

**National Park Service
U.S. Department of the Interior**



MANZANAR NATIONAL HISTORIC SITE

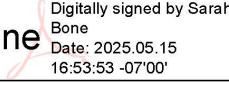
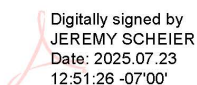
Scope of Collection Statement

April 2025



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U.S. DEPARTMENT OF THE INTERIOR**NATIONAL PARK SERVICE****Manzanar National Historic Site****SCOPE OF COLLECTION STATEMENT**

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I. INTRODUCTION

Acquisition of museum objects is governed by the site's ability to manage and preserve materials according to NPS Management Policies, Chapter 5 (2006), the standards for managing museum objects in NPS-28: Cultural Resources Management Guideline (1998); Special Directive 80-1 Guidance for Meeting NPS Preservation and Protection Standards for Museum Collections (1990); and the NPS Museum Handbook I-III. See section IV Acquisitions for more information.

1. Executive Summary

Manzanar National Historic Site (MANZ or site) was established by Congress (PL 102-248) on March 3, 1992, to “provide for protection and interpretation of historical, cultural, and natural resources associated with the relocation of Japanese Americans during World War II.” While Manzanar is best known for its history as a Japanese American incarceration site, its layers of the past echo the larger themes of American history, including displacement of native peoples, the settlement of ranchers and farmers, water wars, and the consequences of prejudice. The site was expanded to 813 acres by the implementation of PL 104-333 on November 12, 1996.

Within the National Park Service (NPS), sites that protect and interpret incarceration stories of Japanese Americans during World War II are known as Japanese American Confinement Sites (JACS). To date, NPS JACS include Manzanar National Historic Site, Minidoka National Historic Site, Tule Lake National Monument, Honouliuli National Monument, and Amache National Historic Site.

The MANZ museum collection is primarily a cultural history collection, which includes: archeological materials systematically excavated from within the site's boundaries and associated field records (circa 1000 – circa 1945); an ethnology collection of Paiute and Shoshone baskets, beads, projectile points, and interviews; historic objects associated with the area's 19th century homesteaders, orchard history, and items related to the World War II relocation of Japanese Americans from 1942-45; and archival, oral history, photographic, scientific, and resource management records.

Manzanar is home to an extensive and growing collection of oral history interviews that document the World War II history of Japanese Americans at Manzanar. Because Manzanar was established before other JACS in the NPS, staff also collected oral history interviews detailing incarceration experiences at other camps to ensure these histories were captured. Personal accounts include the stories of former incarcerated at various camps, War Relocation Authority staff and their children, military personnel, and residents of the communities neighboring the camps. Topics covered include immigration, settlement, forced removal, life behind barbed wire, and resettlement after incarceration. The oral history project also documents other eras at Manzanar, including Indigenous experiences, Owens Valley and Los Angeles water conflicts, and the Manzanar orchard community.

The Cemetery Collection (governed by the Cemetery Collection Management Plan) is also unique in that, although the offerings and memorabilia left at the historic cemetery are contemporary and ongoing, it also has potential historical significance. Consequently, the NPS

recognizes that many of the offerings and memorabilia left at the cemetery are worthy of collection and preservation.

Donations to the museum collection often come from those who were incarcerated at Manzanar or from the descendants or families of Manzanar incarcerated. The donations reflect deeply personal and extremely difficult events whose impacts are felt through generations. Staff at MANZ consider donations of such items an honor that may be the beginning of an important relationship fostered with formerly incarcerated individuals and their families. The interpretive themes and techniques at MANZ rely heavily on personal stories and experiences. The museum collection is used daily by interpretive staff to help tell these complex stories to future generations. The relationships built through the museum donation process should continue to foster the conversations needed to ensure Manzanar National Historic Site is part of the learning and healing process into the future.

At present, the majority of the site's museum collections are stored off-site with some objects exhibited at MANZ. The site's archeological collections and associated records (archives) are stored at the Western Archeological and Conservation Center (WACC), in Tucson, AZ and Death Valley National Park (DEVA) in Death Valley, CA. DEVA is the designated storage repository for MANZ collections including historic objects, archives (including oral histories), natural history specimens, and official MANZ museum records. In addition, objects are on display in the MANZ Visitor Center, a 1944-constructed auditorium that was rehabilitated in 2004. As documented in the site's FY2024 Collections Management Report (CMR), there are currently 96,228 cataloged objects and 57,536 catalog backlogged objects in the MANZ collection.

Current museum storage at WACC and DEVA is adequate for the present collection, but not for growth of the collection. Areas of projected growth include the ongoing accumulation of archival material in accordance with records disposition schedules, the continued collection and donation of material pertinent to the history of the site, and the ongoing accumulation of field collections of archeological materials due to research and compliance.

For additional information on the museum collection, please contact the Death Valley National Park Museum Curator at deva_curator@nps.gov or Manzanar National Historic Site staff at manz_information_request@nps.gov.

2. Purpose of the Scope of Collection Statement

This [Scope of Collection Statement \(SOCS\)](#) defines the composition of present and future museum collection holdings of Manzanar National Historic Site that contribute directly to the understanding and interpretation of the site's purpose, themes, and resources, as well as those objects that the National Park Service is legally mandated to preserve. The SOCS is designed to ensure that the entirety of the museum collection is clearly relevant to the site and sets appropriate limits for acquisition. The SOCS is intended to be an evolving document which must be reviewed on a regular basis (minimum 5 years). Updates/changes should be made through interdisciplinary efforts of park and regional subject matter experts ([411.1 DM](#))

[Director's Order #24: NPS Museum Collection Management](#) states that NPS units with museum collections must:

- Approve and keep current a Scope of Collection Statement to identify the scope of collecting activities and define the purpose of the collection. (DO 24 4.3.6)
- Ensure that the statement is consistent with natural resource and archeological permit conditions. (4.3.6)
- Ensure acquisitions are consistent with the Scope of Collection Statement. (4.3.6)
- Deaccession objects inconsistent with the Scope of Collection Statement. (4.3.18)

Refer to the Use and Restrictions Appendix for other legislation and NPS legal authorities to acquire and preserve museum collections.

This statement is designed to ensure that all museum objects and specimens are clearly relevant to the mission of the site. This statement is revised from 1992, 2000, and 2015 drafts.

In 2020, an effort was made to review all JACS' Scope of Collections Statements as a group. While identified themes overlap heavily, each site has unique stories to tell and currently maintain individual SOCS. Further work should be undertaken to better understand the uniqueness and similarities between collections held at JACS, with the possibility of assembling a joint Collections Advisory Committee and joint SOCS to address collections concerns common to all JACS.

3. Context for MANZ Museum Collection

This section is compiled from NPS and non-NPS histories, reports, and plans, and provides context for museum collection acquisition. It is not intended to be comprehensive. For additional information about sources used, refer to the Selected Bibliography Appendix.

A. Park Purpose and Significance

The site's Foundation Document (2016) states:

The purpose of Manzanar National Historic Site is to preserve Manzanar's cultural and natural resources and interpret the forced removal and incarceration of Japanese Americans and Japanese immigrants during World War II.

In April 2006 MANZ adopted a Mission Statement that defines its significance:

Manzanar National Historic Site preserves the stories and resources of Manzanar for past, present, and future generations. We facilitate experiences that weave the stories of the various eras of Manzanar faithfully, completely, and accurately. Manzanar provides leadership for the protection and interpretation of associated sites. From this foundation, the park stimulates dialog and greater understanding of civil rights, democracy, and freedom.

B. History of MANZ and MANZ Museum Collections

The MANZ museum collection began in 1992 when a small collection of historic artifacts were returned to the site by a visitor and accessioned into the MANZ collection and stored at DEVA. The collection has grown to include donations of historic artifacts and archives and field collections of surface finds from the site. The collection now numbers over 153,000 mostly archeology and archives items.

Prior to the establishment of MANZ, collections related to Manzanar's themes were donated to a number of repositories including the Smithsonian Institution (Washington DC), Japanese American National Museum (Los Angeles, CA), California State University (Fullerton, CA), and Eastern California Museum (ECM, Independence, CA). The General Management Plan (GMP) (1996) states that in lieu of extensive NPS curation, cooperative efforts with other organizations should be considered.

ECM is a local repository established in 1928. Since 1992, MANZ and ECM have worked cooperatively on efforts including research and oral history compilations, interpretive planning and programs for MANZ, and exhibition of ECM museum collections. The GMP proposed that the NPS provide support to the ECM for the development of additional facilities at the ECM to house Manzanar collections, with the intention that NPS would own only a small collection of artifacts for permanent exhibits and encourage future donations to the ECM. This did not occur because the ECM did not own the land for additional facilities (ECM is located on land leased from the Los Angeles Department of Water and Power). The MANZ collection continued to grow without a permanent home at ECM. The MANZ Museum Management Plan (2012) determined MANZ collections should be consolidated at DEVA.

Since 2000, MANZ museum collections have been formally stored at the Western Archeological and Conservation (WACC) in Tucson, AZ and in CC345 at DEVA. The MANZ's museum collections are currently managed by the MANZ Curator-of-Record (DEVA Curator, designated by the MANZ Superintendent, April 2023), the MANZ Museum Program Liaison, and WACC museum staff. DEVA curators wrote a draft SOCS in 1992. The draft was revised in 2000 and approved in 2015. Since FY1994, the DEVA Curator responds to annual NPS budget requests and submits annual accomplishment reports for the MANZ collection. The DEVA Curator completes the annual NPS Checklist for Preservation and Protection of Museum Collections and submits NPS Annual Inventory Program reports. The DEVA Curator completes the above reporting requirements for MANZ, maintains the site's accession book, distributes catalog numbers as needed, rehouses objects, performs preventative conservation and facilities maintenance, and processes loans.

