



Appendix F

Agency Consultation
Letters



Section 106 of the National Historic Preservation Act Consultation

Initial letter to the Texas State Historical Preservation Officer



DEPARTMENT OF THE AIR FORCE
12TH FLYING TRAINING WING
JOINT BASE SAN ANTONIO – RANDOLPH TEXAS

21 June 2021

Dayna Cramer
Cultural Resources Manager
802 CES/CEIEA
1555 Gott Street
JBSA-Lackland TX 78236

Mr. Mark Wolfe
State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276, Capitol Station
Austin TX 78701

Dear Mr. Wolfe:

The United States Air Force (Air Force) is proposing to recapitalize its flight training program with newer and more capable T-7A Red Hawk aircraft at Joint Base San Antonio (JBSA), Texas. Recapitalization is the phased acquisition of the new generation T-7A aircraft and construction and upgrade of specific facilities to support the training, operation, and maintenance of the T-7A aircraft. To consider various environmental concerns, the Air Force is engaging early with the appropriate resource and regulatory agencies as it formulates the undertaking. The Air Force is also preparing an Environmental Impact Statement under the National Environmental Policy Act to evaluate potential environmental impacts associated with the T-7A recapitalization at JBSA.

In accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations at 36 CFR Part 800, the Air Force and JBSA are initiating consultation and advising you of a proposed undertaking that has the potential to affect historic properties.

The undertaking would entail the phased introduction of T-7A aircraft and phased reduction of the T-38C aircraft currently operating from JBSA-Randolph; new intensities of flight operations at JBSA-Randolph, JBSA-Lackland, and Seguin Auxiliary Airfield including nighttime operations at JBSA-Randolph and JBSA-Lackland; and the introduction of approximately 300 new personnel at JBSA-Randolph. T-7A operations would occur within the same designated military airspace boundaries currently used for T-38C operations, and no changes to established Special Use Airspace configurations (i.e., size, shape, or location) would occur. Additionally, construction for six military construction (MILCON) projects and 13 facilities sustainment, restoration, and modernization (FSRM) projects would occur at JBSA-Randolph to provide modern facilities and infrastructure to support the T-7A aircraft's maintenance, training, and operational requirements. The MILCON and FSRM projects include new building construction including placement of four 15-foot-tall antennae on top of a new building (arranged along roof ridge), renovation of several existing buildings and hangars, repainting taxi lines, and relocation of displaced athletic facilities. The undertaking's potential to impact historic properties is from the MILCON and FSRM projects at JBSA-Randolph. Details on the MILCON and FSRM projects and their individual assessment of effect can be found in **Attachment 1**. No ground disturbance would occur at JBSA-Lackland and Seguin Auxiliary Airfield.

The Area of Potential Effect (APE) for this undertaking is defined as the potential impact area from all activities. The APE includes areas of potential direct and indirect effects. Direct effects include those from ground disturbance, vibration, building modification, and staging and equipment storage. Indirect effects include those from noise and aesthetic interference. For this undertaking, the direct APE is defined as all buildings proposed for interior and exterior alteration, including a 50-foot buffer around those buildings to account for construction staging; all areas of new construction; all landscape features such as the existing ball field, tennis court, and taxi lanes proposed for alteration; and the location of the proposed ball field. The indirect APE is an area 0.25 miles in radius centered around the GBTS facility where four 15-foot-tall antennae would be located on top of the building. The indirect APE includes the full distance (0.25 miles) that the 15-foot-tall antennae are anticipated to be present within the setting of adjacent facilities, though actual viewing distance is anticipated to be much shorter in some locations depending on the presence of adjacent buildings, structures, utility components, and foliage. The direct and indirect APE total approximately 56 acres and are shown on **Attachment 2**. The APE does not include any portions of JBSA-Lackland and Seguin Auxiliary Airfield because no ground disturbance would occur at these installations. Additionally, the APE does not include areas within the airspace where the T-7A would perform operations because T-7A flight training would occur at a relatively high altitude in previously defined military airspace and would have no potential to impact historic properties.

The Air Force has conducted both architectural and archaeological surveys within the APE. Architectural surveys have resulted in the identification of several historic properties, including the Randolph Field National Historic Landmark District (NHLD), which was listed in the National Register of Historic Places (NRHP) in 1996 and designated a National Historic Landmark in 2001. The district is composed of 350 contributing resources and 47 non-contributing resources. Other historic properties at JBSA-Randolph include two individually eligible properties dating to the Cold War era (Buildings 40 and 41), which were determined eligible for the NRHP in 2002 during a Cold War-Era buildings and structures inventory and assessment. Of the historic properties at JBSA-Randolph, ten are located within the APE including Randolph Field NHLD and nine contributing resources located within the district. The Randolph Field NHLD is shown on **Attachment 2**.

One archaeological study has been conducted at JBSA-Randolph. In 1991, the National Park Service Interagency Archeological Services, Denver, Colorado, surveyed areas of JBSA-Randolph considered to have a high potential for intact sites. No archaeological resources were identified by the study, and no further work was recommended. No archaeological sites have been identified at JBSA-Randolph. The Air Force is concurrently conducting tribal consultation with all interested tribal government parties to ensure the tribes are provided ability to comment on the undertaking and whether it may adversely affect any historic properties of religious and cultural significance to the interested tribes.

Nine of the MILCON and FSRM projects would have no potential to impact cultural resources as they occur outside of the Randolph Field NHLD and include buildings, structures, or sites that have been previously determined not eligible for NRHP listing or were constructed after 1990 and have not reached the threshold for NRHP evaluation. Further, some of these projects would not involve ground disturbance, building modifications or construction, or other activities with potential to affect cultural resources and were not included in the APE.

The remaining ten MILCON and FSRM projects have the potential to impact cultural resources because they are located within the Randolph Field NHLD and the district is a historic property. Of those ten projects, five would occur within interior of buildings located in the Randolph Field NHLD (with no impact to character-defining interior features) and would have no effect on contributing resources within the district or the NHLD itself. The remaining five projects would include exterior alteration to two NHLD-contributing hangars, repainting of the taxi lanes, and the construction of the GBTS and MTS facilities.

An adverse effect is one that changes elements or characteristics of a historic property that make the property eligible for listing in the NRHP. The exterior alterations to Hangars 6 and 72 would occur on secondary elevations and would not adversely impact character-defining features. The bay window proposed for the southeast corner of Hangar 6 would be located within a rear addition last remodeled in 1985 and would not remove any historic wall material. The balcony proposed for Hangar 6 would be located on top of the lean-to addition and would only be visible from the rear of the hangar. The door to access the balcony would also be located on the rear of the hangar within a non-character defining section of wall currently punctuated by steel vents. Hangar 72 would include the alteration of two exterior doors; however, alteration would occur within existing door framing. Exterior fencing would also be removed; however, it is not a character defining feature of the hangar. Thus, there would be no adverse effect to those two listed and contributing hangars. The taxi lanes, though partially located within the APE, do not contribute to the Randolph Field NHLD and their repainting would have no adverse effect on the NHLD.

The last two components include the MTS and GBTS facilities. Both facilities would require the removal of non-contributing and non-historic recreational facilities within the NHLD. Thus, neither component would directly impact any contributing resources within the NHLD. Though there would be no physical impact to any contributing buildings, structures, or contributing open areas, the MTS and GBTS facilities would be present within the setting of the NHLD and would be visible from NHLD-contributing facilities. Features located within the setting of the NHLD have been identified as contributing resources, specifically the airfield plan, which includes the (overall) original plan for the flying field, the road layout of almost 32 miles, the park-like areas and boulevards, and the placement of pivotal buildings.

Though the MTS and GBTS facilities would be visible within the setting of the NHLD, neither facility would require alteration to the overall facility plan; the non-historic recreation features to be removed were not part of original plan; the roadway layout would not change; the tree-lined boulevards or historic landscaped open spaces would not change; and the placement of pivotal buildings would remain. Thus, though the MTS and GBTS facilities would be visible within the setting of the NHLD, the overall effect to the setting is recommended as non-adverse as there would be no change to elements or characteristics of the historic property (i.e., the Randolph Field NHLD) that make it eligible for listing in the NRHP (i.e. contributing buildings or structures, the roadway network, contributing open spaces, or the tree-line streets).

Lastly, the proposed GBTS facility would include four 15-foot-tall antennae located on top of the building. The GBTS facility would be located with the Randolph Field NHLD and would be potentially visible from up to 0.25 miles (i.e., throughout the indirect APE). There are currently lamp posts and other antennae and vertical incursions within the immediate landscape of the proposed antennae location. The antennae would be placed on top of the newly constructed GBTS facility, arranged along the ridge, and would be uniform in height and evenly spaced, see image shown on **Attachment 3**. The antennae would be minimally visible within a small portion of the Randolph Field NHLD and would not diminish the District's integrity of setting.

The MILCON and FSRM projects would be largely located on previously disturbed land and unidentified archaeological or traditional resources are not expected. Should unidentified historic properties or human remains be encountered during construction, the Air Force would follow the procedures for inadvertent discoveries provided in the JBSA Integrated Cultural Resources Management Plan.

The Air Force has reviewed the Criteria of Adverse Effect and have determined that none apply to the activities that would be carried out in this undertaking. The undertaking avoids destruction of or adverse alterations to historic properties and any exterior alterations that would occur would meet the

Secretary of the Interior's Standards. Adverse effects were also avoided through the thoughtful placement of new construction in non-contributing areas of the Randolph Field NHL, areas of compromised integrity, or outside of the District boundary; limiting exterior building alterations; and limiting the overall footprint of the undertaking.

Pursuant to 36 CFR § 800.5(b), the Air Force has determined that there would be no adverse effect to historic properties by T-7A recapitalization at JBSA. Attached for your review are copies of relevant supporting documents supporting the Air Force's findings and determinations.

We request your comment and/or concurrence on the finding of *No Adverse Effect*. If we do not receive your comments and/or concurrence within the required 30 days, we will assume concurrence and proceed with the undertaking as described.

Please contact me by phone at (210) 740-8340; by electronic correspondence at 502ces.ceiea.culturalresources@us.af.mil; or by written correspondence at 802 CES/CEIEA, 1555 Gott Street, JBSA-Lackland TX 78236 if you have any questions.

Sincerely,

Dayna
Cramer

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Dayna Cramer
Date: 2021.06.21
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DAYNA CRAMER, USAF
Cultural Resources Manager
802 Civil Engineer Squadron

Attachments:

1. Project Component Details and Assessment of Effect
2. Area of Potential Effect – June 2021
3. Rendition of the Proposed GBTS Facility and Antennae – June 2021

Attachment 1: Project Component Details and Assessment of Effect

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
MILCON Projects				
Facility 388 (Non-Historic Tennis Court); Facility 389 (Non-Historic outbuilding); 390 (Historic Tennis Court, Demolished)	<p>Construct a 30,000-ft² high-bay aircraft MTS facility at the current location of Facilities 388, 389, 390, and 397. New construction would occur within the Randolph Field NHLD and on existing ball field and tennis court properties.</p> <p>All existing facilities are non-historic and ineligible, except for Facility 390, which was replaced with a skate park ca. 2004 and is no longer extant. All new construction would occur within an existing recreation area. A new ball field and tennis courts would be constructed on vacant land as a replacement and would not be located within the Randolph Field NHLD.</p>	<p>Facility 388 – Not historic (non-contributing to the Randolph Field NHLD)</p> <p>Facility 389 – Not historic (non-contributing to the Randolph Field NHLD)</p> <p>Facility 390 – Listed, contributing to Randolph Field NHLD; however, demolished ca. 2004 and now a skateboarding park.¹</p>	<p>ca. 1980</p> <p>ca. 1980</p> <p>ca. 1950 (demolished ca. 2004)</p>	<p>No adverse effect</p>
Facility 397 (Non-Historic Ball Field)	<p>Construct a 33,000 ft² facility to hold a GBTS facility. Construct a 10,125 ft² parking lot to support the MTS and GBTS facilities. Four antennae would be located on top of the GBTS facility and would extend up to a maximum height of 15 feet above the building.</p> <p>New construction on existing ball field and tennis court property within the Randolph Field NHLD. Existing facility is non-historic and ineligible. All new construction would occur within existing recreation area. The antennae may be visible for up to approximately 0.25 miles; however, trees and buildings in the immediate vicinity would obscure that view, especially towards the center of the base to the southwest.</p>	<p>Facility 397 – Not eligible (non-contributing to the Randolph Field NHLD)</p>	<p>ca. 1970</p>	<p>No adverse effect</p>

¹ Historic aerial photographs show this facility was demolished ca. 2004.

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Hush House Pad (Non-Historic)	<p>The proposed hush house pad would be constructed on the site of the existing hush house pad and would be a 24,611 ft² concrete pad. The hush house pad is not located within the Randolph Field NHLD. The existing hush house pad has not been previously recorded and is a concrete pad constructed ca. 1990.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect
Fuel Cell Facility	<p>Construct 35,138 ft² fuel cell facility and parking area west of Building 38 on currently vacant land not located within the Randolph Field NHLD. As the facility has not yet been constructed, and would be located on currently vacant land, it does not have a facility number.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	N/A (not yet constructed)	N/A – Vacant	No effect
T-7A Shelters	<p>Construct 65 shelters for T-7A aircraft to replace existing, non-historic shelters. Structures are not located within the Randolph Field NHLD.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Not historic (not located within the Randolph Field NHLD)	ca. 2004	No effect
Building 38	<p>Building 38 would be modified by adding two more rooms (5,000 ft²) to the southwest side. Building 38 is not located within the Randolph Field NHLD.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
FSRM Projects				
Hangar 63	Interior of first floor to be modified. No alteration to exterior of building and no character-defining features impacted. Building is located within the Randolph Field NHLD. Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.	Listed, contributing to the NHLD	1931	No effect
T-1 shelters rows 16 to 20	Relocate five existing rows of T-1 shelters (rows 16 to 20) from the East Ramp to South Ramp. The T-1 shelters are currently not within the Randolph Field NHLD and would remain out of the district upon being moved. No character-defining features of the NHLD have the potential to be impacted. Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.	Not historic (existing shelters) (not located within the Randolph Field NHLD)	ca. 2004	No effect
Hangar 13	Interior of hangar to be modified for training and communication equipment. No character-defining features impacted. Building is located within the Randolph Field NHLD. Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.	Listed, contributing to the NHLD	1931	No effect
Building 220	Public Affairs would move from Hangar 6 to Building 220. Interior modifications to use as office space; installation of utilities including electrical service and computer and phone lines. No character-defining features impacted. Building is located within the Randolph Field NHLD. Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.	Listed, contributing to the NHLD	1930	No effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Hangar 72	Exterior modifications include the removal of a blocked door and install two lockable full-length glass doors. Security Forces fencing and concertina razor wire would be removed. Interior modification includes the demolition of the Flight Service Center office complex and gun vault. Building is located within the Randolph Field NHLD.	Listed, contributing to the NHLD	1931	No adverse effect
Hangar 6	Interior modifications to modernize equipment. Two exterior alterations on rear, secondary elevation. Both alterations would occur within extensively altered rear lean-to addition (NPS 2001). One small bump-out would be added to lean-to addition on southeast corner of building that would include a bay window for the Ops Desk to observe flight take-off on runway side. Alteration to non-historic wall material. In addition, a balcony would be added on top of the lean-to addition on the rear elevation and would require two exit doors to be added within the second floor of the rear to access the balcony. No character-defining features would be impacted. Building is located within the Randolph Field NHLD.	Listed, contributing to the NHLD	1931	No adverse effect
A1 and A6 Hammerhead Taxi Lanes	<p>Repaint A1 and A6 hammerhead taxi-lane markings and restripe for T-7A aircraft. Taxi lanes are not significant setting features and have been modernized and re-stripped on many occasions over time.</p> <p>A portion of the existing taxi lanes proposed for marking and restriping are located within the Randolph Field NHLD; however, no character-defining features of the NHLD have the potential to be impacted.</p>	Not eligible (non-contributing to the Randolph Field NHLD)	ca. 1930	No adverse effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Building 2, Buildings 878, and Building 891	Move CE Plumbers and HVAC personnel and equipment from Building 2 to Buildings 878 and 891.	Building 2 – Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect
	Buildings 2, 878, and 891 are not located within the Randolph Field NHLD.	Building 878 – Not historic (not located within the Randolph Field NHLD)	ca. 1975	
	Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.	Building 891 – Not eligible (not located within the Randolph Field NHLD)	ca. 1960	
Hangar 12	Interior alteration to hanger for 560 FTS expansion to install new operational equipment. No character-defining features impacted. No exterior alteration. Building is located within the Randolph Field NHLD. Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.	Listed, contributing to the NHLD	1931	No effect
Building 2	Alteration to relocate J85 engine shop. Building 2 is not located within the Randolph Field NHLD. Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.	Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect
Hangar 5	Reconfigure interior of hangar for use as a repair facility. Remove interior engine shop mechanical equipment. No character-defining features impacted. No exterior alteration. Building is located within the Randolph Field NHLD. Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.	Listed, contributing to the NHLD	1931	No effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Ammunition Storage Area	<p>A new 1,855 ft² munitions storage building would be added to the JBSA-Randolph ammunition storage area. The proposed facility would not be located within the Randolph Field NHL. New building on vacant land.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	N/A; JBSA-Randolph ammunition storage area is not historic	ca. 2004	No effect
Trim Pad/Compass Rose	<p>Utilize the existing Trim Pad to install an anchor and relocate the Compass Rose. Located on the airfield and not within the Randolph Field NHL.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	N/A; trim pad is part of the parking ramp and compass rose is aeronautical equipment	Unknown	No effect

