CONGAREE NATIONAL PARK: AN EVOLVING APPROACH TO MANAGING NATURE

AND HISTORY IN THE NATIONAL PARK SERVICE

by

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(Under the Direction of Cari Goetcheus)

ABSTRACT

Congaree National Park, located in South Carolina, possesses the last remaining old growth forest in the American South. Congaree is managed as a wilderness area, but the NPS also has a stewardship requirement to the cultural resources within park boundaries. Congaree struggles to balance its wilderness and cultural resource management responsibilities. This thesis will examine the broader conflict between nature and history within the United States National Park Service. It also will explore the factors that initially shaped Congaree's management policy and then consider how policy evolved with respect to the relationship between wilderness and cultural resource management. Finally, this thesis will explore Congaree's pathway to a balanced, integrated, and comprehensive management approach for cultural resources and wilderness values.

INDEX WORDS: Cultural Resource Management; Natural Resource Management; United
                 States National Park Service; Congaree National Park; Wilderness,
                 Environmental History; Adaptive Management

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DEDICATION

This work is dedicated to my family and friends. Thank you for always supporting me.

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PREFACE

Until recently, I did not see the relationship between cultural and natural resources as a source of conflict. My experience growing up in a rural area led me to see the relationship between history and nature as a continuum in which each played a role in shaping the other to create the landscape. Decaying farms were everywhere in my home of Jasper County, Georgia. These were relics of the past that I found aesthetically pleasing as well as academically interesting. Old cotton terraces, overgrown peach and pecan orchards, and trees growing along old fence lines and road beds created landscapes that are today considered natural, but also show history's fingerprints. To my mind these places had one story, but it was one of both history and nature.

In my undergraduate study of environmental history, I returned to this topic as I examined plantation rice cultivation on the Georgia coast. The rice agriculture that once dominated the tidewater region now exists only as a ghost on the landscape. My research at Howfyl-Broadfield Plantation Historic Site showed a landscape managed as a natural area, but interpreted largely as a historic one. The fields no longer produced rice, but the system of canals and dikes remained visible and shaped the ecology that developed on the land after rice cultivation ceased. My research focused on how rice cultivation shaped the land, rather than how Howfyl-Broadfield Plantation Historic Site managed and interpreted the landscape. In retrospect, I believe the park did a good job of protecting history and nature, as well as providing interpretation of both elements. However, that historic site was created and managed for the

purpose of interpreting the former plantation. This thesis will focus on how National Parks created primarily for the conservation of natural features manage cultural resources.

My experience with cultural resource management at a large natural resource- and wilderness-focused park began during an internship at Everglades National Park in 2011. With over 1.5 million acres, Everglades National Park contains several unique and rare ecosystems and supports numerous endangered plant and animal species. During my time at Everglades National Park, I never thought that less should be done for the park's natural resources and wilderness values, only that more could be done for the park's no less important (in my opinion) cultural resources. These resources are found throughout the park and range from historic and prehistoric Native American archeological sites to Cold War era military installations.

In my experience, Everglades National Park had done a good job of completing research on cultural resources in the form of baseline studies for archeological and historic resources. The park also was beginning to embrace the study of cultural landscapes. However, the next step, which involved stewardship and interpretation cultural resources, did not fully incorporate the breadth of available information. The site of a nationally-significant HM-69 Nike Missile Base, which is important to Cold War and Cuban Missile Crisis history, was open and interpreted to the public on a limited basis, but needed restoration work. The historic bunkers and other structures associated with the missile base were yielding to the sub-tropical environment, while the funds and staff were not available at that time to stabilize the structures to protect their integrity for the "enjoyment of future generations."

During my time at Everglades National Park, I became interested in understanding why hundreds of millions of dollars were being spent to rehabilitate the environment through the Everglades Restoration Program, but thousands could not be spent to stabilize a handful of

historic structures. I wanted to better understand what cultural resource management in the National Park Service meant and what challenges cultural resource management faced on both the national and park level.

While at Everglades National Park, I also learned that the idea of wilderness is one of the most powerful elements shaping how cultural and natural resource management interact in the United States, especially in large natural-resource focused parks. The impact of the Wilderness Act of 1964 and the growth of wilderness ideology in the United States contributes to the idea that cultural resources are somehow out of place in natural areas. However, as writers such as William Cronon point out, it is impossible to understand the full story of a park or a landscape without acknowledging the human history of a place. In this thesis, I hope to explore how a particular park, Congaree National Park, balances management of its cultural and natural resources. This thesis will also consider how Congaree National Park can apply an environmental history approach to develop management policy that fosters an understanding of the park as a place of history and nature.

CHAPTER 1

INTRODUCTION

The U. S. National Park Service (NPS) holds a stewardship responsibility for both cultural

and natural resources. The National Park Service's responsibility to manage and conserve these

resources comes from the 1916 Organic Act, which created the agency and its purpose. The

Organic Act states that the purpose of the NPS is "to conserve the scenery and natural and historic

objects and wildlife therein and to provide for the enjoyment of the same in such a manner and by

such means as will leave them unimpaired for the enjoyment of future generations."[1] From the

beginning, the Organic Act created an ongoing internal struggle between these various duties, as it

required protection of all resources, but the act did not specify what should be done when there is

conflict between nature and history or use and preservation.

While the Organic Act defines the NPS's primary mandate, subsequent legislation and

policy decisions shaped characteristics of both cultural and natural resource management, as well

as the relationship between the two. This legislation and policy is both complex and open to

interpretation, which provides an opportunity to evaluate and criticize how individual parks

implement national-level policy as well as the role site-specific environmental history plays in

guiding park cultural resource management policy. Additionally, the study of this legislation and

policy, and its interpretation at the park level, shows the evolution of the conflict between culture

and nature.

For nearly a century the NPS has provided an international example of good resource

management. However, the impact of management policies on the cultural resource at individual

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[1] National Park Service Organic Act, 16 U.S.C. § 1 (1916).

parks draws into question the effect on cultural resources from national legislation and NPS-wide policy, which often favors natural resources and wilderness. In light of the NPS's coming centennial anniversary, and at the beginning of a new century, an evaluation is required of the NPS's track record in meeting its most fundamental responsibility of resource conservation for future generations.

This thesis considers the progression of legislation and NPS-wide policy related to park level resource management since the National Park Service's creation. The National Park Service is responsible for balancing many relationships, examining the progression of legislation and policy provides an idea of how the NPS's interpretation of its responsibility has changed. In particular, the idea of changing policy interpretation will be applied at the park-level based on the premise that there is the greatest opportunity for flexibility in management policy at the park level. By examining management policy at the park level this thesis will attempt to achieve an understanding of how nature and culture relate at the park level, and how a park's specific environmental history may shape that relationship.

The importance of the role of wilderness and a desire to understand how site-specific environmental history shapes park cultural resource policy guided the selection of Congaree National Park as the main case study of this thesis. The idea of an untouched wilderness is present at Congaree National Park, and as such provides an opportunity to look at the ways in which the park's story and balance between culture and nature can be improved. Congaree National Park also has a human history that was profoundly shaped by interactions with a unique and challenging floodplain environment. This characteristic provides an interesting way to explore how environmental history can unite human and natural stories within the context of Congaree National Park. Congaree National Park also demonstrates the progression in the broader evolution

of wilderness management in the National Park Service and American Society as a whole. The progression that took place in Congaree's policy is indicative of the changing approach to managing cultural, natural, and wilderness resources in national legislation and NPS-wide policy.

<div align="center">Research Question</div>

This thesis considers the relationship between culture and nature and the question of how site-specific environmental history impacts cultural resource management policy. For the purpose of this thesis 'site-specific environmental history' refers to the human and natural history within and adjacent to park boundaries. By concentrating on Congaree National Park this thesis provides a focused window into the larger question of the relationship between cultural and natural resource management. This thesis hopes to contribute an example of how a wilderness-focused park can better incorporate site-specific environmental history into park planning and cultural resource management. In turn, this example can be applied in other parks where cultural and natural resources overlap to improve cultural resource management. For the purpose of this thesis, the term wilderness refers to areas managed as wilderness, either potential or designated. This thesis also uses the term natural resource management to refer to management activities related to natural aspects, whether in areas managed as wilderness or not.

The primary research question of this thesis asks, how has the relationship between history and wilderness evolved at Congaree National Park and how is this change expressed in the park's policy and management? This question requires several additional sub-questions. These include: How has Congaree's policy evolved over time, and how does that policy reflect changes in park management's interpretation of park-enabling legislation, national legislation, and NPS-wide policy? How does Congaree's management policy shape the park's broader narrative? What is the

future of resource management policy at Congaree? How can environmental history be applied as a management tool at Congaree to unite human and natural narratives?

To answer these questions and provide context for the study of Congaree National Park, this thesis will first address questions related to the evolution of the debate between cultural and natural values as expressed in NPS policy and management. These questions include: what is the history and development of NPS cultural and natural resource management policy; how is NPS cultural resource management policy and national legislation manifest at the park level; and, how does cultural resource management relate to natural resource management and wilderness at the park level? These questions explore the background of legislation and policy, as well as the relationship between natural resources and wilderness philosophy and cultural resource management policy. Throughout these inquires it is also important to consider how history and cultural resource ideology impact natural resource management.

Methodology

This thesis approaches the research questions first through a review of the necessary contextual legislative, policy, historical, and cultural literature related to resource management at Congaree National Park. The literature review focuses on three primary areas: NPS policy and relevant legislation, the history and development of resource management policy in the NPS, and the development of wilderness ideology in the United States and its relationship with cultural resources. This exploration provides a better understanding of how cultural resource management functions in the National Park Service and describes the extent and consequence of the relationship between cultural and natural resource management and wilderness values in the NPS. Following the literature review, this thesis reviews Congaree National Park's history and policy to

understand how the broad and sometimes abstract contextual materials covered in the literature review come to bear in park-level management policy and action.

The examination of Congaree National Park's history and policy begins at the national level through a consideration of legislation and National Park Service policy. These two aspects, legislation and policy, provide the foundation for resource management throughout the National Park Service. The literature review considers the history of cultural and natural resource management by the NPS to explore how the NPS's current approach to resource management developed. The source material relating to national legislation and NPS-wide policy includes legislation and policy documents as well as secondary analyses of those documents. These range from the 1916 Organic Act through the most recent NPS *Management Policies* and Director's Orders. Focusing on the primary source material allows analysis of how these documents evolved and how this evolution reflected the larger social debate between cultural and natural values. Examining primary source material also provides a comparison of legislation and policy's intent with the vagaries of interpretation and implementation of that legislation and policy at the national and park-level. Secondary sources will be used to provide context for legislation and policy.

In evaluating the relationship between cultural and natural resource management, secondary sources describe the current academic understanding of that relationship and its influence on park resource management policy. In particular, this material considers how environmental history provides a approach to understand how culture and nature interact.

These environmental history sources also cover the impact of wilderness on the relationship between culture and nature. Apostle Island National Lakeshore and Point Reyes National Seashore are evaluated as part of this study to provide a contextual understanding of how these national issues are manifest in park-level policy and action. They also provide an

opportunity to incorporate the work of historians William Cronon, James Feldman, and Laura Watt among other researchers focused on the relationship between culture and wilderness. This section also considers the importance of balancing both sides of the relationship between culture and wilderness.

Finally, the literature review examines recent changes to the dynamic between culture and nature. This section considers both new NPS policy guidelines, such as *A Call to Action,* as well as academic sources examining the issue of change in NPS policy. These sources elaborate on the value that an integrated resource management plan can provide to both culture and nature. The most recent additions to NPS-wide policy will be addressed in the recommendations section of this thesis to illustrate the guidance this policy provides to Congaree National Park.

The next step in this thesis is to consider how these various factors and ideas impact resource management at Congaree National Park and the ways in which environmental history plays a role in the park's management of specific resources. Congaree National Park provides an excellent topic of study because it is a natural resource focused park with management policy dominated by wilderness interests. Although Congaree National Park was created to protect natural resources, it still contains cultural resources. This initial imbalance in the park's valuation of resources offers an opportunity to consider how cultural resources are managed in this context.

The information used to complete the study of Congaree focused on primary source policy and management documents. Beginning with Congaree's enabling legislation and working forward to current policy provides an opportunity to examine how park policy evolved and offers a methodology to look for existing examples of site-specific environmental history in park policy and management. This will include both published and unpublished documents related to Congaree policy and management. This material will provide a thorough progression of

Congaree's policy and demonstrates how culture and nature relate at Congaree, as well as the extent to which site-specific environmental history is evident in Congaree's management policy.

The study of Congaree National Park also creates a point of reference for analysis and recommendations related to cultural resource management at the park level and the role of site-specific environmental history, cultural, and wilderness themes in management policy. This affords the opportunity to evaluate the degree to which Congaree is successfully meeting legislative and NPS-wide policy requirements with regards to cultural resource management, and also considers Congaree's interpretation of its own enabling legislation. The recommendations consider what aspects of cultural resource management can be improved and how the balance between wilderness and culture can be improved at the park. This thesis will not consider what changes can be made at the national level, but will try to provide meaningful recommendations for improving those aspects over which the park has control.

This thesis is limited in its scope by a focus on management policy and the use of policy documents as the primary source material. This thesis does not consider archival resources, such as Superintendents Annual Reports or public comment, which would offer additional insight into the factors that shaped Congaree National Park's policy and management. This thesis also does not review interpretation plans or other aspects of park management such as law enforcement. Although this thesis does not consider all factors that contribute to the development of management policy as Congaree National Park, by concentrating on the major policy documents this thesis is able to meet its primary goal in evaluating the evolution of management policy at Congaree National Park. Future research could incorporate additional elements to provide a more complete picture of Congaree National Park.

Thesis Organization

To offer the reader an understanding of the history of resource management in the NPS, NPS-wide policy, and national legislation relevant to the examination of Congaree National Park, Chapter 2 provides a literature review of these topics. Chapter 3 examines the history and progression of management policy at Congaree, with consideration of the relationship between cultural, natural, and wilderness management. Chapter 4 provides an analysis of Congaree's policy progression and considers scholarly criticism of the park's management practices. Chapter 5 synthesizes the information from the literature review, study of Congaree, and analysis of the park's management to offer recommendations for the improvement of Congaree's management policies and direct the integration of environmental history into the park's narrative. Chapter 5 also provides a conclusion relating Congaree to the NPS-wide need to integrate human history and wilderness, and summarizes Congaree's pathway to improved management practices.

CHAPTER 2

LITERATURE REVIEW

The policy guiding natural and cultural resource management (CRM) in the National Park Service is at the center of understanding how environmental history may shape cultural resource management. The NPS has multiple responsibilities to the resources under its care. These include the management of those resources, as well as the interpretation of those resources to the public. The NPS, like other federal land management agencies not only protects resources, it also influences how the public perceives the resources under its care. Moreover, the NPS has a responsibility to share an accurate and comprehensive understanding of the areas under its care. It is important to evaluate both of these aspects of the NPS's duty to reach a conclusion about the relationship between cultural, natural, and wilderness management.

The scope of this thesis concentrates on cultural resource management policy, but also considers natural resource and wilderness management policy when it influences the management and interpretation of cultural resources. This involves examining policy documents as well as national legislation to understand how the NPS's management structure operates and the degree to which individual parks can influence their own cultural resource management policy. In addition to evaluating these primary documents, it is important to consider academic sources that study the relationship between cultural resource and wilderness management. In particular, these sources offer insight into, and criticism of, cultural resource management policy in the NPS.

National Park Service: Management Foundations

The history of NPS resource management is tied to the development of the national park idea and the work of early park leaders to define the purpose and management role of national parks. The question of what motivated early park leaders and the national park movement during the late nineteenth and early twentieth-centuries provides a reference for the initial purpose of management in the national parks, even prior to the creation of the National Park Service. In *Preserving Nature in the National Parks: A History,* Richard West Sellars approaches this question under the premise that today science, and in particular ecological science, increasingly shapes how the NPS manages natural resources. However, Sellars points out that for the early parks, science and natural resource management in general was not the focus of early park managers.[2] Sellars argues that the pressure to develop national parks for tourism and public use motivated early park leaders and determined their management of natural and cultural resources.

