

APPENDIX C

**Class I Cultural Resources
Literature Review for Office
Building Construction for the
Federal Bureau of Investigation
Denver Divisions Office, Denver,
Colorado**

Prepared for

**Waterstone Environmental Hydrology and
Engineering, Inc.**

Prepared by

SWCA Environmental Consultants

August 2007

**Class I Cultural Resources Literature Review for
Office Building Construction for the Federal Bureau of Investigation
Denver Division Office, Denver, Colorado**

Submitted to

**Waterstone Environmental
Hydrology and Engineering, Inc.**

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SWCA Cultural Resource Report No. 2007-257**

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ABSTRACT

The General Services Administration (GSA) proposes to construct a new office building in Denver, Colorado. The GSA will procure approximately 10 acres (ac) of land to build a new facility to house the Federal Bureau of Investigation (FBI). The proposed 9.893-ac site is located in the Stapleton Redevelopment Area and is bounded by Quebec Regional Retail Center to the west; 36th Avenue to the north; 35th Avenue to the south; and Ulster Street to the east.

On May 3, 2007, SWCA Environmental Consultants (SWCA) conducted a cultural resources file search of the project area. Numerous historic sites, including various building, schools, and neighborhoods, surround the project area. In addition, two prehistoric sites (5DV5 and 5DV16) and one paleontological site (5DV17) have been recorded adjacent to the project area. The project area is located within one previously identified site area, 5DV711, Stapleton International Airport. This historic airport covers approximately 2,701 ac and has been recommended not eligible for nomination to the National Register of Historic Places (NRHP). Historic research in conjunction with soil and environmental data, as well as the intensively disturbed nature of the project area indicate the potential for encountering surface or subsurface prehistoric or historic archaeological sites in this area is minimal. Records indicate no potential for additional historic structures directly in the project acreage. Since 5DV711 has been determined not eligible for NRHP nomination, GSA building development will not affect the historic setting of any significant historic properties in its surroundings. The height of the proposed facility is comparable to the surrounding infrastructure and will not exceed 85 feet; there will be no impact to the visual setting of any significant historic properties. SWCA recommends that the project proceed after federal approval of this document and proper involvement of consulting parties including the State Historic Preservation Office.

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INTRODUCTION

On May 3, 2007, SWCA Environmental Consultants (SWCA) conducted a cultural resources file search of approximately 9.893 acres (ac) (430,955 square feet [sq ft]) and immediately surrounding areas in Denver, Colorado (Figure 1). This Class I cultural review was conducted on behalf of Waterstone Environmental Hydrology and Engineering, Inc. (Waterstone) for the office building construction by the General Services Administration (GSA) for the Federal Bureau of Investigation (FBI) Denver Division Office. The search was conducted through the Colorado Office of Archaeology and Historic Preservation (OAHP) COMPASS database, the Colorado State Historic Preservation Office (SHPO) in Denver, and the Government Land Office (GLO) records website (www.glorerecords.blm.gov), as well as other document sources as available.

The 9.893-ac project area is located in the Stapleton Redevelopment Area and is bounded by Quebec Regional Retail Center to the west; 36th Avenue to the north; 35th Avenue to the south; and Ulster Street to the east (Figure 2). The building site is currently vacant and is zoned for all uses except residential. A file search was conducted for a 1-mile (mi) radius around Section 28, Township (T) 3 south (S), Range (R) 67 west (W), which contains the project area.

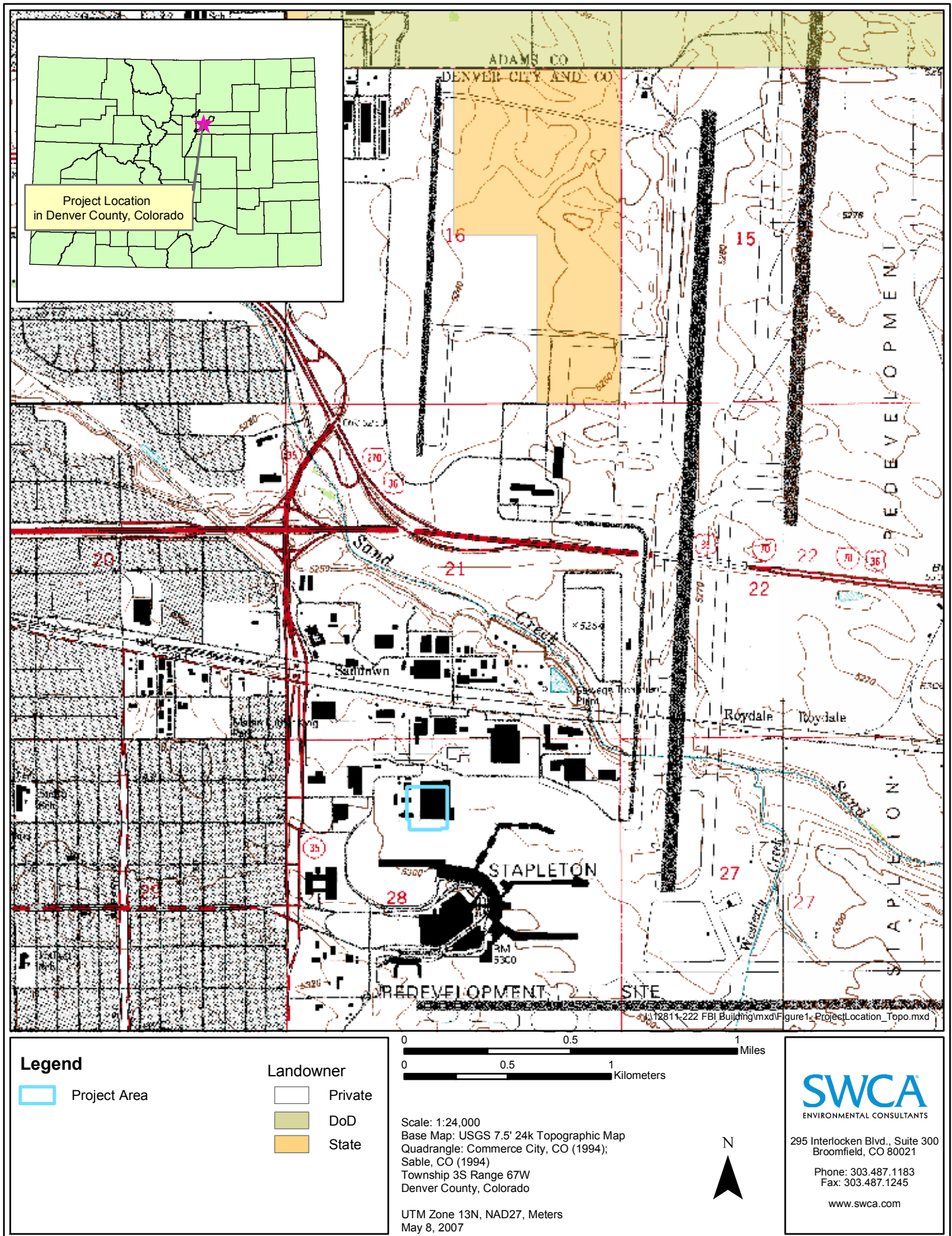
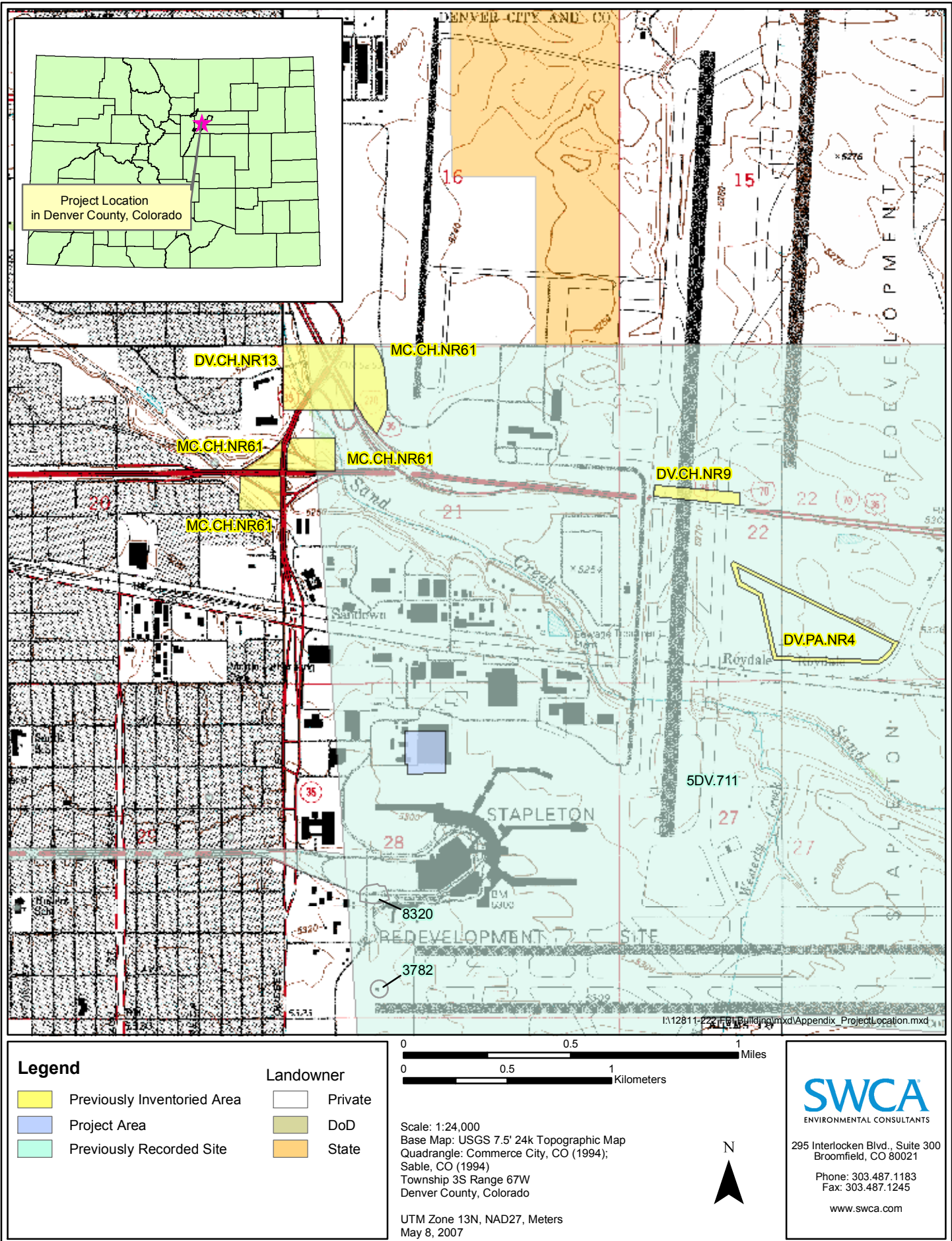


