A STUDY OF HISTORIC PRESERVATION
IN THE NATIONAL PARK SYSTEM

By
Management Consulting Division
and
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Purpose and Objective

This study was begun with the intention of ascertaining the state of cultural resource preservation in the Service today and attempting to determine what is needed to be done to improve NPS preservation and management efforts as they relate to cultural resources in order that the Service's posture once again that of leadership in all phases of cultural resource preservation and management.

The objectives of the study were to evaluate the in-house NPS Cultural Resource Management activities to determine the effectiveness of the program in meeting the mission of the Service (System) in preservation of historic resources, possible program overlaps or voids, and if the program interfaces or coordinates with other activities. Areas to be reviewed were cultural resources planning and control; organizational structures; staffing, to include recruiting; budget; training, to include career development for the different professions; interface with other activities such as maintenance, natural resources and science programs; storage and curation of artifacts; and cultural resources inventories.

Method of Study

The study was conducted jointly by the Management Consulting and Cultural Resources Management Divisions. All regional offices were visited and key personnel in those offices were interviewed. We also interviewed a number of park superintendents, Service Center and Harpers Ferry Center managers and key preservation supervisors,
and all archeological center chiefs. Everyone appeared to be honest and objective in his assessment of the problems. We were especially impressed with the candor and thoughtfulness displayed by the key supervisory preservation personnel of the Denver Service Center of the Center's preservation program, and therein, discussions of its problems and failures.

Background

Traditionally the National Park Service has taken the development approach to the preservation of its cultural resources while most preservation organizations in the United States and in the international community have discarded this approach, viewing preservation as a continuous site operations process. The process is basically preventative maintenance based on the most modern analysis and the utilization of technical methods. This modern and generally accepted approach is being used in only two regions (NAR, SWR) and the archeological centers at present.

The development approach is expensive and not always in the best interests of historic resources. Such an approach requires the application of much money and the undertaking of major alteration, for its intention is to bring a structure to a level of full restoration. Concomitantly, the great majority of available funding is applied to relatively few resources, leaving many others lower on the priority list, to deteriorate, or, if they are lucky, to receive only superficial treatment.
Presently there are several centers in the National Park Service concerned with cultural resources preservation. They are: DSC, HFC, Conservation Laboratory; Western Archeological Center, Tucson; Southeast Archeological Center, Tallahassee; Midwest Archeological Center, Lincoln; Southwest Cultural Resource Center, Santa Fe; and the North Atlantic Preservation Center, Boston. Regional offices and some parks also provide technical support services for cultural resources preservation. In total, these centers provide the majority of the professional anthropological, historical, architectural and curatorial services for the National Park System. This includes curation, preservation and conservation of artifact materials, research studies, maintenance training, project planning, stabilization of adobe and stone structures, historical investigations, historic architecture and landscapes, remote sensing research, special programs such as underwater archeology, and environmental quality work.

There is, at least on the surface, much overlapping of effort and a concomitant waste of federal dollars. Often the centers and regional offices are in conflict with one another.

Most people we talked to expressed concern with the state of cultural resource preservation in the National Park System, and the resources (structures, sites, objects) in the Service's care. Many feel the Service has not kept current with preservation techniques and
philosophy, but have difficulty articulating courses of action necessary to bring the Service's preservation program into line with current accepted practices.

The individuals interviewed feel overwhelmed and are acutely concerned with their responsibility. The recently completed LCS lists over 70,000 structures. This number will probably double with the listing of sites (archeological, battlefields, etc.) to be undertaken soon. In addition, we are responsible for an estimated 10,000,000 objects.

Findings are organized by major problem areas so as to show more clearly the magnitude and scope of the problem and the effect upon normal Park Service operations.
Findings
The discussions the study team had with field, region and center personnel, all to a great extent, revolved around the Denver Service Center and its effectiveness. Our findings are essentially in agreement with the study of historic preservation in the Denver Service Center completed last year. The views expressed have been arranged topically.

Project Execution
Denver Service Center personnel appear to have arbitrarily expanded some projects in doing complete historic structure reports, history or archeological studies in excess of that required without consulting with appropriate regional and park officials. Rather than restricting the scope of their work only to that specified cultural resources personnel at the Denver Service Center often do a full and complete study. The resulting report has often been excessive and ineffective as a management tool with which to plan or draw up specifications due to its lack of specificity.

It was often said that many of the reports are slow, if ever, to be published with the reason being cited that there was no money left to publish the report after the project was completed. This seems to show a lack of planning and responsible action. Our observation is that too often this material is lost forever due to lack of archival concern by the Service Center. Many projects
exceeded the programmed monies and the attitude of DSC personnel has normally been that the park can come up with more money. There is an apparent indifference and often hostility on the part of DSC personnel when this is brought to their attention.

This failure to get Denver Service Center to respond can be laid in part at the door of the regions. The understandable reluctance on the part of Regional Directors to go to the mat with DSC on historic preservation matters is partially responsible. One region developed a reputation of being unable to get along with DSC, and when a new Regional Director was appointed, the then Director pointed this fact out to him and instructed him to improve relations with DSC. Relations may have improved, but the problems still exist.

