

**APPENDIX F:**

**CULTURAL RESOURCES: HISTORIC CONTEXTS  
AND CONSULTATION LETTERS**





**APPENDIX F:****CULTURAL RESOURCES: HISTORIC CONTEXTS  
AND CONSULTATION LETTERS****F.1 ANNISTON ARMY DEPOT PREHISTORIC AND HISTORIC CONTEXT****F.1.1 Prehistory**

The prehistoric and historic context for known and potential cultural resources at Anniston Army Depot (ANAD) has been discussed by Dye (1984), U.S. Army Corps of Engineers (COE 1997), and Jordan and Whitley (1999) and is only briefly summarized here. Although the Coosa Valley has a long history of occupation, the uplands that form ANAD were peripheral to the main areas of occupation. Except for areas excluded for safety reasons, all of the undisturbed areas of ANAD have been subject to some level of archaeological investigation. Those surveys indicate that prehistoric populations hunted and gathered in the area, but very likely left behind only temporary campsites rather than more permanent settlements.

The earliest potential occupation of the area occurred during the Paleo-Indian Period (12,000 – 8,000 B.C.), when small kin-based hunting bands may have passed through the area, leaving the ephemeral remains of temporary campsites. During the succeeding Archaic Period (7,000 – 1,000 B.C.), a wider range of resources were exploited and settlement patterns varied seasonally. Base camps were located in floodplains. Upland areas such as those at ANAD were used only for seasonal short-lived hunting camps. Fifteen Archaic sites have been identified at Pelham Range, just north of ANAD, but none has been found on ANAD itself (COE 1997). The succeeding Woodland Period (1,000 B.C. – A.D. 900) is characterized by increased reliance on agriculture, sedentism, more elaborate sites and material culture, and regional integration. No Woodland sites are known from ANAD (COE 1997). The final florescence of southeastern Native American cultures occurred during the Mississippian Period (A.D. 900 – 1500). Chiefdoms emerged in this period, a development characterized by increased trade, reliance on agriculture, and more elaborate settlements, including ceremonial centers.

**F.1.2 Ethnohistory**

European contact with the Native Americans of the Coosa Valley began in 1540, when Hernando de Soto encountered Mississippian settlements there. Over the next two centuries, increased European contact drastically altered the structure of the Native American population. Native Americans became increasingly dependent on European metal tools and firearms and were caught up in the competition between European powers. British traders arrived in the 1600s, and the French, who previously were established at Mobile, constructed a fort at the

confluence of the Coosa and Tallapoosa Rivers in 1717. As contact with Europeans grew, the introduction of disease and warfare drastically reduced Native American populations. Descendants of the Mississippian chiefdoms, including the Coosa, banded together and migrated south, forming the Creek Confederacy. The Upper Creek inhabited the ANAD region, establishing towns along the Coosa River. Euro-American settlement in the area west of the Coosa began in earnest after 1814, when the Red Sticks, a confederation of Creeks that (under the influence of Tecumseh) sided with the British in the War of 1812, were removed from that area. Conflicts between the Creeks and the settlers increased. In 1825, the Upper Creeks ceded their lands east of the Mississippi. In 1832, Benton County (now Calhoun County) was formed from Creek lands to encourage Euro-American settlement. Euro-American farmers traveled to the territory along Creek trading paths. They built their farmsteads on high ground near streams or springs where there was room for cattle and hogs to range. In 1836, the remaining Creeks were removed from the area and marched to Oklahoma, with the loss of thousands of lives (Jordan and Whitley 1999). Interest among their descendants in their southeastern homelands is increasing.

### **F.1.3 History**

Benton County contained iron ore, timber, and water power — the three components necessary for the production of iron in 19th-century America — and was well situated to supply the more established areas with iron tools. The county became a center of iron production in the South and was important to Confederate industrial production during the Civil War. Although the early mills were destroyed during the war, new mills were established later. The local availability of cotton also led to the establishment of textile mills. The planned community of Anniston was established in 1872 to serve as a company town for the Woodstock Iron Co. Anniston grew as an industrial center. Building on this base, Anniston grew into a center for the manufacture of cast iron pipes and fittings (Jordan and Whitley 1999), with local farmers profiting from the new market for their goods. The lands occupied by ANAD were only on the fringes of this development. After the Civil War, Bynum Station was founded along the Georgia Pacific Railroad at ANAD's southern boundary. A 1910 plat of the area shows that the Woodstock Iron and Steel Company owned much of the land constituting Bynum Station, but iron mining was limited to two locations on the eastern edge of ANAD. Calhoun County soil survey maps (1961) show two other mining sites within ANAD's boundaries.

Military use of the area began in 1898 with the establishment of Camp Shipp at Blue Mountain. Camp Shipp lasted for only a year, but, in 1917, Camp McClellan was established at Anniston to train U.S. troops for World War I. Camp McClellan became Fort McClellan in 1929, and permanent construction began in 1933. During World War II, 500,000 troops were trained at Fort McClellan. However, Fort McClellan proved unsuitable as an arms depot. In 1940, as part of the U.S. arms buildup prior to World War II, 13,000 acres, including Bynum Station, was acquired for the Anniston Ordnance Depot (AOD). The construction of AOD began in 1941, and the facility opened in 1942. The construction of the many rows of munitions storage igloos required substantial earth moving over much of the site. Topsoil was scraped up and then piled over the concrete igloo structures. At the height of World War II, 6,700 people were employed at

AOD. After the war, a program of demilitarization and renovation adapted the site to its new functions of tank and artillery overhaul and munitions maintenance. In 1968, with the deactivation of the office of Chief of Ordnance, the site was renamed the Anniston Army Depot. It includes 15,000 acres, and its mission is to receive, store, and issue munitions, and to maintain combat vehicles and artillery (Hightower 1984).

#### **F.1.4 Summary of Archaeological Surveys and Resources**

Because the ANAD area presented few opportunities for permanent settlement and because of significant ground disturbance, the potential for the occurrence of archaeological resources at ANAD is limited. Industrialization of the Anniston area began in the mid-19th century. Four mines and numerous gravel pits or quarries now within ANAD's boundaries are indicated on soil survey maps (Harlin and Perry 1961). In the 1940s, when ANAD was established, large sections of the site were disturbed during the construction of the storage igloos and industrial areas. The main potential for preserved archaeological resources lies in certain favorable locations within the buffer zones surrounding and separating the storage blocs. An initial cultural resources reconnaissance of ANAD concluded that because of the restricted public access to ANAD, there was a good possibility that intact cultural resources could be located in these areas (Dye 1984). Surveys of the less disturbed areas were begun in 1984.

The U.S. Army Corps of Engineers, Mobile District, conducted six archaeological surveys at ANAD between 1984 and 1997. These included surveys of proposed construction sites, timber sale lots, and areas considered to have a high potential for yielding archaeological remains (COE 1997). Surveys of the proposed construction sites for the M55 Rocket Demilitarization Plant and the Demilitarization Project were conducted in 1984 and 1991. No cultural resources were recorded in these surveys (COE 1984, 1991). In 1992, 2,262 acres of timber sale plots was surveyed. This survey focused on areas around sinks and springs, because of their high to moderate potential for yielding cultural resources. Again, no cultural resources were recorded. Eight additional high-potential areas were surveyed in 1993. Three prehistoric sites, three historic cemeteries, and one historic settlement site were recorded in that survey. A final survey of 50 acres just outside the southeastern gate of ANAD was conducted in 1996. That survey recovered isolated prehistoric finds from the plowzone, but identified no intact sites. Areas restricted for safety or security reasons were not surveyed. Restricted areas include the Chemical Limited Area, areas within 1,200 ft of the Burning Ground, and areas within 2,400 ft of the Demolition Pit (COE 1997). Of the resources encountered in these surveys, one prehistoric site, the three historic cemeteries, and the settlement site (the Wilkinson Complex) were deemed to have potential for inclusion on the *National Register of Historic Places* (NRHP). Phase II excavations were conducted at a cave site (Field Site 1), in 1998; it was determined to be not eligible for listing on the NRHP (Jordan and Whitley 1999).

In 1997, the Alabama State Historic Preservation Officer (SHPO) concurred that the necessary surveys of "all areas within ANAD considered suitable for archeological survey" had been completed (COE 1997). However, since these surveys were conducted at different levels of

intensity, with the broader surveys only checking areas with the highest potential for yielding sites, the Alabama SHPO may require a more intensive survey of any selected construction site before concurring on a no adverse effect determination for a project.

### **F.1.5 Summary of Evaluations of Historic Structures**

ANAD was constructed beginning in 1941 as part of Phase A of World War II depot construction. This activity was during the Protective Mobilization Phase of the war and thus played an important role in the logistical support of the Army during the critical early months of the war (Whelan et al. 1997). Because of their potential significance in the U.S. arms buildup in preparation for World War II, ANAD structures constructed before 1946 were evaluated in 1984. No structures were recorded as meeting Army criteria for important historical structures or eligibility criteria for the NRHP at that time (Hightower 1984). Documentation showing SHPO concurrence with that determination had not yet been found at the time this environmental impact statement (EIS) was being prepared. Furthermore, it does not appear that an evaluation of ANAD Cold War properties has been undertaken.

### **F.1.6 Summary of National Register of Historic Places Properties near ANAD**

Nearly 100 properties within 30 mi (50 km) of ANAD are listed on the NRHP (list available in Wescott 2001). Five counties in Alabama fall within the 30-mi (50-km) radius of ANAD — Calhoun, Clay, Cleburne, Etowah, and Talladega. Many of these properties are located in the city of Anniston. The NRHP-listed properties include industrial (mills, plants), commercial (banks, stores, theaters, downtown historic districts), residential (houses and districts), and institutional (schools, libraries, churches, courthouses, post offices) buildings and other structures (bridges, railroad depots).

