

Nellis Air Force Base (NAFB) is initiating consultation under Section 106 (54 U.S.C. § 306108) of the National Historic Preservation Act of 1966 (as amended) on a federal undertaking to remediate areas within the Nellis Small Arms Range (NSAR) contaminated with lead and polycyclic aromatic hydrocarbons (PAH). The selected remedies for these areas were chosen in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA), as amended by the Superfund Amendments and Reauthorization Act of 1986, and variously include munitions clearance, targeted mechanical scraping and excavation, grading, and the construction of diversion berms and a sediment detention basin.

The direct area of potential effects (APE) for the undertaking is northwest of the Lamb Blvd. exit off of the 215 Beltway. It includes the areas where the selected remedies will take place, unimproved access roads and bed-down areas, as well as an 800-meter buffer for visual, auditory, atmospheric, and cumulative effects. The APE for physical effects comprises a total of approximately 535.5 acres. An 800-meter buffer was chosen for visual, auditory, and atmospheric effects, since auditory and atmospheric effects are expected to be minimal and temporary and visual impacts are limited to—at most—removal or construction of earthen berms. The two berms to be constructed will measure approximately 700 feet long, 6 feet wide at the base, 2 feet wide at the top, and 2 feet high, and will be composed of local soil and gravel. Since the surrounding landscape contains dozens of berms, coppice dunes, and washes, along with creosote, bursage, and scrub brush, it is likely that any visual impacts from the undertaking would be negligible beyond the 800-meter buffer. Foreseeable cumulative effects primarily include altered patterns and rates of erosion due to the construction and removal of berms. These effects would be downslope of the causative actions, terminating at the proposed detention basin, which is within the 800-meter buffer.

A pedestrian inventory of the physical APE was completed by Chronicle Heritage, LLC, a review of which is being requested by NAFB under 36 C.F.R. § 800.3(c)(4). Chronicle Heritage identified seven new historic-era archaeological sites (WWII, Korean, and Vietnam-era) and updated two previously recorded sites within the physical APE of the undertaking, along with one isolated find. NAFB determined that three sites are eligible for the National Register of Historic Places (NRHP) under Criterion A, five sites are not eligible under any criterion, and one small segment of a previously recorded site is non-contributing to the eligibility of the site (see Table 1 below). The isolated find is not eligible for inclusion in the NRHP. In addition to these resources, Chronicle also identified a site (26CK11364) recorded by Logan Simpson as part of the Greenlink West Cultural Resources Inventory. This site is a historic glass scatter located directly east of Gass Peak Road, which was recommended not eligible for NRHP listing by Logan Simpson. Per email communication with NAFB, the Bureau of Land Management (BLM) indicated that they consulted with SHPO on sites located on Department of Defense (DoD) lands in May of 2023 and again in February of 2024 with no responses from SHPO. In accordance with 36 C.F.R. 800.3(c)(4), this is in effect a default concurrence, and 26CK11364 is therefore not eligible.

**Table 1.**

<b>Site Number</b>	<b>Description</b>	<b>NAFB NRHP Determination</b>
26CK4803 (update)	WWII Gunnery School Moving Target Range	Non-contributing segment
26CK7856 (update)	Trash scatter	Not eligible
26CK11617	WWII Trap Shooting Range	Not eligible
26CK11618	Known Distance Range	Not eligible
26CK11619	WWII Moving Base Shotgun Range - West	Eligible; Criterion A
26CK11620	WWII Moving Base Shotgun Range - East	Eligible; Criterion A
26CK11621	WWII Skeet Range	Eligible; Criterion A
26CK11622	Road and paved circular pad	Not eligible
26CK11623	Gass Peak Road	Not eligible

NAFB does not agree with the contractor recommendation that site 26CK11621 is also eligible under Criterion D. This recommendation was based on the assumption that depressions within two features are partially infilled latrine pits, and that potential cultural deposits therein "...could yield valuable information to answer questions important to the history of the WWII base and how the trainees lived and adapted to the hot conditions in the southern Nevada desert as well as other identifying personal information." The actual character of the depressions is currently unknown; however, even assuming that they were in fact latrines, NAFB does not believe the data potential of possible cultural deposits rises to the requirements for NRHP eligibility under Criterion D, as outlined in National Register Bulletin (NRB) 15.

