

UNITED STATES ARMY GARRISON WEST POINT
WEST POINT, NEW YORK

INTEGRATED CULTURAL RESOURCES
MANAGEMENT PLAN



December 1, 2011

Front cover: The focal point of the United States Military Academy, The Plain, is both dominated and defined by the distinctive military gothic architecture of Washington Hall and the Cadet Chapel.
[courtesy: Public Affairs Office, U.S. Military Academy]



STONE FORT CONSULTING

UNITED STATES ARMY GARRISON WEST POINT
WEST POINT, NEW YORK

INTEGRATED CULTURAL RESOURCES
MANAGEMENT PLAN

Prepared for:

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Note: The chapter artwork is adapted from a woodcut of “West Point in 1780” that first appeared in the *New York Magazine* in 1790 and was published in Benson J. Lossing, *The Pictorial Field-Book of the Revolution* (New York: Harper & Brothers, 1851) Volume I, Chapter XXX.



Executive Summary

West Point has considerable legal responsibilities established by Federal laws and implementing regulations related to the identification, preservation, and management of cultural resources within its limits. Under Chapter 6, Army Regulation 200-1, the Superintendent of the U.S. Military Academy, through delegation to the West Point Garrison Commander, must designate a Cultural Resources Manager (CRM) to coordinate the facility Cultural Resources Management program. The CRM performs day to day management of cultural resources, and insures that the USAGWP remains in compliance with all applicable Federal laws and implementing regulations. This Integrated Cultural Resources Management Plan (ICRMP) is intended to guide the CRM, and West Point leadership, in complying with the range of federal preservation requirements and Army regulations.

The mission of the West Point Cultural Resources Management Program is to:

- Directly support the military mission of the U.S. Military Academy at West Point by defining a sense of culture and heritage that directly impacts unit cohesion, morale, and combat effectiveness. As a result, the historic setting directly benefits the Corps of Cadets;
- Directly support military training by providing a venue for staff rides, tactical studies, and topographical instruction. The Revolutionary War fortifications are used for academic training by the Dean and for military tactics instruction by the Department of Military Instruction (DMI);
- Directly support quality of life for installation residents and military families by maintaining the historic landscapes, architectural standards, and visual aesthetics that significantly contribute to the sense of community and neighborhood on post; and
- Directly contribute to the esprit de corps of the West Point cadets, faculty, civilians, and residents.

This ICRMP is the third such document prepared at West Point, and represents a substantial revision of the previous ICRMPs. This revision of the ICRMP has been divided into two volumes, Volume I presenting the core plan itself, identifying roles and responsibilities, critical components, and fiscal year phasing; with all supporting background information and technical data provided in Volume II.

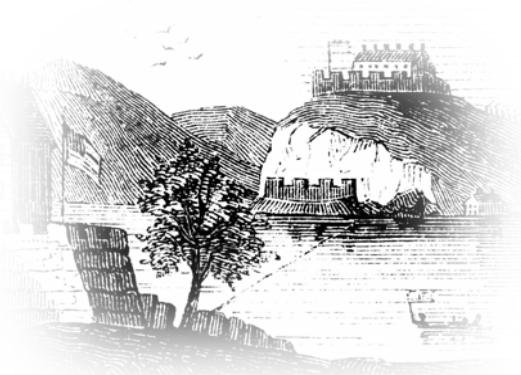
This ICRMP makes the following recommendations:

- 1.) While West Point has generally been in compliance the project review component of the NHPA, it should complete the consultation process with the New York State Historic Preservation Office (SHPO), and should enter into a Programmatic Agreement (PA) with the NY SHPO and Advisor Council on Historic Preservation to insure that the ICRMP is fully implemented, and that West Point maintains full compliance with the ICRMP.
- 2.) Re-establish the program to actively manage and preserve West Point's nationally significant cultural resources.
- 3.) Restore an effective Archaeological Resources Management program to monitor and safeguard West Point's collection of important archaeological resources, and to ensure that the Archaeological Resources Protection Act (ARPA) and Native American Graves Protection and Repatriation Act are legally enforced at West Point.
- 4.) Update and confirm the cultural resources component of the GIS databases.

- 5.) Transfer the DPW Archaeological Collection to the West Point Museum through an Memorandum of Understanding, where it is more readily available to historians and archaeologists for professional research;
- 6.) Revise the Installation Design Guide, by integrating the revised ICRMP with the previously prepared IDG.
- 7.) Update the Archaeological Resources Management Plan (originally prepared in 1995).
- 8.) Re-establish relationships with the Stockbridge Munsee Band of Mohican Indians, and establish formal consultation with the St. Regis Band of Mohawk Indians.
- 9.) A comprehensive history of the Olmsted landscape at West Point should be prepared, along with a comprehensive landscape management plan intended to develop a new Historic Landscape plan for the U.S. Military Academy, based upon the intent and principles formulated in the original 1911 Olmsted Plan.

During the five-year duration of the revised ICRMP, it is recommended that the CRM be eventually supported by a historic architect/architectural historian and archaeologist to facilitate CRM compliance and the performance of a successful program. The revised ICRMP provides a phased five-year program between FY 2011 and FY 2016 to incorporate its revisions that is believed to be realistically achievable within current budgetary constraints.





Chapter One

West Point Cultural Resources Management Program Introduction

West Point Cultural Resources Management Program Mission. The primary mission of the United States Military Academy (USMA) at West Point, New York is to “. . . educate, train, and inspire the Corps of Cadets so that each graduate is a commissioned leader of character committed to the values of Duty, Honor, and Country, professional growth throughout a career as an officer in the United States Army, and a lifetime of selfless service to the nation.” This mission is accomplished through the “West Point Experience,” a four-year cadet program that focuses on intellectual, physical, military, and moral development. The physical environment of the “West Point Experience” is rich in historic buildings, monuments, landscapes, and archaeological ruins and sites which provide daily reminders to the cadets of the traditions, continuity, and sacrifices of the Corps. These resources are vital to the quality of life on post.

The mission of the West Point Cultural Resources Management Program is to:

- Directly support the military mission of the U.S. Army Garrison at West Point by defining a sense of culture and heritage that directly impacts unit cohesion, morale, and combat effectiveness. As a result, the historic setting directly benefits the Corps of Cadets;
- Directly support military training by providing a venue for staff rides, tactical studies, and topographical instruction. The Revolutionary War fortifications are used for academic training by the Dean and for military tactics instruction by the Department of Military Instruction (DMI);
- Directly support quality of life for installation residents and military families by maintaining the historic landscapes, architectural standards, and visual aesthetics that significantly contribute to the sense of community and neighborhood on post; and
- Directly contribute to the esprit de corps of the West Point cadets, faculty, civilians, and residents.



An example of how cultural resources directly contribute to the West Point mission. These historic 1850s West Point Installation Gates, restored by the West Point Cultural Resources Management Office and the West Point Directorate of Public Works, open onto the Old Cadet Chapel and West Point Cemetery, which is now providing its third century of service to the U.S. Military Academy and West Point community.

[W. L. Powell, 2010]

Cultural Resources Management Program Introduction. West Point has many legal responsibilities related to the identification, preservation, and management of cultural resources within its limits. This Integrated Cultural Resources Management Plan (ICRMP) is intended to guide West Point in complying with the related CRM federal preservation requirements and Army regulations. The Superintendent and the Garrison Commander (as the Superintendent's designee for environmental actions) have direct responsibility for establishing an installation Cultural Resources Management program by means of an ICRMP that successfully merges cultural resources management within the process of achieving daily mission objectives. This ICRMP is designed to serve as a five-year plan for fiscal years 2012–2016 and replaces the 2007–2012 ICRMP. It follows the requirements to prepare an ICRMP as defined in Chapter 6, Army Regulation 200-1. It has been specifically tailored to West Point, outlining the facility cultural resources management program's history, achievements, objectives, responsibilities, standard operating procedures (SOPs), and future plans. It also reflects the latest guidance available and considers the current legal and regulatory mandates that apply to Army facilities. Although not a decision-making document, this plan provides the information necessary to enable the Superintendent, and those responsible for implementing his directives, to make informed decisions regarding the treatment of cultural resources at West Point.

This plan is divided into four principal sections:

- Chapter Two - A discussion of the legal and regulatory requirements that define the establishment of a U.S. Army Installation Cultural Resources Management program;
- Chapter Three- A discussion of the current organization and status of the West Point Cultural Resources Management Program;
- Chapter Four- Recommendations to guide the activities of the West Point Cultural Resources Management Program from completion of this ICRMP in FY 2011; through FY 2012 to FY 2016; and
- A number of appendices that contain critical supporting information including a Historic Context for West Point, a comprehensive listing of all Cultural Resources laws, regulations and policies; a bibliography to support the program; and implementing documents for the program.

Chapter Two provides a brief review of preservation laws and regulations and information regarding the cultural resources program—the roles and responsibilities, its history, information related to previous ICRMPs, and a summary of the major components of the program.

Chapter Three provides a background and assessment of the current Cultural Resources Management Plan at West Point.

Chapter Four provides specific, phased, prioritized recommendations for the development and implementation of this plan. This addresses the cultural resources requirements for the management of the West Point Installation by establishing a five-year plan for the facility's cultural resources management program. This plan includes policies, goals, and SOPs for cultural resources actions.

Finally, Chapter Five, Conclusions is essentially an Executive Summary for the entire document.

Volume II contains the necessary supporting documents to the plan in a series of Appendices. Appendix A includes a description of the installation, its size, and missions and an analysis of the cultural landscape that includes a discussion of the natural environment, and a historic context documenting the prehistoric and historic development of the installation.

Appendix B provides a review of West Point's existing cultural resources database including architectural, archaeological, and historic landscape properties and traditional cultural properties (TCPs). Summaries of previous and current archaeological and architectural studies and management plans, and a discussion on potential cultural resources yet to be identified are presented. Cultural resources surveys, inventories, and assessments conducted to date at West Point have resulted in the identification of a wide range of historic properties, including the following:

- National Historic Landmark District (NHLD) of 2,000 acres (approximately);
- Queensboro Furnace (National Register-listed);
- West Point Bullion Depository (National Register-listed; property of the U.S. Mint);
- 170+ known archaeological sites;
- 500+ historic buildings and structures (includes historic dams and bridges) ;
- 35+ historic monuments ;
- 17 historic landscapes; and
- 14 cubic yards of artifacts and associated records.

Appendix B comprehensively discusses this range of resources.



Cultural Resources establish the West Point landscape; and serve as permanent and unique features that inspire and motivate the Corps of Cadets and the West Point community. The 150-pounder Armstrong Gun, captured by the U.S Army in a complex combined arms amphibious operation at Fort Fisher, North Carolina in 1865, has been the most photographed artillery piece at Trophy Point since that time.

1885 View of Cadets at Armstrong Gun on Trophy Point [West Point Library]
 The Armstrong Gun on Trophy Point, January 2011 [D. R. Cubbison, January 2011]

Cultural Resources Issues Confronting West Point. Although the cultural resources at many military installations include collections of historic buildings, structures, and archaeological sites, few contain the number and the NHLD designation of those at West Point. The size of the district, its visibility as a prominent tourist attraction, its location within the facility, and the NHLD designation represent a source of pride and a unique challenge for the Army and the academy. The challenges are a result of the concentration of a number of installation activities within the historically designated area and the presence of development constraints. Consequently, the installation, and the cultural resources program more specifically, is constantly attempting to achieve harmony between mission activities and preservation of the facility's historic resources. This harmony is best achieved when:

- Cultural resources are considered early in the planning process when changes to project plans can be made or coordination regarding any effects can occur without delaying the proposed action;
- Section 110 compliance is an installation priority. Compliance includes the ongoing management and protection of known historic properties and the identification of unknown historic properties;
- Preventative and routine maintenance programs are based upon accepted protocols (including the Secretary of the Interior's standards for historic preservation, National Park Service preservation briefs, and West Point maintenance and repair SOPs) and are conducted regularly;
- Ground-disturbing and construction activities are monitored to ensure that historic properties are not damaged and all National Historic Preservation Act, Archeological Resources Protection Act, and Native American Graves Protection and Repatriation Act requirements/conditions are complied with; and
- West Point designers, program managers, and other applicable facility staff are well informed of the cultural resources program requirements and the diversity and significance of installation resources.

Many of these general issues are being addressed through implementation of this document, its associated PA, and current management practices. Included in Appendix G are SOPs designed to combat a number of the maintenance issues associated with historic buildings in accordance with the aforementioned protocols.





Chapter Two

West Point

Cultural Resources Management Program Requirements

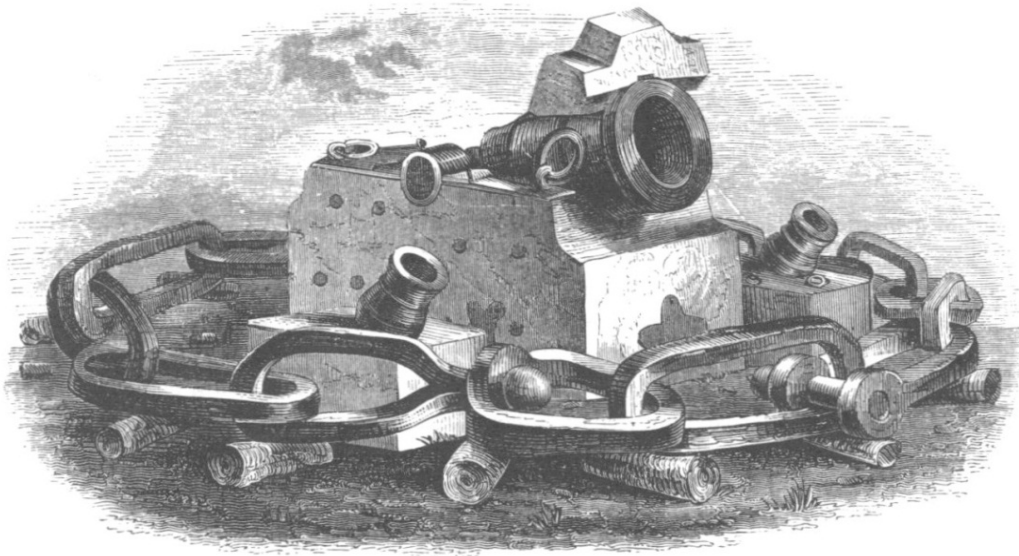
Introduction. The Department of Defense (DoD) is responsible for the protection of America's citizens, land, and natural and cultural resources. The DoD was one of the first federal preservation agencies in the country, when in the 1870s the War Department was given responsibility for protecting Yellowstone, the nation's first national park. All federal agencies are now required by law to take necessary measures to identify, preserve, and protect significant cultural resources under their jurisdiction and to carefully consider the effects that their actions will have on these resources. This Integrated Cultural Resources Management Plan (ICRMP) is intended to serve as the core document that will guide West Point in complying with federal preservation requirements, United States Army regulations, and DoD policies. It should also serve as the primary tool to implement the facility's cultural resources management program. As a comprehensive plan, this document has been designed to accomplish the following:

- Assist West Point in supporting mission requirements by ensuring that activities conducted as part of its mission address cultural resources management issues and legal compliance requirements.
- Serve as a component of the West Point Master Plan, to complement other facility plans such as an Integrated Natural Resources Management Plan (INRMP), Installation Design Guide (IDG), and Athletic Master Plan, to provide the Superintendent, or delegated official, with the information necessary to make informed decisions regarding the cultural resources under his/her control.

The need for developing and implementing the ICRMP is to comply with Chapter 6 of Army Regulation (AR) 200-1, Cultural Resources, and by reference, the applicable cultural resources legal requirements defined by the regulation. According to Chapter 6 of AR 200-1, ICRMPs shall be prepared and implemented by all federally owned or federally controlled Army installations having statutory and regulatory cultural resources management responsibilities. West Point is such an installation; therefore, development and implementation of the ICRMP is required.

This ICRMP contains a series of policies, SOPs, and objectives that will enable West Point to meet the legal responsibilities for management of its cultural resources. As such, it serves as a legal document intended to guide the cultural resources program and program components for FY 2012 through 2017. The Superintendent, Garrison Commander, and West Point personnel involved in planning activities, are the intended audience of this document. This includes, in particular, the Cultural Resource Manager (CRM) who is the individual responsible for the day-to-day management of cultural resources at West Point.

The goal of the cultural resources program is to support the military and academic missions of West Point by providing professional expertise and support services in the fields of history, architecture, archaeology, and historic preservation. This is achieved through ensuring full compliance with cultural resources legislation; contributing to historic preservation awareness; and developing a community-wide sense of stewardship for West Point's heritage.



West Point's Cultural Resources have been an integral part of the military landscape since both the founding of the nation and the establishment of the U.S. Military Academy in 1802. By early in the 19th Century, links from the distinctive and historic Hudson River Chain were displayed at Trophy Point to commemorate West Point's role in the American Revolution, and to serve as an inspiration to West Point cadets and members of the U.S. Army stationed at the installation.

Hudson River Chain at West Point with Saratoga Convention Mortars, c. 1850
 [Benson J. Lossing, *The Pictorial Field-Book of the Revolution* (New York: Harper & Brothers, 1851) Volume I, Chapter XXX]
 Hudson River Chain at Trophy Point, West Point, January 2011
 [D. R. Cubbison, January 2011]

Legal and Regulatory Requirements. All Federal installations and agencies are directed by a range of Federal laws, as implemented by the Code of Federal Regulations (CFR), to establish programs for the preservation of historic properties, as a core value of the U.S. Government and nation. Specific legal requirements defined by Chapter 6, AR 200-1 are set forth in the following laws and regulations:

- Antiquities Act of 1906 (16 USC § 431-433, 34 Statute 225);
- National Historic Preservation Act (NHPA) of 1966, as amended through 1992 (16 United States Code [USC] § 470-470w, 36 CFR [Code of Federal Regulations] § 800);
- National Environmental Policy Act (NEPA) of 1969 (42 USC 4321 et seq);
- Archeological and Historic Preservation Act (AHPA) of 1974 (16 USC § 469-469c);
- American Indian Religious Freedom Act (AIRFA) of 1978, as amended (42 USC § 1996– 1996a);
- Archeological Resources Protection Act (ARPA) of 1979 (16 USC § 470aa–470ll);
- Executive Order (EO) 13007, Indian Sacred Sites;
- Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (25 USC § 3001 et seq., 43 CFR § 10);
- American Battlefield Protection Program Act of 1996, as amended (P.L. 104-333, 16 U.S.C. 469k);
- Hudson River Valley National Heritage Area Act of 1996 (Title IX, P.L. 104-333)
- Curation of Federally-Owned and Administered Archeological Collections (36 CFR § 79); and
- Presidential Memorandum for Heads of Executive Departments and Agencies, titled Government-to-Government Relations with Native American Tribal Groups, dated April 29, 1994.

These laws and regulations are listed in Table 1, and a comprehensive discussion of these laws and regulations is provided by Appendix C.

