

INTEGRATED **C**CULTURAL **R**RESOURCES **M**MANAGEMENT **P**PLAN UPDATE



For Sites and Training
Installations of the
Washington Army National Guard



Fiscal Years 2014-2018



Prepared for

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ABBREVIATIONS AND ACRONYMS

AASF	Army Aviation Support Facility	EQCC	Environmental Quality Control Committee
ACHP	Advisory Council on Historic Preservation	ESOH	Environmental Safety and Occupational Health
ACSIM	Assistant Chief of Staff for Installation Management	FGDC	Federal Geographic Data Standards
AEDB-EQ	Army Environmental Database – Environmental Quality	FMS	Field Maintenance Shop
AFB	Air Force Base	FNSI	Finding of No Significant Impact
AHPA	Archaeological and Historic Preservation Act of 1974	FY	Fiscal Year
AIRFA	American Indian Religious Freedom Act of 1978	GIS	Geographic Information System
AR	Army Regulation	HABS	Historic American Building Survey
ARE	Army-Environmental	HAER	Historic American Engineering Record
ARNG	Army National Guard	HQDA	Headquarters, Department of the Army
ARPA	Archaeological Resources Protection Act	ICRMP	Integrated Cultural Resources Management Plan
APE	Area of Potential Effect	IFS	Integrated Facilities System
BIA	Bureau of Indian Affairs	INRMP	Integrated Natural Resources Management Plan
BLM	Bureau of Land Management	IPR	In-progress review
CAs	Cooperative Agreements	ISR	Installation Status Report
CCC	Civilian Conservation Corps	ITAM	Integrated Training Area Management
CEQ	Council on Environmental Quality	JAG	Judge Advocate General
CFR	Code of Federal Regulations	JBLM	Joint Base Lewis-McChord
CFMO	Construction and Facility Management Office	MATES	Maneuver Area Training Equipment Site
CRM	Cultural Resources Manager	MCRC	Marine Corps Reserve Center
CSMS	Combined Support Maintenance Shop	MFR	Memorandum for Record
CX	Categorical Exclusion	MILCON	Military Construction
DA	Department of the Army	MOA	Memorandum of Agreement
DCA	Departmental Consulting Archaeologist	MOU	Memorandum of Understanding
DFAC	Dining Facility	MVSB	Military Vehicle Storage Building
DoD	U.S. Department of Defense	NAGPRA	Native American Graves Protection and Repatriation Act of 1990
DoDI	Department of Defense Instruction	NBC	Nuclear, Biological, Chemical
DOI	Department of the Interior	NEPA	National Environmental Policy Act of 1969, as amended
DSCOPS	Operations Manager in the Directorate of Operations	NHPA	National Historic Preservation Act of 1966, as amended
EA	Environmental Assessment	NPS	National Park Service
EIS	Environmental Impact Statement	NRHP	National Register of Historic Places
EO	Executive Order	ODEP	Office of Director of Environmental Programs
EQ	Environmental Quality		

PA	Programmatic Agreement
PAO	Public Affairs Office
PL	Public Law
POC	Point of Contact
POTO	Planning Operations and Training Office
PRIDE	Planning Resources for Infrastructure Development and Evaluation
RC	Readiness Center
REC	Record of Environmental Consideration
RMDA	Records Management and Declassification Agency
RPI	Real Property Inventory
SDSFIE	Spatial Data Standards for Facilities, Infrastructure, and Environment
SHPO	State Historic Preservation Officer
SJA	Staff Judge Advocate
SOP	Standard Operating Procedure
SOW	Scope of Work
SPIRS	State Performance Indicator Reporting System
STAT	Statute
STEP	Status Tool for the Environmental Program
TAG	The Adjutant General
TDA	Table of Distribution and Allowance
THPO	Tribal Historic Preservation Officer
TOE	Table of Organization and Equipment
UFC	Unified Facilities Criteria
UPH	Unaccompanied Personnel Housing
USC	United States Code
USACE	U.S. Army Corps of Engineers
USACERL	U.S. Army Construction Engineering Research Laboratory
USAEC	U.S. Army Environmental Center
UTES	Unit Training Equipment Site
WAANG	Washington Air National Guard
WAARNG	Washington Army National Guard
YTC	Yakima Training Center

INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN REVISION
FOR
SITES AND TRAINING INSTALLATIONS OF THE
WASHINGTON ARMY NATIONAL GUARD

FISCAL YEARS 2014-2018

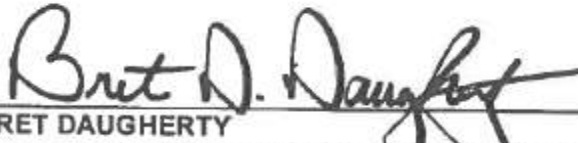
SIGNATURE PAGE

This Integrated Cultural Resources Management Plan (ICRMP) Update meets the requirements for ICRMPs set forth in Department of Defense Instruction 4715.16 Environmental Conservation Program, Army Regulation 200-1 *Environmental Protection and Enhancement*, and Army Pamphlet 200-1.

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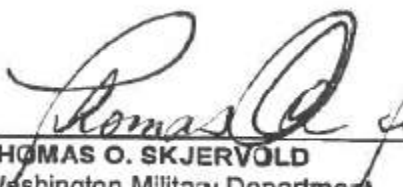
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EXECUTIVE SUMMARY

The Washington Army National Guard (WAARNG) has been managing cultural resources for several years under a previously developed Integrated Cultural Resources Management Plan (ICRMP). This revised ICRMP builds upon the original ICRMP in terms of including those elements identified as significant issues by internal and external stakeholders during the review process for the previous ICRMP, but differs from the previous ICRMP in several respects. First, this ICRMP Revision includes the following:

- *The addition of new policies and regulations such as Army Regulation (AR) 200-1, Executive Orders (EO) 13287 (Preserve America), EO 13327 (Federal Real Property Asset Management), and EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management), Department of Defense Instruction (DoDI) 4710.02, the Department of the Army's (DA) Program Comments on Unaccompanied Housing Structures and Ammunition Storage Facilities, and recent amendments to the National Historic Preservation Act (NHPA) and the Native American Graves Protection and Repatriation Act (NAGPRA)*
- *New guidance on the Army National Guard (ARNG) Status Tool for the Environmental Program (STEP) for project funding and data calls for the Army Environmental Database – Environmental Quality (AEDB-EQ) report, EO 13327, the Planning Resources for Infrastructure Development and Evaluation (PRIDE), the DoD Minimum Antiterrorism Standards for Buildings (Unified Facilities Criteria [UFC] 4-010-01), sustainability, and tribal consultation*



Bldg. 23 at Camp Murray before renovation

- *Introduction of new terminology for ARNG infrastructure: virtual installation, training installation, site, lot, and facility*
- *A focus on the results of the WAARNG cultural resources program over the past 5 years and how various successes and challenges have informed the goals and projects proposed for the program over the next 5 years.*
- *Streamlining of the Standard Operating Procedures (SOPs) such that guidance specific to the responsibilities of the WAARNG Cultural Resources Manager (CRM) is minimized (this guidance is now included in a CRM's Toolbox in Appendix I of the ICRMP Revision) and instructions for non-environmental personnel are emphasized. Flow charts have been added to each SOP to make them more comprehensible to the non-specialist.*

Secondly, this ICRMP Revision was developed from a template. The template was developed to standardize ICRMP format and content throughout the country and territories. Elements included within this ICRMP Revision include the input provided by internal and external stakeholders during development of the previous ICRMP, additional input from stakeholders obtained through the review process for the ICRMP Revision, and information provided by the WAARNG CRM. Internal and external stakeholders who participated in the development of both the original ICRMP and this ICRMP Revision include WAARNG and ARNG personnel, the State Historic Preservation Office (SHPO), and representatives of Native American Indian tribes.



Bldg. 23 at Camp Murray after renovation

Department of Defense Instruction 4715.16 and Army Regulation (AR) 200-1, require installations to develop an ICRMP as an internal compliance and management tool that integrates the entirety of the cultural resources program with ongoing mission activities. As a component of the installation master plan, the ICRMP is the Washington Army National Guard (WAARNG) commander's decision document for conduct of cultural resources management actions and specific compliance procedures. This ICRMP is an internal ARNG compliance and management plan that integrates the entirety of the state's cultural resources program requirements with ongoing mission activities. It also allows for ready identification of potential conflicts between the WAARNG mission and cultural resources, and identifies compliance actions necessary to maintain the availability of mission-essential properties and acreage.

This ICRMP Revision for the WAARNG is designed to support the military mission and assist individual installations in meeting the legal compliance requirements of federal historic preservation laws and regulations in a manner consistent with the sound principles of cultural resources stewardship. This ICRMP Revision establishes priorities for the identification and standards for the evaluation of cultural resources within the WAARNG virtual installation, and provides a schedule to accomplish program objectives during a 5-year program.



1923 Memorial: a contributing resource at Camp Murray's historic district

The ICRMP also provides a brief description of the WAARNG virtual installations, an overview of all known cultural resources across all WAARNG sites, the status of inventory and evaluation of resources at each site and training installation, and appropriate compliance and management activities for the next 5 years. The sites and training installations that comprise the WAARNG virtual installation are listed in Chapter 2 and Appendix D.

Cultural resources under the stewardship of the WAARNG can consist of archaeological sites, cultural landscapes, documents, buildings, and structures; American Indian sacred sites and properties of traditional, religious, and cultural significance; and previously collected artifacts. An inventory of cultural resources at the WAARNG sites listed above has been compiled based on the results of archaeological surveys, historic architectural evaluations, and archival and site record searches that have been completed to date. To date, 24 historic buildings and structures and 6 archaeological sites that are eligible/potentially eligible for listing on NRHP have been recorded on WAARNG sites and training installations.



Pump House at Camp Seven Mile: belongs to 22 features at a former CCC camp that are eligible for NRHP listing

WAARNG operational and training activities have the potential to impact cultural resources. Management actions proposed by the WAARNG under the original ICRMP to avoid or minimize impacts to cultural resources included:

Projects	Status
Development of historic preservation plan for maintenance of historic buildings at Camp Murray	Not initiated- Proposed for FY14
Integrate historic buildings, structures, landscape features, and eligible and unevaluated archaeological sites into the master plan as constraints. If any undertaking is proposed, conduct a review under section 106 of the NHPA and consult the Washington SHPO if an adverse effect on the property is likely.	On-going - Statewide master plan preparation is underway and cultural resources considerations are being integrated
Conduct a literature search, archaeological and architectural inventories, and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s) when acquiring new land or buildings	On-going/Recurring
Proposed location of Seattle readiness center – conduct archaeological inventory and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s).	Not initiated- Management has not identified specific location of the new Seattle RC
Proposed location of Olympia/Thurston County Readiness Center – conduct archaeological inventory and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s).	On-going- Management has identified location of the new RC but under negotiation
Proposed location of Pierce County Readiness Center – conduct archaeological inventory and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s).	On-going- Management has identified location of the new RC but under negotiation
Native American Consultation – determine tribal interest through the ICRMP development process.	On-going
Coordinate with the U.S. Army at Fort Lewis (now Joint Base Lewis-McChord or JBLM) and Yakima Training Center; the U.S. Air Force at Fairchild Air Force Base (AFB); and Washington State Parks Department at Camp Seven Mile to conduct joint efforts in Native American consultation, when appropriate.	On-going
Tribes, including tribal historic preservation officers, were provided with an opportunity to review the draft ICRMP and comment on the EA.	On-going
Develop a memorandum of agreement with a curation facility that meets the standards outlined in 36 CFR 79 at such time as an archaeological inventory results in the collection of artifacts.	Not initiated – Most of WAARNG facilities have low potential for archaeological resources.
Work with Camp Murray museum personnel to curate, store, and preserve building drawings, plans, and other documents.	On-going
Coordinate with the NGB records manager regarding collections and records.	Initiated
Assist in museum planning to make it and history a viable part of the WAARNG mission.	On-going

Of these, nine has been implemented. The remaining management actions were not implemented for reasons such as lack of site identified for the proposed construction project (e.g., new Seattle RC, Olympia RC) and changes in funding priority (e.g., preparation of historic preservation plan). A full discussion of the successes and challenges of the WAARNG cultural resources program over the past 5 years is provided in Chapter 2 of this ICRMP Revision.

Review of these successes and challenges with internal and external stakeholders has led the development of the following goals and proposed management actions for the WAARNG cultural resources program over the next 5 years:

- *Prepare maintenance/rehabilitation plans for the 24 NRHP-eligible historic buildings statewide.*
- *Evaluate all buildings, sites, structures and objects that will turn fifty years old for National Register eligibility after 2012.*
- *Continue collections assessment agreement with the University of Washington for the curation of WA National Guard Museum records/collections.*
- *Develop a statewide archaeological predictive model for Wenatchee U.S. Army Reserve Center and Yakima U.S. Marine Corps Reserve to best determine where to conduct archaeological resource surveys*
- *Compile and organize all maps, drawings, plans for all 24 NRHP-eligible historic structures statewide.*
- *Continue integrating cultural resources issues in NEPA documentations and installation planning documents*
- *Section 106 consultations for divestitures, demolition, maintenance and treatment plans for NRHP-eligible buildings, construction/renovation projects on historic structures, new land/structure acquisition, and any other future projects that involve ground disturbance or may impact historic structures.*

- *Continue coordination with WA National Guard State Historical Society regarding museum planning and collections management.*
- *Conduct energy efficiency evaluation for 24 NRHP-eligible historic structures statewide to identify areas for and recommended actions that could help in energy conservation.*
- *Conduct annual cultural resources training for site managers, field commanders and their troops, maintenance staff, and others who may encounter cultural resources in the course of performing their work.*
- *Develop cultural resources educational and promotional material – e.g., informational posters, signage, training exercises/presentation materials, and classes – for soldiers and other WAARNG personnel.*
- *Incorporate cultural resources information in new employee orientation presentation and Unit Environmental Compliance Officer training.*
- *Conduct an assessment of potential archaeological collections facility at Camp Murray by evaluating the existing historical museum (Bldg. 2) for meeting the requirements of 36 CFR Part 79.*
- *Conduct an archaeological survey for areas where structures were demolished.*

Implementation of these actions over the next five years will allow the WAARNG to efficiently meet their obligations of compliance with cultural resources legislation, while supporting the vital military mission at each of its sites and training installations. By implementing the management actions in this plan, the WAARNG goes beyond minimal compliance to accept the leadership role that the National Historic Preservation Act envisions for federal agencies to manage cultural resources in a spirit of stewardship for the inspiration and benefit of present and future generations.



FINAL
INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN REVISION
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1. Introduction

The WAARNG has been managing their cultural resource program under a previously developed Integrated Cultural Resources Management Plan (ICRMP). This ICRMP is an update of the plan prepared for the WAARNG for Fiscal Years (FY) 2008-2013, and represents an instruction manual for the cultural resources management program for FY 2014-2018.

This ICRMP 5-year revision differs from the previous ICRMP primarily in two areas. First, this ICRMP Revision includes:

- *The addition of new policies and regulations such as Army Regulation (AR) 200-1, Executive Orders (EO) 13287 (Preserve America), EO 13327 (Federal Real Property Asset Management), and EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management), Department of Defense Instruction (DoDI) 4710.02, the Department of the Army's (DA) Program Comments on Unaccompanied Housing Structures and Ammunition Storage Facilities, and recent amendments to the National Historic Preservation Act (NHPA) and the Native American Graves Protection and Repatriation Act (NAGPRA)*
- *New guidance on the ARNG Status Tool for the Environmental Program (STEP) for project funding and data calls for the Army Environmental Database – Environmental Quality (AEDB-EQ) report, EO 13327, the Planning Resources for Infrastructure Development and Evaluation (PRIDE), the DoD Minimum Antiterrorism Standards for Buildings (Unified Facilities Criteria [UFC] 4-010-01), sustainability, and tribal consultation*
- *Introduction of new terminology for ARNG infrastructure: virtual installation, training installation, site, lot, and facility*
- *A focus on the results of the WAARNG cultural resource program over the past 5 years and how various successes and challenges have informed the goals and projects proposed for the program over the next 5 years.*
- *Streamlining of the Standard Operating Procedures (SOPs) such that guidance specific to the responsibilities of the WAARNG Cultural Resources Manager (CRM) is minimized (this guidance is now included in a CRM's Toolbox in Appendix I of the ICRMP Revision) and instructions for non-environmental personnel are emphasized. Flow charts have been added to each SOP to make them more comprehensible to the non-specialist.*

Secondly, this ICRMP Revision was developed from a template. The template was developed to standardize ICRMP format and content throughout the country and territories. Elements included within this ICRMP Revision include the input provided by internal and external stakeholders during development of the previous ICRMP, additional input from stakeholders obtained through the review process for the ICRMP Revision, and information provided by the WAARNG Cultural Resources Manager (CRM). Internal and external stakeholders who participated in the development of both the original ICRMP and this ICRMP Revision include WAARNG and ARNG personnel, the State Historic Preservation Office (SHPO), and representatives of American Indian tribes. The WAARNG CRM provided state-specific information for the development of the ICRMP Revision including text describing cultural resources projects completed over the past 5 years, a review of program goals from the previous ICRMP and a summary of how those goals were or were not met, goals and projects developed for the next 5 years, and information on any new state regulations and requirements.

ICRMPs are required by internal military statutes and regulations, which include Army Regulation (AR) 200-1: *Cultural Resources Management*, Department of Defense (DoD) Instruction 4715.16: *Environmental Conservation Program*, and DoD Measures of Merit. The ICRMP is a 5-year plan that supports the military training mission through identification of compliance actions required by applicable federal laws and regulations concerning cultural resources management.

The WAARNG has both federal and state missions. The WAARNG federal mission, outlined in statutes and Regulations, is to maintain properly trained and equipped units available for prompt mobilization for war, national emergency, or as otherwise needed. The state mission is to provide trained and disciplined forces for domestic emergencies or as otherwise required by state laws. The Army also has an environmental mission to sustain the environment to enable the Army mission and secure the future.

This introductory chapter describes the purpose of the ICRMP, the goals of the WAARNG cultural resource program, the organization of the ICRMP, and outlines roles and responsibilities of both military and nonmilitary stakeholders.

1.1 Mission and Goals for the WAARNG Cultural Resource Program

The mission of the WAARNG cultural resource program is to support the WAARNG mission, achieve regulatory compliance, and ensure that WAARNG stewardship responsibilities are met. Fundamental to this mission is the identification of cultural resources and evaluation of their eligibility for listing in the National Register of Historic Places (NRHP). A successful cultural resources management program requires projects to identify and evaluate resources, implement protection and compliance actions (such as review of proposed undertakings under Section 106 of the NHPA), and collaborate with internal and external stakeholders to advance awareness and preservation.

Accordingly, the goals for the WAARNG cultural resource program are as follows:

- *Support Sustainable Training*
- *Protect Resources from Damage*
- *Conserve Resources and their Information for Future Generations*
- *Increase Cultural Resource Appreciation*
- *Contribute to Local, National and International knowledge base*
- *Facilitate Cultural Resources Awareness Training for soldiers and non-CRM personnel*
- *Maintain/Strengthen consultation between stakeholders*

To support these goals, the WAARNG has established measurable objectives to accomplish over the 5-year period covered by this ICRMP Revision; these are discussed in greater detail in Chapter 2:

- **Provide accurate landscape access data**
 - *Identify resource avoidance locations*
 - *Prepare maps showing cultural resources locations for agency staff's official use only*
- **Monitor resources for impacts**
 - *Off-road tactical vehicle maneuver*
 - *Bivouac/Stationing/Field training exercises*
 - *Inadvertent discovery/damage/destruction*
 - *Natural processes such as erosion, disaster damage*
 - *Demolition*
 - *Pest infestation resulting to damage*
- **Implement protective measures**
 - *Signage*
 - *Barriers (e.g., vegetation, landscaping, rocks, bollards), fences, siebert stakes*
 - *Overfill/Capping*
 - *Mitigation*
 - *Rehabilitation*

- **Implement conservation measures**
 - *Maintain artifacts, documentation, photos, maps, etc. in accordance with 36 CFR Part 79*
 - *Protect resources from further degradation*
 - *Develop maintenance and treatment plans for NRHP-eligible historic structures*

- **Integrate cultural resource management with Installation operations**
 - *Attend facilities meetings with Real Property, construction engineers, Range Control and ITAM personnel*
 - *Implement Standard Operating Procedures for addressing cultural resource issues throughout all WAARNG installations*

- **Implement regular consultation with stakeholders**
 - *Native Americans, Alaskan natives or Native Hawaiian Organizations as appropriate*
 - *State Historic Preservation Officer*
 - *Local historical societies*
 - *Interested parties as appropriate*

- **Increase public outreach**
 - *Incorporate cultural resources awareness in more Soldier Training Programs*
 - *Increase civilian and community awareness participatory activities*
 - *Publish articles locally, nationally, and internationally*
 - *Participate in regional and national cultural resources preservation awards/recognition programs and conferences*

1.2 Revised Real Property Definitions

All federally owned or controlled Army, ARNG, and Army Reserves installations having statutory and regulatory cultural resources management responsibilities must prepare and implement an ICRMP per AR 200-1. Further, ARNG guidance requires that all WAARNG holdings be included in the plan, regardless of whether they are state or federally owned because federal actions or funding might be implemented, which, in turn, triggers compliance with federal regulations.

Per the ARNG-ARI Memorandum dated 20 January 2006 regarding New Real Property Inventory Definitions of Installations and Sites, this ICRMP Revision uses the following new terminology for WAARNG infrastructure, as follows:

- **Parcel:** a parcel is a contiguous piece or pieces of land described in a single real estate instrument. A parcel can also be described as a specific area of land whose perimeter is delineated by metes and bounds or other survey methods. A parcel represents each individual land acquisition by deed or grant (i.e., each separate real estate transaction). A single real estate transaction may acquire multiple parcels. Each parcel is shown by a single lot record in the Real Property Inventory (RPI). Parcels are, therefore, the building blocks of land for a site. A parcel is created by a real estate transaction whereby a Military Department or the State acquires an interest in land, and a legal instrument evidences the interest so acquired.

- **Site:** in the broadest terms a site is a geographic location. In more focused terms, a site is a specific area of land consisting of a single parcel or several contiguous parcels. Each site must be able to produce a closed cadastral survey. A site can be any physical location that is or was owned by, leased to, or otherwise possessed by one Military Service or State (for National Guard purposes), to include locations under the jurisdiction of the Army National Guard (ARNG) where a hazardous substance has been deposited, stored, disposed of, placed, or otherwise came to be located. Do not combine Federal parcels with state parcels in a single site, even if contiguous. There will be no sites that contain both Federal and state owned property; create separate sites. A site may exist in one of three forms:

- Land only, where there are no facilities present and where the land consists of either a single parcel or two or more contiguous parcels.
- Facility or facilities only, where the underlying land is neither owned nor controlled by the Federal or State government. A stand-alone facility can be a site. If a facility is not a stand-alone facility, it must be assigned to a site.
- Land and all the facilities thereon, where the land consists of either a single parcel or two or more contiguous parcels.

Example of rule applied - a state or municipal owned road that traverses an area (i.e., the road only is granted by the easement, not the property underneath). The rule defines such an area as a single site if the military retains controls or ownership of the land under the road. However, if the road and the right-of-way along the road are owned by a party other than the Military Department (i.e., the road and the right-of-way [including property under the road] is granted in the easement), than this would be two sites since contiguous ownership does not exist.

- **Installation:** For real property purposes, an installation is a single site or a grouping of two or more sites for inventory reporting. Each State represents a single virtual installation consisting of all sites the State controls except sites designated as training installations. Training installations can be their own installations if they have their own command structure and if ARNG-ARI and ARNG-ART have jointly agreed that they may be listed as their own ARNG training installation. One or more sites may be assigned to any one installation but each can only be assigned to a single installation. An installation can exist in three possible forms:
 - A single site designated as an installation, (e.g., Camp Roberts, CA);
 - Several non-contiguous or contiguous sites grouped together as a single ARNG training installation (e.g., Camp Shelby, MS).
 - Several contiguous or non-contiguous sites grouped together as a single virtual installation, (e.g., ARNG manages all the sites in a single state as a virtual installation).

1.3 Organization of the ICRMP Revision

The ICRMP Revision has been organized to facilitate cultural resource management and compliance with AR 200-1 and federal and state cultural resources management regulations and requirements. The ICRMP Revision is organized into the following sections:

Chapter 1: Introduction to the ICRMP Revision. This chapter introduces the ICRMP Revision, purpose and goals for the cultural resources management program, document organization, and stakeholder reviews during development of the ICRMP Revision. This chapter also identifies the roles and responsibilities of WAARNG personnel, jurisdictional agencies, and stakeholders that are involved in the cultural resources compliance process.

Chapter 2: Cultural Resources Management Strategy. This chapter provides a summary of the goals and management actions proposed in the original ICRMP, and a discussion of how those goals were met and which management actions were completed. Challenges faced during implementation of the original ICRMP are also discussed. The data provided in this review are then used to inform the development of goals and management actions for the WAARNG cultural resources program over the next 5 years. This chapter also identifies stakeholder planned projects that could have an effect on cultural resources and recommendations for completing these projects in compliance with cultural resources management laws and regulations. Finally, this chapter provides discussions of the WAARNG's tribal consultation program and curation status of any collections under WAARNG control.

Chapter 3: Standard Operating Procedures (SOPs). WAARNG personnel, whose mission and responsibility is NOT the management of cultural resources, come into contact and could affect cultural

resources in the course of their work. This chapter provides SOPs to aid such personnel in identifying those situations and guiding their actions to ensure compliance and protect cultural resources.

Chapter 4: References and Resources. This chapter includes references and resources supporting the development of the ICRMP and the implementation of the cultural resources program.

Appendices: In contrast to the previous ICRMP, most of the guidance and reference materials have been moved to the appendices. **Appendix A** provides a glossary of important terms used in the ICRMP Revision. The remaining appendices are separated into two main categories: **Appendices B** through **G** include information completed by the WAARNG in support of the ICRMP Revision, such as the Record of Environmental Consideration (REC) and ICRMP Revision review correspondence, planning level survey information (historic contexts, predictive models) and summaries of cultural resources investigations completed at various sites and training installations, lists of identified archaeological sites and historic buildings and structures printed from the ICRMP database, copies of agreement documents negotiated by the WAARNG with other stakeholders, copies of annual ICRMP Revision reports submitted to ARNG over the past 5 years, the ICRMP Revision distribution list and contact information for stakeholders, and an appendix for internal use containing ICRMP and cultural resources management project funding requirements. **Appendices H** through **J** are primarily boilerplate text outlining current laws, regulations, and policies for cultural resources management, tools and guidance for the CRM, and sample documents (Memorandum of Agreement template, AEDB-EQ questionnaire, sample training brief).

The 12 required elements of an Army/ARNG ICRMP are listed in **Table 1-1**, along with information regarding where the element is found in the ICRMP Revision.

1.4 Information Gathering, Input, and Review for the Preparation of the ICRMP Revision

The ICRMP Revision is the WAARNG commander's decision document for cultural resources management and specific compliance procedures. This ICRMP Revision is an internal WAARNG compliance and management plan that integrates the entirety of the state's cultural resources program requirements with ongoing mission activities. It also allows for ready identification of potential conflicts between the WAARNG mission and cultural resources management through analysis of impacts from currently known mission actions and activities, and identifies compliance actions necessary to maintain the availability of mission-essential properties and acreage.

All cultural resources will be viewed as having the potential to contribute information of value to various groups, including the academic community, Tribes, local historical societies, people whose ancestors settled the area, and many others. Under the NHPA, it is the responsibility of the WAARNG to take into account the effects of its actions on cultural resources and to avoid, minimize, or mitigate any impacts that might result from its actions. The WAARNG also has the responsibility to identify and evaluate cultural resources present within the virtual installation, both as a proactive measure for planning purposes and to better assess the needs of the resources. In addition, the SHPO and Tribes must have an opportunity to participate in the identification and management of the cultural resources at each WAARNG site and training installation, and the general public and other stakeholders should be offered the opportunity to participate as well. A NEPA review is implemented for this ICRMP Revision. The appropriate NEPA analysis document (REC) is included in Appendix B.

Table 1-1. Twelve Elements of an Army ICRMP

ICRMP Element	Location in ICRMP Revision
Identification of all applicable legal requirements and procedures for integrating compliance between the various independent cultural resources legal requirements	Appendices H-I
Identification, to the extent possible, of specific actions, projects, and undertakings projected over a 5-year period that may require cultural resources legal compliance actions	Chapter 2
Development and implementation, as appropriate, of a cultural landscape approach to installations cultural resources management and planning	Chapter 2, Appendix I
A planning level survey that includes existing information on cultural resources, development of or references to existing historic contexts, an archaeological sensitivity assessment or archaeological predictive model, and a listing of any federally recognized American Indian tribes or Native Hawaiian organizations associated with the installation	Appendices C-D (planning level survey and description of known resources) Appendix E – tribal contacts
A plan for the actual field inventory and evaluation of cultural resources that is prioritized according to the inventory and evaluation requirements associated with specific installation compliance requirements, such as NHPA Section 106 undertakings, that could affect cultural resources. Any electronic spatial data produced by inventories shall conform to the Federal Information Processing Standards and spatial data standards for DoD to ensure that the spatial data are useable in various spatial data systems	Chapter 2
Internal procedures for consultation, survey inventory evaluations, treatment, recordation, monitoring, emergency or inadvertent discovery, reporting, etc., tailored for the particular conditions and specific requirements at the WAARNG virtual installation. Interface requirements between the cultural resource management program and other program areas (including but not limited to natural resources management, ITAM, master planning, facilities and housing, and mission-related training and testing activities) should be identified. The coordination processes within the installation and between the installation; Department of the Army (HQDA); regulatory agencies; and the interested public should be defined	Appendix I – Procedures Chapter 2 – Coordination Chapter 3 - SOPs
Provisions for curation of collections and records (36 CFR 79) that are associated with NHPA undertakings, and procedures to reduce the amount of materials that are accessioned and permanently curated by the WAARNG virtual installation	Chapter 2
Provisions for limiting the availability of cultural resources locational information for the purposes of protecting resources from damage	Chapter 2

ICRMP Element	Location in ICRMP Revision
Provisions and procedures for conducting an economic analysis and alternative use analysis on historic properties that are being considered for demolition and replacement	Appendix I
Procedures to ensure federally recognized tribes and Native Hawaiian organizations are provided access to sacred sites and are consulted when future access may be restricted, or when effects to the physical integrity of the sacred site may occur	Chapter 2, Appendix I
Development of standard treatment measures for cultural resources	Chapter 3
An estimate of resources required to execute the plan must have restricted access and be "For Official Use Only" due to the protection of government cost estimates	Appendix G

For these reasons, during the preparation of both the original ICRMP and this ICRMP Revision, information and input were/will be gathered from WAARNG personnel, agencies, and stakeholders to determine and resolve issues related to the management of cultural resources within the WAARNG virtual installation. This phase also included participation by any agency with jurisdiction by law or expertise (including the SHPO) and Tribes to obtain input early in the development process.

The WAARNG sent out copies of the Draft ICRMP Revision to agencies, tribes and other interested parties. The documents had also been posted on the agency's website.

This ICRMP Revision builds upon the comments provided during the development of the original ICRMP for the WAARNG, providing internal and external stakeholders with the opportunity to reexamine issues and procedures now that the first 5-year ICRMP cycle has been completed. **Tables 1-2** and **1-3** provide summaries of the topics on which various internal and external stakeholders provided input during the ICRMP implementation review process, and where these topics are addressed within this ICRMP Revision. **Appendix B** provides copies of all review correspondence, as well as the implemented REC for this ICRMP Revision. **Appendix E** includes a distribution list for the draft and final versions of this ICRMP Revision. **Appendix F** provides copies of the annual updates (which include comments received from stakeholders as part of the annual update process) completed since the implementation of the original ICRMP.

Table 1-2. Internal Stakeholder Information and Input Comments

Title/Area of Responsibility	Topics	Sections of ICRMP
Leadership – TAG, ATAG, Chief of Staff	Consult letters to Tribes	Appendix B
CFMO/Installation Management Team Director	No comment	
USPFO	No comment	
G3, Director of Operations	No comment	
Building Managers (historic buildings)	No comment	
ITAM Manager	No comment	
Environmental Quality Control Committee (EQCC), Public Affairs, Joint Forces)	PAO – Consult letters to Tribes	Appendix B

Table 1-3. External Stakeholder Information and Input Comments

Agency/Tribe	Topics	Sections of ICRMP
WA SHPO	Consulting SHPO when developing cultural education/training materials, in developing historic preservation plans, short- and long-term strategy on preservation of historic building slated for divestment, and development of policy/guidelines for disposal of historic properties	Executive Summary; Chapter 1
WAARNG Historical Society	No response.	
WA Air National Guard	No response.	
THPO / Federally-recognized Tribes		
Chehalis Confederated Tribes	No response.	
Colville Confederated Tribes	Okanogan Armory received 100% pedestrian survey and utilized by CCT since 2007 as part of the adaptive reuse plan. Section 106 is appropriate.	Throughout
Cowlitz Indian Tribe	No response.	
Confederated Tribes of the Umatilla Indian Reservation	No comments on ICRMP Update.	
Confederated Tribes of the Yakama Indian Nation	No response.	
Hoh Tribe	No response.	
Jamestown S’Klallam Tribe	No comment.	
Kalispel Tribe	No response.	
Lower Elwha Klallam Tribe	No response.	
Lummi Nation	No response.	
Makah Tribe	No response.	
Muckleshoot Tribe	No response.	
Nisqually Tribe	No response.	
Nooksack Tribe	No response.	
Port Gamble S’Klallam Tribe	No response.	
Puyallup Tribe	No response.	
Quileute Tribe	No response.	
Quinault Nation	No response.	
Samish Nation	No comment on the ICRMP.	
Sauk-Suiattle Tribe	No response.	
Shoalwater Bay Tribe	No response.	

Agency/Tribe	Topics	Sections of ICRMP
Skokomish Tribe	No response.	
Snoqualmie Tribe	No response.	
Spokane Tribe	No response.	
Squaxin Island Tribe	No response.	
Stillaguamish Tribe	Confidentiality of cultural resource information, 30-day review period, artifacts curation, consultation process, historic context and predictive models, and traditional cultural properties.	1.1, 1.5, Table 2-5, 2.4.2, 2.6, SOP #6, Appendix A, Appendix C, Appendix H and Appendix I
Suquamish Tribe	No response.	
Swinomish Tribe	No comment on the ICRMP.	
Tulalip Tribe	No response.	
Upper Skagit Tribe	Archaeological survey and consult for Sedro Woolley facility projects that may impact cultural resources	Throughout
Wanapum Band	No response.	
Non-federally Recognized Tribes		
Chinook Tribe	No response.	
Duwamish Tribe	No response.	
Kikialus Indian Nation	No response.	
Snohomish Tribe of Indians	No response.	
Snoqualmoo Tribe	No response.	
Steilacoom Indian Tribe	No response.	

1.5 Roles and Responsibilities

This section contains a list of WAARNG staff responsible for the implementation of the cultural resources management program and nonmilitary agencies and stakeholders that also have responsibilities to the program. Electronic links are created to AR 200-1 for a listing of the individual WAARNG staff responsibilities. **Appendix E** contains the point of contacts (POCs) for the Tribes and all other stakeholders.

Once the roles and responsibilities are established, there are opportunities to tailor the compliance process to operations and minimize impacts on the mission. Programmatic Agreements (Pas), under Section 106 of the NHPA, are a good tool that can be used to tailor NHPA compliance to installation-specific situations. Cooperative Agreements (CAs) under NAGPRA can help minimize or avoid mandatory 30-day shutdown periods where human remains might be discovered. The critical key to managing an effective cultural resources program is consulting early in project planning and maintaining open lines of communication with other involved entities.

1.5.1 Military Personnel Responsibilities

The Army, ARNG, and WAARNG personnel have important responsibilities for the implementation and success of the cultural resources management program. Participants in the management of cultural resources include the following:

ODEP: Carries out the Assistant Chief of Staff for Installation Management (ACSIM) Army staff function for the Army's Cultural Resources Management Program.

ARNG: ARNG provides funding for cultural resources program projects and compliance actions, and is the primary POC for installation requirements. The ARNG reviews the ICRMP for legal sufficiency and works with the state ARNG to respond to comments from stakeholders (SHPOs, Tribes, and interested parties). The commanding officer of ARNG-ARE must sign the FNSI after the ICRMP and EA have been through public review and comment periods under the NEPA, in order for the ICRMP and EA to be considered complete. ARNG-ARE reviews all other legal documents (PAs, MOAs, comprehensive agreements [CAs]) for legal sufficiency, provides for review of such documents by the ODEP/ACSIM, and is the primary signatory in addition to The Adjutant General (TAG).

WAARNG Virtual Installation:

- **CRM:** As appointed in accordance with AR 200-1 d(1)(a), provides day-to-day management for cultural resources, helps ensure that all WAARNG virtual installation activities are in compliance with applicable cultural resources requirements, serves as a liaison between all persons involved in the ICRMP, writes the ICRMP or develops its statement of work, and implements the ICRMP.
- **Directorate of Installation Management**, including
 - **Master Planner:** Should have the ICRMP as a component plan within the WAARNG virtual installation Master Plan and Design Guide.
 - **Construction Project Manager and Staff:** Should include time schedules for cultural resources consultation in their project design and delivery schedules. Might have a permitting system established for anyone who wants to dig on the installation. The CRM will review digging plans submitted to them and coordinate these activities with project managers, local tribes and consulting parties.
 - **Grounds and Facilities Maintenance Staff:** Are responsible for doing minor maintenance and repairs to installation property. Both the shops and work order section should have the current inventory of cultural resources, and should use the appropriate standards and techniques established for maintenance and repair of historic properties.
 - **Environmental Program:** The mission of the WAARNG Environmental Program office is to maintain an inventory of all known cultural resources present on lands owned or leased by the WAARNG to ensure that all actions that might impact those resources occur in compliance with federal and state legislation and balance the needs of preservation with the WAARNG mission. The CRM will review all proposed projects submitted to the Environmental Program and coordinate these activities with project managers, local tribes and consulting parties.
- **Finance Office:** Is responsible for the financial management and accounting for the WAARNG virtual installation's funds. They will track any cultural resources funds and are a source of information on funding.
- **Contracting Office:** Will give advice on spending funds to accomplish the cultural resources program. The contract office should be made aware of any legal requirements or agreements for cultural resources to ensure that contracts are consistent with those requirements.
- **Staff Judge Advocate (SJA):** Will review MOAs, PAs, CAs, Plans of Action, and any other legally binding cultural resources documents for legal sufficiency. They can also interpret the various laws and regulations related to cultural resources management.

- **Natural and Cultural Resources Manager:** Can provide background information concerning sites, environmental and geographic factors, surface disturbance, access, vegetation, wildlife, endangered species, wetlands, and other resources.
- **Directorate of Plans, Operations and Training:** Allocate and schedule the use of training lands to units for field exercises. They should have the current inventory of cultural resources found on the training lands and should be provided information on any agreement documents, the ICRMP, CAs, and pertinent regulations that could impact training.
- **Real property Office:** Primary source of data needed to determine if a building or group of buildings is eligible for the NRHP and should be coordinated with to track historic properties.
- **Public Affairs Office (PAO):** Can help find historic information concerning sites or activities and can assist in developing interpretive programs. The PAO can also assist in promoting the ICRMP to the public and the installation. The PAO can promote Historic Preservation Week (May) activities to increase public awareness.

1.5.2 Nonmilitary Participants

This section summarizes the roles of the following nonmilitary participants:

Advisory Council on Historic Preservation: The ACHP issues regulations to implement Section 106 of the NHPA; provides guidance and advice on the application of its regulations, 36 CFR Part 800; oversees the operation of the Section 106 process; and approves federal agency procedures for substitution of ACHP regulations.

State Historic Preservation Officer: The SHPO reflects the interests of the state or territory and its citizens in the preservation of their cultural heritage. In accordance with Section 101(b)(3) of the NHPA, the SHPO advises and assists the ARNG in carrying out its Section 106 responsibilities. The SHPO also advises and consults in the development of an ICRMP (see **Appendix H**). If a Tribe has assumed the responsibilities of the SHPO for section 106 on tribal lands under Section 101(d)(2) of the NHPA, TAG shall consult with the THPO, in lieu of the SHPO, regarding undertakings occurring on or affecting historic properties on tribal lands. The SHPO may participate as a consulting party if the Tribe agrees to include the SHPO.

Tribal Historic Preservation Officer: A THPO appointed or designated in accordance with the NHPA is the official representative of a Tribe for the purposes of section 106. If a Tribe has not assumed the responsibilities of the SHPO for Section 106 on tribal lands under Section 101(d)(2) of the NHPA, TAG shall consult with the Tribe in addition to the SHPO regarding undertakings occurring on or affecting historic properties on tribal lands (see **Appendix H**).

Tribes¹ Section 101(d)(6)(B) of the NHPA requires the ARNG commander to consult with any Tribe that attaches religious and cultural significance to historic properties that could be affected by an undertaking. Such consultation shall be on a government-to-government basis, and shall occur through the provisions of the NHPA and 36 CFR Part 800. It is the responsibility of TAG to seek to identify federally recognized tribes and Native Hawaiian organizations that shall be consulted pursuant to Section 106 of the NHPA (see Chapter 2 and **Appendices H and I**).

Interested Parties and the Public: The installation shall seek and consider the views of the general public and any other interested parties regarding the development and implementation of the ICRMP (see **Appendix B**), including historic preservation organizations.

¹ The word “Tribes” (with a capital T) is used inclusively throughout this ICRMP to include American Indian tribes, Alaska Natives and organizations, Native Americans, and Native Hawaiians, and organizations as defined in the National Historic Preservation Act and the Native American Graves Protection and Repatriation Act.

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2. Cultural Resource Management Strategy

This chapter provides an overview of the WAARNG cultural resources program, its successes and challenges over the past 5 years related to the implementation of the previous ICRMP, the status of Section 110 investigations at each site and training installation, and appropriate compliance and management activities for the next 5 years. In addition, WAARNG projects planned for the next 5 years that require cultural resources compliance and management activities are identified.

2.1 WAARNG Cultural Resources within the Virtual Installation

The term “virtual installation” refers to all WAARNG facilities statewide and includes any lands or facilities used by, operated by, or operated on behalf of the WAARNG, regardless of who owns those lands. The virtual installation consists of permanent facilities which function as training areas, combined support maintenance shops, readiness centers/armories, field maintenance shops, aviation support facilities, and administrative offices. All of the sites and training installations discussed in this ICRMP revision are either federally owned or supported with federal funds. Lands controlled or impacted by the WAARNG on a one-time basis are also considered part of the WAARNG virtual installation even if they are privately owned, with the most relevant example being “local training areas” or LTAs.

The WAARNG virtual installation includes 247 buildings/structures (of which 71 are 50 years or older) and about 924 acres within 40 sites and training installations (see **Appendix D**).

The inventory of cultural resources managed by the WAARNG includes 24 NRHP-eligible structures and 6 archaeological sites. **Table 2-1** provides a list of the WAARNG sites and training installations with notes concerning the status of inventories and evaluations as stipulated under Section 110 of the NHPA. The majority of buildings and structures aged 50 years or older within the WAARNG real property inventory have been evaluated for National Register eligibility; projects to inventory buildings and structures that have turned 50 years old or that will turn 50 years old by 2012 have been programmed for funding. Archaeological surveys have been completed for six (intensive pedestrian survey) and 12 (reconnaissance/site file check) of 40 WAARNG sites. Archaeological surveys (intensive pedestrian survey) of Camp Murray and Camp Seven Mile (the two WAARNG training installations) are 100% complete. Together, 438 acres of the 506 acres within the WAARNG virtual installations that are accessible for archaeological survey (excludes acreage beneath buildings and pavement) have been surveyed. Of the 100% pedestrian surveyed acreage, 328 acres accessible areas are federal lands while 110 acres of accessible areas are state lands. The rest of the accessible areas underwent an archaeological resource assessment. No traditional, religious, or cultural significance to Native American tribes have been recorded on WAARNG lands; however, the WAARNG maintains an ongoing consulting relationship with interested Native American tribes to ensure that WAARNG actions do not adversely affect significant tribal resources.

2.2 Management Actions

This section summarizes the specific actions required to manage the cultural resources under the stewardship of the WAARNG for the next 5 years, as well as summarizing the actions taken over the past 5 years. Cultural resource actions can include initiation or continuation of Native American consultation not related to a specific project, GIS cultural resource layer development, development of a cultural resource training and awareness program for non-CRM staff, CRM training, development of agreement documents, and fulfillment of federal curation requirements.

Table 2-1. Status of NHPA Section 110 Inventory and Evaluation

Site/Installation	Total # of buildings/ structures	# of buildings 50 yrs or older	# of buildings evaluated	# of eligible buildings	Total Acreage	Total accessible acreage	Total acreage surveyed	# of identified archaeological sites	# of archaeological sites evaluated	## of eligible archaeological sites
Anacortes (53A10)	3	1	1	1 (RC)	4	1	1	0	0	0
Bellingham (53A15)	4	1	1	0	6	0.9	0.9	0	0	0
Bremerton RC (53A25)	2 ^o	1	1	1	0.2	0	0	0	0	0
Buckley (53A27)	2	0	0	0	10	2	2 ^a	0	0	0
Camp Murray (53555)	92	27	27	7 ^φ	240	110	110 ^φ	14	14	2
Camp Seven Mile (53735)	0	0	0	0	328	328	328	7	7	4 ^b
Centralia (53A35)	3	3	3	2	8	5.6	5.6 ^a	0	0	0
Ephrata (53A57)	6	0	0	0	13	1	1 ^a	0	0	0
Everett ^φ (53A60)	1	1	1	0	1	0	0	0	0	0
Grandview (53A63)	1	0	0	0	11	0	0	0	0	0
JBLM Gray Army Airfield/AASF 1 (53B65)	8	0	0	0	1.9	1	1	0	0	0
JBLM Log Center/UTES (53B77)	2	0	0	0	0.6	0.1	0.1	0	0	0
JBLM 66 th Aviation RC (53B65)	1	0	0	0	25.8	2.6	2.6	0	0	0
Kennewick Storefront (53444)	1	0	0	0	0.1	0	0	0	0	0
Kent (53743)	8	6	6	0	15	2.25	2.25 ^a	0	0	0
Lacey Storefront (53R30)	1	0	0	0	0.1	0	0	0	0	0
Lakewood Storefront (53R20)	1	0	0	0	0.1	0	0	0	0	0
Lynnwood Storefront (53073)	1	0	0	0	0.1	0	0	0	0	0

Site/Installation	Total # of buildings/structures	# of buildings 50 yrs or older	# of buildings evaluated	# of eligible buildings	Total Acreage	Total accessible acreage	Total acreage surveyed	# of identified archaeological sites	# of archaeological sites evaluated	## of eligible archaeological sites
Longview (53A70)	3	2	2	2	4	1.2	1.2	0	0	0
Marysville (AFRC) (53132)	3	0	0	0	1.6	0.05	0.05 ^h	0	0	0
Montesano RC (53A75)	4	0	0	0	14	7	7	0	0	0
Moses Lake RC (53A77)	2	0	0	0	10	2.5	2.5	0	0	0
Okanogan RC ^{ph} (53A80)	3	3	3	0	4	0.8	0.8	0	0	0
Olympia (53A85)	3	2	2	1 (RC)	2	0.8	0.8	0	0	0
Pasco (53A90)	3	2	2	0	1	0.1	0.1	0	0	0
Port Orchard (53B00)	3	2	2	0	9	5.4	5.4	0	0	0
Pullman ^{ph} (53B10)	2	1	1	0	1	0	0 ^a	0	0	0
Puyallup RC & Maintenance Shop (53B15)	3	2	2	2	2	0.4	0.4 ^a	0	0	0
Puyallup Storefront (53R01)	1	0	0	0	0.1	0	0	0	0	0
Redmond (53755)	6	5	5	5	11	3.3	3.3	0 ^a	0	0
Seattle Pier 91 (53B25)	8	0	0	0	16	1.6	1.6 ^a	0	0	0
Seattle Boeing Field (53130)	6	0	0	0	7.5	0.1	0.1 ^h	0	0	0
Seattle Storefront (53R60)	1	0	0	0	0.1	0	0	0	0	0
Sedro-Woolley (FMS3) (53B27)	2	0	0	0	10	6	6	0	0	0
Snohomish (53B35)	2	2	2	2	1	0	0	0	0	0
Spokane Fairchild AFB (53B60)	1	0	0	0	0.4	0	0	0	0	0
Spokane Fairchild AFRC (53390)	5	0	0	0	1	0	0 ^h	0	0	0
Spokane Geiger Field (53B55)	11	4	4	0	20.4	4	4	0	0	0

Site/Installation	Total # of buildings/ structures	# of buildings 50 yrs or older	# of buildings evaluated	# of eligible buildings	Total Acreage	Total accessible acreage	Total acreage surveyed	# of identified archaeological sites	# of archaeological sites evaluated	## of eligible archaeological sites
Spokane Storefront (53716)	1	1 ^f	0	0	0.1	0	0	0	0	0
Spokane New RC (53391)	4	0	0	0	6	2.4	2.4	0	0	0
Spokane Storefront Valley Mall (53R02)	1				0.1	0	0	0	0	0
Vancouver AFRC (53229)	3	0	0	0	1.4	0	0 ^h	0	0	0
Vancouver Storefront (53R90)	1	0	0	0	0.1	0	0	0	0	0
Walla Walla (53B95)	3	2	2	1	1	0.1	0.1 ^a	0	0	0
Wenatchee USARC (53965)	2	0 ^e	0 ^e	0	2	0	0 ^a	0	0	0
Wenatchee RC (53C00)	3	3	3	0	5	1.5	1.5 ^a	0	0	0
Yakima YTC ^g (AFRC, MATES, CHP/T271, RC/870, 951/Old MATES) (53C15)	15	1	1	0	110	11.7	11.7	0	0	0
Yakima Airport (RC) (53C30)	2	0	0	0	9.9	1	1 ^a	0	0	0
Yakima USMCR (53C08)	3	0	0	0	4.9	1.2	1.2 ^{**}	0	0	0
TOTAL	247	72	71	24	924	506	506	21	21	6

archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources

^{**}estimated probability for archaeological resources completed; considered to retain high potential for archaeological resources

^areconnaissance survey done in 2004; low potential for buried cultural deposits

^bone out of 4 is potentially eligible

^gnot surveyed because not WAARNG-owned land; YTC lands had been surveyed in the past by YTC; AFRCs environmental documentation taken care of by US Army Reserve.

^econflicting information on built date (FISP lists Jan 1968 but ICRMP says 1954)

^faccessible areas are now State property and managed by WA Youth Academy; only the new RC is operated by WAARNG; the old RC is NRHP-eligible

^hBldg. 118 is already listed to NRHP; 110 ac of accessible areas surveyed in 2004; new main gate construction would reduce accessible areas to about 100 ac

2.2.1 Summary and Results of the 2008-2013 ICRMP

Actions proposed in support of the WAARNG cultural resources management program in the original WAARNG ICRMP (2008-2013) included:

1. Development of historic preservation plan for maintenance of historic buildings at Camp Murray.
2. Integrate historic buildings, structures, landscape features, and eligible and unevaluated archaeological sites into the master plan as constraints. If any undertaking is proposed, conduct a review under section 106 of the NHPA and consult the Washington SHPO if an adverse effect on the property is likely.
3. Conduct a literature search, archaeological and architectural inventories, and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s) when acquiring new land or buildings
4. Proposed location of Seattle readiness center – conduct archaeological inventory and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s).
5. Proposed location of Olympia/Thurston County Readiness Center – conduct archaeological inventory and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s).
6. Proposed location of Pierce County Readiness Center – conduct archaeological inventory and consult with the appropriate federally recognized American Indian tribes to identify the presence of resources of concern to the tribe(s).
7. Native American Consultation – determine tribal interest through the ICRMP development process.
8. Coordinate with the U.S. Army at Fort Lewis and Yakima Training Center; the U.S. Air Force at Fairchild Air Force Base (AFB); and Washington State Parks Department at Camp Seven Mile to conduct joint efforts in Native American consultation, when appropriate.
9. Tribes, including tribal historic preservation officers, were provided with an opportunity to review the draft ICRMP and comment on the EA.
10. Develop a memorandum of agreement with a curation facility that meets the standards outlined in 36 CFR 79 at such time as an archaeological inventory results in the collection of artifacts.
11. Work with Camp Murray museum personnel to curate, store, and preserve building drawings, plans, and other documents.
12. Coordinate with the NGB records manager regarding collections and records.
13. Assist in museum planning to make it and history a viable part of the WAARNG mission.

An assessment of the success of the WAARNG in implementing the previous 5-year plan reveals that 9 of these actions are on-going and one was initiated. The development of historic preservation plan for historic building maintenance was not implemented due to budget constraints. Archaeological inventory for the proposed locations of new Seattle and Olympia readiness centers have not been initiated since the management has not identified the specific locations for these new RCs. At present, WAARNG is preparing a 25-year statewide master plan that will take into account potential cultural resources constraints. A Camp Murray master plan that also integrated cultural resources constraints specific for the installation was drafted in 2010 but has not been finalized due to changes in management plans. With regard to Native American consultation, the WAARNG coordinates with Cultural Resources Managers at both Joint Base Lewis-McChord's (formerly Fort Lewis) and Yakima Training Center for actions that may impact cultural and/or archaeological resources. Section 106 consultation with the SHPO and Tribes has been done on all projects that may impact cultural/ archaeological resources.

The WAARNG has relatively limited number of cultural resources collections. In FY2011, WAARNG entered into an agreement with the University of Washington (UW) Special Collections Division to conduct an assessment of the museum materials and do basic preservation and initial processing of collections in preparation for the curation/preservation phase. A preliminary report on the results of assessment was provided to WAARNG in February 2012. Another agreement with the UW to continue the collections assessment work was signed in FY2013. The WAARNG's CRM continues to work with Washington National Guard State Historical Society who manages Camp Murray museum in the storage, preservation/curation

and planning of collections and records being an important component of WAARNG's mission. The WAARNG's CRM has also initiated communication with ARNG headquarters regarding the preservation of WAARNG's collections.

In addition to these broader actions, the previous ICRMP outlined a number of training installation-and site-specific inventory and evaluation projects to be completed by 2012 (**Table 2-2**). A number of these projects have been completed as planned; the WAARNG will strive to complete the remaining projects during the period covered by this ICRMP (FY 2014-2018).

