

3.9 Cultural Resources

Environmental Impact Statement for Basing F-35A Lightning II Formal Training Unit at Kingsley Field Air National Guard Base, Klamath Falls, Oregon



August 2026

3.9 CULTURAL RESOURCES

3.9.1 Affected Environment

This document uses the terms ‘Pre-Contact’ and ‘Post-Contact’ instead of ‘Pre-Historic’ and ‘Historic’ to refer to the periods before and after European contact with Indigenous peoples. Cultural resources can be broadly defined as Pre-Contact and Post-Contact period sites and districts; structures; artifacts; features that display evidence of human activity; and landscapes and features that play a fundamental role in a specific community’s identity, beliefs, or value system.

Under 36 CFR § 800.16(d), the Area of Potential Effects (APE) means the geographic areas within which the undertaking may directly or indirectly cause alterations in the character or use of historic properties. For purposes of Section 106 consultation, the federal undertaking is the Proposed Action, consisting of the beddown of the F-35A Lightning II aircraft at Kingsley Field ANGB, associated construction, renovation, and demolition activities, and associated aircraft operations within the existing military training airspace. Consistent with this definition, the NGB defined the APE as the jurisdictional boundary of Kingsley Field ANGB, areas within the 65 dB DNL (or greater) noise contour, and lands beneath the existing military training airspace (from the surface to the top of each designation), including a 1-mile horizontal buffer. This APE provides the geographic boundaries used for identifying historic properties and evaluating potential effects. Consultations with State Historic Preservation Officers (SHPOs), Tribal Historic Preservation Officers (THPOs), and federally recognized Tribes for this undertaking are summarized in Section 3.9.2.2.

In addition to consultation conducted under section 106 of the National Historic Preservation Act (NHPA), the DAF recognizes Tribal sovereignty and conducts government-to-government consultation consistent with Executive Order 13175 and applicable Federal policy.

3.9.1.1 Installation

Archaeological Resources

Kingsley ANGB maintains an Integrated Cultural Resources Management Plan (ICRMP) to aid in management of cultural resources on the base in accordance with appropriate federal laws and other applicable DAF and ANG policies. The ICRMP is a planning and management tool that outlines base policies and procedures for the protection, management, and preservation of cultural resources including historic properties.

A comprehensive cultural resources survey of the base was conducted between 2000 and 2002. This survey resulted in the identification of one archaeological site (35KL2893), a Post-Contact artifact scatter dating to the late 1930s or early 1940s. Site 35KL2893 is located outside the APE for the current undertaking and was recommended not eligible for listing in the National Register of Historic Places (NRHP). A cultural resources inventory conducted in 2011 at locations outside of the current installation boundary identified one Post-Contact-period archaeological site (35KL2909) and one Post-Contact-period isolate (IF-1). Site 35KL2909 is also located outside the APE and was recommended not eligible for listing in the NRHP. The location of IF-1 could not be determined from available documentation; however, as an isolated find, IF-1 was determined to have no archaeological value.

1 Because the Proposed Action includes substantial ground disturbance associated with
2 construction, building renovation, modification, and demolition within Kingsley Field ANGB,
3 NGB conducted an archaeological survey in 2025 in coordination and consultation with the
4 Klamath Tribes and the Oregon SHPO. The survey included 122 shovel test pits (STPs) within
5 proposed construction areas and a 15-meter buffer where non-impervious surfaces could be
6 affected. One STP contained a non-diagnostic metal artifact within disturbed soil associated with
7 the former runway. The deteriorating runway, recorded as Kingsley-SITE-001, was evaluated and
8 determined by NGB to be not eligible for the NRHP due to a lack of integrity and distinguishing
9 characteristics necessary for eligibility (Stantec GS Inc. 2025). The Oregon SHPO concurred with
10 the determination in a letter dated May 19, 2026. No Tribal concerns regarding the site or survey
11 results were received.

12 The 2025 archaeological survey provides the basis for evaluating effects from Proposed Action
13 construction. The Existing Conditions (2023)¹ noise environment is used separately to characterize
14 the established acoustic setting for purposes of evaluating potential effects associated with
15 Proposed Action aircraft operations.

16 Architectural Resources

17 In 2002, NGB contracted a cultural resources survey for Kingsley Field ANGB to evaluate 59 built
18 resources constructed between 1941 and 1991. At the time of the survey, five resources were
19 identified as being 50 years of age or older. The remaining 54 resources had not yet reached the
20 historic age threshold but were evaluated under Criteria Consideration G for their association with
21 the Cold War Era. Of the 54 resources evaluated under Criteria Consideration G, 11 were
22 munitions storage facilities and 2 were unaccompanied personnel housing dormitories. These
23 resource types are covered by the Advisory Council on Historic Preservation's Program Comment
24 for World War II and Cold War Era (1939–1974) Ammunition Storage Facilities and Program
25 Comment for Cold War Era Unaccompanied Personnel Housing (1946–1974). The Program
26 Comments provide a programmatic means of satisfying Section 106 requirements for specified
27 management actions affecting covered facilities through historic context studies and representative
28 documentation, rather than requiring separate case-by-case Section 106 review. Based on the
29 results of the 2002 survey, NGB determined Building 400, an Aircraft Alert Hangar built in 1956,
30 to be eligible for listing in the NRHP. At that time, no historic district for Kingsley Field ANGB
31 was identified.

32 In 2025, NGB conducted an intensive-level architectural survey to evaluate the built environment
33 for eligibility under the criteria established in the NRHP. Based on the results of the survey, NGB
34 determined that Building 219 (maintenance hangar), Building 325 (aircraft shelter), and Building
35 400 (alert hangar) are each individually eligible for the NRHP under Criteria A and C.
36 Additionally, NGB determined that Buildings 219, 325, and 400 constitute an NRHP eligible
37 historic district identified as the Kingsley Field Alert Hangar Historic District.

