

**INTEGRATED CULTURAL RESOURCE MANAGEMENT PLAN
FOR FORT GORDON, GEORGIA**



January 2011

**DEPARTMENT OF THE ARMY
UNITED STATES ARMY GARRISON
FORT GORDON, GEORGIA**

INTEGRATED CULTURAL RESOURCE MANAGEMENT PLAN

UPDATED JANUARY 2011

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DRAFT
FINDING OF NO SIGNIFICANT IMPACT
Implementation of the Integrated Cultural Resources Management Plan
Fort Gordon, GA

1.0 Name and Purpose of Action: The proposed action is to implement the Integrated Cultural Resources Management Plan (ICRMP) on Fort Gordon pursuant to Federal, State and Army regulation. The ICRMP is required for lands owned or leased by the Army. Implementation of the ICRMP as proposed would enable the effective management of cultural resources and protect the cultural setting. Plan implementation would support Fort Gordon's continuing need to ensure the safety and efficiency of the facility's mission while practicing sound resource stewardship and complying with environmental policies and regulations.

2.0 Description: The purpose of this Environmental Assessment (EA) is to identify and assess the potential environmental impacts resulting from Implementation of an ICRMP on Fort Gordon. Department of Defense Instruction (DODI) 4715.16 and Army Regulation 200-1 direct each installation to develop an ICRMP. The proposed action is to carry out specific management measures developed in the ICRMP. It focuses on a 5-year period beginning in FY 2011 and continuing through FY 2016. The plan specifically includes archaeological and architectural inventory and evaluation, developing a MOA with Federally recognized Indian Tribes, and pursuing more outreach opportunities. The plan also establishes Standard Operating Procedures (SOP) for reoccurring installation activities, and annual inspection and reporting requirements.

3.0 Alternatives Considered: Two alternatives were considered:

Alternative I: Implementation of the ICRMP on Fort Gordon, Georgia.

Under this alternative, Fort Gordon would carry out specific management measures developed in the ICRMP. It focuses on a 5-year planning period, beginning in FY 2011 and ending in FY 2016, consistent with the timeframe for the management measures as described in the ICRMP. The plan specifically includes archaeological and architectural inventory and evaluation, developing a MOA with Federally recognized Indian Tribes, and pursuing more outreach opportunities. The plan also establishes Standard Operating Procedures (SOP) for reoccurring installation activities, and annual inspection and reporting requirements.

Alternative II: No Action/Status Quo

This alternative refers to continuation of the existing cultural resource management approach without implementation of the proposed action. Implementation of the no action alternative means that Fort Gordon would continue to operate under the 2005 ICRMP, and any updates to the ICRMP, would not be enacted. Current management measures for cultural resources would remain in effect and the existing cultural resource status would continue. In addition, selection of this alternative would preclude Fort Gordon from meeting the DODI 4715.16 and AR 200-1 objectives of updating an ICRMP every five years.

4.0 Anticipated Environmental Effects of Alternatives I and II:

Alternative I requires implementation of proactive measures that are beneficial in nature and will protect the integrity of cultural resources. Additionally no negative cumulative impacts have been identified. There may be minor temporary impacts to some wildlife species during phase II testing of archaeological sites. These can be mitigated by timing disturbance to minimize effects during nesting season for migratory birds or breeding season for other animals. Should land disturbance be required near water or exceed one acre in size, use of proper sediment and erosion control measures and appropriate permitting to protect water quality will be required. A separate NEPA document will be conducted for each investigation and specific mitigation measures will be developed as appropriate.

Alternative II would continue the goals and management practices of cultural resources presented in the existing ICRMP. While the management practices have not changed significantly in the updated ICRMP, many of the cultural resource program goals have changed as the existing goals have been largely completed. As phase II testing is included in the existing ICRMP, land disturbance impacts for this alternative are the same as Alternative I. The only negative impact to Alternative II is that the cultural resource program would be restrained by implementing a plan referring to an outdated 5-year work plan.

5.0 Finding of No Significant Impact (FNSI): This Environmental Assessment was conducted in accordance with the National Environmental Policy Act (NEPA) of 1969, the Council on Environmental Quality (CEQ) regulations, 32 CFR Part 651, AR 200-1, and various applicable environmental laws, regulations, and executive orders. It has been concluded that the preferred alternative, implementation of the Integrated Cultural Resources Management Plan on Fort Gordon does not constitute a “major Federal action significantly affecting the quality of the human environment” when considered in the context of individual and cumulative impacts. Therefore, the preparation of an Environmental Impact Statement (EIS) is not required.

The Army released drafts of both the EA and FNSI for a 30-day review and comment period. The Army notified the public of the availability of the Draft EA and FNSI through publication of a notice in the *Augusta Chronicle*. The Army received no comments from the public.

Based upon my review of the facts and analyses contained in the attached Environmental Assessment, I conclude that Alternative I, implementation of the ICRMP, will have no significant impact on the natural or human environments. Additionally, my review of the public comment process has revealed no new or significant environmental effects or issues of concern.

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Date:

**INTEGRATED CULTURAL RESOURCE MANAGEMENT PLAN FOR FORT
GORDON, GEORGIA**

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2011

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EXECUTIVE SUMMARY

This Integrated Cultural Resources Management Plan (ICRMP) has been prepared in compliance with Army Regulation 200-1 and Department of Defense Instruction 4715.16. It is a five-year plan for the integrated management of cultural resources at Fort Gordon, Georgia. This ICRMP is not a decision document, but it provides the Commander, and those responsible for implementing his decisions, with the information needed to make appropriate decisions about the management of the cultural resources at Fort Gordon. A brief overview of each section of the ICRMP is provided in the Introduction (Section 1) of this document.

The National Historic Preservation Act of 1966 (NHPA) requires the Army to consider the effect of its actions on cultural resources that are eligible for inclusion to the National Register of Historic Places (NRHP). This document focuses on specific actions Fort Gordon must take in order to gain and maintain compliance status with applicable cultural resource protection laws and regulations. Section 2 of this document provides an overview of the basic requirements of federal statutes and regulations applicable to Army activities at Fort Gordon. This document outlines specific actions that must be taken to integrate the military mission of Fort Gordon with the cultural resources program to minimize potential effects to historic properties.

Cultural resources at Fort Gordon include archeological sites and potentially historic structures/buildings. Most of Fort Gordon's property has been surveyed for the presence of archaeological sites and the NRHP eligibility of buildings and structures built between 1942 and 1989. There are 41 archaeological sites that are eligible for the NRHP, while 114 sites are potentially eligible for the NRHP. The historic building surveys determined that no buildings on Fort Gordon were determined eligible for the NRHP. However, the Georgia State Historic Preservation Officer (GA SHPO) recommends Building 33500, Woodworth Library, as eligible for its local and regional architectural significance as few buildings of this style remain intact in Georgia. According to the survey, 42 buildings will need to be reevaluated when they reach 50 years old. Appendix B provides a list of sites (without location data) and building numbers considered eligible or potentially eligible.

The Army is required to protect all of its NRHP eligible properties from any adverse effects related to undertakings, planned or inadvertent, at Fort Gordon. A major element of this ICRMP is a Management Plan (Section 5), which lists 9 Standing Operating Procedures (SOPs) designed to ensure that Fort Gordon stays in regulatory compliance in terms of cultural resource protection. The Environmental Division/Natural Resources Branch (ED/NRB) and the Cultural Resources Manager (CRM) are responsible for implementing the SOPs and will coordinate these efforts with the Installation Commander, Training Unit Field Officers, and the Directorate of Public Works (DPW). These SOPs cover the following topics:

1. Integrate and implement the Fort Gordon Cultural Resource Management Program
2. Section 106 Compliance
3. Section 110 Compliance
4. Inadvertent or Emergency Discovery of Archaeological Deposits Resources

5. Archaeological Resource Protection Act (ARPA) Compliance
6. Curation Procedures
7. Native American Grave Protection and Repatriation Act (NAGPRA) Compliance
8. Maintenance and Access to Cemeteries
9. Actions in Regard to Extensive Alterations to the Facility Mission

The following list of projects will require funding during the five years covered under this ICRMP based on the Five Year Work Plan (Section 4.5):

- Phase I of 119 acres in training areas 23 and 1 missed on previous survey coverage of the installation
- Phase II of sites currently determined potentially eligible
- Survey of historic sites that maintain their integrity causing a discrepancy in the Phase I survey recommendations
- Develop a Memorandum of Agreement or Comprehensive Agreement with affiliated Federally recognized Tribes
- Evaluate the Signal School Headquarters and Classroom Campus for its eligibility as a district
- Outreach tools such as a portable artifact case

1.0 INTRODUCTION

1.1 PURPOSE

The Integrated Cultural Resources Management Plan (ICRMP) is an operational plan for the integrated management of cultural resources located on lands owned or leased by the Army to ensure compliance with federal laws. The ICRMP is not a decision document, but it provides the Commander, and those responsible for implementing his decisions, with the information needed to make appropriate decisions about the management of the cultural resources located on lands owned or leased by the Army. The ICRMP is the installation commander's primary tool for planning and integrating cultural resources compliance and management activities into the military mission.

A cultural resource is any prehistoric or historic place, site, building, structure, or object that was built or fashioned by human beings (see Appendix A for a full discussion of this definition). Various federal statutes and regulations use other wording as interchangeable with the term cultural resource, including historic property, cultural item, archaeological resource, sacred site, and curated collection. A cultural resource can be something as simple as a single arrowhead or broken dish through something as complex as an entire village, town, or city neighborhood. A cultural resource can be very tangible and easy to physically define, as in the case of a Native American mound or a church cemetery. It can also be very intangible, as in the case of Traditional Cultural Properties, which is a cultural resource associated with the traditional beliefs of a particular cultural group.

The ICRMP is designed to assist commanders and staff at Fort Gordon in identifying procedures required to comply with appropriate federal laws and implementing regulations. Among the laws with special consequence to Fort Gordon are the National Historic Preservation Act of 1966, as amended (NHPA), Executive Order (EO) 13007 Indian Sacred Sites dated May 24, 1996, Native American Graves Protection and Repatriation Act of 1995, as amended (NAGPRA), Archeological Resources Protection Act (ARPA) and the American Indian Religious Freedom Act of 1978 (AIRFA). These are individually reviewed in Section 2, *Statutes and Regulations*. Failure to comply with these laws can result in formal notification from the Advisory Council on Historic Preservation (ACHP) to the Secretary of the Army. Such notice can be used by litigants against the Army in a manner that can halt or delay critical mission activities.

Under Army Regulation 200-1, the Installation Commander is responsible for compliance with federal cultural resource laws. Installation commanders are directed to:

- Establish an ICRMP to be used as a planning tool ;
- Designate an installation Cultural Resources Manager (CRM) to coordinate the installation cultural resources management program;

- Contact (via written format) all Federally-recognized Native American tribes with an interest in lands currently occupied by Fort Gordon. Such correspondence must be addressed on a government-to-government level;
- Establish early coordination between the CRM and other installation staff elements, tenants, and others early in the planning of projects and activities that may affect cultural resources;
- Ensure that cultural resources management is integrated with installation training and testing activities;
- Establish funding priorities and program funds for cultural resources compliance and management activities into the Environmental Program Requirements report;
- Conduct a comprehensive evaluation of the installation cultural resources management program;
- Prepare and implement NHPA Section 106 Programmatic Agreements (PA) and Memoranda of Agreements (MOAs), NAGPRA Cooperative Agreements (CA) and Plans of Action, and other documents as appropriate to address NHPA and NAGPRA compliance procedures. Coordinate such documents with the South Eastern Regional Office (SERO) of the Installation Management Agency (IMA) and Headquarters, Department of the Army (HQDA);
- Serve as the agency official as defined in 36 Code of Federal Regulations (CFR) Part 800 with responsibility for installation compliance with NHPA;
- Serve as the federal land manager as defined in 32 CFR 229 with responsibility for installation compliance with ARPA;
- Serve as the federal agency official as defined in 36 CFR 79 with management authority over archaeological collections and associated records;
- Sign NHPA PAs and MOAs, and NAGPRA CAs and Plans of Action and other installation cultural resources agreements after MACOM and HQDA comments have been addressed.

1.2 USING THE ICRMP

1.2.1 Organization and Structure

This ICRMP is organized into the following eight sections.

Section 1 (Introduction) contains primary discussions including the purpose of the ICRMP and how to use the plan. This section also introduces Fort Gordon and reviews its location, history, and military mission. It also provides an overview of the Fort Gordon Cultural Resources Program.

Section 2 (Regulations and Statutes) contains a brief review of preservation laws and regulations that pertain to Fort Gordon, including federal laws, EOs, Presidential Memoranda and Department of Defense (DoD) Directives. This section also discusses penalties for

noncompliance and reviews alternative management options for ensuring compliance with Section 106 of the NHPA.

Section 3 (Planning Level Survey) includes a literature review, site and map file searches to determine the range and types of resources known to be present at Fort Gordon, development of archaeological sensitivity assessments, and historic contexts. Existing inventory results (including NRHP eligibility) are summarized in this section.

Section 4 (Cultural Resources Inventory) addresses the need for any additional field survey or inventory of cultural resources at the base, and proposes schedules for completing such work. The location of specific archaeological sites, historic resources, and traditional cultural properties, and Native American sacred sites are protected from disclosure and such information is excluded from the ICRMP, however these and related disclosure issues are discussed. An inventory schedule is provided to address NHPA undertakings and other compliance requirements, and the development of a baseline inventory for management purposes is also discussed. Installation activities that may affect cultural resources over the 5-year period of the ICRMP are addressed within this section.

Section 5 (Management Plan) addresses the cultural resources requirements of the installation activities discussed in the previous section. Standing operating procedures (SOPs) in regard to the management of cultural resources are discussed within this section of the document. Standard procedures are provided for inadvertent discovery of cultural resources, for emergency actions that could affect cultural resources, and standard treatment measures for cultural resources such as historic buildings and structures.

Section 6 (Public Involvement Plan) several cultural resources statutes and regulations require public and Indian tribal participation in the compliance process. This section provides such a plan, in terms of a list of specific individuals or parties to be contacted and the necessary timing and scheduling of such consultation. To save costs and time, the public involvement plan should be integrated with such efforts associated with NEPA compliance activities, and be coordinated through the installation Public Affairs Office.

Section 7 (Environmental Assessment) the EA is included here as an integral part of the ICRMP and as a requirement of the National Environmental Policy Act (NEPA). The EA includes the purpose and need for the proposed action; a determination of whether or not significant effects would occur from implementing the proposed action; a description of the proposed action and its alternatives; a characterization of existing conditions (the affected environment); known, potential, and reasonably foreseeable environmental consequences (both beneficial and negative) related to the proposed action and its alternatives, including cumulative effects. The public comment process is also described in the EA and in more specific detail in Section 6.

Finally, the following four appendices are included: (A) Glossary of Key Terms, (B) List of Eligible and Potentially Eligible Archaeological Sites and buildings on Fort Gordon (C) List of Tribal Consultation Contacts, and (D) Secretary of the Interior's Standards and Guidelines for Rehabilitation.

1.3 OVERVIEW OF FORT GORDON

1.3.1 Location and Size

Fort Gordon encompasses approximately 55,600 acres in east central Georgia. Fort Gordon's central installation is located at approximately latitude 33°20'N, longitude 82°15'W. The majority of the installation and the entire cantonment area lie within Richmond County, with a small portion of the training area in Jefferson, Columbia, and McDuffie counties. Fort Gordon is located approximately 145 miles east of Atlanta, Georgia and approximately 115 miles northwest of Savannah, Georgia. Augusta, Georgia is the nearest urban center and is located approximately 9 miles northeast of the installation. Fort Gordon is bound to the north by U.S. Highway 78, on the east and south by U.S. Highway 1, and on its western perimeter by U.S. Highway 221. Interstate 20 (I-20), located 2 miles north of the installation, and Interstate 520 (Bobby Jones Expressway, I-520), located 2 miles east of Gate One, provide access to the installation. There are no public roads or highways on the installation (Figure 1.1).

Approximately 50,000 acres (90 percent) of Fort Gordon is used for training missions. The installation is subdivided into 49 training areas (TAs), two restricted impact areas (small arms and artillery), and two cantonment areas (main and industrial). Impact areas occupy approximately 13,000 acres and on-post maneuver and TAs occupy approximately 37,000 acres. The remaining 5,590 acres is occupied by cantonment areas which include military housing, administrative offices, community facilities, medical facilities, industrial facilities maintenance facilities, supply/storage facilities, lakes and ponds, recreational areas, and forested areas.

The installation operates 14 live fire ranges, one dud impact area, one demolition pit, one indoor shoot house, one convoy live fire familiarization course, two military operations on urban terrain (MOUT) site/building clearings and one nuclear, biological, and chemical (NBC) chamber. Training primarily consists of advanced individual signal training and unit employment of tactical communications/electronics operations. Additionally, artillery demolition, aerial gunnery load master drop zone, and airborne troop training are conducted on Fort Gordon.

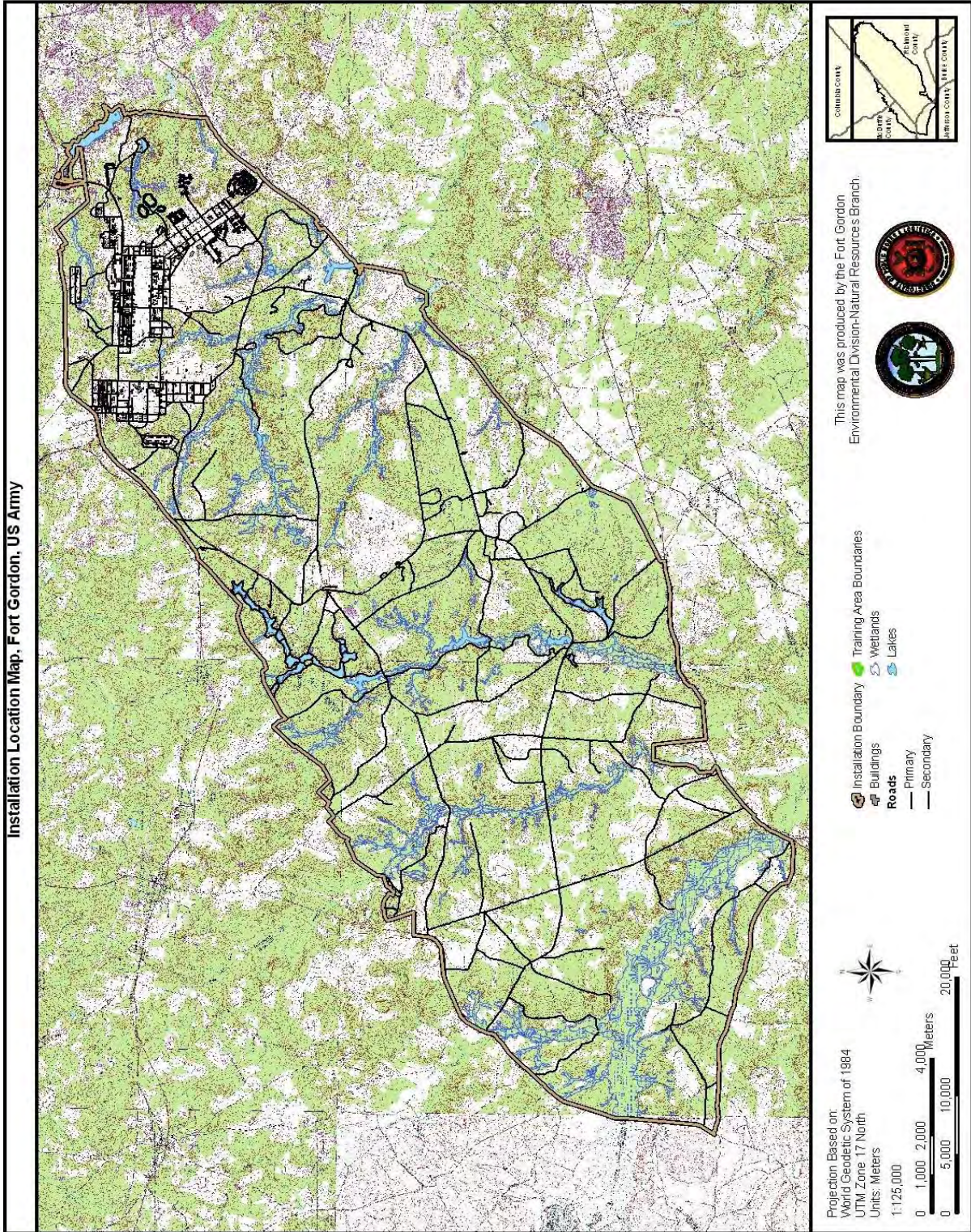


Figure 1: Fort Gordon Location Map

1.3.3 Mission

Fort Gordon is the largest communications training facility (130 courses/16,000 troops per year) in the Armed Forces, and is the focal point for the development of tactical communications and information systems (Fort Gordon 2005). The installation trains soldiers with the most sophisticated communications equipment and technology in existence. The Leader College of information Technology is the U.S. Army's premiere site for all automation training and home to the Regimental Non-Commissioned Officer (NCO) Academy. Fort Gordon is also the home to the U.S. Army Garrison, the Gordon Regional Security Operations Center (GRSOC, including the 116th Military Intelligence Group, the Naval Security Group Activity (NSA), USAF 31st Intelligence Squadron, and Company D – Marine Cryptologic Support Battalion), 63rd Signal Battalion, the Southeast Region Medical Command, the Southeast Region Dental Command, Southeast Region Veterinary Command, DDEAMC, U.S. Army's only Dental Laboratory, 67th Signal Battalion, Regional Training Site-Medical, National Science Center-Army, two deployable brigades (93rd Signal Brigade and 513th Military Intelligence Brigade), a Georgia National Guard Youth Challenge Academy.

As specified in *USASC&FG Regulation 10-8, Manual of Organization, Missions, and Functions*, the general mission assigned the Fort Gordon Command Element is:

Command the U.S. Army Signal Center and Fort Gordon and other U.S. Army personnel and units assigned except those under separate command as specified by higher headquarters. This includes provision of base operations support to tenant and satellite units and activities, organizations, units, and personnel of other military departments and commands; and other departments or agencies of the Government as prescribed in appropriate regulations, directives, and agreements.

More specifically, the installation Mission includes:

- Command and support all assigned TRADOC, Medical Command (MEDCOM), Network Enterprise Technology Command (NETCOM), and Forces Command (FORSCOM) Army Signal School.
- Accomplish planning, training, and coordination as directed for the mobilization mission, and prepare administrative and logical support for mobilization forces, including U.S. Reserve Forces.
- Provide base operations support to tenant and satellite units and activities of other military departments and commands.

At present, there are 27 tenant activities, the largest and most permanent being DDEAMC activities.

1.3.4 Training

The following is a general description of Fort Gordon's training mission. It was developed for use in the installation's Range Development Master Plan and the Army Compatible Use Buffer

(ACUB) proposal. The ITAM Coordinator, DPTMS coordinates mission requirements to be included in the program element plans (*e.g.*, ESMC).

In 2006 a total of 34,594 personnel zeroed and qualified weapons, firing 2.1 million rounds on Fort Gordon ranges. In addition, 68,423 personnel utilized Fort Gordon TAs. Training, maneuver and exercise areas within Fort Gordon boundaries generally occur in the western portion of the installation. Several lakes and ponds are scattered among the woodlands and open areas. This portion of the installation supports abundant wildlife habitats.

Mechanized training historically occurred on Fort Gordon and is currently restricted to the GANGB use. Heavy training impacts on Fort Gordon have been limited to two principal areas. The small arms impact area (SAIA) is located in the center of the installation and encompasses 14 active firing ranges. Heavy artillery detonation occurs in the artillery impact area (AIA) located on the western end of the installation.

Range requirements are based on the training strategies and requirements of Fort Gordon units which include a deployable Theater Tactical Signal Brigade, a Strategic Military Intelligence Brigade, the U.S. Army Signal Center with an organic Signal Brigade (IET), Regimental Noncommissioned Officer and Officer Academies, the School of Information Technology, a Tactical Signal Battalion (non-deployable), and a deployable Military Police Detachment. There is also a Joint Regional Security Operation Center, a U.S. Army Reserve Theater Tactical Signal Brigade, and an Army National Guard Engineer Battalion and Military Police Company (re-stationing effort) on the installation. In addition, three Reserve Component brigade sized medical units and an artillery battalion train on Fort Gordon and utilize its range and TA assets. Special Operations Forces utilize the AIA for aerial gunnery, and the USAF conducts heavy cargo drop training on the Fort Gordon's drop zone day and night, 6 days a week. The unit marksmanship strategies are based on guidance found in U.S. Army Pamphlet (PAM) 350-38, theater deployment and mobilization orders including those defining Soldier Focus Area/Warrior Tasks and Battle Drills requirements, and local command guidance. The units that specifically utilize Fort Gordon are:

- TRADOC – deployable and fixed units with an average strength of 14,500 Soldiers
 - 15th Signal Brigade (15 Companies)
 - 73rd OD Battalion (Three Companies)
 - 442d Signal Battalion / LCIT (Three Companies)
 - Regimental Non-Commissioned Officers Academy (RNCOA, Two Company equivalents)
 - 35th Military Police Company (One Company)
 - 434th Army Band (1 Detachment)
- FORSCOM/NETCOM – deployable units with an average strength of 1,500 Soldiers
 - 35th Signal Brigade (13 Companies)
- Intelligence and Security Command (INSCOM) – fixed and deployable joint units with an average strength of 3,500 service personnel
 - 116th Military Intelligence (MI) GP/National Security Agency Georgia (NSA-GA) (Three Companies)
 - 513th MI Brigade (12 Companies)

- MEDCOM – fixed and deployable with an average strength at 3,000 personnel
 - Eisenhower Medical Center Troop Command (Two Companies)
- 3/160 Special Operations Aviation Regiment (1 Company)
- IMCOM – Headquarters and Headquarters Company U.S. Army Garrison (USAG) (One Company)
- National Guard/Army Reserve – deployable with average strength of 13,200 Soldiers (135 Companies)
- USAF Training Squadron C-130/C-17 Heavy Drops/Pilot/Load Master Training

The Fort Gordon Range and TA complex consists of 14 active ranges including a Convoy Live Fire Course and 12 artillery firing points, with over 700 fixed targets. The ranges are supported by a 7,645-acre SAIA and a 5,217 acre AIA. Adjacent to the ranges are 49 maneuver TAs covering 32,037 acres which is capable of Battalion and Brigade Combat Support, Service Support, Heavy/Light Company level maneuver or Light Airborne Battalion level maneuver. There is sufficient area on the installation to construct a Multi Purpose Range Complex capable of supporting Company and below Stryker operations, although funding would be required to execute ITAM projects in order to make the area more accessible. There is a company sized drop zone embedded in TA 23 that is heavily utilized by the USAF Training Squadrons out of Dobbins Air Force Base (AFB). Fort Gordon's AIA is covered by Restricted Air Space R3004 which supports live fire in the AIA. The range staff is pursuing expansion of R3004, or a SARSA, to enable small arms firing in aircraft over flight areas. Presently, ground observation is used in concert with R3004 to provide early warning to aircraft in the Fort Gordon airspace. Fort Gordon's range staff is comprised of 15 personnel, including five ITAM personnel, that perform management, scheduling, safety oversight, maintenance, land management, LRAM and supply functions for the ranges and maneuver lands.

To add to the list of regular users, there is also field testing of U.S. Army Tank Automotive Research, Development and Engineering Center robotic vehicles. Assorted Federal agencies and local law enforcement personnel (city, county and state) also utilize the training ranges. The annual summer training period sees a large influx of reserve medical training units for the Golden Medic exercise. The Golden Medic exercise occurs over a 3-month period and involves reserve and National Guard medical training units from across the U.S. One of the battalions that comprise the 93rd Signal Brigade may be restationed to Fort Bragg; however, the overall resultant manpower remaining in the 35th Theater Tactical Signal Brigade on Fort Gordon will grow slightly from its present end-strength. The Georgia Army National Guard (GARNG) is going to position a Military Police Company and a Combat Engineer Battalion on the installation as well.

In addition changing mission and training requirements are causing the range and TAs of Fort Gordon to be used in increasingly different ways. Some of the new and expanded mission requirements include:

- Convoy training, including convoy live fire, and qualification record fire (QRF) response (in the future this will include night operations on major training complex roads with the use of night vision devices;
- Improvised Explosive Device situations ingrained into all tactical ground training events;

- Training in a projectile based environment (paintball and Special Effects Small Arms Marking System); and
- Weapons qualifications for all Advanced Infantry Training soldiers.

While the recent Base Realignment and Closure (BRAC) law and Integrated Global Presence Basing Strategy (IGPBS), 2006 – 2011 did not cause major changes in Fort Gordon’s mission, there are mission expansions that can greatly increase the need for housing and lead to development in the local areas. The National Security Agency – Georgia (NSAGA) expansion and construction of a new facility will include approximately 3,500 new jobs when completed in FY 2012. Also, as range and facility availability becomes scarcer on larger installations, Army units will increasingly look to installations like Fort Gordon to meet their training needs.

1.4 CULTURAL RESOURCES MANAGEMENT PROGRAM (CRMP)

AR 200-1 requires each Army installation to have an assigned office and individual responsible for overall management of cultural resources. The Environmental Division/Natural Resource Branch(ED/NRB) within the Directorate of Public Works (DPW), is responsible for compliance with all applicable environmental, natural, cultural, and archaeological Federal, State, and local laws and regulations on Fort Gordon.

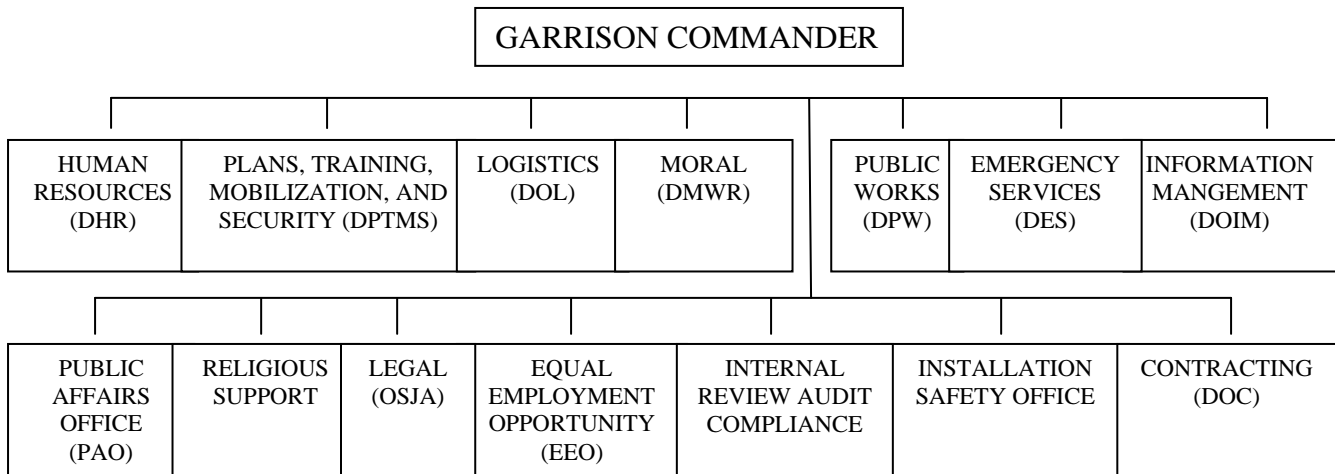


Figure 2: Fort Gordon Garrison Organization Chart

1.4.1 CRMP Summary

Fort Gordon has had a CRMP since 1989, when it began a program of surveying timber tracts for

archaeological resources. The CRMP program originally was managed by the Fort Gordon Head Forester. In 2004, the program was moved under the supervision of the National Environmental Policy Act (NEPA) program manager. Throughout its history, the mission of the CRMP has been to facilitate compliance with applicable legal requirements in order to maintain the availability of Army land areas necessary to sustain a state of combat readiness.

This ICRMP is structured around the assumption that the CRMP staff will consist of one full time Cultural Resource Manager (CRM) augmented by contract personnel on a project by project basis. The CRM must be a government employee who is responsible for overall operations and activities of the CRMP to include developing budget plans, compliance project over site, commander briefings, and strategic planning meetings. The CRM at a minimum will have training in historic preservation compliance law and procedures. The contract personnel are qualified professionals that meet the Secretary of Interiors Professional Qualification Standards (36 CFR 61: 48 FR 44738-9) in disciplines appropriate to the installation's historic properties, and serve as technical support in survey, identification and evaluation of historic properties. In accordance with Fort Gordon's Section 106 PA with the Georgia SHPO, Stipulation 1(A) states that Fort Gordon will employ, maintain a contract with, or, obtain through other means, qualified professionals that meet the Secretary of Interior's Professional Qualifications Standards. Currently contract personnel fulfill the professional requirements.

1.4.2 CRMP Goals

- To establish specific procedures for compliance with all Federal laws and regulations governing the protection and preservation of historic resources with least degradation of the primary military mission and ongoing training activities.
- To minimize adverse effects upon all historic properties (i.e., both above-ground resources and archaeological sites) located on Fort Gordon that meet the criteria for listing on the NRHP.
- To locate and evaluate the significance of archaeological sites on Fort Gordon and to identify all those that meet the criteria for inclusion on the NRHP.
- To give priority to the evaluation of sites in areas that are heavily used for training maneuvers, both to identify and devise protective strategies for NRHP eligible sites located in areas of high maneuver impact and to reduce the number of non-evaluated or potentially eligible sites that must be avoided by training activities.
- To enforce Federal laws that prohibit willful vandalism and casual collection of antiquities from sites located on Fort Gordon through a program of selective site surveillance and a parallel program promoting public awareness.
- To coordinate and interact with Native Americans regarding cultural resources, including traditional cultural properties.
- To include public outreach and involvement in cultural resources projects.
- To continue meeting the curation standards set forth in 36 CFR § 79.

1.4.3 CRMP Integration

The over-arching objective of the CRMP is integrating with internal and external stakeholders to protect and manage cultural resources in support to the military mission. Timely integration allows for consideration of impacts to cultural resources within the planning stages of projects and helps balance compliance of cultural resource integration with concerns of all stakeholders. The lack of integration of the CRMP with its stakeholders can lead to delays in projects and military training activities, litigation by external stakeholders, and loss or damage of irreplaceable cultural resources.

This ICRMP lays out procedures for integration with both internal and external stakeholders. SOP#1 Integrate the CRMP, lays out the responsibilities of the various offices on Fort Gordon that have a major role in cultural resource compliance. A procedure to involve the general public and consult with the Tribes is included in Section 6.0 Public Involvement Plan. The Section 106 procedure, laid out in SOP#2, combines both internal and external stakeholders in the process of cultural resource compliance.

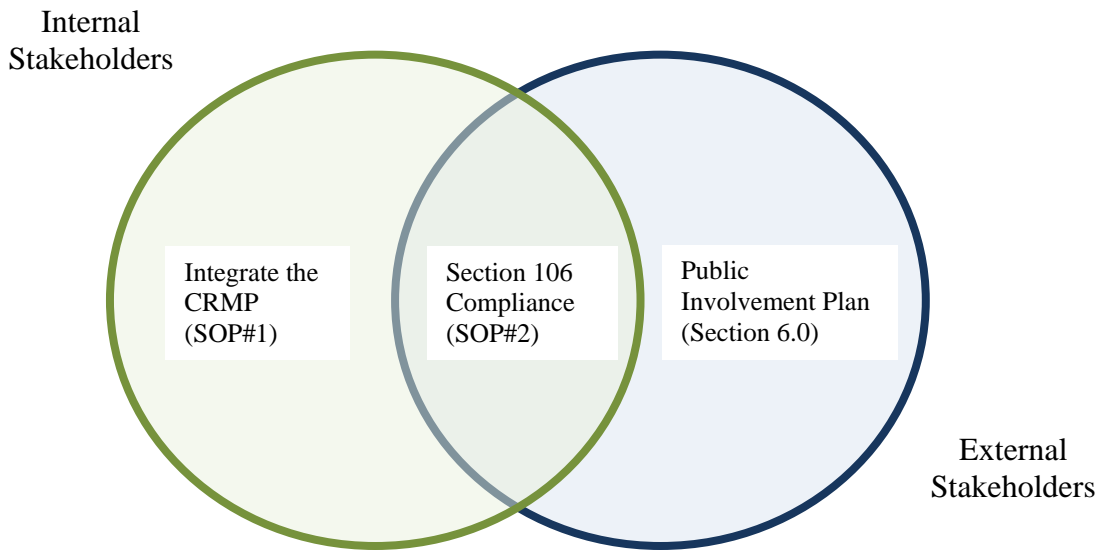


Figure 3: CRMP Integration Procedures

2.0 REGULATIONS AND STATUTES

This section contains brief summaries of the scope and intent of cultural resource laws and regulations that pertain to Fort Gordon. Primary discussions apply to Federal Statutes, Regulations, EOs, Presidential Memoranda, and Department of Defense Directives. State and local cultural resources laws and regulations do not apply to Army property because there has been no waiver of sovereign immunity in this area.

2.1 FEDERAL STATUTES AND REGULATIONS

2.1.1 Antiquities Act

The Antiquities Act of 1906 (16 USC 431-433; 32 Stat. 225) allows the President of the United States to set aside federally owned lands as historic landmarks. It also allows for the federal government to acquire private land for historic preservation. The Act requires that excavation of archaeological sites on federal land be conducted by qualified individuals under federally issued permits, and requires that artifacts and objects be preserved permanently in museums.

The Act establishes penalties for any person who excavates, injures, or destroys any historic property or monument on federal land without permission from the appropriate federal department. The procedures for issuing permits, and instructions for seizure of illegally acquired archaeological objects are provided in implementing regulation 43 Code of Federal Regulations (CFR) Part 3 (43 CFR 3).

2.1.2 Historic Sites Act

The Historic Sites Act of 1935 (16 USC 461-467) establishes as national policy the preservation of historic resources for public use by giving the Secretary of the Interior the power to conduct historic surveys and to document, evaluate, acquire, and preserve archaeological and historic properties. This act led to the creation of the Historic Sites Survey, the Historic American Buildings Survey (HABS), and the Historic American Engineering Record (HAER) within the National Park Service (NPS). The Historic Landmarks Program is implemented under this act by 36 CFR 65.

2.1.3 National Historic Preservation Act

The National Historic Preservation Act (NHPA) of 1966, as amended (16 USC 470-470w), is the cornerstone of federal preservation law and is the most important piece of legislation for the care

of cultural resources at Fort Gordon. The Act sets forth a general policy of preserving historic properties by the federal government for the benefit and education of the people of the United States. The Act directs the Secretary of the Interior (Secretary) in creating and maintaining the National Register of Historic Places (NRHP), which is a national listing of districts, buildings, sites, structures, and objects considered to be of local, state, or national significant for their contributions to American history, architecture, archaeology, engineering, and/or culture. The Secretary is directed to establish criteria for nominating properties to the NRHP and making determinations of NRHP eligibility.

The NHPA establishes a State Historic Preservation Officer (SHPO) responsible for the identification of historic properties within each state. The SHPO also ensures that NRHP-eligible and listed properties are taken into account during planning and development. The Act further establishes the Advisory Council on Historic Preservation (ACHP) as an independent federal agency that advises the President and Congress on concerns of historic preservation. The key provisions of the Act are provided in Sections 106 and 110 of NHPA.

Section 106 of NHPA forms the basis for most of the work conducted under an installation ICRMP. Federal agencies are required to take into account the effect of their undertakings on properties listed or eligible for inclusion to the NRHP, and the ACHP may choose to comment on installation activities that have the potential to affect historic properties (i.e., properties that are listed in, or eligible for listing in, the NRHP). Federal agencies must take into account the effects of undertakings during the planning stage and must provide protective or mitigative measures for historic resources that may be affected by its activities. This process is detailed in implementing regulations 36 CFR 60, 36 CFR 63, 36 CFR 79, and 36 CFR 800. Section 106 requires that reasonable efforts be made to minimize harm to NRHP-eligible and -listed properties until the Section 106 consultation process is complete.

The NHPA was most recently revised in 2001 under Part II, Advisory Council on Historic Preservation 36 CFR 800: Protection of Historic Properties. One of the most significant changes was an expanded role for Native American tribes and Hawaiian organizations in the Section 106 process. In addition, the ACHP removed itself from reviewing determinations of no adverse effect and routine Memoranda of Agreement (MOA), placing the primary role of regulating Section 106 with the agency and the SHPO.

Section 110 of NHPA outlines affirmative responsibilities with respect to historic properties. Federal agencies are required to assume responsibility for the preservation of historic properties owned or controlled by the respective agency. Federal agencies are required to locate, inventory, and recommend as eligible all properties that appear to qualify for inclusion on the NRHP. Costs of preservation may be included in the planning efforts of agency undertakings. Waiver of Federal Agency Responsibility is implemented at 36 CFR 78.

Section 110 expands the role of tribal historic preservation programs. Under this section, the Secretary is authorized to coordinate preservation efforts with Federally-recognized Indian tribes and native Hawaiian organizations, SHPOs, and federal agencies. NRHP significance criteria include “properties of traditional religious and cultural importance to an Indian tribe or native Hawaiian organization.” This is important because it affords legal protection to traditional

cultural properties (TCPs) under the American Indian Religious Freedom Act of 1978 (AIRFA). TCPs were previously recognized as important, but were not afforded legal protection. Amendments to Section 110 obligate federal agencies to withhold federal assistance from nonfederal applicants when historic properties have been intentionally damaged prior to the completion of the Section 106 process.

Section 111 of the Act requires that federal agencies implement alternatives, including adaptive reuse, for historic properties that are not needed for current or projected agency purposes. Agencies may also lease or exchange historic properties if the lease or exchange is compatible with preservation.

Section 112 requires that all research, preservation, and protection activities be done by persons meeting professional standards developed by the Secretary of the Interior, including both agency and contractor personnel.

Section 113 calls for a study to help control illegal interstate and international traffic in antiquities.

Section 304 allows the head of a federal agency to withhold from disclosure information concerning the location or character of historic resources.

Sections 401–407 establish the National Center for Preservation Technology and Training as a part of the NPS. The Center is charged with development and distribution of preservation and conservation technologies for historic resources.

2.1.4 Archaeological Resources Protection Act

The Archaeological Resources Protection Act (ARPA) of 1979, as amended (16 USC 470aa-47011) establishes that archaeological resources on public lands are part of the heritage of the nation and should be preserved for the benefit of the American people. Unauthorized excavation, removal, damage, or alteration of any archaeological resource on public lands is prohibited, and the law provides criminal and civil penalties for violation. Qualified individuals who want to excavate or remove archaeological resources from federally owned land might obtain permits from the appropriate federal agency. The proposed work must be undertaken strictly for the purpose of furthering archaeological knowledge. All archaeological artifacts and resources are to remain the property of the United States. Regulations for the curation of federally owned and administered archaeological collections are provided in 36 CFR 79.

Federal agencies may not disclose any information pertaining to the location of archaeological sites unless the disclosure would not create a risk to the condition of archaeological resources. Federal agencies must develop plans for surveying lands not scheduled for specific undertakings, must record and report archaeological violations, and must develop public awareness programs.

ARPA implementing regulations for the DoD (32 CFR 229) specify that protected resources must be at least 100 years old. The implementing regulations also outline the process for

granting excavation permits. Supplemental regulations are provided in 43 CFR 7.2.

2.1.5 Native American Graves Protection and Repatriation Act

The purpose and intent of the Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 as amended (25 USC 3001-3013) is to acknowledge the ownership of certain human remains, funerary objects, and sacred artifacts by Federally-recognized Native American tribes. In addition, the Act requires the objects to be treated in a way that is agreeable to these tribes. NAGPRA implementing regulations are found in 43 CFR 10.

NAGPRA provides for the repatriation of Native American remains upon the request of culturally affiliated tribes. The act requires federal agencies and museums to inventory human remains, associated and unassociated funerary objects, sacred object, and objects of cultural patrimony and to provide culturally affiliated tribes with the inventory. Upon request, the remains or objects are repatriated to the culturally affiliated tribes.

If the agency discovers remains or objects discovered on federal lands, the agency must notify Federally recognized Native American tribal leaders of the discovery and provide them with an opportunity to claim affiliation with the remains or objects. For remains or objects already in the possession of federal institutions or agencies, the agency must inventory the remains or objects and provide the inventory to Federally recognized Native American tribal leaders. For human remains and/or cultural objects to fall under the provisions of NAGPRA, they must first be identified as “Native American” [25 U.S.C. §3001 (9)]. Additionally, and the tribe with which the remains (or objects) are affiliated has to be identified, based on present day or historic presence in the region in which the remains (or objects) were discovered. The Tribe determined to have right-of-ownership may then consult with the agency to determine disposition of the remains or objects, and the agency is responsible for complying with these determinations. An April 29, 1994 Presidential Memorandum stipulates that consultation with Federally recognized Native American tribes must be conducted on the basis of government-to-government relations.

NAGPRA also establishes a grant program with the Department of Interior to assist Federally recognized tribes and Native Hawaiian organizations in repatriation and to assist museums in preparing inventories and collections summaries. The act makes the sale or purchase of Native American human remains illegal, whether or not they derive from federal land. Implications for Fort Gordon relate to any activities in which cultural items may be recovered.

2.1.6 American Indian Religious Freedom Act

The American Indian Religious Freedom Act (AIRFA) of 1978, as amended (42 USC 1996-1996a) seeks to protect and preserve traditional Native American, Eskimo, Aleut, and Hawaiian spiritual beliefs and practices by providing Native American and Hawaiian access to sacred sites. Although AIRFA does not direct federal agencies to consult with Native American groups, compliance can only logically be met through some type of consultation with culturally affiliated leaders. This interaction should lead to a cooperative effort to develop and implement policies

and procedures that will aid in determining how to protect and preserve cultural and spiritual traditions. To date, there are no implementing regulations. Section 10(a) of ARPA requires that uniform regulations be promulgated for ARPA after consideration of AIRFA.

2.1.7 Religious Freedom Restoration Act

The Religious Freedom Restoration Act of 1993 (Public Law [PL] 103-141) specifies that the government shall not substantially burden an individual's exercise of religion unless the government can justify the application of the burden. A person's exercise of religion includes access to religious sites on government-managed land.

2.1.8 Archaeological and Historic Preservation Act

The Archaeological and Historic Preservation Act (AHPA) of 1974 as amended (16 USC 469-469c), provides for the preservation of archaeological and historical sites and data, regardless of NRHP eligibility, that might be lost due to federal construction or other federally licensed or assisted activities. If significant archaeological data will be lost, the Secretary of the Interior may direct that funds be allocated for the recovery and preservation of archaeological data if the federal agency requests that the NPS undertake data recovery. This act was never officially named, and sometimes also is referred to as the Moss-Bennett Act or the Archaeological Data Preservation Act.

2.1.9 Public Buildings Cooperative Use Act

Under the Public Buildings Cooperative Use Act of 1976 as amended (40 USC 601a), the Administrator of General Services must, among other duties, acquire and use space in suitable buildings of historic, architectural, or cultural significance, unless use of such space would not prove feasible and prudent compared with available alternatives. The intent of this act is to help preserve these buildings through their continued use.

2.2 EXECUTIVE ORDERS

2.2.1 Executive Order 13007

Executive Order 13007, signed by President Clinton on May 24, 1996, established the responsibility of federal agencies to accommodate access to sacred Native American sites located on federal land for ceremonial use by Native American religious practitioners. Federal agencies that manage lands must accommodate access to and ceremonial use of Native American sacred sites, must avoid adversely affecting the physical integrity of such sites, and must maintain

confidentiality of the location of these sites where such actions are not inconsistent with law or essential agency functions. This order, together with AIRFA and the Religious Freedom Restoration Act, works to protect sacred sites and access to these sites by traditional Native American users. Sacred sites, as covered by this EO, need not be historic or otherwise protected property.

EO 13307 also directed agencies to (1) implement procedures to carry out the provisions of the order, including provisions to notify Native American tribes of actions that might affect sacred sites, access to, and use of such sites and (2) report to the President (by May 24, 1997) changes in laws, regulations, or procedures to accommodate access and use of sites and to avoid adverse effects on the sites, and to facilitate consultation with tribes and religious leaders, including provisions for dispute resolution.

2.2.2 Executive Order 13175

Executive Order 13175, signed by President Clinton on November 6, 2000, establishes consultation and coordination with Indian tribal governments. The United States has a unique legal relationship with Indian tribal governments and as such recognizes the right of Indian tribes to self-government and supports tribal sovereignty and self-determination. As a result, the Army is accountable for ensuring that consultation with Federally-recognized tribes is provided whenever an undertaking has the potential to significantly impact resources that may be of tribal interest.

2.2.3 Executive Order 13287

Executive Order 13287, signed by President Bush on March 3, 2003, complements the Preserve America initiative. Preserve America promotes the protection, enhanced stewardship, and heritage tourism of historic properties owned by the Federal Government. It also encourages the establishment of partnerships with State and local governments, Indian tribes, and the private sector to add to local economic development and the productive use of historic properties.

2.3 PRESIDENTIAL MEMORANDA AND DEPARTMENT OF DEFENSE DIRECTIVES

2.3.1 Government-to-Government Relations with Federally-Recognized Native American Tribes

In 1994, the White House issued a Presidential Memorandum for the Heads of Executive Departments and Agencies that reiterates the federal government's relationship with Native American tribes as government-to-government. This means that the Army must consult with

appropriate heads of Federally-recognized tribal governments before taking actions that could impact cultural resources of importance to a tribe.

2.3.2 Department of Defense American Indian and Alaska Native Policy (Annotated Policy)

The 1999 Department of Defense (DoD) Annotated Policy Document for the DoD American Indian and Alaska Native Policy governs the U.S. Army's interactions with Federally recognized tribes. This policy supports tribal self-governance and government-to-government relations between the federal government and tribes. The policy does not enlarge or diminish the Army's legal obligations with respect to Federally recognized tribes, nor does it provide an independent cause of action upon which the Army may be sued. Although the policy does not obligate consultation with tribes in advance of projects that may "potentially" affect tribal interests, general consultation is recommended as a matter of discretion. The Army must consult with tribes only when proposed actions have the potential to significantly affect tribal concerns, such as: protected tribal resources (e.g., natural resources and properties of traditional or customary religious or cultural importance); tribal rights (e.g., rights legally accruing to a tribe or tribes by virtue of inherent sovereign authority, unextinguished aboriginal title, treaty, statute, judicial decisions, executive order or agreement, and that give rise to legally enforceable remedies); or any lands to which title is either: 1) held in trust by the United States for the benefit of any Indian tribe or individual; or 2) held by any Indian tribe or individual subject to restrictions by the United States against alienation.

