



*Invited Feature*

## **Integrating cultural resources and wilderness character**

By Jill Cowley, Peter Landres, Melissa Memory, Doug Scott, and Adrienne Lindholm

**Abstract:** Cultural resources are an integral part of wilderness and wilderness character, and all wilderness areas have a human history. This article develops a foundation for wilderness and cultural resource staffs to continue communicating with one another in order to make better decisions for wilderness stewardship. Following a discussion of relevant legislative history, we describe how cultural resources are the fifth quality of wilderness character. Examples of how cultural resources in wilderness are being managed in a variety of parks include working with tribes to manage ethnographic resources in wilderness and using the Minimum Requirements Analysis to determine the appropriateness of historic preservation actions and activities. The article closes with three recommendations to help parks address managing cultural resources in wilderness in the future.

**Key Words:** archaeological resources, cultural landscapes, cultural resources, ethnographic resources, historic structures, wilderness, wilderness character

### **Introduction**

Cultural resources are an integral part of wilderness and wilderness character. Not all those involved in the preservation and appreciation of wilderness agree with this statement. Varying perspectives derive from a basic difference in belief about the relationship between humans and the nonhuman world—whether or not humans are a part of nature. For some, wilderness means pristine nature and the absence of human modification, where the presence of ancient dwellings, historic sites, or other signs of prior human use degrades wilderness. For others, wilderness is a cultural landscape that has been valued, used, and in some areas modified by humans for thousands of years ([fig. 1](#)). Reconciling these perspectives can be difficult.

To foster this reconciliation, the National Park Service (NPS) National Wilderness Steering Committee (now the Wilderness Leadership Council) stated that “National Park Service policies properly and accurately incorporate cultural resource stewardship requirements into the management standards for wilderness areas” (National Wilderness Steering Committee 2002). Likewise, in her 2011 draft white paper, Laura Kirn (National Park Service, branch chief, Anthropology, Yosemite National Park) discusses the philosophical perspectives as well as agency practices and implications of recent court cases that have led to what is perceived as a divide between cultural resources and wilderness. She notes, however, that according to historical research and policy, the two camps need not be divided.

Our position is that cultural resources—archaeological sites, ethnographic resources, cultural landscapes, and historical structures and sites—are components of wilderness areas and may contribute positively to wilderness character. In addition to preserving ecosystems, wilderness helps us understand human use and value of the land over time. One of the fundamental purposes of cultural resources is to promote multiple views of history, and wilderness can also be valued from multiple viewpoints.

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For example, a wilderness trail may reflect centuries of use by hunters, traders, miners, settlers, and travelers; today this same trail is used by wilderness visitors and represents a merging of past and present. Ecologically, while past human presence may not be apparent on a landscape, “the legacies of historic land-use activities continue to influence the long-term composition, structure, and function of most ecosystems and landscapes for decades and centuries after the activity has ceased” (Wallington et al. 2005; also see Foster et al. 2003). All wilderness areas have a human history.

In this article, we offer a perspective that promotes human history as integral to wilderness. Specifically, our intent is fourfold: (1) to enhance mutual understanding and respect between the cultural resources and wilderness communities; (2) to review relevant legislation and policy, the concept of wilderness character, and Minimum Requirements Analysis as they relate to cultural resources and wilderness; (3) to provide park examples of how cultural resources are being managed within wilderness; and (4) to recommend future actions. Several important related topics are not within the scope of this short article. We defer to others to provide legal responses to recent court cases that have raised questions about cultural resource management in wilderness (e.g., *Olympic Park Associates v. Mainella* [2005]). We do not offer specific tools to reconcile difficult cases; rather, our purpose is to develop a foundation for wilderness and cultural resources staffs to talk with each other and to make better decisions that respect all park values.

## **Legislative history**

Wilderness legislation and legislative history strongly support integrating cultural resources with wilderness. The initial 1956 version of the Wilderness Act specifically listed units of the National Park System within which wilderness was to be designated. This list included Shenandoah (Virginia) and Great Smoky Mountains (Tennessee and North Carolina) National Parks, which have a history of extensive habitation by settlers, and Mesa Verde National Park (Colorado), with its abundance of archaeological resources. The 1964 Wilderness Act includes historical value in the list of associated

wilderness values, and explicit in Section 4(a)(3) is that nothing in the Wilderness Act should lower the standards of preservation of the 1916 National Park Service Organic Act, the 1906 American Antiquities Act, and the 1935 Historic Sites Act. Further, the legislative record and wilderness acts subsequent to the 1964 act clearly indicate congressional intent to include cultural resources as part of the overall wilderness resource.

