

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



Honouliuli National Historic Site

Scope of Collection Statement

July 2025



1. The foundation of what was once the shower stations at Honouliuli Internment Camp.

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**U.S. DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE****SCOPE OF COLLECTION STATEMENT**

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Table of Contents

I. INTRODUCTION	6
A. Executive Summary	6
B. Purpose of the Scope of Collection Statement	6
C. Legislation Related to National Park Service Museum Collections	8
D. Park History, Significance, Purpose, Themes, and Goals	8
E. Laws, Regulations, and Conventions Related to Museum Collections	13
F. Structures, Landmarks, and other Park Resources Listed on National or International Registries	14
G. History of Park Collection	14
II. TYPES OF COLLECTIONS	15
A. Cultural Collections	16
B. Natural History Collections	21
C. Types of Items or Collections Not Collected	22
III. MUSEUM COLLECTIONS SUBJECT TO THE NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT OF 1990	23
IV. ACQUISITION	23
A. Acquisition Criteria	23
B. Roles and Responsibilities for Accessioning and Deaccessioning	24
V. USES OF THE COLLECTION	25
A. Conditions for Use	26
B. Restrictions	27
Appendix A: Enabling Legislation	28
Appendix B: NPS Museum Collections	29
Appendix C: Legislation Related to NPS Museum Collection and Other Related Conventions, Laws, and Regulations	30
Appendix D: Uses and Restrictions of Museum Collections	35
A. General Use	35
B. Commercial Uses	37
1. Filming & Photography	37
2. Reproduction of Museum Objects for Profit	37
Appendix E: Sensitive and Confidential Information Statement	37
Appendix F: Hazards in Collections	38
Appendix G: Research Collections and Permits	39

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I. INTRODUCTION

A. Executive Summary

Honouliuli National Historic Site and its partners work to preserve, interpret, and commemorate the historical narrative of Honouliuli Internment Camp, where civilians were incarcerated and prisoners of war (POWs) were held during World War II. Initially designated as Honouliuli National Monument in 2015, the unit was redesignated as a National Historic Site in 2019. While the park is not yet open to the general public due to landownership issues, limited public tours are being planned for 2026. These 25-person tours are currently the only option for the public to access the park. Because of such limited access, the museum collection will play a significant role in outreach, education, and interpretation.

The park is not actively collecting museum objects, does not have an active museum collection, and does not have accession or catalog records. This Scope of Collection Statement is the first created for the park and will guide the development of a suitable collection. It will also aid documentation of material gathered during the park's first collecting phase, including archaeological material and archival material such as Resource Management Records, associated records, photographs, and oral histories resulting from research conducted by the park and its partners.

Further avenues of research, potential sources for museum acquisitions, restrictions on collection of materials inappropriate for the museum collection, and collaborations with community partners are identified below as opportunities for expanded interpretive storytelling, the establishment of a supporting museum collection, and fulfillment of the park's enabling legislation.

B. Purpose of the Scope of Collection Statement

This Scope of Collection Statement (SOCS) serves to define the scope of present and future museum collection holdings of Honouliuli National Historic Site that contribute directly to the understanding and interpretation of the park's purpose, themes, and resources, and that must be preserved by Federal mandate. It is designed to ensure that all museum collections are clearly relevant to the park, and to incorporate updated planning documents related to the acquisition, management, and interpretation of the museum collection. This Scope of Collection Statement must be reviewed every five years and, when necessary, must be revised to remain supportive of and consistent with any changes in the park's mission. The approval of the Superintendent is required for any revisions to the SOCS.

[Director's Order #24: NPS Museum Collection Management](#) requires each park to possess an up-to-date Scope of Collection Statement to "...identify the scope of collecting activities and define the purpose of the collection." This stand-alone museum planning document succinctly

defines the scope of the park's museum collection holdings, at present and for the future. The Scope of Collection Statement is a critical basis for managing museum collections by detailing what the park should collect and why.

An up-to-date Scope of Collection Statement helps to ensure that the park's museum collection is relevant to and supportive of the park's mission, resource management goals and objectives, and public service and stewardship responsibilities. It guides the park in the acquisition and management of those museum objects that contribute directly to the park's mission, as well as those additional collections that the National Park Service (NPS) is legally mandated to preserve including archaeological and natural resources within the site's boundaries and archival collections documenting the site's development and operation as a unit of the NPS.

NPS museum collections are distinguished in two ways from standard museum collections. They are notably site-specific, usually pertaining directly to the history and environment of the specific NPS unit. The NPS Museum Management Handbook notes that "the vast majority of holdings in NPS museums are derived either from within the park boundaries or from areas intimately associated with the parks." The other unique characteristic of NPS museum collections is that they are part of the larger NPS museum system. Taken as a whole, the National Park Service's museum collection is a broad and diverse representation of the natural and cultural heritage of the American people. Museum holdings are accessioned with the intent that they will be cared for in perpetuity under statutory mandates such as The Organic Act and other federal statutes. Maintaining a relevant and appropriate Scope of Collection Statement is therefore a necessity for each NPS unit, both to direct collecting activities toward meeting the unit's needs and to ensure that the unit is able to meet its public trust obligations by adequately caring for its collection.

Specifically, the Scope of Collection Statement:

- defines the purpose of the park's museum collection
- sets agreed-upon limits that specify the subject matter, geographical location, and time period(s) to which the collection must relate
- is based upon legislation and planning documents specific to the park, and on laws, regulations, and NPS policies governing research and specimen collection conducted within park boundaries
- states what types of objects will be acquired to fulfill the park's mission
- considers collection use, restrictions, and the ability of the park to provide a level of care consistent with NPS standards

C. Legislation Related to National Park Service Museum Collections

The National Park Service’s legal mandate for acquiring and preserving museum collections is contained in the following acts commonly referred to as the Antiquities Act of 1906 (54 USC 320301-320303); the Organic Act of 1916 (54 USC 100101(a) et seq.); the Historic Sites Act of 1935 (54 USC 320101-320106, 102303, 102304, 309101); the Management of Museum Properties Act of 1955, as amended (54 USC 102501-102504); the National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq); the Archeological and Historic Preservation Act of 1974, as amended (54 USC 312501-312508); the Archaeological Resources Protection Act of 1979, as amended (16 USC 470aa-mm); and the National Parks Omnibus Management Act of 1998 (54 USC 100701 et seq.).