Figure 1. Location of project area at 1:24,000.



Project location map showing previous inventories and sites within the project area.

CLASS I INVENTORY RESULTS

File Search Methods and Information Sources

A literature review and computer file search was performed for a 1-mi radius around Section 28, T3S, R67W through the SHPO, OAHP COMPASS database, and GLO records website (www.glorerecords.blm.gov).

GLO patent records indicate that the majority of the property was originally held privately by several individuals as well as the Kansas and Union Pacific Railway Companies (Table 1). The property was claimed in the initial pre-1900 waves of homesteading; individuals were granted land patents in the project area between 1866 and 1894. Only three patents are located within Section 28, T3S, R67W, which contains the project area: Samuel G. Collins (1871), David L. Hutchins (1871), and Charles B. Kountze (1870).

Table 1. Land Patents Granted Within and Near the Project Location.

Land Patent Grantee	Land Patent Date	Location (T/R/S)
Pedro Benado and Samuel T. Johnson	8/10/1866	T3S/R67W/S20
Charles F. Benett	2/15/1872	T3S/R67W/S20
Benjamin F. Bush	2/15/1872	T3S/R67W/S20
Elizabeth Dearing and Christian Shlegel	6/1/1868	T3S/R67W/S20
Eraitees E. Eastman and Elmina Huestis	10/1/1867	T3S/R67W/S20
John G. Smith	3/10/1876	T3S/R67W/S20
Alabama State and John N. Oder	7/1/1872	T3S/R67W/S21
Ramen Loreya and Gustaus Opitz	8/10/1866	T3S/R67W/S21
Vincent D. Markham and Mark Sanborn	1/10/1867	T3S/R67W/S21
Charles Bangert	6/14/1889	T3S/R67W/S22
George O. Banks, William G. Cook, and Henry Lehwenk	6/1/1868	T3S/R67W/S22
Jacob Breiding	6/14/1889	T3S/R67W/S22
John McCollough and James Patterson	6/1/1868	T3S/R67W/S22
Louis Tessier	6/10/1872	T3S/R67W/S22
Daniel Dolbear and Joseph Pellefigur	12/10/1867	T3S/R67W/S27
Louis Tessier and Judith Thomas	6/1/1868	T3S/R67W/S27
Samuel G. Collins	12/15/1871	T3S/R67W/S28
David L. Hutchins	12/15/1871	T3S/R67W/S28
Charles B. Kountze	5/10/1870	T3S/R67W/S28
Joseph S. Dillon, Daniel Forshay, James E. Griggs, and William B. Shelton	2/15/1870	T3S/R67W/S29
Charles B. Kountze	6/29/1891	T3S/R67W/S29
Eugene A. Manchester	9/18/1894	T3S/R67W/S29
Francis Farmer and Samuel H. Hyot	12/31/1868	T3S/R67W/S32
Charles Gray and Charles JR Lerchen	6/1/1868	T3S/R67W/S32
William Lerehen and Henry P. Robinson	7/1/1868	T3S/R67W/S32

Land Patent Grantee	Land Patent Date	Location (T/R/S)
Henry Stewart	12/15/1870	T3S/R67W/S32
Union Pacific Railway Company	2/18/1891	T3S/R67W/S33
Samuel Birch	12/15/1871	T3S/R67W/S34
James Clelland	6/5/1871	T3S/R67W/S34
Celia Copeland	6/10/1872	T3S/R67W/S34
Thomas Maguire	9/25/1876	T3S/R67W/S34
Joshua Monti	12/15/1871	T3S/R67W/S34
Kansas Pacific Railway Company	4/5/1875	T3S/R67W/S21, 27, 29, 33

T/R/S = Township/Range/Section

The review of OAHP and SHPO records indicated that nine previous cultural resource inventories were conducted within 1 mi of the project boundary. These previous projects consisted of four historic property inventories, one pipeline inventory, one communication line inventory, and three highway project inventories. Information about each inventory is presented below (Table 2).

