

**APPENDIX D. NATIONAL HISTORIC PRESERVATION ACT,  
SECTION 106 CORRESPONDENCES**

<b>Date</b>	<b>From</b>	<b>To</b>
April 28, 2009	Wallops Flight Facility	Virginia Department of Historic Resources
May 28, 2009	Virginia Department of Historic Resources	Wallops Flight Facility
October 9, 2009	Wallops Flight Facility	Virginia Department of Historic Resources
November 12, 2009	Virginia Department of Historic Resources	Wallops Flight Facility
July 20, 2010	Wallops Flight Facility	Assateague Island National Seashore
August 9, 2010	Assateague Island National Seashore	Wallops Flight Facility
August 11, 2010	Virginia Department of Historic Resources	Wallops Flight Facility
September 24, 2010	Telephone Log between VDHR and WFF	
November 22, 2010	Virginia Department of Historic Resources	Wallops Flight Facility
December 13, 2010	Wallops Flight Facility	Virginia Department of Historic Resources
January 10, 2011	Virginia Department of Historic Resources	Wallops Flight Facility

National Aeronautics and  
Space Administration  
**Goddard Space Flight Center**  
**Wallops Flight Facility**  
**Wallops Island, VA 23337**



April 28, 2009

Reply to Attn of: 250.W

Virginia Department of Historic Resources  
Attn: Mr. Ron Grayson  
Archaeologist, Office of Review and Compliance  
2801 Kensington Avenue  
Richmond Virginia, 23221

**Subject: Request for Study Plan Review of the NASA, Goddard Space Flight Center's Wallops Flight Facility, Wallops Island, Virginia, Proposed UAS Airstrip**

To satisfy its obligations under the National Environmental Policy Act and Section 106 of the National Historic Preservation Act, the Wallops Flight Facility (WFF) has retained the Timmons Group and New South Associates to assist with the planning for a 5,200 foot x 75 foot airstrip on the north end of Wallops Island in Accomack County, Virginia (See attached Site Vicinity Map). The preparation of an Environmental Assessment (EA) is forthcoming; however, WFF is moving forward with the early scoping process. The Unmanned Aerial Systems (UAS) Airstrip is being proposed to serve NASA and NASA partners for small-scale uninhabited aerial vehicles. The WFF invites your agency to participate in the scoping process. We are currently seeking your input and recommendations concerning WFF's proposed scope for evaluating the potential effect this project may have on cultural resources.

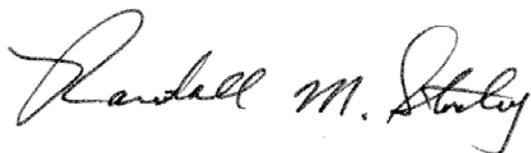
A study was previously conducted for WFF that included the current project area. The study, *Cultural Resources Assessment (CRA) of WFF, Accomack County, Virginia*, identified high sensitivity areas that would require further investigations. The purpose of the proposed investigation is to conduct a Phase I Archaeological Survey to determine if high sensitivity areas in the Area of Potential Effect (APE) contain sites that are eligible for listing on the National Register of Historic Places, and determine the effects this project may have on cultural resources. One previously identified site, 44AC0089, which is a probable Revolutionary War fort, will be investigated as part of this scope. This work is being undertaken proactively and will also be incorporated in the EA that will be prepared for this proposed action.

The UAS Airstrip at WFF is proposed to have a ground disturbance impact of 125 feet x 5,200 feet to accommodate the grading and surfacing of the 75-foot runway for its entire proposed

length. The runway would actually be elevated 2-to-3 feet above existing ground surface. There is no excavation proposed as the water table is relatively high in this area. Two 100 foot x 100 foot hangars would be constructed to service the airway. The site access road (existing dirt road) would be improved to service the runway and hangars. No other ground disturbance is planned for the project (See attached Cultural Resources Investigation Limits Map). Vegetation clearing for line of sight would be perpendicular from the edge and along the entire length of the runway fill to approximately 250 feet at a maintained height of approximately 2 feet or less. An additional 500 feet of vegetation would be cleared to the same height off of each end of the runway. Additionally, vegetation beyond the 250-foot limit would be maintained at a height of approximately 5-to-10 feet.

The APE for this project as defined in the attached scope includes the 125 feet x 5,200 feet of ground disturbance for the airstrip, the two 100 foot x 100 foot hangar sites, and the improvements to the existing site access road. The vegetation clearings for line of sight have not been included in the proposed scope, as no ground disturbance will occur within those areas (See attached Cultural Resources Investigation Limits Map).

