

Attachment 2:
Buckley Space Force Base Cultural Resources Management Program
Section 106 Project Review

In accordance with the stipulation II(D)(1)(b) of the Programmatic Agreement (PA) Among 460th Space Wing, the Colorado State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation Regarding Section 106 Consultation for Activities at Buckley Air Force Base, Colorado, Buckley Space Force is posting a notice of an adverse effects finding for the demolition project of Building 429 and 431 and the SHPO consultation letters. Per Stipulation II(D)(1)(c) of the PA, parties are under no obligation to provide comments on the effects determinations. However, should parties wish to comment, please submit all comments within 30 days of this posting to the Buckley Cultural Resource Manager Mr. Jeffrey Harrison at jeffrey.harrison.6@spaceforce.mil.

Undertaking:

Proposed Demolition of Buildings 429 and 431 at Buckley Space Force Base (BSFB).

Description:

The project includes the demolition of two Air Communication Relay Centers, Buildings 429 (5AH.2340) and 431 (5AH.2296), located north of Buttermilk Avenue and south of East Crested Butte Avenue within the Restricted Area (RA) at BSFB (Appendix A and B).

Buildings 429 and 431 pose safety concerns associated with insufficient snow load capacity on the roofing systems. Both buildings often require personnel evacuation due to roof sagging caused by heavy snow loads and significant rain events, which greatly impacts the efficiency of the operations. In addition, the buildings house mission-critical equipment that is at risk of being damaged or lost due to leaks or a potential roof collapse.

Currently Buildings 429 and 431 have been adapted to accommodate the satellite communication mission. Upon completion of the new Space-Based Infrared System (SBIRS) Operation Support Facility (SOF), all personnel and equipment from Buildings 429 and 431 will be relocated to the new facility.

Included with the demolition of Buildings 429 and 431 will be identifying and demolition of above ground and below ground utilities, removal of recoverable items, demolition of the above grade structure, and demolition of the foundation.

Consideration of Alternatives to Demolition:

Alternative 1

The first alternative involves renovating Buildings 429 and 431 for other mission needs. To bring both buildings up to current building codes and safety standards they would require a new roof system to be installed. These repairs would consist of disconnecting the ceiling from the interior walls and replacing them with a roof system capable of withstanding the required snow load capacity per 2015 International Building Code (IBC). The current cost estimate for the roof repairs is over one million dollars per

building. This alternative does not include improvements to address deficiencies associated with the 1990 Americans with Disabilities Act (ADA). It would be more cost feasible to demolish Buildings 429 and 431 and build two new buildings designed per current building codes and safety standards.

Alternative 2

The second alternative would repurpose Buildings 429 and 431 as storage facilities. However, issues with the existing roofing system would still need to be addressed before the buildings could be used as storage. It would be more cost feasible to construct new facilities that are designed for storage rather than repurposing the existing buildings that were not originally designed for storage.

Alternative 3

The third alternative evaluated leaving the buildings in place and vacant. The RA is confined by security fences and consists of multiple buildings, leaving limited space for expansion. Therefore, keeping Buildings 429 and 431 in place would limit Buckley Garrison's (B GAR) ability to utilize the space for future mission growth.

Preferred Alternative

B GAR's preferred alternative is to demolish Buildings 429 and 431 to allow for future mission growth. New facilities would replace unsafe and aging infrastructure and allow enhanced support of the B GAR satellite communication mission by providing code compliant and modernized facilities to support state of the art equipment.

Steps Taken to Identify the Area of Potential Effects (APEs):

The Area of Potential Effect (APEs) for this project encompass a staging area and Buildings 429, 430, 431, 432, 433, and 448. The physical APE includes a 25 foot buffer around the building locations and staging area to allow for the passage and usage of equipment. The indirect and cumulative APE considers the larger BSFB military cultural landscape (Appendix B).

Table1. List of Buildings in the Project APE.