Since 1993 there have been numerous archeological surveys and excavations at the site that have generated extensive archeological collections and associated records. There has been very little associated cataloging of these items prior to 2006. In addition, extensive archives from the Manzanar Committee and other sources were donated to the archive collection, with little or no cataloging occurring. As of FY2024, there remains a cataloging backlog of approximately 57,536 items. The hiring of Student Conservation Association interns in 2023 led to an increase in cataloged items.

Further information can be found in the site's [administrative history](#) (2018).

C. Collection Themes and Categories

The site's Foundation Document (2016) identifies the following interpretive themes:

- 1) **Injustice:** The mass incarceration of Japanese Americans and Japanese immigrants by the U.S. government during World War II resulted from a complex mix of political, social, and economic factors and was fueled by war hysteria, a failure of political leadership, and long-standing racial prejudice. This failure of constitutional protections was so flagrant that the U.S. government later apologized and paid redress.
- 2) **Stories, Perspectives, and Communities:** Manzanar's World War II history is not a single story, but a diverse mosaic of individual and collective experiences of Japanese Americans, WRA staff and families, military police, residents of neighboring towns and tribal communities, and many others whose lives were often influenced by forces far beyond their control.
- 3) **Physical Setting:** Though mostly vacant today, during World War II Manzanar was densely crowded, with over 800 structures and more than 10,000 people confined in a 540-acre area, surrounded by armed military police and a barbed-wire fence. Within months, the army constructed eight guard towers. The stark mountain and desert landscape and the environmental conditions of the Owens Valley evoked strong and varied reactions in individuals, including feelings of isolation and forlornness, as well as consolation and hope.
- 4) **Clashing Views:** Differences of opinion and ideology in Manzanar significantly affected daily life within the camp. While these differences were sometimes rooted in people's prewar experiences and associations, they often stemmed from reactions to loss of constitutional rights, confinement, and continued impositions by the WRA. Clashing views among Japanese Americans at Manzanar and with the WRA culminated in tragedies like the Manzanar "Riot," the consequences of which reverberated throughout all of the WRA facilities and impacted those incarcerated in them.
- 5) **Pre-World War II Owens Valley History:** Manzanar's prewar history echoes broad themes in U.S. history, including displacement of native peoples, land and water wars, clashing views on immigration, and the question of who is considered "American."
- 6) **Advocacy:** Growing out of the civil rights movement of the 1960s, the Manzanar Pilgrimage became the focal point of efforts to learn about, reflect on, remember, and preserve this site. Both the annual pilgrimage and grassroots efforts to gain recognition for Manzanar helped to inspire and strengthen later efforts to preserve other camps. Manzanar is increasingly relevant to diverse constituencies who see their own struggles reflected in its history.
- 7) **Owens Valley Water:** Water use, exportation, and management in the Owens Valley—especially by the LADWP—influenced major aspects of Manzanar's history, including

the camp's location in the abandoned orchard town of Manzanar, its operation, the daily activities of Japanese Americans incarcerated at Manzanar, and the survival of historic orchards and vegetation following the camp's closure. The City of Los Angeles still imports water from the Owens Valley.

The MANZ museum collections will support the site's interpretive program as it reflects the above interpretive themes. Museum collections are used for exhibits, NPS research projects, and to answer information requests from researchers, the descendent community, and the public.

Other related management planning or resource study documents include:

- *The Evacuation and Relocation of Persons of Japanese Ancestry During World War II: A Historical Study of the Manzanar War Relocation Center, Historic Resource Study/Special History Study*, 1996
- *Three Farewells to Manzanar: The Archeology of Manzanar National Historic Site, Inyo County, California*, 1996
- *Native American Consultations and Ethnographic Assessment, The Paiutes and Shoshones of Owens Valley, California*, 1996
- *History and Preservation of the Community Auditorium-Gymnasium, Historic Structure Report*, 1999
- *Historic Furnishings Report, Manzanar National Historic Site*, 1999
- *I Rei To, Archeological Investigations at the Manzanar Relocation Center Cemetery*, 2001
- *Landscape Stabilization Plan, Manzanar National Historic Site*, 2005
- *Manzanar National Historic Site Cultural Landscape Report*, 2006
- *Manzanar National Historic Site Collection Condition Survey* 2007
- *Manzanar National Historic Site Long-Range Interpretive Plan* 2007
- *Orchard Management Plan, Manzanar National Historic Site* 2010
- *Manzanar National Historic Site Museum Management Plan*, 2012
- *Museum Collection Emergency Operations Plan* 2012
- *Museum Collections Storage Plan* 2014
- *Garden Management Plan: Gardens and Gardeners at Manzanar* 2015
- *Foundation Document, Manzanar National Historic Site* 2016

D. Special Designations

In 1972, Manzanar was designated as California Registered Historic Landmark No. 850. The Manzanar War Relocation Center was listed on the National Register of Historic Places in 1976. In 1977, the City of Los Angeles Cultural Heritage Board declared Manzanar a City Historic Landmark, and it was designated as a National Historic Landmark in 1985. The site is also recognized by the International Coalition of Sites of Conscience.

II. TYPES OF COLLECTIONS

This section describes the contents, present and future, of the site's cultural collection and natural history collection.

Approximately 142,300 MANZ cultural and natural history items are stored at DEVA. Approximately 134 items are exhibited at the Manzanar Interpretive center. Over 11,300 MANZ cultural items are stored at WACC via a DEVA-managed loan agreement.

1. Cultural Collection

The purpose of the cultural resource collection is to provide for research, education, exhibits, and support resource management goals and projects. The museum collection includes material from the disciplines of history, archeology, ethnology, and archives and records. The following list identifies by discipline, object or artifact types that are appropriate to acquire for the museum collection.

Artifacts, archives, and associated records previously collected from the site that are housed in other repositories have been documented (including location) and cross-referenced. These early collections yield important information and lend insight to resource management and interpretive goals and objectives for the site.

The cultural collection is subdivided into five disciplines: archeology, ethnology, history, art, and archival and manuscript collections. All five disciplines are represented in the MANZ museum collection, with the largest portion made up of the Archival/Manuscript collection. Major themes include historic material specifically associated with the incarceration of Japanese Americans at Manzanar during World War II (from 1942 through 1945), Japanese American history, constitutional and human rights, and Owens Valley history.

An object from the site or directly associated with person(s) or event(s) commemorated by the park is more desirable than a similar object without such association. Future growth of the collection should be restricted to items related to:

- Interpretive and/or research needs identified in MANZ approved planning documents and resource studies.
- Service-wide initiatives, if applicable.
- Enhancing the understanding of, and promoting increased stewardship of, the MANZ cultural resources.
- Cultural resources baselines/inventory and monitoring activities.
- Regulatory and compliance activities such as those mandated by the National Historic Preservation Act of 1966, as amended and the Archeological Resources Protection Act of 1979 (ARPA).
- Refer to the Potentially Hazardous Material Appendix for more information.
- Under rare and extenuating circumstances, items from other Japanese American Confinement Sites (JACS) may be considered for acceptance, only if the items cannot otherwise be accepted at their associated JACS or non-NPS repository. Preference

will be given to items with ties to existing collection materials. This decision must be made in coordination with other JACS staff, in addition to the MANZ Collections Advisory Committee and Superintendent (see IV.2. Roles and Responsibilities for Accessioning and Deaccessioning).

A. Archeology Collection

Archeological resources are 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 can reveal scientific or humanistic information through archeological research ([NPS-28: Cultural Resource Management Guideline](#)). Material remains are “artifacts, objects, specimens, and other physical evidence that are excavated or removed in connection with efforts to locate, evaluate, document, study, preserve, or recover a prehistoric or historic resource” ([36 CFR 79.4\(a\)\(1\)](#)). Note that archeologists increasingly use precontact instead of prehistoric.

Legal and ethical [standards](#) provide protection for archeological sites and materials. Artifacts found on the surface by NPS staff and visitors outside of an archeological investigation should be left in place; collecting them removes them from their archeological provenience, degrades sites, and can reduce our understanding of the artifacts and their contexts. If archeological materials are collected outside the parameters of an authorized archeological study and brought to park staff, appropriate measures must be taken to ensure that the visitor or staff member collects no more material, that precise provenience information is recorded, when possible, that park cultural resource staff are notified, and that the objects/data are promptly given to the curatorial staff upon receipt by staff members. Parks should develop appropriate standard operating procedure (SOPS), interpretive messages and staff training to prevent this unauthorized collection of materials. Violations under the [Archaeological Resources Protection Act \(ARPA\), 1979](#), should be promptly reported to park law enforcement officers and the Regional Archeologist.

NPS *Management Policies* (2006, section 5.3.5.1) mandates that archeological resources are managed in situ, unless the removal of artifacts or physical disturbance is justified by research, consultation, preservation, protection, or interpretive requirements. “Data recovery actions will be taken only in the context of planning, consultation, and appropriate decision-making . . . conducted within the scope of an approved research design.” Refer to the Research Design Appendix for a more in-depth discussion of research design development within the context of the permitting process.

Archeology Collection at MANZ

As of Fiscal Year 2024, the Museum Collections Management Report states that the MANZ archeology collection contains 43,192 individual objects, of which 1,831 are in the backlog to be cataloged.

Artifacts and Other Specimens: Archeological collections are generated in response to cultural resource management requirements related to legal mandates, development of site facilities, preservation-related activities, and research requirements. Archeological research projects at MANZ may result in the collection of objects in addition to a variety of other kinds of data. Project design should not incorporate more artifacts than is necessary to meet legitimate project goals. Costs for curation and documentation of these materials will be part of the approved project as specified in 36 CFR Part 79, Curation of federally owned and Administered Archeological Collections.

Formal and informal consultation with members of the Owens Valley Paiute and Shoshone Tribes is conducted regularly as it relates to the acquisition of objects to the collection and in accordance with the Native American Graves Protection and Repatriation Act (NAGPRA) (see III. Park Museum Collections Subject to the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA)).

Consultation with members of the Japanese American community and other affiliated ethnographic groups is currently a site priority as it relates to incarceration-era archeological material, especially regarding material from known or potential grave or sacred sites.

