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Dear Noreen Walsh:

The U.S. Department of Veterans Affairs (VA) would like to invite the USFWS to participate with VA in our evaluation of the construction and operation of the proposed new VA national cemetery in the Southern Colorado area, an important program activity that may be of continued interest to you. The USFWS was contacted during the development of the Programmatic Environmental Assessment (PEA) for this project because your agency has either jurisdiction over the project or special expertise in respect to environmental issues related to the project. The PEA was finalized in July 2012, with a Finding of No Significant Impact (FONSI). The VA is entering the next stage of the project, which involves the preparation of a Draft Site-Specific Environmental Assessment (SEA) to evaluate the potential environmental consequences of construction and operation of the proposed new VA national cemetery in the Southern Colorado area, as described in the PEA.

As we begin to prepare the Draft SEA, please let us know if USFWS has any new information available that would assist VA in the evaluation of the project, or if additional consultation is requested. Please review this request and respond within 30 days of receipt. Additionally, the VA will hold a public scoping meeting to discuss and inform the general public about the proposed project from 6:00-8:00 PM on October 21, 2015, at the Retired Enlisted Association, 834 Emory Circle, Colorado Springs, Colorado. Please consider this letter as an invitation to attend this public scoping meeting.

Once the Draft SEA is complete and becomes available for a 30-day public comment period, your organization will be informed and provided an opportunity to provide comments on that document. The VA will consider and incorporate those comments and responses in the subsequent Final SEA.

VA wishes to take every opportunity to work together in a relationship where a Federal, State or local agency has decision-making authority or special expertise that can enhance VA’s decision making efforts. Once again, if you would like to provide comments or request additional information, please contact Mr. Glenn Elliott, U.S. Department of Veterans Affairs, Office of Construction & Facilities Management, 425 I (eye) Street, NW, Room 6W417a, Washington, D.C., 20001, or send via email to glenn.elliott@va.gov, or by telephone at (202) 632-5879.

Sincerely,

Glenn Elliott
Environmental Engineer
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management
Mr. Steve Turner  
State Historic Preservation Officer  
Colorado Office of Archaeology and Historic Preservation  
1200 Broadway  
Denver, CO 80203

SUBJECT: National Historic Preservation Act Section 106 Consultation for Construction and Operation of a New Veterans Affairs Cemetery in Southern Colorado

Dear Mr. Turner:

The U.S. Department of Veterans Affairs (VA) is preparing an Environmental Assessment (EA) in compliance with the National Environmental Policy Act (NEPA) to evaluate the potential effects associated with the proposed construction of a new national cemetery at Rolling Hills Ranch, El Paso County, Colorado (Figures 1 and 2). The purpose of this letter is to consult with the State Historic Preservation Officer (SHPO) per Section 106 of the National Historic Preservation Act of 1966 (NHPA), as amended.

The preparation of schematic documents for Phase 1 of the proposed cemetery is underway. Phase 1 will support 10-year burial projections at the site, including approximately 13,300 gravesites and several support facilities. The completed Phase I design will include a main entrance area, roadways, irrigation, utilities, landscaping, signage, committal service shelters, memorial walls, combined public information center and administration building, maintenance building complex, honor guard building, parking, public restrooms and temporary structures necessary to operationally support the cemetery. Eventual development of the cemetery over the next 100-plus years will total 374.3 acres, all of which is to be considered in the Area of Potential Effects (APE). Future development phases will include additional consultation as necessary.

**Project Location**

The cemetery is to be located on property at Rolling Hills Ranch, in El Paso County, Colorado. It is located approximately 12 miles east-southeast of the City of Colorado Springs and is generally east of Marksheffel Road, between Bradley and Drennan Road. It is 374.3 acres in size.

**Area of Potential Effect**

Per NHPA Sections 800.4(a)(1) and 800.16(d), the APE for the undertaking was determined for both the archaeological (below-ground) and above-ground historic properties. For these projects, the APE is considered to be the 374.3 acres on which the cemetery will be constructed and a ¼-acre viewshed area.
Historic Resources in the Area of Potential Effect

The entire Rolling Hills Ranch property, including the project area, was surveyed in 2006 by RMC Consultants, Inc. for the Rolling Hills Ranch developer. Additional surveys were also completed, including an access road survey, a block survey of private land along Jimmy Camp Creek, an oil and gas pipeline survey, and a water pipeline survey (Bugg, 2012). Findings from these surveys were an historic farm (5EP5121), the Franceville Spur of the Denver and New Orleans Railroad (5EP2174.1), both assessed as not eligible for listing on the National Register of Historic Places (NRHP); and one historic (5EP5114) and 12 prehistoric isolated finds (5EP2583, 5EP2584, 5EP5100-5EP5106, and 5EP5111-5EP5113), all assessed as not eligible for listing on the NRHP. Site 5EP5099 is a prehistoric open camp, and four prehistoric open lithic scatters (5EP5107 – 5EP5110) were recorded and assessed as not eligible (Bugg, 2012).

