

## DEPARTMENT OF THE ARMY

FORT WORTH DISTRICT, CORPS OF ENGINEERS P. O. BOX 17300 FORT WORTH, TEXAS 76102-0300

June 23, 2011

Planning, Environmental and Regulatory Division

Ms. Jan V. Biella New Mexico State Historic Preservation Officer Department of Cultural Affairs, Historic Preservation Division Bataan Memorial Building 407 Galisteo Street, Suite 236 Santa Fe, New Mexico 87501

Dear Ms. Biella:

The United States Army (Army) installation at Fort Wingate, New Mexico was closed under the provisions of the Defense Base Closure and Realignment Act of 1988 (BRAC) and the Army is proceeding with the BRAC environmental cleanup prior to the eventual transfer to other federal agencies. Transfer to another federal agency is not considered an undertaking under Section 106 of the National Historic Preservation Act. However, prior to transfer, environmental clean-up actions by the Army have the potential to affect historic properties.

The Advisory Council on Historic Preservation (ACHP) has issued Program Comments on World War II and Cold War Era Ammunition Storage Facilities and Army Ammunition Production Facilities and Plants. The National Council of State Historic Preservation Officers entered into an agreement with the Army in 1986 that addresses World War II temporary structures. These comments and agreements address the majority of the buildings and structures on the installation with the exception of the administration area. More information is included on the enclosed compact disk.

Currently, three structures are known to be affected by environmental actions that are not addressed by the ACHP Program Comments. Structure 53 (Water Tower) and associated Structure 46 (Water Tank), just outside the administration area, have remained unused for decades and do not meet current New Mexico Environmental quality standards, Occupational Safety and Health Administration (OSHA) standards for access and the Federal Aviation Administration (FAA) has determined the Water Tower poses a significant hazard to aircraft due to the lack of adequate lighting.

There are three possible options:

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- **a. Preserve**. Preserve the Water Tower and Water Tank in place and comply with FAA regulations. To comply with the regulation to place safety lights on top, the undertaking requires removal of lead based paint (\$375K), prepare and repaint the structures (\$150K) and the replacement of access ladders and associated railings (100K) for maintenance. The structure would still not meet New Mexico water quality standards and would remain unusable. Total cost: \$625K.
- b. Rehabilitate. Rehabilitate the Water Tower and restore to a working condition. This would require the same costs as option a., plus repair and relining the interior to meet New Mexico standards and the replacement of associated water lines into the administration area. The cost would be around one million dollars. However, BRAC prohibits improvements to BRAC property. Therefore, this is not a viable option.
- c. Demolition. Demolish and salvage the structure in accordance with applicable laws and regulations. Cost: \$300K.

Of the two available options, preservation is over twice the cost of demolition. The Water Tower and Water Tank would still not be close to an operational state. In terms of historic significance, the Water Tower and Water Tank are ancillary support structures of the installation and their loss only presents a minor impact on the installation's ability to convey its significance. The high cost of preservation efforts versus demolition has led the Army to decide to demolish the structures under on-going BRAC environmental remediation efforts. In an era of national recession and upcoming federal budget cuts, the Army concludes this is the only fiscally responsible choice for the American taxpayer.

Due to extensive soil contamination under Structure 6 (Gas Station), the environmental restoration of the installation will require removal of the structure under on-going BRAC environmental remediation. With the contamination extending to the depth of over 20 feet, there is no other viable option to demolition.

The demolition of these three structures constitutes an undertaking under Section 106 of the National Historic Preservation Act. The three structures are eligible for listing on the National Register of Historic Places for their association with Fort Wingate, New Mexico under Criterion A from its inception in 1939 until the last major structures were constructed on the installation in 1961. Fort Wingate was a premier World War II Ammunition Depot and as part of the installation's infrastructure, they are significant in terms of setting, feeling and association. More information regarding the installation's history, previous surveys, New Mexico State Inventory Forms, etc are included on the enclosed compact disk.

The Area of Potential Effect (APE) of the undertaking consists of the immediate area around the subject structures. No known archeological sites are within the APE as these areas were highly disturbed during their construction (reference archeological documents on the enclosed compact disk). The Army has determined the undertaking shall have an adverse effect on the three subject historic properties.

In a separate letter, the Army is notifying the ACHP of the undertaking's adverse effect on historic properties. The Federally recognized tribes of the Pueblo of Zuni and the Navajo Nation will also be notified of the undertaking and offered the opportunity to consult.

The Army seeks your concurrence on the finding of historic properties present and the determination of an adverse effect by demolition. In anticipation that you will concur that the fiscally responsible choice to the taxpayer is the demolition, a draft Memorandum of Agreement is enclosed for your review and comment.

Please contact Mr. Joseph Murphey, Historical Architect, (817) 229-1956 or <a href="joseph.murphey@us.army.mil">joseph.murphey@us.army.mil</a> with any further questions regarding this matter. Mr. Murphey has over two decades of full time cultural resource management expertise with the Army and specializes in World War II and Cold War resources at a national level.

Sincerely,

Eric W. Verwers

Chief, Planning, Environmental, And Regulatory Division

Enclosures