



National Park Service

NPS-28: CULTURAL RESOURCE MANAGEMENT GUIDELINE

Effective Date: June 11, 1998

CHAPTER 10: MANAGEMENT OF ETHNOGRAPHIC RESOURCES

A. Overview and Introduction

This chapter is about people and the ethnographic resources, or traditional park sites, structures, objects, landscapes and natural resources, they define as significant to their present way of life.

1. The Park Applied Ethnography Program

Attention to the peoples whose lifeways are traditionally associated with resources under National Park Service stewardship is mandated in legislation and NPS policies. According to the 1988 *Management Policies* (5:11):

Certain contemporary native American and other communities are permitted by law, regulation, or policy to pursue customary religious, subsistence, and other cultural uses of park resources with which they are traditionally associated. Such continuing use is often essential to the survival of family, community, or regional cultural systems, including patterns of belief and economic and religious life. Recognizing that its resource protection mandate affects this human use and cultural context of park resources, the National Park Service will plan and execute programs in ways that safeguard cultural and natural resources while reflecting informed concern for the contemporary peoples and cultures traditionally associated with them.

Ethnography, part of cultural anthropology, is concerned with the peoples associated with parks, with their cultural systems or ways of life, and with the related technology, sites, structures, other material features, and natural resources. In addition to traditional regimes for resource use, for example, and family and community economic and social features, cultural systems include expressive elements that celebrate or record significant events and may carry considerable symbolic and emotional weight. These include rituals, sacred narratives such as origin myths, verbal arts including folk tales, and performing and graphic arts. Cultural anthropologists refer to behavioral, value, and expressive patterns, and technology, as features of cultural systems. Preservation specialists may use the term "intangible" to refer to behavior, values, and expressive culture.

Developing programs, policies, guidelines, and data to help management identify and protect culturally significant resources falls to the applied ethnography program. A major goal is to facilitate collaborative relationships between the NPS and the peoples whose customary ways of life affect, and are affected by, park resource management. Seeking practical outcomes, the program identifies issues that concern management, communities, and the resources they both value and provides information to promote mutually acceptable solutions. It cooperates with other programs and with the publics associated with parks to help reduce tensions and close gaps between NPS and community goals.

2. Need for Ethnographic Technical Assistance and Data

Ethnographic assistance is required when particular communities, tribes, or groups, and their ways of life, are known or thought to have traditional links to park resources and any of the following are anticipated:

(a) Preparing special resource studies or general management, land protection, resources management, interpretive, or other plans requiring information about and consultation with potentially involved people.

(b) Formulating legislative proposals, policies, and guidelines affecting communities and neighborhoods associated with proposed, new or existing parks.

(c) Studying, consulting on, planning for, and monitoring traditional resource uses and assessing effects of park programs on them.

(d) Inventorying and reaching treatment decisions about traditional resources.

(e) Planning or implementing subsistence programs, ecosystems management approaches, and natural resource programs including biological diversity inventorying and monitoring, global climate change, and Man and the Biosphere.

(f) Consulting about and determining lineal descent or cultural affiliations between past and contemporary Native Americans and their associations to park resources, including park collections.

3. Traditionally Associated Groups and Resource Uses

Emphasis is on resources significant to non-recreational users: park neighbors, traditional residents, and former residents who remain attached to the area despite having relocated. People with loved ones buried or commemorated at NPS memorials represent another unique user group. They all represent a special client population with long-term stakes in the integrity of park resources and the outcomes of management decisions that affect resources associated with them.

Traditional users generally differ as a group from recreational visitors. Although they may value park units, such as the Washington Monument, that symbolize U.S. nationhood, a shared identity, and nationally significant processes, events, and people, the groups associated with particular parks typically assign significance to places closely linked with their own sense of purpose, existence as a community, and development as ethnically distinctive peoples. These places may support subsistence or ceremonial activities or represent birthplaces of significant individuals or group origin sites. They may be migration routes marking, for example, the Native American diaspora or northward sanctuary and freedom trails of 19th-century African Americans. Traditional user groups are likely to be Alaskan natives including Inupiat, Yupik and Dena'ina peoples, American Indians in the contiguous 48 states, and Pacific Island peoples such as Hawaiians, as identified in the *Management Policies* (8:9). They could be diverse white ethnic groups such as those associated with Cape Cod, African Americans at Jean Lafitte, Asian Americans at Manzanar, and Hispanic Americans at Tumacacori. American Indian people are highlighted because of their governmental relationship to the federal government, a point made by the Constitution, treaties, legislation, a significant body of case law, Department of the Interior trust responsibilities (which also affect certain Pacific islands) and regulations, and *Management Policies* (chapters 2, 4, 5, 6, 7, 8, 10).

