

Draft October 2024

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Draft October 2024

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# ACRONYMS AND ABBREVIATIONS

AFB	Air Force Base
DAF	Department of the Air Force
EIS	<b>Environmental Impact Statement</b>

ROI region of influence

SHPO State Historic Preservation Officer

# 1.0 TRIBAL CONSULTATION

To support this Environmental Impact Statement (EIS), the Department of the Air Force (DAF) consulted on a government-to-government basis with potentially affected tribes in the region of influence (ROI) for the 492nd Special Operations Wing Beddown. The ROI includes Davis-Monthan Air Force Base (AFB), the area surrounding the base and the airspace and ranges proposed for use. Table 1 contains a summarized list of DAF communication with tribes in the ROI for Davis-Monthan AFB. All tribes listed in Table 1 received a letter requesting government-to-government consultation under Section 106 of the National Historic Preservation Act.

Follow-up correspondence was conducted for tribes that did not respond to initial consultation and coordination efforts. This additional outreach included additional telephone and email letter correspondence. Section 106 consultation is considered complete and Davis-Monthan AFB will continue to coordinate with interested tribes throughout the EIS process.

**Table 1.** Native American Tribes Consultation

		Section	Follow-Up
Tribe	Summary Response	106 Letter	Correspondence (email/phone calls)
Ak-Chin Indian Community	None to date	9/27/24	(eman/phone cans)
Fort McDowell Yavapai Nation, Arizona	None to date	9/27/24	
Fort Sill Apache Tribe of Oklahoma	None to date	9/27/24	
Gila River Indian Community	None to date	9/27/24	
Hopi Tribe of Arizona	None to date	9/27/24	
Jicarilla Apache Nation	None to date	9/27/24	
Mescalero Apache Tribe of the Mescalero Reservation	None to date	9/27/24	
Pascua Yaqui Tribe of Arizona	None to date	9/27/24	
Pueblo of Zuni	None to date	9/27/24	
Salt River Pima-Maricopa Indian Community of the Salt River Reservation, Arizona	None to date	9/27/24	
San Carlos Apache Tribe of the San Carlos Reservation, Arizona	Requested additional information	9/27/24	
Tohono O'odham Nation	None to date	9/27/24	
Tonto Apache Tribe of Arizona	None to date	9/27/24	
White Mountain Apache Tribe	No adverse effect	9/27/24	
Yavapai-Apache Nation of the Camp Verde Indian Reservation, Arizona	None to date	9/27/24	
California Valley Miwok Tribe, California	No comments or concerns	9/27/24	None necessary
Campo Band of Diegueno Mission Indians of the Campo Indian Reservation, California	None to date	9/27/24	
Chemehuevi Indian Tribe of the Chemehuevi Reservation, California	None to date	9/27/24	
Cocopah Tribe, Arizona	None to date	9/27/24	
Colorado River Indian Tribes of the Colorado River Indian Reservation, Arizona and California	None to date	9/27/24	
Fort Mojave Indian Tribe, Arizona	None to date	9/27/24	
Havasupai Tribe, Arizona	None to date	9/27/24	
Hualapai Tribe, Arizona	None to date	9/27/24	
Kaibab Band of Paiute Indians, Utah	None to date	9/27/24	
Kickapoo Tribe of Oklahoma, Oklahoma	None to date	9/27/24	

**Table 1.** Native American Tribes Consultation

Tribe	Summary Response	Section 106 Letter	Follow-Up Correspondence (email/phone calls)
Moapa Band of Paiute Indians, Arizona, New Mexico, and Utah	None to date	9/27/24	
Navajo Nation, Arizona, New Mexico, Utah, and Colorado	None to date	9/27/24	
Paiute Indian Tribe of Utah, Utah	None to date	9/27/24	
Quechan Tribe of the Fort Yuma Indian Reservation, California and Arizona	None to date	9/27/24	
San Juan Southern Paiute Tribe, Utah	None to date	9/27/24	
Ute Mountain Ute, Utah	None to date	9/27/24	
Yavapai-Prescott Indian Tribe, Arizona	None to date	9/27/24	

## 1.1 Example Tribal Scoping Letter



### DEPARTMENT OF THE AIR FORCE 355TH WING (ACC) DAVIS-MONTHAN AIR FORCE BASE ARIZONA

09 May 2024

Colonel Scott C. Mills Commander 355th Wing 3405 South Fifth Street Davis-Monthan AFB AZ 85707-3012

Edward Velarde Chairman Jicarilla Apache Nation, NM P.O. Box 507 Dulc NM 87528

Dear Chairman Velarde

The United States Department of the Air Force (DAF) is preparing an Environmental Impact Statement (EIS) to analyze the potential environmental consequences that could result from the 492nd Special Operations Wing (492 SOW) Beddown at Davis-Monthan Air Force Base (DMAFB), Arizona,

The proposed action analyzed in this EIS addresses several strategic basing actions associated with DMAFB, Air Force Special Operations Command, and Air Combat Command (ACC). The strategic basing actions include the beddown of the 492 SOW, activation of an ACC Intelligence Squadron, and the transfer of Special Tactics and Special Operations Theater Air Operations Squadrons to DMAFB. The EIS will also analyze the retirement of A-10 aircraft from DMAFB.

The DAF will host public scoping meetings in the DMAFB local area. The dates, times, and locations of the scoping meetings are listed on the website below. The purpose of the meetings and the scoping period is to solicit comments to help effectively define the full range of environmental issues to be analyzed in the EIS. Comments provided to the DAF during the scoping period will be considered in the preparation of the Draft EIS. Additional information can be found on the project website at <a href="https://www.492sow-beddown-eis.com">www.492sow-beddown-eis.com</a>.

As a follow-up to this letter, the DAF will be sending you a separate letter that will outline the details of the proposal and formally request Government-to-Government consultation pursuant to Section 106 of the National Historic Preservation Act. In the meantime, if you have any comments or questions, please contact Ms. Barbara Long, Cultural Resources and National Environmental Policy Act Manager, at 3775 South Fifth Street, DMAFB, AZ, 85707-3012, or by email at barbara.long,3@us.af.mil or by phone (520) 228-4035.

To facilitate the incorporation of your comments into the Draft EIS, we request that comments be submitted to the project website or by mail to the address above by June 14, 2024. Thank you in advance for your assistance with this matter.

Sincerely

SCOTT C. MILLS, Colonel, USAF Commander

# 1.2 Example Tribal Section 106 Letter



### DEPARTMENT OF THE AIR FORCE 355TH WING (ACC) DAVIS-MONTHAN AIR FORCE BASE, ARIZONA

10 September 2024

Colonel Scott C. Mills
Commander
355th Wing
3405 S. Fifth Street
Davis-Monthan AFB AZ
85707-3845

Jeffrey Blythe Tribal Historic Preservation Officer (THPO) Jicarilla Apache Nation PO Box 507 Dulce NM 87528

Dear Dr. Blythe

The purpose of this letter is to invite your Tribe to participate in consultation with Davis-Monthan Air Force Base (DMAFB) pursuant to Section 106 of the National Historic Preservation Act (NHPA).

The United States Department of the Air Force (DAF) is preparing an Environmental Impact Statement (EIS) in accordance with the National Environmental Policy Act (Title 42 United States Code Section 4321 et seq.) (NEPA) to analyze the potential environmental consequences that could result from the beddown of the 492nd Special Operations Wing (492 SOW) at DMAFB, Arizona (Attachment 1). Therefore, the DAF is engaging early with all Native American Tribes who may have a vested interest in this undertaking.

The Proposed Action analyzed in the EIS addresses several actions associated with Air Force Special Operations Command (AFSOC) and Air Combat Command (ACC) occurring on DMAFB. The actions include the beddown of the 492 SOW; the transfer of Special Tactics and Special Operations Theater Air Operations Squadrons to DMAFB; activation of an ACC Intelligence Squadron; and facilities and infrastructure construction, renovation, and demolition projects. This EIS will analyze Phase 2 of the A-10 retirement from DMAFB, which would result in a net decrease of operations in the Special Use Airspace over southern Arizona and southwestern New Mexico. The analysis will include "interim conditions," defined as the timeframe between the Phase 1 and Phase 2 A-10 retirements, along with alternatives to the Proposed Action including the No Action Alternative. Additional information about the Proposed Action can be found on the project website, <a href="http://www.492sow-beddown-eis.com">http://www.492sow-beddown-eis.com</a>.