## **F.2 PINE BLUFF ARSENAL PREHISTORIC AND HISTORIC CONTEXT**

### **F.2.1 Prehistory**

Archaeological investigations in the region of the Pine Bluff Arsenal (PBA) have identified prehistoric sites ranging from the Paleo-Indian Period (13,000 B.C. – 10,000 B.C.) to the Mississippian Period (A.D. 1000 – A.D. 1500). Summaries of archaeological research conducted in southeastern Arkansas can be found in reports by Jeter and co-workers (Jeter 1982; Jeter et al. 1982, 1989). The local distribution of prehistoric sites is concentrated along major rivers and tributary streams and their associated terraces. The areas of highest probability for containing prehistoric material (on the basis of information from past archaeological surveys) are along the Arkansas River terraces, within the lower portions of the active tributary floodplains,

and within the relic tributary floodplains (Bennett et al. 1993). Areas associated with historic activities (farming and historic settlement) and tributary valley slopes have a low probability for occurrence of intact prehistoric material. Earth-moving activities associated with development and operations at PBA have been most heavily concentrated along the Arkansas River terraces, thus decreasing the likelihood of discovering intact buried archaeological deposits in those areas.

### **F.2.2 Ethnohistory**

Ethnohistorically, horticulturalist groups, including the Quapaw and the Tunica, used the confluence of the Arkansas and Mississippi River valleys. (See Morse and Morse 1983 for a discussion of pre-Euro-American culture histories.) These groups were greatly affected by disease and displacement resulting from contact with Europeans in the 18th century (Leitch 1979). The Quapaw were the predominate group occupying the region of PBA in the early 19th century. An 1818 treaty created a reservation, including what is now the site of PBA, for the Quapaw; however, this area was ceded to the United States in 1824 (Bennett et al. 1993). The native groups from this region were relocated to Oklahoma and Kansas by the mid-19th century.

### **F.2.3 History**

The general history of southeastern Arkansas is focused on the Mississippi and Arkansas Rivers. The first European excursions into the region were by the Spanish and French. European activity increased with the establishment of the Arkansas Post in 1686. Initially, the region was used primarily by hunters and traders operating along the Arkansas River. The first report of farming in the Arkansas River area is in the 1790s (Bennett et al. 1993). The United States acquired this region in 1803 as part of the Louisiana Purchase. By 1825, the area surrounding what is now PBA was the location of several plantations. The larger plantations located in the Arkansas River bottom lands were worked predominately by slave labor, while smaller family farms were located along the tributaries. The region remained a rural farming area, with the Arkansas River serving as the primary means of transportation, until after the Civil War. Agricultural practices were altered after the Civil War from the use of slave labor to the tenant farming system. However, the main economy remained agriculture. The McCoy, MacFadden, and McGregor plantations were established along the eastern edge of the future PBA boundaries during this period. The introduction of railroads in the 1870s allowed people to move away from the river without losing access to markets. One of the first rail lines was placed near the western boundary of the current PBA and connected Pine Bluff to Little Rock. Small farming and railroad communities were established along the rail lines. This general pattern continued in the PBA area until the 1940s.

The local distribution of historic archaeological sites is concentrated along transportation features, including railways, rivers, and roads. The two areas of highest probability for occurrence of historic sites are along the Arkansas River terrace and along the route of the railway line that ran along the western boundary of PBA. Some farms are historically reported in

areas that now are in the interior of PBA; however, these areas were heavily modified by PBA activities (Bennett et al. 1993). Likewise, the Arkansas River terraces and the area along the historic railway were also heavily modified by PBA activities, greatly reducing the probability of finding intact historic archaeological deposits.

Construction of PBA began in 1941. The facility was designed to manufacture magnesium- and aluminum-based incendiary munitions but soon expanded to include the production of war gases, smoke munitions, and napalm bombs. Between 1946 and 1950, PBA was placed on standby. During this period the war gas facilities were dismantled. The arsenal began manufacturing incendiary and smoke munitions at the start of the Korean Conflict. The facility has continued to serve this function to present. In 1972, 500 acres of PBA was converted to a National Center for Toxicological Research. The general military history of PBA is summarized by Hess (1984).

#### **F.2.4 Summary of Archaeological Surveys and Resources**

Between 1967 and 1990, about 10,270 acres of PBA was surveyed for archaeological resources. In 1982, Bennett and Stewart-Abernathy surveyed 200 acres; in 1985, the Army Engineer District surveyed 27 acres. Dunn surveyed about 43 acres in 1988, and Archaeological Assessments Inc. surveyed the remaining undisturbed 10,000 acres of the arsenal in 1990 (Bennett et al. 1993). No archaeological sites were identified during the 1982–1988 surveys; 46 archaeological sites were identified in 1990. Seven of those sites were recommended for additional investigations to determine their eligibility to the NRHP. In 2000, those seven sites were investigated by the Arkansas Archaeological Survey (House and Farmer 2000). On the basis of the findings from those excavations, three of the seven sites (3JE285, 3JE307, 3JE312A-C) were determined eligible for listing on the NRHP.

The majority of the prehistoric sites identified during the 1990 survey consisted of highly dispersed lithic scatters along the Arkansas River Terrace. Those scatters lacked diagnostic material. Two prehistoric sites located on the relic floodplains of the Eastwood Bayou (3JE285) and Phillips Creek (3JE290) did contain diagnostic materials and appear to date from A.D. 500 to A.D. 1500 (Bennett et al. 1993). Site 3JE285 was recommended eligible for listing on the NRHP, while 3JE290 was recommended not eligible (House and Farmer 2000).

Evidence of archaeological sites dating to the historic period (1840-1940) was identified during the 1990 archaeological survey. Sites attributed to the 1840-1880 period were located but were found to be heavily disturbed by subsequent activities. Sites dating to the 1880-1940 period appeared to retain greater integrity. Five of the seven sites reserved for further testing date to the later historic period. Two of the five historic archaeological sites (3JE307 and 3JE312A-C) were recommended eligible for listing on the NRHP (House and Farmer 2000). Site 3JE307 is a 1920s era farmstead that was operated by an African American woman. Site 3JE312A-C represents the remains of the 1930s era town of Warbritton.

### **F.2.5 Summary of Evaluations of Historic Structures**

The MacDonald and Mack Partnership conducted a survey and evaluation of historic properties in 1984. The survey examined the 830 extant buildings at PBA in that year. None of the buildings examined met the Army criteria for important historical structures or the eligibility criteria for listing on the NRHP at that time. Documentation showing SHPO concurrence with this determination had not yet been found when this EIS was being prepared. The Cold War properties at PBA have not yet been evaluated for historic significance.

During the 1990 archaeological investigations, three structures pre-dating PBA were identified (Bennett et al. 1993). The first was the commandant's residence, which was a 1930s structure that was modified for reuse by the Arsenal. The structure was determined ineligible for listing on the NRHP because of the alterations it had undergone. Sites 3JE294 and 3JE295 are two pre-1940 structures that were moved from their original locations and had been rehabilitated for use by PBA. No determination of eligibility has been conducted for these two structures, but in general, structures moved from their original location are not typically considered eligible for listing on the NRHP.

### **F.2.6 Summary of National Register of Historic Places Properties Near PBA**

Nearly 280 properties listed on the NRHP are located within 30 mi (50 km) of PBA (list available in Wescott 2001). Six counties in Arkansas fall within the 30-mi (50-km) radius of PBA — Jefferson, Cleveland, Grant, Lincoln, Pulaski, and Saline. The majority of these properties are located in the cities of Little Rock and Pine Bluff. The NRHP-listed properties include commercial (hotels, banks, stores, theaters, downtown historic districts), residential (apartments, houses, and districts), and institutional, including military (schools, churches, courthouses, post offices, armories) buildings and other structures (monuments, memorials, viaducts and overpasses, riverboat). In addition, cemeteries, plantations, battlefields, and archaeological sites (mounds) listed on the NRHP occur within 30 mi (50 km) of PBA.

## **F.3 PUEBLO CHEMICAL DEPOT PREHISTORIC AND HISTORIC CONTEXT**

### **F.3.1 Prehistory**

In archaeological investigations in the Arkansas River Valley, researchers have encountered prehistoric sites (mostly lithic scatters and camp sites) dating from the Paleo-Indian Period (8000 to 5500 B.C.) through the Plains Village Tradition (or Middle Ceramic Period, A.D. 1000 to 1550). The local distribution of prehistoric sites includes locations along major river terraces and tributary streams. The areas of Pueblo Chemical Depot (PCD) that have a high potential for containing prehistoric cultural resources include “ridges covered with eolian sand

and overlooking drainages, lower ridges paralleling intermittent drainages, and blowouts” (Montgomery 1984). Flatter areas within the facility are thought to have less potential for containing sites, as indicated by local prehistoric settlement patterns (derived from the known archaeological record) and partly because of the area’s past use and disturbance by military activity. In general, fewer sites have been found in the open plain areas away from water sources. The administrative area and large bunker area were subjected to major ground disturbance (up to 3 to 6 ft [0.9 to 1.8 m] deep) during construction. The likelihood of finding intact archaeological deposits eligible for listing on the NRHP within these disturbed areas of PCD is very small (Montgomery 1984).

### **F.3.2 Ethnohistory**

Ethnohistorically, horticulturalists and Plains Indian groups, such as the Plains Apache, inhabited the southeast Colorado Plains. The Plains Apache moved south and were replaced by the Utes and Comanches in the 1700s. The Comanches continued southward to occupy the plains south of the Arkansas River. The Cheyenne and Arapahoe, originally from north and east of the Colorado Plains, inhabited the plains north of the Arkansas River by the 1800s. Native American groups from this area were largely relocated to Oklahoma by 1869 (Montgomery 1984).

### **F.3.3 History**

Summaries of the general history of southeastern Colorado and the PCD property before military acquisition are provided in the archaeological reports previously prepared for PCD (Montgomery 1984; Larson and Penny 1995; Foothill Engineering Consultants, Inc. [FEC] 1998). The primary historic themes for the region include discovery and exploration, early colonization and exploitation, and settlement expansion and economic diversification (Montgomery 1984). The Arkansas River played a critical role in the development of the area. Although Spanish explorers may have come close to the area as early as the late 1600s, it was during the early 1800s that fur trappers and traders started establishing a presence in the form of trails along the Arkansas River and its tributaries. The establishment of trading posts (Fort Cass and Bents Old Fort) along the river in the 1830s opened the area to permanent European settlement. The closest historical trail to the depot is the Chico Creek cutoff, established in the late 1850s. The trail starts at the Arkansas River and continues north along PCD’s western boundary.

