National Park Service

NPS- 28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

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CONTENTS

INTRODUCTION
Cultural Resource Management 1
- Research 1
- Planning 1
- Stewardship 2

Purposes and Goals of This Guideline 2
Organization of the Guideline 3
Resource Types and Interdisciplinary Involvement 3
Standards 4
Implementation of the Guideline 4

Chapter 1: FUNDAMENTAL CONCEPTS OF CULTURAL RESOURCE MANAGEMENT 5
Introduction 5
- The Cultural Connection 5
- Parks and Cultural Resources 6
- Cultural Resource Management 6

Types of Cultural Resources 7
- Notes on Resource Categorization 7
- NPS Resource Types 8

The Nature of Cultural Resources 9
- Significance 9
- Associations 9
- Integrity 10

Essentials of a Comprehensive Program 11
- Objectives of Cultural Resource Management 11
- Research 11
- Planning 12
- Stewardship 12

Program Dynamics 13
- The Process and the Cycle 13
- The Human Factor 14
- Decision-Making 14
- A Living Legacy 15

Chapter 2: RESEARCH 17
Research Methodology 17
- Task Directive 17
- Research Design 19
- Documentary Research 19
- Field Investigations 19
- Report 20

Resource Identification, Evaluation, and Registration 21
Service-wide Inventories of Cultural Resources 22
- Cultural Landscapes Inventory (CLI) 22
- Cultural Sites Inventory (CSI)–Archeology and Ethnography

(under development) 23
List of Classified Structures (LCS) 23
National Catalog of Museum Objects 23
National Register of Historic Places 23
Procedures for Established Areas 24
Baseline Research Reports 24
Archeological Overview and Assessment 25
Archeological Identification/Evaluation Studies 25
Ethnographic Overview and Assessment 25
Cultural Affiliation Studies 25
Historic Resource Study (HRS) 25
Cultural Resources Base Map 26
Park Administrative History 26
Rapid Ethnographic Assessment Project (REAP) 26
Scope of Collection Statement 26
Abbreviated and Specific Resource Studies 27
Physical Documentation and Material Analysis 28
Qualifications of Researchers 28
Funding and Staffing 29
Checklist for Research 30

Chapter 3: PLANNING 31
The Planning Process 31
Planning Scopes 32
Resources Management Plans 34
Planning and Cultural Resource Considerations 35
Archeological Resources 36
Cultural Landscapes 36
Historic and Prehistoric Structures 37
Museum Objects 37
Ethnographic Resources 38
Checklist for Planning 40

Chapter 4: STEWARDSHIP 41
Visitor Experience 41
Interpretation 42
Accessibility 42
Facilities 43
Park Design 43
Maintenance Management, ICAP, and Preservation Maintenance 43
Energy Conservation and Historic Preservation 45
Commemorative Works and Plaques 45
Protection 46
Safety 46
Physical Security 47
Law Enforcement 47
Archeological Resources Protection Act and Antiquities Act 47
Emergency Management 48
Land Acquisition and Management 48
Pest Management 49
Fire Management 49
Structural Fire 49
Wildland and Prescribed Fires 50
Administration 50
Budget 50
Personnel 51
Recruitment 51
Training 52

Chapter 5: COMPLIANCE WITH SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT 53
Section 106 of the National Historic Preservation Act 53
Section 110 of the National Historic Preservation Act 54
Responsibilities of the Superintendent 55
Responsibilities of the Field Director 56
When to Initiate Consultation 56
The Regulatory Section 106 Compliance Process 57
Identifying Historic Properties (36 CFR 800.4) 57
    Assessing Effects (800.5) 59
Finding of No Effect 60
Finding of No Adverse Effect 60
Finding of Adverse Effect 60
    Consultation (800.5[e]) 61
    Advisory Council Comment 61
    Groups of Undertakings and Programmatic Agreements 61
1995 Servicewide Programmatic Agreement 62
Programmatic Exclusions (Stipulation IV) 62
    Planning (Stipulation VI) 63
    Cooperation and Communication (Stipulation IX) 64
Checklist for Park Section 106 Compliance 65

Chapter 6: MANAGEMENT OF ARCHEOLOGICAL RESOURCES 67
Introduction and Objectives 67
Types of Archeological Resources 67
Program Objectives 68
Research 71
Project Development 71
Work Plans and Research Design 71
Permit Requirements 72
Consultation Requirements 72
    Identification and Evaluation 73
Systemwide Archeological Inventory Program 73
Cluster-wide Archeological Inventory Plan 73
Archeological Overview and Assessment 74
Archeological Identification Study 74
Archeological Evaluation Study 75
Archeological Databases 76
Confidentiality of Information 77
Archeological Data Recovery Studies 78
Disposition of Archeological Collections 78
Planning 79
    Relationship to Park Planning Documents 79
General Management Plan 79
Resources Management Plan 79
Development Concept Plan 80
Interpretive Prospectus 80
Other Park Plans 80
    Relationship to Other Cultural Resources 80
Museum Collections 81
Historic and Prehistoric Sites and Structures 81
Cultural Landscapes 81
Ethnographic Resources 82
    Use of Archeological Resources 82
Research Uses 82
Interpretive Uses 83
    Section 106 and NEPA Compliance 83
    Funding and Staffing 83
Stewardship 84
Treatment 84
Preservation 84

Rehabilitation, Restoration, and Reconstruction 85
Protection 85
Checklist for Management of Archeological Resources 86

Chapter 7: MANAGEMENT OF CULTURAL LANDSCAPES 87
Introduction and Objectives 87
Introduction 87
Program Objectives 87
Cultural Landscape Categories 88
Research 89Identification 89
Documentation, Evaluation, and Registration 90
Documentation 90
Significance 90
Integrity 90
National Register Nominations 90
Cultural Landscapes Inventory 91
Cultural Landscape Report 91
Planning 94
Relationship to Park Plans 94
Decisions About Treatment 94
Compliance 95
Use 96
Funding and Staffing 96
Stewardship 96
General Treatment 96
Preservation 98
Rehabilitation 100
Restoration 101
Reconstruction 102
Biotic Systems Treatment 103
Specimen Plant Management 104
Vegetation Systems Management 105
Pest Management 105
Endangered Species 106
Inventory and Condition Assessment Program (ICAP) 106
Partnerships 106
Acquisition of Lands and Interests 107
Leases and Agreements 107
Adjacent Lands 107
Destruction or Neglect of Cultural Landscapes 108
Special Issues 108
Cemeteries 108
Circulation Systems 109
Earthworks 110
Monuments, Memorials, and Landscape Remnants 110
Checklist for Management of Cultural Landscapes 111

Chapter 8: MANAGEMENT OF HISTORIC AND PREHISTORIC STRUCTURES 113
Introduction 113
Resource Definition 113
Program Objectives 113
Research 114
dentification, Evaluation, and Registration 114
Historic Resource Study 114
National Register Nominations 115
List of Classified Structures 115
Categories of Significance 115
Documentation and Investigation 116
Historic Structure Report 116
Graphic Documentation 119
Archival Considerations 120

Planning 120
Treatment Planning 120
Ultimate Treatment 121
Historic Property Preservation Database (HPPD) 122
Removal or Neglect 122
Use of Historic Structures 122
Park Housing 123
Museums 123
Commemorative Works and Plaques 123
    Codes, Regulations, and Contemporary Development 124
Design Compatibility 124
Accessibility 124
Safety and Security 125
Energy Conservation 125
    Administrative Issues 125
Compliance 125
Funding and Staffing 126
Construction Documents 126
Stewardship 127
Treatment and Use 127
Preservation 128
Rehabilitation 129
Restoration 131
Reconstruction 132
    Monitoring and Inspections 133
    Protection 133
    Partnerships 133
Leasing 134
Special Use Permits 134
Cooperative Agreements 134
Concession Agreements 134
Conveyance 135
Checklist for Management of Historic and Prehistoric Structures 136

Chapter 9: MANAGEMENT OF MUSEUM OBJECTS 137
Introduction and Objectives 137
Types of Museum Collections 138
Library Materials 142
Program Objectives 142
Research 143
Scope of Collections 143
    Acquisition 143
    Documentation 144
Accessioning 144
Cataloging 144
    Research Use of Collections 145
    Interpretive Uses of Collections 145
    Outgoing Loans 145
Deaccessioning 146
Planning 147
Park Planning 147
    Collection Management Planning 147
Collection Management Plan 147
Collection Storage Plan 148
Collection Condition Survey 148
Exhibit Plan and Design 148
Historic Furnishings Report 149
Relationship to Historic Structures 149
Submissions to Cultural Resources Management Bibliography 149
Stewardship 150
Protection of Museum Objects 150
    Preservation of Museum Objects 150

Preventive Conservation 150
Conservation Treatment 151
Accounting for Museum Objects 151
Annual Physical Inventory 151
Collections Management Report 152
Assessment of Conditions 152
Consumptive Use of Museum Objects 152
Historic Furnishings 154
Staffing and Funding 155
Checklist for Management of Museum Objects 156

Chapter 10: MANAGEMENT OF ETHNOGRAPHIC RESOURCES 157
Overview and Introduction 157
The Park Applied Ethnography Program 157
Need for Ethnographic Technical Assistance and Data 158
Traditionally Associated Groups and Resource Uses 158
Traditional Ethnographic Cultural and Natural Resources 160
Identifying Ethnographic Resource Boundaries 161
Ethnographic Resource Types 161
Ethnography's Interdisciplinary Role 162
Research 163
Principles of Ethnographic Research 163
Collaboration 163
Research Conduct, Confidentiality, and Information Management 164
Methodologies 165
Ethnographic Research Types 166
Ethnographic Overview and Assessment 166
Traditional Use Study 166
Rapid Ethnographic Assessment Project (REAP) 167
Ethnographic Landscape Study 167
Cultural Affiliation and Lineal Descent Studies 167
PPENDIX A: Ethnohistory 167
Ethnographic Oral and Life Histories 168
Ethnographic Resources Inventory (ERI) 168
Planning and Program Strategies 168
Park Ethnographic Program Strategy 168
General Management Plans and Special Resource Studies 170
Stewardship 170
Parks, Resource Integrity, and Viable Cultural Systems 170
Notification 171
Consultation 171
Compliance 172
NAGPRA 173
Treatment 173
Protection 173
Registration 174
Use 174
Education 174
Community Partnerships 175
Checklist for Management of Ethnographic Resources 176

APPENDIXES

Appendix A: Glossary 177

Appendix B: Laws, Regulations, and Orders 191

Appendix C: Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation 197

Appendix D: Distribution/Availability of Final Cultural Resource Reports 231

Appendix E: Qualification Standards and Selective or Quality Ranking Factors for Cultural Resource Specialists 235

Appendix F: Selected Management Bibliography 239

Appendix G: Advisory Council on Historic Preservation Technical Bibliography 241

Appendix H: National Register Technical Bibliography 245

Appendix I: Selected History and Historical Interpretation Bibliography 249

Appendix J: Archeology Bibliography 251

Appendix K: Selected Cultural Landscape Bibliography 255

Appendix L: Historic and Prehistoric Structure Technical Bibliography 259

Appendix M: Museum Objects Technical Bibliography 279

Appendix N: Selected Ethnographic Resources Bibliography 283

Appendix O: Model Section 106 Form 287

Appendix P: 1995 Servicewide Programmatic Agreement 295

Appendix Q: Preparing National Register Forms 309

Appendix R: NAGPRA Compliance 319

INDEX 341

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INTRODUCTION

A. Cultural Resource Management

As custodian of the national park system, the National Park Service is steward of many of America's most important natural and cultural resources. It is charged to preserve them unimpaired for the enjoyment of present and future generations. If they are degraded or lost, so is the parks' reason for being.

Almost every park in the system has cultural resources, the material evidence of past human activities. Finite and nonrenewable, these tangible resources begin to deteriorate almost from the moment of their creation. Once gone they cannot be recovered. In keeping with the NPS organic act of 1916 and varied historic preservation laws, park management activities must reflect awareness of the irreplaceable nature of these material resources.

Cultural resource management involves *research*, to identify, evaluate, document, register, and establish other basic information about cultural resources; *planning*, to ensure that this information is well integrated into management processes for making decisions and setting priorities; and *stewardship*, under which planning decisions are carried out and resources are preserved, protected, and interpreted to the public.

1. Research

Research for identification, evaluation, documentation, and full understanding and interpretation of cultural resources is essential to informed decision-making for park planning and operations, including maintenance and visitor services. Without basic inventory data and research on resources, park planning processes cannot provide for their protection.

The NPS is responsible for identifying and planning for the protection of cultural resources significant at the local, state, and national levels, whether or not they relate to the specific authorizing legislation or interpretive programs of the parks in which they lie. Even where natural or recreational resources are the primary reason for a park's establishment, cultural resources must be identified, evaluated, understood in their cultural contexts, and managed in light of their values.

2. Planning

Among other things, effective cultural resource management serves to (1) integrate cultural resource concerns into other park planning and management processes, (2) avoid or minimize adverse effects on cultural resources, (3) provide information for interpretation and public understanding, and (4) identify the most appropriate uses for cultural resources and determine their ultimate treatment (preservation, rehabilitation, restoration, etc.), through processes that include involvement by groups with cultural or religious ties to park resources.

Park plans involving cultural resources should be prepared and reviewed in interdisciplinary efforts that include planners, cultural resource specialists in relevant disciplines, and representatives of state historic preservation offices, local governments, associated Native American groups, and other interested parties.

Parks are part of larger cultural environments. Social and economic trends outside park boundaries can profoundly affect the Service's ability to manage and protect park resources, and not all cultural resources

related to a park may be within its boundaries. NPS staffs should seek to participate actively in the planning processes of neighboring jurisdictions and organizations, including other governmental agencies, Native American governing bodies, and local associations. In turn, representatives of these groups should be asked to participate in park planning processes.

3. Stewardship

The NPS *Management Policies* requires that "pending planning decisions, all cultural resources will be protected and preserved in their existing conditions." In reaching decisions about resource treatment, moreover, preservation should always receive first consideration. Data recovery, rehabilitation, restoration, and reconstruction may sometimes serve legitimate management purposes. However, these treatments cannot add to and will likely subtract from the finite material, and sometimes even data sources, remaining from the past. Decisions about them should be based on awareness of long-range preservation goals and the interests and concerns of traditionally associated groups.

The Advisory Board on National Parks, Historic Sites, Buildings, and Monuments declared in 1936, "It is well to bear in mind the saying: `Better preserve than repair, better repair than restore, better restore than [re]construct.'" As a corollary it noted, "It is ordinarily better to retain genuine old work of several periods, rather than arbitrarily to `restore' the whole, by new work, to its aspect at a single period." Internationally accepted historic preservation standards continue to stress the protection and perpetuation of authentic surviving resources.

B. Purposes and Goals of This Guideline

Authority for cultural resource management activities derives from a variety of laws, outlined in Appendix B, including the 1916 NPS organic act. Also fundamental are the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. The NPS *Management Policies* states basic principles governing the management of cultural resources in the national park system, consistent with law and the Secretary's Standards. This guideline, succeeding others of the same title that were designated NPS-28 in the previous NPS directives system, elaborates on these policies and standards and offers guidance in applying them to establish, maintain, and refine park cultural resource programs.

This guideline is intended to aid managers, planners, staff, and cultural resource specialists. Like Release No. 4 of the guideline, it places greater emphasis than earlier versions on the needs of park managers and staff and non-specialists. It outlines the basic principles and ingredients of a good park program. Changes reflecting the 1995 NPS reorganization constitute most of its differences from Release No. 4.

Specialized and technical information for specific program areas will continue to grow. Therefore, this guideline also serves to refer users to the variety of technical manuals, handbooks, and other sources of such information. Each chapter and Appendixes F through N cite useful sources. Other supplementary technical guidance, largely in handbook or manual formats, is planned or in development. This basic "tool kit" of technical information will continue to grow and evolve, and users are encouraged to contribute their advice and recommendations to this process.

C. Organization of the Guideline

The first five chapters are broadly applicable to all cultural resource programs. Chapter 1 is an overview of the fundamental concepts that shape the guidance provided in subsequent chapters. It is an introduction to cultural resource management for those new to the field and for non-specialists. Chapters 2, 3, and 4 treat the broad program functions of research, planning, and stewardship as they apply to all cultural resource types. They outline the overall shape and content of a park cultural resource management program and describe how park planning and management operations relate to cultural resources. Chapter 5 discusses compliance with Section 106 of the National Historic Preservation Act as a planning and operations function. The remaining chapters focus on aspects of cultural resource management related specifically to the major resource types recognized in the *Management Policies*: archeological resources, cultural landscapes, structures, museum objects, and ethnographic resources. Each chapter provides additional guidance for research, planning, and stewardship.

D. Resource Types and Interdisciplinary Involvement

The resource types in the *Management Policies* relate to certain cultural resource disciplines. Although each type is most closely associated with a particular discipline, an interdisciplinary approach is often necessary to properly evaluate and document particular resources. The Secretary's Standards encourage interdisciplinary collaboration by setting forth standard processes for preservation planning, identification, evaluation, and registration that apply to all cultural resource types. Thus, for example, historians, historical architects, archeologists, and historical landscape architects can all participate in a single survey to identify both historic structures and cultural landscapes. These resource types can be evaluated and documented in a single historic resource study, thereby increasing the study's effectiveness.

The resource types in the *Management Policies* and this guideline have been adapted for management purposes from the categories used for listing properties in the National Register of Historic Places: building, district, site, structure, and object. A cultural landscape might include buildings, structures, and objects and be listed in the National Register as either a site or a district. Archeological resources may be listed in all National Register categories. National Register documentation often needs to reflect a multidisciplinary approach to resource evaluation.

E. Standards

The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation provide all federal agencies, state historic preservation officers, and other organizations with guiding principles for archeological and historic preservation activities and methods. These standards and guidelines, consistent with the Venice Charter and other internationally accepted preservation principles and standards, appear in their entirety in Appendix C. They deal with preservation planning; identification, evaluation, and registration of cultural resources; historical, architectural, engineering, and archeological documentation; and treatment of historic properties.

All cultural resource management activities in parks are subject to the Secretary's Standards. The park management standards–gauges of satisfactory accomplishment–that appear throughout this guideline are fully consistent with the Secretary's Standards. Any differences in language are to clarify or elaborate on how the Secretary's Standards apply in park management. While the Secretary's Standards do not cover every aspect of park management addressed in this guideline, they are governing principles in all areas they do cover.

F. Implementation of the Guideline

This guideline is a major management tool, but it is only one part of a process that involves each individual who manages or cares for park cultural resources. Integration of preservation concerns into park operations and management requires understanding of the unique needs of specific resources, both in daily activities and in long-range planning. Only the leadership of park managers and the commitment of individual employees will ensure good cultural resource management and preservation.

CHAPTER 1: FUNDAMENTAL CONCEPTS OF CULTURAL RESOURCE MANAGEMENT

A. Introduction

1. The Cultural Connection

Cultural resources may be cherished for their beauty or utility or a host of other reasons. But it is the ability to connect one generation to another that gives them their most valued attribute: an inherent capacity to mold and reinforce our identities as social creatures. Of course, the shaping and guiding of human lives involves much more than cultural resources; it embraces the entire cultural system into which each person is born and within which each must grow and work, love and die. Cultural resources are both a part of and representative of these systems. In concert with lesson plan and sacred ritual, recreational play and family vacation, cultural resources bring people together with the values and ideas that are necessary for success in contemporary society.

Cultural resources constitute a unique medium through which all people, regardless of background, can see themselves and the rest of the world from a new point of view. Access to cultural resources means that people can learn not only about their own immediate ancestors but about other traditions as well. New citizens can discover for themselves how earlier immigrants became Americans; descendants of African, Asian, and European ancestors can discover unexpected commonalities; and all of us can come to better appreciate the great saga of Native American history. Such an exchange offers every American a place of importance in the history of our country as well as an opportunity to meet others and be met in a spirit of mutual tolerance, appreciation, and respect.

A primary responsibility of the National Park Service is to identify, protect, and share the cultural resources under its jurisdiction. The work inherent in this endeavor is varied and challenging. First, there must be systematic, open-minded study by archeologists, historians, and other specialists to locate resources and to discover or substantiate their significance. Second, considerable thought must be given to the problem of simultaneously protecting park resources and making them available to the public. Third, appropriate treatment programs and protective measures must be put into effect.

This chapter will provide an overview of these management activities and explore the nature of cultural resources. Much of the discussion is focused on the physical aspects of resources: on the empirical link between the substance of a resource and its historical or ethnographic associations, on threats that could cause a resource to degrade or deteriorate, on defining and allowing appropriate use and enjoyment of the resource. Important as these issues are, they are but support for a larger concern: to enhance individual lives within the framework of a culturally diverse American society. As such, cultural resources are not valuable in and of themselves; they are to be treasured for the connections they provide between people and cultural traditions, between people and the world at large.

2. Parks and Cultural Resources

American history is well represented in the national park system. Although political and military themes have predominated, the parks' historical associations range from aboriginal settlement of the Western Hemisphere to the initiation of powered flight; they stretch from European exploration of the New World to the struggle for voting rights; they encompass the serenity of a poet's garden and the sweeping grandeur of a ridgetop parkway. Many park resources are the physical remains of this heritage. They are clay pots buried deep in the earth and brick forts guarding harbor entrances, quill-penned script on yellow parchment and smoke-belching locomotives, fragrant gardens and streets lined with tall wooden houses. These resources are unmistakable evidence of earlier lives–a common inheritance from past generations with whom we have shared this land.

The National Park Service is also steward of places, objects, and records important in perpetuating specific ethnic traditions. Such resources include vision quest sites and evangelical churches, feathered headdresses and hand-forged farm tools, oral histories and salmon-filled rivers. When used by their associated ethnic groups, these types of resources help underpin entire cultural systems. Resource management sensitive to the rights and interests of these groups, especially Native Americans, can help perpetuate if not strengthen traditional activities such as subsistence, language use, religious practice, and aesthetic expression. In this context, cultural resource management extends beyond concern with tangible resources to recognition and accommodation of cultural processes.

This connection between parks and cultural resources is well established in federal law. The act of 1916 by which Congress created the National Park Service clearly mandated the bureau to allow for public enjoyment of cultural resources while ensuring their protection. Over the years the federal government has enhanced and supported this role through repeated affirmation that cultural resources are a matter of national interest. Building on the 1906 Antiquities Act and the Historic Sites Act of 1935, this message was clearly spelled out in the National Historic Preservation Act of 1966 and its amendments, it was reiterated in the Archaeological Resources Protection Act of 1979, and it was reinforced by the Native American Graves Protection and Repatriation Act of 1990. Although each of these acts has its own focus and orientation, collectively they require a comprehensive, multicultural approach to managing cultural resources in national parks.

3. Cultural Resource Management

The physical attributes of cultural resources are, with few exceptions, nonrenewable. Once the historic fabric of a monument is gone, nothing can bring back its authenticity; once the objects in an archeological site are disturbed, nothing can recover the information that might have been gained through analysis of their spatial relationships. The primary concern of cultural resource management, therefore, is to minimize the loss or degradation of culturally significant material. Closely related issues include compatibility between cultural resources and new development; consideration of visitor needs, especially those of special populations; incorporation of sustainable design principles in resource protection strategies; and support for the interpretation of park resources, both natural and cultural.

Straightforward as these concerns are, translating them into a management program is anything but simple. Contributing to this complexity are a legally mandated review process, staff trained in diverse academic disciplines, limited funds, and a shortage of trained personnel. In spite of these conditions, cultural resource management can be largely understood in terms of three basic questions that must be asked about all cultural resources. How is a cultural resource identified and what makes a resource significant? What should be done to properly care for a cultural resource? How do cultural resources fit into the overall scheme of park management?

In the past, these questions have usually been answered in the context of specific academic disciplines, such as architecture or museology. But when park managers and cultural resource specialists talk about cultural resource issues or when NPS staff meet with state historic preservation officers, their discussions would undoubtedly benefit from a common understanding of the program as a whole. The discussion in this chapter provides such an overview by linking cultural resource management with park operations and by presenting the full range of cultural resources in terms of their common denominators.

B. Types of Cultural Resources

1. Notes on Resource Categorization

The National Historic Preservation Act recognizes five property types: districts, sites, buildings, structures, and objects. As called for in the act, these categories are used in the National Register of Historic Places, the preeminent reference for properties worthy of preservation in the United States. To focus attention on management requirements within these property types, the NPS Management Policies categorizes cultural resources as archeological resources, cultural landscapes, structures, museum objects, and ethnographic resources.

Resource categories are useful because they help organize cultural resources into a manageable number of groups based on common attributes. On the other hand, categorization may obscure the interdisciplinary nature of many cultural resources. An early farmhouse, for example, may be filled with 19th-century furniture, form the centerpiece of a vernacular landscape, and occupy the site of a prehistoric burial mound. In addition to this type of overlap, cultural resources might also embrace more than one category or classification system. A stone ax can be both an archeological resource and a museum object, just as a fence may be viewed as a discrete structure, the extension of a building, and part of a landscape. Taken a step further, historic districts can be formed by various combinations of cultural landscapes, structures, and ethnographic and archeological resources.

2. NPS Resource Types

Archeological resources are the remains of past human activity and records documenting the scientific analysis of these remains. Archeological resources include stratified layers of household debris and the weathered pages of a field notebook, laboratory records of pollen analysis and museum cases of polychrome pottery. Archeological features are typically buried but may extend above ground; they are commonly associated with prehistoric peoples but may be products of more contemporary society. What matters most about an archeological resource is its potential to describe and explain human behavior. Archeological resources have shed light on family organization and dietary patterns, they have helped us understand the spread of ideas over time and the development of settlements from place to place.

Cultural landscapes are settings we have created in the natural world. They reveal fundamental ties between people and the land–ties based on our need to grow food, give form to our settlements, meet requirements for recreation, and find suitable places to bury our dead. Landscapes are intertwined patterns of things both natural and constructed: plants and fences, watercourses and buildings. They range from formal gardens to cattle ranches, from cemeteries and pilgrimage routes to village squares. They are special places: expressions of human manipulation and adaptation of the land.

Structures are material assemblies that extend the limits of human capability. Without them we are restricted to temperate climates, the distances we can walk, and the loads we can carry. With them we can live where we choose, cross the continent in hours, and hurl a spacecraft at the moon. Structures are buildings that keep us warm in winter's worst blizzard and bridges that keep us safe over raging rivers; they are locomotives that carry us over vast prairies and monuments to extend our memories. They are temple mounds and fishing vessels, auto factories and bronze statues–elaborations of our productive ability and artistic sensitivity.

Museum objects are manifestations and records of behavior and ideas that span the breadth of human experience and depth of natural history. They are evidence of technical development and scientific observation, of personal expression and curiosity about the past, of common enterprise and daily habits.

Museum objects range from a butterfly collection to the woven fragments of a prehistoric sandal. They include the walking cane of an American president, a blacksmith's tools, and the field notes of a marine biologist. They encompass fossilized dinosaur bones and business journals, household furnishings and love letters bound with a faded ribbon. They are invaluable–samples and fragments of the world through time and the multitude of life therein.

Ethnographic resources are basic expressions of human culture and the basis for continuity of cultural systems. A cultural system encompasses both the tangible and the intangible. It includes traditional arts and native languages, religious beliefs and subsistence activities. Some of these traditions are supported by ethnographic resources: special places in the natural world, structures with historic associations, and natural materials. An ethnographic resource might be a riverbank used as a Pueblo ceremonial site or a schoolhouse associated with Hispanic education, sea grass needed to make baskets in an African-American tradition or a 19th-century sample of carved ivory from Alaska. Management of ethnographic resources acknowledges that culturally diverse groups have their own ways of viewing the world and a right to maintain their traditions.

C. The Nature of Cultural Resources

1. Significance

An idea common to all cultural resources is the concept of significance. To be significant, a cultural resource must have important historical, cultural, scientific, or technological associations and it must manifest those associations in its physical substance. Put another way, the significance of cultural resources is based on two interrelated qualities. A cultural resource consists of a number of physical, chemical, or biological features; at the same time, it consists of ideas, events, and relationships. This duality is evident in cultural resources as small as a penny or as large as the Statue of Liberty. Fashioned from copper, both share common material properties. Shaped into symbols–one of economic value, the other of a fundamental human right–both also serve as expressions of ideas.

The physical and social dimensions of a cultural resource are inseparably interwoven. For a resource to be significant, its meaning must be indelibly fixed in form and fabric. The flag on Abraham Lincoln's box at Ford's Theatre epitomizes this relationship. Immediately after shooting the president, John Wilkes Booth jumped to the stage, catching his spur in a flag hung in front of the box. The material ripped, and so it remains–a small detail in the story of Lincoln's life, but tangible evidence of the horror of his death.

2. Associations

Regardless of type, every cultural resource must have a place in the history or prehistory of the United States, or it must have value for a particular ethnic group. This tie between a resource and its cultural context is its association. Associations commonly fall into one of four areas. Resources may be linked to historic events or noteworthy people; they may be embodiments of technical accomplishment, design, or workmanship; they may be sources of information important in historical or archeological research; or they may be important in the cultural system of an ethnic group. The context for these associations may be national in scale or focus on regional and local affairs.

Associations tie the rustic hotels of Yellowstone to the great craft revival of the early 20th century. They fix Casa Grande in a prehistoric network of desert canals, trade routes, and migration patterns. They frame the remains of Andersonville Prison in rules of honorable conduct that were shattered by the Civil War and relate the Blue Ridge Parkway to the development of an automobile-oriented society. Associations are integral to the significance of cultural resources because they define why each resource should be preserved and, by extension, what characteristics of each resource are most important.

Time provides a vantage point from which the associations of a cultural resource can be assessed in the broad course of human experience. Time is important as well because it provides a frame of reference for specific associations. A battlefield is important for the time in which the battle was fought–and perhaps also for what it reveals about later commemorative attitudes and practices. Although the home of a president is significant for the time of his occupancy, it might also be noteworthy for other distinguished occupants, for its architectural style or landscape setting. A resource may have more than one period of significance because it has more than one association, but every association must have a defined point or period in time.

As mentioned earlier, ethnographic resources are not limited to things commonly thought of as cultural resources, nor are ethnographic associations limited to past people and events. For ethnographic resources, associations are links to living traditions. For example, in ethnographic terms a grove of trees or a distant mountain peak might be considered worthy of preservation for social or religious associations when tied to the ongoing cultural practices and beliefs of a specific ethnic group. An archeological site significant for its scientific value may also be an ethnographic resource for its place in the mythology of a nearby pueblo.

3. Integrity

Although a cultural resource must have relevant associations, a cultural resource does not consist solely of those associations. In themselves, cultural resources are not a revolutionary engineering concept or a pattern of crop rotation, a landmark court case or the skills of a master craftsman. Cultural resources are physical entities with qualities such as mass, color, and texture, some of which express historical or cultural associations. Integrity addresses the degree to which behavior and ideas are manifested in the form and substance of a resource. A cultural resource has integrity if it retains material attributes associated with its social values.

Integrity has many attributes. It is the material aspect of a resource and the ways in which materials were put together; it is the relationship between different parts of a resource and the aesthetic qualities that resulted; it is the exact geographic location of a resource and the nature of its setting. Integrity may be hidden under coats of paint, aged by weather, or chipped away by rodents; but it is capable of being sensed–it can be recognized, described, and verified. Integrity is the past revealed in physical form.

Although all cultural resources must have integrity, the nature of integrity varies from resource to resource. For a noteworthy landscape, integrity may be a matter of spatial organization, plant types, and paving materials. In a writer's study, integrity may be found in the mementos and books displayed on a shelf or in the contents of a desk drawer. Buried remains of towns and villages retain integrity in the association between potsherds and pollen deposits, post holes and parched corn. For an architectural masterpiece, the quality of design is essential; for a traditional building type, workmanship may be most important.

Integrity is not the same as condition. The condition of a resource is defined in terms of deterioration; integrity is defined in terms of correspondence with associations in the past. Condition is a matter of rot and rust; integrity is a matter of age and authenticity. All physical things have a condition; they do not all have historical integrity. On the other hand, all things with historical integrity also have a condition. The condition of a resource during its period of significance is part of its integrity.

D. Essentials of a Comprehensive Program

1. Objectives of Cultural Resource Management

The dual nature of cultural resources, an inseparable union of social and physical qualities, leads directly to the three central issues of their management: first, to discover the significance or meaning of each resource; second, to slow the rate at which their essential material qualities are lost; and third, to support the use and enjoyment of cultural resources while minimizing negative effects on them. These imperatives are at the heart of the cultural resource program. Their corresponding activities are emphasized differently for each resource type and labeled differently from discipline to discipline. But we can discuss the sum of all these activities in terms of three broad functions: research, planning, and stewardship.

2. Research

Research begins by locating and evaluating cultural resources. It entails historical analysis and detailed physical examination. Research identifies Native American groups with traditional interests in park resources and locates places or things within park boundaries having special importance for them. It works through layers of debris in a coastal village site, discovering how people once lived from the proximity of fish bones, shell beads, and other things left behind. Research has the potential to identify changes in the field layout of a farming valley, establish the load-bearing capability of a building, and verify the origin of a historical document.

A major issue in research is setting appropriate limits on the scope and level of investigation. In most cases, NPS policy requires that research be driven by management concerns. Defining management concerns and translating them into a research activity requires dialogue between managers and cultural resource specialists. Research should also consider ideas and advice from people outside the Service–particularly our partners in cultural resource management, contemporary ethnic populations, historians, and scientists in related fields. This exchange should grow from a shared understanding about the nature of cultural resources, it should reflect awareness that treatment without adequate information may do more harm than good, and it should not presume that research is an end in itself.

3. Planning

Planning addresses the basic question, "How can we best take care of our resources while allowing the public to enjoy them?" Good answers to this question require creative thinking, insightful analysis, and well-tempered flexibility. Planning seeks to identify and assess the likely effects of an action on cultural resources before that action is taken. Planning also recognizes the validity of different cultural perspectives and finds ways to integrate those viewpoints with park management objectives. Planning looks not just at desired results, but also at the potential for unintended harm. Putting a 19th-century quilt on display may help tell a story about American craft traditions, but it may also increase the possibility of the quilt being soiled, mutilated, or stolen. Planning weighs the tradeoffs between preservation and functional considerations in finding uses that best fit a specific resource.

Although inappropriate uses can have devastating effects on cultural resources, protective treatments may themselves give cause for concern. Use of herbicides to control vegetation in an archeological site may prevent damage from roots but might also invalidate Carbon-14 dating of material recovered from that site. Application of some latex paints may reduce maintenance costs for historic woodwork but might also result in surface loss from water vapor trapped under the new coating. Similar problems have been encountered with abrasive cleaners, metal reinforcing rods, and mothballs. Slowly, constantly, at the scale of pinholes and hairline cracks, these threats can bring down the largest of structures and reduce the hardest stone to dust.

4. Stewardship

Research and planning culminate in stewardship. Stewardship consists of systematic, responsible actions directly affecting resources. Stewardship is a matter of matching ability with the task at hand. Watering a lawn, dusting furniture, and oiling door hinges are common acts of stewardship. So too are pruning a tree and replacing a worn stair tread–although this work requires a higher level of knowledge and ability. Even more skill is needed to repair fragile materials such as frescos in a Spanish Colonial church, to propagate historic plant material embodied in a rare fruit tree cultivar, or to recover data from a prehistoric hunting camp. Stewardship seeks to limit the loss of historic materials and to maintain historic character; it results in the perpetuation and appreciation of cultural values.

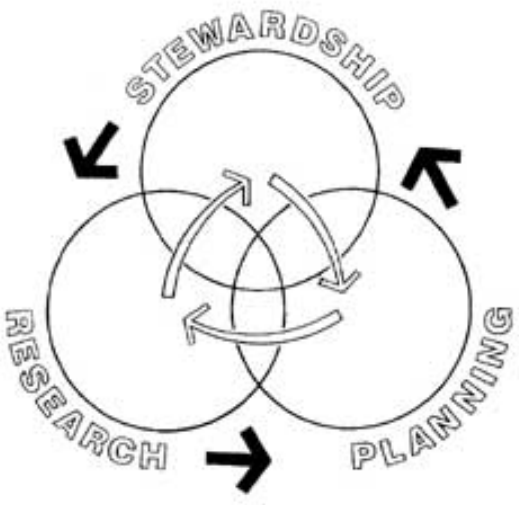
Most of the threats to cultural resources come from their surroundings. Theft, uncontrolled relative humidity, and careless handling endanger museum objects. Looting, soil erosion, and rodents eat away at archeological resources. Acid rain, fire, and remodeling pose serious threats to historic structures. Wildland fires, highway improvements, and plant diseases wreak havoc with cultural landscapes. Fencing, pollution, and insensitive use can desecrate an ethnographic resource.

Responses to these threats are many and varied. They range from police stakeouts to improved record-keeping, from installation of smoke alarms to structural monitoring gauges. But the two most important and effective protective measures cannot be seen. The first is a positive, caring attitude toward cultural resources. Coupled with knowledge, such an attitude prepares every employee to act as a resource steward–recognizing threats, taking appropriate emergency action, and calling for assistance. The second measure is a spirit of cooperation that reaches out to form stewardship coalitions with local governments, professional organizations, state agencies, and nonprofit groups. Such partnerships are essential to confronting threats located outside park boundaries; they are also supportive of more comprehensive approaches to resource identification, planning, and heritage education.

E. Program Dynamics

1. The Process and the Cycle

Research, planning, and stewardship: these are the basic functions of cultural resource management. Taken as a sequence, they proceed from information gathering to thoughtful deliberation to informed action. To the extent that stewardship is a final step, management of cultural resources is a linear process. The process is also cyclic because every act of stewardship creates new conditions that should be recorded as part of the park information base. In addition, the program contains feedback loops that allow each management function to refer back to the preceding set of activities. If a planning option requires information that is currently unavailable, more research can be done. If treatment of a resource uncovers previously unknown features, work can be reevaluated and earlier planning decisions can be revised as necessary.



2. The Human Factor

Implementation of a cultural resource program is a matter of concerted individual effort. People, not programs, are resource stewards. Superintendents and cultural resource specialists certainly play critical roles. So, too, do the carpentry helper, park ranger, and budget clerk–in fact, every person working in a park is a steward to the extent that his or her actions affect cultural resources. Those working in NPS centers and support offices are also part of the stewardship team. Beyond them are employees in state historic preservation offices, people working in other government agencies, educators, tribal representatives, businesspeople, and interested private citizens.

Effective stewardship requires that people work together whenever a cultural resource could be affected by their actions. For example, protection of a prehistoric burial site might involve the joint effort of a park superintendent, Native American representatives, a soils engineer, a physical anthropologist, and a contract specialist. Protection of a historic building interior might bring together a historian, paint conservator, structural engineer, mechanical contractor, architect, and curator. Teamwork is essential because, in most cases, no one person fully knows the nature of a specific resource, the reasons behind a particular project, or the full range of implementation alternatives.

3. Decision-Making

The challenge inherent in cultural resource management is that each resource is only one of many concerns clamoring for attention in a park. A historic lodge may need a new roof at the same time that the museum collection needs to be cataloged, bathrooms need to be cleaned, lawns need to be cut, and roads need to be patrolled. What principles might illuminate the choices between such options?

A good first principle is that appreciation of a resource lies outside of contemporary concerns. Law and policy require that we understand and evaluate each resource in the context of its own time and its own culture. Such an approach is well established in terms of survey and evaluation procedures. It applies equally well to identification of physical attributes deserving preservation and conditions that threaten to degrade or destroy a resource. Significance, integrity, and threats should be well understood before attention is turned to matters of maintenance, security, staffing, and use.

A second principle is that decisions should recognize variations in meaning, integrity, and threats. Every cultural resource, no matter how humble or how widely valued, must be addressed in the park resource management program. But when funds and labor are insufficient to meet the needs of all resources, differences should be acknowledged. For example, the home of a president is typically of greater interest to more people than the residence of a state governor; an example of skilled workmanship, such as a finely crafted mantlepiece, usually contributes more to the historical integrity of a house than do the unfinished walls of a basement; rapid change in relative humidity is far more likely to harm a table with wood veneer than it is to break down a basalt grinding stone. Decision points should take advantage of these variations to provide greater protection to more significant fabric, mitigate more serious threats, and give higher attention to more noteworthy resources.

Third, and finally, cultural resource management must be integrated with natural resource management, education, and visitor experience as the primary concerns of park management. An integrated approach builds on the fundamental relationships among physical, biological, and social systems; it views human beings as part of the natural world and the natural world as the basis for human activity. This is not to say that other issues and other federal mandates are unimportant. Rather, it is a recognition of the National Park Service's mission and its leadership role in resource management.

In summary, effective decisions begin by recognizing the unique attributes of a cultural resource and expand out to encompass the full range of contemporary concerns. Practical utility, aesthetic appeal, political implications, and replacement costs usually have nothing to do with significance. On the other hand, such considerations may help move a locally significant resource into next year's work schedule. Resource-specific variability and timely consideration of practical issues–these are cornerstones for decisions made in the spirit of stewardship.

4. A Living Legacy

The cultural environment is the nursery in which each generation is nurtured and socialized; it is the workshop in which each generation elaborates on its received tradition; and in the end, it is the legacy that each generation passes on to its descendants. As we emerge from childhood, each of us becomes part of a group tradition and each accepts the burdens of social responsibility. As we learn about these traditions, we are shaped by them; as we live these traditions, we give them new expression. Each cultural resource is a symbol: a tangible reminder of values and ideas; a spark to touch our spirits and to fire our imagination. Cultural resources provide a path by which we can discover our own humanity: the magic of birth, the mystery of death, and all the wonder of living that lies between.

The cultural resources in our parks are an invitation to see our country, our neighbors, and ourselves in a new light. They are a challenge to commonplace ideas about human nature, ethnic characteristics, and national identity. They hint and tease and provoke. What makes this nation special? What are the broad patterns and singular events that shaped this country? Who were the leaders and the innovators–the ones who pushed back the boundaries of what could be? And what is the character of its people: the original inhabitants and those who came later from all parts of the world–people who differed in language, faith, custom, dress, and color? What can we learn from them?

Although the primary function of cultural resource management is to preserve, protect, and conserve the material aspects of cultural resources, the primary value of those resources is to enliven, enrich, and inform. In this era of rapid and continuous change, cultural resources provide essential points of orientation and inspiration. Cultural resources help provide a setting in which cultural diversity is viable and individual potential can be realized; they help bring us together in a spirit of appreciation for the past in order to better meet the challenges of tomorrow.

CHAPTER 2: RESEARCH

According to the NPS *Management Policies*, "The National Park Service will conduct a coordinated program of basic and applied research to support planning for and management of park cultural resources." Such mission-related research can identify and evaluate historic properties, advance knowledge of ethnographic resources and their importance to Native Americans, provide background data on park issues, contribute to interpretive programs, help avoid adverse impacts, and develop technologies for treating, monitoring, and protecting cultural resources. Research will be accomplished with the participation and review of professionals in all disciplines concerned with its subject.

Standards

- Research is mission-related and supports cultural resource management and interpretation; research unrelated to NPS requirements is not undertaken or funded by the NPS (but may be conducted by qualified independent investigators).
- Research adequate to support planning and legal compliance precedes final decisions about the treatment of cultural resources and about park development or operational activities that might affect them.
- Research is interdisciplinary.

A. Research Methodology

1. Task Directive

The first step in developing a research strategy is the task directive, which serves as the contract between management and the researcher(s). To ensure that the research will be mission-related, the task directive clearly states its purpose and scope and spells out issues to be resolved. It identifies the research team and its consultants. It outlines the specific steps to be taken and products to be prepared. It defines the level of investigation (see next page). It sets time limits and projects a research budget required to deliver specified product(s).

NPS center and support office specialists, the state historic preservation officer (SHPO), and interested Native Americans should be consulted in preparing task directives for complex or controversial projects.

(For more detail see Chapter 4 of the *Planning Process Guideline* [NPS-2].)

Levels of Investigation

Exhaustive Investigation: For historical studies this means employing all published and documentary sources of known or presumed relevance, interviewing all knowledge-able persons regard-less of location, and thoroughly analyzing and presenting findings from all data of direct and indirect relevance. For archeological studies sufficient data are collected and analyzed to determine location, characteristics, and scientific values of archeological resources through systematic intensive surveys. Techniques include surface collection, subsurface testing, remote sensing, excavation, and thorough analysis of recovered materials. For architectural and landscape studies it means investigating all features, with destructive investigation as necessary, to establish as exactly as possible all recoverable detail (usually in response to a restoration or reconstruction management objective). For museum objects it means exhausting all original documentary sources, making physical comparisons with similar objects, and sampling and testing fabric for identification, dating, and circumstantial evidence. For ethnographic studies it means collecting empirical data by observation, interviews, and censusing and reviewing and analyzing accessible archival and documentary materials, requiring at least a year of full-time work and a team approach.

Thorough Investigation: For historical studies this means research in selected published and documentary sources of known or presumed relevance that are readily accessible without extensive travel and that promise expeditious extraction of relevant data, interviewing all knowledgeable persons who are readily available, and presenting findings in no greater detail than required by the task directive.

For archeological studies, see discussion (above) on intensive surveys. For architectural and landscape studies it means non-destructive investigation using all appropriate technical means (usually in response to a preservation management objective). For museum objects it means seeking selective readily available documentation and making physical comparisons with similar objects. For ethnographic studies it means using the same methods as the exhaustive study but requiring no less than seven months.

Limited Investigation: For historical studies this means research in available published sources, usually of a secondary character; research in documentary sources if easily accessible and known to be of high yield; brief interviews of readily available persons to answer specific questions; and a report in no greater detail than directly required by the task directive. For archeological studies it means collecting preliminary or predictive data about the distribution and general nature of archeological resources. Reconnaissance surveys provide only partial coverage with little or no surface collection or subsurface testing while sampling methods and remote sensing techniques are sufficient to guide initial planning, requiring intensive surveys for design and construction. For architectural and landscape studies it means nondestructive investigation (usually in response to a management objective regarding a feature). For museum objects it means checking existing documentation and making comparisons with similar objects through use of secondary sources. For ethnographic studies related to planning it means experienced ethnographers familiar with the literature and affected groups using Rapid Ethnographic Assessment, including focus group and individual interviews, site visits, and transects, requiring a team approach and completion within four months.

2. Research Design

The research design states the goals, methodology, and explicit assumptions of the researcher(s). It can be incorporated into the task directive or prepared separately. It should briefly summarize existing knowledge of the topic, identify research questions, and discuss the rationale for addressing them. It should provide for interdisciplinary study where appropriate, clearly defining relationships between disciplines. It should delineate the physical extent of the area to be investigated and the amount of information to be gathered. The methods to be used, such as documentary research, oral history, field investigation, excavation, destructive investigation, and anthropological fieldwork, should be discussed, and the expected results should be presented.

The same parties consulted on the task directive should be invited to comment on the research design, especially traditionally associated communities. (For more detail see the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation [Appendix C].)

3. Documentary Research

In most cases documentary research should precede field work. Research beyond published sources should be explicitly defined in the task directive in keeping with a level of investigation meeting management needs. Service-wide inventories should be reviewed for pertinent information, and the SHPO and other federal and state agencies, as well as private agencies and sources, should be consulted.

4. Field Investigations

The primary purposes of field investigations are to identify resources, define their exact locations, obtain descriptive data, determine their integrity and condition, and evaluate their significance. With proper compliance, they may entail reconnaissance, sampling, excavation, physical examination of material, or anthropological study at whatever level of investigation is prescribed in the task directive.

(For more information on surveys see the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation; National Register Bulletin 18, How to Evaluate and Nominate Designed Historic Landscapes; National Register Bulletin 24, Guidelines for Local Surveys: A Basis for Preservation Planning; National Register Bulletin 30, Guidelines for Evaluating and Documenting Rural Historic Landscapes; National Register Bulletin 38, Guidelines for Evaluating and Documenting Traditional Cultural Properties; a joint NPS-Advisory Council on Historic Preservation publication, Identification of Historic Properties: A Decision-Making Guide for Managers; and an NPS manual, The Archeological Survey: Methods and Uses. See Chapter 10 of this guideline for guidance on surveying park ethnographic resources.)

5. Report

Once the documentary research and field investigation (including physical examination) are completed, the photographs, drawings, material samples, field notes, data files, and construction files are analyzed and interpreted in preparation of the final report. These research products also become part of the park information base and should be used as foundations for future research. They should be managed as museum collections. (See Chapter 9 of this guideline for archival management standards.)

Copies of the draft report will be submitted for review and comment to the park and to subject matter experts in and outside the NPS for peer review. Copies should also go to the SHPO, associated Native American groups, and other knowledgeable and interested parties for review and comment, if appropriate. At this time, the researcher should give presentations or training courses on his or her findings to the park's staff. The researcher will incorporate appropriate review comments in the final report, which must be approved by the superintendent or regional director.

The number of copies printed and distributed depends on the topic and park requirements. Minimum distribution is indicated in Appendix D; additional copies may be printed and distributed to other interested parties in and outside the NPS. (Publications distributed outside the Department of the Interior are generally subject to departmental review and approval via Form DI-550 before printing; printing coordinators are responsible for obtaining this approval.) The cluster coordinator lists the report in the NPS Cultural Resources Management Bibliography (CRBIB), a computerized, multidisciplinary inventory of professional reports, books, articles, and other publications addressing park cultural resources. Archeological reports should also be added to the Reports portion of the National Archeological Database. (For more information see the *Cultural Resources Management Bibliography [CRBIB] User's Manual* and the *NADB User's Manual*.)

Outside publication of reports in professional journals or books is encouraged.

Standards

- Research follows NPS procedures, including preparation of a task directive and research design, appropriate levels of documentary research and field investigation, and review and comment by the park and peer reviewers. The park superintendent or regional director approves all studies.
- Research conforms to the professional and ethical standards of related disciplines.
- Outside consultation and peer review provide opportunities for other professionals and interested parties to comment.
- An appropriate level of research precedes any NPS action that might reduce the research potential of cultural resources.
- Research results are timely and used to meet legal compliance and management decision requirements.
- Research designs provide for the confidentiality of sensitive information, including the location of archeological sites and sacred places and the names of local consultants.
- Final reports concerning history, historic structures, cultural landscapes, and museum objects generally conform in punctuation, footnote and bibliographic form, and other stylistic matters to the latest edition of *A Manual of Style* by the University of Chicago Press. (Footnotes are preferred, but endnotes are permissible.) Final reports in archeology are consistent with the style prescribed by the Society for American Archaeology. Formal reports in ethnography and cultural anthropology conform to the style prescribed by the American Anthropological Association.
- Final reports are reproduced in full and distributed within the timeframe established in the task directive. They and their findings are publicized in appropriate professional, technical, and popular publications and other media, with confidentiality ensured when appropriate.
- Object collections, field notes, sketches, plans, maps, photographs, computerized databases, and interview tapes and transcripts are properly curated and maintained as part of the park's museum collection and its information base, with confidentiality ensured when appropriate.

B. Resource Identification, Evaluation, and Registration

Section 110 of the National Historic Preservation Act requires park managers, in consultation with their SHPOs, to establish programs to locate, inventory, and nominate to the National Register of Historic Places all properties that appear to qualify. For archeological resources, the Service's systemwide archeological inventory program establishes requirements, standards, and priorities to assist parks in planning, programming, funding, and conducting archeological inventories. This program is tailored to the specific needs of each park cluster in a cluster-wide archeological inventory plan. (For further information see Chapter 6 and *National Park Service's Systemwide Archeological Inventory Program* [October 1992].)

Research to identify cultural resources should follow the research methodology described above.

Documentary research and field investigations help develop the park's inventory of cultural resources and the historic contexts for the area. The park's inventory includes all cultural resources (including those ineligible for the National Register) required for interpretation, planning, Section 106 and 110 compliance, resource protection, and monitoring. Historic contexts–historical themes delineated by time periods and geographic areas–are the frameworks within which individual resources can be evaluated. At Mammoth Cave National Park, for example, "Discovery and Early Uses of Mammoth Cave, 1798—1849" is a historic context. Once identified, cultural resources should be evaluated by applying the criteria of the National Register within historic contexts and listed in appropriate Service-wide inventories.

(For more information on historic contexts and evaluation, see the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation; National Register Bulletin 15, How to Apply the National Register Criteria for Evaluation; the NPS publication Revision of the National Park Service's Thematic Framework (1996); and specific state historic preservation plans.)

Properties believed eligible should be nominated to the National Register. In accordance with 36 CFR Part 60, parks will submit draft nominations to SHPOs and the NPS federal preservation officer, who will forward them to the National Register for review.

(For more information on nomination to the National Register, see the procedures in 36 CFR Part 60; the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation; National Register Bulletins 16A and 16B, Guidelines for Completing National Register of Historic Places Forms; and Appendix Q of this guideline.)

Historical parks of the national park system are automatically listed in the National Register upon their legal authorization. National Register nomination forms and boundary maps nevertheless must be prepared for them to document and delineate the resources contributing to their significance.

C. Service-wide Inventories of Cultural Resources

As cultural resources are identified and evaluated, they should also be listed in the appropriate Service-wide inventories of cultural resources. Copies of these inventories should be shared with the SHPOs.

1. Cultural Landscapes Inventory (CLI)

The CLI is a computerized, evaluated inventory of all cultural landscapes in which the NPS has or plans to acquire any legal interest. Its purpose is to identify cultural landscapes in the system and provide information on their location, historical development, character-defining features, and management. The CLI assists park managers in planning, programming, and recording treatment and management decisions. CLI forms, including maps, drawings, and photographs, are maintained at the support offices and the parks.

2. Cultural Sites Inventory (CSI)–Archeology and Ethnography (under development)

Information documenting location, description, significance or cultural meaning, condition, threats to, and management requirements of park archeological and ethnographic resources is compiled and maintained for all parks. The CSI provides necessary information for resource planning, interpretation, preservation, and protection. Consultation is required with traditionally associated groups. Original documents and records, including field notes, forms, reports, maps, and other related materials, will be developed and maintained at the support offices or archeological centers and the parks. Data are entered into the CSI-Archeology's computerized database. The Ethnographic Resources Inventory (ERI) database is in the initial planning stages.

3. List of Classified Structures (LCS)

The LCS is a computerized, evaluated inventory of all historic and prehistoric structures having historical, architectural, or engineering significance in which the NPS has or plans to acquire any legal interest. Included are structures that individually meet the criteria of the National Register or are contributing elements of sites and districts that meet the Register criteria. Also included are other structures–moved, reconstructed, and commemorative structures, and structures achieving significance within the last 50 years–that are managed as cultural resources because of decisions reached through the planning process. The LCS assists park managers in planning, programming, and recording decisions of appropriate treatment. LCS forms, including attachments, will be maintained at the support offices and the parks. The LCS data base may also be maintained at the park. (For more information see the List of Classified Structures [LCS] User's Manual [1993] and Chapter 8.)

4. National Catalog of Museum Objects

The computerized National Catalog lists all cultural objects and natural history specimens that meet the criteria for museum objects in the national park system. Museum Catalog Records (Form 10-254) are completed and filed in the parks with copies to the Museum Management Program in the National Center for Cultural Resources Stewardship and Partnership Programs. The catalog record contains collection and property management, documentary, and research data for the museum objects. (For more information see the NPS Museum Handbook, Part II, Museum Records [rev. 1984]; and the NPS Automated National Catalog System User Manual [1987].)

5. National Register of Historic Places

Authorized by the National Historic Preservation Act of 1966 and administered by the NPS in the National Center for Cultural Resources Stewardship and Partnership Programs, the National Register is the nation's official list of districts, sites, buildings, structures, and objects in both public and private ownership that are significant in American history, architecture, archeology, engineering, and culture. The National Register includes historical areas of the national park system, properties designated by the Secretary of the Interior as national historic landmarks, properties nominated by SHPOs and federal preservation officers, and cultural properties on the World Heritage List. The NPS is required by law to survey, inventory, and nominate to the National Register properties of national, state, and local significance in its custody that meet the National Register Criteria for Evaluation and to document to National Register standards its historical areas administratively listed in the Register. NPS nominations and documentation are submitted through the NPS federal preservation officer. Cultural resource studies that establish historic contexts and describe and evaluate historic properties can form the basis of National Register nominations when this information is transferred to nomination forms.

Cultural resources should be removed from the National Register, following specified procedures, if research reveals that they did not or do not meet the Register criteria. When resources formerly listed on the National Register have lost their qualifying integrity, the CLI, CSI, and LCS should continue to reference them but indicate their ineligibility.

D. Procedures for Established Areas

Even long-established parks may not have completed inventories of cultural resources. For example, archeological resources may continue to be identified and require addition to the Cultural Sites Inventory. Parks administratively listed in the National Register may never have been documented on National Register forms. The possible presence of previously unstudied resource types such as cultural landscapes and ethnographic resources may require additional data collection, new historic contexts, and further field investigations to initiate the Cultural Landscapes Inventory and update the Cultural Sites Inventory. Museum collections typically continue to grow.

Standards

- Each park has its cultural resources identified and evaluated, and those eligible are listed in the National Register and other appropriate Service-wide inventories.
- Historic contexts are developed for each park to assist in cultural resource evaluation and park planning.

E. Baseline Research Reports

Baseline research reports provide information that can serve a variety of purposes, from planning to interpretation. These reports should be completed before more specialized studies are undertaken.

1. Archeological Overview and Assessment

This report describes and assesses the known and potential archeological resources in a park area. The overview reviews and summarizes existing archeological data; the assessment evaluates the data. The report assesses past work and helps determine the need for and design of future studies. It is undertaken in a park or regional geographical framework and may be a part of multi-agency planning efforts.

2. Archeological Identification/Evaluation Studies

These studies identify the locations and some of the characteristics of all or a sample of archeological resources in a particular area. Data on these resources are added to the computerized CSI-Archeology database. Sufficient data are then collected and analyzed to evaluate the resources for the National Register. Information about the locations of all known archeological resources, the areas surveyed, and the level of intensity of the survey are shown on each park's cultural resource base map. These studies are frequently linked with archeological overviews and assessments to resolve management and interpretive concerns.

3. Ethnographic Overview and Assessment

This basic report emphasizes the review and analysis of accessible archival and documentary data on park ethnographic resources and the groups who traditionally define such cultural and natural features as significant to their ethnic heritage and cultural viability. Limited interviews and discussions occur with the traditionally associated people in order to supplement and assess the documentary evidence and identify gaps in the available data. (See Chapter 10 for other studies.)

4. Cultural Affiliation Study

Using anthropological, archeological, ethnohistoric, historic, and other evidence, this study satisfies the need to identify cultural ties among past and present groups that used and may still use or relate to park resources and park natural and cultural resources, including museum objects.

5. Historic Resource Study (HRS)

A historic resource study (HRS) provides a historical overview of a park or region and identifies and evaluates a park's cultural resources within historic contexts. It synthesizes all available cultural resource information from all disciplines in a narrative designed to serve managers, planners, interpreters, cultural resource specialists, and interested public as a reference for the history of the region and the resources within a park. Entailing both documentary research and field investigations to determine and describe the integrity, authenticity, associative values, and significance of resources, the HRS supplies data for resource management and interpretation. It includes the preparation of National Register nominations for all qualifying resources and is a principal tool for completing the Cultural Landscapes Inventory and the List of Classified Structures. The HRS identifies needs for special history studies, cultural landscape reports, and other detailed studies and may make recommendations for resource management and interpretation.

HRSs will vary in scope depending on management needs. Relevant information readily available in other sources need not be included except by reference. Additional HRSs are appropriate to address themes, resource types, and other subject matter not originally covered. Although the HRS is interdisciplinary in character, the principal investigator is usually a historian.

6. Cultural Resources Base Map

A base map (or maps) depicts all known historic sites and structures, cultural landscapes, long-distance trails and roads, and archeological and ethnographic resources. As additional resources are discovered they should be mapped. Documented troop movement maps may be included for battlefield parks.

7. Park Administrative History

This history, of particular value to managers, planners, and interpreters, describes how a park was conceived and established and how it has been managed to the present day. The park's legislative history and important issues in planning, land acquisition, development, public relations, and other topics of ongoing management concern are emphasized. (For more detailed guidance see National Park Service Administrative History: A Guide [1991].)

8. Rapid Ethnographic Assessment Project (REAP)

This field study, initiated before or as part of the scoping for general management or other park plans, provides basic planning and program evaluation information. The ethnographer organizes a research team, which includes NPS and community representatives, to collect and analyze data within four months or in accord with the planning schedule. (REAP does not substitute for the more thorough ethnographic overview and assessment or traditional use study.)

9. Scope of Collection Statement

This is the basic curatorial planning document required for all parks. Evolving from legislation and planning documents specific to each park, it guides a park's acquisition and preservation of those museum objects that contribute directly to interpretation and understanding of its themes, as well as any additional objects that the NPS is legally mandated to preserve. It defines the purpose and significance of the park's museum and archival collections; sets limits on collection size and quality by defining subject matter, geographical location, and time period for additions; and considers uses of the collection. Parks that do not have museum or archival collections and do not intend to acquire museum objects must submit brief scope of collection statements to this effect. (For more detailed guidance see the NPS Museum Handbook, Part I, Museum Collections, Chapter 2 [1994] and Appendix E [1996].)

F. Abbreviated and Specific Resource Studies

In some instances, conditions may prevent the completion of a full baseline report or study. The research methodology described in this chapter should nevertheless be followed, with a task directive and research design defining the scope and conduct of the research. Partial completion of a standard baseline report is preferable to the development of a new study type. Moreover, studies that address specific management needs should be organized within the context of a full baseline study. For example, a study on mining at Death Valley should recognize other historical themes and resources and meet the standard of a historic resource study. HRSs can be done in phases, years apart, with appropriate conceptual and contextual organization. Special history studies, which usually focus on single themes to provide data for interpretation, should follow comprehensive studies addressing a park's full array of themes and resources. (Section 110 of the National Historic Preservation Act requires inventory and evaluation of all cultural resources–not merely the most prominent or interpretable.)

Oral history collection is often combined with historic resource studies, archeological research, and ethnographic studies. It should follow standard professional methodology. Special attention should be placed on obtaining release forms from those interviewed and on proper care and maintenance of tapes. These materials should become part of the park's museum collection. (See Collecting, Using, and Preserving Oral History in the National Park Service [Harpers Ferry Center, 1984].)

Studies addressing specific resources in greater detail, such as historic structure reports, cultural landscape reports, historic furnishings reports, ethnohistories, ethnographic reports, and archeological data recovery studies, are described in the specific resource chapters.

Standards

- Each park has completed all relevant baseline reports.
- Reports, studies and other narratives, documented maps, drawings, photographs, and museum records of park cultural resources are prepared with sufficient accuracy and coverage to meet relevant planning and management needs.

G. Physical Documentation and Material Analysis

The primary purpose of physical documentation and material analysis is to confirm and enlarge upon earlier findings regarding the integrity and historical associations of structures, landscapes, sites, and museum objects. This type of research also improves understanding of conditions aiding the development of treatment recommendations. It is also used to record the significant attributes of a cultural resource before its modification or demolition. (For more information see the Secretary of the Interior's Standards and Guidelines for Architectural and Engineering Documentation.)

All documentation and material samples generated by this type of research are primary resources and should be handled according to the provisions outlined in the *Museum Handbook*. Every effort should be made to use non-destructive methods of analysis before using destructive ones.

Standards

- Historic structures and cultural landscapes are recorded in historic structure reports and cultural landscape reports. Analysis of archeological sites is recorded in archeological project completion reports and analysis of museum objects in object examination reports.
- Material samples, field notes, photographs, and drawings are curated following established procedures and deposited in appropriate museum collections.
- Research results are promptly reported to interested parties.

H. Qualifications of Researchers

Examples of selective or quality-ranking factors for cultural resource specialists in the NPS appear in Appendix E. Minimal qualifications appear in OPM Handbook X-118.

Whenever possible, contracting for research should strive for the best-qualified researcher, not the lowest bid. For most kinds of research, the best-qualified researcher is most likely to be found through the request for proposals (RFP) process. This process requires a scope of work to define the research and evaluation criteria to rank the researchers. (For more detail see contracting procedures.)

Management Policies encourages cooperative relationships with recognized educational and scientific institutions and qualified individuals to promote research serving park management objectives. Independent research pertinent to the broader contexts within which park resources exist is also encouraged. NPS facilities and assistance will be made available to qualified scholars conducting NPS-authorized research as long as park operations will not be impeded or park resources impaired.

Standards

- All research, whether conducted by NPS personnel, contractors, cooperative researchers, or independent researchers, is conducted by fully qualified personnel and conforms to current standards of scholarship.
- All cooperative and independent research conforms to NPS policies and guidelines.

I. Funding and Staffing

Each park with a research program should have at least one person responsible for developing it, monitoring the research, and seeing that the results are implemented in park operations. While support office and center staff provide expertise, the park is ultimately responsible for its own program. Funding and staff (FTE) should therefore be allocated for this position.

Research may be conducted by NPS employees in centers, support offices, and parks. It may also be conducted by contractors and cooperating parties as noted above. Planning for research should take into account the relative benefits and costs of using staff and outside researchers.

Research projects should be properly programmed on Form 10-238 and justified in the park's resources management plan.

Standards

- Adequate money and staff are sought and obtained to manage and carry out the park's research program.
- All NPS-funded research is identified, justified, and approved in the park's resources management plan.
- Project budgets cover the costs of cataloging, stabilization, and initial storage for field records, maps, objects, and specimens that are project-generated.

CHECKLIST FOR RESEARCH

- All NPS-funded research is mission-related.
- Research is multidisciplinary and supports cultural resource management.
- Research at the appropriate level of investigation precedes planning decisions involving cultural resources.
- Research follows NPS procedures and conforms to professional standards.
- Research provides for confidentiality of sensitive information.
- Research data are accessioned and cataloged as part of the park's museum collection.
- All cultural resources are inventoried and evaluated in consultation with state historic preservation officers.
- Cultural resources are listed in appropriate Service-wide inventories, including the National Register of Historic Places.
- The first research studies for a new park are the Historic Resource Study and the Archeological Overview and Assessment.
- All relevant baseline reports are completed.
- Research is conducted by qualified researchers.
- Adequate funds and staff exist to manage the park's research program.
- Research needs are properly documented in resources management plans and programmed according to budget processes.
- Project budgets provide for proper care of project-generated objects and associated records.

CHAPTER 3: PLANNING

A. The Planning Process

Planning is a formal decision-making process, dynamic and continuous, to ensure that the missions of the National Park Service are accomplished. This requires that a number of interests, including those of cultural resource management, be considered. Effective planning identifies conflicting interests early and facilitates resolution of conflicts.

Planning includes a statement of mission, the definition of objectives, the identification of issues and opportunities, the collection and analysis of data, the development and evaluation of alternatives, and the selection of a preferred alternative. (For more details see the *Planning Process Guideline* [NPS-2].)



The goal of cultural resource planning in the national park system is to identify and preserve park cultural resources and provide for their appreciation by the public. It strives to integrate cultural resource concerns into broader NPS planning processes, to avoid or minimize harm to cultural resources, to identify the most appropriate uses for cultural resources, and to determine the ultimate treatment (preservation, rehabilitation, restoration, reconstruction/reproduction) or deliberate neglect or destruction for cultural resources. Development of Geographical Information Systems (GIS) helps planners identify and protect cultural resources while addressing other park concerns.

Planning responsibilities extend beyond cultural resources that relate to a park's establishing legislation or interpretive needs. Under Sections 106 and 110 of the National Historic Preservation Act, federal agencies must establish programs to identify, evaluate, and nominate to the National Register of Historic Places eligible properties under their control and manage such properties with due consideration for preservation of their cultural values. Under this mandate, planning responsibilities include not only nationally significant properties but also those that may be eligible because of their importance to a locality, state, or region.

Although planning is a decision-making process for managers, it must consider the concerns of others. Consultation with the Advisory Council on Historic Preservation and state historic preservation officers (SHPOs) is required by law and regulation. Regulations and *Management Policies* also require consultation with Native Americans and other concerned ethnic groups, other federal agencies, state and local governments, and other interested parties. While compliance with the National Historic Preservation Act addresses most cultural resource concerns, planners and managers must also comply with the National Environmental Policy Act. (See Chapter 5 for compliance with Section 106 of the National Historic Preservation Act, including special provisions for park plans.)

B. Planning Scopes

Planning can focus on a specific resource or resource type, address a major segment of a park, cover an entire park, or transcend park boundaries. The first type of planning results in action plans of the kind described in Chapters 6 through 10. Because parks are part of larger cultural environments, and because the Service's concern for cultural resource preservation extends beyond parks, the NPS has increasingly become involved in planning beyond park boundaries. NPS cultural resource specialists should participate actively in planning for national heritage corridors, partnership parks, national trails, and other joint ventures.

Standards

- Before planning commences, a comprehensive park inventory of cultural resources within the area to be affected is compiled.
- Planners, cultural resource specialists, and managers coordinate funding and schedules for research including schedules for planning.

Planning Document

- Special resource study (new area study)
- Statement for management
- General management plan
- Development concept plan
- Interpretive prospectus
- Design and treatment plans

Cultural Resource Information Sources

Special resource study (new area study)

- Existing inventories and literature review
- Preliminary historic contexts
- Rapid ethnographic assessment project

Statement for management

- Ethnographic overview and assessment
- Historic contexts and theme studies
- Scope of collection statement/collection reports/plans

General management plan

- Archeological identification and evaluation studies
- Archeological overview and assessment
- Archeological sites base map
- Cultural affiliation study
- Cultural Landscapes Inventory
- Ethnographic overview and assessment
- Historic resource study
- List of Classified Structures
- Rapid ethnographic assessment project
- Scope of collection statement and available reports/plans

Development concept plan

- Archeological identification and evaluation studies
- Archeological overview and assessment
- Archeological sites base map
- Collection mgt. plan and available reports/plans
- Cultural affiliation study
- Historic furnishings report
- Historic resource study
- Historic structure report/cultural landscape report
- Rapid ethnographic assessment project
- Social impact assessment
- Special history study
- Traditional use study

Interpretive prospectus

- Archeological identification and evaluation studies
- Archeological overview and assessment
- Archeological sites base map
- Cultural affiliation study
- Ethnographic overview and assessment
- Exhibit plan
- Historic furnishings report
- Historic resource study
- Scope of collection statement

Design and treatment plans

- Archeological data recovery plan
- Archeological identification and evaluation studies
- Archeological sites base map
- Checklist for Pres. & Protection of Museum Collections
- Historic structure report/cultural landscape report
- National Register nominations/eligibility determinations for archeological resources
- Physical documentation and material analysis

- Planners, cultural resource specialists, and managers weigh the significance of cultural resources, their condition, their interpretive value, their research potential, the availability of data about them, and threats to them in determining their ultimate treatment and use.

- Planners, cultural resource specialists, and managers consult with and consider the views of the SHPOs, Advisory Council on Historic Preservation, other federal agencies, local governments, Native Americans and other concerned ethnic groups, and other interested parties as part of compliance with Section 106.

- Planners, cultural resource specialists, and managers consider cultural resource issues that may relate to lands outside park boundaries and participate actively in planning efforts by or involving neighboring jurisdictions.

C. Resources Management Plans

"Each park with cultural resources will prepare and periodically update a cultural resource component of the park's resources management plan, defining and programming the activities required to perpetuate and provide for the public enjoyment of those resources" (*Management Policies* 5:4).

The objectives of the cultural resource component of a resources management plan (RMP) are

(a) to summarize the cultural resource values and related mission and purposes of the park;

(b) to analyze the significance of resource management needs and problems and rank them in importance;

(c) to propose specific actions, including funding and staffing requirements, for dealing with the most important problems;

(d) to present a multi-year program to achieve measurable progress in accomplishing the proposed actions;

(e) to provide for an annual review and recording of accomplishments to measure the effectiveness of actions; and

(f) to provide a forum for an interdisciplinary approach to the park's resource management issues.

The resources management plan is part of a larger planning process described in the *Planning Process Guideline*. The RMP draws its major objectives from the park's comprehensive planning documents: the statement for management (SFM) and the general management plan (GMP). In turn, research and studies called for by the RMP may result in new knowledge that will influence the objectives and management needs previously defined in the SFM and GMP.

The RMP takes the resource management objectives a step further and describes a specific plan of action, which is used to prioritize requests for funding and to guide the expenditure of that portion of park base funds devoted to cultural resource management.

One of the objectives of the RMP is to foster integration of natural and cultural resource management actions in the park.

In addition to its introductory material, the RMP will contain

- a present resource status section summarizing and evaluating the condition and documentation of the park's cultural resources and major threats to them; and
- a resource management program section containing
- an overview that includes a summary of the major cultural resource issues, the strategies the park will use to address the most significant problems, and a discussion of unfunded needs;
- summary charts of structures, cultural landscapes, museum objects, archeological sites, and ethnographic resources; charts on personnel and funding; a list of currently funded actions; and a four-year priority listing of unfunded needs;
- individual project statements; and cultural resource documentation checklist.

A report of unfunded project and program needs will be submitted annually by March 31.

(For detailed guidance on the development of the RMP, see *Resources Management Plans: Planning and Software Manual*, 1994.)

D. Planning and Cultural Resource Considerations

Specific cultural resources require special consideration in planning. Here are some perspectives to keep in mind during the planning process:

1. Archeological Resources

a. Areas proposed for ground-disturbing activities will be surveyed for archeological resources prior to site selection. Development will not begin until the archeologist has submitted an archeological clearance report and Section 106 compliance has been completed. Plans and project documents will provide for the recovery and care of any archeological resources or data discovered during a project (see 36 CFR 800.11).

b. Because subsurface remains are subject to increased deterioration after exposure and can present safety hazards, plans should prescribe the backfilling of all excavated sites not essential for interpretation or other purposes. Limits of excavation should be marked so that they may be recovered in the future.

c. In compliance with federal law, plans keep the locations of archeological sites confidential to protect them from looting and vandalism.

2. Cultural Landscapes

a. Plans should reflect respect for a landscape's period(s) of historical significance and the features, patterns, and relationships contributing to its significance. Planners should realize that there is a lack of baseline data and contextual information for cultural landscapes, so that a landscape's significance and character-defining features may need to be determined as part of the planning process.

b. Planners should consult the park's inventory of cultural resources to determine what resources might be affected by the planning exercise.

c. Planners should consult cultural landscape specialists.

d. Planners should consider the possible adverse effects of vegetation screening, ramps, waysides, signs, and changes in grade on cultural landscapes. New features should be characterized by compatible design, materials, and workmanship.

e. Planners should work with natural resource management specialists to ensure that natural resources are protected consistent with cultural resource objectives.

f. Decisions regarding public or administrative use of a cultural landscape– including the siting of new facilities, parking, etc.–should reflect knowledge of its condition and carrying capacity and the possible adverse effects of any required modifications.

3. Historic and Prehistoric Structures

a. Planners should consult the park's List of Classified Structures (LCS) to determine what structures might be affected by the planning exercise.

b. Plans should reflect respect for a structure's period(s) of historical significance and the features contributing to its significance and setting.

c. Decisions on the public or administrative use of a structure–its adaptive use or rehabilitation– should reflect knowledge of its condition and carrying capacity and the possible adverse effects of any required modifications for fire and life safety, accessibility, and climate control.

d. Materials that emit chemicals that are detrimental to structures and museum collections should be minimized.

4. Museum Objects (for more specific guidance see NPS *Museum Handbook*)

a. Plans for exhibit and storage spaces should address all preservation and protection standards and requirements. (See Director's Order 24, "Standards for NPS Museum Collections Management.")

b. Plans should address the installation of intrusion detection, fire detection, fire suppression, and environmental control systems appropriate to the nature of the museum collections and the structures housing them.

c. A structure's load capacity for museum and archival storage should be evaluated, especially in historic structures, by a structural engineer familiar with historic and modern buildings.

d. Facility planners should consider the provision of loading docks and double doors to storage spaces for large and heavy objects and receiving rooms for processing acquisitions. Freight elevators also facilitate the movement of objects in storage areas. Stairs should be avoided.

e. Museum and archival collections should have dedicated storage, separate from maintenance and other activities, above grade and outside floodplains, with security and fire protection systems and climate-control capabilities to provide a constant environment.

f. Planning must give priority to preventive conservation principles.

5. Ethnographic Resources

a. Plans should consider the privacy of traditional user groups and their desire to continue cultural activities without intrusion from visitors.

b. Visitor circulation and use patterns should avoid sacred places.

c. Tribal leaders and elders should be consulted regarding appropriate planning involving museum objects or lands they use or value.

d. The reasoning behind the need for and the nature of any ethnographic study must be explained in writing to the affected group before the study begins.

e. Groups selected by the NPS for ethnographic studies have the right to reject or modify the proposed research designs for such studies. For example, a Native American tribe may be willing to work with NPS scientists to ensure that plants harvested for traditional uses are not endangered or overharvested. This same group, however, may not see the need to share or detail the cultural uses to which the plants are put. Under such circumstances, no studies should be undertaken by the NPS, although an ethnographer should be available to assist in resolving possible conflicts.

Standards

- A resources management plan is prepared for each park and reviewed every two to four years.
- Each park assesses the adequacy of its cultural resource information base and proposes in its resources management plan to correct deficiencies.
- Areas affected by construction, human use, or natural forces have a cultural resources survey sufficient to develop an information base upon which alternatives avoiding or minimizing adverse effects can be planned.
- Cultural resource specialists are full members of planning teams addressing predominantly cultural parks and are, at a minimum, consultants to planning teams addressing other parks with cultural resources. When appropriate, Native American leaders are invited to serve as consultants.
- Proposals for actions that may affect cultural resources are advanced only if sufficient data have been gathered to assess the probable effects.

