PROGRAMMATIC AGREEMENT
BETWEEN THE
NATIONAL NUCLEAR SECURITY ADMINISTRATION NEVADA FIELD OFFICE
AND THE
NEVADA STATE HISTORIC PRESERVATION OFFICER
REGARDING
MODERNIZATION AND OPERATIONAL MAINTENANCE OF THE
NEVADA NATIONAL SECURITY SITE,
AT MERCURY IN NYE COUNTY, NEVADA

WHEREAS, the National Nuclear Security Administration Nevada Field Office (NNSA/NFO) plans to modernize the Nevada National Security Site (NNSS) base at Mercury to meet current and future testing and training requirements, and recognizes that to ensure the NNSS base operates at the high level needed to meet its national security mission, existing structures and infrastructural support systems require (1) repair, upgrades, maintenance, ongoing custodial support and other improvements, or (2) demolition and/or replacement where maintenance and upgrading of structures is not practicable; and

WHEREAS, the NNSA/NFO, in consultation with the Nevada State Historic Preservation Office (SHPO), has determined that the modernization and operational maintenance efforts at Mercury (the undertaking) is an undertaking subject to review under Title 54 U.S.C. § 306108, commonly known as Section 106 of the National Historic Preservation Act (NHPA), Title 54 U.S.C. § 300101, et seq., and its implementing regulations, 36 CFR Part 800; and

WHEREAS, the NNSA/NFO, in consultation with the SHPO, has determined the Mercury Historic District (MHD), described in Appendix A, is eligible for listing in the National Register of Historic Places (National Register) for its national significance and importance in supporting nuclear testing and scientific research from 1951-1992 during the Cold War era; and

WHEREAS, the NNSA/NFO has determined that modernization and maintenance efforts, including new construction, encompassed within the undertaking may have direct, indirect, and cumulative effects on the MHD and has consulted with the SHPO pursuant to 36 CFR 800.14(b) in the development and execution of this PA; and

WHEREAS, the NNSA/NFO has invited the Advisory Council on Historic Preservation (ACHP) to participate in consultation for the development of this Programmatic Agreement (PA) and the ACHP has declined this invitation; and

WHEREAS, the NNSA/NFO has invited the Chemehuevi Indian Tribe, Colorado River Indian Tribes, Kaibab Band of Paiutes, Las Vegas Paiute Tribe, Moapa Band of Paiutes, Pahrump Paiute Tribe, Paiute Indian Tribe of Utah, Duckwater Shoshone Tribe Ely Shoshone Tribe, Timbisha Shoshone Tribe, Yomba Shoshone Tribe, Benton Paiute Tribe, Big Pine Paiute Tribe of the Owens Valley, Bishop Paiute Tribe, Fort Independence Indian Reservation, and Lone Pine Paiute-Shoshone Reservation (collectively referred to as the Tribes), to consult in the Section 106 process as Concurring Parties to this PA, with no responses indicating interest to participate as Concurring Parties; and

WHEREAS, NNSA/NFO will invite the Nevada Test Site Historical Foundation, which does business as the National Atomic Testing Museum (NATM), to host mitigation products produced by this PA in order to augment and enhance its mission, collections, exhibits, and public outreach and has invited them to be a Concurring Party to this PA; and

WHEREAS, the NNSA/NFO has notified the County Commissions of Nye County, NV; Clark County, NV; and the Nevada Test Site Historical Foundation of the undertaking and has invited them to express their views and participate in the development of this PA and the Section 106 process pursuant to 36 CFR § 800.6(a)(4) and 36 CFR § 800.14(b)(2)(ii);

NOW, THEREFORE, the Signatories agree that the undertaking shall be implemented in accordance with the terms of this PA to ensure that the effects of the undertaking on historic properties are taken into account and to satisfy the Section 106 responsibilities of the NNSA/NFO for all aspects of the undertaking.

STIPULATIONS

NNSA/NFO shall ensure that the following measures are carried out:

I. ROLES, RESPONSIBILITIES, STANDARDS, AND PROFESSIONAL QUALIFICATIONS

The Signatories agree that the NNSA/NFO will be responsible for administering and implementing this PA. This includes but is not limited to overseeing all cultural resources work; assembling all submissions to the SHPO including reports, determinations of eligibility and project effect, and treatment or data recovery plans; and seeking SHPO concurrence with all agency compliance decisions. The NNSA/NFO will consult with Tribes whose aboriginal territories include portions of the undertaking or who have previously expressed interest in undertakings within the MHD.

The NNSA/NFO shall ensure that all identification, National Register evaluation, and mitigation activities undertaken to satisfy the terms of this PA meet the Secretary of the Interior's (SOI) Standards for Archeology and Historic Preservation (48 FR 44716) *(Federal Register,* September 29, 1983), hereinafter referred to as Secretary's Standards, are consistent with the ACHP's guidance on archaeology and all applicable NPS guidance for evaluating National Register properties, and where possible adhere to the SOI Standards for the Treatment of Historic Properties and the suggested approaches to new construction in the SOI Standard's for Rehabilitation.

The NNSA/NFO shall ensure that all actions prescribed by this PA shall be carried out by, or under the direct supervision of, a person or persons meeting, at a minimum, the SOI Professional Qualifications Standards for archaeology, history, or architectural history, as appropriate (48 FR 44739). The NNSA/NFO supports a staff of cultural resource management subject matter experts (CRM SME) who meet the qualifications set forth in these Standards, to provide support to the NNSA/NFO Cultural Resource Manager (NFO/CRM) in meeting the obligations of this PA.

II. AREA OF POTENTIAL EFFECT

The undertaking consists of the modernization and operational maintenance efforts at Mercury, Nevada. The Area of Potential Effect (APE) is defined to include the area within which there are potential direct and indirect effects to historic properties from activities associated with the undertaking. The APE may be amended by agreement of the Signatories.

A. Direct Effects
The direct effects area of the APE is the area within which historic properties may sustain physical alteration or destruction as a result of the undertaking. The APE for direct physical effects is influenced by the area of potential ground disturbance by activities related to the undertaking, and will be determined as follows:

1. The APE for demolition/removal of contributing elements will be the footprint of the element area plus a buffer around the element area required for operation of equipment used in demolition and material removal, nominally 25 feet wide around the perimeter of the element area.

2. The APE for modification of contributing elements that will involve ground disturbance will be the footprint of the ground disturbance plus a buffer around the disturbance footprint required for operation of equipment used in modification, nominally 15 feet around the disturbance area.

3. The APE for modification of contributing elements that will not involve ground disturbance will be the footprint of the contributing element plus a buffer required for operation of equipment used in modification, nominally 10 feet around the contributing element.

B. Indirect Effects
The APE for indirect effects is defined as the area where there exist indirect physical, visual, atmospheric and audible effects on historic properties that could diminish the integrity of historic properties for which setting, feeling and/or association are aspects of such integrity. The boundary of the APE as defined in Appendix A is currently considered the APE for indirect effects.

C. Cumulative Effects
Cumulative effects are the reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance, or be cumulative.

D. New Construction
The NNSA/NFO, in consultation with the SHPO, has determined that new construction within the boundary of the MHD may result in visual effects or other indirect effects to the overall historic character of the MHD.

E. Modifying the APE

1. The APE, as currently defined, encompasses an area sufficient to accommodate all of the undertaking activities under consideration as of the date of the execution of this PA. The APE may be modified when tribal consultation, additional field research or literature review, consultation with other consulting parties, or other factors indicate that the qualities and values of historic properties that lie outside the boundaries of the currently defined APE may be affected directly, indirectly, or cumulatively.

2. Any Signatory may propose that the APE be modified by providing written justification and illustration of the proposed APE modification. The NNSA/NFO shall send the modification proposal to the SHPO and consult with them for no more than thirty (30) days in an effort to reach consensus on the proposal. If the Signatories agree to modify the APE, the NNSA/NFO will notify all consulting parties of the decision.

3. The NNSA/NFO may amend the APE as needed or as requested by the SHPO without amending the PA proper. If this occurs, all consulting parties will receive formal notification of the amended APE. Within thirty (30) calendar days of their receipt of the proposed amendment, any Signatory may request that the PA be amended in accord with the process outlined in Stipulation XVI below.

III. EXEMPT ACTIVITIES

A. The NNSA/NFO, in consultation with the SHPO, has determined that certain routine maintenance, repair, and upgrade (MRU) activities associated with the undertaking have little to no potential to affect historic properties or will not result in an adverse effect (Appendix B). The NFO/CRM, in consultation with the CRM SME staff, shall review planned activities following the decision-making process described below to determine whether they fall within the scope of Appendix B prior to commencement of the start of MRU activities. Upon the determination by the NFO/CRM that a proposed activity is included in Appendix B, the NNSA/NFO is not required to consult further with the SHPO for that activity. The internal review process is:

1. The responsible NNSA/NFO Activity Manager will define the project activity and submit a description of the project on Form FRM-0901A to the NFO/CRM for review.

2. The NFO/CRM, in consultation with the CRM SME, determines if the activity is exempt from SHPO review (Appendix B). This may require field assessment by the CRM SME.

3. If the NFO/CRM determines the activity is exempt, then review of the activity is complete and no further review or consultation is required.

B. The list of activities provided in Appendix B may be modified through consultation and written agreement between the NNSA/NFO and the SHPO without requiring an amendment to this PA. The NFO/CRM and supporting CRM SME staff will maintain the master list of exempt activities and will provide an updated list with an explanation of the rationale for classifying the activities accordingly.