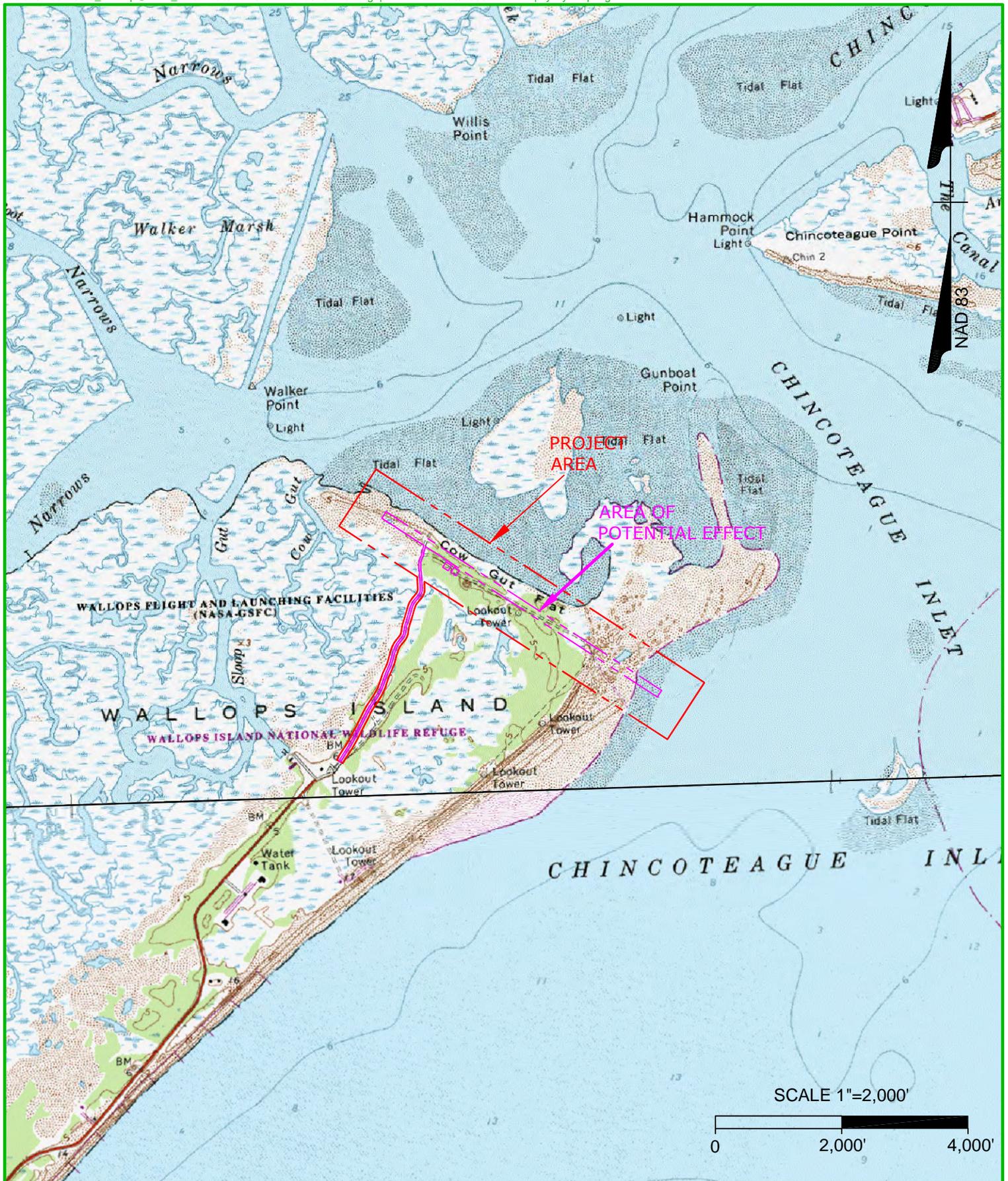
A detailed description technical proposal outlining the proposed survey methodology and staff qualification from New South Associates is attached for you review. If you have any additional questions or require more information about the project, please Mr. Josh Bundick at 757-824-2319 ([joshua.a.bundick@nasa.gov](mailto:joshua.a.bundick@nasa.gov)) or me at 757-824-1309 ([randall.m.stanley@nasa.gov](mailto:randall.m.stanley@nasa.gov)). If you have any specific questions regarding the technical proposal, please contact New South Associates via Mr. Chris Espenshade at (336) 379-0433 ([cespenshade@newsouthassoc.com](mailto:cespenshade@newsouthassoc.com)). Thank you for your attention to this request and we look forward to receiving your comments.



Randall M. Stanley  
Facility Historic Preservation Officer

4 Enclosures

cc: (w/o encl.)  
200/Ms. C. Massey  
228/Mr. P. Bull  
228/Mr. G. Lilly  
250/Mr. J. Bundick



**UAS AIRFIELD AT WFF**  
 ACCOMACK COUNTY, VIRGINIA  
 SITE VICINITY MAP

**TIMMONS GROUP**   
 YOUR VISION ACHIEVED THROUGH OURS.

TIMMONS GROUP JOB NUMBER: 27597  
 PROJECT STUDY LIMITS: 161.1 ACRES  
 LATITUDE: 35°53'05"  
 LONGITUDE: 75°26'16"

U.S.G.S. QUADRANGLE(S): CHINCOTEAGUE WEST AND WALLOPS ISLAND  
 DATE: 1989  
 WATERSHED: CHINCOTEAGUE & EASTERN LOWER DELMARVA  
 HUC IDENTIFICATION: 02060010, 02080110

## **NEW SOUTH TECHNICAL PROPOSAL**

**Principal Investigator: Chris Espenshade, MA, RPA**

**WFF Page 1 of 2**

### **Cultural Resources Assessment**

The Historian will conduct background research at the Wallops Flight Facility, the Library of Virginia, and the Virginia Department of Historic Resources. The research will begin with a review of the 2003 Cultural Resource Assessment. It is anticipated that a focus of the background research will be better defining the history of the military earthwork in the Area of Potential Effect (APE). For this survey, the APE is defined as an area that captures the proposed airstrip plus a construction corridor (125 x 5,200), (2) 100 x 100 hangars, and access road improvements. The APE will be established in the field through the use of Trimble GeoXT GPS receivers with sub-meter positional accuracy.