For additional information, refer to the *NPS Museum Handbook, Part I*, Appendix A, which includes a detailed listing of the various laws, regulations, and conventions related to NPS museum collections.

D. Park History, Significance, Purpose, Themes, and Goals

1. Legislative History

President Barack Obama established Honouliuli National Monument by Presidential Proclamation on February 24, 2015. The purpose of the proclamation was “to preserve and protect the historic objects at Honouliuli... and, for the purpose of protecting those objects, reserve as a part thereof all lands and interests in lands owned or controlled by the Federal Government within the boundaries described on the accompanying map entitled ‘Honouliuli National Memorial.’” The proclamation authorized the Secretary of the Interior to “manage the monument through the National Park Service, pursuant to applicable legal authorities, consistent with the purposes and provisions of this proclamation.”

On May 8, 2018, Representative Colleen Hanabusa (D-HI-1) introduced into the United States House of Representatives H.R.5706, the World War II Pacific Sites Establishment Act. While this bill died in Congress, several provisions were incorporated into the John D. Dingell Jr. Conservation, Management, and Recreation Act. Introduced in the Senate on January 8, 2019, and cosponsored by Senators Lisa Murkowski of Alaska and Maria Cantwell of Washington, the bill redesignated Honouliuli National Monument as Honouliuli National Historic Site. It also identifies the primary purpose of Honouliuli National Historic Site as, “to preserve and interpret for the benefit of present and future generations the history associated with the internment and detention of civilians of Japanese and other ancestries during World War II in Hawai’i, the impacts of war and martial law on society in the Hawaiian Islands, and the co-location and diverse experiences of Prisoners of War at the Honouliuli Internment Camp site.” President Donald Trump signed the bill creating Honouliuli National Historic Site on March 12, 2019.

2. Brief Description of the Park

Honouliuli National Historic Site was established to preserve and protect 123 acres of the original 160-acre Honouliuli Internment Camp where incarcerated civilians and prisoners of war (POWs) were held during World War II. Constructed on the 'Ewa Plain, Honouliuli is located within the deep gulch of the Honouliuli Stream Gulch, ("the Gulch"), three miles northwest of Pearl Harbor. It was part of the Waiahole Water System, a 26-mile-long network of irrigation infrastructure to irrigate sugarcane fields on the western side of O 'ahu.

The name *Hono 'uli 'uli* (translated as "dark bay") is derived from the traditional Hawaiian land division (*ahupua 'a*) within which the camp was constructed. The traditional history of the *Hono 'uli 'uli ahupua 'a* is one of hundreds of years of human habitation, with cultural sites and natural resources bearing significance to the Native Hawaiian community.

Western contact starting in the late 18th century led to land privatization and the introduction of an agricultural-based economy in Hawai'i, including the proliferation of the sugarcane industry. heralding vast ecological, demographic and social changes, it was at the onset of the "sugar era" that much of the *Hono 'uli 'uli ahupua 'a* was converted into cane fields as part of the O 'ahu Sugar Company, and contract workers from Japan, China, Okinawa, the Philippines, and other countries were recruited to work the fields. By World War II, approximately 37% of Hawai'i's population (159,000 people) could trace their ancestry to Japan.

The devastation following the attack on Pearl Harbor on December 7, 1941 led to the immediate declaration of martial law in the Territory of Hawai'i, granting the U.S. military civic authority until October 24, 1944. Among hundreds of orders issued, the FBI and U.S. military were extended authority to single out, interrogate, and detain civilians suspected of disloyalty to the United States. Nearly 2,270 individuals were arrested in the days and weeks to follow. Those arrested were held at 16 *ad-hoc* confinement sites established on six of the main Hawaiian Islands. Most of the detainees were transferred to camps on the continental U.S. until Honouliuli Internment Camp opened on March 2, 1943.

In contrast to the mass incarceration of Japanese Americans on the U.S. West Coast under Executive Order 9066, arrests in Hawai'i affected a smaller group of individuals, with business and religious leaders and educated individuals in the Japanese American community being targeted, as well as civilians of European ancestry related to the Axis powers. Resistance from community coalitions, regulatory powers granted under martial law, and the need to maintain the island's workforce all served to prevent mass incarceration. Because arrestees were singled out and set apart from their communities, the social and psychological stigmas they endured for being wrongfully accused were particularly devastating.

Honouliuli was the only camp in Hawai‘i constructed with the express purpose of confining civilians incarcerated during World War II. Containing seven compounds and situated amidst sugar cane fields, over 400 civilians were incarcerated at Honouliuli until its closure in 1946. Honouliuli also became the largest POW camp in the Hawaiian Islands, holding over 4,000 Okinawan, Korean, Japanese, Italian, Filipino and Taiwanese (Formosan) enemy soldiers, non-combatant laborers, and conscripts in compounds directly adjacent to the incarcerated civilians. POWs came to Honouliuli bearing the emotional burden of their own struggles and losses, with their diverse impressions impacted by wartime political status and daily experiences in and out of camp. Many POWs shared heritage or even familial ties with the ethnically diverse population of Hawai‘i, making interaction common.

After Honouliuli closed in 1946, the camp was dismantled, and the history went untold for many years. In 2002 volunteers from the Japanese Cultural Center of Hawai‘i rediscovered remnants of the camp in the Honouliuli stream gulch, inspiring scholarship and awareness campaigns to bring this history into the public eye. Today, Honouliuli National Historic Site serves as a place to reflect on wartime experiences and a recommitment to the pursuit of freedom and justice.

3. Park Purpose Statement

The purpose of Honouliuli National Historic Site is to conserve and interpret the largest and longest-used World War II incarceration site in the Hawaiian Islands. The park provides opportunities for public education about the World War II incarceration story in Hawai‘i, invites reflection on wartime experiences, and recommits us to the pursuit of freedom and justice.