Current Representation: Archeological surveys and excavations conducted soon after the 1992 establishment of the site produced a large collection of artifacts representing relevant precontact and historic periods. Significant archeological research by Tribal, state and other federal agencies outside the site has yielded an excellent comparative framework for analytical studies of the artifacts in the MANZ museum collections. Analysis of these artifacts helps define future archeological fieldwork and refines the precontact and historic timeline of the site.

Mandated acquisitions: Archeological collections, except cultural items as defined by NAGPRA (see 43 CFR 10.2), recovered from within site boundaries through systematic collection must be retained in the MANZ museum collection. [43 CFR 7.13](#), “Custody of Archeological Resources,” requires that archeological resources excavated or removed from public lands remain the property of the United States. Archeological material must be of archeological value and interest, including scientific integrity and replicability.

[NPS Management Policies](#) (2006, section 5.3.5.1) mandate that artifacts and specimens recovered from archeological resources, associated records, and reports will be maintained together in the site museum collection.

Collections (artifacts and/or associated records) may result from research or compliance projects, including historical research, surveys (phase I), test excavations (phase II), and research or mitigative excavations (phase III). Every archeology project will result in materials for the museum collection; even if artifacts are not collected, project records (both physical and digital) must be accessioned and cataloged into the collection. These records may include field notes and catalogs; daily journals; drawings and maps; spatial data; photographic prints, negatives, and slides; photographic logs; sound recordings; raw data sheets; instrument charts; remote sensing data; collection inventories; analytical study data; conservation treatment records; final project reports. The museum curator (or collateral duty museum staff) will work cooperatively with the Project Investigator (archeologist responsible for the project) to make certain that these records

are complete and preserved. Always retain original documents rather than copies whenever possible.

Should be acquired: Confiscated archeological materials recovered from unauthorized and illegal activities in MANZ in violation of ARPA should be acquired. These materials commonly include archeological materials illegally excavated or obtained through uncontrolled surface collecting or excavation by unauthorized individuals within a NPS unit's boundaries. Such objects might be held temporarily by law enforcement following legal chain of custody protocols as evidence if legal action is to be taken but should be formally turned over to museum staff as soon as possible. Museum staff should also be consulted to ensure proper handling and transportation of these materials. Objects resulting from unauthorized and illegal activities in the site should be considered for acquisition, with all associated documentation once all legal questions are resolved.

May be acquired: Surface or diagnostic finds not recovered from systematic excavations, but which have provenience data and are uncommon in the collection and/or suitable for exhibit may be acquired. Collections recovered from within the site before it was created should be considered on a case-by-case basis depending on legal title, provenience data, condition, objects present, size of collection, associated records, etc.

Not to be acquired: The site should discourage visitors from collecting cultural resource materials from site property. Artifacts with no direct provenience within the site, artifacts which lack data, and artifacts with questionable provenance should not be accessioned into the museum collection. Objects excavated from non-NPS property, potentially hazardous material (see the Potentially Hazardous Material Appendix), and any newly discovered human remains and/or NAGPRA cultural items removed from park lands should not be accessioned into the museum collection. Rather, disposition should be addressed through compliance with sections 10.4 through 10.7 of 43 CFR 10 in accordance with the mandated timelines found in 43 CFR 10. See Section III for information about inadvertent discoveries related to NAGPRA.

B. Ethnology Collection

According to NPS-28, [Cultural Resource Management Guidelines \(Chapter 10\)](#), the ethnology classification is used for resources associated with the cultural systems or ways of life, and the related technology, sites, structures, and natural resources of peoples associated with a park from before the park's establishment. 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.

There are four ethnographic resource types that have been assigned cultural significance by traditional users which include sites (archeological or historic places), structures (built features), objects (portable materials), and landscapes (areas containing diverse natural and cultural resources). When natural resources acquire meaning according to the different cultural constructs of a particular group, they become ethnographic and thus cultural resources as well. A major goal of ethnographic object collections is to facilitate collaborative relationships between the

NPS and the peoples whose customary ways of life affect, and are affected by, park resource management.

The composition of the MANZ ethnology collection is subject to change as traditionally associated peoples are identified. The park does not categorize or catalog objects associated with Japanese culture or traditions as "ethnology collections."

Ethnographic studies of the site and its resources will generate records including oral histories, journals, photographs, field notes, reports, and other documents associated with ethnographic fieldwork. Because of their documentary nature, these materials shall be included in the museum collection as archives and are described in section II.1.E this SOCS.

Ethnology Collection at MANZ

As of Fiscal Year 2024, MANZ has 10 Paiute and Shoshone baskets cataloged. MANZ also has a growing collection of affiliated Native American oral histories.

Consultation with the Owens Valley Paiute tribal community and other affiliated groups is required in regards to NAGPRA-related ethnographic material.

Current Representation: Paiute and Shoshone basketry and affiliated Native American oral histories.

Objects manufactured by ethnographic groups that have been collected using archeological techniques are categorized as "archeology collections," not ethnology. This includes material created by Japanese Americans, the Owens Valley Paiute, and others.

Mandated Acquisitions: There are no legal mandates for the Ethnology collection. Please refer to the Archives Resource Management Records section for guidance on records related to ethnographic studies.

Should be acquired: Only ethnographic materials directly associated with the site, such as objects owned or used by an individual or cultural group traditionally significant to the site mandate, should be considered. Preference will be given to objects associated with oral histories in the collection. Staff should carefully consider collections of non-original ethnographic resources which may be related to the existing museum collection or attributed to traditionally associated people of the site/site area.

May be acquired: See above.

Not to be acquired: Ethnographic materials from peoples who do not have direct traditional associations to the site. These objects will be directed to other museums.

C. History Collection

History collections reflect the spectrum of materials made and/or used during recorded times by humans residing in what today is the United States and its Territories. They include cultural

collections that are neither archeological nor ethnological. These collections document individual or community life; social, cultural, political, economic, and technological trends; and events associated with a park's mission, themes, and history. They also may include art, such as paintings and sculpture, and rare books.

Some history collections reflect activities of well-known individuals, others evidence everyday life and actions of working-class people. Documenting and interpreting historical objects to the public in the context of their original settings enhances the public's understanding. For more in-depth discussion of history collections, see [Museum Handbook II, Appendix G](#).

History Collection at MANZ

Historic objects are a key component of the MANZ museum collection. They provide for use in exhibits and in research of themes relevant to this historic site. As of Fiscal Year 2024, the Collections Management Report indicated there are 874 cataloged history objects and 933 history objects in the backlog to be cataloged.

Mandated Acquisitions: There are no legal mandates for the History Collection.

Should be acquired: Only historic material with a direct association to the site should be included in the museum collection. When a large quantity of an object type is available, priority should be given to acquiring the best-preserved examples.

The history collection is based on the site's themes used to establish the following collecting categories:

- a) **Manzanar War Relocation Center history:** Historic material specifically associated with the incarceration of Japanese Americans at Manzanar during World War II (from 1942 through 1945). This could include personal possessions, letters, photographs, art, crafts or decorations, furnishings, products made on-site, equipment and supplies, and other relevant objects associated with people incarcerated, Military Police, and War Relocation Authority (WRA) employees. This material would be the primary emphasis for the historical component of the museum collection (particularly as needed for exhibits) and in telling the stories of Manzanar. This category constitutes the majority of the historical collection of objects for the site.

Future collections activity in this area will concentrate on the acquisition of outstanding examples of objects currently not represented in the MANZ collection or in other JACS repositories, and that meet the criteria referenced above and clearly address a resource management, interpretive, or research deficiency noted in site documents, thus ensuring that the history collection is relevant to the needs of the site.

May be acquired:

- a) **Forced removal of Japanese Americans during World War II history:** As stated previously, items from other Japanese American Confinement Sites (JACS) may be considered for acceptance, only if the items cannot otherwise be accepted at their

associated JACS or non-NPS repository. Preference will be given to items with ties to existing MANZ collection materials. This decision must be made in coordination with other JACS staff, in addition to the MANZ Collections Advisory Committee and Superintendent (see IV.2. Roles and Responsibilities for Accessioning and Deaccessioning). This may include material that conveys the political, economic, legal, and social mechanisms culminating in the forced removal of Japanese Americans during World War II. This may also include objects associated with pre-war and post-war Japanese American history as it helps to tell the story of the effects forced removal had on these individuals. Objects may be considered for acquisition to the extent that they are needed for exhibit, to convey a primary interpretive theme documented for the site, or if they directly relate to the site's significance.

- b) **Pioneer settlement history:** A limited amount of historic material relating to the early pioneer settlement period of the Owens Valley through the development of the Manzanar planned irrigation community may be considered for inclusion in the collection. Such material would be directly from or related to the Manzanar town site and acquired for purpose of exhibit to convey this period of the site's history.
- c) **Water use history:** A limited amount of historic material relating to the history of water use at the Manzanar site may also be considered for acquisition, to the extent that it is needed for exhibit to convey this interpretive theme.
- d) **Memorials, plaques, and other commemorative objects:** Items that commemorate relevant events or peoples may be considered for acquisition. Items originally intended as in-situ, (original) elements of the cultural landscape and have been removed, may also be placed into the museum collection if they support interpretive themes.
- e) **Historic fabric:** Representative samples of original fabric removed from remaining structures may be included in the collection. Decisions concerning what part of the removed fabric should be a joint decision between the Cultural Resource Management Specialist for the site and the specialist supervising the project.
- f) **Cemetery and memorial offerings:** The Cemetery Collection Management Plan (2025) addresses this complex issue. This document sets out clear guidelines on items to be retained, conveyed, or "benignly neglected".

Books that are extremely rare or have a direct associative value to the site may be acquired into the site's museum collection; however, most books including those perceived as old, rare, or valuable, should be placed in the MANZ library. Rare books, if collected for rarity, should be placed in the park library.