2.3.3 Department of Defense Directive 4710.1

DoD Directive 4710.1, dated June 21, 1984, states that it is the policy of the DoD to integrate archaeological and historic preservation requirements of various laws with the planning and management of DoD activities. The Directive assigns specific responsibilities to the heads of military departments, including the U.S. Army, to implement an archaeological and historic preservation program. It briefly lists management responsibilities that mirror the federal laws for archaeological and historic resources. The Directive reinforces the responsibility of the DoD to comply with these laws and regulations.

2.3.4 Department of Defense Instruction 4715.16

Dated September 18, 2008, this DoDI establishes DoD policy and responsibilities to comply with applicable Federal statutory and regulatory requirements, Executive Orders, and Presidential memorandums for the integrated management of cultural resources on DoD-managed lands.

2.4 ARMY REGULATIONS/PUBLICATIONS

2.4.3 Army Regulation 200-1 Environmental Protection and Enhancement

As of December 2007, AR200-4 was incorporated into AR 200-1. This regulation implements Federal, State, and local environmental laws and DOD policies for conserving, protecting, preserving, and restoring the quality of the environment. AR 200-1 should be used in combination with NEPA (32 CFR Part 651).

2.5 OVERLAPPING AUTHORITIES

From the above discussion, it is clear that in several cases, different laws pertain to the same issue. For example, AIRFA and EO 13007 both deal with different aspects of Native American sacred places that may be under federal control. As noted above, compliance with one law in no way abrogates the responsibility of an agency to comply with all aspects of other applicable legislation.

Of greater importance to the practical management of cultural resources at Fort Gordon is the relationship between the NHPA and NEPA. Compliance with NEPA does not constitute compliance with NHPA. Both NEPA and the NHPA are triggered when a proposed federal action/undertaking has the potential to affect cultural resources. Under the NHPA, an undertaking has “no adverse effect” on a given historic property when it does not diminish those characteristics that qualify the property for inclusion in the NRHP. Under NEPA, a proposed action has “no significant impact” when it is not expected to affect the cultural and natural environment to any significant degree. NEPA applies to “major” actions that have the potential for significant impacts on the environment (and which are not categorically excluded), whereas any undertaking that has the potential to affect NRHP-eligible cultural resources can trigger NHPA. For example, changing the original window frames on an historic building to modern metal frames would not be a “significant impact” under NEPA because it is extremely limited in degree, rather than a major action. However, this same undertaking could be an “adverse effect” under NHPA because it would diminish the integrity of the building.

2.6 PENALTIES FOR NONCOMPLIANCE

Failure to satisfactorily comply with Section 106 responsibilities can result in potential lawsuits for a federal agency. Should sites be destroyed as a result of agency undertakings without completion of the Section 106 process, the agency is required to inform the SHPO and the ACHP in writing regarding what happened and why. Technically, the ACHP can sue a federal agency for noncompliance although this does not normally happen. More likely are lawsuits brought about by interested parties involved in the Section 106 process, which could include but are not

limited to the SHPO, the State, Native American tribes, or any individual or group of individuals concerned with the proper management of cultural resources. The ACHP may send a letter of foreclosure to the Secretary of the Army if noncompliance does occur.

Cultural resources are protected by civil and criminal penalties on individuals or organizations that plunder, loot, or otherwise deface or damage archaeological sites. The Antiquities Act of 1906 was the first piece of federal legislation designed to protect cultural resources on federal land. ARPA greatly strengthened criminal penalties for damaging or destroying cultural resources on federal and Native American lands.

The Antiquities Act consists of four short paragraphs of legislation passed into law as 16 USC 431–433 on June 8, 1906. For over 70 years, the Antiquities Act served as the only legal protection for archaeological sites against damage and destruction perpetrated by looters. Most current federal regulations dealing with the protection of archaeological resources are based upon the Antiquities Act. The Antiquities Act has three primary purposes:

- To establish criminal sanctions for the destruction of antiquities
- To establish national monuments
- To establish permitting procedures for the scientific investigation of archaeological sites

Under the Antiquities Act, site excavation and the removal of archaeological objects are illegal on federal and Native American lands without a permit issued by the Secretary of the Interior, Secretary of Agriculture, or Secretary of War. The act authorizes the President of the United States to designate national monuments to protect historic landmarks, historic and prehistoric structures, and other objects of historic and scientific interest. Violators “who shall appropriate, excavate, injure, or destroy any historic or prehistoric ruin or monument, or any object of antiquity situated on lands owned or controlled” by the federal government are liable to criminal misdemeanor charges with fines up to \$500 and/or 90 days imprisonment or both. Since 1987, the Criminal Fines Improvement Act classifies the Antiquities Act as a Class B misdemeanor with fines of up to \$5,000 for an individual (\$10,000 for an organization) and six months imprisonment or both.

The Antiquities Act suffers from a lack of detail and definition that inhibits its usefulness in criminal prosecution. The Act was ruled “unconstitutionally vague” as to the age of an “object of antiquity” by the Ninth US Circuit Court of Appeals in 1974. As a result, ARPA was amended in 1988 to facilitate and simplify prosecution, as well as to regulate access to archaeological resources on federal or Native American tribal lands. The resulting uniform regulations expanded the definitions of protected items and established methods for determining archaeological value. Like the Antiquities Act, ARPA provides for a permitting process for the lawful excavation of archaeological sites. Unlike the Antiquities Act, ARPA provides uniform guidance for the issuance of such permits requiring that the applicant be qualified, that research designs and mitigation plans are credible, that a specified level of work be accomplished within a specified period of time, and that the resources removed remain under ownership of the United States.

ARPA uniform regulations stipulate that Federally-recognized Indian tribes having a religious or

cultural interest in an archaeological site on public land be notified 30 days before an excavation permit is issued. It is the prerogative of tribal officials to comment upon the issuance of the permit, and the land manager may stipulate mitigation measures in permit requirements.

Perhaps more salient to protection of resources within Fort Gordon's boundaries are the criminal provisions of ARPA. Both felony and misdemeanor sanctions may be applied to persons who violate ARPA prohibited activities. Under ARPA:

- No person may excavate, remove, damage, or otherwise alter or deface or attempt to excavate, remove, damage, or otherwise alter or deface any archaeological resource located from Fort Gordon (or any other public or Indian lands) without a permit.
- No person may sell, purchase, exchange, transport, receive, or offer to sell, purchase, or exchange any archaeological resource in violation of ARPA or any other federal law.
- No person may sell, purchase, exchange, transport, receive, or offer to sell, purchase, or exchange, in interstate or foreign commerce, any archaeological resource excavated, removed, sold, purchased, exchanged, transported, or received in violation of any provision, rule, regulation, ordinance, or permit in effect under state or local law.
- Any person who knowingly violates, or counsels, procures, solicits, or employs any other person to violate, any prohibition contained in subsection (a), (b), or (c), shall be held accountable under the law.

ARPA violations can be prosecuted through a civil process. Civil proceedings are pursued in administrative law courts initiated by the appropriate federal land manager. Civil proceedings are analogous to damage assessments performed by federal agencies in that damage assessments are billed to the perpetrator. The advantage of civil prosecution under ARPA is that the government's burden of proof in a civil case is considerably less than in a criminal case, thus increasing the likelihood of conviction.

Several conditions must be met in the successful prosecution of an ARPA case; these include jurisdiction in federal court, the identification of the site or item as an archaeological resource, the absence of a permit to cover the activity, documentation of the prohibited act, and assessment of the amount of damage actually inflicted. Incidents taking place on Fort Gordon would fall within the jurisdiction of the federal court because of its status as federal land, so this condition will always be met. Artifacts or sites must demonstrably be the material remains of past human life that are of archaeological interest and are more than 100 years of age. Examples of ARPA protected resources include basketry, pottery, bottles, weapons, projectiles, tools, structures, pit houses, rock art, graves, human skeletal materials, organic waste, by-products from manufacture, rock shelters, apparel, and shipwrecks. ARPA specifically exempts paleontological specimens and arrowheads found in surface contexts from criminal prosecution. Arrowheads from subsurface contexts are protected, however.

Damage assessments involve the calculation of the commercial value of items taken from a site or alternatively, a calculation of archaeological value. Commercial value is determined on the basis of appraisal of fair market value of recovered items. Archaeological value is appraised in terms of data recovery costs sufficient to retrieve information that would have been obtainable prior to the violation. Data recovery costs include the costs of preparing a research design,

conducting fieldwork, carrying out laboratory analysis, and preparing reports that would be necessary to realize the information potential from that particular site. Additional costs include those associated with stabilization and repair of damaged site areas. The National Park Service's [Technical Brief 20](#) provides more explanation and description on the process of doing a damage assessment on archaeological resources.

Criminal penalties under ARPA depend upon the amount of damage inflicted. In cases where less than \$500 of damage to an archaeological site occurs, the offense is a misdemeanor punishable by fines of up to \$100,000 and/or incarceration for up to one year for individuals and fines of up to \$200,000 for organizations. When damage inflicted exceeds \$500, the offense is a felony punishable by fines of up to \$250,000 for individuals and \$500,000 for institutions and/or incarceration for up to two years. Repeat offenders can be incarcerated for up to five years. Vehicles and equipment involved in an ARPA violation are subject to confiscation. Civil penalties under ARPA are generally determined by calculating the amount of damage and adding to it the cost of items removed from a site. The land manager can increase these amounts for repeat offenders.

The Antiquities Act and ARPA are administered by the agencies responsible for the stewardship of federal property. In most instances, these two acts are used to prosecute individuals or groups who damage, deface, or destroy archaeological sites. In theory, however, these same acts imply an agency responsibility to properly manage and protect archaeological properties. Abrogation of those responsibilities could result in lawsuits brought against federal agencies whose responsibility it is to enforce them.

2.7 RESOURCE MANAGEMENT

Under the NHPA, every federal action (undertaking) with the potential to affect historic properties must be reviewed through the Section 106 consultation process. In this process, the Army must consult with the ACHP and with the SHPO to determine if the undertaking will adversely affect any historic properties. The Army will also determine the scope of the project, its potential effects, and determine what level of public involvement is required.

To provide federal agencies with additional flexibility, the implementing regulations (36 CFR 800) provide several alternative methods of consultation. The most common alternative to case-by-case review is a Programmatic Agreement (PA), which is developed between the Army/DA, the ACHP, and the GA-SHPO. A PA is a special type of MOA typically developed for a large or complex project or for a class of undertaking that would otherwise require numerous individual requests for ACHP comments under Section 106. The ACHP and DA arrange for public notice of the consultation and must request the views of state and local government, Indian tribes, industries, and organizations. Upon reaching agreement, the PA is published in the Federal Register. It remains in force until it expires or is terminated.

Among other situations, PAs are appropriate when the effects on historic properties are similar and repetitive, or when undertakings involve routine management activities at federal

installations. Normal mission related undertakings such as training and testing are especially indicated, as are regular and/or recurrent non-mission related undertakings such as mining, agricultural, or forestry leases.

Since 2006, Fort Gordon has been managing impacts to cultural resources under a PA with the GA SHPO. This five year document allows Fort Gordon staff to conduct most of its Section 106 compliance in-house. As previously every determination of project impacts to cultural resources was submitted to the GA SHPO for a 30 day review, the PA considerably cuts back on the amount of time needed for day to day project review.

3.0 PLANNING LEVEL SURVEY

This section provides an overview of the range and types of cultural resources known to be present at Fort Gordon. A cultural resource can be a district (e.g. group of related buildings, sites, or structures), site, building, structure (e.g. bridge), object (e.g. historic cannon) or traditional cultural property that is eligible for listing or listed on the National Register of Historic Places (NRHP). Fort Gordon contains cultural resources representing Native American through the mid-20th century Military occupation of the area. The completed levels of survey to identify and evaluate the eligibility of cultural resources on Fort Gordon are presented in this section.

3.1 SUMMARY OF PREVIOUS CULTURAL RESOURCES STUDIES

3.1.1 Archaeology

Fort Gordon has completed the archaeological survey of the majority of its property, with the exception of portions of the disturbed cantonment area, impact areas that contain or are likely to contain unexploded ordnance, and lake bottoms (Figure 4). There are two areas that require Phase I survey. These two areas, left out of previous Phase I coverage of the installation, are a total of 119 acres and are located in training areas 23 and 1 (Figures 5 and 6).. As of 2009, 1150 archaeological sites have been identified on Fort Gordon. Of these, 995 are classified as not eligible for listing on the NRHP; 114 are potentially eligible, and 41 sites are considered eligible for the NRHP. Phase II testing to evaluate the NRHP eligibility of archaeological sites has been completed at 33 sites. Data recovery took place at the Boardman Mill and the Leitner Mill sites. Appendix B provides a list of sites designated as eligible or potentially eligible

While no further inventory is planned, previous inventory and evaluation efforts for historic sites are currently not sufficient. Phase I inventories from the early 1990s determined that some historic sites have good integrity however they were considered to have “questionable archaeological value” based on a lack of research interest in historic sites at the time of the survey. This discrepancy occurs very seldom as the majority of historic sites have been destroyed through bulldozing, timber harvesting and military activities. Also historic sites that were missed during the Phase I surveys are continually located as a training area is being marked for commercial timber harvesting. As these sites are found during timber marking, they can be determined as an inadvertent discovery and protected from adverse affects of the harvesting undertaking until they can be documented and evaluated. Those historic sites that have been previously unidentified will be dealt with IAW the procedure laid out in the PA and SOP#4. Those historic sites that will need to be resurveyed based on the CR staff’s review of previous survey information as well as an on-site pedestrian inspection will be dealt with on an as needed

bases according to SOP#2.

Table 1: Archaeological Studies Conducted on Fort Gordon

Year	Reference	Description
1942	MacCord 1942	Site Testing on 9RI377
1973	Augusta Archaeological Society 1973	Survey Fort Gordon Golf Course
1976	Lewis 1976	Survey South Prong Borrow Pit
1979–1980	Campbell et al. 1981	Survey 98 acres
1985	Gresham 1986	Highway Survey
1989–1990	Braley and Price 1991	Survey 7,330 acres timber harvest
1990	Kodack 1991a	Survey 9 acres
1990	Braley 1993	Survey 3,500 acres timber harvest
1990	Braley 1990	Survey 15 acres
1990–1991	Kodack 1991b	Survey 4 culverts
1991	Braley 1991	Testing 9RI377; survey Wilkerson Lake
1991	Poplin 1991	Survey Boardman Dam Haul Road
1991	Braley and Froeschauer 1991	Survey Boardman Pond, data recovery 9RI430
1991	Paglione 1991	Survey Belair Road
1991	Wood 1991	Survey 5 acres
1991	Crampton 1991a	Survey 4 acres
1991	Crampton 1991b	Survey .5 acres
1991	Crampton 1991c	Survey 4 acres
1991	Willard 1991	Survey clinic/storage facilities
1991–1992	King and Braley 1992	Survey 3,500 acres training areas
1992	Reed et al. 1994	Survey, data recovery Leitner mill pond
1992	Braley 1992	Survey 1,515 acres agricultural lease areas
1992–1993	Braley and Benson 1994	Survey 27,784 acres timber harvest areas
1994	Braley 1994a	Survey of 3,854 acres timber harvest areas
1994	Braley 1994b	Survey of 1,696 acres agricultural lease and Butler dam
1995–1996	Grover 1996	Survey 682 acres cantonment area
1997	Grover et al. 1997	Testing of 10 sites
1998	Little et al. 2001	Testing 11 sites
2000	Banguilan et al. 2001	Testing 6 sites
2008	Valk and Lockerman 2008	Survey of 22 sites and Testing of 9RI116
2008	Soderstrom et al 2008	Survey of Transmission Line Corridor
2009	Gantt et al 2009	Testing of 9RI608

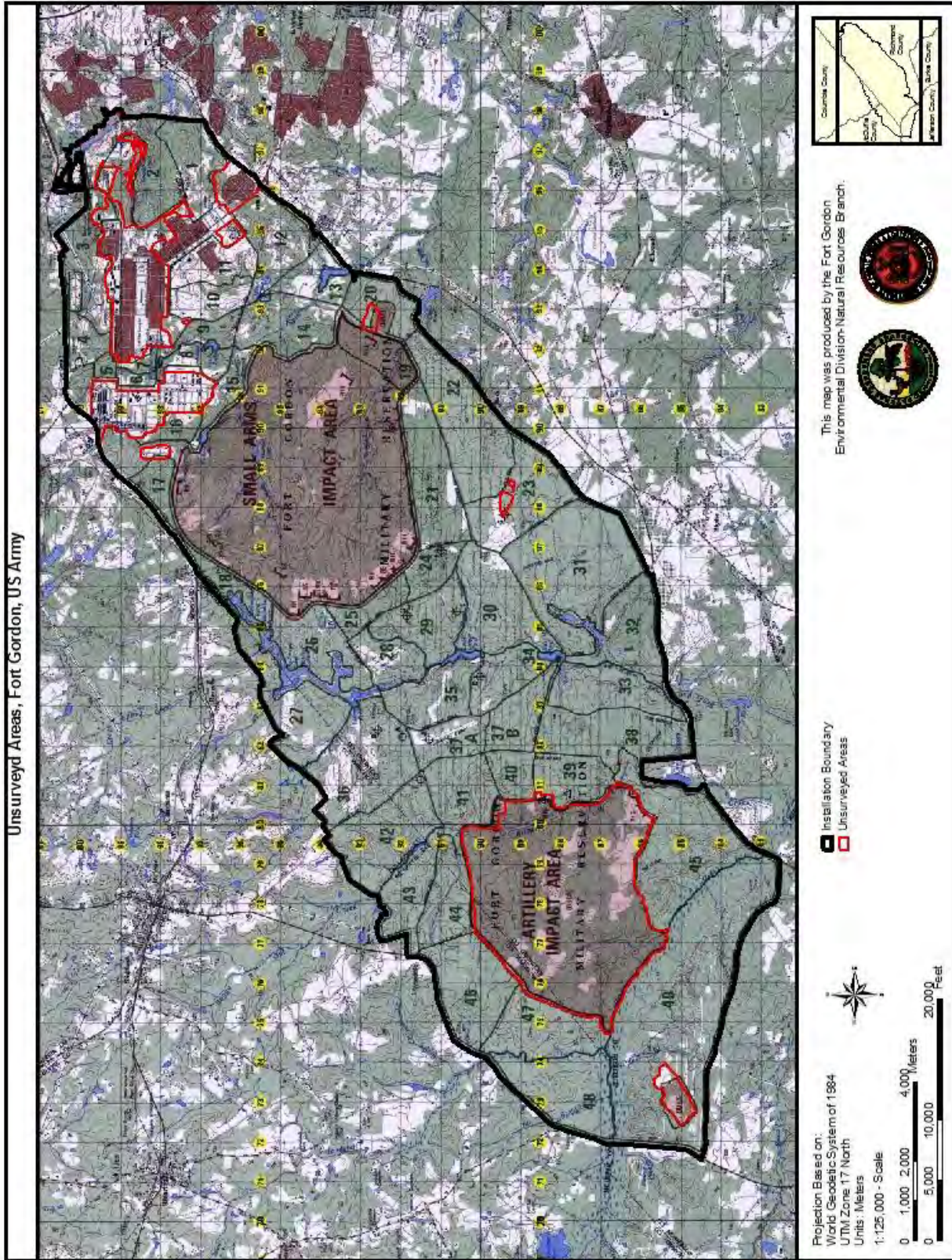
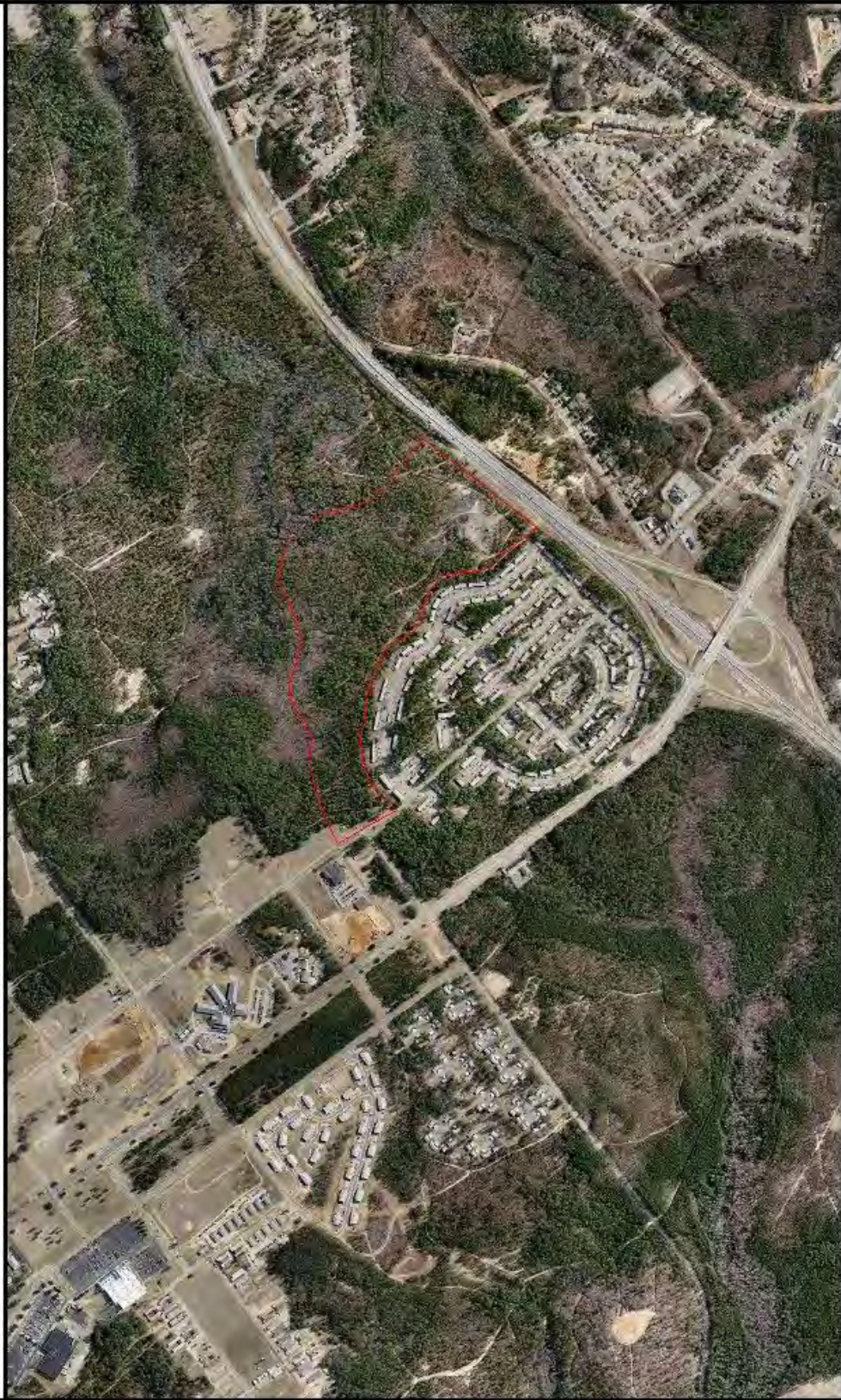


Figure 4: Unsurveyed Areas on Fort Gordon



Figure 5: Training Area 23 Unserved Area

Training Area 1 Unsurveyed Area, Fort Gordon, US Army



Installation Boundary
□ Unsurveyed_Area

Projection Based on:
World Geodetic System of 1984
UTM Zone 17 North
Units : Meters
1:14,841

0 125 250 500 Meters
0 600 1,200 2,400 Feet

This map was produced by the Fort Gordon
Environmental Division-Natural Resources Branch.

Figure 6: Training Area 1 Unsurveyed Area

3.1.2 Architectural Studies

Fort Gordon has completed historic architectural surveys for all buildings built through 1989. The 1995 Historic Preservation plan included the HABS/HAER documentation of eight WWII temporary (700 and 800 series) building types on the installation. In 1999, John Cullinane Associates conducted a historic structures inventory of World War II mobilization buildings within the “warehouse area” of Fort Gordon. The inventory was conducted as part of a programmatic agreement prior to demolition. A total of 67 structures were examined; however, none of the structures were unique, contained sufficient integrity, or historic or architectural integrity to be exempt from demolition (John Cullinane Associates 1999). In 2005, staff from CERL completed building surveys examining six quarters and associated buildings surrounding Boardman Lake, buildings constructed from 1942 to 1956, and Cold War buildings from 1957 to 1989.

According to the 2005 Cold War Building Survey 42 buildings will need to be reevaluated when they reach 50 years old. The Signal School area is included in this list and will need to be evaluated as a potential historic district. Also, based on the recommendation of the GA SHPO, Building 33500, Woodworth Library is considered eligible for the National Register under Criteria C for the architectural significance of its New Formalism style and Criterion Consideration G for a building less than 50 years old as few buildings of this style remain intact in Georgia.

Table 2: Architectural Studies Conducted on Fort Gordon

Year	Reference	Description
1995	Joseph et al 1995	HABS/HAER of Eight WWII temp building types
1999	Cullinane 1999	Inventory of 67 WWII buildings in warehouse area
2004	Smith and Stone 2004	Survey of buildings around Boardman’s Lake
2005	Smith and Stone 2005	Survey of buildings built between 1942-56
2005	Smith and Stone 2005	Survey of Cold War era buildings (1957-89)

There are several nationwide agreements that the Department of Defense (DoD) and Department of Army (DA) have entered into with the National Council of State Historic Preservation Officers or the Advisory Council of Historic Preservation. A list of these agreements is in Table 3 and the documents are included in Appendix E. The applicability of these documents to buildings on Fort Gordon are reviewed IAW the PA and SOP#2. A list of the individual buildings on Fort Gordon that are covered under these nationwide agreements is included in Appendix B.

Table 3: DoD and DA Nationwide Agreements

Year	Title	Description
1986	WWII Temp PA	Demolition of 700 and 800 series WWII Temp buildings
2002	Capehart-Wherry Family Housing Program Comment (PC)	Covers various management actions for Army family housing built between 1949-62

2006	Unaccompanied Personnel Housing (UPH) PC	Covers various management actions for UPH constructed between 1946-74
2006	Ammunition Storage PC	Covers various management actions for ammunition storage facilities built between 1939-74

3.2 PREHISTORIC CULTURAL CONTEXT

This section provides an overview of the culture history for the Fort Gordon area. The prehistory of Georgia begins sometime prior to 9000 B.C. with the first human settlement in the state and ends with the de Soto entrada of A.D. 1540. The summary below draws on information from Fort Gordon, Richmond County, and the surrounding region to define the broad patterns of prehistory and characterize the human populations that inhabited the area over those millennia. Table 4 provides an overview of the prehistoric occupation of the Fort Gordon region.

3.2.1 Paleoindian Period (ca. 12,000–8000 B.C.)

The Paleoindian period marks the beginning of human occupation in the New World. Exactly when the first human populations permanently settled the western hemisphere is uncertain; most Americanist archaeologists believe it was sometime between 20,000 and 14,000 years ago, in the last stages of the Pleistocene glaciation. The earliest securely dated Paleoindian site is in Monte Verde, Chile, where dates as early as ca. 11,800 B.C. have been obtained (Dillehay 1989). It is not yet known precisely when humans settled in the project region, but they were definitely present by around 9500 B.C. The end of the Paleoindian period coincides with the Pleistocene/Holocene transition and in most areas of the Southeast is given an arbitrary terminal date of 8000 B.C. (Bense 1994).

By 8000 B.C. environmental conditions were approaching those that exist today. North of 33° N¹, patchy enclaves of xeric boreal forest/parkland vegetational communities were gradually replaced by widespread stands of mesic oak-hickory forests. This forest type lasted until large-scale Afro/Euro-American agriculture and construction severely modified the landscape. South of that parallel, the oak-hickory canopy was present much earlier (Delcourt and Delcourt 1985). The project area lies just south of the postulated vegetational interface (33° 40' N) and, given the coarse-grained nature of this reconstruction, it is not possible from the available data to determine whether the oak-hickory regime was present in the area during most or all of the Paleoindian period, or whether there was a change from the boreal forest/parkland regime to oak-hickory at that time.

¹ As a reference point, Macon, Georgia, is about 13 km south of 33° N.

The Paleoindian lithic tool kit was based on a highly refined flake and blade technology. Examples of Paleoindian lithic tool types include: unspecialized flake tools; formal side and end scrapers; graters; denticulates; specialized hafted unifacial knives; large bifacial knives; and specialized lanceolate projectile points, which were sometimes fluted. The best known of these is the Clovis point, the earliest recognized projectile point type in the western hemisphere (dating 9800–9000 B.C.). Clovis variants have been found from Canada to the southern tip of South America.

Table 4: General Cultural Chronology for the Prehistoric Occupation of the Fort Gordon Region.

Date Range	Period	Phase	Diagnostic Artifacts*
A.D. 1450–1575	MISSISSIPPIAN	Pine Harbor?	Ceramics with reed-punctated, appliquéd rim strips on large jars, intricate incising on small jars, cazuelas with multiple-line incising, and vessels with bold incising and punctation
A.D. 1350–1450		Irene II	Irene ceramics including large jars with appliqué and segmented rim strips, carinated bowls, and small jars decorated with simple scroll designs and various straight-lined, curved, and angular incised parallel lines
A.D. 1300–1350		Irene I	Irene ceramics including large jars with plain surfaces
A.D. 1200–1300		Savannah II	and vessels with reed punctated and noded rims Savannah check-stamped vessels, carinated bowls with plain surfaces, large complicated-stamped jars, and vessels with noded rims
A.D. 1150–1200		Savannah I	Savannah ceramics including large jars with check-stamped surfaces, cord marked vessels, and carinated plain bowls
A.D. 500–1150	LATE WOODLAND		Rectilinear complicated stamped ceramics
A.D. 300–500	MIDDLE WOODLAND	Deptford II	Deptford plain, simple stamped, check stamped, and cord marked ceramics
400 B.C.–A.D. 300		Deptford I	Deptford linear check stamped, check stamped, plain, cord marked, and simple-stamped ceramics with parallel or crossed designs that are more controlled than in Refuge wares and more often with U-shaped (as opposed to V-shaped) grooves suggesting use of paddle
600–400 B.C.			
800–600 B.C.	EARLY WOODLAND	Refuge II	Refuge simple-stamped and plain ceramics
1000–800 B.C.		Refuge I	Refuge simple-stamped, dentate-stamped, punctuated, plain ceramics
1000 B.C.	LATE ARCHAIC		various stemmed points
		Lovers Lane	Kiokee Creek/Otarre/smaller Savannah River points;
1850–1450 B.C.			emphasis on quartz raw material; more fiber-tempered
		Mill Branch	ceramics; fewer soapstone slabs Savannah River Stemmed; emphasis on metavolcanic
2250–1650 B.C.			raw materials; perforated soapstone slabs; some fiber-tempered ceramics
2600–2250 B.C.		Paris Island	Paris Island Stemmed; perforated soapstone slabs and atlatl weights
3000–2600 B.C.			Various stemmed points

6000–3000 B.C.	MIDDLE ARCHAIC		Undefined Benton Influence?> Guilford/Brier Creek Morrow Mountain
8000–6000 B.C.	EARLY ARCHAIC		Kirk Stemmed <i>fl</i> Bifurcate« Palmer/Kirk> Taylor/Bolen/Big Sandy«
8500–8000 B.C.	PALEOINDIAN		Dalton
9000–8500 B.C.			Simpson/Suwannee/Quad
9800–9000 B.C.			Clovis

Note: The Archaic sequence overlaps considerably. The direction of overlap is represented by the following symbols: >represents overlap into later time periods; *fl* represents overlap into earlier time periods; and « indicates overlap into both earlier and later time periods.

* Illustrations and descriptions of many of these diagnostic artifacts can be found in the following sources: Williams and Thompson (1999), Cambron and Hulse (1983), and Justice (1987).

Although the Clovis point is generally recognized as the earliest tool form on the continent, a recent excavation at the Topper Site, on the South Carolina side of the Savannah River (Goodyear 2001, 2002), offers tantalizing evidence of a pre-Clovis occupation. Here, in stratigraphic position below the Clovis levels, researchers uncovered spatially clustered concentrations of chert flakes and chunks along with several flake tools. These tools, referred to as “bend break tools”, are essentially thin flakes broken to provide a chisel-like working edge, some of which exhibit use wear patterns suggesting use as a burin or graver. This apparent pre-Clovis occupation is also distinguished by exploitation of a separate chert source than that of later occupations (Goodyear 2002). Several researchers remain skeptical that these items are cultural, however. Research here is ongoing and is subject to intense scrutiny and discussion.

Formal variation in projectile point morphology began to emerge in regions of the Southeast by about 9000 B.C., probably due to restricted movement and the formation of loosely defined social networks and habitual use areas (Anderson 1995; Anderson et al. 1992). These later forms include the Cumberland, Suwannee, Simpson, Beaver Lake, and Quad types (Anderson et al. 1990; Justice 1987:17–43; Milanich and Fairbanks 1980). Some researchers (O’Steen et al. 1986, Anderson et al. 1987, Anderson et al. 1990) have sub-divided the Paleoindian period into three sub-periods (Early, Middle, and Late) based upon projectile point forms (Joseph et al. 1994:18).

A significant wood, bone, and antler technology was utilized as well. Organic materials such as these do not preserve in the acidic soils that cover much of the Southeast, and they are very rarely found. However, at sites where they have been preserved, primarily in Florida, it is clear that organic media such as wood, bone, and antler were very important. These materials were manufactured into projectile points, foreshafts, leisters, awls, and needles, to name just a few tool categories (Milanich and Fairbanks 1980: Figures 3, 5, and 6).

Original views of the Paleoindian subsistence economy were based on observations from a series of sites in the western United States where Paleoindian artifacts, particularly large, lanceolate, fluted points, were recovered in direct association with the remains of several species of now-extinct Pleistocene megafauna. Initial interpretations of Paleoindian subsistence suggested that these early inhabitants focused primarily on hunting such large mammals as mammoth,

mastodon, bison, ground sloth, giant armadillo, tapir, horse, wild pig, and caribou. Resources such as arboreal seed and nut crops as well as small mammals, birds, and fish were, until recently, assumed to have been minor dietary constituents.

Because of the striking similarity in Paleoindian technological organization that pervaded most regions of the western hemisphere until ca. 8500 B.C., the large-game-oriented subsistence model devised from evidence in the western United States was initially assumed to have applied to all Paleoindian economic systems, including those associated with groups in Georgia. However, archaeologists working in Georgia have yet to document a clear association between Paleoindian tools and the remains of displaced and extinct animal species known to have been present in the state as late as 11,000–10,200 B.P. (9000–8200 B.C.)—mastodon, bison, giant ground sloth, and giant armadillo, for example (Holman 1985:569–570).

Over the past 20 years there has been a reevaluation of Paleoindian subsistence, particularly for eastern North America, based upon data from sites such as the Meadowcroft Rockshelter in southwestern Pennsylvania. Cushman's (1982:207–220) analysis of the Paleoindian occupation at Meadowcroft Rockshelter suggests that the occupants were geared toward the type of broad spectrum resource utilization traditionally associated with the subsequent Archaic period. Her examination of the botanical remains indicates that various leafy plants, seeds, nuts, and berries (Cushman 1982:207–220) were important dietary components.

Broad-based Paleoindian subsistence is also indicated by evidence from Florida. At Little Salt Spring, an important underwater site in Sarasota County, Florida, a variety of smaller mammals, fish, plants, and reptiles (including a now-extinct form of giant land tortoise) have been shown to be constituents of the Paleoindian diet in that region (Clausen et al. 1979).

There is very little evidence of resource exploitation in the littoral by Paleoindian peoples living in the Southeast. This is likely the result of site obfuscation and destruction caused by coastal submergence during the Holocene, and not because the resources these ecozones contained were not utilized (e.g., Dunbar et al. 1988, 1991; Faught 2004).

In summary, new perspectives on Paleoindian subsistence economy emphasize the utilization of a broader spectrum of ecotones and resources and deemphasize the degree to which Paleoindians relied on large-game hunting for sustenance.

In the Eastern Woodlands, the majority of Paleoindian sites consist largely of diffuse lithic scatters at open locations, with more intensive occupations in rockshelter or cave settings. No conclusive evidence of permanent structures or long-term encampments has been located for this time period in the Southeast. The majority of the Paleoindian data recovered in Georgia to date is derived from surface scatters of projectile points and a small assortment of chipped stone implements collected from disturbed settings. However, limited data has been recovered from intact contexts (Anderson and Schuldenrein 1985; Elliott and Doyon 1981; Gresham et al. 1985; O'Steen et al. 1986).

Several models of early Paleoindian settlement patterning have been advanced in the past quarter century (see Anderson et al. 1992 for an overview). Some are concerned with Paleoindians in

general (Anderson 1990a; Kelly and Todd 1988; Martin 1973), and others with regional trends (Anderson 1995; Gardner 1983; Morse and Morse 1983). Most are mechanistic models that portray specific economic strategies as primary reasons for how Paleoindians settled upon and utilized the landscape. Each is slightly different in its focus, with primacy placed on one of three major influences: (1) the need to maintain access to prominent, high-quality raw material sources (e.g., Gardner 1983); (2) a preference for exploiting specific habitual use zones and staging areas (e.g., Anderson 1995); or (3) a nomadic or seminomadic existence dictated to a large degree by the movements and availability of large game (e.g., Kelly and Todd 1988).

There is a general consensus among archaeologists involved in Paleoindian research regarding Paleoindian settlement. Groups were probably each comprised of four or five extended families and counted 25–50 individuals. Marriage was almost certainly exogamous and residence was likely extralocal. This would have assured that primary social groups remained small enough to be economically sustainable, but linked with a larger, interactive social network that provided information, cooperation, and mates of suitable kin distance.

Primary social groups very likely met at predetermined locations with other groups at specific times of the year to cooperate in large-scale food acquisition (e.g., nut harvesting, fishing, shellfish gathering, etc.) and/or lithic resource extraction, as well as to exchange information, renew or create alliances, fulfill social obligations, find mates, and perform rituals (Anderson 1995). For most of the year, however, primary groups appear to have dispersed into loosely defined habitual use areas. They probably exploited a wide variety of economic resources and moved often to take advantage of seasonal resources. It is also possible that they periodically established logistical base camps and used them as staging areas for special activity forays.

Joseph et al. (1994:21–24) discuss the four site types identified by O’Steen et al.’s (1986) survey of the Wallace Reservoir. The site types are based upon the diversity of tools present, and include short-term camps, quarry camps, residential camps, and kill sites. Joseph et al. (1994:22) note that many of the sites identified at Fort Gordon appear to correspond with the residential camp type identified by O’Steen et al. (1986). O’Steen et al. (1986) noted that within the Wallace Reservoir, the Early Paleoindian sites occur on floodplains, while Late Paleoindian sites tend to occur on upland areas overlooking floodplains. This cultural landscape pattern suggests a gradual expansion from the Oconee River into the surrounding uplands (Joseph et al. 1995:21–24). Also noted was a shift to local raw materials within the Middle and Late Paleoindian periods (Joseph et al. 1994:22–24).

In their examination of the Paleoindian period at Fort Gordon, Joseph et al. (1994) also discuss settlement system theories based upon excavations at the Taylor Hill site in the Phinizy Swamp area of Richmond County, Georgia. Speculation on the function of the Taylor Hill site has resulted in different theories. Elliott and Doyon (1981) believed the site was a residential camp, while Anderson and Hanson (1988) and Anderson et al. (1990) believed the Taylor Hill site was a specialized logistical camp that provided access to a wide variety of natural resources due to its location near the Fall Line. The location of the Taylor Hill site would have allowed access to resources in both the Coastal Plain and the Piedmont, and may have served as an aggregation point for Paleoindian groups (Joseph et al. 1994:15).

Joseph et al. (1994:15–16) also discuss the swamp margin model proposed by Cantley et al. (1991) and Cantley and Raymer (1991), applying it to the Taylor Hill site. The swamp margin model is based on studies of Archaic settlements around swamps in Alabama. It is suggested that the environmental variability of swamps would have provided a wide variety of food resources, and the location of the Taylor Hill site near the Fall Line would have allowed access to additional resources in the Piedmont and Coastal Plain (Joseph et al. 1991:15–16).

The end of the Paleoindian period (ca. 8000 B.C.) is associated with the end of the Wisconsin Ice Age and the onslaught of new environmental conditions, which influenced how humans organized their society and coped with the environmental and social pressures that came about during the climatic transition. New settlement and subsistence patterns were established and regional technological innovations were developed. These trends are associated with the subsequent Archaic culture period.

As of 1995, six Paleoindian sites were identified within Fort Gordon. Outside of the base, another significant Paleoindian site investigated in Richmond County is the Pig Pen site, which featured a late Paleoindian Dalton component (Ledbetter 1988). Other Paleoindian sites in the vicinity of Fort Gordon have been found along Brier Creek south of the base (Anderson et al. 1990).

3.2.2 Archaic Period (ca. 8000–1000 B.C.)

The transition from Paleoindian to Archaic is loosely defined, and in the Southeast the chronological interface ranges from ca. 8000 to 6500 B.C. In Georgia, the transition has been arbitrarily designated as 8000 B.C. In addition to rapid changes in environmental conditions that were nearing completion by 8000 B.C. (Delcourt and Delcourt 1985), and the changes in utilitarian technology that were developed to cope with those changes, population demography and diversity in social organization distinguish the Archaic experience. A tripartite scheme, dividing the Archaic period into Early, Middle, and Late subperiods, is traditionally used to demarcate some of the important developments of this time. It should be emphasized, however, that these subdivisions are heuristic devices; changes across the Southeast were actually rather more gradual and nonuniform (Stoltman 1993).

Early Archaic (ca. 8000–6000 B.C.). Tool assemblages associated with the Early Archaic period are similar to those of the Paleoindian period, although a variety of ground stone tools first appear at this time. Notched and/or stemmed hafted bifaces replace lanceolate forms by 8000 B.C. in the Southeast. Big Sandy, Palmer-Kirk series, Kirk Corner Notched, Kirk Stemmed, and several bifurcate styles are the Early Archaic types known in the project area. Wear patterns suggest that these tools were utilized for activities such as killing, butchering, and skinning game, as well as woodworking.

The Early Archaic lifeway is represented by social, settlement, and subsistence strategies designed to take advantage of the biotic diversity of the early Holocene environment, and also to cope with movement restrictions placed upon some Early Archaic populations because of increased population. Environmental conditions were becoming similar to those that the first

Europeans encountered in the sixteenth century. Hardwood primary forests and extensive palustrine swamps provided large and small game as well as a variety of plants for medicine, subsistence, clothing, and shelter. Rivers were used as travel corridors and provided fresh water, fish, and shellfish. The only areas of low productivity would have been the pine stands that began to emerge in the uplands by about 6000 B.C. (Delcourt and Delcourt 1985).

Joseph et al. (1994:26) note that several models of settlement and social organization have emerged as a result of excavations conducted at southeastern Archaic sites. They discuss three of the models, based upon Anderson and Joseph's (1988) synopsis, including Cable's (1982) "effective temperature/technological organization" model, the Wallace Reservoir model proposed by O'Steen (1983), and Anderson and Hanson's (1988) "band/macroband" model.

Cable's (1982) "effective temperature/technological organization" model postulates that the transition from the Paleoindian to the Archaic periods, and the resultant Archaic settlement and social organization, is tied to the climactic changes and gradual warming during the Holocene (Joseph et al. 1994:26). The model states that mobility of groups increased as the temperature increased. The model also suggests that the increase in residential mobility would be reflected in a shift from curated to expedient technologies more suited to a forager adaptation (Joseph et al. 1994:27).

The Wallace Reservoir survey conducted by O'Steen (1983) found that Early Archaic sites are most likely to occur in areas that contain the greatest diversity and density of resources; specifically, drainages. Both multi-component and single component sites were examined. The majority of the multi-component sites were located at drainage confluences. These sites were considered spring, summer, or fall base camps. The remaining multi-component sites located in the uplands were considered fall or winter camps. No settlement pattern was identified for the more numerous single component sites. These sites were viewed as transitory hunting or butchering sites (Joseph et al. 1994:27).

O'Steen (1983) estimated that approximately 80–200 people could be supported by the resources in the reservoir, based upon the carrying capacity of the area, and upon estimates of band size. O'Steen (1983) argues that the Early Archaic occupation of the reservoir was sedentary, and focused on a relatively small territory, based upon the contention that hunter/gatherers in ecologically diverse, temperate environments tend towards a sedentary lifestyle (Joseph et al. 1994:27).

Anderson and Hanson (1988) propose a "band/macro-band" model for Early Archaic settlement. This model proposes two levels of band organization: local bands consisting of 50–150 members, and macro-bands consisting of 500–1,500 members. Four factors were seen to influence the structure of Early Archaic settlement and social organization: availability of resources based upon seasonal and geographic variation; availability of mates; the extent of social and economic interaction among groups, including the exchange of information and resources; and the size and locations of groups (Joseph et al. 1994:28).

Anderson and Hanson (1988) propose an "annual settlement round" to explain the Early Archaic settlement pattern, in which mobility is required for resource procurement and group interaction.

Groups utilized resources in the Coastal Plain during the spring, moving to the Piedmont during the summer and fall to utilize resources available there. Groups would return to drainages directly below the fall line for the winter, interacting with other groups from nearby drainages at this time (Joseph et al. 1994:28).

While analyzing the distribution of artifact types among seven sites identified during the Savannah River study, Anderson and Hanson (1988) noted several characteristics of the assemblages. The differences in artifact types between sites were attributed to specific site functions. Most of the tools used were expedient, and local raw materials were used. A gradual transition was noted in the distribution of raw material types used among the sites, indicating social interaction or migration (Joseph et al. 1994:28–30).

Hanson (1988) and Sassaman et al. (1990) have refined the “band/macro-band” model, and applied it to the Savannah River Site. This refined model proposed that winter residential base camps would be located along the first terraces of the Savannah River, where domestic activities were conducted. Two zones were proposed, a Foraging Zone, and a Logistical Zone, based upon the distance from the Savannah River. Foraging zones would be located around each base camp, providing small game, plant foods, and raw materials. Logistical zones would be further away from the base camp, to obtain larger game and other raw materials. Sites within the logistical zone would consist of tool caches, expedient tools, and exhausted tools (Joseph et al. 1994:30–33).

Joseph et al. (1994:33) conclude that the Fort Gordon area was likely a logistical zone during the Early Archaic, and that short-term camp sites are to be expected at Fort Gordon. Logistical camps are suggested to occur along drainages, which are more likely to attract game. A total of 67 Early Archaic components were identified at Fort Gordon as of 1995, comprising 14.5 percent of the identified sites.

Middle Archaic (ca. 6000–3000 B.C.). The advent of the Middle Archaic period coincides with the climatic warming trend sometimes termed the Altithermal. The effect of this Holocene-era thermal maximum on environmental conditions in the Southeast is poorly understood, however, and it is unclear if the technological and economic conditions that became manifest in the Middle Archaic were primarily adaptive responses to environmental changes, or if social and political pressures are mainly responsible for their appearance.

Diagnostic hafted biface types dated to this period include Stanly, Morrow Mountain, and Guilford, as well as those that belong to the MALA series. MALA is an acronym for Middle Archaic/Late Archaic, referring to the temporal position of these specimens, and it is used to describe a group of hafted biface types that exhibit lanceolate, stemmed, and notched configurations (Sassaman 1985; Sassaman and Anderson 1994). The lanceolates are often referred to as Brier Creek lanceolates (Michie 1968); the notched and stemmed forms do not have formal type names but they are very similar to forms associated with the Benton series.

Although all of these hafted biface types are known to occur in Georgia, the Morrow Mountain styles are the diagnostic hafted bifaces most frequently encountered in the Georgia Piedmont. Morrow Mountain hafted bifaces also occur in Middle Archaic contexts on the Coastal Plain, but

in much smaller numbers (Stanyard 2003).

Piedmont Middle Archaic sites generally are small, randomly distributed occupations exhibiting very little intersite technological variability (Stanyard 2003). Local raw materials were used almost exclusively, and the vast majority of tools were technologically expedient (Blanton and Sassaman 1989; Sassaman 1993a). In terms of social organization, small hunting and gathering bands of 25–50 people probably still formed the primary social and economic units. Residences were moved frequently, subsistence was generalized, and social groups were small, mobile, and likely co-residential. Long-term investments and social obligations were probably kept to a minimum, insuring that there were very few restrictions on group movement or fissioning (Sassaman 1993b). Joseph et al. (1994:34) refer to this model as the “adaptive flexibility” model.

By contrast, large-scale tool production and intensive occupation characterize many Middle Archaic habitations in the Coastal Plain, especially in the latter half of the period (Sassaman 1988). This is likely due to the patchy distribution of both lithic and organic resources in that region, as opposed to the relatively homogeneous distribution of resources that characterized the Georgia Piedmont (Sassaman et al. 1990).

Joseph et al. (1994:34–35) also describe the “riverine-interriverine” model as theorized by House, Goodyear, and others (Goodyear et al. 1979; House and Ballenger 1976). This model suggests that base camps were located along river floodplains, and resource extraction and procurement sites were located in upland and interriverine areas. The model also suggests a differentiation in site function, contents, and complexity. Joseph et al. (1994:35) note that there seems to be a lack of larger and more complex Middle Archaic sites that would typify base camps, and suggest that the high number of small Middle Archaic sites represent multiple short-term activity sites rather than reflect an increase in population.

Subsistence data is scarce, but it is assumed that a variety of interior floral and faunal resources were exploited on both a general (e.g., white-tailed deer) and seasonal (e.g., nuts, fish, and migratory waterfowl) basis. It is probable that coastal and riverine resources—marine shellfish, freshwater shellfish, and anadromous fish, for example—were exploited to some degree, but their economic importance is unknown due to the lack of Middle Archaic components that can be unequivocally associated with these types of remains. This void can be partially attributed to coastal submergence and rising sea level, which has inundated previously exposed coastline and obfuscated the importance of littoral resources in this and earlier eras (Brooks et al. 1990).

During a 1991 survey of Fort Gordon, few Middle Archaic components were identified, but subsequent survey has identified 38 Middle Archaic sites, comprising 10.8 percent of identified sites (Braley and Price 1991; Braley and Benson 1994; Joseph et al. 1994:35).

Late Archaic (ca. 3000–1000 B.C.). The hafted biface most commonly associated with the Late Archaic period in Georgia is the Savannah River point. These point types are often very large (12+ cm in length is not uncommon) and exhibit a straight stem, straight base, and triangular blade.

Other Late Archaic varieties found in the project region are known by various names such as Appalachian Stemmed, Kiokee Creek, Ledbetter, Otarre, and Paris Island (Bullen and Greene 1970; Cambron and Hulse 1983; Chapman 1981; Coe 1964; Elliott 1994; Harwood 1973; Keel 1976; Sassaman 1985; Whatley 1985). Except for the Ledbetter hafted biface, which appears to have had a specialized function—it exhibits a heavily reworked, asymmetrical blade—these type names are more a product of parochial terminology than actual morphological differences. Like Savannah River hafted bifaces, they are characterized by triangular blades, straight or slightly contracting stems, and straight bases. The primary difference is size; Savannah River points tend to be longer and wider than the other types.

