



Department of Defense Legacy Resource Management Program

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Assessing Cultural Resources on U.S. Military Installations through the Application of Criterion B

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EXECUTIVE SUMMARY

The chronicles of the United States are rife with important individuals who served in the U.S. military and influenced history and the built environment. The National Register of Historic Places (NRHP) is a list of significant buildings, structures, districts, objects, and sites that are associated with significant historic events, historic trends, or historically significant people; embody the distinctive characteristics of a type, period, or method of construction, or represent the work of a master; or have the potential to yield significant information. There are, comparatively speaking, very few properties listed in the NRHP for their association with historically important individuals. This is ironic because the United States prides itself on the promotion of individuality.

This Department of Defense Legacy Resource Management Program report explores the trends for the use of Criterion B, association with persons significant in our past, when listing properties in the NRHP. The report also provides guidance for the use of Criterion B, including methods for the identification of properties that may be listed under Criterion B and guidelines to assess a property's significance under Criterion B through a written history. The report provides management recommendations for properties eligible for the NRHP under Criterion B and proposes five principles to guide mitigation measures for adverse effects to such properties.

The second part of this report is a case study of Marine Corps Base Quantico and one of its early commanding generals, Major General Smedley Darlington Butler. The Quantico Marine Corps Base Historic District was listed in the NRHP under Criteria A and C in 2001. In 2008, a draft nomination form was completed to list the Commanding General's Quarters (Building 1), as a contributing structure to the historic district in the NRHP under Criterion B. Based on Major General Butler's extensive contributions to Marine Corps aviation, Marine Corps sports (e.g., football), and Marine Corps education at Marine Corps Base Quantico, recommendations are made for the evaluation of additional properties under Criterion B at Marine Corps Base Quantico. The most important of these properties is Butler Stadium.

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1.0 INTRODUCTION

1.1 OVERVIEW

The Department of Defense (DoD) is required by the National Historic Preservation Act of 1966, as amended, (NHPA) to identify and manage historic properties (properties that are listed in or eligible for listing in the NRHP on its installations. An examination of all properties listed in the NRHP shows that few historic properties are listed under Criterion B, relating to an association with historically significant individuals. This seems counter-intuitive in a country that prides itself on individuality and that has celebrated the accomplishments of individuals throughout history. This project examines the use of Criterion B (association with historically significant individuals) as reflected by the properties listed in the NRHP, and provides guidance on the application of Criterion B for evaluating military properties and suggestions on management and mitigation of properties eligible for the NRHP under Criterion B. The project also involves a pilot study exploring the life of a prominent military figure, Major General Smedley Darlington Butler, documenting his contribution to military history and the built environment of the Marine Corps Base (MCB) in Quantico, Virginia.

1.2 GOALS AND OBJECTIVES

The chronicles of military history are filled with people considered to be historically significant, many of whom are household names: John Paul Jones, “Davy” Crocket, Benedict Arnold, Sam Houston, “Stonewall” Jackson, Dwight Eisenhower, and Douglas MacArthur, to mention a few familiar names. There are thousands of other individuals associated with the military who may not be as recognizable to the general public, but who have made significant contributions to U.S. history and the U.S. military. In addition to those who gained recognition on the battlefield, these individuals include men and women who influenced military training, development of military equipment, military life, military education, military demographics, and the built environment in some locations.

An Internet search for celebrated military individuals and their accomplishments yields thousands of Web sites and printed pages, yet there are few historic properties related to the military in the NRHP that are listed as eligible under Criterion B (being associated with historically significant individuals). Most of the properties under Criterion B are also listed under Criterion A (association with historically significant events or broad patterns in history) and/or Criterion C (embodying a particular design).

The goal of this project is to provide military cultural resource managers with guidance to recognize historically significant individuals who have made contributions to U.S. military history, and properties that may be associated with those individuals. This report provides DoD cultural resource managers with the tools to properly document those historic properties. Specifically, this project:

- examines past usage of Criterion B to list properties in the NRHP,
- provides guidance for the threshold application of Criterion B,
- provides guidance for writing a history under Criterion B,
- offers direction regarding when and how to use Criterion B when conducting cultural resource inventories,

- includes a list of types of resources that can be evaluated and reference materials to use during the evaluation, and
- suggests possible management and mitigation alternatives for properties that are eligible under Criterion B.

1.3 METHODOLOGY

This project involved research using the National Park Service (NPS), NRHP Web site (<http://nrhp.focus.nps.gov/natreghome.do?searchtype=natreghome>) to download and query data from the NRHP. The data, which was downloaded on September 1, 2010, was analyzed to develop statistics for the use of Criterion B to list properties in the NRHP.¹ *NRHP Bulletin 15: How to Apply the NRHP Criteria for Evaluation* and *NRHP Bulletin 32: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons* were also consulted to develop the guidelines for recognizing a military historic property under Criterion B and documenting its history. Research for the development of a history for Major General Smedley Butler was conducted at the National Archives and Records Administration (NARA), the NARA Military Reference Branch, the U.S. Marine Corps Museum, the Alfred M. Gray Marine Corps Research Center at MCB Quantico, the Marine Corps History Center, and at the MCB Quantico Cultural Resource Office.

After conducting the research, the two sections of the report were written. The first section addresses the general use of Criterion B and provides guidelines to assist military cultural resource managers in the identification, documentation, and management of historic properties eligible under Criterion B. The second section provides a case study for a history under Criterion B for Marine Corps Major General Smedley Butler.

This project provides assistance to the DoD in meeting its obligations under the NHPA, Executive Order 13287, “*Preserve America*,” and DoD Instruction 4715.16, by providing a tool to enhance and improve historic property inventories, providing a link between historic property stewardship and the DoD mission of military preparedness, providing interpretive value to DoD stakeholders in consideration of these stewardship issues, promoting a greater appreciation for cultural properties by increasing awareness and involvement by the military and the public, and providing alternative management and mitigation strategies.

1.4 ORGANIZATION OF THIS REPORT

This report offers a brief history of laws governing cultural resource management in the United States and then provides a summary of the criteria under which a property may be listed in the NRHP. The use of Criterion B, guidance for the application of Criterion B, and guidance for writing a history context to list a property under Criterion B provide DoD cultural resource managers with valuable direction in the use of this criterion during their evaluation of historic properties. These sections are followed by information on the identification and research of properties eligible for the NRHP under Criterion B and the management

¹Once downloaded, the data used for the analysis required extensive manipulation, and therefore, may contain a few errors. In addition, the accuracy of the data may be affected by the level of accuracy of the data that was downloaded from the National Park Service Web site.

and mitigation of adverse effects to such properties. A checklist to assist cultural resource managers during an evaluation of a property under Criterion B is found in Appendix B.



**FIGURE 1. MAJOR GENERAL
SMEDLEY BUTLER, 1934**

After providing the basic tools, this report demonstrates the use of Criterion B on a military historic property through a case study of Smedley Darlington Butler (July 30, 1881 to June 21, 1940). Butler, also known as “the Fighting Quaker” and “Old Gimlet Eye,” retired from the U.S. Marine Corps as a Major General after having been stationed at MCB Quantico on four separate occasions: once as Acting Base Commander from May to June 1918, as Chief of Staff to the Base Commander Major General John Lejeune from 1919 until July 1920, and twice as Base Commander from 1920 to 1924, and again from 1929 to 1931. At the time of his death, he was the most decorated Marine in U.S. history having served in seven hostile environments including China, Haiti, and World War I. During his time at MCB Quantico, Smedley Butler strove to bring national attention and fame to the Marine Corps and MCB Quantico by making the Marines into a football team and sporting powerhouse. In this endeavor he built an outdoor football stadium with almost no government funds, using only Marines for labor. Butler was also a significant driving force behind the development of Marine aviation

tactics to provide close ground support, and in the development of MCB Quantico as the center for Marine Corps education.

1.5 ACKNOWLEDGEMENTS

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2.0 HISTORY AND DEVELOPMENT OF FEDERAL CULTURAL RESOURCE MANAGEMENT PROGRAMS

The importance of historically significant properties in the United States and their management was established more than 100 years ago, beginning with the American Antiquities Act of 1906. The Antiquities Act grew out of an increasing interest, at the end of the nineteenth century, in the protection of natural and cultural resources on public lands. The act made it illegal to remove or excavate archaeological resources without a permit. The act is considered to be the first historic preservation policy because it allowed the president of the United States to set aside properties of historic and/or scientific interest for protection, and required federal agencies to properly care for and manage those resources.

The Antiquities Act was followed in 1935 by the Historic Sites Act. This law provided for preservation of historic sites, buildings, and objects for public use as a matter of national policy. The law assigned the Secretary of the Interior the responsibility of obtaining documentation of archaeological sites, buildings, and objects and determining if they have “exceptional value as . . . illustrating the history of the United States” (Historic Sites Act, Section 2[b]). The Secretary of the Interior was also tasked with acquiring important properties, when possible, and restoring and maintaining historical properties. The NPS Advisory Board, forerunner to the Advisory Council on Historic Preservation (ACHP), which is now an independent council not associated with the National Park Service, was created to advise the agency on the management of its properties.

Thirty-one years later, the NHPA established the basis for current federal policies and procedures regarding historically significant properties. The act, which has been subsequently amended, established the NRHP, which is administered by the National Park Service, and the Keeper of the Register who is the official responsible for deciding the eligibility of historic properties for inclusion in the NRHP. The Secretary of the Interior was given the responsibility of developing the criteria used for including properties in the NRHP. The act requires that federal agencies implement cultural resource management programs that include identification of properties eligible for the NRHP and the subsequent management and protection of those properties, in consultation with the public and interested groups. Section 106 of the act requires that federal agencies take into consideration the effects of their actions on historic properties listed in or eligible for listing in the NRHP, to mitigate the effects should they adversely impact a property in or eligible for the NRHP, and to involve the public in the process to identify historic properties and mitigation of adverse effects to historic properties. An independent federal agency, the ACHP was created to ensure that federal agencies comply with Section 106, and state historic preservation offices (SHPO) were created in each state to assist the ACHP in that endeavor.

As a result of the NHPA, the Secretary of the Interior and the National Park Service established the criteria for listing a property in the NRHP. There is little information regarding how the criteria were developed; however, it is clear from the early history of cultural resource laws that archaeological sites, historic sites, buildings, and objects were of importance to the federal government and the public. It is also clear that the criteria were written in such a way to ensure the inclusion of properties that meet a more traditional idea of historic significance through connections to historic figures, events, designs, and archaeological deposits.

2.1 NRHP OF HISTORIC PLACES ELIGIBILITY

In order to be eligible for listing in the NRHP, a property must be a building, structure, district, site, or object that is significant to U.S. history, architecture, engineering, culture, or archaeology and that is over 50 years old (hereafter referred to as “historic properties”). Properties are determined eligible for the NRHP under one or more of the four criteria listed below:

- A. Association with events that have made a significant contribution to the broad patterns of our history.
- B. Association with the lives of significant persons in our past.
- C. Embodying the 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.
- D. Having yielded or may be likely to yield, information important in history or prehistory (archaeological sites are largely listed under this criterion) (NPS 1995:11).