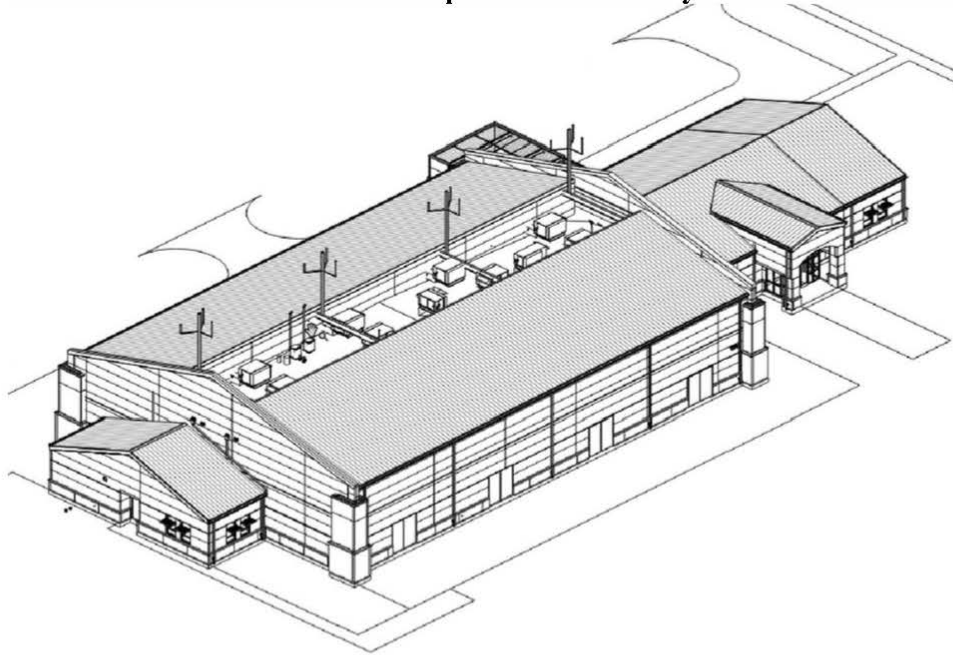
Key: N/A = not applicable, ca. = circa (approximately).

Attachment 2: Area of Potential Effect



Attachment 2

Attachment 3: Rendition of the Proposed GBTS Facility and Antennae



Note: Four 15-foot-tall antennae along roof ridge.

Attachment 3

First response from the Texas State Historical Preservation Officer

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>
Sent: Tuesday, July 20, 2021 4:28 PM
To: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>; reviews@thc.state.tx.us
Subject: [Non-DoD Source] Section 106 Submission

Re: Project Review under Section 106 of the National Historic Preservation Act

THC Tracking #202111701

Date: 07/20/2021

T-7A Recapitalization

JBSA-Randolph

Cibolo, TX 78150

Description: Recapitalization is the acquisition of the new generation T-7A aircraft and construction and upgrade of specific facilities to support the training, operation, and maintenance of the T-7A aircraft.

Dear CRM:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Lydia Woods, Caitlin Brashear, Emily Dylla, has completed its review and has made the following determinations based on the information submitted for review:

Above-Ground Resources

- Property/properties are eligible for listing or already listed in the National Register of Historic Places.
- THC/SHPO unable to complete review at this time based on insufficient documentation. A supplemental review must be submitted, and the 30-day review period will begin upon receipt of adequate documentation.

Archeology Comments

- No identified historic properties, archeological sites, or other cultural resources are present or affected. However, if cultural materials are encountered during project activities, work should cease in the immediate area; work can continue where no cultural materials are present. Please contact the THC's Archeology Division at 512-463-6096 to consult on further actions that may be necessary to protect the cultural remains.

We have the following comments: A full scope of work including photographs, plans and specs and renderings, if available, are needed to properly evaluate the effects determination for the work on Hanger 6 and 72. Please submit the additional information as a supplemental review at your earliest convenience.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: lydia.woods@thc.texas.gov, caitlin.brashear@thc.texas.gov, emily.dylla@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,

for Mark Wolfe, State Historic Preservation Officer
Executive Director, Texas Historical Commission

Please do not respond to this email.

First reply to the Texas State Historical Preservation Officer



DEPARTMENT OF THE AIR FORCE
12TH FLYING TRAINING WING
JOINT BASE SAN ANTONIO – RANDOLPH TEXAS

13 October 2021

Dayna Cramer
Cultural Resources Manager
802 CES/CEIEA
1555 Gott Street
JBSA-Lackland TX 78236

Mr. Mark Wolfe
State Historic Preservation Officer
Texas Historical Commission
P.O. Box 12276, Capitol Station
Austin TX 78701

RE: THC Tracking #202111701

Dear Mr. Wolfe:

The United States Air Force (Air Force) submitted an electronic letter to your office on 21 June 2021 regarding our proposal to recapitalize the flight training program at Joint Base San Antonio (JBSA), Texas, with newer and more capable T-7A Red Hawk aircraft. Your office responded to our letter on 20 July 2021 with comments on the proposed modifications to Hangars 6 and 72. To address your comments, we are providing a supplemental letter addressing your comments from 20 July 2021. Our supplemental information is as follows:

As outlined in detail in the initial letter provided 21 June 2021, the undertaking includes MILCON and FSRM projects at JBSA-Randolph. Supplemental information has been submitted as requested for the MILCON projects associated with Hangars 6 and 72, provided in **Attachment 1**. The Area of Potential Effects (APE) for the undertaking, outlined in detail in the letter provided 21 June 2021, is provided in **Attachment 2**.

Though exterior modification was originally anticipated for Hanger 6, the project has been revised as the design has advanced, and no exterior alteration would occur to Hanger 6 as result of the project. See project plans provided in **Attachment 3**. Interior modifications would occur to modernize equipment and reconfigure interior office and training spaces. The project would also include adding telecommunication lines that would not impact the building exterior and no alteration to the exterior of the building would occur. In addition, no character-defining features of the building would be impacted. Interior modifications to non-public portions of the historic building are covered under the *Programmatic Agreement Among the U.S. Air Force and the Texas State Historical Preservation Officer for the Operation, Maintenance and Development of Joint Base San Antonio, Texas* ("PA," signed January 2021).

Exterior alterations to Hangars 72 would occur on secondary elevations and are anticipated to not adversely impact any character-defining features. Hangar 72 modifications would include the alteration of two exterior doors; however, alteration would occur within existing door frames. Exterior fencing would also be removed; however, the fencing is not a character defining feature of the hangar. The

renovation plans for Hanger 72 are being developed and are not expected to be complete until 2023 or 2024. Therefore, this aspect of the project will be further consulted on when the design has advanced to an acceptable level to demonstrate the extent of alterations. Work occurring to Hanger 72 is expected to be covered under the 2021 PA.

The Air Force has reviewed the Criteria of Adverse Effect and have determined that none apply to the activities that would be carried out in this undertaking, pending further consultation regarding alterations to Hanger 72. The undertaking avoids destruction of or adverse alterations to historic properties and any exterior alterations that would occur would meet the Secretary of the Interior's Standards. Adverse effects were also avoided through the thoughtful placement of new construction in non-contributing areas of the Randolph Field NHL, areas of compromised integrity, or outside of the District boundary; limiting exterior building alterations; and limiting the overall footprint of the undertaking.

Pursuant to 36 CFR § 800.5(b), the Air Force has determined that there would be no adverse effect to historic properties by T-7A recapitalization at JBASA, pending further consultation regarding alterations to Hanger 72. Attached for your review are copies of relevant supporting documents supporting the Air Force's findings and determinations.

We request your comment and/or concurrence on the finding of *No Adverse Effect*, pending further consultation regarding Hanger 72. If we do not receive your comments and/or concurrence within the required 30 days, we will assume concurrence and proceed with the undertaking as described.

Please contact me by phone at (210) 740-8340; by electronic correspondence at 502ces.ceica.culturalresources@us.af.mil; or by written correspondence at 802 CES/CEIEA, 1555 Gott Street, JBASA-Lackland TX 78236 if you have any questions.

Sincerely,

Dayna
Cramer

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Dayna Cramer
Date: 2021.10.13
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DAYNA CRAMER, USAF
Cultural Resources Manager
802 Civil Engineer Squadron

CC: Justin Henderson
National Park Service
Intermountain Region
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225

Attachments:

1. Supplemental Project Component Details and Assessment of Effect
2. Area of Potential Effect – June 2021
3. Project Plans for Hanger 6

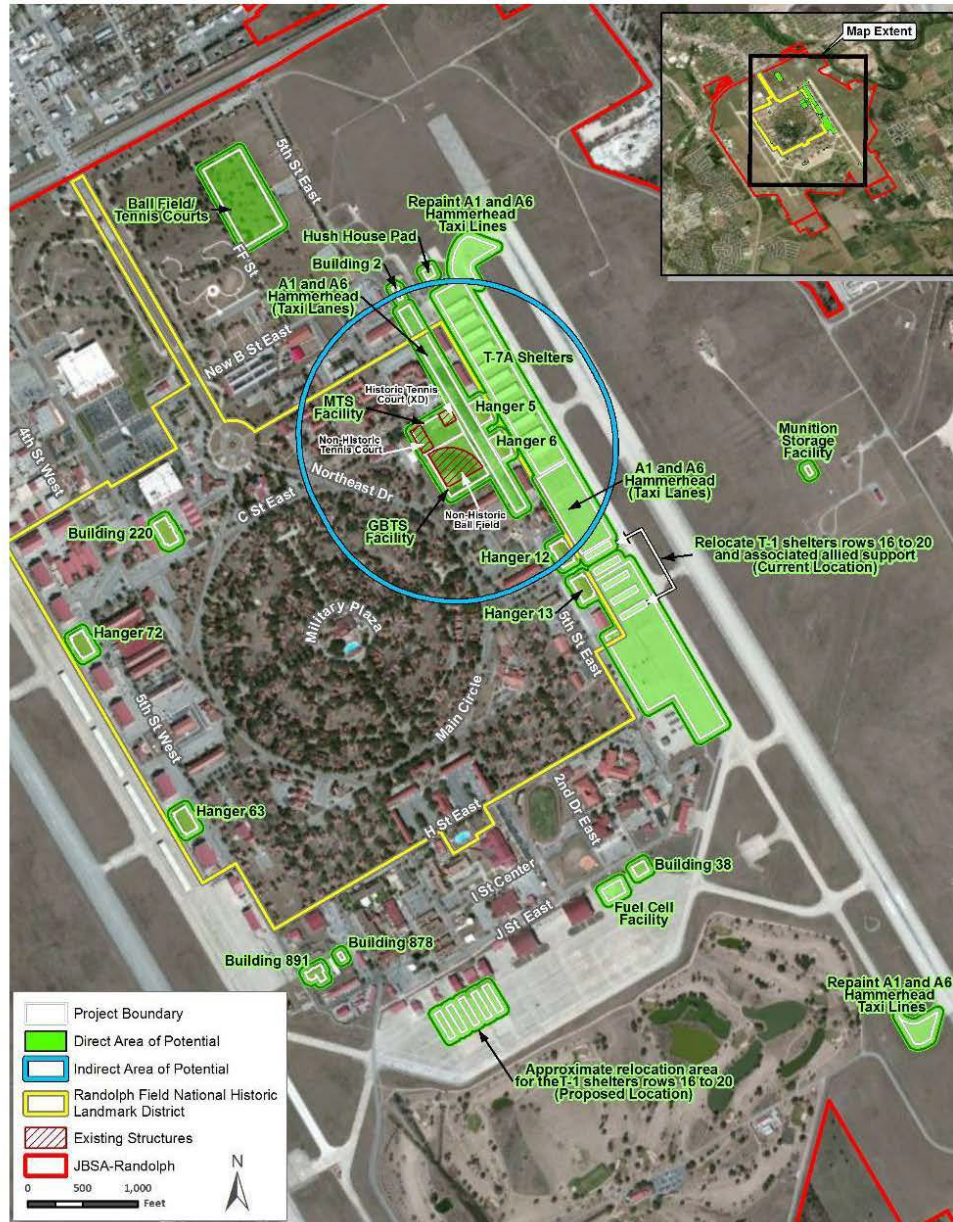
Attachment 1: Supplemental Project Component Details and Assessment of Effect

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
MILCON Projects				
Hangar 6	<p>Though exterior modification was originally anticipated for this building, the project has been revised as the design has advanced, and no exterior alteration would occur to Hangar 6 (see Attachment 3). Interior modifications would occur to modernize equipment and reconfigure interior office and training spaces. The project would also include adding telecommunication lines that would not impact the building exterior. No alteration to the exterior of the building would occur. No character-defining features would be impacted. This building is located within the Randolph Field NHLD.</p> <p>Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Listed, contributing to the NHLD	1931	No adverse effect
Hangar 72	Exterior modifications include the removal of a blocked door and install two lockable full-length glass doors. Security Forces fencing and concertina razor wire would be removed. Interior modification includes the demolition of the Flight Service Center office complex and gun vault. Building is located within the Randolph Field NHLD.	Listed, contributing to the NHLD	1931	No adverse effect

Key: N/A = not applicable, ca. = circa (approximately).