According to this guidance, information gleaned from such resources must "...have a significant bearing on a research design that addresses such areas as: 1) current data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan" (National Park Service 1997:21). Given the abundance of historical documentation of WWII-era training on the NSAR—including narrative accounts, military records, photos, and videos, it is unlikely that any artifacts found in these depressions would provide data sufficient to test hypotheses or fill data gaps. Relevant priority areas in the 2020-2028 Nevada Historic Preservation Plan include Objective B, Task VII ("Identify and interpret the influence of the military on the culture of the State..."), and Objective C, Task I ("Prioritize thematic cultural resource surveys to locate and identify resources associated with underrepresented groups...where current documentation is limited"). Regarding the former, potential latrine deposits are not likely to meaningfully contribute to our understanding of this topic. And, while it is possible that identifying personal information may be found in such archaeological contexts, it is not clear how such data would significantly challenge or augment existing documentation of the contributions of underrepresented groups to the WWII effort at Nellis (e.g., the WASP program, 370<sup>th</sup> Aviation Squadron, 972<sup>nd</sup> Quartermaster Transportation Platoon).

Based on the results of the survey, NAFB determines a finding of *Historic Properties Affected* in accordance with 36 C.F.R. 800.4(d)(2). After considering the specifics of the undertaking in the context of the characteristics of the historic properties that qualify them for

inclusion in the National Register, NAFB finds that there is *No Adverse Effect* to historic properties as defined in 36 C.F.R. 800.5(b).

The selected remedy for the area in which the eligible sites are located (26CK11619, 26CK11620, and 26CK11621) includes clearance of munitions and explosives of concern (MEC), excavation of lead-contaminated soil, removal of the primary PAH source (clay pigeon debris), final site grading, and the construction of diversion berms and a sediment detention basin. The 30 locations of lead-contaminated soil excavation in sites 26CK11619 and 26CK11620 include 28 remnants of stationary target berms (which held targets in place) and two additional areas of lead concentration. There are another four such areas within the boundaries of site 26CK11621. These areas will be excavated to the extent necessary to reduce the lead concentration below the recommended safe threshold. It is reasonable to assume that this entails complete removal of the berm remnants. As the non-berm locations include burn pits and visible residue, the area dimensions of lead removal will be the approximate lateral extent of contamination. PAH source removal will be to a depth of up to three inches below surface level. The diversion berms will be constructed of local soil removed to create the basin, and will measure approximately 700 feet long, six feet wide at the base, two feet wide at the top, and two feet high. The detention basin is expected to be an average depth of approximately one foot below surface level.

NAFB has determined that all eligible sites retain integrity of location, design, feeling, and association, but not integrity of setting, materials, or workmanship. For sites 26CK11619 and 26CK11620, integrity of design is communicated through the preservation of the roadway of the moving base range as well as the concrete footings and foundations variously representing remains of target launching platforms, bunkers, etc. These will not be removed or compromised by the remediation efforts. As noted in the report by Chronicle Heritage, the sites still evoke a sense of their historic context despite prior dismantlement, removal of superstructures, and remediation efforts—this will not change due to the current remediation initiative. While clay pigeon and shotgun shell concentrations will be removed, the structures and features that remain are those that not only communicate the design of the historic resources, but also the association with the historic events. As for site 26CK11621, the pathways and footings that create the form and design of the 16 skeet shooting courses are constructed of concrete and will not be destroyed or damaged by removal of the clay pigeon debris—nor will the utility pole stumps representing the infrastructure that powered the site. It is primarily these shooting courses that communicate both the design and the association with historic events. Removal of clay pigeon debris, shotgun shell concentrations, burn pits and ephemeral walking paths will compromise neither the site's integrity of location, design, feeling, or association.

In summary, the remediation efforts will make the sites safer for the environment and for human health, but will not compromise their integrity nor strip them of National Register values under Criterion A. Furthermore, none of the remedial actions are expected to have an adverse visual, atmospheric, auditory, or cumulative effect on eligible sites (26CK4803 and 26CK6351) within the 800-meter buffer. NAFB has therefore determined that the proposed undertaking will have no adverse effect on historic properties.

In accordance with 36 C.F.R. § 800.3(e), NAFB is inviting you to participate in consultation for this undertaking and is seeking your views so they may be considered. A similar letter will also be sent to the State Historic Preservation Office.

If you have any questions or concerns regarding this undertaking, please contact the Cultural Resources Office at Nellis Air Force Base via email at [99CES.CulturalResources@us.af.mil](mailto:99CES.CulturalResources@us.af.mil).

Yellow polygon shows location of APE including 800-meter buffer for visual, auditory, atmospheric, and cumulative effects.