Military installations, such as Fort Reynolds and Camp Fillmore, were established nearby during the 1860s as the number of settlements began to increase following the Gold Rush of 1859 and the establishment of the Colorado Territory in 1861. A stage-line route from the Booneville stage station to the military bases was established south of PCD; a northern continuation of this line may have been established along Haynes Creek on the eastern periphery of PCD, but this has not been confirmed (Montgomery 1984). Trends of open-range cattle ranching, homesteading, large-scale irrigation projects, and dry-land farming occurred at various

times in the region. During the 1920s, many small cattle ranches were consolidated into larger companies. The land that later became PCD was owned by the Thatcher Land and Cattle Company (formerly the Bloom Cattle Company) (FEC 1998). Agriculture and livestock raising are currently the predominant land uses in southeastern Colorado.

Military occupation of what was then called the Pueblo Ordnance Depot (POD) began in 1943.<sup>1</sup> POD was one of 16 new ordnance depots constructed in 1942 for a World War II mobilization expansion program. The depot's primary function was storage and shipment of ammunition, but it was also used as a medical supply depot.

In the early 1950s, during the Cold War, POD was a distribution center for military supplies for 78 installations in a nine-state region from the Dakotas to Arizona. During that time, POD expanded much of its storage capacity and facilities to accommodate a growing workforce. Also during this time, POD began storing chemical munitions, such as distilled mustard, that were being produced at Rocky Mountain Arsenal near Denver, and the Redstone Arsenal in Huntsville, Alabama. The chemical munitions originally were stored in the igloos in C-Block, but they were later moved to G-Block in the northeastern portion of POD. Nuclear weapons, such as atomic cannon ammunition, were stored in J-Block from 1954 until 1965.

Another expansion occurred in the late 1950s with the addition of a new function for the depot: missile storage and maintenance. In 1961, POD was the "nation's prime depot for maintenance, rebuilding, and storage of the Army's three major missiles [the Redstone, Pershing, and Sergeant] and their systems" (Simmons and Simmons 1998). Hawk and LaCrosse missiles were also serviced at POD.

POD was renamed Pueblo Army Depot (PAD) in 1962. Depot closures in South Dakota and Nebraska in the mid-1960s led to yet another expansion of PAD, making it one of the largest U.S. Army Materiel Command depots in the nation. Activities carried out there continued to diversify; the facility was used to maintain and rebuild vehicles and equipment and to store, maintain, and distribute materials for fixed and floating bridges; it also served as a repository for U.S. Army historical properties.

A phase-down of PAD was announced in 1974 in response to the end of the Vietnam War. Many activities were transferred to other facilities. PAD continued to be a storage supply depot for ammunition and supplies and a maintenance facility for the Pershing missile system. In 1976, PAD became a satellite facility to Tooele Army Depot and was renamed Pueblo Depot Activity (PDA).

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<sup>1</sup> The military history presented here is summarized from Front Range Research Associates, Inc. (Simmons and Simmons 1998).

The main mission of the depot today is the storage of a portion of the nation's chemical weapons stockpile. In 1996, PDA was again renamed to reflect its primary mission; it is currently called Pueblo Chemical Depot (PCD).

### **F.3.4 Summary of Archaeological Surveys and Resources**

Between 1994 and 1996, approximately 11,334 acres of PCD was surveyed for archaeological sites. In 1994, Larson-Tibesar Associates, Inc., surveyed 3,690 acres in the eastern third of PCD, and in the following two years, FEC surveyed 7,644 acres to complete the current inventory of archaeological resources at the PCD. Forty-five sites and 128 isolated finds were recorded. Three sites, 5PE1719, 5PE1930, and 5PE2093 were recommended as eligible for listing on the NRHP; further testing was recommended for 32 of the sites (Larson and Penny 1995; FEC 1998).

More than 80% of the sites recorded at PCD (37 of 45) are located along Chico, Boone, and Haynes Creeks, within or near the edges of the creek valleys (Larson and Penny 1995; FEC 1998). There is a potential for additional prehistoric sites to be present at PCD in the undisturbed portions of the facility.

Archaeological surveys have revealed few sites at PCD pertaining to the historic period, and none of the recorded sites have been directly attributed to the ethnohistoric period. The three historic sites that have been recorded at PCD can be dated to between 1880 and 1942 (when the property was acquired by the government). Twelve of the isolated finds are historic, consisting of glass or ceramic sherds. Additional testing of one of the sites (5PE1735) was recommended. This site, with visible foundations, appears to have been an early 20th century ranch. The other historic archaeological resources were considered not eligible for the NRHP (Larson and Penny 1995; FEC 1998).

### **F.3.5 Summary of Evaluations of Historic Structures**

A survey and evaluation of historic structures at the PCD was initially completed by McDonald and Mack Partnership in 1984. The result of that initial assessment was that none of the 27 buildings evaluated was eligible for listing on the NRHP. The Colorado SHPO found that assessment inadequate and recommended that all structures on PCD be reevaluated. In 1996, Front Range Research Associates, Inc. (FRRA) finalized a historic structures survey of PCD (Simmons and Simmons 1998). The contractor concluded that four districts and one building were potentially eligible for listing on the NRHP. The districts included one World War II district consisting of underground ammunition storage magazines, above-ground ammunition magazines, warehouses, and administration and support buildings; and three Cold War era districts: Hi PODner (or ParDner) Park, the Pershing missile demilitarization area, and the nuclear weapons storage area (within J Block). Building 1, the post headquarters, was the only

building recommended individually eligible for the NRHP. A Programmatic Agreement (PA) was signed in 1997 between the Army, the Colorado SHPO, and the Advisory Council on Historic Preservation stipulating that the recommendations of the FRRA report were acceptable and that the above-mentioned building and districts are eligible (U.S. Army et al. 1997). The PA also states that the unsurveyed structures in the G Block, which house part of the nation's chemical weapon stockpile, are also eligible for the NRHP. The PA further states that documentation of the facilities at PCD has been completed and "no further documentation is required to mitigate the effects of leasing, licensing, and/or disposal of facilities at the Depot" (U.S. Army et al. 1997).

### **F.3.6 Summary of National Register of Historic Places Properties near PCD**

Nearly 60 properties within 30 mi (50 km) of PCD are listed on the NRHP (list available in Wescott 2001). Three counties in Colorado fall within the 30-mi (50-km) radius of PCD — Pueblo, Crowley, and El Paso. Most of the listed properties are located within the city of Pueblo. The NRHP-listed properties include commercial (hotels, stores, downtown historic districts), residential (houses and districts), industrial (mills, warehouses), and institutional (schools, churches, courthouses, orphanages) buildings and other transportation structures (railroad depots, bridges). Archaeological sites (petroglyphs), the Pueblo City Park Zoo, and the City Park Carousel, also listed on the NRHP, are within 30 mi (50 km) of PCD.

## **F.4 BLUE GRASS ARMY DEPOT PREHISTORIC AND HISTORIC CONTEXT**

### **F.4.1 Prehistory**

Archaeological investigations have identified prehistoric sites ranging from the Paleo-Indian Period (10,500 B.C. – 8,000 B.C.) to the Fort Ancient Period (A.D. 1000 – A.D. 1750) in the Blue Grass Army Depot (BGAD) region. Summaries of the prehistoric context of the BGAD region have been provided by Geo-Marine, Inc. (1996), Hockensmith et al. (1988), Muller (1986), and Pollack (1987, 1990). Results of previous archaeological surveys indicate that the local distribution of prehistoric sites in the BGAD region depends on proximity to water features, level terrain, and areas of high elevation that offer expansive views. Such areas, as well as level regions associated with stream confluences, are considered to be high probability locations for prehistoric archaeological sites (Geo-Marine, Inc. 1996). Areas considered to be of low probability for prehistoric archaeological sites lack access to water sources and are generally uneven or contain steep slopes. Areas that have been disturbed by BGAD activities are also considered to be of low potential. Nearly 5,000 acres of BGAD has been significantly altered by depot activities (Geo-Marine, Inc. 1996). There is little or no probability of finding intact archaeological resources in these regions.

### **F.4.2 Ethnohistory**

Ethnohistorically, the Shawnee, Cherokee, and Iroquois were the primary Native American groups associated with the region in which BGAD is now located; the Delaware, Miami, Mingo, Tutelo, and Wyandot tribes also were present in the region before the early 1800s, but in fewer numbers. The largest known Shawnee cultural center in the region was located 30 mi (50 km) north of the current location of BGAD. The Shawnee used the Kentucky River area mainly for hunting. The Cherokee, whose traditional territory is to the east and south of BGAD, also utilized this region mainly for hunting. The aggression of the Iroquois placed constant pressure on the area population. The Iroquois began raiding Shawnee towns for prisoners in the mid-1600s. These raids caused the Shawnee to abandon many of their villages. As a result of the raids, the Iroquois were seen by Euro-Americans as the group who controlled the region. The Euro-Americans took control of the region in 1795 as a result of a treaty with the Iroquois. Shortly after this treaty was signed, the Shawnee, Cherokee, and Iroquois populations relocated west of the Mississippi (Geo-Marine, Inc. 1996).

### **F.4.3 History**

A more detailed history of the BGAD region is provided in the BGAD Cultural Resources Management Plan (Geo-Marine, Inc. 1996). Europeans first entered the BGAD area in the mid-18th century. French and English traders were known to be in the region by the 1750s. With the cessation of the French and Indian War in 1763, the British claimed the lands west of the Appalachians, and intensive land speculation began. Soon, many forts were established to protect the growing number of Europeans in the region. Banta's Fort and Fort Estill were established by the Low Dutch Company within the present boundaries of BGAD in 1781. Estill Station was also built within the current BGAD boundaries in 1782. Madison County was established in 1786. Kentucky achieved statehood in 1798. The region was settled as an agricultural area. A few large estates using slave labor dominated the region. The outbreak of the Civil War in 1861 found Kentucky with divided loyalties. The state remained neutral throughout the conflict. Union forces occupied the northern portion of the state, while the Confederates held the south. A clash between the two armies occurred on the present boundaries of BGAD in late 1861. After the battle, the Confederate forces were removed from the region. After the Civil War, the region converted to a sharecropper/tenant farming system of agriculture. The introduction of railroads in 1869 opened the region to new markets, thus strengthening the economy and stimulating population growth. New communities were established along the railroad. The region's population was economically challenged in the 1930s by drought and the increased mechanization of farming. The area benefited from several of the New Deal programs. The economy did not recover until the construction of BGAD began in the 1940s. The construction project provided employment for the local population.