The main method for site discovery will be excavation of subsurface shovel tests. Given the high sensitivity of the APE for archaeological sites, it is appropriate that this survey use shovel tests excavated at 15-meter intervals. The 15-meter interval is recommended for areas of high archaeological potential by the VDHR in their survey guidelines. At 15-meter intervals, there will be 16 shovel tests per acre for site discovery. These will be positioned through pacing and compass bearing from known points, and the locations of all positive shovel tests will be plotted with the GPS. The shovel tests will measure 30 centimeters in diameter and will be excavated to sterile subsoil, groundwater, or 70 centimeters below surface. The majority of the APE is mapped as Fisherman-Assateague complex, which is characterized by deep sands. It is likely that the majority of the units will need to be excavated to 70 centimeters below surface. Soil will be screened through 0.25-inch mesh. Notes will be made on the soil strata and artifact content of each test.

When artifacts are recovered from a unit, the site will be delineated using a cruciform of shovel tests at 7.5-meter intervals. The site boundaries will be pursued until there are two negative tests in each direction, the landform drops away, or the edge of the APE is reached. A plan map will be prepared for each site, and photographs will be made of each site. All site boundaries, surface finds, positive shovel tests, and any other pertinent natural or cultural features will be recorded with the sub-meter GPS receiver. It is anticipated that 318 shovel tests will be excavated for runway (3 transects of 106 tests each), an estimated 100 additional tests will be required for the road along 1 transect, and an additional 64 tests for site discovery.

Artifacts will be accessioned by discrete field provenience. They will be washed and rebagged with appropriate identifying tags. The focus of the analysis will be to characterize the temporal and functional dimensions of each site, and to provide a comprehensive artifact catalog. Prehistoric pottery will be sorted by aplastic content and surface decoration; type names will be assigned as feasible. Lithic artifacts will be described by raw material and technotype. Shell or bone tools will be described by species and function. Historic artifacts will be first classified by material class (e.g., ceramics). Additional technological and stylistic details will be recorded to narrow the production span (e.g., amethyst glass was produced only 1890-1905). Form will also be recorded when feasible (e.g., pint flask).

Military items will be sorted to army of origin, as feasible. Diameter will be recorded for all munitions; musket balls will be classed as dropped or fired. Buttons and other uniform items will be identified through consultation with published artifact guides.

## **NEW SOUTH TECHNICAL PROPOSAL**

**Principal Investigator: Chris Espenshade, MA, RPA**

**WFF Page 2 of 2**

The consultant will complete a full technical report, as per the guidelines of the VDHR. The report will include: a detailed description of the project and APE; a natural context chapter; a cultural context chapter including a historic overview of the APE; a chapter describing the methods for the background research, field survey, analysis, and curation; a detailed results chapter with throughout descriptions of each site, their soils, and the recovered artifacts; a recommendations chapter that details the eligibility recommendations and appropriate further work; a bibliography; and a complete artifact catalog. The report will have a detailed map of every positive and negative shovel test, a map of every metal detector find, a photograph and plan map for every site discovered, drawings of representative soil profiles, and illustrations of key artifacts.



# COMMONWEALTH of VIRGINIA

L. Preston Bryant, Jr.  
Secretary of Natural Resources

**Department of Historic Resources**  
2801 Kensington Avenue, Richmond, Virginia 23221-0311

Kathleen S. Kilpatrick  
Director

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[www.dhr.virginia.gov](http://www.dhr.virginia.gov)

May 28, 2009

Mr. Randall Stanley  
Facility Historic Preservation Officer  
Goddard Space Flight Center  
Wallops Flight Facility  
Wallops Island, VA 23337

Re: Study Plan Review of the Proposed UAS Airstrip  
Wallops Island  
DHR File #: 2009-0696  
Date Received: April 29, 2009

Dear Mr. Stanley:

We have received information for our review and comment regarding the above referenced project. The proposed survey methodology and Area of Potential Effect appears appropriate for the archaeological investigation proposed. However, because of the possible increase in noise, we recommend that you request the comments of the National Park Service (NPS) Assateague Island National Seashore regarding indirect effects to the NRHP-listed Assateague Beach Lifeboat Station. According to the NPS directory, Trish Kicklighter is Superintendent and Carl Zimmerman is the Resource Management Specialist. These comments will allow us to better comment on the effects of the proposed undertaking.

We look forward to further consultation on this project. If you have any questions about our comments, please contact me at: [ron.grayson@dhr.virginia.gov](mailto:ron.grayson@dhr.virginia.gov) or (804) 367-2323, Ext. 105.