Under the Proposed Action, when compared to interim conditions, there would be a net annual decrease of 8,828 aircraft operations in the airspace and ranges proposed for use once the

A-10 aircraft are retired and the 492 SOW is fully operational. Compared to interim conditions, munitions use within Barry M. Goldwater Air Force Range would be reduced by 768,185 rounds per year, and the use of defensive countermeasures (chaff and flares) would decrease by 45,680 per year. The reduction in aircraft operations, munitions, and defensive countermeasure use would reduce the amount of noise occurring below the airspace proposed for use and on existing ranges (Attachments 2 and 3). Under the No Action Alternative, the noise reductions would be less than under interim conditions.

The DAF has proposed that the Area of Potential Effect (APE) is the areas of ground disturbance associated with construction, demolition, and renovation at DMAFB and the primary ranges and airspaces proposed for use. Based on the areas and facilities identified on Attachment 2 and the lack of archaeological sites, DMAFB has determined that there are no historic properties located within the DMAFB APE. A number of properties eligible for listing in the National Register of Historic Places exist in the portion of the APE beneath existing airspace (Attachment 3). We have made a determination that no adverse effects would occur to historic properties in this portion of the APE.

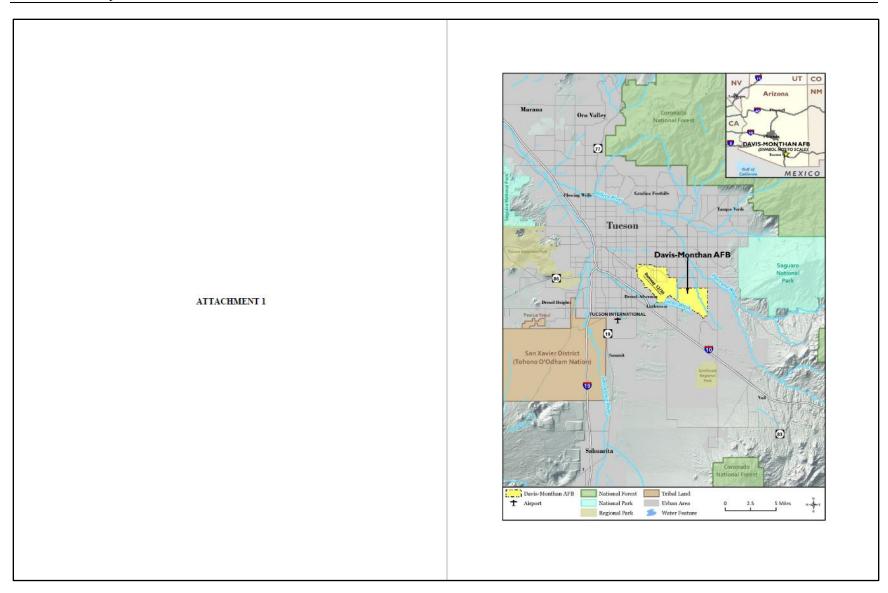
Pursuant to Section 106 of the NHPA, we invite you to provide information on any properties of historic, religious, or cultural significance that may be affected by the proposed undertaking, including compliance with the Native American Graves Protection and Repatriation Act. The DAF will also be inviting the Arizona State Historic Preservation Office (SHPO) and New Mexico Historic Preservation Division (HPD) as consulting parties.

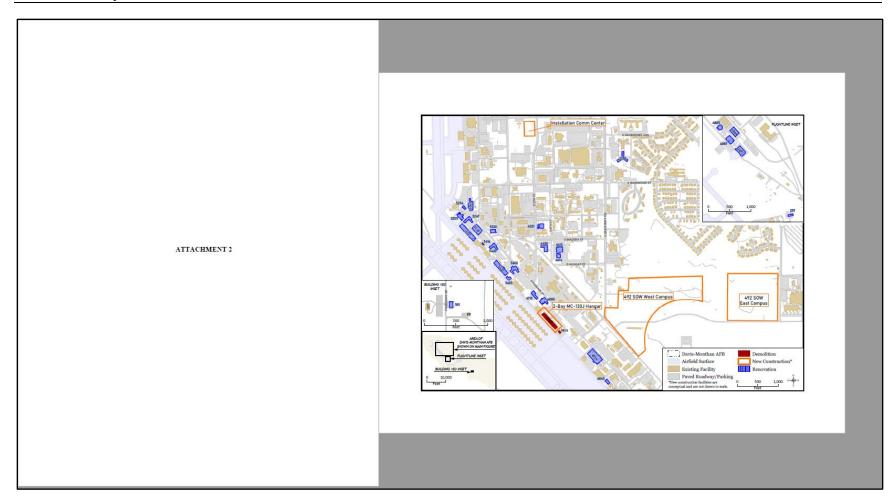
For questions or comments, please contact Ms. Barbara Long, DMAFB Cultural and Natural Resources and NEPA Program Manager, via email at barbara.long.3@us.af.mil or by phone at (520) 228-4035. For matters related to government-to-government consultation, you may contact me directly at (520) 228-3551. Please take this opportunity to complete the Response and Preferences Form (Attachment 4) to state whether your Tribe is interested in consulting on the Proposed Action. Please return this completed form in the enclosed stamped and self-addressed envelope (Attachment 5).

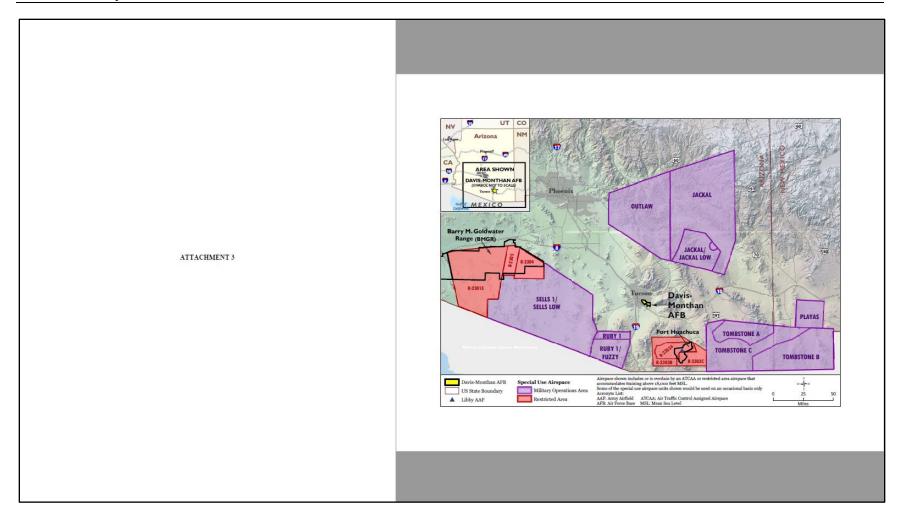
Sincerely

SCOTT C. MILLS, Colonel, USAF Commander

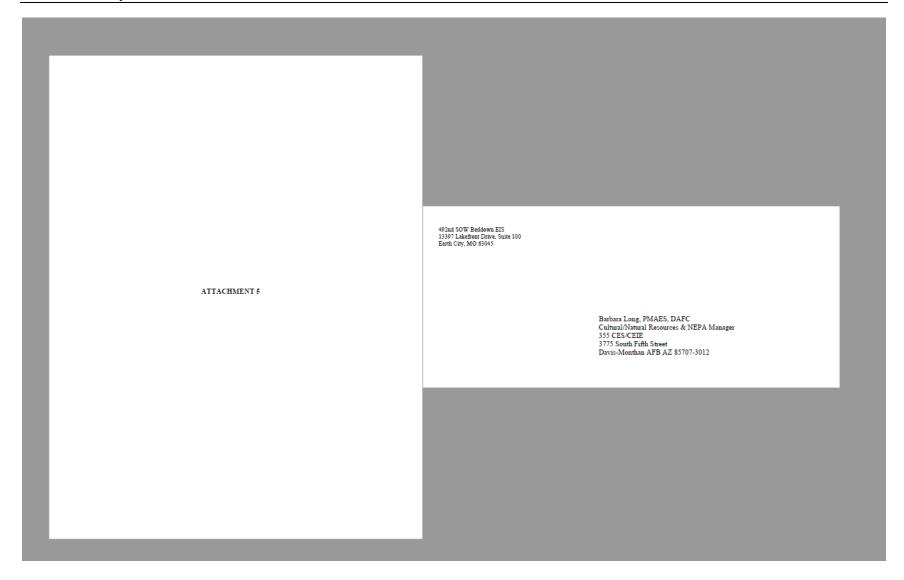
- 5 Attachments:
- 1. Regional Location Map Davis-Monthan AFB
- 2. APE Davis-Monthan AFB
- 3. Davis-Monthan AFB Airspace APE
- 4. Response and Preferences Form
- 5. Stamped, addressed return envelope







