



**National Parks Conservation Association®**  
*Protecting Our National Parks for Future Generations®*

**Testimony of**

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**Re: “History Forgotten: The Condition of Cultural Resources in the National Park System”**

**Before the Subcommittee on National Parks of the Senate Committee on Energy and Natural**

**Resources**

**U.S. Senate**

**Mesa Verde National Park**

**November 5, 2011**

Mr. Chairman and members of the subcommittee, I am Dr. Gail Dethloff, Director of the Center for Park Research with the National Parks Conservation Association (NPCA). NPCA is a nonprofit, nonpartisan organization dedicated to the protection and enhancement of our National Park System, with 344,856 members nationwide. Since 1919, NPCA has been the leading voice of the American people on behalf of our national parks. We are happy to have this opportunity to testify today because our research clearly shows that the state of cultural resources in America’s national parks is jeopardized by major challenges, including challenges in funding and management.

NPCA’s Center for Park Research provides accurate, comprehensive information and analysis on resource conditions throughout America’s National Park System. The Center’s professional staff has expertise in areas such as ecology, environmental quality and monitoring, historic preservation, anthropology, and environmental history.

Over the past decade, the Center evaluated natural and cultural resources at 80 national park units. Of these 80, the Center for Park Research assessed the condition of park heritage properties and museum and archival collections in 77 parks. NPCA researchers consulted National Park Service (NPS) cultural resources databases, examined reports and studies produced by or for the Park Service, visited parks in

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person, and conducted interviews with park and regional staff. When assessing the condition of parks' cultural resources, we employed a methodology based on the National Park Service's own *Cultural Resources Management Guideline*. The methodology analyzed the condition of archaeological properties, museum and archival collections, cultural landscapes, ethnography, and historic structures, and the status of historical research. Our findings were published this summer in *The State of America's National Parks*. The data we collected and the summary report provide the basis for this discussion of cultural resources in the National Park System.

The National Park System encompasses an extraordinary portfolio of significant American culture. More than 65 percent of national park units were designated to preserve places where the North American story took place, from prehistoric times to the present. Across all 396 national parks one finds nearly 27,000 historic buildings, 3,500 historic statues and monuments, an estimated 2 million archaeological sites, and 123 million museum objects and archival documents—collections bested only by the Smithsonian Institution's assemblage of museums. Here at Mesa Verde exist more than 4,000 archaeological sites, including 600 cliff dwellings, which provide an astonishing record of the life of the Ancestral Puebloan people who lived here a thousand years ago, whose descendants still live here in the Four Corners region and along the Rio Grande. Mesa Verde has a unique set of resources but the park is one of a number preserving the historic cultures of the Southwest. Most of the major battlefields associated with the American Civil War are managed by NPS, and by virtue of the sites the agency manages and the stories it interprets and preserves, NPS is one of the largest stewards of African-American, Latino, Indian, and Asian-American history in the country. In addition, the Park System preserves sites fundamental to understanding social forces such as westward movement, industrialization, and the quest for equal rights for all citizens.

The National Park Service is the closest thing the United States has to a heritage ministry. As the steward of these sites and through its federal matching grants for preservation activities, its technical expertise, and its management of a federal tax incentives program valued at more than \$2 billion in private investment each year, the Service governs how our country's cultural resources are managed. The support received from the administration and Congress has a strong bearing on this governance.



With robust preservation management and activities, Americans have amazing opportunities to understand where we've been as a people and how our heritage affects where we are going.

The National Park Service has been charged with protecting our nation's most important historic sites since its beginning in 1916, and works to do so under legislative mandates such as the Antiquities Act (1906), the National Historic Preservation Act (1966), the Archeological Resources Protection Act (1979), and the Native American Graves Protection and Repatriation Act (1990). The agency developed its most recent set of standards to guide the management of cultural resources in the late 1990s. Devoted and talented people from cultural resources disciplines are attracted to working in our national parks because the parks represent the most important parts of our heritage, with the highest standard of preservation. We ourselves used NPS guidelines to shape the methodology we used in assessments and we found that closer adherence to the standards appeared to result in better resource condition. In parks established primarily to protect cultural and historic resources, these resources do fare better, relatively speaking. While we did not assess Mesa Verde, it is our country's flagship archaeological park, and its extensive archaeological research program, preservation leadership, and the curatorial work being done to move the collections to the new Visitor and Research Center indicate a very high level of adherence to the *Cultural Resources Management Guideline* and correspondingly healthy resource conditions.

