CULTURAL RESOURCE MANAGEMENT PROGRAM
AT FORT CAMPBELL, KENTUCKY / TENNESSEE
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By

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IMSE-CAM-PWE
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Report Submitted to:

Southeast Region Office (SERO)
IMCOM-SE
Installation Management Agency
Fort McPherson, GA

Advisory Council on Historic Preservation (ACHP)
Washington, DC

Kentucky Heritage Council
State Historic Preservation Office
Frankfort, KY

Tennessee Historical Commission
Department of Environment and Conservation
Nashville, TN

December 2008
INTRODUCTION

One of the stipulations of the programmatic agreement among Fort Campbell, the State Historic Preservation Officers for the states of Kentucky and Tennessee for operations, maintenance and development at Fort Campbell (PA) calls for an annual report of the activities carried out at Fort Campbell under its terms. The PA was signed in 2004 and expires at the end of December 2008. This report describes the current activities and accomplishments of the Fort Campbell cultural resources program pertinent to that PA. Comments and recommendations as to difficulties and program direction are the opinion of the current cultural resource program coordinator.

PLANNING

Integrated Cultural Resources Management Plan

Fort Campbell last produced an Integrated Cultural Resources Plan in 2001. That document has outlasted its projected five year life-span and stands in need of major revisions. In the intervening time, the organizational and institutional setting for Cultural Resources Management at Fort Campbell have changed.

Fort Campbell has funded a full revision of the ICRMP. URS, under the guidance of Dr. Christopher Bergman and Dr. Charles Polglease will be working to produce a new ICRMP in cooperation with Fort Campbell through 2009.

Programmatic Agreements

The programmatic agreement for operations, maintenance and development at Fort Campbell itself expires as of December 31, 2008. Consultations to amend and renew the agreement have been in progress throughout the year. A new agreement for another five year period should be in place by the end of December 2008 or early January 2009.

A separate programmatic agreement for development undertakings within the Clarksville Base Historic District was also developed during 2008.

INVENTORY

Inventory includes activities of searching for and documenting all types of historic properties. Inventory is a basic federal agency responsibility established by section 110 of the National Historic Preservation Act and other legal authority. The PA also stipulates that Fort Campbell conduct a comprehensive inventory of archaeological sites and historic buildings (stipulations B.4 and B.6). Fort Campbell’s inventory program focuses on initial site detection survey of the remaining training and maneuver lands that
have not yet received any systematic survey, and on identifying those buildings with significant associations to important broad patterns of history at Fort Campbell.

**Archaeological Survey**

The PA excludes the previously disturbed parts of the cantonment area of Fort Campbell and the impact areas where unexploded ordnance is a hazard from further archaeological survey. This leaves approximately 69,000 acres of land subject to comprehensive archaeological inventory. There are initial archaeological survey reports for nearly 66,000 of those acres. Some of the areas covered by those past surveys should be re-visited to correct some oversights and other problems documented in planning studies last year.

The chart below gives the status of archaeological site discovery projects currently active or unresolved.

<table>
<thead>
<tr>
<th>Search Project</th>
<th>Contracting Agency</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>Survey of 4952 acres PCI.</td>
<td>NPS, Delivery Order 7</td>
<td>Fort Campbell identified systemic problems in all drafts submitted.</td>
</tr>
<tr>
<td>Fieldwork complete in 2001.</td>
<td></td>
<td>NPS accepted the report as final but Fort Campbell has not. NPS</td>
</tr>
<tr>
<td></td>
<td></td>
<td>administered Peer Review confirms many problematic</td>
</tr>
</tbody>
</table>

The chart below gives the status of archaeological site discovery projects currently active or unresolved.
Survey of 4128 acres PCI
Fieldwork complete in 2001.

Survey of 672 Acres
BHE FY'05
Louisville District, COE
Fieldwork completed, report in drafting process

Survey of 558 Acres
BHE FY'06
Louisville District, COE
Fieldwork completed, report in preparation

Survey of 1375 acres in Clarksville Base
BHE FY '07
Louisville District, COE
Report in progress

By current records, approximately 3,500 acres of Fort Campbell remain without an initial site discovery search after these outstanding projects are completed. The completion of this initial site discovery search should not be the end of efforts to identify archaeological sites at Fort Campbell, though. The standard site discovery method (shovel tests spaced at 20 meters apart) used both currently and in the past does not attempt to locate deeply buried sites, and is also not effective for finding other specialized archaeological site types such as the chert quarry sites now known to occur here. Different survey methods need to be used in appropriate areas to adequately search out these other types of archaeological sites that also exist at Fort Campbell.

