AFIT/GEE/CEM/92S-4

CULTURAL RESOURCES MANAGEMENT IN THE UNITED STATES AIR FORCE: DEVELOPMENT OF A PLANNING PRIMER

THESIS

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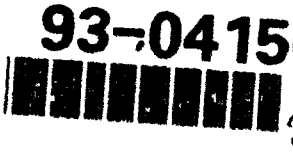

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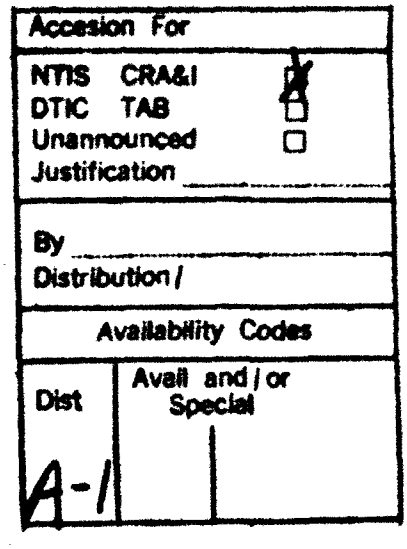

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CULTURAL RESOURCES MANAGEMENT IN THE UNITED STATES AIR FORCE: DEVELOPMENT OF A PLANNING PRIMER

THESIS

Presented to the Faculty of the School of Engineering

of the Air Force Institute of Technology

Air University

In Partial Fulfillment of the

Requirements for the Degree of

Master of Science in Engineering and Environmental Management

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September 1992

Preface

The purpose of this research was to produce a USAF base-level primer for use as a guide to requirements, standards, and procedures concerning the preservation of cultural resources. The specific concern which initiated this research is that Air Force personnel charged with cultural resources management are not being effectively trained; therefore, basic legal requirements may go unfulfilled. The immediate need for the product of this research was to condense, into a single document, the information needed by novice personnel charged with satisfying USAF cultural resource obligations.

Information for this study was drawn from several sources including, an exploratory research, specialized training, and interviews. An immense amount of information was examined and several of the issues continue to evolve. However, we feel we were successful in condensing several of the key issues of concern into a single document. The "Expert Panel" review supported our view of the success of the research. Several of the Expert Panel members suggested specific uses for the research product.

While conducting this research and writing this thesis, we had a great deal of help from others. We are greatly indebted to our faculty advisor, Capt M.K. Eisert, for her professional assistance and patience during this undertaking. We also wish to thank our committee member, Capt J.C. McDermon, for his assistance and collaboration during the actual development of the primer. A word of appreciation is also due to our Expert Panel, especially Dr. Jan Ferguson. Finally, we wish to thank our wives, Jackie and Liz, for their patience during those never ending nights of computer-work and printer discord.

Steven R. Becker and Russell R. Hula

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Abstract

The purpose of this study was to produce a USAF base-level primer for use as a guide to requirements, standards, and procedures concerning the preservation of cultural resources. Cultural resources include buildings, sites, districts, structures, and objects that have significant scientific, historic, or cultural value. The research had two major objectives: (1) Identify existing sources of cultural resource information through a review of legal requirements, regulations, USAF policy documents, and other sources such as data bases. (2) Produce a "cultural resources management primer" after identifying the appropriate characteristics of a primer. This product could then be used by novice personnel charged with satisfying USAF cultural resource obligations.

The study found that there is an immense amount of evolving information available concerning cultural resources. Information from an exploratory research, specialized training, and interviews was integrated into the document. The information compiled in the primer is a very small fraction of the knowledge that is needed to successfully manage a cultural resources program at an Air Force installation. The primer does, however, provide a starting point from which new personnel can gather the knowledge and skills to do the job.

The "Cultural Resources Management Primer," produced from this research, is a stand-alone document. Issues covered in the primer include an overview of cultural resources management, compliance requirements, management/planning processes, and references to technical data. Based upon an "Expert Panel" validation as a training tool, the authors recommend the primer be disseminated by USAF MAJCOMs and training courses.

CULTURAL RESOURCES MANAGEMENT IN THE UNITED STATES AIR FORCE: DEVELOPMENT OF A PLANNING PRIMER

I. Introduction

General Issue

Until recently, "historic preservation" was rarely a controversial issue in private and federal real estate development. Prior to the 1960s, support for historic preservation was limited to a few individuals. The renovation, restoration, and protection of our country's historic heritage were actions taken only when it made economic and functional sense. Societal awareness intensified during the 1960s as people started to question this premise. The American people realized that in many cases, irreplaceable cultural assets were disappearing forever (Lewis, 1986:180).

Congressional legislation has been enacted in reaction to this heightened awareness. With this legislation came several actions required of federal facilities. The Air Force, being a federal facility, is required to follow this legislation. The specific concern of this thesis is that Air Force personnel are not being effectively trained for the challenges of historic preservation; therefore, basic legal requirements may go unfulfilled (Neumann and others, 1991:8). Although AFR 126-7 and other government documents cover these laws and requirements, no single condensed information source contains the material needed by novice personnel charged with satisfying Air Force obligations.

Historic Preservation and Cultural Resources Defined

"The American preservation movement is nearly as old as the country itself . . ." (Hosmer, 1965:29). Historic preservation is defined in AFR 126-7 as the preservation of "historic resources of the Nation [which] include[s] buildings, sites, districts, structures, and objects that have significant scientific, historic, or cultural value" (Dept. USAF, 1987:1). Other sources of preservation information use the term "cultural resource" (Neumann and others, 1991:44; DOD, 1991:156). This term broadens the first definition. The Deputy Assistant Secretary of Defense for the Environment stated in the September 1991 Legacy Report to Congress:

> Cultural resources are archeological and architectural resources. For archeology, it includes, but is not limited to, traditions, lifeways, cultural and religious practices, and other institutions to which a community, neighborhood, Native American tribe, or other group ascribes cultural significance, together with any artifacts and real property associated with such elements. For architecture, it includes, but is not limited to, buildings, sites, districts, structures, or objects, landscapes, and vistas. In addition, the term encompasses historic documents and relics. (DOD, 1991:156)

"Historic preservation" is the term used in the National Historic Preservation Act of 1966 (NHPA) and encompasses those historic properties that are eligible for the National Register according to Section 106 of NHPA. Cultural resources is the term of choice currently used by both the Department of Defense and the Air Force to encompass all resources in which a federal agency holds public trust according to all laws such as NHPA as well as the Native American Graves Protection and Repatriation Act. A resource does not necessarily need to be eligible for the National Register to be a cultural resource although the Advisory Council on Historic Preservation feels the real meaning of NHPA is all inclusive of these other cultural resources (Ramirez, 1992c; Fink,

1992). "Cultural Resources Management" (CRM) is defined as any "action taken which environmental and human factors are altered or managed. Such action is taken to reach planned goals, provide continued public benefits, and protect [cultural] resources" (Dept. USAF, 1992b). For the purposes of this thesis, the definition stated by the Deputy Assistant Secretary of Defense for the Environment was used and the terms "historic" and "cultural" resource were used concurrently.

Significance of Issue

In 1966, Congress realized that "historic properties significant to the Nation's heritage [were] being lost or substantially altered, often inadvertently, with increasing frequency" (ACHP and GSA, 1991b:I-1). The signing of NHPA in 1966 required national, state, and city governments to adopt new policies affecting preservation (Lewis, 1986:185).

Legislation and Directives. Recent Congressional legislation and HQ USAF directives have emphasized the importance of developing cultural resource management preservation plans. Congressional enactment of the "Legacy Law," in November 1990, required the Secretary of Defense to

> establish a strategy, plan, and priority list for identifying and managing all significant biological, geophysical, cultural, and historical resources existing on, or involving, all Department of Defense land, facilities, and property. (DOD, 1991:43)

General McPeak, USAF Chief of Staff, recently stated that we must "protect and enhance our national resources including wetlands, historic sites, and endangered species through sound stewardship and management" (McPeak, 1991). Major General Ahearn, the USAF Civil Engineer, echoed the importance

of cultural resource protection by identifying it as one of his strategic goals (USAF Civil Engineer, 1991:6).

Management Problems. In November 1991, the Department of Defense (DOD) requested working groups, from the National Council of State Historic Preservation Officers (NCSHPO), to address the management problems facing DOD's cultural resource program in November 1991. These working groups found several recurring problems. Most noticeably among these problems were outdated DOD procedures. The working groups also found that

> Service staff responsible for environmental management, history, historic preservation, documents management, and museums do not relate to one another in a predictable, systematic way even within a single service, and inter-service coordination occurs even more rarely. (Neumann and others, 1991:8)

Everyday management of cultural resources is dependent on the knowledge and interest of the personnel in the multi-disciplinary environment of the Base Comprehensive Planning (BCP) process. According to the working group's findings, "mechanisms need to be developed to ensure that all kinds of cultural resources are considered in planning" (Neumann and others, 1991:10). The most significant conclusion was the fact that cultural resources are often considered so late in the planning process that the resolution to a conflict is extremely expensive (Neumann and others, 1991:9). The working groups stated, "In most cases such conflicts could be avoided, at little or low cost, if they were identified at early, conceptual stages in the planning process" (Neumann and others, 1991:9).

Air Force Compliance. The Air Force's Chief of Natural Resources, Dr. Ludlow Clark stated, "Budget is not the cause of Air Force compliance problems, it is often ignorance or neglect" (Clark, 1992e). Several installations

have completed the initial stage of complying with the NHPA by performing surveys of their historic resources. Table 1 shows the status, as of December 1991, of the number of surveys and plans completed and/or required by AFR 126-7 (Akers, 1992c). This status indicates that several installations have not completed an inventory of cultural resources and/or a Cultural Resources Management Plan (CRMP).

Table 1

Status of Cultural Resource Management Requirements
(Completed/Required)

MAJCOM	Archeological Survey	Architectural Survey	CRMP
ATC	4/13	4/13	0/13
AU	2/2	2/2	2/2
AFSC	9/15	10/15	0/15
AFLC	5/7	7/7	0/7
MAC	5/13	5/13	0/13
PACAF	5/8	5/8	1/4
SAC	8/22	14/22	1/22
SPACE	2/12	2/12	1/12
TAC	11/17	10/17	2/17

(Akers, 1992b)

The NCSHPO working groups often found that having a CRMP does not mean it is effective. Some of these plans are often left on the shelves and others do not work because they are not effectively integrated with environmental or installation master planning; others are misinterpreted by poorly trained staff or are forgotten during staff rotations (Neumann and others, 1991:10).

Benefits of a Planning Primer. Exploratory research clearly suggested a need for guidance in the historic preservation planning process. During the initial research, the authors interviewed several key historic preservation personnel and asked them if a primer, which would summarize the requirements, standards, procedures, and techniques of cultural resource protection would be helpful.

Each person interviewed responded very favorably to the topic. Dr. Clark eagerly supported the topic and stated, "It is an excellent area to work on, and will have a real function in the Air Force" (Clark, 1992e). John Cullinane, Senior Architect for the Advisory Council, stated "They [The Council] are always looking at how existing DOD programs can be expanded or new programs should be implemented" (Cullinane, 1992c). He felt this project would be an excellent avenue toward that goal. Dr. Constance Ramirez, Chief of Army Natural Resources, endorsed the research saying the Air Force needs to decide what they need and provide support (Ramirez, 1992d). Lorretta Neumann, President of Consultant and Environmental Historic Preservation Incorporated and principal author of Defending Our Heritage, enthusiastically supported the research. Ms. Neumann said she was pleased the Air Force was taking a positive approach to historic preservation (Neumann, 1992).

Base-level historic preservation officers were also interviewed. Bill Metz, Chief Environmental Branch, F.E. Warren AFB, said that installation personnel

could definitely benefit from this research (Metz, 1992e). Larry Spanne, Supervising Archaeologist, Vandenberg AFB, confirmed the statement made by the NCSHPO working groups that our people need clear guidance (Spanne, 1992e). These preliminary interviews verified there was a need for a Cultural Resources Management Primer.

Specific Problem

The purpose of this research was to produce a USAF base-level primer for use as a guide to requirements, standards, and procedures concerning the preservation of cultural resources (see Appendix A).

Research Objectives

Objective One: Identify existing sources of cultural resource information.

1a. Identify the legal requirements for protection of cultural resources.

1b. Identify the Air Force policies, regulations, and other guidance that impact the protection of cultural and historic resources.

1c. Identify the manuals of procedures, data bases, and other guidance currently in use or programmed for use by the Air force and non-Air Force organizations to ensure full compliance with legal requirements.

1d. Determine how the Air Force addresses, identifies, and plans for the protection of cultural resources.

Objective Two: Identify the appropriate characteristics of a primer.

2a. Identify the target audience which will use the primer.

2b. Determine what kind of information is needed in the primer.

2c. Determine the appropriate format for the primer.

2d. Produce a "Cultural Resources Management Primer."

Scope

The HQ USAF Office of Natural Resources is responsible for implementing requirements relating to cultural and historic resource protection. It is also responsible for forest management, agricultural out-leasing, flood plain and wetland management, soil and water conservation, fish and wildlife conservation, urban forestry, and vegetation/pest management (Akers, 1992c). This research project included the development of a primer for cultural and historic resources only. Other responsibilities that fall under the domain of the HQ USAF Office of Natural Resources were not addressed. This research also did not attempt to justify the legal or regulatory requirements of cultural resource protection and historic preservation.

The focus of this primer was broad in scope and was intended for application at all CONUS Air Force installations. As such, any issue specific to a single MAJCOM, base, state, or geographic location was not covered in the primer. A primer covers the basic elements of a subject and is not intended to provide explicit technical details. However, a primer includes references to additional information with more detailed data (Morris and others, 1985:984).

Conclusion

This chapter introduced the fundamental concepts of historic preservation and cultural resources management, along with their relation to this research. Chapter II reviews the background of historic preservation and the current status of cultural resources management in the USAF. Chapter III identifies and describes the methodology used to achieve the research objectives. In Chapter IV, the results of the research endeavor are presented and analyzed. Chapter V summarizes the research and presents recommendations for future action.

II. Background

Introduction

The passage of the National Historic Preservation Act (NHPA) of 1966 is one of the most significant events in the protection of cultural and historic resources in the United States. This chapter chronicles the historic preservation movement and the passage of related legislation. The first portion of this chapter reviews events prior to the passage of NHPA. The remainder is an examination of NHPA, subsequent legislation, and Air Force cultural resource preservation activities.

Pre-National Historic Preservation Act

The preservation movement in the United States is, interestingly enough, older than the movement in the United Kingdom (Winks, 1976:141). As with many cultural movements in the United States, the very beginnings of the preservation movement were established by the private sector (Hosmer, 1965:21).

The Earliest Preservation Movement. The American preservation movement was a grass-roots endeavor. Its beginnings were purely amateur, but an emerging national awareness "caused some individuals to look upon the preservation of historic sites as a sign of cultural maturity" (Hosmer, 1965:22). Prior to 1920's, the movement was generally not well-organized (Hosmer, 1965:21-22).

Early preservation movements focused on national public figures or military events. The most notable beginning of America's preservation movement began where the country had its start. Americans of the nineteenth

century considered George Washington more of a divine leader than simply a man. These strong feelings aided in the development of the belief that Washington's home (Mount Vernon) ought to be the property of the nation. By 1850, several individuals had petitioned Congress to purchase Mount Vernon. During 1853, rumors persisted that private businessmen were about to purchase the farm in hopes of developing a park or a resort hotel. These rumors undoubtedly triggered the initial preservation movement (Carnett, 1991:1; Hosmer, 1965:41-42).

In 1856, the Virginia State Legislature chartered the Mount Vernon Ladies' Association for the Union to accept the title of the property. Miss Ann Pamela Cunningham was the leader of the Ladies' Association and has since become to be known as the founder of the preservation movement. Two years later the State of Virginia issued bonds to collect the $200,000 required to purchase Mount Vernon (Hosmer, 1965:45).

The next important event in the background of preservation was the Arlington Mansion, Virginia. Shortly after Robert E. Lee joined the forces of the South, federal troops occupied the property of Lee's Mansion (Arlington) in 1861. The mansion was then the residence for Union officers and their families during the remainder of the Civil War. Charles Hosmer describes the words of noted Arlington Mansion historian Murray Nelligan. Nelligan believed the

> Secretary of War Edwin M. Stanton [was] determined that the Lee family should never occupy their home again. He placed a hospital on the grounds, along with a freemen's village for Negro refugees from the South. Not stopping there, he had a tax levied on the property. (Hosmer, 1965:63)

After the Civil War, a relative of Lee offered to pay the taxes. The authorities; however, did not believe that would be allowed by law. The property was then placed for sale at a public auction (Hosmer, 1965:63).

Because of many uncertainties held by the public on the legality of the confiscation and sale of the mansion, the government was the high bidder. The property was purchased for $26,800. Through the urging of Secretary Stanton, a national cemetery was established on the grounds. Many felt that to keep anyone from inhabiting the house, graves were purposely placed near the house itself (Hosmer, 1965:63).

Several years later, General George W.C. Lee, son of Robert E. Lee, petitioned the government for fair payment for the property since he felt he was the rightful owner of the Arlington Mansion. Congress appropriated funds for the payment, and twenty-two years after the Union had captured the grounds, the government acquired the legal title to Arlington. The actual restoration of the mansion did not occur until 1924 when Congress passed a bill authorizing the restoration to its original condition in hopes of healing the wounds of the Civil War (Hosmer, 1965:64-65). "Thus, largely by accident, and for an unsavory purpose, the federal government came to own its first historic house" (Hosmer, 1965:65).

The preservation of Monticello, Thomas Jefferson's home, spans nearly a hundred years. Several people attempted to purchase Monticello for the purpose of making it public property. The home was successfully purchased by a Navy lieutenant named Uriah Levy in 1836. However, the actual preservation did not occur until 1926 . "The Monticello movement marked a transition in the thinking of some Americans toward preservation" (Hosmer, 1965:192). For a majority of the ninety years it took to preserve Monticello, those who attempted

to restore it, dwelled on "its sacredness as a historic shrine" (Hosmer, 1965:192). The people who preserved Monticello, used tactics that are still in use today. They appealed either to innate values of the architecture or the historical significance (Hosmer, 1965:153,190,192).

After the Civil War, the Association for the Preservation of Virginia Antiquities (APVA) was the first private preservation group to organize in the South. Historians feel the APVA was founded due to the collapse of a brick ruin called the "Powhatan's Chimney." In 1889, the Virginia legislature chartered the APVA, thus allowing the group to own property in the state. The APVA spent the majority of its time attempting to preserve Jamestown Island. Other important APVA projects included the Mary Washington cottage, the Old Stone House in Richmond, and several Confederate antiquities (Hosmer, 1965:65-70).

The effort to preserve archeological sites and Native American antiquities was different from that involving structures. There was very little involvement by the Federal government prior to the end of the 19th century. The first scientific excavation of an archeological site in the United States is attributed to Thomas Jefferson, who systematically excavated a mound in eastern Virginia in order to answer questions about the manner in which Indians were buried in mounds (Woodward and McDonald, 1986:30).

As white settlement spread inland from the coast, many ancient earthworks were discovered. The presence of many of the works did not become evident until after trees were cleared from the land. Some of the earthworks were very large and exhibited lots of geometric precision. Most people did not believe that the Indians had the technology or organizational skills to construct such vast undertakings. There were lots of theories in the early 1800's as to the origin of the earthworks. There was a widespread feeling

during the 19th century that the mounds and earthworks had been built by a lost race of civilized people, but there was no consensus among the advocates of the lost race idea as to the identity of the people responsible. "Vikings, Greeks, Israelites, Persians, Phoenicians, and emigrants from Atlantis were all put forth as candidates" (Woodward and McDonald, 1986:28).

The Grave Creek Mound in West Virginia became a tourist attraction in the late 1700's. However, most of the mounds and earthworks were destroyed or altered by development. Curiosity seekers excavated many of the sites. Some of the mounds and earthworks received almost inadvertent protection. The mounds were known to be burial features. Cemeteries were sometimes established around the mounds. In a few cases, public parks which were established included earthworks (Woodward and McDonald, 1986:25-27).

In 1888 the State of Ohio passed the first law in the United States designed to protect archeological resources. This legislation was passed in response to the threat to Serpent Mound in Adams County. Serpent Mound is an effigy of a snake approximately one quarter of a mile long. "At one time this effigy mound was considered to be a mark of God that indicated the location of the Garden of Eden" (Woodward and McDonald, 1986:90). Frederick Ward Putman of Harvard University's Peabody Museum did a scientific study of the site, and lead efforts to raise $5,880 for purchase of the of the site and protected it from destruction. "Ohio's antiquity legislation and the creation of Serpent Mound Park aroused nationwide interest in passing antiquities legislation and in preserving archeological sites for the enjoyment and enlightenment of the public" (Woodward and McDonald, 1986:30).

The first stride on the part of the Federal government toward preserving these types of historical treasures occurred in 1889. At that time Congress

authorized the President to preserve a region in Arizona containing the prehistoric Casa Grande ruin (Mackintosh:1). Federal policy to preserve archeological sites was first put into law with the passage of the Antiquities Act of 1906. This law gave the President the authority to "establish national monuments on Federal lands for the purpose of protecting historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest" (Carnett, 1991:2). Prior to passage of the Antiquities Act, specific legislative action was required for each site. The law also required authorization for any investigation of archeological sites. However, the Antiquities Act only protected sites which were located on Federal or Indian land (Carnett, 1991:2).

The Preservation Movement Grows. The purpose and description of an antiquity no longer had a single meaning by the late 1800's. By this time, numerous preservation groups had been created for as many reasons. The Hollywood Memorial Association was formed in order to decorate the graves of fallen Confederate soldiers. The Confederate Memorial Literary Society was formed with the intention of preserving the White House of the Confederacy. The Ladies' Hermitage Association appeared in Nashville, Tennessee. The Hermitage was formed in 1888 to create an Andrew Jackson memorial museum (Hosmer, 1965:69-72).

The figure of Abraham Lincoln also became a focal point for preservation efforts. His homestead, in Springfield, Illinois, became the first historical antiquity associated with Lincoln to be saved. His home was rehabilitated and opened as a museum. The Memorial Association of the District of Columbia was chartered in 1892 to save the residences made historic by Lincoln. The first structure to be preserved by the Memorial Association was the Peterson house, which was the "House Where Lincoln Died ." The Memorial Association found

it difficult to raise the funds required to preserve the Peterson house. They needed a method to create a social preservation conscience. The Memorial Association developed a technique that is still used to this day. They printed a booklet entitled Words from Many Sources. The booklet included writings of notable Americans, speaking of their reasons for preserving the "House Where Lincoln Died" (Hosmer, 1965:72-75).

During the late 1800's, the restoration of memorials of the Revolutionary War became the setting for preservation activity. The Hudson River Valley contained several Revolution battlefields and a large amount of historic buildings. Most preservationists in this region "looked upon saving old buildings as an educational activity which local and state governments should support" (Hosmer, 1965:101). The Fairmount Park in Philadelphia became the first significant Revolution preservation effort. Several buildings in the Manhattan Island area also became an area of interest. These buildings were used by George Washington and his generals as his headquarters (Hosmer, 1965:76-79).

After the Civil War, the Army recorded the places and events it encountered during its battles and missions across the heartland of the nation. During the late 1800's and early 1900's, the Army tended the first federal parks and reservations before the National Park Service was established. These included Yellowstone and Yosemite National Parks (Neumann, 1991:5). Lobbying groups for veterans' organizations pressed Congress to establish parks and landmarks at major battlefields . After the establishment of Arlingtor National Cemetery, one of the first battlefield memorials to be founded was the Vicksburg National Military Park in Mississippi. Other important battlefields and military cemeteries curated by the Army included: Yorktown, Gettysburg,

and Antietam. These were all managed by the Army until they were turned over to the National Park Service in the 1930's (Mackintosh, 1985:1; Neumann, 1991:5).

The restoration of Williamsburg, Virginia, was the haven of scholarly restoration activities in the early 1900's. The Williamsburg Project was a collaboration of efforts by such noted people as John D. Rockefeller, Jr., W.A.R. Goodwin, William G. Perry, and Charles M. Robinson. The first undertaking completed under the project was the restoration of the Wythe House (Hosmer, 1981:898).

The 1930's saw a number of firsts in the preservation movement. The city of Charleston, South Carolina, passed the first preservation zoning ordinance. The first city commission to regulate environmental and aesthetic qualities was created in New Orleans, Louisiana, and Stratford Hall became one of the first important historic and architectural landmarks. As city and state governments played important roles in preservation, the National Park Service, the U.S. Military, and the Secretary of the Interior all played an important part in the evolution of the preservation movement (ACHP and GSA, 1991a:II-5; Hosmer, 1981:1065).

Legislative Actions. In 1949, Congress chartered and appropriated an organization that is allowed to own and preserve historic sites, buildings, and objects significant in American history and culture. This organization is the National Trust for Historic Preservation (National Trust). Prior to the formulation of the National Trust, Congress passed two federal laws that set the stage for modern preservation legislation.

The first enactment of legislation occurred with the signing of the Antiquities Act of 1906. This law "provides for the protection of historic and

prehistoric ruins and objects of antiquity on federal lands, and authorizes scientific investigation of antiquities on federal lands" (Dept. USAF, 1987:14). The Act made it Federal policy to preserve historic and prehistoric sites on Federal land. It also gave the President the authority to establish national monuments (Carnett, 1991:2).

Until 1933, preservation had been largely in the field of architecture. During this year, the National Park Service began employing a number of historians, architects, engineers, and archaeologists to develop a program which would begin to educate the public on the history and national culture of the United States. During the Depression, the policies of the New Deal allowed the National Park Service to dominate the expansion of the preservation movement. In spring of 1934, the chief historian for the Park Service began drafting the outline for the Historic Sites Act (Hosmer, 1981:927-928).

The Historic Sites Act was signed into law in 1935. The Act declared it Federal policy to preserve historic and prehistoric properties of national significance. The Historic Sites Act covered all significant properties, whereas the Antiquities Act focused on Federal lands. The Historic Sites Act of 1935 authorized the designation of national historic sites and landmarks. It also enabled interagency efforts to preserve historic resources, and established a fine for violations of the Act (Carnett, 1991:2; Dept. USAF, 1987:14).

National Trust for Historic Preservation. World War II brought an sudden shift away from the preservation movement as the government limited its historic interests. The National Park Service lost all but its own operating appropriations. Limited access to tires and gas rationing kept many visitors from historic sites and landmarks. The limited appropriations also caused many of the historic sites to be neglected . Although there were a few instances of

valiant preservation efforts by those in the Park Service and private sector, World War II created a crisis in the preservation movement (Hosmer, 1981:717-722,813).

Several informed individuals formed the National Council for Historic Sites and Buildings in 1947. These people were convinced that "a national preservation organization was the only answer for the many important properties coming on the market--properties that could not possibly be saved by local groups" (Hosmer, 1981:861). The National Council for Historic Sites and Buildings endorsed a request that a "national trust" be organized and chartered by Congress. The intention of the trust was to "carry out the preservation purposes of the Historic Sites Act of 1935 by marshaling the resources of private historical organizations in the United States under federal auspices" (Hosmer, 1981:861). A select group of the National Council for Historic Sites and Buildings began drafting the trust bill that would go to Congress. By late 1949, the bill had passed both the House and the Senate. The National Council was selected to organize the initial National Trust for Historic Preservation. These people realized the difficult responsibility the National Trust was delegated with. There were both uncontrolled and unplanned streams of requests for preservation (Hosmer, 1981:861,864).

Current cultural resources protection law is most attributable to the massive federal infrastructure building programs of the 1950's and 1960's, and also the nation's growing environmental awareness. During the decades following World War II the federal government funded projects for dams, highways, urban renewal, and so forth. These projects were often completed with little regard for cultural resources. The National Historic Preservation Act of 1966 was passed to address those concerns (ACHP and GSA, 1991a:II-5).

By the early 1960's federal preservation law rested on four bases:

> 1. Study and designation of nationally significant sites;
> 2. regulation of the taking of archeological resources;
> 3. acquisition and preservation of privately owned properties and the preservation of sites on federal lands; and
> 4. National Park Service assistance and specific legislative directives to several agencies with the power to adversely affect historic resources. (CF & NCPL, 1983:193).

Post-National Historic Preservation Act of 1966

National Historic Preservation Act. A study by the United States Conference of Mayors concluded that the public was steadily becoming more interested in the preservation of America's heritage. This study and the eventual report to Congress initiated the drafting of first significant preservation law (ACHP, 1985:6).

The National Trust for Historic Preservation reminded its newsletter readers in 1986 that:

> The 1966 law set in motion two decades of progress that have brought expansion of the National Register of Historic Places to more than 45,000 listings, creation of historic preservation offices in every state, and establishment of the Advisory Council on Historic Preservation to monitor thousands of federal and federally assisted projects. (Berke, 1986:4)

The law to which the National Trust speaks of is the National Historic Preservation Act (NHPA) of 1966, as amended. This law establishes historic preservation as a national policy and defines it as the protection, rehabilitation, restoration, and reconstruction of "districts, sites, building, structures, and objects significant in American history, architecture, archeology, engineering, and culture" (ACHP, 1984b:3). This law also established the Advisory Council on Historic Preservation, the "major policy advisor to the Government in the

field of historic preservation" (ACHP, 1990). Amendments to the NHPA in 1980 directed the Secretary of the Interior to "establish guidelines for nationally significant properties; curation of artifacts, documentation of historic properties, and preservation of federally owned historic sites" (Dept. USAF, 1987:14). The intent of the guidelines and standards set by the Secretary of the Interior were to assist the long-term preservation of a property's significance through the preservation of historic materials and features (NPS, 1991a:4).

Related Legislation. Along with NHPA, there have been several legislative actions taken by Congress to further support preservation concerns. Table 2 shows a list of the numerous laws that affect cultural resources preservation.

Table 2

Modern Cultural Resource Preservation Laws

Department of Transportation Act of 1966
National Environmental Policy Act of 1969
Archeological and Historic Preservation Act of 1974
Public Buildings Cooperative Use Act of 1976
American Indian Religious Freedom Act of 1978
Archeological Resources Protection Act of 1979
Housing and Community Development Act (et seq)
Legacy Resource Management Program Act of 1990
(NPS, 1989; ACHP and GSA, 1991b)

This list is not all encompassing, but includes the major legislation concerning cultural resources management. Other laws include: the Federal Records Act, the Historic Shipwrecks Act, the Moss-Bennett Act, and the Native American Graves Protection and Repatriation Act (ACHP and GSA, 1991b:I-1).

Regulations. Several Federal regulations have been written to assist in the supervision and compliance with the legislation. The regulations that apply directly to federal agencies such as the Air Force are shown in Table 3.

Table 3

Federal Agency Cultural Resource Regulations

36 CFR Part 800: Protection of Historic Properties
36 CFR Part 60: National Register of Historic Places
36 CFR Part 61: Procedures for Approved State and Local Government Historic Preservation Programs
36 CFR Part 78: Waiver of Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act
43 CFR Part 7: Protection of Archeological Resources
(ACHP and GSA, 1991b:II-1)

Federal Historic Preservation Case Law. The NHPA represents a general policy of supporting and encouraging the historic preservation and the protection of cultural resources. The law accomplishes this through four mandates (ACHP, 1985:6). First, the act authorizes the Secretary of the Interior to expand and maintain a National Register of Historic Places. Second, NHPA

advocates State and local preservation programs. Third, NHPA sanctions a grant program that provides funds to the States for projects and to individuals for the preservation of properties listed in the National Register. Fourth, the law establishes the Advisory Council on Historic Preservation as a Federal agency, composed of nineteen members, which directly advises the President on preservation matters (ACHP, 1984b:3-4).

Section 106 of NHPA requires Federal agencies to determine the magnitude of projects on any eligible sites, structures, or objects of historical significance. It also requires these agencies to give the Council an opportunity to comment on the project and its affect on cultural resources (ACHP, 1984b:10). The Council has established regulations to which ensure federal agencies comply with Section 106. These regulations are contained in 36 CFR part 800. Section 106 and 36 CFR Part 800 both give direction on determining the magnitude of projects on any eligible sites, structures, or objects (Ferguson, 1991).

Section 110 of NHPA was amended into the law in 1980 in response to Executive Order No. 11593, signed in 1973. Both the Congress and the President acknowledged the need for established plans and procedures that Federal agencies could follow (ACHP, 1985:7). Section 110 accomplishes this and also directs these agencies to carry out their programs and projects in accordance with the purposes of NHPA. With these two directives, the section also includes such requirements as using historic buildings, recording of historic properties prior to demolition, designation of preservation officers, establishes preservation awards programs, and transferring surplus Federal historic properties (ACHP, 1984b:11).

The National Environmental Policy Act (NEPA) of 1969 also requires Federal agencies to take environmental considerations into account during the decision-making process. NEPA requires "that federal agencies evaluate the environmental impacts of their proposed actions and consider alternatives to proposed actions. This evaluation is to provide federal decision makers with information on the potential environmental effects of their decisions, to disclose to the public these potential effects, and to improve the quality of decisions by consideration of their impact " (CF & NCPL, 1983:215). The courts have held that when an Environmental Impact Statement (EIS) is prepared, a thorough discussion of the cultural resources involved in the project must be included (ACHP, 1985:17).

Since the passage of NHPA in 1966, there have been well over ninety separate court cases concerning historic preservation. The last comprehensive compilation of court cases was completed in 1985. At that time, fifteen cases involved the Department of Defense. A majority of these cases involved a plaintiff stating that a Federal agency was not meeting its review responsibilities. Recently, the "litigation has centered on the adequacy of agency compliance with the procedural requirements imposed by preservation authorities" (ACHP, 1985:22). The only cases that were found in favor of the plaintiff were due to the "arbitrary or capricious" actions by the Federal agency. "To date, there has been no published opinion addressing the question of agencies' substantive responsibilities under NHPA" (ACHP, 1985:22).

Air Force Historic Preservation Activities. Air Force Regulation 126-7 provides the "policies, procedures, and responsibilities for protection and managing historic resources on Air Force installations" (Dept. USAF, 1987:1).

Within AFR 126-7, the main directives from congressional legislation are listed and require Air Force agencies to:

> Provide leadership in the preservation of the historic resources of the United States. Direct their policies, plans, and programs in such a way that federally-owned sites, structures, and objects of historical, architectural, or archeological significance are preserved, restored, and maintained for the inspiration and benefit of the people.
>
> Locate, inventory, and nominate to the Secretary of the Interior all districts, sites, buildings, structures, and objects under their ownership of control that appear to qualify for listing on the National Register of Historic Places (National Register).
>
> Initiate procedures to ensure that good faith consultation with the Advisory Council on Historic Preservation and State Historic Preservation Officers takes place before undertaking any action that could affect sites, structures, and objects listed on the National Register or eligible for listing. (Dept USAF, 1987:2)

The Air Force, as with several Federal agencies, has often felt historic preservation was "inappropriate for scientific research and development [activities]" (ACHP, 1991b:x). In February of 1991, the Council reported to Congress their recommendations for highly technical or scientific facilities compliance toward NHPA. The central issue discussed in this report is how organizations, such as the Air Force, can meet their obligations as stewards of the Nation's historic scientific resources, given their continuous need to modify or replace historic facilities and equipment. The Council "rejected the assumption that the NHPA is fine for the majority of federal activities, but inappropriate for scientific research and development" (ACHP, 1991b:x).

Legacy Program. In 1991, Congress established the "Legacy Program" and subsequently authorized $35 million for fiscal years 1991 and 1992. The Legacy Program "offers a way for DOD to re-examine how decisions [concerning cultural resources] are and should be made at all levels throughout the services" (Neumann, 1991:1). The DOD began a series of internal reviews

of its existing programs and initiated several demonstration projects intended to investigate new approaches toward the management of cultural resources. During this same time, the NCSHPO was asked by the DOD to help identify "strengths and weaknesses in existing programs and define opportunities for improvement" (DOD, 1991:1).