C. Activities not identified in Appendix B shall require further review and consultation as outlined in Stipulation V below.

IV. ELEMENT CATEGORY IDENTIFICATION

A. The NFO/CRM and the CRM SME, in consultation with the SHPO, shall develop and label categories of elements within MHD no later than six (6) months following the execution of this PA. A table of these categories will be attached to the PA and labeled Appendix C. Attachment of Appendix C will not require a formal amendment to the PA per Stipulation XVI.

B. NFO/CRM, the CRM SME, and the SHPO may differentiate the element categories by the uniqueness of the element to MHD and within MHD, the historical significance of the element, and whether the element contributes to the National Register eligibility of MHD amongst other possible characteristics. These categories may include, but may not be limited to the following:

1. Category I properties: This category may include elements that are unique to MHD or elements that have only one representative at MHD and therefore might be individually

eligible. This category may also include elements that the Signatories agree should be evaluated for their potential individual eligibility to the National Register if adversely affected by an activity.

2. Category II properties: This category may include elements for which there are several representatives at MHD. The individual members of each class may possess different engineering or architectural characteristics that distinguish them from other classes of similar elements (e.g., warehouses, or World War II era military style construction, or Mid-Century Modern or Late Modern construction style). This category may also include properties that were initially classified as Category I properties until the properties are formally evaluated and determined not to be individually eligible.

3. Category III properties: This category may include elements for which there are several representatives at MHD and those elements possess characteristics that are not unique to MHD but are commonly found in other non-NNSS facilities.

4. Category IV (non-contributing elements) are resources outside the period of significance (later than 1992).

5. Category M are elements in the MHD for which adequate mitigation of adverse effects have been completed (e.g., Bowling Alley).

C. The Signatories may meet, either in person or via conference call, to discuss any possible changes to Appendix C, as they deem necessary. Upon the written agreement of the Signatories, NFO/CRN shall update Appendix C and attach the revised and dated Appendix C to the PA. Attachment of a revised Appendix C will not require a formal amendment to the PA per Stipulation XVI below.

V. REVIEW PROCEDURES FOR NON-EXEMPT PLANNED ACTIVITIES

A. The NFO/CRM determines that the activity is not exempt per Stipulation III.A above.

B. The NFO/CRM, in consultation with the CRM SME, shall determine what element category the activity may affect (Appendix C). This step may require field assessment by CRM SME.

C. If NFO/CRM determines that the activity may affect a Category I element, NFO/CRM shall initiate the procedures found in Stipulation VI below.

D. If NFO/CRM determines that the activity may affect a Category II or III element, NFO/CRM shall initiate the procedures found in Stipulation VII below.

VI. NATIONAL REGISTER EVALUATION OF CATEGORY I ELEMENTS

A. NNSA/NFO, in consultation with SHPO, shall evaluate the Category I element located within the APE for its potential individual National Register eligibility under all of the SOI Significance Criteria, prior to the initiation of any activity that may affect that specific element.

B. NFO/CRM will review the National Register evaluation report and eligibility recommendations provided by the CRM SME. Upon acceptance, the NFO/CRM shall forward this documentation, with a final eligibility determination, to the SHPO for review and concurrence. If NFO/CRM

determines the Category I element individually eligible for the National Register and adversely affected by the activity, NFO/CRM may, at its discretion, concurrently submit the Finding of Adverse Effect (following Stipulation VII below) and mitigation documentation required in Stipulation VIII.A below.

C. The SHPO will review and comment on any adequately documented draft report within thirty (30) calendar days of receipt. If the SHPO fails to respond within thirty (30) calendar days of receipt, NNSA/NFO may assume concurrence with the findings as detailed in the submission and proceed accordingly.

D. The NFO/CRM will take into consideration any comments provided by the SHPO on the draft report, and the mitigation documentation if submitted per Stipulation VI.B above, and shall revise as appropriate.

E. A Category I element that is determined not to be individually National Register eligible at the national level will be considered to be Category II or III for purposes of Stipulation VIII, below.

F. The NFO/CRM shall submit a final National Register evaluation report and the mitigation documentation to the SHPO if submitted per Stipulation VI.B above.

VII. FINDINGS OF EFFECT FOR ACTIVITIES

A. The NFO/CRM, in consultation with the CRM SME, shall apply the criteria of adverse effect found in 36 CFR § 800.5(a)(1) to identify any effects of the activity on historic properties. This step may require a field assessment of the activity APE by CRM SME.

B. If the NFO/CRM determines, in consultation with the CRM SME, that there will not be an adverse effect from a planned activity, the NNSA/NFO shall submit the finding of No Adverse Effect for the activity with documentation to the SHPO for review and concurrence. If the SHPO fails to respond to the NFO/CRM within fifteen (15) calendar days of the receipt of an adequately documented submission, the NFO/CRM may assume concurrence with the finding of No Adverse Effect and may initiate the activity.

C. If the NFO/CRM determines, in consultation with the CRM SME, that there will be an adverse effect from a planned activity, the NNSA/NFO shall submit the finding of Adverse Effect for the activity with documentation, including a description of the proposed mitigation consistent with Stipulation VIII.A below, to the SHPO for review and concurrence. If the SHPO fails to respond to the NFO/CRM within thirty (30) calendar days of the receipt of an adequately documented submission, the NFO/CRM may assume concurrence with the finding of Adverse Effect and proceed to Stipulation VIII below.

NFO/CRM may, at its discretion, concurrently submit the mitigation documentation required in Stipulation VIII.A or VIII.C below.

VIII. MITIGATION OF ADVERSE EFFECTS AND REVIEW PROCEDURES FOR MITIGATION PRODUCTS

A. Standard Mitigation for Category I Historic Properties:

1. NFO/CRM shall ensure that supporting CRM SME staff will individually record the historic property on a SHPO Architectural Resource Assessment (ARA) form; and

2. For Category I properties that NFO/CRM, in consultation with the SHPO, has determined to be individually eligible under the SOI Significance Criteria at the national level, NFO/CRM shall ensure that supporting SME staff will take detailed high quality large format black and white photographs of the historic property, consistent with the National Park Service's photographic guidelines (https://www.nps.gov/hdp/standards/PhotoGuidelines.pdf. and the plan for photography in Appendix D.

   For Category I properties that the NFO/CRM, in consultation with the SHPO, has determined do not meet the national-level individual eligibility standards under the SOI Significance Criteria described above, they will be considered to be Category II properties and will be mitigated by Stipulation VIII.C below.

3. Current annotated sketch plans (which briefly indicate room layout and use, if known) for any architectural resources or copies of historic facility architectural drawings if available. Photo views should be keyed to the plan and should include keys for interior photos.

4. Brief, dated, letter report (cover sheet) describing mitigation contents and including a summary of significance of the historic property.

B. Review of Standard Mitigation for Category I Historic Properties:

1. NFO/CRM shall electronically submit draft ARA forms and images of the historic property (draft documents) prepared in accord with Stipulation VIII.A above to the SHPO for review and comment.

2. The SHPO will review and comment on the draft documents within fifteen (15) calendar days from date of receipt. If the SHPO concurs that the draft documents are adequate or does not respond within fifteen (15) calendar days, the NFO/CRM shall assume concurrence and, with CRM SME staff support, finalize the ARA forms and the detailed large format photographs.

3. If the SHPO does not concur with the adequacy of the draft documents, then NFO/CRM and supporting CRM SME shall review the comments and address any changes requested by the SHPO and submit final draft documents to the SHPO.

4. Upon SHPO acceptance of the final draft documentation described in Stipulation VIII.B.2-3 within fifteen (15) calendar days of receipt, NNSA/NFO may initiate any part of the activity. If the SHPO does not respond within fifteen (15) calendar days of receipt, the NFO/CRM shall assume acceptance and may inform the Activity Manager that the activity may commence.

5. NNSA/NFO will submit the final documentation, which may include but is not limited to ARA forms, photographs, negatives, contact sheets, and facility architectural drawings, to the Nuclear Testing Archive in Las Vegas, for inclusion in their collection.

C. Standard Mitigation for Category II and III Elements:

1. NFO/CRM, in consultation with CRM SME support, shall ensure that a representative member of each element class found in Appendix C shall undergo or has undergone mitigation prior to the initiation of any aspects of the activity that would adversely affect members of the element class. Mitigation shall consist of documentation of a representative element or elements as follows:

    a. NFO/CRM shall ensure CRM SME staff will record one or more members of the element class on a SHPO ARA form; and

    b. NFO/CRM shall ensure CRM SME staff will take high-quality digital images of one or more members of the element class consistent with the plan for photography found in Appendix D; and

    c. For Category II properties only, current annotated sketch plans (which briefly indicate room layout and use, if known) for any architectural resources or copies of historic facility architectural drawings if available. Photo views should be keyed to the plan and should include keys for interior photos.

    d. For Category II properties only, NFO/CRM shall prepare a letter report describing the element class and its historic significance in the context of the MHD.

    e. NFO/CRM shall ensure recordation procedures will precede commencement of the activity adversely affecting an element class; however, in some cases CRM SME staff may conduct the recordation procedures concurrent with the activity (e.g., when the activity will expose hidden elements such as buried water lines, electric or plumbing fixtures within walls or under flooring). NFO/CRM shall clearly indicate when concurrent documentation will be necessary in the submission prepared in accord with Stipulation VIII.D below.

2. NFO/CRM, in consultation with the CRM SME, may determine that additional members of the element class shall be documented in accord with Stipulation VIII.C.1 (a-d) above if there is significant variation within the class.