**Quality Control**

There has been a lack of quality control exercised in the cultural resources activity. Cases of intrusion on the historical integrity of buildings is common with such things as electric lights, television cameras and fire and intrusion alarm systems openly and unnecessarily exposed to view and intrude on the historic scene. These intrusions have occurred when work is assigned to non-historical preservation personnel or to inadequately trained historical architects. A prime example is Castle Clinton, where modern lights are unnecessarily obvious; where blue marl, a modern crushed stone, was used on the
parade of this 1812 fort, where flashing was inadequate and resulted in leaks, where the shingles were put on wrong, etc. The specifications for Castle Clinton were done by an architect who had no training in historical preservation, and the project supervisors were equally untrained. Apparently qualified preservationists did not check the drawings and specifications.

Insensitive design and poor project execution resulted in unnecessary damage to the fabric of the Carriage House at Adams when a fire and intrusion alarm system was installed. The Dilworth-Todd House is another example of intrusive design of a fire detection system being placed in a structure despite the fact there was the example of sensitivity designed system in another house in the park. There has been resistance on the part of DSC personnel to respond to questions or criticisms in instances such as the above with an attitude displayed that "I am the professional and who are you to question what I do."

A goodly portion of the problem stems from crash programs and the strong pressure on DSC management to obligate funds. The DSC historical preservation professionals, many of whom are "semi trained," are freed to get work out and in the haste make faulty judgments that receive little or no review by their supervisors.
For some years now there have been newer technologies available to the preservationists—X-rays, mortar analysis, paint analysis, etc., and techniques are being further developed and improved continually. These techniques are not the be-all-end-all of preservation, but they are valuable tools that reduce the costs of preservation and at the same time contribute dramatically to more accurate assessments and restorations.

There has been a reluctance on the part of preservationists in DSC and in most of the regions to take full advantage of these tools. This can be attributed to several factors: 1) the new technologies require different approaches to obtaining information; 2) new equipment is required, which will save continuing needs, and trained personnel are needed; 3) technologies applicable to preservation are evolving rapidly and therefore difficult to keep abreast of them.

Younger historical architects, with formal training in historical preservation, have been more willing to accept these newer techniques, but they have to learn about these things on their own and virtually train themselves. No system exists at DSC to keep abreast of developing technologies or to encourage use of appropriate ones.

The problem in control of quality stems from two sources. One is that there is no apparent systematic check of studies, drawings and specifications by qualified senior professionals. The other source is the resistance on the part of some DSC personnel to accept criticism from Cultural Resources Management Division (WASO),
regional or park staffs. A prime example is the historic structures report on the fire and intrusion alarm systems proposed for Edison Laboratory. The preparers of this report initially failed or refused to deal with the criticisms of it made by the park, the region, and the Washington Office. The defects in the plan were corrected only after a concerted effort by park/region/WASO which was triggered by the mailing of bidding documents, a very late stage in the project to be making substantial corrections.

At other times the rush to obligate money on historic structures forces the acceptance of questionable proposed work. Specifications for detailing work on Fort Stanwix were questioned by the region because of future maintenance problems the design would cause. Denver Service Center resisted a change order citing the need to obligate funds. Predicted maintenance problems are now beginning to show up. A project supervisor untrained in historic structures made decisions damaging specifications on work on structures at Fort Larned, caused removal of historic fabric that should not have been taken away, affected the appearance of the structures, and cranked in future maintenance problems. These kinds of problems are legion in the Park System.

One failure in the quality of restoration that results from the development approach to preservation is that new evidence during a
rehabilitation project may negate assumptions made in the initial studies. The restoration of a historic structure has a continuity that requires the intimate involvement of the historical architect from the study phase through the restoration work, for protection of the historical integrity of the structure. A project supervisor who enters the work at the last stages is often not intimately familiar with the studies, and consequently would not always recognize new evidence when it appears.

Program Controls
Lack of program control has presented a problem to parks and regions. Denver Service Center has the reputation of not being responsive to parks or regions and fails to respond when questioned or criticized. Fredericksburg NHS asked for a historic structures report on the Chatham House to specifically identify those portions of the structure which could be used adaptively as office space. The report did not provide the information requested; it dealt entirely with the history of the occupants, events on the plantation, and a variety of associated subjects. Denver Service Center was told that the report did not meet the park needs as a management document and was worthless as a research document, but no changes were made.

It is very difficult for regions and parks to control, halt, or modify projects once they are designed, due to a lack of management
concern, a poor review process and a determination to obligate funds. As most of the cultural resources effort is treated as developmental work, this inflexibility of DSC leads to a major assault upon fabric by putting the Service into crash programs resulting in inadequate time for studies, skewed priorities, and uneven and inconsistent preservation work. This is not the fault of individuals, but rather of the system.

It was expressed that DSC doesn't follow agreed upon task directives (such as in Chatham previously cited). Some of this was caused by failure of management in the parks and regions in clearly and precisely defining in the directives the task to be accomplished. Many felt that DSC did not respond in a timely manner and the best way to get work done was to contract out historic preservation work.

The general feeling among those interviewed was that some DSC personnel show an apparent lack of sensitivity to the resource and are rigid in their approach once a project is designed and ready for contract. This is further aggravated by the fact that in many instances DSC accepts project overruns, both in time and money.

Part of the problem is the fact that the Service has attempted to look upon a person, if he has a degree in preservation discipline,
as being capable of making mature and professional judgments on all preservation matters, and not recognize the fact that effective cultural resource management requires an interdisciplinary approach, particularly among the four principal professions—archeologist, historic architect, historian, and curator. It was recognized at all levels of management as well as the preservation community that there needs to be a greater degree of cooperation and coordination between these disciplines for the best interest of the resources and that managers should understand the various preservation disciplines and the limits of each area of expertise.