The national park movement emerged during a period of American history in which big business and the federal government were partners in the consumption of the West's natural resources. Sellars writes that despite the "Guilded Age's rampant exploitation of pubic land, the concept of federally managed parks protected from the extractive uses typical of the late-nineteenth-century American west abruptly gained congressional support."[3] This is surprising for a time in which the federal government granted huge tracts of land to railroad, homestead, mining, and timber interests.[4] Big business played a role in convincing congress to protect many of the areas that became national parks, beginning with Yellowstone National Park. Western railroad companies pushed congress to protect Yellowstone for what Sellars refers to as "corporate profit

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[2] Sellars, Richard West, *Preserving Nature in the National Parks: A History* (New Haven: Yale University Press, 1997), 3.
[3] Sellars, 7.
[4] Sellars, 7.

motives."[5] The railroad companies foresaw developing resort-style amenities to entice visitors to the park, who would need to buy tickets on their railroads to reach the park. Political pressure by the railroads led to the establishment of other early parks including Sequoia, Yosemite, Mount Rainier, and Glacier National Parks.[6]

Yellowstone National Park and other nineteenth-century national parks were an experiment in a new "land use type" that protected land to advance tourism as a utilization of public land, rather than other land uses such as timber, agriculture, or mining.[7] Sellars notes that since "tourism and public enjoyment provided a politically viable rationale for the national park movement [the] development [of the parks] for public use was intended from the very first."[8] In turn, this desire to foster tourism development shaped the management systems that emerged and guided the development of parklands for visitor use.

The vision of the national parks as places managed for tourism continued into the 1910s as political and public support grew for a new national parks bureau. This desire to manage parks for public recreational use contrasted with the resource management approach of the Forest Service in National Forests.[9] Proponents of a national parks bureau wanted a system that managed public lands to "nurture and protect" for the purpose of recreational use, rather than the standard approach to natural resource management at that time, which favored utilizing land for its tangible commodities.[10] Although the Forest Service also managed for the public use and public good, supporters of a national park system argued that the Forest Service's approach was exploitative.

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[5] Sellars, 9.
[6] Sellars, 12.
[7] Sellars, 10.
[8] Sellars, 16.
[9] Sellars, 35.
[10] Sellars, 27.

The National Park Service Organic Act of 1916 was the culmination of the national park movement and the ongoing social dialogue of nature's value. The process guiding the language in the Organic Act also demonstrated the desire for the newly created National Park Service to be a tourism and development agency that conserved natural scenery, rather than an agency solely devoted to natural resource preservation. From 1910 to 1915, drafts of the Organic Act focused on the recreational use and the aesthetic attributes of the national parks.[11] The effort to define the statement of purpose for the Organic Act was led by landscape architect Frederick Law Olmsted, Jr. Sellars writes of Olmsted that, "Protecting the majestic national parks landscapes through restricted, judicious development was [his] primary concern. His final statement of purpose… was thus in accord with the widely held concept of national parks as scenic pleasuring grounds."[12] Similarly, Stephen Mather and Horace Albright believed that the Organic Act and the National Park Service should be utilitarian and satisfy the need for unified management across the parks.[13]

Stephen Mather, who became the first Director of the National Park Service, believed that the Organic Act provided a "double mandate" for the NPS that directed the parks to be both used and preserved.[14] This double mandate was manifest in Mather's early management of the NPS through the planning and development of new parks, as well as the creation of an organizational structure for the NPS. In many ways the evolution of NPS management since the agency's creation is a reflection of changes in the way the park service, and society as a whole, approached this double mandate.

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[11] Sellars, 39.
[12] Sellars, 41.
[13] Sellars, 43.
[14] Sellars, 45.

The first management guidelines for the NPS came in 1918 with the Lane Letter from Secretary of the Interior Franklin Lane and echoed the double mandate.[15] The Lane Letter was written by Albright and reflected both his and Mather's views of how the NPS should be managed. The letter itself included guidance not covered in the Organic Act and gave Director Mather the ability to move forward in shaping the NPS.[16] The Lane Letter stated that all NPS action was "subordinate to the duties imposed upon [the NPS] to faithfully preserve the parks for posterity in essentially their natural state."[17] However, the letter also allows limited logging and grazing, as well as development such as roads, buildings, recreation, education, and concessionaires among others.[18]

The next major policy direction for the NPS was the 1925 Work Letter from Secretary of the Interior Hubert Work.[19] The Work Letter reiterated many of the Lane Letter's utilitarian aspects and acted in part as a defense against the resource commodity management approach of the U.S. Forest Service.[20] The utilitarian aspects of the Lane and Work Letters showed an early park service that was managed as a development agency. The Organic Act and policy letters guided that development, and established that the essential motivation of early park leaders was to increase accessibility to the parks and provide for the visitor's experience. This early direction shaped the evolution of the NPS as an agency focused visitor use, rather than resource management. This approach to managing the national parks did not begin to change until the late 1960s.

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[15]Dilsaver, Lary M., ed, *America's National Park System: The Critical Documents (*Lanham: Rowman & Littlefield Publishers, Inc., 1994), 10.
[16] Dilsaver, 10.
[17] Dilsaver, 48.
[18] Dilsaver, 49-51.
[19] Dilsaver, 62.
[20] Sellars, 57.

Under the guidance of Mather and Albright, management of park natural resources was secondary to development within the parks. Sellars writes that Mather believed "that without facilities to accommodate the public, a national park would be merely a wilderness, not serving the purpose for which it was set aside, not benefitting the general public."[21] This was not an indication that Mather believed scenery and nature were not significant, only that the purpose of scenery and nature was public use, and that public use was only possible with reasonable development. Under Mather's direction natural resource management was a function designed to support public use through predator control, landscape design, and scenery management.[22]

During the 1920s and 1930s, Mather and Albright also worked toward creating a unified national park system by shaping the park planning process. In Office Order No. 228: Park Planning, Albright clarified the role of the park Superintendents as administrators of planning at the park level.[23] Albright also described the primary method of coordinated park planning in the form of five-year plan, known as Park Development Plans. These planning documents were precursors to the General Management Plans used by the NPS today and provided holistic plans for park development and management.[24]

Although natural and cultural resources were not serious determining factors in early park comprehensive planning, the legacy of comprehensive planning continues to shape NPS management today. It is important to recognize the precedent early NPS-leaders set of focusing on recreational use and accessibility as the purpose of the national park system. It is clear from the early documents portraying the national park movement, the creation of the Organic Act, and the early management of the NPS that the Park Service was created to make parks accessible and

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[21] Sellars, 63.
[22] Sellars, 50, 71.
[23] Dilsaver, 99.
[24] Dilsaver, 99.

usable for visitors, including through recreation and education. This aspect is particularly

important to the current conflict between natural and cultural resources in terms of what park story

is cultivated and shared with the public. Without accessibility to resources, either natural or

cultural, the responsibility of the NPS falls short of the precedent established by its founders.

However, if that accessibility cannot be in person, it must at least be shared through interpretation

and education.

Impact of National Legislation

In addition to the precedents set by early park leaders, this thesis considers national

legislation related to NPS cultural resource management, as well as the impact of natural resource

management and wilderness legislation on how the NPS manages cultural resources. The National

Park Service Organic Act of 1916 and its amendments require consideration to understand the

basis of NPS cultural resource management policy. The Preservation of Historic Sites Act of 1935

and the National Historic Preservation Act of 1966 (NHPA) provide more guidance to the NPS in

terms of its responsibility to protect cultural resources. The National Environmental Policy Act,

similar to the NHPA, mandates a review and evaluation process that requires the NPS to evaluate

the environmental impact of both NPS projects and planning. Finally, the Wilderness Act of 1964

will be evaluated for its impact on the preservation of cultural resources and dissemination of

human history located in wilderness areas. National legislation was intentionally vague, allowing

the NPS and individual parks to be the creators of more specific policy. The policy developed by

the NPS in reaction to this legislation, will be discussed in the following section.

The earliest national legislation to play an important role in the creation and management

of national parks was the 1906 Antiquities Act. A desire to protect cultural resources, especially

archeological sites and artifacts, motivated the Antiquities Act's creation. In particular the Antiquities Act was a response to the threat to the land that would later become Mesa Verde National Park.[25] The Antiquities Act allowed the President to set aside national monuments for the preservation of "history, prehistory, or science." The act also stated that the monument should be no larger than necessary for the preservation of the resource, and imposed penalties for those who removed or damaged artifacts from federal land.[26] However, as Sellars notes, "Other than these stipulations, the act gave no directions for day-to-day management of the monuments."[27]

Although the Antiquities Act provided explicit protection for cultural resources, early on the act was also used to protect scenic lands, such as the Grand Canyon, and protected much larger areas than the act originally intended.[28] The national monuments were, at least for a time, less concerned with tourism and development, than resource protection. Despite this tendency, the act imposed no actual policy of limited use or strict preservation.[29] Like other national legislation, the Antiquities Act provided little management direction. However, the Antiquities Act did set an important precedent of the preservation and protection of cultural resources as part of the federal government's duty. While the Antiquities Act focused on cultural resources, the National Park Service Organic Act sought to find a balance between the duty to protect both cultural and natural resources.

The National Park Service Organic Act of 1916 reflects a particular set of values and ideas about the NPS's intended character. However, the act contains little specific direction, leaving the act to the interpretation of the Department of the Interior and the National Park Service. The best known aspect of the act, and the part closest to a management mandate, is the statement of

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[25] Sellars, 13.
[26] Sellars, 13.
[27] Sellars, 13.
[28] Sellars, 14.
[29] Sellars, 14.

purpose, which reads, "the purpose [of the NPS] is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."[30] Later amendments to the Organic Act, including the General Authorities Act of 1970 and the 1978 "Redwood amendment" strengthened the NPS's connection to the Organic Act's statement of purpose. The General Authorities Act states that "though distinct in character, [the National Parks] are united through their inter-related purposes and resources into one national park system as cumulative expressions of a single national heritage."[31] These amendments also reiterate that NPS resources should be managed for the benefit of the public.[32]

Later amendments to the Organic Act provide more direct instruction for the management procedures of the NPS. This includes the addition of the requirement to complete General Management Plans, which should include plans for the preservation of park resources, development plans, visitor information, and any potential alterations to park boundaries.[33] However, in terms of shaping actual cultural resource management policy, the Organic Act and various amendments enable the NPS to develop specific policy, rather than dictating the content of that policy. This opens a pathway for additional legislation, such as the National Historic Preservation Act and Wilderness Act, and NPS policy to define the characteristics of cultural resource management policy.

The Preservation of Historic Sites Act of 1935 (PHSA) shaped the NPS's early approach to cultural resource management. The precursor to the National Historic Preservation Act, the PHSA provided specific mandates for the NPS related to cultural resource management. The act required

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[30] National Park Service Organic Act, 16 U.S.C. § 1 (1916).
[31] General Authorities Act of 1970, Pub. L. No. 91-383, 84 Stat. 825 (1970).
[32] General Authorities Act of 1970, Pub. L. No. 91-383, 84 Stat. 825 (1970).
[33] National Park Service Organic Act, 16 U.S.C. § 1A-7 (1976)

the collection of "drawings, plans, photographs, and other data of historic and archeological sites, buildings, and objects." This portion of the act created the Historic American Buildings Survey (HABS) program. Later amendments created the Historic American Engineering Record (HAER) and Historic American Landscapes Survey (HALS) program.[34] The act also mandated that the NPS "restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archeological significance."[35] The act also directed the NPS to operate and manage historic and archeological resources for the public benefit, including the creation of educational programs to share historical and archeological information with the public.[36]

The PHSA provides the NPS with a responsibility not only to document the historic and archeological resources under its care, it also requires the NPS to preserve those resources, provide public accessibility, and offer educational programs and information about those resources. This act creates a strong directive for the NPS to treat all cultural resources uniformly and communicate park history with the public. The PHSA and later amendments do not include guidance for the management of cultural resources located in natural areas. This could be interpreted to mean that cultural resources in natural areas and wilderness deserve the same treatments as those in more publicly accessible areas. However, the lack of guidance by the PHSA creates an area of unknown for both cultural and natural resource managers. This creates a situation in which management is likely to default to more direct guidance, such as the Wilderness Act, or to management's personal views on a particular resource.

The PHSA was a product of the New Deal Era and came at a time when the NPS acquired many national monuments previously controlled by the U.S. Forest Service, and all battlefields

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[34] Dilsaver, 132.
[35] Dilsaver, 133.
[36] Dilsaver, 133.

and memorials administered by the War Department.[37] This demonstrates Congress' intention that the NPS be the primary manager of publicly-held cultural resources and provided the PHSA as guidance for how to manage newly-acquired cultural resources. The PHSA and acquisition of the War Department's parks also communicates the desire for the NPS to provide uniform management of cultural resources regardless of setting. By laying out one set of directions for cultural resource management and establishing the NPS as the primary holder of historic sites in the United States, Congress reiterated the NPS's stewardship responsibility to cultural resources as first described in the Organic Act.

The National Historic Preservation Act of 1966 with various amendments through 2006 provides the NPS with guidance and requirements for stewardship of cultural resources under the agency's care. Congress enacted the NHPA and the 1980 amendments, which incorporated Richard Nixon's Executive Order No. 11593, based on the idea that the "true spirit and direction of the Nation [were] founded upon and reflected in its historic heritage" and that the "historic properties significant to the Nation's heritage [were] being lost or substantially altered, often inadvertently, with increasing frequency."[38] In addition to creating the National Register of Historic Places, the act provided specific requirements for how all federal agencies, including the NPS, manage cultural resources under their care. The NHPA is a procedural law in that it requires a process of evaluating the impact of federal activities on cultural resources, but does not specify the preservation of those resources. The NHPA is not necessarily an ambiguous law, but beyond creating a system it does not direct how the NPS, or other federal agencies, implement the results of the NHPA process.

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[37] Dilsaver, 111.
[38] National Historic Preservation Act of 1966, 16 U.S.C. § 470 (1966).

Section 106 of the NHPA requires federal agencies to "take into account the effect of the undertaking on any district, site, building, structure, or object, that is included in or eligible for inclusion in the National Register."[39] For NPS cultural resource management, this requires a review process of the impact of any agency action on cultural resources. However, the mandate for a review process is not an obligation for preservation, only a requirement that negative impacts to cultural resources are considered.

Section 110 of the NHPA provides additional guidance for how federal agencies should manage cultural resources. Section 110 elaborates on Section 106 by stating that the head of each federal agency is responsible for the "preservation of historic properties which are owned or controlled by such agency."[40] Section 110 also requires that each agency create a preservation program to "protect and preserve historic properties."[41] For the NPS, Section 110 requires that the historic resources under its care are managed and maintained in a way that considers their preservation.[42] This does not allow the NPS to distinguish between historic resources based on location. If a historic resource is listed in or is eligible for inclusion in the National Register, the NPS is required to manage that resource for its preservation. The NHPA does not provide different instructions for the management of cultural resources within natural or wilderness areas. Again, the ambiguity of national legislation leaves the details of cultural resource management policy to the interpretation of the NPS, often at the park level.

While the previous legislation discussed in this section focuses on cultural resources, the Wilderness Act of 1964 concentrates on the administration of natural areas for the protection of what it defines as "wilderness characteristics." The Wilderness Act's purpose is to "secure for the

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[39] National Historic Preservation Act of 1966, 16 U.S.C. § 470 (1966).
[40] National Historic Preservation Act of 1966, 16 U.S.C. § 470 (1966).
[41] National Historic Preservation Act of 1966, 16 U.S.C. § 470 (1966).
[42] National Historic Preservation Act of 1966, 16 U.S.C. § 470 (1966).