Sincerely,

Ronald Grayson, RPA, Archaeologist  
Office of Review and Compliance

National Aeronautics and  
Space Administration



**Goddard Space Flight Center  
Wallops Flight Facility  
Wallops Island, VA 23337**

Reply to Attn of: 250.W

July 20, 2010

Ms. Trish Kicklighter  
Superintendent  
National Park Service, Assateague Island National Seashore  
7206 National Seashore Lane  
Berlin, MD 21811

Dear Ms. Kicklighter:

In accordance with the National Environmental Policy Act of 1969 (NEPA), as amended, the National Aeronautics and Space Administration (NASA) Goddard Space Flight Center's Wallops Flight Facility (WFF) is preparing an Environmental Assessment to analyze potential impacts associated with the construction and operation of an Unmanned Aerial Systems (UAS) airstrip at the north end of Wallops Island in Accomack County, Virginia (Enclosure 1).

A letter we recently sent to you dated July 14, 2010, describes the full scope of this project. In summary, the proposed UAS airstrip would be constructed of asphalt and measure approximately 914 meters (3,000 feet long [2,500 feet plus an additional 500 feet clear zone]) by 18 meters (60 feet) wide. The airstrip would be elevated approximately 1 meter (3 feet) above the existing ground surface. Two asphalt pads also would be constructed adjacent to the airstrip for staging aircraft and support vehicles during flight operations. A clear line of sight for UAS operators is necessary; therefore, vegetation alongside the length (up to 30 meters [100 feet]) on each side of the proposed airstrip would be cleared and maintained. Additionally, vegetation height would be maintained beyond the ends of the airstrip. Crushed gravel would be used to improve the existing dirt access road to provide service to the airstrip. Infrastructure improvements to provide electrical and telecommunication service would be implemented; however, it is anticipated that most UAS operators would use small portable generators. The total affected area would be approximately 2 hectares (5 acres). The proposed airstrip would likely be constructed in several phases to reach the dimensions described above.

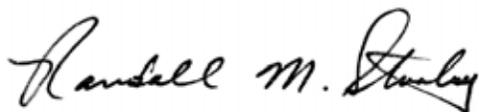
In mid-2009, WFF was preparing for a cultural resources investigation of the project area for the proposed UAS airstrip and consulted with the Virginia Department of Historic Resources (VDHR), which is the Virginia State Historic Preservation Office, regarding the area of potential effects and survey methodology for the investigation. In turn, VDHR recommended consulting with you regarding potential indirect effects of the project on the National Register-eligible Assateague Beach Life-Saving Station located on Toms Cove Hook (Enclosure 1). We are seeking your input concerning WFF's UAS airstrip proposal.

We have determined that UAS operations from the proposed airstrip on Wallops Island would have no adverse effect on the Assateague Beach Life-Saving Station. UAS operations would be conducted year round during NASA's normal Air Traffic Control tower hours (7 AM to 5 PM). Night operations would only take place under special circumstances (e.g., hurricane monitoring). The UAS aircraft would operate within the existing NASA controlled Restricted Airspace Areas (R-6604A/B) and within the Virginia Capes Operating Area (VACAPES OPREA), the Navy's offshore training area (Enclosure 1). Aside from takeoff and landing, the minimum operating altitude would be 152 meters (500 feet). The largest UAS that would be authorized to operate from the proposed airstrip is the Viking 400. The Viking 400 has a 6 meter (20 foot) wingspan, is 4.5 meters (14.7 feet) in length, and would have a maximum weight of 240 kilograms (530 pounds).

UAS would not operate over Assateague Island National Seashore. UAS would take off from the airstrip and fly southeast over water. Preliminary noise analysis indicates the loudest noise would be at the airstrip on Wallops Island; otherwise, the noise environment would not perceptibly change. Because UAS would not fly over Assateague Island National Seashore and the current noise environment beyond Wallops Island would not change, the proposed project would have no indirect visual or audible effects on the Assateague Beach Life-Saving Station.

If you have any questions or require additional information about the project, please contact Mr. Joel Mitchell at (757) 824-1127 or me at (757) 824-1309. Thank you for your attention to this request and we look forward to receiving your comments.

Sincerely,

A handwritten signature in black ink that reads "Randall M. Stanley". The signature is written in a cursive style with a large, prominent initial 'R'.

Randall M. Stanley  
Facility Historic Preservation Officer

Enclosure



**United States Department of the Interior**  
**NATIONAL PARK SERVICE**  
**Assateague Island National Seashore**  
7206 National Seashore Lane  
Berlin, MD 21811  
(410) 641-1443



August 9, 2010

Mr. Joel Mitchell, Natural Resources Manager  
250.W  
NASA Goddard Space Flight Center  
Wallops Flight Facility  
Wallops Island, Virginia 23337

Dear Mr. Mitchell:

Assateague Island National Seashore (AINS), a unit of the National Park Service located in Virginia and Maryland, appreciates the opportunity to provide comments during the preparation of the Environmental Assessment to analyze potential impacts associated with a new UAS airstrip at the north end of Wallops Island, Virginia.