- Proposals for actions that may affect cultural resources are reviewed at the earliest possible point by cultural resource specialists to ensure that all feasible measures have been or will be taken to avoid or minimize resource impairment. Unavoidable adverse effects are mitigated in accordance with this guideline.
- Decisions concerning the treatment and use of cultural resources are made and recorded in the park's general management plan or development concept plan(s) and programmed for accomplishment through the park's resources management plan.
- Sections 106 and 110 of the National Historic Preservation Act have been complied with in accordance with the regulations of the Advisory Council on Historic Preservation (36 CFR 800) and "Guidelines for Federal Responsibilities under Section 110 of the National Historic Preservation Act" (53 FR 4728).
- In cases involving ethnographic resources and ethnographic museum objects, associated Native American and other ethnic groups are consulted and their concerns are taken into account.

CHECKLIST FOR PLANNING

- Purpose of park is established.
- Legislative and management constraints are identified.
- Existing surveys and studies are reviewed, and additional research is programmed if needed.
- Park's cultural resources are identified and evaluated, using historical contexts.
- Park's interpretive theme(s) is/are determined for interpretation, resource management, and regional planning purposes.
- Condition of cultural resources is assessed.
- Objectives for managing cultural resources are developed.
- Issues needing resolution are identified.
- Objectives and issues relating to cultural resources are incorporated into park's statement for management.
- General management plan or development concept plan is initiated to develop alternatives to resolve issues and conflicts.
- Appropriate uses for cultural resources are identified, and ultimate treatments of cultural resources are determined.
- Interested parties are consulted, and compliance with necessary laws is completed.
- Alternatives are evaluated based on avoiding or minimizing harm to cultural resources.
- Preferred alternative is implemented.
- Resource management needs and priorities are addressed in park's resources management plan.
- A multi-year cultural resource program proposes specific actions for dealing with the most significant problems.
- Cultural resources outside park boundaries are considered through the planning process with active participation of neighboring jurisdictions.

CHAPTER 4: STEWARDSHIP

The national park system is composed largely of parks established for the significance of their resources. In creating the National Park Service, Congress directed it to preserve these resources. Resource preservation is the paramount charge to park managers and the focus of park operations.

A park's resources may vary widely. Few parks established primarily for their cultural values lack natural resources, and nearly all parks established for their natural resources also have cultural resources. At Yellowstone National Park, Old Faithful Inn is a national historic landmark. Indiana Dunes National Lakeshore contains both a national historic landmark (Bailly Homestead) and a national natural landmark (Cowles Bog). Cultural landscapes always comprise both natural and manmade elements. Museum collections, whether they contain cultural or natural items, are managed as cultural resources. Many ethnographic resources are natural objects or features.

Sometimes cultural and natural resource interests conflict, as when unwanted vegetative growth threatens to impair a historic structure's integrity or intrudes upon a cultural landscape. Safety, accessibility, and other operational concerns often enter the resource preservation equation. The most important management measures directly affecting cultural resources are controlled by park superintendents. With understanding of their parks' purposes, NPS policies, and the resources in their custody, managers can respond effectively to competing pressures and needs and good resource management can take place.

Standards

- Pending planning decisions, cultural resources are preserved and protected in their existing forms.
- Every treatment project is supported by an approved proposal, plan, or report appropriate to the proposed action.
- The appropriate level of Section 106 compliance is accomplished before executing a treatment project.
- Sufficient lands and interests in lands are acquired to ensure protection of cultural resources associated with a park's purpose.

A. Visitor Experience

A park, according to standard dictionary definitions, is a tract of land set aside for public recreational use. If resource preservation were the sole objective or an end in itself, Congress would have established something other than parks and a park service to manage them. Instead, in the 1916 act creating the NPS, it directed that the special resources in these reserved lands be conserved for public enjoyment then and thereafter.

The legal mandate to both conserve and provide for public enjoyment seems to hold potential for conflict. In fact, the Service's primary responsibility is clear. It may provide for public enjoyment of park resources only "in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." In other words, preservation takes precedence.

The NPS will continue to provide campgrounds, roads, picnic areas, visitor centers, hiking trails, and concession facilities and services to help visitors enjoy park resources. In planning for needed facilities and in providing for visitor use activities, good managers will not subordinate resource preservation to "better" visitor experiences. Rather, they will ensure that visitor facilities and activities are compatible with the preservation of resources and with an atmosphere conducive to their appreciation.

1. Interpretation

Interpretation, the public face of the National Park Service, can be a powerful tool for the preservation of cultural resources. To make it serve this purpose, interpreters must be well-versed in both the

significance of their parks' resources and the Service's policies, standards, and guidelines for managing them. By communicating why resources have been set aside and should be preserved along with the "park story," interpreters can enlist more stewards in their protection. (See the Interpretation Guideline [NPS-6], particularly Chapter 1, "Role and Responsibility of Interpretation," for further discussion of this topic.)

This sort of interpretation should not be limited to visitors. Interpretation directed to NPS employees can increase awareness of the centrality of resource preservation to the national park system. This, in turn, can foster a stronger preservation ethic within the Service by developing a better understanding of what it is trying to accomplish and why. Interpretation directed to and involving park neighbors and others, including indigenous people, with special interests in parks can foster mutual respect, help build partnerships, and contribute to achieving preservation goals.

2. Accessibility

NPS *Management Policies* (5:14) prescribes "the highest feasible level of physical access for disabled persons to historic properties, consistent with the preservation of the properties' significant historical attributes." It sanctions "some impairment of some features" to provide access but directs that modifications "will be designed and installed to least affect the features of a property that contribute to its significance." The NPS, as a federal agency, is subject to the Architectural Barriers Act of 1968, Section 504 of the Rehabilitation Act, and their implementing regulations and guidelines. Thus, the *Uniform Federal Accessibility Standards* (UFAS; 41 CFR 19.6; 49 FR 31528) guide accessibility modifications to historic structures in the national park system. The procedures outlined in UFAS (UFAS 4.1.7) will be followed when preservation and accessibility interests conflict. Because park concessioners are private businesses acting as agents of the NPS, access to their facilities is governed by the Architectural Barriers Act, UFAS, and the Americans with Disabilities Act (ADA) of 1990 (P.L. 101-336) and its implementing ADA Accessibility Guideline (ADAAG). Where provisions of UFAS and ADAAG differ, the more stringent requirement will apply. The provisions of ADAAG also apply to those few in-park private commercial activities whose purpose is not primarily to serve park visitors; some activities carried out under the historic property leasing program may fall in this category.

Although UFAS and ADAAG address structures and their immediate environs, the spirit of the standards should also be applied in planning access to cultural landscapes, archeological sites, and historic trails, consistent with *Management Policies* (9:3). (See also *Accommodation of Disabled isitors at Historic Sites in the National Park System*, 1983.)

B. Facilities

1. Park Design

Well-executed design sensitive to the cultural and natural environment is essential to protect cultural resources and their settings and to develop and maintain a harmonious overall park scene that meets contemporary needs. The goal of park design is to provide for new facilities or new or changing uses of historic properties while maintaining harmony and continuity with those special visual and cultural features that create a sense of time and place unique to each park.

While design standards like those in the *Housing Design and Rehabilitation Guideline* (NPS-76) and generic structure designs are intended to ensure a Service-wide quality level, project-specific design should reflect the cultural, regional, and aesthetic values of each location. Elements to be considered in the park design process, particularly when development takes place in or near cultural zones, include scale, texture, continuity of architectural style or tradition, physical and visual relationships, and consistency with the *Secretary of the Interior's Standards for Treatment of Historic Properties* and other management standards in this guideline. Properly executed design and development defers to the cultural landscape.

2. Maintenance Management, ICAP, and Preservation Maintenance

Continuing preservation maintenance is the stewardship key to protecting the integrity of cultural resources and the investments made to bring them to maintenance condition. Further, continuing

preservation maintenance is the surest way to avoid large future outlays of project money. A well-planned and executed maintenance program is an essential part of a park manager's performance.

The NPS Maintenance Management (MM) program includes the planning, organizing, directing, and controlling of maintenance activities. The computerized implementation program, Maintenance Management System (MMS), also provides information to higher management levels, permitting accomplishments to be identified and needs to be articulated on a Service-wide basis.

The Inventory and Condition Assessment Program (ICAP) module of the Service's MM program provides those managing maintenance activities, including preservation maintenance, with information on a park's assets and their condition. The Historic Property Preservation Database provides work procedures. These tools enable managers to develop goals for a park's maintenance program, prepare a preventive maintenance program, set priorities, and allocate resources to achieve those goals based on objective information. ICAP also develops data for the MM program to identify major deficiencies hindering achievement of the park's goals. (For further information see the *Inventory and Condition Assessment Program Reference Manual*, 1993.)

Standards

- Each park implements the Inventory Condition and Assessment Program for all historic resources.
- Each park completes and follows its Historic Property Preservation Database work procedures; pending the completion of such procedures, preservation treatment is conducted according to the maintenance standards in Chapter 8 of this guideline.
- Each park prepares and implements an annual maintenance schedule identifying work to be done and funding and personnel needed.
- Housekeeping, routine, and cyclic work mitigating wear and deterioration are accomplished without altering the appearance or basic material of cultural resources.
- Repair or in-kind replacement of deteriorated features is undertaken to keep the existing appearance and function of cultural resources.
- Stabilization work necessary to protect damaged historic material from additional damage is accomplished.
- Action is taken to prevent damage to and minimize deterioration of museum objects by practicing preventive conservation or performing suitable treatments.
- All preservation maintenance work is consistent with the *Secretary of the Interior's Standards for Treatment of Historic Properties* and other management standards in this guideline and is carried out following applicable requirements of Section 106, 36 CFR Part 800, and the 1995 Servicewide Programmatic Agreement.

3. Energy Conservation and Historic Preservation

Law and regulation require that federal agencies reduce energy consumption. Following energy surveys, strategies for retrofitting historic structures and other structures containing museum property for energy conservation will be developed. The nature of energy reduction measures will be determined on a case-by-case basis. When energy conservation and historic preservation mandates conflict, means to ensure the preservation of historic material and character will be developed.

Because retrofit measures can cause irreparable damage to the material and character of historic structures, plans for such measures must be reviewed by a historical architect. Revised operating procedures and modifications to existing mechanical systems will be considered before measures involving intervention in historic material or affecting historic character.

Examples of concerns include the installation of storm windows and doors, which may impair a historic structure's character. Blown-in or foam insulation may cause excessive condensation in walls or be a health hazard and should not be used. (See the Department of the Interior's Energy Survey Manual [1979], Ch. M, p. 8.)

Any action that will affect the temperature, relative humidity, light, or air quality in a historic structure containing historic furnishings or other museum objects must be considered in light of the effect it will have on both the structure and its contents. When the preservation needs of a historic structure and its contents conflict, means of ensuring that neither are unacceptably compromised must be developed. A curator and a historical architect are the primary professionals charged with developing resolution alternatives in such situations. Such alternatives may take into account the relative portability of the structure's contents. A curator will always review plans for retrofitting projects when museum property is involved.

In reviewing proposed retrofit actions, historical architects and curators will consider whether (1) the evaluation of effect for compliance purposes is adequate; (2) the proposed action is planned and will be conducted in accordance with relevant management policies, guidelines, and standards; and (3) the proposal incorporates all feasible measures to minimize any adverse effects on cultural resources.

4. Commemorative Works and Plaques

A commemorative work or plaque will be placed in a park only when authorized by Congress or approved by the director (36 CFR 2.62) or the official to whom approval authority has been delegated. Review of a proposed commemorative work or plaque will consider such things as the appropriateness of the site and the design, inscription, and materials of the feature to ensure that it will be compatible with its setting and the park's purpose, accurate, and easily maintainable. (For further guidance see *Management Policies*, 9:17.)

C. Protection

The protection of people and the protection of resources are the primary concerns of park management. Both require careful planning. When conflicts between the two arise, good judgment is necessary to resolve them. Resolution should avoid actions compromising the integrity of cultural resources and their settings. Harmful or intrusive measures may often be obviated by changing existing or contemplated uses of resources or by restricting access to them.

1. Safety

"The saving of human life will take precedence over all other management actions" (*Management Policies*, 8:5). This unequivocal policy statement is the starting point for all planning and operations involving visitors and employees. Both the *Management Policies* and the *Loss Control Management Program Guideline* (NPS-50) recognize that public use of park resources sometimes involves elements of risk. Both recognize the need for management actions to limit risk to acceptable levels, consistent with acceptable levels of impact on cultural resources. Where modifications necessary to make a cultural resource safely accessible would unacceptably compromise its significant qualities, the resource will be closed to public access.

The *Loss Control Management Program Guideline* directs each park to have a documented safety program and outlines a methodology of inspection and hazard abatement. The principles of the risk assessment process outlined in the NPS *Museum Handbook*, Part I, Museum Collections (Chapter 9 [1996] and Appendix G [1996]), also apply to safety concerns. An objective risk assessment process involving loss control, cultural resource, and management expertise will help ensure that both safety and cultural resource concerns are carefully considered and that informed decisions are made.

Reaching informed decisions can be complex. For example, Navajo culture dictates that a hogan in which someone has died be abandoned. In time it will deteriorate and become a safety hazard. It will also become a cultural resource that is losing integrity. The loss control perspective would be to demolish the hogan. The normal cultural resource management perspective would be to stabilize it for preservation and public access. From an ethnographic perspective, either course would be inappropriate because it would interfere with a cultural tradition that should be respected. From this perspective the proper course would be to restrict public access and allow the hogan to deteriorate. This case illustrates the need for full knowledge of resources and interdisciplinary involvement in decision-making.

2. Physical Security

Providing for the physical security of cultural resources is an essential part of their stewardship. Prevention, the best form of protection, is the focus of an effective park crime prevention and physical security plan. In developing such plans and implementing designs, sensitivity to cultural and natural museum property, historic materials, character, and setting is vital. The installation of alarms, locks, fencing, and other security devices in archeological sites, cultural landscapes, and historic structures should follow careful consideration of their physical and visual impacts in consultation with historical architects, historical landscape architects, archeologists, and curators as appropriate. (For further guidance see the Law *Enforcement Guideline* (NPS-9), Section III, Chapter 7, and the NPS *Museum Handbook*, Part I, Museum Collections, Chapter 9.)

3. Law Enforcement

Because law enforcement and protection rangers carry the primary responsibility for enforcing laws and regulations in the parks, they must be kept aware of the protection needs of cultural resources. It is recommended that rangers complete the forty-hour Archaeological Resources Protection Act course. In addition, involving rangers in planning activities related to cultural resources will help them better understand their archeological resources protection responsibilities and help prevent or reduce risks to resources from criminal activity. (For further guidance see the *Law Enforcement Guideline* and the NPS *Museum Handbook*, Part I, Museum Collections, Chapter 9 [1996] and Appendix G [1996].)

4. Archaeological Resources Protection Act and Antiquities Act

The Archaeological Resources Protection Act (ARPA) authorizes a permit system for investigating archeological resources at least 100 years old on public and tribal lands. It also establishes penalties for excavating, removing, or damaging such resources without authorization. Resources removed and vehicles and equipment used in connection with a violation are subject to forfeiture. The act permits information about the location and nature of archeological resources to be kept confidential, as does Section 304 of the National Historic Preservation Act. Training in the act and its regulations should be given to rangers, archeologists, managers, and others involved in their enforcement and implementation. The act also calls for the establishment of a program to increase public awareness of the significance of archeological resources.

The Antiquities Act provides legal protection for archeological resources not covered under ARPA (generally, archeological resources less than 100 years old).

(For further guidance see the *Law Enforcement Guideline*; 43 CFR Part 7, *Protection of Archaeological Resources*; and 43 CFR Part 3, *Preservation of American Antiquities*.)

5. Emergency Management

From time to time emergencies arise in parks, centers, and other locations with cultural resources. Staffs must respond to avert disaster, protect life and property, and restore order with the goal of resuming normal operations as quickly as possible. Emergency operations plans (EOPs) can help them do so.

Managers should thoroughly consider the protection of cultural resources when preparing EOPs. EOPs should identify the potential threats to cultural resources and prescribe ways to mitigate against, respond to, and recover from them. Cultural resource specialists should be included on incident management teams. Staff responsible for EOP preparation and cultural resource protection should become familiar with the following policies, guidelines, and procedures as part of their planning efforts:

Departmental Manual, 485:1.1, "Safety Management."

Management Policies, Chapter 8, "Emergency Preparedness and Emergency Operations."

Loss Control Management Program Guideline for various safety and occupational health issues.

Museum Handbook, Part I, Museum Collections, Chapter 9, "Museum Collections Security and Fire Protection" (1996), and Chapter 10, "Emergency Planning."

6. Land Acquisition and Management

To best protect the cultural resources for which it is responsible, the NPS should have management control over a land base sufficient to prevent changing uses outside the sphere of management control from degrading the resources. Interests acquired can range from fee simple title to restrictive easements, depending on what is deemed necessary to accomplish preservation and protection goals. Park land protection plans will identify the lands and interests needed to protect cultural resources.

Protection of cultural resources in newer, partnership parks call for a variety of approaches including technical assistance to property owners and working with local planning and zoning authorities.

Archeological resources, historic structures, cultural landscapes, and submerged cultural resources on lands subject to easements, occupancy agreements, or state ownership should be maintained in a manner consistent with the purposes for which the lands or easements were acquired. Agreements for such properties needing stabilization or rehabilitation should contain provisions for bringing them to a maintenance condition and maintaining them to standard.

When a state maintains ownership of submerged lands in national parks, it generally also maintains ownership of submerged archeological and historic resources, including abandoned shipwrecks and hulks. These resources should be protected and maintained for scholarly research and public enjoyment. Agreements between the NPS and the state should specify how such state-owned resources are to be managed. For further guidance see the NPS's Abandoned Shipwreck Act Guidelines (55 FR 50116, Dec. 4, 1990; 55 FR 51528, Dec. 14, 1990; 56 FR 7875, Feb. 26, 1991).

7. Pest Management

Integrated pest management (IPM) is the environmentally sensitive NPS program for dealing with unwanted and destructive plant and animal pests, some of which threaten park cultural resources. *Management Policies* (4:13-14) makes clear that dealing with such pests is a balancing act requiring close cooperation between cultural resource and IPM specialists. The goal is always to avoid unacceptable harm to both cultural resources and their environment. Guidance in developing and implementing an IPM program is contained in the *Natural Resources Management Guideline* (NPS-77) and NPS *Museum Handbook*, Part I, Museum Collections (Chapter 5).

D. Fire Management

1. Structural Fire

A structural fire plan treating prevention, detection, and suppression, including special procedures for fighting fire in historic structures and structures housing museum property, is required for each park. Pre-suppression planning should be a cooperative effort involving all agencies that would be involved in fire suppression. Because the best-managed fire is the one that didn't happen, fire plans should stress fire prevention. Fire prevention planning should consider lightning protection systems. Fire detection and suppression systems are key ingredients in long-term planning for protecting cultural resources from fire. Fire-fighting procedures acceptable for most structures may need to be modified to ensure maximum protection of cultural resources. Staff charged with developing fire prevention and fire-fighting plans and cultural resource specialists should consult closely when plans for historic structures or those housing cultural resources are developed. They should consider the variety of sources historically causing fires in the types of structures for which the plans are being written and develop specific procedures and training for fighting them. Those in and outside the Service who will be called upon to fight fires should be made intimately familiar with the structures and their contents and be given frequent refresher orientations. Cooperative agreements with outside organizations should recognize the special conditions and requirements for fighting fires when cultural resources are involved.

Staff responsible for structural fire planning should become familiar with the following policies, guidelines, codes, and standards:

Management Policies, Chapter 5, "Fire Detection and Suppression," and Chapter 13, "Structural Fire Protection and Suppression."

Loss Control Management Program Guideline, Chapter 18, "Fire Safety."

Structural Fire Guideline (NPS-58), Chapter 13, "Historic Structures."

Museum Handbook, Part I, Museum Collections, Chapter 9 (1996) and Appendix G (1996).

NFPA 70, "National Fire Code."

NFPA 101, "Life Safety Code."

NFPA 910, "Recommended Practice for Protection of Libraries and Library Collections" (1991).

NFPA 911, "Recommended Practice for Protection of Museums and Museum Collections" (1991).

NFPA 913, "Recommended Practice for Protection of Historic Structures and Sites" (1987).

NFPA 914, "Recommended Practice for Fire Protection in Rehabilitation and Adaptive Reuse of Historic Structures" (1989).

2. Wildland and Prescribed Fires

With wildland and prescribed fires, as with structural fires, a paramount concern is resource protection, both cultural and natural. To ensure that fire management plans address cultural resource concerns, cultural resource specialists should participate in their preparation. In addition, staff charged with fire management should be informed about significant archeological sites whose locations are confidential. Plans should also make provision for archeological surveys to precede fire line construction, for protecting cultural landscape features, and for dealing with ethnographic concerns. Additionally, post-fire terrain rehabilitation for cultural resources may need to be included in follow-up activities. (For further guidance see the *Fire Management Guideline* [NPS-18], Executive Summary and Chapters 2 and 5.)

E. Administration

1. Budget

The importance of a well-formulated budget program for cultural resources management cannot be overemphasized. Without proper funding, an effective cultural resource management program cannot be carried out. Program formulation entails completing clear, succinct Development/Study Package Proposal forms (Form 10-238). The Full Package Description and Package Justification/Consequences sections are especially important, for they are used to set funding priorities. In some instances, resources management plan project statements are written to contain all the programming data required for 10-238s, given package numbers, and used as programming documents in place of 10-238s. In either case, resources management plans are the primary sources for data to support cultural resource management budget requests. Fiscal management and cultural resource staff members are available for consultation in preparing programming documents.

The sources for funding cultural resource management include base funding, the cultural resources preservation program, cultural cyclic maintenance, the backlog cataloging program, the museum collection preservation and protection program, the repair and rehabilitation program, regular cyclic maintenance,

line-item construction, special emphasis programs, and lump sum construction. Donations also sometimes support cultural resource management activities. Understanding these fund sources and the types of projects for which they are appropriate is necessary in formulating an effective cultural resource management program. Budget staff and cultural resource personnel can provide information and guidance in this area.

2. Personnel

a. Recruitment

Cultural resource specialists are qualified professionals who initiate, make recommendations about, coordinate, carry out, and supervise cultural resource programs and research. In most cases, professionals with specific knowledge, skills, and abilities (KSAs) beyond the minimal qualifications in the Office of Personnel Management (OPM) *Personnel Qualifications Standards Handbook* (X-118) are sought for cultural resource positions. The goal is to match people with the best combination of knowledge, skills, and abilities to the specific positions being filled.

It is important that the recruiting manager describe with precision and clarity the professional qualifications needed for the position. The journey level for the following cultural resources professional positions is GS-11: historian, 170; archeologist, 193; landscape architect, 807; historical architect, 808; anthropologist, 190; curator, 1015; archivist, 1420. (For localized, small, and stable museum collections the journey level curator may be GS-9.) The better a position description is written, the more likely it is that there will be applicants with the needed knowledge, skills, and abilities. KSAs are, in effect, special qualifications. They are used within the merit promotion system and may be submitted to OPM in some cases when OPM is requested to recruit candidates. (See Appendix E for examples of qualifications that could be used as selective or quality ranking factors. For further information in formulating KSAs and selection factors, consult personnel staffing specialists.)

b. Training

Employees who treat or manage cultural resources must know and understand the cultural resource management policies adopted by the NPS. Managers, planners, maintenance staff, cultural resource specialists, interpreters, and others should receive policy training as soon as their duties involve dealing with cultural resources.

Because of the nature of cultural resources and the special skills needed to deal with them, specialized training is quite often needed to ensure that people working with them have the proper combinations of skills. A highly qualified carpenter may need training in ancient joinery techniques; an archeologist may need geographic information system skills to better and more accurately document sites; a curator may need computer skills to better manage and study collections. Skills development can be accomplished through formal training and workshops, mentoring relationships, on-the-job training, participation in the activities of trade and professional societies, and reading professional publications and periodicals. (See *Essential Competencies for National Park Service Employees*, 1996.)

Cultural resource training is available through a variety of sources including the NPS, American Association for State and Local History, National Trust for Historic Preservation, Association for Preservation Technology International, Society of American Archivists, museums, colleges and universities, and historical societies. (See also NPS *Museum Handbook*, Part I, Appendix C, "Professional Organizations and Societies," and the annual issue of *CRM* entitled "A Directory of Training Opportunities in Cultural Resources Management.") With the goal of increasing the quality of care resources receive, training should be encouraged and expanded. Whatever the nature of the training, it should be documented in employee records.

CHAPTER 5: COMPLIANCE WITH SECTION 106 OF THE NATIONAL HISTORIC PRESERVATION ACT

In the National Historic Preservation Act of 1966, Congress declared that "the historical and cultural foundations of the Nation should be preserved as a living part of our community life and development in order to give a sense of orientation to the American people." Passed in response to the destruction of historic and prehistoric resources by federally sponsored actions such as highway construction, water impoundments, and urban renewal, the act requires federal agencies to establish programs for evaluating and nominating properties to the National Register of Historic Places and to consider the effects of their undertakings on listed or eligible properties.

A. Section 106 of the National Historic Preservation Act

Section 106 mandates that federal agencies take into account the effects of their actions on properties listed or eligible for listing in the National Register and give the Advisory Council on Historic Preservation a reasonable opportunity to comment. While it does not require the preservation of such properties, it does require that their historic or prehistoric values be considered in weighing the benefits and costs of federal undertakings to determine what is in the public interest. Its practical effect is to encourage agencies to seek ways to avoid or minimize damage to cultural resources. Agencies must recognize properties important to communities as well as to the nation as a whole, so they need to be aware of the interests of local groups and individuals. The goal of the process is to make sure that preservation is fully considered in federal actions, thereby protecting our shared heritage from thoughtless or ill-considered damage.

Section 106: The head of any Federal agency having direct or indirect jurisdiction over a proposed Federal or federally assisted undertaking in any State and the head of any Federal department or independent agency having authority to license any undertaking shall, prior to the approval of the expenditure of any Federal funds on the undertaking or prior to the issuance of any license, as the case may be, take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register. The head of any such Federal agency shall afford the Advisory Council on Historic Preservation established under Title II of this Act a reasonable opportunity to comment with regard to such undertaking.

The Advisory Council's regulations, *Protection of Historic Properties* (36 CFR Part 800), define the process of review and consultation by which federal agencies must take into account the effects of their undertakings and enable the Council to comment. The regulations emphasize participation in this process by state historic preservation officers (SHPOs) and the public, including Native American groups.

The regulations are important both as procedure and as guidance to the main issues and thought processes involved in Section 106 compliance. In some cases affected resources or the effects of an undertaking on them can be readily assessed and the procedures may be compressed.

The regulations emphasize starting the Section 106 process early in planning an undertaking, when the greatest range of alternatives is open. This means integrating Section 106 review into National Park Service processes for long-range planning and park operations and, as appropriate, coordinating with procedures in the *Planning Process Guideline* (NPS-2) and the *NEPA Guideline* (NPS-12). A Servicewide Programmatic Agreement, discussed below, sets up a framework for Section 106 review of park planning documents.

B. Section 110 of the National Historic Preservation Act

This section of the law gives federal agencies positive responsibility for preserving historic properties in their ownership or control. It calls for them to use such properties, where feasible and compatible with their preservation, in preference to acquiring, constructing, or leasing others. Agencies are also directed to establish preservation programs to identify, evaluate, protect, and nominate to the National Register historic properties under their ownership or control, whether they are of significance at the local, state, or national level. The law emphasizes cooperation with SHPOs in establishing such programs.

Under Section 110, park managers need to set priorities and long-range strategies for comprehensive inventories of all park lands to identify Register-eligible properties, using resources management plans and other budget and management tools. NPS staff should confer with SHPOs about designs for and results of cultural resource surveys and about historic contexts for evaluating properties. In evaluating park properties, use of relevant historic contexts developed by SHPOs is most efficient and aids integration of park planning with state processes. Inventories should include resources believed ineligible for the National Register as well as those believed eligible.

Section 110 guidelines have been published to aid federal agencies in meeting these provisions. These are available from the Heritage Preservation Services Program in the NPS National Center for Cultural Resources Stewardship and Partnership Programs.

Section 106: Section 110(a)(1): The heads of all Federal agencies shall assume responsibility for the preservation of historic properties which are owned or controlled by such agency. Prior to acquiring, constructing, or leasing buildings for purposes of carrying out agency responsibilities, each Federal agency shall use, to the maximum extent feasible, historic properties available to the agency. Each agency shall undertake, consistent with the preservation of such properties and the mission of the agency and the professional standards established pursuant to section 101(f), any preservation, as may be necessary to carry out this section.

Section 106: Section 110(a)(2): Each Federal agency shall establish . . . a preservation program for the identification, evaluation, and nomination to the National Register of Historic Places, and protection of historic properties. Such program shall ensure–

(A) that historic properties under the jurisdiction or control of the agency, are identified, evaluated, and nominated to the National Register;

(B) that such properties under the jurisdiction or control of the agency as are listed in or may be eligible for the National Register are managed and maintained in a way that considers the preservation of their historic, archaeological, architectural, and cultural values in compliance with section 106 and gives special consideration to the preservation of such values in the case of properties designated as having National significance;

(C) that the preservation of properties not under the jurisdiction or control of the agency, but subject to be potentially affected by agency actions are given full consideration in planning;

(D) that the agency's preservation-related activities are carried out in consultation with other Federal, State, and local agencies, Indian tribes, Native Hawaiian organizations carrying out historic preservation planning activities, and with the private sector; and

(E) that the agency's procedures for compliance with section 106–

(i) are consistent with regulations issued by the Council pursuant to section 211;

(ii) provide a process for the identification and evaluation of historic properties for listing in the National Register and the development and implementation of agreements, in consultation with State Historic Preservation Officers, local governments, Indian tribes, Native Hawaiian organizations, and the interested public, as appropriate, regarding the means by which adverse effects on such properties will be considered; and (iii) provide for the disposition of Native American cultural items from Federal or tribal land in a manner consistent with section 3(c) of the Native American Graves Protection and Repatriation Act (25 U.S.C. 3002(c)).

Comprehensive survey work geared to National Register criteria can greatly facilitate the Section 106 process, because the first steps in the process are identification and evaluation of properties to determine whether they are Register-eligible. As indicated in the Advisory Council's regulations (36 CFR 800.4[c][1]), however, previously evaluated properties may need to be reevaluated as time passes and ideas about significance change. This may entail new research as well as review of existing documentation.

C. Responsibilities of the Superintendent

For purposes of Section 106 and the Advisory Council's regulations, park superintendents are the "agency officials" responsible for adherence to policies and legal procedures in NPS activities under their jurisdiction. Superintendents set management priorities that largely determine the framework for carrying out the mandates in Sections 106 and 110 through long-range planning and operational decisions. They inform and involve appropriate cultural resource specialists, SHPOs, and others about park needs and priorities. Gaps in baseline data on cultural resources, staffing, funding, and training needs are among their concerns.

Superintendents ensure that all undertakings in their parks, including those carried out by the Denver Service Center (DSC) or outside parties, are identified, documented, and considered as appropriate for purposes of Section 106 review. They begin the process early enough to meet NPS legal and regulatory responsibilities and use formats providing the information required in 36 CFR Part 800. They involve interested parties and the public in park planning processes as needed to fulfill responsibilities under 36 CFR Part 800. They see that undertakings are carried out in accordance with any conditions or stipulations that resulted from the Section 106 process. Section F.5 below discusses the superintendent's role in preparing park-specific programmatic agreements for Section 106 compliance.

Superintendents designate a park Section 106 coordinator to provide day-to-day staff support in all these areas and to serve as liaison among park, DSC, support office, and other staff members involved in undertakings and park CRM. The superintendent should see that the park coordinator, and park staff generally, receive appropriate training. The Section 106 coordinator's position description and performance standards should include his or her role in Section 106 compliance.

The superintendent also selects CRM specialists qualified to provide technical and professional advice and services needed for Section 106 purposes. They may be on the park staff or in other parks, support offices, NPS centers, or elsewhere. These specialists provide CRM expertise in project formulation, development and review of Section 106—related documentation, and project monitoring.

D. Responsibilities of the Regional Director

Regional directors ensure that the park role in meeting Section 106 and other legal compliance responsibilities is covered in park managers' performance standards and park program evaluations. Regional directors are also available if SHPOs or the Advisory Council wish to bring a park issue to their attention.

E. When to Initiate Consultation

For purposes of Section 106, the Advisory Council's regulations define an undertaking as "any project, activity, or program that can result in changes in the character or use of historic properties" whether federal agency jurisdiction is direct or indirect. Actions carried out by or on behalf of a federal agency that could alter aspects of the location, design, setting, materials, workmanship, feeling and association, or use of a Register-listed or eligible property should be carefully considered to analyze possible effects on historic qualities and research potential. Continuing activities and any of their elements not previously considered under Section 106 are included in the definition of undertaking. Federal funding, licensing, permitting, or approval are included by law, as are projects or programs subject to state or local regulation administered pursuant to a delegation or approval by a federal agency. Undertakings include obvious interventions such as installation of new plantings or fences in a Register-eligible cultural landscape, rehabilitating historic park quarters, and ground-disturbing activity. Undertakings also include new construction that could affect the setting of a historic property and other actions that could introduce visual or audible elements out of keeping with its historic character. NPS involvement with, or requirements imposed on, concessioners or lessees

may include undertakings. Not every park activity is an undertaking, but those that have the potential to affect properties that meet National Register criteria, whether or not any such properties have been identified yet, are subject to Section 106 review. If a park is uncertain about whether an action is subject to review, advice from the park's CRM advisers or the SHPO should be sought.

Park program managers and supervisors collaborate with the superintendent or park Section 106 coordinator to ensure that cultural resource specialists are involved and consulted, and Section 106 documentation is prepared, in a timely manner. Cyclic maintenance programs, work orders, budget documents, and various plans can all provide valuable information for evaluating upcoming undertakings. Cultural resource specialists can help parks develop procedures and documentation.

If it appears that a project is an undertaking, Section 106 consultation should begin as the scope of a proposal or alternative proposals is identified. The process should start early in planning or project development so that comments received can be fully considered in shaping the undertaking or planning proposal. In planning and budgeting, the Section 106 process should be factored into NPS project schedules and coordinated with any required NEPA consultation. Consultation must not be delayed until a proposal has become unalterable, thus foreclosing the Council's and SHPO's opportunity to provide effective comment, or until a project may have to be deferred or canceled for procedural reasons.

F. The Regulatory Section 106 Compliance Process

1. Identifying Historic Properties (36 CFR 800.4)

All parks, including those established primarily for their natural or recreational resources, have responsibilities to identify historic properties potentially affected by undertakings. (For Section 106 purposes, historic properties are defined as prehistoric and historic districts, sites, buildings, structures, and objects listed or eligible for inclusion in the National Register. Cultural landscapes and archeological and ethnographic resources that meet Register criteria are included.)

At the earliest possible stages in project planning, several considerations should be addressed:

a) What is the undertaking's area of potential effect? It may extend beyond park boundaries. Evaluating where effects may occur in a broad, comprehensive way is a key factor in the rest of the Section 106 process.

b) What information exists about cultural resources in the area of potential effect? The published listings of National Register properties or the automated National Register Information System database should be consulted, but these include only properties already identified and evaluated. Often more information is needed to establish whether eligible properties exist in the area of potential effect. The List of Classified Structures, Cultural Sites Inventory, and documents such as historic resource studies and archeological reports should also be reviewed. SHPOs and other sources of archeological information may have relevant data. If Register documentation is not current and complete, inventories such as the LCS may indicate that a property is Register-eligible, but the scope and adequacy of such inventory data also needs analysis. The Advisory Council's regulations recognize that perceptions of significance may change as time passes, so it may be necessary to reevaluate whether a property is eligible for the National Register. Also, the characteristics that make a property eligible may not be adequately described in existing documentation and should receive thoughtful consideration.

c) What additional information is needed to determine whether other potentially eligible historic properties exist in the area of potential effect? Federal agencies are responsible for consulting the SHPO and other parties, including Native American groups, likely to be knowledgeable or concerned about this point. It may be necessary to have cultural resource specialists directly examine the area, especially when comprehensive survey work has not been conducted there before.

Properties identified in the area of potential effect must be evaluated according to the National Register criteria, in consultation with the SHPO. Generally speaking, if the SHPO and an agency agree in writing that a property is eligible or not eligible, that judgement is sufficient for Section 106 purposes. If there is

disagreement, the park requests a formal determination of eligibility from the Keeper of the National Register. Procedures for that process are in 36 CFR Part 63, "Determinations of Eligibility for Inclusion in the National Register of Historic Places," and are referenced in 36 CFR 800.4.

If no historic properties are found in the area of potential effect, the NPS must provide the SHPO and interested persons with documentation of this finding. (See the Advisory Council's *Identification of Historic Properties: A Decision-Making Guide for Managers* for more guidance.)

2. Assessing Effects (800.5)

The next major stage in the Section 106 process is to apply criteria of effect and adverse effect (specified in 36 CFR 800.9) to determine whether or not the undertaking will affect historic properties and whether any effects will be adverse. This too is done in consultation with the SHPO.

The office that plans and will undertake a project–usually park or DSC staff–prepares the Section 106 documentation, in consultation with CRM specialists and others as appropriate. The documentation provides information about historic properties in the area of effect and about the project's potential effects on those properties. See 36 CFR 800.8 and the Advisory Council's publication *Preparing Agreement Documents: How to Write Determinations of No Adverse Effect, Memoranda of Agreement, and Programmatic Agreements Under 36 CFR Part 800* for more information about documentation requirements. Appendix O has an NPS sample form, "Assessment of Actions Having an Effect on Cultural Resources," that may be helpful as a model format in some cases.

The park uses relevant cultural resource specialists as needed to develop project proposals, to review documentation, and to provide advice and assistance. They assess whether further information is needed to identify or evaluate historic properties and advise on other preservation issues, standards, policy, and techniques, in preparation for review by the SHPO and, as necessary, the Council. (Under the 1995 NPS Servicewide Programmatic Agreement, there are some specific exceptions to SHPO and Council review, known as programmatic exclusions, described in Section G below and Appendix P. These exclusions are documented and reviewed, like other undertakings, with the involvement of the park's relevant CRM specialist advisers. SHPOs and the Council may review these records upon request.)

The Advisory Council's criteria of effect require agencies to take a broad view of an undertaking's impact and its long-range implications. Does the undertaking have the potential to alter characteristics of historic properties such as location, design, setting, workmanship, materials, feeling, and association? Will it cause visual, audible, or atmospheric intrusions not in keeping with a property or its setting, or change the use of the property? Destruction, damage, and alteration of historic materials are obvious examples. Ground-disturbing activities, such as those that may result from modifications to buildings or landscapes, may affect archeological resources. Effects may result not only from actions having a direct physical impact on cultural resources, but also from undertakings near or visible from an eligible property inside or outside a park boundary. Often they result from actions not carried out for purposes of cultural resource management, such as the construction of a new maintenance facility or sewer line, or use of borrow pits or dumping sites on or off NPS lands. Even failure to take some action, whether deliberate or inadvertent, can result in an adverse effect under 36 CFR Part 800 when it constitutes "neglect of a property resulting in its deterioration or destruction." Indirect or less immediate effects such as increased visitor use, vandalism, and daily wear are also considered. Transfer, sale, or lease of a historic property may have an adverse effect unless adequate restrictions or safeguards are included in the transaction.

National Register documentation should always be examined in assessing an undertaking's effect on a listed property. Because Register documentation may be outdated or incomplete, however, do not assume that every aspect of a property's significance has been included in a nomination. Similarly, even if it has been established that an action will not affect one type of cultural resource, the NPS must consider whether previously unidentified cultural resources of different types may exist in the project area. For example, archeological survey of an area may not identify structures or cultural landscape values that should also be evaluated and considered. This is why it is important for the park Section 106 coordinator to involve a team of specialists representing all relevant cultural resource disciplines.

Application of the criteria of effect and adverse effect will yield one of three findings: no effect, no adverse effect, or adverse effect. (For more guidance, see the Advisory Council's *Preparing Agreement Documents*.)

a. Finding of No Effect

When the park finds that an undertaking will have no effect on National Register—eligible properties, regulations require notification of the SHPO and interested persons who have made their concerns known. If the SHPO does not object within 15 days, Section 106 responsibilities have been met. If the SHPO does object, the park proceeds to apply the criteria of adverse effect, again in consultation with the SHPO. Documentation of no-effect findings and evidence of consultation with SHPOs must be retained in park files. For DSC planning efforts, this documentation is also retained in the "Record of Statutory Compliance" files.

b. Finding of No Adverse Effect

If the park finds that there will be an effect but that it will not be adverse, it invites the SHPO to concur. If the SHPO agrees with the "no adverse effect" finding, the park sends the Advisory Council summary documentation on the undertaking including evidence of SHPO concurrence. If the Council does not object to the NPS finding within 30 days, the Section 106 process is complete, provided that the NPS meets any conditions or stipulations developed during consultation.

c. Finding of Adverse Effect

An undertaking may be in the public interest even though it will impair cultural resources. The Section 106 process is designed to ensure that decisions are made with full awareness of the nature of the resources affected and the specific effects an action will have, and that feasible ways to avoid or minimize adverse effects are fully considered and acted upon. Location or design alternatives, for example, may reduce if not eliminate potential damage. The loss of historic structures and archeological resources may be mitigated by recording and data recovery. The benefits to be derived from an undertaking do not constitute mitigation, however, and measures that minimize but do not avoid adverse effects do not justify a finding of no adverse effect, except as specified in 36 CFR 800.9(c)(1).

3. Consultation (800.5[e])

If an undertaking will adversely affect National Register—eligible properties, the park notifies the Advisory Council and enters into consultation with the SHPO about ways to avoid or mitigate the potential effect(s). Historians, archeologists, historical architects, ethnographers, curators, and cultural landscape architects may all play roles in this process as needed. This consultation generally results in a memorandum of agreement (MOA) recording any conditions that the NPS must meet in carrying out the undertaking. The Advisory Council may also participate in consultation; for adverse effects on national historic landmarks, it must do so.

Other interested groups and individuals, at their request, may be invited to act as consulting parties. The National Historic Preservation Act emphasizes federal agency responsibilities to consult with Indian tribes or Native Hawaiian organizations in carrying out Section 106 processes involving properties with traditional cultural or religious significance to them. Also, the NPS and other agencies provide opportunities for the public to be informed and express views. The Advisory Council's regulations encourage the use of each agency's procedures for public involvement, such as NEPA review, to meet this need. The Council's *Public Participation in Section 106 Review*, which provides more guidance in this area, indicates that agencies should involve the public "in a flexible manner that reflects the type of undertaking under consideration, the agency's administrative processes, and the nature of known or expected public interests."

4. Advisory Council Comment

If the Advisory Council did not take part in the consultation process on an adverse effect and sign the MOA as a participant, the park submits the MOA and other specified information to the Council for review. The Council has 30 days to accept the MOA, recommend changes to it, or decide to comment on the

undertaking. In the last instance, the Council has additional time to provide comments. It is important for the NPS to demonstrate that SHPO and Council comments have been fully considered in reaching a final decision about an undertaking.

5. Groups of Undertakings and Programmatic Agreements

Related or similar undertakings can be grouped for purposes of Section 106 review when their effects on historic properties are similar and repetitive and in some other cases. Programmatic agreements (PAs), described in 36 CFR 800.13, are the formal vehicles for such groupings of undertakings. They result from consultation among the park, the Advisory Council, and affected SHPOs.

Parks can use PAs to facilitate compliance for aspects of a park's operations that involve routine activities carried out repeatedly. A PA may cover day-to-day operational undertakings, or small repetitive projects that arise occasionally or seasonally, to avoid the inefficiencies of seeking comment on such activities as individual occurrences. The superintendent could also, for example, request Council and SHPO review of a maintenance program or a cultural landscape report as a cluster of undertakings. PAs can also be negotiated for programs and projects that involve regional planning or more than one state. If it is not possible to fully determine an undertaking's effects in advance, a PA can clarify procedures for meeting Section 106 responsibilities. A PA may also be an effective means of ensuring compliance when the NPS is involved in a cooperative effort, such as a national heritage corridor, where other parties have significant management responsibilities.

PAs are most likely to be developed successfully for parks whose cultural resources have been comprehensively surveyed, evaluated, and registered, enabling future activities to be planned and carried out in full awareness of their locations, types, and significance.

G. 1995 Servicewide Programmatic Agreement

The 1995 Servicewide Programmatic Agreement (text in Appendix P) tailors the Section 106 process to NPS program needs in certain ways. It recognizes that the NPS has qualified cultural resource specialists on staff and uses policies and guidelines, as well as the Secretary's Standards, to manage cultural resources consistent with the intent of the National Historic Preservation Act. This PA supersedes the 1979 Servicewide Programmatic Memorandum of Agreement (PMOA) and its amendments as well as the 1990 Servicewide PA.

One goal of the PA is to improve communications among NPS and SHPO offices about NPS programs related to Sections 106 and 110 of the National Historic Preservation Act. Another is to provide for early involvement by SHPOs and the Advisory Council in NPS planning processes, while giving them some flexibility to choose the degree of their involvement. Standard Section 106 consultation procedures are the framework for carrying out Section 106 review of undertakings in plans and should be coordinated with NPS planning processes.

1. Programmatic Exclusions (Stipulation IV)

Under the PA, for specified types of actions unlikely to have adverse effects on cultural resources–"programmatic exclusions"–NPS internal review for Section 106 purposes need not be followed by SHPO or Advisory Council review, *provided* that:

a. the undertaking is based on information adequate to identify affected cultural resources and evaluate their eligibility for the National Register, including not only archeological resources and historic structures but also cultural landscape and ethnographic values;

b. NPS internal review finds that the undertaking's effect on cultural resources will not be adverse; and

c. the undertaking will be carried out in conformity with applicable policies, guidelines, and standards; it must be documented and reviewed via appropriate procedures.

The specific types of undertakings that are programmatic exclusions are listed in Stipulation VI.B of the 1995 PA. *Although they are called exclusions, this means only that they are excluded from review by SHPOs and the Council if they meet the conditions specified in the PA. They must still be reviewed and documented within the NPS, using appropriate CRM advisers*.

2. Planning (Stipulation VI)

The PA also provides a framework for coordinating Section 106 review with NPS planning processes. General management plans (GMPs) and development concept plans (DCPs) may facilitate Section 106 consultation if the NPS has adequately identified and evaluated cultural resources and has information sufficient to apply the criteria of effect and adverse effect in 36 CFR 800.9. The process in 36 CFR Part 800, including provisions on documentation and agreement documents, applies to undertakings in plans. Under the PA:

a. The Advisory Council and SHPOs are informed and invited to advise the NPS about GMPs and DCPs (and other park plans as appropriate) beginning in early planning stages. Discussions before and during development of task directives or project agreements and in scoping processes can facilitate this process. Briefings and site visits may also be helpful. The issues analysis phase and the development of alternatives in the GMP process should include opportunities for the SHPO and Council to provide information and raise concerns. NPS requests for comment should specify that comments are sought under this PA.

b. To coordinate park planning with the Section 106 review process, NPS assesses information available on GMP and component undertakings, requests comment on undertakings under the Advisory Council's standard review procedures, and keeps track when further consultation is needed to complete the compliance process after plan approval. Generally the phase of developing alternatives is a timely point to confer with the SHPO about individual undertakings in the plan. The component undertakings are categorized depending on whether there is sufficient information to complete the 36 CFR Part 800 process during plan development or whether further consultation after approval of the plan will be required because of insufficient information. If consultation on a given undertaking can be completed during planning, the final plan includes documentation of this consultation, in keeping with 36 CFR Part 800. (An adverse effect determination, for example, will require documentation consistent with 800.5[e] and 800.6.) The final plan also includes a list of the undertakings on which further consultation is required.

If major changes, such as development of a new preferred alternative, occur after release of the public comment draft, the NPS confers with the SHPO and Council about those changes before preparing the final draft.

3. Cooperation and Communications (Stipulation IX)

The PA prescribes biennial meetings between parks and SHPOs to discuss compliance issues, and it encourages information sharing about cultural resource inventory and research efforts in conformity with Section 110 of the National Historic Preservation Act.

The PA also commits SHPOs and the Advisory Council to treat the NPS as an interested party when they are reviewing undertakings by other federal agencies that may affect NPS areas. Park superintendents should inform SHPOs of the Service's interests in nearby lands or projects.

CHECKLIST FOR PARK SECTION 106 COMPLIANCE

RESEARCH:

- The park has a realistic long-term plan for filling gaps in baseline data on cultural resources and nominating resources to the National Register and seeks funding to implement it.

PLANNING:

- The park staff works to ensure that Section 106 review is considered in scheduling and planning both operations and development.

STEWARDSHIP:

- All undertakings are appropriately documented and reviewed in accordance with 36 CFR Part 800 or any relevant programmatic agreements.
- Park has a designated Section 106 coordinator with training in Section 106 compliance procedures, and a designated set of CRM advisers to provide technical and professional advice and services for 106 purposes.
- Park has written procedures for its staff's Section 106 compliance responsibilities.
- Staff Section 106 responsibilities are recognized and described in position descriptions.
- Park staff receive training in Section 106 procedures appropriate to their role in the process.

CHAPTER 6: MANAGEMENT OF ARCHEOLOGICAL RESOURCES

A. Introduction and Objectives

Archeological resources occur in virtually every unit of the national park system. They are critical to understanding and interpreting American prehistory and history. They include prehistoric and historic period sites, materials found in museum collections, and the records associated with these sites and materials. They are often fragile and may be easily destroyed unless proper attention is paid to their management.

The management of archeological resources on park lands is mandated by law and policy. Of particular importance are the laws and regulations that specifically apply to the National Park Service, the NPS *Management Policies*, the Antiquities Act of 1906, Sections 106 and 110 of the National Historic Preservation Act, the Archeological and Historic Preservation Act, the Archaeological Resources Protection Act, the Abandoned Shipwreck Act, the Native American Graves Protection and Repatriation Act, and their respective implementing regulations, standards, and guidelines. A brief overview of these acts and other applicable laws and regulations can be found in Appendix B of this guideline.

This chapter provides guidance and standards for the management of archeological resources. The park superintendent is responsible for implementing and coordinating activities that affect these resources. He or she does this in consultation with archeologists and other specialists involved in planning, construction, and compliance at the park, support office, and NPS centers.

1. Types of Archeological Resources

Archeological resources are the physical evidences of past human activity, including evidences of the effects of that activity on the environment. What makes archeological resources significant are their identity, age, location, and context in conjunction with their capacity to reveal information through the investigatory research designs, methods, and techniques used by archeologists.

Archeological resources represent both prehistoric and historic time periods. They are found above and below ground and under water. Examples of prehistoric archeological resources include cliff dwellings, Indian mounds, petroglyphs, surface scatters of pottery fragments and chipped stone, campsites, and villages. Examples of historic archeological resources include archeological components of historic structures, battlefields, mining camps, forts, shipwrecks, and similar historic properties. A historic period house, for example, may have a broad variety of material culture associated with it (e.g., in construction trenches and trash pits) that can be examined effectively using archeological techniques. The remains of historic properties or of resource types not typically included in the historical record will have archeological value when they can reveal significant information. Examples of submerged archeological resources include sunken ships and aircraft and inundated prehistoric campsites and historic forts. The requirements to manage submerged resources are the same as for terrestrial resources.

Archeological remains in collections and the records that document them and their associated sites are also considered archeological resources and must be managed accordingly.

2. Program Objectives

Park managers are responsible for ensuring that archeological resources under their jurisdiction are identified, protected, preserved, and interpreted. This is done through a systematic program of inventory, evaluation, documentation, curation of collections and associated records, nomination of eligible resources to the National Register of Historic Places, monitoring, protection, treatment, and interpretation.

The NPS's systemwide archeological inventory program aims to locate, evaluate, and document archeological resources on park lands. Archeological inventories of parks are planned, programmed, funded, and conducted in accordance with each park cluster's archeological inventory plan and the requirements, standards, and priorities of the systemwide archeological inventory program. At a minimum, archeological overviews and assessments covering all park areas are required. Most parks will also require additional studies and activities as specified in the publication National Park Service's Systemwide Archeological Inventory Program (October 1992). Project statements for needed archeological identification and evaluation studies and related activities are included in a park's resources management

plan. The RMP includes project statements for other studies and activities needed to preserve archeological resources. Such studies and activities will often include periodic monitoring of sites subject to damage from natural processes (e.g., floods and erosion) and human activities (e.g., looting and vandalism); stabilization of damaged or threatened sites; and data recovery for research or interpretive purposes, for documentation purposes in advance of site stabilization or other preservation treatments, or for mitigation of adverse impacts.

Some parks have staff archeologists to provide direct support in achieving program objectives. Most parks must obtain this support from archeologists in support offices or archeological or preservation centers.

Standards

- Archeological research in a park is conducted in accordance with applicable NPS policies, guidelines, and standards. (They include the NPS *Management Policies* and this guideline; Director's Order 26, "Projects Must Fund Basic Preservation of Museum Collections They Generate"; the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation; the NPS's *Guidelines for Federal Agency Responsibilities Under Section 110 of the National Historic Preservation Act*; the NPS's *Systemwide Archeological Inventory Program* requirements, standards, and priorities; and the NPS *Technical Manual for Archeological Permits*.)

- Park archeological resources are left *in situ* and undisturbed, unless removal of artifacts or intervention into cultural material is justified in the planning process by preservation treatment, protection, research, interpretation, or development requirements. They are preserved in a stable condition to prevent degradation and loss of research values or *in situ* exhibit potential.

- Park archeological resources are inventoried through systematic surveys and evaluated using the National Register criteria. Resources are placed within historical contexts using the *National Park Service's Thematic Framework* (1996); complementary state, regional, and park contexts; and relevant preservation plans. Resource contexts are correlated with NPS objectives for management, interpretation, and regional planning.

- Information about a park's archeological resources is compiled and maintained in the archeological component of the Cultural Sites Inventory (CSI). Required data are entered into the archeological sites management information database. When appropriate, archeological resources information is referenced in the List of Classified Structures, the Cultural Landscapes Inventory, the Cultural Resources Management Bibliography, the National Maritime Initiative Inventory, geographic information systems, and other databases.

- A park's eligible archeological resources are nominated for listing in the National Register of Historic Places. Site information is provided to the state historic preservation officer (SHPO), state archeologist, state underwater archeologist, and state archeological clearinghouse official. Information on the location, character, or ownership of archeological resources whose public disclosure would risk harm to the resources is kept confidential.

- A park's general management plan, development concept plan(s), environmental impact statements, environmental assessments, and other planning documents describe the effects of proposed development, park operations, natural processes, and human activities on archeological resources. They also include explanations in support of decisions to preserve, stabilize, recover, avoid, destroy, monitor, and otherwise treat threatened resources.

- An archeological overview and assessment covering the park is completed. The park's resources management plan includes project statements for other archeological studies and site-specific action plans needed to identify, evaluate, document, nominate, monitor, study, interpret, preserve, stabilize, recover, protect, and otherwise treat archeological resources. These studies and plans are programmed and undertaken in priority order.

- The effects of natural processes and human activities on archeological resources are assessed and documented. A schedule to monitor the condition of affected resources is established and implemented

- Significant archeological and other scientific data threatened with loss from the effects of natural processes, human activities, preservation treatments, park operations, and development activities are recovered, recorded, or otherwise preserved.

- Adequate information about archeological resources is gathered, compiled, and analyzed before initiating or revising park planning documents. When additional information is needed, the required archeological studies are programmed, funded, and executed at least two years before the planning project is scheduled to begin.

- Archeologists review and assess all proposed undertakings that could affect archeological resources to ensure that all feasible measures are taken to avoid resources, minimize damage to them, or recover data that otherwise would be lost. Assessments are documented in environmental impact statements, environmental assessments, general management plans, development concept plans, archeological clearance forms, and other planning and compliance documentation.

- Park development, park operations, preservation treatments, and other actions affecting archeological resources are initiated only upon completion of all required consultation and legal compliance requirements and only when supported by approved proposals, task directives, plans, or reports.

- Archeological reports, studies, and other documentation meet planning and management needs and conform to NPS and professional standards before projects are certified as completed.

- Interpretation of archeological resources is accurate, current, relevant to park themes, and consistent with resource preservation needs.

- Archeologists who conduct research on park lands, whether employed by the government or working under contract or permit, meet the professional qualification standards in Appendix E of this guideline. Contracts for archeological research contain personnel qualification information and other data required for permits under the Archaeological Resources Protection Act and/or the Antiquities Act.

- The full sequence of necessary activities is planned, programmed, and undertaken in archeological research studies. (This generally includes consulting and coordinating activities with NPS and non-NPS parties; preparing work plans or research designs; undertaking needed background research and related activities; conducting the research; recording and analyzing data; preparing interim and final archeological reports; updating base maps; entering data into Service-wide inventories, lists, catalogs, and databases; cataloging, stabilizing, and preparing any collections for storage; preparing National Register nominations for eligible resources; and making research results available to park managers, planners, interpreters, other NPS specialists, the professional community, and the public.)

- The full range of anticipated in-house and other expenses are included in cost estimates and are programmed for archeological research. (This generally includes expenses relating to personnel [e.g., NPS employees, contractors, consultants, peer reviewers]; travel and per diem; equipment purchases and leases, maintenance, and repair; supplies and materials; special data acquisition [e.g., purchase of existing remote-sensed or digitized data]; special studies [e.g., pollen analysis, radiocarbon dating, artifact stabilization]; office, laboratory, and storage space; publication costs [e.g., scientific reports and books, non-technical books, and pamphlets]; attendance at professional meetings; public outreach activities; and overhead costs.)

- Requests to search for or acquire treasure-trove conform to the provisions of "Policies and Procedures for Handling Requests to Search for Treasure Trove" (Special Directive 90-1).

B. Research

Archeological research in the parks is done to support management, protection, understanding, and interpretation of archeological resources. Archeological research typically involves defining theoretical orientation and methodological approaches, identifying and evaluating resources, describing field work, analyzing and synthesizing data recovered, professionally reporting and interpreting results, and conserving data, associated records, and materials. Research may employ nondestructive and destructive methods and may include field surveys, data recovery, and interdisciplinary studies like archival research, geomorphological studies, palynological studies, oral histories, ethnohistories, and analysis of extant collections. Research is conducted by qualified individuals from the NPS, other government agencies, contractors, educational and scientific institutions, and other organizations.

1. Project Development

a. Work Plans and Research Designs

A work plan (sometimes called a scope of work) will be prepared for all archeological research whether conducted by NPS staff or under a contract, permit, or interagency or cooperative agreement. The work plan will set forth the scope, objectives, methods, schedule, and budget for the proposed project. It must be sufficiently detailed to allow for technical and administrative review by cultural resource specialists.

The work plan may be replaced by a more detailed research design, which will describe and assess prior research, state the purpose and goals of the research, present research questions to be addressed, explain strategies and methods of data acquisition, state the disposition of recovered materials and associated records, indicate the nature and delivery dates of expected reports, and contain a project schedule, level of effort statement, and budget. The detail in a research design should be proportionate to the scope of the project.

In general, a work plan is prepared for small, brief archeological clearances related to development or park operations, while a more detailed research design is prepared for larger, multi-year archeological studies. In any case, final reports for all archeological studies should include a discussion of the project's work plan or research design.

b. Permit Requirements

Any research proposal that has the potential to affect archeological resources must be reviewed by an NPS archeologist. If required, the researcher must apply for archeological and/or special use permits, and needed consultations must be undertaken. Non-government researchers must apply for a permit before conducting any research that may affect park archeological resources. Applications for Archaeological Resources Protection Act (ARPA) and/or Antiquities Act permits will be processed in accordance with the requirements of 43 CFR Part 7, *Protection of Archaeological Resources*; 43 CFR Part 3, *Preservation of American Antiquities*; and the NPS *Technical Manual for Archeological Permits*. Applications for special use permits will be processed in accordance with the requirements of the *Special Park Uses Guideline* (NPS-53). Other park-specific special use permits may be required. Special use permits cannot be used in lieu of ARPA and/or Antiquities Act permits.

Archeological research conducted by NPS staff, contractors, or parties under an interagency or cooperative agreement must be reviewed by an NPS archeologist and meet ARPA and/or Antiquities Act permit requirements. Documentation showing that the permit requirements are met is contained in the work plan, research design, contract, or interagency or cooperative agreement. Any terms and conditions also are stipulated. The work plan, research design, contract, or interagency or cooperative agreement constitutes the permit in lieu of a separate ARPA and/or Antiquities Act permit.

c. Consultation Requirements

The NPS will consult with appropriate SHPOs and the Advisory Council on Historic Preservation, in accordance with the terms of the Servicewide Programmatic Agreement or any project-specific memorandum of agreement, in advance of any undertaking that may affect archeological resources. (For further information see Chapter 5 of this guideline.)

Research that may affect sites of religious or other cultural importance to an Indian tribe or other Native American group must also be preceded by notification of and consultation with that group. Notification and consultation will conform to NPS ethnographic program policies and meet the requirements of ARPA; 43 CFR Part 7, *Protection of Archaeological Resources*; the Native American Graves Protection and Repatriation Act (NAGPRA); and 43 CFR Part 10, *NAGPRA Regulations*. NPS archeologists, in coordination with NPS ethnographers, curators, and park superintendents, are responsible for ensuring that archeological research on park lands is in compliance with these policies and requirements.

The consultation process requires close cooperation and coordination among park superintendents and NPS archeologists, ethnographers, and curators to ensure that the NPS speaks with a single voice to culturally affiliated groups. Agreements reached in the consultation process are documented in writing. This is particularly important where there is potential to encounter Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony during the archeological research. It is recommended that agreements also address the treatment and disposition of inadvertent discoveries of Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony. (For further information see Chapter 10 of this guideline.)

2. Identification and Evaluation

a. Systemwide Archeological Inventory Program

The systemwide archeological inventory program is a long-term, systematic research effort to locate, evaluate, and document archeological resources in national park system areas. It seeks to determine the nature and extent of archeological resources in park areas; to record and evaluate them and nominate those eligible to the National Register; and to recommend appropriate strategies for conserving, protecting, preserving *in situ*, managing, and interpreting those resources.

In addition to setting minimum requirements, standards, and priorities applicable to all NPS regions, the program is tailored to each park cluster through development and implementation of a cluster-wide archeological inventory plan. Each cluster documents its progress in meeting targeted goals in annual reports. The program augments existing archeological policies, guidelines, and standards. (For further information see the *National Park Service's Systemwide Archeological Inventory Program* publication.)

b. Cluster-wide Archeological Inventory Plan

Cluster-wide archeological inventory plans describe and assess the status of archeological inventories in the cluster's parks and establish long-term strategies and priorities for conducting archeological inventories. Each cluster's plan identifies and describes the cluster's parks; provides an overview of the area's prehistory, history, and status of archeological research; discusses the nature and extent of prior archeological activities in the parks; establishes cluster-wide strategies to locate, identify, evaluate, and document archeological resources; describes the proposed archeological inventory projects; lists the proposed projects in priority order; and provides cost estimates for each project.

c. Archeological Overview and Assessment

An archeological overview and assessment is the basic element of a park's archeological resources management program. It is an archeological research report produced for a park and the first step in determining the requirements for additional archeological research. Based on a thorough examination of existing records, documents, and reports, the overview and assessment describes and evaluates the known and potential archeological resources in an area and identifies the need for additional field surveys to locate, evaluate, and document resources.

The overview and assessment describes the area's environment and culture history; lists, describes, and evaluates its known archeological resources; describes the potential for as-yet-unidentified archeological resources; describes and evaluates past research in the area or region; outlines relevant research topics; and provides recommendations for future research. It lists the location of collections of archeological materials and associated records related to park resources and contains a comprehensive bibliography. Upon completion of the overview and assessment, the park's base map should be updated to show the locations of sites. Maps should show all areas within the park that have been surveyed for archeological resources and indicate the levels of surveys used.

Each park will have an archeological overview and assessment, which will be programmed and prepared as soon as possible after the park is established. If it is not completed before preparation of the park's resources management plan, it will be scheduled as a priority project in the cultural resources component of that plan. Whenever possible, the overview and assessment will be completed before initiating the park's general management plan, development concept plan(s), land protection plan, and interpretive prospectus. If it is not completed by that time, it must be programmed as a component of one of these park planning activities and completed before approval of the plan. If the overview and assessment indicates that information is inadequate for management of the park's archeological resources, archeological identification and evaluation studies will be designed, programmed, and conducted. The overview and assessment should be reviewed periodically and updated as necessary.

d. Archeological Identification Study

An archeological identification study locates archeological resources and describes their characteristics, potential scientific value, and threats to their integrity and condition. It may cover all or part of a park and may address all or some resource types. It also may cover all or part of several parks, especially parks that are close to one another or share the same culture history. Identification studies will be completed for all parks that lack them or for which prior studies are inadequate.

Each identification study is designed to meet the specific needs of a park. Reconnaissance-level surveys will collect sufficient data on archeological resources to describe their distribution and general characteristics and estimate their scientific values. Intensive-level surveys will collect and analyze sufficient data so that the location, characteristics, scientific values, and condition of archeological resources and threats to them can be determined.

The results of reconnaissance-level surveys, in conjunction with the archeological overview and assessment, usually are sufficient to support preparation of a general management plan. Study at the intensive level is required before initiating a development concept plan and designing approved construction projects. Depending on the nature of a proposed development, it may be necessary to conduct more intensive archeological identification studies in areas previously surveyed at a less intensive, reconnaissance level. An archeological evaluation study (see below) may also be required to ensure that an adequate information base is available *before* development planning or construction design is initiated.

Where required, identification studies will be prescribed in each cluster-wide archeological inventory plan and in each park's archeological overview and assessment, general management plan, and resources management plan. Identification study reports will meet NPS and professional standards. Upon completion of identification studies, the park's archeological overview and assessment and base map will be updated.

e. Archeological Evaluation Study

Tailored to meet a park's specific needs, an archeological evaluation study assesses and documents the scientific value, integrity, condition, and National Register—eligibility of archeological resources and threats to them. Such studies must also precede planning for all proposed development projects, including projects not originally envisioned in a park's general management plan or development concept plan.

Surface collection and subsurface testing should be undertaken only to the extent needed to determine research potential for National Register eligibility or for other specified management purposes. A written evaluation report meeting NPS and professional standards will be produced. Because the evaluation study is closely linked to the identification study, it is often economical to combine them.

Needed evaluation studies will be prescribed in each cluster-wide archeological inventory plan and in the park's archeological overview and assessment, archeological identification study, general management plan, resources management plan, and other planning documents.

3. Archeological Databases

Information about archeological resources, associated data, and studies on park lands will be compiled and entered into park, cluster, and Service-wide databases (listed below) for planning and management purposes. When information about resources, associated data, and studies is entered into more than one database, they will be cross-referenced.

Field-generated Records (associated records). Raw data (e.g., forms, logs, photographs, notes, field maps) from archeological research will be kept in an accessible form with any associated artifacts and specimens at the appropriate park, support office, or archeological or preservation center repository. They must be accessioned and cataloged into the park's museum collection along with recovered archeological material. (See Chapter 9 of this guideline and the NPS *Museum Handbook*, Part II, Museum Records, Appendix D (1996), for guidance on accessioning, cataloging, and managing archival materials.)

Cultural Sites Inventory—Archeology (CSI-A). The CSI-A, the archeological component of the Service-wide Cultural Sites Inventory, is a documented inventory of known archeological resources on national park system lands. Documentation consists of paper records, reports, and associated photographic and electronic media relevant to archeological resources. It includes information about resource location, characteristics, description, research potential, significance, threats, and management, protection, and treatment requirements. The Service-wide archeological sites management information database, an element of the CSI-A, includes standardized data elements, required for park management purposes, that will be recorded for known archeological resources. It also sets forth standardized park-wide, cluster-wide, and Service-wide management reports.

Park Base Maps. Maps will be maintained showing all areas within a park that have been surveyed archeologically, the levels of survey employed, and the locations of all archeological resources found. Physiographic provinces, ecological zones, topographic features, and landscapes associated with archeological resources should be noted on base maps (see Chapter 2 of this guideline on historical base maps).

Cultural Landscapes Inventory (CLI). This is a computerized, evaluated inventory of landscapes having historical, ethnographic, or design significance (see Chapter 7 of this guideline). Archeological resources associated with cultural landscapes should be entered into the CLI.

List of Classified Structures (LCS). This is a computerized, evaluated inventory of prehistoric and historic structures (see Chapter 8 of this guideline). Archeological aspects of prehistoric and historic structures should be entered into the LCS.

Cultural Resources Management Bibliography (CRBIB). This is a computerized, multi-disciplinary listing of professional reports, books, articles, and other publications that address park cultural resources. Bibliographic information on final reports, books, articles, and other publications about archeological resources on park lands will be included in the CRBIB.

State-level Registration. Archeological information will be furnished to the SHPO for incorporation into the state's historic preservation planning and inventory programs. Official state site numbers for archeological resources on park lands will be included in CSI-A records and entered into the archeological sites management information database.

National Register of Historic Places. All archeological sites will be evaluated using the National Register criteria and, if they appear eligible, nominated to the Register.

National Catalog of Museum Objects. Archeological object catalog records listed in the Automated National Catalog System will include the official state site numbers.

National Maritime Initiative Inventory. This is an inventory of significant historic floating vessels, shipwrecks, hulks, and other maritime resources. Information about submerged or buried shipwrecks, hulks, and other maritime-related archeological resources in parks will be entered into this inventory.

National Archeological Database (NADB). This is a computerized database containing information about archeological resources. The reports component of NADB contains bibliographic citations of professional reports, books, articles, and other publications about archeological resources. Bibliographic information about final reports, books, articles, and other publications on archeological resources on park lands will be included in NADB.

4. Confidentiality of Information

The Archaeological Resources Protection Act and the National Historic Preservation Act provide authority, under certain circumstances, to withhold from the public information about the location, nature, and ownership of archeological resources. Such information can be withheld to protect the resources from vandalism, looting, and commercial exploitation, guard against invasions of privacy, and protect traditional religious uses of resources. State agencies furnished such information must maintain its confidentiality, as must researchers in the scholarly community and archeologists and compliance specialists doing environmental assessments. (For more detail see National Register Bulletin 29, *Guidelines for Restricting Information about Historic and Prehistoric Resources*.)

Under the Abandoned Shipwreck Act, the public must be given adequate notice of the location of any shipwreck to which title is asserted under Section 6 of the act. This requirement applies to any abandoned shipwreck located within the national park system to which the federal government asserted title under the act, including any shipwreck whose title subsequently was transferred to a state. If disclosure of the exact location of a shipwreck in a park unit would lead to vandalism, pilferage, or other damage, locational information of only a general nature will be given. (For more information see the National Park Service's *Abandoned Shipwreck Act Guidelines* [55 FR 50116, Dec. 4, 1990; 55 FR 51528, Dec. 14, 1990; 56 FR 7875, Feb. 26, 1991].)

5. Archeological Data Recovery Studies

The NPS *Management Policies* provides that "archeological resources will be left undisturbed unless removal of artifacts or intervention into fabric is justified by protection, research, interpretive, or development requirements." Because it is preferable to preserve and protect archeological resources *in situ*, collection of detailed information about the location, characteristics, and scientific values of park archeological resources during archeological identification and evaluation studies is essential. Such data are needed to ensure that archeological resources concerns are addressed properly during the planning, design, and construction of park development projects to minimize the need for archeological data recovery.

If proposed park development will have an effect on archeological resources, *Management Policies* requires that "all reasonable measures to limit adverse effects will be taken, including recovery of data and salvage of materials, as appropriate." Such mitigation, usually stipulated during Section 106 compliance, provides for a data recovery project that involves data collection (excavation, documentation, and surface collection of artifacts), data analysis, report production, and preservation of recovered materials and associated records. Each mitigation project will be designed in consultation with the SHPO. It will recover the full range of significant archeological information that otherwise would be lost and will preserve *in situ* as much of the scientific research potential of the resource as is practicable.

Data recovery usually is called for when archeological resources are threatened with destruction from natural processes (e.g., volcanic eruptions, erosion, floods, wildlife, and subsidence) or by human activities (e.g., looting, vandalism, and oil spills).

6. Disposition of Archeological Collections

Archeological studies that include surface collection, subsurface testing, or other excavations result in the collection of archeological objects and specimens. These materials and associated records will be treated in accordance with NPS museum management program requirements and 36 CFR 79, *Curation of Federally Owned and Administered Archeological Collections*. Archeological projects that include the recovery of archeological material will provide for cataloging objects, specimens, and associated records into the NPS's National Catalog of Museum Objects, and for cleaning, stabilizing, and preparing collections for storage. (See Chapter 9 of this guideline for details on NPS museum management program requirements and Chapter 10 for information on special concerns relating to collections that contain Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony.)

C. Planning

1. Relationship to Park Planning Documents

Park management, operations, and development require production of a variety of planning documents. Projects and alternatives proposed in these documents frequently will have direct or indirect effects on archeological resources, requiring changes in the ways the resources are managed, preserved, or treated. Accordingly, archeologists should be included as team members or consultants during preparation of park planning documents. At a minimum, consultation with an archeologist is required at the earliest practicable stage for all planning documents and proposed projects, preferably during the scoping process.

a. General Management Plan

As part of the decision-making process leading to preparation (or revision) of a GMP, the park's archeological resources information base will be evaluated by an archeologist for adequacy, quality, and usefulness. Depending on the scope of the planning effort, it may be necessary to program and collect baseline information about the park's archeological resources. If the archeological overview and assessment indicates information is inadequate, archeological identification and evaluation studies may be needed at this time. For GMP planning that will address development or construction requirements, archeological surveys must be conducted in advance to provide information necessary to assess potential impacts to resources.

b. Resources Management Plan

Parks are required to have an archeological overview and assessment. If it does not exist or if it needs updating, a project statement for its completion should be included in the RMP. In addition, each park must inventory and evaluate, in consultation with the SHPO, its archeological resources. Each park should assess the overall adequacy of its archeological resources information base and include in its RMP proposals for inventory and evaluation studies to correct deficiencies. This normally involves programming for archeological identification and evaluation studies and preparation and submission of National Register nominations for eligible archeological resources. RMPs also should contain project statements for preservation and protection treatments needed at specific archeological sites or groups of sites. Such treatments generally would be called for at sites that have suffered from or are likely to be threatened by the destructive effects of natural processes or human activities not under the direct control of the NPS. Examples include programming for periodic monitoring and condition assessment, stabilization, and data recovery. In addition, RMPs identify park-based staff and fiscal resources needed to carry out the park's archeological resource management responsibilities.

c. Development Concept Plan

Development concept plans will be preceded by systematic archeological identification and evaluation studies to locate and evaluate all archeological resources in areas that could be affected directly or indirectly by planned construction and human activity. The studies should provide sufficient information to predict probable effects, plan for alternatives, and design any data recovery projects. It is important that these studies be accomplished early enough in the planning process to weigh findings in the selection of the final design and the location of facilities.

d. Interpretive Prospectus

Proposals to interpret a park's archeological resources are included in the park's interpretive prospectus. The interpretive prospectus identifies specific interpretive themes and objectives and contains recommendations on appropriate media. If additional archeological research is needed for interpretive purposes, it should be identified in the interpretive prospectus and programmed in the resources management plan. It is important that the results of archeological studies be made available to park interpreters, interpretive planners, and exhibit designers. Details on the need to withhold from the public any specific information about archeological resources should be provided so that confidential information will not be released. (For further information see the *Interpretation and Visitor Services Guideline* [NPS-6].)

e. Other Park Plans

Because fire management, disaster control, law enforcement, visitor use, paleontological research, cave management, agricultural leasing, and other activities may adversely affect archeological resources, other park plans should reflect consideration of these factors. For example, park emergency operations plans, fire plans, crime prevention plans, physical security plans, cave management plans, and the natural resources component of resources management plans should address the protection of archeological resources.

2. Relationship to Other Cultural Resources

Archeological research contributes to improved management, preservation, and treatment of other types of cultural resources in park areas. Conversely, the management, preservation, and treatment of archeological resources is enhanced through research in other cultural resource disciplines. Because of the potential interdisciplinary qualities of most cultural resources, archeologists and other cultural resource specialists will cooperate and collaborate on cultural resources studies (see the definition of "cultural resource specialist" in Appendix A of this guideline for a list of discipline specialists). Basic interdisciplinary relationships between archeological resources and other types of cultural resources are identified below.

a. Museum Collections

More than half of the 25 million objects in NPS museum collections are archeological in nature. Archeologists recover, document, analyze, stabilize, and prepare archeological collections for storage as integral elements of archeological research. They also analyze or reanalyze extant archeological collections. Archeologists, curators, archivists, and conservators consult on treatments for and consumptive uses of specific archeological objects, specimens, and records. Archeologists, curators, and ethnographers consult about the cultural affiliations of contemporary American Indian tribes, Native Alaskan groups, and Native Hawaiian organizations to materials in NPS museum collections. They also consult on culturally appropriate treatments for collections, the display of collections, and repatriation of items under the Native American Graves Protection and Repatriation Act. Archeologists, curators, and exhibit planners and designers consult on the display of archeological objects in museum exhibits.

b. Historic and Prehistoric Sites and Structures

Archeologists and historical architects consult and share expertise in preparing planning documents, analyzing building materials and structural fill, making condition assessments, and providing recommendations on routine maintenance and needed stabilization or other preservation treatments. Archeological studies address research questions historians and historical architects may have about the location, construction methods, developmental history, age, and use of historic and prehistoric sites and structures for which only ruins or subsurface remains now exist. Archeological studies must precede work on prehistoric or historic structures requiring ground disturbance. Archeological studies also must precede stabilization and other preservation treatments that will alter the building fabric of prehistoric structures. Such studies will ensure that important archeological data that otherwise would be lost or destroyed by ground disturbance, stabilization, or the preservation treatment is recovered and documented. The results of archeological studies relating to historic and prehistoric sites and structures are included in historic structure reports and historic resource studies and are recorded on the park's base map. Archeological information, condition assessments, and recommendations on maintenance, site stabilization and other preservation treatments are incorporated into the Inventory and Condition Assessment Program.

c. Cultural Landscapes

Archeologists help identify and document cultural landscapes through an analysis of stratigraphy, soils, fossil pollen, and buried features. The results of archeological studies also can help identify past land uses of an area. Historical landscape architects and landscape historians can provide information on past landforms, patterns, physical relationships, and features to archeologists. Mutual review of research proposals and other plans having the potential to affect both resource types will be undertaken.

d. Ethnographic Resources

Ethnographic studies can provide data on cultural affiliation of contemporary Native American and ethnic groups to prehistoric and historic archeological resources on park lands. They also can provide data on the cultural significance of those resources to such groups. Ethnographic studies make it possible to ensure that culturally affiliated groups are consulted about archeological research and permitting activities, management approaches for culturally sensitive archeological resources, and treatments and disposition of culturally sensitive materials in archeological collections. Archeological studies and analyses of archeological collections can provide data on the cultural affiliation of contemporary Native American and ethnic groups to prehistoric and historic archeological resources, human remains, and objects in collections.

