Wild Matters:

Cultural Resources in Wilderness, Cultural Resources for Wilderness

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Wilderness and culture are symbiotically joined. Human activities have helped shape and preserve wilderness for thousands of years, and wilderness designations and practices have helped to protect cultural heritage resources from a wide variety of effects. But in the management world, the relationship has had highs and lows, including court cases that conclude with a zero-sum approach to wilderness character: either a wilderness is “pristine,” or it is not. When conflicts between wilderness and cultural heritage values are settled in court, no one really wins. All stakeholders have relinquished power to a judge, communication shuts down, and confusion and ill-feeling are sown for the future. Success stories may get less attention, but everyone wins when managers consider the mutual values of resources and keep stakeholders informed and engaged. This edition of Wild Matters will consider some important principles for managing cultural resources in designated wilderness, describe areas of overlap, discuss some success stories, and provide a frame of reference as we negotiate pathways beyond – or around – the thorny obstacles of litigation.

Useful Knowledge

National parks “exist as coupled natural-human systems” (National Park System Advisory Board Science Committee 2012:8). Thus, the five qualities of wilderness character (natural, untrammeled, solitude or primitive and unconfined recreation, undeveloped, and other features of value including cultural resources) are equally important to wilderness setting and its character (Landres et al., in press). Cultural resources have scientific, educational, scenic, or historical value. The presence of cultural resources inside a wilderness offers a connection to the place
through artifacts and other features that visitors can “discover,” as well as insight into an area’s history and an enhanced connection to past generations and ancestors (Ibid). Cultural heritage resources are in all National Park Service wilderness areas (Cowley et al. 2012), even if we may not yet know exactly what they are or where they lie.

A diverse body of law, including executive orders and agency policy, directs the NPS and other federal agencies to assume responsibility for the preservation and use of cultural resources (e.g., “historic properties”) under their jurisdiction (National Historic Preservation Act as amended, Section 110(a) [1]). An array of other applicable laws and regulations ranges from the NPS Organic Act to the National Environmental Policy Act. Cultural resources get specific mention in the enabling legislation for some parks, monuments and wilderness areas. The law that established the Death Valley Wilderness in Death Valley National Park, for instance, directs NPS 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” (1994 California Desert Protection Act §410aaa). In short, cultural resources make up part of the fabric of wilderness, and the Park Service must balance both values in planning and on-the-ground stewardship practices. In order to fulfill the Wilderness Act and the National Historic Preservation Act, federal agencies must uphold both laws and the values they embody (Cowley et al. 2012). Is this impossible? If not, how best can we achieve the balance? Two key processes are in play: establishing wilderness character, and evaluating the significance of cultural resources under guidelines of the National Register of Historic Places. They meet on mutual ground: the contributions of cultural heritage to wilderness character.

**Cultural Contributions to Wilderness Character**

Certain aspects of wilderness may owe their existence to ancient human activities and values. The wilderness character qualities of “natural” and “untrammeled” might seem at first irreconcilable with human presence. But the structure and function of ecosystems are integral to these qualities, and ecosystems react dynamically to disturbances in predictable ways. Native Americans have known this for millennia. Some of their practices enhanced ecosystem characteristics that made their lives better and contributed to aesthetic qualities that we treasure in wilderness today. For example, many trails that promote a sense of solitude and primitive recreation for today’s wilderness visitors were created, used, and maintained by native travelers for millennia before they were adopted by federal agencies for public use (McKay 1994). The park-like ponderosa pine forests of the interior West that early Euro-American colonizers admired were often the result of low-intensity ground fires set by Indians to enhance visibility and ease of travel, reduce cover for pests and dangerous predators and attract wild game while still leaving old-growth trees intact (Boyd 1997). In more recent times, suppression of natural wildfire in the American West has allowed accumulation of fuels to feed catastrophic fires that are followed by erosion, invasion of exotic plants, and other profound disruptions of habitats and ecosystems (Franke 2000). Thus, past cultural activities can, and have, contributed to more than one quality of wilderness character.

Any expert in cultural resources can tell you that this term covers a broad spectrum of features and values. The NPS definition includes archeological sites, historic structures, cultural
landscapes, ethnographic resources, and museum collections. It also includes intangibles such as skills, languages, and perception. Any expert in wilderness likewise could say that no two wilderness areas are alike. Wide internal variation for each would arise from different habitats, ecosystems, and character values. The capacity for cultural resources to contribute to wilderness character is fertile ground for varying perceptions and diverse viewpoints. Most people might agree that abandoned modern mining equipment and a pond full of cyanide leach waste do not add to wilderness character (although they might provide a lesson about past human use). But perceptions might be more nuanced when it comes to a 1,000-year-old ancestral Puebloan granary tucked into a sandstone cliff, a wooden fire lookout built by conscientious objectors during World War II, an ancient petroglyph of a killer whale on a storm-swept beach, or a cluster of slate gravestones in the deep shade of a southern Appalachian forest. All are traces of bygone peoples, and so all may evoke attributes of wilderness character: solitude, primitive and unconfined recreation, and undeveloped quality. Further, the place-based nature of cultural resources like these can contribute invaluable and unique “personality” to cherished locations. This enhances the experience of wilderness visitors, too.