The local distribution of historic archaeological sites is less well documented than that for prehistoric sites. Information provided by historic maps of the region suggests that the location of the earliest historic occupations (c. 1780s) would coincide with the high probability areas

associated with prehistoric archaeological sites (Geo-Marine, Inc. 1996). In the later historic periods (1800–1900s), it is likely that historic archaeological site locations would focus less on water sources and more on roads, railroads, and proximity to industrial features (markets, saw mills, grist mills, warehouses, etc.) (Geo-Marine, Inc. 1996). Two factors affect the determination of local distributions of historic archaeological sites at BGAD. First, BGAD activities would have utilized existing transportation features, thus increasing the likelihood that disturbances affected historic archaeological sites. Second, only 1% of BGAD has been surveyed for archaeological sites, thus providing a relatively small sample on which to base historic archaeological site location distribution.

BGAD was originally built as Blue Grass Ordinance Depot in 1942 as part of the military buildup during World War II. The facility originally was a supply depot for ordinance and nonexplosive combat equipment. The function of the depot expanded to include storage of chemical warfare equipment in 1943. Between World War II and the Gulf War, the depot was expanded again to provide facilities for the renovation and demolition of ammunition and for the maintenance of guided missiles. The depot merged with the Lexington Signal Depot in 1964. The Lexington facility ended its supply and maintenance mission in 1992 and closed completely in 1994. The remaining Blue Grass facility was reorganized and named Blue Grass Army Depot in 1992.

#### **F.4.4 Summary of Archaeological Surveys and Resources**

Between 1983 and 1993, about 150 acres, or about 1% of BGAD's 14,600 acres (5,900 ha), was surveyed for archaeological resources. The surveys were conducted between 1983 and 1996 by Ball, Boedy, the COE, (Louisville District), and Waite and Ensor (Geo-Marine, Inc. 1996). No sites were recorded by Ball. The Boedy and COE surveys each identified one archaeological site. A 1993 survey by Waite and Ensor identified 37 archaeological sites. Of the total of 39 archaeological sites identified at BGAD, 25 are prehistoric, 10 are historic, and 6 are multicomponent (prehistoric/historic) sites. In addition, 17 historic and 11 prehistoric isolated finds have been identified. None of the sites identified at BGAD is currently listed on the NRHP. However, 16 prehistoric, 8 historic, and 5 multicomponent sites are listed as potentially eligible but requiring additional investigation (Geo-Marine, Inc. 1996). A total of 10 archaeological sites are considered ineligible for the NRHP, including 8 prehistoric sites, 1 historic site, and 1 multicomponent site.

The surveys conducted at BGAD have been primarily project-driven and thus focused on discreet areas. The majority of the facility remains to be surveyed. Prehistoric sites remaining on the facility could potentially relate to resource procurement, short- and long-term encampments, base camps, mounds, and additional isolated finds. Also, upland forested bluff crests and lower floodplains may possibly include villages (Geo-Marine, Inc. 1996).

Several archivally reported historic sites at BGAD have not been identified in the field. Three resources dating to the early 1780s, Banta Fort, Fort Estill, and Estill Station, have yet to

be field verified. The Civil War Battle of Richmond is reported to have taken place on BGAD property; however, the exact location of the battle has not been established, and a survey for archaeological evidence from the engagement is yet to be undertaken. At least nine historic sites also have been reported at BGAD but have not been officially recorded. In addition, 900 graves from various cemeteries within BGAD were moved off the depot in 1942 when construction of the base began (Geo-Marine, Inc. 1996). It is possible that some graves still remain intact on the facility. The majority of the historic archaeological sites potentially located at BGAD relate to agricultural production and processing and the raising and processing of livestock.

#### **F.4.5 Summary of Evaluations of Historic Structures**

BGAD has yet to conduct an architectural inventory of its 1,153 extant structures. Preliminary research into the built environment has identified 964 structures that pre-date 1946. Of this number, 904 are considered potentially eligible for listing on the NRHP. Additional research on the pre-1946 buildings is necessary for final determinations. The BGAD Cultural Resources Management Plan (Geo-Marine, Inc. 1996) indicates that many of the buildings in this potentially eligible class include numerous igloo storage buildings and safe houses and that full documentation of a single example of each would be sufficient for compliance. Most of the remaining 189 structures date to the Cold War era; no formal evaluations or recommendations have been developed for these buildings. However, initial examination suggests that 60 of the Cold War era buildings are likely to be ineligible for listing on the NRHP (Geo-Marine, Inc. 1996). The generation of an historic context and evaluations of standing structures are currently needed for BGAD.

#### **F.4.6 Summary of National Register of Historic Places Properties near BGAD**

More than 570 properties within 30 mi (50 km) of BGAD are listed on the NRHP (list available in Wescott 2001). All or portions of twenty counties in Kentucky fall within the 30-mi (50-km) radius — Madison, Bourbon, Boyle, Clark, Estill, Fayette, Garrard, Jackson, Jessamine, Laurel, Lee, Lincoln, Menifee, Mercer, Montgomery, Owsley, Powell, Rockcastle, Wolfe, and Woodford. The majority of the listed properties are in the cities of Richmond, Danville, Winchester, Lexington, Lancaster, Nicholasville, and Mount Sterling. The NRHP-listed properties include commercial (hotels, banks, stores, taverns, theaters, downtown historic districts), industrial (mills, gins, furnaces), residential (houses, farms, and districts), and institutional properties including military buildings (schools, churches, courthouses, post offices, armories) and other structures (monuments, memorials, railroad). Cemeteries, battlefields, and several archaeological sites (including mounds, petroglyphs, earthworks, village sites, etc.) within 30 mi (50 km) of BGAD are listed on the NRHP.

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**CONSULTATION LETTERS  
AND RESPONSES FOR ANAD**







**DEPARTMENT OF THE ARMY**  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 6, 2001

Directorate of Risk Management

Dr. Lee Warner, SHPO  
Alabama Historical Commission  
468 South Perry Street  
Montgomery, AL 36130-3477

Dear Dr. Warner:

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of a pilot facility for the destruction of chemical weapons at the Anniston Army Depot (ANAD) in Calhoun County, Alabama. As part of the decision-making process for this action, the Department of Defense (DOD) is preparing a National Environmental Policy Act (NEPA) document.

The DOD Assembled Chemical Weapons Assessment (ACWA) is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation. The ACWA will address pilot testing these technologies at one or more U.S. chemical stockpile locations – ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The enclosed map shows the location of the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the ACWA EIS and will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

This letter initiates consultations with your office regarding the proposed project. The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD and in 1997, your office concurred that the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. While further intensive survey may be required before your office concurs on a no adverse effect determination for this project, the chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair. The building is unlikely to be considered historically significant as it played no critical role in the early months of World War II; however, it was not included in an earlier study of World War II structures at ANAD (Hightower 1984). Please let us know if an evaluation of its historical significance will be required prior to its demolition.

The Army is also initiating consultations with points of contact (Tribal Historic Preservation Officers or designated representatives) from the following Native American Tribes, Bands, and Nations about the proposed project:

Alabama-Quassarte Tribal Town of the Creek Indian Nation of Oklahoma (Chief)  
Cherokee Nation of Oklahoma (Principal Chief)  
Eastern Band of the Cherokee Indians (Principal Chief)  
Kialegee Tribal Town of the Creek Nation of Oklahoma (Town King)  
Muskogee Creek Nation of Oklahoma (Principal Chief)  
Poarch Band of Creek Indians (Chairman)  
Thlopthlocco Tribal Town of the Creek Nation of Oklahoma (Town King)  
United Keetoowah Band of Cherokee (Spokesperson)

Please submit comments within the next 30 days. Your time and consideration are greatly appreciated.

If you have any questions please call Mr. Billy Burns at extension 256-235-4217.

Sincerely,



for David M. Parks  
Chief, Environmental Control  
and Engineering Division

Enclosure



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 13, 2001

Office of The Depot Commander

Mr. Bill S. Fife, Principal Chief  
Muskogee Creek Nation of Oklahoma  
P.O. Box 580  
Okmulgee, Oklahoma 74447

Dear Mr. Fife:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of an alternative technology pilot facility for the destruction of chemical weapons. As part of the decision-making process for this action, DOD is preparing a National Environmental Policy Act (NEPA) document.

The DOD ACWA is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation.

The attached map shows the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the EIS. They will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

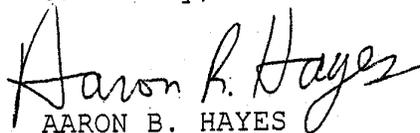
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, OD  
COMMANDING

Attachment



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 13, 2001

Office of The Depot Commander

Mr. Eddie Tullis, Chairman  
Poarch Band of Creek Indians  
HCR 69A, Box 85B  
Atmore, AL 63502

Dear Mr. Tullis:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of an alternative technology pilot facility for the destruction of chemical weapons. As part of the decision-making process for this action, DOD is preparing a National Environmental Policy Act (NEPA) document.

The DOD ACWA is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation.