Not to be acquired: Objects that duplicate current MANZ holdings; objects in such poor condition that they are beyond conservation; objects that are inherently unstable, which causes the item to deteriorate or destroy itself; potentially hazardous materials (see Appendix F. Hazards in the Collection for more information). Every effort should be made not to accept historic material that is duplicative of existing collections at other NPS JAC sites.

- a) **Owens Valley Paiute:** With the exception of archeological and ethnology collections directly related to the site, which are addressed in Sections A and B, historic material associated with the Owens Valley Paiute will generally not be considered for acquisition. Donations of historic material will be directed to the Eastern California Museum.
- b) **Contemporary artwork and exhibit material:** Artwork and other objects acquired for office decoration and/or exhibit media should not be considered for inclusion into the museum collections. Furthermore, D0-28, Cultural Resource Management Guideline, states, "Museum property does not include those items necessary to display a collection (e.g., exhibit cases, dioramas, special lighting, and graphics) "
- c) **Tertiary material:** Artifacts associated with Owens Valley history, other than those listed above, will not be considered for acquisition, Examples of these include: early explorations and government surveys; mining history; travel and tourism.
- d) **Constitutional and human rights:** Material broadly associated with the denial of rights and freedoms of American citizens guaranteed to them by the United States Constitution should no longer be collected. To convey these concepts in exhibits, materials can be acquired through loans rather than accession.
- e) Japanese items that are not related to the site or interpretive themes.
- f) Items which can be housed by another Japanese American Confinement Site. Cross-collection should be avoided.

D. Art Collection

Art collections generally consist of paintings, drawings, prints, and sculptures admired and appreciated primarily or solely for aesthetic or intellectual content. Although created primarily for utilitarian or decorative purposes rather than aesthetics, the artistry and skill of many folk artists is now recognized, and folk art is sometimes considered within art collections. Although most artists in parks work independently, the NPS may commission artists to create works of art inspired by a specific park or resource.

Art Collection at MANZ

As of Fiscal Year 2024, the Museum Collections Management Report indicated there are 149 cataloged art objects and no art objects in the backlog to be cataloged.

Mandated acquisitions: There are no legal mandates for the art collection.

Should be acquired: Historic artwork, models and dioramas should be considered for acquisition if they were used or created at the Manzanar War Relocation Center or are otherwise directly associated with the site.

May be acquired: Historic artwork, models, and dioramas that were created pre-war, post-war, or created at another relocation center or related facility, that depict the Manzanar War Relocation

Center may be considered for acquisition. These items can be considered for inclusion in the museum collection if they provide context and support the interpretive themes for the site.

Not to be acquired: Art with no connection to Manzanar. Art with undocumented provenance and no clear title; “office art” or reproductions (posters, prints, and similar mass-produced copies); artwork with no direct association of past ownership, subject, or artist, to the site.

NOTE: the NPS Commissioned Art Collection is not managed as a museum collection, but as Federal Property.

Objects in such poor condition that they are beyond conservation. Objects that are inherently unstable which causes them to deteriorate or destroy themselves.

E. Archives Collections

For the NPS, the term “archives” or “archival collections” refers to permanently valuable documents or records providing information about a place, institution, or group of people.

From the [Museum Handbook I, CH 1, pg. 11](#):

Other than resource management records, Federal records should not be included in the museum collection without specific authorization from the National Archives and Records Administration (NARA). These records are the original or “record copy” documents created or received in the course of performing the daily work of the NPS. Examples of records that do not belong in the museum collection include audit records, budget materials, central files, contracting files, financial records, law enforcement records, legal records, museum and project administrative records, permits, personnel records, and superintendent’s correspondence files.

As of Fiscal Year 2024, the Museum Collections Management Report indicated there are 53,813 cataloged archives objects and 54,772 archives objects in the backlog to be cataloged. These archives make up the largest portion of the MANZ museum collections.

Manuscript Collections at MANZ

The term “manuscripts” commonly refers to single documents or collections of documents created by organizations (“organizational records”), businesses (“corporate archives”), and individuals or families (“personal papers”). In NPS museum collections, manuscript collections are primarily donated by individuals, organizations, or families and may include letters between family members, ledgers from family businesses, diaries, oral and video histories, scrapbooks, and photographs documenting the family’s history.

Manuscript collections, or donated collections, are not “park Federal records” and should always be maintained and cataloged separately from resource management record collections. They are not subject to the Federal Records Act (FRA), Freedom of Information Act (FOIA), or other laws governing federal records access. Donated collections may be protected by copyright or other restrictions, and the NPS may hold copyrights for donated materials.

Records that are managed by NPS museum collections staff include:

Non-Official Records: These records are the site's museum archival and manuscript collections and are essential for the ongoing work of MANZ architects, archeologists, curators, historians, interpreters, landscape architects, scientists, and other scholars and staff. The collection provides evidence of park-related historic and scientific activities, events, resources, cooperating associations, and individuals. They also illustrate the evolution of the site from its historic period to the present. The site's archives also provide essential historical detail for exhibits, films, publications, reports and studies. Such materials are critical to understanding and managing the site's cultural and natural resources.

Mandated Acquisitions: There are no legal mandates for manuscript collections.

Should be acquired: Manuscript collections under the following categories should be acquired:

- a) **Personal Papers:** This category may be represented by personal or family papers, memorabilia, correspondence, photos, and other material. The primary emphasis for such acquisitions should remain with archival material that directly relates to the relocation center at Manzanar during World War II.
- b) **Organizational Records:** This category may be represented by records such as those associated with the Manzanar Committee and other related groups. This category is also represented by those records associated with groups who expressed anti-Asian sentiments or groups who were opposed to the establishment of MANZ.
- c) **Assembled Manuscript and Archival Collections:** This category may include but is not limited to materials such as the photographic images created by Toyo Miyatake or Ansel Adams and the papers of Ralph Merritt. Collections may also include subject files transferred from the MANZ library. The primary emphasis for such acquisitions should be archival material that directly relates to the Manzanar War Relocation Center during World War II.
- d) **Oral histories:** Oral histories collected by MANZ staff are considered field collections and will be added to the museum collection. Oral histories offered for donation (i.e. not collected by staff) will go through Collections Advisory Committee review (see IV.2. Roles and Responsibilities for Accessioning and Deaccessioning).

May be Acquired:

- a) **Personal Papers:** This category may be represented by personal or family papers, memorabilia, correspondence, photos, and other material. These may be archival material from other relocation centers or facilities, and from pre- and post-war, as needed in support of interpretive goals.
- b) **Assembled Manuscript and Archival Collections:** In rare and extenuating circumstances, this category may include archival material from other relocation centers if collections cannot otherwise be accepted at their associated JACS or non-NPS repository. Preference will be given to items with ties to existing collection materials. This decision must be made in coordination with other JACS staff, in addition to the

MANZ Collections Advisory Committee and Superintendent (see IV.2. Roles and Responsibilities for Accessioning and Deaccessioning). This category may also include collections from pre- and post-war, as needed in support of other interpretive goals.

Not to be acquired: Photocopies or scans of diaries, letters, historic photos, etc. from personal collections or other repositories are more appropriately library “vertical files” or interpretive use collections and will not be acquired for the museum collection. General “family vacation” images from members of the public and employee personal photos unrelated to the site will not be acquired. Digital copies of analog photos or documents already in the collection created for access and use will not be added to the museum archives. War Relocation Authority and other government agency records that are available in the National Archives will not be acquired unless they have been uniquely modified.

In addition, non-resource related permanent records should not be accessioned into the museum collection. Guidance on this subject has differed over the years. Museum staff will no longer maintain permanent records from divisions other than Resources.

Library Material vs. Museum Collection Archives: Books and other library materials used in exhibits or as furnishings in historic structures, as well as rare publications retained for their physical properties or their associative value, shall be managed as part of the site’s museum collection. Library materials are not managed as part of the site’s museum collection. Policy and procedures for library materials are outlined in NPS Management Policies (2001), Chapter 5, and DO-28, Cultural Resource Management Guideline.

b. Resource Management Records in the Archival Collections at MANZ

Resource Management Records (RMR) document the management of natural and cultural resources, and park lands which must be [preserved in perpetuity](#). Using professional discretion, knowledge of park resource management, and working with an NPS archivist (park, regional office, WASO), determine how they support the management of the resources, and if they are active records.

Associated records are Resource Management Records that document and provide context for museum objects, specimens, and samples. Some associated records are specifically mandated by laws and regulations that govern how we manage archeological, biological, and paleontological collections.

For archeology: [Archaeological Resources Protection Act](#) (ARPA), specific reference to retention of associated records found here: [US Code Title 16, 470cc](#). And [36 CFR 79](#) which are regulations associated with undertakings associated with the Antiquities Act, Reservoir Salvage Act, the National Historic Preservation Act, and ARPA.

For biology: [Management Policies 2006 \(nps.gov\)](#) and [36 CFR 2.5](#)

For paleontology: [16 USC 470aaa-1: Management \(house.gov\)](#)

Resource Management Records (RMR) are federal records subject to the Federal Records Act (FRA), Freedom of Information Act (FOIA), or other laws governing federal records access. Although records created by government employees are in the public domain, records within the park archives created by others may be subject to copyright or other legal restrictions. A compelling reason would be needed to accept copyrighted formats.

Mandated Collections: Records associated with collections made through permitted activities associated with ARPA, and Paleontology Resources Preservation Act of 2009 (PRPA) are mandated by these laws to be retained.

Should be Acquired: Resource management and lands records should be acquired regardless of format.

May be Acquired: The *NPS Service-wide Record Schedule* (SRS) and the NPS *Records and Electronic Information Management (REIM Guide)* identify additional records that have enduring value to both the NPS and NARA. These records are not RMR or archives, but a very small set of park records related to protection and safety, wildfire management, and park facilities management.

