

NATIONAL PARK SYSTEM ADVISORY BOARD  
Report of the Committee on Cultural Resources

12/Sept/79

During the April 1979 meeting of the National Park System Advisory Board in Boston, copies of a document reporting the outcome of the Harpers Ferry Conference on Cultural Resource Management, January 1979, were given to all Board and Council members. The discussion inspired by this report, limited by the fact that time to study the document was not then available, made it clear that a topic worthy of Board consideration existed. The subject broadly stated is: What is the National Park System's role in managing cultural resources in its custody and to what extent is the responsibility being effectively discharged?

In order to bring this matter before the Board, Chairman Burke requested Director Whalen and Emil Haury to develop a committee to address the question. On May 30, 1979, Chairman Burke appointed the following persons: Douglas D. Anderson, J. O. Brew, E. B. Danson, and Emil Haury, Chairman. The Committee was instructed to work closely with the Director and F. Ross Holland, Jr., Assistant Director, Cultural Resources. With Holland's assistance, the Committee met in Washington on August 2 and 3, 1979, all members being present except Anderson who was out of the country, but who contributed his thoughts in writing. Our work was expedited by a preliminary discussion between Holland and Danson in June 1979, and a conference with the Director on August 2 further delineated some of the issues. This report presents to the Board the sense of the Committee's deliberations and findings and may be considered to be final.

### Introduction

The recent (July 1979) National Geographic, totally devoted to our National Parks, captures the thoughts uppermost in the minds of people who either do or desire to visit our National Parks by using the subtitle: "The Best of Our Land." The natural and scenic treasures of America are magnificently portrayed and well-deserved attention is directed to the splendor of some of the world's greatest wonders. At the same time, the magazine recognizes the human factor, not only the value of the tracks Man has left in spinning the web of our national fiber, but also the press of the visitors on parks today. It is the former issue, the cultural face of the National Park System coin, that forms the body of this report.

Of the 320 units of the National Park System, 200, or over 60%, have been brought into the System because of their cultural values, either historic or pre-historic in nature. Almost all of the others, including the outstanding natural areas, encompass within their boundaries a variety of important cultural features. These cultural resources range widely in character, from the ruins and vestiges of the past, Pueblo Bonito and Russell Cave; monumental commemorative structures, the Statue of Liberty, the Washington Monument, and Mt. Rushmore; the battlefields where freedom was won, Saratoga, Gettysburg and Antietam, and the forts where peace was kept, Forts McHenry and Union; the heroic efforts of Man to conquer, Golden Spike, the Klondike Gold Rush, Kitty Hawk, and the C and O Canal; and the memorials to the leaders of the past, George Washington and Abraham Lincoln birth-places.

While the 200 cultural sites are fixed features on the map, immobile and silent, they demand constant attention, lest their worth which brought them into the System in the first place be eroded by time. The maintenance and management of the resources to preserve the integrity is a concern of the highest priority and demanding the skills and devotion of the best experts. There are at present 12,000 major structures in the aggregate of 70,000 buildings of all kinds on 521,000 acres of land which must be administered.

Associated with the buildings, the ruins of Indian houses and missions, the trading posts and ranches, and the homes of pioneers and presidents, is an enormous world of movable artifacts. These are almost numberless in kind and amount. They include the stone axes, the pottery jars, the lamps and guns, the plows and harnesses, the priceless paintings, book and documents that constitute the symbols of our actions and needs. Their preservation is a concern of the highest order, for, if lost, these resources cannot be replaced.

Few Americans and, indeed, many in the National Park System are not aware that the System is one of the world's largest stewards of cultural materials. It has over 15 million objects to care for and about 160 acres of exhibit space in its buildings to manage. The monetary value of the objects under the System's care can be conservatively set at 200 million dollars. That estimate is low when one considers that Peale paintings bring around \$200,000, and we have dozens of them, and single Hohokam pots sell for as much as \$18,000. A pre-historic wooden figure at Hawaii Volcanoes National Park has a current market value of \$500,000; the Hubbell collection is valued in excess of 2 million dollars. The Springfield Armory has the largest and finest small arms collection in the World, roughly 1000 pieces, appraised between 4 and 5 million dollars.