3. Use of Archeological Resources

Archeological resources on park lands may be used for scientific research and for appropriate public interpretation and enjoyment.

a. Research Uses

NPS researchers are encouraged to seek cooperative relationships with recognized educational and scientific institutions and qualified individuals whose archeological research programs or interests will complement park management objectives. NPS facilities and assistance can be made available to qualified scholars conducting NPS-authorized research, provided that park operations and park resources are not impaired. Archeological research unrelated to park management objectives may be authorized when there is compelling evidence that the proposal is essential to significant research goals and can be reasonably achieved only by studying sites on park lands. (For information on permit requirements, see section B.1.b. of this chapter.)

Non-destructive research methods will be employed whenever practicable and feasible to preserve archeological resources *in situ* with minimal disturbance. Subsurface testing, surface collection of artifacts, and other destructive techniques should be used only when necessary to achieve research objectives or meet management requirements. When used, the scope of such destructive research activities should be kept to a minimum.

Destructive analysis of objects and materials (e.g., artifacts, soil matrix, pollen, charcoal, shell, bone, wood, and structural material) recovered from archeological resources is sometimes allowable as in chemical and physical tests to reveal their composition, age, or source. When destruction is minor or when objects to be destroyed are common, approval may be given at the park level. Destructive analysis of rare or significant archeological objects or materials must be preceded by scientific proposals and research designs reviewed by archeologists and curators in support offices or centers and approved in writing by regional directors. (For further information on consumptive use of archeological collections, see Chapter 9 of this guideline.)

b. Interpretive Uses

Archeological studies provide information and objects important to the park interpretive program. Park interpreters will be briefed about ongoing archeological studies so that they will be able to inform and respond to questions from park visitors about the research. Interpretive planning documents will be prepared for presenting this information in exhibits, publications, and other media. Programs for interpreting a park's archeological resources will be prepared by interpreters, archeologists, and other knowledgeable parties. Any alteration of an archeological resource to accommodate related security, safety, law enforcement, and disabled access interests must be preceded by planning, Section 106 review and compliance, and appropriate resource treatment.

4. Section 106 and NEPA Compliance

Chapter 5 of this guideline contains general procedures for compliance with Section 106 of the National Historic Preservation Act in project planning. The *NEPA Compliance Guideline* (NPS-12) contains general procedures for compliance with the National Environmental Policy Act (NEPA). With respect to archeological resources, at the earliest possible stage of planning it must be determined (1) whether and at what level the proposed project area has been surveyed archeologically, (2) whether archeological resources eligible for the National Register have been identified in the area, and (3) whether such resources

will be affected by the proposed project. The potential of an undertaking to affect archeological resources will be assessed by applying the Advisory Council on Historic Preservation's criteria of effect.

Whenever possible, undertakings should be designed to avoid impacting archeological resources. Archeological clearances, archeological reports, environmental assessments, environmental impact statements, development concept plans, and other documents will be prepared, as needed, to record the steps taken and alternatives considered to avoid impacting archeological resources. Some SHPOs allow simplified archeological clearance documentation for actions that will have no effect on resources. When avoidance is not possible or feasible, the unavoidable adverse effects must be mitigated through measures such as data recovery. Any required data recovery project will be designed in consultation with the SHPO and will conform to NPS and professional standards.

5. Funding and Staffing

Parks, support offices, and archeological and preservation centers should systematically evaluate their funding and staffing (FTE) requirements for archeological resource management, treatment, and protection purposes. Unmet funding and FTE needs should be identified and justified in park resources management plans, in cluster-wide archeological inventory plans, and in budget documents. All archeological research (including compliance-related projects) will include adequate funding for conducting the needed studies; analyzing recovered data; preparing final reports; cataloging, stabilizing, and preparing archeological collections for storage; preparing National Register nominations for eligible resources; making the results available to park managers, planners, interpreters, and other NPS specialists; and making the results available to the professional community and to the public.

D. Stewardship

Stewardship of archeological resources is wide-ranging. It includes their treatment, preservation, and protection. It includes monitoring resource condition and assessing threats and disturbances. It also includes staff involvement and training in protection concerns and methods, preservation of significant features, sites, and recovered materials, and interpretation of archeological resources for public benefit.

1. Treatment

Archeological resources will be left undisturbed unless intervention can be justified based on compelling research, interpretation, site protection, or park development needs. Recovered archeological materials and associated records will be treated in accordance with the NPS *Management Policies*, NPS *Museum Handbook*, and 36 CFR Part 79. Archeological collections will be cataloged, stabilized, and prepared for storage as part of the study or project that generated the material.

a. Preservation

Guidance for preserving historic and prehistoric structures is presented in Chapter 8 of this guideline, and that for museum objects is found in Chapter 9. More specific guidance for preserving archeological resources, including prehistoric structures, can be found in sources listed in Appendix J, the selected archeology bibliography. Guidance applicable to all types of archeological resources is summarized here:

1. All resources will be protected against natural and human agents of destruction and deterioration whenever practicable.
2. Preservation will maintain the existing form, integrity, and materials of the resource.
3. Preservation will include techniques of arresting or retarding deterioration through a program of ongoing maintenance. Deteriorated areas (e.g., depressions created through erosion, slumping, subsidence, and other natural causes) will be backfilled or otherwise stabilized.
4. Excavation and other destructive techniques will be employed only when necessary to provide sufficient information for research, interpretation, and management needs. Excavated areas (including potholes excavated by looters) will be backfilled or otherwise stabilized.
5. Stabilization of a resource to arrest and inhibit deterioration will be done in such a way as to detract as little as possible from its appearance and significance and not adversely affect its research potential unless adequate data recovery has occurred. Stabilization by vegetation, installation of

riprap or landscape netting, burial, or other alteration will be undertaken only after sufficient research or experimentation to determine the probable efficacy of the action and only after existing conditions are fully documented. A complete record of stabilization work will be kept.

6. Data recovery will precede and be completed before physical intervention into any archeological resource, including sites associated with historic structures.

b. Rehabilitation, Restoration, and Reconstruction

Archeological sites and structures will not be rehabilitated, restored, or reconstructed.

2. Protection

Archeological resources will be protected from vandalism and looting. Patrols, fencing, warning signs, and remote-sensing alarms will be used as appropriate. Stewardship programs wherein concerned local people are enlisted to monitor conditions of archeological resources are encouraged.

Interpretive and public educational programs to promote site protection are encouraged. The public should be made aware of the value of archeological resources and the penalties for destroying them through posters, films, and other media. Park staff should be made aware of protection concerns and methods through training sessions.

CHECKLIST FOR MANAGEMENT OF ARCHEOLOGICAL RESOURCES

RESEARCH:

- Sufficient research is conducted to identify and evaluate park archeological resources and to assess their condition and threats to them.
- Recovered archeological materials are cleaned, conserved, studied, cataloged, and properly stored. Associated records documenting resources are maintained as a part of the archeological collection.
- Information about archeological resources is compiled and maintained in the archeological component of the Cultural Sites Inventory. Paper and electronic records are maintained nationally and at parks, support offices, and centers.
- Eligible archeological resources are nominated for listing in the National Register of Historic Places.
- Park base maps are prepared showing the location and distribution of archeological resources and the nature and extent of archeological identification activities.
- Research results are disseminated to park managers, planners, interpreters, and other NPS specialists and incorporated into appropriate park planning documents.

PLANNING:

- Planning for actions that might affect archeological resources is preceded by research sufficient to identify and evaluate such resources.
- Planning decisions promote the preservation of archeological resources in place.
- Planning decisions that result in adverse effects on archeological resources are made only after a thorough analysis of impacts, when there are no feasible alternatives, and when all reasonable measures to limit the adverse effects are taken.
- Required consultation and legal compliance is carried out, and the concerns raised during consultations are taken into account in decision-making.

STEWARDSHIP:

- Archeological resources are preserved and protected by eliminating and avoiding natural and human impacts, stabilizing sites and structures, monitoring conditions, and enforcing protective laws and regulations.
- Information about archeological resources is included, as appropriate, in interpretive and educational programs designed for the public.

CHAPTER 7: MANAGEMENT OF CULTURAL LANDSCAPES

A. Introduction and Objectives

1. Introduction

Cultural landscapes are complex resources that range from large rural tracts covering several thousand acres to formal gardens of less than an acre. Natural features such as landforms, soils, and vegetation are not only part of the cultural landscape, they provide the framework within which it evolves. In the broadest sense, a cultural landscape is a reflection of human adaptation and use of natural resources and is often expressed in the way land is organized and divided, patterns of settlement, land use, systems of circulation, and the types of structures that are built. The character of a cultural landscape is defined both by physical materials, such as roads, buildings, walls, and vegetation, and by use reflecting cultural values and traditions.

Identifying the significant characteristics and features in a landscape and understanding them in relation to each other and to significant historic events, trends, and persons allows us to read the landscape as a cultural resource. In many cases, these features are dynamic and change over time. In many cases, too, historical significance may be ascribed to more than one period in a landscape's physical and cultural evolution.

Cultural landscape management involves identifying the type and degree of change that can occur while maintaining the historic character of the landscape. The identification and management of an appropriate level of change in a cultural landscape is closely related to its significance. In a landscape significant for its association with a specific style, individual, trend, or event, change may diminish its integrity and needs to be carefully monitored and controlled. In a landscape significant for the pattern of use that has evolved, physical change may be essential to the continuation of the use. In the latter case, the focus should be on perpetuating the use while maintaining the general character and feeling of the historic period(s), rather than on preserving a specific appearance.

2. Program Objectives

According to federal law and the NPS *Management Policies*, all cultural landscapes are to be managed as cultural resources, regardless of the type or level of significance. Cultural landscape management focuses on preserving a landscape's physical attributes, biotic systems, and use when that use contributes to its historical significance. Research, planning, and stewardship are the framework for the program. Research defines the features, values, and associations that make a landscape historically significant; planning outlines the issues and alternatives for long-term preservation; and stewardship involves such activities as condition assessment, maintenance, and training.

3. Cultural Landscape Categories

A cultural landscape is a geographic area, including both natural and cultural resources, associated with a historic event, activity, or person. The National Park Service recognizes four cultural landscape categories: *historic designed landscapes*, *historic vernacular landscapes*, *historic sites*, and *ethnographic landscapes*. These categories are helpful in distinguishing the values that make landscapes cultural resources and in determining how they should be treated, managed, and interpreted.

Historic designed landscapes are deliberate artistic creations reflecting recognized styles, such as the twelve-acre Meridian Hill Park in Washington, D.C., with its French and Italian Renaissance garden features. Designed landscapes also include those associated with important persons, trends, or events in the history of landscape architecture, such as Frederick Law Olmsted National Historic Site and the Blue Ridge Parkway.

Historic vernacular landscapes illustrate peoples' values and attitudes toward the land and reflect patterns of settlement, use, and development over time. Vernacular landscapes are found in large rural areas and small suburban and urban districts. Agricultural areas, fishing villages, mining districts, and homesteads are examples. The 17,400-acre rural landscape of Ebey's Landing National Historical Reserve represents a continuum of land use spanning more than a century. It has been continually reshaped by its inhabitants, yet the historic mix of farm, forest, village, and shoreline remains.

Historic sites are significant for their associations with important events, activities, and persons. Battlefields and presidential homes are prominent examples. At these areas, existing features and conditions are defined and interpreted primarily in terms of what happened there at particular times in the past.

Ethnographic landscapes are associated with contemporary groups and typically are used or valued in traditional ways. In the expansive Alaska parks, Native Alaskans hunt, fish, trap, and gather and imbue features with spiritual meanings. Jean Lafitte National Historical Park and Preserve illustrates the strong interrelationship between the dynamic natural system of the Delta region and several cultural groups through many generations. Numerous cultural centers maintain ties to distinctive, long-established groups with ethnic identities.

The four cultural landscape categories are not mutually exclusive. A landscape may be associated with a significant event, include designed or vernacular characteristics, and be significant to a specific cultural group. For example, Gettysburg National Military Park is a historic site primarily significant as the scene of the 1863 Civil War battle. The park also includes historic vernacular farm complexes that existed at the time of the battle and a number of designed components added later to commemorate the event, including a national cemetery, roads, and numerous monuments.

The cultural landscape program focuses on landscapes listed in or eligible for the National Register of Historic Places. Landscapes primarily significant for their ethnographic value are under the purview of the ethnography program; however, professionals from both programs may be involved in their documentation and treatment. (See Chapter 10 for guidance in managing ethnographic landscapes.)

B. Research

The primary purpose of research on cultural landscapes is to define the values and associations that make them historically significant. Research findings provide information for management decisions and actions extending from the development of long-term plans to compliance with preservation law and maintenance, assist in determining appropriate treatment, and support interpretive programs. The following standards apply:

- Research on a cultural landscape involving other resource types (archeological resources, structures, museum objects, ethnographic resources, natural resources) is conducted in consultation with specialists in their related disciplines, whose expertise is reflected in the reported findings and recommendations.
- Deficiencies in research on, and evaluation and registration of, a cultural landscape are identified in the park resources management plan and corrected as soon as possible.

1. Identification

Section 110 of the National Historic Preservation Act requires the NPS to identify and nominate to the National Register all resources under its jurisdiction that appear eligible, including cultural landscapes. Historical areas of the national park system are automatically listed in the National Register upon their establishment by law or executive order, but landscape resources within them that contribute to their historical significance still must be documented for the Register.

Research and preliminary field surveys are conducted to determine the existence of cultural landscapes. Identifying the significant characteristics and features of a landscape involves understanding its physical modifications and use, along with any ethnographic values and affiliations.

Except for ethnographic landscapes, the initial identification of cultural landscapes occurs in historic resource studies. An HRS must contain enough information about the developmental history, evolution, and existing conditions of a cultural landscape to evaluate its integrity and define appropriate National Register boundaries. Based on the research and field investigations conducted, a historical base map clearly depicting all cultural landscape resources and a National Register nomination are prepared. Addenda to existing HRSs are appropriate to address cultural landscapes that were not addressed initially.

2. Documentation, Evaluation, and Registration

a. Documentation

Documentation of cultural landscapes requires the use of primary and secondary sources; review and assessment of archeological records; and intensive field investigations to determine the extent and condition of historic and contemporary landscape features. Maps, plans, drawings, and photographs should be prepared as part of the baseline documentation.

b. Significance

Significance is determined by relating a landscape's history and existing characteristics and features to its historic context. The features, materials, patterns, and relationships that contribute to its historical significance must be present and have integrity. There may be more than a single area or period of historical significance for the landscape as a whole or for individual parts of it.

c. Integrity

The integrity of a cultural landscape is judged by the degree to which the characteristics that define its historical significance are present. Because important aspects such as vegetation and use change over time, integrity also depends on how evident the general character of the historic period is and the degree to which incompatible elements are reversible. With some vernacular and ethnographic landscapes, change itself is a significant factor and must be considered in assessing their integrity. In a designed landscape, a specific feature or area may survive in better condition than other equally important features or areas. In this case, an assessment of integrity should focus on the role of the individual feature in the overall historic design and the degree to which it contributes to the integrity of the design. In a similar way, as vegetation matures, the change in tree canopy, scale, and massing may affect the overall character of the landscape. It is important to consider how such changes affect the landscape as a whole and the degree to which they impact or obscure it.

d. National Register Nominations

Cultural landscapes are listed in the National Register when their significant cultural values have been documented and evaluated within appropriate thematic contexts and physical investigation determines that they retain integrity. Cultural landscapes are classified in the National Register as sites or districts or may be included as contributing elements of larger districts.

e. Cultural Landscapes Inventory

The Cultural Landscapes Inventory (CLI) is a computerized, evaluated inventory of all cultural landscapes in which the NPS has or plans to acquire any legal interest. Its purpose is to identify cultural landscapes in the national park system and provide information on their location, historical development, character-defining features, and management. The CLI assists park managers in planning, programming, and recording treatment and management decisions. CLI forms, including maps, drawings, and photographs, are maintained in the support offices and parks.

For more information on documentation, evaluation, and registration see National Register Bulletins 18, 30, 38, 40, 41, and 42 and the *Cultural Landscapes Inventory Professional Procedures Guide*.

3. Cultural Landscape Report

A cultural landscape report (CLR) is the primary guide to treatment and use of a cultural landscape. Based on the historic context provided in a historic resource study, a CLR documents the characteristics, features, materials, and qualities that make a landscape eligible for the National Register. It analyzes the landscape's development and evolution, modifications, materials, construction techniques, geographical context, and use in all periods, including those deemed not significant. Based on the analysis, it evaluates the significance of individual landscape characteristics and features in the context of the landscape as a whole. Typically interdisciplinary in character, it includes documentation, analysis, and evaluation of historical, architectural, archeological, ethnographic, horticultural, landscape architectural, engineering, and ecological data as appropriate. It makes recommendations for treatment consistent with the landscape's significance, condition, and planned use.

A CLR's scope and level of investigation will vary depending on management objectives. It may focus on an entire landscape or on individual features within it. Before any decision regarding treatment of a landscape, *Part 1: Site History, Existing Conditions, Analysis, and Evaluation* must be completed.

A CLR includes the following:

Introduction contains the management summary, historical overview and context, study boundaries, methodology and scope of the project, and a summary of findings.

Part 1: Site History, Existing Conditions, Analysis, and Evaluation contains three primary sections:

- *Site History* includes a narrative history of the landscape describing, as appropriate, the historic context, design intent, primary design principles, key developments, physical relationships, patterns, features, and important individuals or events; and a historical base map/period plan for each significant historic period.
- *Existing Conditions* includes a definition of site boundaries, an accurate site map, and a brief description of current resources, primary features, access, and site use.
- *Analysis and Evaluation* includes an inventory and documentation of significant characteristics and features based on National Register criteria, a condition assessment of those features, and related site information.

Part 2: Treatment contains recommendations for treatment of the landscape based on the site history, existing conditions, and analysis; enabling legislation; applicable standards; and the proposed use as defined in planning documents. Recommendations are presented in a treatment plan and/or narrative guidelines. Cost estimates may be included.

Part 3: Record of Treatment documents the actual treatment with photographs, sketches, accounting data, and narratives outlining the course of work, conditions encountered, and materials used.

Appendices, Bibliography, and Index contain supplemental drawings, illustrations, maps, photographs, technical information, or other support documentation; a list of sources used in preparing the document; and references to material in the document, respectively.

The following standards apply:

- A CLR is prepared to minimize loss of significant characteristics, features, and materials when existing information about the physical history and condition of a cultural landscape is inadequate to address anticipated management objectives, when impending development alternatives could have adverse effects, or to record actual treatment.
- The CLR is prepared by qualified professionals based on appropriate methodologies and techniques for cultural landscape research, documentation, and evaluation.
- Archeological records, base maps, and techniques such as soil analysis are used for data on past features and conditions.

- Landscape, architectural, and archeological investigations supporting a CLR employ nondestructive methods to the maximum extent possible; they are prescribed and justified in a task directive that includes a research design and impact analysis.

MODEL CLR CONTENTS

- *Cover Page*
- *Table of Contents*
- *Introduction.* The introduction includes five sub-sections: (a) a management summary describing the purpose of the project; (b) a historical overview that provides a brief historical context for the landscape; (c) a description of the scope of the project and methodology for completing it; (d) a description of study boundaries; and (e) a summary of findings.

PART 1. SITE HISTORY, EXISTING CONDITIONS, ANALYSIS, AND EVALUATION

Site History. This section provides a historical description of the landscape and all significant characteristics. The text is based on research and historical documentation, with enough support material to illustrate the physical character, attributes, features, and materials that contribute to the significance of the landscape. This section identifies the historical context within which the landscape developed, and the period or periods of significance if this has not been done in the HRS or National Register nomination. *Existing Conditions.* This section contains a description of the landscape as it exists today including the documentation of landscape characteristics such as land use, vegetation, circulation, and structures. It is based on both research and site survey, including on-the-ground observation and recordation of significant features. A condition assessment is completed to determine the age, material, composition, and integrity of significant components.

Analysis and Evaluation. This section compares findings from the site history and existing conditions to identify the significance of individual features in the context of the landscape as a whole. Historical integrity is evaluated to determine if the characteristics and features that defined the landscape during the historic period are present. A statement of significance for the landscape is included, and the analysis and evaluation are summarized in the identification of character areas or the development of management zones.

PART 2. TREATMENT

This section describes the preservation strategy for long-term management of the cultural landscape based on its significance, existing condition, and use. It also includes a discussion of overall management objectives for the site as documented in planning studies or other management documents. The treatment section may address the entire landscape, or a portion, or a specific feature within it. Treatment is described in a narrative text, treatment plan, or design alternatives.

PART 3. RECORD OF TREATMENT

This section summarizes (a) the intent of the work, (b) the way in which the work was approached and accomplished, (c) the time required to do the work, and (d) the cost of the work. This section also contains copies of the field reports, condition assessments, and contract summaries. It is usually included as an appendix or addendum to the CLR.

APPENDIX, BIBLIOGRAPHY, AND INDEX

This section contains supplemental drawings, illustrations, maps, photographs, technical information, or other support documentation; a list of sources used in preparing the document; and references to material in the document, respectively.

- Confidential information on the location, nature, character, or ownership of archeological and ethnographic resources is identified and not made available to the public.

- National Register documentation is prepared or amended to address cultural landscape resources identified in a CLR after its preparation, if appropriate.
- All field notes, primary documents, original maps, drawings, photographs, and plant materials gathered or associated with the research for CLRs or special landscape projects are organized and preserved as archival material or museum objects in consultation with the park or support office curator.
- All information regarding the condition and assessment of character-defining landscape features is incorporated in the Inventory and Condition Assessment Program (ICAP).

C. Planning

1. Relationship to Park Plans

Cultural landscapes should be considered in all special resource studies for establishing new park areas. In existing parks, cultural landscapes often influence proposals in a park's statement for management, general management plan, development concept plan(s), resources management plan, and interpretive prospectus. Cultural landscape issues, such as historic land uses and the location and character of significant resources, should be considered in the development of all planning documents to avoid adverse effects on landscapes. Information in the Cultural Landscapes Inventory is generally adequate for a general management plan. A development concept plan should be coordinated with the preparation of a CLR and/or involve a historical landscape architect to ensure that development maintains the significant character and features of the landscape. The resources management plan should provide a format for documenting research and treatment requirements related to cultural landscapes as part of a comprehensive park cultural resource program. Appropriate siting of wayside exhibits and signs and techniques for cultural landscape interpretation should be addressed in the interpretive prospectus. In all park plans, the planning process itself is a fundamental tool for integrating information about and determining relationships among cultural landscapes and other resource types.

2. Decisions About Treatment

Information about the significance and integrity of cultural landscapes is required before making planning decisions about treatment and in many activities associated with park operations. For general management planning purposes, the historic resource study is the

primary document for determining significance and integrity. Before treatment of a landscape or its individual features, additional information regarding its significance, integrity, and condition is necessary. The CLR is the primary supporting document in this regard.

The following standards apply:

- The Cultural Landscapes Inventory or Part I of a CLR, as appropriate, is completed before any major park planning effort affecting a cultural landscape.
- Proposals for actions affecting a cultural landscape are consistent throughout all park planning documents.
- Development plans affecting a cultural landscape involve consultation among historical landscape architects and other resource specialists to assure appropriate protection of all resources.

3. Compliance

Because many parks were evaluated and documented for the National Register before cultural landscapes were recognized as significant resources, the National Register is an incomplete indicator of the presence of landscape resources. In Section 106 compliance, therefore, particular attention must be given to identifying and evaluating landscapes and their significant characteristics, features, and uses so that the effects of proposed undertakings on them can be adequately considered.

Actions affecting cultural landscapes, and thus requiring Section 106 compliance, fall into two categories:

Actions undertaken specifically for the management of a cultural landscape: The most common activity in this category that may affect the character or use of a cultural landscape is routine grounds maintenance, such as pruning and replacing vegetation, mowing grass, repairing fences, resetting and replacing paving materials in kind, and maintaining roads, paths, and trails. Although the work required to maintain a cultural landscape may not differ significantly from other park maintenance practices, many landscapes require special attention and treatment of various features. This especially is true in designed landscapes where the treatment, use, and maintenance of single features may profoundly affect the integrity of the whole.

Actions undertaken for other management purposes: Actions in this category can have significant adverse effects on a cultural landscape if not planned and carried out with consideration of its values. Examples include the construction of buildings and general work associated with site development; the addition or resurfacing of trails to meet accessibility standards; the addition of contemporary patios, fences, walkways, walls, utilities, and site furniture; and changes in use from open space to parking lot, visitor center, or maintenance yard. Although the impact of a single such action may be minor, the cumulative effect of successive actions may be adverse.

The following standards apply to actions affecting landscape resources:

- A landscape that has not been evaluated for National Register eligibility is given such evaluation before or during Section 106 consideration of an undertaking affecting it.
- Proposed actions are evaluated for their effects on individual landscape features and landscapes as a whole.
- Any ground disturbance in a cultural landscape requiring archeological clearance is reviewed in advance by a historical landscape architect in consultation with an archeologist.

4. Use

Use is an integral characteristic of a cultural landscape and impacts the landscape both materially and spatially. In vernacular and ethnographic landscapes, significant patterns of land use may have varied over several generations, while in a historic designed landscape land use activities may be fixed. Contemporary use of a cultural landscape is appropriate (1) if it does not adversely affect significant landscape features, and (2) if it either follows the historic use or does not impede public appreciation of it.

5. Funding and Staffing

Because the NPS has only recently recognized cultural landscapes as a major resource type, funding and staffing for landscape research, planning, and stewardship are relatively limited. Parks should systematically evaluate their funding and staffing needs for landscapes and identify them in park resources management plans.

D. Stewardship

1. General Treatment

This section contains management standards that provide a broad philosophical base for the treatment of cultural landscapes. Treatment is traditionally divided into four categories: preservation, rehabilitation, restoration, and reconstruction. The standards should be used in evaluating proposed projects and in planning and executing all work.

The following standards apply to all treatments:

- Land use activities, whether historic or introduced, do not impair archeological resources.
- Uses addressing programmatic needs or park facilities within a cultural landscape, such as visitor centers, parking, interpretive structures, housing, administrative facilities, maintenance yards, and storage areas, are carefully considered in the context of the significance of the landscape.

- Use is monitored and regulated to minimize both immediate and long-term damage.
- Contemporary facilities do not adversely impact the landscape's physical and visual character. New facilities are compatible with the historic character and material of the landscape.
- Contemporary structures to facilitate access, such as ramps, railings, signs, and curb cuts, are designed and located to minimize adverse impacts on the character and features of a cultural landscape.
- Access to a cultural landscape that is vulnerable to damage from human use is limited, monitored, or controlled.
- All treatment and use decisions reflect consideration of effects on both the natural and built features of a cultural landscape and the dynamics inherent in natural processes and continued use.
- Use of destructive techniques, such as archeological excavation, is limited to providing sufficient information for research, interpretation, and management needs.
- All work that may affect cultural landscapes is evaluated by a historical landscape architect and other professionals, as appropriate.
- All modification, repair, or replacement of materials and features is preceded by sufficient study and recording to protect research and interpretive values.
- New work, materials, and replacement features are identified, documented, or permanently marked in an unobtrusive manner to distinguish them from original work, materials, and features. The manner and location of identification is recorded using the Inventory and Condition Assessment Program (ICAP).
- A proposed treatment project is initiated by the appropriate programming document, including a scope of work and cost estimate from a CLR or ICAP. Such projects include preservation maintenance as well as major treatment. No treatment is undertaken without an approved CLR or work procedure specifying the work, and Section 106 compliance.
- A treatment project is directed by a historical landscape architect and performed by qualified technicians.
- Representative features salvaged from a cultural landscape are accessioned and cataloged, provided that they fall within the park's scope of collection statement.
- All changes made during treatment are graphically documented with drawings and photographs. Records of treatment are managed as archival materials by a curator or archivist within the park's museum collection.
- Work on historic structures, including modifications to improve drainage and access, does not harm the character-defining features of a cultural landscape.

a. Preservation

Preservation maintains the existing integrity and character of a cultural landscape by arresting or retarding deterioration caused by natural forces and normal use. It includes both maintenance and stabilization. Maintenance is a systematic activity mitigating wear and deterioration of a cultural landscape by protecting its condition. In light of the dynamic qualities of a landscape, maintenance is essential for the long-term preservation of individual features and the integrity of the entire landscape. Stabilization involves reestablishing the stability of an unsafe, damaged, or deteriorated cultural landscape while maintaining its existing character. The following standards based on the *Secretary of the Interior's Standards for the Treatment of Historic Properties* apply:

- A cultural landscape is used as it was historically, or is given a new or adaptive use that maximizes the retention of historic materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a landscape is protected and, if necessary, stabilized until additional work may be undertaken.
- The historic character of a cultural landscape is retained and preserved. The replacement or removal of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a landscape is avoided.

- Each cultural landscape is recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve historic materials and features is physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
- Changes to a cultural landscape that have acquired historical significance in their own right are retained and preserved.
- Historic materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a cultural landscape are preserved.
- The existing condition of historic features is evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a historic feature, the new work matches the old in design, color, texture, and where possible, materials. Repair or replacement of features is substantiated by archeological, documentary, or physical evidence.
- Chemical or physical treatments that cause damage to historic materials are not used.
- Archeological and structural resources are protected and preserved in place. If such resources must be disturbed, mitigation measures are undertaken including recovery, curation, and documentation.

The following additional standards apply:

- Stabilization detracts as little as possible from a cultural landscape's appearance and significance. Reinforcement is concealed wherever possible so as not to intrude upon or detract from the aesthetic, historical, or archeological quality of the landscape, except where concealment would result in the alteration or destruction of historically or archeologically significant features, materials, or physical or visual relationships. Accurate documentation of stabilization procedures is kept and made available for future needs.
- Maintenance is executed by qualified technicians in accordance with approved work procedures. Where such procedures are nonexistent or incomplete, a historical landscape architect or appropriate cultural resource specialist provides technical guidance.
- All features of the cultural landscape are inspected on a scheduled basis and information about their condition is entered into ICAP.

b. Rehabilitation

Rehabilitation improves the utility or function of a cultural landscape, through repair or alteration, to make possible an efficient compatible use while preserving those portions or features that are important in defining its significance. The following standards based on the *Secretary of the Interior's Standards for the Treatment of Historic Properties* apply:

- A cultural landscape is used as it was historically or is given a new or adaptive use that maximizes the retention of historic materials, features, spaces, and spatial relationships.
- The historic character of a cultural landscape is retained and preserved. The replacement or removal of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a landscape is avoided.
- Each cultural landscape is recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features from other landscapes, are not undertaken. Work needed to stabilize, consolidate, and conserve historic materials and features is physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
- Changes to a cultural landscape that have acquired historical significance in their own right are retained and preserved.
- Historic materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a cultural landscape are preserved.
- Deteriorated historic features are repaired rather than replaced. Where the severity of deterioration requires repair or replacement of a historic feature, the new feature matches the old in design,

color, texture, and, where possible, materials. Repair or replacement of missing features is substantiated by archeological, documentary, or physical evidence.

- Chemical or physical treatments that cause damage to historic materials are not used.
- Archeological and structural resources are protected and preserved in place. If such resources must be disturbed, mitigation measures are undertaken including recovery, curation, and documentation.
- Additions, alterations, or related new construction do not destroy historic materials, features, and spatial relationships that characterize the cultural landscape. New work is differentiated from the old and is compatible with the historic materials, features, size, scale and proportion, and massing of the landscape.
- Additions and adjacent or related new construction are undertaken in such a manner that if removed in the future, the essential form and integrity of the cultural landscape would be unimpaired.

c. Restoration

Restoration accurately depicts the form, features, and character of a cultural landscape as it appeared at a specific period or as intended by its original constructed design. It may involve the reconstruction of missing historic features and selective removal of later features, some having cultural value in themselves. The following standards based on the *Secretary of the Interior's Standards for the Treatment of Historic Properties* apply:

- A cultural landscape is used as it was historically or given a new or adaptive use that interprets the landscape and its restoration period.
- Materials and features from the restoration period are retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period is not undertaken.
- Each cultural landscape is recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features from other landscapes, are not undertaken. Work needed to stabilize, consolidate, and conserve materials and features from the restoration period is physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
- Materials, features, finishes, spaces, and spatial relationships that characterize other historic periods are documented prior to their alteration or removal.
- Historic materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period are preserved.
- Deteriorated features from the restoration period are repaired rather than replaced. Where the severity of deterioration requires replacement of a historic feature, the new feature matches the old in design, color, texture and, where possible, materials.
- Replacement of missing features from the restoration period is substantiated by archeological, documentary, or physical evidence. A false sense of history is not created by adding conjectural features or features from other landscapes, or by combining features that never existed together historically.
- Chemical or physical treatments that cause damage to historic materials are not used.
- Archeological and structural resources are protected and preserved in place. If such resources must be disturbed, mitigation measures are undertaken including recovery, curation, and documentation.
- Designs that were never executed historically are not constructed.

The following additional standards apply:

- Archeological, documentary, or physical evidence is sufficient to permit accurate restoration with minimal conjecture.

- Restoration is essential to public understanding of the cultural associations of a park.
- Reinforcements required for stability of existing support systems and protective or code-required features (electrical, security, fire protection, handicapped accessibility, etc.) are concealed whenever possible so as not to intrude upon or detract from a cultural landscape's aesthetic and historical qualities, except where concealment would result in the alteration or destruction of historically significant features, materials, or physical or visual relationships.

d. Reconstruction

Reconstruction entails depicting the form, features, and details of a non-surviving cultural landscape, or any part thereof, as it appeared at a specific period or as intended by its original constructed design. Reconstruction of an entire landscape is always a last-resort measure for addressing a management objective and will be undertaken only upon specific written approval of the director after policy review in the Washington office. The following standards based on the *Secretary of the Interior's Standards for the Treatment of Historic Properties* apply:

- Archeological, documentary, or physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to public understanding of the cultural associations of a park established for that purpose.
- Reconstruction of a cultural landscape in its historic location is preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. Mitigation measures are undertaken including recovery, curation, and documentation.
- Reconstruction includes measures to preserve any remaining historic material, features, and spatial relationships.
- Reconstruction is based on the accurate duplication of historic features substantiated by archeological, documentary, or physical evidence, rather than on conjectural designs or the availability of different features from other landscapes. A reconstructed cultural landscape re-creates the appearance of the non-surviving landscape in design, color, texture, and, where possible, materials.
- A reconstruction is clearly identified as a contemporary re-creation.
- Designs that were never executed historically are not constructed.

The following additional standards apply:

- The reconstructed cultural landscape is full-scale and on the original site.
- The reconstruction does not simulate a damaged or ruined cultural landscape or constitute a general representation of a "typical" landscape, e.g., kitchen garden, period garden, orchard, that never existed historically.

2. Biotic Systems Treatment

This section contains standards addressing the special issues related to the treatment of biotic systems. Virtually all cultural landscapes evolve from and are dependent on natural resources. In many ways, the dynamic qualities inherent in natural systems are what differentiate cultural landscapes from other cultural resources. Plant and animal communities associated with human settlement and use are considered *biotic cultural resources* and can reflect social, functional, economic, ornamental, or traditional uses of the land. Within a cultural landscape, biotic cultural resources are recognized either as a system or as individual specimen features that contribute to the landscape's significance. For example, the preservation of a single tree in a historic designed landscape may be critical to the integrity of the overall design. A herd of a historic variety of livestock may have similar significance in a historic vernacular landscape. In contrast, an entire woodland may have significance, so that preserving the ecological processes of the system rather than individual trees or animals becomes paramount. In all cases, consultation with natural resource professionals is necessary to determine appropriate protection and management strategies for biotic cultural resources.

General standards for managing vegetation in a cultural landscape are followed by specific standards and guidance for managing specimen plants, vegetation systems, pests, and endangered species. (Additional guidance for management of biotic resources is found in the *Natural Resources Management Guideline* [NPS-77].)

- Existing vegetation, both native and introduced (exotic), that contributes to the historic character of a cultural landscape or is important to a traditional user group is identified, maintained, and perpetuated, as appropriate. Special consideration is given to introduced species because they may be important clues to the history of the landscape, they may include plant varieties that are rare or endangered, or they may be mistaken as "pests" and removed.
- Maintenance methods are used that promote the health and vigor of the vegetation and respect either the natural habit of growth or the trained form of the plant material related to the historic character of a cultural landscape.
- Treatment of vegetation is based on an understanding of the functional, design, and associative values of the plant material in a cultural landscape.

a. Specimen Plant Management

Specimens include both individual plants and aggregations of plants that have distinct, unique, or noteworthy characteristics in a landscape such as individual trees and shrubs, ornamental plantings, perennial borders, gardens, and orchards. In some cultural landscapes, it is important that specific types of plant materials and the location, shape, and form of these materials be retained and perpetuated based on their historic character and significant values. The primary considerations in managing specimen plants are to ensure their health and vigor and, if appropriate, provide for propagation of the next generation. Perpetuation of historic genetic material is especially important when cultivars are rare or unavailable. The following standards apply:

- Extant historic vegetation considered significant as a specimen in a cultural landscape is identified and maintained.
- Perpetuation of historic genetic material, through propagation or other means, is undertaken when plants are rare or have important historical associations or when replacements are unavailable.
- Significant vegetation that causes damage to or threatens other resources is controlled rather than removed whenever feasible.
- Replacement of plant material matches the original in type, location, form, and shape.
- Substitution of plant material is considered in response to changes in growing conditions, susceptibility to disease and pests, or the unavailability of original material. Substitute material matches the historic material in visual, functional, and horticultural characteristics. Varieties resistant to disease, pests, and pollution are used where they meet these standards. Accurate records of substitutions are kept.
- Removal of vegetation that threatens health and safety is preceded by adequate documentation and followed by replacement if appropriate.

b. Vegetation Systems Management

In managing vegetation systems, the overall pattern of vegetation is the primary concern. Elements of pattern include height and general scale and the size and juxtaposition of areas with different vegetation. Exact configurations and plant species can vary as long as the overall pattern is retained. Forests, woodlands, woodlots, and most agricultural lands are examples of vegetation systems. The following standards apply:

- The need for succession through several stages to retain healthy communities is considered in managing forests, woodlands, and woodlots. On agricultural lands, the value of crop rotation, fallow periods, and succession into woodland is considered.
- Consideration is given to the effects of vegetation on the nutrient regime of water bodies and the stability of banks. Erosion is minimized using vegetation or other materials compatible with the historic character of the cultural landscape.

- Vegetation management activities associated with ground disturbance are monitored to ensure the protection of archeological and other cultural resources, such as the remains of roads and traces, fence lines, hedgerows, earthworks, subsurface features, and other structures.
- Areas that meet the definition of wetland generally are excluded from agricultural use. If agricultural use is allowed in wetland areas, appropriate measures are taken to monitor impacts.
- Historic exotic species are monitored and controlled to avoid spreading and disrupting desirable adjacent natural plant communities and associations. Historically inappropriate exotic species are not introduced.

c. Pest Management

A pest is defined as a population of organisms that interferes with the accomplishment of management objectives. Integrated pest management (IPM) involves taking steps to prevent pest problems, monitoring to detect when a pest population reaches a predetermined threshold level considered unacceptable, and using a combination of approaches to control pests in a manner that will be most effective, safest to people, and most environmentally sound. (For additional information on IPM see the *Natural Resource Management Guideline*.) The following standards apply:

- Landscape management practices that contribute to pest problems are identified and alternate practices that maintain the historic character of a cultural landscape are considered.
- When appropriate, pest-resistant varieties are used to minimize pest-caused damage to features of a cultural landscape and the need for pesticides.
- All use of biocides complies with the standards and procedures in the *Natural Resources Management Guideline*.

d. Endangered Species

Federally or state-listed threatened or endangered species must receive utmost protection. They may be considered "specimens" within the cultural landscape system. (For additional information on endangered species, see the *Natural Resources Management Guideline*.)

3. Inventory and Condition Assessment Program (ICAP)

ICAP, a module of the Maintenance Management (MM) program, assists in planning for the maintenance and major treatment of cultural landscapes through an inventory and condition assessment of their features. ICAP generates annual inspection forms and other reports, develops a preventive maintenance program, and uploads data into the park MM program.

The Historic Property Preservation Database (HPPD) is a computerized database containing technical information on the treatment of cultural landscapes and historic and prehistoric structures. It is used to develop work procedures for ICAP and MM, including skill requirements, work consideration, material and equipment selection, and work instructions. The HPPD also provides information for more intensive treatments such as rehabilitation and restoration.

(For additional information see the ICAP *Reference Manual* and *Computer User Manual*.)

4. Partnerships

NPS fee ownership and occupancy of a cultural landscape provides park managers the greatest flexibility. However, when the integrity of a landscape can be maintained and long-term management objectives realized with the property held or occupied by others, acquisition of less-than-fee interests or special use agreements should be considered. (For further information see Director's Order 27, "Historic Property Leases and Exchanges," the *Special Park Uses Guideline* [NPS-53], and the *Park Planning Guideline* [NPS-2].) The following standards apply to the acquisition and control of lands containing or contributing to a cultural landscape:

a. Acquisition of Lands and Interests

- The fee-simple acquisition of lands is undertaken where necessary to ensure the protection of significant features and uses associated with a cultural landscape.
- The use of easements to protect a cultural landscape takes into account the economic viability of continuing their historic uses and the ability and desire of owners to continue those uses.
- Easements on agricultural lands address the protection of significant small-scale features within a cultural landscape, such as historic roads and paths, hedgerows, fences, and specimen trees. The ability of owners to preserve and maintain such features over time is evaluated to ensure compliance.

b. Leases and Agreements

- Agricultural leases and agreements are managed to protect significant features of a cultural landscape, such as topography, field size, fences, walls, ditches, vegetation, wetlands, earthworks, structures, and vistas.
- Archeological surveys are undertaken as necessary to ensure that modern farming techniques will not destroy subsurface resources.
- Modifications prompted by modern farm machinery and practices, including the alteration of historic buildings, lanes, roads, fences, and gates and the introduction of nonhistoric crops, field patterns, and pruning techniques, are minimized to protect significant landscape features and patterns.
- Landscape support facilities resulting from leases and agreements, such as parking areas and signs, are not allowed to diminish the integrity of a cultural landscape.

c. Adjacent Lands

- Adjacent lands significant to the physical, functional, or symbolic cultural landscape context of the park are identified.
- Direct impacts of adjacent land development on a park cultural landscape are identified, such as removal of woodlands; development and/or reforestation of traditionally "open" lands; alteration of historically significant field patterns; alteration of topography, streams, and watercourses impacting existing natural systems; and alteration of historic vistas.
- Indirect impacts of adjacent land development on a park cultural landscape are identified, such as increased commuter traffic on park roads, storm water runoff or restricted overland flow impacting park vegetation or generating erosion and pollution, increased pressure for the park to serve local recreational needs, higher taxes or land values rendering local agriculture unprofitable, and use of pesticides and herbicides that may negatively impact natural resources.
- Potential impacts of adjacent land development on the cultural landscape context of parks are addressed through park involvement in the planning processes of local jurisdictions.

5. Destruction or Neglect of Cultural Landscapes

No cultural landscape listed in or potentially eligible for the National Register or listed in the Cultural Landscapes Inventory will be destroyed or deliberately neglected without review by cultural resource specialists and approval by the regional director. If a potentially eligible landscape has not been evaluated for the National Register, the state historic preservation officer will be consulted. If it is determined, in consultation with the SHPO, that the landscape does not meet the National Register criteria, destruction or deliberate neglect may occur. In some cases, neglect is the appropriate action to protect archeological resources and the natural resources and processes that may have cultural or ethnographic value.

Before a landscape eligible for the National Register is destroyed or allowed to deteriorate, it must be documented in accordance with Section 110(b) of the National Historic Preservation Act, and the documentation must be accepted by the Chief, HABS/HAER Program.

6. Special Issues

a. Cemeteries

Cemeteries in parks may have significance as repositories of the remains of individuals having local, state, or national importance; as places associated with historic events or figures not interred therein (e.g., Gettysburg National Cemetery for its association with Abraham Lincoln); or because of individual structures of high artistic or architectural merit. In addition, some cemeteries are significant cultural landscapes because they represent a type of burial ground (family), because they typify a broad social movement or pattern (the slave burial ground), or because in plan and execution they were seminal designs (early examples of the "rural" cemetery movement) or works of important designers. The following standards address treatment of park cemeteries, including those in private ownership.

- The cemetery is managed in a manner that recognizes its significance and preserves and interprets the cultural landscape as a whole. The character-defining features of the cemetery, such as general organization and layout, plant materials, roads and pathways, fences, and the placement of statuary and grave markers, are documented and incorporated in a maintenance program.
- Maintenance activities do not impair the significant character and individual features of the cultural landscape. Mowing, weed whipping, and use of commercial herbicides immediately next to grave markers are avoided.
- The repair, cleaning, consolidation, and resetting of grave markers is supervised by a historical architect and other professionals, as appropriate.
- New landscape features are compatible with the original design and character of the cemetery and do not negatively impact the significant built or natural features (e.g., new trees are planted so that roots will not later damage or disrupt grave markers and curbing).

(For further information see the *National Cemeteries Guideline* [NPS-61].)

b. Circulation Systems

In many parks, the roads, parkways, and trails are significant historic circulation systems. A circulation system may constitute a cultural landscape in and of itself, such as Going-to-the-Sun Road in Glacier National Park, or it may be an integral feature of a cultural landscape. Key features of circulation systems, such as topography, bridges, headwalls, retaining walls, culverts, and views, are important to defining the overall character of the landscape. The following standards apply:

- Historically significant circulation systems and their associated features are not adversely impacted to accommodate recreational vehicles, buses, commuter traffic, or other contemporary uses.
- Plans for the treatment of structural features that are parts of historically significant circulation systems are developed in consultation with a historical architect.
- Historic circulation systems are rehabilitated to accommodate health and safety codes in ways that minimize impact on character-defining features.

c. Earthworks

Earthworks are linear or geometric landscape structures built for military, industrial, agricultural, ceremonial, or aesthetic purposes. They include fortifications, water impoundment and control structures, early field boundary ditches and berms, burial mounds, grass garden ramps, and raised beds. Because of their composition, earthworks are constantly being impacted by a variety of natural forces. The long-term preservation of earthworks commonly requires an appropriate vegetative cover that may differ from the historic material. The following standards apply:

- Earthworks are maintained with a healthy, vigorous vegetation cover to minimize erosion and loss of integrity.
- Circulation and visitor use facilities are located and controlled to avoid impacting earthworks.

(For more information see the *Earthworks Landscape Management Manual* and *Earthworks Landscape Management Field Handbook* [full citations in Appendix K].)

d. Monuments, Memorials, and Landscape Remnants

Monuments and memorials are defined as structures and included in the List of Classified Structures. They are often significant components of cultural landscapes and may be cultural landscapes in their own right. The siting, orientation, plantings, paving materials, roads, and pathways designed as an integral part of a monument or memorial should be considered part of the feature and managed as a whole. In addition, remnant objects may have cultural value as landscape features. Their treatment should be developed in collaboration with a historical architect or curator.

At battlefields and other military sites, artillery pieces need to be evaluated in terms of their relationship to the historic landscape. A piece of ordnance may be part of a planned memorial design and significant as a structural feature of the landscape or it may be strictly an interpretive device without site-specific significance. If the ordnance is fixed in position it is defined as a structure; if it is not fixed it is defined as a museum object and may be part of the museum collection. In both cases, the relocation of artillery pieces should be evaluated based on their significance in the context of the overall design of the historic landscape.

CHECKLIST FOR MANAGEMENT OF CULTURAL LANDSCAPES

RESEARCH:

- The historic contexts and significant characteristics and features of cultural landscapes are identified and documented in historic resource studies.
- All landscapes eligible for the National Register of Historic Places have been identified and nominated.
- All cultural landscapes are listed in the Cultural Landscapes Inventory.
- Documentary research and physical investigation are sufficient to support treatment.
- Cultural landscape reports are prepared for all cultural landscapes.
- Work procedures and major assessments are complete in an ICAP format.
- All records associated with cultural landscape studies, including maps, field notes, photographs, soil or pollen analyses, and construction files, are properly organized and placed in the park museum collection.
- All professional reports and publications are entered in the Cultural Resources Management Bibliography.

PLANNING:

- All cultural landscapes are appropriately addressed in the park's general management plan, development concept plan(s), resources management plan, and interpretive prospectus.
- Plans and specifications for all preservation, rehabilitation, restoration, and reconstruction work are prepared by a historical landscape architect.
- Required consultation and legal compliance is carried out before any work is initiated, and the concerns of consultants are taken into account in decision-making.

STEWARDSHIP:

- Actions identified in a cultural landscape report are implemented and a record of treatment is added to the report.
- All work is performed by qualified people in conformance with approved plans and specifications or work procedures.

- All maintenance personnel who work with cultural landscapes are given appropriate preservation training.
- All cultural landscapes are inspected at least annually in an ICAP format.
- All ground disturbance in cultural landscapes is cleared or monitored by an archeologist.
- The entire park staff is made aware of the significance of cultural landscapes and the major threats to them.

CHAPTER 8: MANAGEMENT OF HISTORIC AND PREHISTORIC STRUCTURES

A. Introduction

1. Resource Definition

A historic structure is "a constructed work . . . consciously created to serve some human activity." Historic structures are usually immovable, although some have been relocated and others are mobile by design. They include buildings and monuments, dams, millraces and canals, nautical vessels, bridges, tunnels and roads, railroad locomotives, rolling stock and track, stockades and fences, defensive works, temple mounds and kivas, ruins of all structural types, and outdoor sculpture.

Prehistoric structures are included in this chapter because the technical aspects of their preservation are similar to those of many historic structures. All prehistoric structures are also archeological resources, and some are ethnographic resources. They should therefore be managed within the general provisions of Chapters 6 and 10, particularly with respect to research and planning. Prehistoric structures are further distinguished by National Park Service policy limitations on their use and treatment. Given these qualifications, the term "historic structure" in this guideline is meant to encompass prehistoric structures unless otherwise stated.

2. Program Objectives

According to both federal law and NPS *Management Policies*, all historic structures in which the Service has a legal interest are to be managed as cultural resources. Regardless of type, level of significance, or current function, every structure is to receive full consideration for its historical values whenever a decision is made that might affect its integrity. Historic structures that are central to the legislated purposes of parks, especially those that are to be interpreted, may be subjects of additional, specialized efforts appropriate to their functions and significance.

The preservation of historic structures involves two basic concerns: slowing the rate at which historic material is lost, and maintaining historic character. Research on, planning for, and stewardship of historic structures focus on these concerns. Research defines historical associations, integrity, character, and the causes of material deterioration; planning develops and evaluates proposals for use and treatment in terms of their likely effects; and stewardship entails activities ranging from craft training to the identification and mitigation of threats.

Preservation of historic structures is an interdisciplinary effort requiring cooperation and communication among historical architects, architectural conservators, preservation specialists, archeologists, landscape architects, historians, ethnographers, and curators.

B. Research

Research about historic structures is a prerequisite for treatment and provides a basis for decision-making by managers. Situations benefiting from research-generated information range from review of weekly maintenance projects to long-term planning projects. Research also contributes to interpretation, compliance, and facility design.

To accomplish these purposes, research typically concentrates on three broad aspects of a historic structure: its historical, technical, aesthetic, or scientific associations; its developmental history or evolution; and the nature, performance, and capability of its materials and systems. This information is collected, analyzed, and organized through a variety of means, discussed below.

1. Identification, Evaluation, and Registration

Section 110 of the National Historic Preservation Act requires the NPS to identify and nominate to the National Register of Historic Places all structures and other properties under its jurisdiction that appear eligible. Historical areas of the national park system are automatically listed in the National Register in toto upon their establishment by law or executive order, but those structures and other features within them that contribute to their historical significance must still be documented for Register purposes.

a. Historic Resource Study

The historic resource study (HRS) is the primary document used to identify and manage the historic resources in a park. It is the basis for understanding their significance and interrelationships, a point of departure for development of interpretive plans, and the framework within which additional research should be initiated.

Although structures may be nominated to the National Register on an individual basis, they are most efficiently processed as part of an HRS. (For more guidance see "Baseline Research Reports" in Chapter 2.) With respect to historic structures, an HRS is adequate when three conditions–required for National Register nomination–are met. First, the thematic context must be sufficient to evaluate historical, aesthetic, technical, or scientific associations of structures within the study area. Second, the HRS must contain enough information about the developmental history or evolution of each structure to evaluate its integrity. Third, the study must contain enough information about the contributing environment of each structure to enable National Register boundaries to be defined and possible overlaps with cultural landscapes and archeological or ethnographic resources to be identified.

Research on structures or topics that were not included in an earlier HRS should be published as an addendum to that document.

b. National Register Nominations

National Register nominations may be prepared either for individual structures or for groups of structures. Collective nominations are appropriate for structures that are physically related, as in a historic district, or thematically related, as in a multiple property nomination. (For additional guidance see "Resource Identification, Evaluation, and Registration" in Chapter 2.)

As noted in the introduction to this guideline, the cultural resource types in the NPS *Management Policies* and this guideline are adaptations for management purposes of the property categories used by the National Register. Park resources classified as structures may be listed as buildings, structures, or objects in the National Register. Historic and prehistoric structures also may be included in the Register as contributing elements of historic districts, either as components of developed areas or as landscape features.

c. List of Classified Structures

The List of Classified Structures (LCS) is the primary computerized database containing information about historic and prehistoric structures in which the NPS has or plans to acquire any legal interest. Properties included in the LCS are either in or eligible for the National Register or are to be treated as cultural resources by law, policy, or decision reached through the planning process even though they do not meet all National Register requirements. Data fields in the LCS include identification, category of significance, condition, use, threats, treatments, cost estimates for treatments, and physical description.

The LCS has three major applications: (a) to describe historic structures on an individual or collective basis at park, regional, or Service-wide levels, (b) as a common information source for other automated management systems such as the Maintenance Management (MM) program and the Housing Inventory, and (c) as an analytical tool in budgeting, scheduling, and program development.

(For more information see "Service-wide Inventories" in Chapter 2 and the List of Classified Structures [LCS] User's Manual, 1993.)

d. Categories of Significance

All cultural resources are managed under a uniform standard of preservation responsibility. The following categories of significance are used to establish LCS management categories, determine appropriate levels of graphic documentation, and make other related management decisions for prehistoric and historic structures within the national park system.

Category Ia: Individual structures that qualify as national historic landmarks, are listed in the National Register as nationally significant, or that possess national significance by act of Congress or executive order.

Category Ib: Structures that do not possess national significance on an individual basis, but contribute to the national significance of a park or historic district.

Category II: Structures that individually or collectively qualify for the National Register and possess significance at the state level.

Category III: Structures that individually or collectively qualify for the National Register and possess significance at the local level.

2. Documentation and Investigation

As a rule, research about a historic structure should complement existing information and strive to produce a comprehensive understanding of the structure in order to adequately address management objectives. Research effort should be proportional to the significance of the structure and the range of effects associated with the objectives. Although individual features, areas, or systems may be emphasized, research should approach the structure as a whole.

Research needed to supply missing information should be defined in terms of subject, scope, and level of investigation. The subject may range from one feature on a single historic structure to a complex of structures. Scope includes but is not limited to thematic context, physical documentation, temporal associations, developmental history, scientific value, and material analysis. Level of investigation describes the nature and location of sources to be consulted and the degree to which extant material will be disturbed or destroyed during research. These considerations are described in the task directive and research design for every substantial research effort. (See "Research Methodology" in Chapter 2.)

Destructive techniques, such as archeological excavation and selective demolition, should be used only when alternatives are inadequate to provide information essential for evaluating, planning for, treating, or interpreting a historic structure. Any research that would directly impact a cultural resource must be reviewed in advance through the compliance process. Research involving prehistoric and some historic structures may also require consultation with Native Americans or other associated ethnic groups.

a. Historic Structure Report

The historic structure report (HSR) is the primary guide to treatment and use of a historic structure and may also be used in managing a prehistoric structure. A separate HSR should be prepared for every major structure managed as a cultural resource. Groups of similar structures or ensembles of small, simple structures may be addressed in a single report. In no case should restoration, reconstruction, or extensive rehabilitation of any structure be undertaken without an approved HSR, Parts 1 and 2.

An HSR includes the following:

Management Summary. This is a concise account of research done to produce the HSR, major research findings, major issues identified in the task directive, and recommendations for treatment and use. Administrative data on the structure and related studies are included.

Part 1, Developmental History, is a scholarly report documenting the evolution of a historic structure, its current condition, and the causes of its deterioration. It is based on documentary research and physical examination. The scope of documentary research may extend beyond the physical development of the structure if needed to clarify the significance of the resource or to refine contextual associations; however, major historical investigation of contextual themes or background information should be conducted as part of a historic resource study. If the Inventory and Condition Assessment Program (ICAP) is used to describe the nature and condition of features, resultant reports (e.g., the historic asset assessment report) should be included in the HSR's appendix.

Part 2, Treatment and Use, presents and evaluates alternative uses and treatments for a historic structure. Emphasis is on preserving extant historic material and resolving conflicts that might result from a structure's "ultimate treatment." Part 2 concludes by recommending a treatment and use responding to objectives identified by park management. In most cases, design work does not go beyond schematics.

Part 3, Record of Treatment, is a compilation of information documenting actual treatment. It includes accounting data, photographs, sketches, and narratives outlining the course of work, conditions encountered, and materials used.

All aspects of a historic structure and its immediate grounds should be addressed in an HSR. Potential overlaps with other cultural resource types and natural resource issues should be identified, and applicable studies and reports should be called for or referenced. An HSR and analogous reports (e.g., a cultural landscape report) may be combined to address multiple resource types at a single property or area.

MODEL HSR CONTENTS

i. i. Cover Page
ii. ii. Table of Contents
iii. iii. Executive Summary. This introductory text provides a concise account of (a) research done to produce the HSR, (b) major research findings, (c) major issues identified in the task directive, and (d) recommenda-tions for treatment or use. Deviations from general planning documents should be identified here and discussed more fully in the body of the report.
iv. iv. Administrative Data. This section contains (a) names, numbers, and locational data used to refer to the historic structure, (b) the proposed treatment of the structure including the source document, (c) related studies, (d) cultural resource data including date listed in the National Register, period of significance, and context of significance, and (e) recommendations for documentation, cataloging, and storage of materials generated by the HSR.

PART 1. DEVELOPMENTAL HISTORY

A. A. Historical Background and Context. This section briefly describes the people and events associated with the structure. The section should establish a recommended period or periods of significance if this has not been done in the National Register nomination or historic resource study (HRS).
B. B. Chronology of Development and Use. Physical construction, modification, and use of the struc-ture is summarized in this section. The text should be based on historical documentation with corroboration from first-hand observation and materials analysis.
C. C. Physical Description. This section contains a systematic accounting of all features, materials, and spaces according to age, significance, and condition. Copies of computer-generated inspection reports should be included in the appendix but summarized in the body of the chapter. The text should also discuss causes of deterioration and structural adequacy.

PART 2. TREATMENT AND USE

A. A. Ultimate Treatment and Use. This narrative discusses and analyzes the ultimate treatment and use of the structure as defined in park planning documents. If they have not been defined, this section may recommend an ultimate treatment and use. If analysis of the structure suggests that a planned treatment or use would adversely affect it, the text may present an alternative approach.

B. B. Requirements for Treatment. In concise terms, this text outlines applicable laws, regula-tions, and functional requirements. Specific attention should be given to issues of human safety, fire protection, energy conservation, abatement of hazardous materials, and handicapped accessibility.

C. C. Alternatives for Treatment. This section presents and evaluates alternative approaches to realization of the ultimate treatment. Alternatives are presented in both text and graphic form. Analysis addresses the adequacy of each solution in terms of impact on historic materials, effect on historic character, compliance with NPS policy, and other management objectives. The section concludes with elaboration on the recommended course of action and specific recommendations for preservation treatments.

PART 3. RECORD OF TREATMENT

A. A. Completion Report. This section summarizes (a) the intent of the work, (b) the way in which the work was approached and accomplished, (c) the time required to do the work, and (d) the cost of the work. It also describes any information about the history of the structure based on physical evidence discovered during construction.

B. B. Technical Data. This portion of the report contains copies of field reports, material data sheets, field notes, correspondence, accounting spread sheets, and contract summaries.

APPENDIX

Bibliography

Drawings

Photographs

Materials Analysis

Parts 1 and 2 of an HSR should be prepared jointly as part of a comprehensive effort soon after acquisition of a structure or recognition of its status as a cultural resource. Given funding and time constraints, however, an HSR may be prepared incrementally. Incremental research and design should also be considered when a complete HSR does not exist or an existing HSR does not adequately address aspects of a proposed treatment such as replication of missing features, removal of significant features or large amounts of historic material, or introduction of new systems or exterior additions. In no case should a Part 2 be prepared without a Part 1.

The scope, level of investigation, and extent of schematic development are outlined in a task directive that is based on the recommendations of a historical architect in consultation with other cultural resource specialists and the park manager. Major factors considered in developing the task directive include the structure's significance, condition, and intended use. The task directive should also address participation of other cultural resource specialists and publication of the document.

The following standards apply:

- A historic structure report (HSR) is prepared to minimize loss of character-defining features and materials whenever existing information about the developmental history and condition of the historic structure does not provide an adequate basis upon which to address anticipated management objectives, whenever alternative courses of action for impending treatment and use could have adverse effects, or to record treatment.
- Architectural, landscape, and archeological investigations supporting an HSR have the least possible impact on the property studied and employ nondestructive methods to the maximum extent possible; they are prescribed and justified in a task directive that includes a research design and impact analysis.

b. Graphic Documentation

Documentation of historic structures is undertaken to record preservation treatment, provide a baseline for monitoring, aid in interpretation, support scholarly research, and serve as an objective reference for repair or reconstruction in the event of damage or loss. The scope, method, and level of documentation of a structure should be proportional to its significance as a cultural resource, the character of its features, the degree to which it is endangered, and the ways in which the documentation is most likely to be used.

All documentation is done in conformance with the *Secretary of the Interior's Standards for Architectural and Engineering Documentation* (see Appendix C). Where recording is done to establish a baseline for planning or before demolition, the following documentation levels are recommended: Level I for Category Ia structures, Level II for Category Ib structures, Level III for Category II structures, and Level IV for Category III structures.

New materials and replacement features introduced should be recorded in place with photographs or drawings that clearly indicate their extent. Physical evidence of the developmental history of a structure should be recorded before being removed or covered during treatment. Copies of task directives, daily reports, and change orders should also be retained in park files.

c. Archival Considerations

Although comprehensive, in-depth research is an ideal foundation for preservation work, most information about historic structures is collected on a piecemeal basis throughout the resource management process. Primary information sources include contextual studies, records of treatment, records of structural monitoring, photographic and graphic documentation, and reports of material analysis and archival research. To maximize the benefit of this work and minimize potential data loss, all field notes, primary documents, original maps, drawings, photographs, material samples, and oral histories generated during resource management are organized and preserved as archival material or museum objects in consultation with the park or support office curator.

C. Planning

Planning for historic structures encompasses such diverse activities as involvement in park planning, facility design, preparation of maintenance work procedures, and compliance. The central purpose of all such activities is to identify ways of protecting cultural resources while achieving other management objectives. This is usually best done by thoughtful evaluation of a diverse range of alternatives.

General direction for managing a park's historic structures is provided in its general management plan, development concept plan(s), interpretive prospectus, and resources management plan. Action plans that may affect historic structures include historic furnishing reports and cultural landscape reports. Historic structures may also figure prominently in planning for special populations and fire and energy management.

Treatment and use are the central issues in planning for historic structures. Closely related concerns include consideration of park administrative and interpretive needs, compatibility of new and old development, accommodation of building codes and contemporary regulations, and the overall condition of the structures.

1. Treatment Planning

Historic structure treatment involves one or more of the following actions: (a) preservation of existing materials, (b) replication of missing historic features, (c) addition of nonhistoric features, and (d) removal of existing features or materials.

Decisions about treatment occur at three planning levels. First, the ultimate treatment of a structure is established in the park's general management plan or development concept plan. Second, major conflicts inherent in the ultimate treatment or other related treatments are identified and resolved through an HSR, Part 2. Third, plans and specifications are prepared to direct construction or preservation maintenance. Standardized direction for preservation maintenance is provided by work procedures contained in the Historic Property Preservation Database (HPPD).

Decisions about treatment should reflect the value of a structure as a cultural resource, knowledge of craft techniques and building materials, consideration of current and intended uses, appreciation of threats to the structure, and projections of treatment costs relative to likely funding.

a. Ultimate Treatment

The ultimate treatment of a historic structure is a general definition of its development limits based on considerations of use and the historic character that should be presented to the public. It is accomplished through one or more construction projects, after which the structure is preserved by preservation maintenance. Subsequent rehabilitation or restoration may be needed to update the structure's functional aspects and to repair or replace damaged or deteriorated features. Pending ultimate treatment, a structure is stabilized and protected in its existing condition; it may also receive interim treatment compatible with its planned appearance and use.

The categories of ultimate treatment are preservation, rehabilitation, restoration, and reconstruction.

Preservation as an ultimate treatment maintains the existing integrity and character of a historic structure. This alternative precludes uses that would require major additions or demolition. It should always receive first consideration.

Rehabilitation maintains the existing integrity and character of a historic structure, but allows major additions or alterations to accommodate a compatible contemporary use. Rehabilitation does not apply to prehistoric structures, ruins, monuments, or outdoor sculpture, nor should it be the ultimate treatment for historically furnished historic structures even though they may require major modifications to perform as such.

Restoration reestablishes the form, features, and character of a historic structure at a specific past period. Restoration may be comprehensive or focus on the exterior. Complete restoration is done primarily to Category Ia structures and structures containing historic furnishings, although secondary aspects of their interiors may be adaptively used. Exterior restoration applies primarily to Category Ib structures and some Category Ia structures that are integral to the historic settings of parks. Treatment and use of their interiors must meet corresponding standards and must not affect the desired exterior appearance. *Management Policies* permits restoration only if (a) it is essential for public understanding of the cultural associations of a park and (2) it can be accomplished with minimal conjecture based on sufficient data. Restoration of prehistoric or historic ruins is prohibited.

Reconstruction produces a new structure identical in form, features, and details to a historic structure that no longer exists. *Management Policies* permits reconstruction only if (a) it is essential for public understanding of the cultural associations of a park established for that purpose, (b) the structure can be built at full scale on the original site with minimal conjecture, and (c) significant archeological resources will be preserved in situ or their research values will be realized through data recovery. Meeting the first criterion requires a demonstration that no other interpretive media or techniques can render the park's primary theme comprehensible to visitors. Reconstruction will be undertaken only upon specific written approval of the director after policy review in the Washington office.

b. Historic Property Preservation Database (HPPD)

The HPPD is a computerized database containing technical information on the treatment of historic and prehistoric structures and cultural landscapes. It contains work procedures for the Inventory and Condition Assessment Program (ICAP) and Maintenance Management (MM) program. Work procedures include skill requirements, work consideration, material and equipment selection, and work instructions. The HPPD also contains information for more intensive treatments such as rehabilitation and restoration.

c. Removal or Neglect

Demolishing a historic structure or deliberately allowing it to decay naturally is justifiable only when all alternatives have been determined infeasible in the planning process. *Management Policies* prohibits demolition unless necessary for public safety or to eliminate an unacceptable intrusion.

No structure listed in or potentially eligible for the National Register will be removed or deliberately neglected without review by cultural resource specialists and approval by the regional director. If a

potentially eligible structure has not been evaluated for the National Register, the state historic preservation officer (SHPO) will be consulted regarding its eligibility. If the SHPO agrees that the structure does not meet National Register criteria, removal or deliberate neglect may occur without further consultation under Section 106 of the National Historic Preservation Act.

Before a structure eligible for the National Register is removed or allowed to deteriorate, documentation recording it must be prepared in accordance with Section 110(b) of the National Historic Preservation Act and must be submitted to and accepted by the Chief, HABS/HAER Program. (For additional information see "Graphic Documentation," above.)

2. Use of Historic Structures

Many historic (but not prehistoric) structures directly support park functions by serving as visitor centers, housing, or administrative offices. Some such uses follow historical precedents; others are new, adaptive uses. The primary preservation issue in either case is the compatibility of the use with the structure. Considerations include wear patterns, adequacy of space and spatial configurations, the need for new electrical or mechanical systems, increases in fire risk, and changes necessary to accommodate disabled employees or visitors. Whenever possible, historic structures should be used rather than new facilities constructed.

Historic (but not prehistoric) structures may be assigned to other entities through leases, permits, or concession agreements if there are no feasible NPS uses. (See "Partnerships," below.)

a. Park Housing

The Federal Employees Quarters and Facilities Act of 1964 (P.L. 88-459) authorizes agencies to provide employee housing at fair-market rental value when necessary service or protection cannot otherwise be rendered or when community housing is inadequate.

NPS policy allows historic structures to be used for housing when "a given historic structure can be rehabilitated to meet housing standards without adversely affecting its historic character and if the rehabilitated structure will meet a need identified in the Park Housing Management Plan." Housing in Category Ia and Ib structures or structures used in part as museums is generally inappropriate.

(For more information see the *Housing Design and Rehabilitation Guideline* [NPS-76] and the *Government Furnished Housing Guideline* [NPS-36].)

b. Museums

Historic structures are often expected to house museum objects including historic furnishings. The furnishings may be historically associated with the structures or replacement items of the same vintage. While such museum use may be appropriate and even mandated, the requirements of collection management and the effects of public access should first be thoroughly explored and evaluated through preparation and approval of an HSR. Specific issues to be studied include energy utilization, accessibility, security and fire protection, and environmental control.

Historic structures containing related historic furnishings are managed so that measures to meet curatorial standards and measures to meet structure preservation standards are balanced. Proposals to furnish a historic structure with replacement or reproduction furnishings should be carefully evaluated to ensure that physical work to meet curatorial standards will not entail unacceptable adverse effects on the structure.

3. Commemorative Works and Plaques

Commemorative works will be erected in parks only if authorized by Congress or approved by the director. Approved commemorative works will be sited to avoid disturbance of natural and cultural resources and values. Plaques or other memorial devices will not be affixed to historic structural material.

Construction of a commemorative work will not be approved until a determination is made that the work will meet NPS design and maintenance standards. Recommendations for approval will be made by persons

qualified in the fields of preservation, park design, and maintenance. Once constructed, commemorative works will be listed in the LCS and managed as cultural resources. (See *Management Policies* 9:17.)

4. Codes, Regulations, and Contemporary Development

Although historic structures that functionally serve park staff or visitors are generally expected to meet modern safety, access, and energy efficiency standards, their character may impose limitations on functional modifications and adjacent development.

a. Design Compatibility

Contemporary additions or development adjacent to historic structures should be designed to complement the structures' visual and physical characteristics. Concern for the compatibility of additions extends to both the exteriors and interiors of historic structures. Special attention should be given to new construction within historic districts.

A new structure or addition will be compatible if it maintains the overall pattern of development in the area and is visually unobtrusive in terms of scale, texture, and continuity of architectural style or tradition. Scale is defined in terms of similar or harmonious proportions, especially height and width. Texture refers to the surface quality of materials, especially reflection of light. Continuity encompasses such characteristics as use of color, internal organization of space, massing, roof forms, architectural details, site relationships, palette of materials, and placement of windows and doors. Unless a new structure is a reconstruction, it should not duplicate or mimic a historic structure.

b. Accessibility

With the exception of prehistoric structures, every historic structure should be made accessible to all visitors and employees to the highest degree feasible. As a general rule, a historic structure is expected to meet all requirements for accessible buildings outlined in section 4.1.6 of the *Uniform Federal Accessibility Standards* (UFAS; 49 FR 31528). If the Advisory Council on Historic Preservation finds that compliance with the requirements would threaten or destroy the historical integrity of a historic building, alternative requirements outlined in section 4.1.7(3) of UFAS may be followed.

Alternatives to physical access for public programs may be considered if the Advisory Council determines that measures required for access would unacceptably compromise a building's historical integrity or character. (For additional information see *Accommodation of Disabled Visitors at Historic Sites in the National Park System*, 1983.)

c. Safety and Security

Structures, their contents, and the people in and near them can be protected by a combination of use management, facilities management, and protective systems. When existing or proposed uses of structures present safety or security problems, and when solutions to such problems would unacceptably compromise their historical integrity or character, the uses should be changed or limited to eliminate or minimize the conflicts.

Passive techniques and proactive management strategies are employed wherever possible to minimize damage or loss. Particularly for Category Ia and Ib structures, installation of security, fire detection, and passive fire suppression systems is encouraged if they will not significantly impair the resource value of the structures. Other modifications, including changes to facilitate emergency egress, should be considered only when they are the only viable options and will not significantly impair the historical integrity or character of structures.

Plans for treatment of historic and prehistoric structures should also address treatment of associated hazardous materials, including lead, asbestos, and underground fuel tanks. All work involving these hazards should be undertaken in ways that will minimize loss of historic material and character. (For additional information see the *Loss Control Management Guideline* [NPS-50] and other applicable directives.)

d. Energy Conservation

Historic structures should be managed to minimize energy use, but modifications to improve energy efficiency are acceptable only if they will not adversely affect the structures' historical integrity or character. Any proposed action that would alter the temperature, relative humidity, light, or air quality in a historic structure must be evaluated to determine its potential effect on the structure and any museum objects or archival materials therein. Such actions include installation of insulation, vapor barriers, and storm windows, and changes in energy sources.

5. Administrative Issues

Plans for treatment and use of historic and prehistoric structures should be reviewed during their preparation to ensure compliance with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the additional standards in this guideline. Once approved, the plans should be used to program funds and staff time necessary for their implementation.

a. Compliance

All project plans for historic and prehistoric structures must be reviewed for compliance with Section 106 of the National Historic Preservation Act. Proposed treatment involving prehistoric and some historic structures may also require consultation with Native Americans or other associated ethnic groups. In planning undertakings involving historic structures, it is important to consider possible effects on archeological resources, cultural landscapes, museum objects, and ethnographic resources as well.

b. Funding and Staffing

Every treatment project, including preservation, is initiated by a programming document containing cost estimates and a scope of work. This information should be drawn from the Inventory and Condition Assessment Program (ICAP) or an approved HSR.

All research, planning, and treatment involving historic structures must be done by qualified persons. Staffing requirements for park cultural resource specialists should be included in the resources management plan for each park. Cooperative projects and temporary details of specialists from parks, support offices, and centers are encouraged to maximize use of existing skills and knowledge within the NPS.

c. Construction Documents

Working drawings and specifications for treatment of historic and prehistoric structures are prepared under the direction of a historical architect consistent with the *Drafting for Design and Construction Guideline*. In addition, construction documents will meet the following standards:

- Existing conditions are clearly documented if they are not included in an HSR or ICAP report. Provisions are made for a detailed photographic or graphic record of the treatment process.
- All aspects of the proposed treatment are consistent with the *Secretary of the Interior's Standards for the Treatment of Historic Properties* and the additional standards and other provisions in this guideline. Specific attention is given to use of materials, craftsmanship, design, installation of new systems, and structural reinforcement.
- Provisions are made for protection of all cultural and natural resources at the construction site. Significant material to be retained *in situ* is identified and methods of identification for new materials are prescribed.
- Specifications include procedures to be followed if structural problems are encountered or new features or resources are found.
- Specifications include special skills required of contractors and craftspersons.

D. Stewardship

For historic structures, stewardship focuses on five major activities: (a) control of treatment and use, (b) monitoring conditions of deterioration and structural failure, (c) protecting structures from human and environmental threats, (d) retaining or delegating responsibility for structures, and (e) developing the skills, knowledge, and attitudes needed to support the program. The last of these is addressed in Chapter 4 as part of training. Guidance for the others follows.

1. Treatment and Use

Treatment and use of historic structures follows the conditions outlined in approved planning documents such as the general management plan, historic structure report, and ICAP work procedures.

Treatment of historic structures is divided into four categories: preservation, rehabilitation, restoration, and reconstruction. These categories parallel those used in planning for the ultimate treatment of historic structures. They are also the same as those outlined in *Management Policies* and the *Secretary of the Interior's Standards for the Treatment of Historic Properties*, commonly referred to as the Secretary's Standards.