The southern portion of AINS is located approximately 2 miles east of the proposed project. After speaking with you about this project, our understanding is that the project would not add any additional restrictions to the airspace over Assateague Island, that the flight lines would not cross over Assateague Island, and that the noise levels associated with flights would not exceed the ambient noise levels on Assateague Island. With that understanding, we do not have significant concerns at this time about the project's potential impacts on AINS resources or visitor experience.

Thank you for the opportunity to comment. We would appreciate continued communication about this project and any changes to the proposal.

Sincerely,

Trish Kicklighter  
Superintendent, Assateague Island National Seashore

National Aeronautics and  
Space Administration  
**Goddard Space Flight Center**  
**Wallops Flight Facility**  
**Wallops Island, VA 23337**



Reply to Attn of: 228

October 9, 2009

Virginia Department of Historic Resources  
Attn: Mr. Ron Grayson  
Archaeologist, Office of Review and Compliance  
2801 Kensington Avenue  
Richmond Virginia, 23221

Subject: UAS Airstrip at Wallops Flight Facility, Draft Cultural Resources  
Investigation for the Proposed Uninhabited Aerial Systems Airstrip,  
Wallops Flight Facility, Accomack County, Virginia

In accordance with Section 106 of the National Historic Preservation Act, as amended, the National Aeronautics and Space Administration (NASA) Goddard Space Flight Center's (GSFC) Wallops Flight Facility (WFF) is submitting the enclosed draft "*Cultural Resources Investigation of the Proposed Uninhabited Aerial Systems Airstrip*" (Enclosure 1) for your review and concurrence concerning the below-described undertaking.

Wallops Flight Facility (WFF) has contracted Timmons Group to assist with a proposal to create a 1,500 x 34 meter airstrip and associated improvements on the north end of Wallops Island in Accomack County, Virginia. The Uninhabited Aerial Systems (UAS) Airstrip is being proposed to serve as a takeoff and landing facility for UAS. WFF previously consulted with Virginia Department of Historic Resources (VDHR) while preparing the study plan for the proposed undertaking (DHR File #:2009-0696).

#### **Brief Background:**

Previously, an archaeological study was conducted for WFF that included the current project area. The study, *Cultural Resources Assessment, (CRA) NASA Wallops Flight Facility (NASA, 2003c), Accomack County, Virginia*, identified areas of increased sensitivity for the presence of archaeological resources that would require further investigations if the areas were to be disturbed. The CRA briefly discussed the recordation and discovery of Site, 44AC0089, described as a probable Revolutionary War fort. Because no development was planned for the north end of Wallops Island, Site 44AC0089 was not further investigated at that time.

In 2009, Timmons Group sub-contractor New South Associates completed a cultural resource study in support of the proposed construction of UAS Airstrip on north Wallops Island. . The proposed airstrip effectively would reach from the Atlantic Ocean beach across the northern end of the island, to the tidal marshes between the island and the mainland. The project vicinity has mixed vegetation including small hardwoods, 20 to 30-year old planted pines, and dense underbrush. Soils are generally deep sands. The proposed project would entail the construction of a paved airstrip and two hangar buildings, as well as improvements to the current access road.

The archaeological Area of Potential Effects (APE) was originally defined as 1,100 x 10 meters of road improvements, two 30 x 30-meter hangar locations, and 1,500 x 34 meters of airstrip and apron. When it was discovered that the original airstrip location threatened a site recommended eligible for the National Register of Historic Places (NRHP), the APE was revised by shifting the northwestern end of the airstrip to the south as detailed in the enclosed report. The revised APE now completely avoids this area.

The cultural resources investigations also included:

- archaeological survey of the APE as originally defined;
- delineation and evaluation of site 44AC0089, a Revolutionary War fort;
- archaeological survey of the APE after revision to avoid 44AC0089;
- architectural resource survey of the original and revised APEs; and
- architectural evaluation of the North Observation Mound, a mid-late twentieth-century structure.

The background research revealed that 44AC0089 was the only previously recorded site in the original APE. The examination of the APE through screened shovel tests at 15-meter intervals encountered only 44AC0089. The APE was revised to avoid this site, and the survey of the revised APE found no additional archaeological sites. Metal detector survey behind the fort failed to discover any evidence of an associated camp. Site 44AC0089 is a well-preserved example of a small, coastal, gun emplacement from the Revolutionary War. It is recommended eligible for the NRHP under Criteria C and D. The revised APE does not include the site, and the proposed undertaking will have no effect on any sites eligible for, or listed on, the NRHP.

NASA has determined that this undertaking will have no adverse effect on historic properties. NASA is requesting VDHR's concurrence with this determination, and submits the enclosed draft of the *Cultural Resources Investigation of the Proposed Uninhabited Aerial Systems Airstrip* (Enclosure 1) and associated Project Review Form (Enclosure 2) which describes this undertaking for your consideration.

If you have any questions or require any additional information please contact me at (757) 824-1309, or Ms. Shari Silbert at (757) 824-2327.

A handwritten signature in black ink that reads "Randall M. Stanley". The signature is written in a cursive style with a large, stylized initial 'R'.