Smithsonian Number	Facility Number	Facility Name	Date of Construction	Eligibility
5AH.2340	429	Air Communications Relay Center	1974	Officially Not Eligible
5AH.2341	430	Air Communications Relay Center	1971	Officially Not Eligible
5AH.2296	431	Air Communications Relay Center	1971	Officially Eligible
5AH.2297	432	Satellite Communications Ground Terminal	1971	Officially Eligible

5AH.2298	433	Electrical Power Station	1971	Officially Eligible
N/A	448	Electric Car Garage	2011	Unevaluated

Potential for Impacts to Historic Properties:

On 7 April 2021, B GAR Cultural Resources Manager Jeff Harrison, performed the project review of this undertaking in accordance with the stipulations found in the *Programmatic Agreement Among 460th Space Wing, the Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Section 106 Consultation for Activities at Buckley Air Force Base, Colorado* (termed, the PA for the purpose of this project review).

To date no archaeological surveys have been conducted, however the ground surface has been heavily disturbed over the years from past construction activities and bioturbation. There are no known archaeological resources within the APE but built cultural resources do exist. Today, the APE is covered by rock aggregate and mulch, and is a modern man-made surface with no potential for surficial archaeological materials.

The staging area will reside on a 50 X 50 foot area that is covered by a modern man-made surface (existing asphalt parking lot). Staging activities will not cause any ground disturbance to undeveloped land.

Buildings 429, 430, 431, and 433

Three Air Communication Relay Centers, Buildings 429, 430, and 431, and the Electric Power Station, Building 433, were evaluated in 2018 by Historical Research Associates, Inc. (HRA) (Beckner and Perrin 2018). Based on the results of field and archival research, HRA recommended all four resources as not National Register of Historic Places (NRHP)-eligible.

In 2019, the State Historic Preservation Office (SHPO) concurred with the Building 429 and 430 eligibility recommendations (History Colorado [HC]#75988, dated 28 May 2019). SHPO personnel did not concur with the eligibility recommendation for Building 431 and 433, and in a follow-on eligibility clarification communication (HC#75988, dated 25 June 2020) cited Criterion A significance for the buildings as they relate to historical missions.

Building 432

Building 432, Satellite Communications Ground Terminal, was also evaluated in the 2018 HRA survey. B GAR recommended Building 432 as NRHP-eligible. SHPO concurred with Building 432 eligibility recommendations (HC#75988, dated 28 May 2019).

Building 448

Building 448 is an electric golf cart storage facility that was constructed in 2011 and has not met the 50 year threshold generally used for NRHP evaluation. Building 448 does not contribute to the historical mission of Buckley and does not meet any criteria

that would make it eligible for inclusion in the NRHP under Criteria Consideration G or any other criterion for that matter.

Following the Section 106 review process found under Stipulation II(B) of the PA, Buildings 431, 432, and 433 are the only historic properties in the APE.

Determination of Effects:

Applying the criteria for evaluating the effects of the undertaking per the PA (Stipulation II(C)(3)), it is the position of B GAR that the project will result in an *Adverse Effect to Historic Properties*, specifically, Building 431 for its role it played during the Cold War-era. It is also the position of B GAR that the undertaking will result in an *indirect adverse effect to Historic Buildings* to Buildings 432 and 433 as the demolition of Building 429 and 431 will indirectly alter the setting, a contributing aspect of integrity, of the aforementioned buildings as all of the buildings were erected in the same time period and existed during the Cold War-era.

Mitigation measures for Buildings 431, 432, and 433 will be enumerated in the project memorandum of agreement (MOA) between B GAR and SHPO.

Consultation History:

On 23 April 2021, B GAR initiated the consultation for the demolition of Buildings 429 and 431 with SHPO. SHPO concurred with the initial determination effect of Adverse Effect to Historic Properties for Building 431. However, on 19 May 2021, SHPO did not agree with the APE and requested that the APE be expanded to include Buildings 430 and 433 (HC#79716, dated 19 May 2021).