One treatment category, preservation, encompasses four activities recognized in the 1995 Servicewide Programmatic Agreement (PA): stabilization, housekeeping, routine maintenance, and cyclic maintenance. Under stipulation IV of the PA these activities are referred to collectively as "preservation maintenance." (See Chapter 5 for additional information.)

The following standards apply to all treatments:

- Use is monitored and regulated to minimize both immediate and long-term damage.
- Use of destructive techniques, such as archeological excavation, is limited to providing sufficient information for research, interpretation, and management needs.
- All work that may affect resources is evaluated by an historical architect and other professionals, as appropriate.
- All modification, repair, or replacement of materials and features is preceded by sufficient study and recording to protect research and interpretive values.
- New work, materials, and replacement features are identified, documented, or permanently marked in an unobtrusive manner to distinguish them from original work, materials, and features. The manner and location of identification is recorded using the Inventory and Condition Assessment Program (ICAP).
- A proposed treatment project is initiated by the appropriate programming document, including a scope of work and cost estimate from an HSR or ICAP. Such projects include preservation maintenance as well as major treatment. No treatment is undertaken without an approved HSR or work procedure documenting the work, and Section 106 compliance.
- A treatment project is directed by a historical architect and performed by qualified technicians.
- Representative features salvaged from a historic structure are accessioned and cataloged, provided that they fall within the park's scope of collection statement.
- All changes made during treatment are graphically documented with drawings and photographs. Records of treatment are managed as archival materials by a curator or archivist within the park's museum collection.

a. Preservation

Preservation maintains the existing integrity and character of a historic structure by arresting or retarding deterioration caused by natural forces and normal use. It includes both maintenance and stabilization. Maintenance is a systematic activity mitigating wear and deterioration of a structure by protecting its condition. Stabilization involves reestablishing the stability of an unsafe, damaged, or deteriorating structure

while maintaining its existing character. The following standards based on the *Secretary of the Interior's Standards for the Treatment of Historic Properties* apply:

- A historic structure is used as it was historically, or is given a new or adaptive use that maximizes the retention of historic materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a structure is protected and, if necessary, stabilized until additional work may be undertaken. Adaptive use of prehistoric structures is prohibited.
- The historic character of a historic structure is retained and preserved. The replacement or removal of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a structure is avoided.
- Each historic structure is recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve historic materials and features is physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
- Changes to a historic structure that have acquired historical significance in their own right are retained and preserved.
- Historic materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a historic structure are preserved.
- The existing condition of historic features is evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a historic feature, the new work matches the old in design, color, texture, and where possible, materials. Repair or replacement of features is substantiated by archeological, documentary, or physical evidence.
- Chemical or physical treatments that cause damage to historic materials are not used.
- Archeological and landscape resources are protected and preserved in place. If such resources must be disturbed, mitigation measures are undertaken including recovery, curation, and documentation.

The following additional standards apply:

- Stabilization detracts as little as possible from a historic structure's appearance and significance. Reinforcement is concealed wherever possible so as not to intrude upon or detract from the aesthetic, historical, or archeological quality of the structure, except where concealment would result in the alteration or destruction of historically or archeologically significant features, materials, or physical or visual relationships. Accurate documentation of stabilization procedures is kept and made available for future needs.
- Maintenance is executed by qualified technicians in accordance with approved work procedures. Where such procedures are nonexistent or incomplete, a historical architect provides technical guidance.
- All features of a historic structure are inspected on a scheduled basis and information about their condition is entered into ICAP.

b. Rehabilitation

Rehabilitation improves the utility or function of a historic structure, through repair or alteration, to make possible a compatible contemporary use while preserving those portions or features that are important in defining its significance. Leased historic structures rehabilitated consistent with the *Secretary of the Interior's Standards for Rehabilitation* may be eligible for preservation tax credits. The following standards based on the Secretary's Standards apply:

- A historic structure is used as it was historically or is given a new or adaptive use that maximizes the retention of historic materials, features, spaces, and spatial relationships. Adaptive use of prehistoric structures is prohibited.
- The historic character of a historic structure is retained and preserved. The replacement or removal of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a structure is avoided.

- Each historic structure is recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features from other structures, are not undertaken. Work needed to stabilize, consolidate, and conserve historic materials and features is physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
- Changes to a historic structure that have acquired historical significance in their own right are retained and preserved.
- Historic materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a historic structure are preserved.
- Deteriorated historic features are repaired rather than replaced. Where the severity of deterioration requires repair or replacement of a historic feature, the new feature matches the old in design, color, texture, and, where possible, materials. Repair or replacement of missing features is substantiated by archeological, documentary, or physical evidence.
- Chemical or physical treatments that cause damage to historic materials are not used.
- Archeological and landscape resources are protected and preserved in place. If such resources must be disturbed, mitigation measures are undertaken including recovery, curation, and documentation.
- Additions, alterations, or related new construction do not destroy historic materials, features, and spatial relationships that characterize the historic structure. New work is differentiated from the old and is compatible with the historic materials, features, size, scale and proportion, and massing of the structure.
- Additions and adjacent or related new construction are undertaken in such a manner that if removed in the future, the essential form and integrity of the historic structure would be unimpaired.

c. Restoration

Restoration accurately presents the form, features, and character of a historic structure as it appeared at a specific period. It may involve the replication of missing historic features and removal of later features, some having cultural value in themselves. The following standards based on the *Secretary of the Interior's Standards for the Treatment of Historic Properties* apply:

- A historic structure is used as it was historically or given a new or adaptive use that interprets the structure and its restoration period. Adaptive use of prehistoric structures is prohibited.
- Materials and features from the restoration period are retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period is not undertaken.
- Each historic structure is recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features from other structures, are not undertaken. Work needed to stabilize, consolidate, and conserve materials and features from the restoration period is physically and visually compatible, identifiable upon close inspection, and properly documented for future research.
- Materials, features, finishes, spaces, and spatial relationships that characterize other historic periods are documented prior to their alteration or removal.
- Historic materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period are preserved.
- Deteriorated features from the restoration period are repaired rather than replaced. Where the severity of deterioration requires replacement of a historic feature, the new feature matches the old in design, color, texture and, where possible, materials.
- Replacement of missing features from the restoration period is substantiated by archeological, documentary, or physical evidence. A false sense of history is not created by adding conjectural features or features from other structures, or by combining features that never existed together historically.
- Chemical or physical treatments that cause damage to historic materials are not used.

- Archeological and landscape resources are protected and preserved in place. If such resources must be disturbed, mitigation measures are undertaken including recovery, curation, and documentation.
- Designs that were never executed historically are not constructed.

The following additional standards apply:

- Archeological, documentary, or physical evidence is sufficient to permit accurate restoration with minimal conjecture.
- Restoration is essential to public understanding of the cultural associations of a park.
- Reinforcements required for stability of existing support systems and protective or code-required features (HVAC, electrical, security, fire protection, handicapped accessibility, etc.) are concealed whenever possible so as not to intrude upon or detract from a historic structure's aesthetic and historical qualities, except where concealment would result in the alteration or destruction of historically significant features, materials, or physical or visual relationships.

d. Reconstruction

Reconstruction entails reproducing the form, features, and character of a non-surviving historic structure, or any part thereof, as it appeared at a specific time and place. Reconstruction of an entire structure is always a last-resort measure for addressing a management objective and will be undertaken only upon specific written approval of the director after policy review in the Washington office. The following standards based on the *Secretary of the Interior's Standards for the Treatment of Historic Properties* apply:

- Archeological, documentary, or physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to public understanding of the cultural associations of a park established for that purpose.
- Reconstruction of a historic structure in its historic location is preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. Mitigation measures are undertaken including recovery, curation, and documentation.
- Reconstruction includes measures to preserve any remaining historic material, features, and spatial relationships.
- Reconstruction is based on the accurate duplication of historic features substantiated by archeological, documentary, or physical evidence, rather than on conjectural designs or the availability of different features from other structures. A reconstructed historic structure re-creates the appearance of the non-surviving structure in design, color, texture, and, where possible, materials.
- A reconstruction is clearly identified as a contemporary re-creation.
- Designs that were never executed historically are not constructed.

The following additional standards apply:

- The reconstructed historic structure is full-scale and on the original site.
- The reconstruction does not simulate a damaged or ruined historic structure or constitute a general representation of a "typical" structure.

2. Monitoring and Inspections

Planning for maintenance of historic structures requires information about the nature and condition of their features. These data are collected on a systematic basis using the procedures outlined in the Inventory and Condition Assessment Program (ICAP). Major components of ICAP include the scheduled and major assessments modules that upload information into the Maintenance Management (MM) program to generate work requests. ICAP work procedures are contained in the Historic Property Preservation

Database (HPPD) and are compatible with the MM program. ICAP interfaces electronically with the List of Classified Structures (LCS) and the Cultural Resources Management Bibliography (CRBIB).

As an integrated database with a growing capacity to coordinate information between maintenance and resource management, ICAP should be promptly implemented in all parks. All major assessments of historic structures should be based on ICAP, and reports of work done to historic structures should be recorded in ICAP.

(For additional information see the ICAP *Reference Manual* and *Computer User Manual*.)

3. Protection

Special attention must be paid to protection of historic structures from threats caused by use and environmental forces. Such threats include vandalism, smoking, storage of flammable materials and explosives, and vehicular and airplane traffic. Solutions include road patrols, restrictions on smoking and storage of flammables (as required in certain cases by *Management Policies*), proper collection and disposal of trash, housekeeping, routine and cyclic maintenance, installation of fire detection and suppression systems, limitations on or removal of traffic, and periodic inspections.

4. Partnerships

Not all historic structures in parks are or can be managed directly by the NPS. Several alternatives are available and deserve consideration, particularly when treatment or use cannot be supported by the NPS.

a. Leasing

Leasing historic property under Section 111 of the National Historic Preservation Act (P.L. 96-515) provides both resource protection and revenue that may be used to defray costs associated with either a specific leased property or any other National Register property under NPS jurisdiction. As prescribed in *Management Policies*, a lease must ensure preservation of the property and must not unduly limit its appreciation by the public, interfere with visitor use and enjoyment of the park, or preclude use of the property for other management purposes judged more appropriate or cost-effective. The regulations governing leasing of historic properties under this authority are contained in 36 CFR 18. (For further information see Director's Order 27, "Historic Property Leases and Exchanges.")

Except within national parks, national monuments of scientific significance, and properties that were always federally owned, leasing of real property including historic property can also be undertaken under P.L. 90-401 and 36 CFR 17 in situations where resource protection would be enhanced. However, the rental income cannot be retained.

b. Special Use Permits

Special use permits allow use of historic structures for short periods. They can be canceled at any time. They should not be used as substitutes for leases under P.L. 96-515 or P.L. 90-401.

c. Cooperative Agreements

Under P.L. 104-208, the NPS may "enter into cooperative agreements that involve the transfer of National Park Service appropriated funds to State, local, and tribal governments, other public entities, educational institutions, and private nonprofit organizations for the public purpose of carrying out National Park Service programs." On the premise that resource preservation is a park program in support of a public purpose, this authority has been interpreted to mean that the NPS can allow the mentioned entities to rehabilitate and use park historic structures.

d. Concession Agreements

The Concession Management Act (P.L. 89-249) authorizes the secretary of the interior to contract for accommodations, facilities, and services necessary for public use and park enjoyment. Such agreements can permit concessioner use of historic structures.

Concessioner-occupied historic structures in which the NPS has a legally enforceable property interest will be managed in accordance with Chapter 5 of *Management Policies* and with all applicable standards in this guideline. Specific standards for concessioner-managed historic structures follow:

- All historic structures are inventoried, evaluated, and nominated to the National Register.
- Additions or alterations to historic structures and new facilities adjacent to them are contextually compatible.
- A structure's interior finishes, features, and fixtures are evaluated and managed in accordance with their contribution to its significance.
- NPS-owned furnishings are evaluated for both integrity and associations and if consistent with the park's scope of collection statement are managed as museum objects.
- Concession agreements include provisions outlining responsibility for preservation maintenance and rehabilitation as well as research, planning, and other appropriate treatments.
- Fire suppression and security systems required for public and structural safety are designed to be as unobtrusive as possible and are located to minimize adverse effects on the historic structure while meeting applicable codes.
- Additions and alterations for accessibility are designed and located to be as unobtrusive as possible and to minimize adverse effects on the historic structure while meeting applicable regulations.

All proposals for concession projects that might affect historic structures, whether initiated by concessioners or the NPS, will be submitted to cultural resource specialists and concessions management specialists for review.

e. Conveyance

Except within national parks, national monuments of scientific significance, and properties that were always federally owned, Public Law 90-401 of July 15, 1968, allows the conveyance of a freehold interest in park real property, including historic property, with appropriate easements in situations where resource protection would be enhanced. (See 36 CFR 17.)

CHECKLIST FOR MANAGEMENT OF HISTORIC AND PREHISTORIC STRUCTURES

RESEARCH:

- All structures eligible for the National Register of Historic Places have been identified and nominated.
- All historic structures are in the List of Classified Structures and entries are complete and current.
- Documentary research and physical examination are sufficient to support treatment.
- Work procedures and major assessments are complete in an ICAP format.
- All historic structures have been recorded to levels commensurate with their significance and mandated purposes.
- Material samples, field notes, photographs, and construction files composing the resource information base are properly organized and placed in the park museum collection.
- All professional reports and publications are entered in the Cultural Resources Management Bibliography.

PLANNING:

- All historic structures are appropriately addressed in the park's general management plan, development concept plan(s), and interpretive prospectus with respect to their significance, purposes or uses, and research bases.

- Plans and specifications for all preservation, rehabilitation, restoration, and reconstruction work are prepared by a historical architect.
- Work assignments for preservation maintenance are assigned priority based on the relative significance of assets and the relative seriousness of their condition.
- Required consultation and legal compliance is carried out before any work is initiated, and the concerns of consultants are taken into account in decision-making.

STEWARDSHIP:

- All work is done by qualified people in conformance with approved plans and specifications or work procedures.
- All historic structures are inspected at least annually in an ICAP format.
- All maintenance personnel who work in, on, or around historic structures are given appropriate training.
- The entire park staff is made aware of the significance of all historic structures and the major threats to them.
- All ground disturbance around historic structures is cleared or monitored by an archeologist.

CHAPTER 9: MANAGEMENT OF MUSEUM OBJECTS

A. Introduction and Objectives

Museum collections (objects, specimens, and archival and manuscript collections) are important park resources as well as being valuable for the information they provide about processes, events, and interactions among people and the environment. Natural and cultural objects and their associated records provide baseline data, serving as scientific and historical documentation of the park's resources and purpose. All resource management records that are directly associated with museum objects are managed as museum property. These and other resource management records are preserved as part of the archival and manuscript collection because they document and provide an information base for the continuing management of the park's resources. Museum objects used in exhibits, furnished historic structures, and other interpretive programs help visitors gain better understanding of the events, activities, and people commemorated by parks.

Although museum objects are sometimes perceived as entities separate from other park resources, they are, in fact, inextricably interwoven. Archeological assemblages recovered *in situ* remain resources after their excavation, while their associated records document their relationship to the site. At Dinosaur National Monument paleontological quarry maps graphically preserve irreplaceable information about the relationships between individual fossil bones, the relationships among specimens, and the three-dimensional orientation of the bones. Such maps are essential in the preparation and interpretation of fossil bones collected at a site and in research on them. Historic furnishings within their related structures preserve the resource as a whole. The integrity of the Old House at Adams National Historic Site, for example, would be severely compromised without its contents. To separate one kind of resource from another diminishes both. Management decisions that may directly or indirectly impact museum collections must take these relationships into account.

Note: "Object" as used in this chapter has a different meaning from its use as a historic property category of the National Register of Historic Places. This chapter is concerned with "prehistoric and historic objects, artifacts, works of art, archival documents, and natural history specimens that are part of museum collections. Elements, fragments, and components of structures are objects if they are no longer a part of the original structure" (410 DM 114-60.100(n)). "Objects" in the National Register are relatively small structures (e.g., boundary markers, fountains, sculpture, statuary) generally fixed in place. Museum objects are normally not listed in the National Register except as contributing elements of historic buildings or districts. (See National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation*, for more on the Register's object category.)

Note: The National Archives and Records Administration (NARA) and the *Records Management Guideline* (NPS-19) refer to NPS official records as "records" and non-official records as "non-records." Because the term "record" is commonly defined more broadly to include "information fixed in a tangible form," this guidance describes federal government records managed under NARA standards as "official" and records not subject to NARA authority as "non-official."

1. Types of Museum Collections

Cultural collections contain materials pertinent to such disciplines as archeology, ethnography, and history. Archeological collections are based on materials systematically acquired within a park as a result of a research project or a park management need. They include artifacts, specimens, and associated records. (Refer to 36 CFR Part 79, "Curation of Federally-Owned and Administered Archeological Collections," Section 4, for a detailed definition of archeological collections and associated records.) Ethnographic collections consist of objects associated with contemporary cultures and the records that document their collection and study. Most NPS ethnographic collections are from Native American, Polynesian, or Micronesian peoples who have occupied an area within a park or who have some other present or past park association. Historical collections encompass diverse materials made or used by cultures with a written tradition up to the present time. Historic objects relate to the people, activities, and events associated with a park's mission, themes, and history. These include archival, electronic, audiovisual, and textual paper records.

Natural history collections contain biological, geological, paleontological, and environmental specimens and associated records such as collection inventories; computer documentation and data; conservation treatment records; field catalogs; field notes; lists, maps, and drawings; photographic negatives, prints, and slides; manuscripts; reports; and resource identification documentation. Biological collections (flora and fauna) help establish resource baselines by demonstrating what species were present in parks at particular times. They can aid in identifying environmental changes and their causes and provide information needed to restore cultural landscapes. Geological collections support the study of processes that have formed the land. Paleontological collections preserve fossil plants and animals or their traces to assist the study of past life. Environmental samples are collected and preserved to study the presence and effect of toxic compounds on park ecosystems.

(The NPS *Museum Handbook*, Part I, Museum Collections, Chapter 1, discusses cultural and natural history collections. The *Natural Resources Management Guideline* [NPS-77], Chapter 5, "Collections," provides definitions and a discussion of natural history collections.)

Museum archival and manuscript collections (non-official records) include all types of documentary records that contribute substantially to the understanding, interpretation, and management of other park resources (cultural and natural) as well as being important resources in their own right. These non-official records are managed as part of the museum collection. These collections are arranged and described according to the standards stated in the *Museum Handbook*, Part II, Museum Records, Appendix D.

Museum archival and manuscript collections are divided into five non—mutually exclusive categories: personal papers, organizational archives (acquired archives), assembled manuscript collections, resource management records (including associated records), and sub-official records (copies and duplicates). (The figure on the following page diagrams the categories of documentary records.)

Personal papers are records that have been created or accumulated by an individual or a family. Personal papers that are associated with the history of a park (e.g., with a park's founders, formative staff, or eminent associated individuals) may be acquired for the museum collection.

Organizational archives are organic collections created by an organization as a routine part of doing business, such as correspondence and fiscal and personnel records. A park may acquire organizational records that are related to or associated with its mission or history before its establishment (e.g., the Edison Archives at Edison National Historic Site).

Assembled collections are accumulations of documents such as manuscripts assembled by a collector and are generally unrelated by provenance. Documents in these collections usually are on a single topic, in a single format, or associated with a single individual. Assembled collections are also called special or manuscript collections.

Resource management records include documentation made or acquired by a park to record information on cultural and natural resources. Resource management records are the documentary products of archeological surveys and excavations, natural resource surveys, historic structure and cultural landscape research, scientific projects, and various natural and cultural resource maintenance projects. These records document park resources and serve as information bases for their continuing management. Resource management records include but are not limited to artifact and specimen inventories; computer disks, tapes, and other electronic media; drawings; field notes; films; laboratory reports; maps; manuscripts; oral histories; printouts of computerized data; photographic negatives, prints, and slides; reports; and audio and video tapes.

	Documentary Records	
Museum Archival & Manuscript Collections See NPS Museum Handbook		**Official Records** See NPS-19 Records Management Guidelines
Personal	**Organizational Archives** (Acquired Archives)	**Assembled Manuscript Collections**
	Resource Management Records	**Sub-Official Records**
		Inactive Records Transfer to Federal Records Center/NARA see NPS-19 [DO-19]
		Active Records Managed by NPS, see NPS-19 [DO-19]
	Associated Records	**Museum Records**

Museum Records

Resource management records may or may not be directly related to museum objects (artifacts or specimens). For example, an object obtained from an archeological excavation relates directly to the records of the excavation. If associated with other museum objects, these documents are also known as "associated records."

Associated records are a subset of resource management records essential for the control and use of related museum objects. They include all documentation generated by the activity of collecting and analyzing artifacts, specimens, or other resources that are (or subsequently may be) designated as part of a park's museum collection. Examples include but are not limited to analytical study data; artifact or specimen inventories; computer documentation and data; conservation treatment records; daily journals; drawings; field notes; manuscripts; maps; photographic negatives, prints, and slides; and reports generated by archeological and scientific investigations. All associated records must be managed as part of the museum collection. See also the definition in 36 CFR Part 79.

Sub-official records are those non-official files of copies or duplicate documents (e.g., carbon copies, copies of internal policies and procedures, desk files, reports, or subject files of individuals or offices) that are useful for reference, administrative histories, interpretation, research, and other informational purposes.

Most park museum archival and manuscript collections (with a few exceptions) are not official records as defined by the National Archives and Records Administration (44 USC 3301), since they are made or acquired for reference or exhibition. The following discussion provides guidance for determining the status of records.

Resource management records are the park's key reference resources on cultural and natural resources, and associated records are the park's key reference resources on cultural and natural history museum collections that contain baseline park information used on a regular basis. Resource management records are non-official records created for reference and are cataloged into the museum property system. Some resource management records were created in response to specific federal requirements (e.g., government audits or inquiries) rather than reference. These records are sent to the federal records centers as prescribed in the *Records Management Guideline*.

Sub-official records are not considered necessary for permanent retention by the National Archives and Records Administration because NARA only retains original records. Personal papers and organizational archives are acquired as they relate directly to a park's history and are necessary for reference or exhibition for purposes of interpretation, management, and history. Assembled collections of topical or special format materials are also created and acquired for reference purposes.

Records created for purposes other than reference or exhibition, such as budget, contracting, and personnel records and central correspondence files, are considered official records. After official records are judged non-current, they must be disposed of in accordance with the records schedule provided in the *Records Management Guideline*. When there is uncertainty about a collection's category, the support office curator and the records manager should be contacted for guidance.

On occasion it is unclear to park staff whether records belong in park libraries or in park museum archival and manuscript collections. If an item is an external (non—Interior Department) publication, such as a book or journal published by a university press, that is not rare or from the park's historic period, it belongs in the library collection. If the item is an original or unpublished (i.e., visual or audiovisual material, document, manuscript, report, or other archival document type), or if it is rare or from the park's historic period, it belongs in the museum archival and manuscript collections. Sub-official records (i.e., files of duplicates or copies including documents and reports) are not part of park library collections as they are not true external publications, but rather are unpublished documents. They should be included in the museum collection.

2. Library Materials

In general, books and serials that are not rare and other published reference materials that are housed in park, center, and office libraries are managed according to *National Park Service Library Program* (Special Directive 94-1) and the *Library Management Guideline* (NPS-84), and not as part of the museum collection. Books and other library materials used in exhibits or as furnishings in historic structures, retained for their physical properties or their associative value, or considered rare are always managed as part of the museum collection. These materials also may be cross-referenced to other research resources including museum archive and library finding aids (indices and card catalogs).

The Information and Telecommunications Center, NPS Headquarters Office, is responsible for ensuring "that libraries and other information resources are coordinated and integrated so as to effectively satisfy service wide needs and priorities" (145 DM 103.D). This activity is conducted as part of the Information Resources Management Review program as mandated by the Department of the Interior and the General Services Administration (44 USC 3506(c)(8)).

3. Program Objectives

Park managers are responsible for ensuring that needed research and documentation (e.g., accessioning and cataloging) are conducted on and for the museum objects in their custody, that the objects are adequately considered in planning, and that they are given appropriate stewardship.

Research is conducted to ensure the appropriateness of a collection, to validate the sources and authenticity of objects, to analyze objects for proper preservation, storage and conservation treatment, to determine suitable furnishings for historic structures, and to include objects in interpreting a park's mission.

Planning for museum objects focuses on how objects should be stored, exhibited, and used to best serve their preservation, understanding, and use.

Stewardship of museum objects entails ensuring that objects are protected against theft, fire, floods, and other threats; implementing a preservation program that emphasizes preventive conservation; and performing cyclic monitoring to identify and ensure correction of deficiencies in protection, preservation, and documentation.

B. Research

1. Scope of Collections

Park superintendents, by delegation, represent the director and the secretary of the interior in accepting title to and responsibility for managing park museum collections. NPS policy permits and encourages the acquisition of museum objects by gift, purchase, exchange, transfer, field collection, and loan under the authorities of the Antiquities Act of 1906, the National Park Service Act of 1916, the Historic Sites Act of 1935, the Management of Museum Properties Act of 1955, and the Archaeological Resources Protection Act of 1979, as amended.

As specified in the NPS *Management Policies*, the proper content of a park's museum collection must be defined in an approved scope of collection statement (SOCS). A SOCS is a stand-alone document. It states the significance of the collection and sets limits on it based on the park's purpose and interpretive objectives as enunciated in legislation, other mandates, and park-specific planning documents. The SOCS is prepared at the park, reviewed by appropriate park and support office staff, and approved by the park superintendent. A park lacking a museum collection and not intending to acquire museum objects must submit a brief SOCS to that effect. The SOCS must be reviewed periodically and revised whenever changed conditions clearly alter a park's mission. (See the *Museum Handbook*, Part I, Chapter 2, for guidance in writing and implementing a SOCS and Part II, Appendix D, for guidance on preparing a documentation strategy statement for archival and manuscript collections.)

2. Acquisition

Service policy is to accept only unrestricted gifts and bequests. Parks must ensure that owners of potential museum objects have valid title before transfer of ownership. Parks will consult with affected Native American groups if a proposed acquisition involves human remains and associated funerary objects, unassociated funerary objects, sacred objects, or objects of cultural patrimony. Parks that acquire objects and archival and manuscript collections (including photographic materials and sound recordings) or works of art by gift, purchase, or exchange need to determine who owns the copyrights and where possible secure their transfer to the NPS. (For guidance on acquisition procedures and copyright, see the *Museum Handbook*, Part I, Chapter 2, and Part II, Chapter 2 and Appendix D.) They may also request release forms for photographs, motion pictures, and videotapes (model release forms) and oral history audio tapes (interview release forms).

All objects and archival and manuscript collections considered for acquisition (including collections created or assembled by NPS staff) must be evaluated against the park's approved SOCS. In most cases, archival and manuscript collections are acquired or assembled by a park if they are found useful for reference, exhibition, or resource management. Park staff should avoid skimming records from existing file groups (and thus destroying their integrity) to create assembled collections for reference, unless it is known that the file group is to be destroyed. It is preferable to assemble duplicate materials (sub-official collections) or, in the case of non-official records, to acquire and maintain the entire collection. Staff should be guided by the *Records Management Guideline*, curators, NPS archivists, and park records managers in these matters.

3. Documentation

Documentation establishing federal ownership and custody of museum objects is required. Documentation facilitates physical and intellectual access to museum objects for purposes of collection management, research, interpretation, exhibit, and loan.

a. Accessioning

The first step in documentation is accessioning, to be completed upon receipt of objects. Accessioning establishes legal ownership and custody (temporary or permanent) and records basic information about an object or group of objects. Each accession transaction is recorded in a bound accession book, which is treated as a legal document. Accessioning also requires the maintenance of a file containing all pertinent documentation about the acquisition of objects (e.g., deeds of gift, collecting permits, receipt of property forms, related correspondence). The accession book and accession file are permanent park records not subject to disposition.

b. Cataloging

The second step in documentation is cataloging, which should be completed soon after the receipt of objects. Cataloging involves gathering and recording information observable from the objects themselves, associated documentation, and research. It is the primary property and location record of museum objects. The museum catalog record provides accountability for and physical and intellectual access to museum objects. Data on each museum object are entered into the NPS Automated National Catalog System (ANCS) or its successor. Electronic copies of the Museum Catalog Record (Form 10-254 or 10-254B) are submitted to the National Catalog.

All paper museum records (e.g., accession book, accession file, catalog records) are kept in a locking, insulated file. Magnetic media (e.g., disks, tapes) that back up ANCS data files and other collection data files are stored in an appropriately rated container (e.g., media safe, media file, mixed media file, media box).

Archival and manuscript collections require additional work, such as surveying, arrangement, and description (finding aid production) beyond basic cataloging. For detailed guidance on managing archival and manuscript collections, see the *Museum Handbook*, Part II, Appendix D.

For detailed guidance in accessioning and cataloging, see the *Museum Handbook*, Part II. For use of ANCS, see the NPS *ANCS User Manual*.

4. Research Use of Collections

Under the authority of the park superintendent or center chief, qualified institutions and individuals may conduct research in a museum collection upon written request. The request must include a research proposal detailing the purpose, methods, and expected results of the research. The researcher must agree to abide by the park's rules regarding access to and use of the collection. A copy of any report or publication resulting from a research project must be filed with the park or center. (For guidance on research use of natural history collections, see the *Natural Resources Management Guideline* [NPS-77], Chapter 5, "Collections.")

Although museum collections should not be used in a consumptive manner, destructive analysis may be undertaken for officially sanctioned research purposes. When the impact is minor (e.g., taking a thread from the tacking surface of a painting for analysis, removing a strand of hair from a mammal specimen for determining the presence of arsenic) or when the object is common (e.g., a potsherd used in a petrographic analysis), approval at the park level is required. When the object is rare or significant, destructive analysis must be justified in writing for review and approval by the regional director.

Park and center archival and manuscript collections will be open to researchers based on written access and use procedures. Researchers must be informed of any restrictions on access to particular collections and of the laws relating to copyright and fair use of collection materials.

5. Interpretive Uses of Collections

Museum collections offer vast possibilities for the use of original materials subject to NPS preservation and protection standards. Exhibits, furnished rooms, and interpretive and educational programs are traditional means of making museum collections available for public education and enjoyment. Motion pictures and photography, World Wide Web and other Internet postings, publications, and reproductions of original materials can extend the benefit of collections to wider audiences and provide indirect access to otherwise generally inaccessible objects. (The *Museum Handbook*, Part III [draft in progress], will provide guidance on uses of museum collections.)

6. Outgoing Loans

Parks may make outgoing loans of museum objects for purposes of exhibition, exhibit preparation, research, conservation, photography, curation, and storage. Standard outgoing loans may be made to nonprofit educational or cultural institutions (e.g., museums, historical societies, and universities) and to organizations providing services (e.g., conservation treatment and exhibit preparation). Outgoing loans also may be made to NPS repositories or to non-NPS repositories (museums and universities) for curation and

storage of museum collections. Loans will not be made to individuals. (The *Museum Handbook*, Part II, Chapter 5, provides specific guidance on procedures for documenting outgoing loans.)

7. Deaccessioning

Under the authority granted by the Museum Properties Act of 1955, parks may deaccession museum collections through transfers to other NPS units and exchanges. (The *Museum Handbook*, Part II, Chapter 6, provides guidance on deaccessioning.)

Standards

- Each park has an approved stand-alone scope of collection statement defining the purpose and prescribing the limits and use of its museum collection.
- Every museum object is accessioned as soon as it is in NPS custody and cataloged promptly thereafter. Paper museum records and ANCS magnetic media are kept in secure, fire-resistant storage.
- All materials resulting from systematic research projects associated with an accession are housed at the same repository, except when on temporary loan for specific use elsewhere. Within that repository, objects and records composing an accession may be stored or filed separately from related objects and records to the extent required for security, fire protection, enhanced or reduced access, preservation, fiscal control, or exhibition.
- Each park has consulted with affected Native Americans on any acquisitions that involve human remains and associated funerary objects, unassociated funerary objects, sacred objects, or objects of cultural patrimony.
- Archival and manuscript collections are surveyed, appraised, accessioned, cataloged, rehoused, arranged, and described according to procedures and guidelines contained in the *Museum Handbook*, Part II, Appendix D.
- Archival and manuscript collections are arranged and described by or under the guidance of an archivist in accordance with professional standards and procedures. A preliminary finding aid is produced as described in the *Museum Handbook*, Part II, Appendix D.
- Museum objects not relevant to a park according to its scope of collection statement are deaccessioned as permitted by current NPS procedures.
- Archeological objects and natural history specimens systematically collected within a park are deaccessioned only if lost or so deteriorated that they no longer have any scientific value.
- Objects and archival and manuscript collections in a park's museum collection are made available to qualified researchers who can demonstrate a need to use them. Access is permitted under conditions designed to ensure the security and preservation of the materials, including adequate staff supervision. Copyright is respected in accordance with guidance in the *Museum Handbook*, Part I, Chapter 2, and Part II, Chapter 2 and Appendix D.
- Each outgoing loan is documented by an outgoing loan agreement. All loaned museum objects are cataloged unless loaned to NPS repositories for collections management and storage purposes. Conditions for preserving, handling, and shipping and an itemized list of museum objects are included in a loan agreement.

C. Planning

1. Park Planning

To ensure that a park's museum collection is properly documented, protected, preserved, and used, its management requirements need to be considered in the park's planning process. Museum collections management should be addressed in the park's statement for management, outline of planning requirements, general management plan, development concept plan(s), resources management plan, and interpretive prospectus. (For guidance on including collection management issues in park plans see the *Museum Handbook*, Part I, Chapter 1.)

Archeological and scientific research projects in the park must include planning and funding for the curation of collected objects, specimens, and associated records. (For guidance see Director's Order 26, "Projects Must Fund Basic Preservation of Museum Collections They Generate."

2. Collection Management Planning

a. Collection Management Plan

A collection management plan (CMP) provides short-term and long-term guidance to park and center staffs in the management and care of museum objects and archival and manuscript collections. Every park with a museum collection should have a CMP. All archival and manuscript collections should be surveyed and a collection-level survey description written before or during the CMP, as described in the *Museum Handbook*, Part II, Appendix D. Parks with small collections may require only a brief plan while parks with large, complex collections may require a more extensive plan. CMPs are prepared by teams of NPS curators or by contractors and are approved by the park superintendent. (For detailed guidance see the *Museum Handbook*, Part I, Chapter 3.)

Once a CMP is approved, the park prepares a corrective action plan that is based on its recommendations. The action plan identifies the corrective actions to be taken, specifies priorities and target dates for completion, identifies responsible persons, lists needed resources (e.g., funds, staff, supplies), and indicates any necessary advance steps (e.g., submitting programming documents to identify needed funding).

b. Collection Storage Plan

A collection storage plan (CSP) is a stand-alone document that guides collection storage at a park or center. A CSP may be prepared to solve one or more problems in an existing storage facility, to guide renovation of an existing space into a storage facility, or to guide design of a new storage facility. When appropriate, a recently prepared CSP may be included as part of a CMP, which always addresses museum collections storage needs. In some instances, the museum collections storage chapter of a CMP may recommend the subsequent preparation of a detailed CSP, although a CMP's storage chapter is usually sufficient for park planning and development purposes. (For detailed guidance, see the *Museum Handbook*, Part I, Chapter 7.)

c. Collection Condition Survey

A collection condition survey (CCS) is a planning tool rather than a specific plan. Conducted by a professional conservator, it reports the condition of all or part of a museum collection. It creates a baseline reference for future assessment of object deterioration and identifies objects in need of conservation treatment by degree of urgency. It is not to be used as a technical basis for conservation treatment of individual objects. Because of the wide variety of materials (e.g., paper, textiles, wood, metals, ceramics), a park may need more than one CCS. (For detailed guidance, see the *Museum Handbook*, Part I, Chapter 3, and Part II, Appendix D.)

d. Exhibit Plan and Design

An exhibit plan and design (EPD) serve as a guide for the development of exhibits that support the interpretive themes of a park. The final production-ready exhibit plan identifies the museum objects and graphics to be exhibited and provides label text. Detailed design drawings provide specifications on environmental and security needs for objects, special mounts needed to support objects, and techniques in exhibit case construction that facilitate access to museum objects. Park curatorial staff and regional curators must be included in the development and review of EDPs. Native Americans associated with archeological and ethnographic objects will be consulted about their use in exhibits. (The NPS *Museum Handbook*, Part III [draft in progress] provides guidance on the exhibit plan and design.)

e. Historic Furnishings Report

A historic furnishings report (HFR) provides a history of a structure's use and documents the type and placement of furnishings to a period of interpretive significance. If a decision is made to furnish a historic structure, a detailed plan section lists each recommended item. The HFR provides guidance for the care

and maintenance of furnishings that are exhibited in the structure, including specific instructions for the care of newly acquired objects. This information can be incorporated by the park in its preventive conservation program. The HFR also recommends appropriate levels of historic housekeeping for interpretation. (The NPS *Museum Handbook*, Part III [draft in progress] provides guidance on the HFR.)

f. Relationship to Historic Structures

In managing museum objects, it is important to understand the nature and significance of the structure housing them and the problems that their presence may create. Using a historic structure to house or exhibit museum objects may necessitate modifications to the structure for environmental control and protective systems. Such modifications may impose more wear on the structure than resulted from its original use.

Planning must consider the nature, condition, and preservation needs of both the museum objects and the structure and the effects of the proposed use on each. Alternatives to maintaining the objects in the historic structure should be considered. Proposals for environmental control systems will be based on data from an ongoing environmental monitoring program. A historic structure report is required when envisioned modifications could affect the integrity of the structure.

g. Submissions to Cultural Resources Management Bibliography (CRBIB)

Parks must provide the CRBIB cluster coordinator approved copies of scope of collection statements, collection management plans, museum sections of emergency operation plans, collection condition surveys, collection storage plans, and historic furnishings reports. (See Appendix D.)

Standards

- Plans for park management, development, exhibits, interpretation, and research address the proper documentation, protection, preservation, and use of objects.
- Each park and center has a collection management plan to guide proper management and care of its museum collection and a separate collection storage plan if necessary.
- Each park and center has one or more collection condition surveys to detect problems with the condition of museum objects and determine conservation treatment priorities.
- Proposals for environmental control measures in historic structures are based on data from environmental monitoring for at least one year.
- Each park ensures that the cataloging and curation of objects, specimens, and associated records recovered from archeological and scientific projects are accomplished.
- Each park ensures that approved museum plans and reports are entered in the CRBIB.

D. Stewardship

1. Protection of Museum Objects

Museum objects may be threatened by fire, theft, vandalism, natural disasters, and careless acts. A systematic approach to protecting them entails identifying and evaluating threats and risks; conducting and reconciling annual inventories of collections; developing and implementing good operational procedures and practices (e.g., key control, access control, opening and closing procedures); evaluating the physical security of spaces housing collections (with attention to barriers, cases, locks, doors, and windows); installing intrusion detection systems and fire detection and suppression systems appropriate to the nature of collections and the structures housing them; incorporating the special needs of collections in physical security plans, structural fire plans, and emergency operations plans; and ensuring that all incidents involving collections are reported. Emergency operations plans should identify and give protection and recovery priority to the most significant objects in collections. (For guidance on security, fire protection, and emergency planning for museum collections see the *Museum Handbook*, Part I, Chapters 9 and 10. In addition, *Floodplain Management Guideline* [Special Directive 93-4] provides guidance regarding floodplains and the housing of museum collections.)

2. Preservation of Museum Objects

The preservation of museum objects is an *ongoing process* of preventive conservation, supplemented by conservation treatment when necessary. The primary goal is to preserve objects in as stable a condition as possible.

a. Preventive Conservation

The first level of museum object preservation is preventive conservation. A preventive conservation program focuses on non-interventive actions that can be taken to prevent damage to and minimize deterioration of museum objects. Such actions include monitoring, recording, and controlling environmental agents (e.g., light, relative humidity, temperature, dust, and gaseous pollution); inspecting and recording the condition of museum objects; establishing an integrated pest management program in all spaces that house museum objects; practicing proper techniques and methods in handling, research use, reformatting, documentation, storage, exhibit, housekeeping, and packing and shipping of museum objects; and ensuring that needed information and procedures relevant to museum objects are incorporated in the park's emergency operations plan. The effectiveness of a park's ongoing program for the care and maintenance of museum objects is based on identifying specific tasks and appropriate procedures for their accomplishment, establishing schedules and costs, and coordinating staff responsibilities. An ongoing preventive conservation program is the most effective means of preserving museum objects and will minimize the need for conservation treatments. (For guidance on preventive conservation, see the *Museum Handbook*, Part I, Chapters 3 through 7, Chapter 13 [draft in progress], and Appendixes I through P, and Part II, Appendix D.)

b. Conservation Treatment

Conservation treatment employs methods and techniques that are usually interventive in varying degrees to preserve the condition or appearance of a museum object. The two broad categories of conservation treatments are stabilization and restoration. *Stabilization treatments* are applied to museum objects to increase their stability or durability when preventive conservation actions are insufficient to reduce the rate of deterioration or when deterioration has rendered them so fragile as to be in danger under any circumstances. *Restoration treatments* may be required when museum objects are placed on exhibit or are needed for research purposes. Restoration is an attempt to bring museum objects closer to their original or other previous appearance by removing additions not considered historically important, replacing missing parts, renewing finishes, and/or concealing damage. As prescribed in the NPS *Management Policies*, "intervention will be minimized to reduce the possibility of compromising the object's integrity." Conservation treatments are performed by conservators following the Code of Ethics and Standards of Practice of the American Institute for Conservation of Historic and Artistic Works. To initiate conservation treatment services, a park must prepare and submit an Object Treatment Request (Form 10-252). (For detailed guidance on the standards and procedures for object conservation treatment, see the *Museum Handbook*, Part I, Chapter 8 and Appendix D.)

3. Accounting for Museum Objects

a. Annual Physical Inventory

In accordance with NPS property regulations, each park will conduct an annual inventory of museum property. This requires (1) a 100 percent inventory of all controlled museum property (all objects valued at $1,000 or more, all firearms, all objects accessioned as incoming loans, and all objects especially vulnerable to theft, loss, or damage), (2) a random sample inventory of all cataloged museum property, and (3) an inventory of uncatalogued museum property by a random sample of accessions. (For instructions, see the *Museum Handbook*, Part II, Chapter 4, and the *ANCS User Manual*, Appendix M.)

b. Collections Management Report

The Collections Management Report (Form 10-94) provides important information about the status (e.g., documentation, preservation, and use) of each park's and center's museum collection. It is completed and submitted by the park superintendent or center manager at the end of each fiscal year. The reports identify deficiencies that need to be addressed and help justify staffing and funding requests for museum collections

management. The Museum Management Program uses the data received from the parks and regions to prepare an annual Service-wide report. (For instructions, see the *Museum Handbook*, Part II, Chapter 4.)

c. Assessment of Conditions

Director's Order 24, "Standards for NPS Museum Collections Management," requires that every park use the *Checklist for Preservation and Protection of Museum Collections* to assess conditions against NPS standards and requirements for museum collections storage, exhibits, museum environment, security, fire protection, housekeeping, and museum collections planning. This self-assessment is completed every four years and forwarded to the Museum Management Program. (See the *Museum Handbook*, Part I, Appendix F, and the *ANCS User Manual*, Appendix O.) Archival collections also require a processing plan statement (see the *Museum Handbook*, Part II, Appendix D).

4. Consumptive Use of Museum Objects

A primary consideration in all uses of museum objects is the preservation of each object and the collection as a whole. Use that may damage or hasten the deterioration of objects should be undertaken only after careful review and approval.

Controlled use of museum objects is authorized as long as they are not subjected to unacceptable possibilities of wear, breakage, theft, or deterioration. The following points highlight the requirements and considerations when using museum objects.

(a) NPS programs using museum objects benefit the public by fostering an understanding and appreciation of the values of cultural and natural heritage.

(b) The museum collection is used in a beneficial and, as applicable, non-consumptive manner.

(c) Destructive analysis is a legitimate use of museum collections for approved research purposes when the impact is minor or when the object is common, in which case approval by the superintendent is required. If an object is rare or significant, a request for destructive analysis should be reviewed by the support office staff curator and may be approved only by the regional director, as elaborated below.

(d) In cases where use of a museum object would expose it to unacceptable wear, deterioration, destruction, or the possibility of breakage, loss, or theft, an accurate reproduction must be used, if appropriate. The regional director may exempt individual objects from this requirement if the park superintendent has submitted a justification statement demonstrating (1) that the program in which the object is to be used is for the benefit of the public and will enhance understanding and appreciation of cultural or natural heritage or contribute significantly to heritage preservation or protection, and (2) that reproductions of the original or a similar object will not accomplish the intended purpose. The statement must contain the following:

1. Description of the program and proposed use of the object.
2. Description of the object to be used and a copy of its catalog card.
3. Explanation of how the activity is essential to park management needs.
4. Discussion of alternatives that could achieve the same or a similar purpose.
5. Explanation of why it is not feasible to use reproductions of the exact museum object or similar objects.
6. Measures proposed to mitigate the loss or damage that might occur. (For example, a carriage or wagon approved for use in parades could be included in a park's cyclic maintenance program.)
7. Discussion of how the park will, if necessary, explain to the public why the NPS is using museum objects in a potentially consumptive manner.

(e) The regional director will grant no exemption for use that might lead to loss or deterioration of museum objects that are directly connected with or prime survivors from the park's historic periods, events, or personalities; or are type specimens or one-of-a-kind natural history specimens; or are from systematic archeological collections, have known archeological site provenance, or have scientific value that has not

been extracted and documented; or remain of scientific interest. The justification statement must certify that the objects requested for exemption do not meet the above criteria. If this certification cannot be provided, an exemption may be granted only by the director.

(f) No exemption will be granted for use of museum objects where such use may lead to loss or destruction of human remains, associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act, unless such use is approved by the affiliated cultural group in addition to the regional director or director as described in (d) and (e). *Management Polices* (7:5) specifically prohibits exhibition of skeletal or mummified human remains or photos or replicas of them.

(g) An exemption may be granted for scientific analysis that will damage, deteriorate, or destroy all or portions of any museum object, except natural history type specimens, if that analysis is based on a professional research design that clearly documents the scientific need for the use of such techniques.

(h) Reproductions used in place of original museum objects must be indelibly marked as such if retained in the museum. They are managed and accounted for as required in the *Museum Handbook*, Part II, Chapters 3 and 4.

(i) The requirement to request an exemption for use of original objects applies only to objects that are in NPS ownership. In granting permits to outside groups (e.g., Civil War reenactors) who will be using other original or reproduction objects on park premises, the superintendent must be satisfied that such use is consistent with the resource preservation and interpretive values of the park.

Black Powder Storage, Handling and Transportation Standards apply to all uses of firearms in the park, whether by NPS personnel or outside groups and whether objects are in NPS or other custody. NPS personnel will use only reproduction weapons in firing demonstrations. No waivers for use of original museum firearms will be granted.

5. Historic Furnishings

Historic furnishings are groups of objects (such as furniture, paintings, other decorative and utilitarian objects, books, wall and floor coverings) assembled according to a documented report that recreate historic interior spaces. In some cases, one furnished room may be more evocative of an event or person than an entire furnished structure. In other cases, effective interpretation may require the furnishing of multiple structures, both commercial and residential. In every case, furnishing must be as accurate as possible and must directly serve park interpretive objectives. The following general criteria apply:

(a) Original furnishings present in their original arrangement will not be moved or replaced unless required for their protection or preservation, or unless the structure is designated for another use in an approved park plan. Before movement or replacement, the furnishings and their arrangement must be fully documented.

(b) A structure may be refurnished, in whole or part, if it is significantly related to a primary park theme, if refurnishing is determined to be the best way to interpret that theme to the public, and if there is sufficient evidence of the design and placement of the original furnishings to refurnish with minimal conjecture.

(c) To ensure accurate recreations of historic furnishings, reproductions will be based on existing prototypes.

6. Staffing and Funding

A park with a museum collection should assign responsibility for its day-to-day management to a staff member. This responsibility should be identified in the person's position description and critical elements of performance standards. Curatorial staff must adhere to the Code of Ethics for Curators adopted by the American Association of Museums. Archival staff and curatorial staff responsible for archival and manuscript collections must adhere to the Code of Ethics for Archivists adopted by the Society of American Archivists. (For guidance see the *Museum Handbook*, Part I, Chapter 1 and Appendix C.)

Funding for a park's curatorial program can come from Park Operations, the Cultural Resources Preservation Fund, Cultural Resources Cyclic Maintenance, the Exhibit Repair and Rehabilitation Program, and other sources. The program should have an adequate base. (For guidance see the *Museum Handbook*, Part I, Chapters 1 and 12.)

Standards

- Each park and center has identified threats to the security and protection of its museum collection and has taken appropriate measures to deal with them, including emergency planning.
- Each park and center has implemented a preventive conservation program whereby museum objects are exhibited, handled, and stored with sensitivity to their specific environmental needs and vulnerabilities and are regularly inspected for evidence of deterioration.
- Preservation and use of museum objects accords with Director's Order 24, "Standards for NPS Museum Collections Management"; the *Museum Handbook*, Part I; and National Archives and Records Administration standards.
- Conservation treatment required to stabilize or restore museum objects entails the least intervention necessary to satisfy treatment goals.
- Inventories of museum objects and status reports on collections are completed and submitted in accordance with current NPS museum property procedures and other administrative requirements.
- Any use of museum objects likely to damage them or hasten their deterioration is undertaken only after careful review and approval.

CHECKLIST FOR MANAGEMENT OF MUSEUM OBJECTS

RESEARCH:

- A scope of collection statement is prepared, approved, and implemented.
- Affected Native Americans are consulted regarding each acquisition that involves Native American human remains, associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony.
- All objects are accessioned and cataloged. Archival and manuscript collections are surveyed, appraised, accessioned, cataloged, rehoused, arranged, and described, and finding aids are produced.
- Furnishings in historic structures are documented in a historic furnishings report.

PLANNING:

- Park plans address the management of museum collections and prescribe needed corrective measures.
- Research and development projects include plans and funds for the curation of collected objects and specimens.
- A collection management plan, including an archival processing plan and documentation strategy statement, is prepared, approved, and implemented.
- Planning for the exhibit or storage of objects in historic structures considers the preservation requirements of both objects and structures.

STEWARDSHIP:

- Threats to the park's museum collection are identified, dealt with through appropriate security and protective measures, and addressed in structural fire and emergency operations plans.
- A preventive conservation program is developed and implemented.
- The annual physical inventory is completed and submitted according to established procedures.

- Consumptive use of objects receives prior approval as prescribed.
- Objects housed in repositories/institutions outside the park are preserved, protected, and documented according to NPS standards and procedures.
- The checklist for preservation and protection of museum collections is completed every four years and correction of deficiencies is programmed and updated as needed.
- The collection management report is completed annually, according to instructions.

CHAPTER 10: MANAGEMENT OF ETHNOGRAPHIC RESOURCES

A. Overview and Introduction

This chapter is about people and the ethnographic resources, or traditional park sites, structures, objects, landscapes and natural resources, they define as significant to their present way of life.

1. The Park Applied Ethnography Program

Attention to the peoples whose lifeways are traditionally associated with resources under National Park Service stewardship is mandated in legislation and NPS policies. According to the 1988 *Management Policies* (5:11):

Certain contemporary native American and other communities are permitted by law, regulation, or policy to pursue customary religious, subsistence, and other cultural uses of park resources with which they are traditionally associated. Such continuing use is often essential to the survival of family, community, or regional cultural systems, including patterns of belief and economic and religious life. Recognizing that its resource protection mandate affects this human use and cultural context of park resources, the National Park Service will plan and execute programs in ways that safeguard cultural and natural resources while reflecting informed concern for the contemporary peoples and cultures traditionally associated with them.

Ethnography, part of cultural anthropology, is concerned with the peoples associated with parks, with their cultural systems or ways of life, and with the related technology, sites, structures, other material features, and natural resources. In addition to traditional regimes for resource use, for example, and family and community economic and social features, cultural systems include expressive elements that celebrate or record significant events and may carry considerable symbolic and emotional weight. These include rituals, sacred narratives such as origin myths, verbal arts including folk tales, and performing and graphic arts. Cultural anthropologists refer to behavioral, value, and expressive patterns, and technology, as features of cultural systems. Preservation specialists may use the term "intangible" to refer to behavior, values, and expressive culture.

Developing programs, policies, guidelines, and data to help management identify and protect culturally significant resources falls to the applied ethnography program. A major goal is to facilitate collaborative relationships between the NPS and the peoples whose customary ways of life affect, and are affected by, park resource management. Seeking practical outcomes, the program identifies issues that concern management, communities, and the resources they both value and provides information to promote mutually acceptable solutions. It cooperates with other programs and with the publics associated with parks to help reduce tensions and close gaps between NPS and community goals.

2. Need for Ethnographic Technical Assistance and Data

Ethnographic assistance is required when particular communities, tribes, or groups, and their ways of life, are known or thought to have traditional links to park resources and any of the following are anticipated:

a) Preparing special resource studies or general management, land protection, resources management, interpretive, or other plans requiring information about and consultation with potentially involved people.
b) Formulating legislative proposals, policies, and guidelines affecting communities and neighborhoods associated with proposed, new or existing parks.
c) Studying, consulting on, planning for, and monitoring traditional resource uses and assessing effects of park programs on them.
d) Inventorying and reaching treatment decisions about traditional resources.
e) Planning or implementing subsistence programs, ecosystems management approaches, and natural resource programs including biological diversity inventorying and monitoring, global climate change, and Man and the Biosphere.
f) Consulting about and determining lineal descent or cultural affiliations between past and contemporary Native Americans and their associations to park resources, including park collections.

3. Traditionally Associated Groups and Resource Uses

Emphasis is on resources significant to non-recreational users: park neighbors, traditional residents, and former residents who remain attached to the area despite having relocated. People with loved ones buried or commemorated at NPS memorials represent another unique user group. They all represent a special client population with long-term stakes in the integrity of park resources and the outcomes of management decisions that affect resources associated with them.

Traditional users generally differ as a group from recreational visitors. Although they may value park units, such as the Washington Monument, that symbolize U.S. nationhood, a shared identity, and nationally significant processes, events, and people, the groups associated with particular parks typically assign significance to places closely linked with their own sense of purpose, existence as a community, and development as ethnically distinctive peoples. These places may support subsistence or ceremonial activities or represent birthplaces of significant individuals or group origin sites. They may be migration routes marking, for example, the Native American diaspora or northward sanctuary and freedom trails of 19th-century African Americans. Traditional user groups are likely to be Alaskan natives including Inupiat, Yupik and Dena'ina peoples, American Indians in the contiguous 48 states, and Pacific Island peoples such as Hawaiians, as identified in the *Management Policies* (8:9). They could be diverse white ethnic groups such as those associated with Cape Cod, African Americans at Jean Lafitte, Asian Americans at Manzanar, and Hispanic Americans at Tumacacori. American Indian people are highlighted because of their governmental relationship to the federal government, a point made by the Constitution, treaties, legislation, a significant body of case law, Department of the Interior trust responsibilities (which also affect certain Pacific islands) and regulations, and *Management Policies* (chapters 2, 4, 5, 6, 7, 8, 10).

For policy purposes, "Native American" refers to American Indian tribes recognized by the federal and state governments, certain unrecognized tribes, Alaska Native entities, and Native Hawaiians and other Native Pacific Islanders of the U.S. trust territories. The definition is inclusive for purposes of consultation with groups whose interests are affected by NPS decisions. Native Hawaiians and some American Indian groups are not recognized by or eligible to receive services from the Bureau of Indian Affairs. Still, they define themselves and are known to others as groups who historically shared linguistic, kinship, political, and other distinguishing cultural features. They are considered consultative partners when they have traditional associations with park resources.

Some "unrecognized" tribes are petitioning the Bureau of Indian Affairs for recognition. Ethnographers and American Indian liaisons in support offices can help parks track the progress of petitions.

To be considered traditional, associations to park resources will usually have endured at least two generations. Native Americans often have much longer ties to resources and view them as uniquely their cultural patrimony. In these cases they might express their strong sense of spiritual guardianship over the resources and interest in participating in related planning, management, and interpretive decisions. Park responses to these interests, and those of other associated communities such as former residents of Cades Cove, should include establishing and maintaining regular consultations, "friends" committees, and formal cooperative arrangements through memorandums of understanding.

Identifying groups with traditional associations to park resources occurs in several ways. Identification might start when park staff observe or infer certain uses. Prime examples are the hunting and fishing activities of Alaska's Dena'ina Athabascan peoples. Hispanic worshipers use San Antonio Missions and white Arkansas families live at Buffalo River. African Americans live in sight of the Martin Luther King, Jr., National Historic Site, and relatives and friends of deceased veterans leave mementos of their grief at the Vietnam Veterans Memorial. Other traditional uses are not always apparent to cultural outsiders or casual observers but might be inferred from evidence, such as ceremonial offerings left at Haleakala.

Less visible uses occur off-site as people recount oral traditions highlighting park resources with central roles in traditional beliefs, history, and practices. Heritage lessons for the young are embedded in narratives anchored to park localities. Euro-Americans memorialize Ellis Island in legends of cultural passages from the old world to the new and recall the abrupt exchange of old identities and names for startlingly new "personas." Devils Tower or, as many prefer, "Bear Lodge," figures prominently in Northern Plains Indian origin accounts. Traditional oral narratives, and place names, offer additional contexts for understanding the resources and their contributions to a people's cultural identity. Consulting with associated groups to identify the resources and preferred treatments is important.

4. Traditional Ethnographic Cultural and Natural Resources

Ethnographic resources are variations of natural resources and standard cultural resource types. They are subsistence and ceremonial locales and sites, structures, objects, and rural and urban landscapes assigned cultural significance by traditional users. The decision to call resources "ethnographic" depends on whether associated peoples perceive them as traditionally meaningful to their identity as a group and the survival of their lifeways. Some such resources may be designated by other terms and cross-listed in other NPS inventories. Sites defined as archeological for preservation purposes, for example, are ethnographic if traditional religious practitioners consider them significant sources of spiritual power. Members of associated groups may also ascribe meaning to properties in park collections perceived as sacred or as items of cultural identity and heritage. Groups also assign their own cultural meanings to natural landscapes and localities.

The traditional management distinction between natural and cultural resources may be inapplicable where ethnographic resources are concerned. When natural resources acquire meaning according to the different cultural constructs of a particular group, they become ethnographic and thus cultural resources as well. This makes it important for NPS specialists to consult associated groups about the heritage significance of natural resources in activities and beliefs related to, for example, religion, healing, and subsistence. In addition, plants inventoried for natural resource purposes are also often culturally categorized by local peoples according to traditional systems of knowledge about plants and animals (ethnobiology). Recording and analyzing this knowledge can reveal unanticipated information on local ecology. Some peoples' religious beliefs also require quarrying certain minerals or collecting certain plants in specific places for sacred or medicinal purposes; just any minerals or plants found elsewhere will not do, even if geologically or botanically identical. Sensitivity is important to culturally defined use of natural resources.

Sufficient data will be developed to identify the culturally specific uses of cultural and natural resources, track the effects of use on the resource base, and assess effects of park resource management on traditional ways of life. In Alaskan parks, traditional use studies will be conducted in cooperation with rural Alaskans for subsistence information, pursuant to Title VIII, Section 812 of the Alaska National Interest Lands Conservation Act (ANILCA), and for other parks where traditional consumptive use is permitted by legislation, treaties, regulation, or policy (see *Management Policies* 8:10). Where traditional users regard limited plant collection as crucial for certain religious or curing activities, and no threatened or endangered species are affected or wildlife disrupted, managers are encouraged to cooperate with concerned communities to develop systems for controlled gathering.

The cultural use of natural resources for subsistence is studied as part of a complex system that includes related features such as the environment, population size, technology, and family life and civic duties. In acknowledging the cultural context for subsistence, studies address qualitative social, cultural and other system aspects, not just quantifiable variables such as harvest size and frequency. Backyard gardens or infrequent plant gathering for religious ceremonial or medicinal needs will be documented within the broader cultural context as well.

(For more information see the *Natural Resources Management Guideline* (NPS-77), Chapters 2, 3, 4.)

a. Identifying Ethnographic Resource Boundaries

The physical boundaries of ethnographic resources will be documented, although they may not always match the visible fixed boundaries of other cultural resource types or natural features. Sacred resources can have spiritual impacts that extend beyond their obvious physical limits so that, in effect, they generate "spiritual activity fields." For example, traditional Native American practitioners perceive significance not just in particular trees where eagles roosted on auspicious occasions, but in the surrounding landscape as well. Hispanic worshipers at colonial missions may symbolically acknowledge the role of the chapel by making culturally appropriate signs before arriving at its entrance.

Other ceremonial resources, such as Native American spirit trails or vision quest sites and sacred spaces in general, may be too elusive for cultural outsiders to perceive or too private for believers to discuss. These situations, and practitioners' views on resource treatment and protection, will be addressed through systematic consultation and collaborative ethnographic studies of traditional use. Identifying spiritual activity fields in specific localities and adequately protecting their outer boundaries might not always be feasible, but an essential first step is collaboration with associated groups to determine boundaries and preferred treatments.

b. Ethnographic Resource Types

Some ethnographic dimensions of standard preservation categories and environmental features follow:

Sites: Archeological or historic places assigned significance by traditionally associated people as locales, for example, of their physical, cultural, or spiritual origins.

Structures: Built features that associated peoples accord importance as, for example, places of ethnic or national conversion (Ellis Island), spiritually powerful residences (Mesa Verde), family homesteads (Buffalo River), and religious and social centers (African Meeting House).

Objects: Portable materials that curators classify as archeologic, historic, ethnologic, or natural but traditionally associated people classify as ceremonial materials, diaries, spiritual entities, adornment, and other categories of ethnic heritage. Objects made for domestic use or trade are included.

Landscapes: Areas containing diverse natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements such as that at Martin Luther King, Jr., National Historic Site, New Orleans neighborhoods, the Timbisha Shoshone community at Death Valley, and massive geological structures such as Devils Tower. Small plant communities, animals, and subsistence and ceremonial grounds are included. Historic sites and designed and vernacular landscapes may have ethnographic significance.

5. Ethnography's Interdisciplinary Role

The program contributes uniquely to diverse cultural and natural resource programs and activities as follows:

Archeology: Ethnography supports archeological permitting, repatriation, and consultation activities by providing information on contemporary groups with traditional interests in prehistoric and historic archeological resources and data on cultural affiliations between past and present groups and object classes.

Curation: Ethnography offers data on cultural affiliations between past and present groups and objects in NPS collections, the significance assigned to objects by contemporary peoples, repatriation, and culturally appropriate treatment of objects and approaches to groups associated with them.

Cultural landscapes: Ethnography addresses landscape resources and the traditionally associated groups who develop their own interpretations, names, and preferred uses for them. It makes the perspectives and knowledge of traditional resource users accessible to NPS managers.

History: Ethnography approaches oral history, ethnohistory, and other studies of the past by highlighting local processes of change and stability within larger contexts. Working with community members and analyzing documents, ethnography presents the past not only as reconstructed by cultural outsiders but as interpreted by involved communities.

Historic Structures: Ethnography contributes perspectives on the use, manufacture, and organization of structures, including insights into relationships between family and community organization and the use of private and public space.

Planning: Ethnography provides perspectives on people and cultural systems affected by proposed or existing parks. It contributes to culturally appropriate consultation strategies and evaluates consultation results to identify sensitive issues. (See *Management Policies* 2:5, 6, 9.)

Natural resources programs: Ethnographic data on the traditional use and management of culturally important natural resources helps inform ecosystem management, programs of consumptive use, Man and the Biosphere, and global climate change about relationships between environmental issues and local resource uses. (See *Management Policies* 4:1, 2.)

Interpretation: Ethnography provides data on groups with traditional resource associations and their views of resource use and appropriate public programs. (See *Management Policies* 7:5.)

Ranger activities: Ethnography provides perspectives on traditional resource uses that contribute to the culturally informed formulation and implementation of policies and regulations on park use. (See *Management Policies* 8:8, 9, 10.)

International affairs: Ethnography provides cross-cultural expertise for programs that plan for the protection and management of resources associated with indigenous or other small-scale communities.

B. Research

1. Principles of Ethnographic Research

a. Collaboration

The collaborative and open character of park ethnography must be continually stressed to ensure that communities whose heritage resources and associated lifeways are being studied understand and participate in the studies as early and in as many ways as possible. Community knowledge and support contributes to the research findings, while participation helps communities better understand anthropological concerns and NPS goals.

Concurrence in study goals and permission to proceed will be obtained before conducting a study; written permission will be sought from tribal councils. Even studies that primarily review published or unpublished materials include brief interviews and consultations, thus requiring community support. Draft reports will be circulated so that affected groups can suggest mid-course corrections.

Collaboration may take the form of paid research partnerships for community members or co-authorships of reports where community members have contributed substantially to a study. Local contributions to a report will be explicitly recognized.

Researchers are expected to establish cooperative relationships with park management, staff, and involved planning teams to incorporate their expertise and enhance the practical value of their reports.

b. Research Conduct, Confidentiality, and Information Management

Management Policies (5:12, 13) recognizes the need to keep confidential the location, character, and cultural context of certain ethnographic resources, especially historic and archeological resources with sacred significance. Data on them are exempted from public disclosure consistent with Section 304 of the National Historic Preservation Act and Section 9(a) of the Archaeological Resources Protection Act. NPS policies also require protecting community members by keeping their identities confidential to the extent permitted by law.

Details on sensitive religious resources will be deleted or protected in all cultural resource reports going to the National Technical Information Service or the public. Locational information on sensitive resources will be deleted or protected in ethnographic studies, the Ethnographic Resources Inventory, and planning documents, and locations of sacred sites will be deleted from public maps, brochures, and other interpretive materials when warranted. The need for confidentiality of sensitive data will be indicated on National Register of Historic Places forms.

NPS ethnographers and contractors will subscribe to the principles of conduct developed by the American Anthropological Association and the Society For Applied Anthropology. Each NPS contract and research agreement will include provisions on confidentiality, contractor-community relationships, and contractor-NPS relationships. Contractors, for example, may retain raw field data and summarize them for the NPS, provided that future NPS questions on that data are answered without additional cost.

Contractors will protect the identity of community cultural experts by using pseudonyms unless experts specify otherwise in writing. They are responsible for holding the list of consultants and pseudonyms confidential. They will review their draft research designs and reports with the affected communities and revise the drafts as appropriate. No information about sensitive resources will be made public by a contractor without explicit permission from the NPS and the community or tribe.

Summaries of field notes, oral history tapes, videotapes, photographs, etc., that are turned over to the NPS by researchers are managed as parts of the parks' museum collections, with appropriate restrictions on public viewing of confidential materials.

Standards

- Principal investigators are applied cultural anthropologists with the Ph.D. or comparable research experience and a record of applied experience and high professional standing in the anthropological community.
- Community cultural experts or consultants are involved as research cooperators, credited for their contributions, and appropriately compensated.
- Provisions for confidentiality are implemented.
- Affected communities review and approve draft research reports.
- Appropriate NPS staff are briefed on research results and provisions for confidentiality.
- Research results are shared with the community and published.
- Studies identify resources for inclusion in the Ethnographic Resources Inventory, for nomination to the National Register of Historic Places, and for interpretation as appropriate.

2. Methodologies

Ethnographic research methods must be technically credible and responsive to specific cultural dimensions, such as language needs. Researchers with special language competencies, in addition to experience in the geographic area and with particular peoples and methodologies, may receive priority in the competition for contracts. Ethnographers will prepare research designs, task directives, and scopes of work and identify the range of appropriate methods in consultation with park managers. Consultations about the proposed research will occur with groups whose resources and resource uses are the subjects of study. Contract researchers will refine the methodologies when research is contracted out or executed under cooperative agreements.

Applied ethnographers use diverse methods such as analysis of archival and published documents and historic photographs, census taking, individual and group interviews, oral and life histories, subsistence mapping to chart changes in subsistence areas over time, cognitive analyses, site visits, participant observation, surveys, focus groups, decision charting, place name analysis, and genealogical charting. Videotaping is increasingly used to record subsistence activities or to document natural and cultural resources for viewing by elders who cannot travel to the park. Contract ethnographers must also be experts in developing and testing appropriate sets of questions, evaluating community consultants, cross-checking documentary, observational, and oral evidence, analyzing data, and preparing reports.

3. Ethnographic Research Types

Management Policies (5:12) states: "To ensure that NPS plans and actions reflect contemporary knowledge about the cultural context of . . . ethnographic resources, the National Park Service will conduct appropriate cultural anthropological research in cooperation with park-associated groups." The following standard research types meet this need.

a. Ethnographic Overview and Assessment

This initial comprehensive background study of types, uses, and users of ethnographic resources reviews existing information and identifies new data needs. It will be programmed and conducted when park resources are known or thought to be traditionally associated with a contemporary group or groups. The overview reviews and summarizes existing ethnographic data for people and resources associated with parks; the assessment evaluates them and identifies data gaps. Information is derived primarily from existing archival and published materials and is supplemented with ethnographic interviewing of knowledgeable community consultants.

b. Traditional Use Study

Describing and analyzing traditional resource use and management regimes, this field study will be conducted and periodically updated for all parks having traditional resource users. It fills the data gaps identified by the ethnographic overview and assessment and satisfies requirements of ANILCA, specific legislation for parks in the contiguous 48 states, and global climate change and Man in the Biosphere programs for information on customary uses of cultural and natural resources. Its benefits include the baseline information needed to inform interpretive programs, monitor effects of use on renewable and non-renewable resources, reach culturally informed decisions about appropriate kinds of protection, and assess effects of restricted use on traditional users. Subsistence studies require at least one year of documentary review and intensive fieldwork in collaboration with members of the involved communities, facility with local languages, residence in the community, ethnographic interviewing, and participant observation. (See the *Natural Resources Management Guideline*, Chapters 2, 3, 4.)

c. Rapid Ethnographic Assessment Project (REAP)

REAP, a project-driven study and battery of methods including focus groups, transect walks, and community mapping, will be conducted to acquire and analyze data for planning and program evaluation decisions. It serves a manager's need to solicit community views about alternative courses of actions and to choose among alternatives in order to satisfy National Environmental Policy Act (NEPA) consultation and information requirements about effects of potential and/or planned actions on the human environment. REAP can assist in conducting social impact assessments. Work should be completed in four or fewer months, but these need not be consecutive. REAP does not substitute for the more detailed ethnographic overview and assessment or traditional use studies and may indicate the need for more prolonged work.

d. Ethnographic Landscape Study

This is a limited field survey to identify and describe the names, locations, distributions, and meanings of ethnographic landscape features. It can be combined with traditional use studies or conducted as part of other cultural landscape studies. It follows or may be combined with the ethnographic overview and assessment when gaps in the available data base indicate the need for detailed data on park ethnographic resources. Community members will be involved in site visits and ethnographic interviewing. Studies will be coordinated with the cultural landscape program, which has primary responsibility for cultural landscape identification and management.

e. Cultural Affiliation and Lineal Descent Studies

The affiliation study establishes relationships between park resources and associated past and present peoples. Lineal descent studies trace relationships between objects in park collections, or other resources, and descendants of individuals whose remains or objects are in park collections. They are required to address the cultural affiliation and consultation requirements of the Native American Graves Protection and

Repatriation Act (NAGPRA) and other legislation, policy, and regulations that address peoples traditionally associated with park resources. Parks with Native American collections and the potential for the excavation or inadvertent discovery of Native American materials will program affiliation studies as soon as possible. Researchers will consult with NPS archeologists, curators, ethnographers, and other professionals concerned with repatriation, as well as with community members.

f. Ethnohistory

Ethnohistory–a methodology for obtaining culture-specific descriptions and conducting analyses within a historical framework–addresses dynamic relationships between parks and traditionally associated groups. The objective is to consider a people's lifeways through time so that continuities and change in land use patterns, family organization, demography, ceremonial life, and other features can be plotted in time and in variable contexts such as changing neighbors, frontiers, or economic, social, and political climates. An ethnohistory can be combined with an overview and assessment or traditional use study.

g. Ethnographic Oral and Life Histories

These are standard anthropological methods for studying development, change, and stability in human life cycles, lifeways, and the resources that support them. They involve prolonged collaboration between interviewer and interviewee, or consultant. It is imperative to initiate them as soon as possible when elderly community consultants are involved because crucial information about the community and resident lifeways is threatened daily as older residents recall their former circumstances with less clarity and changing social and economic conditions lead to new ways of life. These histories can be combined with traditional use studies and ethnohistories.

4. Ethnographic Resources Inventory (ERI)

Using data collected through ethnographic studies and consultations, each park will develop and maintain a management listing of cultural and natural features accorded significance by traditionally associated peoples. This listing will identify user groups, resource locales, and conditions; the forms and periods of use; boundaries, preferred treatments, and confidentiality concerns. It will aid in meeting legislative, regulatory, and policy requirements for identifying ethnographic resources and associated groups; in forecasting consultation needs and budgets; in notifying interested groups about anticipated planning activities; in developing appropriate public involvement strategies; and in identifying resources that require monitoring.

No exhaustive list or description is anticipated. There will be data gaps partly reflecting reluctance by associated groups to reveal information that might jeopardize the privacy and effectiveness of religious or subsistence activities or threaten burial sites. Confidentiality of data will be ensured.

Until Service-wide data categories and other inventory components are designed and tested, in consultation with traditional user groups, park management should record even casual observations of traditional resource uses.

C. Planning and Program Strategies

1. Park Ethnographic Program Strategy

The ethnographic program is a data file and set of action plans or strategies for identifying traditionally associated peoples and ethnographic resources and monitoring traditional use activities and park development to ensure that incompatible activities do not adversely affect either park resources or traditional activities. Established by each park with traditionally associated groups, the strategy also tracks consultations and progress on ethnographic studies and maintains updated information for incorporation into planning documents. The program file includes:

a) lists of legislative constraints on and opportunities for consumptive, ceremonial, and other traditional resource uses.

b) lists of traditionally associated groups and more recent user groups and a schedule of anticipated planning or other actions requiring consultation;

c) a consulting plan with recommended techniques for gaining the effective involvement of park-associated groups in planning, operations, studies, and NAGPRA compliance. The plan should consider appropriate language (if community members do not prefer English), meeting places and times, names or titles and addresses of relevant contact people, and issues and programs in which the groups should be involved;

d) consultation records that inform present and successive staff of discussions and their participants, issues and resolutions, and need for follow-up. This file will include copies of notification letters;

e) a NAGPRA implementation plan that describes steps and schedule for identifying affiliated groups and conducting consultations;

f) a traditional community resource management plan, prepared in collaboration with affected communities, reflecting their concerns about ceremonial, consumptive, and other access to and use of specific ethnographic resources, and treatment preferences for significant cultural and natural resources. Legislative constraints on use, permissible harvesting and other uses, resource monitoring arrangements, and NPS concurrence with community objectives should be noted. This information will be included in resources management plans;

g) an offering plan to help parks reach decisions about the culturally appropriate treatment of offerings left by traditional religious practitioners and visitors to memorials and cemeteries. It identifies likely offerors and offering places and times and includes options for non-disturbance and for storage in accord with the cofferers' wishes;

h) a long-term research plan to identify foreseeable data needs, for example, for general management plans, and to avoid duplicating studies that make untenable demands on community elders and others, raise redundant questions, and exhaust the goodwill of community cultural experts;

i) inter-regional research plans developed when research might involve a single group in more than one region;

j) a portfolio of approved and current ethnographic task directives, scopes of work, research designs and associated budgets, and study packages for use in resources management plans and budget calls;

k) a current list of applied research ethnographers with appropriate experience;

l) a current list of interested community consultants, and communication channels such as newspapers and local radio stations;

m) copies of special use permits and subsistence and ceremonial maps with protected information;

n) an updated listing of ethnographic resources.

2. General Management Plans and Special Resource Studies

According to *Management Policies* (2:5): "Sufficient information will be available prior to initiating a plan. Each park will develop, gather, compile, store, analyze, and update information about natural and cultural resources and regional demographic, ethnographic, and socioeconomic data relevant to planning and management."

As soon as planning projects are identified, superintendents, ethnographers, and planners will review ethnographic information needs, assess existing data, and program needed studies. The ethnographic overview and assessment will be initiated before or during plan scoping. REAP will be initiated during scoping too so that, consistent with NEPA and NPS policies, consultations with potentially affected groups can start at the earliest possible time. Different REAP techniques will be used during different planning steps, as appropriate, and be integrated into planning schedules so that ethnographic information is available to meet policy requirements. Traditionally associated groups are a major concern, along with more recent neighboring groups and representatives of special interest and occupational groups such as fishermen.

D. Stewardship

1. Parks, Resource Integrity, and Viable Cultural Systems

Ethnographic resources offer windows on places, events, and processes that contribute to the nation's cultural vitality in several ways. On one hand, knowledge about important but poorly known aspects of American life reflected in traditional cultural and natural resources can enhance the Service's public education programs. On the other hand, access to park resources can offer associated groups opportunities to continue traditional practices and maintain traditional community roles if they wish, provided resources are not adversely affected. Peoples' beliefs, traditions, and history are taught or affirmed to new generations through legends or other oral narratives emphasizing features of park landscapes. Whenever resources in parks had been the basis of a group's economy, or spirituality, or somehow contributed and still contribute to traditional community life, parks become part of the local cultural system and contribute to the group's cultural vitality and the nation's cultural diversity. By maintaining the integrity of these ethnographic resources, the NPS helps maintain the nation's diverse physical, natural, and cultural heritages and acknowledges the human dimension of its stewardship role.

The culturally appropriate guardianship of public resources requires consulting the publics that use or may use them and incorporating their suggestions into management decisions to the fullest feasible extent.