2.2.2 Goals and Objectives for the 2014-2018 ICRMP Revision

Based on the analysis of successes and challenges associated with the implementation of the previous ICRMP, the WAARNG has prepared the following updated list of installation-wide management actions to be completed over the next 5 years:

1. Prepare maintenance/rehabilitation plans for the 24 NRHP-eligible historic buildings statewide (Anacortes Armory, old Bremerton Readiness Center, Camp Murray Bldgs. 1, 2, 7, 23, 24, 26 and 118; Redmond Bldgs. 415, 500, 501, 506 and 507; Centralia Armory, Centralia Armory Maintenance Shop, Longview Armory, Longview Armory Maintenance Shop, Olympia Armory, Puyallup Armory, Puyallup Armory Maintenance Shop, Snohomish Armory, Snohomish Armory Maintenance Shop and Walla Walla Armory). Tacoma Armory was excluded as it had just been divested. Invite DAHP to participate in reviewing the scope and content of the plan.
2. Continue to evaluate for National Register eligibility all buildings, sites, structures and objects that will turn fifty years old after 2013.
3. Continue collections assessment agreement with the University of Washington for the curation and rehabilitation of WA National Guard Museum records and collections.
4. Compile and organize all maps, drawings, plans for all 24 NRHP-eligible historic structures statewide.
5. Continue integrating cultural resources issues in NEPA documentations.
6. Continue Section 106 consultations for divestitures (Tacoma armory, Centralia armory), demolitions (e.g. Combined Support Maintenance Shop at Camp Murray; Kent buildings), maintenance and master plans, new land/structure acquisition and construction projects (Tactical Unmanned Aircraft Systems facility at YTC, Barracks/DFAC at YTC, Pierce County Readiness Center, Thurston County Readiness Center, Seattle Readiness Center), AT/FP standards development for historic structures.
7. Continue coordination with WA National Guard State Historical Society regarding museum planning and collections management.
8. If feasible, conduct energy efficiency evaluation for 24 historic structures statewide to identify areas for and recommended actions that could help in energy conservation. The Secretary of Interior's Standards for Rehabilitation will be used to guide policy on adapting structures for purposes of energy efficiency.
9. Conduct annual cultural resources training for training site managers, field commanders and their troops, maintenance staff, and others who may encounter cultural resources in the course of performing their work.
10. Develop cultural resources educational and promotional material – e.g., informational posters, signages, training exercises/presentation materials, and classes – for soldiers and other WAARNG personnel. Contact DAHP for reviewing, planning, and/or participating in this effort.
11. Incorporate cultural resources information in new employee orientation presentation and Unit Environmental Compliance Officer training.
12. Conduct an assessment of potential archaeological collections facility at Camp Murray by evaluating the existing historical museum (Bldg. 2) for meeting the requirements of 36 CFR Part 79.
13. Conduct an archaeological survey for areas where structures were demolished.

Table 2-2. Status of Training Installation- and Site-specific Projects from Previous ICRMP

Site/Installation	Project #	Description	Status
Bellingham	STEP Proj. # WA0NG100001	<ul style="list-style-type: none"> Evaluate building 00002 in fiscal year (FY) 2010 	<ul style="list-style-type: none"> Completed in FY11- determined not eligible by recorder
Bremerton	STEP Proj. # WA0NG100001	<ul style="list-style-type: none"> Manage NRHP-eligible building 00001 Evaluate building 00006 in FY 2010 	<ul style="list-style-type: none"> Recurring – Bldg. #1 was re-evaluated in FY11 and was found no longer eligible for NRHP listing by recorder. SHPO did not concur. Completed in FY11 – Bldg. #6 demolished in 2004 but was not reported in ICRMP
Camp Murray	None STEP Proj. # WA000080004 STEP Proj. # WA0NG100001	<ul style="list-style-type: none"> Manage historic district and landscape features: buildings 00001, 00002, 00007, 00023, 00024, and 00026 Monitor NRHP-eligible and unevaluated archaeological sites: 45PI720, and 45PI721, CMS-7. Evaluate building 00037 in FY 2010 	<ul style="list-style-type: none"> Recurring On-going for FY12- informational signage created for 45PI721; informational signage proposed for 45PI720; informational signage proposed for CMS-7 Completed in FY11 – determined ineligible by recorder
Centralia	None	<ul style="list-style-type: none"> Manage NRHP-eligible building 00001 (armory) Evaluate the Flammable Materials Storage Shed 	<ul style="list-style-type: none"> Recurring until divested Evaluated in FY13 – determined not eligible by recorder
Fort Lewis (now Joint Base Lewis-McChord)	None	<ul style="list-style-type: none"> Consult with the Fort Lewis cultural resource manager (CRM) at 253.966.1785 prior to any undertaking or ground disturbance 	<ul style="list-style-type: none"> Recurring
Kent	STEP Proj. # WA0NG100001	<ul style="list-style-type: none"> Evaluate buildings slated for demolition (504, 505, 507) 	<ul style="list-style-type: none"> Evaluated in FY13 – determined not eligible by recorder
Longview	None	<ul style="list-style-type: none"> Manage NRHP-eligible building 00001 	<ul style="list-style-type: none"> Recurring

Site/Installation	Project #	Description	Status
Olympia	None	<ul style="list-style-type: none"> • Manage NRHP-eligible building 00001 	<ul style="list-style-type: none"> • Recurring
Puyallup	None	<ul style="list-style-type: none"> • Manage NRHP-eligible building 00001 	<ul style="list-style-type: none"> • Recurring
Redmond	None	<ul style="list-style-type: none"> • Manage historic district and landscape features: buildings 00415, 00500, 00501, 00506, and 00507 	<ul style="list-style-type: none"> • Recurring
Snohomish	None	<ul style="list-style-type: none"> • Manage NRHP-eligible building 00001 • Evaluate building 00003 in FY 2010 	<ul style="list-style-type: none"> • Recurring • Evaluated in 2005 and determined ineligible by recorder
Spokane	None STEP Proj. # WAONG100001	<ul style="list-style-type: none"> • Geiger Field – Archaeological inventory or site file check needed, document memorial • Evaluate buildings 200 (Storage Building), 300 (Vehicle Maintenance Shop), 400 (Hazardous Materials Storage Building) and 2514 (Storage Building) in FY13 	<ul style="list-style-type: none"> • Not initiated • Evaluated in FY13 – determined not eligible by recorder
Spokane	None	<ul style="list-style-type: none"> • Camp Seven Mile – Monitor eligible archaeological sites: 45SP279, 45SP476, 7M-5, 45SP478, and 45SP477 • If any undertaking is proposed, apply regulations of section 106 of the NHPA and consult the Washington SHPO and appropriate federally recognized American Indian tribes if an adverse effect on the property is likely • Site 45SP477 is recommended for further research to determine the site's temporal and cultural affiliation, as well as research potential and eligibility 	<ul style="list-style-type: none"> • Recurring
Tacoma	None	<ul style="list-style-type: none"> • Manage NRHP-eligible building 00001 	<ul style="list-style-type: none"> • Divested in FY12
Toppenish	None	<ul style="list-style-type: none"> • Manage NRHP-eligible building 00001 	<ul style="list-style-type: none"> • Divested in FY11
Vancouver Barracks	None	<ul style="list-style-type: none"> • Manage NRHP-eligible building 993. Consultation with the WAARNG CRM is recommended prior to any undertaking or ground disturbance within the installation, maintenance, and/or construction on any of the four buildings due to their location within or near a historic district and site. Recognize the efforts by the city of Vancouver to preserve the Vancouver National Historic Reserve 	<ul style="list-style-type: none"> • Divested in FY11
Walla Walla	None	<ul style="list-style-type: none"> • Manage NRHP-eligible building 00001 	<ul style="list-style-type: none"> • Recurring
Wenatchee U.S. Army Reserve Center	None	<ul style="list-style-type: none"> • Archaeological inventory or predictive model is needed 	<ul style="list-style-type: none"> • Not completed

Site/Installation	Project #	Description	Status
Yakima Training Center	None	<ul style="list-style-type: none"> Consult with Yakima CRM (509.577.3535) prior to ground-disturbing activities or undertaking 	<ul style="list-style-type: none"> Recurring
Yakima U.S. Marine Corps Reserve	None	<ul style="list-style-type: none"> Archaeological inventory or predictive model is needed 	<ul style="list-style-type: none"> Not completed

To aid in implementing these management actions, the WAARNG has programmed a number of site and training installation-specific projects between FY 2014-2018. New projects identified as part of the development of this ICRMP Revision are shown in **Table 2-3**.

Table 2-3. Cultural Resources Management Projects for FY 2014-2018

Site/Installation	Project #	Description	Proposed FY for Completion
Statewide		<ul style="list-style-type: none"> Update the ICRMP 	2018
Statewide		<ul style="list-style-type: none"> Evaluate buildings that reach the 50 year benchmark for NRHP listing eligibility 	As needed
Statewide		<ul style="list-style-type: none"> Preparation of maintenance and treatment plans for the 24 historic structures statewide 	2014
Anacortes	STEP Proj. # WA0NG100001	<ul style="list-style-type: none"> Evaluate Bldg. 00001 (armory) Manage historic building 	Evaluated in FY13 – determined NRHP-eligible by recorder Recurring
Bremerton		<ul style="list-style-type: none"> Manage historic building. 	Recurring
Centralia		<ul style="list-style-type: none"> Manage historic building. 	Recurring
Camp Murray		<ul style="list-style-type: none"> Design and install informational signage on historic/cultural resources Manage historic district and landscape features: Buildings 00001, 00002, 00007, 00023, 00024, and 00026 as well as NRHP-eligible and known archaeological sites. 	2014 Recurring
Camp Seven Mile		<ul style="list-style-type: none"> Manage archaeological resources at the installation Design and install informational signage for archaeological resources at the installation 	Recurring 2015
Joint Base Lewis-McChord	530015	Consult with JBLM's CRM prior to any ground-disturbing activities. Construction of Information/Operations Readiness Center (I/O RC) has been coordinated with JBLM's CRM and is covered by the existing PA associated with JBLM's Grow the Army EIA.	Recurring
Longview		<ul style="list-style-type: none"> Manage historic buildings: armory and maintenance shop 	Recurring
Olympia		<ul style="list-style-type: none"> Manage historic building 	Recurring

Site/Installation	Project #	Description	Proposed FY for Completion
Pierce County RC		<ul style="list-style-type: none"> Conduct an archaeological site file check/survey and SHPO/Tribal consultations prior to construction 	FY14
Puyallup		<ul style="list-style-type: none"> Manage historic buildings: armory and maintenance shop 	Recurring
Redmond		<ul style="list-style-type: none"> Manage historic district: Buildings 415, 500, 501, 506 and 507 	Recurring
Snohomish		<ul style="list-style-type: none"> Manage historic buildings: armory and maintenance shop. 	Recurring
Spokane (Fairchild AFRC, Fort George Wright, Camp Seven Mile)		<ul style="list-style-type: none"> Manage historic building and/or archaeological sites 	Recurring
Thurston County RC	530129	<ul style="list-style-type: none"> Conduct an archaeological site file check/survey and SHPO/Tribal consultations prior to construction 	FY16
Walla Walla		<ul style="list-style-type: none"> Manage historic building 	Recurring
Wenatchee (USARC; RC)		<ul style="list-style-type: none"> Manage historic building 	Recurring
Yakima Training Center	530030	<ul style="list-style-type: none"> Coordinate with YTC's CRM and conduct an archaeological site file check/survey and SHPO/Tribal consultations prior to construction of the WAARNG Barracks/Billeting at YTC 	2013
Yakima RC		<ul style="list-style-type: none"> Manage historic building 	Recurring

Guidance for programming projects is provided in **Appendices H** and **I**. Government estimates for these projects are included in **Appendix G**.

2.2.3 Cultural Resources Compliance Actions, FY 2014-2018 Undertakings

In addition to the management actions and site- or training installation-specific projects noted in section 2.2.2, this section outlines Section 106 compliance actions to be completed in support of projects initiated by other directorates within the WAARNG over the next 5 years (see **Table 2-4**), in order of current military construction (MILCON) funding priority. The CRM must develop projects and plans for the identification and protection of cultural resources and compliance actions needed when resources could be affected. Cultural resources compliance actions can include archaeological or historic building surveys, consultation with the SHPO, impacts mitigation, arranging for and agreements with curation facilities, initiation of Tribal consultation related to a specific project, or development of agreement documents for a specific project. These projects might be necessary due to mission changes or master planning initiatives, or might be a part of Integrated Training Area Management (ITAM) projects; natural resource management plans; major maintenance programs; changes in equipment, assets, mission, or training; and consolidating or relocating units.

Table 2-4. Cultural Resources Compliance Actions Planned for FY 2014-2018

MILCON Project	Description of Undertaking	Proposed Compliance Action
530033	Construction of new Camp Murray Entry Control Point/Main Gate (FY12)	An archaeological survey had already been completed in this area in 2004. There is one archaeological site (45P1518) that was removed for the construction. The site was determined not eligible for NRHP listing. Construction completed in FY13.
530132	Construction of Tactical Unmanned Aircraft Systems facility at Yakima Training Center (FY13)	Five archaeological surveys had already been conducted between 1999 and 2002. No further surveys are needed as per consultation with the SHPO.
530015	Construction of Information/Operations Readiness Center at Joint Base Lewis McChord (FY13)	Coordination with JBLM's Cultural Resources Program Manager.
530041	Construction of Billeting/Barracks at Yakima Training Center (FY14)	Coordination with YTC's Cultural Resources Program Manager.
530129	Construction of Thurston County Readiness Center	Archaeological survey of the proposed site and consultation with the SHPO.
530035	Construction of Pierce County Readiness Center	Archaeological survey of the proposed site and consultation with the SHPO.
530077	Construction of Joint Force Headquarters at Camp Murray	An archaeological survey will be completed in the proposed location of this facility prior to PCRC construction.

As noted above, guidance for developing and implementing the projects and protecting resources is included in **Appendix I**. An internal cost estimate for the projects listed in section 2.2.3, for ARNG review only, is provided in **Appendix G**.

2.3 Cultural Landscape Approach

Cultural resources constitute significant elements of the ecosystems in which Army installations and their component activities exist and function. Planning and management of cultural resources should occur within the context of a comprehensive and integrated land, resource, and infrastructure approach that adapts and applies principles of ecosystem management. This involves planning and management of cultural resources by reference to the landscape.

The development and implementation, as appropriate, of a cultural landscape approach to WAARNG installation management is required by AR 200-1. A cultural landscape approach:

1. Analyzes the spatial relationships among all cultural resources within their natural setting. Installation cultural resources management planning occurs through installation ICRMPs, and can be facilitated by installation Geographic Information System (GIS) if available.
2. Serves as an organizing principle to record the landscape in a manner that incorporates the complexity of human cultural interaction with the natural terrain through time. Military installations are treated as an integral entity with interrelationships existing among the natural and cultural resources present. Military operations are treated as one, albeit one of the most significant, of a number of human cultural activities that have influenced the installation cultural landscape. The intent of this approach is to fully integrate cultural resources management with military training, testing and infrastructure operations.

3. Recognizes that cultural resources may be present on installations because of, or may even be a result of, continuous military occupation and use of the land. Landscapes on any Army installation have all been affected to some degree by human activity. Prehistoric and historic archaeological resources, historic buildings, structures and districts, sacred sites, endangered species habitat, wetlands, riparian areas, and other components of the ecosystem have been influenced, maintained, or created by prehistoric and historic human occupants, and modern military use of the land. All of these natural and man-made features, including those related to military operations, are viewed as a series of surface and subsurface features that make up the installation's cultural landscape.
4. The cultural landscapes on military installations are unique because there are no other landscapes in this nation that have evolved from a continued use for defense-related purposes. Therefore, there must be functional continuity, military training and testing and other defense related activities must continue to occur to maintain, and to allow the military cultural landscape to continue to evolve. As a resource category, a "cultural landscape" (see Appendix I) can be determined eligible for inclusion in the NRHP.

The WAARNG cultural resources program has implemented the cultural landscape approach in several ways:

- Use of GIS to create cultural resources data layers that are integrated within the geodatabase for each site and training area; these layers allow planners to view cultural resources as integrated with natural resources and infrastructure elements within the landscape.
- Integration of cultural resources planning efforts with the virtual installation Master Plan
- Integration of the ICRMP with the following plans and programs: Real Property Development Plan, Integrated Training Area Management (ITAM) Plan, conservation management, compliance Management, and National Environmental Protection Act (NEPA) management
- WAARNG's archaeological and historic structures survey reports (2005; 2012) provide guidance which provides planners with site-specific historical context and past land-use patterns.
- Development of creative approaches to cultural resources management that provide training opportunities
- Early review and coordination with G3 staff and CFMO staff on the potential of undertakings to impact cultural resources

2.3.1 GIS

Integrating cultural resource data with the Geographical Information System (GIS) program has allowed the WAARNG cultural resource program to better support the WAARNG mission. WAARNG has developed GIS layers for historic buildings, archaeological sites and potential future cultural resources covering statewide installations. The entirety of the WAARNG GIS geodatabase is Spatial Data Standards for Facilities, Infrastructure, and Environment (SDSFIE) compliant, including the layers designated for use by cultural resources. The GIS program currently warehouses all cultural resource data provided from archaeological and historical building surveys (whether performed in-house or contracted out), providing an easily understood method to manage our increased baseline knowledge. These cultural resource data layers contain the most current information for all WAARNG installations including:

- Archaeological sites—contains all known prehistoric and historic archaeological sites on WAARNG installations with descriptions

- Historical feature points—contains any monuments, memorials, buildings, static displays, etc. located at WAARNG installations.
- Cultural survey points/areas—sites that have been surveyed by archaeological teams in the course of Phase I or II studies
- Terrestrial feature points/areas—contains data that can display individual archaeological site locations as points or the entire planar area that was surveyed.

As a result of this integration, the cultural resources program has been able to operate under a cultural landscape approach. The cultural resources program can easily and effectively communicate with stakeholders during Section 106 proceedings, as well as to installation commanders whenever training may occur too near archaeological sites. Training site managers have access to the database so that decisions can be made about training if the CRM is not immediately available.

The development, organization and maintenance of GIS data layers for the WAARNG are an ongoing process. Data gaps currently exist for integrating the information about historic structures and archaeological sites into a single database where users can point to a structure and obtain all cultural resources information pertaining to that structure. An effort for building this database is underway.

With regard to protecting GIS data, GIS layers depicting archaeological resources and sacred sites are considered sensitive and are not released to the general public (see section 2.5). In accordance with regulation, computers where these layers are stored are password protected. Any documents containing such information are also considered sensitive and are for official use only. All GIS data provided by contractors conforms to AR 200-4, which states “any electronic spatial data produced by inventories shall conform with the Federal Information Processing Standards and spatial data standards for DOD to ensure the spatial data is useable in various spatial data systems.”

2.3.2 Sustainability Initiatives

1. The WAARNG has an agreement with local governments concerning the disposal of armory buildings in Anacortes, Bellingham, Buckley, Centralia, and Spokane. That is, if the city/county government earmarks funds or properties for the WAARNG to construct its facilities on, then if/when the WAARNG decides to construct a new armory (typically the cycle time for armory buildings is 25 years, the minimum amount of time it takes to pay off the bonds needed for construction), the old building will revert to the respective city/county government.
2. The WAARNG has adaptive reuse of divested historic buildings – Some of divested armories such as Camas, Colville, and Okanogan have been put for adaptive reuse by the tribes. Confederated Tribes of Colville has been leasing the Okanogan armory since 2007 for use as a social services center. Everett armory was sold by the State of Washington as surplus property and is now being used by a church organization. Ellensburg armory was turned over to the Kittitas County government and is currently being remodeled by the County to become government offices for the Washington State University-Kittitas County Extension, the County Noxious Weed Control Board, and the County event center/fairgrounds office. After WAARNG’s divestiture, Camas National Guard Armory has been leased by the City to Vancouver Elite Gymnastics Academy.
3. The WAARNG has not previously reused building materials from demolished building, historical or not. Potential exists to develop a deconstruction process that incorporates recycling or reuse of historic building material from the demolition of historic and non-historic structures. In the past, disposal of demolition debris are shouldered by the contractors as part of the contract.

Currently, the WAARNG’s CFMO contracts specifies that the contractor’s deconstruction plan incorporates the recycling or reuse of building materials from demolished structures (historic or not). For example, the agency was credited an unknown amount from the cost of deconstruction

as a result of recycling building materials from the demolished structures in Seattle Pier 91 facility.

2.4 Coordination and Staffing

Cultural resources compliance requirements must be completed prior to implementation of mission-essential programs, projects, and training.

Integration and coordination among WAARNG offices can be very challenging. Installation program managers (including cultural resources, natural resources, training, housing, landscape maintenance) manage multiple programs and it can be difficult to communicate with other offices on a regular basis. To effectively manage a cultural resources program, coordination is absolutely essential. Other offices need to be aware of the cultural resources program's responsibilities. The CRM also must be aware of the activities of other installation offices that could potentially impact cultural resources. Lack of proponents for cultural resources could ultimately result in insufficient funding for the program.

An effective CRM should

1. Understand the military mission.
2. Have or acquire an inventory of archaeological resources with locations and maps. This must be closely controlled and discussed on a case-by-case manner.
3. Have a clear understanding of how their job supports the military mission.
4. Review proposed programs and projects to determine necessary compliance.
5. Align cultural resources compliance with NEPA requirements whenever possible.
6. Work on gaining proponents for cultural resources management up the chain of command.
7. Know what other installation offices are doing, explain cultural resources responsibilities, and discuss potential impacts on cultural resources.
8. Coordinate and consult with outside entities including the SHPO, federally recognized Tribes and Native Hawaiian organizations, and local interest groups, as mandated in the NEPA, NHPA, DoDI 4710.02, AR 200-1, and other laws and regulations summarized in **Appendix H**. Neglecting to consult with these interested parties early in the planning process could result in unnecessary tension, which will cause delays that translate into government time and cost. **Recent legislation (36 CFR 800, NAGPRA) has strengthened responsibilities to consult with federally recognized tribes and Native Hawaiian organizations.**

2.4.1 Internal WAARNG Coordination and Staffing Overview

Coordination and staffing procedures are critical for activities such as construction; long-range planning; building repair, maintenance, or renovation; and planning and execution of mission training or other mission-essential activities. Coordination is also critical for cultural resources stewardship and compliance. Actions that typically trigger internal coordination and compliance include, but are not limited to

- *Building maintenance and repair*
- *Landscape and grounds repair or replacement*
- *New construction – buildings or additions, infrastructure, roads, and trails*
- *Major renovations to buildings*
- *Major changes in use of buildings*

- Major changes in training locations or type
- Master planning
- Divesting of property
- Demolishing building or structures
- Leasing or using private or public property
- Emergency operations
- Compliance with Anti-Terrorism Force Protection requirements.

Chapter 1 introduced the internal stakeholders and review requirements for development of the ICRMP. **Table 2-5** lists internal stakeholders and their responsibilities and involvement in the cultural resources program.

Table 2-5. Internal Stakeholder Coordination

Internal Stakeholder	Interface with Cultural Resource Program and CRM
Leadership – TAG, ATAG, Chief of Staff	<ul style="list-style-type: none"> ▪ Provide leadership support to the cultural resources program. Through review and signing of ICRMP, determines the cultural resources policy and procedures for the WAARNG. ▪ Participate in cultural resources awareness training.
HQ, SMO, CFMO	<ul style="list-style-type: none"> ▪ Have the ICRMP as a component plan within the installation Master Plan and Design Guide. ▪ Provide project and program information to the CRM for review during planning stages. ▪ Include time schedules for cultural resources compliance. ▪ Have the current inventory of cultural resources. ▪ Invite CRM to planning and project meetings. ▪ Have a permitting system established for anyone who plans to dig on the installation. The CRM will review digging plans submitted to them and coordinate these activities with project managers, local tribes and consulting parties. ▪ Provide background information concerning facilities, environmental, and geographic factors, surface disturbance, threatened and endangered species, wetlands, and other sensitive natural resources to the CRM.
USPFO	<ul style="list-style-type: none"> ▪ Should have the ICRMP as a component plan within the installation Master Plan and Design Guide. ▪ Should have the current inventory of cultural resources, and discuss upcoming project with the CRM to ensure timely compliance. ▪ Invite CRM to planning and project meetings. ▪ Participate in cultural resources awareness training.
Master and Strategic Planning	<ul style="list-style-type: none"> ▪ Should have the ICRMP as a component plan within the installation Master Plan and Design Guide. ▪ Should have the CRM review master / strategic plans and training plans. ▪ Should include time schedules for cultural resources compliance and any necessary tribal consultation in implementation of plans and training. ▪ Invite CRM to planning and project meetings.

Internal Stakeholder	Interface with Cultural Resource Program and CRM
	<ul style="list-style-type: none"> ▪ Participate in cultural resources awareness training.
Installation Commander, Armorers	<ul style="list-style-type: none"> ▪ Shall have the current inventory of significant cultural resources found on WAARNG facilities, as well as information on lands that have or have not been surveyed, and should be provided information on any agreement documents pertinent to their facilities and SOPs. ▪ Participate in cultural awareness training.
Facility Managers, Readiness Centers (armories)	<ul style="list-style-type: none"> ▪ Shall have the current inventory of significant cultural resources found on properties, as well as information on lands that have or have not been surveyed, and should be provided information on any agreement documents pertinent to their facilities and SOPs. ▪ Participate in cultural resources awareness training.
Environmental Program Manager	<ul style="list-style-type: none"> ▪ Shall have the current inventory of significant cultural resources found on properties, as well as information on lands that have or have not been surveyed, and should be provided information on any agreement documents pertinent to their facilities and SOPs. ▪ Participate in cultural resources awareness training.
Army Range Control (Army, Joint Base Lewis-McChord, and Yakima Training Center)	<ul style="list-style-type: none"> ▪ Shall have the current inventory of significant cultural resources found on properties, as well as information on lands that have or have not been surveyed, and should be provided information on any agreement documents pertinent to their facilities and SOPs. ▪ Shall provide background information concerning facilities, environmental and geographic factors, surface disturbance, threatened and endangered species, wetlands, and other sensitive natural resources to the CRM. ▪ Participate in cultural resources awareness training.
Unit Commander, Environmental Liaison, Unit Environmental Command Officer	<ul style="list-style-type: none"> ▪ Shall have the current inventory of significant cultural resources found on properties, as well as information on lands that have or have not been surveyed and SOPs. ▪ Participate in cultural resources awareness training.
Environmental Quality Control Committee	<ul style="list-style-type: none"> ▪ Have the ICRMP as a component of quality control and planning. ▪ Have an understanding of cultural resource compliance requirements. ▪ Include time schedules for cultural resources compliance. ▪ Invite CRM to committee meetings. ▪ Have the current inventory of cultural resources. ▪ Participate in cultural resources awareness training.
Museum Manager	<ul style="list-style-type: none"> ▪ Review historic context and provide historic information to CRM and public affairs office, as appropriate.
ITAM Manager	<ul style="list-style-type: none"> ▪ Shall have the current inventory of significant cultural resources found on properties, as well as information on lands that have or have not been surveyed and SOPs. ▪ Participate in cultural resources awareness training.
Public Affairs	<ul style="list-style-type: none"> ▪ Shall act as a liaison between the CRM and the public, facilitate public meetings, and arrange and conduct meetings or information dissemination with the media, as appropriate. ▪ Shall promote National Historic Preservation Week. ▪ Provide news stories to internal newsletters, newspapers (<i>On</i>

Internal Stakeholder	Interface with Cultural Resource Program and CRM
	<i>Guard</i>), ARNG publications, and local media.
Joint Forces	<ul style="list-style-type: none"> ▪ Shall have the current inventory of significant cultural resources found on properties, as well as information on lands that have or have not been surveyed, and should be provided information on any agreement documents pertinent to their facilities and SOPs.
Recruiters	<ul style="list-style-type: none"> ▪ Be aware of cultural resources reservation program and history and promote to recruits.
WA Air National Guard	<ul style="list-style-type: none"> ▪ Coordinate with the WAARNG regarding all decisions that could potentially affect cultural/archaeological resources and the district, specifically Building 118.

Construction or military mission activities can adversely affect cultural resources. Each WAARNG staff member involved with planning, construction, building repair, or maintenance; or management of training or other mission activities should coordinate with the CRM in the planning process. Analysis of effect should be done prior to NEPA implementation or, at the latest, during the scoping phase for the appropriate NEPA document; this analysis can be coordinated with the Section 106 review process to help streamline the process but requires early and constant coordination. Analysis should commence with the submission of a MILCON request for funding (DD Form 1390/91) or initial identification of a need for a project/training exercise. If the action qualifies for a NEPA Categorical Exclusion (CX), be sure that all NHPA requirements have been resolved or these are no historic properties affected by the proposed action. If properties are affected by the project or training exercise, and the effects have not been mitigated through an MOA, then an EA and MOA are required. For more detailed guidance, refer to the ARNG NEPA Handbook or contact ARNG-ARE Cultural Resource Specialists or NEPA Program Managers.

To facilitate integration of planning and analysis of effects between stakeholders, the CRM will

- *Distribute the ICRMP Revision to and solicit input from internal stakeholders*
- *Discuss the compliance actions proposed in response to MILCON and other projects listed in Chapter 2 (and **Appendix H**) and emphasize time requirements to complete these actions in advance of the undertakings*
- *Distribute SOPs to applicable parties (see **Appendix E**)*
- *Distribute list of historic structure and archaeological sensitivity maps*
- *Develop and conduct cultural resource awareness training*
- *Meet, at a minimum, once a year. but preferably once a month, with CFMO and POTO to discuss upcoming projects and plans*
- *Attend the EQCC meetings*
- *Participate in staff meetings, as appropriate.*

The CRM should contact the above personnel to determine if they understand the cultural resources management program, and periodically interface with these individuals on updates and as new WAARNG mission-essential plans and programs are developed. The Key is to establish relationships so that internal stakeholders will notify the CRM of project changes and upcoming projects.

Timing: Coordination should be ongoing. The sooner the CRM is involved in the planning and project process, the more likely the process will continue without interruption and delays. Projects involving tribal consultation and stakeholder involvement should be identified as early as possible.

2.4.2 External Coordination (Agencies and Stakeholders) Overview

Coordination with non-WAARNG entities is required under several federal laws and regulations and AR 200-1. The NHPA, NEPA, and NAGPRA require coordination with interested parties and other government agencies, depending on the action involved.

External agencies and stakeholders that might be involved in cultural resources management include

- *SHPO*
- *THPOs/Tribes*
- *ACHP*
- *Departmental Consulting Archaeologist, National Park Service*
- *Keeper of the National Register, Department of the Interior*
- *Interested members of the public, including ethnographic groups, historic organizations, and others.*

The WAARNG will comply with all pertinent laws and regulations concerning the management and preservation of cultural resources and will, where appropriate, consult with the SHPO, THPO/Tribes, the ACHP, and interested persons, as required:

- *To comply with NHPA Section 106.*
- *To comply with NEPA, when the NHPA Section 106 requirements are integrated into the NEPA process.*
- *In accordance with the NHPA, if the WAARNG and the SHPO come to a disagreement regarding NRHP eligibility recommendations the Keeper of the National Register can be consulted. Guidance on preparing a determination of eligibility can be found at 36 CFR Part 62.3 (d).*
- *In accordance with the NHPA, if the WAARNG and the SHPO come to a disagreement regarding the Section 106 process, the ACHP may assist. The WAARNG must also invite the ACHP to participate in consultations regarding the resolution of adverse effects to historic properties.*
- *In accordance with the NHPA, NAGPRA, ARPA, and NEPA, the CRM shall coordinate with interested Tribes (see **Appendices E and I**).*
- *In accordance with the NHPA, the CRM will consult with the National Park Service for all Section 106 undertakings that have the potential to affect a National Historic Landmark.*

Timing: SHPO and public reviews will generally require a minimum of 30 days for Section 106 reviews of determination of effects. THPO and Tribe reviews require additional diligence. At a minimum, concurrent with the 30-day review, follow up with THPOs/Tribes by sending a certified letter to receive input. A thorough memorandum for record (MFR) of contact with THPOs/Tribes must be kept for these conversations.

2.5 Tribal Consultation Program

On 27 October 1999, the DoD promulgated its annotated American Indian and Alaska Native Policy, which emphasizes the importance of respecting and consulting with tribal governments on a government-to-government basis. The policy requires an assessment, through consultation, of the effect of proposed DoD actions that might have the potential to significantly affect protected American Indian tribal resources, American Indian tribal rights, and American Indian lands before decisions are made by the services. *DoDI 4710.02* provides additional guidance for this policy. If it appears that there might be an effect, the appropriate federally recognized tribes, Alaskan Native villages and corporations, and Native

Hawaiian organizations would be contacted. **Appendix E** provides POC information for Tribes that have known affiliations with lands under WAARNG control.

2.5.1 Status of Consultation

WAARNG initiated the Government to Government consultation with interested Tribes in 2001 during the development of the draft ICRMP. The ICRMP was not finalized and the Native American consultation process was not continued. The WAARNG consulted with interested federally recognized American Indian tribes regarding the development of the ICRMP for 2008–2013 for lands managed by WAARNG, and continues to consult on a case-by-case basis in regard to undertakings affecting specific Tribes or for projects that are of interest to the Tribes. The consultation for the ICRMP was initiated when letters were sent out 10 January 2006 for an invitation for comment on the draft ICRMP 2008-2013.

Native American consultation had been continued as part of the ICRMP update. Tribes with a potential cultural interest in WAARNG facilities were invited to review and provide comments on the updated ICRMP. Letters were sent to the SHPO and federally and non-federally recognized tribes throughout the State of Washington as well as to a Tribe in Oregon with interest in cultural resources in Washington State lands. In that letter, Tribes were provided with maps of all the facilities associated with the WAARNG virtual installation (**Fig. 2-1**) and asked to indicate whether they have any concerns for sacred sites and traditional cultural properties on lands within that installation. Summary of the outcome of the consultations were summarized in Appendix B.

Informal consultation has been conducted through phone calls, email, regular mail, and WA Military Department website (<http://mil.wa.gov/Environmental/Army.shtml>). Through the use of these technologies, the CRM is able to disperse information quickly to all of the tribes, ensuring timely notification for Section 106 obligations, ICRMP/INRMP comments, and any other matters that are of potential interest to them.

2.5.2 Development of the ICRMP and ICRMP Revisions

The WAARNG must consult with affected THPOs and tribal representatives (on a government-to-government basis) in the development of the ICRMP and subsequent ICRMP Revisions. The WAARNG must take into account the views of Tribes in reaching a final decision. At a minimum, WAARNG should send a letter to each affected Tribe to request input into the development of the ICRMP Revision. Unless protocols have been established between the WAARNG and a specific Tribe allowing direct contact between the CRM and THPO or other designated Tribal representative, all correspondence from the WAARNG to a Tribe should be sent from the TAG or Chief of Staff to the Tribal Chair or Chief. Depending on the response received from each Tribe, the WAARNG will provide copies of the draft and final ICRMP or ICRMP Revision to the Tribes for review and comment. Again, a cover letter from the TAG or Chief of Staff addressed to the Tribal Chair or Chief should be included with all such review requests.

2.5.3 Ongoing CRM Responsibilities

CRMs should maintain a file or binder containing the following information relating to the WAARNG's consultation program to date. The file should include

- *A state map with tribal lands overlain*
- *Summary of past consultation activities (meetings)*
- *Letters and memorandums for record*
- *Planned future consultation*
- *Point of contact list*
- *Any agreement documents.*



Figure 2-1. Tribal areas of interest in Washington state.

The file should be updated as necessary to include MFRs, meeting agendas and summaries, updated POC lists, and agreement documents.

*The POC list in the file and in the ICRMP (**Appendix E**) should be updated whenever new information becomes available. At a minimum, the list should be checked annually. Updates can be entered into the POC table of the ICRMP database, and a report printed for inclusion in the appendix. The CRM can call/access the following resources for update information:*

- SHPO
- THPOs
- Bureau of Indian Affairs Web page
- Other federal or state agencies, including the state department of transportation.

2.6 Curation

Currently, WAARNG does not have any archaeological items in possession. The 2005 archaeological inventory conducted at Camp Murray and Camp Seven Mile did not include collection of artifacts. If future inventories are conducted on a WAARNG installation, it is recommended that the WAARNG have an agreement in place for curation prior to conducting any archaeological inventories that would include collection of artifacts.

During the 2007 ICRMP preparation, the Quileute Tribe suggested developing an MOA (or at least a programmatic draft of one in concert with tribes) in advance of future inventories at WAARNG installations. More specifically, the CTUIR requested that if a future archaeological inventory takes place at the Walla Walla Readiness Center, consultation with the Cultural Resources Protection Program (CRPP) of the CTUIR is requested prior to collection of any artifacts.

In the event that materials or artifacts would be collected as a result of future archaeological investigations or construction activities on WAARNG installations, these objects would be curated at in accordance with 36 CFR Part 79 (see section 4.2.6 of 2008-2013 ICRMP for curation installation requirements.) Facilities that meet these requirements in the state of Washington can be accessed online and are listed below:

- Adam East Museum Art Center, 509.766.9395
<http://www.owt.com/moseslake/museum.html>
- Burke Museum of Natural History, 206.543.7907
<http://www.washington.edu/burkemuseum>
- Wanapum Dam Heritage Center, 509.754.3541
<http://www.gcpud.org/culturalresources/wanapum.htm>
- Hibolb Cultural Center, 360.716.2600
<http://www.hibulbculturalcenter.org/>
- Muckleshoot Preservation Department
<http://www.muckleshoot.nsn.us/services/culture--wildlife/culture-program.aspx>

Requirements for curating items at these facilities are included in **Appendix H**.

In general, artifacts from archaeological contexts recovered from WAARNG lands are treated as federal or state property, depending on land ownership and whether federal funding was involved for the investigation that recovered the artifacts. Where human remains and grave associated artifacts are

involved, however, CRMs must follow the procedures outlined in NAGPRA to repatriate such remains and objects to the appropriate Tribes or living descendants, if they can be identified.

In contrast, records, memorabilia, recent or historic artifacts (e.g., tanks, guns, cannon, other weaponry), and donated private collections that are associated with the WAARNG's military history are stored at:

The Washington National Guard Museum
Bldg. #2, Camp Murray WA 98430-5056
Phone: 253-512-7834
Website: <http://museum.washingtonguard.org>

In FY12, the WAARNG's Environmental Programs entered into a MOA with the University of Washington to conduct an assessment of the collections/records/materials that have been stored at Camp Murray's Museum that has been managed by the Washington National Guard State Historical Society staff. Preliminary results showed that there is a lot of moving image materials, oversized photographs depicting WAARNG history, slides, and prints/negatives that need preservation. The next phase of the project is to perform the actual curation/preservation of these collections. The project also includes an assessment of whether the UW's archival ToolKit may be useful in archiving and managing WAARNG's collections.

In general, items relating to the WAARNG's military history are the responsibility of the WAARNG's historian or History Detachment rather than the CRM. National Guard Regulation (NGR) 870-20 "Army National Guard Museums, Museum Activities, and Historical Property" and its associated regulation AR 870-20 "Military History: Responsibilities, Policies, and Procedures" outline the policies applied to these types of items. AR 870-20 and NGR 870-20 can be found online at:

http://www.army.mil/usapa/epubs/CMH_1.html (AR 870-20)

http://www.ARNdpdc.ARNarmy.mil/pubs/870/ngr870_20.pdf (NGR 870-20)

Under NGR 870-20, a historical collection is defined as:

- (1) A collection of artifacts displayed in a regimental room, trophy room, armory, visitor's center, exhibit area or other type of display, not recognized by the U.S. Center for Military History as a museum or museum activity.
- (2) A collection of historical artifacts (including archaeological artifacts) secured, preserved, accounted for, and stored on an installation.
- (3) A collection of historical artifacts in an officers' club, non-commissioned officers club, chapel, lobby, headquarters building, or armory.
- (4) A collection of artifacts such as tanks, artillery, vehicles, aircraft or other items that are displayed in front of buildings (including armories), on a parade ground, at an airfield, in parks, or at other locations around the State.

NGR 870-20 also specifies the roles of CRMs and historians in regards to collections:

The State/installation Environmental Program Manager will advise the museum director/curator regarding archaeological artifacts and other items relating to Native Americans. IAW provisions of AR 200-1, the Environmental Program Manager, in turn, will consult with the installation's Cultural Resources Manager and the Coordinator of Native American Affairs on the applicability of cultural resources laws and regulations.

NGR 870-20 also provides the following guidance regarding archaeological collections:

Archaeological remains or artifacts related to Native Americans will not be accepted into Federal collections without prior approval of the Army National Guard Environmental Program Manager, after consultation with the State/installation Cultural Resources Manager and Coordinator of Native American Affairs. Acceptance of archaeological

material may be subject to additional Federal laws and regulations, and the Environmental Program Manager will advise the museum director/curator regarding any specific cultural resources requirements. Such requirements include, but are not limited to, the National Historic Preservation Act (16 U.S.C. 470a-w) and the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001 et seq.)

2.7 Information Restrictions

Section 304 of the NHPA [16 U.S.C. 470w-3(a) — Confidentiality of the location of sensitive historic resources] states that

- “(a) The head of a Federal agency or other public official receiving grant assistance pursuant to this Act, after consultation with the Secretary, shall withhold from disclosure to the public, information about the location, character, or ownership of a historic resource if the Secretary and the agency determine that disclosure may —
- (1) cause a significant invasion of privacy;
 - (2) risk harm to the historic resources; or
 - (3) impede the use of a traditional religious site by practitioners.”

On federal property, ARPA also provides provisions for restriction of information on archaeological site locations. Tribes have an interest in restricting this information and are not expected to divulge such location information unless they can be reassured of restrictions for access. Therefore, it is extremely important that persons using this document and other cultural resources reports and maps understand that access to all archaeological resource descriptions and locations is restricted to the CRM for internal use only. For this reason, no maps delineating the locations of archaeological resources are included in this ICRMP, nor will any be released to the public.

As a state agency, Washington Military Department’s records, including any cultural resource records associated with the facilities and training installations of the Washington Army National Guard (WAARNG), are covered by the Public Records Act (RCW 42.56). However, specific components of the records including records, maps, and other information identifying the location of archaeological sites are exempt from disclosure (RCW 42.56.300) to avoid looting or depredation of cultural resources.

The WAARNG limits the release of ICRMP and other cultural resources reports, surveys, maps to WMD staff and contractors working on cultural resources projects and master plans. The WAARNG GIS program uses an SDS-compliant geodatabase to protect and store cultural resource information. This geodatabase system is firewalled and accessed only by authorized WAARNG GIS personnel. GIS layers containing archaeological data (such as site locations and descriptions) are for official use only and maintained by three Information Technology staff of the Washington Military Department. The WAARNG does not currently maintain information on Native American sacred sites and traditional cultural properties (TCPs); however, if/when such information does come into WAARNG’s possession, it will be protected to these same standards.

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3. Standard Operating Procedures

The SOPs provided in this ICRMP Revision have been streamlined for use by WAARNG non-environmental personnel. Accordingly, they provide basic guidance for the most common situations that have the potential to impact cultural resources. The SOPs should be one of several tools distributed to WAARNG personnel to help them identify those actions that can impact cultural resources, demonstrate the consequences of conducting actions without appropriate review by the CRM, and highlight the appropriate process for coordination. Guidance for the CRM is provided throughout this ICRMP Revision, particularly in Appendix I.

SOPs should be made available to all personnel including any tenants, contractors, and occasional users. Include an overview in the orientation packet for tenants and occasional users, and include appropriate SOPs in contracts. SOPs can also be featured on the facility web site. Flow charts and procedures for inadvertent discovery can also be included in Trainers' Guides and Soldiers' Cards.

Cultural Resources Manager. AR 200-1 requires the designation of a CRM to coordinate the virtual installation's cultural resources management program. The CRM is, therefore, responsible for the oversight of activities that might affect cultural resources on WAARNG land, or WAARNG activities that might have an effect on cultural resources on non-WAARNG lands. CRMs should be provided with adequate training to ensure that they have a full understanding of their position duties and can provide adequate guidance on compliance with cultural laws and regulations to other stakeholders.

Annual Cultural Resources Training. To enhance integration of cultural resources issues into the planning process and to improve the manner in which cultural resources supports the WAARNG mission, the CRM should provide access to awareness training for training site managers, field commanders and their troops, maintenance staff, and others who may encounter cultural resources. Training subjects can include understanding SOPs, introduction to cultural resources regulations and management, and identification of cultural resources. Training for non-environmental personnel is crucial to ensure a successful cultural resources management program, compliance with environmental laws and policies, and protection of cultural resources.

Timing of SOPs:

SOP	Timing
SOP No. 1: Maintenance and Repair Activities	For exempt actions, no additional time is required. For nonexempt actions, anticipate a minimum of 4 months.
SOP No. 2: Disposal or Demolition of Excess Property	Anticipate a minimum of 4 to 6 months for historic structures.
SOP No. 3: Mission Training of Military and Tenant Personnel	Clearing lands for training requires approximately 4 to 6 months for archaeological surveys. Personnel should be familiar with the contents of SOP 5; can be done as part of annual training and unit in-briefings.
SOP No. 4: Emergency Actions	A minimum of 7 days.
SOP No. 5: Inadvertent Discovery	Personnel should be familiar with the contents of the SOP; can be done as part of annual training and unit in-briefings. Inadvertent discoveries will take a minimum of 30 days.
SOP No 6: Tribal Consultation	Ongoing consultation is required to ensure the success of the WAARNG mission.

STANDARD OPERATING PROCEDURE NO. 1
for
Maintenance and Repair Activities

[Note: If the WAARNG has a valid PA with the SHPO, the terms of the PA supersede this SOP. Also note that these should be stand-alone documents to be distributed to stakeholders without the ICRMP; accordingly, all acronyms should be spelled out in each SOP]

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Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to maintenance and repair activities on WAARNG properties. It is intended for all personnel other than the Cultural Resources Manager (CRM). Examples of applicable personnel are:

- *Leadership*
- *Facilities Maintenance Office, Directorate of Public Works*
- *U.S. Property and Fiscal Officer (USPFO)*
- *Master and strategic planning*
- *Reservation maintenance*
- *Facility managers and armorers*
- *Range control*
- *Environmental Quality Control Committee (EQCC)*
- *Personnel assigned to historic facilities.*

All personnel above are referred to as “manager.”

These procedures are intended to ensure that no disturbance or destruction of significant architectural resources (or their character-defining features) and archaeological resources take place.

Affected Site or Training Installation(s): WAARNG’s Historic Structures Statewide

Statutory Reference(s) and Guidance:

- *National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)*
- *Secretary of the Interior’s Standards and Guidelines for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings*
- *Secretary of the Interior’s Standards and Guidelines for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes*
- *National Park Service Preservation Briefs*
- *DoD Minimum Antiterrorism Standards for Buildings (Unified Facilities Code [UFC] 04-010-01)*
- *Programmatic Memorandum of Agreement for the Demolition of World War II Temporary Buildings, 07 June 1986*

- *Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management*
- *AR Engineering Technical Letter 1110-3-491 – Sustainable Design for Military Facilities (2001)*
- *American Disability Act Accessibility Guidelines for Buildings and Facilities as amended in 2002.*

Applicability:

Typical actions that trigger this SOP:

- *Building maintenance and repair (Form 420R, Form 1391, or work order)*
- *Landscape and grounds replacement*
- *Clearing and grubbing*
- *Road clearing and repair*
- *Trail clearing.*

Specific events that trigger this SOP:

- *Window, roof, and siding repair or replacement*
- *Interior modifications and/or renovations*
- *Exterior modifications and/or renovations*
- *Clearing and vegetation replacement*
- *Road, trail, and curb repair or replacement.*

Coordination (see Figure 3-1):

- *Consult the CRM to determine if the building, structure, or landscape element affected by proposed maintenance activity or use is either a historic property, or has not been evaluated for National Register eligibility.*
- *The CRM will determine whether the proposed activity has the potential to impact cultural resources. If so, it is the CRM's responsibility to activate the NHPA Section 110/106 process and coordinate with the State Historic Preservation Office (SHPO) or other stakeholders.*
- *The CRM will advise the Manager of any project modifications of treatment plans or appropriate treatments that have been defined in consultation with the SHPO and other stakeholders.*

When the proposed activity involves ground-disturbing activities, proponents must

- *Check with the CRM to determine if the activity location has been previously surveyed for archaeological resources.*
- *The CRM will advise on clearances or needed surveys. No ground-disturbing activity may occur until authorized by the CRM.*
- *Refer to SOP 4 for inadvertent discoveries during ground-disturbing activities.*

**STANDARD OPERATING PROCEDURE 1
Maintenance and Repair Activities**

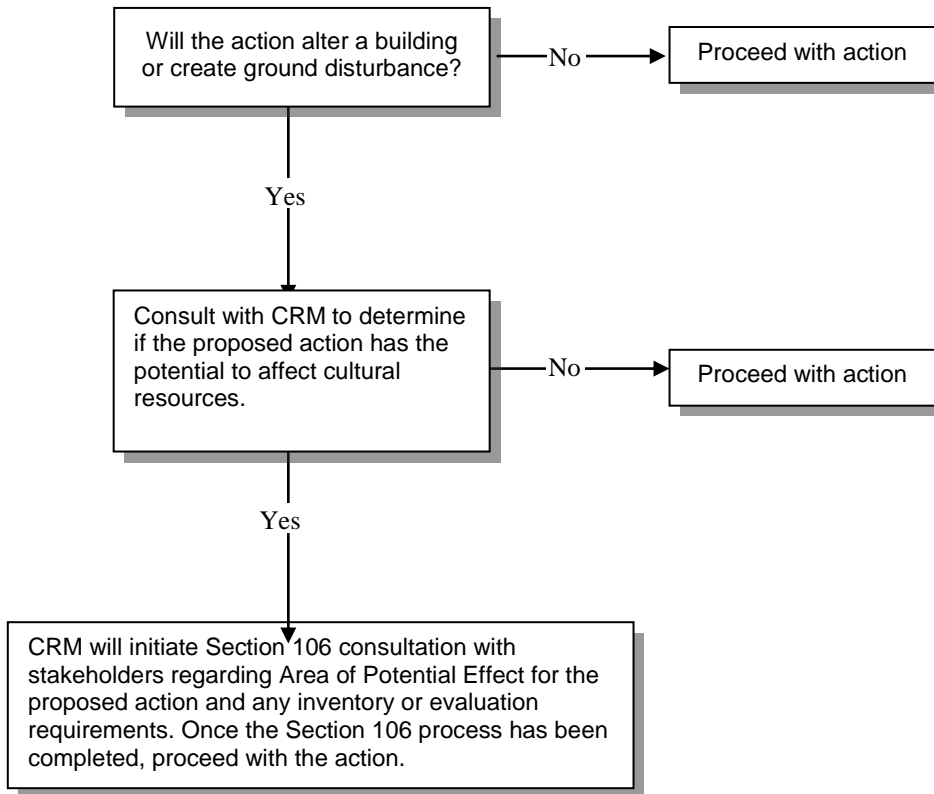


Figure 3-1. Flow Chart for Maintenance and Repair Activities

STANDARD OPERATING PROCEDURE NO. 2
for
Disposal or Demolition of Excess Property

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Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to disposal or demolition of federally owned or controlled property that is eligible for listing on the National Register of Historic Places or that needs further evaluation to determine eligibility. It is intended for all personnel. Examples of applicable personnel are

- *Leadership*
- *Facilities Maintenance Office, Directorate of Public Works*
- *U.S. Properties and Fiscal Officer (USPFO)*
- *Master and strategic planning*
- *Reservation maintenance*
- *Facility managers and armorers*
- *Range control*
- *Environmental Quality Control Committee (EQCC)*
- *Personnel assigned to historic facilities.*

Affected Site(s) or Training installation(s): WAARNG's Historic Structures Statewide

- **Statutory Reference(s) and Guidance:**
- *National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)*
- *Programmatic Memorandum of Agreement for the Demolition of World War II Temporary Buildings, 07 June 1986*
- *Executive Order 13327 – Federal Real Property Asset Management.*
- *Program Comment: DoD World War II- and Cold War-Era Ammunition Storage Facilities*
- *Program Comment: DoD Cold War-Era Unaccompanied Personnel Housing*

Typical situations: Building or structure demolition or replacement.

Typical triggering event: Mission requirement change causing the removal or replacement of historic buildings and structures (see **Figure 3-2**).

Procedures: If mission requirements cause the demolition or excess of a building or structure that is either eligible for listing on the National Register of Historic Places or that has not been evaluated for eligibility, the project proponent should contact the Cultural Resources Manager (CRM) to initiate the Section 106 process. The CRM will request information on alternatives to the demolition or disposal action such as the potential for using the building for another mission purpose (including potential renovation or rehabilitation), or the potential to relocate or lease the building.

If mission requirements cause the demolition and replacement of historic buildings or structures onsite, the replacement design should be compatible with other buildings in the same area. Changes to the landscape should convey the historic pattern of land use, topography, transportation patterns, and spatial relationships.

An Economic Analysis should be conducted prior to making a decision to demolish or excess a historic building and replace it with new construction. Often, rehabilitation or renovation can be more cost-effective. Consult the CRM for guidance. The CRM will also need to initiate compliance with federal regulations.

Compliance procedures can require a minimum of 4 to 6 months to complete.