	SECTION 106 CONSULTATION QUESTIONNAIRE  Project Name: Proposed 492 SOW Beddown Environmental Impact Statement (EIS) for Davis-Monthan Air Force Base  Please check the appropriate response(s) from the list below and use the back of this form or additional sheets if you wish to make comments. You may also respond via e-mail to Barbara.long.3@us.af.mil:  We have no traditional religious, cultural properties, or other interests that may be affected by the proposed project and further consultation is not required.  There are or may be issues of concern associated with this proposed project and we wish to be included as a Section 106 Consulting Party. We prefer:  Meeting with the Air Force at a Tribal facility.
ATTACHMENT 4	Communicating with the Air Force by scheduled teleconference.  We want to continue to receive project information by mail and participate in the public involvement process.  Name of designated contact for this proposed project:  Phone:  Please print email:  Signed:  Date:  Additional comments or concerns may be written below or by separate attachment:
	Please mail response in provided postpaid envelope to:  Colonel Scott C. Mills Commander 355th Fighter Wing 3405 S. Fifth St Davis-Monthan AFB AZ 85707  Or, e-mail to: Barbara.long.3@us.af.mil



# 1.3 Native American Tribes Mailing List

**Table 2.** Native American Tribes Mailing List

1 able 2. Native American Tribes Mailing List			
Name	Tribe		
The Honorable Robert Miguel	Ak-Chin Indian Community		
Ms. Elaine Peters	Ak-Chin Indian Community		
The Honorable Lemuel Vincent	Ak-Chin Indian Community		
The Honorable Sandra Pattea	Fort McDowell Yavapai Nation, Arizona		
Ms. Clissene Lewis	Fort McDowell Yavapai Nation, Arizona		
The Honorable Paul J. Russell	Fort McDowell Yavapai Nation, Arizona		
The Honorable Jennifer Heminokeky	Fort Sill Apache Tribe of Oklahoma		
Mr. Leland Michael Darrow	Fort Sill Apache Tribe of Oklahoma		
The Honorable Pamela Eagleshield	Fort Sill Apache Tribe of Oklahoma		
The Honorable Stephen R. Lewis	Gila River Indian Community		
Ms. Reylynne Williams	Gila River Indian Community		
Mr. Larry Benallie. Jr.	Gila River Indian Community		
Mr. Stewart Koyiyumptewa	Hopi Tribe of Arizona		
The Honorable Timothy Nuvangyaoma	Hopi Tribe of Arizona		
The Honorable Craig Andrews	Hopi Tribe of Arizona		
Dr. Jeffrey Blythe	Jicarilla Apache Nation		
President	Jicarilla Apache Nation		
Vice-President	Jicarilla Apache Nation		
Ms. Holly Houghten	Mescalero Apache Tribe of the Mescalero Reservation		
The Honorable Thora Padilla	Mescalero Apache Tribe of the Mescalero Reservation		
The Honorable Duane Duffy	Mescalero Apache Tribe of the Mescalero Reservation		
Dr. Karl Hoerig	Pascua Yaqui Tribe of Arizona		
Mr. Peter Yucupicio	Pascua Yaqui Tribe of Arizona		
The Honorable Julian Hernandez	Pascua Yaqui Tribe of Arizona		
Dr. Kurt Dongoske	Pueblo of Zuni		
The Honorable Arden L. Kucate	Pueblo of Zuni		
The Honorable Cordelia Hooee	Pueblo of Zuni		
Mr. Shane Anton	Salt River Pima-Maricopa Indian Community of the Salt		
	River Reservation, Arizona		
The Honorable Martin Harvier	Salt River Pima-Maricopa Indian Community of the Salt		
	River Reservation, Arizona		
The Honorable Terry Rambler	San Carlos Apache Tribe of the San Carlos Reservation,		
	Arizona		
The Honorable Tao Etpison	San Carlos Apache Tribe of the San Carlos Reservation,		
_	Arizona		
Ms. Vernelda Grant	San Carlos Apache Tribe of the San Carlos Reservation,		
	Arizona		
Mr. Peter Steere	Tohono O'odham Nation		
The Honorable Verlon J. Jose	Tohono O'odham Nation		
The Honorable Carla L. Johnson	Tohono O'odham Nation		
The Honorable Calvin Johnson	Tonto Apache Tribe of Arizona		
The Honorable Charles Lopez	Tonto Apache Tribe of Arizona		
Ms. Jeri DeCola	Tonto Apache Tribe of Arizona		
The Honorable Kasey Velasquez	White Mountain Apache Tribe		
The Honorable Jerome Kasey, III	White Mountain Apache Tribe		
Mr. Mark Altaha	White Mountain Apache Tribe		
Mr. Vincent Randall	Yavapai-Apache Nation of the Camp Verde Indian		
	Reservation, Arizona		

**Table 2.** Native American Tribes Mailing List

	terican Tribes Mailing List
Name	Tribe
The Honorable Tanya Lewis	Yavapai-Apache Nation of the Camp Verde Indian
	Reservation, Arizona
The Honorable Ricardo Pacheco	Yavapai-Apache Nation of the Camp Verde Indian
	Reservation, Arizona
The Honorable Silvia Burley	California Valley Miwok Tribe, California
The Honorable Anjelica Paulk	California Valley Miwok Tribe, California
Ms. Mildred Burley	California Valley Miwok Tribe, California
The Honorable Marcus Cuero	Campo Band of Diegueno Mission Indians of the Campo
	Indian Reservation, California
Mr. Benjamin Dyche, Vice Chairman	Campo Band of Diegueno Mission Indians of the Campo
	Indian Reservation, California
Mr. Daniel Tsosie	Campo Band of Diegueno Mission Indians of the Campo
	Indian Reservation, California
The Honorable Glenn Lodge	Chemehuevi Indian Tribe of the Chemehuevi
	Reservation, California
Mr. Sheridan Silversmith	Chemehuevi Indian Tribe of the Chemehuevi
	Reservation, California
Mr. Ron Escobar	Chemehuevi Indian Tribe of the Chemehuevi
IVII. Noil Escooli	Reservation, California
The Honorable Sherry Cordova	Cocopah Tribe, Arizona
The Honorable Neil White	Cocopah Tribe, Arizona  Cocopah Tribe, Arizona
Mr. Frank Reece	Cocopah Tribe, Arizona Cocopah Tribe, Arizona
The Honorable Amelia Flores	Colorado River Indian Tribes of the Colorado River
The Honorable Amena Flores	Indian Reservation, Arizona and California
The Hennisht Decision I amount	Colorado River Indian Tribes of the Colorado River
The Honorable Dwight Lomayesva	
Ma Daina Etnitta	Indian Reservation, Arizona and California  Colorado River Indian Tribes of the Colorado River
Mr. Brian Etsitty	
T1. II	Indian Reservation, Arizona and California
The Honorable Tim Williams	Fort Mojave Indian Tribe, Arizona
The Honorable Shane Lewis	Fort Mojave Indian Tribe, Arizona
Ms. Charlotte Knox	Fort Mojave Indian Tribe, Arizona
The Honorable Bernadine Jones	Havasupai Tribe, Arizona
The Honorable Armando Marshall	Havasupai Tribe, Arizona
The Honorable Duane Clark	Hualapai Tribe, Arizona
Mr. Ronald Quasula Sr	Hualapai Tribe, Arizona
Ms. Ka-Voka Jackson	Hualapai Tribe, Arizona
The Honorable Roland Maldonado	Kaibab Band of Paiute Indians, Utah
The Honorable Carmen M. Bradley	Kaibab Band of Paiute Indians, Utah
Mr. Daniel Bulletts	Kaibab Band of Paiute Indians, Utah
The Honorable Darwin Kaskaske	Kickapoo Tribe of Oklahoma, Oklahoma
The Honorable Marlon Frye	Kickapoo Tribe of Oklahoma, Oklahoma
Mr. Eddie Anico	Kickapoo Tribe of Oklahoma, Oklahoma
The Honorable Vickie Simmons	Moapa Band of Paiute Indians, Arizona, New Mexico,
	and Utah
The Honorable Kami Miller	Moapa Band of Paiute Indians, Arizona, New Mexico,
	and Utah
Mr. Darren Daboda	Moapa Band of Paiute Indians, Arizona, New Mexico,
	and Utah
The Honorable Buu Nygren	Navajo Nation, Arizona, New Mexico, Utah, and
76	Colorado
The Honorable Richelle Montoya	Navajo Nation, Arizona, New Mexico, Utah, and
	Colorado
	Cololingo