¹ Existing Conditions (2023) is the modeled 2023 aircraft operations and noise environment used as the analytical baseline in the Final Noise Study (DAF 2026). It represents the most recent operational noise environment used for comparison rather than the temporarily reduced noise environment following cessation of regular 173 FW F-15C/D operations.

Traditional Cultural Places and Sacred Sites

No known traditional cultural places or Native American sacred sites have been identified within the installation portion of the APE. The Confederated Tribes of the Grand Ronde Community of Oregon, Confederated Tribes of Warm Springs Reservation of Oregon, Cow Creek Band of Umpqua Tribe of Indians, Klamath Tribes, and Modoc Nation have been identified as federally recognized tribes with historical, cultural, or linguistic affiliations to LMT/Kingsley Field ANGB.

3.9.1.2 Off-Installation

One historic property, Summers School, is located within the DNL 70 to 75 dB noise contour surrounding the airfield (NPS 2024c, 2024d; Oregon SHPO 2024a, 2024b). The Existing Conditions (2023) noise environment is used to characterize the acoustic setting of this property, providing a conservative basis for evaluating potential effects.

3.9.1.3 Military Training Airspace

Table 3.9-1 identifies the NRHP-listed properties and State Historic Landmarks identified beneath the military training airspace used by the 173 FW (NPS 2024c, 2024d). These properties include archaeological sites, historic districts, buildings, structures, objects, trails, and other resource types in California, Idaho, Nevada, and Oregon.

The 2017 *Environmental Impact Statement for Proposed Establishment and Modification of Oregon Military Training Airspace* determined that no traditional cultural properties or resources were known to occur within or be affected by the Oregon military training airspace action (NGB 2017). No traditional cultural places or Native American sacred sites have been identified within the military training airspace portion of the APE through consultation conducted for the current undertaking.

Table 3.9-1 NRHP Historic Properties and State Historic Land Under the Military Training Airspace

<i>Military Training Airspace</i>	<i>Number of Listed NRHP Properties Under Military Training Airspace</i>	<i>Number of State Historic Landmarks Under Military Training Airspace</i>
California		
Dolphin South MOA	8	7
Goose North MOA	3 ¹	1
Goose South MOA	13	4
Idaho		
Jarbridge North MOA	1	0
Owyhee North MOA	1	0
Paradise North MOA	1	0
Nevada		
Hart B MOA	1 ²	0
Hart D MOA	0	0
Hart E MOA	1 ²	0
Hart F MOA	1 ²	1
Jarbridge South MOA	1	2
Owyhee South MOA	0	0
Paradise South MOA	1	1
Oregon		
Dolphin North MOA	129	6

<i>Military Training Airspace</i>	<i>Number of Listed NRHP Properties Under Military Training Airspace</i>	<i>Number of State Historic Landmarks Under Military Training Airspace</i>
Dolphin South MOA	29	0
Juniper A & Juniper Low	0	0
Juniper B & Juniper Low	0	0
Juniper C & Juniper East Low	0	0
Juniper D & East Low MOA	3	0
Hart A MOA	0	0
Hart B MOA	3	0
Hart D MOA	0	0
Varmit ATCAA	2	0

Notes: ¹Two of these sites are archaeological sites and the exact location is not available to the public; therefore, they may or may not be located under the military training airspace.

²The NRHP listed historic property is the same site (Applegate-Lassen Trail) which is located within the three MOAs.

Legend: MOA = Military Operations Area; NRHP = National Register of Historic Places.

Sources: NPS 2024c, 2024d; NoeHill 2024.

The historic properties in California include 15 archaeological sites and a range of other resource types, including a shipwreck; a light station and lighthouse; the Gasquet Ranger Station Historic District; a schoolhouse; a Catholic church; a carpenter and paint shop associated with the Tule Lake Segregation Center; and Nevada–California–Oregon Railway resources (a depot and a general office building) (NPS 2024c, 2024d). Twelve California State Historic Landmarks occur beneath the military training airspace: Applegate–Lassen Trail, Battery Point Lighthouse, Battle of Land’s Ranch (1872), Brother Jonathan Cemetery, Camp Lincoln, Evans and Baily Fight, Fort Ter-Wer Site, Fremont’s Camp, Indian Village Site, Infernal Caverns Battleground, Pioneer Stage Road to Oregon, and S.S. Emidio (NoeHill 2024).

In Idaho, the three historic properties include the Wickahoney Post Office and Stage Station, Camp Three Forks, and the Camas and Pole Creeks Archaeological District (NPS 2024c, 2024d). Idaho does not have a State Register of Historic Places.

The three historic properties located in Nevada include Gold Creek Ranger Station, Silver State 13 Flour Mill, and the Applegate-Lassen Trail. The Applegate-Lassen Trail is located beneath three 14 military training airspace units (Hart B MOA, Hart E MOA, and Hart F MOA) (NPS 2024c, 2024d). Four Nevada State Historic Landmarks are located beneath the military training airspace. 16 These historic landmarks are titled: Camp McGarry, Town of Jarbidge, Jarbidge Community Hall, 17 and Fort McDermitt (NoeHill 2024).