American people of present and future generation the benefits of an enduring resource of

wilderness" and "provide for the protection of the areas, the preservation of their wilderness

character, and for the gathering and dissemination of information regarding their use and

enjoyment as wilderness."[43] The Wilderness Act defines wilderness as an "area where the earth

and its community of life are untrammeled by man, where man himself is a visitor who does not

remain."[44]

One important aspect of the Wilderness Act is its requirement that federal agencies

administering wilderness areas must manage those areas to preserve the wilderness character as

the land's sole function.[45] This creates a management conflict, perhaps even a legal paradox, for

the NPS as it tries to manage areas with overlapping cultural and wilderness resources and values.

With additional restrictions on the permitted actions in wilderness, such as road and vehicle

limitations, the physical requirements of cultural resource management are challenging within

wilderness. Furthermore, the Wilderness Act requires that wilderness areas be described to the

public as areas with a wilderness identity.[46] This creates the idea that the story of wilderness areas

should be one of wilderness, and not one incorporating the area's human history.

However, the Wilderness Act does actually allow for aspects of historic value to be

included within wilderness areas and also states that "wilderness areas shall be devoted to the

public purposes of recreation, scenic, scientific, educational, conservation, and historical use."[47]

What is meant by historical use is not elaborated, which implies that what constitutes historical

use can be further defined by NPS policy. The Wilderness Act affords protection of natural

resources with wilderness characteristics, which surely deserve to be protected. However, what

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43 Wilderness Act of 1964, 16 U.S.C. § 1131-1136 (1964).
44 Wilderness Act of 1964, 16 U.S.C. § 1131-1136 (1964).
45 Wilderness Act of 1964, 16 U.S.C. § 1131-1136 (1964).
46 Wilderness Act of 1964, 16 U.S.C. § 1131-1136 (1964).
47 Wilderness Act of 1964, 16 U.S.C. § 1131-1136 (1964).

role do historic and archeological resources located within wilderness have, and what should they contribute to the overall interpretation of those areas to the public? This answer is not provided by the Wilderness Act itself and highlights the importance of evaluating how the NPS crafts policy based on this legislation. This aspect of the Wilderness Act does open up the possibility of parks interpreting cultural resources as aspects of wilderness character. Although the Wilderness Act is a substantive law, in that it requires specific action, it remains ambiguous in how it is actually implemented at the park level. A following section will discuss how federal court decisions on the issue of wilderness management by federal agencies reduces this ambiguity, but also makes it more difficult for parks to manage cultural resources found in wilderness.

The Eastern Wilderness Areas Act of 1975 reiterated the Wilderness Act's intention for public land management agencies to submit additional land for congressional designation, including areas significantly modified by human activity.[48] Importantly, this legislation offered no distinction between wilderness areas with evidence of human activity and those without. The desire to provide wilderness protection for eastern federally owned land motivated passage of the Eastern Wilderness Areas Act.[49] This act made it clear that evidence of human modification should be no hindrance to wilderness designation. Furthermore, the act specifies that wilderness areas with evidence of human activity should be managed in the same way as those without evidence of human activity.[50] For the purpose of this thesis, the term 'Wilderness Act' will be used to encompass the requirements of both the Wilderness Act and the Eastern Wilderness Areas Act.

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[48] "Overview of Key Wilderness Laws." Wilderness.Net. Accessed April 18, 2014.
        http://www.wilderness.net/NWPS/legisoverview.
[49] "Overview of Key Wilderness Laws." Wilderness.Net.
[50] Eastern Wilderness Areas Act of 1975. P.L. 93-622, 88 Stat. 2096; 16 U.S.C. 1132.

While the Wilderness Act created an affirmative duty for the NPS, the National Environmental Policy Act of 1969 (NEPA) provided a procedural requirement to analyze the environmental impact of NPS projects and planning. The act's purpose is to "declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent of eliminate damage to the environment…"[51] The act goes on to specify the importance of understanding the environmental impact of federal action and details the process through which federal agencies must conduct project and policy planning to consider the environmental impact before taking action.[52] NEPA, like the NHPA, is a management planning process designed to ensure that the NPS, and other federal agencies, take the time to understand the impact of their actions on the environment.[53] NEPA also requires public input in the planning process, which provides transparency of the process and allows environmental interest groups a way to impact park project and policy planning. NEPA created the requirement that national parks engage in scientific natural resource management in a way it had previously not, and contributed to the adoption of science as a factor in park management.

Another aspect of national legislation is park enabling legislation. Park enabling legislation and presidential executive orders are responsible for actually creating national park units. Park enabling legislation gives the NPS under the Department of the Interior the authority to acquire and manage the new parkland. Park enabling legislation not only creates the park, but generally provides more specific guidance for park management and specifically articulates the reason why the park was created. This aspect of enabling legislation can be more restrictive than other national legislation and NPS-wide policy. Although enabling legislation is more direct than national

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[51] National Environmental Policy Act, 83 Stat. 852 (1969).
[52] National Environmental Policy Act, 83 Stat. 852 (1969).
[53] Miles, John C. *Wilderness in National Parks: Playground or Preserve* (Seattle: University of Washington Press, 2009), 237.

legislation, it remains open to interpretation by park managers. Examining enabling legislation and considering how park management's interpretation of that legislation have changed over time offers a way to better understand how park management can craft management policy to protect certain resources and project a certain understanding of park resources.

The legislation discussed in this section creates the basic framework for the NPS from which to develop policy regarding cultural, natural, and wilderness resource management. Collectively this legislation allow interpretation and is based on the idea that there are certain values that congress desires to be preserved, such as historic resources or wilderness. However, the lack of detailed direction even within park-enabling legislation, fails to address how overlapping cultural and natural resources should be managed, especially in areas designated as wilderness. This ambiguity allows the NPS, at both the national and park level, to apply broad legislation to park-specific resources. The impact of the individual park's ability to apply national legislation to park-specific resources will be considered in this thesis' examination of Congaree National Park. In the following section the NPS's interpretation of this legislation will be considered by examining the NPS's *Management Policies* and Director's Orders that relate to cultural and natural resource management and the administration of wilderness areas.

<u>NPS-Wide Policy</u>

The NPS's interpretation of legislation provides more detailed policy for cultural resource management than is offered by the legislation itself. Although NPS-wide policy articulates some aspects of cultural and natural resource management, examining NPS-wide policy demonstrates that much of the determination of resource management falls to the park level. The following NPS

management documents examine which management policies are dictated at the national level and what areas of policy and interpretation are the responsibilities of individual parks.

The *Administrative Policies for Historic Areas,* 1968, provides guidance for the NPS's management of historic resources, as well as limited guidance for the relationship between cultural and natural resources. In particular, this document emphasizes the importance of historic preservation by the NPS as a fundamental aspect of both use and public benefit.[54] The document created the List of Classified Structures (LCS) for the recording of "all historic structures in an area… that may be worthy and practicable of preservation."[55] The LCS acts as a partial fulfillment of the NHPA's requirement that government agencies record all historic and archeological resources under the government control. The *Administrative Policies for Historic Areas* also provides general information for the treatment of historic resources based on the categories of preservation, restoration, and reconstruction. The *Administrative Policies for Historic Areas* also includes management of ruins, but prohibits the intentional creation of ruins.[56] This aspect of the policy is significant because it creates a responsibility for the NPS to stabilize ruins, but also requires maintenance of structures so that ruins are not created through neglect.

However, the section of this policy describing historic resources implies that some historic resources do not qualify for preservation if they are located in natural areas or in areas of unrelated history. The policy states: "some historic structures, occasionally, are included within the National Park System incidental to the establishment of an area for another purpose, e.g., nature preservation or commemoration of a significant event with which a building may not be directly associated."[57] The policy then reads: "when sound structures of intrinsic artistic merit in

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[54] Dilsaver, 343.
[55] Dilsaver, 346.
[56] Dilsaver, 349.
[57] Dilsaver, 344.

themselves or that are valuable in illustrating the history of the Nation, a State, or locality are included [incidental to the establishment of an area for another purpose], their retention and use is encouraged."[58] This policy creates a management decision to be made at the park level by allowing parks to determine which historic elements in natural areas merit preservation, and which are beyond repair.

This policy seems to put some historic resources in natural areas at a disadvantage, particularly those historic resources, which may be related to minority groups that may have less attention. The policy also provides management direction for handling natural resources in relation to historic sites. Of historic sites the policy states:

> Natural accretions of time, such as forest growth, also may be retained unless it hampers visitor understanding of the event commemorated. To the extent necessary for visitor understanding, elements of the historic scene may be restored, including restoration of manmade features, vegetative growth, and historic land uses.[59]

Similarly, the policy allows agricultural uses of land in historic areas to complete an area's historic narrative.[60] The policy also states: "woods, forests, and individual trees contributing to the historical integrity of a historical area should be managed intensively to maintain the historic scene.[61]

The policies discussed above give credence to the influence of site-specific history on the cultural resource management in both historic and natural areas. This document provides a mixed directive on the relationship between natural and cultural resources. It both restricts historic resources in natural areas by permitting deteriorated or unrelated historic resources to be ignored, and allows management of natural resources to maintain the integrity of historic sites. Importantly, much of these questions become park level management decisions. These decisions are subjective,

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[58] Dilsaver, 344.
[59] Dilsaver, 351.
[60] Dilsaver, 351.
[61] Dilsaver, 351.

but the *Administrative Policies for Historic Areas* allows parks to shape the history and story of the park they share with the public. This aspect of the policy can either advance or diminish the preservation of historic resources depending on their perceived value and relevance by those in management positions.

The *Administrative Policies for Natural Areas*, 1968, lays out the overarching natural resource management requirements for national parks. This policy emphasizes the preservation of natural areas in an unimpaired state for continued natural use.[62] As a reaction to encroaching development around national parks the policy states: "Passive protection is not enough. Active management of the natural environment, plus a sensitive application of discipline in park planning, use, and development, are requirements for today."[63] Throughout the document there is an emphasis on active ecological restoration of indigenous natural environments and the preservation of scenic landscapes.

Regarding the management of cultural resources in natural areas this policy offers some direction. Agricultural uses are allowed if they are relevant to the interpretation of historic resources.[64] In terms of broader cultural resource management, the policy states that "worthy" historical resources, as determined by park management, should be preserved and shared with the public "to the extent compatible with the primary purpose of the area." Furthermore, "the management and use of [those] cultural resources [should] be patterned after the management and use of similar resources in historical areas."[65] Although the policy does not clearly state the criteria for worthiness of historic resources, it implies that this is a park level decision.

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[62] Dilsaver, 354.
[63] Dilsaver, 354.
[64] Dilsaver, 356.
[65] Dilsaver, 356.

This policy allows for the preservation of cultural resources in natural areas, however, only if those resources are deemed "worthy" and are related to the overall purpose of the park in which they are found. Again this highlights the impact of site-specific history in shaping cultural resource management policy. However, this policy does not present a uniformed approach to evaluation of significance and the treatment of historic resources within natural areas. This policy also offers no direction for the management of wilderness areas in general, including the preferred approach to cultural resources in wilderness areas.

Although issued in the same year, the policies directed to historic areas and natural areas do not provide an integrated approach to resource management. Each document emphasized a focused approach to their respective resource types, rather than a holistic approach uniting the needs of cultural and natural resources. The division of the administrative policies into cultural and natural resource versions further demonstrates this division. These policies demonstrate the separation between NPS-wide cultural and natural resource management guidance, but, importantly, these policies also influenced park-level decision-making, which in turn also reflected that separation between cultural and natural resource management policy. The 1968 administrative policies continued to influence park management until later NPS-wide management policies and Director's Orders offered additional guidance.

The *2006 Management Policies* provide the most recent comprehensive set of management directives for the National Park Service. This policy provides direction for resource management as well as descriptions of park management structure and the decision-making process. This section focuses on the information related to wilderness stewardship and natural and cultural resource management. Information about NPS organizational structure will be discussed in the following section that examines planning and decision-making at the park level.

The purpose of the *Management Polices* is to "encourage consistency across the [National Park] System" and provide a set of mandatory policies to help achieve "one National Park System."[66] The *Management Policies* provide specific guidance for both natural and cultural resources, as well as other aspects of NPS management. However, many of these policies are broad and leave specific application of NPS cultural and natural resource management policy to the determination of the parks.

The sections related to the management of natural resources and wilderness areas stress the importance of preservation over use, when there is a conflict between the two.[67] The document also reiterates the importance of ecological restoration to return disturbed areas to their original natural condition.[68] This policy directive presumably impacts cultural resources, including landscapes, structures, and land uses, however no guidance is provided for managing cultural resources in an area where ecological restoration is deemed desirable.

The *Management Policies'* discussion of wilderness area management reiterates much of the information offered by the Wilderness Act itself. The document does restate several aspects of wilderness management that impact cultural resources. The policy states, "all NPS lands will be evaluated for their eligibility for inclusion within the national wilderness preservation system."[69] Additionally, lands initially considered ineligible for wilderness designation can be reevaluated at a later time if the incompatible use is removed.[70] The *Management Policies* state that historic resources can be included in a wilderness area, but also makes it clear that the wilderness story will be the dominant narrative for that area.[71] The policy states that historic resources can be

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[66] *Management Policies 2006*. Department of the Interior: National Park Service. Washington, D.C.: U.S. Government Printing Office, 2006., 2.
[67] *Management Policies 2006*, 11.
[68] *Management Policies 2006*, 39.
[69] *Management Policies 2006*, 77.
[70] *Management Policies 2006*, 78.
[71] *Management Policies 2006*, 78.

included if "the structure would be only a minor feature of the total wilderness proposal; and the structure will remain in its historic state, without development."[72] This policy neither encourages, nor discourages the integration of human history as part of the wilderness narrative. Although the emphasis here is on historic structures, the policy also impacts the story and history of a place by affecting how the public interacts with and relates to historic resources.

The *Management Policies* contain references to adhering to the NHPA in the management of wilderness, but offers little else in the way of guidance for CRM in wilderness. The policy reads, "cultural resources that have been included within wilderness will be protected and maintained according to the pertinent laws and policies governing cultural resources using management methods that are consistent with the preservation of wilderness character and values."[73] By only holding parks to the legal requirements for CRM and not providing guidance for integrating human history into a park's story of wilderness areas, the *2006 Management Policies* downplay the importance of cultural resources as part of the larger story of wilderness areas. Ultimately, this impacts how the public relates to and understands wilderness areas as places with a human past.

The *Management Policies'* guidance for cultural resources focuses on the importance of researching and understanding cultural resources before any action is taken that may impact those resources. In this way the NPS follows the requirements of the NHPA. However, the policy also states that: "the Park Service will provide for the long-term preservation of, public access to, and appreciation of the features, materials, and qualities contributing to the significance of cultural resources."[74] This mandate for cultural resource management creates a potential conflict for cultural resources found in wilderness areas where natural resources are given preference in

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[72] *Management Policies 2006,* 78.
[73] *Management Policies 2006,* 83.
[74] *Management Policies 2006,* 67.

management decisions. The document does provide support for preservation of cultural

landscapes, but does not suggest that cultural landscapes have a role in wilderness areas.[75]

The *2006 Management Policies'* discussion of ethnographic resources provides one aspect

of NPS cultural resource management policy that considers cultural resources' place in natural

areas. The document describes ethnographic resources as "cultural and natural features of a park

that are of traditional significance to traditionally significant peoples."[76] The Management Policies

note that while these places may have historic value to certain people, they do not have to be

related to the reason the park was established or be of particular interest beyond that specific

group.[77] The policy states that: "the Service must… be respectful of… ethnographic resources and

carefully consider the effect that NPS actions may have on them."[78] However, the Management

Policies do not discuss how ethnographic resources relate to the larger issue of interpreting

cultural resources found in wilderness areas.