A substantial body of federal legislation, regulations, and executive directives exist that outline the responsibilities of federal agencies for preservation of cultural resources and provides procedural guidelines for the management of federally owned or controlled properties (Table 1-1). Of these legal requirements, the National Historic Preservation Act (NHPA) of 1966 (16 USC § 470 et seq.) as amended, AHPA of 1974 (16 USC § 469a et seq.), National Environmental Policy Act (NEPA) of 1969 (42 USC § 4321 et seq.), and the Archaeological Resources Protection Act (ARPA) of 1979 (16 USC § 470aa-470ll) are the chief regulators designed to ensure adequate consideration of the value of historic properties in carrying out federal activities and to attempt to identify and mitigate impacts to significant historic properties. The term “historic properties” refers to cultural resources listed or eligible for listing in the National Register of Historic Places (NRHP). The NHPA is the principal authority used to protect historic properties; federal agencies must determine the effect of their actions on cultural resources and take certain steps to ensure that these resources are located, identified, evaluated, and protected.

Regulation 36 CFR § 60 establishes the NRHP and defines the criteria for evaluating the eligibility of cultural resources for listing in the National Register.

Section 106 [16 USC § 470f] of NHPA establishes a review process that ensures the proper consideration of cultural resources during the planning stage of any federal agency activity. Federal agencies are required to consider the effects of their undertakings on any properties eligible for inclusion in or listed on the NRHP during the planning stages and to provide the Advisory Council for Historic Preservation (ACHP) an opportunity to comment. This process is detailed in implementing regulation 36 CFR § 800 (Protection of Historic Properties).

Section 110 of NHPA reinforces the responsibilities of the federal agency to establish a program to locate, inventory, evaluate, and preserve historic properties. Specifically:

- Each federal agency shall assume responsibility for the preservation of historic properties that they own or control. Prior to acquiring, constructing, or leasing buildings for purposes of carrying out agency responsibilities, each federal agency shall use, to the maximum extent feasible, the historic properties available to them.
- Each federal agency shall ensure that no potentially National Register-eligible historic property is inadvertently transferred, sold, demolished, substantially altered, or allowed to deteriorate significantly.

Table 1
Federal Laws, Regulations, Orders, and Procedures

Authority	Name
16 USC § 431 et seq. - P.L. 59-209 - 34 Stat. 225	Antiquities Act of 1906
43 CFR Part 3	Preservation of American Antiquities Implementing Regulations
16 USC § 470 et seq. - P.L. 89-665 80 - Stat. 913 Amended by P.L. 91-243, 93-54, 94-422, 94-458, 96-199, 96-244, 96-515, 98- 483, 99-514, 100-127, and 102-575	National Historic Preservation Act (NHPA) of 1966, amended through 1992
- 36 CFR Part 60 National Register of Historic Places - 36 CFR Part 61 Procedures for State, Tribal, and Local Government Historic Preservation Programs -36 CFR Part 63 Determinations of Eligibility - 36 CFR Part 67 Historic Preservation Certifications Pursuant to . . . the Internal Revenue Code of 1986, including the Secretary of Interior's Standards for Rehabilitation 36 CFR Part 68 Secretary of the Interior's Standards for the Treatment of Historic Properties - 48 FR § 44716-44740 Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines (9/29/1983) - 48 FR § 44716-44720 Standards for Preservation Planning - 48 FR § 44720-44723 Standards for Identification - 48 FR § 44723-44726 Standards for Evaluation - 48 FR § 44726-44728 Standards and Guidelines for Registration - 48 FR § 44728-44730 Standards for Historic Documentation - 48 FR § 44730-44734 Standards and Guidelines for Architectural and Engineering Documentation - 48 FR § 44734-44737 Standards and Guidelines for Archeological Documentation - 48 FR § 44737-44740 Standards and	NHPA Implementing Regulations and Guidelines

Guidelines for Historic Preservation Projects, including Professional Qualification Standards -36 CFR Part 78 Waiver of Federal Agency Responsibilities, under Section 110 of the National Historic Preservation Act -36 CFR Part 79 Curation of Federally Owned and Administered Archeological Collections - 36 CFR Part 800 Protection of Historic Properties	
42 USC § 4321 et seq. - P.L. 91-190 - 83 Stat. 852 et seq.	National Environmental Policy Act (NEPA) of 1969
40 CFR Part 1500-1508 Conducting Environmental Reviews	NEPA Implementing Regulations
25 USC § 3001 et seq. - P.L. 101-601 -104 Stat. 3048	Native American Graves Protection and Repatriation Act (NAGPRA) of 1990
43 CFR Part 10 Regulation Final Rule	NAGPRA Implementing Regulations
42 USC § 1996 - P.L. 95-341 - 92 Stat. 469	American Indian Religious Freedom Act (AIRFA) of 1978
16 USC § 461 et seq. - P.L. 74-292 - 49 Stat. 666	Historic Sites Act of 1935
36 CFR Part 65 National Historic Landmarks	Historic Sites Act Implementing Regulations
16 USC § 469-469c - P.L. 86-523 - 74 Stat. 220	Reservoir Salvage Act of 1960
16 USC § 469 et seq. - P.L. 93-291 -88 Stat. 174	Archaeological and Historical Preservation Act (AHPA) of 1974
16 USC § 460 et seq. - P.L. 94-422	Land and Water Conservation Act of 1976
20 USC § 2101 et seq. - P.L. 94-201 -89 Stat. 1129	American Folklife Preservation Act of 1976
42 USC § 12101 et seq. - P.L. 101-336 -104 Stat. 327	Americans with Disabilities Act (ADA) of 1990
	Executive Order 11593 Protection and Enhancement of Cultural Environment, 13 May 1971
	Executive Order 13007 Indian Sacred Sites, 24 May 1996
	Executive Order 13287 Preserve America, 3 March 2003

	Presidential Memorandum Distribution of Eagle Feathers for Native American Religious Purposes, 29 April 1994
	Presidential Memorandum Government-to-Government Relations with Native American Tribal Governments, 29 April 1994
Note abbreviations: USC—United States Code CFR—Code of Federal Regulations P.L.—Public Law FR—Federal Register Stat.—Statute	

Section 111 of NHPA complements the directives of Section 110 by addressing the responsibilities of a federal agency concerning adaptive use, lease, exchange, or management of federal historic properties. Army Regulation 200-1 also establishes installation responsibilities consistent with the requirements described above. Under Chapter 6 of AR 200-1, installation commanders must use historic properties to the maximum extent feasible prior to acquiring, constructing, or leasing buildings. AHPA specifically provides for the survey and recovery of historical and archaeological data that may be irreparably lost as a result of any alteration of the terrain from any federally licensed project, activity, or program. NEPA establishes that the federal government shall use all practicable means to preserve the productive harmony of the environment while fulfilling the social, economic, and other requirements of generations of Americans. Included in protecting the environment is the preservation of important historic and cultural aspects of our national heritage. The act requires all federal agencies to prepare a document, most commonly an environmental assessment (EA), which assesses the potential impacts of any proposed action on the environment. If impacts are judged potentially significant, an environmental impact statement (EIS) must be prepared.

The Antiquities Act and ARPA protect archaeological resources on federal lands from unauthorized excavation, removal, damage, alteration, or defacement of archaeological resources (as defined by ARPA) and objects of antiquity (as referenced in the Antiquities Act) on federally owned Army property without a permit. Violation of ARPA may result in the assessment of civil or criminal penalties and forfeiture of vehicles and equipment used in connection with the violation.

Legal mandates pertaining to Native American cultural resources and religious freedom include NHPA, NEPA, ARPA, NAGPRA, AIRFA, and EO 13007. Army regulations and guidelines (AR 200-1, DA PAM 200-4, and the Annotated Policy Document for the American Indian and Alaska Native Policy [27 October 1999]) recommend the establishment of an ongoing consultation relationship with Native Americans; designation of a Coordinator for Native American Affairs; and incorporation of consultation procedures into existing Army planning and procedural documents.

Additional laws, regulations, directives, and Executive Orders that apply to the West Point cultural resources program are outlined above in Table 1. The full texts of legislation listed in Table 1 are available from the National Park Service (NPS) web site (<http://www.cr.nps.gov/linklaws.htm>). Appendix B also contains brief summaries or principal legislation and includes a discussion of NEPA and its overlapping authorities with NHPA.

Professional Qualifications for CRM. Chapter 6, AR 200-1 stipulates that the Superintendent (or Garrison Commander as the Superintendent's designee) must designate a qualified installation "Cultural Resource Manager" to coordinate the installation's cultural resources management program. The West Point CRM shall meet the Secretary of the Interior's professional qualifications standards for Historian, Archaeologist Architectural Historian, Architect, or Historic Architect as outlined in the Federal Register, Volume 62, No. 119, pp. 33708-33723 and 36 CFR 61 (reprinted at the end of Appendix H of this ICRMP). The CRM must possess the appropriate knowledge, skills, and professional training and education to carry out program responsibilities, as required by Army Regulation 200-1.

In addition to the professional standards, the CRM should also:

- Possess five (5) years documented experience working in the field of Cultural Resources Management. This experience shall include coordinating Section 106 Consultation, the development of comprehensive agreements (MOA's, PA's, etc.), and Section 110 Compliance;
- Possess documented experience in coordinating consultation with Federally Recognized Native American Tribes;
- Possess two (2) years of documented experience working with and applying the Secretary of the Interior's Standards for the Treatment of Historic Properties. This shall include in-depth knowledge of historic building materials and the proper treatments for their long term preservation;
- Possess extensive knowledge and understanding of one or more of the following: (1) American History; (2) U.S. Military History; (3) U.S. Army History or (4) the History of West Point. This knowledge shall be demonstrated through education, experience, or scholarly contributions; and
- Possess prior experience managing a large and diverse collection of historic architectural resources.

The following qualifications are also desirable in the CRM, although not compulsory:

- Prior experience working on an Army, Military or Federal installations; and
- Experience with the use of GIS in the management of Cultural Resources.

If the CRM fails to meet the qualification requirements described above for his or her respective discipline, West Point will not be in compliance with a major stipulation of the proposed ICRMP PA. This stipulation is in place to allow West Point to exclude a number of routine activities related to the management and preservation of historic buildings, structures, and other properties from further Section 106 coordination. Should West Point not employ a full-time, qualified CRM, the standard Section 106 consultation requirements for all undertakings at West Point will apply.

Because of the size and extent of architectural resources within the West Point NHL, the West Point cultural resources program should also include at least one professional who shall meet the National Park Services professional qualifications standards for Architectural History, Historic Architecture or Historic Preservation, whose primary responsibility should be to manage the primarily architectural resources within the NHL. A qualified archaeologist should also be an integral member of the West Point cultural resources program, with primary responsibilities for managing the archaeological resources of the West Point range areas. These individuals shall assist the CRM in the day-to-day management of West Point's cultural resources, including the identification, evaluation, and protection of historic properties, in compliance with all applicable legal requirements





Chapter Three

West Point Cultural Resources Management Program

Organization. Currently, the Cultural Resources Management program is a component of the Installation Branch of the Engineering, Plans, and Services Division of the Directorate of Public Works (DPW). The management program staff includes the Cultural Resource Manager, who is a professional in the field of architectural history.

Cultural Resources Management Program History. In 1995, the first full-time, dedicated Cultural Resource Manager was hired at West Point. Since that time, the facility has maintained this position. Additional staffs of interns, contract employees, cultural resources contractors, and other government agencies have provided support and expertise to meet West Point's growing needs. Prior to 1995, West Point received its cultural resources support and expertise from external sources such as the National Park Service, the U.S. Army Corps of Engineers, academic institutions, and government contractors.

The first studies of West Point's historic resources began in the late nineteenth century when the New York Historical Society's Field Exploration Committee conducted archaeological investigations there. Numerous academic and avocational studies followed, focusing largely on the facility's Revolutionary War archaeological resources.

In December 1960, West Point's core of historic buildings and archaeological sites was officially recognized by the National Park Service subsequent to West Point's listing as a National Historic Landmark (NHL) under the authority of the Historic Sites Act of 1935.

In October 1966, following the authorization of 36 CFR § 60 and the creation of the National Register of Historic Places, West Point was officially listed as a National Register Historic District by the NPS.

In 1989 the program was guided by the Historic Resource Management Plan (HRMP), United States Military Academy, prepared by John Cullinane Associates and the U.S. Army Construction Engineering Research Laboratory. This document was developed to assist West Point with the management and preservation of historical resources that might be impacted through various projects. The HRMP included (1) a probability model of archaeological resources locations within West Point; (2) made recommendations concerning field survey activities such as sampling technique, excavation, data recording, and laboratory analysis; and (3) compiled information concerning the historic buildings and structures, including floor plans and drawings, and histories of those resources.

The 1989 HRMP development, combined with the need to conduct intensive archaeological surveys in advance of construction of the Stony Lonesome Housing area, led to the first systematic archaeological surveys of West Point property using modern methodologies in 1990–1991.

In 1995, West Point hired its first CRM and adopted the United States Military Academy Cultural Resource Management Plan (CRMP) prepared by the State University of New York (SUNY) at Albany. This document was intended for the management of archaeological resources at West Point and provided (1) an outline of procedures to be followed to ensure detection of archaeological resources on West Point property and to proper mitigation of any impact by future activities on those resources; (2) guidance on the preservation of historic sites and the museum curation of recovered artifacts, both previously discovered and potential new discoveries; and (3) a background archaeological context that summarized the regional archaeology and previous archaeological research projects at West Point. The 1995 CRMP was based on a computer-generated predictive model for the identification of areas potentially sensitive for archaeological resources and included a set of large-scale maps on which the predictive model had been based.

Between 1995 and 2000, the Cultural Resources Management program focused heavily on NHPA compliance activities with Section 106 coordination for major projects as well as some Section 110 related surveys and National Register evaluation efforts. The majority of these studies were conducted by cultural resources contractors, with archaeologists from the United States Army Corps of Engineers, New York District, assisting the West Point Cultural Resource Manager with supervision and review.



West Point National Historic Landmark Boundaries, as established in 1960

In 2001, two important documents were developed, the West Point ICRMP and the West Point Historic Landscape Management Plan (HLMP). The ICRMP, prepared by Geo-Marine, Inc., for the USACE, New York District, was the first of West Point's management plans to be developed under the revised AR 200-4 and to provide guidance on the protection and preservation of the full range of West Point historic properties. A draft PA accompanied the ICRMP. This PA was finalized in 2003 and implemented several of the ICRMP SOPs and listed routine activities not requiring further Section 106 coordination. The second document, the HLMP, was part of a historic landscape documentation project undertaken at West Point by USACERL. The ERDC-CERL work included a survey (prepared in a separate document), development of a historic context (Historic Overview section of the HLMP), and recommendations for maintenance and management of West Point's historic landscapes (Historic Landscape Recommendations section of the HLMP). The Historic Overview divided West Point's development into six temporal periods; these temporal divisions have been adopted by subsequent studies. The Historic Landscape Recommendations provided a brief history of each landscape element, an assessment of its integrity, treatment options, and recommendations for future management.

Beginning in 2002, the West Point DPW also began to establish and employ a Geographic Information System (GIS) capability, which included dedicated cultural resources layers.

Between 2002 and April 2006, the Cultural Resources Management Office developed numerous SOPs for historic building maintenance and repair as well as inadvertent discoveries; conducted training sessions; promoted a community- and command-wide sense of stewardship; and improved compliance activities related to Section 106, Section 110, 36 CFR 79, and ARPA. These initiatives are discussed in greater detail in Section 1.4.4.

Review, Use and Applicability of Previous ICRMP. The previous ICRMP prepared in 2001 by Geo-Marine was for fiscal years 2001–2006; which was significantly updated and revised by Geo-Marine in 2007. Unfortunately, because of the turbulence experienced by the Cultural Resources Management program, consultation with the New York SHPO for the 2007 updated ICRMP was never completed, and the Programmatic Agreement implementing it was not entered into by either West Point or the New York SHPO.

Both the 2001 and 2007 ICRMPs were designed to serve as a component of the West Point Master Plan, to complement other facility plans such as an INRMP, and to comply with the Army's guidance (DA PAM 200-4) for the development of ICRMPs. Two major sections of the document—the Cultural Resources Inventory (this section outlined past cultural resources studies and described the facility historic property inventory in 2001) and the Management Plan (this section detailed activities listed in the West Point Master Plan and the possible impacts associated with those activities)—were developed using time sensitive documents and information. Consequently, these sections of the 2001 ICRMP are dated and require revision. Other sections, such as the introduction and historic context, require minor revisions to reflect changes in facility needs or to update information. Army guidance directs that the ICRMP should be updated every five years; thus, this current document has been developed for fiscal years 2011-2016 and incorporates new data, procedures, goals and objectives, and internal management guidelines. These include improvements associated with Section 106 coordination and Section 110 compliance activities (discussed in the following section, 1.4.4).

Superintendent /Garrison Commander Roles and Responsibilities. Under Chapter 6 of AR 200-1, the Superintendent, as the academy's installation commander, is responsible for compliance with federal laws that pertain to cultural resources. The West Point Superintendent has delegated this authority to the West Point Garrison Commander. The West Point Garrison Commander serves as the signatory for documents, such as the ICRMP, facility PAs, and MOAs, that require the Superintendent's signature. AR 200-1 directs the Superintendent to:

- Designate a qualified installation CRM to coordinate the installation's cultural resources management program;
- Establish a process that requires staff elements, tenants, and other appropriate parties to coordinate with the CRM early in the planning stages of a project to determine if any cultural resources are present and if project activities have the potential to directly or indirectly impact cultural resources;
- Prepare and implement a facility-wide PA that addresses and streamlines compliance with NHPA;
- Ensure that cultural resources management is coordinated with other facility activities such as training and testing, master planning, environmental impact analysis, natural resources and endangered species management planning (this includes INRMPs), and facilities and housing;
- Establish funding priorities and program funds for cultural resources compliance into the Environmental Program Requirements report;
- Serve as the "Federal Agency Official" responsible for installation compliance with NHPA (as defined in 36 CFR § 800); and
- Establish government-to-government relationships with federally recognized Native American tribes and designating a coordinator for Native American affairs if significant Native American issues exist.

AR 200-1 stipulates that the Superintendent (or Garrison Commander as the Superintendent's designee) is responsible for ensuring that the CRM has appropriate knowledge, skills, and professional training and education to carry out installation cultural resources management responsibilities. The commander must also make certain that all cultural resources technical work (including but not limited to identification, evaluation, and treatment of historic properties, and preparation and implementation of an ICRMP), is conducted by individuals who meet the applicable professional qualifications standards established by the NPS in 36 CFR 61, Appendix A.