The earliest ceramics in the region were tempered with fiber. According to radiocarbon evidence obtained from Rabbit Mount, a Late Archaic shell midden along the southern portion of the Savannah River in Allendale County, South Carolina, this ceramic technology may have been introduced as early as 2500 B.C. (4465±95 B.P.). This date, and another of 4450±150 B.P., were obtained from wood charcoal recovered from excavation levels containing fiber-tempered sherds (Stoltman 1966).

The earliest ceramic-bearing components on the Georgia Coast date to approximately 2200 B.C. (Sassaman 1993b). It is possible that coastal groups produced and used pottery prior to 2200 B.C., but that sea level rise may have inundated earlier ceramic-bearing assemblages. It is also possible that ecological restrictions may have prevented humans from occupying the present-day coastline before 2200 B.C. (Sassaman 1993b:19).

A detailed Late Archaic phase sequence exists for the Savannah River region in the vicinity of Fort Gordon. The Paris Island phase is the earliest local Late Archaic phase. It was defined based on excavations in the Russell Reservoir, where small, stemmed points, including Paris Island Stemmed, were linked to pre-ceramic Late Archaic components (Elliott et al. 1994). Other artifacts include perforated soapstone slabs and ovate atlatl weights. A series of radiocarbon dates suggests a time range of 4550–4200 B.P. (2600–2250 B.C.) (Elliott and Sassaman 1995:42). The subsequent Mill Branch phase (ca. 4200–3600 B.P. or 2250–1650 B.C.) was defined partially on the basis of excavations at 9WR4, roughly 10 miles south of the project area (Elliott et al. 1994; Ledbetter 1991). Excavations at 9WR4, revealed an assemblage of distinct artifact types from a cluster of well-preserved features, including a semi-subterranean house floor (Ledbetter 1991). Associated artifacts include large Savannah River points, typically made of metavolcanic materials, perforated soapstone slabs, drill cores, winged atlatl weights, cruciform drills and small amounts of fiber-tempered pottery. Sites with Mill Branch phase components include Mill Branch, Toliver, Chase, 9RO7, and 9RO20 (Ledbetter 1991, 1994; Stanyard and Stoops 1995; Stanyard 1997). A shift back to quartz and chert as the preferred lithic raw material characterizes the following Lovers Lane phase. Other trends observed include a decreased use of soapstone cooking slabs, fewer atlatl weights and drills. Fiber-tempered pottery saw continued use, and associated point types include Kiokee Creek stemmed, Otarre and smaller versions of the Savannah River type. A time range of 3800–3400 B.P. (1850–1450 B.C.) is suggested (Elliott and Sassaman 1995). This phase corresponds to previously defined phases in the Middle Savannah River area, including Stallings III (Stoltman 1974) and Sassaman's (1993c) phase II.

After around 1550 B.C. (3500 B.P.) in the central Savannah River, large riverine sites were abandoned and populations made increased use of upland areas for multiseasonal habitations. This period is marked by increasingly divergent material culture. A wide variety of stemmed bifaces saw continued use but temporal associations are unclear.

The most intensively occupied Late Archaic site yet discovered in Georgia is on Stallings Island, located in the Savannah River in Columbia County (Bullen and Greene 1970; Claflin 1931; Crusoe and DePratter 1976; Fairbanks 1942; Jones 1873). One type of bone tool found at Stallings Island is the bone pin. These objects are intricately decorated and highly prized by artifact collectors. Unfortunately, they were mined at the site until recent measures were taken to prevent unauthorized access there. The mining has devastated the site; large potholes and mining trenches have destroyed much of its integrity.

This unfortunate circumstance notwithstanding, a great deal has been learned from professional excavations at Stallings Island. Large quantities of projectile points, drills, grooved axes, perforated soapstone slabs, and other formal lithic, bone, and antler tools have been discovered. Plain and punctated fiber-tempered ceramics, which bear the type name Stallings, have also been recovered.

The earliest Late Archaic levels at Stallings Island have been dated to between 2700 and 2450 B.C. (Williams 1968). These basal levels lacked ceramics but, among many other tool types, contained classic Savannah River projectile points (Coe 1964). Subsequent excavations elsewhere in the region have shown that these large classic Savannah River points are associated with the incipient use of fiber-tempered ceramics (Elliott 1994:370). Ceramics have been dated as early as 2500 B.C. in the region, but they did not appear at Stallings Island until about 1730 B.C., when ceramic technology first began to be utilized on a regional scale. Projectile point styles associated with the ceramic levels at Stallings Island are smaller than Savannah River point types and tend to have slightly contracting, rather than straight, stems (Bullen and Greene 1970). Elliott (1994) refers to this technological expression of the Late Archaic period as the Lovers Lane phase and frames it between about 1800 and 1400 B.C.

Curiously, soapstone vessels, a hallmark of the Late Archaic in the interior of Georgia, are almost absent in the archeological record at Stallings Island specifically ($n = 1$ sherd [Elliott et al. 1994]) and in the central Savannah River Valley in general. This is despite several nearby sources of soapstone that were used to obtain raw material for perforated slabs, gorgets, and bannerstones.

Sassaman has recognized a correlation between pottery use and soapstone utilization in Late Archaic groups inhabiting the fall zone and coastal plain region of the Savannah River Valley (Sassaman 1993b). During the early part of the Late Archaic (ca. 3000–2200 B.C.), fall zone and coastal plain groups utilized soapstone as cooking slabs for indirect cooking in fiber-tempered pots. Sassaman has introduced evidence that the residents of the fall zone were exchanging soapstone slabs with coastal plain people for some unknown commodity (Sassaman 1993b: 213– 215). By 2200 B.C., however, soapstone slabs disappear from the archaeological record of the coastal plain. It was at this time (Group I/St. Simons I/Stallings II) that ceramic vessels began to be used for direct fire cooking in the interior coastal plain and on the coast.

Soapstone slab manufacture continued among fall line groups until about 1500 B.C., however, in a social context that apparently precluded the use of ceramic vessels for direct fire cooking. Pottery continued to be used for indirect cooking with heated soapstone slabs. The break in the exchange conduit between the Fall Line and Coastal Plain at approximately 2200 B.C. is thought to represent the appearance of two distinct social entities with diverging historical trajectories, one associated with the interior Coastal Plain and Coast and one identified with the fall zone environs of the central Savannah River valley. While Coastal Plain groups applied new ceramic technology to cooking innovations and found little need for soapstone slabs, fall zone residents resisted changes in cooking technology. Sassaman (1993b) postulates that this was because the control of soapstone in general, and soapstone slabs specifically, played an important role in the acquisition and maintenance of power in their society. By 1500 B.C., that once cohesive social entity had dissolved, and power was no longer manifest in the control of cooking technology. As a result, direct fire cooking became widely adopted in the region.

Late Archaic settlement patterns varied significantly for those that inhabited the fall zone versus those occupying the coast. Recent modeling of Late Archaic settlement organization for groups near the Fall Line is based on extensive archaeological investigations in the Savannah River region and surrounding area (Brooks and Hanson 1987; Elliott et al. 1994; Ledbetter 1991; Sassaman 1983; Sassaman et al. 1990; Stanyard 1997). This scenario posits that groups congregated in large numbers at specific locations along the Savannah River in the spring and summer; Stallings Island and Lake Spring are two notable sites where this is thought to have occurred. Base camps were established near the mouths of large tributaries; they functioned as multi-household staging areas from early spring through fall. In the late fall and winter months, small groups dispersed into the uplands along smaller tributaries of large rivers and led a relatively autonomous existence within specified foraging zones. Some of these fall/winter hunting territories extended far into the Piedmont, along the Oconee and Upper Ocmulgee drainages in Georgia (Stanyard 1997) and the Santee River drainage in South Carolina (O'Steen 1994). In the spring and summer, subsistence was directed toward obtaining freshwater shellfish and anadromous fish. White-tailed deer was also important, as were smaller mammals, freshwater fish, birds, and turtles (House and Ballenger 1976; Stoltman 1974). In the late fall/winter dispersal, it is suspected that a focus was placed on white-tailed deer and comestible nuts, such as hickory nut, walnut, and acorns.

Coastal groups, on the other hand, are thought to have been fairly sedentary (DePratter 1979; Trinkley 1980). They maintained permanent residences in the littoral zone and made forays into estuarine and interior settings for specific needs. The permanent settlements are recognized as shell rings, while amorphous shell mounds are thought to represent base camps. Interior sites do not have a defining characteristic (Marrinan 1975; Simpkins 1975; Trinkley 1980; Waring and Larson 1968). Interior sites on the Coastal Plain near the project region that are attributable to coastal groups likely served a short-term specialized function. These occupations were generally small and ephemeral; the cultural deposits reflect the specific nature of the occupation, such as a hunting camp.

The upland setting within the Fort Gordon area would provide locations suitable for fall and winter settlements. Previous archaeological surveys have identified 89 Late Archaic components at Fort Gordon, accounting for 22.1 percent of identified sites. These sites are thought to

represent seasonal households and logistical camps (Joseph et al. 1994:40).

Late Archaic architecture is not well understood and only a few examples have been investigated in the interior. Six structures associated with the Late Archaic occupation of the Lovers Lane site in Richmond County have been documented (Elliott et al. 1994). All were subrectangular or oval in plan; one was determined to be a pithouse. The smallest structure measured 5 × 8 m and the two largest 8 × 8 m. None of the structures contained discernible hearths. Excavations at 9WR4, in Warren County, Georgia, discovered another Late Archaic pithouse measuring approximately 4 × 5 m (Ledbetter 1991:200). It was subrectangular in plan and approximately 35 cm deep (Ledbetter 1991:200). Large corner posts and a few wall posts defined the perimeter. A large hearth area in the eastern portion of the structure is interpreted as a hearth and earth oven that may have been partitioned (Ledbetter 1991:201); three caches of debitage surrounded the hearth area.

Although post holes have been discovered below the large shell middens that characterize coastal settlements, structures associated with these occupations have never been completely delineated. Therefore, very little data concerning their size, shape, or function exists. It is presumed that a major factor in the inability to identify structures is that they were often constructed within the shell midden, and their configuration has become obfuscated by human activity subsequent to their occupation (Waring and Larson 1968; Marrinan 1975).

Shellfish were very important to Late Archaic populations that inhabited the coast, as evidenced by the large accumulation of shell at coastal sites. The degree of their importance to subsistence is debated, however. Based on the sheer amount of shell that had accumulated, early researchers believed that shellfish exploitation significantly affected both settlement and subsistence. Shellfish were thought to have decreased the need to hunt deer and other mammals and to have freed [people] from the necessity of continually moving in search of food (Caldwell 1958:14).

More recent research has demonstrated that, while mollusks were nutritionally important, they were likely used to supplement a broader diet. Faunal evidence indicates that a variety of animals such as white-tailed deer, various small mammals, turkey, waterfowl, turtles, fish, and crustaceans were eaten in significant quantities (Parmalee and Klippel 1974; Marrinan 1975; Trinkley 1980).

Plant foods such as nuts (hickory and acorn), fruits (hackberry), and seeds (hawthorn) have been discovered at many sites in variable quantities (Marrinan 1975; Trinkley 1986). Nuts were probably a major food source, especially in the fall; hackberry and hawthorn presumably supplemented sustenance as well. Although lacking in the archaeological record, many other plant materials are assumed to have been used not only for sustenance but as medicine, fabric, and construction material. There is no conclusive evidence that horticulture was practiced by Late Archaic people in the Southeast, but it is possible that the growth of certain useful opportunistic plants was encouraged by clearing overstory and protecting certain established plant communities. If low intensity horticulture was being practiced in the area (as it was in some other parts of the Southeast), the most likely cultigens are squash (*Cucurbita* sp.) and starchy seed plants (e.g., *Chenopodium* sp.).

The end of the Archaic period and advent of the Woodland era is an arbitrary demarcation created by archaeologists in recognition of the widespread adoption of an improved ceramic technology by 1000 B.C.

3.2.3 Woodland Period (ca. 1000 B.C.–A.D. 1150)

The improved ceramic technology that became widely available by 1000 B.C. in the Southeast greatly altered food storage and preparation capabilities, though it did not have an immediate effect on subsistence. Throughout most of the Woodland period, subsistence strategies were a continuation of earlier hunter-fisher-gatherer ways. On the lower coastal plain and coast, cultigens did not begin to play an important economic role until approximately A.D. 1300.

With a few exceptions, the nature of Woodland peoples' ideological and nonsubsistence-related economic systems are more accessible to modern researchers than those of earlier peoples because they involved activities, architecture, and artifacts that are more visible in the archaeological record. For example, large mounds associated with the mortuary, ceremonial, and status-related domestic domains first appear by about A.D. 1. Also, large quantities of magico-religious and prestige goods manufactured from such durable media as stone and unsmelted metal were deposited in and around these mounds beginning at approximately this time. The Woodland period also witnessed intensified participation in long-distance trade and exchange in exotic materials such as copper, mica, obsidian, and marine shell, hallmarks of the phenomenon known as the Hopewell Interaction Sphere (Seaman 1979).

The introduction of very small triangular projectile points (<1–3 cm in length) around A.D. 600 suggests that bow and arrow technology was adopted in the southeastern United States at about this time.

Ceramics became more refined, and regional technological differences, particularly with respect to temper, paste, and surface decoration, became manifest during the period. Woodland cultures are often discussed and categorized by reference to established ceramic types. Woodland period ceramic types frequently recovered in the project vicinity include: Refuge Plain, Punctate, Incised, Simple Stamped, and Dentate Stamped; Deptford Simple Stamped, Check Stamped, Linear Check Stamped, Zoned-Incised, and Cord Marked; Swift Creek Plain and Complicated Stamped; Napier Complicated Stamped; Wilmington Plain, Cord Marked, and Brushed; and St. Catherines Plain, Cord Marked, and Net Marked.

Diagnostic projectile point styles attributable to Woodland developments south of the Fall Line include small-stemmed specimens, large and small triangular types, and notched varieties. The Woodland period, like the Archaic, is divided into three subperiods—Early, Middle, and Late—based upon major demarcations in general social patterns. As with the Archaic period, changes were actually more gradual and nonuniform across the Southeast than the discussion intimates.

Early Woodland (ca. 1000–500 B.C.). The Late Archaic/Early Woodland interface is placed at ca. 1000 B.C. based on extensive archaeological evidence that an improved ceramic technology was developed and widely adopted by this time. Early Woodland social formations on the

Georgia Coast and Coastal Plain arose out of the dissolution of the relatively centralized populations that previously inhabited the region.

Along the Georgia Coast and on the Coastal Plain, the onset of the Early Woodland period is recognized archaeologically by the appearance of Refuge ceramics. This pottery complex was defined by Waring (1968) based on data obtained from the Refuge site, which is on the southern South Carolina coast. Waring described four types of surface decorations associated with the Refuge ceramic series: Refuge Punctate, Refuge Incised, Refuge Simple Stamped, and Refuge Dentate. These surface treatments are still used as diagnostic criteria for identifying Early Woodland occupations in the region.

Two Early Woodland sub-phases are recognized in the Middle Savannah River area (Sassaman et al. 1990). Refuge I assemblages (3000–2800 B.P. or 1050–850 B.C.) contain simple-stamped, dentate-stamped, punctuated, and plain pottery. Only simple-stamped and plain pottery is associated with Refuge II (2800–2600 B.P. or 850–560 B.C.). These ceramic types will be described in further detail below. Associated bifaces include small stemmed and notched forms resembling the terminal Late Archaic types. These are usually more crudely made and smaller than their antecedents and not easily accommodated by conventional classification schemes. Triangular points (i.e., Yadkin) may appear at a slightly later date in the Coastal Plain than in the Piedmont, where they are a hallmark of the Early Woodland Kellogg phase. However, in the Middle Savannah River area, Sassaman et al. (1990:162) observe that on Middle Woodland sites that lack Early Woodland components, triangular points and Deptford pottery are associated in the absence of stemmed points. Where both Early and Middle Woodland components are present stemmed points prevail, suggesting that triangular points were introduced after the appearance of Deptford pottery, and then rapidly and thoroughly replaced the stemmed biface tradition around 50 B.C. (2000 B.P.).

Survey data from the Savannah River Site indicates that the pattern of upland land use that began during the Late Archaic continued into the Early Woodland period (Sassaman et al. 1990). Noting the abundance of Early Woodland sites along upland tributaries at the Savannah River Site, Brooks and Hanson (1987) suggest that occupation of upland tributaries became more permanent and with territories restricted to individual tributaries as climatic changes rendered floodplains more productive.

Survey data from the Mill Branch Tract, west of Fort Gordon, indicates frequent use of the area during the Early Woodland period. Excavations at two of the Mill Branch sites (9WR4 and 9WR11) revealed two partial post patterns suggesting two separate Refuge phase structures (Ledbetter 1991). Simple-stamped sherds were recovered from the post holes and surrounding vicinity. At 9WR11, simple-stamped pottery was found in deposits radiocarbon dated to 2820 ±117 B.P. (ca. 870 B.C.). Benson (2003) reports a steady decrease in lowland occupation from the Middle Archaic through the Middle Woodland, suggesting a pattern of increased exploitation of upland areas similar to that at the Savannah River Site. However, the Fort Gordon area appears to have been less intensively settled than the Savannah River Site during the Early Woodland period.

Simple stamping of ceramics was a technique developed in the Late Archaic but was used as a

decorative motif until the end of the Middle Woodland. As a result, the sand/grit-tempered wares associated with the Early Woodland (Refuge) and Middle Woodland (Deptford) periods are difficult to distinguish. Waring (1968:200) noted that Refuge simple stamping tended to be haphazard and that the lips of these vessels were sometimes notched. Deptford wares, by contrast, primarily exhibit parallel or crossed designs that were applied with more control. Recent stratigraphic evidence obtained from 38AK157, which is on the Aiken Plateau at the Savannah River Site in Aiken County, South Carolina, suggests that Refuge simple stamping can be distinguished from Deptford on the basis of the decorating technique (Anderson in Sassaman et al. 1990). Anderson (Sassaman et al. 1990) observed that there were proportionally more sherds with V-shaped grooves than U-shaped grooves. In addition, parallel and evenly crossed designs were present in proportionally larger numbers in the upper levels, while sloppy designs were more prevalent in the lower levels. It is suggested that the earlier, more haphazard designs were applied with a dowel or stick, while the more controlled designs were applied with a carved paddle (Anderson in Sassaman et al. 1990). Since the check-stamped pottery associated with Deptford was definitely created with a carved paddle, Sassaman postulates that the even, U-shaped groove simple stamping is associated with Deptford, while the haphazard V-shaped design was produced by people associated with Refuge ceramics. Although the data from 38AK157 is useful when dealing with large assemblages, distinguishing between Refuge and Deptford simple-stamped designs is an imprecise exercise when sample sizes are small.

Refuge ceramics from sites on the Georgia Coastal Plain and coast are usually grit-tempered and generally have a very sandy paste. Grog tempering occurs in a minority of wares found in the South Carolina Coastal Plain (Anderson 1982), but is dominant on the Refuge series of the Santee River (Espenshade and Brockington 1989). The predominant vessel form is a hemispherical bowl with a rounded base. Deep, straight-sided jars were also produced but in lesser numbers. Rims are incurving or straight; the lips are rounded or squared and are occasionally decorated (DePratter 1979). Punctations and incising sometimes occur on vessel interiors (Anderson in Sassaman et al. 1990)

With the exception of ceramics, very little is known about Refuge material culture. Diagnostic lithics associated with the Refuge phase consist of small, stemmed hafted bifaces that are similar to the varieties manufactured in the later part of the Late Archaic period. Lithics occur in low frequencies at Refuge sites, which may indicate that the lithic sources in the interior were not easily accessible (Hanson and DePratter 1985). Another reason lithics are not abundant, one that may or may not be directly related to the availability of lithic material, is the ready accessibility of shell. Shell and bone tools are common additions to components of this age (Lepionka 1983).

The Refuge phase has been divided into subphases based on temporal differences in the popularity of ceramic surface design types. DePratter (1979) describes three subphases, Refuge I, Refuge II, and Refuge III. In his scheme, Refuge I dates to ca. 1100–1000 B.C. and is defined by punctate and incised wares. Dentate stamping appears approximately 1000–900 B.C., and the appearance of that design demarcates Refuge II. According to DePratter, Refuge III (ca. 900–400 B.C.) is defined by the manufacture of linear check and check-stamped wares. Plain and simple-stamped pottery was manufactured throughout all three subphases. But Anderson (Sassaman et al. 1990) argues that, given the general lack of radiocarbon dates, DePratter's chronology is too refined. In addition, there is no conclusive evidence that linear check and

check-stamped designs were in use as early as 900 B.C. Sassaman (1993c:190) suggests that only two subphases are recognizable with the Refuge ceramic complex. Refuge I dates to ca. 1000–800 B.C. and is defined by Refuge Punctate and Refuge Dentate designs. Refuge II is characterized by the absence of punctate and dentate surface designs and by the emergence of plain and simple-stamped surfaces as the primary design types. According to this chronology, Refuge II occurred between approximately 800 and 600 B.C.

The social transformations at the end of the Late Archaic resulted in population decentralization (Sassaman 1991, 1993c; Stanyard 1997). Small groups disengaged from their social obligations to the larger community and created dispersed year-round settlements. People that produced Refuge ceramics settled the fall zone uplands, the lower Coastal Plain interior, and the Coast. Upland and interior sites tend to be on well-drained ridges, while coastal sites are often situated near marshes in riverine and estuarine settings (DePratter 1976). The upland and interior sites are usually small and lack evidence of intensive utilization (Hanson and DePratter 1985; Sassaman 1993c). The coastal sites usually contain large middens and appear to have been utilized more intensively and extensively (Hanson and DePratter 1985). This pattern suggests that coastal and lower Coastal Plain sites functioned as permanent or semipermanent residences, while interior sites perhaps served as single-household seasonal base camps.

Subsistence was generalized, and the resource base was very similar to that of the Late Archaic period, with the possible exception of shellfish. White-tailed deer, bear, a variety of small mammal species, reptiles, freshwater fish, marine fish, anadromous fish, and mollusks have been recovered from Refuge contexts (Marrinan 1975; Lepionka 1983; Hanson and DePratter 1985). Although shellfish were harvested during the Refuge phase, their degree of dietary importance appears to have been dramatically lower than it was in the Late Archaic. This may be due to lower productivity caused by sea level fluctuations (DePratter 1977). It is also possible that the larger shell midden sites are currently inundated, as sea level has risen about three meters since the Early Woodland period (Hanson and DePratter 1985).

Only 7.8 percent of the identified sites contain Early Woodland components at Fort Gordon. A lack of sand-tempered punctated sherds suggests that this area was not used extensively. As such, the Early Woodland period is poorly understood at Fort Gordon (Joseph et al. 1994:42–44).

Middle Woodland (ca. 600 B.C.–A.D. 500). The Middle Woodland period on the Coastal Plain and Coast is known as the Deptford phase; the term is derived from the ceramic series of the same name. Deptford wares exhibit plain, linear check-stamped, check-stamped, simple-stamped, cord-marked, and zoned-incised surface designs. Swift Creek Complicated Stamped pottery also appears in Deptford assemblages that date to the latter portion of the period. During the Deptford phase, similarities in ceramic technology and preference for specific surface designs indicate that the people of interior and coast interacted regularly. Deptford people resided in permanent villages, both in the interior and on the coast. No secure evidence indicates that horticulture was practiced to any significant extent. The resource base was essentially the same as that utilized in the Late Archaic period, as shellfish became an important resource once again, after its apparent decline in importance during the Refuge phase.

Two sub-phases, Deptford I and Deptford II, are defined for the lower Savannah River

(DePratter 1979). The distinction is based on observed differences in the relative frequencies of certain surface design types found in Deptford assemblages of different ages. Deptford Plain, Deptford Simple Stamped, Deptford Check Stamped, and Deptford Cord Marked vessels were produced during both Deptford I and Deptford II subphases, according to DePratter (1979:111–112). Deptford I (ca. 400 B.C.–A.D. 300) is defined by Deptford Linear Check Stamped pottery in addition to the types mentioned above. Deptford Linear Check Stamped designs were no longer produced during Deptford II (ca. A.D. 300–500), while Swift Creek wares appeared in assemblages at this time.

Anderson has proposed a chronological sequence for Deptford ceramics from the middle Savannah River valley that is similar to DePratter's, sequence for the coastal region (Sassaman, et al. 1990). Anderson places Deptford I between ca. 600 B.C. and A.D. 1 and defines it by the presence of Deptford Plain, Deptford Simple Stamped, Deptford Check Stamped, and Deptford Linear Check Stamped surface designs. Deptford II (ca. A.D. 1–500) includes the above with the exception of Deptford Linear Check Stamped motifs and the addition of Deptford Cord Marked, Deptford Zoned-Incised, and Swift Creek Complicated Stamped surface treatments. Anderson places the advent of Deptford II about 300 years earlier than DePratter implying that Deptford Cord Marked, Deptford Zoned-Incised, and Swift Creek Complicated Stamped designs were first introduced in the interior.

The Deptford ceramic series was defined on the basis of results obtained during WPA excavations at the Deptford site, a large shell midden along the Savannah River near Savannah (Waring and Holder 1968). Excavations at Deptford and at Evelyn Plantation demonstrated through stratigraphic evidence that Deptford ceramics were manufactured later than Stallings series pottery and earlier than those produced during the Wilmington phase.

Deptford pottery usually exhibits a sandy paste and medium to fine sand/grit temper. The primary vessel type is a cylindrical jar with a rounded or conoidal base; tetrapods may or may not be present. Rims are straight or slightly out-flaring, and lips are square, rounded, or beveled (DePratter 1979:123–127). Swift Creek pottery, which appears in Middle Woodland sites as early as 100 B.C. in northern and central Georgia, is not a frequent occurrence in the Middle Savannah River region, which is the eastern margin of this culture. When found, the majority of Swift Creek sites date to the later part of the period (Elliott 1998), and often are attributed to a Late, rather than Middle Woodland occupation (Anderson 1998).

Diagnostic lithics associated with the Deptford phase include small stemmed hafted bifaces and medium to large triangular hafted bifaces. Polished stone ornaments and pipes, engraved shell and bone, bone awls and pins, manos, metates, and a variety of formal and expedient chipped stone tools also occur in Deptford components (Hanson and DePratter 1985). Although some aspects of their material cultural are elaborate—platform pipes and engraved bone and shell, for example—there is no evidence that Deptford people participated in, or were significantly affected by, the Hopewellian exchange system that was flourishing in many parts of the eastern United States in the first few centuries A.D.

The following settlement model has emerged from extensive research on the Deptford phase (Milanich 1973); it applies to both interior Fall Line/upper Coastal Plain and lower Coastal Plain/coastal populations. Deptford people resided in permanent villages both in the interior and

on the Coast. At various times of the year, task groups were sent to specific locations in the surrounding area to obtain seasonally available resources or to extract important resources—lithic raw material, for example—that had become depleted. For example, marsh-edge sites, and the majority of interior sites, appear to be logistical encampments occupied by task groups obtaining seasonally available and/or specialized resources (Espenshade et al. 1993; Hanson et al. 1981). These specialized forays were probably of short duration. Mortuary sites consist of small sand mounds containing human interments; they appear to have been used solely as cemeteries (Thomas and Larsen 1979).

Four types of Deptford settlements are recognized on the lower coastal plain and coast: large, permanently occupied villages that contain midden deposits, marsh-edge gathering loci, interior specialized extraction sites, and specialized mortuary sites (Hanson and DePratter 1985; Milanich 1973; Sassaman et al. 1990).

Two of the best examples of large, permanently occupied village sites are Deptford (Waring and Holder 1968) and G. S. Lewis (Hanson 1985). Deptford contained Middle Woodland midden deposits that extended over 10 hectares. The site yielded evidence that several structures were once present and that the site was occupied year-round by at least a portion of the population (Waring and Holder 1968; Hanson and DePratter 1985). The G. S. Lewis site, in the interior upper Coastal Plain along the Savannah River, is a multicomponent site that also contained an extensive Deptford midden; cultural deposits extended over at least 5 hectares (Hanson 1985). Evidence of three or four Deptford structures was discovered in the course of investigations at G. S. Lewis. They are roughly circular, have central support posts, and are 4–6 m in diameter. At least 25 refuse pits used by the Deptford occupants were also encountered, as was a single burial (Hanson 1985; Hanson and DePratter 1985). This site appears to have been permanently occupied (Hanson and DePratter 1985; Sassaman et al. 1990).

Many of the Woodland period sites at Fort Gordon could not be attributed to a particular phase. The sherd temper and projectile points identified at these sites suggest Middle and Late Woodland phases. Eighty Middle Woodland components were identified at Fort Gordon, comprising 17.5 percent of all components (Joseph et al. 1994:45). The Fort Gordon survey data (Benson 2003) indicates that Woodland occupation was heaviest during the Middle Woodland. This may be due to the paucity of widely recognized Early and Late Woodland ceramic types in the area. In a similar vein, Sassaman reports that, at the Savannah River Site, Middle Woodland sites have a more widespread distribution than during the preceding period, with the densest sites occurring at stream confluences (Sassaman et al. 1990).

Late Woodland (ca. A.D. 500–1150). The Late Woodland period is poorly understood in the vicinity of Fort Gordon. No Late Woodland component was recognized at the Mill Branch sites (Ledbetter 1991) and few Late Woodland sites are documented along Briar Creek (Elliott and O'Steen 1987). Late Woodland ceramic assemblages in the Russell Reservoir contain Napier and Swift Creek B Complex pottery. Associated point types were described as small with contracting stems. Anderson and Joseph (1988) suggest that simple stamping and brushing, along with plain types, are probably more representative of the Late Woodland ceramic assemblages. At the Savannah River Site, there are no unambiguous diagnostic artifacts to date assemblages exclusively to the Late Woodland period, which is provisionally described as an

interior Wilmington equivalent (Sassaman et al. 1990). Associated ceramics include sand-tempered plain, cordmarked, and fabric-impressed pottery. At Fort Gordon, Late Woodland sites, which were identified by small triangular points and rectilinear complicated stamped pottery, comprised less than one percent of the site total (Benson 2003).

From what little is known, Late Woodland settlements are small, dispersed, and less integrated than those associated with the Deptford phase (Sassaman et al. 1990:14; Stoltman 1974). The subsistence economy was based on generalized hunting, fishing, and gathering. Although cultigens such as squash and corn had been introduced into the region by this time, they were not a significant source of sustenance (Wood et al. 1986). Very little attention has been focused on other aspects of material culture associated with Late Woodland societies inhabiting the Coastal Plain and Coast. The small to medium-sized triangular hafted bifaces associated with this period were also produced in subsequent eras, and therefore are not diagnostic when discovered out of context. In general, lithic tools are uncommon in Late Woodland assemblages. Shell and bone are known to have been used in a variety of ways, however. Whelk was an especially important raw material; it was used to manufacture awls, picks, chisels, adzes, abraders, toggles, and ornaments (Cable 1992; Trinkley 1989).

Late Woodland ceramics can be differentiated from Middle Woodland ceramics by the decline in Deptford stamped wares (Sassaman et al. 1990). In the Piedmont, Late Woodland ceramics include sand-tempered, complicated stamped Napier and Swift Creek wares. Wilmington Cord Marked ceramics found on the Coast and in the lower Coastal Plain are grog-tempered. The sand-tempered cord-marked pottery that occurs in the upper Coastal Plain and fall zone in the Savannah River drainage has also been included in the Wilmington Cord Marked category (Anderson 1985; Hanson and DePratter 1985; Stoltman 1974). By A.D. 1000, vessels with finer grog temper that exhibit burnished plain surfaces, fine cord marking, and, rarely, net marking were being produced. Ceramics with these traits belong to the St. Catherines series (Caldwell 1971; DePratter 1979).

These observed temporal differences in ceramic technology formed the basis for DePratter's (1979) chronology. In this scheme, Wilmington I dates to ca. A.D. 500–600 and is defined by Wilmington Plain, Wilmington Cord Marked, Walthour Check Stamped, and Walthour Complicated Stamped surface designs. Wilmington II occurred between A.D. 600 and 1000; Wilmington Plain, Wilmington Cord Marked, and Wilmington Brushed ceramics distinguish this subphase of the Late Woodland period. St. Catherines is placed between A.D. 1000 and 1150. DePratter defines this phase by the appearance of the more refined St. Catherines Cord Marked design, burnished plain surfaces, and the rare occurrence of St. Catherines Net Marked wares. However, the lack of radiocarbon evidence from secure contexts may preclude such a refined chronology for the Late Woodland period.

The continuation of earlier Woodland ceramic styles into the Late Woodland, and the overlap of Late Woodland projectile points into the Mississippian period provide few diagnostic materials for the Late Woodland Period at Fort Gordon. Only 34 Late Woodland components were identified at Fort Gordon, while 77 sites are identified as “Woodland/Mississippian” (Joseph et al. 1994:46).

Social, economic, and technological manifestations that are associated with the Mississippian period became established on the lower Coastal Plain and Coast at approximately A.D. 1150. These changes were dramatic, and some have argued that they occurred when the loosely integrated Late Woodland populations in the region were colonized and acculturated by the chiefdom-level societies that had emerged in the Etowah River and Piedmont Oconee River valleys by A.D. 1100 (Anderson et al. 1986).

3.2.4 Mississippian Period (ca. A.D. 1150–1550)

The Mississippian period marks the appearance of chiefdom-level societies in the southeastern United States. Society was stratified; an elite class exerted ascribed and achieved power over the general population. Earthen temple mounds were constructed, and the villages that surrounded these features became political centers where elites resided and ruled. Non-mound settlements became larger and more permanent as territoriality increased and warfare became more prevalent. The central Savannah River region was likely controlled in the Mississippian period by polities centered at the Hollywood and Silver Bluff mound sites² which are located just below the Fall Line in Georgia and South Carolina, respectively (Anderson et al. 1986).

Settlement pattern research in the upper Savannah River area indicates a substantial population during the early Mississippian period through the thirteenth century. Early Mississippian sites are identified by Etowah and Savannah Complicated Stamped, cordmarked and corncob impressed pottery. The central Savannah River area does not appear to have been as thickly settled at this time. The Savannah River Site data indicate a larger Late Woodland population than the Russell Reservoir area, with a reversal of the trend during the Mississippian period (Sassaman et al. 1990), and Benson (2003) reports unequivocally Mississippian components on only 1.4 percent of the sites from Fort Gordon. However, 20 percent of sites on the base contain Late Woodland or Mississippian triangular points (Braley and Price 1991).

A total of 68 Mississippian components were identified at Fort Gordon, although some of the “Woodland/Mississippian” sites are probably attributable to the Mississippian period (Joseph et al. 1994:47). The low incidence of ceramics on Mississippian sites at Fort Gordon complicates the tasks of identifying components. The paucity of ceramics at sites on the base likely reflects the fact that the area was used by small, mobile hunting parties who occupied small, short-term camps where pottery was not used (Braley and Price 1991).

At Fort Gordon, 16 of the 19 Mississippian components were identified by Savannah or Irene phase ceramic motifs. In terms of settlement patterns, Benson (2003) observes that Late Woodland and Mississippian lithic artifacts were typically found further from a water source than were artifacts from earlier time periods. At Fort Gordon most (13 of 14) of the Woodland triangular points were of Coastal Plain chert, whereas the Late Woodland and Mississippian triangulars were more often made of quartz (9 of 13). This use of raw material is reflected by

² The relationship of Hollywood and Silver Bluff is poorly understood. The precise age of Silver Bluff is not known, as the site was destroyed by riverbank erosion by the end of the nineteenth century (Anderson et al. 1986). Therefore, it is not clear if the sites were paired centers within the same polity, or if one replaced the other at some point during the Mississippian period.

recent investigations at a site (9MF155) west of Fort Gordon in McDuffie County, where most of the Mississippian points were made of quartz as well (Price 2003).

At the Savannah River Site, Sassaman et al. (1990) report that a sharp drop in ratio of projectile points to ceramic sherds coincides with the shift from the Woodland to the Mississippian period, which is interpreted as a decrease in sherd discard with an increase in the discard of small triangular points. The area is thought to have been largely abandoned by A.D. 1450, but apparently hunting parties operating from extralocal settlements continued using the area (Anderson 1990b).

In Georgia, archaeological definitions and chronologies concerning the Mississippian period diverge at the Fall Line. Three major cultural expressions—Etowah, Savannah/Wilbanks, and Lamar—are recognized north of the Fall Line, while two primary cultures, Savannah and Irene, have been defined on the Coastal Plain and Coast. In the middle Savannah Valley, early Mississippian occupations are comparable to the Savannah II/III phases further downstream and the Jarrett/Beaverdam phase defined for the upper Savannah. Some researchers place late Wilmington and St. Catherines in the Mississippian period and therefore consider the onset of the Mississippian to have occurred at approximately A.D. 900 instead of A.D. 1150 (Crook 1986). Others consider Wilmington and St. Catherines to be Late Woodland manifestations (e.g., DePratter 1979, 1991; Sassaman et al. 1990).

Arguments for placing the advent of the Mississippian period at A.D. 900 include the discovery of grog-tempered cord-marked pottery and grit-tempered Savannah Check Stamped sherds in what is described as a contemporary community structure complex (Crook 1986:37). Crook also cites evidence from the Bourbon Field site, on Sapelo Island, that St. Catherines and Savannah ceramics were significantly correlated within midden deposits to suggest contemporaneity (Crook 1986:37). The differences in technological attributes, according to Crook (1986:37), are probably functional rather than chronological.

Other evidence suggests that Wilmington and St. Catherines wares are associated with the Late Woodland and were not produced at the same time Savannah pottery was manufactured. St. Catherines pottery has been found in pre-mound features at Johns Mound on St. Catherines Island (Larsen and Thomas 1982). There is no evidence of mixing with the Savannah II assemblage, which was clearly associated with the mound at that site. There is also no conclusive evidence that platform mound building, a hallmark of the Savannah period on the lower Coastal Plain, was practiced by people who produced Wilmington and St. Catherines ceramics.

In addition, the technology used to produce St. Catherines pottery has clear antecedents in the Wilmington phase. Although the design is more refined, St. Catherines Cord Marked wares continued to be tempered with grog, as were the plain and net-marked varieties. With the exception of the rare St. Catherines Net Marked surface design, the repertoire of design elements is essentially the same. By contrast, clear differences exist between ceramics produced just prior to A.D. 1150 (St. Catherines) and those that were manufactured after that date (Savannah). Grog tempering is replaced by grit tempering by A.D. 1150, and check stamping reappears at approximately that time as well.

The archaeological evidence indicating that Wilmington and St. Catherines wares are contemporaneous with Savannah pottery is equivocal. Since the former types cannot be directly associated with Mississippian social and technological manifestations in the region, the stance taken here is that the Mississippian period in the project region began with the onset of the Savannah phase (ca. A.D. 1150).

Savannah (ca. A.D. 1150–1300). Savannah period sites are characterized by platform mounds and/or grit-tempered ceramics that belong to the Savannah series. For example, the Irene site is a Savannah period mound center in Chatham County near the mouth of the Savannah River. The largest mound at Irene consists of eight superimposed construction episodes. The first seven are associated with the Savannah period, and the eighth was constructed during the Irene period. All seven of the Savannah mound summits had at least one structure and/or palisade (Caldwell and McCann 1941:8–18). These structures are thought to have been temples, public buildings, and/or residences for chiefs, priests, and other members of the elite class. Another mound at Irene was used as a burial facility. The burial mound was approximately 16.75 m (55 feet) in diameter and 0.75 m (2.5 feet) high. It consisted of a central shell deposit surrounded by shell layers separated by layers of sand (Caldwell and McCann 1941:22). A total of 106 interments were identified during the 1937–1940 excavations, and although both Savannah and Irene period burials were present, most are attributable to the Savannah occupations (Caldwell and McCann 1941:22).

The Savannah ceramic series consists of Savannah Cord Marked, Savannah Check Stamped, Savannah Complicated Stamped, and Savannah Plain types. Savannah Cord Marked pottery is grit-tempered. Cord marking is usually cross-stamped on these wares; vessel forms include flared-rimmed globular jars and conoidal jars. Savannah Check Stamped vessels are tempered with sand or grit. Flared-rimmed globular jars, conoidal jars, and hemispherical bowls are the most common forms. Savannah Complicated Stamped ceramics exhibit a variety of surface designs. The most common motifs are diamond, barred-diamond, double-barred circle, double-barred oval, figure eight, figure nine, and concentric circle. Savannah Complicated Stamped pottery is also tempered with sand or grit; the common form is the flared-rimmed globular jar.

Savannah Plain wares are usually burnished. They have a sand or grit temper and were produced in a variety of forms. Vessel shapes include carinated bowls, shallow bowls, and hemispherical bowls with outflaring rims; cup-shaped and boat-shaped forms also occur (Caldwell and McCann 1941:46).

Temporal differences in ceramic technology and decoration have long been noted within the Savannah period, and several Savannah sequence chronologies have been proposed (Anderson et al. 1986; Caldwell 1971; DePratter 1979; Braley 1990; Crook 1990). This report follows the sequence proposed by Braley (1990) and recognizes two phases: Savannah I and Savannah II. Savannah I (ca. A.D. 1150–1200) is defined by large jars with check-stamped surfaces, vessels with cord-marked surfaces, and carinated bowls with plain surfaces. Check-stamped wares and carinated bowls with plain surfaces also occur during Savannah II (ca. A.D. 1200–1300); large complicated-stamped jars and vessels with noded rims distinguish Savannah II from Savannah I.

Other media associated with Savannah period material cultural include chipped stone, polished stone, shell, bone, and copper. The vast majority of hafted bifaces are small triangular projectile points that presumably functioned as arrowheads and dart points. Various utilitarian items were manufactured from stone, bone, and shell.

An elaborate material culture associated with ideological and religious beliefs and practices also existed. These items, part of the Southeastern Ceremonial Complex, were used symbolically to obtain, maintain, and sanction chiefly and priestly power and status. Goods associated with the Southeastern Ceremonial Complex include embossed copper plates and cutouts, monolithic polished stone axes, shell gorgets, stone statues, carved slate palettes, and pins made of shell or copper.

In terms of settlement organization, local mound centers such as Irene or Hollywood formed the center of political power. These villages were permanently occupied by the ruling elite and a resident population. As political control waxed and waned among elite factions in this politically turbulent era, mound centers were periodically constructed, maintained, and abandoned (Anderson 1990b). Many mound centers were abandoned and then reoccupied several times.

Large permanent villages that were not associated with mounds were also established during the Savannah period, usually along major rivers. These places were probably inhabited by elites who were subordinate to those residing at the mound centers. A resident population of commoners is also assumed.

Small hamlets and homesteads were established as well. In addition to sustaining themselves and their families, residents of these locations likely provided villages with food and other important resources as tribute, in return for protection and inclusion in the political system.

Hunting, gathering, and fishing were still very important to the Savannah period subsistence economy. Maize, beans, and squash were cultivated during that era, but it appears that horticulture was more important in the upper Coastal Plain and Piedmont than on the Coast. The production and distribution of cultivated foods may have been controlled by the elite as part of their efforts to acquire and maintain power (Anderson 1990b).

Irene (ca. A.D. 1300–1450). The Irene period is associated with political instability and dramatic demographic shifts. Archaeological manifestations of the Irene period include earthen mound construction and specific pottery types that belong to the Irene ceramic sequence.

During the Savannah period, political authority appears to have remained relatively stable. Central authority seems to have begun to break down by A.D. 1300, however, and fortified villages became common. This suggests that warfare between polities was an integral part of the political landscape at that time, and it probably erupted over such important issues as the control of trade routes, agricultural land, and hunting territories (Anderson 1990b; Anderson and Joseph 1988:316; Anderson and Schuldenrein 1985; Larson 1972).

By ca. A.D. 1350, some mound centers—Hollywood and Irene, for example—were abandoned, and the regional population may have declined considerably (Anderson 1990b:483). It is also

possible that this apparent population decrease may actually represent population dispersal. Small Irene period sites are known to have been established in the region by approximately A.D. 1340 (e.g., Stanyard 1993).

Irene period mounds were circular and relatively large and exhibited rounded summits, rather than the flat summits associated with the platform mounds of the Savannah period (Caldwell and McCann 1941:18–20). Burials occur in the mounds, but the presence of structures on the summits suggests that the mounds were also used for ceremonial purposes and/or as residences for the elite. At Irene, the summit structures appear to have been significant, as wall trenches, fired wall plaster, and daub were discovered in association with Mound 8. Mound 8 was the final mound building episode at the large mound, and the only one of the eight episodes associated with the Irene period occupation.

As discussed earlier, the burial mound at Irene was used during both the Savannah and Irene occupations, but the majority of interments are from the Savannah period. The mortuary, however, appears to be exclusively associated with the Irene period inhabitants. This structure consisted of wall posts arranged as a square with rounded corners; each wall was approximately 7.3 m (24 feet) long. The walls were apparently plastered, and it may have had a palmetto thatchroof (Caldwell and McCann 1941:25).

Two concentric walls, or palisades, surrounded the main structure. They are thought to have demarcated the boundary of the Irene period cemetery created after the mortuary was destroyed by a fire, which may have been intentionally set (Caldwell and McCann 1941:25, 27–28).

Irene series ceramics include Irene Plain, Irene Incised, and Irene Complicated Stamped types. Irene Plain vessels are tempered with grit and may exhibit rims with nodes, punctations, rosettes, or appliqué strips. The most common form is the hemispherical bowl; rims may be straight, slightly incurving, or slightly outflaring.

Irene Incised pottery is also tempered with grit. Motifs consist of parallel lines arranged in patterns of straight lines, curves, and right angles. The incising technique varies from precise to careless. Designs are usually placed just below the rim or at the collar; nodes may also be present. The most common vessel form is the flat-bottomed hemispherical bowl. Rims are usually incurving, but the carination is rounded rather than angular. Incised globular jars with outflaring rims are rare (Caldwell and McCann 1941:48).

Irene Complicated Stamped wares are also tempered with grit. The most popular designs are variations in the filfoot cross motif. Nodes, punctations, rosettes, and appliqué strips are commonly found on this vessel type. The most common forms exhibiting Irene Complicated Stamped designs are hemispherical bowls with incurved or straight rims and globular jars with outflaring or straight rims.

Small triangular arrowheads and dart points manufactured from chipped stone continued to be produced during the Irene period. Utilitarian, decorative, and ceremonial items were produced from polished stone, bone, and shell, but the importance of items specifically associated with the Southeastern Ceremonial Complex apparently diminished in this era.

Based on investigations at Harris Neck, an Irene period site in McIntosh County, Georgia (Braley et al. 1986), Braley (1990) has defined two phases of the Irene period: Irene I and Irene II. Irene I (ca. A.D. 1300–1350) is characterized by large jars with plain surfaces and by reed punctated and noded rims. Irene II dates to ca. A.D. 1350–1450; large jars with appliqué and segmented rim strips were produced in this era, as were small jars with simple scroll designs. Carinated bowls also occur in assemblages of this age. They exhibit various straight-lined, curved, and angular designs consisting of two or three incised parallel lines (Braley 1990).

Identified ceramic types for Irene phases are not well established chronologically. Irene Diamond Check Stamped appears to represent a transition from Savannah to Irene I, while Irene Check Stamped, Irene Burnished Plain, Irene Filfot Stamped, Irene Incised, and Irene Complicated Stamped seem to have been present during both Irene I and Irene II (Williams and Thompson 1999:56–59).

Little is known about Irene period settlement, and the following description is based on evidence derived from ethnohistorical accounts of contact period groups (Guale) in the region (Crook 1978; DePratter 1984; Larson 1980). It is therefore possible that Irene settlement patterns had been sufficiently altered by European contact to distort the perspective obtained from the early Spanish accounts.

Based on the available archaeological and ethnohistorical data, it is thought that the large mound centers were permanently occupied by paramount chiefs and their families; a resident population of non-elites protected and maintained the village. Large surrounding villages are postulated to have been permanent residences for subordinate chiefs, their families, and a contingent of non-elites. Small single-family farmsteads may have been established in outlying areas, perhaps to tend small fields cultivated with corn, beans, and squash. Seasonal camps likely took advantage of seasonally available resources—nuts and fish, for example—at the appropriate time of year.

Horticulture was probably practiced during the Irene period, but the degree to which corn, beans, and squash contributed to the diet in the project region is unclear (Crook 1978, 1986; DePratter 1984; Larson 1980). It appears that hunting, gathering, and fishing remained an important part of the subsistence economy.

Post Irene (A.D. 1450–1540). Very little is known about social and technological developments in the project area between A.D. 1450 and 1540. The project area may have been essentially depopulated by A.D. 1450 (see Anderson 1990b:618–620) and could have been part of a buffer zone between the politically powerful polities of Ocute and Cofitachequi.

Braley (1990) defined the Pine Harbor (A.D. 1450–1575) and Altamaha/Sutherland Bluff (A.D. 1575–1700) phases for coastal Georgia. Pine Harbor traits include: reed-punctated, appliqué rim strips on large jars; intricate incising on small jars; bold incising; punctuation, and cazuelas with multiple-line incising. The Altamaha/Sutherland Bluff phase is linked with Guale populations and its traits include: large jars with wide folded rims, reed-punctated rims, rectilinear complicated stamping, or cross-simple stamping; small jars with fine incising, red filming, or punctations; and cazuelas with narrow or broad incising or punctations (Braley 1990).

3.3 HISTORY OF EASTERN GEORGIA IN THE VICINITY OF FORT GORDON

The first Europeans to arrive in Georgia were the Spanish, who established missions and forts along the Georgia coast during the second half of the sixteenth century (Coleman 1977:9–10). Although permanent settlements were confined to coastal areas, the Spanish carried on extensive trade with interior tribes. Of the several expeditions that explored the interior, the most important was the De Soto expedition of 1540 (Hudson et al. 1984:71–72). De Soto and his men, traveling from the town of Cofaqui on the Oconee River east to Cofotachequi on the Saluda River north of what is now Columbia, South Carolina, likely passed through the area that is now Fort Gordon. The party is believed to have crossed the Savannah near the site of Augusta. De Soto's expedition found no villages along this route, which appears to have been a buffer region between competing tribes of Native Americans at that time. A few other Spanish expeditions penetrated the interior of Georgia after De Soto, but actual contact with interior tribes was rare in the seventeenth century. Nevertheless, disruptions caused by the European presence on the continent (war, introduction of trade goods, disease, enslavement) altered the native cultures. By the mid-seventeenth century, two major Native American groups inhabited Georgia: the Cherokee and the Creek, with the Creeks generally controlling the area south of the Chattahoochee River.

