



United States Department of the Interior

NATIONAL PARK SERVICE

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Washington, DC 20240

Memorandum

To: Kristopher Butcher, Superintendent, Manassas National Battlefield Park (MANA)

From: Kristen Martine, Principal Bureau Archeologist, National Park Service

Subject: Archeological Interest Recommendation, Burial #3 Comb,
Site No. 44PW0301

Purpose.

This memorandum provides factual and contextual information related to a comb recovered from a Civil War era burial (Burial #3) that was excavated and removed from the John Dogan Farm site (Rosefield, or site number 44PW0301) within Manassas National Battlefield Park in 2024. It documents the National Park Service Principal Bureau Archeologist's recommendation regarding the archeological interest of the comb pursuant to 43 CFR § 7.33. Recommendations and facts presented support the Manassas National Battlefield Park Superintendent in their determination of archeological interest.

Background.

Determinations of archeological interest under the Archaeological Resources Protection Act (ARPA). 43 CFR § 7.33 of the Department of the Interior supplemental regulations for implementing ARPA provides a process for determining that certain material remains are not or are no longer of archaeological interest and therefore are not to be considered archaeological resources under ARPA (43 CFR § 7.33(a) and 43 CFR § 7.33(a)(5)). A federal land manager may make such a determination if material remains are not capable of providing scientific or humanistic understandings of past human behavior, cultural adaptation, and related topics (43 CFR § 7.33(b)).

Determinations must follow procedural steps in regulation, and be based on a professional archaeological evaluation of material remains and similar materials within the area under consideration consistent with:

- (1) Secretary of the Interior's (SOI) Standards and Guidelines for Archeology and Historic Preservation ([48 FR 44716](#), Sept. 29, 1983)
- (2) [36 CFR § 60](#), National Register of Historic Places
- (3) [36 CFR § 63](#), Determinations of Eligibility for Inclusion in the National Register of Historic Places
- (4) [36 CFR § 65](#), National Historic Landmarks Program (probably not relevant in this case)

Manassas Battlefield Historic District. The Manassas Battlefield Historic District is listed on the National Register of Historic Places primarily for the area's association with the First and Second Battles of Manassas (July 21, 1861 and August 28-30, 1862, respectively). The National Register District includes 126 contributing buildings, sites, and objects from the period of significance, which begins in 1820 and ends in 1942. The district is listed on the National Register for its contributions to United States history under all four National Register criteria of significance as summarized below.

Criterion A: The First and Second Battles of Manassas (both pivotal Civil War events) occurred within the district, and so it is a location associated with important events in United States history.

Criterion B: The First and Second Battles of Manassas are where Brigadier General Thomas J. Jackson and Robert E. Lee gained prominence as Confederate Civil War leaders, and so the district is associated with persons that made important contributions to United States history.

Criterion C: Many buildings within the district were occupied by soldiers during the First and Second Battles of Manassas and also embody “the architectural evolution of the rural area before and after the war” (Trieschmann 2005, p. 49). These structures illustrate Federal architecture and a vernacular landscape between 1780 and 1820.

Criterion D: Contributing features of the district have yielded or have the potential to yield information important to the general history of the area during the period of significance. Specifically, “the [district] is significant as the hallowed ground of the two Manassas battles, housing artifacts of the devastating engagements, entrenchments, encampments and burial sites” (Trieschmann 2005, p. 50).

The battlefield retains integrity of location, setting, feeling and association.

Civil War Burials and Amputation Pit. A subterranean pit containing three sets of human remains and 16 amputated limbs was discovered near a building at the John Dogan Farm Site, a contributing element to the Manassas Battlefield Historic District, in 2014. These remains were removed in 2014 and 2024. Union soldiers occupied this property on August 29th, 1862 during the Second Battle of Manassas, first using it as an artillery placement site, and later as a field hospital after surgeons “took control of the house” for use as a field hospital for the remainder of the three-day battle. The duration of field hospital use is unknown, but Army medical records indicate that the house served as “one of Union Medical Director Thomas A McParlin’s regimental hospital or dressing stations from September 1 to 6” (Bedell 2024, p. 8). The subterranean pit containing human remains is thought to have served as an area where amputated limbs and deceased individuals were interred during this event.