4. Park Significance

A National Historic Site’s significance lies in the important and distinct character embodied in the parks’s places and resources. Honouliuli National Historic Site’s significance statements articulate the park’s historical and cultural significance resources are distinctive and what they contribute to our heritage. Defining a National Historic Site’s significance informs decisions made by park staff and cooperating partners in efforts to preserve the property and maintain its character-defining features to accomplish the park’s purpose. The following significance statements have been identified for the Honouliuli National Historic Site:

- **Honouliuli Internment Camp.** The Honouliuli Internment Camp was the largest and longest-used incarceration facility in Hawai‘i during World War II. Run by the U.S. Army, hundreds of incarcerated civilians from Hawai‘i were co-located with thousands of prisoners of war from both the Pacific and European theaters. Set in an isolated gulch, the park is in close proximity to Pearl Harbor, the catalyst to America’s involvement in World War II.
- **Incarceration in Hawai‘i.** Public awareness of the incarceration of Japanese Americans

and European Americans in Hawai‘i during WWII is lesser known than the history of incarceration in the continental U.S.. In bringing this history to the public eye, Honouliuli illustrates the government’s strategy to selectively target and detain civilians under martial law, as well as the crippling impact and stigma on those affected.

- **Martial law.** The United States government imposed martial law on Hawai‘i from December 7, 1941 to October 24, 1944. In terms of duration, and the total population and land area affected, this use of martial law is unprecedented in United States history and had a lasting social impact on the Hawaiian Islands.
- **Injustice.** Honouliuli Internment Camp represents one of seventeen known sites in Hawai‘i used to unjustly incarcerate people of Japanese and other ethnicities. It serves to remind us of the critical importance of safeguarding civil liberties and maintaining our national values during times of crisis.
- **Portal to World War II history on the home front and abroad.** Honouliuli National Historic Site serves as a portal to broader themes associated with World War II in Hawai‘i, including Japanese American military enlistment, transnationalism, and community advocacy and activism. The legacy of this time period is reflected in thousands of personal stories that illustrate the diverse experiences, impacts, and perspectives of individuals and multi-ethnic communities.
- **Cultural resources.** Honouliuli National Historic Site contains rare archeological sites and cultural landscape features, contributing to the distinctive character of the former internment camp and exhibiting the many entwined layers of history and culture that encompass hundreds of years of human occupation at Honouliuli.

5. Supporting Documentation & Resource Management

General National Park Service documents that aid Honouliuli National Historic Site in the administration of its collections include *NPS Management Policies* (2006), *Director’s Order #28: Cultural Resources Management*, and the *NPS Museum Handbook, Parts I-III*.

A Special Resource Study and Environmental Assessment were completed in 2011 and recommended the site be created as a new unit of the National Park Service. The park’s Foundation Document was completed in August 2019. These documents informed the following sections: Park History, Park Significance, Park Purpose, and Interpretive Themes.

6. Interpretive Themes

The interpretive themes and resource management goals and objectives serve as guidelines for acquiring objects for the museum collection. The themes are from the park's Foundation Document (2019).

The following interpretive themes have been identified for the Honouliuli National Historic Site:

- The bombing of Pearl Harbor by Japan fueled public fear, hysteria, prejudice, and racism, which ultimately resulted in the unjust incarceration of people of Japanese and other ancestries throughout the Hawaiian Islands.
- Minutes after the bombing of Pearl Harbor, implementation of martial law seemed practical and justified; but in the three years that followed, military control spread over nearly every facet of civilian life, dividing an already wounded community and resulting in the institutionalization of fear and mistrust.
- The realities of wartime in Hawai'i tested the nature of community, civilian-military relationships, family, patriotism and identity--catalyzing moments of courage, sacrifice, resilience, advocacy and *ganbate* (translated from Japanese as "do your best" or "work hard").
- Honouliuli is a place to reflect upon the guarantees of the United States Constitution and American democratic principles of justice and equality; it is a powerful reminder of our shared responsibility to avoid fearmongering and the rationalization of systemic discrimination in times of crisis.
- Honouliuli's rugged "natural prison" created by the physical geography of the Gulch was Hawai'i's largest POW camp--thousands of soldiers, conscripted laborers and refugees from Okinawa, Korea, Japan, Taiwan, the Philippines and Italy were held in compounds adjacent to incarcerated civilians. Given the shared heritage of many POWs and the local population, their experiences in Hawai'i and the Pacific provide an opportunity for meaningful reflection on the effects of war on transnational communities, as well as the wide-ranging impacts and tragedies of war on both sides of the battlefield.
- The name Honouliuli is derived from the traditional Hawaiian land division (*ahupua'a*) within which the camp was constructed. The prewar history of the *Hono'uli'uli ahupua'a* spans hundreds of years of human habitation and provides a vantage point from which to view the impacts of the introduction of an agricultural-based economy, land privatization and the legacy of the U.S. military presence in Hawai'i.

E. Laws, Regulations, and Conventions Related to Museum Collections

Archaeological collections, except inalienable and communal property (as defined by the Native American Graves Protection and Repatriation Act of 1990 [25 USC 3001-13]), recovered from within park boundaries through systematic collection are National Park Service property and must be retained in the park's museum collection in accordance with Code of Federal Regulations, 43 CFR 7.13.

In accordance with the NPS Research Permit and Reporting System, permits to collect natural resource specimens state that retained specimens remain Federal property, are incorporated into the park museum collection, and, as required by Code of Federal Regulations, 36 CFR 2.5(g), must bear official National Park Service museum labels. Their catalog numbers must be registered in the National Park Service's National Catalog. 36 CFR 2.5(g) states that specimen collection permits issued by the Park Superintendent must contain the following conditions: "(1) Specimens placed in displays or collections will bear official National Park Service museum labels and their catalog numbers will be registered in the National Park Service Catalog, and (2) Specimens and data derived from consumed specimens must be made available to the public, and reports and publications resulting from a research specimen collection permit shall be filed with the superintendent."