Randall M. Stanley  
Facility Historic Preservation Officer

2 Enclosures

cc:  
200/Ms. C. Massey  
228/Mr. G. Lilly  
250/Ms. C. Turner



# COMMONWEALTH of VIRGINIA

## Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221-0311

L. Preston Bryant, Jr.  
Secretary of Natural Resources

Kathleen S. Kilpatrick  
Director

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November 12, 2009

Mr. Randall Stanley  
Facility Historic Preservation Officer  
Goddard Space Flight Center  
Wallops Flight Facility  
Wallops Island, VA 23337

Re: UAS Airstrip Draft Cultural Resources Investigation  
Wallops Flight Facility  
DHR File #: 2009-0696  
Date Received: October 13, 2009

Dear Mr. Stanley:

We have received information regarding our review of the above referenced undertaking, including a copy of the Draft report *Cultural Resources Investigations of the Proposed Uninhabited Aerial Systems Airstrip, Wallops Flight Facility, Accomack County, Virginia* (Espenshade and Lockerman: 2009). Based upon information presented in the report, the level of effort appears to be sufficient to have identified any historic properties within the area investigated. However, we are unable to comment on the effect of this undertaking to historic properties without additional information.

We are unable to provide comments regarding the eligibility of the ca. 1952 North Observation Mound (DHR ID# 001-0027-0125) at this time. The hard copy survey file that accompanies the Data Sharing System (DSS) record is incomplete, and the record does not meet the Department's Quality Assurance and Quality Control (QA/QC) requirements. We require the supporting materials (USGS topographic map of the resource, black and white photographs, and sketch plan) be provided to complete this record.

Additional information is also needed to positively determine the eligibility of archaeological site 44AC0089 for listing in the National Register or Historic Places (NRHP). The boundary of the site must be indicated on the contour map (Figure 15). Additionally, further information concerning the soils of the earthwork is needed, including a comparison of soil profiles from within the site to those of the surrounding area. Given the lack of cultural materials, this information is crucial to understanding the construction/formation of this landform.

Administrative Services  
10 Courthouse Avenue  
Petersburg, VA 23803  
Tel: (804) 862-6416  
Fax: (804) 862-6196

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2801 Kensington Ave.  
Richmond, VA 23221  
Tel: (804) 367-2323  
Fax: (804) 367-2391

Tidewater Region Office  
14415 Old Courthouse Way, 2<sup>nd</sup> Floor  
Newport News, VA 23608  
Tel: (757) 886-2807  
Fax: (757) 886-2808

Roanoke Region Office  
1030 Penmar Ave., SE  
Roanoke, VA 24013  
Tel: (540) 857-7585  
Fax: (540) 857-7588

Northern Region Office  
5357 Main Street  
PO Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
Fax: (540) 868-7023

It is stated within the report and in the accompanying cover letter that the plans of the project have been revised to avoid impacts to 44AC0089. However, the plans in the report do not clearly indicate this alteration. Additional plans are needed to assess the impacts of the proposed construction on 44AC0089.

We also request an update regarding the agreements concerning the Wallops Beach Lifeboat Station (DHR ID# 011-0027-0100) and Observation Tower (DHR ID# 011-0027-0101).

We look forward to further consultation on this project. If you have any questions about our comments, please contact me at: [ron.grayson@dhr.virginia.gov](mailto:ron.grayson@dhr.virginia.gov) or (804) 367-2323, Ext. 105.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ron Grayson', is written over a faint, illegible typed name.

Ronald Grayson, RPA, Archaeologist  
Office of Review and Compliance



# COMMONWEALTH of VIRGINIA

## Department of Historic Resources

2801 Kensington Avenue, Richmond, Virginia 23221

Douglas W. Domenech  
*Secretary of Natural Resources*

Kathleen S. Kilpatrick  
*Director*

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August 11, 2010

Mr. Joel T. Mitchell  
Natural Resources Manager  
Goddard Space Flight Center  
Wallops Flight Facility  
Wallops Island, VA 23337

Re: UAS Airstrip Impacts  
Wallops Flight Facility  
DHR File #: 2009-0696  
Date Received: July 15, 2010

Dear Mr. Mitchell:

We have received information regarding our review of the above referenced undertaking, our office previously responded to your agency in a letter dated November 12, 2009. Our current comments are largely the same as those forwarded to you in 2009. However, we are unable to comment on the effect of this undertaking to historic properties without additional information.

We are unable to provide comments regarding the eligibility of the ca. 1952 North Observation Mound (DHR ID# 001-0027-0125) at this time. The hard copy survey file that accompanies the Data Sharing System (DSS) record is incomplete, and the record does not meet the Department's Quality Assurance and Quality Control (QA/QC) requirements. We require the supporting materials (USGS topographic map of the resource, black and white photographs, and sketch plan) be provided to complete this record.

Additional information is also needed to positively determine the eligibility of archaeological site 44AC0089 for listing in the National Register or Historic Places (NRHP). Further information concerning the soils of the earthwork is needed, including a comparison of soil profiles from within the site to those of the surrounding area. Given the lack of cultural materials, this information is crucial to understanding the construction/formation of this landform.