Fiscal Responsibility

In the management of its historic resources, the Service also displays poor fiscal responsibility. Regional and WASO professionals with the knowledge and training necessary to make rational decisions relating to their use, display and preservation are often not consulted. The result has been the abuse of historic resources and in some cases, significant losses of these resources.

For the last several years the Park Service has been wasting large amounts of money on preservation projects and is continuing to do so. Preservation work has been accomplished on a crash basis with the work supervised by project supervisors unknowledgeable of construction techniques of the past. Bicentennial work at Fort McHenry was
designed, supervised and carried out by individuals with no knowledge of historic architecture or historic construction techniques. The project was well along before it was recognized that the proposed work was faulty. Luckily, the project supervisor realized the project was adversely affecting the resource before major damage was done, but work had to be undone, requiring an additional expenditure of money.

Sensitivity to Resources
One of the most voiced complaints was the DSC cultural resources personnel were not knowledgeable of the fabric of resources and conditions—geographic, human, environmental, and climactic—that the resources experience over a period of time. These investigators see a structure for only a few weeks out of a year and then prescribe for the treatment of the building. This lack of full understanding of the structures and the factors affecting it has led too often to reports that do not reflect reality.

It was a common feeling among managers and preservationists that those working on cultural resources needed to be nearer those resources. Unlike a modern structure where all fabric is new, a historic structure requires preservation of original extant fabric and the installation of new material and utilities into that fabric. To insure efficiency and preserve the integrity of the structure, the historical architect must be at or near the project.
Conclusions

In the analysis performed by the Management Consulting and Cultural Resources Management Division, the following conclusions were reached:

1. The Denver Service Center is a development/construction oriented organization. Many of the problems identified in the findings are the result of having the historic preservation function located in Denver Service Center and being perceived as a development related activity. NPS management does not recognize what the injury crash programs do to historic fabric.

This perception leads to programming full treatment for a structure when in many cases all that is needed is a limited amount of work to bring a structure to a maintenance level. It also leads to a feeling that architects can be interchanged between modern construction and historic fabric restoration. The problems with research reports not meeting management needs in relation to both content and timeliness is also a direct result of the perception of the need for full treatment. Historic preservation related reports should deal with those areas identified by management.

The present unsatisfactory situation can be solved by basing historic preservation on a maintenance approach. This can be done only if the professional services function is removed from the development orientation.
2. Having the preservation personnel in Denver results in a less than full understanding by the preservationist of a structure and the full factors affecting it, since he does not know intimately the climate and other environmental factors affecting it over a period of time. In addition, being situated in Denver, the preservationists are unable to give non-project (maintenance, minor repair, etc.) advice economically to the parks on an on-site basis.

The expense of travelling from Denver to the various sites is great, and with the constant effort to cut travel, the preservationists at DSC do not get to the site on which they are working frequently enough to understand completely the problem and to prescribe the correct treatment.

3. Presently the bulk of the Service's research historians are located in Denver where there are few research facilities. Many of the major projects require the research historian to visit the site he is researching and, generally, Washington, where the National Archives and Library of Congress are located, the two principal archives in the country.

Each time a historic research paper is written, a restoration is completed, or a significant museum object receives conservation treatment, a great deal of basic data is accumulated. Too
much of this material has been lost or misplaced because of the lack of an archival library or central repository where this information can be stored.

Recommendations:

1. The responsibility for historic preservation activities be transferred from the Denver Service Center to cultural resource centers. The centers would report to the Assistant Director, Planning and Development through a line officer on his staff. The historical architects, several historians, and the archeologists now assigned to DSC would be transferred to cultural resource centers. The people assigned to the centers would be base funded. The centers and the regions each would serve are:

   Boston - North Atlantic, Mid-Atlantic, National Capital Parks
   Atlanta - Southeast
   Denver - Rocky Mountain, Midwest
   San Francisco - Western, Pacific Northwest, Alaska
   Santa Fe - Southwest

The centers would be responsible for all preservation work funded through the development program, the preservation fund, and lump sum. At the discretion of the regions, the centers would do work funded from cyclic maintenance and regional reserves. There will be a need for specialists, but the workload at any one center
may not be great enough to support them. These professionals will be assigned to a center, but will be available Servicewide.

In addition, curators/conservators would be assigned to the centers to provide professional care of objects in the parks of the regions served by the center. Major preservation work on objects would still be done at Harpers Ferry where there will continue to be more sophisticated equipment and storage areas. Moreover, Harpers Ferry would continue to do all of the work for the National Capital Region. /See appendix for Analysis of Alternatives./

2. Transfer the Research Historians from the Denver Service Center to a duty station in the Washington metropolitan area under the line control of the Assistant Director, Planning and Development. /See appendix for Alternative Analysis./

3. Establish a permanent repository for all historic research documentation and basic data (drawings, photos, historic documents) derived from original research.

4. The Service will recognize the need for and strive to program a consistent amount of funds for preservation work each year.
CULTURAL RESOURCES MANAGEMENT DIVISION, WASO

Findings

The function of the division, as the Service's principle professional advisor and program manager in the multidisciplinary field of cultural resource management is to:

1. Develop and coordinate policies, standards, and programs pertaining to the preservation, study, development, and use of cultural resources in the System.

2. Monitor application of cultural resource policies and standards.

3. Review research and development needs related to cultural resources and recommend priorities.


5. Maintain the List of Classified Structures.

6. Evaluate qualifications of and recommend to management candidates for professional positions within cultural resource disciplines servicewide.