D. Review of Standard Mitigation for Category II and III Elements.

1. NFO/CRM shall electronically submit draft ARA forms and digital images of the element (draft documents) prepared in accord with Stipulation VIII.C above to the SHPO for review and comment.

2. The SHPO will review and comment on the draft documents within fifteen (15) calendar days from date of receipt. If the SHPO concurs that the draft documents are adequate or does not respond within fifteen (15) calendar days, NFO/CRM shall assume concurrence and, with CRM SME staff support, finalize the ARA forms and digital images.

3. If the SHPO does not concur with the adequacy of the draft documents, then NFO/CRM and supporting CRM/SME staff shall review the comments and address any changes requested by the SHPO and submit draft final documents to the SHPO.

4. Upon SHPO acceptance of the draft final documentation described in Stipulation VIII.D.2-3 within fifteen (15) calendar days of receipt, NNSA/NFO may initiate any part of the activity.

If the SHPO does not respond within fifteen (15) calendar days, NFO/CRM shall assume acceptance and may inform the Project Manager that the activity may commence.

5. NNSA/NFO with CRM SME staff will submit the final documentation, which may include but is not limited to ARA forms, digital image files, and facility architectural drawings, to the Nuclear Testing Archive in Las Vegas, for inclusion in their collection.

E. Adequacy of Standard Mitigation for Category II and III Elements.

1. NFO/CRM, in consultation with the SHPO, may determine that the final mitigation documents for a specific element class prepared in accord with Stipulation VIII.D.2-3 above are adequate as a representative sample for all members of that element class and no additional mitigation will be required for future adverse effects to elements of that class.

   a. NFO/CRM shall submit their determination that no additional mitigation will be required for that specific class accompanied by the final mitigation documents prepared in accord with Stipulation VIII.D.2-5 for the element class to the SHPO for review and comment.

   b. The SHPO will review and comment on the adequately documented submission within fifteen (15) calendar days from date of receipt. If the SHPO concurs with the NNSA/NFO's determination or does not respond within fifteen (15) calendar days, NFO/CRM shall assume concurrence and no further mitigation for future adverse effects to elements of that specific class will be required.

   c. If the SHPO does not concur with the adequacy of the documentation submission, the NFO/CRM, with CRM SME staff support, shall review the comments and address any changes requested by the SHPO and shall submit a response to the SHPO.

   d. Upon SHPO concurrence with the NFO/CRM determination, NFO/CRM will document all future adverse effects to elements in that specific class in a table submitted with the Annual Report required in Stipulation XI below.

F. The direct and indirect effects to the MHD from new construction in the MHD will be mitigated in accord with the requirements of Stipulation IX below.

IX. INFORMATION PRESERVATION, PUBLICATION, AND PUBLIC OUTREACH

A. As part of mitigation of extant cumulative effects on the MHD, the NNSA/NFO with CRM SME support has prepared a historic context report for Mercury (Reno et al. 2018) describing its origin, history, layout and construction; its administrative, scientific, and residential functions; its significance in the development of the Nevada Test Site and its accomplishments; and its character as a community.

B. Copies of completed ARA forms, databases, photographs, image files, and reports produced as part of this PA will be archived with the Nuclear Testing Archive.

C. Additional documentation and mitigation products (e.g., brochures, pamphlets, video documentaries, presentations, oral and written histories, etc. and curation of artifacts focused on the history and purpose of Mercury) will be considered to augment and enhance the mission,

collections, exhibits, and public outreach of the NATM, an independent Smithsonian-affiliated museum located in Las Vegas devoted to highlighting the NNSS's achievements and history.

X. POST-REVIEW DISCOVERIES OR UNANTICIPATED EFFECTS

If historic properties are discovered or unanticipated effects on historic properties occur within the APE after an activity has been initiated, NNSA/NFO personnel shall implement the following procedure:

A. The Activity Manager shall immediately cease all operations within 10 feet of the portion of the activity where the discovery was made or that has had unanticipated effects to an historic property, and notify the NFO/CRM of the discovery or effect.

B. The NFO/CRM shall ensure that CRM SME assesses the National Register eligibility of the discovery or has evaluated the potential of the activity to affect the qualifying characteristics of a historic property. The CRM SME shall report to the NFO/CRM of its findings and a treatment plan to avoid or mitigate the effect, as appropriate.

C. The NFO/CRM shall submit NNSA/NFO's determination of National Register eligibility or discussion of unanticipated effect electronically to the SHPO along with any treatment plan developed as appropriate within five (5) working days of the discovery or identification of unanticipated effect.

D. The SHPO will have five (5) working days from their receipt to provide their comments on the National Register eligibility determination or discussion of unanticipated effects and any draft historic properties treatment plan (HPTP) submitted.

E. The NFO/CRM shall notify Tribes of discoveries that have the potential to affect properties of religious or cultural significance to them, or that meet the criteria of the Native American Graves Protection and Repatriation Act (NAGPRA). After reviewing such discoveries, the Tribes may request further consultation on the project by notifying the NNSA/NFO in writing. NNSA/NFO shall notify the SHPO of any such requests.

F. Following consultation with the SHPO and other parties as appropriate to the discovery, the NFO/CRM shall implement the HPTP.

G. The NFO/CRM may advise the Activity Manager to resume the activities that were halted to address the discovery or unanticipated effect situation upon completion of the fieldwork portions of the HPTP.

XI. ANNUAL REPORT

The NNSA/NFO shall ensure that an Annual Report is prepared regarding progress in the implementation of this PA and is distributed to the SHPO no later than January 31 after the end of the federal fiscal year reported. The reporting period shall be the fiscal year from October 1 to September 30. The annual report shall include, but not be limited to:

A. A discussion of the current status of recordation of contributing elements of the MHD; and

B. A list of routine activities for which no consultation occurred in accord with Stipulation III; and

C. A discussion or list of mitigation activities performed during the previous year per Stipulation VIII; and

D. An account of activities conducted during the previous year that supported preservation and public promulgation of Mercury's history; and

E. Planned activities affecting the management of the MHD in the upcoming year; and

D. Any issues that are affecting or may affect the ability of the federal agency to continue to meet the terms of this PA; and

E. A table of activities that have adversely affected Category II properties where a representative example of that class has already be mitigated in accord with Stipulation VIII.E.; and

F. New master plan documents or other site plans as available and appropriate. NNSA/NFO shall label the documents in alphabetical order (starting with Appendix E) and attach them to the PA. This modification to the PA will not require a formal amendment per Stipulation XVI below.

G. Other pertinent matters.

XII. ANNUAL MEETING

The NNSA/NFO may coordinate a yearly meeting of the Signatories, if deemed necessary by those parties, to discuss activities carried out pursuant to this PA during the preceding year and activities scheduled for the upcoming year.

XIII. DISPUTE RESOLUTION

Should any Signatory or Concurring Party to this PA object at any time to any actions proposed or the manner in which the terms of this PA are implemented, NNSA/NFO shall consult with such party to resolve the objection. If NNSA/NFO determines that such objection cannot be resolved, NNSA/NFO will:

A. Forward all documentation relevant to the dispute, including the NNSA/NFO's proposed resolution, to the ACHP. The ACHP shall provide NNSA/NFO with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, NNSA/NFO shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP, the SHPO, or the Concurring Parties and provide them with a copy of this written response. NNSA/NFO will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period, NNSA/NFO may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, NNSA/NFO shall prepare a written response that takes into account any timely comments regarding the dispute from the SHPO or Concurring Parties to the PA, and provide them and the ACHP with a copy of such written response.

C. NNSA/NFO's responsibility to carry out all other actions subject to the terms of this PA that are not the subject of the dispute remain unchanged.

XIV. ANTI-DEFICIENCY ACT

The NNSA/NFO obligations under this PA are subject to the availability of appropriated funds, and the stipulations of this PA are subject to the provisions of the Anti-Deficiency Act. The NNSA/NFO shall make reasonable and good faith efforts to secure the necessary funds to implement this PA in its entirety. If compliance with the Anti-Deficiency Act alters or impairs the NNSA/NFO's ability to implement the stipulations of this PA, the NNSA/NFO shall consult in accordance with the amendment and termination procedures found at Stipulation XVI of this PA.

XV. EMERGENCY ACTIONS

A. Emergency actions are those actions deemed necessary by the NNSA/NFO as an immediate and direct response to an emergency situation, which is a disaster or emergency declared by the President, tribal government, or the governor of the state, or other immediate threats to life, health, or property. Emergency actions under this PA are only those implemented within thirty (30) calendar days from the initiation of the emergency situation.

B. If the emergency action has the potential to affect historic properties, the NNSA/NFO shall notify the SHPO, interested Indian tribes, and other parties as appropriate prior to undertaking the action, when feasible. As part of the notification, the NNSA/NFO shall provide a plan to address the emergency. The SHPO and other parties shall have seven (7) calendar days to review and comment on the plan to address the emergency. If the SHPO and other parties do not comment or object to the plan within the review period, the NNSA/NFO shall implement the proposed plan.

C. If the NNSA/NFO is unable to consult with the SHPO and other parties prior to carrying out emergency actions, the NNSA/NFO shall notify the SHPO and other parties as appropriate within forty-eight (48) hours after the initiation of the emergency action. This notification shall include a description of the emergency action taken, the effects of the action(s) to historic properties, and, where appropriate, any further proposed measures to avoid, minimize, or mitigate potential adverse effects to historic properties. The SHPO and other parties shall have seven (7) calendar days to review and concur on the proposal where further action is required to address the emergency. If the SHPO and other parties do not object to the plan within the review period, the NNSA/NFO shall implement the proposed plan.

