



# *Headquarters, U.S. Marine Corps*

Land Use & Military Construction Branch  
Conservation Section

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## **U.S. MARINE CORPS GUIDANCE FOR COMPLETION OF AN INTEGRATED CULTURAL RESOURCES MANAGEMENT PLAN UPDATE**

**FEBRUARY 2009**

## ACRONYMS

ACHP	Advisory Council on Historic Preservation
APE	Area of Potential Effect
ARPA	Archeological Resources Protection Act
CFR	Code of Federal Regulations
CRM	Cultural Resources Manager
DoD	Department of Defense
DoDI	Department of Defense Instruction
GIS	Geographic Information System
HQMC	Headquarters, U.S. Marine Corps
ICRMP	Integrated Cultural Resources Management Plan
MCO	Marine Corps Order
MILCON	Military Construction
MOA	Memorandum of Agreement
MOU	Memorandum of Understanding
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NHL	National Historic Landmark
NHO	Native Hawaiian Organization
NHPA	National Historic Preservation Act
NPS	National Park Service
NRHP	National Register of Historic Places
PA	Programmatic Agreement
POC	Point of Contact
SECNAVINST	Secretary of the Navy Instruction
SHPO	State Historic Preservation Officer
SOP	Standard Operating Procedure

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## **INTRODUCTION**

Internal military statutes and regulations require Integrated Cultural Resources Management Plans (ICRMP), including Department of Defense Instruction (DoDI) 4715.16, *Cultural Resources Management*; Department of Defense (DoD) Measures of Merit; Secretary of the Navy Instruction (SECNAVINST) 4000.35A, *Department of the Navy Cultural Resources Program*; and Marine Corps Order (MCO) 5090.2A (Change 2, Chapter 8). The ICRMP is a multi-year plan that supports the military training mission by identifying compliance actions required by applicable federal laws and regulations concerning cultural resources management.

The mission of the installation cultural resources program is to support the Marine Corps mission, achieve regulatory compliance, and ensure Marine Corps stewardship responsibilities are met. A successful cultural resources program requires projects to identify and evaluate resources, implement protection and compliance actions (such as review of proposed undertakings under Section 106 of the National Historic Preservation Act [NHPA]), and collaborate with internal and external stakeholders to advance awareness and preservation.

## **WHAT IS AN ICRMP?**

The ICRMP is the Commanding Officer's planning and decision document for cultural resources management and specific compliance procedures. It is an internal compliance and management plan that integrates cultural resources program requirements with ongoing mission activities and other planning documents and metrics (for example, installation master plans, training operations plans, and Integrated Natural Resources Management Plans). It identifies potential conflicts between the mission and cultural resources management by analyzing impacts from currently known mission actions and activities, and it identifies compliance actions necessary to maintain the availability of mission-essential properties and acreage.

An ICRMP serves a number of functions:

- Provides an assessment of the health of the installation's cultural resources program
- Provides a summary of known information about cultural resources on the installation and identification of data gaps
- Outlines standard procedures to address common situations relating to cultural resources
- Serves as a toolbox for Cultural Resources Managers (CRM) on how to apply various statutes, regulations, and guidance relating to cultural resources management
- Is an opportunity to address concerns and requirements of internal and external stakeholders
- Serves as a means of public outreach to inform the public on cultural resources present on the installation and enlist support for installation initiatives
- Serves as the institutional memory about the cultural resources program.

## **ANNUAL REVIEWS**

Each year after publication of the initial ICRMP, installations should review the ICRMP internally and contact external stakeholders to note any changes in points of contact (POC), discuss initiatives completed in the past year, and outline projects proposed for the coming year. As part of the annual review, installations should complete a self-assessment of the cultural

resources program performance over the last year and make notes regarding specific successes or challenges. Installations should determine whether the ICRMP needs to be updated because of a change in mission, a substantial increase or decrease in acreage, the identification of new consulting partners (such as new federally recognized tribes), major changes to federal statutes or DoD/Service regulations, or the achievement of a program milestone, such as completion of all Section 110 inventories and evaluations. Installations should consider the following data elements of the ICRMP as part of an annual review:

- POC information
- Results from new surveys and evaluations
- Management changes prompted by new agreement documents
- Archaeological Resources Protection Act (ARPA) violations
- Native American Graves Protection and Repatriation Act (NAGPRA) actions
- Completion of projects outlined in the ICRMP, including any changes to the project list
- Changes in status of resources (for example, demolition of buildings)
- Implementation of any new policies or standard operating procedures (SOP)
- Responses to metrics in DoDI 4715.16 (Enclosure 4).