7. Establish qualification standards for personnel studying, preserving and managing historic resources within the System.

Despite this broad mandate the role of the division has been relatively limited. The major emphasis has been on policy and standards formulation, and review of GMP's and planning related research documents. Concurrently, a great deal of work has been
accomplished during the past two years in setting up the List of Classified Structures which identifies for the first time the scope of our preservation responsibilities and provides a base upon which planning and programming decisions can be made.

Design Review

The division only occasionally reviews preservation project documents. There is no system to provide the division with accurate status reports on projects by the Denver Service Center. Information has to be secured informally and a specific request made to review specific documents or plans. These requests have on occasion been ignored.

When comments are made they usually center on policy considerations, although the division occasionally questions the necessity of certain work or the quality of project proposals. These comments and suggestions usually meet a mixed reaction ranging from negative to welcome acceptance. The negative reactions have led to conflicts over matters that are clearly spelled out in the Management Policies. A recent example of this is the division's disagreement with the region over the Taft NHS General Management Plan. The division has not always received unequivocal support from higher levels in WASO.

Policy

The basic guidelines for historic preservation work in the Service are the Management Policies established by the Service.
The regions are often proposing and DSC is often executing projects that are in clear violation of Service policies. Those interviewed specifically cited unnecessary reconstructions, reconstructions through the subterfuge that they are interpretive exhibits, designs intrusive on historic scenes, and structures, inappropriate or unnecessary studies. When the Cultural Resources Management Division calls such violations to the attention of offending offices, either an unnecessary conflict results with wasteful further correspondence or the objection is ignored as in the study of the Franciscans for the preservation of the extant mission church at Tumacacori; the history of Cumberland Island when the project called for a study to preserve the Dungeness Ruins; and the recent study on Hampton Mansion that was unnecessary for the preservation of the structure.

In interviewing key and long experienced personnel, many expressed the view that the policies are adequate and clear, but many people in the Service either do not consult them or when they do, they don't use them properly. Some personnel have claimed not to have ever seen them.

Some of the personnel expressed the view that there was a lack of policy guidance from Washington, others, especially among the preservationists, expressed the view that there was a distinct lack of preservation leadership, and they looked to Washington to provide it. They were quick to qualify that they did not mean leadership in
the sense of routine administrative control, but rather the professional leadership that needs to be provided through policy guidance, quality control over the design and project execution phases, and in general representing the concerns of historic preservation. There is a virtual total lack of leadership in the curatorial field as the profession is not represented in WASO or even in all the regional offices.

Preservation leadership, many interviewees noted, is especially needed because one of the larger problems facing the Service is the apathetic attitude that exists toward preservation efforts by managers within the Service. This attitude stems in part from the rapid expansion of the System in the past decade which has put so many demands upon the manager, and he has too few resources to meet those demands. Today much of the feeling of apathy, which really borders more on wariness, from managers is caused by the apparent conflicting recommendations they receive for the preservation and management of cultural resources.

The conflicting advice can usually be ascribed to three causes:
(1) preservationists are saying the same thing, but are using different terms; (2) the differences in experience level or competence by the advisors; and (3) the rapidly changing philosophy about and increasing knowledge of preservation by the preservationists.
Philosophy of Preservation

At one time the Service enjoyed, and justifiably so, a reputation as the leading preservation organization in the country.

The Service has not kept up with current approaches to preservation or preservation philosophy. For example, as mentioned previously, we are still in the development mode which is primarily an architectural approach which repairs by replacing, while a less expensive preservation/maintenance mode which most organizations now follow strives to save as much fabric as possible.

Some sections of the Service are moving toward a preservation/maintenance posture, but they are trying to implement change in a conservative, unresponsive system. The tendency of the Service to feel that any architect can work on historic structures works against our better trained historical architects, who are aware of generally accepted preservation philosophy, and are striving to implement it.

The attitude, expressed by many in our regional offices west of the Mississippi, that our western structures do not at present require the sophisticated attention that is, at present, paid to historic structures of the east is a prevailing and pervasive attitude.

Conclusions:
The role of the Cultural Resources Management Division has been relatively limited given its broad mandate. It should be permitted to exercise the authority inherent in its role and function statement to provide the need for leadership expressed by those interviewed.
In conjunction with this there is a need to provide systems to enable the division to effectively implement and exercise its review and advisory functions. Examples of this need is the lack of a mechanism to provide the opportunity to review routinely DSC programming, planning and construction documents and plans and regional programs involving cultural resources; and the failure to fully include the division in the WASO budget review process.

Recommendations:

1. The Cultural Resources Management Division should exercise overview for preservation of historic sites, structures, and objects and specifically be responsible for:
   a. the establishment of policies, guidelines and standards relating to cultural resources management for sites, structures and objects.
   b. reviewing planning documents with a veto authority over plans which are in violation of policy with regard to cultural resources.
   c. reviewing Servicewide budget and multi-year programs for historic preservation as it relates to sites, structures, and objects.
   d. reviewing construction documents and contracting specifications relating to major historic preservation projects for adequacy and appropriateness.
e. setting standards for and monitoring the quality of work on 
historic preservation projects for sites, structures, and 
objects.

