

INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN
FOR HURLBURT FIELD

OKALOOSA COUNTY, FLORIDA

FISCAL YEARS 2016—2020



December 2015

APPROVED BY:

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Acronyms and Abbreviations

| | | | |
|-----------|--|--------|--|
| 1 SOW | 1 st Special Operations Wing | HPP | Historic Preservation Plan |
| AAC | Air Armament Center | HQ | Headquarters |
| ACHP | Advisory Council on Historic Preservation | ICRMP | Integrated Cultural Resources Management Plan |
| AF | Air Force | INRMP | Integrated Natural Resources Management Plan |
| AFCEC | Air Force Civil Engineer Center | IRP | Installation Restoration Programs |
| AFSOC | Air Force Special Operations Command | IST | Installation Support Team |
| AFI | Air Force Instruction | LiDAR | Light Detection and Ranging |
| AHPA | Archaeological Historic Preservation Act of 1974 | MAJCOM | Major Command |
| AIRFA | American Indian Religious Freedom Act of 1978 | MFH | Military Family Housing |
| APE | Area of Potential Effect | MHPI | Military Housing Privatization Initiative |
| ARPA | Archaeological Resources Protection Act of 1979 | MOA | Memorandum of Agreement |
| BCE | Base Civil Engineer | MOU | Memorandum of Understanding |
| BRAC | Base Closure and Realignment Commission | NAGPRA | Native American Graves Protection and Repatriation Act of 1990, as amended |
| CA | Comprehensive Agreement | NEPA | National Environmental Policy Act of 1969, as amended |
| CATEX | Categorical Exclusion | NHPA | National Historic Preservation Act of 1966, as amended |
| CE | Civil Engineering | NPS | National Park Service |
| CFR | Code of Federal Regulations | NRHP | National Register of Historic Places |
| CRM | Cultural Resource Manager | NWR | New World Research |
| CRMP | Cultural Resources Management Program | PPA | Procedural Programmatic Agreement |
| DoD | U.S. Department of Defense | PA | Programmatic Agreement |
| DoDI | Department of Defense Instruction | PAO | Public Affairs Office |
| DOE | Determination of Eligibility | PEA | Permanent Exercise Area |
| DOI | Department of the Interior | POA | Plan of Action |
| EA | Environmental Assessment | POC | Point-of-Contact |
| Eglin AFB | Eglin Air Force Base | PTA | Prentice Thomas and Associates |
| EIAP | Environmental Impact Analysis Process | REC | Record of Environmental Consideration |
| EIS | Environmental Impact Statement | SFS | Security Forces Squadron |
| EO | Executive Order | SHPO | State Historic Preservation Office |
| EOD | Explosive Ordnance Disposal | SME | Subject Matter Expert |
| FOIA | Freedom of Information Act | SOI | Secretary of the Interior |
| FL | Florida | SOIS | Secretary of the Interior's Standards |
| FY | Fiscal Year | SOP | Standard Operating Procedure |

| | | | |
|------|---|--------|--|
| GIS | Geographic Information System | TCP | Traditional Cultural Property |
| GPR | Ground Penetrating Radar | THPO | Tribal Historic Preservation Officer |
| GPS | Global Positioning System | U.S. | United States |
| GTG | Government-to-Government | USACE | United States Army Corps of Engineers |
| HABS | Historic American Building Survey | USAF | United States Air Force |
| HAER | Historic American Engineering Record | USAFMS | United States Air Force Museum Services |
| | | USDA | United States Department of Agriculture |
| | | USGS | United States Geological Society |

Measurements

| | |
|-----------------|----------------------|
| ac | acre |
| amsl | above mean sea level |
| cm | centimeter |
| F | Fahrenheit |
| ft | foot / feet |
| ft ² | square foot / feet |
| ft ³ | cubic foot / feet |
| ha | hectare |
| in | inch |
| km | kilometer |
| km ² | square kilometer |
| m | meter |
| m ² | square meter |
| m ³ | cubic meter |
| mi | mile |
| mi ² | square mile |

1 Purpose

Hurlburt Field is located in the western portion of the Florida panhandle in Okaloosa County on Eglin Air Force Base (AFB). The base covers 6,634 acres, which are bounded to the north and west by Eglin AFB, to the east by the town of Mary Esther and Eglin AFB, and to the south by Santa Rosa Sound (Figure 1-1).

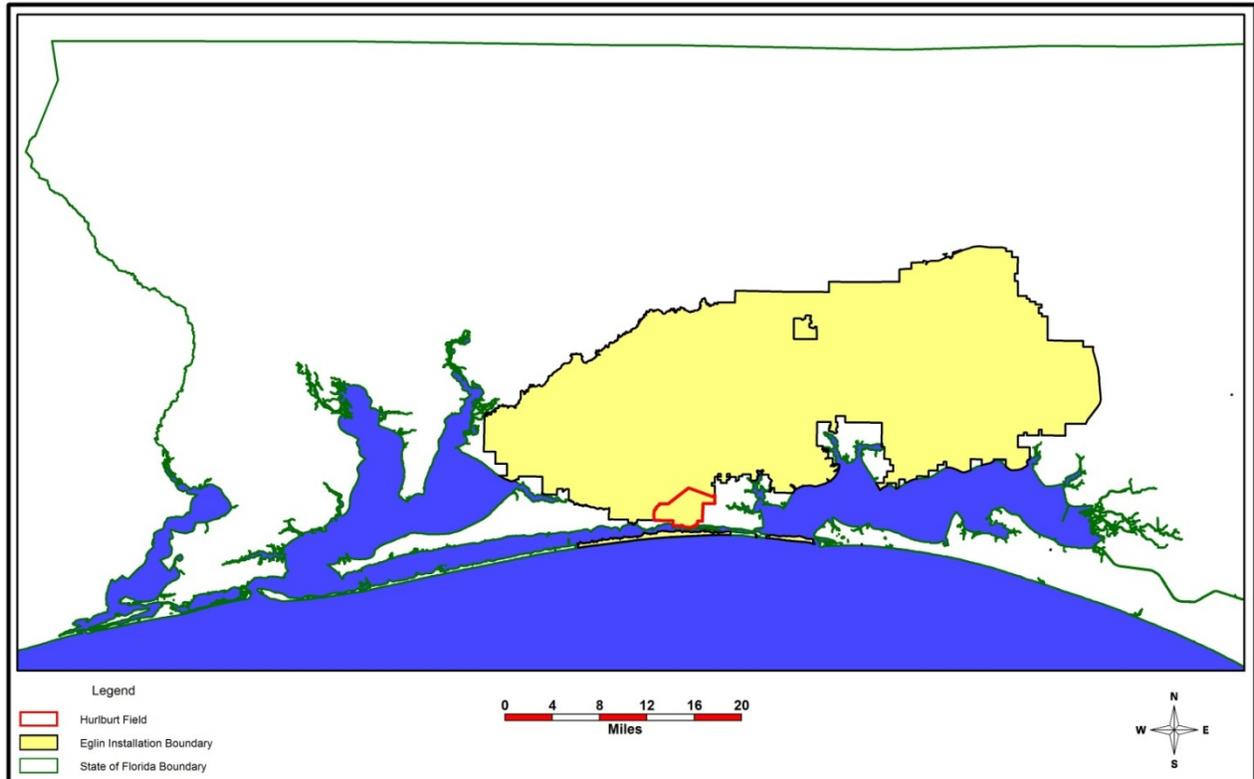


Figure 1-1: Regional map showing the location of Hurlburt Field (outlined in red).

The base is the home of the 1st Special Operations Wing (1 SOW) of the Air Force Special Operations Command (AFSOC), and serves as the command’s headquarters. Hurlburt Field also hosts thirty-four tenant units from six major commands. The mission of the base is to support the host and tenant units by providing facilities, resources, and terrain for training, housing, and recreation.

1.1 Physical Setting and Environment

Hurlburt Field is located in the Florida panhandle, which has a warm and subtropical climate with summer weather controlled by maritime tropical air from the southeast and winter weather regulated by continental polar air from the northwest. Temperatures range from highs around 91° F during July and August to lows of 37°F in January. Precipitation averages around 62 inches per year, although this amount can be affected by tropical storms, hurricanes, and tornadoes which periodically impact the region between June and November. Wind speeds average five to six miles per hour in all seasons, and

are generally from the north, except when they switch to the south-southwest during May and July (USACE 1994).

Physiographically, Hurlburt Field is located within the Coastal Lowlands province, which is characterized by beach ridge plains, shorelines, and marine terraces formed during the Pleistocene epoch. The region consists of level to rolling terrain with upland areas dissected by forested wetlands.

Vegetation within the upland areas consists of sandhill and pine flatwood communities interspersed with areas of sand pine scrub. Dominant species in these areas include longleaf and slash pine (*Pinus palustris*; *Pinus elliottii*), saw palmetto (*Serenoa repens*), wiregrass (*Aristida stricta*), galberry (*Ilex glabra*), sparkleberry (*Vaccinium arboreum*), sawbriar (*Smilax glauca*), and various species of oaks (sp. *Quercus*).

In the northern portion of the base, cypress-black gum swamp habitat is most prevalent. Shrub-dominated wetlands often border these swamps, and include species of red and black titi (*Cyrilla racemiflora*; *Cliftonia monophylla*), myrtle leaf holly (*Ilex myrtifolia*), fetterbush (*Lyonia lucida*), and Carolina St. John's wort (*Hypericum nitidum*). Mesic hammocks of southern magnolia (*Magnolia grandiflora*), live oak (*Quercus virginiana*), saw palmetto (*Serenoa repens*), and various herbaceous plants are found along the slopes of Santa Rosa Sound.

The geology of the area consists of limestone and shale formations overlain by a surficial sand and gravel aquifer. The principal source of groundwater for Hurlburt Field derives from the upper portion of the Florida aquifer, which is located 500 to 600 feet below the ground surface in the dolomitic and vesicular limestones of the Tampa Formation.

Most of the surface water in the base is constrained to the extensive wetlands, which cover fifty-two percent of the base area (Figure 1-2). Surface water from these wetlands flows into two major watersheds: the East Bay River and Swamp and the Santa Rosa Sound. The remaining surface water is found in several lakes and ponds situated in and around the golf course in the northeast portion of the base.

Twelve soil types representing twelve soil series have been identified within Hurlburt Field (USDA 1995; Figure 1-3). Most of these soils are derived from sedimentary deposits of fluvial and marine origin, and are generally sandy with low fertility and density. Dorovan Muck is the most widespread soil found on the installation, and is mainly located in the swamps and wetlands situated in the northern portion of the base. The relatively level topography of the base translates into stable soils with only a moderate risk of erosion found along the slopes of Santa Rosa Sound.

The list of animals and plants that live on the base is extensive, and includes a wide range of rare and endangered species (AFCEC 2014:5-5, 5-8). Readers are referred to the updated integrated natural resources management plan (INRMP; AFCEC 2014) and the various surveys conducted by Hurlburt's Natural Resources program for current information about the wildlife and vegetation of Hurlburt Field.

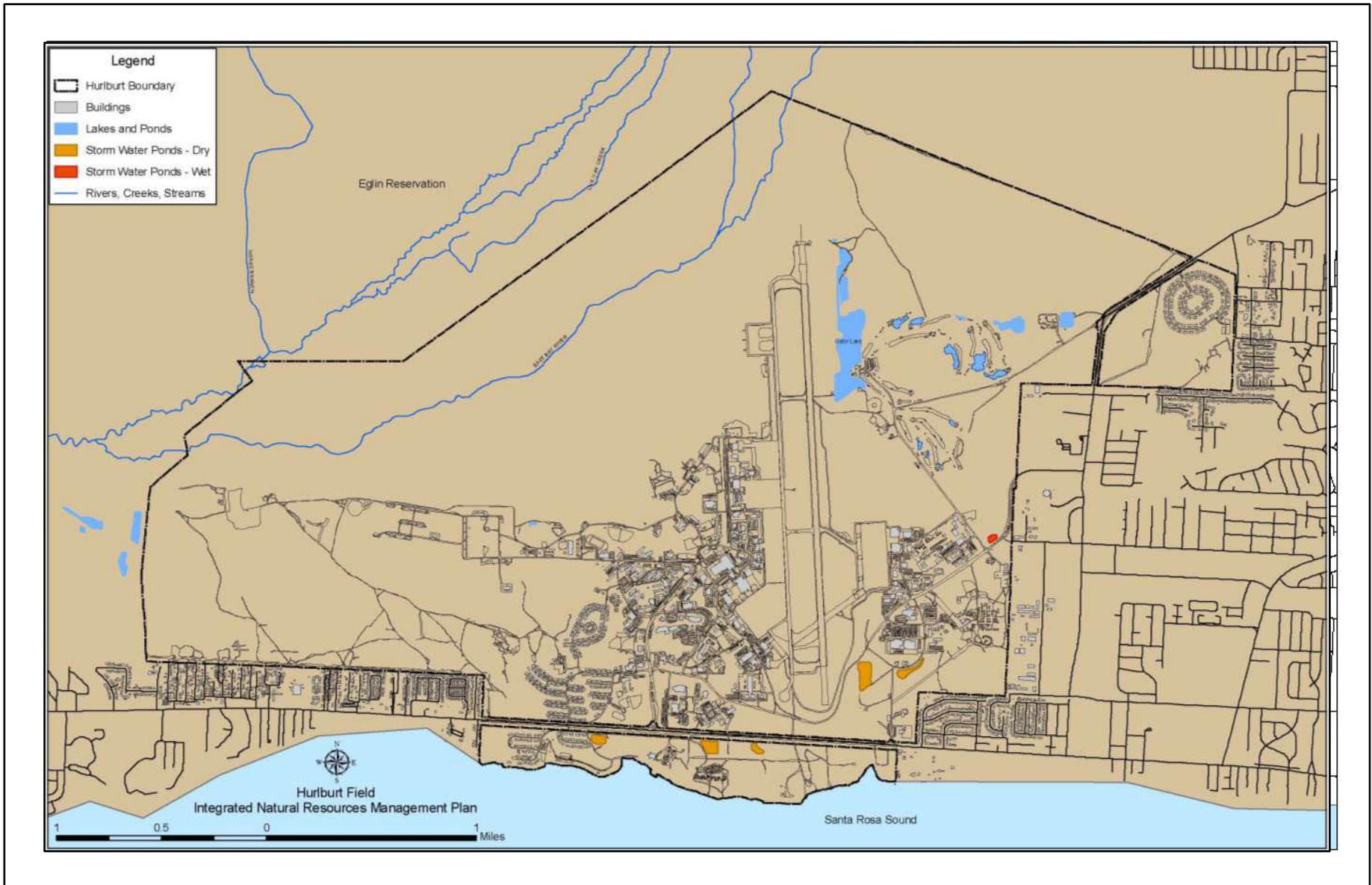


Figure 1-2: Map showing surface water on Hurlburt Field (AFCEC 2014)



Figure 1-3: Map showing soil types located on Hurlburt Field (AFCEC 2014)

1.2 Historical Perspective

Hurlburt Field was constructed in 1942 as a gunnery and small aircraft training field on Eglin AFB. Originally designated as Eglin Auxiliary Field No. 9, the field was renamed Hurlburt Field in 1944 to memorialize pilot First Lieutenant Donald Wilson Hurlburt, who died in an airplane crash on the main base in October 1943 (Figure 1-4).

The facility had the distinction of being the only auxiliary field on Eglin developed with a full-scale permanent cantonment (Weitze 2001:7), and was used throughout World War II for various testing and training exercises, including the use of the field by the Electronics Division of the Proving Ground Command and by Lieutenant Colonel Jimmy Doolittle and his Raiders. Beginning in 1945, the 1st Experimental Guided Missiles Group was temporarily based at Hurlburt Field, and used the facility to support various missile testing programs, including the testing of the JB-2 missile on Santa Rosa Island and Operation Sandstone. In 1949, the 1st Experimental Guided Missiles Group was deactivated, and plans were made by the Air Force to use Hurlburt Field as a training school for fighter-bomber combat crews. The last Kuljian DC hangar was constructed on Hurlburt in 1951 to accommodate these plans (Weitze 2001:103), but, instead, changes in the mission strategy led the Air Force to reactivate the field in 1955 for use by the 17th Light Bombardment Wing (17 LBW).

As part of the reactivation, the Air Force made various improvements to the base, including the expansion of the airstrip and the construction of family housing units. The 17 LBW used the base for the testing of various aircraft, including the Martin B-57 Canberra, the Lockheed T-33 Shooting Star, and the B-66 bomber, before succeeding it to the 4751st Air Defense Missile Wing (4751 MW) in 1958.

During the late 1950s and early 1960s, the 4751 MW used the ranges on Okaloosa Island to successfully test BOMARC surface-to-air missiles. However, by 1962, mission changes and the phase-out of the BOMARC missile led the Air Force to downgrade the 4751 MW to a squadron, and to establish the 4400th Combat Crew Training Group as the host unit at Hurlburt Field.

The 4400th Combat Crew Training Group was initially activated as a squadron at Hurlburt in April 1961, and quickly grew to become the 1st Air Commando Wing in 1963 and finally the 1st Special Operations Wing in 1968¹. Originally known by the name “Jungle Jim”, the wing specialized in counter-insurgency and military assistance capabilities, and played a crucial role in the Vietnam War and subsequent aid, rescue, and support operations during the 1980s and 1990s.

Currently, Hurlburt Field is home to the 1st Special Operations Wing (1 SOW) and the Headquarters Air Force Special Operations Command (AFSOC), and hosts thirty-four partner units from six major commands. The mission of the 1 SOW is to rapidly plan and execute specialized and contingency operations using close air support, precision aerospace firepower, specialized aerospace mobility, agile combat support, and intelligence, surveillance and reconnaissance (ISR) operations (Hurlburt Field website).

¹ In October 1993 the 1 SOW was renamed the 16 SOW, but changed back to the 1 SOW in 2006.

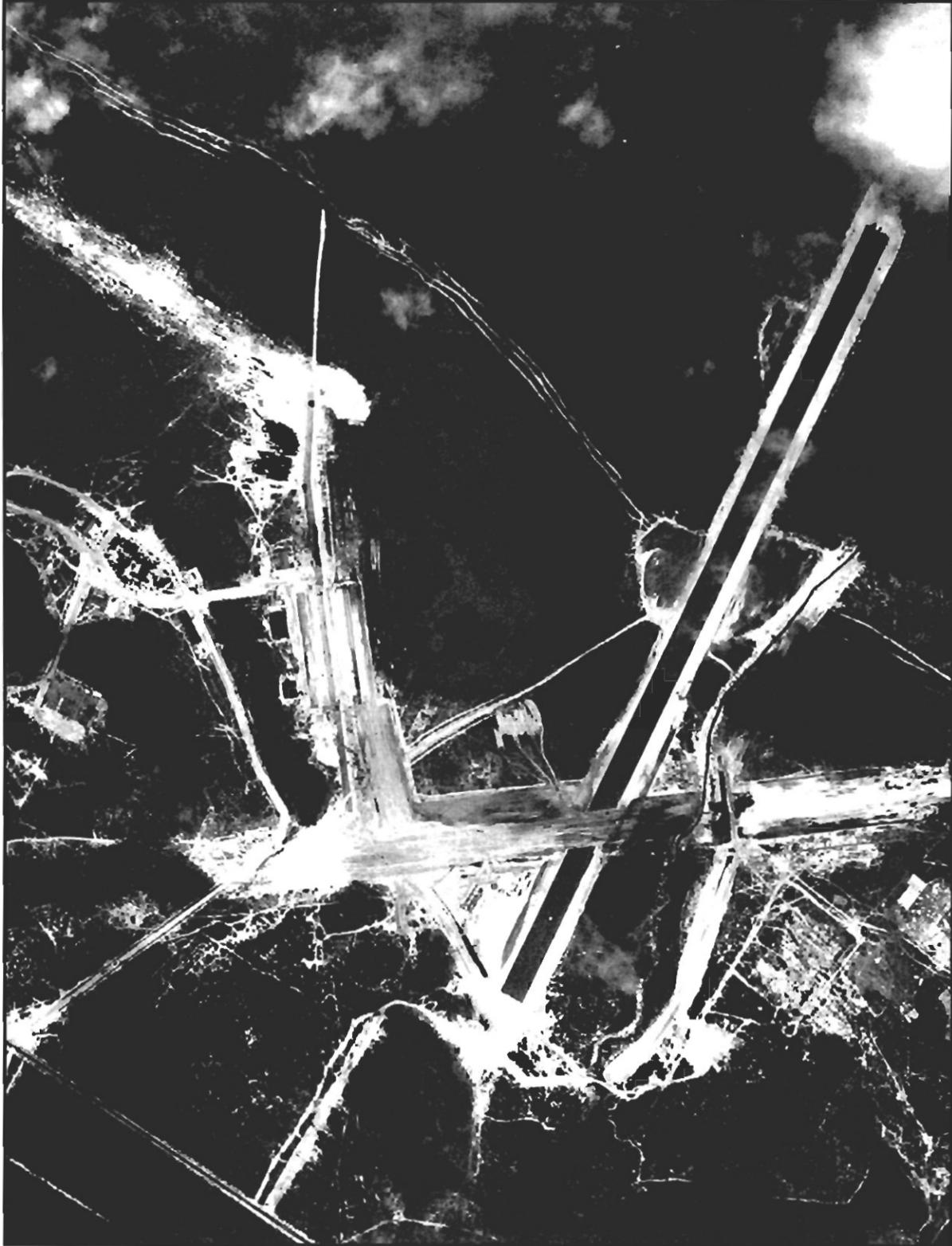


Figure 1-4: Auxiliary Field 9 (Hurlburt Field) ca. 1944 (Weitze 2001:15).