With some exceptions, cemeteries, graves and birthplaces of historic individuals, commemorative properties, reconstructed properties, relocated properties, properties owned by religious institutions or used for religious purposes, and properties less than 50 years old are not eligible for listing in the NRHP. However, if a property that meets one of the above descriptions and represents a broader pattern of history, embodies a distinctive characteristic, is associated with a master artisan, is the only existing property associated with a historically significant person or event, or has achieved significance on a national level within the last 50 years, it may also be eligible for the NRHP under Criteria Consideration A through G (NPS 1995:25).

NRHP-eligible properties also must retain integrity of location, design, setting, materials, workmanship, feeling, and association. Integrity is defined by the National Park Service as a property’s “ability to convey its significance.” Historic properties must characterize an important aspect or “area of significance” to U.S. history, engineering, architecture, culture, or archaeology, and may be significant on a local, regional, or national level. However, the only way to determine if a property meets the criteria and to determine at what level a property is significant, is to evaluate the property within its historic setting. A history categorizes the theme(s) under which a property’s significance should be evaluated, defines the geographical boundaries of the property, and delineates the period of significance from which to evaluate the property. Commonly used areas of significance include: architecture, archaeology, art, commerce, communication, community planning, engineering, exploration, industry, invention, landscape architecture, military, politics, and transportation. A more extensive list of areas of significance is found in *NRHP Bulletin 15: How to Apply the NRHP Criteria for Evaluation* (NPS 1995).

2.2 USE OF CRITERION B

“Properties may be eligible for the NRHP if they are associated with the lives of persons significant in our past” (NPS 1995:14).

The U.S. military prioritizes the inventory and evaluation of cultural resources on the facilities they manage, but often do not have the resources to actually list the properties determined eligible for the NRHP. Because the agency’s responsibility to protect a historic property remains the same whether it is

listed or just determined eligible for listing, there is no advantage to expending resources to write NRHP nominations for eligible properties.² This practice, however, has likely biased the number of historic properties listed in the NRHP with the “military” as an area of significance to appear much lower than the actual number of historic properties owned and managed by the DoD that are associated with the military. Many of the historic properties listed in the NRHP as being associated with the military are not managed or controlled by the DoD, but rather by other federal agencies such as the National Park Service or private entities.

An examination of the overall use of Criterion B in comparison to the other criteria shows that Criterion A (“events”) and Criterion C (“design” or “architecture”) are used more frequently than Criterion B (“people”) or Criterion D (“archaeology”). Table 1 breaks down the NRHP properties displaying the numbers and percentages of all properties listed in the NRHP and properties listed with “military” as their area of significance. Many properties are listed under multiple criteria, which explains why these totals are more than 100%. Even so, the discrepancy in the frequency of the use of Criterion B compared to Criteria A and C is pronounced.

TABLE 1. BREAKDOWN OF NRHP-LISTED PROPERTIES BY CRITERION

	Criterion A		Criterion B		Criterion C		Criterion D	
	No.	%	No.	%	No.	%	No.	%
NRHP-Listed Properties – 85,822 Total	47,378	55%	12,038 (~1,723 ¹)	14% (~2%)	69,536	81%	5,682	6.6%
Military NRHP-Listed Properties – 3,500 Total	2,971	85%	828 (128)	24% (4%)	1,886	54%	480	14.0%

¹ Figures in parentheses represent the number of properties that are listed solely under Criterion B. Figures taken from the NPS Web site database on September 1, 2010.

The most notable result of this analysis is that the majority of properties listed under Criterion B are also listed under other criteria (usually A and/or C). It should be noted that the properties listed solely under Criterion B associated with the military total 3.6% of all properties listed as associated with the military. The total percentage of properties listed solely under Criterion B in the NRHP is 2.0%. Although this suggests that properties linked with significant individuals associated with the military tend to be recognized more often than properties associated with other areas of significance, it is still a low number compared to those properties listed under Criteria A and/or C. This raises obvious questions: why are there so few properties listed under Criterion B, why are the majority of properties listed under Criterion B also listed under Criteria A and/or C, is the use of Criterion B bias a result of researchers’ bias toward research topics, or is it more a question that properties generally do not reflect the significance of an individual? It does not seem conceivable that with the number of historically significant individuals crucial to the development of the United States and its military that there should be so few properties listed under Criterion B.

The office of the Keeper of the National Register of Historic Places (the Keeper) has pointed out that the NRHP program is an architecturally driven program and that Criterion C is the most used criterion because it is relatively simple to assess the physical aspects of a building, structure, site, district, or object

² It should be noted that the DoD does nominate properties where listing would assist heritage tourism and management.

and to articulate the importance of those physical qualities. It is a much more difficult task that requires more research and comparative analysis to develop the historic context to list a historic property under Criterion B (Patrick Andrus, National Park Service, Office of the Keeper of the NRHP, pers. comm., March 2011).

The question becomes: how do the physical aspects of a structure or building represent the importance of a historically significant individual—even if the person developed his/her “significance” while using that space? It seems that in order to be eligible under Criterion B the property should be directly associated with the person’s achievements. An example might be a laboratory where a significant scientist made his/her scientific breakthrough. However, if that is the case then the property would also be eligible under Criterion A as being associated with a broad pattern of history. This dilemma may partially explain why so few historic properties are listed in the NRHP solely under Criterion B.

Table 2 contains 12 randomly chosen properties from the NRHP that are listed solely under Criterion B. Notice that 9 of the 12 randomly selected properties are homes, which may be an indicator that the majority of properties listed under Criterion B only are the homes of historically significant individuals.

TABLE 2. RANDOMLY SELECTED EXAMPLES OF PROPERTIES LISTED UNDER CRITERION B

Military Area of Significance		All Other Areas of Significance	
NRHP Reference No.	Property Name	NRHP Reference No.	Property Name
66000010	Benjamin Harrison House	07000245	Andrew McNally House
72001010	Gen. William Henry Harrison Headquarters	73000698	(Robert) Kennigott’s Grove
74000977	Gen. Otto Holland’s Springfield Farm	72001361	Samuel T. Rayburn House
76001548	Gen. Beall Reasin’s House	85001947	David Bachrach House
83000508	Lt. Gen. Claire L. Chennault’s House	94000593	Alexander W. Livingston House
02001273	Henry Knox, Thatcher House	99001261	(Jehoiada) Jeffery Cemetery

2.3 GUIDANCE ON THE THRESHOLDS FOR APPLICATION OF CRITERION B

The use of Criterion B can be difficult, which may help to explain why it is not often used. In fact, the trend within the NRHP for properties under Criterion B is biased to white males whose importance tends to focus on business and/or politics (Boland n.d.:4). The National Park Service has produced *Bulletin 32: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons* to assist researchers in the use of Criterion B. When evaluating a property under Criterion B, the area of significance (e.g., agricultural, archaeology, education, politics, military, transportation, etc.) to which the individual made contributions must be defined; the individual’s relationship to the property must be established including how the property represents that person’s accomplishments, and the integrity of the property.

The following is a summary of the 11 guidelines for evaluating properties under Criterion B found in NPS *Bulletin 32*. *Bulletin 32* also contains detailed explanations of these guidelines, including specific examples (Bolard n.d.). The guidelines below are grouped into three categories.

Significance Guidelines (NPS Bulletin 32):

1. Establish the specific individual's contribution to U.S. history (including the pre-European contact era) by defining how that person's actions contributed to history. It will likely be more difficult to document the significance of an individual on a local scale than on a regional or national level. The person must be clearly associated with the broader pattern of local history. An example would be the building containing the office of a military commander who established a revolutionary training technique while serving as an installation commander at a particular installation. Depending on its integrity, the building where the technique was developed or the training area where the technique was applied may be eligible under Criterion B.
2. When a property can be tied to more than one individual or to a group, establish the historical significance of one individual of the group and how the property represents that individual's area of significance. If there is no one individual that is historically significant, but there is a larger group for which an argument can be made regarding significance, then the property should be evaluated under Criterion A.
3. Establish how the person's significance is above and beyond others who were active, successful, and influential in the same field. It must be proven that the individual played a prominent role in the local, regional, or national history and was more than just wealthy or successful. The property must be related to the significance of one individual to be eligible for listing under Criterion B.
4. If a property is less than 50 years old or the individual's contribution to U.S. history occurred less than 50 years ago, then the property must meet Criteria Consideration G for exceptional significance to be listed.
5. A property should be evaluated under Criterion C if it is a significant example of a person's skill as an architect or engineer. However, if a property is associated with the individual, but it does not necessarily represent their skill, it may be evaluated under Criterion B.

Association Guidelines (NPS Bulletin 32):

6. A property must be directly associated with the significant individual. Commemorative properties are usually not eligible for the NRHP under Criterion B.
7. A property is usually connected to the significant individual's area of significance. This is why gravesites and birthplaces are usually not eligible for the NRHP. The birth or death of someone is not usually connected to their area of significance. It is unlikely that every building visited or used by a historically significant military personality represents that person's area of importance. However, those properties central to that person's significance actions or influence may be eligible.
8. The property should represent the individual's accomplishments or contributions to the area of significance. The favorite gazebo or park bench of a historically significant individual is not likely to represent that person's accomplishments unless that location is linked directly to the individual as a location central to their accomplishments.

9. Compare all of the properties associated with the individual's significance to establish which ones are the best representatives of his/her influence.

Methods and Integrity Guidelines (NPS Bulletin 32):

10. Research for the history documenting the individual's significance and connection to the property must be accomplished using standard techniques for historical research and analysis (e.g., use of primary documents and proper citation methods).
11. The property must possess interior and exterior integrity from its period of significance so that the significant individual would recognize the property.

The first five guidelines dictate that the significance of the person must be established in order to list a property under Criterion B. This requires a well-researched and written history outlining the importance of the individual and the accomplishments that demonstrate their impact on U.S. history. This is more difficult for individuals of local importance than for those of national significance. Guidelines 6 through 9 require that the property represent the individual's area of significance. Therefore, the boyhood home of a famous astronaut is not likely eligible under Criterion B unless the home included an observatory where the person spent his/her time developing a love for space.

Guideline 11 establishes the integrity threshold for a property to be listed under Criterion B. Both the interior and exterior of the property must maintain its integrity from its period of significance so that the figure it is associated with would recognize the property. Often, it is extremely difficult to establish what the property looked like, especially the interior spaces that were less often photographed historically. Obviously, the aspect of location is relatively easy to assess, and the aspect of association with the significant individual should be well established to even consider the property under Criterion B. The aspects of design and materials can be inferred from the existing elements' age compared to the period of significance that is assigned to the property under Criterion B. The two aspects of integrity that are more difficult to assess for properties under Criterion B are setting and feeling, particularly of the interior spaces, as they represent the period of significance for a particular individual.

An example of a pitfall, when evaluating the feeling and setting aspects of integrity for any property, would be allowing the color of a wall or temporary furnishings to cloud one's judgment regarding these aspects. If the wall fabric is original, then one must imagine the color to be something closer to the original or at least to be something from the property's period of significance. If the interior fabric is original and the design has been retained, then the space reflects its original feeling. The same applies to other temporary elements that can dramatically affect the feeling or setting of a property, but can be easily changed.

An argument can be made that the seemingly increased level of integrity called for in guideline 11 is, in some ways, counter-intuitive to Criterion B properties whose importance emanate from the individual and, in many cases, not the details of the space being used as a physical manifestation of that person's accomplishments. For example, in most circumstances the retention of original windows or doors to the period of significance of a Criterion B-eligible property does little to convey the importance of the individual's contribution to U.S. history. Resolution of these inconsistencies is beyond the scope of this project; however, explanation of the challenges that the evaluation of properties under Criterion B presents is important to understanding why Criterion B is used so rarely and usually in conjunction with Criterion A or C.