2. The Division will write specific standards to assure that cultural 
resource centers function in the proper professional manner with 
pArticular attention to seeing that:

a. a senior historical architect will review all construction 
drawings.

b. preservation centers will be equipped with scientific 
equipment—X-rays, microscopes, etc.—and train preserva-
tionists in their use.

c. one historical architect will be responsible for a preserva-
tion project from the study stage through to completion.

d. project supervisors will be adequately trained in the 
techniques of historic building construction.

3. Specific systems to carry out its review and priority setting 
functions should be designed to enable the division to carry out 
its role effectively.

4. Cultural Resources Management Division and the Division of 
Interpretation and Visitor Services should continue to work 
together to assure that programs of mutual interest receive the 
attention of both divisions.
Background

Over a decade ago, the Service committed itself to the principle of archeological centers at or directly associated with major universities. This approach has survived the test of time and the following anticipated benefits have been received:

1. Access to and use of university resources (laboratories, libraries, graduate seminars, symposia, etc.) at little or no cost to the Service;

2. Provision of a professional environment that allows our archeologists to maintain, enhance and develop professional knowledges, skills and abilities at little or no expense to the Service;

3. A talented and quickly trainable graduate student work force which can be employed under special student hiring authorities to increase the productivity of the Service's permanent, full-time archeologists;

4. Access to an employment of highly qualified professors on short-term academic appointment authorities to do professional studies; and

5. Joint appointments of qualified Service archeologists as faculty members with the resultant enhancement of professional qualifications.

The primary conclusion is that the archeological center concept is viable and productive, and should be continued and strengthened. The
study, however, did uncover some areas where changes or improvements can be made. These are discussed topically.

Findings

Ruins Stabilization

For decades archeologists have traditionally supervised the stabilization of prehistoric ruins. As time passed they became involved in stabilizing ruined and partially ruined historic structures, often with only fair to very bad results. The continued use of archeologists as program managers or project supervisors in ruins stabilization and in materials research and methods development, whether on prehistoric or historic ruins, is undesirable from several points of view. First, it is a waste of their professional training to assign them to this kind of an activity; second, their professional education does not prepare them with the background to carry out the work without extensive retraining; third, they lose the ability to function as professional archeologists; fourth, because they are in a professional job series, their grades have been inflated in relation to their actual duties and responsibilities. They are essentially performing technician level work at professional pay grades. This situation is most apparent at the Western Archeological Center, but it also occurs in the Southwest Region.
**Material Testing**

The Western and Midwest Archeological Centers are conducting material testing programs.

There is no servicewide policy on material testing. There are no established guidelines or procedures for reviewing, approving, coordinating and disseminating the results of the material testing program. There is duplication of effort due to the lack of control cited above. An example of these is in the area of adobe stabilization. Moreover, archeologists are supervising the program and they lack the discipline-specific knowledge to evaluate professionally proposals and results.

**Organization**

The centers at present report to the region in which they reside. There is little coordination of activities between centers. It is very difficult for the regional offices to provide the overview necessary to preclude duplication of effort (e.g., materials testing of adobe).

**Underwater Program**

In 1971, the view was that underwater archeological needs could be handled entirely through professional services contracts with educational institutions. Accordingly, management at the WASO level did not support the development of in-house capacity. Experience of the past seven years has shown that contracting alone will not result in an adequate underwater program. Currently, we are, however,
conducting a multidisciplinary study of the effects of inundation on archeological resources. The objective of the study is to determine the resource management strategies to be employed to conserve archeological resources impacted by water impoundments. In addition, we have done some work on shipwreck locations and identification in our coastal areas. But program commitment, standards, guidelines, continuity and organizational focus do not exist. Such a program is needed and it is felt that program objectives on a Servicewide basis can be met by a small professional cadre under the supervision of a qualified underwater archeologist located at a university with an on-going commitment to underwater archeology.

Remote Sensing

The remote sensing program was initiated in 1970 in support of the Chaco project. Beginning in 1975, the scope of its application was broadened to be Servicewide. The Remote Sensing Division of the Southwest Cultural Resources Center, Southwest Region, undertakes four activities: (1) it provides project specific support to the Chaco Project; (2) in response to WASO priorities, it provides support to special projects (e.g., the National Petroleum Reserve archeological survey in Alaska and BIA's Uranium Study) provided the project pays all costs; (3) provides project specific assistance to other regions
provided their projects pay all costs; and (4) under the direction of WASO, Cultural Resources Management Division, conducts a program of development of the application of remote sensing techniques to the discovery, inventory, management, and monitoring of cultural resources.

There is no overlap between this program and the one initiated about a year ago by the Denver Service Center and which is concerned with natural, not cultural resources. There is a need for coordination of the activities of the two programs to assure maximum use of equipment, compatibility of imagery, acquisition of imagery, and archiving of imagery.

The remote sensing program has emphasized the identification, inventory and evaluation of historic and prehistoric ruins with only a modest effort devoted to historic structures and detection of historic land use patterns. The program now needs to be expanded to embrace the full requirements of cultural resources management. The current program has been developed by one full-time professional assisted by one less-than-full-time professional. The program, if it is to be effective on a servicewide basis and if it is to expand to handle historic structures and land use patterns, will require a basic staff increase of five permanent full-time positions.
Conclusions

Ruin Stabilization

The Service is lacking an adequate ruin stabilization policy and guidelines. Currently the program is fragmented with parks and regions doing "their thing," with no consistency in the program. The Service is misusing some of its professional expertise in archeology as they are being used for ruin stabilization. More specifically the fabric preservation work they are doing more appropriately should be done by a fabric specialist or a person qualified in the architectural discipline with an understanding of fabric preservation techniques.