Table 2. Previous Inventories near the Project Vicinity.

OAHP Project Number	Project Name	Location (T/R/S)	Inventory Type
AM.LG.R3	City of Aurora Centennial House Historic Property Cultural Resources Inventory, Adams County, Colorado (Marcia J. Tate)	T3S/R67W/S34	Block
DV.CH.NR13	Quebec Street Improvements Environmental Review Results of Cultural Resource Investigations, Denver County, Colorado (Gordon C. Tucker, Jr.)	T3S/R67W/S16 T3S/R67W/S21	Block
DV.CH.NR9	Stapleton Airport Tunnels, Denver County, Colorado (Daniel A. Jepson)	T3S/R67W/S2 T3S/R67W/S22	Linear
DV.CH.NR4	A Class III Cultural Resource Inventory for a Proposed Pipeline Relocation Corridor, Stapleton International Airport, Denver County, Colorado (Heidi Guy Hays)	T3S/R67W/S22	Linear
DV.SHF.R111	Historical and Architectural Survey of Selected Denver Public Schools, Denver County, Colorado (R. Laurie Simmons and Thomas Simmons)	Multiple, including T3S/R67W/S29 T3S/R67W/S32 in the current study area	Irregular Survey Area

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OAHP Project Number	Project Name	Location (T/R/S)	Inventory Type
MC.CH.NR61	Archaeological Survey of Highway Project I-70, Quebec Street to I-270, Denver and Adams Counties, Colorado (Susan T. Baugh and Craig Birrel)	T3S/R67W/S16 T3S/R67W/S20 T3S/R67W/S21 T3S/R67W/S17	Multiple/Block
MC.CH.R96	Interstates 25, 70, 225, and 270, and U.S. Highways 13 and 470 for the proposed Adesta Communications Fiber Optic System, Las Animas, Huerfano, Pueblo, El Paso, Douglas, Arapahoe, Denver, Adams, Weld, Larimer, Mesa, Garfield, Eagle, Clear Creek, Jefferson, Elbert, Lincoln, Kit Carson, Costilla, Alamosa, Rio Blanco, Moffat Counties, Colorado (Stephen Sherman et al.)	Multiple, including T3S/R67W/S16 T3S/R67W/S20 T3S/R67W/S21 in the current study area	Linear
MC.FC.R1	MFS Network Technologies Denver Metro Backbone Routes #1 and #1A, Denver and Adams Counties, Colorado (Terri McBride)	Multiple, including T3S/R67W/S20 T3S/R67W/S21 T3S/R67W/S22 in the current study area	Linear
MC.LG.R15	Aurora Historic Preservation Inventory, Adams and Arapahoe Counties, Colorado (Vicki Sandstead et al.)	T3S/R67W/S34	Multiple; dispersed property

T/R/S = Township/Range/Section

Reviews of the OAHP and SHPO databases indicated that 252 previously recorded sites are within 1 mi of the project boundary (Table 3 and Appendix A). The majority (98 percent) of these sites are historic and consist of homes, buildings, and schools. Only two prehistoric open camps (5DV5 and 5DV16) and one paleontological site (5DV17) were recorded in this vicinity. Out of 252 sites, 1 site is field eligible, 1 site is field needs data, and 157 sites are field not eligible. Sites that have field eligibility recommendations have been determined by the consultant and have not been reviewed by the SHPO. Nine sites have been determined officially eligible and 42 sites have been determined officially not eligible by the SHPO. Thirty-seven sites have unknown eligibility for National Register of Historic Places (NRHP) listing. Five area sites are listed on the National Register. The current project area is located within the area of one site, 5DV711, the Stapleton International Airport (see Appendix A). This site encompasses approximately 2,701 ac and was first recorded in 1975 during a Historic American Engineering Record (HAER) documentation. 5DV711 has been recommended not eligible for nomination to the NRHP. A more detailed history of the Stapleton International Airport is presented in the culture history section of this report. Due to the high density of sites within a 1-mi radius, only a sample of the sites is shown in Appendix A. Site density was highest in Section 34, thus individual sites are not depicted in this section. This area of high site density near the project area is likely due to the adjacent historic neighborhoods.

Table 3. Previously Recorded Cultural Resources Located Near the Project Area.

Site Number	Location (T/R/S)	NRHP Eligibility Status	Site Type
5AM142	T3S/R67W/S34	Officially not eligible	Historic
5AM158	T3S/R67W/S34	Field not eligible	Historic
5AM159	T3S/R67W/S34	Unknown	Historic
5AM160	T3S/R67W/S34	Unknown	Historic
5AM161	T3S/R67W/S34	Unknown	Historic
5AM162	T3S/R67W/S34	Officially not eligible	Historic
5AM163	T3S/R67W/S34	Unknown	Historic
5AM165	T3S/R67W/S34	Officially eligible	Historic
5AM166	T3S/R67W/S34	Unknown	Historic
5AM167	T3S/R67W/S34	Unknown	Historic
5AM168	T3S/R67W/S34	Unknown	Historic
5AM169	T3S/R67W/S34	Unknown	Historic
5AM170	T3S/R67W/S34	Field not eligible	Historic
5AM171	T3S/R67W/S34	Field not eligible	Historic
5AM172	T3S/R67W/S34	Officially eligible	Historic
5AM173	T3S/R67W/S34	Listed on National Register	Historic
5AM174	T3S/R67W/S34	Officially eligible	Historic
5AM175	T3S/R67W/S34	Field not eligible	Historic
5AM176	T3S/R67W/S34	Field not eligible	Historic
5AM177	T3S/R67W/S34	Field eligible	Historic
5AM178	T3S/R67W/S34	Field not eligible	Historic
5AM179	T3S/R67W/S34	Field not eligible	Historic
5AM180	T3S/R67W/S34	Field not eligible	Historic
5AM181	T3S/R67W/S34	Field not eligible	Historic
5AM184	T3S/R67W/S34	Unknown	Historic
5AM290	T3S/R67W/S34	Field not eligible	Historic
5AM291	T3S/R67W/S34	Field not eligible	Historic
5AM292	T3S/R67W/S34	Field not eligible	Historic
5AM293	T3S/R67W/S34	Field not eligible	Historic
5AM294	T3S/R67W/S34	Officially not eligible	Historic
5AM295	T3S/R67W/S34	Officially not eligible	Historic
5AM296	T3S/R67W/S34	Officially not eligible	Historic
5AM297	T3S/R67W/S34	Officially not eligible	Historic
5AM298	T3S/R67W/S34	Officially not eligible	Historic
5AM299	T3S/R67W/S34	Officially not eligible	Historic
5AM300	T3S/R67W/S34	Field not eligible	Historic