The dollar values, though staggering, are secondary to the historic values. For example, the weapon used in the assassination of President Lincoln is unique among others like it because of the role it played in that tragic event. Although many old books are to be found in libraries, the Adams library, intact as he left it, portrays the scholarly nature of President Adams and the breadth of his intellectual interests. The Hohokam pottery jar, used to enshrine the bones of a deceased person, illustrates a human act which reflects the thoughts of another people in another time. The connection between the object and the related event is the essence of the story it tells.

To safeguard these materials demands complete dedication to the curatorial process, encompassing the basic steps of accessioning, cataloguing, cleaning, conserving, computerizing, storing, maintaining, and providing security, while at the same time insuring accessibility for use in display and research.

#### Legislative Background

To establish clearly the role of the National Park System as the keeper of America's cultural resources, the Committee believes that a review of the legislative authority would be helpful to the members of the Advisory Board

and Council. This information is presented succinctly in Attachment 1. We extend thanks to Harry Pfanz and Ross Holland for excerpting relevant passages from existing legislation.

The staff paper notes, in sum, that the basic legislation gives the Secretary of the Interior and the National Park System the responsibility for the preservation of man-made resources. However, a problem exists with respect to legislation authorizing some individual units in the System. Quoting from the staff paper, we learn that:

"Such legislation is often directly applicable only to the site and not to particular resources within the site. For instance, in spite of the importance of its firearms collection, that collection is not mentioned in the act of establishing Springfield Armory N.H.S. The same applies to the recently acquired Maggie L. Walker N.H.S. The Act (PL 95-625) establishing this unit makes no mention of the house which is the principal feature of the site and to the hundreds of pieces of furniture and other objects that fill the house and will make it truly biographical.

"In the early decades of the century, following the passing of the Antiquities Act, many proclamations establishing national monuments made reference to the act and to its allusions to objects. In some instances acts and proclamations relating to specific monuments made particular mention of objects--those for Chaco Canyon and Navajo referred to relics, those for Fort Matanzas and Pipe Springs to objects, and Gran Quivira's warned against the collection of relics.

"In only a comparative few pieces of legislation relating to parks is there a particular mention of objects. The legislation relating to battlefields was pretty standard, only forbidding the removal of relics as one of the several prohibitions deemed necessary to the preservation of these parks. The establishment act for Theodore Roosevelt Birthplace and Sagamore Hill permitted the Secretary to acquire 'furnishings and other contents of the structures'. The act of authorizing the establishment of Hubbell Trading Post authorized the Secretary to acquire the structures and 'contents of cultural and historical value'. In the case of Longfellow N.H.S. the Secretary was authorized to acquire 'furnishings and other personal property'."

The Committee does not believe that attempts should be made at this time to modify existing legislative acts that brought individual units into the System but which lack specific reference to cultural objects. We do hold that in the future special authorization should be sought to manage objects contributing importantly to cultural monument or park scheduled for inclusion in the System.

A further note relating to attitudes within the National Park System toward natural national parks and historical national monuments deserves to be made. Ronald F. Lee, in his 1970 informative review of the events

leading to the establishment of the Antiquities Act of 1906, identifies the First National Park Conference in Yellowstone National Park in September 1911 as an important turning point in achieving the consolidation of numerous nationally significant historic places, then under the jurisdiction of the Department of Agriculture and the War Department, within the National Park Service. Authority to do that was embedded in the Reorganization Act of 1933, and with it Lee notes that the embryonic historic preservation program of the National Park Service was broadened and strengthened. But even with that accomplishment, 53 years elapsed before the distinction between natural and historical areas was to be fully made. The formal organization of the National Park System (for Service) was underscored by Secretary Udall's memorandum of July 10, 1964, in which the concerns of the System were to be Natural Areas, Historical Areas, and Recreational Areas, each with separate but interdependent management principles. This concept was written into law by Congress (Public Law 91-383) and approved by President Nixon in August 1970.

That law clearly establishes, philosophically at least, the parity of historical (cultural) resources, with the natural and recreational categories. Thus, in addition to other legislative mandates, the charge to the National Park System to care for cultural resources has been and is unambiguous.