In the late seventeenth and early eighteenth centuries, Georgia was a battleground of competing forces as the European colonists fought for influence among the Creek and Cherokee in Georgia. British traders penetrated the Cherokee territory from the Carolinas and Virginia, while Spanish set up missions along the Georgia coast. By the late 1600s, however, Spanish power in what is now Georgia had begun to wane. Incursions against the Creek along the Chattahoochee pushed them eastward, closer to the British influence, and the British exerted steady pressure on the missions of the coast until the Spanish could no longer maintain them (Spalding 1977:12–13).

Hoping to establish a barrier colony between the Carolinas and Spanish Florida, the British crown granted a charter to James Oglethorpe, and in 1733 he launched his Georgia colony at Savannah. The Indian trade provided an immediate source of income, and in 1736, Oglethorpe authorized a fort to be placed on the Georgia side of the Savannah River just south of present day Augusta. This was already a well-established gathering place for traders and customers who met at the Savannah River fall line to transport their goods to the coast. A Shawnee settlement named Savannah Town was founded on the South Carolina side of the river before the end of the seventeenth century (later Fort Moore). Fort Augusta, located at the head of navigation on the Georgia side of the river, was completed in 1738 and became a focal point for traders and tribes throughout the Southeast (Callahan 1980:17). It became one of the greatest fur trading centers in the Southern colonies, hosting up to 600 traders with 2,200 horses carrying skins at the height of the trading season (Coulter 1947:62).

By the early 1750s, Fort Augusta was abandoned and falling into disrepair. The fort was reoccupied six years later, during the French and Indian War, after the townspeople petitioned

the royal government for protection. At the close of the French and Indian War, the demand for western lands increased dramatically. The colonial government held a conference in Augusta that was attended by over 700 representatives of five Indian nations and four royal governors (Coulter 1947:91–92). Treaties were established with Native Americans in 1763 and 1773 that made lands available to Euro-American settlers from the Savannah River west to the Ogeechee River.

The newly acquired area became known as the “ceded lands” (Callahan 1980:15–17). Yeoman farmers from the Carolinas and Virginia began moving into this territory in large numbers, and by the start of the American Revolution, the majority of Georgia’s population lived outside the coastal region. At the close of the Revolutionary War, Savannah became the state capitol, but because of the growing importance of the upcountry region, the governor and his council resided part-time in Augusta and the assembly alternated sessions between the two cities (Coleman 1977:91).

Early settlers in the area that is now Fort Gordon practiced subsistence farming and produced crops such as corn, wheat, rye, fruit, and vegetables. Corn was grown throughout Georgia and was the backbone of the state’s agricultural regime, providing food for the family and livestock, with some left over for barter or sale. Like the Native Americans, they favored settlement along the creek and river bottoms. Lands already cleared by the previous inhabitants were among the first to be settled. Less desirable lands were soon taken up as well, however. Streams were dammed for the purpose of constructing water-powered sawmills. The timber adjacent to these millponds was harvested and transported to the mills to be sawn into lumber. When the area surrounding the streams was cut out, the loggers moved to the next drainage and the process was repeated. Most of the land that had been cleared of timber was converted to agricultural production.

As the number of settlers in an area increased, new roads were cleared to facilitate commerce and communication. Road construction improved access to distant markets and thus encouraged production of cash crops such as cotton and tobacco. Small communities developed at crossroad centers to serve the needs of the agricultural population. These communities might contain no more than a store, but often included a post office, church, mill complex, and possibly a cotton gin. The residents of these communities were generally linked by common churches and schools, as well as kinship ties. Trips to the county seats were necessary to attend to county business such as land transfers and court appearances.

Beginning in the 1790s the cotton gin dramatically increased the profitability of short staple cotton production and as a result shifted the agricultural regime of the Fort Gordon area. As the main shipping point to Savannah, Augusta prospered in the late eighteenth and early nineteenth centuries. The continuous expansion of Georgia’s territory and the phenomenal profitability of cotton production contributed to a highly mobile frontier community. The frequent availability of cheap land further west lured many farmers into picking up stakes and moving whenever they saw greener pastures.

Farmers of moderate means, working only with their family or a few slaves on 100 acres or less, often grew cotton as a supplement to their food crops and livestock. Although some were unable

to subsist and drifted into tenancy, many were able to maintain a decent living. Although very large planters made up a small portion of farmers, much of the land and most of the slaves were held by this small minority. These plantations were often communities in themselves, and the slaves who worked on them were often employed in all manner of tasks from planting and picking to small-scale manufacturing and household chores (Coleman 1977b:163–165).

Improved transportation in the form of railroads, beginning in the 1830s, further supported the plantation system by providing easily accessible markets for cash crops. In 1834, the Charleston and Hamburg Railroad brought rail service to Savannah River across from Augusta. Cotton farmers in the upcountry quickly sought to connect to the line and chartered the Georgia Railroad Company to extend the line from Augusta to Athens.

The lower Piedmont of Georgia, around the Fall Line, was the center of the cotton-growing region of Georgia. It was here that the largest plantations were found, as well as the largest populations of African-American slaves. By 1850, slaves represented nearly half of the total population in Richmond and Jefferson counties, and nearly 70 percent in Columbia County, which includes the area that is part of Fort Gordon today (Bode and Ginter 1986:74–83; DeBow 1990).

Despite the large plantations of the surrounding countryside, the Augusta community was reluctant to join the secessionist movement in the 1850s for fear that it would disrupt the prosperous economy. Eventually secessionists prevailed, however, and on January 19, 1861, Georgia became the fifth southern state to secede. Augusta played an important role in the Civil War as the site of the main Confederate Arsenal and a rich agricultural hinterland. On his march to the sea, General William T. Sherman bypassed Augusta in favor of Savannah, offending some of its residents; however, the city fared better than most major southern cities during the war, and therefore had a head start in the post-war reconstruction (Callahan 1980:53).

After the Civil War, the newly freed African-American population in the South was incorporated into the agricultural economy as tenants under various contract arrangements, most commonly as sharecroppers. In this system, the tenant received a percentage share of the crops in exchange for providing the labor, with the landlord providing the land and most of the equipment necessary to produce the crop. In 1880, about 40 percent of Richmond County farmers were tenants (U.S. Bureau of the Census 1913). Tenancy, with an emphasis on cotton production, persisted in Richmond County and the surrounding region until the boll weevil, the Depression, and New Deal programs combined to break the cotton economy in the 1920s and 1930s.

Many tenants, unable to make it in farming in the late nineteenth and early twentieth centuries, began migrating to Augusta, which became increasingly industrialized with cotton mills and other industries during this period (Coulter 1947:408). The gradual abandonment of farmlands lowered land prices, and during the early twentieth century, land in the Fort Gordon area began to attract families from Augusta, who constructed summer residences and clubhouses near the many existing millponds for recreational and leisure purposes. Also during this period, Georgia Vitrified Clay and Brick Company purchased several hundred acres of what is now Fort Gordon as a source of clay for manufacturing bricks. Currently, Georgia Vitrified Clay and Brick maintains mineral rights on approximately 96 acres in Training Area 35. However, the main

land-use focus of what was to become Fort Gordon was agricultural production until the purchase of the property by the War Department in 1941.

The planning and development of military facilities prior to America's entrance into World War II brought relief from the Depression in the form of government funds for construction expenditures, commodity purchases, and payrolls (Coulter 1947:438–440). The Army Air Corps opened a base at Daniel Field in December of 1940. The following spring, plans were announced for the construction of Fort Gordon. The new fort was under construction when the Japanese bombed Pearl Harbor (Callahan 1980:155).

3.4 HISTORY OF FORT GORDON

Fort Gordon was originally known as Camp Gordon. The original Camp Gordon was formed in Chamblee, Georgia, but after World War I, Camp Gordon was sold as surplus. Camp Gordon's next incarnation was in 1941 in the sand hills west of Augusta, Georgia. The camp became a permanent installation in 1956 and the name was changed to Fort Gordon. The boundaries of the reservation encompass approximately 55,000 acres in four counties (Braley and Price 1991:24).

The installation experienced a number of periods of growth (Figure 3.2). In 1939, the war in Europe led to an increase in military spending in the United States, and the mobilization of personnel created overcrowding at existing Army bases. Business and political leaders in Augusta began to lobby for a military training facility at that time, and in May 1941, the Army announced its plans for a training camp for triangular infantry divisions, armored divisions, and anti-aircraft units at a site west of Augusta. A 60,000-acre area was delineated, with approximately 40,000 acres incorporated in the first acquisition. The camp as planned was to include 2,000 buildings and was to support 35,000–40,000 personnel. Site preparation for the facility began in May 1941, and the first buildings were constructed in August. The Japanese attack on Pearl Harbor in December 1941 added urgency to the base's mission. The temporary headquarters set up in the post office building in Augusta were moved to Building 2050, the first on the base to be completed. Although the camp was not ready for occupation, the 4th Infantry Division arrived just before Christmas 1941 for training (Swanson et al. 1995:14, 17).

Construction continued into 1942 and the original plans were expanded to almost double the size of the camp. Five hundred additional buildings were to be constructed within two months. The camp was laid out with the administrative facilities, housing, and support facilities located in the main cantonment at the northeast end of the site, closest to Augusta, and the training areas and firing ranges extending away from the main cantonment toward the southwest. Within the main cantonment, barracks for enlisted personnel were laid out on the north and south sides of the parade ground, near the center of the site. Administrative and headquarters buildings were located at the east end of the parade grounds and recreational and social areas were on the west end. A separate set of barracks for attached units extended from the southeast corner of the parade grounds. The hospital was located away from the barracks on the east side of the cantonment. Officers' housing was also located away from the center of the cantonment, around Boardman's Lake. The far western end of the cantonment generally housed those functions that

were to be away from the public eye. Industrial facilities such as railroads, warehouses, and fuel storage were located in the northwest part of the cantonment. Separate facilities were constructed for African-American soldiers in the southwest end of the cantonment, separated from the main parade ground and administrative facilities. Between the industrial area and the African-American barracks were the stockade and a prisoner of war camp. Most of the buildings constructed during the World War II era were of temporary frame construction and used plans from the 700 and 800 series of temporary structures then in use by the United States Army (Joseph et al. 1994:138, 145; Swanson et al. 1995:14, 46).

Although a semi-permanent home for the troops who received their training there, Camp Gordon functioned as a fully self-contained city. Theaters, libraries, a newspaper, and recreational facilities provided entertainment, while mess halls, garages, barbershops, stores, a laundry, and more, provided support. The 4th Infantry Division was deployed to Europe in 1943 and was one of the principal units involved in the D-Day invasion of June 1944. The 26th Infantry Division, which shipped off to the European Theater in August 1944, also trained at Camp Gordon. Many other smaller units trained or were garrisoned at Camp Gordon during World War II, including ordnance, quartermaster, field artillery, engineer, chemical, signal, ambulance, and medical units. The prisoner of war camp at Camp Gordon housed an average of 2,000 Axis soldiers from 1943 to 1945. The prisoners were assigned to tasks on the base and were later employed in civilian jobs such as agricultural work and timber harvesting. The prisoners were moved to Daniel Field, about 10 miles northeast of Camp Gordon. In 1944, a Replacement Training Center was established at Camp Gordon, but it was deactivated with the end of the war in November 1944 (Joseph et al. 1994:149–150).

The fate of Camp Gordon was uncertain for several years following the war, but it served several purposes during the interim. Immediately after the war it was used as a Separation Center, designed to help soldiers return to civilian life. The Separation Center and hospital closed in 1946, but a portion of the camp continued to be used as an incarceration facility for military personnel serving sentences of less than five years. These barracks, located in the western part of the cantonment, were used until 1949. Meanwhile, the intensification of the Cold War made it clear that a permanent military presence was needed and Camp Gordon was considered a good candidate for permanent status. In 1948, the Signal Corps, the communications center of the Army, moved their training school to Camp Gordon, as did the Military Police. The Military Police School, renamed the Provost Marshal General School in 1950, was a part of the base until 1975, and the Signal Corps, now the U.S. Army Signal center, still forms the center of Fort Gordon's mission (Coker 1992:68–74).

During the Korean Conflict, Camp Gordon once again served as a basic training school for infantry, as well as for the signal corps and military police that had moved there in 1948. Other training schools were added, including an anti-aircraft artillery school and a pilot rehabilitation training center. The specialized schools were integrated into the combat training for soldiers arriving at Camp Gordon, and the signal corps and military police training centers expanded during this time. The Women's Army Corps (WACs) also received training at Camp Gordon during the Korean Conflict. Camp Gordon continued to utilize the temporary buildings constructed during World War II, adding some barracks and support buildings to accommodate the increased personnel. When hostilities began winding down in 1953 and troops were

returning home, Camp Gordon once again served as a separation center (Joseph et al. 1994:151).

It was not until 1956 that Camp Gordon was afforded permanent status and its name changed to Fort Gordon. Cold War tensions continued through the late 1950s, and the army recognized the role of specialized training in the new military. The presence of more permanent staff required the construction of more permanent housing and more housing for married personnel. In 1956, funds were approved for a number of new quarters. The Service Club No. 1 was renovated in 1957. A Noncommissioned Officer Academy was also established in the late 1950s (Joseph et al. 1994:152).

The basic training facility that was revived briefly in 1957, only to be closed again in 1958, was reopened in 1961 as the U.S. Army Training Center. Few other physical or organizational changes took place at Fort Gordon until the mid 1960s, when a physical transformation began that finally converted the base from a temporary camp to a permanent military installation, nearly 10 years after its designation as such. Throughout the next 15 years, the wooden frame barracks and other buildings from the World War II era were torn down and replaced by brick, concrete, and steel structures. Beginning in 1970, the old hospital buildings were replaced with a modern medical facility designated Dwight David Eisenhower Army Hospital upon completion. All new facilities were constructed as well, including arms range complexes, service clubs, and religious, recreational, support, and headquarters buildings. In the training areas, replica Vietnamese villages and other re-creations were built for training exercises. World War II era structures remained only in the southwest part of the cantonment where the African-American housing was located in World War II, in the warehouse area, in the headquarters area at the eastern end of the parade ground, and along the northeastern side of Brainard Avenue in the southeastern leg. Four houses around Boardman's Lake that pre-date the construction of the base were converted to officer housing and are still standing. Two other houses at Boardman Lake were constructed during World War II (Joseph 1994:55–56, 152–153, 159; Swanson et al. 1995:18–19).

Fort Gordon was established as the site for all Signal Corps training in 1974, and the units at Fort Monmouth, New Jersey were transferred to Georgia. At that time, Fort Gordon was renamed the U.S. Army Signal Center and Fort Gordon and was designated the Home of the Signal Corps. The Signal Corps Museum is also now located at Fort Gordon. After the intensive building program of the late 1960s and 1970s, few new structures were added during the 1980s. New barracks were constructed south of Brainard Avenue, educational buildings were added on Chamberlain Avenue at 25th Street, and a new lab was added in the southwest part of the cantonment (Swanson et al. 1995:18–21).

One of the consequences of construction within the cantonment area over the past half century is the disturbance it has caused to archaeological sites that may have existed there. During the development of the cantonment area, the natural topography was altered, leveled out, and otherwise disturbed through construction. Infilling and massive excavations occurred probably without much consideration of prehistoric or historic materials.

4.0 CULTURAL RESOURCES INVENTORY

This section provides an overview of disclosure issues regarding archaeological resources and an inventory schedule for NHPA undertakings at Fort Gordon. This section also provides an overview of planned undertakings and compliance objectives for the next five years.

4.1 DISCLOSURE GUIDELINES FOR ARCHAEOLOGICAL RESOURCES, TRADITIONAL CULTURAL PROPERTIES, AND SACRED SITES

As a protective measure, specific location information for archaeological resources and traditional cultural properties should not be disclosed except on a strict “need to know” basis. This protection of site information is directed by a variety of federal regulations, including NHPA Section 304, ARPA Section 9, and EO 13007 Section 1, as presented in Section 2, *Statutes and Regulations*, of this document. Such location information is obviously necessary in establishing buffer zones and off-limit areas around sites requiring such protection, but the reasons for the existence of these areas need not be disclosed.

4.2 CULTURAL RESOURCES INVENTORY SCHEDULE

Cultural resource inventory of archaeological sites has been completed for Fort Gordon, with the exception of areas that have been heavily disturbed on the cantonment, areas with unexploded ordnance in the Training Area, areas currently submerged by lakes and ponds (although Boardman Lake has been surveyed in 1991 following a dam break in 1990), and 119 acres located in training area 23 and 1. A historic architectural inventory has been completed that evaluates buildings and structures dating from 1942 to 1989. Additional architectural or archaeological inventory-level investigations are not expected during the next five years. However if the installation acquires additional acreage or plans undertakings that require Section 106 compliance for areas not previously surveyed (e.g., mill ponds become drained and construction in the vicinity of these areas is planned, or construction within the cantonment area where previous impacts may have been limited is planned) or that impact historic homesites that still maintain visible integrity causing a discrepancy in the Phase I survey recommendation.

4.3 ACTIONS THAT MAY IMPACT CULTURAL RESOURCE MANAGEMENT

4.3.1 NEPA Actions and NHPA Undertakings

The NEPA review process cannot be substituted for the requirements stipulated in NHPA Section 106, which calls for review and consultation on all undertakings that may affect cultural resources (including those that are categorically excluded from NEPA review). Currently, the NEPA Coordinator in the ED/NRB serves as the CRM for Fort Gordon and reviews major undertakings through the process laid out in the Section 106 Programmatic Agreement with the GA SHPO.

It is not expected that any of the undertakings planned at Fort Gordon during the next five years will adversely affect cultural resources. However all undertakings that have the potential for affecting cultural resources are reviewed by the CRM in accordance with the Section 106 PA with the GA SHPO finalized in 2006. If it turns out an undertaking will adversely affect a cultural resource the GA SHPO and appropriate interested parties will be consulted as is laid out in Stipulation V of the PA.

4.3.2 Military Training Actions

At the present time, no conflicts exist between the accomplishment of the Fort Gordon military mission and the management of cultural resources on the installation. Historic and prehistoric sites that have been identified and determined eligible or potentially eligible for the NRHP should continue to be protected from ground disturbance. Currently, such areas are marked as environmentally sensitive on base training maps, and training activities are restricted in those areas. Archaeological sites that are determined as not eligible for listing on the NRHP require no further protective measures. The forty-five family cemeteries that are maintained on Fort Gordon are also included on training maps and are limited to pedestrian traffic only. Currently, the only National Register eligible building on Fort Gordon is Woodward Library. This building is considered eligible based on the GA SHPO's recommendation that this building has exceptional architectural significance.

As long as the process laid out in SOP #2 continues to be completed in a timely manner for future undertakings, there should be no conflict between cultural resources management and the accomplishment of the military mission. As noted previously, the CRM reviews each proposed action at Fort Gordon to assess its potential impact to cultural resources and cemeteries.

4.3.3 ARPA Violations

At present, malicious destruction of archaeological sites or theft of artifacts does not appear to be a serious threat at Fort Gordon. In most cases, education is the best tool to prevent ARPA violations. ED/NRB personnel currently understand the necessity of protecting archaeological

resources, and it is important that commanders overseeing training understand the need to restrict activities in areas marked as environmentally sensitive. In certain locations such as training areas, it may be advantageous to visibly mark areas that are off-limits to ground-disturbing activities with signage, flagging, or some other appropriate method. Incorporation of fencing around sensitive areas, such as cemeteries, will also assist in the protection of potentially eligible sites.

4.3.4 Potential Threats to Archaeological Resources

The most serious threats to archaeological resources at Fort Gordon are training and maintenance activities that require ground disturbance, such as weapons firing, road and culvert construction, and off-road vehicle use. These activities have the potential to adversely affect the integrity and content of known or unknown sites through ground disturbance and/or pedestrian activity. The completion of EAs and compliance with the Section 106 consultation process can effectively mitigate these potential threats. Natural forces do not currently pose a threat to the archaeological resources at Fort Gordon except for mill sites, which may be damaged by flooding episodes.

4.3.4 NAGPRA Compliance

The CRM must ensure that an accurate and up-to-date inventory for discoveries of Native American human remains, funerary objects, and/or sacred objects is maintained. All remains and/or cultural items affiliated with Federally-recognized tribes must be repatriated under NAGPRA guidelines. The Installation Commander must initiate all consultation with Native American groups as may be warranted. Additional information on activities related to NAGPRA and tribal coordination, as they apply to Fort Gordon, is provided in Section 5, *Management Plan*.

A NAGPRA Section 6 summary of the Fort Gordon archaeological collection was completed in 1995. The report concluded that there were no skeletal remains or funerary objects within the collection. Items collected from excavations, completed after this report, have not been identified to contain skeletal remains or funerary objects that fall under NAGPRA.

To facilitate Indian consultation, Fort Gordon should pursue a CA with the relevant Federally-recognized Indian tribes, in accordance with NAGPRA.

4.3.5 Document Management

Copies of all documents pertaining to cultural resources management at Fort Gordon must be kept on file. These documents include, but are not limited to, correspondence, published and unpublished technical reports, annual compliance reports, maps, site records, and lists of properties. Also copies of archaeological survey reports are maintained in archival boxes at the off-site curation facility at the University of Georgia, Riverbend Research Curation Facility. The

CRM must report the status of cultural resources compliance, as requested, to the Installation Commander, the GA-SHPO, and the ACHP.

4.3 PLANNED UNDERTAKINGS FOR NEXT FIVE YEARS

A number of construction projects are planned on the installation to help further Fort Gordon's mission over the next five years (Figure 4.1). The list of proposed projects in the Real Property Master Plan (RPMP) was checked and projects that were either previously completed or would not require consideration of cultural resources are excluded from this discussion.

The following information cannot be assumed to be complete, as there is always the potential for military missions to change. Planned projects include:

- Renovate Rolling Pin Barracks and associated headquarters and dining facilities (35 buildings), FY07-15
- Barracks Upgrade Program (8 buildings)
- AIT Barracks Complex, Phase I FY09
- Convert Overhead Utilities to Underground and Installation of New Street Lighting, Estimated Completion for Cantonment is 2013
- Youth Services Center and 3 Child Development Centers, FY09
- Recreational and Support Facilities at Gordon Lakes Golf Course and Leitner Recreation Area
- Signal School Classroom Renovations
- Force Protection Measures (berms, bollards, fencing, etc) in Cantonment
- Expansion and New Training Facilities at "Sim City"
- Range Refurbishments
- Multipurpose Machine Gun Range, FY13
- Drop Zone Relocation, FY09-10
- Construction of New Library

Most of the planned work will take place in areas with no previously identified cultural resources. However, two projects on this list will have the potential to affect historic properties. The Drop Zone Relocation project footprint includes two family cemeteries. The second project that will have an impact to historic resources is the construction of a new library. The planning process for the new library will include any future uses of the existing library, Building 33500, which is eligible for the NRHP. These three projects will be continually reviewed through the planning process. SOP #2, Section 106 Compliance, will be followed if historic properties are adversely affected.

Should any other projects take place in the locus of sites determined to be potentially eligible or eligible for the NRHP, evaluative (Phase II) testing to determine the site's NRHP eligibility will be required. For eligible sites, Phase III data recovery excavations may be required. Furthermore, any design upgrade or demolition that will alter the fabric or integrity of an eligible historic structure may require an architectural documentation, in accordance with HABS/HAER specifications.

4.4 ACCOMPLISHMENTS OVER THE LAST FIVE YEARS

- Development and Implementation of a Programmatic Agreement (PA): In 2006 a PA was signed between Fort Gordon and the GA SHPO to streamline the Section 106 consultation process. The PA allows Fort Gordon cultural resource staff to internally review most undertakings occurring on the installation for impacts to cultural resources. Projects requiring external review include those that will adversely affect historic properties. In order to track the CRMP's compliance with the PA, a database was created documenting the projects reviewed over the course of each calendar year. The information tracked in this database is used in the annual compliance report submitted to the GA SHPO.
- Consultation with Federally Recognized Tribes: A cultural affiliation study was completed in 2007 identifying Federally recognized Tribes historically associated with the land occupied by Fort Gordon. Following completion of this study, the recommended 10 tribes were contacted and Fort Gordon's first Tribal consultation meeting was held November 2007. The meeting included an overview of the Cultural Resource program as well as a discussion of activities occurring on Fort Gordon that could impact resources significant to the Tribes.
- Survey of "Unknown" Eligibility Archaeological Sites: In 2008, a Phase I was conducted to test 22 previously identified sites that did not have a determination of eligibility to the NRHP. These 22 sites were among 88 sites originally identified during the 1981 Archaeological Investigation conducted by New World Research. The other 66 sites had been resurveyed and given NRHP determinations through the Timber Harvest Phase I surveys conducted in the early 1990s. None of the 22 sites that were a part of the 2008 survey were determined eligible, though one of the sites was combined with 9RI374 (eligible) as they are spatially related with each other. This survey eliminated all remaining "unknown" determination sites on Fort Gordon.
- Survey of Historic Buildings: Three architectural surveys, a survey of the Boardman Lake Residences, buildings built between 1942-56, and a Cold War era survey for buildings built through 1989, were completed in 2005. While the first two surveys listed recommended no buildings as eligible for the NRHP, the Cold War survey suggests that 42 buildings, including the Signal School complex, need to be reevaluated when they reach 50 years old. Building 33500, Woodworth Library, built in 1966 and surveyed as part of the Cold War building survey is considered eligible for the NRHP based on the GA SHPO's recommendation. Overall these surveys provide the tools needed to manage the majority of the building inventory, for its historic significance, on the installation.
- Creation of Cultural Resource Spatial Information: Geographic Information System (GIS) data layers have been created containing the location and attribute information for all cultural resources identified during previous survey efforts. This information is

maintained and used almost daily. Edits to the layers are done as new surveys are completed. In order to collect all data pertinent to the CRMP, a survey documenting the Global Positioning System (GPS) location of all managed cemeteries and marked graves was completed. The combination of all this spatial data allows CRMP staff to better review project impacts to protected cultural resources.

- **Participation in Outreach Activities:** The CRMP has expanded its outreach actions over the past five years. Information on the program and types of resources managed on Fort Gordon has been presented through the addition of a website and a pamphlet. CR staff has presented at two professional conferences and co-authored a journal article both on the historic mills sites on Fort Gordon. Also for the last two years, CR staff has participated in Augusta Archaeology Day, which is put on by the Augusta History Museum annually as part of archaeology month.

4.5 FIVE YEAR WORKPLAN

Section 106 Compliance:

The CRMP program reviews Section 106 undertakings in accordance with a PA between Fort Gordon and the GA SHPO. Undertakings involving ground disturbance and impacts to historic buildings need to continue to be reviewed by CR staff to determine affects to cultural resources. The results on these reviews should continue to be tracked in the appropriate established database. The five years covered under the PA will expire December 31, 2010 and this agreement will need to be reviewed, updated, and approved by all parties involved.

Archaeological Inventory and Evaluation:

Three actions should be pursued with regard to the inventory of archaeological sites on the installation. The first action should be to complete a Phase I survey of 119 acres in training area 23 and 1, that were left out of previous survey coverage of the installation. The second action would be to evaluate the eligibility of those sites that are currently determined potentially eligible for the NRHP. These sites would require testing at the Phase II level to make a determination of their eligibility. The third action would be to survey historic homesites, originally surveyed between 1990-93, that still retain their integrity. As archaeological research trends have placed more emphasis on historic homesites there is a need to take a second look at some of these sites.

Architectural Evaluation:

The Signal School Headquarters and Classroom campus should be evaluated as a district for eligibility to the NRHP. This complex of seventeen buildings has build dates ranging from 1966-1973. Construction of the Signal School campus begun in October 1964 as the Army was putting greater emphasis on growing the Signal mission at Fort Gordon under the Southeastern Signal School. As a district, the buildings in this complex have the potential to be eligible to the NRHP under both criteria A and C.

Consultation with Federally Recognized Tribes to Develop an MOA:

Fort Gordon should complete a MOA or CA with those culturally affiliated Federally recognized

Tribes that wish to participate. An MOA will allow Fort Gordon to have a streamlined approach to comply with NAGPRA, NHPA, and other applicable federal regulations and executive orders, where consultation with Federally recognized Tribes is required. Fort Gordon conducted formal government to government consultation meetings with Federally recognized Tribes November 2007 and January 2011. Until the MOA is finalized, issues related to the disposition of human remains or significant adverse impacts to archaeological resources culturally affiliated with the Tribes, a formal government to government meeting will be held.

Historic Property Monitoring:

The CRM staff needs to continue the annual condition assessments. These assessments determine if damage has occurred or if there is a threat of damage to archaeological sites and historic buildings. The information collected during these annual surveys will be tracked for submitting a summary of findings to the GA SHPO

Information Management:

The CRMP currently maintains a GIS database, containing spatial information for all cultural resources identified on the installation, and a project review database tracking Section 106 reviews in accordance with the PA. These databases need to be updated regularly to ensure that all information is accurate for assessing impacts and for providing annual project review summaries to the GA SHPO.

Outreach:

The CRMP has been able to participate in more outreach and educational activities, though there is a need to expand and improve these opportunities. This can be accomplished through an update of the program website, the creation a new portable artifact case, the publication of a Fort Gordon cultural history book, and a long term goal of obtaining a small exhibit space at the Signal Corps Museum.

5.0 MANAGEMENT PLAN

This section defines standardized treatment measures for cultural resources at Fort Gordon. The emphasis is on how to coordinate cultural resource compliance requirements with routine and irregular elements of base operations. The section includes a set of Standing Operating Procedures (SOPs) describing particular steps to take during base operations in order to maintain compliance, and a discussion of operations where no compliance activity is required. The section lists Staff Responsibilities in relation to these compliance actions.

In order to avoid impacts to military readiness at Fort Gordon, cultural resource management and compliance activities need to be clearly outlined and coordinated with the particulars of facility operations. Commanders at Fort Gordon need to be aware of the necessary compliance activities and need to view these, whenever applicable, as direct and fully integrated elements of overall base operations. These activities cannot be seen as applicable only in unusual circumstances, or to be carried out by others. The SOPs outlined below provide specific compliance steps that must be taken during all phases—planning, execution, and follow up—of the described operations. An “after the fact” or “off to the side” approach to compliance may cause disruption to essential base mission activities, especially through scheduling problems resulting from delays in consultation with outside entities such as the GA-SHPO, the ACHP, and designated Federally-recognized tribal representatives.

These SOPs are written for direct use by installation staff, and are intended to fit in smoothly with how Fort Gordon staff is already carrying out its work. Each SOP includes an introductory paragraph, a statement of the applicable policies and compliance issues, and an outline of procedures to be followed. The SOPs also include a discussion of installation activities that will not require action in regard to cultural resources. The sections below also detail who is responsible at each step for implementation of the SOPs, when these steps need to be instituted, and who else needs to be contacted. In some cases, where quick action may be necessary, or where scheduling issues arise, the SOPs address what actions the responsible parties should take while waiting for the next step to be implemented.

In addition to carrying out these SOPs, Fort Gordon also needs to fulfill the compliance requirements listed and described at the end of Section 4, “Cultural Resources Inventory.” The compliance requirements are essentially one-time tasks fulfilling specific aspects of cultural resource laws and regulations applicable to Fort Gordon, while the SOPs are tasks requiring ongoing attention and follow through in order to keep Fort Gordon in compliance.

5.1 FORT GORDON STANDING OPERATING PROCEDURES

The following is a list of the Fort Gordon Standing Operating Procedures:

1. Integrate and Implement the Fort Gordon Cultural Resource Management Program

2. Section 106 Compliance
3. Section 110 Compliance
4. Inadvertent or Emergency Discovery of Archaeological Deposits
5. Archaeological Resource Protection Act (ARPA) Compliance
6. Curation Procedures
7. Native American Grave Protection and Repatriation Act (NAGPRA) Compliance
8. Maintenance and Access to Cemeteries
9. Actions in Regard to Extensive Alterations to the Facility Mission

5.2. SOP #1: INTEGRATE AND IMPLEMENT THE FORT GORDON CULTURAL RESOURCE MANAGEMENT PROGRAM

5.2.1 Description

This ICRMP details the process by which Fort Gordon remains in compliance with all applicable cultural resource management laws and regulations, including DoDI 4715.3 (Environmental Conservation Program). Such compliance is an essential element in Fort Gordon's efforts to serve as an effective steward of the lands and resources under its control. At the heart of this stewardship is an understanding and mindfulness of not just the "checklist" details of cultural resource compliance responsibilities, but also an understanding of the intent of the laws and regulations and a smooth integration of these efforts within the overall mission and operations of the installation. This section reviews the basic staff responsibilities for implementation of the Fort Gordon Cultural Resource Management Program, and points out places where these responsibilities intersect and require efforts at coordination in order for the program to achieve success. The CRM is responsible for coordinating cultural resource management with appropriate Fort Gordon staff, including the Installation Commander and the Director of Public Works.

5.2.2 Policy

Army Regulation 200-1: Cultural Resources Management outlines the Installation Commander's responsibility for compliance with federal cultural resource laws and emphasizes the need for integration of compliance efforts with general base operations.

Department of Defense (DoD) Directive 4710.1, dated June 21, 1984, and DoD Instruction 4715.16, dated September 18, 2008, state that it is the policy of the DoD to integrate archaeological and historic preservation requirements of various laws with the planning and management of DoD activities. The Directive assigns specific responsibilities to the heads of departments. It briefly lists management responsibilities that mirror the federal laws for archaeological and historic resources.

5.2.3 Procedure

All Army personnel with cultural resource management responsibilities at Fort Gordon will be aware of and familiar with their required compliance activities, and will communicate with other Fort Gordon staff in coordinating all steps in the compliance process.

The Installation Commander shall:

- Be familiar with his responsibilities in his official oversight capacity for compliance with federal cultural resource laws, as outlined in AR 200-1, and in Section 2, “Regulations and Statutes,” of this document
- Designate personnel who is responsible and accountable for executing the CRMP
- Set the tone for cultural resource compliance in terms of awareness of the process and in communicating to appropriate staff the importance of efficient and on-time compliance actions
- Ensure that cultural resources management is integrated with installation training and testing activities at Fort Gordon
- Establish funding priorities and program funds for the Fort Gordon cultural resources compliance and management activities into the Environmental Program Requirements report
- Review and provide comments on the CRM annual compliance report
- Serve as the Federal Agency Official with responsibility for installation compliance with NAGPRA
- Establish government-to-government relations with the applicable Federally recognized Indian tribes
- Conduct a comprehensive evaluation of the Fort Gordon cultural resources management program as elements of the plan are implemented

The Fort Gordon Cultural Resource Manager (CRM) position is currently held by the NEPA Coordinator in the ED/NRB. The CRM shall:

- Be familiar with his responsibilities as the staff member in direct charge of overseeing proper implementation of the ICRMP at Fort Gordon
- Become and remain aware of any operations, planned undertakings, or unexpected or emergency situations that might have an impact on identified cultural resources at the facility
- Review and comment on planned undertakings and changes in training activities at Fort Gordon that might have an impact on identified cultural resources at the facility
- Provide direction and oversight in the efforts of Fort Gordon to monitor and protect its known cultural resources
- Review and monitor general cultural resource compliance activities
- Update, as needed, the printed information on cultural resource protection distributed to training unit field officers, as developed to comply with the requirements of this ICRMP
- Integrate the activities of natural resources management program with the ICRMP

The Director of Public Works at Fort Gordon shall:

- Be familiar with his responsibilities in monitoring and protecting known facility historic properties (both archaeological sites and above-ground historic structures)
- Be mindful of how new undertakings might affect these resources and work with the CRM in reviewing such plans
- Communicate directly with field officers in charge of units training at Fort Gordon and other Fort Gordon components about the need to avoid the known cultural resources and

about the SOPs (listed below) having to do with the emergency discovery of archaeological deposits, the prevention of vandalism to cultural resources, and the treatment of human remains and funerary/sacred objects

- Ensure that the Master Planner has the ICRMP as a component plan within the installation Master Plan

Training Unit Field Officers shall:

- Be familiar with areas of Fort Gordon that are off-limits to training activities due to cultural resource concerns and make sure these areas are avoided during training activities
- Be familiar with SOP #4, “Inadvertent or Emergency Discovery of Archaeological Deposits,” and in the event of such discovery follow its steps accordingly
- Be aware of regulations prohibiting vandalism and looting (including casual artifact collecting) at historic properties (including archaeological sites) on Fort Gordon property, and inform troops under his or her command of these prohibitions

The Staff Judge Advocate shall:

- Review MOAs, PAs, and CAs and any other legally binding cultural resources documents for legal sufficiency

The Public Affairs Office (PAO), although having no required roll, may help locate historic information concerning sites or activities and may assist in developing interpretive programs. The PAO may also assist in promoting the ICRMP to the public and the installation.

The Command Historian and the Signal Corps Museum also do not have a formal requirement though they can assist in the creation of educational and outreach materials/opportunities. While both of these focus on the archival and material history of the Signal Corps, the archives of the Command Historian contains material relating to the pre-military history of Fort Gordon as well as its built environment in the form of photos and maps. The Signal Corps Museum may be utilized as a location for future displays of the cultural history of pre-military Fort Gordon.

5.3 SOP #2 SECTION 106 COMPLIANCE

5.3.1 Description

This SOP specifies procedures to apply when planning undertakings which might affect historic structures or archaeological sites at Fort Gordon.

An “undertaking” as defined by the National Historic Preservation Act (NHPA), describes a project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; those requiring a Federal permit, license or approval; and those subject to state or local regulation administered pursuant to a delegation or approval by a Federal agency.

Consequently, undertakings are those projects, activities or programs that are carried out by or on behalf of the Army; are carried out in whole or in part with Army funds; are under the direct or indirect jurisdiction of the Army; and or require Army approval.

If a project, activity, or program falls under one or more of the above criteria, it will be considered an undertaking. The Cultural Resources Manager (CRM) shall then consider whether the undertaking is the type of activity that has the potential to cause effects on historic properties, even if it is not known whether such properties may exist. For purposes of this SOP, “potential” shall mean “reasonable possibility.” If the undertaking will change a building or structure in any way; disturb the ground; produce something visible; produce something audible; produce something that smells; change land use; change traffic patterns; or change social, cultural or economic patterns then the undertaking will be considered to have the potential to cause effects on historic properties (36 CFR 800.5(2)). The undertaking is then subject to review under this SOP.

5.3.2 Policy

Section 106 of the NHPA requires the federal government to take into account the effects of their undertakings on historic properties eligible to the NRHP.

Fort Gordon developed a PA with the GA SHPO which streamlines the Section 106 consultation process. The PA directs what type projects require stakeholder consultation, allowing for the majority of minor maintenance, repair, and training activities to be reviewed in-house.

5.3.3 Procedure

5.3.3.1 Undertaking Review

All planned undertakings that may result in adverse effects to Fort Gordon NRHP-eligible resources shall be reviewed by the Fort Gordon CRM:

5.3.3.1.1 Undertaking Review in Accordance with the PA (SHPO)

- The CRM receives notification of projects through the National Environmental Policy Act (NEPA) process. Work orders and other projects submitted through the DPW are placed within the Work Coordination System (WCS) for review by all of DPW, to include the CRMP.
- Projects are reviewed for impacts to cultural resources in accordance with the PA (Appendix F). The PA lays out the process to review projects that will have no adverse affect (Exempt Activities).
- Upon review of the undertaking:
 - A. If the project will have no adverse affect on cultural resources in accordance to Stipulations II(A) in the PA, this determination will be entered by the CRMP into WCS and the PA project tracking database. The undertaking can then proceed as proposed.
 - B. If the project will have an adverse affect or there is a potential for unidentified cultural resources in the project area than consultation with the GA SHPO will proceed according to Stipulation V(B) in the PA. The CRMP review comments and consultation with the GA SHPO will be entered and tracked in WCS and the PA project tracking database. Once all cultural resource compliance is completed the undertaking can proceed.

5.3.3.1.2 Undertaking Review in Accordance with 36 CFR 800 (Tribes)

- The CRM receives notification of projects through the National Environmental Policy Act (NEPA) process. Work orders and other projects submitted through the DPW are placed within the Work Coordination System (WCS) for review by all of DPW, to include the CRMP.
- Projects are reviewed for impacts to cultural resources that have Native American components in accordance with 36 CFR 800
- Upon review of the undertaking:
 - A. If the project will have no adverse affect on cultural resources in accordance to 36 CFR 800.4, this determination will be entered by the CRMP into WCS. The undertaking can then proceed as proposed.
 - B. If the project will have an adverse affect or there is a potential for unidentified cultural resources in the project area than consultation with the Tribes will proceed according to 36 CFR 800.5. Once all cultural resource compliance is completed the undertaking can proceed.

5.3.3.2 Resolving Adverse Effects

The initial discussion of how to resolve adverse effects to historic properties will be coordinated with the SHPO per Stipulation V(B) of the PA. Consultation with the Tribes on the resolution of adverse effects will be in accordance with 36 CFR 800.6.

If mitigation is needed to resolved adverse effects innovative mitigation measures should be considered when appropriate. The standard mitigation measure for historic buildings is HABS/HAER documentation and for archaeological sites it is the execution of a Phase III, data recovery, survey. Examples of alternative mitigation of a resource can include a website or narrative history geared to a public audience. The decision of what type of mitigation will be made on a case-by-case base and will be worked out between Fort Gordon and the GA SHPO through the negotiation of creating a MOA.

5.3.3.3 Economic Analysis

Should buildings or structures that are determined eligible for the NRHP be scheduled for demolition at Fort Gordon during the 5-year period of the ICRMP, the NHPA requires that historic structures be “considered for re-use to the maximum extent feasible before disposal.” This means that the Facility Manager and the CRM must conduct an economic analysis to determine whether the historic structure’s re-use, replacement, or demolition is justified based upon a “least cost, life-cycle” investigation (software on DENIX prepared by CERL—Layaway Economic Analysis—available at <http://aec.army.mil/usaec/cultural/software.html>). The findings of the economic analysis must also be coordinated with the GA-SHPO prior to conducting any activities related to re-use, rehabilitation, demolition, or replacement.

It is recommended that any historic structures at Fort Gordon be maintained to avoid the future necessity of replacement or demolition. If replacement or demolition does become inevitable, the following factors must be evaluated prior to making that decision:

- The life cycle of the structure and the estimated costs to maintain a structure that appears to have “outlived” its usefulness
- The utility costs associated with the historic structure
- Replacement costs versus maintenance and utility costs

When considering replacement costs, the economic analysis must include an assessment of replacing the structure with a design that is *architecturally compatible* with the historic structure, rather than basing the costs on replacement in kind. Where rehabilitation costs exceed 70 percent of the replacement cost, replacement may be used (pending coordination with the GA-SHPO). However, the 70 percent value may be exceeded where the significance of a particularly historic structure warrants special attention. In any situation where historic structures are likely to be affected, even in situations where the undertaking is inevitable and cannot be avoided, Fort Gordon must coordinate with the GA-SHPO prior to conducting any activities related to the undertaking.

5.3.3.4 Annual Reporting Requirements

The activities, status, and results of all compliance actions taken under this SOP will be reported annually to the GA SHPO. The report will cover one calendar year and will be submitted no later than 31 January following the close of the calendar year. Contents of the compliance report shall include the following:

- A summary of compliance actions taken under each SOP

- A summary of known undertakings planned for the coming fiscal year
- A summary of findings from annual NRHP eligible resource monitoring survey (SOP #3)
- A summary of undertakings reviewed in accordance with the PA as per Stipulation VIV(C) of that document.

The GA-SHPO will have 30 days from receipt of the technical compliance report to comment. The CRM will take comments into account when updating reports

5.4 SOP #3 SECTION 110 COMPLIANCE

5.4.1 Description

This SOP directs the proactive management of cultural resources on Fort Gordon. Proactive management includes the evaluation of historic properties' eligibility to the NRHP and the monitoring and protection of NRHP eligible cultural resources on the installation.

Fort Gordon has completed a comprehensive survey of both architectural and archeological resources. A Phase I archaeological surveys of all areas, excluding UXO and already disturbed areas in the cantonment, have been done. As well, buildings built between 1942 and 1989 have been surveyed for historic significance in 2005. The next building survey will need to be conducted in 2015 based on the recommendation of the Cold War Building Survey for buildings that will need to be resurveyed when they reach 50 years old.

5.4.2 Policy

Section 110 of the NHPA requires federal agencies to manage the preservation of its historic properties and to evaluate the historic and cultural significance of them.

5.4.3 Procedure

5.4.3.1 Inventory of Unsurveyed Areas

The CRM should conduct a Phase I inventory of 119 acres in training areas 23 and 1 that were left out of previous survey coverage.

5.4.3.2 Evaluation of NRHP Eligibility

The CRM should conduct Phase II NRHP eligibility evaluations on the following as funding is available or if these sites will be adversely affected by an undertaking:

- Sites that are currently determined potentially eligible for the NRHP.
- Survey historic homesites that still retain their integrity causing a discrepancy with the Phase I survey recommendations.

5.4.3.3 Contracted compliance projects

These reports will be reported to the GA-SHPO through the submission of a draft technical report. Survey and testing reports will contain recommendations of NRHP eligibility for all cultural resources.

- The confidentiality of all site locations will be preserved.
- Where the GA-SHPO concurs on the recommendation of eligibility, the final report will

reflect that concurrence.

- Where the GA-SHPO does not concur with the recommendation, the CRM and the Principal Investigator for the investigation will consult and try to reach agreement.

A. Where an agreement cannot be reached, Fort Gordon will continue to protect sites until a final determination about NRHP eligibility status can be reached.

5.4.3.4 Monitoring and Protection of NRHP Eligible Cultural Resources

The Fort Gordon CRM shall visit all recorded NRHP-eligible and potentially eligible historic properties at Fort Gordon on a biannual basis and file a report describing the condition of the property with special reference to any newly discovered damage or ongoing threats to the property. The biannual schedule will involve visiting half the installation each year. Thus the area surveyed will alternate each year between 1) training areas 1-32 and the Small Arms Impact Area and 2) training areas 33-49 and the Artillery Impact area.

Initial conditions of these resources were collected in 2006-07 by way of forms installed on a Global Positioning System (GPS) unit. These forms documented existing damage such as road construction or vandalism and the potential for future vandalism of the site. Annual surveys completed, after the initial condition was documented, reviews any changes or new damage that has occurred at the site. The initial condition assessments as well as the annual survey information is kept within the Cultural Resources geodatabase.

During annual visits to Fort Gordon NRHP-eligible historic properties, the CRM shall undertake the following tasks:

- Inspection of the resource for any changes (e.g., erosion, vandalism, or other visible damage) in comparison to descriptions in earlier inventories or in reports from previous years.
- If no signs of damage are apparent, the CRM will produce a short report noting the date of the visit and the fact that the condition of the resource is stable. The results of this report will be filed annually as outlined in SOP #2.
- If the resource shows signs of recent damage, see below.

If the CRM determines during the annual visit that the resource has been damaged, he or she shall take the following actions:

- Document the damage in writing and by photography and other means (video, sketch maps, etc.) as deemed necessary. A report describing and illustrating the damage should be included along with remediation action plans in the CRM generalized annual report (see SOP #9) with copies to the GA-SHPO.
- The causes of the damage shall be determined and described.

A. If the damage is related to natural processes, such as erosion of an archaeological site or decay of elements of a structure:

1. The CRM shall work with the Director of Public Works to repair or

stabilize the damage.

2. The CRM and the Director of Public Works will develop an action plan for eliminating or minimizing further damage from this cause.

B. If the damage is related to unintentional actions of base personnel or others using the facility, through such activity as off-road vehicle tracks, foot traffic, field encampment impacts, etc.:

1. The CRM and the Director of Public Works shall work to prevent further occurrences of such damage.
2. Prevention could include permanent security fencing around the resource, physical barriers to vehicle traffic, or enhanced directives about required avoidance of designated protected areas to training unit field officers.

C If the damage is clearly intentional and related to site looting or vandalism, follow steps outlined in SOP #5

5.5 SOP #4: INADVERTENT OR EMERGENCY DISCOVERY OF ARCHAEOLOGICAL DEPOSITS

5.5.1 Description

Regardless of whether a surface inventory has been completed or not, and regardless of whether a planned undertaking has been assessed for its effect on *known* historic properties, every undertaking which disturbs the ground surface has the potential to discover buried and previously unknown archaeological deposits. This SOP outlines the policies and procedures to be followed in such cases.

5.5.2 Policy

Archaeological deposits that are newly discovered in the planning or construction of any undertaking shall be evaluated for their NRHP eligibility.

Until such time as the GA-SHPO has concurred with a recommendation that an archaeological site is not eligible, all known sites will be treated as potentially eligible and will be avoided insofar as possible.

Nothing in Section 106 or other federal regulations requires the Army to stop work on an undertaking after consultation is complete. However, if the GA-SHPO indicates that the property is significant and the effects of the undertaking on the newly discovered historic property are serious, then Fort Gordon shall make reasonable efforts to minimize harm to the property.

5.5.3 Procedure

Archaeological deposits accidentally exposed during training operations and undertakings at Fort Gordon will be examined and assessed for NRHP eligibility by a qualified professional archaeologist as soon as possible after discovery.

Officer in Command (OIC), the Director of Public Works, and Project Managers will remain on the watch for discovery of unexpected buried archaeological material in the course of normal operations or during specific undertakings. This requirement applies even to undertakings that have already received review through SOP #2.

- For the purposes of this SOP, “unexpected buried archaeological material” includes such items as concentrations of lithics, pottery, glass, metal, building material (such as brick), and especially bones and obvious burials.

- A. Debris of obviously modern origin, consisting of recent bottles and cans and/or synthetic materials such as plastic, does not qualify for further attention under this SOP.
- B. Isolated finds, such as a stone tool (“arrowhead”) or other single items unassociated with a concentrated deposit of artifacts, do not qualify for further attention under this SOP.
- C. Personnel unsure of whether or not an unexpected discovery warrants further attention should not hesitate to call the CRM for more experienced assessment, as outlined below.

When unexpected buried archaeological material of note is found, training and other activity near the find should be halted and the unit commander should be notified. If located in a training area, the Unit Field Officer should establish a 20-m (60-foot) off-limits buffer around the find. Range control should be alerted to the discovery, and the need to keep training exercises away from the find, outside the established buffer. Once the buffer is established, training may resume in the vicinity. In non-training area contexts, construction or other activities must cease in the area pending notification of and review by the CRM.

The CRM shall be notified of such finds immediately after discovery, and he or she will contact the Director of Public Works and explain the details of the find.

Once notified of the possible discovery of unexpected buried archaeological material, the CRM will arrange to have a professional archaeologist visit the excavation as soon as possible (within 48 hours), to examine and evaluate the recovered material and any *in situ* deposits.

If the recovered material proves to be natural stones, concretions, or other such items that are sometimes mistaken for archaeological materials, then the CRM may allow the excavation to proceed without further action. Any paleontological resources that are discovered are considered objects of antiquity, pursuant to the Antiquities Act, and should be preserved as scientific data until they can be assessed by a qualified professional.