**Table 2.** Native American Tribes Mailing List

Table 2. Native American Tribes Maining List			
Tribe			
Navajo Nation, Arizona, New Mexico, Utah, and			
Colorado			
Paiute Indian Tribe of Utah, Utah			
Paiute Indian Tribe of Utah, Utah			
Paiute Indian Tribe of Utah, Utah			
Quechan Tribe of the Fort Yuma Indian Reservation,			
California and Arizona			
Quechan Tribe of the Fort Yuma Indian Reservation,			
California and Arizona			
Quechan Tribe of the Fort Yuma Indian Reservation,			
California and Arizona			
San Juan Southern Paiute Tribe, Utah			
San Juan Southern Paiute Tribe, Utah			
San Juan Southern Paiute Tribe, Utah			
Ute Mountain Ute, Utah			
Ute Mountain Ute, Utah			
Ute Mountain Ute, Utah			
Yavapai-Prescott Indian Tribe, Arizona			
Yavapai-Prescott Indian Tribe, Arizona			
Yavapai-Prescott Indian Tribe, Arizona			

#### 1.4 **Tribal Responses**



SAN CARLOS APACHE TRIBE Historic Preservation & Archaeology Department

P.O. Box 0 San Carlos Arizona 85550

Tel. (928) 475-5797, apachevern@yahoo.com

# **Tribal Consultation Response Letter**

May 17, 2024 Date:

Contact Name: Scott C. Mills (520) 228-4035/Barbara, long, 3@us, af, mil

Company:

Department of the Air Force - Davis-Monthan

Address:

3405 South Fifth Street Davis-Monthan AFB, AZ 85707-3012

Project Name/#:

Preparing an Environmental Impact Statement for the 492<sup>nd</sup> Special Operation Wing (492 SOW)

Beddown

### Dear Sir or Madam:

Under Section 106 and 110 of the National Historic Preservation Act, we are replying to the above referenced project. Please see the appropriate marked circle, including the signatures of Vernelda Grant, Tribal Historic Preservation Officer (THPO), and the concurrence of the Chairman of the San Carlos Apache Tribe:

O NO INTEREST/NO FURTHER CONSULTATION/NO FUTURE UPDATES We defer to the Tribe located nearest to the project area. CONCURRENCE WITH REPORT FINDINGS & THANK YOU

-REQUEST ADDITIONAL INFORMATION

I require additional information in order to provide a finding of effect for this proposed undertaking, i.e Project description \_\_\_ Map \_\_\_ Photos K Other \_ We look Loward

O NO EFFECT

NO EFFECT

I have determined that there are no properties of religious and cultural significance to the San Carlos Apache Tribe that are listed on the National Register within the area of potential effect or that the proposed project will have no effect on any such properties that may be present.

NO ADVERSE EFFECT

Properties of cultural and religious significance within the area of effect have been identified that are eligible for listing in the National Register for which there would be no adverse effect as a result of the proposed project.

O ADVERSE EFFECT

I have identified properties of cultural and religious significance within the area of potential effect that are eligible for listing in the National Register. I believe the proposed project would cause an adverse effect on these properties. Please contact the THPO for further discussion.

We were taught traditionally not to disturb the natural world in a significant way, and that to do so may cause harm to oneself or one's family. Apache resources can be best protected by managing the land to be as natural as it was in pre-1870s settlement times. Please contact the THPO, if there is a change in any portion of the project, especially if Apache cultural resources are found at any phase of planning and construction. Thank you for contacting the San Carlos Apache Tribe, your time and effort is greatly appreciated.

DIRECTOR/THPO: Vernelda J. Grant, Tribal Historic Prese CONCURRENCE: Terry Rambler, Tribal Chairman



# White Mountain Apache Tribe

Office of Historic Preservation PO Box 1032 Fort Apache, AZ 85926

Ph: (928) 338-3033 Fax: (928) 338-6055

To: Scott C. Miles, Colonel, USAF Commander

Date: June 06, 2024

Re: 492<sup>nd</sup> Operations Wing Beddown at Davis-Monthan Air Force Base

The White Mountain Apache Tribe Historic Preservation Office appreciates receiving information on the project dated; <u>May 09, 2024.</u> In regards to this, please refer to the following statement(s) below.

Thank you for allowing the White Mountain Apache tribe the opportunity to review and respond to the above preparation of an EIS for the proposed 492<sup>nd</sup> Operations Wing beddown at Davis-Monthan Air Force Base, Arizona.

Please be advised, we have reviewed the information provided, we have determined the proposed project plans will have "No Adverse Effect" to the tribe's traditional cultural resources and/or historic properties. No further comments at this point.

Thank you for the continued tribal engagement and consultation, and collaborations in protecting and preserving places of cultural and historical importance.

Sincerely,

Mark Altaha

White Mountain Apache Tribe – THPO Historic Preservation Office

# CALIFORNIA VALLEY MIWOK TRIBE

14807 Avenida Central, La Grange CA 95329 Ph: (209) 931.4567
Website: http://www.californiavalleymiwok.us E-mail: office@cvmt.net



October 7, 2024

Barbara Long, PMAES, DAFC
Cultural / Natural Resources & NEPA Manager
355 CES/CEIE
3775 South Fifth Street
Davis-Monthan AFB AZ 85707-3012
Email: Barbara.long.3@us.af.mil

Re: United States Department of the Air Force (DAF) is preparing an EIS in accordance with NEPA to analyze the potential environmental consequences that could result from the beddown of the 492<sup>nd</sup> Special Operations Wing (492 SOW) at DMAFB, Arizona

Dear Barbara,

The California Valley Miwok Tribe is in receipt of a letter signed by the honorable Scott C. Mills, Colonel, USAF Commander, dated September 10, 2024. It is the understanding of the Tribe that the United States Department of the Air Force (DAF) is preparing an EIS in accordance with NEPA to analyze the potential environmental consequences that could result from the beddown of the 492<sup>nd</sup> Special Operations Wing (492 SOW) at DMAFB, Arizona.

Due to the fact that the undertaking is in the state of Arizona and not in state of California, the California Valley Miwok Tribe has no comments or concerns with the United States Department of the Air Force (DAF) proposed /preparing of an EIS in accordance with NEPA to analyze the potential environmental consequences that could result from the beddown of the 492<sup>nd</sup> Special Operations Wing (492 SOW) at DMAFB, Arizona.

Respectfully,

Silvia Burley, Chairperson

Anjelica Paulk, Vice Chairperson

augeleen Paulk

Ashin Buley

# 2.0 STATE HISTORIC PRESERVATION OFFICER (SHPO) SCOPING LETTERS

# 2.1 Arizona State Historic Preservation Office Scoping Letter

DEPARTMENT OF THE AIR FORCE AIR FORCE CIVIL ENGINEER CENTER JOINT BASE SAN ANTONIO LACKLAND TEXAS



May 7, 2024

Mr. Nicolas Post Air Force Civil Engineer Center NEPA Division (AFCEC/CIEE) 2261 Hughes Ave, Suite 155 Lackland AFB TX 78235-9853

Ms. Kathryn Leonard, State Historic Preservation Officer (SHPO) AZ State Historic Preservation Office 1110 W. Washington Ste 100 Phoenix, AZ 85007

Dear Ms. Leonard,

The United States Department of the Air Force (DAF) is preparing an Environmental Impact Statement (EIS) to analyze the potential environmental consequences that could result from the 492nd Special Operations Wing (492 SOW) Beddown at Davis-Monthan Air Force Base (DMAFB), Arizona.