For policy purposes, "Native American" refers to American Indian tribes recognized by the federal and state governments, certain unrecognized tribes, Alaska Native entities, and Native Hawaiians and other Native Pacific Islanders of the U.S. trust territories. The definition is inclusive for purposes of consultation with groups whose interests are affected by NPS decisions. Native Hawaiians and some American Indian groups are not recognized by or eligible to receive services from the Bureau of Indian Affairs. Still, they define themselves and are known to others as groups who historically shared linguistic, kinship, political, and other distinguishing cultural features. They are considered consultative partners when they have traditional associations with park resources.

Some "unrecognized" tribes are petitioning the Bureau of Indian Affairs for recognition. Ethnographers and American Indian liaisons in support offices can help parks track the progress of petitions.

To be considered traditional, associations to park resources will usually have endured at least two generations. Native Americans often have much longer ties to resources and view them as uniquely their cultural patrimony. In these cases they might express their strong sense of spiritual guardianship over the resources and interest in participating in related planning, management, and interpretive decisions. Park responses to these interests, and those of other associated communities such as former residents of Cades Cove, should include establishing and maintaining regular consultations, "friends" committees, and formal cooperative arrangements through memorandums of understanding.

Identifying groups with traditional associations to park resources occurs in several ways. Identification might start when park staff observe or infer certain uses. Prime examples are the hunting and fishing activities of Alaska's Dena'ina Athabascan peoples. Hispanic worshipers use San Antonio Missions and white Arkansas families live at Buffalo River. African Americans live in sight of the Martin Luther King, Jr., National Historic Site, and relatives and friends of deceased veterans leave mementos of their grief at the Vietnam Veterans Memorial. Other traditional uses are not always apparent to cultural outsiders or casual observers but might be inferred from evidence, such as ceremonial offerings left at Haleakala.

Less visible uses occur off-site as people recount oral traditions highlighting park resources with central roles in traditional beliefs, history, and practices. Heritage lessons for the young are embedded in narratives anchored to park localities. Euro-Americans memorialize Ellis Island in legends of cultural passages from the old world to the new and recall the abrupt exchange of old identities and names for startlingly new "personas." Devils Tower or, as many prefer, "Bear Lodge," figures prominently in Northern Plains Indian origin accounts. Traditional oral narratives, and place names, offer additional contexts for understanding the resources and their contributions to a people's cultural identity. Consulting with associated groups to identify the resources and preferred treatments is important.

4. Traditional Ethnographic Cultural and Natural Resources

Ethnographic resources are variations of natural resources and standard cultural resource types. They are subsistence and ceremonial locales and sites, structures, objects, and rural and urban landscapes assigned cultural significance by traditional users. The decision to call resources "ethnographic" depends on whether associated peoples perceive them as traditionally meaningful to their identity as a group and the survival of their lifeways. Some such resources may be designated by other terms and cross-listed in other NPS inventories. Sites defined as archeological for preservation purposes, for example, are ethnographic if traditional religious practitioners consider them significant sources of spiritual power. Members of associated groups may also ascribe meaning to properties in park collections perceived as sacred or as items of cultural identity and heritage. Groups also assign their own cultural meanings to natural landscapes and localities.

The traditional management distinction between natural and cultural resources may be inapplicable where ethnographic resources are concerned. When natural resources acquire meaning according to the different cultural constructs of a particular group, they become ethnographic and thus cultural resources as well. This makes it important for NPS specialists to consult associated groups about the heritage significance of natural resources in activities and beliefs related to, for example, religion, healing, and subsistence. In addition, plants inventoried for natural resource purposes are also often culturally categorized by local peoples according to traditional systems of knowledge about plants and animals (ethnobiology). Recording and analyzing this knowledge can reveal unanticipated information on local ecology. Some peoples' religious beliefs also require quarrying certain minerals or collecting certain plants in specific places for sacred or medicinal purposes; just any minerals or plants found elsewhere will not do, even if geologically or botanically identical. Sensitivity is important to culturally defined use of natural resources.

Sufficient data will be developed to identify the culturally specific uses of cultural and natural resources, track the effects of use on the resource base, and assess effects of park resource management on traditional ways of life. In Alaskan parks, traditional use studies will be conducted in cooperation with rural Alaskans for subsistence information, pursuant to Title VIII, Section 812 of the Alaska National Interest Lands Conservation Act (ANILCA), and for other parks where traditional consumptive use is permitted by legislation, treaties, regulation, or policy (see *Management Policies* 8:10). Where traditional users regard limited plant collection as crucial for certain religious or curing activities, and no threatened or endangered species are affected or wildlife disrupted, managers are encouraged to cooperate with concerned communities to develop systems for controlled gathering.

The cultural use of natural resources for subsistence is studied as part of a complex system that includes related features such as the environment, population size, technology, and family life and civic duties. In acknowledging the cultural context for subsistence, studies address qualitative social, cultural and other system aspects, not just quantifiable variables such as harvest size and frequency. Backyard gardens or infrequent plant gathering for religious ceremonial or medicinal needs will be documented within the broader cultural context as well.