If, upon examination, the recovered items do turn out to clearly be of human origin, the archaeologist must make a field evaluation of the primary context of the deposit and its probable age and significance, recording the findings in writing and documenting the materials with photographs and drawings as warranted. The CRM shall file site forms recording the find with the Georgia Archaeological Site File in Athens in a routine manner.

- If disturbances to the deposit have been slight, minor alterations to the operation or undertaking causing the disturbance may be made in order to avoid further damage to the buried site.
- If the details of the operation or undertaking cannot be relocated, the CRM shall report the discovery and initiate emergency consultation with the GA-SHPO as soon as possible.

A. If both the GA-SHPO and Fort Gordon concur that the deposits are not eligible

for inclusion to the NRHP, then the CRM will prepare a memorandum for record, to be included in the site record. The operation or undertaking may proceed, but a professional archaeologist must monitor further ground disturbance in case the work encounters additional archaeological deposits that may be eligible.

- B If, in the opinion of either Fort Gordon or the GA-SHPO, the information initially gathered by the archaeologist is deemed insufficient to make a determination of eligibility, then an emergency-testing plan will be developed by Fort Gordon with coordination and concurrence from the GA-SHPO. Further operations or project undertakings in the vicinity of the site will be suspended until an agreed testing procedure has been carried out and sufficient data has been gathered to allow a determination of eligibility.
1. If the GA-SHPO and Fort Gordon agree after testing that the site is not eligible for inclusion to the NRHP, then work on the project may resume.
 2. If the site appears to be eligible for inclusion to the NRHP, or if Fort Gordon and the GA-SHPO cannot agree on the question of eligibility, then Fort Gordon shall implement one of the following alternative actions, depending on the urgency of the action being delayed by the discovery of cultural material.
 - a. Fort Gordon may relocate the project to avoid adverse effect.
 - b. Fort Gordon may proceed with a data recovery plan under a MOA with the GA-SHPO. The MOA shall specify the scope and level of effort of data recovery required to mitigate the adverse impact of the project on the site in question. Where data recovery is expected to be limited in scope and amenable to informal coordination among Fort Gordon, the GA-SHPO, and the Principal Investigator, Fort Gordon may proceed with a data recovery plan without negotiating an MOA.
 - c. Fort Gordon may request a determination of eligibility from the Keeper (pursuant to 36 CFR 63).

The activities, status, and results of all compliance actions taken under this SOP will be reported annually as outlined in SOP #2.

5.6 SOP #5: ARCHAEOLOGICAL RESOURCE PROTECTION ACT (ARPA) COMPLIANCE

5.6.1 Description

The Archaeological Resource Protection Act of 1979 (ARPA) makes it a federal crime for persons to excavate, remove, damage, or otherwise deface any archaeological resource or paleontological remain located on federal lands. Fort Gordon has the responsibility to monitor its archaeological resources for such violations and enforce the laws prohibiting such activity.

Exceptions to the law require a specific federal permit, usually only granted to professional archaeologists carrying out legitimate and well-supported scientific research. The Corps of Engineers (COE) issues permits for ARPA related work on military controlled lands. This SOP incorporates the requirements of the law and the implementing regulations issued by the Department of Defense (DoD) (32 CFR Part 229).

5.6.2 Policy

The excavation or removal of archaeological artifacts or paleontological remains is prohibited, except as conducted under a valid permit.

The use of metal detectors on-post is prohibited, except by permit.

Fort Gordon shall proactively protect and preserve archaeological sites from vandalism, looting, and other forms of unauthorized excavation.

5.6.3 Procedure

The CRM will periodically monitor the condition of known archaeological sites for evidence of vandalism, following steps outlined in SOP #2.

- Vandalism and other ARPA violations to these sites will be reported for investigation and prosecution to the appropriate local law enforcement authorities.
- ARPA violations will be reported to the GA-SHPO as specified under SOP #2.
- The CRM will cause to be published, at least once a year in Fort Gordon/Army periodicals or newsletters, brief notices outlining actions prohibited under ARPA and the criminal penalties.
- The CRM will prepare a written directive detailing the prohibition against vandalism and looting of archaeological resources on Fort Gordon property.

- A. The document will include information on the applicable laws and penalties covering such activity.

- B. The Director of Public Works will include the document with other material distributed to all Army units and other groups making use of the training facilities at Fort Gordon.
- Any vandalism or looting of archaeological sites noted or observed by Fort Gordon personnel will be reported directly to the CRM. The CRM will inspect the damaged site, and proceed with steps for reporting and investigating the matter as detailed above.
- An ARPA permit is not required for operations and undertakings that are conducted exclusively for purposes other than the archaeological excavation and/or removal of archaeological or paleontological remains, even when such activities may result in the disturbance of such remains. However, in such cases, Fort Gordon must comply with the requirements for Section 106 consultation as discussed in SOP #2.

Applications for archaeological excavation permits must be submitted to the Fort Gordon CRM.

- Upon review and approval by the CRM, applications must be forwarded for review and approval by the Fort Gordon Command.
- Applications will be forwarded to the Savannah District, U.S. Army Corps of Engineers.
 - A. A qualified archaeologist appointed by the COE District Commander must conduct technical review of the application.
 - B. Applications must include a clearly written proposal that documents the information required under 32 CFR 229.6 and 32 CFR 229.8.
- The Installation Commander must approve the permit request before the USACE District Real Estate Office can issue it. This approval is documented by issuing a Report of Availability to the District Real Estate Office.
- The District Real Estate Office is responsible for coordination and issuance of permits.
 - A. Copies of approved ARPA permits will be provided to the Fort Gordon CRM.
 - B. A permit may be denied for reasons of technical inadequacy or incompatibility with military programs.
 1. The applicant must be advised of the reason for the denial.
 2. If the denial is for technical reasons, the applicant must be advised of the right to resubmit the application.
- The CRM shall monitor work conducted under ARPA permits to ensure compliance with the terms of the permit. A permit may be revoked (by the District Real Estate Office) if it is determined:
 - A. The applicant has not complied with the terms of the permit
 - B. The applicant has misrepresented the work to be accomplished
 - C. Continuance of the work is a hazard to public health or safety
 - D. Continuation of the work impairs any military function

- Appeals will be forwarded to the Installation Commander for review by the CRM. The Division Engineer will sign the Determination of Appeal.

The activities, status, and results of all compliance actions taken under this SOP will be reported annually as outlined in SOP #2

5.7 SOP #6: CURATION PROCEDURES

5.7.1 Description

In accordance with the requirements of 36 CFR 79, Curation of Federally-Owned and Administered Archaeological Collections, AR 200-1 requires that all archaeological collections and associated records, as defined in 36 CFR 79.4(a), are processed, maintained and preserved. Historical artifacts associated with military activities may be subject to the requirements of AR 870-20, Army Museums, Historical Artifacts, and Art. .

5.7.2 Policy

Archaeological collections should be deposited in a qualified repository that will safeguard and permanently curate the collection in accordance with federal guidelines. Collections generated by federal agencies and programs must be curated by an appropriate repository.

A curation facility is specifically designed to serve as a physical repository where artifacts are stored in an environmentally controlled, secure area. Proper curation also includes a review and update of all paper records. Artifact data are entered into a database, which is an important management and research tool. The overall goal of the federal curation program, as set forth in 36 CFR 79, is to ensure the preservation and accessibility of artifacts for use by members of the public interested in the archaeology of the region.

Pursuant to AR 870-20 section 1.4e(1), the Installation Commander will appoint an Artifact Responsible Officer (ARO), who will be responsible for management and care of historical artifacts under the control of Fort Gordon. The ARO will develop policies and procedures for care of Fort Gordon military artifacts that will meet the standards of AR 870-20.

5.7.3 Procedure

Before permanent curation, all artifacts recovered from Fort Gordon will be analyzed by the archaeological contractor. The contractor must do the analysis as specified by the GA-SHPO. Cleaning, curation, and storage of artifacts and associated documents will meet professional standards. All collections and field records will be reproduced on archival-quality paper.

The annual Secretary of the Interior's report to Congress requires an assessment of archaeological records and materials in federal repositories. The CRM shall determine, on an annual basis, the volume of records and materials curated on its behalf at a curation facility.

Inspections of federally-curated archaeological collections shall be conducted periodically IAW

the Federal Property and Administrative Services Act (40 U.S.C. 484), and its implementing regulation (41 CFR 101). Consistent with 36 CFR 79.11(a), the CRM shall:

- Periodically inspect the physical environment in which all archaeological materials are stored for the purpose of monitoring the physical security and environmental control measures.
- Periodically inspect the collections in storage for the purposes of assessing the condition of the material remains and associated records, and of monitoring those remains and records for possible deterioration and damage.
- Periodically inventory the collection by accession, lot or catalog record for the purpose of verifying the location of the material remains and associated records.
- Periodically inventory any other U.S. Government-owned personal property in the possession of the CRM.

The activities, status, and results of all compliance actions taken under this SOP will be reported annually as outlined in SOP #2.

5.8 SOP #7: NATIVE AMERICAN GRAVE PROTECTION AND REPATRIATION ACT (NAGPRA) COMPLIANCE

5.8.1 Description

In addition to the general requirements for curating archaeological collections, the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) requires the inventory of human remains and funerary and sacred objects recovered from federal lands which may be subject to claim by Federally-recognized Native American tribal groups, and the active consultation with such groups to determine the disposition of such remains and objects. No such remains or objects are currently known to exist at Fort Gordon or in archaeological collections from sites investigated at the facility. This SOP outlines the policies and procedures to be followed to ensure future compliance.

In 1995 Fort Gordon completed a NAGPRA Section 6 Summary report of the archaeological collection. This report reviewed the artifact collection for the presence of human remains and/or funerary objects. No items falling under NAGPRA were found. There have not been any burials excavated during any archaeological investigations since the writing of this report.

5.8.2 Policy

NAGPRA compliance requires that no Native American human remains, funerary objects, or sacred objects will be knowingly kept in government possession without initiating consultation. Consultation with the appropriate Federally recognized tribal group regarding the disposition of Native American human remains, funerary objects or sacred objects shall be initiated as soon as feasible.

5.8.3 Procedure

The CRM will review in advance all archaeological permits, research designs, and scopes of work to ensure that archaeological investigations at Fort Gordon comply with its requirements.

- If human remains or artifacts that are currently not in government possession but that are suspected to be from Fort Gordon are returned to the government, the CRM will arrange to have a professional archaeologist examine and evaluate the recovered material.
 - A. If the remains are not of human origin, then no further action is necessary by the CRM.
 - B. If the remains are not of Native American origin, then the remains will be documented and prepared for curation following GA-SHPO standards.

- C. If the remains are of Native American origin, then the CRM will prepare an inventory of the remains and will initiate consultation procedures with the appropriate Federally-recognized tribal groups.
- If human remains are discovered accidentally during the course of any undertaking, the following procedures will apply:
 - A. Work will immediately cease in the vicinity of the human remains.
 - B. The site supervisor will immediately notify the appropriate local law enforcement authorities and the CRM.
 - 1. If the local law enforcement authorities determine that the remains are of recent origin, then no further action is necessary by the CRM and the undertaking may proceed, unless otherwise directed by law enforcement personnel.
 - 2. If the remains are not recent, the CRM will arrange to have a professional archaeologist visit the site as soon as possible (within 48 hours), to examine and evaluate the recovered material.
 - a. If the remains are not of human origin, then no further action is necessary by the CRM and the undertaking may proceed.
 - b. If the remains are not of Native American origin, then the site will be treated as stipulated under SOP #6, "Emergency Discovery of Archaeological Deposits."
 - c. If the remains are of Native American origin, then further work in the vicinity will be suspended for 30 days to allow for consultation, as required by NAGPRA. Prior to removal of any remains, the CRM will prepare an inventory of the remains and will immediately initiate emergency consultation procedures with the appropriate Federally-recognized tribal groups.
 - 1) If consultation allows the remains to be removed, then the CRM will insure that the remains are treated and disposed in accordance with the consultation.
 - 2) If consultation does not allow the remains to be removed, then no further work may proceed in the vicinity of the remains.
 - 3) Notwithstanding the results of consultation, the CRM will cause the site to be treated as stipulated under SOP #4

5.9 SOP #8: ACCESS AND MAINTENANCE TO CEMETERIES

5.9.1 Description

There are 43 private family cemeteries and 2 POW cemeteries within the Fort Gordon installation boundary. There are 646 graves identified, with burial dates from 1827-2005, within these cemeteries. Cemeteries are included in the annual survey of archaeological sites and the condition of the cemetery and graves is noted. All information on the names and dates of those buried is kept at the Fort Gordon cultural resource office.

5.9.2. Policy

All cemeteries shall be preserved intact and undisturbed IAW DoD burial laws and AR 210-190.

Fort Gordon also complies with a memo dated 21 May 1952 on the “Maintenance of Private Cemeteries” from Headquarters Third Army, Fort McPherson, GA.

5.9.3. Procedure

Private family cemeteries are open for public access. These visits must be coordination with the Public Affairs Office (PAO), the CRMP, and Range Control, to insure that the visit will not conflict with training activities.

Cemeteries will be maintained in the following ways:

- The grass will be mowed twice a year by DPW Roads and Grounds.
- Cemeteries will be fenced and fences will be repaired or replaced as needed.
- Grave markers will be maintained in an upright position.
- Grave markers damaged by natural forces will not be repaired by Fort Gordon, however family or decedents are free to repair stones at their own expense.
- Cemeteries will be protected from damage due to military activities and small arms or munitions firing. If grave markers are damaged through the actions of military personnel Fort Gordon will repair them through appropriate means for the type of marker used.
- Vehicles are restricted from entering any cemetery unless needed for maintenance and repairs

Cemeteries will be visited annually by CRMP staff to record condition of the overall cemetery and the graves/gravestones therein. The results of this condition survey will be kept and submitted as part of the annual report to the GA SHPO (SOP#2). If identified during the annual condition survey, deficiencies in the maintenance requirements, as stated above, will be resolved.

5.10 SOP #9: ACTIONS IN REGARD TO EXTENSIVE ALTERATIONS TO INSTALLATION MISSION

5.10.1 Description

The SOPs listed above refer to standardized cultural resource compliance actions outlined in DoDI 4715.3 that are applicable to the Fort Gordon current mission. As of this writing, there are no plans for this mission to change through 2014, the 5-year period covered by this ICRMP. Any unexpected changes to the Fort Gordon mission and operations or other substantial alterations at the facility (e.g., major new construction or acquisition or disposal of land) will require concurrent reconsiderations and possible reconfiguring of the facility Cultural Resource Program.

5.10.2 Policy

DoD Directive 4710.1, dated 21 June 1984, states that it is the policy of the DoD to integrate archaeological and historic preservation requirements of various laws with the planning and management of DoD activities.

The avoidance of adverse effects to NRHP eligible structures and archaeological sites at Fort Gordon shall be proactively incorporated into the design and planning process.

5.10.3 Procedure

When and if major alterations to the Fort Gordon current mission and operations are made, the CRM will become involved at an early stage in the planning process to make sure such changes comply with all applicable cultural resource laws and regulations.

- In regard to any changes planned on current base property, the CRM will apply all applicable SOPs as listed above (e.g., SOP #2, “Section 106 Compliance”)
- If the facility acquires additional property:
 - A. The CRM will initiate efforts to have qualified professionals survey and inventory all structures and archaeological sites on the property.
 - B. Such an inventory will include NRHP eligibility recommendations for each property.
 - C. Results of the survey and inventory will be presented to the GA-SHPO, who will comment on recommendations of NRHP eligibility.
 1. Any newly discovered sites will be treated as potentially eligible and will be avoided wherever possible until such time as the GA-SHPO has had an opportunity to comment on the NRHP eligibility recommendation.

2. For archaeological sites and architectural resources that the GA-SHPO concludes are eligible for the NRHP:
 - a. The CRM will take steps to protect such resources from adverse effects in the course of the development and the use of the newly acquired property
 - b. The NRHP eligible properties will receive continuing appropriated attention and care as listed under the SOP's outlined above—e.g. SOP#2 “Section 106 Compliance”, SOP#3 “Section 110 Compliance”, SOP#5 “ARPA Compliance”, SOP#7 “NAGPRA Compliance”)
3. When the GA-SHPO requests further information and evaluation of the eligibility of archaeological sites, (typically through Phase II testing), such sites will be treated as potentially eligible and will be avoided wherever possible until a final determination of eligibility has been made.
4. Where archaeological sites and standing structures on the newly acquired property are determined to be ineligible for the NRHP:
 - a. No cultural resource compliance requirements apply.
 - b. Fort Gordon may proceed with any undertakings that will impact these properties.

6.0 PUBLIC INVOLVEMENT PLAN

This section presents the consultation and coordination process, as it relates to public participation and tribal consultation, to be conducted by Fort Gordon for future undertakings on the installation.

Public participation is a crucial component in Fort Gordon's efforts to comply with federal cultural resources regulations. This component of the regulatory process allows for the Army to show the public and interested parties its accountability in regulatory compliance. Public participation ensures that citizens are informed of the environmental issues that may affect them and involve them in the decision making process throughout the entire compliance process.

The Army must provide the public, except in cases of confidentiality concerns, with information about the effects of their undertakings on cultural resources located on installation lands. The goal of providing this information is to receive public input and comment as well as citizen views for the Army to take into consideration during the decision making process.

Keeping the public informed and involved in the compliance process helps to avoid miscommunications and conflicts that could result in delay of the regulatory process and installation operations. There are two components in public participation: 1) public outreach and education, and 2) public involvement. The goal of public outreach and education is to increase public awareness of the environmental issues, including cultural resource preservation, affecting installation operations. Public involvement encourages citizens to become involved in the decision-making process. It allows the public and the DOA to initiate and maintain good relationships and open communication between the two entities as well as with other stakeholders (EPA 1999:2.4).

In order to accomplish these goals, Fort Gordon should be able to demonstrate that it makes a good faith effort to take into account the view of the public on cultural preservation issues. The following considerations should be taken into account when developing a methodology for public involvement:

- The nature of the undertaking (i.e., building a culvert vs. moving a cemetery)
- The complexity of the undertaking (i.e., limited changes to roads vs. acquisition of additional facility property)
- The extent of public interest
- Measures needed to insure the confidentiality of cultural sites, including location, identification, evaluation, and protection (i.e., weighing the public need to know about cultural resources vs. the necessity to protect archaeological artifacts from looters).

Copies of all published public notices, news releases, and public comments received should be filed.

6.1 PUBLIC INVOLVEMENT PROCESS

The first step in the public involvement process is to determine what type of undertakings require public involvement and to what extent the public should be involved. This is accomplished by defining the extent of the undertaking and its potential impact(s) to cultural resources.

If a proposed undertaking has the potential to affect a NRHP-listed or -eligible property, current statutes and regulations require public involvement. If the undertaking may *adversely* affect a historic property, public consultation should provide written notification to interested parties, preferably through correspondence or a newspaper announcement. The letter or announcement should provide a general description of the proposed undertaking, the resource(s) that may be affected by the undertaking, and plans to mitigate or minimize the impact on the resource(s).

The letter or notification may request that comments (from the public) in response to the undertaking be submitted (in writing) within a 30-day period. Fort Gordon will appoint an individual to act as the point of contact, such as the CRM. The point of contact will be responsible for addressing public comments. The public responses should be collected, transcribed, and then issued in written format as a stand-alone document or as an appendix to the general compliance document.

If the proposed undertaking involves an action of greater magnitude, a more complex level of public involvement may be necessary. If the level of undertaking will require NEPA compliance at the level of an Environmental Impact Statement, it will incorporate public involvement as an integral component of the NEPA process. Integrating public involvement requirements into a single plan can result in significant time and cost savings. Such plans should be developed and implemented with the installation's Public Affairs Office" (DOA 1998:4).

6.2 PUBLIC PARTICIPATION LIST

In order to determine what members or sectors of the public should be notified and invited to participate in the consultation process, Fort Gordon needs to prepare a list of organizations that might be interested in proposed projects affecting cultural resources.

Suggested resources for compiling a public participation list include the GA-SHPO lists of historic sites/museums, regional development centers, and local historical societies, the National Trust for Historic Preservation list of member organizations in Georgia, the American Association for State and Local History's *Directory of Historical Societies and Agencies in the United States and Canada* (1982), and local county executives.

6.3 CONSULTATION WITH FEDERALLY-RECOGNIZED NATIVE AMERICAN TRIBES

In accordance with the DoD Memorandum issued February 8, 2001 [Integrated Cultural Resources Management Plans and Consultation Guidance; National Historic Preservation Act of 1966 (revised 2001); NAGPRA; EO 13175; and 36 CFR 800], it is directed that each installation shall initiate consultation with affiliated, Federally-recognized Indian tribes, Alaskan Native villages and village corporations, and Native Hawaiians (Germain 2001:1–2). This consultation must be conducted on a government-to-government basis and must include consultation with the GA-SHPO.

There are no Federally-recognized Native American tribes or reservations currently residing within the State of Georgia. However, several southeastern tribes do have aboriginal ties to the state. A list of these tribes is included in Appendix C.

The following provides a description of the recommended methods for completing tribal consultation.

6.3.1 Description of Undertaking

Pursuant to compliance being conducted by Fort Gordon as part of NEPA and NHPA for various projects on the fort, 36 CFR 800 requires consultation with Federally-recognized tribes that are currently located in, or that have historic affiliations to, lands on or adjacent to the installation.

6.3.2 Purpose of Tribal Consultation

Tribal consultation procedures shall be developed in support of the Army's responsibilities under NHPA, NAGPRA, and EO 13007. The primary goal of developing consultation procedures is to streamline the process of consulting with Federally-recognized Indian tribes. Fort Gordon will elicit comments from the consulting tribe(s) regarding their concerns about the impact of activities on potential TCPs, sacred sites, archaeological and historic sites, and human burials within the Area of Potential Effects (APE). Fort Gordon will also identify other concerns expressed by the consulting tribe(s).

6.3.3 Current Status of Consultation with Federally-Recognized Tribes

Fort Gordon completed a cultural affiliation study in 2007 identifying ten Federally recognized tribes that historically have a cultural ties to the land occupied by the installation. Upon completion of this study, those identified Tribes were contacted and the installation conducted its first Tribal consultation meeting November 2007. While the five year planned undertaking list does not include projects impacting sites with a Native American cultural component, regular consultation meetings scheduled at a maximum 2 year interval should occur to establish good relationships between the culturally affiliated Tribes and Fort Gordon.

7.0 ENVIRONMENTAL ASSESSMENT

An Environmental Assessment (EA) is presented in this section to support the Department of the Army's proposal to implement the ICRMP for Fort Gordon, in accordance with AR 200-1. Additionally, this EA is prepared in accordance with NEPA, and its implementing regulations published by the Council on Environmental Quality (CEQ) (40 CFR 1500–1508), and 32 CFR 651, Environmental Analysis of Army Actions Final Rule. Collectively, these regulations establish a process by which the Army considers the potential environmental impacts, or effects, of its proposed actions, and invites the comments of interested citizens and organizations to examine concerns, and prepares alternatives prior to deciding on a final course of action. CEQ regulations specify that an EA should briefly provide evidence and analysis for determining whether to prepare an EIS or a Finding of No Significant Impact; aid in the compliance of an agency with NEPA when an EIS is unnecessary; and facilitate preparation of an EIS when one is necessary.

An EA may be prepared at any time in order to assist planning and decision-making, and is included here as an integral part of the ICRMP. The EA includes the purpose of, and need for, the proposed action (Section 7.1); a description of any alternatives considered and the no action alternative (Section 7.2); a characterization of existing conditions (the affected environment) (Section 7.3); and known, potential, and reasonably foreseeable environmental consequences (both beneficial and negative) related to the proposed action and its alternatives, including cumulative effects (Section 7.4).

There will be a 30-day public comment period associated with this EA, following public involvement guidelines presented in Section 7 of this ICRMP.

7.1 PURPOSE AND NEED FOR PROPOSED ACTION

7.1.1 Proposed Action: Implementation of the ICRMP

The proposed action is to implement the ICRMP for Fort Gordon. Pursuant to AR 200-1, an ICRMP is required for lands owned or leased by the Army. The purpose of and need for implementing this operational plan is to provide each post Commander with the information, procedures, and overall process to make informed decisions about the management of the cultural resources located on lands owned or leased by the Army. This EA addresses the potential impacts of implementing or not implementing the ICRMP for this site.

Implementation of the ICRMP, as proposed by Fort Gordon, would enable the effective management of cultural resources and protect the cultural setting. Plan implementation would support Fort Gordon's continuing need to ensure the safety and efficiency of the facility's mission while practicing sound resource stewardship and complying with environmental policies

and regulations. Additionally, the ICRMP will ultimately enhance readiness capabilities by anticipating impacts or training delays due to cultural resource management activities.

The purpose of the proposed action is to carry out specific management measures developed in the ICRMP. It focuses on a 5-year planning period, beginning in FY 2011 and ending in FY 2016, consistent with the timeframe for the management measures as described in the ICRMP. Additional environmental analyses may be required as new management measures are developed beyond the 5-year effective window, or if management measures not currently identified in the ICRMP are developed with the intentions to be implemented within the described 5-year period.

Specific cultural resource projects and activities are discussed in Section 4 of the ICRMP. In summary they include the following:

- Develop and negotiate an MOA with Federally recognized Indian Tribes
- Evaluate the NRHP eligibility of the Signal School Headquarters and Classroom Campus
- Test the 114 archaeological resources having a potentially eligible NRHP determination. Phase II testing will be conducted subject to availability of funds. Phase II testing and coordination with the GA-SHPO would be required if any ground-disturbing activities are planned.

When compared with the no-action alternative described in Section 7.2, environmental conditions at Fort Gordon would improve as a result of implementing the proposed ICRMP. Therefore, the proposed action of implementing the ICRMP is the preferred alternative. In addition, by adopting the proposed alternative, Fort Gordon meets the requirements of Department of Defense Instruction (DODI) 4715.3, *Environmental Conservation Program*, and AR 200-1.

7.1.2 Integration with Other Environmental Statutes and Regulations

To comply with NEPA, the planning and decision-making process for actions proposed by federal agencies involves a study of other relevant environmental statutes and regulations. The NEPA process, however, does not replace procedural or substantive requirements on other environmental statutes and regulations. It addresses them collectively in the form of an EA or EIS, which enables the decision maker to have a comprehensive view of major environmental issues and requirements associated with the proposed action. According to CEQ regulations, the requirements of NEPA must be integrated “with other planning and environmental review procedures required by law or by agency so that all such procedures run concurrently rather than consecutively.”

The following subsections present descriptions of relevant laws, regulations, and other requirements that are often considered part of the analysis. See Section 2 for cultural resources law.

When an undertaking on non-Indian lands, as defined in NHPA Section 301(7), is found to affect properties having historic value to an Indian tribe, the Army shall afford such tribes the

opportunity to participate as interested persons (see 36 CFR 800.1(c)(2)(iii)). As directed by NHPA Section 101(d)(6)(b), the Army, in carrying out its Section 106 responsibilities, shall consult with Indian tribes that attach importance to traditional religious or cultural properties that are eligible for listing in the NRHP. Consultation with Indian tribes is required when historic properties of traditional religious or cultural importance to those groups may be affected by a specific proposed federal undertaking (Section 106).

Consultation is required under Native American Graves Protection and Repatriation Act (NAGPRA) to determine cultural affiliation of human remains and specific cultural items that derive from intentional excavations and inadvertent discoveries of federal lands. In addition, consultation is required to determine custody (or disposition) of human remains and certain cultural items (funerary objects, sacred objects, or objects of cultural patrimony) recovered from federal lands. In cases of intentional excavation or inadvertent discovery of human remains and cultural items on federal lands, the notification and consultation procedures set out in 43 CFR Part 20 shall be followed. Consultation is required when the installation commander reasonably believes a planned activity may result in the excavation of Native American human remains or cultural items.

The Installation Commander should seek the participation of interested Indian tribes, and other members of the interested public including non-recognized Indian groups, as appropriate, the NEPA decision-making process for actions that may affect:

- historic properties of traditional cultural or religious importance, and historic resources and historic properties as defined by NHPA Section 101(d)(6);
- sites containing cultural items as defined by NAGPRA Section 2(3);
- archaeological sites or religious or cultural significance in accordance with ARPA (16 U.S.C. 470cc(c);
- sacred sites whose access is protected under AIRFA; or
- reservation lands or off-reservation treaty rights.

Tribal representatives must be included in the scoping process for assessing environmental impact. Other Native Americans, including traditional cultural leaders, may participate as interested parties. Impacts to treaty rights and resources important in sustaining Native American activities, such as plant harvesting, hunting, fishing, and water rights should, as appropriate, also be considered in the NEPA process. NEPA requires the federal agencies to request comments of Indian tribes (40 CFR 1503.1(a)(ii)).

The Clean Air Act (CAA) establishes federal policy to protect and enhance the quality of national air resources to protect human health and the environment. The CAA requires that adequate steps be implemented to control the release of air pollutants and to prevent significant air quality deterioration. The 1990 amendments to the CAA require federal agencies to determine the conformity of proposed actions with respect to State Implementation Plans (SIPs) for attainment of air quality goals.

The Army Environmental Noise Management Program seeks to (1) control environmental noise to protect the health and welfare of people on- and off-post that are impacted by all Army-

produced noise sources; and (2) reduce community annoyance from environmental noise to the extent feasible, consistent with Army training and material testing activities.

The Clean Water Act (CWA) of 1977 (33 United States Code [U.S.C.] 1344) and the Water Quality Act of 1987 (33 U.S.C. 1251, *et seq.*, as amended) establish federal policy to restore and maintain the chemical, physical, and biological integrity of national waters and, where attainable, to achieve a level of water quality that provides for the protection and propagation of fish, shellfish, wildlife, and recreation in and on the water.

EO 11988, *Flood Plain Management*, requires federal agencies to take action to reduce the risk of flood damage; minimize the impacts of floods on human safety, health, and welfare; and restore and preserve the natural and beneficial values served by flood plains. Federal agencies are directed to consider the proximity of their actions to or within flood plains. Where information is unavailable, agencies are encouraged to delineate the extent of flood plains at their site.

EO 11990, *Protection of Wetlands*, requires that federal agencies provide leadership and take actions to minimize or avoid the destruction, loss, or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands.

The CWA, under Section 404, contains provisions for protection of wetlands and establishes a permitting process for activities having potential effects in wetland areas. Wetlands, riverine, and open water systems are considered waters of the U.S. and, as such, fall under the regulatory jurisdiction of the U.S. Army Corps of Engineers.

The Endangered Species Act requires federal agencies that fund, authorize, or implement actions to avoid jeopardizing the continued existence of federally-listed threatened or endangered species, or destroying or adversely affecting their critical habitat. Federal agencies must evaluate the effects of their actions through a set of defined procedures, which can include preparation of a Biological Assessment, and formal consultation with the U.S. Fish and Wildlife Service (USFWS).

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, directs federal agencies to assess the effects of their actions on minority and low-income populations within their region of influence. Agencies are encouraged to include demographic information related to race and income in their analysis of the environmental, and economic effects associated with their actions.

This EO and its accompanying memorandum have the primary purpose of ensuring that each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. It also requires federal agencies to take into account the indirect effects of their actions on the health of communities that hunt or fish for subsistence.

The EO also explicitly called for the application of equal consideration for Native American

programs. To meet these goals, the Order specified that each agency develop an agency-wide environmental justice strategy.

The Presidential Memorandum that accompanied the EO calls for a variety of actions. Four specific actions were directed at NEPA-related activities, including the following:

1. Each federal agency must analyze environmental effects, including human health, economic, and social effects, of federal actions, including effects on minority communities and low-income communities, when such analysis is required by NEPA.
2. Mitigation measures outlined or analyzed in EAs, EISs, or Records of Decision (RODs), whenever feasible, should address significant and adverse environmental effects of proposed federal actions on minority communities and low-income communities.
3. Each federal agency must provide opportunities for community input in the NEPA process, including identifying potential effects and mitigation measures in consultation with affected communities, and improving accessibility of public meetings, official documents, and notices to affected communities.
4. In reviewing other agency proposed actions under Section 309 of the Clean Air Act, the EPA must ensure that the agencies have fully analyzed environmental effects on minority communities and low-income communities, including human health, social, and economic effects.

Executive Order 13045, *Protection of Children from Environmental Health Risks and Safety Risks* (62 FR 19885-19888) requires federal agencies to ensure that their policies, programs, activities, and standards address risks to children resulting from environmental health and safety risks. The order defines environmental health and safety risks as “risks to health or to safety that are attributable to products or substances that the child is likely to come in contact with or ingest.” The EO recognizes that children are more susceptible to these risks because of their small body size relative to adults, rapid growth and development, and behavior patterns. Under EO 13045, each Federal agency:

- (a) Shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children
- (b) Shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks

The EO also established a *Task Force on Environmental Health Risks and Safety Risks to Children* to make recommendations to the President about Federal strategies for children’s environmental health and safety for the following elements:

- (a) Statements of principles, general policy, and targeted annual priorities to guide the Federal approach to achieving the goals of this order
- (b) A coordinated research agenda for the Federal Government
- (c) Recommendations for appropriate partnerships among Federal, State, local, and tribal governments, and the private, academic, and nonprofit sectors
- (d) Proposals to enhance public outreach and communication to assist families in evaluating risks to children and in making informed consumer choices

- (e) An identification of high-priority initiatives that the Federal Government has undertaken or will undertake in advancing protection of children's environmental health and safety
- (f) A statement regarding the desirability of new legislation to fulfill or promote the purposes of the EO

This Task Force was given 4 years to complete its work. On October 9, 2001, EO 13229, Amendment to EO 13045, *Extending the Task Force on Environmental Health Risks and Safety*

Risks to Children (66 FR 52013) extended the term of the Task Force from 4 to 6 years. In April 2003, the President extended the term an additional two years.

Executive Order 13175 requires consultation whenever an undertaking has the potential to significantly impact resources that may be of tribal interest.

7.2 ALTERNATIVES CONSIDERED

DODI 4715.3 and AR 200-1 direct each installation to develop an ICRMP unless granted a variance from HQDA. This EA formally addresses two alternatives: the proposed action: *Implementation of the ICRMP* (see Section 7.1) and the no-action alternative: *Continue the Existing Approach to Cultural Resource Management* (discussed below). Due to the nature of the proposed action, there are a limited number of alternatives available for consideration; either the plan will be implemented or it will not be implemented. One possible alternative is that only certain management recommendations contained within the ICRMP be implemented, but not the plan as a whole. To do this, however, would undermine objectives set for Fort Gordon to best manage cultural resources within the context of mission requirements. Additionally, selection of a portion of the recommendations would be difficult to justify. Management recommendations were selected using standards, guidelines, and best management practices for cultural resource management. Therefore, this alternative was not considered viable and was eliminated from further analysis in this EA.

The no-action alternative is prescribed by CEQ regulations and serves as a benchmark against which federal actions can be evaluated. This alternative has been equally assessed with the proposed action with respect to potential environmental and socioeconomic impacts.

This alternative refers to continuation of the existing cultural resource management approach without implementation of the proposed action. Implementation of the no action alternative means that Ft. Gordon would continue to operate under the 2005 ICRMP, and any updates to the ICRMP, would not be enacted. Current management measures for cultural resources would remain in effect and the existing cultural resource status would continue. In addition, selection of this alternative would preclude Fort Gordon from meeting the DODI 4715.16 and AR 200-1 objectives of updating an ICRMP every five years.

7.3 AFFECTED ENVIRONMENT

This section describes the affected environment for Fort Gordon.

7.3.1 Land Use

Fort Gordon encompasses approximately 55,600 acres in east central Georgia. Approximately 50,000 acres (90 percent) of Fort Gordon is used for training missions. The installation is subdivided into 49 training areas (TAs), two restricted impact areas (small arms and artillery), and two cantonment areas (main and industrial). Impact areas occupy approximately 13,000 acres and on-post maneuver and TAs occupy approximately 37,000 acres. The remaining 5,590 acres is occupied by cantonment areas which include military housing, administrative offices, community facilities, medical facilities, industrial facilities maintenance facilities, supply/storage facilities, lakes and ponds, recreational areas and forested areas. The installation operates 14 live fire ranges, one dud impact area, one demolition pit, one indoor shoot house, one convoy live fire familiarization course, two military operations on urban terrain site/building clearings, and one nuclear, biological, and chemical chamber. Training primarily consists of advanced individual signal training and unit employment of tactical communications/electronics operations. Additionally, artillery demolition, aerial gunnery, load master drop zone, and airborne troop training are conducted on Fort Gordon.

7.3.2 Climate

Fort Gordon is located approximately 200 miles southeast of the Appalachian Mountains, 200 miles northwest of the Atlantic Ocean, and 250 miles northeast of the Gulf of Mexico. Due to the influences from the warm waters of the Gulf of Mexico and Atlantic Ocean, the installation's climate consists of warm, humid summers and short mild winters. The average daily temperature for the month of January is 45° Fahrenheit (F), and 80° F for the month of July. Measurable snow is rare and remains on the ground only a short time when it does occur. The maximum amount of snow ever recorded in the area was 15 inches, occurring in February 1974. Freezing of the ground is rare in the locality, and then to only ½ to three inches in depth, for normally not more than 48 hours. The length of the growing season averages 241 days, lasting from mid-March to mid-November. The first freeze in the fall normally occurs in mid-November, with the last in the spring normally occurring in mid-March, with freezing temperatures having been observed as early as October 17 and as late as April 21. Average annual rainfall is approximately 44 inches, and is fairly evenly distributed throughout the year, with July normally recording the greatest amount, usually in the form of heavy thunderstorms (GSRC 1998).

Winds are predominantly from the southeast during the spring and summer months and westerly or northwesterly during the winter. Average relative humidity is moderately high throughout the year with a daily fluctuation in excess of 90 percent at sun-up to less than 60 percent by mid-afternoon. Severe weather, such as tornadoes and hurricanes, most often occurs during the

spring for tornadoes and severe thunderstorms, and late summer to early fall for hurricanes (GSRC 1998).

7.3.3 Air Quality

The Clean Air Act (CAA), last amended in 1990, requires the U.S. Environmental Protection Agency (EPA) to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. The CAA established two types of national air quality standards. Primary standards set limits to protect the public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards set limits to protect public welfare, including protection against decreased visibility and damage to crops, animals, vegetation, and buildings (EPA 1998). The EPA Office of Air Quality Planning and Standards (OAQPS) has set NAAQS for seven criteria pollutants (Table 7-1). The State of Georgia has adopted the NAAQS as the state's air quality criteria.

Fort Gordon is located in the Central Georgia Interior Air Quality Control Region. The EPA has classified the Augusta area, including Fort Gordon, as being a non-attainment area for NAAQS. Fort Gordon emission sources are currently covered under a Title V operating permit.

Table 7-1 National Ambient Air Quality Standards.

Pollutant	Standard Value	Standard Type
Carbon Monoxide (CO) 8-hour average 1-hour average	09 ppm (10 mg/m ³)** 35 ppm (40 mg/m ³)**	Primary Primary
Nitrogen Dioxide (NO₂) Annual arithmetic mean	0.053 ppm (100 u/m ³)**	Primary and Secondary
Ozone (O₃) 1-hour average* 8-hour average*	0.12 ppm (235 ug/m ³)** 0.08 ppm (157 ug/m ³)**	Primary and Secondary Primary and Secondary
Lead (Pb) Quarterly average	1.5 ug/m ³	Primary and Secondary
Particulate<10 micrometers (PM-10) Annual arithmetic mean 24-hour average	50 ug/m ³ 150 ug/m ³	Primary and Secondary Primary and Secondary
Particulate<2.5 micrometers (PM-2.5) Annual arithmetic mean	15 ug/m ³	Primary and Secondary
Sulfur Dioxide (SO₂) Annual average mean 24-hour average 3-hour average	0.03 ppm (80 ug/m ³)** 0.14 ppm (365 ug/m ³)** 0.50 ppm (1300 ug/m ³)**	Primary Primary Secondary

Source: Environmental Protection Agency, Aerometric Information Retrieval System, 1999.

Legend: ppm = parts per million mg/m³ = milligrams per cubic meter of air ug/m³ = micrograms per cubic meter of air

* The ozone 1-hour standard applies only to areas that were designated nonattainment when the ozone 8-hour standard was adopted in July 1997.

** Parenthetical value is an approximate equivalent concentration.

7.3.4 Noise Environment

Augusta, Georgia, located approximately 10 miles northeast of Fort Gordon, is the nearest urban area to the installation. Noise sources in Augusta represents those typical of urban areas, including vehicles, construction, aircraft, trains, and various commercial and industrial activities.

Noise impacts from these areas are minor. The remaining adjacent areas consist primarily of isolated residential areas and towns dispersed among rural landscapes. In June 2010, the U.S. Army Public Health Command provided an Operational Noise Consultation in support of three proposed range actions. The resulting map and report detailed noise contours emanating from multiple noise sources on the installation. Three noise zones were identified based on noise intensity. According to AR 200-1, the three noise zones are defined in Table 7.2 and the Noise Complaint Risk Guidelines are defined in Table 7.3.

Table 7.2 Noise Limits for Noise Zones

Noise Zone	Aviation ADNL Noise Limits (dB)	Large Calibre Weapons CDNL Noise Limits (dB)	Small Arms PK15(met) Noise Limits (dB)	Land Use Compatibility
I	< 65	<62	<87	Compatible for sensitive land uses
II	65-75	62-70	87-104	Incompatible with noise sensitive land uses (e.g. hospitals, schools, etc)
III	>75	>70	>104	Incompatible for noise sensitive activities and other land uses

Table 7.3 Risk of Noise Complaints by Noise Level

Risk of Noise Complaints	Large Caliber Weapons Noise Limits (dB) PK 15(met)
Low	<115
Medium	115-130
High	130-140
Risk of physiological damage to unprotected human ears and structural damage claims	>140

Military noise environments typically consist of three noise classes: transportation, small arms fire, and high amplitude impulsive noise. Fort Gordon's noise sources consist primarily of transportation, small arms fire, and occasional artillery/demolition and helicopter training. The incompatible use zone, Zone II, resulting from activities on Fort Gordon does extend beyond the installation boundaries or into the populated cantonment portion of the installation (U.S. Army Public Health Command 2010).

7.3.5 Geology and Soils

Fort Gordon is located near the Fall Line transition between the Piedmont Plateau and the Coastal Plains. Sedimentary rock of the region is composed primarily of two formations, the Barnwell Formation of the Jackson Group formed during the Eocene Period and the Tuscaloosa Formation of the Cretaceous Period. Geologic components associated with the Tuscaloosa Formation include phyllite, quartzose, arkosic sands, kaolin, quartz gravel, and glint kaolin (Frost 1981).

In this zone of transition, the topography ranges from the gentle undulating sand hills of the south and middle sections, to areas of steep slopes and near-bluffs adjacent to some of the streams, which are characteristically small and bordered by heavy hardwood swamp areas. The elevation of Fort Gordon ranges between 221 feet and 561 feet above mean sea level (AMSL), and the majority of the land area (35,852 acres) is between 378 feet and 489 feet AMSL.

The United States Department of Agriculture (USDA) has accomplished several soil surveys for this area. One survey was completed in April 1967 under the sponsorship of the Central Savannah River Area Planning Commission. Another partial survey was completed in September 1978. The Richmond County survey was published in 1981. The soil type names differ between the 1967 and 1981 surveys, even though the soils themselves did not change. The nomenclature and descriptions from the 1981 survey are used in this plan.

The Fall Line Sand Hills Province consists of gently sloping to steep sloping soils derived from marine sands, loams, and clays that were deposited on acid crystalline and metamorphic rocks.

The soils are predominantly sandy in character, low in organic matter and moisture holding capacity, very low in natural fertility, strongly acid, and require varying applications of lime, as well as potash and phosphate. The surface and subsurface soil drainage is excessive, requiring more frequent fertilization.

Twenty-six soil classes have been identified on the installation, the soils are further classified by slope and content detail. These classifications include such common soil series as Ailey, Bibb, Dothan, Lakeland, Lucy, Orangeburg, Osier, Troup, and Vacluse soils. These and other soil series can be grouped into associations based on similarities of soils, relief, and drainage (Frost, 1981; Paulk, 1981). Creek drainages are characterized by well-drained soils such as Troup-Vacluse-Ailey associations. Low-lying, poorly drained soils within drainages typically consists of Bibb-Osier associations. These soils are generally dominated by natural bottomland hardwood communities. Dry, upland habitats are characterized by Troup and Ailey sand series,

and are generally dominated by pine/scrub oak communities. Table 7-4 summarizes the soil series found at Fort Gordon and their characteristics (Frost 1981; Paulk 1981).

Table 7-4. Soil Series Occurring on Fort Gordon.

Soil Series	Characteristics
Troup	Deep, well drained, gently sloping sands, occurring on Coastal Plains ridgetops. Low in natural fertility, strongly acidic, rapid permeability in the surface layer. Slopes typically to 10 percent, up to 17 percent on steep slopes. Moderately suitable for loblolly, longleaf and slash pine; well suited for most urban uses; not suitable for recreational uses.
Lakeland	Deep, excessively drained soils occurring on Sand Hills ridgetops and hillsides. Low fertility, strongly acidic and very permeable. Slopes range from 0-10 percent and greater on steep slopes. Moderately suitable for common pine species. Suitable for urban uses but unsuitable for recreational uses.
Orangeburg	Deep, well-drained soils on gently sloping Coastal Plain hillsides. Medium fertility, strongly acidic and moderately permeable. Suitable for loblolly and slash pine and well suited to urban uses.
Lucy	Deep, well-drained, level to gently sloping soils on broad ridgetops and hillsides of the Coastal Plain. Low natural fertility, strongly acidic, and moderately permeable. Moderately suitable to longleaf and slash pine. Suited to urban land uses and limited recreational uses.
Dothan	Deep, well-drained, level to gently sloping soils on broad ridgetops and hillsides of the Coastal Plain uplands. Low natural fertility, strongly acidic, and moderately permeable. Well suited to loblolly and slash pine. Well suited to urban uses.
Vaocluse-Ailey Complex	Well-drained, gently sloping soils occurring on narrow ridgetops and hillsides of upland Sand Hills and Coastal Plain. Low fertility and strongly acidic. Permeability is slow in Vaocluse soils and the subsurface of Ailey soils, but rapid in the surface layer of Ailey soils. Moderately-suitable for loblolly and slash pine. Well suited to urban uses but too sandy for recreational uses.
Bibb-Osier	Poorly-drained, level, frequently flooded soils of the Coastal Plain floodplains. Strongly acidic with moderate to rapid permeability. Moderately suited to loblolly and slash pine, sweetgum and water tupelo. Poorly suited to agriculture and urban land use.

Source: Frost 1981; Paulk 1981.

7.3.6 Water Resources

7.3.6.1. Groundwater

Fort Gordon is located in the Coastal Plain hydrogeologic province of Georgia, whose principal groundwater source is the Southeastern Coastal Plain aquifer system (USGS 1990). This aquifer is composed of interbedded sand and clay of Cretaceous age and locally includes sand and clay of early Tertiary age (GDNR 1980). Natural discharge from this aquifer is into the Oconee, Savannah, and Ocmulgee rivers. Fort Gordon lies within the recharge area and the aquifer is relatively thin; therefore, there is limited storage capacity and only moderate supplies of potable water are available within the installation. Typical yields in this area range from 29,000 to 72,000 gallons per day. Wells in the aquifer supply potable water to the range, training and recreation areas. Studies of groundwater quality indicate that groundwater is quite acidic. Because of the high content of dissolved carbon dioxide, pH values can range from 3.8 to 7.4, with a mean of 5.8. The groundwater is corrosive and, over time, can damage well pumps and plumbing if left untreated. However, all samples were within EPA drinking water standards (USACE 1995).

7.3.6.2 Surface Water

Surface waters on Fort Gordon flow generally southeast toward the Savannah River. The watershed supplying Fort Gordon has been designated the Middle Savannah Watershed (EPA, 1999). The major drainages on the installation include Butler, Spirit, South Prong, Sandy Run, Boggy Gut, and Brier creeks. There are 30 lakes, ponds and reservoirs on the installation. The largest are Butler Reservoir, approximately 82 acres; Gordon Lake, approximately 37 acres; Leitner Pond, approximately 29 acres; Lower Leitner Pond, approximately 25 acres; Upper Leitner Pond, approximately 24 acres; Beaver Dam Pond, approximately 21 acres, and Union Mill Pond, approximately 20 acres. Three lakes have failed dams that have not yet been repaired.

The water distribution system on Fort Gordon was privatized in 2006 to Augusta Utilities Department (AUD). All the water within the Fort Gordon water distribution system now comes from AUD.

7.3.7 Biological Resources

7.3.7.1 Vegetation

Fort Gordon lies within the Sand Hills Fall Line transition between the Piedmont Plateau and the Coastal Plains physiographical provinces. This is a region of pine and mixed pine-hardwood habitat along with rich, productive drainage bottoms. The major vegetation community on the

installation is pine forests, which comprise approximately 50 percent of the land area. Dominant species are loblolly pine, longleaf pine, and slash pine. Historically, the longleaf pine community inhabited large expanses of Fort Gordon.

Land use changes and the subsequent regeneration of other pine species (i.e. slash and loblolly pine) within longleaf sites have reduced the coverage of the longleaf pine community throughout its natural range. On the installation, loblolly and slash pine occupy large expanses of land that was historically longleaf habitat (GSRC 2001a).

Past reforestation practices have resulted in large tracts of lands comprised of homogeneous, very dense stands of loblolly, longleaf or slash pines. Because of the lack of diversity in species composition, community structure, and the density at which the pine trees are planted, this community type offers very little valuable habitat for most wildlife species. Pine plantations comprise approximately 19 percent of the total land area on Fort Gordon (GSRC 2001a).

Mixed pine/hardwood forests comprise approximately one percent of the land area and are dominated by loblolly pine, sweetgum (*Liquidambar styraciflua*), red oak (*Quercus falcata*), and flowering dogwood (*Cornus florida*). Pine/scrub oak communities are located in the artillery impact area and comprise approximately eight percent of the land area. Dominant species are longleaf pine, loblolly pine, blackjack oak (*Quercus marilandica*), and turkey oak (*Quercus laevis*). The scrub oak community is similar in species composition as the pine/scrub community, with the exception of the pine components. The scrub oak community comprises approximately four percent of the land area and is scattered throughout the installation.