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5AM301	T3S/R67W/S34	Field not eligible	Historic
5AM302	T3S/R67W/S34	Officially not eligible	Historic
5AM303	T3S/R67W/S34	Field not eligible	Historic
5AM304	T3S/R67W/S34	Field not eligible	Historic
5AM305	T3S/R67W/S34	Field not eligible	Historic
5AM306	T3S/R67W/S34	Field not eligible	Historic
5AM307	T3S/R67W/S34	Field not eligible	Historic
5AM308	T3S/R67W/S34	Field not eligible	Historic
5AM309	T3S/R67W/S34	Field not eligible	Historic
5AM310	T3S/R67W/S34	Field not eligible	Historic
5AM311	T3S/R67W/S34	Field not eligible	Historic
5AM312	T3S/R67W/S34	Officially not eligible	Historic
5AM314	T3S/R67W/S34	Officially not eligible	Historic
5AM316	T3S/R67W/S34	Field not eligible	Historic
5AM319	T3S/R67W/S34	Field not eligible	Historic
5AM324	T3S/R67W/S34	Field not eligible	Historic
5AM325	T3S/R67W/S34	Field not eligible	Historic
5AM326	T3S/R67W/S34	Field not eligible	Historic
5AM327	T3S/R67W/S34	Field not eligible	Historic
5AM328	T3S/R67W/S34	Officially eligible	Historic
5AM329	T3S/R67W/S34	Field not eligible	Historic
5AM330	T3S/R67W/S34	Field not eligible	Historic
5AM331	T3S/R67W/S34	Field not eligible	Historic
5AM332	T3S/R67W/S34	Field not eligible	Historic
5AM333	T3S/R67W/S34	Field not eligible	Historic
5AM334	T3S/R67W/S34	Field not eligible	Historic
5AM335	T3S/R67W/S34	Officially not eligible	Historic
5AM336	T3S/R67W/S34	Officially not eligible	Historic
5AM337	T3S/R67W/S34	Officially not eligible	Historic
5AM338	T3S/R67W/S34	Field not eligible	Historic
5AM339	T3S/R67W/S34	Field not eligible	Historic
5AM340	T3S/R67W/S34	Field not eligible	Historic
5AM341	T3S/R67W/S34	Officially not eligible	Historic
5AM342	T3S/R67W/S34	Field not eligible	Historic
5AM343	T3S/R67W/S34	Field not eligible	Historic
5AM344	T3S/R67W/S34	Field not eligible	Historic
5AM345	T3S/R67W/S34	Field not eligible	Historic

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Site Number	Location (T/R/S)	NRHP Eligibility Status	Site Type
5AM346	T3S/R67W/S34	Field not eligible	Historic
5AM347	T3S/R67W/S34	Field not eligible	Historic
5AM349	T3S/R67W/S34	Field not eligible	Historic
5AM350	T3S/R67W/S34	Field not eligible	Historic
5AM351	T3S/R67W/S34	Field not eligible	Historic
5AM352	T3S/R67W/S34	Field not eligible	Historic
5AM353	T3S/R67W/S34	Field not eligible	Historic
5AM354	T3S/R67W/S34	Field not eligible	Historic
5AM355	T3S/R67W/S34	Field not eligible	Historic
5AM356	T3S/R67W/S34	Field not eligible	Historic
5AM357	T3S/R67W/S34	Field not eligible	Historic
5AM358	T3S/R67W/S34	Field not eligible	Historic
5AM359	T3S/R67W/S34	Field not eligible	Historic
5AM360	T3S/R67W/S34	Field not eligible	Historic
5AM361	T3S/R67W/S34	Field not eligible	Historic
5AM362	T3S/R67W/S34	Field not eligible	Historic
5AM363	T3S/R67W/S34	Field not eligible	Historic
5AM364	T3S/R67W/S34	Field not eligible	Historic
5AM367	T3S/R67W/S34	Field not eligible	Historic
5AM368	T3S/R67W/S34	Field not eligible	Historic
5AM523	T3S/R67W/S34	Officially not eligible	Historic
5AM581	T3S/R67W/S34	Officially not eligible	Historic
5AM981	T3S/R67W/S34	Officially not eligible	Historic
5AM994	T3S/R67W/S34	Officially not eligible	Historic
5AM1128	T3S/R67W/S34	Officially not eligible	Historic
5AM1285	T3S/R67W/S34	Officially not eligible	Historic
5AM1293	T3S/R67W/S34	Officially not eligible	Historic
5AM1294	T3S/R67W/S34	Officially not eligible	Historic
5AM1325	T3S/R67W/S34	Officially not eligible	Historic
5AM1478	T3S/R67W/S34	Unknown	Historic
5AM1479	T3S/R67W/S34	Unknown	Historic
5AM1480	T3S/R67W/S34	Field not eligible	Historic
5AM1481	T3S/R67W/S34	Field not eligible	Historic
5AM1482	T3S/R67W/S34	Field not eligible	Historic
5AM1483	T3S/R67W/S34	Field not eligible	Historic
5AM1484	T3S/R67W/S34	Field not eligible	Historic
5AM1485	T3S/R67W/S34	Field not eligible	Historic

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Site Number	Location (T/R/S)	NRHP Eligibility Status	Site Type
5AM1486	T3S/R67W/S34	Unknown	Historic
5AM1487	T3S/R67W/S34	Unknown	Historic
5AM1488	T3S/R67W/S34	Unknown	Historic
5AM1489	T3S/R67W/S34	Unknown	Historic
5AM1490	T3S/R67W/S34	Unknown	Historic
5AM1491	T3S/R67W/S34	Unknown	Historic
5AM1492	T3S/R67W/S34	Unknown	Historic
5AM1493	T3S/R67W/S34	Unknown	Historic
5AM1494	T3S/R67W/S34	Unknown	Historic
5AM1495	T3S/R67W/S34	Unknown	Historic
5AM1496	T3S/R67W/S34	Unknown	Historic
5AM1497	T3S/R67W/S34	Unknown	Historic
5AM1498	T3S/R67W/S34	Unknown	Historic
5AM1499	T3S/R67W/S34	Unknown	Historic
5AM1500	T3S/R67W/S34	Unknown	Historic
5AM1501	T3S/R67W/S34	Unknown	Historic
5AM1502	T3S/R67W/S34	Unknown	Historic
5AM1503	T3S/R67W/S34	Unknown	Historic
5AM1504	T3S/R67W/S34	Unknown	Historic
5AM1505	T3S/R67W/S34	Unknown	Historic
5AM1506	T3S/R67W/S34	Unknown	Historic
5AM1507	T3S/R67W/S34	Unknown	Historic
5AM1510	T3S/R67W/S34	Officially not eligible	Historic
5AM1527	T3S/R67W/S34	Officially not eligible	Historic
5AM1528	T3S/R67W/S34	Officially not eligible	Historic
5AM1529	T3S/R67W/S34	Officially not eligible	Historic
5AM1536	T3S/R67W/S34	Officially eligible	Historic
5AM1542	T3S/R67W/S34	Officially eligible	Historic
5AM1543	T3S/R67W/S34	Officially not eligible	Historic
5AM1553	T3S/R67W/S34	Officially not eligible	Historic
5AM1564	T3S/R67W/S34	Officially not eligible	Historic
5AM1566	T3S/R67W/S34	Field not eligible	Historic
5AM1567	T3S/R67W/S34	Field not eligible	Historic
5AM1568	T3S/R67W/S34	Field not eligible	Historic
5AM1569	T3S/R67W/S34	Field not eligible	Historic
5AM1570	T3S/R67W/S34	Field not eligible	Historic
5AM1571	T3S/R67W/S34	Field not eligible	Historic