D. Where possible, the NNSA/NFO shall ensure that such emergency actions shall be undertaken in a manner that does not foreclose future preservation or restoration of historic properties. Where such emergency actions may affect historic buildings, they shall be undertaken in a manner that is consistent with the SOI Standards for the Treatment of Historic Properties (http://www.nps.gov/tps/standards.htm). In addition, where possible, the NNSA/NFO shall ensure that such actions shall be done with on-site monitoring by the appropriate preservation professional who meets, at a minimum, the Professional Qualifications Standards in his or her field of expertise.

E. Where the SHPO and/or any other party has reason to believe that a historic property may be adversely affected by an emergency action, the party shall submit a request to the NNSA/NFO to review and comment on that action.

F. Immediate rescue and salvage operations conducted to preserve life or property are exempt from these and all other provisions of this PA.

XVI. AMENDING AND TERMINATING THE AGREEMENT

A. Any Signatory to this PA may at any time propose amendments, whereupon the Signatories shall consult for no more than thirty (30) working days to consider such amendments pursuant to 36 CFR 800.6(c)(7) and 800.6(c)(8). This PA may be amended only when such an amendment is agreed to in writing by both Signatories. The amendment will be effective on the date a copy signed by both Signatories is filed with the ACHP.

B. If either Signatory to this PA determines that its terms will not or cannot be carried out, or objects at any time to any actions proposed or the manner in which the terms of this PA are implemented, that Signatory shall immediately consult with the other Signatory to develop an amendment. If within thirty (30) days (or another time period agreed to by the Signatories) an amendment cannot be reached, either Signatory may terminate the PA upon written notification to the other Signatory.

C. Should this PA be terminated, then the NNSA/NFO will either consult in accordance with 36 CFR 800.14(b) to develop a new PA or, beginning with the date of the termination, the NNSA/NFO will ensure that the actions covered by this PA will be reviewed individually in accordance with 36 CFR 800.4-800.6.

XVII. DURATION OF THE AGREEMENT

This PA shall become effective on the date the last Signatory signature is affixed below, and shall remain in effect until terminated or in twenty (20) years from the date of its execution, whichever comes first. If the Undertaking has not been initiated within five (5) years of execution, the PA will automatically terminate.

The NNSA/NFO may consult with the SHPO prior to expiration in order to reexamine terms of this PA, determine if those terms remain acceptable, and renew the PA for another period of time not to exceed twenty (20) years.

XVIII. EXECUTING THE AGREEMENT

Execution of this PA by NNSA/NFO and the SHPO, and implementation of its terms constitutes evidence that NNSA/NFO has taken into account the effects of this undertaking on historic properties and afforded ACHP an opportunity to comment. The Signatories to this PA have the authority to sign for and bind the entities on behalf of whom they sign.

SIGNATORIES:

National Nuclear Security Administration Nevada Field Office, US Department of Energy

Steven J. Lawrence Date: 6.21.18
Steven J. Lawrence
Nevada Field Office Manager

Nevada State Historic Preservation Officer

Rebecca L Palmer Date: 06/26/18
Rebecca Lynn Palmer
State Historic Preservation Officer

CONCURRING PARTIES:

National Atomic Testing Museum

_____ Date: _____
Name
Title

Chemehuevi Indian Tribe

_____ Date: _____
Name
Title

Colorado River Indian Tribes

_____ Date: _____
Name
Title

Kaibab Band of Paiutes

_____ Date: _____
Name
Title

Las Vegas Paiute Tribe

_____ Date: _____
Name
Title

Moapa Band of Paiutes

_____ Date: _____
Name
Title

Pahrump Paiute Tribe

_____ Date: _____
Name
Title

Paiute Indian Tribe of Utah

_____ Date: _____
Name
Title

Duckwater Shoshone Tribe

_____ Date: _____
Name
Title

Ely Shoshone Tribe

_____ Date: _____
Name
Title

Timbisha Shoshone Tribe

_____ Date: _____
Name
Title

Yomba Shoshone Tribe

_____ Date: _____
Name
Title

Benton Paiute Tribe

_____ Date: _____
Name
Title

Big Pine Paiute Tribe of Owens Valley

_____ Date: _____
Name
Title

Bishop Paiute Tribe

_____ Date: _____
Name
Title

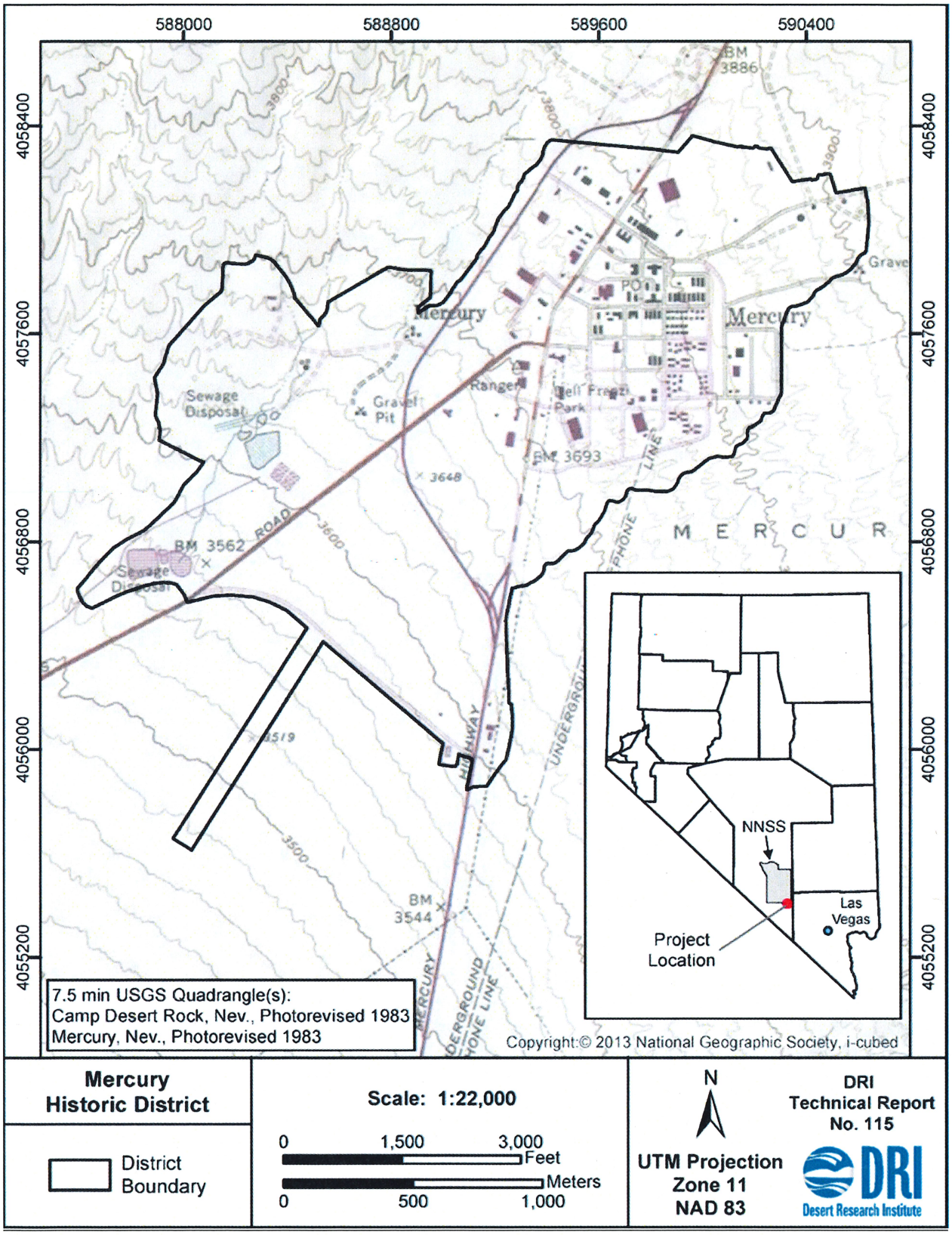
Fort Independence Indian Reservation

_____ Date: _____
Name
Title

Lone Pine Paiute-Shoshone Reservation

_____ Date: _____
Name
Title

APPENDIX A: Area of Potential Effect (APE) for the Mercury Historic District



Mercury, Nevada, was initially established in 1951 as Base Camp Mercury, a "minimal needs" base camp and staging area to provide basic facilities for personnel conducting early atomic tests on what was then known as the Nevada Proving Grounds. With the formal designation of the Atomic Energy Commission's Nevada Test Site in December 1950, Camp Mercury expanded to provide a greater range of necessary services of a larger administrative and research staff, military personnel, and construction crews. As nuclear and other test activities increased and became year-round activities in the 1950s and 1960s, Mercury grew to become a permanent civilian-style residential community as well as administrative and research center, with a population numbering in the thousands – one of the largest communities in southern Nevada. Many of Mercury's structures and utilities date to this period of expansion and community development. In the 1970s-1980s, the town's residential population declined substantially as testing programs were reduced or curtailed and workers commuted from Las Vegas. In 1992, nuclear testing was suspended and the community underwent significant downsizing: most service facilities were shut down, the resident population was limited to a 'skeleton crew' of security personnel, and the structural footprint was reduced.

Mercury retains its role as the NNSS administrative base and staging area for a new generation of testing and training with new requirements. The remaining structures from the 1950s-1960s boom years are insufficient to meet new mission needs, base facilities require modernization, and safety hazards posed by disuse, deterioration, and harmful building materials must be eliminated.