CRM Roles and Responsibilities. Under Chapter 6, AR 200-1, the Superintendent must designate a Cultural Resource Manager to coordinate the facility's CRM program. The CRM provides day-to-day management for cultural resources, ensures that all installation activities are in compliance with applicable cultural resources requirements, serves as coordinator of cultural resources management activities with organizational elements and tenant organizations, and oversees implementation of the ICRMP. Meeting these responsibilities involves:

- Coordinate Section 106 project review for all facility undertakings, including determining if historic properties would be affected by proposed undertakings in consultation with the New York State Historic Preservation Office (SHPO);
- Serve as the Garrison Commander's designee for compliance with all applicable Cultural Resources laws and requirements;
- Notify the Garrison Commander, through DPW Management, when activities on post do not comply with all applicable laws and requirements in regard to Cultural Resources;
- Coordinate all correspondence with the SHPO;

- Develop and maintain files that document completion of the Section 106 review process or consultation process (including maps, plans, notes, data forms, photographs, memoranda, journal notes, draft and final reports, letters of concurrence/nonconcurrence, PAs, MOAs, and CAs);
- Insure that project managers or project proponents receive copies of Section 106 related correspondence from the SHPO (when appropriate);
- Determine if undertakings are covered under current Programmatic Agreements (PA's);
- Coordinate all Native American and/or public consultation pursuant to compliance with applicable laws or regulations (such as NHPA, NAGPRA, and AIRFA) or the public involvement plan section of this ICRMP;
- Conduct and/or reviewing studies prepared as part of facility's compliance with federal preservation legislation;
- Determine the National Register of Historic Places eligibility of cultural resources in consultation with the SHPO.
- Serve as the point of contact for the SHPO, ACHP, and Native American tribes;
- Participate in the development of MOAs, PAs, and CAs;
- Oversee the proper curation of artifacts recovered from West Point in accordance with 36 CFR § 79;
- Assist ARPA permit applicants;
- Implement a proactive plan to preserve and protect all known archaeological sites (per compliance with ARPA);
- Periodically monitor the condition of known archaeological sites for evidence of vandalism;
- Assist the Superintendent with developing funding priorities for all cultural resources program and compliance activities;
- Develop budget requirements for compliance with this ICRMP and applicable PAs and/or MOAs, using the A-106 budgeting process to program these requirements through Army channels; and
- Manage and update the Cultural Resources GIS layer for West Point.

The Cultural Resource Manager must have the appropriate educational background, skills, and professional training to carry out these program responsibilities.

Other Directorate of Public Works Staff Roles and Responsibilities. Other departments within DPW are participants in managing cultural resources:

- Master Planner—should have the ICRMP as a component plan within the Master Plan and IDG;
- Project Engineers—should include time schedules for cultural resources consultation and NEPA compliance in their project design and delivery schedules;
- DPW Maintenance Shops—both the shops and work order section should have a current inventory of cultural resources and should use the appropriate standards and techniques established for maintenance and repair of historic properties;
- Utilities—should have a permitting system established for any excavation dig on the installation. The CRM should review all plans for digging;
- Resource Management Office—responsible for tracking any cultural resources funds, and serves as an information source concerning funding; and
- Contracting Office—should provide advice on expenditure of funds to accomplish cultural resources program. The Contract Office should be made aware of legal requirements or agreements concerning cultural resources so that contracts are consistent with those requirements.

Staff Judge Advocate Roles and Responsibilities. The Staff Judge Advocate is not part of DPW but is an integral part of the cultural resources management compliance program. The Staff Judge Advocate's role includes:

- Review MOAs, PAs, CAs, EAs, EISs, and any other legally binding cultural resources documents for legal sufficiency;
- Interpretation of laws and regulations related to cultural resources management; and
- Interpretation of Native American Consultation Requirements.

External Coordination Process and Consulting Parties

New York State Historic Preservation Officer. Under NHPA, the SHPO is the state-level coordinator of historic preservation activities and is responsible for consulting with federal agencies during Section 106 review. During the Section 106 process, the New York SHPO will assist West Point with the determination of NRHP eligibility of properties affected by undertakings and the application of the Criteria of Adverse Effect. If the New York SHPO and West Point are not able to reach an agreement during the Section 106 process, then West Point may work directly with the ACHP (see below).

Implementation of the ICRMP and its associated PA (Appendix H) will streamline consultation with the SHPO and eliminate the need for consultation for certain routine actions. For projects that are anticipated to require ongoing coordination and are not excluded under the ICRMP PA, it is recommended that the New York SHPO and the West Point CRM outline and commit to a schedule and means of dialog early in the coordination process to ensure full and timely Section 106 compliance.

Advisory Council on Historic Preservation. The ACHP is a 20-member advisory body established by NHPA that may review and comment on the Section 106 review process and issue notices of noncompliance. Under criteria outlined in 36 CFR § 800-Appendix A, the ACHP is likely to enter the Section 106 process at the steps specified in the regulations when an undertaking:

- Involves a disagreement between the SHPO and the agency;
- Has substantial impacts on important National Register of Historic Places eligible (historic) properties;
- Presents important questions of policy or interpretation;
- Has the potential for presenting procedural problems;
- Impacts the NHL; or
- Presents issues of concern to Native American tribes.

National Park Service. The NPS has no specific role as dictated by the regulations during the Section 106 review of NRHP-eligible properties. However, when the review process involves an NHL, the NPS has a more active role. NPS must be invited, as the representative of the Secretary of the Interior, to participate as a consulting party when it is determined that an undertaking will have an adverse effect on an NHL [36 CFR § 800.10(c)].

Interested Parties. West Point shall consult with local historic societies and preservation groups, the city of Highland Falls, and Orange and Putnam county governments (and others when West Point or the SHPO believe consultation is warranted) on issues regarding properties that are eligible or may be eligible for listing in the NRHP. Currently, these parties include the Constitution Island Association; Hudson River Valley Greenway; Scenic Hudson, Inc.; National Trust for Historic Preservation; Orange County Historical Society; Preservation League of New York State; Putnam County Historical Society; Hudson Highlands

Land Trust; and Hudson River Keeper. The Army is the final decision maker regarding who to include, except where specifically designated in 36 CFR § 800.2(c).

Native American tribes (such as the Saint Regis Mohawk Tribe and Stockbridge-Munsee Band of Mohican Indians) invited to participate in Section 106 consultation must be consulted according to Presidential Memorandum, Government-to-Government Relations with Native American Tribal Governments, dated 29 April 1994. Army regulation 200-1 also requires the USMA Superintendent to establish government-to-government relationships with federally recognized Native American tribes and specifies that the Superintendent shall designate a coordinator for Native American affairs if significant Native American issues exist. For those undertakings where issues of interest to Native American tribes are present, individual coordination and consultation are required in accordance with the MOU between West Point and Stockbridge-Munsee Band of Mohican Indians, and are suggested for any other tribal governments or entities that might be identified.

All participants provided consulting party status are to be provided the ability to review all correspondence and reports, comment on agency determinations, and can be invited to be signatories to resolution-of-effect documents such as negotiated MOAs and PAs.

As noted earlier, public involvement, as part of the completion of NEPA and NHPA studies and documentation, is a well-developed process and has been demonstrated as a suitable approach for seeking public input in federally planned or supported projects. Public involvement is an integral and important component of NHPA consultation, that should be evaluated and considered for all NHPA undertakings.

Program Components. This section presents procedural guidelines for meeting cultural resources management responsibilities at West Point. A plan to assist West Point's Cultural Resources Management program in supporting mission requirements over the five-year period of the ICRMP is outlined. Incorporated into the five-year plan is a discussion of policies, procedures, and key objectives for each of the seven program components, which consist of the following: Section 106 Compliance, Section 110 Compliance, Archaeological Resources Management, Artifact Curation (36 CFR § 79 compliance), Native American Consultation, Historic Architecture Management, and Visual and Aesthetic Considerations. Included within the Section 106 program component is a discussion of the roles and responsibilities of West Point staff, external coordination and consultation procedures, Section 106 schedule considerations, and actions exempted from further Section 106 coordination. A listing of new and currently implemented SOPs is also provided.

There are eight components to the West Point cultural resources program:

- Section 106 Compliance;
- Section 110 Compliance;
- Archaeological Resources Management;
- Artifact Curation (36 CFR § 79 Compliance);
- Native American Consultation;
- Architectural Resources Management;
- Aesthetic Resources; and
- Historic Research and Studies.

The following text describes component-related activities and initiatives undertaken within the last five years. For a discussion of future activities and initiatives related to these components, see Chapter 4 of this ICRMP.

“...the years of heritage that is now passed on to you by the ‘Long Gray Line.’ Remember the beauty and strength of this place and let it always be an inspiration to you. Remember the solid, gray granite of these walls and how these stones have stood against countless seasons, a symbol of America’s strength around the crucible of her military leadership.”

-General Colin L. Powell, Commencement Speech at West Point, May 31, 1990



Section 106 Compliance. Section 106 [16 USC § 470f] of the NHPA ensures that cultural resources are properly considered in the planning stage of any federal agency activity. Under this law, West Point is required to consider the effects of undertakings on any properties eligible for inclusion in or listed on the NRHP during the planning stage and to provide the ACHP an opportunity to comment. At West Point, the Section 106 process is integrated with the NEPA review process when possible. Specifically, project review, project impact studies (EAs and EISs), as well as external coordination and consultation (i.e., SHPO, interested public, and NPS, and ACHP when required) and other activities related to NEPA and Section

106 compliance are coordinated simultaneously to reduce review time and costs. This approach has proven effective and beneficial.

Since 2002, the program's Section 106 coordination increased as more activities were managed to ensure an optimal level of compliance with federal legislation. At the same time, a number of routine activities determined not to have an effect on the facility's historic properties under the 2003 PA proceeded without the need for further external coordination. Numerous new procedures, cultural resources training sessions, and programs have been instituted and include the following:

- Specific consideration of potential impacts to historic properties as early as the inception and siting phase of major construction projects and building rehabilitation efforts. This has contributed to a significant reduction in "adverse effect" determinations;
- Historic preservation concerns integrated into scopes of work, design drawings, and specifications;
- Proactive Section 110 program that reduces the Section 106 burden by expanding the base of knowledge of facility cultural resources and their significance;
- Strong and positive working relationship with the SHPO;
- Involvement in the full range of maintenance and construction activities and CRM participation in Work Management Board Meetings;
- Adoption of multiple SOPs. These include SOPs for the inspection and maintenance of various types of historic fabric; salvage procedures for historic building fabric from construction and demolition projects; protection of building fabric from construction and demolition; emergency response procedures (protecting historic artifacts and fabric, associated or historical documents, etc. prior to or immediately after an emergency); and inadvertent discovery procedures;
- Training craftsmen, carpenters, and other tradesmen in salvage, repair, and restoration of historic fabric;
- Adoption of the PA associated with the 2001 ICRMP and planned revision of the PA (with the adoption of this 2012-2016 ICRMP) to reduce coordination for routine activities conducted in compliance with Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines (48 FR 44716-44740), NPS bulletins or guidance documents, accepted SOPs, or where no historic features will be impacted;
- Utilization of standardized designs for facility infrastructure such as security devices, bollards, and lighting that is consistent with post aesthetics and sensitive to the historic character of the NHLD;
- Continued monitoring of construction projects, even after Section 106 coordination has occurred, to ensure that all SHPO stipulations are met and that no changes are made during construction that require additional coordination;
- Establishment of a salvage program and sample collection of historic materials;
- Promoting stewardship and conducting regular cultural resources training for West Point staff including, most importantly, DPW project managers, master planners, building commandants, Integrated Training Area Management, and other range staff;
- Utilization of new technologies, such as computer-generated models, to create graphic simulations to ascertain potential visual impacts of new construction within sensitive areas of West Point; and
- Utilization of GIS to locate and identify cultural resources at West Point prior to a planned activity.

Since 2001, West Point has been in compliance with Section 106 of the NHPA; and has performed regular and routine consultation with the New York SHPO.

As the Garrison Commander's designee, the CRM provides the day-to-day management of cultural resources, ensures that all installation activities are in compliance with applicable cultural resources requirements, oversees implementation of the ICRMP, consults with the New York SHPO (when required),

and serves as coordinator of cultural resources management activities with organizational elements and tenant organizations. The latter is accomplished by an internal project review process described below.

The CRM, in the Master Planning division of the DPW, reviews all projects submitted through work requests (DD Form 4283) and alumni-generated gift projects to ensure that all installation activities are in compliance with applicable cultural resources requirements. The CRM and other staff responsible for assisting the CRM with review apply the NEPA process when possible as a means of coordinating compliance activities. This includes consideration of project alternatives and coordination with outside parties such as review authorities, interested agencies, organizations, and the public. PAs are typically used to create agreements among West Point, review authorities (the SHPO and ACHP), and interested parties for major projects such as new construction, particularly in the NHLD. Other projects, not excluded under the ICRMP PA (Appendix H), are coordinated on a case-by-case basis through correspondence with the SHPO. The CRM is responsible for all correspondence with SHPO and maintaining correspondence records. The CRM is generally the signatory of such correspondence. Exceptions include agreement documents (such as PA, MOAs, etc.).

Job order contracts (JOCs), major construction projects, estimating, and projects from other directorates are reviewed through environmental/cultural resources checklists designed to provide the CRM and other environmental staff with the information necessary to determine if resources may be impacted by the proposed activity (Appendix F). These checklists include the Environmental Preview Sheet (for JOC and estimate use), the Environmental Checklist (for use by other directorates), and the Submittal Package Checklist (required during the conceptual phase of major construction projects). If a project is determined to not qualify as a categorical exclusion, a Project Environmental Checklist is completed. This form includes fields for both cultural resources and visual/aesthetic consideration and is used to aid in the determination of environmental documentation, such as EAs, EISs, and Records of Environmental Consideration, that may be required. It should be noted that if a project on post does not comply with all applicable cultural resources laws and requirements, the CRM is obligated to notify the Garrison Commander, through DPW Management.

Section 106 Program. As noted in Section 1.4.4.1, the NHPA is the principal authority used to protect historic properties. Under this law, West Point must determine the effect of its actions on cultural resources and take certain steps to ensure that these resources are located, identified, evaluated, and protected. Section 106 [16 U.S.C. 470f] of the NHPA establishes a review process that ensures that cultural resources are properly considered in the planning stage of any Federal agency activity. West Point is required to consider the effects of its undertakings on any properties eligible for inclusion, or listed, on the NRHP during the planning stage and to provide the ACHP an opportunity to comment. This process is detailed in implementing regulation 36 CFR Part 800 (Protection of Historic Properties). Discussion of West Point's five-year plan for its Section 106 compliance program is outlined below.

West Point shall ensure that military and civilian undertakings within the academy, or where it is a proponent, will be assessed for impacts on known historic properties and the likelihood of identifying unknown NRHP potentially eligible and eligible resources. To avoid project delays, the West Point CRM must review all projects as early in the planning stages as possible. For rehabilitation and new construction projects, this equates to the concept design stage. CRM review is also required at the 35 percent, 65 percent, 100 percent project design levels, and when project designs are altered after the 100 percent design phase. For all other major projects or activities conducted within the NHLD, CRM review must occur at the concept or scoping phase.

West Point shall use the process and documentation required for an EA/FONSI or an EIS/ROD (record of decision) to comply with Section 106 [36 CFR § 800.8(c)] whenever an undertaking requires that the NEPA

process be conducted. If the NEPA process is not necessary, West Point will comply with Section 106 through the implementation of the appropriate SOP or case-by-case compliance.

Any project that has the potential to effect NRHP-eligible or -listed properties (designated as contributing elements of the NHL or as individually eligible properties), NOT covered under the list of excluded activities outlined in the PA (Appendix H), will be coordinated for review and comment with the NY SHPO. If the NHL is affected, West Point will also coordinate for review and comment with NPS. Project documentation will be forwarded to the ACHP for review and comment when:

- Issues cannot be resolved between the principal parties involved;
- there is no agreement between the SHPO and the Army as to the nature of the effect;
- the project impacts the NHL;
- the project presents issues of concern to Native American tribes; or
- the project presents important questions of policy or interpretation.

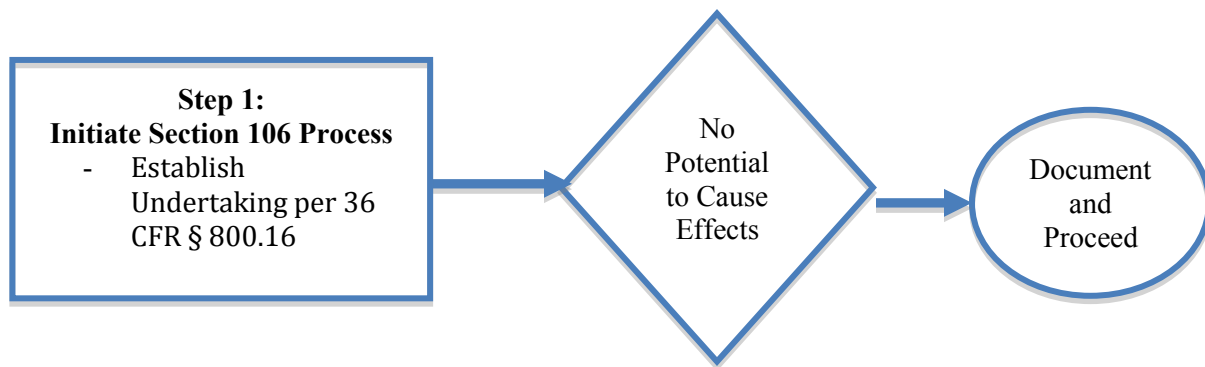
If changes are made to project plans after SHPO review and concurrence, additional coordination is required.

West Point shall adopt a revised programmatic agreement for the implementation of this ICRMP (see Appendix H). The 2011 ICRMP PA shall establish policies for the protection of historic properties at West Point and outline activities that are excluded from further Section 106 consideration. West Point shall also maintain qualified staffing during the five-year period of the ICRMP. Staffing requirements must be fulfilled in order to ensure successful implementation of both the PA and ICRMP and compliance with Chapter 6, AR 200-1.

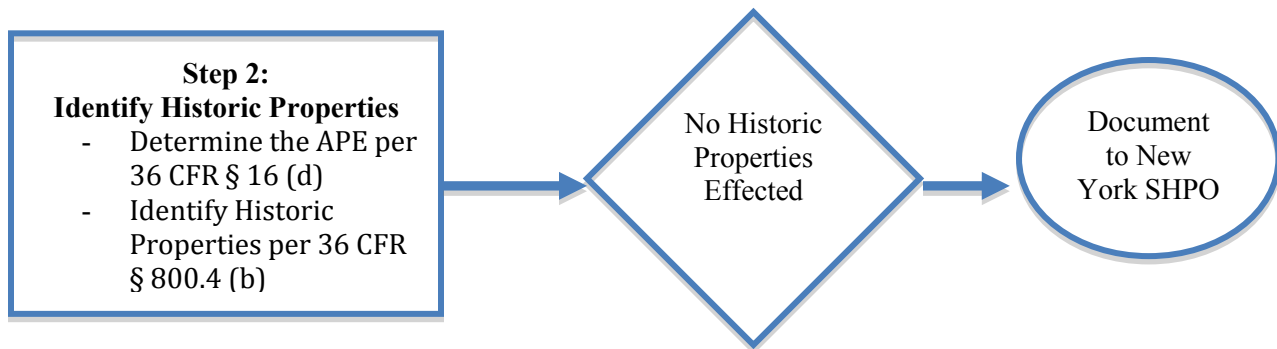
Effects to Historic Properties. Historic properties are impacted by project activities that result in:

- physical destruction of or damage to all or part of the property;
- alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material reduction, and provision of handicapped access, that is not consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR § 68) and applicable guidelines;
- removal of the property from its historic location;
- change of the character of the property's use or physical features within the property's setting that contributes to its historic significance;
- introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features;
- neglect of a property that causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- transfer, lease, or sale of property out of federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

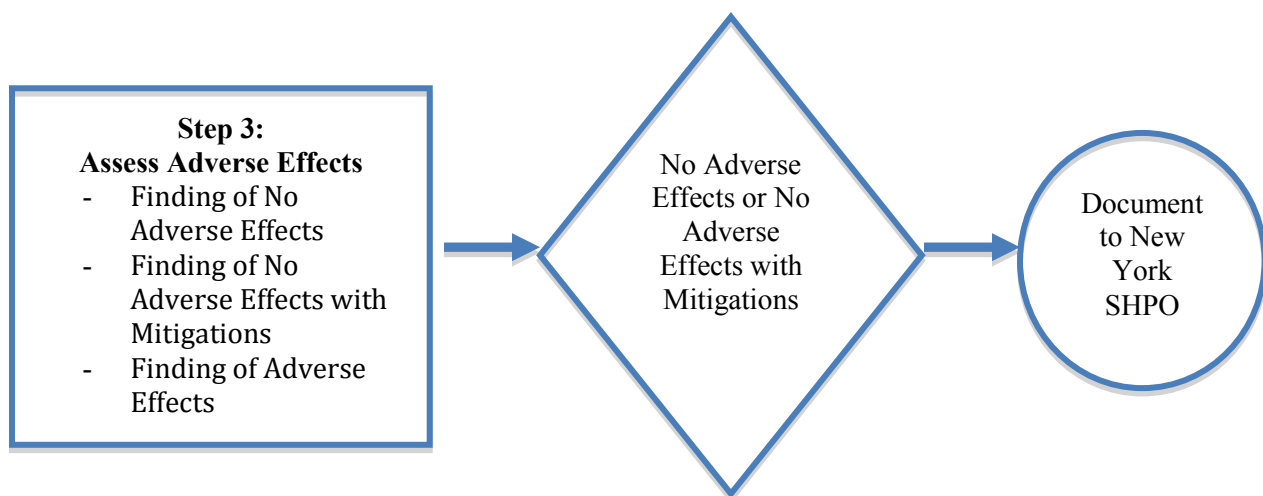
Section 106 Process. The following outlines the basic Section 106 process. Regulation time cycles are noted in the following text to provide project and program managers with an understanding of time requirements.