Not to be Acquired: Museum records including but not limited to accession book, accession files, catalog records and databases, catalog folders, annual inventories, images/scans documenting objects/specimens, and object conservation condition and treatment reports must be permanently retained in association with museum collections, but are not cataloged or managed as part of the MANZ museum collection. These records are currently located at DEVA and are managed by the DEVA Curator (MANZ Curator-of-Record).

2. Natural History Collection

Except for mandated collections, MANZ will not collect/maintain a natural history collection for its own purpose. Current and future representations include plant and animal voucher specimens, collected under NPS permit, through the NPS Inventory and Monitoring Program. As of Fiscal Year 2024, the Museum Collections Management Report states that there are 21 objects cataloged in the biology collection with no backlog, and no objects in geology or paleontology.

Future growth of the collection is restricted to specimens and associated records generated through authorized, systematic scholarly research and selective acquisition based on:

- Needs identified in MANZ's enabling legislation or presidential declaration, approved planning documents and resource studies.
- Service-wide initiatives.
- Interpretive needs identified in planning documents.
- Enhancing the understanding of, and promoting increased stewardship of, the site's natural resources.
- Natural resource baselines, inventorying, and monitoring activities.
- Regulatory and compliance activities such as those mandated by the National Environmental Policy Act of 1970.

All collecting activities must be in compliance with [36 CFR 2.5](#), [the Research Permitting and Reporting System \(RPRS\)](#), NPS Management Policies (2006, section 4.2.3), *Director's Order #77: Natural Resource Protection* (under development), and *NPS Natural Resources Management Guideline* (1991). Please see Appendix G: Permits for more information.

Uncontrolled surface collecting by visitors or site staff is illegal according to the *Code of Federal Regulations, Title 36, Volume I* (36 CFR 2.1). Specimens found on the surface should not be removed from their original location by the finder; they should be reported to site staff delegated with museum collection responsibilities. If materials are turned in to the site, standard NPS policies and procedures must be followed to ensure that the finder collects no more material, the precise provenience information is recorded, if possible, and the subject specimens and data are delivered promptly to the site. Unless the items are determined to be significant by a subject-matter expert in the respective discipline (biology, geology, or paleontology), they should not be cataloged into the site's museum collection.

Natural resource specimens collected outside site boundaries will not be managed as museum property unless mandated.

MANZ acquires natural history collections through internal NPS projects and outside permitted research projects conducted by researchers within site boundaries. Collections associated with research permits are accessioned and cataloged. NPS projects conducted without a research permit are subject to the same laws and policies as those with a permit.

Acquisitions and future growth of MANZ's natural history collection are initiated by site staff or outside researchers and will be restricted to specimens and associated records divided into three disciplines: biology, geology, and paleontology. Currently, MANZ has only biology collections. Any future collection must be RPRS permitted activity.

A. Biology Collection

Museum collections serve as the verifiable and reproducible evidence of a scientific study. Therefore, their collection and long-term preservation is a crucial aspect of ensuring scientific integrity.

Biological resources are plants and animals which live within, migrate through, or otherwise make use of a park. These include all species belonging to all five of the commonly recognized kingdoms of living things, such as flowering plants, ferns, mosses, lichens, algae, bacteria, mammals, birds, reptiles, amphibians, fishes, insects, worms, crustaceans, and microscopic plants and animals. These biological resources can be either native or exotic.

Biological collections include specimens (or parts thereof) from plants and animals and their associated records. Copies of records created during biological research are retained, at the discretion of the park, as part of the museum collection, regardless of specimen collection. These collections document the non-human biology of the park at a given time and place. When

researchers make observations about the park environment, they often collect voucher specimens to testify to their observations. If these specimens are not destroyed or consumed in analysis, they may become part of the park's museum collection as determined during the permitting process. The NPS has an ongoing program to inventory and monitor living resources in the park that generates many specimens for the museum collections. Over time, NPS biological collections can help document changes in the park environment and changes in species, thus helping to inform park planning, natural resource management, cultural landscape management, and interpretive programs.

Examples of biological collections may include:

- Animal skins
- Skeletal material
- DNA samples and other viable samples (blood)
- Tissue samples
- Marine and freshwater shells
- Pinned insects
- Pressed plants
- Tree cores
- Casts of animal tracks
- Specimens or other collected material that results in derivatives that may be patentable or otherwise protected under the intellectual property (IP) laws.

Biological Resources at MANZ

MANZ has diverse biological resources and much remains to be learned about lesser studied taxa and habitats within the site, as well as impacts of anthropogenic and natural processes.

As of Fiscal Year 2024, the Museum Collections Management Report states that there are 21 objects cataloged in the biology collection.

Mandated acquisitions: Specimens and samples obtained for preservation during inventory, monitoring, research, and study projects, together with associated records, must be acquired. Collecting of animal specimens will be associated with needs identified in the Resource Management Plan/Resource Stewardship Strategy or approved I&M plans, or as needed to voucher research projects. All approved study plans will limit collected specimens to what has been determined as a sufficient number of examples. Threatened and endangered (T&E) specimens should not be added unless (1) accidental death occurs or (2) if researchers comply with all legal restrictions regarding protected species, including all Federal, State, and other permitting requirements for all proposed collections.

Should be Acquired: N/A

May be Acquired: N/A

Not to be acquired: Biological specimens collected outside the site's boundaries will not be accessioned into the museum collection. Scientific specimens lacking provenience documentation, lacking scientific value, in poor condition or which were not prepared to professional standards, and species for which the MANZ museum collection already has a representative sample are not to be acquired. Specimens specifically collected as a type or reference collection, e.g., for fire management programs that are used in the field, heavily used, etc., are not to be collected. Living specimens are not to be acquired for the museum collection. Nor is ICMS or its successor to be used to inventory or document living collections.

III. PARK MUSEUM COLLECTIONS SUBJECT TO THE NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT OF 1990 (NAGPRA)

The Native American Graves Protection and Repatriation Act of 1990 (25 USC 3001-13) and implementing regulations (43 CFR Part 10), requires Federal agencies and institutions that receive Federal funding (including museums, universities, state agencies, and local governments) to protect and repatriate Native American human remains and cultural items to lineal descendants, Indian Tribes, and Native Hawaiian organizations. Items in the possession or control of the NPS identified as subject to NAGPRA must be addressed in accordance with 43 CFR 10. The regulations require:

- Consultation with deference given to the Native American traditional knowledge of lineal descendants, Indian Tribes, and Native Hawaiian organizations;
- Address disposition of any newly discovered Native American human remains or cultural items removed from federal lands and any Native American human remains and cultural items in NPS possession or control removed from federal lands after the enactment of NAGPRA on November 16, 1990 in accordance with 43 CFR 10.7;
- Identification of all Native American human remains and cultural items in NPS possession or control removed from federal lands prior to the enactment of NAGPRA;
- Development of NAGPRA inventories or summaries in compliance with 43 CFR 10.9 and 10.10 to facilitate consultation and eventual repatriation of Native American human remains and cultural items removed from federal lands prior to the enactment of NAGPRA.

NPS policy and guidance for NAGPRA compliance can be found on the NPS NAGPRA Guidance SharePoint where more detailed information is available to address the following:

- Duty of Care (43 CFR 10.1(d)) which requires the NPS to care for, safeguard, and preserve human remains and cultural items in its custody, possession, or control;
- Steps to complete disposition of human remains and cultural items removed from federal lands after the enactment of NAGPRA (43 CFR 10.4 through 10.7);
- Steps to complete summaries and repatriation of unassociated funerary objects, sacred objects, and objects of cultural patrimony removed from federal lands prior to the enactment of NAGPRA (43 CFR 10.9);
- Steps to complete inventories and repatriation of Native American human remains and associated funerary objects removed from federal lands prior to the enactment of NAGPRA (43 CFR 10.10);

- Consultation with lineal descendants, Indian Tribes, and Native Hawaiian organizations;
- Determining cultural affiliation (43 CFR 10.3);
- Developing and publishing a Notice of Intended Disposition (NID) - 43 CFR 10.7(c)(2), a Notice of Intended Repatriation (NIR) - 43 CFR 10.9(f), and a Notice of Inventory Completion (NIC) - 43 CFR 10.10(e);
- Evaluating requests for repatriation (43 CFR 10.9(d) and 10.10(f)) or claims for disposition (43 CFR 10.7(c)(3)) of human remains and cultural item; and
- Developing and maintaining a record of consultation.

The 1993 NPS NAGPRA inventory and summary stated there were no objects/remains subject to NAGPRA located in the MANZ museum collection. The current MANZ Cultural Resource Manager has relayed that any remains uncovered at MANZ since 1993 have been reburied. Staff should re-evaluate the MANZ collection for objects that may be considered Objects of Cultural Patrimony or Unassociated Funerary Objects under current understandings of NAGPRA, and consult with the relevant tribes.

Any newly discovered human remains and/or NAGPRA cultural items removed from park lands should not be accessioned into the museum collection. Rather, disposition should be addressed through compliance with sections 10.4 through 10.7 of 43 CFR 10 in accordance with the mandated timelines found in 43 CFR 10.

IV. ACQUISITIONS

1. Acquisition Criteria

Acquisition of museum objects is governed by the site's ability to manage and preserve materials according to *NPS Management Policies, Chapter 5* (2006), the standards for managing museum objects in *NPS-28: Cultural Resources Management Guideline* (1998); *the NPS Checklist for Preservation and Protection of Museum Collections (Checklist)*; and the *NPS Museum Handbook I-III*.

MANZ continues to acquire objects that relate to the site through donation, purchase, exchange, transfer, field collection, and loan.

In accordance with NPS policy and general museum practice, only unrestricted gifts should be accepted. Only the regional director can allow an exception to this rule. Gifts or bequests must be free of restrictions as to their use and future disposition. However, museum collections are subject to legal restrictions, such as privacy laws and classified data. Refer to the MH-III, Chapter 2: Legal Issues, for information on use and access restrictions.

Museum objects must be acquired, accessioned, and cataloged in accordance with the *NPS Museum Handbook, Part II* (2000).