The 166 historic properties in Oregon include 68 archaeological sites, 9 mines, 4 lighthouses, 17 houses, 6 ranger or coast guard stations, 5 hotels, 4 cemetery’s, 13 bridges, 6 ditches, 3 ranch/ranch complexes, 2 theatre’s, 2 historic districts, 2 banks, 1 library, 2 city hall’s, 2 churches, 1 cabin, 8 general buildings, the Siskiyou Smokejumper Base, a life boat station, a river light, an Elks Temple, a printing plant, Tribal Hall of the Confederated Tribes of Coos, Lower Umpqua and Siuslaw Indians, a shipwreck, Cape Perpetua shelter and parapet, the Allen Gulch townsite, the Wheeler Ridge Japanese Bombing Site, and the Stone Bridge and the Oregon Central Military Wagon Road (NPS 2024c, 2024d). Six Oregon State Historic Landmarks are located beneath the Dolphin North MOA. These historic landmarks are titled: Empire City, Spruce Soldiers, Cape San Sebastian, Conflict of Pistol River, Gold Beach, and the location of the Japanese Attack on Oregon (NoeHill 2024).

3.9.2 Environmental Consequences

Effects analysis for cultural resources focuses on assessing whether the Proposed Action or No Action Alternative have the potential to affect cultural resources that are eligible for listing in the NRHP (known as historic properties) including traditional cultural places or historic properties of religious and cultural significance to an Indian tribe. Under Section 106 of the NHPA, the lead agency is responsible for determining whether any historic properties are located in the APE; assessing whether the proposed undertaking would adversely affect the resources and notifying the SHPO or Tribal Historic Preservation Officer of potential adverse effects.

An adverse effect is any action that may directly or indirectly change the characteristics that make the historic property eligible for listing in the NRHP. If an adverse effect is identified, the federal agency consults with the SHPO/Tribal Historic Preservation Officer, federally recognized tribes, and in some case, the Advisory Council on Historic Preservation to develop measures to avoid, minimize, or mitigate the adverse effects of the undertaking.

Analysis of potential adverse effects on historic properties, including properties of traditional religious and cultural importance to an Indian tribe, is based on the following considerations: (1) physically altering, damaging, or destroying all or part of a resource; (2) altering characteristics of the surrounding environment that contribute to resource significance; (3) introducing visual, audible, or atmospheric elements that are out of character with the property or alter its setting; or (4) neglecting the resource to the extent that it deteriorates or is destroyed. The potential to directly disturb historic properties can be assessed by identifying the type and location of the Proposed Action. Effects that are farther removed from the immediate project area, including visual, audible (noise), or atmospheric changes due to project implementation may be harder to quantify.

Construction, renovation, and demolition activities associated with the Proposed Action have the potential to affect historic properties through both direct and indirect impacts. Ground-disturbing activities, including excavation, grading, trenching, and foundation work, may disturb or destroy previously identified or unidentified archaeological resources. Renovation and demolition of buildings, structures, or infrastructure may alter, damage, or remove character-defining features of historic properties, thereby diminishing their integrity and significance. In addition, construction activities may result in indirect effects, such as changes to the historic setting, visual character, feeling, or association of nearby historic properties. Aircraft operations are most likely to affect historic structures and districts where setting is an important criterion for significance and where noise could adversely affect those types of resources. The DAF conducted research for NRHP-listed, NRHP-eligible, and unevaluated architectural sites within the DNL 65 dB contour and greater at the airfield. While the cessation of regular 173 FW F-15C/D operations has temporarily reduced the ambient noise levels at historic properties within the APE, the Existing Conditions (2023) is used to represent the established acoustic setting for the purposes of Section 106 analysis. This analytical approach ensures that the effects of the Proposed Action are evaluated relative to the mission's documented long-term footprint, preventing a misleading 'quiet' reference point from skewing the evaluation of project-related impacts on the feeling and setting of historic properties.

Historic properties that would reasonably be affected by visual and noise intrusions, including properties of traditional religious and cultural importance to an Indian tribe, are evaluated for lands

1 located beneath the existing military training airspace from surface level to the ceiling of each plus
2 a 1 mile horizontal buffer.

3 Aircraft operations have the potential to affect historic structures and districts where setting is an
4 important criterion for significance and where noise vibrations from sonic booms or low-level
5 overflights could affect those types of resources. These resources are typically found in the NRHP
6 or State Register.

7 In general, archaeological sites would not be expected to incur effects from aircraft noise or
8 overflight activities associated with the Proposed Action. However, archaeological sites listed in
9 the NRHP were included in the analysis, as some are standing structures and rock art sites.
10 Potential effects on these areas would be the same as potential effects on architectural sites from
11 sonic boom overpressures.

12 Some precontact archaeological sites could contain natural structures such as rock shelters or
13 caves, and petroglyphs or pictographs, which are etched or painted onto the rock surfaces.
14 However, studies have found that these types of natural formations are not affected by noise
15 vibrations, such as sonic booms, any more than by natural erosion, wind, or seismic activity (Battis
16 1983).

17 Visual and noise intrusions could include low-level overflights, sonic booms, and distribution of
18 chaff and flare residual materials. Historic properties potentially affected include significant
19 historic sites such as National Historic Landmarks or properties listed in, or eligible for listing in,
20 the NRHP that qualify because of setting or feeling, historic architectural resources or
21 archaeological resources with standing structures (such as historic ranches or forts that could be
22 affected by vibrations), national historic trails, and traditional cultural places that are associated
23 with places that require isolation or quiet. Noise, including infrequent sonic booms and startle
24 effects on traditional cultural resources, may be related to interference with ceremonies and other
25 traditional activities at sacred sites. Undisturbed habitats, resources, and settings are considered to
26 be critical to religious practices (NPS 1994).

