



July 19, 2013

Paul F. Woodruff
Cultural Resources Manager, Operations Branch
Environmental Management Division
88 ABW/CEVO, 1450 Littrell Road
Wright-Patterson AFB, OH 45433-5209

Re: Impact Assessment at Archaeological Site 33-GR-31
WPAFB, Greene County, Ohio

Dear Mr. Woodruff,

This is in response to correspondence from your office dated April 29, 2013 (received May 1) regarding the above referenced project. The comments of the Ohio Historic Preservation Office (OHPO) are submitted in accordance with provisions of the National Historic Preservation Act of 1966, as amended (16 U.S.C. 470 [36 CFR 800]).

The correspondence transmits the impact analysis titled "Stabilization Study of the Wright-Patterson Air Force Base Mound (33-GR-31), Wright-Patterson Air Force Base, Greene County, Ohio" by Stevan C. Pullins, dated February 15, 2013. As discussed further below, we also favor selection of Option 2 as the basis for developing a preservation plan for the mound.

We are pleased to have the opportunity to participate in the consultation concerning the plans for stabilizing conditions at the Wright-Patterson Air Force Base Mound. The impact assessment is thorough and thoughtful. The study provides an objective and measured assessment of the conditions at the mound and presents these data in a way that helps the reader understand the extent of the impacts. The study presents evidence that the groundhog holes and burrows are beginning to undermine the mound with increasing negative effects. There are also plant species such as honeysuckle that are undesirable. The study also provides examples of preservation plans with standard practices that have been established at similar archaeological sites in other States.

Our highly subjective view is that visually the current conditions make it a little difficult to appreciate the significance of this historic property. In particular, honeysuckle and groundhog holes distract from overall viewing of the mound. At first glance some people might think that this is a brush pile. We've tried to imagine the mound without any trees and with a uniform covering of native grass. In the midst of a heavily developed base with buildings in every view of the mound, we wonder if the mound will seem to melt into the grassy lot. The presence of a few trees that are carefully managed and the use of a couple of different kinds of native ground cover will provide contrasts in size, shape, and color that will help people view the mound in perspective. Thus, we favor Option 2 for the basis of developing and carrying out a management plan.

OHIO HISTORICAL SOCIETY

Ohio Historic Preservation Office

800 East 17th Avenue, Columbus, Ohio 43211 ph: 614.298.2000 fx: 614.298.2037

www.ohiohistory.org

Mr. Paul F. Woodruff
July 19, 2013
Page 2

The assessment of conditions at the mound provides a sound basis for the development of a detailed plan to manage vegetation and also to measure the effectiveness of preservation measures. In particular, the study lays out standard practices with specific steps to trap and euthanize groundhogs, to fill groundhog holes, for cutting trees, for use of chemicals to treat tree stumps, and to prepare the ground surface for planting ground cover.

The use of a bare fence to keep unwanted animals out is not particularly attractive to us. However, perhaps as part of long range planning, it might be interesting to consider the design of an enclosure with seating, signage, and plantings that incorporate but conceal a fence that would keep most groundhog sized animals off of the mound. Creating a passive, park-like setting might be worthy of consideration. It would be interesting to hear from Tribes and other consulting parties about long range plans.

In our experience, it is helpful to incorporate standard practices with specific steps into site preservation plan and as part of the Integrated Cultural Resource Management Plan for the Base. Please keep the Ohio Historic Preservation Office informed during the development and implementation of the management / preservation plan.

Any questions concerning this matter should be addressed to David Snyder at (614) 298-2000, between the hours of 8 am. to 5 pm. Thank you for your cooperation.

Sincerely,



David Snyder, Ph.D., RPA, Archaeology Reviews Manager
Resource Protection and Review