(For more information see the *Natural Resources Management Guideline* (NPS-77), Chapters 2, 3, 4.)

a. Identifying Ethnographic Resource Boundaries

The physical boundaries of ethnographic resources will be documented, although they may not always match the visible fixed boundaries of other cultural resource types or natural features. Sacred resources can have spiritual impacts that extend beyond their obvious physical limits so that, in effect, they generate "spiritual activity fields." For example, traditional Native American practitioners perceive significance not just in particular trees where eagles roosted on auspicious occasions, but in the surrounding landscape as well. Hispanic worshipers at colonial missions may symbolically acknowledge the role of the chapel by making culturally appropriate signs before arriving at its entrance.

Other ceremonial resources, such as Native American spirit trails or vision quest sites and sacred spaces in general, may be too elusive for cultural outsiders to perceive or too private for believers to discuss. These situations, and practitioners' views on resource treatment and protection, will be addressed through systematic consultation and collaborative ethnographic studies of traditional use. Identifying spiritual activity fields in specific localities and adequately protecting their outer boundaries might not always be feasible, but an essential first step is collaboration with associated groups to determine boundaries and preferred treatments.

b. Ethnographic Resource Types

Some ethnographic dimensions of standard preservation categories and environmental features follow:

Sites: Archeological or historic places assigned significance by traditionally associated people as locales, for example, of their physical, cultural, or spiritual origins.

Structures: Built features that associated peoples accord importance as, for example, places of ethnic or national conversion (Ellis Island), spiritually powerful residences (Mesa Verde), family homesteads (Buffalo River), and religious and social centers (African Meeting House).

Objects: Portable materials that curators classify as archeologic, historic, ethnologic, or natural but traditionally associated people classify as ceremonial materials, diaries, spiritual entities, adornment, and other categories of ethnic heritage. Objects made for domestic use or trade are included.

Landscapes: Areas containing diverse natural and cultural resources that associated people define as heritage resources. Examples are contemporary settlements such as that at Martin Luther King, Jr., National Historic Site, New Orleans neighborhoods, the Timbisha Shoshone community at Death Valley, and massive geological structures such as Devils Tower. Small plant communities, animals, and subsistence and ceremonial grounds are included. Historic sites and designed and vernacular landscapes may have ethnographic significance.

5. Ethnography's Interdisciplinary Role

The program contributes uniquely to diverse cultural and natural resource programs and activities as follows:

Archeology: Ethnography supports archeological permitting, repatriation, and consultation activities by providing information on contemporary groups with traditional interests in prehistoric and historic archeological resources and data on cultural affiliations between past and present groups and object classes.

Curation: Ethnography offers data on cultural affiliations between past and present groups and objects in NPS collections, the significance assigned to objects by contemporary peoples, repatriation, and culturally appropriate treatment of objects and approaches to groups associated with them.

Cultural landscapes: Ethnography addresses landscape resources and the traditionally associated groups who develop their own interpretations, names, and preferred uses for them. It makes the perspectives and knowledge of traditional resource users accessible to NPS managers.

History: Ethnography approaches oral history, ethnohistory, and other studies of the past by highlighting local processes of change and stability within larger contexts. Working with community members and analyzing documents, ethnography presents the past not only as reconstructed by cultural outsiders but as interpreted by involved communities.

Historic Structures: Ethnography contributes perspectives on the use, manufacture, and organization of structures, including insights into relationships between family and community organization and the use of private and public space.

Planning: Ethnography provides perspectives on people and cultural systems affected by proposed or existing parks. It contributes to culturally appropriate consultation strategies and evaluates consultation results to identify sensitive issues. (See *Management Policies* 2:5, 6, 9.)

Natural resources programs: Ethnographic data on the traditional use and management of culturally important natural resources helps inform ecosystem management, programs of consumptive use, Man and the Biosphere, and global climate change about relationships between environmental issues and local resource uses. (See *Management Policies* 4:1, 2.)

Interpretation: Ethnography provides data on groups with traditional resource associations and their views of resource use and appropriate public programs. (See *Management Policies* 7:5.)

Ranger activities: Ethnography provides perspectives on traditional resource uses that contribute to the culturally informed formulation and implementation of policies and regulations on park use. (See *Management Policies* 8:8, 9, 10.)

International affairs: Ethnography provides cross-cultural expertise for programs that plan for the protection and management of resources associated with indigenous or other small-scale communities.

B. Research

1. Principles of Ethnographic Research

a. Collaboration

The collaborative and open character of park ethnography must be continually stressed to ensure that communities whose heritage resources and associated lifeways are being studied understand and participate in the studies as early and in as many ways as possible. Community knowledge and support contributes to the research findings, while participation helps communities better understand anthropological concerns and NPS goals.