27 Residual chaff and flare materials can land on the ground, structures, or sacred sites. The recent
28 DAF Programmatic Environmental Assessment and historical studies confirm that these residues
29 have low visibility, disperse widely, and do not significantly harm the aesthetic or visual integrity
30 of cultural, architectural, and archaeological resources, including traditional cultural places (DAF
31 2023b; Government Accounting Office 1998). Any fibers that may land generally dissipate within
32 a few days due to mechanical breakdown from wind, sediment erosion, and rain or snow. Chaff
33 residual plastic materials are typically 1 inch by 1 inch. Flare residual plastic materials, usually red
34 or blue in color, can be 1 inch by 2 inches or larger. Chaff and flares would not adversely affect
35 cultural resources. The residual materials from chaff and flares fall to the ground in a dispersed
36 fashion and do not collect in quantities great enough to adversely affect the integrity and
37 subsequent NRHP status of archaeological or architectural resources

38 Experimental data and models (Battis 1988; King 1985; King et al. 1988; Sutherland 1990) show
39 that damage to architectural resources, including adobe buildings, is unlikely to be caused by
40 subsonic noise and vibrations from aircraft overflights. Subsonic, noise-related vibration damage
41 to structures requires high dB levels generated at close proximity to the structures and in a low
42 frequency range (cf. Battis 1983, 1988; USFS 1992). Aircraft must generate an Lmax of at least
43 120 dB to potentially result in structural damage (Battis 1988) and, even at 130 dB, structural

1 damage is unlikely. Sutherland (1990) found that the probability of damage to a poorly constructed
2 or poorly maintained wood frame building is less than 0.3 percent even when the building is
3 directly under a large, high-speed aircraft flying only a few hundred feet AGL.

4 Sonic booms can be associated with structural damage. Overpressure values are used to provide a
5 general picture of pounds per square foot (psf) resulting from sonic booms associated with
6 supersonic flight. Actual overpressure varies based on maneuvers (climb/descent, turns,
7 acceleration/deceleration) and specific weather conditions (winds, vertical temperature/pressure
8 profile). Most damage claims are for fragile or brittle objects, such as glass and plaster. There is a
9 large degree of variability in damage experience, and much damage depends on the pre-existing
10 condition of a structure.

11 Tests by the DAF on sonic booms have found that most structures in good condition are not
12 affected by sonic booms with a peak overpressure of less than 16 psf. Tests by the National
13 Aeronautics and Space Administration have shown that structures in good condition are
14 undamaged by overpressures of up to 11 psf. Damage to plaster is in a comparable range of glass
15 but depends on the condition of the plaster. Adobe faces risks similar to plaster, but assessment is
16 complicated by adobe structures being exposed to weather, where they can deteriorate in the
17 absence of any specific loads. In general, structural damage from sonic booms should be expected
18 only for overpressures over 10 psf (Plotkin and Sutherland 1990).

19 Typical outdoor structures such as buildings, windmills, radio towers, etc., are resilient and
20 routinely subject to wind loads far in excess of sonic boom pressures. Damage to plaster occurs at
21 similar ranges to glass damage. Plaster has a compounding issue in that it will often crack due to
22 shrinkage while curing, or from stresses as a structure settles, even in the absence of outside loads.
23 Sonic boom damage to plaster often occurs when internal stresses are high from these factors.
24 Some degree of damage to glass and plaster should thus be expected whenever there are sonic
25 booms, but usually at a low rate.

26 **3.9.2.1 No Action Alternative**

27 Under the No Action Alternative, the Proposed Action would not be implemented; therefore, no
28 F-35A beddown, associated operational changes, or beddown-related infrastructure construction
29 would occur at LMT/Kingsley Field ANGB. The No Action Alternative is retained as the
30 analytical “not implementing the Proposed Action” scenario for comparison (see Section 3.1).
31 Construction projects to support continued base operations, as identified in Tables 2.1-3 and 2.1-
32 4 and Figures 2.1-1 and 2.1-2, would be implemented. This would include interior renovation of
33 Buildings 130 and 302, and interior renovation of Buildings 220, 221, and 234 if alternate options
34 are selected (see Table 2.1-3).

35 The No Action Alternative operational assumptions used for this analysis are described in Section
36 3.2 and the Final Noise Study (DAF 2026). Implementation of the No Action Alternative would
37 not result in significant effects on cultural resources and no adverse effects per 36 CFR § 800.5(b)
38 with respect to historic properties within the APE (including those within the DNL 65 dB and
39 greater contour and beneath the military training airspace).

3.9.2.2 Proposed Action Alternative

Installation

Archaeological Resources

Implementation of the Proposed Action would result in approximately 933,050 SF of ground disturbance during construction activities. There are no NRHP-eligible or listed archaeological resources in the areas of non-impervious surfaces within the proposed construction footprints (including a 15-meter buffer). It is not expected that undiscovered archaeological resources would be found during implementation of the Proposed Action. However, in the event of an inadvertent discovery during ground-disturbing operations, the following specific actions would occur. The Project Manager would cease work immediately and the discovery would be reported to the Kingsley Field ANGB Environmental Manager. The Environmental Manager would secure the location and ensure that all cultural items are left in place and that no further disturbance is permitted to occur. The Environmental Manager would continue to follow Standard Operating Procedure No. 6, Inadvertent Discovery of Cultural Materials, as outlined in the Kingsley Field ANGB ICRMP (173 FW 2025). Based on the results of the recent archaeological resources survey, the Proposed Action would not impact archaeological resources.