These unique abilities have been deployed since 2001 in support of the global war on terrorism and during the Operations ENDURING FREEDOM and IRAQI FREEDOM. As the host unit of Hurlburt Field, the 1 SOW is responsible for the management and preservation of the cultural resources located on the base. Since 1995, these duties have been handled by the Environmental Element Chief and a contracted program manager associated with the 1st Special Operations Civil Engineer Squadron of the 1st Special Operations Mission Support Group (1 SOMSG). Prior to 1995, Hurlburt Field's cultural resources were managed by the cultural resources management office of Eglin Air Force Base.

1.3 ICRMP mission and organization

The purpose of the integrated cultural resources management plan (ICRMP) is to provide strategies and guidance for managing the cultural resources of Hurlburt Field while efficiently supporting and enabling the missions of the host and tenant units. The ICRMP is a document required for all military installations having cultural resources (DoD Instruction 4715.3.4.3.3). Air Force Instruction 32-7065.4.10 further refines this mandate, and requires all Air Force installations to update their ICRMPs every five years.

The 2014 update of the Hurlburt Field ICRMP is divided into the following chapters:

Chapter 1: Purpose, Location, and Setting

- *Describes the base's location, and its natural and physical setting.*
- *Provides a brief description of the installation's mission and history.*
- *Presents the structure and purpose of the ICRMP*

Chapter 2: The Cultural Resources Management Program

- *Defines the mission and objectives of the Hurlburt Field Cultural Resources Management Program (CRMP)*
- *Describes the goals and objectives of the last ICRMP and how they were met by the program*
- *Defines the goals and objectives of the program for the next five years*

Chapter 3: Compliance Procedures

- *Describes the Section 106 process and the integration of the process with other compliance procedures.*
- *Presents the procedures for the inadvertent discovery of archaeological materials and NAGPRA remains and items*

- *Discusses the requirements of ARPA and the CLEP*
- *Identifies consulting parties and describes the consultation process*

Standard Operating Procedures

Describes the procedures for the following actions:

SOP 1 Eglin AFB Consultation

SOP 2 Native American Consultation

SOP 3 Inadvertent Discoveries

SOP 4 ARPA Enforcement

SOP 5 Compliance Procedures for Declared Emergencies and Disasters

SOP 6 Compliance Procedures for Undeclared Emergencies and Disasters

References and Appendices

Provides data, documents, and references for the CRMP and other stakeholders

Bibliography

Appendix A Relevant Legislation and Regulations

Appendix B Agreement Documents

Appendix C Contact Information for Consulting Parties

Appendix D Stakeholder Roles and Responsibilities

Appendix E The Five Year Plan

Appendix F Site Monitoring

On the attached CD:

Appendix G Curation Procedures and Inventory

Appendix H Historic Context

Appendix I Resource Inventory Forms and Descriptions

Appendix J Resource Maps

Appendix K Management Plans

2 The Cultural Resources Management Program

2.1 Roles and Responsibilities

Cultural resources are defined as an object or location that conveys the shared beliefs, lifeways, customs, behaviors, or values of a specific people, community, or culture. Inventory, preservation, and management of these resources on federal lands is required by numerous laws, guidelines, and military instructions (refer to Appendix A and Chapter 3 for additional discussion). Specifically, DoDI 4715.16 Enclosure 3 requires each DoD installation or activity to use a cultural resources management approach that includes:

- Assessment of the military mission
- Preparation of detailed inventories of cultural resources
- Analysis and assessment of risks to cultural resources
- Preparation of management plans
- Implementation of management plans
- Monitoring and assessment of the results
- Completion of a needs-assessment survey
- Maintenance of the currency of the inventories
- Re-analysis and reassessment of the risks to cultural resources
- Adjustments to the overall program, as necessary

The main responsibilities of the Hurlburt Field Cultural Resources Management Program (CRMP) are to execute this approach, and to ensure the integration of this process into the internal procedures and plans of the base. In order to accomplish these tasks, AFI 32-7065 1.4.10.1-9 requires Air Force cultural resources management programs to fulfill the following objectives:

- | | |
|-------------------------------------|--|
| Inventory & Evaluation | <ul style="list-style-type: none">• <i>Locate, inventory, evaluate, and recommend properties for the NRHP</i>• <i>Identify objects of potential importance for Air Force history to USAFMS</i> |
| Management & Maintenance | <ul style="list-style-type: none">• <i>Develop, implement, and maintain an installation ICRMP</i>• <i>Develop and maintain a cultural resources management database.</i> |
| Compliance | <ul style="list-style-type: none">• <i>Ensure that all proposed actions that may affect cultural resources are identified early in the planning process and coordinated with appropriate regulatory authorities.</i> |

- Compliance**
- *Coordinate with installation personnel, the SHPO, THPOs, the Advisory Council, Indian Tribal representatives, and others to identify significant cultural resources, evaluate potential impacts, and reduce, avoid, or mitigate adverse effects.*
 - *Review all installation projects for compliance with laws, instructions, and regulations.*
 - *Monitor the work of contractors on the installation to ensure compliance with Air Force cultural resources requirements*
 - *Conduct public awareness and education programs*

This chapter describes how the Hurlburt Field CRMP is fulfilling these objectives, and provides strategies and goals for meeting these needs over the next five years.

2.2 Identifying and Evaluating Cultural Resources

Cultural resources encompass a wide range of objects and locations of importance to a diverse assortment of people. Laws which protect cultural resources refer to them using various terms, depending on which type of cultural resource the law addresses. These terms include historic properties (NHPA), cultural items (NAGPRA), archaeological resources (ARPA), and sacred sites (EO 13007).

At the heart of the cultural resources management process is the need to identify these resources, and determine their importance. For most resources, evaluating their importance is determined by their eligibility for listing on the National Register of Historic Places (NRHP).

2.2.1 The National Register of Historic Places and the Evaluation Process

The National Register of Historic Places was created by the passage of the National Historic Preservation Act in 1966, and was an expansion of the National Historic Landmark Program (Historic Sites Act of 1935) and the National Monuments Program (Antiquities Act of 1906).

According to the NHPA, cultural resources—referred to as historic resources or properties—eligible for listing on the NRHP are defined as “...any prehistoric or historic district, site, building, structure, or object...including artifacts, records, and material remains related to such a property or resource.” The terms *district*, *site*, *building*, *structure*, or *object* are further defined by 36 CFR 60.3 which states:

A **district** is a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united by past events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.

A **site** is the location of a significant event, a prehistoric or historic occupation or activity, or a building or structure, whether standing, ruined, or vanished, where the location itself maintains historical or archeological value regardless of the value of any existing structure.

A **building** is a structure created to shelter any form of human activity, such as a house, barn, church, hotel, or similar structure. Building may refer to a historically related complex such as a courthouse and jail or a house and barn.

A **structure** is a work made up of interdependent and interrelated parts in a definite pattern of organization. Constructed by man, it is often an engineering project large in scale.

An **object** is a material thing of functional, aesthetic, cultural, historical or scientific value that may be, by nature or design, movable yet related to a specific setting or environment.

Section 110 of the NHPA requires all federal land managers to inventory and maintain records about the historic resources located on their lands. Archaeological and architectural surveys, predictive models, oral history interviews, documentary research, and consultations are used by land managers to identify these resources and to evaluate their management needs.

Any resources identified by these methods are evaluated for listing on the NRHP based on their association with important historical events or people, their ability to convey information about the past, or for conveying characteristics of a particular architectural style, class, or school. The resources must also retain integrity of location, design, setting, materials, workmanship, feeling, and association in order to be considered eligible for listing.

Sometimes eligibility cannot be determined at the Phase I inventory level. If this is the case, then additional work is required to evaluate the resource. Cultural resource professionals often refer to this additional work as a “Phase II” investigation or an “evaluation” of the resource. If the resource is determined eligible for listing on the NRHP then protection from destructive and damaging activities is required by various laws.

If these activities cannot be avoided, either due to long-term actions (like erosion) or due to planned activities involving Federal monies, permits, or agencies (an *undertaking*, as defined by Section 106, NHPA), then additional documentation and investigation of the resource is required by the NHPA and the National Environmental Policy Act (NEPA) to mitigate these adverse effects (see Chapter 3). This additional work is often referred to by professionals as a “Phase III”, a “mitigation”, or a “data recovery”.

Failure to follow these procedures or to protect NRHP-eligible resources from adverse effects can lead to legal penalties ranging from monetary fines to incarceration. At the installation level, failure to comply with the various laws protecting cultural resources can halt or impede infrastructure development, military training, and mission support activities.

Readers are referred to Appendix A for a complete listing of the laws, regulations, executive orders, and instructions which protect cultural resources.

2.2.2 Identifying and Evaluating Archaeological Resources

As described above, historic resources are found and documented in a number of ways (see also 36 CFR 800.4 and 48 Federal Register 44716-44742). Archaeological sampling methods, which allow

installations to pinpoint areas where archaeological sites may be located, are permitted on large installations where comprehensive surveys would be time-consuming and expensive (AFI 32-7065.2.1.2.1).

The archaeological sampling strategy utilized by Hurlburt Field is a revised version of a predictive model created as a part of the Historic Preservation Plan (HPP) for Eglin AFB and Hurlburt Field (Thomas and Campbell 1993). The model was developed from ten years of context-building archaeological fieldwork conducted on both bases, and from historic land tract maps and documents which depict the location of former homesteads.

The model was broken down into areas consisting of a high, low, or indeterminate probability of encountering archaeological resources. Areas having a high probability of encountering prehistoric archaeological sites were determined by Thomas and Campbell (1993:214) to be areas located less than 15.24 meters above water and within 200 meters linear distance of water. The high probability zones for the historic sites were based on U.S. Forest Service and USGS quadrangle maps created during the early to mid-20th century, plat maps from the early to mid-19th century, the records of the Choctawhatchee National Forest, and archaeological fieldwork (Thomas and Campbell 1993:221). Indeterminate zones were wetland areas, such as swamps and floodplains, which could contain historic or prehistoric archaeological resources but were not tested during the creation of the HPP. All of the remaining areas on the bases were considered to have a low probability for archaeological remains, and did not require survey.

In 1994, two archaeologists from the Corp of Engineers, Mobile District, re-evaluated the proposed probability zones, and recommended shrinking the size of the high probability areas and removing the indeterminate zones from further assessment (U.S. Army Corps of Engineers 1995). No fieldwork was conducted as a part of this re-evaluation. The alterations to the model were based on the fieldwork conducted during the HPP, and Section 106 fieldwork conducted by the Corp of Engineers on the highly-disturbed base cantonment (U.S. Army Corps of Engineers: 1991-1994).

In 1994, the revised predictive model was submitted as a part of the Hurlburt ICRMP, and the SHPO concurred with these revisions. Since this concurrence, the model has not been tested for its accuracy, or modified to reflect the new data acquired by archaeological investigations conducted since 1994.

The static use of the model is an inherent problem with predictive models, which should grow and change as new data is acquired (Green et al. 2012:185). In the case of the Hurlburt Field predictive model, the lack of testing and modification has created temporal and geographic biases in the installation's resource inventory that have not been addressed by subsequent investigations.

The original Thomas and Campbell (1993) model was designed with a temporal bias to predict the location of two specific terrestrial site types: prehistoric Native American sites and late 19th-early 20th c. historic homestead sites. The model was not designed to predict the locations of sites associated with the Spanish and British occupations of West Florida, maritime or submerged resources of any age, or post-1930 historic sites, which includes aircraft wreck sites and sites associated with the military occupation and use of Hurlburt Field. The focus of the model on historic homestead claims also resulted

in the exclusion of archaeological sites created by marginalized ethnic and socio-economic groups, who often lived in less-than-desirable terrain and did not claim the land they lived upon. The 1995 revised model did not address any of these temporal biases, and actually probably made them worse by reducing the acreage that the base was required to archaeologically survey.

The revised model also contributed to the geographic bias of the inventory by exempting all indeterminate zones from needing additional work. None of the investigations conducted after the HPP, including the surveys conducted by the Corps of Engineers, have ever tested the wetland indeterminate or low probability zones. As a result, the accuracy of the model to predict the locations of archaeological resources is unproven.

A Legacy project discovered similar problems with other Air Force installations' predictive models, including the Eglin AFB predictive model, which was built off the same information as the original Hurlburt Field predictive model and used by the program in a similar fashion (Green et al 2012; Altschul et al 2004). Eglin AFB has addressed some of their model's deficiencies by surveying a sample of the indeterminate and low probability zones located on the base, and updating their model to reflect the data accumulated by the program over the past thirty years. A goal of this ICRMP is to conduct a similar testing program and update of the predictive model used by Hurlburt Field. The details of this goal are described below and in the five year plan in Appendix E

2.2.3 Identifying and Evaluating Architectural Resources

Architectural resources on Hurlburt Field are identified for evaluation to the NRHP by the Hurlburt CRM from the Real Property records maintained on the base. Resources considered eligible for evaluation are any building or structure 50 years or older in age, any Cold War resource built or used by the Air Force between 1946 and 1989, and any historic landscape or district (AFI 32-7065 2.1.5).

Although most resources must be fifty years of age or older to be considered for listing on the NRHP, exceptions are allowed for resources less than fifty years of age that are of outstanding importance to our nation's history (Criterion G). The Air Force Cultural Resources Management Playbook (Section 1.1.1) states that Cold War facilities associated with nuclear weapons (including nuclear weapons research and development laboratories, testing and proving grounds, manufacturing, storage and maintenance facilities), strategic or tactical air groups and operations, missile launches, and space exploration are examples of properties that should be evaluated for National Register eligibility under the military Cold War theme and Criteria Consideration G. Since most of the architectural resources on Hurlburt Field were built and used by a tactical air wing, the Hurlburt Field CRMP should refer to the Air Force Playbook for more information about resources eligible under Criterion G, and seek qualified professional assistance from the IST in identifying and evaluating these kinds of facilities.

The Air Force has developed a number of historic context statements for the identification and evaluation of architectural resources. The Hurlburt CRM should refer to these statements for assistance in recognizing architectural resources which require evaluation. These documents are available on the DENIX website (<http://www.denix.osd.mil/cr/HistoricBuildingsStructures/ConTextStudies.cfm>).

2.2.4 Identifying and Evaluating Historic Objects

AFI 32-7065 1.4.10.3 requires cultural resource management programs to identify to the USAFMS historic objects that may qualify for preservation and evaluation for the NRHP. No historic objects have been identified or evaluated on Hurlburt Field by the Hurlburt Field CRMP; however, it should be noted that any aircraft, missiles, weapons, or hardware currently on static display on the base are considered property of the USAFMS. As the property manager, USAFMS is responsible for evaluating and nominating these objects for the NRHP. Any undertakings which may affect these resources require consultation with the USAFMS, regardless of effect (AFI 32-7065 4.16.3).

2.2.5 Identifying and Evaluating Aircraft Crash Sites

AFI 32-7065 4.1 requires cultural resources management programs to document the location of aircraft wreck sites on the installation GIS, and to evaluate wreck sites older than 50 years of age for the NRHP. Identification and evaluation of aircraft wreck sites has not occurred on Hurlburt Field. In order to correct this deficiency, the inventory and evaluation of aircraft wreck sites is included as a goal of this ICRMP.

2.2.6 Identifying and Evaluating Submerged and Maritime Resources

The requirements of the NHPA to inventory and evaluate resources are not restricted to terrestrial historic properties and sites. Submerged and maritime resources must also be inventoried under the law, and evaluated for their importance.

In the State of Florida, all lands located below the mean high water mark are considered property of the state. This includes all islands, sandbars, shallow banks, and islands located in navigable waters or created by dredging. Since these lands are considered State property, they do not require evaluation by Hurlburt Field under Section 110. However, any Federal activities (i.e., military training) using or impacting these lands are considered undertakings, which require consultation with the SHPO and the completion of the Section 106 review process. The Hurlburt Field CRM should refer to the Historic Context in Appendix H, and Eglin AFB's historic context for maritime resources (Arbuthnot et al 2013) for assistance in identifying and evaluating underwater sites and structures.

2.2.7 Identifying and Evaluating Culturally or Historically Important Natural Resources

Natural resources can also be evaluated for the NRHP if they possess traditional or cultural importance for a particular people, culture, or community, or if they provide information about a historical activity or event. Examples of these types of resources could include plant or animal habitats that were ceremonially used by Native American Tribes, traditional Native American hunting or fishing grounds, or trees that were used in historic turpentine production. At this time, no natural resources have been identified as historic properties on Hurlburt Field. However, if this changes, the Hurlburt Field CRM should work closely with the Natural Resources Programs of Eglin AFB and Hurlburt Field to protect and maintain these properties. Information about any natural resources identified as NRHP-eligible

properties, and the procedures for maintaining and protecting them, should be included in the installation INRMP and other planning documents.

2.2.8 Identifying and Evaluating Traditional Cultural Properties (TCPs)

A traditional cultural property (TCP) is a property “...that is eligible for inclusion in the National Register because of its association with cultural practices or beliefs of a living community that (a) are rooted in that community's history, and (b) are important in maintaining the continuing cultural identity of the community”, (Parker and King 1998).

Hurlburt Field is required to consult with Native American Tribes, living communities, and local interest groups to identify TCPs. The Hurlburt Field CRMP should also consider working closely with the military community to identify TCPs that are associated with the Air Force culture. Examples of places or objects which may have important cultural and historical meaning to the military include parade grounds, veteran’s memorials, and air show locations.

At this time, no TCPs have been identified on Hurlburt Field, but the CRMP is encouraged to continually seek information to identify these resources. If a TCP is identified, the location of the site must be treated as confidential information, and arrangements should be made with the affiliated group for access to the TCP, as required.

2.2.9 Identifying and Evaluating Native American Indian Sacred Sites

Executive Order 13007 requires Federal land managers to identify, protect, and allow Native Americans access to sacred sites located on Federal property. A Sacred site is defined as

“...any specific, discrete, narrowly delineated location on Federal land that is identified by an Indian tribe, or Indian individual determined to be an appropriately authoritative representative of an Indian religion, as sacred by virtue of its established religious significance to, or ceremonial use by, an Indian religion; provided that the tribe or appropriately authoritative representative of an Indian religion has informed the agency of the existence of such a site.” (EO 13007 1.1.iii)

No sacred sites have been identified on Hurlburt Field. However, the base is encouraged to consult with Native American Tribes to identify and protect any sacred sites possibly located on the base. If a sacred site is identified by the Tribes, the location of the site must be treated as confidential information, and arrangements should be made with the affiliated group for access to the site, as required.

The Hurlburt Field CRM should also take into consideration that sacred sites may not be evaluated for or meet the requirements of the NRHP, but may still require protection and consideration under EO 13007. Development of good working relationships and continuous consultation with the affiliated Native American Tribes is important to ensure that these culturally significant resources are identified and managed in an appropriate manner.

2.2.10 Identifying and Evaluating Historic Cemeteries and Graves

Historic cemeteries are generally not considered eligible for nomination to the NRHP, with a few exceptions (Potter and Boland 1992). However, State of Florida statutes (FS 872.02) and the Archaeological Resources Protection Act (ARPA; 16 U.S.C. 470ee) require protection of cemeteries and burial sites from vandalism and desecration.

Two historic cemeteries have been identified on the base, which require protection and management under these laws. Cemetery 26, consisting of three graves, is reportedly located in the NE $\frac{1}{4}$ of Section 13, Township 2 South, Range 25 West near the northern family housing area. Prentice Thomas and Associates surveyed this area during the HPP (Thomas and Campbell 1993), and found a government-produced sign for the cemetery but they did not relocate any graves. They also noted that there were disparities in the legal description of the cemetery size and location between the various documents they reviewed, which placed the proposed location of the cemetery in doubt (1993:Vol 2, 34). In 2004, PTA conducted a survey of the cemetery with ground penetrating radar (GPR; Thomas et al. 2005). No graves were found during this investigation either, which led PTA to suggest that the cemetery had been destroyed by the construction of the housing development (2005:328).

Informants, the HPP research, and deed records, however, suggest that the cemetery is actually located in a different part of the base. According to the Eglin AFB real property records, the cemetery property was purchased from J. Henry Krause in 1939. However, the General Land Office (GLO) records show Krause only owning property in the southwest and southeast quadrants of Section 13, Township 2 South, Range 25 West. If these records are correct then Cemetery 26 is actually located near the mapped location of the second documented cemetery on the base, which is shown on the maps in the SW $\frac{1}{4}$ of Section 13, Township 2 South, Range 25 West.

This second cemetery also lies within the boundaries of 8OK061, but the cemetery has not been archaeologically recorded or investigated even though historic artifacts and features have been observed at the site. Local folklore suggests that this is a pet cemetery that was used by the residents of the military family housing area during the mid-20th century, but given the confusion with the Krause records, additional research is needed to determine if this may also be the location of the three graves attributed to Cemetery 26.