Other laws, regulations, directives and conventions pertinent to the acquisition of museum collections at Honouliuli National Historic Site include: the Federal Property and Administrative Services Act of 1949, as amended (40 USC 483[b]); the Federal Records Act of 1950, as amended ("Records Management by Federal Agencies" [44 USC 3101 et. seq.]); the Freedom of Information Act of 1966, as amended (5 USC 552); the Privacy Act of 1974 (5 USC 552a); United States Code, Title 17, "Copyrights" including the Copyright Act of 1976 (17 USC 101 et. seq. [1988 & Supp.V 1993]); the American Indian Religious Freedom Act of 1978 (42 USC 1996); the Native American Graves Protection and Repatriation Act of 1990 (NAGPRA) (25 USC 3001-13); Code of Federal Regulations, 41 CFR 101, "Federal Property Management Regulations;" Department of the Interior, Departmental Manual, 410 - Interior Property Management Regulations; Department of the Interior, Departmental Manual, 411 - Managing Museum Property, Chapters 1-3; Code of Federal Regulations, 36 CFR 79, "Curation of Federally-Owned and Administered Archeological Collections;" Code of Federal Regulations, 43 CFR 10, "Native American Graves Protection and Repatriation Regulations;" Code of Federal Regulations, 36 CFR 1228, "Disposition of Federal Records;" Code of Federal Regulations, 43 CFR 7, "Protection of Archeological Resources;" Code of Federal Regulations, 43 CFR 3, "Preservation of American Antiquities;" United States Code, 44 USC 2109, "Preservation, Arrangement, Duplication, Exhibition of Records" (44 USC 2109); United States Code, 44 USC 3301-3324, "Disposal of Records;" *Director's Order #11D: Records and Electronic Information Management* together with the Service-wide Records Schedule (SRS) and the Records and

Electronic Information Management (REIM) Guide; *Director's Order #24: NPS Museum Collections Management*; *Director's Order #28: Cultural Resource Management*; *Director's Order #44: Personal Property Management*; the 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).

For additional information, refer to the *NPS Museum Handbook*, Part I, Appendix A, which includes a detailed listing of the various laws, regulations, and conventions related to NPS museum collections.

F. Structures, Landmarks, and other Park Resources Listed on National or International Registries

Honouliuli Internment Camp (09000855) was listed on the National Register of Historic Places in 2012.

Although not included as part of the Honouliuli National Historic Site, the following properties listed on the National Register of Historic Places enhance the preservation and interpretation of Internment History in Hawai'i: The U.S. Immigration Station (73000664) in Honolulu was listed in 1973. The Historic Honolulu Police Department and Yokohama Specie Bank were listed in 1973 as part of the Merchant Street Historic District (73000661). The Kaua'i County Courthouse in Lihue was listed as part of the Lihue Civic Center Historic District (81000204) in 1981. In 1986, the Maui County Police Station and Maui County Courthouse were listed on the National Register of Historic Places as part of the Wailuku Civic Center Historic District (86000624).

Additionally, the Special Resource Study (2011) identified the following sites as eligible for listing on the National Register of Historic Places: The Kilauea Military Camp, located within Hawai'i Volcanoes National Park, and the Lāna'i City Jail and Courthouse in Lāna'i City. Nine further sites located on four islands (The Islands of Hawai'i, Kaua'i, Maui, and O'ahu) were identified by the study as sites needing further research to determine their significance and integrity.

G. History of Park Collection

The park does not currently have an active museum collection. This Scope of Collection Statement is intended to provide clarity, in hindsight, for the first phase of collecting, which focused largely on archaeological records and oral histories, and guide the development of future park collections. The repository/storage facility for the park's museum collections is shared with Pearl Harbor National Memorial.

Several projects undertaken by the park and its partners since its establishment in 2015 have produced documents and objects which will be included in the first phase of collecting. These

include ten oral histories with former Prisoners of War from Okinawa who were held at Honouliuli and an additional two oral histories of Military Intelligence Soldiers (MIS) who served at Honouliuli. As the park continues to collect oral histories, the development of an oral history management plan is paramount to ensure appropriate documentation, organization, and preservation. Please see Section II.A.5 below for guidance on establishing a management plan to guarantee proper stewardship of oral histories.

Additionally, the park has been formally associated with four archaeological fieldwork seasons conducted at the site which have resulted in the collection of artifacts and the production of associated records. Prior to 2016, excavations and surveys were conducted by the cultural resource management firm Trans Siberian and the Japanese Cultural Center of Hawai'i. Beginning in 2016, survey and limited excavation has been conducted through a CESU agreement with Professor Bill Belcher of the University of Hawai'i West O'ahu. The objects and records produced from the field school are currently stored in the park repository shared with Pearl Harbor National Memorial, although they have not yet been formally accessioned.

Beyond the items mentioned above that will be included in the collection, there may be potential for acquisition of collections through military branches operating in Hawai'i, community members and organizations, or other historical societies and organizations. Further research and community engagement will be vital for this second phase of collecting.

II. TYPES OF COLLECTIONS

The primary purpose of the museum and archives collection is to document the incarceration of Japanese Americans and European Americans as well as prisoner of war internment in Hawai'i through personal stories, oral histories, era artifacts, and photographs which describe and depict the changes to civilian life during martial law during WWII. The collection improves the visitor experience by providing visual and descriptive primary source documentation of the experiences of prisoners of war and incarcerated civilians, contributing to increased knowledge and understanding among present and future generations.

The Honouliuli National Historic Site museum collection and archives' secondary purpose is to contribute to a more nuanced understanding of the social and economic atmosphere in Hawai'i prior to World War II. By maintaining material which provides a complete record of the human habitation of Honouliuli Gulch and the surrounding area, the social circumstances and economic environment which led to the unique character of civilian incarceration in Hawai'i are better recognized and acknowledged. Collecting material from the post-war era related to the site and its history addresses the community response to the tragedy.

A. Cultural Collections

The cultural collection is subdivided into five disciplines: archeology, ethnology, art, history, and archives and manuscripts. The following list identifies, by discipline, object types appropriate to the park's museum collection. Material with an identifiable connection to former incarcerated civilians, prisoners of war, military employees of Hawai'i incarceration sites, local residents, and family members should be prioritized for addition to the collection.