2. Notification

Notification occurs before consultation and refers to written advisements to potentially affected groups that NPS will seek public comment on anticipated planning actions. Notification letters establish a record of public notice. Consideration should be given to using local languages. In addition to advising formally recognized community leaders, the broad spectrum of community members should be informed through local newspaper announcements and flyers placed at strategic gathering places. Radio announcements in local languages are useful when populations are widely dispersed or uncomfortable with written materials. Follow-up phone calls are recommended to selected individuals and groups who should have received written notices.

Ethnographers and local organizations can assist in identifying potentially interested local individuals or groups and relocated groups with continued interest in the area.

3. Consultation

Consultation is a process for the exchange of views and information between NPS and different interest groups or stakeholders in a planned undertaking. The process has several goals, including the short-term goal of exchanging information on a particular project or plan and the longer-term goal of establishing or reconfirming mutually beneficial interactions between NPS staff and traditionally associated communities. In effective consultations, NPS staff interact on a face-to-face basis with diverse publics to explain planned actions, discuss potential impacts, and listen to community views, concerns, and issues. In some cases, the dialogue might result in negotiating differences of opinion. Consultation is undertaken not only for NEPA, NAGPRA, and National Historic Preservation Act compliance, but to expand community input into interpretive programs.

Several factors affect the outcomes of consultation, including (a) group social, cultural, and political dynamics, (b) meeting locations and times, (c) communication styles and other variables, and (d) past relationships between NPS and the consultants and among consultants. In inviting community members to consult, for example, consider whether tribal, ethnic, or age groups should be mixed or consulted separately in small meetings. The costs of conducting several small meetings instead of one large meeting are often offset by the positive interactions and useful information they encourage. Take into account appropriate days, hours, seasons, and the need for privacy in selecting places and times. In selecting suitable times and places, consider local transportation patterns, men and women's work schedules, and constraints on consultant time, for example, because of obligatory seasonal ceremonial activities. Communication is another concern: Is English the best language choice for the group? Do written materials accommodate the readership? Are graphic and verbal symbols culturally suitable? Were ceremonial needs and hospitality considered?

Consultation partners should include formal leaders as well as members of the larger community. To meet the Service's government-to-government obligations to Indian tribes and trust territory governments of the Pacific, the NPS will formally consult their government representatives. In addition, tribal government support should be sought for speaking with traditional elders and the community at large. In accord with policy and ANILCA provisions, the NPS will also consult Alaska Native villages and corporations. Hawaiian communities, Native Hawaiian organizations, and groups elsewhere in the Pacific will be consulted when NPS actions affect them.

4. Compliance

Consultation and ethnographic data help meet compliance requirements of legislation and NPS policies, including

a) the National Environmental Policy Act (NEPA), when NPS actions might affect the interests (subsistence, religious, residential, etc.) of tribes and other communities;

b) the American Indian Religious Freedom Act (AIRFA), when NPS actions might affect Native American religious interests;

c) the Alaska National Interest Lands Conservation Act (ANILCA), when NPS actions might affect subsistence activities and associated ways of life;

d) the National Historic Preservation Act (NHPA), when NPS actions affect ethnographic resources with National Register eligibility;

e) the Archaeological Resources Protection Act (ARPA), when archeological activities might affect resources of concern to Native Americans;

f) the Native American Graves Protection and Repatriation Act (NAGPRA), when NPS collections contain materials potentially associated with Native Americans, when planned archeological excavations might affect Native American interests, and when human remains and associated grave goods are discovered accidently;

g) the Presidential Memorandum on Government-to-Government Relations with Native American Tribal Governments, when NPS actions might affect the interests, trust resources, and tribal government rights of federally recognized tribes;

h) Executive Order 13007 on Indian Sacred Sites, when NPS actions might affect the physical integrity of sacred sites, and both access to and ceremonial use of these sites by American Indian religious practitioners in federally recognized tribes.

5. NAGPRA

NAGPRA resulted in substantially changed relationships between the NPS and American Indian tribes, Alaska Native villages and corporations, and Native Hawaiian organizations. The law gives park managers new responsibilities with regard to these groups with respect to the disposition of certain objects in park museum collections, planned excavations on park lands, and inadvertent discoveries on park lands. The NPS assumed responsibilities for summarizing unassociated funerary objects, sacred objects, and objects of cultural patrimony in its collections; for inventorying human remains and associated funerary objects; for consultation; and, under specified conditions, for the repatriation of certain Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. At the same time, lineal descendants, tribes, and Alaskan and Hawaiian entities were accorded new rights to these objects. The NPS completed its summary by the November 16, 1993, deadline and its inventory by the November 16, 1995, deadline.

Instructions for implementing NAGPRA government-wide are in 43 CFR Part 10. NPS-specific guidance for implementing NAGPRA is in Appendix R of this guideline.

6. Treatment

Consultation will consider associated groups' treatment preferences for ethnographically significant resources. Implementing those preferences might not always be feasible, but they should be identified and resolutions negotiated when NPS practices and traditional preferences differ. Traditional users, Navajo for example, might prefer the intentional deterioration rather than preservation of hogans or homes in which

someone died. Maintaining the physical integrity of the few existing park hogans is important for ethnohistory and architecture, but deterioration could be more important in responding to local religious concerns.

7. Protection

Consultations with traditional users will identify measures they believe appropriate for safeguarding ethnographic resources. Differences between their preferences and NPS practices will be negotiated. It might be necessary, for example, to reroute trails so that sacred places are not threatened by excessive visitor use. Park maps should avoid identifying actively used sacred cultural and natural resources and avoid drawing attention to the present sacred uses of massive structures, like those at Mesa Verde, without the concurrence of traditionally associated groups.

8. Registration

Ethnographic resources eligible for listing in the National Register as traditional cultural properties will be identified by ethnographic studies, not isolated surveys and casual interviews. Systematic consultations with associated groups, and studies that include consultations, will address the implications of nominating traditional sacred places to the National Register and identify the groups' preferred forms of treatment for the resources whether or not they are nominated. (For more information see National Register Bulletin 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties*.)

9. Use

The resource management regimes traditionally evolved by local communities include preservation and conservation practices that promote sustainable use when the size of local populations and resource bases remain stable. Where law, regulation, or policy permit subsistence or other traditional use, traditional use studies establish the baseline for monitoring short- and long-term effects of use and effects of park programs on users. Parks should apply that information to the development of management strategies that integrate traditional practices and knowledge.

Where limited collection of sacred plants for personal use is not explicitly allowed but traditional religious practitioners require plant materials for spiritual purposes, longitudinal studies of use should be conducted to determine its effects on plant communities and to develop use strategies that maintain the cultural integrity of the resources. Park-specific procedures or regulations for limited sacred plant collection for personal use should be considered where plants are not endangered or threatened, collection is not explicitly prohibited by law, and collection will not demonstrably disrupt the ecosystem.

NPS policy (*Management Policies* 8:10) permitting American Indians to use peyote in parks for sacramental purposes exemplifies allowances for special cultural use. This is consistent with the American Indian Religious Freedom Act amendments of 1994 that make it lawful for members of American Indian tribes and Alaska Native villages to use, possess, or transport peyote for bona fide traditional ceremonial purposes associated with the practice of a traditional Indian religion. The United States and the states cannot prohibit these activities, which occasionally occur in parks in the Southwest and Rocky Mountains.

10. Education

Developing culturally appropriate information on ethnographic resources and associated peoples requires their early involvement in the preparation of films, maps, brochures, exhibits, and other public programs. Park staff should review interpretive materials for cultural sensitivity and ethnographic accuracy and consult involved communities about the appropriateness of images and information. Harpers Ferry Center exhibit specialists should be informed of the involved communities' concerns. Ethnographers and ethnographic materials should be consulted for background data.

Materials referring to diverse American ethnic and racial groups should reflect the names those groups prefer. For example, although the generic term "Native American" is used in referring to the large body of America's indigenous people, including American Indians, Eskimo, Aleuts, and Pacific Island peoples, many tribes generally prefer to be called "American Indian" when addressed as a group. More specific nomenclature should be adopted to identify particular tribes, tribal groupings, alliances, or confederations such as the Navajo Nation or Lakota Nation if the involved people so indicate.

11. Community Partnerships

Policy provisions for cooperative relationships between parks and neighboring and traditionally associated communities can be implemented through cooperative agreements, memorandums of understanding, and various formal or informal boards, commissions, and meetings. These offer mechanisms for establishing mutually beneficial and stable relationships that continue despite the succession of changing community leaders and park managers. Memorandums of understanding with Native Americans should be considered as a means of expeditiously addressing planning and NAGPRA-related issues and responding to the President's 1994 memorandum encouraging effective consultations and continuing cooperation on a government-to-government basis with Native American tribal governments. Memorandums can further systematic cooperation for purposes of park interpretation, training, internships, and exchanges to enhance cross-cultural learning.

CHECKLIST FOR MANAGEMENT OF ETHNOGRAPHIC RESOURCES

RESEARCH:

- Appropriate studies and consultations document ethnographic resources and uses, traditionally associated people and other affected groups, and cultural affiliations to park resources.
- An annotated bibliography of park-related ethnographic works is maintained.
- Researchers formally collaborate with community cultural experts.
- Studies identify ethnographic resource data, interpretive uses, and resources with National Register potential as traditional cultural properties.

PLANNING:

- REAP and other consultations with traditionally associated groups are initiated during scoping.
- REAP is employed to evaluate alternatives and assess planning impacts on ethnographic resources and associated user groups.
- Planning documents contain current information on traditional resource users and uses, the status of ethnographic data, and the legislative, regulatory, policy, or other bases for use.

STEWARDSHIP:

- Traditionally associated groups and neighbors and the legislative, regulatory, or policy bases for relationships with them are identified and known to park staff.
- Statements for management address traditionally associated people, ethnographic resources, and resource uses.
- The park ethnographic strategy, including consulting, offering, treatment, and reburial plans, is kept current.
- The ERI is maintained.
- Systems exist to monitor effects of use on cultural and natural resources and effects of park plans on authorized uses and traditional users.
- Cultural affiliations of museum objects are known, and repatriation processes are implemented.
- Performance standards of specific park cultural resource specialists include responsibility for partnerships with traditionally associated groups.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX A: Glossary

Terms are defined for the purpose of cultural resource management in the national park system. National Park Service usage does not always follow standard dictionary definitions.

Accession: a transaction whereby one or more museum objects or specimens are acquired in the same manner from one source at one time for a museum collection. Accessions include gifts, exchanges, purchases, field collections, loans, and transfers.

Acquisition: the act or process of acquiring through purchase or donation fee title to or other interest in real property (including development rights or remainder interest). Also applies to museum property (see accession).

Adaptive use: a use for a structure or landscape other than its historic use, normally entailing some modification of the structure or landscape.

Advisory Council on Historic Preservation: an independent federal agency with statutory authority to review and comment on federal actions affecting properties listed in or eligible for the National Register of Historic Places, to advise the President and the Congress on historic preservation matters, and to recommend measures to coordinate activities of federal, state, and local agencies. Its members include Cabinet-level representatives from federal agencies and presidential appointees from outside the federal government.

Anthropology: the scientific study of the human condition, including cultural, biological and physical adaptations over time and in various natural and social environments. Anthropology includes the specializations of archeology, cultural anthropology (including ethnography, ethnology, and applied anthropology), linguistics, and physical anthropology. An **anthropologist** is a scientist with advanced training in any of these subdisciplines.

Archeology: the scientific study, interpretation, and reconstruction of past human cultures from an anthropological perspective based on the investigation of the surviving physical evidence of human activity and the reconstruction of related past environments. Historic archeology uses historic documents as additional sources of information. An **archeologist** is a scientist professionally trained to conduct such studies.

Cultural anthropology: the scientific description and analysis of cultural systems, i.e., systems of behavior (including economic, religious, and social), beliefs (values, ideologies), and social arrangements. It focuses on the lifeways of contemporary peoples but also deals with the recent past (ethnohistory) and with humans in ecosystems. **Cultural anthropologists** are social scientists trained to conduct such research. **Applied ethnographers** specialize in project-related research, including program assessments and evaluations.

Archeological resource: any material remains or physical evidence of past human life or activities which are of archeological interest, including the record of the effects of human activities on the environment. They are capable of revealing scientific or humanistic information through archeological research.

Architectural conservation: the science of preserving a historic structure's materials by observing and analyzing their deterioration, determining causes of and solutions to problems, and directing remedial interventions.

Architectural conservator: a specialist in the scientific analysis of historic materials.

Architectural history: the study of architecture through written records and the examination of structures in order to determine their relationship to preceding, contemporary, and subsequent architecture and events. An **architectural historian** is a historian with advanced training in this specialty.

Archival collection: an accumulation of manuscripts, archival documents, or papers having a shared origin or provenance, or having been assembled around a common topic, format of record, or association (e.g., presidential autographs). The term also refers to the total archival and manuscript holdings of a park.

Archives: the non-current records of an organization or institution preserved for their historic value. Official records of the NPS are managed according to the *Records Management Guideline* (NPS-19) and National Archives and Records Administration standards and are outside the scope of this guideline. The term "archives" is often used to refer to the repository where archives and other historic documents are maintained. See also historic document.

Archivist: a professional responsible for managing and providing access to archival and manuscript collections.

Assembled collection: an accumulation of documents, most often gathered by a collector from multiple sources, often in the same format or about the same topic but generally unrelated by provenance.

Associated records: all documentation generated by the activity of collecting or analyzing artifacts or specimens needed to effectively manage those related objects within museum collections.

Association: the relationship between a historic event, activity, or person and a cultural resource.

Biotic cultural resource: a plant or animal community associated with human settlement and use at a historic property.

Building: an enclosed structure with walls and a roof, consciously created to serve some residential, industrial, commercial, agricultural, or other human use.

Cataloging: the action of assigning and applying a unique identifying or catalog number to a museum object/specimen or group of objects/specimens and recording descriptive and documentary data on the Museum Catalog Record, Form 10-254 (or 10-254B).

Character-defining feature: a prominent or distinctive aspect, quality, or characteristic of a historic property that contributes significantly to its physical character. Structures, objects, vegetation, spatial relationships, views, furnishings, decorative details, and materials may be such features.

Collaborative research: ethnographic research in which community cultural experts participate with applied ethnographers. Collaboration ranges from full partnership and co-authorship to assistance in data gathering and comment on draft findings and interpretations.

Comprehensive historic preservation planning: the logical organization of preservation information pertaining to the identification, evaluation, registration, and treatment of historic properties and the setting of priorities for accomplishing preservation activities.

Conservator (museum object): a person trained in the theoretical and practical aspects of preventive conservation and in performing treatments to prolong the lives of museum objects. Most conservators specialize in specific classes of objects (e.g., paintings, furniture, books, paper, textiles, metals, ceramics and glass, architecture, ethnographic and archeological objects, photographs).

Cultural landscape: a geographic area, including both cultural and natural resources and the wildlife or domestic animals therein, associated with a historic event, activity, or person or exhibiting other cultural or aesthetic values. There are four general kinds of cultural landscape, not mutually exclusive:

Historic site: a landscape significant for its association with a historic event, activity, or person.

Historic designed landscape: a landscape significant as a design or work of art; was consciously designed and laid out either by a master gardener, landscape architect, architect, or horticulturist to a design principle, or by an owner or other amateur according to a recognized style or tradition; has a historical association with a significant person, trend or movement in landscape gardening or architecture, or a significant relationship to the theory or practice of landscape architecture.

Historic vernacular landscape: a landscape whose use, construction, or physical layout reflects endemic traditions, customs, beliefs, or values; in which the expression of cultural values, social behavior, and individual actions over time is manifested in physical features and materials and their interrelationships, including patterns of spatial organization, land use, circulation, vegetation, structures, and objects; in which the physical, biological, and cultural features reflect the customs and everyday lives of people.

Ethnographic landscape: areas containing a variety of natural and cultural resources that associated people define as heritage resources, including plant and animal communities, geographic features, and structures, each with their own special local names.

Cultural practice: a pattern of behavior associated with a particular way of life. Cultural practices are often associated with particular ecosystems, the use of natural resources, and the use or production of sites, structures, objects, and landscape features. Traditional forms of housebuilding, subsistence activities, religious, family, and community ceremonials, and expressive activities such as musical performance, craft production, and folklore are examples of cultural practices.

Cultural resource: an aspect of a cultural system that is valued by or significantly representative of a culture or that contains significant information about a culture. A cultural resource may be a tangible entity or a cultural practice. Tangible cultural resources are categorized as districts, sites, buildings, structures, and objects for the National Register of Historic Places and as archeological resources, cultural landscapes, structures, museum objects, and ethnographic resources for NPS management purposes.

Cultural resource management: the range of activities aimed at understanding, preserving, and providing for the enjoyment of cultural resources. It includes research related to cultural resources, planning for actions affecting them, and stewardship of them in the context of overall park operations. It also includes support for the appreciation and perpetuation of related cultural practices, as appropriate.

Cultural resource specialist: a person professionally trained in one of the cultural resource fields. Included are anthropologists (applied cultural anthropologists, archeologists, ethnographers, and ethnohistorians), architectural historians, architectural conservators, archivists, curators, historians, historical architects, historical landscape architects, landscape historians, and object conservators.

Cultural resource technician: a technically trained person who works directly on or with cultural resources. Included are preservation specialists, historical craftspersons, historical maintenance persons, and museum technicians.

Cultural system: a group's interrelated set of learned behavioral, knowledge, and belief patterns in addition to social, economic, spiritual, and political arrangements for adapting to particular natural and social settings. Associated technology and expressive elements such as folklore and performing and graphic arts are included. Popular synonyms include lifeways, customs, and traditions. Cultural systems are parts of ecosystems.

Culture: a system of behaviors (including economic, religious, and social), beliefs (values, ideologies), and social arrangements.

Curator: a person professionally responsible for the management, preservation, and use of museum objects/specimens. Collection management responsibilities include acquisition and disposal, documentation and cataloging, preventive conservation, storage, access, interpretation and exhibition, and research and publication. Often the curator is a discipline or material culture specialist (e.g., archeology, history, biology, fine arts, Civil War weapons). Curators on park staffs who work directly with collections are known as museum curators; curators in other offices generally are known as staff curators. In the absence of archivists, curators are normally responsible for historic documents.

Data Recovery (salvage): recovery, through professional investigations and documentation, of significant cultural resource materials and data in lieu of in-place resource preservation.

Deaccessioning: a formal procedure whereby museum objects/specimens are permanently removed from a museum collection.

Design: the combination of elements that create the form, plan, space, structure, and style of a historic property.

Design intent: the creative objectives of a designer, architect, landscape architect, engineer, or artist that were applied to the development of a historic property.

Documentation: drawings, photographs, writings, and other media that depict cultural and natural resources.

Ecofact: geological, biological, or botanical evidence used in deciphering the natural environment of an archeological site. It may involve inorganic material (minerals, soils, etc.) or organic material (animal parts, such as bone, teeth, and antlers; plant parts, such as pollen, seeds, and leaves; and human remains, such as bone, teeth, coprolites, and quids).

Ecosystem: interrelated living entities, including humans, and their physical environment.

Emergency operations plan: a document prepared by a park, in cooperation with its regional office, to guide preparations for and responses to emergencies and disasters. Emergency operations plans must give special attention to protecting cultural resources.

Ethnic: a group or category of people who share or believe they share similar characteristics based on, for example, ancestry, language, and religion.

Ethnographic landscape: see cultural landscape.

Ethnographic resource: a site, structure, object, landscape, or natural resource feature assigned traditional legendary, religious, subsistence, or other significance in the cultural system of a group traditionally associated with it.

Ethnography: part of the discipline of cultural anthropology concerned with the systematic description and analysis of cultural systems or lifeways, such as hunting, agriculture, fishing, other food procurement strategies, family life festivals and other religious celebrations. Ethnographic studies of contemporary people and cultures rely heavily on participant observation as well as interviews, oral histories, and review of relevant documents. **Applied ethnography** uses ethnographic data and concepts to identify contemporary issues and design feasible solutions.

Ethnohistory: systematic description (ethnography) and analysis (ethnology) of changes in cultural systems through time, using data from oral histories and documentary materials; anthropologists and historians conduct these studies.

Ethnology: part of the discipline of anthropology concerned with the systematic and comparative analysis of cultures.

Evaluation: process by which the significance of a property is judged and eligibility for National Register of Historic Places is determined.

Excavation: the scientific examination of an archeological site through layer-by-layer removal and study of the contents within prescribed surface units, e.g., square meters.

Feature (archeological): nonportable object, not recoverable from its matrix (usually in an archeological site) without destroying its integrity. Examples are rock paintings, hearths, post holes, floors, and walls.

Feature (historic): (1) a prominent or distinctive aspect, quality, or characteristic of a historic property; (2) a historic property.

Feeling: a property's expression of the aesthetic or historic sense of a particular period of time.

Field photography: photography, other than large-format photography (usually 35 mm), intended for producing documentation.

Field records: notes of measurements taken, field photographs, and other recorded information intended for producing documentation.

Finding aid: a textual or electronic tool that assists researchers in locating or using archival and manuscript collections.

Form 106: "Assessment of Actions Having an Effect on Cultural Resources" form required for all proposed actions that may affect cultural resources. Provided for regional office review of such actions requiring consultation under 36 CFR 800 and the basic form for beginning the process of Section 106 compliance under the 1990 Servicewide Programmatic Agreement.

Historian: specialist with advanced training in the research, interpretation, and writing of history.

Historic American Buildings Survey (HABS)/Historic American Engineering Record (HAER): architectural and engineering documentation programs that produce a thorough archival record of buildings, engineering structures, and cultural landscapes significant in American history and the growth and development of the built environment.

HABS Architectural Data Form: a one-page form intended to provide identifying information for accompanying HABS documentation.

HABS/HAER Inventory Card: a one-page form that includes written data, a sketched site plan, and a 35mm dry mounted contact print.

Historic character: the sum of all visual aspects, features, materials, and spaces associated with a property's history.

Historical context: an organizing structure created for planning purposes that groups information about historic properties based on common themes, time periods, and geographical areas.

Historic designed landscape: see cultural landscape.

Historic district: a geographically definable area, urban or rural, possessing a significant concentration, linkage, or continuity of sites, landscapes, structures, or objects, united by past events or aesthetically by plan or physical developments. A district may also be composed of individual elements separated geographically but linked by association or history. (See National Register Bulletin 15.)

Historic document: any recorded information in any medium–paper, magnetic tape, film, etc.–that has a direct, physical association with past human event, activity, observation, experience, or idea.

Historic fabric: see material.

Historic landscape: a cultural landscape associated with events, persons, design styles, or ways of life that are significant in American history, landscape architecture, archeology, engineering, and culture; a landscape listed in or eligible for the National Register of Historic Places.

Historic property: a district, site, structure, or landscape significant in American history, architecture, engineering, archeology, or culture; an umbrella term for all entries in the National Register of Historic Places.

Historic scene: the overall appearance of all cultural resources and their surroundings as they were in the historic period; the cultural resources and their interrelationships that provide the context for understanding and interpreting the events, ideas, or persons associated with a park.

Historic site: the site of a significant event, prehistoric or historic occupation or activity, or structure or landscape whether extant or vanished, where the site itself possesses historical, cultural, or archeological value apart from the value of any existing structure or landscape; see cultural landscape.

Historic vernacular landscape: see cultural landscape.

Historical archeologist: scientist with advanced training in historical archeology and in the use of historical documents in the reconstruction of the past (see anthropology).

Historical archeology: subdiscipline of archeology concerned with the remains left by literate societies (in contrast to prehistoric archeology, although the distinction is not always clear-cut). In the United States, historical archeology generally deals with the evidences of Euro-American societies and of aboriginal societies after major cultural disruption or material change from Euro-American contact.

Historical architect: specialist in the science and art of architecture with specialized advanced training in the principles, theories, concepts, methods, and techniques of preserving prehistoric and historic structures.

Historical landscape architect: specialist in the science and art of landscape architecture with advanced training in the principles, theories, concepts, methods, and techniques of preserving cultural landscapes.

Historical significance: the meaning or value ascribed to a structure, landscape, object, or site based on the National Register criteria for evaluation. It normally stems from a combination of association and integrity.

History: study of the past through written records, oral history, and material culture. Evidence from these is compared, judged for veracity, placed in chronological or topical sequence, and interpreted in light of preceding, contemporary, and subsequent events.

Identification: process through which cultural resources are made known.

In-kind: in the same manner or with something equal in substance having a similar or identical effect.

Integrity: the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during its historic or prehistoric period; the extent to which a property retains its historic appearance.

Intensive survey: a systematic, detailed examination of an area designed to gather information about historic properties sufficient to evaluate them against predetermined criteria of significance within specific historic contexts.

Inventory: a list of cultural resources, usually of a given type and/or in a given area.

Landscape historian: a historian concentrating on the study of landscapes through written records and field work in order to determine their relationship to preceding, contemporary, and subsequent landscape events.

Large format photograph: photograph taken with a 4x5, 5x7, or 8x10 negative and means to correct perspective distortion.

Library: a collection of published materials associated with the theme or purpose of a particular park, center, region, or office and organized to provide bibliographic, electronic, intellectual, and physical access to staff and visitors for reference and research use. Materials may include, but are not limited to, books, reports, journals, pamphlets, electronic media, microforms, and photographic, graphic, and audio documents.

Location: the place where the historic property was constructed or the place where the historic event(s) occurred.

Manuscript collection: a group of textual, electronic, sound, or visual documents assembled most commonly for its historical or literary value.

Material: the physical elements that were combined or deposited to form a property. Historic material or historic fabric is that from a historically significant period, as opposed to material used to maintain or restore a property following its historic period(s).

Measured drawings: drawings depicting existing conditions or other relevant features of historic structures, landscapes, or objects. Measured drawings are usually produced in ink on archivally stable material, such as polyester film.

Museum collection: assemblage of objects, works of art, historic documents, and/or natural history specimens collected according to a rational scheme and maintained so they can be preserved, studied, and interpreted for public benefit. Museum collections normally are kept in park museums, although they may also be maintained in archeological and historic preservation centers.

Museum object: a material thing possessing functional, aesthetic, cultural, symbolic, and/or scientific value, usually movable by nature or design. Museum objects include prehistoric and historic objects, artifacts, works of art, archival material, and natural history specimens that are part of a museum collection. Structural components may be designated museum objects when removed from their associated structures. (Large or immovable properties, such as monumental statuary, trains, nautical vessels, cairns, and rock paintings, are defined as structures or features of sites.)

Museum object conservation: measures taken to prolong the life of a museum object and its associated data. Museum object conservation encompasses the following activities:

Preventive Conservation: non-interventive action taken to prevent damage to and minimize deterioration of a museum object. Such actions include monitoring, recording, and controlling environmental agents; inspecting and recording the condition of objects; establishing an integrated pest management program; practicing proper handling, storage, exhibit, housekeeping, and packing and shipping techniques; and incorporating needed information and procedures about objects in emergency operation plans.

Stabilization: interventive treatment action taken to increase the stability or durability of an object when preventive conservation measures fail to decrease its rate of deterioration to an acceptable level or when it has deteriorated so far that its existence is jeopardized.

Restoration: interventive treatment action taken to bring an object as close as possible to its original or former appearance by removing accretions and later additions and/or by replacing missing elements.

Museum property: an assemblage of museum objects collected according to some rational scheme and maintained so that they can be preserved, studied, or interpreted for public benefit. **Museum objects** include prehistoric and historic objects, artifacts, works of art, archival documents, and natural history specimens that are part of museum collections. Elements, fragments, and components of structures are objects if they are no longer a part of the original structure. Museum property does not include those items necessary to display a collection (e.g., exhibit cases, dioramas, special lighting, and graphics) or museum records (e.g., accession, catalog, loan, and inventory records). Museum collections normally are kept in park museums, although they may also be maintained in archeological and historic preservation centers.

Museum records: records generated by the museum property system to manage museum property, including accession, catalog, inventory, and loan records.

National historic landmark: a district, site, building, structure, or object of national historical significance, designated by the Secretary of the Interior under authority of the Historic Sites Act of 1935 and entered in the National Register of Historic Places.

National Register of Historic Places: the comprehensive list of districts, sites, buildings, structures, and objects of national, regional, state, and local significance in American history, architecture, archeology, engineering, and culture kept by the NPS under authority of the National Historic Preservation Act of 1966.

Native American: pertaining to American Indian tribes or groups, Eskimos and Aleuts, and Native Hawaiians, Samoans, Chamorros, and Carolinians of the Pacific Islands. Groups recognized by the federal and state governments and named groups with long-term social and political identities who are defined by themselves and others as Indian are included.

Non-official records: legally defined as "library and museum material made or acquired and preserved solely for reference or exhibition purposes, extra copies of documents preserved only for convenience of reference, and stocks of publications and of processed documents . . ." (44 USC 3302). Includes all museum archival collections. Referred to as "non-records" by the National Archives and Records Administration.

Non-records: see non-official records.

Official records: documents made or received by NPS offices as a part of transacting business and preserved as evidence of the offices' actions or functions or for their informational value. Referred to as "records" by the National Archives and Records Administration.

Organizational archives (acquired archives): documents created by a non-NPS organization as a routine part of doing business, now held in the physical custody of the NPS as a museum archival and manuscript collection.

Park-associated communities: peoples whose customary ways of life affect and are affected by park management. Includes neighboring, resident, and former resident groups.

Participant observation: the primary field method of ethnographic anthropological research; involves observing and recording behaviors and activities while the researcher is residing and participating in the community under study.

Period of significance: the span of time in which a property attained the significance for which it meets the National Register criteria.

Prehistory: the course of events in the period before recorded history.

Preservation: the act or process of applying measures to sustain the existing form, integrity, and material of a historic structure, landscape or object. Work may include preliminary measures to protect and stabilize the property, but generally focuses upon the ongoing preservation maintenance and repair of historic materials and features rather than extensive replacement and new work. For historic structures exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project. For application to museum objects see museum object conservation.

Preservation maintenance: action to mitigate wear and deterioration of a historic property without altering its historic character by protecting its condition, repairing when its condition warrants with the least degree of intervention including limited replacement in-kind, replacing an entire feature in-kind when the level of deterioration or damage of materials precludes repair, and stabilization to protect damaged materials or features from additional damage. For archeological sites it includes work to moderate, prevent, or arrest erosion. For museum objects it includes actions to prevent damage and to minimize deterioration by practicing preventive conservation or by performing suitable treatments on objects themselves. Types of preservation maintenance are:

Housekeeping: the removal of undesirable deposits of soil in ways that minimize harm to the surfaces treated, repeated at short intervals so that the gentlest and least radical methods can be used.

Routine maintenance: usually consists of service activities such as tightening, adjusting, oiling, pruning, etc.

Cyclic maintenance: maintenance performed less frequently than annually; usually involves replacement or at least mending of material.

Stabilization: action to render an unsafe, damaged, or deteriorated property stable while retaining its present form.

Preventive conservation: see museum object conservation.

Property type: a grouping of individual properties based on a set of shared physical or associative characteristics.

Protection: action to safeguard a historic property by defending or guarding it from further deterioration, loss, or attack or shielding it from danger or injury. In the case of structures and landscapes such action is generally of a temporary nature and anticipates future preservation treatment; in the case of archeological sites, the protective measure may be temporary or permanent. Protection in its broadest sense also includes long-term efforts to deter or prevent vandalism, theft, arson, and other criminal acts against cultural resources.

Provenance: (1) the entity that created an object or accumulated a collection; (2) the history of physical custody of an object or collection.

Reconnaissance study: a synthesis of cultural resource information describing the kinds of cultural resources in a study area and summarizing their significance; sometimes called a cultural resource overview, and may include limited field investigations.

Reconstruction: (1) the act or process of depicting, by means of new work, the form, features, and detailing of a non-surviving historic structure or landscape, or any part thereof, for the purpose of replicating its appearance at a specific time and in its historic location; (2) the resulting structure, landscape, or part thereof.

Records: refers to all information fixed in a tangible form. Used by the National Archives and Records Administration to refer to official records (q.v.).

Rehabilitation: the act or process of making possible an efficient compatible use for a historic structure or landscape through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural and architectural values.

Repair: action to correct deteriorated, damaged, or faulty materials or features of a structure or landscape.

Replacement in-kind: see in-kind.

Reproduction (of objects): the construction or fabrication of an accurate copy of an object.

Research design: a statement of proposed identification, documentation, evaluation, investigation, or other research that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

Restoration: (1) the act or process of accurately depicting the form, features, and character of a historic structure, landscape, or object as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period; (2) the resulting structure, landscape, or object.

Sample survey: survey of a representative sample of lands within a given area in order to generate or test predictions about the types and distributions of cultural resources in the entire area.

Section l06, or "l06": refers to Section l06 of the National Historic Preservation Act of l966, which requires federal agencies to take into account the effects of their proposed undertakings on properties included or eligible for inclusion in the National Register of Historic Places and give the Advisory Council on Historic Preservation a reasonable opportunity to comment on the proposed undertakings.

Select existing drawings: original construction or later alteration drawings of historic structures, landscapes, and objects that depict their historical values.

Setting: the physical environment of a historic property; the character of the place in which the property played its historical role.

Significance: see historical significance.

Sketch plan: a plan, generally not to exact scale although often drawn from measurements, wherein the features of a structure or landscape are shown in proper relation and proportion to one another.

Spiritual activity field: a spiritually important area identified by traditional religious practitioners around a place with traditional sacred significance.

Stabilization: see preservation maintenance.

State historic preservation officer (SHPO): an official within each state appointed by the governor to administer the state historic preservation program and carry out certain responsibilities relating to federal undertakings within the state.

Structure: a constructed work, usually immovable by nature or design, consciously created to serve some human activity. Examples are buildings of various kinds, monuments, dams, roads, railroad tracks, canals, millraces, bridges, tunnels, locomotives, nautical vessels, stockades, forts and associated earthworks, Indian mounds, ruins, fences, and outdoor sculpture. In the National Register program "structure" is limited to functional constructions other than buildings.

Submerged cultural resource: underwater historic or prehistoric remains.

Sub-official records: copies of official records made for informational or reference purposes.

Subsistence: the traditional use of natural plants and wild animals for personal or family consumption, for the making and selling of handicraft articles out of the nonedible byproducts of fish and wildlife resources taken for personal or family use or consumption.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX B: Laws, Regulations, and Orders

Laws and Executive Orders

The guidelines for cultural resource management in the national park system are derived from a hierarchy of laws, proclamations, orders, regulations, and policies. Primary among these are the acts and proclamations establishing individual parks, which state the congressional or presidential intent for including them in the system. Other laws and executive orders have general application to cultural resource management throughout the park system. A list of the most important of these follows.

Antiquities Act of 1906 (P.L. 59-209, 34 Stat. 225): provided for protection of historic, prehistoric, and scientific features on federal lands, with penalties for unauthorized destruction or appropriation of antiquities; authorized the President to proclaim national monuments; authorized scientific investigation of antiquities on federal lands subject to permit and regulations.

National Park Service Act of August 25, 1916 (P.L. 64-235, 39 Stat. 535): established the National Park Service; directed it to manage the parks "to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

Historic Sites Act of 1935 (P.L. 74-292, 49 Stat. 666): declared "a national policy to preserve for public use historic sites, buildings, and objects . . ."; authorized the programs known as the Historic American Buildings Survey, the Historic American Engineering Record, and the National Historic Landmarks Survey; authorized the NPS to "restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archaeological significance and . . . establish and maintain museums in connection therewith"; authorized cooperative agreements with other parties to preserve and manage historic properties.

Management of Museum Properties Act of 1955 (P.L. 84-127, 69 Stat. 242): authorized the NPS to accept donations or bequests of museum properties, purchase them from donated funds, exchange them, and receive and grant museum loans.

Reservoir Salvage Act of 1960 (P.L. 86-523, 74 Stat. 220): provided for the recovery and preservation of "historical and archeological data (including relics and specimens)" that might be lost or destroyed in the construction of dams and reservoirs.

Department of Transportation Act of 1966 (P.L. 89-670, 80 Stat. 931): stated in Sec 4(f) that the secretary of transportation "shall not approve any program or project which requires the use of any land from a public park, recreation area, . . . or historic site unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, . . . or historic site resulting from such use."

National Historic Preservation Act of 1966 (P.L. 89-665, 80 Stat. 915; as amended by P.L. 91-243, P.L. 93-54, P.L. 94-422, P.L. 94-458, P.L. 96-199, P.L. 96-244, P.L. 96-515, P.L 98-483, P.L. 99-514, P.L. 100-127, and P.L. 102-575): declared a national policy of historic preservation, including the encouragement of preservation on the state and private levels; authorized the secretary of the interior to expand and maintain a National Register of Historic Places including properties of state and local as well as national significance; authorized matching federal grants to the states and the National Trust for Historic Preservation for surveys and planning and for acquiring and developing National Register properties; established the Advisory Council on Historic Preservation; required federal agencies to consider the effects of their undertakings on National Register properties and provide the Advisory Council opportunities to comment (Section 106). Amended in 1976 (P.L. 94-422) to expand Section 106 to properties eligible for as well as listed in the National Register. Amended in 1980 (P.L. 96-515) to incorporate E.O. 11593 requirements (see below), to give national historic landmarks extra protection in federal project planning, and to permit federal agencies to lease historic properties and apply the proceeds to any National Register properties under their administration. Amended in 1992 to, among other things, redefine federal undertakings, address "anticipatory demolition," and emphasize the interests and involvement of Native Americans and Native Hawaiians.

National Environmental Policy Act of 1969 (P.L. 91-190; 31 Stat. 852): declared a federal policy to "preserve important historic, cultural, and natural aspects of our national heritage"; required federal agencies to "utilize a systematic, interdisciplinary approach which will ensure the integrated use of the natural and social sciences . . . in planning and in decision making which may have an impact on man's environment."

Executive Order 11593, *Protection and Enhancement of the Cultural Environment*, May 13, 1971 (36 FR 8921): instructed all federal agencies to support the preservation of cultural properties; directed them to identify and nominate to the National Register cultural properties under their jurisdiction and to "exercise caution . . . to assure that any federally owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered."

Archeological and Historic Preservation Act of 1974 (P.L. 93-291; 88 Stat. 174): amended the 1960 Reservoir Salvage Act; provided for the preservation of significant scientific, prehistoric, historic, and archeological materials and data that might be lost or destroyed as a result of federally sponsored projects; provided that up to one percent of project costs could be applied to survey, data recovery, analysis, and publication.

Mining in the Parks Act of 1976 (P.L. 94-429; 90 Stat. 1342): provided for curtailment or increased regulation of mining in the parks; directed the secretary of the interior to monitor national historic and natural landmarks for mining threats and seek the advice of the Advisory Council on Historic Preservation on mitigating measures.

Tax Reform Act of 1976 (P.L. 94-455; 90 Stat. 1916): provided tax incentives to encourage the preservation of commercial historic structures.

General Authorities Act of 1976 (P.L. 94-458; 90 Stat. 1939): allowed the secretary of the interior "to withhold from disclosure to the public, information relating to the location of sites or objects listed on the National Register whenever he determines that the disclosure of specific information would create a risk of destruction or harm to such sites or objects."

Public Buildings Cooperative Use Act of 1976 (P.L. 94-541; 90 Stat. 2505): required the General Services Administration to acquire space for federal agencies in buildings of architectural or cultural significance where feasible; amended the Architectural Barriers Act of August 12, 1968, relating to the accessibility of certain buildings to the physically handicapped.

American Indian Religious Freedom Act of 1978 (P.L. 95-341; 92 Stat. 469): declared "the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including, but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonial and traditional rites."

Archaeological Resources Protection Act of 1979 (P.L. 96-95; 93 Stat. 712): defined archeological resources as any material remains of past human life or activities that are of archeological interest and at least 100 years old; required federal permits for their excavation or removal and set penalties for violators; provided for preservation and custody of excavated materials, records, and data; provided for confidentiality of archeological site locations; encouraged cooperation with other parties to improve protection of archeological resources. Amended in 1988 to require development of plans for surveying public lands for archeological resources and systems for reporting incidents of suspected violations.

Alaska National Interest Lands Conservation Act of 1980 (P.L. 96-487): added lands to the National Wildlife Refuge, national wilderness preservation and national park systems, and provided for specific exceptions to general NPS legal authorities for parks in Alaska, including special provisions related to subsistence and rights of way.

World Heritage Convention, 1980 (P.L. 96-515, 94 Stat. 3000): Title IV of National Historic Preservation Act Amendments directed the secretary of the interior to nominate properties of international significance to the World Heritage List; required federal agencies to consider the effects of their undertakings on properties outside the United States on the World Heritage List or on the applicable countries' equivalents of the National Register.

Abandoned Shipwreck Act of 1987 (P.L. 100-298; 102 Stat. 432): asserts U.S. Government title to three categories of abandoned shipwrecks: those embedded in a state's submerged lands; those embedded in coralline formations protected by a state on its submerged lands, and those located on a state's lands that are included or determined eligible for inclusion in the National Register of Historic Places. The law then transfers title for a majority of those shipwrecks to the respective states, and provides that states develop policies for management of the wrecks so as to protect natural resources, permit reasonable public access, and allow for recovery of shipwrecks consistent with the protection of historical values and environmental integrity of wrecks and sites.

Native American Graves Protection and Repatriation Act of 1990 (P.L. 101-601; 104 Stat. 3049): assigns ownership or control of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony that are excavated or discovered on federal lands or tribal lands after passage of the act to lineal descendants or affiliated Indian tribes or Native Hawaiian organizations; establishes criminal penalties for trafficking in human remains or cultural objects; requires federal agencies and museums that receive federal funding to inventory Native American human remains and associated funerary objects in their possession or control and identify their cultural and geographical affiliations within 5 years, and prepare summaries of information about Native American unassociated funerary objects, sacred objects, or objects of cultural patrimony. This is to provide for repatriation of such items when lineal descendants, Indian tribes, or Native Hawaiian organizations request it.

Executive Order 13007, *Indian Sacred Sites*, May 24, 1996 (61 FR 26771): instructs all federal land management agencies, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and to avoid adversely affecting the physical integrity of such sacred sites.

Regulations

Regulations are promulgated and published in the *Code of Federal Regulations* (CFR) to direct the implementation of laws. The following CFR citations are most pertinent to cultural resource management.

36 CFR 2.5 (NPS Act of 1916) states conditions under which park superintendents may permit collection of plants, fish, wildlife, rocks, and minerals, including museum catalog requirements.

36 CFR 18 (National Historic Preservation Act of 1966), "Leases and Exchanges of Historic Property," governs the historic property leasing and exchange provisions of this law.

36 CFR 60 (NHPA and EO 11593), "National Register of Historic Places," addresses concurrent state and federal nominations, nominations by federal agencies, revision of nominations, and removal of properties from the National Register.

36 CFR 61 (NHPA and EO 11593), "Procedures for Approved State and Local Government Historic Preservation Programs," establishes standards for the approval of state historic preservation programs; requires state historic preservation officers to conduct statewide surveys of cultural properties, prepare and implement state preservation plans, and cooperate with federal agencies in Section 106 compliance; sets qualification standards for preservation professionals.

36 CFR 63 (NHPA and EO 11593), "Determinations of Eligibility for inclusion in the National Register of Historic Places," establishes process for federal agencies to obtain determinations of eligibility on properties.

36 CFR 65 (Historic Sites Act of 1935), "National Historic Landmarks Program," establishes criteria and procedures for identifying properties of national significance, designating them as national historic landmarks, revising landmark boundaries, and removing landmark designations.

36 CFR 67, "Historic Preservation Certifications Pursuant to the Tax Reform Act of 1976, the Revenue Act of 1978, the Tax Treatment Extension Act of 1980, and the Economic Recovery Tax Act of 1981," establishes procedures whereby owners or holders of long-term leases for old and/or historic buildings may obtain certifications to gain federal tax credits for rehabilitation; describes tax deductions for owners who donate interests in cultural resources for preservation purposes.

36 CFR 68 (NHPA) contains the secretary of the interior's standards for historic preservation projects, including acquisition, protection, stabilization, preservation, rehabilitation, restoration, and reconstruction.

36 CFR 79 (NHPA and ARPA), "Curation of Federally Owned and Administered Archeological Collections," provides standards, procedures and guidelines to be followed by Federal agencies in preserving and providing adequate long-term curatorial services for archeological collections of prehistoric and historic artifacts and associated records that are recovered under Section 110 of the NHPA, the Reservoir Salvage Act, ARPA and the Antiquities Act.

36 CFR 800 (NHPA and EO 11593), "Protection of Historic and Cultural Properties," includes regulations of the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act as amended and presidential directives issued pursuant thereto.

43 CFR 3 (Antiquities Act) establishes procedures to be followed for permitting the excavation or collection of prehistoric and historic objects on federal lands.

43 CFR 7, Subparts A and B (Archaeological Resources Protection Act, as amended), "Protection of Archeological Resources, Uniform Regulations" and "Department of the Interior Supplemental Regulations," provides definitions, standards, and procedures for federal land managers to protect archeological resources and provides further guidance for Interior bureaus on definitions, permitting procedures, and civil penalty hearings.

43 CFR 10 (NAGPRA) establishes a systematic process for determining the rights of lineal descendants, Indian tribes, and Native Hawaiian organizations to certain Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony with which they are affiliated.

NPS Orders and Guidance

The following NPS orders and guidance pertain to cultural resource management.

Director's Order 24, "Standards for NPS Museum Collections Management," establishes mandatory standards for preserving, protecting, and documenting NPS museum collections.

Director's Order 26, "Projects Must Fund Basic Preservation of Museum Collections They Generate," provides guidance to ensure that projects that generate museum collections include sufficient funding for documentation and basic preservation of those collections.

Director's Order 27, "Historic Property Leases and Exchanges," elaborates on the leasing and exchange of historic properties under Section 111 of the National Historic Preservation Act of 1966 as amended.

Staff Directive 96-1, "Linking Cultural and Natural Resource and Socio-economic Data to Park Planning and Management," provides guidance on the kinds and level of detail of information needed about park resources for planning and decision-making and identifies sources of that information.

Department of the Interior Interim Standards for Documentation, Preservation and Protection of Museum Property (September 1990). This document provides interim standards for documentation, preservation, and protection of Department of the Interior museum property and guidance for meeting those standards. The standards are to be applied at each unit that manages museum property.

National Park Service Abandoned Shipwreck Act Guidelines (55 FR 50116, Dec. 4, 1990; 55 FR 51528, Dec. 14, 1990; 56 FR 7875, Feb. 26, 1991) assist states and federal agencies in developing legislation and regulations to carry out their responsibilities under the Abandoned Shipwreck Act of 1987. They provide advice on establishing shipwreck management programs; funding shipwreck programs and projects; surveying, identifying, documenting, and evaluating shipwrecks; providing for recovery of shipwrecks; providing public access to shipwrecks; interpreting shipwreck sites; establishing volunteer programs; and creating and operating underwater parks or preserves.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX C: Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation

These standards and guidelines are not regulatory and do not set or interpret agency policy. They are intended to provide technical advice about archeological and historic preservation activities and methods.

The Standards and Guidelines are prepared under the authority of sections 101(f), (g), and (h), and section 110 of the National Historic Preservation Act of 1966, as amended. State Historic Preservation Officers; Federal Preservation Officers including those of the Department of Agriculture, Department of Defense, Smithsonian Institution and General Services Administration; the Advisory Council on Historic Preservation; the National Trust for Historic Preservation; and other interested parties were consulted during the development of the Standards and Guidelines.

Purpose

The Standards and the philosophy on which they are based result from nearly thirty years of intensive preservation activities at the Federal, State, and local levels.

The purposes of the Standards are:

- To organize the information gathered about preservation activities.
- To describe results to be achieved by Federal agencies, States, and others when planning for the identification, evaluation, registration and treatment of historic properties.
- To integrate the diverse efforts of many entities performing historic preservation into a systematic effort to preserve our nation's culture heritage.

Uses of the Standards

The following groups or individuals are encouraged to use these Standards:

- Federal agency personnel responsible for cultural resource management pursuant to section 110 of the National Historic Preservation Act, as amended, in areas under Federal jurisdiction. A separate series of guidelines advising Federal agencies on their specific historic preservation activities under section 110 has been prepared.
- State Historic Preservation Offices responsible under the National Historic Preservation Act, as amended, by making decisions about the preservation of historic properties in their States in accordance with appropriate regulations and the Historic Preservation Fund Grants Management Manual. The State Historic Preservation Offices serve as the focal point for preservation planning and act as a central state-wide repository of collected information.
- Local governments wishing to establish a comprehensive approach to the identification, evaluation, registration and treatment of historic properties within their jurisdictions.
- Other individuals and organizations needing basic technical standards and guidelines for historic preservation activities.

Organization

This material is organized in three sections: Standards; Guidelines; and recommended technical sources, cited at the end of each set of guidelines. Users of this document are expected to consult the recommended technical sources to obtain guidance in specific cases.

Contents

- Standards for Archeological Documentation
- Guidelines for Archeological Documentation

- Standards for Architectural and Engineering Documentation
- Guidelines for Architectural and Engineering Documentation

- Standards for Evaluation
- Guidelines for Evaluation

- Standards for Historical Documentation
- Guidelines for Historical Documentation

- Standards for Identification
- Guidelines for Identification

- Standards for Preservation Planning
- Guidelines for Preservation Planning

- Standards for Registration
- Guidelines for Registration

- Standards for Treatment of Historic Properties

- Preservation Terminology
- Professional Qualifications Standards

Secretary of the Interior's Standards for Preservation Planning

Preservation planning is a process that organizes preservation activities (identification, evaluation, registration and treatment of historic properties) in a logical sequence. The Standards for Planning discuss the relationship among these activities while the remaining activity standards consider how each activity should be carried out. The Professional Qualifications Standards discuss the education and experience required to carry out various activities.

The Standards for Planning outline a process that determines when an area should be examined for historic properties, whether an identified property is significant, and how a significant property should be treated.

Preservation planning is based on the following principles:

- Important historic properties cannot be replaced if they are destroyed. Preservation planning provides for conservative use of these properties, preserving them in place and avoiding harm when possible and altering or destroying properties only when necessary.

- If planning for the preservation of historic properties is to have positive effects, it must begin before the identification of all significant properties has been completed. To make responsible decisions about historic properties, existing information must be used to the maximum extent and new information must be acquired as needed.

- Preservation planning includes public participation. The planning process should provide a forum for open discussion of preservation issues. Public involvement is most meaningful when it is used to assist in defining values of properties and preservation planning issues, rather than when it is limited to review of decisions already made. Early and continuing public participation is essential to the broad acceptance of preservation planning decisions.

Preservation planning can occur at several levels or scales: in a project area; in a community; in a State as a whole; or in the scattered or contiguous landholdings of a Federal agency. Depending on the scale, the planning process will involve different segments of the public and professional communities and the resulting plans will vary in detail. For example, a State preservation plan will likely have more general recommendations than a plan for a project area or a community. The planning process described in these Standards is flexible enough to be used at all levels while providing a common structure which promotes coordination and minimizes duplication of effort. The Guidelines for Preservation Planning contain additional information about how to integrate various levels of planning.

Standard I. Preservation Planning Establishes Historic Contexts

Decisions about the identification, evaluation, registration and treatment of historic properties are most reliably made when the relationship of individual properties to other similar properties is understood. Information about historic properties representing aspects of history, architecture, archeology, engineering and culture must be collected and organized to define these relationships. This organizational framework is called a "historic context." The historic context organizes information based on a cultural theme and its geographical and chronological limits. Contexts describe the significant broad patterns of development in an area that may be represented by historic properties. The development of historic contexts is the foundation for decisions about identification, evaluation, registration and treatment of historic properties.

Standard II. Preservation Planning Uses Historic Contexts To Develop Goals and Priorities for the Identification, Evaluation, Registration and Treatment of Historic Properties.

A series of preservation goals is systematically developed for each historic context to ensure that the range of properties representing the important aspects of each historic context is identified, evaluated and treated. Then priorities are set for all goals identified for each historic context. The goals with assigned priorities established for each historic context are integrated to produce a comprehensive and consistent set of goals and priorities for all historic contexts in the geographical area of a planning effort.

The goals for each historic context may change as new information becomes available. The overall set of goals and priorities are then altered in response to the changes in the goals and priorities for the individual historic contexts.

Activities undertaken to meet the goals must be designed to deliver a usable product within a reasonable period of time. The scope of the activity must be defined so the work can be completed with available budgeted program resources.

Standard III. The Results of Preservation Planning Are Made Available for Integration Into Broader Planning Processes

Preservation of historic properties is one element of larger planning processes. Planning results, including goals and priorities, information about historic properties, and any planning documents, must be transmitted in a usable form to those responsible for other planning activities. Federally mandated historic preservation planning is most successfully integrated into project management planning at an early stage. Elsewhere, this integration is achieved by making the results of preservation planning available to other governmental planning bodies and to private interests whose activities affect historic properties.

Secretary of the Interior's Guidelines for Preservation Planning

Introduction

These Guidelines link the Standards for Preservation Planning with more specific guidance and technical information. They describe one approach to meeting the Standards for Preservation Planning. Agencies, organizations or individuals proposing to approach planning differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

- Managing the Planning Process
- Developing Historic Contexts
- Developing Goals for a Historic Context
- Integrating Individual Historic Contexts–Creating the Preservation Plan
- Coordinating with Management Frameworks
- Recommended Sources of Technical Information
- Managing the Planning Process

The preservation planning process must include an explicit approach to implementation, a provision for review and revision of all elements, and a mechanism for resolving conflicts within the overall set of preservation goals and between this set of goals and other land use planning goals. It is recommended that the process and its products be described in public documents.

Implementing the Process

The planning process is a continuous cycle. To establish and maintain such a process, however, the process must be divided into manageable segments that can be performed, within a defined period, such as a fiscal year or budget cycle. One means of achieving this is to define a period of time during which all the preliminary steps in the planning process will be completed. These preliminary steps would include setting a schedule for subsequent activities.

Review and Revision

Planning is a dynamic process. It is expected that the content of the historic contexts described in Standard I and the goals and priorities described in Standard II will be altered based on new information obtained as planning proceeds. The incorporation of this information is essential to improve the content of the plan and to keep it up-to-date and useful. New information must be reviewed regularly and systematically, and the plan revised accordingly.

Public Participation

The success of the preservation planning process depends on how well it solicits and integrates the views of various groups. The planning process is directed first toward resolving conflicts in goals for historic preservation, and second toward resolving conflicts between historic preservation goals and other land use planning goals. Public participation is integral to this approach and includes at least the following actions:

1. Involving historians, architectural historians, archeologists, folklorists and persons from related disciplines to define, review and revise the historic contexts, goals and priorities;
2. Involving interested individuals, organizations and communities in the planning area in identifying the kinds of historic properties that may exist and suitable protective measures;
3. Involving prospective users of the preservation plan in defining issues, goals and priorities;
4. Providing for coordination with other planning efforts at local, State, regional and national levels, as appropriate; and
5. Creating mechanisms for identifying and resolving conflicts about historic preservation issues.

The development of historic contexts, for example, should be based on the professional input of all disciplines involved in preservation and not be limited to a single discipline. For prehistoric archeology, for example, data from fields such as geology, geomorphology and geography may also be needed. The individuals and organizations to be involved will depend, in part, on those present or interested in the planning area.

Documents Resulting from the Planning Process

In most cases, the planning process produces documents that explain how the process works and that discuss the historic contexts and related goals and priorities. While the process can operate in the absence of these documents, planning documents are important because they are the most effective means of communicating the process and its recommendations to others. Planning documents also record decisions about historic properties.

As various parts of the planning process are reviewed and revised to reflect current information, related documents must also be updated. Planning documents should be created in a form that can be easily revised. It is also recommended that the format language and organization of any documents or other materials (visual aids, etc.) containing preservation planning information meet the needs of prospective users.

Developing Historic Contexts

General Approach

Available information about historic properties must be divided into manageable units before it can be useful for planning purposes. Major decisions about identifying, evaluating, registering and treating historic properties are most reliably made in the context of other related properties. A historic context is an organizational format that groups information about related historic properties, based on a theme, geographic limits and chronological period. A single historic context describes one or more aspects of the historic development of an area, considering history, architecture, archeology, engineering and culture and identifies the significant patterns that individual historic properties represent, for example, Coal Mining in Northeastern Pennsylvania between 1860 and 1930. A set of historic contexts is a comprehensive summary of all aspects of the history of the area.

The historic context is the cornerstone of the planning process. The goal of preservation planning is to identify, evaluate, register and treat the full range of properties representing each historic context, rather than only one or two types of properties. Identification activities are organized to ensure that research and survey activities include properties representing all aspects of the historic context. Evaluation uses the historic context as the framework within which to apply the criteria for evaluation to specific properties or property types. Decisions about treatment of properties are made with the goal of treating the range of properties in the context. The use of historic contexts in organizing major preservation activities ensures that those activities result in the preservation of the wide variety of properties that represent our history, rather than only a small, biased sample of properties.

Historic contexts, as theoretical constructs, are linked to actual historic properties through the concept of property type. Property types permit the development of plans for identification, evaluation and treatment even in the absence of complete knowledge of individual properties. Like the historic context, property types are artificial constructs which may be revised as necessary.

Historic contexts can be developed at a variety of scales appropriate for local, State and regional planning. Given the probability of historic contexts overlapping in an area, it is important to coordinate the development and use of contexts at all levels. Generally, the State Historic Preservation Office possesses the most complete body of information about historic properties and, in practice, is in the best position perform this function.

The development of historic contexts generally results in documents that describe the prehistoric processes or patterns that define the context. Each of the contexts selected should be developed to the point of identifying important property types to be useful in later preservation decision-making. The amount of detail included in these summaries will vary depending on the level (local, State, regional, or national) at which the contexts are developed and on their intended uses. For most planning purposes, a synopsis of the written description of the historic context is sufficient.

Creating a Historic Context

Generally, historic contexts should not be constructed so broadly as to include all property types under a single historic context or so narrowly as to contain only one property type per historic context. The following procedures should be followed in creating a historic context.

1. Identify the concept, time period and geographical limits for the historic context

Existing information, concepts, theories, models, and descriptions should be used as the basis for defining historic contexts. Biases in primary and secondary sources should be identified and accounted for when existing information is used in defining historic contexts.

The identification and description of historic contexts should incorporate contributions from all disciplines involved in historic preservation. The chronological period and geographical area of each historic context should be defined after the conceptual basis is established. However, there may be exceptions, especially in defining prehistoric contexts where drainage systems or physiographic regions often are outlined first. The geographical boundaries for historic contexts should not be based upon contemporary political, project or other contemporary boundaries if those boundaries do not coincide with historical boundaries. For example, boundaries for prehistoric contexts will have little relationship to contemporary city, county or State boundaries.

2. Assemble the existing information about the historic context

a. Collecting information: Several kinds of information are needed to construct a preservation plan. Information about the history of the area encompassed by the historic context must be collected, including any information about historic properties that have already been identified. Existing survey or inventory entries are an important source of information about historic properties. Other sources may include literature on prehistory, history, architecture and the environment; social and environmental impact assessments; county and State land use plans; architectural and folklife studies and oral histories; ethnographic research; State historic inventories and registers; technical reports prepared for Section 106 or other assessments of historic properties; and direct consultation with individuals and organized groups.

In addition, organizations and groups that may have important roles in defining historic contexts and values should be identified. In most cases a range of knowledgeable professionals drawn from the preservation, planning and academic communities will be available to assist in defining contexts and in identifying sources of information. In other cases, however, development of historic contexts may occur in areas whose history or prehistory has not been extensively studied. In these situations, broad general historic contexts should be initially identified using available literature and expertise, with the expectation that the contexts will be revised and subdivided in the future as primary source research and field survey are conducted. It is also important to identify such sources of information as existing planning data, which is needed to establish goals for identification, evaluation, and treatment, and to identify factors that will affect attainment of those goals.

The same approach for obtaining information is not necessarily desirable for all historic contexts. Information should not be gathered without first considering its relative importance to the historic context, the cost and time involved, and the expertise required to obtain it. In many cases, for example, published sources may be used in writing initial definitions of historic contexts; archival research or field work may be needed for subsequent activities.

b. Assessing information: All information should be reviewed to identify bias in historic perspective, methodological approach, or area of coverage. For example, field surveys for archeological sites may have ignored historic archeological sites, or county land use plans may have emphasized only development goals.

3. Synthesize information

The information collection and analysis results in a written narrative of the historic context. This narrative provides a detailed synthesis of the data that have been collected and analyzed. The narrative covers the history of the area from the chosen perspective and identifies important patterns, events, persons, or cultural values. In the process of identifying the important patterns, one should consider:

a) Trends in area settlement and development, if relevant;

b) Aesthetic and artistic values embodied in architecture, construction technology or craftsmanship;

c) Research values or problems relevant to the historic context; social and physical sciences and humanities; and cultural interests of local communities; and

d) Intangible cultural values of ethnic groups and native American peoples.

4. Define property types

A property type is a grouping of individual properties based on shared physical or associative characteristics. Property types link the ideas incorporated in the theoretical historic context with actual historic properties that illustrate those ideas. Property types defined for each historic context should be directly related to the conceptual basis of the historic context. Property types defined for the historic context "Coal Mining in Northeastern Pennsylvania, 1860-1930" might include coal extraction and processing complexes; railroad and canal transportation systems; commercial districts; mine workers' housing; churches, social clubs and other community facilities reflecting the ethnic origins of workers; and residences and other properties associated with mine owners and other industrialists.

a. Identify property types: The narrative should discuss the kinds of properties expected within the geographical limits of the context and group them into those property types most useful in representing important historic trends.

Generally, property types should be defined after the historic context has been defined. Property types in common usage ("Queen Anne House," "mill buildings," or "stratified sites") should not be adopted without first verifying their relevance to the historic contexts being used.

b. Characterize the locational patterns of property types: Generalizations about where particular types of properties are likely to be found can serve as a guide for identification and treatment. Generalizations about the distribution of archeological properties are frequently used. The distribution of other historic properties often can be estimated based on recognizable historical, environmental, or cultural factors that determined their location. Locational patterns of property types should be based upon models that have an explicit theoretical or historical basis and can be tested in the field. The model may be the product of historical research and analysis ("Prior to widespread use of steam power, mills were located on rivers and streams able to produce water power" or "plantation houses in the Mississippi Black Belt were located on sandy clay knolls"), or it may result from sampling techniques. Often the results of statistically valid sample surveys can be used to describe the locational patterns of a representative portion of properties belonging to a particular property type. Other surveys can also provide a basis for suggesting locational patterns if a diversity of historic properties was recorded and a variety of environmental zones was inspected. It is likely that the identification of locational patterns will come from a combination of these sources. Expected or predicted locational patterns of property types should be developed with a provision made for their verification.

c. Characterize the current condition of property types: The expected condition of property types should be evaluated to assist in the development of identification, evaluation and treatment strategies, and to help define physical integrity thresholds for various property types. The following should be assessed for each property type:

(1) Inherent characteristics of a property type that either contribute to or detract from its physical preservation. For example, a property type commonly constructed of fragile materials is more likely to be deteriorated than a property type constructed of durable materials; structures whose historic function or design limits the potential for alternative uses (water towers) are less likely to be reused than structures whose design allows a wider variety of other uses (commercial buildings or warehouses).

(2) Aspects of the social and natural environment that may affect the preservation or visibility of the property type. For example, community values placed on certain types of properties (churches, historic cemeteries) may result in their maintenance while the need to reuse valuable materials may stimulate the disappearance of properties like abandoned houses and barns.

It may be most efficient to estimate the condition of property types based on professional knowledge of existing properties and field test these estimates using a small sample of properties representative of each type.

5. Identify information needs

Filling gaps in information is an important element of the preservation plan designed for each historic context. Statements of the information needed should be as specific as possible, focusing on the information needed, the historic context and property types it applies to, and why the information is needed to perform identification, evaluation, or treatment activities.

Developing Goals for a Historic Context

Developing Goals

A goal is a statement of preferred preservation activities, which is generally stated in terms of property types.

The purpose of establishing preservation goals is to set forth a "best case" version of how properties in the historic context should be identified, evaluated, registered and treated.

Preservation goals should be oriented toward the greatest possible protection of properties in the historic context and should be based on the principle that properties should be preserved in place if possible, through affirmative treatments like rehabilitation, stabilization or restoration. Generally, goals will be specific to the historic context and will often be phrased in terms of property types. Some of these goals will be related to information needs previously identified for the historic context. Collectively, the goals for a historic context should be a coherent statement of program direction covering all aspects of the context.

For each goal, a statement should be prepared identifying:

1. The goal, including the context and property types to which the goal applies and the geographical area in which they are located;
2. The activities required to achieve the goal;
3. The most appropriate methods or strategies for carrying out the activities;
4. A schedule within which the activities should be completed; and
5. The amount of effort required to accomplish the goal, as well as a way to evaluate progress toward its accomplishment.

Setting priorities for goals

Once goals have been developed they need to be ranked in importance. Ranking involves examining each goal in light of a number of factors.

1. General social, economic, political and environmental conditions and trends affecting (positively and negatively) the identification, evaluation, registration and treatment of property types in the historic context.

Some property types in the historic context may be more directly threatened by deterioration, land development patterns, contemporary use patterns, or public perceptions of their value, and such property types should be given priority consideration.

2. Major cost or technical considerations affecting the identification, evaluation and treatment of property types in the historic context.

The identification or treatment of some property types may be technically possible but the cost prohibitive; or techniques may not currently be perfected (for example, the identification of submerged sites or objects, or the evaluation of sites containing material for which dating techniques are still being developed).

3. Identification, evaluation, registration and treatment activities previously carried out for property types in the historic context.

If a number of properties representing one aspect of a historic context have been recorded or preserved, treatment of additional members of that property type may receive lower priority than treatment of a property type for which no examples have yet been recorded or preserved. This approach ensures that the focus of recording or preserving all elements of the historic context is retained, rather than limiting activities to preserving properties representing only some aspects of the context.

The result of considering the goals in light of these concerns will be a list of refined goals ranked in order of priority.

Integrating Individual Contexts–Creating the Preservation Plan

When historic contexts overlap geographically, competing goals and priorities must be integrated for effective preservation planning. The ranking of goals for each historic context must be reconciled to ensure that recommendations for one context do not contradict those for another. This important step results in an overall set of priorities for several historic contexts and a list of the activities to be performed to achieve the ranked goals. When applied to a specific geographical area, this is the preservation plan for that area.

It is expected that in many instances historic contexts will overlap geographically. Overlapping contexts are likely to occur in two combinations--those that were defined at the same scale (i.e., textile development in Smithtown 1850-1910 and Civil War in Smithtown 1855-1870) and those defined at different scales (i.e., Civil War in Smithtown and Civil War in the Shenandoah Valley). The contexts may share the same property types, although the shared property types will probably have different levels of importance, or they may group the same properties into different property types, reflecting either a different scale of analysis or a different historical perspective.

As previously noted, many of the goals that are formulated for a historic context will focus on the property types defined for that context. Thus it is critical that the integration of goals include the explicit consideration of the potential for shared property type membership by individual properties. For example, when the same property types are used by two contexts, reconciling the goals will require weighing the level of importance assigned to each property type. The degree to which integration of historic contexts must involve reconciling property types may be limited by the coordinated development of historic contexts used at various levels.

Integration with Management Frameworks

Preservation goals and priorities are adapted to land units through integration with other planning concerns. This integration must involve the resolution of conflicts that arise when competing resources occupy the same land base. Successful resolution of these conflicts can often be achieved through judicious combination of inventory, evaluation and treatment activities. Since historic properties are irreplaceable, these activities should be heavily weighted to discourage the destruction of significant properties and to be compatible with the primary land use.

Recommended Sources of Technical Information

Resource Protection Planning Process. State and Plans Grants Division, 1980. Washington, DC. Available from Heritage Preservation Services (2255), National Park Service, 1849 C Street NW, Washington, DC 20240. Outlines a step-by-step approach to implementing the resource protection planning process.

Resources Protection Planning Process Case Studies. Available from Heritage Preservation Services (2255), National Park Service, 1849 C Street NW, Washington, DC 20240. Reports prepared by State Historic Preservation Offices and others using the planning process.

Planning Theory. Andreas Faludi, 1980. Oxford: Pergamon Press. Constructs a model of planning using concepts borrowed from general systems theory.

Secretary of the Interior's Standards for Identification

Identification activities are undertaken to gather information about historic properties in an area. The scope of these activities will depend on: existing knowledge about properties; goals for survey activities developed in the planning process; and current management needs.

Standard I. Identification of Historic Properties Is Undertaken to the Degree Required To Make Decisions

Archival research and survey activities should be designed to gather the information necessary to achieve defined preservation goals. The objectives, chosen methods and techniques, and expected results of the identification activities are specified in a research design. These activities may include archival research and other techniques to develop historic contexts, sampling an area to gain a broad understanding of the kinds of properties it contains, or examining every property in an area as a basis for property specific decisions. Where possible, use of quantitative methods is important because it can produce an estimate, whose reliability may be assessed, of the kinds of historic properties that may be present in the studied area. Identification activities should use a search procedure consistent with the management needs for information and the character of the area to be investigated. Careful selection of methods, techniques and level of detail is necessary so that the gathered information will provide a sound basis for making decisions.

Standard II. Results of Identification Activities Are Integrated Into the Preservation Planning Process

Results of identification activities are reviewed for their effects on previous planning data. Archival research or field survey may refine the understanding of one or more historic contexts and may alter the need for additional survey or study of particular property types. Incorporation of the results of these activities into the planning process is necessary to ensure that the planning process is always based on the best available information.

Standard III. Identification Activities Include Explicit Procedures for Record-Keeping and Information Distribution

Information gathered in identification activities is useful in other preservation planning activities only when it is systematically gathered and recorded, and made available to those responsible for preservation planning. The results of identification activities should be reported in a format that summarizes the design and methods of the survey, provides a basis for others to review the results, and states where information on identified properties is maintained. However, sensitive information, like the location of fragile resources, must be safeguarded from general public distribution.

Secretary of the Interior's Guidelines for Identification

Introduction

These Guidelines link the Standards for Identification with more specific guidance and technical information. The Guidelines outline one approach to meet the Standards for Identification. Agencies, organizations and individuals proposing to approach identification differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

- Role of Identification in the Planning Process
- Performing Identification
- Integrating Identification Results
- Reporting Identification Results
- Recommended Sources of Technical Information

Role of Identification in the Planning Process

Identification is undertaken for the purpose of locating historic properties and is composed of a number of activities which include, but are not limited to archival research, informant interviews, field survey and analysis. Combinations of these activities may be selected and appropriate levels of effort assigned to produce a flexible series of options. Generally identification activities will have multiple objectives, reflecting complex management needs. Within a comprehensive planning process, identification is normally undertaken to acquire property-specific information needed to refine a particular historic context or to develop any new historic contexts. (See the Guidelines for Preservation Planning for discussion of information gathering to establish plans and develop historic contexts.) The results of identification activities are then integrated into the planning process so that subsequent activities are based on the most up-to-date information. Identification activities are also undertaken in the absence of a comprehensive planning process, most frequently as part of a specific land use or development project. Even lacking a formally developed preservation planning process, the benefits of efficient, goal-directed research may be obtained by the development of localized historic contexts, suitable in scale for the project areas, as part of the background research which customarily occurs before field survey efforts.

Performing Identification

Research Design

Identification activities are essentially research activities for which a statement of objectives or research design should be prepared before work is performed. Within the framework of a comprehensive planning process, the research design provides a vehicle for integrating the various activities performed during the identification process and for linking those activities directly to the goals and the historic context(s) for which those goals were defined. The research design stipulates the logical integration of historic context(s) and field and laboratory methodology. Although these tasks may be performed individually, they will not contribute to the greatest extent possible in increasing information on the historic context unless they relate to the defined goals and to each other. Additionally, the research design provides a focus for the integration of interdisciplinary information. It ensures that the linkages between specialized activities are real, logical and address the defined research questions. Identification activities should be guided by the research design and the results discussed in those terms. (See Reporting Identification Results.)

The research design should include the following:

1. *Objectives* of the identification activities. For example: to characterize the range of historic properties in a region; to identify the number of properties associated with a context; to gather information to determine which properties in an area are significant. The statement of objectives should refer to current knowledge about the historic contexts or property types, based on background research or assessments of previous research. It should clearly define the physical extent of the area to be investigated and the amount and kinds of information to be gathered about properties in the area.

2. *Methods* to be used to obtain the information. For example: archival research or field survey. Research methods should be clearly and specifically related to research problems.

Archival research or survey methods should be carefully explained so that others using the gathered information can understand how the information was obtained and what its possible limitations or biases are. The methods should be compatible with the past and present environmental character of the geographical area under study and the kinds of properties most likely to be present in the area.

3. *The expected results* and the reason for those expectations. Expectations about the kind, number, location, character and condition of historic properties are generally based on a combination of background research, proposed hypotheses, and analogy to the kinds of properties known to exist in areas of similar environment or history.

Archival Research

Archival or background research is generally undertaken prior to any field survey. Where identification is undertaken as part of a comprehensive planning process, background research may have taken place as part of the development of the historic contexts (see the Guidelines for Preservation Planning). In the absence of previously developed historic contexts, archival research should address specific issues and

topics. It should not duplicate previous work. Sources should include, but not be limited to, historical maps, atlases, tax records, photographs, ethnographies, folklife documentation, oral histories and other studies, as well as standard historical reference works, as appropriate for the research problem. (See the Guidelines for Historical Documentation for additional discussion.)

Field Survey

The variety of field survey techniques available, in combination with the varying levels of effort that may be assigned, give great flexibility to implementing field surveys. It is important that the selection of field survey techniques and level of effort be responsive to the management needs and preservation goals that direct the survey effort.

Survey techniques may be loosely grouped into two categories, according to their results. First are the techniques that result in the characterization of a region's historic properties. Such techniques might include "windshield" or walk-over surveys, with perhaps a limited use of sub-surface survey. For purposes of these Guidelines, this kind of survey is termed a "reconnaissance." The second category of survey techniques is those that permit the identification and description of specific historic properties in an area; this kind of survey effort is termed "intensive." The terms "reconnaissance" and "intensive" are sometimes defined to mean particular survey techniques, generally with regard to prehistoric sites. The use of the terms here is general and is not intended to redefine the terms as they are used elsewhere.

Reconnaissance survey might be most profitably employed when gathering data to refine a developed historic context–such as checking on the presence or absence of expected property types, to define specific property types or to estimate the distribution of historic properties in an area. The results of regional characterization activities provide a general understanding of the historic properties in a particular area and permit management decisions that consider the sensitivity of the area in terms of historic preservation concerns and the resulting implications for future land use planning. The data should allow the formulation of estimates of the necessity, type and cost of further identification work and the setting of priorities for the individual tasks involved. In most cases, areas surveyed in this way will require resurvey if more complete information is needed about specific properties.

A reconnaissance survey should document:

1. The kinds of properties looked for;
2. The boundaries of the area surveyed;
3. The method of survey, including the extent of survey coverage;
4. The kinds of historic properties present in the surveyed area;
5. Specific properties that were identified, and the categories of information collected; and
6. Places examined that did not contain historic properties.

Intensive survey is most useful when it is necessary to know precisely what historic properties exist in a given area or when information sufficient for later evaluation and treatment decisions is needed on individual historic properties. Intensive survey describes the distribution of properties in an area; determines the number, location and condition of properties; determines the types of properties actually present within the area; permits classification of individual properties; and records the physical extent of specific properties.

An intensive survey should document:

1. The kinds of properties looked for;
2. The boundaries of the area surveyed;
3. The method of survey, including an estimate of the extent of survey coverage;
4. A record of the precise location of all properties identified; and
5. Information on the appearance, significance, integrity and boundaries of each property sufficient to permit an evaluation of its significance.

Sampling

Reconnaissance or intensive survey methods may be employed according to a sampling procedure to examine less-than- the-total project or planning area.

Sampling can be effective when several locations are being considered for an undertaking or when it is desirable to estimate the cultural resources of an area. In many cases, especially where large land areas are involved, sampling can be done in stages. In this approach, the results of the initial large area survey are used to structure successively smaller, more detailed surveys. This "nesting" approach is an efficient technique since it enables characterization of both large and small areas with reduced effort. As with all investigative techniques, such procedures should be designed to permit an independent assessment of results.

Various types of sample surveys can be conducted, including, but not limited to: random, stratified and systematic. Selection of sample type should be guided by the problem the survey is expected to solve, the nature of the expected properties and the nature of the area to be surveyed.

Sample surveys may provide data to estimate frequencies of properties and types of properties within a specified area at various confidence levels. Selection of confidence levels should be based upon the nature of the problem the sample survey is designed to address.

Predictive modeling is an application of basic sampling techniques that projects or extrapolates the number, classes and frequencies of properties in unsurveyed areas based on those found in surveyed areas. Predictive modeling can be an effective tool during the early stages of planning an undertaking, for targeting field survey and for other management purposes. However, the accuracy of the model must be verified; predictions should be confirmed through field testing and the model redesigned and retested if necessary.

Special survey techniques

Special survey techniques may be needed in certain situations.

Remote sensing techniques may be the most effective way to gather background environmental data, plan more detailed field investigations, discover certain classes of properties, map sites, locate and confirm the presence of predicted sites, and define features within properties. Remote sensing techniques include aerial, subsurface and underwater techniques. Ordinarily the results of remote sensing should be verified through independent field inspection before making any evaluation or statement regarding frequencies or types of properties.

Integrating Identification Results

The results of identification efforts must be integrated into the planning process so that planning decisions are based on the best available information. The new information is first assessed against the objectives of the identification efforts to determine whether the gathered information meets the defined identification goals for the historic context(s); then the goals are adjusted accordingly. In addition, the historic context narrative, the definition of property types and the planning goals for evaluation and treatment are all adjusted as necessary to accommodate the new data.