Since the pet cemetery may actually contain human graves, it is recommended that ground disturbing activities be avoided in this area until the boundaries and management needs of the cemetery can be established through historic document research and geophysical testing. This research should also determine if there are two or one historic cemeteries located on the base by investigating the previously-investigated location of Cemetery 26. Investigation of the pet cemetery should be considered a priority item and is listed as a goal of this ICRMP.

2.2.11 Identifying and Evaluating Historic Districts

Currently, no districts are located on Hurlburt Field. The archaeological and architectural inventories of the base should be reviewed to determine if any districts are warranted.

2.2.12 Summary of Investigations and the Inventory

Thirty-three archaeological and architectural investigations have been conducted on Hurlburt Field property to find and evaluate historic properties. Table 2-1 and Table 2-2, below, provide a description of these investigations. Each investigation is classified as either “Section 106” for investigations conducted for Section 106 compliance purposes (see Chapter 3), or “Section 110” for investigations conducted for Section 110 inventory purposes. Investigations without a classification were either conducted before the construction of the base, or were conducted for research purposes.

As a result of these investigations, fifty architectural properties and eighteen archaeological sites have been identified and evaluated for the NRHP (Appendix I). Of these evaluated resources, only five archaeological sites are considered eligible for the NRHP, and three archaeological sites are considered potentially eligible for the NRHP.

Appendix I contains the state site forms for these resources and provides a detailed description of the investigations and inventory located on Hurlburt Field. Appendix J contains maps showing the investigation and resource locations. The information in these appendices was compiled from the records held at the SHPO, Eglin AFB, and Hurlburt Field.

A review of this information shows several discrepancies between the various sources in the recorded NRHP eligibility status of the sites (Appendix I). In addition, at least one report (Mallory and Campbell 2003) and associated site form (80k2146) may not have been submitted to the SHPO for concurrence since neither document appears in their files. It is recommended, as a goal of this ICRMP, that the Hurlburt Field CRM work with the SHPO to correct these discrepancies. Revision, as needed, of Appendices I and J is also a requirement of the annual ICRMP update.

Table 2-1: Archaeological Investigations

| FL SHPO Survey Num | Year | Type | Author | Title | Results |
|---------------------------|-------------|-------------|--|--|---|
| | 1901 | | Moore, C.B. | <i>Certain Aboriginal Remains of the Northwest Florida Coast, Part I</i> | Recorded 8OK5 |
| | 1949 | | Willey, Gordon R. | <i>Archaeology of the Florida Gulf Coast</i> | Recorded 8OK5 |
| | 1957-1979 | Sect 110 | Lazarus, W.C. | <i>Recordation of 8OK5, 8OK61, 8OK126, & 8OK133</i> | No report; site forms only |
| 507 | 1979 | Sect 106 | L. Ross Morrell & Louis Tesar | <i>Cultural Resources Assessment Request, Proposed 115 KV Transmission Line, Eglin Air Force Base</i> | No cultural resources recorded; 2 miles surveyed on Eglin & Hurlburt. |
| 508 | 1980 | Sect 106 | Louis D. Tesar | <i>Cultural Resources Assessment Request, Proposed Road Construction: Route B and Route D, Eglin Air Force Base</i> | No cultural resources recorded; 2.2 miles surveyed on and off base. |
| 2287 | 1983 | Sect 110 | New World Research | <i>Management summary, Phase I Cultural Resources Survey, Eglin Air Force Base, Florida</i> | Summary of the fieldwork for the HPP (see below) |
| 2291 | 1984 | Sect 110 | New World Research | <i>Cultural Resources Investigations at Eglin Air Force Base, Santa Rosa, Okaloosa, and Walton Counties, Florida</i> | Interim report regarding work for the HPP (see below) |
| 1389 | 1985 | Sect 106 | Dorothy H. Gibbens & Jerry Nielsen, U.S. Army Corps of Engineers, Mobile | <i>Culture Resources Survey of Selected Portions of Seven Parcels of Land, Eglin Air Force Base</i> | Only parcel 4 lies on Hurlburt (257 ac); no cultural resources recorded |
| No number; not on file | 1987 | | Gregory A. Mikell, New World Research, Inc. | <i>Cultural Resources Survey of a Portion of Hurlburt Field, Okaloosa County, Florida</i> | No cultural resources recorded; Part of HPP work (see below) |
| No number; not on file | 1988 | Sect 106 | Wilfred M. Husted, NPS-Atlanta, GA | <i>A Cultural Resources Survey of Five Small Project Areas at Hurlburt Field, Okaloosa County, Florida</i> | 8OK503 recorded; evaluated as destroyed/not eligible |
| 3320 | 1991 | Sect 106 | U.S. Army Corps of Engineers, Mobile District | <i>Cultural Resources Survey of a Proposed M60 Machine Gun Range, Hurlburt Field,</i> | 48.6 ac. surveyed; no resources recorded |

Table 2-1: Archaeological Investigations

| FL SHPO Survey Num | Year | Type | Author | Title | Results |
|---------------------------|-------------|-------------|---|--|---|
| | | | | <i>Mary Esther, Florida</i> | |
| 3285 | 1992 | Sect 106 | U.S. Army Corps of Engineers, Mobile District | <i>A Cultural Resources Survey of a Proposed Special Tactics Squadron Facility, Hurlburt Field, Mary Esther, Florida</i> | 2 ac surveyed; no cultural resources recorded |
| No number; not on file | 1992 | | Gregory Mikell | <i>8OK5: A Coastal Weeden Island Village in Northwestern Florida</i> | No report; <i>Florida Anthropologist</i> article |
| 4017 | 1993 | Sect 110 | Prentice Thomas & L. Janice Campbell, New World Research, Inc. | <i>Eglin Air Force Base, Historic Preservation Plan</i> | 1181.1 acres surveyed; eight sites & one cemetery investigated (8OK005, 8OK061, 8OK126, 8OK133, 8OK168, 8OK309, 8OK380, 8OK474, Cem 26) |
| 3754 | 1993 | Sect 106 | Marion Almy, Lee Hutchinson-Neff, Sharyn Thompson, & Mary Louis Ellis; Archaeological Consultants, Inc. | <i>A Cultural Resource Assessment Survey of SR 30/US 98 from One-Half Mile West of the Hurlburt Field Entrance to SR 85, Okaloosa County, Florida</i> | Two new resources (8OK872 & 8OK873) recorded within Hurlburt boundaries; both not eligible; only a portion of 6.2 mi survey falls on Hurlburt property. |
| 4175 | 1993 | Sect 106 | U.S. Army Corps of Engineers, Mobile District | <i>Historic Resource Surveys of the East Side Development Hurlburt Field, U.S. Air Force, Okaloosa County, Florida</i> | 77.5 ac. surveyed; no resources recorded |
| No number; not on file | 1993 | | Gregory Mikell | <i>8OK5 Revisited: 1992 Excavations</i> | No report; <i>Florida Anthropologist</i> article |
| 5273 | 1994 | Sect 106 | U.S. Army Corps of Engineers, Mobile District | <i>Historic Resources Survey of the Munitions Maintenance Facility, Storm Water Drainage System Upgrade, and Active Work Areas, Hurlburt Field, U.S. Air Force, Okaloosa County, Florida</i> | No resources recorded; 8 mi pedestrian surveyed; 33.57 ac of pond construction pedestrian surveyed; 61 auger tests excavated |
| No | 1995 | Sect | U.S. Army Corps of Engineers, | <i>Archaeological Sensitivity Map, Hurlburt</i> | Management project to revise |

Table 2-1: Archaeological Investigations

| FL SHPO Survey Num | Year | Type | Author | Title | Results |
|---------------------------|-------------|-------------|--|--|---|
| number; not on file | | 110 | Mobile District | <i>Field, U.S. Air Force, Okaloosa County, Florida</i> | predictive model; no fieldwork. |
| 4617 | 1996 | Sect 106 | J. Cinder Griffin Miller, Melissa Braud, Ralph Draughton, Jr., Julian Granberry, Frank Vento, Science Kilner, Michele Williams, & Mary Rather; R. Christopher Goodwin & Associates, Inc. | <i>Phase I Cultural Resources Survey of State Road No. 30 (US 98) from the End of the Pensacola Bay Bridge to Hurlburt Field Entrance, Santa Rosa and Okaloosa Counties, Florida</i> | No resources identified within Hurlburt boundaries; 1.6 mi surveyed on Hurlburt. |
| 5081 | 1997 | | Todd McMakin, Brockington & Associates, Inc. | <i>Phase II Archaeological Testing of 8OK61 Hurlburt Field, Florida</i> | Site evaluation; determined 8OK61 as eligible for NRHP listing |
| 18581 | 1997 | Sect 106 | Daniel T. Penton, PBS&J | <i>Cultural Resources Assessment of a Segment of State Road 30 (US 98), From West of Josie Road to East of Santa Rosa Boulevard in Fort Walton Beach</i> | No resources identified or surveyed on Hurlburt; 7.5 mi total, 1.6 mi on base. |
| 9668 | 2003 | Sect 106 | William R. Mallory & L. Janice Campbell, Prentice Thomas & Associates, Inc. | <i>Survey of X-679, Cultural Resources Investigations, Eglin Air Force Base, Okaloosa, Santa Rosa, and Walton Counties, Florida</i> | 834 ac surveyed; two new sites (8OK2138 & 8OK2139) recorded; 8OK2139 not eligible, 8OK2138 potentially eligible |
| No number; not on file | 2003 | Sect 106 | William R. Mallory and L. Janice Campbell, Prentice Thomas & Associates, Inc. | <i>Survey of X-687, Cultural Resource Investigations, Hurlburt Field, Okaloosa County, Florida</i> | 346 ac surveyed; one new site (8OK2146) recorded as not eligible. |
| 9558 | 2003 | Sect 106 | Caleb Curren, Steve Newby, & Michael Allen, Archaeology, Inc. | <i>Phase I Cultural Resource Investigations along the Hurlburt Interchange Construction Corridor, Okaloosa County, Florida</i> | 99.4 ac surveyed; one isolated find recorded |
| 14628 | 2007 | Sect 106 | William Mallory & L. Janice Campbell; Prentice Thomas & Associates, Inc. | <i>Cultural Resources Survey of X-911, Cultural Resources Management Support, Eglin Air Force Base, Okaloosa, Santa Rosa, and Walton Counties, FL</i> | 70 ac.; no cultural resources recorded |

Table 2-1: Archaeological Investigations

| FL SHPO Survey Num | Year | Type | Author | Title | Results |
|---------------------------|-------------|-------------|--|--|---|
| | 2010 | Sect 106 | L. Janice Campbell, Erica Meyer, Christina M. Callisto, & Brian H. Schultz; Prentice Thomas & Associates, Inc. | <i>Cultural Resources Survey of X-1083 (Task Order CR-10-0041), Contract #W9128F-07-02-0001, Cultural Resources Management Support, Eglin Air Force Base, Okaloosa County, Florida</i> | 253 ac (on Eglin); one new site (8OK2809) extending into Hurlburt Field identified as potentially eligible. |
| | 2012 | Sect 106 | Erica Meyer & Benjamin Aubuchon | <i>Summary of Monitoring at 8OK125: A Volunteer Effort Conducted in Support of Hurlburt Field Cultural Resources, Okaloosa County, Florida</i> | No eligibility determinations; project was to mitigate adverse effects to 8OK126 |
| | 2014 | Sect 106 | SEARCH, Inc. | Evaluation of 8OK2138 and 8OK2809 | In progress |

Table 2-2: Architectural Investigations

| FL SHPO Survey Num | Year | Type | Author | Title | Results |
|---------------------------|-------------|-------------|---|--|---|
| 8932 | 1995 | Sect 110 | Prentice Thomas & Associates, Inc. & Historic Properties Services | <i>Architectural Reconnaissance Survey of Hurlburt Field, Okaloosa County, Florida</i> | Six buildings evaluated; all not eligible for the NRHP |
| 10664 | 2004 | Sect 110 | M & P Services International Corporation & Webb & Associates | <i>Draft Inventory of Historic Properties FY 2004</i> | Thirty-six buildings evaluated; all not eligible for the NRHP |
| | 2005 | Sect 106 | Prentice Thomas & Associates, Inc. | <i>Multiple Cultural Resources Investigations for Architect-Engineering (A-E) Services for Cultural Resources Work in Support of the Lease, Demolition, and Construction of Military Family Housing for Eglin AFB and Hurlburt Field, FL</i> | Cem 26; cemetery was not located and presumed destroyed |
| | 2006 | Sect 110 | e ² M, Inc. | <i>Hurlburt Field Integrated Cultural Resources Management Plan, Appendix B</i> | Eight resources evaluated not eligible |

2.2.13 Nominating Resources to the NRHP

AFI 32-7065.2.5.3 encourages installations to nominate properties to the NRHP if they intend to interpret, commemorate, or actively manage the resource as historically significant and the resource is accessible to the base community and/or general public. To nominate a property or properties to the NRHP, the installation must do the following:

1. The Hurlburt CRM develops and submits a proposed nomination package to the AFCEC CR SME for review.
2. Once the proposed nomination is approved by AFCEC CR SME, the Hurlburt CRM submits the nomination for review by the installation internal stakeholders. Stakeholders can include, but are not limited to, the Real Property Officer (RPO), the Installation Commander, building managers, and the Natural Resource Manager (NRM).
3. The CRM seeks funding for the nomination package through the PPBE process. If funding is available, the CRM and IST finalize the package.
4. The finalized package is sent to the SHPO for approval and signature.
5. The SHPO-signed package is then submitted to the installation commander for signature. The signed package is then submitted through channels to the Air Force FPO.
6. The Air Force FPO signs the package and submits it to the Keeper of the NRHP, who decides if the nominated property meets the criteria for the Register.

Resources can be removed from the NRHP, after listing, if they no longer meet the criteria for the Register, in accordance with 36 CFR 60.15. The request for removal follows the same procedure as the nomination request.

No resources on Hurlburt Field have been nominated to the NRHP; however, five resources are considered eligible for listing. A multiple property nomination package was created for these resources in the late 1990s by Brockington and Associates. The package was submitted to the SHPO for approval, but was rejected for not including a map showing the proposed archaeological district. If the Hurlburt Field CRMP would like to reconsider nomination of these properties, the previous package could be easily revised to meet the requirements of the SHPO and Air Force. The Hurlburt Field CRMP should also work with the SHPO and IST to establish an archaeological district around these sites before re-submitting the nomination package.

2.2.14 Inventory and Evaluation Needs

A review of the current resource inventory has identified several inventory and evaluation goals for the Hurlburt Field CRMP to achieve in the next five years. The recommended goals are explained below:

2.2.14.1 Test and correct the predictive model

- Identify and evaluate aircraft wreck sites
- Identify and evaluate historic resources

- Survey a sample of the indeterminate and low probability zones
- Update and modify the model to reflect the new data; conduct additional survey as determined by the model or request concurrence with completed inventory requirements.

As described above, the predictive model for the archaeological sites has been used and modified without testing since its creation in the 1980s. One of the main goals for the next five years is to test the model, and to correct the biases in the inventory created by its use. This testing should include archaeological testing of a select sample of the indeterminate and low probability zones to test the accuracy of the predictive model. Sample testing of the wetland areas can be accomplished using LiDAR, which has proven successful in recent years for identifying elevated areas in swampland which may contain archaeological sites (Carlton and Altes 2013, 2014). Background research and surveys should also be conducted to identify early historic sites, sites associated with the historic African-American and Native American use of the area, and aircraft crash sites. The historic context in Appendix H can be used as a starting point for this background research and survey development.

2.2.14.2 Identify and Evaluate the Architectural Resources

- Complete the survey and evaluation of the buildings 50 years or older
- Identify and evaluate Cold War resources
- Review the inventory for districts, landscapes, and thematic groups, and evaluate as needed

Previous evaluations of the architectural inventory on Hurlburt Field have focused on individually evaluating buildings as they turn fifty years of age. Although this is a legitimate method for identifying buildings that require NRHP evaluation, it does create bias in the inventory by filtering the results towards answering one question: does the fifty year old building qualify individually for the NRHP? As a result, other architectural resource types (i.e., districts, landscapes) and Cold War resources, which may be eligible for the NRHP, are not taken into consideration.

Future investigations should evaluate not just the integrity and style of the individual buildings, but the context of the buildings—how they were used and by whom, where they are situated within the base, what structures or built features are associated with the building, and how does the resource add to the look and feel of the historic landscape and the built environment.

Consideration should also be given to inventorying Cold War period resources that may not be fifty years of age on Hurlburt Field. Most of the base was built in response to various testing and training programs created and conducted by a tactical air wing to combat the Cold War. The current evaluated inventory (all of which are considered not eligible for the NRHP), seems to underestimate the importance of the 1 SOW's mission in Vietnam and the mission of the other units who lived and trained at Hurlburt Field during the Cold War.

2.2.14.3 Other Inventory and Evaluation Needs

Additional inventory and evaluation goals for the Hurlburt Field CRMP are as follows:

- Evaluate 8OK2809 to determine NRHP eligibility status.
- Submit an archaeological district form for the five NRHP-eligible sites (8OK05, 8OK61, 8OK126, 8OK133, and 8OK380) and the one NRHP potentially eligible site (8OK1301) on Santa Rosa Sound; consider NRHP nomination of the district.
- Conduct research and a geophysical survey of the Hurlburt Field Pet Cemetery.
- Consult with the Native American Tribes, the local community, interest groups, and the civilian public to identify TCPs and Sacred Sites.
- Identify historic objects for the USAFMS.
- Correct the discrepancies in the inventory's NRHP eligibility status between the SHPO and Hurlburt Field records; share this corrected information with Eglin AFB.
- Submit the report for X-687 to the SHPO for concurrence, and submit the state site form for 8OK2146 and 8OK2138.

2.3 Managing and Maintaining the Inventory

The Hurlburt Field CRMP is responsible for managing and maintaining the cultural resources inventory after the resources have been identified and evaluated. This responsibility requires the CRMP to manage and maintain the data about the resources and investigations conducted on the base, to properly curate the documents and collections associated with the resources, to develop planning documents and strategies for meeting inventory and mission needs, to identify and request funding for inventory and management needs, and to assist the Air Force in their inventory and recording requirements.

2.3.1 Develop and Maintain Data Management Tools

Information about Hurlburt Field's historic resources, their eligibility status, and the investigations to identify and evaluate them is maintained by the Hurlburt Field cultural resources manager in GIS shapefiles and metadata, which meet Air Force standards for geographic information data.

The Hurlburt Field CRM also uses and assists with the update of the Real Property Records (RPR), which track the NRHP eligibility, condition, and age of the buildings and structures on base. The NRHP eligibility status codes for the RPR, as described in the DoD Real Property Guide and DoDI 4165.14, are as follows:

| | |
|-------------|---|
| NEV | Not evaluated |
| NHLI | Individually listed National Historic Landmark |
| NHLC | Contributing element to a National Historic Landmark district |
| NRLI | Individually listed on the National Register of Historic Places |
| NRLC | Contributing to a listed NRHP district |

| | |
|-------------|---|
| NREI | Individually eligible for the NRHP |
| NREC | Contributing to a district eligible for the NRHP |
| ELPA | Eligible for the NRHP for the purposes of a program alternative |
| DNE | Determined not eligible |
| DNR | NRHP/ NHL property, designation rescinded |
| NCE | Non-contributing element of a NHL/NRL/NRE district |

The creation and use of a relational database or geodatabase could assist the Hurlburt Field CRMP with its data management responsibilities by allowing the CRM to track site monitoring data, Section 106 compliance documents, consultation records, as well as, the resource inventory data and documents. The Hurlburt Field CRMP should consider creation of such a database, and may wish to adopt the template currently used by Tyndall AFB and Eglin AFB. The use of the same database would allow the three bases to share information easily, and would create a data standard for the Air Force bases controlled by the regional IST.

The IST has granted permission for Eglin to share with Hurlburt its relational database which contains data, maps and other detailed information about the archaeological sites, historic properties, sacred sites, or TCPs located on Hurlburt Field and are considered confidential information, in accordance with ARPA (16 U.S.C. 470hh), NHPA (16 U.S.C. 470w-3), EO 13007, and AFI 32-7065.4.4. As such, Appendices I and J, which contain information about the resource inventory, should not be included in the copies of this ICRMP released for public use and review. Access permissions and sharing capabilities are currently being worked out with Eglin AFB.

Consultation with the Office of the Staff Judge Advocate is recommended prior to the public sharing or release of any information about the historic resources, traditional cultural properties, or Native American Indian Sacred Sites located on Hurlburt Field (AFI 32-7065 4.4.1-3).

Properly Curate the Archaeological Collections and Documents

36 CFR 79 requires Federal installations to properly curate all archaeological collections and associated documents in a facility that meets or exceeds the guidelines' standards. Hurlburt Field currently curates most of their documents and archaeological collections in curation facilities located on Eglin Air Force Base and at Moundville Archaeological Park in Alabama (Appendix G).

Prior to the creation of the Hurlburt Field CRMP in 1995, all archaeological collections and documents from the installation's sites were considered property of Eglin AFB and were curated by their program and facility. Artifacts recovered by C.B. Moore and Gordon Willey, before the construction of the base, are curated at the Smithsonian Institute. The current locations of the collections recovered by Archaeological Consultants, Inc. at 8OK872 and 8OK873; by Wilfred Husted at 8OK503; and the isolated

find collected by Archaeology, Inc. are unknown. The Hurlburt Field CRM should attempt to locate these missing collections and have them returned to the base for curation, as they are still considered Federal property belonging to Hurlburt Field.