Atch 1

Attachment 2: Area of Potential Effect



Atch 2

Attachment 3: Project Plans for Hanger 6

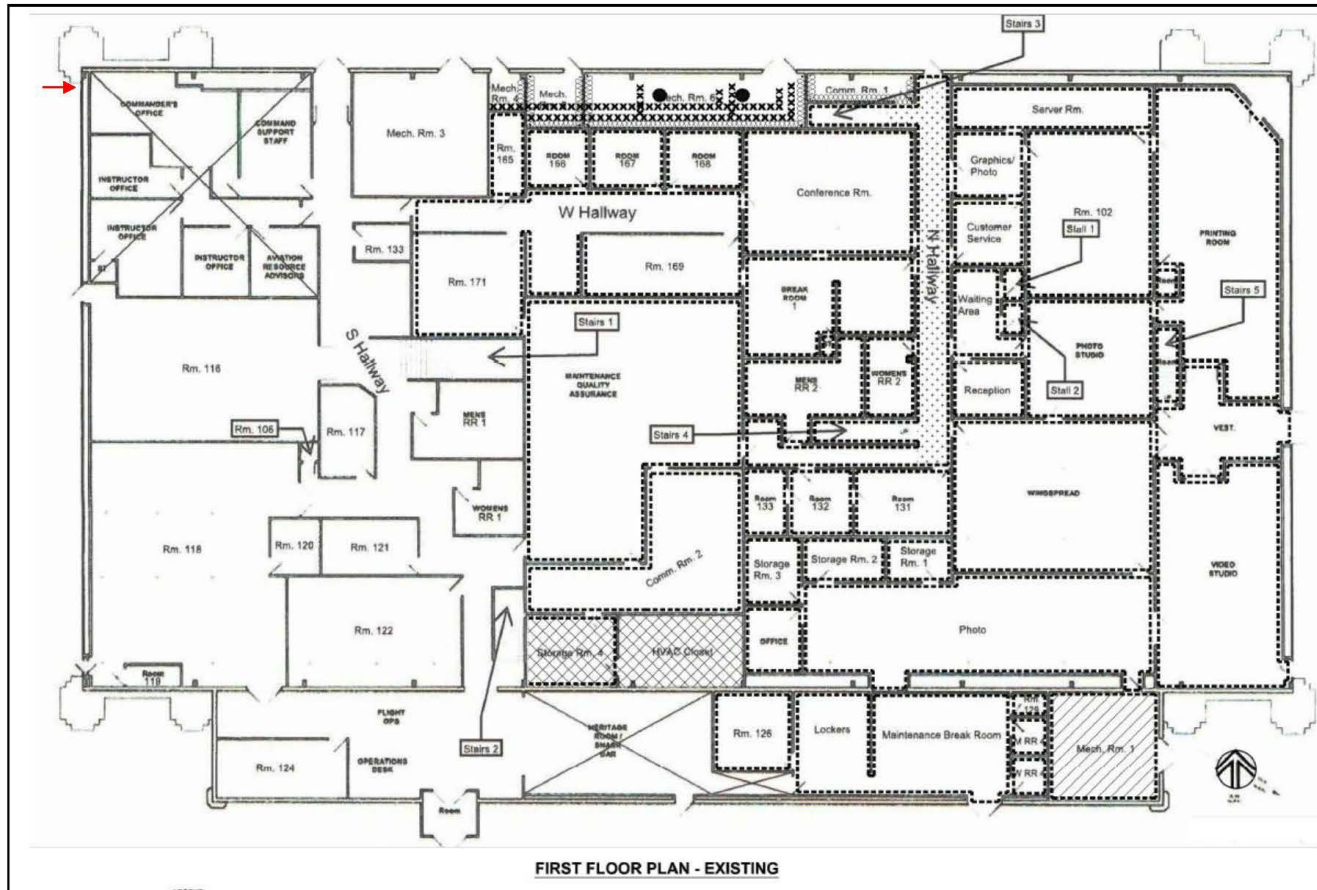


Figure 1. Existing First Floor Plan. Note: façade at top of image, existing rear addition at bottom of image. Though not noted on this plan, there is an existing door where the red arrow is indicated to the left. No alteration would occur to this door, note added to confirm no door is being added here as part of the proposed project.

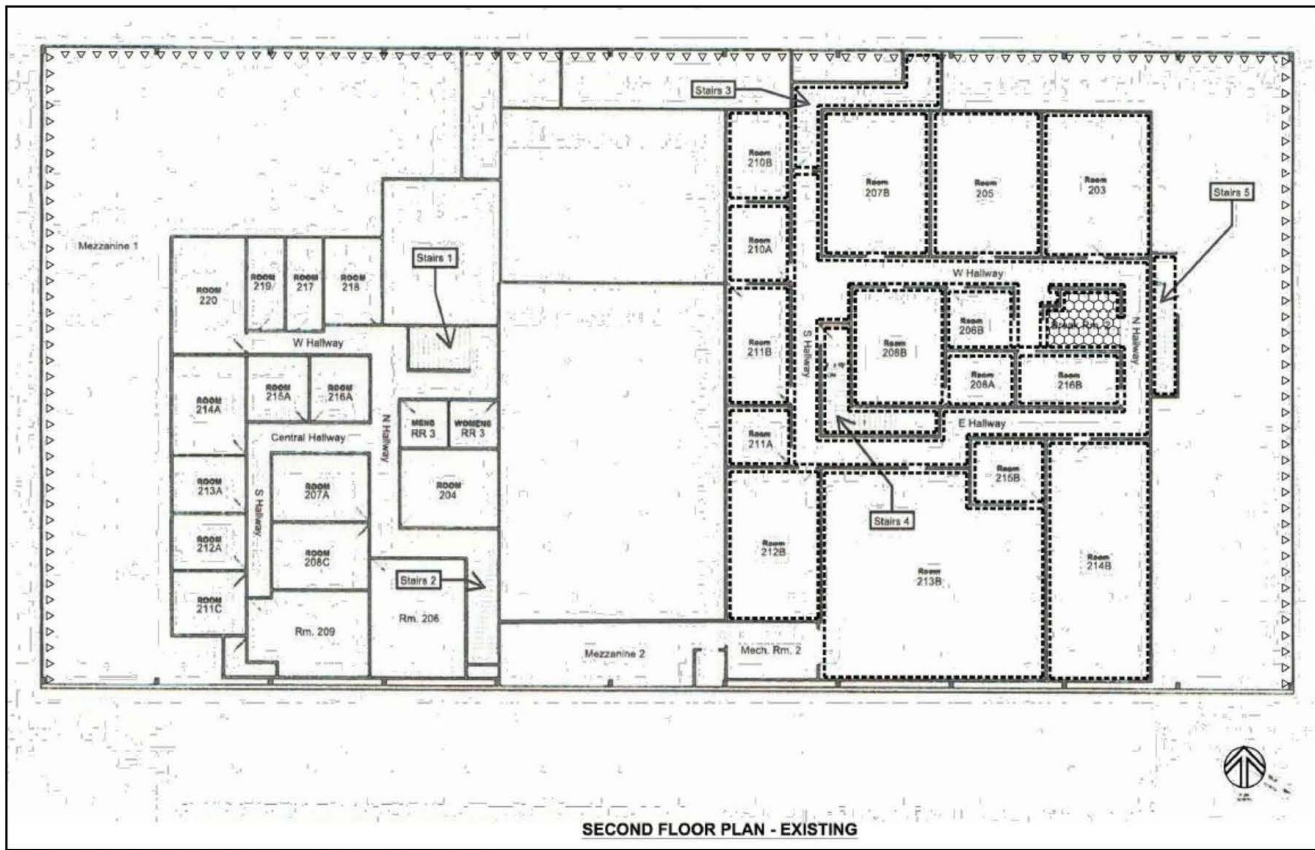


Figure 2. Existing Second Floor Plan. Note: façade at top of image.

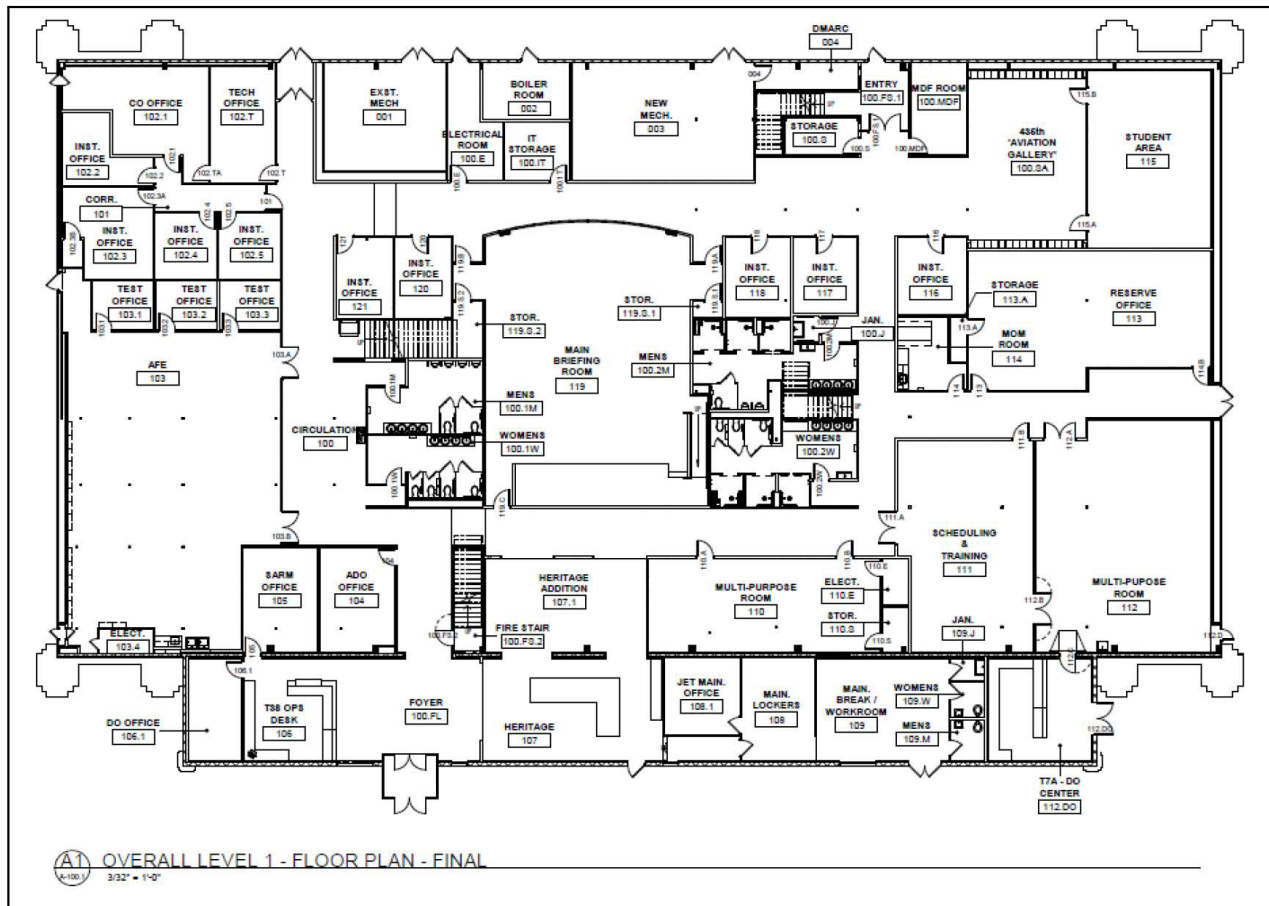


Figure 3. Proposed First Floor Plan. Note: façade at top of image, existing rear addition at bottom of image. No changes would occur to exterior materials or fenestration pattern or materials. All alteration to building interior.

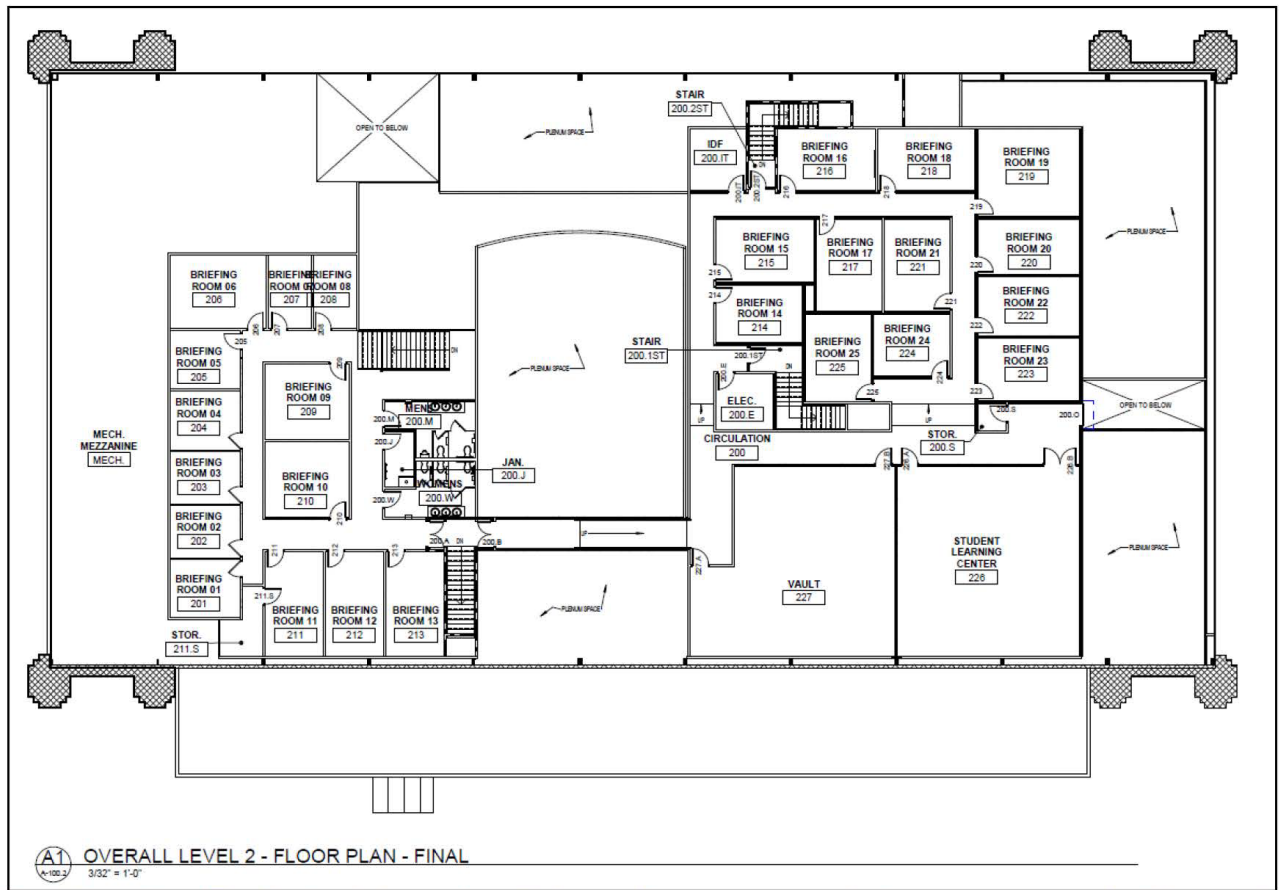


Figure 4. Proposed Second Floor Plan. Note: façade at top of image. No changes would occur to exterior materials or fenestration pattern or materials. All alteration to building interior.

Second response from the Texas State Historical Preservation Officer

From: Alex Toprac <Alex.Toprac@thc.texas.gov < Caution-Caution-mailto:Alex.Toprac@thc.texas.gov < Caution-mailto:Alex.Toprac@thc.texas.gov %3c Caution-Caution-mailto:Alex.Toprac@thc.texas.gov > > >>
Sent: Tuesday, October 19, 2021 9:49 AM
To: dayna.cramer@us.af.mil < Caution-mailto:dayna.cramer@us.af.mil > < Caution-Caution-mailto:dayna.cramer@us.af.mil >
Cc: nolan.swick@us.af.mil < Caution-mailto:nolan.swick@us.af.mil > < Caution-Caution-mailto:nolan.swick@us.af.mil > ; osmar.alaniz.3@us.af.mil < Caution-mailto:osmar.alaniz.3@us.af.mil > < Caution-Caution-mailto:osmar.alaniz.3@us.af.mil > ; alan.white@us.af.mil < Caution-mailto:alan.white@us.af.mil > < Caution-Caution-mailto:alan.white@us.af.mil > ; Henderson, Justin K <Justin_Henderson@nps.gov < Caution-Caution-mailto:Justin_Henderson@nps.gov < Caution-mailto:Justin_Henderson@nps.gov %3c Caution-Caution-mailto:Justin_Henderson@nps.gov > > >>; Olson, John P <john_p_olson@nps.gov < Caution-Caution-mailto:john_p_olson@nps.gov < Caution-mailto:john_p_olson@nps.gov %3c Caution-Caution-mailto:john_p_olson@nps.gov > > >>; Liverman, Astrid B <astrid_liverman@nps.gov < Caution-Caution-mailto:astrid_liverman@nps.gov < Caution-mailto:astrid_liverman@nps.gov %3c Caution-Caution-mailto:astrid_liverman@nps.gov > > >>; Lydia Woods-Boone <lydia.woods@thc.texas.gov < Caution-Caution-mailto:lydia.woods@thc.texas.gov < Caution-mailto:lydia.woods@thc.texas.gov %3c Caution-Caution-mailto:lydia.woods@thc.texas.gov > > >>
Subject: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph

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Ms. Dayna Cramer,

The Texas Historical Commission staff will still need photographs of the exterior of the building elevations and interior public spaces if applicable. I did note that in the 2011 PA, which has since been extended in duration through several amendments, Stipulation III (O.) states, "Interior modifications to non-public spaces of historic properties when the significance of the property does not include the interior space provided that the modifications are not visible from the exterior of the building."

I will need confirmation that the interior spaces of Hangar 63, Hangar 13, Building 220, Hangar 72, and Hangar 6 are not open to the public and therefore fall within the PA exception, above.