Material Testing

There is no Servicewide policy on material testing. There is no established guidelines or procedures for reviewing, approving, coordinating, and disseminating the results of the material testing program. This has resulted in duplication of efforts at the various centers. The Service has the expertise and facilities for an adequate program, but they aren't utilized.

Underwater Program

The Service does not have an underwater program, even though it is the lead agency in a cooperative, multi-agency study to determine resource management strategies for submerged cultural resources. Cultural resources on coastal plain, along river banks, on the shores of lakes and those submerged represent a special class of resource
management problems requiring similar and related resource management solutions.

Accordingly, a special unit associated with an appropriate university under a Memorandum of Agreement to handle the problems associated with identification, and development of resource management strategies for this class of cultural resources should be established. Such a unit would be highly specialized and would be servicewide in scope.

**Remote Sensing**

There is no overlap between this program and the one initiated about a year ago by the Denver Service Center and which is concerned with natural, not cultural resources. There is a need for coordination of the activities of the two programs to assure maximum use of equipment, compatibility of imagery and computer data base management systems, and archiving of imagery. There is a desperate need for adequate staffing for this activity as workloads have substantially increased.

It is essential to add one position in FY 78, two positions in FY 79, and two positions in FY 80 to provide a minimal staff capacity to handle the growing servicewide needs.

**Recommendations**

1. Ruins stabilization activities (i.e., work on fabric) should not be associated with archeological centers. Rather, archeological
centers should focus on the primary mission of archeological and anthropological studies and projects associated with and supportive of park interpretive and cultural resources management programs, including collections management. Archeological studies required prior to initiation of stabilization activities should be carried out by the archeological center, not by those assigned to fabric preservation.

2. Archeologists currently employed as ruins stabilization supervisors who cannot demonstrate current capabilities to perform as archeologists should be reclassified into the fabric preservation technician series and reassigned to an appropriate organization with either functional or line supervision (depending on the organization) coming from an historic architect.

3. Archeologists currently employed as ruins stabilization supervisors who can demonstrate capabilities to perform as archeologists, should have the option to take the next available archeological vacancy or to convert to a job series in the preservation technician series. It should be clearly understood, however, that once in the preservation technician series, it will be difficult to return to an archeological series.
4. The Cultural Resources Management function, WASO, and the Natural Science function, WASO, work out mechanisms for a coordination of the separate, but complementary remote sensing programs.

5. A Servicewide program should be initiated and a single, specialized underwater archeology unit should be organized and established as a cooperative studies unit associated with an institution that has a strong commitment to underwater cultural resources management.

6. Archeological centers will be organizationally a part of the cultural resource center serving the region in which it resides. The archeological center will retain its individual identity, but will report to the same person who will also be supervising the cultural resource center.
HISTORIC AND PREHISTORIC OBJECT RESOURCES

Findings

The National Park Service is custodian of a very significant collection of historical objects directly associated with the historical, natural, and recreation parks of the System, such as, George Washington's Tent, Booth's Derringer, Frederick Douglass' writing desk, Sandburg's pen, and LBJ's Lincoln Continental. A recent survey indicated more than 10 million individual objects with an estimated value of $150,000,000 are presently in the custody of over 260 parks and several archeological centers. The best current estimate in respect to the major categories of this collection is as follows:

- 1,000,000 Furnishings
- 500,000 American Indian Artifacts
- 1,000,000 Important historic documents
- 10,000 Oil paintings/sculptures/art
- 200,000 Firearms/weapons
- 100,000 Clothing/textiles
- 1,000 Vehicles
- 1,500,000 Natural history collections or items
- 1,500,000 Excavated historical artifacts
- 4,000,000 Excavated prehistorical artifacts

State of the Collections:

A large number of the Service's objects are stored under poor environmental conditions, are without adequate security, and are
deteriorating at an unacceptable rate. There is insufficient storage space in many parks for their museum collections. Some parks have deposited their collections with institutions or universities. In most cases there is no fee charged and the repository is not able to give adequate care to the objects. Many parks that house significant collections do not have sufficient funds for routine maintenance.

The collections are not adequately catalogued, with only an estimated 10% properly documented. There is inadequate property accountability exercised for most collections.

Sixty years of archeological excavation has resulted in a huge amount of significant artifacts which are improperly and inadequately stored in parks and archeological centers. Much of this material is uncatalogued. Research cannot take place until the material is properly stored, stabilized, and catalogued. This material represents a significant national resource desperately needing attention.

Care of Objects:
Until very recently the Service had no capability whatsoever to provide professional care for its object resources. With the establishment of the Division of Museum Services (HFC) in 1975, a beginning was made toward providing professional support to park managers for collection management and a place for scientific preservation of museum specimens.
There are not enough professionally trained employees in curatorial activities. Many parks with significant object collections do not have a curator on their staff.

Program Review

Authority for leadership in the curatorial field is dispersed and unclear. There is no professional office in WASO responsible for object resources. Some regional offices do not have a full time curator (PNW, SE, SW).

The existing regional curators are involved in many duties other than curatorial work, thus reducing their effectiveness.

As a result, there is no clear servicewide policy on many aspects of curatorial management or review of the adequacy of existing rules and guidelines.

- There is no policy relating to the differentiation between objects which ought to be in the individual park museum collection and those that should be in the archeological centers.

- There is no clear, servicewide policy on the growth or need of park museum collection.