Collections and records curated by the Eglin and Moundville facilities must be prepared, cataloged, packaged, and labeled in a manner that fulfills the requirements of 36 CFR 79 and the standards of the repository. A MOU is in coordination for signature which will make the Eglin AFB facility the main repository for the Hurlburt Field collections and records. Future archaeological collections and documents should be prepared for curation based on the Eglin AFB repository's standards (included in Appendix G).

In addition to the proper curation of the collections, NAGPRA requires Federal land managers to identify and inventory all Native American human remains and associated funerary objects in their possession, and consult with the affiliated Native American Tribes to determine the appropriate repatriation measures for these cultural items and remains (NAGPRA). Hurlburt Field has consulted on the remains and cultural items recovered from two sites (8OK005 and 8OK126), and repatriated the items and remains to the state-recognized Florida Tribe of the Eastern Creek in 1994.

The tribe is not a Federally-recognized Tribe, and the NPS recommended that the Hurlburt Field CRMP retroactively publish in the Federal Register a notice of intent to repatriate in order to identify any Tribes who may wish to claim the remains (Hensley and Russo 1995:13-14). It is unknown if this retroactive posting occurred. The Florida Tribe of the Eastern Creek also desired to reinter the burials at the original site locations or at the San Destin site in Okaloosa County. It is unknown if and where this reburial occurred. The Hurlburt Field CRM and IST may wish to investigate this matter further to determine if the procedures for NAGPRA were completed, and where these remain and items are currently located.

Appendix G provides a more detailed description of the curated collections and documents of Hurlburt Field, and the repository standards to be used for cataloging and submitting collections for curation at the Eglin AFB facility. The Eglin AFB repository standards should be included in all future contracts for archaeological work to ensure that the materials and documents are collected, cataloged, packaged, and labeled in a manner that meets the requirements of the repository.

2.3.2 Develop, Maintain, and Implement an ICRMP

As described in Chapter 1, the ICRMP is designed to assist with the management of the cultural resources inventory on the base by recommending goals and objectives for the Hurlburt Field CRMP to achieve over the next five years. The previous 2007 ICRMP recommended the following goals and objectives:

- Comply with Federal laws and regulations governing the treatment of cultural resources while causing the least disturbance to the military mission

- Complete inventory and evaluation of cultural resources on Hurlburt Field and nominate, as appropriate, eligible resources to the NRHP.
- Develop efficient management procedures which streamline review under Section 106 of the NHPA
- Consult with federally-recognized Native American tribes and provide for protection and consideration of objects of cultural patrimony and sites of religious or cultural significance for Native Americans
- Enforce Federal laws which prohibit vandalism of cultural resources on Federal properties through law enforcement, monitoring, and increased public awareness
- Consider outside interests including those of local governments, public groups, and individuals, when making decisions related to the cultural resources at Hurlburt Field.
- Complete a memorandum of understanding (MOU) with Eglin AFB for curatorial services, and transfer the collections held at Moundville Archaeological Park to Eglin AFB.
- Conduct public outreach and awareness, including internal training and promotion of cultural resources preservation awareness.
- Implement avoidance and erosion stabilization of the five NRHP-eligible archaeological sites, and establish a site monitoring program to ensure site conditions remain stable.

Most of the 2007 ICRMP goals were met during the 2007-2012 period, and continue to be met by the Hurlburt Field CRMP staff. One objective that has not been completed was the creation and approval of a MOU between Eglin AFB and Hurlburt Field for the curation of Hurlburt Field's archaeological collections and documents, and the transfer of the collections from Moundville to Eglin AFB. The creation and approval of the MOU has been added as a goal to the current five year plan to be met by FY 2015. The transfer of the collections from the Moundville facility to Eglin AFB is not reiterated as a goal because the Hurlburt CRM feels the move is unnecessary. Eglin AFB is willing to accept this small collection if the Hurlburt CRM decides that the transfer is required in the future.

The five year plan for the current ICRMP is located in Appendix E. However, the primary objectives of the plan are repeated below:

- Ensure compliance with the Federal, State, and local laws and regulations regarding the protection and management of cultural resources.
- Ensure compliance with the Air Force and Department of Defense instructions regarding the protection and management of cultural resources.

- Identify, consult, and maintain relationships with the Florida State Historic Preservation Office (SHPO) and the Tribal Historic Preservation Offices (THPO) of the federally-recognized Native American Tribes with ancestral interests in the Hurlburt area.
- Identify and seek input from the general public, local interest groups, local governments and communities regarding undertakings that will adversely impact cultural resources on Hurlburt Field
- Provide educational opportunities and materials about the protection and management of cultural resources to the local community, the military community, and the public
- Maintain and update the inventories of the historic resources located on Hurlburt Field, and ensure that this information is submitted to and updated with the Florida SHPO.
- Budget funding for recurring and non-recurring costs, including salaries and training for the Hurlburt Field CRMP staff
- Monitor the condition of the archaeological sites, especially those eligible or potentially-eligible for the NRHP, and follow procedures for any identified ARPA violations
- Develop agreement documents and institute measures to streamline the Section 106 review process.

The five year plan should be updated annually to reflect the accomplishments and future needs of the program.

2.3.3 Identify, Budget, and Request Funding for Management Needs

According to AFI 32-7065 4.8, the Hurlburt Field CRMP should prioritize their funding needs to include:

- Salaries and training in direct support of cultural resources compliance obligations
- Historic building inventory and evaluation
- Archaeological inventory and evaluation
- Section 106 consultation and development of MOAs and PAs
- Cultural resources portions of environmental impact analysis
- Approved curation of archaeological collections and records
- Government-to-government consultations with Native American Indian Tribes
- Initial preparation and 5-year updates of ICRMPs

Projects and activities which usually do not qualify for environmental funding include:

- Mitigation measures for adverse effects to historic properties, including archaeological data recovery.

- Maintenance and/or repair of historic buildings and structures
- Routine ground maintenance, such as grass mowing, tree pruning, and landscaping, including such activities in historic cemeteries
- Restoration of historic cemeteries
- Weapons system acquisition EIAP costs
- Projects associated with base realignment and closure EIAP costs

Currently, the annual CRMP budget of Hurlburt Field consists of funding for the IST support staff and government-to-government consultations with Native American Indian Tribes (Mark Stanley, personal communication 2014). The salary of the contracted individual who serves as the program manager for the Natural and Cultural Resources programs were previously paid with Environmental program funds.

Obviously, monies to fund priority items are needed, particularly for staff salaries and training. Air Force Instructions and Federal laws require the CRMP staff to receive training in cultural resources management and/or to meet or have access to individuals who meet the Secretary of the Interior's Standards (SOIS) for cultural resource professionals (NHPA Sect 112; AFI 32-7065 4.17.1). The SOIS requires cultural resource professionals to have a degree (usually at the graduate level) in history, anthropology, architecture, or archaeology and to have several years' professional experience working in the cultural resources field (Appendix A). Currently, none of the staff meet the requirements of the SOIS, but they have received training in cultural resources management and have access to qualified professionals through the IST.

The Air Force Cultural Resources Management Playbook requires cultural resource managers (CRM) to receive specific training on federal cultural resources laws and regulations, Section 106 consultations, agreement documents and Native American culture and communications, and recommends additional training in other aspects of cultural resources management. Workshops and training classes are offered by the Department of Defense (DoD) Inter-service Environmental Education Review Board (ISEERB), the Naval School, the Civil Engineer Corps Officers School (CECOS), the Air Force Institute of Technology (AFIT), the Advisory Council on Historic Preservation, the National Park Service, and private corporations. The Hurlburt CRM should refer to the Air Force Cultural Resources Management Playbook for suggested courses.

Workshop training, however, cannot be substituted for the SOIS in certain management situations, and the Hurlburt Field CRMP should work closely with the IST to obtain professional guidance when needed. Chapter 3 and the Standard Operating Procedures (SOPs) provide detailed information about situations where a SOIS-qualified professional is required; however, in general, the Hurlburt Field CRMP should use SOIS-qualified professionals when conducting actions under Section 110 and Section 106 of the National Historic Preservation Act (AFI 32-7065 4.17.2).

Other priority items requiring funding are discussed in the five-year plan in Appendix E. The IST and Hurlburt CRM should use this plan to design the annual budget for the Hurlburt Field CRMP.

2.3.4 Support Air Force Accountability and Reporting Requirements

The Hurlburt CRM is expected to support the accountability and reporting requirements of the Air Force by participating in data calls, annual reporting requirements, and internal and external audits and reviews.

The Hurlburt CRM is expected to reply to several recurring data calls, which include the Annual Report to Congress on Federal Archaeological Activities [also known as Secretary's Report to Congress (SRC)]; the Department of Defense Environmental Program Annual Report to Congress (DEP ARC); the Annual NAPGRA Activities Report; DODI 4714.16 Metrics; Executive Order 13287, "Preserve America" Section 3 Report; and Department of Defense General Funds, "Required Supplemental Stewardship Information" (RSSI) Report. The Hurlburt CRM responds to these calls by submitting the requested data through installation channels. Data management tools and tracking of the inventory and undertakings is a necessity to respond to these calls appropriately and within the given time limits.

Certain agreement documents may also have annual reporting requirements to ensure that the stipulations of the document are being met. Currently, Hurlburt Field CRMP does not have any such compliance requirements, but they should be aware of their existence for future undertakings.

Aside from annual reporting and data calls, the Hurlburt Field CRMP must also participate in internal and external audits of the program. The Environmental Compliance Assessment and Management Program (ECAMP) is responsible for initiating, conducting, and compiling the information from these audits. The Hurlburt Field CRM is responsible for replying to audit requests for information from the ECAMP, and for addressing any problems or deficiencies discovered as a result of the audits. At this time, the Hurlburt Field CRMP does not have any ECAMP findings to address. The last external audit of the program was conducted in March 2013, and the last internal audit was conducted in June 2014.

2.3.5 Management and Maintenance Needs

The goals and objectives for meeting the management needs of the Hurlburt Field CRMP are as follows:

- Consider creation and use of a relational database
- Complete the curation MOU with Eglin AFB
- Fund priority items and the ICRMP goals and objectives
- Relocate the missing archaeological collections and have them returned to Hurlburt Field for curation.

2.4 Compliance with Regulations and Laws

The Hurlburt Field CRMP is required to comply with a number of laws, guidelines, military instructions, statutes, and regulations regarding cultural resources management and protection (Appendix A). The procedures for complying with this legislation are described in Chapter 3. The section below summarizes the compliance actions that have been completed by the Hurlburt Field CRMP since the last

ICRMP, and describes any planned undertakings and compliance requirements that will need to be addressed in the next five years.

2.4.1 NEPA and Section 106 Compliance

The Hurlburt Field CRMP complies with the requirements of the NEPA and Section 106 of the NHPA by participating in the Environmental Impact Analysis Process (EIAP) of Hurlburt Field. As a participant in this process, the Hurlburt Field CRM reviews project proposals through the 813 and 332 forms, initiates the Section 106 process for projects that will adversely affect cultural resources, and works with the NEPA program to provide input on the cultural resources portion of NEPA documents.

Since the last ICRMP update, the Hurlburt Field CRMP has consulted with the SHPO on the adverse effects of six undertakings (Table 2-3). All of the adverse effects of these undertakings were mitigated by modifying the project location, by having a professional archaeologist monitor the ground-disturbing activities, or by developing an agreement document.

Table 2-3: Undertakings mitigated by the Hurlburt Field CRMP through consultation, FY'07-FY'14.

| Undertaking | Year | Consulted Parties | Impacted Sites | Requested Actions | Completed Action |
|---|------|--|---|--|-----------------------------|
| Tree clearance for airfield | 2010 | SHPO | 8OK0380 | Survey cleared area for damage to the site; APE was modified without Section 106 review | Yes; completed as requested |
| Boat Storage Facility | 2011 | SHPO | 8OK1301 | Have professional archaeologist conduct site visit and assess the potential effects of the project | Yes; received concurrence |
| Privatization of Family Housing | 2011 | SHPO, ACHP, Eglin AFB, NFS, Tribes, FL Trust for HP, | 8OK0061, 8OK2627 & 8OK0133; 380 architectural resources | Requires archaeological monitoring of 8OK133 and 8OK061 for activities within 50 m of the sites; allows for demolition of 380 family housing units | Yes; approved 2011. |
| Proposed Installation of Kiosk for Hurlburt Field Nature Trail | 2012 | SHPO | 8OK0126 | Modify the APE and conduct professional archaeological monitoring | Yes; completed as requested |
| Replacement of Sewer Lines at Hurlburt Field Military Housing Complex | 2013 | SHPO | 8OK0168 & 8OK0061 | Limit ground disturbance to existing utility locations and include language in the contract for inadvertent discoveries | Yes; completed as requested |
| Proposed Maintenance of Clear Zone Areas Associated with the Flightline | 2013 | SHPO | 8OK380 & 8OK1301 | None; Consultation was for concurrence with no adverse effect | Yes; received concurrence |

The mitigated undertakings in Table 2-3 also include one Section 106 violation where the location of an undertaking was expanded by the project proponent without additional review by Hurlburt Field. This violation was reported to the SHPO, and all activities on the project were halted by the Hurlburt Field CRM until the SHPO's requested actions were completed.

Hurlburt Field CRMP also works with the Eglin AFB NEPA and CRM programs to review projects that affect Hurlburt Field resources. Table 2-4 lists the undertakings that have been reviewed as a part of the Eglin EIAP since 2007. Italicized undertakings are all from a single project: the construction and modification of the Hurlburt Interchange on Highway 98.

Table 2-4: AF 813 requests for undertakings on Hurlburt Field reviewed by Eglin AFB, FY'07-FY'14.

| RCS Number | Description | Comments |
|-------------------|--|----------------------|
| 14-211 | Waterborne Ops/Training, 7 SFG | |
| <i>14-164</i> | <i>Centurylink move fiberoptic line, HWY 98, Hurlburt entrance</i> | |
| <i>14-131</i> | <i>Cox Communications move line, HWY 98, Hurlburt entrance</i> | |
| <i>13-390</i> | <i>Easement issuance for Centurylink lines</i> | |
| <i>12-650</i> | <i>Easement issuance for Cox Communication lines</i> | |
| <i>12-633</i> | <i>Okaloosa Gas line relocation, HWY 98, Hurlburt entrance</i> | |
| <i>12-614</i> | <i>Southern Light line relocation, HWY 98, Hurlburt entrance</i> | |
| <i>12-601</i> | <i>Centurylink line relocation, HWY 98, Hurlburt entrance</i> | |
| <i>12-597</i> | <i>AT&T line relocation, HWY 98, Hurlburt entrance</i> | |
| <i>12-596</i> | <i>Cox Communication line relocation, HWY 98, Hurlburt entrance</i> | |
| 12-451 | 2 CWSS bldg. 90125, 46 TS testing on the AN/FMQ-23 | |
| 12-240 | 8 MC-130-Ps, the 9 SOS, and 1 SOMXS will move from Eglin to Hurlburt, and the 6 SOS will depart Hurlburt | |
| 12-159 | Installation of fencing, East Bay Flatwoods, Hurlburt-Eglin boundary | Undertaking canceled |
| 12-087 | Easement issuance for Cox Communications, Hurlburt Cantonment | |
| <i>11-752</i> | <i>HWY 98 interchange, Hurlburt gate, EBS update</i> | |
| 11-476 | Replacement/repair of fiberoptic line between Eglin bldg. 380 to Hurlburt bldg. 90215 | |
| 11-314 | 23 STS training A-15 | |
| <i>10-521</i> | <i>Hwy 98 interchange</i> | |
| <i>10-329</i> | <i>Hwy 98 EA</i> | |
| 07-887 | Barricades for Hurlburt Archery Rd and connecting Powerline clearing | |

Since the early 2000s, the NEPA program at Eglin AFB has also acted as the lead agency for the NEPA analysis of three undertakings which impacted Hurlburt Field.

The environmental baseline study for the Military Housing Privatization Initiative (MHPI) was completed by Eglin AFB in 2011 (SAIC 2011). The MHPI document analyzed the impacts of demolishing family housing units on Hurlburt Field and Eglin AFB, and resulted in the development and implementation of a programmatic agreement to mitigate the adverse effects of these actions (Appendix B; Table 2-3).

The Estuarine-Riverine Area revised environmental analysis, completed in 2004, analyzed the impacts of military training on the estuarine and riverine areas located on and near Eglin AFB. The areas analyzed included Santa Rosa Sound, which is used for boats ops, paratroop/paradrops, Navy EOD training, and Live Fire training (AAC 2004:1-5), and is often accessed from the Hurlburt Field boat ramp. A finding of no significant impact (FONSI) was determined from the analysis.

The last document completed by the Hurlburt NEPA program was the Hurlburt Interchange supplemental environmental assessment, which analyzed the environmental impacts of constructing and improving the interchange in front of the Hurlburt Field main gate (HDR 2010). The original EA was completed in 2010, the supplemental EA with a FONSI/FONPA, was completed and signed 7/2013.

Hurlburt Field AFB and Eglin AFB should continue to consult regularly and work closely to review and initiate the NEPA and Section 106 processes for undertakings which will impact Hurlburt Field's cultural resources. Also, many of these mitigated undertakings impacted prehistoric Native American sites, which may be of importance and interest to the affiliated Native American Tribes. In the future, the Hurlburt Field CRM should consider consulting with the affiliated Tribes, in addition to the SHPO, regarding undertakings on prehistoric Native American sites, especially for the two archaeological sites (8OK05 and 8OK126) where NAGPRA remains and items have been recovered. The contact information for these Tribes is located in Appendix C. The Hurlburt Field CRM should also refer to SOP 2, which describes the procedure for initiating consultation with the affiliated Native American Tribes.

2.4.2 Planned undertakings

Planned undertakings which may impact cultural resources on Hurlburt Field generally fall into two categories: 1) infrastructure development and maintenance and 2) environmental management and restoration. Participation in the EIAP by all parties ensures that cultural resource concerns are considered during the early stages of a project, and unnecessary delays and expense are avoided.

Appendix K contains the development and management plans for the various programs whose actions commonly affect cultural resources on Hurlburt Field. These planning documents should be used by the Hurlburt Field CRM to anticipate future needs, and to ensure that cultural resource concerns are considered during routine actions on the installation. Appendix K should be updated annually, or as needed, to reflect changes in programming and planning objectives.

2.4.2.1 Natural Resources

The Natural Resources program manager is also the program manager for Cultural Resources so all natural resources activities are closely reviewed for cultural resources impacts during the early stages of the development process. The main activities of the Natural Resources program, which have the potential of impacting cultural resources, are habitat creation and management, wildfire management and prevention, and timber harvesting and management.

Planned activities by Natural Resources are driven by a land management use plan developed as part of the mitigation of the improvement of twenty-nine acres of wetland in 2000 (AFCEC 2014:7-13; Appendix

K). As a part of the mitigation, Hurlburt Field was required to set aside 3,200 acres of wetlands into preservation for wetland ecosystems, restore 125 acres of uplands, and create 4.5 acres of salt marsh. Hurlburt Field was also required to protect the wildlife preservation areas from any future activities and development that would degrade their ecological value. Future mission critical activities that would necessitate impacts to the preserve areas would result in the development and execution of additional mitigation measures, in accordance with the agreement document.

As a result of these mitigation measures, invasive species are identified, eradicated and managed in a basewide approach, no restrictions are in place for invasive species management (Appendix K). The plans for the remainder of the undeveloped portion of the base include restoration of the longleaf pine habitats and prescribed burns, on a cyclical basis, to maintain the natural habitats and fire-dependent species. Any restrictions placed on wildfire containment are for the purposes of health and human safety not as a result of the mitigation measures.

Forestry management is coordinated through Eglin AFB, who retains property rights to the timber located on Hurlburt Field and are offered first right of refusal for any timber planned for removal. Management practices on the base by the Eglin AFB Forestry program have been restricted to evaluating and selling marketable timber from new construction sites and grounds maintenance activities. Restoration of the longleaf pine has been restricted to the preservation areas on the west side of the base; however, restoration in other areas may occur, as funds allow, in other parts of the base. Impacts to cultural resources from the removal and planting of trees, the construction of access roads, or the maintenance and improvement of forestry roads can be substantial, but are typically mitigated by submitting the undertaking through the Hurlburt Field EIAP for review.

Wildfire suppression and containment is performed by the AFCEC Wildland Fire Center, based on Eglin AFB, with limited assistance from the Hurlburt Field Fire Department. Prescribed burn plans are coordinated through Hurlburt Field's Natural Resources program manager to ensure that the environmental impacts of the burns are reviewed through the Hurlburt Field EIAP before they are conducted.

Hurlburt Field currently does not have an installation wildland fire management plan, although AFCEC, in cooperation with the Hurlburt Field Natural Resources program, is in the process of developing a plan for the base. The Hurlburt Field CRM and/or IST should work with AFCEC to include measures in the plan for protecting cultural resources during controlled burns and wildfire suppression. It is also recommended that the document include the procedures described in SOP 3 and SOP 6. Until this plan is implemented, the AFCEC fire crew will use the policies described in the Eglin AFB wildfire management plan to protect Hurlburt Field's cultural resources during wildfires and controlled burns (Appendix K; Bret Williams, personal communication 2014).