## **ICRMP UPDATES**

As of the date of publication of this guidance, all Marine Corps installations should have completed their first ICRMP or be actively developing that document. Most of this guidance document focuses on developing ICRMP Updates and significant changes to ICRMP content required by DoDI 4715.16.

The primary focus of ICRMP Update is to assess the health of the installation's cultural resources program. Specifically, were the goals of the original ICRMP met during the period in which it was in effect? It should address questions such as, "What were the goals of the cultural resources program developed as part of the original ICRMP? Did the program meet those goals? If not, why not? What specific cultural resources projects were scheduled for completion during the past 5 years? Of these, which were completed? Why are some projects incomplete?" The answers to these questions "tell the story" of the cultural resources program over the previous period and let stakeholders know what the program was able to accomplish and what remains to be accomplished. The installation can then use this information to tell stakeholders how the results of installation actions and completion of specific projects have informed the program's goals and projects moving forward. A review of annual responses to the new metrics outlined in DoDI 4715.16 (Enclosure 4) will also provide a means of measuring the overall health of the installation cultural resources program.

## **REQUIRED ELEMENTS OF AN ICRMP OR ICRMP UPDATE**

Per DoDI 4715.16 (Enclosure 5), ICRMPs should include—

- Summary of known resources information and a list and brief description of properties listed or eligible for listing in the National Register of Historic Places (NRHP)
- Analysis of data gaps with respect to compliance requirements and Section 110 survey progress

- Identification and prioritization of actions required to implement ICRMP goals and objectives
- Identification of the type and location of actions that may affect cultural resources
- SOPs, provisions, and prescriptions
- Identification of any unique cultural resources issues
- Preservation and mitigation strategies for threatened resources
- Coordination and consultation processes
- Explicit summary of process for integrating the NHPA Section 106 planning process with the National Environmental Policy Act (NEPA) process
- Policies and procedures for curation and repatriation
- Summary of data management process and status (databases, geographic information system [GIS], records management)
- Provisions to address funding priorities and protocols for the specific program requirements listed above
- Procedures to proactively consider the use of innovative mitigation to satisfy the requirements of Section 106 of the NHPA, when feasible and supportive of the mission.

### **SIGNATURE PAGE**

The signature page is where the officers who approve and authorize the ICRMP sign. It is the first section in the document but is the last section to be completed. It is not signed until the ICRMP has gone through all reviews (internal and external) and changes have been incorporated. The officers who *must* sign the ICRMP are the Commanding Officer, Training Officer, and Facility Management Officer.

### **SUMMARY**

The summary is a non-technical summary statement designed to provide a quick overview of the ICRMP. It is a concise statement about the successes and challenges of the cultural resources program over the past 5 years, the status of Section 110 inventories and evaluations, a summary of the numbers and types of cultural resources managed by the installation, and the cultural resources priorities and management actions for the next 5 years.

### **INTRODUCTION**

The ICRMP should include an introductory chapter that describes the purpose of the plan, goals of the installation cultural resource program, organization of the plan, laws and regulations governing cultural resources management, input received from internal and external stakeholders, and roles and responsibilities of internal and external stakeholders. This section should also outline the installation's mission and identify those aspects of the mission most likely to affect cultural resources.

### **Scoping and Review for Preparation of the ICRMP**

All cultural resources will be viewed as having the potential to contribute valuable information to various groups, including the academic community, American Indian tribes (Tribes) or Native Hawaiian organizations (NHO), local historical societies, people whose ancestors settled the area, and many others. Under the NHPA, it is the responsibility of the Marine Corps to consider the effects of its actions on historic properties and to avoid, minimize, or mitigate any impacts that might result from its actions. The Marine Corps has the responsibility to identify and

evaluate cultural resources present within its installations as a proactive measure for planning purposes and to better assess the needs of the resources. External stakeholders, such as the State Historic Preservation Office (SHPO) and Tribes/NHOs, must have an opportunity to participate in the identification and management of the cultural resources at each installation. The general public and other stakeholders should have the opportunity to participate as well.