The attached map shows the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the EIS. They will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

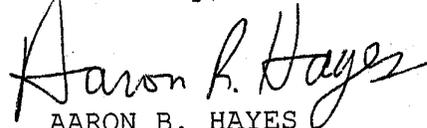
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, OD  
COMMANDING

Attachment



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 13, 2001

Office of The Depot Commander

Mr. Jonathan Taylor, Principal Chief  
Eastern Band of the Cherokee Indians  
P.O. Box 455  
Cherokee, North Carolina 28719

Dear Mr. Taylor:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

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The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

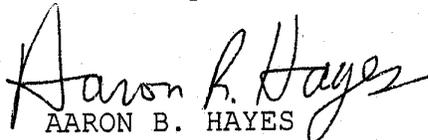
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, OD  
COMMANDING

Attachment



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 13, 2001

Office of The Depot Commander

Mr. Joe Byrd, Principal Chief  
Cherokee Nation of Oklahoma  
P.O. Box 948  
Tahlequah, Oklahoma 74465

Dear Mr. Byrd:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of an alternative technology pilot facility for the destruction of chemical weapons. As part of the decision-making process for this action, DOD is preparing a National Environmental Policy Act (NEPA) document.

The DOD ACWA is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation.

The attached map shows the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the EIS. They will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

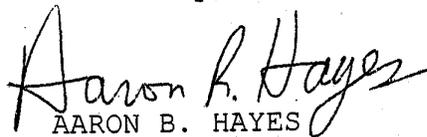
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, OD  
COMMANDING

Attachment



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 13, 2001

Office of The Depot Commander

Mr. John Ross, Spokesperson  
United Keetoowah Band of Cherokee  
P.O. Box 746  
Tahlequah, OK 74464

Dear Mr. Ross:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of an alternative technology pilot facility for the destruction of chemical weapons. As part of the decision-making process for this action, DOD is preparing a National Environmental Policy Act (NEPA) document.

The DOD ACWA is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation.

The attached map shows the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the EIS. They will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

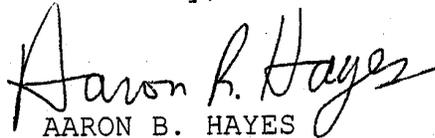
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, OD  
COMMANDING

Attachment



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 13, 2001

Office of The Depot Commander

Mr. Tarpie Yargee, Chief  
Alabama-Quassarte Tribal Town of the Creek Nation of Oklahoma  
P.O. Box 537  
Henryetta, OK 74437

Dear Mr. Yargee:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of an alternative technology pilot facility for the destruction of chemical weapons. As part of the decision-making process for this action, DOD is preparing a National Environmental Policy Act (NEPA) document.

The DOD ACWA is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation.

The attached map shows the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the EIS. They will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

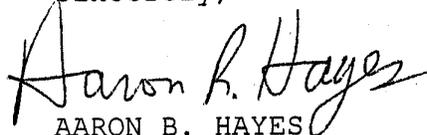
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, O.D.  
COMMANDING

Attachment



REPLY TO  
ATTENTION OF:

**DEPARTMENT OF THE ARMY**  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June , 2001

Office of The Depot Commander

Mr. Tony Martin, Town King  
Kialegee Tribal Town of the Creek Nation of Oklahoma  
318 Washita, P.O. Box 332  
Wetumka, OK 74883

Dear Mr. Martin:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of an alternative technology pilot facility for the destruction of chemical weapons. As part of the decision-making process for this action, DOD is preparing a National Environmental Policy Act (NEPA) document.

The DOD ACWA is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation.

The attached map shows the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the EIS. They will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

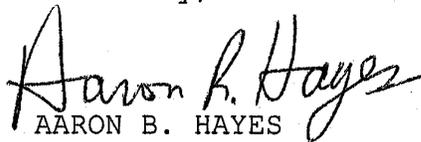
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, O.D.  
COMMANDING

Attachment



REPLY TO  
ATTENTION OF:

DEPARTMENT OF THE ARMY  
ANNISTON ARMY DEPOT  
7 FRANKFORD AVENUE  
ANNISTON, ALABAMA 36201-4199

June 13, 2001

Office of The Depot Commander

Mr. Grace Bunner, Town King  
Thlopthlocco Tribal Town of the Creek Nation of Oklahoma  
P.O. Box 706  
Okemah, Ok 74859

Dear Mr. Bunner:

The U.S. Department of the Army plans to begin destroying chemical munitions at Anniston Army Depot (ANAD), using incineration technology, in the spring of 2002. The Department of Defense (DOD) is also evaluating alternative methods for disposal of chemical munitions. The DOD Assembled Chemical Weapons Assessment (ACWA) will address pilot testing and evaluation of these alternatives to incineration at one or more U.S. chemical stockpile locations - ANAD (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of an alternative technology pilot facility for the destruction of chemical weapons. As part of the decision-making process for this action, DOD is preparing a National Environmental Policy Act (NEPA) document.

The DOD ACWA is preparing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration in the EIS are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation.

The attached map shows the alternative facility footprint locations under consideration for ANAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 16, 2000 in Anniston, Alabama.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the EIS. They will be evaluating potential impacts to cultural resources as part of their analysis. An archaeologist from ANL has researched available documents on archaeological surveys, historic building inventories, and Native American consultations for ANAD.

The probability of adverse effects on cultural resources as a result of the construction and operation of an ACWA facility appears small. The potential for archaeological sites is low in most areas of ANAD, and the necessary surveys of "all areas within ANAD considered suitable for archaeological survey" have been completed (USACE 1997). Each of the three proposed areas for ACWA (A, B, and C) is a considerable distance from the known archaeological sites, and each area has been at least partly subject to archeological survey. Part of Proposed Area B has undergone intensive survey for other proposed construction projects (USACE 1984, 1991). Part of Proposed Area A and all of Proposed Area C have been considered as part of less intensive surveys that focused on areas with archaeological potential (USACE 1997). Only the parts of Proposed Areas A and B that lie within the Chemical Limited Area, where the chemical munitions are stored, have not been surveyed, and the ground in these areas is at least partially disturbed. The locations of the potential utility and access road corridors follow existing rights-of-way; therefore, little impact to archaeological resources is expected in these cases. The chances of encountering additional significant archaeological resources in areas of proposed construction appear small. No ground disturbing activities take place during operation of an ACWA facility; therefore no impacts to cultural resources are expected after construction is completed.

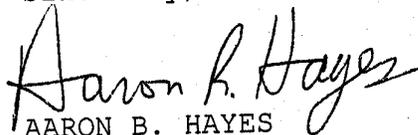
Only Proposed Area A contains an extant structure, Building 88, a former maintenance facility for chemical weapons that was constructed in 1944. The building is currently abandoned and in disrepair and is unlikely to be considered historically significant as it played no critical role in the early months of World War II.

The Army is initiating consultations about the proposed project with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Bands, Nations, and the Alabama Historical Commission.

We would appreciate receiving information on concerns or issues you may have regarding the proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility. Sensitive information will remain confidential as stipulated in 36 CFR Part 800.11. Please submit comments within 30 days. Your time and consideration are greatly appreciated.

In the meantime, if you have any questions or require further clarification regarding the project please call Mr. Billy Burns at phone 256-235-4217.

Sincerely,



AARON B. HAYES  
COLONEL, OD  
COMMANDING

Attachment



**CHEROKEE NATION**

P.O. Box 948  
Tahlequah, OK 74465-0948  
918-456-0671

Chad "Cornassel" Smith  
ᏆᏏᏏᏏ  
Principal Chief

Hastings Shade  
ᏆᏏᏏᏏ  
Deputy Principal Chief

June 26, 2001

Mr. Aaron B. Hayes  
Department of the Army  
Anniston Army Depot  
7 Frankfort Avenue  
Anniston, AL 36201-4199

Dear Mr. Hayes:

The Cherokee Nation has received your letter dated June 13 wherein you requested assistance with your site review pursuant to Section 106 of the National Historic Preservation Act as amended regarding the incineration of chemical munitions.

The Cherokee Nation is not presently aware of or able to identify any cultural resources affiliated with the Cherokee Nation within the proposed area of development. However, we are aware that inadvertent discovery may occur as a result of development, archaeological testing, or as project construction activities progress. Such activity has the potential to destroy, damage, or diminish the integrity of any Cherokee resources. Also, any such discovery may result in looting if not adequately protected. Therefore, the Cherokee Nation requests that:

1. In the event of inadvertent discovery of human remains, burial objects, or artifacts that all site surveys or other site activities cease pending notification of the Cherokee Nation;
2. Any and all remains, burial objects or artifacts must be properly secured and protected;
3. The Cherokee Nation opposes any laboratory testing, data retrieval, non-biodegradable shrouding, photographic documentation, public display, or unauthorized removal of ancestral remains or burial objects;
4. Sites known to possess or are discovered to possess ancestral remains or burial objects, or that have historical, cultural, or religious significance to the Cherokee people should be avoided.

There are three federally acknowledged Cherokee entities: the Cherokee Nation; the United Keetoowah Band of Cherokee Indians, and the Eastern Band of Cherokee Indians. Section 106 mandates tribal commentary, review or consultation with federally recognized tribal entities. Therefore, any consultation, commentary or review addressed to state recognized groups, entities, or self-identified individuals purporting to be American Indian representatives does not constitute valid tribal consultation in accordance with the authority and intent of federal legislation.

Should you desire to communicate with the designated tribal representative, you may contact me at (918) 456-0671, extension 2466.

Sincerely,

Dr. Richard Allen  
NAGPRA Representative



**CONSULTATION LETTERS  
AND RESPONSES FOR PBA**







REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
PINE BLUFF ARSENAL  
PINE BLUFF, ARKANSAS 71602-9500

September 14, 2001

Office of the Commander

Ms. Cathie Matthews  
Arkansas State Historic Officer  
1500 Tower Building, 323 Center Street  
Little Rock, AR 72201

Dear Ms. Matthews:

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of a pilot facility to demonstrate alternative technologies for the destruction of chemical weapons at the Pine Bluff Arsenal in Jefferson County, Arkansas. The two enclosed maps provide the location of the arsenal and alternative facility footprint locations under consideration. This letter initiates consultations with your office regarding the project.

As part of the decision-making process for this action, the Department of Defense is developing a National Environmental Policy Act document. The Department of Defense Assembled Chemical Weapons Assessment is preparing an Environmental Impact Statement to address the potential impacts of constructing and operating a full-scale pilot facility for the testing of two or more technologies for the destruction of the U.S. chemical stockpiles. Chemical stockpile locations include Anniston Army Depot (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR) and Pueblo Chemical Depot (CO).