2.4.2.2 Community Planning and Development

Infrastructure development and improvement is an ongoing activity on Hurlburt Field, and can have severe impacts on culture resources if the projects are not reviewed through the EIAP and Section 106 processes. Currently, twenty-five undertakings are active on the base, and twenty-eight are

programmed for funding within the next five years (Appendix K). The planned and ongoing projects include several modifications to the taxiway; the realignment, construction, and widening of several roads; the relocation of the PEA; and the modification, demolition, and construction of several facilities (Appendix K). Several of the large scale projects are tied to the housing privatization initiative, which allows for the demolition of over three hundred family housing units (see the programmatic agreement; Appendix B). Plans associated with this initiative include the construction of new housing units, and a new west gate and access road.

The Hurlburt Field Community Developer should work closely with the Hurlburt Field CRMP to ensure that undertakings are reviewed well in advance of the proposed construction dates so that any required survey or mitigation actions can be completed, and costly delays in the undertakings can be avoided. It is recommended that the CRMP consider completing the following actions based on the planned undertakings for the infrastructure development:

- Architecturally evaluate the airfield and associated structures for the NRHP
- Conduct a LiDAR desktop survey and targeted field survey of the northwest portion of the base
- Archaeologically survey the south side of Range Road 666

2.4.2.3 Roads and Grounds Maintenance and Improvement

Routine land management and grounds maintenance activities conducted on Hurlburt Field include mowing, fertilization, pest management, urban landscape management, and related activities, which are contracted by the Civil Engineers Operations Flight. In general, these activities have limited impacts on cultural resources. However, any major landscaping or maintenance changes should be submitted for review through the base's EIAP, and the procedures for inadvertent discoveries (SOP 3) should be included in the contracts for grounds maintenance.

Road maintenance also has a limited impact on culture resources as long as the maintenance occurs on the existing pavement. Expansion or re-routing of roads or the clear-cutting of vegetation along road right-of-ways should be reviewed by the Hurlburt Field CRM since these activities could adversely affect historic properties.

2.4.2.4 Recreation

Outdoor recreational pursuits on Hurlburt Field include a variety of activities, which are coordinated through Hurlburt Field Outdoor Recreation and the Jackson Guard permit office on Eglin AFB. Recreational use areas and facilities are concentrated on the south side of Highway 98 and the cantonment of the base, and include a skeet range, a campground, a paintball area, the Gator Lakes golf course, the Hurlburt Field Community Park, and the Grace Brown Nature Trail. Opportunities for fishing, boating, kayaking, and canoeing are also available on Hurlburt Lake and in Santa Rosa Sound.

Adverse impacts to cultural resources from recreational activities typically occur due to the increased access and use of an area by the public and military community. The intensive use of the property south

of Highway 98 increases the risk of ARPA violations of the archaeological sites located along Santa Rosa Sound. This risk can be mitigated by the Hurlburt Field CRMP by

- Creating and distributing educational outreach materials about the need to protect and preserve archaeological resources through Outdoor Recreation and Jackson Guard.
- Monitoring sites frequently to ensure that they are not being adversely impacted by recreational activities.
- Educating Recreation staff about ARPA and the procedures to follow for inadvertent discoveries of human or archaeological remains.

Plans for any new recreational facilities or activities, or modifications to existing facilities and activities, need to be coordinated through the Hurlburt Field EIAP for review.

2.4.2.5 Installation Restoration

The Hurlburt Field Restoration program is responsible for locating, testing, and treating contaminated ground water and soil on the base. As part of their responsibilities, the program has permanent testing wells dispersed throughout the base. The program has also developed a seven year management plan for the removal and remediation of known contaminated groundwater and soil located on the base (Appendix K). The plan focuses on collecting soil and water samples, delineating the boundaries of contaminated areas, and removing contaminated soil from the cantonment area of the base (BHATE 2013:4-6). Currently, none of the proposed ground disturbing activities will impact any cultural resources. However, the Restoration program should submit any changes to their plan through the EIAP for review, and consult with the Hurlburt Field CRM regularly to ensure that impacts to any newly-identified resources are considered before ground disturbing activities take place.

2.4.2.6 Military Training

Military training on Hurlburt Field primarily occurs in four areas on the base: the airfield, the permanent exercise area (PEA), the small arms firing range, and the EOD explosive training range. Santa Rosa Sound and East Bay River are also used by units from Hurlburt Field and Eglin AFB for underwater training and exercises using marine vessels.

Military training activities can have varying short-term and long-term impacts on archaeological sites, which should be minimized as much as possible. Pre-op briefings should include a review of the procedures for the inadvertent discovery of human or cultural remains (SOP 3), and should identify any cultural sensitivity areas that should be avoided during the exercise.

Unit and squadron leaders should also be aware of the requirements and penalties of ARPA, and the procedures to follow for reporting impacts to archaeological resources (SOP 6). The Hurlburt Field CRMP and the IST can assist military leaders with training, information, and educational resources regarding the need to protect and avoid cultural resources during military training. The Hurlburt Field CRM should also monitor culture resources located near military training areas to ensure that the resources are not being adversely impacted by the activities (Appendix F).

Major changes to the type or location of military training on the base should be submitted through the EIAP for review. The modification and construction of facilities for training and unit support can also adversely affect historic assets of the base, and should be submitted through EIAP for Section 106 review.

No major changes have occurred in the type or location of military training on Hurlburt Field since the last ICRMP. However, current area development plans call for the relocation of the PEA; an undertaking which should include consultation with the Hurlburt Field CRM before construction proceeds.

2.4.2.7 Real Property

The real property responsibilities for Hurlburt Field are divided between the Eglin AFB Real Property office, who handles the sell and lease of the base property, and the Hurlburt Field Real Property office, who handles the management and maintenance of the base's structures and buildings.

Impacts to cultural resources by the real property programs stem from two actions: 1) the sell or lease of property containing archaeological sites, and 2) the maintenance, modification, and demolition of historic buildings and structures.

Utility easements and road right-of-ways are one of the most common undertakings involving the sell or lease of government-owned property; however, any activity involving the sell, lease, or disposal of government property is considered an undertaking under NHPA, and must be reviewed for cultural resource concerns. As such, all property transactions must be submitted through the EIAP of Eglin AFB for review by the Eglin AFB CRM, who is responsible for consulting with the Hurlburt Field CRM about any undertakings that will adversely affect culture resources (see SOP 1).

The maintenance, modification, and demolition of facilities on Hurlburt Field are daily activities on the base, and are considered undertakings under Section 106 of the NHPA. As undertakings, these actions require review by the Hurlburt Field CRM even though none of the evaluated resources on the base are currently considered NRHP eligible. Review of these undertakings is required because many of the facilities on the base are behind schedule for evaluation, and may require professional review before the impacts of the undertaking can be determined.

The current Air Force Civil Engineering 20/20 by 2020 initiative will also have a huge impact on the historic architectural resources on the base since it requires a 20% reduction in the infrastructure footprint and energy use of the base by 2020. The 20% footprint reduction will require the demolition or major renovation of multiple historic properties on the base, all of which will require NRHP evaluation and Section 106 review.

Given the number of properties that will be impacted by this initiative, it is recommended that the Real Property office work with the Hurlburt Field CRMP to identify impacted resources early in the review process. The development of a programmatic agreement between the Hurlburt Field CRM and the SHPO could also streamline and consolidate the review for this initiative.

2.4.3 Consultation

Hurlburt Field CRMP currently consults with the Florida SHPO and four Federally-recognized Native American Tribes (the Miccosukee Indian Tribe, the Seminole Tribe of Florida, the Seminole Nation of Oklahoma, and the Poarch Band of Creek Indians) regarding undertakings on the base.

Since the last ICRMP, two additional Tribes, the Thlopthlocco Tribal Town and the Muscogee (Creek) Nation of Oklahoma, have identified themselves as Federally-recognized Tribes with ancestral interests in the area. Hurlburt Field should begin consultation with these Tribes to ensure that their interests are represented in the compliance process, and should continue to identify and consult with Tribes who have ancestral interests in the area.

Consultation with state-recognized Tribes is encouraged, but not required by Federal laws. The base has previously consulted with the state-recognized Florida Tribe of the Eastern Creek Indians (now referred to as the Muscogee Nation of Florida), but consultation has not occurred since 1996.

Consultation with Eglin AFB, the public, the military community, local interest groups, local governments, and local communities should also occur as a part of the Section 106 process (see Chapter 3). Hurlburt Field CRMP is encouraged to identify these groups, and invite them to participate in the review process.

2.4.4 Develop and Implement Procedural Programmatic Agreements (PPAs), Memorandums of Understanding (MOUs) and Comprehensive Agreements (CAs)

The development of agreement documents can streamline the review processes for Section 106 of the NHPA, NAGPRA, and ARPA, and expedite consultations with the SHPO, the ACHP, and the Native American Tribes. Currently, Hurlburt Field does not have any agreement documents to simplify these procedures. However, pending changes to AFI 32-7065 may require installations with an ICRMP to develop and implement a PPA with the SHPO and ACHP to expedite compliance and consultation procedures (Mark Stanley, personal communication 2014). In order to anticipate this future requirement, Hurlburt Field CRMP should consider drafting a general PPA with the SHPO and the ACHP to address the Section 106 review process, the procedures for inadvertent discoveries and ARPA, and the procedures for responding to natural disasters and emergency situations (see Chapter 3).

A Cooperative Agreement or MOU between Eglin AFB Cultural Resources Management Program and Hurlburt Field CRMP is also recommended to clarify the responsibilities of each base in regards to the Section 106 review process for Hurlburt Field.

Finally, the Hurlburt Field CRMP should work with the IST to draft regional MOUs and CAs to expedite the installation's Section 106 and NAGPRA review consultations with the affiliated federally-recognized Native American Tribes.

2.4.5 ARPA Enforcement

The Archaeological Resources Protection Act (ARPA) requires the Hurlburt Field CRMP to protect archaeological resources by issuing permits to professional archaeologists to excavate sites, monitoring archaeological sites for damage and destruction, and prosecuting individuals who intentionally damage, destroy, deface, remove items, or sell items from archaeological sites. The Air Force Cultural Resources Management Playbook (Section 1.3.2) further refines the provisions of ARPA by requiring CRMPs to establish a formal program for monitoring and documenting site condition.

Currently, the Hurlburt Field CRMP lacks a formal monitoring program so Appendix F, based on the criteria described in the ARPA and the Air Force Cultural Resources Management Playbook, has been included in this ICRMP to address this requirement. The Hurlburt CRM should work with the IST to gain access to a SOIS-qualified archaeologist to assist with or to conduct the monitoring activities described in Appendix F, and, as needed, to assist with or to conduct the procedures for ARPA violations described in SOP 4

Since the last ICRMP update, no violations to the ARPA have been documented by the Hurlburt Field CRMP, and no permits have been issued for archaeological research.

2.4.6 ARPA Education and Awareness

Section 10(c) of the ARPA requires Federal land managers to develop a program to increase public awareness of the significance of the archaeological resources located on their lands and the need to protect such resources. The Hurlburt Field CRMP is encouraged to work with the IST to expand their existing educational outreach activities, and to develop educational materials to address this requirement. Possible educational activities could include the development of interpretative signs for the Grace Brown Nature Trail, participation in or development of an event for Archaeology month, or the creation of an exhibit for display on the base.

2.4.7 Compliance Needs and Recommendations

The goals and objectives for meeting the compliance needs of the Hurlburt Field CRMP are as follows:

- Develop and implement a PPA with the SHPO and ACHP for compliance and consultation procedures.
- Work with the IST to develop and implement regional MOUs and CAs with the Native American Tribes
- Develop and implement a MOU or CA with the Eglin AFB CRMP
- Develop and implement a formal archaeological site monitoring program using the information in Appendix F.
- Produce and distribute educational and outreach materials. Participate and plan public outreach and awareness events. Conduct internal training.

- Consult with the affiliated Native American Tribes regarding undertakings on prehistoric sites and other resources of Tribal interest.
- Initiate consultation with the Thlopthlocco Tribal Town and the Muscogee (Creek) Nation of Oklahoma
- Consult and request assistance from the IST for compliance needs
- Work with AFCEC to include cultural resources protection measures in the installation wildfire management plan.
- Budget and conduct surveys and evaluations in anticipation of future undertakings.
- Research the repatriation of the burials from 8OK126 and 8OK05, and determine if all NAGPRA required procedures were completed.

3 Compliance Procedures

The Section 106 process of the NHPA is the main compliance procedure used by the Hurlburt Field CRMP to review the potential impacts of projects on cultural resources. 32 CFR Part 800 describes the procedure in detail (Appendix A). A summary of this procedure and how it is integrated into other environmental review processes is described in this chapter.

3.1 The Section 106 Process

The Section 106 process (32 CFR 800.3-7) of the NHPA requires the Hurlburt Field CRMP to 1) determine if a project is an undertaking, 2) determine what effect the project will have on historic resources, 3) and resolve or mitigate any adverse effects to historic resources. This process is incorporated into the environmental impact analysis process (EIAP), which the Air Force uses to meet the review requirements of the National Environmental Policy Act (NEPA). The EIAP is initiated when the project proponent submits an Air Force Form 813, Air Force Form 332, or DD Form 1391 to an interdisciplinary team for review. As a part of the review team, the Hurlburt Field CRMP uses the information in the form to initiate the Section 106 process.

The steps of the Section 106 review process are described below:

Step 1→*Is it an undertaking?*

As a Federal agency, most activities and projects on Hurlburt Field can be classified as an undertaking, which is defined by 32 CFR 800.16(y) as

A project, activity, or program funded in whole or in part under the direct or indirect jurisdiction of a Federal agency, including those carried out by or on behalf of a Federal agency; those carried out with Federal financial assistance; and those requiring a Federal permit, license or approval.

Since most projects on Hurlburt Field are undertakings, it is vitally important for the Hurlburt Field CRMP to continually identify and consult with parties who have vested interests in the cultural resources of the base. Consulting parties for cultural resource concerns can include the Florida SHPO, the THPOs, the public, the ACHP, Native American Tribes, and local interest groups. Early coordination with consulting parties is encouraged by both the NEPA and Section 106 processes to prevent delays in any proposed undertakings.

Since most projects on the base are considered undertakings, the review proceeds to Step 2.

Projects that do not qualify as an undertaking are dismissed from additional review.

Step 2→*Will this undertaking adversely affect historic resources?*

In order for the Hurlburt Field CRM to answer this question, the 813 or 332 should supply the following information:

- What is the purpose and need of the undertaking?
- What activities does the undertaking entail?
- What is the location and extent of the undertaking?

The Hurlburt Field CRM uses this information to determine the area of potential effect (APE) for the project, the NRHP eligibility of any historic resources located within the APE, and the effect the undertaking will have on historic resources.

As described in Chapter II, historic resources are any district, site, building, structure, or object that is included in or considered eligible for inclusion in the National Register of Historic Places. Section 110 of the NHPA requires Federal land managers to conduct inventory surveys to identify and evaluate historic resources for the NRHP, including resources located underwater. Managers are also required to consult with Native American Tribes and other interested parties to identify culturally-significant locations, like TCPs, cemeteries, and sacred sites, which require protection. This compiled information is then used to assess the impacts of an undertaking on cultural resources.

An adverse effect to a resource would result from any action that alters or diminishes the integrity of an historic resource's location, design, setting, materials, workmanship, feeling, or association.

These actions can include:

- Physical destruction or damage of all or part of a property
- Alteration of a property that is not in keeping with the Secretary of Interior's Standards for the Treatment of Historic Properties (36 CFR 68)
- Removal of a property from its location
- Change in a property's use or in the physical features which contribute to its historic significance
- Addition of visual, audible, or atmospheric elements that diminish a property's integrity
- Neglect of a property which leads to its deterioration (unless this is a normal aspect of a Native American religious site)

- Transfer, lease, or sale of a property out of Federal ownership or control (unless proper preservation restrictions are included in the document)

On a military installation, these adverse effects can originate from a variety of actions, events, and activities on the base, which include:

- Infrastructure development and maintenance
- Military training
- Maintenance and development of natural habitats and resources
- Restoration of contaminated soil or water
- Timbering and forestry activities
- Recreational and residential activities
- Natural disasters and clean-up
- Aircraft crashes and clean-up
- Wildfire prevention and containment
- Natural processes, such as erosion, sinkholes, and subsidence
- Criminal activities, such as vandalism, trespassing, theft, and looting
- Chemical spills and restoration

The presence of cultural resources does not prohibit activities, such as military training or infrastructure development, from taking place. However, it does legally require federal land managers to follow the Section 106 procedure to anticipate these adverse impacts to cultural resources, and to develop ways to lessen or avoid these effects.

If the project will not adversely affect historic resources then...

The Hurlburt Field CRM can clear an undertaking of additional review if no historic resources are located in the APE.

The presence of historic resources in the APE requires consultation by the Hurlburt Field CRM with the SHPO, THPOs, and other consulting parties to obtain concurrence with the finding of no adverse effect. If any consulting party disagrees with this finding, then the objecting party must inform the Hurlburt Field CRM of their decision within thirty days. The Hurlburt Field CRM can then consult with the objecting party or request advice from MAJCOM to determine if a review and decision about the disagreement by the ACHP is required. The ACHP has fifteen days upon receipt to provide a decision. If the Council agrees with the finding of no adverse effect or does not provide an opinion then the review is considered complete. If they disagree, then the SECAF takes the Council's decision under consideration, and provides a written decision for the Air Force to the consulting parties. If the SECAF agrees that the undertaking will have an adverse effect then it proceeds to the next step of the Section 106 process; otherwise, the Section 106 process is concluded.

The review process for undertakings with no adverse effect can be expedited by the creation of a programmatic agreement between the base and the consulting parties (see Step 3 below).

Currently, Hurlburt Field does not have such an agreement, but the creation of one is recommended.

If the effects of the project cannot be determined because the inventory or property evaluation is incomplete then...

The Hurlburt Field CRM works with the IST to contract a qualified professional, who meets the Secretary of Interior's Standards (SOIS), to identify and evaluate any resources located in the APE. Results from these investigations are provided to the CRM to send to the SHPO and, when appropriate, other consulting parties for concurrence. The SHPO and other parties are given thirty days to review and concur with the findings. After concurrence is reached, the undertaking proceeds to the next step of the process if NRHP-eligible properties will be adversely affected. Otherwise, the requirements for a finding of no adverse effect are followed (see above).

If concurrence with the SHPO about the eligibility of a property cannot be reached then the Hurlburt Field CRM, in coordination with MAJCOM or AF SME, can seek a decision about the disagreement from the Keeper of the NRHP. The Keeper will respond within forty-five days of receipt with a decision or a request for additional information. Any decision made by the Keeper is considered final.

If the undertaking will adversely affect historic resources then it moves to step 3.

Step 3→*Resolve or mitigate the adverse effects*

Adverse effects can be mitigated in three ways: the undertaking can be cancelled, the APE can be modified to avoid the adverse effect, or the effect can be mitigated by drafting and signing an agreement document.

Obviously, the quickest and most cost-efficient way to resolve an adverse effect, while allowing the undertaking to proceed, is to modify the APE. However, this is not always possible, depending on the goals and location of the undertaking, and, as a result, an agreement document must be drafted. If avoidance is possible, then the Hurlburt Field CRM must consult by a letter or a short MOA to receive concurrence with the modified APE (see above). If the consulting parties agree that the modification resolves all adverse effects then the process is complete. Otherwise, the Hurlburt Field CRM must pursue agreement on plans for a more complete mitigation of the original undertaking.

The adverse effects of most undertakings are mitigated using a memorandum of agreement (MOA). A MOA is used for undertakings where the APE is well-defined, and the project involves a single, finite action (i.e., construction of a road).

Larger scale undertakings, like BRAC closures or housing privatization, require mitigation through a programmatic agreement. Programmatic agreements are also used to expedite

compliance procedures where multiple, reoccurring undertakings take place; for example, a historic architectural district where continual maintenance and modification of the individual buildings is required.

Regardless of which agreement document is used, the base is legally required to invite all consulting parties to participate in the drafting of the document. This invitation must include the ACHP, who are legally given fifteen days from receipt of the invite to confirm their participation in the process. An invite to the SHPO is also legally mandated, and they are given thirty days from receipt to confirm their participation. Time limits are not legally mandated for the rest of the consulting parties; although, programmatic agreements between the base and a consulting party may specify a time limit that must be followed. In general, most parties are given thirty days to respond to an invitation to consult.

Signatories are consulting parties with the sole authority to execute, amend, or terminate the agreement. Required signatories are the installation commander, the SHPO, and the ACHP (if they request to participate); although, additional parties, like the Native American Tribes and the THPOs, can be invited to participate as signatories.

Concurring signatories are parties invited to concur with stipulations of the agreement, but whose participation is not required to execute the document.

Failure to invite parties to participate in the agreement process can lead to delays in the undertaking, and possibly litigation. The ACHP also has the legal authority to foreclose an undertaking and restart the Section 106 process if an agreement document is signed without requesting their participation.