During the preparation of an ICRMP, information and input should be gathered from installation personnel, agencies, and other stakeholders to determine and resolve issues related to the management of cultural resources within the installation.

Internal stakeholders can include—

- Installation Command staff
- Environmental Office (including Natural Resources and NEPA program staff)
- Facilities and Master Planners
- Maintenance
- Training Operations
- Public Affairs
- Headquarters, U.S. Marine Corps (HQMC) Conservation Section

External stakeholders can include—

- SHPO
- Federally recognized Tribes with ancestral land claims within the installation or treaty rights
- NHOs
- Tenants
- National Park Service (NPS), if the installation manages a National Historic Landmark (NHL)
- Other federal land managing agencies (for example, U.S. Fish and Wildlife, U.S. Forest Service, Bureau of Land Management, Department of Homeland Security) with installation responsibilities.

Specifically, scoping involves contacting all internal and external stakeholders and requesting any new input regarding the ICRMP. Stakeholders should be directed to the previous ICRMP and asked if any POC information has changed, if procedures or policies have been changed, or if the stakeholder has any concerns the previous ICRMP did not address. Installations should allow approximately 30–45 days for this step before preparing the internal draft ICRMP; however, because consultation with stakeholders may be ongoing or completed in conjunction with an annual meeting required under a Programmatic Agreement (PA), preparers should be ready to revisit and update the ICRMP as more input is obtained. Installations should include copies of all scoping and review correspondence in an appendix of the ICRMP.

**Note 1:** The SHPO does *not* need to concur with an ICRMP for it to be implemented. Although the preparation of an ICRMP is a federal undertaking (i.e., uses federal funds) and has the potential to affect historic properties because it establishes management protocols for cultural

resources, most SHPOs do not view ICRMPs as projects requiring their office's review or concurrence under Section 106 of the NHPA.

**Note 2:** Installations do *not* need to implement their ICRMPs through a PA. A PA should not simply state that the installation will comply with the NHPA or that it will follow the procedures outlined in its ICRMP; instead, it should identify certain categories of actions that may be exempt from Section 106 review or actions for which a streamlined review may be accomplished.

### **Roles and Responsibilities**

An ICRMP should include a list of the installation staff responsible for implementing the cultural resources program and the nonmilitary stakeholders that also have responsibilities to the program. The ICRMP should outline the roles and responsibilities for these staff members and stakeholders based on the installation organization. At a minimum, roles identified should include—

- Commanding Officer
- Facilities/Engineers
- Trainers and Operators
- Environmental Office
- CRM
- SHPO
- Tribe or NHO Representative
- Advisory Council on Historic Preservation (ACHP)
- NPS (if the installation has an NHL)
- Tenants.

### **Cultural Resources Laws and Regulations**

At minimum, an ICRMP must include a table listing applicable federal cultural resource laws and regulations as well as DoD cultural resource regulations and guidance. The ICRMP can provide hyperlinks for web pages containing the full language of each citation, or preparers can include copies of specific laws or regulations in an appendix of the ICRMP or on a CD-ROM kept with the ICRMP. Preparers should add a separate section to list or summarize any agreement documents (e.g., PAs, Memoranda of Agreement [MOA], Memoranda of Understanding [MOU], or Special Use Agreements that discuss cultural resources issues) the installation has implemented. An appendix of the ICRMP Update should include copies of these agreement documents.

**Note 3:** Do *not* paraphrase statutes or regulations—cite the appropriate legal reference, excerpt the actual text, or provide a hyperlink. Paraphrasing or summarizing can result in misinterpretation of the intent or procedures of statutes and regulations.

### **HISTORIC CONTEXTS**

An ICRMP should include historic contexts sufficient to assist in the evaluation of cultural resources. If the installation is drawing on regional or state-level contexts published by the SHPO or State Archaeologist, the ICRMP should provide a summary and reference the context documents. Contexts should include an overview of pre-contact, contact, and post-contact history



of the installation and region, as well as a summary of the primary events in the history of the installation (such as how the installation was established and when, major building episodes, major missions, and important people associated with the installation). Developments in the history of the installation should also be looked at in the context of the history of the Marine Corps and unit or command histories.