- There is no central point of control to review proposals for contract conservation work.
Existing rules and guidelines concerning documentation of museum collections are not being followed.

Conclusions

The Service's curatorial program is fragmented with no clear policy direction or control. The program receives very little management attention or concern. It is inadequately funded and staffed.

Recommendations

1. A position of Chief Curator should be established within the Cultural Resources Management Division, and be given the responsibility to:

   A. establish policies, guidelines, and standards relating to the management of the Service's museum collections;

   B. review servicewide fiscal programming for museum activities to insure compatibility with NPS mission;

   C. coordinate the activities of regional curators, object conservators, and park curators;

   D. review proposals for major acquisitions of museum properties;

   E. review and advise management in regard to personnel selection for key curatorial personnel;

   F. monitor field curatorial operations and make recommendations to field personnel concerning management of museum collections.
2. The Service should embark on a full-scale effort to catalog all museum objects according to accepted professional standards.

3. The Service should require each regional office to have a curator on its staff.

4. The Service should expand the preservation staff for historic object conservation.

5. The Service should continue, on an annual basis, the intake curator program.

6. The Service should require each park to prepare a Scope of Collection Statement and have it reviewed and approved in the regional office.

7. The Service should encourage park managers to budget for cyclic maintenance of museum objects.

8. The Service should establish a central point of control to review and approve all proposals for contract conservation for work on museum objects.

9. The Service should support additional training in curatorial work at Mather and Albright Centers for the large number of NPS employees needing basic training.
10. Central repositories, similar to those at the Western, Midwest or Southeast regions, should be established to properly care for archeological collections and cooperative agreements with institutions be used wherever centers are not available. In general, archeological collections possessing research values should not remain in parks.
TRAINING & PERSONNEL

Findings

The cultural resource disciplines have been subjected to a career development and placement system designed for park rangers and park managers. The system does not meet the needs of the disciplines. What is needed is a system that will develop the discipline, specific knowledge, skills, and abilities of the cultural resource specialist; expand the breadth of their experience, provide for multi-disciplinary skills, and surface and train program managers.

It was recognized by cultural resource personnel, including those most knowledgeable in preservation at DSC, that there is no career development program and there is a concomitant lack of training in the cultural resource disciplines with historical architects and preservation specialists having the greatest need. Most historical architects at the Denver Service Center, one knowledgeable center preservationist stated, are "semi-trained," with DSC managers tending to feel that any architect can work on a historic structure. It is apparent that there has been a failure to recognize that historical architecture is a professional discipline separate from architecture and the role these specialists play in the preservation of these valuable resources.

There has been a failure on the part of the Service to recognize the fact that natural parks and cultural parks have different planning requirements. Natural parks are dynamic, and historical parks are
static. In historical parks the concern is for architectural conservation, urban or industrial settings, and non-renewable resources. Yet, the same person who plans for Yellowstone may well later be assigned to do a plan for Independence. This attitude about the interchangeability of planners has validity as long as the Service continues to look upon planning only in the use/development context and fails to recognize or consider the other half of the equation—resource preservation.

The Service has tended to look upon historians as the proper discipline to represent cultural resources on planning teams. The planning of historical and archeological areas has become a sophisticated art; historians have no training in design. Their proper role is to provide data on cultural resources and evaluate the significance of sites and structures.

The Service lacks qualified cultural resource planners and has been lax in recruiting them. This is evident in the area of use and design where planners are unable to consider properly ensembles of buildings, or get beyond the standard (house museum, quarters, administrative offices) adaptive uses for structures, in historical areas with fairly complex resources.
There is a lack of adequately trained managers in both the professional and managerial aspects of cultural resources and the Service does not have a training or recruiting program to alleviate this problem. Indeed, the Service has not recognized this lack as a problem. For example, Mather Training Center has dropped the Management of Historical Resources training course citing lack of identified need by the Service. In addition, there is no coordinator in the Service for training in cultural resources management.

There is a need for other disciplines in historic preservation, such as historical engineers, historical landscape architects, historical horticulturists, material scientists, soil scientists, conservators and varying craftsmen and construction supervisors. Under existing Civil Service regulations these job classifications do not exist at the present time, and therefore, it is difficult to identify and recruit representatives of these disciplines for Service work in historic preservation.

Maintaining currency in a professional discipline is a serious problem in the Service. It was felt that attendance at seminars and symposia, and time to pursue research and sabbaticals to update professional skills is needed. This is needed as we contract with universities, consulting firms, and research institutions which
require research qualified professional staff current with their disciplines to prepare adequate scopes of work, contract performance specifications, and to function as contracting officer representatives. When these conditions are not met, the quality, relevance and usability of our research product suffers.

Recommendations:

1. Cultural Resources Management Division should develop guidelines on types and extent of activities needed to keep preservationists current in professional knowledge and skills.

2. The Service in cooperation with other concerned agencies work toward establishment of job classifications for the historic preservation professions.

3. The Training Division should expand historical resource training for both managers and professionals.

4. Experienced cultural resource planners should be recruited by the Service and placed on the DSC regional planning teams.

5. Establish a career placement and development system specifically for the cultural resources management program.
I. Cultural Resource Centers

There are several options available to the Service in establishing line control over the recommended cultural resource centers. They are in order of preference,

1. Have the centers report to the Assistant Director, Planning and Development through a line officer on his staff, with a functional relationship to CRM, WASO. This line officer would exercise direct line control over the centers. Not only would this alternative have all centers (DSC, HFC, CRC) consolidated in one office, but also would eliminate possible conflicts between regions over work priorities and would permit easier control of special projects not related to specific regions (remote sensing, materials testing, etc.). Major disadvantages to this arrangement would be that preservation would still be in the same house with development which hasn't worked at DSC, and would not bring the work of the centers fully into the regional operational sphere.