Reporting Identification Results

Reporting of the results of identification activities should begin with the statement of objectives prepared before undertaking the survey. The report should respond to each of the major points documenting:

1. Objectives;
2. Area researched or surveyed;
3. Research design or statement of objectives;
4. Methods used, including the intensity of coverage. If the methods differ from those outlined in the statement of objectives, the reasons should be explained.
5. Results: how the results met the objectives; result analysis, implications and recommendations; where the compiled information is located.

A summary of the survey results should be available for examination and distribution. Identified properties should then be evaluated for possible inclusion in appropriate inventories.

Protection of information about archeological sites or other properties that may be threatened by dissemination of that information is necessary. These may include fragile archeological properties or properties such as religious sites, structures, or objects, whose cultural value would be compromised by public knowledge of the property's location.

Recommended Sources of Technical Information

The Archeological Survey: Methods and Uses. Thomas F. King. Interagency Archeological Services, U.S. Department of the Interior, 1978. Washington, D.C. Written primarily for the non-archeologist, this publication presents methods and objectives for archeological surveys.

Cultural Resources Evaluation of the Northern Gulf of Mexico Continental Shelf. National Park Service, U.S. Department of the Interior, 1977.

Guidelines for Local Surveys: A Basis for Preservation Planning. Anne Derry, H. Ward Jandl, Carol Shull and Jan Thorman. National Register Division, National Park Service, U.S. Department of the Interior, 1978. Washington, D.C. General guidance about designing and carrying out community surveys.

The Process of Field Research: Final Report on the Blue Ridge Parkway Folklife Project. American Folklife Center, 1981.

Regional Sampling in Archeology. David Hurst Thomas. University of California, Archeological Survey Annual Report, 1968-9, 11:87-100.

Remote Sensing: A Handbook for Archeologists and Cultural Resource Managers. Thomas R. Lyons and Thomas Eugene Avery. Cultural Resource Management Division, National Park Service, U.S. Department of the Interior, 1977.

Remote Sensing and Non-Destructive Archeology. Thomas R. Lyons and James L. Ebert, editors. Remote Sensing Division, Southwest Cultural Resources Center, National Park Service, U.S. Department of the Interior and University of New Mexico, 1978.

Remote Sensing Experiments in Cultural Resource Studies: Non-Destructive Methods of Archeological Exploration, Survey and Analysis. Thomas R. Lyons, assembler. Reports of the Chaco Center, Number One. National Park Service, U.S. Department of the Interior and University of New Mexico, 1976.

Sampling in Archeology. James W. Mueller, editor. University of Arizona Press, 1975. Tucson, Arizona.

Scholars as Contractors. William J. Mayer-Oakes and Alice W. Portnoy, editors. Cultural Resource Management Studies. U.S. Department of the Interior, 1979.

Sedimentary Studies of Prehistoric Archeological Sites. Sherwood Gagliano, Charles Pearson, Richard Weinstein, Diana Wiseman, and Christopher McClendon. Division of State Plans and Grants, National Park Service, U.S. Department of the Interior, 1982. Washington, D.C. Available from Coastal Environments Inc., 1260 Main Street, Baton Rouge, Louisiana 70802. Establishes and evaluates a method for employing sedimentological analysis in distinguishing site areas from non-site areas when identifying submerged archeological sites on the continental shelf.

State Survey Forms. Available from Heritage Preservation Services (2255), National Park Service, 1849 C Street NW, Washington, DC 20240. Characterizes cultural resource survey documentation methods in State Historic Preservation Offices.

Truss Bridge Types: A Guide to Dating and Identifying. Donald C. Jackson and T. Allan Comp. American Association for State and Local History, 1977. Nashville, Tennessee. Technical leaflet #95. Available from AASLH, 172 Second Avenue North, Nashville, Tennessee 37201. Information about performing surveys of historic bridges and identifying the types of properties encountered.

Secretary of the Interior's Standards for Evaluation

Evaluation is the process of determining whether identified properties meet defined criteria of significance and therefore should be included in an inventory of historic properties determined to meet the criteria. The criteria employed vary depending on the inventory's use in resource management.

Standard I. Evaluation of the Significance of Historic Properties Uses Established Criteria

The evaluation of historic properties employs criteria to determine which properties are significant. Criteria should therefore focus on historical, architectural, archeological, engineering and cultural values, rather than on treatments. A statement of the minimum information necessary to evaluate properties against the criteria should be provided to direct information gathering activities.

Because the National Register of Historic Places is a major focus of preservation activities on the Federal, State and local levels, the National Register criteria have been widely adopted not only as required for Federal purposes, but for State and local inventories as well. The National Historic Landmark criteria and other criteria used for inclusion of properties in State historic site files are other examples of criteria with different management purposes.

Standard II. Evaluation of Significance Applies the Criteria Within Historic Contexts

Properties are evaluated using a historic context that identifies the significant patterns that properties represent and defines expected property types against which individual properties may be compared. Within this comparative framework, the criteria for evaluation take on particular meaning with regard to individual properties.

Standard III. Evaluation Results in A List or Inventory of Significant Properties That Is Consulted In Assigning Registration and Treatment Priorities

The evaluation process and the subsequent development of an inventory of significant properties is an on-going activity. Evaluation of the significance of a property should be completed before registration is considered and before preservation treatments are selected. The inventory entries should contain sufficient information for subsequent activities such as registration or treatment of properties, including an evaluation statement that makes clear the significance of the property within one or more historic contexts.

Standard IV. Evaluation Results Are Made Available to the Public

Evaluation is the basis of registration and treatment decisions. Information about evaluation decisions should be organized and available for use by the general public and by those who take part in decisions about registration and treatment. Use of appropriate computer-assisted data bases should be a part of the information dissemination effort. Sensitive information, however, must be safeguarded from general public distribution.

Secretary of the Interior's Guidelines for Evaluation

Introduction

These Guidelines link the Standards for Evaluation with more specific guidance and technical information. These Guidelines describe one approach to meeting the Standards for Evaluation. Agencies, organizations, or individuals proposing to approach evaluation differently may wish to review their approach with the National Park Service.

The Guidelines are organized as follows:

- The Evaluation Process
- Criteria
- Inventory

- Recommended Sources of Technical Information

The Evaluation Process

These Guidelines describe principles for evaluating the significance of one or more historic properties with regard to a given set of criteria.

Groups of related properties should be evaluated at the same time whenever possible; for example, following completion of a theme study or community survey.

Evaluation should not be undertaken using documentation that may be out of date. Prior to proceeding with evaluation the current condition of the property should be determined and previous analyses evaluated in light of any new information.

Evaluation must be performed by persons qualified by education, training and experience in the application of the criteria. Where feasible, evaluation should be performed in consultation with other individuals experienced in applying the relevant criteria in the geographical area under consideration; for example, the State Historic Preservation Officer or local landmarks commission.

Evaluation is completed with a written determination that a property is or is not significant based on provided information. This statement should be part of the record.

Criteria

The purposes of evaluation criteria should be made clear. For example, the criteria may be used "to evaluate properties for inclusion in the county landmarks list," or "to implement the National Register of Historic Places program."

For Federal cultural resource management purposes, criteria used to develop an inventory should be coordinated with the National Register criteria for evaluation as implemented in the approved State comprehensive historic preservation plan.

Content of Criteria: Criteria should be appropriate in scale to the purpose of the evaluation. For example, criteria designed to describe national significance should not be used as the basis for creating a county or State inventory. Criteria should be categorical and not attempt to describe in detail every property likely to qualify. Criteria should outline the disciplines or broad areas of concern (history, archeology, architectural history, engineering and culture, for example) included within the scope of the inventory; explain what kinds of properties, if any, are excluded and the reasons for exclusion; and define how levels of significance are measured, if such levels are incorporated into the criteria. If the criteria are to be used in situations where the National Register criteria are also widely used, it is valuable to include a statement explaining the relationship of the criteria used to the National Register criteria, including how the scope of the inventory differs from that defined by the National Register criteria and how the inventory could be used to identify properties that meet the National Register criteria.

Information Needed to Evaluate Properties: The criteria should be accompanied by a statement defining the minimum information necessary to evaluate properties to insure that this information is collected during identification activities intended to locate specific historic properties. Generally, at least the following will be needed:

1. Adequately developed historic contexts, including identified property types. (See the Guidelines for Preservation Planning for discussion of development of historic contexts.)

2. Sufficient information about the appearance, condition and associative values of the property to be evaluated to:

a) Classify it as to property type;

b) Compare its features or characteristics with those expected for its property type; and

c) Define the physical extent of the property and accurately locate the property.

To facilitate distinguishing between facts and analysis, the information should be divided into categories including identification and description of pertinent historical contexts; description of the property and its significance in the historical context; and analysis of the integrity of the property relative to that needed to represent the context.

Usually documentation need not include such items as a complete title history or biography of every owner of a property, except where that information is important in evaluating its significance. Information on proposed or potential treatments or threats, such as destruction of a property through uncontrollable natural processes, is also not needed for evaluation, unless those effects are likely to occur prior to or during the evaluation, thereby altering the significant characteristic of the property. If archeological testing or structural analysis is needed for evaluation, it should not proceed beyond the point of providing the information necessary for evaluation and should not unnecessarily affect significant features or values of the property.

When more information is needed: Evaluation cannot be conducted unless all necessary information is available. (See Information Needed to Evaluate Properties.) Any missing information or analysis should be identified (e.g. development of context or information on the property) as well as the specific activities required to obtain the information (archival research, field survey and testing, or laboratory testing). When adequate information is not available, it is important to record that fact so that evaluation will not be undertaken until the information can be obtained. In some cases needed information is not obtainable, for example, where historical records have been destroyed or analytical techniques have not been developed to date materials in archeological sites. If an evaluation must be completed in these cases, it is important to acknowledge what information was not obtainable and how that missing information may affect the reliability of the evaluation.

Application of the Criteria within a Historic Context

The first step in evaluation is considering how the criteria apply to the particular historic context. This is done by reviewing the previously developed narrative for the historic context and determining how the criteria would apply to properties in that context, based on the important patterns, events, persons and cultural values identified. (See the discussion of the historic context narrative in the Guidelines for Preservation Planning.) This step includes identification of which criteria each property type might meet and how integrity is to be evaluated for each property type under each criterion. Specific guidelines for evaluating the eligibility of individual properties should be established. These guidelines should outline and justify the specific physical characteristics or data requirements that an individual property must possess to retain integrity for the particular property type; and define the process by which revisions or additions can be made to the evaluation framework.

Consideration of property type and integrity: After considering how the criteria apply to the particular historic context, the evaluation process for a property generally includes the following steps:

1. A property is classified as to the appropriate historic context(s) and property type(s). If no existing property type is appropriate, a new property type is defined, its values identified, and the specific characteristics or data requirements are outlined and justified as an addition to the historic context. If necessary, a new historic context is defined for which values and property types and their integrity requirements are identified and justified.

2. A comparison is made between the existing information about the property and the integrity characteristics or data required for the property type.

a. If the comparison shows that the property possesses these characteristics, then it is evaluated as significant for that historic context. The evaluation includes a determination that the property retains integrity for its type.

b. If the comparison shows that the property does not meet the minimum requirements, one of several conclusions is reached:

(1) The property is determined not significant because it does not retain the integrity defined for the property type.

(2) The property has characteristics that may make it significant but these differ from those expected for that property type in that context. In this case, the historic context or property types should be reexamined and revised if necessary, based on subsequent research and survey.

The evaluation should state how the particular property meets the integrity requirements for its type. When a property is disqualified for loss of integrity, the evaluation statement should focus on the kinds of integrity expected for the property type, those that are absent for the disqualified property, and the impact of that absence on the property's ability to exemplify architectural, historical or research values within a particular historic context.

The integrity of the property in its current condition, rather than its likely condition after a proposed treatment, should be evaluated. Factors such as structural problems, deterioration, or abandonment should be considered in the evaluation only if they have affected the integrity of the significant features or characteristics of the property.

Inventory

An inventory is a repository of information on specific properties evaluated as significant.

Content: The inventory should include:

1. Summaries of the important historic contexts. These may be in the form of an approved plan or analysis of historic contexts important in the history of the geographical area covered by the inventory.

2. Descriptions of significant property types of these contexts, whether or not any specific properties have been identified.

3. Results of reconnaissance surveys or other identification activities, even if the level of information on specific properties identified as part of those activities is not sufficient to evaluate individual properties.

4. Information on individual properties that was used in evaluation.

- Historic contexts are identified by name, with reference to documents describing those contexts, or with a narrative statement about the context(s) where such documents do not exist.
- A description of the property. Part of this description may be a photographic record.
- A statement that justifies the significance of the property in relation to its context(s). This statement should include an analysis of the integrity of the property.
- Boundaries of the property.
- A record of when a property was evaluated and included in the inventory, and by whom.
- Records on demolished or altered properties and properties evaluated as not significant should be retained, along with full description of areas surveyed, for the planning information these records provide about impacts to properties and about the location and character of non-significant properties to prevent redundant identification work at a later time.

Maintenance: Inventory entries should be maintained so that they accurately represent what is known about historic properties in the area covered by the inventory. This will include new information gained from research and survey about the historic contexts, property types, and previously evaluated properties, as well as information about newly evaluated properties. For individual properties, addition of kinds of significance, change in the boundaries, or loss of significance through demolition or alteration should be recorded.

Uses and Availability: An inventory should be managed so that the information is accessible. Its usefulness depends on the organization of information and on its ability to incorporate new information. An inventory should be structured so that entries can be retrieved by locality or by historic context.

The availability of the inventory information should be announced or a summary should be distributed. This may be in the form of a list of properties evaluated as significant or a summary of the historic contexts and

the kinds of properties in the inventory. Inventories should be available to managers, planners, and the general public at local, State, regional, and Federal agency levels.

It is necessary to protect information about archeological sites or other properties whose integrity may be damaged by widespread knowledge of their location. It may also be necessary to protect information on the location of properties such as religious sites, structures, or objects whose cultural value would be compromised by public knowledge of the property's location.

Recommended Sources of Technical Information

How to Apply the National Register Criteria. Available from National Register, History & Education (2280), National Park Service, 1849 C Street NW, Washington, DC 20240. Provides detailed technical information about interpretation of the significance and integrity criteria used by the National Register of Historic Places program.

How To Series. Available from National Register, History & Education (2280), National Park Service, 1849 C Street NW, Washington, DC 20240. Discusses application of the National Register criteria for evaluation. Titles include: *How To Establish Boundaries for National Register Properties*; *How To Evaluate and Nominate Potential National Register Properties That Have Achieved Significance Within the Last 50 Years*; *How To Improve Quality of Photos for National Register Nominations*; *How to Apply for Certification of Significance Under Section 2124 of the Tax Reform Act of 1976*; *How To Apply for Certification of State and Local Statutes and Historic Districts*; *How To Qualify Historic Properties Under the New Federal Law Affecting Easements*.

Importance of Small, Surface, and Disturbed Sites as Sources of Significant Archeological Data. Valerie Talmage and Olga Chesler. Interagency Archeological Service, 1977. Washington, D.C. Available from the National Technical Information Service. NTIS Publication Number PB 270939/AS. Discusses the role of small, surface, and disturbed sites as sources of significant information about a variety of prehistoric activities. These types of sites are frequently ignored in the development of regional archeological research designs.

Secretary of the Interior's Standards For Registration

Registration is the formal recognition of properties evaluated as significant. Preservation benefits provided by various registration programs range from honorific recognition to prohibition of demolition or alteration of included properties. Some registration programs provide recognition and other broad benefits while other programs authorize more specific forms of protection.

Standard I. Registration Is Conducted According To Stated Procedures

Registration of historic properties in the National Register of Historic Places must be done in accordance with the National Register regulations published in the Code of Federal Regulations, 36 CFR 60. Registration for other lists or purposes follow an established process that is understood by the public, particularly by those interests that may be affected by registration.

Standard II. Registration Information Locates, Describes and Justifies the Significance and Physical Integrity of a Historic Property

Registers are used for planning, research and treatment. They must contain adequate information for users to locate a property and understand its significance. Additional information may be appropriate depending on the intended use of the register.

Standard III. Registration Information Is Accessible to the Public

Information should be readily available to the public and to government agencies responsible for the preservation of historic properties and for other planning needs.

Secretary of the Interior's Guidelines for Registration

Introduction

These Guidelines link the Standards for Registration with more specific guidance and technical information. They describe one approach to meeting the Standards for Registration. Agencies, organizations, or individuals proposing to approach registration differently may wish to review their approach with the National Park Service.

The Guidelines are organized as follows:

- Purpose of Registration Programs
- Registration Procedures
- Documentation on Registered Properties
- Public Availability
- Recommended Sources of Technical Information

Purpose of Registration Programs

Registration of historic properties is the formal recognition of properties that have been evaluated as significant according to written criteria. Registration results in an official inventory or list that serves an administrative function. A variety of benefits or forms of protection accrue to a registered property, ranging from honorific recognition to prohibition of demolition or alteration.

Some registration programs provide recognition and other broad benefits or entitlement, while other registrations of properties may, in addition, authorize more specific forms of protection. The application of the registration process should be a logical outgrowth of the same planning goals and priorities that guided the identification and evaluation activities. All registration programs should establish priorities for recognition of their authorized range of properties; provide for confidentiality of sensitive information; and establish a means of appealing the registration or non-registration of a property.

Registration Procedures

Explicit procedures are essential because they are the means by which the public can understand and participate in the registration process. Procedures for registration programs should be developed by professionals in the field of historic preservation, in consultation with those who will use or be affected by the program. Prior to taking effect, procedures should be published or circulated for comment at the governmental level at which they will be used. (Procedures for registration of properties in the National Register of Historic Places and the National Historic Landmarks list, for example, are published in the Federal Register.)

Any registration program should include:

1. A professional staff to prepare or assess the documentation;
2. A professional review, independent of the nominating source, to provide an impartial evaluation of the documented significance;
3. Adequate notice to property owners, elected officials and the public about proposed registrations and the effects of listing, if any; and
4. A means of public participation.

Professional Review: The registration process should include an independent evaluation of the significance of the property and of the quality and thoroughness of the documentation supporting that significance. Such evaluation ensures that significance is adequately justified and that registration documentation meets the technical requirements of the registration process.

State and local preservation programs, concerned with both public and private properties, generally use a review board, panel or commission. This level of professional review has proven to be effective in assessing the significance of properties considered for registration.

Review boards and other forms of independent review should include professionals in the fields or disciplines included in the criteria; representatives of other fields or disciplines may be desirable to reflect other values or aspects of the register. Key personnel must be qualified by education, training or experience to accomplish their designated duties. (See the Professional Qualifications Standards.)

The scope of the independent review should be clearly stated in the registration procedures and should not include issues outside the scope of the applicable criteria for evaluation and other areas specified in the procedures. Generally, independent reviewers should not be involved in any primary research or analysis related to properties under consideration; this information should be gathered and organized prior to review meetings. Documentation presented to the reviewers should be made available to the public prior to review meetings or public hearings. Registration of properties should not take place until review of documentation has been completed.

Public Notice: Adequate notice allows property owners, officials and other interested parties to comment on proposed registrations prior to action by the independent reviewers. The degree of protection and control provided by a registration program may be a factor in determining what constitutes adequate notice. For example, adequate notice of proposed inclusion in honorific registers may be less complex than that for registration that results in local controls on alteration or demolition of registered properties.

Notice to elected officials and the public is necessary to distribute information about potential registrations of concern to planning and development interests.

Adequate notice to property owners may be accomplished through means ranging from individual notification by mail to publication of a public notice, depending on the nature of the registration program and the number and character of the properties involved.

Public notices and owner notification about proposed registrations should include the dates and times of public meetings and review meetings, the kinds of comments that are appropriate, and how comments will be considered in the evaluation process. The notice should also state where information can be obtained about the registration program, the criteria used to evaluate properties for inclusion, and the significance of specific properties under consideration.

The procedures should include a means of public participation in the form of submission of written comments or a review meeting open to the public or a public hearing.

The procedures should state time periods within which reviews, notices, comments, public hearings, review meetings and appeals will occur. The time periods should be short enough to allow for efficient recognition of historic properties but also allow adequate time for public comment and participation by those affected. Time periods may vary depending on whether activities are carried out at the local, State, or national level. These time schedules should be widely circulated so that the process is widely understood.

Appeal Process: A means of appeal should be included in the registration process to allow for reconsideration of a property's inclusion. Reasons for appeal may range from existence of additional information about the property supporting or refuting its significance to administrative or procedural error. An appeal process should specify to whom an appeal may be made and how the information that is provided will be evaluated. The appeal procedures should also state the time limit, if any, on appealing a decision and on consideration of information and issuance of a decision by the appeal authority.

Documentation on Registered Properties

Documentation requirements should be carefully weighed to provide the information actually needed to reach a registration decision and should be made public. It should be made certain that identification and evaluation activities obtain and record the information necessary for registration. Documentation should be prepared in a standardized format and on materials that are archivally stable and easy to store and retrieve.

Location: The precise location of a historic property must be clearly identified.

Street address, town or vicinity, and county should be provided. Properties should also be located on maps; these may be USGS maps, county planning maps, or city base maps or real estate maps. A uniform system of noting location, such as UTM grid points or longitude and latitude, should supplement mapping. It is recommended that each registration process standardize the preferred choice of maps appropriate to the scope of the process.

Description: An accurate description of a property includes a description of both the current and historical physical appearance and condition of the property and notes the relevant property type(s) for the applicable historic context(s). Discussion should include alterations, deterioration, relocation and other changes to the property since its period of significance.

Significance: A statement of significance should explain why a property meets the criteria for inclusion in the register to which it has been nominated.

This statement should contain at least 3 elements:

1. Reference to the relevant historic context(s);
2. Identification of relevant property types within the context and their characteristics; and
3. Justification that the property under consideration has the characteristics required to qualify it.

Relevant historic contexts can be identified through reference to the preservation plan or other documents where the contexts have been previously described or can be provided by a narrative discussion of the context. (The development of contexts and their use in evaluating properties are discussed in the Guidelines for Preservation Planning and the Guidelines for Evaluation.) A significant property type and its characteristics are identified either through reference to the historic context(s) or by a narrative in the documentation that describes historic contexts. Justification of a specific property is made by systematic comparison of its characteristics to those required for the property type.

Boundaries: The delineation and justification of boundaries for a registered property are important for future treatment activities. It is especially critical when legal restraints or restrictions may result from the registration of properties. Thus, boundaries should correspond as closely as possible to the actual extent and configuration of the property and should be carefully selected to encompass, but not exceed, the extent of the significant resource(s). The selection of boundaries should reflect the significant aspects of the property.

Arbitrary boundaries should not be chosen for ease of description since this can result in the inclusion of unrelated land or in exclusion of a portion of the historic property. Present property lines should not be chosen as property boundaries without careful analysis of whether they are appropriate to the historic property. A single uniform boundary description and acreage should not be applied to a group or class of properties (antebellum plantations, for example) without examination of the actual extent of each property. The selected boundaries should be justified as appropriate to the historic property.

Boundaries should be clearly and precisely described, using a verbal boundary description, legal description, accurate sketch map, or lines drawn on base maps, or a combination of these where needed to specify the limits of the property being registered. When used, maps should show the location of buildings, structures, sites or objects within the boundary.

Updating Information on Registered Properties: A change in the condition of the significant features of a property may require a change in the official registration record. Alteration of a significant architectural feature, for example, could mean that a property is no longer significant for its architectural design.

Additional significance of registered properties may be identified through development of new historic contexts. Research may reveal that a property is significant in other historic contexts or is significant at a higher level. For example, a property previously recognized as of local significance could be found to be of national significance.

A change in location or condition of a registered property may mean that the property is no longer significant for the reasons for which it was registered and the property should be deleted from the registered list.

Public Availability

Lists of registered properties should be readily available for public use, and information on registered properties should be distributed on a regular basis. Lists of properties registered nationally are distributed through publication in the Federal Register and to Congressional Offices and State Historic Preservation Offices. Comprehensive information should be stored and maintained for public use at designated national, State and local authorities open to the public on a regular basis.

Information should be retrievable by the property name, and location, historic context or property type. The specific location of properties that may be threatened by dissemination of that information must be withheld. These may include fragile archeological properties or properties such as religious sites, structures, or objects whose cultural value would be compromised by public knowledge of the property location.

Recommended Sources of Technical Information

How to Complete National Register Forms. National Register Branch, National Park Service, U.S. Department of the Interior, 1977. Washington, D.C. This publication is the standard reference on the documentation requirements of the National Register of Historic Places program.

How To Series. Available from National Register, History & Education (2280), National Park Service, 1849 C Street NW, Washington, DC 20240. These information sheets contain supplementary information about interpreting the National Register criteria for evaluation and documentation requirements of the National Register registration program. Titles include: *How To Establish Boundaries for National Register Properties*; *How To Evaluate and Nominate Potential National Register Properties That Have Achieved Significance Within the Last 50 Years*; *How To Improve the Quality of Photographs for National Register Nominations*; *How To Apply for Certification of Significance Under Section 2124 of the Tax Reform Act of 1976*; *How To Apply for Certification of State and Local Statutes and Historic Districts*; *How To Qualify Historic Properties Under the New Federal Law Affecting Easements*.

Note on Documentation and Treatment of Historic Properties

Documentation and treatment of historic properties includes a variety of techniques to preserve or protect properties, or to document their historic values and information. While documentation activities may be applied to any potentially historic property, generally only those properties that first have been evaluated as significant against specified criteria (such as those of the National Register) are treated. Some commonly applied treatments are preservation in place, rehabilitation, restoration and stabilization; there are other types of treatments also. Documentation and treatment may be applied to the same property; for example, archeological, historical, and architectural documentation may be prepared before a structure is stabilized or before foundations or chimneys or other lost features are reconstructed.

Alternatives for treatment will usually be available, and care should be applied in choosing among them. Preservation in place is generally preferable to moving a property. Over time, the preferred treatment for a property may change; for example, an archeological site intended for preservation in place may begin to erode so that a combination of archeological documentation and stabilization may be required. If a decision is made that a particular property will not be preserved in place, the need for documentation must then be considered.

The three sets of documentation standards (i.e., the Standards for Historical Documentation, Standards for Architectural and Engineering Documentation, and Standards for Archeological Documentation) as well as the Standards for Treatment of Historic Properties (Preservation, Rehabilitation, Restoration, and Reconstruction) describe the techniques of several disciplines to treat historic properties, and to document or preserve information about their historical values. The integration of planning for documentation and treatment with their execution is accomplished in a statement of objectives, or research design. Because both the goals and appropriate methodologies are likely to be interdisciplinary in nature, the relationship among these various activities should be specified in the research design to ensure that the resulting documentation produces a comprehensive record of historic properties in an efficient manner.

Secretary of the Interior's Standards for Historical Documentation

Historic documentation provides important information related to the significance of a property for use by historians, researchers, preservationists, architects, and historical archeologists. Research is used early in planning to gather information needed to identify and evaluate properties. (These activities are discussed in the Standards and Guidelines for Preservation Planning and the Standards and Guidelines for Identification.) Historical documentation is also a treatment that can be applied in several ways to properties previously evaluated as significant; it may be used in conjunction with other treatment activities (as the basis for rehabilitation plans or interpretive programs, for example) or as a final treatment to preserve information in cases of threatened property destruction. These Standards concern the use of research and documentation as a treatment.

Standard I. Historical Documentation Follows a Research Design That Responds to Needs Identified in the Planning Process

Historical documentation is undertaken to make a detailed record of the significance of a property for research and interpretive purposes and for conservation of information in cases of threatened property destruction. Documentation must have defined objectives so that proposed work may be assessed to determine whether the resulting documentation will meet needs identified in the planning process. The research design or statement of objectives is a formal statement of how the needs identified in the plan are to be addressed in a specific documentation project. This is the framework that guides the selection of methods and evaluation of results, and specifies the relationship of the historical documentation efforts to other proposed treatment activities.

Standard II. Historical Documentation Employs an Appropriate Methodology to Obtain the Information Required by The Research Design

Methods and techniques of historical research should be chosen to obtain needed information in the most efficient way. Techniques should be carefully selected and the sources should be recorded so that other researchers can verify or locate information discovered during the research.

Standard III. The Results of Historical Documentation Are Assessed Against the Research Design and Integrated Into the Planning Process

Documentation is one product of research; information gathered about the usefulness of the research design itself is another. The research results are assessed against the research design to determine how well they meet the objectives of the research. The results are integrated into the body of current knowledge and reviewed for their implications for the planning process. The research design is reviewed to determine how future research designs might be modified based on the activity conducted.

Standard IV. The Results of Historical Documentation Are Reported and Made Available to the Public

Research results must be accessible to prospective users. Results should be communicated to the professional community and the public in reports summarizing the documentation activity and identifying the repository of additional detailed information. The goal of disseminating information must be balanced, however, with the need to protect sensitive information whose disclosure might result in damage to properties.

Secretary of the Interior's Guidelines for Historical Documentation

Introduction

These Guidelines link the Standards for Historical Documentation with more specific guidance and technical information. They describe one approach to meeting the Standards for Historical Documentation. Agencies, organizations or individuals proposing to approach historical documentation differently may wish to review their approaches with the National Park service.

The Guidelines are organized as follows:

- Historical Documentation Objectives
- Research Design
- Methods
- Integrating Results
- Reporting Results
- Recommended Sources of Technical Information

Documentation Objectives

Documentation is a detailed record, in the form of a report or other written document, of the historical context(s) and significance of a property. Historical research to create documentation uses archival materials, oral history techniques, ethnohistories, prior research contained in secondary sources and other sources to make a detailed record of previously identified values or to investigate particular questions about the established significance of a property or properties. It is an investigative technique that may be employed to document associative, architectural, cultural or informational values of properties. It may be used as a component of structural recording or archeological investigation, to enable interpretation or to mitigate the anticipated loss of a property through conservation of information about its historical, architectural or archeological significance. Documentation generally results in both greater factual knowledge about the specific property and its values, and in better understanding of the property in its historical context. In addition to increasing factual knowledge about a property and its significance in one historical context, documentation may also serve to link the property to or define its importance in other known or yet-to-be defined historic contexts.

Documentation should incorporate, rather than duplicate, the findings of previous research. Research may be undertaken to identify how a particular property fits into the work of an architect or builder; to analyze the historical relationship among several properties; or to document in greater detail the historical contexts of properties. The kinds of questions investigated will generally depend on what is already known or understood and what information is needed. For example, documentation of a bridge whose technological significance is well understood, but whose role in local transportation history is not, would summarize the information on the former topic and focus research on the associative values of the property. The questions that research seeks to answer through deed, map or archival search, oral history and other techniques may also relate to issues addressed in structural documentation or archeological investigation; for example, the reasons for and history of modification of a building to be the subject of architectural or engineering documentation.

Research Design

Historical documentation is guided by a statement of objectives, research design or task directive prepared before research is performed. The research design is a useful statement of how proposed work will enhance existing archival data and permits comparison of the proposed work with the results. The purpose of the research design is to define the proposed scope of the documentation work and to define a set of expectations based on the information available prior to the research. Generally, the research design also ensures that research methods are commensurate with the type, quality and source of expected information. The research design for a property should identify:

1. Evaluated significance of the property(ies) to be investigated;
2. Historical, architectural, archeological or cultural issues relevant to the evaluated significance of the property;
3. Previous research on those issues and how the proposed work is related to existing knowledge;
4. The amount and kinds of information required to produce reliable historical analyses;
5. Methods to be used to obtain the information;
6. Types of sources to be investigated; types of personnel required;

7. Expected results or findings based on available knowledge about the property and its context; and
8. Relationship of the proposed historical documentation to other proposed treatment activities; for example, recommendations on the use of documentation in interpretive programs or other aspects of treatment such as anticipated architectural, engineering or archeological documentation.

Research Methods

Research methods should be chosen based on the information needs, be capable of replication and be recorded so that another researcher could follow the same research procedure. Sources should be recorded so that other researchers can locate or verify the information discovered during the search.

Use of Sources: The variety of available written and graphic materials and the number of individuals that can serve as sources, including but not limited to personal records, deed and title books, newspapers, plats, maps, atlases, photographs, vital records, censuses, historical narratives, interviews of individuals and secondary source materials, should be considered in developing the research design. Part of the development of the research design is deciding what kinds of source materials are most likely to contain needed information and at what point in the research process that information will be most valuable. For example, often secondary sources are most valuable for gathering background information, while primary sources are more useful to gather or confirm specific facts. The documentation goals may not require exhaustive investigation of sources, such as deed records or building permits. Research may be kept cost-effective by making careful decisions about when to use particular sources, thereby limiting the use of time-consuming techniques to when absolutely necessary. Decisions about when to gather information may also affect the quality of information that can be gathered. When dealing with large project areas where loss of many properties is anticipated, it is important to gather information from local archival sources and oral histories before project activities destroy or disperse family or community records and residents.

Analysis of the accuracy and biases of source materials is critical in analyzing the information gathered from these sources. Maps, historical atlases and insurance maps should be assessed like written records for errors, biases and omissions; for example, some map sources may omit structures of a temporary nature or may not fully depict ethnic or minority areas. Likewise, building plans and architectural renderings may not reflect a structure as it was actually built.

Analysis: Analysis should not only focus on the issues defined in the research design, but should also explore major new issues identified during the course of research or analysis. The documentation gathered may raise important issues not previously considered, and further investigation may be important, particularly when contradictory information has been gathered. It is important to examine the implications of these new issues to ensure that they are investigated in a balanced way.

Questions that should be considered in analyzing the information include:

- Has enough information been gathered to answer the questions that were posed?
- Do the answers contradict one another? If so, it may be necessary to search for more evidence. If no additional evidence is available, judgments must be based on the available sources, weighing their biases. Conflicts of source materials should be noted.

In general, the more the researcher knows about the general historical period and setting and limitations of the source materials under investigation, the better the individual is prepared to evaluate the information found in the documentary sources investigated. Peer review or consultation with other knowledgeable individuals about the information and the tentative conclusions can be an important part of the analysis.

Integrating Results

The results of documentation must be integrated into the planning process so that planning decisions are based on the best available information. The new information is first assessed against the research design to determine whether the gathered information meets the defined objectives of the research. Then the relevant historic contexts, property types, and treatment goals for those contexts are all adjusted, as necessary, based on the historical documentation results.

Reporting Results

Reports should contain:

1. Summaries of the purpose of the documentation, the research design and methods and techniques of investigation.
2. Sources of facts or analyses so that other researchers can locate the information in its original context. Notation of any conflicts in source materials and how the individual performing the documentation interpreted these conflicts.
3. Sources consulted, including those expected to contain useful information and those that contained no information about the property(ies).
4. Assessment of the accuracy, biases and historical perspective of all sources. This information and that identified in No. 3 may be provided in an annotated bibliography.
5. Discussion of major analyses and results, including conclusions regarding all major research issues identified in the research design, as well as important issues raised in the course of research. The analysis should be summarized in terms of its impact on interpreting the property's significance and expanding or altering the knowledge about the property and its context.
6. Researchers' interpreting of historical events or trends. These interpretations should be clearly identified.

Primary results should be preserved and made accessible in some manner, although they need not necessarily be contained in the report. At minimum, the report should reference the location of notes and analyses.

Results of historic documentation should be made available for use in preservation planning and by the general public. Report formats may vary, depending on the audience and the anticipated uses of the documentation, but professionally accepted rules of report writing should be followed. If reports are of a technical nature, the format of the major scientific journal of the pertinent discipline may be the most appropriate format. Peer review of draft reports is one means of ensuring that state-of-the-art technical reports are produced.

Recommended Sources of Technical Information

Folklife and Fieldwork: A Layman's Introduction to Field Techniques. Peter Bartis. American Folklife Center, Washington, DC, 1979.

Ordinary People and Everyday Life: Perspectives on the New Social History. James B. Gardner and George Rollie Adams, editors. American Association for State and Local History, Nashville, Tennessee, 1983.

The Process of Field Research. Carl Fleischhauer and Charles K. Wolfe. American Folklife Center, Washington, D.C., 1981.

Researching Heritage Buildings. Margaret Carter. Ministry of the Environment, Ottawa, Canada, 1983.

Secretary of the Interior's Standards for Architectural and Engineering Documentation

These standards concern the development of documentation for historic buildings, sites, structures and objects. This documentation, which usually consists of measured drawings, photographs and written data, provides important information on a property's significance for use by scholars, researchers, preservationists, architects, engineers and others interested in preserving and understanding historic properties. Documentation permits accurate repair or reconstruction of parts of a property, records existing conditions for easements, or may preserve information about a property that is to be demolished.

These Standards are intended for use in developing documentation to be included in the Historic American Building Survey (HABS) and the Historic American Engineering Record (HAER) Collections in the Library of Congress. HABS/HAER, in the National Park Service, have defined specific requirements for meeting

these Standards for their collections. The HABS/HAER requirements include information important to development of documentation for other purposes such as State or local archives.

Standard I. Documentation Shall Adequately Explicate and Illustrate What is Significant or Valuable About the Historic Building, Site, Structure or Object Being Documented.

The historic significance of the building, site, structure or object identified in the evaluation process should be conveyed by the drawings, photographs and other materials that comprise documentation. The historical, architectural, engineering or cultural values of the property together with the purpose of the documentation activity determine the level and methods of documentation. Documentation prepared for submission to the Library of Congress must meet the HABS/HAER Guidelines.

Standard II. Documentation Shall be Prepared Accurately From Reliable Sources With Limitations Clearly Stated to Permit Independent Verification of the Information.

The purpose of documentation is to preserve an accurate record of historic properties that can be used in research and other preservation activities. To serve these purposes, the documentation must include information that permits assessment of its reliability.

Standard III. Documentation Shall be Prepared on Materials That are Readily Reproducible, Durable and in Standard Sizes.

The size and quality of documentation materials are important factors in the preservation of information for future use. Selection of materials should be based on the length of time expected for storage, the anticipated frequency of use and a size convenient for storage.

Standard IV. Documentation Shall be Clearly and Concisely Produced.

In order for documentation to be useful for future research, written materials must be legible and understandable, and graphic materials must contain scale information and location references.

Secretary of the Interior's Guidelines for Architectural and Engineering Documentation

Introduction

These Guidelines link the Standards for Architectural and Engineering Documentation with more specific guidance and technical information. They describe one approach to meeting the Standards for Architectural Engineering Documentation. Agencies, organizations or individuals proposing to approach documentation differently may wish to review their approaches with the National Park Service.

The Guidelines are organized as follows:

- Definitions
- Goal of Documentation
- The HABS/HAER Collections
- Standard I: Content
- Standard II: Quality
- Standard III: Materials
- Standard IV: Presentation
- Architectural and Engineering Documentation Prepared for Other Purposes
- Recommended Sources of Technical Information

Definitions

These definitions are used in conjunction with these Guidelines:

Architectural Data Form–a one page HABS form intended to provide identifying information for accompanying HABS documentation.

Documentation–measured drawings, photographs, histories, inventory cards or other media that depict historic buildings, sites, structures or objects.

Field Photography–photography, other than large-format photography, intended for the purpose of producing documentation, usually 35mm.

Field Records–notes of measurements taken, field photographs and other recorded information intended for the purpose of producing documentation.

Inventory Card–a one page form which includes written data, a sketched site plan and a 35mm contact print dry-mounted on the form. The negative, with a separate contact sheet and index should be included with the inventory card.

Large Format Photographs–photographs taken of historic buildings, sites, structures or objects where the negative is a 4 X 5", 5 X 7" or 8 X 10" size and where the photograph is taken with appropriate means to correct perspective distortion.

Measured Drawings–drawings produced on HABS or HAER formats depicting existing conditions or other relevant features of historic buildings, sites, structures or objects. Measured drawings are usually produced in ink on archivally stable material, such as mylar.

Photocopy–A photograph, with large format negative, of a photograph or drawing.

Select Existing Drawings–drawings of historic buildings, sites, structures or objects, whether original construction or later alteration drawings that portray or depict the historic value or significance.

Sketch Plan–a floor plan, generally not to exact scale although often drawn from measurements, where the features are shown improper relation and proportion to one another.

Goal of Documentation

The Historic American Buildings Survey (HABS) and Historic American Engineering Record (HAER) are the national historical architectural and engineering documentation programs of the National Park Service that promote documentation incorporated into the HABS/HAER collections in the Library of Congress. The goal of the collections is to provide architects, engineers, scholars, and interested members of the public with comprehensive documentation of buildings, sites, structures and objects significant in American history and the growth and development of the built environment.

The HABS/HAER Collections

HABS/HAER documentation usually consists of measured drawings, photographs and written data that provide a detailed record which reflects a property's significance. Measured drawings and properly executed photographs act as a form of insurance against fires and natural disasters by permitting the repair and, if necessary, reconstruction of historic structures damaged by such disasters. Documentation is used to provide the basis for enforcing preservation easement. In addition, documentation is often the last means of preservation of a property; when a property is to be demolished, its documentation provides future researchers access to valuable information that otherwise would be lost.

HABS/HAER documentation is developed in a number of ways. First and most usually, the National Park Service employs summer teams of student architects, engineers, historians and architectural historians to develop HABS/HAER documentation under the supervision of National Park Service professionals. Second, the National Park Service produces HABS/HAER documentation, in conjunction with restoration

or other preservation treatment, of historic buildings managed by the National Park Service. Third, Federal agencies, pursuant to Section 110(b) of the National Historic Preservation Act, as amended, record those historic properties to be demolished or substantially altered as a result of agency action or assisted action (referred to as mitigation projects). Fourth, individuals and organizations prepare documentation to HABS/HAER standards and donate that documentation to the HABS/HAER collections. For each of these programs, different Documentation Levels will be set.

The Standards describe the fundamental principles of HABS/HAER documentation. They are supplemented by other material describing more specific guidelines, such as line weights for drawings, preferred techniques for architectural photography, and formats for written data. This technical information is found in the HABS/HAER Procedures Manual.

These Guidelines include important information about developing documentation for State or local archives. The State Historic Preservation Officer or the State library should be consulted regarding archival requirements if the documentation will become part of their collections. In establishing archives, the important questions of durability and reproducibility should be considered in relation to the purposes of the collection.

Documentation prepared for the purpose of inclusion in the HABS/HAER collections must meet the requirements below. The HABS/HAER office of the National Park Service retains the right to refuse to accept documentation for inclusion in the HABS/HAER collections when that documentation does not meet HABS/HAER requirements, as specified below.

Standard I: Content

1. *Requirement:* Documentation shall adequately explicate and illustrate what is significant or valuable about the historic building, site, structure or object being documented.

2. *Criteria:* Documentation shall meet one of the following documentation levels to be considered adequate for inclusion in the HABS/HAER collections.

a. Documentation Level I:

(1) Drawings: a full set of measured drawings depicting existing or historic conditions.

(2) Photographs: photographs with large-format negatives of exterior and interior views; photocopies with large format negatives of select existing drawings or historic views where available.

(3) Written data: history and description.

b. Documentation Level II:

(1) Drawings: select existing drawings, where available, should be photographed with large-format negatives or photographically reproduced on mylar.

(2) Photographs: photographs with large-format negatives of exterior and interior views, or historic views, where available.

(3) Written data: history and description.

c. Documentation Level III:

(1) Drawings: sketch plan.

(2) Photographs: photographs with large-format negatives of exterior and interior views.

(3) Written data: architectural data form.

d. Documentation Level IV: HABS/HAER inventory card.

3. *Test*: Inspection of the documentation by HABS/HAER staff.

4. *Commentary*: The HABS/HAER office retains the right to refuse to accept any documentation on buildings, sites, structures or objects lacking historical significance. Generally, buildings, sites, structures or objects must be listed in, or eligible for listing in the National Register of Historic Places to be considered for inclusion in the HABS/HAER collections.

The kind and amount of documentation should be appropriate to the nature and significance of the buildings, site, structure or object being documented. For example, Documentation Level I would be inappropriate for a building that is a minor element of a historic district, notable only for streetscape context and scale. A full set of measured drawings for such a minor building would be expensive and would add little, if any, information to the HABS/HAER collections. Large format photography (Documentation Level III) would usually be adequate to record the significance of this type of building.

Similarly, the aspect of the property that is being documented should reflect the nature and significance of the building, site, structure or object being documented. For example, measured drawings of Dankmar Adler and Louis Sullivan's Auditorium Building in Chicago should indicate not only facades, floor plans and sections, but also the innovative structural and mechanical systems that were incorporated in that building. Large format photography of Gunston Hall in Fairfax County, Virginia, to take another example, should clearly show William Buckland's hand-carved moldings in the Palladian Room, as well as other views.

HABS/HAER documentation is usually in the form of measured drawings, photographs, and written data. While the criteria in this section have addressed only these media, documentation need not be limited to them. Other media, such as films of industrial processes, can and have been used to document historic buildings, sites, structures or objects. If other media are to be used, the HABS/HAER office should be contacted before recording.

The actual selection of the appropriate documentation level will vary, as discussed above. For mitigation documentation projects, this level will be selected by the National Park Service Regional Office and communicated to the agency responsible for completing the documentation. Generally, Level I documentation is required for nationally significant buildings and structures, defined as National Historic Landmarks and the primary historic units of the National Park System.

On occasion, factors other than significance will dictate the selection of another level of documentation. For example, if a rehabilitation of a property is planned, the owner may wish to have a full set of as-built drawings, even though the significance may indicate Level II documentation.

HABS Level I measured drawings usually depict existing conditions through the use of a site plan, floor plans, elevations, sections and construction details. HAER Level I measured drawings will frequently depict original conditions where adequate historical material exists, so as to illustrate manufacturing or engineering processes.

Level II documentation differs from Level I by substituting copies of existing drawings, either original or alteration drawings, for recently executed measured drawings. If this is done, the drawings must meet HABS/HAER requirements outlined below. While existing drawings are rarely as suitable as as-built drawings, they are adequate in many cases for documentation purposes. Only when the desirability of having as-built drawings is clear are Level I measured drawings required in addition to existing drawings. If existing drawings are housed in an accessible collection and cared for archivally, their reproduction for HABS/HAER may not be necessary. In other cases, Level I measured drawings are required in the absence of existing drawings.

Level III documentation requires a sketch plan if it helps to explain the structure. The architectural data form should supplement the photographs by explaining what is not readily visible.

Level IV documentation consists of completed HABS/HAER inventory cards. This level of documentation, unlike the other three levels, is rarely considered adequate documentation for the HABS/HAER collections but is undertaken to identify historic resources in a given area prior to additional, more comprehensive documentation.

Standard II: Quality

1. *Requirement*: HABS and HAER documentation shall be prepared accurately from reliable sources with limitations clearly stated to permit independent verification of information.

2. *Criteria*: For all levels of documentation, the following quality standards shall be met:

a. Measured drawings: Measured drawings shall be produced from recorded, accurate measurements. Portions of the building that were not accessible for measurement should not be drawn on the measured drawings, but clearly labeled as not accessible or drawn from available construction drawings and other sources and so identified. No part of the measured drawings shall be produced from hypothesis or non-measurement related activities. Documentation Level I measured drawings shall be accompanied by a set of field notebooks in which the measurements were first recorded. Other drawings, prepared for Documentation Levels II and III, shall include a statement describing where the original drawings are located.

b. Large format photographs: Large format photographs shall clearly depict the appearance of the property and areas of significance of the recorded building, site, structure or object. Each view shall be perspective-corrected and fully captioned.

c. Written history: Written history and description for Documentation Levels I and II shall be based on primary sources to the greatest extent possible. For Levels III and IV, secondary sources may provide adequate information; if not primary research will be necessary. A frank assessment of the reliability and limitations of sources shall be included. Within the written history, statements shall be footnoted as to their sources, where appropriate. The written data shall include a methodology section specifying name of researcher, date of research, sources searched, and limitations of the project.

3. *Test*: Inspection of the documentation by HABS/HAER staff.

4. *Commentary*: The reliability of the HABS/HAER collections depends on documentation of high quality. Quality is not something that can be easily prescribed or quantified, but it derives from a process in which thoroughness and accuracy play a large part. The principle of independent verification of HABS/HAER documentation is critical to the HABS/HAER collections.

Standard III: Materials

1. *Requirement*: HABS and HAER documentation shall be prepared on materials that are readily reproducible for ease of access; durable for long storage; and in standard sizes for ease of handling.

2. *Criteria*: For all levels of documentation, the following material standards shall be met:

a. Measured Drawings:

- Readily Reproducible: Ink on translucent material.
- Durable: Ink on archivally stable materials.
- Standard Sizes: Two sizes: 19 x 24" or 24 x 36".

b. Large Format Photographs:

- Readily Reproducible: Prints shall accompany all negatives.
- Durable: Photography must be archivally processed and stored.
- Negatives are required on safety film only. Resin-coated paper is not accepted. Color photography is not acceptable.
- Standard Sizes: Three sizes: 4 x 5", 5 x 7", 8 x 10".

c. Written History and Description:

- Readily Reproducible: Clean copy for xeroxing.
- Durable: Archival bond required.

- Standard Sizes: 8 1/2 x 11".

d. Field Records:

- Readily Reproducible: Field notebooks may be xeroxed. Photo identification sheet will accompany 35mm negatives and contact sheets.
- Durable: No requirement.
- Standard Sizes: Only requirement is that they can be made to fit into a 9 1/2 x 12" archival folding file.

3. *Test*: Inspection of the documentation by HABS/HAER staff.

4. *Commentary*: All HABS/HAER records are intended for reproduction; some 20,000 HABS/HAER records are reproduced each year by the Library of Congress. Although field records are not intended for quality reproduction, it is intended that they be used to supplement the formal documentation. The basic durability performance standard for HABS/HAER records is 500 years. Ink on mylar is believed to meet this standard, while color photography, for example, does not. Field records do not meet this archival standard, but are maintained in the HABS/HAER collections as a courtesy to the collection user.

Standard IV: Presentation

1. *Requirement*: HABS and HAER documentation shall be clearly and concisely produced.

2. *Criteria*: For levels of documentation as indicated below, the following standards for presentation will be used:

a. Measured Drawings: Level I measured drawings will be lettered mechanically (i.e., Leroy or similar) or in a handprinted equivalent style. Adequate dimensions shall be included on all sheets. Level III sketch plans should be neat and orderly.

b. Large format photographs: Level I photographs shall include duplicate photographs that include a scale. Level II and III photographs shall include, at a minimum, at least one photograph with a scale, usually of the principal facade.

c. Written history and description: Data shall be typewritten on bond, following accepted rules of grammar.

3. *Test*: Inspection of the documentation by HABS/HAER staff.

Architectural and Engineering Documentation Prepared for Other Purposes

Where a preservation planning process is in use, architectural and engineering documentation, like other treatment activities, are undertaken to achieve the goals identified by the preservation planning process. Documentation is deliberately selected as a treatment for properties evaluated as significant, and the development of the documentation program for a property follows from the planning objectives. Documentation efforts focus on the significant characteristics of the property, as defined in the previously completed evaluation. The selection of a level of documentation and the documentation techniques (measured drawings, photography, etc.) is based on the significance of the property and the management needs for which the documentation is being performed. For example, the kind and level of documentation required to record a historic property for easement purposes may be less detailed than that required as mitigation prior to destruction of the property. In the former case, essential documentation might be limited to the portions of the property controlled by the easement, for example, exterior facades; while in the latter case, significant interior architectural features and non-visible structural details would also be documented.

The principles and content of the HABS/HAER criteria may be used for guidance in creating documentation requirements for other archives. Levels of documentation and the durability and sizes of documentation may vary depending on the intended use and the repository. Accuracy of documentation should be controlled by assessing the reliability of all sources and making that assessment available in the archival record; by describing the limitations of the information available from research and physical examination of the property; and by retaining the primary data (field measurements and notebooks) from which the archival record was produced. Usefulness of the documentation products depends on preparing the documentation

on durable materials that are able to withstand handling and reproduction, and in sizes that can be stored and reproduced without damage.

Recommended Sources of Technical Information

Recording Historic Buildings. Harley J. McKee. Government Printing Office, 1970. Washington, D.C.

HABS/HAER Procedures Manual. Historic American Buildings Survey/Historic American Engineering Record, National Park Service, 1980. Washington, D.C.

Photogrammetric Recording of Cultural Resources. Terry E. Borchers. Technical Preservation Services, U.S. Department of the Interior, 1977. Washington, D.C.

Rectified Photography and Photo Drawings for Historic Preservation. J. Henry Chambers. Technical Preservation Services, U.S. Department of the Interior, 1975. Washington, D.C.

Secretary of the Interior's Standards for Archeological Documentation

Archeological documentation is a series of actions applied to properties of archeological interest. Documentation of such properties may occur at any or all levels of planning, identification, evaluation or treatment. The nature and level of documentation is dictated by each specific set of circumstances. Archeological documentation consists of activities such as archival research, observation and recording of above-ground remains, and observation (directly, through excavation, or indirectly, through remote sensing) of below-ground remains. Archeological documentation is employed for the purpose of gathering information on individual historic properties or groups of properties. It is guided by a framework of objectives and methods derived from the planning process, and makes use of previous planning decisions, such as those on evaluation of significance. Archeological documentation may be undertaken as an aid to various treatment activities, including research, interpretation, reconstruction, stabilization and data recovery when mitigating archeological losses resulting from construction. Care should be taken to assure that documentation efforts do not duplicate previous efforts.

Standard I. Archeological Documentation Activities Follow an Explicit Statement of Objectives and Methods That Responds to Needs Identified in the Planning Process

Archeological research and documentation may be undertaken to fulfill a number of needs, such as overviews and background studies for planning, interpretation or data recovery to mitigate adverse effects. The planning needs are articulated in a statement of objectives to be accomplished by the archeological documentation activities. The statement of objectives guides the selection of methods and techniques of study and provides a comparative framework for evaluating and deciding the relative efficiency of alternatives. Satisfactory documentation involves the use of archeological and historical sources, as well as those of other disciplines. The statement of objectives usually takes the form of a formal and explicit research design which has evolved from the interrelation of planning needs, current knowledge, resource value and logistics.

Standard II. The Methods and Techniques of Archeological Documentation are Selected To Obtain the Information Required by the Statement of Objectives

The methods and techniques chosen for archeological documentation should be the most effective, least destructive, most efficient and economical means of obtaining the needed information. Methods and techniques should be selected so that the results may be verified if necessary. Non-destructive techniques should be used whenever appropriate. The focus on stated objectives should be maintained throughout the process of study and documentation.

Standard III. The Results of Archeological Documentation are Assessed Against the Statement of Objectives and Integrated Into the Planning Process

One product of archeological documentation is the recovered data; another is the information gathered about the usefulness of the statement of objectives itself. The recovered data are assessed against the objectives to determine how they meet the specified planning needs. Information related to archeological site types, distribution and density should be integrated in planning at the level of identification and

evaluation. Information and data concerning intra-site structure may be needed for developing mitigation strategies and are appropriately integrated at this level of planning. The results of the data analyses are integrated into the body of current knowledge. The utility of the method of approach and the particular techniques which were used in the investigation (i.e. the research design) should be assessed so that the objectives of future documentation efforts may be modified accordingly.

Standard IV. The Results of Archeological Documentation are Reported and Made Available to the Public

Results must be accessible to a broad range of users including appropriate agencies, the professional community and the general public. Results should be communicated in reports that summarize the objectives, methods, techniques and results of the documentation activity, and identify the repository of the materials and information so that additional detailed information can be obtained, if necessary. The public may also benefit from the knowledge obtained from archeological documentation through pamphlets, brochures, leaflets, displays and exhibits, or by slide, film or multimedia productions. The goal of disseminating information must be balanced, however, with the need to protect sensitive information whose disclosure might result in damage to properties. Curation arrangements sufficient to preserve artifacts, specimens and records generated by the investigation must be provided for to assure the availability of these materials for future use.

Secretary of the Interior's Guidelines for Archeological Documentation

Introduction

These Guidelines link the Standards for Archeological Documentation with more specific guidance and technical information. They describe one approach to meeting the Standards for Documentation. Agencies, organizations or individuals proposing to approach archeological documentation differently may wish to review their approach with the National Park Service.

The Guidelines are organized as follows:

- Archeological Documentation Objectives
- Documentation Plan
- Methods
- Reporting Results
- Curation
- Recommended Sources of Technical Information

Archeological Documentation Objectives

The term "archeological documentation" is used here to refer specifically to any operation that is performed using archeological techniques as a means to obtain and record evidence about past human activity that is of importance to documenting history and prehistory in the United States. Historic and prehistoric properties may be important for the data they contain, or because of their association with important persons, events, or processes, or because they represent architectural or artistic values, or for other reasons. Archeological documentation may be an appropriate option for application not only to archeological properties, but to above-ground structures as well, and may be used in collaboration with a wide range of other treatment activities.

If a property contains artifacts, features, and other materials that can be studied using archeological techniques, then archeological documentation may be selected to achieve particular goals of the planning process-such as to address a specified information need, or to illustrate significant associative values. Within the overall goals and priorities established by the planning process, particular methods of investigation are chosen that best suit the types of study to be performed.

Relationship of archeological documentation to other types of documentation or other treatments: Archeological documentation is appropriate for achieving any of various goals, including:

1. Collection of base-line data;
2. Problem-oriented research directed toward particular data gaps recognized in the historic context(s);
3. Preservation or illustration of significance which has been identified for treatment by the planning process; or
4. Testing of new investigative or conservation techniques, such as the effect of different actions such as forms of site burial (aqueous or non-aqueous).

Many properties having archeological components have associative values as well as research values. Examples include Native American sacred areas and historic sites such as battlefields. Archeological documentation may preserve information or data that are linked to the identified values that a particular property possesses. Depending on the property type and the range of values represented by the property, it may be necessary to recover information that relates to an aspect of the property's significance other than the specified research questions. It is possible that conflicts may arise between the optimal realizations of research goals and other issues such as the recognition/protection of other types of associative values. The research design for the archeological documentation should provide for methods and procedures to resolve such conflicts, and for the close coordination of the archeological research with the appropriate ethnographic, social or technological research.

Documentation Plan

Research Design: Archeological documentation can be carried out only after defining explicit goals and a methodology for reaching them. The goals of the documentation effort directly reflect the goals of the preservation plan and the specific needs identified for the relevant historic contexts. In the case of problem oriented archeological research, the plan usually takes the form of a formal research design, and includes, in addition to the items below, explicit statements of the problem to be addressed and the methods or tests to be applied. The purpose of the statement of objectives is to explain the rationale behind the documentation effort; to define the scope of the investigation; to identify the methods, techniques, and procedures to be used; to provide a schedule for the activities; and to permit comparison of the proposed research with the results. The research design for an archeological documentation effort follows the same guidelines as those for identification (see the Guidelines for Identification) but has a more property-specific orientation.

The research design should draw upon the preservation plan to identify:

1. Evaluated significance of the property(ies) to be studied;
2. Research problems or other issues relevant to the significance of the property;
3. Prior research on the topic and property type; and how the proposed documentation objectives are related to previous research and existing knowledge;
4. The amount and kinds of information (data) required to address the documentation objectives and to make reliable statements, including at what point information is redundant and documentation efforts have reached a point of diminishing returns;
5. Methods to be used to find the information; and
6. Relationship of the proposed archeological investigation to anticipated historical or structural documentation, or other treatments.

The primary focus of archeological documentation is on the data classes that are required to address the specified documentation objectives. This may mean that other data classes are deliberately neglected. If so, the reasons for such a decision should be carefully justified in terms of the preservation plan.

Archeological investigations seldom are able to collect and record all possible data. It is essential to determine the point at which further data recovery and documentation fail to improve the usefulness of the archeological information being recovered. One purpose of the research design is to estimate those limits in advance and to suggest at what point information becomes duplicative. Investigation strategies should be selected based on these general principles, considering the following factors:

1. Specific data needs;
2. Time and funds available to secure the data; and
3. Relative cost efficiency of various strategies.

Responsiveness to the concerns of local groups (e.g., Native American groups with ties to specific properties) that was built into survey and evaluation phases of the preservation plan, should be maintained in archeological investigation, since such activity usually involves site disturbance. The research design, in addition to providing for appropriate ethnographic research and consultation, should consider concerns voiced in previous phases. In the absence of previous efforts to coordinate with local or other interested groups, the research design should anticipate the need to initiate appropriate contracts and provide a mechanism for responding to sensitive issues, such as the possible uncovering of human remains or discovery of sacred areas.

The research design facilitates an orderly, goal directed and economical project. However, the research design must be flexible enough to allow for examination of unanticipated but important research opportunities that arise during the investigation.

Documentation Methods

Background Review: Archeological documentation usually is preceded by, or integrated with historical research (i.e. that intensive background information gathering including identification of previous archeological work and inspection of museum collections; gathering relevant data on geology, botany, urban geography and other related disciplines; archival research; informant interviews, or recording of oral tradition, etc.).

Depending on the goals of the archeological documentation, the background historical and archeological research may exceed the level of research accomplished for development of the relevant historic contexts or for identification and evaluation, and focuses on the unique aspects of the property to be treated. This assists in directing the investigation and locates a broader base of information than that contained in the property itself for response to the documentation goals. This activity is particularly important for historic archeological properties where information sources other than the property itself may be critical to preserving the significant aspects of the property. (See the Secretary of the Interior's Standards and Guidelines for Historical Documentation for discussion of associated research activities.)

Field Studies: The implementation of the research design in the field must be flexible enough to accommodate the discovery of new or unexpected data classes or properties, or changing field conditions. A phased approach may be appropriated when dealing with large complex properties or groups of properties, allowing for changes in emphasis or field strategy, or termination of the program, based on analysis of recovered data at the end of each phase. Such an approach permits the confirmation of assumptions concerning property extent, content or organization which had been made based on data gathered from identification and evaluation efforts, or the adjustment of those expectations and resulting changes in procedure. In some cases a phased approach may be necessary to gather sufficient data to calculate the necessary sample size for a statistically valid sample. A phased documentation program may often be most cost-effective, in allowing for early termination of work if the desired objectives cannot be achieved.

Explicit descriptive statements of and justification for field study techniques are important to provide a means of evaluating results. In some cases, especially those employing a sampling strategy in earlier phases (such as identification or evaluation), it is possible to estimate parameters of certain classes of data in a fairly rigorous statistical manner. It is thus desirable to maintain some consistency in choice of sampling designs throughout multiple phases of work at the same property. Consistency with previously employed area sampling frameworks also improves potential replication in terms of later locating sampled and unsampled areas. It often is desirable to estimate the nature and frequency of data parameters based on existing information or analogy to other similar cases. These estimates may then be tested in field studies.

An important consideration in choosing methods to be used in the field studies should be assuring full, clear, and accurate descriptions of all field operations and observations, including excavation and recording techniques and stratigraphic or inter-site relationships.

To the extent feasible, chosen methodologies and techniques should take into account the possibility that future researchers will need to use the recovered data to address problems not recognized at the time the data were recovered. The field operation may recover data that may not be fully analyzed; this data, as well as the data analyzed, should be recorded and preserved in a way to facilitate future research.

A variety of methodologies may be used. Choices must be explained, including a measure of cost-effectiveness relative to other potential choices. Actual results can then be measured against expectations, and the information applied later in similar cases.

Destructive methods should not be applied to portions or elements of the property if nondestructive methods are practical. If portions or elements of the property being documented are to be preserved in place, the archeological investigation should employ methods that will leave the property as undisturbed as possible. However, in cases where the property will be destroyed by, for example, construction following the investigation, it may be most practical to gather the needed data in the most direct manner, even though that may involve use of destructive techniques.

Logistics in the field, including the deployment of personnel and materials and the execution of sampling strategies, should consider site significant, anticipated location of most important data, cost effectiveness, potential time limitations and possible adverse environmental conditions.

The choice of methods for recording data gathered in the field should be based on the research design. Based on that statement, it is known in advance of field work what kinds of information are needed for analysis; record-keeping techniques should focus on these data. Field records should be maintained in a manner that permits independent interpretation in so far as possible. Record-keeping should be standardized in format and level of detail.

Archeological documentation should be conducted under the supervision of qualified professionals in the disciplines appropriate to the data that are to be recovered. When the general public is directly involved in archeological documentation activities, provision should be made for training and supervision by qualified professionals. (See the Professional Qualifications Standards.)

Analysis: Archeological documentation is not completed with field work; analysis of the collected information is an integral part of the documentation activity, and should be planned for in the research design. Analytical techniques should be selected that are relevant to the objectives of the investigation. Forms of analysis that may be appropriate, depending on the type of data recovered and the objectives of the investigation, include but are not limited to: studying artifact types and distribution; radiometric and other means of age determination; studies of soil stratigraphy; studies of organic matter such as human remains, pollen, animal bones, shells and seeds; study of the composition of soils and study of the natural environment in which the property appears.

Reporting Results

Report Contents: Archeological documentation concludes with written report(s) including minimally the following topics:

1. Description of the study area;
2. Relevant historical documentation/background research;
3. The research design;
4. The field studies as actually implemented, including any deviation from the research design and the reason for the changes;
5. All field observations;
6. Analyses and results, illustrated as appropriate with tables, charts, and graphs;
7. Evaluation of the investigation in terms of the goals and objectives of the investigation, including discussion of how well the needs dictated by the planning process were served;
8. Recommendations for updating the relevant historic contexts and planning goals and priorities, and generation of new or revised information needs;

9. Reference to related on-going or proposed treatment activities, such as structural documentation, stabilization, etc.; and
10. Information on the location of original data in the form of field notes, photographs, and other materials.

Some individual property information, such as specific locational data, may be highly sensitive to disclosure, because of the threat of vandalism. If the objectives of the documentation effort are such that a report containing confidential information such as specific site locations or information on religious practices is necessary, it may be appropriate to prepare a separate report for public distribution. The additional report should summarize that information that is not under restricted access in a format most useful to the expected groups of potential users. Peer review of draft reports is recommended to ensure that state-of-the-art technical reports are produced.

Availability: Results must be made available to the full range of potential users. This can be accomplished through a variety of means including publication of results in monographs and professional journals and distribution of the report to libraries or technical clearinghouses such as the National Technical Information Service in Springfield, Virginia.

Curation

Archeological specimens and records are part of the documentary record of an archeological site. They must be curated for future use in research, interpretation, preservation, and resource management activities. Curation of important archeological specimens and records should be provided for in the development of any archeological program or project.

Archeological specimens and records that should be curated are those that embody the information important to history and prehistory. They include artifacts and their associated documents, photographs, maps, and field notes; materials of an environmental nature such as bones, shells, soil and sediment samples, wood, seeds, pollen, and their associated records; and the products and associated records of laboratory procedures such as thin sections, and sediment fractions that result from the analysis of archeological data.

Satisfactory curation occurs when:

1. Curation facilities have adequate space, facilities, and professional personnel;
2. Archeological specimens are maintained so that their information values are not lost through deterioration, and records are maintained to a professional archival standard;
3. Curated collections are accessible to qualified researchers within a reasonable time of having been requested; and
4. Collections are available for interpretive purposes, subject to reasonable security precautions.

Recommended Sources of Technical Information

Archeomagnetism: A Handbook for the Archeologist. Jeffrey L. Eighmy, U.S. Department of the Interior, Washington, D.C., 1980.

The Curation and Management of Archeological Collections: A Pilot Study. Cultural Resource Management Series, U.S. Department of the Interior, September 1980.

Human Bones and Archeology. Douglas H. Ubelaker. Interagency Archeological Services, Heritage Conservation and Recreation Service, U.S. Department of the Interior, Washington, D.C., 1980.

Manual for Museums, Ralph H. Lewis, National Park Service, U.S. Department of the Interior, 1976.

Treatment of Archeological Properties: A Handbook. Advisory Council on Historic Preservation, Washington, D.C., 1980

The Secretary of the Interior's Standards for the Treatment of Historic Properties

The Secretary of the Interior's Standards for the Treatment of Historic Properties apply to all proposed development grant-in-aid projects assisted through the National Historic Preservation Fund and are intended to be applied to a wide variety of resource types, including buildings, sites, structures, objects, and districts. These standards, revised in 1992, were published in the July 12, 1995, *Federal Register* and codified as 36 CFR Part 38. They replace the 1978 and 1983 versions of 36 CFR Part 68 titled "The Secretary of the Interior's Standards for Historic Preservation Projects."

Another regulation, 36 CFR Part 67, focuses on "certified historic structures" as defined by the IRS Code of 1986. The "Standards for Rehabilitation" in 36 CFR Part 67 should always be used when property owners are seeking certification for federal tax benefits.

Treatments

There are Standards for four distinct, but interrelated, approaches to the treatment of historic properties–Preservation, Rehabilitation, Restoration, and Reconstruction. The treatment *Preservation* focuses on the maintenance and repair of existing historic materials and retention of a property's form as it has evolved over time. *Rehabilitation* acknowledges the need to alter or add to a historic property to meet continuing or changing uses while retaining the property's historic character. *Restoration* is undertaken to depict a property at a particular period of time in its history, while removing evidence of other periods. *Reconstruction* re-creates vanished or non-surviving portions of a property for interpretive purposes.

In summary, the simplification and sharpened focus of these revised sets of treatment Standards is intended to assist users in making sound historic preservation decisions. Choosing an appropriate treatment for a historic property, whether preservation, rehabilitation, restoration, or reconstruction is critical. This choice always depends on a variety of factors, including the property's historical significance, physical condition, proposed use, and intended interpretation.

Preservation is defined as the act or process of applying measures necessary to sustain the existing form, integrity, and materials of an historic property. Work, including preliminary measures to protect and stabilize the property, generally focuses upon the ongoing maintenance and repair of historic materials and features rather than extensive replacement and new construction. New exterior additions are not within the scope of this treatment; however, the limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a preservation project.

Standards for Preservation

1. A property will be used as it was historically, or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.

2. The historic character of a property will be retained and preserved. The replacement of intact or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

Rehabilitation is defined as the act or process of making possible an efficient compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values.

Standards for Rehabilitation

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.

2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.

3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.

6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.

7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.

10. New additions and adjacent or related new construction will be undertaken in a such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

Restoration is defined as the act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period. The limited and sensitive upgrading of mechanical, electrical, and plumbing systems and other code-required work to make properties functional is appropriate within a restoration project.

Standards for Restoration

1. A property will be used as it was historically or be given a new use which interprets the property and its restoration period.

2. Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period will be not be undertaken.

3. Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.

4. Materials, features, spaces, and finishes that characterize other historical periods will be documented prior to their alteration or removal.

5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.

6. Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials.

7. Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.

8. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.

9. Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.

10. Designs that were never executed historically will not be constructed.

Reconstruction is defined as the act of process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.

Standards for Reconstruction

1. Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.

2. Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.

3. Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.

4. Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.

5. A reconstruction will be clearly identified as a contemporary re-creation.

6. Designs that were never executed historically will not be constructed.

Secretary of the Interior's Guidelines for Treatment of Historic Properties

The guidelines for the Secretary of the Interior's Standards for Treatment of Historic Properties, not included here because of their length, may be obtained separately from the National Park Service.

Professional Qualifications Standards

The following requirements are those used by the National Park Service, and have been previously published in the Code of Federal Regulations, 36 CFR Part 61. The qualifications define minimum education and experience required to perform identification, evaluation, registration, and treatment activities. In some cases, additional areas or levels of expertise may be needed, depending on the complexity of the task and the nature of the historic properties involved. In the following definitions, a year of full-time professional experience need not consist of a continuous year of full-time work but may be made up of discontinuous periods of full-time or part-time work adding up to the equivalent of a year of full-time experience.

History

The minimum professional qualifications in history are a graduate degree in history or closely related field; or a bachelor's degree in history or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, teaching, interpretation, or other demonstrable professional activity with an academic institution, historic organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of history.

Archeology

The minimum professional qualifications in archeology are a graduate degree in archeology, anthropology, or closely related field plus:

1. At least one year of full-time professional experience or equivalent specialized training in archeological research, administration or management;
2. At least four months of supervised field and analytic experience in general North American archeology; and
3. Demonstrated ability to carry research to completion.

In addition to these minimum qualifications, a professional in prehistoric archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the prehistoric period. A professional in historic archeology shall have at least one year of full-time professional experience at a supervisory level in the study of archeological resources of the historic period.

Architectural History

The minimum professional qualifications in architectural history are a graduate degree in architectural history, art history, historic preservation, or closely related field, with coursework in American architectural history; or a bachelor's degree in architectural history, art history, historic preservation or closely related field plus one of the following:

1. At least two years of full-time experience in research, writing, or teaching in American architectural history or restoration architecture with an academic institution, historical organization or agency, museum, or other professional institution; or
2. Substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

Architecture

The minimum professional qualifications in architecture are a professional degree in architecture plus at least two years of full-time experience in architecture; or a State license to practice architecture.

Historic Architecture

The minimum professional qualifications in historic architecture are a professional degree in architecture or a State license to practice architecture, plus one of the following:

1. At least one year of graduate study in architectural preservation, American architectural history, preservation planning, or closely related field; or
2. At least one year of full-time professional experience on historic preservation projects.

Such graduate study or experience shall include detailed investigations of historic structures, preparation of historic structures research reports, and preparation of plans and specifications for preservation projects.

Preservation Terminology

Acquisition–the act or process of acquiring fee title or interest other than fee title of real property (including acquisition of development rights or remainder interest).

Comprehensive Historic Preservation Planning–the organization into a logical sequence of preservation information pertaining to identification, evaluation, registration and treatment of historic properties, and setting priorities for accomplishing preservation activities.

Historic Context–a unit created for planning purposes that groups information about historic properties based on a shared theme, specific time period and geographical area.

Historic Property–a district, site, building, structure or object significant in American history, architecture, engineering, archeology or culture at the national, State, or local level.

Integrity–the authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic or prehistoric period.

Intensive Survey–a systematic, detailed examination of an area designed to gather information about historic properties sufficient to evaluate them against predetermined criteria of significance within specific historic contexts.

Inventory–a list of historic properties determined to meet specified criteria of significance.

National Register Criteria–the established criteria for evaluating the eligibility of properties for inclusion in the National Register of Historic Places.

Preservation (treatment)–the act or process of applying measures to sustain the existing form, integrity and material of a building or structure, and the existing form and vegetative cover of a site. It may include initial stabilization work, where necessary, as well as ongoing maintenance of the historic building materials.

Property Type–a grouping of individual properties based on a set of shared physical or associative characteristics.

Protection–the act or process of applying measures designed to affect the physical condition of a property by defending or guarding it from deterioration, loss or attack, or to cover or shield the property from danger or injury. In the case of buildings and structures, such treatment is generally of a temporary nature and anticipates future historic preservation treatment; in the case of archeological sites, the protective measure may be temporary or permanent.

Reconnaissance Survey–an examination of all or part of an area accomplished in sufficient detail to make generalizations about the types and distributions of historic properties that may be present.

Reconstruction (treatment)–the act or process of reproducing by new construction the exact form and detail of a vanished building, structure, or object, or any part thereof, as it appeared at a specific period of time.

Rehabilitation (treatment)–the act or process of returning a property to a state of utility through repair or alteration which makes possible an efficient contemporary use while preserving those portions or features of the property which are significant to its historical, architectural and cultural values.

Research design–a statement of proposed identification, documentation, investigation, or other treatment of a historic property that identifies the project's goals, methods and techniques, expected results, and the relationship of the expected results to other proposed activities or treatments.

Restoration–the act or process of accurately recovering the form and details of a property and its setting as it appeared at a particular period of time by means of the removal of later work or by the replacement of missing earlier work.

Sample Survey–survey of a representative sample of lands within a given area in order to generate or test predictions about the types and distributions of historic properties in the entire area.

Stabilization–the act or process of applying measures designed to reestablish a weather resistant enclosure and the structural stability of an unsafe or deteriorated property while maintaining the essential form as it exists at present.

Statement of objectives–see Research design.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX E: Qualification Standards and Selective or Quality Ranking Factors for Cultural Resource Specialists

The Office of Personnel Management General Schedule Qualification Standards contains the minimal qualifications for personnel in cultural resource positions. Various knowledges, skills and abilities may be needed for cultural resources specialists positions. Some selective or quality ranking factors *not* cited in the General Schedule Qualification Standards follow. (see also Federal Register / Vol. 62, No. 119 / Friday, June 20, 1997 / Notice)

Anthropologist/Applied Ethnographer (GS-190), 11-12: same as above but with at least one year of independent field research, six months of professional supervisory experience, and six months of administrative experience.

Anthropologist/Applied Ethnographer (GS-190), 13-15: a Ph.D. or the equivalent in cultural anthropology/applied ethnography with coursework in North American ethnography, applied anthropology, and cultural ecology; at least two years of independent field research in a cross-cultural setting involving the application of anthropological theory and method to the study of contemporary Native American or other North American peoples; demonstrated ability to analyze data for practical implications and to plan, conduct, provide written reports on, and evaluate field research; at least one year of full-time professional supervisory experience in anthropological research management; at least one year of administrative experience; demonstrated ability to design, develop, implement, and evaluate programs affecting cultural systems of contemporary North Americans; demonstrated experience with current applied anthropological methodologies; demonstrated experience working in multidisciplinary settings; evidence of contributions to the field of applied cultural anthropology through program planning and development, teaching, research, publication, and participation in professional anthropological associations.

Anthropologist/Applied Ethnographer (GS-190), 7-9: an M.A. in cultural anthropology/applied ethnography with coursework in North American ethnography, applied anthropology, and cultural ecology; at least one month of supervised fieldwork in a cross-cultural setting involving the application of anthropological theory and method to the study of contemporary Native American or other North American peoples; familiarity with major anthropological theories and applied methods, evidence of writing skills, and ability to conduct field and documentary research under supervision; ability to work in multidisciplinary settings.