Concurrence in study goals and permission to proceed will be obtained before conducting a study; written permission will be sought from tribal councils. Even studies that primarily review published or unpublished materials include brief interviews and consultations, thus requiring community support. Draft reports will be circulated so that affected groups can suggest mid-course corrections.

Collaboration may take the form of paid research partnerships for community members or co-authorships of reports where community members have contributed substantially to a study. Local contributions to a report will be explicitly recognized.

Researchers are expected to establish cooperative relationships with park management, staff, and involved planning teams to incorporate their expertise and enhance the practical value of their reports.

b. Research Conduct, Confidentiality, and Information Management

Management Policies (5:12, 13) recognizes the need to keep confidential the location, character, and cultural context of certain ethnographic resources, especially historic and archeological resources with sacred significance. Data on them are exempted from public disclosure consistent with Section 304 of the National Historic Preservation Act and Section 9(a) of the Archaeological Resources Protection Act. NPS

policies also require protecting community members by keeping their identities confidential to the extent permitted by law.

Details on sensitive religious resources will be deleted or protected in all cultural resource reports going to the National Technical Information Service or the public. Locational information on sensitive resources will be deleted or protected in ethnographic studies, the Ethnographic Resources Inventory, and planning documents, and locations of sacred sites will be deleted from public maps, brochures, and other interpretive materials when warranted. The need for confidentiality of sensitive data will be indicated on National Register of Historic Places forms.

NPS ethnographers and contractors will subscribe to the principles of conduct developed by the American Anthropological Association and the Society For Applied Anthropology. Each NPS contract and research agreement will include provisions on confidentiality, contractor-community relationships, and contractor-NPS relationships. Contractors, for example, may retain raw field data and summarize them for the NPS, provided that future NPS questions on that data are answered without additional cost.

Contractors will protect the identity of community cultural experts by using pseudonyms unless experts specify otherwise in writing. They are responsible for holding the list of consultants and pseudonyms confidential. They will review their draft research designs and reports with the affected communities and revise the drafts as appropriate. No information about sensitive resources will be made public by a contractor without explicit permission from the NPS and the community or tribe.

Summaries of field notes, oral history tapes, videotapes, photographs, etc., that are turned over to the NPS by researchers are managed as parts of the parks' museum collections, with appropriate restrictions on public viewing of confidential materials.

Standards

- Principal investigators are applied cultural anthropologists with the Ph.D. or comparable research experience and a record of applied experience and high professional standing in the anthropological community.
- Community cultural experts or consultants are involved as research cooperators, credited for their contributions, and appropriately compensated.
- Provisions for confidentiality are implemented.
- Affected communities review and approve draft research reports.
- Appropriate NPS staff are briefed on research results and provisions for confidentiality.
- Research results are shared with the community and published.
- Studies identify resources for inclusion in the Ethnographic Resources Inventory, for nomination to the National Register of Historic Places, and for interpretation as appropriate.

2. Methodologies

Ethnographic research methods must be technically credible and responsive to specific cultural dimensions, such as language needs. Researchers with special language competencies, in addition to experience in the geographic area and with particular peoples and methodologies, may receive priority in the competition for contracts. Ethnographers will prepare research designs, task directives, and scopes of work and identify the range of appropriate methods in consultation with park managers. Consultations about the proposed research will occur with groups whose resources and resource uses are the subjects of study. Contract researchers will refine the methodologies when research is contracted out or executed under cooperative agreements.

Applied ethnographers use diverse methods such as analysis of archival and published documents and historic photographs, census taking, individual and group interviews, oral and life histories, subsistence mapping to chart changes in subsistence areas over time, cognitive analyses, site visits, participant observation, surveys, focus groups, decision charting, place name analysis, and genealogical charting. Videotaping is increasingly used to record subsistence activities or to document natural and cultural

resources for viewing by elders who cannot travel to the park. Contract ethnographers must also be experts in developing and testing appropriate sets of questions, evaluating community consultants, cross-checking documentary, observational, and oral evidence, analyzing data, and preparing reports.

3. Ethnographic Research Types

Management Policies (5:12) states: "To ensure that NPS plans and actions reflect contemporary knowledge about the cultural context of . . . ethnographic resources, the National Park Service will conduct appropriate cultural anthropological research in cooperation with park-associated groups." The following standard research types meet this need.

a. Ethnographic Overview and Assessment

This initial comprehensive background study of types, uses, and users of ethnographic resources reviews existing information and identifies new data needs. It will be programmed and conducted when park resources are known or thought to be traditionally associated with a contemporary group or groups. The overview reviews and summarizes existing ethnographic data for people and resources associated with parks; the assessment evaluates them and identifies data gaps. Information is derived primarily from existing archival and published materials and is supplemented with ethnographic interviewing of knowledgeable community consultants.