Templates for MOAs can be found online and at the ACHP website (<http://www.achp.gov>). In general, any agreement document should include:

- Measures to avoid, mitigate, or minimize the adverse effects on the historic properties
- Duration of the agreement
- Procedures for post-review discoveries
- Procedures for monitoring and reporting
- Procedures for resolving disputes between the signatory parties
- Terms for non-compliance or amending the agreement document
- Terms for terminating the agreement

Cultural resource professionals are encouraged to think outside of the box when developing mitigation plans for a MOA. However, mitigation plans should meet or exceed the Secretary of Interior's standards (SOIS) and the standards of the Florida SHPO, which interpret and provide guidance for fulfilling the requirements of the NHPA (Appendix A). The state and federal standards also specify the qualifications for contractors who are hired by the project proponent to conduct mitigation measures. The Hurlburt Field CRM is responsible for ensuring that contractors working

on the base meet these qualifications, and that the mitigation measures in the MOA are met and executed in a manner that satisfies the requirements of the standards.

A draft version of the document is sent to all of the signatories for comment and revision. At a minimum, the reviewers of the draft for Hurlburt Field should include the Hurlburt Field CRM, the Staff Judge Advocate Office, the NEPA program (when appropriate), the installation commander, the base civil engineer, and the IST. Once the draft is acceptable, it is finalized and the installation commander forwards the document to MAJCOM for review. Once the document is cleared of all concerns by MAJCOM, it is signed by the installation commander or the commander's delegate (or Air Force FPO for Air Force-wide undertakings) and all primary and concurring signatories. The signed document is then forwarded by the installation commander to SAF/IFEE for review, and the CRM submits the signed agreement document, through MAJCOM or AFCEC, to the ACHP.

If an agreement cannot be reached by the signatory parties then any party can terminate, by written notice, the consultation proceedings.

If the installation terminates the consultation then the Hurlburt Field CRM will seek input about the undertaking from the ACHP. The Council has forty-five days, upon receipt, to review and provide comment about the undertaking. The installation commander must take into consideration the Council's response before providing a written decision to proceed with the undertaking or to restart the Section 106 process.

If the SHPO terminates consultation, then the installation and the ACHP can execute a MOA without the SHPO's participation.

If any external stakeholders (SHPO/THPO, ACHP, the public, etc.) or the Air Force headquarters staff higher than the installation express concern over a Section 106 issue, all future versions of related MOAs/PAs will require MAJCOM CRM/legal and CRM SME/HQ legal review before release outside the Air Force.

Step 4→*Conduct mitigation measures*

The project proponent cannot begin any undertaking activities until all requirements of the MOA are met. Typically, MOAs will include a "sunset clause" that specifies how long the mitigation measures will take. Archaeological or architectural mitigation measures must be conducted by SOIS qualified professionals and in accordance with SOI standards and guidelines and the stipulations in the agreement document. An Air Force Form 103 must be submitted by the contracted professional before mitigation can begin. Coordination with Range Control or the Safety Officer may also be necessary in areas where active military training occurs.

Mitigation of architectural resources typically requires one of four levels of Historic American Building Survey (HABS) or Historic Architecture and Engineering Record (HAER) documentation. Reuse and rehabilitation of historic buildings are strongly encouraged by the Preserve America Act, and when this is not possible, the recycling of the historic building materials should occur.

Archaeological site mitigation usually requires data recovery, which is the whole or partial excavation and documentation of the site.

Alternative mitigation is also encouraged, and can include:

- the creation of interpretive displays, travelling exhibits, or local or on-base museum exhibits depicting the larger context of the historic property
- the research and development of a high quality historic and or photographic book for publishing and widespread distribution
- the reconstruction and preservation of one or two of a number of historic buildings, allowing the remainder to be modernized, upgraded, or otherwise modified
- the creation of a full sized representative model using minimal and long lasting materials in the location of an historic property
- the research and development of a regional archaeological model based on existing data in place of data recovery at a specific redundant site type
- allowing local university researchers to fully excavate an important archaeological site that is not threatened by any undertaking, using archaeological field school staff and students, along with installation volunteers; in effect, substituting a rare type of archaeological site for the more redundant site that will suffer adverse effects
- the dismantling, and rebuilding elsewhere, perhaps in an off-base historical park or recreation area, of an important building scheduled for demolition (Air Force Cultural Resources Playbook 2014:79).

At the conclusion of the mitigation activities, the contracted professional will submit a report, meeting Florida SHPO standards, to the Hurlburt Field CRM for review. Any materials collected during archaeological excavations will be submitted to the Hurlburt Field CRM in a condition that meets the standards in Appendix G. The Hurlburt Field CRM will provide a copy of the report to the SHPO and to any other parties, as specified in the MOA, for concurrence. After all parties concur with the findings in the report then the Hurlburt Field CRM will allow the project proponent to begin the undertaking.

Table 3-1: Air Force Agreement Documents for Architectural Resources.

| Building type | Construction Period | Concurrence type | Concurrence date | Exempted Actions | Reference |
|---|----------------------------|-------------------------|---|---|---|
| World War II Temporary Building | 1939-1946 | Programmatic Agreement | 1991 | Demolition | http://www.achp.gov/pa6.pdf |
| Capehart-Wherry Family Housing | 1949-1962 | Program Comment | 2001 (Army); 2004 (Air Force & Navy) | Maintenance & repair; rehabilitation; layaway & mothballing; renovation; demolition; demolition & replacement; transfer, sale or lease. | http://www.denix.osd.mil/cr/upload/AF-USN_CW_PC-18NOV04.pdf |
| World War II & Cold War Era Ammunition Storage Facilities | 1939-1974 | Program Comment | 2006 | Maintenance & repair; rehabilitation; layaway & mothballing; renovation; demolition; demolition & replacement; transfer, sale or lease. | http://www.denix.osd.mil/cr/upload/program_comment_DoD-Ammo-Storage_18Aug06.pdf |
| Cold War Era Unaccompanied Housing | 1946-1974 | Program Comment | 2006 | Maintenance & repair; rehabilitation; layaway & mothballing; renovation; demolition; demolition & replacement; transfer, sale or lease. | http://www.denix.osd.mil/cr/upload/program_comment_DoD-UPH_18Aug06.pdf |
| Alternative Compliance for the Rehabilitation Treatment of Historic Buildings | | Program Comment | 2008 | SOIS-qualified rehabilitation of a building (with SHPO concurrence). | http://www.denix.osd.mil/cr/upload/DoDProgramComment.pdf |

3.2 Air Force Agreement Documents and Program Comments

Hurlburt Field currently has one agreement document to streamline the Section 106 review process. The agreement document, signed in 2011, allows the installation to demolish 380 family housing units without further review (Appendix B).

The Air Force has also developed similar agreements and sought ACHP comment on streamlining the process for several architectural resource types (Table 3-1). The agreements and comments in Table 3-1 allow Hurlburt Field to exempt certain undertakings from additional Section 106 review as long the undertaking will not adversely affect another historic property, district, archaeological site, TCP, or sacred site. Programmatic exemptions do not excuse the Hurlburt Field CRMP from their Section 110 responsibilities of identifying and evaluating these resources for the NRHP, but the agreements do mitigate the adverse effects a specific action has on these resources. The Hurlburt Field CRM should refer to the referenced documents for information on how to apply these exemptions during the Section 106 review process.

3.3 Section 106 Process Timeline and Fiscal Responsibility

Table 3-2, below, provides an estimated timeline for the Section 106 process. In general, most project proponents should plan on at least four to six months to reach the signature stage of a MOA, and six to twelve months to reach the signature stage of a PA.

Table 3-2: Timeline for the Section 106 Review Process (adapted from AFCEC Cultural Resources Playbook 2008)

| Action | Responsible Party | Estimated time |
|--|-----------------------------|-----------------------|
| Review undertaking | | |
| Determine if historic properties are affected | Hurlburt Field CRM | <1 day |
| Document the absence of historic properties | Hurlburt Field CRM | <1 day |
| If resources are present, determine if the undertaking will create an adverse effect | Hurlburt Field CRM | 2-3 days |
| If no adverse effect, | | |
| Request concurrence | Hurlburt Field CRM | |
| Review of request | SHPO/THPO/Other parties | 30 days |
| Objection to finding | SHPO/THPO/Other parties | Varies |
| Challenge of objection | SHPO/THPO/Other parties | Varies |
| If effect is adverse, | | |
| Consult to determine mitigation plans | CRM/SHPO/THPO/Other parties | Varies |
| Mitigation | | |
| <i>Mitigate through Avoidance</i> | | |
| Document avoidance plans and seek concurrence | SHPO/THPO/Other parties | 30 days |
| Objection to avoidance measures | SHPO/THPO/Other parties | Varies |
| <i>Mitigate through Agreement document</i> | | |
| Draft MOA/PA | CRM/SHPO/THPO/Other parties | Varies |

| | | |
|-------------------------------------|---|--|
| Submit draft for review | CRM/SHPO/THPO/Other parties | 30+days |
| Finalize draft and submit to MAJCOM | Installation commander/MAJCOM | Varies |
| Sign document | Installation commander/SHPO/THPO/ACHP/Other parties | Varies |
| Review of signed document | CRM/ACHP/MAJCOM | Varies |
| Execution of MOA/PA | CRM | Varies, specified in document |
| Inadvertent discovery | CRM/THPO/SHPO/Installation commander/Other parties | Varies, depending on the discovery type. |

The project proponent is responsible for funding the mitigation measures. Tenant units on Hurlburt Field may be required to fund cultural resources surveys and other work in their areas, depending on the language in their Inter-Service Support Agreement. Proponents should take these funding needs into consideration when planning their budget for an undertaking or the upcoming fiscal year.

3.4 Inadvertent Discoveries

Inadvertent discoveries of archaeological resources and human remains can occur during the mitigation measures of an undertaking or during ongoing activities, like military training. If archaeological materials or human remains are encountered then all activities in the immediate area must cease, the Hurlburt Field CRM must be called, and the procedures described in this section and SOP 3 must be followed. The Hurlburt Field CRMP should work with the Contracting Office to ensure that SOP 3 is included in all contracts where ground-disturbing activities will take place, and in the package for all range users.

3.4.1 Inadvertent Discovery of Archaeological Resources

If artifacts, archaeological features, or buried large animal skeletal remains are inadvertently discovered during the course of an undertaking, the Hurlburt Field CRM will coordinate with security forces to secure the area, and immediately contact the IST to acquire the assistance of a SOIS qualified archaeologist to assess the discovery.

The archaeologist will document the discovery and provide a report of their findings to the Hurlburt Field CRM and IST within twenty-four hours. The report will document all of the inadvertently-discovered artifacts, describe their context, identify any items that may be affiliated with the Native American Tribes with ancestral interests in the area, and determine if a site number and NRHP eligibility determination are required. The Hurlburt Field CRM and IST will use this report to determine if the discovery requires additional Section 106 investigation. Activities can resume at the location after the items have been recorded and evaluated in accordance with the ARPA and the NHPA.

3.4.2 Inadvertent Discovery of Human Remains

If human remains are found, the Hurlburt Field CRM will request the Security Forces to secure the area and contact the IST to acquire the assistance of a SOIS qualified archaeologist familiar with the region's history to determine if the remains are potentially Native American. The installation commander must

be immediately notified of the discovery, and the installation commander must notify MAJCOM of the discovery and provide written verification to the Hurlburt Field CRM that he/she was notified of the discovery. If the discovery occurs during the mitigation of a Section 106 undertaking then stipulations in the agreement document may require other parties to be contacted about the discovery within a certain amount of time.

If the archaeologist believes the remains may be evidence of recent criminal activity (less than 75 years), the CRM will inform the installation commander of the finding so he or she can request the assistance of the district medical examiner and law enforcement. Otherwise, the archaeologist will document the discovery and provide a report of the findings to the Hurlburt Field CRM and IST within twenty-four hours. The report will document all of the inadvertently-discovered artifacts and/or human remains, describe their context, identify any remains or items that may be affiliated with the Native American Tribes with ancestral interests in the area, and determine if a site number and NRHP eligibility determination are required. The Hurlburt Field CRM and IST will use this report to determine the appropriate course of action based on the ethnic-affiliation of the individual and any associated items.

3.4.3 Inadvertent Discovery of Historic Human Remains

The discovery of human remains that are not those of a Native American requires consultation with the SHPO, and the initiation of the NHPA Section 106 process. Ground-disturbing activities can resume at the site after the remains or artifacts have been recorded and evaluated in accordance with ARPA and NHPA. Procedures to be followed for this type of discovery can be developed and executed through a PA. Hurlburt Field is encouraged to develop this type of agreement document, possibly at the IST-level.

3.4.4 Inadvertent Discovery of Native American Human Remains or Cultural Items

The discovery of Native American human remains and cultural items, either inadvertently or during planned excavations, initiates the process for the Native American Graves Protection and Repatriation Act (NAGPRA). NAGPRA requires the Hurlburt Field CRM or the installation commander to contact the Federally-recognized Native American Tribes/THPOs who may be culturally affiliated with the discovery, provide them with the archaeologist's report, and seek their input within three days of the discovery.

Procedures for the recovery or preservation of the remains or items will be developed through consultation with the affiliated Tribes, and a Plan of Action will be prepared and executed if the remains or items must be removed. Ground-disturbing activities can resume in the area 1) thirty days after the commander certifies that he/she was notified of the discovery, 2) when the Plan of Action has been executed (if less than thirty days), or 3) when the installation commander and the affiliated Tribal officials agree on a course of action that does not require the removal of the items or remains (if less than thirty days).

The SHPO does not need to be consulted regarding the discovery of Native American human remains or cultural items, unless the discovery is part of an archaeological site that must be identified and

evaluated under the NHPA or consultation is required by an agreement document. If a NHPA Section 106 consultation is required then the consultation will run concurrently with the NAGPRA consultation. Native American Tribes may participate in the concurrent NHPA consultation; however, the SHPO may not participate in the NAGPRA consultation.

Hurlburt Field is encouraged to develop comprehensive agreements (CAs) with the Federally-recognized Native American Tribes with ancestral ties to the area. CAs function like PAs by describing agreed upon procedures to be followed in the event of inadvertent discoveries or emergencies related to land management activities on the installation. CAs, like PAs, can be developed for multiple bases at the IST-level.

3.5 The Section 106 Process and NAGPRA

Planned excavations of Native American graves, either as a result of the Section 106 process or through an ARPA permit (see below), requires consultation with the affiliated Native American Tribes, and the development and approval of a Plan of Action. Excavations can begin when the Plan is accepted by the Tribes.

Consultation and a Plan of Action can be used prior to the excavation of any archaeological site where Native American graves or cultural items are likely to be encountered. This advanced planning can be used in situations where a comprehensive agreement (CA) is not in place to avoid the delays created by an inadvertent discovery. However, the NAGPRA process for planned excavations cannot replace the Section 106 process, which should be conducted, when appropriate, in conjunction with NAGPRA.

3.6 Integration of the Section 106 process with the NEPA process

The Section 106 process is often integrated with the process of the National Environmental Policy Act (NEPA), which requires a responsible official of the installation to write a detailed statement about any major Federal action that significantly affects the quality of the human environment (Sect 102 C). On Air Force bases, the review process of the NEPA is referred to as the Environmental Impact Analysis Process (EIAP), which is overseen by the NEPA program and the installation commander.

The EIAP requires Air Force personnel to

(a) Consider and document environmental effects of proposed Air Force actions through AF Forms 813, EAs, FONSI, EISs, RODs, and documents prepared according to E.O. 12114.

(b) Evaluate proposed actions for possible CATEX from environmental impact analysis

(c) Make environmental documents, comments, and responses, including those of other federal agencies, state, Tribal, and local governments, and the public, part of the record available for review and use at all levels of decision making.

(d) Review the specific alternatives analyzed in the EIAP when evaluating the proposal prior to decision making.

(e) Ensure that alternatives to be considered by the decision maker are both reasonable and within the range of alternatives analyzed in the environmental documents.

(f) Pursue the objective of furthering foreign policy and national security interests while at the same time considering important environmental factors.

(g) Consider the environmental effects of actions that affect the global commons.

(h) Determine whether any foreign government should be informed of the availability of environmental documents. Formal arrangements with foreign governments concerning environmental matters and communications with foreign governments concerning environmental agreements will be coordinated with the Department of State by the Deputy Assistant Secretary of the Air Force for Environment, Safety, and Occupational Health (SAF/IEE) through the Deputy Undersecretary of Defense (Environmental Security). This coordination requirement does not apply to informal working level communications and arrangements.

The EIAP incorporates the Section 106 process when an undertaking adversely affects cultural resources (Figure 3-1), and can be substituted for the Section 106 process in certain situations (see 36 CFR § 800.8(b)). Projects must complete both processes in order for the review of the undertaking to be considered finished. The Hurlburt Field CRMP participates in the EIAP to ensure that this integration, and the completion of the Section 106 process, takes place, and provides expertise and guidance in the development of project alternatives, the review of NEPA-associated documents, and the execution of mitigation strategies.

Participation in and the satisfactory completion of the EIAP process by all base programs and project proponents minimizes the conflicts and impacts that cultural resource compliance and management requirements can have on other military and program missions. To assist in minimizing these conflicts and impacts, the Hurlburt Field CRM should participate in the EIAP process by

- Attending AF Form 813 Work Group meetings
- Reviewing projects submitted electronically on the AF Form 813 website, and initiating the Section 106 review process, as required.
- Notifying the NEPA program if a consultation is required, and advising when a project should be placed on hold until the Section 106 review is complete.
- Acting as the POC for proponents whose projects require Section 106 review, and be responsible for contacting the proponent to gather any information necessary to prepare consultation documentation.
- Ensuring the timely preparation of consultation packages
- Ensuring all Section 106 documentation is submitted for the appropriate internal review and signatures

- Internally tracking the deadlines and submittals for the Section 106 process.

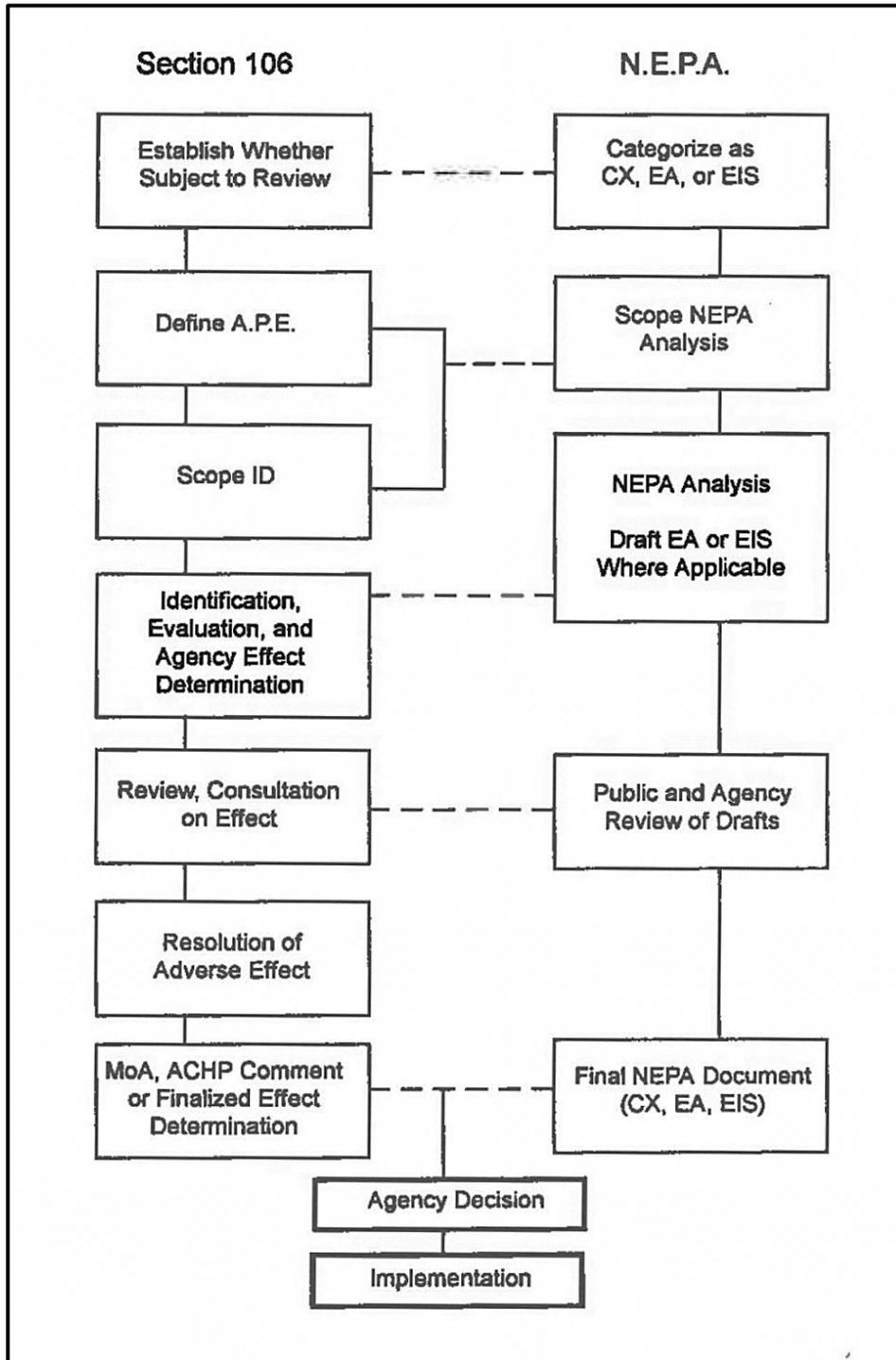


Figure 3-1: Flowchart showing the integration of the Section 106 and NEPA processes (King 1998:136)

The Air Force Civil Engineering Playbooks for Cultural Resources Management and the EIAP Process also provide good advice and tips for effectively participating in and navigating the EIAP process. The

playbooks can be accessed at <https://app.eis.af.mil/a7cportal/CEPlaybooks/Pages/default.aspx> using a CAC card.