### **PLANNING LEVEL SURVEY**

A planning level survey is a summary of previous cultural resources investigations conducted within the installation, a summary of any sensitivity assessments or survey priorities developed for either the region or installation, and summaries of identified resources and their evaluation status. The ICRMP should provide information in a combination of text summaries or abstracts from investigation reports and tables of resource-specific data. The main purpose of this chapter is to provide baseline information on the status of Section 110 inventory and evaluation requirements and to identify data gaps or concerns regarding the quality of data from previous investigations. Where appropriate, the ICRMP should summarize information in maps and tables. The ICRMP should provide a summary of the installation's accomplishments to date at the end of the section, followed by responses to the following questions:

- What buildings or structures require evaluation or will require evaluation during the period covered by the ICRMP Update?
- What acreage still requires survey?
- What archaeological sites need to be evaluated or monitored?
- What further efforts (for example, consultation, traditional cultural property surveys, or ethnographic studies) are still required to identify resources of traditional, religious, or cultural significance to Tribes/NHOs?

### **PROGRAM MANAGEMENT**

The purpose of this chapter is to provide a detailed discussion of the status of the cultural resources program since the signing of the original ICRMP and to project the compliance and management activities and projects required to maintain the program for future years.

#### **Program Review and Evaluation**

The development, identification, and implementation of cultural resources management actions are the heart of the ICRMP Update. This section begins with a discussion of the management priorities and actions proposed as part of the implementation of the previous ICRMP, followed by identification of the completed and non-completed actions from the period covered by the ICRMP Update. This section should outline challenges faced in implementing various management actions and highlight successes of the cultural resources program over the past ICRMP period. Finally, this section should reference information in annual reviews, including the installation's responses to the metrics outlined in DoDI 4715.16 (Enclosure 4) and any other annual data calls.

#### **Future Management Actions**

The discussion then moves to cultural resources program actions and projects proposed for the next 5–10 years (use a planning period consistent with that of the installation master plan). Examples of program-level projects include archaeological or historic building surveys and

evaluations, preparation of historic contexts or sensitivity assessments, development of maintenance and treatment plans for a building or historic district, initiation or continuation of American Indian consultation not related to a specific project, development of a GIS cultural resource layer, development of an installation cultural resources training and awareness program, development of agreement documents, or fulfillment of federal curation requirements.

The section ends with a discussion of the actions proposed by other proponents within the installation (e.g., Facility Managers, Trainers, or Tenants) that could affect cultural resources and require review under Section 106 or the NEPA. For each of the actions proposed by other proponents, the ICRMP should include a brief discussion of the cultural resources projects required to support the action, such as consultation with the SHPO, inventories to identify resources within the Area of Potential Effect (APE) for the action, resource evaluations, impact mitigation, initiation of American Indian consultation related to a specific action, or development of agreement documents for a specific action. Examples of actions requiring discussion are military construction (MILCON) projects, equipment changes, mission changes, range management activities, changes in training operations or tempo, and major maintenance or repair initiatives.

To complete this chapter, the preparer needs to know—

- Have any agreement documents (PA or MOA) been negotiated regarding the management of resources at the installation? Are any specific projects or actions required to implement these agreements, such as annual meetings with stakeholders, resource monitoring, or recordation?
- What Section 110 surveys or evaluations are planned?
- What undertakings proposed by the installation will require Section 106 review? Will Section 106 review be integrated with NEPA analysis of the action? Will any of the proposed undertakings require surveys or evaluations? Are any of the proposed undertakings likely to require mitigation of an adverse effect?
- What actions, if any, need to be implemented to ensure appropriate maintenance and repair of historic buildings or structures or protection of known archaeological sites?
- What kind of training will be required for the CRM and any cultural resources program staff? Will any new staff be required?