**STANDARD OPERATING PROCEDURE 2
Disposal or Demolition of Excess Property**

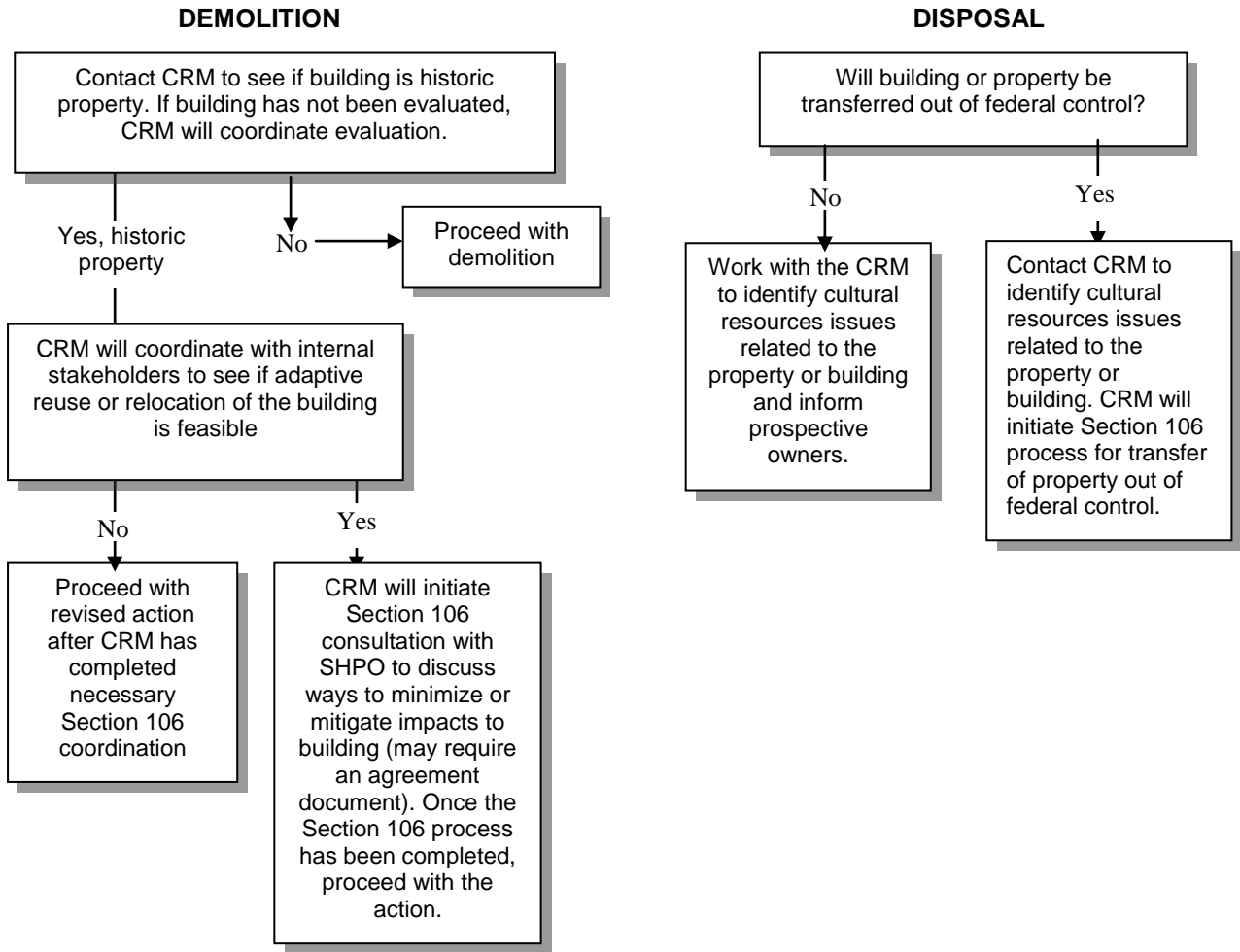


Figure 3-2. Flow Chart for Disposal or Demolition of Excess Property

STANDARD OPERATING PROCEDURE NO. 3
for
Mission Training of Military and Tenant Personnel

Contact:

1. For actions on Joint Base Lewis-McChord Lands contact: JBLM Cultural Resources Manager (CRM) and Coordinator for Native American Affairs, 253.477-3891
2. For actions on Yakima training center, Contact: YTC CRM, 509.577.3535, evening and weekend contact: 509.577.3236
3. For actions on WAARNG Land, Contact: Camp Murray CRM, office: 253.512.8704 or 253-512-8717

Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to conducting mission training exercises on WAARNG and non-WAARNG property. It is intended for all personnel. Examples of applicable personnel are

- *Plans, Operations, and Training Officer (POTO)*
- *Reservation maintenance*
- *Environmental program manager (M-Day)*
- *Range control*
- *Unit commander and environmental liaison*
- *Integrated Training Area Management (ITAM)*
- *Environmental unit command officer*
- *Public affairs*
- *Joint forces*
- *Unit / activity personnel.*

Nonmilitary units or tenants using WAARNG lands will also be instructed on responding to inadvertent discovery situations (see SOP No. 5).

Statutory Reference(s):

- *Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulations (43 CFR 10)*
- *Archaeological Resources Protection Act (ARPA)*
- *National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)*
- *National Environmental Policy Act (NEPA) (on federal and tribal lands).*

Applicability:

Typical actions that could trigger these requirements:

- *Outside field training exercises on WAARNG and non-WAARNG property.*

Specific events that could trigger these requirements:

- *Planning, scheduling, and implementation of field training exercises*

- *Expansions of training areas*
- *Major changes in types and locations of training exercises.*

Affected Site(s) or Training Installation(s): All WAARNG installations (state and federal), Army property, and public/private property.

Actions: This section describes specific actions to be taken before and during training to protect cultural resources (see **Figure 3-3**):

Planning Operations and Training Office (POTO), Reservation Maintenance, Unit Commanders and Environmental Liaison, Environmental Unit Command Officer – planning and scheduling of training

- *When planning field training, contact the CRM at least 4 months in advance for archaeological clearances. If planning will involve expansions at training areas or major changes in types and locations of training exercises, a longer period will be required for review and coordination.*
- *Check with CRM to determine archaeological sensitivity of training areas. If possible, avoid areas of high sensitivity.*
- *Coordinate with CRM for archaeological clearances for mission-essential areas.*

Range Control: At the initiation of and during training of a WAARNG training installation

- *Ensure units using the site(s) or training installation(s) have been provided with proper information on protection of cultural resources including SOP 4 on inadvertent discovery and maps illustrating closed areas prior to conducting mission training*
- *Monitor compliance with SOPs and closures by units training at the site(s) or training installation(s)*
- *Report violations of closures and SOPs to the CRM*
- *Provide feedback to CRM on effectiveness of orientation materials.*

Unit Commander

- *Ensure field troops understand applicable cultural resources policies and SOPs*
- *Direct questions clarifying cultural resources policies and procedures to the CRM*
- *Ensure training does not occur in areas that are closed and training restrictions are observed*
- *Report violations of policies, SOPs, and closures to training installation manager*
- *Provide feedback to CRM on effectiveness of orientation materials.*

Field Troops/Tenants

- *Review cultural resources information regarding the proposed training area prior to conducting training exercises*
- *Follow applicable SOPs for the training area*
- *Comply with all closures of locations within training areas and any restrictions on training activities in locations of resource sensitivity*
- *Report any discoveries to unit commander.*

STANDARD OPERATING PROCEDURE 3
Mission Training of Military and Tenant Personnel

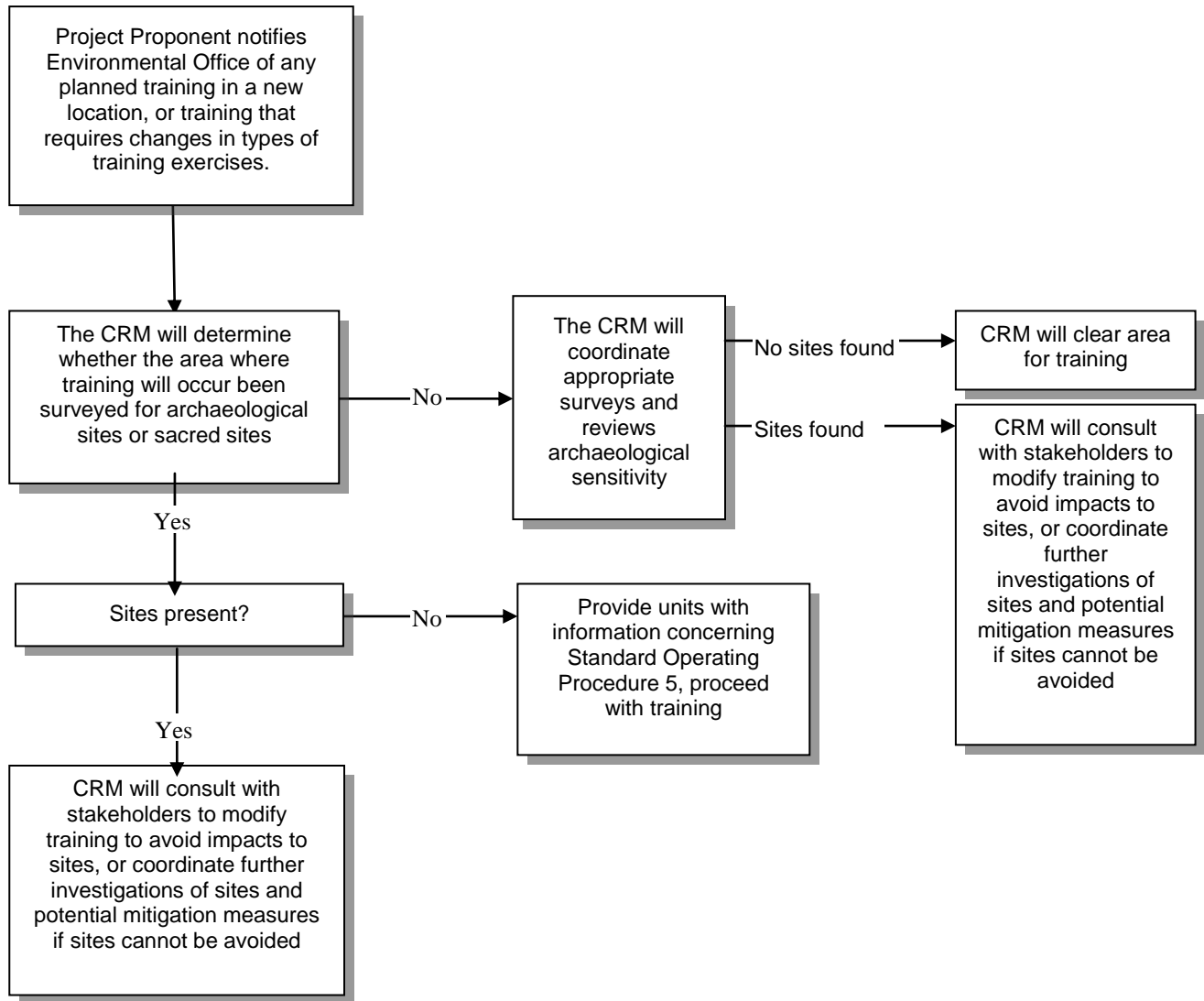


Figure 3-3. Flow Chart for Mission Training of Military and Tenant Personnel

STANDARD OPERATING PROCEDURE NO. 4
for
Emergency Operations

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Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken prior to conducting emergency operations on WAARNG and non-WAARNG property. It is intended for all personnel. Examples of applicable personnel are

- *Plans, Operations, and Training Officer (POTO)*
- *Reservation maintenance*
- *Environmental program manager (M-Day)*
- *Range control*
- *Unit commander and environmental liaison*
- *Integrated Training Area Management (ITAM)*
- *Environmental unit command officer*
- *Public affairs*
- *Joint forces*
- *Unit / activity personnel*

Non-military units or tenants using WAARNG facilities will also be instructed on responding to inadvertent discovery situations (see SOP No. 5).

Policy: Responses to emergencies and all planning for emergency response actions at WAARNG site(s) and training installation(s) will be carried out in accordance with the statutory applications contained in

- *Native American Graves Protection and Repatriation Act (NAGPRA), Archaeological Resources Protection Act (ARPA), and National Historic Preservation Act (NHPA), and their respective implementing regulations (36 CFR 800; 43 CFR 10) on federal lands*
- *National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800) for federally supported actions on nonfederal public lands and private lands*
- *National Environmental Policy Act (NEPA) for federally supported actions that require it.*

It should be noted that immediate rescue and salvage operations conducted to preserve life or property are exempt from the provisions of Section 106 (36 CFR 800.12[d]). However, once the emergency response action has been completed, the CRM is responsible for completing any further Section 106 coordination to mitigate any impacts to cultural resources resulting from the action.

Procedure (Figure 3-4): All reasonable efforts are made to avoid or minimize disturbance of significant cultural resources during emergency operations. Planners will communicate with applicable CRM regarding potential effects on significant cultural resources that might occur in association with such activities.

Upon notification of a proposed emergency operation, the CRM will notify and consult with the appropriate agencies and parties, regarding the known or likely presence of cultural resources in the area of the proposed operation. The agencies and parties are expected to reply in 7 days or less. Notification may be verbal, followed by written communication. This applies only to undertakings that will be implemented within 30 days after the need for disaster relief or emergency action has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability prior to expiration of the 30 days. The CRM will ensure that all WAARNG personnel and units involved in the project are briefed regarding the protocol to be followed in the case of the inadvertent discovery of cultural resources during emergency operations (SOP No. 5).

**STANDARD OPERATING PROCEDURE 4
Emergency Operations**

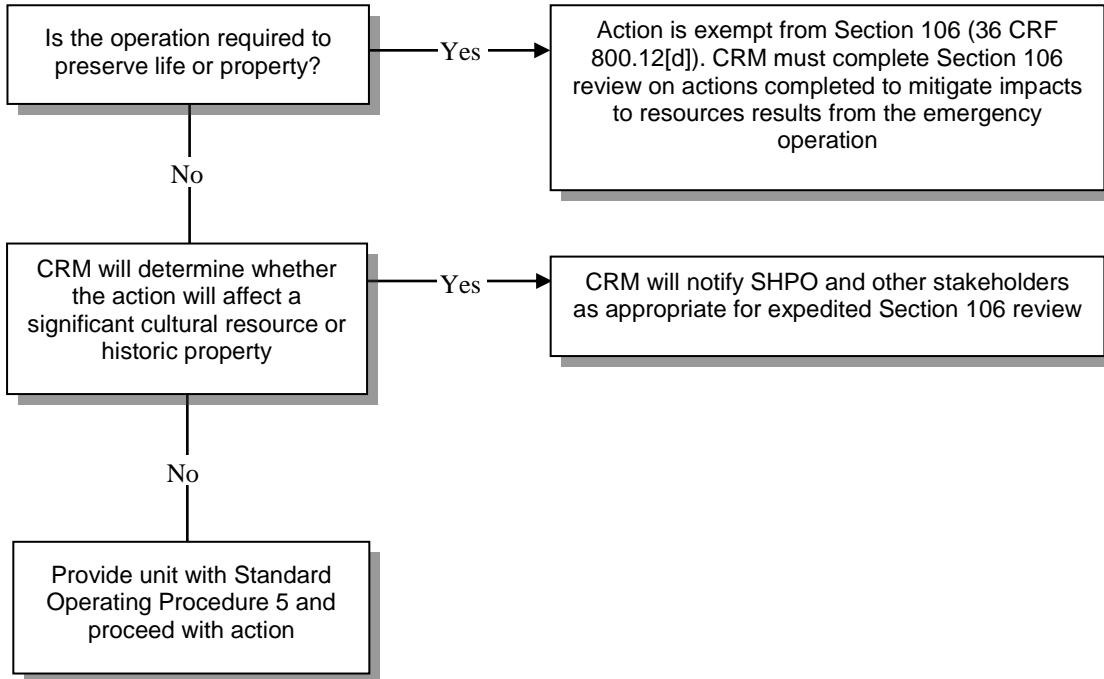


Figure 3-4. Flow Chart for Emergency Operations

STANDARD OPERATING PROCEDURE NO. 5
for
Inadvertent Discovery of Cultural Materials

Contact:

1. For actions on Joint Base Lewis-McChord Lands contact: JBLM Cultural Resources Manager (CRM) and Coordinator for Native American Affairs, 253.477-3891
2. For actions on Yakima training center, Contact: YTC CRM, 509.577.3535, evening and weekend contact: 509.577.3236
3. For actions on WAARNG Land, Contact: Rowena Valencia-Gica, Ph.D., Camp Murray CRM, office: 253.512.8704 or 253-512-8717

Scope: This Standard Operating Procedure (SOP) outlines the steps to be taken upon inadvertent discovery of cultural resources. It is intended for all personnel. Examples of applicable personnel are

- *Plans, Operations, and Training Officer (POTO)*
- *Reservation maintenance*
- *Environmental program manager (M-Day)*
- *Range control*
- *Unit commander and environmental liaison*
- *Integrated Training Area Management (ITAM)*
- *Environmental unit command officer*
- *Public affairs*
- *Joint forces*
- *Unit/activity personnel and tenants.*

Statutory Reference(s):

- *Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulation (43 CFR 10)*
- *Archaeological Resources Protection Act (ARPA)*
- *National Historic Preservation Act (NHPA) and its implementing regulation (36 CFR 800).*

Applicability:

Typical actions that trigger this SOP:

- *Field training exercises*
- *Construction and maintenance*
- *Activities such as digging, bulldozing, clearing or grubbing*
- *Off-road traffic*
- *General observations (i.e., eroded areas, gullies, trails).*

Discovery of the following will trigger this SOP:

- *Discovery of known or likely human remains*
- *Unmarked graves*
- *Indian or historical artifacts*
- *Archaeological features*
- *Paleontological remains.*

Actions: This section describes specific actions to be taken for inadvertent discovery. The flowchart is intended to be used by unit/activity level personnel, unit commanders, and similar personnel, as a decision-making guide when inadvertent discoveries are made as described under the applicability section of this SOP (**Figure 3-5**).

Unit personnel, contractor, field crews, other tenants

- *Cease ground-disturbing activity when possible historical artifacts and features, human remains, or burials are observed or encountered*
- *Report any observations or discoveries of historical artifacts and features, human remains, burials, or features immediately to the unit commander or facility manager*
- *Secure the discovery location(s).*

Unit Commander or Training Installation Manager

- *Immediately notify Range Control.*
- *Await further instructions from the range control officer.*
- *Examine the location of the discovery to ensure that it has been properly secured. Take appropriate measures to further secure location if needed.*
- *Coordinate with range control officer on where activities can resume.*
- *Give direction to the field troops, construction crew, or non-ARNG user regarding locations where training exercises or activity may continue.*

Range Control Officer

- *Examine the location of the discovery to ensure that it has been properly secured. Take appropriate measures to further secure location (from vandalism and weather) if needed.*
- *Give direction to the unit commander, construction crew, or non-ARNG user regarding locations where training exercises or activity may continue.*
- *Immediately notify the CRM.*
- *If human remains are known or suspected to be present, also promptly notify the state police.*

Activity may not resume in area of discovery until cleared by the CRM. Anticipate a minimum of 30 days.

Cultural Resources Manager

The CRM has a number of specific procedures to follow in the event of an inadvertent discovery, with procedures varying dependent on whether the discovery occurs on federal, state, or privately owned land, and whether human remains or funerary items are discovered. Guidance for this topic is included in Appendix I of the Integrated Cultural Resources Management Plan.

**STANDARD OPERATING PROCEDURE 5
Inadvertent Discovery of Potential Cultural Resource**

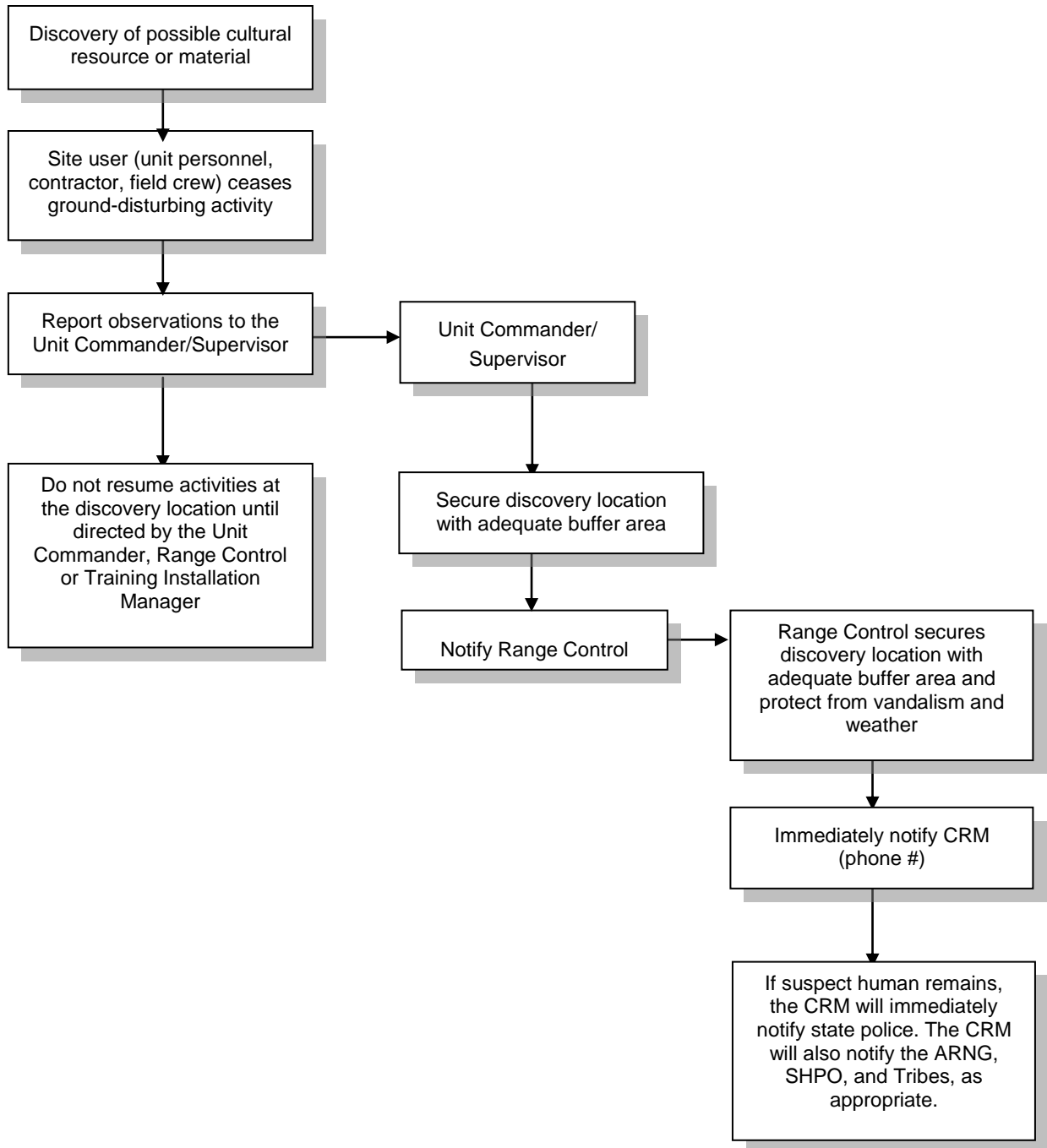


Figure 3-5. Flow Chart for the Inadvertent Discovery of Potential Cultural Resource

STANDARD OPERATING PROCEDURE No. 6
For
Native American Consultation

Contact:

1. For actions on Joint Base Lewis-McChord Lands contact: JBLM Cultural Resources Manager (CRM) and Coordinator for Native American Affairs, 253.477-3891
2. For actions on Yakima training center, Contact: YTC CRM, 509.577.3535, evening and weekend contact: 509.577.3236
3. For actions on WAARNG Land, Contact: Camp Murray CRM, office: 253.512.8704 or 253-512-8717

Scope: Federal law requires consultation with affected Native American tribes, Native Hawaiian organizations, Native American religious leaders and representatives, lineal descendants of affected Native American tribes, and the interested public. See **Appendix H** for more information on legal and regulatory standards. Consultation is a meaningful and respectful dialog between two individuals or groups in which one has expertise, knowledge, or experience that can inform a decision. It must be noted that consultation is not merely notification or the obtaining of consent.

This Standard Operating Procedure (SOP) outlines the steps to be taken upon inadvertent discovery of cultural resources. It is intended for all personnel. Examples of applicable personnel are

- *Leadership*
- *Facilities Maintenance Office, Directorate of Public Works*
- *U.S. Properties and Fiscal Officer (USPFO)*
- *Master and strategic planning*
- *Reservation maintenance*
- *Facility managers and armorers*
- *Range control*
- *Environmental Quality Control Committee (EQCC)*
- *Public affairs*
- *Joint forces*
- *Unit/activity personnel and tenants.*

Statutory Applications:

- *National Historic Preservation Act (NHPA) and its implementing regulations (36 CFR 800)*
- *Native American Graves Protection and Repatriation Act (NAGPRA) and its implementing regulations (43 CFR 10)*
- *Archaeological Resources Protection Act (ARPA)*
- *Army Regulation (AR) 200-1*
- *Presidential Memorandum for Heads of Executive Departments and Agencies, dated 29 April 1994: Government-To-Government Relations With Native American Tribal Governments*
- *Department of Defense Instruction 4710.02: DoD Interactions with Federally-Recognized Tribes.*

Affected Sites or Training Installations: WAARNG virtual installation

Typical triggering events: Issuance of ARPA permit, historic preservation and section 106 activities, matters that significantly or uniquely affect tribal communities or other interested parties, access, use, and protection of ethnographic sites.

Policy

- *The WAARNG TAG shall consult with Native American tribes and other interested parties in the development and implementation of WAARNG cultural resources management plans. The WAARNG tag may enter into contracts with said groups for the purpose of facilitating consultation obligations and assessment services.*
- *The WAARNG, in consultation with Native American tribes and other interested parties, shall establish procedures for consultation.*
- *The WAARNG shall consult with Native American tribes and other interested parties in the development of the WAARNG's cultural resource management plans and have the opportunity for input at all phases of plan development, including suggested levels and locations for surveys.*

Government-to-Government Consultation

The WAARNG will designate and recognize specific points of contact for purposes of carrying out any communication and consultation with federally recognized Native American tribes necessary for implementation of the principles and processes affecting traditional cultural properties; properties of traditional, religious, and cultural importance; sacred sites; human remains; or associated cultural items.

1. The points of contact shall refer matters arising under this SOP to higher WAARNG authority as the occasion or protocol demands.
2. Should the WAARNG point of contact change, the WAARNG will contact the SHPO/THPO regarding the appointment of a new point of contact.
3. The point of contact will review this SOP on an annual basis.

General Consultation Procedures

1. The CRM will work with National Guard Bureau and the Department of Defense (DoD) Tribal Liaison Office to identify federally recognized Native American tribes, Alaskan Native or Hawaiian Native organizations with ancestral affiliations to WAARNG lands.
2. The TAG should invite a representative of the tribal governing body(s), or interested party(s) who may inform decisions from each tribe or organization, to be a consulting party. (Tribes whose traditional land could be affected must be notified.)
3. Consultation should address potential effects of proposed activity on properties of traditional, religious, or cultural significance to each tribe or organization.
4. Terms, conditions, and mitigation determined through consultation shall be incorporated into planning and permitting.
5. The WAARNG will provide an annual report to the involved Native American tribes and other interested parties, complete with site locations and all other pertinent information including dispositions, treatment, and curation. The report will be developed from the present and ongoing survey(s) conducted by current or future contractors.

6. The Native American tribes and other interested parties will make good faith efforts to respond within 30 days or less, when feasible, to requests for information, consultation, or concurrence in relation to issues of traditional cultural properties, sacred sites, burials, or human remains.
7. The WAARNG will limit access to site and resource area information to the greatest extent allowed by law.
8. All pertinent interested parties will be included as signatories on all agreement documents for undertakings affecting properties of traditional, religious, and cultural importance; sacred sites; human remains; and associated cultural items.

National Register of Historic Places nominations and eligibility (regarding sacred sites)

1. The only person delegated statutory authority to sign National Register of Historic Places nominations is the Deputy Assistant Secretary of the Army. Native American tribes and other interested parties do, however, reserve the right, as expressed in the NHPA and sections 60.11 and 60.12 of 36 CFR 60, to concur or not to concur in preparation of recommendations for nomination to the NRHP (in consultation with the WAARNG) when such is related to, or regards, those elements which are traditional cultural properties, sacred sites, or of traditional cultural value to the parties. Native American tribes and other interested parties have the right of appeal as referenced in 36 CFR 60.
2. Both the WAARNG and the State Historic Preservation Office (SHPO)/Tribal Historic Preservation Officer (THPO) must agree on nominations to the NRHP regarding traditional cultural properties and sacred sites.
3. *EO 13007* expresses, in general, the parameters of sacred sites and general accommodations that must be made for their access, use, and protection.

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4. References

- Advisory Council on Historic Preservation Guidance.
- Curation of Federally Owned and Administered Archaeological Collections (36 CFR 79) Proposed Rule. Federal Register, Vol. 52, No. 167. August 28, 1987.
- Guidelines for Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act. Federal Register, Vol. 53, No. 31. February 17, 1988.
- How to Apply the National Register Criteria for Evaluation. (Bulletin 15). National Park Service, U.S. Department of the Interior, Washington, DC. 1982.
- Identification of Historic Properties: A Decision-making Guide for Managers. Advisory Council on Historic Preservation, Washington, DC. 1988.
- National Historic Preservation Act of 1966. PL 89-665; STAT. 915; USC 470, as amended by PL 91-243, PL 94-458, PL 96-199, PL 96-244, and PL 96-515.
- National Register Bulletin Series. National Park Service, Department of the Interior, Washington, DC.
- National Register of Historic Properties (36 CFR Part 60).
- Preparing Agreement Documents. Advisory Council on Historic Preservation, Washington, DC. 1989.
- Protection of Historic Properties (36 CFR Part 800).
- Public Participation in Section 106 Review: A Guide for Agency Officials. Advisory Council on Historic Preservation, Washington, DC. 1989.
- Secretary of Interior's Standards and Guidelines for Archaeology and Historic Preservation. Federal Register, Vol. 48, No. 190. September 29, 1983.
- Section 110 Guidelines: Annotated Guidelines for Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act. Jointly issued by the Advisory Council on Historic Preservation and the National Park Service, U.S. Department of the Interior, Washington, DC. 1989.
- Uniform Rules and Regulations: Archaeological Resources Protection Act of 1979 (43 CFR Part 7). Federal Register, Vol. 43, No. 4. January 6, 1984.
- Where to Look: A Guide to Preservation Information. Advisory Council on Historic Preservation, Washington, DC. 1983.
- U.S. Army Engineer, St Louis District. *U.S. Army National Guard Cultural Resources Planning Level Survey*. St. Louis, MO: U.S. Army Engineer District, St Louis Mandatory Center For the Curation and Management of Archaeological Collections, 1998.
- U.S. Department of Interior. Standards and Guidelines for Archaeology and Historic Preservation. 1983.
- Washington Army National Guard's Integrated Cultural Resources Management Plan. 2007.

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Appendices

- A – Glossary**
- B – National Environmental Policy Act Review and Correspondence**
- C – Planning Level Survey and Historic Contexts**
- D – Virtual Installation Overview**
- E – ICRMP Distribution List and Points of Contact**
- F– Annual Updates**
- G – Resource Estimate “For Official Use Only”**
- H – Cultural Resources Laws and Regulations**
- I– Cultural Resources Manager’s Guidance**
- J– Sample Documents and Training Brief**

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APPENDIX A

GLOSSARY

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Glossary

Advisory Council on Historic Preservation (ACHP) – The ACHP was established by Title 11 of the National Historic Preservation Act 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 National Historic Preservation Act.

Archaeological Artifacts – An object, a component of an object, a fragment or sherd of an object, that was made or used by humans; a soil, botanical or other sample of archaeological interest.

Archaeological Records – Notes, drawings, photographs, plans, computer databases, reports, and any other audio-visual records related to the archaeological investigation of a site.

Archaeological Resource – Any material of human life or activities that is at least 100 years of age and is of archaeological interest (32 CFR 229.3(a)).

Area of Potential Effect (APE) – The geographical area within which the undertaking may cause changes in the character of or use of historic properties, if any such properties exist. The APE may change according to the regulation under which it is being applied and should be established in coordination with consulting parties.

Categorical Exclusion (CX) – Under NEPA, a CX is a category of actions that a Federal agency has determined does not to have a significant effect on the environment, either individually or cumulatively. Every Federal agency has a list of CXs.

Code of Federal Regulations (CFR) – Includes the government-wide regulations that all federal agencies must follow and have the force of law.

Cultural Items – 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 federally recognized tribe or Native Hawaiian organization, rather than property owned by an individual Native American, and which, therefore, cannot be alienated, appropriated, or conveyed by any individual of the tribe or group).

Cultural Landscape – A cultural landscape is a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values. A cultural landscape can be a historic site, historic designed landscape, historic vernacular landscape, or ethnographic landscape (Cultural Resource Management Guidelines, NPS-28).

Cultural Landscape Approach – To serve as an organizing principle for cultural and natural features in the same way that the idea of an ecosystem serves as an organizing principle for different parts of the natural environment.

Cultural Resources – Historic properties as defined by the NHPA; cultural items as defined by NAGPRA; archaeological resources as defined by ARPA; sites and sacred objects to which access is afforded under AIRFA; and collections and associated records as defined in 36 CFR 79.

Cultural Resources Management Program – Activities carried out under the authority of AR 200-1 to comply with federal statutes and regulations pertaining to cultural resources.

Environmental Assessment (EA) – Under NEPA, an EA is prepared when an agency does not know if a proposed Federal action has potentially significant effects on the environment. EAs conclude either with a Finding of No Significant Impact (FNSI) or Notice of Intent (NOI) to prepare an Environmental Impact Statement.

Environmental Impact Statement (EIS) – Under NEPA, an EIS is prepared for major Federal actions that could have potentially significant effects on the environment.

Geographical Information System (GIS) – Electronic maps that can provide information regarding identified structures and archaeological sites that are potentially NRHP-eligible, or that have been determined to be NRHP-eligible.

Indian Tribe – Any tribe, band, nation, or other organized American Indian group or community of Indians, including any Alaska Native village or corporation as defined in or established by the Alaska Native Claims Settlement Act (43 USC 1601 *et seq.*) that is recognized as eligible for special programs and services provided by the United States to Indians because of their status as Indians. Such acknowledged or “federally recognized” Indian tribes exist as unique political entities in a government-to-government relationship with the United States. The Bureau of Indian Affairs maintains the listing of federally recognized Indian tribes.

Installation – For real property purposes, an installation is a single site or a grouping of two or more sites for inventory reporting. Each State represents a single virtual installation consisting of all sites the State controls except sites designated as training installations. Training installations can be their own installations if they have their own command structure and if ARNG-ARI and ARNG-ART have jointly agreed that they may be listed as their own ARNG training installation. One or more sites may be assigned to any one installation but each can only be assigned to a single installation. An installation can exist in three possible forms:

A single site designated as an installation, (e.g., Camp Roberts, CA);

Several non-contiguous or contiguous sites grouped together as a single ARNG training installation (e.g., Camp Shelby, MS).

Several contiguous or non-contiguous sites grouped together as a single virtual installation, (e.g., ARNG manages all the sites in a single state as a virtual installation).

Integrated Cultural Resources Management Plan (ICRMP) – A 5-year plan developed and implemented by an installation commander to provide for the management of cultural resources in a way that maximizes beneficial effects on such resources and minimizes adverse effects and impacts without impeding the mission of the installation and its tenants.

Memorandum of Agreement (MOA) – A formal written agreement containing the results of discussions among the federal agency, the SHPO, and the ACHP, and can include Tribes, other entities, state agencies, and/or interested public. The MOA documents mutual agreements upon statements of facts, intentions, procedures, and parameters for future actions and matter of coordination. It shows how the needs of the federal agency, the needs and desires of the Tribes, public and the scientific / historical significance of the property have all been protected. An MOA is not required by law or regulation except to resolve adverse effects issues (see 36 CFR 800.6(c)). In all other circumstances, it is an optional tool that can be used to ensure compliance with NHPA. Typically, an MOA is used to spell out the roles of the signatories in mitigating the effects of an action on a historic property.

National Historic Landmark (NHL) – National Historic Landmarks are buildings, historic districts, structures, sites, and objects that possess exceptional value in commemorating or illustrating the history of the United States. They are so designated by the Secretary of the Interior after identification by National Park Service professionals and evaluation by the National Park System Advisory Board, a committee of scholars and other citizens.

National Park Service – The bureau of the Department of the Interior to which the Secretary of the Interior has delegated the authority and responsibility for administering the National Historic Preservation Program.

National Register Criteria – The criteria established by the Secretary of the Interior for use in evaluating the eligibility of properties for the NRHP (36 CFR 60).

National Register of Historic Places (NRHP) – A nationwide listing of districts, sites, buildings, structures, and objects of national, state, or local significance in American history, architecture, archaeology, or culture that is maintained by the Secretary of the Interior. NRHP listings must meet the criteria found in 36 CFR 60.4.

Paleontological Resources – Scientifically significant fossilized remains, specimens, deposits, and other such data from prehistoric, non-human life.

Parcel – a parcel is a contiguous piece or pieces of land described in a single real estate instrument. A parcel can also be described as a specific area of land whose perimeter is delineated by metes and bounds or other survey methods. A parcel represents each individual land acquisition by deed or grant (i.e., each separate real estate transaction). A single real estate transaction may acquire multiple parcels. Each parcel is shown by a single lot record in the Real Property Inventory (RPI). Parcels are, therefore, the building blocks of land for a site. A parcel is created by a real estate transaction whereby a Military Department or the State acquires an interest in land, and a legal instrument evidences the interest so acquired.

Planning Resource for Infrastructure Development and Evaluation (PRIDE) – The PRIDE database is the Planning Resource for Infrastructure Development and Evaluation (PRIDE). It is a centralized database to support the identification of assets within an installation at each state. It provides ARNG with real property information from which to manage its real property assets. The PRIDE database includes information about facilities, equipment, and grounds at each installation, and information regarding whether the building has been evaluated for its eligibility to the NRHP and whether it is eligible for or listed on the NRHP. The PRIDE does not contain information regarding archaeological sites at installations.

Predictive Model – Modeling used to determine areas of high, medium, and low archaeological potential.

Programmatic Agreement (PA) – A formal agreement between agencies to modify and/or replace the Section 106 process for numerous undertakings in a program. A PA will outline modified Section 106 procedures that streamline an agency's regulatory obligations.

Real Property Development Plans (RPDP) – A written resource prepared by the State ARNG, to be consulted and used during the preparation of an ICRMP, specifically in dealing with existing and planned structures at a virtual installation (the State).

Record of Environmental Consideration (REC) – A document that is used to explain how an action is covered in a CX.

Section 106 – Under the NHPA, Section 106 provides direction for federal agencies regarding undertakings that affect properties listed or those eligible for listing on the NRHP, and is implemented by regulations (36 CFR 800), issued by the ACHP.

Section 110 – Under the NHPA, Section 110 outlines agencies' broad responsibilities with respect to historic properties and requires federal agencies to locate, inventory, and nominate all properties that may qualify for the NRHP. It also mandates that the agency's preservation-related activities are carried out in consultation with other Federal, State, and local agencies, and Native American tribes carrying out historic preservation activities, and with the private sector in compliance with Section 106 of the act.

Section 111 – Under the NHPA, Section 111 addresses leases and exchanges of historic properties. It allows the proceeds of any lease to be retained by the agency for use in defraying the costs of administration, maintenance, repair, and related expenses of historic properties.

Site – in the broadest terms a site is a geographic location. In more focused terms, a site is a specific area of land consisting of a single parcel or several contiguous parcels. Each site must be able to produce a closed cadastral survey. A site can be any physical location that is or was owned by, leased to, or otherwise possessed by one Military Service or State (for National Guard purposes), to include locations under the jurisdiction of the Army National Guard (ARNG) where a hazardous substance has been deposited, stored, disposed of, placed, or otherwise came to be located. Do not combine Federal parcels with state parcels in a single site, even if contiguous. There will be no sites that contain both Federal and state owned property; create separate sites. A site may exist in one of three forms:

- Land only, where there are no facilities present and where the land consists of either a single parcel or two or more contiguous parcels.
- Facility or facilities only, where the underlying land is neither owned nor controlled by the Federal or State government. A stand-alone facility can be a site. If a facility is not a stand-alone facility, it must be assigned to a site.
- Land and all the facilities thereon, where the land consists of either a single parcel or two or more contiguous parcels.

Example of rule applied - a state or municipal owned road that traverses an area. The rule defines such an area as a single site if the military retains controls or ownership of the land under the road. However, if the road and the right-of-way along the road are owned by a party other than the Military Department, than this would be two sites since contiguous ownership does not exist.

Site Locational Models – A model, through past examples, used to predict locations of archaeological sites. An example is the DAHP predictive model.

State Historic Preservation Officer (SHPO) – The person who has been designated in each state to administer the State Historic Preservation Program, including identifying and nominating eligible properties to the NRHP and otherwise administering applications for listing historic properties in the NRHP.

Survey – A scientific sampling of the extent and nature of archaeological resources within a specific area.

Training Installation – Refers to one of the 45 training installations operated by the ARNG (see list in Handbook).

Tribal Historic Preservation Officer (THPO) – The Tribal Historic Preservation Officer (THPO) is the tribal official appointed by the tribe's chief governing authority or designated by a tribal ordinance or preservation program who has assumed the responsibilities of the SHPO for the purposes of Section 106 compliance on tribal lands in accordance with Section 101(d)(2) of the National Historic Preservation Act. Tribes that have not been so certified have the same consultation and concurrence rights as THPOs when the undertaking takes place, or affects historic properties, on their tribal lands. During any such undertakings, THPOs as well as non-certified tribal cultural resources managers or Tribal Chairs would be consulted in addition to the SHPO.

Tribes – "Tribes" (with a capital T) is used inclusively throughout this ICRMP to include American Indian tribes, Alaska Natives and organizations, Native Americans, and Native Hawaiians, and organizations as defined in the National Historic Preservation Act and the Native American Graves Protection and Repatriation Act.

Undertaking – “An undertaking is 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” (36 CFR 800.16{y}).

Virtual Installation – (Standard definitions according to DoDI 4165.14). A virtual installation refers to all holdings of a WAARNG within the boundaries of WA.

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APPENDIX B
NATIONAL ENVIRONMENTAL POLICY ACT REVIEW
AND CORRESPONDENCE

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A. Signed FNSI of WAARNG ICRMP 2007

FINDING OF NO SIGNIFICANT IMPACT ENVIRONMENTAL ASSESSMENT FOR IMPLEMENTATION OF AN INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN AT WASHINGTON ARMY NATIONAL GUARD FACILITIES

Introduction

The Washington Army National Guard (WAARNG) prepared an environmental assessment (EA) to identify and evaluate potential environmental effects from implementing an Integrated Cultural Resources Management Plan (ICRMP) at facilities throughout Washington. The WAARNG prepared the EA in accordance with the National Environmental Policy Act (NEPA) (42 USC § 4321 to 4370e), the Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA (CEQ Regulations, 40 CFR Parts 1500–1508), and *Environmental Analysis of Army Actions* (32 CFR 651).

1. Description of Proposed Action and Alternatives

Proposed Action. The WAARNG proposes to implement the ICRMP for its facilities in Washington during fiscal years 2006 through 2010. Department of Defense Instruction (DODI) 4715.3 *Environmental Conservation Program* and Army Regulation (AR) 200-4 *Cultural Resources Management* require development of an ICRMP. The ICRMP establishes explicit responsibilities, standard operating procedures, and long-range goals for managing cultural resources on WAARNG lands, in compliance with all applicable laws and regulations, while ensuring the safety and efficiency of federal and state missions. Cultural resources include historic properties, cultural items, Indian sacred sites, and archaeological resources. The proposed action is the WAARNG's preferred alternative.

Alternatives Considered. The WAARNG analyzed a no-action alternative. Current cultural resources management measures would remain in effect under the no-action alternative but there would be no comprehensive plan to integrate mission needs with cultural resources protection. The WAARNG does not consider the no-action alternative viable because it does not meet the requirements of AR 200-4 and DODI 4715.3. An environmental analysis of a no-action alternative is required by CEQ Regulations to serve as a benchmark against which the proposed action can be evaluated.

2. Environmental Analysis

Based on the analysis contained in the EA, it has been determined that the known and potential impacts of the proposed action on the physical, cultural, and natural environment would be of a positive nature. Implementation of the WAARNG's ICRMP would result in the efficient management of cultural resources at WAARNG facilities. The goals included in the ICRMP require integration with natural resources, military training, and facility management. As a

6. Finding of No Significant Impact

Based on the information presented in the final EA, the WAARNG proposes to implement the preferred alternative. The requirements of NEPA and the CEQ regulations will have been met. An environmental impact statement will not be prepared, and the National Guard Bureau will issue this FNSI.

10 Sep 2007

Date



Jeffrey G. Phillips,
Colonel, U.S. Army
Chief, Environmental Programs Division

B. Signed Record of Environmental Consideration

Enviro Tracking #:	ARNG ENVIRONMENTAL CHECKLIST	State ARNG
	Enter information in the yellow shaded areas.	WAARNG
PART A - PROJECT INFORMATION		
1. PROJECT NAME: ICRMP 5-year Update Preparation		
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED: 1-Dec-12
4. DESCRIPTION AND LOCATION OF THE PROJECT/PROPOSED ACTION:		
a. Location (Include a Detailed Map): Statewide ICRMP (See attached map of WAARNG installations)		
b. Description: WAARNG is updating its Integrated Cultural Resources Management Plan (ICRMP). The first ICRMP was approved in September 2007. (See attached Executive Summary for highlights of the 5-year updates on the ICRMP)		
c. The proposed action will involve (check all that apply):		
<input type="checkbox"/> Training Activities/Areas <input type="checkbox"/> Construction <input type="checkbox"/> Natural Resource Management <input type="checkbox"/> Maintenance/Repair/Rehabilitation <input type="checkbox"/> Real Estate Action <input checked="" type="checkbox"/> Environmental Plans/Surveys <input type="checkbox"/> Innovative Rediness Training Project <input type="checkbox"/> Other (Explain):		
d. Project Size (Acres): (if applicable)		d. Acres of New Surface Disturbance (Proposed): (if applicable)
N/A		N/A
5. START DATE of PROPOSED ACTION (dd-mmm-yy): 1-Jan-14 Note: This must be a future date.		
6. PROGRAMMED FISCAL YEAR (if applicable): N/A		
7. END DATE (if applicable): 30-Sep-18		
PART B - DECISION ANALYSIS GUIDE		
To use a categorical exclusion, the project must satisfy the following three screening criteria: no segmentation, no exceptional circumstances and a qualifying categorical exclusion that covers the project. The following decision tree will guide the application and documentation of these three screening criteria. The criteria were extracted from 32 CFR Section 651.29 and represent the most common screening conditions experienced in the ARNG. NOTE: Each question in Part B must have a block checked for concurrence with REC.		
1. Is this action segmented (the scope of the action must include the consideration of connected, cumulative, and similar actions)? <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #2)		
2. Is there reasonable likelihood of significant environmental effects (direct, indirect, and cumulative)? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #3)		
3. Is there a reasonable likelihood of significant effects on public health, safety or the environment? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #4)		
4. Is there an imposition of uncertain or unique environmental risks? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #5)		
5. Is the project of greater scope or size than is normal for the category of action? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #6)		
6. Does the project introduce or employ unproven technology? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #7)		

PART B - DECISION ANALYSIS (continued)

7. Will there be reportable releases of hazardous or toxic substances as specified in 40 CFR Part 302? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #8)
8. Will air emissions exceed de minimus levels or otherwise require a formal Clean Air Act (CAA) conformity determination? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input checked="" type="checkbox"/> N/A (go to #9) <input type="checkbox"/> YES (go to #30) <input type="checkbox"/> NO; ensure RONA is completed and on-file at State (go to #9)
9. Will the project have effects on the quality of the environment that are likely to be highly controversial? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #10)
10. Will the project establish a precedent (or make decisions in principle) for future or subsequent actions that are reasonably likely to have future significant effects? If action meets screening criteria but is assessed in an existing EA or EIS, check NO and proceed to the next question. <input type="checkbox"/> YES (go to #30) <input checked="" type="checkbox"/> NO (go to #11)
11. Has federal funding been secured for the Innovative Readiness Training project? <input checked="" type="checkbox"/> N/A (go to #13) <input type="checkbox"/> YES (go to #13) <input type="checkbox"/> NO (go to #12)
12. NOTE: IRT projects not currently funded can secure approved NEPA documentation. However, once funding is secured State ARNG is required to coordinate with ARNG-ILE-T to complete natural and cultural surveys via proponent funding. <input type="checkbox"/> CONFIRMED (go to #27)
13. Do you have a species list from the U.S. Fish and Wildlife Service that is less than 90 days old? <input checked="" type="checkbox"/> YES (go to #14) Date of List: 2/15/2014 <input type="checkbox"/> NO (update species list return to #13) <input type="checkbox"/> N/A (go to #14)
14. In reviewing the species list, what determination was made by the State ARNG? <input type="checkbox"/> No species present (go to #16) <input checked="" type="checkbox"/> No effect (go to #16) <input type="checkbox"/> May affect but not likely to adversely affect (go to #16) <input type="checkbox"/> May affect likely to adversely affect (go to #15)
15. Does an existing Biological Opinion cover the action? <input type="checkbox"/> YES (go to #16) <input type="checkbox"/> NO (go to #30)
16. Have the Endangered Species Act, Section 7 requirements been completed? <input checked="" type="checkbox"/> YES (go to #17) Date of Documentation: 2/15/2014 <input type="checkbox"/> NO (complete documentation, return to #16)
17. Does the project involve an undertaking to a building or structure that is 50 years of age or older? <input type="checkbox"/> YES (go to #18) <input checked="" type="checkbox"/> NO (go to #20)
18. Has the building or structure been surveyed for the National Register of Historic Places? <input type="checkbox"/> YES (go to #19) <input type="checkbox"/> NO (complete inventory, return to #18)
19. Is the building or structure eligible for or listed on the National Register of Historic Places? <input type="checkbox"/> YES (go to #20) <input type="checkbox"/> NO (go to #20)
20. Does the action involve ground disturbing activities? <input type="checkbox"/> YES (go to #21) <input checked="" type="checkbox"/> NO (go to #22)
21. Has an archaeological inventory or research been completed to determine if there are any archeological resources present? <input type="checkbox"/> YES (go to #22) <input type="checkbox"/> NO (complete inventory or conduct research, return to #21)
22. In reviewing the undertaking, under the National Historic Preservation Act (NHPA) (for both above and below ground resources), what determination was made by the State ARNG? <input type="checkbox"/> No resources present (go to #24) <input type="checkbox"/> No properties affected (go to #24) Date of SHPO Concurrence: <input checked="" type="checkbox"/> No adverse affect (go to #24) Date of SHPO Concurrence: 10/07/2013 <input type="checkbox"/> Adverse affect (go to #23)
23. Has the State ARNG addressed the adverse effect? <input type="checkbox"/> YES (place date of MOA or existing PA and explanation of mitigation in box below, go to #24) <input type="checkbox"/> NO (go to #30)
23a.

PART B - DECISION ANALYSIS (continued)

24. Per DoDI 4710.02 did the state ARNG determine that tribal consultation was necessary for this project?
 YES (provide date of MFR, go to #25) Date of MFR: **February 15, 2014**
 NO (Provide reason in this block 24a, go to #27)

24a. Tribal consultation and public review had been conducted. Most of the Tribes did not provide comments. Those Tribes that responded had mostly no comment. Only Stillaguamish Tribe sent a formal comment letter.

25. Did the Tribes express an interest or respond with concerns about the project?
 N/A (go to #27) YES (go to #26) NO (go to #27) Date of Documentation: **2/15/2014**

26. Has the State ARNG addressed the Tribal concerns?
 YES (place date of MOU or explanation of how State ARNG addressed tribal concerns in box below, go to #27)
 NO (address concerns, return to #26)

Complete only if additional documentation is required in question #26

26a. WAARNG sent a formal response letter to the Stillaguamish Tribe. All other tribes received and e-mail response .

27. Does the project involve an unresolved effect on areas having special designation or recognition such as those listed below? For any yes responses go to #30 otherwise go to #28. If any No response is a result of negotiated and/or previously resolved effects please describe resolution in box 27a below.

TYPE	Unresolved Effects?	TYPE	Unresolved Effects?
a. Prime/Unique Farmland	No	e. Wild/Scenic River	No
b. Wilderness Area/National Park	No	f. Coastal Zones	No
c. Sole-Source Aquifer	No	g. 100-year Floodplains	No
d. Wetlands	No	h. National Wildlife Refuges	No

27a.

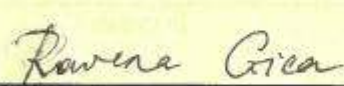

28. Is this project addressed in a separate EA or EIS review?
 YES (complete table below; go to Part C, Determination) NO (go to #29)

Document Title:	ICRMP
Lead Agency:	WAARNG
Date of Decision Document:	Sep-07

29. Does the project meet at least one of the categorical exclusions listed in 32 CFR 651 App B?
 YES (complete table below; go to Part C, Determination) NO (go to #30)

List primary CAT EX code	
Describe why CAT EX applies	

30. At this time your project has not met all the qualifications for using a categorical exclusion under 32 CFR 651. Unless the scope of the project is changed, it will require an Environmental Assessment or possibly an Environmental Impact Statement. If you feel this is in error, please call your NEPA Regional Manager to discuss. If needed, go to Part C Determination.