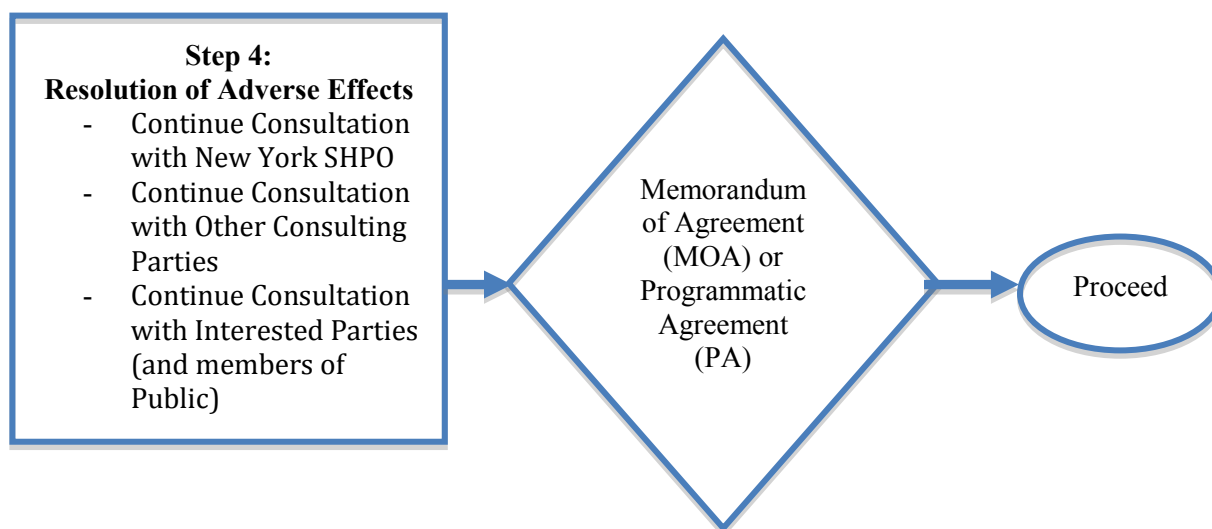
Step One: If the undertaking has no potential to cause effects as defined by 36 CFR § 800.3 (2), then the decision should be documented, recorded on the Annual Report to the New York SHPO, and the undertaking can proceed. If there are no effects to historic properties, or there is no undertaking, schedule impacts are minimal.



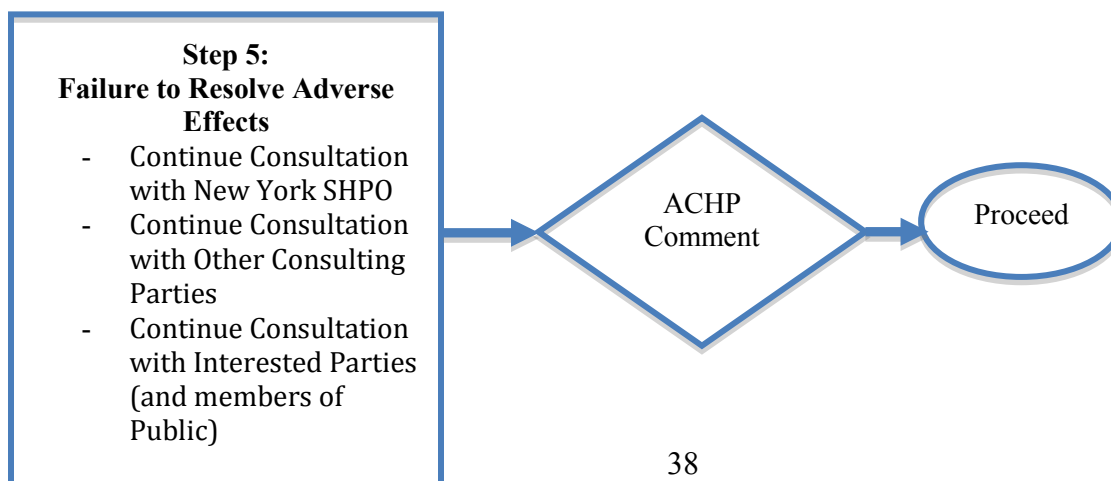
Step Two: Within 30 days: If historic properties are present and will not be affected per 36 CFR § 800.16 (i), the New York SHPO has 30 days from receipt of information to agree, disagree, or not respond. If the New York SHPO does not respond, proceed. The New York SHPO may request additional information and, upon receipt of supplemental information, will have another 30-day review period. Other consulting parties should be allotted this 30-day review period for comment. All correspondences to consulting parties should note this timeframe for response.



Step Three: In accordance with 36 CFR § 800.5 (a) (2), determine if the effects of the undertaking will have no adverse effects, will have adverse effects that can be mitigated to no adverse effects, or will have adverse effects. If the CRM and the New York SHPO agree that there will be no adverse effect, proceed with the undertaking and any agreed upon conditions. This can be achieved within the original 30-day time described in Step 2 if all necessary information is presented to the New York SHPO and agreed upon at that time. It is more likely, however, that such a finding will be the result of a series of discussions requiring changes to the proposed project to avoid impacts. Consequently, project managers should anticipate a minimum of 60 days when historic properties may be affected. If an adverse effect determination is made (i.e., undertaking will cause some or many changes to historic property/ies) and cannot be avoided, go to Step 4.



Step Four: Unspecified timeframe: Resolution of adverse effects through consultation among the Army, the New York SHPO, the ACHP if they decide to participate, the National Park Service if the NHL is involved and they decide to participate, and any interested parties can be very time consuming. There is no associated time limit for Council review of agreement documents. Typically, consultation results in an MOA or PA that specifies actions that mitigate the adverse effects to historic properties. Mitigation required by an MOA or PA may be time consuming and NEPA compliance timelines should also be considered. The execution of the MOA or PA evidences West Point's compliance with Section 106.



Step 5: In the rare cases where West Point and the New York SHPO fail to agree regarding the resolution of adverse effects in accordance with 36 CFR § 800.6, the Garrison Commander or other major Army official requests ACHP comment. The ACHP shall transmit its comments within 45 days of receipt of the request for comment. If the Army terminates consultation, it shall notify the other consulting parties and provide written reasons for termination. All consulting parties and the public may provide their views within the 45-day ACHP comment time period. Following receipt of comments, the Garrison Commander or other major Army official must review the comments and prepare a summary of the decision that contains the rationale for the decision and evidence of consideration of the ACHP comments, and provide it to the ACHP and consulting parties prior to approval of the undertaking. Such an eventuality will result in significant and lengthy schedule impacts. Following the release of the summary, the Section 106 process is complete.

USAGWP Undertakings Not Requiring Coordination with the New York SHPO under the Proposed 2011 Operations and Maintenance PA. The following are activities exempted from coordination. These include actions where: (1) it has been confirmed that no historic properties exist or (2) actions will not affect historic properties. All exempt activities (except those in which no historic properties are present) must be monitored and documented by the CRM and included in an annual report, to be submitted at the end of the calendar year, to the New York SHPO. A template for the Annual Report is provided at the end of this section.

Exemptions Related to the Built Environment:

- Work that is undertaken in accordance with the Secretary of the Interior's Standards for Preservation & Guidelines for Preserving Historic Buildings;
- Repair of existing elements that are not visible or that do not contribute to the historic or architectural significance of property (including changes to non-historic spaces within historic buildings).
- Routine maintenance of historic interior spaces within historic buildings, as long as maintenance activities follow the Secretary of the Interior's Standards for Preservation & Guidelines for Preserving Historic Buildings and applicable NPS Preservation Briefs. This includes replacement in-kind and refinishing in-kind.
- Energy conservation measures that are not visible or do not alter or detract from the qualities that make the property eligible.
- Interior alterations and maintenance of non-historic buildings within the NHL.
- Exterior maintenance of non-historic buildings within the NHL, including replacement of roofing and other features, as long as replacement is in-kind (i.e., same roof material, color, profile, etc.) and the original/replacement element is not obtrusive in the NHL.
- Routine repair and maintenance of historic slate roofs as long as work is in accordance with West Point CR SOP No.1: Slate Roof Inspection and Repairs; the Secretary of the Interior's Standards for Preservation & Guidelines for Preserving Historic Buildings; and "Preservation Brief 29: The Repair, Replacement & Maintenance of Historic Slate Roofs."
- Routine repair and maintenance of historic wood roofs as long as work is in accordance with West Point CR SOP No. 2: Wood Roof Inspection and Repairs; the Secretary of the Interior's Standards

for Preservation & Guidelines for Preserving Historic Buildings; and “Preservation Brief 19: The Repair and Replacement of Historic Wooden Shingle Roofs.”

- Routine repair and maintenance of mortar/masonry so long as work is in accordance with West Point CR SOP No. 4: Masonry Repointing and Repairs; the Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings; and “Preservation Brief 2: Repointing Mortar Joints in Historic Masonry Buildings.”
- Routine repair, maintenance and replacement of historic wooden doors so long as work is in accordance with West Point CR SOP No. 5: Wood Door Inspection and Repairs and the Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings. Historic doors shall not be removed from the U.S. Army Garrison at West Point.
- Routine repair and maintenance of ornamental metal & hardware as long as it is in accordance with West Point CR SOP No. 6: Ornamental Metal/Hardware Inspection and Repair Procedures and the Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings.
- Interior painting of historic buildings so long as work is undertaken in accordance with West Point CR SOP No. 7: Interior Paint Inspection and Repainting Procedures; the Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings; and “Preservation Brief 28: Painting Historic Interiors.”
- Routine repair and maintenance of historic plaster walls so long as work is in accordance with West Point CR SOP No. 8: Plaster Walls and Ceilings Inspection and Repair Procedures; Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings, and “Preservation Brief 21: Repairing Historic Flat Plaster Walls and Ceilings.”
- Exterior painting of historic buildings so long as work is undertaken in accordance with West Point CR SOP No. 9: Exterior Paint Inspection and Repainting Procedures and the Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings.
- Routine repair and maintenance of historic wood windows so long as work is in accordance with West Point CR Wood Window SOP: Maintenance and Repair of Wood-Framed Windows; the Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings; “Preservation Brief 9: The Repair of Historic Wooden Windows.” and A Guide for Historic Window Repair and Replacement.
- Upgrade, repair or replacement of existing fire suppression/detection equipment in historic buildings so long as: (1) existing chases are used; (2) no new wall penetrations are required; and (3) when not required by federal law or fire code, pipes and conduits painted so that their visual effect is minimized (i.e. painted to match existing walls or masonry).
- Removal or abatement of lead-based paint or asbestos so long as no historic fabric is affected by the removal and all work is conducted in accordance with applicable local, state & Federal regulations.
- Replacement of antiquated mechanical equipment (including hot water heaters, boilers, etc.) in historic building(s) when the equipment is not visible in public spaces. Equipment that is visible (such as radiators, registers, elevators, etc) must be retained. The conversion of heating system from steam to hot water does not require review by the NY SHPO so long as features such as radiators are retained.
- “Mothballing” or long-term stabilization of historic buildings/structures not in use if conducted in accordance with procedures in the “Preservation Brief 31: Mothballing Historic Buildings.”
- Cleaning activities, such as the removal of debris, surface grime, or mold to facilitate investigation or maintenance, as long as cleaning is conducted according to the Secretary of the Interior’s Standards for Preservation & Guidelines for Preserving Historic Buildings and applicable NPS Preservation Briefs for the material being cleaned, such as “Preservation Brief 1: Assessing Cleaning and Water-Repellent Treatments for Historic Buildings.” Any cleaning treatment that may cause

damage to historic materials shall not be used. All cleaning shall be undertaken using the gentlest means possible.

- Removal of causes of deterioration, specifically the removal of a building element that is either severely deteriorated or that is causing the deterioration of adjacent materials, as long as the material being removed either: (1) does not contribute to the architectural/historical significance of property; or (2) while contributing to the architectural/historical significance of the property, the material can be replaced in kind (matching profile, material, color, texture, and size). If the latter statement applies, the historic material being removed must be so severely deteriorated that it can NOT be repaired.
- Maintenance of statues, markers, and monuments, as long as activities follow the Secretary of the Interior's Standards for Preservation & Guidelines for Preserving Historic Buildings.
- Road repaving, sidewalk repair and utility replacement where features currently exist so long as the activity involves no new soil disturbance.
- Graffiti removal from masonry structures (Including historic buildings, monuments, statues, and grave markers) so long as the work is conducted in accordance with the Secretary of the Interior's Standards for Preservation & Guidelines for Preserving Historic Buildings, and "Preservation Brief 38: Removing Graffiti from Historic Masonry." All graffiti removal methods shall be undertaken using the gentlest means possible. Removal methods shall be documented and submitted to the NY SHPO in the year end report.
- Replacement of electrical wiring, fuses, circuit breakers, electrical boxes, light switches and cover plates. The removal of historic lighting fixtures (wall sconces, chandeliers, etc) is NOT excluded from NY SHPO review.
- Replacement of water pipes, sewer pipes and drains. The replacement or removal of historic plumbing fixtures (such as toilets, water closets, sinks, bathtubs, etc.) is NOT excluded from NY SHPO review.
- Repair and thermal upgrading of historic metal windows so long as the work is conducted in accordance with the Secretary of the Interior's Standards for Preservation & Guidelines for Preserving Historic Buildings, and "Preservation Brief 18: The Repair and Thermal Upgrading of Historic Steel Windows."
- Replacement of storm windows where they currently exist so long as the replacement storm window consists of a non-reflective material that is colored to harmonize with the building. Installation of any storm window shall be conducted in accordance with "Preservation Brief 9: The Repair of Historic Wood Windows."
- Interior modifications to non-historic buildings or to non-historic spaces for the purpose of compliance with the Americans with Disabilities Act.
- Adding balusters, hand rails and other improvements to existing railings in order to meet health and safety code so long as the additions:
 - 1) do not alter or remove any historic fabric from the historic rail;
 - 2) match the existing in materials, design, profile workmanship and color;
 - 3) are distinguishable from the original work; and
 - 4) do not detract from the historic integrity of the property.

Exemptions for Landscape Maintenance Activities:

- Annual pruning of vegetation, lawn maintenance, and tree cutting for control of invasive species and maintenance of historic vistas, such as the view of the Hudson River (root pulling that results in ground disturbance shall not be undertaken);
- Planting of annual plants within existing landscape beds; and
- Stump removal in previously surveyed areas only.

Exemptions for Ground Disturbing Activities:

- Maintenance work and on existing features such as roads, fire lanes, mowed areas, disposal areas, and ditches so long as the activity involves no new soil disturbance.
- Military training activities that result in no ground disturbing activities;
- Ground disturbing military training in areas where the NY SHPO has concurred that no NRHP-eligible properties are present;
- Firing range activities within designated areas, as long as designated caliber/type of weapon is not changed and the activity is restricted to the safety apron; and
- Use of existing utility trenches (however, if the system is privatized, consultation with NY SHPO will be required).

All work undertaken on historic buildings, monuments, or landscapes, or any other cultural resources shall be monitored and documented by the CRM in the annual report to the New York SHPO. The report shall include a written description of the work, location of the work, and how the work complies with the terms of this ICRMP and associated PA. If work includes removal of historic fabric, the condition of the fabric removed shall be documented. When appropriate the report shall include photographs, construction drawings or any other documentation that supports the undertaking's exclusion from New York SHPO review. Failure to provide this documentation shall negate the terms of this ICRMP and associated PA which will subject the U.S. Army Garrison to standard Section 106 review procedures for all undertakings.

Template for Annual Report to New York SHPO, Exempted Projects

Date	Project	Building/Site	Exemption	Remarks
1 July 2010	Corps of Cadet Parade to Celebrate Holiday	Downtown Highland Falls	Not An Undertaking	
15 July 2010	Renovate Windows	Dean's Quarters, Building 103	IAW Wooden Window SOP	- Verified Project SOW - Monitored Project on 5 November confirmed SOW being followed
17 September 2010	Major Renovations to History Department Classrooms	Thayer Hall	No Historic Property Effectuated	- Verified Project SOW - Monitored Project on 31 October confirmed all work inside
5 November 2010	Modifications to Visitors Center interior for ADA Compliance	Visitors Center	ADA modifications to non-historic portions of building	- Verified SOW - Monitored Project on 11 November confirmed SOW being followed

Section 106 Review Periods and Other Schedule Considerations. The following is the prototypical schedule for case-by-case Section 106 compliance. It should be noted that West Point is not required to contact the SHPO when there are no historic properties present or if there are no historic properties affected as outlined in the ICRMP PA. However, according to the stipulations within the ICRMP PA (Appendix H), this allowance only applies if West Point maintains a qualified CRM. If no CRM is in place, this and other allowances may not be employed and case-by-case Section 106 coordination is required.

Requirements for scheduling coordination of projects through Section 106 review vary greatly and depend upon a number of factors including, but not limited, to the following:

1. Scope of the proposed action;
2. Level of cultural resources information within the area of potential effects (APE) (e.g., Are cultural resources studies required?);
3. Presence of identified NRHP-eligible cultural resources within the APE ;
4. Severity of the impact of the proposed action (e.g., demolition, mothballing) ;
5. Potential impact to historic district (direct or indirect) ;
6. Types of treatment or mitigation options;
7. Success of internal and external coordination;
8. Sensitivity of the resources (e.g., Are resources of Native American interest involved?); and
9. Preparation of agreement documents (if required).

Consequently, coordination with the CRM early in the project planning stages is critical to avoiding project delays.