#### Implementing the Responsibility

A review of the preceding legislative decisions places the responsibility for the care of cultural resources squarely and unequivocally in the lap of the National Park System. That the natural wonders of the System have dominated the attention of the staff and received the heavier budget support is entirely understandable. Historically, the recognition of the importance of cultural resources has been late in coming. The chief task the Committee recognizes now is to bring the management of the Culture side of the National Park System coin into harmony with its Nature side.

The Committee notes with satisfaction that awareness of this problem exists within the System. As evidence of that we cite the Harpers Ferry Conference on Cultural Resource Management in January 1979, the Pensacola Conference in April 1979, both preceded by a most useful document released in November 1977 called "A Study of Historic Preservation in the National Park System" and produced by Management Consulting Division and Cultural Resources Management Division. These reports have made the work of the Committee much easier because each one identifies problems and includes a series of recommendations which we reviewed in detail and drew upon.

As further evidence of this awareness, we wish to identify several recent actions for which the Director is to be commended: the appointment of an Assistant Director of Cultural Resources, authorization of the position of Chief Curator, and his declared support to move ahead aggressively in the area of cultural matters. We also take note of the fact that, broadly speaking, the cultural interpretive exhibits in Visitor Centers, as at Gettysburg, Tumacacori, Mesa Verde and elsewhere, are of high quality; that other avenues of disseminating cultural information are being used, for example, publication of more than 20 volumes under the aegis of the National Survey of Historical Sites and Buildings. The System is to be commended for its foresight and willingness to invest a substantial sum of money in developing a computerized List of Classified Structures as an aid to management.

However, we perceive a problem of major proportions. The System owns pickup trucks, cameras, typewriters, desks, files, all manner of modern hardware needed to further its goals, valued at about 67 million dollars. All of these things, although replaceable, are managed by more than 300 staff people. Balanced against that, only 48 museum curators servicewide are responsible for watching over and caring for irreplaceable objects valued at three times as much. Somehow, our priorities have become reversed.

The Committee supports the view that if full recognition of the National Park System responsibility in the area of cultural resources is made, the logical consequence will be improved top-level support, administratively and budgetarily; and given the fulfillment of these two conditions, efforts to achieve a higher degree of professionalism in staff will go far in insuring a successful cultural program.

### Recommendations

1. A review of the Organizational Chart of the National Park System reveals a possible explanation for the less than ideal care and concern about cultural resources. Leadership in the natural sciences rates a classification category of Associate Director, while the social sciences encompassing history, architectural history, anthropology, and archaeology are placed under the Associate Director of Management and Operations but only rate an Assistant Director. This arrangement is prejudicial to the social sciences. The separate but equal status of these disciplines is recognized in Public Law 91-383 and in the structure of our institutions of higher learning. The organizational downgrading of the social sciences in the System has the unhappy effect of making them rate second to the natural resources.

The Committee believes that the inequity of this situation must be recognized and that steps to equalize the rating of the natural and social sciences organizationally should be taken immediately.

2. A complex and vital problem in the National Park System concerns the principles under which it currently operates in managing activities in the cultural resources areas. Although standards and guidelines exist, the time seems right to review and upgrade procedures now in use. That review must recognize the necessity of and the steps necessary to achieve a higher degree of professionalism than now exists. The desirability of working for the National Park System must be enhanced so that the best qualified people will want to seek employment in the System. We believe that the quality of the personnel can be vastly improved if the recruiting process, the selection of personnel, and training process are overhauled.

Recruiting and personnel selection must identify those individuals with solid training in their respective disciplines, rather than having an overload of cultural resource management training, and those best suited by personality and temperament to work effectively with the National Park System team. Graduate School dropouts and others with subpar training are to be avoided.



Management should be sensitive to training in three areas: 1) the revitalization of established personnel by whatever process best suited to the responsibilities of the individual, 2) by providing opportunities within the System for wide-ranging Park experience and participation in specialized training courses outside the System, and 3) the training and development of employees in the rapidly growing field of historic preservation. Most of the historical architects are learning by hit-and-miss experiences on priceless structures.