The Keeper strongly cautions against nominating properties associated with living persons because their careers may be in progress and when evaluating a property under Criterion B, the Keeper wants to evaluate the property against the entirety of the individual's career. The property that is most associated with and representative of a person's career is the property that is mostly likely eligible for listing. It is important to remember that not every building associated with a historically important person (for example locations where someone slept or ate) is eligible based on that association. The Keeper also recommends that researchers avoid the trap of nominating a property based entirely on the economic status of an individual. Historic properties nominated under Criterion B must be associated with individuals who made an impact to a community, region, or the nation (Patrick Andrus, National Park Service, Office of the Keeper of the NRHP, pers. comm., March 2011).

2.4 GUIDANCE ON WRITING A HISTORY FOR CRITERION B

In order to evaluate the historic significance of a property, the historic significance of the property must be established. The historic background is the pattern or trend of history that gives the property its meaning and importance and should focus on the theme, geographic limits, and period of time from which the property is being evaluated. A history places the property in a local, regional, or national pattern of history and provides a tool for comparing the history of the property to the history of the surrounding area. The theme of a history should establish the area(s) of significance that the property represents and should describe how the property demonstrates that area(s) of significance. A list of often-used areas of significance include archaeology, agriculture, architecture, art, business, communications, community planning and development, conservation, economics, education, engineering, entertainment, ethnic heritage, exploration, health, industry, invention, landscape architecture, law, literature, maritime history, military, performing arts, philosophy, politics, religion, science, social history, and transportation.

The history also establishes the property's particular historic association with an event, person, architectural or engineering value, or potential to contain information. The physical features of a historic property that represent the area of significance must be documented as well (NPS 1995:44). In fact, the 11 guidelines listed above are the foundation of a history under Criterion B, and each should be thoroughly addressed.

The history is the key to judging a property's significance. A historic property may be eligible for the NRHP under one or all criteria, it may have a broad range of dates or a specific date for its period of significance, and its level of significance can vary depending on which criterion and which period of significance is being defined. For example, a historic district within a military installation cantonment area that later became the model for a standardized military building plan may be eligible for the NRHP on a national level under Criteria A and C. If a prominent commander was associated with that same cantonment area for a short period of time, but left an undeniably notable "stamp" on a portion of the facilities that comprise the historic district, those facilities would also be eligible under Criterion B and may have a different period and/or level of significance, depending on the historic importance of that particular commander.

NPS *Bulletin 32* states that the historic significance for nationally or regionally historically significant individuals is much easier to establish than that of locally significant individuals (Bolard n.d.:5). The contributions and significance of famous (and infamous) people whose names are easily recognized is usually not contested because they are familiar. However, the history of people of local significance is much more difficult to develop simply because the local history must be detailed more thoroughly as well as the individual's contribution to the local historical trend and how that individual's contribution exceeds

that of his/her local contemporaries (Bolard n.d.:5). In addition, the history must also explain how the property represents the individual and the specific period and area of significance.

As the NRHP statistics in table 1 demonstrate, there are fewer properties listed under Criterion B than under A or C, and oftentimes when a property is listed under Criterion B it is also listed under Criteria A and/or C. This may be due to the extraneous documentation standards required establish the significance of locally important individuals and to the seemingly higher standard of integrity outlined in *Bulletin 32* to which properties nominated under Criterion B are held (e.g., having to retain integrity of interior spaces and exterior façades to the degree they would be recognizable to the individual). Achieving both of these elevated standards can be arduous. It is oftentimes easier to articulate NRHP eligibility for a property under Criterion A or C, especially if the property has a well-maintained exterior, but has altered interior spaces or covered or removed elements of workmanship that would make it ineligible under Criterion B. However, in such a case, the history should still contain as much information as possible regarding the significant individual and his/her connection to the property. The historic property will be afforded the same “protections” under the NHPA, regardless of the criteria under which it is listed or determined eligible for listing.

Mr. Andrus of the Keeper’s office mentioned that the Garst, Roswell, and Elizabeth Farmstead Historic District, listed in the NRHP in 2009, is a recent notable example of the use of Criteria B (and A). From his Iowa farm, Roswell Garst was instrumental in the development and marketing of hybrid corn, which was a development that transformed American agriculture. Mr. Garst was also an important figure during the Soviet-U.S. détente when Garst, a self-styled citizen diplomat, regularly corresponded with Nikita Khrushchev regarding the development of advances in agricultural methods and even hosted the Soviet leader at his farm in 1959 (Nash and Conard 2009).

It should be noted, however, that the NRHP registration form for this property devoted more space to the documentation of the physical aspects of the property and its development over time than was devoted to the justification of the property as eligible under Criterion A for its “association with significant developments and trends in agricultural history,” and Criterion B for its “association with Roswell Garst, an important innovator and expansive promoter of the new agricultural methods and science.” Clearly, the Garst farmstead and Roswell Garst are associated with a broad pattern of agricultural history through Garst’s role in the development of hybrid corn and with Cold War détente politics via his communication with Nikita Khrushchev and the resultant unprecedented visit to a Midwestern farm by a Soviet leader. However, the fact that over 50% of the information in the registration form is devoted to the physical description of a property that is not architecturally significant illustrates Mr. Andrus’s point that the NRHP is an architecturally biased program.

Casa Paoli was listed in the NRHP in 2009 under Criterion B only. As the birthplace of, and last remaining structure associated with, Antonio Emilio Paoli y Marcano, a world renowned early twentieth century Puerto Rican tenor opera singer. The registration form describes how his family came to own the property and that it was located in an area that afforded his childhood exposure to the fine arts and music in Ponce, Puerto Rico. The form explains that this property is the sole remaining building associated with the famous singer and explains that is the location of the house that was a prominent factor in Paoli’s career choice (Santos 2009).

The Mary E. Surratt Boarding House was also listed in the NRHP in 2009 under Criterion A as a location for the meetings of the conspirators involved with the assassination of Abraham Lincoln, and under Criterion B for its association with Mary E. Surratt, the first woman executed by the federal government (for her role in the Lincoln assassination) (Pousson 2009). The form does an excellent job of connecting the property to Mary Surratt and to the assassination; however, it argues that the building, which is now a Chinese restaurant, “evokes a sense of past and encourages reflections of the experiences of Mary

Surratt.” The photographic documentation reveals a small building with a restaurant storefront and a Chinese restaurant dining room dwarfed by large contemporary buildings, which do not support the argument for integrity of feeling and setting. However, if the property’s importance lies with its association to the Lincoln assassination and Mary Surratt, then one could argue that integrity of feeling and setting may not weigh as heavily for this property as it would for another type of property.

A perusal of several other Criterion B-listed properties reveals that the older the registration form, the less clear the connections are between the property and the individual’s accomplishments that make him/her historically significant. The older forms more often contain a detailed description of the physical aspects of the property and a comprehensive account of the person’s achievements, but often lack an explanation of how the property exemplifies those accomplishments.

2.5 GUIDANCE FOR IDENTIFYING POTENTIAL MILITARY PROPERTIES ELIGIBLE UNDER CRITERION B

Important U.S. military heroes are sometimes honored by having military installations (Army and Air Force in particular) named in their honor. Most often, however, the hero for which an installation is named is separated geographically and/or temporally from the installation named in his/her honor. Table 3 contains a sample of military installations that are named after individuals in a commemorative manner, but were not directly influenced by that individual. Take note that MCB Camp Butler was named after Smedley Butler, who was never associated with Japan or the base. Commemorative properties that are not directly associated with the individual they commemorate are not eligible for the NRHP under Criterion B. However, those whose names are used in a commemorative manner tend to be historically significant individuals and research should be conducted to determine if there are properties that may be associated with them that should be evaluated under Criterion B.

Since installations named after individuals are not a reliable method of identifying properties that may be eligible under Criterion B, the question remains: how does one know when or how to identify properties, specifically military properties, that would be eligible for the NRHP under Criterion B? The military is scrupulous about recording its history. Every unit is required to record its activities and those records are collected and managed by military historians. This meticulous recordation has resulted in a mountain of military histories including biographies, autobiographies, installation histories, unit histories, branch histories, engagement histories, etc. Federal and state agency records, historic maps, historic aerials, oral histories, field survey methods, and other resources can also be used to identify historic properties and develop a history within which to place historic properties.

Examining the information obtained from these varied resources may result in the identification of prominent individuals associated with the resources found on a military installation. After identifying significant individuals and their accomplishments, the properties associated with the individual’s period of significance should be inventoried and researched. For example, if a particular commander made an impact resulting in the escalated use of an installation, or took a hands-on approach to the design of a particular section of the cantonment area or training facilities, then the facilities associated with that commander should be evaluated under Criterion B (as well as A and C).

Another method to detect resources that may be eligible under Criterion B would be to identify structures, buildings, or areas bearing an individual’s name. Sometimes buildings, like installations, are given commemorative names and are not connected to the individual whose name they bear. However, sometimes the name is given due to the individual’s association with the building or with the installation.

TABLE 3. MILITARY INSTALLATIONS WITH COMMEMORATIVE NAMES

Installation Name	Military Hero	Branch
Fort Irwin, est. 1940	Major General George LeRoy Irwin, World War I hero	Army
Fort Benning, est. 1918	Brigadier General Henry L. Benning, Confederate hero	Army
Fort Riley, est. 1853	Major General Bennett C. Riley, military along Santa Fe Trail, 1829	Army
Camp Shelby, est. 1917	Issac Shelby, Revolutionary War hero and first governor of Kentucky	Army National Guard
Camp Pendleton, est. 1942	Major General Joseph H. Pendleton, major advocate for West Coast training area	Marine Corps
Eielson Air Force Base, est. 1944	Carl Ben Eielson, Arctic aviation pioneer	Air Force
Camp Butler, est. 1955 (in Okinawa, Japan)	Major General Smedley Butler, died in 1940 as most decorated U.S. Marine	Marine Corps
Goodfellow Air Force Base, est. 1940	Lt. John J. Goodfellow Jr., World War I hero	Air Force
Camp Lejeune, est. 1941	Commanding General John A. Lejeune, World War I hero and famous Marine Corps Commandant	Marine Corps
Grissom Air Reserve Base, est. 1942 (name changed from Bunker Hill in 1968)	Lt. Col Virgil Grissom, Apollo astronaut	Air Force Reserve

In addition, the people after whom buildings or installations are named may have left an impact on the installation or the branch of service that requires additional research. The property being considered and the individual's period of significance should both be at least 50 years of age, unless the property meets the guidelines under criterion consideration G for exceptional significance within the last 50 years.

In order to identify an individual and resources associated with that individual, an installation's real property inventory can be consulted to identify if and when the installation experienced a pronounced period of construction, use, or development. Then the members of the command group that may have been present and instrumental in those activities can be identified. This method may yield individuals associated with an installation's period of growth; however, the individual must have been historically significant, meaning they were responsible for an important aspect of that installation's growth or use or are somehow connected to a property that demonstrates his/her historic significance.