Mercury's historic legacy as the headquarters of a major Cold War battlefield (Fehner and Gosling 2002) is captured in the designation of the Mercury Historic District (MHD). An inventory of structures and accessory elements of the MHD was undertaken in 2016, resulting in the recordation of Architectural Resource Assessment forms for 150 separate lots in the MHD, each containing one or more structures and/or accessories (Reno et al. 2018). These records provide a basis for mitigation strategies of different categories of architectural resources.

References:

Fehner, Terrence R., and F.G. Gosling, 2002. *Origins of the Nevada Test Site*. DOE/MA-0518. US Department of Energy, Washington, DC.

Reno, Ron, Cheryl M. Collins, and Maureen King, 2018. *The Architecture of Mercury – Nevada's Atomic Boom Town, An Architectural Survey of Mercury, Area 23, Nevada National Security Site, Nye County, Nevada*. DOE/NV/0003590-09, Cultural Resources Technical Report No. 115 Rev 1, Division of Earth and Ecosystems Sciences, Desert Research Institute, Las Vegas, Nevada.

APPENDIX B: Maintenance and Operation Activities Exempt from SHPO Review

In accordance with 36 CFR 800.3(a)(1) and Stipulation III of this PA, NNSA/NFO, in consultation with the SHPO, has determined that the following routine activities are determined to have little to no potential to affect historic properties or will not result in an adverse effect and are exempt from SHPO review. They are included in the annual report on implementation of the PA. **Note:** ***All activities with the potential to affect cultural resources are subject to NFO/CRM review to verify they fall within the exemption category by application of FRM-0901A.*** Specifically, exempt activities include the following:

A. Normal service and custodial activities in and around buildings or grounds, including the mowing within previously mowed areas, trimming grass, shrubs, or trees; moving furniture and equipment; housekeeping services; maintenance and repair of vehicles and equipment; care and maintenance of tools, surfaces, and equipment; periodic replacement or expendable parts (lighting, filters, etc.); and other routine maintenance and upkeep of lots and grounds.

B. Interior reconfiguration of modular furniture, offices, conference rooms, office and conference room equipment, and other work environments. Interior reconfiguration only applies to moveable furniture, partitions that are not full height, and equipment. Reconfiguration includes integration of new audio/visual equipment, projectors, screens, wall mounted TVs, and other equipment provided reconfiguration is in keeping with the historic character of the building.

C. Exterior maintenance and repair.
   1. Roof repair with materials that closely resemble the historic materials and form.
   2. Flat or shallow pitch roof repair or replacement (shallow pitch is defined as a pitch with a rise-to-run ratio equal to or less than 3" to 12") with no part of the surface of the roof visible from the ground.
   3. Painting over previously painted exterior surfaces with like color, provided destructive surface preparation treatments are not used (such as water-blasting, sandblasting and chemical removal).
   4. Installation or replacement of rain gutters, downspouts and extensions, provided that the color and style of the extensions is historically appropriate for the building.
   5. Building cleaning in accordance with the Standards and Preservation Briefs #1, #6, and #10.
   6. Repairing masonry in accordance with the Standards and Preservation Brief # 2.
   7. Installing energy-efficient windows only in locations where the building's original historic windows have previously been replaced and in a manner that does not change the appearance of the interior or exterior of the building. Repair of elements that are deteriorated beyond repair on primary windows, and window frames with in-kind materials.
   8. Installing storm windows, storm doors or wood screen doors in a manner that does not harm historic windows, doors or trim.
   9. Repair and replacement of doors in locations where the building's original historic doors have previously been replaced and in a manner that does not change the appearance of the interior or exterior of the building. Repair of elements that are deteriorated beyond repair on primary doors, and doorframes with in-kind materials (including entrance/exit doors, office doors, roll down doors, hardware and mechanical equipment such as hand crank mechanisms, motors, springs, hinges, locks, door knobs, etc.).
   10. Window or glazing treatments (i.e. solar films, curtains, solar screens) that do not change the appearance of the interior or exterior of the building.

D. Interior maintenance and repair.
   1. Re-painting previously painted interior surfaces, provided destructive surface preparation treatments are not used (such as water-blasting, sandblasting, and chemical removal).

2. Replacement of carpeting with like style in a manner that does not harm historic flooring.
3. Routine maintenance and repair of common interior surfaces and fixtures (including but not limited to patching/repairing drywall and plaster walls, wall texture, countertops, cabinets, ceiling tiles, display cabinets, shelving, bulletin boards, white boards, chalk boards, etc.).

E. Weatherization and sealing of air leaks of the building shell or around fixtures including windows and doors, and installing thresholds in a manner that does not harm or obscure historic windows or trim (no spray foam to be used).

F. Installing vents if not located on a primary roof elevation or not visible from ground level rights-of-way. Installing foundation vents, if painted or finished to match the existing foundation material.

G. Maintenance, repair, and installation of thermal insulation in walls, floors, ceilings, attics, and foundations in a manner that does not harm or damage historic fabric and does not result in visible holes drilled through exterior siding or where holes visibly alter the exterior. Insulation of pipes, water heaters, and ductwork (no spray foam to be used).

H. Electrical, computer, and communication systems. Maintenance, repair, replacement, and upgrade of electrical, communications, and computer systems, etc. (including but not limited to wiring, cabling, grounding, switches, electrical panels and breaker boxes, lighting fixtures (*does not apply to Category I properties*), energy efficiency improvements in exterior or interior lighting, replacement with energy-efficient appliances, motors, etc.), provided such maintenance and repair activities use "in kind" materials, use designs in keeping with the character-defining elements of the structure, or are not visible from the right-of-way. New installation of non-hard wired devices such as photo-controls, occupancy sensors, thermostats carbon dioxide, humidity, light and other control sensors, in a manner that does not permanently change the character-defining appearance of the building. Installation of new lighting controls including photo-sensors if not visible from ground level rights-of-way, and new metering devices installed in a manner that does not permanently change the appearance of the building, or if the addition is not visible from ground level rights-of-way.

I. Plumbing maintenance and repair of existing water and sewer systems. Repair or replacement and installation of plumbing fixtures (including but not limited to showers and shower pans, sinks, tubs, faucets, water heaters, waste heater recovery systems, sprinkler systems, water conservation or water-efficient fixtures and fittings) in a manner that does not permanently change the appearance of the building from the view of ground level rights-of-way.

J. Cleaning, tuning, maintenance, repair, and modification of elements of existing heating, ventilation and air conditioning (HVAC) systems and controls. Replacement of existing HVAC equipment that do not require a change to existing ducting, plumbing, electrical, controls or a new location, or if ducting, plumbing, electrical and controls are on the rear of the structure or not visible from ground level rights-of-way. Modification of ductwork provided it does not affect a permanent change to the appearance of the building or is not visible from ground level rights-of-way. Installation of new HVAC equipment in a manner that uses materials consistent with the character-defining features of the structure, does not permanently change the appearance of the building, or is not externally visible from ground level rights-of-way.

K. Installation, maintenance, repair, replacement, or modification of personnel safety systems and devices (including but not limited to sprinkler systems and other fire suppression systems, smoke/carbon monoxide detectors, radiation monitoring devices, emergency exit lighting

systems, protective additions to electrical equipment, improvements to walking and working surfaces, or installation of protective railings, guards, or shielding) provided that installation and modification does not alter or detract from character-defining features of the structure. Repair of outdoor and parking lot lighting for safety and security. Installation of ADA-compliant safety systems will be conducted in accordance with the Standards and Preservation Brief # 32.

L. Security systems repair, maintenance, replacement, or modification. Installation of security systems can be conducted if such systems match existing security systems, or if they do not alter or detract from character-defining elements of the structure, or if they are not visible from ground level rights-of-way.

M. Removal or fixing asbestos (limited to pipe/ductwork, lagging, insulation, and flooring with replacement with like / in-kind materials that maintain the historic character of the facility) for safety and health concerns.

N. Siting, installation, maintenance, or rehabilitation of solar or wind power systems, including systems on the roof of the structure, behind the parapet or not visible from ground level rights-of-way, and that will not require new building reinforcement or if ground-mounted can be installed without ground disturbance. Removal of unused, broken, or dysfunctional solar or wind systems that were not original structures of a building and that can be removed without additional ground disturbance.

O. Repairs to basic utilities (water and sewer mains, power lines, or communications lines) both aboveground and buried. Excavating to gain access to existing underground utilities to repair them, provided that the work is performed consistent with previous conditions. Work will not extend beyond area excavated or impacted during original placement without a cultural resource review.

P. Equipment repairs, portable equipment and appliance replacement, and minor alterations or upgrades to active laboratories and other facilities.

Q. Installation of roadway and building signage including roadway directional signage, traffic signage, safety and security signage, parking signs, protective signage, and address and building/structure labels consistent with standard safety, security, and identification requirements and purposes. If proposed signage has the potential to damage the surface of a historic building, this exemption does not apply.

R. Resurfacing, repair, regrading, rehabilitation, maintenance, and replacement of existing paved roadways, shoulders, sidewalks and parking areas with materials of similar appearance. Work will not extend beyond previously disturbed areas without a cultural resource review.

S. Maintenance or repair of existing dirt or gravel roads, culverts, and drainage channels. Chipping and sealing work on existing gravel roadways and lots. Work beyond boundaries of an existing road or channel will require a cultural resource review.

T. Maintenance, removal of stored equipment (provided this is not historic equipment related to the site's mission and historic significance) and supplies, and cleanup and grading of existing parking lots, vacant lots, equipment yards, and lay-down yards that do not result in additional ground disturbance. Work will not extend beyond previously disturbed areas without a cultural resource review.