Although the *2006 Management Policies* provide some guidance for resource

management, it also demonstrates the degree to which specific elements of policy must be

determined at the park level. However, it is important to note that as the broadest NPS-wide policy

guidance, the *2006 Management Policies* minimize the role of cultural resources as part of

wilderness. This plays out at the park level through a continuing focus on wilderness as solely

natural areas. Similar to the 1968 Administrative Policies, the primary function of the *2006*

Management Policies is to create the framework within which park administrators can develop

procedures that are applicable for their resources. The *Management Policies* are not

comprehensive; further NPS policy is described by NPS Director's Orders. Examining relevant

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[75] *Management Policies 2006,* 69.
[76] *Management Policies 2006,* 70.
[77] *Management Policies 2006,* 70.
[78] *Management Policies 2006,* 70.

Director's Orders provides additional insight into the management framework of park level management.

National Park Service Director's Orders provide more detailed information than is offered by the NPS *Management Policies*. The Director's Orders delegate authority and offer new or revised policy and procedures for superintendents and other managerial staff.[79] As their name suggest, Director's Orders are issued by the NPS director following a review process and are based on the authority to "regulate the use" of the National Parks given to the NPS by the Organic Act.[80] Director's Orders include both mandatory and advisory information. However, unless they are citing existing laws, even mandatory aspects of these policies do not constitute legal requirements. Instead, Director's Orders serve as precedents for best management practices for the area of policy they cover. The following Director's Orders relate to the planning process, as well as cultural resources and wilderness management policy. These policies will be evaluated for how they shape park-level CRM and the degree to which they suggest site-specific environmental history has a role in shaping park CRM policy.

Director's Order (D.O.) 2: Park System Planning provides guidance for the essential planning framework for national park units. D.O. 2 describes a planning process for parks that begins at a very broad level with the General Management Plan and then works down to more specific plans. The broadest element of park planning is the park foundation statement. The foundation statement should be based on park enabling legislation and portrays "the park purpose, significance, fundamental resources and values, and primary interpretive themes."[81] The foundation statement is also intended to remain constant from one general management plan to the

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[79] "Things to Know… about National Park Service policy and the Directives System." National Park Service. Accessed December 20, 1013. http://www.nps.gov/policy/DOrders/thingstoknow.htm.
[80] "Things to Know… about National Park Service policy and the Directives System."
[81] "Director's Order 2: Park System Planning." National Park Service. Accessed December 20, 2013., 1.

next, but can be interpreted differently or rewritten by a park superintendent as part of a re-

visioning of park policies.

The next level of planning is the General Management Plan, which should be based on the

principles and characteristics defined in the foundation statement. The GMP is a "broad umbrella

document that sets the long-term goals" and defines natural and cultural resource management

goals, necessary conditions for visitors to understand and interact with park resources, appropriate

management activities, and standards for maintaining resource conditions.[82] The GMP should be

the product of an interdisciplinary approach that utilizes scientific and scholarly information and

considers input from the public and other stakeholder groups. A GMP should be a document that

provides a common management direction for all park divisions and creates an integrated

approach to resource management to avoid conflicting management interests, such as those

between cultural resources and wilderness.[83] Although most aspects of the GMP create a broad

approach to management, GMPs can specify "management zones delineating areas corresponding

to a particular resource or visitor experience."[84] This aspect of the GMP is the only part that

directly relates to the management of specific resources.

While the GMP provides broad guidance, other planning documents provide the specific

direction to achieve the goals articulated in the GMP. Program Management Plans, such as

Resource Stewardship Plans or Comprehensive Interpretation Plans, act as bridges between the

GMP and specific project planning.[85] These plans should achieve this connection by specifying

strategies "to achieve and maintain desired resource conditions and visitor experiences."[86] These

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[82] "Director's Order 2: Park System Planning.", 2.
[83] "Director's Order 2: Park System Planning.", 4.
[84] "Director's Order 2: Park System Planning.", 4.
[85] "Director's Order 2: Park System Planning.", 8.
[86] "Director's Order 2: Park System Planning.", 3.

plans may reference specific resources, but, in general, they provide strategy, rather than planning for particular resources.

Strategic Plans and Implementation Plans provide direction for the treatment of specific resources and projects. Strategic Plans provide one- to five-year plans that define goals for near-future resource conditions and visitor experiences.[87] D.O. 2 states that, "these goals are based on the park's foundation statement; an assessment of the park's natural and cultural resources; park visitor experiences; and the park's performance capacity given available personnel, funding, and external features."[88] Implementation Plans then take the next step to bring management goals to action. These plans provide specific details needed to carry out plans enumerated in long-term plans.[89] D.O. 2 states, "Implementation Plans deal with complex, technical, and sometimes controversial issues that often require a level of detail and thorough analysis beyond that appropriate for other planning documents." Implementation Plans generally concentrate on individual projects and specific components of the GMP. They can be designed for finite projects with a defined beginning and end, or a continuous activity, such as the management of a historic structure.[90]

D.O. 2 describes the management planning process for individual national park units. The direction included in D.O. 2 describes a process that looks at the broad approach in the form of the GMP, and then relates more specific plans back to the goals covered in the GMP. This allows a degree of flexibility, and allows parks to determine which resources are protected, how those resources are protected, and how the park interprets of those resources. The study of Congaree

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[87] "Director's Order 2: Park System Planning.", 3.
[88] "Director's Order 2: Park System Planning.", 3.
[89] "Director's Order 2: Park System Planning.", 3.
[90] "Director's Order 2: Park System Planning.", 9.

National Park will consider how these management plans have changed over time and how they have shaped how Congaree relates to resource management.

The NPS provides direction for park level implementation of NEPA in Director's Order 12. D.O. 12 reiterates the fact that NEPA is a procedural law and not a substantive law, such as the Wilderness Act. D.O. 12 also instructs parks that the information and analysis yielded in the NEPA process should be applied in management decisions related to how parks administer resources.[91] D.O. 12 applies to both project and policy planning to ensure that both elements consider environmental impact. For broader planning efforts, such as General Management Plans, NEPA analysis can be "conceptual," but for projects NEPA analysis must be "site-specific."[92]

D.O. 12 provides little insight into the relationship between cultural, natural, and wilderness management, but does demonstrate the degree to which NPS must incorporate environmental research and analysis into management action. D.O. 12 details a lengthy review process that places scientific environmental analysis within the management process of national parks.[93] The NEPA review described in D.O. 12 also applies to cultural resource management projects and policy. This ensures that the environmental impacts of cultural resource management are considered. However, this consideration does not necessarily contribute to cohesive management in situations where cultural, natural, and wilderness resources interact.

Director's Order 28, Cultural Resource Management (CRM) is the primary NPS-wide document establishing cultural resource management framework. In addition to laying out cultural resource policy, D.O. 28 also clearly articulates the NPS's ethos regarding to cultural resource preservation. D.O. 28 states: "once gone [cultural resources] cannot be recovered… park

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[91] "Director's Order 12: Handbook on Environmental Impact Analysis." National Park Service. Accessed April 8, 2014, 4.
[92] "Director's Order 12: Handbook on Environmental Impact Analysis.", 10.
[93] "Director's Order 12: Handbook on Environmental Impact Analysis.", 10.

management activities must reflect awareness of the irreplaceable nature of these material

resources."[94] D.O. 28 also draws a connection between the history found within park boundaries

with a wider cultural context when it states that "parks are part of larger cultural environments."[95]

Additionally, D.O. 28 makes it clear that even in wilderness-focused parks, cultural resource

management remains an essential responsibility of the park. The document reads:

> The NPS is responsible for… the protection of cultural resources… whether or not
> they relate to the specific authorizing legislation or interpretive programs of the parks in
> which they lie. Even where natural or recreational resources are the primary reason for a
> park's establishment, cultural resources must be identified, evaluated, and understood in
> their cultural contexts, and managed in the light of their values.[96]

This strong conviction to the value of cultural resources, as well as to the responsibility to protect

them, is an aspect of D.O. 28 that should be incorporated into management at the park level,

including wilderness areas.

The primary goal of D.O. 28 is to minimize negative impacts to cultural resources, and it

lays out several specific challenges to successfully completing that mission. These challenges

include, "a legally mandated review process, staff trained in diverse academic disciplines, limited

funds and a shortage of trained personnel."[97] Separately, D.O. 28 notes that the primary threats to

cultural resources "come from their surroundings."[98] This refers to a range of threats, from theft to

rodents, but the order also acknowledges that the fundamental solution to these threats is good

management practices. D.O. 28's answer to these challenges is a comprehensive planning process

that shapes the decision-making and stewardship process.

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[94] "NPS-28: Cultural Resource Management Guideline." National Park Service. Accessed December 20, 2013.
    http://www.cr.nps.gov/history/online_books/nps28/28contents.htm., 1.
[95] "NPS-28: Cultural Resource Management Guideline," 2.
[96] "NPS-28: Cultural Resource Management Guideline," 1.
[97] "NPS-28: Cultural Resource Management Guideline," 6.
[98] "NPS-28: Cultural Resource Management Guideline," 11.

D.O. 28 cites the *2006 Management Policies* as the document creating the duty for parks to develop and implement CRM policy. This requires parks to develop and periodically update a cultural resource component of the parks' broader resource management plan that describes cultural resources and articulates how those resources are to be preserved and shared for the public enjoyment.[99] D.O. 28 provides guidance on how to complete this planning. The comprehensive planning process includes building an understanding of the resources, slowing the deterioration of those resources, and then "[supporting] the use and enjoyment of cultural resources while minimizing negative effects on them."[100]

The first step in the planning process is to complete baseline research reports, such as cultural resource base maps and Historic Resource Studies, to create a broader understanding of the scope of resources before more specific studies are completed.[101] Once an understanding of a park's cultural resources is established, the planning process then focuses on preservation planning, integrating cultural resources with park-wide planning, identifying the most appropriate use for cultural resources, and determining the ultimate treatment of those resources.[102] D.O. 28 states that CRM planning should take into account Section 106 and 110 of the NHPA and National Environmental Policy Act (NEPA) review. In addition, CRM planning should be done in consultation with Advisory Council of Historic Preservation (ACHP), State Historic Preservation Office (SHPO), Tribal Historic Preservation Office (THPO), and any other federal, state, local government with an interest. Finally, the public should also be given an opportunity to comment.[103]

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[99] "NPS-28: Cultural Resource Management Guideline," 28.
[100] "NPS-28: Cultural Resource Management Guideline," 9.
[101] "NPS-28: Cultural Resource Management Guideline," 20.
[102] "NPS-28: Cultural Resource Management Guideline," 25.
[103] "NPS-28: Cultural Resource Management Guideline," 26.

Throughout the document, D.O. 28 highlights the importance of integrating CRM into park-wide planning and directly discusses the relationship between cultural and natural resource management. D.O. 28 states that, "cultural resource management must be integrated with natural resource management, education, and visitor experiences as the primary concerns of park management."[104] It also states that, "An integrated approach… views human beings as part of the natural world and the natural world as the basis for human activity."[105] This commitment to integrate cultural and natural resources represents a nuanced view of the relationship between culture and nature and that relationship's impact on how the public interacts with the park. This same commitment is not reflected in wilderness management documents. D.O. 28 also represents a progression from earlier cultural resource management documents, such as the Administrative Policies for Historic Area 1968, which did not explicitly value an integrated approach to cultural and natural resource management.

D.O. 28 directs parks to make this connection between cultural resources and other park management responsibilities through the completion of a Resource Management Plan (RMP) to be revised and updated every two to four years. The RMP incorporates all aspects of park planning and is initially shaped by a park's General Management Plan and Statement for Management.[106] In turn, future RMPs are influenced by new research and studies. For CRM the RMP "describes a specific plan of action, which is used to prioritize requests and to guide the expenditure of that portion of park base funds devoted to cultural resource management."[107] D.O. 28 also reiterates the importance of balancing the relationship between cultural and natural resources in its

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[104] "NPS-28: Cultural Resource Management Guideline," 12.
[105] "NPS-28: Cultural Resource Management Guideline," 12.
[106] "NPS-28: Cultural Resource Management Guideline," 28.
[107] "NPS-28: Cultural Resource Management Guideline," 29.

description of the RMPs purpose. D.O. 28 reads, "one of the objectives of the RMP is to foster integration of natural and cultural resource management actions in the park."[108]

D.O. 28 expresses the importance of park planning for cultural resource management. It also states that CRM planning is the task of individual parks. Although NPS regional offices and support offices can provide expertise, D.O. 28 states "the park is ultimately responsible for its own [CRM] program."[109] D.O. 28 goes on to specify that each park should have at least one person responsible for developing CRM planning and ensuring that that plan is implemented. This aspect of D.O. 28 is important to the idea of site-specific history's impact on CRM because it gives each park the responsibility of shaping policy based on a cycle of research and then updating planning documents to reflect that research. It seems that the needs of specific cultural resources should be reflected in park planning. As needs may change it is the park's responsibility to adapt to meet those needs. In the recommendations section of this thesis the idea of adaptive management will be discussed as the next step in this process.

D.O. 28 also provides guidance for how park administration should approach the stewardship for cultural resources. The stewardship guidance focuses on resource protection, funding and legal compliance, as well as how cultural resources should be integrated into the overall park story. D.O. 28 states, "resource protection is the paramount charge to park managers and the focus of park operations."[110] Resource management is the task of park managers and ultimately the responsibility of the park superintendent. Furthermore, D.O. 28 states that an important part of resource protection is sharing the value of those resources with park staff and visitors. D.O. 28 reads, "By communicating why resources have been set aside and should be

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108 "NPS-28: Cultural Resource Management Guideline," 29.
109 "NPS-28: Cultural Resource Management Guideline," 24.
110 "NPS-28: Cultural Resource Management Guideline," 33.

preserved along with the 'park story,' interpreters can enlist more stewards in their protection."[111]

Although this presents an opportunity for D.O. 28 to specifically direct parks to integrate cultural

resources into wilderness narratives, D.O. 28 does not provide that guidance.

D.O. 28 offers some guidance on the issue of funding for CRM and emphasizes the

importance of funding for an effective CRM program. D.O. 28 reads, "without proper funding, an

effective cultural resource management program cannot be carried out."[112] RMPs provide the

primary sources of information to support CRM budget needs.[113] The RMP should layout what

needs exist for CRM and direct park staff as they prioritize what funds will be dedicated to

cultural resources. D.O. 28 also describes the primary sources of funding for CRM; these include

park base funding, as well as several more specific funding sources linked to specific programs.[114]

Further, D.O. 28 covers the NHPA Section 106 and 110 responsibilities of park

management. In large part, this portion of D.O. 28 reiterates the information provided by the

NHPA itself. However, it does speak to the importance of developing preservation priorities and

developing long-range preservation plans.[115] D.O. 28 also makes it clear that the park

Superintendent is ultimately responsible for adherence to the NHPA and that park management

decisions should be related to Section 106 and 110 compliance.

D.O. 28 serves the role of the primary NPS-wide guidance for park-level cultural resource

management. D.O. 28 provides more specific direction for CRM, but also makes it clear that the

duty for determining specific CRM policy rests with individual parks. This suggests that specific

resources located within park boundaries should guide that park's CRM policy. D.O. 28 also states

that CRM policy is an essential aspect of management in every park, even those parks that were

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[111] "NPS-28: Cultural Resource Management Guideline," 34.
[112] "NPS-28: Cultural Resource Management Guideline," 34.
[113] "NPS-28: Cultural Resource Management Guideline," 42.
[114] "NPS-28: Cultural Resource Management Guideline," 42.
[115] "NPS-28: Cultural Resource Management Guideline," 44.

created for the protection of natural resources. D.O. 28 makes it clear that cultural resources

should be integrated into the larger park story and that history should be shared with the public.