Two archaeological surveys were completed in the APE specifically for the proposed new cemetery. The first survey, reported in Initial Cultural Resource Impact Prediction for the New Southern Colorado National Cemetery in El Paso County Colorado (Travis R. Bugg, Centennial Archaeology, Inc., April 30, 2012) identified six archaeological sites within the APE. These are: 5EP5103, 5EP5104, 5EP5107, 5EP5108, 5EP5109, 5EP5121.

A Class III intensive inventory of the area was not recommended because surveys had already been completed. However, the consultant (Bugg, 2012) did recommend that the previously recorded archaeological sites be revisited and evaluated for changes in condition.

As a result of that recommendation, a follow-up pedestrian survey was conducted by Marstel-Day in 2015 (Appendix A). That survey re-located all six archaeological sites and confirmed the recommendation of not eligible for the NRHP for all of the finds, with the exception of Site 5EP5103, where additional work was recommended based on additional finds during that survey.

Archaeological Sites

Six archaeological sites were identified within the APE (Table 1).

<table>
<thead>
<tr>
<th>Site</th>
<th>Description</th>
<th>Recommendation</th>
</tr>
</thead>
<tbody>
<tr>
<td>5EP5103</td>
<td>Isolated find, prehistoric scatter</td>
<td>Redraw site boundary and conduct sub-surface test excavations</td>
</tr>
<tr>
<td>5EP5104</td>
<td>Isolated find, prehistoric scatter</td>
<td>Ineligible; No further work</td>
</tr>
<tr>
<td>5EP5107</td>
<td>Open lithic scatter</td>
<td>Ineligible; no further work</td>
</tr>
<tr>
<td>5EP5108</td>
<td>Open lithic scatter</td>
<td>Ineligible; no further work</td>
</tr>
<tr>
<td>5EP5109</td>
<td>Open lithic scatter</td>
<td>Ineligible; no further work</td>
</tr>
<tr>
<td>5EP5121</td>
<td>Historic ranch/farm</td>
<td>Ineligible; no further work</td>
</tr>
</tbody>
</table>

Site 5EP5103 is recorded as an isolated find consisting of three flakes at the bottom of a northwest facing slope. This site is classified as a prehistoric lithic reduction site of unknown cultural affiliation and ineligible for listing on the National Register of Historic Places. Present conditions include a moderate ground cover of grasses, small bushes, and some cactus; and evidence of cattle grazing. Evidence of slight disturbance from animal burrows is present. The site is in good condition. A large prehistoric ceramic sherd, two smaller sherds, and a flake were observed within 15 meters east of the site, in the backdirt piles of two animal burrows.
For Site 5EP5103, it is recommend that the site boundary be redrawn to include these artifacts, the designation as an isolated find be reconsidered, the large ceramic sherd analyzed for its potential to provide a date range, and consideration be given to subsurface testing, as the observed artifacts were found in backdirt piles. It was recommended that subsurface testing take place according to a systematic grid and the soil matrix screened. If new data are recovered, reconsideration of NRHP eligibility would be warranted.

**Above-Ground Resources**

Apart from the abandoned ranch (5EP5121), which is identified as not eligible for NRHP listing, no above-ground structures identified as eligible for the NRHP are within the cemetery property or the viewshed. As shown on the map in Figure 2, surrounding land is identified as ‘Undeveloped Land.’

Because the construction of the proposed cemetery could affect Site 5EP5103, the VA would like to initiate consultation in order to discuss the recommended fieldwork at Site 5EP5103.

We look forward to meeting with you regarding Site 5EP5103 and steps forward to complete the consultation process.

Please direct all written correspondence to me at:

Mr. Glenn Elliott  
Environmental Engineer, P P/M  
U.S. Department of Veterans Affairs  
Office of Construction & Facilities Management  
425 I Street, NW, Room 6W417a  
Washington, D.C. 20001

If you have any questions or require additional information during your review, please contact me by phone at 202-632-5879 or by email at Glenn.Elliott@VA.gov.