Administrative Services  
10 Courthouse Ave.  
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Roanoke Region Office  
1030 Penmar Avenue, SE  
Roanoke, VA 24013  
Tel: (540) 857-7585  
Fax: (540) 857-7588

Northern Region  
Preservation Office  
P.O. Box 519  
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Tel: (540) 868-7029  
Fax: (540) 868-7033

Even though it appears that direct impacts from the airstrip avoid the archaeological site 44AC0089, the impacts from other activities are unknown. We require a more complete description of the ground disturbing activities in the vicinity of archaeological site 44AC0089. The description should include impacts related to the construction of the airstrip itself and any vegetation clearing activities.

We look forward to further consultation on this project. If you have any questions about our comments, please contact me at: [ron.grayson@dhr.virginia.gov](mailto:ron.grayson@dhr.virginia.gov) or (804) 367-2323, Ext. 105.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Ron Grayson', written in a cursive style.

Ronald Grayson, RPA, Archaeologist  
Office of Review and Compliance

c.c. Randall Stanley, NASA Wallops Historic Preservation Officer

**Silbert, Shari A. (WFF-200.C)[EGG, Inc. (WICC)]**

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**From:** Mitchell, Joel T. (WFF-2500)  
**Sent:** Wednesday, September 22, 2010 2:45 PM  
**To:** Bundick, Joshua A. (WFF-2500); Silbert, Shari A. (WFF-200.C)[EG&G, Inc. (WICC)]  
**Cc:** Bull, Paul C. (WFF-2280); Turner, Carolyn (WFF-2500); Stanley, Randall M. (WFF-2280)  
**Subject:** UAS and the revolutionary war earthworks

Randy Stanley and I, along w/ the TEC folks (Charee, Kim, and Matt) talked w/Ron Grayson and Amanda Lee of VDHR today concerning the extent of buffer zone that would be required for construction of the air strip and the associated vegetation clearing activities.

First of all, Ron said that DHR had not yet determined that the site was eligible and referred to the information DHR requested back in 2009 and again this summer in 2010. Specifically it was soil profile information that would determine the boundaries of the earthworks and determine if changing conditions over the years would have redeposited soils or filled areas which would minimize the archaeological value of portions of the site..

Ron continued that typically a Phase II survey would answer these questions. I responded that New South had conducted a "limited Phase II at the site and Ron said that he still needed the information that DHR had requested. He also said that in the interests of time you can just assume that the site is eligible and use the profile information to determine the buffer and the type of clearing activities (if any) would be allowed on and within the earthworks themselves. When pressed about typical buffer distances for very unstable soils, he would not commit. Evidently depending on the site, you may need no buffer and a buffer up to 100+ feet.

The upshot of the meeting was that DHR cannot advise us on buffer zones and clearance activities until it is provided with the soil profile information. Kim indicated that she had the information, would pull it together and send it to NASA for review, whereupon we'll forward it to DHR with all due dispatch.

Ron said that information should be sent to Amanda Lee, who will be our point of contact until a permanent replacement for Ron Grayson is chosen. Ron is leaving DHR as of next Thursday.

Randy, if you have anything to add or change, please reply to the group. Thanks.

Joel Mitchell  
Environmental Engineer  
NASA Wallops Flight Facility  
757-824-1127



# COMMONWEALTH of VIRGINIA

## Department of Historic Resources

Douglas W. Domenech  
*Secretary of Natural Resources*

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Kathleen S. Kilpatrick  
*Director*

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November 22, 2010

Mr. Randall M. Stanley, Historic Preservation Officer  
NASA Goddard Space Flight Center  
Wallops Flight Facility  
Building N-161, Room 127  
Wallops Island, Virginia 23337

Re: UAS Airstrip Cultural Resources Investigations  
Accomack County  
DHR File No. 2009-0696

Dear Mr. Stanley,

On October 26, 2010, the Virginia Department of Historic Resources (DHR) received additional information (letter describing the proposed action as well as the additional information requested by DHR in its letter of November 12, 2009) regarding the above referenced project for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended. Unfortunately, we are unable to comment on the effect of this undertaking to historic properties.

We are unable to provide comments regarding the eligibility of the ca. 1952 North Observation Mound (DHR ID# 001-0027-0125) at this time. The hard copy survey file that accompanies the Data Sharing System (DSS) record is incomplete, and the record does not meet DHR's Quality Assurance/Quality Control (QA/QC) requirements. We require the supporting materials (USGS topographic map of the resource, black and white photographs, and sketch plan) be provided to complete this record. While your submission noted that black and white photographs were provided, none accompanied the report. We do appreciate the submission of the digital photographs, but current survey standards require black and white photographs for the file as well as mapping that is separate for a produced report.