Some installations may have objects that are associated with a historically significant individual that should be evaluated under Criterion B. For example, an evaluation of the cultural resources at Camp Atterbury Joint Maneuver Training Center identified an early twentieth century Pennsylvania Railroad executive passenger car with documentation indicating that it belonged to General William Atterbury. William Atterbury, an executive with the Pennsylvania Railroad, was asked to join the war effort during World War I, and received a direct commission as brigadier general. He was sent to Europe to organize the rail system to facilitate transportation for the war effort. After World War I, the Indiana-born Atterbury returned to the Pennsylvania Railroad and became president of the company in 1925 (BB&E 2005). His work during World War I is considered instrumental to the war effort. It was recommended that the railcar was eligible for listing in the NRHP as a structure under Criterion B, if it was proven that the car was indeed his presidential car. This is an example of an installation that was named after a

historically significant individual who was never associated with the installation, but where the installation possessed something that was associated with that individual, which required evaluation under Criterion B.³ The transient nature of military personnel, however, often makes it difficult to connect a property to an individual's significant contributions.

2.6 SURVEY AND RESEARCH ON PROPERTIES ELIGIBLE UNDER CRITERION B

Initially, researching historic properties managed by the military that are associated with historically significant individuals may seem like a daunting task. However, it is similar to the existing processes used by military cultural resource managers to identify historic properties eligible under any of the other criteria.

First, identify what type of resource is being inventoried (e.g., archaeological sites, buildings, structures, objects, sites, or districts). Prior to initiating any fieldwork, it is best to establish a general history for the resources being inventoried. For example, before conducting an inventory and evaluation of all structures on a military installation, one should discern when the installation was established and obtain a real property inventory that includes the names and dates of construction of the facilities. All the information compiled for previous cultural resource investigations should be reviewed, including information from additional historic records that may be found in installation histories and museums, local libraries, newspaper archives, and local historical societies.

General installation history, units associated with the installation, and the role the installation played in training operations should be available from the installation historian (if one exists), or the installation's archived records. If available, installation historians are great resources as they can usually provide a tremendous amount of information regarding an installation's history, names of people associated with significant events or periods of the installation's history, in addition to photographs and other primary resources. Having this general installation history in hand when conducting fieldwork should help to focus the questions being addressed during the inventory and evaluation to include determinations if the properties in the inventory are associated with historically significant individuals.

If the initial research and fieldwork identify a property that should be evaluated under Criterion B, additional research may be required to develop a history for the resources and the individual. Appendix B is a checklist that may be used when evaluating a property under Criterion B. The following list contains possible information resources:

- Web site for DoD installations: <http://www.militaryinstallations.dod.mil>
- National Park Service Web mapping:
<http://www.nps.gov/history/nagpra/documents/basesmilitarymap.htm>
- unit histories for all Air Force units are on file at the Air Force Historical Research Agency, Maxwell Air Force Base (AFB), Alabama
- UAMC Research Library at MCB Quantico: <http://www.mcu.usmc.mil/grc/lomc/default.aspx>
- installation libraries, historians, cultural resource managers
- state historic preservation office records for inventories, evaluations, historic contexts

³ Keys to the rail car doors were later discovered and it was proven that the rail car layout did not match that of Atterbury's presidential rail car, resulting in a determination of "not eligible" for the NRHP.

- Army On-line Library: <http://www.libraries.army.mil/>
- National Archives and Records Administration: <http://www.archives.gov/research/military/>
- NARA regional offices: <http://www.archives.gov/locations/finding-aids/>
- U.S. Army Corps of Engineers Library: <http://www.usace.army.mil/Library/LibraryProgram>

The following is a list of 10 installations that may have properties eligible for the NRHP under Criterion B. Additional research is required for each suggestion. This is not a comprehensive list of installations that may have properties eligible for the NRHP under Criterion B. Each installation cultural resources manager should conduct the appropriate research to determine if there are historically significant individuals linked with a post and then determine if there are extant properties that are associated with the individual(s).

- Fort Leavenworth, Kansas
Sherman T. William, Colonel Alexander McCook, Arthur L. Wagner, Eben Swift, and Major John F. Morrison were instrumental in different ways to the early development of schools at Fort Leavenworth in Kansas. Additional research is required to establish if there are any extant properties on the installation associated with any of these individuals and to determine the historical significance of these individuals.
- 29 Palms, California
In the 1970s, Brigadier General Ernest R. Reid Jr. played a key role in getting an expeditionary force stationed at 29 Palms and to expanding the infrastructure at the installation. Properties associated with Reid would not be 50 years old at this time; however, his role and level of significance to the development of 29 Palms can be determined. If he or properties associated with him do not meet Criterion Consideration G, they will need to be re-evaluated when they reach 50 years of age.
- Fort Lewis, Washington
Brigadier General David L. Stone played a role in the initial construction of Fort Lewis in 1917, and he became post commander in 1936 when he was involved in the construction of the airfield. Inquiries to Gray and Pape, Inc., a private contractor that has conducted cultural resource studies at Fort Lewis, did not yield information regarding properties on the installation connected to Stone; however, additional research is recommended to determine Stone's historical significance and connection to any extant properties on the post.
- Eglin Air Force Base, Florida
James E. Plew was a local businessman who realized the economic potential of bringing a military installation to the Valparaiso, Florida, area. He leased land to the City of Valparaiso for an airport and the adjacent land to the government for use as a bombing and gunnery range, which became the Valparaiso Bombing and Gunnery Base in 1935 with Captain Arnold H. Rich as commander. The base was renamed in 1937. Additional research should be conducted on the historical significance of Plew and Rich and to determine if there are any extant properties associated with these individuals.
- Wright-Paterson Air Force Base, Ohio
Brigadier General Joseph T. Morris was post commander of Wright-Paterson AFB from 1945 to 1952, which is an unusually long time. The installation played a role in aeronautical research and

development. Additional research should be conducted to determine Morris's significance and to determine if there are any extant properties associated with him.

- Camp Shelby, Mississippi

Dr. W.W. Crawford was instrumental in convincing the federal government to establish Camp Shelby in its current location. Additional research is required to determine if Crawford was a historically significant individual and if there are any extant structures associated with him.

- Fort Bragg, North Carolina

General Albert J. Bowley was Commanding General of Camp Bragg in 1922, and kept it from being closed. Bowley was also commander a year later when it was made a permanent army installation. Additional research is required to determine Bowley's significance and if there are any extant properties associated with him.

- Fort Sill, Oklahoma

Fort Sill has a very long and well-documented history with several notable names associated with its history. Additional research is required to determine if any of those individuals who were present or associated with the post played a significant role in the installation's history, and if so, if there are any extant properties associated with these individuals.

- Langley Air Force Base

Brigadier General Billy Mitchell flew the first test bombing runs over captured German submarines from Langley. Additional research is required to establish Mitchell's historic significance to the development of air warfare and use of bombing tactics on submarines. Research regarding his potential association with extant properties on the installation should also be conducted.

- Fort Meade

Brigadier General Samuel Rockenbach was instrumental in the development of tank warfare at Fort Meade, home to the first Army Tank School. Additional research is required to establish Rockenbach's historic significance and connection to extant structures eligible for the NRHP.

Inquiries to the Keeper, the ACHP, several different SHPOs, military cultural resource managers, and contracting firms who have experience conducting cultural resource inventories and evaluations on military installations revealed that Criterion B is rarely considered as a listing criterion. It should be noted that the inquiries were conducted informally and were not comprehensive. A few historic properties eligible under Criterion B were identified.

The Adjutant General's Residence at Camp Murray in Tacoma, Washington, was determined eligible for listing in the NRHP under Criterion B for its association with Major General Maurice Thompson. Thompson was responsible for the modernization of the Washington National Guard. The building was constructed in 1921 (an addition was added in the mid-1980s).

The Williamson Armory (also known as the Gaujot Armory) in Williamson, West Virginia, has been determined eligible for the NRHP for its association with the Gaujot brothers, Antoine and Julien, who each received a Medal of Honor. The armory will not be formally listed in the NRHP (Jonathan Young, West Virginia Army National Guard, pers. comm., April 2011). Pershing House at Fort Sam Houston in Texas was listed in the NRHP under Criterion B in 1974. There is little information available for Pershing House or its history, and the Fort Sam Houston cultural resource manager could not be reached for

information regarding the history and management of the property. The Milpitas Ranch house at Fort Liggett Hunter in California was listed in the NRHP under Criterion B for its association with William Hearst. It is now managed by the Army; however, it is not associated with the military.

Other historic properties listed under Criterion B that are associated with the military that were investigated during this project include the Martin Van Buren National Historic Site that was listed for its association with the eighth president of the United States and its architecture. The William Henry Harrison House was listed for its association with President William Henry Harrison as his home after he left office. Washington's headquarters in Pennsylvania was listed in the NRHP in 1973 for its association with George Washington. The NRHP registration forms for all three properties aforementioned do not clearly link the property to the individuals' areas of significance and the only connection between the properties and the individuals is that they occupied the structures at some point in their lives. Only Washington's headquarters was occupied during the time when the significant individual period was active in his area of importance.

2.7 SUMMARY

The use of Criterion B to list properties in the NRHP has been historically problematic for many reasons; when it is used, it is most often done in combination with Criterion A or C. This is logical because if a historic property is truly representative of the person's achievements, then that property should also reflect the broader pattern of history within the area of significance that the individual is associated with. In addition, if a historic property associated with a historically notable individual retains a high degree of physical integrity, then it may also be representative of an architectural or artistic style. In fact, it seems in the past the physical integrity of historic properties listed under Criterion B have been emphasized for preservation, interpretation, and mitigation more than the properties' associations with historically significant individuals, which is a constraint of the admittedly architecturally biased NRHP program.

Criterion B has not been used often to list military properties in the NRHP, which may be in part due to the transient nature of military personnel who tend to spend only a few months or years in any location. However, DoD cultural resource managers should be aware that there may be properties on their installations that should be evaluated for eligibility under Criterion B. The guidance and examples in this chapter can assist with the identification and evaluation of military historic properties associated with historically significant individuals.

3.0 MANAGEMENT AND MITIGATION RECOMMENDATIONS

If the architectural bias of the NRHP program has caused the threshold for integrity under Criterion B to be higher than that for Criteria A or C, as was suggested earlier, then the threshold for an adverse effect on that same historic property would likely be lower. This would mean that a project found to have no adverse effect on a historic property listed under Criterion C (for example the removal of an interior wall in a nonpublic space) may be found to have an adverse effect on the same property if that property is listed under Criterion B. This may be another reason for the apparent skewing of the properties listed in the NRHP away from Criterion B.

An inquiry was sent to Katherine Kerr, Program Analyst, at the ACHP, asking for comment regarding her experience with mitigation of adverse effects to historic properties listed in the NRHP under Criterion B, specifically of properties whose area of significance were military. Kerr replied that generally the ACHP is not involved with the decisions of criterion used to determine a property's eligibility for the NRHP. She also indicated that generally mitigation measures are negotiated between the federal agency and the SHPO, but architectural drawings and photographs can be methods used for mitigation (Kerr, e-mail communication, March 2011).

There is no programmatic agreement or historic preservation plan for the Adjutant General's residence mentioned in the preceding section. It is currently being managed on an individual project basis and the SHPO is consulted each time a maintenance action is proposed. An extension was added to the building approximately 20 years ago and compliance with Section 106 of the NRHP was completed; however, documentation of the mitigation undertaken for the extension (if any was conducted) is no longer accessible (Lt. Col. Mike Moran, Camp Murray Base Engineer, pers. comm., March 2011).