b. Traditional Use Study

Describing and analyzing traditional resource use and management regimes, this field study will be conducted and periodically updated for all parks having traditional resource users. It fills the data gaps identified by the ethnographic overview and assessment and satisfies requirements of ANILCA, specific legislation for parks in the contiguous 48 states, and global climate change and Man in the Biosphere programs for information on customary uses of cultural and natural resources. Its benefits include the baseline information needed to inform interpretive programs, monitor effects of use on renewable and non-renewable resources, reach culturally informed decisions about appropriate kinds of protection, and assess effects of restricted use on traditional users. Subsistence studies require at least one year of documentary review and intensive fieldwork in collaboration with members of the involved communities, facility with local languages, residence in the community, ethnographic interviewing, and participant observation. (See the *Natural Resources Management Guideline*, Chapters 2, 3, 4.)

c. Rapid Ethnographic Assessment Project (REAP)

REAP, a project-driven study and battery of methods including focus groups, transect walks, and community mapping, will be conducted to acquire and analyze data for planning and program evaluation decisions. It serves a manager's need to solicit community views about alternative courses of actions and to choose among alternatives in order to satisfy National Environmental Policy Act (NEPA) consultation and information requirements about effects of potential and/or planned actions on the human environment. REAP can assist in conducting social impact assessments. Work should be completed in four or fewer months, but these need not be consecutive. REAP does not substitute for the more detailed ethnographic overview and assessment or traditional use studies and may indicate the need for more prolonged work.

d. Ethnographic Landscape Study

This is a limited field survey to identify and describe the names, locations, distributions, and meanings of ethnographic landscape features. It can be combined with traditional use studies or conducted as part of other cultural landscape studies. It follows or may be combined with the ethnographic overview and assessment when gaps in the available data base indicate the need for detailed data on park ethnographic resources. Community members will be involved in site visits and ethnographic interviewing. Studies will be coordinated with the cultural landscape program, which has primary responsibility for cultural landscape identification and management.

e. Cultural Affiliation and Lineal Descent Studies

The affiliation study establishes relationships between park resources and associated past and present peoples. Lineal descent studies trace relationships between objects in park collections, or other resources,

and descendants of individuals whose remains or objects are in park collections. They are required to address the cultural affiliation and consultation requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) and other legislation, policy, and regulations that address peoples traditionally associated with park resources. Parks with Native American collections and the potential for the excavation or inadvertent discovery of Native American materials will program affiliation studies as soon as possible. Researchers will consult with NPS archeologists, curators, ethnographers, and other professionals concerned with repatriation, as well as with community members.

f. Ethnohistory

Ethnohistory—a methodology for obtaining culture-specific descriptions and conducting analyses within a historical framework—addresses dynamic relationships between parks and traditionally associated groups. The objective is to consider a people's lifeways through time so that continuities and change in land use patterns, family organization, demography, ceremonial life, and other features can be plotted in time and in variable contexts such as changing neighbors, frontiers, or economic, social, and political climates. An ethnohistory can be combined with an overview and assessment or traditional use study.

g. Ethnographic Oral and Life Histories

These are standard anthropological methods for studying development, change, and stability in human life cycles, lifeways, and the resources that support them. They involve prolonged collaboration between interviewer and interviewee, or consultant. It is imperative to initiate them as soon as possible when elderly community consultants are involved because crucial information about the community and resident lifeways is threatened daily as older residents recall their former circumstances with less clarity and changing social and economic conditions lead to new ways of life. These histories can be combined with traditional use studies and ethnohistories.

4. Ethnographic Resources Inventory (ERI)

Using data collected through ethnographic studies and consultations, each park will develop and maintain a management listing of cultural and natural features accorded significance by traditionally associated peoples. This listing will identify user groups, resource locales, and conditions; the forms and periods of use; boundaries, preferred treatments, and confidentiality concerns. It will aid in meeting legislative, regulatory, and policy requirements for identifying ethnographic resources and associated groups; in forecasting consultation needs and budgets; in notifying interested groups about anticipated planning activities; in developing appropriate public involvement strategies; and in identifying resources that require monitoring.

No exhaustive list or description is anticipated. There will be data gaps partly reflecting reluctance by associated groups to reveal information that might jeopardize the privacy and effectiveness of religious or subsistence activities or threaten burial sites. Confidentiality of data will be ensured.

Until Service-wide data categories and other inventory components are designed and tested, in consultation with traditional user groups, park management should record even casual observations of traditional resource uses.

C. Planning and Program Strategies

1. Park Ethnographic Program Strategy

The ethnographic program is a data file and set of action plans or strategies for identifying traditionally associated peoples and ethnographic resources and monitoring traditional use activities and park development to ensure that incompatible activities do not adversely affect either park resources or traditional activities. Established by each park with traditionally associated groups, the strategy also tracks consultations and progress on ethnographic studies and maintains updated information for incorporation into planning documents. The program file includes:

- a) lists of legislative constraints on and opportunities for consumptive, ceremonial, and other traditional resource uses.

