



**DEPARTMENT OF VETERANS AFFAIRS**  
**NATIONAL CEMETERY ADMINISTRATION**  
**WASHINGTON DC 20420**

**Section 106 Consultation Update (Case #20-2276)**  
**Fort Douglas Post Cemetery, Utah**  
**Headstone for German POW Paul Eilert**

March 8, 2022

In December 2020, the National Cemetery Administration (NCA) and the State of Utah agreed that the privately provided headstone on the grave of German POW Paul Eilert was an historic object that was best retained in situ. NCA then engaged with a professional conservator to obscure the shallow swastika contained in the 1939 Iron Cross as it is inscribed on the headstone face. Application of a “plastic infill” – a common and reversible technique considered a best practice – was the agreed upon alternative allowing the historic headstone to remain while obscuring the offensive symbol. Per the National Historic Preservation Act (NHPA) Section 106 consultation process, there would be no adverse effect on the historic Fort Douglas Post Cemetery.

On November 2, 2021, a qualified conservator under contract to NCA completed the infill material installation. Sadly, during that night, a vandal removed the treatment in progress. The conservator discovered the damage the following morning, and NCA reported the crime to area police forces.

In light of the vandalism and the probability of future occurrences, NCA re-initiated the Section 106 consultation process to remove the private headstone and replace it with a standard historically appropriate government-furnished headstone. Consistent with other POW graves, the inscription includes only the name, “German,” and date of death. The original historic private headstone of Paul Eilert will be retained in the NCA History Collection for study and potential exhibit in the future.



Government-issued headstone (*left*) that replaced the original privately purchased headstone (*right*) in March 2022.