Anthropologist/Archeologist (GS-193), 9-15: a bachelor's degree or the equivalent in anthropology, relevant course work in archeology, plus two years of graduate study or a master's degree; and demonstrated ability to conduct archeological work. Must meet additional conditions set forth in the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. In addition, a professional in prehistoric archeology must have at least one year of full-time professional experience at a supervisory level in the study of prehistoric resources, and a professional in historical archeology must have at least one year of full-time professional experience at a supervisory level in the study of historic-period resources.

Architectural Conservator (GS-1001), 5-11: a degree with emphasis in the scientific analysis of structure materials.

Architectural Historian (GS-170), 9-15: a graduate degree in architectural history, art history, or historic preservation, with course work in American architectural history; or a bachelor's degree in architectural history with concentration in American architecture; or a bachelor's degree in architectural history, art history, or historic preservation, and at least two years of full-time experience in research, writing, or teaching in American architectural history or preservation architecture with an academic institution, historical organization or agency, museum, or other professional institution; or a bachelor's degree in architectural history, art history, or historic preservation, and substantial contribution through research and publication to the body of scholarly knowledge in the field of American architectural history.

Conservator (Museum Specialist) (GS-1016): a graduate degree in one or more specializations in museum conservation plus a one-year internship; or a formal apprenticeship with a qualified conservator or supervised experience in conservation work in an established conservation laboratory for a period of four years.

Curator (GS-1015), 9-15: a full four-year course of study in an accredited college or university leading to a bachelor's degree with major study in museum work or an applicable subject matter field; or four years of experience, or education and experience, that provided knowledge and ability comparable to that normally acquired through the successful completion of the four-year course of study described above. Acceptable experience may have been gained in a museum or other type of research organization, in a variety of scholarly pursuits including teaching, writing, or study in an appropriate field, or in other types of professional or technical occupations if it has provided the requisite knowledge. Applicants must also have three years of professional experience or appropriate graduate education in the subject matter applicable to the position.

Historian (GS-170), 9-15: a graduate degree in history or closely related field; or a bachelor's degree in history or closely related field plus at least two years of full-time experience in research, writing, teaching, interpretation, or other professional activity with an academic institution, historical organization or agency, museum, or other professional institution; or substantial contribution through research and publication to the body of scholarly knowledge in the field of history.

Historical Architect (GS-808), 9-15: a degree in architecture; a license to practice architecture; at least one year of graduate study in architectural preservation, American architectural history, or preservation planning, and at least one year of full-time professional experience on preservation and restoration projects, or at least two years of full-time professional experience on preservation and restoration projects, which must include detailed investigations of historic structures, preparation of historic structure research projects, and preparation of construction documents for preservation projects.

Historical Craftsperson (Mason, Carpenter, Painter, Shipwright, etc.) (WG): factors are the ability to demonstrate journeyman-level skills in one craft and an exposure to historic preservation methods and philosophy.

Historical Landscape Architect (GS-807), 9-15: a graduate degree in landscape architecture (MLA), a license to practice landscape architecture, and at least two years of full-time professional experience in landscape preservation projects; or an undergraduate degree in landscape architecture (BLA) and six years of full-time professional experience in landscape preservation projects and knowledge of landscape architectural history, practice, preservation technologies.

Historical Maintenance Person (WG): factors are the ability to demonstrate apprentice-level skills in one craft and an exposure to historic preservation methods and philosophy.

Intern Conservator (in summer work projects): a degree in fine arts, sciences, or a closely related field plus at least one year of graduate study in a museum conservation program; or at least one year of full-time professionally supervised experience in an established conservation laboratory; intern conservators will be under day-to-day supervision of a qualified conservator or will work within a scope of work approved by a professional conservator, concurred in by the regional curator, and monitored at least monthly by the approving conservator.

Intern Historical Architect (GS-808), 5-7: a degree in architecture; at least one year of graduate study in architectural preservation, American architectural history, or preservation planning, or at least one year of full-time professional experience on preservation projects.

Intern Historical Landscape Architect (GS-807), 5-7: a bachelor's degree in landscape architecture or a student in an accredited landscape architecture academic program.

Landscape Historian (GS-170), 9-15: a graduate degree in American studies, art history, architectural history, or historic preservation with course work in American landscape history and a knowledge of field techniques associated with the examination and evaluation of cultural landscapes; or a bachelor's degree in American studies, art history, architectural history, or historic preservation with course work in American landscape history, and at least two years of full-time experience in research, writing, or teaching American landscape history with an academic institution, and knowledge of field techniques associated with the examination and evaluation of cultural landscapes.

Preservation Gardener (WG, 4-8): an associate degree in horticulture or completion of a program; or certification offered through a professionally recognized or accredited institution offering a gardening/horticulture curriculum; or four years of field experience in the area of cultural landscape preservation maintenance.

Preservation Horticulturist (GS-437), 7-13: a bachelor's degree in horticulture and two years of experience in the coordination, maintenance, and treatment of cultural landscapes; and knowledge of historic plant materials, historic maintenance practices and technologies.

Preservation Specialist (Exhibit Specialist) (GS-1010), 11-13: factors include an understanding of historic preservation methods and philosophy plus (1) the ability to demonstrate journeyman-level skills in two crafts and the knowledge and ability to act as a project supervisor or (2) the ability to demonstrate master-level skills in one craft with the ability for training others.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX F: Selected Management Bibliography

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NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX G: Advisory Council on Historic Preservation Technical Bibliography

Copies of the following publications are available from the Advisory Council on Historic Preservation, 1100 Pennsylvania Ave, NW, Suite 809, Washington, DC 20004.

Council Information

Fact Sheet: About the Council. Summarizes the purpose, membership, major responsibilities, and establishing legislation of the Council.

Fact Sheet: Council Members. Lists 19 Council members and presents biographical sketches of the chairman, vice chairman, representatives of the general public, historic preservation expert members, governor, and mayor.

Fact Sheet: Professional Staff. Lists names and titles of Council staff located in the agency's Washington and Denver offices.

Fact Sheet: Eastern Office of Project Review: Staff and Organization. Lists staff assignments by geographic division and federal agency for the Council's Eastern Office of Project Review, which is responsible for administering the Section 106 regulatory review process in the eastern states.

General Information

Fact Sheet: A Guide to Selected Key Preservation Organizations. Briefly describes the preservation programs and groups about which the Council most often receives inquiries.

Fact Sheet: State Historic Preservation Officers and Contacts. Lists the name, address, and telephone number of the state historic preservation officer (SHPO) and deputy for each state and territory.

Fact Sheet: Federal Agency Preservation Officers and Contacts. Lists persons designated as their agencies' preservation officers, per Section 110(c) of the National Historic Preservation Act, and others who serve as agency contacts for preservation activities.

Where to Look: A Guide to Preservation Information. 88 pp. July 1982. A selective gathering of information on available materials in preservation and related fields. Each entry is described briefly within its category, so that the result is a bibliographic essay rather than a catalog of materials. Sections of the illustrated booklet cover such aspects of preservation as legislation and legal controls; the relationship of planning to preservation; adaptive use; tax and other economic incentives; technical handbooks on rehabilitation, materials, and services; and education at primary, secondary, and higher levels in the United States and abroad.

Working with Section 106 and Federal Preservation Regulations

Protection of Historic Properties [36 CFR Part 800]. 19 pp. October 1985. A typeset, easy-to-read copy of the regulations for federal agency compliance with Section 106 of the National Historic Preservation Act; includes marginal notes.

Fact Sheet: A Five-Minute Look at Section 106 Review. 4 pp. April 1989. Briefly explains the five steps in the review process: identification and evaluation of historic properties, assessment of effects, consultation, Council comment, and proceeding with action.

Section 106, Step-by-Step. 63 pp. October 1986. Walks the reader through each step of the Section 106 review process in 36 CFR Part 800.

Introduction to Federal Projects and Historic Preservation Law–A Training Course. Describes the Council's 3-day training course in identifying historic properties, preparing needed documentation, and developing ways of accommodating historic preservation requirements with project needs. Includes course dates and locations.

Preparing Agreement Documents. 88 pp. September 1989. For use in preparing memoranda of agreement, programmatic agreements, and conditioned determinations of "no adverse effect."

Identification of Historic Properties: A Decisionmaking Guide for Managers. 25 pp. September 1988. Sets out basic principles and approaches that should be considered when agency officials design an effort to identify historic properties; discusses their application.

Public Participation in Section 106 Review: A Guide for Agency Officials. 21 pp. February 1989. Presents public participation principles, criteria for evaluating existing public participation programs, methods of public participation, and documentation of public participation efforts.

The Section 110 Guidelines: Annotated Guidelines for Federal Agency Responsibilities under Section 110 of the National Historic Preservation Act. 56 pp. November 1989. Guides implementation of Section 110, whereby federal agencies must carry out their programs in accordance with national historic preservation policy, designate historic preservation officers, identify and preserve historic properties under their ownership or control, and try to minimize harm to national historic landmarks.

Fact Sheet: Programmatic Agreements under Section 106. 8 pp. August 1988. Provides background information on programmatic approaches to project review, explains when programmatic agreements are appropriate, and discusses such matters as initiating PAs and public participation in PA development.

Fact Sheet: Section 106 Participation by Applicants for and Recipients of Federal Assistance, Permits, and Licenses. 5 pp. October 1988. Defines which individuals are to be considered recipients and applicants, how federal agencies may delegate Section 106 responsibilities, and how these individuals may participate in Section 106 review.

Fact Sheet: Section 106 Participation by Indian Tribes and Other Native Americans. 7 pp. September 1988. Outlines provisions specific to Indian lands in the review process and discusses Section 106 participation by tribes, other Native Americans, and traditional cultural leaders.

Fact Sheet: Section 106 Participation by Local Governments. 8 pp. November 1988. Identifies the role of local governments in Section 106 review and explains the responsibilities of Certified Local Governments.

Fact Sheet: Section 106 Participation by State Historic Preservation Officers. 7 pp. October 1988. Outlines the duties of the SHPO, how the SHPO participates in Section 106 review, and the SHPO's importance to the national historic preservation program.

Fact Sheet: Consulting the Council Under Section 111 of the National Historic Preservation Act. 3 pp. October 1988. Explains how federal agencies may comply with Section 111 of the National Historic Preservation Act, which authorizes agencies to lease and exchange historic properties following consultation with the Council.

Special Topics in Historic Preservation

Balancing Historic Preservation Needs with the Operation of Highly Technical or Scientific Facilities. 79 pp. February 1991. Written in response to congressional request, this report identifies ways in which preservation needs may be reconciled with ongoing operational needs at highly technical and scientific facilities such as Yerkes Observatory and the Marshall Spaceflight Center.

Fire Safety Retrofitting in Historic Buildings. 24 pp. August 1989. Gives specific examples of methods for retrofitting fire safety systems into historic buildings that will ensure public safety and protection of property while avoiding damage to distinctive historic features.

Federal Historic Preservation Law

National Historic Preservation Act of 1966, as amended. 56 pp. 1993. The up-to-date text of the National Historic Preservation Act.

Federal Historic Preservation Case Law. 88 pp. July 1985. Explains the current status of federal historic preservation law, describes the provisions of major preservation authorities, discusses procedural issues in litigating preservation cases, and digests 89 cases decided in federal courts since 1966.

Archeology

Fact Sheet: Consulting About Archeology Under Section 106. 14 pp. September 1990. Provides guidance on how the Section 106 review process addresses a variety of archeological issues.

Treatment of Archeological Properties: A Handbook. 39 pp. May 1991. Presents basic principles for designing a program to handle archeological properties, interprets the Council's regulations as they relate to archeological concerns, provides detailed recommendations for when a decision has been made to conduct data recovery or salvage excavations, and gives examples of significant archeological research questions.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX H: National Register Technical Bibliography

National Register Bulletins

National Register bulletins provide guidance on a variety of topics related to the survey, evaluation, registration, and listing of historic properties in the National Register of Historic Places. They are available from the National Register of Historic Places. Those applicable to park cultural resource management follow.

Bulletin 2: Nomination of Deteriorated Buildings to the National Register. Rev. 1982. Describes instances in which the National Register will list vacant, abandoned, and deteriorated buildings.

Bulletin 4: Contribution of Moved Buildings to Historic Districts. Rev. 1987. Guidelines for determining when a moved building can contribute to a National Register or certified local district.

Bulletin 6: Nomination of Property Significant for Association with Living Persons. Rev. 1982. Discusses when it is appropriate to nominate properties whose historical associations are with living persons.

Bulletin 7: Definition of Boundaries for Historic Units of the National Park System. Rev. 1982. Explains how National Register boundaries are defined.

Bulletin 12: Definition of National Register Boundaries for Archeological Properties. 1985. Using case studies, recommends approaches for delineating boundaries for commonly encountered archeological properties.

Bulletin 14: Guidelines for Counting Contributing and Noncontributing Resources for National Register Documentation. Rev. 1986. Provides guidance for distinguishing and counting contributing and noncontributing resources composing a documented property, regardless of size or complexity.

Bulletin 15: How to Apply the National Register Criteria for Evaluation. Rev. 1991. Explains how the NPS applies the criteria used to determine the eligibility of properties for listing in the National Register.

Bulletin 16: Guidelines for Completing National Register of Historic Places Forms. Rev. 1990. Part A provides information on completing the National Register Registration Form; Part B provides information on completing the Multiple Property Documentation Form.

Bulletin 18: How to Evaluate and Nominate Designed Historic Landscapes. 1987. Explains the process by which designed historic landscapes are documented, evaluated, and nominated to the National Register.

Bulletin 19: Policies and Procedures for Processing National Register Nominations. 1987. Explains procedures for processing nominations; describes common documentation problems and how they are addressed.

Bulletin 20: Nominating Historic Vessels and Shipwrecks to the National Register of Historic Places. 1987. Guidelines for identifying, evaluating, and documenting a variety of historic vessels as well as shipwrecks.

Bulletin 21: How to Establish Boundaries for National Register Properties. Guidelines and examples of how to determine National Register boundaries.

Bulletin 22: Guidelines for Evaluating and Nominating Properties that Have Achieved Significance Within the Last Fifty Years. Rev. 1989. Guidance for evaluating the "exceptional importance" required for listing properties that have achieved significance within the last fifty years.

Bulletin 23: How to Improve the Quality of Photos for National Register Nominations. 1979. Suggestions to help photographers achieve better quality photographic documentation of buildings and architectural details.

Bulletin 24: Guidelines for Local Surveys: A Basis for Preservation Planning. Rev. 1985. Guidance for undertaking surveys of historic resources.

Bulletin 28: Using the UTM Grid System to Record Historic Sites. Rev. 1977. Introduces the Universal Transverse Mercator (UTM) Grid System and its application to mapping historic and archeological sites.

Bulletin 29: Guidelines for Restricting Information About Historic and Prehistoric Resources. 1990. Guidance on which historic resources should be protected by restricting information about their location and character.

Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes. 1990. Includes definition of rural landscape, description of characteristics, practical methods for survey and research, application of National Register criteria, and registration requirements.

Bulletin 32: Guidelines for Evaluating and Documenting Properties Associated with Significant Persons. 1989. Updated information on interpreting Criterion B.

Bulletin 33: National Register Information System Manual for State and Federal Users. 1987. Designed for users of the National Register Information System (NRIS), the database of properties listed in, determined eligible for, or pending listing in the National Register.

Bulletin 34: Guidelines for Evaluating and Documenting Historic Aids to Navigation. 1990. Guidance on evaluating the significance and integrity of historic lighthouses, daymarks, and sound signals, as well as preparing National Register and other preservation planning documentation.

Bulletin 35: National Register Casebook: Examples of Documentation. 1988—89. Examples of multiple property case studies, maritime nominations, and concise nominations.

Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties. 1990. Guidance in determining whether properties of traditional and religious cultural significance are eligible for inclusion in the National Register.

Bulletin 39: Researching a Historic Property. 1990. Provides basic information on methods of researching an individual building for listing in the National Register.

Bulletin 40: Guidelines for Identifying, Evaluating, and Registering America's Historic Battlefields. 1992.

Bulletin 41: Guidelines for Evaluating and Registering Cemeteries and Burial Places. 1992.

Other Publications

The following is available from John Wiley and Sons, 1 Wiley Drive, Somerset, NJ 08875:

The National Register of Historic Places, 1966 to 1994. The latest publication of the more than 62,000 listings in the National Register. $98.00 plus $2.50 handling prepaid.

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NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX I: Selected History and Historical Interpretation Bibliography

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NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX J: Archeology Bibliography

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Technical Brief 3. *Archeology in the National Historic Landmarks Program*, by Robert S. Grumet, Mid-Atlantic Regional Office, National Park Service, 1988.

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Technical Brief 6. *The Kentucky Archaeological Registry: Landowner Participation in Site Preservation*, by A. Gwynn Henderson, Kentucky Nature Preserves Commission, 1989.

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Technical Brief 13. *Managing Archeological Resources from the Museum Perspective*, by Lynne Sullivan, New York State Museum, 1992.

Technical Brief 14. *The Peer Review of Public Archeology Projects: A Procedure Developed by the Departmental Consulting Archeologist*, by Bennie C. Keel, Southeast Archeological Center, National Park Service, 1993.

Technical Brief 15. *State Archeology Weeks: Interpreting Archeology for the Public*, by Mara Greengrass, Archeological Assistance Division, National Park Service, 1993.

Technical Brief 16. *The Civil Prosecution Process of the Archaeological Resources Protection Act*, by Sherry Hutt, Judge, Superior Court, Maricopa County, Arizona, 1994.

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Study 3. *A Survey of State Statutes Protecting Archeological Resources*, by Carol L. Carnett, 1995. For purchase from the National Trust for Historic Preservation, 1785 Massachusetts Avenue NW, Washington, DC 20036.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX K: Selected Cultural Landscape Bibliography

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NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX L: Historic and Prehistoric Structure Technical Bibliography

All of these items have been produced or sponsored by the National Park Service. The letters at the right of each entry refer to the availability key on page 277.

Identification, Evaluation, Registration

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80-004 *Use of Historically Inappropriate Details* by Floy A. Brown.

80-005 *Use of Historically Inappropriate Materials* by Floy A. Brown.

80-006 *Installation of Artificial Siding and Loss of Decorative Features* by Floy A. Brown.

80-007 *Appropriate Location of Greenhouse Additions* by Floy A. Brown, Judith Kitchen.

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81-010 *New Construction as Connector Infill* by Sharon C. Park, A.I.A.

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81-012 *Demolition as Part of Certified Rehabilitation* by H. Ward Jandl.

81-013 *Exposed Interior Brickwork: Warehouse and Commercial Buildings* by Rudy Massengill.

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81-019 *Alterations to Significant Interior Spaces* by William G. MacRostie.

81-020 *Interior Alterations to Accommodate New Functions* by Sharon C. Park, A.I.A.

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81-022 *Appropriate Scale of Greenhouse Additions* by William G. MacRostie.

81-023 *Use of Urea-Formaldehyde Foam Insulation in Wood Framed Buildings* by Baird M. Smith, A.I.A., Sharon C. Park, A.I.A.

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82-025 *Entryway Alterations in Carriage House Conversions* by Christopher A. Sowick.

82-026 *New Additions to Historic Buildings* by Jean E. Travers.

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82-031 *Inappropriate Alterations to Roofs* by Anne E. Grimmer.

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82-033 *Inappropriate Porch Enclosure Treatments on Significant Rear Facades* by Charles E. Fisher.

82-034 *Adding Additional Floors to Historic Buildings* by H. Ward Jandl.

82-035 *Inappropriate Window Replacement* by William G. MacRostie.

82-036 *Using Nonhistoric Finishes on Exterior Woodwork* by Kay D. Weeks.

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82-038 *Replacement of Deteriorated Roofing Materials* by Christopher A. Sowick.

82-039 *Removing Paint from Exterior Woodwork Using Inappropriate Methods* by Kay D. Weeks.

82-040 *Substitute Materials or Suitable Replacement Materials for Sandstone* by Anne E. Grimmer.

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82-042 *Inappropriate Replacement Materials: Changes in Color and Texture* by Sara K. Blumenthal.

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83-048 *Inappropriate Exterior Alterations: Warehouse to Apartments* by Sharon C. Park, A.I.A.

83-049 *Inappropriate Storefront Alterations* by Michael J. Auer.

83-050 *New Openings in Blank Exterior Walls* by Sara K. Blumenthal.

83-051 *Contemporary Additions* by Sharon C. Park, A.I.A.

83-052 *Compatible, Non-Matching Replacement Window Sash* by Jean E. Travers.

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84-054 *Replacing Repairable Historic Interior/Exterior Features and Materials* by Kay D. Weeks, Martha L. Werenfels.

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84-056 *Replacing Severely Deteriorated Historic Materials* by Susan Dynes, Kay D. Weeks.

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84-059 *Replacing a Significant Interior Feature to Meet Health and Safety Code Requirements* by Kay D. Weeks.

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84-064 *Extensive Replacement of Historic Materials/Features: Loss of Integrity* by Kay D. Weeks.

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85-068 *Removal or Alteration of Historic Site Features* by Susan Dynes.

85-069 *Factors to Weigh in Evaluating Damaged/Deteriorated Buildings* by Kay D. Weeks.

85-070 *Removing False Fronts or Nonhistoric Surface Coverings Prior to Rehabilitation* by Kay D. Weeks.

85-071 *Proposed Rooftop Addition on Building with a Distinctive Cornice* by Sharon C. Park, A.I.A., Michael J. Auer.

85-072 *Preserving Distinctive Side and Rear Elevations* by Kay D. Weeks.

85-073 *Alternative Rehabilitation Treatments for Later Non-Significant Additions* by Anne E. Grimmer.

85-074 *Rooftop Additions* by Charles E. Fisher.

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86-079 *Compatibility Versus Reversibility in New Additions to Historic Buildings* by Jean E. Travers.

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87-081 *Interior Alterations Resulting in Loss of Air/Light Shaft* by Anne E. Grimmer.

87-082 *Alterations to Interior Layouts* by Michael J. Auer.

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87-084 *Subdivision of Significant Spaces* by Michael J. Auer.

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87-086 *Matching the Historic Window Design and Detail when Replacement is Necessary* by Kay D. Weeks.

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88-096 *Undocumented "Restoration" of Missing Architectural Elements* by Anne E. Grimmer.

88-097 *Incompatible Site Work* by Michael J. Auer.

88-098 *Change to Historic Settings* by Michael J. Auer, Amy Schlagel.

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88-100 *Alternations of Floor Plans and Interior Features* by Camille M. Martone.

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88-103 *Adjacent New Construction* by Michael J. Auer.

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89-113 *Rehabilitation and Adaptive Use of Schools* by Mary Jo Rendon.

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89-116 *Preservation of Historic Industrial Character Using Modern Replacement Materials* by Rebecca A. Shiffer.

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[a.] Preservation Briefs

(Preservation Briefs 1—14 are available as a set for $13.00. GPO Stock No. 024-005-01026-2. Preservation Briefs 15—23 are available as a set for $5.00. GPO Stock No. 024-005-01085-8. Preservation Briefs 24—34 are available as a set for $14.00. GPO Stock No. 024-005-01147-1.)

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b. *Exterior Cleaning of Historic Masonry Buildings* by Norman R. Weiss. February 1977. NTIS Order No. PB85-180818.

A Selected Bibliography on Wood Deterioration and Preservation compiled by Baird M. Smith, A.I.A. February 1977. Out of print.

b. *Wallpapers in Historic Preservation* by Catherine Lynn Frangiamore. March 1977. NTIS Order No. PB85-180784.

b. *Preservation of Historic Adobe Structures–A Status Report* by James R. Clifton. February 1977. NTIS Order No. PB-264 137/1.

b. *Stone Preservatives: Methods of Laboratory Testing and Preliminary Performance Criteria* by Gerald A. Sleater. May 1977. NTIS Order No. PB-266 041/3.

A Selected Bibliography on Stone Preservation compiled by C. Hoffey, K. Gray, Technical Preservation Services. June 1977. Out of print.

A Selected Bibliography on Building Codes and Standards compiled by Baird M. Smith, A.I.A. September 1977. Out of print.

Preliminary Performance Criteria for Stone Preservatives by Gerald A. Sleater. 1977. Out of print.

A Selected Bibliography on Energy Conservation in Historic Buildings by Baird M. Smith, A.I.A. Out of print.

b. *Epoxies for Wood Repairs in Historic Buildings* by Morgan W. Phillips, Dr. Judith E. Selwyn. April 1978. NTIS Order No. PB85-180834.

b. *The Effects of Herbicides on Masonry* by James E. Fearn. May 1978. NTIS Order No. PB-281 563/7.

b. *Methods for Characterizing Adobe Building Materials* by James R. Clifton, Paul W. Brown, Carl R. Robbins. June 1978. NTIS Order No. PB-282 062/9.

b. *Factors Affecting the Durability of Adobe Structures* by Paul Wencil Brown, Carl R. Robbins, James R. Clifton. July 1978. NTIS Order No. PB-286 096/3.

b. *Protecting Adobe Walls from Ground Water* by James R. Clifton, Frankie Davis. March 1979. NTIS Order No. PB-295 041/8.

b. *Mechanical Properties of Adobe* by James R. Clifton, Frankie L. Davis. May 1979. NTIS Order No. PB-297 843/5.

b. *Feasibility Study on the Use of a Microwave System for the Non-destructive Evaluation of Historic Adobe Structures* by D. R. Belsher. July 1979. NTIS Order No. PB-298 559/6.

b. *Stone Consolidating Materials-A Status Report* by James R. Clifton. May 1980. NTIS Order No. PB80-202922.

b. *Access to Historic Buildings for the Disabled: Suggestions for Planning and Implementation* by Charles Parrott. 1980. NTIS Order No. PB85-180826.

Rehabilitation of Historic Buildings: An Annotated Bibliography compiled by Frederec E. Kleyle. 1980. Out of print.

Energy Conservation and Solar Energy for Historic Buildings: Guidelines for Appropriate Designs by Thomas Vonier Associates. November 1981. Out of print.

s. *Respectful Rehabilitation: Answers to Your Questions About Old Buildings* by the National Park Service. September 1982. $14.95.

Energy Conserving Features Inherent in Older Homes by John A. Burns, A.I.A. 1982. Out of print.

Historic Districts Made Energy Efficient: A Case Study by Glance and Associates. 1982. Out of print.

b. *The Use of Sealants in Masonry Joints* by M. Gadette, James R. Clifton. 1982. NTIS Order No. PB87-200150.

b. *Vegetative Threats to Historic Sites and Structures* by Robert A. Warnock, Lila Fendrick, Barbara E. Hightower, Terry Denise Tatum. January 1983. NTIS Order No. PB83-250373.

b. *Acidic Deposition and the Corrosion and Deterioration of Materials in the Atmosphere* by D. R. Flinn et al. July 1983. NTIS Order No. PB83-236091.

d. *Accommodation of Disabled Visitors at Historic Sites in the National Park System* by Duncan S. Ballantyne. 1983. NTIS Order No. PB85-103711.

b. *Effects of Acid Deposition on Materials and Cultural Resources* by S. Sherwood, F. W. Lipfert. April 1984. NTIS Order No. PB85-003605.

b. *Procedure for Tristimulus Color on Building Stone* by L.I. Knab. October 1984. NTIS Order No. PB85-133981.

Moisture Problems in Historic Masonry Walls: Diagnosis Treatment by Baird M. Smith, A.I.A. l984. Out of print.

b. *A Glossary of Historic Masonry Deterioration Problems and Preservation Treatments* by Anne E. Grimmer. l984. NTIS Order No. PB92-147172.

Fire Safety Evaluation System User's Guide for National Park Service Overnight Accommodations by the National Bureau of Standards. 1984. Out of print.

Integrated Pest Management Information Manual. 1984. Out of print.

b. *Using Photogrammetry to Monitor Materials Deterioration and Structural Problems on Historic Buildings* by J. Henry Chambers, F.A.I.A. 1985. NTIS Order No. PB87-232146.

Materials Testing Labs for Historic Buildings, Technical Preservation Database. May 1987. Out of print.

c. *Performance of Historic Building Materials and Systems: Observations by Architects, Engineers and Building Conservators* by Emogene A. Bevitt, editor. June 1988.

Masonry Products for Historic Buildings, Technical Preservation Database. September 1988. Out of print.

a. *Keeping It Clean: Removing Exterior Dirt, Paint, Stains, and Graffiti from Historic Masonry Buildings* by Anne E. Grimmer. 1988. GPO Stock No. 024-005-01035-1: $2.50.

l. *The Interiors Handbook for Historic Buildings* by Charles E. Fisher III, Michael J. Auer, Anne Grimmer, editors. 1988. $56.00 including shipping and handling.

l. *The Interiors Handbook for Historic Buildings, Volume II* by Michael J. Auer, Charles E. Fisher, Thomas C. Jester, Marilyn E. Kaplan, editors. 1993. $49.50 including shipping and handling.

(l. *The Interiors Handbook for Historic Buildings, Volumes I and II* are available as a set for $95.00 including shipping and handling.)

s. *Masonry, How to Care for Old and Historic Brick and Stone* by Mark London. 1988. $12.95.

d. *Earthworks Landscape Management Manual* by Andropogen Associates, Ltd. 1989.

c. *Historic Building Interiors, An Annotated Bibliography* compiled by Anne E. Grimmer. 1989.

c. *Preserving Historic Lighthouses, An Annotated Bibliography* compiled by Camille M. Martone, Lauren McCroskey, Sharon C. Park, A.I.A. 1989.

k. *Effects of Acidic Deposition on Materials*, Report 19, September 1990.

k. *Processes of Deposition to Structures*, Report 20, October 1990.

k. *Distribution of Materials Potentially at Risk from Acidic Deposition, Report 21*. November 1990.

l. *The Window Handbook: Successful Strategies for Rehabilitating Window in Historic Buildings* by Charles E. Fisher III, editor. 1990. $32.00 including shipping and handling.

The Window Workbook for Historic Buildings. 1992. Out of print.

c. *Maintaining Historic Buildings, An Annotated Bibliography* compiled by Kaye Ellen Simonson. 1990.

s. *Wall & Molding, How to Care for Old and Historic Wood and Plaster* by Natalie Shivers. 1990. $16.95.

o. *Gaslighting in America: A Guide for Historic Preservation* by Denys Peter Myers. 1990. $16.95.

h. *The Preservation of Outdoor Monuments* by Kathleen Catalano Milley, Dennis R. Montagna, Rebecca A. Shiffer, compilers and editors. 1991.

n. *The Seismic Retrofit of Historic Buildings Conference Workbook* by David W. Look, A.I.A., editor. 1991. $50.00 including shipping and handling.

r. *Moving Historic Buildings* by John Obed Curtis. 1991. $2.50 plus $1.50 for shipping and handling.

s. *Repairing Old and Historic Windows: A Manual for Architects and Homeowners* by the New York Landmarks Conservancy. 1992. $24.95.

a. *Metals in America's Historic Buildings: Uses and Preservation Methods* by Margot Gayle, David W. Look, A.I.A. (Part I); John G. Waite, A.I.A. (Part II). 1992. GPO Stock No. 024-005-01108-1: $10.00.

c. *Window Directory for Historic Buildings*. 1992.

t. *Accessibility and Historic Preservation: Resource Guide* by Thomas C. Jester, Judith Hayward. 1992: $50.00, $55.00 with videotape.

Preserving Wood Features in Historic Buildings: An Annotated Bibliography compiled by Erica C. Avrami; *Painting Historic Buildings: Materials and Techniques: An Annotated Bibliography* compiled by Marianne Bevil, Meredith Fiske, Anne-Leslie Owens; *Historic Masonry Deterioration and Repair Techniques, An Annotated Bibliography* compiled by Catherine Carosino et al.; *Historic Concrete, An Annotated Bibliography* compiled by Adrienne Beaudet Cowden; *Twentieth Century Building Materials: 1900—1950, An Annotated Bibliography* compiled by George M. Bleekman III et al., edited by Anne E. Grimmer. 1993. Out of print.

l. *Preserving the Recent Past* by Deborah Slaton, Rebecca A. Shiffer, editors. 1995. $49.00 including shipping and handling.

q. *Twentieth Century Building Materials: History and Conservation* by Thomas C. Jester, editor. $55.00 plus $3.00 for shipping and handling.

l. *Window Rehabilitation Guide for Historic Buildings* by Charles E. Fisher III, Deborah Slaton, Rebecca A. Shiffer, editors. 1997. $50.00 including shipping and handling.

a. *Historic Lighthouse Preservation Handbook.* 1997. GPO Stock No. 024-005-01181-1: $30.00 without binder.

g. *Maintenance Management for Systems Managers Training Manual*. September 1991.

g. *Maintenance Management Data Entry and Reports Training Workbook*. September 1991.

g. *Maintenance Management Operations Manual, Part 1*. December 1990.

g. *Maintenance Management Operations Manual, Part 2*. December 1990.

g. *Maintenance Management Desk Reference Manual*. April 1987.

d. *Inventory and Condition Assessment Program Reference Manual*. Version 2.0.3, 1997.

d. *Inventory and Condition Assessment Program Training Manual*. Version 2.0, 1993.

d. *Inventory and Condition Assessment Program Training Workbook*. Version 2.0, 1993.

Computer Software

g. *Maintenance Management Software*. Version 2.4, 1996.

g. *Maintenance Management Computer User Manual*. Version 2.3, 1994.

d. *Inventory and Condition Assessment Program Software*. Version 2.0.3, 1997.

d. *Inventory and Condition Assessment Program Computer User Manual*. Version 2.0.3, 1997.

d. *Inventory and Condition Assessment Program Computer-Based Tutorial*. Version 2.0, 1993.

d. *Historic Property Preservation Database*. 1993.

Videotapes

j. Maintenance Training–Historic Preservation (1974)

(Black and white, 1/2 inch, reel-to-reel, each about 30 minutes)

Restoration of Masonry Wall (Stone) by Sam May.

Restoration of Roof (Wood and Slate Shingles) by Bob Voorhees.

Restoration of Interior Fabric (Interior Woodwork) by Doug Hicks, Jim Askins.

Restoration of Trim and Molding by Gordie Whittington.

Painting by Gene Goldsmith, Blaine Cliver.

Historic Structure Report and Evaluation by Jim Wollon, Dick Hsu, Hugh Miller.

j. *Structural Inspections–A Way of Managing Wood-Inhabiting Insects* (1987) (Color, VHS, 23 minutes).

j. *Videotaping Historic Structures* (1987) (Color, VHS, 20 minutes).

j. *Adobe Preservation: Basic Concepts and Approaches* (1988) (Color, VHS, 28 minutes).

j. *Level III Graphic Documentation* (1988) (Color, VHS, 26 minutes).

j. *Wood Rehabilitation at the Old Santa Fe Trail Building* (1988) (Color, VHS, 15 minutes).

g. *NPS Maintenance Management–An Overview* (1987) (Color, VHS, 16 minutes).

g. *Maintenance Management Software–Data Entry and Reports* (1991) (Color, VHS, 30 minutes).

g. *Maintenance Management, A Tool for Managers in Decision Making* (1993) (Color, VHS, 17 minutes).

j. *Characterization of Earthen Building Materials* (1992) (Color, VHS, 60 minutes).

j. *Inspecting Historic Structures* (1992) (Color, VHS).

t. *Access and Historic Preservation: Entrances to the Past* by Kay D. Weeks, Kay Ellis, David C. Parks. (1993) (Color, VHS, 29 minutes): $13.00.

j. *Caution Lead Paint Hazard* (1993) (Color, VHS, 14 minutes).

[j.] Slide Tapes

Accommodation of Handicapped Visitors at Historic Sites by Harold Russell Associates, Inc., and ES-TEE Film Productions. 1979.

Professional Development

d. *Skills Development Plan for Historical Architects in the National Park Service* by Hugh C. Miller, A.I.A., Lee H. Nelson, F.A.I.A., Emogene A. Bevitt. May 1986. NTIS Order No. PB88-192265.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX M: Museum Objects Technical Bibliography

NPS Handbooks, Manuals, and Key Documents

Automated National Catalog System (ANCS) User Manual. April 1987. Developed to computerize accessioning and cataloging, the ANCS has wide-ranging application for both cultural objects and natural history specimens.

Museum Handbook, Part I, Museum Collections (Revised). September 1990. Part I provides guidance on scope of collections; environmental monitoring and control; pest management; museum collections storage; handling, packing, and shipping objects; conservation treatment; security and fire protection; emergency planning; curatorial health and safety; planning and programming for museum collections management; and museum ethics. This part of the handbook also addresses preventive conservation for various classes of museum objects.

Museum Handbook, Part II, Museum Records. September 1984. Part II provides guidance on documentation and accountability for cultural collections and natural history collections. The topics addressed include accessioning, cataloging, inventorying, marking, and record photography. New chapters on outgoing loans and deaccessioning are included.

Museum Handbook, Part III, Use of Museum Collections (draft in progress). Part III will provide guidance on uses of collections in exhibits, interpretive and educational activities, and research; motion pictures and photography; reproductions; office art; publications; and use of collections by Native American and other ethnic groups.

Standards for NPS Museum Collections Management. Director's Order 24, 1996. This order outlines the NPS standards and requirements for museum collections storage, exhibits, museum environment, security, fire protection, housekeeping, and museum collections planning.

Tools of the Trade: A Listing of Materials and Equipment for Managing Museum Collections. September 1990 (draft update in progress). This publication provides a description of and suggested sources for recordkeeping supplies; storage containers; specialty curatorial items, natural history supplies; museum cabinetry, shelving, and shelving racks; and environmental monitoring and control apparatus.

Technical Publications

Cumberland, Donald R., Jr. *Museum Collection Storage in an Historic Building Using a Prefabricated Structure*. Preservation Tech Notes: Museum Collections, No. 1. September 1985.

_____. *Collection Storage–Making a Case for Microenvironments*. Supplement to *CRM*, vol. 15, no. 4, 1992.

Hunter, John E. *Filing Cabinets and Safes for Protection of Paper Records, Computer Media, and Photographic Records from Fire Damage*. Supplement to *CRM*, vol. 16, no. 5, 1993.

NPS Conserve O Gram Series (Revised). July 1993. This series consists of brief technical leaflets distributed periodically to provide park and museum staff with a wide variety of timely information on specific procedures and techniques for storage, exhibit mounting, and preventive care and maintenance; curatorial health and safety updates; and sources of assistance and supplies.

Sheetz, Ron, and Charles Fisher. *Reducing Visible and Ultraviolet Light Damage to Interior Wood Finishes*. Preservation Tech Notes: Museum Collections, No. 2. September 1990.

Scholarly or Professional Publications

American Association of Museums. *Museum News* (bimonthly journal) and *Aviso* (monthly newsletter).

_____. *Museum Ethics*. Washington, DC: American Association of Museums, 1991.

American Association for State and Local History. *History News* (bimonthly journal) and *History News Dispatch* (monthly newsletter).

American Institute for Conservation of Historic and Artistic Works. *Journal of the American Institute for Conservation* (biannual journal), *AIC Newsletter* (bimonthly newsletter), and the *Code of Ethics and Standards of Practice of the American Institute for Conservation of Historic and Artistic Works*.

Burke, Robert B., and Sam Adeloye. *A Manual of Basic Museum Security*. Rome: International Council of Museums, 1986.

Case, Mary, ed. *Registrars on Record: Essays on Museum Collections Management*. Washington: American Association of Museums, 1988.

de Torres, Amparo R., ed. *Collections Care: A Selected Bibliography*. Washington: National Institute for the Conservation of Cultural Property, 1990.

Ellis, Judith, ed. *Keeping Archives* (second edition). Port Melbourne, Australia: D. W. Thorpe with Australian Society of Archivists, 1993.

Hensen, Steven L., comp. *Archives, Personal Papers, and Manuscripts: A Cataloging Manual for Archival Repositories, Historical Societies, and Manuscript Libraries*. Chicago: Society of American Archivists, 1989.

Herholdt, Elizabeth M., ed. *Natural History Collections: Their Management and Value*. Pretoria: Transvaal Museum, 1990.

Johnson, E. Verner, and Joanne C. Horgan. *Museum Collections Storage*. Paris: United Nations Educational, Scientific, and Cultural Organization (UNESCO), 1979.

Jones, Barclay G., ed. *Protecting Historic Architecture and Museum Collections from Natural Disasters*. Boston: Butterworths, 1986.

Karp, Ivan, and Steven D. Lavine, eds. *Exhibiting Cultures: The Poetics and Politics of Museum Display*. Washington: Smithsonian Institution Press, 1990.

Lewis, Ralph H. *Museum Curatorship in the National Park Service, 1904—1982*. Washington: National Park Service, 1993.

Malaro, Marie C. *A Legal Primer on Managing Museum Collections*. Washington: Smithsonian Institution Press, 1985.

Miller, E. H., ed. *Museum Collections: Their Roles and Future in Biological Research*. Vancouver: British Columbia Provincial Museum, 1985.

Museum Computer Network. *Spectra: The International Journal of Computer Applications in Museums*.

National Fire Protection Association. *NFPA 911 Standard: Protection of Museums and Museum Collections*. Quincy, MA: National Fire Protection Association, 1991.

Phelan, Marilyn. *Museums and the Law*. Nashville: American Association for State and Local History, 1982.

Smiraglia, Richard P., ed. *Describing Archival Materials: The Use of the MARC AMC Format*. New York: Haworth Press, 1990.

Society for the Preservation of Natural History Collections. *Collection Forum* (biannual journal) and *SPNHC Newsletter* (quarterly newsletter).

Society of American Archivists. *The American Archivist* (quarterly journal), *Basic Manual Series*, *SAA Newsletter* (bimonthly newsletter), and *A Code of Ethics for Archivists*.

Thompson, John M. A., ed. *The Manual of Curatorship*. Stoneham, MA: Butterworths, 1992.

Thomson, Garry. *The Museum Environment*. 2d ed. Stoneham, MA: Butterworths, 1986.

Ward, Phillip R. *The Nature of Conservation: A Race Against Time*. Santa Monica, CA: J. Paul Getty Institute, 1987.

Whelchel, Harriet, ed. *Caring for Your Collections*. (The National Committee to Save America's Collections.) New York: Harry N. Abrams, 1992.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX N: Selected Ethnographic Resources Bibliography

Allen, James P., and Eugene J. Turner. *We the People: An Atlas of America's Ethnic Diversity*. New York: Macmillan, 1987.

Arrington, Leonard J., and Davis Bitton. *The Mormon Experience: A History of the Latter-day Saints*. Urbana: University of Illinois Press, 1992.

Bennett, John W. *Human Ecology as Human Behavior: Essays in Environmental and Development Anthropology*. New Brunswick, NJ: Transaction Publishers, 1996.

Boxberger, Daniel L. *To Fish In Common: The Ethnohistory of Lummi Indian Salmon Fishing*. Lincoln: University of Nebraska Press, 1989.

Bullchild, Percy. *The Sun Came Down*. San Francisco: Harper and Row, 1985.

Capoeman, Pauline K., ed. *Land of the Quinault*. Taholah, WA: Quinault Indian Nation, 1990.

Castile, George Pierre, and Gilbert Kushner, eds. *Persistent Peoples: Cultural Enclaves in Perspective*. Tucson: University of Arizona Press, 1981.

Doob, Leonard W., ed. *Contribution in Ethnic Studies*. Number 25. New York: Greenwood Press, 1989.

Dutton, Berta P. *American Indians of the Southwest*. Albuquerque: University of New Mexico Press, 1984 (first published 1975).

Ellanna, Linda J., and Andrew Balluta. *Nuvendaltin Ouht'ana: The People of Nondalton*. Washington: Smithsonian Institution, 1992.

Emmons, George Thornton, and Frederica de Laguna, eds. *The Tlingit Indians*. Seattle: University of Washington Press, 1991.

Feldman, Elliot J. *A Practical Guide to the Conduct of Field Research in the Social Sciences*. Boulder, CO: Westview, 1981.

Fox, Steven. *Cultural Ecological Patterns of the Eastern Shoshoni*. Pocatello, ID: University Museum of Natural History, 1976.

Grobsmith, Elizabeth S. *Lakota of the Rosebud: A Contemporary Ethnography*. New York: Holt, Rinehart, and Winston, 1981.

Haeberlin, Hermann, and Erna Gunther. *The Indians of Puget Sound*. Seattle: University of Washington Press, 1930 (14th printing 1988).

Hertzberg, Hazel W. *The Search for an American Indian Identity: Modern Pan-Indian Movements*. Syracuse: Syracuse University Press, 1971.

Hunn, Eugene S., and James Selam. *Nchi'i-Wana, "The Big River": Mid-Columbia Indians and Their Land*. Seattle: University of Washington Press, 1991.

Jorgensen, Joseph. *Oil Age Eskimos*. Berkeley: University of California Press, 1990.

Kehoe, Alice B. *The Ghost Dance: Ethnohistory and Revitalization*. Fort Worth: Holt, Rinehart and Winston, 1989.

Klein, Barry T. *Reference Encyclopedia of the American Indian*. 5th ed. West Nyack, NY: Todd Publishers, 1990.

Kodama-Nishimoto et al. *Hanahana: An Oral History Anthology of Hawaii's Working People*. Ethnic Studies Oral History Project. Manoa: University of Hawaii, 1984.

Langness, L. L., and Gelya Frank. *Lives: An Anthropological Approach to Biography*. Novato, CA: Chandler and Sharp, 1981.

Linnekin, Jocelyn. *Children of the Land: Exchange and Status in a Hawaiian Community*. New Brunswick, NJ: Rutgers University Press, 1985.

McClellan, Catharine. *My Old People Say: An Ethnographic Survey of Southern Yukon Territory*. 2 vols. Ethnological Publications No. 6., Part I. Ottawa: National Museum of Canada, 1983.

McFee, Malcom. *Modern Blackfeet: Montanans on a Reservation*. New York: Holt, Rinehart, and Winston, 1972.

Myerhoff, Barbara G. et al. *Remembered Lives: The Work of Ritual, Storytelling, and Growing Older*. Ann Arbor: University of Michigan Press, 1992.

Nelson, Richard K. *Make Prayers to the Raven*. Chicago: University of Chicago Press, 1983.

Powers, Marla N. *Oglala Women: Myth, Ritual and Reality*. Chicago: University of Chicago Press, 1986.

Prucha, Francis Paul. *The Indians in American Society: From the Revolutionary War to the Present*. Berkeley: University of California Press, 1988.

Sando, Joe S. *Pueblo Nations: Eight Centuries of Pueblo Indian History*. Santa Fe: Clear Light Publishers, 1992.

Spicer, Edward H. *Cycles of Conquest: The Impact of Spain, Mexico, and the United States on the Indians of the Southwest*. Tucson: University of Arizona Press, 1962.

Spradley, James P. *The Ethnographic Interview*. New York: Holt, Rinehart, and Winston, 1979.

_____. *Participant Observation*. New York: Holt, Rinehart, and Winston, 1980.

Sturtevant, William C., gen. ed. *Handbook of North American Indians.* Washington: Smithsonian Institution; see following volumes:

4: Washburn, Wilcomb E., ed. *History of Indian-White Relations*. 1989.

5: Damas, David, ed. *Arctic*. 1984.

6: Helm, June, ed. *Subarctic*. 1981.

7: Suttles, Wayne, ed. *Northwest Coast*. 1990.

8: Heizer, Robert F., ed. *California*. 1978.

9: Ortiz, Alfonso, ed. *Southwest*. 1980.

10: Ortiz, Alfonso, ed.*Southwest*. 1983.

11: d'Azevedo, Warren L., ed. *Great Basin*. 1986.

15: Trigger, Bruce G., ed. *Northeast*. 1979.

Swanton, John. *The Indian Tribes of North America*. Bureau of American Ethnology Bulletin 145. Washington: Smithsonian Institution, 1952.

Takaki, Ronald. *Strangers from a Different Shore: A History of Asian Americans*. New York: Penguin, 1989.

Thernstrom, Stephan, ed. *Harvard Encyclopedia of American Ethnic Groups*. Cambridge, MA: Harvard University Press, 1980.

van Willigen, John. *Applied Anthropology: An Introduction*. South Hadley, MA: Bergin and Garvey, 1986.

van Willigen, John, and Timothy L. Finan, eds. *Soundings: Rapid and Reliable Research Methods for Practicing Anthropologists*. NAPA Bulletin No. 10. Washington: American Anthropological Assn., 1991.

Voget, Fred W. *The Shoshoni-Crown Sun Dance*. The Civilization of the American Indian Series, vol. 170. Norman: University of Oklahoma Press, 1984.

White, Richard. *Land Use, Environment, and Social Change: The Shaping of Island County*. Seattle: University of Washington Press, 1992.

White, Sid, and S. E. Solberg. *Peoples of Washington: Perspectives on Cultural Diversity*. Pullman: Washington State University Press, 1989.

Winthrop, Robert H. *Dictionary of Concepts in Cultural Anthropology*. Westport, CT: Greenwood Press, 1991.

Wood, Raymond, and Margot Liberty. *Anthropology on the Great Plains*. Lincoln: University of Nebraska Press, 1980.

National Park Service

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX O: Model Section 106 Form

ASSESSMENT OF ACTIONS HAVING AN EFFECT ON CULTURAL RESOURCES

A. DESCRIPTION OF UNDERTAKING

1. Park:_____ Park district (optional) _____

2. **Work/Project Description:**

a. Project name _____ date _____ park project no(s.) _____

b. Describe project and area of potential effects (as defined in 36 CFR 800.2[c]); explain why work/project is needed.

3. **Has the area of potential effects been surveyed to identify cultural resources?**

☐ No

☐ Yes Source or reference _____

☐ Check here if no known cultural resources will be affected. (If this is because area has been disturbed, please explain or attach additional information to show the disturbance was so extensive as to preclude intact cultural deposits.)

4. **Potentially Affected Resource(s):**

Name and number(s): _____ location: _____

NR status: _____

Name and number(s): _____ location: _____

NR status: _____ (REPEAT FOR EACH AFFECTED RESOURCE)

5. **The proposed action will:** (check as many as apply)

_____ Destroy, remove, or alter features/elements from a historic structure

_____ Replace historic features/elements in kind

_____ Add nonhistoric features/elements to a historic structure

_____ Alter or remove features/elements of a historic setting or environment (inc. terrain)

_____ Add nonhistoric features/elements (inc. visual, audible, or atmospheric) to a historic setting or cultural landscape

_____ Disturb, destroy, or make archeological resources inaccessible

_____ Disturb, destroy, or make ethnographic resources inaccessible

_____ Potentially affect presently unidentified cultural resources

_____ Begin or contribute to deterioration of historic features, terrain, setting, landscape elements, or archeological or ethnographic resources

_____ Involve a real property transaction (exchange, sale, or lease of land or structures)

_____ Other (please specify)

6. **Measures to prevent or minimize loss or impairment of historic/prehistoric properties:**

(Remember that setting, location, and use may be relevant.)

7. **Supporting Study Data:**

(Attach if feasible; if action is in a plan, EA or EIS, give name and project or page number.)

8. **Attachments:** [ ] Maps [ ] Archeological survey, if applicable [ ] Drawings [ ] Specifications [ ] Photographs [ ] Scope of Work [ ] Site plan [ ] List of Materials [ ] Samples [ ] Other _____

Prepared by_____ Date _____

Title _____ Telephone _____

B. REVIEWS BY CULTURAL RESOURCE SPECIALISTS

The park 106 coordinator requested review by the park's cultural resource specialist/advisers as indicated by check-off boxes or as follows:

SPECIALISTS: Your comments here (or attached) show that you have reviewed this proposal for conformity with requirements of Section 106, with the 1995 Servicewide PA (if applicable), and applicable parts of the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, the NPS *Management Policies*, and the NPS *Cultural Resource Management Guideline*, and have given your best professional advice about this project and the issues relevant to the Section 106 process, including identification and evaluation of historic properties and further consultation needs.

[ ] ARCHEOLOGIST

Name:

Date:

Comments:

Check if project does not involve ground disturbance [ ] Assessment of Effect: _____ No Effect _____ No Adverse Effect _____ Adverse Effect _____ Programmatic Exclusion

Recommendations for conditions or stipulations:

[ ] CURATOR

Name:

Date:

Comments

Assessment of Effect: _____ No Effect _____ No Adverse Effect _____ Adverse Effect _____ Programmatic Exclusion

Recommendations for conditions or stipulations:

[ ] ETHNOGRAPHER

Name:

Date:

Comments:

Assessment of Effect: _____ No Effect _____ No Adverse Effect _____ Adverse Effect _____ Programmatic Exclusion

Recommendations for conditions or stipulations:

[ ] HISTORIAN

Name:

Date:

Comments:

Assessment of Effect: _____ No Effect _____ No Adverse Effect _____ Adverse Effect _____ Programmatic Exclusion

Recommendations for conditions or stipulations:

[ ] HISTORICAL ARCHITECT

Name:

Date:

Comments:

Assessment of Effect: _____ No Effect _____ No Adverse Effect _____ Adverse Effect _____ Programmatic Exclusion

Recommendations for conditions or stipulations:

Check if project meets Secretary's Standards [ ]

Recommendations for conditions or stipulations:

[ ] HISTORICAL LANDSCAPE ARCHITECT

Name:

Date:

Comments:

Assessment of Effect: _____ No Effect _____ No Adverse Effect _____ Adverse Effect _____ Programmatic Exclusion

Recommendations for conditions or stipulations:

Check if project meets Secretary's Standards [ ]

Recommendations for conditions or stipulations:

[ ] OTHER ADVISERS

Name:

Title or area of specialty:

Date:

Comments:

Assessment of Effect: _____ No Effect _____ No Adverse Effect _____ Adverse Effect _____ Programmatic Exclusion

Recommendations for conditions or stipulations:

C. PARK SECTION 106 COORDINATOR'S REVIEW AND RECOMMENDATIONS

1. Assessment of Effect:

_____ No Effect _____ No Adverse Effect _____ Adverse Effect

2. Compliance requirements:

[ ] A. STANDARD 36 CFR PART 800 CONSULTATION

Further consultation under 36 CFR Part 800 is needed.

[ ] B. PROGRAMMATIC EXCLUSION UNDER THE 1995 SERVICEWIDE PROGRAMMATIC AGREEMENT (PA)

The above action meets all conditions for a programmatic exclusion under Stipulation IV of the 1995 Servicewide PA for Section 106 compliance.

APPLICABLE EXCLUSION: Exclusion IV.B _____ (Specify 1-13 or IV.C addition to thelist of exclusions.)

[ ] C. PLAN-RELATED UNDERTAKING

Consultation and review of the proposed undertaking were completed in the context of a plan review process, in accordance with the 1995 Servicewide PA and 36 CFR Part 800.

Specify plan/EA/EIS: _____

[ ] D. UNDERTAKING RELATED TO ANOTHER AGREEMENT

The proposed undertaking is covered for Section 106 purposes under another document such as a statewide agreement established in accord with 36 CFR 800.7 or counterpart regulations.

Specify: _____

[ ] E. STIPULATIONS/CONDITIONS

Following are listed any stipulations or conditions necessary to ensure that the assessment of effect above is consistent with 36 CFR Part 800 criteria of effect or to avoid or reduce potential adverse effects.

Recommended by Park Section 106 coordinator:

Name _____

Title _____

Date _____

D. SUPERINTENDENT'S APPROVAL

The proposed work conforms to the NPS *Management Policies* and *Cultural Resource Management Guideline*, and I have reviewed and approve the recommendations, stipulations, or conditions noted in Section C of this form.

Name/Signature of Superintendent _____

Date _____

SUPPLEMENTAL GUIDANCE

The Section 106 process is described in regulations promulgated by the Advisory Council on Historic Preservation as 36 CFR Part 800. PLEASE SEE ESPECIALLY 36 CFR 800.4-6, 800.8, and 800.9. Additional guidance published by the Advisory Council includes *Section 106, Step by Step* and *Preparing Agreement Documents*. Both of these discuss information and documentation needs involved in Section 106. The following discussion is not a substitute for those documents, but a brief set of reminders.

This form may be used for actions that are undertakings as defined for purposes of Section 106. It is a model that may be altered to suit the needs of a particular park and its advisers. It may or may not be the most effective format for documenting Section 106 compliance, depending on the complexity and planning needs or history of the undertaking. It can be a starting point for the review process within NPS, and it may be used to document programmatic exclusions under the 1995 Servicewide Programmatic Agreement (stipulation IV). For some cases, a memorandum, more detailed report, or NEPA document that includes information meeting documentation requirements in 36 CFR Part 800 may be necessary or preferable.

The form is designed to follow, in a condensed way, the basic questions that should be asked and answered in meeting responsibilities under 36 CFR Part 800. The basic questions are:

A. What is the project and how did the park identify it as an undertaking subject to Section 106?

(As defined in 36 CFR 800.2[o], an undertaking means a project, activity, or program that can result in changes in the character or use of properties listed or eligible for listing in the National Register of Historic Places. If in doubt about whether a project is an undertaking subject to Section 106 review, the park's Section 106 coordinator should consult the state historic preservation officer (SHPO) or others in the park's group of CRM advisers on Section 106.)

B. Does the park know whether the project's "area of potential effects" includes properties in or eligible for the National Register of Historic Places?

(Did the park define the area of potential effects in a comprehensive way? What historic properties will be affected by this undertaking? How did NPS identify those properties; did NPS make a reasonable and good-faith effort to ensure that no places that might be eligible for the National Register have been overlooked? Did NPS have enough information to evaluate the Register eligibility of properties in the area? Documentation may include descriptions of those properties and of efforts to identify them, such as National Register forms and reports or narratives summarizing the resources and survey efforts.)

C. How will the project affect any such eligible historic properties?

(How did the park and its advisers apply the criteria of effect and adverse effect in 36 CFR 800.9? How did the park get the advice of the SHPO, and of other interested persons, on this point?)

D. Did the park provide opportunities for comment by local governments, Indian tribes, other interested persons and the public that were appropriate to the scale and type of the undertaking and the known or expected public interests?

E. If the undertaking would have adverse effects, how did the park and its advisers consider alternatives that would avoid or mitigate the potential for adverse effects?

Generally, Section 106 consultation results in an agreement document of the types described in the Council's *Preparing Agreement Documents*. That booklet provides suggestions for writing agreement documents and sample formats, as well as some standard language for conditions and stipulations.

Decisions about which CRM disciplines and technical skills are relevant to the project at hand are important. This form should reflect information showing how the park made decisions about which CRM specialists should participate in and advise on individual projects. It should be used to indicate how CRM specialists have been involved in those decisions. This does not mean, however, that every one of the park's CRM advisers must comment on every undertaking.

ITEM BY ITEM:

No. 2: "Area of potential effects" is defined in 36 CFR 800.2(c) as "the geographic area or areas within which an undertaking may cause changes in the character or use of historic properties, if any such properties exist."

No. 4: In the first blank, please include applicable park facility or site numbers or IDLCS, IDCLI, ARI, & HABS/HAER numbers. For location, please note UTM coordinates, if available, or township, range, and section if applicable and available. If neither of these is readily available, other location description may be used. In the last blank, specify National Register status of affected resource(s), entering the appropriate number from the list below:

(1) listed in Register and documented

(2) listed but not documented

(3) determined eligible by the Keeper of the Register

(4) determined ineligible by the Keeper

(5) found eligible for 106 purposes through consultation with the SHPO

(6) found not eligible for 106 purposes through consultation with the SHPO

(7) a designated National Historic Landmark

(8) within a Register-eligible district–please name district

(0) status unknown by person completing Part A of the form

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX P: 1995 Servicewide Programmatic Agreement

PROGRAMMATIC AGREEMENT AMONG THE

NATIONAL PARK SERVICE

(U.S. DEPARTMENT OF THE INTERIOR),

THE ADVISORY COUNCIL

ON HISTORIC PRESERVATION,

AND

THE NATIONAL CONFERENCE OF STATE HISTORIC

PRESERVATION OFFICERS

WHEREAS, the National Park Service (NPS) plans for, operates, manages, and administers the National Park System, and is responsible for preserving, maintaining, and interpreting the cultural resources of the System unimpaired for the enjoyment of future generations; and

WHEREAS, the operation, management, and administration of the System entail undertakings that may affect historic properties (as defined in 36 CFR Part 800), which are therefore subject to review under Sections 106, 110(f) and 111(a) of the National Historic Preservation Act as amended (NHPA; 16 USC 470 *et seq*.) and the regulations of the Advisory Council on Historic Preservation (Council) (36 CFR Part 800); and

WHEREAS, the NPS has established management policies, guidelines, standards, and technical information designed for the treatment of cultural resources consistent with the spirit and intent of the NHPA; and

WHEREAS, the NPS has a qualified staff of cultural resources specialists in parks, System Support Offices, and archeological and preservation centers to carry out programs for cultural resources; and

WHEREAS, the NPS has consulted with the National Conference of State Historic Preservation Officers (Conference) and the Council regarding ways to ensure that NPS operation, management, and administration of the System provide for management of the System's cultural resources in accordance with the intent of NPS policies and with Sections 106, 110, and 111 of the NHPA; and

WHEREAS, the National Park Service, the Conference, and the Council executed a Nationwide Programmatic Agreement in 1990 that is superseded with the execution of this Programmatic Agreement; and

WHEREAS, the NPS has re-structured in order to place more resources and delegations of authorities with park managers;

NOW, THEREFORE, the NPS, Conference, and Council mutually agree that the NPS will carry out its Section 106 responsibilities with respect to management of the System in accordance with the following stipulations:

STIPULATIONS

I. POLICY

The NPS will continue to preserve and foster appreciation of the cultural resources in its custody through appropriate programs of protection, research, treatment, and interpretation. These efforts are and will remain in keeping with the NHPA, the National Environmental Policy Act (NEPA), the American Indian Religious Freedom Act, the Archaeological Resources Protection Act, the Archeological and Historic Preservation Act of 1974, the Native American Graves Protection and Repatriation Act, the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation, NPS Management Policies, and the Guidelines for Federal Agency Responsibilities Under Section 110 of the National Historic Preservation Act. It remains the NPS goal to implement these programs in consultation with other Federal agencies, State Historic Preservation Officers (SHPOs), Indian tribes, local governments, and the public.

Other guidelines, standards, and regulations relevant to this Agreement and its purposes include:

NPS-28, Cultural Resource Management Guideline

NPS-2, Planning Process Guideline

NPS-6, Interpretation and Visitor Services Guideline

NPS-12, NEPA Compliance Guideline

NPS-38, Historic Property Leasing Guideline

36 CFR Part 18, Leases and Exchanges of Historic Property

II. IDENTIFYING CULTURAL RESOURCES

The NPS will coordinate with SHPOs activities for research related to resource management needs and identification, evaluation, and registration of park historic properties. NPS fulfills these responsibilities under Section 110 of the NHPA and 36 CFR Part 800.4, with regard to properties potentially significant at national, State, or local levels and mindful of State preservation planning and inventory programs.

III. DELEGATION OF AUTHORITY

A. Park superintendents are the responsible agency officials as defined in 36 CFR Part 800.1(c)(1)(i) for purposes of Section 106 compliance. They will assume this responsibility in accordance with Stipulation VIII below.

B. Superintendents will be held accountable for their performance in Section 106 compliance through NPS procedures for performance and program evaluation.

C. To meet this responsibility, each park will have the following:

1. a commitment to training park staff, including an invitation to the appropriate SHPO and the Council to participate in that training, so that park staff are generally familiar with Section 106 processes; and

2. at least one staff person qualified to act as the park's 106 coordinator, whose 106 responsibilities are specified in his or her position description and performance standards; and

3. a formally designated set of CRM advisers whose qualifications are consistent with OPM standards, the intent of 36 CFR Part 61, Appendix A, and the intent of Section 112(a)(1)(B) of the National Historic Preservation Act. In-park staff, System Support Offices, other parks, NPS cultural preservation and archeological centers, Denver Service Center, other government agencies, and specialists and scholars outside NPS are all possible sources for needed expertise. Specialists who are not federal employees must meet the standards in 36 CFR Part 61, Appendix A.

D. SHPOs and the Advisory Council may at any time raise with the appropriate Field [Regional] Director any programmatic or project matters where they wish the Field Director to review a park superintendent's decision.

IV. PROJECT REVIEW–NATIONWIDE PROGRAMMATIC EXCLUSIONS

A. Undertakings listed in IV.B will be reviewed for Section 106 purposes within the NPS, without further review by the Council or SHPOs, provided:

1. that these undertakings are based upon information adequate to identify and evaluate affected cultural resources [except for IV.B.(5)];

2. that the NPS finds that their effects on cultural resources in or eligible for the National Register will not be adverse based on criteria in 36 CFR Part 800.9; and

3. that decisions regarding these undertakings are made and carried out in conformity with applicable policies, guidelines, and standards as identified in Stipulation I, and are documented by NPS using the form for "Assessment of Actions Having an Effect on Cultural Resources" or another appropriate format. (See Stipulation VII below.)

B. The following undertakings may be reviewed under the terms of IV.A:

1. preservation maintenance (housekeeping, routine and cyclic maintenance, and stabilization) as defined in NPS-28;

2. routine grounds maintenance, such as grass cutting and tree trimming;

3. installation of environmental monitoring units, such as those for water and air quality;

4. archeological monitoring and testing and investigations of historic structures and cultural landscapes involving ground disturbing activities or intrusion into historic fabric for research or inventory purposes (see also Stipulations II and IX.C);

5. acquisition of lands for park purposes, including additions to existing parks;

6. rehabilitation and widening of existing trails, walks, paths, and sidewalks within previously disturbed areas;*

7. repaving of existing roads or existing parking areas within previously disturbed areas;*

8. placement, maintenance, or replacement of utility lines, transmission lines, and fences within previously disturbed areas;*

9. rehabilitation work limited to actions for retaining and preserving, protecting and maintaining, and repairing and replacing in kind materials and features, consistent with the Secretary of the Interior's Standards for Rehabilitation and the accompanying guidelines;

10. health and safety activities such as radon mitigation, and removal of asbestos, lead paint, and buried oil tanks;

11. installation of fire detection and suppression systems, and security alarm systems, and upgrading of HVAC systems;

12. erection of signs, wayside exhibits, and memorial plaques;

13. leasing of historic properties consistent with NPS-38, if proposed treatments are limited to those consistent with IV.B(1) and (9) and other activities excluded under IV.A and B.

C. Park superintendents and SHPOs may develop additions to Stipulation IV.B that identify other types of undertakings that they mutually agree will be excluded from further review. Proposals for such additions will be provided for review to the Executive Director of the Council, the NPS Director, and the Executive Director of the Conference. Upon their acceptance, the Council, the Conference, and NPS will maintain records on those additions as amendments to this Agreement, and provide for dissemination to other appropriate SHPOs and NPS offices.

D. In the event that a SHPO questions whether a project should be considered a programmatic exclusion under Stipulation IV.A and B, the superintendent and SHPO will make every effort to resolve the issue informally. If those efforts fail, the question will be referred to the Field [Regional] Director. If the matter is still not resolved, it will be referred to the Advisory Council in accordance with Stipulation XI.A.

V. PROJECT AND PROGRAM REVIEW–OTHER UNDERTAKINGS

A. All undertakings (as defined in 36 CFR Part 800), with the exception of those that meet provisions in Stipulation IV, will be reviewed in accord with 36 CFR Part 800.

B. Superintendents are encouraged to evaluate their park's programs and discuss with SHPOs ways to develop programmatic agreements for park undertakings that would otherwise require numerous individual requests for comments.

C. Memoranda of Agreement and Programmatic Agreements specific to a project, plan, or park may be negotiated between park superintendents and SHPOs, pursuant to 36 CFR Part 800.5(e) or 800.13, and may be independent of or supplement this Agreement.

VI. RELATIONSHIP OF PROJECT REVIEW TO PLANS

A. To the extent that the requirements of Section 106 and NEPA overlap for a given plan or project, superintendents are encouraged to coordinate these two processes, including the preparation of documentation and public involvement processes, in accordance with the guidance in 36 CFR Part 800 or otherwise provided by the Advisory Council.

B. In conformity with 36 CFR Part 800.3(c), park superintendents will ensure that the Section 106 process is initiated early in the planning stages of any given undertaking, when the widest feasible range of alternatives is open for consideration.

C. General Management Plans (GMPs) establish a conceptual framework for subsequent undertakings, and can thus play an important role in this process. GMPs may constitute the basis for consultation under 36 CFR Part 800.4-6 on individual undertakings, if sufficient information exists for resource identification, determination of National Register eligibility, and assessment of the effect of a proposed undertaking on the property in question. In the absence of such information, Section 106 consultation will normally be initiated or completed at subsequent stages in the planning process [such as Development Concept Plans (DCPs) or other subsequent implementing plans, as defined in NPS-2].

D. The park superintendent will notify the appropriate SHPO and the Council when a GMP or DCP is scheduled for preparation, amendment, revision, or updating. The superintendent will request comments regarding preservation concerns relevant to the plan, such as management objectives, identification and evaluation of historic properties, and the potential effects of individual undertakings and alternatives on historic properties.

E. During the planning process, the park superintendent, in consultation with the SHPO, will make a determination about which undertakings are programmatic exclusions under IV.A and B, and for all other undertakings, whether there is sufficient information about resources and potential effects on those resources to seek review and comment under 36 CFR Part 800.4-6 during the plan review process. In cases where consultation is completed on specific undertakings, documentation of this consultation will be included in the GMP or DCP.

F. The approved plan will list all undertakings in the plan that are subject to further consultation, and the stage of planning at which consultation is most likely to be completed.

G. NPS GMPs will include a statement about the status of the park's cultural resources inventory and will indicate needs for additional cultural resource information, plans, or studies required before undertakings can be carried out.

VII. NPS PROCESS FOR DOCUMENTING ACTIONS HAVING AN EFFECT ON CULTURAL RESOURCES

All System-related undertakings that may have an effect on cultural resources will be appropriately documented and carried out in accordance with applicable policies, guidelines, and standards, as identified in Stipulation I. Formats for documentation include those outlined in published Advisory Council guidance (see "Preparing Agreement Documents," for example), the NPS "Assessment of Actions Having an Effect on Cultural Resources" form, programmatic agreements and, where appropriate, NEPA documentation that addresses cultural resources issues with information consistent with requirements of 36 CFR Part 800.

Cultural resources specialists will review all such actions prior to their implementation, and parks will maintain documentation of this review. Documentation of NPS reviews not already provided to SHPOs and the Council will be available for review by the Council and the appropriate SHPO upon request. Individual SHPOs who wish to review this documentation are responsible for specifying scheduling, frequency, and types of undertakings of concern to them.

VIII. PUTTING THIS AGREEMENT INTO EFFECT

The delegation of Section 106 responsibility to park superintendents will take place as of October 1, 1995. As a condition of this delegation, each park will identify

A. the specialists, on or off park staff, who will provide the park with advice and technical services for cultural resource issues related to Section 106 compliance. These specialists must be qualified in their areas of expertise and have a specified term of commitment to advise the park; and

B. a contact person to coordinate the park's Section 106 compliance processes.

Parks supplement on-staff expertise through advice and technical services from CRM specialists in SSOs, the Denver Service Center, preservation centers, and other specified CRM specialists inside and outside the NPS, for advice and technical services involved in 106 documentation and consultation. The superintendent will be the responsible agency official for 106 purposes, who ensures the implementation of this agreement and 36 CFR Part 800 procedures, and who signs correspondence to SHPOs and the Advisory Council and documentation of programmatic exclusions.

IX. COOPERATION AND COMMUNICATIONS

A. Within six months of the date of the signature of this PA by all parties, and every two years thereafter, each park superintendent will invite the appropriate SHPO(s) to meet to discuss the compliance process and any actions necessary to improve communications between the park and SHPO.

B. SHPOs, the Conference, and the Council will be informed and consulted about revisions to NPS standards and guidelines listed in Stipulation I.

C. SHPOs, parks and NPS System Support Offices will share information about inventories of historic properties, preservation planning processes, and historic contexts developed by each, as well as other reports and research results related to cultural resources.

D. SHPOs will treat the appropriate park superintendent as an interested party for purposes of State environmental and preservation laws as they may relate to park undertakings and cultural resources.

E. The Council and SHPOs will treat the appropriate park superintendent as an interested party under 36 CFR Part 800 for purposes of undertakings by other Federal agencies and Indian tribes that may affect NPS areas, including undertakings in areas in and around parks.

F. As required in NPS-2, NPS-12, the Section 110 Guidelines, and 36 CFR Part 800, NPS will provide opportunities for Indian tribes and other interested persons to participate in the processes outlined in this Agreement.

X. RELATIONSHIP TO OTHER EXISTING AGREEMENTS

A. This Programmatic Agreement will become effective on October 1, 1995, and shall supersede the following existing Programmatic Agreements:

1. the Memorandum of Understanding executed in June 1976, regarding NPS planning documents;

2. the Programmatic Memorandum of Agreement executed on December 19, 1979, and its amendments dated September 1981 and December 1985 regarding planning documents, energy management, and preservation maintenance; and

3. the Programmatic Memorandum of Agreement executed on December 19, 1982, regarding leasing of historic properties.

4. the nationwide Programmatic Agreement of 1990.

B. Signature and implementation of this Agreement does not invalidate park-, Region- or project-specific Memoranda of Agreement or programmatic agreements negotiated for Section 106 purposes prior to the effective date of this Agreement.

XI. DISPUTE RESOLUTION

A. Should a SHPO or the Council object to a park superintendent's decisions or actions pursuant to any portion of this Agreement, the superintendent will consult the objecting party to resolve the objection. If the park superintendent or the objecting party determines that the objection cannot be resolved, the superintendent will forward all documentation relevant to the dispute to the Field [Regional] Director for further consultation. If the objection still cannot be resolved, the Field Director will forward to the Council relevant documentation not previously furnished to the Council. Within 30 days after receipt of all pertinent documentation, the Council will either:

1. provide the Field Director with recommendations, which the Field Director will take into account in reaching a final decision regarding the dispute; or

2. notify the Field Director that it will comment pursuant to 36 CFR Part 800.6(b), and proceed to comment. Any Council comment provided in response to such a request will be taken into account by the Field Director with reference to the subject of the dispute.**

Any recommendation or comment provided by the Council will be understood to pertain only to the subject of the dispute. The NPS responsibility to carry out all actions under this Agreement that are not the subjects of the dispute will remain unchanged.

B. When requested by any person, the Council will consider NPS findings under this Agreement pursuant to the provisions of 36 CFR Part 800.6(e) on public requests to the Council.

XII. MONITORING, TERMINATION, AND EXPIRATION

A. The National Park Service will convene a meeting of the parties to this Agreement on or about November 15, 1996, to review implementation of the terms of this Agreement and determine whether revisions or amendments are needed. If revisions or amendments are needed, the parties will consult in accordance with 36 CFR Part 800.13.

B. Any party to this Agreement may terminate it by providing ninety (90) days notice to the other parties, provided that the parties will consult during the period prior to termination to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the NPS will comply with 36 CFR Part 800 with regard to individual undertakings otherwise covered by this Agreement.

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: s/Cathryn B. Slater DATE: July 17, 1995

Chairman

NATIONAL PARK SERVICE

By: s/Roger G. Kennedy DATE: July 17, 1995

Director

NATIONAL CONFERENCE OF STATE HISTORIC PRESERVATION OFFICERS

By: s/W. Ray Luce DATE: July 17, 1995

President

Below are two explanatory notes that are not part of the PA text:

* IV.B(6),(7),(8)–The historic qualities of walks, trails, paths, and their surroundings should be carefully evaluated in assessing the potential for adverse effects. Not only potential archeological resources, but also the other kinds of values that might be affected must be considered. Is a particular path's surface finish, for example, a character-defining element in a cultural landscape? Will enlarging a parking lot have a visual impact on a National Register- eligible structure, site, or landscape? Would the new fence alter visual or design qualities of a historic landscape? Will the project affect ethnographic resources?

** XI.A(1) and (2)–This language about the role of the Field (Regional) Director does not alter the ultimate responsibility assigned to heads of agencies under Section 110(l) of the National Historic Preservation Act in cases where there is an adverse effect that is not covered by an agreement with the Council.

IMPLEMENTING SECTION 106

AND THE

1995 SERVICEWIDE PROGRAMMATIC AGREEMENT

WITHIN THE NATIONAL PARK SYSTEM

Purpose

The purpose of this document is to outline the legal and regulatory responsibilities of park superintendents under Section 106 of the National Historic Preservation Act of 1966, and to provide guidance on successful approaches to achieving compliance and avoiding conflict.

Background

Every project that has the potential to affect cultural resources requires compliance with Section 106 and its implementing regulations, 36 CFR Part 800. To facilitate the compliance process by accelerated review of certain specified common activities (programmatic exclusions), the National Park Service negotiated a Programmatic Agreement (PA) with the National Conference of State Historic Preservation Officers (NCSHPO) and the Advisory Council on Historic Preservation (ACHP).

Under the terms of this 1995 PA, the National Park Service:

- continues to preserve and foster appreciation of park cultural resources in accordance with law, regulations, policies, and the Secretary's Standards; and
- carries out the process in 36 CFR Part 800 and documents programmatic exclusions under stipulation IV, ensuring review by cultural resource specialists of all actions subject to Section 106; and
- makes park superintendents the responsible agency officials for 106 purposes, reflecting the new NPS organizational structure and emphasis on de-centralization and teamwork.

The National Conference and the Advisory Council:

- consult with the NPS in the 36 CFR Part 800 process; and
- consider invitations to participate in training for park staffs; and
- respond as they see fit to requests for early participation in park planning; and
- treat park superintendents as interested parties for actions that may affect parks as noted in stipulation IX.