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Site Number	Location (T/R/S)	NRHP Eligibility Status	Site Type
5AM1572	T3S/R67W/S34	Field not eligible	Historic
5AM1573	T3S/R67W/S34	Field not eligible	Historic
5AM1574	T3S/R67W/S34	Field not eligible	Historic
5AM1575	T3S/R67W/S34	Field not eligible	Historic
5AM1576	T3S/R67W/S34	Field not eligible	Historic
5AM1577	T3S/R67W/S34	Field not eligible	Historic
5AM1578	T3S/R67W/S34	Field not eligible	Historic
5AM1579	T3S/R67W/S34	Field not eligible	Historic
5AM1580	T3S/R67W/S34	Field not eligible	Historic
5AM1581	T3S/R67W/S34	Field not eligible	Historic
5AM1582	T3S/R67W/S34	Field not eligible	Historic
5AM1583	T3S/R67W/S34	Field not eligible	Historic
5AM1584	T3S/R67W/S34	Field not eligible	Historic
5AM1585	T3S/R67W/S34	Field not eligible	Historic
5AM1587	T3S/R67W/S34	Field not eligible	Historic
5AM1588	T3S/R67W/S34	Field not eligible	Historic
5AM1589	T3S/R67W/S34	Field not eligible	Historic
5AM1590	T3S/R67W/S34	Field not eligible	Historic
5AM1591	T3S/R67W/S34	Field not eligible	Historic
5AM1592	T3S/R67W/S34	Field not eligible	Historic
5AM1593	T3S/R67W/S34	Field not eligible	Historic
5AM1594	T3S/R67W/S34	Field not eligible	Historic
5AM1595	T3S/R67W/S34	Field not eligible	Historic
5AM1596	T3S/R67W/S34	Field not eligible	Historic
5AM1597	T3S/R67W/S34	Field not eligible	Historic
5AM1598	T3S/R67W/S34	Field not eligible	Historic
5AM1599	T3S/R67W/S34	Field not eligible	Historic
5AM1600	T3S/R67W/S34	Field not eligible	Historic
5AM1601	T3S/R67W/S34	Field not eligible	Historic
5AM1602	T3S/R67W/S34	Field not eligible	Historic
5AM1603	T3S/R67W/S34	Field not eligible	Historic
5AM1604	T3S/R67W/S34	Field not eligible	Historic
5AM1605	T3S/R67W/S34	Field not eligible	Historic
5AM1606	T3S/R67W/S34	Field not eligible	Historic
5AM1607	T3S/R67W/S34	Field not eligible	Historic
5AM1608	T3S/R67W/S34	Field not eligible	Historic
5AM1609	T3S/R67W/S34	Field not eligible	Historic

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Site Number	Location (T/R/S)	NRHP Eligibility Status	Site Type
5AM1610	T3S/R67W/S34	Field not eligible	Historic
5AM1611	T3S/R67W/S34	Field not eligible	Historic
5AM1612	T3S/R67W/S34	Field not eligible	Historic
5AM1613	T3S/R67W/S34	Field not eligible	Historic
5AM1614	T3S/R67W/S34	Field not eligible	Historic
5AM1615	T3S/R67W/S34	Field not eligible	Historic
5AM1616	T3S/R67W/S34	Field not eligible	Historic
5AM1617	T3S/R67W/S34	Field not eligible	Historic
5AM1618	T3S/R67W/S34	Field not eligible	Historic
5AM1619	T3S/R67W/S34	Field not eligible	Historic
5AM1620	T3S/R67W/S34	Field not eligible	Historic
5AM1621	T3S/R67W/S34	Field not eligible	Historic
5AM1622	T3S/R67W/S34	Field not eligible	Historic
5AM1623	T3S/R67W/S34	Field not eligible	Historic
5AM1624	T3S/R67W/S34	Field not eligible	Historic
5AM1625	T3S/R67W/S34	Field not eligible	Historic
5AM1626	T3S/R67W/S34	Field not eligible	Historic
5AM1627	T3S/R67W/S34	Field not eligible	Historic
5AM1628	T3S/R67W/S34	Field not eligible	Historic
5AM1629	T3S/R67W/S34	Field not eligible	Historic
5AM1630	T3S/R67W/S34	Field not eligible	Historic
5AM1631	T3S/R67W/S34	Field not eligible	Historic
5AM1632	T3S/R67W/S34	Field not eligible	Historic
5AM1633	T3S/R67W/S34	Field not eligible	Historic
5AM1634	T3S/R67W/S34	Field not eligible	Historic
5AM1635	T3S/R67W/S34	Field not eligible	Historic
5AM1636	T3S/R67W/S34	Field not eligible	Historic
5AM1637	T3S/R67W/S34	Field not eligible	Historic
5AM1638	T3S/R67W/S34	Field not eligible	Historic
5AM1639	T3S/R67W/S34	Field not eligible	Historic
5AM1640	T3S/R67W/S34	Field not eligible	Historic
5AM1641	T3S/R67W/S34	Field not eligible	Historic
5AM1642	T3S/R67W/S34	Field not eligible	Historic
5AM1643	T3S/R67W/S34	Field not eligible	Historic
5AM1644	T3S/R67W/S34	Field not eligible	Historic
5AM1645	T3S/R67W/S34	Field not eligible	Historic
5AM1646	T3S/R67W/S34	Field not eligible	Historic

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Federal Bureau of Investigation Denver Division Office, Denver, Colorado*

Site Number	Location (T/R/S)	NRHP Eligibility Status	Site Type
5AM1647	T3S/R67W/S34	Field not eligible	Historic
5AM1648	T3S/R67W/S34	Field not eligible	Historic
5AM1649	T3S/R67W/S34	Field not eligible	Historic
5AM1650	T3S/R67W/S34	Officially not eligible	Historic
5AM1719	T3S/R67W/S34	Officially not eligible	Historic
5AM1722	T3S/R67W/S34	Officially not eligible	Historic
5AM1771	T3S/R67W/S34	Field not eligible	Historic
5AM1869	T3S/R67W/S34	Officially not eligible	Historic
5AM1870	T3S/R67W/S34	Officially not eligible	Historic
5AM1931	T3S/R67W/S34	Officially not eligible	Historic
5AM1937	T3S/R67WS35, 34	Field not eligible	Historic
5DV5	T3S/R67W/S20	Unknown	Prehistoric
5DV16	T3S/R67W/S20	Unknown	Prehistoric
5DV17	T3S/R67W/S20	Unknown	Paleontological
5DV159	T3S/R67W/S32	Listed on the National Register	Historic
5DV711	T3S/R67W/S15, 16, 21, 22, 27, 26, 28, 33, 34	Field not eligible	Historic
5DV711.1	T3S/R67W/S21	Officially not eligible	Historic
5DV1642	T3S/R67W/S33	Field needs data	Historic
5DV2068	T3S/R67W/S33	Officially eligible	Historic
5DV2089	T3S/R67W/S33	Officially eligible	Historic
5DV3505	T3S/R67W/S32	Officially not eligible	Historic
5DV3782	T3S/R67W/S28	Unknown	Historic
5DV5318	T3S/R67W/S31, 32	Listed on National Register	Historic
5DV5323	T3S/R67W/S32, 5, 8	Listed on National Register	Historic
5DV5325	T3S/R67W/S31, 32	Listed on National Register	Historic
5DV7048	T3S/R67W/S22	Officially eligible	Historic
5DV8002	T3S/R67W/S32	Officially not eligible	Historic
5DV8014	T3S/R67W/S33	Officially not eligible	Historic
5DV8054	T3S/R67W/S29	Field not eligible	Historic
5DV8064	T3S/R67W/S32	Field not eligible	Historic
5DV8320	T3S/R67W/S30, 29, 28	Officially not eligible	Historic

T/R/S = Township/Range/Section

Culture History

Prehistoric Context

The project area is in the northern Colorado River Basin as defined by the Prehistoric Context for the Platte River Basin (Gilmore et al. 1999). The Platte River Basin was used by a variety of Native American groups throughout all of prehistory, known to begin with Clovis if not earlier hunters at the end of the Pleistocene and continuing through to the onset of European occupation of the region (Gilmore et al. 1999). The context provides a comprehensive overview and summary of our knowledge of prehistoric and early historic developments of the region.