**Archaeological Site Evaluation**

Fort Campbell currently has 287 sites listed as potentially eligible. It is the intent of Fort Campbell to fully evaluate these sites as funding is available.

There are currently five projects under contract for evaluating the significance of archaeological sites listed in the inventory as potentially eligible or unassessed:

<table>
<thead>
<tr>
<th>Evaluation Project</th>
<th>Contracting Agency</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>BHE ’03 15 sites</td>
<td>Louisville District COE</td>
<td>Draft in progress</td>
</tr>
<tr>
<td>BHE ’04 4 sites</td>
<td>Louisville District COE</td>
<td>Draft in progress</td>
</tr>
<tr>
<td>BHE ’05 3 sites evaluated, 2 inspected (chert quarry sites)</td>
<td>Louisville District, COE</td>
<td>Draft in progress</td>
</tr>
<tr>
<td>BHE ’05 Agriculture funds 5 sites</td>
<td>Louisville District, COE</td>
<td>Draft in progress</td>
</tr>
</tbody>
</table>
As is evident from the two tables above, the consultant firm of BHE has encountered difficulty in bringing archaeological survey and evaluation projects to completion at Fort Campbell. The circumstances contributing to the protracted delay in finishing these projects include many factors. BHE has met with Fort Campbell and with the contracting agency, the Louisville District of the U.S. Army Corps of Engineers to resolve the difficulties and bring all of the outstanding projects to completion within a reasonable time frame. All of the delayed projects are expected to be completed in 2009.

**Historic Buildings Inventory**

Fort Campbell did not survey or evaluate any additional buildings during this year. Fort Campbell has now examined all of the specific buildings noted in the last Integrated Cultural Resources Management Plan as needing evaluation for eligibility by National Register of Historic Places criteria.

The inventory of historic buildings at Fort Campbell includes World War II temporary buildings, residences originally constructed as part of the Capehart and Wherry housing programs, and the buildings and structures within the Clarksville Base Historic District related to the Cold War history of that weapons storage facility. The management of the World War II temporary buildings has already been considered through a nation-wide Memorandum of Agreement that allows demolition of the remaining buildings here on Fort Campbell. In a similar situation, the Capehart/Wherry era Army Family Housing has been considered eligible in the process of obtaining a formal Program Comment that allows a variety of alterations or demolition and replacement of these properties as well.

As time passes, there are more buildings and structures at Fort Campbell that approach the 50 year age at which the Army generally requires an evaluation of historic/non-historic status. The CRM program is working with the Real Property office and the Integrated Facilities Status database to assure that all buildings approaching this age are scheduled for an evaluation. Current Department of the Army guidance requires evidence of SHPO concurrence with building evaluations. The historic context for the Cold War at Fort Campbell contains a general consideration of these properties for specific relations to the Cold War, but does not consider other potential aspects of significance for buildings reaching the 50-year age.

**Cemetery Inventory**

The cultural resources program keeps information on the historic era cemeteries at Fort Campbell, even though many of these properties would not normally be eligible to the National Register of Historic Places due to criteria consideration D. In both Kentucky and Tennessee, these cemeteries are assigned archaeological site numbers when properly documented. Those cemeteries with graves or other features older than 100 years also
meet the definition of an archaeological resource in the Archaeological Resource Protection Act and are cultural resources as defined in the newly issued Army regulation 200-1.

The CRM program has detailed records including accurate GPS coordinates of 122 historic era cemeteries existing on-post, but is aware that these are not a complete inventory. Continuing reviews of earlier installation maps and other sources has resulted in a table of 185 cemeteries, 183 of which should still be located within the boundaries of Fort Campbell. Many of the known cemeteries need further research and documentation; search to find the remaining unknown ones needs to continue.