3.7 The Section 106 Process and Emergency Situations

The NHPA encourages Federal agencies to develop procedures to take historic resources into account during operations responding to a Federally-declared or State-declared disaster or emergency (36 CFR 78). Emergency procedures typically expedite the Section 106 process, and can only be implemented for undertakings that occur within thirty days of the disaster or emergency declaration.

Currently, there are no Air Force-wide procedures for responding to emergency or disaster situations. As a result, installations are responsible for developing their own procedures.

Installations may comply with the requirements of the NHPA by

- 1) Developing procedures in consultation with the SHPO, Native American Tribes, and the ACHP, and having them approved by the ACHP.
- 2) Creating and receiving concurrence on a PA or MOA that contains these procedures
- 3) Notifying the ACHP, the SHPO, and the Native American Tribes prior to the undertaking of the proposed actions, and providing them seven days, from receipt, to respond. If the installation commander determines that circumstances do not permit seven days for comment, the commander shall notify the ACHP, the SHPO/THPO and the Native American Tribes and invite any comments within the time available.

Immediate rescue and salvage operations conducted to preserve life or property are exempt from Section 106 review.

Hurlburt Field currently does not have an agreement or ACHP-approved procedures that address emergency or disaster situations, and is strongly encouraged to develop these procedures in the near future. Until this is accomplished, SOP 5 describes the procedures for imminent disaster preparedness (Section 110 waiver), and the process for an expedited Section 106 review (item 3 above) after an emergency or disaster situation.

Modern aircraft wrecks and post-crash clean-up are not considered declared emergencies. However, AFI 32-7065 4.1.2 requires the Hurlburt Field CRM to determine if the crash or the post-crash clean-up has or will adversely affect NRHP-eligible resources. If this has or will occur then the Section 106 process must be followed. SOP 6 addresses the procedures the Hurlburt Field CRM should follow for modern aircraft crash sites and any other undeclared natural disaster or emergency situation.

3.8 Other Compliance Procedures

3.8.1 The Archaeological Resources Protection Act

The Archeological Resources Protection Act (ARPA) requires Federal land managers to preserve archaeological resources by prosecuting individuals who damage, destroy, or remove items from archaeological sites, issuing permits to qualified individuals for scientific investigations, monitoring the condition of archaeological sites on Federal property, and educating the public about archaeology and the need to protect archaeological sites. The paragraphs below describe the procedures for enforcing ARPA and issuing ARPA permits. Compliance with the site monitoring requirement of ARPA is described in Chapter 2 and Appendix F.

3.8.1.1 Issuing ARPA permits

ARPA permits can be issued to SOIS-qualified archaeologists for excavations on Hurlburt Field as long as the investigations will further the archaeological knowledge of our Nation's past. Permit seekers must provide information regarding the research design, curation plans, schedules, logistics, locations for field and laboratory work, and reporting formats and schedules of the proposed work to the Hurlburt Field CRM for review. The Hurlburt Field CRM, with assistance from the IST, will review the proposed activities and submit an Air Force Form 813 for NEPA and Section 106 review of the project. If the Hurlburt Field CRM decides to approve the permit, based on the input from the review process, he or she will inform the Native American Tribes of the proposed work. The Tribes must be provided with this notification at least thirty days in advance of issuing the permit for work that will adversely affect an Indian tribal religious or cultural site. The CRM is not required to consult with the SHPO, but he/she may wish to inform them of the proposed action for their situational awareness.

After the Hurlburt Field CRM reviews the proposed project and consults with the applicable parties, the CRM will submit the permit to the Base Civil Engineer (BCE) or the Installation Commander for signed approval. A copy of the signed permit will be provided to the permit seeker and retained by the Hurlburt Field CRMP. Permit oversight responsibilities fall to the Hurlburt Field CRM, but are ultimately within the purview of the BCE or installation commander.

If the ARPA permit is approved, the permit holder must submit an AF Form 103 for signatures and review before beginning any excavations, and must coordinate with Range Control and the Safety Officer for their personal safety. Any artifacts or samples recovered during the excavations are considered Air Force property, and must be returned to Hurlburt Field CRMP, in a timely manner that fulfills the curation standards in Appendix G.

Section 110 inventory activities or Section 106 mitigative activities conducted by or for the Hurlburt Field CRMP do not require an ARPA permit.

3.8.1.2 ARPA Enforcement

Destruction, damage, excavation, or removal of items from an archaeological resource, without an ARPA permit, is considered a violation of ARPA and is prosecutable under the law. The Hurlburt Field CRMP

and the Hurlburt Field Security Forces are responsible for patrolling the base property to prevent, identify, document, and prosecute ARPA violations. If a violation or evidence of a violation is encountered, or the Hurlburt Field CRM is informed of a violation, the site or location should be treated as a potential felony crime scene, and the Security Forces should be contacted to secure and document the scene. The Hurlburt Field CRM should only approach the area to confirm that the damage to the archaeological resource is man-made. If perpetrators are still on the scene, the CRM should view the illegal activities from a safe distance while contacting security forces for assistance.

Once ARPA-trained security forces arrive, the CRM should work with the officers and the IST to follow the procedures in SOP 4.

Individuals who are found excavating, removing, damaging, altering, or defacing archaeological resources, which are 100 years of age or older, or attempting to pursue these activities on Hurlburt Field, without an ARPA permit, are subject to a fine up to \$100,000 or five years imprisonment. The same punishments apply if an individual is caught selling, purchasing, exchanging, transporting, receiving, offering to sell, purchasing, or exchanging any archaeological resource 100 years of age or older found on Hurlburt Field, or hiring someone to pursue these activities.

3.8.1.3 DODI 5525.17

DoDI 5525.17 further refines the provisions of ARPA by requiring all military installations to create a Conservation Law Enforcement Program (CLEP) to enforce the laws protecting natural and cultural resources. DoD Component Heads are responsible for establishing policies and procedures to implement the CLEP, to integrate the CLEP with the component law enforcement programs, to ensure that conservation law enforcement officers (CLEOs) are available and responsible for performing the tasks of the CLEP, to ensure CLEP planning is included in the installation's ICRMP and INRMP, and to establish agreements to maximize enforcement capabilities (DODI 5525.17 Encl 2 Sect 3(a-e)).

At this time, the DoD Component Head has not initiated the creation of the CLEP for Hurlburt Field. As a result, the goals and objectives of the CLEP that are a required part of this ICRMP (as described in Enclosure 3 of DoDI) cannot be addressed in the current version of this document. The development and requirements of the CLEP should be added during the annual updates of the ICRMP, as they occur, and the creation and implementation of the CLEP is included as a five year goal in this ICRMP (see Appendix E).

3.8.1.4 Educational Outreach and Awareness

Education and outreach is the key to preventing ARPA violations on Hurlburt Field. ARPA (16 U.S.C. 470ii Sec 10.c) requires Federal land managers to establish a program to increase public awareness of the significance of the archaeological resources located on their property. AFI 32-7065 4.2.5 also requires the installation commander to ensure that security forces, legal staff, the public affairs office, and the fish, game, and recreation management staff are familiar with the requirements and applicable

penalties under ARPA. The Hurlburt Field CRM is encouraged to work with the IST to develop internal training, a public outreach program, and educational materials to address these requirements.

3.8.2 Fossils and the Antiquity Act

Fossils are not considered historic resources, unless they are an artifact or hold cultural significance to a Native American Tribe. Current Air Force guidelines do not require the identification, collection, analysis, or management of fossil resources; however, the newest draft of AFI 32-7065 includes them as a resource requiring protection under the Antiquity Act (Mark Stanley, personal communication 2014)

The Antiquity Act was the first law passed in the U.S. to protect cultural resources. The Act allowed the Secretary of the Interior to issue permits for the excavation of ruins and archaeological sites and the collection of objects of antiquity on Federal lands and allowed the President to designate important resources as national monuments. More recent laws are typically used in place of the Act (except for national monument designation); however, the pending AF 32-7065 guidelines interpret the law to include fossils as “objects of antiquity”.

If this guidance is accepted, individuals wishing to collect or excavate fossils on Air Force bases must obtain a permit for this type of research. The permit seeker must prove that he or she is associated with a scientific or educational institution and that the work will be used to increase the public knowledge and understanding of such objects. Issuance of a permit for fossil gathering activities should follow the same procedures as ARPA until the Air Force clearly defines their stance on such items. All collected objects are considered property of the Federal government, and must be returned to the Hurlburt Field CRM after the analysis is complete. All other gathering, removal, or selling of fossilized remains found on Hurlburt Field is prohibited.

3.9 Consultation Procedures

Frequent communication and consultation with various internal and external stakeholders is required by all of the compliance procedures in this chapter. Appendix D describes the roles and responsibilities of each of these stakeholders, and Appendix C provides the names and contact information for the officials who should be consulted during compliance procedures. The procedures for consulting with these stakeholders are described below and in the applicable SOPs.

3.9.1 Consultation with Native American Tribes

Hurlburt Field currently consults with four Federally-recognized Native American Tribes (the Miccosukee Indian Tribe, the Seminole Tribe of Florida, the Seminole Nation of Oklahoma, and the Poarch Band of Creek Indians) regarding their ancestral interests on the base. The base is also recommended to begin consultation proceedings with the Thlopthlocco Tribal Town and the Muscogee (Creek) Nation of Oklahoma (See Chapter 2).

Consultations with Federally-recognized Native American Tribes are considered government-to-government consultations, which require participation by the installation commander. The procedure for this type of consultation is described in SOP 2. Training in government-to-government consultation is highly recommended for the Hurlburt Field CRM, who serves as an advisor to the installation commander or the commander's delegated representative during these consultations.

Consultation with the SHPO and the ACHP

A good working relationship with the SHPO can often expedite the Section 106 process, and allow for more informal consultations and requests for advice and professional guidance. Consultations with the SHPO are typically performed by the Hurlburt Field CRM, and official consultations (i.e., review of adverse effect) are always in written form. The Hurlburt Field CRM is encouraged to continue the excellent working relationship they have already developed with the Florida SHPO.

Consultation with Eglin and the IST

As the host unit of the 1 SOW and the land manager of Hurlburt Field, Eglin AFB has a responsibility to evaluate undertakings that may adversely affect the land or trees located within the Hurlburt Field boundaries. Informal arrangements were made in the mid-1990s to divide the NHPA responsibilities for Hurlburt Field between the two CRM programs (Appendix B). Unfortunately, these arrangements were never solidified in a formal agreement, and some confusion has arisen over the years regarding the individual responsibilities of each program.

Hurlburt Field and Eglin AFB are strongly encouraged to develop an agreement document that specifies exactly how these responsibilities will be addressed in the future. Until this can be developed, SOP 1 has been included in this document to specify when and how consultation between the two bases should occur. The IST should be involved in these consultations, and can act as a liaison between the two bases.

Consultation with the Public and Other Interested Parties

Official consultations with the public should be conducted through the Public Affairs Office, which can assist in posting notices and fielding responses from the public for Section 106 undertakings. Local museums, historians, archaeological societies, and interest groups can be valuable assets for identifying and protecting cultural resources and promoting educational awareness and outreach about the cultural resources located on Hurlburt Field. The Hurlburt Field CRM is encouraged to strengthen and develop their relationships with the local communities and the civilian and military populations.

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Standard Operation Procedure No. 1

Consultation with Eglin Air Force Base

Contacts

Hurlburt Field Cultural Resources Program Manager

1 SOCES/CEIE

415 Independence Rd., Bldg. 90053

Hurlburt Field, FL 32544

Phone: 850-884-7916

Eglin Cultural Resources Program Managers

CEIEA, 602 West D Ave (Building 238)

Eglin Air Force Base, FL 32542

Phone: 850-882-5201 (Architecture)

Phone: 850-883-5222 (Archaeology)

Installation Support Team, Cultural Resources SME

Phone: 850-882-8459

Scope

Standard Operation Procedure No. 1 outlines the procedure to follow when initiating and conducting consultation with Eglin Air Force Base. Eglin AFB retains certain responsibilities for ensuring that undertakings involving land or timber on Hurlburt Field comply with the Federal, State, and Military regulations regarding cultural resources. To meet this requirement, Hurlburt Field and Eglin AFB must consult on a regular basis regarding these undertakings. An agreement document can be created and implemented at the installation level to streamline this consultation procedure. Until this occurs, the procedures described in this SOP should be followed.

Statutory Reference(s) and Guidance

- *Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, as amended, and it's implementing regulation 43 Code of Federal Regulations (CFR) 10*
- *Archaeological Resources Protection Act (ARPA) of 1979 (16 USC 470AA-MM)*
- *American Indian Religious Freedom Act (AIRFA) of 1978, as amended (42 United States Code [USC] 1996 and 1996a)*
- *National Historic Preservation Act (NHPA) of 1966, as amended, and it's implementing regulation 36 CFR 800*

- *National Environmental Protection Act (NEPA) of 1969, and its implementing regulation, 36 CFR 805*

Applicability

Actions or discoveries that may trigger these requirements include, but are not limited to:

- Issuance of an ARPA permit
- Historic preservation and Section 106 activities
- Section 110 responsibilities and activities

Roles and Responsibilities

| | |
|--|---|
| Hurlburt Field CRM | <ul style="list-style-type: none"> • Provides data for EIAP review • Acts as lead agency for consultations |
| Installation Support Team (IST) | <ul style="list-style-type: none"> • Responsible for mediating consultation • Initiates consultation and acts as lead agency for undertaking affecting multiple bases |
| Eglin AFB CRM | <ul style="list-style-type: none"> • Provides data for EIAP review • Acts as lead agency for consultations |

Procedure

1. Data sharing

Each installation is responsible for producing GIS layers documenting their resource inventory and their Section 110 and Section 106 investigations. Eglin AFB CRMP and the Hurlburt Field CRMP should arrange to exchange these data layers on an annual basis, or as needed, to ensure that both bases have current information to meet the requirements of this SOP.

2. Initiating Consultation

The Hurlburt Field CRM should initiate contact with the Eglin AFB CRM when an undertaking, either proposed by a proponent associated with Hurlburt Field or using funds allocated to Hurlburt Field, will adversely affect cultural resources located on Eglin AFB or the property managed by Eglin AFB.

The Eglin AFB CRM should initiate contact with the Hurlburt Field CRM when an undertaking, either proposed by a proponent associated with Eglin AFB or using funds allocated to Eglin AFB, will adversely affect cultural resources located on Hurlburt Field.

Consultations for undertakings that will affect resources on both bases should be initiated and coordinated through the IST.

3. Consultation Proceedings

The association of the project proponent or funds generally determines which installation acts as the lead agency during the consultation proceedings. However, Eglin AFB retains host responsibilities over the land and timber of Hurlburt Field so the Eglin AFB CRMP should act as the lead agency for any projects that impacts these resources.

Consultation proceedings should follow the process described in Section 106 of the NHPA, and any stipulation specified in relevant agreement documents. The CRM of the lead agency is responsible for ensuring that this occurs, and that the other installation is invited to fully participate in the process.

The Section 106 process should be fully integrated with the EIAP. The lead agency should work with the appropriate installation NEPA coordinator to ensure that this occurs.

Any agreement documents resulting from the Section 106 process should be signed by both installations. Consultations and signing of agreement documents can be coordinated and mediated through the IST, and the IST can act as the lead agency for projects that affect multiple bases or where the identity of the lead agency is contested.

Standard Operation Procedure No. 2

Consultation with Native American Tribes

Contacts

Hurlburt Field Cultural Resources Program Manager
1 SOCES/CEIE
415 Independence Rd., Bldg. 90053
Hurlburt Field, FL 32544
Phone: 850-884-7916

Installation Support Team, Cultural Resources SME
Phone: 850-882-8459

Hurlburt Field currently consults with four Federally-recognized Native American Tribes and has previously consulted with one State-recognized Native American Tribe. The contact information for these tribes can be found in Appendix C.

Scope

Standard Operation Procedure No. 2 outlines the procedure to follow when initiating and conducting consultation with Native American Tribes. Consultation with the Tribes is considered a government-to-government (GTG) consultation, and should involve the installation commander or the commander's delegated representative. Agreement documents (MOUs and CAs) can be created and implemented at the installation or IST levels to streamline the consultation procedure. The procedures described in this SOP should be followed until Hurlburt Field develops these types of agreements.

Statutory Reference(s) and Guidance

- *Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, as amended, and it's implementing regulation 43 Code of Federal Regulations (CFR) 10*
- *Archaeological Resources Protection Act (ARPA) of 1979 (16 USC 470AA-MM)*
- *American Indian Religious Freedom Act (AIRFA) of 1978, as amended (42 United States Code [USC] 1996 and 1996a)*
- *National Historic Preservation Act (NHPA) of 1966, as amended, and it's implementing regulation 36 CFR 800*
- *Executive Order 13007 - Indian Sacred Sites*
- *Executive Order 13175 - Consultation and Coordination with Indian Tribal Governments (6 November 2000)*

- *Presidential Memorandum - Government-to-Government Relations with Native American Tribal Governments (29 April 1994)*
- *Department of Defense (DoD) Instruction 4710.02: DoD Interactions with Federally-Recognized Tribes*
- *Department of Defense Plan of Action to Implement the Policies and Directives of Executive Order 13175, Consultation and Coordination with Indian Tribal Governments. January 2010.*

Applicability

Actions or discoveries that may trigger these requirements include, but are not limited to:

- Issuance of an ARPA permit
- Historic preservation and Section 106 activities
- Discovery or repatriation of NAGPRA remains or cultural items
- Matters that significantly or uniquely affect tribal communities or other interested parties
- Access, use, and protection of sacred sites or traditional cultural properties
- Creation and implementation of procedural agreement documents

Roles and Responsibilities

| | |
|---|---|
| Hurlburt Field CRM and/or IST | <ul style="list-style-type: none"> • Develops an active consultation program. • Continues or maintains consultation with each tribe • Identifies consulting tribes. • Develops plans to contact tribes & presents plans and protocols to the base commander. • Plans for or assists in GTG meetings. • Documents & files meeting/communication records. • Develops implementation of action items with tribes. • Consults for specific actions (i.e., Section 106). |
| Base Commander | <ul style="list-style-type: none"> • Responsible for and initiates GTG consultations with tribes. • Determines roles & responsibilities of CRM. • Represents AF in high visibility/controversial/precedent-setting matters concerning the installation. • Plans & attends GTG meetings. • Maintains relationships with the Tribal officials/THPO/representatives. • Designates representatives and working contacts for routine consultations. |
| Tribal Government Official or THPO | <ul style="list-style-type: none"> • Decides to accept/decline/initiate relationship with the base. • Plans and attends GTG meetings. • Maintains relationship with base officials and representatives. • Designates representatives & contacts for routine staff-level consultation. |

Procedure

1. Identify affiliated Native American Tribes

Affiliated Tribes are identified by conducting ethno-historic studies to identify the Native Americans who lived or had ancestral interests in the base area. These studies should include a review of historic maps, records, legal documents, ethnographic accounts, and other documents to reconstruct the historic usage of the area. Research of this kind was conducted for Hurlburt Field in the 1980s as part of Eglin AFB and Hurlburt Field's HPP (Thomas and Campbell 1993). However, this summary should be reviewed and updated periodically to reflect new research and information.

If the Tribes are contacted as a part of this update, the researcher or CRM should clearly state that the contact is to determine ancestral interests, and does not constitute an invitation to consult with the base. The document produced by this update should summarize the evidence for ancestral Tribal interests, and include a map showing the affiliations linked to the installation's lands.

2. Develop and present a plan to contact the tribes

The IST or CRM should develop a base plan for initiating contact with the Tribes identified by the research. The plan should clearly state the base's objectives for the relationship, the plans for initiating contact, any future goals for the relationship (i.e., establish agreement documents), and any training the Air Force staff should receive before making contact. After developing the document, the CRM and/or IST presents the plan to the base leadership for review and approval.

3. Initiate government-to-government contact

Once the plan is approved, the Base Commander sends a letter to each tribe highlighting the installation's intentions to establish GTG consultations. The letter will invite the tribe(s) to meet with the Base Commander at the installation or another location, and the Commander should offer to visit the tribe(s)'s offices.

If no response is received from the tribe(s) within sixty days, the IST or CRM should follow-up the letter with a phone call to the THPO or Tribal representative to confirm the Tribe's interests. Some tribal leaders may request a follow-up phone call from the Base Commander, which should be arranged by the CRM or IST through the proper channels.