Enviro Tracking #:	ARNG Record of Environmental Consideration	State ARNG
	Enter information in the yellow shaded areas.	WAARNG
1. PROJECT NAME: ICRMP 5-year Update Preparation		
2. PROJECT NUMBER: (MILCON if applicable)		3. DATE PREPARED: 1-Dec-12
4. START DATE of PROPOSED ACTION (dd-mmm-yy): 1-Jan-14		Note: This must be a future date
5. PROGRAMMED FISCAL YEAR: N/A		
6. END DATE:		30-Sep-18
7. DESCRIPTION AND LOCATION OF THE PROPOSED ACTION:		
a. Location (Include a Detailed Map): Statewide ICRMP (See attached map of WAARNG installations)		
b. Description: WAARNG is updating its Integrated Cultural Resources Management Plan (ICRMP). The first ICRMP was approved in September 2007. (See attached Executive Summary for highlights of the 5-year updates on the ICRMP)		
8. CHOOSE ONE OF THE FOLLOWING:		
<input checked="" type="checkbox"/> An existing Environmental Assessment adequately covers the scope of this project. Attach FNSI if EA was completed by another federal agency (non-ARNG). EA Date (dd-mmm-yy): 1-Sep-07 Lead Agency: WAARNG		
<input type="checkbox"/> An existing Environmental Impact Statement adequately covers the scope of this project. EIS Date (dd-mmm-yy): Lead Agency:		
<input type="checkbox"/> After reviewing the screening criteria and completing the ARNG Environmental Checklist, this project qualifies for a Categorical Exclusion Code: See 32 CFR 651 App. B		
<input type="checkbox"/> This project is exempt from NEPA requirements under the provisions of: Cite superseding law:		
9. REMARKS:		
 Signature of Proponent (Requester)		 Environmental Program Manager
Rowena Valencia-Gica Printed Name of Proponent (Requester)		Thomas O. Skjervold Printed Name of Env. Program Manager
Feb. 28, 2014 Date Signed		Feb 28, 2014 Date Signed
10. STATE/ORGANIZATION: Washington Military Department		11. SERVICE COMPONENT: WAARNG
12. ADDRESS: 36 Quartermaster Rd, Camp Murray WA 98430		
13. PROPONENT/UNIT NAME: Washington Military Department		14. POC:
15. PROPONENT/UNIT ADDRESS: 36 Quartermaster Rd, Camp Murray WA 98430		
16. COMM VOICE: 253-512-8704	17. COMM FAX: 253-512-8904	18. DSN: 323-8704
19. DSN FAX: 323-8904	20. EMAIL: rowena.valencia-gica@mil.wa.gov	

PART C - DETERMINATION

On the basis of this initial evaluation, the following is appropriate:

- IAW 32 CFR 651 Appendix B, the proposed action qualifies for a Categorical Exclusion (CX) that does not require a Record of Environmental Consideration.
- A Record of Environmental Consideration (REC).
- An Environmental Assessment (EA).
- A Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

Rowena Gica
Signature of Proponent (Requester)

Thomas O. Skjervold
Environmental Program Manager

Rowena Valencia-Gica
Printed Name of Proponent (Requester)

Thomas O. Skjervold
Printed Name of Env. Program Manager

Feb. 28, 2014
Date Signed

Feb 28, 2014
Date Signed

Other concurrence (as needed):

Signature

Signature

Printed Name

Printed Name

Date Signed

Date Signed

Signature

Signature

Printed Name

Printed Name

Date Signed

Date Signed

Signature

Signature

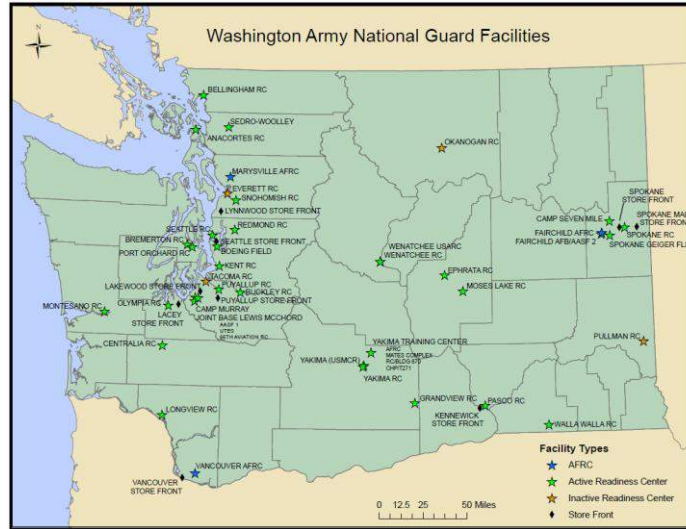
Printed Name

Printed Name


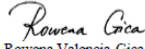
Date Signed

Date Signed

**Attachment A
Map of WAARNG Installations**



**Attachment B
ESA Consult Memorandum for Record**

<div style="text-align: center;">  <p>STATE OF WASHINGTON MILITARY DEPARTMENT <i>Camp Murray • Tacoma, Washington 98430-5000</i></p> </div> <p>MEMORANDUM FOR THE RECORD September 19, 2013</p> <p>TO: Jay Rubinoff Natural Resources PM ARNG-ILE-T</p> <p>FROM: Rowena Valencia-Gica, PhD Natural and Cultural Resources PM Environmental Programs WAARNG/WMD</p> <p>SUBJECT: WAARNG's ICRMP 5-Year Revision: Determination of No Effects under Section 7 ESA Consultation</p> <ol style="list-style-type: none"> 1. The Washington Army National Guard (WA ARNG) is preparing an Integrated Cultural Resources Management Plan (ICRMP) 5-Year Revision for its facilities statewide. 2. The ICRMP Revision document builds upon the original ICRMP in terms of including those elements identified as significant issues by internal and external stakeholders during the review process for the original ICRMP. This ICRMP Revision includes the following: <ul style="list-style-type: none"> • The addition of new policies and regulations such as AR 200-1, Executive Orders (EO) 13287 (Preserve America), EO 13327 (Federal Real Property Asset Management), and EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management), Department of Defense Instruction (DoDI) 4710.02, the Department of the Army's (DA) Program Comments on Unaccompanied Housing Structures and Ammunition Storage Facilities, and recent amendments to the National Historic Preservation Act (NHPA) and the Native American Graves Protection and Repatriation Act (NAGPRA) • New guidance on the ARNG Status Tool for the Environmental Program (STEP) program for project funding and data calls for the Army Environmental Database – Environmental Quality (AEDB-EQ) report, EO 13327, the Planning Resources for Infrastructure Development and Evaluation (PRIDE), the DoD Minimum Antiterrorism Standards for Buildings (Unified Facilities Criteria [UFC] 4-010-01), sustainability, and tribal consultation • Introduction of new terminology for ARNG infrastructure: virtual installation, training installation, site, lot, and facility • A focus on the results of the WAARNG cultural resources program over the past 5 years and how various successes and challenges have informed the goals and projects proposed for the program over the next 5 years. 	<p>ESA Section 7 Consult MFR Page 2 of 2 September 19, 2013</p> <ul style="list-style-type: none"> • Streamlining of the Standard Operating Procedures (SOPs) such that guidance specific to the responsibilities of the WAARNG Cultural Resources Manager (CRM) is minimized (this guidance is now included in a CRM's Toolbox in Appendix I of the ICRMP Revision) and instructions for non-environmental personnel are emphasized. Flow charts have been added to each SOP to make them more comprehensible to the non-specialist. <ol style="list-style-type: none"> 3. This ICRMP Revision also includes input from stakeholders obtained through the review process for the original ICRMP, additional input from stakeholders obtained through the review process for the ICRMP revision, and information provided by the WAARNG Cultural Resources Manager. 4. This ICRMP Revision establishes priorities for the identification and standards for the evaluation of cultural resources within the WAARNG virtual installation, and provides a schedule to accomplish program objectives during a 5-year program. 5. The ICRMP also provides a brief description of the WAARNG virtual installations, an overview of all known cultural resources across all WAARNG sites, the status of inventory and evaluation of resources at each site and training installation, and appropriate compliance and management activities for the next 5 years. 6. The WA ARNG reviewed the list of threatened and endangered species for the state of Washington. Based on the nature of this project, no federally listed threatened or endangered species would be adversely impacted. 7. Point of contact for this memo is the undersigned, (253) 512-8704, Rowena.valencia-gica@ml.wa.gov. <div style="text-align: right; margin-top: 20px;">  Rowena Valencia-Gica </div>
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TRIBAL AND AGENCY CORRESPONDENCE

1. Summary Table for SHPO and Tribal Consults

Title	Contact	Agency	First Consult* (12/16/2013)	Second Consult (1/21/2014)	Response
Dr.	Allyson Brooks	Department of Archaeology and Historic Preservation	E-mailed formal letter on 10/1/2013 to Request for Concurrence to Revise ICRMP	mail formal letter of Request for Comments on Revised ICRMP + CD	Concurred on ICRMP Revision (10/7/2013); See attached letter of comments on ICRMP Update
The Honorable	David Burnett	Chehalis Confederated Tribes	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Richard Bellon				
Mr.	Michael Finley	Colville Confederated Tribes	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	Okanogan Armory received 100% pedestrian survey and is used by the CCT as part of the adaptive reuse plan. Section 106 process is appropriate.
The Honorable	John Sirois				
Mr.	Guy Moura				
The Honorable	William Iyall	Cowlitz Indian Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Dave Burlingame				
The Honorable	Maria Lopez	Hoh Indian Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Alexis Barry				
The Honorable	Ron Allen	Jamestown S'Klallam Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	E-mail on 1/21/2014 indicated that he will review the ICRMP. No comment received as of the date of this MFR.
Mr.	Gideon U. Cauffman				
The Honorable	Glen Nenema	Kalispeel Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Kevin Lyons				
The Honorable	Frances Charles	Lower Elwha Klallam Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Bill White				
The Honorable	Timothy Ballew II	Lummi Nation	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Ms.	Lena Tso				
The Honorable	Timothy J. Greene Sr.	Makah Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Ms.	Janine Bowechop				
The Honorable	Virginia Cross	Muckleshoot Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Ms.	Laura Murphy				
The Honorable	Cynthia Iyall	Nisqually Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Ms.	Jackie Wall				
Ms.	Annette Bullchild				
The Honorable	Bob Kelly	Nooksack Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Geroge Swanaset Jr.				
The Honorable	Jeromy Sullivan	Port Gamble S'Klallam Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Josh Wisniewski				
The Honorable	Herman Dillon	Puyallup Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	Phone conversation on 1/27/2014 with Mr. Reynon indicated that they will provide comment. No comment received as of the date of this MFR.
Mr.	Brandon Reynon				
The Honorable	Tony Foster	Quileute Nation	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Ms.	Deanna Hobson				
The Honorable	Fawn Sharp	Quinault Nation	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Justine James				

Summary Table for Agency and Tribal Consults (cont.)

Title	Contact	Agency	First Consult (12/16/2013)	Second Consult (1/21/2014)	Response
The Honorable	Tom Wooten	Samish Nation	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	No comments via e-mail from Ms. Jackie Ferry.
Ms.	Jackie Ferry				
The Honorable	Norma Joseph	Sauk-Suiattle Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Charlene Nelson	Shoalwater Bay Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Earl Davis				
The Honorable	Charles "Guy" Miller	Skokomish Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Ms.	Kris Miller				
Ms.	Carolyn Lubenau	Snoqualmie Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Shelley Burch				
Mr.	Steve Mullen-Moses				
The Honorable	Rudy Peone	Spokane Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Randy Abrahamson				
The Honorable	Dave Lopeman	Squaxin Island Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Ms.	Rhonda Foster				
The Honorable	Shawn Yanity	Stillaguamish Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	E-mail from Ms. Kristin Michaud requested for review extension to Feb. 6, 2014 (granted). Requested another extension to Feb. 20 (granted). Comments received on 2/21/14.
Mr.	Kerry Lyste				
Mr.	Leonard Forsman	Suquamish Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Dennis Lewarch				
The Honorable	Brian Cladoosby	Swinomish Indian Tribal Community	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	E-mail on 1/21/2014 from Mr. Cladoosby indicated that they will review the ICRMP. No comment received as of the date of this MFR.
Mr.	Larry Campbell				
Ms.	Theresa Trebon				
The Honorable	Melvin Sheldon Jr.	Tulalip Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Richard Young				
Mr.	Tim Brewer				
The Honorable	Jennifer Washington	Upper Skagit Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	E-mail on 1/21/2014 requested for status of archaeological survey for Sedro Woolley facility and for the Tribe to be consulted for any ground-disturbing activities at Sedro Woolley facility
Mr.	Scott Schuyler				
The Honorable	Harry Smiskin	Yakama Nation	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
Mr.	Johnson Meninick				
Ms.	Kate Valdez				
Mr.	Rex Buck	Wanapum Band	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Ray Gardner	Chinook Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Cecile Hansen	Duwamish Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Kurt Weinreich	Kikiallus Indian Nation	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Robert Davis Jr.	Marietta Band of Nooksack Indians	mail formal letter + CD	Phone call	Letter returned to WAARNG; Phone call on 1/22/2014 revealed that the Tribe is no longer organized.
The Honorable	Michael didahalqid Evans	Snohomish Tribe of Indians	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Earny Sandstrom	Snoqualmoo Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Danny K. Marshall	Steilacoom Indian Tribe	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	
The Honorable	Gary Burke	Umatilla Confederated Tribes	mail formal letter + CD	e-mail letter + pdf of ICRMP Revision	Ms. Ferman replied on 1/22/2014 - changed Chairman to Gary Burke; no other comments on ICRMP
Ms.	Teara Farrow Ferman				

MFR FOR AGENCY/TRIBAL CONSULT



STATE OF WASHINGTON
MILITARY DEPARTMENT
Camp Murray, WA 98430-5000

February 28, 2014

NGB-ARE-C
111 So. George Mason Drive
Arlington, VA 22204-1382

MEMORANDUM FOR RECORD

SUBJECT: Tribal and Agency Consultation for the WAARNG's ICRMP 5-Year Update

The WMD/WAARNG through the Environmental Programs conducted its agency and tribal consultation for the WAARNG's ICRMP 5-Year Revision document during the following dates:

October 01, 2013 – Consultation with Department of Archaeology and Historic Preservation (DAHP)/State Historic Preservation Office (SHPO) for the WAARNG's ICRMP Revision project. Concurrence received on October 7, 2013.

December 16, 2013 - Consultation with the SHPO and all federally and non-federally recognized Native American Tribes in the State of Washington and one from the State of Oregon (CTUIR) that has an interest in cultural resources in neighboring WA locations. A formal letter was sent to each agency/Tribe containing an electronic (CD) copy of the ICRMP Update.

December 30, 2013 – Letter sent to Marietta Band of Nooksack Tribe returned to WAARNG (address not found).

January 21, 2014 –E-mail sent to all federally and non-federally recognized Native American Tribes consulted on December 16, 2013 to follow-up on the status of their review of the WAARNG's ICRMP Update.

January 13, 2014 – E-mail response requesting for review extension until February 6, 2014 received from Stillaguamish Tribe. WAARNG CRM responded on the same day approving the request for extension.

January 21, 2014 – E-mail responses received from Upper Skagit Tribe, Jamestown S'Killalam Tribe and Swinomish Tribe. No comment on the ICRMP. WAARNG CRM responded on the same day.

January 22, 2014 – E-mail response received from CTUIR. WAARNG CRM responded on the same day. Follow-up phone call made to Marietta Band of Nooksack Tribe to verify address and request for review. WAARNG was told that the Marietta Band Tribe is no longer organized.

January 23, 2014 – Formal comment letter received from the SHPO. Short e-mail response to SHPO sent by the WAARNG CRM.

February 4, 2014 – E-mail response received from the Samish Indian Nation – no comments on the WAARNG's ICRMP.

February 21, 2014 – Formal comments letter received from the Stillaguamish Tribe – comments on confidentiality of cultural resource information, 30-day review period, artifacts curation, consultation process, historic context and predictive models, and traditional cultural properties. WAARNG received an e-mail comment from Colville Confederated Tribe indicating their Tribe's concurrence on the appropriateness of following the Section 106 process.

February 28, 2014 – Formal response to comments sent by the WAARNG CRM to the Stillaguamish Tribe.

No other response from all the other Tribes consulted had been received as of the date of this MFR. Letters sent to the SHPO and Tribes are included as attachments to the REC/Checklist.

Point of contact for this action is the undersigned at 253-512-8704 or Rowena.Valencia-Gica@mil.wa.gov.

Sincerely,



Rowena Valencia-Gica, Ph.D.
Natural and Cultural Resources Program Manager

2. Letter of Request for SHPO Concurrence on WAARNG's 5-Year ICRMP Revision



STATE OF WASHINGTON
MILITARY DEPARTMENT
Camp Murray • Tacoma, Washington 98430-5000

October 01, 2013

Dr. Allyson Brooks
State Historic Preservation Officer
Department of Archaeology & Historic Preservation
1063 South Capitol Way, Suite 106
Olympia WA 98501

Re: Washington Army National Guard's ICRMP 5-Year Revision

Dear Dr. Brooks,

The Washington Army National Guard (WAARNG) would like to consult with your agency regarding the revision of the 2007 Integrated Cultural Resources Management Plan (ICRMP) for lands/facilities managed by the WAARNG.

Department of Defense policy (DoD Instruction 4715.3), Army regulations, and Washington state historic preservation laws require the development of an ICRMP for the protection and management of cultural resources. Most WAARNG installations are armories (readiness centers) and storage buildings/maintenance shops located on small parcels of property (10 acres or less), some of which had been determined eligible for listing to the National Register of Historic Places. The WAARNG has two larger installations including Camp Murray (approximately 240 acres) adjacent to Joint Base Lewis-McChord, and Camp Seven Mile (approximately 340 acres) near Spokane.

As a component of the installation master plan, the ICRMP is the WAARNG commander's decision document for conducting cultural resources management actions and specific compliance procedures. The ICRMP also provides a brief description of the WAARNG virtual installations, an overview of all known cultural resources across all WAARNG sites, the status of inventory and evaluation of resources at each site and training installation, and appropriate compliance and management activities for the next five years.

The WAARNG has been managing cultural resources for several years under a previously developed ICRMP. A 5-year ICRMP Revision is developed that builds upon the original ICRMP in terms of inclusive elements, identified as significant issues by internal and external stakeholders during the review process for the previous ICRMP. It will differ from the previous ICRMP in several respects, such as addition of new/revised policies and regulations, introduction of some new terminologies relevant to cultural resources management, and evaluation of the results of the cultural resources program over the previous five years, among others.

Based on the nature of this project, the WAARNG determined that the revision of the 2007 ICRMP will not adversely affect the historic and cultural resources present at the affected installations. We would like to request for your concurrence on our determination.


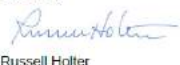




We will be sending a copy of our ICRMP to your office soon for your review. If you have any questions about this consultation or the WAARNG's ICRMP Revision, please contact the undersigned, Tel. (253) 512-8704, Fax (253) 512-8904, or e-mail at Rowena.valencia-gica@mil.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Rowena Gica".

Rowena Valencia-Gica, Ph.D.
Environmental Specialist

3. SHPO Concurrence and Comments on WAARNG's 5-Year ICRMP Revision

 <p style="text-align: right;">Alyson Brooks Ph.D., Director State Historic Preservation Officer</p> <p>October 7, 2013</p> <p>Dr. Rowena Valencia-Gica, Ph.D. Natural & Cultural Resources Manager Washington Military Department Building 36 Quartermaster Rd Camp Murray, WA 98430-5000</p> <p>In future correspondence please refer to: Log: 100713-14-MIL Property: WAARNG ICRMP Revisions Re: More Information Needed</p> <p>Dear Dr. Valencia-Gica, Ph.D.:</p> <p>Thank you for contacting the Department of Archaeology and Historic Preservation (DAHP). I have reviewed the materials you provided for this project. Although we have no specific comments regarding the revisions to the ICRMP at this point, the State Historic Preservation Officer (SHPO) would be pleased if the Washington State Military Department included DAHP Staff in planning process and was afforded an opportunity to review and comment on the changes as the new ICRMP is developed.</p> <p>I would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR600.4(a)(4) and the ICRMP when it is available. These comments are based on the information available at the time of this review and on behalf of the SHPO pursuant to Section 106 of the National Historic Preservation Act and its implementing regulations 36CFR600.</p> <p>Thank you for the opportunity to review and comment. Should you have any questions, please feel free to contact me.</p> <p>Sincerely,</p>  <p>Russell Holter Project Compliance Reviewer (360) 586-3533 russell.holter@dahp.wa.gov</p>	
 <p style="text-align: right;">Alyson Brooks Ph.D., Director State Historic Preservation Officer</p> <p>January 23, 2014</p> <p>Dr. Rowena Valencia-Gica, Ph.D. Natural & Cultural Resources Manager Washington Military Department Building 36 Quartermaster Rd Camp Murray, WA 98430-5000</p> <p>In future correspondence please refer to: Log: 100713-14-MIL Re: Draft WAARNG ICRMP</p> <p>Dear Dr. Valencia-Gica, Ph.D.:</p> <p>Thank you for your letter to State Historic Preservation Officer Alyson Brooks regarding the Washington Army National Guard (WAARNG) revision to the 2007 Integrated Cultural Resources Management Plan (ICRMP) for 2013-17. As you are aware, the ICRMP provides WAARNG guidance for cultural resource management on its lands and facilities.</p> <p>In response, Department of Archaeology and Department (DAHP) staff, including Russ Holter, Rob Whillam and myself, have reviewed the Draft ICRMP. As a result of our review, we are providing the following comments and recommendations:</p> <ol style="list-style-type: none"> 1. A general comment is a word of thanks to WAARNG for updating the ICRMP and affording DAHP an opportunity to review and comment. DAHP appreciates WAARNG's continuing work to protect significant cultural resources within its jurisdiction. We recognize and support WAARNG for its past accomplishments in implementing previous ICRMPs. We also appreciate our strong and positive working relationship with you and your staff toward implementing the plan. 2. On page ES-3 and in regard to #2, reference to 2012 should probably be changed to 2019. 3. The plan mentions that energy efficiency evaluations will take place on WAARNG's historic structures. We recommend that language be included to reference the Secretary of the Interior's Standards for Rehabilitation (Standards) be used to guide policy on adapting structures for the purposes of energy efficiency. 4. When developing cultural education training and promotional materials, please contact DAHP for reviewing, planning, and/or participating in these efforts. 5. The executive summary references the development of a "historic preservation plan for maintenance of historic buildings at Camp Murray." We see this is proposed for initiation in 2014 and look forward to reviewing the plan. However, we recommend ongoing contact with DAHP to participate in reviewing the scope and content of the plan. 6. In regard to discussion about disposing of historic WAARNG facilities, we recommend that the Guard engage with DAHP early in the process for disposing or transferring these properties out of state ownership. For example, in ES-2, there is reference to on-going work to find a location for a new Olympia-Thurston County readiness center. Since the existing Olympia center is considered to be National Register eligible we <p style="text-align: center;">State of Washington • Department of Archaeology & Historic Preservation P.O. Box 46343 • Olympia, Washington 98504-6343 • (360) 586-3565 www.dahp.wa.gov</p> 	<p>recommend a pro-active effort be implemented to identify a short and long-term preservation strategy for the building.</p> <p>7. We also recommend that WAARNG develop, adopt, and implement policies and guidelines for disposal of its properties that are historic. These policies/guidelines should be incorporated into the ICRMP and/or other applicable WAARNG plans and documents.</p> <p>Thank you again for the opportunity to review and comment on the Draft ICRMP. Should you have any questions or comments, please feel free to contact me at 360-586-3073 or greg.griffith@dahp.wa.gov</p> <p>Sincerely,</p>  <p>Gregory Griffith Deputy State Historic Preservation Officer</p> <p style="text-align: center;">State of Washington • Department of Archaeology & Historic Preservation P.O. Box 46343 • Olympia, Washington 98504-6343 • (360) 586-3065 www.dahp.wa.gov</p> 

4. Sample Tribal Letter Sent

<div data-bbox="451 243 509 302" data-label="Image"></div> <div data-bbox="355 304 638 361" data-label="Text"><p>STATE OF WASHINGTON MILITARY DEPARTMENT Camp Murray • Tacoma, Washington 98430-5000</p></div> <div data-bbox="207 392 329 411" data-label="Text"><p>December 06, 2013</p></div> <div data-bbox="207 424 449 459" data-label="Text"><p>The Honorable < >, Chairman <Tribal Address></p></div> <div data-bbox="207 474 529 493" data-label="Text"><p>Re: Review of WAARNG's ICRMP 5-Year Revision</p></div> <div data-bbox="207 508 406 527" data-label="Text"><p>Dear Chairman < >,</p></div> <div data-bbox="207 541 777 630" data-label="Text"><p>The Washington Army National Guard (WAARNG) would like to consult with the <Tribe's Name> regarding the revision of the 2007 Integrated Cultural Resources Management Plan (ICRMP) for lands/facilities managed by the WAARNG. Consultation is conducted in accordance with 36 CFR Part 800.2, Executive Order 13175, and the DoD American Indian and Alaska Native Policy.</p></div> <div data-bbox="207 642 782 745" data-label="Text"><p>Department of Defense policy (DoD Instruction 4715.3), Army regulations, and Washington state historic preservation laws require the development of an ICRMP for the protection and management of cultural resources. Most WAARNG installations are armories (readiness centers) located on small parcels of property (10 acres or less). WAARNG has two larger installations including Camp Murray (approximately 240 acres) adjacent to Joint Base Lewis-McChord, and Camp Seven Mile (approximately 340 acres) near Spokane.</p></div> <div data-bbox="207 758 786 861" data-label="Text"><p>As a component of the installation master plan, the ICRMP is the WAARNG commander's decision document for conducting cultural resources management actions and specific compliance procedures. The ICRMP also provides a brief description of the WAARNG virtual installations, an overview of all known cultural resources across all WAARNG sites, the status of inventory and evaluation of resources at each site and training installation, and appropriate compliance and management activities for the next 5 years.</p></div> <div data-bbox="207 873 782 961" data-label="Text"><p>The WAARNG has been managing cultural resources for several years under a previously developed ICRMP. A 5-year ICRMP Revision is developed that builds upon the original ICRMP in terms of including those elements identified as significant issues by internal and external stakeholders during the review process for the previous ICRMP. It differs from the previous ICRMP in several respects including the following:</p></div> <div data-bbox="219 974 784 1077" data-label="List-Group"><ul style="list-style-type: none">• <i>The addition of new policies and regulations such as Army Regulation (AR) 200-1, Executive Orders (EO) 13287 (Preserve America), EO 13327 (Federal Real Property Asset Management), and EO 13423 (Strengthening Federal Environmental, Energy, and Transportation Management), Department of Defense Instruction (DoDI) 4710.02, the Department of the Army's (DA) Program Comments on Unaccompanied Housing Structures and Ammunition Storage Facilities, and recent amendments to the National</i></div>	<div data-bbox="902 241 1117 298" data-label="Text"><p>ICRMP 5-Year Revision Consult Page 2 of 2 December 06, 2013</p></div> <div data-bbox="935 325 1461 363" data-label="Text"><p><i>Historic Preservation Act (NHPA) and the Native American Graves Protection and Repatriation Act (NAGPRA)</i></p></div> <div data-bbox="914 371 1515 667" data-label="List-Group"><ul style="list-style-type: none">• <i>New guidance on the ARNG Status Tool for the Environmental Program (STEP) for project funding and data calls for the Army Environmental Database – Environmental Quality (AEDB-EQ) report, EO 13327, the Planning Resources for Infrastructure Development and Evaluation (PRIDE), the DoD Minimum Antiterrorism Standards for Buildings (Unified Facilities Criteria [UFC] 4-010-01), sustainability, and tribal consultation</i>• <i>Introduction of new terminology for ARNG infrastructure: virtual installation, training installation, site, lot, and facility</i>• <i>A focus on the results of the WAARNG cultural resources program over the past 5 years and how various successes and challenges have informed the goals and projects proposed for the program over the next 5 years.</i>• <i>Streamlining of the Standard Operating Procedures (SOPs) such that guidance specific to the responsibilities of the WAARNG Cultural Resources Manager (CRM) is minimized (this guidance is now included in a CRM's Toolbox in Appendix I of the ICRMP Revision) and instructions for non-environmental personnel are emphasized. Flow charts have been added to each SOP to make them more comprehensible to the non-specialist.</i></div> <div data-bbox="902 674 1494 802" data-label="Text"><p>An electronic (CD) copy of the WAARNG's ICRMP Revision is included with this letter. We invite you to join us in consultation regarding the development of the WAARNG's ICRMP 5-year Revision. Your input will enable us to better protect our cultural resources as we conduct our missions. To ensure that your concerns are considered and that our plan maximizes public input and coordination, your prompt attention is appreciated. If we do not receive a response within 30 days, we will contact you to confirm your receipt of this letter and request for your input regarding cultural resources on WAARNG lands.</p></div> <div data-bbox="902 819 1494 873" data-label="Text"><p>If you have any questions about this consultation or the WAARNG's ICRMP Revision, please contact Dr. Rowena Valencia-Gica, Tel. (253) 512-8704, Fax (253) 512-8904, or e-mail at Rowena.valencia-gica@mil.wa.gov.</p></div> <div data-bbox="1221 890 1297 911" data-label="Text"><p>Sincerely,</p></div> <div data-bbox="1221 961 1369 1018" data-label="Text"><p>Bret D. Daugherty Major General The Adjutant General</p></div> <div data-bbox="902 1033 974 1052" data-label="Text"><p>Enclosure</p></div>
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5. Follow-Up Consult (Sample E-mail)

From: Valencia-Gica, Rowena B (MIL)
Sent: Tuesday, January 21, 2014 12:06 PM
To:
Cc:
Subject: WA Army National Guard ICRMP 5-Year Update Request for Review
Attachments: DRAFT_ICRMP_5yearUpdate_WAARNG_20140115.pdf

Dear Chairman < >,

This e-mail is to follow-up on the status of your review of the Washington Army National Guard's (WAARNG) Integrated Cultural Resources Management Plan (ICRMP) 5-Year Update.

The WAARNG would like to consult with the <Tribe's Name> regarding the revision of our 2007 ICRMP to ensure that your Tribe's concerns are considered and that our plan maximizes public input and coordination. On December 16, 2013, we sent your Tribe a copy of the WAARNG's ICRMP Revision with a letter of request for review. To date, we haven't heard from you. I am therefore attaching a pdf copy of said document for your review.

If you have any questions about this consultation or the WAARNG's ICRMP Revision, please do not hesitate to contact the undersigned. We'd greatly appreciate your input. Your input will enable us to better protect WAARNG's cultural resources as we conduct our missions.

If we do not receive a response within the next 15 days, we will assume that your Tribe does not have any comments/suggestions and will proceed in finalizing the WAARNG's ICRMP in accordance with the provisions of 36 CFR 800.3(c)(4), 800.5(c)(1), and 800.55(d).

Sincerely,

Rowena Valencia-Gica, Ph.D.
Environmental Specialist
36 Quartermaster Road, Camp Murray WA 98430
Tel. 253-512-8704; Fax 253-512-8904; DSN 323-8704

6. Public Notice

STATE OF WASHINGTON – KING COUNTY

--SS.

305910
MILITARY DEPARTMENT

No.

Affidavit of Publication

The undersigned, on oath states that he is an authorized representative of The Daily Journal of Commerce, a daily newspaper, which newspaper is a legal newspaper of general circulation and it is now and has been for more than six months prior to the date of publication hereinafter referred to, published in the English language continuously as a daily newspaper in Seattle, King County, Washington, and it is now and during all of said time was printed in an office maintained at the aforesaid place of publication of this newspaper. The Daily Journal of Commerce was on the 12th day of June, 1941, approved as a legal newspaper by the Superior Court of King County.

The notice in the exact form annexed, was published in regular issues of The Daily Journal of Commerce, which was regularly distributed to its subscribers during the below stated period. The annexed notice, a

PN:ICRMP PLAN AVAILABILIT

was published on

12/30/13

The amount of the fee charged for the foregoing publication is the sum of \$134.40 which amount has been paid in full.

MELISSA M. DOWD
STATE OF WASHINGTON
NOTARY PUBLIC
MY COMMISSION EXPIRES
11-21-15

Affidavit of Publication

12/30/2013

Notary public for the State of Washington,
residing in Seattle

State of
Washington
Notice of Availability

Washington Army National
Guard and National Guard
Bureau

Notice of Availability
WAARNG's Integrated
Cultural Resources
Management Plan (ICRMP)
5-Year Revision

Camp Murray, Washington

The Washington Army National Guard and the National Guard Bureau prepared a 5-Year ICRMP Revision document that builds upon the 2007 ICRMP that WAARNG has used to manage cultural resources in its facilities statewide. To ensure that all stakeholder concerns are considered, public comments are being solicited.

Copies of the WAARNG's ICRMP can be viewed at the following locations:

• Environmental Programs, 36 Quartermaster Road, Camp Murray WA 98430

• Timberland Regional Library, 313 8th Avenue SE, Olympia WA 98501

• Seattle Public Library (Central), 1000 Fourth Avenue, Seattle WA 98104

• Yakima Valley Libraries, 102 N 3rd St Yakima, WA 98901

• Spokane Public Library, 906 West Main Avenue, Spokane, WA 99201

An electronic copy of the ICRMP can also be viewed online at:

[http://mil.wa.gov/](http://mil.wa.gov/Environmental/Army.shtml)

[Environmental/Army.shtml](http://mil.wa.gov/Environmental/Army.shtml)

Electronic comments must be submitted by January 30, 2013. Mailed written comments must be postmarked on or before January 30, 2013. Please mail or e-mail comments to:

Rowena Valencia-Gica, Ph.D.
Environmental Programs
Washington Military
Department

Bldg. 36 Quartermaster
Road, Camp Murray WA

Tel: (253) 512-8704; Fax:
(253) 512-8904

E-mail: rowena.valencia-gica@mil.wa.gov

Date of publication in
the Seattle Daily Journal of
Commerce, December 30, 2013.

12/30(305910)

APPENDIX C

PLANNING LEVEL SURVEY AND HISTORIC CONTEXTS

The purpose of the context is to provide a basic understanding of the historic and prehistoric components of the region to aid in the evaluation of sites.

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PREHISTORIC CONTEXT

The prehistory of Washington State has been organized in a multitude of ways since the mid-twentieth century. The differences are usually based on specific localized and regional differences in material culture or different theoretical backgrounds. The approach here compresses these competing organizational schemes into three generalized schemes commonly used across North America to gain a cursory understanding of large-scale change through time across Washington.

Paleo-Indian Period (14,000—7000 BP)

The first human inhabitants visited Washington as early as 12,000–14,000 years ago. This initial period of human occupation in North America is generally referred to as the Paleo-Indian period. Big game exploitation with distinctive large and fluted spear points characterizes the Paleo-Indian period in eastern Washington. The Paleo-Indian economy along the Pacific shoreline focused more on maritime food resources. Four technological traditions influenced the Puget Sound area between 10,000–9000 BP. These include the Fluted Point, the Stemmed Point, the Pebble Tool, and the Microblade traditions.

Archaic Period (7000–2500/3000 BP)

Following the Paleo-Indian period, a trend of diversification of plant and animal resources is witnessed in Washington. An interval of punctuated climatic fluctuations between ca 8000–4500 Before Present (BP) strongly affected much of the Pacific Northwest by reducing habitat productivity. Following this interval of instability, several trends are noticed in the archaeological record including: increase in population, increased sedentary living, and changes in the use of food resources. Other trends are also visible in the archaeological record and include increased occupation of riparian areas, more intensive food storage and fish exploitation, and the first appearance of pit or subterranean houses with wooden roofs. Overall, the Archaic period in Washington represents a great florescence of diversity in technology, settlement choices, and subsistence strategies.

Late Prehistoric Period (2500/3000–300 BP)

The Late Prehistoric period in Washington mirrors trends in many other parts of North America including increased population expansion, increased aggregated village settlement, and the adoption of the bow and arrow (ca 2500 BP). More elaborate burial internment practices are observed as are the use of large cemeteries. Botanical goods such as basketry, cordage, and matting are preserved from this time period, although earlier peoples probably produced them. Increased specialization and intensification in root processing and salmon harvesting also occurs during the Late Prehistoric period. The coming of the horse and full blown contact with Europeans mark the end of the Late Prehistoric period.

HISTORIC CONTEXT

A historic context is built around three variables: theme, place, and time. Regarding military properties in Washington, the overarching theme is military preparedness. The chronological eras in this context include four periods:

- Territorial Period (1853–1889)
- Early Statehood (1889–1917)
- World Wars and Inter-war Period (1917–1946)
- Modern Washington National Guard (1946–present)

Site-specific contexts developed for the facilities being evaluated in this report include:

- Camp Murray
- Redmond National Guard Facility

Within each chronological era, it is possible to identify historic themes unique to the period or that represent different patterns from one period to the next.

In addition to theme, place, and time, a historic context relies on the concept of a *property type* for practical applications. As stated in the Secretary of the Interior's Standards:

"Historic contexts, as theoretical constructs, are linked to actual historical properties through the concept of property type. Property types permit the development of plans for identification, evaluation and treatment even in the absence of complete knowledge of individual properties."

A property type is simply a building, structure, or other type of property known to have been associated with a historic theme. For example, the adoption of the radio in the early twentieth century resulted in construction of a predictable property type: the radio transmitting and receiving station. Knowing that the military quickly adopted radio communication in the early 1900s, one can predict that the military also built radio receiving and transmitting stations during this period. Recognizing the importance of this development to the military gives one a measure for the significance of any resource that may be associated with that particular historic theme.

The historic context presented below provides information pertaining to identified themes, places, and times for the development of the WAARNG facilities. This information was used in determining significance and potential NRHP eligibility of individual and clusters of structures at each of the examined armories.

History of the WAARNG

The following context was developed from the WAARNG ICRMP (EDAW 2002) and other sources, which are noted parenthetically. Section 5.0 contains a bibliography.

Territorial Period

The provisional government of the Oregon Territories was established in 1843, and claimed all of what is now the state of Washington. Oregon became a territory in 1849, and Washington Territory was organized in 1853, with Isaac Stevens first named as governor. The governor called for a militia act, and in 1855 two companies of militia were formed, one in Olympia and the other in Vancouver. Although none of the militia companies saw heavy action, there were a number of incidents involving unrest, including the Whitman Massacre of 1847.

In 1861, volunteers from the Washington Territory occupied various posts in the territory, thus releasing regular troops for duty in the East. After the Civil War, and following a pattern used during the Civil War, wealthy citizens organized and paid volunteer companies to fight in the Nez Perce and Bannock Indian Wars. Veterans of these campaigns returned to their communities as potential leaders of an organized militia. Two pioneer units, the Dayton Grays and Battery A, Light Artillery of Walla Walla, organized themselves in 1880. In the following year these two distinguished units, plus the Grant Guards, joined to organize the First Regiment of the National Guard of Washington. With the organization of several other companies throughout the state, the acting adjutant general, Russell G. O'Brien, arranged for the first summer encampment at Chamber's Prairie, south of Olympia, in 1885.

During the anti-Chinese riot in Seattle and Tacoma in 1886, the militia companies were called upon to restore order and to protect the Chinese. Soon after this, the First Regiment of Militia was organized. In 1888, the legislature enacted the Militia Act, formally designating the territorial militia as the Washington National Guard.

Early Statehood

Republicans hoping to solidify their hold on Congress passed an omnibus bill in 1889 granting statehood to much of the Dakota, Washington, and Montana territories. On 11 November 1889, the president issued a proclamation officially granting statehood to Washington, Montana, North Dakota, and South Dakota.

By 1895, the National Guard was well established in all states, including Washington, and was becoming more professional. In fact, nationwide guard personnel strength stood at 115,699. This was more than four times greater than the regular Army (Doubler 2003). A few years later, the National Guard responded to President McKinley's call for a volunteer quota from each state to support the Spanish-American War, and in a matter of a few days more than filled its quota. The First Washington Volunteer Infantry Regiment, numbering 1,200 men and known as the "Fighting First of Washington," served in the Philippines (a lesser known front) from 1898 to 1899.

In 1903, the state acquired a parcel of land south of Tacoma for a training site. This parcel of land, eventually known as Camp Murray, would later become the headquarters of the Washington National Guard. In 1907, the state secured a site for a state armory in Tacoma. At the time, Guard officials were stipulating that armories had to be large enough to support a unit's administrative, training, and recreational activities. They were also to have a distinctive martial look and be constructed of concrete or brick. The Tacoma building, designed, constructed, and completed by 1908, clearly met all the conditions described above. The nearly 100,000-square foot, castle-like structure co-housed cavalry and infantry companies. By 1909, armories were established in Seattle and Spokane, as well as Tacoma. To augment federal coastal defense operations, the Army created a Coastal Artillery Reserve Corps. One such company, the 205th Coast Artillery, was activated in the Washington National Guard in 1909.

In 1916, during the Mexican Revolution, over 1,000 Washington National Guardsmen were patrolling the border at Calexico, California.

World Wars and Inter-war Period

In the spring and early summer (March to July) 1917, with the coming of World War I, the 2nd Infantry Regiment of WAARNG was ordered to mobilize at its home stations. Guard units from the Northwest composed part of the new 41st Division or "Sunset Division." Upon reaching France, the division was split, sending the 146th Field Artillery to the front as part of the expeditionary forces. The division was given the mission to train newly arrived U.S. troops prior to sending them to the front. Upon returning from France, units were re-established and provided a reserve for the standing federal Army. As with many areas of the United States, Washington experienced post-war labor violence, and guard units in Everett, Spokane, and Centralia were mobilized to support the local civilian authorities. Keeping pace with emerging technologies, the state's first air unit, the 116th Observation Squadron, was organized in 1924.

The stock market crash of 29 October 1929, sent the nation into economic and social turmoil. With rampant unemployment and dim prospects, the National Guard experienced a surge in membership because the organization provided badly needed income. Guard units had waiting lists of men wanting to volunteer for service. In the 1930s, the National Guard provided economic support in other ways, as well. Most notably was the federally funded armory construction performed by the Works Progress Administration, one of President Franklin Delano Roosevelt's most successful New Deal programs (Doubler 2003). Armories in Centralia, Olympia, and Pullman are legacies of the Works Progress Administration.

During the summer of 1940, the 41st Division was activated and began what was to be known as the "Good-bye dear, see you in a year" training camp. The troops spent a miserably soggy winter in Camp Murray's tent city, suffering from influenza and the global uncertainty of 1940. In November and early December of 1941, the division was beginning its move to San Francisco to reinforce the U.S. Army in the Philippines when it learned of the attack on Pearl Harbor. The Sunset Division fought with distinction throughout the South Pacific islands and the Philippines until released from federal service in 1945. The

161st Infantry Regiment, as part of the 25th Division, fought on Guadalcanal and in the Philippines. Both units were scheduled to be heavily involved in the invasion of Japan. The 803rd Armor Battalion was reorganized as the 803rd Tank Destroyer Battalion and served in France and Germany. The 248th and 205th Coast Artillery Regiments occupied coastal installations at Fort Worden and Fort Casey. The end of the war returned all of the Washington National Guard units to state control in 1946.

Modern Washington National Guard (1946–present)

The Army National Guard grew dramatically after World War II. The combination of new members, additional units, and modern technology created a crisis of sorts. There was no space to house equipment or the soldiers. Local units were forced to improvise and used attics and cellars of courthouses, schools, and other buildings in an attempt to meet their needs. Finally, in 1950, Congress enacted legislation that called for federal assistance for new armory construction for all reserve components, including the Army National Guard. The Defense Facilities Act (Public Law 783) provided significant federal support for building construction. The states were only responsible for 25% of the construction cost, the provision of real estate, furnishings and other equipment, and operating costs. All other costs were defrayed by federal funds.

It took two years before the program was appropriated any money. But, by 1952, and especially in the three following years, the benefits of the Defense Facilities Act began to be realized. All armories were based on standard designs for single and multiple units. Gone were the ornate castellated building designs of the first part of the century, or the art deco designs of the Works Progress Administration. The new armories were more modern, smaller, and less individualized than their predecessors. In fact, they were most often based on standardized plans developed by the U.S. Army Corps of Engineers. The armories were expected to cost between \$444,000 and \$1.8 million, depending on size, which varied directly with the size of the company the building was expected to house. There were minor local modifications, but in essence, the armories were quite similar nationwide (ANG 2004). The armory structures represented the changing role of the armories. No longer just places for meetings and social events, the 1950s armories were designed as fully equipped training centers, often with classrooms (Doubler 2003). Standardized plans for hangars, maintenance facilities, warehouses, and motor vehicle storage buildings were developed as well (Army National Guard 2004). A number of Washington armories and motor vehicle storage buildings were built with Defense Facilities Act funds.

With the start of hostilities in Korea in 1950, the Washington Air National Guard (WAANG), the 66th Field Artillery Group, the 420th Anti-Aircraft Artillery Battalion, and several smaller units, were activated. The 116th Fighter Interceptor Squadron gained the distinction of being the first jet fighter / interceptor squadron to cross an ocean. The flight was from Spokane, across the United States, then across the Atlantic Ocean to England. Units were returned to state control in February 1953.

In the early 1980s, non-brigade elements were brought under one umbrella as the 96th Troop Command. On 18 May 1980, the majority of the WAARNG was mobilized to support the rescue of injured victims and to assist in the massive cleanup caused by the explosion of Mount St. Helens. The 1980s saw an ever-increasing use of the WAARNG by the governor to save lives and to protect property from the effects of flooding and forest fires.

In the summer of 1990, the WAANG was instrumental in providing air refueling capabilities for the massive airlift of personnel and equipment to Saudi Arabia. This support continued throughout the U.S. involvement in the area of operations. In September 1990, the 116th Rear Area Operations Center was activated and deployed to Saudi Arabia and participated in Desert Shield / Storm. The 541st Personnel Services Company was also activated and deployed to Fort Ord, California, providing much needed administrative and personnel services support to the units preparing for Desert Storm. By early spring of 1991, all the mobilized units had been returned to state control.

SITE-SPECIFIC CONTEXTS

Camp Murray

As stated above, WAARNG use of the site that was to become Camp Murray began in 1903. With an appropriation of \$6,600, the state purchased 220 acres near American Lake. Initially, the site was used merely for annual training and as a meeting location when the National Guard was activated (Grulich 1992). There were no permanent structures on the site in its first years of existence. It actually did not become a permanent facility until 1915, when the training site was officially named Camp Murray in honor of Isaiah G. Murray, a local pioneer settler (R. Christopher Goodwin & Associates, Inc. 2005).

As early as 1914, Adjutant General Fred Llewellyn requested funds to construct a storage warehouse and caretaker's house at the site. The funds were provided and two years later, the arsenal (building 00002) was the first permanent building at the training site. The caretaker's residence was incorporated into the arsenal building. The presence of an arsenal allowed the WAARNG to store equipment onsite rather than transporting it from the arsenal in Seattle whenever training was taking place.

As World War I drew to a close, Maurice Thompson, the state adjutant general, embarked on a program to modernize the Washington National Guard. An element of this program was the movement of his headquarters from Seattle to Camp Murray (Grulich 1992). In 1921, the adjunct general's residence (building 118) was constructed a short distance from the arsenal near a small creek (Murray Creek). Camp Murray took shape over the next seven years, and was officially designated as the WAARNG state headquarters in 1928.

Much of the development was centered on an arc formed by Murray Creek to the east and a railroad spur to the south. Some of the buildings constructed during this period are still standing and are included in this survey. For example, the artillery material and tent warehouse (building 00007) was built near the arsenal in 1925. It is still used for storage. Four buildings, a machine shop and truck shed (building 00003), a wagon shed (building 00012), a single cottage (building 00024), and a fire station (building 00026), that were built in 1927, are still in use (though not necessarily the original use). The headquarters building (building 00001) was completed in 1928, and one year later the subsistence warehouse (building 00025) was constructed.

Development continued into the 1930s. Most of the funding for the projects came from federal allocations from the War Department and public works project funding related to the New Deal. The continued expansion of the training site was triggered in part by its role as the training locale for the 41st Division, which consisted of National Guard units from Washington, Oregon, Idaho, Montana, and Wyoming. The only buildings from the 1930s that are still standing include the original greenhouse (building 00023) and a quarters building (now building 00065, BOQ, and Officer's Club).

Camp Murray's infrastructure grew dramatically as a result of the mobilizations associated with World War II. By 23 September 1940, 14,000 men were training at Camp Murray in preparation for service overseas. Indeed, the necessity for barracks and associated structures was paramount (Grulich 1992). Within the year, a number of such structures were built at the training camp. Some are still standing. These include what were originally an additional artillery material and tent warehouse (now building 00005), dining halls (buildings 00046 and 00053), quarters buildings (buildings 00047 and 00048,) a small administrative building with an associated garage (now buildings 00049 and 00049A), and an auditorium (now building 00097).

Camp Murray continued to grow in the late 1940s and 1950s, though not quite as dramatically. A number of buildings were constructed to support maintenance and storage needs. Again, some of the structures are still standing and include what were originally a flammable storage shed (designated as building 00022), a motor shed (building 00028), a vehicle storage building (building 00029), combined support maintenance shop (CSMS) storage (building 00030), a large CSMS (building 00031), a general storage building (building 00031A), and an engineer armory (building 00032) that has been converted to offices

and warehouse for the United States Property and Fiscal Office (USPFO). Many of these buildings were built as part of the program initiated by the Defense Facilities Act.

The infrastructure of Camp Murray continues to evolve in order to keep pace with the challenges associated with the need to meet the demands of changing missions. This often involves the construction of new buildings and structures and the renovation of existing buildings. However, there is also an understanding of the necessity to protect the historic and natural character of the area. It is within this framework that Camp Murray and WAARNG look toward the future.

Redmond National Guard Facility

NIKE Missile Program

The NIKE missile program was probably the largest defensive building program in the United States since the Civil War and “The funding, development, and deployment of the NIKE missiles can be seen as a broad metaphor for the American conduct of the cold war. As prevailing perceptions and attitudes about the Soviet Union changed, so did the defense programs to which they gave rise” (Bright 1997).

By the late 1940s, the United States and Soviet Union became locked in what came to be known as the cold war and its associated arms race. Within this framework, analysts became concerned that the Soviet Union might be able to attack the United States with atomic warheads delivered from aircraft, and urged a program of increased air defense. Anti-aircraft guns were not a viable option because the rapid advancements in aircraft design made them less than effective. It was also important to be able to intercept attacking aircraft at a distance, especially since they were ostensibly armed with nuclear warheads. To this end, Bell Laboratories and Douglas Aircraft Company developed a self-propelled, remotely guided, anti-aircraft missile. The system was being refined by 1951. The 34-foot missiles (NIKE Ajax) could travel twice the speed of sound and were guided by three radars. The acquisition radar would identify attacking airplanes 125 miles away; the target tracking radar would follow the target once the missile was within 25 miles of it; and the missile tracking radar communicated route changes to the missile.

Beginning in 1951, a nationwide network of NIKE installations was planned with facilities surrounding the cities of Washington and Baltimore, Norfolk, Boston, New York, Niagara Falls, Philadelphia, Pittsburgh, Chicago, Detroit, San Francisco, Los Angeles, Seattle, and Hanford (in Washington State) given first priority. Each locale would have four to twelve batteries (Bright 1997). Parcels were selected for lease or purchase within 25 miles of each municipal center, and they had to meet specific topographical, geographic, and utility requirements. The sites were laid out with a central control area of 10 to 15 acres that contained the radar and other control electronics, barracks, offices, a mess hall, and any other support buildings or structures. Topographically, the control area had to be elevated, flat, and open so radar could sweep the sky and guide the missiles in flight. The buildings at the NIKE sites were constructed from standardized drawings developed by the U.S. Army Corps of Engineers. There was some minor deviation from the standardized plans when land availability, obstructions, or community concerns dictated (Harvey 2004).

The missiles were stored at launch sites between 0.67 and 3.5 miles away from the control center in a direction that was away from the municipal center (Bright 1997). Launch sites were between 40 and 60 acres and contained underground storage magazines, launch equipment, and buildings used for assembling, fueling, testing, and servicing the missiles. Launch sites may also contain barracks, administrative and recreation buildings, pump houses, and other support structures.

The NIKE Ajax missiles were deployed nationally in 1954. Shortly thereafter, President Dwight D. Eisenhower’s administration, in an effort to make military defense more efficient, called for a new NIKE missile that had nuclear capability, thereby having the ability to destroy more targets at once. By 1958, the NIKE Hercules replaced the Ajax. It was slightly larger, but had a much greater range and used conventional and nuclear warheads. Since there were already over 3,000 launchers in service, the

Hercules missiles were designed to fit in the existing infrastructure with minor modifications. Installation and development of the missiles consumed 48% of the Army's construction budget in 1958 (it had also consumed 37% of the construction budget in 1957) (Bright 1997).

The NIKE program was always in flux, and by 1960, the United States began to phase NIKE sites out across the country (Harvey 2004). The program was reaching its nadir in the late 1960s, due to political and strategic concerns that were shifting away from the NIKE missile program. Better intelligence had indicated that, while the Soviet Union did have long-range bombers, their effectiveness was not as profound as was once thought. Moreover, the Soviets were reducing their bomber fleet and building intercontinental ballistic missiles instead. The United States reacted by focusing less on defensive capabilities and instead began developing offensive nuclear weapons with the capability to inflict extensive damage. The concept of mutually assured destruction became a hallmark of the latter half of the cold war. Due to this new strategy and budget cuts, the Secretary of Defense decided, in 1973, to close all but four of the 52 active NIKE sites in the United States (Bright 1997).

Redmond NIKE

Beginning in 1954, the Army installed 11 NIKE batteries in the greater Seattle/Tacoma area. They were operational for about 20 years. The last shut down in March 1974. The facilities were located in Bothell/Kenmore, Redmond, Cougar Mountain, Lake Youngs, Kent, Vashon Island, Ollala, Poulsbo, Bainbridge Island, Fort Lawton, and Kingston.

The Redmond NIKE was constructed in 1954, and was one of the last facilities to go off-line in 1974. The site consisted of a hill top control area with multiple buildings and support structures. The launch area, with 24 launchers, was just over one mile east of the control area. When the NIKE program converted from Ajax to Hercules missiles, 11 of the launchers were modified to support the new weapons. After the facility was taken off-line, it was conveyed into private and public ownership. Today, the launch area and approximately half of the original control area are in private ownership. WAARNG has retained the core of the control area at Redmond. (The WAARNG also retained the significantly modified Kent NIKE site).

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APPENDIX D

VIRTUAL INSTALLATION OVERVIEW

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Virtual Installation Overview

This appendix provides a brief description of the WAARNG virtual installation, an overview of all known cultural resources within the WAARNG virtual installation, and the status of those resources at each site and training installation. This chapter also identifies areas where cultural resources could exist, however, sufficient research has not been completed to identify these potential and unknown resources.

As stated in Chapter 1, the WAARNG has a dual mission. The federal mission is to maintain properly trained and equipped units available for prompt mobilization for war, national emergency, or as otherwise needed. The state mission is to provide trained and disciplined forces for domestic emergencies or as otherwise required by state laws. The Army also has an environmental mission to sustain the environment to enable the Army mission and secure the future.

The state mission provides for the protection of life and property and to preserve peace, order, and public safety under the competent orders of the state governor. The WAARNG is headquartered at Camp Murray. It is comprised of four major units: the 81st Armor Brigade Combat Team based in Seattle; the 96th Troop Command based at Boeing Field; the 66th Theater Aviation Command based at Joint Base Lewis-McChord; and the 205th Regiment (Leadership) based in Yakima. The Joint Force Headquarters provides command and control as well as direct support activities for domestic and federal missions. Altogether, the WAARNG has a strength of approximately 5,900 soldiers and is comprised of various specialties including Infantry, Armor, Cavalry, Artillery, Aviation, Engineering, Logistics, Military Intelligence, Maintenance, Chemical, and Special Forces. The WAARNG maintains a multi-functional Homeland Response Force (HRF) readily available to deploy anywhere within the United States in support of Domestic Operations. There are five Field Maintenance Shops (FMSs), two Army Aviation Support Facilities (AASFs), three Maneuver Area Training Equipment Site (MATES), and one Unit Training and Equipment Site (UTES). In total, there are 40 individual sites and training installations that support this mission by providing training locales, maintaining and storing equipment and weapons, and housing WAARNG staff. These installations are listed in **Table D-1**. Locations of WAARNG sites and training installations are shown in **Figure D-1**.