There were many cemeteries officially moved in 1942 as Camp Campbell was established. The original locations of these moved cemeteries has been established in only a very few instances. Some of these original locations still have parts of gravestones and other features left behind when the graves were moved. The degree of thoroughness with which actual remains were removed from these locations has not been assessed.

**Anticipated future inventory work for all types of historic properties:**

Future inventory work will be considered in detail in the new Integrated Cultural Resources Management Plan (ICRMP) now under development. The new ICRMP is expected to include discussion of at least the following inventory responsibilities:

1. Completion of initial archaeological survey of currently unsurveyed lands.
2. Evaluation of archaeological sites considered potentially eligible.
3. Re-survey or supplemental survey for areas in which specialized site types should be expected, or in which past survey efforts were deficient.
4. Evaluation of buildings and structures that have reached fifty years of age and have not been considered for possible historic property status.

**PROJECT REVIEW**

Several stipulations in the PA establish a system of project review consistent with the intent of the generic process in 36 CFR 800 (Stipulations C.1-C.5). The following actions took place within the review process established in the PA.

**Public Works Dig Permits**

The Cultural Resources Management program reviewed 933 dig permits for fiscal year 2008 compared to 536 reviewed in the previous year.

Fort Campbell made a radical change this year to the system for monitoring and permitting digging within the jurisdiction of Fort Campbell. The internal DPW dig
The permit was replaced. The installation now uses the Tennessee One-Call (TNOC) system to coordinate, review and track all digging projects on-post. When a construction applicant applies with the TNOC system for work to be carried out within Fort Campbell, the CRM office (along with many other utility and environmental managers) is notified of the proposed work and its location by an email from the TNOC office. The CRM program responds by sending an email stating whether there are unresolved CRM issues or not to the Fort Campbell NEPA coordinator. The NEPA coordinator compiles responses from all Environmental Division programs participating in the review, and notifies the TNOC system of the outcome.

The new system is much more consistent than the manual circulation of paper forms that it has replaced. The email traffic also provides a systematic record of all of the reviews initiated compared to the responses.

Under the new system, the number of individual reviews of proposed construction related digging has shown a very substantial increase. The new system went into effect in June of 2008. The number of permit applications showed an immediate and sustained increase over the previous numbers. Many of the TNOC permits pertained to activities installation of new cable TV lines or satellite TV systems at residential units – actions that were not being tracked by the CRM program all under the old system. But the new system also exposed several proposed actions that needed to properly finish both NEPA and CRM reviews before proceeding.

**National Environmental Policy Act (NEPA) review coordination**

The NEPA review process at Fort Campbell is one of the most important means by which planners assure that proposed projects have satisfied a number of regulatory requirements, including the requirements of section 106 of the NHPA. NEPA decision documents include:

- Records of Environmental Consideration (REC) forms when the project in question falls under categorical exclusions or has been adequately considered in another formal study,
- Environmental Assessments (EA), or
- Environmental Impact Statement (EIS).

The Cultural Resources Management program participates in the NEPA review process at all of these levels. The CRM program assists in identifying cultural resource concerns, and in coordinating the concurrent compliance with section 106 of the National Historic Preservation Act as well as the National Environmental Policy Act review.
In the great majority of these reviews, planners have already devised project plans that avoid known historic properties. The following projects are representative of the ones that documented avoidance of historic properties through the NEPA review process.

**Records of Environmental Consideration (RECs)**

The Cultural Resource program logged a review of 104 REC documents, a slight increase from the 97 reviewed last year. For the great majority of these documents, the proposed federal action/undertaking fell within the exclusions in stipulation C 1 or planners had modified it to avoid adverse effects to historic properties. In some cases, the review of REC documents led to formal correspondence to establish compliance with section 106 of the National Historic Preservation Act, but most did not require this level of attention.

A list of projects reviewed through the REC process is appended to this report.

**Environmental Analysis Documents**

The cultural resources program provided information, assistance and comments for compilation of five Environmental Analysis documents.