Additionally, D.O. 28 states that cultural and natural resource management should be integrated

into a single management approach. D.O. 28 demonstrates a view of the relationship between

cultural resources and wilderness as a balanced one. It is important for this thesis to evaluate other

NPS-wide policy documents to understand they also reflect this approach to park-level CRM and

the relationship between cultural and wilderness.

D.O. 41, Wilderness Stewardship directs the management of wilderness areas. D.O. 41

covers the Wilderness Act in detail and specifically relates to the issue of wilderness character for

park management policy. In particular, the document encourages parks with wilderness to develop

a "wilderness character narrative which describes what is unique and special about a specific

wilderness."[116] D.O. 41 also states that wilderness character should be considered in all other

aspects of park operations. Each park with wilderness is directed to create a Wilderness

Stewardship Plan to guide management actions to preserve wilderness character. Part of this plan

is the creation of "minimum requirements analysis (MRA)… to document the determination of

whether a proposed action (project), which involves a prohibited use, is necessary to meet

minimum requirements for the administration of an area for the purpose of wilderness."[117] MRA

applies to all actions within wilderness areas, including those affecting cultural resources. This

creates a requirement that any action taken within wilderness is first weighed against its impact of

wilderness character prior to being taken.

D.O. 41 provides direct, although limited, instruction for the management of cultural

resources found within wilderness areas. D.O. 41 focuses primarily on the legal requirements of

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[116] "Director's Order 41: Wilderness Stewardship." National Park Service. Accessed December 20, 2013.
    http://www.nps.gov/policy/DOrders/DO-41(Corr).pdf., 8.
[117] "Director's Order 41: Wilderness Stewardship," 9.

the NPS to care for cultural resources. The document reads, "it is important to recognize that all laws intended to preserve cultural heritage are applicable in wilderness and must be applied in concert with the Wilderness Act."[118] The wording of this section in no way concedes any right to put the legal requirement to preserve cultural resources above the legal requirement to preserve wilderness. D.O. 41 goes on to state, "NPS managers must maintain an affirmative cultural resource management program in wilderness, but these sites must additionally be treated in a manner that preserves other wilderness resources and character. Measures to protect and inventory cultural resources in wilderness must comply with the Wilderness Act's provisions for minimum requirements analysis."[119] Although D.O. 41 states that cultural resource management can take place in wilderness, it does not direct parks to view human history in wilderness areas as part of the wilderness narrative.

D.O. 41 also considers the role of wilderness in park interpretation and education planning. D.O. 41 states, "wilderness character, resources, and stewardship should be included in the park's interpretation, education, and outreach programing and should be included as an integral component of the park's long-range interpretive planning and annual implementation plan."[120] D.O. 41 provides limits for the naming of geographic features within wilderness. To perpetuate the "untrammeled" characteristic of wilderness, geographic features within wilderness will not be named "unless an overriding need exists."[121] The policy does allow for exceptions, including when a geographic feature is "linked to an historical figure, activity, incident, or resource having direct association with the geographic feature."[122] However, this requires a variance in general application of the policy and does not specify that aspects of wilderness can be named in relation

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118 "Director's Order 41: Wilderness Stewardship," 13.
119 "Director's Order 41: Wilderness Stewardship," 13.
120 "Director's Order 41: Wilderness Stewardship," 14.
121 "Director's Order 41: Wilderness Stewardship," 14.
122 "Director's Order 41: Wilderness Stewardship," 14.

to historical land uses or structures located within wilderness. This limitation on naming places is also a limitation of sharing the human history of a place with the visitors who interacts with the land in those areas and building an understanding among visitors of the idea of a relationship between culture and nature.

Although D.O. 41 discusses the importance of meeting the legal requirements of CRM in wilderness areas, it also makes clear that cultural resources should be secondary to the wilderness character of those areas. D.O. 41 also does not suggest cultural resources are part of that wilderness character. It is interesting to compare D.O. 28 with D.O. 41. Whereas D.O. 28 discusses the importance of the relationship between cultural and natural resources in conveying a park's full story, D.O. 41 gives no such credence to the value of cultural resources in communicating the story of wilderness areas. Whereas D.O. 28 provides flexibility in how a park crafts its CRM policy, D.O. 41 describes a wilderness policy that is more structured from the national level. However, since each park is responsible for developing its own Wilderness Stewardship Plan the possibility does remain for allowances to be made for cultural resource management policy. In the recommendations section of this thesis, two parks that have recently integrated cultural resources and the history of human use into wilderness management will be discussed.

The legislation and policy guiding the NPS's management of cultural resources provides a duty to protect those resources and communicate the history of those resources to the public. However, these documents offer little specific direction about how to accomplish those two most basic goals. Instead, much of the detail of how an individual park meets the legal and policy requirement of cultural resource management is left to the determination of the administration of

an individual park. The legislation and policy also suggests that parks should craft their policy with respect to the particular cultural resources within each park.

Parks have numerous management responsibilities, including to the stewardship of natural resources. The policies examined above do not explicitly instruct parks on how to balance their various duties. The relationship between cultural resources and wilderness management creates the potential for a conflict in which resources receive different treatment and the park story does not reflect both natural and cultural aspects of park resources.

<u>Impact of Judicial Decisions on CRM in Wilderness</u>

While the Wilderness Act provides vague guidance for cultural resource management in wilderness areas, judicial review of federal management activities in wilderness demonstrates additional limitations on NPS management actions in those areas. In his 2009 article, "Wilderness and the Judiciary," Peter Appel considers how and why federal courts rule on cases involving federal management of wilderness areas. Appel addresses several cases to establish how federal courts tend to rule on cases involving federal management of wilderness areas. Appel addresses several cases to demonstrate the courts' approach to wilderness. In *Parker v. United States* the court ruled in 1970 that the U.S. Forest Service was required to maintain the "status quo" of potential wilderness areas until such time as Congress decided whether or not to designate those areas as wilderness.[123] In 2003, the court ruled in *Wilderness Society v. U.S. Fish and Wildlife Service* that commercial activities and enterprises were not permitted in wilderness areas.[124] In 2004, the court ruled in *Wilderness Society v. Mainella* visitors could not accompany

[123] Appel, Peter. "Wilderness and the Judiciary." Accessed April 8, 2014.
    (http://works.bepress.com/peter_appel/1), 42.
[124] Appel, 47.

administrative trips into wilderness to access historic sites.[125] These cases are important for their

impact on specific management situations, but Appel also argues that they are significant because

they represent a larger trend in how the courts rule on cases concerning federal agencies'

administration of wilderness.

Each case discussed by Appel ultimately restricted federal agency activity in wilderness

areas and directed federal agencies to apply a strict interpretation of the Wilderness Act. Appel

notes that, in these cases and others, court decisions ruled in favor of "traditional notions of

wilderness protection" and applied "rigorous scrutiny" to agency actions perceived as harmful to

traditional wilderness values.[126] Additionally, Appel states that "the statutory definition of

wilderness has remained essentially untouched" since the Wilderness Act's passage.[127] These legal

observations are important because they demonstrate that while wider society's understanding of

wilderness evolved since the 1960s, the legal understanding of wilderness has remained the same.

Appel supports his argument by citing case statistics. These statistics reveal that in cases

involving wilderness management, the courts rule in favor of maximum wilderness protection the

majority of the time.[128] Appel's research illustrates the additional restrictions on NPS management

attempts to carry out CRM programs in wilderness. The decisions of the courts provide a narrow

interpretation of the Wilderness Act, which affords NPS managers with limited opportunities to

develop and implement creative cultural resource management solutions.

In Laura Kirn's 2013 thesis, "A Case for Storied Landscapes: Wilderness and Historic

Preservation," she suggests the NPS develop specific guidance for park management of cultural

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[125] Appel, 43.
[126] Appel, 36.
[127] Appel, 9.
[128] Appel, 58.

resources found in wilderness.[129] Kirn argues that the NPS should develop and implement policy

that offers "sound, thoughtful, and defensible guidance" for parks that manage wilderness.[130] With

agency-wide policy for managing cultural resources in wilderness, the NPS would be able to craft

CRM policy that met a strict application of the Wilderness Act. As opposed to the current park-by-

park effort to develop new policy and management approaches. This is essential for the NPS to

find a methodology for managing cultural resources within wilderness that can survive the strict

application of the Wilderness Act by the courts. The successful and consistent management of

cultural resources within wilderness will not be possible until a solution is available that meets the

strict application of the Wilderness Act by the courts.

Relationship Between CRM, Nature, and Wilderness

While it is important to consider the policy, legislation, and judicial decisions affecting the

management of cultural and natural resources, it is also necessary to understand how cultural and

natural resource management developed into separate management approaches and explore what

factors shaped and continue to shape the relationship between cultural, natural, and wilderness

resources. In particular, it is important to consider how wilderness ideals and the Wilderness Act

itself affect the balance between culture and nature in the National Parks. Congaree National Park

is not the only park that must manage both wilderness and cultural resources. Point Reyes

National Seashore and Apostles Island National Lakeshore are two parks that have received

attention for their imbalanced relationship between cultural and wilderness interests. Ultimately,

the question of the relationship between cultural resources and wilderness management is about

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[129] Kirn, Laura Ann. "A Case for Storied Landscapes: Wilderness and Historic Preservation." (Goucher College, 2013), 154.
[130] Kirn, 154.

the story parks choose to tell about themselves. This choice shapes how the public understands and values park resources.

A key factor in the separation of cultural resource and wilderness management was the development of a stronger scientific ethic in the NPS. In his essay, "Toward a History of Environmental History in the National Parks," Mark Fiege considers how science, in particular ecological science, developed as a management tool in the National Park Service. According to Fiege, the genesis of science in the NPS was natural history.[131] Natural history provided a wide range of studies, from geology to wildlife, and acted as a more holistic approach to natural studies. Over time, however, academic disciplines moved away from the broad umbrella of natural history to focus on more specific disciplines.[132] However, the adoption of science as a management tool by the NPS required more than just an increasing diversity of scientific focuses.

Richard West Sellars discusses the growth of science as a management tool in *Preserving Nature in the National Parks*. Sellars points to George Wright as the first NPS manager to support the comprehensive use of science to support management decisions.[133] Wright's work was cut short by his untimely death in 1936, and science took a backseat in the NPS until the 1960s when external pressure from the environmental movement pushed the NPS to consider science.

In what Sellars refers to as the "Leopold Era," national legislation and reports, including the Leopold Report, pushed the NPS to adopt science as a management tool.[134] The Leopold Report, issued in 1963, provided a critical evaluation of the NPS's natural resource management policy by experts not associated with the NPS.[135] The report gained national attention and created pressure for the NPS to adopt ecological science as a fundamental management duty. The report

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[131] Fiege, 8.
[132] Fiege, 8.
[133] Sellars, 91.
[134] Sellars, 204.
[135] Sellars, 214.

also called for progressive natural resource management to restore ecological communities. Furthermore, the report evoked a "New World" imagery of the parks, stating that the land should appear as it did at first European contact.[136] The Leopold Report offered no support of park management or interpretation that viewed the landscape as a blend of natural and human influence. The Leopold Report was closely followed by the National Academy of Sciences Report, which included many of the same ideas.

The 1963 Leopold Report and National Academy Report were followed by "efforts to infuse science into park management."[137] In particular, this effort intended to bring scientists to an equal footing within the agency's leadership structure. There was little enthusiasm for this change within the NPS because of an entrenched bureaucracy focused on tourism development, but external pressure from the environmental movement and national legislation pushed science to the forefront of natural resource management and then wilderness stewardship. The Wilderness Act, Endangered Species Act, Federal Air Pollution Act, Water Pollution Control Act, and National Environmental Policy Act (NEPA) each provided a new legal requirement to incorporate science into management decisions. In particular, NEPA created a management duty for the NPS by requiring the "use of natural and social science in plans and decisions."[138] This growth in science as a management tool did not necessarily diminish cultural resource management, but it did challenge the status quo of the NPS as an agency driven to manage the parks for public use.

U.S. Secretary of the Interior, Steward Udall, adopted the Leopold Report as policy in May 1963.[139] The Leopold Report stated that "naturalness should prevail" in park management and was an attempt to bring more cohesiveness to natural resource management policy in the NPS. Sellars

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[136] Sellars, 214.
[137] Sellars, 217.
[138] Sellars, 234.
[139] Sellars, 244.

also states that although the Leopold Report and national legislation brought more science into management, they did not end the NPS's history of manipulating natural resources. This began the period of wildlife and ecosystem restoration that continues today.[140] Sellars concludes his book by stating that the NPS must "attune its own land management and organizational attitudes to ecological principles" to be leaders in natural environment preservation.[141] Sellars' seminal work played a role in increasing science's role in NPS management. *Preserving Nature in the National Parks* led to an $80 million increase in base funding for natural resource management and science research through the Natural Resource Challenge.[142]

So how then is the NPS, with a fully-grown emphasis on scientific management still falling short in environmental management? Fiege argues the NPS adoption of science in management decisions could be improved by synthesizing scientific and historic information about the land. Fiege advocates environmental history as a tool to incorporate a historic understanding of land use with scientific data to make better place-based management decisions. Fiege and Sellars both make a case that science has improved NPS natural resource and wilderness management, but each also argues that the NPS needs to incorporate scientific data with a better understanding of place. Environmental history can help park managers to understand and communicate both how human history affected the environment of parks, as well as how a park's natural elements shaped human history.

As science grew as a factor in NPS management decisions, the NPS was also undergoing a transition from an agency focused on park development to an agency focused on resource stewardship. The history of the parks as designed places dates to the beginning of the National

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[140] Sellars, 243.
[141] Sellars, 290.
[142] McDonnell, Janet A. "Reassessing the National Park Service and the National Park System." The George Wright Forum, Vol. 25, No. 2 (2008): 6-14., 10.

Park Service. The interpretation of the Organic Act's Statement of Purpose led the NPS to develop parks that met visitor needs. This development also included shaping the natural landscape to be more appealing for visitors. The 1918 Lane Letter encouraged park development to be harmonious with the landscape.[143]

During the 1950s and 1960s, NPS Director Conrad Wirth continued the precedents set by the early NPS. Wirth's Mission 66 was very much a continuation of the earlier design ethic that encouraged shaping the park to support visitor use. Mission 66, carried out from 1956 and 1966 to prepare the NPS for the Organic Act's 50th anniversary, was a major development push for the NPS and concentrated on designing new visitor facilities and increasing accessibility to park resources.[144]

Mission 66 reshaped the way visitors experienced the national parks, energized wilderness advocates in resistance, and affected development of NPS management. The central premise of Mission 66 reflected the sentiment of the 1918 Lane Letter that public enjoyment and accessibility required park development. Mission 66 emphasized development, and, in turn, awoke the pre-World War II debate between recreational use and wilderness management as the purpose of natural areas in national parks. Conrad Wirth's plan for the national park system provided a point of attack for wilderness supporters who saw the new development and increasing visitor accessibility as a threat to their idea of wilderness.