I. Role and Function of Park Managers and Staff

A. As the responsible agency official for actions in the park, the **park superintendent** ensures that legal and regulatory requirements of Section 106 and 36 CFR Part 800 are met, including:

- identification of actions that have the potential to affect cultural resources;
- identification and evaluation of cultural resources that exist in a project area;
- evaluation of the potential effects proposed activities may have on resources that meet National Register criteria;
- consideration of ways to reduce or avoid harm by federal undertakings to potentially affected resources eligible for the Register; and
- involvement of and consultation with the public, state historic preservation officers, and the Advisory Council in this process.[1]

B. Under the 1995 PA, the **park superintendent:**

- is the signatory for correspondence and documentation provided to the SHPO and Advisory Council under 36 CFR Part 800, and for documentation of programmatic exclusions in the 1995 PA;
- designates a park Section 106 coordinator qualified to act as the park's staff contact for the 106 process;
- identifies and uses a set of cultural resource management (CRM) specialists to advise the park in 106 matters.[2] Those specialists' qualifications are consistent with (a) OPM standards, (b) the intent of 36 CFR Part 61, Appendix A, and (c) the intent of Section 112(a)(1)(B) of the National Historic Preservation Act;
- should inform the appropriate SHPO(s) and regional director about the specialists who will be among the park's advisers;
- invites the SHPO to meet to discuss the park's compliance efforts every two years;
- may develop procedures and programmatic approaches to Section 106 that more closely reflect the specific resources and needs of their parks and their working relationships with SHPOs and the Advisory Council;
- should seek to coordinate Section 106 compliance procedures with existing park project review processes; and
- has a commitment to make park staff generally familiar with the 106 process.

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[1] 36 CFR Part 800 contains the definitive description of the process, and "Section 106, Step by Step" and other Advisory Council publications provide further guidance in implementing and interpreting the regulations.

[2] In many cases a support office will be able to provide expertise not currently available on the park staff. An adjacent park or parks may also have individuals with the necessary qualifications, and expertise outside NPS may be sought. Typically, a park's core group of advisers would include a historical architect, archeologist, historical landscape architect, historian, ethnographer, and curator. Superintendents may also sometimes need to reach beyond the core group for additional specialized expertise. Advisers not on the park staff should have a specified term of commitment to advise the park.

C. The **park Section 106 coordinator** coordinates and facilitates 106 procedures and works with project initiators, planners, and the park's CRM advisers to:

- initiate or coordinate (and review if he/she is a cultural resource management specialist) 106 documentation; and
- seek advice and technical expertise of appropriate CRM advisers/specialists needed in formulating proposals, evaluating properties for National Register eligibility, assessing effects under 36 CFR Part 800, and consulting on adverse effects and mitigation measures.

He or she, optimally, should be a cultural resource management specialist.

II. Section 106 Procedures

As noted in the 1995 PA, the basic process outlined in 36 CFR Part 800 applies to park undertakings, with the exception of those covered as programmatic exclusions by the PA's stipulation IV or otherwise covered by other programmatic 106 documents. Please see "Section 106, Step by Step" and other Advisory Council published guidance for a comprehensive discussion of how to implement the regulatory process. Following are considerations in that process:

A. *Project Identification*. The park Section 106 coordinator should be consulted by others on the park staff to determine the potential of proposed projects to affect cultural resources.

B. *Determination of Undertaking*. The park Section 106 coordinator should determine, in consultation with the park's identified CRM advisers and the SHPO as needed, whether a project is to be considered an undertaking as defined in 36 CFR 800.2(o).

C. *106 Documentation*. The Section 106 coordinator should ensure that appropriate documentation is prepared in a timely manner, reviewed by relevant CRM specialists, signed by the superintendent, and submitted to the SHPO and Advisory Council on Historic Preservation as required in 36 CFR Part 800. (The National Park Service has traditionally used the Assessment of Effect Form to document the consideration of Section 106 in its activities. A model Assessment of Effect Form is in Appendix O. It can be amended to reflect regional protocols or park or area-specific programmatic agreements with an SHPO and the ACHP.)

D. *Consultation*. The Section 106 coordinator should facilitate, monitor, and document the progress of consultation with the public, state historic preservation officers, and the Advisory Council, as appropriate.

E. *Monitoring*. Park staff should provide the Section 106 coordinator with information needed to monitor and ensure the implementation of any conditions or stipulations developed in agreement documents through the Section 106 process. This includes notifying the 106 coordinator if cultural resources are discovered, or if the scope of work is changed, in the course of an undertaking's implementation.

F. *Archiving of Documentation*. The park Section 106 coordinator should maintain in the park files (file code H4217) all "Assessment of Effect" forms and other 106 documentation, including correspondence, plans, photographs, etc.

III. Communications and Accountability

A. Superintendents' current performance contracts include a section on the park's resources management. Superintendents are responsible within this performance evaluation system for the park's Section 106 compliance activities.

B. Revised NPS procedures for program evaluation will also provide ways to assess the Service's observance of Section 106 compliance procedures.

C. Annual summaries of park compliance activity should be provided to the regional director (and to the Service's federal preservation officer) and may be incorporated into the superintendents' annual reports. (These aggregated summaries allow the regional director and the federal preservation officer to observe broad trends in Section 106 activities and knowledgeably represent the Service at meetings of NPS, NCSHPO, and Advisory Council staff.)

D. Each SHPO will be invited to comment to the superintendent and to the regional director on each park's performance in meeting the responsibility for Section 106 compliance.

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX Q: Preparing National Register Forms

Sections 110 and 106 of the National Historic Preservation Act require all federal agencies to maintain programs to identify, evaluate, and nominate to the National Register of Historic Places historic properties they own or control and to consider the effects of their actions on such properties.

Maintained by the National Park Service, the National Register of Historic Places is the nation's inventory of historic districts, sites, buildings, structures, and objects significant in American history, architecture, archeology, engineering, and culture. Because its scope is nationwide, the National Register is a tool for connecting and relating park cultural resources to other resources in broad and local contexts. Linking historic properties inside and outside park boundaries is one way the NPS establishes partnerships to help protect and educate the public about heritage resources.

Listing a property in the National Register serves several purposes. It identifies and locates the property for planning, management, interpretive, educational, or research purposes. It clearly evaluates how the property meets one or more of the National Register criteria. It defines the property's historical associations, context, and integrity, and it identifies the features and qualities of the property that reflect its significance. Several automated NPS databases, such as the List of Classified Structures, the Cultural Landscapes Inventory, and the archeological sites management information database, include information about National Register eligibility and need to incorporate the results of evaluation using Register criteria to be up-to-date. (A linkage between the CLI and the National Register form is being established as part of the CLI software.)

National Register documentation assists in preserving historic properties by identifying the values and characteristics that make them significant and warrant preservation and protection in the planning of federal undertakings. Federal agencies have a positive responsibility to ascertain whether properties are eligible for the Register, and the Advisory Council on Historic Preservation must be allowed to review and comment on federally conducted, licensed, or assisted undertakings that could affect listed or eligible properties. Properties may qualify for the National Register even if they do not relate to park-specific legislation or interpretive themes.

Park properties may also receive greater public appreciation and understanding through inclusion in publications and electronic sources of information on National Register properties. Once a property has been listed in the National Register, documentation in the form of written records, photographs, maps, and a computerized data base called the National Register Information System (NRIS) becomes part of a national repository of information about significant historic properties in the United States. This is available for use by government agencies, researchers, and the interested public. Information on National Register listings appears in a variety of places, including books, articles, tourism promotional literature, and teachers' lesson plans through the "Teaching With Historic Places" program.

To assist agencies in meeting the legal requirements of Sections 106, 110, and 304 of the National Historic Preservation Act, the NPS has developed the following National Register bulletins to guide the preparation of National Register registration forms: *Bulletin 15: How to Apply the National Register Criteria for Evaluation*, *Bulletin 16A: How to Complete the National Register Registration Form*, and *Bulletin 16B: How to Complete the National Register Multiple Property Documentation Form*. These are the basic guides for documenting a property to National Register standards. The forms can be prepared on a computer using the National Register nomination form templates (available in several formats at no

cost from the National Register of Historic Places [2280], National Park Service, 1849 C Street NW, Washington, DC 20240).

Other bulletins, such as *Bulletin 7: Definition of Boundaries for Historic Units of the National Park System*, *Bulletin 12: Definition of National Register Boundaries for Archeological Properties*, *Bulletin 30: Guidelines for Evaluating and Documenting Rural Historic Landscapes*, *Bulletin 36: Guidelines for Evaluating and Registering Historical Archeological Sites and Districts*, and *Bulletin 39: Researching a Historic Property*, may also be useful in preparing registration forms. There are also bulletins on select topics, such as historic battlefields, traditional cultural properties, and less-than-50-year-old properties. A complete list of National Register bulletins and copies of these publications are available from the National Register of Historic Places (address above). Many of the bulletins are available on the World Wide Web and may be downloaded; access is easy through the National Register homepage at http://www.cr.nps.gov/nr/nrhome.html.

The procedures to be followed in nominating properties to (or removing them from) the National Register are in 36 CFR Part 60; the procedures for seeking determinations of eligibility are in 36 CFR Part 63. Using these instructions and the following supplemental material, cultural resource specialists, trained to evaluate and describe the significant qualities of nominated resources, usually prepare the National Register forms.

Historical units of the national park system are administratively listed in the National Register upon their authorization or establishment, but they require the same level of descriptive and evaluative documentation as other properties being nominated. This documentation defines the values of the parks that are historically significant and worthy of preservation.

How Many Nominations Should a Park Prepare?

Historical parks, which under 36 CFR Part 60 are automatically listed in the National Register, may contain a wide range of cultural resources reflecting different periods of history (or prehistory), different areas of significance, and different levels of significance (local, state, or national). Some of their resources may not represent the aspect(s) of history noted in their authorizing legislation. Nevertheless, all of such a park's historic properties should be documented in a single National Register form (as opposed to preparing separate forms for properties representing different aspects of the park's history). An all-inclusive National Register form will be more efficient to prepare, will promote an integrated approach to evaluating the park's cultural resources, and will simplify locating information on these parks in the National Register files.

For national park system units not established specifically for their historical significance, it is equally important to identify and evaluate cultural resources and nominate them to the National Register. These parks often contain a variety of resources, sometimes widely separated, that are eligible for the Register individually or collectively. In these parks, decisions about how many nomination forms to prepare should reflect the National Register guidance on defining resource boundaries (see *National Register Bulletin 16A*, pp. 56—57) and treat resources in an integrated, interdisciplinary way. The National Register staff can advise on the suitability of various formats for specific resources.

Nomination Formats

The National Historic Preservation Act recognizes five types of cultural resources eligible for listing in the National Register, and nominations should be submitted in one of these categories: district, site, building, structure, or object (see *National Register Bulletins 15* and *16* for definitions and guidance on selecting categories).

Each listing in the National Register fits one of the five categories of resource types listed above. Properties may be (1) nominated and listed individually using the National Register of Historic Places Registration Form (NPS-10-900) or (2) nominated and listed collectively in a multiple property format using the National Register of Historic Places Multiple Property Documentation Form (NPS-10-900-b) if all included properties are historically, culturally, or geographically related. Each district, site, building, structure, or object in a multiple property submission must meet the National Register criteria.

The Multiple Property Documentation Form is a cover or overview document and not a nomination in its own right; it serves as a basis for evaluating the National Register eligibility of related properties. In it the themes, trends, and patterns of history shared by the properties are organized into **historic contexts** and **property types** representing these contexts. It may be used to nominate a large number of related historic properties simultaneously, or to establish the **registration requirements** for properties not yet identified or documented but expected to be nominated in the future. Registration requirements describe the physical characteristics, associative qualities, or information potential that an example of the property type must possess to qualify for the National Register. The nomination of each building, site, district, structure, or object is made on the National Register Registration form. The name of the thematic group, denoting the historical framework of nominated properties, is the **multiple property listing**. The Multiple Property Documentation Form together with the individual Registration forms compose a **multiple property submission**. See *National Register Bulletin 16* for an extended discussion of nomination formats.

In some cases, a Multiple Property Documentation Form may be prepared specifically to establish the context and registration requirements for nominating cultural resources on a nationwide basis. One example is the form for "Historic Park Landscapes in National and State Parks." Copies of this form are available from the National Register and have been sent to NPS support offices. Multiple Property Documentation Forms prepared by states and other federal agencies may also establish contexts for evaluating NPS resources. Further information about Multiple Property Documentation Forms accepted by the National Register, including copies of those forms, is available from the National Register. State historic preservation officers should also be consulted about the availability of contextual studies that may help in the evaluation of park resources.

Multiple Property Documentation Forms are not used to document historical park units that are registered in their entirety. Because a historical park is a single National Register listing, the National Register Registration Form is used. Most such parks are registered as districts, with listings of contributing and non-contributing resources.

Historic resource studies and other cultural resource reports contain much information required for National Register documentation. Ideally, National Register forms are prepared in conjunction with such research reports, with appropriate text or data simply copied and placed in National Register formats. A study demonstrating how this can be done is *Cultural Resources Management in Mammoth Cave National Park*. Other examples of NPS multiple property submissions are available on request from the National Register. Additional advice for coordinating evaluation and research report processes is in the Departmental Consulting Archeologist's technical brief no. 7, *Federal Archeological Contracting: Utilizing the Competitive Procurement Process*. This bulletin discusses the use of National Register criteria in developing scopes of work for archeological investigations and reports.

How Much Documentation is Enough?

A National Register nomination should clearly describe and state the significance of the nominated property as it relates to the National Register criteria. There is no prescribed length for a nomination, but nominations need not be long, highly technical, or scholarly in format (footnotes are not required, for example, although they may add to the usefulness of a nomination). An explanation of a property's significance can be direct and to the point, as long as it provides a perspective from which to evaluate the property's relative importance.

The nomination form should identify which resources within the nominated area contribute and do not contribute to its significance. As noted in *National Register Bulletin 16A* (p. 17), the documentation should count all sites, buildings, structures, and objects located within the property's boundary that are substantial in size and scale; do not count minor resources unless they contribute strongly to the property's significance.

A **contributing building, site, structure, or object** adds to the historical or traditional cultural associations, historic architectural qualities, or archeological values for which a property is significant because:

- it was present during the period of significance, relates to the documented significance of the property, and possesses historical integrity or is capable of yielding important information about the period; or
- it independently meets the National Register criteria.

A **non-contributing building, site, structure, or object** does not add to the historic architectural qualities, historical or traditional cultural associations, or archeological values for which a property is significant because:

- it was not present during the period of significance or does not relate to the documented significance of the property; or
- due to alterations, disturbances, additions, or other changes, it no longer possesses historical integrity or is incapable of yielding important information about the period; or
- it does not independently meet the National Register criteria.

Defining National Register Boundaries for Historical Units of the National Park System

Historical parks are automatically listed in the National Register on the dates their authorizations are signed into law. Unless and until the NPS has otherwise defined their areas of historical significance, the National Register boundaries are the authorized park boundaries, regardless of land ownership.

For each historical park, the NPS evaluates the entire authorized (listed) area, prepares a nomination form, and precisely defines the National Register boundary to encompass the resources that have historical significance. If the proposed National Register boundary coincides substantially with the park boundary, the documentation is sent to the state historic preservation officer inviting comment. If the park's authorized boundary includes land not owned by the NPS, the non-NPS owners should also be informed of the documentation. Completed documentation is forwarded to the Assistant Director, National Center for Cultural Resources Stewardship and Partnership Programs (who acts on behalf of the NPS federal preservation officer, the Associate Director, Cultural Resource Stewardship and Partnerships), for formal submission to the Keeper of the National Register. When the Keeper signs the nomination form, the National Register boundary is defined by the documentation.

If the proposed National Register boundary differs from the authorized park boundary, the documentation is submitted to the state historic preservation officer for comment within 45 days. If there are any non-NPS owners of land within the park boundary and also within the proposed Register boundary, they should also be notified. In some cases, the area documented and subsequently included in the National Register may be less than the authorized park boundary to exclude, for example, non-historic buffer zones or areas that have lost historical integrity. Such areas should be described and their exclusion justified in the National Register registration form.

In all cases, non-historic buildings or other developments within the National Register boundary, such as modern visitor centers, must be specifically accounted for and identified as non-contributing in the "description" section of the National Register form.

Defining National Register Boundaries Within Non-Historical Units of the National Park System

Many parks added to the system primarily for their natural or recreational values contain important cultural resources that qualify for listing in the National Register. These resources (either districts, sites, buildings, structures, or objects) should be nominated to the National Register with defined boundaries that encompass, but do not exceed, their full extent. The registered area should be large enough to include all historic features but should not include buffer zones or acreage not directly contributing to its historical

significance. Refer to *National Register Bulletin 16A*, pp. 56—57, for guidance in selecting boundaries for different property types.

The NPS and other federal agencies may nominate properties where a portion of the property is not under federal ownership or control but is an integral part of the cultural resource. Such submissions should be handled under procedures for concurrent nominations as outlined in 36 CFR 60.10, "Concurrent State and Federal nominations."

Objects, Collections, and the National Register Form

The National Historic Preservation Act specifies historic objects, along with buildings, districts, sites, and structures, as cultural resources to be included in the National Register. Because the National Register criteria require integrity of location and setting, and because of the practical difficulties of encompassing the volume of potentially eligible objects and collections, the National Register limits individual listing of objects to relatively large, fixed features that remain in their historic settings (as opposed to museum contexts).

Frequently, however, objects and collections (including artifacts, furnishings, and historic documents) are associated with and contribute to the significance of sites, buildings, structures, or districts qualifying for National Register listing. For example, the furnishings at Sagamore Hill National Historic Site, the artifacts and samples excavated at Mesa Verde National Park, the historic documents at Edison National Historic Site, and the architectural fabric removed from Independence Hall at Independence National Historical Park are all significant, contributing features.

Such place-related and Service-controlled historic object collections should be described and evaluated in the National Register forms documenting the contributing features of their associated properties. The characteristics of such collections should be broadly described (scope, types, range, variation, quality) in a summary manner. In a nomination for a historic house, include a statement about the scope and characteristics of the furnishing collection historically associated with the house. Service-controlled archeological collections associated with buildings, sites, districts, or structures should be similarly described. Site-related historic documentary resources also should be included. The form should describe only those items original to or historically associated with the nominated property; other objects, whether period pieces or modern reproductions, acquired for interpretive or comparative study purposes should not be included in the nomination form.

Descriptions of collections should not list the number of items in the collection or the number of collections, nor should they include accession information, append inventories, or state their location. Collections outside Service control should not be listed. "Service control" applies to collections possessed by the NPS or on documented loan to an institution or agency and subject to recall at the discretion of the Service. The significance statement of the National Register form must assess the collections' value in relation to the property in terms of the National Register criteria.

Collections resulting from archeological studies usually derive their significance as major scientific collections. Within this concept the original field notes, negatives, slides, field catalogs, field diaries, and archived remote sensing data should be listed as contributing. Under the National Register criteria, the sites where these artifacts were found have yielded and/or are likely to yield information important in history or prehistory. No matter how significant a collection is in its own right, its associated site remains the subject of the National Register nomination, with the collection regarded as a feature of the site.

Many completed National Register forms may not reflect the objects and collections historically associated with the properties they describe and evaluate. Park and other cultural resource personnel with National Register documentation responsibilities should review these forms and submit addenda to cover collections when necessary. For places where National Register forms have not yet been submitted, any associated collections should be included in accordance with the above guidelines.

Processing National Register Forms

National Register registration forms are processed as prescribed in 36 CFR Part 60; federal agency nomination procedures are in 36 CFR 60.9. According to 36 CFR 60.9(b), registration forms are prepared under the guidance of the federal preservation officer designated by the head of the federal agency to

fulfill its responsibilities under the National Historic Preservation Act. The Associate Director, Cultural Resource Stewardship and Partnerships, is the National Park Service's FPO. This program responsibility has been delegated to the Assistant Director, National Center for Cultural Resources Stewardship and Partnership Programs.

Under 36 CFR 60.9(c), National Register nominations of federal properties are submitted to the appropriate state historic preservation officers for review and comment, and the chief elected local officials are notified and invited to comment. Following SHPO and local government review, National Register forms documenting properties within national park system units are submitted to the NPS FPO by the park superintendents or other NPS offices as agreed by the superintendents or regional directors.

Parks or other originating offices should ensure that Register nominations are consistent with regulatory procedural requirements, adequately documented, and technically and professionally correct and sufficient. Support office cultural resources program staff should receive a copy of each completed nomination. Cultural resource specialists in parks, support offices, or elsewhere may prepare or advise and provide technical assistance on National Register forms. Depending on the nature of the property being considered, the advice or review of an archeologist, ethnographer, historian, architectural historian, curator, historical architect, and/or cultural landscape architect may be needed to evaluate the nominated property and the sufficiency of the documentation. Preparers and reviewers should be familiar with the National Register regulations, all National Register bulletins, and the record of the park or cluster in evaluating similar properties. Preparers and reviewers should evaluate:

- whether the nominated property meets the National Register criteria for evaluation;
- whether the boundary adequately defines the full extent of the significant resource(s); and
- whether the property is adequately documented to current National Register documentation standards.

The planning and management implications of a National Register submission should not influence either the decision to nominate or the scope of the submission. Reviewers advise the preparer or superintendent whether the property meets the National Register criteria and is adequately documented. Reviewers may recommend that additional work be performed to adequately justify and document the property. If not satisfied with a submission, the superintendent may obtain other professional evaluations.

Completed draft forms may be forwarded for preliminary review to the Keeper of the National Register. This preliminary review is optional. The National Register staff upon request reviews the forms and comments on the adequacy of documentation. If they question the significance of a nominated property or the adequacy of documentation, the issues should be resolved in consultation with the involved park and cultural resource specialists.

Following any preliminary review, the form is returned to the park or other originating office, which sends it to the appropriate SHPO and chief elected local officials for comment in accordance with 36 CFR 60.9(c). The chief elected local officials of the county (or equivalent governmental unit) and municipal jurisdiction in which a property is located must be notified and given 45 days in which to comment. If the SHPO or local officials comment on the documentation, the comments are considered and incorporated into the nomination if appropriate. After receiving the comments of the SHPO and local officials, or if there has been no response within 45 days, the originating office forwards the form (together with any comments received) to the Assistant Director, National Center for Cultural Resources Stewardship and Partnership Programs, who may approve the nomination and transmit it to the Keeper of the National Register.

If the property is administratively listed in the National Register as a historical unit of the national park system, it is still necessary to send the SHPO a copy of the form and invite comments. (See page 313.)

Processing the Form at the National Register

The National Register must act on nominations within 45 days of receipt. The Register staff places notice that the property is being nominated in the *Federal Register* for a 15-day public comment period. The information on the property is entered into the National Register Information System database. Following the comment period the nomination is reviewed; if the property is justified as meeting the National Register criteria and is adequately documented, it is listed in the National Register. Technical corrections

to the form will be made by the National Register staff in consultation with the Assistant Director, National Center for Cultural Resources Stewardship and Partnership Programs, and the form amended by a Supplementary Listing Record prepared by the National Register staff.

Notice of the listing of the property in the National Register is provided to the NPS FPO and to the appropriate support office and park superintendent. If requested, copies of the signed signature page will also be provided by the National Register staff to the park superintendent and support office. At any time the status of a nominated property can be checked by calling the National Register at (202) 343-9536. The National Register Information System, the automated database of National Register listings, is also available for searches, and may be reached through the Register homepage at http://www.cr.nps.gov/nr/nrhome.html.

Nominating Properties Outside the Park Boundary

The NPS encourages federal and state preservation offices to cooperate in locating, inventorying, evaluating, and nominating properties possessing historical, architectural, archeological, or traditional cultural values. National Register regulations (36 CFR 60.10, "Concurrent State and Federal nominations") allow federal agencies to nominate properties not under federal ownership or control when they are integral to the property included in the federal nomination. An example might be "Ranching Properties in the Teton Valley," which would include properties both within and outside Grand Teton National Park. Nominating properties outside NPS boundaries is optional, not mandatory.

Registration forms nominating areas extending beyond park boundaries and in nonfederal ownership will be sent to the appropriate SHPO for processing in accordance with 36 CFR 60.6 and 60.10. Forms nominating areas extending beyond park boundaries and administered by other federal agencies shall be sent to the FPOs of the other agencies administering the properties for review. The FPO of the agency originating the form signs it and sends it to the other agency FPO, who signs a letter indicating approval before the nomination is forwarded to the National Register.

Protection of Sensitive Information

Section 304 of the National Historic Preservation Act as amended in 1992 made changes to the provisions under which sensitive information about historic resources may be withheld from public disclosure. Information about ownership as well as location or character may be withheld if disclosure would cause a significant invasion of privacy, impede the use of a traditional religious site by practitioners, or risk harm to the historic resource. In addition, Section 304 clarifies the Secretary of the Interior's authority, in consultation with other federal agency heads, to determine who shall have access to this information for the purposes of the National Historic Preservation Act, and in consultation with the Advisory Council on Historic Preservation, to make the same determinations when information is developed under Sections 106 or 110(f) of the act and Advisory Council regulations (36 CFR Part 800). The Secretary of the Interior has delegated lead responsibility for implementing Section 304 to the Keeper of the National Register.

These changes should be kept in mind in interpreting and applying *National Register Bulletin 29: Guidelines for Restricting Information About Historic and Prehistoric Resources*, which implements Section 304.

Section 304 reads as follows:

(a) Authority to Withhold From Disclosure.–The head of a Federal agency or other public official receiving grant assistance pursuant to this Act, after consultation with the Secretary, shall withhold from disclosure to the public, information about the location, character, or ownership of a historic resource if the Secretary and the agency determine that disclosure may–

(1) cause a significant invasion of privacy;

(2) risk harm to the historic resource; or

(3) impede the use of a traditional religious site by practitioners.

(b) Access Determination.–When the head of a Federal agency or other public official has determined that information should be withheld from the public pursuant to subsection (a), the Secretary, in consultation with such Federal agency head or official, shall determine who may have access to the information for the purpose of carrying out this Act.

(c) Consultation With Council.–When the information in question has been developed in the course of an agency's compliance with section 106 or 110(f), the Secretary shall consult with the Council in reaching determinations under subsections (a) and (b).

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

APPENDIX R: NAGPRA Compliance

1. INTRODUCTION

On November 16, 1990, President George Bush approved the Native American Graves Protection and Repatriation Act [P.L. 101-601; 25 USC 3001-3013; 104 Stat. 3048-3058] (NAGPRA). Final regulations were published on December 4, 1995 [43 CFR 10]. The regulations address the rights of lineal descendants, Indian tribes, and Native Hawaiian organizations to Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. They require federal agencies and institutions that receive federal funds to provide information about Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony to lineal descendants, Indian tribes, and Native Hawaiian organizations and, upon presentation of a valid request, dispose of or repatriate these objects to them.

The National Park Service–like all federal agencies except the Smithsonian Institution (which is under a separate statute)–is required to comply with the regulations. Park superintendents are responsible for notifying and consulting with lineal descendants, Indian tribes, and Native Hawaiian organizations regarding planned excavations and inadvertent discoveries on NPS lands. Superintendents also were responsible for the completion of summaries of Native American collections in their control that might include unassociated funerary objects, sacred objects, and objects of cultural patrimony and inventories of human remains and associated funerary objects. The summaries and inventories included both objects in park collections and those from NPS lands that are currently held in other repositories. Superintendents are responsible for making decisions about the disposition or repatriation of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony under NPS control. The trafficking provisions of the statute may also require cooperation with officials of the Department of Justice regarding illegal excavations on NPS lands.

NAGPRA compliance is to be achieved by implementation of the applicable regulations [43 CFR 10]. This appendix provides guidelines for NPS park, center, and regional compliance with the statute and regulations. Additional technical assistance is available from support offices, archeological and other cultural resource centers, and the Archeology & Ethnography and Museum Management programs in the National Center for Cultural Resources Stewardship and Partnership Programs.

2. WHAT NATIVE AMERICAN OBJECTS ARE COVERED?

The regulations apply to four types of Native American items: (1) human remains, (2) funerary objects, (3) sacred objects, and (4) objects of cultural patrimony. A particular item may fit more than one category. The term *Native American* means of or relating to a tribe, people, or culture indigenous to the United States, including Alaska and Hawaii [43 CFR 10.2(d)]. The term is used only to refer to human remains, funerary objects, sacred objects, or objects of cultural patrimony. It is not used in the regulations to reference any individual or group with standing to request Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony.

Other terms–including human remains, funerary object, sacred object, and object of cultural patrimony–are used in the statute and regulations in very specific ways that may differ from their common meanings. It is these specific meanings that must be used in applying NAGPRA.

a. Human Remains

Human remains means the physical remains of a body of a person of Native American ancestry [43 CFR 10.2(d)(1)]. The term has been interpreted broadly to include bones, teeth, hair, ashes, or mummified or otherwise preserved soft tissues. The regulations make no distinction between fully-articulated burials and isolated bones and teeth. The term applies equally to recent and ancient Native American human remains. The term does not include remains, or portions of remains, freely given or naturally shed by the individual from whose body they were obtained, such as hair made into ropes or nets. Purposefully disposed human remains should not be considered either freely given or naturally shed. For the purposes of determining cultural affiliation, human remains incorporated into funerary objects, sacred objects, or objects of cultural patrimony are considered part of that object. This provision is intended to prevent the destruction of a funerary object, sacred object, or object of cultural patrimony that is affiliated with one Indian tribe but incorporates human remains affiliated with another Indian tribe. Human remains that have been repatriated under NAGPRA to lineal descendants, Indian tribes, and Native Hawaiian organizations include complete and partial skeletons, isolated bones, teeth, scalps, and ashes.

b. Funerary Objects

Funerary objects are defined as items that, as part of the death rite or ceremony of a culture, are reasonably believed to have been placed intentionally at the time of death or later with or near individual human remains. Funerary objects must be defined by the preponderance of the evidence as having been removed from a specific burial site of an individual affiliated with a particular Indian tribe or Native Hawaiian organization or as being related to specific individuals or families or to known human remains. The term "burial site" means any natural or prepared physical location, whether originally below, on, or above the surface of the earth, into which individual human remains were deposited as part of the death rite or ceremony of a culture. Burial sites include rock cairns or pyres which do not fall within the ordinary definition of grave site [43 CFR 10.2(d)(2)].

Items made exclusively for burial purposes are considered funerary objects even if there are no associated human remains. Items that inadvertently came into contact with human remains are not considered to be funerary objects. Certain Indian tribes, particularly those from the northern plains, have ceremonies in which objects are placed near, but not with, the human remains at the time of death or later. These items should be considered funerary objects. The regulations distinguish between "associated funerary objects"–for which the human remains and funerary objects are in the possession or control of a federal agency or museum–and "unassociated funerary objects," for which the human remains are not in the possession or control of a federal agency or museum.

Associated and unassociated funerary objects that have been repatriated under NAGPRA to lineal descendants, Indian tribes, and Native Hawaiian organizations include many beads of various types; pottery jars, bowls, and sherds; tools and implements of wood, stone, bone, and metal; trade silver and other goods; weapons of many types, including rifles and revolvers; and articles or fragments of clothing.

c. Sacred Objects

Sacred objects are defined as specific ceremonial objects needed by traditional Native American religious leaders for the practice of traditional Native American religions by their present-day adherents. Traditional religious leaders are individuals recognized by members of an Indian tribe or Native Hawaiian organization as being responsible for performing cultural duties relating to the ceremonial or religious traditions of that Indian tribe or Native Hawaiian organization, or exercising a leadership role in an Indian tribe or Native Hawaiian organization based on the tribe's or organization's cultural, ceremonial, or religious practices.

While many items, from ancient pottery sherds to arrowheads, might be imbued with sacredness in the eyes of an individual, this definition is specifically limited to objects that were devoted to a traditional Native American religious ceremony or ritual and that have religious significance or function in the continued observance or renewal of such ceremony [43 CFR 10.2(d)(30)]. Sacred objects that have been repatriated under NAGPRA to lineal descendants, Indian tribes, and Native Hawaiian organizations include medicine bundles, prayer sticks, pipes, effigies and fetishes, basketry, rattles, and a birchbark scroll.

d. Objects of Cultural Patrimony

Objects of cultural patrimony are defined as items having ongoing historical, traditional, or cultural importance central to the Indian tribe or Native Hawaiian organization itself, rather than property owned by an individual tribal member. These objects are of such central importance that they may not be alienated, appropriated, or conveyed by any individual tribal member. Such objects must have been considered inalienable by the affiliated Indian tribe or Native Hawaiian organization at the time the object was separated from the group [43 CFR 10.2(d)(40)]. Objects of cultural patrimony that have been repatriated under NAGPRA to Indian tribes and Native Hawaiian organizations include a wolf-head headdress, a clan hat, several medicine bundles, and ceremonial masks of varying types.

An item may be considered an object of cultural patrimony as well as a sacred object. Items fitting both categories that have been repatriated under NAGPRA to Indian tribes and Native Hawaiian organizations include Zuni War Gods, a Sun Dance wheel, ceremonial masks of several types and functions, and a tortoise shell rattle.

3. WHO HAS STANDING TO MAKE A REQUEST?

The regulations provide certain individuals and organizations the opportunity to request Native American human remains and cultural items. Lineal descendants, Indian tribes, and Native Hawaiian organizations may request Native American human remains, funerary objects, and sacred objects. Indian tribes and Native Hawaiian organizations may request objects of cultural patrimony. The criteria needed to identify who has standing to make a request are outlined below.

a. Lineal Descendants

Lineal descendant is not defined in the statute, which nevertheless makes clear that lineal descendants have priority over Indian tribes or Native Hawaiian organizations in making requests for human remains, funerary objects, and sacred objects. Lineal descendant is defined by regulation as an individual tracing his or her ancestry directly and without interruption by means of the traditional kinship system of the appropriate Indian tribe or Native Hawaiian organization or by the American common law system of descent to a known Native American individual whose remains, funerary objects, or sacred objects are being requested [43 CFR 10.2(b)(1)]. The necessity for a direct and unbroken line of ancestry between the individual making the request and a known individual is a high standard, but one that is consistent with the preference for disposition or repatriation to lineal descendants required by the statute. Reference to traditional kinship systems in the definition is designed to accommodate the different systems that individual Indian tribes and Native Hawaiian organizations use to reckon kinship.

b. Indian Tribes

Indian tribe is defined to mean any tribe, band, nation, or other organized Indian group or community of Indians, including any Alaska Native village as defined in or established by the Alaska Native Claims Settlement Act [43 USC 1601 et seq.], that is recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians [43 CFR 10.2(b)(2)]. This definition was drawn explicitly from the American Indian Self Determination and Education Act [25 USC 450b], a statute implemented since 1976 by the Bureau of Indian Affairs to apply to a specific list of eligible Indian tribes and Alaska Native villages and corporations. The definition within the American Indian Self Determination and Education Act precludes extending applicability of NAGPRA to nonfederally recognized Indian groups. This includes groups that have been terminated, are current applicants for recognition, or have only state or local jurisdiction legal status. There are currently 763 Indian tribes and Alaska Native villages and corporations that are eligible to make requests under the regulations. The current list of Indian tribal contacts is available from the Departmental Consulting Archeologist. Copies of letters or resolutions identifying new Indian tribe NAGPRA representatives should be referred to the Departmental Consulting Archeologist.

c. Native Hawaiian Organizations

Native Hawaiian organization is defined as any organization that (1) serves and represents the interests of Native Hawaiians, (2) has as a primary and stated purpose the provision of services to Native

Hawaiians, and (3) has expertise in Native Hawaiian affairs. The statute specifically identifies the Office of Hawaiian Affairs and Hui Malama I Na Kupuna 'O Hawai'i Nei as being Native Hawaiian organizations [43 CFR 10.2(b)(3)].

Native Hawaiian organizations need not comprise mostly Native Hawaiian members. An earlier version of the NAGPRA bill included a provision requiring Native Hawaiian organizations to have "a membership of which a majority are Native Hawaiian," but Congress chose not to enact it.

d. Nonfederally Recognized Indian Groups

Nonfederally recognized Indian groups *do not* have standing to make direct disposition or repatriation requests under the statute because they are not recognized as eligible for the special programs and services provided by the United States to Indians because of their status as Indians. Human remains in federal agency or museum collections for which a relationship of shared group identity can be shown with a particular nonfederally recognized Indian group are considered "culturally unidentifiable" for NAGPRA purposes. Federal agencies and museums must retain possession of culturally unidentifiable human remains unless legally required to do otherwise or recommended to do otherwise by the Secretary of the Interior.

Federal agencies and museums that hold culturally unidentifiable human remains may request the Native American Graves Protection and Repatriation Review Committee to recommend disposition of such remains to the appropriate nonfederally recognized Indian group. Contact the Departmental Consulting Archeologist for details of this process.

4. WHAT ACTIVITIES ARE REQUIRED?

The activities outlined in the regulations bring together federal agencies and museums that receive federal funds with lineal descendants, Indian tribes, and Native Hawaiian organizations to resolve the complex issues surrounding custody of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. The statute outlines two sets of activities to ensure proper disposition or repatriation of these objects. The first set of activities provides a mechanism for federal land managers to consult with Indian tribes and Native Hawaiian organizations and determine the proper disposition of Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony that are or might be excavated or discovered on federal or tribal lands. The second set of activities provides a mechanism for federal agency or museum officials to consult with and, upon request, repatriate Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony in their collections to lineal descendants or culturally affiliated Indian tribes or Native Hawaiian organizations. The activities for dealing with excavations or discoveries on federal or tribal lands differ from those for dealing with museum and federal agency collections (see chart on following page).

a. Excavations and Discoveries

Provisions that apply to intentional excavations and inadvertent discoveries went into effect on November 16, 1990, when NAGPRA was enacted, and generally apply only to federal and tribal lands. In very limited situations a federal agency may have sufficient legal interest to apply provisions of the statute when it has some other form of property interest, such as a lease or easement. These provisions are designed to facilitate the proper disposition of human remains, funerary objects, sacred objects, or objects of cultural patrimony that might be intentionally excavated or inadvertently discovered on federal or tribal lands.

Intentional excavation means the planned archeological removal of human remains, funerary objects, sacred objects, or objects of cultural patrimony found under or on federal or tribal lands.

Superintendents are required to take reasonable steps to determine whether a planned activity may result in the excavation of human remains, funerary objects, sacred objects, or objects of cultural patrimony. Intentional excavation can only occur if any human remains, funerary objects, sacred objects, or objects of cultural patrimony that might be recovered are excavated in accordance with the requirements of the Archaeological Resources Protection Act (ARPA) and its implementing regulations. This means that scientific methods and techniques must be used for the physical removal and recording. A descriptive and interpretive report of the excavation and curation of the non-NAGPRA items is required.

Intentional excavation of human remains, funerary objects, sacred objects, and objects of cultural patrimony can only proceed after consultation with the appropriate Indian tribes and Native Hawaiian organizations. In the case of tribal lands, intentional excavation of human remains, funerary objects, sacred objects, and objects of cultural patrimony can only proceed with the consent of the appropriate Indian tribe or Native Hawaiian organization. Proof of consultation must be shown the superintendent

ACTIVITIES REQUIRED UNDER

NATIVE AMERICAN GRAVES PROTECTION

AND REPATRIATION ACT

All provisions apply to:

1) lineal descendants, Indian tribes, and Native Hawaiian organizations.

2) Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony.

Specific provisions

for:

Planned excavations and

inadvertent discoveries on

federal or tribal land.

Collections held by federal

agencies or museums that

receive federal funds.

Term used

for transfer:

Disposition

Repatriation

Deadlines:

Effective November 16, 1990

Summaries:

November 16, 1993

Inventories:

November 16, 1995

Priority of control:

1. lineal descendant

2. Indian tribe land owner

3. culturally affiliated Indian tribe

4a. Indian tribe that aboriginally occupied area

4b. Indian tribe with other cultural relationship

5. unclaimed

1. lineal descendant

2. culturally affiliated Indian tribe

3. culturally unidentifiable

Required public notice:

local newspaper(s)

Federal Register

Reference:

25 USC 3002

(Section 3)

43 CFR 10 Subpart B

(§10.3-10.7)

25 USC 3003-3005

(Sections 5-7)

43 CFR 10 Subpart C

(§10.8-10.13)

or other official responsible for the issuance of the required permit. Regulatory requirements for intentional excavations are described at 43 CFR 10.3.

Inadvertent discovery means the unanticipated encounter or detection of human remains, funerary objects, sacred objects, or objects of cultural patrimony found under or on federal or tribal lands. Any person who knows or has reason to know that he or she has inadvertently discovered human remains,

funerary objects, sacred objects, or objects of cultural patrimony on park units after November 16, 1990, must provide immediate telephone notification of the inadvertent discovery, with written confirmation, to the superintendent. Inadvertent discoveries on tribal lands must be reported immediately to the responsible Indian tribe official. If the inadvertent discovery occurred in connection with an ongoing activity, the person must stop the activity in the area of the inadvertent discovery and make a reasonable effort to protect the human remains, funerary objects, sacred objects, or objects of cultural patrimony.

As soon as possible, but not later than three working days after receipt of the written confirmation of notification, the superintendent must notify the appropriate Indian tribes or Native Hawaiian organizations and begin consultation about the disposition of human remains, funerary objects, sacred objects, or objects of cultural patrimony. The activity that resulted in the inadvertent discovery may resume 30 days after the superintendent certifies receipt of the written confirmation of notification.

The activity may also resume in less than 30 days if a written, binding agreement is executed between the NPS and the affiliated Indian tribe or Native Hawaiian organization that adopts a recovery plan for the excavation or removal of the human remains, funerary objects, sacred objects, or objects of cultural patrimony. As with planned excavations, removal and recording must be carried out in a manner consistent with the requirements of ARPA. The disposition of all human remains, funerary objects, sacred objects, and objects of cultural patrimony must be carried out according to the priority listing in the statute. Regulatory requirements for inadvertent discoveries are described at 43 CFR 10.4.

b. Collections

The statute also requires federal agencies and museums to inform Indian tribes and Native Hawaiian organizations of human remains, funerary objects, sacred objects, and objects of cultural patrimony in their collections. Distribution of this information is achieved through two types of documents: summaries and inventories.

Summaries are written descriptions of collections that may contain unassociated funerary objects, sacred objects, or objects of cultural patrimony. NPS summaries were completed by November 16, 1993. They served as a simple notification to each Indian tribe and Native Hawaiian organization of the nature of the collections held by the federal agency or museum. The summary is intended as an initial step to bring Indian tribes and Native Hawaiian organizations into consultation with a federal agency or museum. Consultation between a federal agency or museum and an Indian tribe or Native Hawaiian organization was not required until after completion of the summary. Identification of specific unassociated funerary objects, sacred objects, or objects of cultural patrimony must be done in consultation with Indian tribe representatives and traditional religious leaders who may have special knowledge regarding these categories of objects.

Summary information for all park units was distributed to nearly 800 Indian tribes, Native Hawaiian organizations, and nonfederally recognized Indian groups in November 1993. Regulatory requirements for summaries are described at 43 CFR 10.8. A section has been reserved in the regulations to outline the continuing responsibilities of federal agencies and museums [43 CFR 10.13]. Pending promulgation of that section, superintendents should periodically review their summary submissions to make sure they are accurate and updated to reflect new acquisitions and newly recognized Indian tribes.

Inventories are item-by-item descriptions of human remains and associated funerary objects. Unlike the summaries, inventories must have been completed in consultation with Indian tribes and Native Hawaiian organizations and represent a decision by the superintendent as to the cultural affiliation of particular human remains or associated funerary objects. Inventories must have been completed by November 16, 1995, and provided to the culturally affiliated Indian tribes and Native Hawaiian organizations, as well as to the Departmental Consulting Archeologist, by May 16, 1996. One hundred parks completed inventories, reporting on nearly 5,000 human remains. Inventories of "culturally unidentifiable human remains"–human remains for which no lineal descendant or culturally affiliated Indian tribe or Native Hawaiian organization can be determined–will be provided by the Departmental Consulting Archeologist to the review committee charged with making recommendations regarding the disposition of culturally unidentifiable human remains. Regulatory requirements for inventories are described in 43 CFR 10.9. A section has been reserved in the regulations to outline the continuing responsibilities of federal agencies and museums [43 CFR 10.13]. Pending promulgation of that section, superintendents should periodically

review their inventory submissions to make sure they are accurate and updated to reflect new acquisitions and newly recognized Indian tribes.

5. WHAT IS CONSULTATION?

The regulations require consultation before planned excavations and the completion of inventories and after inadvertent discoveries and the completion of summaries. The term is not defined in statute or regulation.

a. Consultation Defined

The common meaning of the term is *to take advice or recommendations from someone*. In everyday life, an individual may consult with a spouse before making reservations for a family trip, with an accountant before filing an income tax return, or with an attorney before signing a contract.

The individuals we consult with are not randomly or casually selected. We consult with individuals recognized as having special information and expertise relevant to a particular decision. Consultation has as much to do with obtaining information as with providing information. Consultive interactions are always dialogues. Information or opinion obtained through consultation is given special, though not disposive consideration in coming to a final decision. The statute and regulations require consultation to be initiated through a formal written request. However, it is recommended strongly that the formal request be followed by personal contact and interaction, either in person or by telephone.

The statutory consultation requirement is premised upon Congress' explicit recognition of the special information and expertise available from Indian tribes, Native Hawaiian organizations, traditional Native American religious leaders, and lineal descendants. Consultation with these Native American groups and individuals takes the form of a dialogue in which information is shared.

The administrative burden and public nature of federal advisory committees sometimes makes them an inappropriate vehicle for some types of consultation, especially when particularly sensitive issues are being discussed. The Federal Advisory Committee Act places several restrictions on the process used by federal agencies to obtain advice or recommendations on issues or policies from nonfederal groups. Such "advisory committees" must be chartered by the federal agency head and hold open public meetings. Advisory committee members may be reimbursed for their time and expenses while engaged in committee business [5 USC App.].

Provisions of the Federal Advisory Committee Act do not apply to meetings where the attendees' individual advice or recommendations are sought. However, such a group would be covered if the federal agency accepts the group’s deliberations as a source of consensus advice or recommendations [41 CFR 101-6.104].

Meetings held exclusively between federal officials and elected tribal officials (or their designated employees) acting in their official capacities have recently been exempted from these restriction [2 USC 1534(b)]. The Director of the Office of Management and Budget has specified that "the scope of meetings covered by the exemption should be construed broadly to include any meetings called for any purpose relating to intergovernmental responsibilities or administration" [*Federal Register* 60, no. 189 (September 29, 1995)].

b. Notification and Obtaining Consent

Federal consultation can be contrasted with two other forms of communication: notification and consent.

Notification, also conducted with individuals or organizations with special information and expertise relevant to a particular decision, differs from consultation in that it focuses more on providing information than on obtaining information. Notification alerts potentially affected parties of a pending agency action, providing them with an opportunity to respond to the plan. There is generally no formalized follow-up by the federal agency to develop the type of dialogue that is key to the consultation process. In addition, notification often occurs late in the planning process when decisions on how to proceed have already been made by the federal agency. The recent federal court ruling in Pueblo of Sandia v. United States

(see section 6f below) makes it clear that simply sending letters of notification to Indian tribes is not likely to satisfy legal requirements to consult.

Obtaining consent differs from consultation in that the information obtained from the consulting party is decisive. Refusal to consent is sufficient to stop a proposed plan. The process for obtaining consent is usually the same as for consultation.

6. HOW DO YOU CONSULT?

a. Identifying Appropriate Consulting Partners

The first step in any consultation effort must be to *identify the appropriate consulting partners*. This step is particularly critical when an inadvertent discovery occurs on federal land. Upon notification of the discovery, the superintendent has only three working days to contact the appropriate lineal descendants, Indian tribes, or Native Hawaiian organizations [43 CFR 10.4(d)(1)]. It is therefore imperative to have already developed a list of contacts. A current list of the 763 federally recognized Indian tribes–including Alaska Native villages and corporations–and several Native Hawaiian organizations is available from the Departmental Consulting Archeologist.

The implementing regulations [43 CFR 10.5(a), 10.8(d), and 10.9(b)] stipulate that all of the following individuals, Indian tribes, and Native Hawaiian organizations must be consulted:

- Known lineal descendants. These individuals may have already contacted the park or been identified by the appropriate Indian tribe or Native Hawaiian organization. In cases where the identity of the individual whose remains or cultural objects are being discussed is known, it may be appropriate to publish a notice in a newspaper of general circulation in the area in which the affiliated Indian tribes or Native Hawaiian organizations now reside to ensure that all potential lineal descendants have been identified;
- Indian tribes and Native Hawaiian organizations from whose tribal lands the human remains, funerary objects, sacred objects, or objects of cultural patrimony originated. Park units located either totally or in part on tribal lands–such as Canyon de Chelly National Monument, Navajo National Monument, Glen Canyon National Recreation Area, Badlands National Park, and Kalaupapa National Historical Park–should consult with the tribal land owner. The appropriate land-owning Indian tribe or Native Hawaiian organization should also be consulted regarding human remains, funerary objects, sacred objects, or objects of cultural patrimony that were originally collected from tribal land but are currently in NPS collections.
- Indian tribes and Native Hawaiian organizations that are or are likely to be culturally affiliated with the human remains, funerary objects, sacred objects, or objects of cultural patrimony. Cultural affiliation means a relationship of shared group identity that can reasonably be traced historically or prehistorically between members of a present-day Indian tribe or Native Hawaiian organization and an identifiable earlier group. It is essential to consider geographic, kinship, biological, archeological, linguistic, folklore, oral tradition, historic evidence, and other information or expert opinion in identifying Indian tribes and Native Hawaiian organizations that are likely to be culturally affiliated.
- Indian tribes on whose aboriginal lands the human remains, funerary objects, sacred objects, or objects of cultural patrimony were or are expected to be found. The NAGPRA Team, Archeology & Ethnography Program, National Center for Cultural Resources Stewardship and Partnership Programs, has carried out research on legal and judicial decisions related to this topic and can provide additional information if requested. The 1978 final report of the Indian Claims Commission included a map of those lands determined to be the aboriginal territory of particular Indian tribes. A copy of this map is available from the U.S. Geological Survey. Additional determinations of tribal aboriginal lands have been made by Congress and the U.S. Court of Claims (now the U.S. Court of Federal Claims).
- Indian tribes and Native Hawaiian organizations that have a demonstrated cultural relationship with the human remains, funerary objects, sacred objects, or objects of cultural patrimony.

b. Initial Contact and Follow-up

Depending on circumstances, *initial contact* with all the appropriate lineal descendants, Indian tribes, and Native Hawaiian organizations can take several forms. Written correspondence is essential in

documenting the consultation process for the administrative record. However, initiating consultation with a telephone call, with written confirmation, has proved to be an extremely effective way to avoid misunderstandings that could result from exclusive use of written means of communication. Inadvertent discoveries require telephone notification with written confirmation. Fax transmission of written correspondence also expedites the consultation process. No matter what form is used, initial contact should outline the nature of the situation to be discussed, identify who will represent the NPS, request information on the appropriate tribal representatives to contact, and propose a time for additional consultation. The most effective initial contact is short and to the point. In light of the government-to-government relationship between Indian tribes and the United States, initial contact by NPS units should originate with the superintendent and be directed to the tribal chair, governor, or president. Subsequent consultation may be delegated to professional staff if appropriate.

Follow-up is critical to successful consultation. Indian tribe and Native Hawaiian organization officials may be busy and not respond to the initial letter or telephone call in a timely fashion. If a response to the initial communication is not received within two weeks, the superintendent or other appropriate staff should call the appropriate Indian tribe or Native Hawaiian organization official directly to verify that they received the communication.

c. Consultation Meetings

Face-to-face *consultation meetings* provide the most effective forum for obtaining the advice or opinion of Indian tribes and Native Hawaiian organizations. A number of factors need to be considered when planning consultation meetings.

The complexity of issues that need to be dealt with during consultation makes it unlikely that discussions will be completed with a single meeting. Initial meetings generally provide an opportunity for the participants to get acquainted and review legal requirements. Subsequent meetings generally build on this foundation to address the more substantive and often more sensitive issues. Initial meetings can often accommodate larger numbers of people representing various Indian tribes, Native Hawaiian organizations, museums, and other federal agencies. Later meetings focusing on the discussion of particular human remains, funerary objects, sacred objects, or objects of cultural patrimony are sometimes best limited to a small number of representatives of the NPS and a particular Indian tribe or Native Hawaiian organization. Initial meetings should be convened in a location that is mutually convenient to participants. While it is often beneficial to hold subsequent meetings at or near the current location of the site or repository where the objects under discussion were found or are currently held, care should be taken to ensure that the meeting place is culturally appropriate to the Indian tribe representatives. Particular attention should be given to the culturally appropriate care of human remains, funerary objects, sacred objects, and objects of cultural patrimony in NPS possession.

Some Indian tribes and Native Hawaiian organizations have their own meeting protocol that should be taken into account when planning consultation meetings. Tribal representatives may be uncomfortable discussing the repatriation or disposition of human remains, funerary objects, sacred objects, and objects of cultural patrimony without first opening the meeting with prayer. Some topics may require comment from more than one individual. Discussions of other topics may be limited to specific individuals, with others being precluded from even hearing some sensitive information. The individuals representing the Indian tribe or Native Hawaiian organization may change from meeting to meeting. Some information may only be communicated at certain times of the year. Tribal representatives who participate in consultation meetings may have to relate the details of those meetings to their community governing officials, traditional religious leaders, and other community members before decisions are made and actions authorized. Such factors suggest the need to have all participants deliberate on the form and content of consultation meetings, as well as on the time needed for reaching well-informed decisions on these culturally sensitive matters.

d. Proof of Consultation

Proof of consultation before removing or excavating human remains, funerary objects, sacred objects, or objects of culturally patrimony on federal land is required in 43 CFR 10.3(b)(4). The consultation record should document discussions of the human remains, funerary object, sacred object, or object of cultural patrimony under consideration and include copies of all written correspondence between the parties involved, a log of all telephone conversations, and summaries or transcripts of all consultation meetings.

Verbatim transcripts of meetings satisfy the highest standard for proof of consultation, particularly when the transcripts are circulated to all participants for comment before finalization. Protocol for recording consultation meetings, including when the recorder should be turned off, should be negotiated with all parties before the meeting. In situations where the preparation of verbatim transcripts is not possible, consultation meeting notes should be prepared as soon as possible after the meeting and circulated to all participants before finalization. Generally, summaries or transcripts of consultation meetings are not exempt from requests filed under the Freedom of Information Act (see section 8b below).

e. Cost of Consultation

The *cost of consultation* is another issue that must be considered. The NPS is required to consult with the representatives of Indian tribes and Native Hawaiian organizations before reaching decisions regarding the repatriation or disposition of human remains, funerary objects, sacred objects, and objects of cultural patrimony under agency control. These representatives generally do not have the time or money to participate in consultation at agency request. In order to facilitate consultation, it may be appropriate for the NPS to pay the travel and per diem expenses of Indian tribe and Native Hawaiian organization representatives. Consultation fees may also be appropriate for individuals with special expertise–such as traditional religious leaders and translators–that are not otherwise paid by the Indian tribe or Native Hawaiian organization to work with agencies. Park and support office administrative personnel can suggest ways of paying for consultation services, including invited travel procedures (when no consultation fees are involved) and purchase orders that pay for professional services rendered. It is generally not appropriate to pay travel and per diem costs and consulting fees for any nonfederal officials to attend general public meetings or hearings.

f. Good Faith

Federal consultation efforts must be conducted in good faith; that is, in a manner that implies honesty, fair dealing, and full revelation. There is currently no case law to clarify how the good faith standard will be applied to consultations conducted under NAGPRA. A recent case involving the National Historic Preservation Act provides a useful analogy [Pueblo of Sandia v. United States, No. 93-2188]. In July 1988 the Forest Service released a Draft Environmental Impact Statement detailing eight alternative management strategies for Las Huertas Canyon in the Cibola National Forest, New Mexico. The National Historic Preservation Act required the Forest Service to "take into account the effect of the undertaking on any district, site, building, structure, or object that is included in or eligible for inclusion in the National Register." The administrative record revealed that during the assessment phase of the project, the Forest Service had mailed letters asking local Indian tribes, including the Pueblo of Sandia, to describe the location of sites and the nature and frequency of activities conducted within the project area. Forest Service officials also addressed meetings of the All Indian Pueblo Council (a nonfederally recognized entity composed of elected pueblo representatives) and the Pueblo of San Felipe. None of the tribes provided the Forest Service with the type of information requested in the letters and meetings. In the ensuing months, however, the Forest Service was provided two affidavits outlining generalized traditional uses in Las Huertas Canyon. Voicing concerns that the proposed alternative would adversely impact traditional cultural properties and practices in the canyon, the Pueblo of Sandia filed an administrative appeal of the decision, accompanied by one of the two affidavits. When the Deputy Regional Forester affirmed the decision, the pueblo filed suit in federal court. When the court granted summary judgement to the Forest Service, the Pueblo of Sandia appealed to the Tenth Circuit, accompanied by the second affidavit. On March 14, 1995, the Tenth Circuit ruled that the Forest Service's requests in form letters and at tribal meetings for specific information about cultural Native American activities were not reasonable efforts to identify historic properties. Pueblo of Sandia v. United States makes it clear that superintendents must give careful consideration to how consultation is conducted, particularly regarding the way contact with the appropriate Indian tribes is made and maintained and how information is collected and managed.

7. HOW DO YOU EVALUATE A REQUEST?

Upon the request of a lineal descendant, Indian tribe, or Native Hawaiian organization, the NPS must expeditiously return human remains, funerary objects, sacred objects, or objects of cultural patrimony if *all* the following criteria apply: (1) the claimant has standing, (2) the claimed object conforms to a class of objects covered by the statute, (3) lineal descent or cultural affiliation can be established between the claimant and an object in NPS control before November 16, 1990. For objects excavated or discovered

on NPS land after November 16, 1990, claims may be based on lineal descent, tribal land status, cultural affiliation, aboriginal territory, or other cultural relationship; and (4) none of the regulatory exemptions apply.

a. Does the request come from a party with standing?

Lineal descendants, Indian tribes, and Native Hawaiian organizations have standing to request human remains, funerary objects, and sacred objects in federal agency and museum collections or excavated or discovered on federal or tribal lands. By definition, only Indian tribes and Native Hawaiian organizations have standing to claim objects of cultural patrimony.

Lineal descendants have standing to claim human remains, funerary objects, and sacred objects. Objects of cultural patrimony, that are by definition communal property, can not be claimed by a lineal descendant.

There are currently 763 *Indian tribes*, including Alaska Native villages and corporations, that have standing to make requests under the statute. The current list of Indian tribes is available from the Departmental Consulting Archeologist. Each Indian tribe has full authority to select a representative of its choice, as well as to cooperate with other Indian tribes of its choice. Some tribal representatives are not members of the Indian tribe. Care should be taken to ensure that an individual claiming to represent an Indian tribe is authorized to make such a request. If there is any doubt, call the tribal chair, governor, or president to verify that the individual is acting on behalf of the Indian tribe or Native Hawaiian organization. Some Indian tribes have banded together to establish or identify organizations to act formally on their behalf for the purposes of NAGPRA. For example, the Wabanaki Tribes of Maine was established in 1992 to represent the repatriation interests of the Penobscot Indian Nation, the Passamaquoddy Tribe, the Houlton Band of Maliseet Indians, and the Aroostook Band of Micmac. In 1995 all nine Apache tribes signed an agreement authorizing an individual tribe to make requests on behalf of any of the others. In these cases, a formal written agreement will exist among the Indian tribes describing their agreement and identifying their representatives. In other situations, the traditional property owning entity within an Indian tribe–such as a clan or society–does not have standing to make a request but acts through the appropriate Indian tribe. Thus, in 1993 the Yanyeidi clan requested a clan hat as its cultural patrimony through the Douglas Indian Association, the federally recognized Indian tribe to which the clan members belonged.

The statute specifically identifies two *Native Hawaiian organizations*–Hui Malama I Na Kupuna 'O Hawai'i Nei and the Office of Hawaiian Affairs–and provides criteria to determine if other claimants have standing. To qualify, the organization must demonstrate that it (1) serves and represents the interests of Native Hawaiians, (2) has as a primary and stated purpose the provision of services to Native Hawaiians, and (3) has expertise in Native Hawaiian affairs. Other organizations that have been identified in published *Federal Register* notices as culturally affiliated with Native Hawaiian remains and have participated in requests include the Hawaii Island Burial Council, Molokai Island Burial Council, Kauai/Nihau Island Burial Council, O'ahu Island Burial Council, Maui/Lanai Island Burial Council, and Hui Malama Pono 'O Lana'i.

b. Does the object fit a category?

Four types of objects can be claimed under provisions of the statute: human remains, funerary objects, sacred objects, and objects of cultural patrimony. For full definitions of these terms see section 2 above.

Native American *human remains* can generally be identified based on their morphological characteristics and the context in which they were recovered.

Funerary objects can generally be identified based on the context in which they were recovered.

Sacred objects are those identified by a traditional religious leader as being needed for the practice of a traditional Native American religion by its present-day adherents.

Objects of cultural patrimony are those identified by an Indian tribe or Native Hawaiian organization as having ongoing historical, traditional, or cultural importance. Generally, anthropological, folkloric, oral

traditional, or historic evidence is also needed to show that the object was considered inalienable at the time the object was separated from the group.

c. Is there a documented relationship between the object and the requesting party?

An individual, Indian tribe or Native Hawaiian organization with standing must establish one of five possible relationships with the human remains, funerary object, sacred object, or object of cultural patrimony being claimed: (1) lineal descent, (2) tribal land ownership, (3) cultural affiliation, (4) aboriginal occupation, or (5) other cultural relationship. The criteria for establishing a valid relationship vary depending on whether the objects are part of a federal agency or museum collection or are excavated or discovered on federal or tribal land. Only lineal descendants (1) and culturally affiliated Indian tribes and Native Hawaiian organizations (3) have standing to request the repatriation of objects that were part of NPS collections on November 16, 1990. All five categories of parties have standing to request the disposition of objects excavated or discovered on NPS land after that date.

An individual claiming *lineal descent* should be asked to document his or her ancestry from the individual whose remains, funerary objects, or sacred objects are being claimed. The line of descent must be direct and without interruption according to the traditional kinship system of the appropriate Indian tribe or Native Hawaiian organization or by the common law system of descendance. An Indian tribe or Native Hawaiian organization can often provide information on its traditional kinship system to assist in verifying claims of lineal descent. Lineal descendants have priority in requesting human remains, funerary objects, and sacred objects in NPS collections as well as those excavated or discovered on NPS lands.

The *land-owning Indian tribe* is second in priority, after the lineal descendant, in determining the custody of human remains, funerary objects, and sacred objects, and first in priority for objects of cultural patrimony, that are excavated or discovered on tribal lands after November 16, 1990. Tribal lands include all lands within the exterior boundaries of any Indian reservation including, but not limited to, allotments held in trust or subject to a restriction on alienation by the United States. This may include some federal, state, or private lands that are within the exterior boundary of a reservation. In and of itself, reserved rights to tribal lands do not provide the Indian tribe standing to request human remains, funerary objects, sacred objects, and objects of cultural patrimony that were in federal agency or museum collections before November 16, 1990.

Cultural affiliation is a relationship of shared group identity that can reasonably be traced historically or prehistorically between members of a present-day Indian tribe or Native Hawaiian organization and an identifiable earlier group. A wide variety of evidence can be introduced to document such a relationship, including geographic, kinship, biological, archeological, linguistic, folklore, oral tradition, historic evidence, and other information or expert opinion. Unlike claims of lineal descent in which the relationship between the claimant and the individual whose remains or objects are claimed must be direct and without interruption, determination of cultural affiliation should be based on an overall evaluation of the totality of the circumstances and evidence and should not be precluded solely because of some gaps in the record. Culturally affiliated Indian tribes may claim human remains, funerary objects, sacred objects, and objects of cultural patrimony in federal agency and museum collections as well as those excavated or discovered on federal or tribal lands.

The *aboriginal occupant* is fourth in priority–after the lineal descendant, tribal land owner, and culturally affiliated Indian tribe–in determining the custody of human remains, funerary objects, and sacred objects, and third in priority for objects of cultural patrimony, that are excavated or discovered on tribal lands after November 16, 1990. The 1978 final report of the Indian Claims Commission included a map of those lands determined to be the aboriginal territory of particular Indian tribes. Other determinations of tribal aboriginal lands have been made by Congress and the U.S. Court of Claims (now the U.S. Court of Federal Claims). Congress, the commission, and the court considered a wide range of information, including oral history and anthropological evidence, in reaching their decisions and have provided valuable tools for identifying areas occupied aboriginally by present-day Indian tribes. Other sources of information regarding aboriginal occupation should also be consulted. In and of itself, aboriginal occupation does not provide standing to claim human remains, funerary objects, sacred objects, and objects of cultural patrimony in federal agency or museum collections before November 16, 1990.

Indian tribes with some *other cultural relationship* are fifth in priority–after the lineal descendant, tribal land owner, culturally affiliated Indian tribe, and aboriginal occupant–in determining the custody of human

remains, funerary objects, and sacred objects, and fourth in priority for objects of cultural patrimony, that are excavated or discovered on tribal lands after November 16, 1990. This term is not defined in the statute or regulations, but clearly constitutes a weaker relationship than those previously listed. In and of itself, this other cultural relationship does not provide standing to claim human remains, funerary objects, sacred objects, and objects of cultural patrimony in federal agency or museum collections before November 16, 1990.

In some cases, more than one lineal descendant, Indian tribe, or Native Hawaiian organization may claim particular human remains, funerary objects, sacred objects, or objects of cultural patrimony. The superintendent faced with this situation should first assess all claims in light of the priorities of disposition in regulation at 43 CFR 10.6(a) for planned excavations and inadvertent discoveries and 43 CFR 10.10 for collections in NPS control.

d. Do any exemptions apply?

The NPS may retain control of Native American human remains, funerary objects, sacred objects, or objects of cultural patrimony that would otherwise be repatriated or disposed of to a lineal descendant, Indian tribe, or Native Hawaiian organization under the regulations if any of three exemptions apply: (1) there are multiple disputing claimants, (2) the NPS has right of possession to the item, or (3) the item is part of an NPS collection and is indispensable to the completion of a specific scientific study, the outcome of which is of major benefit to the United States.

The NPS may retain control of human remains, funerary objects, sacred objects, or objects of cultural patrimony that are discovered, excavated, or part of a collection if there are *multiple disputing claims* and the agency cannot determine by a preponderance of the evidence which requesting party is the most appropriate recipient. The disputed items may be retained until the requesting parties mutually agree on the appropriate recipient or the dispute is otherwise resolved pursuant to the regulations or by a court of competent jurisdiction. There is no set time during which multiple claims must be resolved.

The NPS may retain control of human remains, funerary objects, sacred objects, or objects of cultural patrimony that are discovered, excavated, or part of a collection if the agency has *right of possession* to the items. Right of possession means possession obtained with the voluntary consent of an individual or group that had authority of alienation. The original acquisition of Native American human remains and associated funerary objects that were excavated, exhumed, or otherwise obtained with the full knowledge and consent of the next of kin or the official governing body of the appropriate culturally affiliated Indian tribe or Native Hawaiian organization is deemed to give right of possession to those remains and funerary objects. The original acquisition of a Native American unassociated funerary object, sacred object, or object of cultural patrimony from an Indian tribe or Native Hawaiian organization with the voluntary consent of an individual or group with authority to alienate such object is deemed to give right of possession to that object.

The NPS may retain control of human remains, funerary objects, sacred objects, or objects of cultural patrimony that are part of a collection if the items are *indispensable to the completion of a specific study*, the outcome of which is of major benefit to the United States. In such circumstances, the items must be returned to the appropriate lineal descendant, Indian tribe, or Native Hawaiian organization no later than 90 days after completion of the study.

e. Standard of Proof

The preponderance of the evidence represents the standard of proof needed to evaluate claims made under the statute. Claimants do not have to establish aspects of their claims with scientific certainty. However, it is the responsibility of the NPS to determine to its satisfaction whether the evidence substantiates the claim.

f. Final Administrative Decision

After careful consideration of all of the available evidence, the superintendent must decide whether a valid claim can be made for human remains, funerary objects, sacred objects, and objects of cultural patrimony under his or her control. Support office or center archeologists, ethnographers, curators, and

Native American liaisons can provide assistance in making this important decision. Superintendents must document their decisions as completely as possible.

The timing of this decision depends on the type of object being considered and when the object came under NPS control. Decisions regarding the repatriation of human remains and associated funerary objects in NPS collections before November 16, 1990, were required to be made by November 16, 1995, with notification of the decision going to the appropriate lineal descendants by May 16, 1996. Copies of the completed inventories were sent to each lineal descendant and each culturally affiliated Indian tribe and Native Hawaiian organization, as well as to the Departmental Consulting Archeologist. One hundred parks completed inventories identifying 4,982 human remains. Approximately 77 percent of those human remains were identified as being related to lineal descendants or culturally affiliated Indian tribes or Native Hawaiian organization. Approximately 23 percent of the human remains in NPS collections were determined to be culturally unidentifiable. Copies of listings of culturally unidentifiable human remains were also sent to the Departmental Consulting Archeologist for referral to the Native American Graves Protection and Repatriation Review Committee.

Unlike the inventory decisions that are driven by a statutory deadline, decisions regarding the repatriation of unassociated funerary objects, sacred objects, and objects of cultural patrimony are request-driven. In 1993 summaries of these items were distributed to nearly 800 Indian tribes, Native Hawaiian organizations, and nonfederally recognized Indian groups, as well as to the Departmental Consulting Archeologist. Many Indian tribes and Native Hawaiian organizations have responded to the summaries by requesting additional documentation and visiting the collections. Regulations stipulate that decisions regarding repatriation of unassociated funerary objects, sacred objects, and objects of cultural patrimony must take place within 90 days of receipt of a valid request.

Decisions about the disposition of human remains, funerary objects, sacred objects, and objects of cultural patrimony excavated or discovered on NPS lands need to be made expeditiously upon receipt of a valid request.

g. Notification Requirements

Before the repatriation of human remains, funerary objects, sacred objects, and objects of cultural patrimony in NPS collections, the Secretary of the Interior is required to publish a notice in the *Federal Register*. A *Notice of Inventory Completion* summarizes the contents of a completed inventory of human remains and associated funerary objects in sufficient detail to enable other individuals, Indian tribes, and Native Hawaiian organizations to determine their interest in claiming the inventoried items. Repatriation of human remains and associated funerary objects may not occur until at least 30 days after publication of the Notice of Inventory Completion in the *Federal Register*. A *Notice of Intent to Repatriate* describes unassociated funerary objects, sacred objects, or objects of cultural patrimony being claimed in sufficient detail to enable other individuals, Indian tribes, and Native Hawaiian organizations to determine their interest in the claimed objects. Repatriation of unassociated funerary objects, sacred objects, and objects of cultural patrimony may not occur until at least 30 days after publication of the Notice of Intent to Repatriate in the *Federal Register*.

Notification before the disposition of human remains, funerary objects, sacred objects, and objects of cultural patrimony excavated or discovered on federal or tribal lands after November 16, 1990, is provided through *newspaper notification*. The notice must be published two times, at least one week apart, in a newspaper of general circulation in the area in which the human remains, funerary objects, sacred objects, or objects of cultural patrimony were excavated or discovered and, if applicable, in a newspaper of general circulation in the area(s) in which affiliated Indian tribes or Native Hawaiian organizations now reside. Disposition of human remains, funerary objects, sacred objects, or objects of cultural patrimony may not occur until at least 30 days after publication of the second notice. Copies of the newspaper notice with information on when and in what newspaper it was published must be sent to the Departmental Consulting Archeologist.

Notification is not meant as a primary means of communication with potential claimants but as a last chance for any legitimate claimants that may have been overlooked to voice their concerns.

h. Appeals

In some cases, it may not be possible for the NPS and the interested individuals, Indian tribes, and Native Hawaiian organizations to agree on the disposition or repatriation of particular human remains, funerary objects, sacred objects, and objects of cultural patrimony.

A lineal descendant, Indian tribe, or Native Hawaiian organization may decide to present more evidence following a superintendent's decision not to dispose or repatriate particular objects. This situation is most likely to arise regarding the repatriation of human remains and associated funerary objects in NPS collections since, because of the statutory deadline for inventory completion, some information may not have been readily available at the time the decision was made. Such additional evidence should be given full consideration by the superintendent and the decision regarding disposition or repatriation revised if necessary.

The Native American Graves Protection and Repatriation Review Committee is charged with facilitating the resolution of disputes among lineal descendants, Indian tribes, Native Hawaiian organizations, museums, and federal agencies relating to the return of human remains, funerary objects, sacred objects, and objects of cultural patrimony. The review committee will consider requests to facilitate the resolution of a dispute from any of the involved parties. If the review committee decides to attempt to facilitate the dispute, it will initially request written documentation regarding the dispute from all involved parties. This information will be reviewed and, if appropriate, the disputing parties will be invited to appear before the committee. Review committee recommendations and findings are not binding.

Generally, court action or litigation to resolve such disputes over the disposition or repatriation of human remains, funerary objects, sacred objects, and objects of cultural patrimony should be avoided. For NAGPRA, judicial remedies are a last resort for situations when no other mutually acceptable solution can be achieved.

i. Disposition or Repatriation

Disposition or repatriation of human remains, funerary objects, sacred objects, and objects of cultural patrimony has occurred when the control or custody has been transferred from the NPS to the appropriate lineal descendant, Indian tribe, or Native Hawaiian organization.

When transferring control or custody, the superintendent must ensure that the human remains, funerary objects, sacred objects, and objects of cultural patrimony are deaccessioned according to NPS procedures, including assigning deaccession numbers, updating accession and catalog records, completing a deaccession form, and filing all documentation in the accession or optional deaccession file. For further guidance on deaccessioning, consult Part II of the NPS *Museum Handbook*.

Preparation for disposition or repatriation must also involve additional consultation with the appropriate lineal descendant, Indian tribe, or Native Hawaiian organization to determine the place and manner of delivery [25 USC 3005(a)(3)].

The NPS is under no statutory or regulatory obligations regarding what happens to human remains, funerary objects, sacred objects, or objects of cultural patrimony once control or custody has been transferred to the appropriate lineal descendant, Indian tribe, or Native Hawaiian organization.

8. HOW DO YOU DOCUMENT ADMINISTRATIVE DECISIONS?

a. The Administrative Record

The administrative record must document all disposition or repatriation actions. It must include documentation of the human remains, funerary objects, sacred objects, or objects of cultural patrimony under consideration and copies of all written correspondence, a log of all telephone conversations, documentation of all consultation meetings, and copies of all agreements between the relevant parties. The original file should be retained by the park as part of the museum archive collection and, if appropriate, the archeological site file. A copy should be sent to the support office or center that maintains records concerning park archeology or museum collections. These files should be retained even after the

disposition or repatriation of the relevant human remains, funerary objects, sacred objects, and objects of cultural patrimony.

b. Confidentiality

In some situations, the information needed by the superintendent to make a decision regarding applicability of the statutory terms to particular objects may be considered extremely sensitive by Indian tribe and Native Hawaiian organization representatives. The NPS has a limited ability to protect sensitive information from public disclosure.

The Freedom of Information Act gives any person the right to access federal agency records, except to the extent that such records are protected from disclosure by one of nine exemptions or three special law enforcement record exclusions. There is no specific provision in NAGPRA that protects sensitive information from public disclosure. Other disclosure limitations, such as those in the Archaeological Resources Protection Act and the National Historic Preservation Act, may provide some flexibility in protecting sensitive information from public disclosure. ARPA requires that information concerning the nature and location of any archeological resource whose excavation or removal requires a permit may not be made available to the public without the consent of the appropriate federal land manager pursuant to the conditions outlined at 16 USC 470hh. The National Historic Preservation Act requires the head of a federal agency or other public official to withhold from disclosure to the public information about the location, character, or ownership of a historic resource if the Secretary of the Interior and the agency determine that disclosure would cause a significant invasion of privacy, risk harm to the resource, or impede the use of a traditional religious site by practitioners [16 USC 470w-3].

It is important to be candid with Indian tribe and Native Hawaiian organization representatives about the limited protection that can be given to sensitive information. A representative of the Office of the Solicitor should be involved before any agreement regarding the confidentiality of consultation information. During consultation, the superintendent should not request more information than is needed to reach a decision regarding the disposition or repatriation of human remains, funerary objects, sacred objects, and objects of cultural patrimony.

9. TRAFFICKING IN NATIVE AMERICAN HUMAN REMAINS AND CULTURAL ITEMS

Section 4 of NAGPRA makes it illegal to traffic in Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. Section 4(a) stipulates that whoever knowingly sells, purchases, uses for profit, or transports for sale or profit the human remains of a Native American without the right of possession to those remains shall be fined and/or imprisoned [18 USC 1170(a)]. Section 4(b) stipulates that whoever knowingly sells, purchases, uses for profit, or transports for sale or profit any Native American cultural items (funerary objects, sacred objects, and objects of cultural patrimony) obtained in violation of the statute shall be fined and/or imprisoned [18 USC 1170(b)].

One example of enforcement of the prohibition involves Native American human remains from an NPS area. On January 19, 1994, Richard Phillip Maniscalco knowingly transported and sold a variety of items taken from Little Bighorn Battlefield National Monument. One of the items sold was a Native American leg bone. No ARPA permit had been issued to excavate or remove the items from the monument. Maniscalco pled guilty to trafficking in Native American human remains without right of possession [18 USC 1170(a)] and trafficking in archeological resources illegally excavated, removed, and obtained from federal property [16 USC 470ee]. On December 21, 1995, Maniscalco was sentenced in Alexandria, Virginia, to one year probation and fined $1,500. Maniscalco also paid $1,500 to facilitate repatriation of the human remains to the culturally affiliated Indian tribe.

10. ADDITIONAL INFORMATION

Further information and technical assistance in implementing NAGPRA is available from NPS support offices, centers, and the NAGPRA Team, Archeology & Ethnography Program, National Center for Cultural Resources Stewardship and Partnership Programs.