I did note that the scope of work includes replacement of exterior doors on Hangar 72, for which our staff requests additional information in the form of confirmation of those doors installation dates, photographs of those doors existing conditions, and cut sheets for the proposed replacement doors. The exterior sliding track doors of Hangar 72 are generally noted as a character defining feature in the National Register of Historic Places documentation, and therefore our staff requests additional documentation regarding whether those particular doors are original and whether or not they are the only examples of that type of door on Hangar 72 and that they be salvaged and stored for potential

restoration and reuse. It will additionally be important to provide more design information regarding the replacement doors.

Once we have received the requested documentation, I believe our staff may be able to make a no adverse effect determination with the condition that an updated proposal for the modifications to Hangar 72 be submitted via our online eTRAC system when the designs are more fully developed and that the doors be salvaged and stored as noted above. The general expectation is that any original historic doors be replaced in-kind, which will need to be verified in the developed design provided in the supplementary submission.

Much thanks.

Sincerely,

Alex Toprac



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Second reply to the Texas State Historical Preservation Officer and National Park Service

From: CRAMER, DAYNA A GS-13 USAF AETC 802 CES/CEIEA (Environmental Conservation) <dayna.cramer@us.af.mil < Caution-mailto:dayna.cramer@us.af.mil > >
Sent: Tuesday, October 19, 2021 5:53 PM
To: Olson, John P <john_p_olson@nps.gov < Caution-mailto:john_p_olson@nps.gov > >; Alex Toprac <Alex.Toprac@thc.texas.gov < Caution-mailto:Alex.Toprac@thc.texas.gov > >
Cc: SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil < Caution-mailto:nolan.swick@us.af.mil > >; ALANIZ, OSMAR H GS-12 USAF AETC 802 CES/CEIEA <osmar.alaniz.3@us.af.mil < Caution-mailto:osmar.alaniz.3@us.af.mil > >; WHITE, ALAN D GS-12 USAF AETC 802 CES/CEIEA <alan.white@us.af.mil < Caution-mailto:alan.white@us.af.mil > >; Henderson, Justin K <Justin_Henderson@nps.gov < Caution-mailto:Justin_Henderson@nps.gov > >; Liverman, Astrid B <astrid_liverman@nps.gov < Caution-mailto:astrid_liverman@nps.gov > >; Lydia Woods-Boone <Lydia.Woods@thc.texas.gov < Caution-mailto:Lydia.Woods@thc.texas.gov > >
Subject: RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph

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Alex/John,

I think there is some disconnect between what you all expect and our internal processes. The USAF is now requiring that the installation come to an agreement with SHPO/ACHP prior to signature of a Finding of No Significant Impact be on an Environmental Analysis or a Record of Decision on Environmental Impact Statement. These analysis are done very early in the planning process and are usually complete well in advance of any design or construction contract award. In many cases we will not have detailed information (drawings/specs) to provide to you all. We have the plans for Hangar 6 because the design has already been awarded. The nice thing about this requirement is that if you have that opportunity to include specific project stipulations prior to the project going to contracting for bid and award for design and/or construction.

I'm in contact with Nolan Swick to see about getting the required photos for Hangar 72.

For interior modifications: there is only one building at Randolph with a significant interior and it is listed individually: building 100, the administration building. This building also now houses a courtroom and the lobby is generally open to the public. All the buildings that are part of this undertaking are contributing to a NHL, meaning that the significance is tied to the district not the individual building's interior.

For public areas: in discussion with THC in 2016 we determined "public spaces" were those spaces that the general base populace could access. We have very few buildings were anyone with base access can walk into the public spaces like lobbies, stairways, or restrooms. Examples of buildings with "public spaces" are the gyms, enlisted/officer's clubs, schools, daycares, hobby shops, base exchanges, commissaries, hospitals and clinics, or courtrooms. Most other buildings have restricted access specific to the office that works there; hangars often have an additional layer of security (fence) because they have access to the flight line. The buildings associated with this undertaking will be locked down because of their access to the flightline and because of their use for training on the new airframe. We have been operating with this understanding of "public spaces", please let us know if we need to change what we consider "public spaces".

Salvage of hangar 72 doors: The doors referenced in this project are not the main sliding hangar doors for the bay mentioned in the NRHP listing. The doors being replaced for this project are hinged pedestrian doors. Many of the hangars converted to office space prior to my time have had the pedestrian doors replaced with storefront doors. For your awareness, our salvage program is currently on hold as we work to find new warehouse space.

If we need to meet to discuss this undertaking I am available next week.

We can also set up an in-person meeting to visit any areas of concern.

Please let me know if we need to set something up.

Dayna Cramer, GS-13, DAF
JBSA Environmental Conservation Chief
802 CES/CEIA
Main office: Camp Bullis B6201
Cell: 210-740-8340
dayna.cramer@us.af.mil < Caution-mailto:dayna.cramer@us.af.mil > < Caution-Caution-mailto:dayna.cramer@us.af.mil >
dayna.a.cramer.civ@army.mil < Caution-mailto:dayna.a.cramer.civ@army.mil > < Caution-Caution-mailto:dayna.a.cramer.civ@army.mil >

Third response from the Texas State Historical Preservation Officer

From: Alex Toprac <Alex.Toprac@thc.texas.gov < Caution-mailto:Alex.Toprac@thc.texas.gov > >
Sent: Wednesday, October 27, 2021 4:51 PM
To: Cramer, Dayna A CIV USAF 802 CES (USA) <dayna.a.cramer.civ@army.mil < Caution-mailto:dayna.a.cramer.civ@army.mil > >; Olson, John P <john_p_olson@nps.gov < Caution-mailto:john_p_olson@nps.gov > >
Cc: Swick, Nolan T CIV USAF AFCEC (USA) <nolan.swick@us.af.mil < Caution-mailto:nolan.swick@us.af.mil > >; Alaniz, Osmar H CIV USAF 802 CES (USA) <osmar.alaniz.3@us.af.mil < Caution-mailto:osmar.alaniz.3@us.af.mil > >; White, Alan D CIV USAF (USA) <alan.d.white16.civ@army.mil < Caution-mailto:alan.d.white16.civ@army.mil > >; Henderson, Justin K <Justin_Henderson@nps.gov < Caution-mailto:Justin_Henderson@nps.gov > >; Liverman, Astrid B <astrid_liverman@nps.gov < Caution-mailto:astrid_liverman@nps.gov > >; Lydia Woods-Boone <Lydia.Woods@thc.texas.gov < Caution-mailto:Lydia.Woods@thc.texas.gov > >
Subject: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Dayna,

I appreciate the clarification regarding public spaces and interior character defining features within the NHL District, which confirms exactly what I understood in reading through the NHL/NRHP nomination forms. In terms of what you noted about public spaces, I just wanted to confirm that Building 220 (Quartermaster Warehouse) does not currently have a public use as a gym, enlisted/officer's club, school, daycare, hobby shop, base exchange, commissary, hospital and clinic, or courtroom. Additionally, are any of the interior spaces of the historic buildings visible from the exterior? The PA language specifically refers to such spaces, so I wanted to make sure that our staff is performing our due diligence when it comes to reviewing alterations of such publicly visible interior spaces.

We will also still need photographs of the existing conditions of the buildings and associated areas of proposed exterior alterations, within the project APE at minimum.

I also wanted to ask whether there was any documentation on whether the pedestrian doors at Hangar 72, proposed for replacement, are the original historic doors at these locations? These are not called out in the NHL/NRHP form, and I do acknowledge that the salvage program is on hold, but do want to make sure that these doors are documented appropriately if they are historic.

If the replacement of the Hangar 72 pedestrian doors are the only exterior modification on the historic buildings noted in the project, and all the proposed interior alteration are in spaces that are not open or visible to the public, then I can certainly provide a "no adverse effect" determination with the condition that additional information on the replacement doors be provided when available in the future and before installation.

Much thanks again, and hopefully we can set aside some time in the near future to discuss ongoing JBSA undertakings.

Alex Toprac

Third reply to the Texas State Historical Preservation Officer and National Park Service

From: Cramer, Dayna A CIV USAF 802 CES (USA) <dayna.a.cramer.civ@army.mil>
Sent: Wednesday, October 27, 2021 5:56 PM
To: Alex Toprac <Alex.Toprac@thc.texas.gov>; Olson, John P <john_p_olson@nps.gov>
Cc: Swick, Nolan T CIV USAF AFCEC (USA) <nolan.swick@us.af.mil>; Alaniz, Osmar H CIV USAF 802 CES (USA) <osmar.alaniz.3@us.af.mil>; White, Alan D CIV USAF (USA) <alan.d.white16.civ@army.mil>; Henderson, Justin K <Justin_Henderson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Lydia Woods-Boone <Lydia.Woods@thc.texas.gov>
Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)
CAUTION: External Email – This email originated from outside the THC email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.
CLASSIFICATION: UNCLASSIFIED

Alex,
 Thank you for your consideration.
 Below is the breakdown of space in B220. The only public space in this building is the lobby of the post office, which is not part of the project.

Space Allocations (7)							
Type	CAT Code	Title	Customer Name	Office Symbol	Description	Size	MDI
	610311	General Administrative Building	502 CS	CC	DOCUMENTATION STAGING FACILITY	3,394 SF	59
	730443	Postal Facility	502 FSS RAN	CC	POST OFFICE	8,211 SF	52
	610128	General Administrative Building	502 ABW RAN		BASE PERSONNEL OFFICE	1,834 SF	59
	610128	General Administrative Building	502 ABW RAN		BASE PERSONNEL OFFICE	903 SF	59
	217762	Electronic and Communication Maintenance Shop	12 OSS	OSS	SHOP, NAVIGATIONAL AIDS	2,940 SF	75
	131111	Communications Building	502 CS	CC	TELECOMMUNICATIONS FACILITY	8,576 SF	80
	730443	Postal Facility	502 FSS RAN	CC	POST OFFICE	2,767 SF	52

We will get you the photos as soon as possible, which is likely by 15 Nov.

For B72 The pedestrian doors were likely not original as many were changed before listing. The photos will show what is currently installed.

Thank you again.

//SIGNED//

Dayna Cramer

Chief, Environmental Conservation(Customer Evaluation) < Caution-
https://ice.disa.mil/index.cfm?fa=card&sp=143225&s=1024&dep=*DoD&sc=5 >
 Hunting Program(Customer Evaluation) < Caution-
https://ice.disa.mil/index.cfm?fa=card&sp=136010&s=1024&dep=*DoD&sc=15 >
 802 Civil Engineer Squadron
 Joint Base San Antonio
dayna.cramer@us.af.mil < Caution-mailto:dayna.cramer@us.af.mil >
dayna.a.cramer.civ@mail.mil < Caution-mailto:dayna.a.cramer.civ@mail.mil >
 Gov Cell: 210-740-8340

Fourth response from the Texas State Historical Preservation Officer

From: "Alex Toprac" <Alex.Toprac@thc.texas.gov>
Date: Monday, November 8, 2021 at 4:21:59 PM
To: "Cramer, Dayna A CIV USAF 802 CES (USA)" <dayna.a.cramer.civ@army.mil>
Cc: "Lydia Woods-Boone" <Lydia.Woods@thc.texas.gov>
Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

All active links contained in this email were disabled. Please verify the identity of the sender, and confirm the authenticity of all links contained within the message prior to copying and pasting the address to a Web browser.

Dayna,

I just realized in going over the past documentation for this project. That no additional plans were received for the proposed new construction of the GBTS & MTS Facilities. The rendering of the GBTS Facility in the initial submission was helpful, but we will need to ensure these two new buildings are appropriately massed and constructed with compatible materials relative to the Randolph Field NHLD. Are there any additional rendering and plans for these two proposed facilities that can be shared?

Other than the additional information on these two new construction buildings, I believe our staff is only waiting for the photographs of the existing doors on Hangar 72 and details on the proposed replacement doors.

It would be extremely helpful if you and I could set up some time to discuss all the ongoing projects at JBSA over the phone, as I am still getting up-to-speed in temporarily covering these projects until our office is able to employ new review staff to cover military projects.

Much thanks.



Alex Toprac
Project Reviewer, Federal & State Review Program
Division of Architecture
P.O. Box 12276, Austin, Texas 78711-2276
Phone: +1 512 463 6183



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<https://web.cvent.com/event/b9ed31fe-db33-4aa0-8987-99604f923230/summary?locale=en-US&i=C3ALY5wzf02YRLuK5TShrA> >

Fourth reply to the Texas State Historical Preservation Officer and National Park Service

From: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>

Sent: Tuesday, November 9, 2021 7:05 PM

To: Cramer, Dayna A CIV USAF 802 CES (USA) <dayna.a.cramer.civ@army.mil>; CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>; Alex Toprac <Alex.Toprac@thc.texas.gov>

Cc: Lydia Woods-Boone <lydia.woods@thc.texas.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Henderson, Justin K <Justin_Henderson@nps.gov>; Olson, John P <john_p_olson@nps.gov>; SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil>; ALANIZ, OSMAR H GS-12 USAF AETC 802 CES/CEIEA <osmar.alaniz.3@us.af.mil>

Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

The requested information has been uploaded to eTrac and also sent via SAFE file exchange due to the size of the file.

Please be on the lookout for an email from SAFE.

Please let us know if you have any other questions.

Dayna Cramer, GS-13, DAF
JBSA Environmental Conservation Chief
802 CES/CEIEA
Main office: Camp Bullis B6201
Cell: 210-740-8340
dayna.cramer@us.af.mil
dayna.a.cramer.civ@army.mil



DEPARTMENT OF THE AIR FORCE
502D AIR BASE WING
JOINT BASE SAN ANTONIO



November 9, 2021

Dayna Cramer
802 CES/CEIEA
1555 Gott St
JBSA Lackland TX 78236-5645

Director Mark Wolfe
Texas Historical Commission
P.O. Box 12276, Capitol Station
Austin TX 78711-2276

Subject: Supplemental Information for eTrac # 20220476

Dear Director Wolfe

This letter needs to be sent to the Federal and/or Military reviewer(s) for your office. The letter contains supplemental information for USAF project: T-7A recapitalization.

- **Confirm interior spaces of Hangars 6, 13, 63, and 72 and Building 220 are not open to the public and fall within PA exception.**
 - For public areas: in discussion with THC in 2016 we determined “public spaces” were those spaces that the general base populace could access. We have very few buildings were anyone with base access can walk into the public spaces like lobbies, stairways, or restrooms. Examples of buildings with “public spaces” are the gyms, enlisted/officer’s clubs, schools, daycares, hobby shops, base exchanges, commissaries, hospitals and clinics, or courtrooms. Most other buildings have restricted access specific to the office that works there; hangars often have an additional layer of security (fence) because they have access to the flight line. The buildings associated with this undertaking will be locked down because of their access to the flight line and because of their use for training on the new airframe. We have been operating with this understanding of “public spaces”, please let us know if we need to change what we consider “public spaces”.
 - Building 220, only the Maintenance Shop is being modified.

Type	CAT Code	Title	Customer Name	Office Symbol	Description	Size	MDI
	610311	General Administrative Building	502 CS	CC	DOCUMENTATION STAGING FACILITY	3,394 SF	59
	730443	Postal Facility	502 FSS RAN	CC	POST OFFICE	8,211 SF	52
	610128	General Administrative Building	502 ABW RAN		BASE PERSONNEL OFFICE	1,834 SF	59
	610128	General Administrative Building	502 ABW RAN		BASE PERSONNEL OFFICE	903 SF	59
	217762	Electronic and Communication Maintenance Shop	12 OSS	OSS	SHOP, NAVIGATIONAL AIDS	2,940 SF	75
	131111	Communications Building	502 CS	CC	TELECOMMUNICATIONS FACILITY	8,576 SF	80
	730443	Postal Facility	502 FSS RAN	CC	POST OFFICE	2,767 SF	52

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- **Provide photos of Hangar 72 doors.**
 - See Attachment 1
- **Provide additional rendering and plans for new GBTS and MTS Facilities.**
 - Exterior facility finishes match the JBSA Randolph Installation Facility Standards found at <https://www.wbdg.org/ffc/af-afcec/installation-facilities-standards-ifs/jbsa-randolph-afb-ifs>
 - See Attachment 2, GBTS Drawings
 - See Attachment 3, MTS Drawings

We appreciate the opportunity to provide additional information and we request your comment and/or concurrence on the finding of **no effect on historic properties**.