Firearms and ammunition, acquired for museum exhibits and research purposes, are not intended for use as operational firearms. The NPS standards for managing, use, and disposal of museum objects are outlined in the *NPS Museum Handbook Parts I and II*, and *NPS-28, Cultural*

Resources Management Guideline, as well as the Draft Appendix X: Museum Firearms, Small Arms Ammunition, Artillery, And Munitions (still under review).

2. Roles and Responsibilities for Accessioning and Deaccessioning

Accountable Officer

The site's Superintendent, by delegation, represents the Director of the National Park Service and the Secretary of the Interior in accepting title to and responsibility for all museum objects. The Superintendent bears the ultimate responsibility for the acquisition, proper care, and management of the unit's museum collection. The Superintendent has delegated the day-to-day care of the collection to the custodial officer for museum collections. This designation must be made in writing.

All permanent acquisitions must receive formal approval from the site's Superintendent before they can be accepted into the museum collection. Before physical receipt of the acquisition, all paperwork, including the Deed of Gift, must be signed by both the site and the donor. Upon receipt, all newly acquired objects and related documentation must be turned over to the Receiving Officer. The Curator, or Custodial Officer, prepares, for the Superintendent's signature, all instruments of conveyance, and letters of thanks, acceptance, or rejection, and transmits them as appropriate to the donor, lender, vendor, or other sources of acquisition.

The Superintendent, as the accountable officer, also must approve all incoming loans, which are considered temporary acquisitions, and is the final signatory for all loan documentation.

Custodial Officer

The custodial officer is directly accountable and responsible for the physical care and documentation of the museum collection. The custodial officer, usually the curator or other museum staff (including collateral duty), provides oversight of the museum collection, as delegated by the Accountable Officer. In the absence of those positions, it may be assigned as a collateral duty to an employee in a different job series.

The DEVA Museum Curator is the Custodial Officer for MANZ collections.

Designated Receiving Officer

The Superintendent appoints, in writing, the Receiving Officer for the museum collection.

The Receiving Officer is responsible for documenting the receipt of museum collections. The Receiving Officer can be one of the museum staff or a staff member from another program/division.

The Receiving Officer signs the Accession Receiving Report (Form 10-95), the Receipt for Property (DI-105), and any other receipts for museum property. The Custodial Officer cannot serve as the Receiving Officer, nor can the Superintendent.

Ed Standefer, MANZ Interpretation Manager, was established as Designated Receiving Officer in 2025.

Collections Advisory Committee

The Collections Advisory Committee (CAC) reviews the appropriateness of the proposed accession or deaccession and its disposition.

Since 2017, all parks are required to establish a CAC. A CAC is required to review all proposed new accessions other than scientifically generated archeological and natural history field collections and their associated records from NPS-administered land. The CAC should also review any miscellaneous items “found in collection.” See *Museum Handbook*, Part II, Chapter 2 for types of accessions and their definitions.

Park-specific CACs shall be established based on the guidelines for deaccessioning committees in the [Museum Handbook, Part II, Chapter 6](#) and [Appendix B](#). The CAC must include at least one member at the GS-1015-11 grade or higher, must include at least three members, and must make recommendations in writing.

A Collections Advisory Committee was established for MANZ in 2023 and comprises the following individuals:

Jeffery Burton, Cultural Resources Program Manager, MANZ
Sarah Bone, Park Ranger and Museum Program Liaison, MANZ
Sarah Saxe, Museum Curator, DEVA

V. MANAGEMENT ACTIONS

Acquisition and deaccession decisions are guided by NPS *Museum Handbook* mandates, strategic collecting directions outlined in this SOCS, and the following management actions:

This Scope of Collection Statement must be reviewed every five years and, when necessary, be revised to remain supportive of and consistent with any changes in the site’s mission or needs. In addition, any revisions must be reviewed and approved by the MANZ Superintendent.

MANZ collections are currently stored at two off-site locations: Death Valley National Park, Death Valley, CA and Western Archeological Conservation Center, Tucson, AZ.

Appendix A: Enabling Legislation

Manzanar National Historic Site was established by P.L. 102-248, H.R. 543, on March 3, 1992. Please see the Manzanar National Historic Site website [Enabling Legislation](#) or GovInfo [Japanese American National Historic Landmark Theme Study Act](#).

Appendix B: NPS Museum Collections

The Department of Interior defines a museum collection as a subset of personal property that is retained for long-term preservation, study, and interpretation consistent with statutory requirements and its relationship to the mission of the respective bureau and park. The NPS affirmed its mandate to actively acquire and preserve objects, specimens, and archives in *NPS*

Management Policies (2006, section 5.3.5.5), stating that “The Service will collect, protect, preserve, provide access to, and use objects, specimens, and archival and manuscript collections . . . in the disciplines of archeology, ethnography, history, biology, geology, and paleontology to aid understanding among park visitors, and to advance knowledge in the humanities and sciences.”

Parks acquire and manage museum collections because they are:

important park resources in their own right 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 (NPS-28 *Cultural Resource Management Guideline*, 1998: 137).

Because of their significance, NPS *Management Policies* (2006, section 1.4.6) includes museum collections among the park resources and values which are subject to the no-impairment standard. Impairment (pg. 11)

[NPS Management Policies \(2006, section 1.4.6, pg. 11\)](#)

1.4.6 What Constitutes Park Resources and Values

- The “park resources and values” that are subject to the no-impairment standard include + the park’s scenery, natural and historic objects, and wildlife, and the processes and conditions that sustain them, including, to the extent present in the park: the ecological, biological, and physical processes that created the park and continue to act upon it; scenic features; natural visibility, both in daytime and at night; natural landscapes; natural soundscapes and smells; water and air resources; soils; geological resources; paleontological resources; archeological resources; cultural landscapes; ethnographic resources; historic and prehistoric sites, structures, and objects; museum collections; and native plants and animals;
- appropriate opportunities to experience enjoyment of the above resources, to the extent that can be done without impairing them;
- the park’s role in contributing to the national dignity, the high public value and integrity, and the superlative environmental quality of the national park system, and the benefit and inspiration provided to the American people by the national park system; and
- any additional attributes encompassed by the specific values and purposes for which the park was established. (See introduction to chapter 4)

Appendix C: Legislation Related to NPS Museum Collection and Other Related Conventions, Laws, and Regulations

These laws provide the legal mandates for NPS management of museum collections:

- 16 USC
 - 469-469c: Reservoir Salvage Act of 1960, as amended
 - 470aa-mm: Archeological Resources Protection Act of 1979
 - 470aaa: Paleontology Resources Preservation Act of 2009
 - 668a Bald Eagle Protection Act of 1940, as amended
 - 703-711 Migratory Bird Treaty Act of 1918
 - 1361-1407 Marine Mammal Protection Act of 1972
 - 1531-1543 Endangered Species Act of 1973, as amended
- 18 USC 43-44 Lacey Act of 1900 [The Black Bass Act of 1930 (16 USC 851) added fish to the list of wildlife under the Lacey Act]
- 25 USC 3001-3013 Native American Graves Protection and Repatriation Act of 1990
- 41 USC 102-41 Subpart C Voluntarily Abandoned Property
- 42 USC 1996 American Indian Religious Freedom Act of 1978
- 54 USC
 - 100101: Promotion and Regulation
 - 100301-100302: Establishment (Organic Act of 1916)
 - 100701 et seq.: System Resource Inventory and Management (National Parks Omnibus Management Act of 1988)
 - 102501-102504: Museums (Museum Properties Management Act of 1955)
 - 300101 et seq: Historic Preservation (National Historic Preservation Act of 1966)
 - 312501-312507: Preservation of Historical and Archeological Data (Archeological and Historic Preservation Act of 1974)
 - 320301-320303: Monuments, Ruins, Site, and Objects of Antiquity (The Antiquities Act)
 - 321010-320106: American Antiquities [Policy and Administrative Provisions], (Historic Sites Act of 1935)

The following regulations include major requirements for NPS museum collections management.

- Copyright Act of 1976 (17 USC 101 et seq. [1988 & Supp. V 1993])
- Curation of Federally Owned and Administered Archeological Collections” (36 CFR Part 79) and in something about the update for deaccessioning
- Disposition of Federal Records (36 CFR 1228)
- Disposal of Records (44 USC 33)
- Endangered and Threatened Wildlife and Plants (50 CFR, Sections 17.11 and 17.12)
- Federal Property and Administrative Services Act of 1949, as amended (40 USC 483[b])
- Federal Records Act of 1950, as amended (44 USC 3101 et seq.)
- Freedom of Information Act of 1966, as amended (5 USC 552)
- Native American Graves Protection and Repatriation Regulations (43 CFR 10)
- Preservation, Arrangement, Duplication, Exhibition of Records (44 USC 2109)
- Preservation of American Antiquities (43 CFR Part 3)

- Privacy Act of 1974 (5 USC 552a)
- Protection of Archeological Resources (43 CFR Part 7)
- Research Specimens (36 CFR, Section 2.5)
- Abandoned Shipwreck Act of 1987 (43 USC 2101 through 2106)
- Animal Welfare Act of 1966 (7 USC 2131 through 2159)
- Copies of records, documents, etc.: charges, disposition of receipts (43 USC 1460)
- Commercial filming activities on federal land (Public Law 106-206)
- Department of the Interior Fish and Wildlife Policy: State-Federal Relationships (43 CFR 24)
- Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by Federal Agencies were published in the Federal Register as 67 FR 5365
- Federal Cave Resources Protection Act of 1988 (16 USC 63)
- Federal Land Policy and Management Act of 1976 (43 USC 35)
- Federal Technology Transfer Act of 2012 (15 USC 3710)
- Information Quality Act (passed in section 515 of the Treasury and General Government Appropriations Act for Fiscal Year 2001 (Public Law 106-554; H.R. 5658)
- National Archives and Records Administration Act of 1984 (44 USC 21)
- Omnibus Consolidated Appropriations Act of 1997 (Public Law 104-208)
- Permits (36 CFR 1.6)
- Preservation of Natural, Cultural, and Archeological Resources (36 CFR 2.1)
- Presidential and Federal Records Act Amendments of 2014 (Public Law 113-187; H.R. 1233)