But there is also, in the history of the park system, a history of inattention to cultural resources and their management in many places, especially parks established to preserve natural and scenic resources, and small parks with less visually spectacular but still vitally important cultural resources. Our research shows that a systemic attitude that heritage preservation should play second fiddle to natural and scenic wonders and overall inadequate funding for the system have led to decisions that have slighted cultural resources. Our parks struggle with an inadequate baseline understanding and inventory of resources, a shortage of professionally trained staff, and a lack of funding that have caused overall cultural resources condition to be considered "fair" or "poor" at 91 percent of the parks we surveyed.

### **Interrelated Issues**

The problems affecting cultural resources occur across park designations and across regional divisions. But they are not insurmountable; they are understandable and can be addressed. And there are good

examples of NPS staff finding solutions to the problems, which can serve as a path forward from where we currently stand.

The first step in cultural resources management is to identify, evaluate, and document the properties and collections in the Park Service's care. This baseline documentation of resources is the key to next steps. Unidentified and unevaluated resources simply cannot be appropriately preserved, protected, or interpreted. At Rocky Mountain National Park, which the Center assessed in 2002, we noted a need for historic structures resource studies and condition reports, and in the intervening time, park staff worked through the Cooperative Ecosystems Studies Unit to contract with local universities to complete those documents. With that information in hand, park staff had documentation on what they have, what threatens it, and what the next steps are for protecting and preserving the resource. However, all parks the Center assessed lacked cultural and heritage planning documents (such as comprehensive interpretive plans, historic resources studies, ethnographic overviews and assessments, cultural landscape reports, and collection management plans) in one or more disciplines. Because these research and planning documents inform a park's larger planning documents, processes, and decision-making, their absence means that cultural resources continue to be ignored as park managers determine how to spend limited time and money. Simply put, unless park managers seated at the planning table have authoritative proof of the importance and condition of cultural resources in their park, those resources are not taken into account when decisions about park priorities and budgets are made.

With the information in hand on what resources exist at the park and what may threaten them, NPS staff with appropriate expertise on specific resource types can take the necessary steps to protect, preserve, and interpret them. At Mesa Verde, a structural stabilization crew of professional archaeologists and stone masons work together to maintain the cliff dwellings and archaeological structures. At park sites with brick-and-mortar fortifications (e.g., Fort Sumter, Fort Pulaski, Fort McHenry, Dry Tortugas (Fort Jefferson), Gulf Islands (Fort Pickens), Golden Gate (Fort Point)), the presence of a historical craftsman, such as a mason, is essential to properly caring for properties. However, cultural resources staffing has seen a significant decline (> 25%) in the past 10 years, and even in a major cultural park like Appomattox Court House National Historical Park, cultural resources management and historic preservation have been relegated for periods of time to the level of collateral duties.



Very few parks assessed by the Center either had on staff or had access to in the Regional Office the unique complement of professionals needed to do the job. For example, of the parks assessed by NPCA, 65 percent lacked the minimum professional staffing needed to oversee museum and archival collections and address the growing backlog of museum objects. When it comes to these situations, even a single staff person can have a significant impact. At Lake Clark National Park and Preserve, an archival technician with a three-year position significantly decreased the percentage of uncataloged items, even as the collection more than doubled in size, making these materials easily available for park staff and other researchers for the first time. When experts are present, they are finding it more and more difficult to stay current with training, education, and participation in the scholarly arena. These personnel need training and education that allow them to apply relevant, up-to-date scholarship to understanding and interpreting our nation's stories. When it comes to caring for the prehistoric and historic places, monuments, and museum collections in the Park Service's care, there is no higher priority than professionally trained staff.

Having baseline documentation and professional staff on hand are also primary factors in implementing appropriate oversight and monitoring of America's cultural heritage. When resources are catalogued and identified, they can be maintained and guarded in a cost-effective manner. At Capitol Reef National Park in Utah, there is adequate staff to conduct annual monitoring of the park's 25 historic structures, and the data are kept up-to-date in the List of Classified Structures. Comprehensive condition assessments for each structure are performed every five years, and all structures have been evaluated for eligibility for listing in the National Register of Historic Places. Any adverse changes in condition would be noted and could be addressed in a timely manner. But regular monitoring is the exception rather than the rule. In a more extreme example, at the time of our assessment, Big Bend National Park in Texas had no annual monitoring program in place for historic structures, even though the park has 69 structures either listed on or eligible for the National Register of Historic Places. At Big Bend, due to a lack of staff and competing management priorities, inspections of historic buildings are conducted on a five-year rotational cycle only for the most heavily visited or publicly accessible structures.