Bottomland hardwood forests comprise approximately seven percent of the land area and are dominated by white oak (*Quercus alba*), swamp chestnut oak (*Q. michauxii*), willow oak (*Q. phellos*), American beech (*Fagus grandifolia*), hickory (*Carya* spp.), red maple (*Acer rubrum*), ash (*Fraxinus* spp.), blackgum (*Nyssa sylvatica*), and yellow-poplar (*Liriodendron tulipifera*). The understory is medium to dense and consists of wax myrtle (*Myrica cerifera*), sumac (*Rhus* spp.), and honeysuckle (*Lonicera japonica* and *L. sempervirens*). Streamside (riparian) communities are closely associated with bottomland hardwood forests and comprise approximately eight percent of the land area. Dominant species of the riparian community include black willow (*Salix nigra*), river birch (*Betula nigra*), swamp cottonwood (*Populus heterophylla*), willow oak and water oak (*Quercus nigra*). Understory species include greenbrier (*Smilax* spp.), honeysuckle, and alder (*Alnus* sp.). The majority of the riparian communities are located along Brier Creek (GSRC 2001a).

Approximately one percent of Fort Gordon's land area is classified as grassland. Dominant species include broomsedge (*Andropogon virginicus*), Johnsongrass (*Sorghum halepense*) and other non-native grasses. Grasslands are found in food plots, clearings in forested areas, and in the understory of open forest types. The remaining two percent of the installation is classified as developed areas (GSRC 2001a).

7.3.7.2 Wildlife

A wide variety of wildlife species inhabit Fort Gordon, and they are dispersed throughout the various habitats on the installation. It is estimated that approximately 31 species of mammals and 67 species of reptiles and amphibians inhabit Fort Gordon (INRMP 2008).

Hunting is allowed on the installation and is regulated by the Natural Resources Branch (NRB) the Department of Public Safety (DPS) Game Wardens; and the Department of Plans, Training, Mobilization, and Security (DPTMS). Hunting seasons and bag/creel limits are established by the NRB and the Georgia Department of Natural Resources (GADNR). Common game species include white-tailed deer (*Odocoileus virginianus*), eastern fox squirrel (*Sciurus niger*), eastern gray squirrel (*Sciurus carolinensis*), eastern cottontail (*Sylvilagus floridanus*), mourning dove (*Zenaida macroura*), eastern wild turkey (*Meleagris gallopavo*), northern bobwhite (*Colinus virginianus*), and several species of ducks.

Fishing is also allowed on Fort Gordon, and several ponds on the installation are managed for recreational fishing and fish production. Fish ponds are stocked with channel catfish (*Ictalurus punctatus*), largemouth bass (*Micropterus salmoides*), and sunfish (*Lepomis* spp.). All size and creel limits are established by the NRB and GADNR.

7.3.7.3 Threatened and Endangered Species

A total of 16 animals (five birds, two mammals, five reptiles and amphibians, and four fishes) and 11 plant species listed as either threatened, endangered, or species of concern by the USFWS or the State of Georgia are known to occur on Fort Gordon. Table 7-5 lists these species, their status and describes each species' optimum habitat requirements for survival.

The RCW is the only Federally listed species known to reside on Fort Gordon. Fort Gordon's historic RCW population gradually declined in the 1980s and was considered extirpated in 1993. The last confirmed sighting was in the summer of 1990. In 1996 a single male RCW was discovered on Fort Gordon. The bird had fledged in 1995 at the Department of Energy's Savannah River Site. Currently, there are 15 active RCW clusters known at Fort Gordon. Fort Gordon actively manages for the RCW through implementation of the installation's Endangered Species Management Component (ESMC). The ESMC also provides for the management of other target species on Fort Gordon.

In addition to the RCW, one other Federally listed animal species, the wood stork (*Mycteria americana*), has been observed on the installation. The wood stork is a Federally endangered species that has been observed foraging and roosting on the installation. Because it is not known to nest on the installation, the wood stork is not considered a resident of Fort Gordon and the installation is not required to manage for this species.

Federal Species of Concern observed on Fort Gordon include, Bachman's sparrow (*Aimophila aestivalis*), southeastern American kestrel (*Falco sparverius paulus*), migrant loggerhead shrike (*Lanius ludovicianus migrans*), gopher tortoise (*Gopherus polyphemus*), southern hognose snake (*Heterodon simus*), Florida pine snake (*Pituophis melanoleucus mugitus*), Rafinesque's bigeared bat (*Corynorhinu rafinesquii*), southeastern bat (*Myotis austroriparius*), Carolina bogmint

(*Macbridea caroliniana*), Indian olive (*Nestronia umbellula*), and Pickering morning glory (*Stylisma pickeringii* var. *pickeringii*).

Currently, there is a petition to USFWS to list the eastern population of the gopher tortoise in Florida under the ESA. Listing of the gopher tortoise as a Federally protected species could negatively affect training on Fort Gordon. In an effort to prevent future listing of the gopher tortoise under the ESA, the U.S. Army is increasing management efforts for the gopher tortoise on U.S. Army installations.

State-tracked species observed on Fort Gordon include mud sunfish (*Acantharchus pomotis*), Savannah darter (*Etheostoma fricksium*), sawcheek darter (*Etheostoma serriferum*), and sailfin shiner (*Pteronotropis hypselopterus*).

Table 7-5 Federal and State Threatened and Endangered Species of Fort Gordon

Common Name	Scientific Name	Status		Description of Habitat
		Federal	State	
Birds				
Bachman's sparrow	<i>Aimophila aestivali</i>	SC	R	Abandoned fields with scattered shrubs, pines, or oaks.
Southeastern American kestrel	<i>Falco sparverius paulus</i>	SC	R	Breed in open or partly open habitats with scattered trees and in cultivated or urban areas.
Migrant loggerhead shrike	<i>Lanius ludovicianus migrans</i>	SC	Tr	Open wood, field edges.
Wood stork	<i>Mycteria americana</i>	E	E	Primarily feed in fresh and brackish wetlands and nest in cypress or other wooded swamps.
Red-cockaded woodpecker	<i>Picoides borealis</i>	E	E	Nest in mature pine with low understory vegetation; forage in pine and pine hardwood stands.
Mammals				
Southeastern bat	<i>Myotis austroriparius</i>	SC	Tr	Caves used for hibernating, maternity colonies, and summer roost
Rafinesque's big eared bat	<i>Corynorhinus Rafinesquii</i>	SC	R	Buildings in forested regions.
Reptiles and Amphibians				
Gopher tortoise	<i>Gopherus polyphemus</i>	SC	T	Well-drained, sandy soils in forest and grassy area, associated with pine overstory.
Southern hognose snake	<i>Heterodon simus</i>	SC	T	Open, sandy woods, fields, and floodplains
American alligator	<i>Alligator mississippiensis</i>	T (S/A)	NL	Marshes, swamps, rivers, farm ponds, and lakes. Nest in shallow, heavily vegetated, and secluded areas.
Florida pine snake	<i>Pituophis melanoleucus mugitus</i>	SC	Tr	Arid pinelands, sandy areas, and dry mountain ridges.
Dwarf waterdog	<i>Necturus punctatus</i>	NL	Tr	Sluggish streams with substrate of leaf litter or woody debris.
Eastern tiger salamander	<i>Ambystoma t. tigrinum</i>	NL	Tr	Isolated wetlands, pine dominated uplands, and open fields.
Fish				
Bluebarred pygmy	<i>Elassoma okatie</i>	NL	E	Heavily vegetated creeks, sloughs, and

sunfish				roadside ditches.
Savannah darter	<i>Etheostoma fricksium</i>	NL	Tr	Shallow creeks with moderate current with sandy or gravel bottoms.
Sawcheek darter	<i>Etheostoma serriferum</i>	NL	Tr	Sluggish streams and swamps with sand or mud.
Sandbar shiner	<i>Notropis scepticus</i>	R	NL	Large streams to medium-sized rivers.
Plants				
Sandy-woods chaffhead	<i>Carphphorus bellidifolius</i>	NL	Tr	Sandy Scrub
Rosemary	<i>Ceratiola ericoides</i>	NL	T	Driest, openly vegetated, scrub oak sandhills and river dunes with deep white sands of the Kershaw soil series.
Atlantic white cedar	<i>Chamaecyparis thyoides</i>	NL	R	Wet sandy terraces along clear streams and in acidic bogs.
Pink ladyslipper	<i>Cypripedium acaule</i>	NL	U	Upland oak-hickory pine forest.
Sandhill gay-feather	<i>Liatris secunda</i>	NL	Tr	Fall line sandhills.
Carolina bogmint	<i>Macbridea caroliniana</i>	SC	R	Bogs, marshes, and alluvial woods.
Indian olive	<i>Nestronia umbellula</i>	SC	R	Dry open upland forest of mixed hardwood and pine.
Sweet pitcher plant	<i>Sarracenia rubra rubra</i>	NL	T	Acid soils of open bogs, sandhill seeps, Atlantic white cedar swamps, and wet savannahs
Carolina pink	<i>Silene caroliniana</i>	NL	Tr	Granite outcrops and sandhills near the Ogeechee and Savannah Rivers.
Pickering morning glory	<i>Stylisma pickeringii var. pickeringil</i>	SC	T	Coarse white sands on sandhills near the Fall line and on a few ancient dunes along the Flint and Ohoopsee rivers.
Silky camelia	<i>Stewartia malacodendron</i>	NL	R	Steepheads, bayheads, and edge of swamps.

Key : E = Endangered, SC = Species of Concern, NL = Not Listed, U = Unusual, T = Threatened, R = Rare, Tr = Tracked, S/A=Similar of Appearance

7.3.8 Cultural Resources

Section 3.1 of this ICRMP provides a summary of the archaeological and architectural resources of Fort Gordon. Section 2 also discusses federal statutes, EOs, presidential memoranda, and DOD directives related to cultural resources, including the DOD American and Alaska Native Policy.

7.3.9 Socioeconomics

The Region of Influence (ROI) of Fort Gordon is a 6-county region called the Central Savannah River Area (CSRA). The six counties included within the CSRA are Richmond, Columbia, McDuffie, and Burke Counties in Georgia; and Aiken and Edgefield Counties in South Carolina. The City of Augusta, Georgia in Richmond County is the primary area that is affected (social and economical effects) by the installation.

The U.S. Census Bureau estimates the population of Richmond County at 199,775 for 2000. The 2000 census reported that there was a total of 73,920 households in Richmond County; the median family income for Richmond County was \$33,086. Over 37,000 persons live below the

poverty level.

The CSRA is characterized by the manufacturing and service industry. Manufacturers in the area include EZ GO, Club Car, Kimberly Clark, Amoco, Sweetheart Cups, Proctor & Gamble, International Paper, Columbia Nitrogen, Graniteville Company, and Bridgestone/Firestone. The area is also home to the south’s largest medical college, the Medical College of Georgia. The fastest growing industry in the CSRA is the service industry, which comprises approximately 70 percent of all non-agricultural employment.

7.3.10 Solid Waste

Currently, Fort Gordon operates one active solid waste landfill on the installation. This facility accepts non-hazardous demolition debris from the installation. Municipal solid waste is disposed of at the Richmond County Landfill under contract. Woody debris from ground maintenance is disposed of on-post at the mulch pit located in Training Area 17 (GSRC 2001a).

7.4 ENVIRONMENTAL CONSEQUENCES

This section describes the potential environmental impacts associated with the proposed action and the no action alternative. Direct, indirect and cumulative impacts are addressed and the analysis includes both potentially adverse and beneficial effects. The term “significant” as used here is consistent with the definition presented in 40 CFR 1508.27, which takes into account both the multiple contexts in which an action takes place (e.g., society as a whole, the affected region, and/or the locality) and the intensity of the action (e.g., the severity of the impact). As summarized in Table 7.6, there are no significant adverse impacts from either alternative, although implementation of the no action alternative would be in violation of Army regulations and less desirable from an environmental protection perspective than the proposed action.

Table 7.6 Summary of Environmental Impacts

Resource	Proposed Action	No Action
Land Use	Minor positive from the possible removal of sites from the inventory through Phase II survey	Minor restrictions of land use due to the protection of archaeological sites from ground disturbing activities
Climate	No Impact	No Impact
Air Quality	No Impact	No Impact
Noise Environment	No Impact	No Impact
Geology and Soils	No Impact	No Impact
Water Resources	Very minor and temporary sedimentation from Phase II survey next to surface water	Very minor and temporary sedimentation from Phase II survey next to surface water
Biological Resources	Very minor and temporary disturbance of wildlife habitat from Phase II survey	Very minor and temporary disturbance of wildlife habitat from Phase II survey

Cultural Resources	Positive impact in ensuring proper stewardship that would minimize the potential for inadvertent destruction of archaeological sites and other historic properties through an updated management plan	Minor negative impact as the program would continue to operate under the 2005 ICRMP which includes references to outdated army regulations and program goals
Socioeconomics	No Impact	No Impact
Solid Waste	No Impact	No Impact

7.4.1 Land Use

7.4.1.1 Proposed Action

The update of the ICRMP will cause a minor positive impact due to the potential results of Phase II excavations, subject to the availability of funding, determining NRHP site ineligibility thus removing land restrictions.

7.4.1.2 No Action

Only minor restriction of land use will occur due to the protection of archaeological sites from ground disturbing activities.

7.4.2 Climate

7.4.2.1 Proposed Action

No adverse or beneficial impacts to climate would be expected with the implementation of the Proposed Action.

7.4.2.2 No Action

No adverse or beneficial impacts to the climate would be expected with the implementation of the No Action alternative.

7.4.3 Air Quality

7.4.3.1 Proposed Action

No adverse or beneficial impacts to air quality would be expected with the implementation of the Proposed Action.

7.4.3.2 No Action

No adverse or beneficial impacts to air quality would be expected with the implementation of the No Action alternative.

7.4.4 Noise Environment

7.4.4.1 Proposed Action

No adverse or beneficial impacts to the noise environment would be expected with the implementation of the Proposed Action.

7.4.4.2 No Action

No adverse or beneficial impacts to the noise environment would be expected with the implementation of the No Action alternative.

7.4.5 Geology and Soils

7.4.5.1 Proposed Action

No adverse or beneficial impacts to geology and soils would be expected with the implementation of the Proposed Action.

7.4.5.2 No Action

No adverse or beneficial impacts to geology and soils would be expected with the implementation of the No Action alternative.

7.4.6 Water Resources

7.4.6.1 Proposed Action

Adopting the ICRMP would not adversely affect water resources. Even assuming some minor land disturbance near streams or other surface waters in the event of Phase II test excavations at potentially eligible archaeological sites, sediment runoff into these waters would be small and temporary

7.4.6.2 No Action

Updating the ICRMP would not adversely affect water resources. Even assuming some minor land disturbance near streams or other surface waters in the event of Phase II test excavations at potentially eligible archaeological sites, sediment runoff into these waters would be small and temporary

7.4.7 Biological Resources

7.4.7.1 Proposed Action

Only very minor and temporary disturbance of wildlife habitat would occur during any Phase II archaeological survey work. Protection of cultural resources could indirectly and positively affect biological resources in areas where wildlife habitat and cultural resources coincide.

7.4.7.2 No Action

Only very minor and temporary disturbance of wildlife habitat would occur during any Phase II archaeological survey work. Protection of cultural resources could indirectly and positively affect biological resources in areas where wildlife habitat and cultural resources coincide.

7.4.8 Cultural Resources

7.4.8.1 Proposed Action

Updating the ICRMP would have beneficial impacts on cultural resources at Fort Gordon, as it would ensure that proper stewardship was exercised and it would minimize the potential for inadvertent destruction of archaeological sites and other historic properties.

7.4.8.2 No Action

By not updating the ICRMP, minor negative impacts will result as the program would continue to operate under the 2005 ICRMP which includes references to outdated army regulations and program goals.

7.4.9 Socioeconomics

7.4.9.1 Proposed Action

No adverse or beneficial impacts to the socioeconomics of the CSRA would be expected with the implementation of the Proposed Action.

7.4.9.2 No Action

No adverse or beneficial impacts to the socioeconomics of the CSRA would be expected with the implementation of the No Action alternative.

7.4.10 Solid Waste

7.4.10.1 Proposed Action

No adverse or beneficial impacts to solid waste management would be expected with the implementation of the Proposed Action.

7.4.10.2 No Action

No adverse or beneficial impacts to solid waste management would be expected with the implementation of the No Action alternative.

7.4.11 Environmental Justice

Neither the Proposed Action nor No Action alternatives would result in any displacement of housing and/or businesses of low-income populations, minority populations, or Indian tribes. Therefore, the Proposed Action and No Action do not discriminate on the basis of race, color, or national origin and no minority or low-income populations reside within the project area. Both the Proposed Action and No Action are consistent with the requirements of EO 12898.

7.4.12 Protection of Children

Executive Order 13045 of April 21, 1997, "Protection of Children from Environmental Health Risks" requires each Federal agency to identify and address, as appropriate, the potential to generate disproportionately high environmental health and safety risks to children. The Proposed Action or No Action alternatives would not result in any disproportionately high

environmental health and safety risks to children.

7.4.13 Cumulative Impacts

A cumulative effect is defined as an effect on the environment that results from the incremental effect of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency or person undertakes such other actions. Cumulative effects can result from individually minor, but collectively significant actions, taking place locally or regionally over a period of time.

Implementation of the ICRMP would result in a comprehensive cultural resource management strategy for Fort Gordon that represents compliance, restoration, prevention, and conservation. The management strategy also improves the existing management approach for cultural resources at Fort Gordon and meets legal and policy requirements consistent with national cultural resources management philosophies. Implementation would be expected to initially improve existing environmental conditions at Fort Gordon. Over time, adoption of the proposed action would enable Fort Gordon to achieve its goal of maintaining the viability of archaeological and historic resources and ensuring sustainability of its mission.

7.4.14 Finding of No Significant Impact

There are no significant adverse environmental impacts associated with implementation of the proposed action. There would be only minor and temporary impacts to some wildlife species associated with any Phase II archaeological work. The protection of archaeological sites from ground disturbing activities would cause minor restrictions of land use. There is a finding of no significant impact because the cumulative impacts to cultural resources from the preferred alternative are beneficial in nature and no potential adverse cumulative impacts have been identified.

7.4.15 Consultation and Coordination

Prior to implementation of the ICRMP, consultation and comment opportunities will be made available to the GA-SHPO, Federally recognized Native American Tribes, and interested members of the local public. Section 6 of the plan details the process for such public outreach and participation, both in formalizing and establishing the plan, and in carrying out its provisions and procedures.

7.4.16 Mitigation Measures

Adopting the proposed action would result in mostly positive environmental impacts as noted in Section 8.4.14. However, there is the possibility of minor and temporary disturbance of wildlife

habitats during Phase II archaeological work. Mitigation measures such as the timing of the disturbance to minimize effects during nesting season for songbirds, or breeding season for other animals should be considered. Should any land disturbance be required near streams, then appropriate sediment/erosion control practices (physical barriers such as silt fences rapid revegetation with native flora) should be considered to prevent contamination of surface waters. A separate NEPA evaluation will be conducted for each undertaking and specific mitigation measures will be developed as appropriate.

7.4.17 List of Preparers

This EA was prepared in 2005 by Dr. Brian Thomas of TRC. He served as the principal author. Updates were made in 2011 by Robert Drumm, Renee Lewis, and Heidi Helmlinger.

Table 7-7. List of Preparers.

Name	Company	Responsibility
Brian Thomas	TRC	Project manager and primary author of 2005 ICRMP EA
Renee Lewis	CALIBRE; on site contractor with Fort Gordon Natural Resource Branch/Cultural Resource Program	Primary updater of 2011 ICRMP and EA
Heidi Helmlinger	CALIBRE; on site contractor with Fort Gordon Natural Resource Branch/NEPA Program	Updater of 2011 ICRMP EA

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APPENDIX A: GLOSSARY OF KEY TERMS

This appendix provides brief explanations of several key terms that are utilized in cultural resource laws and regulations outlined in the ICRMP.

Adverse Effect: An undertaking has an *adverse effect* on a historic property when it diminishes the integrity of the property location, design, setting, materials, workmanship, feeling, association, or information content. Adverse effects include (but are not limited to):

- Physical destruction, damage, or alteration to all or part of the property
- Isolation of the property from its setting
- Introduction of elements that alter the setting or that are out of character with the current setting
- Neglect of a property, resulting in its deterioration or destruction
- Transfer, sale, or lease of a property

Advisory Council for Historic Preservation (Council): Established by the National Historic Preservation Act (NHPA) of 1966 to advise the President and Congress, to encourage private and public interest in historic preservation, and to comment on federal agency action under Section 106 of the NHPA.

Archaeological Collection: Defined in 36 CFR 79 as material remains that are excavated or removed during a survey, excavation, or other study of a prehistoric or historic resource and associated records that are prepared or assembled in connection with the survey, excavation, or other study. It is important to note that the records associated with the archaeological artifacts are considered part of the collection and subject to this regulation. Such associated records include documentation of efforts to locate, evaluate, record, study, preserve, or recover a prehistoric or historic resource and may contain field notes, photographs, maps, artifact inventories, reports, and archival documents associated with archaeological investigations.

Archaeological Site: Archeological sites are the locations of past human activity, defined according to local standards by state or federal agency archeologists. Sites may contain artifacts (i.e., things made, modified, or used by humans), features (i.e., relatively immovable remains of human activity, such as a fire hearth), and other evidence of occupation (e.g., chemical alteration of the soil). If archeological materials are found in the place where their original users left them, they are said to be “in situ” and the site has not been disturbed. If they have been disturbed by natural processes (e.g., erosion) or human activity (e.g., construction, deliberate vandalism) they are said to have been “re-deposited.” Sites that have not been disturbed have the greatest scientific value. This is because the relationship between associated archeological material and their vertical and horizontal position can yield important information about the past.

Area of Potential Effect (APE): 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. This area always includes the actual site of the undertaking, but may also include other areas where the undertaking will cause changes in land use, traffic patterns, or other aspects that could affect historic properties.

Artifacts: Discrete, and generally portable, artifacts include any objects used or manufactured by humans. Individual artifacts are a class of cultural resources generally not eligible for inclusion to the National Register of Historic Places (NRHP) with the exception of specific objects of great historical importance.

Categorical Agreement: devised to address activities that could result in the need for consultation under NAGPRA [43 CFR Part 10.5(f)]. Such agreements should be devised to address concerns and issues, and to outline procedures and protocols to follow when specific consultation needs arise.

Council Comment: The Council may choose to participate in the Section 106 review process by signing an MOA, by reviewing and commenting on an MOA, or (in rare instances) if no agreement between an agency and the SHPO can be reached and consultation is terminated, by issuing comments directly to the agency.

Criteria of Effect: Any undertaking has the potential to affect a historic property. For the purposes of Section 106, the agency is responsible for determining whether there may be any historic properties affected by the undertaking and if so, whether the effect will be “adverse” or “not adverse” (see *no adverse effect* and *adverse effect*). This application is known as determining the “criteria of effect.”

Cultural Item: As defined by NAGPRA, human remains and associated funerary objects, unassociated funerary objects (at one time associated with human remains as part of a death rite or ceremony, but no longer in possession or control of the Federal agency or museum), sacred objects (ceremonial objects needed by traditional Native American religious leaders for practicing traditional Native American religions), or objects of cultural patrimony (having ongoing historical, traditional, or cultural importance central to a Native American group, rather than property owned by an individual Native American, and which, therefore, cannot be alienated, appropriated, or conveyed by any individual of the group).

Cultural Landscape: Any geographic area which possesses a notable human relationship with the land and tangible physical features.

Cultural Resource: A cultural resource is any place, site, building, or object, or collection of these, that was built or fashioned by people. Fossils and naturally occurring geological specimens are not cultural resources. Ordinarily, cultural resources are defined as more than 50 years old. Not all cultural resources are considered to be significant under the NHPA (see *Historic Property*). Cultural resources include the following types:

- A *district* is a geographically definable area with a concentration of cultural resources that are united by past events, or aesthetically by plan or physical development.
- A *site* is the location of a prehistoric or historic event or occupation, or a structure that contains historical or archeological value.
- A *building* is a structure created to shelter human activities such as a house, jail, church, barn, or factory.
- A *structure* is an engineering edifice designed to aid human activities, such as a road, bridge, or canal.
- An *object* is a moveable artifact of functional, aesthetic, cultural, historic, or scientific value, such as a cannon, a church bell, or a prehistoric basket.

Cultural Resources Manager (CRM): The Fort Gordon Garrison Commander must designate an individual to coordinate the installation management of cultural resources. This person must coordinate with other installation staff early in the planning of projects and activities that may affect cultural resources. Specific duties are defined by the installation ICRMP. The NEPA coordinator in ENRMO currently acts as the CRM.

Determination of Eligibility: Under the NHPA, a property is evaluated for its eligibility for inclusion to the NRHP by determining if the following:

- Is associated with significant historical events (Criterion A)
- Is associated with significant historical persons (Criterion B)
- Embodies the distinctive characteristics of a type, period, or method of construction, or is the work of a master, or has high artistic values (Criterion C)
- Has yielded, or is likely to yield, important information about history or prehistory (Criterion D)

NRHP eligibility must be determined solely on the historical, architectural, cultural, and/or scientific importance of a property. Management issues and mission requirements may not be considered. Ordinarily, properties that have achieved significance within the last 50 years are not eligible, unless they are of “exceptional importance.” Eligible properties must be cared for by federal agencies as if they were already listed on the NRHP, and are therefore afforded the same protection as listed properties.

Historic Context: Historians, architectural historians, folklorists, archeologists, and anthropologists use different words to describe “historic context” (e.g., trend, pattern, theme, affiliation), but they all refer to the same concept. A historic context is a broad pattern of historical development in a community or its region that may be represented by historic resources. For purposes of the NRHP, a historic context provides information about historic trends linked by an important theme in the prehistory or history of a community, state, or nation during a particular period of time. To evaluate a property within its historic context it is necessary to determine the following:

- What facet of local, state, or national prehistory or history is represented
- Whether that facet is historically significant
- Whether the property has relevance to the significance of the historic context

- How the property illustrates that historic context
- Whether the property possesses the physical features necessary to convey the aspect of prehistory or history with which it is associated

Historic District: A historic district is a geographically definable area with a concentration of cultural resources united by past events, or aesthetically by plan or physical development. Historic districts are defined by one or more historic contexts/themes. Historic districts contain *contributing elements* (i.e., individual buildings and structures) that contribute to the historic theme(s). Districts may also contain *noncontributing elements*, which are buildings and/or structures located within the boundaries of the district, but which fail to contribute to the historic theme(s) that qualify the district for NRHP listing.

Historic Property or Historic Resource: As defined by the NHPA, is any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register. The term includes artifacts, records, and remains that are related to and located in such properties. Historic properties may be associated with prehistoric and/or historic time periods. The term includes properties of traditional religious and cultural importance (traditional cultural properties) that are eligible for the National Register because of their association with the cultural practices or beliefs of an Indian tribe or Native Hawaiian organization. The term “eligible for inclusion in the National Register” includes both properties formally determined as such by the Secretary of the Interior and all other properties that meet National Register listing criteria.

Interested Parties: Any local government, Indian tribe, property owner, or organization that has a legitimate interest in a specific undertaking(s) or historic property(s).

Isolated Occurrences: Places where one or only a few artifacts of a single artifact class (e.g., stone tool, faunal remains, pottery) are present are termed isolates, or isolated occurrences (IO). These may represent either re-deposited archeological material, the remains of what was once a site that has been disturbed, or the location of some past activity that left sparse material remains. Examples of this last instance include a single arrow point that missed its target, a camp occupied for a very short time, or a lost object. Because of their minimal information content, isolated occurrences are rarely eligible for inclusion to the NRHP.

Keeper of the Register (Keeper): The individual who has been delegated authority by the National Park Service (NPS), on behalf of the Secretary of the Interior, to list properties and to determine their eligibility for the NRHP.

Localities: Archeological sites that have been identified on the basis of collections or documentary research but that have not been professionally documented (in the field) by professionals are referred to as “localities.” Examples include places where artifact collectors have found archeological specimens and sites of past structures identified on historic maps. Because localities lack professional inspection, they have not been evaluated for their eligibility for inclusion to the NRHP.

Memorandum of Agreement (MOA): A formal agreement containing the results of discussions between the federal agency, the SHPO, the Council (per request), and interested parties (in certain situations). The MOA documents mutual agreement of facts, intentions, procedures, and parameters for future agency actions. The MOA is usually generated as part of the Section 106 process to avoid or mitigate adverse effects to historic properties.

Mitigation: The process of avoiding or diminishing adverse effects that an undertaking may cause to historic properties. The procedures and parameters for mitigation are stipulated in an MOA and may include the following:

- Avoiding the effect altogether by canceling or relocating the action
- Reducing or eliminating the effect over time by preservation and maintenance
- Limiting the magnitude of the undertaking
- Repairing, rehabilitating, or restoring the property
- Recovering and recording information from properties that may be destroyed or damaged
- Compensating for effect by providing substitute resources

National Register Nomination Form: A legal document submitted to the Keeper and prepared following the technical requirements of the NPS. The form includes data, text maps, and photographs and must be prepared according to standards generally accepted by academic historians, architectural historians, and archeologists.

National Register of Historic Places (NRHP): Created by the NHPA, the NRHP is the master inventory of the known historic properties of the nation, maintained by the NPS on behalf of the Secretary of the Interior. Listings include buildings, districts, structures, sites, and objects that possess historical, architectural, engineering, archeological, and/or cultural significance.

Programmatic Agreement (PA): A formal agreement between the agency, the SHPO, and sometimes the Council to modify and/or replace the Section 106 consultation process for numerous and/or routine undertakings.

Sacred Site: Any specific, discrete, narrowly delineated location of Federal Lands that is identified by an Indian Tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonially used by, an Indian religion; provided that the tribe or appropriately authorized representative of an Indian religion has informed the agency of the existence of such a site (EO 13007).

Section 106 Consultation: The procedure for compliance with the NHPA in which the agency requests the comments of the SHPO when an undertaking may affect a historic property.

State Historic Preservation Officer (SHPO): Appointed by the Governor, the SHPO is an official who represents state interests in Section 106 review.

Traditional Cultural Property: A property that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in the community history, and (b) are important in maintaining the continuing cultural identity of the community. Examples include the following:

- A location associated with the traditional beliefs of a Native American group about its origins, cultural history, or the nature of the world
- A rural community whose organization, buildings and structures, or patterns of land use reflect the cultural traditions valued by its long-term residents
- An urban neighborhood that is the traditional home of a particular cultural group, and that reflects its beliefs and practices
- A location where Native American religious practitioners have historically gone, and are known or thought to go today, to perform ceremonial activities in accordance with traditional cultural rules of practice
- A location where a community has traditionally carried out economic, artistic, or other cultural practices important in maintaining its historic identity

Undertaking: As defined by the NHPA, an undertaking is any project, action, activity, or program that is under the direct or indirect jurisdiction of a federal agency and that has the potential to have an effect on a historic property. Examples of undertakings include (but are not limited to) construction, rehabilitation, repairs, demolition, licenses, permits, loans, loan guarantees, grants, and federal property transfers.

APPENDIX B. LIST OF ELIGIBLE AND POTENTIALLY ELIGIBLE SITES AND BUILDINGS

ARCHAEOLOGICAL SITES ON FORT GORDON

ELIGIBLE SITES

9CB81	9RI108	9RI374/ 9RI123
9CB96	9RI122	9RI430
9CB106	9RI135	9RI475
9CB114	9RI202	9RI488
9CB117	9RI251	9RI489
9MF20	9RI256	9RI605
9MF57	9RI281	9RI606
9MF71	9RI295	9RI607
9MF73	9RI316	9RI608
9MF114	9RI346	9RI684
9RI96	9RI348	9RI920
9RI97	9RI352	9RI930
9RI98	9RI365	
9RI105	9RI366	

POTENTIALLY ELIGIBLE SITES

9JF16	9JF132	9MF115	9RI549
9JF19/20	9JF147	9MF121	9RI565
9JF21	9MF9	9MF139	9RI579
9JF22	9MF13/14	9MF148	9RI580
9JF23	9MF21	9RI93	9RI587
9JF24	9MF24	9RI99	9RI589
9JF25/26	9MF25	9RI102	9RI591
9JF27/28	9MF26	9RI107	9RI594
9JF29	9MF27	9RI118	9RI595
9JF31	9MF28	9RI132	9RI610
9JF49	9MF72	9RI138	9RI612
9JF65	9MF75	9RI389	9RI618
9JF75	9MF81	9RI392	9RI626
9JF94	9MF86	9RI408	9RI636
9JF96	9MF87	9RI410	9RI637
9JF99	9MF90	9RI412	9RI638
9JF100	9MF91	9RI413	9RI644
9JF101	9MF100	9RI414	9RI662
9JF122	9MF102	9RI416	9RI666
9JF123	9MF104	9RI418	9RI670
9JF125	9MF113	9RI419	9RI673

9RI709	9RI806	9RI834	9RI925
9RI712	9RI807	9RI835	9RI928
9RI754	9RI808	9RI857	9RI970
9RI760	9RI820	9RI863	9RI974
9RI782	9RI825	9RI890	9RI977
9RI784	9RI827	9RI905	9RI994
9RI786	9RI831	9RI914	
9RI793	9RI832	9RI919	

BUILDINGS AND STRUCTURES ON FORT GORDON

ELIGIBLE BUILDINGS

33500

POTENTIALLY ELIGIBLE (BUILDINGS THAT NEED TO BE REEVALUATED)

300	24411	29809
302	24412	29810
303	24413	29811
310	24414	29813
24401	25801	29815
24402	25810	29816
24403	25910	29817
24404	27801	29818
24405	29801	29819
24406	29802	32100
24407	29803	36300
24408	29805	36302
24409	29807	44401
24410	29808	45400

WWII TEMPORARY BUILDINGS

2120	2401
2224	2402
2226	G003
2228	

CAPEHART-WHERRY FAMILY HOUSING PROGRAM COMMENT

2	12	18
3	13	19
8	14	20
9	15	21
10	16	22
11	17	23

24	27	30
25	28	
26	29	

UPH PROGRAM COMMENT

19730	25411	25708	29703
19731	25412	25715	29704
19733	25413	25716	29705
19735	25414	25717	29707
19737	25420	25718	29708
19750	25421	25720	29715
21707	25422	25721	29716
21708	25425	28410	29720
21709	25426	28411	29721
21716	25427	28413	33800
21720	25428	28417	39005
24404	25429	28425	39010
24406	25430	28426	40005
24407	25702	28430	40007
24412	25703	28432	40121
24413	25704	28433	40122
24414	25705	28435	40123
25410	25707	29702	40127

AMMUNITION STORAGE PROGRAM COMMENT

8000	8120
8010	8130
8020	8140
8040	8150
8050	8160
8060	8170
8070	8180
8080	8190
8090	8200
8100	8210
8110	

APPENDIX C: LIST OF TRIBAL CONSULTATION CONTACTS

ALABAMA-QUASSARTE

Mr. Tarpie Yargee, Chief
Alabama-Quassarte Tribal Town
P.O. Box 187
Wetumka, OK 74883

Ms. Augustine Asbury, Cultural Heritage Office Director
Alabama-Quassarte Tribal Town
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Wetumka, OK 74883

CATAWBA

Mr. Donald Rodgers, Chief
Catawba Indian Tribe
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Catawba, SC 29704

CHEROKEE NATION OF OKLAHOMA

Mr. Chadwick Smith, Principal Chief
Cherokee Nation of Oklahoma
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Tahlequa, OK 74465

Mr. Richard L. Allen, NAGPRA Contact
Cherokee Nation of Oklahoma
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Tahlequa, OK 74465-0948

CHICKASAW NATION OF OKLAHOMA

Mr. Bill Anoatubby, Governor
Chickasaw Nation of Oklahoma
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Ada, OK 74821-1548

Ms. Gingy Nail, NAGPRA Contact
Chickasaw Nation, Oklahoma
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EASTERN BAND OF CHEROKEE INDIANS

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Eastern Band of Cherokee Indians

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Cherokee, NC 28719

Ms. Clara Wahnetta, NAGPRA Contact
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KIALEGEE

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Kialegee Tribal Town
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Mr. Henry Harjo, Environmental Director
Kialegee Tribal Town
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Mr. Buford L. Rolin, Chairperson
Poarch Band of Creek Indians
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THLOPTHLOCCO

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Mr. Charles Coleman, NAGPRA Representative
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UNITED KEETOOWAH BAND OF CHEROKEE INDIANS

Mr. George Wickliffe, Chief
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Ms. Lisa C. Stopp, THPO
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APPENDIX D: SECRETARY OF INTERIOR'S STANDARDS FOR TREATMENT OF HISTORIC STRUCTURES

PRESERVATION

The act or process of applying measures necessary to sustain the existing form, integrity, and materials of a historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

Standards for Preservation

1. A property shall be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property shall be protected and, if necessary, stabilized until additional work may be undertaken.
2. The historic character of a property shall be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features shall be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
4. Changes to a property that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. The existing condition of historic features shall be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material shall match the old in composition, design, color, and texture.
7. Chemical or physical treatments, if appropriate, shall be undertaken using the gentlest means possible. Treatments that cause damage to historic materials shall not be used.
8. Archaeological resources shall be protected and preserved in place. If such resources must be disturbed, mitigation measures shall be undertaken.

Preservation as Treatment

When the property's distinctive materials, features, and spaces are essentially intact and thus convey the historic significance without extensive repair or replacement; when depiction at a particular period of time is not appropriate; and when a continuing or new use does not require

additions or extensive alterations, Preservation may be considered as a treatment. Prior to undertaking work, a documentation plan for Preservation should be developed.

REHABILITATION

The act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

Standards for Rehabilitation

1. A property shall be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property shall be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property shall be avoided.
3. Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, shall not be undertaken.
4. Changes to a property that have acquired historic significance in their own right shall be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property shall be preserved.
6. Deteriorated historic features shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and where possible, materials. Replacement of missing features shall be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, shall be undertaken using the gentlest means possible. Treatments that cause damage to historic materials shall not be used.
8. Archaeological resources shall be protected and preserved in place. If such resources must be disturbed, mitigation measures shall be undertaken.
9. New additions, exterior alterations, or related new construction shall not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and shall be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction shall be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Rehabilitation as a Treatment

When repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, Rehabilitation may be considered as a treatment. Prior to undertaking work, a documentation plan for Rehabilitation should be developed.

RESTORATION

The act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

Standards for Restoration

1. A property shall be used as it was historically or be given a new use which reflects the property's restoration period.
2. Materials and features from the restoration period shall be retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period shall not be undertaken.
3. Each property shall be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period shall be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
4. Materials, features, spaces, and finishes that characterize other historical periods shall be documented prior to their alteration or removal.
5. Distinctive materials features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period shall be preserved.
6. Deteriorated features from the restoration period shall be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature shall match the old in design, color, texture, and, where possible, materials.
7. Replacement of missing features from the restoration period shall be substantiated by documentary and physical evidence. A false sense of history shall not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.
8. Chemical or physical treatments, if appropriate, shall be undertaken using the gentlest means possible. Treatments that cause damage to historic materials shall not be used.
9. Archaeological resources affected by a project shall be protected and preserved in place. If such resources must be disturbed, mitigation measures shall be undertaken.
10. Designs that were never executed historically shall not be constructed.

Restoration as a Treatment:

When the property's design, architectural, or historical significance during a particular period of time outweighs the potential loss of extant materials, features, spaces, and finishes that characterize other historical periods; when there is substantial physical and documentary evidence for work; and when contemporary alterations and additions are not planned, Restoration may be considered as a treatment. Prior to undertaking work, a particular period of time, i.e., the restoration period, should be selected and justified, and a documentation plan for

Restoration developed.

RECONSTRUCTION

Reconstruction is defined as the act or process of depicting, by means of a new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

Standards for Reconstruction

1. Reconstruction shall be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.
2. Reconstruction of a landscape, building, structure or object in its historic location shall be preceded by a thorough archaeological investigation to identify and evaluate those features and artifacts that are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures shall be undertaken.
3. Reconstruction shall include measures to preserve any remaining historic materials, features, and spatial relationships.
4. Reconstruction shall be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability or different features from other historic properties. A reconstructed property shall re-create the appearance of the non-surviving historic property in materials, design, color, and texture.
5. A reconstruction shall be clearly identified as a contemporary re-creation.
6. Designs that were never executed historically shall not be constructed.

Reconstruction as a Treatment

When a contemporary depiction is required to understand and interpret a property's historic value (including the re-creation of missing components in a historic district or site); when no other property with the same associative value has survived; and when sufficient historical documentation exists to ensure an accurate reproduction, Reconstruction may be considered as a treatment. Prior to undertaking work, a documentation plan for Reconstruction should be developed.

More detailed information on the Secretary's Standards may be obtained at:
<http://www2.cr.nps.gov/tps/tax/rhb/> (2004).

APPENDIX E. NATION-WIDE AGREEMENT DOCUMENTS

PROGRAMMATIC MEMORANDUM OF AGREEMENT

AMONG

THE UNITED STATES DEPARTMENT OF DEFENSE

THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

AND THE

NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS

WHEREAS, the Department of Defense (DoD) has been directed by United States Senate Armed Services Committee Report 97-440 to the Military Construction Authorization Bill for 1983 to demolish World War II (1939-1946) temporary buildings (buildings); and

WHEREAS, these buildings were not constructed to be permanent facilities and were intended to be demolished; and

WHEREAS, DoD has determined that these buildings may meet the criteria of the National Register of Historic Places; and

WHEREAS, DoD has determined that its program of demolition of these buildings (program) may have an effect on their qualities of significance and has requested the comments of the Advisory Council on Historic Preservation (Council) pursuant to Section 106 of the National Historic Preservation Act, as amended, (16 U.S.C. 470f) and its implementing regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800).

NOW, THEREFORE, DoD, the National Conference of State Historic Preservation Officers (NCSHPO), and the Council agree that the Program will be carried out in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

I. DoD will ensure that the following actions are carried out:

A. In consultation with the Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER) (National Park Service, Washington, DC), DoD will develop documentation that includes:

1. A narrative overview of WW II military construction establishing the overall historical context and construction characteristics of each major type of building and including:

a. Explanation of the origins and derivations of the construction techniques and designs.

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b. Chronology that summarizes the political and military decisions that affected scheduling, locations, quantity, design, and construction techniques. Photocopies shall be made of all military manuals used to guide significant aspects of design or construction.

c. Summary statements of major installations' WW II development including site plans, lists of buildings, photocopies of appropriate photographs, and evaluations of the significance of the various building types and groups.

2. Documentation of one example of all major building types that includes: drawings (title sheet, floor plans, sections, elevations, and isometrics of framing systems and other pertinent construction details), photographs (perspective corrected, large format negative and contact print), and appropriate explanatory data. All documentation shall meet HABS/HAER Standards for format and archival stability.

3. Submission of the above documentation to HABS/HAER, for deposit in the Library of Congress, not later than three years from the date of this agreement.

4. Development of the above documentation will be undertaken with periodic reviews by HABS/HAER to ensure that completed documentation will meet HABS/HAER Standards.

B. In consultation with the Council and the NCSHPO, DoD will select some examples of building types or groups to treat in accordance with historic preservation plans (HPP), until such time as demolished or removed from DoD control. The HPPs will be submitted to the Council and the NCSHPO within three years from the date of this agreement. Work done in accordance with the HPPs will require no further review by a SHPO or the Council.

C. All buildings that are identified within sixty days of the Federal Register publication of this Agreement by organizations and individuals will be considered by DoD in its selection of examples to be documented and/or treated in accordance with Stipulations A and B above.

D. Until the documentation program is completed and HPPs have been developed for the representative sample of building types and groups, DoD will continue its current program of building demolition with caution, avoiding disposal of obviously unique and well-preserved, original buildings that are not documented.

II. NCSHPO agrees to:

A. Assist the appropriate SHPO in informing DoD within sixty days of the Federal Register publication of this agreement of buildings that they wish to have considered in the selection of examples to be documented and/or treated in accordance with Stipulations I.A and I.B.

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B. Represent all SHPOs in the consultation on a selection of examples of buildings to be treated in accordance with Stipulation I.B.

III. If any of the signatories to this Agreement determines that the terms of the Agreement cannot be met or believes that a change is necessary, the signatory will immediately request an amendment or addendum to the Agreement. Such an amendment or addendum will be executed in the same manner as the original Agreement.

EXECUTION of this Agreement evidences that DoD has afforded the Council a reasonable opportunity to comment on its program of disposal of temporary WW II buildings and that DoD has taken into account the effects of this program on historic resources.

John M. Bule 7/2/86
Executive Director, Advisory Council
on Historic Preservation

Robert G. Ste
Department of Defense

Walter D. Rober 7/7/86
Chairman
Advisory Council on Historic
Preservation

Department of Army

Department of Navy

Charles E. Lee 6/6/86
President
National Conference of
State Historic Preservation
Officers

U. S. Marine Corps

Robert A. Cooper 5/13/86
Historic American Buildings Survey/
Historic American Engineering Record

Department of Air Force

This section of the FEDERAL REGISTER contains documents other than rules or proposed rules that are applicable to the public. Notices of hearings and investigations, committee meetings, agency decisions and rulings, delegations of authority, filing of petitions and applications and agency statements of organization and functions are examples of documents appearing in this section.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

Program Comment for Capehart and Wherry Era Army Family Housing and Associated Structures and Landscape Features (1949–1962)

AGENCY: Advisory Council on Historic Preservation.

ACTION: Notice of approval of Program Comment on Army Capehart and Wherry Era Housing.

SUMMARY: On May 31, 2002, the Advisory Council on Historic Preservation approved a Program Comment that facilitates the Army's compliance with the National Historic Preservation Act with regard to its management of its inventory of Capehart and Wherry Era family housing and associated structures and landscape features.

DATES: The Program Comment goes into effect on June 7, 2002.

FOR FURTHER INFORMATION CONTACT:

Address all comments concerning this Program Comment to David Berwick, Army Affairs Coordinator, Advisory Council on Historic Preservation, 1100 Pennsylvania Avenue, NW., Suite 809, Washington, DC 20004. Fax (202) 606–8672. dberwick@achp.gov.

SUPPLEMENTARY INFORMATION: Section 106 of the National Historic Preservation Act, 16 U.S.C. 470f, requires Federal agencies to consider the effects of this undertakings on historic properties and provide the Advisory Council on Historic Preservation (“Council”) a reasonable opportunity to comment with regard to such undertakings. The Council has issued the regulations that set forth the process through which Federal agencies comply with these duties. Those regulations are codified under 36 CFR part 800 (“Section 106 regulations”).

The section 106 regulations, under 36 CFR 800.14(e), provide that an agency

may request the Council for a “Program Comment” allowing it to comply with section 106 for a category of undertakings in lieu of conducting a separate review for each individual undertaking under the regular process.

I. Background

According to the requirements for obtaining a Program Comment, the Army formally requested the Council comment on Capehart and Wherry Era Army family housing and associated structures and landscape features in lieu of requiring separate reviews under sections 800.4 through 800.6 of the section 106 regulations for each individual undertaking. The Army identified the category of undertakings as maintenance and repair; rehabilitation; layaway and mothballing; renovation; demolition; demolition and replacement; and transfer, sale or lease out of Federal control, affecting Army family housing built between 1949 and 1962 and termed “Capehart and Wherry.” The Army also specified the likely effects that these management actions would have on historic properties and the steps the Army would take to ensure that the effects are taken into account. The Army included in their request to the Council the public comments that it received from a 30-day public comment opportunity provided through an earlier notice (67 FR 2644, January 18, 2002).

The Council subsequently published a notice of intent to issue the Program Comment (67 FR 12966, March 20, 2002) and notified State Historic Preservation Officers (“SHPOs”), the National Conference of State Historic Preservation Officers (“NCSHPO”), Tribal Historic Preservation Officers (“THPOs”), and the National Association of Tribal Historic Preservation Officers, and requested their views on the Army's proposed Program Comment.

During its May 31, 2002 business meeting, the Council membership (with the Department of Defense recusing itself) voted unanimously to approve and issue the Program Comment found at the end of this notice. The vote was 19 in favor of approving and issuing the Program Comment and no votes against, with the Department of Defense abstaining.

Neither the Council nor the Army have engaged in the particularized consultation with Indian Tribes and

Native Hawaiian organizations, pursuant to 36 CFR 800.14(e)(4), since such consultation does not seem to be warranted. All Army actions considered under this Program Comment will be undertaken on Army property. The Program Comment will not have consequences for historic properties of religious and cultural significance, regardless of location, to any Indian tribe or Native Hawaiian organization since any Capehart and Wherry actions which would affect these types of properties are specifically excluded under the Program Comment.

II. Response to Public Comments

At the end of the 30-day comment period, only four comments had been filed: NCSHPO, the New Jersey SHPO, the National Trust for Historic Preservation (“Trust”), and the Department of Housing and Urban Development. The following Council responses reflect significant comments and the manner in which the Council has modified the Program Comment to respond to these public comments. The public comments are printed in bold typeface, while the Council response follows immediately in normal typeface:

The Army's proposal will, in effect, exempt one property type from any and all future compliance with section 106. The Program Comment process is not an exemption. The Program Comment reflects what the Army must follow to be in compliance with section 106.

The period of significance for Capehart and Wherry Housing is less than fifty years old. For most properties the passage of time is considered to be essential in order to gain scholarly perspective. While the National Register criteria allow for properties of exceptional significance to be eligible for the Register prior to this 50-year benchmark, the Council believes that Capehart Wherry properties would never meet the significance test for this category of exceptional significance. Since these properties are now on the cusp of meeting the 50-year benchmark, we believe it is appropriate for the Army to take management action, which would reduce their administrative cost of managing these resources, to comply with Section 106 in advance of meeting the 50-year threshold. The Council supports proactive agency planning in order to reduce administrative costs and burdens.

Conclusions reached about the non-significance of properties that are less than fifty years old are inherently suspect. The Council's notice of intent states that "The Army considers its inventory of Capehart and Wherry properties, including any associated structures and landscape features, to be eligible for the National Register of Historic Places for the purposes of section 106 compliance."

The Army's plans should receive detailed consideration, possibly by the Council as a whole. The Council's Federal Agency Program Committee reviewed the Program Comment and provided recommendations to the Council membership for its deliberation and vote at the May 31, 2002, business meeting. As stated above, at that meeting, the Council membership discussed the Program Comment and unanimously voted to approve and issue it.

SHPOs from states with significant inventories of Capehart Wherry era housing should be invited to participate in the development of treatment plans. The Council and the Army provided all SHPOs and NCSHPO ample opportunity to comment on the proposed treatment plans detailed in the Program Comment. That resulted in the receipt of comments from only one SHPO (New Jersey) and NCSHPO. Both comments were closely considered in the final drafting of the Program Comment. The consultation met the requirements of the section 106 regulations for the issuance of a Program Comment.

While documentation of the affected resources may be one effective treatment, preservation of significant examples needs to be considered also. The Program Comment has been modified to allow for identification and preservation of properties of particular importance for continued use as military housing within the funding and mission constraints of the Army.