U. New landscaping (not including removal of mature trees) and rodent control; spraying and mowing for weed control. There should be no new ground disturbance without a cultural resource review.

V. Routine disposal and management of trash and waste at existing landfill sites.

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
I	**26NY15777**		**Mercury Airfield**		x	
M	**B14451**	**23-517**	**Bowling Alley**		x	
M			Garbage Enclosure	AR1		x
II	**B15215**	**23-128**	**Certified Packaging Center**		x	
			Loading Dock	AR1	x	
			Storage Shelter	AR2	x	
			Boxcar	AR3	x	
			Retention Basin	AR4	x	
II	**B15216**	**23-129**	**Shop/Warehouse**		x	
			Foundation Slab for Tool Crib Warehouse	23-138	x	
			Portable Building	AR1	x	
			Concrete Slab	AR2	x	
			Shed	AR3	x	
			Foundation Slab	AR4	x	
			Foundation Slab for Welding Shop	AR5	x	
I	**B15217**	**23-180**	**RAMATROL**		x	
			Containment Pad	AR1	x	
II	**B15218**	**23-W11**	**Warehouse**		x	
			Storage	AR1	x	
			Shelter	AR2	x	
			Shelter	AR3	x	
I	**B15219**	**23-160**	**Warehouse**		x	
			Storage Shed	AR1	x	
			Storage Shed	AR2	x	
			Railroad Car	AR3	x	
			Railroad Car	AR4	x	
			Cargo Container	AR5	x	
			Refrigerator	AR6	x	
			Semi-Trailer	AR7	x	
			Semi-Trailer	AR8	x	
			Semi-Trailer	AR9	x	
			Trailer	AR10	x	
			Pump	AR11	x	
			Cargo Container Office	AR12	x	
			Cargo Container Building	AR13	x	
			Electronics/Communications Cellar	AR14	x	
			Portable Building	AR15	x	

Properties with blue shading denote a primary resource recorded on a resource form (ARA or IMACS). Accessory resources to the primary are listed below the primary resource.