The Proposed Action analyzed in this EIS addresses several programmatic basing actions associated with DMAFB, Air Force Special Operations Command (AFSOC), and Air Combat Command (ACC). The programmatic basing actions include the beddown of the 492 SOW, activation of an ACC Intelligence Squadron, and the transfer of Special Tactics and Special Operations Theater Air Operations Squadrons to DMAFB. The EIS will also analyze the retirement of A-10 aircraft from DMAFB.

The DAF will host public scoping meetings in the DMAFB local area. The dates, times, and locations of the scoping meetings are on the website listed below. The purpose of the meetings and the scoping period is to solicit comments to help effectively define the full range of environmental issues to be analyzed in the EIS. Written comments provided to the DAF during the scoping period will be considered in the preparation of the Draft EIS. Additional information can be found on the project website at <a href="https://www.492sow-bedown-eis.com">www.492sow-bedown-eis.com</a>.

Please provide any comments by June 14, 2024, in writing to Mr. Nicolas Post, U.S. Air Force Civil Engineer Center, AFCEC/CIEE; 13397 Lakefront Drive; Suite 100 Earth City, MO 63045 or submit them via the project website. We appreciate your participation and input on this action.

Sincerely

Nicolas Post, GS-13, DAF Program Manager, NEPA Division

# 2.2 New Mexico State Historic Preservation Office Scoping Letter

### DEPARTMENT OF THE AIR FORCE

AIR FORCE CIVIL ENGINEER CENTER
JOINT BASE SAN ANTONIO LACKLAND TEXAS



May 7, 2024

Mr. Nicolas Post Air Force Civil Engineer Center NEPA Division (AFCEC/CIEE) 2261 Hughes Ave, Suite 155 Lackland AFB TX 78235-9853

Mr. Jeff Pappas, State Historic Preservation Officer (SHPO) New Mexico State Historic Preservation Office Bataan Memorial Bldg., 407 Galisteo Street; Suite 236 Santa Fe, NM 87501

Dear Mr. Pappas,

The United States Department of the Air Force (DAF) is preparing an Environmental Impact Statement (EIS) to analyze the potential environmental consequences that could result from the 492nd Special Operations Wing (492 SOW) Beddown at Davis-Monthan Air Force Base (DMAFB), Arizona.

The Proposed Action analyzed in this EIS addresses several programmatic basing actions associated with DMAFB, Air Force Special Operations Command (AFSOC), and Air Combat Command (ACC). The programmatic basing actions include the beddown of the 492 SOW, activation of an ACC Intelligence Squadron, and the transfer of Special Tactics and Special Operations Theater Air Operations Squadrons to DMAFB. The EIS will also analyze the retirement of A-10 aircraft from DMAFB

The DAF will host public scoping meetings in the DMAFB local area. The dates, times, and locations of the scoping meetings are on the website listed below. The purpose of the meetings and the scoping period is to solicit comments to help effectively define the full range of environmental issues to be analyzed in the EIS. Written comments provided to the DAF during the scoping period will be considered in the preparation of the Draft EIS. Additional information can be found on the project website at <a href="https://www.492sow-beddown-eis.com">www.492sow-beddown-eis.com</a>.

Please provide any comments by June 14, 2024, in writing to Mr. Nicolas Post, U.S. Air Force Civil Engineer Center, AFCEC/CIEE; 13397 Lakefront Drive; Suite 100 Earth City, MO 63045 or submit them via the project website. We appreciate your participation and input on this action.

Sincerely

Nicolas Post, GS-13, DAF Program Manager, NEPA Division

# 2.2.1 New Mexico State Historic Preservation Office Scoping Letter Response



# STATE OF NEW MEXICO DEPARTMENT OF CULTURAL AFFAIRS HISTORIC PRESERVATION DIVISION

Michelle Lujan-Grisham Governor BATAAN MEMORIAL BUILDING 407 GALISTEO STREET, SUITE 236 SANTA FE, NEW MEXICO 87501 PHONE (505) 827-6320 FAX (505) 827-6338

May 15, 2024

Nicholas Post AFCEC/CIEE 2261 Hughes Ave, Suite 155 Lackland AFB, TX 78235-9853

RE: 492 SOW/DM beddown (HPD log 122487)

Dear Mr. Post,

On behalf of the New Mexico State Historic Preservation Officer (SHPO), I want to thank the Air Force for giving the Historic Preservation Division (HPD) an opportunity to comment on the EIS under development for the proposed 492 SOW beddown at Davis Monthan Air Force Base (DM). I did a quick review of the public information boards for the public scoping meetings and have a few comments.

The SHPO is primarily interested in activities in the Tombstone B and C MOAs that include the development of austere airfields, helicopter landing zones, drop zones, personnel recovery and free ground or dismounted maneuver. In addition, if there are plans for the development of ground facilities or extensive ground maneuver in these MOAs, we recommend that the Air Force develop and execute a Programmatic Agreement, per 36 CFR 800.14, to complete the National Historic Preservation Act's Section 106 consultation (aka 54 USC 306108) in advance of the NEPA Record of Decision.

If you have any questions or comments, please feel free to call me directly at 505-827-4225 or email me at bob.estes@state.nm.us.

Sincerely,

Bob Estes Ph.D.

Historic preservation Specialist/Archaeology

# 3.0 STATE HISTORIC PRESERVATION OFFICER (SHPO) SECTION 106 LETTERS

### 3.1 Arizona State Historic Preservation Office Section 106 Letter



### DEPARTMENT OF THE AIR FORCE 355th FIGHTER WING DAVIS-MONTHAN AIR FORCE BASE, ARIZONA

Colonel Scott C. Mills Commander 355th Fighter Wing 3405 S. Fifth Street Davis-Monthan AFB AZ 85707

Kathryn Leonard State Historic Preservation Officer 1110 W. Washington Street Suite 100 Phoenix AZ 85007

Dear Ms. Leonard

The purpose of this letter is to invite your office to participate in consultation with Davis-Monthan Air Force Base (DMAFB) pursuant to Section 106 of the National Historic Preservation Act (NHPA).

The United States Department of the Air Force (DAF) is preparing an Environmental Impact Statement (EIS) to analyze the potential environmental consequences that could result from the beddown of the 492nd Special Operations Wing (492 SOW) at DMAFB, Arizona (see Attachment 1).

The Proposed Action analyzed in the EIS addresses several actions associated with Air Force Special Operations Command (AFSOC) and Air Combat Command (ACC) occurring on DMAFB. The actions include the beddown of the 492 SOW; the transfer of Special Tactics and Special Operations Theater Air Operations Squadrons to DMAFB; activation of an ACC Intelligence Squadron; and facilities and infrastructure construction, renovation, and demolition projects (i.e., Phase 1). In addition, the EIS will analyze Phase 2 of the A-10 retirement from DMAFB, which would result in a net decrease of operations in the Special Use Airspace (SUA) over southern Arizona and southwestern New Mexico. The EIS analysis will include "interim conditions," defined as the timeframe between the Phase 1 and Phase 2 A-10 retirements, along with alternatives to the Proposed Action including the No Action Alternative. Additional information about the Proposed Action can be found on the project website, <a href="http://www.492sow-beddown-eis.com">http://www.492sow-beddown-eis.com</a>.

The Area of Potential Effect (APE) is defined as the areas of ground disturbance (approximately 50 meters) around each location associated with construction, demolition, and renovation at DMAFB and the primary ranges and airspaces that would be used by AFSOC pilots (see Attachments 2, 3, and 4). The DAF does not know of any properties of religious and

cultural significance within the APE. The DAF has invited tribal nations associated with DMAFB and the subject SUA to consult on this undertaking.