The Paleoindian stage, ranging from 12,400 to 5740 B.C., represented the earliest known human migrations to the New World, influenced by the environmental conditions of the Pleistocene era. Projectile points associated with this stage are found mostly along rivers, which provided habitat suited for megafauna. An emphasis in big-game hunting is indicated for the highly mobile peoples of the Paleoindian stage. Paleoindian people also gathered roots, nuts, and berries, and hunted small game. Paleoindian technology is characterized by regionally similar tools, necessitated by a highly mobile, big-game hunting lifestyle. The Paleoindian stage in the Platte River Basin includes three periods designated as the Clovis, Folsom, and Plano. In addition to these periods, Pre-Clovis occupation is evidenced in the Platte River Basin. Three sites have been recorded and investigated that lend substantiation to this early activity, two sites located near the east edge of the Colorado border and one site located approximately 20 mi southwest of Denver (Gilmore et al. 1999).

Clovis sites (12,040–9750 B.C.) are rare, but six have been discovered in the Platte River Basin. Four of these Clovis sites are within an approximately 50-mi radius of the current project area. Twenty-three Folsom sites (11,340–8720 B.C.) have been identified in the Platte River Basin. One Folsom site is relatively close the project area while one is within 30 mi. The Plano period (10,850–5740 B.C.) is more substantial with 46 sites being recorded within the region, 5 of which are located within a 50-mi radius of the current project area (Gilmore et al. 1999).

In the Platte River Basin, the Archaic stage developed and lasted from approximately 5500 B.C. to A.D. 150. During this stage, the native populations developed subsistence and settlement patterns in response to the fluctuating environmental conditions that existed at the time. During the Early Archaic (5500–300 B.C.), the mountains and foothills were cool and wet, while the plains were hotter and drier. Early Archaic projectile points tended to be large, side-notched dart points. Twenty-six sites are attributed to the Early Archaic in this region; only two of these sites are within a 30-mi radius of the project area. The Middle Archaic (3000–1000 B.C.) saw a return to a cooler climate throughout the region and a subsistence pattern based on a broader range of plants and animals. An increase in grinding devices, lanceolate projectile points, stemmed projectile points with concave bases, and corner-notched Elko series projectile points are common for this period. Archaeologists have recorded at least 35 Middle Archaic sites in the Platte River Basin. These sites are especially centered on the foothill transition zone west of Denver. Two Middle Archaic sites have been recorded within a 50-mi radius of the project area. Late Archaic (1000 B.C.–A.D. 150)

populations are characterized by larger sites that were occupied for a longer extent and were more intensively used than sites of the Middle Archaic. Projectile points from the Late Archaic are generally large corner-notched and side-notched styles (Zier and Kalasz 1999:100-136). At least 40 Late Archaic sites have been recorded in the Platte River Basin, none of which are within close proximity to the current project area (Gilmore et al. 1999).

In the Platte River Basin, the Late Prehistoric stage dates from A.D. 150 to 1540 and is divided into two periods: Early Ceramic (A.D. 150–1150) and Middle Ceramic (A.D. 1150–1540). The Early Ceramic period is represented by the appearance of the bow and arrow, intensified development in bone and shell technology, the appearance of ceramics, and structural surface architecture. Several Early Ceramic sites have been recorded within a 50-mi radius of the project area and approximately 67 sites have been recorded within the Platte River Basin. During the Middle Ceramic period, a semi-sedentary settlement pattern developed and architecture became more prevalent and diverse, pottery became more diversified, and projectile points were smaller and triangular with side-notches or were un-notched. At least 31 Middle Ceramic sites have been identified in this region, three of which are in close proximity of the project area (Gilmore et al. 1999).

The Protohistoric period (A.D. 1540–1860) is defined to begin with the contact of native populations and Europeans, ends with the European domination of the region, and includes the introduction of horses (Gilmore et al. 1999). At least 26 Protohistoric sites have been recorded in the Platte River Basin; no Protohistoric sites have been identified near the current project area.

Historic Context

To those living in the power centers of the East Coast in the early nineteenth century, the area now known as Colorado was a distant, remote wilderness. The Spanish, however, had made forays into the region since the late eighteenth century, attempting to establish trading relationships with the Native American groups who occupied the area. Throughout the early nineteenth century, trading and trapping were the primary activities of the small non-Native population in the area. When precious metal deposits were discovered in the 1850s, miners, their families, and those who hoped to cash in on the mining industry flooded into Colorado. Although mining was the backbone of the economy of the state until the late nineteenth century, industries including farming, ranching, coal mining, and other support industries, developed in conjunction with efforts to extract precious metal from the earth. Immigrants from around the country and around the world streamed into the state to supply labor to the burgeoning industries. The late nineteenth century was a time of change, and the economy of the state diversified. Farming, ranching, banking, tourism, and health industries grew in importance.

Linked by common statehood, the various regions of Colorado possess a common heritage, but each area maintains distinct characteristics and specific historical development. For this reason it is important to approach the historical cultural resources in Colorado with both an understanding of how individual sites are shaped by regional and statewide processes and how the actions of people who occupied these sites helped shape and create these processes.

The Louisiana Purchase in 1803 brought about confusion over national borders between the American and Spanish governments, which resulted in Spanish patrolling of the northern plains and the present site of Denver until 1819. That year, the Adams-Obis Treaty was signed by both governments, resolving the dispute over where the boundary between American lands and Spanish lands was located, and American exploration of the region greatly increased (Mehls 1984). Exploration efforts were concentrated along the South Platte River. During the Oregon Migration of the 1840s, particular attention was paid in this region to the discovery of alternative routes for travelers moving west (Mehls 1984). Americans also patrolled the northern Colorado plains to control the Native Americans in the region and reduce the threat of raiding to American settlers and trappers traveling through the area.

Several trading forts were established in the 1830s and early 1840s, including Fort Vasquez, Fort St. Vrain, Fort Lupton, and Fort Jackson. The presence of these forts made northeastern Colorado a popular winter and exchange destination for trappers (Mehls 1984). In the 1840s, the traders and trappers fell on hard times when the fur market crashed. Simultaneously, trappers experienced a severe reduction in the number of pelts they were able to obtain due to over-hunting of certain species. Many forts closed later in the 1840s, and the trading entrepreneurs moved elsewhere. Afterward, a sparse number of mountain men settled in the region, selling necessary goods to migrating settlers traveling through the region, or farming (Mehls 1984).