1. Archeology

NPS sites are mandated to collect and preserve archaeological collections and associated data acquired as a result of systemic investigations within the park's boundaries in accordance with 43 CFR 7.13 and *NPS Management Policies* (December 2011).

Artifacts and Specimens

a. Permitted or project-funded archeology: all objects that were recovered as a result of a systematic investigation using archeological techniques. May come from dry land or underwater excavations. The park will collect any permitted or project-funded archeology. Archeological research projects or compliance work at the park may result in the collection of objects in addition to a variety of other kinds of data. Archeological collections could include historic building materials, sub-surface artifacts and ecofacts (urban waste).

b. Surface finds and other unauthorized field collections: all objects that were recovered without a permit or a systematic investigation. The park will actively discourage this type of find when possible. The park currently has collected no surface finds.

Associated Records: A type of resource management records. They include field notes, reports, site forms, correspondence, maps, and drawings prepared in connection with studies or projects carried out at the park in archeology, paleontology, biology, ethnology, and geology. Records can either be compiled and/or written by NPS staff, contractors, or private researchers working under park-issued permits. Associated records should be processed as an archival collection. The park will collect any associated records relating to archeology collections. If work is completed by an outside organization, the park should make an effort to obtain copies of the associated records for the museum collection.

2. Ethnology

This category encompasses objects produced by or associated with Native Americans or other indigenous peoples from contemporary cultures. Note: all objects recovered by archeological means are archeology. The park does not currently have any ethnographic material in its collection, nor does it anticipate collecting any objects related to Native Hawaiian culture that

are subject to the Native American Graves Protection and Repatriation Act (NAGPRA) or State of Hawai‘i regulations.

3. Art

Historic Art Pieces: Art pieces created by adults or children in the period of significance which illustrates the experience of incarcerated civilians, Prisoners of War, community members or the effect of martial law in Hawai‘i.

Modern or Contemporary Art Pieces: Art pieces made by military members or civilians following the war with subjects surrounding their experience or memories of the internment system and/or life under martial law in Hawai‘i. Items made by contemporary artists with no firsthand experience or connection should be evaluated for acquisition considering interpretive needs, quality, rarity, and research value. Items are subject to review by the Honouliuli National Historic Site Collections Advisory Committee.

4. History

This category encompasses materials made or used by cultures with a written tradition up to the present time. Historic objects relate to the people, activities, and events associated with a park’s mission, themes, and history. Types of historic materials collected by Honouliuli National Historic Site include:

Honouliuli Internment Camp: Historic material specifically associated with the incarceration of Japanese nationals, American citizens of Japanese and European descent, and prisoners of war at Honouliuli. This could include personal possessions, clothes, crafts or decorations, furnishings, products made on-site, equipment and supplies, and official documents of camp residents including internees, prisoners of war, and military employees.

Hawai‘i Internment System Sites: Historic material related to other sites in Hawai‘i where civilians were detained, processed, interrogated, and incarcerated. Material that conveys the political, economic and social mechanisms which culminated in the forced detention of certain members of Japanese American society during WWII. Additionally, objects that help demonstrate the differences between incarceration in Hawai‘i and the continental United States should be a focus of collecting efforts.

POW Internment in Hawai‘i: Honouliuli was not the only prisoner of war camp in Hawai‘i, and the majority of people held at the camp from 1943-1946 were prisoners of war of Okinawan, Korean, Japanese, Taiwanese, Filipino, and Italian descent. As non-American citizens and enemy combatants, their wartime experiences differed from their incarcerated counterparts, who were

American citizens and residents. Items which demonstrate the POW's unique experiences should be prioritized for collection.

Martial Law: The length and extent of martial law in the Hawaiian Islands during WWII was unprecedented in U.S. history. Objects including but not limited to court documents, military logs and registers, and photographs that record the jurisdiction, implementation, administration, and effect on the local population of martial law should also be collected. Military equipment explicitly used in the enforcement of martial law may also be considered for inclusion in the collection on a case-by-case basis by the Honouliuli National Historic Site Collections Advisory Committee.

Constitutional Rights and Human Rights: The incarceration and internment of citizens and non-citizens addresses larger issues of the infringement of Constitutional rights. Material associated with the denial of freedoms of American citizens guaranteed by the Constitution, as well as the treatment of foreign enemies according to the Third Geneva Convention (1929, revised post-WWII in 1949), will be collected by the park as it applies to residents of Hawai'i during WWII.

Plantation History of Hawai'i: The economic and social influence of the plantations in Hawai'i directly contributed to differences in treatment of Japanese Americans in incarceration and internment camps in Hawai'i and in the continental United States. The park will collect objects including but not limited to ledgers, financial documents, immigration paperwork, and personal possessions that illuminate these essential prewar historical, cultural, economic, and social contexts.

Anti-Japanese Sentiment in Hawai'i: Prior to and during WWII, governmental agencies systemically registered, spied on, and researched suspected citizens of Japanese descent. People born in Japan were prohibited from becoming United States citizens. Manifestations of anti-Japanese sentiment in Hawai'i did not infiltrate domestic and public life as deeply as on the continent, yet its insidious nature affected the lives of Japanese Americans living in Hawai'i in other ways. Material describing and documenting the influence of anti-Japanese and xenophobic attitudes within governmental agencies should be considered for acquisition.

Human Occupation of Honouliuli Gulch: Limited material documenting the human habitation of Honouliuli Gulch before and during the plantation era and during the post-war ranching era will be collected by the park. All such proposed acquisitions will be reviewed by the Honouliuli National Historic Site Collections Advisory Committee.

Memorial Material: Objects left by visitors in a memorial capacity will be documented by park staff and some items will be included in the museum collection. Items that are included must have a unique, personal connection to the site and its themes. All material is subject to review by the Honouliuli National Historic Site Collections Advisory Committee. See Section II.C for restrictions and guidance.

5. Archives and Manuscripts

Archival materials that may be accessioned into the NPS museum collections include records created by the park, such as associated records and other resource management records; copies of records created by the park, if the park is required to transfer the originals to the National Archives; personal papers acquired through donation or purchase; and organizational archives acquired through donation or purchase. Copies of material held by other institutions will not be accessioned into the NPS museum collections.