Implementation of the proposed 492 SOW Beddown and transfer of ACC IS personnel would include the construction of 9 new facilities, demolition of 2 buildings, and 28 renovation projects. All buildings within the physical APE have been recorded and evaluated for National Register of Historic Places (NRHP) eligibility, none of which are eligible. There are 12 NRHP-eligible buildings within the visual APE (approximately 800 meters) of one building with proposed renovations. These 12 buildings are covered under the Advisory Council on Historic Preservation Program Comment for World War II and Cold War Era Army Ammunition Production Facilities and Plants. None of the facilities proposed for renovation, modification, or demolition under the Proposed Action are eligible or potentially eligible for listing in the NRHP. Additionally, no impacts to archaeological resources would be anticipated to result from implementation of the Proposed Action. All areas of the installation proposed for construction have been disturbed by previous construction or have been inventoried for archaeological resources. There are no NRHP-eligible archaeological sites within the physical APE.

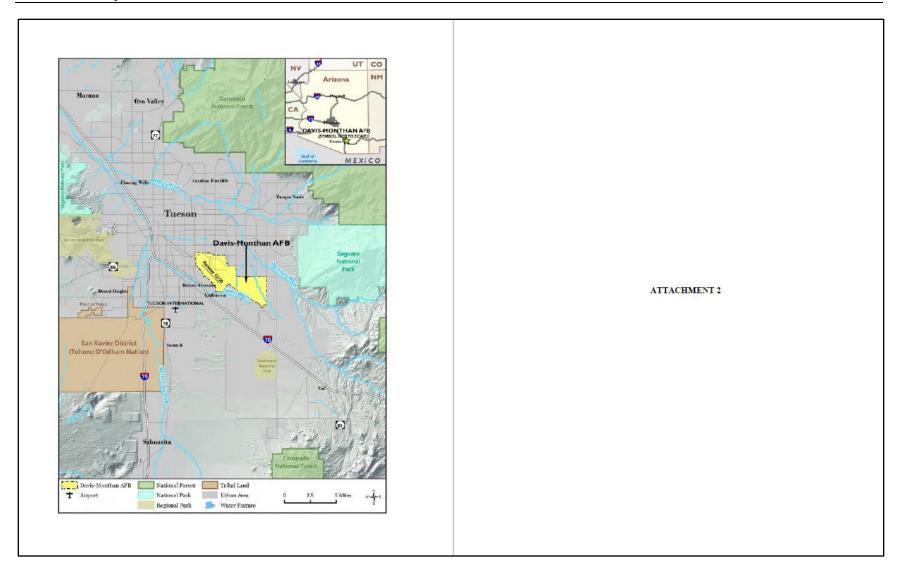
Under the Proposed Action Alternative, as compared to interim conditions, there would be a net annual decrease of 8,828 operations in the airspace and ranges proposed for use once the A-10 aircraft are retired and the 492 SOW is fully operational. Compared to interim conditions, munitions use within Barry M. Goldwater Range would be reduced by 768,185 rounds per year and the use of defensive countermeasures (chaff and flares) would decrease by 45,680 per year. The reduction in aircraft operations, munitions, and countermeasure use would reduce the amount of noise occurring below the airspace proposed for use and on existing ranges. However, when compared to the No Action Alternative, the noise reductions would be less than what would occur compared to interim conditions.

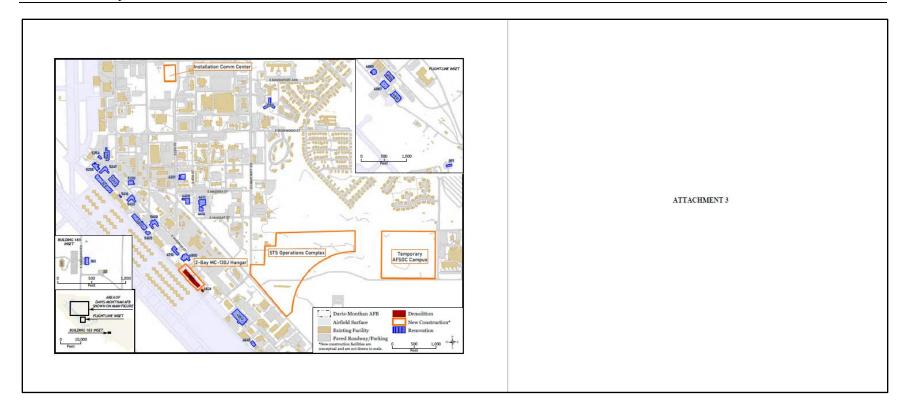
DMAFB has determined that implementation of the undertaking would have no adverse effect on historical properties. Based on the areas and facilities identified on Attachments 2 and 4 and the lack of archeological sites, DMAFB has determined there are no historic properties affected within the portion of the APE located at DMAFB. A number of NRHP eligible properties exist in the portion of the APE beneath the existing airspace (Attachment 3). DMAFB has made a determination that no adverse effects would occur to historic properties in this portion of the APE. The finding of no adverse effects has been made based on the reduction in operations, munition usage, and noise levels previously described. We request your concurrence on these determinations. If we do not hear from you within 30 days after you receive this letter, we will assume that you concur with the finding of no historic properties affected determination. We intend to notify your agency when the Draft EIS is available and welcome comments and input at that time as well. Please inform us if someone else within your agency other than you should receive such notifications.

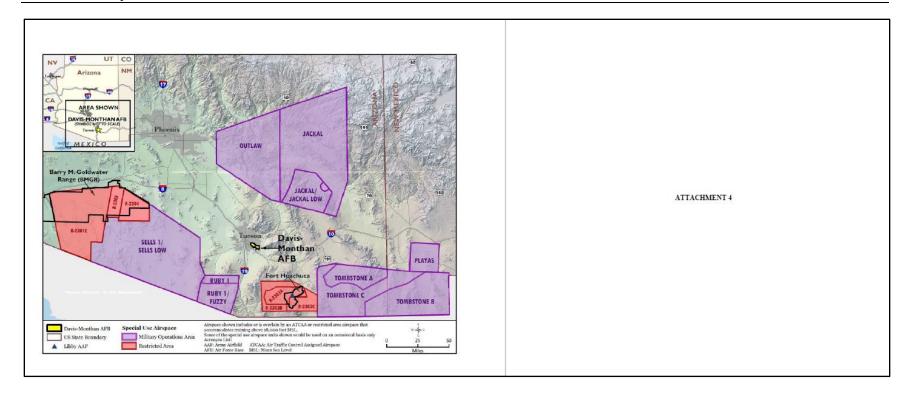
For questions or comments, please contact Ms. Barbara Long, DMAFB, Cultural Resources and NEPA Manager, via email at <a href="mailto:Barbara.long.3@us.af.mil">Barbara.long.3@us.af.mil</a> or by phone at (520) 228-4035.

<sup>&</sup>lt;sup>1</sup> Title 54 United States Code Section 306108, as implemented by Title 36 Code of Federal Regulations Part 800.

3 Sincerely BREWSTER.CHRISTOP Digitally signed by BREWSTER.CHRISTOPHER.L.1387925305 Data: 2024.09.04 10:30:08-0700\* Christopher L. Brewster, P.E., GS-14, DAFC Flight Chief, Installation Management Attachments: 1. Regional Location Map - Davis-Monthan AFB 2. APE Davis-Monthan AFB Davis-Monthan AFB Airspace APE
 NRHP Status of Buildings Proposed for Renovation, Modification, or Demolition ATTACHMENT 1