3. With 200 cultural units, 15,000,000 objects, 70,000 structures to manage, the Committee recognizes the immensity of the problem of selecting properly trained staff.

In the early 1960s there were 68 curators to care for fewer cultural units and related collections though there are 48 curators on the staff today to manage the collections of 200 units. In short, the National Park System capability has been reduced. There is no way that the present staff can responsibly handle all the resources. In addition to this backward trend, the Committee notes the National Park System at this time has no cultural resources planners. The position of Chief Architect remains unfilled. It was only in 1979 that the Director appointed an Assistant Director of Cultural Resources in WASO and in March authorized the position of Chief Curator.

The Committee perceives wisdom in the concept of the organizational structure for cultural Resources but the implementation has lagged. The early filling of all positions authorized and the necessary supporting staffs will be the quickest way to have available a cadre to assume control, develop operational procedures, consolidate guidelines and standards, train others, and launch a positive program.

4. We believe that under the Chief Curator there should be Regional Curators whose professional responsibility would be to the Chief Curator but administratively answering to the Regional Director. The Regional Curator's principal responsibility must be recognized as being in preservation and that his or her talents and energies should not be diluted by participation in interpretive programs.
5. The Committee enthusiastically endorses the concept of regional or bi-regional centers, not only for the basing of specialists whose professional services are thereby close to the resources, but also to meet the special requirements of specimen protection imposed by environmental factors. The problems of artifacts derived and stored in a humid environment are not the same as those from an arid setting.

At the same time, conservation activities could be developed that are best suited to meet regional and climatic problems, thereby avoiding duplication of capabilities. In other words, the professional service geared to the specific needs of a region should be close to the source. Specialist services which are equally useful in all regions should be developed in one center only which would serve as a base for assistance where needed.

6. The Committee endorses the recommendations made by the Harpers Ferry Conference with respect to the reassignment of certain positions from Denver Service Center to other places. Specifically these are:
  - 1) Research historians should be in Washington.
  - 2) Historical architects should be stationed in regional or bi-regional preservation centers and thereby closer to the resources in which they are working.
  - 3) The DSC archaeologists should be assigned to archaeological or regional centers closer to the problems of their concern.
7. The Committee senses that errors in choices of personnel, i.e., finding the best qualified person for a specific job, could be reduced by broader consulting on the part of top management inside the National Park System and outside where appointees in the field of cultural resources must cooperate extensively with institutions and persons in the private sector.
8. The Committee recommends that the Director consider the problems of career advancements of staff members in the cultural area. Thought should be given to the professional development of the personnel as well as to a possible geographical reorganization of the cultural staff.
9. The Committee senses that avenues of communication between representatives of division in Cultural Resources and between planners, managers, researchers, interpreters, and administrators are not fully exploited. As a result, duplication of effort, working at cross purposes and misunderstandings occur. We believe that there should be a renewed dedication to keeping the lines of communication open and that the efforts to do so will lead to increased efficiency and improved morale in the staff.
10. In the area of collection management, the Committee takes the position that acceptable procedures will be developed between the Chief Curator and Regional Curators to achieve system-wide uniformity in the processing of material culture. This includes all basic steps from acquisition to computerizing the data. Within the legal framework, policies should be developed regarding the mode of storage, culling, disposing of by gift or loan, destruction or selling, security and maintenance of stored materials, place of storage, etc.

The Committee wishes to emphasize especially in the area of data control and retrieval that early attention be given to the adoption of a National Computerized Inventory of collections. A model for this exists, developed by Western Archeological Center of the Arizona State Museum. Except for inevitable refinements in the system, there would appear to be no further need to delay the process by calling together more large-scale conferences.

The Committee is unanimously opposed to the concept that collections are of two kinds: a) those materials which satisfy research and constitute the bulk of the System's holding; and b) those materials which are of exhibit quality. In the field of Museology there is no rational basis for making this distinction and, most of all, to set up separate systems for

the management of materials. There can only be one collection. All materials, uniformly treated, constitute the resource which fulfills research needs and from which exhibit materials are drawn. Exhibit needs should be fluid in response to changing interpretive emphases and no one can predict today what specimens will be required to support in the best way possible the story being told tomorrow.