On April 14, 2000, the Assembled Chemical Weapons Assessment issued a Notice of Intent to prepare an Environmental Impact Statement for its action (Federal Register Vol. 65, No. 73, page 20139). A public scoping meeting for the statement was held on May 10, 2000 in Pine Bluff, Arkansas.

Argonne National Laboratory is assisting in preparing the Environmental Impact Statement and will evaluate potential impacts to cultural resources as part of their analysis. An archaeologist from Argonne National Laboratory has researched available documents from Pine Bluff Arsenal on archaeological surveys, historic building inventories, and Native American consultations.

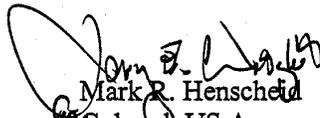
-2-

No archaeological resources or historic structures were identified in the potential construction locations for the Assembled Chemical Weapons Assessment pilot test facility (Areas A, B, and C). The locations of the potential utility and access road corridors follow existing rights-of way; therefore, no ground disturbing activities will take place during operation of the facility. No standing structures are located in the areas of proposed construction.

We would appreciate any comments regarding cultural resources or other concerns you may have regarding the proposed project. Please submit comments to Ms. Libby Fowler, Cultural Resources Manager for Pine Bluff Arsenal, within the next 30 days.

If you need further technical clarifications regarding the pilot facility project, please call Ms. Sharon Harris, Environmental Coordinator for Pine Bluff Chemical Activity, at (870) 540-3958.

Sincerely,



Mark R. Henschel  
Colonel, US Army  
Commanding

Enclosure ..

**CONSULTATION LETTERS  
AND RESPONSES FOR PCD**



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

March 21, 2001

Environmental Management Division

SUBJECT: NEPA Documents

Ms. Georgianna Contiguglia, SHPO  
Colorado Historical Society  
Office of Archaeology and Historic Preservation  
1300 Broadway  
Denver, CO 80203

Dear Ms. Contiguglia:

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of a chemical weapons disposal facility at the Pueblo Chemical Depot (PCD) in Pueblo County, Colorado. As part of the decision-making process for this action, two parallel National Environmental Policy Act (NEPA) documents are being prepared by two Army programs to address distinct but related actions.

- (1) The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (AL), Blue Grass Army Depot (KY), Pine Bluff Arsenal (AR), and PCD (CO).
- (2) The Army Program Manager for Chemical Demilitarization (PMCD) is developing a site-specific EIS to address the impacts of constructing and operating a facility to completely dispose of the chemical munitions stockpile at PCD. The CSDP EIS will assess and compare the impacts of two incineration technologies as well as the two neutralization technologies identified by the ACWA program.

The enclosed maps show the location of PCD and the alternative facility footprint locations at PCD, identified as blocks A, B, and C respectively. Corridors 1 through 4 are the potential areas being considered for the natural gas lines and communications lines. On April 14, 2000, ACWA and PMCD issued Notices of Intent to prepare EISs for their respective actions (*Federal Register* Vol. 65, No. 73, pages 20139-20140). Combined public scoping meetings for both EISs were held on May 9, 2000, in Pueblo, Colorado.

The Army is also requesting comments from points of contact (Tribal Historic Preservation Officers or designated representatives) from the following Native American Tribes/Councils about the proposed projects:

Colorado Commission of Indian Affairs,  
Jicarilla Apache Tribe,  
Apache Tribe of Oklahoma,  
Medicine Wheel Coalition for Sacred Sites of North America,  
Arapahoe Business Council,  
Northern Cheyenne Tribal Council,  
Northern Cheyenne Tribe,  
Cheyenne-Arapahoe Tribes of Oklahoma,  
Comanche Tribal Business Committee,  
Comanche Tribe of Oklahoma,  
Kiowa Tribe of Oklahoma,  
Oglala Sioux Tribe,  
Rosebud Sioux Tribe,  
Shoshone Business Council,  
Southern Ute Tribal Council,  
Southern Ute Language and Cultural Committee, and  
Ute Mountain Ute Tribal Council

We would appreciate receiving information on concerns or issues you may have regarding either proposed project. Please submit comments to the points of contact identified below within the next 30 days. Your time and consideration are greatly appreciated.

Please contact Mr. Brad Still, PCD, at (719)549-4883, or email him at [stilljb@pcd-emh1.pcd.army.mil](mailto:stilljb@pcd-emh1.pcd.army.mil), or Mr. Jon Ware, PMACWA, at (410)436-2210, or email him at [jon.ware@SBCCOM.APGEA.ARMY.MIL](mailto:jon.ware@SBCCOM.APGEA.ARMY.MIL), or Ms. Penny Robitalle, PMCD, at (410)436-4178, or email her at [penny.robitalle@pmcd.apgea.army.mil](mailto:penny.robitalle@pmcd.apgea.army.mil) with any questions.

Sincerely,



Kathryn R. Cain  
Chief, Environmental Management Division

Enclosures

**Copy Furnished:**

✓ Mr. Jon Ware, ACWA-WA, Environmental Team Leader, ATTN: AMSSB-PM-ACWA, Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD 2101-5424  
Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005  
Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo, CO 81006-9330



REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2644

Ms. Karen Wilde-Rogers  
Executive Secretary  
Colorado Commission of Indian Affairs  
130 State Capitol  
Denver, Colorado 80203

Dear Ms. Wilde-Rogers:

The United States Department of the Army has published two Draft Environmental Impact Statements that assess the potential impacts of the design, construction, operation, and closure of a chemical weapons disposal facility at Pueblo Chemical Depot, Colorado, as follows:

a. The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic Environmental Impact Statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (Alabama), Blue Grass Army Depot (Kentucky), Pine Bluff Arsenal (Arizona), and Pueblo Chemical Depot (Colorado).

b. The Army Program Manager for Chemical Demilitarization (PMCD) is developing a site-specific EIS to address the impacts of constructing and operating an incineration facility to completely dispose of the chemical munitions stockpile at Pueblo Chemical Depot. The PMCD EIS will assess and compare the impacts of two incineration technologies as well as the two neutralization technologies identified by the ACWA program.

The Pueblo Chemical Depot is one of eight sites in the continental United States where chemical agents are currently stored. In response to a Congressional mandate to destroy the nation's stockpile of chemical warfare agents and munitions (Title 14, Part B, Section 1412 of Public Law 99-145, as amended in Public Laws 100-456, and 102-190), chemical agent and munitions stored at Pueblo Chemical Depot must be destroyed. The demilitarization of the agent and munitions via incineration and available alternative technologies will be evaluated to assess the potential site-specific health and environmental impacts.

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- June 7, 2001 – Avondale Elementary School, 11:30 a.m. to 3:00 p.m., and 6:00 p.m. to 9:00 p.m.

Comments received will be addressed in the Final Environmental Impact Statements. Your comments on these two studies will be factored into the Department of Defense's disposal technology selection process for Pueblo.

Electronic copies of the two Draft Environmental Impact Statements are enclosed for your convenience. We welcome your comments. Comments may be sent by mail, fax, or e-mail to the following:

- PMACWA study: Mr. Jon Ware, Program Manager for Assembled Chemical Weapons Assessment EIS, 9700 South Cass Avenue., P.O. Box 8369, Argonne, IL 60439-4871. You may also fax comments to 1-630-252-4611 or e-mail them to [acwacomment@anl.gov](mailto:acwacomment@anl.gov).
- PMCD study: Mr. Greg Mahall, Program Manager for Chemical Demilitarization EIS, Building. 4585 Parrish Road., Aberdeen Proving Ground (EA), MD 21010-4005. You may also fax comments to 410-436-5122 or e-mail them to [gregory.mahall@pmcd.apgea.army.mil](mailto:gregory.mahall@pmcd.apgea.army.mil).

If you have any questions you may contact the above listed representatives or Mr. Brad Still of my staff at (719) 549-4883, or email him at [stilljb@pcd-emh1.pcd.army.mil](mailto:stilljb@pcd-emh1.pcd.army.mil).

Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

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✓ Mr. Jon Ware, ACWA, Environmental Team Leader, ATTN: AMSSB-PM-ACWA, Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD 2101-5424

Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005  
Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo,

REPLY TO  
ATTENTION OFDEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2637

Mr. Ernest House  
Chairman, Ute Mountain Ute Tribe  
General Delivery  
Towoac, Colorado 81334

Dear Mr. House:

The United States Department of the Army has published two Draft Environmental Impact Statements that assess the potential impacts of the design, construction, operation, and closure of a chemical weapons disposal facility at Pueblo Chemical Depot, Colorado, as follows:

a. The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic Environmental Impact Statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (Alabama), Blue Grass Army Depot (Kentucky), Pine Bluff Arsenal (Arizona), and Pueblo Chemical Depot (Colorado).

b. The Army Program Manager for Chemical Demilitarization (PMCD) is developing a site-specific EIS to address the impacts of constructing and operating an incineration facility to completely dispose of the chemical munitions stockpile at Pueblo Chemical Depot. The PMCD EIS will assess and compare the impacts of two incineration technologies as well as the two neutralization technologies identified by the ACWA program.

The Pueblo Chemical Depot is one of eight sites in the continental United States where chemical agents are currently stored. In response to a Congressional mandate to destroy the nation's stockpile of chemical warfare agents and munitions (Title 14, Part B, Section 1412 of Public Law 99-145, as amended in Public Laws 100-456, and 102-190), chemical agent and munitions stored at Pueblo Chemical Depot must be destroyed. The demilitarization of the agent and munitions via incineration and available alternative technologies will be evaluated to assess the potential site-specific health and environmental impacts.

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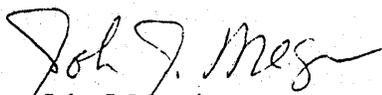
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- PMACWA study: Mr. Jon Ware, Program Manager for Assembled Chemical Weapons Assessment EIS, 9700 South Cass Avenue., P.O. Box 8369, Argonne, IL 60439-4871. You may also fax comments to 1-630-252-4611 or e-mail them to [acwacomment@anl.gov](mailto:acwacomment@anl.gov).
- PMCD study: Mr. Greg Mahall, Program Manager for Chemical Demilitarization EIS, Building. 4585 Parrish Road., Aberdeen Proving Ground (EA), MD 21010-4005. You may also fax comments to 410-436-5122 or e-mail them to [gregory.mahall@pmcd.apgea.army.mil](mailto:gregory.mahall@pmcd.apgea.army.mil).