Presidential memoranda pertinent to museum and archival collections include: Presidential memoranda pertinent to museum and archival collections include

- Memorandum on Preserving Scientific Integrity in Government Decision-Making (2009) and the Presidential Memorandum on Managing Government Records (2011)
- “Technical Edits” for 36 CFR were published in the Federal Register as 80 FR 36474, effective as of on June 25, 2015

The following international conventions apply to NPS cultural collections:

- 1970 UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property (implemented in the United States by P.L. 97-446 in 1983, 19 USC 2601)
- 1983 Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

The following governmentwide and departmental policies and standards apply to NPS museum collections:

- 41 CFR 101 Federal Property Management Regulations (FPMR)
- Departmental Manual Part 11, Museum Property Management, Chapters 1-3
- Departmental Manual Part 517, Chapter 1, Pesticide Use Policy

- Interior Property Management Regulations, Departmental Manual Part 410, Personal Property Management (Subpart 114-60)

Excerpts from NPS Management Policies (1988) that are specifically relevant to museum objects are as follows:

- Chapter 4 - Natural Resource Management
 - Natural Resource Collections (Page 4:4)
 - Integrated Pest Management Procedures (Page 4:13)
 - Paleontologic Resource Management (Page 4:19)
- Chapter 5 - Cultural Resource Management
 - Inventories (Page 5:1)
 - Preservation of Data and Collections and Protection of Research Potential (Page 5:3)
 - Treatment of Museum Objects (Pages 5:9-10)
 - Acquisition, Management, and Disposition of Museum Objects (Page 5:10)
 - Historic Furnishings (Page 5:10)
 - Archives and Manuscripts (Pages 5:10-11)
 - Fire Detection and Suppression (Page 5:14)
 - Pest Management (Page 5:14)
- Chapter 7 - Interpretation and Education: Interpretation and Native Americans (Page 7:5)
- Chapter 8 - Use of the Parks: Research and Collection Activities (Pages 8:15-16)
- Chapter 9 - Park Facilities: Curatorial Facilities (Page 9:15)
- Chapter 10 - Concessions Management: Merchandise and Handcrafts (Pages 10:8-9)

Director's Orders (DO) supplement the NPS Management Policies. The following DO include guidance for museum collections

- Director's Order #11D: Records Management
- Director's Order #24: NPS Museum Collections Management
- Director's Order #28: Cultural Resource Management
- Director's Order #44: Personal Property Management
- Director's Order #77: Natural Resource Protection
- Director's Order #77-10: NPS Benefits Sharing
- Director's Order #79: Integrity of Scientific and Scholarly Activities

For a more detailed description of legislation and regulations as related to NPS museum collections, please see [Museum Handbook, Part I, Appendix A: Mandates and Standards for NPS Museum Collections](#).

Appendix D: Uses and Restrictions of Museum Collections

A. General Use

The site's museum collections may be used for exhibits, interpretive programs, research, and other interpretive media such as publications. The governing consideration on the use of museum objects is the conservation of each object in question and of the park's collection:

- All exhibits or displays containing museum objects must have proper security and appropriate environmental controls to ensure their long-term preservation.
- Social Media posts must follow the guidelines outlined in *Director's Order* #70.
- Objects and records will be available for research purposes consistent with the preservation of the collection, subject to the guidelines outlined in *Director's Order* #28 (1998) and *Director's Order* #24 (2008).
- No use of the museum collection will be permitted without a curatorial staff member present. Prior arrangements must be made to examine museum collection materials. Non-NPS researchers who wish to use the collection must complete an application form, which will be reviewed by MANZ curatorial staff.
- Museum objects are prohibited from being used in living history demonstrations. For more information regarding museum collection use in demonstrations, see [Museum Handbook, Part III, Chapter 6](#). Exhibits may be incorporated into programs through organized tours or other non-consumptive techniques.
- Requests for consumptive analysis or testing of museum materials will comply with restrictions and procedures outlined in *Director's Order* #28 (1998) and the [Museum Handbook, Part II, Chapter 4](#).
- Requests for monetary and/or non-monetary benefits sharing stemming from research results derived from NPS-permitted research including progeny and unmodified derivatives of collected specimens, museum specimens, living collections, and multiple generations thereof, i.e. *Material*, will comply with [Director's Order #77-10](#) (2013) and [NPS Benefits-Sharing Handbook](#) (2018).

With appropriate authorization, documentation, and tracking, collected specimens may be used in the laboratory to create *Material*. The Collected Specimen Transfer Agreement (CSTA) authorizes the movement of collected specimens when a determination has not been made regarding final disposition. The Material Transfer Agreement (MTA) authorizes the movement of material that a researcher has created in a laboratory, and the loan agreement authorizes the movement of permanently retained museum specimens or living collection items.

Parks must use research permits, CSTAs, cataloging records, loan agreements, and MTAs, as applicable, to track collected specimens, museum specimens, and material. Tracking collected specimens, museum specimens, and material is critical to monitoring commercial use of research results and eventual benefits sharing.

- Objects may be loaned to qualified institutions for exhibition or research use in keeping with the conditions cited in “Conditions for Outgoing Loans (Form 10-137A)”. No loans are made to individuals. Institutions must be able to adequately care for the loan and the borrowing institution must complete a facility report to determine the risk of lending an object. A standard facility report can be purchased from the American Alliance of Museums. A condition report (Form 10-637) along with photographs of the loan shall be completed by collections staff before it leaves NPS custody. Sensitive materials may require additional conditions prior to a loan commitment. Expenses related to the loan of museum collection objects, including shipping and insurance, will be assumed by the borrower.

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 NAGPRA, unless such use is approved by the culturally affiliated group(s) in addition to the regional director or director as described in NPS-28, Cultural Resource Management Guidelines. Exhibition of Native American skeletal or mummified human remains or photos or replicas of them are specifically prohibited.

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, conservators, and regional curators must be included in the development and review of EDPs. Indigenous groups associated with archeological and ethnographic objects will be consulted about their use in exhibits. (The NPS *Museum Handbook*, Part III provides guidance on the exhibit plan and design.)

Any and all uses of materials from the MANZ museum collection will be consistent with the preservation standards set out in *Director’s Order #28: Guideline for Cultural Resources Management* (1998). Any consumptive or destructive use of museum objects must be approved by the Regional Director.

B. Commercial Uses

1. Filming & Photography

Filming and photography that will subject collections to unacceptable light levels, heat buildup, deterioration or possible breakage or theft shall not be permitted. Items subject to copyright and privacy shall have all appropriate releases obtained before filming or photography is permitted. Traditionally affiliated groups shall be consulted to determine whether filming or photography would have an adverse impact on them before permitting use of museum collections.

On January 22, 2021, the United States District Court for the District of Columbia issued an order in *Price v. Barr*. The decision declared the provisions applying to commercial filming under 54 U.S.C. 100905, 43 C.F.R. Part 5, and 36 CFR 5. are unconstitutional under the First Amendment. The National Park Service is working with Department of Interior solicitors and the

Department of Justice attorneys to determine the ramifications of the decision and how this decision will be implemented.

Until further instructions are provided, the implementation and enforcement of the commercial filming portions of 43 CFR part 5 including: 1) accepting applications and issuing permits for commercial filming; 2) enforcing the terms and conditions of permits or issuing citations and 3) collecting cost recovery and location fees for commercial filming activities will cease.

If filming activities in your park that would have previously been managed under a commercial filming permit could potentially impact park resources or the visitor experience, please reach out to the NPS Special Park Uses WASO program manager for further assistance. We anticipate issuing additional guidance about how parks can manage filming activities in a manner that complies with the court order. If you have questions, please contact the NPS Special Park Uses WASO program manager at 202-513-7092.

2. Reproduction of Museum Objects for Profit

Only the Superintendent can authorize reproduction of a museum object, archive, or specimens. A park can enter into agreements with a cooperating association to reproduce museum collections as sales items. Parks can also enter into a reproduction agreement with contractors or other organizations to reproduce a museum object for sale or distribution. All reproductions of NPS museum objects must carry a reproduction mark, NPS credit, and interpretive label.

For detailed information regarding factors to evaluate when considering a reproduction request, legal issues, information about reproduction agreements, and other issues, see the NPS [Museum Handbook, Part III: Museum Collections Use](#). Additional information is provided in DO-21: Donations and Fundraising, DO-32: Cooperating Associations, and DO-53: Special Park Uses.

Appendix E: Sensitive and Confidential Information Statement

In accordance with 54 USC 300101 et seq.: Historic Preservation, commonly called the National Historic Preservation Act; ARPA, NHPA, as amended (16 USC 470aa-mm); 54 USC 100701-100707: System Resource Inventory and Management, and NPS Management Policies (2006, sections 4.1.2. and 5.2.3), the Park may withhold from the public sensitive and confidential information, including the specific location, character, nature, ownership, or acquisition of cultural resources, and the nature and specific locations of rare, threatened, or endangered species, commercially valuable resources, caves, minerals, and paleontological resources.

Under some circumstances, the NPS may be required by law to disclose confidential information acquired during consultations, public meetings, and other research, planning, and stewardship activities, or in association with the acquisition of resources, including museum collections. Therefore, the park cannot guarantee confidentiality of all information received. To the extent permitted by law, the park will withhold from public disclosure information provided by individuals who wish the information to remain confidential and the identities of individuals who wish to remain anonymous and who are protected from release by exemption under FOIA. The

park should refer inquiries to the regional FOIA and Privacy Act officer for consultation and possible review.

MANZ will protect sensitive records, such as oral histories with redacted content, and donor's personally identifiable information.