Architectural Resources

The Proposed Action would involve the interior modification of four buildings (Buildings 130, 216, 302, and 331). Interior modifications include demolition and reconstruction of interior walls; upgrading electrical systems; upgrading heating, ventilation, and air conditioning systems; and plumbing upgrades. An additional seven buildings involve interior modification under the alternate options (Buildings 209, 213, 220, 221, 234, 243, and 500). Implementation of the Proposed Action includes exterior renovations and/or additions for Buildings 332 and 333. Building 209 would undergo exterior additions if the alternate option is chosen. Twelve buildings would be demolished under the implementation of the Proposed Action (refer to Table 2.1-3). The NGB has determined that Buildings 219 (maintenance hangar), 325 (aircraft shelter), and 400 (alert hangar) are individually eligible for the NRHP under Criteria A and C. The NGB has also determined that a historic district, the Kingsley Field Alert Hangar District, is present within the installation. The NGB determined that demolition of Building 219 would result in an Adverse Effect to Building 219 and the Kingsley Field Alert Hangar Historic District. NGB and the Oregon SHPO are developing a Memorandum of Agreement pursuant to 36 CFR § 800.6 to resolve the adverse effect. Mitigation measures developed through the Section 106 consultation process are described in Section 3.9.3.

Traditional Cultural Places and Sacred Sites

No known traditional cultural places or Native American sacred sites have been identified within the installation portion of the APE. Therefore, implementation of the Proposed Action would not affect known traditional cultural places or Native American sacred sites within the installation portion of the APE.

1 Off-Installation

2 Based on the projected noise contours for the aircraft operations under the Proposed Action, one
3 historic building is located within the modeled DNL 75 to 80 dB contour (Summers School)
4 (Oregon SHPO 2024b).

5 Under the Proposed Action, up to 24 PAA F-35A aircraft would be based at Kingsley Field ANGB,
6 with the total number of sorties increasing by 2,215 relative to the No Action Alternative. Despite
7 a slight increase in noise from aircraft operations under the Proposed Action, it would not be
8 expected to affect the potential eligibility of the building, as noise from aircraft operations at
9 LMT/Kingsley Field ANGB has been part of the setting of the airfield and surrounding area for
10 decades. Therefore, there would be no adverse effect to the building per 36 CFR § 800.5(b).

11 Military Training Airspace

12 Under the Proposed Action, the F-35A would use a similar altitude profile as the F-15C/D in
13 training; however, a greater proportion of F-35A training (61 percent) would occur above 20,000
14 feet MSL, compared to 45 percent for F-15C/D training under Existing Conditions (2023). The
15 use of low altitudes (between 500 feet AGL and 10,000 feet MSL) would slightly increase from 5
16 percent to 6 percent to satisfy specific low-level training requirements. Concurrently, overall
17 training would place a much greater emphasis on survivability against surface-to-air threats, which
18 drives increased use of high-altitude military training airspace and standoff distances.

19 Section 3.2.2.2 and the Final Noise Study (2026) describe the modeled increases in single-event
20 and cumulative military training airspace noise under the Proposed Action. These modeled
21 changes do not alter the cultural resources effects determination for historic properties within the
22 APE beneath the military training airspace, including traditional cultural places. Supersonic
23 operations for the F 35A would occur above 30,000 feet MSL, and although the frequency of
24 supersonic events would increase, altitude and atmospheric conditions would reduce sonic boom
25 effects at ground level. At these altitudes, sonic boom overpressures at the ground would be
26 expected to remain low; therefore, supersonic operations would not be expected to result in damage
27 to historic structures or adverse effects to historic properties. Based on modeled noise conditions
28 and the altitude of supersonic operations, the Proposed Action would not result in significant
29 effects on archaeological resources, historic structures, or traditional cultural places.

30 Visual intrusions would not result in significant effects on the settings of cultural resources. Due
31 to the high altitude of overflights, small aircraft size at viewing distance, and high speeds, aircraft
32 would not be readily visible to observers on the ground.

33 No ground disturbance would occur under the military training airspace and use of ordnance and
34 defensive countermeasures would occur in areas already used for these activities. The Oregon
35 ANG would continue to implement a minimum release altitude of 5,000 feet AGL for flares
36 deployed in ANG-managed Oregon military training airspace (NGB 2017). The 173 FW would
37 adhere to local operating procedures for chaff and flare release to include the Mountain Home
38 military training airspace and restricted airspace associated with the Saylor Creek Range (DAF
39 2023a). Overall, flares are unlikely to adversely affect cultural resources; therefore, the
40 introduction of material to archaeological sites or standing structures from flare use would not
41 result in an adverse effect.

Historic properties are present within the APE under the military training airspace; however, they would not be adversely affected per 36 CFR § 800.5(b).

Tribal and SHPO Consultation Efforts

The NGB conducted government-to-government consultation with 44 federally recognized Tribal Nations holding traditional ties to lands at LMT/Kingsley Field ANGB and beneath the associated military training airspace. Initial outreach letters were sent in June 2024. The Modoc Nation accepted the invitation, raising concerns in August 2024 regarding wildfire risks from chaff and flare use, but identifying no specific cultural resource or sacred site concerns. In December 2024, the Confederated Tribes of the Grand Ronde Community, the Pit River Tribe, and the Coquille Indian Tribe formally declined further consultation, and outreach initiated with the Shoshone-Paiute Tribes of the Duck Valley Reservation (including follow-up in March 2025) received no response. Additionally, in 2025, NGB consulted with the Klamath Tribes during the permitting and work plan phase of the archaeological survey.

Coincident with the public release of the Draft EIS, the NGB sent document distribution letters on March 12, 2026, and formal notification letters on April 10, 2026, to all 44 previously contacted Tribal Nations, inviting renewed consultation on the draft findings. A specific follow-up consultation letter was also sent to the Modoc Nation on April 10, 2026. Following the April 2026 outreach, the Klamath Tribes concurred with the findings and determinations of the archaeological survey report. The Tribes also stated that they had no comments or concerns regarding potential adverse effects to Building 219 or the newly defined historic district at Kingsley Field.

No comments, requests for formal consultation, or concerns regarding cultural resources, traditional properties, or sacred sites were received from the Shoshone-Paiute Tribes, the Modoc Nation, or any other contacted Tribal Nation following the April 2026 outreach. Consequently, tribal consultation was completed for this undertaking. All consultation correspondence is preserved in Appendix B of this Final EIS.