The Milpitas Ranch House at Fort Liggett Hunter in California is currently managed under a SHPO-approved maintenance manual that is implemented by a basewide programmatic agreement. The treatment outlined in the manual and the programmatic agreement is solely focused on the physical aspects of the structure and the use of the Secretary of the Interior's guidelines when conducting minor maintenance and treatment on the building. There is no information in the plan regarding maintenance or interpretative actions that should be taken to address the maintenance of the building's historical importance as a property associated with William Hearst. The Fort Liggett Hunter cultural resource manager has placed a plaque and pictures within the building explaining its association with Hearst and stated that occasionally tours of the building are given where the history of the building and its original owner are emphasized (Lisa Cipolla, Cultural Resource Manager at Fort Liggett Hunter, pers. comm., March 2011).

Research on the management of Criterion B-listed properties that are not controlled by a DoD entity revealed that the ones controlled by the National Park Service, like the Fort Necessity National Battlefield, or by private entities like the Benjamin Harrison Home, are often managed for preservation and interpretation purposes. Compliance with the NHPA is not usually required for the privately owned properties (although compliance with local or state laws may be required) unless they would be affected by a federal undertaking, such as a project funded by a federal preservation grant. Therefore, consultation with a SHPO and mitigation of adverse effects is not usually required for additions, changes, or maintenance and repair of privately owned historic properties as it is for the same actions taken for federally managed historic properties.

Historic properties listed solely under Criterion B are different than those listed under Criterion A or C because their importance is connected to their association with people, and it is that association that should be articulated in the history; particularly, what makes that person significant and what aspects of

the historic property physically represent that significance. Criterion B-listed and eligible properties should be managed differently, and adverse effects to those properties should be mitigated differently. In many cases, it is rare that a property is eligible under Criterion B, unlike properties that are listed for their demonstration of a broad pattern of history or a particular design; it is more likely to be a one-of-a-kind facility due to its representation of a person's historical significance.

Management of Criterion B-eligible properties starts with identification of those specific elements of the property that represent the property's significance under Criterion B. This is a critical component of establishing the integrity of the property, and should have been completed when making a determination of eligibility. Effective management of the property includes a professional assessment of any required maintenance. Repair of the historic fabric and structural elements that are central to the properties' association with the historically important person should be completed in accordance with Section 106 of the NHPA, and in consultation with the appropriate SHPO and consulting parties, and should include collaboration with engineers and historic architects and utilization of the NPS Technical Preservation Briefs (<http://www.nps.gov/hps/tps/briefs/presbhom.htm>).

To avoid repeated and continuous NHPA Section 106 consultations for the same facility, a cultural resource manager can exercise a more traditional approach and develop a programmatic agreement under Section 106 to perform routine maintenance on the facility. A programmatic agreement generally specifies actions that can be taken on properties without further consultation under Section 106, and are actions that result in no adverse effect to the property. Programmatic agreements generally take approximately 12 months or more to complete.

Another option to avoid continuous Section 106 consultation is to have a historic building assessment performed and a maintenance and treatment plan developed. This option would include having a detailed list of the facility's contributing elements, a condition assessment of those elements, and recommended maintenance and/or repair methodologies that would result in no adverse effects to the property. This type of document can serve two critical functions. It can provide valuable information to the department of public works and facilities management office regarding the status of the major systems within a facility. This information can be used to request or reallocate maintenance funds to repair major elements. It also provides guidance to ensure those repairs have a minimal impact on the resource provided the recommended repair methods outlined in the document are followed. Secondly, the SHPO may be able to review the document under Section 106. If the SHPO concurs that the proposed actions in the plan will have no adverse effect on the property, and as long as the plan is followed, no additional Section 106 consultation is required. The advantage of the maintenance and treatment plan approach is that it eliminates the long process of developing a programmatic agreement and provides useful information and guidelines to facilities personnel.

The foregoing actions would result in the maintenance and repair of the physical aspects of the historic property, but what about the preservation of the property's association with the person? Preservation of a Criterion B-eligible property's association with the significant individual is just as important as the preservation of the physical components of the property. However, this is a more difficult aspect of preservation and maintenance of historic properties for agencies like the DoD, whose mission (unlike that of the National Park Service) is not preservation.

Management of a Criterion B-only property poses arduous challenges for the DoD because the threshold for integrity under Criterion B is relatively high and the property should retain its appearance from its period of significance associated with the individual (who should be able to readily recognize the property). Maintenance of this level of integrity can potentially restrict options for use of the properties to those that would not require major modifications of interior or exterior spaces. Preservation management of Criterion B properties could require the retention of minor fabric and material, potentially even

furniture, from a property's period of significance. However, temporary, unobtrusive changes may be possible with no adverse effect to the property if the changes can be easily corrected and the property restored to its original state.

Maintenance and preservation of the physical aspects of the property that is eligible only under Criterion B could also include additional documentation and preservation efforts like:

- Providing information about the property's significance on a publically accessible Web site.
- Providing tours of the property.
- Hanging historic photographs within the building, along with information regarding the individual with whom the building is associated.
- Brochures and other printed materials for general distribution.
- Development of an application for smart phones and other mobile devices.

In the event an adverse effect to a Criterion B-eligible historic property is unavoidable, then mitigation of the effect would be required. The extent of mitigation required on a Criterion B property depends on the extent of the proposed impact. The Keeper's and the ACHP's advice regarding potential mitigation measures for properties eligible under Criterion B include the common techniques used for the mitigation of properties listed under Criteria A and C, which generally include documenting the property's association with the person in a historic context. The samples of historic contexts on the random NRHP registration forms reviewed as part of the project usually provided a biography of the person's life, but typically failed to document the aspects of the property that physically represent its association with the person's accomplishments.

Mitigation strategies can and should be widely divergent. Therefore, providing a list of specific mitigation actions is not ideal. It is more useful to create a list of principles or guidelines when considering mitigation of Criterion B-eligible properties. Of course, as required by Section 106 and its implementing regulation 36 *Code of Federal Regulations* (CFR) 800, all mitigation must be negotiated with the appropriate SHPO and/or the ACHP and the public, and must be documented in a memorandum of agreement. Below is a list of principles to guide the development of mitigation for adverse effects on Criterion B-eligible properties:

- Principle 1: The property's significance is its association with a historically significant individual and it is this component of the property that it is imperative to document. If the windows or the wallpaper were not significant to the person's achievement, then they may not be considered significant to the integrity of the property.
- Principle 2: The individual's contribution to U.S. history must be portrayed.
- Principle 3: The individual's connection to the property and how that property exemplifies that person's historic contributions should be the focus of mitigation. An example might be the workshop of a person whose achievement was the design and construction of a new piece of military equipment. In this case, the layout of the work space may be significant if it in some way limited or directed the design of the new equipment.
- Principle 4: The purpose of mitigation is to preserve a historic property through documentation before it is adversely affected. The only requirement the federal government has for mitigation is that the agency must consult with the appropriate SHPO and/or the ACHP (the tribal historic preservation officer [THPO], if appropriate), the public, and interested parties. The type, extent, and use of mitigation should be decided through the consultation process, which leaves ample room for creativity.

- Principle 5: Mitigation should be fiscally responsible and should be relevant (apply to the issue at hand) to the U.S. public as well as to future generations of researchers. If it is not relevant and fiscally responsible, the intent of mitigation has not been met. Architectural drawings and photographic documentation may fail to capture the essence of the property's association with an important person. If that is true, then these mitigation measures are not relevant or fiscally responsible.

Using these principles will avoid the pitfall of restricting the mitigation of the property to the design elements while losing the importance of the property's connection to a significant person. The purpose of mitigation is to document and preserve the significance of the property for the U.S. public. Mitigation of a Criterion B-eligible property naturally lends itself to creativity due to the ease with which the U.S. public identifies with historic figures. Interactive displays, museum exhibits, and computer technologies are innovative ways to document a historic property and its associated person in ways that provide for proactive engagement with the community.

3.1 CONCLUSIONS

There is a distinct bias for listing properties in the NRHP under Criteria A and C with less than 14% of the total number of properties in the NRHP being listed under Criterion B. When examined even closer, it is revealed that the majority of properties listed under Criterion B are also listed under Criteria A and/or C, leaving just 3.6% of all properties in the NRHP listed solely under Criterion B. The National Park Service has developed a list of 11 guidelines for evaluating a property under Criterion B, which should be followed (Bolard n.d). In addition, in order to identify properties that need to be evaluated under Criterion B, a cultural resource manager should begin by reviewing and synthesizing information from a variety of sources including post histories, historians, libraries and museums; unit histories; real property records; oral histories; historic aerials and maps; and local, state, and federal historic and cultural resource records. Information revealed by these sources may identify locally or regionally significant individuals who could be linked to properties that are being or should be evaluated for NRHP eligibility under Criterion B.

Management of historic properties listed under Criterion B may prove to be more arduous than those listed under Criteria A and/or C. However, there are a couple of administrative options open to cultural resource managers including a traditional programmatic agreement approach and a less traditional maintenance and treatment plan approach. This second approach will only work if the SHPO is willing to review and approve implementation of a plan that would result in "no adverse effects" to the property. Regardless of the methods used to maintain the physical aspects of the property, the preservation of the property's association with a historically significant individual is also essential.

And finally, if an adverse effect to a historic property listed under Criterion B is unavoidable, then there are five principals to keep in mind when developing mitigation strategies for such properties. These principles are: (1) documentation of the component of the property that is associated with the historically significant person, (2) documentation of the person's contribution to history, (3) documentation of how the property demonstrates the person's contributions to history, (4) mitigation should be creative and conducted in consultation with Section 106 consulting parties, and (5) mitigation should be fiscally responsible and should be relevant to the U.S. public as well as future researchers. These principles will help to avoid restricting mitigation solely to the design elements of the property and will help to keep the person the property is associated with at the forefront of the documentation.

4.0 PILOT STUDY: MARINE CORPS BASE QUANTICO AND SMEDLEY BUTLER

4.1 METHODOLOGY

Major General Smedley Darlington Butler was chosen as a case study for the application of Criterion B to historic properties eligible for the NRHP for several reasons. Butler was a dynamic and colorful character whose bold actions brought attention to himself and the Marine Corps. When his tenures as the commander of MCB Quantico were combined, he was the longest-serving commander of that installation, which contributes to the likelihood that development of the installation under his command would reflect his influence. In addition, Butler was head of the base during the formative years following World War I when the Marines were struggling to justify their existence as separate from the Army; they were battling other branches of the military for severely limited fiscal resources. The commanding general's quarters at MCB Quantico have been nominated for the NRHP under Criterion B, and as part of that registration, the historic importance of Major General Smedley Butler was established, paving the way for this document to examine the recent use of Criterion B to list a specific property and how that might be accomplished elsewhere.

This section of the report was developed by examining and summarizing the history of MCB Quantico and the life of Smedley Butler using several sources including the NRHP registration form for the Quantico Marine Corps Base Historic District (Ensore et al. 1999) and *Quantico: Crossroads of the Marine Corps* (Fleming et al. 1978). Other sources include Internet resources for news articles and historic photographs, the MCB Quantico Cultural Resource Management Plan and other information provided by MCB Quantico Cultural Resource Manager John Haynes, and information obtained from the Smedley Butler papers at the Marine Corps Library Archives and other records housed at the Marine Corps History Center at MCB Quantico. The draft NRHP registration form for the commanding general's quarters was consulted.