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
			Semi-Trailer	AR16	x	
			Semi-Trailer	AR17	x	
			Semi-Trailer	AR18	x	
			Portable Building	AR19	x	
II	**B15220**	**23-154**	**Shop/Warehouse**		x	
II	**B15221**	**23-156**	**Warehouse**		x	
			Lab Trailer	AR1	x	
			Lab Trailer	AR2	x	
II	**B15222**	**23-157**	**Warehouse/Linen Storage**		x	
			Boxcar	AR1	x	
			Boxcar	AR2	x	
II	**B15223**	**23-158**	**USGS Warehouse**		x	
II	**B15224**	**23-775**	**Warehouses (includes 23-776 and 23-777)**		x	
			Warehouse Foundation	AR1	x	
			Foundation	AR2	x	
			Incinerator	AR3	x	
			Propane Tank	AR4	x	
			Loading Ramp	AR5	x	
			Concrete Slab	AR6		x
			Utility Cellar	AR7	x	
			Filling Station	AR8	x	
			Foundation	AR9	x	
			Foundation	AR10	x	
			Cargo Container Building	AR11	x	
			Cargo Container Building	AR12	x	
			Cargo Container Building	AR13	x	
II	**B15225**	**23-W7**	**Warehouse**		x	
			Storage Building	AR1	x	
II	**B15226**	**23-W8**	**Warehouse**		x	
			Transformer	AR1	x	
II	**B15227**	**23-W9**	**Warehouse**		x	
			Portable Building	AR1	x	
II	**B15228**	**23-W10**	**Warehouse**		x	
I	**B15229**	**23-190**	**Materials Testing Laboratory**		x	
			Sample Bins	AR1	x	
			Portable Building	AR2	x	
I	**B15230**	**23-116**	**Power Plant**		x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
			Equipment Foundations	AR1	x	
			Substation	AR2	x	
I	B15231	23-310	**Records Library**		x	
I	B15232	23-300	**Cafeteria**		x	
I	B15233	23-301	**Refrigerated Food Storage**		x	
II	B15234	23-754	**Cafeteria Boiler Building**		x	
			Electrical Boxes	AR1	x	
I	B15235	23-109	**Fire Station/ Maintenance/Housing Office**		x	
			Concrete Pad	AR1	x	
I	B15236	23-113	**Recreation Center**		x	
II	B15237	23-132	**REECo Cashier**		x	
			Tank or Bin Foundation	AR1	x	
			Sidewalk	AR2	x	
I	B15238	23-114	**Food Storage**		x	
			Storage Container	AR1	x	
			Storage Container	AR2	x	
M	B15239	23-B	**Dormitory**		x	
M	B15240	23-C	**Dormitory**		x	
M	B15241	23-D	**Dormitory**		x	
I	B15242	23-425	**Fire Station**		x	
II	B15243	23-475	**Dormitory**		x	
II	B15244	23-476	**Dormitory**		x	
II	B15245	23-477	**Day Room for Dormitory Complex 23-475 through 23-479**		x	
			Hot Water System	AR1	x	
II	B15246	23-478	**Dormitory**		x	
II	B15247	23-479	**Dormitory**		x	
II	B15248	23-480	**Dormitory**		x	
II	B15249	23-481	**Dormitory**		x	
II	B15250	23-482	**Day Room for Dormitory Complex 23-480 - 23-484**		x	
II	B15251	23-483	**Dormitory**		x	
II	B15252	23-484	**Dormitory**		x	
I	B15253	23-725	**Bell Telephone Computer**		x	
I	B15254	23-726	**Print Plant/Radio Communications**		x	
			Communications Tower	AR1	x	
			Communications Tower	AR2	x	
			Communications Tower	AR3	x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
			Communications Tower	AR4	x	
			Portable Communications Building	AR5	x	
			Portable Communications Building	AR6	x	
			Dish Antenna	AR7	x	
			Dish Antenna	AR8	x	
			Dish Antenna	AR9	x	
			Electrical Boxes and Utility Pole	AR10	x	
			Flammable Materials Lockers	AR11	x	
			Trailer	AR12	x	
			Posts	AR13	x	
I	**B15255**	**23-111**	**Security/Administration Building**		x	
			Flagpole	AR1		x
			Mechanical Area	AR2	x	
I	**B15256**	**23-117**	**Administration Building**		x	
			Mechanical Building	AR1	x	
			HVAC Unit	AR2	x	
			Transformer	AR3	x	
I	**B15257**	**23-118**	**Cable Testing Building**		x	
I	**B15258**	**23-143**	**Administration**		x	
I	**B15259**	**23-525**	**Weather Service/Post Office**		x	
I	**B15260**	**23-614**	**Photographic Support**		x	
			Pergola	AR1	x	
II	**B15261**	**23-526**	**Dormitory**		x	
			Storage Container	AR1	x	
			Electrical Box	AR2	x	
II	**B15262**	**23-527**	**Dormitory**		x	
			Electrical Box	AR1	x	
II	**B15263**	**23-529**	**Dormitory**		x	
			Electrical Box	AR1	x	
II	**B15264**	**23-531**	**Dormitory**		x	
II	**B15265**	**23-532**	**Dormitory**		x	
M	**B15266**	**23-535**	**Dormitory**		x	
			Pergola	AR1	x	
M	**B15267**	**23-536**	**Mechanical Building for Dormitory Complex 23-531, 532, and 535**		x	
I	**B15268**	**23-550**	**Chapel**		x	
			Portable Building	AR1	x	
			Canopy	AR2	x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
II	**B15269**	**23-528**	**Dormitory**		x	
			Transformer	AR1	x	
II	**B15270**	**23-530**	**Dormitory**		x	
			Gazebo	AR1	x	
			Transformer	AR2	x	
II	**B15271**	**23-153**	**Physical Standards/Calibration**		x	
			Shed	AR1	x	
			Modular Building	AR2		x
I	**B15272**	**23-750**	**Vehicle Maintenance Shop**		x	
			Substation	AR1	x	
			Used Oil Tank	AR2	x	
			Used Fuel and Liquids Storage	AR3	x	
			New Oil Tank	AR4	x	
I	**B15273**	**23-751**	**Equipment Maintenance Shop**		x	
			Substation	AR1	x	
			Railroad Car	AR2	x	
			Propane Enclosure	AR3	x	
			Containment Basin	AR4	x	
			Portable Building	AR5	x	
I	**B15274**	**23-752**	**Motor Pool Fleet Operations**		x	
			Fuel Tanks	AR1	x	
			Substation	AR2	x	
			GPR Training Facility	AR3		x
			Wash Platform	AR4	x	
			Propane and Underground Tanks	AR5	x	
			Shed	AR6	x	
			Loading Ramp	AR7	x	
			Trailer Parking	AR8	x	
			NDT Test Pad	AR9	x	
II	**B15275**	**23-753**	**Boiler Building**		x	
			Buried Tanks	AR1	x	
I	**B15276**	**23-700**	**Maintenance Shop**		x	
			Substation	AR1	x	
I	**B15277**	**23-701**	**LASL Radiation Laboratory**		x	
			Hot Water Heating Valves	AR1	x	
I	**B15278**	**23-702**	**Foil Handling**		x	
I	**B15279**	**23-703**	**Weather Maintenance/Dosimetry Lab**		x	
			Trailer Hookups	AR1	x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
I	**B15280**	**23-710**	**Crafts Building**		x	
			Shop	23-133	x	
			Refrigerator	AR1	x	
			Heliport	AR2	x	
			Substation	AR3	x	
			Gas Storage	AR4	x	
			Railroad Car Storage Building	AR5	x	
			Railroad Car Storage Building	AR6	x	
			Railroad Car Storage Building	AR7	x	
			Railroad Car Storage Building	AR8	x	
			Railroad Car Storage Building	AR9	x	
			Railroad Car Storage Building	AR10	x	
			Cargo Container Building	AR11	x	
			Cargo Container Building	AR12	x	
			Cargo Container Building	AR13	x	
			Portable Building	AR14	x	
			Sign Stockpile	AR15	x	
I	**B15281**	**23-600**	**LRL Laboratory**		x	
			Garage	AR1	x	
			Overhead Shelter	AR2	x	
			Substation	AR3	x	
			Substation	AR4	x	
			Overhead Shelter	AR5	x	
			Overhead Shelter	AR6		x
I	**B15282**	**23-610**	**Dosimetry Calibration Laboratory**		x	
			Enclosure	AR1	x	
I	**B15283**	**23-620**	**LASL J-3 Office**		x	
I	**B15284**	**23-630**	**Sandia Administration**		x	
I	**B15285**	**23-650**	**Health, Medicine, and Safety**		x	
			Ambulance Garage	AR1	x	
			Evacuation Assembly Area	AR2	x	
			Communications Tower	AR3	x	
I	**B15286**	**23-652**	**Industrial Hygiene**		x	
			Storage Shed	AR1	x	
			Substation	AR2	x	
II	**B15287**	**23-675**	**Dormitory**		x	
			Electrical Box	AR1	x	
II	**B15288**	**23-676**	**Dormitory**		x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
II	**B15289**	**23-677**	**Day Room**		x	
			Utility Box	AR1	x	
II	**B15290**	**23-678**	**Dormitory**		x	
II	**B15291**	**23-679**	**Dormitory**		x	
II	**B15292**	**23-680**	**Dormitory**		x	
II	**B15293**	**23-681**	**Dormitory**		x	
II	**B15294**	**23-682**	**Day Room**		x	
			Utility Box	AR1	x	
II	**B15295**	**23-683**	**Dormitory**		x	
II	**B15296**	**23-684**	**Dormitory**		x	
II	**B15297**	**23-211**	**DOD Warehouse**		x	
			Shop	AR1	x	
			Loading Dock	AR2	x	
			Basketball Court	AR3	x	
			Foundation	AR4	x	
			Portable Building	AR5	x	
			Portable Building	AR6	x	
Unevaluated[1.]	**B15298**	**23-1100**	**Information Not Available**		x	
Unevaluated[1.]	**B15299**	**23-1101**	**Information Not Available**		x	
Unevaluated[1.]	**B15300**	**23-1103**	**Information Not Available**		x	
			Transformer	AR1	x	
			Transformer	AR2	x	
Unevaluated[1.]	**B15301**	**23-1104**	**Lowery Complex Information Not Available**		x	
			Rappel Wall	AR1		x
			Portable Building	AR2	x	
Unevaluated[1.]	**B15302**	**23-1000**	**Information Not Available**		x	
			Electrical Boxes	AR1	x	
			Generator	AR2	x	
I	**B15303**	**23-1001**	**Security Administration Office**		x	
I	**B15304**	**23-1002**	**Security Office**		x	
			Enclosure	AR1	x	
I	**B15305**	**23-1010**	**Switching Station**		x	
			Switching Towers	AR1	x	
			Electrical Box	AR2	x	
I	**B15306**	**23-1014**	**Vehicle Scales**		x	
			Scale	AR1	x	
III	**C292**	**M19**	**Unknown Building Foundations**		x	
			Loading Dock	AR1	x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
			Equipment Foundation	AR2	x	
			Equipment Foundation	AR3	x	
			Equipment Foundation	AR4	x	
			Electrical Boxes	AR5	x	
			Slab Foundation	AR6	x	
III	**C293**	**23-W1**	**Foundations for Warehouses W1-W6, etc.**		x	
			Warehouse Foundation	23-W1	x	
			Warehouse Foundation	23-W2	x	
			Warehouse Foundation	23-W3	x	
			Warehouse Foundation	23-W3A	x	
			Warehouse Foundation	23-W4	x	
			Warehouse Foundation	23-W4A	x	
			Warehouse Foundation	23-W5	x	
			Warehouse Foundation	23-W5A	x	
			Warehouse Foundation	23-W6	x	
			Storage Building	23-119	x	
			Vehicle Maintenance Shop Foundation	23-140	x	
			Loading Ramp	AR1	x	
			Substation	AR2	x	
			Loading Dock	AR3	x	
			Scales	AR4	x	
			Foundation	AR5	x	
			Foundation	AR6	x	
			Foundation	AR7	x	
			Foundation	AR8	x	
			Gas Station	AR9	x	
			Pressure Testing Device	AR10	x	
			Substation	AR11	x	
IV	**C294**	**M22**	**Trailer Park**			x
			Foundations	AR1		x
			Electrical Panel	AR2		x
			Electrical Panel	AR3		x
			Standpipe	AR4		x
III	**C295**	**23-146**	**Foundations for Wash House and Dormitory Complex 23-501 - 508 and 23-513 - 515**		x	
			Dormitory Foundation	23-501	x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
			Dormitory Foundation	23-502	x	
			Dormitory Foundation	23-503	x	
			Dormitory Foundation	23-504	x	
			Dormitory Foundation	23-505	x	
			Dormitory Foundation	23-506	x	
			Dormitory Foundation	23-507	x	
			Dormitory Foundation	23-508	x	
			Dormitory Foundation	23-513	x	
			Dormitory Foundation	23-514	x	
			Dormitory Foundation	23-515	x	
III	**C296**	**M13**	**Parking**		x	
M	**C297**	**23-103**	**Women's Dormitory Complex Foundations 23-103 - 107; 23-152 Laundry**		x	
M			Foundation	23-104	x	
M			Foundation	23-105	x	
M			Foundation	23-106	x	
M			Foundation	23-107	x	
M			Wash House	23-152	x	
M	**C298**	**23-E**	**Dormitory Foundations (includes 23-E - M; 23-S - U)**		x	
M			Dormitory Foundation	23-F	x	
M			Dormitory Foundation	23-G	x	
M			Dormitory Foundation	23-H	x	
M			Dormitory Foundation	23-I	x	
M			Dormitory Foundation	23-J	x	
M			Dormitory Foundation	23-K	x	
M			Dormitory Foundation	23-L	x	
M			Dormitory Foundation	23-M	x	
M			Dormitory Foundation	23-S	x	
M			Dormitory Foundation	23-T	x	
M			Dormitory Foundation	23-U	x	
III	**C299**	**23-1**	**Dormitory Complex Foundations (23-1 - 23; 23-26 - 28; 23-31 - 36)**		x	
			Plaza with central flag pole	AR1	x	
			Quonset Hut Foundations 23-2 to 23-23 and 23-26 to 23-28	AR2 to AR26	x	
			Quonset Hut Foundations 23-31 to 23-36	AR27 to AR36	x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
M	**C300**	**M10**	**Dell Frenzi Park**		x	
M			Tennis/Basketball Court	AR1	x	
M			Picnic Area	AR2	x	
M			Ball Field	AR3		x
III	**C301**	**M12**	**Bus Parking**		x	
			Commuter Waiting Area	AR1	x	
III	**C302**	**M11**	**Men's Trailer Park Terraces**		x	
			Foundation	AR1		x
I	**C303**	**M21**	**Electrical/Communications Storage**		x	
			Equipment Cluster	AR1	x	
			Equipment Cluster	AR2	x	
			Portable Tank	AR3	x	
			Cable Reel Unit	AR4	x	
III	**C304**	**M20**	**Storage Yard**		x	
			Trailer	AR1	x	
			Portable Tower	AR2	x	
I	**C305**	**M9**	**Mercury Track**		x	
			Shed	AR1	x	
III	**C306**	**23-24**	**Foundations for Quonset Huts (23-24/25/29/30)**		x	
			Foundation 23-25	AR1	x	
			Foundation 23-29	AR2	x	
			Foundation 23-30	AR3	x	
III	**C307**	**23-210**	**DOD Motor Pool Maintenance Foundation**		x	
			Filling Station	AR1	x	
			Dispatch	AR2	x	
			Entry Landscaping	AR3	x	
I	**C308**	**M16**	**Tree Target Remnants**		x	
III	**C309**	**23-213**	**Biomedical Effects, Mouse House (23-214) and Other Foundations**		x	
			Radiological Laboratory	23-214	x	
			Power Pole	AR1	x	
			Terrace	AR2	x	
			Concrete Slab	AR3	x	
			Concrete Slabs	AR4	x	
			Concrete Slab Building Foundation	AR5	x	
			Concrete Slab Building Foundation	AR6	x	
			Tank Foundation	AR7	x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
			Concrete Slab Building Foundation	AR8	x	
			Loading Ramp	AR9	x	
			Terrace	AR10	x	
III	**C310**	**23-1200**	**Sewage Disposal Plant**		x	
			Screen and Comminutor	AR1	x	
			Imhoff Tank	AR2	x	
			Filter	AR3	x	
			Settling Tank	AR4	x	
			Sludge Beds	AR5	x	
			Loading Platform	AR6	x	
			Electrical Panel	AR7	x	
			Utility Cellar	AR8	x	
III	**C311**	**M29**	**Salvage Yard**		x	
			Storage Building	AR1	x	
			Portable Building Foundation	AR2	x	
			Portable Building Terrace	AR3	x	
			Utility Pole	AR4	x	
			Utility Pole	AR5	x	
			Loading Dock	AR6	x	
			Stickers	AR7	x	
			Weights	AR8	x	
III	**C312**	**23-790**	**CETO Foundation**		x	
			CETO Greenhouse Foundation	AR1	x	
			Storage	AR2	x	
			Storage	AR3	x	
			Propane Tank Enclosure	AR4	x	
			Substation	AR5	x	
III	**C313**	**23-170**	**Ice Plant Foundation**		x	
			Semi-Trailer	AR1	x	
III	**C314**	**23-120**	**Office Foundations (23-120, 121, 122, and 123)**		x	
III	**C315**	**M14**	**Mercury Substation Foundations**		x	
III	**C316**	**23-110**	**Cafeteria/Engineering Office Foundation**		x	
III	**C317**	**23-112**	**Cafeteria/Office Foundation**		x	
III	**C318**	**23-115**	**Boiler Building Foundation**		x	
M	**C319**	**23-100**	**Hospital, Sheriff's Office Foundation**		x	
M	**C320**	**23-101**	**Administration Building Foundation**		x	
M	**C321**	**23-125**	**Theater Foundation**		x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
M	**C322**	**23-127**	**Weather Service Foundation**		x	
M	**C323**	**23-102**	**Administration Building Foundation**		x	
M	**C324**	**23-A**	**Dormitory Foundation**		x	
II	**C325**	**23-155**	**RAD-SAFE Foundation**		x	
			Transformer	AR1	x	
III	**C326**	**M28**	**Unknown Building Foundation**		x	
III	**C327**	**23-800**	**Disposal Entrance Foundation (includes 23-801 and 23-810A)**		x	
			Building Foundation	23-801	x	
			Portable Building 810A	AR1	x	
			Concrete Slab	AR2		x
II	**S1707**		**Power and Communications**			
IV	**S1745**	**M7**	**Siren Tower**			x
I	**S1746**	**23-756**	**Car Wash**		x	
			Vacuum	AR1	x	
			Slab	AR2	x	
III	**S1747**	**M15**	**Liaison Airstrip**		x	
III	**S1748**	**M8**	**Helicopter Landing Pad**		x	
I	**S1749**	**M27**	**Ham Radio Facility**		x	
			Aerial Pole	AR1	x	
			Aerial Pole	AR2	x	
			Aerial Pole	AR3	x	
			Aerial Pole	AR4	x	
			Pole	AR5	x	
I	**S1750**	**23-134**	**Bottled Gas Storage (includes 23-135)**		x	
			Trailer	AR1	x	
			Trailer	AR2	x	
II	**S1751**	**M24**	**100,000 Gallon Water Tank #993491**		x	
II	**S1752**	**M25**	**250,000 Gallon Water Tank #701008**		x	
II	**S1753**	**M26**	**1.5 Million Gallon Water Tank #700852**		x	
			Cellar	AR1	x	
III	**S1754**	**M17**	**Flagpole**		x	
I	**S1755**	**M18**	**Communications Tower**		x	
III	**S1756**	**M31**	**Upper Sewage Lagoons**		x	
			Shed	AR1		x
			Shed	AR2		x
III	**S1757**	**M32**	**Lower Sewage Lagoons**		x	
I	**S1758**	**23-GS100**	**Main Gate**		x	