JBSA appreciates your participation in the Section 106 process and looks forward to your comment/concurrence regarding this undertaking. Please contact Dayna Cramer at (210) 740-8340, or at dayna.cramer@us.af.mil, for questions and/or concerns regarding this request. If we do not receive your comments and/or concurrence within the required 30 days, we will assume concurrence and proceed with the undertaking as described.

Sincerely

DAYNA CRAMER, GS-13, DAF
JBSA Cultural Resources

3 Attachments:

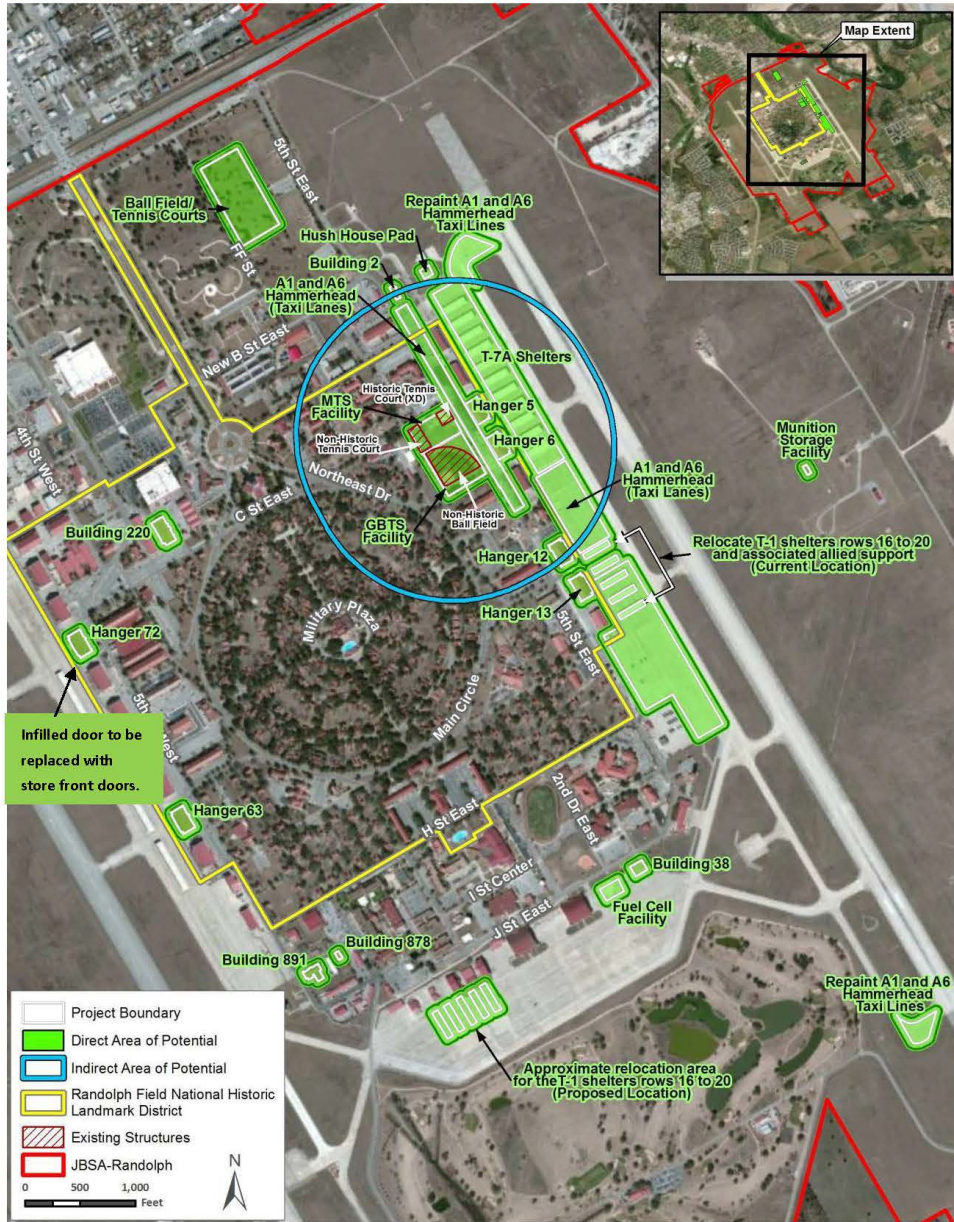
1. Hangar 72 map and photos
2. GBTS Drawings
3. MTS Drawings

cc:

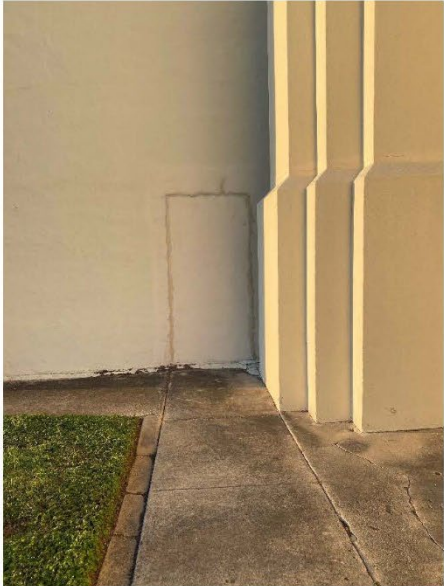
Astrid Livermore, Ph.D.
Intermountain Region
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225

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Attachment 1: Hangar 72 Door Location and Photos



Hangar 72 Doors, on Lean-to Addition



Infilled door to be replaced with storefront glass doors, SW Corner



Door, NW Corner

Atch 1 (Pg 2 of 2)

Note: Attachments 2 and 3 are saved in the projects administrative record because they are over 600 pages in length.

Fifth response from the Texas State Historical Preservation Officer (2 emails)

From: Alex Toprac <Alex.Toprac@thc.texas.gov>
Sent: Wednesday, November 10, 2021 11:17 AM
To: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>
Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

Dayna,

Thank you for the quick follow up. I have gone through the supplementary documentation and am just waiting to touch base with the good folks at the NPS Intermountain Regional Office before sending your our determinations.

Much thanks again.

Alex Toprac

From: Alex Toprac <Alex.Toprac@thc.texas.gov>
Sent: Friday, November 12, 2021 2:18 PM
To: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>
Cc: Olson, John P <john_p_olson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Henderson, Justin K <Justin_Henderson@nps.gov>; Lydia Woods-Boone <Lydia.Woods@thc.texas.gov>
Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

Dayna,

I was able to touch base with the good folks over at the National Park Service Intermountain Regional Office, and we all agreed that we are going to need more time to review the design plans for the two new buildings (MTS & GBTS) in detail. I will be sending a determination for the Hangar 72 door replacement along with statement acknowledging that the proposed interior modifications to Hangar 63, Hangar 13, Building 220, Hangar 72, and Hangar 6, are all in non-public interior spaces and therefore exempt from review according to the Programmatic Agreement between our agencies.

Our staff will go ahead and create a new supplemental track for the design plan documentation, submitted on November 09, 2021, to allow an additional 30 day review period from the date of receipt. I would like to request that you email me a cover letter restating the purpose and need of the new construction and any insight you can provide on their designs and chosen location within the Randolph Field National Historic Landmark District.

Much thanks.

Alex Toprac

Fifth reply to the Texas State Historical Preservation Officer and National Park Service

From: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>

Sent: Monday, November 15, 2021 1:15 PM

To: Alex Toprac <Alex.Toprac@thc.texas.gov>; CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>

Cc: Olson, John P <john_p_olson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Henderson, Justin K <Justin_Henderson@nps.gov>; Lydia Woods-Boone <Lydia.Woods@thc.texas.gov>

Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

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I'm a bit confused about why the MTS & GBTS projects are now an issue. We were not made aware of any concerns during the previous reviews. Can you all please explain the concern?

Dayna Cramer, GS-13, DAF
JBSA Environmental Conservation Chief
802 CES/CEIEA
Main office: Camp Bullis B6201
Cell: 210-740-8340
dayna.cramer@us.af.mil
dayna.a.cramer.civ@army.mil

Sixth response from the Texas State Historical Preservation Officer

From: Alex Toprac <Alex.Toprac@thc.texas.gov>

Sent: Tuesday, November 16, 2021 5:28 PM

To: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>

Cc: Olson, John P <john_p_olson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Henderson, Justin K <Justin_Henderson@nps.gov>; Lydia Woods-Boone <Lydia.Woods@thc.texas.gov>

Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

Dayna,

Unfortunately, due to the initial proposal being very extensive in scope, the two new construction buildings were difficult to identify as being a high priority item in terms of our review. As they are both proposed within the district, it is really important that our staff and the National Park Service staff have the opportunity to confirm that the building designs are appropriate for the proposed location within the NHL. I have done a more cursory preliminary review of the construction documents, but need to look at the material details a bit more and correspond with the NPS staff before getting you a definitive determination.

Much thanks, and I will keep you updated on our review progress.

Alex Toprac

Sixth reply to the Texas State Historical Preservation Officer and National Park Service

From: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>

Sent: Thursday, November 18, 2021 10:00 AM

To: Alex Toprac <Alex.Toprac@thc.texas.gov>; CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>

Cc: Olson, John P <john_p_olson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Henderson, Justin K <Justin_Henderson@nps.gov>; Lydia Woods-Boone <Lydia.Woods@thc.texas.gov>; SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil>; ALANIZ, OSMAR H GS-12 USAF AETC 802 CES/CEIEA <osmar.alaniz.3@us.af.mil>

Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

Please see the [requested](#) cover letter restating the purpose and need of the new construction with insight on design and chosen location within the Randolph Field National Historic Landmark District.

Dayna Cramer, GS-13, DAF
JBSA Environmental Conservation Chief
802 CES/CEIEA
Main office: Camp Bullis B6201
Cell: 210-740-8340
dayna.cramer@us.af.mil
dayna.a.cramer.civ@army.mil



DEPARTMENT OF THE AIR FORCE
502D AIR BASE WING
JOINT BASE SAN ANTONIO



November 18, 2021

Dayna Cramer
802 CES/CEIEA
1555 Gott St
JBSA-Lackland TX 78236

Director Mark Wolfe
Texas Historical Commission
P.O. Box 12276, Capitol Station
Austin TX 78711-2276

Subject: Supplemental Information for eTrac #202111701

Dear Director Wolfe

This letter needs to be sent to the Federal and/or Military reviewer(s) for your office. The letter contains supplemental information for USAF project: T-7A recapitalization.

As stated in the previous letters, the Air Force is proposing to recapitalize its flight training program with newer and more capable T-7A Red Hawk aircraft JBSA, Texas. The purpose of the proposed action is to implement the T-7A recapitalization program at JBSA-Randolph to establish a source of T-7A instructor pilots as well as prepare pilots to operate the more technologically advanced aircraft. The proposed action is needed because the current training practices with the older T-38C aircraft fail to prepare pilots for the technological advancements of fourth and fifth generation aircraft. By 2031, more than 60% of the Combat Air Force will be comprised of fifth generation aircraft, which requires a modern and capable training platform with capabilities beyond that currently available in the T-38C. Training systems provided with the newer T-7A aircraft allow for enhanced and improved flight and simulator training.

The purpose of the construction of the Ground Based Training System (GBTS) and Maintenance Training System (MTS) facilities is to provide the necessary flight simulator and maintenance training infrastructure for the new T-7A aircraft. The GBTS and MTS facilities are needed because the new T-7A aircraft require different and more technologically advanced simulator and maintenance training equipment and infrastructure than the current infrastructure for the T-38C aircraft. The following selection standards were identified to determine the facility alternatives that would meet the proposed action's purpose and need.

1. An alternative must not result in operational constraints. Operational constraints would occur if a currently ongoing operation, activity, or mission were limited by proposed facility construction or renovation activities.
2. The facility construction must agree with installation land use patterns and be compatible with surrounding uses. Facilities requiring flightline access must be sited accordingly. The facility construction or renovation must provide an efficient solution to support the intended use.
3. The action must accommodate the updated capabilities of the T-7A aircraft and the associated changes in training operations.
4. New facility construction must have minimal environmental impact with no effect on existing wetlands or floodplains.

One alternative site was considered for the MTS facility. The alternative would convert Hangar 13 to an aircraft MTS facility. Conversion would require renovation of 30,000 ft² of hangar space for repairs or modifications to fire suppression, electrical, heating and air conditioning systems, interior partitions, floor, ceiling, and interior finishes to provide a complete and useable facility. Because this alternative would interrupt and relocate existing activities at Hangar 13, it fails to satisfy Selection Standard 1 requiring avoidance of operational constraints. Therefore, this alternative has been dismissed from further analysis.

One alternative site was considered for the GBTS facility. The alternative would convert Building 745 to a GBTS facility. Conversion would require renovation of 32,490 ft² of interior space for addition or alteration of the fire suppression systems, utilities, pavements, communications, site improvements, and associated supporting facilities to provide a complete and useable facility. This alternative would displace 90 personnel from the Air Force Audit Agency. Therefore, this alternative fails to meet Selection Standards 1 and 2 because it is not an operationally efficient solution and displaces a current function. Therefore, this alternative has been dismissed from further analysis.

The proposed sites of the GBTS and MTS facilities were necessary to provide an efficient solution to support the intended use by co-locating these simulator and training functions adjacent to the squadron operations and maintenance functions for the T-7A. The facility designs (submitted on 9 November 2021) comply with the JBSA-Randolph Installation Facility Standards.

We appreciate the opportunity to provide additional information and we request your comment and/or concurrence on the finding of no effect on historic properties.

JBSA appreciates your participation in the Section 106 process and looks forward to your comment/concurrence regarding this undertaking. Please contact Dayna Cramer at (210) 740-8340, or at dayna.cramer@us.af.mil, for questions and/or concerns regarding this request. If we do not receive your comments and/or concurrence within the required 30 days, we will assume concurrence and proceed with the undertaking as described.

Sincerely

Dayna
Cramer

Digitally signed
by Dayna Cramer
Date: 2021.11.18
09:57:49 -06'00'

DAYNA CRAMER, GS-13, DAF
JBSA Cultural Resources

cc:
Astrid Livermore, Ph.D.
Intermountain Region
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225

Seventh response from the Texas State Historical Preservation Officer

From: Alex Toprac <Alex.Toprac@thc.texas.gov>
Sent: Wednesday, November 24, 2021 9:26 AM
To: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>
Cc: Lydia Woods-Boone <Lydia.Woods@thc.texas.gov>
Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

Dayna,

I have had some important detailed conversations with the NPS Intermountain Regional Office staff and we are working to prepare some feedback and potential conditions for the MTS & GBTS designs that we believe are achievable without major revisions.

Although we will soon have a full time employee assigned to our military projects, I personally encourage JBSA to begin consultation earlier in the planning process for projects that effect historic resources in order to ensure there are opportunities to avoid or minimize potential adverse effects.

Much thanks, have a great Thanksgiving, and we look forward to providing a final determination for this project in the next week or two.

Alex Toprac

Continuation of seventh response from the Texas State Historical Preservation Officer

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>
Sent: Friday, December 3, 2021 12:40 PM
To: SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil>; reviews@thc.state.tx.us; john_p_olson@nps.gov; alexander.shane@thc.texas.gov
Subject: [Non-DoD Source] Section 106 Submission



TEXAS HISTORICAL COMMISSION
real places telling real stories

Re: Project Review under Section 106 of the National Historic Preservation Act
THC Tracking #202203586
Date: 12/03/2021
T-7A Recapitalization
JBSA-Randolph

Description: Supplemental information on a few projects of concern

Dear Nolan Swick:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Alex Toprac, has completed its review and has made the following determinations based on the information submitted for review:

Above-Ground Resources

- No adverse effects on historic properties provided that the following conditions are met.