Appendix F: Hazards in Collections

Potential health and safety concerns may exist in NPS collections due to the nature of the object or specimen or to past management strategies. Some examples of inherent risks for natural science collections include: rocks and minerals may be radioactive or contain asbestos, mercury, or arsenic; fossils from some formations may be radioactive and may emit high levels of radon; fluid-preserved specimens are sometimes fixed or stored in formalin; and taxidermy collections may contain arsenic.

Samples of materials from historic structures may contain asbestos, lead, arsenic, or other potential hazards. History, ethnology, and archeology collections may include objects with radioactive compounds; mercuric or arsenic compounds; chromium, cadmium, zinc, and lead; and pyrotechnic compound fillings, chemicals, or gas. Deteriorating cellulose nitrate film emits nitrogen oxide gases. Deteriorating cellulose acetate film emits acetic acid. Ammunition for historic firearms and unexploded ordnance (UXO) such as bombs, cannonballs, grenades, rockets, & other projectiles and explosives may be live. Spears, swords, and arrows have sharp edges and may be coated with poisons. Medical, dental, and veterinary equipment may contain viable pathogens, or toxic or controlled substances. Industrial equipment, machines, and vehicles may also contain many types of hazards such as broken glass, rust, and other contamination.

Suspected unexploded ordnance (UXO), live ammunition, and other explosives and energetic materials may be discovered in storage and on exhibit, during archeological excavation, construction, or other approved ground disturbing activities, and by park visitors. UXO is extremely dangerous and constitutes a major safety risk. Treat all ordnance with extreme caution and never assume it is disarmed. Upon discovery, secure the space where the UXO resides. Do not attempt to touch, handle, or move any suspected UXO. Contact your regional curator and park Law Enforcement Ranger or Safety Officer and provide them with the following information:

- The circumstances that the items were found, a detailed description of events, current storage conditions, and the information on instructions/labeling already completed.
- Provide a catalog number list of the UXO and any other ammunition (small arms and ordinance).
- Provide any photos that can be found and scan/include those in the correspondence. Do not go back and photograph.
- Include the number of cabinets in which these items are stored or if there are any on open shelving, in boxes, etc.

The service-wide policy outlined in NPS DO-50B, Occupational Safety and Health, along with the Museum Handbook, outlines a framework for establishing and implementing a Risk Management process when managing hazardous collections including:

- Recognize and identify the hazards
- Evaluate the hazards
- Reduce or eliminate the hazards to the extent possible

NPS DO-24 (section 4.3.11) requires that curatorial staff notify users that collections may have been treated with potentially toxic substances. All individuals seeking direct access to NPS museum collections must be provided with DI-3320 “Notice of Potential Hazards in Museum Collections.” The form must be completed before providing access to collections, including repatriations, traditional use, and loans of materials from the collection for management or research. Completed DI-3320s with original signatures must be retained by the park that is accountable for the collection being accessed for 120 years from the date the form is signed. If the recipient of the form declines to sign the form, document this in the notes section at the bottom of the form.

Known hazardous collections may be acquired or deaccessioned on a case-by-case basis and only when the hazards have been identified and can be appropriately and safely mitigated.

The MANZ collection contains UXO stored at WACC. MANZ will not accept further hazardous collections.

Appendix G: Research Collections and Permits

Per NPS Management Policies (2006), the Service encourages appropriately reviewed natural and cultural resource studies and research whenever such studies and research are consistent with applicable laws and policies. All studies and research in parks will employ nondestructive methods to the maximum extent feasible with respect to resource protection, research methodology, and the scientific and management value of the information and collections to be obtained. Although studies and research involving physical impacts to park resources or the removal of objects or specimens may be permitted, studies and collecting activities that will lead to the impairment of park resources and values are prohibited.

In implementing NPS policies and procedures to ensure scientific integrity and resource stewardship, NPS managers should consider that:

- The science is not complete until the specimens and associated data which voucher the study are appropriately documented and preserved.
- Field work and analysis are the most expensive components of scientific projects.
- The cost of field work means that each collected specimen has high financial value. Requiring that researchers deposit voucher specimens in permanent collections protects that financial investment.
- Failure to retain appropriate scientific collections to document the scientific validity of the research is not economical or ethical.
- Identifications of species in faunistic and ecological studies (versus taxonomic studies) are more often made by non-specialists using only published keys. This increases the likelihood that misidentifications may occur, resulting in lower levels of confidence in

identifications which will need to be verified by specialists in the future to validate the research.

- Using scientific collections to answer research questions can reduce some costs for new field work.
- As scientific advances are made and new techniques are developed, existing well-documented scientific collections will become even more important to NPS resource management and science.
- A specimen available today may not be available in the future, just as many specimens collected decades ago can no longer be recollected due to habitat loss, population decline, and other issues. Environmental specimens collected in a time series can never be replicated.
- Each biological specimen is a “snapshot in time” which reflects the biology and ecology of the living animal and its environment. Collecting another specimen decades later does replicate the earlier specimen of the same species.
- The passage of time, technological challenges, and prohibitive costs make it impossible to replace specimens collected but not retained when they are needed later.
- Periodic (and in some cases, routine) collection of scientific specimens for permanent retention is vital to understanding the processes, rates, and impacts of climate change.

As noted above, museum collections serve as the verifiable and reproducible evidence of a scientific study. Therefore, their collection and long-term preservation is a crucial aspect of ensuring scientific integrity.

Per Directors Order #24, and the standard permit requirements, all resource projects in parks must include funding for curation of specimens collected to prevent an increase in the backlog of uncataloged materials. The standard permit conditions require that associated project records including data, field notes, photographs, maps, etc. are submitted as part of the project’s deliverables and that they are cataloged according to NPS standards. A project is not considered completed until everything, including specimens, is cataloged and the data entered into the NPS official museum cataloging system.

Natural Resource Research Collections and Permits

Natural resource collections include non-living and living specimens. Research that includes taking plants, fish, wildlife, rocks, or minerals is governed by 36 CFR 2.5; additional guidance for research, collecting, and managing specimens and associated field records is found in the NPS Research Permit and Reporting System (RPRS), Director’s Order #77, Director’s Order #77-10, and the NPS Museum Handbook. Non-living specimens and their associated field records are managed as museum collections. Living collections will be managed in accordance with the provisions of a park’s general management plan, the Animal Welfare Act, and other appropriate requirements.

RPRS is the online system used by the NPS to manage the research application and reporting process. Park museum staff with collection custodial duties can effectively use RPRS to collaborate with park research coordinators, resource management staff, research permittees, and

repositories to help manage permanently retained collections including completion of specimen labels, submission of catalog data, and submission of copies of field notes.

RPRS is also used to help track agreements with non-NPS repositories. When a researcher applies for a permit and proposes that collected specimens be retained in a non-NPS repository, the applicant must obtain the signature of a repository official (on Appendix A of the application) agreeing to the proposal and the terms of the NPS loan agreement that would be required upon deposit of the collections. Park museum staff coordinate completion of catalog records and issue loans to document collections deposited at repositories.

Currently, NPS policy allows superintendents discretion to issue permits to park staff and other NPS staff (i.e., network Inventory and Monitoring staff), especially when specimens will be collected for retention in park collections.

Cultural Resource Research Collections and Permits

All archeological research must comply with ARPA, the Antiquities Act, and NAGPRA, as applicable. Guidance for collecting and managing field data, objects, specimens, and features of sites and structures retrieved during cultural resource research and treatment projects, together with associated records and reports, can be found in 36 CFR 79.4, Director's Order #28, and the NPS Museum Handbook. Archeological collections and their associated records are managed within the park museum collection, stored in NPS or non-NPS repositories, as appropriate, including repositories maintained by partners.

Permits that allow cultural resources to be physically disturbed or allow objects or specimens to be collected must require provisions for the long-term preservation and management of any recovered objects and specimens and for their cataloging, together with any associated records, in the NPS museum cataloging system. Independent researchers will be authorized to conduct archeological research on park lands only through the issuance of an ARPA or Antiquities Act permit by the appropriate regional director. This permitting authority cannot be further delegated. As appropriate, parks will also issue other necessary permits, such as a special use permit.

While RPRS is most used for natural resource-related research, all external research on NPS-managed lands must be documented in RPRS and may include archeological or other cultural resource research.

Reviewing Research Permits

Current guidance does not require park museum staff or the CAC to work collaboratively with park resource management staff or the research coordinator to control collecting through permit conditions or specific requirements for collections. It is recommended, however, that park museum staff work with park research and/or resource management staff to advise the superintendent on what objects and specimens should be (or must be, according to statute) collected and managed as museum property. In some parks, curatorial and natural resource staff work together to review collection permit requests and advise the superintendent to reject certain collecting requests that are duplicative of existing collections and re-direct the researcher to

conduct research on existing collections at the park or in other repositories. This process is particularly valuable to support park goals in protecting rare species, limiting/preventing duplicative or repetitive collecting, and ensuring there is no impairment of park resources or values.

Helpful links:

[National Park Service Organic Act](#)

[National Park Service Omnibus Management Act of 1998](#)

National Park Service Management Policies 2001

Natural Resource Management Reference Manual #77

[Director's Order #77 \(Natural Resources Inventory and Monitoring\)](#)

Director's Order #77-10: NPS Benefits Sharing

[Director's Order #24 \(National Park Service Museum Collection Management\)](#)

[Natural Resource Management Reference Manual 41 \(Wilderness Preservation and Management\)](#)

[Section 106 of the National Historic Preservation Act \(16 USC 470f\)](#)

[Endangered Species Act of 1973](#)

[Wilderness Act of 1964](#)

[Archeological Resources Protection Act](#)

[43 CFR 7](#)

[36 CFR 2.5](#)

[Research Permits - Everglades National Park \(U.S. National Park Service\) \(nps.gov\)](#)

[NPS Archeology Program: Federal Archeological Permits](#)

[Research Permits - Yellowstone National Park \(U.S. National Park Service\) \(nps.gov\)](#)

[Obtain a Research Permit - Bering Land Bridge National Preserve \(U.S. National Park Service\) \(nps.gov\)](#)

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