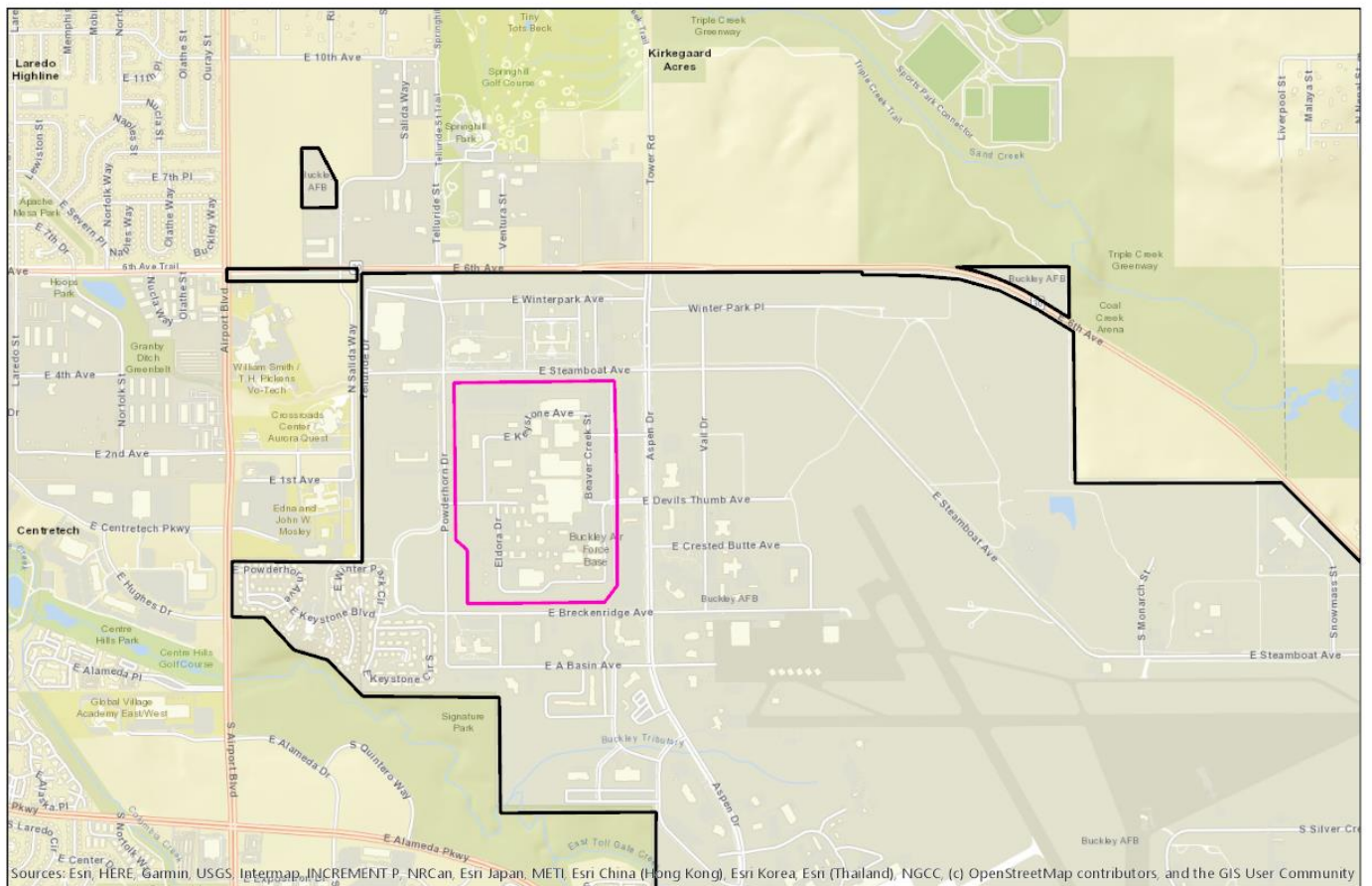
B GAR requested a follow up letter on 17 June 2021 to understand what facilitated the APE expansion. SHPO responded on 14 July 2021, (HC #79716, dated 14 July 2021), and requested that Building 432 also be included in the expanded APE as all the aforementioned buildings held a prominent role in the Cold War era.

B GAR expanded the APE to include the requested buildings and submitted the revised Section 106 to SHPO on 19 August 2021. On 24 August 2021, SHPO concurred with B GAR's determination of adverse and indirect adverse effects on the proposed demolition of Buildings 429 and 431, (HC#79716, dated 24 August 2021).