We have the following comments: After thorough review of the submitted project design plans and consultation with the National Park Service Intermountain Regional Office staff, the Texas Historical Commission Division of Architecture staff, led by Alex Toprac, has determined the proposed scope of work for the construction of the Ground Based Training System (GBTS) and Maintenance Training System (MTS) facilities will have no adverse effect on the National Historic Landmark Randolph Field Historic District with the condition that swatch samples of the Cambridge White and 19167 colors selected for the exterior finishes be mocked up against one of the historic stucco buildings surrounding the proposed location, and potentially be changed if determined to be inappropriate and visually detracting from those historic resources. Our staff additionally determined that the overall height and massing of the two new buildings, although significant in scale, is acceptably similar to the closest historic buildings, and therefore will avoid an adverse visual effect on those particular historic resources and the Randolph Field Historic District on the whole. As the submitted design plans are at 100% Design Development, it is fortunate that our staff has minimal concerns regarding the proposed plans, and encourages Joint Base San Antonio's staff to begin consultation on future projects as early as possible in

the planning process to best ensure the ability to incorporate our feedback to minimize and/or avoid potential adverse effects. The Texas Historical Commission project review staff looks forward to visiting the various historic sites of Joint Base San Antonio and discussing how to improve our agencies' Section 106 coordination efforts together in the future.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: alex.toprac@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,

A handwritten signature in black ink that reads "Alex Toprac". The signature is written in a cursive style with a long horizontal flourish at the end.

for Mark Wolfe, State Historic Preservation Officer
Executive Director, Texas Historical Commission

Please do not respond to this email.

cc: john_p_olson@nps.gov,alexander.shane@thc.texas.gov</p

Seventh reply to the Texas State Historical Preservation Officer and National Park Service

From: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>
Sent: Tuesday, December 7, 2021 6:35 PM
To: Henderson, Justin K <Justin_Henderson@nps.gov>; CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>; Alex Toprac <Alex.Toprac@thc.texas.gov>
Cc: Olson, John P <john_p_olson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Lydia Woods-Boone <lydia.woods@thc.texas.gov>; SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil>; ALANIZ, OSMAR H GS-12 USAF AETC 802 CES/CEIA <osmar.alaniz.3@us.af.mil>; Katharine R. Kerr <kkerr@achp.gov>
Subject: RE: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

Please see attached paint color comparison information.

We look forward to setting up a tour with you all in 2022. Please keep in mind the last time we did a windshield tour with your offices it took 3 days. While we have you here we would very much like to discuss projects like BASH Vegetation Management at Randolph and more importantly the renewal of our Programmatic Agreement. Would you be to commit to a week here?

Dayna Cramer, GS-13, DAF
JBSA Environmental Conservation Chief
802 CES/CEIEA
Main office: Camp Bullis B6201
Cell: 210-740-8340
dayna.cramer@us.af.mil
dayna.a.cramer.civ@army.mil



DEPARTMENT OF THE AIR FORCE
502D AIR BASE WING
JOINT BASE SAN ANTONIO



December 7, 2021

Dayna Cramer
802 CES/CEIEA
1555 Gott St
JBSA Lackland TX 78236-5645

Director Mark Wolfe
Texas Historical Commission
P.O. Box 12276, Capitol Station
Austin TX 78711-2276

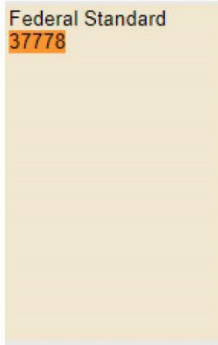
Dear Director Wolfe

This letter needs to be sent to the Federal and/or Military reviewer(s) for your office. The letter contains supplemental information for USAF project: T-7A Recapitalization at JBSA-Randolph. eTrac #s: 202111701 and 202201476.

JBSA agrees with both the Texas Historical Commission and National Park Service that projects should be consulted early in the planning process. To facilitate consultation we will be asking that you all consider incorporating a phased consultation process into the next Programmatic Agreement. This will be further discussed in a separate letter.

Because the design was not completed at base level we do not have samples to photograph in front of the building for comparison. Please note the yellow color in the photos of Hangar 72 was the result of the photos being taken at sunset. The paint color comparison that we can provide is below: Federal Standard 37778 is used as the stand color for most buildings at JBSA-Randolph. The only the exceptions being buildings 100, 102, and 200. These buildings at the main entry round-about are painted with a whiter color. This color standard can be found at <https://www.federalstandardcolor.com/>.

Federal Standard
37778



The Cambridge White below was pulled from the manufacturers website: <https://www.centria.com/tools-and-resources/color-selector>

995
Cambridge White



Mission ~ Wingman ~ Partners

As you can see from this comparison these colors are very similar. See additional photos of buildings adjacent to the site and renderings of the proposed GBTS and MTS facilities in Attachment 1.

We appreciate the opportunity to provide additional information and we request your comment and/or concurrence on the finding of **no effect on historic properties**

JBSA appreciates your participation in the Section 106 process and looks forward to your comments and/or concurrence regarding this undertaking. Please contact Dayna Cramer at (210) 740-8340, or at dayna.cramer@us.af.mil, for questions and/or concerns regarding this request. If we do not receive your comments and/or concurrence within the required 30 days, we will assume concurrence and proceed with the undertaking as described.

Sincerely

Dayna
Cramer

Digitally signed
by Dayna Cramer
Date: 2021.12.07
18:25:00 -06'00'

DAYNA CRAMER, GS-13, DAF
JBSA Cultural Resources

Attachment

1. Renderings and Photos for Color Comparison

cc:

Astrid Livermore, Ph.D.
Intermountain Region
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225

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Attachment 1: Photos and Rendering for Paint Color Comparison



**T-7 GROUND BASED TRAINING SYSTEM & MAINTENANCE TRAINING SYSTEM CENTRALIZED TRAINING FACILITY
JOINT BASE SAN ANTONIO (JBSA) - RANDOLPH, TEXAS**



Rendering of proposed GBTS and MTS



Building 394, NW of the proposed construction site

Attachment 1: Photos and Rendering for Paint Color Comparison



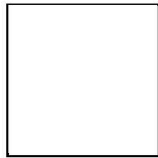
Building 399, SE of the proposed construction site



Hangar 5, East of the proposed construction site

Eighth and final response from the Texas State Historical Preservation Officer. This letter provides concurrence of No Adverse Effects on Historic Properties.

From: noreply@thc.state.tx.us <noreply@thc.state.tx.us>
Sent: Friday, December 17, 2021 9:10 AM
To: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>; reviews@thc.state.tx.us
Subject: [Non-DoD Source] Section 106 Submission



Re: Project Review under Section 106 of the National Historic Preservation Act
THC Tracking #202204303
Date: 12/17/2021
T-7A Recapitalization
JBSA-Randolph
Cibolo, TX 78150

Description: Paint color sample comparison.

Dear CRM:

Thank you for your submittal regarding the above-referenced project. This response represents the comments of the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC), pursuant to review under Section 106 of the National Historic Preservation Act.

The review staff, led by Alex Toprac, has completed its review and has made the following determinations based on the information submitted for review:

Above-Ground Resources

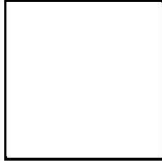
- No adverse effects on historic properties.

We have the following comments: The Texas Historical Commission Division of Architecture staff, led by Alex Toprac, has completed their review of the submitted additional information regarding the selected exterior paint finishes for the proposed GBTS and MTS facilities and determined that the project will have no adverse effect on the Randolph Field National Historic Landmark District.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this review process, and for your efforts to preserve the irreplaceable heritage of Texas. If the project changes, or if new historic properties are found, please contact the review staff. If you have any questions concerning our review or if we can be of further assistance, please email the following reviewers: alex.toprac@thc.texas.gov.

This response has been sent through the electronic THC review and compliance system (eTRAC). Submitting your project via eTRAC eliminates mailing delays and allows you to check the status of the review, receive an electronic response, and generate reports on your submissions. For more information, visit <http://thc.texas.gov/etrac-system>.

Sincerely,



for Mark Wolfe, State Historic Preservation Officer
Executive Director, Texas Historical Commission

Please do not respond to this email.

Initial letter to the National Park Service



DEPARTMENT OF THE AIR FORCE
12TH FLYING TRAINING WING
JOINT BASE SAN ANTONIO – RANDOLPH TEXAS

21 June 2021

Dayna Cramer
Cultural Resources Manager
802 CES/CEIEA
1555 Gott Street
JBSA-Lackland TX 78236

Justin Henderson
Intermountain Region
12795 West Alameda Parkway
PO Box 25287
Denver, CO 80225

Dear Mr. Henderson:

The United States Air Force (Air Force) is proposing to recapitalize its flight training program with newer and more capable T-7A Red Hawk aircraft at Joint Base San Antonio (JBSA), Texas. Recapitalization is the phased acquisition of the new generation T-7A aircraft and construction and upgrade of specific facilities to support the training, operation, and maintenance of the T-7A aircraft. To consider various environmental concerns, the Air Force is engaging early with the appropriate resource and regulatory agencies as it formulates the undertaking. The Air Force is also preparing an Environmental Impact Statement under the National Environmental Policy Act to evaluate potential environmental impacts associated with the T-7A recapitalization at JBSA.

In accordance with Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations at 36 CFR Part 800, the Air Force and JBSA are initiating consultation and advising you of a proposed undertaking that has the potential to affect historic properties, including the Randolph Field National Historic Landmark District (NHLD).

The undertaking would entail the phased introduction of T-7A aircraft and phased reduction of the T-38C aircraft currently operating from JBSA-Randolph; new intensities of flight operations at JBSA-Randolph, JBSA-Lackland, and Seguin Auxiliary Airfield including nighttime operations at JBSA-Randolph and JBSA-Lackland; and the introduction of approximately 300 new personnel at JBSA-Randolph. T-7A operations would occur within the same designated military airspace boundaries currently used for T-38C operations, and no changes to established Special Use Airspace configurations (i.e., size, shape, or location) would occur. Additionally, construction for six military construction (MILCON) projects and 13 facilities sustainment, restoration, and modernization (FSRM) projects would occur at JBSA-Randolph to provide modern facilities and infrastructure to support the T-7A aircraft's maintenance, training, and operational requirements. The MILCON and FSRM projects include new building construction including placement of four 15-foot-tall antennae on top of a new building (arranged along roof ridge), renovation of several existing buildings and hangars, repainting taxi lines, and relocation of displaced athletic facilities. The undertaking's potential to impact historic properties is from the MILCON and FSRM projects at JBSA-Randolph. Details on the MILCON and FSRM projects and their individual assessment of effect can be found in **Attachment 1**. No ground disturbance would occur at JBSA-Lackland and Seguin Auxiliary Airfield.

The Area of Potential Effect (APE) for this undertaking is defined as the potential impact area from all activities. The APE includes areas of potential direct and indirect effects. Direct effects include those from ground disturbance, vibration, building modification, and staging and equipment storage. Indirect effects include those from noise and aesthetic interference. For this undertaking, the direct APE is defined as all buildings proposed for interior and exterior alteration, including a 50-foot buffer around those buildings to account for construction staging; all areas of new construction; all landscape features such as the existing ball field, tennis court, and taxi lanes proposed for alteration; and the location of the proposed ball field. The indirect APE is an area 0.25 miles in radius centered around the GBTS facility where four 15-foot-tall antennae would be located on top of the building. The indirect APE includes the full distance (0.25 miles) that the 15-foot-tall antennae are anticipated to be present within the setting of adjacent facilities, though actual viewing distance is anticipated to be much shorter in some locations depending on the presence of adjacent buildings, structures, utility components, and foliage. The direct and indirect APE total approximately 56 acres and are shown on **Attachment 2**. The APE does not include any portions of JBSA-Lackland and Seguin Auxiliary Airfield because no ground disturbance would occur at these installations. Additionally, the APE does not include areas within the airspace where the T-7A would perform operations because T-7A flight training would occur at a relatively high altitude in previously defined military airspace and would have no potential to impact historic properties.

The Air Force has conducted both architectural and archaeological surveys within the APE. Architectural surveys have resulted in the identification of several historic properties, including the Randolph Field NHLD, which was listed in the National Register of Historic Places (NRHP) in 1996 and designated a National Historic Landmark in 2001. The district is composed of 350 contributing resources and 47 non-contributing resources. Other historic properties at JBSA-Randolph include two individually eligible properties dating to the Cold War era (Buildings 40 and 41), which were determined eligible for the NRHP in 2002 during a Cold War-Era buildings and structures inventory and assessment. Of the historic properties at JBSA-Randolph, ten are located within the APE including Randolph Field NHLD and nine contributing resources located within the district. The Randolph Field NHLD is shown on **Attachment 2**.

One archaeological study has been conducted at JBSA-Randolph. In 1991, the National Park Service Interagency Archeological Services, Denver, Colorado, surveyed areas of JBSA-Randolph considered to have a high potential for intact sites. No archaeological resources were identified by the study, and no further work was recommended. No archaeological sites have been identified at JBSA-Randolph. The Air Force is concurrently conducting tribal consultation with all interested tribal government parties to ensure the tribes are provided ability to comment on the undertaking and whether it may adversely affect any historic properties of religious and cultural significance to the interested tribes.

Nine of the MILCON and FSRM projects would have no potential to impact cultural resources as they occur outside of the Randolph Field NHLD and include buildings, structures, or sites that have been previously determined not eligible for NRHP listing or were constructed after 1990 and have not reached the threshold for NRHP evaluation. Further, some of these projects would not involve ground disturbance, building modifications or construction, or other activities with potential to affect cultural resources and were not included in the APE.

The remaining ten MILCON and FSRM projects have the potential to impact cultural resources because they are located within the Randolph Field NHLD and the district is a historic property. Of those ten projects, five would occur within interior of buildings located in the Randolph Field NHLD (with no impact to character-defining interior features) and would have no effect on contributing resources within the district or the NHLD itself. The remaining five projects would include exterior alteration to two NHLD-contributing hangars, repainting of the taxi lanes, and the construction of the GBTS and MTS facilities.

An adverse effect is one that changes elements or characteristics of a historic property that make the property eligible for listing in the NRHP. The exterior alterations to Hangars 6 and 72 would occur on secondary elevations and would not adversely impact character-defining features. The bay window proposed for the southeast corner of Hangar 6 would be located within a rear addition last remodeled in 1985 and would not remove any historic wall material. The balcony proposed for Hangar 6 would be located on top of the lean-to addition and would only be visible from the rear of the hangar. The door to access the balcony would also be located on the rear of the hangar within a non-character defining section of wall currently punctuated by steel vents. Hangar 72 would include the alteration of two exterior doors; however, alteration would occur within existing door framing. Exterior fencing would also be removed; however, it is not a character defining feature of the hangar. Thus, there would be no adverse effect to those two listed and contributing hangars. The taxi lanes, though partially located within the APE, do not contribute to the Randolph Field NHLD and their repainting would have no adverse effect on the NHLD.

The last two components include the MTS and GBTS facilities. Both facilities would require the removal of non-contributing and non-historic recreational facilities within the NHLD. Thus, neither component would directly impact any contributing resources within the NHLD. Though there would be no physical impact to any contributing buildings, structures, or contributing open areas, the MTS and GBTS facilities would be present within the setting of the NHLD and would be visible from NHLD-contributing facilities. Features located within the setting of the NHLD have been identified as contributing resources, specifically the airfield plan, which includes the (overall) original plan for the flying field, the road layout of almost 32 miles, the park-like areas and boulevards, and the placement of pivotal buildings.

Though the MTS and GBTS facilities would be visible within the setting of the NHLD, neither facility would require alteration to the overall facility plan; the non-historic recreation features to be removed were not part of original plan; the roadway layout would not change; the tree-lined boulevards or historic landscaped open spaces would not change; and the placement of pivotal buildings would remain. Thus, though the MTS and GBTS facilities would be visible within the setting of the NHLD, the overall effect to the setting is recommended as non-adverse as there would be no change to elements or characteristics of the historic property (i.e., the Randolph Field NHLD) that make it eligible for listing in the NRHP (i.e. contributing buildings or structures, the roadway network, contributing open spaces, or the tree-line streets).

Lastly, the proposed GBTS facility would include four 15-foot-tall antennae located on top of the building. The GBTS facility would be located with the Randolph Field NHLD and would be potentially visible from up to 0.25 miles (i.e., throughout the indirect APE). There are currently lamp posts and other antennae and vertical incursions within the immediate landscape of the proposed antennae location. The antennae would be placed on top of the newly constructed GBTS facility, arranged along the ridge, and would be uniform in height and evenly spaced, see image shown on **Attachment 3**. The antennae would be minimally visible within a small portion of the Randolph Field NHLD and would not diminish the District's integrity of setting.

The MILCON and FSRM projects would be largely located on previously disturbed land and unidentified archaeological or traditional resources are not expected. Should unidentified historic properties or human remains be encountered during construction, the Air Force would follow the procedures for inadvertent discoveries provided in the JBSA Integrated Cultural Resources Management Plan.