In more than a century of managing cultural resources, the NPS has developed a wealth of information that can help determine if and how cultural resources contribute to wilderness character. If we know that a given cultural resource exists, chances are that a “paper trail” already describes it, documents its condition, and evaluates its eligibility for the National Register under its integrity as well as criteria of significance (note: prehistoric resources, native ethnographic resources, and cultural landscapes may be eligible). The four criteria can be found at [http://www.cr.nps.gov/nr/publications/bulletins/nrb15](http://www.cr.nps.gov/nr/publications/bulletins/nrb15). Such information about a cultural resource can be of great use in targeting specific properties and characteristics that may (or may not) enhance wilderness character. If there is no such paper trail, wilderness and cultural resources experts can still work to ensure that data collection for National Register determinations can be used for assessing that “other quality” of wilderness character. Therefore, detailed, mutually useful information can improve planning for both wilderness and cultural resources and for follow-up actions such as monitoring and Minimum Requirements Analysis.

**Success Stories**

The negotiable space in the shared sphere of wilderness and cultural resources is where important decisions are made. Growing numbers of successful projects illustrate the mutual benefits of balancing both kinds of stewardship. For example, wilderness character monitoring protocols for Rocky Mountain and Glacier national parks recognize certain cultural resources as contributing to wilderness character. Two common types are 1) significant historical structures that do not detract from wilderness values, and 2) archeological sites, which reflect the dynamics of ancient relationships of people to lands now inside park boundaries. Parks can monitor deterioration or loss of key cultural resources integral to wilderness character. Then they can tailor any necessary actions to preserve both wilderness character and cultural resource values. Such monitoring is especially valuable for managing climate change, a condition for which these two mountain parks have become iconic. For instance, the remains of plants, animals and, sometimes, human artifacts can be preserved for hundreds or thousands of years in high-altitude patches of ice. The presence of natural and cultural objects in these “deep freezes” can make them major contributors to wilderness character as evidence of past ecosystems, ancient human
lifestyles in those ecosystems, and changing climate regimes. Both Rocky Mountain and Glacier have monitoring programs through Cooperative Ecosystem Studies Unit agreements with expert partners to track these unique and irreplaceable resources. Glacier’s project incorporates tribal expertise and priorities in the monitoring plans. As a result, 1,000-year-old skulls of bison have been discovered in both parks, as well as fragments of trees no longer found at those mountain altitudes. Such discoveries show the dynamics of wilderness ecosystems, the adaptive range of their animals and plants, and the history of how the ice patches themselves formed. Cultural items can lend insight into ancient hunting, travel, and spiritual practices still relevant to native peoples today.

Historic structures in wilderness are a more common source of contention, but Zion National Park has shown that a systematic, well-documented approach to balancing cultural and wilderness objectives based on wilderness character can be successful. In the Zion Wilderness, a 2011 assessment found two historic cabins in serious need of treatment. The Taylor Creek cabins in the Kolob Canyons area of the park were built in the 1920s by local college professors who were studying land management and how to prevent livestock overgrazing. As excellent examples of pioneer use of Zion’s lands, the cabins were found eligible for the National Register because they were in good condition, and no other examples of such cultural resources existed in the park (Zion National Park 2011:3). Park managers felt that “the highly rustic condition and appearance of these cabins help each visitor to establish a connection with the landscape and understand the contributions of those who survived in the once and current ‘wild’ places through their own labor and ingenuity. Such connections are crucial to foster and promote wilderness stewardship, particularly today, as technology further separates us from our natural environment” (Ibid). Therefore, the Taylor Creek cabins were judged significant both as cultural resources and as contributors to wilderness character.

This set the stage for stabilization through Minimum Requirements Analysis of specific actions, including best ways to obtain wood for repair, how to hammer roofing nails, and other period-specific details. Zion Superintendent Jock Whitworth said the park’s wilderness and cultural resource managers analyzed proposed actions for the cabins to determine if they were necessary to preserve one or more qualities of wilderness character. The park also evaluated project compliance actions such as preparation of an Environmental Screening Form (ESF) containing project details and reviews by the park’s subject-matter specialists. For Section 106 review and compliance under the National Historic Preservation Act (NHPA), “we relied on the 2008 Service-wide Programmatic Agreement Streamlined Review Process” (Jock Whitworth, personal communication). Specifically, the park used the “Streamlined Activity III.C.1. Preservation Maintenance and Repair of Historic Properties.” The completed Minimum Requirement Analysis Worksheet was presented to the park’s Wilderness Committee for review because the cabins are in designated wilderness.