- b) lists of traditionally associated groups and more recent user groups and a schedule of anticipated planning or other actions requiring consultation;
- c) a consulting plan with recommended techniques for gaining the effective involvement of park-associated groups in planning, operations, studies, and NAGPRA compliance. The plan should consider appropriate language (if community members do not prefer English), meeting places and times, names or titles and addresses of relevant contact people, and issues and programs in which the groups should be involved;
- d) consultation records that inform present and successive staff of discussions and their participants, issues and resolutions, and need for follow-up. This file will include copies of notification letters;
- e) a NAGPRA implementation plan that describes steps and schedule for identifying affiliated groups and conducting consultations;
- f) a traditional community resource management plan, prepared in collaboration with affected communities, reflecting their concerns about ceremonial, consumptive, and other access to and use of specific ethnographic resources, and treatment preferences for significant cultural and natural resources. Legislative constraints on use, permissible harvesting and other uses, resource monitoring arrangements, and NPS concurrence with community objectives should be noted. This information will be included in resources management plans;
- g) an offering plan to help parks reach decisions about the culturally appropriate treatment of offerings left by traditional religious practitioners and visitors to memorials and cemeteries. It identifies likely offerors and offering places and times and includes options for non-disturbance and for storage in accord with the offerors' wishes;
- h) a long-term research plan to identify foreseeable data needs, for example, for general management plans, and to avoid duplicating studies that make untenable demands on community elders and others, raise redundant questions, and exhaust the goodwill of community cultural experts;
- i) inter-regional research plans developed when research might involve a single group in more than one region;
- j) a portfolio of approved and current ethnographic task directives, scopes of work, research designs and associated budgets, and study packages for use in resources management plans and budget calls;
- k) a current list of applied research ethnographers with appropriate experience;
- l) a current list of interested community consultants, and communication channels such as newspapers and local radio stations;
- m) copies of special use permits and subsistence and ceremonial maps with protected information;
- n) an updated listing of ethnographic resources.

2. General Management Plans and Special Resource Studies

According to *Management Policies* (2:5): "Sufficient information will be available prior to initiating a plan. Each park will develop, gather, compile, store, analyze, and update information about natural and cultural resources and regional demographic, ethnographic, and socioeconomic data relevant to planning and management."

As soon as planning projects are identified, superintendents, ethnographers, and planners will review ethnographic information needs, assess existing data, and program needed studies. The ethnographic overview and assessment will be initiated before or during plan scoping. REAP will be initiated during scoping too so that, consistent with NEPA and NPS policies, consultations with potentially affected groups can start at the earliest possible time. Different REAP techniques will be used during different planning steps, as appropriate, and be integrated into planning schedules so that ethnographic information is available to meet policy requirements. Traditionally associated groups are a major concern, along with more recent neighboring groups and representatives of special interest and occupational groups such as fishermen.

D. Stewardship

1. Parks, Resource Integrity, and Viable Cultural Systems

Ethnographic resources offer windows on places, events, and processes that contribute to the nation's cultural vitality in several ways. On one hand, knowledge about important but poorly known aspects of American life reflected in traditional cultural and natural resources can enhance the Service's public education programs. On the other hand, access to park resources can offer associated groups opportunities to continue traditional practices and maintain traditional community roles if they wish, provided resources are not adversely affected. Peoples' beliefs, traditions, and history are taught or affirmed to new generations through legends or other oral narratives emphasizing features of park landscapes. Whenever resources in parks had been the basis of a group's economy, or spirituality, or somehow contributed and still contribute to traditional community life, parks become part of the local cultural system and contribute to the group's cultural vitality and the nation's cultural diversity. By maintaining the integrity of these ethnographic resources, the NPS helps maintain the nation's diverse physical, natural, and cultural heritages and acknowledges the human dimension of its stewardship role.

The culturally appropriate guardianship of public resources requires consulting the publics that use or may use them and incorporating their suggestions into management decisions to the fullest feasible extent.

2. Notification

Notification occurs before consultation and refers to written advisements to potentially affected groups that NPS will seek public comment on anticipated planning actions. Notification letters establish a record of public notice. Consideration should be given to using local languages. In addition to advising formally recognized community leaders, the broad spectrum of community members should be informed through local newspaper announcements and flyers placed at strategic gathering places. Radio announcements in local languages are useful when populations are widely dispersed or uncomfortable with written materials. Follow-up phone calls are recommended to selected individuals and groups who should have received written notices.

Ethnographers and local organizations can assist in identifying potentially interested local individuals or groups and relocated groups with continued interest in the area.