After summarizing this information, the structures listed as contributing to the Quantico Marine Corps Base Historic District were reviewed and a list was made of those facilities whose construction dates corresponded with Butler's tenures as base commander. In addition, other structures and features described during research were listed. Recommendations regarding further research into structures that may be sufficiently associated with Butler and eligible for the NRHP under Criterion B for their association with him are found at the end of this report.

4.2 HISTORY OF MCB QUANTICO 1916 TO 1920

At the beginning of the twentieth century, the federal government was considering absorbing the Marine Corps into the Army; then, in 1910, it was decided that the best use of the Marine Corps was as an "advanced base force" that could meet any immediate call to defend advanced bases. In 1916, as the United States faced the ever more real possibility it would be pulled into the European conflict, the government authorized a peacetime Marine Corps force of 15,600 and an emergency force of 18,100. As the number of Marines expanded, it became obvious that the Navy facilities where they were housed, including the Philadelphia Naval Yard, were not adequate to house or train the East Coast Advanced Base Force. The Marines needed room for artillery and infantry maneuvers that was accessible by water and rail. However, before a location for a new base could be found, the United States declared war on Germany on April 6, 1917. That same day the Marine Corps Commandant developed a board to find a

location for an East Coast base. On April 16, 1917, the board visited the Quantico area and recommended a 5,300-acre tract as a suitable location (Fleming et al. 1978:20–22).

The war plan was for the new Marine Corps recruits to receive 8 to 12 weeks of initial training at the new depot at Paris Island, South Carolina, and at Mere Island, California, after which they would be sent to MCB Quantico for additional training to prepare them for combat in France. The base opened on May 14, 1917, and four days later the first Marines arrived for training. Initially, all facilities and men were housed in tents; a group of almost 350 new officers came to MCB Quantico for training in July 1917, attending a three-month-long “officers’ camp of instruction.” The 5th Regiment of the Advanced Base Force was recalled after being disbanded, and after short, intense training at MCB Quantico, the 5th Regiment left for France (Fleming et al. 1978:22–26).

The first Marine officer training school in 1891 (the School of Application) was housed at the Marine barracks in Washington, D.C. In 1909, the school was moved to Annapolis and renamed the Marine Officers’ School, and in 1910 it was moved again, this time to the Naval disciplinary barracks in Norfolk, Virginia. In 1916, the school in Norfolk was scarcely being used and it seemed only logical to move the school to MCB Quantico where the new officers were being trained for deployment to France. In addition to the training offered at MCB Quantico, in 1917 the 5th, 6th, 8th, and 9th regiments were formed at MCB Quantico (Fleming et al. 1978:26–29).

Development of the temporary base at MCB Quantico initially consisted of tents, followed by temporary wood-framed buildings in corn-stubble fields and in between tree stumps. In August 1917, the base hospital moved to a wood-frame building and several wood-framed barracks. Some of the buildings were moved from the former Marine barracks at Stump Neck, Maryland. Brigadier General John A. Lejeune assumed command of MCB Quantico in September 1917. Lejeune wanted additional structures including paved streets, a gymnasium, a library, and housing for married soldiers. There was limited married housing in a small hotel overlooking the town of Quantico. The hotel became Marine property in 1918, was named Waller Hall, and was designated bachelor officers’ quarters until it was razed in 1968 (Fleming et al. 1978:26–28).

At the close of 1917, several 50-man barracks had been constructed, as well as mess halls, kitchens, and lavatories for each barracks; a large cold storage and a laundry. The company the Marines Corps leased the property from was failing and offered to allow the Marines to purchase the land, which they did. Congressional legislation authorized the land acquisition and creation of a permanent Marine Corps base in December 1918 (Fleming et al. 1978:31).

Once in-theater, the 5th and 6th regiments combined to form the 4th Marine Brigade, which was then combined with the 3rd Army Brigade to create the U.S. 2nd Division. While in France, General John Pershing requested that MCB Quantico provide three replacement battalions, which shipped out in early 1918. After the 4th Brigade began suffering higher than expected casualties, two replacement battalions per month were sent from MCB Quantico to France. The 10th and 11th regiments, the Marines’ first artillery regiments, were formed at MCB Quantico in 1918. Training became more formalized in 1918 for units and for new individual recruits. The first officers’ training camp started at MCB Quantico in April 1918 with 600 candidates, most of who graduated in July or August. The second class graduated in December, and the third class graduated in July 1919, but was assigned to the Marine Corps Reserves because the war had ended. MCB Quantico created the “Overseas Depot” in May 1918 with the dual purpose of training individual replacements and entire units. Training at MCB Quantico included machine gun, support arms, tactics, first sergeants, mess sergeants, cooks, clerks, bayonet, bombing, gas, scout-sniper, and mines courses. In addition, most of the corpsmen in France in World War I were trained at MCB Quantico; however the majority of training for organized units took place in the field (Fleming et al. 1978:31–34).

An aviation unit was formed at MCB Quantico in June 1918 to support the artillery forces, which included the creation of a balloon company. The unit contained balloons and seaplanes housed in a temporary hanger near the present-day Marine Corps Air Station. The company never left MCB Quantico, but did train with artillery units until war's end when the Balloon Company was deactivated in July 1919 (Fleming et al. 1978:34–35).

The first base commander, Brigadier General Lejeune, deployed to France and Colonel Smedley D. Butler took command for a short time from May 1918 to June 1918. Congress approved an increase of the Marine Corps to a total of 78,800 in July 1918. The expansion troops did not arrive until August 1918, and at that time the 5th Brigade was formed. Butler left for France in mid-September in command of the 13th Regiment. MCB Quantico was left in the command of Brigadier General Charles Doyen. Before the Armistice on November 11, 1918, MCB Quantico deployed 30,000 Marines to Europe. There were still several thousand in training at the end of the war, and in February 1919, the newly formed 15th Regiment was deployed to the Demonian Republic where it served for three years (Fleming et al. 1978:35–36).

When the Marine aviation units returned from Europe, the Marine Flying Field in Miami, Florida, was closed so land south of Chopswamsic Creek near MCB Quantico was leased and Squadron C arrived in June 1919 and began building two flying fields (Field No. 1 and Field No. 2). The Northern Bombing Group, Squadron A, came to MCB Quantico in September 1919 and began building barracks, seaplane and landplane hangers, offices, and other buildings. These facilities were separate from the Marine barracks and access necessitated driving several miles around swamp land (Fleming et al. 1978:36–38).

By August 1919, with the exception of units in the Caribbean and one in Europe, the Marine Corps wartime units had largely been demobilized. Major General Lejeune resumed command of Quantico in October 1919 with Colonel Butler remaining as chief of staff. Lejeune felt the carnage of the war was attributable to the loss of military intelligence and decided the Marine Corps would lead the way forward after the war with MCB Quantico as the center of education for both officers and enlisted Marines. The first three schools started by Lejeune taught auto mechanics, music, typewriting, and shorthand. Lejeune believed that the vocational training would keep Marines sharp and would offer skills that could be used in civilian life, attracting civilians to the Marine Corps because it had more to offer than being a soldier. His hopes were that his university would attract civilian educators to offer graduate programs to Marines and attract industrialists to offer post-service employment to the well-educated soldiers. Lejeune retained the officer training program and opened the Marine Corps Officers Training School in 1919, and the Marine Officers Infantry School in 1920. These schools were combined into the Marine Officers Training School in 1922. Chief of Staff Colonel Butler was quoted in 1920 as saying that it was their goal to make MCB Quantico a Marine Corps “great university” (Fleming et al. 1978:38–41).

4.2.1 Smedley Butler and MCB Quantico

In 1898, during the war against Spain, Smedley D. Butler, at age 16, was commissioned as a second lieutenant in the Marine Corps. Almost immediately he was sent to Guantanamo, Cuba, and then to northern China. After performing bravely during the Boxer Rebellion, Butler was promoted to captain by brevet two weeks before his 19th birthday, and was one of only 20 Marines to receive the Marine Corps Brevet Medal when it was created in 1921 (Hansen 2008).

In 1903, Butler helped protect the U.S. Consulate in Honduras, and during that time he earned the nickname “Old Gimlet Eye” for the piercing looks he was known to give people. Butler married Ethel Conway Peters in 1905, and they had three children. He served for three years, from 1909 to 1912, in Nicaragua. Colonel Butler was commander at MCB Quantico from May 1918 to June 1918 before he deployed to France. During World War I, Butler earned the Distinguished Service Medal of the Army and

Navy and the French Order of the Black Star and was temporarily promoted to Brigadier General and given command of Camp Pontanezen in Brest, France (Hansen 2008).

After the war, Butler served as Lejeune's chief of staff until he was given command of MCB Quantico in July 1920, becoming the first commander to occupy the recently completed Commanding General's Quarters, Building 1. He had assisted Lejeune in establishing MCB Quantico as a Marine education mecca and continued the efforts on that front when he assumed command. Butler expanded the schools at MCB Quantico despite severe fiscal constraints, and by 1924 there were 14 full-time instructors (Fleming et al. 1978, Hansen 2008). Butler was reported in the April 16, 1920, issue of *Leatherneck* to have said of the schools at MCB Quantico, "We are going to make a regular military college, and all students will be cadets. The private soldier will . . . be fitted to go out a self-respecting young man, who can look the world square in the face because of his training here." Butler went on to say, "The school system here has come to stay and has made such an impression on Congress . . ." (Butler Papers, Alfred M. Gray Marine Corps Research Center at MCB Quantico).

Butler was instrumental in the permanent construction at MCB Quantico, which began in 1918 with bungalow-style company offices, mess halls, barracks, lavatories, and family officers' quarters. Butler's funding woes extended beyond his educational program to his construction plans. To reduce construction costs, Butler used Marines to clear the landscape and build temporary structures (Hansen 2008).

In a memo dated October 8, 1921, Major General Commandant Lejeune praised the officers and enlisted men of MCB Quantico for their construction efforts on the post. He stated "Not the least of your accomplishment is the fact that you have been so successful in developing the material part of the Post with so small an expenditure of the government funds" (Butler papers, Alfred M. Gray, Marine Corps Research Center at MCB Quantico). Lejeune assigned Butler as the high-ranking officer on a master planning board for MCB Quantico in 1923. In 1927, as a result of the master planning board, Congress appropriated \$2.2 million for new construction at MCB Quantico that would, in part, house the future Marine Corps University (Hansen 2008).

Butler influenced the development of Marine aviation while commander of MCB Quantico. Construction of 2 hangars and 14 barracks was completed at the installation in 1920. In 1921, the MCB Quantico airfield received five torpedo planes (Fleming et al. 1978:44). Between 1920 and 1924, aerial maneuvers at MCB Quantico included air to ground pickups (via a message hung from two poles), aerial photography, and night flying (Hansen 2008). These flying maneuvers later became instrumental in close ground support of Marine amphibious landings and in securing advanced bases (Fleming et al. 1978, Hansen 2008). The longest flight of the time was flown in 1921 by Marine aviators from Washington, D.C. to Santo Domingo, Dominican Republic, and back (Fleming et al. 1978:44). The development of the aerial training program at MCB Quantico continued after Butler's first tenure as base commander; in 1926 aerial aviation courses were developed on the base as well as the Barrage Balloon Training School in 1941 (Hansen 2008).