Failure To Comply with Cultural Resources Program Requirements. Military personnel make daily decisions that may enhance, jeopardize, or destroy important historic and archaeological resources. The United States Congress and the President of the United States have sent a clear message by enacting numerous federal laws and regulations designed to protect resources significant to our nation's heritage. It should be noted that these resources are not owned by the federal agency entrusted with their management, they are property of the American people. Destruction of a National Register-listed or eligible resource not only results in a loss of a physical property but an opportunity for future generations to understand and honor their past. Consequently, when such an event occurs, there are penalties that may be incurred by a Federal agency that neglects to follow Federal preservation legislation, as described below.

It is a violation of federal law, specifically the NHPA of 1966 (16 USC § 470 et seq.), for the U.S. Army or any federal agency to begin construction on any project that may affect a historic building, archaeological site, or other type of historic property before receiving SHPO review comments. Consequently, failure to coordinate with the CRM and to undergo the proper Section 106 procedure may result in litigation against the Garrison Commander, the Department of the Army and the DoD. Litigation has the potential to create costly construction delays, a negative perception of the installation, and engender animosity between West Point and its neighbors. Failure to adhere to NHPA can also result in foreclosure. As defined in 36 CFR § 800, "foreclosure" means an action taken by a federal agency official that effectively precludes the ACHP from providing comments that the agency official can meaningfully consider prior to approving a project that may impact historic properties. If foreclosure occurs, the ACHP notifies the head of the Army, the Army Federal Preservation Officer (FPO), and interested parties/public that it has made a foreclosure determination. Furthermore, it is a violation of Executive Order 12731, "Principles Of Ethical Conduct for Government Officers and Employees" for a government employee to disobey the laws of the United States or its Constitution.

Army Alternate Procedures. The publishing of the revised Section 106 regulations (effective January 11, 2001) caused the DA to take a new approach by proposing Army Alternate Procedures (AAP) to 36 CFR Part 800. Although the AAP was intended to improve compliance process efficiency and reduce adverse mission impacts, installation commanders were specifically permitted to exercise their discretionary authority to choose to operate under either the AAP or the current regulations [36 CFR Part 800]. When the AAP were released, the West Point Garrison Commander, DPW Management and the West Point Cultural Resources Manager reviewed them, and determined that because of the national significance of the West Point NHL district, that it would not be appropriate to utilize experimental, unproven procedures for the protection of West Point's nationally and internationally significant historic properties, and that West Point would not implement the AAP. The New York SHPO was invited an opportunity to comment upon this decision, and formally concurred. Accordingly, the AAP are not implemented at West Point.

Section 110 Compliance. As noted in Section 1.3 of this document, Section 110 of NHPA requires federal agencies to assume responsibility for the protection and preservation of historic properties that are owned or controlled by the agency. The term "preservation," as defined in NHPA, includes management, rehabilitation, restoration, documentation, and recordation activities. Section 110 specifically dictates that each federal agency must utilize, to the maximum extent possible, historic buildings/structures that are available; locate, inventory, and evaluate all cultural resources that appear to qualify for inclusion in the National Register; and ensure that no potential National Register-eligible historic property is inadvertently transferred, sold, demolished, substantially altered, or allowed to deteriorate. Consequently, there is a two-fold approach to Section 110 compliance: (1) management and protection of existing historic properties and (2) identification, assessment, and documentation of all potential National Register-eligible historic properties.

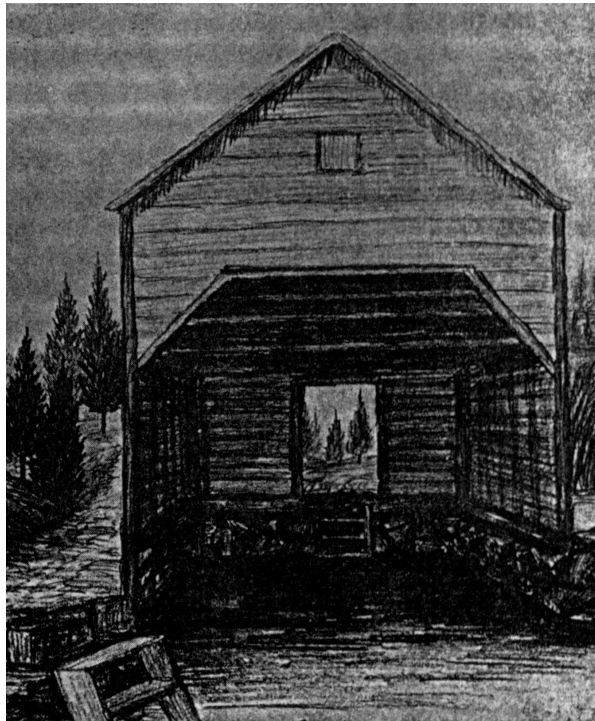
Between 2001 and 2006, the West Point Cultural Resources Management program developed a comprehensive Section 110 compliance program, acknowledged to be one of the finest DOD installation programs. Since 2006, the West Point Section 110 compliance program has been permitted to lapse, and since 2006 West Point has not been in compliance with Section 110 of the NHPA.

In the area of historic properties management, the West Point CRM is responsible for monitoring the condition of historic properties, which include historic buildings, structures (such as dams, iron gates, and stone walls), monuments, archaeological sites, and ruins. Properties are monitored through communication with facility managers (i.e., building commandants and range staff), review of work order requests, visual inspection, and formal condition assessments. Condition assessments, which are developed as part of HSRs, contribute to the documentation of historic properties, their maintenance history, character-defining features, and integrity. In 2004–2005, the West Point Cultural Resources Management Office prepared HSRs for Warner House on Constitution Island; the Ordnance Compound; and military background, engineering design, and historic significance of West Point's Revolutionary War River Defenses. Additional HSRs were prepared for historic General Officers' Quarters #100 and #102 by USACERL; the 1931 and 1935 Historic NCO Family Housing Quarters; and the Wilson Road Quarters. Additional HSRs are planned for other types of historic housing on post. The CRM maintains a list of historic properties requiring measures such as protection, stabilization, or restoration to prevent deterioration. In addition to seeking "brick and mortar funds" (maintenance and restoration funding) the CRM regularly applies to alternative sources such as DoD Legacy, USMA Association of Graduates (AOG), Constitution Island Association, New York Preservation League, National Trust, and other granting entities. Recent examples of projects include the AOG-funded conservation of the Washington Hall Mural of Military History, and the DoD Defense Legacy Resources Management Program Grant (awarded to West Point and Fort Monroe,

Virginia) to support the development of preservation and stabilization strategies for military fortifications throughout DoD.

A number of stabilization/restoration projects successfully undertaken at West Point over the last five years have included reconstruction of the Constitution Island Warner family boathouse; Warner House foundation archaeology; Queensboro Furnace foundation archaeology; and Redoubt 2 restoration. The Warner House archaeological investigations identified the cause of a potentially catastrophic foundation failure at this nationally significant historic property. The Queensboro Furnace study determined that the structure's foundation was stable and permitted the formulation of an effective scope of work for its eventual preservation.

The Cultural Resources Management Office has also utilized cadets from the academy's civil and mechanical engineering program to assist with various preservation projects. In 2004 and 2005, the First Class Cadets designed a protective shelter for Queensboro Furnace, developed a land use plan that took into effect historic and aesthetic considerations at the historic Ordnance Compound, and designed viewing platforms at several of the Revolutionary War redoubts.



Boathouse As Drawn by Anna Warner, c. 1850



Center: Warner Family Boathouse in 2002



Boathouse following restoration by WP CRM Office and WP Directorate of Public Works, fall 2003

Demonstration of a Successful Section 110 Project as performed at the USAGWP, 2003.
[Courtesy Constitution Island Association; D. R. Cubbison, 2002; and D. R. Cubbison, 2003]

Historic research, surveys/inventories, development of historic contexts, and National Register assessments are integral elements of the West Point Section 110 compliance program. Over the last five years, the diversity, extent, and national significance of the academy's resources, combined with the Section 106 requirements, have necessitated that the Cultural Resources Management Office undertake a significant number of cultural resources investigations and studies. Several initiatives undertaken by the Cultural Resources Management Office have increased the program's efficiency and effectiveness, and have reduced the Section 106 compliance burden. These initiatives have included the following:

- Development of multiple historic contexts (specific to development periods or property or resource type) to aid in the NRHP assessment and documentation of historic properties. Such documents allow the CRM to more effectively evaluate resources and potential impacts of future activities;
- Utilization of the cultural landscape approach to identify potential archaeological resources and historic landscape features. This approach includes, most notably, employing geographic GIS and global positioning system (GPS) technologies in conjunction with historic maps to identify archaeologically sensitive areas or areas where historic landscape elements were introduced in the past. This method has proven particularly beneficial in the core area of West Point where there is a significant history of past development;
- Utilization of different contracting vehicles to obtain services from cultural resources contractors. Specifically, the CRM, with West Point's contracting staff, solicits proposals and requests for quotes from potential contractors and directly supervises all cultural resources contractor work, thus eliminating intermediate agencies (such as the USACE). This has proven effective in reducing

costs for Section 110 compliance-related studies and improved documentation derived from said studies;

- Active participation of CRM staff in cultural resources studies, including historic research and documentation of resources (such as HSRs); and
- Improvement and standardization of techniques used in cultural resources surveys. These procedures include, for example, setting specific protocols for GIS and GPS mapping of sites and their boundaries, and defining survey areas.

Cultural Resources Site Monitoring Form. Regular monitoring of West Point historic properties, particularly the Revolutionary War military fortifications, need to be performed on a monthly basis. During 2001 a simple two-page Cultural Resources Site Monitoring Form was developed. During the development of the *Stabilization and Preservation of Department Of Defense Owned Military Fortifications* (Washington, D.C.: Department of Defense Legacy Resources Management Project 05-239, March 2006) the West Point Cultural Resources Management Office prepared a simple inspection checklist that should be used to conduct a monthly assessment of military fortifications. Photographs should be taken and drawings made as appropriate, and a simple inspection assessment should be completed on-site and maintained in a binder for each historic property, so that changes over time can be identified. This checklist was regularly used for inspections of West Point historic properties between 2002 and 2006, and has proven to be a valuable inspection and assessment tool. A copy of this checklist, and an example of an inspection performed using it, are provided below.



Stabilization and Preservation of DoD-owned Military Fortifications

**Project
05-239**

Military Fortification Inspections Checklist:

1. Evaluate and Document Existing Conditions
 - Prepare Surveyed Drawing of Feature
 - Use Digital Camera to Document Conditions
2. Evaluate Vegetation Cover of Earthworks
 - Vegetation Cover should be continuous
 - Brush and Shrubs that do not hold soil should be removed
 - Aggressive Mowing should be avoided
 - Trees that provide canopy cover should be encouraged
3. Identify Inappropriate Vegetation
 - Trees that are dead or rotten should be removed
 - Trees that block important historic vistas should be removed
 - Trees growing on earthworks or fortifications should be removed
4. Evaluate Visitor Use
 - Pedestrian routes
 - Parking areas
 - Vehicle access
 - Inappropriate uses (bicycles, dirt bikes, etc.)
 - Military training opportunities
 - Community recreational use
5. Evaluate Areas of Active Erosion
 - Dirt washing away
 - Exposed rocks or soil
 - Obvious water routes
 - Water pooling or standing water
6. Look for Bulges or Areas of Imminent Collapse in Walls or Structures
 - Fallen Stones
 - Missing Chink stones
 - Missing Mortar Joints
 - Wet or Damaged Brick
 - Cracks
7. Evaluate Animal Activity
 - Deer Trails
 - Burrowing Animals
 - Pests (bees, hornets, wasps, snakes, etc.)
8. Look for Evidence of Vandalism or Relic Hunting
 - Small Dug Holes
 - Fire pits for parties
 - Garbage

**USAG West Point
Cultural Resources Site Monitoring Form**

Site	Redoubt No. 1, 2, 4 at Stony Lonesome Redoubt Wyllis and Battery Miegs at Lusk Housing Queensboro Furnace Chain Battery and Water Battery on Flirtation Walk	
Date of Visit	Monday, October 17, 2005	
Visit Performed By	D. R. Cubbison, West Point Cultural Resources Manager Travis Beckwith, West Point Architectural Historian	
Weather (current and recent)	Partly Sunny with Moderate Winds. Record-setting rainfall from Friday, Oct. 7 th through Saturday, October 15 th . 20.45" of rain official totals at New Windsor, nearly as much at West Point. Considerable flooding in Orange County, and throughout West Point.	
Observation	Indicators	Findings and Actions Taken
Relic Hunting	Small blade-dug holes, metallic trash excavated	None observed at any sites. Recent heavy rainfall would have obscured any indicators, and prevented most visitations to the sites.
Vandalism	Trash, graffiti	Commemorative Plaque at Redoubt No. 2 was spray-painted by vandals (recent occurrence). Wall at Redoubt No. 4 to left of large interpretive plaque has been knocked down, apparently by cadets doing rock climbing. Wall at Re-entrant angle of Redoubt No. 4 has had stones pulled down and steps constructed to provide access to interior of redoubt.
Ground Disturbance	Pedestrian trails, fire pits, bicycle tracks	None new observed. Recent heavy rainfall would have obscured any indicators, and prevented most visitations to the sites.
Tree Falls		None observed that effected historic properties.
New Vegetation		Redoubt No. 1- the left pedestrian foot trail has completely grown over. Redoubt No. 1- the right pedestrian foot trail is re-generating quite nicely, but foot path still visible. Abatis and signage are working well.
Vegetation Changes	Tree died, tree branch loss, tree growth	Redoubt No. 1- rotting tree removed from east parapet wall, improved viewshed considerably and removed threat to redoubt. Redoubt No. 2- several live and dead trees need

		to be removed to improve line-of-sight to Redoubt No. 1. Service Order submitted.
New Erosion	INDICATE ON MAP AND PHOTO-DOCUMENT IF POSSIBLE	<p>Redoubt No. 1 – no new erosion noticed.</p> <p>Redoubt No. 2- approx. 10 lineal feet collapse inside redoubt. Redoubt funded for stabilization using DOD Legacy Funds this fall, no corrective action necessary.</p> <p>Redoubt No. 4- considerable active erosion of earthen parapet walls on north side observed, stone work not endangered.</p> <p>Redoubt Wyllis- significant new erosion observed at both redoubt and detached battery. Three separate areas of total structural collapse on the interior of Redoubt Wyllis, approximately 30 feet in total lineal area, were observed. The exterior of both the battery and the redoubt were observed to be in particularly precarious circumstances. New areas of active erosion were noted at numerous locations, and a number of stones were washed away or fell out. The walls of this redoubt and battery are in imminent danger of structural failure. Survival of this historic property is immediately endangered.</p> <p>Battery Meigs- approx. 50 feet of lineal feet of west parapet has totally failed; another 50 feet of lineal feet of west parapet is in immediate danger. New area of active erosion at SW corner of parapet immediately endangers surviving cannon platform. Survival of a large component of this battery is immediately endangered.</p> <p>Queensboro Furnace- No new collapses were observed. Structural failure remains imminent.</p> <p>Chain Battery and Water Battery- No new areas of active erosion were noted. Chain Battery appears to have stabilized following partial collapse during Tropical Storm Jeanne last September.</p> <p>Flirtation Walk- Numerous areas of considerable erosion and wash-outs of trail observed.</p> <p>Other areas of erosion and water damage were observed throughout installation, but surveys were limited to historic properties.</p>

		Complete digital photographic documentation of Redoubt Wyllis erosion taken.
Animals Observed In Vicinity		Wild turkeys observed at Redoubt No. 1 vicinity.
Pests	Groundhogs, rodents, bee hives, snakes	None observed.
Other Inappropriate Uses	Military training, scout camping, hunting	None observed. Recent heavy rainfall would have obscured any indicators, and prevented most visitations to the sites.
Other Concerns		Sent notice upon return to Jim Kennedy, Family Housing re: concerns with safety of Lusk Family Housing residents at Redoubt Wyllis, residents should be cautioned not to stand upon redoubts, and children should be told not to play on or around.
Remarks		Redoubt No. 3 not visited, no concerns with erosion at this site. Constitution Island needs to be visited later this week.

Form Prepared by D. R. Cubbison, DHPW, West Point, 08 July 02



An example of how rapidly a seemingly solid masonry structure can deteriorate. This is a photograph taken of Fort Putnam at West Point c. 1870. The brick casemates at Fort Putnam were constructed c. 1793, during the construction of the first series of Coastal Defense Fortifications. At that time the original Revolutionary War Fort Putnam was expanded, and brick casemates capable of withstanding concentrated artillery fire were installed. Fort Putnam was manned through the War of 1812, and abandoned shortly following the cessation of hostilities. Thus, only fifty years of neglect resulted in their total failure and collapse. (Pitman Collection, Special Collections and Archives, U.S. Military Academy Library, West Point, New York).

Archaeological Resources Management. As noted above, the West Point Sections 106 and 110 programs trigger the need for identification, assessment, and management of the facility's archaeological properties. These properties reflect occupation/use ranging from the prehistoric to historic-era Revolutionary War, early settlement, early industrial, and early academy time periods. Archaeological investigations are conducted to support various Range Control, DPW, and DMI projects. These studies are most commonly performed by professionally qualified contractors whose work is directly supervised by the West Point CRM.

Of West Point's 16, 085 acres, approximately 14, 527 acres are accessible for inventory. At the end of the 2009 field season, approximately 7,256 acres (roughly 50 percent) of the facility will have been surveyed. All archaeological surveys are conducted using topographic features (such as roads, ponds, etc.) to define survey area boundaries (in addition to number of acreages). All sites are recorded on New York State site forms (see Appendix F for sample forms), and site locations are recorded using GPS technology. Once identified, recorded archaeological sites are added to West Point's GIS data layers and the Cultural

Resources Management Office's inventory. All archaeological sites are treated as NRHP-eligible and protected until receipt of SHPO concurrence for resources determined not eligible for NRHP listing.

Since 2006, West Point has been annually conducting cultural resources surveys of substantial acreage of the West Point Reservation. Although portions of the reservation remain un-surveyed, the continuation of this annual survey effort will over a period of years result in accurate surveys being performed for the entirety of West Point.

The CRM actively monitors and manages all NRHP-eligible resources. Previous archaeological resources management practices have included the following:

- Posting "Environmentally Sensitive Area" signs where sensitive cultural resources, such as the Revolutionary War redoubts, are located. This program has reduced damage to archaeological resources;
- Utilization of in-house equipment operators (from the Roads and Land Maintenance Branch) for archaeological investigations requiring heavy machinery. Such involvement serves as an invaluable training opportunity for the equipment operators, familiarizing them with archaeological materials and features that may be encountered during other earth-moving activities on post;
- Implementation of ARPA compliance initiatives to prevent illegal excavation on post; and
- Construction of viewing platforms at Redoubts 1 and 2 to prevent visitors and cadets from inadvertently destroying site features.



Not all archaeological and landscape resources are immediately evident as to their historic significance. To the north of Roman's Powder Magazine is a beach used for landing batteaux on Constitution Island during the American Revolution, with a rich quartermaster and logistical complex and regimental camp located immediately adjacent to it on the island. Generals George Washington, Benedict Arnold, Baron Von Steuben, and Henry Knox are among those distinguished Americans whose boots stepped ashore on this beach. [D. R. Cubbison, 2005]

As an alternative means of supporting part of the sites management program in 2005, the West Point Cultural Resources Management Office applied for and received a grant through the Department of Defense Legacy Resources Management Program to support the development of preservation and stabilization strategies for military fortifications throughout DoD. This report, which was finalized in March 2006, utilized grant funds for the restoration of Redoubt No. 1, Redoubt 2 and Roman's Powder Magazine as a demonstration project for the investigation. The techniques and methods described in the report will also aid in the restoration of all additional fortifications at West Point.

