

Understanding Preservation Issues within Wilderness Areas Lessons to Take Home

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For additional information see: http://parkplanning.nps.gov/cultural_preservation_wilderness

Wilderness Cultural Resources

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1. Cultural resources in wilderness -- including archeological resources, historic structures, cultural landscapes, and ethnographic resources -- can help us understand how the land now identified as wilderness has been used and valued by people over time. All wilderness areas have a human history.
2. Park managers need to address both the 1964 Wilderness Act and the 1966 National Historic Preservation Act (NHPA, as amended) in managing wilderness cultural resources -- one law does not "trump" the other.
3. All five qualities of wilderness character (natural, untrammeled, solitude or primitive and unconfined recreation, undeveloped, and other features of value which includes historical value) are of equal stature and importance to defining the setting of a wilderness and its wilderness character.
4. Cultural resources are components of park wilderness areas and may contribute positively to wilderness character. If a cultural resource is determined not to contribute directly to wilderness character, it still needs to be identified and managed according to NHPA.
5. Management of NPS wilderness cultural resources is subject to Minimum Requirements Analysis, the process whereby it is determined if a certain action is required within wilderness, and if so, to define the minimum method and tool. Managing cultural resources within wilderness needs to meet the goal of retaining wilderness character.

Case Study: Olympic National Park

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1. Information Informs Management

- Proactive planning efforts at Olympic National Park, which emphasized baseline inventory and documentation of cultural resources in wilderness areas and potential wilderness areas, have played a significant role in the effective long-term management of these resources.

2. Cultural Landscapes Inventory (CLI)

- The CLI is an evaluated inventory of all landscapes having historical significance that are listed on or eligible for listing on the National Register of Historic Places, or are otherwise managed as cultural resources through a public planning process.
- The CLI helps parks meet their obligations under Section 110 of the National Historic Preservation Act and serves as a Consensus Determination of Eligibility.
- The CLI identifies impacts, stabilization measures, and condition of the landscape, as well as aids park managers in planning, programming, and recording treatment and management decisions.

3. Roosevelt's Homestead

- Situated within a wilderness area (including 8 acres of potential wilderness) vegetation is quickly encroaching on the formerly cleared prairie that demarcates Roosevelt's Homestead and threatens to damage historic buildings and structures.
- Deferred maintenance issues identified at the homestead site need to be immediately addressed to stabilize contributing landscape features and historic buildings and structures.
- After stabilization, long-term preservation maintenance activities, including vegetation removal, are necessary to maintain the contributing landscape features as well as the historic character of the clearing and associated homestead site.

4. Balancing Resource Values

- Some aspects of managing cultural resources in wilderness may conflict with the stewardship goals of other qualities of wilderness character. Managers must:
- Seek ways to resolve conflict to satisfy both requirements as part of "the preservation of their wilderness character."¹
- Strive to achieve balance between preservation of cultural resources, natural resources, and wilderness values.
- Ensure that all perspectives are acknowledged and respected, and then find solutions and accept compromises to effectively manage cultural resources.

¹ *Keeping It Wild in the National Park: A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring*. Developed by the National Park Service Wilderness Character Integration Team with funding and support from the NPS Washington Office of Planning and Special Studies and the Wilderness Stewardship Division. Draft April 2012 for review and pilot testing.

Historic Preservation in North Cascades' Stephen Mather Wilderness

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Each historic preservation project in wilderness is unique and must be judged according to site-specific circumstances. Historic preservation methods, tools and techniques need to balance project objectives with preservation of wilderness character.

National Park Service policies provide that cultural resources stewardship in wilderness must be consistent with the Minimum Requirements concept. Decisions must follow a two-step process:

1. Determine if action is necessary for administration of the area as wilderness and would not cause a significant impact to wilderness resources and character; and
2. If action is necessary, then the techniques and types of equipment needed to do the work must minimize impacts on wilderness resources and character.

Questions we consider at North Cascades when deliberating the Minimum Requirements concept include, for example:

- Is action appropriate in light of the site-specific threats to the cultural resource?
- What is the weight and bulk of the equipment and materials? Will transporting equipment harm personnel and/or stock? Will mechanized transport mitigate this risk?
- Impacts from stock use typically include weeds, grazing and trampling. Stock also cannot navigate some trails. Can impacts and risks be mitigated or would helicopters be preferred?
- What are the impacts of procuring materials on-site versus importing them from outside wilderness?
- Where will crews camp? How will they handle their waste? What about food storage?

Worker protections such as the Occupational Safety & Health Act of 1970 did not exist when many wilderness cultural resources were built. Back in the day, many risks were taken that would be unacceptable today. Rigidly adhering to traditional tools and techniques to preserve wilderness character can be dangerous to personnel and harm the environment.

Non-mechanized tools should be the first option, but mechanized tools have their place. Reasonable justifications for mechanized tools include mitigating safety risks to crews (e.g. lead and asbestos exposure; excessive gear weight), mitigating impacts to the environment (e.g. lead contamination, vegetation trampling, weed spread) and expediting work so as to reduce impacts to wilderness qualities such as solitude.

Taking action to preserve cultural resources must consider the dynamic aspects of the surrounding landscape in which the resource exists. For example, a historic shelter may be located on an unstable landform such as an alluvial fan, debris cone or channel migration zone. Taking no preservation measures for this cultural resource may be an option, but an agency must complete the Section 106 consultation process prior to making this management decision.

Is the cultural resource being preserved simply for its existence value—or is there a continuing use (e.g. fire lookout) anticipated? Continuing historic uses are important for protecting the cultural resource (e.g. rodents less likely to invade) and maintaining its historic significance. This may also be needed as justification if case law continues to undermine cultural resource preservation in wilderness.

Limited time, funding and personnel are real-world constraints that must be considered. Creative solutions should include partnerships and use of volunteers (e.g. to “Sherpa” gear or conduct the work),

but volunteers often lack skills and experience. They also require substantial coordination. These factors should be considered during planning.

The deliberative process is inherently subjective. The issues are often not black and white, so informed decisions must rely upon a rigorous interdisciplinary process. Decisions must also be carefully documented.