- Elementary School and Child Development Center
- M1117 draft programmatic environmental analysis
- Range Training Land Plan supplemental environmental analysis
- Integrated Natural Resources Management Plan
- Clarksville Base Development environmental analysis

**SHPO Project Correspondence**

In Fiscal Year 2008, formal correspondence was needed for only a few projects to establish compliance with section 106 of the National Historic Preservation Act. These included:

<table>
<thead>
<tr>
<th>Undertaking</th>
<th>Result</th>
</tr>
</thead>
<tbody>
<tr>
<td>School and Child Development Center</td>
<td>No Historic Properties</td>
</tr>
<tr>
<td>Force Protection Fence</td>
<td>No Adverse Effect</td>
</tr>
<tr>
<td>Communications Utility Duct Bank</td>
<td>No Adverse Effect</td>
</tr>
</tbody>
</table>

**Project Review Summary**

Most of the potential impacts to archaeological sites and other historic properties at Fort Campbell are avoided by the routine communications among programs that plan and implement activities in the training areas. The coordination of military training use of lands and the development of training area facilities through the ITAM program is
filtered through the GIS maps of areas known to have been searched and areas designated as “no-dig” for reasons that include the presence of cultural resources.

Both the forestry and the agricultural lease programs also involve the cultural resources program staff early in their planning cycles, so that potential conflicts with cultural resource locations are avoided. Most other potential impacts to cultural resources are identified through the NEPA checklists as projects in other programs are planned. The DPW dig permit review also insures that appropriate resolution of cultural resource issues takes place before implementation of projects. The system of review and coordination appears to be working reliably.

CONCLUSION

The Programmatic Agreement for Operations, Maintenance and Development has fostered continual improvement in the Fort Campbell Cultural Resources Management Program.

The planning stipulations have led to better understanding of the historic properties related to several major historic domains, and a better sense of the gaps in current knowledge and appropriate methods to address them in future management decisions.

The inventory stipulations have fostered an active program to work toward a complete inventory. The relative completeness of the inventory has helped by making it possible to complete the reviews of most proposed projects quickly and reliably.

The project review process allows Fort Campbell to effectively meet its mission requirements while focusing the instances of formal consultation correspondence on those cases where there is a significant historical value at issue.
Appendix

Records of Environmental consideration (REC) Reviewed by Fort Campbell CRM program Fiscal Year 2008