11. For both the stationary resources, as buildings, statues, etc., and for the stored and exhibited collections, the National Park System must develop a monitoring system. The physical resources should be checked periodically to ascertain the condition and to determine the causes of deterioration if that is taking place. The effect of acid rain, pest infestations, insecure footings, corrosion, and a host of other deleterious forces are continually at work. The present practices in the areas of preservation are not consistent with the accepted policies. The reason for this may be identified as: a) a lack of professionalism or professional capabilities in staff; and b) budget limitations. The tragedy of the status quo is that conservation efforts are going in different directions and oftentimes more harm than good is being done.

Although base line information exists for structures, from which an effective preservation program can be planned, the same kind of information does not exist for objects. The Committee recommends that that gap be corrected. The effect will be to spur the development of management strategies designed to do the least damage to resources in the process of preserving them.

12. The Committee notes with satisfaction that an initial positive step in inventorying cultural resources has been taken with the development of a List of Classified Structures. We recommend extension of this principle to include a List of Classified Sites. As a useful managing document in its own right, it would also serve as a bridge in linking cultural resources data to natural resources. The General Management Plan for Yosemite may be cited as an example of that.
13. The Committee perceives a weakness in procedures dealing with the accountability of personnel responsible for cultural resources. Two examples will suffice:
  - 1) A Superintendent may authorize certain modifications of terrain, minor road-building, tree removal, etc., without first determining if damage to resources may result. Destruction of resources in the course of these activities carries no penalty.
  - 2) Information from the field either as to the scope of collection, and the maintenance of them, is not centralized anywhere. The total picture is not available.

We recommend that budget provisions be made to acquire comprehensive knowledge about collections so that management strategies can be wisely drawn.

14. The Committee sense that National Park System planners are not always fully sensitive to the cultural resources, to the historic integrity of



properties for which they may be developing landscaping, or other plans. The guiding principle that all buildings, landscaping, etc., should be so designed as not to conflict with the spirit of the property people have come to see should be assiduously followed.

15. We perceive problems related to complying with Section 106 requirements of the National Historic Preservation Act. The present system encompasses too many bureaucratic obstacles and is unreasonably demanding of staff time and energy. The phrase we often heard from the staff is, "We're managing paper, not the resource." We suggest that Section 106 process be reviewed with the eye to simplifying it without reducing effectiveness.
16. The Committee finds that the System continues to be plagued by antagonism against research. This is reflected in the budget-making process at the highest levels and at the Park or Monument level, where Superintendents elect to close the door to qualified investigators. The utility of knowledge about resources, even if only to help management, needs no defense or explanation. A change in attitude seems long overdue.
17. No matter how well material collections are cared for, the preservation of objects is only the first step toward their effective use. Collections constitute a reservoir of research material; they may be drawn upon for exhibit specimens. But the full significance is realized only when all available information about objects, historic structures and sites, their functions, and the events connected to them are made available to the specialist and to the public at large. The means of achieving this is through publication.

The Committee views with dismay and concern the reduction, if not the elimination, of the publishing program of the Cultural Resources Division. We recommend the early resumption of a publication program commensurate with the importance of the subject matter.

18. Continuing studies of cultural resources, whether archaeological or historical, are producing a vast body of new knowledge. These studies are being conducted within the System by staff or by outside investigators either under contract or by other arrangements. Although policies exist with respect to the archiving of the protocols, field data, photographs, drawings and maps resulting from these activities, there are indications that all such materials do not always find their way into National Park System depositories for safekeeping. And even if they are properly deposited, the records are not always safeguarded and maintained in an acceptable manner. The Committee recommends that this problem be reviewed and that the necessary steps be taken to preserve and protect these irreplaceable sources of information in a systematic way.

#### Concluding Remarks

Every member of this Committee has long entertained the hope that nationally we could develop a program and an image in preserving historic and pre-historic resources equal to what is being done in other countries. The United States lags far behind Great Britain, France, Italy, Egypt, and Mexico, to name a few, in this respect. The National Park System, among all the land-owning agencies in our government, is in the best position to show the way.