The NGB conducted formal consultation with the SHPOs of California, Idaho, Nevada, and Oregon in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations under 36 CFR Part 800.

Because the undertaking in California, Idaho, and Nevada is limited entirely to the use of existing military training airspace, consultation for those states was completed with findings of no historic properties affected under 36 CFR § 800.4(d)(1). The Idaho SHPO concurred with this finding on March 14, 2025, followed by the California SHPO on April 24, 2025. The Nevada SHPO did not object within the 30-day regulatory review period, and formally confirmed in an April 3, 2026 email that the NGB had met its Section 106 requirements for Nevada.

Consultation with the Oregon SHPO was initiated in June 2024. On August 12, 2026, the SHPO formally concurred with the NGB's determinations of eligibility for Buildings 219, 325, and 400 and the Kingsley Field Alert Hangar Historic District (36 CFR § 800.4(c)(2)).

The Oregon SHPO also concurred with the NGB's finding that the proposed demolition of Building 219 would constitute an Adverse Effect to the historic district (36 CFR § 800.5(a)). To address this, the NGB and the Oregon SHPO are drafting a Memorandum of Agreement pursuant to 36 CFR § 800.6(c), which outlines the required mitigation measures. For the airspace component, the Oregon SHPO concurred with the NGB's determination of no adverse effect. For

the installation component, Section 106 consultation is proceeding through resolution of the adverse effect and will be completed upon execution of the Memorandum of Agreement. All final correspondence is documented in Appendix B.

3.9.3 Mitigation Measures

The NGB and Oregon ANG will execute a Memorandum of Agreement with the Oregon SHPO pursuant to 36 CFR § 800.6 to resolve the Adverse Effect to Building 219 and the Kingsley Field Alert Hangar Historic District resulting from implementation of the Proposed Action. The Memorandum of Agreement will establish the required mitigation measures. The primary mitigation measure is the design, initiation, and publication of a comprehensive digital Story Map. This digital Story Map would be linked to at least the 173 FW and Oregon National Guard public websites, and its availability would be promoted across appropriate digital media platforms.

Story Map Content Requirements

The NGB and Oregon ANG would ensure the digital Story Map includes a comprehensive historical overview of the facility and its context within the installation.

- **Installation Mapping:** The Story Map would feature a current map of the installation, noting that certain buildings and their functions may be omitted from public maps due to security protocols.
- **Historical Context:** The digital presentation would detail the history of Building 219 as a maintenance hangar, focusing on its defense-related function, use, and significance as a military area.
- **Historic District Significance:** The narrative would discuss the specific significance of Building 219 to the Kingsley Field Alert Hangar Historic District.
- **Base Development:** The project would present Kingsley Field's development from World War II through the Cold War, highlighting the installation's association with the Air Defense Command's fighter interceptor and alert program.

Documentation and Archival Standards

The mitigation would require intensive historical documentation, exhaustive review of primary and secondary sources, and strict adherence to architectural and visual recordation standards.

- **Historical Narrative:** The historical documentation of Building 219 and its historic context will be comparable to the outline format used in Historic American Buildings Survey / Historic American Engineering Record / Historic American Landscapes Survey Guidelines for Historical Reports (2008, 2017). The Story Map will feature a dedicated Works Cited and Bibliography section.
- **Visual Recordation:** Images used in the production of the Story Map will include historic photographs, present-day views, and aerials (subject to licensing agreements) to document changes over time. Digital images taken for Building 219 will follow the Technical Requirements of the NRHP and National Historic Landmarks Program Consolidated and Updated Photograph Policy (2024).

- **Architectural Plans:** NGB will conduct a search for historic blueprints and plans for Building 219 at the base and the National Archives and Records Administration. If original blueprints are not located, NGB will consult with Oregon SHPO on the best alternative method to record the wood truss system utilized in Building 219.

3.9.4 Reasonably Foreseeable Actions and Environmental Trends

No reasonably foreseeable actions have been identified in the project area that are sufficiently certain to occur and sufficiently related in time, location, or nature to warrant consideration in the analysis of cultural resources. Accordingly, no effects from other future actions are included in the cultural resources analysis.

Apart from the effects of the Proposed Action analyzed above, cultural resources conditions in the area are expected to remain generally consistent with existing conditions. Existing military activities, including continued use of the existing military training airspace, would continue as part of ongoing operations. No changes to the existing military training airspace, airspace boundaries, or associated flight procedures have been identified as reasonably foreseeable that would result in additional effects on cultural resources.

No environmental trends have been identified that would reasonably be expected to substantially alter cultural resource conditions within the APE during the analysis period.



**NATIONAL GUARD BUREAU
AIR NATIONAL GUARD READINESS CENTER
3501 FETCHET AVENUE
JOINT BASE ANDREWS, MARYLAND 20762-5157**

02 April 2026

J. Rocco de Gregory
Cultural Resources Program Manager
Air National Guard Readiness Center
3501 Fetchet Avenue
Joint Base Andrews, MD 20762-5157

Chrissy Curran
Deputy State Historic Preservation Officer
State Historic Preservation Office
Oregon Parks and Recreation Department
725 Summer St, Ste C
Salem, OR 97301

Dear Ms. Curran,

The National Guard Bureau (NGB), in coordination with the Department of the Air Force, has prepared a Draft Environmental Impact Statement (Draft EIS) for the proposed basing of the F-35A Lightning II at Kingsley Field Air National Guard Base (ANGB), Klamath Falls, Klamath County, Oregon (reference #: 25-0524). The Proposed Action includes replacing the F-15C/D mission at the 173rd Fighter Wing with the basing and operation of F-35A aircraft, as well as associated facility and infrastructure improvements at Kingsley Field ANGB. The proposal also includes the continued use of existing military training airspace. No changes to the lateral or vertical boundaries of this airspace are proposed.