The Air Force has made some significant progress toward the preservation of the cultural resources it controls. In the Preliminary Working Report to the Cultural Resources Program Development Task Area in December 1991, the NCSHPO states:

> The Air Force recently issued guidelines for consultation with Native American groups, which should go far toward encouraging sensitive treatment of traditional places of value to Native Americans. (Neumann, 1991:7)

The Air Force has also been an active participant in the Legacy Resource Management Program. Wright-Patterson's Historic Preservation Office is the lead in one of the Legacy Program's most significant projects. Huffman Prairie Flying Field, the "site where the Wright Brothers perfected their understanding and control of the aerodynamics of flight and operated one of the first schools of aviation. . .," is currently under an enhancement project (DOD, 1991:37). Huffman Field was designated a National Historic Landmark (NHL) in 1990 (DOD, 1991:37).

The Air Force also owns other substantial cultural resources. Table 4 includes a list, by state, of all known Air Force owned and maintained cultural resources (Akers, 1992b). Several other properties have been nominated and are in the process of being evaluated as of 1 January 1992 (Clark, 1992d).

Table 4

Air Force National Register of Historic Places

State	Location	Name of Property
Alabama	Maxwell AFB	Austin Hall Community College of the Air Force Officer's Quarters Historic District
Arizona	Luke AFB	El Camino Del Diablo Trail
Arkansas	Eaker AFB	Archeological sites
California	Edwards AFB	Rogers Dry Lake
	Los Angeles AFB	500 Varas Square American Trona Corporation Building
	March AFB	March Field
	McClellan AFB	Sacramento Air Depot Historic District
	Vandenberg AFB	Space Launch Complex 10 Archeological sites
Colorado	Lowry AFB	Eisenhower Chapel General's Quarters Selected Facilities
	USAF Academy	Pioneer Cabin Carlton House
Florida	Cape Canaveral	Launch Pads 5, 6, 13, 14, 19, 26, 34 and mission control
Guam	Anderson AFB	Northwest Field
Hawaii	Bellows AFB	Bellows Field Archeological Area
	Hickam AFB	Hickam Field
	Wheeler AFB	Wheeler Field
Kansas	McConnell AFB	Air Terminal Building 1
Kentucky	Standiford ANGB	Archeological site

(Akers, 1992b)

Table 4 (continued)

Air Force National Register of Historic Places

State	Location	Name of Property
Missouri	Jefferson ANGS	Jefferson Barracks Historic District
	St Louis AFS	St. Louis AFS
Nebraska	Offutt AFB	Blacksmith Shop
		Fort Crook Historic District
New York	Plattsbugh AFB	Old Stone Barracks
		United States Oval Historic District
North Carolina	Pope AFB	Hangars 4 and 5
		Historic District
Ohio	Wright	Wright Brothers Memorial Mound Group
	Patterson AFB	WPAFB Mound
		Huffman Flying Field
Texas	Brooks AFB	Hangar 9
	Carswell AFB	Buck Oaks Farm
	Randolph AFB	Administration Building
		Chapel
U.S. Minor Islands	Pacific Ocean	Wake Island
Utah	Wendover AFS	Wendover AFS Historic District
Wyoming	F.E. Warren AFB	Fort David A. Russell

(Akers, 1992b)

Base Comprehensive Planning Process. Cultural resources management is one aspect of the Air Force Base Comprehensive Planning

> process that identifies long-term priorities and goals of the installation and translates those priorities and goals into concrete land use, facility, and related infrastructure objectives and policies, as well as natural resource protection and efficient use of all resources. (Dept. USAF, 1989a:1-5)

Figure 1 shows how each component plan addresses specific functions or programs for the base. Air Force cultural resources management planning is part of the much broader category of natural resources. Natural Resource components of the BCP are required by Air Force regulations (Dept. USAF, 1989a). The Natural Resources component plan "must be closely coordinated [with all other component plans] to ensure consistency and compatibility (Dept. USAF, 1989a:2-11).

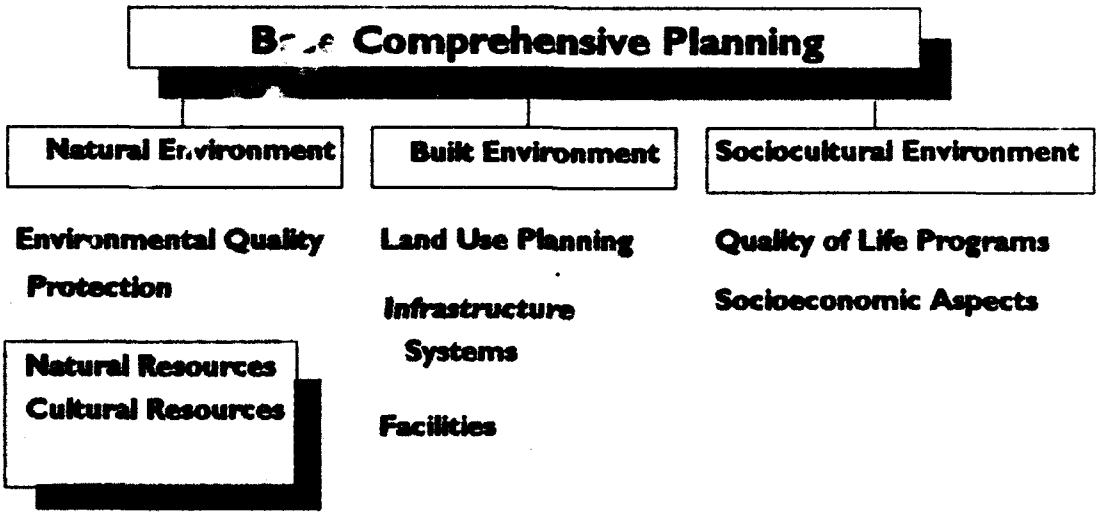


Figure 1. Base Comprehensive Component Plans (Dept. USAF, 1989a)

Conclusion

The National Historic Preservation Act and subsequent legislation has had a significant impact on the way private and public entities operate. The Air Force and DOD are no exception.

Complying with legal requirements for historic preservation involves a consultation process to determine the significance and eligibility of the cultural

and historic resources in question. The Air Force has numerous holdings which have already been identified. It is likely that additional resources will be identified in the future.

Air Force cultural resources management activities are governed by the same legislation and regulations which govern the activities of other entities. Additionally, Air Force regulation AFR 126-7, Historic Preservation, and AFR 86-4, Base Comprehensive Planning, are important elements in the Air Force effort to comply with the legal requirements for sound management of the nation's cultural resources.

Over the years, this nation's cultural resources have been given increasing levels of protection under the law. Like other aspects of environmental protection, the legal requirements for cultural resource protection are not likely to diminish in the future. If anything, there may be even more stringent requirements. Several DOD studies have outlined the need for additional training of staff which are responsible for the sound management and stewarship of Air Force cultural resources. A cultural resources management primer is one tool to help Air Force staff meet the challenge.

III. Methodology

Introduction

. The purpose of this chapter was to outline the methods used in the development of the Cultural Resources Management Primer. The chapter includes a summary of the research method, as well as sections on data collection, content analysis, primer format, and validation of the research product. The final methodology employed in the research was eclectic in style, using two separate AFIT theses as a basis. However, the authors attempted to improve upon these previously completed thesis methodologies.

Research Method

The purpose of this research was to produce a USAF base-level primer to be used as a guide to requirements, standards, and procedures concerning the preservation of cultural resources. Two research objectives were identified during the scoping of this project. Objective One was the identification of existing sources of cultural resource information. Objective Two was to identify the appropriate characteristics of a useful primer.

Objective One and its sub-objectives were designed to determine what requirements the Air Force must meet to comply with cultural resource legislation and how those requirements meld into the current Air Force environmental compliance programs. Objective Two and its sub-objectives were designed to determine the content and format of the primer.

An AFIT thesis by Captain Richard T. Devereaux addressed the problem of condensing enormous amounts of data into a single source. While this thesis was did not research cultural resources, it did offer an excellent basis for this

research. Within the Devereaux thesis, information was gathered and organized "in a matrix format so that each ... issue could be cross-referenced with the appropriate source document" (Devereaux, 1988:51). Use of this "matrix approach" allowed the data collected on cultural resources and historic preservation issues to be "integrated and synthesized into several topical areas which provide a useful organizational structure" (Devereaux, 1988:106) for the primer . The matrix approach not only provided a useful way to categorize the data, but provided the basis of the table of contents for the primer (Devereaux, 1988:106-107). Figure 2 illustrates the entire research process.

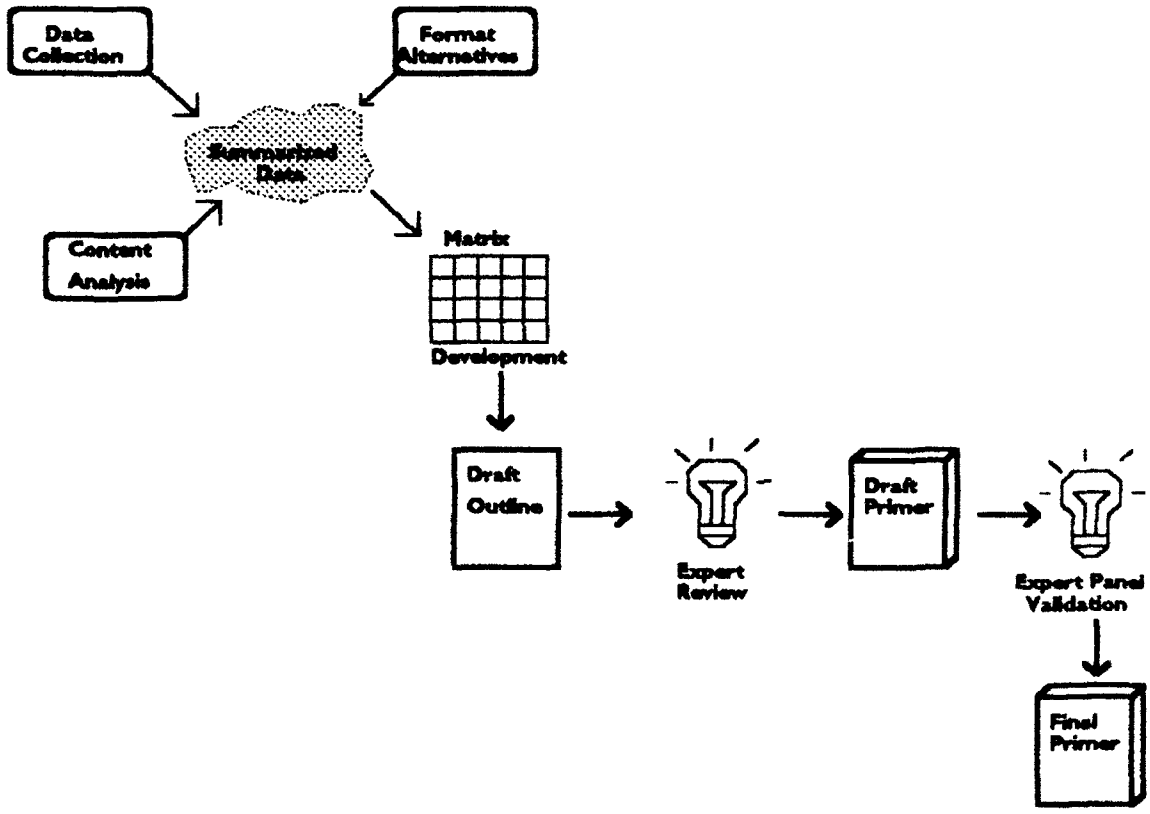


Figure 2. Thesis Research Diagram, Revised from Devereaux (Devereaux, 1988:52)

Similar to the validation method employed by Devereaux, an "expert panel" process was used to validate the primer. However, this research validation process occurred in two stages. First, the Expert Panel (Table 5) reviewed the topical areas proposed for the primer as a result of an analysis of the collected data. This step was not used in the Devereaux research. In the final validation step, the Expert Panel reviewed the completed primer document. The completed primer is contained in Appendix A.

Data Collection

Information for this research was drawn from several sources, including an exploratory research (unstructured interviews and literature review), specialized training, and telephone interviews.

Exploratory Research. The exploratory research began with unstructured interviews with experts in the historic preservation field. These interviews indicated the relevant data sources. These data sources included: DOD regulations, directives, Congressional law, training courses, Advisory Council and National Park Service publications, and other sources of preservation information.

Literature Review. Literature on the subject area provided the bulk of the information required. As this is a specialized field, a significant portion of the information came from the Advisory Council on Historic Preservation, National Trust for Historic Preservation, State Historic Preservation Officers (SHPOs), HQ USAF/CEVP (Office of Cultural Resources), HQ USA/CEHSC (Office of Cultural Resources), MAJCOM historic preservation officers and Base Historic Preservation Officers (BHPOs)

Table 5

Expert Panel

Name	Title and Location
Akers, Donna	Cultural Resources Program Manager HQ USAF, Washington DC
Clark, Ludlow Ph.D.	Chief Air Force Natural/Cultural Resources AFCEE, Bolling AFB DC
Cullinane, John A.I.A.	Senior Architect The Advisory Council, Washington DC
Engleman, Lynn	Cultural Resources Program Director HQ AFMC, Wright-Patterson AFB, OH
Ferguson, Jan Ph.D.	Base Historic Preservation Officer Wright-Patterson AFB, OH
Lillie, Tom, Maj, USAF Ph.D.	Chief, Natural and Cultural Resources HQ USAF, Washington DC
Metz, William	Chief Environmental Branch F.E. Warren AFB, WY
Ramirez, Constance Ph.D.	Chief Army Historic Preservation Officer Fort Belvoir, VA
Spanne, Larry	Supervising Archeologist Vandenberg AFB, CA

The bibliographies of initially obtained materials provided other sources. Additionally, a search of computerized data bases such as DIALOG and DTIC was conducted to identify sources of information.

Specialized Training. The researchers attended a training course conducted by the Advisory Council on Historic Preservation. This course was designed to provide managers of Federal installations much of the information needed to comply with legal requirements for cultural and historic preservation of resources (ACHP, 1992).

Content Analysis

The level of coverage or content of the primer was difficult to determine. Several methods were used to resolve the issues to be covered in the primer document; however, a certain amount of subjectivity, on the part of the authors, was required in this stage of the research. In an attempt to reduce this subjectivity, base-level and MAJCOM personnel working cultural resource issues were interviewed for input. After the interview phase of the project, the researchers conducted a literature review and requested input from the Expert Panel.

Interviews. MAJCOM and base-level personnel who work cultural resource issues were interviewed by telephone. The interviews provided information relating to the level-of-content and format of a base-level primer. Telephone interviewing offers several advantages in the gathering information. These advantages include a high response rate and rapid completion (Babbit and Nystrom, 1989:11; Emory, 1991:330-332).

For this project it was desired to gather as many complete ideas as possible from the interview process. "A structured interview using open-ended

questions [produces] ... more complete information than a typical questionnaire" (Babbitt and Nystrom:12). The questions used for the telephone interviews with Air Force personnel were drawn from a 1992 Advisory Council survey of DOD installations and the Lavery thesis, which used a survey of base-level personnel to determine the content of a users guide (ACHP, 1991a; Lavery, 1988). The interview questions, shown in Appendix B, were pilot tested on AFIT students.

Non probability sampling was used because "such a procedure satisfactorily [met] the sampling objectives" (Emory, 1991:273) of the research. The sample of bases to be interviewed was drawn from bases that owned a property, as of December 1991, which is listed or is eligible to be listed on the National Register of Historic Places . The person designated as the Base or MAJCOM Historic Preservation Officer was interviewed. This population was used because these bases have intuitively acquired a substantial amount of experience, and hence provided more useful and objective input related to the research.

To ensure that any concerns which might have been unique were addressed, several MAJCOM personnel were also interviewed . The limited objectives of this research required that the authors look only "for a range of conditions or for examples of dramatic variations" (Emory, 1991:273).

Content Literature. Current literature on the topic of determining the content of a manual was reviewed. This information covered a ~as such as the definition of the audience, understanding the audience, type of content, and organizing manuals (Price, 1984:1-131; Lavery, 1988:16).

Draft Outline Development. The exploratory literature review and telephone interviews provided the information required to develop an information matrix. The matrix allowed for a method to put the data into a

useful form. The data source information was organized into a "matrix format so that each [cultural resource] issue could be cross-referenced with its appropriate source document [or interview]" (Devereaux, 1988:51). This information was used to develop a draft outline for the primer.

The Expert Panel was given a copy of this draft outline for review, comments, and recommended revisions. An Expert Panel analysis of the information was completed to determine if the content and format of the primer was appropriate. This phase of the research also verified that no significant areas were overlooked.

Format Alternatives

The appropriate publication format of the primer was determined by two methods. First, current examples of manuals and bulletins were reviewed for their format characteristics. These examples included Air Force environmental and planning manuals, Advisory Council publications, and National Park Service publications. Second, information concerning the format of published documents, desk-top publishing, and general appearance of a manual was reviewed (Lavery, 1988:21-25). This information was also included in the data matrix for ease of use.

Primer Validation

The Expert Panel reviewed the primer for accuracy and subject matter content. The primer was revised to incorporate the comments of the reviewers. The members of the Expert Panel were contacted during the developmental stage of this research project and consented at that time to involvement in the project.

Conclusion

As illustrated by the above discussion, several methodologies were employed to produce a USAF base-level primer to be used as a guide for requirements, standards, and procedures concerning the preservation of cultural resources. The Devereaux and Lavery theses were used as a basis for the methodology, but an additional Expert Panel review was included, in hopes of improving the content level of the product. The chapters that follow discuss the results of the methodology, the conclusions, and the recommendations which evolved from the study.

IV. Results

Introduction

A base-level primer for U. S. Air Force Cultural Resources Management was produced by this research effort. The authors used the methodology outlined previously in Chapter Three for development of the fundamental text book. Application of the methodology was relatively straight forward.

Assimilating a large volume of information and condensing the most pertinent data into a user-friendly document was a challenging task. The researchers collected information from a variety of sources and organized the data into topical areas. The initial topical outline for the primer was developed from a matrix of issues and data sources. Given the volume of data, it was not until after the Expert Panel had reviewed the proposed scope of the primer that the researchers proceeded, with a large degree of confidence, with the writing of the primer document.

As a final validation of the project, the members of the Expert Panel reviewed the USAF Cultural Resources Management Primer. All panelists felt the researchers had produced an acceptable or even an outstanding document.

Data Collection Process

Initial exploratory interviews with historic preservation experts provided input to what data sources were available. The research relied heavily on the personal and telephone interviews with these experts to augment the literature review process to insure all relevant information was collected. Three sources were used to identify the legal requirements for the protection of cultural resources (Research Objective 1a). These sources were The Council, The

National Park Service, and The Section 106 Training Course. Interviews with various Air Force and Army personnel assisted in the identification and determination of Research Objectives 1b through 1d.

The Advisory Council was interviewed to determine what sources of information published by them would be appropriate as reference material for the primer. Appendix C (Advisory Council Publications) lists the publications recommended by The Council (Naber, 1992). The National Park Service was also interviewed to determine the sources of information in which the Park Service recommended for this project. Dr. Tim McKeown recommended the publications listed in Appendix C (NPS Publications)(McKeown, 1992). The Section 106 Training Course also allowed for a first-hand interview session with The Council instructors. The instructors supplied input to the data source list (ACHP and GSA, 1992).

Various interviews with Air Force and Army cultural resources management personnel supplied the information required to answer research questions 1b through 1d. Appendix C lists the data sources compiled through these interviews.

Content Analysis

Often manuals can turn out to be "unhelpful, inaccurate, [and] non communicative" (Price, 1984:6). There are many reasons for a bad manual. The four main reasons according to Jonathan Price are the schedule for completion of the project, lack of audience definition, poor design, and disdain for the audience (Price, 1984:6). The schedule for this project was already set during the thesis development stage. The authors certainly did not have any

disdain for the audience of the primer. However, defining the audience and designing the primer were not as simplistic.

Identify the Target Audience. Price noted there are five areas in which to understand the audience. These areas were "get specific, distinguish between audiences, deepen the focus on their goals, remember they're smart, organize around what they want, imagine their questions, and conduct research" (Price, 1984:31-34).

In the early stages of the research, the authors intended to identify the target audience through the results of an Advisory Council survey of DOD installations and MAJCOMs. The results of the Advisory Council survey, however, were not completed in time for use by the authors (ACHP, 1991a).

The researchers initially anticipated that the base-level Historic Preservation Officer was the most likely natural user of a cultural resources primer. Base Historic Preservation Officers were interviewed by telephone. Among the issues that were normally discussed was the subject of who the primer should be written for. Several of the base staff felt there was a need to educate upper management, as well as provide information for the Historic Preservation Officer.

The 1992 Strategic Planning Conference on Natural and Cultural Resources was held by HQ USAF in March. The objective of the conference "was to develop a long-range plan for managing natural and cultural resources on USAF installations world-wide" (Dept. USAF, 1992b:1). One of the sub-objectives of this conference was to develop a "concept for Air Force Pamphlets to support the [new USAF] regulations" (Dept. USAF, 1984:1). The Cultural Resources Working Group concluded that the cultural resources pamphlet or

instruction "should be written for use by civil engineers and planners as well as for cultural resource managers" (Dept. USAF, 1984:3).

This HQ USAF policy decision identified the target audience for a cultural resources primer. There is no formal connection between the primer that was produced for this research project and the Air Force instructions which will support the new Air Force regulations or directives. However, the subject matter of the primer is closely related to the proposed Air Force Cultural Resource Instruction. The Air Force policy decision also mirrored what the researchers had been told in some of the interviews with base-level staff. Namely, information is needed not only for the Historic Preservation Officer, but management as well.

The target audience was determined to be primarily the base cultural resources manager and civil engineering managers in all areas of the BCP process. The authors assumed that the readers of the primer were professionals in their field, but not necessarily in the field of cultural resources.

Determine Type of Information. The organization and content of the primer was developed through interviews with the base-level and MAJCOM personnel, and an extensive literature review of information on the topic. The recommendations of the expert panel which reviewed the draft outline of the primer and the primer document also significantly shaped the information content of the primer.

A primer based more on reference versus tutorial was determined to be the most appropriate. A "tutorial offers step-by-step training focused on a particular activity," guiding readers through ever step (Price, 1984:53). However, a reference manual "offers procedures that users can apply in many different circumstances, giving exceptions, warnings, asides, and extra data"

(Price, 1984:53). The interviews with base-level staff did not directly reveal the appropriate format for the primer, although several of the individuals who were interviewed preferred a topical format for the primer (Appendix B). Reference materials such as points of contact were located mainly in the appendixes to the primer.

Data Source Analysis. The interview and data collection process pinpointed the primary sources of cultural resource data relevant to the Air Force. Although a massive amount of information was compiled, none of this data provided a single condensed source of information needed by novice personnel charged with satisfying Air Force obligations.

Once the data was compiled, the "matrix approach" (Devereaux, 1988:106) was used to develop a topical outline of the primer subject matter. The process included categorizing all of the data sources that the experts considered official reference material. These data sources included, regulations, directives, preservation law, official publications, training programs, interviews, and other documents concerning cultural resources management . Six separate categories evolved after the data sources were grouped. This process involved numerous subjective decisions on the part of the authors.

The categories of data sources that evolved from this subjective grouping were:

1. Federal Cultural Resource Law/Executive Order
2. Federal Regulations
3. Implementing Agency Publications
4. Training programs
5. DOD Directives/Programs/Regulations/Publications
6. Other sources/Data Bases

Topic Identification. After reviewing all of the data sources, topic areas were identified. This was also a subjective process on the part of the authors. If

the information did not pertain to Air Force cultural resource concerns, it was not included in the data matrix. Once the topic areas were identified, they were then grouped into main headings to allow for ease of placement into separate chapters in the primer. A total of twenty-eight topic areas were originally identified and were subsequently narrowed or grouped into six main headings. Appendix D shows the results of the grouping of the data into headings and sub-headings. These headings were:

1. Introduction
2. Overview of Cultural Resources Management Policy
3. Legislation
4. The Section 106 Process
5. Air Force Cultural Resources Management/Planning Processes
6. How Can You Make This All Work?

The above headings were used for the main headings of the draft topical outline of the primer. See Appendix E for the draft outline of the primer which was developed. This draft outline for the primer, which was essentially a proposed table of contents, was reviewed by the panel of experts.

Determination of the Appropriate Format

The literature review focused on several key areas of concern for the primer format. These areas of concern included: the table of contents, writing style, illustrations, page layout, and general design. The overall construction of the primer had its structural beginnings in the development of the Table of Contents. This structure was used because "people count on your table of contents as an outline of the material, as an indication of what you consider the major and minor topics, and as a map leading them to the information they need" (Price, 1984:65).

Table of Contents. When possible, the headings within chapters of the primer contained verbs. A series of verb phrases can suggest that the primer will help readers do real work, not just learn about a series of subjects. This would be the case if each heading used strictly nouns. Questions were also used minimally to make the headings more interesting. Finally, headings consisting only of key words were avoided (Price, 1984:66).

Within the primer itself, several key ideas were used to make the primer more user-friendly. The literature indicated that our initial page or two should show the readers how to use the manual. "In this way, you advertise the different ways to use you manual and the different entry points" (Price, 1984:68). This section was then coupled with a brief introduction to the primer and explanation on what it can do for the reader.

Writing Styles. Several guidelines for writing sentences within the primer were found. Ritvo and Kearsley state that the "readability of a document that follows these rules will be much higher than one that doesn't" (Ritvo and Kearsley, 1987:118). These general principles for writing sentences include the following:

- Write short sentences.
- Use active voice.
- Use personal pronouns.
- Use action verbs and avoid nouns created from verbs.
- Do not insert excess information into a sentence.
- List conditions separately.
- Avoid multiple negatives.
- Avoid deletion of connecting words.
- Avoid unnecessary and difficult words. (Ritvo and Kearsley, 1987:118)

Research into what was considered a "short sentence" identified a general rule of thumb. The ideal line length is two times the point size. Sentences

which contain 50-70 characters are the most readable (Makuta and Lawrence, 1986:124).

Page Layout. There were several considerations given to the development of the primer page layout. These considerations included: typography, page size, use of columns, justification, placement of illustrations, and placement of page numbers and headers.

Variation in type style and size are valuable for setting headings off from the rest of the document. There were several type styles to choose from, but the majority of the cultural resource documents encountered used Times Roman font. This style or font was selected to be consistent with these other documents. Type style within illustrations used Gill Sans to denote a separation between text and illustration. An importance was also indicated concerning the overuse of highlighting (bold, underlining, italics, capitals) within a document (Freeman and Bacon, 1990:64; Ritvo and Kearsley, 1987:125). "Too much highlighting on the same page tends to cancel out and fails to produce the emphasis intended" (Ritvo and Kearsley, 1987:127).

The page size of the primer was determined by reviewing the data sources and through the interviews. Several of the interviews (Appendix B) indicated an 8 1/2" x 11" document would be of most use. This correlated with the data sources (Appendix C). Most of the cultural resources documents printed by the Advisory Council and the National Park Service are also 8 1/2" x 11" in size with three-ring binder holes punched in the document to allow several documents to be stored together. This format was selected to allow for consistency and better organization with other supplementary material.

The literature on the use of columns indicated the "single most important element of page layout is space" (Ritvo and Kearsley, 1987:126). Ritvo and Kearsley stated

> One of the most common failings of poorly designed documents is the lack of sufficient white space in margins and between [columns or] sections. Without ample white space, a document becomes too dense and difficult to read. Illustrations can be used to produce white space as well as spacing. (Ritvo and Kearsley, 1987:126)

Columns can be used both to improve readability and to create white space. A narrow column can be read quicker than a full page text (Freeman and Bacon, 1990:63). Line widths of five to ten words were used to produce "optimum reading speeds" (Ritvo and Kearsley, 1987:127).

Another decision involved choosing between the use of ragged-right or justified text. Research concerning which of these two to use indicated that ragged-right margins are easier to read. Makuta and Lawrence recommend the use of ragged-right margins. When text is justified on both sides words are often spaced too far apart. This extra space can cause problems with the readers ability to identify words. They also recommended that unless the publishing program being used can handle micro spacing and hyphenation, full-justification should not be used (Makuta and Lawrence, 1986:125). Ragged-right was determined to be the appropriate choice for the primer.

The literature indicated that there are several methods of placing headers and footers. They are used to help the reader keep the "current topic in mind and make it easy to find things when reviewing or browsing" (Ritvo and Kearsley, 1987:129). Often it was found during the literature review that chapter titles were placed in the header with the footer containing the document title and page number. The page numbers/footers and headers are flush right on

a right-hand page and the reverse on a left-hand page (Freeman and Bacon, 1990:66; Ritvo and Kearsley, 1987:128). Although there were deviations found in these guidelines, this was the method selected for the primer because it best fit all of the principles of page layout which were revealed in the literature review.

Illustrations. The literature indicated that illustrations "should be used to show results or relationships in the form of graphs or charts to depict the steps in a procedure, to help explain a concept or process, or to attract attention" (Ritvo and Kearsley, 1987:120). The overall principle of illustration "is to ensure that the illustration helps, not hinders, the reader" (Ritvo and Kearsley, 1987:121). Illustrations of Air Force properties eligible and listed on the National Register were used to show the reader what is considered a eligible property. Other illustrations were used both to attract attention and to help explain concepts and processes.

The placement of the illustrations as well and the headers and footers was a major consideration when the flow of the document was evaluated. The intention of primer's flow was to lead the reader's eye through the document. This was done to alleviate the need for a reader to go back and forth over a page several times in order to process information (Ritvo and Kearsley, 1987:126). A large headline or illustration was placed above or to the right of additional text to be read. Ritvo and Kearsley state that if "the most eye-catching component is at the bottom of the page, it is likely that the reader will not read any of the copy above this component" (Ritvo and Kearsley, 1987:127).

General Design. Several existing Air Force planning documents were reviewed for consistency with the characteristics of format discussed previously. These documents were the Quality of Life Planning Bulletin, Commander's Guide to Environmental Quality, Land Use Planning Bulletin,

Airman Communities, and Area Development Planning Bulletin. Each of these documents used some or all of the format characteristics found in the literature review.

The Quality of Life Planning Bulletin used only a page footer with the page number on the right-hand side of each page. Reading the page number with this format was difficult. Plenty of white space was found on the right-hand side of each page which was used as an area for figures or notes. High-lighting was also kept to a minimum (Dept. USAF, 1989b:1-1 to 4-7).

The Commander's Guide to Environmental Quality used both a header and a footer. The header contained the title of the document as well as the page number. This page numbering system was not as effective as numbering the pages within the footer. The authors found when they were searching for specific pages they used the bottom of the page, which is a natural tendency. However, since the page number was at the top of the page, the search for a specific was often tedious. The general layout of the text and illustrations was well planned and followed the guidelines of format (Dept. USAF, 1991f:1-126).

The Land Use Planning and Area Development Planning bulletins did not use a header or a footer. Only a centered page number at the bottom of the page was used. This made recalling the chapter being reviewed difficult. However, the general layout of the page was well done. Plenty of white space was available for notes and the illustrations were well placed (Dept. USAF, 1986:1-1 to 7-10; Dept. USAF, 1991e:1-1 to 3-62).

The Airman Communities guide contained many of the characteristics which the literature review indicated a good publication should contain. The publication had both a header and a footer. The text was placed on the right hand side of the page leaving lots of white space on the left. Motivational

illustrations and attention notes were placed on the left side of the pages. The overall look of the publication was very professional (Dept. USAF, 1992d).

Each of the documents reviewed were in an 8 1/2" x 11" format. It was the authors opinion that the Area Development Planning Bulletin and the Airmen Communities guide were the most effective. By emulating part of the design aspects of these documents and following the principles of format discussed earlier in this chapter the general design of the primer was developed. Figure 3 indicates the general design used for the primer including pagination, header/footer use, and use of columns. The word processing feature referred to as "facing pages" was also used to allow the page numbers and header/footer schemes to be easily displayed (Jones, 1992:129).

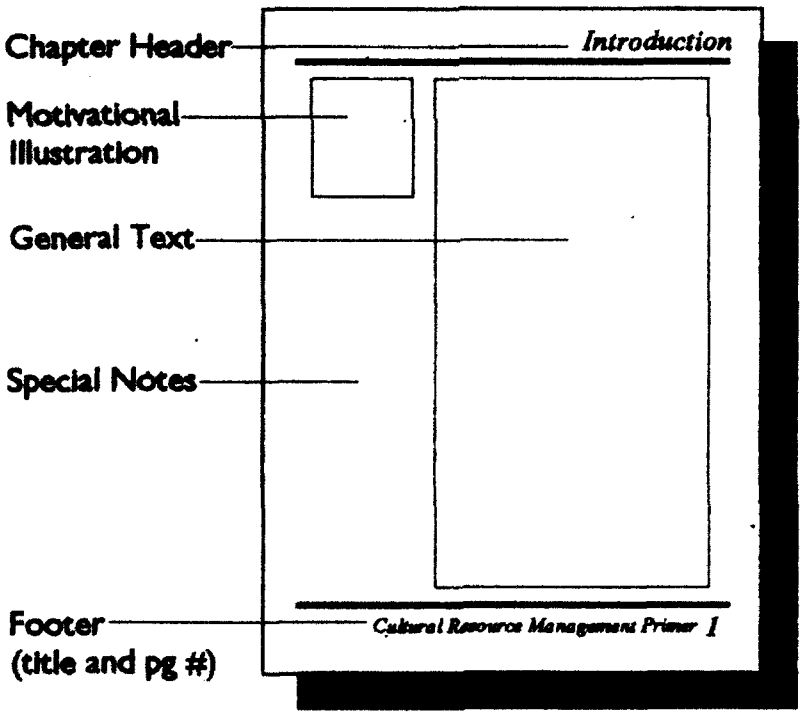


Figure 3. Example of Selected Primer Page Layout

Draft Outline Review

The draft outline of the primer (Appendix E) was sent to each member of the Expert Panel for their review and comments. Written comments were received from most of the panelists. Comments and recommendations were solicited by telephone from the others. Each of the panel experts supplied recommendations for improving the primer outline. Additionally, several of the experts made overall comments on the content of the draft outline. Following are the recommendations from the expert panel review of the proposed topical outline.

Ms. Donna Akers, HQ USAF/CEVP, made a substantial number of comments and additions to the draft outline. She recommended that a "good" executive summary be used as the overall theme of the primer, and that the primer not be too detailed. She also stated that the "outline looked good and [thought] the project will be very useful to the Air Force" (Akers, 1992a). Ms. Akers comments included:

- List the "Penalties for Non-Compliance" section under Chapter 3.0 (Legislation) after the requirements have been given.
- The National Register (The Keeper) should be separate from Chapter 4.0 (The Section 106 Process).
- The Section 106 process should not be covered in the explicit detail in which the draft outline showed.
- The one DOD directive should be added to Chapter 3.0 (Federal Regulations and Executive Order).
- Emphasize section 4.4 (Integrating Section 106 with NEPA (EIAP)).
- Emphasize that Air Force base commanders are ultimately responsible for compliance with the laws and regulations.
- Note the AFCEE and technical assistance roles under section 5.4 (Air Force Support Agencies).
- Include surveys of cultural resources under section 5.7 (Management Tools).
- Include Level One compliance status for cultural resources under the section 5.8 (Funding Issues). (Akers, 1992a)

Dr. Ludlow Clark made a few minor comments about the draft outline, but felt it was "a very nice outline [and] the primer will be very useful for the MAJCOMs and bases" (Clark, 1992c). All of Dr. Clark's comments were additions to the outline. He also made a correction to the title of the primer. He stated the actual title should be "Cultural Resources Management Primer" (Clark, 1992c). The additions suggested by Dr. Clark were:

- Include a brief discussion of some Air Force cultural resources and the cultural resources program under Chapter 2.0.
- Add a section under Chapter 2.0 (Overview of Cultural Resources Management) called "Benefits to the Air Force" which includes:
  - Contributions to base comprehensive planning, architectural compatibility, quality of living and working environments.
  - Helps the base obtain expert assistance form the SHPOs and the National Park Service.
  - Proactive participation avoids project delays, etc.
- Include "Interested Parties" under Section 4.1 (Participants).
- Include other roles that the National Park Service plays in the cultural resources program.
- Mention the Cultural Resources Management Plan in discussion of Section 4.3 (The Programmatic Agreement).
- Move Sections 5.5 (Legacy Program) and 5.6 (Relationship to the Base Comprehensive Plan) to the very end of Chapter 5.0 (Air Force Cultural Resources Management/Planning Processes).
- Emphasize the importance of being proactive and embracing the program as a helpful part of the BCP in Chapter 6.0 (How Can You Make This All Work?).
- Refer to AFR 126-7 in Appendix C (Section 106: Step-By-Step Flowchart). (Clark, 1992c)

Mr. John Cullinane, Senior Architect for The Advisory Council, submitted a few suggestions to make the primer more comprehensive. These suggestions included:

- Include reasons for compliance under Section 2.4 (Penalties for Non-Compliance).