Table D-1. WAARNG Sites and Training Installations

Code	Installation	Address	Acreage	County	USGS Quadrangle
53A10	Anacortes RC	22019 M Avenue, Anacortes, WA 98221-0567	4	Skagit	Anacortes North
53A15	Bellingham RC	426 A Street SE, Ephrata, WA	6	Grant	Ferndale
53A25	Bremerton RC	1211 Carver St., Bremerton, WA 98312-4357	0.2	Kitsap	Bremerton West
53A27	Buckley RC	455 N River Rd., Buckley, WA 98321-9535	10	Pierce	Buckley
53555	Camp Murray RC	33 Division Way, Camp Murray, WA 98430	240	Pierce	Fort Lewis
53735	Camp Seven Mile	Camp Seven Mile, WA 99026	328	Spokane	Airway Heights
53A35	Centralia RC	309 Byrd Street, Centralia, WA	8	Lewis	Centralia
53A57	Ephrata RC	426 A Street SE, Ephrata, WA	13	Grant	Ephrata
53A60	Everett RC*	2730 Oakes Avenue, Everett, WA	1	Snohomish	Everett
53A63	Grandview RC	800 Wallace Way Grandview, WA	11	Yakima	Grandview

Code	Installation	Address	Acreage	County	USGS Quadrangle
53B65	JBLM Gray Army Airfield RC	Bldg. 3106, 2 nd Division Drive, JBLM WA 98433	1.9	Pierce	Fort Lewis
53B77	JBLM Log Center/UTES	9608 N L St., Fort Lewis, WA	0.6	Pierce	Fort Lewis
	JBLM 66 th Aviation RC	Bldg. 6224, JBLM, WA 98433	25.8	Pierce	Fort Lewis
53444	Kennewick Storefront	2515 W Falls Avenue, Kennewick, WA 99336	0.1	Benton	Kennewick
53743	Kent RC	24410 MILITARY RD, Kent WA 98032-4110	15	King	Des Moines
53R30	Lacey Storefront	8221 Martin Way E, Suite F, Lacey WA 98133	0.1	Thurston	Lacey
53R20	Lakewood Storefront	10020 Bridgeport Way SW, Lakewood WA 98498	0.1	Pierce	Steilacoom
53073	Lynnwood Storefront	3333 184th Street SW, Lynnwood, WA 98037	0.1	Snohomish	Edmonds East
53A70	Longview RC	819 Vandercook Way, Longview WA	4	Cowlitz	Kelso
53132	Marysville AFRC	13613 40 th Ave NE, Marysville, WA	1.6	Snohomish	Marysville
53A75	Montesano RC	21 N Clemons Road, Montesano WA	14	Grays Harbor	Central Park
53A77	Moses Lake RC	6500 32nd Avenue, Moses Lake WA	10	Grant	Moses Lake North
53A80	Okanogan RC*	71 Rodeo Trail, Okanogan, WA, 98840-8227	4	Okanogan	Okanogan
53A85	Olympia RC	515 Eastside St SE, Olympia WA	2	Thurston	Olympia
53A90	Pasco RC	127 West Clark Street Pasco, WA 99301	1	Franklin	Pasco
53B00	Port Orchard RC	1950 Mile Hill Drive, Port Orchard WA	9	Kitsap	Bremerton East
53B10	Pullman	533 E Main Street, Pullman WA	1	Whitman	Pullman
53B15	Puyallup RC & Maintenance Shop	622 4th Ave SE, Puyallup, WA	2	Pierce	Puyallup
53R01	Puyallup Storefront	10228 156th Street E, Suite 109, Puyallup, WA 98374	<0.1	Pierce	Frederickson
53755	Redmond RC	17230 NE 95th St, Redmond, WA 98052	11	King	Redmond
53B25	Seattle Pier 91 RC	1601 W Armory Way, Seattle, WA	16	King	Shilshole Bay
53130	Seattle Boeing Field RC	6736 Ellis Ave. S, Seattle, WA 98108-3597	7.5	King	Seattle South
53R60	Seattle Storefront	2445 4 th Ave S, Suite 104-106, Seattle WA	0.1	King	Seattle South
53B27	Sedro-Woolley FMS3	24826 Thompson Dr., Sedro-Woolley, WA 98284	10	Skagit	Sedro-Woolley North
53B35	Snohomish RC	1501 Avenue D, Snohomish, WA	1	Snohomish	Snohomish

Code	Installation	Address	Acreage	County	USGS Quadrangle
53B60	Spokane Fairchild AFB	2 Taxiway J Rd, FAFB, WA 99011	0.4	Spokane	Deep Creek
53390	Spokane Fairchild AFRC	Bldg 4400, FAFB, WA 99011	1	Spokane	Deep Creek
53B55	Spokane Geiger Field RC	8700 W Electric Ave., Spokane, WA 99219-9038	20.4	Spokane	Four Lakes
53391	Spokane New RC	1626 N Rebecca St., Spokane WA 99217	6	Spokane	Spokane NE
53716	Spokane Storefront	1402 A North Division Street, Spokane, WA 98902	0.1	Spokane	Spokane NW
53R02	Spokane Storefront Valley Mall	14700 E Indiana, Suite 1142, Spokane WA 99216	<0.1	Spokane	Greenacres
53229	Vancouver AFRC	15005 NE 65th ST, Vancouver, WA 98682	1.4	Clark	Orchards
53R90	Vancouver Storefront	3200 SE 164 th Avenue Suite 214, Vancouver, WA 98683	<0.1	Clark	Vancouver
53B95	Walla Walla RC	113 S Colville Street, Walla Walla, WA	1	Walla Walla	Walla Walla
53965	Wenatchee USARC	1230 5th Street, Wenatchee, WA	2	Chelan	Wenatchee
53C00	Wenatchee RC	1230 5th Street, Wenatchee, WA	5	Chelan	Wenatchee
53C15	YTC RC/870, AFRC, MATES Complexes, CHP/T271	1211 Firing Center Road, Yakima, WA 98901	110	Yakima	Pomona
53C30	Yakima Airport RC	2501 Airport Lane, Yakima, WA 98903	9.9	Yakima	Yakima West
53C08	Yakima USMCR RC	1702 Tahoma Ave., Yakima, WA	4.9	Yakima	Yakima West

*Inactive Readiness Centers

The following sections provide brief descriptions of the infrastructure at each WAARNG site and training installation, and summaries of the status of Section 110 inventories and evaluations completed for each. **Appendix C** provides historic context information. Information on known cultural resources and cultural resources investigations has been entered into the ICRMP database or WAARNG geodatabase for each site and training installation.

D.1 Camp Murray Training Installation (53555)

Camp Murray is located in west-central Washington in Pierce County, about 10 miles south of Tacoma. This 240-ac installation is the state headquarters of Washington Military Department and is shared between the Washington State Emergency Management Division, the Washington Air National Guard (WAANG), and the Washington Army National Guard (WAARNG). At present, the installation is approximately 56% built environment and 44% natural environment. The built environment consists of a readiness center, maintenance building, and administrative buildings. No live fire training occurs at Camp Murray.



Figure D-1. Map of WAARNG Virtual Installation Showing WAARNG Sites and Training Installations

Camp Murray is bounded by a security fence and American Lake. It is separated from the adjacent Joint Base Lewis-McChord (JBLM) by Interstate 5 (I-5) to the east, and by the fenceline to the south. The natural environment within Camp Murray includes an open Oregon white oak forest that transitions into a coniferous forest of mostly Douglas-fir toward American Lake. The coniferous forest blends into a deciduous forest that is composed of cottonwood and willows. Murray Creek, a perennial stream, flows from JBLM through Camp Murray and drains into American Lake. The natural areas also include a shoreline adjacent to American Lake and wetlands mostly associated with Murray Creek and American Lake. The built environment consists of numerous buildings, a variety of structures, paved driveways, roads, landscaped lawns, trails, train tracks, and parking areas.

Cultural Resources Summary

There are 240 acre(s) at this site, of which 110 acre(s) had been surveyed for archaeological resources.

Fourteen archaeological site(s) had been located, of which two (45P1720, 45P1721) were determined eligible for listing in the NRHP.

Of the 92 building(s) and structure(s) at this site, 27 buildings/structures are 50 years old or older.

All 27 building(s) and structure(s) that are more than 50 years old had been evaluated. Of these 27, seven (Buildings 1, 2, 7, 23, 24, 26, 118) had been determined eligible for NRHP listing. Building 118 (The Adjutant General's Residence), the headquarters of the Washington Air National Guard, has already been listed in the NRHP.

Only one building (Bldg. 35) will turn 50 years old over the life of this ICRMP (2014).

This site had been surveyed to determine whether it includes a historic district / historic landscape. This site includes a historic district / historic landscape.

This site does/does not lie within a local historic district.

Tribes have not been consulted regarding the existence of sacred sites and/or traditional cultural properties. There are no known resources of traditional, cultural, or religious significance that might be part of a larger cultural landscape.

This site contains no cemeteries.

D.2 Camp Seven Mile Training Installation (53735)

Camp Seven Mile is a 328-acre military reservation located near the City of Spokane in Spokane County, Washington. The installation lies adjacent to the west side of the Spokane River, just downstream from the Nine Mile Reservoir in the vicinity of Riverside State Park. All of Camp Seven Mile consists of federally-owned land that has been licensed to the state and managed by Washington Army National Guard (WAARNG) for military training purposes. Camp Seven Mile is used for light maneuver training by the WAARNG and other users. It is also used for permitted recreational purposes. The site has about 5% built environment consisting of unpaved roads and trails, built earthen berms and a water tower for CCC camp (Structure # 7M-5). The remaining 95% is natural environment that includes a diversity of forests and large open grass areas. Historically, the area was used as a Civilian Conservation Corps (CCC) camp from 1933 until 1942. The Air Force once conducted training at Camp Seven Mile, and it is currently used for WAARNG training. Evidence of all three periods of use can be observed throughout the camp (e²M 2005a).

Cultural Resources Summary

There are 328 acre(s) at this training installation, of which 328 acre(s) had been surveyed for archaeological resources in 2004-2005. No further archaeological assessment is needed.

Seven archaeological site(s) have been located, of which four are either eligible or need further evaluation to make a determination of eligibility for listing in the NRHP.

There are no buildings at this installation. One structure (7M-5) that was identified during the 2004-2005 survey was determined eligible for listing to the NRHP.

This training installation had been surveyed to determine whether it includes a historic district / historic landscape. This training installation does not include a historic district / historic landscape.

Tribes had not been consulted regarding the existence of sacred sites and/or traditional cultural properties that might be part of a larger cultural landscape. There are no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape.

This training installation contains no cemeteries.

D.3 Readiness Centers (Armories)

An RC supports individual and collective training, administration, automation and communications, and logistical requirements for the WAARNG. The RC is the single gathering point for WAARNG personnel and is a mobilization platform during federal and state activation of WAARNG troops. The building serves as a headquarters for Table of Organization and Equipment (TOE) and Table of Distribution and Allowance (TDA) organizations and provides support to the community. Functional areas included in this

single category are assembly space, classrooms, distributive learning centers, locker rooms, physical fitness areas, kitchen, weapons and protective masks storage, other storage, enclosed areas to support training with simulation, operator level maintenance on assigned equipment, and use of Nuclear, Biological, and Chemical (NBC) equipment.

There are 38 RCs located throughout the WAARNG virtual installation. The RCs, in general, consist of an armory building, parking lot(s), sidewalks, driveways, and a small maintained lawn. Other buildings present within an RC can include Military Vehicle Storage Buildings (MVSBs), Field Maintenance Shops (FMS), and various storage structures. Most RCs are located on lots less than five acres.

Table D-2. WAARNG Readiness Centers/Armories

Code	Installation	Section 110 Inventory Status & Results
53A10	Anacortes RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53A15	Bellingham RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53A25	Bremerton RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53A27	Buckley RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53555	Camp Murray RC	Inventoried by 100% pedestrian survey; not NRHP-eligible building
53A35	Centralia RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; NRHP-eligible building
53A57	Ephrata RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
Sno53A60	Everett RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53A63	Grandview RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53B65	JBLM Gray Army Airfield RC	JBLM had been surveyed and Tribes consulted for sacred sites and traditional cultural properties. Consultation with JBLM CRM required prior to any undertaking. Not NRHP-eligible building.
TBD	JBLM 66 th Aviation RC	JBLM had been surveyed and Tribes consulted for sacred sites and traditional cultural properties. Consultation with JBLM CRM required prior to any undertaking. Not NRHP-eligible building.
53743	Kent RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53A70	Longview RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; NRHP-eligible building
53132	Marysville AFRC	License recently acquired; not NRHP-eligible building being newly built by US Army Reserve.
53A75	Montesano RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53A77	Moses Lake RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53A80	Okanogan RC	Inventoried by 100% pedestrian survey
53A85	Olympia RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; NRHP-eligible building
53A90	Pasco RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; not NRHP-eligible building
53B00	Port Orchard RC	Inventoried by 100% pedestrian survey; ; not NRHP-eligible building
53B10	Pullman RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53B15	Puyallup RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously

Code	Installation	Section 110 Inventory Status & Results
		recorded sites found; low potential for archaeological resources; NRHP-eligible building
53755	Redmond RC	Completed through archaeological sensitivity assessment in 2004-2005; low potential for archaeological resources; NRHP-eligible building
53B25	Seattle Pier 91 RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53130	Seattle Boeing Field RC	License recently acquired; not NRHP-eligible building
53B35	Snohomish RC	Inventoried by 100% pedestrian survey; NRHP-eligible building
53390	Spokane Fairchild AFRC	License recently acquired; not NRHP-eligible building
53B55	Spokane Geiger Field RC	Considered to retain low potential for archaeological resources; not NRHP-eligible building
53391	Spokane New RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53B75	Tacoma RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; NRHP-eligible building and listed in local register
53229	Vancouver AFRC	License recently acquired; not NRHP-eligible building
53B95	Walla Walla RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; NRHP-eligible building
53965	Wenatchee USARC/RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53C00	Wenatchee RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53C15	YTC (AFRC, RC/870)	Five cultural resources surveys have been found for YTC lands. Archaeological record survey/site file check completed. Low potential for archaeological resources in areas currently occupied by WAARNG.
53C30	Yakima Airport RC	Completed through reconnaissance survey/site file checks in 2004-2005; no new or previously recorded sites found; low potential for archaeological resources; not NRHP-eligible building
53C08	Yakima USMCR RC	Estimated probability for archaeological resources completed. Considered to retain high potential for archaeological resources. Archaeological survey needed prior to any undertaking. Not NRHP-eligible building

D.4 Field Maintenance Shops (FMS) and Combined Support Maintenance Shop (CSMS)

A) Field Maintenance Shops (FMSs)

FMSs are facilities where repairs of wheeled vehicles, generators and similar equipment take place.

7. Seattle FMS #1

FMS 1 is located in west-central Washington on 16 acres of land (together with a readiness center) in downtown Seattle on the waterfront pier area. The surrounding properties are commercial or industrial zoned. The built environment comprises approximately 90% of the acreage and consists of driveways, parking areas, and 8 buildings--the readiness center, FMS 6, break/lunch room, 2 FMS storage buildings, an FMS storage shed, a hazardous material storage building, and an FMS flammable storage building. The remaining acreage is open lawn and grass.

8. Ephrata FMS #2

Ephrata FMS 2 is located in central Washington on 13 acres of land together with a readiness center. The built environment (95%) in this installation consists of a readiness center, flammable material storehouse, two FMS, a storage facility, driveways, and parking areas. The remaining 5% of the area is open lawn/grass. All six buildings that include the two FMS buildings are not more than 50 years old and will not turn 50 years old over the life of this ICRMP.

9. Sedro Woolley FMS #3

FMS 3, Sedro Woolley, is located in northwestern Washington on 10 acres of land. The built environment consists of one FMS building, one hazmat storage building, paved driveways, and parking. Both buildings are not over 50 years old and will not turn 50 years old over the life of this ICRMP.

10. Montesano FMS #4

Montesano FMS 4 is co-located with a readiness center on 14 acres of land in western Washington. The built environment consists of a readiness center, FMS, flammable material storehouse, driveways, and parking areas. All four buildings in this installation are not over 50 years old and will not turn 50 years old over the life of this ICRMP.

11. Fort George Wright #5 (closed) – moved to Fairchild AFB to a new facility

FMS #5 was formerly located at Fort George Wright and recently moved to WAARNG's leased facility at Fairchild Air Force Base. The new FMS #5 building occupies about 16, 800 sq ft. The building was built in 2010.

Cultural Resources Summary

All five FMSs are located in a total combined area of about 54 acre(s), of which all accessible areas had been surveyed for archaeological resources in 2004-2005. No further archaeological assessment is needed.

No archaeological site(s) have been located in any of these facilities.

No buildings in these facilities are more than 50 years old and none will turn 50 years old over the life of this ICRMP.

These facilities had been surveyed to determine whether it includes a historic district / historic landscape. These facilities do not include a historic district / historic landscape.

Tribes had not been consulted regarding the existence of sacred sites and/or traditional cultural properties that might be part of a larger cultural landscape. There are no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape in these facilities.

These facilities contain no cemeteries.

B) Combined Support Maintenance Shops

The old CSMS Compound at Camp Murray is used for maintenance of Army vehicles and equipment. Hazardous waste, hazardous material, and parts storage buildings also exist onsite, along with office and employee recreational and locker areas.

Building 31. Building 31 at Camp Murray with an area of 25,337 square feet, is the primary maintenance building located in the CSMS Compound. It is used for vehicle maintenance and associated activities. These include a machine shop, an arms storage cage, a radiation room for radioactive equipment repair, an electronics shop, compressed gases storage, a laser inspection area, staff offices, and employee break rooms. Building 31 was reportedly built in approximately 1948, and has been used for similar purposes since that time. There is also a vehicle wash rack located outside the west side of Building 31. An oil-water separator on that side of the building receives drainage from the wash rack.

Buildings 31A, 31B, and 31C. These smaller buildings are adjacent to Building 31. According to operator interviews, Building 31A was used in the past as a vehicle maintenance building, including a paint booth, a machine shop, and an engine rebuild area. The building was closed and the interior was not accessed during the site visit as part of this assessment. Building 31B and 31C, each

with an area of 1,344 square feet, are of relatively recent construction – approximately 10 years old. Building 31B is an employee recreational space, and Building 31C contains employee lockers.

Building 30. According to operator interviews, Building 30, located to the southwest of Building 31, was previously used for parts storage, and is mostly used for office space now.

Buildings 37 and 37A. Building 37A, with an area of 854 square feet, is a covered building that is open on one side. The floor is a below-grade concrete berm with grating at floor level. Building 37, with an area of 448 square feet, was reportedly the original hazardous materials storage building, until approximately 1994 or 1995. Since that time, it has been used as dry storage for tools and equipment. These buildings are located to the south of Building 31.

Building 29. Building 29 contains two paint booths, one of which is large enough for vehicles to be driven into. The building contains steel shelving used for storing painting supplies, paint, and spray paint cans (some partially used). A small room on the northwest side of the building is labeled “Satellite Accumulation Point,” and the entrance is covered by a plastic curtain. The room contains several flammables cabinets, as well as 55-gallon drums containing paint waste. A tank previously used as a radiator dip tank is located at the southeast corner inside the building. Also to the northwest of Building 29, and just southwest of the drywell location, a septic tank is believed to be buried. During the site walk, Todd Nestegard of Camp Murray indicated the possible presence of an underground pipe that may be connected to the catch basin on the northeast corner of the building. The pipe is possibly perforated. There is a radio antenna tower located outside Building 29 on the south side. This antenna tower is no longer in use, according to Mr. Nestegard.

Building 27. Building 27 is used for hazardous material storage. The southeastern corner of the building is separated from the main hazardous material storage area of the building by a covered garage, and is used as a hazardous waste storage area. The floor is concrete slab, and the storage area appeared clean and well-maintained.

Building 28. Building 28 is used for vehicle oil changes and related maintenance. The floor is concrete slab, and the building is divided by interior walls into vehicle bays, a small office, and a two-level storage area. Stairs on the western side lead up to a partial second level storage area. There is a small, three-sided shed located on the southeast side of building 28. An empty concrete-bermed structure containing a drain was also located to the southeast of Building 28. A power washer was located next to this bermed structure.

The old CSMS facility is serviced by Puget Sound Energy (natural gas and electricity) and JBLM (sanitary sewer and water).

All buildings inside the old CSMS compound will be demolished once the hazardous materials clean-up at the site has been completed, approximately before mid-FY 2014. A new Pierce County Readiness Center (PCRC) and Joint Force Headquarters (JFHQ) will be built at this site beginning in FY 2014. A new CSMS at JBLM had been completed in early 2013.

Cultural Resources Summary

The old CSMS occupies a total of 10 acre(s) at Camp Murray training installation, of which all accessible areas had been surveyed for archaeological resources in 2004-2005. No further archaeological assessment is needed.

No archaeological site(s) have been located.

Three large maintenance buildings (Buildings 28, 29, and 31) are located on CSMS compound, along with several associated support buildings (Buildings 27, 30, 31 A to C, 37A). Five of these buildings are over 50 years old and had been determined not eligible for NRHP listing. None of the other buildings are turning 50 over the life of this ICRMP.

This facility had been surveyed to determine whether it includes a historic district / historic landscape. This facility does not include a historic district / historic landscape.

Tribes had not been consulted regarding the existence of sacred sites and/or traditional cultural properties that might be part of a larger cultural landscape. There are no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape in this facility.

This facility contains no cemeteries.

D.5 Unit Training and Equipment Site (UTES) and Mobilization and Training Equipment Site (MATES)

A) UTES

A **Unit Training Equipment Site (UTES)** is a consolidation of ARNG organizational equipment at or in close proximity to and serving an authorized weekend training site. WAARNG's UTES is located at JBLM. Currently, there are two buildings at the UTES facility: Bldgs. 9608 and 9902. The total area occupied by the UTES facility is 0.6 acre.

Cultural Resources Summary

One of the UTES building (#9608) built in 1989 is the maintenance shop. The other building (9609) is a flammable storage house built in 1989.

No buildings are 50 years old or older and they do not need evaluation for NRHP Eligibility until 2039.

B) MATES

A **Mobilization and Training Equipment Site (MATES)** is a site at which a portion of a WAARNG unit's authorized equipment is positioned and maintained to support unit mobilization and training.

WAARNG has two MATES complexes, both are located at the Yakima Training Center. The old MATES consists of Buildings 846, 870, 871, 872, 873, 947, 948, 949, 951 and 953. The new MATES consists of Buildings 856, 960 and 963.

Cultural Resources Summary

Both MATES complexes at YTC occupy a combined area of 110 acre(s), all of which had been previously surveyed by YTC for archaeological resources. No further archaeological assessment is needed.

No archaeological site(s) have been located during the surveys.

None of these buildings are >50 years old and none will turn 50 years old over the life of this ICRMP.

These facilities had been surveyed to determine whether it includes a historic district / historic landscape. These facilities do not include a historic district / historic landscape.

Tribes had been consulted by YTC regarding the existence of sacred sites and/or traditional cultural properties that might be part of a larger cultural landscape. There are no known resources of traditional, religious, or cultural significance that might be part of a larger cultural landscape in these MATES facilities.

MATES facilities do not contain cemeteries.

APPENDIX E

ICRMP DISTRIBUTION LIST AND POINTS OF CONTACT

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List of Washington State and Out of State Tribes for ICRMP Consult

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List of Washington State and Out of State Tribes for ICRMP Consult (cont.)

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APPENDIX F
ANNUAL UPDATES

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ICRMP ANNUAL REPORT FY 13

To: Ms. Stephanie Webber, NGB Cultural Resource Program

From: Rowena Valencia-Gica, Ph.D., WAARNG Natural and Cultural Resources Program

Subject: WAARNG Annual Report on Implementation Status of the WAARNG ICRMP and Cultural Resource Management Program.

Date: 15 November 2013

Reporting Period: 01 October 2012 – 30 September 2013
(*Period report covers, i.e. 1 May 06 – 1 May 07.*)

Program Overview: (*Short Paragraph covering major accomplishments, actions and any potential problems both current and foreseeable.*)

During FFY 2013, the WAARNG has successfully implemented 36 (on-going, contracted, or completed) construction and maintenance projects to preserve, improve, rehabilitate or protect several NRHP-eligible historic properties/structures, or projects that involved ground disturbance, new construction, or demolition (See Table 1).

Some of the major construction projects that were/are being implemented include the construction of the 66th Aviation Readiness Center, the new Combined Support Maintenance Shop (CSMS) at Joint Base Lewis-McChord (JBLM), Information/Operation Readiness Center at JBLM, and New Main Gate at Camp Murray. Major construction projects planned for implementation include the TUAS storage building at YTC, Barracks/DFAC at YTC, Pierce County Readiness Center at Camp Murray, and Thurston County Readiness Center at Olympia (See Table 2). Some of the demolition projects for FFY 2013-2014 are the deconstruction of the old CSMS at Camp Murray, Bldgs. 10, 11, 32B, 35 and 38 at Camp Murray, and Bldg. 500 at Kent.

BRAC actions have resulted in the divestiture of the Tacoma Armory. Tacoma Armory has been listed in the Tacoma City Register of Historic Places. SHPO and Tacoma City HPO consultations were conducted regarding the impact of divestiture action. SHPO referred the WAARNG's/WMD's CRM to pursue the discussion with the Tacoma City HPO. The TCHPO concurred with WMD's plan to sell the property.

Projects and Their Status for Reporting Period: (*List all projects: proposed, those completed during, and on-going. If a table is already available, paste in or submit as separate sheet and reference here.*)

For FY13, four projects related to cultural resources were implemented by the Environmental Program: (1) Historic Structures Evaluation Report for WAARNG Buildings that Turned 50 in 2008-2011, (2) Collections Assessment and Rehabilitation for WAARNG Cultural Resources Collections in Bldg. 2 Museum, (3) Design and Print Brochures, Signage and Posters for Natural and Cultural Resources, and (4) Photography of WAARNG's Natural and Cultural Resources.

The list of CFMO projects related to the preservation, improvement, rehabilitation or protection of several NRHP-eligible historic properties/structures, or projects that involve ground disturbance and new construction are presented in the table below.

Table 1. Completed or On-going CFMO Projects Related to Cultural Resources

Brief Project Description	Location	Status
Preserve/Improve Historic Structures:		
Roof coating	Puyallup RC	Completed
Museum Interior Improvements	Bldg. 2, Camp Murray	Completed
Roof replacement	Longview	Completed
Roof repair	Snohomish	Completed
Demolition:		
Bldg. 10	Camp Murray	Completed
Bldg. 11	Camp Murray	Completed
Bldg. 500	Kent	Completed
Bldgs. 32B, 35, 38	Camp Murray	Completed
Ground Disturbance:		
Road pavement/improvements	Camp Murray	Completed
~5 ac UTES parking gravel paving	JBLM	Completed
Storage building	B Company, YTC	Completed
Storage building	Montesano FMS/RC	Completed
Storage building	Montesano FMS	Completed
Const Loading Ramp	Montesano FMS/RC	Completed
Hemmett Parking Pad	Bldg. 3106, JBLM	Completed
Hemmett Parking Pad	YTC	Completed
Hemmett Parking Pad/groundwater	Montesano FMS	Completed
FMS canopy	Ephrata	Completed
Storage building	Grandview RC	Completed
Storage building	Port Orchard	Completed
Storage building	Centralia	Completed
Storage building 1 & 2	Kent	Completed
Storage building	Wenatchee	Completed
Storage building	Camp Murray	Completed
Storage building 951	MATES, YTC	Completed
Entrance Gate Mitigations	Camp Murray	Completed
Storage building #34A	Camp Murray	Completed
Storage building #1	YTC	Design
Simulator building #2	YTC	Design
Storage building #3	MATES, YTC	Design
Building 104 parking	Camp Murray	Funds Pending
Storage building #39	Camp Murray	In Contract
MVP Gravel Resurfacing	8.5 Ac YTC	Completed
Water line repair/replace	Camp Murray	On-going
Storm Drainage Improvements	YTC	On-going
New Major Construction:		
66 th Aviation RC	Ft. Lewis	Completed
CSMS	JBLM	Completed
I/O RC	JBLM	On-going
New main gate	Camp Murray	Completed

Projects Proposed for Next Reporting Period: *(List all projects in STEP or at least planned to be entered into STEP for the next reporting period that is known at the time of the report writing. If a table is already available, paste in or submit as a separate sheet and reference here.)*

Three projects are planned to continue for implementation in the next reporting period: (1) Collections Assessment and Rehabilitation for WAARNG Cultural Resources Collections in Bldg. 2 Museum, (2) Design and Print Brochures, Signage and Posters for Natural and Cultural Resources, and (3) Historic Structures Evaluation Report for WAARNG Buildings that Turned 50.

Planned CFMO projects with potential cultural resources impacts are shown below.

Table 2. Planned CFMO Projects Related to Cultural Resources

Brief Project Description	Location	Status
Demolition:		
Demolition CSMS	Camp Murray	FY13-14
New Major Construction:		
TUAS Hangar/Aircraft Storage building	YTC	TBD
YTC Barracks		FY 13-14
TUAS Other Infrastructure	YTC	TBD
Pierce County Readiness Center	Camp Murray	FY 14-15
Thurston County Readiness Center	Olympia	FY 17

ICRMP ANNUAL REPORT FY 12

To: Ms. Stephanie Webber, NGB Cultural Resource Program

From: Rowena Valencia-Gica, Ph.D., WAARNG Natural and Cultural Resources Program

Subject: WAARNG Annual Report on Implementation Status of the WAARNG ICRMP and Cultural Resource Management Program.

Date: 15 November 2012

Reporting Period: 01 October 2011 – 30 September 2012
(*Period report covers, i.e. 1 May 06 – 1 May 07.*)

Program Overview: (*Short Paragraph covering major accomplishments, actions and any potential problems both current and foreseeable.*)

During FFY 2012, the WAARNG has successfully implemented 38 (on-going, contracting/design phase, or completed) construction and maintenance projects to preserve, improve, rehabilitate or protect several NRHP-eligible historic properties/structures, or projects that involved ground disturbance, new construction, or demolition.

Some of the major construction projects that were/are being implemented include the construction of the 66th Aviation Readiness Center, the new Combined Support Maintenance Shop (CSMS) at Joint Base Lewis-McChord (JBLM), Information/Operation Readiness Center at JBLM, new main gate at Camp Murray, and Barracks/DFAC at YTC. Major construction projects planned for implementation include the TUAS storage building at YTC as well as the Thurston County Readiness Center in FY 17. The only demolition project planned for FFY 2013 is the deconstruction of the old CSMS.

BRAC actions have resulted in the divestiture of the Tacoma Armory. Tacoma Armory has been listed in the Tacoma Register of Historic Places in Washington state. Informal SHPO consultation was conducted regarding the impact of divestiture action. The SHPO referred the WAARNG to the City of Tacoma to discuss about the proposed action due to the fact that the armory was listed under the City's register. Discussion with the City of Tacoma is on-going.

Projects and Their Status for Reporting Period: (*List all projects: proposed, those completed during, and on-going. If a table is already available, paste in or submit as separate sheet and reference here.*)

For FY12, the only environmental programs project related to cultural resources is the Collections Assessment and Rehabilitation for WAARNG Cultural Resources Collections in Bldg. 2 Museum. Another project, preparation of the NHPA Maintenance and Treatment Plans for WAARNG's Historic Structures, has been a STEP approved project for FY 13 implementation.

The list of CFMO projects related to the preservation, improvement, rehabilitation or protection of several NRHP-eligible historic properties/structures, or projects that involve ground disturbance and new construction are presented in the table below.

Brief Project Description	Location	Status
Preserve/Improve Historic Structures		
Roof coating	Puyallup RC	Completed
Museum Interior Imp	Bldg 2, CM	Completed
Roof Replacement	Longview	Completed
Roof Repair	Snohomish	Completed
Ground Disturbance		
Road pavement / Imp	Camp Murray	Completed
Bldg 10 Demolition	Camp Murray	Completed
Bldg 11 Demolition	Camp Murray	Completed
Bldg 500 Demolition	Kent	Completed
UTES Parking, 5 acres	JBLM	Completed
Storage Building	Ephrata	Completed
Storage Building	B Comp YTC	Completed
Storage Building	Montesano FMS	Completed
Storage Building	Montesano RC	Completed
Const loading ramp	Montesano FMS	Completed
Hemmett parking pad	Bldg 3106 JBLM	Completed
Hemmett parking pad	YTC	Completed
Hemmett parking pad	Montesano FMS	Completed
FMS canopy	Ephrata	Completed
Storage Building	Grandview RC	Completed
Storage Building	Port Orchard	Completed
Storage Building	Centralia	Completed
Storage Buildings 1&2	Kent	Completed
Storage Building	Wenatchee	Completed
Storage Building	Camp Murray	Completed
Storage Building #1	MATES YTC	Completed
Storage Building #34A	Camp Murray	Completed
Ent. Gate mitigations	Camp Murray	Completed
Storage Building	YTC	Completed
Storage Building #2	MATES YTC	Completed
Simulator Building	YTC	Completed
Storage Building	YTC 951	Completed
Building 104 Parking	Camp Murray	Completed
Storage Building #39	Camp Murray	Completed
MVP Gravel Resurfacing, 8.5 Ac	YTC	
New Major Construction:		
66 th Aviation RC	Ft. Lewis	Completed
CSMS	JBLM	On-going
I/O RC	JBLM	On-going
Camp Murray new main gate	Camp Murray	On-going

Projects Proposed for Next Reporting Period: *(List all projects in STEP or at least planned to be entered into STEP for the next reporting period that is known at the time of the report writing. If a table is already available, paste in or submit as a separate sheet and reference here.)*

At least 35 projects that will improve, rehabilitate or protect several NRHP-eligible historic properties/structures were proposed for budget request and implementation within the 2011-13 biennium.

Planned CFMO projects with potential cultural resources impacts are shown below.

Brief Project Description	Location	Status
Preserve/Improve Historic Structures		
Lighting replacement	Longview RC	Proposed
Lighting replacement	Snohomish RC	Proposed
Lighting replacement	Wenatchee Rc	Proposed
Lighting replacement	Olympia RC	Proposed
Re-roof	Centralia RC	Proposed
Re-roof & Ext painting Bldg 24	Camp Murray	Proposed
Ground Disturbance:		
Water Line Repair / Replace	Camp Murray	Proposed
Perimeter Trail Resurfacing	Camp Murray	Proposed
TUAS Hangar/Aircraft Storage building	YTC	FY12 or FY13
Demolition:		
Demolition CSMS	Camp Murray	FY13
New Major Construction:		
Barracks and DFAC	YTC	FY 14
TUAS and Other Infrastructure	YTC	FY14 (Pending approval of budget allocation)

Updated State Historic Preservation Office Contact Information: *(Enter Point of Contact and contact information.)*

State Historic Preservation Officer
Allyson Brooks, Ph.D.
email: Allyson.Brooks@dahp.wa.gov
(360) 586-3066
Overall Program Administration, Budget,
Environmental Review of Transportation Projects.

Deputy State Historic Preservation Officer
Greg Griffith
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(360) 586-3073
Comprehensive Planning, Environmental Project Review.

State Archaeologist
Rob Whitlam, Ph.D.
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(360) 586-3080
Archaeology, Environmental Review of Federal Projects
involving Archaeology,
Section 106 and EO-0505, Volunteer Opportunities in
Archaeology, Archaeology and Oil Spill Response.

State Physical Anthropologist
Guy Tasa, Ph.D.
email: Guy.tasa@dahp.wa.gov
(360) 586-3534
Human Remains Identification, Preservation,
Excavation, and Repatriation; RCW 27.44

State Architectural Historian
Michael Houser
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(360) 586-3076
NRHP, WA Heritage Register, Heritage Barn Register,
Washington State Advisory Council on Historic
Preservation, Assessing importance of historic property.

Certified Local Government & Survey Coordinator
Megan Duvall
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(360) 586-3074
Certified Local Government Programs, Certified Local
Government Grants, Historic Property Survey & Inventory

Assistant State Archaeologist
Stephenie Kramer
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(360) 586-3083
Archaeology, Native American Burial Excavation
Permits and Washington State Archaeological
Excavation Permits, Data Sharing Agreements for GIS, Rules Coordinator

Transportation Archaeologist
Matthew Sterner
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(360) 586-3082
Archaeology and Native American issues relating to
transportation projects.

Transportation Archaeologist
Lance Wollwage, Ph.D.
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Archaeology and Native American issues relating to transportation
projects.

Local Government Archaeologist
Gretchen Kaehler
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Archaeology and Native American issues
relating to local government projects.

Historical Architect
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Investment Tax Credit,
Environmental Review of Historic Buildings, Heritage Capital Grants

Preservation Design Reviewer
Russell Holter
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Historic Preservation Design Review and
Consultation, National Historic Preservation Act,
Section 106, training coordination.

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GIS Data Management, Site Records and
Inventory Research Management, and Public Records Officer.

GIS Cultural Resource Analyst
Morgan McLemore
email: Morgan.mclemore@dahp.wa.gov
(360) 586-3081
GIS Cartographer, issuance of Smithsonian
Trinomials.

Financial Manager
Loren Doolittle
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(360) 586-3072
Financial management, grants and budget

Resource Protection
Annie Strader
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(360) 586-3078
GIS Cartographer.

Cemetery Database Cartographer
Susan Goff
email: Susan.Goff@dahp.wa.gov
(360) 586-3071
Development of statewide cemetery database and program.

Administrative Assistant
Zee Hill
email: Zee.Hill@dahp.wa.gov
(360) 586-3077
Administrative Assistant to the Director,
Office Management, scheduling appointments to view records.

Updated Native American Contact Information: (Enter Point of Contact and contact information as applicable.)

CHEHALIS CONFEDERATED TRIBES

Chehalis Business Council
420 Howanut Road; PO Box 536
Oakville, WA 98568
Phone: (360) 273-5911/753-3213
Fax: (360) 273-5914
Website: www.chehalis-tribe.org
County: Grays Harbor/Thurston

COLVILLE CONFEDERATED TRIBES

Colville Business Council
PO Box 150
Nespelem, WA 99155
Phone: (509) 634-2200
Fax: (509) 634-4116
Website: www.colvilletribes.com
County: Okanogan/Ferry

COWLITZ INDIAN TRIBE

Cowlitz Tribal Council
1055 9th Avenue, Suite B
Longview, WA 98632
Phone: (360) 577-8140
Fax: (360) 577-7432
Website: www.cowlitz.org
County: Cowlitz/Clark

HOH TRIBE

Hoh Business Committee
P.O. Box 2196; 2464 Lower Hoh Rd
Forks, WA 98331
Phone: (360) 374-3271
Fax: (360) 374-6549
Website: www.hohtribe-nsn.org
County: Jefferson

JAMESTOWN S'KLALLAM TRIBE

Jamestown S'Klallam Tribal Council
1033 Old Blyn Highway
Sequim, WA 98382
Phone: (360) 683-1109
Fax: (360) 681-4643
Website: www.jamestowntribe.org
County: Clallam

KALISPEL TRIBE

Kalispel Business Committee
PO Box 39
Usk, WA 99180
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Fax: (509) 445-1705
Website: www.kalispeltribe.com
County: Pend Oreille

SQUAXIN ISLAND TRIBE

Squaxin Island Tribal Council
10 SE Squaxin Lane
Shelton, WA 98584
Phone: (360) 426-9781
Fax: (360) 426-6577
Website: www.squaxinisland.org
County: Mason/Thurston

STILLAGUAMISH TRIBE

Stillaguamish Board of Directors
PO Box 277
Arlington, WA 98223-0297
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Fax: (360) 659-3113
Website: www.stillaguamish.com
County: Snohomish

SUQUAMISH TRIBE

Suquamish Tribal Council
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Suquamish, WA 98392-0498
Phone: (360) 598-3311
Fax: (360) 598-3135
Website: www.suquamish.nsn.us
County: Kitsap

SWINOMISH TRIBE

Swinomish Indian Tribal Community
11404 Moorage Way
LaConner, WA 98257
Phone: (360) 466-3163
Fax: (360) 466-7363
Website: www.swinomish.org
County: Skagit

LOWER ELWHA KLALLAM TRIBE

Lower Elwha Business Council
2851 Lower Elwha Road
Port Angeles, WA 98363
Phone: (360) 452-8471
Fax: (360) 452-3428
Website: www.elwha.org
County: Clallam

LUMMI NATION

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2616 Kwina Road
Bellingham, WA 98226
Phone: (360) 384-1489
Fax: (360) 380-1850
Website: www.lummi-nsn.org
County: Whatcom

MAKAH TRIBE

Makah Tribal Council
PO Box 115
Neah Bay, WA 98357
Phone: (360) 645-2201
Fax: (360) 645-2788
Website: www.makah.com
County: Clallam

MUCKLESHOOT TRIBE

Muckleshoot Tribal Council
39015 172nd Avenue SE
Auburn, WA 98092
Phone: (253) 939-3311
Fax: (253) 939-5311
Website: www.muckleshoot.nsn.us
County: King

NISQUALLY TRIBE

Nisqually Tribal Council
4820 She-Nah-Num Drive SE
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County: Thurston

NOOKSACK TRIBE

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UPPER SKAGIT TRIBE

Upper Skagit Tribal Council
25944 Community Plaza
Sedro Woolley, WA 98284
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Fax: (360) 854-7004
Website: <http://upperskagit.nsovp.gov>
County: Skagit

YAKAMA NATION

Yakama Tribal Council
PO Box 151
Toppenish, WA 98948
Phone: (509) 865-5121
Fax: (509) 865-5528
Website: www.yakamanation-nsn.gov
County: Yakima/Klickitat

PORT GAMBLE S'KLALLAM TRIBE

Port Gamble S'Klallam Tribal Council
31912 Little Boston Road NE
Kingston, WA 98346
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Fax: (360) 297-7097
Website: www.pgst.nsn.us
County: Kitsap

PUYALLUP TRIBE

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County: Pierce

QUILEUTE TRIBE

Quileute Tribal Council
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La Push, WA 98350
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Fax: (360) 374-6311
Website: www.quileutenation.org
County: Clallam

QUINULT NATION

Quinault Tribal Council
PO Box 189
Taholah, WA 98587
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Fax: (360) 276-4191
Website: <http://209.206.175.157>
County: Grays Harbor/Jefferson

SAMISH NATION

Samish Indian Nation Tribal Council
PO Box 217; 2918 Commercial Ave
Anacortes, WA 98221
Phone: (360) 293-6404
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Website: www.samishtribe.nsn.us
County: Skagit

SAUK-SUIATLE TRIBE

Sauk-Suiattle Tribal Council
5318 Chief Brown Lane
Darrington, WA 98241
Phone: (360) 436-0131
Fax: (360) 436-1511
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County: Skagit

SHOALWATER BAY TRIBE

Shoalwater Bay Tribal Council
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Tokeland, WA 98590
Phone: (360) 267-6766
Fax: (360) 267-6778
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County: Pacific

SKOKOMISH TRIBE

Skokomish Tribal Council
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Shelton, WA 98584
Phone: (360) 426-4232
Fax: (360) 877-5943
Website: www.skokomish.org
County: Mason

SNOQUALMIE TRIBE

Snoqualmie Tribal Council
PO Box 969
Snoqualmie, WA 98065
Phone: (425) 888-6551
Fax: (425) 888-6727
Website: www.snoqualmienation.com
County: King

SPOKANE TRIBE

Spokane Tribal Business Council
PO Box 100
Wellpinit, WA 99040
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Fax: (509) 458-6575
Website: www.spokanetribe.com
County: Stevens/Spokane

Non-federally Recognized Indian Tribes

Note: Washington State does not have state-recognized tribes, as some states do. The following tribes are landless, non-federally recognized. Some are categorized as non-profit corporations; some are pending federal recognition. All have requested inclusion on this list.

CHINOOK TRIBE**

The Honorable Ray Gardner, Chair
Chinook Indian Tribe
PO Box 368; (3 E. Park St.)
Bay Center, WA 98527
Ph: 360/ 875-6670 Fax: 360/ 875-6680
Email: office@chinooknation.org
Website: www.chinooknation.org
County: Pacific

DUWAMISH TRIBE**

The Honorable Cecile Hansen, Chair
Duwamish Tribe
4705 West Marginal Way SW
Seattle, WA 98106
Ph: 206/431-1582 Fax: 206/ 431-1962
Email: dts@qwestoffice.net
Website: www.duwamishtribe.org
County: King

KIKIALLUS INDIAN NATION

Kurt Weinreich, Administrator
2103 Harrison #143
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County: King

MARIETTA BAND OF NOOKSACK TRIBE

The Honorable Robert Davis, Jr., Chair
Marietta Band of Nooksack Indians
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County: Whatcom

SNOHOMISH TRIBE

The Honorable Michael didahalqid Evans, Chair
Snohomish Tribe of Indians
11014-19th Ave SE, Suite #8/PMB #101
Everett, WA 98208-5121
Ph: 425/ 744-1855 Fax: 425/ 744-1971
Email: info@snohomishtribe.com
Website: <http://snohomishtribe.com>
County: Snohomish

SNOQUALMOO TRIBE

Earngy Sandstrom, Chair
Snoqualmo Tribe of Indians
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Bellingham, WA 98226
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Email: earngy@aol.com
County: Island

STEILACOOM TRIBE**

The Honorable Danny K. Marshall, Chair
Steilacoom Indian Tribe
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Email: fairviewwest@q.com
County: Pierce

***Pending Federal Recognition*

***Pending Federal Recognition*

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APPENDIX G

RESOURCE ESTIMATE “FOR OFFICIAL USE ONLY”

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APPENDIX H

CULTURAL RESOURCES LAWS AND REGULATIONS

AR 200-1 is available at: http://www.army.mil/usapa/epubs/pdf/r200_1.pdf

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Cultural Resources Laws and Regulations

Cultural resources are defined as historic properties in the NHPA; as cultural items in the NAGPRA; as archaeological resources in ARPA; as sacred sites (to which access is provided under the American Indian Religious Freedom Act of 1978 [AIRFA]) in EO 13007; and as collections and associated records in 36 *Code of Federal Regulations* (CFR) Part 79, *Curation of Federally Owned and Administered Collections*. Requirements set forth in NEPA, the NHPA, ARPA, NAGPRA, AIRFA, 36 CFR Part 79, EO 13007, EO 13175, and their implementing regulations, define the WAARNG's compliance responsibilities for management of cultural resources. AR 200-1 specifies Army policy for cultural resources management. The following list of federal statutes and regulations are applicable to the management of cultural resources at WAARNG sites.

H.1 Brief Overview

H.1.1 Federal Laws and Regulations

All federal laws, regulations, and major court decisions can be accessed online from Cornell University Law Library at <http://www.law.cornell.edu/>. All Army regulations, pamphlets, publications, and forms can be accessed online at: <http://aec.army.mil/usace/cultural/index/>. The WAARNG is not responsible for the content of referenced Web sites.

- **National Environmental Policy Act of 1969.** *NEPA sets forth a national policy that encourages and promotes productive harmony between humans and their environment. NEPA procedures require that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The NEPA process is intended to help public officials make decisions that are based on an understanding of environmental consequences and take actions that protect, restore, and enhance the environment. NEPA also provides opportunities for input from Tribes and the public into the decision-making process. Regulation 40 CFR 1500–1508 establishes the policy requirements that are binding on all federal agencies for implementing NEPA. Additional guidance on how to complete the NEPA process is provided in the NEPA Handbook developed by the NEPA Committee of the Environmental Advisory Council [GKO/ARNG/G-4/Conservation/NEPA/Guidance/2006 Version of NEPA Handbook]. This ICRMP is subject to NEPA analysis and documentation requirements. The Environmental Assessment (EA) and Finding of No Significant Impact (FNSI) prepared for the original ICRMP are considered to remain valid for the ICRMP Revision; therefore, additional NEPA review completed for the ICRMP Revision is restricted to an internal REC, provided with a copy of the FNSI for the original ICRMP; and review correspondence in **Appendix B**.*
- **National Historic Preservation Act of 1966, as amended.** *The NHPA establishes the federal government's policy to provide leadership in the preservation of historic properties and to administer federally owned or controlled historic properties in the spirit of stewardship. Regulation 36 CFR 800 sets forth the procedural requirements to identify, evaluate, and determine effects of all undertakings on historic properties.*
- **Curation of Federally Owned and Administered Archaeological Collections.** *Regulation 36 CFR Part 79 defines collections and sets forth the requirements for processing, maintaining, and curating archaeological collections. However, NAGPRA cultural items and human remains shall be managed in accordance with NAGPRA and 43 CFR 10.*
- **Antiquities Act of 1906.** *This act provides information on penalties for damage and destruction of antiquities.*
- **Archaeological Resources Protection Act of 1979.** *ARPA provides for the protection of archaeological resources and sites that are on public lands and American Indian lands and fosters increased cooperation and exchange of information.*

- **Archaeological and Historic Preservation Act of 1974 (AHPA).** This act provides for the preservation of historical and archaeological data, including relics and specimens.
- **Native American Graves Protection and Repatriation Act of 1990, as amended.** NAGPRA provides guidelines on the ownership or control of American Indian cultural items and human remains that are excavated or discovered on federal or tribal lands after 16 November 1990. 43 CFR 10 sets forth the requirements and procedures to carry out the provisions of NAGPRA.
- **American Indian Religious Freedom Act of 1978.** AIRFA provides for the protection and preservation of traditional religions of American Indians.
- **Presidential Memorandum dated 29 April 1994 – Government-to-Government Relations with Native American Tribal Governments.** This memorandum outlines the principles that executive departments and agencies are to follow in their interactions with American Indian tribal governments.
- **Executive Order 11593 – Protection and Enhancement of the Cultural Environment.** This EO orders the federal government to provide leadership in preserving, restoring, and maintaining the historic and cultural environment of the nation by initiating measures necessary to preserve, restore, and maintain (for the inspiration and benefit of the people) federally owned sites, structures, and objects of historical, architectural, or archaeological significance.
- **Executive Order 13006 – Locating Federal Facilities on Historic Properties in our Nation’s Central Cities.** This EO orders the federal government to utilize and maintain, wherever operationally appropriate and economically prudent, historic properties and districts, especially those located in central business areas.
- **Executive Order 13007 – Indian Sacred Sites.** This EO guides each executive branch agency on accommodating access to and ceremonial use of American Indian sacred sites by American Indian religious practitioners, and avoiding adversely affecting the physical integrity of such sacred sites.
- **Executive Order 13175 – Consultation and Coordination with Indian Tribal Governments.** This EO directs the federal government to establish regular and meaningful consultation and collaboration with tribal officials in the development of federal policies that have tribal implications, strengthen the United States government-to-government relationships with federally recognized tribes and Native Hawaiian organizations, and reduce the imposition of unfunded mandates upon such groups.

Executive Order 13287 – Preserve America. This EO directs the federal government to provide leadership in preserving America’s heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the federal government; promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties; inventorying resources; and promoting ecotourism.

Executive Order 13327 – Federal Real Property Asset Management. Expressing the goal of promoting efficient and economical use of real property assets and ensuring management accountability and reforms, EO 13327 requires federal agencies to develop and submit asset management plans, incorporating the management requirements for historic property found in EO 13287 (3 March 2003) and the environmental management requirements found in EO 13148 (21 April 2000). The new EO also establishes the Federal Real Property Council, which is tasked to consider environmental costs associated with ownership of property, including restoration and compliance costs.

Executive Order 13423 – Strengthening Federal Environmental, Energy, and Transportation Management. Expressing the goal of strengthening the environmental, energy, and transportation management of Federal agencies, EO 13423 requires Federal agencies to conduct their environmental, transportation, and energy-related activities under the law in support of their

respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner.

H.1.2 Department of Defense, Army and ARNG Guidance and Regulations

- **Department of Defense Instruction 4715.16 – Environmental Conservation Program.** This instruction implements policy, assigns responsibility, and prescribes procedures for the integrated management of natural and cultural resources on property under DoD control. This instruction is currently being revised; a draft of the revised instruction is anticipated in Fiscal Year (FY) 2008.
- **Department of Defense Instruction 4710.02 – DoD Interactions with Federally-Recognized Tribes.** This instruction implements DoD policy, assigns responsibilities, and provides procedures for DoD interactions with federally recognized tribes (hereafter referred to as “Tribes”) in accordance with DoD Directive 5134.01, DoD Directive 4715.1E, DoDI 4715.16, Secretary of Defense Policy dated October 20, 1998, EO 13175, and the Presidential Memorandum dated September 23, 1994.
- **32 CFR 651, Environmental Analysis of Army Actions.** This regulation sets forth policy, responsibilities, and procedures for integrating environmental considerations into Army planning and decision-making, thus implementing CEQ regulations. This regulation is used to prepare the EA to implement the ICRMP.
- **Army Regulation 200-1 – Environmental Protection and Enhancement.** This regulation covers environmental protection and enhancement and provides the framework for the Army Environmental Management System. This regulation addresses environmental responsibilities of all Army organizations and agencies. Chapter 6 regulation establishes the Army’s policy for managing cultural resources to meet legal compliance requirements and to support the military mission. AR 200-1 supersedes AR 200-1.
- **Department of Defense Minimum Antiterrorism Standards for Buildings (UFC 4-010-01).** These standards provide appropriate, implementable, and enforceable measures to establish a level of protection against terrorist attacks for all inhabited DoD buildings where no known threat of terrorist activity currently exists.
- **National Guard Bureau – ILE-T All States Letter (P02-0058) – Cultural Resources Management Policy Guidance.** This letter provides guidance for ICRMPs, annual update process, and templates for future ICRMPs. It also identifies nationwide goals for cultural resources programs.

H.1.3 Federal Memoranda, Program Comments, and Agreements

This section summarizes policy documents, memoranda, and agreements affecting the WAARNG at the national level.

- **World War II Temporary Buildings Programmatic Agreement (PA) (1986).** The 1986 PA on World War II-era temporary buildings addresses these standardized buildings as a class in evaluation and documentation. The PA prescribes when demolition may proceed without further action and when the SHPO shall review the undertaking. Specifically, the PA allows demolition without further consultation for World War II-era temporary buildings; projects involving renovation, repair, rehabilitation, or movement of these buildings remain undertakings that require consultation with the SHPO. As part of the implementation of this PA, the Historic American Building Survey (HABS) documented representative examples of World War II-era temporary buildings across the United States. The majority of representative examples selected for documentation occurred at three facilities: Fort McCoy in Wisconsin, Fort Drum in New York, and Camp Edwards in Massachusetts.
- **Draft Programmatic Agreement for ARNG Readiness Centers (scheduled for release in 2007).** The Draft PA for ARNG Readiness Centers, scheduled for release in 2007, applies to

both federally and state-owned Readiness Centers (previously designated as Armories) that are 50 years old or older, or that are considered eligible under NRHP criterion consideration G (Exceptional Significance). The terms of the Nationwide PA apply to ARNG undertakings concerning the maintenance and treatment, rehabilitation, renovation, and mothballing of Readiness Centers and associated structures and featured landscapes. The stipulations of the PA include a list of ARNG actions considered to be exempt from Section 106 review, a list of ARNG undertakings that could be completed with an expedited Section 106 review process, and procedures for undertakings not covered by the expedited review process. A national historic context document and a condition assessment of ARNG Readiness Centers were prepared as supporting documents for this PA.

- **Program Comment: DoD Cold War-Era Unaccompanied Personnel Housing (implemented May 2007).** DoD has developed a programmatic approach to NHPA Section 106 compliance associated with management of Unaccompanied Personnel Housing (UPH) through the Program Alternative allowed under 36 CFR 800.14. In the form of a Program Comment, is a one-time action that covers all management activities for DoD UPH built during the Cold War. The Program Comment issued by the ACHP will cover undertakings including ongoing operations; maintenance and repair; rehabilitation; renovation; mothballing; ceasing maintenance activities; new construction; demolition; deconstruction and salvage; and transfer, lease, sale and/or closure. The Proposed Action covers approximately 5,000 buildings and structures within the overall DoD inventory of 397,389 buildings and structures. A copy of the Program Comment is included in **Appendix I**. This Program Comment does NOT apply to UPH that are contributing elements to NRHP-eligible historic districts.

H.1.4 State and Local Laws and Regulations

The historic preservation laws in some states can be more restrictive than federal laws, and meeting the requirements of the state's regulations can require additional or more extensive compliance activities on the part of the agency conducting a federal undertaking (36 CFR 800.16[y]). States might also have cemetery laws to consider (for example, Arkansas Act 753 of 1991, as amended, makes it a class D felony offense to knowingly disturb a human grave). Readiness centers (armories) can be a contributing element or located within a historic district. Historic districts could have covenants or building codes. A list of certified local governments can be found at <http://www2.cr.nps.gov/clg/>.