4. Plan and hold GTG meeting(s)

The CRM and IST should plan and arrange funding for the meeting between the Base Commander and the Tribes. Planning of the meeting should anticipate all of the potential needs for the event, including the agenda, meeting location and facilities, transportation and lodging arrangements, food preferences, gifts, specific greeting and speaking protocols, and a time of year that works for all parties. Some Tribes may desire to meet individually with the Commander, in which case, multiple meetings should be planned. Tribal invitees typically expect to be supported, to some degree, in their travel, meals, and lodging expenses for such meetings, and many installations pay directly for one or two tribal representatives to attend GTG meetings. Another option, which is often more time-saving and cost-efficient, is to contract a private firm to facilitate the meeting logistics and the travel support.

The agenda of the meeting should be focused towards achieving a desired outcome (i.e. establish relationships, development of agreement documents, etc.), but should not be structured to the point of inflexibility. Discussions during the meeting should clearly identify resources of interest to the Tribes, and when consultation should be conducted, even when an agreement document has not been developed or signed. Often GTG meetings include a “listening time” when the tribal leadership can express their thoughts on the meeting, the past, the installation, or any other subject to the Base Commander. Veterans or active military members, representing various DoD branches, often attend as tribal guests, and efforts should be made to recognize these individuals and their service to the Nation. If arrangements are made to hold the meeting on the installation, the agenda should include the opportunity to visit some of the cultural resource sites on the base that may be of interest to the Tribes.

5. Implement meeting outcome and maintain consultation with the affiliated Tribes

After the GTG consultations, the Base Commander will notify the CRM of his/her roles and responsibilities for future consultations and communications with the Tribes. The CRM is typically responsible for conducting the ongoing tribal consultation program, implementing the goals of the meeting (i.e., planning and developing a MOU), and tracking and archiving the records and documents resulting from any Tribal consultations or meetings. The CRM should also update the ICRMP to reflect any new policies regarding tribal consultations, and any new agreement documents signed by the base commander.

Standard Operation Procedure No. 3

Inadvertent Discovery of Artifacts or Human Remains

Contacts

Hurlburt Field Cultural Resources Program Manager, 1 SOCES/CEIE
415 Independence Rd., Bldg. 90053
Hurlburt Field, FL 32544
Phone: 850-884-7916

Installation Support Team, Cultural Resources SME
Phone: 850-882-8459

Scope

Standard Operation Procedure No. 3 outlines the procedure individuals, units, or agencies (other than the Hurlburt Field CRMP) should follow when artifacts or human remains are inadvertently discovered during activities or undertakings on Hurlburt Field. Artifacts are considered to be any object, older than fifty years of age, which was modified, manufactured, consumed, or disposed of by a person. Human remains may be in various states of decomposition so any bones suspected to be human should be treated as such. Any individual, organization, or unit who encounters suspected artifacts or human remains should follow the procedures in this SOP.

Statutory Reference(s) and Guidance

- *Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, as amended, and it's implementing regulation 43 Code of Federal Regulations (CFR) 10*
- *Archaeological Resources Protection Act (ARPA) of 1979 (16 USC 470AA-MM)*
- *American Indian Religious Freedom Act (AIRFA) of 1978, as amended (42 United States Code [USC] 1996 and 1996a)*
- *National Historic Preservation Act (NHPA) of 1966, as amended, and it's implementing regulation 36 CFR 800*
- *Executive Order 13007 - Indian Sacred Sites*
- *Presidential Memorandum - Government-to-Government Relations with Native American Tribal Governments (29 April 1994)*
- *Florida Administration Code 1A-44 - Procedures for Reporting and Determining Jurisdiction over Unmarked Human Burials*

- *Florida Statute Chapter 872 - Offenses Concerning Dead Bodies and Graves*

Applicability

Actions or discoveries that may trigger these requirements include, but are not limited to:

- Field training exercises
- Infrastructure maintenance and construction
- Ground-disturbing activities such as digging, bulldozing, clearing or grubbing
- Off-road vehicular use
- General observations (i.e., eroded areas, gullies, trails, etc.).
- The discovery of bones or human remains
- The discovery of unmarked graves
- The discovery of archaeological materials or features
- The discovery of paleontological remains.

Roles and Responsibilities

| | |
|--------------------------------|---|
| Discoverer | <ul style="list-style-type: none"> • Notes the location of the discovery and ceases all activities in the area • Secures the area with a 50 m (164 ft) perimeter • Contacts the Hurlburt Field CRM |
| Hurlburt Field CRM | <ul style="list-style-type: none"> • Responds to the report of an inadvertent discovery • Seeks the assistance of the IST • Determines and executes appropriate measures to fulfill legal mandates |
| Mission Support Offices | <ul style="list-style-type: none"> • Include this SOP in all contracts and range use packages. |

Procedure

If artifacts are discovered:

1. Note the location of the discovery and cease all activities in the immediate area.
2. Secure the discovery by establishing a 50 meter (164 foot) perimeter around the location.
3. Contact the Hurlburt Field CRM to report the discovery.
4. The Hurlburt Field CRM will contact the IST for assistance, and visit the location to determine what legal mandates are applicable.
5. Activities will not resume within the secured perimeter until the Hurlburt Field CRM clears the location of all concerns.

If human remains or bones are discovered:

1. Note the location of the discovery and cease all activities in the immediate area.
2. Secure the discovery by establishing a 50 meter (164 foot) perimeter around the location.
3. Contact the Hurlburt Field CRMP to report the discovery.

4. The Hurlburt Field CRM will contact the IST for assistance, and visit the location to determine what legal mandates are applicable.
5. Activities will not resume within the secured perimeter until the Hurlburt Field CRM clears the location of all concerns.

Standard Operation Procedure No. 4

ARPA Enforcement

Contacts

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Hurlburt Field, FL 32544
Phone: 850-884-6423

Scope

Standard Operation Procedure No. 4 outlines the procedures to follow when reporting, documenting, and prosecuting an ARPA violation. Violations include selling, purchasing, exchanging, excavating, removing, damaging, altering, or defacing archaeological resources from Hurlburt Field, which are 100 years of age or older, or attempting to pursue these activities or hire individuals to do so. Violators of ARPA can be fined up to \$100,000 or imprisoned up to five years for each offense.

Statutory Reference(s) and Guidance

- *Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, as amended, and its implementing regulation 43 Code of Federal Regulations (CFR) 10*
- *Archaeological Resources Protection Act (ARPA) of 1979 (16 USC 470AA-MM)*
- *American Indian Religious Freedom Act (AIRFA) of 1978, as amended (42 United States Code [USC] 1996 and 1996a)*
- *National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulation 36 CFR 800*
- *Executive Order 13007 - Indian Sacred Sites*
- *Presidential Memorandum - Government-to-Government Relations with Native American Tribal Governments (29 April 1994)*

- *Florida Administration Code 1A-44 - Procedures for Reporting and Determining Jurisdiction over Unmarked Human Burials*
- *Florida Statute Chapter 872 - Offenses Concerning Dead Bodies and Graves*

Applicability

Actions or discoveries that may trigger these requirements include, but are not limited to:

- Observation of illegal activities
- Evidence of illegal activities (i.e., looting holes, defacement of tombstones)

Roles and Responsibilities

| | |
|---|---|
| Hurlburt Field CRM/IST/Archaeologist | <ul style="list-style-type: none"> • Confirms violation • Assists with documenting and prosecuting violation • Write damage assessment report • Notifies installation commander and SHPO of violation • Develops and consults on stabilization and treatment methods • Updates annual reports and ICRMP as needed |
| Security Forces | <ul style="list-style-type: none"> • Documents evidence and crime scene • Interviews/interrogates witnesses and suspects • Acquires search warrants • Writes case report |
| U.S. Attorney's Office | <ul style="list-style-type: none"> • Prosecutes case |

Procedure

Individuals wishing to report evidence of an ARPA violation should contact the Hurlburt Field CRM. Ongoing illegal activities should be observed from a safe distance, and immediately reported to Hurlburt Field Security Forces

1. Confirm a Violation

The Hurlburt Field CRM should verify any reported violation by visiting the archaeological resource. The site should be considered a potential felony crime scene, and precautions should be taken to avoid disturbing or damaging evidence. Entry to the site should cover the shortest distance possible, and should not use the same route as the perpetrators or cross any footprints or tire tracks. The CRM should use previously-recorded monitoring information to confirm whether a violation has occurred (Appendix F), and should exit the area using the entry route. The CRM should seek assistance from the IST if a professional archaeologist is needed to make a determination.

If illegal activities are in progress, the CRM should immediately contact Security Forces from a safe distance. The CRM should not confront the individuals or enter the area; however, he/she should document the physical description of the individual(s), the activities, and take photographs (if possible) while awaiting law enforcement.

2. Secure the Area

If a violation is confirmed, the Hurlburt Field CRM should secure the area and contact Security Forces and the IST (if not contacted previously). The CRM should not leave the area or allow anyone else to access the area until Security Forces arrive.

3. Document the Scene

The CRM, IST, and/or a professional archaeologist may be required to assist Security Forces in documenting the scene, especially if an ARPA-trained officer or CLEO is not available. Documentation by the SF should include:

- Recording environmental conditions
- Photographing evidence before and after it is marked as evidence
- Recording and mapping evidence
- Sketching the crime scene
- Measuring, assessing, and photographing damage
- Conducting witness or suspect interviews or interrogations

The CRM, IST, and/or archaeologist should collect, record, and log any significant or diagnostic surface artifacts, not considered evidence, to prevent theft.

The CRM, IST, or a professional archaeologist should also be named as “Master” on any search warrants associated with the violation so that SF can use their knowledge of local history and archaeology to identify items which may have been taken from the site or its neighbors.

4. Notification and Consultation

The Hurlburt Field CRM should notify, through the chain-of-command, the installation commander within 48 hours of learning of the violation. The CRM should follow-up this notification with a written report within five working days of the violation. The report should contain:

- Circumstances of the site damage, including how and when the damage was discovered, when it occurred, and who was responsible
- Assessment of the nature and extent of the site damage, including first-hand observations made by the CRM/IST/archaeologist, with reference to site conditions documented prior to the damage.
- Descriptions of all actions taken by the CRM or others to protect the site, protect the evidence, and record when and how SF was notified.

- Response and recommendations of SF
- Recommendations for treatment of the damaged site
- Suggestions to avoid damage to other sites potentially threatened by similar circumstances.

The CRM must also notify the SHPO within five working days of the violation to initiate treatment consultation. Depending on the damage, the stage of the investigation, and whether arrest are forthcoming, options such covering of the site may need to be delayed to allow the defense attorneys time to review the scene and the related evidence. Legal review may also be necessary before initiating treatment.

5. Prepare the Damage Assessment and Case Report

The CRM/IST/professional archaeologist should provide technical expertise to assist SF in preparing the case report. The report should contain the sketches, maps, photographs, and information gathered during the crime scene investigation as well as a factual, sequential, account of events surrounding the commission of the crime. The report also should include an executive summary, annotated summaries of interviews and taped recordings, charges to be filed, any pertinent observations, and conclusions based on the evidence and information.

The damage assessment is prepared by the archaeologist, and should be included as a part of the case report. The assessment records the site's current condition and NRHP eligibility, and determines the costs to examine the damage, stabilize the damage, and restore and/or repair the site to its pre-violation condition. The damage assessment report is used by the judge to determine the appropriate fines or jail time if any parties are found guilty of the crime.

6. Prepare and Present the Case

The U.S. Attorney's Office prosecutes all ARPA cases for the Federal government. The Hurlburt Field CRM, IST, or professional archaeologist may be called to present an eyewitness account, act as an expert witness, or assist with the case prep. Perpetrators of ARPA are often prosecuted under other legislation as well, including 18 USC 371 Conspiracy to Commit Offense or Defraud the U.S. Government.

7. After the Case

All artifacts will be returned to Hurlburt Field after the case is closed. The CRM updates all relevant data calls and the ICRMP, and curates the artifacts and documents from the ARPA violation and the damage treatment, as required by 36 CFR 79.

Standard Operation Procedure No. 5

Compliance Procedures for Declared Emergencies and Disasters

Contacts

Hurlburt Field Cultural Resources Program Manager
1 SOCES/CEIE
415 Independence Rd., Bldg. 90053
Hurlburt Field, FL 32544
Phone: 850-884-7916

Installation Support Team, Cultural Resources SME
Phone: 850-882-8459

Scope

Standard Operation Procedure No. 5 outlines the procedures to follow before and after a declared natural disaster or emergency situation.

Statutory Reference(s) and Guidance

- *Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, as amended, and its implementing regulation 43 Code of Federal Regulations (CFR) 10*
- *Archaeological Resources Protection Act (ARPA) of 1979 (16 USC 470AA-MM)*
- *National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulation 36 CFR 800*
- *36 CFR 78, Waiver of Federal Agency Responsibilities under Section 110 of the NHPA*
- *36 CFR 800.12, Emergency Situations*

Applicability

Events that trigger these requirements include, but are not limited to:

- Federally-declared natural disasters or emergency situations
- State-declared natural disasters or emergency situations
- Declared-disaster clean-up

Roles and Responsibilities

| | |
|-------------------------------|---|
| Hurlburt Field CRM | <ul style="list-style-type: none"> • Prepares the CRMP for imminent disasters. • Secures the program’s data, files, and equipment. • Requests expedited Section 106 review • Conducts post-disaster damage assessment and • Develops and implements stabilization and mitigation plans |
| IST | <ul style="list-style-type: none"> • Seeks funding for post-disaster stabilization, mitigation, and evaluation. • Provide technical expertise and support as needed |
| Installation Commander | <ul style="list-style-type: none"> • Requests waiver of Section 110 responsibilities • Participates in Section 106 consultations, as required |
| Real Property Office | <ul style="list-style-type: none"> • Works with the CRM to assess damages to buildings and structures. • Updates building condition and eligibility status in the real property inventory records. |

Procedure

Disaster Preparation

1. Keep emergency responders informed about cultural resources concerns

AFI 32-7065 3.8.1.2 requires archaeological sites to be indicated, but not specifically located, on real property records and appropriate installation maps and plans. This information should be available to emergency responders and other safety and environmental groups through the EIAP website or another accessible location. The Hurlburt Field CRM is responsible for ensuring that this information is kept up-to-date, and is available for emergency response planning and activities.

2. Include cultural resources preservation measures into emergency plans and training activities.

Emergency responders should work with the Hurlburt Field CRM to incorporate cultural resources preservation measures into their emergency plans and training activities.

3. Create an emergency data kit

The Hurlburt Field CRM may need to respond to the aftermath of a disaster without access to a computer, Internet, electricity, or a telephone. In order to prepare for this possibility, the Hurlburt Field CRM should periodically back-up to a DVD or print information (i.e., contact info, resource maps, archaeological site conditions, and building inventory) that may be needed to expedite Section 106 reviews after a disaster. The CRM should secure this information in a location that will be accessible after the disaster, or bring it with her/him during an evacuation. Equipment, such as cameras and GPS units, that may be needed after the disaster should also be secured or removed from the threat area.

4. Secure files and computers

The Hurlburt Field CRM should follow all installation procedures for securing and protecting the program's files and electronic data. These procedures may require draping computers in plastic, securing windows with plastic and duct tape, or other measures.

5. Request waiver of Section 110 responsibilities

The installation commander can request a waiver of Section 110 responsibilities for the installation before an imminent disaster if emergency actions to preserve human life and property will be impeded by the need to meet Section 110 requirements. The waiver form must be submitted by the commander to HQ USAF/A7CA. The Secretary of the Air Force may decide to waive Section 110 responsibilities for an installation, region, or the entire Air Force without a specific request. Any issued waivers cannot exceed the period of the declared emergency.

Post Disaster Clean-Up

1. Waive Section 106 responsibilities

Immediate rescue and salvage operations conducted to preserve life or property are exempt from Section 106 review [36 CFR 800.12(d)]

2. Request expedited Section 106 review

Section 106 review can be expedited for post-disaster clean-up that will adversely affect cultural resources. The Hurlburt Field CRM should seek comment from the ACHP, SHPO, and Native Tribes (if appropriate) for any emergency-driven undertakings. Comment should be sought using the Section 106 procedures described in Chapter 3, but the ACHP, SHPO, and Tribes only have seven days to review and provide comment on the undertaking and the proposed mitigation measures.

3. Fulfill ARPA and Section 110 responsibilities

The Hurlburt Field CRM, with the assistance of a professional archaeologist, should monitor the condition of all of the sites (Appendix F) that may have been impacted by the disaster, and develop measures with the SHPO for mitigating or stabilizing impacted sites. Evaluative testing to update the NRHP eligibility status of some sites may also be required. The Hurlburt Field CRM should work with the IST to acquire funding for post-disaster testing, mitigation, or stabilization measures.

4. Assess Architectural Resources

The Hurlburt Field CRM should work with the Real Property Office to assess and document damage to the historic architectural resource inventory. Immediate repairs and restoration of buildings and structures can be addressed through the expedited Section 106 process (#2 above). The Hurlburt Field CRM should work with the IST, as needed, to acquire funding for post-disaster eligibility evaluations.

Standard Operation Procedure No. 6

Compliance Procedures for Undeclared Emergencies and Disasters

Contacts

Hurlburt Field Cultural Resources Program Manager
1 SOCES/CEIE
415 Independence Rd., Bldg. 90053
Hurlburt Field, FL 32544
Phone: 850-884-7916

Installation Support Team, Cultural Resources SME
Phone: 850-882-8459

Scope

Standard Operation Procedure No. 6 outlines the procedures to follow before and after an undeclared natural disaster or emergency situation. Undeclared disasters are often localized to a specific area (i.e., chemical spill) and have a more limited, immediate response than declared emergencies. Emergency responders should follow the procedures in this SOP to incorporate cultural resource preservation into their emergency plans and training activities.

Statutory Reference(s) and Guidance

- *Native American Graves Protection and Repatriation Act (NAGPRA) of 1990, as amended, and its implementing regulation 43 Code of Federal Regulations (CFR) 10*
- *Archaeological Resources Protection Act (ARPA) of 1979 (16 USC 470AA-MM)*
- *National Historic Preservation Act (NHPA) of 1966, as amended, and its implementing regulation 36 CFR 800*

Applicability

Events that trigger these requirements include, but are not limited to:

- Chemical spill
- Vehicular or aircraft crashes
- Structural fires or flooding
- Wildfires, floods, tornados, and other natural disasters
- Fuel dumps or drops

Roles and Responsibilities

| | |
|-----------------------------|--|
| Hurlburt Field CRM | <ul style="list-style-type: none"> Keeps emergency responders informed about cultural resources concerns. Implements the Section 106 process for post-disaster clean-up undertakings. Documents damage and implements mitigation measures for cultural resources impacted by the disaster or the disaster response. |
| Emergency Responders | <ul style="list-style-type: none"> Acquires locational information for cultural resource concerns. Includes cultural resource preservation measures into emergency response plans and training activities. Avoids or minimizes impacts to cultural resources during the disaster and the post-disaster clean-up. |
| IST | <ul style="list-style-type: none"> Seeks funding for post-disaster stabilization, mitigation, and evaluation. Provides technical expertise and support as needed |
| Real Property Office | <ul style="list-style-type: none"> Works with the CRM to assess damages to buildings and structures. Updates building condition and eligibility status in the real property inventory records. |

Procedure

Disaster Preparation

1. Keep emergency responders informed about cultural resources concerns

AFI 32-7065 3.8.1.2 requires archaeological sites to be indicated, but not specifically located, on real property records and appropriate installation maps and plans. This information should be available to emergency responders and other safety and environmental groups through the EIAP website or another accessible location. The Hurlburt Field CRM is responsible for ensuring that this information is kept up-to-date, and is available for emergency response planning and activities.

2. Include cultural resources preservation measures into emergency plans and training activities.

Emergency responders should work with the Hurlburt Field CRM to incorporate cultural resources preservation measures into their emergency plans and training activities.

Disaster Response

1. Avoid cultural resource concerns, if possible

The immediate concern of emergency responders should be preserving life and property and maintaining their personal safety. During a disaster situation, emergency personnel should attempt to avoid or minimize the impacts of their activities on cultural resource concerns. Inadvertent discoveries or damage to cultural resources as a result of rescue and salvage activities should be reported to the Hurlburt Field CRMP when it is safe to do so (see SOP 3).

Post Disaster Clean-Up

1. Section 106 review for post-disaster clean-up

Post-disaster clean-up activities will require review through the Section 106 process. The Hurlburt Field CRM should work with the SHPO and Tribes (if required) to try to expedite the consultation for these undertakings; however, none of the consulting parties are legally required to shorten their review period, unless otherwise specified in an agreement document.

2. Section 110 responsibilities for post-disaster clean-up

The Hurlburt Field CRMP is required to document any damage to cultural resources resulting from the disaster or the disaster response, and to develop and implement stabilization, mitigation, or evaluation measures of the resource(s) in response to the impacts. The Hurlburt Field CRM should use the monitoring strategies described in Appendix F, and work with the IST to acquire funds to document the damage and implement an appropriate response. The Hurlburt Field CRM should also work with the Real Property Office to update their records and develop an appropriate response if historic buildings or structures are damaged or destroyed by the disaster.

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Appendices

Appendix A Relevant Legislation and Regulations

Appendix B Agreement Documents

Appendix C Contact Information for Consulting Parties

Appendix D Stakeholder Roles and Responsibilities

Appendix E The Five Year Plan

Appendix F Site Monitoring

On the attached CD:

Appendix G Curation Procedures and Inventory

Appendix H Historic Context

Appendix I Resource Inventory Forms and Descriptions

Appendix J Resource Maps

Appendix K Management Plans