- Include "Interested Parties," such as Native Americans under Section 4.1 (Participants).
- Include "Land Use Surveys," "Geographical Information Systems," and "Computerized Cultural Resources Management Plans" under Section 5.7 (Management Tools).
- Discuss the A-106 process and categorization of projects under Section 5.8 (Funding Issues). (Cullinane, 1992b)

Ms. Lynn Engleman, Chief of HQ AFMC Cultural Resources, stated that "overall [the draft outline] was an excellent and comprehensive outline" (Engleman, 1992b). She made only the following three suggestions to improve the outline:

- Insure that it is known that documents can also be considered a cultural resource and possibly eligible for the National Register.
- Limit the discussion on legislation to the laws the most directly effect the day-to-day activities of a cultural resources manager.
- Include Section 110 responsibilities and its link to Level I compliance status. (Engleman, 1992b)

Dr. Jan Ferguson, Base Historic Preservation Officer, Wright-Patterson AFB, submitted a comprehensive suggestion package with both additions and overall comments. Her comments were submitted in paragraph form. She found the draft outline "to be well-organized and comprehensive" (Ferguson, 1992c). Dr. Ferguson submitted three specific suggestions.

> First, I strongly urge you to explicitly mention Section 110 of the National Historic Preservation Act. It is my professional opinion that this section of the law is just as important as Section 106, and will soon be getting increased regulatory emphasis. It is therefore important that cultural resources staff and players in the base comprehensive planning process be familiar with the term and its requirements. My suggestion would be to introduce Section 110 in Section 3.1 [Relevant Legislation] of the primer and also to somehow tie it in with Chapter 5.0 [Air Force Cultural Resources Management/Planning Processes].
>
> Second, during your explanation of how to assess effects, it will be important to make a clear distinction between "no effect" and "no adverse effect." I would encourage you to include the terms "no effect," "no

adverse effect," and "adverse effect" on the outline at Section 4.2(2) [Assessing Effect], especially if this outline will become the table of contents for the primer.

Finally, I believe the primer will be more "user-friendly" if Appendix B and C are switched, so that the Section 106 flowchart is more immediately accessible. (Ferguson, 1992c)

Major Tom Lillie, Chief of USAF Natural and Cultural Resources Programs, made only two suggestion to the primer outline. These included the addition of "Interested Parties" to Section 4.1 (Participants) and "Appendix F: List of Air Force Properties on the National Register" (Lillie, 1992b).

Mr. William Metz, F.E. Warren AFB, Chief of Environmental Branch, made only two general comments about the primer outline. He felt as a document covering the fundamentals of cultural resources, the outline "pretty well covered the essential topics" (Metz, 1992c). He also felt that even though Chapter 4.0 (The Section 106 Process) covered a vast amount of information for a primer, there was really no way of developing a primer on the subject without that chapter (Metz, 1992c).

Dr. Constance Ramirez, Chief of Army Natural and Cultural Resources, submitted four suggestions to improve the primer:

- Use the "Legacy" definition when defining cultural resources.
- Explain the relation between Section 106 and Section 110 of NHPA, and the relation between NHPA and other cultural resource laws.
- Swap Chapter 5.0 (Air Force Cultural Resources Management/Planning Processes with Chapter 4.0 (The Section 106 Process).
- Show how to integrate cultural resources management with all of the issues covered under Air Force Cultural Resources Management/Planning Processes. (Ramirez, 1992b)

Mr. Larry Spanne, Vandenberg AFB Supervising Archeologist, included four suggestions that were primarily of an archeological nature. These suggestions included:

- Include emergency undertakings and waivers.
- Include contract clauses and construction discovery plans.
- Include Archeological Resources Protection Act [ARPA] permitting and permit waivers.
- Include qualification, report requirements, and curation of artifactual materials and records. (Spanne, 1992c)

During this phase of the research it was discovered that one of the panelists, Donna Akers, was leaving the Air Force for another job. Her draft outline comments were incorporated into final outline, but she was unable to review the final product. The authors felt her input was too valuable to discard even though she was unable to continue as a member of the Expert Panel.

Writing the Primer

With a few exceptions, each of the expert's suggestions were incorporated into the primer. Some of the recommendations were somewhat contradictory. For example, Ms. Akers recommended the primer not be very detailed and essentially comprise an executive summary. Other reviewers, such as Dr. Clark, recommended significant amounts of new material to be added to the document. In addition to changes suggested by the Expert Panel, the draft outline of the primer was modified to incorporate the concepts learned as part of the literature review and to achieve a smooth flow of concepts.

Chapter One of the primer introduced the document to the reader and also provided some historical background information. Chapter Two provided an overview of the management of cultural resources. This chapter functioned more or less as an executive summary. The terminology associated with cultural resource issues is in a state transition. For example, the authors originally started a thesis project dealing with historic preservation and completed one dealing with cultural resources management. The Department of Defense uses

the term "cultural resources" , but the Advisory Council on Historic Preservation does not. To minimize the confusion for the reader, Chapter Two examined the various definitions. As recommended by the Expert Panel, sections covering active Air Force programs and the overall benefit to the Air Force were also included.

Chapter Three consolidated the legal requirements associated with cultural resources management. This included Federal law, as well as Air Force regulations. Many of the base-level staff interviewed as part of this project felt that such a section was particularly important for Air Force management. An attempt was made to keep the listing of Federal law relatively short. The literature review and interviews with the experts identified the most applicable Federal legislation. Air Force regulations were in the process of revision at the time of the writing. The existing regulations and whatever information was known about the replacement regulations were both covered.

Chapter Four covered Air Force management and planning processes. The author's originally intended this information to be covered later in the document, along with a wrap-up chapter which covered working relationships, training and so forth. However, comment from the expert panel favored placement of information on Air Force operations prior to details of compliance with the National Historic Preservation Act. Air Force management tools, such as the base Cultural Resources Management Plan, were discussed in Chapter Four. Cultural resource funding issues and the overall relationship of cultural resources management to the Base Comprehensive Plan were also covered. The last section of the chapter was wrap-up and reminder of problem areas to be avoided.

Chapter Five contained a summary of the processes and requirements for compliance with Section 106 of the National Historic Preservation Act (NHPA). The information in this chapter was drawn largely from training publications from the Advisory Council on Historic Preservation. Members of the expert panel, such as Mr. Metz, recognized that the chapter covering this material was rather long for a primer; however, all of the information was essential.

Several of the experts felt that Section 110 of NHPA was also very important, and would become more important in the future. Chapter Six was added to the primer in an attempt to draw some attention to the issue. The upcoming issue of curation of materials was also covered in this chapter. Coverage of the Legacy program was the last section of Chapter Six. This allowed the document narrative to end with a DOD theme. Legacy could, however, fit well with the other material included in Chapter Four.

The Appendix to the primer contained an extensive compilation of useful information, such as: points of contact, available reference documents, and guidelines for base cultural resources management plans. As recommended by the Expert Panel, a listing of Air Force properties on the National Register of Historic Places was among the data provided.

Validation and Revision Process

The authors furnished a copy of the completed primer, USAF Cultural Resources Management Primer (see Appendix A), to each of the members of the Expert Panel (Table 5) for review and comment. This phase of the research validated the accuracy and usefulness of the primer. All but one of the final Expert Panel responded with either written or verbal comments. Although the overall reaction to the primer was favorable, each of the members suggested

changes to the booklet to so it could be widely disseminated throughout the USAF. Following is a partial compilation of their remarks.

Remarks. Dr. Ludlow Clark, Chief of Cultural and Natural Resources, Air Force Center for Environmental Excellance, Bolling AFB DC, stated that "The Primer is real impressive and alot more than I had expected. This document should be disseminated in the Environmental Planning Course at AFIT after a few stylistic and readability changes are made" (Clark, 1992a). However, he did feel that the authors may have spent too much time on the "cultural resources management" versus "historic preservation" issues than was probably required (Clark, 1992a).

No specific comments were received from Mr. John Cullinane, Senior Architect for the Advisory Council on Historic Preservation, Washington DC. For several weeks the researchers made numerous attempts to communicate with Mr. Cullinane and solicit input. Mr. Cullinane was finally contacted, but was still unable to give the authors any positive or negative feedback (Cullinane, 1992a).

Ms. Lynn Engleman, Chief of HQ AFMC Cultural Resources, Wright-Patterson AFB OH, noted that the Primer is "good and readable, has a nice tone, and is very comprehensive. It is written at a good level. It is very understandable" (Engleman, 1992a). She noted that the document contained lots of good work and that the researchers "did a nice job of synthesizing all aspects of the job, especially for the new person" (Engleman, 1992a). Ms. Engleman also noted that staff, which are new to the cultural resources management field, would find the document helpful. She felt the primer would be a good first document for new staff to read (Engleman, 1992).

In addition to several minor corrections for the document, Ms. Engleman noted that the primer should emphasize the point that cultural resources management is not only the responsibility of the Base Historic Preservation Officer, but there are others at the typical Air Force installation who need to be involved in the process also. Some of the other staff include the base historian, the security police, the Base Civil Engineer, and so forth. Ms. Engleman also provided some additional information related to funding issues, training of staff, assistance available, and the curation of artifacts. This information was included in the primer (Engleman, 1992a).

Dr. Jan Ferguson, Base Historic Preservation Officer, Wright-Patterson AFB OH, completed an extensive review of the document and responed by stating that

> We [2750 ABW/EME] find the primer to be well-written and informative, and expect the cultural resources program managers and staff will find it extremely useful. We commend your efforts in creating the primer and encourage you [the authors] to pursue [in making] the primer available to all Air Force cultural resource program staff. (Ferguson, 1992a)

She did find a few discrepancies in the document. First, she felt that the authors did not clarify that the BHPO is delegated the authority to coordinate with the SHPO. Second, environmental compliance funding priorities had changed since the primer had been drafted. She requested that those issues be updated. Finally, a clarification of the authors discussion regarding Cultural Resources Management Plans (CRMPs) and Programmantic Agreements was needed. She stated that "Typically, an installation prepares a CRMP that gets reviewed and approved by the SHPO and the Advisory Council" (Ferguson, 1992a).

Major Tom Lillie, Chief of Natural and Cultural Resource Programs, HQ USAF/CEVP, Washington DC, felt the primer was a "very good document, with alot of uses from MAJCOM staff, all the way down to the installation user" (Lillie, 1992a). He also stated that he wanted to use the primer as a hand-out at the new USAF Natural and Cultural Resource Management Course the Air Staff had developed. He did request that the authors develop a three to five page stand-alone executive summary for commanders (Lillie, 1992a). The authors were unable to develop this product before the completion of the thesis.

Mr. William Metz, Chief Environmental Branch, FE Warren AFB WY, stated: "In general, I think that the document will be a good contribution to the program. It will provide newcomers to the program with a solid understanding of many of the requirements" (Metz, 1992a). He also supplied several helpful comments from his personal experience. Mainly, he was concerned that the authors were down-playing the extensive amount of work that is required of BHPOs with regard to the new federal curation regulation (Metz, 1992a).

Dr. Constance Ramirez, Army Historic Preservation Officer, Fort Belvoir VA, stated that the "format was very good and user friendly. I would like to use it as a model for other Legacy publications of this type" (Ramirez, 1992a). She did clarify several issues concerning Chapter 1.2 (Historic Perspective). She also requested that the citations be removed before the document was released for better readability (Ramirez, 1992a).

Mr. Larry Spanne, Chief Archeologist, Vandenberg AFB CA, like Mr. Metz, also felt the authors needed to emphasize the new curation regulations (36 CFR Part 79). However, he felt the primer was "very good, and very readable. It is the first thing people who are charged with cultural resources protection should read. It will also be good for a commanders guide, because it explains

the indepthness of the process" (Spanne, 1992a). He recommended that "it would make the primer easier to read if you [authors] would add chapter headings at the beginning of each chapter" (Spanne, 1992a).

Revision Process. Overall the reviewers provided valid and constructive criticisms, and insights toward the primer. While it was unfortunate that Mr. Cullinane's comments were not received, the other Expert Panel members afforded the authors the opportunity to incorporate the significant revisions. Mainly the revisions included the additions of general reference material in the appendices of the primer. Also, the authors corrected several grammatical errors mentioned by the reviewers. No revisions were made to the format or table of contents of the primer, except for the addition of chapter headings, as was suggested by Mr. Spanne. The bibliography of the primer was removed due to the eventual extraction of all citations before disseminating the primer, as was suggested by Dr. Clark and Dr. Ramirez.

While the primer would be useful to cultural resource managers at this time, the authors have noted the ever evolving issues concerning cultural resources. The primer must be updated periodically for it to successfully serve its purpose. The following chapter concludes the research process with a project summary, findings, application of research, and recommendations for further study.

V. Conclusions and Recommendations

Project Summary

The need for the primer was verified in preliminary discussions with high level Air Force personnel responsible for cultural resource issues. The development processes essentially consisted of resolving two research objectives. Those objectives included the identification of the information to be included in the document and, also determining the characteristics of the document which was produced.

Information for the primer was obtained from an extensive literature review, specialized training conducted by the Advisory Council on Historic Preservation, and interviews with those familiar with cultural resource issues, such as base-level staff and MAJCOM staff. Based on an analysis of the collected information, a proposed topical outline for the Air Force primer was developed, and reviewed by the Expert Panel. The completed primer, based upon the revised outline, was reviewed and validated by the Expert Panel.

The interaction with persons working cultural resource issues was invaluable in the development of the primer. The processes of identifying, categorizing and condensing the published information was greatly enhanced by the input received from individuals actually working the issue.

Findings

Everyone who was contacted as part of this research effort expressed support for the development of a cultural resources (historic preservation) primer. Personnel at the base working level, Air Staff, and even those at non-Air Force agencies felt that the project had merit. In addition to providing

information for personnel working cultural resource issues, many of those contacted during the course of this research felt the primer could be a valuable tool to use in educating Air Force base-level leadership on the importance of cultural resources protection.

The information compiled in the primer is a very small fraction of the knowledge that is needed to successfully manage a cultural resource program at an Air Force installation. The primer does, however, provide a starting point from which new personnel can gather the knowledge and skills to do the job right. While the primer provides more detail than base leadership may need, portions of the document can be used to provide an introduction to the issues.

Application of Research

Members of the Expert Panel, which validated the completed document, included numerous positive comments and recommendations relative to the end product. It is the opinion of the researchers that the completed primer can be utilized by the Air Force to increase awareness of cultural resource management issues. The Air Force should publish the primer and distribute it to all of the MAJCOMs, who can then distribute it to all USAF installations. The primer can also be distributed at the new USAF Natural and Cultural Resources Management Course, developed by Air Staff.

The Air Force Institute of Technology, School of Civil Engineering and Services should use the primer, in whole or in part, to augment course material. The primer may have application in courses such as: Comprehensive Planning and Development, Introduction to Environmental Engineering, Architectural Planning, and Environmental Law and Policy.

The primer may also be used by the Air Force to provide the basis for Air Force Instruction 19-70 (AFI 19-70), Cultural Resources Management. Current Air Force Regulations pertaining to cultural resources management and historic preservation are in the process of revision. The new USAF Directive, AFD 19-7 Cultural Resources, will provide very little detail on what base-level personnel need to do in order to ensure compliance with the law and regulations. It is anticipated that a series of Air Force instructions will provide any additional information needed to supplement the new condensed directives (Dept USAF, 1992a). The primer may be used in whole, or in part, for one the Air Force instructions which will supplement AFD 19-7, the Air Force Cultural Resources Directive.

Recommendations for Further Study

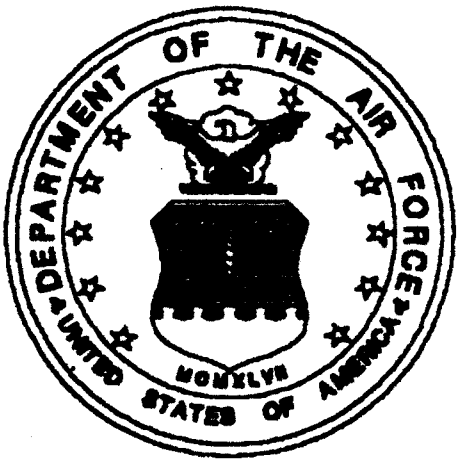
Early on in the investigation it became evident that there does not appear to be a standard way in which Air Force installations deal with cultural resource management issues. Many base-level staff expressed frustration in dealing with internal workings of the Civil Engineering organization. There is little consistency from base to base in the office to which the primary responsibility for cultural resources management responsibility is assigned. In some cases, the base may have a full-time archeologist assigned to the task. In other instances, the responsibility for cultural resources management is delegated as an additional duty.

This diversity in structure can be explained, in part, by the diversity that exists in the physical plant of Air Force installations. Some installations are relatively new, with no apparent need for a program. Other installations have long histories and numerous obvious cultural resources. The appropriateness of

where and how the Air Force makes the assignment of cultural resource management duties at base-level is a topic that merits further study.

The completed primer does not provide base-level staff with all of the information needed to do a proper job of cultural resources management. Provision of explicit technical details on cultural resource management issues was beyond the scope of a primer. However, when an installation is in the process of managing cultural resources, information on exactly how and what work can be accomplished on different types of facilities is important. This information is important not only for Civil Engineering staff, which design projects or provides maintenance, but also for building occupants which attempt self-help work. Further research should be done into the development of historic facility renovation guidelines which are specific to the needs of the Air Force.

Appendix A: Cultural Resources Management Primer



U.S. Air Force Cultural Resources Management
A Manager's Planning Primer

PREPARED BY

Capt. Russell Hula & Mr. Steven Becker
Graduate Students

Air Force Institute of Technology
School of Engineering

July 1992

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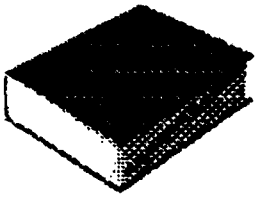
Chapter 1
Introduction

1.1 PURPOSE OF THE PRIMER



This document is intended for anyone who desires information concerning Air Force cultural resource management programs. Commanders, managers, supervisors, and individuals who are responsible for cultural resources will benefit from reading this document.

A primer cannot tell you everything you need to know about cultural resources management in the Air Force, but it does cover the basic elements of the subject. A little knowledge is a dangerous thing. No knowledge, however, is a much worse situation.

This document is intended to provide an introduction to Air Force cultural resources management. It is a handy reference for managers who may not have a need to know all the technical details of the field. Those who work with cultural resource issues on a regular basis will find this document an addition to the other available reference material.

Included in the primer are sections covering relevant legislation related to cultural resource issues. Air Force management processes and suggested methods for facilitating the operations are reviewed. A listing of useful references, sources of additional training, and sample documents are also provided. The three-ring binder format of the primer is designed to allow the addition of documents from the Advisory Council on Historic Preservation (ACHP), National Park Service (NPS), and others.

1.2 HISTORICAL PERSPECTIVE

The War Department was the first federal preservation agency. This mission began in the 1870's when the War Department was given the responsibility for protecting Yellowstone, which was the nation's first national park. The Department of Defense has a long involvement in the preservation of this nation's cultural resources (Metz, undated:3).

Early preservation movements by the public focused on military events or national public figures. In the 1850's Congress was unsuccessfully petitioned to purchase Mount Vernon, the home of George Washington. Some of the first structures to be protected by the government in the mid-1800's included the home of Thomas Jefferson, the residences of Abraham Lincoln, and Independence Hall in Philadelphia (ACHP and GSA, 1991a:II-5).

The 1870's and 1880's saw significant efforts to preserve battlefields from the Civil War and also the Revolutionary War. The Casa Grande archeological ruins in Arizona received federal protection in 1889. The Antiquities Act of 1906 was one of the first measures designed to protect historic properties located on federal land. The War Department managed the historically significant sites including battlefields, national cemeteries, and national parks, until the responsibility was turned over to the National Park Service in the 1930's (Neumann and others, 1991:5).

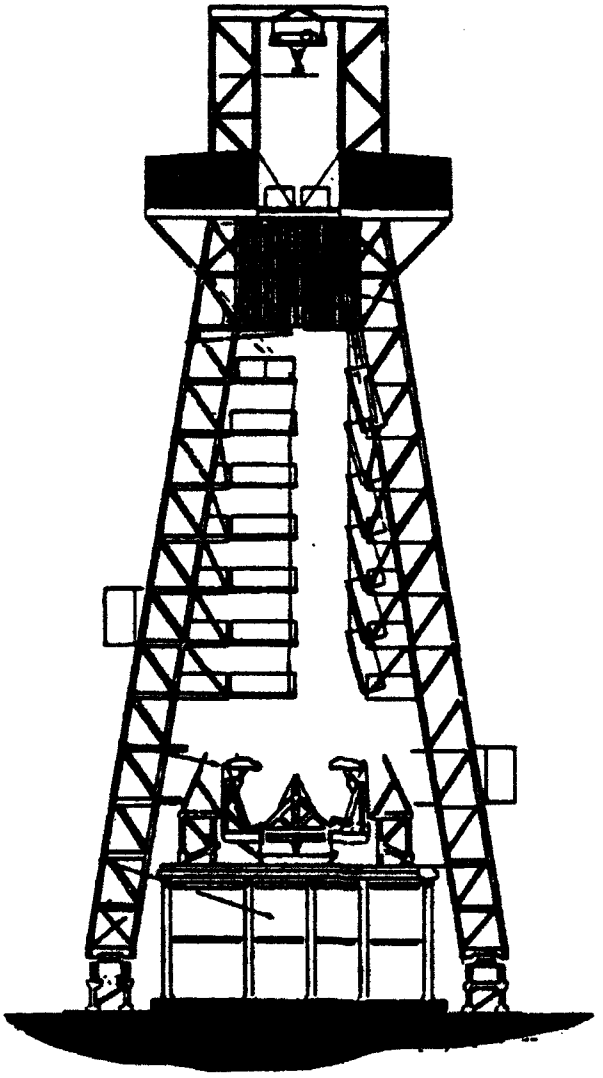
The Historic Sites Act of 1935 authorized the Department of Interior to survey sites and acquire historic properties. This effort was the first national survey of the Nation's cultural resources. By the 1960's, however, a large portion of the cultural resources that had been surveyed no longer existed due to new construction and other reasons such as neglect. (Ferguson, 1992e:1).

Current cultural resource protection law is most attributable to the massive federal infrastructure building programs of the 50's and 60's, and also the Nation's growing environmental awareness. During the decades following World War II the federal government funded projects for dams, highways, and housing. These projects

were often completed with little regard for cultural resources. The National Historic Preservation Act of 1966 was passed to address those concerns (ACHP and GSA, 1991a:II-5). The underlying philosophy for cultural resources management is that historic resources are irreplaceable and have value to both the scientific community and the general public.

Some of the reasons for managing and preservation of properties include; knowing and understanding our past, providing inspiration for future generations, recognition and commemoration of past events or persons, and providing a sense of roots and identity. The opening section of the National Historic Preservation Act states that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people" (ACHP and GSA, 1991a:II-6).

FE Warren AFB, Fort David A. Russell National Historic Landmark, Officer Quarters



Cape Canaveral, Complex 14 National Historic Landmark, Atlas Service Tower

Chapter 2
Overview of Cultural Resources Management

2.1 WHAT IS CULTURAL RESOURCES MANAGEMENT

Cultural Resources Management can mean many things to many people. The Air Force uses the term to describe a program that locates, identifies, evaluates, and manages all evidence of human activity within a given area. Human activity has produced a lot of material remains over the thousands of years that people have been in the world. Much of this material can tell us something about the people that produced it (Metz, undated:3).

National Register of Historic Places. . .

In order to recognize those items that are considered significant, Congress has established the National Register of Historic Places. Specific criteria have been established to define what properties are significant to be placed on the National Register. Cultural Resource Managers use the eligibility criteria to evaluate the significance of particular properties. **See Chapter 5.4 for eligibility critieria** (Metz, undated:3). It is national policy to preserve properties that are eligible for the National Register whenever possible. Archeological sites may be preserved by avoidance of the site. Historic buildings may be rehabilitated and modified for reuse. Structures and objects can often be set aside for interpretive purposes (Metz, undated:3).

If a property is eligible for the National Register, the property is afforded protection under the law. It is best to avoid modification of a cultural resource, such as a historic building. This does not mean, however, that the property can never be altered or even destroyed. Properties are significant for different reasons. As long as the elements of the property which make it significant are protected, there is flexibility in managing the resource (Metz, undated:3).

2.2 DEFINING CULTURAL RESOURCES

Cultural Resources Management or Historic Preservation

The draft Air Force Directive 19-7 defines cultural resources as "all historic structures, sites, objects, archaeological sites, districts, traditional sites, and folkways on Air Force lands that are of local and/or national significance" (Dept USAF, 1992a:2).

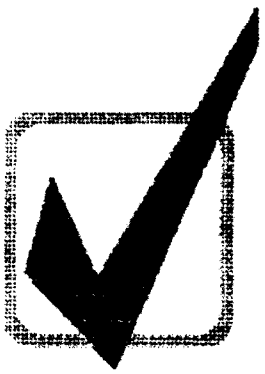
Use of the term "cultural resources management" within the USAF is relatively new. The old (existing) US Air Force Regulation dealing with the issue is titled "Historic Preservation." The new replacement Air Force regulation dealing with the same issues is titled "Cultural Resources Management."

The Deputy Assistant Secretary of Defense for the Environment stated in the September 1991 Legacy Report to Congress: "Cultural resources are archeological and architectural resources. For archeology, it includes, but is not limited to, traditions, lifeways, cultural and religious practices, and other institutions to which a community, neighborhood, Native American tribe, or other group ascribes cultural significance, together with any artifacts and real property associated with such elements. For architecture, it includes, but is not limited to, buildings, sites, districts, structures, or objects, landscapes, and vistas. In addition, the term encompasses historic documents and relics " (DOD, 1991:156).

Be aware that the same terms are not universally applied within the Federal government. Many agencies use the term "historic resource" or historic preservation. "Historic preservation" is the term used in the National Historic Preservation Act of 1966 (NHPA) and encompasses those historic properties that are eligible for the National Register according to NHPA (Fink, 1992).

DOD Term . . . "Cultural resources management" is the term of choice currently used by both the Department of Defense and the Air Force to encompass all resources in which a federal agency holds public trust according to all laws such as NHPA, Native American Graves Protection and Repatriation Act (NAGPRA), Archeological Resources Protection Act (ARPA), and the National Environmental Policy Act (NEPA). The resource does not necessarily need to be eligible for the National Register to be a cultural resource (Ramirez, 1992c).

Cultural resources management and historic preservation are essentially the same thing. It may be necessary, however, to watch the semantics when dealing with non-DOD agencies.



2.3 IMPLEMENTING AIR FORCE GOALS AND POLICY

Proper attention to the environment today will ensure that the Air Force can perform its mission in the future. General Merrill McPeak, Chief of Staff for the US Air Force, expects the Air Force to lead the Department of Defense in environmental protection and compliance. The following are five goals the Air Force has adopted (McPeak, 1991) :

- Restore at least 10% of Air Force hazardous waste sites annually, with all sites completed by 2000.
- Ensure present Air Force operations comply with all federal, state, and local environmental standards.
- Prevent future pollution by reducing the generation of hazardous waste to as near zero as feasible.
- Use the Environmental Impact Analysis Process to support decision making and to protect the environment.
- Protect and enhance our natural resources, including wetlands, historic sites, and endangered species through sound stewardship and management.

Several of the above stated goals have a direct application to management of Air Force cultural resources. It is Air Force policy to comply with federal, state, and local law. This includes cultural resource protection law. Protecting and enhancing Air Force historic sites is specifically mentioned. Finally, planning for the protection and enhancement of cultural resources should be a normal part of the Air Force decision making processes under the Environmental Impact and Analysis Process (EIAP).

As stated in Air Force regulations, it is the policy of the Air Force to inventory, evaluate, and protect cultural resources found on Air Force lands in a manner which is consistent with the national policies. The purpose of Air Force policy is to ensure sound management practices of cultural resources on Air Force lands (Dept USAF, 1992a:1).

2.4 BENEFITS TO THE AIR FORCE

The Congress and the President have made it clear that they expect all federal land managers to be leaders in the stewardship of our heritage. States and cities are also enacting legislation to protect both prehistoric and historic sites (Metz, undated:2).

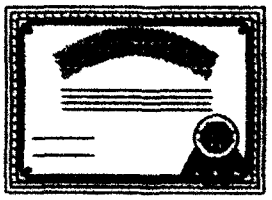
The Air Force controls approximately 10.7 million acres of land. As a land manager, the Air Force makes decisions on road alignments, cable trenches, and other activities that may alter a significant cultural property. Even on recently established bases, the Air Force may operate over a legacy of thousands of years of history, in many cases, without even knowing it. Prehistoric sites may lie undisturbed, next to modern facilities (McDermon, 1992; Metz, undated). The Air Force has approximately 800 million square feet of buildings, and 140,000 family housing units. Some of these facilities are architecturally significant. Other facilities are significant for their vital roles in the defense of the nation, development of flight, or space travel (McDermon, 1992).

Commanders and managers make daily decisions that enhance, jeopardize, or destroy cultural resources that are important to the understanding of our history. An active, vigorous cultural resources management program will help ensure that those decisions accommodate cultural resource requirements (Metz, undated).

Proactive Program . . .

A proactive cultural resources management program will ensure that mission essential projects are not delayed by non-compliance with legal requirements. More importantly, a vigorous cultural resources management program will contirbute to the quality of life on the Air Force installation.

2.5 SUCCESSFUL BASE-LEVEL PROGRAMS



The Air Force has many successful cultural resource management programs. The size and scope of the program varies from installation to installation. The following are just a few of the many Air Force success stories.

F. E. Warren AFB, Wyoming

This base has a very active cultural resources management program. The installation has been given awards from both the Air Force and non-Air Force agencies, including the National Trust for Historic Preservation.

Architectural Compatibility . . .

Much of F. E. Warren AFB dates back to frontier days. In addition to the renovation and restoration of historic facilities, the base has adopted architectural compatibility guidelines which integrate new construction with the historic facilities (Clark, 1992b).

One project, which is part of the DOD Legacy Resources Management Program (Legacy), included the stabilization of an archeological site near a camping area. The Legacy is a Congressionally directed program developed to enhance the management of DOD natural and cultural resources. The project also involved the provision of interpretive signs to educate the public on the significance of the site. Additionally the base is establishing a prototype regional Air Force curation facility. This facility will serve as a regional repository for Air Force artifacts and records (DOD, 1991:45,70).

Wright-Patterson AFB, Ohio

Consideration of cultural resource issues was an important factor in the design and siting of new facilities for the Aeronautical Systems Center (ASC) at Wright-Patterson AFB. Initial plans called for the demolition of numerous old buildings. These old facilities, however, were determined to have significant historical connections with the development of aviation (Ferguson, 1992b).

The base was able to accommodate both mission requirements: (1) new facilities and (2) historic preservation of an important part of our aviation heritage. After consideration of several alternatives, the revised plan, ASC Tomorrow, calls for building a new complex of buildings on an inactive portion of the flight line. The new complex will be compatible with adjacent existing historic facilities.

The planning efforts not only accommodated cultural resource concerns, it resulted in proposed facilities which met all mission requirements and were more attractive and functional than the original proposals. The base received the USAF Thomas D. White award for its various historic preservation/cultural resource programs (Clark, 1992b).

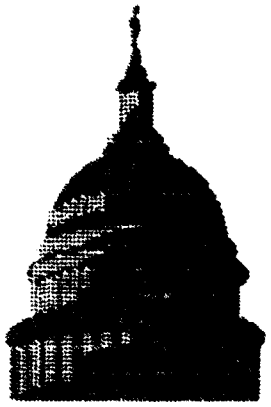
Wright-Patterson AFB is also in the process of completing an extensive Legacy project to enhance the Huffman Prairie Flying Field National Historic Landmark. This was the site where the Wright brothers perfected their understanding and control of flight aerodynamics. The Wright Brothers also operated one of the first schools of aviation at the Huffman Flying Field (DOD, 1991:37).

Vandenberg AFB, California

The most recent winner of the Thomas D. White cultural resources management award is Vandenberg AFB. One of the many notable things at this base is the cooperative relationship that has been established with Native American groups. This large base has areas that are traditionally important to Native Americans. Portions of the base also contain Native American burial sites (Clark, 1992b).

It is a policy of the Native AmericanGraves Protection and Repatriation Act to consult with the tribal representatives. On large scale construction projects Air Force contractors are required to retain a tribal representative on the site. This representation expedites the recovery process, helps avoid costly construction delays, and contributes to the working relationship between the Air Force and the tribe (Dept USAF, 1992a; Spanne, 1992b).

Chapter 3
Complying With The Law



3.1 FEDERAL LAW

Federal involvement in historic preservation did not start in earnest until the turn of the century. The Antiquities Act of 1906 (P.L. 59-209) was one of the first measures designed to protect historic properties located on federal lands. The act authorized the President to declare areas of public lands as National Monuments or accept private land for that purpose. The Antiquities Act also required permits for the removal of any items of antiquity, referred to today as cultural resources, from federal land (NPS, 1989:32; Smith and McManamon, 1988:5).

In 1935 the Historic Sites Act (P.L. 74-292) was passed. This legislation made it national policy to restore, reconstruct, preserve and maintain sites, buildings and objects of national historical or archeological significance for public use and the benefit of the people. Subsequently, the National Park Service, as lead agency, established the Historic American Building Survey, the Historic Sites Survey, the National Historic Landmarks Program, and subsequently the Historic American Engineering Record (NPS, 1989:2; Grosser, 1991:10).

The legislation that most directly impacts the operations of the Air Force was first passed in the 1966. In the last couple of decades, Congress has enacted additional legislation and amended older laws several times.

Most Significant Legislation . . .

NHPA - National Historic Preservation Act of 1966 as amended (P.L.89-665,96-515; 16 USC 470 et seq)

The National Historic Preservation Act (NHPA) is the most significant legislation passed. The National Historic Preservation Act expresses a general policy of supporting and encouraging the preservation of prehistoric and historic resources for present and

future generations. Congress has subsequently amended the original legislation to strengthen it (NPS, 1989:5; Smith, 1988:6).

The National Historic Preservation Act directs federal agencies to assume responsibility for considering cultural resources in their activities. The Act broadens federal cultural resources preservation policy by encouraging state and local governments, and also individuals, to preserve archeological or historic resources of national, state, or local importance (Dean, 1988:1-5).

The Act provides for an expanded National Register of Historic Places and establishes the Advisory Council on Historic Preservation. Federal agency responsibilities are outlined in four sections of NHPA. Section 106 and Section 110 are the most important for the typical Air Force installation.

Although Section 106 comes before 110 within the legislation, Section 110 is the "proactive" approach toward cultural resources management (CRM), while Section 106 is the "reactive" approach to CRM. Section 110 lays out affirmative agency responsibilities for an inventory and evaluation of resources. Section 106 requires consultation with other agencies and consideration of potential effects on historic resources during specific projects or undertakings (Smith, 1988:6).

Section 110 a Proactive Approach . . .

The focus of Section 110 is long range planning and resource management. Federal agencies are directed to provide leadership in preserving, restoring, and maintaining the historic and cultural environment of the nation. Agencies are required to administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations (Grosser, 1991:12).