The Air Force has reviewed the Criteria of Adverse Effect and have determined that none apply to the activities that would be carried out in this undertaking. The undertaking avoids destruction of or adverse alterations to historic properties and any exterior alterations that would occur would meet the

Secretary of the Interior's Standards. Adverse effects were also avoided through the thoughtful placement of new construction in non-contributing areas of the Randolph Field NHL, areas of compromised integrity, or outside of the District boundary; limiting exterior building alterations; and limiting the overall footprint of the undertaking.

Pursuant to 36 CFR § 800.5(b), the Air Force has determined that there would be no adverse effect to historic properties by T-7A recapitalization at JBSA. Attached for your review are copies of relevant supporting documents supporting the Air Force's findings and determinations.

As the undertaking has the potential to impact a listed NHL, we are requesting your comment on the finding of *No Adverse Effect*. If we do not receive your comments within 30 days, we will assume you have no comment on the proposed undertaking as described.

Please contact me by phone at (210) 740-8340; by electronic correspondence at 502ces.ceia.culturalresources@us.af.mil; or by written correspondence at 802 CES/CEIEA, 1555 Gott Street, JBSA-Lackland TX 78236 if you have any questions.

Sincerely,

Dayna
Cramer

Digitally signed by
Dayna Cramer
Date: 2021.06.21
13:58:58 -05'00'

DAYNA CRAMER, USAF
Cultural Resources Manager
802 Civil Engineer Squadron

Attachments:

1. Project Component Details and Assessment of Effect
2. Area of Potential Effect – June 2021
3. Rendition of the Proposed GBTS Facility and Antennae – June 2021

Attachment 1: Project Component Details and Assessment of Effect

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
MILCON Projects				
Facility 388 (Non-Historic Tennis Court); Facility 389 (Non-Historic outbuilding); 390 (Historic Tennis Court, Demolished)	<p>Construct a 30,000-ft² high-bay aircraft MTS facility at the current location of Facilities 388, 389, 390, and 397. New construction would occur within the Randolph Field NHLD and on existing ball field and tennis court properties.</p> <p>All existing facilities are non-historic and ineligible, except for Facility 390, which was replaced with a skate park ca. 2004 and is no longer extant. All new construction would occur within an existing recreation area. A new ball field and tennis courts would be constructed on vacant land as a replacement and would not be located within the Randolph Field NHLD.</p>	<p>Facility 388 – Not historic (non-contributing to the Randolph Field NHLD)</p> <p>Facility 389 – Not historic (non-contributing to the Randolph Field NHLD)</p> <p>Facility 390 – Listed, contributing to Randolph Field NHLD; however, demolished ca. 2004 and now a skateboarding park.¹</p>	<p>ca. 1980</p> <p>ca. 1980</p> <p>ca. 1950 (demolished ca. 2004)</p>	<p>No adverse effect</p>
Facility 397 (Non-Historic Ball Field)	<p>Construct a 33,000 ft² facility to hold a GBTS facility. Construct a 10,125 ft² parking lot to support the MTS and GBTS facilities. Four antennae would be located on top of the GBTS facility and would extend up to a maximum height of 15 feet above the building.</p> <p>New construction on existing ball field and tennis court property within the Randolph Field NHLD. Existing facility is non-historic and ineligible. All new construction would occur within existing recreation area. The antennae may be visible for up to approximately 0.25 miles; however, trees and buildings in the immediate vicinity would obscure that view, especially towards the center of the base to the southwest.</p>	<p>Facility 397 – Not eligible (non-contributing to the Randolph Field NHLD)</p>	<p>ca. 1970</p>	<p>No adverse effect</p>

¹ Historic aerial photographs show this facility was demolished ca. 2004.

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Hush House Pad (Non-Historic)	<p>The proposed hush house pad would be constructed on the site of the existing hush house pad and would be a 24,611 ft² concrete pad. The hush house pad is not located within the Randolph Field NHLD. The existing hush house pad has not been previously recorded and is a concrete pad constructed ca. 1990.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect
Fuel Cell Facility	<p>Construct 35,138 ft² fuel cell facility and parking area west of Building 38 on currently vacant land not located within the Randolph Field NHLD. As the facility has not yet been constructed, and would be located on currently vacant land, it does not have a facility number.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	N/A (not yet constructed)	N/A – Vacant	No effect
T-7A Shelters	<p>Construct 65 shelters for T-7A aircraft to replace existing, non-historic shelters. Structures are not located within the Randolph Field NHLD.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Not historic (not located within the Randolph Field NHLD)	ca. 2004	No effect
Building 38	<p>Building 38 would be modified by adding two more rooms (5,000 ft²) to the southwest side. Building 38 is not located within the Randolph Field NHLD.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
FSRM Projects				
Hangar 63	<p>Interior of first floor to be modified. No alteration to exterior of building and no character-defining features impacted. Building is located within the Randolph Field NHLD.</p> <p>Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Listed, contributing to the NHLD	1931	No effect
T-1 shelters rows 16 to 20	<p>Relocate five existing rows of T-1 shelters (rows 16 to 20) from the East Ramp to South Ramp. The T-1 shelters are currently not within the Randolph Field NHLD and would remain out of the district upon being moved. No character-defining features of the NHLD have the potential to be impacted.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Not historic (existing shelters) (not located within the Randolph Field NHLD)	ca. 2004	No effect
Hangar 13	<p>Interior of hangar to be modified for training and communication equipment. No character-defining features impacted. Building is located within the Randolph Field NHLD.</p> <p>Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Listed, contributing to the NHLD	1931	No effect
Building 220	<p>Public Affairs would move from Hangar 6 to Building 220. Interior modifications to use as office space; installation of utilities including electrical service and computer and phone lines. No character-defining features impacted. Building is located within the Randolph Field NHLD.</p> <p>Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.</p>	Listed, contributing to the NHLD	1930	No effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Hangar 72	Exterior modifications include the removal of a blocked door and install two lockable full-length glass doors. Security Forces fencing and concertina razor wire would be removed. Interior modification includes the demolition of the Flight Service Center office complex and gun vault. Building is located within the Randolph Field NHLD.	Listed, contributing to the NHLD	1931	No adverse effect
Hangar 6	Interior modifications to modernize equipment. Two exterior alterations on rear, secondary elevation. Both alterations would occur within extensively altered rear lean-to addition (NPS 2001). One small bump-out would be added to lean-to addition on southeast corner of building that would include a bay window for the Ops Desk to observe flight take-off on runway side. Alteration to non-historic wall material. In addition, a balcony would be added on top of the lean-to addition on the rear elevation and would require two exit doors to be added within the second floor of the rear to access the balcony. No character-defining features would be impacted. Building is located within the Randolph Field NHLD.	Listed, contributing to the NHLD	1931	No adverse effect
A1 and A6 Hammerhead Taxi Lanes	<p>Repaint A1 and A6 hammerhead taxi-lane markings and restripe for T-7A aircraft. Taxi lanes are not significant setting features and have been modernized and re-stripped on many occasions over time.</p> <p>A portion of the existing taxi lanes proposed for marking and restriping are located within the Randolph Field NHLD; however, no character-defining features of the NHLD have the potential to be impacted.</p>	Not eligible (non-contributing to the Randolph Field NHLD)	ca. 1930	No adverse effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Building 2, Buildings 878, and Building 891	Move CE Plumbers and HVAC personnel and equipment from Building 2 to Buildings 878 and 891.	Building 2 – Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect
	Buildings 2, 878, and 891 are not located within the Randolph Field NHLD.	Building 878 – Not historic (not located within the Randolph Field NHLD)	ca. 1975	
	Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.	Building 891 – Not eligible (not located within the Randolph Field NHLD)	ca. 1960	
Hangar 12	Interior alteration to hanger for 560 FTS expansion to install new operational equipment. No character-defining features impacted. No exterior alteration. Building is located within the Randolph Field NHLD. Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.	Listed, contributing to the NHLD	1931	No effect
Building 2	Alteration to relocate J85 engine shop. Building 2 is not located within the Randolph Field NHLD. Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.	Not historic (not located within the Randolph Field NHLD)	ca. 1990	No effect
Hangar 5	Reconfigure interior of hangar for use as a repair facility. Remove interior engine shop mechanical equipment. No character-defining features impacted. No exterior alteration. Building is located within the Randolph Field NHLD. Interior modifications to non-public portions of historic buildings are covered by the JBSA Programmatic Agreement as an exempt activity.	Listed, contributing to the NHLD	1931	No effect

Attachment 1

Building Name/ Number	Project Component	NRHP Status	Date constructed	Assessment of Effect
Ammunition Storage Area	<p>A new 1,855 ft² munitions storage building would be added to the JBSA-Randolph ammunition storage area. The proposed facility would not be located within the Randolph Field NHL. New building on vacant land.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	N/A; JBSA-Randolph ammunition storage area is not historic	ca. 2004	No effect
Trim Pad/Compass Rose	<p>Utilize the existing Trim Pad to install an anchor and relocate the Compass Rose. Located on the airfield and not within the Randolph Field NHL.</p> <p>Work outside the district that is not adjacent to historic properties is covered by the JBSA Programmatic Agreement as an exempt activity.</p>	N/A; trim pad is part of the parking ramp and compass rose is aeronautical equipment	Unknown	No effect

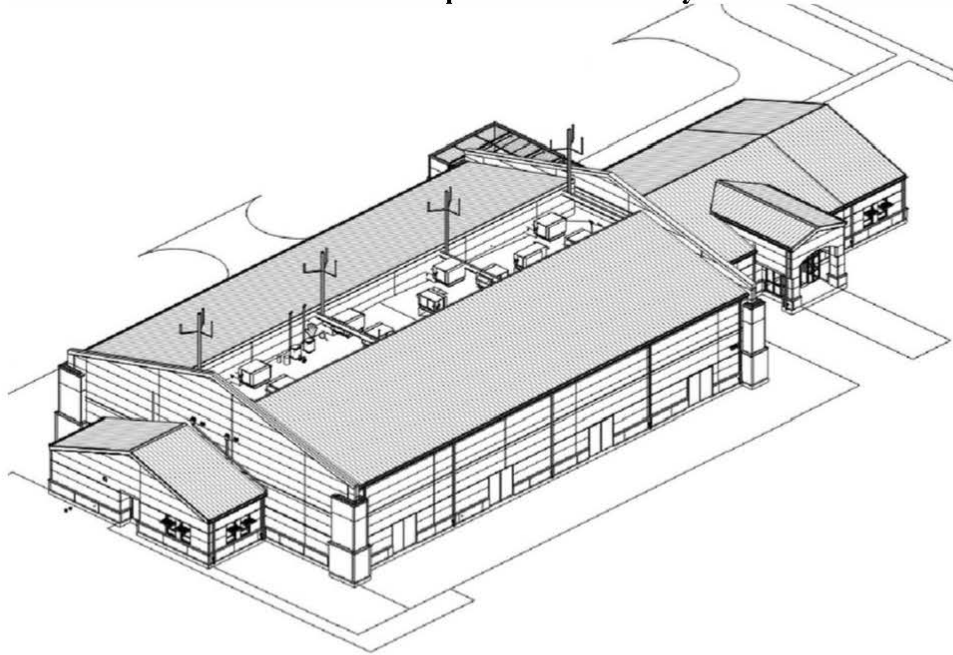
Key: N/A = not applicable, ca. = circa (approximately).

Attachment 2: Area of Potential Effect



Attachment 2

Attachment 3: Rendition of the Proposed GBTS Facility and Antennae



Note: Four 15-foot-tall antennae along roof ridge.

Attachment 3

Second letter to the National Park Service

Note: The National Park Service did not reply to the initial letter. The below correspondence was sent in conjunction with the first reply to the Texas State Historical Preservation Officer. The attached document referenced in the letter is found on pages F-81 to F-88.

From: CRAMER, DAYNA A GS-13 USAF AETC 802 CES/CEIEA (Environmental Conservation) <dayna.cramer@us.af.mil>
Sent: Wednesday, October 13, 2021 4:02 PM
To: justin_henderson@nps.gov; Olson, John P <john_p_olson@nps.gov>; astrid_liverman@nps.gov <astrid_liverman@nps.gov>
Cc: Lydia Woods-Boone <Lydia.Woods@thc.texas.gov>; SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil>; ALANIZ, OSMAR H GS-12 USAF AETC 802 CES/CEIEA <osmar.alaniz.3@us.af.mil>; WHITE, ALAN D GS-12 USAF AETC 802 CES/CEIE <alan.white@us.af.mil>
Subject: Supplemental Information for T-7A Recapitalization at Randolph

CAUTION: External Email – This email originated from outside the THC email system. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Justin/John/Astrid,

The attached document has been submitted to the Texas SHPO via their online system with eTrac number 202201476.

We invite your office to review and provide comments on this proposed undertaking.

Please respond that you have received this email.

We look forward to hearing from you.

Thank you.

Dayna Cramer, GS-13, DAF
JBSA Environmental Conservation Chief
802 CES/CEIEA
Main office: Camp Bullis B6201
Cell: 210-740-8340
dayna.cramer@us.af.mil < Caution-mailto:dayna.cramer@us.af.mil > < Caution-Caution-mailto:dayna.cramer@us.af.mil >
dayna.a.cramer.civ@army.mil < Caution-mailto:dayna.a.cramer.civ@army.mil > < Caution-Caution-mailto:dayna.a.cramer.civ@army.mil >

CLASSIFICATION: UNCLASSIFIED

Response from the National Park Service

From: Olson, John P <john_p_olson@nps.gov>

Sent: Tuesday, October 19, 2021 2:36 PM

To: Alex Toprac <Alex.Toprac@thc.texas.gov>; CRAMER, DAYNA A GS-13 USAF AETC 802 CES/CEIEA (Environmental Conservation) <dayna.cramer@us.af.mil>

Cc: SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil>; ALANIZ, OSMAR H GS-12 USAF AETC 802 CES/CEIEA <osmar.alaniz.3@us.af.mil>; WHITE, ALAN D GS-12 USAF AETC 802 CES/CEIE <alan.white@us.af.mil>; Henderson, Justin K <Justin_Henderson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Lydia Woods-Boone <lydia.woods@thc.texas.gov>

Subject: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph

Dayna,

We agree with the comments sent to you earlier today by Alex Toprac of the THC regarding our ability to render a decision on a *no adverse effect* determination based on the information provided. We will also need photographs of existing conditions and the planned product specifications for door replacements at Hangar 72 before we could make such a determination. Photographs of the existing conditions for the interior changes to both Hangar 72 and Hangar 6, depending on how they are categorized by the existing PA, would also be helpful for these purposes. At this point we have not seen photographs of either of these elements in any of the draft EIS information provided or in the attached document sent to our office via email on 10/13/2021. Once we have the requested information, we should be able to review and respond in a timely fashion to the requested changes on contributing buildings within the NHL designated district at Randolph Field.

If you would like any clarifications from our office, please feel free to contact us at your convenience.

John

John P. Olson
Historical Architect
Heritage Partnerships Program
National Park Service
Serving DOI Regions 6, 7, & 8
12795 W. Alameda Parkway
Lakewood, CO 80228
303-905-6165

Note: The second, third, fourth, fifth, and sixth replies to the Texas State Historical Preservation Officer were also sent to the National Park Service.

Response from the National Park Service for the sixth reply to the Texas State Historical Preservation Officer

From: Henderson, Justin K <Justin_Henderson@nps.gov>
Sent: Tuesday, December 7, 2021 10:31 AM
To: CULTURAL RESOURCES <502CES.CEIEA.CULTURALRESOURCES@us.af.mil>; Alex Toprac <Alex.Toprac@thc.texas.gov>
Cc: Olson, John P <john_p_olson@nps.gov>; Liverman, Astrid B <astrid_liverman@nps.gov>; Lydia Woods-Boone <lydia.woods@thc.texas.gov>; SWICK, NOLAN T GS-14 USAF AFMC AFCEC/CZN <nolan.swick@us.af.mil>; ALANIZ, OSMAR H GS-12 USAF AETC 802 CES/CEIEA <osmar.alaniz.3@us.af.mil>; Katharine R. Kerr <kkerr@achp.gov>
Subject: Re: [Non-DoD Source] RE: [EXTERNAL] RE: Supplemental Information for T-7A Recapitalization at Randolph (UNCLASSIFIED)

Greetings -

Thank you for your letter and architectural drawing attachment sent to us on November 9 and 18, regarding the United States Air Force as property owner/manager fulfilling the role of lead agency on the following project: T-7A recapitalization. This notice was done in accordance with Section 106 of the National Historic Preservation Act (NHPA), codified and published in 36 CFR Part 800, for the review of a Joint Base San Antonio (JBSA) undertaking with the potential to affect historic properties. Please see the attached National Park Service regional National Historic Landmark Program response and comments. (attached)

If you you have any follow up questions or concerns please let us know. We look forward to continuing to work in consultation on the stewardship of National Historic Landmarks at Joint Base San Antonio.