2. Place the centers under the supervision of the regional director in whose region a center is located. There would be a functional relationship to CRM, WASO. This alternative would have the advantage of bringing preservation efforts closer to the regions' operational activities as they affect the parks. It would have the disadvantage of raising conflicts between regions over a center's work priorities.
3. Place the centers under control of the proposed Assistant Director, Cultural Resources Management, WASO. This alternative would have the distinct advantage of having the preservationists work in a more sympathetic atmosphere and would bring all major preservation activities under one roof in WASO. The disadvantage would be that the monitoring and control function of the CRM office would be diluted since the office would be less likely to criticize its own project execution efforts.

Alternative
Regional Preservation Centers: Remove the historical architects, historians, and archeologists from the Denver Service Center and place them in cultural resource centers in each regional office.

The center would consist of both project oriented preservationists and those who currently provide programming and review functions within the region. The center chief would report directly to the regional director,

Alternative to the Cultural Resource Center Concept
The cultural resource center concept is aimed at grouping those activities directly related to work on the fabric of cultural resources in a manner that allows the Service to program projects on the basis of need and high priority. It seeks to create
aggregates of professional and technical staffs in the field of fabric preservation into cost effective units. Such an approach is not without problems of coordination, scheduling and staffing, particularly with regard to highly specialized skills which will have to be located at one center and serve several centers if economy of operation is the goal.

An alternative to the approach of cultural resource centers would be to make each region self-contained with regard to program management and project execution capabilities in cultural resources management. If this were selected as the option, the issue of highly specialized activities, such as remote sensing, materials testing, underwater archeology, and curation and conservation of artifacts/collections would remain. The best solution to this issue would be assign specialized activities to particular centers and establish mechanism for these services to be used on a servicewide basis.

No matter how the Service organizes to deliver cultural resources management and project services, there will have to be a much stronger functional and control relationship between the Cultural Resources Management office in WASO and the field organizations executing the program.
### ALTERNATIVE A

**Bi-Regional Centers**

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<th>Responsiveness to Park Needs:</th>
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<tr>
<td>Response time may be slower than in regional centers since some centers will be working on a bi-regional basis.</td>
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<td>Will relieve regional office preservation staffs of project work so they can concentrate on programming, scheduling and professional review of preservation work and studies.</td>
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<th>Management Control:</th>
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<tr>
<td>More effective servicewide management control of preservation professionals.</td>
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<tr>
<td>The work program for the center would be more even than if personnel were assigned to each region.</td>
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<tr>
<td>Easier to monitor and control programming and execution of preservation work.</td>
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<th>Quality of Work:</th>
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<td>Greater concentration of the more experienced historical architects to provide a better training situation for the younger preservationists than if dispersed to nine regional offices (alternative B).</td>
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### ALTERNATIVE B

**Regional Centers**

| Closer to resource with more intense knowledge of local historic structural techniques, climactic conditions, and fabric of structures. |
| Travel costs would be further reduced. |
| Opportunity for regions to draw preservation personnel into non-project work, such as compliance problems or non-historic fabric work or programming efforts, etc., and away from work on historic structures. |

| Regional Director would have specific and direct control over preservation work. |
| Regional-wide scope of preservation work would tend to subvert putting professionals on the Service's priority work. For example, Service top priorities for a period of time may be centered in one region, but the region would be staffed to handle only normal workload. |

| Less of a multi-disciplinary approach because of lack of sufficient number of positions for disciplines, especially for personnel providing specialized analytic services such as a soils scientist and architectural conservator. |
Quality of Work (continued):

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<td>Justification for specialized and more sophisticated equipment would be greater because workload would be larger than in regional</td>
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<td>centers.</td>
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<td>Could better justify specialists since the workload would be sufficient.</td>
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<td>Would permit a better utilization of personnel.</td>
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<td>Greater opportunity to branch out into newer and more economic techniques of preservation.</td>
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II. Analysis of the organization placement of the research historians

The historians should be transferred to Washington and placed under the administrative control either of one of the preservation centers or the Assistant Director, Planning and Development, or of the to-be-established Assistant Director, Cultural Resources Management.

The historians will conduct general background studies for parks, historic structure reports on large complexes or fortifications, and the "quick and dirty" type history reports that are needed from time to time.

They would be base funded through an increased ONPS source. The nucleus of this source exists now in the funding for project types 31 and 32 work. This funding would be increased so that about $500,000 would be available to support the work of the research historians.

As indicated there are three options for the organizational placement of the research historians:

(a) Place the historians under the administrative control of the Assistant Director, Planning and Development. This alternative is the logical and preferred one if the preservation centers are placed under that office.
(b) Place the historians under the administrative control of one of the preservation centers, probably the one serving the North Atlantic/Mid-Atlantic/National Capital.

(c) Place the historians under the administrative control of the to-be-established Assistant Director, Cultural Resources Management. Since the unit will be doing studies for all regions, this would be the preferred alternative if the decision is reached to place the preservation centers under the control of regions.

If either alternative (a) or (b) is selected, it would have to be recognized that there will be a strong functional overview of the research unit by the Cultural Resources Management office.