Section 110 of the National Historic Preservation Act requires federal agencies to develop programs to inventory and evaluate historic resources. Agencies are responsible for the preservation of properties which they own or control. There is an affirmative responsibility to identify and nominate qualifying properties to the National Register of Historic Places. The law also requires that historic properties available to the agency be used to the maximum extent possible, prior to constructing new facilities for carrying out the mission of the agency (ACHP and GSA, 1991a:II-8).

Section 106 a Reactive Approach . . .

Section 106 requires that federal agencies consider the effects of their projects on historic properties and seek comment from the Advisory Council on Historic Preservation. The Advisory Council must be given the opportunity to comment on any undertaking of a federal agency that may affect any district, site, building, structure or object included on the National Register or eligible to be included on the National Register. See Chapter 5.2 for further information (Grosser, 1991:11).

The purpose of Section 106 is to avoid unnecessary harm to historic properties from federal actions. Two important concepts to grasp are: (1) take into account effects of undertakings on historic properties on or eligible for listing on the National Register and (2) allow Advisory Council comment. The Section 106 process is explored in more detail in Chapter 5.0.

NEPA - National Environmental Policy Act of 1969
(P.L. 91-190, 42 USC 4321-4327)

This is the legislation that gave us the Environmental Impact Statement (EIS) and the Environmental Analysis (EA). The National Environmental Policy Act (NEPA) states that the impact of any federal undertaking on the historic and cultural environment must be included in the environmental impact assessment process. The National Environmental Policy Act also notes that it is the responsibility of the Federal Government to preserve important historic, cultural, and natural aspects of our national heritage (NPS, 1989:56; Grosser, 1991:12).

NEPA/NHPA Integration . . .

To some extent, NEPA and NHPA both address the same concerns. Both consider the impact of projects of historic properties. However, the NEPA and the NHPA are separate laws. Complying with one law does not necessarily mean compliance with the other (ACHP and GSA, 1991a:II-13).

The documentation prepared for NEPA compliance can very often be used for the NHPA coordination process. However, the NHPA may require coordination on projects which do not require any action under the NEPA (Ferguson, 1992e:3).

Archeological and Historic Preservation Act of 1974
(P.L. 93-291, 16 USC 469-469c)

May require additional compliance beyond NHPA

This legislation requires federal agencies to notify the Secretary of the Interior when they find that a construction project or other activity may cause irreparable loss or destruction of significant scientific, prehistoric, historical, or archeological data. The Archeological and Historic Preservation Act (AHPA) also allows agencies to use project funds (1%, or more with special approval) for data recovery activities. Data recovery activities must meet specified requirements (NPS, 1989:33; Dept. USAF, 1991d:5-5).

This Act is not designed as a substitute for agency compliance responsibilities under the NHPA or the NEPA. The NHPA provides for recovery of data which would otherwise be lost as a result of agencies' activities. In cases of unexpected late discovery during the course of a construction project or other operations, NHPA provides for expedited procedures for notification (Grosser, 1991:1-10).

Public Buildings Cooperative Use Act of 1976
(P.L. 94-541, 40 USC 490,601a,606,611,612a)

This legislation encourages the adaptive reuse of historical buildings for federal agencies (NPS, 1989:60; Dept. USAF, 1991d:5-5).

AIRFA - American Indian Religious Freedom Act of 1978
(P.L. 95-341, 42 USC 1996)

Native American Rights . . .

The American Indian Religious Freedon Act (AIRFA) makes it the policy of the Federal Government to protect and preserve for Native Americans their right to believe, express, and exercise their traditional religions. These rights include access to sites, if any, that may be on Air Force installations (Smith, 1988:7). The Air Force must determine whether or not any Native American groups have an interest in the installation properties. The Native American community must be consulted if there is potential damage to sacred areas, trails, or properties This consultation can be coordinated with the NHPA Section 106 process (Grosser, 1991:13).

ARPA - Archeological Resources Protection Act of 1979
(P.L. 96-95, 16 USC 470aa-470ll)

The Archeological Resources Protection Act (ARPA) was originally passed to protect sites on federal land that were being damaged by vandals or others plundering a site. The Act was subsequently amended, most recently in 1988. The law makes it illegal to remove from federal or Indian land any archeological resources without a permit from the land manager (NPS, 1989:36; Smith, 1988:8).

Permits may be issued only to educational, scientific institutions, or individuals, and then only if the resulting activities will increase knowledge about archeological resources. A primary purpose of the law is to increase the exchange of information and general communication between governmental agencies, professional archeologists, and the public. Note that the coordination required as part of the NHPA Section 106 process is not the same as ARPA (Carnett, 1991:3).

Section 14 of ARPA requires that the Secretary of Defense develop plans for surveying lands under the control of DOD (and other federal agencies) to determine the nature and extent of archeological resources which are present. Agencies are tasked with preparing a schedule for surveying those lands which are most likely to contain the most scientifically valuable resources and to also develop documentation for reporting suspected violations (Dept. USAF, 1991d:5-5). Archeological and historic materials are protected government property. It is illegal to allow anyone to collect artifacts on the Air Force installation, unless the Air Force issues a permit through the ARPA process. Air Force contractors, which are performing cultural resource investigations, will normally qualify for a waiver of the permitting requirements (Dept. USAF, 1992a; Spanne, 1992b).

Native American Graves Protection & Repatriation Act of 1990 (P.L. 101-601)

The Native American Graves Protection and Repatriation Act (NAGPRA) requires federal agencies to inventory human remains, funerary objects, sacred objects, and objects of cultural patrimony

they own or control. Native Americans must be given the opportunity to reclaim these cultural items. NAGPRA also encourages the avoidance of archeological sites that contain burials. Consultations and archeological investigations should be completed prior to undertaking any activity which will disturb sites. If a site is discovered during construction, the activity must stop (Grosser, 1991:14).

Legacy Program

Congress established the DOD Legacy Resources Management Program in 1991. Through the Legacy Program, DOD can take a proactive approach toward planning and management of natural and cultural resources. The ultimate goal is to develop and facilitate the implementation of enhancements to DOD's management of natural and cultural resources through leadership, partnership and stewardship (DOD, 1991:19,154).

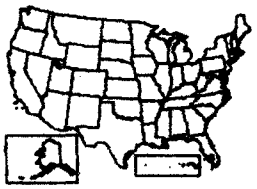
Federal Regulations

Federal law relating to cultural resources management is implemented via regulations promulgated by the responsible federal agency. The federal regulations have the same force as law. For example, 36 CFR Part 800 is the Advisory Council regulation which covers protection of historic properties (ACHP and GSA, 1991b:II-1;II-75). The following is a list of some of the most relevant regulations governing cultural resource issues:

36 CFR Part 800: Protection of Historic Properties
36 CFR Part 60: National Register of Historic Places
36 CFR Part 78: Waiver of Federal Agency Responsibilites
43 CFR Part 7: Protection of Archaeological Resources
36 CFR Part 79: Curation of Federally Owned and Administered Archeological Collections

The recent regulation, Curation of Federally-Owned and Administered Archeological Collections (36 CFR Part 79), requires federal agencies to preserve, collections of prehistoric materials, historic materials, and records recovered in conjunction with archeological projects and programs. The materials must be made available for study and public interpretation (NPS, 1991c).

3.2 STATE LAW



State law relating to the preservation of cultural and historic resources will vary from location to location. This is a matter that you need to investigate for your installation. There may be state guidance on the interaction with local community interests, curatorship of artifacts, or addressing Native American issues.

The State Historic Preservation Officer (SHPO) is the state regulatory agency in charge of cultural resource compliance matters. There might also be a state archeologist who may give guidance on archeological matters in each respective state. These agencies will not always be located in the same office. Chapter 4.0 covers matters concerning the SHPO in more detail.

3.3 DOD DIRECTIVE

DOD Instruction 4710.1 established the policy that all Department of Defense components will integrate the application of archeological and historic preservation laws with the planning and management of activities under DOD control (Dept. USAF, 1991d:6).

3.4 AIR FORCE REGULATIONS

Air Force regulations are currently in the process of revision. Regulations relating to environmental topics, such as cultural resources management, will be part of the environmental quality regulation framework and will be called Air Force "directives." New Air Force directives will be relatively short, compared to existing documents and will focus on policy. Specific program procedures will be contained in Air Force "instructions," which will supplement the directives (Lillie, 1992a).

AFR 126-7, Historic Preservation

This regulation, dated 28 August 1987, outlines many of the steps to be taken to comply with the National Historic Preservation Act (NHPA) Section 106 coordination process. The regulation also assigns responsibilities, explains terms, provides background information, and so forth.

Air Force Policy . . .

Per AFR 126-7, Air Force policy for historic preservation is :

- to inventory, evaluate, and protect historic resources located on lands controlled by the Air Force.
- to identify and nominate to the National Register all eligible historic resources on Air Force lands.
- to cooperate with federal, state, and local agencies; Indian tribes; and the public in managing cultural resources.
- to integrate historic preservation requirements with planning and management of other activities, and to consider historic resources during the earliest stages of project planning so as to reduce conflicts with the military mission and other management objectives.
- to maintain historic resources and promote adaptive reuse when feasible.
- to recognize the rights of American Indians to have access to certain religious sites and objects under Air Force control within the limits of the military installation.

AFD 19-7, Cultural Resources Management

This draft directive is the anticipated replacement for AFR 126-7. Keeping in line with Air Force policy on new directives, the new Cultural Resources Management directive, AFD 19-7, is significantly shorter than its predecessor. The required implementing procedures for AFD 19-7 will be contained in Air

Force Instructions (AFI) which supplement the directive. Draft AFD 19-7, states that it is the policy of the Air Force to inventory, maintain, and manage the cultural resources found on Air Force installations in a manner which is consistent with the national defense mission (Dept. USAF, 1992a).

The directive requires each Air Force installation to prepare and adopt a Cultural Resources Management Plan. This plan will include an inventory of all cultural resources on the installation and management techniques for protecting and preserving those resources. The Cultural Resources Management Plan (CRMP) is a component part of the installation Base Comprehensive Plan (Dept. USAF, 1992a).

AFR 86-4, Base Comprehensive Planning

This regulation is also currently in the process of revision and replacement. The Air Force Base Comprehensive Planning process identifies long-term goals and priorities for the installation. The planning processes address the natural, physical, and cultural environments.

The Base Comprehensive Plan (BCP) is both a process and a product. Visible products of the Base Comprehensive Plan are the set of maps and planning narrative documents. The BCP maps and documents are maintained by the Civil Engineering community planner. The Base Comprehensive Plan is made up of many component plans, including the Cultural Resources Management Plan. Historic preservation issues are addressed as part of the Natural Resources component plan (McDermon, 1992).

AFD 19-2, Planning

Air Force Directive 19-2 will to be the new Air Force planning directive. Base comprehensive planning will be included in the planning directive. Air Force Instruction (AFI) 19-24 is will provide the implementing program procedures for base comprehensive planning.

3.5 AVOIDING NON-COMPLIANCE

It is our Nation's policy to protect and preserve cultural resources. Federal law, Federal regulations, DOD directives, Air Force policy, and Air Force directives all reflect the nation's desire to preserve our heritage. Some Air Force commanders and managers may feel that cultural resources protection is not a requirement at their installation because the base infrastructure is relatively new. However, until a survey has been completed, and reviewed/signed by the State Historic Preservation Officer (SHPO), that base is out of compliance. (Akers, 1992a). A recent study by the Advisory Council found that many newer, highly technical or scientific facilities are equally eligible for listing in the National Register of Historic Places as older properties (ACHP, 1991b).

If some Air Force commanders, managers, and staff are not sufficiently motivated to protect cultural resources by a sense of history and good conscience, then the mandates of the law provide justification for doing so. While the enforcement provisions of some the legislation are relatively benign, other statues carry specific penalties.

For example, violations of the Archeological Resources Protection Act can result in fines of up $250,000 and up to five years imprisonment (Carnett, 1991:2). Non-compliance with the National Historic Preservation Act is often dealt with administratively by respective agency heads (ACHP and GSA, 1992). Non-compliance with cultural resource protection requirements may also leave the Air Force vulnerable to civil suits. Long delays of construction projects or other work are possible due to court injuctions and temporary restraining orders. Failure to meet cultural resource protection requirements will also more than likely result in adverse publicity for the Air Force (ACHP and GSA, 1992).

Non-compliance can also occur if effects of an undertaking on any district, site, building, structure, or object that is included or eligible for inclusion in the National Register, are not taken into account. The Advisory Council must also be afforded a reasonable opportunity to comment on the undertaking (NPS, 1989:5).

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Chapter 4
Cultural Resources Management/Planning Processes

4.1 BASE-LEVEL STAFF

The Air Force installation commander is responsible for ensuring compliance with existing cultural resource management legislation, regulations, and Air Force directives. The Commander is responsible for coordination with the State Historic Preservation Officer (SHPO) on all Air Force projects effecting cultural resources. Commanders are also responsible for appropriate funding, staffing, and compliance requirements of base cultural resources management programs (Dept. USAF, 1992a).

Commanders will normally choose to delegate the coordination with SHPO to the Base Historic Preservation Officer. AFR 126-7 and the new AFD 19-7 require Air Force installation commanders appoint a designated Base Historic Preservation Officer (BHPO) to be the single point of contact for all cultural resources management actions. This appointment may be either a full-time or additional duty, depending on the extent of cultural resources at that installation. Personnel who spend at least 50% of their time performing cultural resource duties must be permanently assigned and coded with one of the environmental compliance cost centers (Dept. USAF, 1992c).

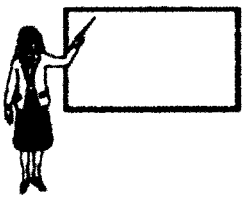
Installation commanders are ultimately responsible for compliance.

Within the new Civil Engineering Objective Squadron concept, the BHPO will normally be placed within the Environmental Flight. However, some bases have elected to place this position within the Engineering Flight. At Air Force Material Command (AFMC) bases the BHPO is part of the Environmental Management (EM) branch.

It is very important that cultural resource issues be considered early in the planning and programming of installation construction activities. AF Form 332s and DD Form 1391s should be reviewed for potential impact. Self-help projects or work orders may potentially cause problems if precautions for proper review are not taken.

The BHPO is the single point of contact for all cultural resources management actions. However, there are lots of players involved in the management of cultural resources. Cultural resources management is not just a Civil Engineering program, or only the BHPO's program. The base historian, the Environmental Protection Committee (EPC), the Facilities Board (FB), the base architect, and other personnel working planning issues all have roles in making cultural resources management decisions. Security police may be involved in monitoring base archeological sites for vandalism. Cultural resource management involves everyone. (Engleman, 1992a).

4.2 WHERE TO GET TRAINING



In addition to the Base Historic Preservation Officer, facility designers, maintenance personnel, and legal staff may all need training. While the Air Force has not established formal training standards for the BHPO, a few of the training courses discussed in this section have been accepted by the DOD community as a minimum basis for a successful program (Engleman, 1992a).

Several organizations exist for the purpose of conducting cultural resources training. The cost of the training is funded by the base. In some cases, environmental compliance funding may be used. Courses are conducted by the Advisory Council and GSA, the National Park Service, several universities, and numerous other organizations. The courses are also both management and technically based. Several other courses exist for training in specific areas. Contact the NPS (see Appendix C) for a current copy of the Directory of Training Opportunities in Cultural Resources Management. (NPS, 1991a; ACHP and GSA, 1992).

Management Training

Recommended Courses . . .

The **Introduction To Federal Projects and Historic Preservation Law** is a 3-day course offered fourteen times a year throughout the country. This course was developed by the Advisory Council and the GSA for federal agencies. The course covers the requirements of Sections 106 and 110 of NHPA. A workbook and desk reference are included in the price of the course and are valuable assets for cultural resource managers. Contact the Advisory Council for more information (Appendix C).

The newly developed **Air Force Management of Cultural and Natural Resources** is a 4-day course. This course was developed by the Air Staff for the entire DOD as a part of the Legacy Program. The course will cover case studies, compliance, budget procedures, contractors, and areas of program enhancement. Contact your MAJCOM for further information (See Appendix C).

The **Archeology For Managers** is a 4-day course given twice a year by the National Park Service and the University of Nevada-Reno. This course was developed for cultural resource managers who do not necessarily have any background in archeology but who must manage archeological resources. Legal requirements, policies, guidelines and regulations concerning archeological preservation are covered along with the appropriate methods for resource management during the course. Field sessions at actual archeological sites are included in the training. Contact the National Park Service-Archeological Assistance Division for further information (see Appendix C).

Technical Training

The **Historical Structures: Maintenance and Repair** course was developed by the Seattle District, Corps of Engineers. This course covers procedures for maintenance design, management and treatment of historic structures. Design issues include: exterior finishes, interiors, energy conservation, engineering support systems, site landscaping, and material life-cycle costs. Contact the Seattle District COE for further information (see Appendix C) (Foxall, 1992).

4.3 WHERE TO GET ASSISTANCE

There are several entities that are readily available to give base-level personnel assistance in cultural resource. The first source of information is each respective MAJCOM. The Air Staff (HQ USAF/CEVP) is an additional source for policy-type information. Professional and technical information can be found at the Air Force Center for Environmental Excellence (AFCEE), Army Corps of Engineers, and National Park Service. The SHPO may also have the time and resources to give assistance to an installation (See Appendix C).

Major Commands (MAJCOMs)

Major Commands, such as Air Combat Command, are "responsible for monitoring compliance with regulations, legislation, and Air Force directives, and ensuring installation development of Cultural Resource Plans. MAJCOMs are also responsible for the review of management plans and for consolidation of cultural resources budgets" (Dept. USAF, 1992a).

The MAJCOM can provide valuable assistance to the Base Historic Preservation Officer. The MAJCOM is also the focal point for funding requirements, prioritizing A-106, and compliance status of cultural resource projects. The BHPO should periodically contact the MAJCOM counterpart to stay abreast of current topics concerning cultural resources.

Air Staff (HQ USAF/CEVP)

HQ USAF/CEVP "is responsible for policy guidance, oversight, and funding advocacy for the Cultural Resources Management Program, and will monitor progress toward achieving cultural resource management goals" (Dept. USAF, 1992a).

Air Force Center for Environmental Excellence

The AFCEE, at Brooks AFB, is "responsible for assistance in interagency and intergovernmental coordination, for keeping MAJCOMs informed on regional cultural and historic resources

issues, and for providing legal advice on cultural and historic resources issues" (Dept. USAF, 1992a). The AFCEE will provide a BHPO a source for both management and technical information.

Army Corps of Engineers

The Army Corps of Engineers (COE) supplies three main sources of cultural resource assistance. These include the Tri-Services Cultural Resource Research Center (TSCRRC) at the US. Army Construction Engineering Research Laboratory (USACERL), Seattle District Historic Building Preservation Services. See Appendix C for addresses and telephone numbers.

Tri-Services Cultural Resource Research Center

One-Stop Source . . .

The TSCRRC, located at the University of Illinois at Urbana-Champaign, is staffed by research professionals representing a wide range of disciplines, including: archeologists, architects, historians, materials scientists, engineers, and computer scientists. The TSCRRC can assist Air Force installations in completing cultural resource surveys and developing Cultural Resources Management Plans and computer databases for maintaining information on cultural resources. These compliance requirements can also be completed by the TSCRRC on a reimbursable basis and often at a much more affordable cost than contracted services (Dept. Army, 1992).

Numerous Air Force installations contain large areas of land that have not been disturbed for years. The TSCRRC can locate these sites and complete the sampling, excavating, and cataloging required by Section 106 and 110 of NHPA. The TSCRRC can also develop databases on historic properties, including World War II temporary structures and Cold War facilities. Other services supplied include: baseline inventory, evaluation, condition assessment, and stabilization (Dept. Army, 1992).

Wright-Patterson AFB utilized the TSCRRC for developing its Cultural Resources Management Plan and conducting an archeological and historic architecture study. Included with the professional support supplied by the TSCRRC are automated support tools (Ferguson, 1992d). The Geographic Resources

Analysis Support System (GRASS) generates a data set of environmental attributes; the Cultural Resources Information System (CRIS), a DOS-based system that allows cultural resource managers to input, edit, store, compare, analyze, and output data on cultural resources.

The computer tools supplied with the cost of TSCRRC's professional assistance allow Base Historic Preservation Officers and other cultural resource managers to keep a current resource inventory and refine probability models of archeological distributions on the installation (Dept. Army, 1992).

TSCCRC also maintains the Cultural Resources Bulletin Board (CRIBB), which is a knowledge-based tool for enhancing communications among DOD personnel and educational institutions who are concerned with preserving cultural resources. The system contains listings of experts, cultural resource personnel at each installation, and recommended training courses; call-in information services, and other unpublished documents. The CRIBB can be accessed by obtaining a log-on through the ETIS Support Center at 217-333-1369, and using almost any computer equipped with a telephone and modem. A User's Guide for the CRIBB may be obtained through the USACERL office (see Appendix C)(Mann and others, 1987).

Seattle District Historic Building Preservation Services

The Seattle District can provide technical, planning, and management assistance in the preservation of historic structures. Included in this assistance, the Seattle District can help in developing criteria for the design, construction and procurement of contracts for maintenance and rehabilitation of historic structures. The Seattle District can also aid in developing maintenance plans for historic buildings along with several other capabilities.

Assistance can be requested from the Seattle District by sending a letter to the District Engineer of the Seattle District at the address shown in Appendix C. The letter should contain a brief description of the project type, nature, size, and the time requirements of the problem or need. Also include a description of the type of service

or product you would like the Seattle District to provide (Dept. Army, 1991).

Respective COE or NAVFAC Districts

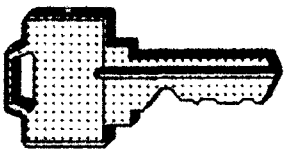
The COE or NAVFAC District which acts as the design agent for an Air Force installation may also be contacted for professional and technical assistance. Each district has different levels of expertise and capabilities. The local district agencies can also assist in developing contracts for cultural resource requirements (Ferguson, 1992d).

The National Park Service (NPS)

The NPS can provide professional and technical assistance for Air Force installation cultural resources management, planning, and training, subject to the availability of NPS resources. Included in this support is the development of comprehensive installation cultural resource inventory and registration programs, guidelines for historic preservation planning, and Cultural Resources Management Plans (CRMP). The NPS can also provide assistance in the development and administration of cultural resource program contracts, make training available in planning and technical applications, and provide consultation on technical preservation problems (Dept. USAF and NPS, 1992). All assistance will be funded by the installation on a reimbursable basis. Requests for installation-specific project assistance must be made through MAJCOM coordinators.

4.4 WORKING WITH SHPO

Responsibilities of the SHPO



The State Historic Preservation Officer (SHPO) plays an important role in the development of programs. The SHPO is a key player in activities relating to Section 106 of the National Historic Preservation Act (NHPA).

The actual placement of the SHPO within the state government will vary (see Appendix C). The SHPO may be part of the state historical society, state archives, state park agency, or state natural resources agency (ACHP and GSA, 1991a:II-16).

The SHPO performs a variety of duties under the terms of NHPA, state law, and other authorities. The SHPO serves as the central information source for preservation activities conducted in the state. It is responsible for statewide historic preservation planning and a statewide inventory of historic properties. The SHPO assists in the nomination of properties to the National Register of Historic Places. The SHPO also administers grants in aid within the state, and provides public information, education, training and technical assistance. (ACHP and GSA, 1991b:IV-49).

Key Regulatory Agency . . .

It is the SHPO's responsibility to ensure the preservation of historic properties in the state. The regulations which govern the NHPA, 36 CFR 800, require the participation of the SHPO in the Section 106 process. For instance, the regulations outline participation by the SHPO during the identification and evaluation of properties, determination of any effects, consultations, and Advisory Council comment (ACHP and GSA, 1991b:IV-52).

There are two functions of the SHPO that are of particular interest to Air Force installations. First, the SHPO participates in the review of undertakings (construction projects, maintenance activities, etc.) that may affect Air Force cultural resources (historic properties). Additionally, the SHPO provides technical assistance to federal agencies, such as the Air Force (ACHP and GSA, 1991a:II-17). The SHPO also reviews Cultural Resources Management Plans, agreement documents, and other activites that relate to Section 106 and 110 of NHPA.

Philosophical Approaches

Management of Air Force cultural resources will require working with the SHPO. This working relationship should be a good one. Taking a proactive approach to the issues at hand can help make the process smoother, whether working with SHPO, or any regulatory agency. The proactive approach requires commanders to allocate sufficient personnel and provide adequate training to

allow the Air Force to help drive the process, rather than only react to the regulator (Clark, 1992b; ACHP and GSA, 1992).

Start Early . . .

The regulations governing the consultation process do set some time limits for action by the SHPO. Most actions are allowed a 30 day period. However, there usually is no advantage to waiting until the last opportunity or deadline before contacting the SHPO.

The SHPO should not be viewed as an adversary. It is better to view the SHPO as a resource. When conducting a consultation or negotiation with the SHPO, the situation should be viewed from the "we are going to solve a problem" perspective, rather than from the "we are going to defend a position" point of view (ACHP and GSA, 1992).

The process of making the determination of whether or not a property is eligible for the National Register of Historic Places is an area of potential dispute between Air Force staff and the State Historic Preservation Officer. Of course, any such dispute can be resolved by seeking a determination from the Keeper of the Register, whose decision is final (ACHP and GSA, 1992).

Single Base Point of Contact

Official correspondence with the SHPO will be signed by the installation commander, unless the authority is delegated to a lower level or even the BHPO. This processes usually necessitates coordination through the chain of command, the legal office, and so forth. However, the responsibility for working the base cultural resource management program on a day to day basis is the BHPO (Dept. USAF, 1992a:3).

It is strongly advised that a single base point of contact with the SHPO be established. The Base Historic Preservation Officer is a logical choice to serve as that contact. While the involvement of others such as the base Environmental Protection Committee, the base historian, unit commanders, or officers wives club is important, and in fact necessary, the effort needs to be coordinated. Most SHPOs are understaffed. Receipt of multiple inquiries or conflicting information from organizations representing the Air Force installation will only serve to cloud the process. (ACHP and GSA, 1992).

4.5 MANAGEMENT TOOLS

The are several existing management tools that provide a Base Historic Preservation Officer or other cultural resources management personnel the opportunity to enhance their program. A few of these tools include: the Cultural Resources Management Plan (CRMP), Environmental Compliance Assessment Management Program (ECAMP), Work Information Management System-Environmental Subsystem (WIMS-ES), land-use condition surveys, and Geographical Information Systems (GIS).

Cultural Resources Management Plan (CRMP)

Both AFR 126-7 and the new AFR 19-7 (Cultural Resources Management) require each Air Force installation to develop and maintain a CRMP. The CRMP, if done properly, can help facilitate Section 106 and 110 requirements of NHPA. A Programmatic Agreement can also be one of several beneficial outcomes of the CRMP. See Chapter 5.6 for further information concerning Programmatic Agreements.

Although no required guidance exists for the format of the CRMP, two outlines are available for installation use. HQ USAF/CEV developed a guideline for the preparation of the CRMP in a 25 April 1991 letter to all MAJCOMs. Army Regulation 420-40 contains an outline for a CRMP that has been used by Wright-Patterson AFB with success.

Since no specific requirements exist, great flexibility is afforded to the development of the CRMP. The use of a short Programmatic Agreement adopting the plan is the simplest way to formalize the CRMP. Once the CRMP is formalized, it can serve as the guidance for how the installation accomplishes its Section 106 and 110 responsibilites. As noted earlier, the Corps of Engineers and the National Park Service can assist in the development of the CRMP (Dept. USAF 1991c; Ferguson, 1992c; Metz, 1992d).

Environmental Compliance Assessment Management Program (ECAMP)

Air Force regulations requires that an Environmental Compliance Assessment and Management Program (ECAMP) be implemented at each Air Force installation. Assessment protocols have been developed by HQ USAF/CE which serve as the primary tool in conducting the environmental compliance evaluation phase of the ECAMP process.

Two types of evaluations are used in the ECAMP process. **Internal** audits conducted annually by installation personnel and **external** audits conducted every three years by personnel not directly associated with the installation. If internal audits are properly conducted and the problems corrected, regulatory enforcement actions or private sector lawsuits can be minimized (Dept. USAF, 1991f:21).

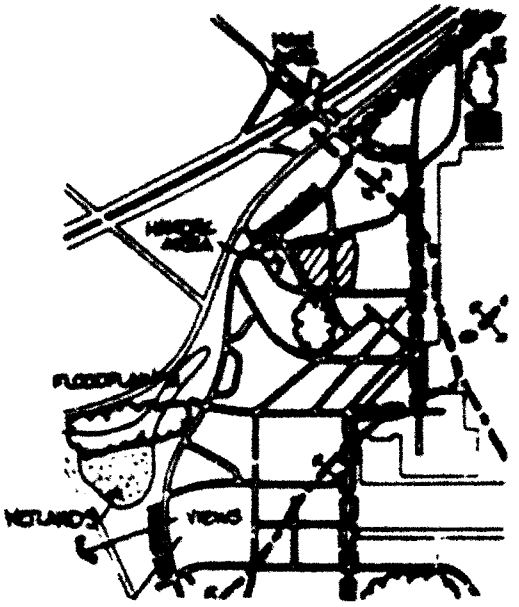
The Natural and Cultural Resources Management Program is covered by Volume V of the ECAMP protocol manual. This protocol compiles applicable Federal, DOD, and Air Force environmental regulations with Air Force operations and activities. It also combines environmental regulations, good management practices, and risk management issues into checklists. These checklists serve as an outline and can be modified to best serve each specific installation (Dept. USAF, 1991d:1.1).

Work Information Management System-Environmental Subsystem (WIMS-ES)

The WIMS-ES is intended to improve mission support by providing the base environmental manager a management information system that contains essential information, automates mandatory reports, and maintains comprehensive data files on environmental programs (Dept. USAF, 1991a). "Modules" or screens were developed for each program area within the environmental arena to simplify the A-106 process. Each WIMS terminal will eventually have access to the A-106 modules.

The primary purpose of the A-106 Federal Facility Environmental Needs System is to ensure that federal agencies are planning,

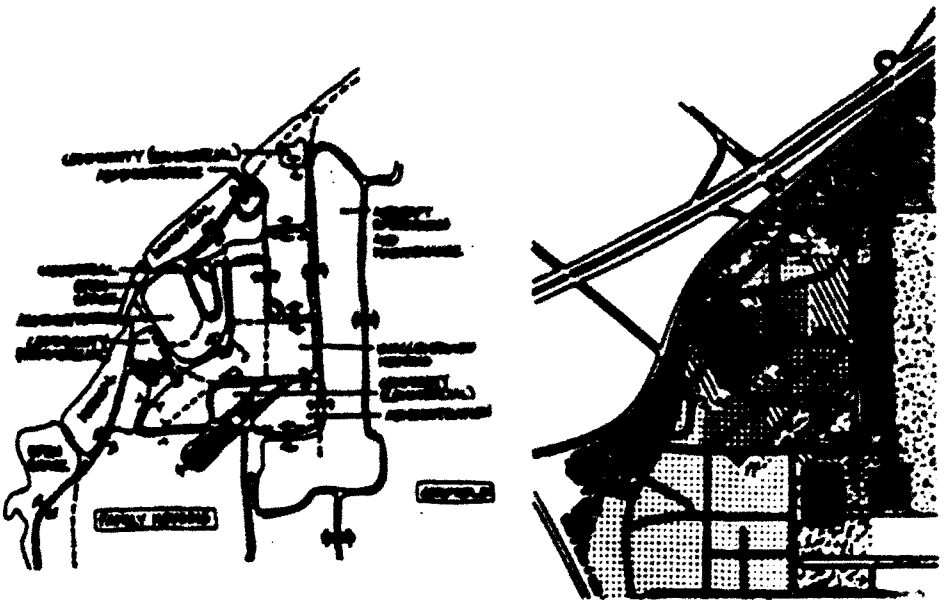
installation. An analysis of the existing cultural resources during this phase of the process will lead to an understanding of the physical and natural variations across the installation and the limitations they may impose on a Land-Use Plan.



Base Analysis Drawing (Dept. USAF, 1986)

The next step in the Land-Use process involves a "functional analysis" of the installation. A functional analysis serves to illustrate, through notes and sketches, the functional relationships among the various activities on the base. This step is important in the fact that links between cultural resources and the surrounding environment can be modeled on paper for the final development of the Land-Use Plan. In this way, future adverse effects on historic properties can be avoided in the planning stage. However, if effects are unavoidable, the Land-Use Plan will serve as an effective decision-making tool for the Base Historic Preservation Officer and the SHPO (Dept. USAF, 1986).

The 1986 Air Force Land-Use Planning Bulletin should be referred to for further information. Contact you MAJCOM for a copy of this document.



Functional Analysis Drawing and Land-Use Plan
(Dept. USAF, 1986)

Geographical Information System (GIS)

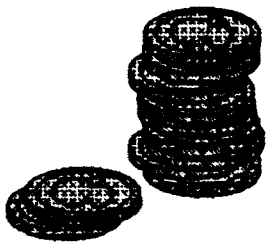
A GIS is a computer system capable of holding and using data describing geographical referenced information. The GIS can be used as an analysis tool which allows the user to identify spatial relationships, compute new information, and display a desired view, all based on a database of geographic information. Note that a GIS and a CAD system are not the same thing. At this time, true GIS systems in the Air Force are limited (Tobin, 1992).

The Corps of Engineers and the Tri-Services Cultural Resources Research Center (TSCRRC) use the Geographic Resources Analysis Support System (GRASS) for cultural resources management. The TSCRRC uses GRASS when performing the preliminary analysis for Cultural Resources Management Plans. The TSCRRC can be contacted for further information concerning GRASS (see Appendix C).

HQ USAF/CE implements the official policy concerning automated information management systems. However, the Air

Force Civil Engineering and Support Agency (AFCESA) at Tyndall AFB, FL has been delegated the authority to make policy in this area. The AFCESA should be contacted for current information concerning the acquisition of a GIS system for your base and specific requirements (See Appendix C)(Tobin, 1992).

4.6 FUNDING ISSUES AND THE A-106 PROCESS



As with any other funding programs, cultural resource compliance funding requirements must be included in the DOD Planning, Programming, and Budgeting System (PPBS). Section 110 of NHPA allows for the inclusion of preservation activities on eligible properties as project costs. As such, program requirements should be prioritized into compliance categories. Air Force Pamphlet 19-10 covers the details of the budgeting process (Dept. USAF, 1991f:27).

Cultural resources requirements cannot be funded through the Defense Environmental Restoration Account (DERA). The two main avenues toward funding cultural resources requirements are Environmental Compliance (EC) Funds and Military Construction (MILCON) Funding (Dept. USAF, 1991f:27; Dept. USAF, 1992c:1).

Environmental Compliance (EC) Funds

Cultural Resources EC funds are divided into two main types and are intended to be used for current environmental activities. These two types include:

- Recurring Environmental Operations and Services (O&S).
- Non-recurring environmental contract services and facility projects.

  - Level I Fix Noncompliance
  - Level II Prevent Noncompliance
  - Level III Beyond Compliance

Environmental Operation and Services include recurring "must pay" requirements necessary for those associated with day-to-day operations which are needed to "keep the door open." Environmental compliance manpower, NHPA Section 106 consultations, permits and fees, and curation of archeological material make-up these "must pay" requirements (Dept. USAF, 1992c:1).

Non-recurring environmental contract services and facility projects such as the development of the Base Cultural Resources Management Plan (CRMP) and recurring historic facility rehabilitation projects make-up the other type of EC funding needs that must compete with all other programs in the budget process (Dept. USAF, 1992c:2).

Military Construction (MILCON) Funding

Major construction projects, such as building new facilities in a historic district, are funded under the MILCON program process. This process can be long and complex, hence requirements should be anticipated, clearly defined, and well-documented. Coordination with all of the key players is very important with any MILCON project; however, a MILCON project involving cultural resources must also be coordinated with the additional players such as the SHPO, Advisory Council, and interested parties (Dept. USAF, 1991f:29).