The Colorado gold rush of 1859 attracted a completely different wave of people to the northern plains regions. Because of the sheer volume of fortune seekers to the area, this region of the state became the cradle of permanent Anglo settlement and the American government's push for Colorado's statehood (Mehls 1984). Unsuccessful miners tried their hand at farming the plains, and entrepreneurs chasing the growing population's need for goods and services were integral to the establishment of Denver, as was the discovery of gold in Dry Creek, Cherry Creek, and Fountain Creek Canyon. Although the small and quickly depleted gold deposits in the area eventually produced a reverse migration, many people, especially commercial business owners, chose to stay to permanently establish a supply center for mountain mining communities in the southern Rocky Mountains (Mehls 1984). The introduction of the railroad in Denver in 1870 meant that Denver was finally connected to a nationwide system of cities and transportation. This period also saw a large amount of conflict between American settlers and soldiers and the Native American groups who had previously moved freely through northeastern Colorado on a seasonal basis. One of the most disastrous of these violent encounters occurred at Sand Creek in November 1864.

The post-1900 period along the Front Range and on the northern plains is characterized by advances in agricultural techniques. Irrigated crops were dominated by sugar beets, and dryland farming techniques and crops were improved. With the advent of the automobile, tourist trade increased, and railroads began to decline in importance as many goods began being shipped by truck. During the first half of the twentieth century, Denver became a large urban area specializing in regional energy development, distribution of goods and services, and a regional administrative center with both state and federal offices.

In the mid-nineteenth century, military and engineering expeditions crossed the state in search of a route for the transcontinental railroad. A series of expeditions were conducted between

1859 and 1876. Those conducted after the Civil War were undertaken by the United States Geological Survey (USGS) and were focused on cataloging and mapping the land for future development.

The earliest mining activities in Colorado were conducted by small groups of people or individuals. Those who participated in mining were generally not professional miners but young men who came to Colorado in search of their fortunes or adventures. Between 1858 and 1868, miners used traditional placer mining methods that were labor intensive but inexpensive in relation to capital expenditure. These methods included digging gravels from streambeds near watercourses and then washing them with water. Tools and material culture associated with the work of mining included picks, shovels, pans, and more complex systems that included reservoirs, sluices, rockers, and arrastras. During this period, population was fluid and transitory. As placer deposits were discovered, developed, and then exhausted, entire towns and settlements came and went. Toward the end of the 1860s, placer deposits were depleted. New technologies and a new organization of labor developed to replace the pick-and-shovel, individual claim owner, and placer mining.

Although mining was the major impetus in the early settlement of Colorado, after the panic of 1893, economic endeavors in the state diversified. This diversification included a greater emphasis on farming and ranching in the state. From the beginning, however, these activities were integrally linked with the growth of Colorado. While some of the first farming efforts in the south-central and southeast plains were aimed at subsistence, other early farming efforts were focused on supplying food to the mining camps and towns in the mining regions and urban areas. The major crops in Colorado included various fruits, sugar beets, wheat, corn, and alfalfa.

Homesteading was based upon the idea that free land was the birthright of Americans, and the *Homestead Act* was passed in 1862. Every man had a right to a share of the soil, and the public lands belonged to the people and should be freely granted to them in small tracts. The act allowed heads of households or single individuals at least 21 years of age to file for 160 ac of land, with some provisions for the quality of the land to be claimed. The homesteader was required to live on the property for five years and to bring a portion under cultivation. At the time when homesteaders “proved up,” they were required to publish their intentions in a local newspaper. This was designed to provide a check, allowing neighbors to protest a fraudulent claim.

Fairly rapidly, it became obvious that the more arid lands in the west would require larger claims to make homesteading economically viable. In 1877, the *Desert Land Act* was passed. This act allowed for claims of 320 ac, some of which could be combined with prior entries. There was no residence requirement for the *Desert Land Act*, but the claimants had to prove that they had expended \$1.00 per ac towards irrigation projects. To obtain a final patent, the claimant proved such expenditures in the form of a map of the irrigation system with details regarding the source and volume of the system’s water and how it was to be maintained in the future. After 1900, the upper limit of land that could be claimed was pushed to 480 ac. Claimants could prove up after three years, but they could lose their claim if it took more than four years to complete their irrigation.

In the twentieth century, the trend towards larger parcels continued. Once again tailored to the west, the *Enlarged Homestead Act* was passed in 1909. Like the original *Homestead Act* of 1862, the land needed to be inhabited to be proved up; like the *Desert Land Act*, the parcels were 320 ac in size. The grants were available for nonirrigable, nonmineral lands without merchantable timber in a number of western states including all the Four Corners states. Close on the heels of the *Enlarged Homestead Act* was the *Stock Raising Homestead Act* of 1916, which allowed for grazing homesteads of 640 ac. To prove up, claimants had to make permanent improvements for stock raising, such as fences, corrals, or watering holes totaling \$1.25 per ac (the actual purchasing price of land classified for grazing).

Both the *Enlarged Homestead Act* and the *Stock Raising Homestead Act* were attempts to put marginal land into use. However, even at an entire section, most parcels were not large enough to graze the livestock necessary to maintain a family. Many ranchers grazed their herds illegally on public land, even going so far as to build fences. The public domain was overgrazed and nearly completely unregulated. After a long congressional fight, the *Taylor Grazing Act* was passed in 1934. This act provided for grazing districts and leases on other public lands. After signing the law, President Franklin D. Roosevelt withdrew from nonmineral entry most vacant, unreserved, and unappropriated public lands in the West, effectively drawing the age of homesteading to a close.

Irrigation was an extremely important element in the development of Colorado's farmlands. The first farmers in Colorado were essentially businessmen, planting crops to supply the booming mining districts and the growing urban areas. The first irrigation projects in Colorado were undertaken by individual farmers and local cooperative irrigation projects. The success of irrigated farming led to settlement along all the major watercourses of Colorado's plains by the end of the nineteenth century. It also led to the realization by farmers and the federal government that water and larger tracts of land were needed for successful farming of the high plains.

Some of Colorado's communities owed their existence to gold fields; others to advantageous sites providing access and supplies to the mining areas and farms, some to their location along strategic railroad lines. However, from the very beginning, town building was a risky business in Colorado. As mining sources came and went, and as farming and ranching endeavors began and then faltered, towns and villages followed. In the last quarter of the nineteenth century, however, several major urban centers took shape.

Founded as a mining camp, the city of Denver grew quickly. The population expanded from a few hundred settlers in 1859, to nearly 36,000 in only 20 years. By the turn of the century, the town had grown to nearly 135,000 people. Originally settled as a supply and transportation center for the remote mining districts, Denver grew and diversified to become an important commercial, banking, transportation, and to some extent industrial center by the early twentieth century. Denver's links to other major cities in the region and country via railroad lines was an essential ingredient to the development of the city. Enormously wealthy mine owners and poor immigrants alike were attracted to this growing urban center and eventual state capital. The presence of these diverse groups of people gave Denver its unique character.