The park will collect stories, photographs, oral histories, manuscripts, audiovisual media, and ephemera that document the WWII experience of incarcerated civilians and POWs in the Hawaiian Islands. The park will also maintain an administrative history to document the establishment and administration of the park, and to preserve permanent records. Types of archives and manuscripts collected by the park include:

Park Records: Records that document a unit's activities may include administrative central files; planning documents; resource management records; reports; building and project files; photographs; maps; and drawings. Park records of primary importance include:

a. Cultural Resource Management Documents: Blueprints and architectural drawings that provide a history of alterations and rehab projects to the site's classified structures, landscape or other resources shall be maintained as part of the museum collection.

b. Administrative History Collections: National Park Service generated documents related to the administration of the park are preserved in museum storage. Ephemera such as awards, materials relating to anniversaries or other special events, and honorary certificates will also be collected and maintained as the "Park Archives." Director's Order NPS #11D, together with the Service-wide Records Schedule (SRS) and the Records and Electronic Information Management (REIM) Guide, will be used to provide guidance on the retention and disposition of inactive records or those being accessioned into the museum collection for long-term protection.

c. Field Documentation: see Archeology section.

d. Associated Records- Natural Resources: see Natural Resources section.

e. Photographic materials documenting the administrative history of Honouliuli National Historic Site: Photographs that trace the development of the site through its private ownership following WWII and subsequent ownership by the National Park Service will be incorporated into the park's collections. The park will continue to document the restoration and evolution of the site through both color and black-and-white print photography. These photographs will be added to the collection when they are no longer being actively used by park staff.

Oral Histories: The park collected ten oral histories of former Okinawan prisoners of war and two oral histories of MIS soldiers who served at Honouliuli Internment Camp during research for park planning projects. Recordings or stories in any format may also be collected at special events and in conjunction with outreach projects and partnerships. In order to collect as many different experiences as possible, the park should collect “stories,” informal oral histories and personal biographies. These accounts capture, in their own words, specific memories of former incarcerated civilians, prisoners of war, military employees, local families, and their descendants. They may be submitted by the participant or also by relatives and acquaintances of participants.

Prior to recording an oral history (or accepting a pre-recorded one), documentation confirming the park’s ownership of the oral history must be completed. For those being recorded by the park or a collaborating institution, an Interview Agreement must be completed by the interviewer and the interviewee. For pre-recorded histories, a Deed of Gift must be signed by the donor and the park Superintendent. Completion of these documents confirms the park’s ownership of the copyright and ensures the interviewee is giving informed consent to use of their interview content. Without either the Deed of Gift or the Interview Agreement, oral histories will not be taken or incorporated into the park’s archives. The interviewee will have the opportunity to edit the file for accuracy before it is published.

Copies of oral history files will be stored in multiple locations and multiple formats to ensure access continuity and file fixity. A spreadsheet detailing metadata and documentation for each recording will be stored in the master file folder as well as in each back-up location. The metadata schema will be developed in collaboration with the Center for Oral History at the University of Hawai‘i at Mānoa or similar institution with a special focus on controlled vocabulary. Captioned video files will be uploaded to the park’s website and the Internet Archive for public access. No video files will be made publicly available without captions to ensure compliance with Section 508.

Government and Military Publications and Documents: The collection of posters, handbills, pamphlets, and advertising materials generated by the federal government or other agencies for distribution in Hawai‘i may be collected. The materials may include military orders, logs, registers, instructions of civilians, forms, and other such paperwork which demonstrates the unique administration of Hawai‘i during WWII.

Film and Audio Media: Motion pictures, original newsreels, commercial and industrial films, government propaganda films, and personal home movies related to life under martial law may be added to the collection. When motion pictures are not available in their original format, copies on VHS, CD or DVD may be collected. A duplicate will be made available for general use in the library. Sound recordings in the collection may be in the form of WWII period radio news and entertainment programs, music, and interviews. Digitally reformatted recordings of original or contemporary recordings may also be added to the collection.

Photographs and Negatives: The museum may collect original photographs, negatives, snapshots, and albums illustrating the interpretive themes as outlined in this document pertaining to the WWII years. Although originals are preferred, the park may accept donations of high-quality digital prints in place of the originals. Nitrate negatives will be identified and reformatted on to safety film or scanned and then housed in cold storage or disposed of. Persons wishing to donate digital scans of original materials should be encouraged to also provide digital prints so as to not place the burden of printing on the park.

Published materials: In accordance with NPS Management Policies, rare books and other library materials retained for their physical properties, associative value, or for purposes of exhibition in museum exhibits will be managed as part of the Park's museum collection.

Newspaper clippings: Newspaper clippings from local, national, or international papers related to the events of the WWII in Hawai'i, the implementation and administration of martial law, and reparation efforts for internees following 1946 should be included in the museum collection. All newspapers should be copied onto archival paper when cataloging. The archival copies are to be maintained as part of the museum collection; the original newspaper print may be disposed of. Digital scans of the original newspapers will be created wherever possible before disposal of the originals. If a newspaper article is included in personal papers, such as an album, the item should be copied onto archival paper but not disposed of.

B. Natural History Collections

Paleontological, geological, and biological specimens comprise the natural resource collections in the National Park Service. Natural resource collections can inform park planning, natural resources management, cultural landscape management, and interpretive programming in the parks where they are collected.

Honouliuli National Historic Site may collect natural resource specimens in the future. If a natural history collection is established, the Scope of Collections will be revised accordingly. Natural resource specimens are collected using the following guidance: Code of Federal Regulations, 36 CFR 2.5(g), "Parks, Forests, and Public Property, Chapter I: National Park Service, Department of the Interior, Part 2: Resource Protection, Public Use and Recreation, Sub-Part 5: Research Specimens." This guidance states that natural history specimen collection permits issued by the park Superintendent must contain the following conditions: "(1) Specimens placed in displays or collections will bear official National Park Service museum labels and their catalog numbers will be registered in the National Park Service National Catalog, and (2) Specimens and data derived from consumed specimens will be made available to the public and reports and publications resulting from a research specimen collection permit shall be filed with the Superintendent."