A-106 Prioritization (WIMS-ES)

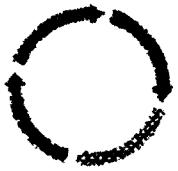
The primary tool used to prioritize cultural resources funding requirements is the A-106 (WIMS-ES) process. The Office of Management and Budget (OMB) has developed the A-106 process for reporting and tracking budget requirements for all environmental projects, including cultural resources. The A-106 process and report identifies projects which are divided into three classes based on their priority with respect to environmental compliance. These classes include levels I, II, and III (Dept. USAF, 1991f:19).

Cultural resources compliance requirements will be included as either Level I, II, or III. Level I (fix noncompliance) includes non-

recurring projects and services that address requirements needed to get into compliance with existing regulations (Section 110 requirement). At this time, only the performance of archeological and historical resource inventories, development of historic facility nominations, and recurring protection efforts for archeological resources and resulting agreements/management plans are considered Level I compliance requirements. Level II compliance requirements include the inventory of collections or control over holdings of Native American human remains and associated funeral objects, including the identification of geographical and cultural affiliation of such items (Dept. USAF, 1992c:2).

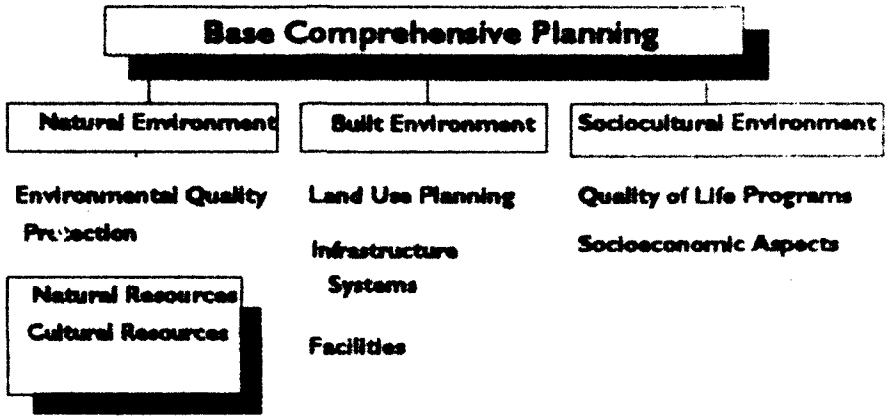
Other cultural resources projects which are not tied to imminent compliance deadlines are considered Level III (Environmental Investment) projects. Cultural Resources Management projects such as interpretive displays, informational brochures, and public awareness programs are considered Level III projects (Dept. USAF, 1992c:3).

4.7 RELATIONSHIP TO THE BASE COMPREHENSIVE PLAN (BCP)



The overall objective of the Base Comprehensive Plan (BCP) is to Provide the commander and other decision makers with information necessary to:

- Effectively manage limited resources.
- Guide future development of the base.
- Foster coordination, consistency, compatibility between Air Force activities and surrounding communities. (Dept. USAF, 1990)



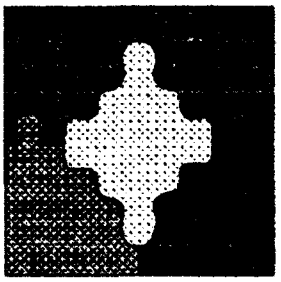
The Cultural Resources Management Plan is an integral part of the BCP. Tab A of the BCP includes the Natural Resources Plan which also includes the Cultural Resources Plan. However, all other components of the BCP such as the Land Use Plan (Tab D), Facility Development Plans (Tabs K-N), and Environmental Quality Protection Plan (Tab B) affect the development of the Cultural Resources Management Plan (Dept. USAF, 1990).

HQ USAF has developed guidance to standardize the development of the BCP and its various components. This guidance includes, but not limited to the BCP Regulation (AFR 86-4), BCP Bulletin (AFM 86-6), BCP Master Statement of Work (AFM 86-9), BCP Digital Mapping Standard, and the new Planning Directive (AFD 19-2) and subsequent Instructions.

The Air Force Standard Specification Manual (SSM) for Digital Base Comprehensive Plan Mapping contains two volumes: Volume I (Databases) and Volume II (Symbology). Section 4 of Volume II includes Natural/Cultural Resources Constraints Data (Dept. USAF, 1990).

The integration of the Cultural Resources Management Plan into the BCP is a continuing process that allows the base to fulfill its mission with its physical, sociological, economic and ecological environment. This integration will also help facilitate the specific requirements of the cultural resources legislation and regulations.

4.8 MINIMIZING PROBLEMS



Know What You Have

Completing a survey, inventory and evaluation of the installations cultural resources is the most important step in the management of the installation's cultural resources. Section 110 of NHPA outlines affirmative responsibilities to locate, inventory, and nominate properties which appear eligible for the National Register of Historic Places. See Chapter 5.2 for eligibility criteria (ACHP and GSA, 1991a:II-9).

Coordinated Position

Historic preservation and cultural resource protection is a topic in which many people take an interest. That is good. However, when it comes to dealing with the regulatory agencies, the Air Force installation needs to speak with one voice. Installation cultural resource protection efforts should be coordinated through the Base Historic Preservation Officer. A lot of confusion can be avoided if the base uses a single point of contact when dealing with outside agencies.

Coordinating Construction

Well-intentioned contract projects for maintenance of existing facilities, or construction of new facilities may inadvertently cause harm to cultural resources. For example, replacement of windows in a historic facility may damage some of the characteristics that qualified the facility for protection under the National Historic Preservation Act. A new building may destroy an archeological site before valuable data can be recovered.

Systems need to be in place to ensure that the effects on cultural resources are properly considered. AF Form 332, DD Form 1391, or AF Form 813 may be used to that end. Utilization of the WIMS-ES will also help direct Air Force efforts. In any event, planning for the extra time it takes to coordinate work on historic facilities will do a lot to alleviate problems.

Managing Maintenance

Many of the same concerns relating to Air Force construction activities are applicable to in-house maintenance operations. Workman and planners need to be aware of the special requirements associated with historic facilities. If work on the facility is not covered as part of a Programmatic Agreement, the time delay required for the consultation process will need to be considered. Several courses are available in the NPS Directory of Training Opportunities in Cultural Resources Management for training specifically designed for craftsmen and planners (see Appendix E).

Supervising Self-Help

Self-help projects can sometimes result in interesting facility maintenance problems. Occupant education and control of the self-help work, which is allowed, can reduce future maintenance headaches. The same is true for avoiding non-compliance with NHPA as a result of self-help work in a facility. One way to minimize problems with self-help work is by preparing occupant brochures, which outline the work that is permitted in the facility. However, until a programmatic memorandum of agreement covering the facility is executed, the Section 106 consultation process applies.

Offutt AFB, Fort Crook Historic District, Senior Officer Quarters 13

Chapter 5
Working With Section 106 of NHPA

The preservation of all historic properties is not the purpose of federal preservation law. Preservation concerns are weighted along with other interests. All kinds of properties are considered including historic structures, historic districts, historic objects, archeological sites, and traditional cultural properties. The level of significance might be national, state, or local (ACHP and GSA, 1991a:II-3).

The process of weighing/balancing the needs of the federal agency and the needs of preservation are done in accordance with clear, well-defined processes. Section 106 of the National Historic Preservation Act requires federal agencies to take into account the effects of their activities and programs on historic properties. Federal agencies are required to give the Advisory Council on Historic Preservation the opportunity to comment on their proposed undertaking. Advisory Council on Historic Preservation regulation "Protection of Historic Properties" (36 CFR Part 800) delineates the process to be used. The process can take a lot of time. It is important to provide an early opportunity for comment by all interested parties (ACHP and GSA, 1991a:II-11).

5.1 PARTICIPANTS

The Air Force

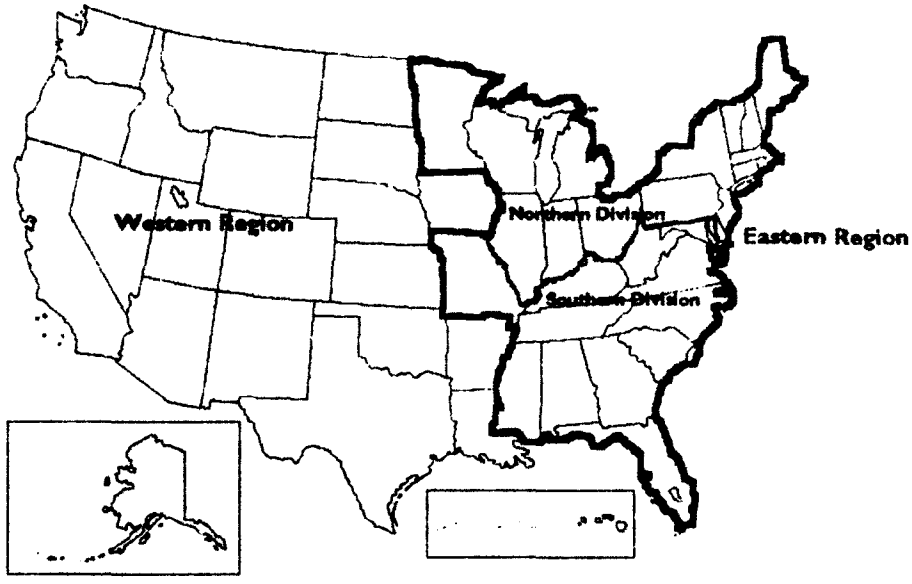
The Air Force is the responsible federal agency for actions that occur on its installations. Coordination with other participants in the processes will be handled primarily at the Air Force installation level. MAJCOM, and possibly Air Staff, involvement can certainly be a part of the process.

The responsible federal agency (Air Force), ultimately, has the decision making authority with regard to preservation issues. Other participants in the process do not grant "approvals" or "clearances" for Air Force action. However, Air Force decisions need to be made in consultation with other interested parties.

The Advisory Council on Historic Preservation

This 19-member council was established by the National Historic Preservation Act. Members are appointed by the President. The Secretary of Defense has observer status on the Council. The Council is charged with advising Congress, the President, and federal agencies on preservation issues, and encouraging private and public interest in preservation. The day to day business of the Advisory Council is conducted by an executive director and a professional staff (Dept. USAF, 1991d:8; Metz, undated:4).

The Advisory Council professional staff operates from two locations. The office which services the eastern portion of the country is located in Washington, DC. The western regional office is located in Golden, Colorado. The following map shows regional coverage. See Appendix C for further information.



Advisory Council Regional Offices (ACHP and GSA, 1991a)

The Advisory Council monitors how well federal agencies comply with NHPA and comments on federal agency actions under Section 106. The Council also acts as an arbitrator between the State Historic Preservation Offices (SHPO) and federal agencies during Section 106 review disputes (Ferguson, 1992e:3).

State Historic Preservation Office (SHPO)

The NHPA required each governor to designate a State Historic Preservation Officer, who administers the compliance with historic preservation legislation. The SHPO is supported by federal funding, and its authority extends over Air Force installations. The SHPO maintains a list of historic properties in the state (Metz, undated:4).

Work with SHPO . . .

Air Force installations must consult with the SHPO as part of the Section 106 process. Agencies seek the views of the SHPO while identifying historic properties and assessing the effects of actions on those properties. The SHPO is essentially a consultant. The wishes of the SHPO do not need to be automatically followed. However, unless the federal agency can provide convincing evidence, the Advisory Council will side with the determinations of the SHPO in the event of a dispute with the federal agency (Metz, undated: 4; ACHP and GSA, 1992).

National Park Service

The National Park Service is extensively involved in the historic preservation process. The Park Service establishes standards and guidelines for all aspects of historic preservation. This includes standards for any work to be done on a listed or eligible property. The Park Service (The Keeper) also makes final determinations of whether a property is eligible for listing on the National Register of Historic Places. The National Register listing includes districts, sites, buildings, structures, and objects of national, state, or local significance (Dept. USAF, 1991d:11). See earlier sections on the technical support services which can be obtained from the NPS.

Interested Parties

The Air Force must make reasonable efforts to involve local interested parties in the process. This may be a group, such as a veterans organization that has an association with base facilities, or individuals in the community.

Native Americans

It is especially important to involve Native Americans in the process. When a project affects properties that are of cultural value to an Indian tribe, the tribe is an interested party whose views need to be considered. In addition to tribal governmental officials, other "traditional cultural leaders" need to represented in the process. If a tribe has its own proceedures for dealing with historic properties, those proceedures should be integrated into the Section 106 process (ACHP and GSA, 1991a:II-20).

The Air Force has been a leader among federal agencies with regard to consultation wtih Native American groups. The past work of the now dissolved AFRCE-BMS/DEV, as part of the Peacekeeper program, is one noteworthy sucess. Air Force guidelines for consultation with Native Americans are available from HQ USAF/CEVP (Dept. USAF, 1991b).

5.2 IDENTIFYING and EVALUATING PROPERTIES

An important point to remember regarding the NHPA Section 106 process is that historic properties are those that are listed on the National Register of Historic Places, and also those properties that are eligible for listing. Thus, the law provides protection not only to listed properties, but also to properties which have not been evaluated.

National Register of Historic Places

This is a listing of districts, sites, buildings, structures, and objects of national, state, or local significance in American history,.

architecture, archeology, or culture. The register is maintained by the Keeper of the National Register through the National Park Service. A property is included on the Register if it has been formally nominated by the USAF to the National Register and accepted by the Keeper. Decisions on eligibility by the Keeper are final. A property is eligible for inclusion in the Register if it meets the National Register criteria (ACHP and GSA, 1991a:II-28).

National Register Criteria

Types of Properties. There are five types of properties that are eligible for listing on the Register (ACHP and GSA, 1991b: II-23):

- buildings or structures created to shelter any form of human activity, such as a house, barn, school, hotel, or similar structure. A building may be a historically related complex such as a court house and jail, or house and barn.

- structures made for purposes other than shelter, such as bridges, highways, and canals. It is often a large scale engineering project.

- sites mark the location of significant events, a prehistoric activity, or historic occupation whether standing ,ruined or vanished, such as archeological sites, Indian sites, battlefields, or shipwrecks. The location itself maintains historical or archeological value.

- objects is a material thing of aesthetic, cultural, historical, functional, or scientific value. It may be movable, or small in scale. Examples include memorials, ships, or machinery.

- districts are geographically definable areas which possess a historically linked group of buildings, structures, objects, or sites, such as rural villages or commercial areas.

Levels of Significance. A property may be significant and eligible for the National Register on any of three levels (ACHP and GSA, 1991a:II-30):

- national
- state
- local

Criteria For Evaluation. There are four criteria which can qualify a property for listing on the National Register. A property must satisfy one or more of the following (ACHP and GSA, 1991b:II-26):

- association with **events** that have made a significant contribution to the broad patterns of American history, such as a battlefield or building.
- association with the **lives** of people significant in our past, such as the home of George Washington.
- **distinctive characteristics** of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction.
- **data**; have yielded or may be likely to yield information important to prehistory or history, as is the case on archeological sites.

Is it Historic or just old?

Integrity. Integrity is critical to application of National Register criteria for eligibility. Integrity is evaluated in terms of what makes a property significant. Not all aspects are relevant for each property. However, there must be enough of a preservable entity to communicate the relative significance of the property. In addition to other items, a property must also have integrity of (ACHP and GSA, 1991a:II-30) :

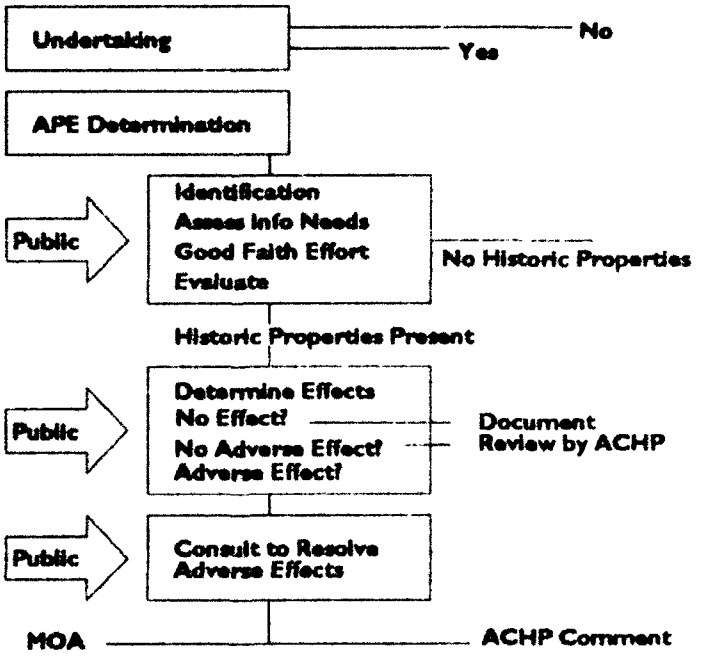
- location
- setting
- workmanship
- association
- design
- materials
- feeling

Exclusions and Exceptions. The applicable regulations list several categories of properties that are not normally eligible for listing on the National Register, such as cemeteries. One exclusion that is of particular interest is the age limitation.

Properties, which are less than 50 years old, are normally not eligible for consideration for the National Register of Historic Places. This qualification may significantly reduce the number of properties which must be considered at many Air Force installations. However, the 50 year age exclusion is not absolute. Properties may still be part of a historic district (ACHP and GSA, 1991b:II-29).

50 Year Rule . . .

Additionally, there are provisions for listing properties which have achieved significance within the last 50 years. The launch sites associated with the missions to the moon are only a couple of decades old, yet are listed on the National Register. The SAC alert facility at Wright-Patterson AFB may be eligible for listing. The 50 year age exclusion is not necessarily automatic (Ferguson, 1992e).



The Section 106 Process Framework (ACHP and GSA, 1992)

Undertaking an Undertaking

The term undertaking is used in the Section 106 process to describe any action that may impact a historic property. (Remember that's either a listed property, or an eligible property.) An undertaking is any activity, project, or program which may result in changes in the character or use of historic properties. Included are construction of new facilities, repair projects, maintenance, and, of course, demolition. Actions that involve disturbing the land are undertakings due to the potential to impact archeological or other historic sites (ACHP and GSA, 1991a:II-26).

Remember Risk Management

The undertaking may be a single construction project or maintenance activity. It may also be the ongoing facility maintenance performed by the Civil Engineering Squadron. The scope of the undertaking may depend upon whether a programmatic agreement is being negotiated, or if only a single Air Force activity is being processed.

Area of Potential Effects

The area of potential effects is that geographical area where the undertaking may cause changes in the character or use of historic properties. The area of potential effects, or APE as is it know in the vernacular of the business, will always include the actual site of the historic property. The area of potential effects should be identified as early as possible in the planning process. The APE need not be a single area, and does not always have specific bour [illegible] CHP, 1984a:9).

The Air Force, as the federal agency, makes this determination. Both direct results, and indirect results need to be considered. Indirect effects are such things as changes in land use, traffic patterns, or public access (ACHP and GSA, 1991a:II-28).

Identifying Resources

The Air Force has the responsibility for identifying cultural resources on Air Force properties. This responsibility rests squarely with the Air Force, and can not be delegated. It is possible, and, in fact, advisable and desirable to seek the help of

other agencies to carry out this work. However, the Air Force has the ultimate responsibility to see that the work is carried out properly (ACHP and GSA, 1991a:II-31).

Air Force Responsibility . . .

The first step is assessing the need for information. Once it is determined what is known, then other steps can be taken to identify resources. Background information should be reviewed. Then the assistance of the State Historic Preservation Officer should be requested on further actions to identify resources that may be effected (ACHP and GSA, 1991a:II-33).

Review all information that may help in determining whether there may be historic properties in the APE. Published information that describes the history, or prehistory of the base may be available from the Base Historian, or other sources. The real property records maintained by the Civil Engineering Squadron, Engineering Flight (DEE) will provide a wealth of information relating to base facilities. The real property records contain information on the age, size, and functional use of base facilities (Metz, undated:6).

Old surveys may not be reliable

Ask the State Historic Preservation Officer (SHPO) what is already known about resources on the Air Force installation. Consult the SHPO to determine who else should be contacted to find out information. Consult with the SHPO to see what other information you still need to know. Based on the recommendations of the SHPO, and others consulted, the Air Force makes the determination of what other actions need to be taken to identify resources (ACHP and GSA, 1991a:II-33).

The sure way to identify resources is to have an on-the-ground survey conducted by professionals qualified in the particular field of interest, such as; archeology, history, or architecture. Not only should survey efforts identify visible resources, but also areas where buried resources are likely to be encountered (Metz, undated: 6).

The Air Force identification effort needs to be consistent with national historic preservation policy. It must also be reasonable with respect to the undertaking and potential effects. The program should also provide procedures for resolving disputes over

identification methodology and approaches. The identification surveys may reveal there are no potentially historic properties. Resources that are identified need to be evaluated (ACHP and GSA, 1991a:II-34).

Evaluating Resources

Using the results of installation surveys, an inventory of cultural resource properties is developed. Cultural resources which have been identified, are evaluated against the criteria for inclusion on the National Register of Historic places. This evaluation process is carried out in consultation with the SHPO (Metz, undated:6).

Properties, which are not listed on the Register, or previously determined to be eligible are evaluated against the National Register criteria. If questions arise about the eligibility of a given property, then it is the responsibility of the Air Force to seek a formal determination of eligibility from the Keeper of the Register, who acts on behalf of the Secretary of the Interior. The decision of the Keeper is final. Be aware that the passage of time and changing perceptions of what is significant may justify re-evaluation of properties that were previously determined not to be eligible Evaluation of archeological sites usually requires a systematic excavation and analysis of materials recovered, in order to establish boundaries, characterize the cultural deposit and to obtain samples useful in dating sites (ACHP and GSA, 1991a:IV-17).

Important For Old Surveys . . .

It is possible that no historic properties (cultural resources) may be found. In that event, the Air Force must provide documentation to the SHPO and other interested parties that may have been involved in the consultation process. This essentially completes the Section 106 process for that portion of the installation researched for that particular project. However, any member of the public can request a review of the Air Force determination that there were no properties. This review is conducted by the Advisory Council on Historic Preservation (ACHP and GSA, 1991a: IV-18).

5.3 ASSESSING EFFECTS

Once the Air Force has completed an inventory and evaluation of the cultural resources, the next step is a determination of any impact the proposed action may have. If the properties of interest are not eligible for the National Register, then you may proceed. If they are eligible, then an assessment of the effects on the eligible properties must be made (Metz, undated:6; ACHP, 1984a:12).

There are three types of effect. **"No effect"** is obviously the situation where the undertaking will not have any impact on historic properties. **"No adverse effect"** describes the situation where the Air Force undertaking will impact a historic property, but the effect will not be harmful. When an undertaking will harm a property or has the potential to harm a property, the term **"adverse effect"** is used (Metz, undated:6).

Effect is measured against the characteristic or characteristics which qualified the property for the National Register. The effect can be beneficial, adverse, long term, temporary, direct, or indirect. Effects also include alterations to a property's location, setting, or use (ACHP and GSA, 1991a:II-41).

No Effect

Take into account effects & allow Council comment

Generally, avoidance of the property is the only situation where there will be no effect. The Air Force can make a determination of no effect if both the Air Force and the SHPO agree that the undertaking will not effect any National Register properties. If the SHPO does not agree with the Air Force determination of no effect, then essentially a determination has been made and further consultation is necessary. The MAJCOM should be involved in all cases of disagreement. Remember that the USAF is the final decision maker (ACHP and GSA, 1991a:II-44).

When SHPO and the Air Force agree on no effect, the project can proceed. Interested parties must be informed of the decision, and the documentation made available for public inspection. The Air Force does not need to notify the Advisory Council of the determination of no effect. As with other decisions, the public has

the right to request the Advisory Council to review the Air Force decision.

No Adverse Effect

When the Air Force has determined that there will, indeed, be effects from the undertaking, the next step is to evaluate whether or not the effects will be adverse to the cultural resource. This evaluation is done in consultation with the SHPO. The criteria for determining adverse effect are similar to those used to determine whether or not the property was eligible for the National Register. However, adverse changes to those characteristics are what is looked for (ACHP and GSA, 1991a:II-44).

An action is adverse when the integrity of the property's location, design, setting, materials, workmanship, feeling, or association are diminished. Some of the criteria of adverse effect include (ACHP and GSA, 1991a:II-45):

- destruction or alteration of all or part of the property
- isolation of the property from its environment, or alteration of the properties environment
- introduction of visual, audible, or atmospheric elements that are out of character with the property
- neglect of the property, which will result in the properties deterioration or destruction

If the SHPO and the Air Force agree that there are no adverse effects, the Air Force notifies the Advisory Council and provides documentation of the process. The documentation must also be made available for public inspection. The Air Force may also choose to have the Advisory Council review a no effect determination without the concurrence of the SHPO (ACHP and GSA, 1991b:IV-21).

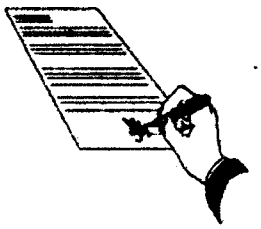
If the Council does not object to the no adverse effect determination within 30 days, the Section 106 process for the undertaking is completed. The Council may also propose

conditions or changes to Air Force findings of no adverse effect. Consultations are required, if the Council does not concur with the no adverse effect determination (ACHP and GSA, 1991b:IV-22).

Adverse Effect

If an adverse effect is found the Air Force must notify the Advisory Council and consult with the State Historic Preservation Officer to determine ways to reduce or avoid the adverse effect. An effect is adverse when: the undertaking meets one of the criteria, the SHPO conclusions of adverse effect are accepted, the Council objects to an Air Force determination of no adverse effect, or Council conditions for determining no adverse effect are not acceptable to the Air Force (ACHP and GSA, 1991a:II-52).

5.4 CONSULTATION AND COMMENT



When there could be potentially harmful or adverse effects to a property, the Air Force initiates a formal consultation process with the SHPO, Advisory Council, and possibly other interested parties. An effort is made to find acceptable ways to reduce the harm to the cultural resource. This consultation process ends in the signing of a Memorandum of Agreement (MOA), which details the actions to be taken in order to allow the project to proceed (Ferguson , 1992e:7).

The Advisory Council has the option to participate in the consultation process, unless the SHPO declines to participate. Indian Tribes must be invited if the action impacts properties of historic value to the tribe. The purpose of the process is to avoid, minimize, reduce, or mitigate the adverse effects of an undertaking. Ideally, the needs of the Air Force are met and the integrity of the historic property is not compromised (ACHP and GSA, 1991b:IV-23).

Consultation focuses on finding alternative ways of accomplishing the purpose of the undertaking without damaging historic properties. Items to be considered include alternative sites,

alternative designs, alternative undertakings, or no undertaking at all (ACHP, 1984a:19).

There may be some instances in which there are no alternatives to avoiding or mitigating adverse effects, and the undertaking will justify the loss of some of the property's characteristics or the property itself. However, in most instances, a mitigation measure is developed (ACHP and GSA, 1991a:II-61).

Mitigation

Creativity is the bottom-line with mitigation

Mitigation is the term for planning aimed at minimizing the damage to cultural resources. Mitigation measures are intended to lessen the impact of the undertaking, and make the impact acceptable in relation to the benefits of the undertaking. Some of the mitigation measures that may be used include (ACHP and GSA, 1991b:IV-23):

- limiting the magnitude of the undertaking
- modifying the project through redesign or reorientation of the site
- documentation of buildings or structures that will be altered or destroyed via the use of drawings, photographs, and histories
- salvage of archeological or architectural information and materials
- relocation of the historic property

Memorandum of Agreement

When all parties agree upon the measures to be taken a Memorandum of Agreement (MOA) is developed. The MOA specifies how the undertaking will be carried out to avoid or mitigate adverse effects, or documents the acceptance of the effects. The MOA is a legally binding document (ACHP and GSA, 1991b:IV-25).

The MOA serves several purposes. It specifies the mitigation or alternatives agreed to by the parties. The MOA identifies who is responsible for carrying out specified measures. Advisory Council comment is rendered in the MOA. The document also serves as an acknowledgment by the signatories that, in their collective view, the Air Force has taken into account the effects of the undertaking on historic properties (ACHP and GSA, 1991a:II-64).
If the Advisory Council was a consulting party in the development of the MOA, the Council signature on the MOA concludes the Section 106 process. Otherwise, the MOA will need to be reviewed by the Council, which may require additional changes to make the MOA acceptable (ACHP and GSA, 1991b:IV-26).

There are no time limits on the consultation leading to a three-party agreement between the Air Force, the SHPO, and the Council. If the Council did not participate in the consultation, it has 30 days to review the MOA. Likewise, there are no time limits on the consultation between the SHPO and the Air Force for the development of a two-party MOA. See Appendix A for a compiled list of Responsibilities and Time-Limits (ACHP and GSA, 1991a:II-67).

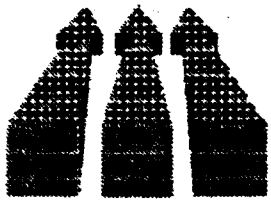
The regulations provide for any of the three parties to terminate the consultation process if it is determined that further consultation will not be productive. However, the Council encourages the use of consultation to the fullest extent possible (ACHP and GSA, 1991a: II-69).

Advisory Council Comment

Normally, comment of the Advisory Council is provided by the use of the Memorandum of Agreement (MOA). The Council may be a signatory to the MOA. Alternatively, the Council may accept an MOA between the State Historic Preservation Officer (SHPO) and the Air Force (ACHP and GSA, 1991b:IV-26).

When there is no MOA, the Air Force will need to request the Council's comment on the undertaking. There are specific requirements for documentation which must accompany such a request. The Council comment is provided to the head of the Air Force (ACHP and GSA, 1991a:II-70).

5.5 PROCEEDING



There are two basic requirements of Section 106 of the National Historic Preservation Act. The Air Force must take into account the effects of its actions on historic properties. Secondly, the Air Force must provide the Advisory Council on Historic Preservation the opportunity to comment (ACHP and GSA, 1992).

For undertakings which involve adverse effects to historic properties, the Council comment will normally occur with the signing or acceptance of a Memorandum of Agreement. Council comments can also be requested in the event that a MOA could not be reached (ACHP and GSA, 1991b:IV-13).

For undertakings which do not involve, have any effect or adverse effect on eligible or historic properties the level of consultation will be primarily between the Air Force installation and the State Historic Preservation Officer. This coordination also constitutes the Councils opportunity to comment on the Air Force undertaking (ACHP and GSA, 1991b:IV-13).

For good relations:

Contact the SHPO before proceeding

The ultimate outcome of the Section 106 process is for the Air Force to proceed with a construction project, maintenance activity, or other missions. The original scope of the Air Force undertaking may need to be modified to accommodate historic preservation. Air Force planning, programming, and budget processes need to allow adequate time for the Section 106 coordination and consultation. However, the **final authority** for decisions on Air Force facilities, historic or not, is the **Air Force**. Just remember that the Section 106 process must be completed before expenditure of funds on federal projects (ACHP and GSA, 1992).

Emergency Conditions

In the event of an emergency, such as declared by the President or the appropriate governor, other procedures may apply. The agency head can waiver responsibilities per 36 CFR Part 78. The MAJCOM, the Advisory Council and the SHPO should be contacted by phone in this event (ACHP and GSA, 1992).

Emergency events should be planned for in the Cultural Resources Management Plan (CRMP) and/or other emergency operations plans. For example, the clean up of a toxic spill on historic or archeological properties should be planned for. Acceptable courses of action need to be predetermined in the CRMP.

Late Discovery

Create a course of action in the CRMP

In some special situations, a historic property may not be discovered until work has begun. This situation is most likely for ground-disturbing activities, and is usually associated with archeological resources. Although, sometimes there may be unforeseen effects on other properties. Note, this situation is not simply neglect of the Section 106 procedures (ACHP and GSA, 1991a:II-74).

If the resource is primarily archeological, the Departmental Consulting Archeologist of the National Park Service must be contacted. Air Force Regulation 126-7 outlines the requirements. The base historic preservation plan or the MOA from the Section 106 consultation process may also outline what actions are to be taken.

A discovery situation will necessitate phone calls to SHPO, the Advisory Council, and the National Park Service. Appropriate provisions for handling the situation can be worked. However, there will likely be a delay in the construction project and increased costs. It is important that USAF construction contracts contain appropriate provisions for stopping construction activities in such circumstances (Spanne, 1992b).

Foreclosure of Council Comment

Foreclosure is the term used to describe situations where the Council is not given the opportunity to comment or it is meaningless for the Council to comment. Neglecting the Section 106 process is foreclosure. Proceeding with a project prior to completion of the process such that alternatives can no longer be considered is another situation. Foreclosure will leave the Air Force vulnerable to litigation (ACHP and GSA, 1991a:II-72).

5.6 PROGRAMMATIC AGREEMENTS

A programmatic agreement is a special type of memorandum of agreement that can be used to cover a class of undertakings. Without a Programmatic Agreement (PA) it is necessary to go through the Section 106 process for each undertaking on a case by case basis. The PA can save you from having to "re-invent the wheel" for each undertaking (ACHP and GSA, 1991a:II-79).

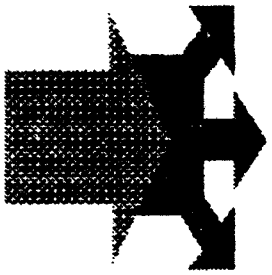
Programmatic Agreements can be used to spell out what further field survey work will be done, if any, when a predictive model has been used to identify properties. The agreement can be used to stipulate the actions that the Air Force needs to take to avoid, reduce, or mitigate effects (ACHP and GSA, 1991b:III-141).

The regulations provide for several situations where a PA is applicable, including routine management activities at federal installations. The development of a PA requires a consultation process involving the SHPO, the Advisory Council, and other interested parties. Once the PA is developed and executed, the PA satisfies the Air Force responsibilities for all individual undertakings carries out in accordance with the agreement. (ACHP and GSA, 1991b:IV-74).

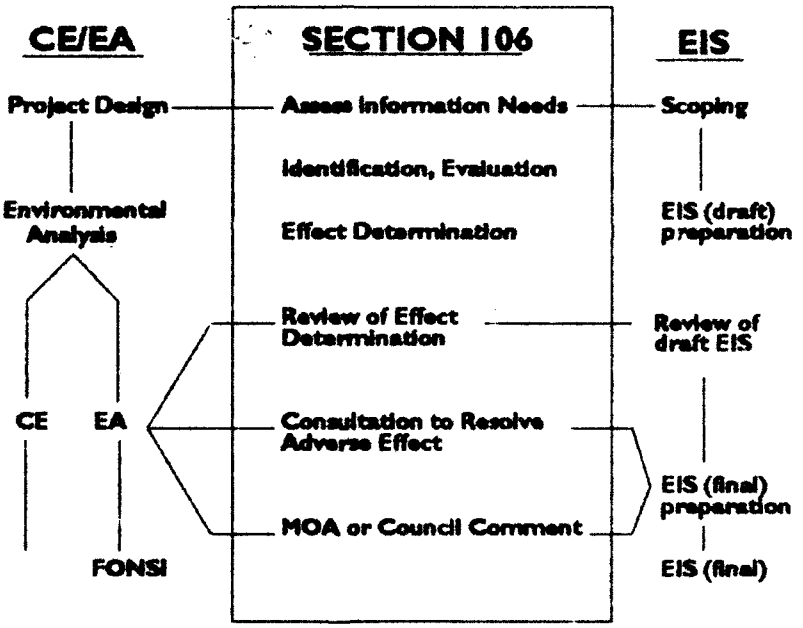
The process of developing a PA may typically take a year or more. However, initially, authority may not be delegated to the base until there is a proven track record (Section 106 course lecture). The PA is a very important part of the installation Cultural Resource Management Plan (CRMP).

The PA becomes the means by which the installation uses the steps outlined in the CRMP to carry out its Section 106 responsibilities. The PA and the CRMP are not the same document. They cover the same subjects, but a PA is usually 3-5 pages, whereas a CRMP can be several hundred pages.