In 1923, Commandant Lejeune reported that MCB Quantico had completed several construction projects over the previous year. These projects included concrete foundations under the World War I wood-frame temporary buildings and construction of officers' quarters from dismantled temporary buildings from other facilities (Fleming et al. 1978:48).



(Photo Courtesy of MCB Quantico CRM)

FIGURE 2. JIGGS IN UNIFORM

60,000 fans; the Marines won 38 of their first 42 games (Fleming et al. 1978:43). In 1921, Butler purchased a bulldog named Jiggs, the official MCB Quantico mascot, who he enlisted in the Marine Corps and who rose to the rank of Sergeant Major in just three short years (figure 2). Butler also promoted MCB Quantico baseball and basketball teams (Hansen 2008).

With his flair for publicity and insight regarding the benefits of public recognition to counteract the isolationist military policies after World War I, Butler began conducting well-publicized marches to military events at Civil War battlefields around the Washington, D.C., area. These events were exercises in military maneuvers. The events attracted thousands of spectators and when the battles were approached as contemporary military problems, they included the use of modern equipment including planes, search lights, anti-aircraft guns, tanks, etc.” (Hansen 2008, Fleming et al. 1978:42).

A football program was started at MCB Quantico in 1919, and Butler raised the “Fighting Bulldogs” (the Marine football team) to a level of national prominence, bringing recognition to the Marine Corps sports program. Butler’s passion for Marine football led him to develop a program that was on a par with the Army, Navy, and collegiate football programs. Marine football games attracted up to



(Photo courtesy of MCB Quantico Cultural Resource Manager)

FIGURE 3. BUTLER STADIUM UNDER CONSTRUCTION

Butler’s enthusiasm for football spilled over into his most ambitious and least funded project—construction of a football stadium at MCB Quantico (figure 3). His goal was to build the largest football stadium in the world at 380 ft by 760 ft, with a seating capacity of 33,000 (Butler Papers, Alfred M. Gray Marine Corps Research Center at MCB Quantico). Butler was only able to secure \$5,000 for construction of the stadium, which was largely spent on concrete. The actual stadium construction was begun in 1921 and was mostly built with Marine labor. It is an earthen berm amphitheater with concrete bleachers. The sandstone used during construction was quarried from the base (Smith 2007). A stream ravine was excavated and the stream was re-routed through a concrete pipe under the playing field. Local contractors donated sand and gravel for the project and the Richmond, Fredericksburg, and Potomac Railroad

provided used rails for steel. All ranks were required to work on the stadium; however, interruptions in construction by training and deployments ensured the stadium was not finished until after World War II. Even before it was completed, the facility was used for football and a variety of other sports activities during the 1920s (Fleming et al. 1978:43–44). The completed stadium only seats 10,000, not the 33,000 Butler had envisioned.

Butler became the Public Safety Director for Philadelphia in January 1924, taking a leave of absence from the Marine Corps. He returned to the Marine Corps during the 1927 Marine landing in China. In July 1929, he returned to MCB Quantico as base commander and remained until his retirement in 1931 (figure 4) (Fleming et al. 1978:56).

After his deployment to China at age 48, Butler became the youngest person in the Marine Corps as of that date to be made Major General. Back at MCB Quantico, Butler began advocating for high level sports again. Reportedly, after a riot at a Navy-Marine football game, Butler was instructed to de-emphasize contact sports.

During his second tenure as base commander, Butler created an environment of immaculately kept grounds and precision drills. In this effort, Butler also purged the town of Quantico of bootleggers and other unwanted individuals and practices by boycotting its legitimate businesses until the town was rehabilitated (Fleming et al. 1978:57).

Butler wrote the Commandant in July 1930 requesting new aircraft to replace the dilapidated and obsolete planes used at MCB Quantico. In the same request, Butler emphasized his recent reliance on the air squadrons in China and their exemplary performance. He further recommended that all Marine Corps air squadrons be increased from 6 to 18 planes (Butler Papers, Alfred M. Gray Marine Corps Research Center at MCB Quantico). As aircraft activities increased, along with the size of planes, it became clear that existing airfield landing strips were not long enough. In 1930, construction on a new airstrip was begun. The greatest challenge of this endeavor was compacting and filling the swampland where the airfield was being constructed (Fleming et al. 1978:59). In 1989, Butler's impact on Marine Corps aviation and education was commemorated by naming the newly built Marine Air-Ground Training and Education Center in his honor (Caulfield 1989).

In 1930, the Marine Corps Commandant died leaving Butler as the ranking Major General in the Marines. When he was overlooked for the Marine Corps Commandant appointment, Butler retired from the Marine Corps on October 31, 1931. He died in 1940, the most decorated Marine in U.S. history, having received 16 medals including 2 Medals of Honor and 1 Marine Corps Brevet Medal, which were all for separate actions.

A biography written about Smedley Butler on June 28, 1930, stated, "General Butler might be called the Godfather of Quantico. It was a semi-barren spot when he took it over. His irresistible energy secured the wholehearted cooperation of everybody and a miracle of accomplishment has resulted. There is yet much to be done, and it will be done. Others have done constructive work in Quantico but General Butler leads



FIGURE 4. SMEDLEY BUTLER RETIREMENT CEREMONY, 1931

them all in this respect. Space is too meager to even begin the tale. Let Quantico speak for herself”
(Anonymous 1930, Butler Papers, Alfred M. Gray Marine Corps Research Center at MCB Quantico).

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5.0 QUANTICO MARINE CORPS BASE HISTORIC DISTRICT

In 2001, the Quantico Marine Corps Base Historic District was listed in the NRHP under Criterion A for its significance to the broad patterns of military history, and Criterion C for its architecture. There are 239 contributing buildings, objects, and sites within the district, and 188 noncontributing buildings, sites, and structures. Table 4 lists the buildings within the historic district that were built during Major General Smedley Butler’s tenures. The district demonstrates seven areas of historical significance in U.S. history including aviation, education, African American Marine barracks, first permanent construction, Lustron, naval clinic, and industry. Its period of significance is 1918 to 1949 (Enscore 1999).

TABLE 4. BUILDINGS CONSTRUCTED DURING BUTLER’S TENURES AS BASE COMMANDER THAT CONTRIBUTE TO THE QUANTICO MCB HISTORIC DISTRICT (ENSCORE ET AL. 1999)

Building No.	Historic Function (Modern Function)	Year Built	NRHP Listing
4	Auto Hobby Shop	1920	Quantico Marine Corps Base Historic District, Criteria A and C, Aviation
72	Hanger (Museum)	1930	Quantico Marine Corps Base Historic District, Criteria A and C, Aviation
2111	Liquid Fuel Storage	1929	Quantico Marine Corps Base Historic District, Criteria A and C, Aviation
3233	Hanger (Museum Storage)	1923	Quantico Marine Corps Base Historic District, Criteria A and C, Aviation
A	Enlisted Housing	1929	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
B	Enlisted Housing	1929	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
C	Enlisted Housing	1929	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
D	Enlisted Housing	1929	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
E	Enlisted Housing	1929	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
1	Commanding General's Quarters	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction; Commanding General's Quarters, Criteria B Military
6	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
8	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
11	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
12	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
13	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
108	Officer Housing	1923	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
110	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
114	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction

TABLE 4. BUILDINGS CONSTRUCTED DURING BUTLER'S TENURES AS BASE COMMANDER THAT CONTRIBUTE TO THE QUANTICO MCB HISTORIC DISTRICT (ENSCORE ET AL. 1999)

Building No.	Historic Function (Modern Function)	Year Built	NRHP Listing
122	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
133	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
146	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
165	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
169	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
170	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
180	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
184	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
190	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
191	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
195	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
196	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
326	Officer Housing	1922	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
370	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
374	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
376	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
418	Officer Housing	1923	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
601	Officer Housing	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
1002	Paymaster Officer (Beauty Shop)	1924	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
1018	"Iron Mike" Statue	1921	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction--Listed as an Object
1019	Administration (Marine Corps Headquarters)	1920	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
1744	Stadium	1921-1945	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction--Listed as a Site
2006	Battalion Headquarters	1931	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction
3199	Girl Scout Cabin (Youth Cabin)	1931	Quantico Marine Corps Base Historic District, Criteria A and C, First Permanent Construction

Of the 43 structures listed in table 3 within the historic district that are from the Butler era, only one has been specifically associated with Butler as eligible for the NRHP under Criterion B. A draft NRHP registration form has been completed for Building 1, the Commanding General's Quarters, to list the Dutch Colonial Revival-style house under Criterion B for its relationship to Smedley Butler. Butler was the first to occupy the newly constructed home in 1920 when he took command of Quantico and lived there during both occasions of his command when he made significant contributions to Marine Corps education, aviation, and sports (Hansen 2008).

Building 1 is the largest residential structure on Quantico and was built on a large lot on top of a hill reflecting the elevated status of its occupant. The plans used to construct the house were produced by the Navy Bureau of Yards and Docks, the branch of the Navy responsible for designing and overseeing construction of all Navy and Marine Corps structures; it was built by the John K. Turton Company, the noted building contractor based in New York. Building 1 was only one of over 300 initially authorized structures for the new base at Quantico to be built in the "Flemish farmhouse" variant of the Dutch Colonial Revival style. The two-story structure has a distinctive gambrel roof, wide, flared eaves, and a textured appearance with multiple types of exterior finishes including stucco, stone, and brick on the lower level and weatherboard on the upper level (Hansen 2008).

Other structures built at the time Butler was in command at MCB Quantico should be evaluated to determine if they are associated with the decorated Marine. In a letter dated June 19, 1922, to Major General Commandant Lejeune, Eli Hemlick, a War Department inspector general, conveyed his admiration for Butler and his men. Hemlick wrote, "The projects planned and completed or under construction, the work on which was being done by members of the command, such as the stadium, officers' club, exercise fields, etc., show a fine vision on the part of General Butler..." (Butler papers, Alfred M. Gray Marine Corps Research Center at Quantico). Lejeune's and Hemlick's recognition of Butler's contributions to the built environment at Quantico should be further investigated to include any still extant structures that may be associated with him.

An argument could be made that any structure built using Marine labor during the time Butler was base commander at MCB Quantico should also be evaluated under Criterion B for its association with Butler. During his tenure, he often used Marine labor to clear areas for construction and even to perform construction of some buildings, thereby reducing costs. In addition, Butler's support of Marine aviation tactics and his efforts to construct airfields with aviation support facilities at MCB Quantico could also tie the remaining aviation facilities built between 1920 and 1924 and between 1929 and 1931 to Butler, including the new airfield construction begun in 1930. However, this argument is problematic because Butler did not design the buildings and did not occupy them. The question becomes then, is there anything about the architecture of those buildings that is representative of Butler's military accomplishments or his efforts to bring the Marine Corps recognition.

Having a knack for public relations and being the enduring sports enthusiast, Butler began his most personal building project in 1921 when he began construction of a football stadium in a wooded stream valley, between the living quarters and rifle ranges (figure 5). Butler Stadium, named for Butler, was his pet project. With only \$5,000, donated materials, and Marine enlisted and officer labor, Butler built an earthen berm amphitheater for his beloved "Fighting Bulldogs."

The stadium is listed as a contributing site to the Quantico Marine Corps Base Historic District, but like Building 1, an argument can be made that the structure is eligible for the NRHP under Criterion B for its association with the militarily and historically significant Butler, whose vision, leadership, and drive was the motivating force behind the stadium and the Marine Corps football team, which gained national attention by playing collegiate powerhouses and other military branch football squads.