# NRHP Status of Buildings Proposed for Renovation, Modification, or Demolition

Bldg. No.	Description/Proposed Action Alternative	Date Built	NRHP Status
183	Administrative/Maintenance Facility	1956	Not Eligible
257	Crash Damaged or Disabled Aircraft Recovery Overflow Storage	2006	Not Eligible
2350	Convert to Headquarters Building	1968	Not Eligible
4201	Convert to Administrative Building	1953	Not Eligible
4400	Convert to Squadron Operations Facility	2009	Not Eligible
4413	Convert to Simulator Facility	1981	Not Eligible
4414	Convert to Simulator Facility	1972	Not Eligible
4710	Aerospace Ground Equipment Maintenance and Storage	1992	Not Eligible
4800	Squadron Operations	1953	Not Eligible
4809	Demolish for 2-Bay Hangar/AMU	1971	Not Eligible
4826	Demolish for 2-Bay Hangar/AMU	1988	Not Eligible
4845	Renovate for Interim Crash Damaged or Disabled Aircraft Recovery Storage	1995	Not Eligible
4859	Renovate for a Small Arms Vault	n/a	Not Eligible
4884	Renovate for Aerospace Ground Equipment	n/a	Not Eligible
4885	Renovate for Storage	2013	Not Eligible
4887	Refurbish for Wash Rack	2018	Not Eligible
4889	Mobility Readiness Spares Package and Classified Storage Vault	2014	Not Eligible
4891	Refurbish to Fuel Cell Facility	2015	Not Eligible
5045	Refurbish Aircraft Structural Repair	1960	Not Eligible
5230	Refurbish for Engine Shop	2005	Not Eligible
5245	Refurbish for Maintenance Backshops	1970	Not Eligible
5247	Convert to Squadron Operations	1953	Not Eligible
5251	Convert to Hangar/Maintenance Facility	1971	Not Eligible
5254	Interim Fiberglass Repair	1992	Not Eligible
5255	Addition/Alteration for Corrosion Control	1958	Not Eligible
5416	Wash Rack	2006	Not Eligible
5420	Renovate for ACC	1953	Not Eligible
5430	Weapons Load Training	1984	Not Eligible
5600	Convert to Squadron Operations Facility	1953	Not Eligible
5605	Aircraft Parts Storage and Decentralized Materials Support	1966	Not Eligible

*Key*: 492 SOW = 492nd Special Operations Wing; AMU = Aircraft Maintenance Unit; Bldg. No. = Building Number; n/a = construction date not available; NRHP = National Register of Historic Places.

### 3.1.1 Arizona State Historic Preservation Office Section 106 Concurrence Letter



# SHPO-2024-0451 (176831) Rec: 09-04-24

### DEPARTMENT OF THE AIR FORCE 355TH FIGHTER WING

### DAVIS-MONTHAN AIR FORCE BASE, ARIZONA

Colonel Scott C. Mills Commander 355th Fighter Wing 3405 S. Fifth Street Davis-Monthan AFB AZ 85707

Kathryn Leonard State Historic Preservation Officer 1110 W. Washington Street Suite 100 Phoenix AZ 85007

Dear Ms. Leonard

Draft

The purpose of this letter is to invite your office to participate in consultation with Davis-Monthan Air Force Base (DMAFB) pursuant to Section 106 of the National Historic Preservation Act (NHPA). 1

The United States Department of the Air Force (DAF) is preparing an Environmental Impact Statement (EIS) to analyze the potential environmental consequences that could result from the beddown of the 492nd Special Operations Wing (492 SOW) at DMAFB, Arizona (see Attachment 1)

The Proposed Action analyzed in the EIS addresses several actions associated with Air Force Special Operations Command (AFSOC) and Air Combat Command (ACC) occurring on DMAFB. The actions include the beddown of the 492 SOW; the transfer of Special Tactics and Special Operations Theater Air Operations Squadrons to DMAFB, activation of an ACC Intelligence Squadron; and facilities and infrastructure construction, renovation, and demolition projects (i.e., Phase 1). In addition, the EIS will analyze Phase 2 of the A-10 retirement from DMAFB, which would result in a net decrease of operations in the Special Use Airspace (SUA) over southern Arizona and southwestern New Mexico. The EIS analysis will include "interim conditions," defined as the timeframe between the Phase 1 and Phase 2 A-10 retirements, along with alternatives to the Proposed Action including the No Action Alternative. Additional information about the Proposed Action can be found on the project website, <a href="http://www.492sow-beddown-eis.com">http://www.492sow-beddown-eis.com</a>.

The Area of Potential Effect (APE) is defined as the areas of ground disturbance (approximately 50 meters) around each location associated with construction, demolition, and renovation at DMAFB and the primary ranges and airspaces that would be used by AFSOC pilots (see Attachments 2, 3, and 4). The DAF does not know of any properties of religious and

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cultural significance within the APE. The DAF has invited tribal nations associated with DMAFB and the subject SUA to consult on this undertaking.

Implementation of the proposed 492 SOW Beddown and transfer of ACC IS personnel would include the construction of 9 new facilities, demolition of 2 buildings, and 28 renovation projects. All buildings within the physical APE have been recorded and evaluated for National Register of Historic Places (NRHP) eligibility, none of which are eligible. There are 12 NRHP-eligible buildings within the visual APE (approximately 800 meters) of one building with proposed renovations. These 12 buildings are covered under the Advisory Council on Historic Preservation Program Comment for World War II and Cold War Era Army Ammunition Production Facilities and Plants. None of the facilities proposed for renovation, modification, or demolition under the Proposed Action are eligible or potentially eligible for listing in the NRHP. Additionally, no impacts to archaeological resources would be anticipated to result from implementation of the Proposed Action. All areas of the installation proposed for construction have been disturbed by previous construction or have been inventoried for archaeological resources. There are no NRHP-eligible archaeological sites within the physical APE.

Under the Proposed Action Alternative, as compared to interim conditions, there would be a net annual decrease of 8,828 operations in the airspace and ranges proposed for use once the A-10 aircraft are retired and the 492 SOW is fully operational. Compared to interim conditions, munitions use within Barry M. Goldwater Range would be reduced by 768,185 rounds per year and the use of defensive countermeasures (chaff and flares) would decrease by 45,680 per year. The reduction in aircraft operations, munitions, and countermeasure use would reduce the amount of noise occurring below the airspace proposed for use and on existing ranges. However, when compared to the No Action Alternative, the noise reductions would be less than what would occur compared to interim conditions.

DMAFB has determined that implementation of the undertaking would have no adverse effect on historical properties. Based on the areas and facilities identified on Attachments 2 and 4 and the lack of archeological sites, DMAFB has determined there are no historic properties affected within the portion of the APE located at DMAFB. A number of NRHP eligible properties exist in the portion of the APE beneath the existing airspace (Attachment 3). DMAFB has made a determination that no adverse effects would occur to historic properties in this portion of the APE. The finding of no adverse effects has been made based on the reduction in operations, munition usage, and noise levels previously described. We request your concurrence on these determinations. If we do not hear from you within 30 days after you receive this letter, we will assume that you concur with the finding of no historic properties affected determination. We intend to notify your agency when the Draft EIS is available and welcome comments and input at that time as well. Please inform us if someone else within your agency other than you should receive such notifications.

For questions or comments, please contact Ms. Barbara Long, DMAFB, Cultural Resources and NEPA Manager, via email at <a href="mailto:Barbara.long.3@us.af.mil">Barbara.long.3@us.af.mil</a> or by phone at (520) 228-4035.

October 2024

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# Sincerely

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Christopher L. Brewster, P.E., GS-14, DAFC Flight Chief, Installation Management

### Attachments:

- 1. Regional Location Map Davis-Monthan AFB
- 2. APE Davis-Monthan AFB
- 3. Davis-Monthan AFB Airspace APE
- 4. NRHP Status of Buildings Proposed for Renovation, Modification, or Demolition

Thank you for providing the additional information regarding the previous archaeological survey conducted by Statistical Research, Inc. (2017) at DFMB. SHPO concurs with the finding of "No Adverse Effect" for the proposed undertaking.

2 2

Erin Davis

Archaeological Compliance Specialist Arizona State Historic Preservation Office October 8, 2024

Draft 3-8 October 2024

### 3.2 New Mexico State Historic Preservation Office Section 106 Letter



### DEPARTMENT OF THE AIR FORCE 355TH FIGHTER WING DAVIS-MONTHAN AIR FORCE BASE, ARIZONA

Colonel Scott C. Mills Commander 355th Fighter Wing 3405 S. Fifth Street Davis-Monthan AFB AZ 85707

Michelle Ensey State Archaeologist State Historic Preservation Officer New Mexico Historic Preservation Division Bataan Memorial Building 407 Galisteo Street Suite 236 Santa Fe NM 87501

Dear Ms. Ensey

The purpose of this letter is to invite your office to participate in consultation with Davis-Monthan Air Force Base (DMAFB) pursuant to Section 106 of the National Historic Preservation Act (NHPA).