In cases where a project is not a federal undertaking (36 CFR 800.16[y]) for which the WAARNG or another federal agency is responsible for compliance with NHPA or other requirements, compliance with state, local, city, county, or certified local government laws and regulations would be required. A common example of an action that generally does not involve compliance with federal regulations is an action such as maintenance, repairs, remodeling, or demolition of a historic building or land that is not owned or leased by the federal government, does not support a federal mission, and where no federal funding federal permit or other assistance is involved.

In cases where a project is a federal undertaking for which the WAARNG or another federal agency is responsible for compliance with NHPA or other requirements, both federal and state laws can apply. An example of this action is when the federal undertaking affects a historic property owned and managed by the state. Another example is if the action occurs on state-owned land, state permits for archaeological work on state land could be required.

Washington State Historic Preservation Laws include the following:

- [Executive Order 05-05](#)
(<http://www.dahp.wa.gov/sites/default/files/DAHP%20Executive%20Order%2005-05.pdf>) - This order requires that all state agencies with capital improvement projects to integrate the

Department of Archaeology and Historic Preservation (DAHP), the Governor's Office of Indian Affairs (GOIA), and concerned tribes into their capital project planning process.

- [Advisory Council on Historic Preservation \(WAC 25-12\)](#)
(<http://apps.leg.wa.gov/WAC/default.aspx?cite=25-12&full=true>) - The purpose of this chapter shall be to ensure compliance by the advisory council on historic preservation with the provisions of Chapter 1, Laws of 1973 (Chapter [42.17](#) RCW) in particular that portion dealing with public records.
- [Abandoned and Historic Cemeteries and Historic Graves \(RCW 68.60\)](#)
(<http://apps.leg.wa.gov/RCW/default.aspx?cite=68.60&full=true>) – This state law defines abandoned cemetery, historic cemetery and graves; requires reporting of human skeletal remains discovery, and specifies penalties associated with violations on the protection of these sacred places.
- [Washington State Historic Building Code \(RCW 19.27.120\)](#)
(<http://apps.leg.wa.gov/RCW/default.aspx?cite=19.27.120>) – This law identifies exception to conformance with the requirements of State's building codes on repairs, alterations, and additions necessary for the preservation, restoration, rehabilitation, strengthening, or continued use of a building or structures for buildings or structures having special historical or architectural significance.
- [Heritage Barn Program \(RCW 27.34.400\)](#)
(<http://apps.leg.wa.gov/RCW/default.aspx?cite=27.34.400>) – This law provides for the governor's advisory council on historic places to review the list of barns submitted by the department for formal recognition as a heritage barn.
- [State Historical Societies - Historic Preservation \(RCW 27.34\)](#)
(<http://apps.leg.wa.gov/rcw/default.aspx?Cite=27.34>) - The purpose of this chapter is to designate the two state historical societies as trustees of the state for maintaining and preserving for the use and benefit of the people of the state those articles and properties which illustrate the history of the state of Washington.

H.1.5 State Memoranda and Agreements

Currently, WAARNG does not have any Memorandum of Agreement (MOAs) or Programmatic Agreements (Pas) negotiated between the WAARNG and the SHPO.

H.2 National Historic Preservation Act Guidance

H.2.1 Section 106

Section 470f. Effects of Federal Undertakings upon property listed in the NRHP; comment by the ACHP (the NHPA, Section 106) states:

The head of any federal agency having a direct or indirect jurisdiction over a proposed federal or federally assisted undertaking in any state and the head of any federal department or independent agency having authority to license an undertaking shall, prior to approval of the expenditure of any federal funds on the undertaking or prior to the

issuance of any license, as the case may be, take into account the effects of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register of Historic Places. The head of any such federal agency shall afford the Advisory Council on Historic Preservation established under part B of this subchapter a reasonable opportunity to comment with regard to such undertaking.

Section 106 of the NHPA requires the “head of any federal agency having direct or indirect jurisdiction over a proposed federal or federally assisted undertaking in any state and the head of any federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. The head of any such federal agency shall afford the Advisory Council on Historic Preservation . . . a reasonable opportunity to comment with regard to such undertaking.”

For the WAARNG, this requirement applies to undertakings on federal property (lands or buildings) or state property with federal actions (such as funding or permits). Projects that have no federal involvement (e.g., no federal funding, no federal action, no federal permits, no federal property) do not fall under Section 106 of the NHPA; however, check state and local preservation laws and regulations (see **Appendix I.1**).

Consultation with the SHPO and/or the ACHP is a critical step in this process. If an undertaking on federal lands may affect properties having historic value to a Tribe, such Tribe shall be afforded the opportunity to participate as consulting parties during the consultation process defined in 36 CFR 800 (see **Appendix I.3**).

The Section 106 process is designed to identify possible conflicts between historic preservation objectives and the proposed activity, and to resolve those conflicts in the public interest through consultation. Neither NHPA nor ACHP regulations require that all historic properties must be preserved. They only require the agency to consider the effects of the proposed undertaking on those properties and fulfill the procedural requirements for the NHPA prior to implementation.

Failure to take into account the effects of an undertaking on historic properties, and afford the ACHP a reasonable opportunity to comment on such effects, can result in formal notification from the ACHP to the head of the federal agency of foreclosure of the ACHP's opportunity to comment on the undertaking pursuant to NHPA. Litigation or other forms of redress can be used against the federal agency in a manner that can halt or delay critical activities or programs.

The ACHP provides the following summary of the Section 106 process (excerpted from www.achp.gov, **incorporates amendments effective Aug. 5, 2004**), as well as the flowchart provided as **Figure I-1**. Hotlinks included in the text are those provided by the ACHP.

Introduction. Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by ACHP. Revised regulations, "Protection of Historic Properties" (36 CFR Part 800), became effective January 11, 2001, and are summarized below.

Initiate Section 106 process. The responsible Federal agency first determines whether it has an undertaking that is a type of activity that could affect historic properties. Historic properties are properties that are included in the National Register of Historic Places or that meet the criteria for the National Register. If so, the agency must identify the appropriate State Historic Preservation Officer/Tribal Historic Preservation Officer* (SHPO/THPO*) with whom to consult during the process. It should also plan to involve the public, and identify other potential consulting parties. If it determines

that it has no undertaking, or that its undertaking is a type of activity that has no potential to affect historic properties, the agency has no further Section 106 obligations.

Identify historic properties. *If the agency's undertaking could affect historic properties, the agency determines the scope of appropriate identification efforts and then proceeds to identify historic properties in the area of potential effects. The agency reviews background information, consults with the SHPO/THPO* and others, seeks information from knowledgeable parties, and conducts additional studies as necessary. Districts, sites, buildings, structures, and objects listed in the National Register are considered; unlisted properties are evaluated against the National Park Service's published criteria, in consultation with the SHPO/THPO* and any Indian tribe or Native Hawaiian organization that may attach religious or cultural importance to them.*

If questions arise about the eligibility of a given property, the agency may seek a formal determination of eligibility from the National Park Service. Section 106 review gives equal consideration to properties that have already been included in the National Register as well as those that have not been so included, but that meet National Register criteria.

If the agency finds that no historic properties are present or affected, it provides documentation to the SHPO/THPO* and, barring any objection in 30 days, proceeds with its undertaking.

If the agency finds that historic properties are present, it proceeds to assess possible adverse effects.

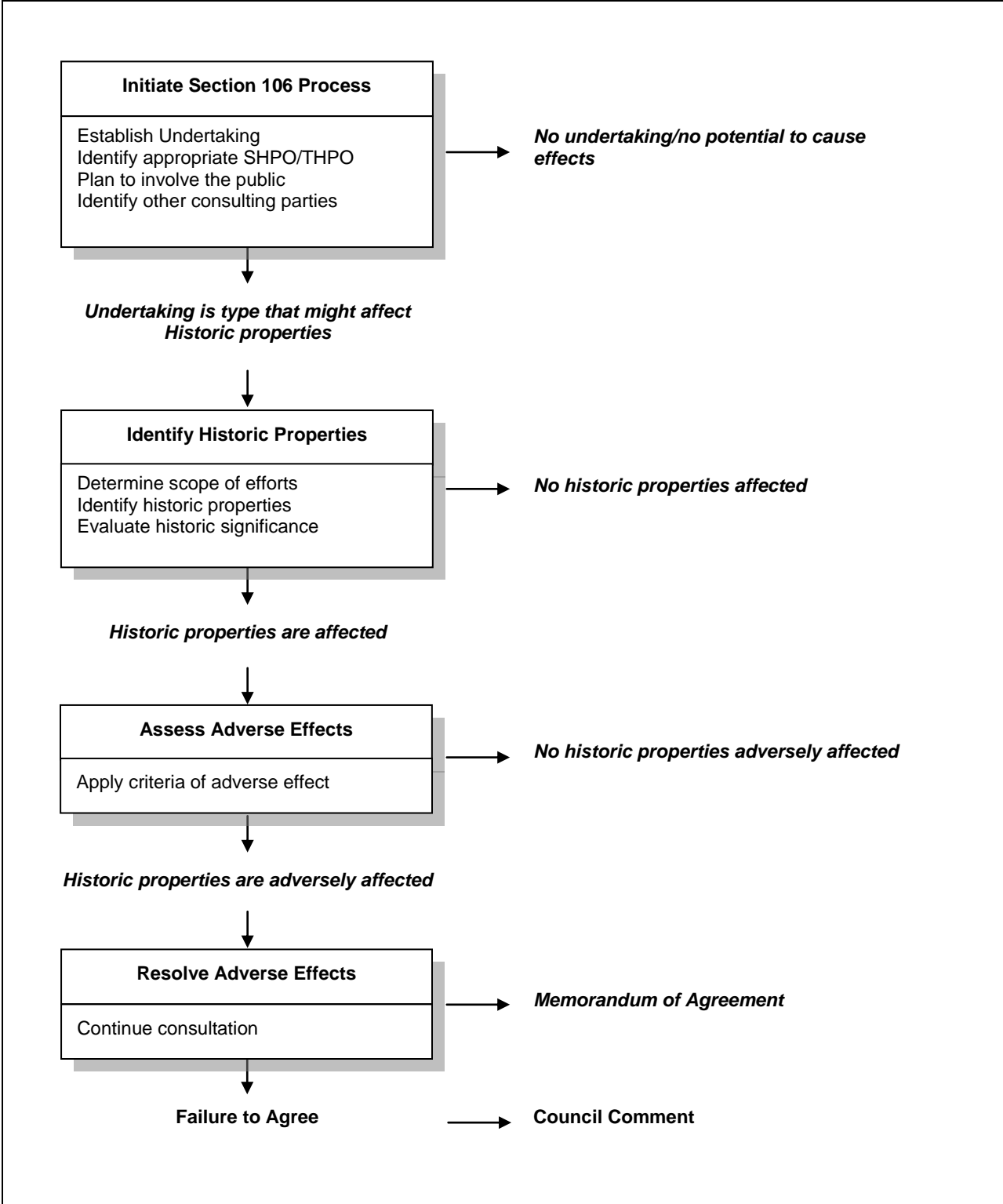
Assess adverse effects. *The agency, in consultation with the SHPO/THPO*, makes an assessment of adverse effects on the identified historic properties based on criteria found in ACHP's regulations.*

If they agree that there will be **no adverse effect**, the agency proceeds with the undertaking and any agreed-upon conditions.

*If they find that there is an **adverse effect**, or if the parties cannot agree and ACHP determines within 15 days that there is an adverse effect, the agency begins consultation to seek ways to avoid, minimize, or mitigate the adverse effects.*

Resolve adverse effects. *The agency consults to resolve adverse effects with the SHPO/THPO* and others, who may include Indian tribes and Native Hawaiian organizations, local governments, permit or license applicants, and members of the public. ACHP may participate in consultation when there are substantial impacts to important historic properties, when a case presents important questions of policy or interpretation, when there is a potential for procedural problems, or when there are issues of concern to Indian tribes or Native Hawaiian organizations.*

Consultation usually results in an MOA, which outlines agreed-upon measures that the agency will take to avoid, minimize, or mitigate the adverse effects. In some cases, the consulting parties may agree that no such measures are possible, but that the adverse effects must be accepted in the public interest.



Source: <http://www.achp.gov/regsflow.html>

Figure H-1. Section 106 Regulations Flow Chart

Implementation. *If an MOA is executed, the agency proceeds with its undertaking under the terms of the MOA.*

Failure to resolve adverse effects. *If consultation proves unproductive, the agency or the SHPO/THPO*, or ACHP itself, may terminate consultation. If a SHPO terminates consultation, the agency and ACHP may conclude an MOA without SHPO involvement. However, if a THPO* terminates consultation and the undertaking is on or affecting historic properties on tribal lands, ACHP must provide its comments. The agency must submit appropriate documentation to ACHP and request ACHP's written comments. The agency head must take into account ACHP's written comments in deciding how to proceed.*

Tribes, Native Hawaiians, and the public. *Public involvement is a key ingredient in successful Section 106 consultation, and the views of the public should be solicited and considered throughout the process.*

The regulations also place major emphasis on consultation with Indian tribes and Native Hawaiian organizations, in keeping with the 1992 amendments to NHPA. Consultation with an Indian tribe must respect tribal sovereignty and the government-to-government relationship between the Federal Government and Indian tribes. Even if an Indian tribe has not been certified by NPS to have a THPO who can act for the SHPO on its lands, it must be consulted about undertakings on or affecting its lands on the same basis and in addition to the SHPO. Consultation must also consider sites with traditional religious and cultural importance that may be affected by an undertaking, regardless of the property location.

Timing: The timing for identification surveys and evaluations in support of Section 106 undertakings will vary depending on the size and nature of the resources that may be affected by the undertaking, and the state of current knowledge (e.g., previous investigations) completed with the undertaking's Area of Potential Effect (APE). The CRM can anticipate 4 to 6 months to complete investigations involving small numbers of buildings or small land parcels, and longer for projects involving large numbers of buildings or larger land parcels.

Resolution of adverse effects (mitigation) could require an additional 6 to 12 months, depending on the complexity of the situation. In most cases, an MOA is developed. See **Appendix J** on agreement documents.

Stakeholders in the process include Tribes and the public.

H.2.2 Emergencies

Per 36 CFR 800.12 (emergency situations), the timeline for Section 106 review of renovations and repairs to historic buildings can be substantially reduced if the renovation or repair is required as a result of an emergency situation (e.g., flooding, tornados, earthquakes, or hurricanes). **The reduction of the timeline only applies in those situations where the President or the Governor has declared an official state of emergency.** The CRM notifies the ACHP, the SHPO/THPO, and any other interested parties of the project; these parties then have 7 days rather than the traditional 30 days to comment on the undertaking. As a proactive measure, the WAARNG could also work with the ACHP, SHPO/THPO, and interested parties to develop a PA (see **Appendix J**) outlining streamlined procedures for emergency situations.

Procedures: The CRM will ensure that all reasonable efforts are made to avoid or minimize disturbance of significant cultural resources during emergency operations and will communicate with applicable WAARNG personnel and SHPO/THPO/Tribes regarding potential effects on significant cultural resources that could occur in association with such activities.

Upon notification of a proposed emergency operation, the CRM will notify the ACHP and consult with the SHPO and THPO/Tribes, as appropriate, regarding the known or likely presence of cultural resources in the area of the proposed operation. The ACHP, SHPO/THPO/Tribes are expected to reply (Tribes do not

have approval authority) in 7 days or less. Notification may be verbal, followed by written communication. This applies only to undertakings that will be implemented within 30 days after the need for disaster or emergency has been formally declared by the appropriate authority. An agency may request an extension of the period of applicability prior to the expiration of the 30 days. The CRM will ensure that the heads of all units involved in the project are briefed regarding the protocol to be followed in the case of the inadvertent discovery of cultural resources during emergency operations.

Once the emergency has passed, the CRM will complete all appropriate actions to complete the Section 106 process, including submittal of any reports or correspondence documenting the actions taken.

H.2.3 BRAC Actions

The 2005 Base Realignment and Closure (BRAC) Commission issued 190 separate DoD recommendations, including 837 distinct and identifiable BRAC "close" or "realign" actions. The purpose of BRAC actions is to save money and promote jointness between the Services. What BRAC means to the WAARNG cultural resources program is that all closures or realignments approved by the BRAC Commission affecting NRHP eligible or listed properties in the WAARNG real property inventory should be reviewed as Section 106 undertakings. The exception to this statement is closure of RCs (Armories); the BRAC language very specifically identifies the decision to close an RC as part of the realignment of forces within the WAARNG virtual installation as a state, rather than a federal action and, therefore, not subject to Section 106 review. However, State or local preservation laws and regulations could still apply to the RC closures. The language of the BRAC Commission reads:

a. Close Mann Hall Army Reserve Center, Area Maintenance Support Shop #80 and Walker Army Reserve Center in Spokane, WA and relocate units to a new consolidated Armed Forces Reserve Center and Organizational Maintenance Shop on Fairchild Air Force Base. The new AFRC shall have the capability to accommodate units from the following Washington ARNG facilities: Washington if the state decides to relocate those units.

b. Close Wagenaar Army Reserve Center Pasco, WA and relocate units to a new consolidated Armed Forces Reserve Center on Yakima Training Center.

c. Realign Pendleton Army Reserve Center on Yakima Training Center by moving all assigned units to the new Armed Forces Reserve Center on Yakima Training Center. The new AFRC shall have the capability to accommodate units from the following Washington ARNG facility: Washington ARNG Ellensburg Readiness Center, if the state decides to relocate those units.

d. Close the Oswald United States Army Reserve Center, Everett, WA, and relocate units to a new Armed Forces Reserve Center in the Everett, WA area if the Army is able to acquire suitable land for construction of the new facility. The new AFRC shall have the capability to accommodate units from the following Washington ARNG facilities: Washington ARNG Everett Readiness Center and Snohomish Readiness Center, if the state decides to relocate those units.

H.2.4 Section 110 of the National Historic Preservation Act and Executive Order 13287 "Preserve America"

It is the Department of the Army's responsibility to provide the report to the ACHP by 30 September of each year. The data are obtained from the Army IFS and ARNG PRIDE databases. Each state CRM is responsible for updating the PRIDE database and responding to annual AEDB-EQ data calls to provide accurate data for this report. The specific reporting requirements outlined in EO 13287 (which cite Section 110 of the NHPA) include

- a. Accurate information on the state of federally owned historic properties is essential to achieving the goals of this order and to promoting community economic development through local partnerships. Each agency with real property management responsibilities shall prepare an assessment of the current status of its inventory of historic properties required by Section

110(a)(2) of the NHPA (16 U.S.C. 470h-2(a)(2)), the general condition and management needs of such properties, and the steps underway or planned to meet those management needs. The annual assessment shall also include an evaluation of the suitability of the agency's types of historic properties to contribute to community economic development initiatives, including heritage tourism, taking into account agency mission needs, public access considerations, and the long-term preservation of the historic properties.

- b. Each agency with real property management responsibilities shall review its regulations, management policies, and operating procedures for compliance with Sections 110 and 111 of the NHPA (16 U.S.C. 470h-2 & 470h-3) and make the results of its review available to the ACHP and the Secretary of the Interior. If the agency determines that its regulations, management policies, and operating procedures are not in compliance with those authorities, the agency shall make amendments or revisions to bring them into compliance.
- c. Each agency with real property management responsibilities shall, by 30 September 2005, and every third year thereafter, prepare a report on its progress in identifying, protecting, and using historic properties in its ownership and make the report available to the ACHP and the Secretary of the Interior. The ACHP shall incorporate these data into a report on the state of the federal government's historic properties and their contribution to local economic development and submit this report to the President by 15 February 2006, and every third year thereafter.
- d. Agencies may use existing information-gathering and reporting systems to fulfill the assessment and reporting requirements of subsections 3(a)-(c) of this order.
- e. The head of each agency shall designate a senior policy level official to have policy oversight responsibility for the agency's historic preservation program and notify the ACHP and the Secretary of the Interior of the designation. This senior official shall be an assistant secretary, deputy assistant secretary, or the equivalent, as appropriate to the agency organization. This official, or a subordinate employee reporting directly to the official, shall serve as the ACHP federal preservation officer in accordance with Section 110(c) of the NHPA. The senior official shall ensure that the federal preservation officer is qualified consistent with guidelines established by the Secretary of the Interior for that position and has access to adequate expertise and support to carry out the duties of the position.

Note – Policy limits NRHP nominations only to those properties the Army plans to develop for public use or transfer out of federal management through privatization efforts. Other nominations will be considered only when justified by exceptional circumstances.

H.3 Regulatory Requirements for Tribal Consultation

H.3.1 National Environmental Policy Act

The purposes of tribal consultation under NEPA are to identify potential conflicts that would not otherwise be known to the WAARNG, and to seek alternatives that would resolve the conflicts. It should be clear to all that NEPA's charge to "preserve important historic, cultural, and natural aspects of our national heritage" cannot be fully met without informed consideration of American Indian heritage.

An administratively key purpose is to develop documentary records sufficient to demonstrate that the WAARNG has taken adequate steps to identify, consult with, and weigh the interests of federally recognized tribes and Native Hawaiian organizations in its decision making. **Figure I-2** provides a flowchart summarizing Native American consultation in support of NEPA.

An infringement of religious freedom, or a burden on religious practice, or a loss of religiously significant resources cannot be "mitigated" in the usual sense of the word (i.e., to lessen, soften, lighten). It is possible, however, to deal with potential infringement, burden, or loss by developing alternatives or management options that would avoid the specific impact. Avoiding an impact by not taking a certain action or parts of an action fits within the meaning of mitigation as defined in NEPA.

H.3.2 National Historic Preservation Act

The NHPA requires the identification and consideration of potential adverse effects on properties that might be significant due to their traditional or historic importance to a federally recognized tribes and Native Hawaiian organizations. The specific requirement for consultation relative to Section 106 of the NHPA is in Section 101(d)(6), added by amendments passed in 1992. **Figure I-3** provides a flowchart of how consultation with Tribes is integrated into the Section 106 review process.

Consultation for Section 106 purposes is limited to federally recognized tribes and Native Hawaiian organizations. It focuses (1) on identifying properties with tribal religious or cultural significance that are potentially eligible for inclusion in the NRHP, and (2) on taking into account the effects a proposed federal undertaking might have on them.

The 1992 NHPA amendments add significant new provisions concerning American Indian tribal participation in historic preservation. Regarding consultation, besides Section 101(d)(6) discussed above, Section 110(a)(2) directs federal agencies' programs to ensure

“(D) that the agency’s preservation-related activities are carried out in consultation with other Federal, State, and local agencies, Indian tribes, [and others] carrying out historic preservation planning activities. . . and . . .

“(E) that the agency’s procedures for compliance with Section 106—

“(ii) provide a process for the identification and evaluation of historic properties . . . and the development and implementation of agreements, in consultation with State Historic Preservation Officers, local governments, [and] Indian tribes . . . regarding the means by which adverse effects . . . will be considered”

The language in Section 101(d)(6), requiring agencies to consult with federally recognized tribes and Native Hawaiian organizations that attach religious and cultural significance to traditional properties that may be eligible for the NRHP, reinforces procedures.

Under Section 101(d)(6)(B) and Section 110(E)(ii), consultation may be called for when data recovery is being considered to mitigate adverse effects on a property’s scientific importance, if the property also has ascribed religious and cultural significance.

Where appropriate, such consultation opportunities may be used to meet the separate consultation requirements of 43 CFR 7.7 and Section 3(c) of NAGPRA, as well as those of Sections 101 and 110 of the NHPA.

H.3.3 Archaeological Resources Protection Act

ARPA, Section 4(c), requires notification of the appropriate federally recognized tribes and Native Hawaiian organizations before approving a cultural resource use permit for the excavation (testing and data recovery) of archaeological resources (more than 100 years old), if the responsible CRM determines that a location having cultural or religious importance to the Tribe could be harmed or destroyed. **Figure I-4** outlines the permitting process and consultation requirements for emergency excavations under ARPA.

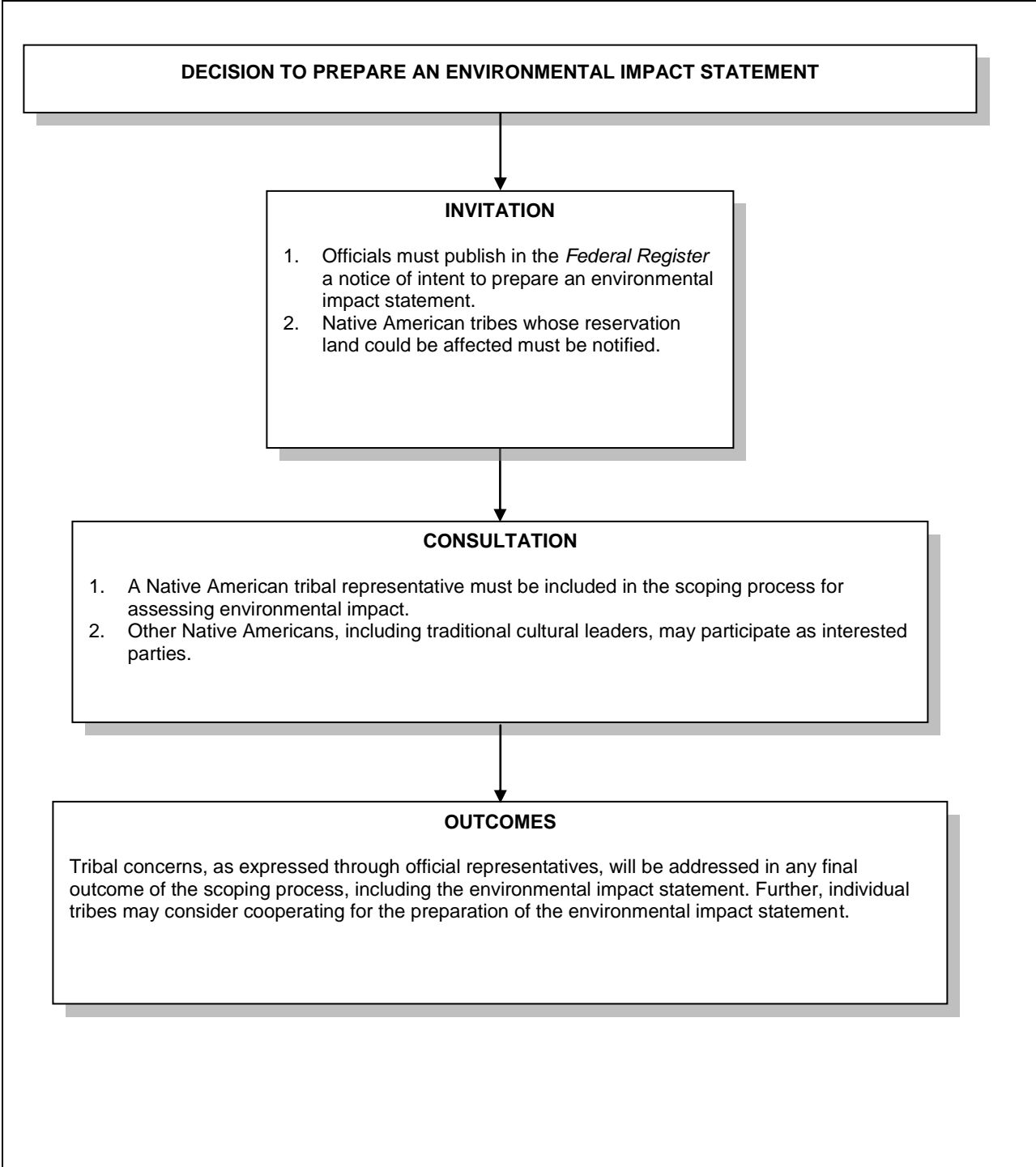


Figure H-2. Native American Consultation in Support of the National Environmental Policy Act

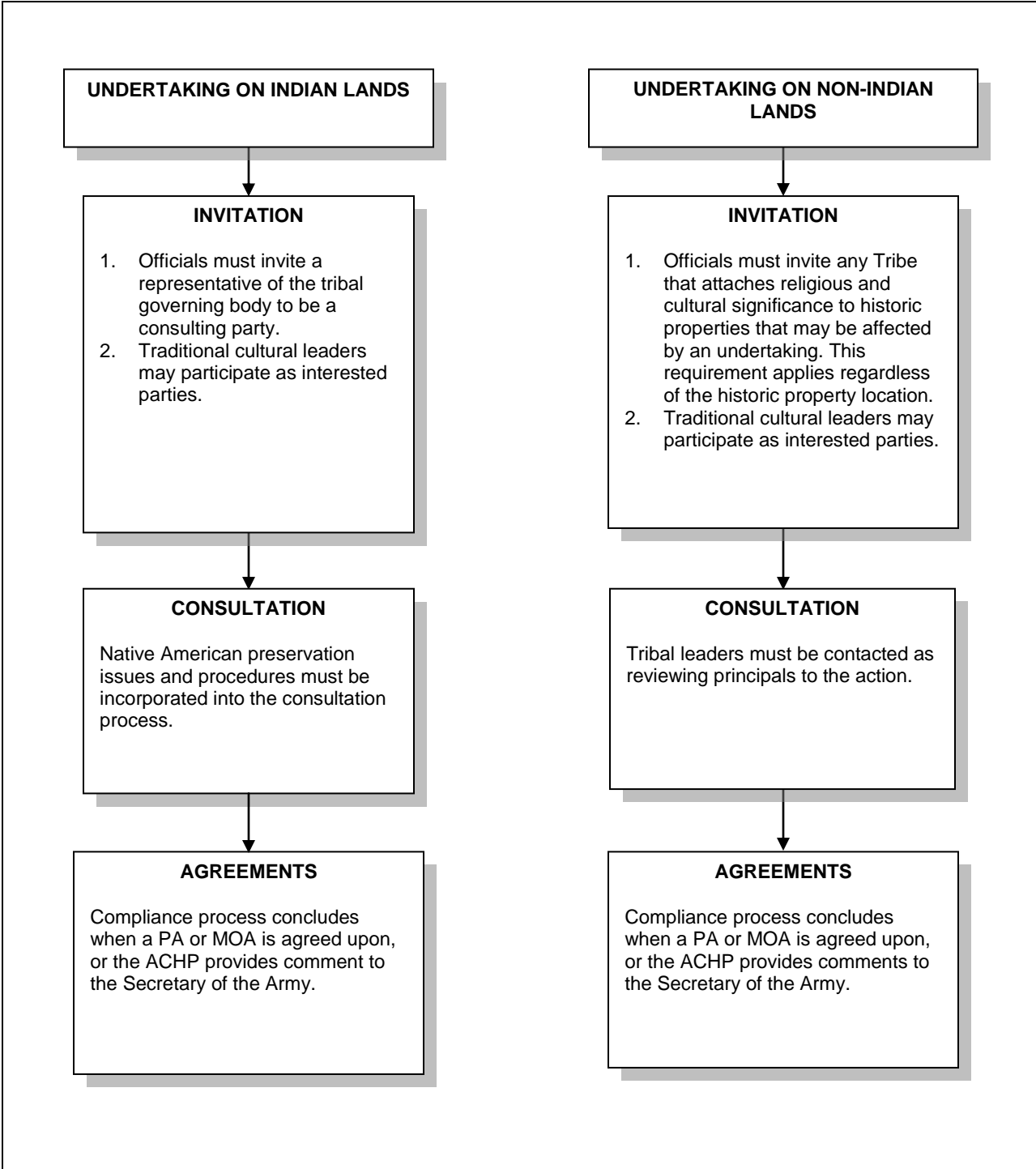


Figure H-3. National Historic Preservation Act Section 106 Compliance (16 U.S.C. 470(f)) Consultation

The uniform regulations implementing ARPA include a provision that the WAARNG may also give notice to any other American Indian group known to consider potentially affected locations as being of religious or cultural importance (43 CFR 7.7(a)(2)).

H.3.4 Native American Graves Protection and Repatriation Act

The purpose of consultation under NAGPRA is to reach agreement as to the treatment and disposition of the specific kinds of “cultural items” defined in the act: Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony.

The WAARNG is required to consult with the appropriate federally recognized tribe, Native Hawaiian organization, or lineal descendant under four circumstances:

A summary of WAARNG holdings, dating from before the act, indicates that unassociated funerary objects, sacred objects, or objects of cultural patrimony are present

An inventory of WAARNG holdings, dating from before the act, finds human remains or associated funerary objects

The WAARNG is processing an application for a permit that would allow the excavation and removal of human remains and associated funerary objects from federal lands

Items covered by the act have been disturbed unintentionally.

Only the last two of these circumstances are discussed here.

Intentional Removal

Under NAGPRA, the WAARNG must consult with appropriate federally recognized tribes, Native Hawaiian organizations, or individuals prior to authorizing the intentional removal of American Indian human remains and funerary objects found with them.

Documentation to show that consultation pursuant to Section 3(c) of NAGPRA has occurred must be included and maintained in the decision record.

A cultural resource use permit or equivalent documentation is generally required before human remains and artifacts covered by the act may be excavated or removed from federal lands. Permit-related notification and consultation, if it is requested, are required by ARPA Section 4 and 43 CFR 7.7.

When permit-related consultation will be taking place, it should be appropriate in most cases to use that opportunity to consult prospectively with respect to NAGPRA, to develop procedures to be followed in case human remains and cultural items are discovered. In any event, consultation for NAGPRA purposes must occur before the excavation or removal of human remains and cultural items may be authorized.

Unintended Disturbance

Human remains or cultural items subject to NAGPRA discovered as a result of an ARNG or ARNG-authorized activity, such as construction or other land-disturbing actions, are to be handled in the manner described in the “inadvertent discovery” procedures found at Section 3(d) of NAGPRA.

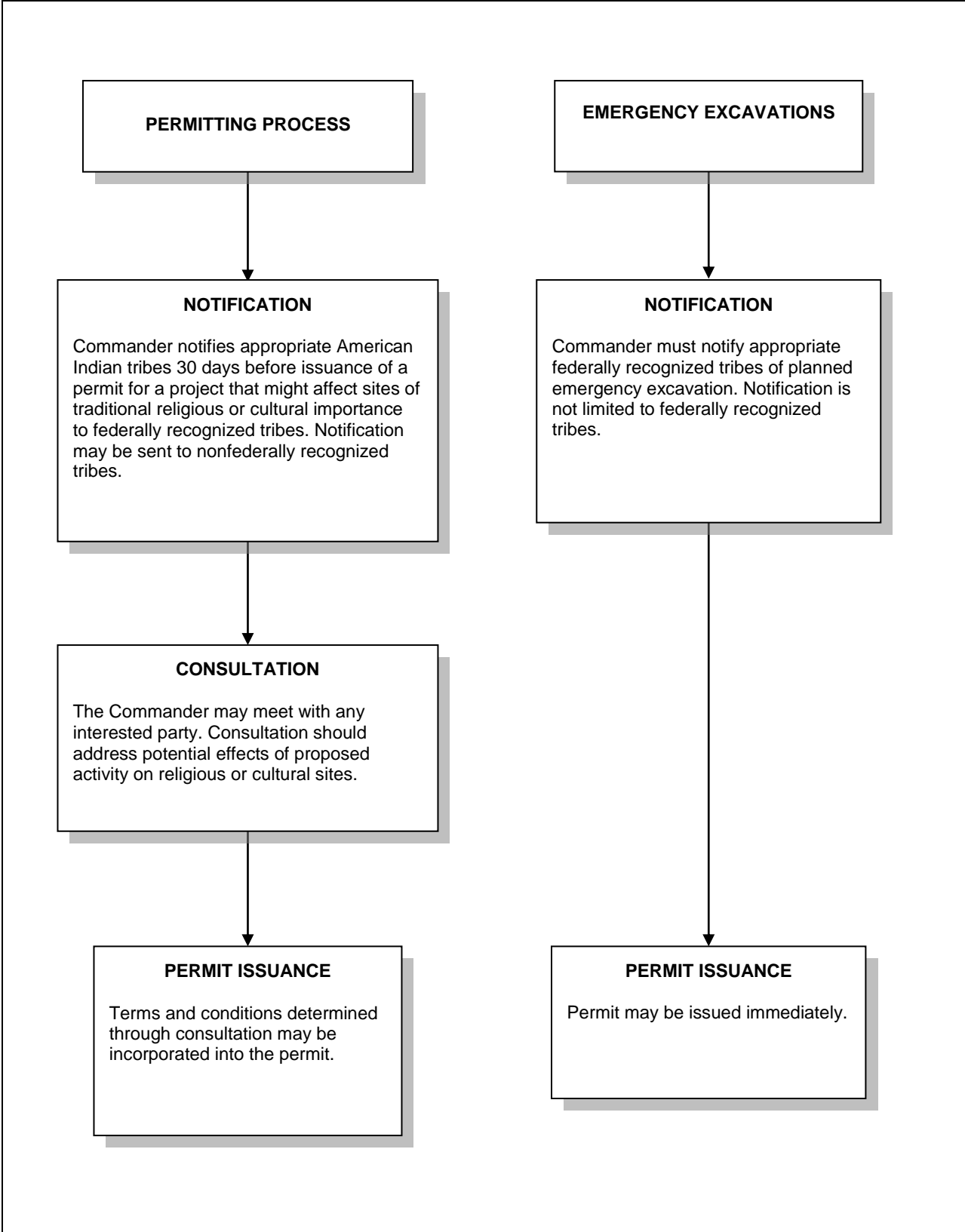


Figure H-4. Archaeological Resources Protection Act

Where there is a reasonable likelihood of encountering undetected cultural items during a proposed land use, agreements should be negotiated with Tribes or groups before the project is authorized to provide general guidance on treatment of any cultural items that might be exposed. Having these agreements in place saves time and confusion during the action (see **Appendix J**). In particular, the WAARNG should make provisions repatriation of human remains and funerary objects to the appropriate Tribes or living descendants, if they can be identified.

H.3.5 American Indian Religious Freedom Act

The primary purpose of AIRFA was to establish a policy of federal protection for traditional American Indian religious freedoms. Therefore, consultation for purposes of AIRFA is specifically directed at identifying the concerns of traditional American Indian religious practitioners relative to proposed WAARNG actions.

Consultation pursuant to AIRFA should be initiated as soon as land uses are proposed that have the potential to affect American Indian religious practices.

The CRM must make reasonable efforts to elicit information and views directly from the American Indians whose interests would be affected. All potentially interested Tribes and groups should be contacted by letter and telephone to request their direct participation and input. This would include Tribes and groups that live near or use the lands in question, and also those known to have historical ties to the lands but now live elsewhere.

In any such communication, it must be clear that the purpose of the request is to learn about places of traditional religious importance that cannot be identified without the Tribe's or group's direct assistance, so that the WAARNG can know to protect the places from unintended harm and to provide for appropriate American Indian access.

Following initial mail or telephone contact, if there is reason to expect that places of religious significance to the federally recognized tribe or Native Hawaiian organization are likely to be affected by WAARNG actions, the district manager or an authorized representative should initiate face-to-face personal contact with appropriate officials of the Tribe or group or with traditional religious leaders.

The purpose of such personal contact is to seek mutually acceptable ways to avoid or minimize disturbance of traditional religious places or disruption of traditional religious practices.

Specific requests to obtain and consider information during planning or decision-making must be thoroughly documented, both as part of the administrative record and as a basis for determining if further inventory or consultation will be needed in subsequent WAARNG actions.

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APPENDIX I

CULTURAL RESOURCES MANAGER'S GUIDANCE

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Cultural Resources Manager's Guidance

This appendix provides guidance and procedures for the CRM to implement the ICRMP and meet cultural resources compliance requirements. This chapter is presented in three sections. The first section provides overarching guidance and procedures that implement the ICRMP and achieve ICRMP objectives program-wide. The second section provides guidance for project-specific or resource-specific tasks and actions. These sections also provide timelines for completing these tasks. The third section provides references and information sources that the CRM might find useful or that have been referenced throughout the text.

The WAARNG is capable of implementing this ICRMP Revision and fulfilling projects in Chapter 2. However, implementation of this ICRMP Revision is no guarantee that funds will be available. Unfunded work might have to be scheduled for later years.

The Army designated a percentage of environmental funding to ARNG to support state ARNG federal requirements. Though funds are not fenced specifically for cultural resource projects, state cultural resource projects requested through the STEP funding request process are rolled into the amount request from Army by ARNG. The DA allotted amount is then distributed by ARNG according to the state's listed priority for cultural resources projects supporting federal missions. Some discretion is allowed the TAG at the state level to account for short-term mission priority changes. Some projects are paid for by the proponent such as ITAM. The STEP policy and guidance can be used for estimating cultural resources projects.

I.1 Program-Wide Guidance

This section provides guidance and procedures for ongoing and program-wide cultural resource management. Project-specific guidance is provided in section I.2.

I.1.1 Cultural Resources Manager Reports and Annual Review of ICRMP

The CRM is responsible for the various reports and updates to maintain a current cultural resource management program. **Table I-1** lists the reports and due dates.

Table I-1. Cultural Resources Reporting and Review Requirements

Activity Requirement	Date Due
ICRMP Annual Review	On anniversary of signing of the FNSI for the original ICRMP EA
Army Environmental Database – Environmental Quality (AEDB-EQ)	Quarterly, or as data calls come through to ARNG
Input projects into STEP Tool	Once each year (~1 March – 30 April)
Update PRIDE database	On anniversary of signing of the FNSI for the original ICRMP EA, as well as after each new inventory or evaluation effort is completed and SHPO has concurred with eligibility determinations

ICRMP Annual Review

In accordance with AR200-1, the annual report on the status of implementing the ICRMP over the previous year is required. The purpose of the Annual Report is to provide ARNG a progress report on implementation of CRM program and ICRMPs. A template for the Annual Report is provided in **Appendix**

F. Per ARNG’s Draft ICRMP Implementation Guidance, the Annual Report should include the following elements:

Compare stated mission, goals, and objectives in ICRMP with current mission, goals, and objectives, focusing on expected changes to impacts on cultural resources.

Review the status of cultural resources and Master Planning projects: Past, Present and Future

Review and update external contact information: SHPOs, THPOs, or any interested parties

Provide a summary of highlights, key achievements, hot issues, and points of interest

The **ACTUAL DUE DATE** for the report is **15 calendar days AFTER** the date of the signing of the FNSI for the EA or the date of the signing of the ICRMP Revision if a REC was submitted. For example, if the FNSI or ICRMP was signed on 1 May, then the annual report is due by or on 16 May.

Submission of the Annual Report also is tracked in the State Performance Indicator Report System (SPIRS) on a quarterly basis. The SPIRS is submitted to the state Chief of Staff from ARNG. It provides the TAG a brief picture on how ARNG sees state compliance with various requirements. The submission of the Annual Report is one of the requirements reported through the ARNG-ARE CRM Team. Reporting is based on the fiscal year; the quarters and associated dates are listed in **Table I-2; please note that these dates may vary on an annual basis and check with ARNG.**

Table I-2. SPIRS Timelines

Quarter	Months Covered	Date SPIRS Reported to TAGs	Final Date for Annual Report Submission
1st	October to December;	26 January	15 January
2nd	January to March	26 April	15 April
3rd	April to June	26 July	15 July
4th	July to September	26 October	15 October

The report is published on the 26th of the month following the completion of the quarter. Hence if you have submitted your annual report on time, you will be rated as **Green** for the next year. If you do not get your report in on time, then your state will go to **Red** and you may hear from your TAG. An **Amber** rating can occur if you submit an incomplete report and not supplied the additional information by the deadline.

Your Annual Report is related to the SPIRS by the FNSI date. So for the example above, if your FNSI or ICRMP Revision was signed on 1 May, then you SPIRS reporting period is 3rd quarter. Hence if you don’t get your Annual Report in by the 15th of May, you’ll be getting a reminder email. You then have essentially two months to get your report in so your state will report **Green** on the quarterly SPIRS report. Of course, **ALL** states should get their Annual Report in by **15 calendar days AFTER** their FNSI/ICRMP Revision date.

ICRMP Implementation

ARNG has outlined the following steps for CRMs to take in implementing their ICRMP or ICRMP Revision once the document has been certified as legally sufficient. Draft guidance on this document is provided in **Appendix J.**

Align project lists (see Chapter 2) with STEP Projects

Develop Soldier’s Cards containing cultural resources information for Training Installations

Develop Maintenance and Treatment Plans for eligible buildings or historic districts

Distribute SOPs to Internal Stakeholders (consider a training session)

Network with other ARNG CRMs

Update the ICRMP as needed, but annually at a minimum

Know your resources and planned projects; identify if agreement documents would help streamline your program.

Programming and Budgeting

The STEP Tool serves as a source document in programming, budgeting, and allocating resources needed to execute the ARNG environmental program. It is used to show past accomplishments and expenditures; to indicate the status of current projects; to refine and validate requirements for the budget year; and to support planning, programming, and budgeting for the out years. The STEP Tool is used by the CRM when requirements are identified. ARNG-ILE-T reviews the requirements for accuracy and validates the projects. There are approximately 13 cultural resources project “types” identified in the STEP Tool project catalog. Projects need to be linked with operational goals and needs.

Timing: The programming and budgeting must be completed once a year (15 March – 15 July) and submitted to ARNG-ILE-T.

Army Environmental Database – Environmental Quality (AEDB-EQ)

The AEDB-EQ is a World Wide Web-based data system that serves as a primary source of information for conveying the Army’s environmental status to the senior Army leadership, DoD, and Congress. Its primary focus is to track Army compliance with environmental laws for multi-media reporting and management areas through inspections, enforcement actions, fines and penalties, and other program parameters on a quarterly basis. Primary reports for these data are the Quarterly Army Performance Review (to Secretary of the Army), and the semi-annual DoD Environmental Quality In Progress Review (IPR) (to Deputy Under Secretary of Defense), the fall IPR being the Army’s input to the DoD AEDB-EQ to Congress (RCS 1997). In addition to the quarterly reports, the AEDB-EQ data calls in the fall and spring also include requirements for additional data required by the semi-annual DoD in IPRs and other reports that HQDA submits.

The AEDB-EQ is a process for auditing the status of the environment. It is the CRM’s responsibility at the state/territory level to provide this information to ARNG at a minimum on an annual basis, or as requested. The CRM completes this task in a minimum of two ways: (1) by updating PRIDE on the anniversary of the signing of the FNSI for the original ICRMP EA or the anniversary of the signing of this ICRMP Revision and (2) by completing the Cultural Resources Questionnaire and submitting it to ARNG (see **Appendix J**).

Army Historic Preservation Campaign Plan

The goals of the Army Historic Preservation Campaign Plan are to promote cost effective historic building management and to improve the balance between NHPA compliance and the mission of the Army. The goals are approached through Army policy and guidance actions, and through regulatory and legislative actions. The Army’s existing programming and reporting mechanisms include the AEDB-EQ, integrated facilities system (IFS) into which PRIDE feeds, and the Installation Status Report (ISR). These existing programming and reporting mechanisms are used for upward reporting of resource requirements and status of various aspects of the program. The existing reporting systems are leveraged extensively for reporting on the success indicator metrics of this campaign plan. The plan can be found at www.aec.army.mil.

I.1.2 Geographic Information System and Data Management

Integrating WAARNG cultural resources management data with a statewide GIS program allows the WAARNG cultural resources program to more efficiently support the WAARNG’s mission of readiness. Minimally, GIS layers should be developed for historic buildings, archaeological sites, predictive archaeological models, and the location of the geographic area where Tribes and Native Hawaiian

organizations have ancestral ties. Ideally, historic buildings survey data should be stored within a database that can be related to a GIS theme. GIS can facilitate application of the cultural landscape approach to cultural resource management and integration of cultural resource best management practices into installation-wide planning and projects. To aid in the integration of cultural resources information into overall WAARNG installations and statewide planning and management, layers summarizing all known cultural resource sites and larger cultural landscapes, ground disturbance, and archaeological sensitivity (predictive modeling) will be developed within the GIS. Development of these layers should be based on

Maps and reports supplied from the SHPO or Tribes

Extant GIS information compiled (e.g., the built environment at ARNG installations)

Existing and future cultural resource surveys and evaluations.

GIS layers and themes depicting archaeological resources and sacred sites are considered sensitive and will not be released to the general public. These layers should be password protected.

When preparing the scope of work (SOW) for contracts addressing cultural resources issues, results of cultural resources surveys and evaluations should be delivered in GIS format to include survey areas, transects, and cultural sites and properties and eligibility status. Within the SOW, reference the latest Army/ARNG guidance regarding GIS file formats and standards, and include that **all data created or modified in this contract will adhere to the Spatial Data Standards (SDS) and the Federal Geographic Data Standards (FGDC) metadata standards.**

Maps should include, at a minimum, a north arrow, legend, map creator, map purpose, and creation date.

GIS themes depicting buildings and other facility types should be attributed with the appropriate keys to align with the PRIDE database. This will enable the query and display of the cultural resources information stored within PRIDE through GIS. For example, a map can be created showing whether or not a building has been evaluated, is eligible, or is listed in the NRHP, or as a national landmark; or if the building is a contributing resource to a district that is eligible or listed in the NRHP.

I.1.3 Standard Operating Procedures

SOPs have been prepared to assist WAARNG personnel who are not responsible for cultural resources management, but whose areas of responsibility could affect cultural resources. Chapter 3 includes these SOPs. SOPs should be made available to all personnel including any tenants, contractors, and occasional users. Include an overview in the orientation packet for tenants and occasional users, and include appropriate SOPs in contracts. SOPs can also be featured on the facility web site. Flow charts and procedures for inadvertent discovery can also be included in Trainers' Guides and Soldiers' Cards.

Procedures: The CRM will distribute these SOPs to all WAARNG personnel and provide guidance and training, as necessary (CRMs should complete a log documenting SOP distribution; see **Appendix E**).

I.1.4 Cultural Resources Training

Training for various staff is a prerequisite for properly implementing the ICRMP and for good stewardship of cultural resources. Many training opportunities are available for environmental staff, as well as non-environmental staff. Preferably the CRM shall have a basic knowledge of CRM and education in a related field, or at least a CRM introductory training certificate.

Training for CRM personnel could include laws and regulation overview, Section 106, maintenance of historic property, preservation of cultural landscapes, NAGPRA, agreement documents, tribal consultation, and curation. CRM training courses usually range from 3 to 5 days. Register and plan in advance.

For the CRM, training recommendations include

Primary Training – Section 106, Native American consultation workshop, ARNG CRM 101 class (offered every 2 years), and ICRMP workshop if available (offered every 4 or 5 years)

Secondary Training – Agreement documents, NAGPRA, and ICRMP workshop

Tertiary Training – Integrating GIS and cultural resources, and advanced Section 106.

For environmental staff and the CRM, training opportunities include

ARNG annual workshop (topics vary) – gko/ARNG.army.mil, and regional consultation workshops (two per year)

Department of Defense (Denix) DoD Conservation Workshop (every 2 years)

Advisory Council on Historic Preservation – www.achp.gov

U.S. Army Corps of Engineers, Seattle District – www.nws.usace.army.mil

National Preservation Institute – www.npi.org

Civil Engineer Corps Officers School – www.cecos.navy.mil.

For non-environmental WAARNG personnel, training is crucial to ensure compliance with environmental laws and policies and protection of cultural resources. By interfacing with field commanders, project planners, facility managers, and TAG staff, the CRM can develop solutions and programs that blend with existing training opportunities and the WAARNG mission (see **Table 2-6**).

The CRM should provide a training program in conjunction with, and supported by, operations for training site managers, field commanders and their troops, maintenance staff, and others who might encounter cultural resources. Training subjects can include understanding SOPs in Chapter 3, introduction to cultural resources regulations and management, and identification of cultural resources. Information from the training program can be summarized and included with training site information packages for soldiers, and can be placed on bulletin boards at historic facilities as reinforcement to training. A sample training brief is included in **Appendix J**.

I.1.5 Professional Qualification Standards

ARNG CRMs typically are not trained historians, archaeologists, ethnographers, or architectural historians, but are more often individuals assigned the CRM position as a collateral duty. Although CRMs are required to undergo training, as outlined in section I.1.4, most will not reach a level of training equivalent to prevailing professional standards. Accordingly, the CRM will need to hire consultants to complete inventory and evaluation projects. To ensure that the consultants being hired have the appropriate professional qualifications, they must meet the standards used by the NPS and published in 48 FR 44716 (September 1983). The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise might be needed, depending on the complexity of the task and the nature of the historic properties involved.

I.2 Project-Specific and Resource-Specific Guidance

This section provides guidance and procedures for ongoing project-specific, and resource-specific cultural resources management.

I.2.1 Archaeological Investigations

Because the WAARNG manages land as well as buildings and structures, and conducts actions that can result in ground disturbance, the WAARNG will have requirements under Sections 106 and 110 of the NHPA to identify and evaluate archaeological resources on the land areas that it manages. The following

sections outline the range of identification and evaluation investigations that could be completed by the CRM as part of the WAARNG's management of archaeological resources.

Archaeological Predictive Models

Analysis of spatial relationships of known cultural resources can assist in determination of nonrandom patterns of prehistoric land use. Predictive models where archaeological surveys have not been completed can be useful for planning purposes to determine sensitive areas and additional project needs for avoidance or mitigation, prediction of future impacts and alternative development, tribal consultation, and development of training scenarios that avoid sensitive resources. Also, archaeological surveys can be stratified to focus more (not exclusively) on high-sensitivity areas when 100 percent intensive surveying and testing is cost- or time-prohibitive.

Modeling can be completed as a separate project, or as part of the research phase of a specific archaeological survey project. Areas of high, medium, or low probability to yield sites are modeled and then tested in the field to support the model theory. The WA SHPO has existing predictive model, which can be accessed by participating in a data-sharing agreement. State historical societies may also have predictive modeling parameters such as topography, elevation, proximity to water, and vegetation types to assist with modeling on WAARNG lands.

Appendix C contains a summary of previous planning level surveys and predictive models. For specific archaeological surveys, include language in task orders for use of the cultural landscape approach and existing predictive models during surveys and to include a conclusion in the report about the accuracy of the model. Areas surveyed and survey results should also be illustrated in a GIS layer.

Development of an WAARNG lands statewide predictive model will require, at a minimum, the expertise of an archaeologist and a GIS technician with tribal consultation. A simple model can be developed using the established parameters or criteria for each region provided in the State Historic Preservation Plan (<http://www.dahp.wa.gov/sites/default/files/PreservationPlan09.pdf>), as well as plotting areas of previous disturbance. These parameters can be located on a map and predictive ratings assigned. It is recommended that a GIS layer be developed for this model. In most cases, the models will not replace the requirement for surveys, but as more data are collected about actual archaeological or cultural site distribution, these models can be tested and refined to assist with planning, reduce the level or amount of surveying, and provide a more effective use of program funding. Also, each year additional surveys on or near WAARNG property could be conducted, new discoveries could be made, and information and theories developed regarding former inhabitants and their life ways. The GIS must be updated as new information becomes available to stay current and remain a useful manager tool. Therefore, the model will need periodic review to determine its validity and keep data current.