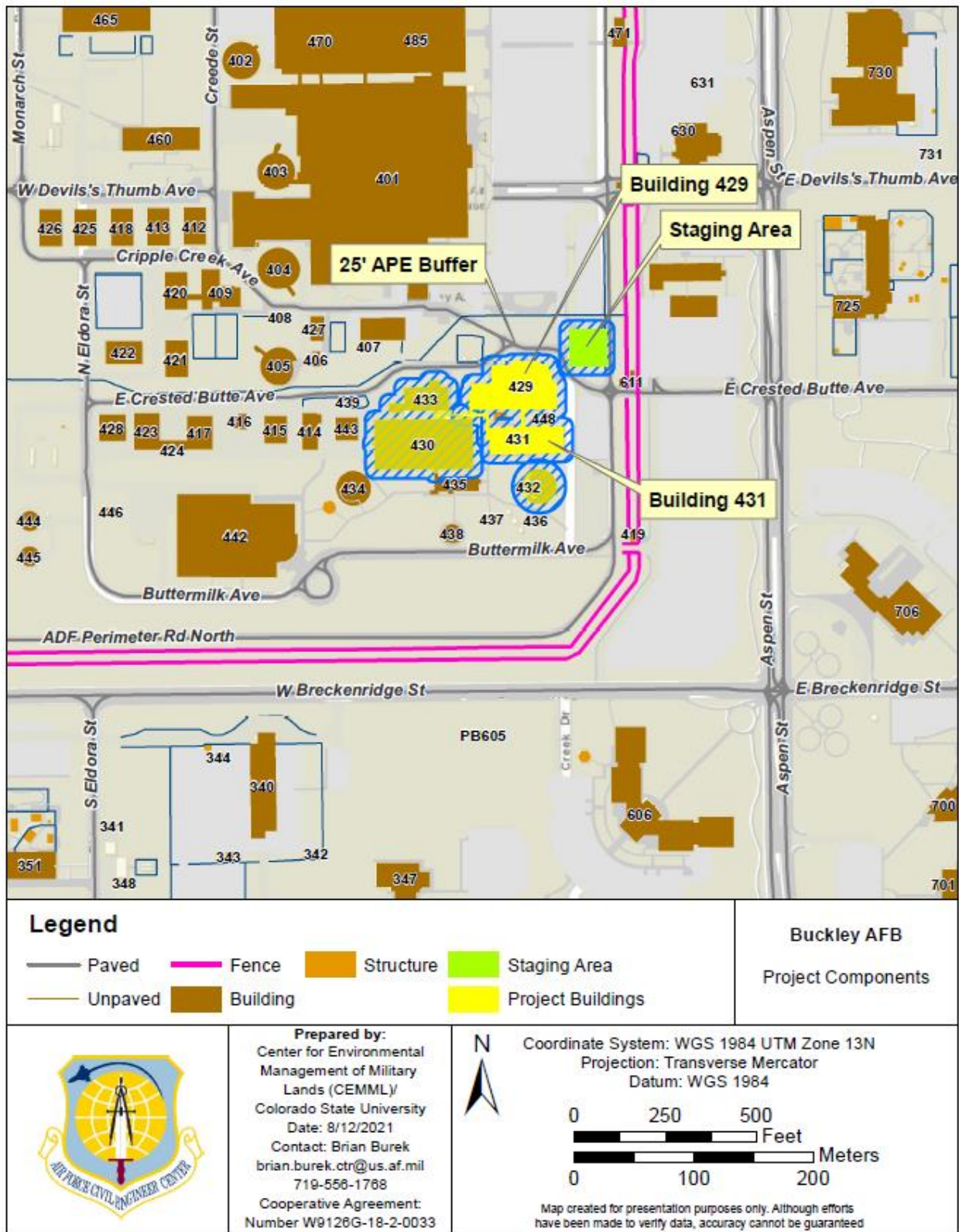
List of Appendices:

- A. Map Showing the RA within BSFB
- B. Map Showing Demolition Site and Location of Project Components
- C. Photographs Buildings 429 and 431
- D. References

Appendix. A. Map Showing the RA within Buckley SFB.