The United States Department of the Air Force (DAF) is preparing an Environmental Impact Statement (EIS) to analyze the potential environmental consequences that could result from the beddown of the 492nd Special Operations Wing (492 SOW) at DMAFB, Arizona (see Attachment 1).

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pilots (see Attachments 2 and 3). The DAF does not know of any properties of religious and cultural significance within the APE. The DAF has invited tribal nations associated with DMAFB and the subject SUA to consult on this undertaking.

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For questions or comments, please contact Ms. Barbara Long, DMAFB, Cultural Resources and NEPA Manager, via email at <u>Barbara long 3@us.af.mil</u> or by phone at (520) 228-4035.

Sincerely

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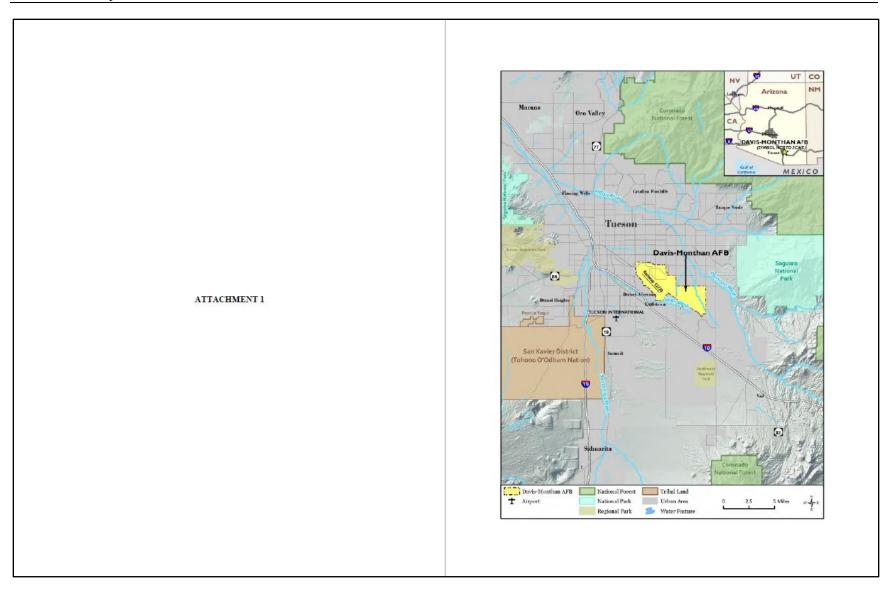
Christopher L. Brewster, P.E., GS-14, DAFC Flight Chief, Installation Management

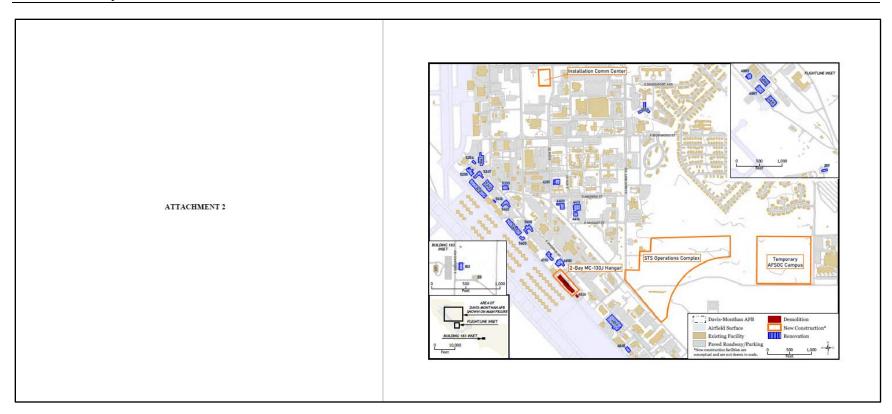
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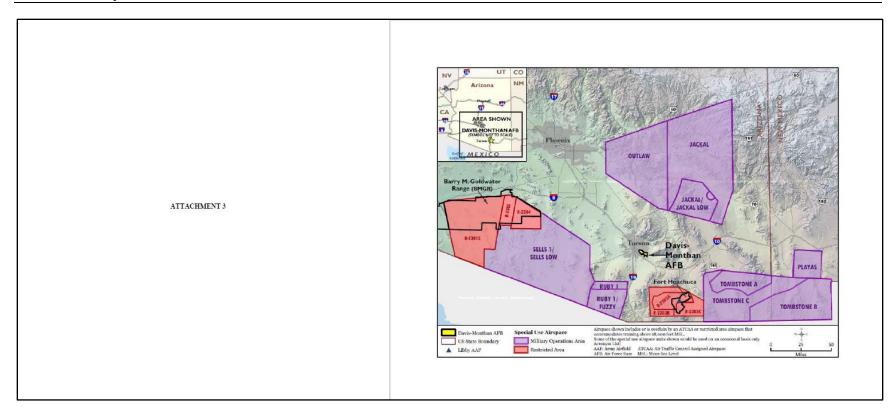
- Regional Location Map Davis-Monthan AFB
- APE Davis-Monthan AFB
- 3. Davis-Monthan AFB Airspace APE

*Draft* 3-9 October 2024

<sup>&</sup>lt;sup>1</sup> Title 54 United States Code Section 306108, as implemented by Title 36 Code of Federal Regulations Part 800.







# 3.2.1 New Mexico State Historic Preservation Office Section 106 Response Letter



Michelle Lujan Grisham, Governor STATE OF NEW MEXICO
DEPARTMENT OF CULTURAL AFFAIRS
HISTORIC PRESERVATION DIVISION

BATAAN MEMORIAL BUILDING 407 GALISTEO STREET, SUITE 236 SANTA FE, NEW MEXICO 87501 PHONE (505) 827-6320 NM.SHPO@dca.nm.gov

September 30, 2024

Mr. Christopher Brewster Flight Chief, Installation Manager 355 Civil Engineer Squadron 3775 S. Fifth Street Davis Monthan Air Force Base, AZ 85707

Re: DMAFB AZ 492 SOW Beddown (HPD log 123310)

Mr. Brewster:

I want to thank you for providing The Department of Air Forces' (DAF) Notice of Intent to (NOI) develop an Environmental Impact Statement (EIS) for the proposed beddown of the 492 Special Operations Wing at Davis-Monthan Air Force Base in Tucson (HPD log 122310). I have a few comments on the NOI, the Section 106 consultation process and the finding of effects.

Identification and Evaluation of Historic Properties

Per 36 CFR 800.4 Identification of Historic Properties and our previous comment (HPD log 122830); the NOI does not provide adequate information on the presence of historic properties within New Mexico and the Playas and Tombstone Military Operation Areas (MOAs). This information is needed to comply with the DAFs' Section 106 responsibilities as described in 36 CFR 800 Protection of Historic Properties. Without it we cannot reasonably consider the undertaking's potential effects on historic properties.

The DAF needs to include in the Section 106 consultation, and summarize in the DEIS, an inventory of previous investigations to identify and evaluate historic properties in each APE and information the properties that are eligible or unevaluated for listing in the NRHP. Please note that the DEIS should not disclose the information about the location, character, or ownership of historic properties per 36 CFR 800.11(c)(1).

This data can be accessed in the New Mexico Cultural Resource Information System (NMCRIS) by an agency or qualified contractor possessing a current User's Agreement with the Archaeological Records Management Section (ARMS) and compatible GIS software. Alternatively, the DAF can contact ARMS for assistance with this work.

Assessment of Effects

I note that DMAFB requests a finding of no adverse effect to historic properties based on the NOI. Again, the NOI provides no information concerning the activities that will take place in the MOAs, which need to complete consultation on the assessment of effects. So, The New Mexico SHPO does not concur with the finding of no adverse effect to historic properties for the following reasons.

This concludes HSPO comments on the NOI. We are looking forward to working with the DAF to advance and conclude the Section 106 consultation for this important undertaking. If you have any questions, please contact me at 505-827-4225 or email me at bob estes@dca.nm.gov.

Best regards,

John R. (Bob) Estes Ph.D.

Draft 3-13 October 2024

HPD log 122380 applies to the

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