If you have any questions you may contact the above listed representatives or Mr. Brad Still of my staff at (719) 549-4883, or email him at [stilljb@pcd-emh1.pcd.army.mil](mailto:stilljb@pcd-emh1.pcd.army.mil).

Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

Copy Furnished:

- ✓ Mr. Jon Ware, ACWA, Environmental Team Leader, ATTN: AMSSB-PM-ACWA, Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD 2101-5424
- Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005
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REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2620

Ms. Vida Peabody  
Acting Chairwoman  
Southern Ute Indian Tribe  
Post Office Box 737  
Ignacio, Colorado 81137

Dear Ms. Peabody:

The United States Department of the Army has published two Draft Environmental Impact Statements that assess the potential impacts of the design, construction, operation, and closure of a chemical weapons disposal facility at Pueblo Chemical Depot, Colorado, as follows:

a. The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic Environmental Impact Statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (Alabama), Blue Grass Army Depot (Kentucky), Pine Bluff Arsenal (Arizona), and Pueblo Chemical Depot (Colorado).

b. The Army Program Manager for Chemical Demilitarization (PMCD) is developing a site-specific EIS to address the impacts of constructing and operating an incineration facility to completely dispose of the chemical munitions stockpile at Pueblo Chemical Depot. The PMCD EIS will assess and compare the impacts of two incineration technologies as well as the two neutralization technologies identified by the ACWA program.

The Pueblo Chemical Depot is one of eight sites in the continental United States where chemical agents are currently stored. In response to a Congressional mandate to destroy the nation's stockpile of chemical warfare agents and munitions (Title 14, Part B, Section 1412 of Public Law 99-145, as amended in Public Laws 100-456, and 102-190), chemical agent and munitions stored at Pueblo Chemical Depot must be destroyed. The demilitarization of the agent and munitions via incineration and available alternative technologies will be evaluated to assess the potential site-specific health and environmental impacts.

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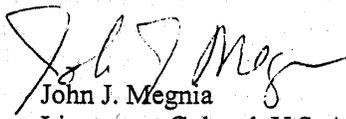
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If you have any questions you may contact the above listed representatives or Mr. Brad Still of my staff at (719) 549-4883, or email him at [stilljb@pcd-emh1.pcd.army.mil](mailto:stilljb@pcd-emh1.pcd.army.mil).

Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

Copy Furnished:

- ✓ Mr. Jon Ware, ACWA, Environmental Team Leader, ATTN: AMSSB-PM-ACWA, Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD 2101-5424
- Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005
- Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo,

REPLY TO  
ATTENTION OF

DEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2613

Ms. Geri Small  
Chairwoman, Northern Cheyenne Tribe  
Post Office Box 128  
Lame Deer, Montana 59043

Dear Ms. Small:

The United States Department of the Army has published two Draft Environmental Impact Statements that assess the potential impacts of the design, construction, operation, and closure of a chemical weapons disposal facility at Pueblo Chemical Depot, Colorado, as follows:

a. The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic Environmental Impact Statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (Alabama), Blue Grass Army Depot (Kentucky), Pine Bluff Arsenal (Arizona), and Pueblo Chemical Depot (Colorado).

b. The Army Program Manager for Chemical Demilitarization (PMCD) is developing a site-specific EIS to address the impacts of constructing and operating an incineration facility to completely dispose of the chemical munitions stockpile at Pueblo Chemical Depot. The PMCD EIS will assess and compare the impacts of two incineration technologies as well as the two neutralization technologies identified by the ACWA program.

The Pueblo Chemical Depot is one of eight sites in the continental United States where chemical agents are currently stored. In response to a Congressional mandate to destroy the nation's stockpile of chemical warfare agents and munitions (Title 14, Part B, Section 1412 of Public Law 99-145, as amended in Public Laws 100-456, and 102-190), chemical agent and munitions stored at Pueblo Chemical Depot must be destroyed. The demilitarization of the agent and munitions via incineration and available alternative technologies will be evaluated to assess the potential site-specific health and environmental impacts.

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Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

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Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005  
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May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2606

Mr. Anthony A. Addison, Sr.  
Chairman, Northern Arapaho Tribe  
Post Office Box 396  
Fort Washakie, Wyoming 82514

Dear Mr. Addison:

The United States Department of the Army has published two Draft Environmental Impact Statements that assess the potential impacts of the design, construction, operation, and closure of a chemical weapons disposal facility at Pueblo Chemical Depot, Colorado, as follows:

a. The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic Environmental Impact Statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (Alabama), Blue Grass Army Depot (Kentucky), Pine Bluff Arsenal (Arizona), and Pueblo Chemical Depot (Colorado).

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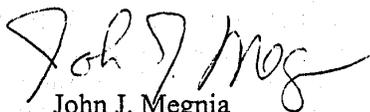
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Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

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Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD  
2101-5424

Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of  
Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005  
Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo,

REPLY TO  
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PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2590

Ms. Sara Misquez  
President, Mescalero Apache Tribe  
Post Office Box 227  
Mescalero, New Mexico 88340

Dear Ms Misquez:

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a. The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic Environmental Impact Statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (Alabama), Blue Grass Army Depot (Kentucky), Pine Bluff Arsenal (Arizona), and Pueblo Chemical Depot (Colorado).

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The Pueblo Chemical Depot is one of eight sites in the continental United States where chemical agents are currently stored. In response to a Congressional mandate to destroy the nation's stockpile of chemical warfare agents and munitions (Title 14, Part B, Section 1412 of Public Law 99-145, as amended in Public Laws 100-456, and 102-190), chemical agent and munitions stored at Pueblo Chemical Depot must be destroyed. The demilitarization of the agent and munitions via incineration and available alternative technologies will be evaluated to assess the potential site-specific health and environmental impacts.

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Sincerely,

  
John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

Copy Furnished:

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Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD  
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Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of  
Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005  
Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo,

REPLY TO  
ATTENTION OFDEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2583

Mr. Billy Evans Horse  
Chairman, Kiowa Tribe of Oklahoma  
Post Office Box 369  
Carnegie, Oklahoma 73015

Dear Mr. Horse:

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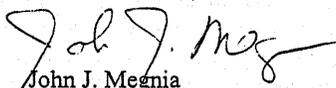
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Sincerely,

  
John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

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REPLY TO  
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45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2576

Ms. Claudia J. Vigil Muniz  
President, Jicarilla Apache Tribe  
Post Office Box 507  
Dulce, New Mexico 87528

Dear Ms. Vigil Muniz:

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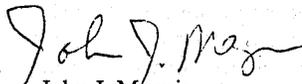
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Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
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May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2569

Ms. Ruey Darrow  
Chairwoman, Fort Sill Apache Tribe  
Route 2, Box 121  
Apache, Oklahoma 73006

Dear Ms. Darrow:

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Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
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Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2552

Mr. Johnny Wauqua  
Chairman, Commanche Tribe of Oklahoma  
Post Office Box 908  
Lawton, Oklahoma 73502

Dear Mr. Wauqua:

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CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2545

Mr. Gregg Bourland  
Chairman, Cheyenne River Lakota Tribe  
Eagle Butte, South Dakota 57625

Dear Mr. Bourland:

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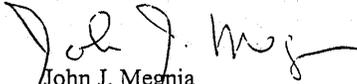
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May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2538

Mr. James Pedro  
Chairman, Cheyenne and Arapahoe Tribes of Oklahoma  
Post Office Box 38  
Concho, Oklahoma 73022

Dear Mr. Pedro:

The United States Department of the Army has published two Draft Environmental Impact Statements that assess the potential impacts of the design, construction, operation, and closure of a chemical weapons disposal facility at Pueblo Chemical Depot, Colorado, as follows:

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b. The Army Program Manager for Chemical Demilitarization (PMCD) is developing a site-specific EIS to address the impacts of constructing and operating an incineration facility to completely dispose of the chemical munitions stockpile at Pueblo Chemical Depot. The PMCD EIS will assess and compare the impacts of two incineration technologies as well as the two neutralization technologies identified by the ACWA program.

The Pueblo Chemical Depot is one of eight sites in the continental United States where chemical agents are currently stored. In response to a Congressional mandate to destroy the nation's stockpile of chemical warfare agents and munitions (Title 14, Part B, Section 1412 of Public Law 99-145, as amended in Public Laws 100-456, and 102-190), chemical agent and munitions stored at Pueblo Chemical Depot must be destroyed. The demilitarization of the agent and munitions via incineration and available alternative technologies will be evaluated to assess the potential site-specific health and environmental impacts.

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Notice of Availability, will end on June 25, 2001. Public availability sessions will be held as follows:

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- June 7, 2001 – Avondale Elementary School, 11:30 a.m. to 3:00 p.m., and 6:00 p.m. to 9:00 p.m.

Comments received will be addressed in the Final Environmental Impact Statements. Your comments on these two studies will be factored into the Department of Defense's disposal technology selection process for Pueblo.

Electronic copies of the two Draft Environmental Impact Statements are enclosed for your convenience. We welcome your comments. Comments may be sent by mail, fax, or e-mail to the following:

- PMACWA study: Mr. Jon Ware, Program Manager for Assembled Chemical Weapons Assessment EIS, 9700 South Cass Avenue., P.O. Box 8369, Argonne, IL 60439-4871. You may also fax comments to 1-630-252-4611 or e-mail them to [acwacomment@anl.gov](mailto:acwacomment@anl.gov).
- PMCD study: Mr. Greg Mahall, Program Manager for Chemical Demilitarization EIS, Building. 4585 Parrish Road., Aberdeen Proving Ground (EA), MD 21010-4005. You may also fax comments to 410-436-5122 or e-mail them to [gregory.mahall@pmcd.apgea.army.mil](mailto:gregory.mahall@pmcd.apgea.army.mil).