### **Curation**

The ICRMP should provide the names of any curation facilities where the installation is curating archaeological collections and records recovered from its holdings. It should include information on whether installation collections are being curated per the standards of 36 Code of Federal Regulations (CFR) 79, the types of materials being curated, total cubic feet of collections and linear feet of records, what type of curation agreement is in place with the curation facility, and whether the installation has made annual inspections of its curated collections. If any human remains or funerary items have been repatriated under NAGPRA, the ICRMP should note it here and cross-reference the information with the section on Tribal Consultation or with inventories of repatriated materials in an appendix. Similarly, if the installation has any archaeological collections on display, the preparer should note that fact here and include any loan agreements from the curation facility in an appendix. Finally, the ICRMP should include information relating to installation museums, static displays, and collections of historic records or archives.

**Data Management and Information Restrictions**

The ICRMP should include a description of the installation GIS and how cultural resources data is managed within the GIS. It should also include a statement regarding the confidentiality of resource location information, including a citation of Section 304 of the NHPA and Article 9 of the ARPA. The ICRMP should include a brief discussion of how these security measures are implemented at the installation.

**Training and Outreach**

To enhance the integration of cultural resources issues into the planning process and to improve the manner in which cultural resources support mission, the CRM should provide access to awareness training to facility managers, training staff, field commanders and their units, maintenance staff, and others who may encounter cultural resources. Training subjects can include explanation of SOPs, introduction to cultural resources regulations and management, and identification of cultural resources. Training for non-environmental personnel is crucial to ensure a successful cultural resources management program, compliance with environmental laws and policies, and protection of cultural resources. The CRM should provide a discussion of how training is provided to internal stakeholders and future training goals or initiatives.

Training should include a discussion of how the cultural resources program involves the public and external stakeholders (apart from the SHPO, Tribes, or NHOs) in the management of cultural resources on the installation. Regulation in project-specific cases can drive stakeholder and public involvement and community outreach. Outreach can also be a proactive method of partnering with interested parties to achieve long-range goals and solicit program support. Education can promote awareness of important installation cultural resources projects and the rationale behind them. Actions such as selling a historic building require effective communication to obtain positive support and, perhaps more importantly, to avoid adverse impacts and reactions from various public groups.

**CONSULTATION**

The ICRMP should provide a summary of the status of the consultation program, including which tribes or organizations are considered consulting partners, whether any agreement documents have been negotiated, and outstanding issues that need to be addressed through consultation (other than Section 106 consultations). It should consider discussing any agreement documents negotiated with Tribes or NHOs, outlining procedures for inadvertent discovery under the NAGPRA, and outlining any special concerns, such as repatriation or reburial of human remains or cultural items. The ICRMP should outline any projects or initiatives with respect to consultation that other sections have not addressed, such as outreach to a new consulting party, proposed negotiation of a new agreement document, or planning for an installation tour or event.

The following agencies can provide useful information and guidance on how to identify Tribes or NHOs with interests in the land within the installation and how to consult with these entities under federal statutes and regulations. Representatives from these agencies are also often available to facilitate consultations.

- Bureau of Indian Affairs  
Department of the Interior, 1849 C Street, NW, Washington, DC 20240

<http://www.doi.gov/bia/>

- National Association of Tribal Historic Preservation Officers  
P.O. Box 19189, Washington, DC 20036-9189  
[www.nathpo.org](http://www.nathpo.org)  
Phone: (202) 628-8476  
Fax: (202) 628-2241
- DoD Tribal Liaison Office  
David Sanborn  
[David.Sanborn@osd.mil](mailto:David.Sanborn@osd.mil)

## **SOPs**

An integral part of implementing an ICRMP is communicating cultural resources procedures to internal stakeholders, tenants, and contractors and integrating cultural resources issues into the procedures of other installation programs. The most common form of communication is a set of SOPs. Where possible, an SOP should be streamlined for distribution to stakeholders other than the CRM. SOPs are intended to be standalone documents that can be distributed separately or in a set. Accordingly, the preparer should spell out all acronyms in each SOP. Ideally, topics such as how the installation completes reviews of projects under Section 106 will *not* be included in an SOP.

SOPs should be made available to all personnel, including any tenants, contractors, and occasional users. Preparers should include an overview in the orientation packet for tenants and occasional users and include appropriate SOPs in contracts. SOPs can also be featured on the installation website. Flow charts and procedures for inadvertent discovery can also be included in Trainers' Guides and Users Cards. Another option, particularly for larger installations, is to group the SOPs into a base order relating to cultural resources management. If the installation develops a base order, the ICRMP should include a copy of the base order. Installations should review the base order annually to ensure it reflects current guidance.

