

DEPARTMENT OF THE ARMY

FORT WINGATE DEPOT ACTIVITY
P.O. BOX 268
FORT WINGATE, NM 87316

091153

December 16, 2010

Ms. Jan V. Biella Historic Preservation Division 407 Galisteo Street, Suite 236

Santa Fe. NM 87501

VRE

Dear Ms Biella:

The Army is preparing to implement the field sampling activities described in the Fort Wingate Depot Activity (FWDA) Parcel 6 and 23 RFI Work Plans (Work Plans). The Work Plan for Parcel 6 dated April 30, 2010 along with the NMED comments from their letter dated October 21, 2010 will be implemented (field sampling) in February through May 2011. Igloo interiors will not be sampled at this time. The Work Plan for Parcel 23 dated April 6, 2010 was approved by the NMED on May 25, 2010. The field sampling under the Parcel 23 Work Plan will also be implemented in February through May 2011. The Army seeks Pueblo of SHPO comments to comply with the Programmatic Agreement regarding cultural resources sites in the two parcels.

Parcel 6 contains several buildings on the west side of the Workshop Arca, the Western Landfill including portions in Parcel 7, igloo Block B, and several former temporary buildings. Buildings 541 and 542 were leased to TPL, Inc up through 2007. To address past activities conducted in Parcel 6, soil and groundwater samples (if encountered) will be collected. All of the surface soil samples are in the near vicinity of the buildings and former buildings; soil boring locations for deeper samples will be drilled very close to buildings or in areas previously disturbed, such as driveways, around cesspools or septic tanks. Cultural monitoring was provided by the Zuni and Navajo during the geophysical investigation completed at AOC 78/82 and 79 during July 8-25, 2008. No further action is required at AOC 78/82 and 79.

Parcel 23 contains the former Central Landfill and two former temporary buildings. To address past activities conducted in Parcel 23, soil and groundwater samples (if encountered) will be collected. Soil samples will be collected at the former buildings sites and at the former landfill location all of which have been previously disturbed.

A summary of the fieldwork described in the Work Plans and the NODs are enclosed. A figure showing the locations of areas to be sampled (encircled by heavy green line), and the locations of known Cultural sites (green dots inside a blue circle) are also enclosed. As evident by the figures, a few of the sample locations are in the vicinity of identified cultural sites.

The Army is seeking SHPO comments pursuant to the Programmatic Agreement (PA). We seek SIIPO concurrence of "No Effect" for this action based on the operating procedures outlined below. We would like to propose the following options:

- a. Based on review of the Parcel 6 and 23 RFI Work Plan activities and review of the enclosed summary memo and figure, the Tribes are comfortable to make a determination that Cultural Sites are a sufficient distance away from the sampling locations as to not be encountered during the field work or are in areas previously disturbed. If cultural resources are inadvertently encountered during the investigation, the Army will immediately notify the Tribal cultural points of contact for consultation per section 1.8 of the PA. At stated in Section 1.4 of the PA, avoidance of historic properties and potential NAGPRA cultural items will be the first choice for RCRA permit activities.
- b. The Army Contractor can place flags to identify the sampling locations. Then, the Tribal representative(s) can visit the locations pursuant to Programmatic Agreement Sections 1.4 & 1.6 prior to sampling to inspect, then accept the sample location, or move the sample point to a nearby alternate location if this does not impact the investigation approved by NMED. This would require coordination between the Army Contractor and the Tribal cultural contact. A written report/letter of any Navajo and Zuni cultural resources monitoring/work will be required by our Contractor within 2 weeks of the conclusion of the field work for submittal to the Army.

Because the sample locations are in areas altered by construction of buildings, landfills, many years of work activities in the area, and because of the distance from the sampling locations to the identified cultural sites, we feel that either Option a or b would be reasonable, with a preference for Option a.

Please provide SHPO concurrence on this proposed action or comments within 30 days of receipt of this letter or the Army shall assume your concurrence.

Should you have any questions, or require any further information concerning the above, please contact Ms. Nancy Parrish (Fort Wingate Project Archaeologist) of the U.S. Army Corps of Engineers, Fort Worth District, at (817) 886-1725, or by email at nancy.a.parrish@usace.army.mil.

Sincerely.
Mark Patterson

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BRAC Environmental Coordinator

Fort Wingate Depot Activity

Enclosures

CF:

David Cobrain, NMED, HWB Chuck Hendrickson, U.S. EPA Region 6 Steve Smith, USACE-SWF

Concur with recommendations as proposed,

for NM State Historic Preservation Officer