Zion concluded that its planned preservation actions reflected primitive, non-motorized, non-mechanized techniques used by the original pioneer builders. Further, it found that negative effects of the work on the undeveloped natural qualities of wilderness character would be short-term and negligible. Finally, the park embedded preservation activities in a larger management scheme. The plan combined “maintaining historic integrity of each structure, continuing use of the cabins for interpretation and education, thereby providing a safe venue for researchers and
the public to be informed of the early 20th-century human occupation and use of these magnificent canyons; and creating media products that promote the project as a model of appropriate cultural resource preservation in a wilderness setting in ZION” (Zion National Park 2011:1). These examples demonstrate collaborative management that combines wilderness and cultural resources values into successful stewardship for both. More success stories in our national parks can be seen in Cowley et al. 2012 (http://www.nature.nps.gov/ParkScience/index.cfm?ArticleID=537).

**WHAT IF . . .?**

Inevitably, some cultural resources inside park wilderness may not contribute to wilderness character. When such features are found eligible for the National Register, it is more important than ever for wilderness and cultural resources managers to communicate effectively and often. The communications loop should include state historic preservation offices, affected American Indian tribes, advocacy and interest groups, and local communities. Cultural resources procedures required by law can actually be helpful in this. Section 110 of NHPA directs federal managers to preserve and protect cultural resources, and Section 106 of the act applies when an action potentially can affect the characteristics that make a cultural resource eligible to the National Register. Consultation procedures in Section 106, 36 CFR Part 800 (“Protection of Historic Properties”) offer a process for working with stakeholders, assessing the significance of cultural resources, and scoping the treatment options. Then those options can be assessed to see if they fit within wilderness character, Minimum Requirements Analysis, and other wilderness values. Section 106 consultation usually leads to a Memorandum of Agreement (MOA) between consulting parties that outlines agency measures to avoid, minimize, or mitigate for adverse effects on a cultural resource. In some cases, those involved may agree that some adverse effects must be accepted in the public interest (http://www.achp.gov/106summary.html#resolve). If adverse effects on cultural resources are unavoidable, cultural resources experts know a variety of measures that can at least lessen the effects. These could include, among others, specific documentation measures (e.g., HABS/HAER/HALS, see http://www.nps.gov/history/hdp/habs/index.htm), preservation or enhancement of similar cultural resources in other locations, and research, educational, or interpretive products. It is important to remember that cultural resources are non-renewable. An “unavoidable adverse effect” is forever.

**BEST PRACTICES**

First and always, lead time is the key to resolving difficult or conflicting values. Planning well in advance of “triggering” events (e.g., deterioration of a cultural resource, the need to build a new section of trail, etc.) can identify goals and actions for managing wilderness and cultural resources together and in balance. Secondly, communication that includes a variety of experts and stakeholders can reach potential solutions (even if imperfect) that broaden the amount of useful background knowledge and increase the likelihood of outcomes acceptable to all. Taking ownership of difficult decisions can mean the difference between a successful outcome and a process languishing for years in legal limbo. Given the number and variety of cultural resource laws and requirements involving state and tribal historic preservation offices, a cultural resource manager (from the park, regional office or an archeological center) must always be included on
the interdisciplinary team for wilderness stewardship planning. Wilderness and cultural resources requirements may complement each other. For example, the traditional skills, methods, tools, and materials commonly stipulated by Wilderness Minimum Requirements Analysis benefit both historic preservation and wilderness character (Cowley et al. 2012). They also preserve increasingly rare intangible aspects of cultural resources: historic American traditions of construction and repair, and landscape management.

Here are some useful resources:
- Three online training modules on managing cultural resources in wilderness ([http://www.wilderness.net/index.cfm?fuse=NWPS&sec=elearning](http://www.wilderness.net/index.cfm?fuse=NWPS&sec=elearning)), developed by the Arthur Carhart National Wilderness Training Center
- Selected excerpts from guidelines developed by the Advisory Council on Historic Preservation to promote “an approach to resource management and conflict resolution on federally-owned public lands that achieves balance between natural and cultural values.” Available at [http://www.achp.gov/achpcultnatpolicy.html](http://www.achp.gov/achpcultnatpolicy.html)

**Conclusion**

Three things bear repeating: 1) cultural resource laws apply inside wilderness; 2) cultural resources may be part of wilderness character, and 3) the Wilderness Act requirement to preserve wilderness character applies to managing cultural resources in wilderness. The relationship between cultural resource and wilderness values can be mutually beneficial, and limited resources can be applied to address both. Wilderness designation helps cultural resources by protecting them from modern activities that could destroy them or diminish their integrity. Cultural resources can help wilderness by providing a unique sense of place and showcasing the dynamic and vital relationships between people and nature.

Respecting the integrity of both cultural and wilderness resources is essential to successful management. Planners and managers should keep both wilderness stewardship and cultural resource stewardship in mind, develop them in tandem, and clearly spell out the actions they take as a result in planning documents for both. Avoiding all management actions that negatively affect wilderness, cultural resources or both may be impossible. But when conflicts arise, future efforts will benefit if the planning, communication and documentation recognize that both resources and the values that they hold are much more than the sum of their parts. As Zion National Park’s analysis of its rustic wilderness cabins puts it: “(They) help us to remember that Wilderness is a part of us and we are a part of it, too” (2011:3).
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