Appendix B. Map Showing Demolition Site and Project Components



Appendix C. Photos of Buildings 429 and 431

Building 429



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Building 431



Appendix D. References

Beckner, Chrisanne and Natalie K. Perrin, 2018 *Cultural Resources Report, Buckley Air Force Base, Aurora, Colorado*. Prepared by Historical Research Associates, Inc., Seattle, Washington. Submitted to U.S. Army Corps of Engineers, Northwestern Division, Omaha District, Omaha, Nebraska and AFCEC, Colorado Springs, Colorado.

Programmatic Agreement Among 460th Space Wing, the Colorado State Historic Preservation Officer, and the Advisory Council on Historic Preservation Regarding Section 106 Consultation for Activities at Buckley Air Force Base, Colorado.

SHPO Letter (HC #75988, dated 28 May 2019)

SHPO Letter (HC #75988, dated 25 June 2020)

SHPO Letter (HC#79716, dated 19 May 2021)

SHPO Letter (HC#79716, dated 14 July 2021)

SHPO Letter (HC#79716, dated 24 August 2021)



Mr. Mark S. Laudenslager, GS-13, DAF
Chief, Installation Management Flight
460th Civil Engineer Squadron
660 South Aspen Street (Stop 86)
Buckley Air Force Base, Colorado 80011-9564

RE: Proposed Demolition of Buildings 429 and 431
Buckley Air Force Base, Arapahoe County, Colorado
History Colorado No. 79716

Dear Mr. Laudenslager:

Thank you for your correspondence dated April 23, 2021, which our office received on April 30, 2021, initiating consultation for the aforementioned project under Section 106 of the National Historic Preservation Act of 1966, as amended (54 USC § 306108), and its implementing regulations, 36 CFR Part 800.

We have reviewed all documentation submitted for this project; however, we are unable to agree the defined area of potential effect (APE) is appropriate for the undertaking. We concur the described 25' buffer is appropriate for a *direct* APE. But as you know, Buildings 430 (5AH.2341) and 433 (5AH.2298) are located within the immediate vicinity of Buildings 429 (5AH.2340) and 431 (5AH.2296). Though, our office has concurred recently that a historic district or landscape likely does not exist on the property, the two buildings slated for demolition have been extant for most of the lifespan of Building 433 (5AH.2298) and that property was determined *eligible* under Criterion A. Thus, setting is likely a contributing aspect of integrity for that property and the two buildings slated for demolition are part of that setting. Thus, the demolition will very likely result in an *indirect* effect to Building 433 (5AH.2298) in addition to the *direct* effects to Building 431 (5AH.2296). We recommend the *indirect* APE be expanded to include Buildings 430 and 433.

We remain in concurrence with our prior determinations of eligibility (see letters dated May 28, 2019 and June 25, 2020; HC#75988). We also concur with your determination that the undertaking will result in an *adverse effect* to Building 431 (5AH.2296). It is our opinion the project will also adversely affect Building 433 (5AH.2298). Mitigation measures that will be enumerated in the project memorandum of agreement should address effects to both properties. We will provide comments upon receipt of documentation proposing mitigation measures for the undertaking.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR §800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Determinations of National Register eligibility subject to this letter were made in consultation pursuant to the implementing regulations of Section 106 of the National Historic Preservation Act, 36 CFR Part



800. Please note other Federal programs such as the National Register of Historic Places and the Federal Investment Tax Credit Program may have additional documentation and evaluation standards. Final determinations remain the responsibility of the Keeper of the National Register.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Mitchell K. Schaefer, Section 106 Compliance Manager, at (303) 866-2673 or mitchell.schaefer@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer
ST/mks

We are now accepting electronic consultation through our secure file transfer system, MoveIT. Directions for digital submission and registration for MoveIT are available at <https://www.historycolorado.org/submitting-your-data-preservation-programs>.