3. Consultation

Consultation is a process for the exchange of views and information between NPS and different interest groups or stakeholders in a planned undertaking. The process has several goals, including the short-term goal of exchanging information on a particular project or plan and the longer-term goal of establishing or reconfirming mutually beneficial interactions between NPS staff and traditionally associated communities. In effective consultations, NPS staff interact on a face-to-face basis with diverse publics to explain planned actions, discuss potential impacts, and listen to community views, concerns, and issues. In some cases, the dialogue might result in negotiating differences of opinion. Consultation is undertaken not only for NEPA, NAGPRA, and National Historic Preservation Act compliance, but to expand community input into interpretive programs.

Several factors affect the outcomes of consultation, including (a) group social, cultural, and political dynamics, (b) meeting locations and times, (c) communication styles and other variables, and (d) past relationships between NPS and the consultants and among consultants. In inviting community members to consult, for example, consider whether tribal, ethnic, or age groups should be mixed or consulted separately in small meetings. The costs of conducting several small meetings instead of one large meeting are often offset by the positive interactions and useful information they encourage. Take into account appropriate days, hours, seasons, and the need for privacy in selecting places and times. In selecting suitable times and places, consider local transportation patterns, men and women's work schedules, and constraints on consultant time, for example, because of obligatory seasonal ceremonial activities. Communication is another concern: Is English the best language choice for the group? Do written materials accommodate the readership? Are graphic and verbal symbols culturally suitable? Were ceremonial needs and hospitality considered?

Consultation partners should include formal leaders as well as members of the larger community. To meet the Service's government-to-government obligations to Indian tribes and trust territory governments of the Pacific, the NPS will formally consult their government representatives. In addition, tribal government support should be sought for speaking with traditional elders and the community at large. In accord with policy and ANILCA provisions, the NPS will also consult Alaska Native villages and corporations. Hawaiian communities, Native Hawaiian organizations, and groups elsewhere in the Pacific will be consulted when NPS actions affect them.

4. Compliance

Consultation and ethnographic data help meet compliance requirements of legislation and NPS policies, including

- a) the National Environmental Policy Act (NEPA), when NPS actions might affect the interests (subsistence, religious, residential, etc.) of tribes and other communities;
- b) the American Indian Religious Freedom Act (AIRFA), when NPS actions might affect Native American religious interests;
- c) the Alaska National Interest Lands Conservation Act (ANILCA), when NPS actions might affect subsistence activities and associated ways of life;
- d) the National Historic Preservation Act (NHPA), when NPS actions affect ethnographic resources with National Register eligibility;
- e) the Archaeological Resources Protection Act (ARPA), when archeological activities might affect resources of concern to Native Americans;
- f) the Native American Graves Protection and Repatriation Act (NAGPRA), when NPS collections contain materials potentially associated with Native Americans, when planned archeological excavations might affect Native American interests, and when human remains and associated grave goods are discovered accidentally;
- g) the Presidential Memorandum on Government-to-Government Relations with Native American Tribal Governments, when NPS actions might affect the interests, trust resources, and tribal government rights of federally recognized tribes;
- h) Executive Order 13007 on Indian Sacred Sites, when NPS actions might affect the physical integrity of sacred sites, and both access to and ceremonial use of these sites by American Indian religious practitioners in federally recognized tribes.

5. NAGPRA

NAGPRA resulted in substantially changed relationships between the NPS and American Indian tribes, Alaska Native villages and corporations, and Native Hawaiian organizations. The law gives park managers new responsibilities with regard to these groups with respect to the disposition of certain objects in park museum collections, planned excavations on park lands, and inadvertent discoveries on park lands. The NPS assumed responsibilities for summarizing unassociated funerary objects, sacred objects, and objects of cultural patrimony in its collections; for inventorying human remains and associated funerary objects; for consultation; and, under specified conditions, for the repatriation of certain Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony. At the same time, lineal descendants, tribes, and Alaskan and Hawaiian entities were accorded new rights to these objects. The NPS completed its summary by the November 16, 1993, deadline and its inventory by the November 16, 1995, deadline.

Instructions for implementing NAGPRA government-wide are in 43 CFR Part 10. NPS-specific guidance for implementing NAGPRA is in Appendix R of this guideline.

6. Treatment

Consultation will consider associated groups' treatment preferences for ethnographically significant resources. Implementing those preferences might not always be feasible, but they should be identified and resolutions negotiated when NPS practices and traditional preferences differ. Traditional users, Navajo for example, might prefer the intentional deterioration rather than preservation of hogans or homes in which

someone died. Maintaining the physical integrity of the few existing park hogans is important for ethnohistory and architecture, but deterioration could be more important in responding to local religious concerns.

7. Protection

Consultations with traditional users will identify measures they believe appropriate for safeguarding ethnographic resources. Differences between their preferences and NPS practices will be negotiated. It might be necessary, for example, to reroute trails so that sacred places are not threatened by excessive visitor use. Park maps should avoid identifying actively used sacred cultural and natural resources and avoid drawing attention to the present sacred uses of massive structures, like those at Mesa Verde, without the concurrence of traditionally associated groups.

