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February 9, 2016

Ms. Lynnette Gray
Tribal Historic Preservation Officer
Cheyenne and Arapaho Tribes, Oklahoma
100 Red Moon Circle
Concho, OK 73022

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

Dear Ms. Gray:

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 respectively request that the Cheyenne and Arapaho Tribes of Oklahoma consult, 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. The 374.3 acre project site 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.

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).


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 1. Archaeological Sites within the APE.**

<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 subsurface 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>
For Site 5EP5103, it is recommended 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.'

The VA requests your input concerning any potential effects this action may have on traditional cultural properties or resources of significant to your tribe. The VA wishes to ensure that issues of concern are addressed and welcomes any comments you may have about the proposed action. 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.

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

Sincerely,

[Signature]

Glenn Elliott  
Environmental Engineer  
U.S. Department of Veterans Affairs
Figure 1. Approximate Project Location shown on the Elsmere USGS Topographic Quad
Figure 2. Project Area
Appendix A: Cultural Resources Survey Letter Report, Rolling Hills Ranch Project Area
October 21-22, 2015

Mark Durante, Marstel-Day, LLC

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 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 bifase, 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.
04/06/16

Mr. Glen Elliott,
Environment Engineer, P P/M
U.S. Department of Veterans Affairs
425 I Street NW, Room 6W417a
Washington, DC 20001

Dear Mr. Elliott,

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

On behalf of the Cheyenne and Arapaho Tribes, thank you for the notice of the referenced project. I have reviewed your Consultation request under Section 106 of the National Historic Preservation Act regarding the project proposal and commented as follows:

At this time it is determined to be **No Properties**; however, if at any time during the project implementation inadvertent discoveries are made that reflect evidence of human remains, ceremonial or cultural objects, historical sites such as stone rings, burial mounds, village or battlefield artifacts, please discontinue work and notify the THPO Office immediately. If needed, we will contact the Tribes NAGPRA representatives.

Sincerely,

[Signature]
Margaret Sutton, Tribal Historic Preservation Officer
Cheyenne-Arapaho Tribes of Oklahoma
msutton@c-a-tribes.org
405-422-7484