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RE: Proposed Demolition of Buildings 429 and 431
Buckley Air Force Base, Arapahoe County, Colorado
History Colorado No. 79716

Dear Mr. Laudenslager:

Thank you for your correspondence dated June 17, 2021, which our office received on June 18, 2021, regarding consultation for the aforementioned project under Section 106 of the National Historic Preservation Act of 1966, as amended (54 USC § 306108), and its implementing regulations, 36 CFR Part 800.

After receiving your letter dated June 17, 2021, we again reviewed your initial submission and took into account information from other available sources including historical aerial imagery and topographic maps. Regarding the concerns addressed in your June 17 letter, we provide the following clarifications.

If a property is determined individually eligible for inclusion in the National Register of Historic Places, a historic district or landscape does not need to be present in order for that property's setting to be considered a contributing aspect of integrity. For further guidance on this matter, please see NPS, National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation."

As you know, Buildings 431 (5AH.2296), 432 (5AH.2297), and 433 (5AH.2298) have all been determined *eligible* for inclusion in the National Register under Criterion A for association with the Cold War (see letters dated May 28, 2019 and June 25, 2020; HC#75988). Due to the prominent role that the Cold War played in American life and because that period extended into the early 1990s, it is certainly plausible to determine that such properties fall under the exception outlined in Criteria Consideration G for having achieved "exceptional significance" within the past fifty (50) years (see 36 CFR §60.4, Criteria Consideration G). Accordingly, the period of significance for Buildings 431, 432, and 433 should appropriately be extended at least into the late 1970s and 1980s.

When a property is determined eligible under Criterion A, setting is considered a contributing aspect of integrity *if* the surrounding features that existed during the period of significance remain in place. Based on available historical aerial and topographic maps, it is evident Buildings 430 (5AH.2341), 431, and 433 were all constructed by 1971. That same year Building 432 was under construction to the immediate south. And Building 429 (5AH.2340) was completed later in the 1970s. Thus, Buildings 429, 430, 431, 432, and 433 were all constructed during the period of significance for Buildings 431, 432, and 433.



Thus, removal of Buildings 429 and 431 will not only result in *direct* adverse effects to Building 431, but also *indirect* adverse effects to Buildings 431, 432, and 433. This assessment is made in accordance with 36 CFR § 800.5(a)(1–2).

After further review of available information and in accordance with 36 CFR § 800.4(a), we request the project's APE be expanded to include Buildings 430, 433, and 432. As indicated in our last letter, we concur with your determination that the undertaking will result in an *adverse effect* to Building 431. However, it is our opinion the project will also *adversely affect* Buildings 433 and 432. Mitigation measures that will be enumerated in the project memorandum of agreement should address effects to all three properties. If you would like to discuss this further, we are willing to participate in a conference call to consider the matter.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR §800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

Determinations of National Register eligibility subject to this letter were made in consultation pursuant to the implementing regulations of Section 106 of the National Historic Preservation Act, 36 CFR Part 800. Please note other Federal programs such as the National Register of Historic Places and the Federal Investment Tax Credit Program may have additional documentation and evaluation standards. Final determinations remain the responsibility of the Keeper of the National Register.

Thank you for the opportunity to comment. If we may be of further assistance, please contact Mitchell K. Schaefer, Section 106 Compliance Manager, at (303) 866-2673 or mitchell.schaefer@state.co.us.

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RE: Proposed Demolition of Buildings 429 and 431
Buckley Space Force Base, Arapahoe County, Colorado
History Colorado No. 79716

Dear Mr. Laudenslager:

Thank you for your correspondence dated and received on August 19, 2021, regarding consultation for the aforementioned project under Section 106 of the National Historic Preservation Act of 1966, as amended (54 USC § 306108), and its implementing regulations, 36 CFR Part 800.

In accordance with 36 CFR § 800.5(a)(1–2), we concur removal of Buildings 429 and 431 will result in *direct* adverse effects to Building 431, and *indirect* adverse effects to Buildings 431, 432, and 433. As avoidance and minimization of these adverse effects is not possible given the current undertaking, such will require execution of a memorandum of agreement (MOA). We will provide additional comments upon receipt of proposed mitigation measures and/or a draft MOA document.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR §800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

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