The 1976 Wilderness Designation Act established wilderness areas in a number of national park units and included “historic preservation” in the list of wilderness values and opportunities. Bandelier Wilderness, in Bandelier National Monument (New Mexico), was established by this 1976 act, partly to protect the archaeological resources occurring therein. The 1994 California Desert Protection Act added significant acreage to Death Valley National Park, establishing about 91% of the park as wilderness and directing the park to protect and preserve “historical and cultural values of the California desert associated with ancient Indian cultures, patterns of western exploration and settlement, and sites exemplifying the mining, ranching, and railroading history of the Old West.” Many resources related to these themes are located in wilderness.

In addition, national wilderness advocates like the Wilderness Society, who worked closely with members of Congress who championed the Wilderness Act, had a fundamental commitment to the standing of historical and cultural features among the purposes for which wilderness areas were established. Their understanding of wilderness included both the value of specific cultural features protected within a wilderness and the cultural significance of the overall environment of the wilderness (Zahniser 1956).

## **The Wilderness Act and the National Historic Preservation Act**

Wilderness and cultural resources are protected and preserved by federal legislation, primarily the 1964 Wilderness Act and the 1966 National Historic Preservation Act (the NHPA), as amended, respectively. Both acts share similar reasons for protecting wilderness and cultural resources. The Wilderness Act states that wilderness is established to preserve it from “an increasing population, accompanied by expanding settlement and growing mechanization.” Similarly, the NHPA states that cultural resources need protection from “ever-increasing extensions of urban centers, highways, and residential, commercial, and industrial developments.” Neither law states that it trumps the other, and thus federal agencies must equally uphold both laws and the values they embody.

Park examples clarify this relationship. Bandelier National Monument balances the enabling proclamations and legislation for the monument and the NHPA, which call for protecting archaeological resources, with the 1964 Wilderness Act and the 1976 Wilderness Designation Act designating the Bandelier National Monument Wilderness. Archaeological resources in the wilderness are being degraded by erosion, and the park is pursuing ecological restoration in wilderness to slow erosion and protect cultural resources (National Park Service, B. Judy, chief of Resources Management, Bandelier National Monument, personal communication, 5 July 2011; National Park Service, S. Stutzman, wilderness coordinator, Intermountain Region, personal communication, 5 July 2011; Sydoriak et al. 2000). The system of backcountry trails constructed by the Civilian Conservation Corps (CCC) in the 1930s in Chiricahua National Monument (Arizona) ( [fig. 2](#) ) is contained in the Chiricahua Wilderness ( [fig. 3](#) ) and also within the monument-wide historic district. These trails, with their historic retaining walls and other related historic structures, are considered to be part of the area’s wilderness character because they were an integral part of the landscape for many years prior to wilderness designation (National Park Service, J. Curtis, chief of Facility Management, Chiricahua National Monument, personal communication, 5 July 2011). The trails and related structures are being maintained to protect their historic character and wilderness character (National Park Service, S. Stutzman, wilderness coordinator, Intermountain Region, personal communication, 5 July 2011).

If cultural resources are specifically mentioned in wilderness legislation as a reason for the area's designation as wilderness, those resources can be included as part of the area's wilderness character. For example, some mining structures in Death Valley Wilderness may now be considered part of the character of this wilderness as a symbol of past human relationships with the land (National Park Service, C. Callagan, wilderness coordinator, Death Valley National Park, personal communication, 5 July 2011). If cultural resources are not specifically mentioned in wilderness legislation, the park, responding to the National Historic Preservation Act, may still preserve those resources and consider them an integral part of wilderness character. For example, Olympic National Park's wilderness legislation does not specifically address cultural resources, but the park's general management plan is purposeful in including management of cultural resources in wilderness (National Park Service, R. Scott, natural resource specialist, Olympic National Park, personal communication, 8 August 2011).