Unfortunately, since 2006, the active management of the West Point archaeological resources has been permitted to lapse, and requires re-establishment. Since 2006, West Point has not been in compliance with archaeological resources management responsibilities, particularly as regards the Archaeological Resources Protection Act (ARPA) and Native American Graves and Repatriation Act (NAGPRA).

As part of West Point's ongoing efforts to identify archaeological sites, historic landscape features, rock inscriptions, and other types of resources, the Cultural Resources Management Office makes use of the Historic Map Layer Project, which employs historic maps in combination with current GIS maps to locate potential historic properties. This procedure involves overlaying historic maps with known sites/buildings/features (such as Fort Clinton) with modern GIS maps with the same known point(s). For example, by overlaying geo-referencing a historic map depicting the location of a demolished building and tying it to with a modern map through a common extant building or site feature, invaluable data concerning the potential location of buried foundations and features associated with the now-demolished building can be obtained. This approach can also aid in the identification and restoration of lost landscape elements such as those associated with the Olmstead Plan; assist in the documentation of the academy's evolution over time; and serve as an academic tool for studying Revolutionary War defenses.

The DPW GIS Office has established an effective layer of historic maps that is routinely used to assist with planning. Eventually, the Cultural Resources Management Office intends to have a decade-by-decade series of West Point maps beginning with the 1770s.

If an archaeological site is disturbed either intentionally or unintentionally, the potential data from the site may be lost or greatly diminished. ARPA makes it a felony for persons to excavate, remove, damage, or otherwise deface any archaeological resource or paleontological resource located on federal lands. Archaeological investigations, other than those accomplished as part of the installation's archaeological resources management responsibilities, on military-controlled lands require a federal permit issued by the federal land manager. It should be noted that the CRM, under ARPA and Section 304 of NHPA, may withhold any information pertaining to the locations of archaeological sites if disclosing such information would put the resource at risk. Consequently, archaeological site locations at West Point are not released in public documents.

Since 2001, there have been two known instances of relic hunting at West Point. In August 2001, relic hunters used metal detectors at Redoubts 1 and 2 at Stony Lonesome, and in August 2003, a Native American rockshelter in Training Area C was looted. In response, the West Point Cultural Resources Management Office initiated focused efforts to support enforcement of ARPA, including meetings with various West Point commanders, military officers, and community members; community notification through West Point's weekly newspaper; increased communication with other area public land managers regarding relic hunter activities within the region; and ARPA awareness training for Military Police officers and detectives. The West Point Provost Marshall's Office also enhanced its law enforcement patrols in vulnerable areas.

Unfortunately, since 2006, the active enforcement of ARPA at West Point has been permitted to lapse, and the position of ARPA Enforcement Officer for West Point has become vacant. The ARPA enforcement effort should be re-invigorated.

Artifact Curation—36 CFR § 79 Compliance. Maps, records, notes, labeled artifacts, photographs, and reports associated with archaeological inventory, survey, and excavation projects are to be curated in a federally approved institution per 36 CFR § 79. Curation ensures that records and materials are preserved and made available to researchers in the future. Archaeological investigations on West Point lands have resulted in the collection of nationally significant materials. Inventory and cataloguing of the entire West Point archaeological collection were completed in the spring of 2004. By that time, all items had been labeled and placed in archival storage materials. Currently, the collection contains approximately 14 cubic yards of materials. These items are stored in a secure, temperature-controlled facility near the West Point DPW offices. Humidity levels were regularly monitored and logged by the CRM through 2006, at which time the sensors were removed by the West Point Museum, as several years' monitoring revealed that the storage facility remained within acceptable curatorial standards.

Additional collections include:

- Constitution Island collection (5,000 artifacts);
- Revolutionary War collection (8,000 artifacts) and Jefferson Hall (New Library) (500 artifacts); and
- Queensboro Furnace collection (500 artifacts)

In 2005, the Constitution Island collection, which required conservation and curation, was sent to a professional curation facility at Lake Champlain Maritime Museum for permanent conservation. Curation of this nationally significant collection was completed in 2006. Since then, the two remaining significant collections remain un-curated and have not been conserved. Comprehensive examination of this collection in October 2010 disclosed that this effort was performed to the highest possible standards.

Similar arrangements should be made for the conservation of American Revolutionary War artifacts from West Point (in FY 2012) and the Queensboro Furnace collection (in FY 2013). Consequently, within the next two fiscal years, it is anticipated that all artifacts within the West Point collections will be in full compliance with 36 CFR § 79 by 2007.

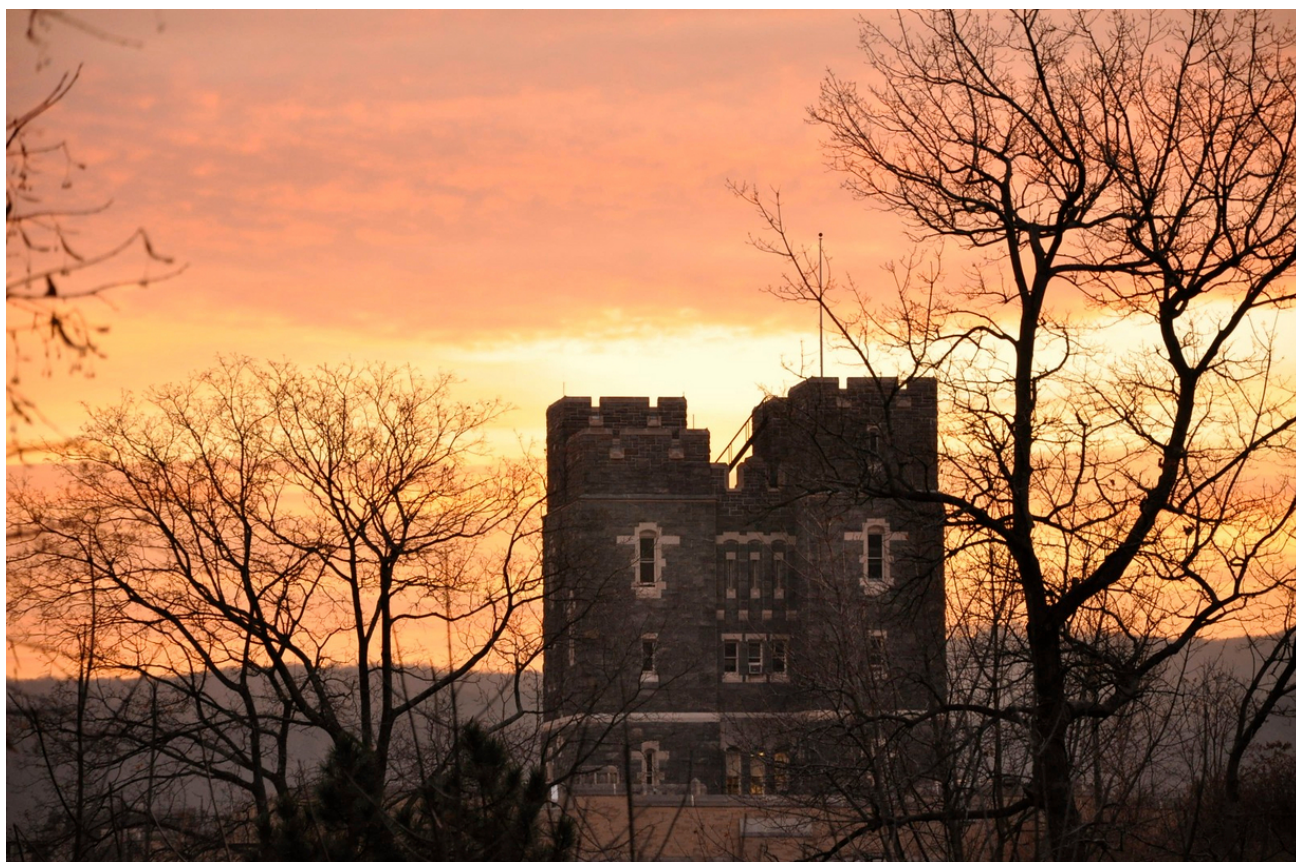
Native American Consultation. The NHPA, ARPA, NEPA, and EO 13007 (Indian Sacred Sites) all contain Native American consultation requirements. Section 106 of NHPA coordination requires that a federal agency, when potentially impacting or having an impact on NRHP-eligible/listed historic properties, must consult with other federal, state, and local agencies, as well as federally recognized Native American tribal groups. Under ARPA permit-granting regulations, Native American tribes must be notified of potential impacts that may affect properties holding significance for them. NEPA requirements dictate that EAs and EISs be made available to the public for comment on potential impacts to environmental and cultural resources. EO 13007, which allows Native American tribes the religious use of and access to sacred sites, directs agencies to implement or propose procedures to facilitate consultation with appropriate Native American tribes and religious leaders to expeditiously resolve disputes relating to agency action on federal lands that may adversely affect access to, ceremonial use of, or the physical integrity of sacred sites. Consultation requirements also apply under NAGPRA if Native American human remains and associated funerary objects are uncovered in an archaeological excavation at West Point.

In 2005, the Cultural Resources Management Office worked with USACERL to review West Point Native American consultation procedures and requirements, and to formalize a West Point–Native American

consultation program. As part of this process, three historic nations, the Mohicans, Delaware Nation and the Delaware Tribe of Indians, were identified as potentially having an interest in West Point activities and historic properties. Consultation was initiated with the Stockbridge-Munsee Band of Mohican Indians, and in October 2005, a MOU was signed between West Point and the Stockbridge Munsee Nation (representing the interests of the Delaware Nation and the Delaware Tribe of Indians). The MOU outlined consultation procedures for activities that may affect properties of religious or cultural significance to the Stockbridge-Munsee Band of Mohican Indians and activities that may result in the inadvertent discovery or excavation of human remains or cultural items that are culturally affiliated with the Stockbridge-Munsee Band of Mohican Indians on lands owned or controlled by West Point.

West Point recognizes that consultation with Native American tribes is required under multiple legislative acts and requires a fundamental knowledge of tribal interest and protocol, and an ability, or willingness, to conduct consultations on a government-to-government basis. West Point also recognizes that Native American tribes possess a unique experience in both written and oral history to identify and evaluate historic properties of religious and cultural significance.

Architectural Resources Management. Historic architectural properties require special treatment and protection during ongoing use, routine maintenance, and repair. These activities must be structured so as not to alter or change the historic character of the building or its setting and, to the greatest extent possible, should seek to preserve the integrity of the property. The preservation and protection of architectural resources is particularly challenging at West Point, where the large number of NRHP-eligible buildings (over 334), their NHL status, and maintenance requirements can be overwhelming from the Sections 106 and 110 compliance perspectives. As discussed in Sections 1.4.4.1 and 1.4.4.2, the Cultural Resources Management Office now participates in project review at the scoping stage for many activities including large maintenance and repair initiatives and new construction. This allows the CRM to assist the project's proponents in developing scopes of work that avoid impacts to historic architectural properties and, in some cases, avoid further Section 106 consideration under the 2003 PA. All work orders continue to be reviewed by the Cultural Resources Management Office. When determined to be required, consultation with the SHPO is also initiated as early as possible.



The distinctive Military Gothic architectural style, created and refined at the U.S. Military Academy prior to the Civil War, is viewed by the Corps of Cadets, the officers and soldiers of the U.S. Military Academy, the United States Army, and American and international citizens to both symbolize West Point and to render it unique, not only in the nation, but throughout the world.
[©jenniferbutkus.photography]

Inspections, repairs, and preventative maintenance are guided by general guidelines, such as the Secretary of the Interior's standards for historic preservation projects [36 CFR § 67] and National Park Service Preservation Briefs, as well as by SOPs specifically developed in 2004–2005 for West Point.

As required by Section 110 of NHPA, West Point shall utilize, to the maximum extent possible, historic buildings/structures that are available, and ensure that no potentially National Register-eligible historic property is inadvertently transferred, sold, demolished, substantially altered, or allowed to deteriorate beyond economical repair. The CRM is responsible for monitoring the condition of historic properties. Inspections, repairs, and preventative maintenance are guided by the Secretary of the Interior's Standards for the Treatment of Historic Properties [36 CFR § 68], National Park Service Preservation Briefs, and SOPs specifically developed in 2004–2005 for West Point.

Between 2002 and 2006 the Cultural Resources Management Office formed relationships with the DPW Shops (e.g., Carpentry, Electrical) to ensure application of the SOPs and to promote salvage and restoration of historic fabric. A salvage collection was also established. Regrettably, since 2006 these efforts have been permitted to deteriorate, and these two highly beneficial programs should be re-established.

Aesthetic Resources. Aesthetic resources consist of natural and man-made landscape features that appear indigenous to the area and give a particular environment its visual characteristics. Over the 200-year history of West Point development, a careful balance has been maintained between the man-made and natural environment. The natural environment is characterized by scenic views of the Hudson River, pockets of forested areas, and the rocky and hilly topography of the Highlands. Set within this backdrop is West Point, whose built environment ranges from Revolutionary War-era reconstructed fortifications, historic buildings, and structures representing each phase of the academy's development, to new construction. There are also many designed landscape components (e.g., parade grounds, athletic fields, and gardens), monuments, bridges, and dams. Collectively, this setting is of national importance, as recognized by the National Historic Landmark District designation of over 2,000 acres that include the academy's core. It also part of the West Point sense of tradition, character, and identity.

Historic landscapes at West Point include but may not be limited to vistas and views of the Hudson River, athletic fields and parade grounds, the Plain, West Point Cemetery, Flirtation Walk, Kosciuszko's Garden, and Superintendent's Garden. These features are key contributing elements of the NHLD and, like historic buildings and structures, can be impacted or lost through inappropriate maintenance, removal, or additions such as new construction. West Point shall continue to be sensitive to these resources and consider potential impacts of facility activities on these resources. The HLMP developed by Loechl et al. (2001) shall continue to serve as an important guide to the restoration and protection of these significant features of West Point's historic environment, including the overall parent landscape, featured landscapes (such as those listed above), and housing area landscapes (i.e., Professor's Row Housing Area, Thayer/Wilson Housing Area, Lee Housing Area, and Lusk Housing Area).

The retention of aesthetic resources that contribute to the historic character and identity of the academy, as with the other types of historic properties, is not only legally required, but their preservation is critical to West Point's mission. Consequently, the Cultural Resources Management Office uses a number of tools to evaluate, document, and manage aesthetic resources and avoid potential impacts. These tools include the following:

- Continued utilization of the 2001 Historic Landscape Management Plan;
- Standardized designs for facility infrastructure such as security devices, bollards, and lighting that are consistent with post aesthetics and sensitive to the historic character of the NHLD;
- Improvements to the Section 106 coordination process, including early participation of the CRM and early coordination with the SHPO;
- Computer-generated models to create graphic simulations to ascertain potential visual impacts of new construction within sensitive areas of the academy;
- Continued inventory efforts, such as the Historic Dam survey in 2006, to document historic built features;
- Adoption of the Army's cultural landscape approach and utilization of GIS technology with historic maps to document historic land use patterns; and
- Restoration of historic landscape elements such as prominent view sheds, tree stands, green spaces, and planting areas.



A typical historic landscape at West Point. From Hill Cliff Battery on Constitution Island looking west, across the Hudson River where the Chain and Log Boom was stretched across the river during the American Revolution. The restored Warner Family boathouse is in the foreground. Across the Hudson is the site of Fort Clinton, the 19th Century West Point Hotel, and the Plain.
[D. R. Cubbison, 2005]



A typical historic landscape at West Point. From Gravel Hill Battery on Constitution Island looking south, down the Hudson River towards Forts Montgomery and Clinton, the 1930s Bear Mountain Bridge, and New York City.
[D. R. Cubbison, 2005]

The CRM's utilization of standardized designs and materials for facility infrastructure elements has greatly reduced related Section 106 coordination and has resulted in the creation of an aesthetically pleasing environment that is in harmony with the historic character of the post. Substitutions to approved designs or materials, however, necessitate additional coordination and consultation under Section 106.

Consequently, the Cultural Resources Management Office strongly recommends application of a standardized approach to project proponents. Such policies should be included as part of the revision of the Installation Design Guide (IDG), which is currently outdated. Additional discussion of the revision of the IDG and CRM involvement in that effort can be found in Section 4 of this ICRMP.

Implementation of the previously designed North Dock Park has been initiated between 2006 and 2010. Although the full plan has not yet been implemented, the appearance of the North Dock vicinity has been considerably improved, and now serves as a resource for the Corps of Cadets and West Point community.

Historic Research and Studies. Beginning in 2002, the Cultural Resources Management staff of West Point DPW initiated an annual study effort focused on selected topics of significance to the history, cultures, and tradition of West Point. Between 2002 and 2006, the following studies were performed:

1. History of Proctoria, the Central Valley Estate of Vaudeville Magnate Frederick Proctor (April 2002);
2. The Redoubts of West Point (January 2004);
3. The Hudson River Defenses at Fortress West Point, 1778-1783 (January 2005); and
4. Logistical and Quartermaster Operations at Fortress West Point, 1778-1783 (February 2006).

Continuous research, study, analysis and publication of relevant historic studies on various elements of West Point history is a key component of the West Point Cultural Resources Management program.

SOPs for Cultural Resources Actions. The following SOPs have been adopted by West Point, establishing a step-by-step process for complying with federal preservation legislation. Each SOP in its entirety can be found in Appendix G of this ICRMP.

- Maintenance and Repair SOP: Proposed Maintenance, Repair, Rehabilitation, or Leasing of Historic Properties;
- SOP #1 Slate Roof Inspection and Repairs;
- SOP #2: Wood Roof Inspection and Repairs;
- SOP #3: Inspection of Masonry Walls (Structural and Retaining) ;
- SOP #4: Masonry Re-pointing and Repairs;
- SOP #5: Wooden Door Inspection and Maintenance;
- SOP #6: Ornamental Metal/Hardware Inspection and Repairs;
- SOP #7: Interior Paint Inspection and Repainting ;
- SOP #8: Plaster Walls and Ceiling Inspection and Repairs ;
- SOP #9: Exterior Paint Inspection and Repainting;
- Wood Window SOP: Maintenance and Repair of Wood-Framed Windows (8-9-04);
- SOP #10: Salvage Procedures for Historic Building Fabric from Construction and Demolition Projects;
- SOP #11: Protection Procedures for Historic Building Fabric during Construction and Demolition Projects;
- SOP #12: Emergency Response Procedures (protecting historic artifacts/fabric, associated or historical documents, etc., from an emergencies such as weather events or fire);
- SOP #13: Coordination of NEPA with Cultural Resources Requirements;

- SOP #14: Response to ARPA Violation;
- SOP #15: Procedures for Discoveries of Human Remains during Archaeological Excavations; and
- SOP #16-1: Protection of Archaeological or Historical Artifacts (requires revision).

SOPs #1 through #9 and the Wood Window SOP all directly relate to maintenance and repair of historic properties and associated historic fabric. SOP #10 establishes a salvage collection for historic fabric. Emergency response procedures for various situations that may impact historic properties can be found in SOPs #12, #14, #15, and #16-1. SOP #13 outlines the NEPA process for Section 106 coordination.