The Draft EIS evaluates potential impacts on the human and natural environment resulting from the proposed basing and operation of the F-35A squadron, including associated construction, demolition, renovation, and infrastructure improvements. The Draft EIS is available for review at www.kingsleyfieldf35eis.com.

The NGB has determined that the proposed action constitutes an undertaking as defined in 36 CFR § 800.16(y) with the potential to affect historic properties. To meet its obligations under Section 106 of the NHPA, the NGB completed a cultural resource survey of the undertaking's Area of Potential Effect (APE). The APE consisted of 11 discontinuous tracts of land totaling approximately 40 acres where the nature and extent of ground disturbance were unknown. In addition to investigating the 11 tracts for archaeological resources, the survey also examined 43 structures to determine their National Register of Historic Places (NRHP) eligibility. As a result of these investigations, the NGB has preliminarily

determined (pending consultation with your office and interested federally recognized Tribes) that no NRHP-eligible archaeological sites are present within the APE, and that Buildings 219, 325, and 400 are eligible individually and as contributing components of a newly identified historic district.

The cultural resources survey of Kingsley Field evaluated properties from three periods of significance: the World War Two era (1942-1946), the Department of the Air Force active-duty Cold War era (1954-1981), and the Air National Guard Cold War era (1981-1991). The survey found that no historic district exists from the World War Two period, and the majority of common support buildings from the subsequent Cold War periods lack the integrity to be considered for a district. However, the survey recommends the establishment of the Kingsley Field Alert Hangar Historic District, eligible for the National Register of Historic Places under Criteria A and C (Attachment 1). This discontinuous district comprises three facilities critical to the Cold War fighter interceptor mission—Building 219 (Maintenance Hangar), Building 325 (Aircraft Shelter), and Building 400 (Alert Hangar)—with a collective period of significance from 1959 to 1991.

Pending your concurrence regarding the Kingsley Field Alert Hangar Historic District's eligibility, the NGB has determined that the proposed undertaking will have an adverse effect on Building 219 and the proposed district due to its planned renovation/alteration. Should your office concur with these findings, the NGB requests a meeting to consult on possible mitigation efforts to fulfill our obligations under Section 106 of the NHPA.

As a valued consulting party, the NGB formally requests your review and comment on the Draft EIS and your review and concurrence with our NRHP determinations. Please note that Comments must be received no later than 11 May 2026 for consideration in the Final EIS. We are available to meet to discuss the project and answer any questions. If you have questions, please contact J. Rocco de Gregory, Cultural Resources Program Manager (NGB/A4VN), at ATTN: 173 FW EIS, 3501 Fetchet Avenue, Joint Base Andrews, MD 20762-5157, or by email at NGB.CCA4F.NEPACOMMENTSorg@us.af.mil with the subject titled as ATTN: 173 FW EIS.

Sincerely



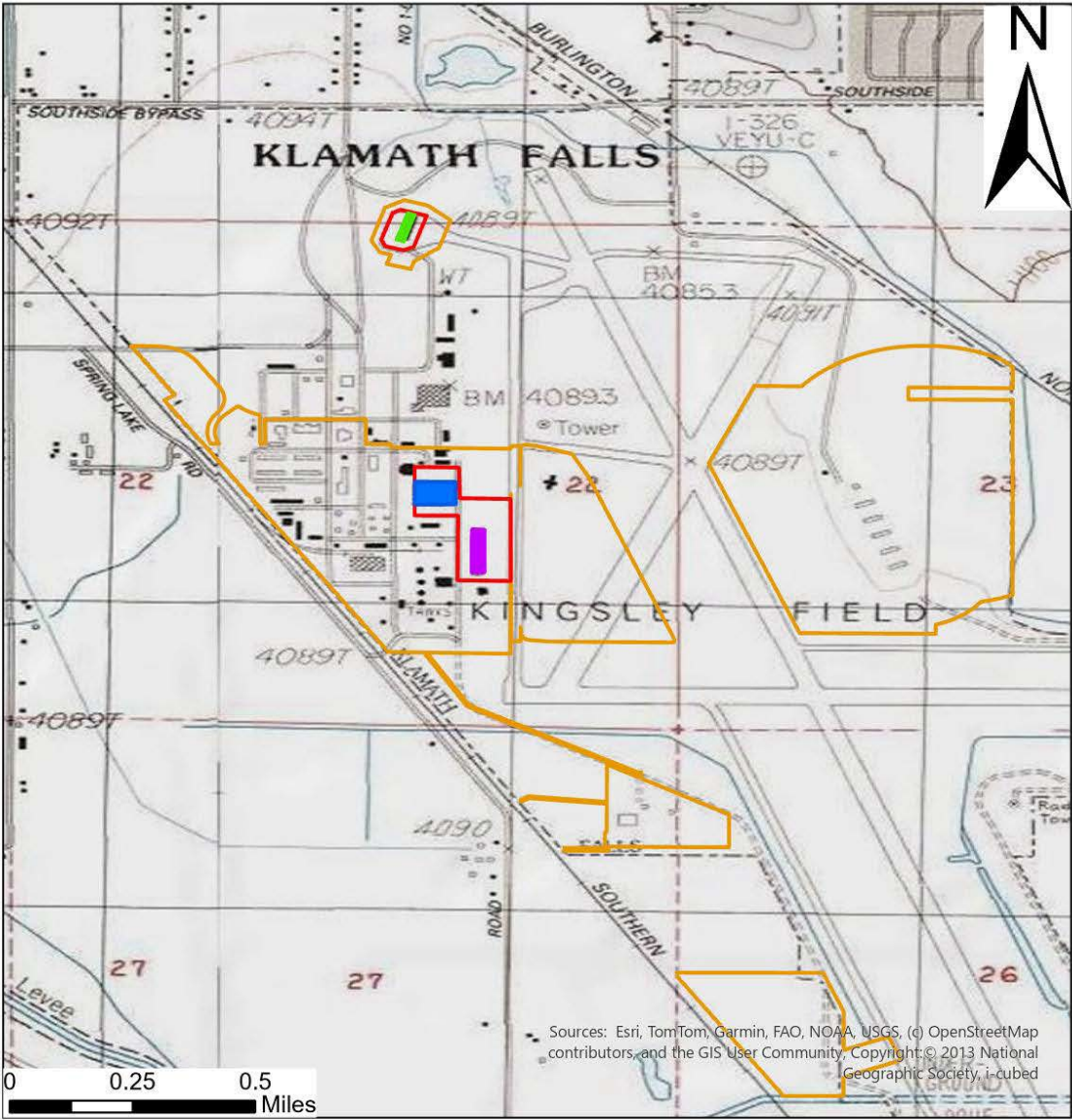
J. Rocco de Gregory RPA, GS-13, DAF
Cultural Resources Program Manager

