APPENDIX G

Record of Consultation with American Indian Tribes
May 2, 2022

Mr. Stephen R. Adkins, Chief
Chickahominy Tribe
8200 Lott Cary Road
Providence Forge, VA 23140

Mr. Gerald Stewart, Chief
Chickahominy Tribe
2895 Mount Pleasant Road
Providence Forge, VA 23140

SUBJECT: Initiation of Section 106 Consultation
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in National Capital Region, Greater Washington, D.C. and Richmond, Virginia

Dear Chief Adkins and Chief Stewart,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

Project Location
Five geographical testing areas are being considered including two areas of interest to the Chickahominy Tribe, the area encompassing the National Capital Region, Greater Washington, D.C. and the area encompassing Richmond, Virginia (VA). Maps of these areas are included as Attachments 1 and 2.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) Unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.
All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic areas to include in the APEs. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. The National Capital Region/Greater Washington D.C. area APE (Attachment 1) contains 580 NRHP-listed properties and 81 historic districts. Chesterfield, Goochland, Hanover, and Henrico counties in the Richmond, VA APE (Attachment 2) contain 167 NRHP-listed properties and 19 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**

Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachments 1 and 2 – C-UAS Test Areas
May 2, 2022

Mr. Robert Gray, Chief
Pamunkey Tribe
1054 Pocahontas Trail
King William, VA 23086

SUBJECT: Initiation of Section 106 Consultation

Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in National Capital Region, Greater Washington, D.C. and Richmond, Virginia

Dear Chief Gray,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

**Project Location**

Five geographical testing areas are being considered including two areas of interest to the Pamunkey Tribe, the area encompassing the National Capital Region, Greater Washington, D.C. and the area encompassing Richmond, Virginia (VA). Maps of these areas are included as Attachments 1 and 2.

**Description of Undertaking**

DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) Unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or take over actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.
DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**
Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic areas to include in the APEs. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**
A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. The National Capital Region/Greater Washington D.C. area APE (Attachment 1) contains 580 NRHP-listed properties and 81 historic districts. Chesterfield, Goochland, Hanover, and Henrico counties in the Richmond, VA APE (Attachment 2) contain 167 NRHP-listed properties and 19 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**
Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachments 1 and 2 – C-UAS Test Area
May 2, 2022

Mr. William Fisher, Chief and Mr. William Tarrant, Tribal Historic Preservation Officer (THPO)
Seneca Cayuga Nation
PO Box 453220
Grove, OK 74345-3220

SUBJECT: Initiation of Section 106 Consultation

Dear Chief Fisher and THPO Tarrant,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Office.

**Project Location**

Five geographical testing areas are being considered, including three geographical areas which are of interest to the Seneca Cayuga Nation. These areas are Niagara Falls and Buffalo, New York (NY), Greater Philadelphia, Pennsylvania (PA), and the National Capital Region, Greater Washington, D.C. area. Maps of these areas are included as Attachments 1-3.

**Description of Undertaking**

DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.
All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in the U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**
Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic areas to include in the APEs. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**
A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. The APE for Niagara and Erie counties in NY (Attachment 1) contains 185 NRHP-eligible or NRHP-listed architectural or archaeological resources and 53 historic districts. The APE for Chester, Delaware, Montgomery, Philadelphia, and Bucks counties in PA (Attachment 2) contains 658 NRHP-listed properties and 253 historic districts. The APE for the National Capital Region/Greater Washington D.C. area (Attachment 3) contains 580 NRHP-listed properties and 81 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**
Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology
Attachment 2 – Proposed Action – Greater Philadelphia, PA C-UAS Test Area
Attachment 3 – Proposed Action – National Capital Region, Greater Washington, D.C. C-UAS Test Area
May 2, 2022

Mr. Rickey Armstrong, Sr., President
Seneca Nation of Indians
90 Ohí:yo’ Way
Salamanca, NY 14779

Mr. Joe Stahlman, Seneca-Iroquois National Museum Director/Tribal Historic Preservation Officer (THPO)
Seneca Nation of Indians
82 W. Hetzel St.
Salamanca, NY 14779

SUBJECT: Initiation of Section 106 Consultation
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Niagara Falls and Buffalo, New York

Dear President Armstrong and Director/THPO Stahlman,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Office.