Burial #3 and the Comb – Burial #3, a 40% intact set of human remains, was recovered from the subterranean pit during excavations in 2024. This individual was slight in stature and between 16 and 19 years old at the time of death, which likely resulted from the “lead artillery case shot ball recovered from the neck area” (Bedell 2024, p. D-3 through D-5). NPS museum collections catalog records list the following items as accompanying Burial #3: 24 military buttons, a jacket/clothing eyehook, artillery shot, 9 generic clothing buttons, and a comb. The age, location, assumed internment date, and items buried with the individual indicate that Burial #3 was a male Union Soldier. A recommendation regarding the archeological interest of Burial #3 is summarized in a memo dated September 26, 2025, and is not reiterated here.

The hard rubber pocket comb associated with Burial #3 was found under the soldier’s left femur during the 2024 excavations. The excavation report asserts that the comb “had presumably been in his [the soldier’s] back pocket” (Bedell 2024, p. 29). An artifact inventory in this report describes the comb as “personal,” black, machine made, and undecorated (Bedell 2024, Appendix A, p. 7). The comb has been accessioned into NPS collections under catalog number MANA 71379.

Documentation. The comb found with Burial #3 has been fully documented. In addition to a narrative description and photographic documentation, the comb underwent high-resolution 3D scanning at Virginia Commonwealth University’s Virtual Curation Laboratory on May 18, 2026. Several 3D replicas were created and will be stored at the NPS repository for MANA along with associated digital files. All records and replicas will be maintained and made available for future research and public interpretation.

Archeological Interest Evaluation and Recommendations.

Summary of Evaluation. Recommendations in this memo are based on a professional archeological evaluation conducted by National Capital Region Archeologist Dr. Joshua Torres as documented in a memorandum dated June 24, 2026, NPS museum collections records, and supplemental reference material. Assessment of the comb's archeological interest was guided by the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation (48 FR 44716, Sept. 29, 1983) and 36 CFR parts 60, 63, and 65. All recommendations are based on information available at the time the assessment was completed.

National Register Significance. The comb has been evaluated against the National Register of Historic Places significance criteria applicable to the Manassas Battlefield Historic District. The district is listed on the National Register for its contributions to United States history under all four National Register criteria. The comb itself does not meet eligibility thresholds as a contributing element to the district. The rationale for this conclusion is briefly summarized below.

Criterion A: The comb does not provide information pertinent to military movements or tactical decisions related to the First and Second Battles of Manassas and therefore does not contribute substantively to the broad patterns of United States history.

Criterion B: The comb is not associated with Brigadier General Thomas J. Jackson and Robert E. Lee, and so does not illustrate the lives of persons significant in United States history.

Criterion C: The comb does not embody the distinctive characteristics of Federal architecture or the vernacular landscape during the period of significance.

Criterion D: The comb, a mass-produced, standard personal utility item common during the Civil War era, has not and does not have the potential to yield information important to the Second Battle of Manassas. It carries no unique diagnostic data regarding military unit identity.

The comb was also evaluated individually against National Register criterion C and D as an object. As noted above, it is a common, mass-produced, hard rubber comb with no distinguishing features or characteristics. It does not represent a distinctive type, material, or method of construction/manufacture. The artifact has been subjected to high-resolution 3D scanning, physical replication, and photography, and that information will be stored by the NPS and made available for research and interpretation. The potential for extracting additional information from the object is low.

Because the comb does not meet National Register criteria significance thresholds, a discussion of the object's physical or contextual integrity is not pertinent to this assessment.

Assessment of Archeological Interest. The comb removed from the John Dogan Farm Site amputation pit in association with Burial #3 in 2024 does not contribute to any of the four significance criteria supporting the National Register-listed Manassas Battlefield Historic District. The comb is also not eligible for National Register listing individually, as it is a common, mass-produced object that lacks distinctive features or characteristics.

The facts presented establish that the comb found with Burial #3 is not capable of contributing additional information that would further scientific or humanistic understandings of past human behavior, cultural adaptation, and related topics. Accordingly, the NPS Principal Bureau Archeologist recommends that the federal land manager determine that the comb does not have archeological interest and does not warrant management as an archeological resource under ARPA.

References

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Andrus, Patrick W. *National Register Bulletin. Guidelines for Identifying, Evaluating, and Registering America’s Historic Battlefields.* U.S. Department of the Interior, National Park Service. National Register, History and Education. 1999.

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