Sincerely,

[Signature]

Glenn Elliott
Figure 1. Approximate Project Location shown on the Elsmere USGS Topographic Quad
Pursuant to the recommendations made in the Programmatic EA, six previously identified archaeological sites located within the Rolling Hills Ranch Site Option A were revisited and evaluated for changes in condition. The evaluation presented here identifies changes in the conditions of these sites from those recorded in state files and also considers the inventory report of the original survey. Sites 5EP5103, 5EP5104, 5EP5107, 5EP5108, 5EP5109, and 5EP5121 were visited October 20-22, 2015 by archaeologist Mark Durante from Marstel-Day. These sites were located using Colorado state site file information and spatial data, relying on a GPS unit. The weather during this site visit ranged from partly cloudy with a slight breeze, with temperatures in the mid-60s to low 70s on Tuesday October 20, to cloudy with sporadic to heavy rainfall, and temperatures in the upper 40s to low 50s on Wednesday October 21 and Thursday October 22. The general topographic conditions of the project area include rolling hills with low ridges and gentle slopes and several deeply incised dry streambeds with associated terraces. Soil appeared very dry and extensively cracked. Ground visibility was poor due to ground cover vegetation. Common vegetation observed included grasses, small bushes, yucca, prickly-pear cactus, and cottonwood trees. Observed fauna comprised rabbits, prairie dogs, a rattlesnake, and cattle. Slight disturbance from aeolian erosion, slope wash, and cattle grazing was evident.

Site 5EP5103 is recorded as an isolated find consisting of three flakes at the bottom of a northwest facing slope. This site is classified as a prehistoric lithic reduction site of unknown cultural affiliation and ineligible for listing on the National Register of Historic Places. Present conditions include a moderate ground cover of grasses, small bushes, and some cactus; and evidence of cattle grazing. Evidence of slight disturbance from animal burrows is present. The site is in good condition. A large prehistoric ceramic sherd, two smaller sherds, and a flake were observed within 15 meters east of the site, in the backdirt piles of two animal burrows. For site 5EP5103, we recommend that the site boundary be redrawn to include these artifacts, the designation as an isolated find reconsidered, the large ceramic sherd analyzed for its potential to provide a date range, and consideration be given to subsurface testing, as the observed artifacts were found in backdirt piles. We advise that subsurface testing take place according to a systematic grid and the soil matrix screened. If new data are recovered, reconsideration of NRHP eligibility would be warranted.

Site 5EP5104 is recorded as an isolated find consisting of two flakes and one biface on the northwest slope of a small ridge. This site is classified as a prehistoric lithic reduction site of unknown cultural affiliation and ineligible for listing on the National Register of Historic Places. Current conditions include moderate ground cover of grasses, small bushes, and some cactus; and evidence of cattle grazing. A dirt two-track road passes through the site. Aside from the impact of the two-track road, the site is in good condition. No cultural material was observed in the vicinity of site 5EP5104. No further work is recommended.

Site 5EP5107 is recorded as an open lithic scatter site consisting of 18 debitage, bone, and two biface fragments located on the western slope of a gentle ridge. This site is classified as a prehistoric lithic reduction and resource procurement/processing site of unknown cultural affiliation and ineligible for listing on the National Register of Historic Places. Current conditions include moderate ground cover of grasses, small bushes, and some cactus; and evidence of cattle grazing. The site is in good condition. No cultural material was observed in the vicinity of site 5EP5107. No further work is recommended.
Site 5EP5108 is recorded as an open lithic scatter consisting of 22 debitage, one tested cobble, one biface, and a single shard of glass on the west and northwest facing slope of a small bench. This site is classified as a lithic reduction and resource procurement site of unknown cultural affiliation and ineligible for listing on the National Register of Historic Places. Current conditions include moderate ground cover of grasses, small bushes, and some cactus and evidence of cattle grazing. Cattle have worn a thin trail across the site. Despite this impact, the site is in good condition. A single quartz flake was observed, photographed, and left in-situ at site 5EP5108. No further work is recommended.

Site 5EP5109 is recorded as an open lithic scatter consisting of 17 debitage and one core on the crest and western slope of a prominent low ridge. This site is classified as a prehistoric lithic reduction site of unknown cultural affiliation and ineligible for listing on the National Register of Historic Places. Current conditions include moderate ground cover of grasses, small bushes, and some cactus and evidence of cattle grazing. The site is in good condition. No cultural material was observed in the vicinity of site 5EP5109. No further work is recommended.