5.7 INTEGRATING SECTION 106 WITH NEPA (EIAP)



The National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) address some of the same concerns. NEPA requires the environmental consequences of federal projects be considered. The NEPA review process may often necessitate the preparation of documention such as an Environmental Assessment (EA) or an Environmental Impact Statement (EIS) (ACHP and GSA, 1991b:I-35).



Coordinating NEPA and Section 106 Review
(ACHP and GSA, 1992)

Working With Section 106 Of NHPA

The National Historic Preservation Act (NHPA) encourages coordination with the environmental review process required by the National Environmental Policy Act (NEPA). Identification and evaluation of historic properties and determination of an undertaking's effects can be accomplished at the same time NEPA documents are developed. The draft environmental impact statement (EIS) or environmental analysis (EA) can be used for the Section 106 consultation process. The Memorandum of Agreement (MOA) which is developed from the Section 106 process can be used as part of the final NEPA documentation (ACHP and GSA, 1991a:II-14).

When using an EIS as a Section 106 documentation, attach a cover letter of Section 106 intention.

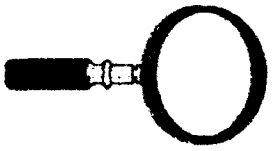
The Advisory Council also encourages coordination of NEPA and Section 106. Documentation for NEPA compliance, when it is used for Section 106 compliance, should be crossed-referenced in the cover letter that is sent with the package. (Council and GSA, 1991a:II-61). The Air Force counter-part to NEPA is the Environmental Impact and Analysis Process (EIAP). Air Force Forms 813 and 814 are used to initiate the environmental impact analysis process. At some installations all the EIAP forms are routed through the Base Historic Preservation Officer.

There is not an equivalent of a NEPA categorical exclusion (CATEX) or (CE) for the Section 106 process. The threshold for action under NHPA may also be lower than that of NEPA. Many actions that would not trigger a NEPA coordination may still require NHPA Section 106 review . An example may be the replacement of windows in a historic facility. While this action is likely covered by a NEPA CATEX, the Section 106 consultation process will still apply (Ferguson, 1992e).

Compliance with the National Environmental Policy Act (NEPA) and compliance with the National Historic Preservation Act (NHPA) are not the same thing. However, it may be possible to economize on the amount of paperwork, and also avoid "re-inventing the wheel" as part of the compliance process.

Chapter 6
Section 110 and Other Issues

6.1 SURVEYING YOUR RESOURCES



Identification of cultural resources is a key part of any management program. Without identification, resources can not be preserved, rehabilitated, or even be considered in the planning process. You must first assess your need for information, then determine the need for further action. This process is done in consultation with the State Historic Preservation Officer (SHPO). Based on this review, it may be necessary to undertake field studies or surveys (ACHP and GSA, 1991a:II-32).

Reconnaissance or Predictive Surveys

Reconnaissance surveys are used to make estimates of the need for further identification work. For example, a drive-through look at facilities or an archeological inspection of a sample tract, together with background research, might reveal that there is no need for additional work. In other cases, a reconnaissance survey will allow further work to be focused on particular properties or areas. The available information may also be used to develop a predictive model. For example, areas of the installation which need to have further archeological studies completed prior to development might be identified (ACHP and GSA, 1991b:III-137).

Intensive Surveys

The Secretary of the Interior's Standards and Guidelines for Identification is the basic technical guide for identification of properties. Contact the NPS (Appendix C or E) for a copy of this document. Usually such a survey is necessary and will involve an inspection of all land and structures in the area. Included is a background archival research, which usually includes interviews with people knowledgeable about the historic resources in the area.

Test excavations for archeological resources may be done. Detailed inspections of particular structures or buildings may also be included (ACHP and GSA, 1991:III-136).

SHPO Surveys

At a minimum, the SHPO will need to be consulted about any survey activities and methodology to be used at Air Force installations. In some cases, however, the SHPO may also conduct the field investigations and surveys necessary to identify resources. There is no federal requirement for SHPOs to perform the on-site investigations. However, in some states, it is the policy of the SHPO to be involved in the identification process (ACHP and GSA, 1992).

Survey Support

Installation cultural resource surveys may be completed with the assistance of another federal agency such as the U S Army Corps of Engineers (COE) or the National Park Service. Some installations (eg. Kelly AFB) are using the COE to prepare the Cultural Resources Management Plan (CRMP). Private contractors are also available and can often provide a faster response time than the COE or NPS, but at a possibly higher cost.

Other Air Force installations (eg Randolph AFB) are using the National Park Service to develop a CRMP, programmatic agreement, and a nomination package. Technical assistance by the NPS needs to be coordinated through the MAJCOM (Dept. USAF and NPS, 1992).

Survey Funding

Performance of archeological and historic facilities inventories which are part of a Section 106 coordination are considered O & S or "must do" environmental compliance items (See Chapter 4.6). Development of nomination packages for cultural resources qualifying for the National Register are considered Level I compliance items (Dept. USAF, 1992c:2).

6.2 SECTION 110 OF NHPA

The focus of Section 110 is long range planning and resource management. Section 110 lays out affirmative agency responsibilities for an inventory and evaluation of resources. Activities necessary for compliance with Section 110 are considered Level I compliance in the A-106 process.

Federal agencies are directed to provide leadership in preserving, restoring, and maintaining the historic and cultural environment of the nation. Agencies such as the Air Force are also required to administer the cultural properties under their control in a spirit of stewardship and trusteeship for future generations (Grosser, 1991:12).

Develop a Proactive Program . . .

The Air Force is required to locate and identify the historic properties it controls. Care must be exercised to ensure that properties which might qualify for inclusion on the National Register are not inadvertently demolished, substantially altered, or allowed to deteriorate significantly . Preservation of the properties, consistent with the mission and professional standards, is also required (ACHP and GSA, 1991a:II-9).

Section 110(a)(2) directs agencies to nominate all properties which appear to qualify for inclusion on the National Register. Historic properties are to be used to the maximum extent possible. Prior to constructing new facilities, the use of existing historic properties must be thoroughly evaluated (ACHP and GSA, 1991a:II-9).

When it may be necessary to alter or destroy a historic property, action must be taken to ensure that appropriate records are made. The level and type of recordation that is necessary is determined through the Section 106 consultation process. Architectural and engineering records will normally be provided to the Historic American Building Survey (HABS) or the Historic American Engineering Record (HAER) collections in the Library of Congress. The SHPO may also need copies of the records (ACHP and GSA, 1991b:III-36).

6.3 CURATION OF MATERIALS

The preferred treatment of archeological resources is preservation in place. Do not dig it up unless you have to. In some cases, however, it will be necessary to recover archeological information prior to completing a construction activity.

Recently adopted federal regulations set specific procedures, standards and guidelines for federal agencies to follow concerning the preservation of prehistoric and historic material remains, and associated records that are recovered. The requirements are contained in 36 CFR Part 79 (NPS, 1991c). These new federal regulations establish extensive paper-work requirements for the tracking and maintenace of collections. Very few existing repositories meet the new standards for storing historic artifacts and records. Contact the NPS (Appendix C) for a copy of 36 CFR Part 79.

The Air Force is responsible for ensuring that new or existing archaeological collections are placed in appropriate repositories. While it is possible for the Air Force installation to establish and maintain such a facility, the specific requirements for repositories may make that option impractical in many cases.

University, state, tribal, or regional federal facilities are some of the other curation options to be considered. The Air Force installation should work closely with the SHPO to determine an appropriate curation facility.

6.4 THE LEGACY PROGRAM

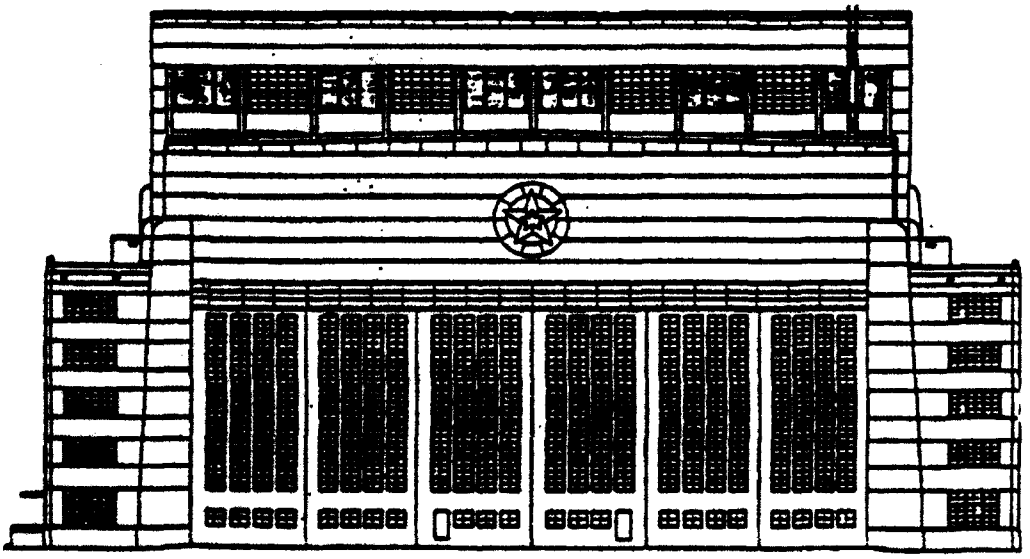
The Legacy Resource Management Program is a DOD-wide program that was developed in response to the Defense Appropriations Act, which spelled out nine legislative purposes for the program. The purpose of the Legacy is to enhance the management of natural and cultural resources (DOD, 1991:1-18).

Demonstration projects at more than ninety installations were initiated for the development of biological, cultural, and

geophysical components of the Legacy program. Specific to cultural resources, the task areas were developed as a general program for improving management of all DOD cultural and historical resources (DOD, 1991:1-18). Specific task areas have been developed to organize this management enhancement. These task areas are:

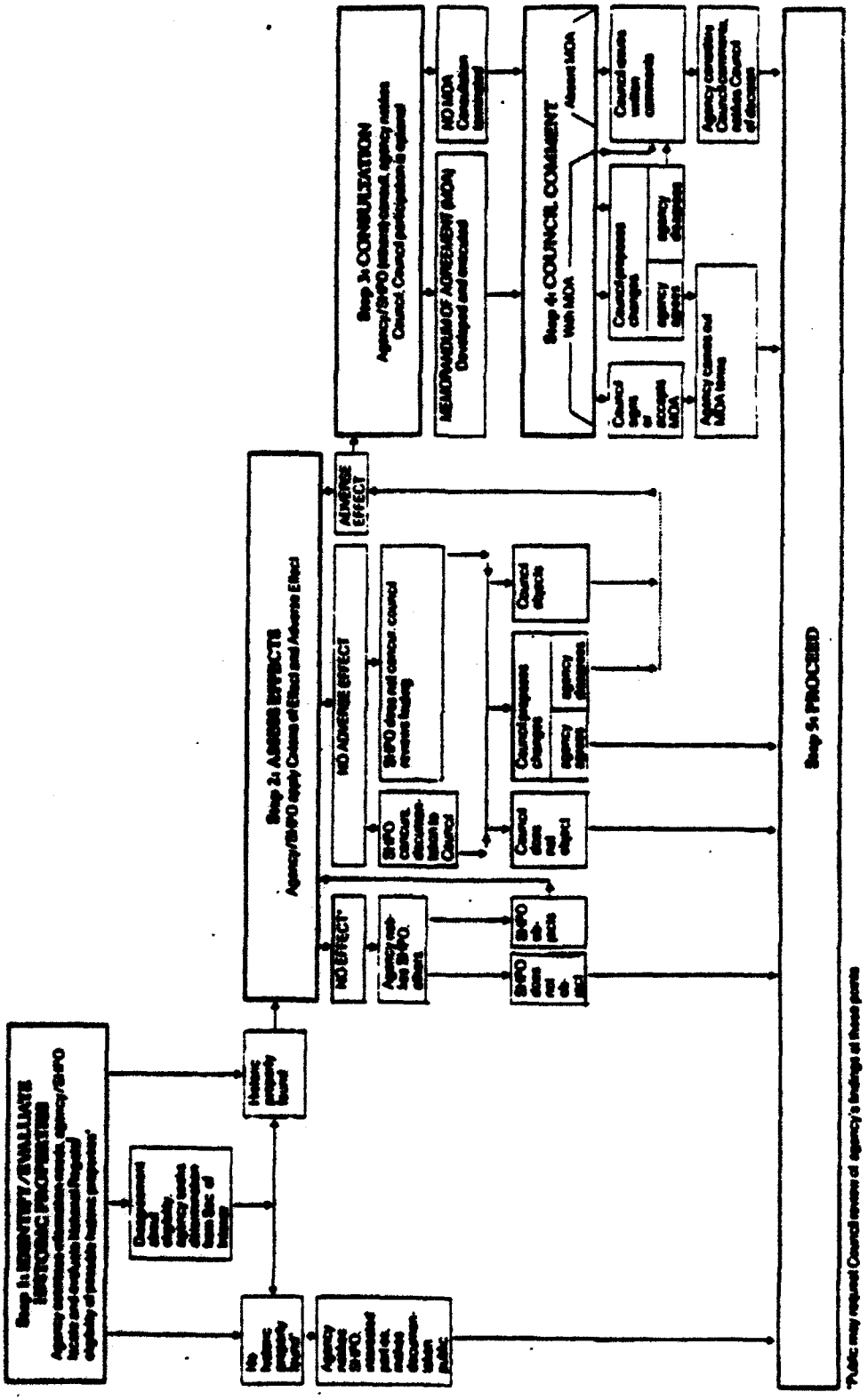
- Data Management
- Education, Recreation, Public Awareness
- Decision Framework
- Survey Current Programs
- Native Americans and Settlers
- Cold War Sites, Artifacts
- Project Management Procedures

The Base Historic Preservation Officer should utilize the Legacy Program as a data source for making decisions concerning cultural resources. This program provides a unique opportunity for transfer of technical information as well as an additional funding avenue for Level III and possibly Level I and II compliance projects. Contact your MAJCOM for further information concerning the Legacy program..



Wright-Patterson AFB, Building 65 (Eligible), HAER, NPS, Elaine Pierce, 1991.

NOTES



Section 106 Responsibilities and Time Limits

Action	Responsible Party	Time Limit
Determine if action is undertaking	Air Force	None
Determine APE	Air Force	None
Assess information needs	Air Force	None
Provide views, ie: identification	SHPO	30 days
Determine identification needs	Air Force	None
Conduct identification	Air Force	None
Determine eligibility	Air Force	None
Participate in determination	SHPO	30 days
Apply Criteria of Effect	Air Force	None
Assist in application	SHPO	30 days
Determine No Effect	Air Force	None
Object/do not object to determination	SHPO	15 days
Apply Criteria of Adverse Effect	Air Force	None
Assist in application	SHPO	30 days
Determine No Adverse Effect	Air Force	None
Concur/do not concur	SHPO	30 days
Send determination to Council	Air Force	None
Concur/object/propose changes	Advisory Council	30 days
Determine Adverse Effect	Air Force	None
Initiate consultation	Air Force	None
Conduct consultation	Air Force/SHPO/others	None
Prepare MOA	Air Force/SHPO/others	None
Send MOA to Council	Air Force	None
Concur/object/propose changes	Advisory Council	30 days
Respond to proposed changes	Air Force/SHPO	None
Seek final Council comment	Air Force	None
Render comment	Advisory Council	60 days*/30 days**
Make final decision	Air Force	None
Implement agreement	Air Force	None

(ACHP and GSA, 1992)

* When consultation is terminated and agency so requests.
** When agency does not agree to changes proposed in MOA.

TERMINOLOGY

ADVISORY COUNCIL ON HISTORIC PRESERVATION

An independent Federal agency, established by the National Historic Preservation Act (NHPA) of 1966, to advise the President and Congress on historic preservation matters and to administer the protective process established under Section 106 of the NHPA.

ADVERSE EFFECT

Changes that diminish those attributes of a property that qualify it for the National Register of Historic Places.

AREA OF POTENTIAL EFFECT (APE)

The geographic area within which the undertaking may cause changes in the character of or use of historic properties, including: all alternative locations for elements of the undertaking; all locations where the undertaking may result in disturbance of the ground; all locations from which elements of the undertaking (e.g., structures, or land disturbance) may be visible; all locations where the activity may result in changes in traffic patterns, land use, public access, etc..

BUILDING

A building is a structure created to shelter any form of human activity, such as a house, barn, church, hotel, or similar structure. Building may refer to a historically related complex such as a courthouse and jail or a house and barn.

CONSULTATION

A process initiated by the installation commander wherein the commander confers with the SHPO to seek ways to reduce or avoid adverse effects on historic properties. The Advisory Council and certain interested parties may participate as consulting parties.

Appendix B Key Terms and Acronyms

CONTEXT

Contexts or "historic contexts" are those patterns, themes, trends, or cultural affiliations in history by which a specific occurrence, property, or site is understood and its meaning (and ultimately its significance) within prehistory or history is made clear.

CULTURAL RESOURCE

Refers to both archeological and architectural resources. For archeology, it includes, but is not limited to, traditions, lifeways, cultural and religious practices, and other institutions to which a community, neighborhood, Native American tribe, or other group ascribes cultural significance, together with any artifacts and real property associated with such elements. For architecture, it includes, but is not limited to, buildings, sites, districts, structures, or objects, landscapes, and vistas. In addition, the term encompasses historic documents and relics.

DISTRICT

A district is a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, buildings, structures, elements, landscapes, or objects united by past or present events or aesthetically by plan or physical development. A district may also comprise individual elements separated geographically but linked by association or history.

EFFECT

A project, activity, or other undertaking has an effect on a historic property when the undertaking may alter characteristics of the property that qualify it for inclusion in the National Register of Historic Places. For the purpose of determining effect, alteration to features of the property's locations, setting, or use may be relevant depending on a property's significant characteristics and should be considered. An effect can be beneficial or adverse.

ENVIRONMENT

Biogeophysical and cultural surroundings and processes.

HISTORIC PROPERTY

Any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion on the National Register of Historic Places; such term includes artifacts, records, and remains which are related to such a district, site, building, structure, or object.

HISTORIC PRESERVATION

Identification, evaluation, recordation, documentation, curation, acquisition, protection, management, rehabilitation, restoration, stabilization, maintenance and reconstruction, or any combination of the foregoing activities.

INVENTORY

To determine the location of cultural resources that may have national, state, or local significance.

NATIONAL HISTORIC LANDMARK

Districts, sites, buildings, structures, or objects that have been determined by the Secretary of the Interior to be nationally significant in American history. Such properties are also included on the National Register of Historic Places.

NATIONAL REGISTER OF HISTORIC PLACES (or "NATIONAL REGISTER" or "REGISTER")

An inventory of districts, sites, buildings, structures, and objects significant in American history, architecture, engineering, archeology, and culture, and evaluated as significant at the national, state, or local level. Depending on their significant characteristics, properties must possess integrity of location, design, setting, materials, workmanship, feeling, and association.

OBJECT

An object is a material thing of functional, aesthetic, cultural, historical, or scientific value that may be, by nature or design, movable yet related to a specific setting or environment.

REHABILITATION

The process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values.

RESTORATION

The act or process of accurately recovering the form and details of property and its setting as it appeared at a particular period of time by means of the removal of later work or by the replacement of missing earlier work.

UNDERTAKING

Any project, activity, or program that can result in changes in the character or use of historic properties, if any such historic properties are located in the area of potential effect. the project, activity, or program must be under the direct or indirect jurisdiction of a Federal agency (ex. Air Force) or licensed or assisted by a Federal agency. Undertakings include new and continuing projects, activities, or programs and any of their elements not previously considered under Section 106 of NHPA.

ACRONYMS

ACHP	Advisory Council on Historic Preservation
AFCEE	Air Force Center for Environmental Excellence
AFCESA	Air Force Civil Engineering Support Agency
AFMC	Air Force Materials Command
AIRFA	American Indian Religious Freedom Act
ARPA	Archeological Resources Protection Act
BCP	Base Comprehensive Planning
BHPO	Base Historic Preservation Officer
CAD	Computer Aided Design or Drafting
CATEX (CE)	Categorical Exclusion
COE	[Army] Corps of Engineers
CRIBB	Cultural Resources Information Bulletin Board
CRIS	Cultural Resources Information System
CRMP	Cultural Resource Management Plan
CRM	Cultural Resource Management
DOD	Department of Defense
EA	Environmental Analysis
ECAMP	Environmental Compliance Assessment and Management Program
EIAP	Environmental Impact Assessment Process
EIS	Environmental Impact Statement

Appendix B Key Terms and Acronyms

EM	Environmental Management
EPC	Environmental Protection Committee
ETIS	Environmental Technical Information System
FONSI	Finding of No Significant Impact
GIS	Geographic Information System
GRASS	Geographic Resources Analysis Support System
GSA	General Services Administration
HABS/HAER	Historic American Building Survey and Historic American Engineering Record
MAJCOM	Major Command
MOA	Memorandum of Agreement
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHPA	National Historic Preservation Act
NPS	National Park Service
OMB	Office of Management and Budget
PPBS	Planning, Programming, and Budgeting System
SHPO	State Historic Preservation Officer
TSCRRC	Tri-Services Cultural Resource Research Center
USACERL	US Army Construction Engineering Research Laboratory
WIMS-ES	Work Information Management System-Environmental Subsystem

State Historic Preservation Offices

State Historic Preservation Officers (SHPOs) administer the national historic preservation program at the State level and are the regulators for the Air Force in each respective State. (Council and GSA, 1991b:IV-13-40)

Alabama

Alabama Historical Commission
725 Monroe Street
Montgomery, AL 36130
Tele: (205) 242-3184
FAX: (205) 240-3158

Alaska

Division of Parks
Office of History and Archeology
P.O. Box 107001
Anchorage, AK 99510-7001
Tele: (907) 762-2622
FAX: (907) 762-2535

American Samoa

Department of Parks and Recreation
Government of American Samoa
Pago Pago, American Samoa 96799
Tele: (684) 699-9614
FAX: (684) 699-4427

Arizona

Arizona State Parks
800 West Washington, Suite 415
Phoenix, AZ 85007
Tele: (602) 542-4009
FAX: (602) 542-4180

Arkansas

Arkansas Historic Preservation Program
The Heritage Center, Suite 200
225 East Markham Street,
Little Rock, AR 72201
Tele: (501) 324-9346
FAX: (501) 324-9345

California

Office of Historic Preservation
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001
Tele: (916) 653-8992
FAX: (916) 322-6377

Colorado

Colorado Historical Society
1300 Broadway
Denver, CO 80203
Tele: (303) 866-2136
FAX: (303) 866-5739

Connecticut

Connecticut Historical Commission
59 South Prospect Street
Hartford, CT 06106
Tele: (203) 566-3005

Delaware

Division of Historical & Cultural Affairs
Hall of Records
Dover, DE 19903
Tele: (302) 739-5313

District of Columbia

City Administrator
Historic Preservation Division
614 H Street, NW., Suite 305
Washington, DC 20001
Tele: (202) 727-7360
FAX: (202) 727-8040

Florida

Division of Historical Resources
Department of State
R.A. Gray Building
500 S. Bronaugh Street
Tallahassee, FL 32399-0250
Tele: (904) 488-1480
FAX: (904) 488-3353

Georgia

HIstoric Preservation Section
Floyd Tower East, Suite 1462
205 Butler Street, SE.
Atlanta, GA 30334
Tele: (404) 656-2840
FAX: (404) 656-2285

Guam

Guam Historic Preservation Office
Department of Parks and Recreation
490 Naval Hospital Road
Agana Heights, Guam 96910
Tele: (671) 477-9620
FAX: (671) 477-2822

Hawaii

Dept. of Land and Natural Resources
P.O. Box 621
Honolulu, HI 96809
Tele: (808) 548-6550

Idaho

Idaho Historical Society
210 Main Street
Boise, ID 83702
Tele: (208) 334-2682

Illinois

Illinois Historic Preservation Agency
One Old State Capitol Plaza
Springfield, IL 62701-1512
Tele: (217) 785-1153
FAX: (217) 542-7525

Indiana

Department of Natural Resources
402 West Washington Street
Indiana Governement Center South
Room C-256
Indianapolis, IN 46204
Tele: (317) 232-4020
FAX: (317) 232-8036

Iowa

State Historical Society of Iowa
Capitol Complex
East Sixth and Locust Streets
Des Moines, IA 50319
Tele: (515) 281-8837
FAX: (515) 282-0502

Kansas

Kansas State Historical Society
120 West Tenth
Topeka, KS 66612
Tele: (913) 296-3251
FAX: (913) 296-1005

Kentucky

Kentucky Heritage Council
12th Floor, Capitol Plaza Tower
Frankfort, KY 40601
Tele: (502) 564-7005
FAX: (502) 564-5530

Louisiana

Office of Cultural Development
Dept. of Culture, Recreation & Tourism
P.O. Box 44247
Baton Rouge, LA 70804
Tele: (504) 342-8200
FAX: (504) 342-3207

Maine

Historic Preservation Commission
55 Capitol Street, Station 65
Augusta, ME 04333
Tele: (207) 289-2132
FAX: (207) 289-2861

Marshall Islands, Republic of the

Interior and Outer Islands Affairs
Alele Museum, Box 18
Majuro, Republic of the Marshall Islands 96960
Tele: (692) 9-3226
FAX: (692) 9-4012

Maryland

Historical and Cultural Programs
Department of Housing and Community Development
100 Community Place, 3rd Floor
Tele: (301) 514-7600
FAX: (301) 987-4071

Massachusetts

Massachusetts Historicl Commission
80 Boylston Street, Suite 310
Boston, MA 02116
Tele: (617) 727-8470
FAX: (617) 727-5128

Michigan

Bureau of History, Dept of State
717 W. Allegan Street
Lansing, MI 49654
Tele: (517) 373-6362
FAX: (517) 373-0851

Micronesia, Federated States of

Office of Administrative Services
Division of Archives and Historic Preservation
FSM National Government
P.O. Box PS 35
Palikir, Pohnpei, FSM 96941
Tele: (691) 350-2194
FAX: (691) 350-2381

Minnesota

Minnesot Historical Society
690 Cedar Street
St. Paul, MN 55101
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FAX: (612) 296-1004

Mississippi

Department of Archives and History
P.O. Box 571
Jackson, MS 39205-0571
Tele: (601) 359-6940
FAX: (601) 359-6905

Missouri

State Department of Natural Resources
205 Jefferson, P.O. Box 176
Jefferson City, MO 65102
Tele: (314) 751-4422

Montana

State Historic Preservation Office
Montana Historical Society
225 North Roberts
Helena, MT 59620-9990
Tele: (406) 444-7715
FAX: (406) 444-2696

Nebraska

Nebraska State Historical Society
P.O. Box 82554
Lincoln, NE 68501
Tele: (402) 471-4787

Nevada

Division of Historic Preservation and Archeology
123 West Nye Lane, Room 208
Carson City, NV 89710
Tele: (702) 687-5138

New Hampshire

Division of Historical Resources and State Historic Preservation Office
Walker Building, State Office Park S.
15 South Fruit Street, P.O Box 2043
Concord, NH 03301
Tele: (603) 271-3483

New Jersey

Department of Environmental Protection
Office of New Jersey Heritage
401 East State Street
Trenton, NJ 08625
Tele: (609) 292-2885
FAX: (609) 292-8115

New Mexico

Historic Preservation Division
Office of Cultural Affairs
Villa Rivera, Room 101
228 East Palace Avenue
Santa Fe, NM 87503
Tele: (505) 827-6320
FAX: (505) 827-7308

New York

Parks, Recreation and Historic Preservation
Agency Building #1
Empire State Plaza
Albany, NY 12238
Tele: (518) 474-0443
FAX: (518) 474-4492

North Carolina

Division of Archives and History
Department of Cultural Resources
109 East Jones Street
Raleigh, NC 27601-2807
Tele: (919) 733-7305
FAX: (919) 733-5679

North Dakota

State Historical Society of North Dakota
Heritage Center
Bismark, ND 58505
Tele: (701) 224-2667

Northern Mariana Islands

Dept of Community & Cultural Affairs
Commonwealth of the Northern Mariana Islands
Saipan, Mariana Islands 96950
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FAX: (670) 322-4058

Ohio

Ohio Historic Preservation Office
Ohio Historical Center
1982 Velma Avenue
Columbus, OH 43211
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FAX: (614) 297-2411

Oklahoma

Oklahoma Historical Society
Wiley Post Historical Building
2100 N. Lincoln
Oklahoma City, OK 73105
Tele: (405) 521-2491
FAX: (405) 525-3272

Oregon

State Parks and Recreation
525 Trade Street, SE.
Salem, OR 97310
Tele: (503) 378-5019
FAX: (503) 378-6447

Palau, Republic of

Cultural Affairs, Bureau of Community Services, Ministry of Social Services
P.O. Box 100
Koror, Republic of Palau 96940
Tele: (680) 488-2489
FAX: (680) 488-1725

Pennsylvania

Pennsylvania Historical and Museum Commission
P.O. Box 1026
Harrisburg, PA 17108
Tele: (717) 787-4363
FAX: (717) 783-1073

Puerto Rico, Commonwealth of

Office of Historic Preservation
Box 82
La Fortaleza
San Juan, Puerto Rico 00918
Tele: (809) 721-2676
FAX: (809) 726-0957

Rhode Island

Rhode Island Historic Preservation Commission
Old State House
150 Benefit Street
Providence, RI 02903
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FAX: (401) 277-2968

South Carolina

Department of Archives and History
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Columbia, SC 29211
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FAX: (803) 734-8820

South Dakota

Office of History
South Dakota Historical Society
900 Governors Drive
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701 Broadway
Nashville, TN 37243-0442
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Texas

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Utah

Utah State Historical Society
300 Rio Grande
Salt Lake City, UT 84101
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58 East State Street
Montpilier, VT 05602
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Virgin Islands

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Virginia

Department of Historic Resources
Commonwealth of Virginia
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Richmond, VA 23219
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111 West 21st Avenue, KL-11
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FAX: (304) 348-2779

Wisconsin

Historic Preservation Division
State Historical Society of Wisconsin
816 State Street
Madison, WI 53706
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FAX: (608) 264- 6404

Wyoming

Wyoming State Historic Preservation Office
Department of Commerce
1825 Carey Avenue
Cheyenne, WY 82002
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FAX: (307) 632-2748

National Conference of State Historic Preservation Officers

National Conference of State Historic Preservation Officers
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Advisory Council on Historic Preservation Professional Staff

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FAX: (202) 786-1172

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FAX: (202) 786-1172

Northern division (CT, DE, IA, IL, IN, MA, ME, MI, MN, NH, NJ, NY, OH, PA, RI, VT, WI)
Southern division (AL, DC, FL, GA, KY, MD, MS, MO, NC, PR, SC, TN, VI, VA, WV)

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FAX: (303) 554-5325

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Cliveden, 6401 Germantown Ave
Philadelphia, PA 19144, (215) 438-2886

Midwest Office
Suite 1135, 53 West Jackson Boulevard
Chicago, IL 60604, (312) 939-5547

Northeast Office
Old City Hall
45 School Street, 4th Floor
Boston, MA 02108, (617) 523-0885

Southern Office
William Aiken House, 456 King St
Charleston, SC 29403, (803) 722-8552

Mountains/Plains Office
511 16th St, Suite 700
Denver, CO 80202, (303) 623-1504

Texas/New Mexico Office
500 Main St, Suite 606
Fort Worth, TX 76102, (817) 332-4398

Western Office
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San Francisco, CA 94104
(415) 956-0610

Air Force Cultural Resource Points of Contact

Headquarters Air Force

HQ USAF/CEVP
Room 5D381
The Pentagon, Attn: Maj Lillie
Washington, DC 20330-5130
DSN: 227-1235/8937, (703) 695-1235

Air Force Center for Environmental Excellance (AFCEE)

HQ AFCEE/ESO
Attn: William Metz
Bldg 1160
Brooks AFB, TX 78235-5000
DSN 240-3516, 512-536-3516

Regional Compliance Offices

HQ AFCEE/ESS
Attn: Phil Lammi
630 Sansome St. Room 1316
San Francisco, CA 94111-2278
(415) 705-1668

HQ AFCEE/ESD
Attn: Ed Lopez
525 Griffin St. Suite 5050
Dallas, TX 75242-0216
(214) 767-4671

HQ AFCEE/ESA
Attn: Tom Simms
77 Forsyth St. SW. Suite 291
Atlanta, GA 30335-6801
(404) 331-5313

Major Commands

AFDW/DE (1100 CES/DEPV)
Attn: Rob McCann
Bldg. Hanger 1
Bolling AFB, DC 20332-5000
DSN 297-5443
202-767-5443

HQ AFMC/CEV
Attn: Lynn Engelman
Wright-Patterson AFB, OH 45433-5000
DSN 787-4920
513-257-4920

HQ AFRES/DEPV
Attn: Toni Thorn
Robins AFB, GA 31098-6001
DSN 497-1073
912-926-1073

HQ AFSPACECOM/CEPV
Attn: Ken Nimmer
Peterson AFB, CO 80914-5001
DSN 692-5187
710-554-5187

HQ ATC/CEEV
Attn: Jack Siegel
Randolph AFB, TX 78150-5001
DSN 487-6352
512-652-6352

HQ AU/DEEV (3800 CES/DEEV)
Attn: Hugh Cowsert
Maxwell AFB, AL 36112-5001
DSN 493-5260
205-293-5664

HQ AMC/CEV
Attn: Robin Burgess
Scott AFB, IL 62225-50001
DSN 576-8332
618-256-8332

National Guard Bureau
NGB/CEVP
Attn: Dick Masse
Andrews AFB, MD 20331-6008
DSN 858-8142
301-981-8142

HQ PACAF/CEP
Attn: Art Buchman
Bldg 1102
Hickham AFB, HI 96853-5001
315-449-9695
808-449-9695

HQ ACC/CEVE
Atten: Dr. Paul Green
Langley AFB, VA 23665-5001
DSN 574-3056
804-764-3056

HQ USAFA/CEP
Attn: Duane Boyle
Colorado Springs, CO 80840-5546
DSN 259-2407
719-472-2407

AFCESA/SCO
Computer Services
Tyndall AFB FL 32403-5000
DSN 523-6410
904-283-6410

Army Cultural Resource Points of Contact

HQ USA/CEHSC-FN
Chief Army Natural and Cultural Resources
Ft. Belvoire, VA 22060-5516
703-704-1570
FAX: 703-704-1558

Tri-Services Cultural Resources Research Center
USACERL-EN
P.O. Box 9005
Champaign, IL 61826-9005
217-352-6511, ext. 617
Toll-Free: 800- USA-CERL outside Illinois; 800-252-7122 inside.
FAX: 217-373-7222

US Army Corps of Engineers Seattle District
CENPS-EN-DB
Historic Building Preservation Services
P.O. Box C-3755
Seattle, Washington 98124-2255
206 764-3614

National Park Service (NPS)

National Park Service
18th and C Streets, N.W.
Washington, DC 20240
202-343-4621

Associate Director for Cultural Resources
202-343-7625

Archeological Assistance Division
202-343-9573

Curatorial Services Division
202-343-8138

Historic American Buildings Survey and Historic American Engineering Record (HABS/HAER)
202-343-9600

National Register of Historic Places (The Keeper)
202-343-9536

Preservation Planning Branch
202-343-9505

Preservation Assistance Division
202-343-9573

Technical Preservation Services
202-343-9584

National Park Service Regional Offices

National Capital Regional Office
18th and C Streets, N.W.
Washington, DC 20240
202-485-9666

Mid Atlantic Region
143 South Third Street
Philadelphia, PA 19106
215-597-0652

Rocky Mountain Region
P.O. Box 25287
Denver, CO 80225-0287
303-969-2875

Southeast Region
75 Spring Street, SW
Atlanta, GA 30303
404-331-2635

Western Region
450 Golden Gate Avenue
Box 36063
San Francisco, CA 94102
415-744-3985

Alaska Region
2525 Gambell Street
Ancorage, AK 99503-2892
907-257-2668

Appendix C Points of Contact

User's Additional Points of Contact:

U.S. Department of Transportation
Federal Highway Administration

Florida Division Office

227 N. Bronough St.
Room 2015
Tallahassee, Florida 32301

IN REPLY REFER TO:

Memorandum of Agreement

Submitted to the Advisory Council on Historic Preservation

Pursuant to 36 CFR Part 800.6(a)

WHEREAS, the U.S. Department of Transportation, Federal Highway Administration (FHWA), proposes to provide financial assistance to the Florida Department of Transportation (FDOT) for the replacement of the Apalachicola River Bridge, Federal Aid Project No. BRF-460-2 (06) and BRF-460-3(18) Liberty and Calhoun Counties, State of Florida; and

WHEREAS, the FHWA has determined that the proposed project will have an effect upon Apalachicola River Bridge, an historic property eligible for inclusion in the *National Register of Historic Places*, and has consulted with the Florida State Historic Preservation Officer (SHPO) pursuant to 36 CFR Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470 (f)); and

WHEREAS, the Florida Department of Transportation (FDOT) has participated in the consultation and has been invited to concur in this Memorandum of Agreement;

NOW, THEREFORE, FHWA, FDOT and the Florida SHPO agree that the undertaking shall be implemented in accordance with the following stipulations in consideration of the effect this undertaking will have on the historic property.