The Advisory Council needs more information on the resource type affected, such as information about representative individual examples or types and information about groups of resources as they exist today on military installations. The revised and expanded context study will provide more detailed information on individual examples of the types of Capehart and Wherry housing which exist at each installation. This information will be used by the Army to prepare the design guidelines that will be used by installations in future planning efforts that affect Capehart and Wherry communities.

The Council should insure that Capehart Wherry communities are

evaluated within a comprehensive context, including evaluating significance within the context of local and state significance, Criteria for Evaluation B (related to individuals of historic importance) and C (work of a master). Because the housing program was not uniform across all installations, a post-by-post evaluation needs to be made for groups of resources in order to evaluate their significance. The revised and expanded context study will specifically address the importance of historically important builders, developers and architects that may have been associated with design and construction of Capehart and Wherry Era housing developments at specific Army installations.

The potential for secondary effects on National Register listed or eligible property that may be adjacent to Capehart Wherry era housing is not consider in this proposal, and archaeology is not considered either. Ground disturbing activities on Army installations should be evaluated on an individual basis. The Program Comment specifically states that it does not apply to the following properties historic properties: (a) Archaeological sites; (b) properties of traditional religious and cultural significance to federally recognized Indian tribes or Native Hawaiian organizations; and/or (c) historic properties other than Army Capehart and Wherry Era housing, associated structures and landscape features. This is found in section III, Applicability.

The Council's regulations emphasize public participation. We do not believe the spirit of the Council's regulations have been addressed by one Federal Register notice. We disagree. The Council's regulations allow agencies to use their own public review processes, including NEPA, in complying with the public involvement requirements under the Council's regulations. The general public had an opportunity to respond to comments under the Army's NEPA document and again through the Council's notice of intent process. There were no general public comments received by either the Army or the Council during these public review processes. We believe that the non-response by the general public reflects its lack of interest in these types of properties, especially as they relate to military installations.

Would the program comment affect the Army's responsibilities under section 110 of the National Historic preservation Act? Section 110(a)(2)(E) requires agency's procedures for compliance with Section 106 to be consistent with the Council's

regulations and provide a process for identification, evaluation, and consultation regarding the means by which adverse effects are considered. This Program Comment was issued and approved by the Council pursuant to the Council's section 106 regulations.

The Army's proposal includes no commitment that any of these useful documents (i.e., context study, design guidelines) will actually be used or applied by the Army. The intent of the Program Comment is that the Army apply these guidelines consistently across installations where Capehart and Wherry units will be retained by the Army. If the Council believes that the Army is not using the guidelines as intended, the Council may withdraw the Program Comment in its entirety.

There (is no) proposal by the Army to commit to the preservation of Capehart Wherry properties. The Program Comment has been modified to allow for identification and preservation of properties of particular importance for continued use as military housing within the funding and mission constraints of the Army.

The Army should not be allowed to proceed under the program comments demolition prior to the completion of the mitigation actions. While the Army is allowed to proceed with action which affect Capehart and Wherry properties prior to completion of mitigation, the Program Comment prevents them from completing management action which may preclude the eventual successful completion of the steps outlined in the Program Comment.

Rather than leaving to chance the question of which of these properties may survive, if any, the Army should identify a limited selection of these resources in advance, based on criteria of significance, and should place an explicit priority on actually preserving them. The Program Comment has been modified to establish a process for the identification of Capehart and Wherry Era properties of particular importance and to allow the preservation of such properties for continued use as military housing within the funding and mission constraints of the Army.

The Army's proposal does not contemplate any distinction whatsoever in the treatment of properties that have special architectural or other significance. The revised and expanded context study will include identification of significant architects, builders/contractors/developers and subcontractors. Upon completion, the context study will be reviewed for Capehart and Wherry Era properties of particular importance. Properties identified in this review process may

have additional historical documentation completed for them, as needed, they will be taken into consideration in producing the video documentation and they will be considered for preservation through continued use as Army family housing.

III. Text of the Program Comment

The full text of the Program Comment is produced below:

Program Comment for Capehart and Wherry Era Army Family Housing and Associated Structures and Landscape Features (1949–1962)

I. Introduction

This Program Comment, adopted pursuant to 36 CFR 800.14(e), demonstrates Department of the Army (Army) compliance with its responsibilities under section 106 of the National Historic Preservation Act with regard to the following management actions for Capehart and Wherry Era Army family housing, associated structures and landscape features: maintenance and repair; rehabilitation; layaway and mothballing; renovation; demolition; demolition and replacement; and transfer, sale of lease out of Federal control.

Structures associated with this family housing include detached garages, carports and storage buildings, and the landscape features (including but not limited to the overall design and layout of the Capeharts and Wherry Era communities, including road patterns, plantings and landscaping, open spaces, playgrounds, parking areas, signage, site furnishings, views into and out of the community, lighting, sidewalks, setbacks and all other associated cultural landscape features). A small percentage of buildings and structures constructed during this period were not constructed with funds provided through the Capehart and Wherry funding programs, but are similar in all other respects, and are therefore included in this Program Comment.

II. Treatment of Capehart and Wherry Properties

a. Consideration of Eligibility

The Army conducted a historic context of its Capehart and Wherry properties in a report entitled *For Want of a Home: A Historic Context for Wherry and Capehart Military Family Housing*. On May 22, 2001, the Army sponsored a symposium on Capehart and Wherry Era housing management as it relates to historic preservation. The symposium was attended by preservation experts, including the National Trust for Historic Preservation

(Trust), the National Conference of State Historic Preservation Officers (NCSHPO), the Advisory Council on Historic Preservation (Council), and nationally recognized experts in the field of historic preservation from academia and industry. As recommended by the symposium participants, the treatment section, below, presents the programmatic approach for complying with section 106. The Army considers its inventory of Capehart and Wherry Era properties, including any associated structures and landscape features, to be eligible for the National Register of Historic Places for the purposes of section 106 compliance.

b. Treatment

The Army requested a Program Comment as an Army-wide section 106 compliance action related to management of Capehart and Wherry Era housing, associated structures and landscape features. This programmatic approach will facilitate management actions for maintenance and repair; rehabilitation; layaway and mothballing; renovation; demolition; demolition and replacement; and transfer, sale or lease of Capehart and Wherry Era housing, associated structures and landscape features out of Federal control. Such actions present a potential for adverse effects to these historic properties.

The following treatment is based on the measures proposed by the Army in their request for Program Comment, the comments received from the Council's "notice of intent to issue program comments" as published in the **Federal Register** (67 FR 12956; March 20, 2002) and follow up discussions between the Council, the Army, NCSHPO, and the Trust.

(1) *Context Study*: The Army will expand and revise the existing historic context, *For Want of a Home: A Historic Context for Wherry and Capehart Military Family Housing*. Consistent with issues identified during the symposium on Capehart and Wherry Era Housing held by the Army in May 2001, and subsequent public review, the Army will expand the historic context to address the following important issues:

(1) Explore changing Army family demographics following the end of the World War II and their impact on housing needs and responsive programs;

(ii) Focus on post-World War II suburbanization, housing trends and affordable housing programs in the civilian sector;

(iii) Identify those Capehart and Wherry properties that may be of particular importance due to their association with historically important builders, developers and architects;

(iv) Discuss associated structures, and landscape features, in addition to addressing the housing units; and

(v) Describe the inventory of Capehart and Wherry Era housing, providing information on the various types of buildings and architectural styles and the quantity of each.

(2) *Context Study Review*: The Army review the results of the expanded and revised context study and determine whether any of those properties identified under section II(b)(1)(iii) are of particular importance. The Army will notify the Council of the results of this review, and the Council will forward the results to the NCSHPO, and the Trust.

(3) *Design Guidelines*: The Army's scoping process identified landscape features as an important attribute of Capehart and Wherry Era land-use planning and development. Using information developed in the expanded and revised context study, the Army will develop *Capehart and Wherry Era Neighborhood Design Guidelines* that consider the importance of Capehart and Wherry Era family housing, associated structures and landscape features. The Army will:

(i) Provide the design guidelines to the Council for review;

(ii) Distribute the design guidelines to those facilities and installations that have been identified in the expanded and revised context study as having Capehart and Wherry Era properties; and

(iii) Consider the design guidelines in planning actions that affect the Army's Capehart and Wherry Era housing, associated structures and landscape features.

(4) *Properties of Particular Importance*: For Capehart and Wherry properties that have been determined to have particular importance under section II(b)(2), above, the Army will:

(i) Consider the need to conduct additional historical documentation for these properties;

(ii) Focus video documentation efforts on such properties; and

(iii) Within funding and mission constraints, consider the preservation of these properties through continued use as military housing.

(5) *Tax Credits*: The Army will advise developers involved in the Army's privatization initiatives that Capehart and Wherry Era properties may be eligible for historic preservation tax credits.

(6) *Video Documentation*: The Army will document and record Capehart and Wherry Era housing, associated structures and landscape features

through preparation of a video. The video will:

(i) Document and record representative structural types and landscape features at three installations, including appropriate examples of properties of particular importance;

(ii) Explain the relationship of this housing construction program to significant issues and topics researched for the expanded and revised context study;

(iii) Be distributed for educational purposes, and archived by the Army; and

(iv) Be provided, in digital format, to the Council, the Trust, and the NCSHPO.

(7) *Schedule for Completion:*

(i) Within 12 months from Council approval of the Program Comment, the Army shall complete:

(A) The expanded and revised context study for Capehart and Wherry Era housing as described in section II(b)(1), above;

(B) Review of the context study for properties of particular importance as described in II(b)(2), above; and

(c) The design guidelines as described in section II(b)(3), above; exclusive of section II(b)(3)(iii).

(ii) Within 24 months from Council approval of the Program Comment, the Army shall complete:

(A) Its consideration of properties of particular importance as described in section II(b)(4), above; and

(B) The video documentation of Capehart and Wherry Era housing as described in Section II(b)(6), above.

(8) *Availability:* Upon their completion, the Army will make final products available to installation commanders.

III. Applicability

This Program Comment does not apply to the following properties that are listed, or eligible for listing, on the National Register of Historic Places:

(a) Archeological sites;
(b) Properties of traditional religious and cultural significance to federally recognized Indian tribes or Native Hawaiian organizations; and/or

(c) Historic properties other than Army Capehart and Wherry Era housing, associated structures and landscape features.

IV. Effect of Program Comment

By the following this Program Comment, the Army meets its responsibilities for compliance under section 106 regarding management of its entire inventory of Capehart and Wherry Era housing (1949–1962), associated structures and landscape features.

Accordingly, installations are no longer required to follow the case-by-case section 106 review process for each individual management action affecting Capehart and Wherry Era housing, associated structures and landscape features.

The Army may carry out management actions prior to the completion of the treatment steps outlined above, so long as such management actions do not preclude the eventual successful completion of these steps.

This Program Comment will remain in effect until such time as the Department of the Army determines that such comments are no longer needed, and notifies the Council, in writing, or the Council withdraws the Program Comment in accordance with 36 CFR 800.14(e)(6). Following such withdrawal, the Army would be required to comply with the requirements of 36 CFR 800.3 through 800.7 for each individual management action.

The Council approved this Program Comment on May 31, 2002.

[Signed by Chairman John L. Nau, III on May 31, 2002]

Authority: 36 CFR 800.14(e).

Dated: June 4, 2002.

John M. Fowler,

Executive Director.

[FR Doc. 02–14389 Filed 6–6–02; 8:45 am]

BILLING CODE 4310–10–M

DEPARTMENT OF AGRICULTURE

Agricultural Research Service

Notice of Intent To Grant Exclusive License

AGENCY: Agricultural Research Service, USDA.

ACTION: Notice of intent.

SUMMARY: Notice is hereby given that the U.S. Department of Agriculture, Agricultural Research Service, intends to grant to Shrieve Chemical Co. of Woodlands, Texas, an exclusive license to U.S. Patent No. 5,676,994, “Non-Separable Starch-Oil Compositions,” issued on October 4, 1997 and to U.S. Patent No. 5,882,713, “Non-Separable Compositions of Starch and Water-Immiscible Organic Materials,” issued on March 16, 1999, for all uses in the field of oil drilling applications including, but not limited to, drilling muds and drilling lubricants.

U.S. Patent No. 5,676,994 is a continuation of U.S. Patent Application Serial No. 08/233,173, “Non-Separable Starch-Oil Compositions,” and U.S.

Patent No. 5,882,713 is a continuation-in-part of U.S. Patent Application Serial No. 08/233,173. Notice of Availability for U.S. Patent Application Serial No. 08/233,173 was published in the **Federal Register** on October 24, 1994.

DATES: Comments must be received within thirty (30) calendar days of the date of publication of this Notice in the **Federal Register**.

ADDRESSES: Send comments to: USDA, ARS, Office of Technology Transfer, 5601 Sunnyside Avenue, Rm. 4–1174, Beltsville, Maryland 20705–5131.

FOR FURTHER INFORMATION CONTACT: June Blalock of the Office of Technology Transfer at the Beltsville address given above; telephone: 301–504–5989.

SUPPLEMENTARY INFORMATION: The Federal Government’s patent rights in this invention are assigned to the United States of America, as represented by the Secretary of Agriculture. It is in the public interest to so license this invention as Shrieve Chemical Co. has submitted a complete and sufficient application for a license. The prospective exclusive license will be royalty-bearing and will comply with the terms and conditions of 35 U.S.C. 209 and 37 CFR 404.7. The prospective exclusive license may be granted unless, within thirty (30) days from the date of this published Notice, the Agricultural Research Service receives written evidence and argument which establishes that the grant of the license would not be consistent with the requirements of 35 U.S.C. 209 and 37 CFR 404.7.

Michael D. Ruff,

Assistant Administrator.

[FR Doc. 02–14288 Filed 6–6–02; 8:45 am]

BILLING CODE 3410–03–P

DEPARTMENT OF AGRICULTURE

Forest Service

Siskiyou County Resource Advisory Committee; Meeting

AGENCY: Forest Service, USDA.

ACTION: Notice of meeting

SUMMARY: The Siskiyou County Resource Advisory Committee (RAC) will meet on June 17, 2002, in Yreka, California. The purpose of the meeting is to discuss the following topics: Approval of Previous Meeting Minutes; Rating Criteria Review and Design; Timeline for RFPs from subgroup; Funding mechanisms status (report from Forest Service); Review successful and unsuccessful letters; 15% Merchantable



Preserving America's Heritage

PROGRAM COMMENT FOR COLD WAR ERA UNACCOMPANIED PERSONNEL HOUSING (1946 – 1974)

I. Introduction

This Program Comment provides DoD, and its Military Departments with an alternative way to comply with their responsibilities under Section 106 of the National Historic Preservation Act with regard to the effect of the following management actions on Cold War Era Unaccompanied Personnel Housing (UPH) that may be listed or eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

The term UPH means all buildings and structures, listed or eligible for listing on the National Register of Historic Places, that were designed and built as UPH in the years 1946-1974, regardless of use. This will be all such buildings and structures with the DoD Category Group (2 digit) Code of 72, Unaccompanied Personnel Housing, in the Military Service's Real Property Inventory currently or at the time of construction. Buildings in Category Group Code 72 include UPH and associated buildings and structures such as dining halls and laundry facilities constructed to support military housing needs. Table 1 (attached) provides all such buildings and structures, by Military Department, that are applicable to this program comment.

In order to take into account the effects on such UPH, DoD and its Military Departments will conduct documentation in accordance with The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. As each Military Department will be responsible for conducting its own mitigation actions, the following required documentation is structured by Military Department, followed by DoD-wide requirements.

II. Treatment of Properties

A. Army Mitigation

1. In 2003, the Army completed a study entitled Unaccompanied Personnel Housing (UPH) During the Cold War (1946-1989). This Historic Context study was undertaken to support the analysis of real property related to Army UPH, and to support the identification and evaluation of historic properties. In addition to providing historic information regarding the UPH program, the study also documents the property types defined in their historic context. In-depth archival research of primary and secondary sources was undertaken on the organizational history, doctrines, and policies that influenced the design and development of Army UPH during the Cold War era. Data were collected to identify significant events and policies that influenced site plans, building design, and spatial arrangement of Army UPH

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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facilities. Archival research was also directed to compile data on the evolution and modification of these property types over time. In addition, site visits to six Army installations containing UPH facilities were completed. The installations were examined to identify and document UPH-related property types based on extant real property in the Army inventory. These case studies included a summary installation history, interview data from the cultural resource management, a review of extant real property, and a detailed architectural analysis of the design, materials, construction and modification of over 700 examples of Army UPH. The resulting report provides a comprehensive and detailed record of Army UPH, including a collection of site plans, as-built building plans, and photographs (Chapter 4). Since these standard designs have already been well documented, no additional documentation of the Army's UPH is needed as part of the overall DoD mitigation. However, the Army should verify and document, as necessary, any building types and structures included on Table 1 that may not have been included in Unaccompanied Personnel Housing (UPH) During the Cold War (1946-1989).

2. The Army, in order to take into account effects on potentially historic UPH, will amend Unaccompanied Personnel Housing (UPH) During the Cold War (1946-1989) in order to make it available to a wider audience. Due to security concerns, the distribution of the context study is limited to US Government Agencies Only. The Army will remove the elements of the document that are security risks and then make the context available to DoD for consolidation with information gathered on Navy and Air Force UPH as required by Section II(D)(2), below..

B. Navy Mitigation

1. The Navy will produce a supplemental context study appendix that will be attached as an appendix to the Army's Unaccompanied Personnel Housing (UPH) During the Cold War (1946-1989). The final product will be a separately bound volume of additional information and photographs and tabular appendices that, when taken with the Army's and Air Force's context studies, provide a clear picture of the DoD's UPH. The context study appendix will:

explore the post-World War II changing demographics of Navy personnel and its impact on housing needs;

amend, as necessary, and adopt the Army's criteria for evaluating the historic significance of UPH;

consider the importance of major builders, developers and architects that may have been associated with design and construction of UPH; and

describe the inventory of UPH in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

2. The Navy shall document a representative sample of the basic types of UPH. The Navy will choose three geographically dispersed installations with the greatest number and variety of such resources. The Marine Corps will choose one such example. The sample chosen shall be the best representative examples of the range of UPH types constructed during the Cold War era. This documentation would include collecting existing plans and drawings, writing a historic description in narrative or outline format, and compiling historic photographs of the buildings (similar in scope to the Army's documentation).

C. Air Force Mitigation

1. The Air Force will produce a supplemental context study appendix that will be attached to the Army's Unaccompanied Personnel Housing (UPH) During the Cold War (1946-1989). The final product will be a

separately bound volume of additional information and photographs and tabular appendices that, when taken with the Army's and Navy's context studies, provide a clear picture of the Department of Defense's UPH. The context study appendix will:

explore the post-World War II changing demographics of Air Force personnel and its impact on housing needs;

amend, as necessary, and adopt the Army's criteria for evaluating the historic significance of UPH;

consider the importance of major builders, developers and architects that may have been associated with design and construction of UPH; and

describe the inventory of UPH in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

The Air Force shall include documentation of representative sampling of the basic types of UPH. The Air Force will choose three geographically dispersed installations with the greatest number and variety of such resources. The sample chosen shall be the best representative examples of the range of UPH types constructed during the Cold War era. This documentation would include collecting existing plans and drawings, writing a historic description in narrative or outline format, and compiling historic photographs of the buildings, and would be similar in scope to the Army's documentation.

D. DoD-Wide Mitigation

1. Additionally, DoD recently completed a draft context study entitled The Built Environment of Cold War Era Servicewomen through the Legacy Resource Management Program. This context study examines how the needs of women service members shaped construction plans and practices of several types of facilities, including UPH. The Legacy Program recently approved funds for the completion of this document. The legacy program will make the context study available to the Military Departments and the public to enhance the consideration and documentation of the UPH story.

2. DoD and its Military Departments will make copies of all documentation available electronically, to the extent possible under security concerns, and hard copies will be placed in a permanent repository, such as the Center for Military History. DoD will consolidate information from the Navy and Air Force documentation with the context provided by the Army, as required by Section II(A)(2) above, and make it available for public distribution.

3. As a result of on-going consultations with stakeholders, each Military Department will provide a list of its UPH properties covered by the Program Comment, by State, to stakeholders. Each Military Department will be responsible for determining how to convey its information.

4. All Military Departments will encourage adaptive reuse of UPH properties as well as the use of historic tax credits by private developers under lease arrangements. Military Departments will also incorporate adaptive reuse and preservation principles into master planning documents and activities.

These actions satisfy DoD's requirement to take into account the effects of the following management actions on DoD UPH that may be listed or eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, ceasing maintenance activities, new construction, demolition, deconstruction and salvage, remedial activities, and transfer, sale, lease, and closure.

III. Applicability

A. This Program Comment applies solely to Cold War Era DoD UPH as defined in Section I, above. The Program Comment does not apply to the following properties that are listed, or eligible for listing, on the National Register of Historic Places: (1) archeological properties, (2) properties of traditional religious and cultural significance to federally recognized Indian tribes or Native Hawaiian organizations, and/or (3) UPH in listed or eligible National Register of Historic Places districts where the UPH is a contributing element of the district and the proposed undertaking has the potential to adversely affect such historic district. This exclusion does not apply to historic districts that are made up solely of UPH properties. In those cases the Program Comment would be applicable to such districts.

Since the proposed mitigation for UPH documents site plans, building designs, and the spatial arrangement of UPH, along with the events and actions that lead to the development of UPH, the important aspects of UPH, whether single buildings or districts made up entirely of UPH, will be addressed regardless of the type of undertaking that may affect this particular property type.

B. An installation with an existing Section 106 agreement document in place that addresses UPH can choose to:

- (1) continue to follow the stipulations in the existing agreement document for the remaining period of the agreement; or
- (2) seek to amend the existing agreement document to incorporate, in whole or in part, the terms of this Program Comment; or
- (3) terminate the existing agreement document, and re-initiate consultation informed by this Program Comment if necessary.

C. All future Section 106 agreement documents developed by the Military Departments related to the undertakings and properties addressed in this Program Comment shall include appropriate provisions detailing whether and how the terms of this Program Comment apply to such undertakings.

IV. Completion Schedule

On or before 60 days following approval of the Program Comment, DoD, its Military Departments and ACHP will establish a schedule for completion of the treatments outlined above.

V. Effect of the Program Comment

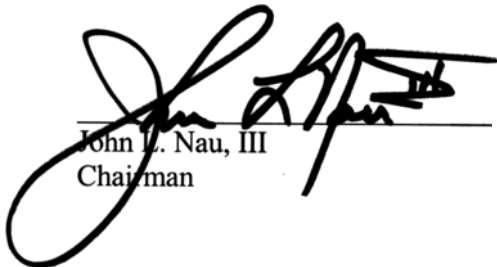
By following this Program Comment, DoD and its Military Departments meet their responsibilities for compliance under Section 106 regarding the effect of the following management actions on Cold War era DoD UPH that may be listed or eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, ceasing maintenance activities, new construction, demolition, deconstruction and salvage, remedial activities, and transfer, sale, lease, and closure. Accordingly, DoD installations are no longer required to follow the case-by-case Section 106 review process for such effects.

As each of the Military Departments is required under this Program Comment to document their own facilities, failure of any one Military Department to comply with the terms of the Program Comment will not adversely affect the other Departments' abilities to continue managing their properties under the Program Comment.

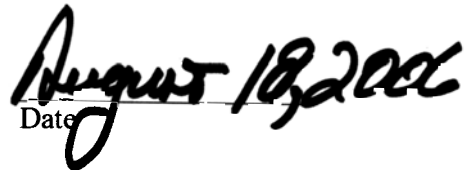
VI. Duration and Review of the Program Comment

This Program Comment will remain in effect until such time as DoD or its individual Military Departments determine that such comments are no longer needed and notifies ACHP in writing, or ACHP withdraws the comments in accordance with 36 CFR § 800.14(e)(6). Following such withdrawal, DoD or its individual Military Departments would be required to comply with the requirements of 36 CFR §§ 800.3 through 800.7 regarding the effects under this Program Comments' scope.

DoD, its Military Departments and ACHP will review the implementation of the Program Comment seven years after its issuance and determine whether to take action to terminate the Program Comment as detailed in the preceding paragraph.



John L. Nau, III
Chairman



Date

Attachment: Table 1

TABLE 1 - RPCS Heirarchy for Category Group 72

CG & Title	BC	BC Title	FAC	UM	FAC Title	MilDep	CAT CODE	UM AREA	UM OTH	UM ALT	CATCOD E LONG NAME
-72 - Unaccompanied Personnel Housing											
	721	Enlisted Unaccompanied Personnel Housing									
			7210	SF							
						Air Force	721312	SF	PN		DORMITORY AIRMAN PERMANENT PARTY/PCS-STUDENT
						Air Force	721313	SF	PN		TECHNICAL TRAINING STUDENT HOUSING
						Air Force	721314	SF	PN		DORMITORY, UNACCOMPANIED NCO
						Army	72111	SF	SP		ENLISTED UNACCOMPANIED PERSONNEL HOUSING
						Army	72170	SF	SP		UNACCOMPANIED PERSONNEL HOUSING, SENIOR NCO
						Navy	72111	SF	PN		BACHELOR ENLISTED QUARTERS E1/E4
						Navy	72112	SF	PN		BACHELOR ENLISTED QUARTERS E5/E6 (MARINE CORPS E-5 ONLY)
						Navy	72113	SF	PN		BACHELOR ENLISTED QUARTERS E7 THRU E9 (MARINE CORPS E6/E9)
						Navy	72124	SF	PN		BACHELOR ENL QTRS-MARINES E1/E4
						Navy	72125	SF	PN		BACHELOR ENL QTRS-MARINES E5
						Navy	72126	SF	PN		BACHELOR ENL QTRS-MARINES E6/E9
						Navy	72130	SF	PN		CIVILIAN BARRACKS -GS 01 THRU 06
						Navy	72131	SF	PN		CIVILIAN BARRACKS-BASE OPERATING SUPPORT CONTRACTOR
						Navy	72146	SF	PN		BERTHING--NAVAL HOME

7212 SF Enlisted Unaccompanied Personnel Housing, Transient

Air Force	721315	SF	PN	DORMITORY VISITING AIRMAN QUARTERS
Navy	72121	SF	PN	BACHELOR ENL QTRS-TRANSIENT E1/E4
Navy	72122	SF	PN	BACHELOR ENL QTRS-TRANSIENT E5/E6
Navy	72123	SF	PN	BACHELOR ENL QTRS-TRANSIENT E7/E9
Navy	72153	SF	PN	TRANSIENT PERSONNEL UNIT BARRACKS E7-E9
Army	72121	SF	SP	TRANSIENT UPH, ADVANCED INDIVIDUAL TRAINEES (AIT)
Army	72122	SF	SP	TRANSIENT UPH, ADVANCED SKILLS TRAINEES (AST)
Navy	72114	SF	PN	CLASS A STUDENT BARRACKS
Navy	72117	SF	PN	OFFICER CANDIDATE SCHOOL (OCS)
Navy	72118	SF	PN	NAVAL ACADEMY PREPARATORY SCHOOL (NAFS)
Navy	72119	SF	PN	BROADENED OPPORTUNITY FOR OFFICER SELECTION TRNG (BOOST)
Navy	72424	SF	PN	OFFICER INDOCTRINATION SCHOOL (OIS)

7213 SF Student Barracks

7214 SF Annual Training/Mobilization Barracks

Army	72114	SF	SP	ENLISTED BARRACKS, TRANSIENT TRAINING
Army	72115	SF	SP	ENLISTED BARRACKS, MOBILIZATION

7218 SF Recruit/Trainee Barracks

Air Force	721311	SF	PN	RECRUITS DORMITORY
Army	72181	SF	SP	TRAINEE BARRACKS
Navy	72115	SF	PN	RECRUIT-TYPE BARRACKS

722 Unaccompanied Personnel Housing Mess Facilities

7220 SF Dining Facility

Air Force	721215	SF	PN	DINING HALL IN AIRMAN DORMITORY
Air Force	722345	SF	PN	FAST FOOD SERVICE
Air Force	722351	SF	PN	AIRMAN DINING HALL - DETACHED
Air Force	722356	SF	PN	DINING HALL, OFFICER, DETACHED
Army	72210	SF	PN	DINING FACILITY
Army	72212	SF	PN	DINING FACILITY - TRANSIENT TRAINING
Navy	72145	SF	PN	DINING-FACILITY -BUILT-IN/ATTACHED
Navy	72210	SF	PN	ENLISTED DINING-FACILITY
Navy	72231	SF	PN	DINING-FACILITY -DETACHED-CIV PERS
Navy	72241	SF	PN	DINING-FACILITY -DETACHED-COM PERS
Navy	72430	SF	PN	COMMISSIONED-OFFICERS MESS -CLOSED(BLT-IN/ATCHD)

723 Detached Unaccompanied Personnel Housing Facility

7231 SF Miscellaneous UPH Support Building

Air Force	723155	SF	PN	DAYROOM LOUNGE
Army	72310	SF	PN	UPH LAUNDRY BUILDING, DETACHED
Army	72360	SF	PN	MISCELLANEOUS FACILITIES, DETACHED
Navy	72330	SF	PN	LAUNDRY DETACHED
Navy	72360	SF	PN	TROOP-HOUSING -OTHER DETACHED BUILDINGS
Navy	72377	SF	PN	TROOP HOUSING STORAGE (READY ISSUE/SHOP STORES/MISC.)

7232 SF Unaccompanied Personnel Housing Garage/Carport

Air Force	723241	SF	VE	GARAGE AUTOMOBILE
Army	72350	SF	VE	GARAGE, UPH, DETACHED
Army	72351	SF	VE	CARPORT, UPH

7233	SF	Dining Support Facility	Navy	72340	SF	VE	GARAGES DETACHED -BACHELOR HOUSING
7234	SF	Latrine/Shower Facility	Air Force	723385	SF	NS	KITCHEN, CENTRAL PREPARATION
			Air Force	723388	SF		FLIGHT KITCHEN
			Navy	72250	SF	SH	COLD-STORAGE -DETACHED-FROM-GALLEY
7235	EA	Miscellaneous UPH Support Facility	Air Force	714124	SF		ATTENDANTS SANITARY FACILITIES
			Air Force	723392	SF		SANITARY LATRINE
			Navy	72320	SF	PN	LATRINE DETACHED
7240	SF	Officer Unaccompanied Personnel Housing	Air Force	750663	EA	EA	PRIVATELY OWNED VEHICLE WASHRACK
			Navy	72350	EA	EA	WASH-RACK DETACHED
			Navy	72361	EA	EA	TROOP-HOUSING -OTHER DETACHED FACILITIES
7244	SF	Officer Unaccompanied Personnel Housing	Air Force	724415	SF	PN	OFFICER'S QUARTERS
			Air Force	724433	SF	PN	CADET QUARTERS
			Army	72410	SF	PN	UNACCOMPANIED OFFICERS QUARTERS, MILITARY
			Navy	72411	SF	PN	BACHELOR OFFICERS' QUARTERS PERMANENT PARTY W1/W2 & 01/02
			Navy	72412	SF	PN	BACHELOR OFFICERS QUARTERS PERMANENT PARTY W3-W5 & 03UP
			Navy	72422	SF	PN	CIVILIAN QUARTERS -GS 07 AND ABOVE
			Navy	72423	SF	PN	CIVILIAN QUARTERS-BASE OPERATING SUPPORT CONTRACTOR

7241 SF Officer UPH,
Transient

Air Force	724417	SF	PN	VISITING OFFICER'S QUARTERS
Army	72412	SF	PN	TRANSIENT TRAINING OFFICERS QUARTERS
Navy	72413	SF	PN	BACHELOR OFFICERS QUARTERS TRANSIENT W1/W2 AND 01/02
Navy	72414	SF	PN	BACHELOR OFFICERS QUARTERS TRANSIENT W3-W5 AND 03&UP

725 Emergency
Unaccompanied
Personnel
Housing
Facility

7250 SF Emergency
Unaccompanied
Personnel
Housing

Air Force	725513	SF	PN	CIVILIAN CAMP
Air Force	725517	SF	PN	CAMP TROOP
Army	72510	SF	PN	HUTMENT
Navy	72510	SF	PN	TROOP-HOUSING-EMERGENCY BUILDING

7251 SF EUPH Tent
Pad

Army				TENT PAD
Navy				TROOP-HOUSING -EMERGENCY FACILITY



Preserving America's Heritage

PROGRAM COMMENT FOR WORLD WAR II AND COLD WAR ERA (1939 – 1974) AMMUNITION STORAGE FACILITIES

I. Introduction

This Program Comment provides the Department of Defense (DoD) and its Military Departments with an alternative way to comply with their responsibilities under Section 106 of the National Historic Preservation Act with regard to the effect of the following management actions on World War II and Cold War Era ammunition storage facilities that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

The term Ammunition Storage Facilities means all buildings and structures, listed in or eligible for listing in the National Register of Historic Places, that were designed and built as ammunition storage facilities within the years 1939-1974, regardless of current use, and that are identified by a DoD Category Group (2 digit) code of 42, Ammunition Storage (category code 42XXXX), in the Military Service's Real Property Inventory currently or at the time of construction. Table 1 (attached) provides all such buildings and structures associated with ammunition storage, by Military Department, that are applicable to this program comment.

In order to take into account the effects on Ammunition Storage Facilities, DoD and its Military Departments will conduct documentation in accordance with The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. As each Military Department will be responsible for conducting its own mitigation actions, the following required documentation is structured by Military Department, followed by DoD-wide requirements.

II. Treatment of Properties

A. Army Mitigation

1. The Army shall expand and revise its existing context study, Army Ammunition and Explosives Storage in the United States, 1775-1945 to include the Cold War Era. This document provides background information and criteria for evaluating the historic significance of such buildings. The updated context study will:

identify the changes in ammunition storage during the Cold War;

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focus on the changes required for ammunition storage due to technological advancement in weaponry;

consider the importance of major builders, architects or engineers that may have been associated with design and construction of Ammunition Storage Facilities throughout the Army or at specific Army installations; and

describe the inventory of Ammunition Storage Facilities in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

2. The Army shall undertake in-depth documentation on Ammunition Storage Facilities at nine installations. The existing context study concluded that the Army possessed “only a few basic types and an abundance of examples” of Ammunition Storage Facilities, due to the standardization of ammunition storage facilities beginning in the 1920s. The context study suggests that six geographically dispersed installations contain an array of primary examples of both aboveground and underground magazines with a high degree of integrity:

Hawthorne Army Depot, Nevada – early igloos;

McAlester Army Ammunition Plant, Oklahoma – Corbetta Beehive;

Pine Bluff Arsenal, Arkansas – biological and chemical igloos;

Ravenna Army Ammunition Plant, Ohio – standard World War II and aboveground magazines;

Blue Grass Army Ammunition Plant, Kentucky – standard World War II igloos and aboveground magazines; and

Louisiana Army Ammunition Plant, Louisiana – Stradley special weapons.

The Army shall document these six as well as three additional installations that possess Cold War Era Ammunition Storage Facilities. Documentation at the three additional installations will be determined after completion of the expanded context study described in section II.A.1., above. This study will include a brief history of the installation and the surrounding community, if appropriate, and a detailed history of the storage facilities and documentation of the buildings. The documentation will primarily consist of historic photographs and existing plans. Documentation will be tailored to address the different natures of aboveground and underground storage.

B. Navy Mitigation

1. The Navy will develop a supplemental context study that will be attached as an appendix to the Army’s existing context study, Army Ammunition and Explosives Storage in the United States, 1775-1945. The final product will be a separately bound volume of additional information and photographs and tabular appendices that, when presented with the Army’s and Air Force’s context studies, provide a clear picture of the Department of Defense’s Ammunition Storage facilities. This context study appendix will:

cover both World War II and the Cold War Era, from 1939-1974;

explore the changes in ammunition storage resulting from World War II;

examine the changes required for ammunition storage due to technological advancement in weaponry during the Cold War;

consider the importance of major builders, architects or engineers that may have been associated with design and construction of Ammunition Storage Facilities; and

describe the inventory of Ammunition Storage Facilities in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

2. The Navy shall document a representative sample of the basic types of both aboveground and underground ammunition storage facilities. The Navy will choose three geographically dispersed installations with the greatest number and variety of such resources. The Marines will choose one such installation. The sample chosen shall be the best representative examples of the range of Ammunition Storage types constructed during World War II and the Cold War era. This documentation will include collecting existing plans and drawings, writing a historic description in narrative or outline format, and compiling existing historic photographs of the structures. Documentation will be tailored to address the different natures of aboveground and underground storage.

C. Air Force Mitigation

1. The Air Force will develop a supplemental context study that will be attached as an appendix to the Army's existing context study, Army Ammunition and Explosives Storage in the United States, 1775-1945. The final product will be a separately bound volume of additional information and photographs and tabular appendices that, when presented with the Army's and Navy's context studies, provide a clear picture of the Department of Defense's Ammunition Storage facilities. This context study appendix will:

cover the Cold War Era, from 1946-1974;

explore the changes in ammunition storage resulting from the Cold War;

examine the changes required for ammunition storage due to technological advancement in weaponry during the Cold War;

consider the importance of major builders, architects or engineers that may have been associated with design and construction of Ammunition Storage Facilities; and

describe the inventory of Ammunition Storage Facilities in detail, providing information on the various types of buildings and architectural styles and the quantity of each.

2. The Air Force shall document a representative sample of the basic types of both aboveground and underground ammunition storage facilities. The Air Force will choose three geographically dispersed installations with the greatest number and variety of such resources. The sample chosen shall be the best representative examples of the range of Ammunition Storage types constructed during the Cold War era. This documentation would include collecting existing plans and drawings, writing a historic description in narrative or outline format, and compiling existing historic photographs of the structures. Documentation will be tailored to address the different natures of aboveground and underground storage.

3. The Air Force will not be required to consider its World War II Era facilities in these mitigation actions. The Air Force was established in September 1947 and therefore was not associated with structures constructed during this era. Rather the Air Force has inherited its current inventory of 263 World War II Era Ammunition Storage facilities from former Army installations. Given the substantial

mitigation actions that will be undertaken by the Army to document its facilities, further documentation for the small number of similar facilities located at Air Force installations provides no additional historic value. While no documentation will be done on World War II facilities under the Air Force's control, all of the 263 facilities in its inventory are covered under this Program Comment.

D. DoD-Wide Mitigation

1. Copies of the documentation described above will be made available electronically, to the extent possible under security concerns, and hard copies will be placed in a permanent repository, such as the Center for Military History.
2. In addition, as a result of on-going consultations, each Military Department will provide a list of properties covered by the Program Comment, by State, to State Historic Preservation Officers, Tribal Historic Preservation Officers, and other interested parties, as appropriate. Each Military Department will be responsible for determining how to convey its information.
3. All Military Departments will encourage adaptive reuse of the properties as well as the use of historic tax credits by private developers under lease arrangements. Military Departments will also incorporate adaptive reuse and preservation principles into master planning documents and activities.

The above actions satisfy DoD's requirement to take into account the effects of the following management actions on World War II and Cold War Era ammunition storage facilities that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities.

III. Applicability

A. 1. This Program Comment applies solely to Ammunition Storage Facilities as defined in Section I, above. The Program Comment does not apply to the following properties that are listed, or eligible for listing, on the National Register of Historic Places: (1) archeological properties, (2) properties of traditional religious and cultural significance to federally recognized Indian tribes or Native Hawaiian organizations, and/or (3) ammunition storage facilities in listed or eligible National Register of Historic Places districts where the ammunition storage facility is a contributing element of the district and the proposed undertaking has the potential to adversely affect such historic district. This third exclusion does not apply to historic districts that are made up solely of ammunition storage facility properties. In those cases the Program Comment would be applicable to such districts.

Since the proposed mitigation for the Ammunition Storage facilities documents site plans, building designs, and the spatial arrangement of ammunition storage facilities, along with the events and actions that lead to the development of standardized ammunition storage facilities in DoD, the important aspects of ammunition storage, whether single buildings or districts made up entirely of ammunition storage, will be addressed regardless of the type of undertaking that may affect this particular property type. The one currently known ammunition storage district, at Hawthorne Army Ammunition Plant, has been identified for further study, as outlined in Section II(A)(2) above.

2. An installation with an existing Section 106 agreement document in place that addresses ammunition storage facilities can choose to:

(i) continue to follow the stipulations in the existing agreement document for the remaining period of the agreement; or

(ii) seek to amend the existing agreement document to incorporate, in whole or in part, the terms of this Program Comment; or

(iii) terminate the existing agreement document, and re-initiate consultation informed by this Program Comment if necessary.

3. All future Section 106 agreement documents developed by the Military Departments related to the undertakings and properties addressed in this Program Comment shall include appropriate provisions detailing whether and how the terms of this Program Comment apply to such undertakings.

IV. Completion Schedule

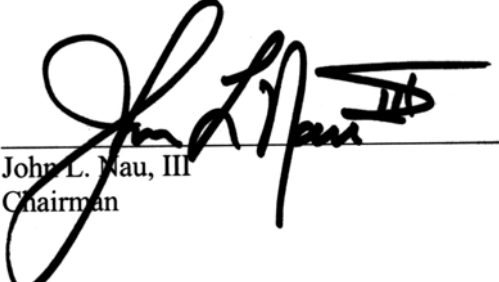
On or before 60 days following issuance of the Program Comment, DoD, its Military Department and ACHP will establish a schedule for completion of the treatments outlined above.

V. Effect of the Program Comment

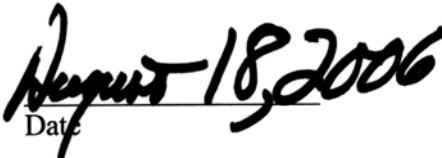
By following this Program Comment, DoD and its Military Departments meet their responsibilities for compliance under Section 106 regarding the effect of the following management actions on World War II and Cold War Era ammunition storage facilities that may be eligible for listing on the National Register of Historic Places: ongoing operations, maintenance and repair, rehabilitation, renovation, mothballing, cessation of maintenance, new construction, demolition, deconstruction and salvage, remediation activities, and transfer, sale, lease, and closure of such facilities. Accordingly, DoD installations are no longer required to follow the case-by-case Section 106 review process for such effects. As each of the Military Departments is required under this Program Comment to document their own facilities, failure of any one Military Department to comply with the terms of the Program Comment will not adversely affect the other Departments' abilities to continue managing their properties under the Program Comment.

This Program Comment will remain in effect until such time as the Office of the Secretary of Defense determines that such comments are no longer needed and notifies ACHP in writing, or ACHP withdraws the comments in accordance with 36 CFR § 800.14(e)(6). Following such withdrawal, DoD and its Military Departments would be required to comply with the requirements of 36 CFR §§ 800.3 through 800.7 regarding the effects under this Program Comments' scope.

DoD, its Military Departments and ACHP will review the implementation of the Program Comment seven years after its issuance and determine whether to take action to terminate the Program Comment as detailed in the preceding paragraph.



John L. Nau, III
Chairman



Date

Attachment: Table

TABLE 1 - RPCS Hierarchy for Category Group 42

CG & Title	BC	BC Title	FAC	UM	FAC Title	MilIDep	CAT CODE	UM AREA	UM OTH	UM ALT	CATCOD E LONG NAME
-42- Ammunition Storage	421	Depot and Arsenal Ammunition Storage	4211	SF	Ammunition Storage, Depot and Arsenal						
						Army	42104	SF			EXPLOSIVE TRANSFER BUILDING, DEPOT LEVEL
						Army	42107	SF			STRADLEY, NONATOMIC BLAST RESISTANT, DEPOT LEVEL
						Army	42110	SF			FUSE AND DETONATOR MAGAZINE, DEPOT LEVEL
						Army	42120	SF			HIGH EXPLOSIVE MAGAZINE, DEPOT LEVEL
						Army	42150	SF			SMOKELESS POWDER MAGAZINE, DEPOT LEVEL
						Army	42160	SF			SPECIAL WEAPONS MAGAZINE, DEPOT LEVEL
						Army	42170	SF			GUIDED MISSILE MAGAZINE, DEPOT LEVEL
						Army	42180	SF			IGLOO STORAGE, DEPOT LEVEL
						Army	42181	SF			AMMUNITION STOREHOUSE, DEPOT LEVEL
						Army	42182	SF			SMALL ARMS AMMUNITION MAGAZINE, DEPOT LEVEL
						Army	42183	SF			GENERAL PURPOSE MAGAZINE, DEPOT LEVEL
						Army	42184	SF			AMMUNITION HUT, DEPOT LEVEL
						Army	42186	SF			AMMUNITION STORAGE STRUCTURE, DEPOT LEVEL
						Army	42288	SF			AMMO STORAGE OTHER THAN DEPOT OR UNIT
						Navy	42112	SF		CF	FUSE&DETONATOR MAGAZINE
						Navy	42122	SF		CF	HIGH-EXPLOSIVE MAGAZINE
						Navy	42132	SF		CF	INERT STOREHOUSE
						Navy	42142	SF		CF	SMOKEDRUM STOREHOUSE
						Navy	42148	SF		CF	SMALL-ARMS PYROTECHNIC MAGAZINE
						Navy	42152	SF		CF	SMOKELESS-POWDER-PROJECTILE MAGAZINE
						Navy	42162	SF		CF	SPECIAL-WEAPONS MAGAZINE
						Navy	42172	SF		CF	MISSILE MAGAZINE

4212 SF Intercontinental Ballistic Missile Storage Facility

422 Installation and Ready Issue Ammunition Storage

4221 SF Ammunition Storage, Installation

SUBMARINE LAUNCHED BALLISTIC MISSILE STORAGE FACILITY

Navy 42182 SF

Air Force	422253	SF	STORAGE, MULTI-CUBICLE MAGAZINE
Air Force	422256	SF	STORAGE, ROCKET CHECKOUT AND ASSEMBLY
Air Force	422257	SF	STORAGE SEGREGATED MAGAZINE
Air Force	422258	SF	STORAGE MAGAZINE ABOVE GROUND TYPE A, B, & C
Air Force	422259	SF	MISSILE STORAGE FACILITY
Air Force	422264	SF	STORAGE IGLOO
Air Force	422271	SF	STORAGE, MODULE BARRICADED
Air Force	422273	SF	STORAGE IGLOO STEEL ARCH UNDERPASS
Army	42210	SF	FUSE AND DETONATOR MAGAZINE, INSTALLATION
Army	42215	SF	HIGH EXPLOSIVE MAGAZINE, INSTALLATION
Army	42225	SF	SMOKEDRUM STOREHOUSE, INSTALLATION
Army	42230	SF	SMALL ARMS AMMUNITION AND PYROTECHNICS MAGAZINE, INSTALLATION
Army	42231	SF	AMMUNITION STOREHOUSE, INSTALLATION
Army	42235	SF	READY MAGAZINE, INSTALLATION
Army	42240	SF	FIXED AMMUNITION MAGAZINE, INSTALLATION
Army	42250	SF	SPECIAL WEAPONS MAGAZINE, INSTALLATION
Army	42260	SF	GUIDED MISSILE MAGAZINE, INSTALLATION
Army	42280	SF	IGLOO STORAGE, INSTALLATION
Army	42281	SF	AMMUNITION HUT, INSTALLATION
Army	42283	SF	GENERAL PURPOSE MAGAZINE, INSTALLATION
Army	42285	SF	UNIT SMALL ARMS AMMUNITION STORAGE, INSTALLATION
Army	42286	SF	AMMUNITION STORAGE STRUCTURE, INSTALLATION

Navy 42135 SF CF READY MAGAZINE

423	Liquid Propellant Ammunition Storage	4231	GA	Liquid Propellant Storage, Ammunition Related				
					Air Force	42311	GA	LIQUID PROPELLANT AMMO STORAGE
					Army	42310	GA	LIQUID PROPELLANT STORAGE, AMMUNITION, BUILDING
					Army	42311	GA	LIQUID PROPELLANT STORAGE, AMMUNITION, FACILITY
					Army	42312	GA	LIQUID PROPELLANT STORAGE, AMMUNITION, STRUCTURE
					Navy	42310	GA	LIQUID-PROPELLANT STORAGE

424	Weapon-Related Battery Storage	4241	SF	Battery Storage, Weapon Related				
					Army	42410	SF	BATTERY COLD STORAGE BUILDING
					Navy	42410	SH	WEAPON-RELATED BATTERY STORAGE

425	Open Ammunition Storage	4251	SY	Open Ammunition Storage				
					Army	42510	SY	AMMUNITION STORAGE PAD
					Navy	42510	SY	OPEN-AMMUNITION-STORAGE PAD
					Navy	42520	SY	CONTAINER-HOLDING YARD -EMPTY
					Navy	42530	SY	BARRICADED MODULE (OPEN)

APPENDIX F: FORT GORDON PROGRAMMATIC AGREEMENT

AMENDMENT TO
PROGRAMMATIC AGREEMENT
AMONG
THE UNITED STATES ARMY
AND
THE GEORGIA STATE HISTORIC PRESERVATION OFFICER
REGARDING THE OPERATION, MAINTENANCE,
AND DEVELOPMENT OF THE FORT GORDON ARMY INSTALLATION
AT FORT GORDON, GEORGIA

WHEREAS, the Agreement was executed on June 2006;

WHEREAS, ongoing consultation between Fort Gordon and the Georgia Historic Preservation Officer and the Advisory Council on Historic Preservation will not be completed before the expiration date of the Programmatic Agreement on December 31, 2010;

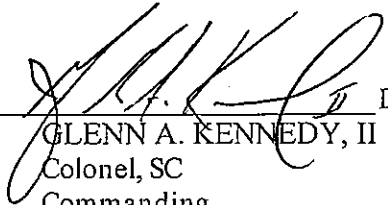
WHEREAS, Fort Gordon will send a copy of this executed amendment to the ACHP;

NOW THEREFORE, in accordance with Stipulation VIV (F) of the Agreement, Fort Gordon and the Georgia State Historic Preservation Officer agree to amend the Agreement as follows:


1. Amend Stipulation VIV (N) so it reads as follows:

1. This Programmatic Agreement shall take effect on the date it is signed by the last signatory and will remain in effect until June 30, 2011 unless terminated pursuant to Stipulation VIV(K). If not renewed or extended, this Programmatic Agreement will expire on June 30, 2011. No extension or modification will be effective unless all signatories have agreed in writing.