Historic Context of the Project Area

Although the surrounding regions supported mines, railroads, canals, and historic homesteads, the current project is situated on what was once ranching and farming lands. Individuals and families began dry farming along the South Platte River in 1859. They raised cattle, vegetables, grain, and hay to sell to miners (Clark et al. 1997). Sheep and cattle ranching met with success in the late 1860s to 1880s when many ranchers grazed stock on unoccupied federal lands. However, maps (Noel et al. 1994 as cited in Clark et al. 1997) show that by 1900 no sheep or cattle were ranged adjacent to the project area. Although agricultural colonies were established throughout the region in the 1870s, none were founded in the vicinity of the project area (Clark et al. 1997). Even though Denver was experiencing development arising from the establishment of railroads and neighborhoods, the areas surrounding the project remained devoid of activity until the construction of the Denver Municipal Airport in 1929.

The airport was conceived in 1923 by its founder and then-mayor-of-Denver, Benjamin F. Stapleton. Stapleton believed that, in order for Denver to keep its position on the main lines of transportation, a municipal airport was needed. The city of Denver needed a point of centralization for the growing aviation industry. The area Stapleton chose, 6 mi east of Denver often called “The Sand Dunes” or “Rattlesnake Hollow,” was ideal because it was away from downtown development and located where land prices were lower. At that time the land was used mainly as pasture for dairy farming (Ballast 1995). As Stapleton pushed for support of the airport, substantial opposition was mounting within the City Council as well as at The Denver Post, which dubbed the idea “Stapleton’s Folly” and “Simpleton’s Sand Dunes” (Norgren 1982). However, the political clout of Stapleton could not be denied and the Denver City Council agreed to purchase the 640-ac site for \$143,013.37 (\$233/ac) on March 25, 1928. The municipal airport opened in October of 1929 with a final cost of \$430,000 (Ballast 1995; Stapleton Denver 2007).

Belying skeptics, the airport was an instant financial triumph. Notable events in the early years of the Denver Municipal Airport include a visit by Amelia Erhart in 1931 and, in 1938, the first control tower became operational. In 1944, the City of Denver finally gave Mayor Stapleton his due, renaming it Stapleton Airfield (Norgren 1982; Stapleton Denver 2007).

By the 1950s, the Jet Age had arrived and an expansion of the airport was necessary to accommodate the new planes. At that time, additional land was acquired from the Rocky Mountain Arsenal. In 1964, Stapleton Airfield was renamed Stapleton International Airport; although, an international flight would not be scheduled for another four years (Ballast 1995; Stapleton Denver 2007).

Rapid growth of Denver and the aviation industry during the 1970s and 1980s posed more challenges for the future of Stapleton Airport. Inadequate runway space and increased air traffic encouraged Stapleton to expand to more than 4,700 ac by 1985. Growth of air traffic over nearby neighborhoods spawned lawsuits by Park Hill residents and threats of legal action by Adams County to block the further expansion of runways into the Rocky Mountain Arsenal. Thus, in January 1985, the idea to relocate the airport was conceived. By 1988,

Adams County voters approved the annexation of a 35,500-ac parcel of land and Denver voters endorsed this plan in May 1989 (Ballast 1995; Stapleton Denver 2007).

Stapleton International Airport embarked in a new direction as two private organizations, Stapleton Tomorrow and the Stapleton Redevelopment Foundation, undertook a large-scale community planning project that included the development of numerous commercial and residential buildings as well as the creation of jobs, open space, and recreational facilities. The Denver City Council adopted the Stapleton Tomorrow concept plan in June 1991. Since that time Stapleton has been developed commercially and residentially, and now includes schools, supermarkets, and a pediatric clinic (Stapleton Denver 2007).

Stapleton Airport was first inventoried for an intensive HAER documentation in July 1975 by J.R. Baker of the University of Colorado for the Colorado Historical Society (Baker 1975). The structures were described as being in excellent condition and numerous photographs were taken of the hangars and other out buildings. The airport was first bounded as an historic site in 1982 (Norgren 1982). In 1982, the site condition was described as totally disturbed and the entirety of the site was recommended not eligible for nomination to the NRHP. None of the early buildings from the 1920s and 1930s remained at the airport during the time of the 1982 recording. Although no evidence of the 1920s and 1930s buildings was noted by Norgren (1982), she did record two hangars (Hangars 5 and 6) that she dated to the 1940s. She speculated that these hangars would be destroyed during the 1986 expansion of runways. Based on a drafting schematic, the current project area is likely located on the former site of these two hangars (Zylstra Baker Surveying, Inc. 1997). The 1950 USGS topo map does not depict structures at this location. It is possible that Hangars 5 and 6 were omitted from the 1950 USGS topo map or the hangars were constructed after 1950. However, a building, or two connected buildings, is depicted at this location on the 1957, 1965, 1971, and 1994 USGS topo map. The same structures are also depicted on a 1951 Certified Sandborn® drafting schematic and the 1954 aerial photograph of the project area (Environmental Data Resources, Inc. 2007; Waterstone 2007). Currently, no standing structures are visible in the aerial photograph of the project area (National Agriculture Imagery Program [NAIP] 2005) (see Figure 2). It is likely that the location of Hangars 5 and 6 has been reused repeatedly over the years and could account for inconsistencies between the USGS topo maps and current aeriels.

Soil and Environmental Data

Using data recently made available for the project area, the soils in the area are classified as ascalon sandy loam, ranging in slope between 1 and 5 degrees (Natural Resource Conservation Service [NRCS] 2007). The soils survey did not indicate that there were deeply buried soils within the project area and the project area had been intensively developed and grazed in the past. No evidence exists documenting the dunes of the “Simpleton’s Sand Dunes” in the specific project area. Use of the project area as a hangar site and subsequent demolition of the structures have likely resulted in substantial disturbance of the surface and underlying soils. Therefore, it is unlikely that any intact surface or subsurface cultural remains are present within the project area.

SUMMARY AND CONCLUSION

The Class I file search revealed that 252 previously recorded cultural resources and 9 previous cultural inventories are located with a 1-mi radius around the project area. The majority of these cultural resources are historic sites as a result of numerous historic neighborhoods, buildings, and schools being located adjacent to the project area. Information compiled during the Class I cultural resource file search of the area of the proposed office building construction for the FBI, Denver Divisions Office indicates that the land was historically utilized as rural agricultural land as well as by the Denver Municipal Airport and its various iterations. The airport expanded in response to growth in the aviation industry during the past 50 years, but use was discontinued in 1989 with the development of the Denver International Airport farther east. Since 1989, the Stapleton International Airport has been transformed into an area offering numerous residential and commercial opportunities. Although the original Stapleton International Airport (5DV711) itself is a historic site, it has been recommended officially and determined not eligible for nomination to the NRHP and the likelihood of encountering intact historic remains associated with airport use is low. Only two prehistoric open camp sites (5DV5 and 5DV16) and one paleontological site (5DV17) have been recorded in the land immediately surrounding the project area. An examination of soil data concluded that potential for deeply buried soils does not occur within the project area.

Due to previous disturbance and current redevelopment of the project area, it can be extrapolated that the potential of encountering sites, prehistoric or historic in nature, is minimal. Only one site, 5DV711 (Stapleton International Airport), overlaps the project area. Records indicate no potential for additional historic structures directly in the project acreage. Since 5DV711 has been determined not eligible for NRHP nomination, GSA building development will not affect the historic setting of any significant historic properties in its surroundings. The height of the proposed facility is comparable to the surrounding infrastructure and will not exceed 85 feet; there will be no impact to the visual setting of any significant historic properties. SWCA recommends that the project proceed after federal approval of this document and proper involvement of consulting parties (e.g., SHPO).

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