Paleontology: Includes plant, animal, and trace fossils. The park may collect any paleontological items through permit and park research.

Geology: Includes rocks, minerals, surface process samples, and soils. The park may collect any geological items through permit and park research.

Biology: Includes: plants, fungi, insects, arachnids, other invertebrates, reptiles, amphibians, fish, bird, and mammal specimens and related derivatives. Assembled and managed collections of plant, fungi, monera, and Protista make up herbarium collections. The park may collect any biological items located through permit and park research.

C. Types of Items or Collections Not Collected

1. Mainland Internment

The park does not collect any objects or archival materials related to Japanese, Japanese-American, or prisoner of war internment at sites located on the mainland of the United States. The park may collect stories and items of prisoners of war and incarcerated civilians who were once held in Hawai'i before being transferred to the continent. All such objects and archival materials and those without a clear and documented provenance of the Hawaiian Islands will be reviewed by the Honouliuli National Historic Site Collections Advisory Committee. If objects or archival materials related to mainland sites are proposed to Honouliuli National Historic Site, the Honouliuli National Historic Site Museum Curator will refer the donor to the appropriate NPS unit or non-federal entity.

2. Non-Memorial Objects

Material left by visitors is considered abandoned property. Those objects left in a memorial capacity which meet one or more of the following criteria will be photographed and documented, but will not be included in the permanent museum collection. All other items will be reviewed for collection by the Collections Advisory Committee, according to Section II.A.4.

- Mass-produced, impersonal items
- Items left by school or youth groups (only a representative sample will be kept)
- Perishable or biotic items (flowers, foods, etc.)
- Items likely to deteriorate due to inherent vice
- Items which pose a safety hazard or that contain a chemical residue
- Random items (pencils, hats, etc.) that appear to have been left by accident

3. Interpretive Objects

Objects used as interpretive props will not be accessioned into the Honouliuli National Historic Site museum collection. This includes replicas used during interpretive demonstrations or exhibitions intended to enhance the visitor experience.

4. Library Materials

Library materials that do not meet the above requirements (Section II.A.5) are not managed as part of the site's museum collection. Policies and procedures for library materials are outlined in the *NPS Management Policies* (December 2000), Chapter 5; DO-28, *Cultural Resource Management Guideline*.

5. General Reference Materials or Duplicates

Donations of non-unique copies of original materials considered more useful for general reference or already well-represented in the collection may be transferred to the library reference files or to the Interpretation staff and not accessioned into the collection.

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

The park's museum collection does not include human remains, associated or unassociated funerary objects, sacred objects, or objects of cultural patrimony as defined by the Native American Graves Protection and Repatriation Act of 1990, P.L. 101-601 (NAGPRA). Acquisition of such objects by the park is not anticipated.

IV. ACQUISITION

A. Acquisition Criteria

Additions to the museum collection are made through gift, transfer, exchange, loan, purchase, or field collection. National Park Service guidelines and procedures governing each of these transactions are outlined in the *NPS Museum Handbook, Part II*, Museum Records. Accession and catalog records are maintained for museum acquisitions as outlined in the handbook.

Acquisition of museum objects is governed by the park's ability to manage and preserve the collection according to Chapter 5 of the *NPS Management Policies* (2006), DO-28, *Cultural Resources Management*, and the *NPS Museum Handbook, Part I*, Museum Collections. In accordance with NPS policy, the park may not accept donations with donor-imposed restrictions or limiting conditions except in very limited circumstances (i.e. the donation contains medical or criminal history that could impact living relatives). However, museum collections are subject to

legal restrictions, such as privacy laws and classified data. Refer to the *NPS Museum Handbook* Part III, Chapter 2: Legal Issues, for information on use and access restrictions.

Incoming loans will be acquired only for a particular purpose such as research or exhibition, and for a specified and defined period of time. Current incoming loan forms (10-98) will be maintained for all items on loan to the National Park Service. All outgoing loans are subject to adequate completion of the American Association of Museum's loan checklist. All loans must receive approval from the Superintendent before they are accessioned as part of the collection.

The park will not be a partner to, or encourage in any way, the trafficking in illicitly collected materials. All acquisitions must be collected, exported, imported, transported, or otherwise obtained and possessed in full compliance with the laws and regulations of the country of origin, the United States Federal government (including NAGPRA), and the individual states of the United States of America.

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 DO-28, *Cultural Resources Management Guideline*, as well as the Draft Appendix X: Museum Firearms, Small Arms Ammunition, Artillery, And Munitions (still under review).

B. Roles and Responsibilities for Accessioning and Deaccessioning

1. Accountable Officer

The 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 Park'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 park 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.

2. 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.

3. 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.

4. Collections Advisory Committee

A multidisciplinary Collections Advisory Committee (CAC) reviews potential donations and makes recommendations on the merits of potential acquisitions weighed against the Scope of Collections for compliance, exhibitions, education, and research purposes.

Since 2017, all parks are required to establish a CAC. A CAC is required to review all proposed new accessions and deaccessions 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 the *NPS 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 *NPS 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.

V. USES OF THE COLLECTION

The main use of the Honouliuli National Historic Site museum collection is to fulfill the letter and the spirit of the 2019 John D. Dingell Jr. Conservation, Management, and Recreation Act by preserving and interpreting historic artifacts and archives associated with the incarceration of

Japanese American citizens, other civilians, and prisoners of war in Hawai‘i, as well as those associated with the impacts of war and martial law in the Hawaiian Islands during WWII.

The park’s museum collection may be used for exhibits, interpretive and education programs, research (conducted by NPS staff and non-NPS public), and other interpretive media with the approval of the designated Cultural Resources staff member. The governing consideration in the use of any museum object is the object’s physical condition and preservation thereof, and the collection as a whole.

In accordance with *NPS Management Policies* (2006), Chapter 7, the park will not exhibit Native Hawaiian disinterred skeletal or mummified human remains or photographs or replicas of them. There will be no display of grave goods or other objects if Native Hawaiians who are culturally affiliated with them object to such an exhibit.