FORT GORDON, GEORGIA

By:  Date: 15 DEC 2010
GLENN A. KENNEDY, II
Colonel, SC
Commanding

GEORGIA STATE HISTORIC PRESERVATION OFFICER

By:  Date: 6 JAN '11
DR. DAVID CRASS
Deputy Georgia State Historic Preservation Officer

PROGRAMMATIC AGREEMENT
AMONG
THE UNITED STATES ARMY
AND
THE GEORGIA STATE HISTORIC PRESERVATION OFFICER
REGARDING THE OPERATION, MAINTENANCE,
AND DEVELOPMENT OF THE FORT GORDON ARMY INSTALLATION
AT FORT GORDON, GEORGIA

WHEREAS, the Army proposes to continue to coordinate and administer an ongoing program of operation, maintenance, training, testing, and development at Fort Gordon, Georgia; and,

WHEREAS, the Army has determined that the aforementioned program may have an effect on properties eligible for listing on the National Register of Historic Places (NHRP) and has consulted with the Georgia State Historic Preservation Officer (SHPO) pursuant to Section 800.14(b) of the regulations (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f); and,

WHEREAS, the US Army Garrison Fort Gordon encompasses approximately 55,600 acres of land including 437 acres of water in Richmond, Columbia, McDuffie and Jefferson Counties in Georgia; and,

WHEREAS, Fort Gordon is understood to be the property indicated on the map at Appendix A; and,

WHEREAS, this Programmatic Agreement (PA) applies to all undertakings within the boundaries of Fort Gordon that are under the direct jurisdiction of the Army including undertakings performed by Fort Gordon lessees, permittees and tenant units; and,

WHEREAS, Fort Gordon maintains a spatial database of cultural resources geographic and tabular data in a Geographic Information System (GIS) of all archaeologically surveyed areas, pre-historic and historic NRHP eligible, potentially-eligible and documented properties of undetermined eligibility, and utilizes this information for planning purposes for proposed and ongoing installation activities; and,

WHEREAS, pursuant to Army Regulation 200-4 (AR 200-4), the Army has designated the Garrison Commander (Commander) to serve as the agency official responsible for compliance with the requirements of Section 106 of the National Historic Preservation Act; and,

NOW, THEREFORE, the Army and the Georgia SHPO agree that Section 106 compliance at Fort Gordon shall be administered according to the following stipulations

to satisfy the Army's responsibilities for all individual undertakings associated with installation operation, maintenance, training, testing and development.

STIPULATIONS

The Commander, on behalf of the Army, shall ensure that the following measures are implemented:

I. Planning and Coordination of Installation Activities

A. Personnel

1. The Army shall employ, maintain a contract with, or, obtain through other means, qualified professionals that meet the *Secretary of the Interior's Professional Qualifications Standards* (36 CFR 61; 48 FR 44738-9), in disciplines appropriate to the installation's historic properties, to serve as technical support to the installation cultural resource management staff. The Commander shall ensure that the qualified professionals are in place available at the execution of this PA.
2. The Commander shall ensure that the Cultural Resources Manager (CRM) participates in installation-level planning for projects and activities that may affect historic properties. The Commander shall ensure that the CRM reviews all undertakings which are carried out in accordance with the terms of this PA.
3. The Commander shall ensure that all historic preservation work carried out pursuant to this PA is carried out by or under the supervision of or in coordination with the CRM, unless otherwise indicated in this PA. If an appropriate professional for certain specialized activities outside the normal day-to-day operations of the installation is not available, the Commander shall ensure that a qualified cultural resources professional will be obtained for these activities.

B. Planning

1. The Commander shall ensure that installation documents are analyzed by the CRM to identify specific undertakings that may be subject to review pursuant to Section 106 and the terms of this PA over a 5-year planning cycle. The documents to be analyzed shall include but are not limited to the Master Plan, military construction plans, troop training and range operation plans, Integrated Natural Resource Management Plans, Integrated Cultural Resource Management Plans, tenant activities, and historic property renovation and demolition plans that are scheduled for implementation within 5 years of the execution date of this PA.

2. The Commander shall ensure that schedules and priorities are established and documented for identification, evaluation, and treatment of historic properties that might be affected by the undertakings identified pursuant to Stipulation I(B)(1). The Commander shall ensure that all relevant offices at Fort Gordon are informed of the schedules and priorities, the potential of these undertakings to affect historic properties, the requirement to ensure that an analysis of alternatives is fully considered as early as possible in project planning, and of the requirement for review of the undertaking pursuant to this PA.

3. The Commander shall ensure that the undertakings and all related activities identified pursuant to Stipulation I(B)(1) are planned, reviewed, and carried out in accordance with the terms of this PA. The Commander shall include a list of undertakings in the annual report required pursuant to Stipulation VIV(C).

4. The Commander will ensure that in its planning efforts, the Army will make reasonable and good faith efforts to avoid adversely affecting archaeological sites and other historic properties eligible for the National Register. Where prudent and feasible, significant archaeological properties shall be preserved in place. Where prudent and feasible, historic structures eligible for listing on the National Register that may be identified on the installation shall also be preserved in place and will be treated in accordance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. If it is determined that an undertaking may adversely affect historic properties, the Commander will comply with Stipulation V(A).

II. Exempt Activities

A. Projects Exempt from Review

1. The following activities are considered to have no effect on historic properties and shall be exempt from further consideration under the terms of this agreement provided that the project is limited to activities herein:

a) Roadway, parking lot, and firebreak repair, resurfacing, or reconstruction that takes place within the previously maintained roadway or parking lot or firebreak surfaces;

b) Maintenance, repair, or replacement in-kind of existing sidewalks and curbs, not including historic pavements such as bricks or cobblestones;

c) Routine foot trail maintenance that does not involve new ground disturbance;

d) Routine maintenance of installation cemeteries including mowing, clearing, reseeding, fencing, and straightening of headstones;

- e) Repair, maintenance, or installation of utility poles, pedestals, and lines (including underground installations) that takes place within the existing disturbed utility right-of-way or trench;
- f) Approved active landfill operations, not including expansion into undisturbed areas, and formerly active landfills that are now closed;
- g) Approved active borrow pits, not including expansion into undisturbed areas, and formerly active borrow pits that are now closed;
- h) Removal, repair or replacement within existing locations of underground fuel and storage tanks;
- i) The repair or installation with in-kind material of the same size, texture and color of railroad warning devices, signs, lighting, guide rail, fencing, and traffic signals, provided that activities occur within the existing right-of-way or area of disturbance.
- j) Routine installation maintenance including grass cutting and tree trimming throughout the post;
- k) Routine cross-country passage of military field vehicles, including tracked vehicles; not including specifically protected areas such as cemeteries or NRHP listed, eligible, or potentially eligible historic properties as may be established in consultation between the Army, CRM staff and the SHPO;
- l) Routine firing of ordnance during the course of Army training and maneuvers;
- m) Training activities that do not involve mechanically-assisted excavation or excavation in unsurveyed areas.
- n) Projects at properties considered eligible for the National Register of Historic Places may proceed with certification by the CRM that the planned work stays entirely within the following limitations:
 - i) Replacement in-kind, matching the configuration, material, size, detail, and color of the historic fabric or landscaping;
 - ii) Refinishing in-kind, such as painting or covering surfaces with the same materials and in the same color;
 - iii) Alterations, modifications, repair, mothballing, or demolition of Capehart-Wherry era housing units, as the potential effects to these properties have already been appropriately considered though a

Nationwide Program Comment issued by the Advisory Council on Historic Preservation.

iv) Energy conservation measures that are not visible or do not alter or detract from the qualities that make a resource eligible for the National Register, that include but are not limited to the following:

- (1) Modifications to HVAC control systems, or conversions to alternative fuels;
- (2) Insulation in roofs, crawl spaces, ceilings, attics, walls, floors, and around pipes and ducts;
- (3) The installation of storm doors or windows, or insulated double or triple glazing, which match the size, color, profile and other distinguishing characteristics of the historic door or window;
- (4) Interior modifications when the significance of the building does not include the interior space;
- (5) Caulking and weather-stripping, provided the color of the caulking is consistent with the appearance of the building;
- (6) Replacement or modification of lighting systems when the modifications do not alter or detract from the significance of the property;
- (7) Removal of asbestos-containing materials, provided that the removal does not alter or detract from the qualities that make the resource eligible to the National Register, or provided that replacement is made in-kind both in color and appearance of non-asbestos containing materials;

III. Identification and Evaluation

A. Historic Context and Database

1. The Commander will ensure that the Army, in consultation with the Georgia SHPO, develops appropriate historic contexts to evaluate archaeological sites eligibility for inclusion on the National Register and provide for the timely application of these criteria to sites in the Fort Gordon inventory. Determinations of eligibility based on these criteria will be sent to the Georgia SHPO for concurrence.

2. The installation shall update or develop, as appropriate, a database, of available historic, prehistoric, ethnohistoric, landscape, and environmental data to provide a context within which to evaluate historic properties and to develop projections about the distribution and nature of historic properties that may exist on the installation.

3. The installation shall update or develop, as appropriate, a spatial database indicating the location of all historic properties that are listed in or determined eligible for listing in the NRHP.

B. Identification and Evaluation of Archeological Properties

1. As funds are available, the Commander will ensure that the Army continues to conduct archaeological inventories of the unsurveyed and undisturbed areas of the installation. Inventory methodology and reporting will meet the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* and recommended / relevant guidelines established by the Georgia State Historic Preservation Office. Priorities for archaeological surveys will be based upon the likelihood and intensity of impacts to historic properties by routine military training activities based on prior patterns of use as well as routine installation natural resource management activities. Areas previously disturbed by construction or troop activities such as the Cantonment Area and areas where survey is unsafe due to the presence of unexploded or dud ordnance (as shown on the map in Appendix B) shall be exempted from further survey and inventory for archaeological sites. Reports generated from these surveys will be sent to the Georgia SHPO for comment and review. Material collections and associated records will be managed IAW the Fort Gordon ICRMP.

C. Identification and Evaluation of Historic Districts, Buildings, Structures, Landscapes, and Objects (above-ground properties)

1. The Commander shall, to the extent that funds are available, initiate an installation-wide historic properties inventory to identify potentially eligible historic buildings, structures, objects, sites, and districts IAW the Fort Gordon ICRMP. This will include application of the criteria for the evaluation of the properties' eligibility for inclusion on the National Register. Determinations of eligibility will be made by the Army and forwarded to the Georgia SHPO for concurrence. Disputes regarding eligibility between the Army and the SHPO will be referred to the Keeper of the National Register for determination.

IV. Internal Review Process

A. Internally-Reviewed Undertakings

1. So long as the Army continues to maintain an adequate and qualified cultural resources management staff as described in Stipulation I(A)(1), projects described in this stipulation will be reviewed internally by Fort Gordon cultural resources management staff as discussed in Stipulation IV(B), and will not be sent to the SHPO unless there are unresolved issues of eligibility, effect or appropriate mitigation as discussed in Stipulation IV(B). However, these reviews will be documented in an annual written report to the SHPO required pursuant to Stipulation VIV(C). This stipulation applies to:

- a) Mechanically-assisted excavations conducted for training and other purposes by military units in areas of prior ground disturbance and/or completed archaeological surveys;
- b) The routine relocation of construction to avoid adverse impacts to historic properties eligible for inclusion on the National Register;
- c) The approval of tracts for natural resources and/or forest management activities in areas of prior ground disturbance and/or completed archaeological surveys;
- d) The demolition of World War II temporary buildings that have been documented as part of the Programmatic Agreement among the Department of Defense (DoD), the Advisory Council on Historic Preservation (ACHP), and the National Council of State Historic Preservation Officers (NCSHPO) (Appendix C);
- e) The alteration, maintenance, repair or demolition of buildings less than fifty (50) years of age, unless it has been determined by CRM staff, in consultation with the Georgia SHPO, that such buildings possess characteristics of exceptional significance or significance associated with the Cold War era; and
- f) Agricultural activities restricted in tillage depth to a level no deeper than previously practiced on a particular tract.

B. Internal Review Process

1. The activities in Stipulation IV(A)(1) will be reviewed as discussed below:

- a) The proponent of the activity, in consultation with the CRM, will determine if prior identification surveys for historic properties have been conducted in the project area (i.e., the area of potential effect (APE) as defined in 36 CFR Section 800.16(d)). If the project area has been surveyed for historic properties, and no such properties have been identified, the project can proceed as planned.

b) If the project area has been surveyed for the presence of historic properties, and potentially eligible or unevaluated properties have been identified, the Army shall evaluate the property for NR eligibility pursuant to 36 CFR Section 800.4(c) and forward documentation supporting this evaluation to the Georgia SHPO. If the Army and the SHPO agree that no properties in the project area are eligible for inclusion on the National Register of Historic Places, the project can proceed as planned. If the Army and the SHPO agree that any property in the project area is eligible for the NRHP, the Army and the SHPO will enter into consultation to evaluate the effect of the project on the historic property and to develop an appropriate avoidance, minimization, or mitigation strategy. If the Army and the SHPO do not agree on eligibility, the Army will consult the Keeper of the National Register pursuant to 36 CFR Section 800.4(c)(2).

c) If the project area has not been surveyed for the presence of historic structures, Cultural Resource Management staff will determine whether potentially eligible structures are present in the project area pursuant to 36 CFR 800.4(a) and (b). If no such structures are present, no further action regarding historic structures is necessary. If potentially eligible structures are present, the Army will prepare determinations of eligibility and forward supporting documentation to the Georgia SHPO for concurrence. If the Army and the SHPO agree that the structure is not eligible for inclusion on the National Register of Historic Places, the project can proceed as planned. If the Army and the SHPO agree that the structure is eligible for the NRHP, the Army and the SHPO will enter into consultation to evaluate the effect of the project on the structure and to develop an appropriate avoidance, minimization, or mitigation strategy. If the Army and the SHPO do not agree on eligibility, the Army will consult the Keeper of the National Register pursuant to 36 CFR Section 800.4(c)(2) as in Stipulation IV(B)(1)(b).

d) If the project area has not been surveyed for the presence of archaeological sites, Cultural Resources Management staff will conduct a field check of the property. One of two actions will result from this field check:

i) Activities taking place in areas previously disturbed by ground-disturbing activities or in areas where there is a low probability of archaeological sites due to environmental conditions such as slope or permanent standing water will not be subject to further investigation.

ii) Activities scheduled for areas that appear to be undisturbed shall be surveyed by Fort Gordon Cultural Resource Management staff or other qualified personnel as described in Stipulation I(A). Survey will be conducted in a manner consistent with the *Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation* and with guidance provided by the Georgia State Historic Preservation Office.

Reports from such surveys will be forwarded to the Georgia SHPO with the annual report.

iii) If no archaeological sites are found during survey pursuant to Stipulation IV(B)(1)(d)(ii), the GIS will be updated to reflect same, and the project can proceed as planned.

iv) If archaeological sites are found during survey pursuant to Stipulation IV(B)(1)(d)(ii), they will be recorded and added to the Fort Gordon GIS archaeological site inventory. The project shall be postponed or relocated to avoid the site until its eligibility to the NRHP can be evaluated. The Army will evaluate whether or not the site is eligible for inclusion on the NRHP and will forward documentation supporting this determination to the Georgia SHPO. If the Army and the SHPO agree that the site is not eligible for inclusion on the NRHP, no further avoidance or work will be necessary at the site. If the Army and the SHPO do not agree on eligibility, the Army will consult the Keeper of the National Register pursuant to 36 CFR Section 800.4(c) as in Stipulation IV(B)(1)(b). If the Army and the SHPO agree that the site is eligible for the NRHP, the Army will evaluate the effect of the project on the site, provide documentation regarding its determination of effect and, if the effect is adverse, provide documentation regarding proposed avoidance, minimization or mitigation measures to the SHPO and afford the SHPO 30 days after receipt of this documentation to comment on the proposed treatment. If the SHPO disagrees with the Army's determinations or suggested measures, the Army will forward all relevant documentation to the Council and request Council comment pursuant to 36 CFR Section 800.6(b)(1). Within 30 days after receipt of all pertinent information, the Council will respond to the Army's request. The Army will take Council comment into account in accordance with 306 CFR Section 800.6(c) with reference to the subject of the dispute.

V. Activities Subject to Review

A. Activities Requiring SHPO Review

1. The following activities shall be individually coordinated with the Georgia SHPO, and as necessary, the Council as described in Stipulation V(B). These activities include:

- a) Plans for construction in any area of the installation that the Commander believes will potentially have an adverse effect on historic properties;
- b) Proposed construction activities (not including those activities discussed in Stipulation IV(B)(1) above) outside of the cantonment area; and

- c) Projects with significant cause for public objection or controversy.

B. Coordination Process

1. The projects in Stipulation V(A) will be coordinated with the Georgia SHPO as follows:

- a) The Army will review existing information on historic properties in the project area, gather information on the likelihood that unidentified historic properties exist in the project area, and undertake any additional actions necessary to identify historic properties in the area of potential effect. In consultation with the Georgia SHPO, the Army will make a reasonable and good faith effort to identify historic properties within the project area, provide a description of historic properties identified in the project area, and gather sufficient information to evaluate the eligibility.

- b) If potentially eligible or unevaluated properties are present in the project area, the Army will evaluate the property for NR eligibility pursuant to 36 CFR Section 800.4(c) and will forward documentation supporting this evaluation to the Georgia SHPO via certified mail for review and concurrence. The SHPO shall be afforded 30 calendar days to respond to the Army's recommendations. If the documentation has been received by the SHPO, and after 30 calendar days neither comment nor a concurrence has been received by the Army, SHPO concurrence with the proposed action may be assumed and the project may be implemented. If the Army and the SHPO agree that the site is not eligible for inclusion on the NRHP, no further avoidance or work will be necessary at the site. If the Army and the SHPO do not agree on eligibility, the Army will consult the Keeper of the National Register pursuant to 36 CFR Section 800.4(c)(2) as in Stipulation IV(B)(1)(b).

- c) If the Army and the SHPO agree that the property is eligible for the NRHP, the Army will evaluate the effect of the project on the historic property and forward documentation regarding its decision to the SHPO. The SHPO will be afforded 30 calendar days to respond. If the Army and the SHPO concur after consultation that the project will have no adverse impact on historic properties, the project can proceed as planned. If the Army determines that the effect is adverse, the Army will provide documentation to the SHPO specifying its efforts to avoid or minimize adverse effects or specifying the Army's proposed mitigation measures. The SHPO will be afforded 30 calendar days to respond. If the SHPO disagrees with the Army's determination of effect or suggested mitigation measures and the disagreement cannot be resolved with further consultation, the Army will forward all relevant documentation to the Council and request Council comment pursuant to 36 CFR Section 800.7(a)(1) and allow the Council 45 days to respond. Any Council comment provided in response to such a request shall be taken into account by the Army in accordance with 36 CFR Section 800.7(c) with reference to the subject of the dispute.

VI. Native American Consultation

A. Consultation Procedures

1. The Commander shall consult with Tribal Historic Preservation Officers and/or other designated representatives of federally-recognized Native American tribes (listed in Appendix D) that may have an affiliation with or interest in cultural items found at Fort Gordon to determine whether and which historic properties at Fort Gordon have religious and/or cultural significance to each tribe.
2. When survey in previously unsurveyed areas results in the discovery of pre-historic resources, Fort Gordon will consult with the tribes (listed in Appendix D) to determine whether the discovered resource(s) is of religious or cultural significance.
3. When any of the undertakings described in Stipulations IV(A)(1), or V(A) may affect a known historic property with religious or cultural significance to a Native American tribe, the Commander will ensure that information regarding the proposed undertaking and the possible effects to the known property are provided to the tribe or tribes and that the comments received from the tribe(s) are considered in determinations of effect.
4. When a proposed undertaking will have an adverse effect on a historic property of religious or cultural significance, the tribe or tribes for which the historic property has such significance will be consulted according to the same procedures as afforded the SHPO in stipulation V(B).
5. The Commander shall withhold information about the location or character of a historic property of traditional religious and cultural importance if disclosure may cause a significant invasion of privacy or impede the use of a traditional religious site by practitioners.

VII. Emergency Discovery

Activity that disturbs the ground has the potential to discover buried and previously unknown archaeological deposits. While Fort Gordon makes every effort to minimize potential effects to historic properties during the planning process, the potential for inadvertent discovery must be considered.

A. Notification of installation discovery procedures

1. The Commander shall ensure that written instructions are provided to individuals and groups conducting ground-disturbing construction activities on the installation that specify procedures to be followed if archaeological materials or human remains are found during any phase of construction. If archaeological material, including human remains and cultural items as defined by NAGPRA (43 CFR 10) are found, the CRM must be notified immediately.

B. Procedures to be followed upon discovery of archaeological material, human remains or cultural items

1. All construction activities will immediately cease and will remain so until the Commander determines that activities can resume consistent with reasonable efforts to avoid, minimize or mitigate adverse effects pursuant to 36 CFR 800.13(b), and in the case of Native American human remains and/or cultural objects, in accordance with 43 CFR 10.4(d)(2).

The Fort Gordon CRM will arrange for the protection of the find until identification and follow-up steps are completed, as appropriate.

2. The CRM shall make efforts to visit the site within twenty-four (24) hours of notification of human remains or cultural objects, but this site visit will take place no later than three (3) working days after receipt of written notification IAW 43 CFR 104(d)(iii).

3. If, upon examination, the materials are determined to be non-human, the Commander, in consultation with the CRM, shall determine if archaeological contexts are present that require evaluation pursuant to Section 106 (36 CFR 800) of the NHPA (16 USC 470-470w).

4. If, upon examination, the materials are determined to be human remains associated with a crime scene of 50 years old or less, the Cultural Resources Manager will notify the Provost Marshal's Office (PMO) and the Criminal Investigation Division (CID) on post and the county Sheriff's Department. The site will be secured and declared off-limits to all personnel except those authorized during the investigation (no less than 50-meter radius around the site). The CID will assume custody of the remains and notify the proper authorities.

5. If, upon examination, the remains appear to be human, but are not associated with a crime scene, or if all law enforcement officials contacted have determined that the remains will not be involved in a legal investigation, the SHPO will be contacted and the site will be entered into the Fort Gordon cultural resources GIS database and Integrated Cultural Resources Management Plan (ICRMP).

6. If after consultation with the SHPO, the remains are determined to be Native American and are not associated with a crime, the Fort Gordon Cultural Resources Manager shall make a written field evaluation of the circumstances of

the discovery, the condition and contents of the burial, including any artifacts, the primary context of the remains and any artifacts, and their antiquity and significance. The human remains and cultural objects will be evaluated in situ. Destructive analysis is prohibited. If an in situ identification of the remains cannot be made, the potential culturally-affiliated tribes will be consulted pursuant to 43 CFR 10.3(b) and further identification procedures will be discussed. In all cases Native American remains and/or other cultural items being present, full NAGPRA compliance measures will be initiated.

The Fort Gordon CRM may consult with the CID or a qualified physical or forensic anthropologist if necessary. The site will be protected including stabilization or covering if necessary.

7. The Commander will be notified in writing of the discovery. Fort Gordon CRM will also notify Installation Military Police (MPs) and CID offices that compliance procedures are in effect.

No later than seventy two (72) hours after receipt of discovery, the Installation Commander or his/her official designee shall certify notification has been received and will forward this certification to higher headquarters.

8. Neither Fort Gordon, nor the Native American tribe(s) involved in consultations, shall disclose information concerning the nature and location of the site outside their respective governmental authorities. However, federally recognized tribes other than the consulting tribe, which may have a claim of custody to these human remains and/or other cultural items, may be sent documentation under similar comprehensive agreements or upon written request to the Fort Gordon CRM.

9. The Fort Gordon CRM shall ensure that final disposition of Native American remains and/or other cultural items recovered under this part is carried out in accordance with the provisions in 43 CFR 10.6.

VIII. Involvement of Interested Parties

A. Identification

1. The installation, in consultation with the SHPO, shall identify parties that may be interested in the effects of Army undertakings on historic properties and develop a plan for involving such parties, as appropriate, in consultations to resolve adverse effects.

B. Native American Participation

1. When an undertaking may affect historic properties of traditional cultural and religious importance to a federally-recognized Native American tribe on non-tribal lands, the installation shall afford the tribe the opportunity to participate as interested persons.

VIV. Administrative Stipulations

A. Alterations to Project Documentation

1. The installation shall not alter any plan, project specifications, or other document that has been reviewed and commented on pursuant to this PA, except to finalize documents commented on in draft, without first affording the appropriate party the opportunity to review the proposed change and determine whether it is consistent with the original document or requires further consultation. If one or more of the parties determines that further consultation is required, the Army shall consult according to the appropriate stipulations of this PA and applicable law.

B. Anti-Deficiency Act Compliance

1. The stipulations of this PA are subject to the provisions of the Anti-Deficiency Act. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the stipulations of this PA, the Army will consult in accordance with the amendment and termination procedures found at Stipulation I of this PA.

C. Reporting and Annual Review

1. The Commander shall provide the SHPO, the Council, and SERO, with an annual report on or before January 30 of each year summarizing activities carried out under the terms of this PA.

a) Annual reports shall include a list of projects and program activities that affected historic properties, a summary of treatment or mitigation measures implemented to address the effects of undertakings, and a summary of consultation activities and the views of the SHPO and interested parties where appropriate.

b) The signatories to this PA shall review this information to determine what, if any, revisions or amendments are necessary.

2. The Commander shall ensure that the annual report is available for public inspection that interested members of the public are made aware of its availability, and that interested members of the public are invited to provide comments to the Army, SHPO, and the Council.

D. Dispute Resolution

1. Should any signatory to this PA object to any action carried out or proposed by the Army with respect to the implementation of this PA, the Commander shall consult with the objecting party to resolve the objection. If after initiating consultation, the Commander determines that the objection cannot be resolved through consultation, the Commander shall forward all documentation relevant to the dispute to the Council. Within 30 calendar days after receipt of all pertinent documentation, the Council shall exercise one of the following options:

a) Advise the Army that the Council concurs in the Army's proposed final decision, whereupon the Army will respond to the objection accordingly;

b) Provide the Army with recommendations, which the Army shall take into account in reaching a final decision regarding its response to the objection;

c) Notify the Army that the Council will comment pursuant to 36 CFR Section 800.7(c), and proceed to comment. The resulting comment will be taken into account by the Army in accordance with 36 CFR Section 800.7(c)(4) and Section 110(l) of NHPA.

2. Should the Council not exercise one of the above options within 30 days after receipt of all pertinent documentation, the Army may assume the Council's concurrence in its proposed response to the objection.

3. The Army shall take into account any Council recommendation or comment provided in accordance with this stipulation with reference only to the subject of the objection; the Army responsibility to carry out all actions under this PA that are not the subject of the objection shall remain unchanged.

4. At any time during implementation of the measures stipulated in this PA, should an objection pertaining to this PA be raised by a member of the public, the Army shall notify the parties to this PA and take the objection into account, consulting with the objector and, should the objector so request, with any of the parties to this PA to resolve the objection.

E. Monitoring

1. The SHPO and the Council may monitor any activities carried out pursuant to this Agreement, and the Council will review any activities if so requested. The Commander will cooperate with the SHPO and the Council should they request to monitor or to review project files for activities carried out pursuant to this Agreement.

F. Amendment of the Programmatic Agreement

1. Any party to this PA may propose to the Army that the PA be amended, whereupon the Army shall consult with the other parties to this PA to consider such amendment. 36 CFR Section 800.14 shall govern the execution of any amendment.

K. Termination of the Programmatic Agreement

1. If the Commander determines that the Army cannot implement the terms of this PA, or if the SHPO or Council determines that the PA is not being properly implemented, the Army, the SHPO, or Council may propose to the other parties to this PA that it be terminated.

2. The party proposing to terminate this PA shall so notify all parties to this PA, explaining the reasons for termination and affording them at least thirty (30) days to consult and seek alternatives to termination.

3. Should such consultation fail and the PA be terminated, the Army shall:

- a) Consult in accordance with 36 CFR Section 800.14(b) to develop a new PA; or,
- b) Comply with 36 CFR Part 800 Subpart B with regard to each undertaking.

M. Compliance with the Programmatic Agreement

1. In the event that the Army cannot carry out the terms of this Programmatic Agreement, the Army shall comply with 36 CFR Part 800 with regard to each undertaking at Fort Gordon.

N. Expiration and Renewal of the Programmatic Agreement

1. This Programmatic Agreement shall take effect on the date it is signed by the last signatory and will remain in effect until December 31, 2010 unless terminated pursuant to Stipulation VIV(K). If not renewed or extended, this Programmatic Agreement will expire on December 31, 2010. No extension or modification will be effective unless all signatories have agreed in writing.

Execution and implementation of this Programmatic Agreement evidences that the Army has afforded the Georgia State Historic Preservation Officer a reasonable opportunity to comment on the program at Fort Gordon, and that the Army has taken into account the effects of the program on historic properties at Fort Gordon.

FORT GORDON, GEORGIA

By: *Karen S. Adams, Deputy* Date: *13 June 2006*
KAREN. S. ADAMS
for Colonel, SC
Commanding

GEORGIA STATE HISTORIC PRESERVATION OFFICER

By: *W. Ray Luce* Date: *6/23/06*
RAY LUCE
Georgia State Historic Preservation Officer

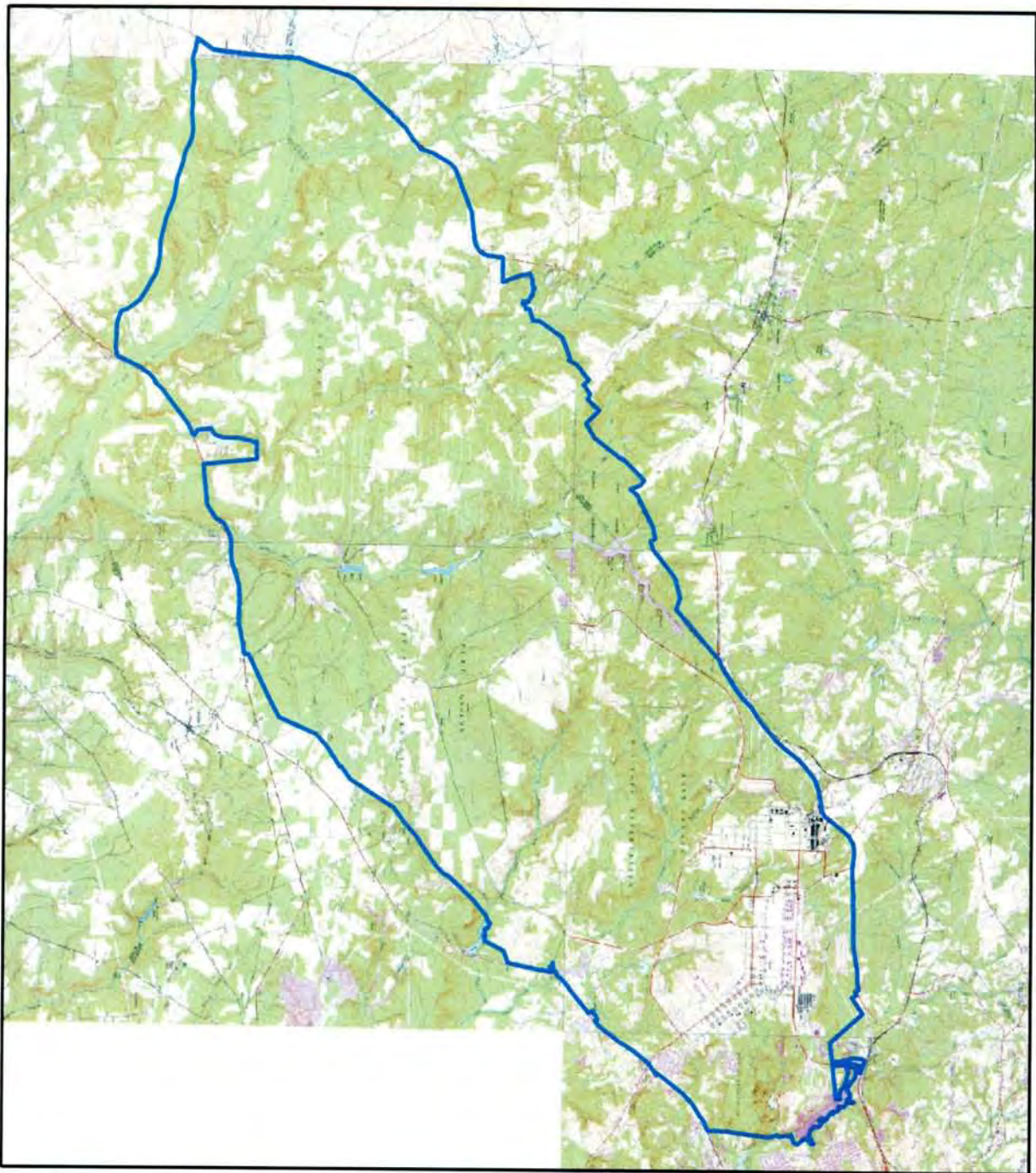
Appendix A. Fort Gordon property/boundary map.

Appendix B. UXO and Dud areas.

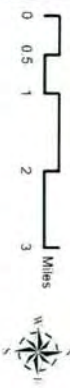
Appendix C. WWII Temporary buildings PA (DoD, ACHP, NCSHPO)

Appendix D. List of Tribal Historic Preservation Officers and/or other designated representatives of the Native American tribes with an affiliation or interest in cultural items found at Fort Gordon.

Appendix E. CD with all files listed above.



U.S. Army Garrison Fort Gordon
Directorate of Public Works and Logistics
Environmental Branch

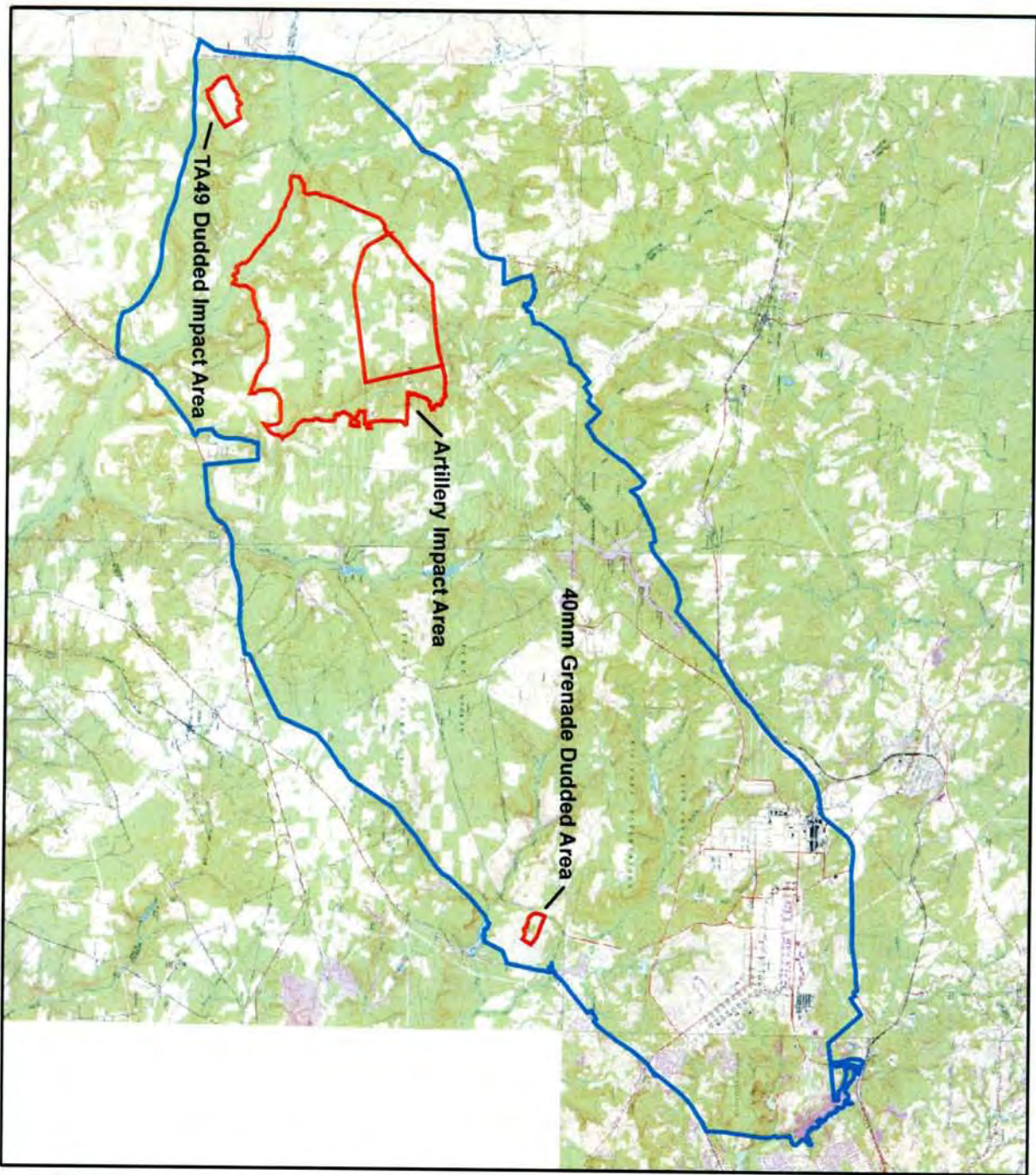


North American Datum 1983 UTM Zone 17N
Map produced by DPWL-EB

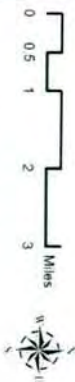
Legend
 Fort Gordon Boundary

Appendix Map 2 - Fort Gordon Unexploded Ordnance / Dudded Areas

U.S. Army Garrison Fort Gordon Fort Gordon, Georgia



U.S. Army Garrison Fort Gordon
Directorate of Public Works and Logistics
Environmental Branch



North American Datum 1983 UTM Zone 17N
Map produced by DPWL-EB

Legend
Fort Gordon Boundary
Dudded Area



PROGRAMMATIC MEMORANDUM OF AGREEMENT

AMONG

THE UNITED STATES DEPARTMENT OF DEFENSE

THE ADVISORY COUNCIL ON HISTORIC PRESERVATION

AND THE

NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS

WHEREAS, the Department of Defense (DoD) has been directed by United States Senate Armed Services Committee Report 97-440 to the Military Construction Authorization Bill for 1983 to demolish World War II (1939-1946) temporary buildings (buildings); and

WHEREAS, these buildings were not constructed to be permanent facilities and were intended to be demolished; and

WHEREAS, DoD has determined that these buildings may meet the criteria of the National Register of Historic Places; and

WHEREAS, DoD has determined that its program of demolition of these buildings (program) may have an effect on their qualities of significance and has requested the comments of the Advisory Council on Historic Preservation (Council) pursuant to Section 106 of the National Historic Preservation Act, as amended, (16 U.S.C. 470f) and its implementing regulations, "Protection of Historic and Cultural Properties" (36 CFR Part 800).

NOW, THEREFORE, DoD, the National Conference of State Historic Preservation Officers (NCSHPO), and the Council agree that the Program will be carried out in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

c I. DoD will ensure that the following actions are carried out:

A. In consultation with the Historic American Buildings Survey/Historic American Engineering Record (HABS/BAER) (National Park Service, Washington, DC), DoD will develop documentation that includes:

1. A narrative overview of WW II military construction establishing the overall historical context and construction characteristics of each major type of building and including:

a. Explanation of the origins and derivations of the construction techniques and designs.

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C/16/86

b. Chronology that summarizes the political and military decisions that affected scheduling, locations, quantity, design, and construction techniques. Photocopies shall be made of all military manuals used to guide significant aspects of design or construction...

c. Summary statements of major installations' WW II development including site plans, lists of buildings, photocopies of appropriate photographs, and evaluations of the significance of the various building types and groups.

2. Documentation of one example of all major building types that includes: drawings (title sheet, floor plans, sections, elevations, and isometrics of framing systems and other pertinent construction details), photographs (perspective corrected, large format negative and contact print), and appropriate explanatory data. All documentation shall meet HABS/HAER Standards for format and archival stability.

3. Submission of the above documentation to HABS/HAER, for deposit in the Library of Congress, not later than three years from the date of this agreement.

4. Development of the above documentation will be undertaken with periodic reviews by HABS/HAER to ensure that completed documentation will meet HABS/HAER Standards.

B. In consultation with the Council and the NCSHPO, DoD will select some examples of building types or groups to treat in accordance with historic preservation plans (HPP), until such time as demolished or removed from DoD control. The HPPs will be submitted to the Council and the NCSHPO within three years from the date of this agreement. Work done in accordance with the HPPs will require no further review by a SHPO or the Council.

C. All buildings that are identified within sixty days of the Federal Register publication of this Agreement by organizations and individuals will be considered by DoD in its selection of examples to be documented and/or treated in accordance with Stipulations A and B above.

D. Until the documentation program is completed and HPPs have been developed for the representative sample of building types and groups, DoD will continue its current program of building demolition with caution, avoiding disposal of obviously unique and well-preserved, original buildings that are not documented.

II. NCSHPO agrees to:

A. Assist the appropriate SHPO in informing DoD within sixty days of the Federal Register publication of this agreement of buildings that they wish to have considered in the selection of examples to be documented and/or treated in accordance with Stipulations I.A and I.B.

REPRODUCED AT GOVERNMENT EXPENSE

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6/6/86

B. Represent all SEPOs in the consultation on a selection of examples of buildings to be treated in accordance with Stipulation I.B.

III. If any of the signatories to this Agreement determines that the terms of the Agreement cannot be met or believes that a change is necessary, the signatory will immediately request an amendment or addendum to the Agreement. Such an amendment or addendum will be executed in the same manner as the original Agreement.

EXECUTION of this Agreement evidences that DoD has afforded the Council a reasonable opportunity to comment on its program of disposal of temporary WW II buildings and that DoD has taken into account the effects of this program on historic resources.

John W. Fule 7/2/86
Acting Executive Director, Advisory Council on Historic Preservation

Robert G. Stone
Department of Defense

Charles E. Lee 7/7/86
Chairman, Advisory Council on Historic Preservation

Department of Army

Charles E. Lee 6/6/86
President, National Conference of State Historic Preservation Officers

Department of Navy

U. S. Marine Corps

Robert A. Cooper 5/13/86
Historic American Buildings Survey/
Historic American Engineering Record

Department of Air Force

Appendix D.
Native American Tribal Contact List
Contacts current as of 11/17/2005

ALABAMA-QUASSARTE

Mr. Tarpie Yargee
Chief
Alabama-Quassarte Tribal Town
P.O. Box 187
Wetumka, OK 74883
405-452-3987
405-452-3968 fax
aqttchief@sbcglobal.net

CATAWBA

Mr. Gilbert Blue
Chairperson
Catawba Indian Tribe
P.O. Box 188
Catawba, SC 29704
803-366-4792
803-366-0629 FAX
catawbaone@aol.com

CHEROKEE NATION OF OKLAHOMA

Mr. Chadwick Smith
Principal Chief
Cherokee Nation of Oklahoma
P.O. Box 948
Tahlequa, OK 74465
918-456-0671
918-458-5580 Fax

Mr. Richard L. Allen
NAGPRA Contact
Cherokee Nation of Oklahoma
P.O. Box 948
Tahlequa, OK 74465-0948
918-456-0671 x466
918-458-5580 fax

CHICKASAW NATION OF OKLAHOMA

Mr. Bill Anoatubby

Governor
Chickasaw Nation of Oklahoma
P.O. Box 1548
Ada, OK 74821-1548
580-436-2603
580-436-4287 FAX

Ms. Giny (Virginia) Nail
NAGPRA Contact
Chickasaw Nation
P.O. Box 1548
Ada, OK 74821-1548
580-332-8685
580-436-4287 fax

EASTERN BAND OF CHEROKEE INDIANS

Mr. Mitchell Hicks
Principal Chief
Eastern Band of Cherokee Indians
P.O. Box 455
Qualla Boundary
Cherokee, NC 28719
828-497-2771
828-497-7007

Ms. Kathy McCoy
NAGPRA Contact
Eastern Band of Cherokee Indians
P.O. Box 455
Cherokee, NC 28719
704-497-9023

KIALEGEE

Ms. Evelyn Bucktrot
Town King
Kialegee Tribal Town
P.O. Box 332
Wetumka, OK 74883
405-452-3262
405-452-3413 fax

MUSCOGEE (CREEK) NATION

Mr. A.D. Ellis

Principal Chief
Muscogee (Creek) Nation
P.O. Box 580
Okmulgee, OK 74447
918-756-8700
918-756-2911 fax

Mrs. Joyce A. Bear
NAGPRA Contact
Muscogee (Creek) Nation of Oklahoma
P.O. Box 580
Okmulgee, OK 74447
918-756-8700 x603
918-756-1499 FAX
cultural@ocvnet.org

POARCH BAND OF CREEK INDIANS

Mr. Eddie Tullis
Chairperson
Poarch Band of Creek Indians
5811 Jack Springs Road
Atmore, AL 36502
251-368-9136
251-368-1026 FAX

Ms. Gale Thrower
NAGPRA Contact
Poarch Band of Creek Indians
5811 Jack Springs Road
Atmore, AL 36502
251-368-9136
251-368-4502 FAX

Ms. Stephanie Rolin
NAGPRA Contact
Poarch Band of Creek Indians
5811 Jack Springs Road
Atmore, AL 36502
251-368-9436
251-368-4502 fax

THLOPTHLOCCO

Mr. Louis McGertt
Town King

Thlopthlocco Tribal Town
P.O. Box 188
Okema, OK 74859
918-623-2620
918-623-1810

UNITED KEETOOWAH BANK OF CHEROKEE INDIANS

Mr. Dallas Proctor
Chief
United Keetoowah Band of Cherokee Indians
P.O. Box 746
Tahlequah, OK 74465
918-431-1818
918-431-1873 FAX

Mr. Charles Thurmond
NAGPRA Contact
Georgia Tribe of Eastern Cherokee
P.O. Box 1324
Clayton, GA 30525
706-746-2448
706-746-7561 FAX

Ms. Emma Sue Holland
NAGPRA Contact
United Keetoowah Band of Cherokee Indians
P.O. Box 746
Tahlequah, OK 74465
918-456-5491



Preserving America's Heritage

April 20, 2006

Mr. Robert Drumm
Cultural Resources Manager
Environmental Branch
Directorate of Public Works
Department of the Army
Headquarters, U.S. Army Garrison
307 Chamberlain Avenue
Fort Gordon, GA 30905-5730

Ref: Notification of Intent to Prepare Programmatic Agreement for the Operation, Maintenance, and Development of the Fort Gordon Army Installation at Fort Gordon, Georgia

Dear Mr. Drumm:

We are in receipt of your notification dated March 15, 2006, and supporting documentation regarding the intent to prepare a programmatic agreement for the operation, maintenance, and development of the Fort Gordon Army Installation at Fort Gordon, Georgia. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, " Protection of Historic Properties (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to develop this programmatic agreement is needed. However, should circumstances change and you determine that our participation is required, please notify us.

Please note, however, 36 C.F.R. 800.2(c)(2)(ii) requires the agency to consult with any Indian tribe that attaches religious and cultural significance to historic properties that may be affected by the proposed undertaking early in the planning process. This consultation must allow the tribe reasonable opportunity to identify its concerns about historic properties, advise on the identification and evaluation of historic properties, and participate in the resolution of adverse effects. It is the responsibility of the agency official to make a reasonable and good faith effort to identify Indian tribes that shall be consulted in the Section 106 process.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

1100 Pennsylvania Avenue NW, Suite 809 • Washington, DC 20004
Phone: 202-606-8503 • Fax: 202-606-8647 • achp@achp.gov • www.achp.gov

Thank you for providing us with this notification. If you have any questions or require the further assistance of the ACHP, please contact Kelly Yasaitis at 202-606-8583, or by EMAIL at kyasaitis@achp.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Reid Nelson".

Reid Nelson
Assistant Director
Federal Property Management Section
Office of Federal Agency Programs

Georgia Department of Natural Resources

Noel Holcomb, Commissioner

Historic Preservation Division

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer
34 Peachtree Street, N.W., Suite 1600, Atlanta, Georgia 30303
Telephone (404) 656-2840 Fax (404) 657-1040 <http://www.gashpo.org>

May 5, 2006

Robert Drumm
Cultural Resources Manager
Environmental Branch
ATTN: IMSE-GOR-PWE
Fort Gordon, Georgia 30905-5730

**RE: Programmatic Agreement - Draft
Fort Gordon: Programmatic Agreement for Operation, Maintenance and Development
Richmond, Columbia, McDuffie and Jefferson Counties, Georgia
HP060410-014**

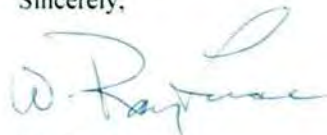
Dear Mr. Drumm:

The Historic Preservation Division (HPD) has reviewed the draft version of the Programmatic Agreement (PA) concerning effects to historic properties as a result of the above referenced undertaking. Our comments are offered to assist the Department of the Army in complying with the provisions of Section 106 of the National Historic Preservation Act.

HPD has reviewed the proposed PA covering Section 106 consultation between the DoD/US Army and the Georgia State Historic Preservation Officer (SHPO) for operations, maintenance, training, testing and development at US Army Garrison Fort Gordon in Richmond, Columbia, McDuffie and Jefferson Counties, Georgia, which may have an effect on properties listed in or eligible for listing in the National Register of Historic Places. As proposed, the stipulations regarding exempt activities, identification and evaluation of historic resources, internal review process, activities required SHPO review and annual reporting appear to be consistent with the *Secretary of the Interior's Standards for Treatment of Historic Properties*.

We look forward to receiving the final PA. If we may be of further assistance, please contact Elizabeth (Betsy) Shirk, Environmental Review Coordinator, at (404) 651-6624.

Sincerely,



W. Ray Luce
Division Director,
Deputy State Historic Preservation Officer

WRL/ECS

cc: Anne S. Floyd, Central Savannah River Area

Georgia Department of Natural Resources

Historic Preservation Division

Noel Holcomb, Commissioner

W. Ray Luce, Division Director and Deputy State Historic Preservation Officer
34 Peachtree Street, N.W., Suite 1600, Atlanta, Georgia 30303
Telephone (404) 656-2840 Fax (404) 657-1040 <http://www.gashpo.org>

June 20, 2006

Robert Drumm
Cultural Resources Manager
Environmental Branch
ATTN: IMSE-GOR-PWE
Fort Gordon, Georgia 30905-5730

**RE: Programmatic Agreement - Final
Fort Gordon: Programmatic Agreement for Operation, Maintenance and Development
Richmond, Columbia, McDuffie and Jefferson Counties, Georgia
HP060410-014**

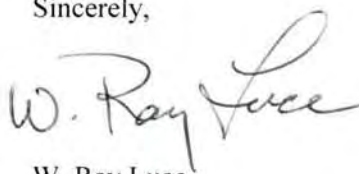
Dear Mr. Drumm:

The Historic Preservation Division (HPD) has reviewed the final version of the Programmatic Agreement (PA) concerning effects to historic properties as a result of the above referenced undertaking. Our comments are offered to assist the Department of the Army in complying with the provisions of Section 106 of the National Historic Preservation Act.

HPD agrees that the stipulations proposed in the PA are appropriate, and we have signed this agreement and are forwarding it to your office for review and further processing.

If we may be of further assistance, please contact Elizabeth (Betsy) Shirk, Environmental Review Coordinator, at (404) 651-6624.

Sincerely,



W. Ray Luce
Division Director,
Deputy State Historic Preservation Officer

WRL/ECS

cc: Anne S. Floyd, Central Savannah River Area
PA File