(Photo Courtesy of Quantico Cultural Resource Manager)

FIGURE 5. BUTLER STADIUM, 1940S

Even though the stadium was renovated in 2008 to upgrade the running track and other facilities, it is within the boundaries of the historic district and retains integrity of setting, feeling, and association. Furthermore, the earthen berm stadium, which has remained virtually unchanged in design and materials, would unquestionably be recognized by Butler today.

The college campus-like layout of the early buildings at MCB Quantico can be attributed to Butler's vision of the base as a Marine Corps university. During his first tenure as base commander from 1920 until 1924, Butler was responsible for turning the installation into the center for Marine Corps officer instruction and Marine Corps officer and enlisted vocational training (Fleming et al. 1978). He was also the highest ranking officer on the MCB Quantico master planning board organized in 1923 by Marine Corps Commandant Major General Lejeune. As base commander, the placement of structures built while he was in command would likely reflect his direction and desires. In addition, buildings erected later under the master plan that was developed under his oversight would likely also reflect Butler's vision for MCB Quantico. In this instance, however, it is not the buildings that represent an association with Butler, but rather the base layout that reflects his goal of making MCB Quantico into a Marine Corps university.

Training at MCB Quantico during World War I was meant to be realistic. French and Canadian officers with extensive battlefield experience served as advisors. Troops built trenches and dugouts representing the Allied and German sides, with a barbed-wire no-man's-land between the trenches, and then attacked by sapping, artillery barrages, trench raids, and frontal assault. One trainee remarked, "What do you think? I am at Chateau-Thierry! A whole section of the Virginia woodland has been taken over and blasted, dug, and mined by the miners and sappers of the Marine Corps until it is almost an exact replica of the country around Chateau-Thierry and Vimy Ridge." According to Marine General Lester A. Dessez's reminiscences, Butler had a hill

flattened to conform to the Chateau-Thierry map, much to the distress of the French captain who insisted that the map should conform to the ground, not visa-versa (Schmidt 1987).

Archaeological investigations at MCB Quantico have revealed at least two sets of World War I training trenches within the original land leased by the Marine Corps during World War I. Limited research was conducted in an effort to confirm the above reference to the intentional manipulation of the topography at MCB Quantico to mimic the battles in France. Unfortunately, there is little detailed topographic information available for the Chateau-Thierry and Vimy Ridge areas of France. Additional field investigations, lidar photography, and comparison of topographic maps of the location of the trenches at MCB Quantico and the World War I battlefield landscape in Chateau-Thierry and Vimy, France, should be conducted to determine if indeed there was intentional manipulation of the land at MCB Quantico. Additional research would also be required to determine Butler's level of involvement in that landscape manipulation in order to assess the property's association with Butler.

5.1 CONCLUSIONS

Smedley Butler was a remarkable Marine. After having joined the Marine Corps at age 16, he rose through the officer ranks quickly to become the youngest Major General in Marine Corps history at the age of 48. Butler's contributions to Marine Corps history resulted in the development of Marine Corps aviation as a tool for close-ground support during amphibious landings and offensives to capture and hold near-shore enemy bases; the establishment of a comprehensive Marine Corps education program to attract and retain quality recruits while giving them skills for life after the military; the engagement of the public around Washington, D.C., through public relations events like marching to Civil War battle sites and re-enacting battles; and promoting Marine Corps sports, especially football.

Although there are over 230 buildings, sites, and objects in the cantonment area at MCB Quantico listed in the NRHP as contributing to the Quantico Marine Corps Base Historic District under Criteria A and C, there is currently only one building, the Commanding General's Quarters, being considered for listing under Criterion B. However, Butler's contributions to Marine history and MCB Quantico, including construction of the stadium at MCB Quantico, suggest there are other structures on the base that should be examined for their association with Butler that may also be eligible or listing under Criterion B. Specifically, due to the fact the stadium was Butler's pet project and was associated with his effort to create a nationally recognized Marine Corps sports program, it should be evaluated. Other items that require additional research include the World War I training trenches at MCB Quantico, the university-style layout of the cantonment area, which are linked to Butler and the master plan he guided, and buildings at the airfield and the airfield itself, which may be associated with Butler's term as base commander and his support of Marine Corps aviation. Other properties that should be researched include properties that were built by Marines under Butler's command rather than being built by outside contractors.

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APPENDIX A: ACRONYMS AND ABBREVIATIONS

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ACRONYMS AND ABBREVIATIONS

ACHP	Advisory Council on Historic Preservation
AFB	Air Force Base
CFR	Code of Federal Regulations
DoD	Department of Defense
MCB	Marine Corps Base
NARA	National Archives and Records Administration
NHPA	National Historic Preservation Act of 1966, as amended
NRHP	National Register of Historic Places
NPS	National Park Service
SHPO	State Historic Preservation Office(r)
THPO	Tribal Historic Preservation Officer

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**APPENDIX B:
CHECKLIST FOR EVALUATING PROPERTIES UNDER CRITERION B**

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Criterion B Research Check List

Records to Review Prior to Field Work: At a minimum these should be reviewed as part the pre-field work records review. If this research identifies any individuals that may be historically, significant, additional research is required to identify properties associated with that person and additional research is needed to determine the person's area and period of significance. This research should be conducted through these records and those listed in the second list of resources.

	Reviewed	Not Available
Installation CRM Records		
Previous Surveys / Determinations / NRHP Registration Forms		
Installation Real Property/DPW Records		
Construction Booms		
Installation Use Booms		
Buildings with Commemorative Names		
Unique / Outstanding Bldgs, Sites, Structures, Features		
Installation Historian		
List of Base-commanders		
Photos		
Oral Histories		
Unit Histories		
Installation History		
Installation Museum		
Historic Maps		
Historic Aerials		
SHPO Records		

Records to Review After Initial Work: At a minimum these resources should be identified and reviewed if a potentially historically significant individual is identified and if properties were recorded that may be associated with that individual. Review of these resources would result in a determination that the person and or property does not meet the threshold for NRHP eligibility under Criterion B or in providing the basic information and framework for the historic context of the significant person and property.

	Reviewed	Not Available
Biographies		
Autobiographies		
Local Libraries and Historic Societies		
Newspaper archives		
Branch Historic Records/Branch Library		
Museum(s)		
National Archives and Records Admin		
U.S. Corps of Engineers Library		
Others		

Criterion B Evaluation Checklist

<u>General Property Information</u>			
Property Name: _____			
Other Property Identifiers: _____			
Location Address: _____			
Location UTM: _____			
Construction Date: _____			
Part of a Historic District:		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If Yes, Name of District: _____			
		Contributing <input type="checkbox"/>	Non-Contributing <input type="checkbox"/>
Property Type:	Building	<input type="checkbox"/>	District <input type="checkbox"/>
	Structure	<input type="checkbox"/>	Site <input type="checkbox"/>
	Object	<input type="checkbox"/>	<input type="checkbox"/>
Architectural Style: _____			
Design Alterations		Yes <input type="checkbox"/>	No <input type="checkbox"/>
If Yes, Explain: _____			

<u>Person of Association:</u>			
Name: _____			
Birth and Death: _____			
Date of Association with Property: _____			
Area(s) of Significance (Contribution to History) Be Specific to include how this person was singularly influential in all areas:			
	Agricultural	<input type="checkbox"/>	Invention <input type="checkbox"/>
	Architecture	<input type="checkbox"/>	Landscape Architecture <input type="checkbox"/>
	Archaeology	<input type="checkbox"/>	Law <input type="checkbox"/>
	Art	<input type="checkbox"/>	Literature <input type="checkbox"/>
	Commerce	<input type="checkbox"/>	Maritime History <input type="checkbox"/>
	Communication	<input type="checkbox"/>	Military <input type="checkbox"/>
	Community Planning	<input type="checkbox"/>	Performing Arts <input type="checkbox"/>
	Economics	<input type="checkbox"/>	Philosophy <input type="checkbox"/>
	Education	<input type="checkbox"/>	Politics/Govt <input type="checkbox"/>

Engineering Entertainment/Rec Ethnic Heritage Exploration/Settlement Health Industry	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	Religion Science Social History Transportation Other	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Explain:			
Level of Significance (Local, Regional, National)			
Association with Property:			

Property Integrity Assessment			
Original Location:	Yes	<input type="checkbox"/>	No
Comments on Design:			
Interior			
Original Interior Materials: Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
If No, Explain:			
Retention of Interior Workmanship	Yes	<input type="checkbox"/>	No
If No, Explain:			

Comments on Interior Setting:	
Overall Assessment of Interior Feeling:	
<p>Exterior</p> <p>Original Exterior Materials: Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p style="padding-left: 100px;">If No, Explain:</p>	
<p>Retention of Exterior Workmanship Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p style="padding-left: 100px;">If No, Explain:</p>	
Comments on Exterior Setting:	
Overall Assessment of Exterior Feeling:	

APPENDIX C: PREPARERS

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In 1990, Congress passed legislation establishing the DoD Legacy Resource Management Program to provide financial assistance to DoD efforts to preserve our natural and cultural heritage. The program assists the DoD in protecting and enhancing resources while supporting military readiness. This project was awarded in 2010 to AARCHER, Inc.

The cultural resources management specialist for the DoD Legacy Resources Management Program is Ms. Cecilia Brothers. The project sponsors were Dr. Sue Goodfellow, Marine Corps Headquarters, and Mr. John Haynes, Marine Corps Base Quantico, sponsored the project. Mr. Haynes served as technical point of contact for the project.

The principal investigator and primary author for this report was Karstin Carmany-George. Ms. Carmany-George is an archaeologist and historian and served as the first cultural resource manager for the Indiana National Guard, and in that position, developed an award-winning, comprehensive program combining GIS, archaeological fieldwork, historic research, and consultation to ensure the agency is able to meet its goal of troop readiness training while maintaining compliance with federal and state laws. Her sections 106/110 and NEPA project experience includes, but is not limited to, an expedited Section 106 process for development of a mental hospital historic district into an urban training center; resource evaluation and management using GIS, in-depth historic context used to evaluate historic archaeological sites, land development and use; and programmatic agreement development. Ms. Carmany-George has participated in over 400 archaeological projects in compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. She has participated in other anthropological and ethnographic projects including two ethnographic field studies to various American Indian reservations, American Indian advisory councils in an ethnographic museum setting, and an ethnographic study of gender relations on the campus of Ball State University, collaborative museum exhibition development with local American Indians, and tribal notification procedure development in compliance with cultural resource management.

Ms. Jayne Aaron, LEED AP, served as project manager and technical advisor. Ms. Aaron is an architectural historian with almost 20 years of experience as a program and project manager, architectural historian / cultural resources specialist, and NEPA specialist. She has, (1) managed programs and contracts for federal clients, (2) meets the qualifications of the Secretary of the Interior for Architectural Historian, (3) has inventoried and evaluated hundreds of buildings and structures for the DoD and other federal agencies; (4) has developed cultural resource management plans for numerous military installations integrating agency mission with regulatory compliance and cultural resource management; (5) has participated in consultation and meetings with a variety of stakeholder groups, including state and federal regulators, American Indian tribes, environmental consultants, and the public; (6) has written public media releases, given presentations, responded to public comments, and facilitated meetings for various-sized groups; and (7) has worked with numerous agencies on every facet of cultural resources identification, compliance, consultation, and NEPA.

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