Historian Ethan Carr employs NPS director Newton Drury's phrase, "dilemma of our parks," to describe the issue of visitor use versus resource protection, in his discussion of the

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[143] Carr, Ethan. "NPS Design Tradition in the 21st Century." The George Wright Forum, Vol. 30, No. 1 (2013): 5-11., 7.
[144] Carr, Ethan., 6.

conflict between the ideals of Mission 66 and wilderness advocates.[145] Carr argues that Mission 66 reignited this debate, but did nothing to resolve how the NPS should balance development and wilderness interests. This in part guided wilderness supporters to legislative protection for wilderness areas, rather than policy measures. During the 1950s wilderness advocates defined "wilderness specifically as an absence of humanity and its influences."[146] For NPS director Conrad Wirth, Mission 66 did enough to protect natural areas because it concentrated development in the front-country at visitor centers, and, with the exception of roads, left natural backcountry areas untouched.[147] However, for wilderness advocates this was not enough. Wilderness areas needed affirmative protection and any effort to improve accessibility to wilderness areas represented a threat. For wilderness advocates at that time, visitor use and wilderness protection were not compatible management actions.[148]

This continuation of the "dilemma of our parks" played out as the wilderness movement pushed for wilderness protection legislation in the 1950s and 1960s, and later as the NPS began implementing the Wilderness Act. Mission 66 was not the sole cause, but it was the period in which park lands transitioned "from picturesque scene to scientific wilderness."[149] While Mission 66 provided no direct guidance for balancing visitor use with wilderness stewardship, it left a lasting policy and management legacy, which influenced how the NPS managed and interpreted park resources. Mission 66 strengthened central NPS leadership and led to standardized education and interpretive programs.[150] Education and interpretation were important aspects of Mission 66's emphasis on visitor accessibility and experience. This focus on visitor use continued as a priority

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[145] Carr, Ethan. *Mission 66: Modernism and the National Park Dilemma*. (Amherst: University of Massachusetts Press, 2007), 233.
[146] Carr, 266,
[147] Carr, 221.
[148] Carr, 275.
[149] Carr, 221.
[150] Carr,184.

for the NPS beyond Mission 66 and positioned resource management, for cultural, natural, and wilderness resources, as secondary priorities.

By the 1970s, pushed by public support, as well as direction from Congress, the NPS began moving away from development and toward resource stewardship as its primary responsibility. This related to the growing emphasis of science in management decisions, but at a fundamental level was also a reinterpretation of the Organic Act's Statement of Purpose. The desire to leave parks "unimpaired" took on a greater weight than the mandate to provide the parks for the public use and enjoyment. This change was reflected in GMPs that no longer focused on development, but provided general resource stewardship guidance. The evolution in the way the NPS thought about its own responsibility reflected a broader shift in the way society thought about and valued natural resources. This is significant because it demonstrates that the NPS is responsive to the continuing evolution of the national park idea. Furthermore, this illustrates the value in continuing to evaluate and challenge how the NPS approaches resources management to find better methods of managing cultural, natural, and wilderness resources.

The Wilderness Ideal

The idea of wilderness as a place without human influences and set aside from future development emerged during the nineteenth century. However, early in the history of the national parks movement there was little distinction between what was considered a "national park" and what was "wilderness."[151] The remoteness of the early parks and their unique natural characteristics required park development to provide accessibility and amenities for park visitors. The conservation movement grew in response to fears that development in and around parks

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[151] Miles, John C. *Wilderness in National Parks: Playground or Preserve* (Seattle: University of Washington Press, 2009), 1.

would lead to a loss of the natural resources that defined park character and value. The idea of setting aside land, specifically as wilderness to protect it from development emerged following the Second World War, although there were some earlier efforts.[152]

While the conservation movement existed prior to WWII, it emerged stronger during the post war years. In part this was a reaction to increased visitation and a growing concern that development and over use would diminish the natural qualities of the parks. The conservation movement, led by The Wilderness Society, began pushing for national wilderness legislation to legally define wilderness areas and mandate the treatment of that land for conservation, rather than tourism development.[153]

The wilderness movement was partially a lack of confidence in the National Park Service's ability to protect wilderness through its own administrative policies. The wilderness movement, led by Howard Zahniser of The Wilderness Society, advocated for the zoning of park natural resources, mainly between the "front country" and wilderness backcountry.[154] The National Park Service resisted wilderness legislation primarily because it feared a loss of administrative authority over park management and development in some portions of the parks. While NPS Director Conrad Wirth pushed forward the development plans of Mission 66, he also argued that there were essentially "zones of civilization" within the parks that needed to be connected by roads through that wilderness. Additionally, Wirth believed in compatibility between wilderness and development, in that land considered wilderness needed to be accessible and usable for visitors.[155]

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[152] Miles, 123.
[153] Miles, 123.
[154] Miles, 139.
[155] Sellars, 192.

Wirth argued that parkland was already sufficiently protected under the Organic Act; any additional legislation would only complicate NPS's ongoing conservation efforts.[156]

Despite the NPS's resistance, the Wilderness Act passed Congress in 1964 on a surge of environmentalism in the United States. The Wilderness Act created a new legislative mandate for land management in the parks and went beyond the direction of the Organic Act and park enabling legislation to offer a stricter idea of "unimpaired" with respect to wilderness areas.[157] The Wilderness Act immediately impacted management in the National Parks as it required the NPS to "develop and practice wilderness management more openly and positively than [before]."[158] Each park was required to review parklands for wilderness characteristics for inclusion in the National Wilderness Preservation System.[159] The Wilderness Act also required parks to manage potential wilderness as if it was wilderness. The Wilderness Act required National Parks to adopt a new, more restrictive approach to land management and visitor regulations.[160]

The NPS's approach to implementing the Wilderness Act evolved over time. Through each version of NPS-wide management policies the exact approach to managing wilderness changed.[161] The wilderness conservation movement has criticized the NPS for its implementation of the Wilderness Act. Historian Sellars articulates several points of weakness in the NPS's implementation of the Wilderness Act. Sellars suggests that the NPS has been slow and ineffective in developing and implementing Wilderness Management Plans with only a handful of parks completing actual Wilderness Management Plans.[162] This is a criticism that can be applied to Congaree National Park as well. Another critic of the NPS's wilderness management is Bob

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[156] Sellars, 191.
[157] Sellars194.
[158] Miles, 270.
[159] Miles, 172.
[160] Miles, 172.
[161] Miles, 272.
[162] Miles, 278.

Krumenaker, former President of the George Wright Society. Krumenaker argues that although the NPS has met the basic legal mandate for wilderness management, the real need is to integrate wilderness and natural resource management more "fully into park operations."[163]

Critics of the NPS's wilderness and natural resource management policy see a constant conflict between the agency's management of the parks for visitor use and resource protection. Specifically, the concentration of funding on "front country" resources, rather than backcountry areas, strikes wilderness advocates as an imbalance in NPS management priorities.[164] With 86% of parklands managed as wilderness or potential wilderness in 2004, wilderness management is an unavoidable aspect of park operations.[165] In large part, this issue reflects the feeling of early conservation advocates that the NPS was not doing enough to take care of wilderness resources. It also highlights the NPS's struggle to prioritize which resources maintained when there are insufficient funds to care for all resources.

The concerns of wilderness and natural resource advocates focus on the conflict between natural resource stewardship and park visitation; however, the wilderness movement paid little attention to the balance between natural and cultural resource prioritization. Furthermore, the concern with the protection of wilderness focuses on furthering the wilderness story. In the next section, the relationship between wilderness and cultural resources is discussed as part of the larger park story.

The wilderness debate is an old issue in American society. To distill the opinions and ideas of what constitutes wilderness to a single statement may be impossible. New ideas are always developing, and old ideas are always being rediscovered. In addition to the resources used in this thesis, many other resources are available and contribute to a fuller understanding of the breadth of

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[163] Miles, 279.
[164] Miles, 281.
[165] Miles, 280.

the wilderness debate. *The Great New Wilderness Debate* edited by J. Baird Callicott and Michael Nelson provides a collection of essays and documents related to the questions of what is wilderness and what is wilderness's value. Callicott and Nelson compile a collection of works that express a range of wilderness ideas and communicates the evolution of thought in American society on the issue of wilderness. *The Great New Wilderness Debate* succeeds in establishing the roots of the wilderness idea in the nineteenth and early twentieth century with writers such as Henry David Thoreau, John Muir, and Aldo Leopold. The book then moves on to demonstrate how the wilderness idea spread and changed over time. *The Great New Wilderness Debate* demonstrates well that wilderness is an old idea, but is also an idea that is always changing.

The question of how to manage wilderness, too, consists of a wide range of writings and ideas. A recent collection of essays on the topic, *Beyond Naturalness: Rethinking Park and Wilderness Stewardship in an Era of Rapid Change*, attempts to capture a variety of ideas as it considers approaches to managing and protecting natural values. Editors David Cole and Laurie Yung compile works that consider how natural resource management has changed and what can be done to protect nature and wilderness from contemporary challenges. The works included in this collection focus on the threats to nature conservation and provide nature and wilderness managers with conceptual and practical approaches for resource protection.

There are many other works, such as Michael Pollan's *Second Nature: A Gardener's Education* and numerous essays available online at the George Wright Forum, that offer other views, approaches, beliefs, and ideas related to the wilderness idea. This thesis does not, nor could it, cover the entirety of work on the idea of wilderness and the value of nature. However, it is important that this thesis communicates the wide range of resources available and notes that this

material is always evolving as the idea of what wilderness is, and what the role of wilderness in society should be, continues to change.

<u>Wilderness Ideal's Impact on NPS Cultural Resource Management</u>

The idea of wilderness as a place untouched by human activity is misleading. What is misleading is not that the nature in these places should be protected, but that the story of how the current form of these places called wilderness came to exist may not be expressed to the public. The idea of wilderness as purely natural advances a feeling that those places are separate from humanity. From a human history perspective this is harmful because it omits the role of cultural resources in those areas. However, it is also harmful to wilderness itself because it denies the millenniums-old role of humanity in shaping nature as well as nature's role in shaping human history.

William Cronon wrote in his essay on this topic, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature," that, "the trouble with wilderness is that it quietly expresses and reproduces the very values its devotees seek to reject."[166] Cronon's argument is that wilderness only serves to separate humanity and nature, while what is needed to protect nature, is to bring humanity and nature closer together. The concept of wilderness itself, Cronon suggests, is a purely human creation that produces the first instance in which those areas have actually been uninhabited.[167] Cronon's observations on the imbalanced relationship between wilderness and history values natural protection very highly; however, Cronon sees value in the "wildness" of

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[166] Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature." Environmental History, Vol. 1, No. 1 (January, 1996): 7-28., 16.

[167] Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature." Environmental History, Vol. 1, No. 1 (January, 1996): 7-28., 7.

nature, and in the understanding of the depth and impact of human history on the natural world.[168]

Cronon's problem is not with nature, but with how wilderness supporters describe certain portions

of nature.[169]

The NPS develops a particular story for wilderness areas that focuses on the wilderness

characteristics of those places, rather than an account that also tells the human history of

designated wilderness. Wilderness designated areas have no legislative responsibility to "protect

access to man-made structures," but it remains legally possible to communicate the human history

of a wilderness area.[170] In fact, the Wilderness Act includes history as a possible wilderness

characteristic. The importance of telling the story of cultural sites found within wilderness, even if

those resources are inaccessible, is necessary for understanding a place. Throughout his work,

Cronon reiterates that it is not simply a structure that is historic and valuable, it is the experience

and the story of people and how they used the land that is essential to understanding both a place's

history and nature.[171]

For areas where wilderness and cultural resources overlap, understanding the history of

that place provides the public with a deeper understanding of a natural place's value, and their

relationship with that place. By integrating both history and nature into the wilderness story, a

more complete understanding of those resources can be communicated to the public. As Cronon

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[168] Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature." Environmental History, Vol. 1, No. 1 (January, 1996): 7-28., 16.

[169] Cronon, William, ed. *Uncommon Ground: Rethinking the Human Place in Nature* (New York: W.W. Norton & Company, 1996), 25.

[170] Gathers, Kerry. Old Buildings and the New Wilderness: The Politics of Conservation in Cumberland Island, Georgia. (University of Georgia, 2011), 30.

[171] Cronon, William, ed. *Uncommon Ground: Rethinking the Human Place in Nature* (New York: W.W. Norton & Company, 1996), 70.

describes, these place-based histories or "acts of remembering" provide an important connection to both our cultural identities and our place in nature.[172]

The question remains of how to best integrate cultural and natural understandings into NPS policy. Historian Mark Fiege states that in ecological history one of the primary principles is the idea that nature is undergoing processes of constant change.[173] In history too, there is the underlying idea of continuous changes and an understanding that human history is shaped by natural forces. The challenge then is to understand why the two narratives fail to integrate and what factors in NPS policy contribute to that failure.

Existing research helps to illustrate the impact of NPS resource management policy and the Wilderness Act at the park level. This research concentrates on the ways wilderness and natural resource management determine not only how cultural resources are maintained, but also how that policy shapes the public's understanding of cultural resources and the park landscapes as a whole. Two NPS units in particular will be discussed, Point Reyes National Seashore (PORE) and Apostle Islands National Lakeshore (APIS), for the NPS's interpretation of wilderness and natural resource management policy in relation to cultural resources. Although these parks are geographically distant from Congaree National Park, it is the same national system that guides their management policy. Considering how PORE and APIS express national legislation and NPS-wide policy provides a valid comparison for Congaree, which is guided by the same policy and legislation.

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[172] Cronon, William, "Why the Past Matters." The Wisconsin Magazine of History, Vol. 84, No. 1 (Autumn, 2000): 2-13, 4.
[173] Fiege, 6.

Established in 1970, Apostle Islands National Lakeshore (APIS) is located at Wisconsin's northern tip and includes twenty-one of the twenty-two Apostle Islands.[174] In 2004, 80% of APIS was designated as the Gaylord Nelson Wilderness.[175] APIS's path to management by the NPS as a wilderness began during the 1930s. Historian James Feldman writes that the NPS first evaluated the Apostle Islands as a possible National Park in the 1930s, but the area had been heavily logged and bore the marks of heavy human use. Feldman quotes a NPS report that stated, "the ecological conditions have been so violently disturbed that probably never could they be more than remotely reproduced."[176]

Figure 1: Historic road now used as nature trail, Apostle Islands National Seashore[177]

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[174] Feldman, James W. "The Need for Legible Landscapes: Environmental History and NPS Management at Apostle Islands National Lakeshore," The Georgia Wright Forum, Vol. 28, No. 2 (2011): 148-160, 148.
[175] Feldman, 148.
[176] Feldman, 148.
[177] Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature.", 4.

However, Feldman points out, the natural conditions that led to wilderness designation in 2004, were not the result of only natural processes, rather they were the result of decades of management decisions on the part of the NPS.[178] Feldman, as well as historian William Cronon, describe the impact of managing wilderness to minimize the appearance of human history on the visitor experience. Cronon notes that, "wilderness is returning to such a degree that hikers can walk old logging roads and completely fail to realize the woods through which they are traveling were stumps just a half century ago."[179] [Figure 1] In the same way, Feldman describes how the old timber and fishing camps being used by hikers fail to acknowledge the land's historical use in those areas.[180]

The process of removing the human past from the landscape began with APIS's first management plan that directed the majority of the park to be managed as wilderness. The management processes that led to wilderness designation began with segregating the park into "management zones."[181] The zones divided the park into "primitive" areas where no development was permitted, "natural environment" where trails and limited interpretation were allowed, and "historical and cultural" areas, which were separate on paper from the other zones. Feldman suggests that this zoning, even prior to wilderness designation, divided the park's narrative into "legible" management areas.[182]

Reinforcing the impact of management zones was the designation of 97% of APIS as potential wilderness in 1977.[183] This directed APIS to manage the vast majority of the park to preserve wilderness characteristics, including undertaking ecological restoration projects. In

[178] Feldman, 149.
[179] Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature." Environmental History, Vol. 1, No. 1 (January, 1996): 7-28, 8.
[180] Feldman, 149.
[181] Feldman, 150.
[182] Feldman, 151.
[183] Feldman, 152.

relation to APIS, historian William Cronon, writes that the Wilderness Act created a "stark and artificial boundary between nature and culture."[184] Feldman expands on this idea by describing how the *1975 NPS Management Policies* directed parks to actively remove aspects of historical land use from wilderness areas. The policy states, "Where such [historical] uses have impaired wilderness qualities, management will be directed toward restoration of wilderness character."[185] Later NPS *Management Policies* perpetuated this policy by directing management to remove "non-conforming conditions that preclude wilderness designation."[186] Feldman argues that this policy led the NPS to remove some cultural resources from wilderness without regard for their historic significance.

