storehouse), and Building 33 (general storehouse) are not recommended eligible for listing in the NRHP because they represent BASOPS functions under the Cold War guidelines and the two storehouse are characterized by simple and functional architectural design. Building 97 (general storehouse- electrical equipment) is considered potentially eligible for listing in the NRHP because it may contribute to an overall military landscape based on Spanish style architecture at Camp Stanley.

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