Site 5EP5121 is recorded as a historic ranch/farm or short-term habitation site consisting of five architectural features and an artifact collection containing historic ceramics, nails, cans, construction material, and farming/agricultural material located on a terrace adjacent to a significantly incised drainage. This site is classified as farming/ranching, or habitation in origin, dating to the late 1800s or early 1900s, and is ineligible for listing on the National Register of Historic Places. Current conditions include several cottonwood trees, dense ground cover of grasses, some small bushes and cactus and evidence of cattle grazing. As noted in the original report, the buildings are collapsed and in ruin, likely due to neglect. Each of the five features of the site was relocated and observed. Extant portions of foundations at features one and five were observed as well as large piles of milled lumber at features two and three. No distinct evidence of vandalism was observed. The site is immediately adjacent to a dirt two-track road allowing access to the property. Due to the conditions of the buildings this site was originally recorded as heavily disturbed. This assessment is still accurate; the site is in poor condition. However, it is worth noting that there is little evidence of subsurface disturbance. No previously unrecorded features or cultural material were observed at site 5EP5121. No further work is recommended.

The archaeological sites relocated during this field evaluation all appear to be in similar condition to that which was originally recorded. No site appears to have endured severe disturbance since their original recordation. No further work is recommended for sites 5EP5104, 5EP5107, 5EP5108, 5EP5109, and 5EP5121. For site 5EP5103 we recommend that the site boundary be recalculated, the isolated find designation be reconsidered, analysis of the larger ceramic sherd be considered, and subsurface testing considered. We advise that subsurface testing take place according to a systematic grid and the soil matrix screened. If new data were recovered or the potential to recover additional significant data evident, we would recommend that eligibility for NRHP listing be reviewed.
Dear Mr. Elliott:

Thank you for your correspondence dated February 3, 2016 that we received on February 5, 2016 initiating consultation with our office in accordance Section 106 of the National Historic Preservation Act and its implementing regulations 36 CFR part 800 for the above-referenced undertaking.

We have no objection at this time to the defined area of potential effects (APE), but we do request that you provide copies of prior correspondence and documentation as it relates to this project. Specifically we request that you provide to our office a copy of the 2012 Centennial Archaeology, Inc. report titled *Initial Cultural Resource Impact Prediction for the New Southern Colorado National Cemetery in El Paso County, Colorado* as we can find no record of this survey on file with our office. We request this information to ensure that we provide timely and appropriate comment as part of this consultation process.

Our second comment directly relates to our first and is intended to address your question of level of effort, pursuant to 36 CFR 800.4(b)(1), as it relates to site 5EP5103. As it would appear that subsurface archaeological deposits may be present at this site location—as evidenced by cultural material exposing in animal backdirt piles—we recommend that the VA consider phased subsurface identification and evaluation of this location as appears to be currently recommended by your letter. In our opinion, the initial phase should take the form of small-diameter shovel testing (measuring approximately 40-cm in diameter) spaced no more than 15-m apart in order to identify and define buried cultural deposits or horizons. Additional shovel test units and/or more formal excavation units (measuring 1-m on a side) should then be emplaced to clarify artifact concentrations or site stratigraphy as necessary. The intent of this testing is to gather sufficient information regarding the site’s National Register of Historic Places significance and integrity. Pending the results of this work, additional consultation may include additional avoidance, minimization or mitigation stipulations for this location.

Our third and final comment is a question that may be addressed following our review of the 2012 Centennial Report as requested above. As you know Section 106 requires that the agency official consider “past planning, research and studies, the magnitude and nature of the undertaking and the degree of Federal involvement, the nature and extent of potential effects on historic properties, and the likely nature and location of historic properties within the area of potential effects” as part of its evaluation; see 36 CFR 800.4(b)(1). Consequently, considering the various terrains that are present within the 374.3-acre APE, most notably stream terraces and toe slopes, we wonder whether a geoarchaeological sensitivity model should be used to fully assess and identify soils and sediments likely to contain buried cultural deposits within the APE. We further request that the results of such a model be used as a basis for identifying portions of the APE that have the highest likelihood for containing buried late-Quaternary aged cultural deposits. Once identified, recommendations for testing—similar to that described in the preceding paragraph—should follow. Likewise, this information may be used during planning to avoid potential effects to heretofore undocumented resources and high probability landforms.
The consultation process does involve other consulting parties such as local governments and Tribes, which as stipulated in 36 CFR 800.3 are required to be notified of the undertaking. Additional information provided by the local government, Tribes or other consulting parties may cause our office to re-evaluate our comments and recommendations. Please note that our compliance letter does not end the 30-day review period provided to other consulting parties.

We look forward to continued consultation with BIA and other parties, as appropriate, regarding the subject undertaking. If we may be of further assistance please contact Mark Tobias, Section 106 Compliance Manager, at (303) 866-4674 or mark.tobias@state.co.us.