Archaeological Inventories and Evaluations

Inventories and evaluations are a required step for undertakings and compliance with Section 106 of the NHPA – undertakings on federal property (lands or buildings) or state property with federal actions (such as funding or permits). Results can be integrated with the NEPA process as needed but, in most cases, archaeological work must be initiated at the earliest planning phase of any project that has the potential to affect archaeological properties. Testing and excavations are more involved processes, and are generally used to further define an archaeological site and mitigate for adverse effects. For Section 106 compliance surveys, identifying the area of potential effect (APE) for a project and scoping of the survey or evaluation effort should be coordinated with the SHPO and any interested Tribes. Section 110 survey and evaluation efforts can also be coordinated with the SHPO and interested Tribes, to help identify priority areas for investigation, applicable research questions to be investigated, and methodology to be applied. Archaeological surveys must be conducted by qualified personnel, see section I.1.5.

Note: federal funding cannot be used for archaeological inventories on lands being acquired with state funds.

The following are very general definitions that apply to archaeological inventories:

Constraints analysis: A constraints analysis is completed when a party is interested in knowing what might be on a property in the most general way. A record search/literature search with sometimes a field visit for reconnaissance is conducted. A letter report is prepared to document overall impressions and concerns with recommendations, as appropriate. This type of analysis is also referred to as a reconnaissance survey, Phase Ia (eastern U.S.), or Class I (western U.S.). Check with the SHPO for levels of analysis and surveys and survey requirements.

Survey: Survey involves a record search/literature review, systematic coverage of a property, recording or updating of all discovered sites, and a report. Surveys sometimes involve some excavation depending on the level of information that is needed or state requirements. Excavation can be shovel scrapes or shovel test pits. Surveys can be collection or non-collection. Federal agencies generally prefer non-collection surveys. Collection requires cataloguing and additional maps for the sites that are complex and require curation (see section J.2.6).

Generally, a survey involves preparation of a work plan that describes how the work will be done and by whom. The survey interval is generally between 5 to 20 meters between team members and depends on terrain, vegetation coverage, and resources types. All sites located during a survey have to be recorded and mapped. A general assessment of the kind of site it is and perhaps the overall potential of the site can be suggested after a survey.

The survey report provides an environmental setting, culture history, a description of the site, methodologies, research questions, survey results, recommendations, and any additional state requirements. All discovered sites are treated as eligible for listing on the NRHP until determination of eligibility is final (see evaluation below). Recommendations are crafted based on a proposed project or action. If there are no immediate plans for a property, recommendations might include avoiding the site. These surveys are often referred to also as Phase I and Phase II. Check with the SHPO for levels of surveys and survey requirements.

Evaluation: Evaluation or testing of sites is extremely variable. There are guidelines for sparse lithic scatters that allow this type of site to be addressed in an expedient manner; however, for other site types there are a number of approaches. Many tests involve shovel test pits, shovel scrapes, drill holes, and sample excavation units with surface mapping, collection, and special studies. The number of units will vary greatly depending on the size of the site and how many units will be necessary to analyze the sections of the site that are not subjected to units, gather information to address research questions, and make conclusions about the site.

Upon completion of excavation, a report is prepared to summarize the testing and make a recommendation of eligibility.

Data Recovery: If a historic property will be impacted by an action or undertaking, there must be mitigation, and data recovery is a form of mitigation for archaeological sites. Data recovery requires preparation of an action/work plan, which describes the site, what information is hoped to be gained by the data recovery, study questions, sample design, catalog methods, special studies, and report preparation. This plan is carefully reviewed by the SHPO or state archaeologist and Tribes prior to field efforts. Data recovery efforts vary greatly in size and scope. The approach to a data recovery depends greatly on the site, geographic location, type of project, archaeologist, and timing. All collected items from federal land must be curated in a federally approved facility.

Procedures: Ensure that the scope of work clearly defines the type of survey or excavation; federal and state regulations to be met; the project objectives; a description of the deliverables, including GIS; and qualifications for those performing the work.

Determine if permits are necessary. Stakeholders always include Tribes.

Archaeological Permits

In some instances, archaeological investigations may require federal or state permits. The most common categories of permits are described below.

Archaeological Resources Protection Act Permits. ARPA permits are required when the following three criteria are met:

The project is on federal land

Digging or collection of artifacts will occur

The participants are not directly contracted to or by the WAARNG.

ARPA permits for archaeological investigations that could result in the excavation or removal of American Indian human remains and other cultural items as defined in NAGPRA, or in the excavation of archaeological resources that are of religious or cultural importance to federally recognized tribes and Native Hawaiian organizations, will be issued in accordance with AR 405-80 and AR 200-1. The WAARNG supporting U.S. Army Corps of Engineers (USACE) District Real Estate Office will issue the permit after the WAARNG commander conducts consultation in accordance with 43 CFR 10.5 and 32 CFR 229.7 with the culturally affiliated Indian tribes. The WAARNG commander provides the USACE district with approval to issue the permit by means of a report of availability prepared after necessary consultation and compliance actions have been met. ARPA permits shall provide for the disposition of NAGPRA cultural items in accordance with NAGPRA subsections 3(a) and 3(b) and 43 CFR 10. The WAARNG commander will ensure that documentation of consultation with culturally affiliated Indian tribes is prepared and maintained as part of the record of each such permit.

The WAARNG will ensure that ARPA permits:

1. Comply with the requirements of 32 CFR 229, 43 CFR 10
2. Require that any interests that federally recognized tribes or Native Hawaiian organizations have in the permitted activity are addressed in a manner consistent with the requirements of the NHPA and NAGPRA prior to issuance of the permit
3. Require that permitted activities be performed according to applicable professional standards of the Secretary of the Interior
4. Require that the excavated archaeological artifact collection and associated records are permanently curated in a curation facility that meets the requirements of 36 CFR 79.

Archaeological resources, objects of antiquity, and significant scientific data from federal installations belong to the installations, except where NAGPRA requires repatriation to a lineal descendant, federally recognized tribe, or Native Hawaiian organization. Archaeological resources, objects of antiquity, and significant scientific data from nonfederal land belong to the state, territory, or landowner. Such resources from lands used by the WAARNG, but for which fee title is held by another agency, are the property of the agency designated as the land manager in the land-use instrument (e.g., public land order, special use permit). WAARNG commanders should ensure that land use instruments allowing for military use are reviewed to determine proper roles and responsibilities.

WAARNG staff or contractors carrying out official duties associated with the management of archaeological resources who meet the professional qualifications and whose investigations meet the requirements of 32 CFR 229.8 are not required to obtain a permit under ARPA or the Antiquities Act for the investigation of archaeological resources on a federally owned or controlled installation, including situations where cultural items as defined by NAGPRA could be excavated.

However, in situations where NAGPRA cultural items or NHPA historic properties could be encountered during intentional excavation of archaeological resources, the requirements of NAGPRA and 43 CFR 10, and NHPA and 36 CFR 800 must be met prior to such archaeological excavations.

For the purposes of WAARNG compliance with ARPA, the WAARNG commander is considered the federal land manager as defined in 32 CFR 229.3(c). As the federal land manager, the WAARNG commander may determine that certain archaeological resources in specified areas under his jurisdiction, and under specific circumstances, are not or are no longer of archaeological interest and are not considered archaeological resources for the purposes of ARPA (in accordance with 32 CFR 229.3(a)(5)). All such determinations shall be justified and documented by memorandum and shall be formally staffed for review through the ARNG to HQDA prior to final determination. HQDA uses technical and legal guidance from AEC to review the draft document.

The WAARNG commander will ensure that military police; installation legal staff; the installation PAO; and the fish, game, and recreation management staff are familiar with the requirements and applicable civil and criminal penalties under ARPA. Also in accordance with ARPA Section 9, the WAARNG commander may withhold information concerning the nature and location of archaeological resources from the public under Subchapter II of Chapter 5 of Title 5 of the *United States Code* or under any other provision of law. ARPA permits can take up to 6 months to acquire.

State Agency Permits. In the State of Washington any alteration to an archaeological site requires a permit from DAHP per [RCW 27.44](#) and [RCW 27.53](#). Alterations to a site can include adding fill to an existing archaeological site, building upon an archaeological site, removing trees from a site, using heavy equipment on a site, compacting a site, or other activities that would change the site. Alterations also include formal archaeological excavation, removal, and collection of archaeological materials, and the excavation and removal of Native American human remains. Permits are also required to remove or excavate historic archaeological resources that are eligible or listed in the National Register of Historic Places or to recover any submerged historic aircraft or historic shipwrecks, or remove any archaeological object from such sites. The complete permit requirements can be found in the [Washington Administrative Code 25-48-060](#). In addition to submitting a signed and notarized application, there are 21 potential sections for a complete permit application, depending on the type of resource, nature of excavation or recovery, and land ownership.

I.2.2 Inadvertent Discoveries

Inadvertent Discovery of Human Remains or Funerary Objects – Native American Graves Protection and Repatriation Act

In the event of discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony, the CRM will ensure that all appropriate measures are implemented to protect the remains and any other protected cultural items; all appropriate tribes and agencies will be promptly notified of the find, and all applicable federal, tribal, and state procedures will be followed.

For ground-disturbing activities, project planners, engineers, soldiers, tenants, and construction personnel should be informed of types of cultural resources potentially existing at the WAARNG site or training installation, and they should be briefed on the provisions in SOP 5.

Prior to field troops, construction crews, or non-WAARNG personnel commencing activities at any WAARNG property, they should be briefed on the following procedures (flowchart provided in **Figure I-1**).

1. Ensure that activities have ceased at the discovery site and that the site has been secured from human and natural forces.
2. Notify the SHPO of the discovery. This notification should be by telephone, to be followed immediately by written notification.

3. If human remains are known or suspected to be present, also promptly notify the state police and medical examiner, and if federal property, the FBI. Notify the WAARNG JAG, operations manager in the Directorate of Operations (DSCOPs), and PAO.
4. Visit the location of the discovery within 24 hours of the find. The services of appropriate technical experts (e.g., archaeologists, specialists in human osteology, forensic anthropologists) may be retained to participate in the field visit.
5. If the CRM has reason to believe that American Indian human remains, funerary objects, sacred objects, or objects of cultural patrimony have been discovered, the CRM must provide immediate telephone notification of the discovery, along with written notification by certified mail, to ARNG.
6. If known, as much information as possible concerning the cultural resource (such as type, date, location, any indicators of ethnicity, and circumstances of the discovery) should be provided to ARNG. ARNG, in consultation with the WAARNG and appropriate interested parties, will determine the significance and origin of the remains.
7. The CRM will obtain certification of notification from ARNG. Federally recognized tribes and Native Hawaiian organizations would be notified by telephone with written confirmation within 3 days after certification. This notification must include pertinent information as to kinds of human remains, funerary objects, sacred objects, or objects of cultural patrimony, their condition, and the circumstances of discovery.
8. The CRM will follow NAGPRA procedures and consult with interested parties (SHPO, Tribes, property owner) to discuss disposition of remains and mitigation measures. The CRM, in consultation with the SHPO and American Indian groups, as appropriate, will determine the procedures for disposition and control of any American Indian cultural items excavated or removed as a result of inadvertent discoveries.

Activities in the area of discovery will resume 30 days after certification of notification is received, or sooner, if a signed binding agreement is reached. Keep the PAO informed throughout the process. Phone numbers and the names of contacts are provided in **Appendix E**. Before the original action can resume, ARNG must approve that the NAGPRA process has been implemented properly and that the WAARNG is in a legal position to proceed with the project in the area of discovery

One management tool is for the WAARNG to develop a cooperative agreement prior to the encounter of a burial to agree upon procedures and streamline the process.

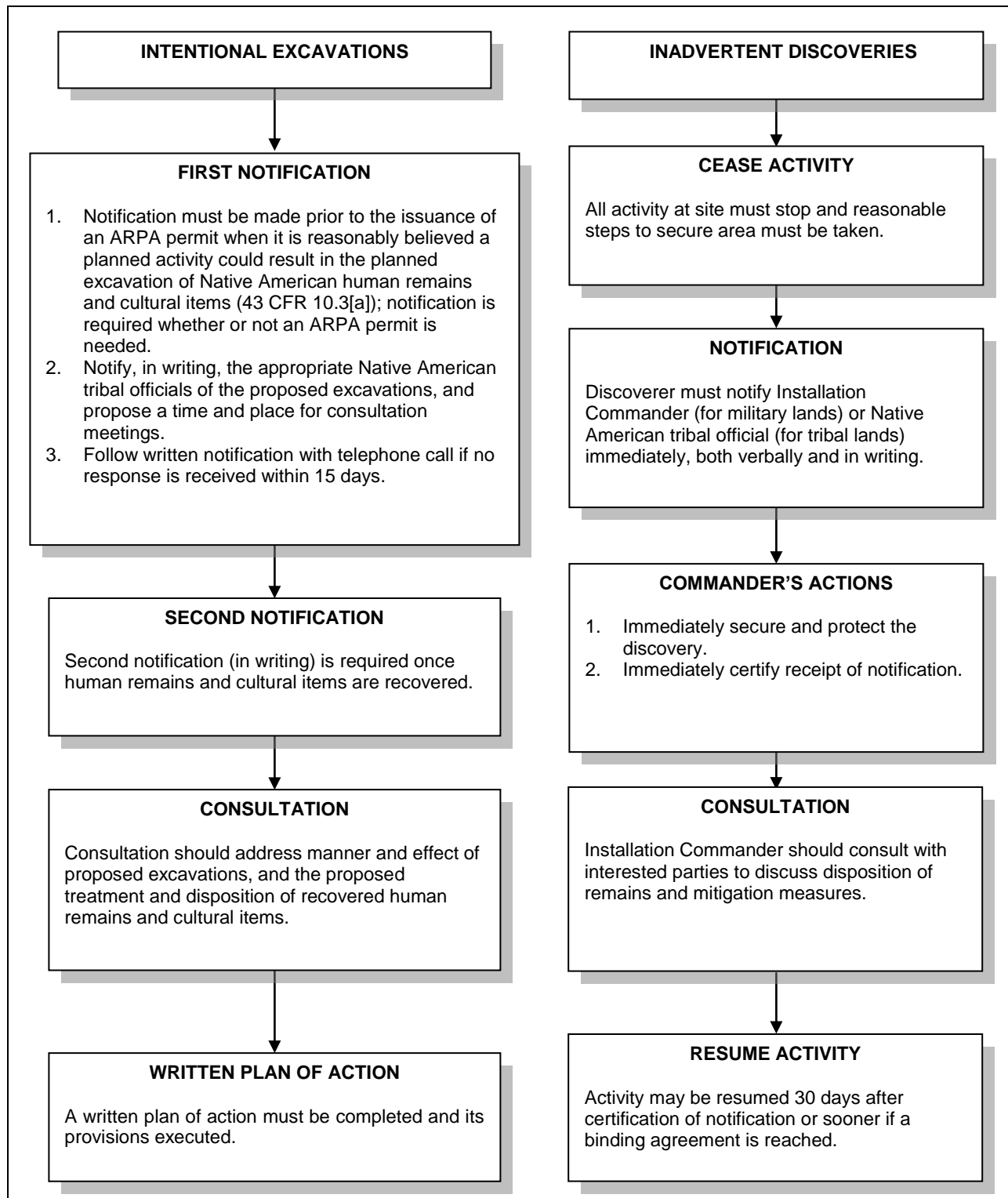


Figure I-1. Policies for Archaeological Excavation under Native American Graves Protection and Repatriation Act 25 USC 3001-3013

Inadvertent Discovery of Archaeological Artifacts

The CRM shall ensure that, in the event of the inadvertent discovery of archaeological resources (excluding items covered under NAGPRA), measures are taken promptly to protect the find from disturbance, assess the significance of the discovery, and implement appropriate mitigative measures for significant resources.

1. Ensure that activities have ceased at the discovery site, and that the site has been secured from human and natural forces.
2. The CRM will promptly notify the SHPO of the discovery.
3. Begin recording the site if the site can be avoided.
4. Prepare full documentation of the resource and a report summarizing the results of the investigation. This documentation and the report will be submitted to the SHPO and Tribes.

I.2.3 Curation

[Note: AR 200-1, 2-7 (a) and (b) – The installation commander will ensure that all collections are possessed, maintained, and curated in accordance with the requirements of 36 CFR 79. Generally, installations should not establish archaeological curation facilities on the installation due to the permanent recurring costs and personnel requirements to maintain such repositories to the minimum standards in 36 CFR 79 in perpetuity].

In accordance with the requirements of 36 CFR 79, *Curation of Federally Owned and Administered Archaeological Collections*, AR 200-1 requires TAG of the ARNG to ensure that all archaeological collections and associated records, as defined in 36 CFR 79.4(a), are processed, maintained, and preserved.

Collections are 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 (36 CFR 79.4[a]).

Associated records are original records (or copies thereof) that are prepared or assembled, that document efforts to locate, evaluate, record, study, preserve, or recover a prehistoric or historic resource (36 CFR 79.4([2])).

The CRM should consider long-term and the ongoing cost of permanent collection curation and include this in the budgets for archaeological investigation projects in STEP.

Collections from federal lands should be deposited in a repository that meets the standards outlined in 36 CFR 79, to ensure that they will be safeguarded and permanently curated in accordance with federal guidelines. Collections from state owned property that have title vested in the WAARNG should be curated in facilities that meet the requirements of the SHPO.

A curation facility is specifically designed to serve as a physical repository where collections and records are sorted, repackaged, assessed for conservation needs, and then placed in an appropriate, environmentally controlled, secure storage area. Proper curation also includes a review and update of all paper records. An important component of artifact curation is the selection of artifacts for site-specific reference collections. 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 cultural resource collections and documents for use by members of the public interested in the archaeology and history of the region.

Procedures:

- *Before permanent curation, all artifacts recovered on WAARNG sites and training installations will be analyzed using commonly accepted methods for artifacts in the region. Artifact analyses will be consistent with current archaeological research objectives for the region.*
- *Cleaning, curation, and storage of artifacts and associated documents will meet professional standards.*
- *Artifacts and associated documents will be stored in clean, spacious, temperature-controlled facilities while on the installation and kept in archival-quality bags, folders, or boxes.*
- *The WAARNG may choose to negotiate a memorandum of understanding (MOU) or similar agreement with the SHPO or other state repository, museum, or university; or other approved curation facility for final curation of all artifacts.*
- *All field, laboratory, and other project records will be reproduced on archival-quality paper.*

36 CFR 79 Reporting and Inspection Requirements

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 held by the WAARNG installation or curated on its behalf at a curation facility.

Inspections of federally curated archaeological collections shall be conducted periodically in accordance with 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

- *Maintain a list of any U.S. Government-owned personal property (i.e., artifacts, documents, as defined in 36 CFR 79) received by the CRM*
- *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.*

I.2.4 Records Management

The proper management of official records is Army policy and typically a mandated function of the WAARNG historian, if one has been assigned. It is important that the CRM be cognizant of Army records management programs, though, because the custodianship of historical records can fall to the CRM or an associated office. Also, the CRM holds unique cultural resources-related records that are not represented in other facets of the installation. The preservation of these records is important.

Due to the fact that the WAARNG is in the unique position of having both state and federally mandated roles, the management of both state and federal records is discussed below.

Federal Records

Army records management policy is set forth in various documents. Secretary of the Army Memorandum of 22 February 2005: *Preservation of Army Records* states that “[o]fficial records of the US Army are of

enduring significance for ensuring complete, accurate, and objective accounting of the Army's activities" and "all elements of the US Army must ensure that official records of both peacetime and wartime activities are preserved." Moreover, the preservation of agency records and their management is stipulated in federal regulations in 44 U.S.C. Chapters 21, 29, 31, 33, and 101.

Records management requirements are delineated in AR 25-1, *Army Knowledge Management and Information Technology*, and AR 25-400-2; the Army Records Information Management System (ARIMS). A Web site dedicated to ARIMS is located at: <https://www.arims.army.mil/arimsnet/site/aersmain.aspx>. There are three avenues through which the WAARNG CRM can ensure the protection of important records.

First, if an installation records officer exists, the WAARNG should contact this individual to develop a records management program for the records generated and stored by his/her office and make sure that the cultural resources program records are managed in such a way that they comply with installation and Army policy.

Second, there are a variety of other sources for guidance if an installation records officer does not exist. Within the Army these include the Army Records Management and Declassification Agency (RMDA) whose mission is to provide oversight and program management for the Army's Records Management Program, along with establishing programs for records collection and operating and sustaining the Army electronic archives.

The Records Management and Declassification Agency can be contacted at rmda@rmda.belvoir.army.mil. The division's Web site can be accessed at: <https://www.rmda.belvoir.army.mil/rmdaxml/>. The Army records officer will be able to provide direction on the management of WAARNG records. Contact information is

Department of Defense
Department of the Army
Army Records Management Division
ATTN: AHRC-PDD-R
Casey Building, Room 102
7701 Telegraph Road
Alexandria, VA 22315-3860

Third, the National Archives and Records Administration has a very active program in which they assist agencies in developing record management programs that help to ensure the conservation and eventual archiving of important records while considering mission needs and other circumstances. The WAARNG CRM can contact the College Park, Maryland, branch of the National Archives and Records Administration to assist in the appraisal and management of the WAARNG records under his/her control.

State Records

State records fall into two categories, those that are maintained by the WAARNG historian and those that are transferred to the State Archives. The WAARNG historian can provide guidance on what types of records are archived by each agency. The state's records management statutes are codified in the list of state's laws shown below. The state program is similar to the federal program, but applies to state records. The State Archives provide technical assistance to agencies so that they can meet legal, fiscal, and administrative functions for records retention.

State and local government agencies are to comply with the laws and rules developed for public records in the State of Washington. The following are the existing statutes relating to the protection and preservation of public records:

Revised Code of Washington (RCW)

- 40.10 Essential Records
- 40.14 Preservation and Destruction of Public Records
- 40.16 Penal Provisions for the Intentional Destruction of Public Records
- 40.20 Reproduced Records
- 42.56 Public Records Act (*Public Disclosure – responsibility of the Attorney General’s Office*)

Washington Administrative Code (WAC)

- 434-600 Promulgation
- 434-610 Definitions
- 434-615 Custody of Public Records
- 434-620 Powers and Duties (State Archivist)
- 434.624 Powers and Duties (State Records Committee)
- 434-626 Powers and Duties (State Agency Records Officers)
- 434-630 Powers and Duties (Local Records Committee)
- 434-635 Local Records Disposition Authority
- 434-640 Methods of Records Disposal
- 434-660 Standards for Public Records
- 434-662 Preservation of Electronic Records
- 434-663 Imaging Systems (Standards)
- 434-670 Local Records Grants Program
- 434-677 Security Microfilm (Standards)
- 434-690 Archives (Public Records Access)

The Revised Code of Washington and the Washington Administrative Code are available online:
<http://www.leg.wa.gov/LawsAndAgencyRules/>.

I.2.5 Historic Structures

A building is created principally to shelter any form of human activity. “Building” can also be used to refer to a historically and functionally related unit, such as a courthouse and jail or a house and barn. Buildings eligible for the NRHP must include all of their basic structural elements. Parts of buildings, such as interiors, facades, or wings, are not eligible independent of the rest of the existing building. The whole building must be considered, and its significant features must be identified.

The term “structure” is used to distinguish those constructions created for functions other than human shelter. Structures nominated to the NRHP must include all of the extant basic structural elements. Parts of structures cannot be considered eligible if the whole structure remains. For example, a truss bridge is composed of the metal or wooden truss, the abutments, and supporting piers, all of which, if extant, must be included when considering the property for eligibility.

Buildings and structures of historic age, which is considered to be 50 years or older, should be inventoried and evaluated. An inventory is generally a physical documentation of the building that includes construction date, original and current function, a physical description of the building or structure and its current condition, and description of changes over time. The evaluation is to determine the significance of the building or structure and if it is eligible for listing in the NRHP. Generally, the inventory and evaluation are conducted concurrently.

Evaluations are conducted using NRHP criteria, as listed in 36 CFR 60.4. To be listed in, or considered eligible for, the NRHP, a cultural resource must meet at least one of the four following criteria:

- *The resource is associated with events that have made a significant contribution to the broad pattern of history (Criterion A)*
- *The resource is associated with the lives of people significant in the past (Criterion B)*

- *The resource embodies distinctive characteristics of a type, period, or method of construction; represents the work of a master; possesses high artistic value; or represents a significant and distinguishable entity whose components might lack individual distinction (Criterion C)*
- *The resource has yielded, or might be likely to yield, information important in prehistory or history (Criterion D).*

In addition to meeting at least one of the above criteria, a cultural resource must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. **Integrity** is defined as the authenticity of a property's historic identity, as evidenced by the survival of physical characteristics it possessed in the past and its capacity to convey information about a culture or group of people, a historic pattern, or a specific type of architectural or engineering design or technology.

Location refers to the place where an event occurred or a property was originally built. Design considers elements such as plan, form, and style of a property. Setting is the physical environment of the property. Materials refer to the physical elements used to construct the property. Workmanship refers to the craftsmanship of the creators of a property. Feeling is the ability of the property to convey its historic time and place. Association refers to the link between the property and a historically significant event or person.

Certain kinds of properties are not usually considered for listing in the NRHP, including

- *Religious properties (Criterion Consideration A)*
- *Moved properties (Criterion Consideration B)*
- *Birthplaces or graves (Criterion Consideration C)*
- *Cemeteries (Criterion Consideration D)*
- *Reconstructed properties (Criterion Consideration E)*
- *Commemorative properties (Criterion Consideration F)*
- *Properties that have achieved significance within the past 50 years (Criterion Consideration G).*

These properties can be eligible for listing only if they meet special requirements, called Criteria Considerations (see above). A property must meet one or more of the four Criteria for Evaluation (A through D) and also possess integrity of materials and design before it can be considered under the various Criteria Considerations.

Historic Districts. Sites or structures that might not be considered individually significant could be considered eligible for listing on the NRHP as part of a historic district. According to the NRHP, a historic district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects that are historically or aesthetically united by plan or physical development.

A district derives its importance from being a unified entity, even though it is often composed of a wide variety of resources. The identity of a district results from the interrelationship of its resources, which can convey a visual sense of the overall historic environment or be an arrangement of historically or functionally related properties. For example, a district can reflect one principal activity, such as a mill or a ranch, or it can encompass several interrelated activities, such as an area that includes industrial, residential, or commercial buildings, sites, structures, or objects. A district can also be a grouping of archaeological sites related primarily by their common components; these types of districts often will not visually represent a specific historic environment.

A district can comprise both features that lack individual distinction and individually distinctive features that serve as focal points. It can even be considered eligible if all of the components lack individual

distinction, provided that the grouping achieves significance as a whole within its historic context. In either case, the majority of the components that add to the district’s historic character, even if they are individually undistinguished, must possess integrity, as must the district as a whole.

A district can contain buildings, structures, sites, objects, or open spaces that do not contribute to the significance of the district. The number of noncontributing properties a district can contain yet still convey its sense of time and place and historical development depends on how these properties affect the district’s integrity. In archaeological districts, the primary factor to be considered is the effect of any disturbances on the information potential of the district as a whole.

A district must be a definable geographic area that can be distinguished from surrounding properties by changes such as density, scale, type, age, style of sites, buildings, structures, and objects; or by documented differences in patterns of historic development or associations. It is seldom defined, however, by the limits of current parcels of ownership, management, or planning boundaries. The boundaries must be based upon a shared relationship among the properties constituting the district.

Department of Defense Historic Status Codes

In 2005, in response to the requirements of EO 13327, DoD introduced the Historic Status Codes used to identify real property assets on the NRHP or facilities that should be evaluated for NRHP eligibility. This list was subsequently updated in 2007. **Table I-3** provides a list and explanation of the DoD Historic Status Codes.

Table I-3. DoD Historic Status Codes

Code	Title	Definition
NHLI	Individual National Historic Landmark	An individual facility that is individually listed on the NRHP and has been further declared and NHL by the Secretary of the Interior due to its prominent importance in our Nation’s history. The designation of an NHL is coordinated by the Secretary of the Interior in consultation with the Federal Preservation Officer (FPO).
NRLI	Individual National Register Listed	An individual facility that has been determined to meet the National Register criteria of eligibility, and has been formally listed in the NRHP by the Keeper of the National Register. The formal evaluation and nomination process of individual facilities involves the review, approval, and signature of the FPO, SHPO, or THPO (as appropriate), and the Keeper of the National Register.
NREI	National Register Eligible - Individual	A facility that is determined to meet the National Register criteria of eligibility but that has not gone through the formal nomination process. An eligible facility is treated the same as a facility listed in the NRHP pursuant to the NHPA and 36 CFR 800 “Protection of Historic Properties.” Facilities are determined to be eligible for listing in the NRHP through installation determinations as concurred with by the SHPO or THPO (as appropriate), or by a formal determination of eligibility from the Keeper of the National Register.
NCE	Non-Contributing Element of NHL/NRL/NRE District	Facilities within the designated boundaries of a National Historic Landmark District or NRHP listed or eligible District that have been evaluated and determined not to contribute to the historic or architectural significance of the District.

Code	Title	Definition
DNE	Determined Not Eligible for Listing	A facility that has been evaluated using the National Register criteria and is determined not to meet any of the requirements for eligibility. This determination is carried out by the installation staff in consultation with the SHPO or THPO (as appropriate).
NEV	Not Yet Evaluated	A facility that has not yet been evaluated for historic status.
DNR*	NHLI/NHLC/NREI/NREC National Register Property – Designation rescinded	A facility formerly classified as NHLI/NHLC/NREI/NREC that has been determined by the Keeper of the National Register to lack sufficient integrity to maintain its eligibility as a historic property. The formal removal process of NREI/NREC properties involves the review, approval, and signature of the FPO, SHPO, or THPO (as appropriate), and the Secretary of the Interior.
NHLC	National Historic Landmark District – Contributing element	An individual facility that is identified as a contributing element of a District listed in the NRHP and also designated an NHL District by the Secretary of the Interior. The designation of an NHL is coordinated by the Secretary of the Interior in consultation with the FPO.
NRLC	National Register Listed District – Contributing element	An individual facility that is identified as a contributing element of a District formally listed in the NRHP. The formal evaluation and nomination process of contributing elements involves the review, approval, and signature of the FPO, the SHPO, or THPO (as appropriate); and the Keeper of the National Register.
NREC	National Register Eligible District – Contributing Element	An individual facility that is identified as a contributing element of a larger District determined eligible for listing in the NRHP. An eligible District is treated the same as a District listed on the NRHP, pursuant to the NHPA and 36 CFR 800 “Protection of Historic Properties.” The evaluation of contributing elements is carried out by the installation in consultation with the SHPO or THPO (as appropriate), or by an official determination of eligibility from the Keeper of the National Register.
ELPA*	Eligible for the purposes of a Program Alternative	An individual facility that is treated as eligible for listing in the NRHP by consensus of the FPO, SHPO, or THPO (as appropriate); and the ACHP during development of a Program Alternative (Comment) as defined in 36 CFR 800 “Protection of Historic Properties,” section 14: “Federal Agency Program Alternatives.” An example includes all Capehart-Wherry housing, determined eligible for the purposes of a 2002 Program Comment process.

*NOTE: The codes DNR and ELPA are reserved for ARNG Headquarters use only.

Maintenance and Care of Historic Buildings and Structures

Under Section 106 of the NHPA (see **Appendix I**), the following actions have the potential to have an adverse effect on buildings and structures that are eligible for or listed in the NRHP:

- *Operations and maintenance*
- *Renovations and upgrades*
- *Demolition or replacement, or relocation*
- *Property lease, transfer, or sale.*

This requirement applies to undertakings on federal property (lands or buildings) or state property with federal actions (such as funding or permits). Actions on state property (i.e., readiness centers [armories]) with no federal component do not require NHPA compliance; however, check state and local laws (**Appendix H**).

Upon being advised by the project proponent of proposed operations or maintenance activities, renovations or upgrades, demolition, transfer, replacement, relocation, or sale or lease of property that might affect a property which is 45 years old or older and has an undetermined historic status, the CRM must determine its eligibility for the NRHP. If the property is determined eligible, the project represents an undertaking that has the potential to effect historic properties and must be reviewed under Section 106 of the NHPA. CRMs must also review projects involving ground disturbance (landscaping, utility excavations, building demolition or construction) to determine the potential for the project to affect archaeological sites.

The following maintenance and repair activities, **when conducted as part of a federal undertaking**, are determined to have no adverse effect on historic properties and, under the Nationwide Readiness Center PA (currently in Draft), will be exempted from further Section 106 review. **It must be remembered that use of this exemption list does not negate the need for the CRM to review project to determine whether the exemption(s) apply.** Non-federal actions involving state-owned buildings are not subject to review under Section 106, but may require review under state laws.

Note: If the building is part of a local historic district, local zoning ordinances and historic preservation ordinances could restrict these actions or require local approval.

1. Exterior:

- Painting on previously painted surfaces using similar color
- Paint removal by nondestructive means that will not affect the historical fabric of the building
- Repair or replacement of existing walkways with like materials
- Repair or replacement of existing parking areas within the existing footprint and not involving lighting and landscaping changes associated with parking area
- Repair or replacement of existing above ground fuel storage facilities
- Placement of temporary barriers for compliance with DoD Minimum Antiterrorism Standards for Buildings (UFC 4-010-01 8 October 2003)
- Repair of the building exterior when repair or replacement matches existing details, form, and materials.

2. Interior:

- Replace insulation (ceilings, attics, basement spaces, walls, plumbing pipes, hot water heaters, and ductwork) when only the insulation material is physically affected
- Replace non-historic or character defining plumbing as defined in the original determination documentation when only the insulation material is physically affected
- Replace non-historic or character defining heating, ventilation, and air conditioning systems and units as defined in the original determination documentation when only such systems are physically affected
- Replace electrical systems without altering historic fabric
- Replace telecommunications equipment as defined in the original determination documentation when only such equipment is physically affected
- Replace security systems as defined in the original determination documentation when only such systems are physically affected

- Replace fire suppression systems as defined in the original determination documentation when only such systems are physically affected
- Asbestos removal and abatement when it does not involve removal of the historic fabric of buildings and structures as defined in the original determination
- Nondestructive lead paint abatement when it does not involve removal of historic fabric other than paint.

It must be remembered that use of this exemption list does not negate the need for the CRM to review projects. There are guidelines for the treatment and preservation of historic properties contained in *The Secretary of the Interior's Standards for the Treatment of Historic Properties*. The standards can be viewed on the Internet at <http://www2.cr.nps.gov/tps/tax/rhb/index.htm>.

Maintenance and Treatment Plans

A maintenance and treatment plan can be developed as a component of the cultural resources management program and in some cases used to comply with Section 106 of the NHPA. A Maintenance and Treatment Plan (MTP) identifies the historic properties (buildings, structures, landscapes, and districts), their character defining features and contributing elements, building materials and condition, and promotes the preservation of these resources through planning, design, cyclic maintenance, and appropriate treatments for repair, rehabilitation, and restoration. An MTP is a 5-year management plan that provides guidance to the CRMs. The CRMs in turn use this information to work with the maintenance and facilities personnel working with historic structures to address problems of deterioration or failure of building materials and systems and addresses repair and renovation materials that will continue to maintain historic significance of the historic property.

An MTP covers a grouping of buildings that is generally site-specific due to the complexity of each site and overlaying construction periods, and should focus on a range of alternatives and treatments from stabilization to restoration.

Disposal or Demolition of Excess Property

Mission requirement changes sometimes result in the removal, replacement, or disposal of buildings and structures. These actions can have an effect on a historic property under Section 106 of the NHPA. When buildings are to be removed, replaced, or disposed of, determine if the building is 50 years old and has been evaluated for eligibility to be listed in the NRHP. If the building is 50 (or near 50) years old, initiate the Section 106 process (see Appendix I). If necessary, evaluate the building for eligibility. **It should be noted that transfers of property between federal agencies or transfers of property from a state agency to anyone are not considered undertakings with the potential to adversely affect historic properties; accordingly, these actions are not typically subject to Section 106 review.**

If removal or replacement is being considered, conduct an economic analysis on replacement of the building. When rehabilitation costs exceed 70 percent of a building's replacement cost, replacement construction can be used. However, "the 70% value may be exceeded where the significance of a specific structure warrants special attention if warranted by the life-cycle cost comparisons".

If the projects will affect an eligible property, mitigation measures can be developed that reduce effects to a non-adverse level. The measures might include avoidance, preservation in place, rehabilitation, or data recovery. If data recovery is chosen, it is suggested that HABS or Historic American Engineering Record (HAER) documentation be prepared prior to implementation of any activity that could affect the character or integrity of the historic district. The SHPO or NPS Regional Office, in coordination with the WAARNG, would select the acceptable level of documentation for mitigation purposes.

Even if the building itself is not historic, but is within a historic district, replacement could have an adverse effect on the historic district. If this is the case, consult with the SHPO. If the building to be removed is in,

or a contributing element to, a historic district, the goals are to retain the character-defining features, design, and workmanship of buildings, structures, and landscape. If mission requirements cause the demolition and replacement of significant buildings or structures, the replacement design should be compatible with other buildings within and contributing to the historic district. Changes to the landscape should convey the historic pattern of land use, topography, transportation patterns, and spatial relationships.

Force Protection and Antiterrorism Standards

The intent of DoD Minimum Antiterrorism Standards for Buildings (UFC 04-010-01) is to minimize the possibility of mass casualties in buildings or portions of buildings owned; leased; privatized; or otherwise occupied, managed, or controlled by or for WAARNG. These standards provide appropriate, implementable, and enforceable measures to establish a level of protection against terrorist attacks for all inhabited ARNG buildings where no known threat of terrorist activity currently exists. The standards apply to any WAARNG building that uses federal funding for new construction, renovations, modifications, repairs, restorations, or leasing and that meets the applicability provisions will comply with these standards (section 1-6 of Standards, also see exemptions, section 1-6.7). In general, it is applicable to inhabited buildings routinely occupied by 50 or more DoD personnel.

The overarching philosophy of this policy is that an appropriate level of protection can be provided for all WAARNG personnel at a reasonable cost. The philosophy of these standards is to build greater resistance to terrorist attack into all inhabited buildings. The primary methods to achieve this outcome are to maximize standoff distance, to construct superstructures to avoid progressive collapse, and to reduce flying debris hazards.

Implementation of this policy, however, shall not supersede the WAARNG's obligation to comply with federal laws regarding cultural resources to include the NHPA and ARPA. WAARNG personnel need to determine possible adverse effects on a historic structure or archaeological resource prior to antiterrorism standard undertakings and consult accordingly. Conversely, historic preservation compliance does not negate the requirement to implement DoD policy.

In a project sponsored by the DoD Legacy Resources Management Program, the U.S. Army Construction Engineering Research Laboratory (USACERL) conducted a study to identify common circumstances in which UFC 4-010-01 undertakings would conflict with the requirements of the NHPA, and develop specific guidelines that would help installation command, AT, cultural resources, and facilities personnel to rapidly resolve those conflicts in a way that satisfies both sets of requirements. The final technical report, available at https://www.denix.osd.mil/denix/Public/Library/NCR/Documents/RPT_03-176.pdf, interprets UFC 4-010-01 and presents technologies commonly used for UFC compliance. It also identifies AT undertakings that may conflict with the Secretary of the Interior's rehabilitation standards and suggests ways to satisfy dual AT/HP requirements.

The report, **Antiterrorism Measures for Historic Properties** (Webster *et al.*2006), proposes guidelines for making historic buildings compliant with UFC 4-010-01, while also meeting or being in the spirit of the Secretary of the Interior's Rehabilitation Standards. A number of recommendations are suggested by the authors, including the following:

- *Consider broader environment of base and beyond in assessing needs and designing solutions*
- *Consider historic building's building materials, structural design, and component in assessing needs and designing solutions*
- *Consider building use and functions within it in assessing needs and designing solutions*
- *Integrate security measures in siting and landscaping of historic building. Low retaining walls, decorative fences, trees and vegetation, boulders, and street furniture can serve security benefit.*

The decision to demolish a historic building rather than attempting to retrofit it must be justified with a cost analysis and discussion of alternatives examined.

Economic Analysis

The WAARNG is required to conduct an economic analysis of historic buildings and structures that are being considered for demolition and replacement (AR PAM 200-1 section 2-4G(1)(2)). The NHPA requires that historic buildings and structures be reused to the maximum extent possible. However, this must be justified through a life-cycle economic analysis.

Replacement construction may be used when the rehabilitation costs exceed 70 percent of the building's replacement cost. However, the 70 percent value may be exceeded if the structure warrants special attention or if justified by the life-cycle cost comparisons.

The assessment of new construction must include life-cycle maintenance costs, utility costs, replacement costs, and all other pertinent factors in the economic analysis. Replacement costs must be based on architectural design that is compatible with the historic property or district. Potential reuses of the historic structure must be addressed prior to making the final decision to dispose of the property.

The WAARNG must also consider costs associated with the contracting of qualified archaeologists, if needed, or the services of professionals to carry out historic building inspections.

Software is available to aid the WAARNG in the economic analysis of building maintenance costs related to layaway/mothballing, renovation and reuse, and demolition. There is also software for the analysis of window replacement costs.

The program is designed to estimate costs over a 20-year time period. The economic analyses included in the program are

- *The cost of each alternative over the life-cycle of the building*
- *The possible alternatives and additional costs incurred*
- *The point at which one alternative becomes a more viable option than others.*

There is also a Window Econometric Computer Program to provide life-cycle cost comparisons associated with the repair or replacement of windows. The Layaway Economic Analysis Tool Software is available on CD by contacting the AEC at 1-800-USA-3845, or online at <http://www.aec.army.mil/usaec/cultural/software.html>. The Layaway Economic Analysis Tool, Version 2.04 developed by the U.S. Army Engineer Research and Development Center / Construction Engineering Research Laboratories, is a Windows 95/98 NT-based software tool available to DoD users in CD-ROM format.

I.2.6 Cultural Landscapes

A cultural landscape is "a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values (*Cultural Resource Management Guidelines, NPS-28*)." A cultural landscape can be a

Historic site: *the location of a significant event or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself possesses historic, cultural, or archaeological value regardless of the value of any existing structure*

Historic designed landscape: *a landscape having historic significance as a design or work of art because it was consciously designed and laid out by a landscape architect, master gardener, architect, or horticulturist according to design principles, or by an owner or other amateur using a recognized style or tradition in response or reaction to a recognized style or tradition; has a historic*

association with a significant person or persons, trend, or event in landscape gardening or landscape architecture; or a significant relationship to the theory and practice of landscape architecture

Historic vernacular landscape: *a landscape whose use, construction, or physical layout reflects endemic traditions, customs, beliefs, or values in which the expression of cultural values, social behavior, and individual actions over time is manifested in the physical features and materials and their interrelationships, including patterns of spatial organization, land use, circulation, vegetation, structures, and objects; and in which the physical, biological, and cultural features reflect the customs and everyday lives of people*

Ethnographic landscape: *a landscape traditionally associated with a contemporary ethnic group, typically used for such activities as subsistence hunting and gathering, religious or sacred ceremonies, and traditional meetings.*

Cultural landscapes, as defined here, are a type of historic property addressed in terms of National Register eligibility and should not be confused with the “cultural landscape approach”. The cultural landscape approach is a comprehensive planning approach that incorporates historic properties along with all other categories of cultural resources.

Under Section 106 of the NHPA (see Appendix I), the following actions have the potential to have an adverse effect:

- *Renovations and upgrades to contributing components of the cultural landscape*
- *Demolition or replacement, and/or relocation of contributing components of the cultural landscape*
- *Modern elements added or constructed into a cultural landscape*
- *Property lease, transfer, or sale.*

Upon being advised by the project proponent of proposed operations or maintenance activities, renovations or upgrades, demolition, new construction, major landscaping projects, transfer, replacement, relocation, or sale or lease of property that could affect a property that is 45 years old or older and has an undetermined historic status, the CRM must determine its eligibility for the NRHP. If the property is determined eligible, the project represents an undertaking that has the potential to effect historic properties and must be reviewed under Section 106 of the NHPA. CRMs must also review projects involving ground disturbance (landscaping, utility excavations, building demolition or construction) to determine the potential for the project to affect archaeological sites.

If the WAARNG is managing cultural landscapes, the CRM should consider developing an agreement document with the SHPO or Tribes, as well as the development of an SOP (Chapter 3). Refer to section J.2.4 for inadvertent discoveries.

There are guidelines for the treatment and preservation of historic properties contained in The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for the Treatment of Cultural Landscapes. The standards can be viewed on the Internet at <http://www2.cr.nps.gov/hli/introguid.htm>. Information is also available in the National Park Service publication, Preservation Brief #36: Protecting Cultural Landscapes.

I.2.7 Other Cultural Resources

Other cultural resources include places or objects that a community of people value for their role in sustaining a community’s cultural integrity. These places that are important to a community tradition or activities could be eligible for listing in the NRHP and should be evaluated.

Even in those instances where evaluation of a resource considered important to a community or to Tribes results in a determination that the resource is not eligible for listing on the NRHP, potential impacts to the

resource can still be considered under NEPA. NEPA procedures offer the public a chance for comment on projects that might affect places of community significance.

Sacred Sites

According to EO 13007, a “sacred site” is “any specific, discrete, narrowly delineated location on Federal land 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 ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site.”

Restricting access to information regarding sacred sites is recommended and will ensure a positive working relationship with Tribes. Refer to section 2.5 regarding information restriction requirements.

Consultation with Tribes should be conducted to identify their cultural resources management concerns, specifically with sacred sites. If sacred sites have been suspected during a survey, local federally recognized Tribes should be notified. Refer to the POC List of federally recognized Tribes in **Appendix E**.

Per AIRFA and EO 13007, Tribes have the right to access and use sacred sites on WAARNG-controlled lands. Reasonable terms, conditions, and restrictions regarding access to sacred sites will be agreed upon in order to protect personal health and safety and to avoid interference with the military mission or with national security. Sacred sites may be used for ceremonies that take place one or more times during a year. Reasonable notice should be given by the WAARNG if mission actions prohibit Tribes access to a sacred site.

Avoid adversely affecting the physical integrity of sacred sites. If the site is adversely affected or has potential of being adversely affected, NHPA Section 106 procedures must be complied with. See **Appendix I** regarding Section 106 procedures.

Cemeteries

For assessing the significance of cemeteries, and gathering information that can be used for their subsequent preservation and protection, the CRM should follow the guidelines outlined in the National Register Bulletin “Guidelines for Evaluating and Registering Cemeteries and Burial Places” and WA state burial laws or cemetery protection laws (available at http://www.wastatecem.org/index.php?option=com_content&task=view&id=2&Itemid=6) as follows:

Chapter 65.04 RCW Duties of county Auditor

Title 68 RCW Cemeteries, Morgues and Human Remains

The Army management responsibilities with respect to cemeteries located on an installation depends on whether the facility is a National Cemetery Administration (NCA), Department of Veterans Affairs (VA) cemetery; Army National Cemetery; post cemetery; or private cemetery. For these categories of cemetery (i.e., burials in designated and marked cemeteries), CRMs should follow the guidance in AR 210-190, found at http://www.army.mil/usapa/epubs/pdf/r210_190.pdf (see **Appendix I**).

CRMs should also note that many states have laws relating to cemeteries and unmarked graves; for example, Arkansas Act 753 of 1991, as amended, makes it a class D felony offense to knowingly disturb a human grave.

The WAARNG has no plans to disturb the cemeteries on its lands. Known cemeteries on WAARNG lands are fenced for protection, monitored periodically for integrity, and are identified on site and training installation plans as sensitive resource areas to be avoided.

Historic Objects

Historic objects can include records, photographs, artifacts, and donated private collections that are associated with the WAARNG's military history. These objects should be inventoried and ownership determined. The Army currently does not provide funding for preservation and conservation of historic objects in its inventory, apart from those in designated museums. CRMs should coordinate with the WAARNG historian, if one has been assigned, or with the ARNG historians in the Public Affairs Office, regarding procedures for dealing with historic objects.

I.3 Tribal Consultation

The NHPA, EO 13007, EO 13175, Presidential Memorandum for Heads of Executive Departments and Agencies dated 29 April 1994: Government-to-Government Relations with Native American Tribal Governments, DoDI 4710.02, and the Annotated Policy Document for DoD American Indian and Alaska Native Policy, dated 27 October 1999, require federal agencies to consult with federally recognized American Indian tribes.

Consultation takes on many forms. The WAARNG might need to consult on a project basis for proposed actions that might affect cultural resources of interest to Tribes. If WAARNG activities have the potential to affect tribal properties or resources, all interested Tribes will be consulted early in the planning process and their concerns will be addressed to the greatest extent possible. Establishing a permanent relationship with Tribes will lead to better understanding of each party's interests and concerns and development of a trust relationship. This will streamline future project-based consultation and streamline the inadvertent discovery process.

It is the goal of the consultation process to identify both the resource management concerns and the strategies for addressing them through an interactive dialogue with appropriate American Indian communities.

I.3.1 Issues and Concerns

Issues are both general and particular. On the one hand, traditional American Indians might attach religious and cultural values to lands and resources on a very broad scale, such as recognizing a mountain or a viewshed as a sacred landscape, and they could be concerned about any potential use that would be incompatible with these values. On the other hand, issues could be specific to discrete locations on public lands, such as reasonable access to ceremonial places, or to the freedom to collect, possess, and use certain regulated natural resources such as special-status species.

Many American Indian issues and concerns, although associated with WAARNG lands and resources, are based on intangible values. Intangible values are not amenable to "mitigation" in the same way that a mitigation strategy can be used to address damage to, or loss of, physical resources.

Some of the issues that frequently surface in consultation are briefly discussed here to illustrate the relationship of American Indian interests and concerns to WAARNG land and resource management decisions.

Access. Free access to traditionally significant locations can potentially be a difficult issue for WAARNG managers when there would be conflicts with other management obligations, military mission and site security requirements.

Use. One of the more tangible issues with potential for resource conflict is American Indian collection and use of plants and animals for traditional religious or cultural purposes. Some species regulated under the Endangered Species Act could have religious or cultural significance. Collection of other resources, such as plant products, minerals, and gemstones, might be regulated under other statutory authority and/or WAARNG policy.

Sacredness. American Indian attribution of sacredness to large land areas is one of the most difficult issues for WAARNG managers to reconcile with other management responsibilities. From the viewpoint of traditional religious practitioners, a particular land area could be regarded as a hallowed place devoted to special religious rites and ceremonies. Practitioners might perceive any secular use or development in such a place to be injurious to its exceptional sacred qualities or a sacrilege and, therefore, unacceptable from their view. Nevertheless, the WAARNG manager might be put in the position of having to weigh a proposal for a legally and politically supported use such as mineral development in an area regarded as sacred and inviolate.

Mitigation. Strategies to reduce impacts of proposed federal actions or the effects of proposed undertakings generally follow models related to NEPA, the NHPA, and their implementing regulations (40 CFR Parts 1500–1508 and 36 CFR Part 800). Where American Indian cultural and religious concerns are involved, however, conventional methods of mitigation generally do not appropriately address the consequences felt by American Indian practitioners.

The fact that the CRMs are frequently the ones assigned to do the staff work for certain American Indian issues could lead to some misunderstanding that American Indian issues are cultural resources issues. From there it could be mistakenly deduced that American Indian issues might often be resolved through mitigation methods such as archaeological data recovery. Such ideas would misinterpret the majority of American Indian issues that managers must consider in decision-making.

It is feasible, where some issues of American Indian use are involved, that mitigation procedures could work. For example, mitigation could work in cases where common natural products are the object, and either the WAARNG proposal or the American Indian use is flexible.

That is, it could be possible for an WAARNG proposal to be modified to allow continuing traditional resource use, or it might be acceptable for the American Indian use to be moved outside the proposed affected area. In contrast, however, more abstract, nonresource issues surrounding belief and practice could be a much different matter.

Consultation as Conflict Resolution. Section 106 consultation is intended to be a conflict-resolution and problem-solving system that balances public interest in historic preservation with benefit from a proposed project. Consultation must be conducted in a positive and respectful way in order to set the tone for successful problem solving. In meeting the requirements of Section 106 of the NHPA, the agency must identify historic properties, consider the effect its proposed action will have on any identified sites, and then consult with the SHPO and other stakeholders including Tribes on ways to avoid or mitigate any adverse effects. The law does not mandate a particular result. However, it does provide a meaningful opportunity to resolve potential conflicts. The WAARNG recognizes the sovereign status of the Tribes and will ensure adequate and meaningful consultation process by developing trust and continuous working relationship to build a better process of understanding each others' concerns and cultural sensitivity.

It is possible for the WAARNG to address many of the concerns for gaining access to sites, attaining needed materials, and protecting American Indian values, within the normal scope of multiple use management. Solutions can include: (1) providing administrative access to sensitive areas; (2) making special land use designations; (3) developing cooperative management agreements with American Indian communities; (4) stipulating for continuing American Indian uses in leases, permits, and other land use authorizations; (5) diverting or denying clearly incompatible land uses; and (6) similar affirmative management solutions.

Consultation should identify not only American Indian interests and concerns, but also their suggestions for potentially effective approaches to address them.

Consultation is incomplete and largely pointless unless it is directed toward the identification of mutually acceptable solutions.

When a proposed WAARNG decision poses potential consequences for lands and resources valued by American Indians, consultation with the community that holds the values and identified the consequences can generate strategies for an appropriate management response.

A list of tribal representatives and POCs is included in **Appendix E**.

Timing for Native American consultation will vary depending on the consultation methods, the nature of the ongoing relationship, and the purpose of the consultation. Consultation to develop understanding of interests and concerns with land and resource management, and establishing procedures for working together, is a continuous and ongoing process.

For project-specific consultation, the CRM should send appropriate reports and documentation to potentially affected THPO/Tribes describing the proposed action and analysis of effects (either Section 106 or NEPA documents) and request comments and input. After 30 days, the CRM should follow up with THPO/Tribes for input if no correspondence has been received. A thorough MFR must be kept. For projects of particular interest to THPOs/Tribes, the CRM could consider a site visit and meeting with affected THPOs/Tribes.

I.3.2 Consultation Resources

The following agencies can provide useful information and guidance on how to identify Tribes with interests in the lands within the WAARNG virtual installation and how to consult with Tribes under AIRFA, NHPA, NEPA, ARPA, and NAGPRA. Representatives from these agencies are also often available to facilitate consultations.

Bureau of Indian Affairs: www.doi.gov/bureau-indian-affairs.html

National Association of Tribal Historic Preservation Officers: www.nathpo.org

DoD Tribal Liaison Office: <https://www.denix.osd.mil/denix/Public/Native/native.html>

I.4 Stakeholder and Public Involvement Plan

Stakeholder and public involvement and community outreach can be driven by regulation in project-specific cases, or can be a proactive method of partnering with interested parties to achieve long-range goals and solicit program support. The following section describes some methods to involve stakeholders and the public for projects or programs.