The diversity of properties it manages and its depth of experience are unmatched. Furthermore, its legislative base to act is stronger than is that of any other agency. The hope of achieving an even brighter image in the field of preserving our cultural heritage rests with the National Park System.

The Committee apologizes for the excessive length of this report. The complexity of the subject lends itself to no lesser treatment.

If the recommendations embodied herein are effective in calling attention to existing problems in the System, the Committee will feel rewarded. If the recommendations lead to positive and corrective actions resulting in the improved management of cultural resources at all levels, the Committee will feel that its efforts have been doubly rewarded.

If, however, the Committee's efforts should be embalmed in the files under the heading of "Reports Received," we can only see our involvement in this effort as a useless exercise.

Douglas D. Anderson

John Otis Brew

Edward B. Danson

Emil W. Haury, Chairman

12 September 1979

Attachment No. 1

BASIC LEGISLATION

Antiquities Act of 1906 (PL 34-209)

This Act provides punishment for those convicted of appropriating or damaging prehistoric resources including objects.

Its Section 2 authorizes the President to declare historic landmarks, structures "and other objects of scientific interest" on government owned or controlled land to be national monuments. It authorizes the Secretary of the Interior to accept the relinquishing of tract containing such objects.

Section 3 authorizes the Secretary to grant permits to qualified institutions to gather objects of antiquity for study and preservation.

This Act provided the authority for the establishment of numerous national monuments containing nationally significant cultural resources.

National Park Service Act of August 25, 1916 (39 Stat. 535)

This Act created the National Park Service and includes the preservation of objects in the Service's mission. The fundamental purpose of the Service's parks, monuments and reservations, according to the Act is:

To conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for future generations.

The term "objects" here appears to be intended to be applied in a broad sense including structures as well as movable artifacts. Although sometimes forgotten, the above continues to be the fundamental statement of the justification of the existence of the Service and provides basic guidance for the management of the Service's resources.

Historic Sites Act of 1935 (PL 74-292)

This Act declares that "it is a national policy to preserve for public use historic sites, building and objects of national significance for the inspiration and benefit of the people of the United States."

In order to implement this policy the Secretary of the Interior, through the National Park Service, was given the following duties and functions relating to historic objects:

- a. To secure, collate and preserve data of historical and archeological sites, buildings and objects.
- b. To survey historical and archeological objects to determine which possess exceptional value as commemorating or illustrating the history of the United States.
- c. To do research relating to objects to get accurate information on them.
- d. To acquire property for the purpose of the Act.
- e. To contract and make cooperative agreements to protect, preserve or maintain historical or archeological objects.
- f. To restore, reconstruct, rehabilitate, preserve and maintain objects of national historical and archeological significance and establish and maintain museums in connection with them.

By Reorganization Plan No. 3 of 1950 (69 Stat. 1261) the Secretary was authorized to transfer the above powers to other agencies. Therefore, some of the functions and duties are shared with other agencies, particularly with the Heritage Conservation and Recreation Service.

#### National Historic Preservation Act of 1966 (PL 89-665)

This Act gives the Secretary of the Interior authority to expand and maintain a national register that includes "objects significant in American history, architecture, archeology and culture" and to institute a grants-in-aid program for the states and the National Trust.

Section 106 of this act provides that Federal agency heads must take into account the effects of Federal undertakings on cultural resources, including objects, before approving the expenditure of funds.

Section 201 establishes the President's Advisory Council on Historic Preservation. By definition the term historic preservation as used in this act refers to objects and other cultural resources.

The Act broadens the scope of the Historic Sites Act to provide for the preservation of cultural resources having other than National significance.

#### Executive Order 11593 - Protection and Enhancement of the Cultural Environment

This order states that it is the policy of the Federal Government to provide leadership in the preservation of historic properties, and they will administer

their properties in accordance with this policy, that agencies will direct their policies, plans and programs to this end, and that the Advisory Council will institute procedures to see that Federal policies contribute to the preservation of non-Federally owned resources including objects. It provides for an inventory of cultural properties, including objects, and requires that qualified objects be nominated to the National Register. It instructs Federal Agencies to inventory and care for such properties. It instructs the Secretary of the Interior to encourage, assist, expedite, and advise and review in the implementation of this Executive Order.