Sincerely,

Steve Turner, AIA
State Historic Preservation Officer
ST/mt
February 11, 2016

Gregory Langer
Natural Resources Conservation Service
Colorado Springs Field Office
5610 Industrial Pl., Suite 100
Colorado Springs, Colorado 80916-1722

Subject: Proposed Phase I Construction of a Veterans Affairs National Cemetery in Southern Colorado

Dear Mr. Langer,

Please find the attached Farmland Conversion Impact Rating form regarding the construction and operation of a new Veterans Affairs national cemetery in the southern Colorado area. Also attached is a scaled map indicating location of the project site near the intersection of Drennan Road and Marksheffel Boulevard, Colorado Springs, Colorado 80929. In accordance with the Farmland Protection Policy Act, the VA has completed sections I and III of the Farmland Conversion Impact Rating form. Upon receipt of sections II, IV, and V from NRCS, the VA will complete sections VI and VII and return the completed form and associated site assessment score to your office for further consideration, as necessary.

If you have any comments or require any additional information, please contact me at (202) 632 5879 or Glenn.Elliott@va.gov.

Sincerely,

Glenn Elliott
Environmental Engineer
U.S. Department of Veterans Affairs
Office of Construction & Facilities Management
U.S. Department of Agriculture

FARMLAND CONVERSION IMPACT RATING

PART I (To be completed by Federal Agency)

Date Of Land Evaluation Request: January 27, 2016
Name of Project: Southern Colorado National Cemetery
Proposed Land Use: National Cemetery
Federal Agency Involved: U.S. Department of Veterans Affairs
County and State: El Paso County, Colorado

PART II (To be completed by NRCS)

Date Request Received By NRCS: 3/29/16
Person Completing Form: [Signature]

Does the site contain Prime, Unique, Statewide or Local Important Farmland? [YES □ NO □]
Acres Irrigated: [ ]
Average Farm Size: [ ]

Major Crop(s):
Farmable Land in Govt. Jurisdiction: Acres: %
Amount of Farmland As Defined in FPPA:
Acres: %

Name of Land Evaluation System Used:
Name of State or Local Site Assessment System:
Date Land Evaluation Returned by NRCS:

PART III (To be completed by Federal Agency)

Alternative Site Rating

A. Total Acres To Be Converted Directly: 65
B. Total Acres To Be Converted Indirectly: 0
C. Total Acres In Site: 65

PART IV (To be completed by NRCS) Land Evaluation Information

A. Total Acres Prime And Unique Farmland
B. Total Acres Statewide Important or Local Important Farmland
C. Percentage Of Farmland in County Or Local Govt. Unit To Be Converted
D. Percentage Of Farmland in Govt. Jurisdiction With Same Or Higher Relative Value

PART V (To be completed by NRCS) Land Evaluation Criterion

Relative Value of Farmland To Be Converted (Scale of 0 to 100 Points)

<table>
<thead>
<tr>
<th>Criteria</th>
<th>Maximum Points</th>
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<tbody>
<tr>
<td>1. Area In Non-urban Use</td>
<td>(15)</td>
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<tr>
<td>2. Perimeter In Non-urban Use</td>
<td>(10)</td>
</tr>
<tr>
<td>3. Percent Of Site Being Farmed</td>
<td>(20)</td>
</tr>
<tr>
<td>4. Protection Provided By State and Local Government</td>
<td>(20)</td>
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<tr>
<td>5. Distance From Urban Built-up Area</td>
<td>(15)</td>
</tr>
<tr>
<td>6. Distance To Urban Support Services</td>
<td>(15)</td>
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<tr>
<td>7. Size Of Present Farm Unit Compared To Average</td>
<td>(10)</td>
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<tr>
<td>8. Creation Of Non-farmable Farmland</td>
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<tr>
<td>9. Availability Of Farm Support Services</td>
<td>(5)</td>
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<tr>
<td>10. On-Farm Investments</td>
<td>(20)</td>
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<tr>
<td>11. Effects Of Conversion On Farm Support Services</td>
<td>(10)</td>
</tr>
<tr>
<td>12. Compatibility With Existing Agricultural Use</td>
<td>(10)</td>
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</tbody>
</table>

TOTAL SITE ASSESSMENT POINTS: 160

PART VI (To be completed by Federal Agency) Site Assessment Criteria

(Criteria are explained in 7 CFR 658.5 b. For Corridor project use form NRCS-CPA-106)

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<thead>
<tr>
<th>Site</th>
<th>Site A</th>
<th>Site B</th>
<th>Site C</th>
<th>Site D</th>
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</table>

TOTAL POINTS (Total of above 2 lines): 260

Was A Local Site Assessment Used? [YES □ NO □]

Name of Federal agency representative completing this form: [Signature]

(See Instructions on reverse side)

Form AD-1006 (03-02)