## **REFERENCES**

The references include a section listing all references cited in the text of the ICRMP.

## **APPENDICES**

Inclusion of the appendices listed below is strongly encouraged, both to promote the use of the ICRMP as institutional memory for the cultural resources program and to facilitate 5-year updates. For those installations that prefer to streamline the primary text of the ICRMP, chapters such as the planning level survey or historic contexts can be placed into appendices as well. While an ICRMP would also typically include guidance specific to the CRM on how to run different aspects of the program, the CRM Toolbox CD (and subsequent online version) will provide that guidance.

### **Appendix A: Glossary**

Appendix A includes any new terms, as needed.

### **Appendix B: Agreement Documents**

For installations that have negotiated agreement documents or curation agreements, copies of these documents should be included as Appendix B of the ICRMP. This appendix can also include copies of national program alternatives that apply to resources on the installation (for example, the Program Comment for Capehart-Wherry Housing, Program Comment for Unaccompanied Personnel Housing, or Program Comment for Ammunition Storage Facilities).

### **Appendix C: ICRMP Distribution List and POCs**

Appendix C should include the following information:

- POC list
- A list of stakeholders to whom the ICRMP was distributed, if different from the POC list
- Correspondence related to developing and scoping the ICRMP.

### **Appendix D: Annual Reviews and Metrics**

Appendix D should include copies of annual reviews, data calls responses, and annual metrics (as outlined in DoDI 4715.16 [Enclosure 4]) for easy access and review.

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**SAMPLE SOP FOR DISPOSAL OR DEMOLITION OF EXCESS PROPERTY**

**Contact:** <Insert Cultural Resources Manager (CRM) title, phone number, e-mail>

**Scope:** This standard operating procedure (SOP) outlines the steps to be taken before disposal or demolition of federally owned or controlled property that is eligible for listing on the National Register of Historic Places (NRHP) or that needs further evaluation to determine eligibility. It is intended for all personnel. Examples of applicable personnel are—

- Commanding Officer
- Facilities
- Planners
- Installation Maintenance Supervisors and staff
- Trainers and Operators
- Personnel assigned to historic facilities.

**Affected Site(s) or Training Installation(s):** <Add name(s)>

**Statutory Reference(s) and Guidance:**

- National Historic Preservation Act (NHPA) and its implementing regulations (36 Code of Federal Regulations [CFR] 800)
- Programmatic Memorandum of Agreement (MOA) for the Demolition of World War II Temporary Buildings, 7 June 1986
- Executive Order 13327, *Federal Real Property Asset Management*
- Program Comment: Department of Defense (DoD) World War II-Era and Cold War-Era Ammunition Storage Facilities
- Program Comment: DoD Cold War-Era Unaccompanied Personnel Housing.

**Typical Situations:** Building or structure demolition or replacement.

**Typical Triggering Event:** Mission requirement change causing the removal or replacement of historic buildings and structures (see **Figure 1**).

**Procedures:** If mission requirements cause the demolition or excess of a building or structure that is either eligible for listing on the NRHP or has not been evaluated for eligibility, the project proponent should contact the CRM to initiate the Section 106 process. The CRM will request information on alternatives to the demolition or disposal action, such as the potential for using the building for another mission purpose (including renovation or rehabilitation) or the potential for relocating or leasing the building.

If mission requirements cause the demolition and replacement of historic buildings or structures onsite, the replacement design should be compatible with other buildings in the same area. Changes to the landscape should convey the historic pattern of land use, topography, transportation patterns, and spatial relationships.

It is recommended that an economic analysis be conducted before making a decision to demolish or excess a historic building and replace it with new construction. Often, rehabilitation or renovation can be more cost effective. Consult the CRM for guidance. The CRM will also need to initiate compliance with federal regulations. [\*Per Marine Corps Order [MCO] P11000.4

paragraph 2202.3, an economic analysis is required when project costs will exceed \$2 million or if the project costs are more than \$750,000 and will exceed 50 percent of the replacement value of the building].

Compliance procedures can require a minimum of 4–6 months to complete.

**Figure 1. SOP Flowchart  
Disposal or Demolition of Excess Property**