Stakeholders can include

- *SHPO*
- *Tribes/THPOs*
- *Veterans organizations*
- *Interested public*
- *Federal and state agencies*
- *Special interest groups*

- *Local historical committees and societies*
- *Tenants, lessees, and land users (hunters, fishermen, boy scouts, police)*
- *Neighbors*
- *Landowners*
- *Contractors*
- *ARNG*
- *Integrated Readiness Training*
- *Reserve Officer Training Corps (ROTC)*
- *ODEP/AEC.*

Consultation with Tribes is required by several cultural resources laws, regulations, and Eos; and DoD policy and is good stewardship of cultural resources. Tribal consultation is addressed in section J.3 and Appendix I.

I.4.1 Public and Stakeholder Involvement and Outreach

Public participation and involvement are required for most environmental programs, including cultural resources. Regulation 36 CFR 800.2(d) requires that the WAARNG seek and consider public views in its undertakings that could have an effect on historic properties. For tribal consultation see section J.3. Benefits of public involvement to the WAARNG include

- *Opening the decision-making process to the public and building credibility*
- *Assisting with the identification of issues*
- *Enhancing mutual understanding of stakeholder values and WAARNG management challenges*
- *Making better decisions*
- *Minimizing delays and enhancing community support.*

If WAARNG plans have the potential to affect a historic property and an EA or EIS is deemed unnecessary, public involvement is still expected. Under Section 106 regulations, federal agencies are required to involve the public in the Section 106 process. This includes the identification of appropriate public input and notification to the public of proposed actions, consistent with 36 CFR 800.2(d). The WAARNG may choose to follow the same process as stipulated in NEPA for EAs.

The regulations also state that, to streamline the process, the public involvement requirements under NEPA should be incorporated into cultural resource planning and projects when activities require the development of an EA or an EIS.

Note: For any adverse effect, it is the WAARNG's responsibility to determine which stakeholders may have an interest, e.g., local historic preservation group, statewide nonprofit preservation organization, and determine the level of public involvement needed. However, in accordance with 32 CFR Part 651.28, a REC can be used if the SHPO concurs with the action.

Timing: For Section 106 projects and EAs, anticipate approximately 6 to 9 months to complete the compliance process, more complex projects can take longer. If an EIS is required, plan for 12 to 16 months to complete. Again, a complex or controversial project could take up to 3 years to complete. Public Involvement requirements are included in these time estimates.

Distribution of Documents

Public notices can be posted in places where people gather or visit such as the local post office or grocery stores. Public notices should also be placed in the local newspaper.

While interacting with private newspapers, it is important to recognize that the audience might not appreciate the military mission or community. Whenever possible, points should reflect positively on the ARNG and be made in a clear and noncontroversial manner.

Special efforts will be made to use newspapers to acquaint the surrounding communities with the overall cultural resources program at the various WAARNG sites and training installations. It is to the benefit of the WAARNG to inform the public of these programs. This can be achieved through press releases. In addition to the newspaper, press releases can be sent to local magazines or Web-based news sites.

Libraries are excellent repositories to allow for public access to documents for review. Most communities, schools, and universities have libraries.

I.4.2 Public Involvement Opportunities

Education can promote awareness of important WAARNG cultural resources projects and the rationale behind them. Actions such as selling a historic building require effective communication to get positive support and, perhaps more importantly, to avoid adverse impacts and reactions from various public groups. A preservation awareness program must be directed to both WAARNG and external interests if it is to be effective.

I.4.3 Special Events

Special events with local and national significance offer excellent opportunities to educate the public on cultural resources preservation. Events such as Earth Day (22 April), Fourth of July, Veteran's Day, National Historic Preservation Week (third week in May), National Public Lands Day (last Saturday in September), and local town celebrations are opportunities for the ARNG to help educate people about cultural resources and preservation principles. Section I.7 contains Web sites that can aid WAARNG in this task.

I.4.4 Executive Order 13287 (Preserve America)

In addition to the reporting requirements outlined in section I.1.3, EO 13287 encourages federal agencies to preserve America's heritage by actively advancing the protection, enhancement, and contemporary use of the historic properties owned by the federal government; promoting intergovernmental cooperation and partnerships for the preservation and use of historic properties; inventorying resources; and promoting heritage tourism. Some ideas for promoting this EO include

- *Virtual tours of historic facilities or sites*
- *Partnerships*
- *Museum and exhibits*
- *Veteran's history project*
- *Traveling exhibits*
- *Walking tours.*

I.4.5 Other Opportunities for Outreach

Other methods for reaching external stakeholders include

- *Public forums*
- *Web sites*
- *Scoping meetings*
- *Questionnaires and feedback sheets*
- *Public notices*
- *Presentations at various forums and gatherings*
- *Cross training the WAARNG staff to be a liaison*
- *Society meetings.*

By knowing who the interested public is, other methods will come to light.

I.4.6 Public Affairs Office

The PAO performs more of an oversight and guidance role with respect to public involvement issues. The PAO maintains liaison with the project proponent, CRM, JAG, and other ARNG offices. In support of NEPA and NHPA actions, the Public Affairs Environmental Office assists the project proponent in the preparation of press releases, public notices, and other information. The PAO environmental office provides guidance for planning and coordination, conducts public meetings or hearings for the WAARNG, supports the project proponent during the NEPA process, and reviews all NEPA documents.

Any public involvement plans, outreach, special events, or informational briefings should be developed and implemented by the WAARNG PAO. If such activities do not originate in the PAO, the office should approve them.

Public notices published in support of EAs should be submitted to the PAO in the form of a three-column commercial advertisement and should be published at least 3 consecutive days. The PAO should insist on a tear sheet from the newspaper or a notarized copy of the public notice advertisement to ensure the ad has run and the program manager or the PAO has proof of publication.

I.5 Agreement Documents

In some cases, streamlining Section 106 regulations, addressing issues under NHPA, NAGPRA, and EO 13175; and the consultation process can be accomplished through the use of an MOA, PA, CAs, or plan of action and MOU.

MOAs are agreement documents for specific undertakings on how the effects of the project will be taken into account (36 CFR 800.5(e)(4)), and, in general, used as a mitigation agreement document for the adverse effects of a single undertaking. The agency, the ACHP, the SHPO/THPO/Tribes, and possibly other consulting parties negotiate MOAs. These agreement documents govern the implementation of a particular project and the resolution of particular effects of that project.

PAs are, in general, used to govern the implementation of a particular program or the resolution of adverse effects from certain complex projects or multiple undertakings. PAs are negotiated between the agency, the ACHP, the SHPO/THPO/Tribes, and possibly other consulting parties. These agreement documents may be used when

- *Effects on historic properties are similar and repetitive or are multistate or regional in scope*
- *Effects on historic properties cannot be fully determined prior to approval of an undertaking*
- *Nonfederal parties are delegated major decision-making responsibilities*

- *Routine maintenance activities are undertaken at federal installations, facilities, or other land management units*
- *Circumstances warrant a departure from the normal Section 106 process.*

CAs are similar to a PA structure and used to establish the repatriation process under NAGPRA. CAs are negotiated between the agency, the THPOs/Tribes, and possibly other claimant groups or parties. These agreement documents can govern the notification process, reburial procedures, limitations, custody procedures, and monitoring plans. CAs are particularly useful when it is known upfront that remains or funerary objects are likely to be encountered.

A plan of action is prepared after an inadvertent discovery under NAGPRA is made (e.g., human remains or items of cultural patrimony) and is prepared after a consultation meeting(s) with the appropriate Tribe(s). The plan is a presentation of the verbal agreements that are made during the consultation regarding the extraction of the remains, length of time out of the ground, disposition while out of the ground, who the remains will be repatriated to and in what manner, information about the public notice that must be published (e.g., in the newspaper at least four weeks before repatriation, in two notices, one week apart), and a description of the repatriation process.

MOUs in general, are used to clarify protocols and roles and responsibilities. The agency, the SHPO/THPO/Tribes, and other consulting parties can negotiate MOUs. These documents are used as a tool to ensure that all involved parties are informed of, and agree upon, the details of a particular cultural resources management program.

Procedures for PAs and MOAs are outlined in PAM 200-1. ARNG can provide sample documents. Draft MOAs, PAs, CAs, and plans of action must be reviewed by ARNG and ODEP/AEC. Development of agreement documents requires public and stakeholder involvement.

The following is the list of attachments accompanying all types of draft agreement documents to be sent to the ARNG, as appropriate to the action:

1. Cost estimate
2. Form 420 R or 1391 – signed
3. State JA Email stating he/she has reviewed the draft MOA
4. Any supporting documents as applicable.

Timing: Preparation and review time for agreement documents will vary with complexity of issues and the number of parties involved. The review process is as follows:

- *WAARNG drafts the agreement document*
- *ARNG (including ARNG-JA and other divisions) reviews, any comments are sent back to the WAARNG for incorporation*
- *ODEP and AEC reviews and submits comments to ARNG to the WAARNG for incorporation*
- *ARNG reviews for legal sufficiency (2nd review)*
- *ARNG, Chief, ARE signs, if no changes needed*
- *WAARNG representative signs (i.e., TAG, CFMO) signs*
- *SHPO signs*
- *Other signatories sign.*

At a minimum anticipate:

MOAs – 4 to 6 months

PAs – 6 to 12 months

CAs – 6 to 12 months

plan of action – 6 to 12 months

MOUs – 4 to 6 months.

I.6 Sustainability in Cultural Resources Management

The federal government encourages agencies to take the lead in being stewards of the environment, to preserve today's resources for the future. EO 13423 *Strengthening Federal Environmental, Energy, and Transportation Management* advocates a variety of approaches to assist agencies in reducing waste, saving resources, and promoting environmentally friendly design. The CRM should coordinate sustainability efforts with the WAARNG's Environmental Management System (EMS).

One of the primary focuses of stewardship within the DoD is the concept of sustainability; this concept applies to design, construction, operations, and resource conservation. Sustainability is responsible stewardship of the nation's natural, human, and financial resources through a practical and balanced approach. Sustainable practices are an investment in the future. Through conservation, improved maintainability, recycling, reduction and reuse of waste, and other actions and innovations, the WAARNG can meet today's needs without compromising the ability of future generations to meet their own.

Applying sustainability principles to cultural resources management, Chapter 4 of the NPS publication *Guiding Principles of Sustainable Design*, notes that "sustainability has often been an integral part of the composition of both tangible and intangible cultural resources. Ecological sustainability and preservation of cultural resources are complementary. In large part, the historic events and cultural values that are commemorated were shaped by humankind's response to the environment. When a cultural resource achieves sufficient importance that it is deemed historically significant, it becomes a nonrenewable resource worthy of consideration for sustainable conservation. Management, preservation, and maintenance of cultural resources should be directed to that end." (http://www.nps.gov/dsc/d_publications/d_1_gpsd_4_ch4.htm#2)

I.6.1 Archaeological Sites

Archaeological sites offer a special challenge for implementation of sustainability initiatives for several reasons. The need to protect site locations has long been seen as a hindrance to training or Master Planning on installations, as it represents a competing land use requirement. Completion of archaeological predictive models and surveys help reduce the footprint of parcels where training or development is restricted; however, few ARNG parcels have been completely surveyed for archaeological resources. As installations are increasingly effected by encroachment, any restriction on land use within the installation is seen as counterproductive to the mission.

Archaeological sites provide a physical record how people have interacted with their environment in the past and what that tells us of how they led their lives. It is the product of ongoing change, stretching from the distant past into the present. Physically, this record is non-renewable – in each period, a combination of natural and cultural processes almost inevitably impacts the record of previous periods. Intellectually, the record is in a constant flux of discovery, redefinition and interpretation through archaeological investigation and dissemination. Present uses will provide grist for the archaeologists of the future - the physical record of how we have lived and treated our environment and how much of *our* past we pass on to our successors.

In an analysis of how archaeology could contribute to sustainable development initiatives (<http://www.britarch.ac.uk/conservation/ArchQOL.html>), the Council for British Archaeology concluded that archaeology and the historic environment are:

- the only source for understanding the development of human society in prehistoric and much of historic times
- a source of enjoyment and interest through intellectual and physical engagement and leisure-time pursuits, contributing to general mental, spiritual and physical health
- an important medium for general education, life-long learning and personal development
- a vital basis of people's awareness of historical and cultural identity, sense of community and place, and a key source of perspective on social change
- a non-renewable record of people's long-term social, spiritual and economic relationships and their interaction with all parts of the environment
- a fundamental determinant of environmental character, bio-diversity and cultural diversity
- a catalyst for improving the distinctive qualities of places where people live and work or which they visit
- a means of understanding long-term environmental change in relation to sustainability
- a source of evidence about past use of renewable energy and recyclable resources such as water, timber, mineral resources, and organic waste
- a source of added value in economic and social regeneration
- a major source of revenue through tourism and recreation.

These benefits can be maximized by enhancing people's awareness of archaeology and the historic environment and developing a culture, within government and the private sector and in their dealings with others, of promoting active involvement, care and appreciation for the benefit of present and future generations.

Archaeology and the historic environment contribute significantly to people's quality of life. The ARNG has a responsibility for stewardship of this environment so that it can continue to inform present and future populations about our shared past. At the same time, stewardship must be integrated into the ARNG mission. In addition to promoting public awareness of archaeological information and the benefits of preservation to the larger installation community (see Public Outreach and Awareness discussion elsewhere in this appendix), there are a number of new initiatives being explored to integrate archaeology into the success of the mission.

The Cultural Resources Program at Fort Drum, for example, has pioneered the following initiatives as part of a DoD Legacy Resources Management Program project:

- A program to "harden" historic archaeological sites for the dual purposes of protecting sites from natural erosion and facilitating their use for military training; this program involves covering sites with geotextile fabric, sand, and gravel, and then allowing units to park vehicles within the site for various training exercises. The program has received approval from the New York SHPO and is completed with ITAM funds.
- A program to create models of archaeological features, of the types likely to be encountered by soldiers mobilized in the Middle East, for use during training exercises. This program educates the soldier in how to identify cultural features and maneuver within the environment of an archaeological site in a manner that reduces or avoids damage to significant resource areas.
- A program to develop training scenarios that include archaeological sites and protection issues (e.g., halting looting or damage) to provide more realistic training for soldiers before they are mobilized overseas, and to increase awareness of archaeological issues at home
- Development of playing cards with archaeological content for distribution to units being mobilized overseas. The cards include information on the prehistory of the areas (Iraq and Afghanistan) where the units will operate, identify important features of the landscape, and present information on preservation and protection issues related to archaeological sites in these countries.

Appendix J includes slides from a Power Point presentation given by the Fort Drum cultural resources staff on the site hardening program, and an example of a training scenario developed for use at Fort

Drum. Copies of other materials developed by Fort Drum are available on DENIX, or by contacting the cultural resources staff at Fort Drum.

I.6.2 Building Renovation and Repair

Renovation of older buildings, compared to new construction, could result in considerable energy savings and reductions in materials used, thus benefiting the environment. In addition to reducing project costs, there might also be significant savings in time and money associated with reduced regulatory review and approvals. Additional reduced costs can occur with sustainable aspects of site and construction debris management.

In the event that buildings aren't suitable for renovation, salvage as much as possible from the building(s) being demolished. Salvage of historic materials reduces landfill pressure, preserves important character-defining features of historic buildings, and saves natural resources. Typical examples of salvageable materials include lumber, millwork, certain plumbing fixtures, and hardware. Make sure these materials are safe (test for lead paint and asbestos), and don't sacrifice energy efficiency or water efficiency by reusing old windows or toilets.

Sustainable renovations also could provide opportunities for enhanced cooperation with local regulatory authorities, as well as providing site enhancement potential. The alternatives could be less expensive, more environmentally responsible, and potentially more aesthetically pleasing.

A comprehensive job-site waste-recycling program should be part of any renovation plan. Some construction waste materials can be sold, thus recovering the investment in separation and separate storage. More significant savings are often achieved through avoided expense of landfill disposal. In large projects, the savings can be dramatic.

Additional guidance related to green building design and building operations can be found in AR Engineering Technical Letter 1110-3-491 "Sustainable Design for Military Facilities (2001)." The WAARNG seeks to meet LEEDS Silver standards for all new construction.

I.6.3 Landscape Design

Sustainability principles also apply to preservation of landscape elements and undisturbed land that might contain archaeological or sacred sites. Some specific principles include

- *Integrate sustainability principles from the onset of project design. Involving technical experts such as archaeologists and landscape architects early in the site-planning process might reduce the need for (and cost of) plantings or landscape modification by identifying ways to protect existing site plantings or landscape features.*
- *Locate buildings to minimize environmental impact. Cluster buildings or build attached units to preserve open space and wildlife habitats, avoid especially sensitive areas including wetlands, and keep roads and service lines short. Leave the most pristine areas untouched, and look for areas that have been previously damaged to build on. Seek to restore damaged ecosystems.*
- *Situate buildings to benefit from existing vegetation. Trees on the east and west sides of a building can dramatically reduce cooling loads. Hedge rows and shrubbery can block cold winter winds or help channel cool summer breezes into buildings.*
- *Value site resources. Early in the siting process carry out a careful site evaluation, including solar access, soils, vegetation, water resources, important cultural landscape elements, pristine or protected natural areas, and let this information guide the design.*

I.6.4 Education

Finally, the WAARNG should make education a part of its daily practice: Use the design and construction process to educate leadership, employees, subcontractors, and the general public about environmental impacts of buildings and infrastructure and how these impacts can be minimized.

I.7 Additional Resources

DRAFT Nationwide Readiness Center (Armory) Programmatic Agreement. In accordance with 36 CFR Part 800.14 (b), a nationwide PA is being developed to help streamline the Section 106 process for federal undertakings at readiness centers (armories).

Conservation Handbook. The Conservation Handbook will link to any specific law or regulation.

I.7.1 Web sites

The ACHP Web site provides current preservation news and links to laws and regulations concerning heritage preservation. <http://www.achp.gov>

DENIX – is the central platform and information clearinghouse for environment, safety and occupational health (ESOH) news, information, policy, and guidance. Serving the worldwide greater DoD community, DENIX offers ESOH professionals a vast document library, a gateway to Web-based environmental compliance tools, an interactive workgroup environment, a variety of groupware tools and an active membership community numbering thousands. <http://www.denix.osd.mil>

ICRMP Toolbox on DENIX

<https://www.denix.osd.mil/denix/public/esprograms/conservation/legacy/etb/etbwelcome.htm>

Save America's Treasures. www2.cr.nps.gov/treasures/

The U.S. Environmental Protection Agency Web site provides links to EPA news, topics, laws and regulations, and information sources. <http://www.epa.gov>

Guardnet. <http://guardnet.ARNG.army.mil>

The DoD Legacy Resources Management Program Web site explains a Legacy project can involve regional ecosystem management initiatives, habitat preservation efforts, archaeological investigations, invasive species control, Native American consultations, and monitoring and predicting migratory patterns of birds and animals. <http://www.dodlegacy.org>

The NPS, *Links to the Past* Web page is a resource to find information on cultural resource subjects and cultural resource programs. <http://www.cr.nps.gov>

The NRHP Web site provides links to assist in registering a property to the NRHP among other various preservation topics and links. <http://www.cr.nps.gov/nr>

The National Trust for Historic Preservation has an informative Web site of how the private sector preserves America's diverse historic places and communities through education, advocacy, and resources. <http://www.nthp.org>

The Secretary of the Interior's Standards for Rehabilitation Web site describes the intent of the Standards, which is to assist the long-term preservation of a property's significance through the preservation of historic materials and features. <http://www2.cr.nps.gov/tps/tax/rhb/index.htm>

The U.S. Army Corps of Engineers lists links from civil works to historic preservation where they list managing and engineering solutions. <http://www.nws.usace.army.mil>

The USAEC Web site provides a link to the cultural resources that include Native American affairs, historic buildings and landscapes, archaeology, and the Army Historic Preservation Campaign Plan. <http://aec.army.mil/usaec/cultural/index.html>

The Bureau of Indian Affairs (BIA) Web site provides links to Tribal agencies and Tribal leaders, among other helpful links. <http://www.doi.gov/bureau-indian-affairs>

The Layaway Economic Analysis Tool Software – The mission of the Cost and Economics is to provide the Army decisionmakers with cost, performance, and economic analysis in the form of expertise, models, data, estimates, and analyses at all levels. Links include ACEIT, AMCOS, Cost and Economic Analysis, Cost Management/ABC. <http://www.ceac.army.mil/>.

The Washington Army National Guard's homepage is <http://washingtonarmyguard.org/>.

APPENDIX J

SAMPLE DOCUMENTS AND TRAINING BRIEF

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Content Updated: 21 Aug 07

Cultural Resources Consolidated Survey

Subsections

[CFO Act - Heritage Assets](#)

[Collections Curation](#)

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[Inventory of Archaeological Resources](#)

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[Native American Cultural Resources](#)

[General](#)

The following questions are designed to address the Army's reporting requirements under various Federal laws and regulations. They are primarily divided according to the applicable laws or subject areas. Your answers provide necessary information to HQDA, IMCOM, ARNG, and USAR headquarters staff to use in improving the Army cultural resources program and design programmatic compliance actions. Throughout the survey, the term "installation" is used; for the National Guard, this means the state (the "virtual installation"), and for the Reserve, it includes United States Army Reserve Installations and Regional Readiness Commands (RRC) (all RRCs should answer as one RRC, not by individual facility or state).

CFO Act - Heritage Assets

The purpose of this survey is to provide information to assist the Army to meet its financial and historic property reporting requirements under the Chief Financial Officers Act of 1990 and Executive Order 13287 and the annual year end survey for Measures of Merit and the Federal Archaeological Report. Every federal agency is required to report data on several categories of "heritage assets" including accurate counts and the condition of the assets. Current accounting standards and financial reporting requirements require Federal agencies to improve the reliability of the data that is used to inform financial statements and to manage the data through a sustainable, integrated data management system to include archaeological sites, information reported in the Federal Archeology Report and other reporting requirements. The annual report on heritage assets is forwarded to ASA-FM the first week of October for inclusion in the Army's Annual Financial Statement submitted to DoD.

IMPORTANT NOTE: ALL ANSWERS MUST REFLECT STATUS AS OF THE END OF THE CURRENT FY. SUBMIT ANSWERS ONLY WHEN YOU ARE SURE THERE WILL BE NO CHANGES TO DATA BEFORE 1 OCTOBER 2006. Data should reflect end of FY data for financial reporting purposes. Consequently the data call ends on the last working day of the financial year.

For reporting of this survey in the fall of 2007, the term "current FY" refers to FY 2007. A year later, this term will refer to FY 2008. The CFO Act questions (1-8) should only include properties on Federally-owned land.

1) How many recorded archaeological sites (total) are on your installation? For the purposes of this survey, recorded archaeological sites are those sites which have been officially identified and given identification numbers (trinomials). Cemeteries are not usually regarded as archaeological sites, and are

counted separately through the Integrated Facilities System. Please identify the number of all recorded archaeological sites on Federally-owned land. 7

2) How many recorded archaeological sites were added to the inventory in the current FY? 0

3) How many recorded archaeological sites were removed from the inventory in the current FY? Please identify (if any) the number of recorded archaeological sites that may have been removed from your inventory count. They may have been removed because they were destroyed, mitigated or for other reasons. 0

4) How many archaeological sites have been determined eligible for listing or are listed on the National Register of Historic Places? Eligibility determinations are made in conjunction with the State Historic Preservation Officer, or through an official Determination of Eligibility from the Keeper of the National Register, against the eligibility criteria in NHPA. This number cannot be larger than the number of recorded sites. 3

5) How many sites were newly determined eligible or listed in the current FY? These sites are those which may or may not have been previously recorded sites but have been newly determined eligible or listed in the current FY and for which a determination of eligibility has been made. 0

6) How many if any that were previously determined eligible or listed on the NR were determined ineligible or delisted in the current FY? Sites may have been re-evaluated and determined ineligible, destroyed, mitigated or removed for other reasons. 0

7) Please identify the number of sacred sites that have been recorded on your installation. As defined by EO 13007, a sacred site is a specific delineated location on Federal land that is identified by an Federally-recognized 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 ceremonial use by, an Indian religion, and that has been identified by the tribe or individual to the Federal agency. 0

8) Please identify the number of sites of traditional religious or cultural importance to Native Americans or Native Hawaiians (as defined by NHPA) that have been recorded on your installation. 0

Collections Curation

Pursuant to 36 CFR 79.2, Federal agencies must ensure that archaeological collections are deposited in educational and/or scientific institutions, such as museums, universities, or other Federal, state or local governmental agencies that can provide professional curatorial services on a long-term basis, or with the Indian tribes associated with the artifacts. Curation facilities or repositories established on Army installations usually do not meet these requirements due to the long-term, permanent recurring costs and personnel requirements required by 36 CFR 79 for such repositories. The only exception to this policy is for Army archaeological collections that are accepted for curation in an Army museum that has been certified pursuant to AR 870-20. For Army National Guard, collections include all artifacts recovered from federally-owned or federally funded projects on state, leased or special use permitted land.

9) Is there a Federal Archaeological Collection associated with the installation? Installations are responsible for collections and records from Federal Army installations and from certain lands leased or withdrawn from other entities. An archaeological collection (per 36 CFR 79) for the purposes of this survey is defined as a whole collection of Federal artifacts (associated with a Federally funded project or federal property) or material remains that are excavated or removed during surveys, excavations or other studies of prehistoric or historic resources, and associated records from all archaeological sites on your installation. Not all installations may have a collection, but each installation/state for ARNG with a collection is considered to have only one (1) collection for the whole installation. A collection can be housed in multiple locations. No

10) Are all collections at your installation curated in accordance with 36 CFR 79? N/A

11) Identify the completion status of collections curation. Answer "complete" if the collections present have been curated in accordance with the standards set forth in 36 CFR 79. Answer "partially complete" if a collections curation has been initiated, but is not yet complete. Answer "not initiated" if the installation has collections, but has not yet initiated curation IAW 36 CFR 79.

N/A

12) How many cubic feet of archaeological collections does the installation own? Any archaeological items recovered during archaeological projects on your installation are owned by the installation regardless of who has possession. This excludes items repatriated under NAGPRA. 0

13) How many cubic feet of collections require upgrading to 36 CFR 79 standards? 0

14) How many linear feet of records associated with stored archaeological materials does the installation own? Any archaeological items recovered during archaeological projects on your installation are owned by the installation regardless of who has possession. This excludes items repatriated under NAGPRA. 0

15) How many linear feet of records associated with stored archaeological materials require upgrading to 36 CFR 79 standards? 0

16) If you added or removed your Federal Archaeological Collection in the current FY, please explain the reason. The answer should clearly explain the circumstance of the addition or deletion, which may include: if you did not report your collections last year or you now have a collection and previously had none or if for some reason your collection was de-accessioned or somehow does not classify as a Federal Archaeological Collection per the definition above but was counted in the previous FY. N/A

Archeology

The Archaeological Resources Protection Act (ARPA) applies to archaeological sites over 100 years of age, and concerns criminal and civil penalties for damage or the attempt to damage archaeological sites without a permit. (For the ARNG, questions 17-20 apply to those sites on property listed in PRIDE under Category 1.)

17) Are known archaeological sites present on the installation? Enter "yes" if the installation has any archaeological sites over 100 years old. Enter "no" if there are no archaeological sites over 100 years old.

Yes

18) Are site protection procedures needed on your installation? Site protection measures can include actions such as site stabilization, monitoring programs, fencing, interpretation and physical barriers.

Yes

19) If yes, are site protection procedures in effect? If necessary site protection procedures are in effect, answer "yes". If they are necessary but not in effect, answer "no".

No

20) What is the total number of documented violations of ARPA this FY? Installation law enforcement officials must have formally recorded these violations. 0

Archeology on non-Federal Lands

For the next two questions, only discuss archaeological sites not on Federally-owned land (to include state, leased, special use permitted land and any other land under other PRIDE categories for the ARNG). These numbers should not include the sites reported in the CFO section above.

21) How many sites were discovered on non-Federal lands as a result of Federally-funded or permitted activities during the last fiscal year? 0

22) How many sites on non-Federal land were determined eligible for the National Register of Historic Places as a result of Federally-funded or permitted activities during the last fiscal year? 0

Integrated Cultural Resources Management Plan

DoD Instruction 4715.16 and AR 200-1 require installations to develop an Integrated Cultural Resources Management Plan (ICRMP) as an internal compliance and management tool that integrates the entire cultural resources program with on-going mission activities. The ICRMP is based upon information derived from historic, archaeological, ethnographic and architectural investigations. It specifies management strategies for known cultural resources, and methodologies for identification and evaluation of unknown resources. ICRMPs are to be updated every 5 years at a minimum; more frequent updates may be necessary if there are changes to the status of cultural resources and/or administrative activities.

23) Is the installation required to have an Integrated Cultural Resources Management Plan (ICRMP)? Installations with very limited or no cultural resources may request a variance from the requirement. If an installation has requested but not received a variance, they are to answer this question "yes" because the ICRMP is a requirement unless the variance has been received from HQDA. If an installation anticipates requesting a variance, they must answer "yes" to this question until such a request is made and the variance is received. A "no" response is not permitted until a variance has been granted by HQDA IAW AR 200-1, 4-1(d). Yes

24) If a variance was received, in what year was it received?
Not applicable

25) Is the installation operating under a completed ICRMP? Answer "Yes" if the installation is currently operating under an ICRMP, even if it is due for an update. Answer "No" if the installation is required to have an ICRMP, but has either not initiated the process, or is still completing its first plan
Yes

26) When will the ICRMP be finished or next updated? Indicate the FY in which the installation will either a) finish the ICRMP for the first time, or b) update its existing ICRMP within the 5-year cycle. FY13

27) The installation has an NHPA Programmatic Agreement (PA) for daily operations? No

28) If yes, in what year was the PA signed? N/A

29) Does the PA have a sunset clause? N/A

30) In what month does the PA expire? N/A

31) In what year does the PA expire? N/A

32) Please provide the title and consulting parties of the PA. N/A

Inventory of Archaeological Resources

Archaeological inventories are required for land that could be affected by undertakings under NHPA; an undertaking is defined as 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; and those requiring a Federal permit, license or approval.¿ Archaeological inventory involves actual field identification of archaeological sites, sufficient to judge whether they are eligible for listing in the National Register of Historic Places. An archaeological inventory includes examination of areas on the installation with reasonable potential for archaeological sites, excluding such areas as impact or safety hazard zones. This includes Federally-owned, state, leased, special use permit, or other special circumstances land where the installation is required to implement NHPA Section 106 review of the impacts a proposed undertaking would have on historic properties. For questions 30-33, consider all lands under the installation jurisdiction (i.e. the entire state for Army National Guard) as one property.

33) Is the installation responsible for the archaeological inventory of the land it uses or owns? Answer 'yes' if the installation would have to conduct an archaeological survey if that land would be affected by an undertaking, whether or not one is planned for the near term.

Yes

34) Identify the completion status of the archaeological inventory of that land. Mark 'complete' if all available lands have been inventoried. Mark 'partially complete' if only a portion of the available lands has been inventoried. Mark 'not initiated' if lands have not been inventoried at all, but should be.

Complete

35) How many acres on your installation are accessible for archaeological inventory? Lands accessible for inventory are the total acreage of the installation (or state or RRC, as applicable), minus surface danger zones, acreage underwater, or other inaccessible areas.

36) How many acres (total) on your installation have been inventoried for archaeological resources?

Inventory of Historic Buildings and Structures

Historic Buildings and Structures Inventory involves actual field identification of historic buildings and structures, sufficient to judge whether they are eligible for listing on the National Register of Historic Places. Buildings over 50 years of age, as well younger buildings that may be eligible for the National Register under the exceptional importance criteria, are included in the inventory. For Army National Guard, this includes all buildings and structures coded within PRIDE that are Federally-owned or able to receive federal funds.

37) Is the installation responsible for the inventory of historic buildings or structures it uses or owns? Answer "yes" if the installation would have to conduct a building survey if those buildings would be affected by an undertaking, whether or not one is planned for the near term.

Yes

38) Identify the completion status of all historic building and structure inventories. Mark "complete" if all available buildings and structures over 50 years old have been inventoried. Mark "partially complete" if only a portion of the available buildings and structures over 50 years old has been inventoried. Mark "not initiated" if buildings and structures over 50 years old have not been inventoried at all, but should be

Partially Completed

Native American Cultural Resources

Sacred sites are defined as any "specific, discrete, narrowly delineated location, 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 ceremonial use by, an Indian religion" (EO 13007). Properties of traditional religious or cultural importance to an Indian tribe or Native Hawaiian organization may be determined to be eligible for inclusion on the National Register of Historic Places, as referenced in NHPA Section 101(d)(6).

39) List the Federally recognized Indian tribes or Native Hawaiian organizations that are associated with the installation.

40) Are access and protection procedures required and in place for Native American sacred sites (as defined in EO 13007) or properties of traditional, cultural or religious importance to Federally-recognized Indian tribes or Native Hawaiians (as defined in NHPA)? For the National Guard and Reserve, this includes sites and properties on both Federal and state land.

No

41) Does your installation have "cultural items" as defined by the Native American Graves Protection and Repatriation Act (NAGPRA) in collections in Federal possession or control? "Cultural items," as defined by NAGPRA, include human remains, funerary objects, sacred objects and objects of cultural patrimony that have been discovered on Federal lands.

No

42) If your installation has "cultural items" as defined by NAGPRA in collections, has consultation for repatriation been initiated for those items? Under NAGPRA, Federal agencies must consult with tribes affiliated with the area in which the cultural items were found, in order to repatriate or otherwise handle the items. If the installation has "cultural items" as defined by NAGPRA, determine if consultation for repatriation has been initiated, and answer "yes" or "no".

No

Section 6 summaries under NAGPRA are required to have been completed by museums and Federal agencies with possession or control over holdings or collections of Native American unassociated funerary objects, sacred objects, or objects of cultural patrimony. Summaries were to be completed by November 16, 1993 and should have been followed by consultation with tribal government and Native Hawaiian organization leaders and traditional religious leaders.

43) Is your installation required to do a NAGPRA summary per Section 6 of the Act and 43 CFR 10.8?

No

44) Has your installation completed its NAGPRA summary per Section 6 of the Act and 43 CFR 10.8?

No

45) Has your installation performed the required consultation for NAGPRA summaries per 43 CFR 10.8(d)?

No

46) Has your installation completed the notification requirements for NAGPRA summaries per 43 CFR 10.8 (f)?

No

Section 5 inventories under NAGPRA were to have been completed by November 16, 1995, by museums and Federal agencies which have possession or control over holdings or collections of Native American human remains and associated funerary objects using information possessed by the museum or Federal agency, identifying, to the extent possible, the geographical and cultural affiliation of such item(s). Inventories should be completed in consultation with tribal government and Native Hawaiian organization officials and traditional religious leaders.

47) Is your installation required to do a NAGPRA inventory per Section 5 of the Act and 43 CFR 10.9?

No

48) Has your installation completed a NAGPRA inventory per Section 5 of the Act and 43 CFR 10.9?

No

49) Has your installation performed the required consultation for NAGPRA inventories per 43 CFR 10.9(b)?
No

50) Has your installation completed all notification requirements per 43 CFR 10.9(e)?
No

51) If your installation has completed its NAGPRA summary and inventory as required by 43 CFR 10.8 and 10.9, has your installation subsequently received a new holding or collection or located a previously unreported current holding or collection that may include human remains, funerary objects, sacred objects or objects of cultural patrimony as defined by NAGPRA?
NA

General

52) In the past year, has the installation or one or more stakeholders sought the intervention of the Advisory Council on Historic Preservation on a contested historic preservation issue?
No

53) Please provide any comments on changes in any of the data from previous fiscal year, or other issues, that will assist in HQDA's review of the data.

SAMPLE
MEMORANDUM OF AGREEMENT

AMONG
THE NATIONAL GUARD BUREAU,
XXXX ARMY NATIONAL GUARD

AND
THE XXXX STATE HISTORIC PRESERVATION OFFICE
FOR THE
XXXXX (Title of the project) PROJECT
(insert year)

WHEREAS, the National Guard Bureau (ARNG), as a federal agency, is required to comply with the National Historic Preservation Act (16 U.S.C. §470f) (NHPA), and the ARNG provides federal funding and guidance to state Guard organizations; and

WHEREAS, the XXXX Army National Guard (XXARNG) intends (discuss the project) located in (City), (County), (State), using both federal and state funding sources. The buildings were constructed (indicate the construction date(s), is owned and operated by the state of XXXX; and

WHEREAS, the XXARNG has evaluated the (building name) as eligible for inclusion in the National Register of Historic Places (NRHP) and received concurrence with this evaluation from the XXXX State Historic Preservation Office (XX SHPO). The building(s) are eligible for the NRHP due to (insert reason). and that the XXARNG has determined that the (discuss project) will thus have an adverse effect upon this historic property; and

WHEREAS, the XXARNG has consulted with the XX SHPO pursuant to Section 800.6(b) of (36 CFR Part 800), *Protection of Historic Properties* implementing §106 of the NHPA; and

WHEREAS, the XXARNG has determined that there are no Federally recognized Indian tribes that attach traditional religious and cultural importance to the structure and landscape within the area of potential effects. (note: If the undertaking will affect such sites, additional WHEREAS clauses and stipulations will need to be included to reflect proper tribal consultation and resolution of adverse effects with tribal involvement); and

WHEREAS, the ARNG will follow the stipulations outlined in the 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 dated 07 Jun 86 for the demolition of World War II Temporary Buildings, as amended on 05 May 91; and

WHEREAS, the XXARNG has afforded the public an opportunity to comment on the mitigation plan for the (insert project title) through completion of (indicate type of NEPA documentation ex. REC, EA or EIS) pursuant to the National Environmental Policy Act (40 CFR Part 1500-1508); (note: if a REC is prepared, the installation must make additional efforts at including the public in the process, and should insert language indicating what those efforts were example verbiage -in the case of a REC the XXARNG will invite to comment, by letter, the organizations determined to have an interest in this project) and

WHEREAS the XXARNG in consultation with (insert state name) SHPO, established the area of potential effect (APE) as defined at 36 CFR §800.16(d), identified and evaluated (insert buildings) within the APE as being eligible for the National Register, and determined that the proposed undertaking would adversely affect such buildings. There are no other properties within the APE considered eligible for the National Register; and

WHEREAS the XXARNG by letter dated (insert date of letter sent to ACHP) invited the Advisory Council on Historic Preservation (ACHP) to participate in this consultation per 36 CFR §800.6 (a) (1) and the ACHP has declined/agreed (select one) to participate in consultation by letter dated (insert date ACHP declined/agreed (select one) to participate); and

(use for demolition projects only) WHEREAS the XXARNG has determined that adaptive reuse or any other alternative to save (insert building name and number(s)) is not economically feasible; and

WHEREAS the XXARNG, in consultation with the XX SHPO, has determined that there are no prudent or feasible alternatives for the project scope or location.

NOW, THEREFORE, the XXARNG and the XX SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The XXARNG will ensure that the following measures are implemented:

I. Mitigation of Adverse Effects on (insert title of project)

A. Public Participation. The NEPA process will be used to solicit public participation. The XXARNG shall ensure that the following measures are carried out in order to afford the public an opportunity to participate in the mitigation to be carried out under Stipulation B:

1. The XXARNG will invite, by letter, the (insert organization(s) name(s) invited to participate) to participate in the project. The XXARNG will, upon request, provide additional information to the public about this project and arrange meetings with individuals or groups to provide more information about the proposed (renovation, demolition, etc.) prior to implementation of this MOA.

B. After consultation with the (insert state) SHPO a determination will be made regarding the appropriate Historic American Building Survey (HABS) level will be performed. (if applicable insert other mitigation measures agreed upon).

1. Recordation Report will include the following:

2. The XXARNG shall ensure that all mitigation listed in (1) above is completed and submitted to the XX SHPO and the (insert the name of the concurring party as applicable) prior to the (insert project type ex. demolition, renovation, etc) of the (insert building(s) types). Creation of (insert mitigation agreed upon).

a. *Preparation of a historic context for the (insert the building(s) name(s)) and the history of the XXARNG in (insert site location), to be based on information obtained from existing literary and archival sources.*

b. *(Insert mitigation agreed upon - ex. display, etc)*

c. *The XXARNG shall ensure that the (list mitigation) are completed prior to the (insert type of activity ex. demolition, renovation, etc) of the (insert type of building(s)).*

C. *Design Review of Plans for (insert building type). The XXARNG also will provide both the XX SHPO and the (insert consulting party as applicable) with the opportunity to review the designs for the new (insert building type) prior to those designs being put out for contractor bids. This design information is to be treated as confidential; disclosure, distribution, or sharing of the design information, in whole or in part, to any party that is not a signatory to this MOA, is strictly prohibited.*

II. Administrative Stipulations

- A. Definition of signatories. For the purposes of this MOA the term "signatories to this MOA" means the ARNG, XXARNG and the XX SHPO, each of which has authority under 36 CFR 800.6(c)(8) to terminate the MOA if agreement cannot be reached regarding an amendment.
- B. Professional supervision. The XXARNG shall ensure that all activities regarding research and reporting are carried out pursuant to this MOA are carried out by or under the direct supervision of a person or persons meeting at a minimum the *Secretary of the Interior's Professional Qualifications Standards for Architectural History* (36 CFR Part 61).
- C. Alterations to project documents. The XXARNG shall not alter any plan, scope of services, or other document that has been reviewed and commented on pursuant to this MOA, except to finalize documents commented on in draft, without first affording the signatories to this MOA the opportunity to review the proposed change and determine whether it shall require that this MOA be amended. If one or more such party (ies) determines that an amendment is needed, the signatories to this MOA shall consult in accordance with 36 CFR 800.6(c) (7) to consider such an amendment. The signatories will have thirty days to consider the amendment. The XXARNG will notify in writing everyone when the consultation with the signatories has been completed and the outcome of the consultation
- D. Anti-Deficiency Act compliance. All requirements set forth in this MOA requiring expenditure of Army funds are expressly subject to the availability of appropriations and the requirements of the Anti-Deficiency Act (31 U.S.C. Section 1341). No obligation undertaken by the Army under the terms of this MOA shall require or be interpreted to require a commitment to expend funds not appropriated for a particular purpose.
- E. Dispute Resolution.
 - 1. Should the XX SHPO object in writing to any actions carried out or proposed pursuant to this MOA, the XXARNG will consult with the XX SHPO to resolve the objection. If the XXARNG determines that the objection cannot be resolved, the XXARNG will request further comments from the ACHP pursuant to 36 CFR § 800.7. If after initiating such consultation the XXARNG determines that the objection cannot be resolved through consultation, the XXARNG shall forward all documentation relevant to the objection to the ACHP, including the XXARNG's proposed response to the objection. Within 30 days after receipt of all pertinent documentation, the ACHP shall exercise one of the following options:
 - a. Advise the XXARNG that the ACHP concurs in the XXARNG's proposed response to the objection, whereupon the XXARNG will respond to the objection accordingly;
 - b. Provide the XXARNG with recommendations, which the XXARNG shall take into account in reaching a final decision regarding its response to the objection; or
 - c. Notify the XXARNG that the objection will be referred for advisory comments of the ACHP in accordance with 36 CFR 800.7(b).
 - 2. Should the ACHP not exercise one of the above options within 30 days after receipt of all pertinent documentation, the XXARNG may assume the ACHP's concurrence in its proposed response to the objection.
 - 3. The XXARNG shall take into account any of the advisory comments of the ACHP provided in accordance with this stipulation with reference only to the subject of the objection; the XXARNG's responsibility to carry out all actions under this MOA that are not the subjects of the objection shall remain unchanged.

4. At any time during implementation of the measures stipulated in this MOA, should an objection pertaining to this MOA or the effect of the undertaking on historic properties be raised by a member of the public, the XXARNG shall take the objection into account.

F. Termination.

1. If the XXARNG determines that it cannot implement the terms of this MOA, or if the ARNG or XX SHPO determines that the MOA is not being properly implemented, the XXARNG, the ARNG or the XX SHPO may propose to the other signatories to this MOA that it be terminated.
2. The party proposing to terminate this MOA shall so notify the other two signatories to this MOA, explaining the reasons for termination and affording them thirty (30) days to consult and seek alternatives to termination.
3. Should such consultation fail the XXARNG, ARNG or the XX SHPO may terminate the MOA. Should the MOA be terminated, the XXARNG shall either:
 - a. Consult in accordance with 36 CFR 800.6 to develop a new MOA; or
 - b. Request the comments of the ACHP pursuant to 36 CFR 800.7.
4. If the terms of this agreement have not been implemented by (insert number of year(s)) after the date of the signatures in Section III below, this MOA shall be considered null and void. In such event the XXARNG shall so notify the signatories to this agreement, and if it chooses to continue with the undertaking, shall re-initiate review of the undertaking in accordance with 36 CFR Part 800.

G. Execution.

1. Until a signed copy of the MOA has been filed with the ACHP the MOA is not valid. A signed copy will also be sent to the Department of the Army, Assistant Chief of Staff for Installation Management for their files.
2. Execution of this MOA is intended to evidence the XXARNG's compliance with §106 of the NHPA. This fulfills Section 106 for this action.

SAMPLE
MEMORANDUM OF AGREEMENT

AMONG
THE NATIONAL GUARD BUREAU,
XXXX ARMY NATIONAL GUARD

AND
THE XXXX STATE HISTORIC PRESERVATION OFFICE
FOR THE
Insert Project Title
(insert year)

Signature Page

NATIONAL GUARD BUREAU

By: _____
JEFFREY G. PHILLIPS
Colonel, US Army
Chief, Environmental
Programs Division

Date: _____

XXXX ARMY NATIONAL GUARD

By: _____
xxxxx x. xxxxxxxxxxxx
Major General, XXXX Army National Guard
The Adjutant General

Date: _____

XXXX STATE HISTORIC PRESERVATION OFFICER

By: _____
xxxxxx x. xxxxxxxxxxxx
State Historic Preservation Officer

Date: _____

CONCURRING PARTIES: (as applicable)

XXXXXX HISTORICAL COMMISSION or XXXX Federally recognized Indian tribe(s) or Native Hawaiians

By: _____
xxxxx x. xxxxxxxxxxxxxxxxxxxx
Title

Date: _____

Cultural Resources Management

An Introductory Briefing

What are cultural resources?

Cultural resources include those parts of the physical environment – natural and built – that have cultural value to some group. In the broadest sense, cultural resources also include social institutions, beliefs, practices, and perceptions of what makes our environment culturally comfortable.

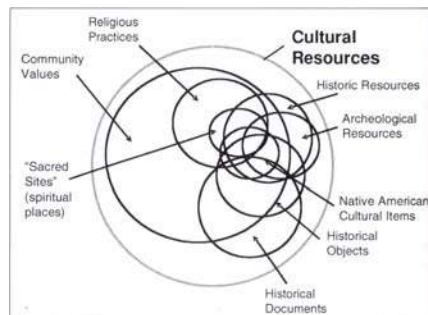
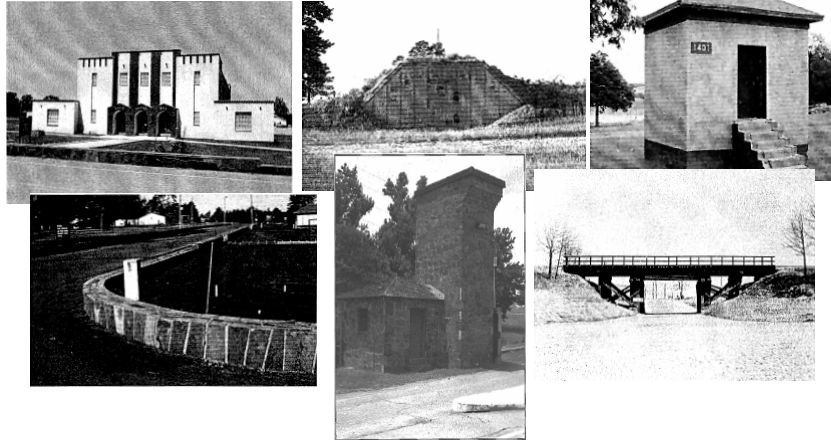


Figure 1. The universe of cultural resources and its component parts
(Taken from King 2004)

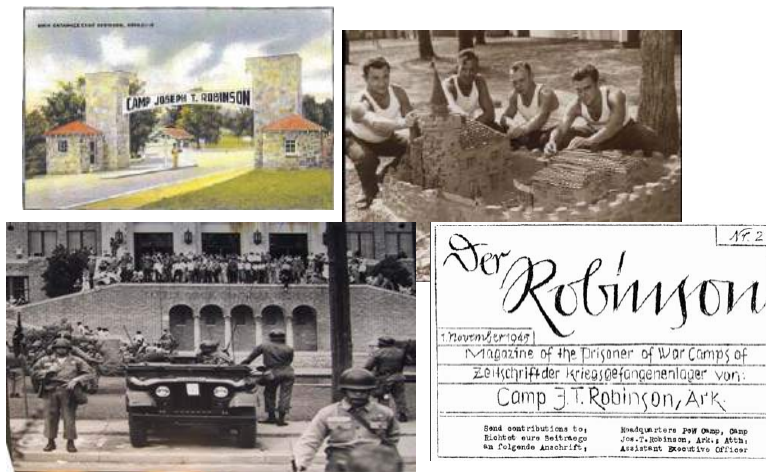
What are cultural resources? (cont'd)

Historic Buildings, Structures, and Objects



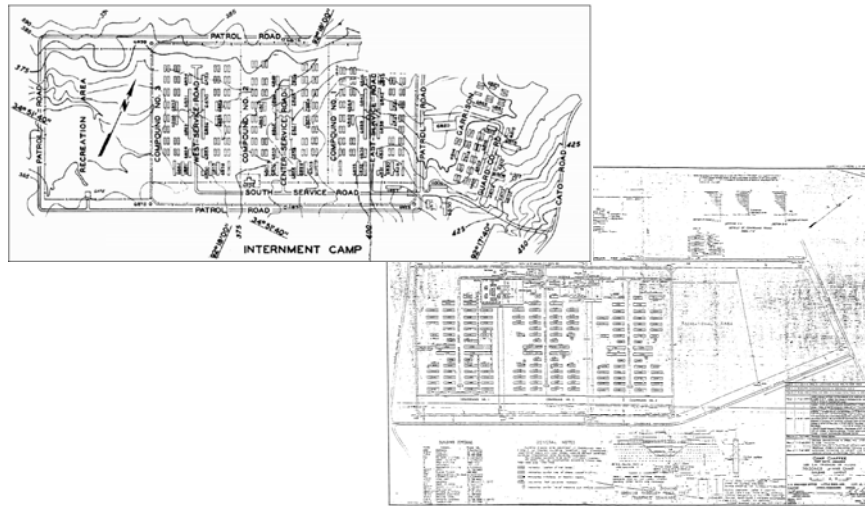
What are cultural resources? (cont'd)

Historic Photographs, Documents, and Memorabilia



What are cultural resources? (cont'd)

Cultural and Historic Landscapes



What are cultural resources? (cont'd)

Traditional Cultural Properties, Sacred Sites, and Cultural Uses of the Natural Environment

Why do I need to care about cultural resources?

Besides the obvious rationale that conservation of cultural resources is “the right thing to do”, the ARARNG needs to care about cultural resources for two primary reasons:

1. Federal, state, and DoD legislation and regulations mandate certain protections and conservation policies for cultural resources in Air Force control; and
2. Many activities that the ARARNG undertakes as part of its mission have the potential to negatively impact cultural resources (e.g., training, construction, demolition, repairs and maintenance, remediation)

Benefits of Cultural Resources Management

From the perspective of the ARNG mission, the Commander's Guide, titled *The Benefits of Cultural Resource Conservation* (DoD Legacy Program 1994) states that:

- When managed properly, cultural resources are assets that can effectively support mission requirements;
- Conservation of cultural resources is both an economical and energy-efficient method of managing DoD resources;
- Cultural resources have strong social and emotional meaning to past and present military personnel, and to the larger community outside the DoD;
- Cultural resources can be used effectively as educational and training tools by the military services; and
- Conservation of cultural resources is appropriate and consistent with the DoD's current budget limitations.

Benefits of Cultural Resources Management (cont'd)

The Commander's Guide goes on to note that, "often, the conservation of these properties is viewed as being inconsistent with the military mission and a drain on personnel and financial resources;" however, "[in fact] cultural resources can benefit both the mission and the military budget if they are properly managed and integrated into the operations of the agency, installation, or base. What is needed is an understanding of the value of the resources, the imagination to see how they can be used, and a willingness to undertake the task." (Commander's Guide 1994:1).

Benefits of Cultural Resources Management (cont'd)

- Cultural resources commemorate the nation's history, including the contributions of the military's role in that history.
- The military's places and objects of cultural significance are the threads of our heritage of settlement, migration, conflict, and commerce.
- Military installations acquire deeper meaning to the men and women who have passed through their gates to be trained; these places conjure up past associations, stirring emotions and memories. They are touchstones of a shared experience.
- Finally, the military's cultural resources are an integral part of a community's cultural heritage and local citizen value their preservation. If installations are good stewards of their resources and work cooperatively with local communities for preservation, they will be viewed as good neighbors.

Laws and Regulations

Federal Laws and Regulations

- *Antiquities Act of 1906*
- *National Historic Preservation Act (NHPA) of 1966, as amended*
- *National Environmental Policy Act (NEPA) of 1969*
- *Archaeological and Historic Preservation Act (AHPA) of 1974*
- *Archaeological Resources Protection Act (ARPA) of 1979*
- *Native American Graves Protection and Repatriation Act (NAGPRA) of 1990*
- *American Indian Religious Freedom Act (AIRFA)*
- *Curation of Federally Owned/Administered Archaeological Collections (36 CFR 79)*
- *Executive Order 11593: Protection and Enhancement of the Cultural Environment (1971)*
- *Executive Memorandum of April 29, 1994: Government-to-Government Relations with Native American Tribal Governments*
- *Executive Order 13007: Indian Sacred Sites (1996)*
- *Executive Order 13175: Consultation and Coordination with Indian Tribal Governments (2001)*
- *Executive Order 13287: Preserve America (2003)*
- *Executive Order 13327: Federal Real Property Asset Management (2004)*

Law and Regulations (cont'd)

DoD Regulations Governing Cultural Resources

- *Office of the Secretary of Defense, Annotated Policy Document for the American Indian and Alaska Native Policy (27 October 1999)*
- *DoD Instruction 4715.3 – Environmental Conservation Program*
- *DoD Instruction 4710.02 - DOD Interactions with Federally-Recognized Tribes*
- *DoD Minimum Anti-Terrorism Standards for Buildings (UFC 4-010-01)*
-

**Actions that can affect cultural resources
(these require review by the CRM) :**

- Maintenance and repair of buildings, structures, and landscape elements, ***especially buildings and structures that are 50 years old*** (or near that age);
- Military training projects that involve ground disturbance
- New construction, including construction of roads and paths, as well as facilities
- Soil investigation and remediation projects
- Restoration projects
- Renovation or alteration of historic buildings, or buildings within historic districts
- Demolition of historic buildings (NOTE: these types of buildings may also contain asbestos or LBP, so be cautious with any demolition or repair work)
- Disposal of historic buildings or land containing archeological sites or sacred sites through transfer
- Mothballing: temporarily closing a building to protect it from weather and vandalism