Documentation and personnel are also important in the maintenance of the most visible of cultural resources in many parks, the historic buildings and structures. If the structures have no documentation to

guide treatment, or their condition has not been monitored, park staff can only guess at the work that is needed. But, because of the dollar amounts involved, the construction budget for the Park Service itself has become an over-riding factor when it comes to the condition of these resources. Currently, the deferred maintenance cost for historic structures in the park system is estimated at \$2 billion. Certain parks have taken innovative approaches to preserving their structures, even in the face of declining budgets, by taking actions such as partnering with community organizations to maintain and use park structures. For example, Valley Forge National Historical Park in Pennsylvania has had great success leasing one of its historic properties to a local Montessori school. While the property is historic, and therefore the park has an obligation to preserve it, it is not part of the park's main interpretive theme, and the park had no interpretive or administrative use for it. But other parks are struggling with structures whose conditions continue to worsen as maintenance is delayed. Alcatraz Island in Golden Gate National Recreation Area has benefited from rehabilitation work on one of the two remaining guard towers and seismic retrofitting of the Cellhouse, but other structures such as the New Industries Building and the Sallyport of the guardhouse through which all visitors enter are visibly deteriorating.

### **Ways Forward**

In a number of instances, NPS is doing an exemplary job of preserving and protecting the historic places and artifacts in its care, and for that we commend them. Championed by loyal and dedicated NPS professional staff, the task of fulfilling the agency's statutory mandate to preserve these places unimpaired while providing for the enjoyment and benefit of these places by the American public has become an ever-increasing challenge.

But striving for that mandate provides the excellent opportunity to connect all Americans with "America's best idea." Given its analysis of resource condition information, the National Parks Conservation Association makes the following recommendations for improving cultural resource conditions in the National Park System:

#### Recommendations

- NPS should establish and Congress should fund a Cultural Resources Challenge that enables the agency to work effectively on cultural resource management and historic preservation in the



parks and through its programs. NPS should address long-term solutions to problems in cultural resources preservation and protection and leverage such funding through partnerships. This will greatly enhance the level and type of resources devoted to cultural resources preservation.

- NPS should continue internal programs such as the System-wide Archeological Inventory Program (SAIS), the Preservation and Skills Training (PAST) program, and the Ruins Preservation Team based out of Mesa Verde. These programs address the basic needs of completing baseline documentation, providing staff training, and providing access to technical staff identified as fundamental issues in preserving cultural resources. The programs should also be used as models for solutions across cultural resource disciplines.
- NPS should better utilize partners such as the Cooperative Ecosystem Studies Units National Network to acquire technical baseline information that all parks need on cultural resources. This could include educating NPS staff that Network universities or other partners are available to work on cultural resources. Work through such partnerships would alleviate urgent needs and help parks to identify which cultural resource specialists they need over time at the park or regional level.
- NPS should encourage the involvement of community partners in preserving and interpreting cultural resources. Congress should assist in this process by removing barriers to this involvement through such actions as supporting public transportation enhancements to help volunteers get to parks easily, and revising tax and other regulations to make it possible for community partners to take advantage of historic preservation tax credits for rehabilitation of park historic structures.
- The National Park Service should incorporate cultural resource management concerns in all considerations of institutional capacity. The National Park Service Director, all associate directors, regional directors, superintendents, and others must take full responsibility for cultural resources in the System. The National Park Service should establish a Cultural Resources Advisor to the Director of the National Park Service as a complement to the existing Science Advisor position.

The National Park Service holds in trust for the American people the places, artifacts, and stories that form our collective heritage. If we are to continue to understand, appreciate, and learn from our heritage, NPS must have the tools and resources it needs to keep those places open to the public in safe and historically accurate condition, to keep the artifacts on display in appropriate settings accessible to all, and to share those stories in meaningful ways that are relevant to Americans today. NPS staff are on the front lines in caring for our history, but we are all responsible for safeguarding and preserving these irreplaceable pieces of who we are as a people and a nation.

Given the long history of inattention to cultural resources, NPCA applauds this Subcommittee's leadership in seeking insight and perspectives from various knowledgeable panelists on the significant threats and challenges facing these precious resources in our national parks. Here at Mesa Verde, it is apparent what can be achieved with dedicated and highly skilled park staff working with strong partners. This is an extraordinary place. It is a global icon and a source of great pleasure and enjoyment for half a million visitors each year from all over the world. It is also a dynamic economic engine that provides a source of livelihood for the entire region. Thank you for the opportunity to provide this testimony.