Abandoned Hopkinsville Railroad Disposal (REC#08-117)
Aquatic Weed Control at Children's Fishing Pond (REC#08-070)
CH2M HILL Operations Building Lease (REC#08-034)
Clarksville Gas and Water Easement (REC#08-090)
Construct Training Area 32 MOUT and OEF Training Facility (REC#08-104)
Construct 101st CAB TEMFs (REC#08-015)
Construct 159th CAB Brigade Headquarters (REC#08-013)
Construct 160th SOMO Facility (REC#08-045)
Construct 5th SFG Driving Course (REC#08-082)
Construct 5th SFG Equipment Maintenance Complex & Supply Warehouse (REC#08-011)
Construct 5th SFG Physical Therapy & Language Laboratory (REC#08-014)
Construct 5th SFG Urban Assault Course (REC#08-101)
Construct 6 Youth Soccer Fields (REC#08-056)
Construct Addition to Building 7264 (REC#08-106)
Construct Addition to High School (REC#08-074)
Construct Addition to Market Garden Container Yard (REC#08-068)
Construct ANAM Facility (REC#08-116)
Construct Army Reserve Center (REC#08-016)
Construct ATSTP Facility (REC#08-098)
Construct BACH Addition (REC #08-003)
Construct Barn at Horse Stables (REC#08-030)
Construct CDC at 46th & Indiana (REC#08-008)
Construct CDC at Gardner Hills (REC#08-047)
Construct Combat Trails in TAs 41 & 48 (REC#08-025)
Construct Convoy Battle Course (REC#08-088)
Construct DEMO 39 Breach House and Engineering Construction Lane (REC#08-054)
Construct Division Driving Course (REC#08-087)
Construct Dolan Bath House (REC#08-093)
Construct DPW Facilities (REC#08-114)
Construct Elevators in Buildings 3211 and 3212 (REC#08-097)
Construct Engineer Battalion Headquarters (REC#08-017)
Construct EODC Complex (REC#08-005)
Construct Foot March Route Walkways (REC#08-100)
Construct Fort Campbell School AT Building (REC#08-110)
Construct Handicap Fishing Piers at Lake Kyle (REC#08-046)
Construct Impact Area Boundary Road (REC#08-083)
Construct Indian Mound LZ Access Road (REC#08-022)
Construct Interim 716 MP Battalion Headquarters (REC#08-010)
Construct Joe Swing Lodge (REC#08-092)
Construct Landfill Building (REC#08-035)
Construct Military Police Equipment, BLST, and ANAM Buildings (REC#08-112)
Construct Mini-CDC (REC#08-044)
Construct Mini-Mall at 2nd BCT
Construct MOUT Facility on OP 3, 4, and 12 (REC#08-081)
Construct MOUT Facility on Range 53 (REC#08-080)
Construct New Bayonet Assault Course (REC#08-063)
Construct New Commissary (REC#08-062)
Construct New Elementary School (REC#08-059)
Construct New Hangar (REC#08-107)
Construct Range 29 Building (REC#08-113)
Construct Range 31 Sniper and Machine Gun Tower (REC#08-102)
Construct Range 31 Sniper Tower (REC#08-052)
Construct Range 44 Operations & Maintenance Building (REC#08-055)
Construct Range 46 Sniper and Machine Gun Tower (REC#08-103)
Construct Range 46 Sniper Field Fire (REC#08-076)
Construct Range 60 Complex (REC#08-091)
Construct Rapel Tower On Range 51D (REC#08-043)
Construct SABRE Heliport Road (REC#08-039)
Construct Small Arms Range Bleacher Enclosures (REC#08-023)
Construct Soldier Familt Assistance Center (REC#08-006)
Construct Training Area 22 MOUT and Cave Facilities (REC#08-079)
Construct Training Area 32 MOUT and Cave Facilities (REC#08-078)
Construct Training Area 49 MOUT Facility (REC#08-077)
Construct TSC Warehouse (REC#08-007)
Construct Unit Maintenance Facilities (REC#08-062)
Construct Warrior in Transition Fitness Center (REC#08-004)
Construct Water and Wastewater Utilities along 101st Airborne Division Rd (REC#08-061)
Construct Well Baby Clinic (REC#08-021)
Construct Youth Football Field and 400 Meter Track (REC#08-057)
Corregidor Drop Zone Access Roads Remediation (REC#08-053)
Craig Village Remodel (REC#08-105)
DRMO Lease (REC#08-058)
Expand Construction & Demolition Landfill (REC#08-028)
FCFH Lease Additions (REC#08-012)
FCFH Temporary Electrical Easement (REC#08-009)
Field Borders Maintenance (REC#08-067)
Fire Boundary Improvements (REC#08-031)
Fort Campbell Boiling Spring Expansion (REC#08-019)
FY08 Field Remediations (REC#08-089)
FY09 Prescribed Burn Program (REC#08-094)
FY09 Proposed Timber Harvest (REC#08-071)
Golden Eagle FLS Improvements (REC#08-085)
Golden Eagle FLS Improvements Modification1 (REC#08-099)
Herbicide Application for Kudzu (REC#08-095)
Implement FY08 ITAM Open Field Management Plan Action (REC#08-024)
JI Line Road Tree Removal (REC#08-072)
Medical Clinic at 2nd BCT (REC #08-002)
Pest Management Plan Update (REC#08-018)
Rail Road Track Disposal (REC#08-033)
Railyard Paving (REC#08-115)
Range 19 Zero Range (REC#08-051)
Range 42 Maintenance (REC#08-060)
Range 56 Renovations (REC#08-086)
Removal Trees from CAAF Perimeter (REC#08-096)
Renovate T-39 (REC#08-020)
Reopen Barrow Pit Adjacent to Caudle Road in TA 41 (REC #08-027)
Replace Culvert on Palmyra Road (REC#08-041)
SABRE Heliport Tree Removal (REC#08-032)
Salvage Timber Sale (REC#08-038)
T-mobile Lease (REC#08-036)
Training Area 48 Renovations (REC#08-084)
TSI in Training Area 31
Verizon Cell Tower Construction and Lease (REC#08-049)
Wastewater and Water Collection System Improvements (REC#08-050)
Wastewater Treatment Plant Upgrades (REC#08-109)
WWTP Facility Upgrade (REC08-111)