## **Cultural resources and wilderness character**

The article [“Using wilderness character to improve wilderness stewardship”](#) in this volume describes the development and use of five qualities of wilderness character that are tangible and link local conditions and management directly to the statutory language of the Wilderness Act. Four of these qualities (natural, solitude or primitive and unconfined recreation, undeveloped, untrammeled) apply to every wilderness regardless of size, location, agency administration, or any other attribute, and apply to the entire area within a wilderness. The fifth quality, *other features*, is based on the last part of Section 2c, “Definition of Wilderness,” in the Wilderness Act, that a wilderness “may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.” This fifth quality, unlike the other four, is unique to an individual wilderness based on the features that are inside that wilderness, and these features typically occur in specific locations rather than throughout the entire wilderness. Cultural sites clearly fit within this fifth quality of wilderness character because they are tangible features that have scientific, educational, scenic, and historical value. The historic structures in Death Valley Wilderness that are discussed above, for example, would be included in this fifth quality.

All five tangible qualities of wilderness character combine to form a setting that is unique to each wilderness, and this setting may confer important values that are not directly part of wilderness character, but are derived from this setting. For example, aspects of cultural resources, such as spiritual values, traditional practices, and traditional and historic stories (Cronon 2008), are important and vital for understanding culture and place, but are purposefully not integrated with wilderness character for several reasons. First, they typically derive from a time before the Wilderness Act and the concept of wilderness character. Second, they may not be tangible, and should not be forced into such a mold. Third, they may be closely held and cherished, and not meant to be shared with others.

Whether historic structures, sites, and landscapes in wilderness should be preserved, left to molder, or removed continues to be debated. “It is vital for local wilderness staff and cultural resources staff, using both the Wilderness Act and cultural resource protection laws, to work together and develop a common understanding” (Landres et al. 2008) of how historical resources should be managed. Section 110 of the National Historic Preservation Act requires that the National Park Service survey and inventory all historical resources, including those in wilderness, and Section 106 requires federal agencies to consider effects of actions on historical resources. National Park Service policy states that potentially eligible historical resources will be managed as if listed on the National Register of Historic Places (the Register) until they are determined not to be eligible. Register status influences decisions about whether or not cultural resources in wilderness are actively preserved. This decision may also be influenced by the location, visibility, and interpretive potential of the resource. For example, in the recommended wilderness in Dinosaur National Monument (Colorado), the park

decided to stabilize a wilderness cabin because of its interpretive value (National Park Service, M. Risser, superintendent, Dinosaur National Monument, personal communication, 5 July 2011; National Park Service, W. Prokopetz, chief of Resources Management, Dinosaur National Monument, personal communication, 5 July 2011), even though it was determined to be ineligible for the Register.

A number of parks are developing a wilderness character narrative that describes what is unique and special about the area (e.g., Lake Clark National Park [Alaska], Gates of the Arctic National Park and Preserve [Alaska], Everglades National Park [Florida], Guadalupe Mountains National Park [Texas]). These narratives integrate historical and ethnographic resources and values with wilderness character, setting the context for planning and decisions about wilderness stewardship. For example, at Lake Clark National Park and Preserve, the planning area for the General Management Plan Amendment (which also meets the requirements of a Wilderness Stewardship Plan) includes hundreds of known cultural resources, thousands of Dena'ina and Yup'ik place-names, and innumerable unknown and undocumented cultural resources. These cultural sites illustrate the significant relationship of past and present people to this area. The wilderness character narrative describes some historical cabins and archeological sites as part of the five tangible and measurable qualities of wilderness character that provide the setting from which additional cultural values are derived. Park staff felt that the most important of these is the connection the Dena'ina people have to Lake Clark Wilderness and the role it has played in shaping the Dena'ina culture. The park chose to include an essay at the end of the narrative that recognizes and celebrates this vital connection.

### **Cultural resources management and minimum requirements analysis**

The Minimum Requirements Analysis process can determine whether a historic preservation action is necessary and appropriate in wilderness, and if so, determine the minimum activity to accomplish that action. The analysis must consider different potential impacts on wilderness character of different methods for accomplishing a project (National Park Service, R. O'Neil, Plateau District ranger, Zion National Park, personal communication, 5 August 2011).