Stipulations

FHWA will ensure the following measures are implemented:

1) Prior to its demolition or removal and relocation, the Apalachicola River Bridge will be subject to photographic documentation in accordance with the requirements of the Historic American Engineering Record. All documentation must be accepted by the U.S. Department of the Interior, National Park Service, HABS/HAER office prior to demolition or relocation of the structure. Copies of the documentation will be provided to the Florida Department of State Photographic Archives and to the SHPO for inclusion in the Florida Master Site File.

2) In consultation with the SHPO, the Apalachicola River Bridge shall be subject to a marketing effort intended to identify potential recipients willing to relocate and preserve the historic elements of the structure.

3) Prior to the selection of a new owner, the FHWA shall review all relocation proposals in consultation with the SHPO and shall afford the SHPO 30 days to inspect and comment on the proposed sites.

4) If no reasonable offer which conforms to the requirements of relocation, rehabilitation and maintenance is received, the FHWA may permit transfer of all or part of the property, without preservation covenants, upon the concurrence of the SHPO.

5) If applicable, an interim contract committing the new owner to accept the preservation covenants and to implement their requirements shall be signed at the same time the bill of transfer is executed between the FDOT and the new owner. Such contract shall be recorded in the real estate records of Liberty and Calhoun Counties, State of Florida and the County to which the bridge is to be relocated. The terms of the Covenants are included as Appendix A.

6) If, during design of the replacement structure, circumstances occur which prevent the designated recipient from implementing the approved location plan, then a new marketing effort will be initiated that follows the procedures employed originally.

7) Within 90 days following the relocation of the bridge, the SHPO shall re-evaluate the bridge on its new site and make a recommendation to the Secretary of the Interior as to its continued eligibility for inclusion on the National Register.

8) If a new owner cannot be found to relocate the bridge, it shall remain the property of FDOT and may be disposed of or demolished based upon project requirements, provided the requirements of stipulation 1 above have been completed.

Execution of this Memorandum of Agreement by FHWA, FDOT and the Florida SHPO, its subsequent acceptance by the Advisory Council on Historic Preservation, and implementation of its terms, evidence that FHWA has afforded the Council an opportunity to comment on Project No. BRF-460-2(06) and BRF-460-3(18) and its effects on historic properties and has satisfied the requirements of Section 106 of the National Historic Act (16 U.S.C. 470(f)).

Approved: Federal Highway Administration

By: _____ 9/19/89
J.R. Skinner, Division Administrator — Date

Concur: Florida Department of Transportation

By: _____ 9/29/89
Ben G. Watts, P.E. Interim Secretary — Date

Approved: Florida Historic Preservation Officer

By: _____ 9/22/89
George W. Percy, SHPO — Date

Accepted: Advisory Council on Historic Preservation

By: Robert D. Bush 11/17/89
Executive Director — Date

Advisory
Council On
Historic
Preservation

The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

PROGRAMMATIC AGREEMENT
AMONG THE DEPARTMENT OF THE ARMY,
THE ADVISORY COUNCIL ON HISTORIC PRESERVATION,
AND THE NEW YORK STATE HISTORIC PRESERVATION OFFICER
FOR THE OPERATION, MAINTENANCE AND DEVELOPMENT OF
THE UNITED STATES MILITARY ACADEMY
AT WEST POINT, NEW YORK

WHEREAS, the Department of the Army (Army) has determined that the proposed addition to and window replacement at Washington Hall (Building 745) and continued operation, maintenance and development activities at the United States Military Academy at West Point, New York (West Point), which is a National Historic Landmark, and other properties under its jurisdiction, will have an effect upon properties included in or eligible for the National Register of Historic Places, and has requested the comments of the Advisory Council on Historic Preservation (Council) pursuant to Section 106 and Section 110(f) of the National Historic Preservation Act (16 U.S.C. 470f and 470h-2(f)) and its implementing regulations, "Protection of Historic Properties" (36 CFR Part 800),

NOW, THEREFORE, the Army, the New York State Historic Preservation Officer (SHPO), and the Council agree that these activities at West Point shall be implemented in accordance with the following stipulations in order to take into account the effect on West Point.

Stipulations

The Army will ensure that the following measures are carried out.

I. A plan for the management of historic, architectural and archeological resources (termed an Historic Preservation Plan in Army Regulation AR 420-40; herein termed "Plan") will be developed and implemented for West Point. Work carried out in accordance with the Plan approved in accordance with paragraph 2.6 of AR 420-40 will require no further review by the New York SHPO or the Council.

The Plan will include, but not be limited to the following.

A. OVERVIEW: This will include a summary of the historic use and development of West Point; an analysis of its architectural evolution in the context of its role as a national military academy; a projection of the types and likely locations of archeological properties that are expected to be found; a summary of past surveys on which these projections are based; and other investigation strategies for the identification and evaluation of historic, architectural and archeological properties.

B. IDENTIFICATION, INVENTORY and EVALUATION: This will include a procedure to be used at West Point for determining whether historic, architectural and archeological properties meet the eligibility criteria of the National Register of Historic Places (National Register) which will provide for consultation with West Point's Historic Preservation Committee (HPC) and the New York SHPO and, if necessary, the Secretary of the Interior, as set forth in 36 CFR Part 800.4. The procedure should include, but not be limited to the following:

1. identification and evaluation of all historical, architectural, and archeological resources (known or discovered during activities covered by this Agreement) located within West Point to determine their level of contribution to the area and to the development of West Point as a national military academy. (In addition to structures of historic, architectural and cultural significance, the evaluation should include significant interior spaces, landscaping, open spaces, and archeological resources).

2. use of the Historic Structures Inventory, United States Military Academy, West Point, New York (Historic American Buildings Survey, National Park Service, 1984) as a basis for the identification, inventory, and evaluation procedures stipulated in this Agreement.

3. identification and evaluation of resources under the jurisdiction of West Point to determine if they contribute to West Point, or if they meet the criteria for inclusion in the National Register. Those that meet the criteria will be submitted to the Secretary of the Interior for inclusion on the Register.

4. a process whereby the existing National Historic Landmark boundaries of West Point are reevaluated based on the findings of the identification process and, if appropriate, resubmitted to the Secretary of the Interior for modification.

Based upon an inventory and evaluation, buildings and structures will be categorized in accordance with Army Technical Manual TM5-801-1 and further designated as buildings to be rehabilitated or demolished as required by the West Point Master Plan.

C. TREATMENT: Establishment of standards and procedures for the treatment of all identified resources under the jurisdiction of West Point developed in consultation with the New York SHPO. These standards and procedures should include, but not be limited to the following:

1. protecting, preserving, and maintaining historic, architectural, and archeological resources in place as part of the ongoing management of West Point;

2. rehabilitation in accordance with Army Technical Manual TM5-801-2 and the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (hereafter "Standards");

3. stabilization and continued maintenance;

4. documentation to the standards of the Historic American Buildings Survey for those structures which will be substantially altered or demolished.

5. archeological data recovery and provisions for permanent curation of all specimens, field notes, photographs, negatives, and processed data at an appropriately equipped institution that meets the standards set forth in Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines (48 FR 44716 et. seq.) and that makes this data available to other parties for research or other appropriate purposes.

6. a process for selecting an appropriate alternative to undertakings that would have an adverse effect on resources, which includes consultation with West Point's HPC, the New York SHPO and, if necessary, the Council.

7. a procedure to be followed, if, after meeting all the responsibilities for identification of properties, the Army finds, or is notified after an undertaking has begun, that the undertaking will affect a previously unidentified National Register listed or eligible property. This procedure may require further consultation with the Secretary of the Interior and compliance with Section 800.11 of the Council's regulations.

D. SCHEDULE: The Plan will be developed in consultation with the New York SHPO and the Council in the following order:

1. Within 120 days of the ratification of this Agreement, the Army will concurrently provide for review a draft scope of work for the Plan to the Council and the New York SHPO. The New York SHPO and the Council will provide the Army with comments within 45 days of receipt of the draft scope of work. The Army will take those comments into consideration in developing the final scope of work.

2. Within 24 months of expiration of the review period on the draft scope of work, the Army will concurrently provide a draft Plan for review and comment to the Council and the New York SHPO. The New York SHPO and the Council will provide the Army with comments within 45 days of receipt of the draft Plan. The Army will take these comments into account in developing the final Plan.

3. Within 6 months of expiration of the comment period on the draft Plan, or within a time period mutually agreed upon by West Point, the New York SHPO and the Council, the Army will issue a final Plan, with copies to the Council and the New York SHPO.

4. Should the Army desire to modify the Plan, the Council and the New York SHPO will be afforded 30 days in which to review and comment upon proposed modifications. The Army will take these comments into consideration in modification of the Plan.

5. The Army will consult with the New York SHPO and the Council in an effort to resolve any objections or respond to any comments received on the scope of work or the Plan.

6. Within 30 days of issuance of the final plan, the Army will initiate implementation of the Plan at West Point.

E. PLAN STANDARDS: The Army will ensure that the Plan is consistent with and responsive to the values of West Point as a national military academy, those other properties identified as eligible for the National Register, and pertinent sections of the following guidelines and standards.

*The Archeological Survey: Methods and Uses (DOI, 1978; GPO Stock No. 024-016-00091-9).

*Preservation Planning in Context (ACHP).

*Archeology and Historic Preservation; Secretary of the Interior's Standards and Guidelines, 48 FR 44716 et. seq., September 29, 1983.

*The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Revised 1983).

*The National Park Service's Preservation Briefs series, (presently numbers 1-14) (National Park Service).

*The standards of the Historic American Buildings Survey (HABS) for recording architectural, historical, and engineering properties, as determined in consultation with HABS, National Park Service, Department of the Interior.

*"Historic Preservation Administrative Procedures," Technical Manual TM5-801-1, Department of the Army, 1975.

*"Historic Preservation Maintenance Procedures," Technical Manual TM5-801-2, Department of the Army, 1977.

*"Historic Preservation," AR 420-40, Department of the Army, May 15, 1984.

*The Plan will be prepared by or under the supervision of a person who meets the professional standards set forth in the AR 420-40. Final selection of the person will be done in consultation with the New York SHPO.

II. Prior to completion and implementation of the Plan all projects that may affect properties identified in Stipulation I will be handled in accordance with Council regulations 36 CFR Part 800, with the following exceptions. These undertakings will have no effect on significant properties and will require no review by the New York SHPO or the Council so long as they conform to the Standards. (For the purposes of Stipulation II, "significant" refers to all category 1 and category 2 resources, and to the exteriors of category 3 resources within zones 1 and 2, and to all modifications or additions which are fifty years old or older within these resources.)

a. Minor, in kind repair or replacement of building or site features, elements, or materials such that original/ significant historic fabric is matched in material, size, dimension, color, texture, finish, construction details, and all other visual qualities. Complete or major replacement of a building system or component, such as a roof or windows, is excluded.

b. All interior and exterior painting, wallpapering, staining provided that traditional, removable materials are used, appropriate preparation techniques are employed, and the original/significant texture is matched.

c. Modifications to HVAC, plumbing or electrical systems provided that no changes are visible on the exterior or on the interior with the exception of basement, attic, and other concealed duct, plenum, or shaft spaces or the modifications are minor in nature and do not alter or detract from the historic or architectural significance of the resource.

d. Insulation in floors and ceilings provided that the original/significant finish material and surface are not impacted, an appropriate vapor barrier is achieved on the warm side of the cavity, and adequate ventilation is provided on the cold side of the cavity.

e. The installation of interior or exterior storm windows provided that the storm unit completely fills the existing opening (no filler panels to be used); the method of operation and meeting rail of the storm unit align with that of original/significant window or, on the interior a fixed piece of glazing with no intermediate members be installed; the color of the storm units match that of original/significant adjacent

members; the installation of the storm unit does not damage any historic fabric; the installation and the prime window are properly prepared so that infiltration is eliminated.

f. Caulking and weatherstripping with comparable materials such that the color of the caulking is consistent with the appearance of the building.

g. Replacement or modification of non-original/ significant lighting fixtures or systems that do not alter or detract from the significance of the resource.

III. Rehabilitation work, including window, door, and storm door retrofitting and replacement in-kind (where retrofitting is not proved feasible in consultation with the New York SHPO, who shall have 30 days to respond to the initial notification of intent), that is carried out in accordance with the Army Technical Manual TM5-801-2 and the Standards will have no adverse effect and will require no review by the Council. Plans and specifications for rehabilitation work will be provided to the New York SHPO prior to the initiation of the work.

IV. Rehabilitation work that cannot meet the Standards, window and storm door replacement projects (where in-kind replacement is not feasible), and all new construction activities at West Point will be submitted to the New York SHPO and the Council in accordance with Section 800.5(c) of the Council's regulations.

V. All demolition work within or adjacent to resource areas that will affect historic resources will be submitted to the New York SHPO and the Council in accordance with Section 800.5(c) of the Council's regulations.

VI. Prior to any alteration or demolition of any identified category 1, 2, or 3 resources, those properties will be recorded so that there is a permanent record of their history and appearance. The Army will first contact the Historic American Buildings Survey, (National Park Service, Department of the Interior, Washington, DC) which will determine what documentation is required. All documentation must be accepted by HABS, and the New York SHPO notified of its acceptance, prior to the alteration or demolition. Copies of this documentation will be provided to the New York SHPO.

VII. The Army will actively ensure compliance with the Archaeological Resources Protection Act of 1979 (ARPA) and will advise all contract and Army personnel and resident dependents against illegal collection of cultural materials and of the penalties for such collection imposed by the Act. Appropriate measures will be developed for the protection of historic and archeological resources from looting and vandalism and for protection under ARPA.

VIII. Copies of reports, plans, or other products generated under this Agreement and in the implementation of the Plan will be provided to the New York SHPO for review and comment. The New York SHPO will also be provided with copies of all site survey forms, photographs, U.S.G.S. topographic maps indicating areas actually surveyed and precise locational information of all recorded resources and any other relevant maps or documents.

IX. Copies of any final technical reports will be furnished to the New York SHPO and to the Defense Technical Information Center. Locational information for archeological resources may be withheld from final technical reports that are likely to be available to the public where release of such information might increase vandalism or misuse of a cultural property.

X. This Agreement will be reviewed by the consulting parties 12 months from its ratification date to determine if any of the terms of the Agreement cannot be met or if a change is necessary. If at any time any of the signatories to this Agreement determines that its terms cannot be met, that signatory will immediately request the consulting parties to consider an amendment or addendum to the Agreement. Such an amendment or addendum will be executed in the same manner as the original Agreement.

Execution of this Memorandum of Agreement evidences that the Army has afforded the Council an opportunity to comment on the continued operation, maintenance and development of West Point and the effects of these activities on West Point and other properties included in or eligible for inclusion in the National Register.

26 March 87
(date)
Advisory Council on Historic Preservation

7/27/87
(date)
New York State Historic Preservation Officer

25 August '87
(date)
Superintendent
United States Military Academy, West Point

(date) 28 Sep (?)
Office of the Chief of Engineers
Department of the Army

The National Park Service (NPS), the Advisory Council on Historic Preservation, and several other organizations publish and distribute technical information, including: books, handbooks, technical leaflets, microfiche, microfilm, slide/tape shows and data bases which are available through sales from several outlets. Council information is available at no charge and some NPS information is available at no charge.

Both the NPS and the Advisory Council publish a condensed listing or catalog of their respective information sources. These documents are:

COUNCIL PUBLICATIONS
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, N.W., Suite 809
Washington, DC 20004
(202) 786-0505

8 pp. February 1990. Single copies available from the Council at no charge.

CATALOG OF HISTORIC PRESERVATION PUBLICATIONS
National Park Service
Interagency Resources Division
P.O. Box 37127
Washington, DC 20013-7127
(202) 343-9500

35 pp. 1990-1992. Single copies availabe from the NPS at no charge

The following is a non-comprehensive list of a few of the available documents from each of these sources:

ADVISORY COUNCIL PUBLICATIONS

Where to Look: A Guide to Preservation Information
A reference guide to information sources in preservation, the book is a selective gathering of information on available materials in preservation and related fields.

88 pp. July 1982. Single copies available from the Council at no charge.

Protection of Historic Properties [36 CFR Part 800]
A typeset, easy-to-read copy of the regulations for Federal agency compliance with Section 106 of NHPA. Based on revised regulations, which were published in the Federal Register, Vol. 51, No. 169, on September 2, 1986.

19 pp. October 1985. Single copies available from the Council at no charge.

Section 106, Step-by-Step
A detailed document that walks the reader through each step of Section 106 review process established under 36 CFR Part 800
63 pp. October 1986. Single copies available from the Council at no charge.

Preparing Agreement Documents
This guidance document is designed for use in preparation of Memoranda of Agreement, Programmatic Agreements, and conditioned determinations of "no adverse effect." This revised publication contains a new section with complete sample documents.
88 pp. September 1989. Single copies available from the Council at no charge.

The Section 110 Guidelines: Annotated Guidelines for Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act.
This document, jointly issued by the Council and the NPS, includes annotations to Section 110, which states that all Federal agencies must carry out their programs in accordance with national historic preservation policy, designate historic preservation officers, identify and preserve historic properties under their ownership or control, and make efforts to minimize harm to National Historic Landmarks.
56 pp. November 1989. Single copies available from the Council at no charge.

Fire Safety Retrofitting in Historic Buildings
This publication gives specific examples of methods for retrofitting fire safety systems into historic buildings, which will ensure public safety and protection of property, as well as avoid damage to distinctive historic features.
24 pp. August 1989. Single copies available from the Council at no charge.

Treatment of Archeological Properties: A Handbook
The handbook is designed to assist the parties consulting under the Council's regulations and explains how archeological programs and projects should be conducted.
39 pp. February 1981. Single copies available from the Council at no charge.

NATIONAL PARK SERVICE AND OTHER PUBLICATIONS

General Information:

National Register Bulletins: The bulletins provide guidance on a variety of topics related to the Air Force and the survey, evaluation, registration, and listing of historic properties in the National Register. The following publications are currently available free upon request by writing:

Interagency Resources Division
P.O. Box 37127
Washington, DC 20013-7127

Bulletin 2: Nomination of Deteriorated Buildings to the National Register. Describes instances in which the National Register will list vacant, abandoned, and deteriorated buildings. 1 pp.

Bulletin 4: Contribuiton of Moved Buildings to Historic Districts. Guidelines for determining when a moved building can contribute to National Register or certified local district. 6 pp.

Bulletin 6: Nomination of Properties Significant for Assocation with Living Persons. Discusses when it is appropriate to nominate properties of potential historical significance whose assocations are with living persons. 4 pp.

Bulletin 12: Definition of National Register Boundaries for Archeological Properties. Using case studies, reocmmends approaches for delineating boundaries for commonly encountered archeological properties. 26 pp.

Bulletin 14: Guidelines for Counting Contributing and Noncontributing Resources for National Register Documentation. Provides guidance for distinguishing and counting contributing and noncontributing resources conprising and documented property, regardless of size or complexity. 7 pp.

Bulletin 15: How to Apply the National Register Criteria for Evaluation. Explains how the National Park Service applies the criteria used to determine the eligibility of properties for listing in the National Register of Historic Places. 90pp.

Bulletin 16: Guidelines for Completing National Register of Historic Places Forms. For use in completing National Register forms. 133 pp.

Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes. Explains the process by which designed historic landscapes are documented, evaluated, and nominated to the National Register. 13 pp.

Bulletin 19: Policies and Procedures for Processing National Register Nominations. Explains procedures for processing nominations that have been adopted to address the changing function of the National Register list and describes common documentation problems and how they are addressed. 19 pp.

Bulletin 21: How to Establish Boundaries for National Register Properties. Guidelines, also uses hypothetical examples to explain how to determine National Register boundaries. 4 pp.

Bulletin 22: Guidelines for Evaluating and Nominating Properties That Have Achieved Significance Within the Last Fifty Years. Guidance for individuals and organizations in evaluating and justifying the "exceptional importance" required for listing properties that have achieved significance within the last 50 years. 11 pp.

Bulletin 23: How to Improve the Quality of Photos for National Register Nominations. Offers suggestions to help photographers achieve better quality in their photographic documentation of buildings and architectural details. 7 pp.

Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning. Guidance for the Air Force and other Federal agencies undertaking surveys of historic resources. 112 pp.

Bulletin 28: Using the UTM Grid System to Record Historic Sites. Introduces the Universal Transverse Mercator (UTM) Grid System and its application to mapping historic and archeological sites. Uniform procedures for recording site locations are provided. 42 pp.

Bulletin 29: Guidelines for Restricting Information About Historic and Prehistoric Resources. Guidance on determining which resources should be protected by restricting information on their location and character from general distribution. 7 pp.

Bulletin 30: Guidelines for Evaluating and Documenting Rural Landscapes. Guidelines, including definition of rural lanscape, description of its characteristics, practical methods for survey and research, application of National Register criteria, and National registration requirements. 35 pp.

Bulletin 33: National Register Information System Manual for State and Federal Users. Designed for State and Federal users of the National Register Information System (NRIS). The NRIS is a database of properties listed in, determined eligible for, or pending listing in the National Register. 31 pp.

Bulletin 34: Guidelines for Evaluating and Nominating Historic Aids to Navigation. Provides guidance on evaluating the significance and integrity of historic aids to navigation (lighthouses, daymarks, sound signals) as well as preparing documentation for preservation planning, including National Register monimation. 22pp.

Bulletin 35: National Register Casebook: Examples of Documentation. Examples of multiple property case studies, maritime nominations, and concise nominations. Index.

Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties. Assists in determining whether properties thought or alleged to have traditional cultural significance are eligible for inclusion in the National Register. Gives special attention to properties of significance to Native American groups, and to discussing the place of religion in the attribution of such significance. 22 pp.

Bulletin 39: Researching a Historic Building. Provides basic information on methods of researching an individual building for listing in the National Register. 20 pp.

CRM, Volume 15 No. 2: Discovering Our Aviation Heritage. Provides general information on several cultural resources management projects involving flight. 33pp.

The Cultural Resources Information Management Series disseminates information about information management technologies in cultural resources management. The series includes reports on Geographic Information Systems (GIS), developments in cultural resource data standards, and information management projects at the local, state and national levels. The reports are also free through the Interagency Resource Division.

Information Mangement Report No. 1: Computer Use in State Historic Preservaion Offices. A detailed directory and index of computerized cultural resources databases that are operational or under development in 53 State Historic Preservation Officer (SHPO) offices. Information on whom to contact and the future plans for automation in each State is included. 80 pp.

Information Management Report No. 2: Geographical Information Systems Use in State Government Agencies. A survey of the principal GIS operations in each State governemtn and a brief summary of the nature of the system, contacts, and state GIS coordination efforts. 54pp.

Appendix E Available Reference Documents

Technical Assistance Information:

Archeological Assistance

The Archeological Assistance Division developed a publication program that includes the distribution of a quarterly newsletter, the Federal Archeology Report, and a series of technical briefs that are published four to six times a year. Both are available free. Write:

Publications Specialist
Archeological Assistance Division
National Park Service P.O. Box 37127
Washington DC 20013-7127

Federal Archeology REPORT. Available upon request.

Technical Brief No. 1: Filter Fabric: A Technique for Site Stabilization.

Technical Brief No. 2: Arizona Archeology Week: Promoting the Past to the Public.

Technical Brief No. 3: Archeology in the National Park Landmarks Program.

Technical Brief No. 4: Archeology in the Classroom: A Case Study form Arizona.

Technical Brief No. 5: Intentional Site Burial: A Technique ro Protect Against Natural or Mechanical Loss.

Technical Brief No. 6: The Kentucky Archeological Registry: Landowner Participation in Site Preservation.

Technical Brief No. 7: Federal Archeological Contracting. Utilizing the Competitive Procurement Process.

Technical Brief No. 8: Revegetation: The Soft Approach to Archeological Site Stabilization.

Technical Brief No. 9: The National Historic Landmarks Program Theme Study as a Preservation Planning Tool.

Technical Brief No. 10: The Archaeological Resources Protection Act.

Technical Brief No. 11: Voluteers in Archeology.

Technical Assistance in the Preservation of Buildings, Structures, and Objects

The Secretary of the Interior's Standards for Rehabilitation with Guidelines for Rehabilitating Historic Buildings.
Used to determine whether the historic character of a building is preserved in the process of rehabilitation. The accompanying guidelines, intended to assist in applying the Standards, recommend reponsible methods and approaches and also list those treatments that should be avoided. Usually available through the SHPO free of charge.
59 pp. 1990. GPO stock number 024-005-01061-1. $2.00 per copy.

The U.S. Department of Commerce National Technical Information Service publishes the Preservation Tech Notes and Technical Reports which provide innovative solutions to specific problems in preserving cultural resources. Tech Notes are intended for practitioners in the preservation field, including architects, engineers, contractors, and maintenance personnel. This information is available free. Write:

U.S. Department of Commerce
National Technical Information Service
5285 Port Royal Road
Springfield, VA 22161
(703) 487-4650

NTIS Products & Services Catalog, PR-827/360
Subjects include: Access to Historic Buildings for the Disabled, Cyclical Maintenance for Historic Buildings, Epoxies for Wood Repairs, etc..

The Superintendent of Documents, Government Printing Office publishes Preservation Briefs and other documents which also give technical assistance in the preservation of historic buildings. Documents are available at $1.00 per copy. Write:

Superintendent of Documents
Government Printing Office
Washington DC 20402-9325
(202) 783-3238

Preservation Briefs 1: The Cleaning and Waterproof Coating of Masonry Buildings.

Preservation Briefs 2: Repointing Mortar Joints in Historic Brick Buildings.

Preservation Briefs 3: Conserving Energy in Historic Buildings.

Preservation Briefs 4: Roofing for Historic Buildings.

Preservation Briefs 5: The Preservation of Historic Adobe Buildings.

Preservation Briefs 6: Dangers of Abrasive Cleaning to Historic Buildings.

Preservation Briefs 7: The Preservation of Historic Glazed Architectural Terra-Cotta.

Preservation Briefs 8: Aluminum and Vinyl Siding on Historic Buildings: the Appropriateness of Substitute Materials for Resurfacing Historic Wood Frame Buildings.

Preservation Briefs 9: The Repair of Historic Wooden Windows.

Preservation Briefs 10: Exterior Paint Problems on Historic Woodwork.

Preservation Briefs 12: The Preservation of Historic Pigmented Structural Glass (Vitrolite and Carrar Glass).

Preservation Briefs 13: The Repair and Thermal Upgrading of Historic Steel Windows.

Preservation Briefs 14: New Exterior Additions to Historic Buildings: Preservation Concerns.

Preservation Briefs #1-14 (set) available under GPO stock number: 024-005-01026-2 for $9.00.

Preservation Briefs 15: Preservation of Historic Concrete: Problems and General Approaches. GPO # 024-005-01027-1

Preservation Briefs 16: The Use of Substitute Materials on Historic Building Exteriors. GPO # 024-005-01037-8

Preservation Briefs 17: Architectural Character-Identifying the Visual Aspects of Historc Buildings as a Aid to Preserving Their Character. GPO # 024-005-01039-4

Preservation Briefs 18: Rehabilitating Interiors in Historic Buildings-Identifying Character-Defining Elements. GPO # 024-005-01041-6

Preservation Briefs 19: The Repair and Replacement of Historic Wooden Shingle Roofs. GPO # 024-005-01053-0

Preservation Briefs 21: Repairing Historic Flat Plaster-Walls and Ceilings. GPO # 024-005-01055-6

Preservation Briefs 22: The Preservation and Repair of Historic Stucco. GPO # 024-005-01066-1

Preservation Briefs 23: Preserving Historic Ornamental Plaster. GPO # 024-005-01067-0

Technical Reports

A Glossary of Historic Masonry Deterioration Problems and Preservation Treatments. 68 pp. GPO # 024-005-00870-5

Keeping it Clean: Removing Dirt, Paint, Stains, and Graffiti from Historic Exterior Masonry. 45 pp. GPO # 024-005-01035-1

Moisture Problems in Historic Masonry Walls: Diagnosis and Treatment. 48 pp. GPO # 024-005-00872-1

Appendix E Available Reference Documents

Additional References:

The following is a list, by state, of Air Force properties listed on the National Register of Historic Places, as of December 1991. An updated version can be obtained through the National Park Service, National Register of Historic Places. Properties are listed by: state, property name, and address/boundary. Several of the properties are also National Historic Landmarks (NHL). Several listed properties are on land held by the Department of the Air Force, but not neccessarily on an active Air Force installation.

ALABAMA

Maxwell Air Force Base
Senior Officer's Quarters Historic District
Austin Hall
Community College of USAF

ARIZONA

Luke Air Force Base
El Camino Del Diablo Trail

CALIFORNIA

Edwards Air Force Base
Rogers Dry Lake (NHL)

Los Angeles Air Force Base
500 Varas Square
American Trona Corporation Building

March Air Force Base
March Field

McClellan Air Force Base
Sacramento Air Depot Historic District

Vandenberg Air Force Base
Space Launch Complex 10 (NHL)
Archeological sites

Appendix F Listed Air Force Historic Properties

COLORADO

Lowry Air Force Base
Eisenhower Chapel
General's Quarters
Selected Facilities

US Air Force Academy
Carlton House
Pioneer Cabin

FLORIDA

Cape Canaveral Air Force Station
Launch Pads 5, 6, 13, 14, 19, 26, 34 and Mission Control Center (NHL)

GUAM

Anderson Air Force Base
Northwest Field

HAWAII

Bellows Air Force Base
Archeological sites

Hickam Air Force Base
Hickam Field (NHL)

Wheeler Air Force Base
Wheeler Field (NHL)

KANSAS

McConnell Air Force Base
Air Terminal Building 1

KENTUCKY

Standiford Air National Guard Base
Archeological sites

MISSOURI

Jefferson Air National Guard Station
Jefferson Barracks Historic District

St. Louis Air Force Station
St. Louis AFS Historic District

NEBRASKA

Offutt Air Force Base
Black Smith Shop
Fort Crook Historic District

NEW YORK

Plattsburgh Air Force Base
Old Stone Barracks
Oval Historic District

NORTH CAROLINA

Pope Air Force Base
Hangers 4 & 5
Pope AFB Historic District

OHIO

Wright-Patterson AFB
Wright Brothers Memorial Mound Group
Wright-Patterson AFB Mound
Huffman Prairie Flying Field (NHL)

TEXAS

Brooks Air Force Base
Hanger 9

Carswell Air Force Base
Buck Oaks Farm

Randolf Air Force Base
Administration Building
Hanger 9

U.S. MINOR ISLANDS

Wake Island Territory, Pacific Ocean
Wake Island (NHL)

UTAH

Wendover Air Force Station
Wendover AFS Historic District

WYOMING

F.E. Warren Air Force Base
Fort David A. Russell (NHL)

HQ USAF/CEV Guideline For Cultural Resources Management Plans

The use of the guideline is optional, and it may be modified as needed. CRMPs must be provided to the State Historic Preservation Officer (SHPO) for review. The SHPO should be contacted early and should be involved throughout the planning process. The SHPO can provide valuable assistance, and close coordination will improve cooperation on future actions affecting cultural resources (Dept. USAF, 1991c).

I. General Information

a. Mission Statement
b. Historical Perspective
c. Organizational Listing and Roles
d. Goals and Objectives
e. Program Responsiblities

II. Cultural Resource Inventory

a. Prehistoric Resources
    1. Prehistoric Framework (summarize known prehistory of the area)
    2. Literature Review (what literature is available on the area)
    3. Inventory (summarize archeological data in tabular and textual format)
    4. Areas of Concern (identify areas of high potential for resources)
b. Historic Resources
    1. Historic Overview (summarize history of build environment)
    2. Literature Review (what literature is available on the installation)
    3. Resource Inventory (summarize historic property data)
    4. Areas of Concern (identify areas of possible eligibility)

III. Compliance Procedures

a. Issues (unique cultural resource issues; ex. Native American concerns)
b. Preservation and Mitigation Strategies
    1. Archeological Resources
    2. Historic Resources
    3. Consultation Procedures
    4. Standard Operating Procedures

IV. Summary

Attachments (mitigation plans, inventory forms, programmatic agreements, etc)

Army Regulation 420-40 Outline: Wright-Patterson AFB CRMP Outline

This outline was developed with the assistance of the Tre-Services Cultural Resources Research Center and AR 420-40. Wright-Patterson AFB has found the CRMP to help with budget justification and the overall management of the program (Ferguson, 1992c).

I. Executive Summary (1 page)
II. Introduction
    a. Goals
    b. Policies
    c. Priorities
    d. Budget and Staff
III. Overview
    a. Types of Undertakings
    b. Types of Cultural Properties
    c. Summary of Prehistory
    d. Summary of History
    e. Evaluation of Existing Data
IV. Significant Cultural Resources
    a. Current Inventory
    b. Predictions
    c. Standards of Significance
    d. Schedule for Completion of Inventory
V. Standard Operation Procedures
    a. Section 106 Compliance for Undertakings not covered in the CRMP
    b. Section 110 Compliance (Nominations to the National Register)
    c. ARPA Compliance
        i. permits
        ii. curation
        iii. site files
    d. Inventory Projects
    e. Maintenance, Repair, Alterations, and Demolitions of Historic Buildings
    f. Documentation Standards (HABS/HAER, archeology)
    g. Periodic Reporting of Review Effects
    h. Reporting on Damage to Preservation Districts
    i. Data Recovery Projects
    j. Public and Interested Person Involvement
    k. Annual Report

Appendices (Referenced materials and supporting documentation)

Appendix B: Telephone Interview Sheet and Interview Results

The purpose of these interview questions was to assist in the determination of the content and format of information that was needed in the primer. The questions were unstructured and open-ended in style and were intended only to help generate more in-depth answers. A sample of BHPOs, both MAJCOM and base-level, were interviewed to clarify issues and provide any additional guidance relating to the published information.

Base: Name: Title:
Squadron/Organizational structure: Status of program:

1. What are your duties as Historic Preservation Officer?

2. What publications, regulations, computerized data bases, manuals, or guidance do you find helpful?

3. Is there a reference that is particularly helpful?

4. Would information on the background of historic preservation/cultural resources management be helpful?

5. Would an overview of the USAF cultural resources program be useful?

6. Would a checklist be useful for any certain task?

7. Who do you ask if you have questions?

8. What type of training programs do you feel would be helpful?

9. What needs to be in the primer to ensure proper coordination with the State Historic Preservation Officer and the Advisory Council?

10. What needs to be in the primer to ensure proper coordination through Air Force channels?

11. What else would you like to see covered in a primer?

12. What format should the primer be in (question/answer, topical, etc.)?

Edwards AFB, CA

Rick Norwood
3 APR 92
DSN 527-5876

He is a full-time archeologist working in the EM directorate. They also have some contractor support. The base has everything from A to Z, including pre-historic sites to items related to the space shuttle. The efforts of the office are directed toward specific projects and meeting the compliance requirements of Section 106. They have also done national register evaluations.