Project Location
Five geographical testing areas are being considered including an area encompassing Niagara Falls and Buffalo, New York. A map of the area is included as Attachment 1.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.
All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in the U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**
Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed location of test events and the area where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there is no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**
A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APE. There are 185 NRHP-eligible or NRHP-listed architectural or archaeological resources within the APE. Niagara and Erie counties contain 53 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**
Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology
Attachment 1 – Proposed Action - Niagara Falls and Buffalo, NY C-UAS Test Area
May 2, 2022

Mr. Roger Hill, Chief
Tonawanda Band of Seneca
7027 Meadville Road
Basom, NY 14013

SUBJECT: Initiation of Section 106 Consultation
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Niagara Falls and Buffalo, New York

Dear Chief Hill,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Office.

Project Location
Five geographical testing areas are being considered including an area encompassing Niagara Falls and Buffalo, New York. A map of the area is included as Attachment 1.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

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DHS S&T would comply with all requirements for sUAS operations outlined in the U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification
of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed location of test events and the area where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there is no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

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Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

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Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.

Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology
Attachment 1 – Proposed Action - Niagara Falls and Buffalo, NY C-UAS Test Area
May 2, 2022

Mr. Leo Henry, Chief
Tuscarora Nation
2006 Mt Hope Rd.
Lewiston, NY 14092

Mr. Bryan Printup, Representative
Tuscarora Nation
5226 Walmore Rd.
Lewiston, NY 14092

SUBJECT: Initiation of Section 106 Consultation

Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Niagara Falls and Buffalo, New York and Northeastern West Virginia

Dear Chief Henry and Representative Printup,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

Project Location

Five geographical testing areas are being considered including areas encompassing Niagara Falls and Buffalo, New York and Northeastern West Virginia (WV). Maps of these areas are included as Attachments 1 and 2.

Description of Undertaking

DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for
fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

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**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic areas to include in the APEs. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. There are 185 NRHP-eligible or NRHP-listed architectural or archaeological resources and 53 historic districts within the Niagara and Erie counties APE (Attachment 1). Berkeley and Jefferson counties in the WV APE (Attachment 2) contain 14 NRHP-listed properties 50 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

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Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology
May 2, 2022

Mr. John Johnson, Governor and Mr. Devon Frazier, Tribal Historic Preservation Officer (THPO)  
Absentee-Shawnee Tribe of Indians of Oklahoma  
2025 South Gordon Cooper Drive  
Shawnee, OK 74801

SUBJECT: Initiation of Section 106 Consultation  
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Greater Philadelphia, Pennsylvania

Dear Governor Johnson and THPO Frazier,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Office.

**Project Location**  
Five geographical testing areas are being considered including an area encompassing Greater Philadelphia, Pennsylvania (PA). A map of the area is included as Attachment 1.

**Description of Undertaking**  
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA
Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed location of test events and the area where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there is no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APE. The test area contains 658 NRHP-listed properties. Chester, Delaware, Montgomery, Philadelphia, and Bucks counties contain 253 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**

Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.

Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachment 1 – C-UAS Test Area
Attachment 1 – Proposed Action – Greater Philadelphia, PA C-UAS Test Area
May 2, 2022

Ms. Deborah Dotson, President
Ms. Nekole Alligood, Director of Cultural Resources & Section 106 Review
Delaware Nation of Oklahoma
PO Box 825
Anadarko, OK 73005

SUBJECT: Initiation of Section 106 Consultation

Dear President Dotson and Director Alligood,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

Project Location
Five geographical testing areas are being considered including four geographical areas which are of interest to the Delaware Nation of Oklahoma. These areas are Greater Philadelphia, Pennsylvania (PA), Northeastern West Virginia (WV), the National Capital Region, Greater Washington, D.C., and Richmond, Virginia (VA). Maps of these areas are included as Attachments 1-4.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.
All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic areas to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. The APE for Chester, Delaware, Montgomery, Philadelphia, and Bucks counties in the PA APE (Attachment 1) contains 658 NRHP-listed properties and 253 historic districts. Berkeley and Jefferson counties in the WV APE (Attachment 2) contain 14 NRHP-listed properties and 50 historic districts. The National Capital Region/Greater Washington D.C. area APE (Attachment 3) contains 580 NRHP-listed properties and 81 historic districts. Chesterfield, Goochland, Hanover, and Henrico counties in the Richmond, VA APE (Attachment 4) contain 167 NRHP-listed properties and 19 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**

Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachments 1-4 – C-UAS Test Areas
Attachment 1 – Proposed Action – Greater Philadelphia, PA C-UAS Test Area
Attachment 2 – Proposed Action – Northeastern WV C-UAS Test Area
May 2, 2022

Mr. Chester "Chet" Brooks, Chief
Delaware Tribe of Indians
5100 Tuxedo Boulevard
Bartlesville, OK 74006

Ms. Susan Bacher, Preservation Representative (East Coast)
Delaware Tribe of Indians
PO Box 64
Pocono Lake, PA 18347

SUBJECT: Initiation of Section 106 Consultation

Dear Chief Brooks and Preservation Representative Bacher,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

Project Location

Five geographical testing areas are being considered including two areas of interest to the Delaware Tribe of Indians, an area encompassing Greater Philadelphia, Pennsylvania (PA) and the National Capital Region, Greater Washington, D.C. area. Maps of these areas are included as Attachments 1 and 2.

Description of Undertaking

DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.
All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic areas to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. Chester, Delaware, Montgomery, Philadelphia, and Bucks counties in the PA APE (Attachment 1) contain 658 NRHP-listed properties and 253 historic districts. The APE for the National Capital Region/Greater Washington D.C. area (Attachment 2) contains 580 NRHP-listed properties and 81 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**

Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachments 1 and 2 – C-UAS Test Areas
Attachment 1 – Proposed Action – Greater Philadelphia, PA, C-UAS Test Area
May 2, 2022

Ms. Glenna Wallace, Chief
Eastern Shawnee Tribe of Oklahoma
PO Box 350
Seneca, MO 64865

Mr. Brett Barnes, Tribal Historic Preservation Officer (THPO)
Eastern Shawnee Tribe of Oklahoma
12705 S. 705 Road
Wyandotte, OK

SUBJECT: Initiation of Section 106 Consultation

Dear Chief Wallace and THPO Barnes,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

Project Location
Five geographical testing areas are being considered including three areas of interest to the Eastern Shawnee Tribe of Oklahoma, Greater Philadelphia, Pennsylvania (PA), Northeastern West Virginia (WV), and the National Capital Region, Greater Washington, D.C area. Maps of these areas are included as Attachments 1-3.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for
fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. The Chester, Delaware, Montgomery, Philadelphia, and Bucks counties APE in PA (Attachment 1) contains 658 NRHP-listed properties and 253 historic districts. Berkeley and Jefferson counties in the Northeastern WV APE (Attachment 2) contain 14 NRHP-listed properties and 50 historic districts. The National Capital Region, Greater Washington, D.C APE (Attachment 3) contains 580 NRHP-listed properties and 81 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**

Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachments 1-3 – C-UAS Test Areas
Attachment 2 – Proposed Action – Northeastern WV C-UAS Test Area
Attachment 3 – Proposed Action – National Capital Region, Greater Washington, D.C. C-UAS Test Area
May 2, 2022

Mr. Benjamin Barnes, Chief, and Ms. Tonya Tipton, Tribal Historic Preservation Officer (THPO)
Shawnee Tribe
29 South Highway 69A
Miami, OK 74355

SUBJECT: Initiation of Section 106 Consultation
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Greater Philadelphia, Pennsylvania

Dear Chief Barnes and THPO Tipton,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Office.

Project Location
Five geographical testing areas are being considered including an area encompassing Greater Philadelphia, Pennsylvania (PA). A map of the area is included as Attachment 1.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotorcopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA
Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**
Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed location of test events and the area where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there is no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**
A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APE. The test area contains 658 NRHP-listed properties. Chester, Delaware, Montgomery, Philadelphia, and Bucks counties in PA contain 253 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**
Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.

Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachment 1 – C-UAS Test Area
May 2, 2022

Mr. Wally Miller, Chairman
Stockbridge Munsee Community, Wisconsin
N. 8476 Mo He Con Nuck Road
Bowler, WI 54416

Mr. Nathan Allison, Tribal Historic Preservation Officer (THPO)
Stockbridge Munsee Community, Wisconsin
65 1st Street
Troy, NY 12180

SUBJECT: Initiation of Section 106 Consultation
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Greater Philadelphia, Pennsylvania

Dear Chairman Miller and THPO Allison,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Office.

Project Location
Five geographical testing areas are being considered including an area encompassing Greater Philadelphia, Pennsylvania (PA). A map of the area is included as Attachment 1.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.
All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**
Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed location of test events and the area where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there is no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**
A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APE. The proposed PA APE (Attachment 1) contains 658 NRHP-listed properties. Chester, Delaware, Montgomery, Philadelphia, and Bucks counties in PA contain 253 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**
Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachment 1 – C-UAS Test Area
May 2, 2022

Mr. W. Frank Adams, Chief
Upper Mattaponi Tribe
PO Box 184
King William, VA 23086

SUBJECT: Initiation of Section 106 Consultation
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Richmond, Virginia

Dear Chief Adams,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Office.

Project Location
Five geographical testing areas are being considered including an area encompassing Richmond, Virginia (VA). A map is included as Attachment 1.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA
Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed location of test events and the area where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there is no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APE. Chesterfield, Goochland, Hanover, and Henrico counties in the Richmond, VA APE (Attachment 1) contain 19 historic districts and 167 NRHP-listed properties.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**

Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking would have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.

Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachment 1 – C-UAS Test Area
May 2, 2022

Mr. Bill Harris, Chief
Catawba Tribe
996 Avenue of the Nations
Rock Hill, SC 29730

Dr. Wenonah G. Haire, Catawba Cultural Center Executive Director and Tribal Historic Preservation Officer (THPO)
Catawba Tribe
1536 Tom Steven Road
Rock Hill, SC 29730

SUBJECT: Initiation of Section 106 Consultation

Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Northeastern West Virginia, National Capital Region, Greater Washington, D.C., and Richmond, Virginia.

Dear Chief Harris and Dr. Haire,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

Project Location

Five geographical testing areas are being considered including three areas of interest to the Catawba Tribe, Northeastern West Virginia (WV), National Capital Region, Greater Washington, D.C., and Richmond, Virginia (VA). Maps of these areas are included as Attachments 1-3.

Description of Undertaking

DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for
fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

All C-UAS test events would be conducted by DHS S&T-authorized personnel in conjunction with a participating Component or State partner and may be attended by other DHS Components and other government, state, or local agencies.

DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**

Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic areas to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**

A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. Berkeley and Jefferson counties in the WV APE (Attachment 1) contain 14 NRHP-listed properties and 50 historic districts. The APE for the National Capital Region/Greater Washington D.C. area (Attachment 2) contains 580 NRHP-listed properties and 81 historic districts. Chesterfield, Goochland, Hanover, and Henrico counties in the Richmond, VA APE (Attachment 3) contain 167 NRHP-listed properties and 19 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**

Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.
Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachments 1-3 – C-UAS Test Area
Attachment 1 – Proposed Action – Northeastern WV C-UAS Test Area
May 2, 2022

Mr. Kenneth Branham, Chief
Monacan Indian Nation
PO Box 960
Amherst, VA 24521

SUBJECT: Initiation of Section 106 Consultation
Notification of DHS S&T Proposed Undertaking to Evaluate Counter-Unmanned Aircraft Systems in Northeastern West Virginia and Richmond, Virginia

Dear Chief Branham,

The U.S. Department of Homeland Security (DHS) Science & Technology Directorate (S&T) plans to programmatically test available counter unmanned aircraft system (C-UAS) technologies to evaluate their effectiveness in a range of terrains and environments and has prepared a single comprehensive document in order to meet DHS mission requirements. Pursuant to Section 106 of the National Historic Preservation Act (NHPA) and its implementing regulations, 36 CFR Part 800, “Protection of Historic Properties (Section 106),” this letter is being transmitted to initiate consultation, to identify historic properties, and to assess potential adverse impacts pursuant to the undertaking. DHS has also initiated Section 106 consultation with the State Historic Preservation Offices.