Figure 2: Old Michigan Island Lighthouse, Apostle Island National Seashore[187]

At APIS the NPS acquired approximately 200 structures, many of which were removed as non-conforming. This contributed to the APIS's goal of maintaining the park in a "near natural

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184 Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature." Environmental
   History, Vol. 1, No. 1 (January, 1996): 7-28, 5.
185 Feldman, 152.
186 Feldman, 152.
187 Apostle Island National Lakeshore. Accessed February 15, 2014.
   http://www.nps.gov/media/photo/gallery.htm?id=5722133E-155D-4519-3EA5161441B51B2E.

state."[188] Feldman argues that this policy "created what is in some ways an illusion – the appearance of untouched nature."[189] Although APIS has preserved its National Register historic structures [Figure 2], those structures are all found outside of wilderness, while those historic structures within wilderness, which did not meet National Register criteria, were removed.[190]

The broader implication of this NPS policy is that human history of wilderness areas is neglected and only a partial understanding of the landscape is possible for park visitors. Feldman writes, "the segregation of natural and cultural landscapes obscures the human stories buried in wilderness, making it harder to see the connections between nature and culture that created so many wild places."[191] Feldman and Cronon both argue that the common ground between wilderness and cultural resource management should be the story of the relationship between human and nature, essentially an environmental history understanding, that led the landscape to its current condition. Cronon writes,

> Management policy in the [Apostle Island] National Lakeshore should seek to protect wilderness values and historic structures, certainly, but it should equally protect stories – stories of wild-nature, stories of human history. It is a storied wilderness. And it is in fact these stories that visitors will most remember and retell, even as they contribute their own experiences to the ongoing history of people and wild nature in the Apostle Islands.[192]

Both Feldman and Cronon see the possibility, and the necessity, of uniting natural and cultural resource management for the purposes of telling a more complete park story. Feldman and Cronon advance the idea of portraying the wilderness as a "rewilding" landscape or a "storied wilderness" that allows a complex, multi-layered story to replace the separate zones of use presented by the

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[188] Feldman, 153.
[189] Feldman, 153.
[190] Feldman, 153.
[191] Feldman, 153.
[192] Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature." Environmental History, Vol. 1, No. 1 (January, 1996): 7-28, 12.

NPS.[193] These values are beginning to be adopted at APIS. The 2009 GMP incorporates the idea

of a "rewilding" landscape. The goal is to better integrate the management of cultural resources

and wilderness values and provide visitors with an understanding of the complicated relationship

between culture and nature that created the current landscape. Feldman writes that success will

come when "visitors… enter the wilderness armed with the ability to see its history, and emerge

from it more able to recognize the consequences of human habitation in nature."[194]

Like the Apostle Island National Lakeshore, Point Reyes National Seashore (PORE) has a

long history of human use in areas now designated as wilderness. PORE also shares a similar

history in the creation of that wilderness through management practices. Congress created PORE,

located north of San Francisco on Drake's Bay, in 1976 which was originally intended to be a

recreation-focused park with support for the continued pastoral use of the land.[195] However,

following the park's creation the NPS began managing park lands to restore natural qualities to the

landscape. Historian Laura Watt writes, "almost immediately after the Seashore's establishment,

NPS staff began eliminating traces of former human habitations, particularly from the "public use"

section of the Seashore."[196] Watt argues that this process to remove evidence of human history

was a result of efforts to remove non-conforming content from areas designated as potential

wilderness.

Watt describes how the NPS began the wilderness process by initially nominating 5,250

acres for wilderness designation. However, following strong public input the final wilderness

designation encompassed 25,480 acres.[197] However, these areas disregarded various historical uses

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[193] Cronon, William, "The Trouble with Wilderness: Or, Getting Back to the Wrong Nature." Environmental
        History, Vol. 1, No. 1 (January, 1996): 7-28, 9.
[194] Feldman, 155.
[195] Watt, Laura A., "The Trouble with Preservation, or, Getting Back to the Wrong Term for Wilderness
        Protection: A Case Study at Point Reyes National Seashore." APCG Yearbook, Vol. 64 (2002): 55-72, 56.
[196] Watt, 61.
[197] Watt, 63.

and structures, including World War II-era bunkers, ranch landscapes and structures, and oyster

harvesting.[198] Historian Timothy Babalys writes that during the nineteenth and twentieth century

Point Reyes was valued as a working landscape, while during the late twentieth centuries that

value shifted to recreational aspects. The wilderness designation, that was the projection of the

public's value of wilderness recreation, created a conflict between the land's historic use and the

land's new recreational and environmental use.[199]

Figure 3: Point Reyes Lighthouse, Point Reyes National Seashore[200]

Both Watt and Babalys argue that in the NPS's attempt to implement wilderness policy,

human history at PORE was intentionally diminished to support and develop wilderness

characteristics. Watt states that at PORE,

> Wilderness has been constructed from a historic ranching landscape, and in the
> process of managing and interpreting the area, the history of its human habitation and use

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[198] Watt, 62. And Babalys, 2.
[199] Babalys, 14.
[200] Library of Congress. Accessed February 15, 2014.
http://www.loc.gov/pictures/item/ca1357.photos.013083p/resource/.

has been downplayed or overlooked. This erasure of history is not an accident; it represents
a strategic reconfiguration of the landscape to bring it closer to public and [NPS]
expectation of what a wilderness "ought" to look like.[201]

Watt argues that the Wilderness Act is a "forward looking" management policy and goes on to

suggest that the Wilderness Act values the appearance of wilderness above whether or not a place

actually had historical human use. The act requires that lands be managed so that they become

wilderness by removing those aspects deemed non-conforming to reduce or eliminate the imprint

of human life on those landscapes.[202]

Although Watt sees the Wilderness Act itself as the foundation for the NPS's imbalanced

approach to cultural resources in natural areas at PORE, she also describes how the NPS's

management of PORE's wilderness further separates the idea of nature and culture. In particular,

Watt, as well as Babalys, criticizes the NPS's separation of cultural and natural elements at PORE.

Watt notes that the wilderness at PORE is not continuous and works around areas of human

development that could not be removed, such as ranch inholdings. While working around those

areas, the NPS has systematically removed evidence of human use and overlooked the human

stories. Watt writes, "In order to preserve the impression of wilderness, the NPS minimizes

availability of information about the actual human history."[203] In wilderness areas the NPS offers

no historic interpretation, and outside of wilderness, where it does offer historic interpretation, the

material focuses on Native American and pioneer history, rather than the 150 years of ranching

history preceding the establishment of the park.[204] Watt argues that by shaping the appearance of

wilderness areas and only interpreting a select history in select areas, the NPS is influencing the

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[201] Watt, 56.
[202] Watt, 56.
[203] Watt, 67.
[204] Watt, 67.

experience of visitors. This management approach allows visitors to have a wilderness experience, but does not give visitors an accurate understanding of the landscape's history.[205]

Watt and Babalys each turn to an integrated approach to cultural resource and wilderness management as the solution to the imbalanced presentation and interpretation of wilderness in PORE. Babalys, like Mark Fiege, argues that using environmental history as a management methodology provides an opportunity to integrate natural and cultural understandings of PORE.[206] This idea rests on achieving an accurate historical understanding of the area and communicating how human interactions shaped the current landscape. Watt argues that the appropriate way to treat the wilderness at PORE is to provide additional information to the public about how the wilderness there was created. Watt suggests that similar to the terminology used to describe the treatment of historic buildings, i.e. preservation, rehabilitation, restoration, and reconstructions, could also be used to describe different types of wilderness.[207] Both historians believe that the black and white nature of wilderness designation creates a restriction that incorrectly shapes the management of those areas, as well as the wilderness narrative of those places that is shared with the public.

At both Point Reyes National Seashore and Apostle Islands National Lakeshore the NPS implemented the Wilderness Act through policy at the park level that diminishes both the physical integrity of cultural resources, as well as the story of human activity in those places. Both parks demonstrate the ways in which the Wilderness Act and NPS-wide policy shape management procedure at the park level. However, each park also made park-level management decisions that affected how the public perceived the history of wilderness areas. The challenge for NPS

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[205] Watt, 68.
[206] Babalys, 12.
[207] Watt, 69.

managers at Point Reyes and Apostle Islands, as well as at Congaree and numerous other parks, is to find a common ground between cultural resource and wilderness management policy.

Coming Changes to the Dynamic Between CRM and NRM

The question of how to better balance cultural and natural resource management is one of the challenges the NPS is working toward solving as the NPS's centennial approaches in 2016. The NPS is moving toward a more flexible management structure that allows parks to make management decisions based on the specific resources under their care. This proposed process raises the question of how quality can be controlled across a national system, if individual parks are given more management discretion. The NPS centennial provides the park service with motivation to make changes and set the agency on the right path for the next century.

Recent scholarship and NPS management policy changes point toward an integrated management system that unites natural and cultural resources under the more general term "resources."[208] In Jillian Cowley's 2012 article, "Moving Toward Integrated Resource Planning," Cowley argues that by seeing cultural and natural resource management as a single objective, NPS managers can provide a more holistic management approach. Cowley's argument reflects the environmental history thoughts of Cronon, Fiege, and others in that integrated resource planning first seeks to understand the relationship between culture and nature, and then expresses a single narrative. Cowley writes that NPS's current method of categorizing resources falsely distinguishes between resources that "overlap and are integrated in the field."[209]

Cowley describes the NPS's new planning tool, Resource Stewardship Strategies (RSS), as the policy vehicle that joins the broad General Management Plan with more specific project

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[208] Cowley, Jillian. "Moving Toward Integrated Resource Planning." Proceedings of the 2011 George Wright Society Conference on Parks, Protected Areas, and Cultural Sites, (2011): 60-65, 60.
[209] Cowley, 60.

planning. Cowley uses Pecos National Historic Park (PECO) as a case study for the RSS process. At PECO the management team looked at using "resource contexts" and "landscapes," rather than grouping resources as either natural or cultural.[210] The use of landscapes provided a holistic management approach since landscapes are already essentially integrated features. PECO used coordinated geographic information systems [GIS] to bring together all of the previously segregated resources.[211]

Cowley's description of the RSS brings to light a new management tool available at the park level. RSS provides parks with another way to control and integrate the way their resources are measured and shapes a more cohesive park narrative that unites culture and nature. For Apostle Island and Point Reyes discussed previously, the RSS process could provide a methodology for better managing their cultural resources in the context of the natural resources that are now the focus of park management. Likewise, an integrated approach to cultural resource and wilderness management could provide Congaree National Park with more balanced approach to park resources.

The NPS has reflected many similar ideas about resource integration in its recent agency-wide planning goals in the document, *A Call to Action: Preparing for a Second Century of Stewardship and Engagement*. *A Call to Action* considers the NPS's role in the next century of managing many of the United States natural and cultural resources. The document focuses more on idealistic goals, rather than specific plans, but does express the importance of working toward better relating to the public and balancing park resources. One aspect of *A Call to Action* is its emphasis on management at the park level. *A Call to Action* states, "Program managers and superintendents will select actions that are best for the purpose of their program or park…

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[210] Cowley, 63.
[211] Cowley, 64.

flexibility and creativity are encouraged" and that "the [NPS's] plan identifies what to accomplish, but allows employees and partners to determine how to achieve the objectives."[212]

Although flexibility and creativity in park-level management is encouraged, *A Call to Action* reiterates that parks must prioritize funds by "focus[ing] investments from all maintenance fund sources on high priority national park assets to address critical deferred maintenance and code compliance needs."[213] Although this aspect represents a weakness that may lead to certain resources being favored over others, inadequate funding is an issue all parks must deal with and provides an opportunity for the flexible and creative management policy that *A Call to Action* emphasizes.

A Call to Action is clear in the value and emphasis it places on localizing management policy and decisions at the park level. This shift in NPS policy provides additional support for the potential of site-specific environmental history as a factor shaping park level management decisions. However, increasing the management authority of individual parks and moving toward integrated Resource Stewardship Strategies will not automatically correct the imbalance between cultural resource and wilderness management. It provides parks the opportunity to craft and share a more accurate park narrative and protect all resources equally, but individual parks will still have to make the 'right' decisions and choose how to allocate limited funds.

Summary of Key Issues

The material covered in the literature review provides a foundation for understanding the processes shaping management policy in the NPS and explains how those processes relate to cultural resources management at individual parks. Reviewing this material reveals several key

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[212] *A Call to Action: Preparing for a Second Century of Stewardship and Engagement*, National Park Service (2011), 7.
[213] *A Call to Action*, 18.

issues relating to the primary research questions of this thesis. The management structure of the National Park Service reflects a top-down approach. National legislation and NPS-wide policy guide the actions and decisions of park managers. However, examining these documents demonstrates that these national laws and policies are open to interpretation and varying implementation at the park level. Parks must work within the boundaries of these laws and policies, but they are ultimately responsible for crafting how resource protection is carried out and what park story is communicated to the public.

Although this is an opportunity for site-specific environmental history to guide management decisions, in parks with wilderness-designated areas, the cultural narrative may be overlooked or actively removed to make way for the wilderness story. Examining the Wilderness Act itself, as well as how wilderness designation impacted the management of cultural resources at Point Reyes and Apostle Islands, demonstrates the often-leading role of wilderness in defining park management policy. The criticism of cultural resource advocates often focuses on the idea that wilderness management directly impacts the physical condition of cultural resources in wilderness, in addition to diminishing the human story of those places.

The literature and policy discussed in the literature review demonstrate the management and policy framework, in addition to the relationship between cultural resources and wilderness management interests. The literature resources considered in this thesis also demonstrates how the social dialogue surrounding the issue of wilderness influenced how the NPS approach to resource management changed over time. Since its creation the NPS has reinterpreted its own function and purpose as it now seeks to emphasize resource management, where it once focused on park development for visitor use. This thesis will evaluate Congaree National Park in an effort to expand the understanding of these issues. It will consider what elements of Congaree National

Park's management policy are impacted by environmental history, as well as opportunities where site-specific environmental history could be employed to improve cultural resource management and the relationship between cultural, natural, and wilderness resource management. In addition, the examination of Congaree National Park will explore how the evolution in the NPS management approach is also evident at the park level.

CHAPTER 3

CONGAREE NATIONAL PARK

Congaree National Park, located approximately 25 miles southeast of Columbia, S.C., encompasses over 26,000 acres of old-growth bottomland hardwood forest, the largest such area remaining in the United States.[214] Congaree provides an interesting opportunity to study the relationship between cultural resources and wilderness in NPS management, as well as the impact site-specific environmental history may have on management.[215] As a park created for the purpose of preserving a unique natural environment, the protection, management, and interpretation of cultural resources was an afterthought of early management. The cultural resources protected within the park boundaries were collateral and were not valued highly enough to warrant national park status on their own. However, as a National Park, Congaree retained the responsibility of managing, protecting, and interpreting its cultural resources. Examining Congaree's approach to cultural resource management provides an opportunity to better understand how a wilderness-focused park balances its responsibility to both natural and cultural resources. Additionally, as a relatively small National Park, Congaree demonstrates the challenges in managing a range of resources with limited staff and financial resources.