8. Registration

Ethnographic resources eligible for listing in the National Register as traditional cultural properties will be identified by ethnographic studies, not isolated surveys and casual interviews. Systematic consultations with associated groups, and studies that include consultations, will address the implications of nominating traditional sacred places to the National Register and identify the groups' preferred forms of treatment for the resources whether or not they are nominated. (For more information see National Register Bulletin 38, *Guidelines for Evaluating and Documenting Traditional Cultural Properties*.)

9. Use

The resource management regimes traditionally evolved by local communities include preservation and conservation practices that promote sustainable use when the size of local populations and resource bases remain stable. Where law, regulation, or policy permit subsistence or other traditional use, traditional use studies establish the baseline for monitoring short- and long-term effects of use and effects of park programs on users. Parks should apply that information to the development of management strategies that integrate traditional practices and knowledge.

Where limited collection of sacred plants for personal use is not explicitly allowed but traditional religious practitioners require plant materials for spiritual purposes, longitudinal studies of use should be conducted to determine its effects on plant communities and to develop use strategies that maintain the cultural integrity of the resources. Park-specific procedures or regulations for limited sacred plant collection for personal use should be considered where plants are not endangered or threatened, collection is not explicitly prohibited by law, and collection will not demonstrably disrupt the ecosystem.

NPS policy (*Management Policies* 8:10) permitting American Indians to use peyote in parks for sacramental purposes exemplifies allowances for special cultural use. This is consistent with the American Indian Religious Freedom Act amendments of 1994 that make it lawful for members of American Indian tribes and Alaska Native villages to use, possess, or transport peyote for bona fide traditional ceremonial purposes associated with the practice of a traditional Indian religion. The United States and the states cannot prohibit these activities, which occasionally occur in parks in the Southwest and Rocky Mountains.

10. Education

Developing culturally appropriate information on ethnographic resources and associated peoples requires their early involvement in the preparation of films, maps, brochures, exhibits, and other public programs. Park staff should review interpretive materials for cultural sensitivity and ethnographic accuracy and consult involved communities about the appropriateness of images and information. Harpers Ferry Center exhibit specialists should be informed of the involved communities' concerns. Ethnographers and ethnographic materials should be consulted for background data.

Materials referring to diverse American ethnic and racial groups should reflect the names those groups prefer. For example, although the generic term "Native American" is used in referring to the large body of America's indigenous people, including American Indians, Eskimo, Aleuts, and Pacific Island peoples, many tribes generally prefer to be called "American Indian" when addressed as a group. More specific nomenclature should be adopted to identify particular tribes, tribal groupings, alliances, or confederations such as the Navajo Nation or Lakota Nation if the involved people so indicate.

11. Community Partnerships

Policy provisions for cooperative relationships between parks and neighboring and traditionally associated communities can be implemented through cooperative agreements, memorandums of understanding, and various formal or informal boards, commissions, and meetings. These offer mechanisms for establishing mutually beneficial and stable relationships that continue despite the succession of changing community leaders and park managers. Memorandums of understanding with Native Americans should be considered as a means of expeditiously addressing planning and NAGPRA-related issues and responding to the President's 1994 memorandum encouraging effective consultations and continuing cooperation on a government-to-government basis with Native American tribal governments. Memorandums can further systematic cooperation for purposes of park interpretation, training, internships, and exchanges to enhance cross-cultural learning.

CHECKLIST FOR MANAGEMENT OF ETHNOGRAPHIC RESOURCES

RESEARCH:

- Appropriate studies and consultations document ethnographic resources and uses, traditionally associated people and other affected groups, and cultural affiliations to park resources.
- An annotated bibliography of park-related ethnographic works is maintained.
- Researchers formally collaborate with community cultural experts.
- Studies identify ethnographic resource data, interpretive uses, and resources with National Register potential as traditional cultural properties.

PLANNING:

- REAP and other consultations with traditionally associated groups are initiated during scoping.
- REAP is employed to evaluate alternatives and assess planning impacts on ethnographic resources and associated user groups.
- Planning documents contain current information on traditional resource users and uses, the status of ethnographic data, and the legislative, regulatory, policy, or other bases for use.

STEWARDSHIP:

- Traditionally associated groups and neighbors and the legislative, regulatory, or policy bases for relationships with them are identified and known to park staff.
- Statements for management address traditionally associated people, ethnographic resources, and resource uses.
- The park ethnographic strategy, including consulting, offering, treatment, and reburial plans, is kept current.
- The ERI is maintained.
- Systems exist to monitor effects of use on cultural and natural resources and effects of park plans on authorized uses and traditional users.
- Cultural affiliations of museum objects are known, and repatriation processes are implemented.
- Performance standards of specific park cultural resource specialists include responsibility for partnerships with traditionally associated groups.