Project Location
Five geographical testing areas are being considered including an area encompassing Northeastern West Virginia (WV) and another area encompassing Richmond, Virginia (VA). Maps of these areas are included as Attachments 1 and 2.

Description of Undertaking
DHS S&T is proposing to programmatically test C-UAS capabilities to detect, track, identify, and mitigate (DTI-M) unmanned aircraft systems (UAS). The proposed undertaking includes testing of five types of third-party C-UAS technology modalities to DTI-M small UAS (sUAS), which the U.S. Department of Defense (DoD) defines as fixed wing or rotocopter UAS having a maximum takeoff weight of less than 55 pounds. The C-UAS systems being tested would be mounted on a tripod, which could be placed on the ground or on a vehicle. The C-UAS systems would have a detection range of up to approximately 1.2 miles. The proposed undertaking evaluates five modalities (or types) of systems: (1) Radar; (2) Passive radiofrequency (RF) (sometimes referred to as electronic surveillance measures); (3) Active RF (used for fend or takeover actions when testing mitigation); (4) Electro-Optical/Infrared (EO/IR) cameras; and (5) Acoustic.

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DHS S&T would comply with all requirements for sUAS operations outlined in U.S. Department of Transportation, Federal Aviation Administration (FAA) Title 14 CFR, Part 107, Operation and Certification
of Small Unmanned Aircraft Systems. Additionally, DHS S&T C-UAS testing would operate with an FAA Certificate of Waiver or Authorization (COA) when flying in controlled airspace (Class A, Class B, Class C, Class D, and Class E airspace) and with additional coordination as needed (such as when flying in DoD-controlled airspace). As part of the proposed undertaking, DHS would obtain FAA COAs for testing activities that involve operations at or below 400 feet above ground level.

**Area of Potential Effect**
Per NHPA Sections § 800.4(a)(1) and § 800.16(d), DHS S&T has defined the Area of Potential Effect (APE) for the undertaking as the proposed locations of test events and the areas where sUAS would land and fly. Because all C-UAS testing activities would occur above ground, there are no below-ground geographic area to include in the APE. No indirect effects are anticipated.

**Identification and Evaluation of Historic Properties**
A historian meeting the Secretary of the Interior’s Professional Qualifications Standards for History and Architectural History consulted the National Register of Historic Places (NRHP) database, historic maps, aerial photos, and DHS S&T files for previous cultural resource reports and information on historic properties within the proposed undertaking APEs. Berkeley and Jefferson counties in the WV APE (Attachment 1) contain 14 NRHP-listed properties and 50 historic districts. Chesterfield, Goochland, Hanover, and Henrico counties in the Richmond, VA APE (Attachment 2) contain 167 NRHP-listed properties and 19 historic districts.

Each C-UAS would have a normal operational altitude of up to 400 feet above ground level to satisfy operational and FAA requirements. Noise, as perceived from the ground, is not expected to be significant at the operating flight altitude. Ground activities related to the proposed undertaking would be minimal and limited to DHS properties. The test areas are characterized by human-built environments consisting of structures, paved and concrete surfaces, and landscaped areas. Construction activities are not anticipated and are not part of the proposed undertaking.

**Finding of No Adverse Effect to Historic Properties**
Due to the measures incorporated into the proposed undertaking to avoid impacts to above-ground properties and the absence of mechanisms to impact archaeological sites, DHS S&T has determined that pursuant to 36 C.F.R. 800.5(b), the proposed undertaking will have No Adverse Effects to Historic Properties and is seeking your concurrence.

Your prompt attention to the request is greatly appreciated. If DHS S&T has not received a response from your office within 30 days of your receipt of this determination letter, DHS S&T will consider its responsibilities under Section 106 to have been fulfilled.

Thank you for your support of the DHS mission. Should you need additional information, please do not hesitate to contact me via email at CUAS-Test@hq.dhs.gov.

Sincerely,

Shawn McDonald
Program Manager
Mission & Capability Support
DHS, Science & Technology

Attachments 1 and 2 – C-UAS Test Areas
Attachment 1 – Proposed Action – Northeastern WV C-UAS Test Area