Any and all uses of objects in the museum collection will be consistent with the preservation standards set out in *Director’s Order #28: Cultural Resources Management*. Consumptive or destructive use of museum objects will comply with the requirements and restrictions on such use detailed in *Director’s Order #6: Interpretation and Education* and *Director’s Order #28: Cultural Resources Management*. The use of reproductions is preferred to the consumptive use of original objects.

A. Conditions for Use

The following conditions for use of collections apply:

1. All exhibits or displays containing Honouliuli National Historic Site museum objects must have proper security and appropriate environmental and light controls to ensure their long-term preservation. Honouliuli National Historic Site museum management program and Cultural Resources staff reserves the professional right to rotate or remove museum collections when either base standards in a space are not met or when an object or objects show possible deterioration or other possible harm from exhibition.
2. Honouliuli National Historic Site objects will be available for scholarly research purposes that are consistent with the long-term preservation of the collection, subject to the guidelines outlined in *Director’s Order #28: Cultural Resources Management* and the museum’s operating procedures for access into the collection. Prior arrangements must be made with Honouliuli National Historic Site Cultural Resource Staff for access into the collection. No use of the collection will be permitted in the absence of a Cultural Resources staff member. Outside researchers who wish to use the collection must contact the Cultural Resources staff and submit a research proposal. The proposal will be reviewed by the Cultural Resources staff and considered on a case-by-case basis.

3. Honouliuli National Historic Site museum objects will not be used consumptively or in interpretive demonstrations without prior authorization. Any such uses must follow the guidelines set by *Director's Order #6: Interpretation and Education*.
4. Requests for consumptive analysis or testing of Honouliuli National Historic Site museum materials will comply with restrictions and procedures outlined in *Director's Order #28: Cultural Resources Management*.
5. Honouliuli National Historic Site objects may be loaned to qualifying institutions for exhibition or research use. No loans will be made to individuals. Institutions must meet minimal museum standards for security, handling, and exhibition of NPS museum objects. Sensitive materials may require additional conditions prior to loan commitment. Expenses related to the loan of museum objects, including shipping and insurance, will be assumed by the borrower.
6. Photographs of Honouliuli National Historic Site museum objects and archives can be made available to provide an indirect use of the collection for research and interpretation and education through publications, website, and exhibits. Honouliuli National Historic Site Cultural Resource staff reserves the professional right to deny use if copyright is in question or a known concern.

B. Restrictions

Restrictions may be placed on the publication of images or manuscripts in the collection if these materials are subject to copyright and this right has not been explicitly signed over to the National Park Service.

Museum management staff should consult with Tribal governments, Native Hawaiian organizations with a historic residency in Hawai'i, and traditional religious leaders about the terms and conditions for management of collections from Federal lands that have significance for these groups; and should consult with other indigenous and immigrant ethnic, social, and religious groups that have aboriginal or historic ties with the museum collection or lands of origin, and/or have traditionally used the museum collection. Objects in the museum collection shall be made available to persons for use in religious rituals or spiritual activities in accordance with 36 CFR Part 79, "Curation of Federally-owned and Administered Archeological Collections" and other bureau policies. Requests to borrow non-archaeological material for religious ritual or spiritual activities will be addressed on a case-by-case basis.

In accordance with the National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq), the Archaeological Resources Protection Act of 1979, as amended (16 USC 470aa-mm), the National Parks Omnibus Management Act of 1998 (54 USC 100701 et seq.), and NPS

Management Policies (2006) 4.1.2 “Natural Resource Information” and 5.2.3 “Confidentiality,” Honouliuli National Historic Site will withhold from the public sensitive information concerning: rare, threatened, or endangered species; commercially valuable resources; minerals; paleontological resources; archeological and other cultural resources; objects of cultural patrimony and sensitive ethnographic information; information provided by individuals who wish the information to remain confidential; and the identities of individuals (e.g. donors) who wish to remain anonymous. Inquiries of this nature will be referred to the park’s Freedom of Information Act (FOIA) and Privacy Act Officer for consultation and possible review.

All endangered, threatened, or rare plants and animals will be collected only when accidentally killed or when dead from natural causes. Collecting rare, threatened, or endangered species will comply with *NPS Management Policies* (2006) and will be in accordance with the provisions of the Endangered Species Act of 1973 (as amended) and will be strictly limited according to the applicable rules of the U.S. Fish and Wildlife Service and the NPS. Final disposition of type specimens will be determined at the Service-wide level and will adhere to recognized conventions established for specific disciplines.

VI. 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:

- As stated in the *NPS Museum Handbook* Part I, Chapter 2, Section J, the Honouliuli National Historic Site SOCS will be reviewed and updated at least every five years but can be updated more often whenever changed conditions clearly alter the mission of the park or when priorities in a specific collecting category have been met. Changes must be approved by the Superintendent.
- The Honouliuli National Historic Site CAC will be reviewed and updated to fill vacancies as needed.
- Staffing changes may also mandate a revision of the Honouliuli National Historic Site SOCS to restrict or otherwise alter the acquisitions policy. The park has a legal obligation to “preserve and protect” donations in perpetuity. If the park cannot meet a baseline level of care for its collection, acquisitions should be restricted accordingly.

Appendix A: Enabling Legislation

See Honouliuli National Historic Site Park Foundation Statement on file in Superintendent’s Office or on the park’s website: www.nps.gov/hono.

Appendix B: NPS Museum Collections

The Department of the 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.

[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:

- 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

Honouliuli National Historic Site's museum collections may be used for exhibits, interpretive and education 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 Honouliuli National Historic Site 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 for material research. 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 Honouliuli National Historic Site 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 museum collections and archives 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. The filming party is liable for any copyright infringement resulting from filming. 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. All filming, still photography, and audio recording is treated the same under the EXPLORE Act of 2025 (54 U.S.C. 100905), whether commercial, non-commercial, for content creation, by a student, or conducted by media for news gathering. To access collections that are not on public display, a request for access must be filed with the curatorial division.

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. 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.

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, 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 *NPS 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.

All park firearms and explosive ordnance have been rendered inoperable and inert.

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 uncatalogued 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 catalogued 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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