Attachments:

Attachment 1: Kingsley Field Alert Hangar Historic District maps

Attachment 1

Kingsley Field Air National Guard Base



- | | |
|--------------------|------------------------|
| Kingsley Field | Building Number |
| Historic Districts | 219 |
| | 325 |
| | 400 |

Kingsley Field Alert Hangar Historic District



- | | |
|--|--|
| Kingsley Field | Building Number |
| Historic Districts | 219 |
| | 325 |
| | 400 |



Oregon

Tina Kotek, Governor

Parks and Recreation Department

Oregon Heritage/
State Historic Preservation Office
725 Summer St. NE, Suite C
Salem, OR 97301-1266
(503) 986-0690
Fax (503) 986-0793
oregonheritage.org



August 12, 2026

Rocco de Gregory
NGB/A4VN
3501 Fetchet Ave
Joint Base Andrews, MD 20762

RE: SHPO Case No. 25-0706

NGB, Addition to Building 210 for New Communications Facility

The National Guard Bureau (NGB) is proposing to renovate and construct an addition to Building 210 for the 173 Fighter Wing (173 FW) at Kingsley Field Air National Guard Base (ANGB) in Klamath Falls, Oregon

211 Arnold Ave, Klamath Falls, Klamath County

Dear Rocco de Gregory:

As requested, please find our concurrence on the eligibility determination of facilities 219, 325, 400, and the historic district along with our concurrence on the finding of effect to the airspace.

We concur with the determination that Facilities 219, 325, and 400 are individually eligible for listing in the National Register of Historic Places.

We also concur that Facilities 219, 325, and 400 collectively form the discontinuous Kingsley Field Alert Hangar Historic District. We concur that the historic district is eligible under Criteria A and C for its association with Cold War continental air defense and as a representative example of Cold War-era military architecture.

We concur that there will be no adverse effect to historic properties within the airspace as there will be no adverse effect from the aircraft flying within the area of potential effect.

If you have not already done so, be sure to consult with all appropriate Native American tribes and interested parties regarding the proposed undertaking.

If the undertaking design or effect changes or if additional historic properties are identified, further consultation with our office will be necessary before proceeding with the proposed undertaking. Additional consultation regarding this case must be sent through Go Digital. In order to help us track the undertaking accurately, reference the SHPO case number above in all correspondence.

For future eligibility determinations of this historic property, we encourage referring to National Register Bulletins 15, 16A, and 21 as this submission used an unusual approach to defining the boundaries and contributing/noncontributing status of a historic district. There are several potential alternatives that would simplify a future submission and we would be happy to continue this conversation if requested for a future submission.

Please contact our office if you have any questions, comments or need additional assistance.

Sincerely,

Robert T. Olguin

Robert Olguin
Review and Compliance, Historian
(503) 602-2468
Robert.Olguin@opr.d.oregon.gov

cc: Mark Barron, Ngb/A7AM



August 18, 2026

J. Rocco de Gregory
Cultural Resources Program Manager
Air National Guard Readiness Center
3501 Fetchet Avenue
Joint Base Andrews, MD 20762-5157

Ref: *Kingsley Field, Demolition of Building 219 (OR)*
Klamath County, Oregon
ACHP Case Number: 025441

Dear Mr. Gregory:

On August 12, 2026, the Advisory Council on Historic Preservation (ACHP) received your notification and supporting documentation regarding the potential adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information you provided, we have concluded that Appendix A, *Criteria for Council Involvement in Reviewing Individual Section 106 Cases*, of our regulations, "Protection of Historic Properties" (36 CFR Part 800) implementing Section 106 of the National Historic Preservation Act, does not apply to this undertaking. Accordingly, we do not believe our participation in the consultation to resolve adverse effects is needed.

However, if we receive a request for participation from the Oregon State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer, affected Indian Tribe, a consulting party, or other party, we may reconsider this decision. Should the undertaking's circumstances change, consulting parties cannot come to consensus, or you need further advisory assistance to conclude the consultation process, please contact us.

Pursuant to Section 800.6(b)(1)(iv), you will need to file the final Section 106 agreement document (Agreement), developed in consultation with the Oregon SHPO and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the Agreement and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with your notification of adverse effect. If you have any questions or require our further assistance, please contact me at (202) 517-0212 or by e-mail at ediehl@achp.gov and reference the ACHP Case Number above.

Sincerely,

Emma Diehl
Program Analyst
Office of Federal Agency Programs