The manual from the 3-day course is very useful. Working with Section 106 Step-By-Step, by the Advisory Council, is a very well-written booklet that should be used. Use of flow charts rather than check lists would be helpful in the primer.

It is going to be hard to generalize information in the primer, and have it applicable to all bases. The only thing in common is the Federal law. Otherwise things very a lot from location to location. Some of the factors include: size of the base, level of Native American concern, any local powerful historic preservation interest group, the approach of the State Historic Preservation Office, and weather or not the position on the Air Force base is a full-time job or an additional duty.

The source they use for help will vary with the issue: for environmental documentation, use the chain of command or the Legacy program; for section 106, deal with SHPO; for policy issues, talk to everybody; for archeological items, rely on the network of contacts developed as a professional.

Many good training programs are available from the University of Nevada. At one time the Air Force also had a program at Tyndall AFB.

No effect findings need to be coordinated with the SHPO. A lot of people overlook this requirement.

It is very important for the base to have only one contact with the SHPO. There should be direct contact with SHPO and preservation officer.

It is necessary to get the JAG involved. A relationship also needs to be established with the base commander. On base coordination will depend on local base policies. The coordination process they use includes: a report from their contractor, routing to his boss, to JAG, to XR, to PA, to hospital, to Base Commander, and to the SHPO. Sometimes getting the documentation off the base is often a bigger battle than dealing with the SHPO.

The Primer should be geared to the non-specialist. They have a continual problem of educating people on the process. He suggested the primer should be approximately 12 pages long, or so, with lots of pictures. It should also include a flow chart of the requirements. The Primer needs to include a strong section on the penalties for noncompliance. We should include information explaining that there is more than one law that needs to be followed.

Luke AFB, AZ

Natasha Kline
10 April 92
DSN 853-3621

She is the Natural Resource Program Manager working in the Civil Engineering Environmental shop. The majority of her time is spent on natural resource issues associated with the range, for example endangered species issues. The installation has a historic trail out on the range that is listed. They have not had the manpower to have as robust a historic preservation as she would like.

They have used the existing Air Force regulation, but not much else. A step-by-step guide would be helpful. Any overview of cultural resource protection should highlight the concerns. Checklists for tasks are useful, but they should be kept simple.

They turn to the SHPO when they have questions. The Primer should make the point that Air Force personnel should see the agencies as an ally, and not only as a regulator.

It is important to get information out to the rest of Civil Engineering. It is also a good idea to have a working group on the Environmental Protection Committee (EPC).

In summary, the Primer should contain the following: a chapter on regulations, specific responsibilities of base historic preservation officers, and a trouble-shooting guide.

Kelly AFB, TX

Charles Laughlin
3 April 92
DSN 945-3100 ext. 233

He has responsibility for EIAP and also historic preservation. It is a one-person shop. The historic preservation responsibility is almost a full-time job. His position is part of the EM directorate. The base is in the process of getting a preservation plan prepared by the COE. They previously had some work done on both archeological sites (pretty good) and also a historic preservation survey (which is being redone). They have a historic district and also separate facilities. They will also develop a brochure for housing occupants use.

They live by 36 CFR. It should be noted that the process has changed in recent years. The advisory council does not need to be involved in all cases (only the SHPO is necessary).

However, they send a letter to both, just to keep the SHPO motivated to give a timely review, and to start the clock running if the advisory council does need to resolve any issues. Bottom line --- you can shortcut the system.

They are not putting a lot of stuff on the register at this point. He is not so sure that it is smart in the long run.

No checklists are needed.

They alert the MAJCOM on issues. The Corps of Engineers is who they turn to for information.

Most of the work comes from the housing area. They coordinate with SHPO on the 106 process. Base historic preservation officers need to establish contacts with the SHPO.

With regard to coordinating through Air Force channels, the base historians will like to get involved in historic preservation issues. However, it can cause problems in that they may want to run things, and go overboard.

They use the AF from 813 to monitor projects. They review over 2000 of them a year. They also review requests for proposals (RFP), plans and specs, and submittals on construction projects for compliance.

The primer needs to educate the Base Commander and also the DE. The primer needs to cover highlights for the commander. It should note the legal aspects and possibility of anybody filing a lawsuit for non-compliance.

All bases should do a survey. This can be updated every 2 to 5 years. It is advisable to have the COE do the contracting for any survey work. Environmental compliance funding can be used for this work.

McConnell AFB, KS

Mike Crouse
22 April 92
DSN 743-3887

He is not the official BHPO. That responsibility is technically assigned to the real estate branch. He works in the environmental branch of the Civil Engineering Squadron. They have one building on the national register, and a couple of others pending on the state or national list. He is in the process of drafting a base preservation plan.

They do not use any particular reference. An overview of the program might be helpful in the Primer. It could contain a checklist on the overall process. They have been learning by doing. They rely on Bill Metz at F. E. Warren AFB for information.

They are interested in getting guidance on the preparation of a historic preservation plan. There is no urgent need for a primer.

They do any on-base coordination needed through the base Facilities Board. He suggested that the Primer outline the procedures that need to be followed and also provide a hands on example or case study.

Randolph AFB, TX

Scott Shepard
3 April 92
DSN 487-4788

He works in the Environmental Planning section of the Civil Engineering Squadron. His position is 20% community planner and 80% historic preservation. They are currently working with the National Park Service to develop a preservation plan, a maintenance plan, a programmatic agreement and finally, a nomination package. The Park Service is handling all the contract arrangements. The cost of the effort will be approximately $120,000. The installation has 120 buildings and 350 housing units that are potentially eligible.

For references they use AFR 126-7 and the Act itself. The University of Nevada offers good training programs. He has a 2" thick handbook and a 2" thick reference book that he uses a lot.

The Primer should explain the National Historic Preservation Act. It should note and explain that this Act is not just another Air Force regulation. The Federal aspect should be emphasized. Note that this is a mandatory program, not an optional undertaking.

Old Buildings need to be treated as though they are listed until a determination is made that they are not.

Section 106 coordination needs to be completed prior to doing a project. Base personnel need to plan for the time it takes for the coordination process. The Primer could use a checklist of the 106 process. Effect, no effect, no adverse, and adverse effect need to be covered.

Base personnel need to talk to the SHPO. It is important not to get to many people involved. Lots of USAF people want the face time in the process. Not having a single point of contact with the SHPO will cause problems.

Having a single point of contact from the base is very important. You get a letter from the Secretart of Defense if you screw up. You need a base historic preservation committee. Coordination with JAG and HQ is also necessary.

They had to fight with the MAJCOM to get the money for the survey. You need to coordinate with SHPO on each prcject if no programmatic agreement.

Interest in the process has to flow downhill from the base leadership. People need to understand that delays are possible. They need to understand it is federal law. You need a good relationship with the SHPO.

The Primer should give a basic outline of the program. Then use a question and answer format.

Barksdale AFB, LA

Airman Keith Strom
20 April 92
DSN 781-4601

He works in the DEV section under the 2nd Support Group. The job is getting to be full time. The base has 150 facilities in the process of being evaluated. They anticipate that they will have a historic district and also several other facilities. The SHPO did the survey.

He put his own collection of information together. Working with 106, 36 CFR part 800 provides most of the information that is needed.

The Primer could include checklists. Information on the 106 process is needed. The Primer should also contain guidance on how to inventory the facilities you have. For example, how to research the dates of the facilities and how to track the inventory of facilities on base.

They talk to the SHPO and also the Advisory Council Western Office. Bill Metz at F.E. Warren AFB is also used frequently as a source of information.

It is important to stay in contact with the agencies. They are in the process of reviewing the standard Programmatic Agreement, which they received form the Council.

It is important to educate those on the base. It needs to be known that the requirements for doing this is the law, not just the wish of some local preservation group. Base staff need to know that the program will not progress. They are still in the process of setting up a system on base t o ensure coordination and compliance.

Staff should plan ahead for the facilities that may one day become eligible. Their SHPO says that military facilities generally get on the register.

Standiford Field ANG, KY

Capt. Philip Howard
3 April 92
DSN 989-4602

He is a resources officer working in DEM of the unit. Historic preservation is an additional duty. The installation has one 6000 yr old Native American burial mound, which has been identified on the register. They also have a 1800's farm site which is in the process of getting on the register.

They have no guidance, and that is the problem. He relies on the SHPO for information. Yes, we should provide some information on the background of historic preservation. People need to know why the program exists or why they have to do what they do.

Flow charts are the most helpful. The outline of the Primer should be kept simple. Include a flow chart of the overall process. This should be kept simple. The Primer should also include a list of what training is available.

They rely on the SHPO to answer any questions. It is important to make initial contact with the SHPO. The SHPO should be in the loop at all times. Any important information should be put in a letter.

The historic preservation official may need to go over the head of somebody that is impeding the process.

HQ MAC, Scott AFB, IL

Dr. Robin Burgess
3 April 92
DSN 576-5764

HQ MAC/LEVP is in the process of reorganizing. Dr. Burgess deals with cultural resources only.

Guidance that is used includes: AFR 126-7, CFR, Section 106 manuals, Sec. of Interior standards, federal newsletters, and tracking systems.

The Primer could contain a small section on cultural resource goals and ideas. Checklists for tasks could be included.

Applicable training programs include: Section 106 from the Advisory Council, site protection from the National Park Service, and a course on maintaining structures.

The Primer should cover who interested parties may be in the coordination process. Air Force reorganization should be addressed. Include information on HABS/HAER. The Cold War and potential issues should also be covered.

A topical outline is preferred. A list of references is also a good idea.

HQ AFLC, Wright-Patterson AFB, OH

Lynn Engelman
2 April 92
DSN 787-4920

Information that is helpful to the historic preservation officer includes: the 3 day section 106 course by the Advisory Council, the programmatic agreement course from the University of Reno, the WIMS management screen, and other Advisory Council courses. The desk reference is most helpful.

The Primer should contain the same historical highlights used in the Council course. Checklists on the following would be useful: statements of work, programmatic agreements, historic structures, and archeology. Programmatic agreements should be reviewed by the MAJCOM.

A loose-leaf 3-ring binder format would be most applicable for the Primer. This will allow personnel to update and add information.

Dover AFB, MD

Joe Puturmo
22 April 92
DSN 445-6816

He works as the base Community Planner in the Planning and Programming branch (DEEP) in the base civil engineering squadron. The base is working the status of one World War II hanger with the SHPO. They have an archeological survey of the installation stalled at the moment. The survey is part of a $39,000 agreement with the Park Service. They also have a potential archeological site on an IRP site.

The ECAMP inspection was helpful. They rely on the SHPO and HQ MAC for guidance on issues. He has attended the DOD historic preservation course.

The Primer should cover archeology laws and when surveys are needed. We need information on how to protect sites. Staff need to know that they need to keep quiet on the existence of sites. Information on the need for archeological surveys is needed. For instance, do surveys need to be done as part of each MILCON project. How does the checklist for compliance which is attached to the DD Form 1391 relate. Training programs on how to develop a Programmatic Agreement would be helpful. They have a good relationship with the SHPO. The base should be in contact with the SHPO.

There is a need for the engineering community to take cultural resources seriously. The issue of dealing with an unplanned discovery needs to be addressed. Where should the money to deal with such an event come from?

The following items might be included: possible funding sources (e.g. in design package), the basic legal steps required, explanations of section 106 and 110, a list of definitions, a reference list, and a case study.

Appendix C: Sources for Data Matrix

Federal Law / Executive Order

National Historic Preservation Act of 1966 (NHPA)
Antiquities Act of 1906
Historic Sites Act of 1935
Land and Water Conservation Act of 1974
National Environmental Policy Act of 1969 (NEPA)
Reservoir Salvage Act of 1960
Archeological and Historical Preservation Act of 1974
Archeological Resources Protection Act of 1979 (ARPA)
Protection and Enhancement of the Cultural Environment, Executive Order of 1971
Public Buildings Cooperative Use Act of 1976
American Indian Religious Freedom Act of 1978
Native American Graves Protection and Repatriation Act of 1990
Department of Defense Appropriations Act of 1991 (Legacy Program)

Federal Regulations

36 CFR 800	Protection of Historic and Cultural Properties
43 CFR 3	Antiquities Act of 1906
36 CFR 60	National Register of Historic Places
36 CFR 63	Determinations of Eligibility for Inclusion in the National Register of Historic Places
36 CFR 65	National Historic Landmarks
36 CFR 65	Proposed Guidelines for Recovery of Scientific, Prehistoric, Historic, and Archeological Data
36 CFR 68	Secretary of the Interior's Standards for Historic Preservation Projects
36 CFR 78	Waiver of Federal Agency Responsibilities Under Section 110 of NHPA
36 CFR 79	Curation of Federally-Owned and Administrated Archeological Collections
32 CFR 229	Protection of Archeological Resources: Uniform Regulations

Training Programs/Workshops

Introduction to Federal Projects and Historic Preservation Law Course
Department of Defense Cultural Resources Workshop 1992
NPS Directory of Training Opportunities in Cultural Resources Management
Army/COE Historic Structures Maintenance and Repair Course Bulletin

Implementing Agency Publications/Interviews

Advisory Council Interviews/Publications

Advisory Council/Senior Architect Interview
Advisory Council/Air Force Historic Preservation Specialist Interview (Naber)
Fact Sheet: Council Publications
Participant's Course Book: Introduction to Federal Projects & Historic Preservation Law
Participant's Desk Reference
Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities
Working with Section 106: Guidelines for the Review Process Established by 36 CFR 800
Public Participation in Section 106 Review: A Guide for Agency Officials
Treatment of Archeological Properties: A Handbook
Consulting About Archeology Under Section 106

National Park Service Interview/Publications

National Park Service/Archeology Division Interview (McKeown)
Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings
Guidelines for Local Surveys: A Basis for Preservation Planning
Catalog of Historic Preservation Publications
Guide to Cultural resource Management Bulletin Articles 1978-1988
A National Strategy for Federal Archeology
What are the National Register Criteria?
Questions and Answers About Historic Properties Survey
Is There Archeology in Your Community?
Questions and Answers About the "SHPO"
Interpreting the Secretary of the Interior's Standards for Rehabilitation
How to Complete National Register Forms
The National Historic Landmarks Program Common Questions and Answers

Choosing an Archeological Consultant
Archeology and the Federal Government (CRM Bulletin)
Legal Background of Archeological Resources Protection
What is the National Historic Preservation Act
Historic Preservation and Historic Properties
A History of the Historical Sites Survey and National Historic Landmarks Program
Preservation Brief Series: Technical Preservation Services
Guidelines for Federal Agency Responsibilities Under Section 110

DOD Directives/Programs/Regulations/Publications

Defending Our Heritage Report to the Cultural Resources Program
Legacy Resource Management Program: Report to Congress 1991
AFR 126-7
AFR 19-7 (Draft)
Army Regulation 420-40
HQ USAF/CC letter
HQ USAF/CE Strategic Goals
HQ USAF/CEV Historic Preservation Plan Guidelines
USAF Commander's Guide to Air Force Historic Preservation (Unpublished)
USAF Commander's Guide to Environmental Quality
Army/COE Historical and Archeological Survey Reports
USAF Environmental Compliance Assessment and Management Program (ECAMP)
Army/COE Historic Building Preservation Services Bulletin
USAF Land Use Planning Bulletin
USAF Comprehensive Planning Approach and Process Bulletin
USAF Master Statement of Work for Preparation of Base Comprehensive Plans
USAF Small-Area Development Planning Bulletin
HQ USAF/LE Base Comprehensive Planning Slide Show
HQ USAF/CEVP Interview
HQ USA/CEHSC-FN Interview
HQ AFMC/CEVP Interview
USAF 2750 ABW/EM Interview
USAF 90 CSG/DEV Interview
USAF Natural/Cultural Resource Conference Proceedings
HQ USAF/LEE WIMS-ES Program Management Directive
HQ USAF/CE WIMS-ES Research Analyist Interview
HQ USAF/CEV Programming and Budgeting Message

Other Sources/Data Bases

Colorado SHPO Guidelines
ETIS/ITS subsystem Data Base (CELDS), University of Illinois-Urbana
WIMS-ES Cultural Resources Module (Draft)

Appendix D: Interview Topic and Sub-Topic Issues for Data Matrix

Introduction

Purpose of the Primer
Who Should Read the Primer

Overview of Cultural Resources Management Policy

Goals
Historical Perspective: A Development of the U.S. Conscience
Penalties for Non-Compliance
What is Most Important? (Section 106)

Legislation

Relevant Legislation, Regulations, and Executive Orders
Cultural Resource Protection Law and the Players
Key Non-Air Force Players

The Section 106 Process

Participants
Undertaking and Area of Potential Effect
The Five-Step Process
The Programmatic Agreement & CRMP

Air Force Cultural Resource Management/Planning Processes

Governing USAF Regulations (Current and Future)
Base-Level Staff
MAJCOM and Air Staff
Air Force Support Agencies
Legacy Program
Integrating EIAP (NEPA) and Section 106
Relationship to the Base Comprehensive Plan
Management Tools
Funding Issues

How Can You Make this All Work?

Relationship With the SHPO and Interested Parties
Identifying Your Resources
Minimizing Problems
Getting an Inventory Done and a CRMP Prepared
Training Programs
Where to Get Information

Appendix E: Draft and Revised Outlines

Draft Outline

1.0 Introduction

- 1.1 Purpose of the Primer
- 1.2 Who Should Read the Primer
- 1.3 Defining Cultural Resources

2.0 Overview of Cultural Resources Management

- 2.1 Air Force Goals
- 2.2 Historical Perspective: A Development of the US Conscience
- 2.3 What is Cultural Resource Management? (A summary of the players/process)
- 2.4 Penalties for Non-Compliance

3.0 Legislation

- 3.1 Relevant Legislation
- 3.2 Federal Regulations and Executive Order

4.0 The Section 106 Process

- 4.1 Participants
  - Air Force (The Federal Agency)
  - SHPO
  - Local Community
  - The Advisory Council
  - The National Park Service (The Keeper)
- 4.2 The Five Step Process
  - (1) Identification and Evaluation of Historic Properties
    - Undertaking and Area of Potential Effect
    - The National Register
    - The Criteria, Exceptions, Integrity
    - The Evaluation Process
  - (2) Assessing Effects

Revised Outline

1.0 Introduction

- 1.1 Purpose of the Primer
- 1.2 Historical Perspective

2.0 Overview of Cultural Resources Management

- 2.1 What is Cultural Resource Management?
- 2.2 Defining Cultural Resources
- 2.3 Implementing Air Force Goals and Policy
- 2.4 Benefits to the Air Force
- 2.5 Successful Base-Level Programs

3.0 Complying With The Law

- 3.1 Federal Law
- 3.2 State Law
- 3.3 DOD Directive
- 3.4 Air Force Regulations
- 3.4 Avoiding Non-Compliance

4.0 Cultural Resource Management/Planning Processes

- 4.1 Base Level Staff
- 4.2 Where to Get Training
- 4.3 Where To Get Assistance
- 4.4 Working With SHPO
- 4.5 Management Tools
- 4.6 Funding Issues and the A-106 Process
- 4.7 Relationship to the Base Comprehensive Plan
- 4.8 Minimizing Problems

5.0 Working With Section 106 of NHPA

- 5.1 Participants
- 5.2 Identifying and Evaluating Properties
- 5.3 Assessing Effects
- 5.4 Consultation and Comment
- 5.5 Proceeding

Bibiliography

Advisory Council on Historic Preservation (ACHP). Legacy Resource Management Program Survey, United States Department of Defense. Champaign IL: USA Construction Engineering Research Laboratory, November, 1991a.

-----. Balancing Historical Preservation Needs with the Operation of Highly Technical or Scientific Facilities. Washington DC: Government Printing Office, 1991b.

-----. About the Council: A Fact Sheet. Washington DC: Government Printing Office, June 1990.

-----. Federal Historic Preservation Case Law. Washington DC: Government Printing Office, 1985.

-----. Fact Sheet: Working With Section 106. Washington DC: Advisory Council on Historic Preservation, August 1984a.

-----. National Historic Preservation Act of 1966, as amended. Public Law No. 89-665 and 91-243, 93-54, 94-422, 94-458, 96-244, 96-515. Washington DC: Government Printing Office, 1984b.

Advisory Council on Historic Preservation and GSA Interagency Training Center (ACHP and GSA). Introduction to Federal Projects and Historic Preservation Law, Training Session Lecture. Cleveland OH, April, 1992.

-----. Introduction to Federal Projects and Historic Preservation Law: Participant's Course Book. Washington DC: Government Printing Office, November 1991a.

-----. Introduction to Federal Projects and Historic Preservation Law: Participant's Desk Reference. Washington DC: Government Printing Office, November 1991b.

Akers, Donna, Cultural Resource Program Manager. Personal correspondence. HQ USAF/CEVP, Washington DC, 13 May 1992a.

-----. Personal correspondence. HQ USAF/CEVP, Washington DC, 25 January 1992b.

-----. Telephone interview. HQ USAF/CEVP, Washington DC, 24 January 1992c.

Babbitt, Bettina A. and Nystrom, Charles O. Questionnaire Construction Manual. Alexandria VA: U.S. Army Institute for the Behavioral and Social Sciences, June 1989.

Berke, Arnold, "Viewpoint," Historic Preservation News, 23:4 (November/December 1986).

Carnett, Carol. Legal Background of Archeological Resources Protection. Washington DC: US Department of the Interior, National Park Service, June 1991.

Civil Engineer, Office of the Air Force . "Quality Management: AF/CE Core Purpose, Guiding Principles, Vision, Planning Objectives, and Strategic Goals." Report to Air Force Civil Engineering personnel. Washington DC: HQ USAF/CE, 5 December 1991.

Clark, Dr. A. Ludlow, Chief Air Force Natural Resources. Telephone interview. AFCEE, Bolling AFB DC, 27 July 1992a.

-----. Telephone interview. AFCEE, Bolling AFB DC, 23 June 1992b.

-----. Personal correspondence. AFCEE, Bolling AFB DC, 26 April 1992c.

-----. Personal correspondence. AFCEE, Bolling AFB DC, 24 January 1992d.

-----. Telephone interview. AFCEE, Bolling AFB DC, 21 January 1992e.

The Conservation Foundation and the National Center for Preservation Law (CF & NCPL). A Handbook on Historic Preservation Law. Baltimore MD: Urban Litho, Inc., 1983.

Cullinane, John J., Senior Architect. Telephone interview. The Advisory Council on Historic Preservation, Washington DC, 12 August 1992a.

-----. Personal correspondence. The Advisory Council on Historic Preservation, Washington DC, 15 May 1992b.

-----. Telephone interview. The Advisory Council on Historic Preservation, Washington DC, 21 January 1992c.

Dean, Sally Ann. Fort Irwin Historic Preservation Plan. San Francisco CA: US Department of the Interior, National Park Service, Western Region, April 1986.

Department of the Air Force. Cultural Resource Management. AFD 19-7 Draft. Washington DC: HQ USAF, 30 September 1992a.

-----. Proceedings of the Air Force Natural and Cultural Resources Strategic Planning Conference. Alexandria VA, 17-18 March 1992b.

-----. "Programming and Budgeting for AF Natural and Cultural Resources Programs." Electronic Message. P 312330Z, 31 January 1992c.

-----. Airmen Communities. Washington DC: The Government Printing Office, 1992d.

-----. "Work Information Management System-Environmental Subsystem (WIMS-ES) A-106 Module PMD." Washington DC: HQ USAF/LEE, September 1991a.

-----. "Guidelines for Consultation with Native Americans." Washington DC: HQ USAF/CEV, 16 May 1991b.

-----. "Guidelines for Historic Preservation Plans." Washington DC: HQ USAF/CEV, 25 April 1991c.

-----. Environmental Compliance and Management Program,Volume V, Natural and Cultural Resources Management. Washington DC: HQ USAF, January 1991d.

-----. Area Development Planning Bulletin. Alexandria VA: Noritake Associates and EDAW Associates, 1991e.

-----. Commander's Guide to Environmental Quality. Washington DC: Ft. Walton Beach FL: Spectrum Sciences & Software, Inc., 1991f.

-----. "Base Comprehensive Planning (BCP)." Briefing Slides. Washington DC: HQ USAF/LE, 1990.

-----. Comprehensive Planning Approach and Process. Base Comprehensive Planning Bulletin. Atlanta GA: EDAW Inc., 1989a.

-----. Quality of Life Planning Bulletin. San Fransico CA: EDAW, Inc., 1989b.

-----. Natural Resources: Historic Preservation. AFR 126-7. Washington DC: HQ USAF, 28 August 1987.

-----. Land Use Planning Bulletin. Washington DC: Rogers, Goldern & Halpern, 1 August 1986.

Department of the Air Force and the National Park Service. Interagency Agreement for Professional and Technical Assistance in Managing and Protecting Cultural Resources. Washington DC, 5 February 1992.

Department of the Army. Tri-Services Cultural Resources Research Center. PAM; No. EN-92/01. Champaign IL: USA-CERL, 1992.

-----. Historic Building Preservation Services: USA Corps of Engineers Seattle District. Washington DC: Government Printing Office, February 1991.

Department of Defense. Report to Congress: Legacy Resource Management Program. Champaign IL: USA Construction Engineering Research Laboratory, September 1991.

Department of the Interior. The Native American Graves Protection and Repatriation Act. National Park Service Memorandum W3823(436), Washington DC, 30 October 1991.

Devereaux, Capt Richard T. Fraternization in the United States Air Force: Development of a Policy Booklet. MS thesis, AFIT/GSM/LSR/88S-5. School of Systems and Logistics, Air Force Institute of Technology (AU), Wright-Patterson AFB OH, September 1988 (AD-A201588).

Emory, C. William. Business Research Methods. Homewood IL: Irwin, 1991.

Engleman, Lynn, HQ AFMC Historic Preservation Officer. Personal correspondence. Wright-Patterson AFB OH, 27 July 1992a.

Lavery, Capt Thomas E. Development of a User's Guide for the Civil Engineering Work Information Management System. MS thesis, AFIT/GEM/LSM/88S-10. School of Systems and Logistics, Air Force Institute of Technology (AU), Wright-Patterson AFB OH, September 1988 (AD-A201542).

Lewis, Roger K. Shaping the City. New York: AIA Press, 1986.

Lillie, Maj Tom, Chief of Natural and Cultural Resource Programs. Personal correspondence. HQ USAF/CEVP, Washington DC, 27 July 1992a.

-----. Personal correspondence. HQ USAF/CEVP, Washington DC, 13 May 1992b.

Mackintosh, Barry. The Historic Sites Survey and National Historic Landmarks Program: A History. Washington DC: National Park Service History Division, 1985.

Makuta, Daniel J. and Lawrence, William F. The Complete Desktop Publisher. Greensboro NC: COMPUTE! Publications, Inc., 1986.

Mann, Diane K. and others. User's Guide for Cultural Resources Information Bulletin Board (CRIBB). USA-CERL Technical Report; No. N-88/02. Champaign IL: USA-CERL, October 1987.

McDermon, Capt John C. Lecture notes distributed in ENVR 540, Environmental Planning, School of Engineering and Services, Air Force Institute of Technology (AU), Wright-Patterson AFB OH, April 1992.

McKeown, Dr. Tim, Chief Archeologist. Personal correspondence. National Park Service, Washington DC, 13 March 1992.

McPeak, Merrill A., Air Force Chief of Staff. Environmental Leadership. Official letter to all Air Force members. Washington DC: HQ USAF, 17 April 1991.

Metz, William, Chief Environmental Branch. Personal correspondence. F.E. Warren AFB, Cheyenne WY, 30 July 1992a.

-----. Telephone interview. F.E. Warren AFB, Cheyenne WY, 23 June 1992b.

-----. Telephone interview. Wright-Patterson AFB OH, 14 May 1992b.

-----. Telephone interview. Wright-Patterson AFB OH, 2 April 1992c.

Ferguson, Dr. Jan, Base Historic Preservation Officer. Personal correspondence. Wright-Patterson AFB OH, 27 July 1992a.

-----. Telephone interview. Wright-Patterson AFB OH, 23 June 1992b.

-----. Personal correspondence. Wright-Patterson AFB OH, 13 May 1992c.

-----. Personal Interview. Wright-Patterson AFB OH, 1 May 1992d.

-----. Class handout distributed in ENVR 540, Environmental Planning. School of Civil Engineering and Services, Air Force Institute of Technology (AU), Wright-Patterson AFB OH. April 1992e.

-----. Personal interview. Office of Environmental Management, Wright-Patterson AFB OH, 29 August 1991.

Fink, Robert, Advisory Council on Historic Preservation Section 106 Instructor. Personal interview. Section 106 Course, Cleveland OH, 7 April 1992.

Foxall, Horace H. Jr. Architect Seattle Corps of Engineers. Personal correspondence. Seattle WA, 23 January 1992.

Freeman, Dr. Lawrence H. and Bacon, Dr. Terry R. Style Guide. Bountiful UT: Shipley Associates, 1990.

Grosser, Roger D. Historical Property Protection and Preservation at US Army Corps of Engineers Projects. Technical Report EL-91-11, Vicksburg MS: US Army, Waterways Experiment Station, August 1991.

Hosmer, Charles B. Preservation Comes of Age. Charlottesville VA: University Press of Virginia, 1981.

-----. Presence of the Past. New York: G.P. Putnam's Sons, 1965.

Jones, Ed. PC Magazine Guide to Word 2.0 for Windows. Emeryville CA: Ziff-Davis Press, 1992.

-----. Telephone interview. F.E. Warren AFB, Cheyenne WY, 3 June 1992c.

-----. Briefing slides from DOD Cultural Resources Workshop. F.E. Warren AFB, Cheyenne WY, 4-8 May 1992d.

-----. Telephone interview. F.E. Warren AFB, Cheyenne WY, 21 January 1992e.

-----. Commander's Guide to Historic Preservation. Unpublished document. F.E. Warren AFB, Cheyenne WY, undated.

Morris, William and others. American Heritage Dictionary. Boston MA: Houghton Mifflin Co, 1985.

Naber, MaryAnn, Historic Preservation Specialist. Personal correspondence. Advisory Council on Historic Preservation, Washington DC, 15 March 1992.

National Park Service (NPS). "A Directory of Training Opportunities in Cultural Resources Management," CRM, 14: 5-15 (October 1991a).

-----. The Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Washington DC: Government Printing Office, 1991b.

-----. 36 CFR Part 79 Curation of Federaly Owned and Administered Archeology Collections. Washington DC: National Park Service, Cultural Resources Programs Division, 1991c.

-----.Catalog of Historic Preservation Publicaions. Washington DC: National Park Service, Cultural Resources Programs Division, 1990.

-----. Federal Historic Preservation Laws. Washington DC: National Park Service, Cultural Resources Programs Division, 1989.

Neumann, Loretta, Historic Preservation Consultant. Telephone interview. CEHP Inc., Washington DC, 21 January 1992.

Neumann, Loretta and others. Defending Our Heritage. Preliminary Report. Legacy Resource Management Program, Washington DC, November 1991.

Price, Jonathan and others. How to Write a Computer Manual. Menlo Park CA: The Benjamin/Cummings Publishing Company, Inc., 1984.

Ramirez, Dr. Constance, Headquarters Army Historic Preservation Officer/Acting Chief Natural and Cultural Resources. Telephone interview. Fort Belvoir VA, 27 July 1992a.

-----. Personal Correspondence. Fort Belvoir VA, 1 June 1992b.

-----. Telephone interview. Fort Belvoir VA, 22 April 1992c.

-----. Telephone interview. Fort Belvoir VA, 24 January 1992d.

Ritvo, Ken and Kearsley, Greg. Desktop Publishing. La Jolla CA: Park Row Press, 1987.

Smith, George S. and McManamon, Francis P. "Archeology and the Federal Government," CRM, 11: Special Issue, (July 1988).

Spanne, Larry, Supervising Archeologist. Personal correspondence. Vandenberg AFB CA, 29 July 1992a.

-----. Telephone interview. Vandenberg AFB CA, 23 June 1992b.

-----. Personal correspondence. Vandenberg AFB CA, 14 May 1992c.

-----. Telephone interview. Vandenberg AFB CA, 22 January 1992d.

Tobin, Capt Ken. Class handout distributed in ENVR 540, Environmental Planning. School of Civil Engineering and Services, Air Force Institute of Technology (AU), Wright-Patterson AFB OH, 13 May 1992.

Winks, Robin. The Future of the Past. New York: Watson-Guptill Publications, 1976.

Woodward, Susan L. and McDonald, Jerry N. Indian Mounds of the Ohio Valley. Blacksburgh VA: The McDonald and Woodward Publishing Company, 1986.

Vita

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In May of 1986 Mr. Becker accepted employment with the U.S. Air Force as a pavements engineer. In September of 1986 he entered the position of base community planner/contract programmer working in 91 CES/DEEV, Minot Air Force Base, North Dakota. In February of 1989 Mr. Becker was selected for Chief of Construction Management, Missile Engineering Branch, 857 Civil Engineering Squadron, Minot AFB. Mr. Becker entered the School of Civil Engineering and Services and subsequently the School of Engineering, Air Force Institute of Technology, in May 1991.

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Vita

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REPORT DOCUMENTATION PAGE

Form Approved
OMB No. 0704-0188

1. AGENCY USE ONLY (Leave blank)	2. REPORT DATE	3. REPORT TYPE AND DATES COVERED
	September 1992	Master's Thesis

4. TITLE AND SUBTITLE
CULTURAL RESOURCES MANAGEMENT IN THE UNITED STATES AIR FORCE: DEVELOPMENT OF A PLANNING PRIMER

5. FUNDING NUMBERS

6. AUTHOR(S)
Steven R. Becker, GS-11
Russell R. Hula, Captain, USAF

7. PERFORMING ORGANIZATION NAME(S) AND ADDRESS(ES)
Air Force Institute of Technology, WPAFB OH 45433-6583

8. PERFORMING ORGANIZATION REPORT NUMBER
AFIT/GEE/CEM/92S-4

9. SPONSORING / MONITORING AGENCY NAME(S) AND ADDRESS(ES)

10. SPONSORING / MONITORING AGENCY REPORT NUMBER

11. SUPPLEMENTARY NOTES

12a. DISTRIBUTION / AVAILABILITY STATEMENT
Approved for public release; distribution unlimited

12b. DISTRIBUTION CODE

13. ABSTRACT *(Maximum 200 words)*

The purpose of this study was to produce a USAF base-level primer for use as a guide to requirements, standards, and procedures concerning the preservation of cultural resources. Cultural resources include buildings, sites, districts, structures, and objects that have significant scientific, historic, or cultural value. The research had two major objectives: (1) Identify existing sources of cultural resource information through a review of legal requirements, regulations, USAF policy documents, and other sources such as data bases. (2) Produce a "cultural resources management primer" after identifying the appropriate characteristics of a primer. This product could then be used by novice personnel charged with satisfying USAF cultural resource obligations. The study found that there is an immense amount of evolving information available concerning cultural resources. Information, from an exploratory research, specialized training, and interviews, was integrated into the document. The information compiled in the primer is a very small fraction of the knowledge that is needed to successfully manage a cultural resources program at an Air Force installation. The primer does, however, provide a starting point from which new personnel can gather the knowledge and skills to do the job. The "Cultura Resources Management Primer," produced from this research, is a stand-alone document. Issues covered in the primer include an overview of cultural resources management, compliance requirements, management/planning processes, and references to technical data. Based upon an "Expert Panel" validation as a training tool, the authors recommend the primer be disseminated by USAF MAJCOMs and training courses.

14. SUBJECT TERMS	15. NUMBER OF PAGES
Culture, Preservation, Environmental Protection, Environmental Impact Environmental Management, Architecture, Archeology, Environment	225
	16. PRICE CODE

17. SECURITY CLASSIFICATION OF REPORT	18. SECURITY CLASSIFICATION OF THIS PAGE	19. SECURITY CLASSIFICATION OF ABSTRACT	20. LIMITATION OF ABSTRACT
Unclassified	Unclassified	Unclassified	UL