Disposal of Property. The disposal or leasing of any historic property to a non-federal entity constitutes an undertaking. Any transfer of federal property without legally enforceable restrictions that guarantee its long-term preservation constitutes an adverse effect (36 CFR 800.5). It is the responsibility of the specific project manager or the West Point Real Estate Division to notify the EP&SD that a historic or potentially historic property will be excessed. Frequently, such notification arrives late in the excessing process, resulting in belated awareness that the Section 106 proof of consultation is not in a real estate or environmental package. Coordination and consultation must be initiated as early as possible.

Disposal of federal property frequently operates within a short timeframe in which the following actions must take place:

- Determination of the presence or absence of historic properties;
- Determination of effect; and
- Development of a mitigation plan (preservation, covenant restrictions, alternative uses, data recovery), if necessary.

These actions are addressed through the Section 106 process. If Native American human remains, sacred objects, or objects of cultural patrimony are present, NAGPRA also would be applicable. It is especially important to remember that public consultation must occur throughout the process. Excessing or leasing federal property and removing it out of federal control requires compliance under NEPA.

The excessing or leasing of federal property to another federal agency involves no impact to historic properties, for such properties merely become the responsibility of the new federal manager under NHPA. If a property is leased to another federal agency at West Point, then West Point still maintains responsibility for compliance activities related to that property.

National Register of Historic Places Nominations. The Army will prepare NRHP nominations for eligible properties at West Point only when those properties will be actively managed by the installation as a site of interest open to the general public as set forth in the interim “Headquarters Department of the Army Policy on Nomination of Historic Properties” dated 25 July 1997; or if properties are transferred outside of Federal agency control. These nominations will be developed in consultation with the SHPO and, as necessary, with NPS National Historic Landmark or National Register staff.





Chapter Four

West Point Cultural Resources Management Program Recommendations

The following recommendations are made for the revitalization and continuation of the West Point Cultural Resources Management Program. These recommendations are provided by Fiscal Year, with Fiscal Year 2011 recommendations (through September 2011) being those that can be immediately implemented by West Point, using existing staff and budgets. Finally, ongoing or continuous efforts that are not appropriate for phasing by Fiscal Year are separately presented.

The most important recommendations are that this ICRMP be coordinated with the New York SHPO and ACHP, and that the PA implementing this ICRMP be formally completed and accepted into use by West Point, the New York SHPO and the ACHP.

Measures should be taken to ensure a full staffing of the West Point CRM program, including a Cultural Resources Manager, and a supporting Architect and Archaeologist.

Immediate (Fiscal Year 2012). Following the initial site survey of West Point in October 2010 by the ICRMP Revision Team of Stone Fort Consulting LLC, the following four immediate recommendations were made:

1. Mr. Church and Mr. Meyer should attend formal Section 106 and Preparing Agreements Documents (MOA/PA) training presented by the Advisory Council on Historic Preservation at the earliest opportunity. This will have minimal budget requirements;
2. The CRM Reference Library should be immediately re-assembled, in accordance with the existing ICRMP Bibliography. A number of Historic Architectural references were noted to be missing, and approximately \$100-\$200 should be expended by West Point DPW for the acquisition of appropriate Historic Architectural guidance references.
3. Mr. Church needs to be afforded sufficient time to perform regular site surveys, field visits, project visits, coordination visits to resume the cultural resources compliance and monitoring program; and to more effectively manage and protect West Point cultural resources. Stipulated mitigations identified in Section 106 documentation need to be monitored, verified, and enforced/corrected as appropriate.

An active monitoring and enforcement program will help reduce incidents/violations and will resume the ARPA enforcement component of the CRM program required by Federal law; and

4. Since 2007, consultations with the Stockbridge Munsee Band of Mohican Indians per the 2005 Memorandum of Understanding with them have been permitted to lapse by West Point. The West Point Cultural Resources Management program should continue the previously established formal consultation, and maintain the nation to nation relationship, with the Stockbridge Munsee Band of Mohican Indians (Wisconsin) concerning Native American cultural resource issues such as the handling and disposition of Native American human remains and cultural objects. This should be an immediate program goal to be implemented in FY 2011 by the West Point CRM. Mr. Cubbison of the ICRMP revision team provided consultation services to West Point as a component of the ICRMP Revisions that expedited this effort; and a meeting was held between DPW and the Garrison Commander with the Tribal Preservation Officer of the Stockbridge Munsee nation on December 7, 2010. The program should also establish formal consultation with the Saint Regis Mohawk Tribe (Akwesasne, NY) concerning Native American cultural resource issues such as the handling and disposition of Native American human remains and cultural objects. This should be a West Point priority, and should be implemented in FY 2011 by the West Point CRM.

The following additional immediate recommendations for FY 2012 are made:

Cultural Resources Management Plan staffing. Efforts should be initiated to expand the cultural resources management staff to three professionally qualified individuals (Cultural Resources Manager, archaeologist, and architect) as earlier discussed under CRM Professional Qualifications. It is recognized that adding either Civil Service or Contractor staff is a deliberate and lengthy process that will require schedule and time allocation, proper coordination with numerous Garrison Command entities; and has budgetary impacts that must be planned for.

Archaeological Resources Protection Act Enforcement. The West Point Garrison Commander should formally and legally appoint an officer responsible for the enforcement of the provisions of the Archaeological Resources Protection Act (ARPA) and Native American Grave Protection and Repatriation Act (NAGPRA). This individual can either be a member of the West Point Cultural Resources Management staff, or a member of the West Point Law Enforcement staff (assigned to West Point Department of Emergency Services). In either case, the individual appointed as ARPA Enforcement Officer must immediately receive professional training in their assigned responsibilities, and such training should be completed NLT spring 2012. If a member of the West Point Directorate of Emergency Services (DES), regular and routine (in fact, ongoing and continuous) coordination must be performed with the West Point CRM.

Section 110 Program. This program, an integral component of the West Point Cultural Resources Management program, has been permitted to lapse since 2006. This program needs to be re-initiated in FY 2012, and continuously performed annually.

Section 110 reinforces the responsibilities of the Federal agency to establish a program to locate, inventory, evaluate, manage, and preserve historic properties. It also requires West Point to use, to the maximum

extent feasible, historic properties available to the agency prior to acquiring, constructing, or leasing buildings. Additionally, Section 110 establishes that no potentially National Register-eligible historic property is inadvertently transferred, sold, demolished, substantially altered, or allowed to deteriorate significantly. Discussion of West Point's five-year plan for its Section 110 compliance program is outlined in this section.

The following list of projects is recommended to be undertaken over the five-year period of the ICRMP to facilitate Section 110 compliance for the identification, evaluation, protection, and preservation of West Point's historic properties. Recommended projects are divided into four categories—(1) Construction; (2) Visual and Aesthetic Program Considerations; (3) Historic Research and Studies, and (4) Curation of Historic Drawings and Maps—and presented in order of priority for each category. In addition to specific projects, the following components of the Section 110 should be continuously performed, and can be implemented in FY 2011 without schedule or budget effects.

- Continue “environmentally sensitive area” signage program to prevent damage to sensitive areas and buffer zones for historic properties within training areas. New signs should be designed, and can be manufactured by the DPW Sign Shop; and installed by the West Point CRM;
- Resume monthly monitoring of critical and/or nationally significant Cultural Resources sites such as Constitution Island and the Revolutionary War resources by the CRM;
- Construction Projects: Warner House foundation repairs. Archaeological investigations have revealed recurring foundation problems. Repairs are required to remedy the worsening condition before these conditions endanger this nationally significant structure. West Point attempted to implement such repairs in FY 2010, but budget issues prevented its implementation. It is recommended that the Scope Of Work (SOW) for the Warner House be immediately reviewed and the project either reduced, or implemented over a number of years. Suggested implementation by fiscal year 2011;
- Continue the training program concerning cultural resources and appropriate management procedures for installation staff, particularly including the Master Planner, Range staff, DPW maintenance and construction staff; DPW Managers and Project Managers; members of the DMI and Corps of Cadets previous to annual summer training;
- Support the Equal Opportunity Office by having the CRM serve as a member of the Native American Heritage Committee;
- The previous relationship between the Cultural Resources Management Office and the Civil and Mechanical Engineering departments should be restored, and annually the West Point Cultural Resources Manager should work with these departments to present First Class Cadets with cultural resources focused engineering projects that they can perform; and
- Continue public education programs. Partner with nonprofits and organizations such as the Constitution Island Association, Fort Montgomery State Historic Site, New Windsor Cantonment State Historic Site, or the West Point Museum to promote interpretation and education of West Point's varied and highly significant cultural resources.

Fiscal Year 2013.

Archaeological Surveys and Sites Management During the ICRMP review process, the ICRMP evaluated the current cultural resources layers in the GIS. These cultural resources layers are used as the primary Section 106 planning tool by the current West Point cultural resources and environmental staff.

The review indicated that numerous survey areas are either not illustrated, or were incorrect. The majority of the data appeared to have either not been reviewed or updated since 2006. The review team surmised that the problems resulted from the data simply being entered by the GIS team from the most recent cultural resources surveys, without any cultural resources staff performing a “truth check” or “accuracy check” to confirm that all GIS data was correct, valid, and properly entered into the GIS data base.

Additionally, the Archaeological Sites Inventory has not been updated since 2006, the format should be reviewed for applicability by West Point Cultural Resources Management staff and West Point contractors providing cultural resources services, and the Archaeological Sites Inventory form that supports the GIS data base needs to be reviewed, revised as appropriate, and updated.

Therefore, this ICRMP recommends that a contract be awarded to a professionally qualified archaeological and architectural firm intimately familiar with West Point to perform a comprehensive review of the entire cultural resources GIS layers for accuracy and completeness. Such a review must be performed on an individual site by site, and individual survey by survey, basis. This contract effort should additionally expand and improve the GIS database to fulfill the recommendations presented in Appendix L, to enhance and amplify the West Point cultural resources database originally established in 2005 and now over five years old.

Additionally, this contractual effort should initiate a data base integrated with the GIS so that architectural resources and archaeological resources have a one-stop inventory of known previous work, references, recommendations and index of where the original files are stored. This is very critical with buildings, and old construction plans. The data base for all of the information can be located from the GIS metadata or the Building Number or Site Number. The GIS metadata files can be updated from the data base.

Finally, this contracted effort should insure that all of the West Point archaeological sites have New York State Site Numbers assigned.

ARPA Enforcement. Since 2006, the ARPA enforcement program at West Point has been permitted to lapse. Beginning during the winter of 2012-2013, the West Point CRM should implement procedures to preserve and protect all known archaeological sites from unauthorized metal detecting, vandalism, or looting. These should include:

- ARPA awareness training for Military Police officers and detectives;
- The CRM should identify high-value archaeological sites that are vulnerable to relic-hunting through the use of metal detectors, or pot-hunting by archaeological vandals;
- The CRM and Military Police officers visit previously looted sites, or high-value archaeological sites that are vulnerable to looting;
- West Point DES should initiate regular law enforcement patrols in areas where looting may occur;
- CRM should perform routine monitoring of the condition of known archaeological sites for evidence of vandalism; and

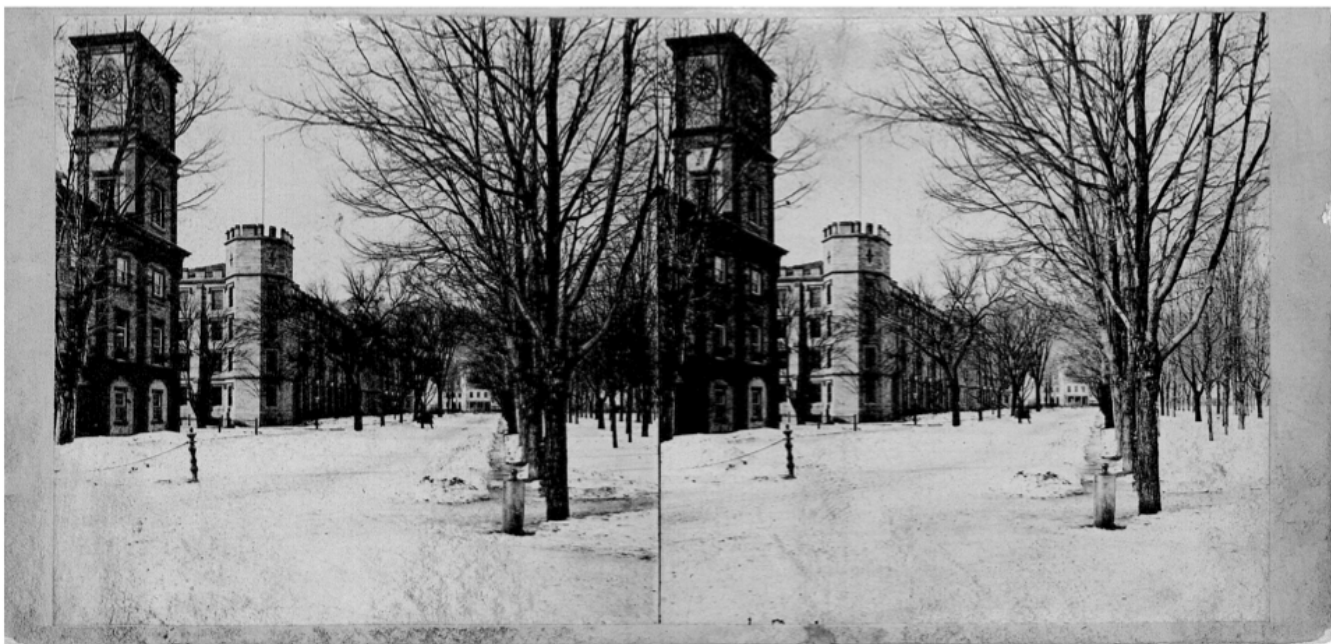
- The CRM should perform regular communication with other area public land managers regarding relic hunter activities within the region (e.g. Cultural Resource Managers and Administration of Bear Mountain State Park).

Routine monitoring by West Point DES and the CRM should begin in the spring of 2012, as soon as weather conditions and trafficability permit. Procedures outlined in SOP 14 shall be immediately enacted upon the discovery of an ARPA violation on West Point property.

Historic Map Layer Project. The Historic Map Layer project is a beneficial tool in the identification, evaluation, and study of archaeological resources. It has the potential to expand the base of knowledge related to West Point's historic sites, including the Revolutionary War resources, iron industry sites, and early academy sites. Use of the GIS system, along with known site data, shall also be used as a tool to develop new predictive models for prehistoric archaeological resources. The intent should be for the CRM and GIS support staff to have in place a historic map layer that shows the development and changes to West Point from decade-to-decade. This project should be re-initiated, and during FY 2012 the existing historic map layer should be comprehensively reviewed; the requirement for additional maps should be identified; active research performed through the Special Collections at Jefferson Hall, the History Department, the West Point Museum, and other archival collections to locate and have scanned to appropriate GIS standards additional maps. Following FY 2012, the improvement of the Historic Map Layer should be a continuous Cultural Resources Management program activity.

Installation Design Guide. The current Installation Design Guide, although updated in 2008, does not currently incorporate recommendations from the historic landscape management plan and other cultural resources studies (such as the HSRs). A revised IDG, along with other plans for the future, such as the West Point Master Plan, will provide a unique opportunity to create design standards that are in harmony with the historic environment. Consequently, the CRM should be a part of the revision process.

The recommendations and treatment options included in the HLMP should be incorporated into West Point's IDG. Standardized designs for facility infrastructure such as security devices, bollards, signage, and lighting that are consistent with post aesthetics and sensitive to the historic character of the National Historic Landmark District should also be incorporated.



This mid-19th Century Stereocard shows the Cadet Central Zone, with an inverted cannon barrel used as a bollard (right foreground). Cannons have been utilized as bollards, historic ornamentation and boundary markers at West Point for nearly two centuries. Such traditional practices have made an important contribution to the military architecture and Cadet culture at West Point, and should be documented, retained where utilized today, encouraged at all future projects, and standardized in the IDG.
[Courtesy D. R. Cubbison and West Point Cultural Resources Management Office]



Contemporary Inverted Cannon bollards at the viewing platforms of the Plain, West Point, January 2011.
[D.R. Cubbison, January 2011]

Artifact Curation (36 CFR § 79). Maps, records, notes, labeled artifacts, photographs, and reports associated with archaeological inventory, survey, and excavation projects shall be curated according to standards set forth in 36 CFR § 79 (Federally Owned and Administered Archeological Collections). The majority of West Point collections are currently housed on post in a secure, environmentally controlled storage facility. All new collections added to the West Point inventory shall be catalogued, processed, and curated according to 36 CFR § 79 standards.

West Point will archive and make available to researchers the reports generated from cultural resources investigations, with the exception of reports containing archaeologically sensitive data. A copy of all reports that may be made publicly available shall be provided to the West Point Library, Jefferson Hall. All reports containing archaeologically sensitive information shall be curated in a secure location on post and at the NY SHPO's office.

The storage facility in Building 667, although secure and appropriate for the maintenance of the collections, is not accessible to serious researchers. To those historians or archaeologists particularly interested in 18th and 19th century military material culture, the West Point archaeological collection is extremely rich, diverse and valuable; and should be made accessible for professional research and study. Accordingly, this ICRMP recommends that West Point DPW enter into a Memorandum of Understanding with the West Point Museum to provide for permanent curation of the West Point archeological collection. The collection should remain the property of West Point DPW; and access to the collection by the Cultural Resources management staff should be ensured, in accordance with this agreement document. The West Point Museum has a professional curatorial staff and facilities, and is specifically configured and staffed to facilitate use by the public. This Memorandum of Understanding should specifically permit and provide for display of appropriate archaeological artifacts from the West Point archaeological collection by the West Point Museum.

West Point DPW should complete the necessary curation and conservation of the other two nationally significant collections before they are transferred to the custody of the West Point Museum.

Section 110 Construction. Restoration of Chain Battery to repair damage caused by a 2004 tropical storm. Restoration will facilitate History Department's and the Department of Military Instruction's use of this battery for academic and military instruction of cadets. This should be a West Point priority project, with suggested implementation by fiscal year 2012.



The 1778 Chain Battery collapsed as a result of Tropical Storm Jeanne on September 27-28, 2004; and has yet to be repaired by West Point. This Battery is regularly used by the Department of History and DMI for American history and military instruction. In addition to the Chain Battery being an irreplaceable part of West Point and Revolutionary War history, its damage seriously degrades the educational and military training experience of the Corps of Cadets.

[Photograph by D. R. Cubbison, October 2004]

Section 110 Historic Research and Studies. The CRM staff should continue to perform focused research on one topic per fiscal year. Although a long range project, performance of these various historic studies will significantly enhance knowledge and comprehension of the growth and development of the U.S. Military Academy and West Point community, and will significantly contribute to future National Historic Preservation Act compliance. This effort should be resumed in FY 2012; and continued annually thereafter.

1. Fort Putnam—American Revolution and 1793
2. Second Series Coastal Defense Fortifications
3. Officers' 19th Century Housing and Life (social history)
4. Officers' 20th Century Housing and Life (social history)
5. Enlisted 19th-Century Housing and Life (social history)
6. Enlisted 20th-Century Housing and Life (social history)
7. WPA-Era Military Construction—1930s Expansion
8. WPA/CCC at West Point and Vicinity (1930s)
9. Military Support Buildings—19th Century
10. Buffalo Soldier Field

11. 19th-Century Military Training
12. 20th-Century Military Training Prior to WWII
13. Athletic Fields and Facilities
14. Mining (Iron) and Iron Furnace and Local Communities
15. Local Agriculture and Communities
16. Historic Road Construction at West Point (1778–1940)
17. Quartermaster Operations at West Point
18. German POWs at West Point .