All the best -



United States Department of the Interior

NATIONAL PARK SERVICE
INTERIOR REGIONS 6, 7 & 8
12795 W. Alameda Parkway
Lakewood, CO 80228



H34 (IMDE-HPP)

Dayna Cramer
Chief, Environmental Conservation
802 CES/CEIEA
Department of the Air Force
Joint Base San Antonio
1555 Gott St
JBSA Lackland TX 78236-5645

RE: T-7A recapitalization and proposal for construction of new Ground Based Training System (GBTS) and Maintenance Training System (MTS) facilities within Randolph Field Historic District NHL

Dear Ms. Cramer:

Thank you for your letter and architectural drawing attachment sent to us on November 18th and 9th, respectively, regarding the United States Air Force as property owner/manager fulfilling the role of lead agency on the following project: T-7A recapitalization. This notice was done in accordance with Section 106 of the National Historic Preservation Act (NHPA), codified and published in 36 CFR Part 800, for the review of a Joint Base San Antonio (JBSA) undertaking with the potential to affect historic properties. JBSA includes the Fort Sam Houston National Historic Landmark (NHL), so designated by the Secretary of the Interior on May 15, 1975, as well as Randolph Field Historic District National Historic Landmark, designated on August 7, 2001. The direct and indirect APE contains historic properties and are located within a National Historic Landmark District (NHLD).

National Historic Landmarks (NHLs) are historic places that "possess exceptional value in commemorating or illustrating the history of the United States." To the maximum extent possible, efforts must be made throughout the proposed project to minimize harm to NHLs in accordance with Section 106 of the National Historic Preservation Act (NHPA). Section 110(f) of the NHPA requires that "prior to the approval of any Federal undertaking, which may directly and adversely affect any National Historic Landmark, the head of the responsible Federal agency shall, to the maximum extent possible, undertake such planning and actions as may be necessary to minimize harm to such landmark, and shall afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on the undertaking." Moreover, as stated in 36 CFR Part 800.10(c), federal agencies are required to notify the Secretary of the Interior (delegated to the National Park Service) an undertaking that may involve an NHL and

invite the Secretary to participate in the consultation where there may be an adverse effect. Direct and adverse effects are not limited to physical impacts and may include visual, auditory, and atmospheric effects.

Upon review of the materials, our office has the following comments:

- The architectural drawing set received is a 100% Design Development set. Since this is the first our office has received notice about the proposed new buildings within the Randolph Field Historic District NHL, we would ask that in future notices of new construction which trigger Section 106 consultation we receive notification of design intent prior to this late stage of design development. It is exceedingly difficult to conduct mutually beneficial consultation regarding how a new proposed design will affect historic properties as is required by the Section 106 and Section 110 process when design has progressed well beyond mass/scale and material choices without prior notification.
- In addition, while the Design Development set sent to our office on November 9th for the GBTS and MTS facilities is quite large at 621 pages, there are both concerns with crucial missing elements from this set necessary for our office to provide informed comments and superfluous information which slows our examination of pertinent material necessary for comments. For example, when proposed new construction within a NHLD is submitted, our office generally doesn't need to see full details of interior floor plans, millwork, mechanical plans, fire protection, or plumbing since these factors will not likely have an effect on surrounding historic properties either directly or indirectly. It substantially lengthens our process of review since we need to sift through a majority of information submitted which is not needed by our office. Conversely, the design set was missing crucial information regarding context in the NHLD which can be provided in the future via photographs and a site plan which includes nearby contributors. (A site location map was provided on page 331 of the drawing set, but did not indicate neighboring building heights, topography, etc.) A specification sheet which shows photographs of proposed materials and colors for new construction would also be helpful to the process.
- Our office acknowledges mission need for the purposes outlined in your submittal letter and agrees generally with the proposed location within the district since it is both adjacent to the squadron operations and maintenance functions for the T-7A and currently does not contain primary historic fabric. However, we encourage early consultation, future consideration, and proactive planning for conversion of existing contributing historic buildings in the district for similar uses if said conversion would better utilize the historic buildings as fully efficient essential elements for the base.
- The two proposed buildings are large at 45' and 43.5' high at the ridge, respectively, and both are over 250' long. Because of the size of the buildings and the proposed extensive use of exterior metal panels, metal roofing, and precast concrete on both buildings, our office requests further information about the color and material appearance for each of these important components. In particular, it is listed in the Exterior Finish Schedule that the exterior metal panel material is to be "Cambridge White." Please provide a sample color swatch to our office to confirm for comment. It is noted that most nearby contextual buildings are a yellow or cream color stucco so it is unknown at this time how "Cambridge White" will compliment or contrast its historic neighbors.

- Should any artifacts or other evidence of prehistoric or historic disturbance be found during the proposed new construction, please cease work and contact the State Historic Preservation Officer prior to completing the project. If human remains or funerary objects are discovered at any time, then the JBSA shall comply with the Native American Graves Protection and Repatriation Act (NAGPRA).

We appreciate your interest in preserving our nation's historic resources and look forward to further partnership and consultation with your office. We would like to continue to offer technical assistance and support regarding the details of this project as the project proceeds and would welcome the opportunity to visit the JBSA installation sometime early in the next year to discuss both of our offices' needs in future Section 106 consultations. Please feel free to forward us any dates in the first few months after the first of the year which would be convenient for your staff for a site visit. It may be helpful for us to all coordinate with the Texas Historical Commission on a joint visit. If you have any questions, or if we can be of assistance, please contact me at (303) 969-2540 and Justin.Henderson@nps.gov.

Sincerely,

A handwritten signature in black ink that reads "Justin Henderson". The signature is written in a cursive style with a long horizontal flourish at the end.

Justin Henderson
Program Manager
Heritage Partnerships Program
National Park Service

Note: The Air Force responded to this correspondence through its seventh reply to the Texas State Historical Preservation Officer.

First Letter to the Absentee-Shawnee Tribe of Indians of Oklahoma



DEPARTMENT OF THE AIR FORCE
12TH FLYING TRAINING WING
JOINT BASE SAN ANTONIO – RANDOLPH TEXAS

22 June 2021

Mr. Michael D. Waldrop
JBSA Tribal Liaison
AETC 502 ABW
502 MSG/CD (BLDG 122)
JBSA-Fort Sam Houston TX 78234

Mr. John Johnson
Governor
Absentee-Shawnee Tribe of Indians of Oklahoma
2025 South Gordon Cooper Drive
Shawnee, OK 74801

Dear Governor Johnson:

The United States Air Force (USAF) is preparing an Environmental Impact Statement (EIS) under the National Environmental Policy Act to evaluate potential environmental impacts associated with T-7A recapitalization at Joint Base San Antonio (JBSA), Texas. Per Section 106 of the National Historic Preservation Act (NHPA) (54 U.S.C. § 306108) and its implementing regulations at 36 CFR Part 800, the USAF is accounting for various environmental concerns and engaging early with tribal governments as it formulates the undertaking.

As part of the proposed undertaking, T-7A recapitalization would entail the phased introduction of T-7A aircraft and phased reduction of the T-38C aircraft currently operating from JBSA-Randolph; new intensities of flight operations at JBSA-Randolph, JBSA-Lackland, and Seguin Auxiliary Airfield including nighttime operations at JBSA-Randolph and JBSA-Lackland; and the introduction of 300 new personnel at JBSA-Randolph. T-7A operations would occur at a relatively high altitude within the same designated military airspace boundaries currently used for T-38C operations. No changes to these boundaries would be necessary to support the proposed operations of the T-7A (see **Attachment 1**). Additionally, construction for six military construction (MILCON) projects and 13 facilities sustainment, restoration, and modernization (FSRM) projects would occur at JBSA-Randolph to provide modern facilities and infrastructure to support the T-7A aircraft's maintenance, training, and operational requirements. The MILCON and FSRM projects include new building construction, renovation of several existing buildings and hangars, repainting taxi lines, and relocation of displaced athletic facilities. **Attachment 2** shows the locations of the MILCON and FSRM projects. No ground disturbance would occur at JBSA-Lackland and Seguin Auxiliary Airfield.

In accordance with the NHPA, the USAF would like to initiate government-to-government consultation regarding the T-7A recapitalization at JBSA. The USAF requests your input in identifying any issues or areas of concern you feel should be addressed in the environmental analysis. Additionally, please let us know if you believe this undertaking might adversely affect any historic properties of religious and cultural significance to the Absentee-Shawnee Tribe of Indians of Oklahoma.

If you have any questions, please contact Mr. Nolan Swick via email at nolan.swick@us.af.mil or mail at AFCEC/CZN, Attn: T-7A Recapitalization EIS, 2261 Hughes Ave, Suite 155, JBSA-Lackland, TX 78236-9853. Thank you in advance for your assistance in this effort.

Sincerely,

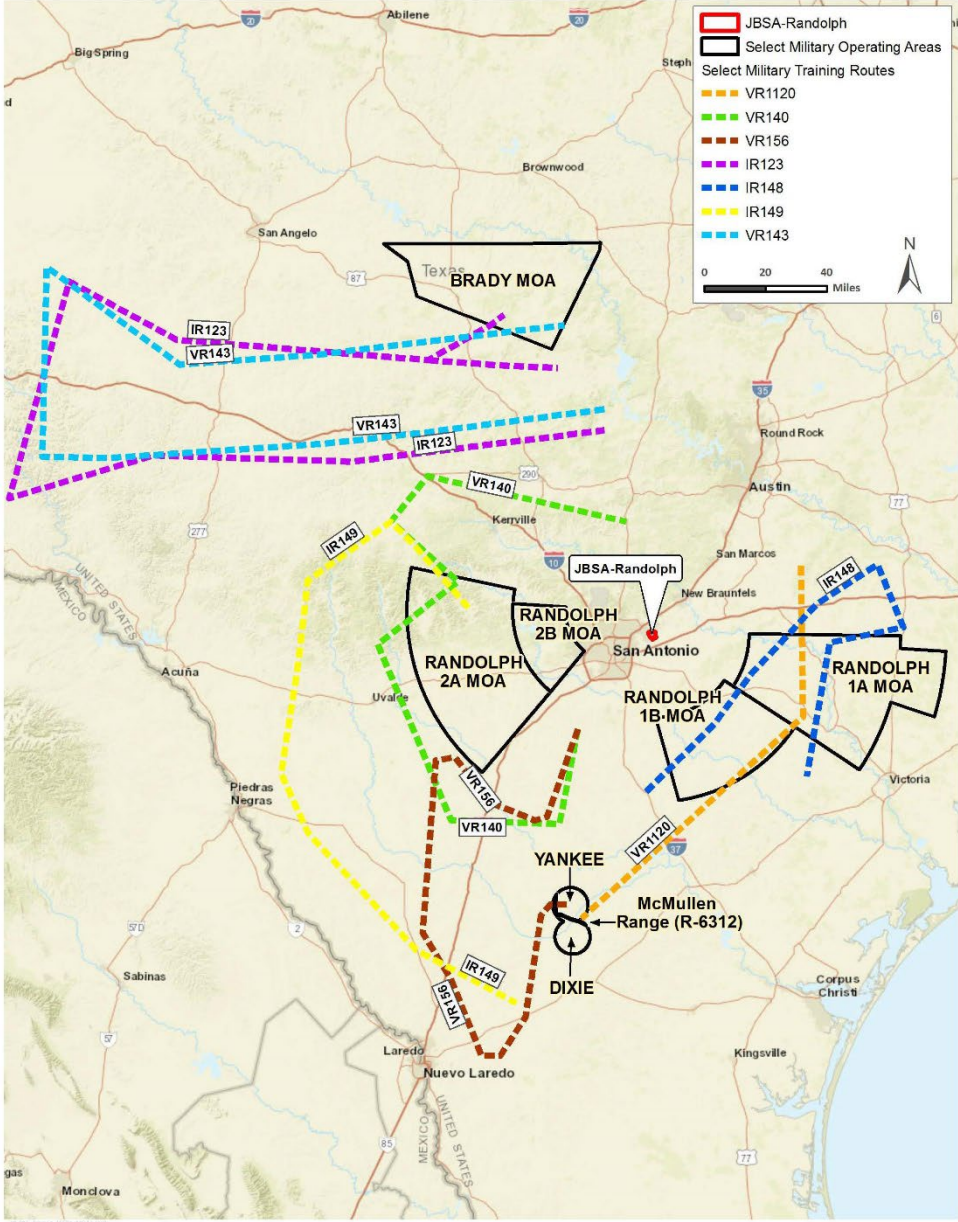


MICHAEL D. WALDROP

Attachment:

1. Airspace Map – June 2021
2. MILCON and FSRM Project Map – June 2021

Attachment 1: Airspace Map



Data Sources: Basemap (ESRI Streetmap), FAA and DISDI.

Attachment 2: MILCON and FSRM Project Map



*Attachments 1 and 2 are identical for all Native American letters and are not repeated in this appendix.

Second Letter to the Absentee-Shawnee Tribe of Indians of Oklahoma



DEPARTMENT OF THE AIR FORCE
AIR FORCE CIVIL ENGINEER CENTER
JOINT BASE SAN ANTONIO LACKLAND TEXAS

08 October 2021

MEMORANDUM FOR INTERESTED INDIVIDUALS, ORGANIZATIONS, PUBLIC GROUPS,
GOVERNMENT AGENCIES AND OTHERS

FROM: AFCEC/CZN
2261 Hughes Ave, Suite 155
JBSA Lackland, TX 78236-9853

We are pleased to provide you with notice of availability of the Draft Environmental Impact Statement (EIS) for the T-7A Recapitalization at Joint Base San Antonio. This document is provided in accordance with the National Environmental Policy Act (NEPA) and is available online at www.jbsa.T-7ANEPAdocuments.com.

Notification of the availability of the Draft EIS will appear in the Federal Register on October 15, 2021. The Draft EIS analyzes alternative actions for the Department of the Air Force's (DAF) proposal to replace T-38C Talon aircraft with T-7A Red Hawk aircraft, construct supporting infrastructure, provide appropriate manpower, and conduct T-7A flight operations in support of the pilot training mission.

The DAF will hold a virtual public hearing on the Draft EIS on November 16, 2021, from 5:30-8:00 p.m. Central Time, via internet/phone. The purpose of the hearing is to receive input on the proposed action and alternatives and the Draft EIS analysis. The hearing will also be announced through local media. Instructions for participating in the virtual public hearing are provided on the project website, www.jbsa.T-7ANEPAdocuments.com. A link to the on-line virtual public hearing will be provided on the project website allowing interested parties to electronically participate in the public hearing, and a phone number will be provided for those without internet access. A Spanish-speaking interpreter will be available at the virtual public hearing to assist with translation of verbal comments. *Un intérprete de español está disponible para ayudar con la traducción de los comentarios al inglés.*

Public, agency, and stakeholder substantive comments provided at the hearing and through written comments received via postal mail and the project website will be considered in the preparation of the Final EIS. To ensure we have sufficient time to consider your input in the Final EIS, please submit comments by November 29, 2021.

Additional information can be found on the project website listed above. Questions or comments can be submitted to the Air Force Civil Engineer Center (AFCEC) project point-of-contact Mr. Nolan Swick, AFCEC/CZN, Attn: JBSA T-7A Recapitalization EIS, Headquarters Air Education and Training Command Public Affairs, 100 H. East St, Ste 4, Randolph AFB, Texas 78150.

Sincerely,

SWICK.NOLAN
.T.1386410530

Digitally signed by
SWICK.NOLAN.T.1386410530
Date: 2021.10.06 11:52:51
-05'00'

Nolan Swick, DAFC
Project Manager
Air Force Civil Engineer Center, NEPA Division

*The second letter was identical for all tribes and is not repeated in this appendix.