If you have any questions you may contact the above listed representatives or Mr. Brad Still of my staff at (719) 549-4883, or email him at [stilljb@pcd-emh1.pcd.army.mil](mailto:stilljb@pcd-emh1.pcd.army.mil).

Sincerely,

  
John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

Copy Furnished:

- ✓ Mr. Jon Ware, ACWA, Environmental Team Leader, ATTN: AMSSB-PM-ACWA, Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD 2101-5424
- Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005
- Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo,

REPLY TO  
ATTENTION OFDEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 23, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2521

Mr. Gene Maroquin  
Chairman, Apache Tribe of Oklahoma  
Post Office Box 1220  
Anadarko, Oklahoma 73005

Dear Mr. Maroquin:

The United States Department of the Army has published two Draft Environmental Impact Statements that assess the potential impacts of the design, construction, operation, and closure of a chemical weapons disposal facility at Pueblo Chemical Depot, Colorado, as follows:

a. The Army Program Manager for Assembled Chemical Weapons Assessment (PMACWA) is developing a programmatic Environmental Impact Statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapons stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation and (2) neutralization followed by biodegradation. Additional technologies are currently being evaluated and may also be addressed in the programmatic EIS. The PMACWA EIS will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (Alabama), Blue Grass Army Depot (Kentucky), Pine Bluff Arsenal (Arizona), and Pueblo Chemical Depot (Colorado).

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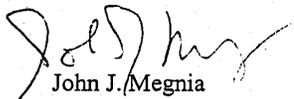
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If you have any questions you may contact the above listed representatives or Mr. Brad Still of my staff at (719) 549-4883, or email him at [stilljb@pcd-emh1.pcd.army.mil](mailto:stilljb@pcd-emh1.pcd.army.mil).

Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

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- ✓ Mr. Jon Ware, ACWA, Environmental Team Leader, ATTN: AMSSB-PM-ACWA, Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD 2101-5424
- Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005
- Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo,

REPLY TO  
ATTENTION OFDEPARTMENT OF THE ARMY  
PUEBLO CHEMICAL DEPOT  
45825 HIGHWAY 96 EAST  
PUEBLO, COLORADO 81006-9330

May 24, 2001

Office of the Commander

CERTIFIED MAIL -RETURN RECEIPT REQUESTED

7099 3220 0005 0607 2514

Mr. Leonard Atole  
Jicarilla Apache Tribe  
Post Office Box 507  
Dulce, New Mexico 87528

Dear Mr. Atole:

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If you have any questions you may contact the above listed representatives or Mr. Brad Still of my staff at (719) 549-4883, or email him at [stilljb@pcd-emh1.pcd.army.mil](mailto:stilljb@pcd-emh1.pcd.army.mil).

Sincerely,



John J. Megnia  
Lieutenant Colonel, U.S. Army  
Commanding

Enclosures

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Building E5101, Room 101, 5183 Blackhawk Road, Aberdeen Proving Ground, MD  
2101-5424

Ms. Penny Robitalle, Program Manager for Chemical Demilitarization, Corner of  
Hoadley and Parrish Roads, Aberdeen Proving Ground, MD 21010-4005  
Document Tracking Center, Pueblo Chemical Depot, 45825 Highway 96 East, Pueblo,

filed 5-14-01

**COLORADO  
HISTORICAL  
SOCIETY**

The Colorado History Museum 1300 Broadway Denver, Colorado 80203-2137

May 4, 2001

Kathryn R. Cain  
Chief, Environmental Management Division  
Department of the Army  
Pueblo Chemical Depot  
45825 Highway 96 East  
Pueblo, CO 81006-9330

RE: Chemical Weapons Disposal Facility

Dear Ms. Cain:

Thank you for your correspondence dated March 21, 2001, concerning the above project. We regret the delay in our response.

A search of the Colorado Inventory of Cultural Resources indicated that Igloo Block G (SPE2158), which has been determined eligible for inclusion in the National Register of Historic Places appears to be located within the area of potential effects of the proposed alternative facility footprints. In addition, the following National Register eligible districts are adjacent to the proposed utility lines: Administration and Officers Quarters Historic District (SPE2154), Warehouse District (SPE2155), Standard Magazine Area Historic District (SPE2156) and Block J Historic District (SPE2159).

Archival documentation of the above resources has been accomplished pursuant to a Programmatic Agreement entitled *Utilization and Eventual Disposal of Above Ground Facilities at Pueblo Chemical Depot, Colorado*. However, we encourage the Army to avoid affecting the qualities of significance of these historic properties, if possible. Finally, if subsurface archaeological resources are encountered during ground disturbing activities, it will be necessary to halt the work until such resources can be evaluated in consultation with our office.

If we may be of further assistance, please contact Kaaren Hardy, our Intergovernmental Services Director, at 303/866-3398.

Sincerely,

For  
Georgianna Contiguglia  
State Historic Preservation Officer

---

"Embracing Our Future through Our Intriguing Past"  
*Archaeology and Historic Preservation Month - May 2001*

OFFICE OF ARCHAEOLOGY AND HISTORIC PRESERVATION  
303-866-3392 • Fax 303-866-2711 • E-mail: [oaahp@ohs.state.co.us](mailto:oaahp@ohs.state.co.us) • Internet: <http://www.coloradohistory-oahp.org>



**CONSULTATION LETTERS  
AND RESPONSES FOR BGAD**







Reply to  
Attention of

**DEPARTMENT OF THE ARMY**  
BLUE GRASS ARMY DEPOT  
2091 KINGSTON HIGHWAY  
RICHMOND, KENTUCKY  
40475-5060

May 7, 2001

Environmental Office

Mr. David L. Morgan, State Historic Preservation Officer  
Kentucky Heritage Council  
300 Washington Street  
Frankfort, KY 40601

RE: Notification of an Environmental Impact Statement at the Blue Grass Army Depot  
in Madison County, Kentucky

Dear Mr. Morgan:

The U.S. Department of the Army is evaluating the potential impacts associated with the design, construction, and operation of a chemical munitions disposal facility at the Blue Grass Army Depot (BGAD) in Madison County, Kentucky. As part of the decision-making process for this action, two parallel National Environmental Policy Act (NEPA) documents are being prepared by two Department of Defense (DOD) programs to address distinct but related actions.

- (1) The DOD Assembled Chemical Weapons Assessment (ACWA) is developing an environmental impact statement (EIS) to address the potential impacts of constructing and operating a full-scale pilot facility for testing two or more technologies that are alternatives to incineration for the destruction of the U.S. chemical weapon stockpile. The technologies currently under consideration are (1) neutralization followed by supercritical water oxidation (SCWO); (2) neutralization followed by biodegradation; (3) neutralization followed by SCWO and gas-phase chemical reduction; and (4) electrochemical oxidation. The ACWA will address pilot testing these technologies at one or more U.S. chemical stockpile locations – Anniston Army Depot (AL), BGAD (KY), Pine Bluff Arsenal (AR), and Pueblo Chemical Depot (CO).
- (2) The U.S. Army Program Manager Chemical Demilitarization (PMCD) is developing a site-specific EIS to address the impacts of constructing and operating a facility to dispose of the chemical munitions stockpile at BGAD. The PMCD EIS will assess and compare the impacts of incineration technologies as well as the four alternative technologies identified by the ACWA program.

-2-

The enclosed maps show the location of BGAD and the alternative facility footprint locations at BGAD. On April 14, 2000, ACWA issued a Notice of Intent to prepare an EIS for its action (*Federal Register* Vol. 65, No. 73, page 20139). A public scoping meeting for the ACWA EIS was held on May 18, 2000 in Richmond, Kentucky. PMCD issued its Notice of Intent on Dec. 4, 2000 (*Federal Register* Vol. 65, No. 233, page 75677); the public scoping meeting for the PMCD EIS was held in Richmond, Kentucky on January 9, 2001.

Argonne National Laboratory (ANL) is assisting ACWA in preparing the ACWA EIS and will be evaluating potential impacts to cultural resources as part of their analysis. Oak Ridge National Laboratory (ORNL) is assisting with the site-specific EIS for BGAD. For the ACWA EIS, an archaeologist from ANL has researched available survey documents for BGAD. ORNL will use the information compiled by ANL for the site-specific EIS.

Currently, the proposed areas for the facility have not been completely surveyed for archaeological sites. No sites were recorded during a 1983 survey of the southern part of Area A, but the southern part of Area B has been identified in the BGAD Cultural Resources Management Plan (prepared by Geo-Marine, Inc. in 1996) as an area with a high potential for containing archaeological sites. It therefore appears that construction has the potential to affect cultural resources, but whether the effect will be adverse will depend on the project site and results of any required survey.

The Army is initiating consultations about the proposed projects with points of contact (Tribal Historic Preservation Officers or designated representatives) from the Native American Tribes, Councils, and Nations listed below, as well as with the Kentucky Heritage Council.

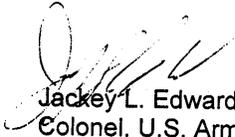
Absentee-Shawnee Tribe of Oklahoma (Chairperson and NAGPRA Contact)  
Eastern Shawnee Tribe of Oklahoma (Chief)  
Eastern Band of Cherokee Indians (Principal Chief and NAGPRA Contact)  
Cherokee Nation of Oklahoma (Principal Chief and NAGPRA Contact)  
United Keetoowah Band of Cherokee (Chief and NAGPRA Contact)  
Chickasaw Nation of Oklahoma (Governor and NAGPRA Contact)  
Georgia Tribe of Eastern Cherokee (NAGPRA Contact)

We would appreciate receiving information on concerns or issues you may have regarding either proposed project. We are especially interested in your assistance in identifying properties of known religious or cultural significance that may be affected by the construction and operation of the proposed facility(ies). Sensitive information will remain confidential as stipulated under 36 CFR Part 800.11. Please submit comments to Joe Elliott at the return address within 30 days. Your time and consideration are greatly appreciated.

-3-

In the meantime, if you have any questions or require further clarification regarding either project please contact Joe Elliott at (859) 625-6021 or [elliott.joe@bluegrass.army.mil](mailto:elliott.joe@bluegrass.army.mil).

Sincerely,



Jackey L. Edwards  
Colonel, U.S. Army  
Commanding Officer

Enclosures