These historic contexts are the foundation for NRHP evaluation and nomination of historic archaeological sites and prehistoric sites.

Fiscal Year 2014.

ICRMP efforts. Upon completion of formal consultation with the Mohawk nation, West Point shall review and revise as appropriate SOP 15 (see Appendix G) for the Unexpected Discovery of Human Remains; and SOP 16-1, Protection of Archaeological or Historical Artifacts (dated September 1995). These two SOPs will be completed, provided to the New York SHPO for consultation, and finalized in FY 2014. In the interim, the two SOPs can be utilized by West Point, as they are presented as an Appendix in this ICRMP.

Archaeological Resources Management Plan. The last Archaeological Resources Management Plan developed for West Point was prepared in 1995. A significant amount of new data has been gathered since that plan was developed that would aid in the improvement of the 1995 predictive models. New procedures have also been adopted to ensure the proper collection and reporting associated with archaeological studies. It is recommended that West Point develop an updated Archaeological Resources Management Plan for the academy. This plan should include the development of new predictive models and archaeological investigation protocols, and establish survey and site testing priorities. This document should provide detailed information regarding the diversity and extent of West Point archaeological resources; research designs for the various periods/site types represented in the archaeological record; protocols for archaeological investigations on post; predictive models to improve the identification of archaeological sensitive areas; and archaeological treatment and mitigation procedures. The management plan should establish Phase I survey priorities and recommendations, Phase II testing priorities, and employ the Historic Map Layer project to identify potential sites. This plan should also address how to successfully integrate the need to assess, locate, identify and manage paleontological resources into the West Point Cultural Resources Management program.

Section 110 Construction. Redoubt Wyllis, and its associated Battery, partially collapsed in 2005 and require reconstruction. The presence of Redoubt Wyllis and its associated Battery immediately adjacent to the Lusk Housing Area constitutes a danger to public health and safety, particularly to family members, West Point visitors, and children. This should be a West Point priority project, with suggested implementation by fiscal year 2013. The *Stabilization and Preservation of Department Of Defense Owned Military Fortifications* (Washington, D.C.: Department of Defense Legacy Resources Management Project 05-239, March 2006) provided design guidance for such a reconstruction.

Section 110 Visual and Aesthetic Considerations: Restoration of Kosciusko Garden, to facilitate its use as a community and cadet resource.

Fiscal Year 2015

Section 110 Construction. Protective roof for Romans Battery Magazine on Constitution Island. DoD Legacy grant funded the restoration of magazine. In 2005 a protective “shed” roof will be necessary to provide permanent protection of the restored site. Suggested implementation by fiscal year 2015.

Section 110 Visual and Aesthetic Considerations: Restoration of Flirtation Walk, from the revitalized community resource of North Dock to Kosciusko Garden, using the previously prepared Cadet First Class study as a starting point.

Section 110 Visual and Aesthetic Considerations: Olmsted Landscape Plan. The famous landscape architect, Frederick Law Olmsted (April 26, 1822 – August 28, 1903) was the most eminent landscape architect in the history of the nation. He designed nationally significant landscapes throughout the nation, such as Central Park and Prospect Park in New York City; and at the U.S. Capitol in Washington, D.C. Olmsted designed a landscape plan in 1911 for West Point, which was never fully implemented. This landscape has never been studied or assessed, although the original Olmsted landscape plan survives at Jefferson Hall, and additional material is available in the Olmsted Papers at the Library of Congress. A comprehensive history of the Olmsted landscape at West Point should be prepared; along with a comprehensive landscape plan intended to develop a new historic landscape for West Point, based upon the landscape intent and approach initially formulated by the 1911 Olmsted Plan, and that is integrated with the overall West Point Historic Landscape Management Plan.

Fiscal Year 2016.

National Historic Landmark District. The West Point NHL District was originally established in 1960, and has not been formally updated and revised since then. Its early designation as a NHL was significant for West Point, but the very early NHL Nomination Form does not reflect the quality and level of analysis expected for a contemporary NHL Nomination. An effort to revise and refine the NHL District was initiated in 2003, but was never completed. In FY 2015, this effort to review and revise, and update, the West Point NHL District should be performed, and carried to completion. Extensive coordination with the National Park Service, as the Federal responsible agency for National Historic Landmarks, will be necessary. It is recommended that this effort be initiated with a detailed coordination meeting with the National Park Service. In the meantime, it is recommended that West Point utilize the revised NHL boundaries and draft nomination form developed under the previous 2003 NHL study effort.

Section 110 Construction. Protective roof for Queensboro Furnace. Restoration of the Queensboro Furnace was performed in 2005, a protective roof should be constructed to provide permanent protection of the site. A Cadet First Class Engineering Project performed in 2005 provides a starting point for the design of this roof. Suggested implementation by fiscal year 2016.

Section 110 Visual and Aesthetic Considerations: An inventory of missed or not previously inventoried and assessed architectural and ornamental elements within the West Point landscape should be performed in FY 2013. This can be done by West Point CRM staff or contract support. These include but are not limited to rock inscriptions, cannon balls, bollards, guard sheds, bus stops, artillery shells, and similar architectural features or objects.

Fiscal Year 2017

Updating the ICRMP. Chapter 6, AR 200-1 directs that ICRMPs be developed to cover a five-year period. Notwithstanding, the ICRMP is also designed to be a “living” document of contemporary and practical use to West Point planners. Consequently, the ICRMP should be reevaluated prior to the five-year review point to determine if it still meets mission requirements or if it should be revised. These instances may include any of the following:

- Mission changes;
- Realignment or closure determinations
- A deficiency identified by an environmental compliance assessment system audit ;
- A number of new resources not covered by the previous plan ;
- New or revised federal statutes or regulations; and
- A change in Department of the Army policy

Other events, such as the adoption of a Programmatic Agreement (PA) or Comprehensive Agreement (CA), can also necessitate the revision of portions of the ICRMP prior to the five-year mark. It is important to note that revisions to portions of the document that affect compliance related procedures including, in particular, procedures for consultation with the New York SHPO must be agreed upon by the New York SHPO and may require a revision to the ICRMP PA. In any event, in FY 2016 the ICRMP will require a mandatory revision.

Section 110 Construction. Battery Meigs and Water Battery stabilization and preservation. Suggested implementation by fiscal year 2016.

Section 110 Visual and Aesthetic Considerations: Restoration of the Ordnance Compound using the recommendations of the 2004 Cadet study and the 2005 HSR for the Ordnance Compound as a starting point.

Future Fiscal Years.

Section 110 Construction. Constitution Island Redoubts 5 and 6 stabilization and preservation. Suggested implementation by fiscal year 2017. The future ICRMP Revision to be performed in FY 2016 should review the status of all West Point nationally significant historic properties, and identify future candidates for Section 110 projects.

Continuous Project Recommendations.

Archaeological Surveys and Sites Management

West Point shall actively continue to identify, evaluate, and manage archaeological properties, and includes continued implementation of the facility “dig-safe” permitting process. West Point shall submit New York Archaeological Site Inventory forms for all newly discovered archaeological sites. This should be included as a requirement for all cultural resources surveys. All forms shall be submitted in an expeditious manner following the completion of field studies (following review and concurrence of the West Point CRM). The West Point CRM should insure that all newly discovered archaeological sites are assigned New York State archaeological site numbers, and are properly recorded on the West Point cultural resources GIS layer and in the cultural resources inventory of the ICRMP.

West Point shall also continue its program to perform Cultural Resources Surveys for the entirety of the installation, for all areas that are available for survey (excluding active impact areas and areas of water such as ponds and lakes). These surveys are being performed as future or anticipated projects are identified. Appendix K provides a list of planned, funded, or conceptual projects through FY 2016. This list should be carefully evaluated, and future Cultural Resources Surveys scheduled for FY 2012-2016 as appropriate. The Archaeological Resources Management Plan to be prepared in FY 2012 should identify future Cultural Resources Survey boundaries and acreage. It should be noted that a number of the earlier surveys, performed prior to 2001, were not performed to contemporary standards, lacked clearly defined boundaries, or were otherwise deficient. The Archaeological Resources Management Plan to be prepared in FY 2012 should also identify the boundaries and acreage for areas that will require re-surveys in the future.

Section 110 Curation of Historic Drawings and Maps. The CRM staff, working with the GIS support staff in DPW, should continue to:

- Digitize all of the historic maps, plans, documents, and records relating to historic properties contained within the DPW archives. These include, in particular, the original Cram, Goodhue & Ferguson drawings;
- This data base should be linked to the GIS data base, and should include copies of all historic, “as built” and modifications/renovation design drawings and plans for each historic structure; and
- Establish a program to coordinate with the West Point Archives & Special Collections, Jefferson Hall to share historic documents in a digital format.

Section 110 Historic Landscape Management. Continued programs that contribute to the enhancement of West Point’s historic landscapes (i.e., vista clearing, restoration of historic planting beds, and retention of open spaces such as the Plain and Buffalo Soldier Field) should be routinely performed by DPW land maintenance and agronomist staff.

Section 110 Historic Research and Studies. The CRM staff should continue to perform focused research on one topic per fiscal year. Although a long range project, performance of these various historic studies will significantly enhance knowledge and comprehension of the growth and development of the U.S. Military Academy and West Point community, and will significantly contribute to future National Historic Preservation Act compliance. This effort should be resumed in FY 2012; and continued annually thereafter.





Chapter Five

Conclusions

The primary mission of the United States Military Academy (USMA) at West Point, New York is to “. . . educate, train, and inspire the Corps of Cadets so that each graduate is a commissioned leader of character committed to the values of Duty, Honor, and Country, professional growth throughout a career as an officer in the United States Army, and a lifetime of selfless service to the nation.” This mission is accomplished through the “West Point Experience,” a four-year cadet program that focuses on intellectual, physical, military, and moral development. The physical environment of the “West Point Experience” is rich in historic buildings, monuments, landscapes, and archaeological ruins and sites which provide daily reminders to the cadets of the traditions, continuity, and sacrifices of the Corps. These resources are vital to the quality of life on post.

The mission of the West Point Cultural Resources Management Program is to:

- Directly support the military mission by defining a sense of culture and heritage that directly impacts unit cohesion, morale, and combat effectiveness. As a result, the historic setting directly benefits the Corps of Cadets;
- Directly support military training by providing a venue for staff rides, tactical studies, and topographical instruction. The Revolutionary War fortifications are used for academic training by the Dean and for military tactics instruction by the Department of Military Instruction (DMI);
- Directly support quality of life for installation residents and military families by maintaining the historic landscapes, architectural standards, and visual aesthetics that significantly contribute to the sense of community and neighborhood on post; and
- Directly contribute to the esprit de corps of the West Point cadets, faculty, civilians, and residents.

This revision to the Integrated Cultural Resources Management Plan (ICRMP) is intended to guide West Point in complying with the various CRM federal preservation requirements and Army regulations.

This is a major, substantive revision to the previous ICRMPs. This revised ICRMP has been divided into two volumes. The first volume is the actual ICRMP, and it provides:

- A Summary of Federal laws and regulations that guide the West Point ICRMP;

- A review of the history and current status of the West Point Cultural Resources Management program; and
- A guideline for the development and execution of the West Point Cultural Resources Management program, immediately in Fiscal Year 2011, and during the five years of the ICRMP (FY 2012 through FY 2016).

This adjustment has resulted in a streamlined ICRMP, which is easier to comprehend in a stand alone format.

The second volume of the revised ICRMP contains all necessary supporting documents for the ICRMP; including:

- A comprehensive historic context for West Point;
- A comprehensive inventory of West Point cultural resources;
- A comprehensive discussion of applicable preservation laws and regulations;
- A comprehensive cultural resources bibliography for West Point; and
- Implementing documents such as cultural resources checklists, SOPs, Programmatic Agreement, and Finding of No Significant Impact.

Since May 2006 the West Point Cultural Resources Management program has experienced considerable turbulence, including a period during which the position of Cultural Resources Manager remained vacant, which resulted in a dilution of focus and priorities of the program. In an effort to address these challenges, West Point initiated a review of the ICRMP in September 2010, to reinvigorate and provide future guidance for the Cultural Resources Management program.

Under Chapter 6, AR 200-1, the Superintendent of the U.S. Military Academy, through delegation to the West Point Garrison Commander, must designate a Cultural Resource Manager to coordinate the facility's CRM program. The CRM provides day-to-day management for cultural resources, ensures that all installation activities are in compliance with applicable cultural resources requirements, serves as coordinator of cultural resources management activities with organizational elements and tenant organizations, and oversees implementation of the ICRMP. Meeting these responsibilities involves:

- Coordinate Section 106 project review for all facility undertakings, including determining if historic properties would be affected by proposed undertakings in consultation with the New York State Historic Preservation Office (SHPO);
- Serve as the Garrison Commander's designee for compliance with all applicable Cultural Resources laws and requirements;
- Notify the Garrison Commander when activities on post do not comply with all applicable laws and requirements in regard to Cultural Resources;
- Coordinate all correspondence with the SHPO;
- Develop and maintain files that document completion of the Section 106 review process or consultation process (including maps, plans, notes, data forms, photographs, memoranda, journal notes, draft and final reports, letters of concurrence/nonconcurrence, PAs, MOAs, and CAs);
- Insure that project managers or project proponents receive copies of Section 106 related correspondence from the SHPO (when appropriate);
- Determine if undertakings are covered under current Programmatic Agreements (PA's);
- Coordinate all Native American and/or public consultation pursuant to compliance with applicable laws or regulations (such as NHPA, NAGPRA, and AIRFA) or the public involvement plan section of this ICRMP;

- Conduct and/or reviewing studies prepared as part of facility's compliance with federal preservation legislation;
- Determine the National Register of Historic Places eligibility of cultural resources in consultation with the SHPO.
- Serve as the point of contact for the SHPO, ACHP, and Native American tribes;
- Participate in the development of MOAs, PAs, and CAs;
- Oversee the proper curation of artifacts recovered from West Point in accordance with 36 CFR § 79;
- Assist ARPA permit applicants;
- Implement a proactive plan to preserve and protect all known archaeological sites (per compliance with ARPA);
- Periodically monitor the condition of known archaeological sites for evidence of vandalism;
- Assist the Superintendent with developing funding priorities for all cultural resources program and compliance activities; and,
- Develop budget requirements for compliance with this ICRMP and applicable PAs and/or MOAs, using the A-106 budgeting process to program these requirements through Army channels.

The Cultural Resource Manager should have the appropriate educational background, skills, and professional training to carry out these program responsibilities.

There are eight components to the West Point cultural resources program:

- Section 106 Compliance;
- Section 110 Compliance;
- Archaeological Resources Management;
- Artifact Curation (36 CFR § 79 Compliance);
- Native American Consultation;
- Architectural Resources Management;
- Aesthetic Resources; and
- Historic Research and Studies.

Since 2001, West Point has been in compliance with Section 106 of the NHPA; and has performed regular and routine consultation with the New York SHPO. The major recommendation of this ICRMP is for West Point to complete the consultation for this new ICRMP and implementing PA, and to ensure that the West Point CRM program is in compliance with the ICRMP and implementing PA NLT the end of FY 2012.

Between 2001 and 2006, the West Point Cultural Resources Management program developed a comprehensive Section 110 compliance program, acknowledged to be one of the finest DOD installation programs. Since 2006, the West Point Section 110 compliance program has been permitted to lapse. The major focus of Chapter Three of this ICRMP is to reinvigorate the West Point Section 110 program, over a period of the next five years. Numerous recommendations are provided to implement the Section 110 program.

During the ICRMP review process, the ICRMP evaluated the current cultural resources layers in the GIS. These cultural resources layers are used as the primary Section 106 planning tool by the current West Point cultural resources and environmental staff. The review indicated that numerous survey areas are either not illustrated, or were incorrect. The majority of the data appeared to have either not been reviewed or updated since 2006. The review team surmised that the problems resulted from the data simply being

entered by the GIS team from the most recent cultural resources surveys, without any cultural resources staff performing a “truth check” or “accuracy check” to confirm that all GIS data was correct, valid, and properly entered into the GIS data base.

Therefore, this ICRMP recommends that a contract be awarded to a professionally qualified archaeological and architectural firm intimately familiar with West Point to perform a comprehensive review of the entire cultural resources GIS layers for accuracy and completeness. Such a review must be performed on an individual site by site, and individual survey by survey, basis. Because of the importance of this GIS layer to effective cultural resources management at West Point, this should be a FY 2012 priority. Detailed components for this expanded and improved GIS database are provided in Appendix L to Volume II of the West Point ICRMP.

The West Point Cultural Resources Management program is generally in compliance with conservation and curation of the West Point archaeological collection. This ICRMP recommends that West Point DPW enter into a Memorandum of Understanding with the West Point Museum to provide for permanent curation of the West Point archeological collection, to remove this responsibility from the CRM program and transfer it to a more appropriate West Point agency.

The current Installation Design Guide, although updated in 2008, does not currently incorporate recommendations from the historic landscape management plan and other cultural resources studies (such as the HSRs). A revised IDG, along with other plans for the future, such as the West Point Master Plan, will provide a unique opportunity to create design standards that are in harmony with the historic environment. Consequently, the CRM should be a part of the revision process. The recommendations and treatment options included in the HLMP should be incorporated into West Point’s IDG. Standardized designs for facility infrastructure such as security devices, bollards, and lighting that are consistent with post aesthetics and sensitive to the historic character of the National Historic Landmark District should also be incorporated.

The last Archaeological Resources Management Plan developed for West Point was prepared in 1995. A significant amount of new data has been gathered since that plan was developed that would aid in the improvement of the 1995 predictive models. New procedures have also been adopted to ensure the proper collection and reporting associated with archaeological studies. It is recommended that West Point develop an updated Archaeological Resources Management Plan for the academy in FY 2013. This plan should also address how to successfully integrate the need to assess, locate, identify and manage paleontological resources into the West Point Cultural Resources Management program.

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Between 2001 and 2006, in response to several cases of looting of valuable archaeological properties, West Point established an effective and aggressive ARPA enforcement program. Since 2006, this ARPA program has unfortunately been permitted to lapse. In FY 2012, immediate efforts should include the Garrison Commander formally appointing a ARPA Enforcement Officer for West Point, and ensuring that the individual receives necessary and appropriate training during 2012. Implementation of the ARPA

enforcement program should begin during the winter of 2012-2013, with field efforts to be initiated in the spring of 2013.

In conclusion, this ICRMP has been significantly revised, and offers the West Point Garrison Commander, DPW Management, and Cultural Resources Management Office with a considerably more effective management plan that will enable West Point to achieve full regulatory compliance with all cultural resources laws and regulations, while permitting the West Point Cultural Resources Management program to make a major contribution to the accomplishment of the West Point mission.

"The provision of the Military Academy Act of 1902, authorizing the enlargement and improvement of West Point...has caused much solicitude to the Department and to the officers of the Army, lest in rearranging and rebuilding a result might be reached out of harmony with the historic traditions of the institution and the beauties of the site."

- Secretary of War Elihu Root, 1902