DHR understands that NASA WFF wishes to treat archaeological site 44AC0089, the Revolutionary War earthworks, as eligible for listing in the National Register of Historic Places. DHR agrees to this treatment for the purposes of compliance with Section 106 of the National Historic Preservation Act. The proposed UAS Airstrip has the potential to affect site 44AC0089, perhaps adversely, and NASA proposes five options for protection of the resource

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Roanoke Region Office  
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Tel: (540) 857-7585  
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Northern Region  
Preservation Office  
P.O. Box 519  
Stephens City, VA 22655  
Tel: (540) 868-7029  
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during construction. While the "No Disturbance" option, which calls for retaining all current vegetation and excluding heavy machinery on the site and within a reasonable buffer, may be the most effective way to preserve site 44AC0089, DHR accepts that this is not the only feasible option. Accordingly, DHR would accept the following as appropriate treatment of site 44AC0089:

1. Establish a 25-foot buffer around the site within which no heavy machinery is allowed.
2. Depict the buffer zone on all construction plans.
3. Erect during construction a temporary exclusion fence around the site, including the buffer.
4. Remove, by hand, all vegetation on the site at or above ground level while keeping all roots intact and minimizing foot traffic on the earthworks.
5. Seed the site with a low-lying, non-woody ground cover.
6. Establish a maintenance plan that monitors the condition of the earthworks and stipulates procedures for future vegetation removal, as needed.

We look forward to receiving the DSS record and supporting materials for North Observation Mound (DHR ID# 001-0027-0125) and notice of your preferred option regarding the treatment of archaeological site 44AC0089. Should you have any questions, I may be reached via email at [amanda.lee@dhr.virginia.gov](mailto:amanda.lee@dhr.virginia.gov) or by phone at 804-367-2323 Ext. 122.

Sincerely,



M. Amanda Lee, Historic Preservationist  
Office of Review and Compliance



National Aeronautics and  
Space Administration  
Goddard Space Flight Center  
Wallops Flight Facility  
Wallops Island, VA 23337

December 13, 2010

Amanda Lee  
Commonwealth of Virginia  
Department of Historic Resources  
2801 Kensington Avenue  
Richmond, Virginia 23221-0311

RE: UAS Airstrip Cultural Resources Investigations  
Wallops Flight Facility  
DHR File #2009-0696

Dear Ms. Lee:

As per your request in your letter of November 22, 2010, please find enclosed the additional information for the determination of eligibility for the 1952 North Observation Mound (DHR# 001-0027-0125). Included are a copy of the VDHR resource survey form, topographical maps, and a site sketch on acid-free paper. A set of black and white photographs (from digital) in Print File sleeves are included, as well as a CD with the digital photo files.

In addition, NASA has determined that the following options will be taken to preserve and protect the earthworks associated with the Revolutionary War Fort (44AC0089) during construction of the new UAS airstrip. Option 1 would establish a 25-foot buffer zone around the earthworks within which no clearing will be done and the site will be maintained and preserved in its current state.

Should it be determined that the vegetation must be removed from the site for safety concerns, trees and large vegetation will be hand-cleared from the site and 25-foot buffer zone. NASA will attempt to control excess foot traffic and inadvertent damage to the earthworks during clearing activities. The roots of trees and other vegetation will not be removed from the earthworks to minimize damage and the site will be reseeded with an approved, non-woody ground cover.

A long-term maintenance plan will be established that will outline procedures for yearly vegetation removal and that will monitor the state of the earthworks. The plan may include observations of erosion and/or other damage to the earthworks through photodocumentation and

include provisions for short and long term stabilization techniques and emergency stabilization in the event of natural disasters, including hurricanes. Long-term maintenance may include the erection of a permanent enclosure to guard against vandalism or inadvertent damage to the site.

If you have any questions or require additional information about the project, please contact Mr. Joel Mitchell at (757) 824-1127 or me at (757) 824-1309. Thank you for your attention to this request and we look forward to receiving your comments.

Sincerely,

A handwritten signature in black ink that reads "Randall M. Stanley". The signature is written in a cursive style with a large, looping initial "R".

Randall M. Stanley  
Facility Historic Preservation Officer

Enclosure



# COMMONWEALTH of VIRGINIA

## Department of Historic Resources

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January 10, 2011

Mr. Randall M. Stanley, Historic Preservation Officer  
NASA Goddard Space Flight Center  
Wallops Flight Facility (WFF)  
Building N-161, Room 127  
Wallops Island, Virginia 23337

Re: UAS Airstrip Cultural Resources Investigations  
Accomack County  
DHR File No. 2009-0696

Dear Mr. Stanley,

On December 14, 2010, the Virginia Department of Historic Resources (DHR) received additional information regarding the above referenced project for our review and comment pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended.

Based upon a review of the information provided regarding the ca. 1952 North Observation Mound (DHR ID# 001-0027-0125), DHR concurs that the resource is not eligible for inclusion in the National Register of Historic Places.

DHR understands that NASA WFF has determined that it will implement Option 1 regarding the treatment of the Revolutionary War Fort, archaeological site (44AC0089). NASA WFF will establish a 25-foot buffer zone around the earthworks within which no clearing will be done, and the site will be maintained and preserved in its current state. DHR recommends no adverse effect to 44AC0089 by this option.

Should you have any questions, I may be reached via email at [amanda.lee@dhr.virginia.gov](mailto:amanda.lee@dhr.virginia.gov) or by phone at 804-367-2323 Ext. 122.

Sincerely,

M. Amanda Lee, Historic Preservationist  
Office of Review and Compliance

Cc: Shari A. Silbert, NASA WFF

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