Types of equipment and method of access to the project site are two aspects of historic preservation projects that may need to be modified for work in wilderness. For example, the Taylor Creek cabins in Zion National Park (Utah) contribute to interpretation and understanding of pioneer use and occupation in what is now wilderness. Preserving this historical resource required structural stabilization of a cabin and a corral, and fuels assessment and clearing understory fuels around structures. A Minimum Requirements Analysis determined that the use of hand tools (including historical and pre-contact tools), a small work crew, and use of local resources (dead trees within 100 meters [305 ft] of the site) were the minimum activities (National Park Service, S. Horton, chief of Cultural Resources, Zion National Park, personal communication, 5 July 2011; National Park Service, S. Stutzman, Intermountain Region wilderness coordinator, personal communication, 2 August 2011). In the recommended wilderness at Arches National Park (Utah), preservation of a historic stone cabin involved access over a slickrock route, no backcountry camp, reducing work crew size, collecting mortar soil from multiple locations, and raking out the soil collection sites and footprints, as determined in the Minimum Requirements Analysis (National Park Service, C. Goetze, Cultural Resource Program manager, Southeast Utah Group, personal communication, 5 July 2011). Using traditional skills, methods, tools, and material benefits both historic preservation and wilderness character, and can benefit the long-term perpetuation of these skills.

Some situations may be contentious, but even here the Minimum Requirements Analysis is the means for systematic, comprehensive, transparent, and defensible decisions. For example, in the 7.2 million-acre (2.9 million ha) Gates of the Arctic Wilderness, in Gates of the Arctic National Park and Preserve (Alaska), the park determined the use of helicopters to be the minimum activity for

conducting legislatively required NHPA Section 110 cultural resource inventories in this extremely large and remote area (National Park Service, J. Rasic, archaeologist, Yukon-Charley Rivers/Gates of the Arctic National Parks and Preserves, personal communication, 2 August 2011).

### **Tribal perspectives on wilderness**

As this article suggests, tribal perspectives on wilderness are also important to consider. Tribal issues and concerns related to wilderness require a more detailed discussion than can be included here. Many areas today identified as wilderness have been, and continue to be, important to the traditional beliefs and lifeways of Native American tribes: they serve as hunting areas, plant gathering areas, and places associated with ceremony and spiritual sustenance. Tribal concerns may relate to cultural or natural resources, and may include maintaining access to sacred sites and reburials within wilderness, and maintaining the ability to propagate and collect ceremonial resources, such as specific plant materials, within wilderness. Tribal members may also have traditional knowledge of wilderness resources that can assist management. Consulting with tribes on potential wilderness management strategies is key.

### **Future needs**

From the foundation discussed in this article, future efforts can continue to build specific ways to address and resolve issues of managing cultural resources in wilderness. We recommend the following steps:

1. Further development of tools parks can use to help them decide which cultural resources in wilderness to manage actively, why, and with what activities and methods. Some of these tools are already available, such as the Arthur Carhart National Wilderness Training Center's online course "Managing Cultural Resources in Wilderness."
2. Further development of tools for parks to help them integrate cultural resources within wilderness character.
3. Guidance on how to address cultural resources as part of wilderness character within the park planning process.

Despite the challenges, the NPS resources management community can continue working together to negotiate differences in management approaches. Wilderness proponents and cultural resource staff can collaborate to achieve their respective goals. By working together and improving communication and understanding, we can enhance the preservation of integrated natural and cultural heritage in wilderness and the values and meanings of this heritage to our society.

### **Acknowledgments and literature cited**

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NPS/Victoria Jacobson

Figure 2. Historical CCC trail in the Chiricahua National Monument Wilderness, Arizona.

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NPS/Jill Cowley



Figure 3. Chiricahua Wilderness view from Massai Point, Chiricahua National Monument.

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USFS/Peter Landres

Figure 1. (Above) Ancestral Puebloan cliff dwellings in Johns Canyon, Grand Gulch Wilderness, Utah. ([Next image](#)) Historic preservationists complete work on the Agnes Vaille Shelter historic structure at the Keyhole on Longs Peak, Rocky Mountain National Park Wilderness, Colorado.

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NPS/Sterling Holdorf

Figure 1. ([Previous image](#)) Ancestral Puebloan cliff dwellings in Johns Canyon, Grand Gulch Wilderness, Utah. (Above) Historic preservationists complete work on the Agnes Vaille Shelter historic structure at the Keyhole on Longs Peak, Rocky Mountain National Park Wilderness, Colorado.

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