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
			Portable Building	AR1	x	
III	**S1759**	**M23**	**Gate 100 Sewage Lagoon**		x	
III	**S1760**	**M1**	**Mercury Highway**		x	
			Mercury Bypass	AR1	x	
III	**S1761**	**M2**	**Jackass Flats Road**		x	
			Abandoned Jackass Flats Highway Shortcut	AR1	x	
III	**S1762**	**M3**	**Mercury Street System**		x	
M	**S1763**	**M4**	**Mercury Water System**		x	
M	**S1764**	**M5**	**Mercury Sewer System**		x	
III	**S1765**	**M6**	**Mercury Stormwater Drainage System**		x	
			Airport Ditch	AR1	x	
			Bypass Ditch	AR2	x	
			Central Mercury Highway Ditch	AR3	x	
			Del Frenzi Ditch	AR4	x	
			DNA Ditch	AR5	x	
			Firing Range Ditch	AR6	x	
			Gas Ditch	AR7	x	
			Jackass Flats Hwy. Ditch	AR8	x	
			Jangle Ditch	AR9	x	
			Knothole Ditch	AR10	x	
			Lagoon Ditch	AR11	x	
			North Ditch	AR12	x	
			North Mercury Highway Ditch	AR13	x	
			Salvage Ditch	AR14	x	
			South Jackass Flats Rd. Ditch	AR15	x	
			South Mercury Hwy. Ditch	AR16	x	
			Substation Ditch	AR17	x	
			Track Ditch	AR18	x	
			Trinity Ditch	AR19	x	
			Warehouse Ditch	AR20	x	
			Water Tanks Ditch	AR21	x	
M	**S1766**	**M30**	**Mercury Steam/HTHW System**		x	
III	**S1794**	**M33**	**Tap & Meter Substation Foundations**		x	
IV		**23-151**	**Core Storage**			x
IV		**23-163**	**Counterterrorism Training Complex**			x
IV		**23-23**	**Nye County Sheriff Trailer**			x
IV		**23-302**	**Mercury Garbage Facility**			x
IV		**23-426**	**Fire Station #1 Dormitory**			x

Table C-1. Property Categories for Elements in the Mercury Historic District.

PROPERTY CATEGORY	SHPO #	NNSS or Other #	NAME (HISTORIC)	AR	ELIGIBILITY CRITERIA A & C	
					Contributing	Non-Contributing
IV		23-640	Fire Station #1			x
IV		23-699	Fire Department Warehouse			x
IV			Bulk Fuel Station			x
IV		23-1106	CNV Classroom Annex			x

Footnote:

1. The unevaluated property category applies to sensitive resources. For these, limited information is available for public release. The Architectural Resource Assessment forms do not include photographs and full descriptions. Unevaluated resources will be mitigated as Category I.

APPENDIX D: Plan for Photography

For photography of most elements in the MHD, high-quality digital images are acceptable. Such images will conform to the Best Practices guidelines in the National Park Service National Register Photo Policy Fact Sheet (https://www.nps.gov/nr/publications/guidance/photo_policy_final.pdf) and Section 4.1 of the National Archives Bulletin 2014-04 Revised Format Guidelines for the Transfer of Permanent Electronic Records.

Certain Category I historic properties represent a unique or outstanding example of architecture or engineering that makes a highly significant contribution to the historic character of the MHD. For these specific historic properties, a Historic American Building Survey/Historic American Engineering Record (HABS/HAER) submission may be warranted. Large format black-and-white film images will be taken that conform to the National Park Service HABS/HAER Standards and Guidelines (https://www.nps.gov/hdp/standards/index.htm) will be used in place of digital photography in these cases.

Photographic Coverage

Photographs should be clear, well composed, and provide an accurate visual representation of the element and its significant features. They must illustrate the qualities discussed in the description and statement of significance on the ARA form. Photographs should show historically significant features and any alterations that have affected the element's historic integrity.

The necessary number of photographic views depends on the size and complexity of the element. Submit as many photographs as needed to depict the current condition and significant features of the element. A few photographs may be sufficient to document a single building or object. Larger, more complex elements will require a greater number of photos. Prints of historic photographs may supplement documentation and be particularly useful in illustrating changes that have occurred over time.

For buildings and structures, exterior images should be taken from multiple points and directions to adequately capture the extant design, historically significant functions, and current condition of the building or structure as a whole. Images should show the principal facades and the setting in which the property is located. Additions, alterations, intrusions, and dependencies should also appear in the photographs. Include views of interiors, outbuildings, landscaping, or unusual features if they contribute to the significance of the element. For dependent resources, images will be taken to illustrate the relationship of the dependent structure to the main building or structure.

For photos of the MHD generally, show major building types and styles, pivotal buildings and structures, and representative noncontributing resources. Streetscapes and landscapes are recommended. Aerial views may also be useful. Views of significant topographic features and spatial elements should also be submitted. Views of individual buildings are not necessary if streetscape views clearly illustrate the significant historical and architectural qualities of the district. Each image should be keyed to an MHD map to indicate where and in what direction it was taken.

Digital Photographs

Digital photos will be six megapixel (2000 x 3000 pixel image) or greater, preferably greater. Image file format should be Tag Image File format (TIFF) or RAW format images. RGB color digital TIFFs are preferred. JPEGs converted to TIFFs by a computer conversion process are acceptable; however, JPEGs must not be altered in any way prior to conversion (other than renaming them). Do not use the JPEG setting on the camera if a higher quality setting is available.

Photo Files and Prints

Digital photo files will be labeled following standard labeling format (NV_Nye County_Mercury_resource name_0001, etc.). Copies of the digital files will be maintained on archival quality read-only CDs or DVDs AND on dedicated flash drives. Label CD/DVDs using permanent labeling media directly on the CD/DVD label surface, or handwritten in permanent ink (e.g., Sharpie), NOT using adhesive labels. Label flash drives using permanent ink AND in a text file on the drive.

Digital photo files will be used to make archival quality photographic prints as hardcopy backups. Photographic prints should be printed at 300 dpi or greater, preferably greater. Every print must be labeled on the white margin around the print or on the back of the print (not on the image!) using an archival photo-labeling pen or soft lead pencil. These hardcopy prints will be archived along with digital photo files at the Department of Energy Nuclear Testing Archive in Las Vegas.