This study of Congaree focuses on the park's planning documents. It takes a chronological approach to better understand the progression of policy and how interpretation and implementation

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[214] "Nature and Science." Congaree National Park. Accessed December 15, 2013.
http://www.nps.gov/cong/naturescience/index.htm
[215] In this section, Congaree will be used to mean Congaree National Park or Congaree Swamp National Monument, rather than Congaree as a geographic place. Additionally, the term wilderness is used to describe designated wilderness. The term natural resource management is used to describe management of natural areas, including areas of designated wilderness.

of that policy changed over time. Throughout this study these documents will be examined with specific reference to the primary and secondary research questions, including: how the park managed cultural resources, how the park balanced cultural and natural resource management, how site-specific environmental history may have guided management policy, and how management policy influenced the park story communicated to the public. These factors demonstrate how Congaree's relationship with its resources changed over time and shows the degree to which a National Park shapes its management policy to fit the resources under its care.
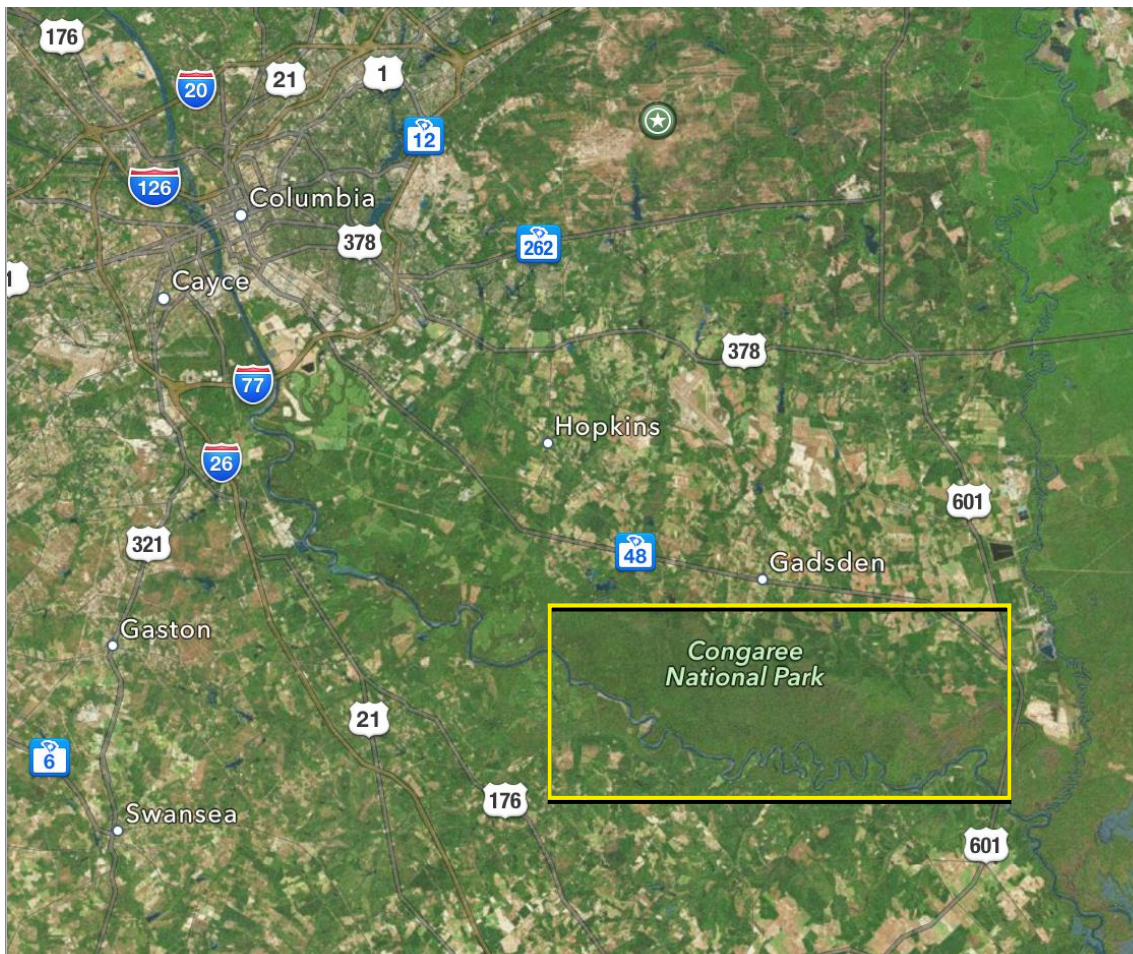

Figure 4: Geographic context map[216]

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[216] Map by author.

Park History and Enabling Legislation

Examining Congaree's human past demonstrates that the area, although now considered a wilderness, has a long relationship between the landscape and human activity. However, because most research at Congaree focused on natural resources, the park's history and archeology are not thoroughly documented. Most understanding of the park's history is based on Dr. J. L. Michie's 1980 archeological survey, which covered only 10% of park area, not including any of the park's later land acquisitions. Despite this, park planning documents tend to base cultural resource management decisions on that 1980 report.

The earliest period of human activity in Congaree is the prehistoric period, 10,000 B.C. to AD 1700.[217] Although limited evidence has been found from this period, the area likely was used for hunting and gathering resources such as "freshwater mussels, fish, deer, bear, turkey, and other animals and vegetal products such as nuts, berries, and edible plants."[218] Only limited evidence suggests permanent settlement, however this understanding seems to be based on an assumption that Native Americans would not have lived in a floodplain.[219] According to history cited in park planning documents, it is more likely that early Native Americans lived on the fringes of the floodplain and entered the area to hunt and gather.

During the late seventeenth century members of the Congaree Tribe, for which the river and the park are named, used the area. Near present-day Columbia, the Congaree had a village that served as a major trading center.[220] The Congaree traded timber, ship building materials, Native American slaves, furs, and other items with Europeans on the coast. The Congaree used what became the Congaree River as part of the trade network and likely used what are now parklands as

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[217] *Resource Management Plan.* Congaree National Park. National Park Service, December 1, 2004, 43
[218] *Resource Management Plan,* 2004, 43.
[219] *Resource Management Plan,* 2004, 43.
[220] *Resource Management Plan,* 2004, 44.

a source of trade material.[221] However, in 1698 and 1699 a small pox epidemic decimated Native populations in South Carolina, including the Congaree. As a result, the remaining Congaree joined with another tribe and lost their tribal identity.[222]

During the era of European settlement through the American Revolution, the Congaree floodplain was not extensively settled, but continued to serve as a source of resources, and the river continued to be a major transportation route. During this period the floodplain began supporting agriculture and cattle.[223] In the Civil War and Reconstruction Era the Congaree floodplain was not heavily used, although some historical accounts suggest park lands may have been used as a hiding spot for runaway slaves and criminals.[224]

In the 1880s, Francis Beidler, a Chicago lumberman, purchased the Congaree area with the intention of logging cypress in the floodplain. However, when that venture proved unprofitable, the land remained essentially untouched until 1969.[225] In 1969, the return of timber cutting in the forest stoked the Congaree conservation movement and ultimately led to the park's creation.

The history above describes the narrative of the Congaree floodplain as expressed in park planning documents. This is in part by necessity, as little documented history of the area exists, and also by choice to demonstrate the park's current perception of its own historical identity. Throughout Congaree's planning documents the history of use of parklands in the past as a source of resources has been downplayed in importance, while the fact that little evidence exists to support proof of permanent settlement has been treated as a fact that proves Congaree's wildness. However, what Congaree's history expresses is a long relationship between the landscape and human activity. This history also shows a human past that was profoundly shaped by the

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[221] *Resource Management Plan,* 2004, 44.
[222] *Resource Management Plan,* 2004, 44.
[223] *Resource Management Plan,* 2004, 44.
[224] *Resource Management Plan,* 2004, 45.
[225] *Resource Management Plan,* 2004, 45.

surrounding environment. While that use now consists of recreation and park management, it still remains a history of human use. The history of human interaction with parklands and the park's management attitude to that history stem from the movement that created the park and the resources and ideas that were valued by the park's initiators.

Figure 5: Local conservation leader Harry Hampton next to Bald cypress, Congaree National Park[226]

The first evaluation by the NPS of the Congaree floodplain for potential development as a park came in 1963 with the *Specific Area Report: Proposed Congaree Swamp National Monument*. Local woodsman Harry R. E. Hampton was the driving force behind bringing the NPS evaluation of the area and would later lead the movement to create Congaree Swamp National

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[226] Congaree National Park. Accessed February 15, 2014.
http://www.nps.gov/media/photo/gallery.htm?id=3816DB21-1DD8-B71C-075C73E1C4F8857B.

Monument.[227] The *Specific Area Report* evaluated primarily the area's natural resources, in large part because the history and archeology of the area was not well known at that time. Congaree had served as a biological research area since the 1950s, so the natural and scientific aspects of the park also were known at the time of the report.

The *Specific Area Report* focused on the pristine and unique natural features that made the area a good candidate for a park. The report stated, "Today the forest within the study area exists in a near virgin state. This magnificent forest of "specimen" trees is a rare remnant of what was once typical of southern river bottom lands."[228] The report specified the significant aspects of the park, those elements that make the area eligible for national park consideration. These included the unique river bottom biological community and floodplain, the remarkable size of tree species, and swamp ecology with relatively unspoiled fauna.[229] According to the report, these features put the Congaree area "clearly in the scientific category," rather than being a park defined by scenic vistas or historic resources.[230]

The *Specific Area Report* also considered the human context in which the Congaree floodplain exists, although it does not consider the human relationship with parklands as contributing to the significance of the site. The report stated,

> Principal fringe area developments are small farms, plantations, an occasional store and gas station, churches, and school houses. Some farm activity has become established along the banks of the Congaree River. However, the periodic flooding of the land limits the agricultural operations, but permits considerable ranging of cattle and hogs.[231]

The report also referred to hunting clubs in the area. Most consideration of human activity in and around the Congaree floodplain argued that human presence did not interfere with the area's

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[227] Rametta, Francis T. *Congaree Swamp National Monument: An Administrative History.* Department of the
        Interior, National Park Service, Congaree Swamp National Monument, March 1991, 12.
[228] *Specific Area Report: Proposed Congaree Swamp National Monument, South Carolina.* Department of the
        Interior, National Park Service, Southeast Region, April 1963, 1.
[229] *Specific Area Report 1963*, 16.
[230] *Specific Area Report 1963*, 6.
[231] *Specific Area Report 1963*, 14.

natural characteristics. The result of the *Specific Area Report* was a recommendation that the area

should be protected as a national monument.

Figure 6: Loblolly Pine seen from lower boardwalk, Congaree National Park[232]

The *Specific Area Report* was later used by the grassroots movement in the 1960s and

1970s to justify the creation of Congaree Swamp National Monument. However, the report

provided no specific reference to cultural resources within the Congaree floodplain, nor did it

specify the opportunity to incorporate local history into a potential park. The report rightfully

concentrated on the area's significant natural resources, but by completely overlooking cultural

resources the NPS report from the beginning diminished the opportunity to incorporate human

history into the park's narrative.

The park's administrative history, completed in 1991, described the movement to create

Congaree Swamp National Monument and offered an understanding of how the park's story and

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[232] Photo by author.

relationship with cultural resources developed during the period of the park's creation. The movement to create Congaree Swamp National Monument moved slowly during the mid-1960s following the *Specific Area Report*, but the movement grew during the late-1960s as the threat of logging returned. Although owners of the land had initially been favorable to the idea of a park they believed only 500 acres should be preserved, rather than the 22,000 acres suggested by the NPS.[233] In September 1968 the NPS Southeast Region published a report outlining the threats to the Congaree floodplain, including Biedler family's reluctance to sell and a planned Army Corps of Engineer's project to widen the channel along that portion of the Congaree River.[234] However, widespread public support for the protection of the area did not begin until 1970 when a group of naturalists discovered a clear cut area within the floodplain.[235] This discovery, along with the Biedler family-owned Sautee River Cypress Lumber Company's plan to continue timber harvests in the area, brought the support of national and state environmental groups.

Francis T. Rametta, author of Congaree's administrative history, writes that the growing belief that "the great Congaree bottomland forest was about to disappear in a piecemeal fashion… [caused] local conservationists [to become] more highly organized."[236] In 1973 the Sierra Club became more involved in leading of the national movement to save that area, and in 1974 local preservationist John V. Elder founded Congaree Swamp National Preserve Association to organize the local movement.[237] The culmination of the conservation movement was the "Congaree Action Now" campaign, which successfully leveraged local support to pressure South Carolina's governor and other state and national South Carolina politicians.[238]

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[233] Rametta, 9.
[234] Rametta, 19.
[235] Rametta, 23.
[236] Rametta, 23.
[237] Rametta, 25.
[238] Rametta, 34.

Opponents to the creation of the park argued that conservation goals could be met without restricting use of the landscape.[239] Opponents included the landowning Biedler family and various timber interests. A central aspect of their opposition was the idea that "Congaree Swamp had been under cultivation since over 150 years ago and, therefore, was not as pristine as preservationists were inclined to believe."[240] Opponents argued that the landowners had a history of protecting the land, and could do a better job than the NPS. Additionally, they argued that conservation goals could be met without restricting timber or hunting interests, although they did not specify how.[241] With the political pressure by the grassroots movement and increasing national awareness, the question of conservation moved into the political realm. In this new arena the debate remained one between conservation through use and preservation.[242] Grassroots political pressure led to a South Carolina legislature resolution encouraging the "Congress of the United States to expeditiously legislate the establishment of a… natural area in the Congaree Swamp as recommended in the Specific Area Report… in 1963."[243] By citing the *Specific Area Report* the resolution reaffirmed the purpose of protection to be the area's natural resources and continued to downplay the area's human history.

United States Representative Floyd Spence, representing the district in which Congaree is located, introduced House Resolution 11891, to establish Congaree Swamp National Preserve in February 1976. This bill authorized the Department of the Interior to acquire 15,000 acres from the Biedler family.[244] In May 1976, South Carolina Senators Strom Thurmond and Ernest Hollings introduced a similar bill in the Senate.[245] The two bills moved between the House and Senate

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239 Rametta, 30.
240 Rametta, 29.
241 Rametta, 30.
242 Rametta, 39.
243 Rametta, 44.
244 Rametta, 48.
245 Rametta, 50.

before the final version passed on September 29, 1976, and signed by President Gerald Ford on

October 18, 1976, as Public Law 94-545.[246] This act created Congaree Swamp National

Monument and provided the fundamental framework guiding the park's management and

narrative.

Congaree Swamp National Monument's enabling legislation, P.L. 94-545, is a relatively

short document, as is park enabling legislation in general, but it outlines the basic parameters of

land acquisition, management goals, and importantly defines the park's mission statement.

Congaree's enabling legislation states:

> That in order to preserve and protect for the education, inspiration, and enjoyment
> of present and future generations an outstanding example of near-virgin southern
> hardwood forest situated in the Congaree River floodplain in Richland County, South
> Carolina, there is hereby established the Congaree Swamp National Monument.[247]

This statement reaffirms the nature-centric purpose expressed in the *Specific Area Report* and by

the public movement that created the park. Although other federal legislation, such as the National

Historic Preservation Act (NHPA) and Archeological Resource Protection Act (ARPA), requires

certain aspects of cultural resource management, the enabling legislation positions the care of

cultural resources to be secondary to the stewardship of natural resources. This effectively

established resource management hierarchy which overtime directed Congaree's limited staff and

funding to natural resource and wilderness management.

In addition to setting the management tone for the park, the enabling legislation

appropriated funds for acquisition of the Biedler property and required completion of a wilderness

study in three years.[248] Additionally, the legislation required the park to identify additional lands

to acquire, determine the expected visitation, determine types of visitor use, and specify to

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[246] Rametta, 52.
[247] *Act to Establish Congaree Swamp National Monument,* Pub. L. 94-545, 90 Stat. 2517 (1976).
[248] *Act to Establish Congaree Swamp National Monument,* Pub. L. 94-545, 90 Stat. 2517 (1976).

location and types of needed facilities.[249] The enabling legislation directed park management to develop a General Management Plan (GMP) to guide park operations.

However, before the park issued its first GMP in December 1988, additional legislation impacted Congaree. In 1983, Public Law 98-141 increased appropriations to the park for land acquisition from $35,500,000 to $60,500,000.[250] In 1984, Public Law 98-506 designated the visitor center as the "Harry R.E. Hampton Visitor Center," and modified the original enabling legislation to allow the necessary utilities for the visitor center.[251] In October 1988, just prior to the park's first GMP, Public Law 100-524 expanded park boundaries and designated wilderness in the park.[252] The park expansion appropriated funds for an additional 7,000 acres bringing the total area of the park to 22,200 acres. The act also designated 15,010 acres of land previously managed as potential wilderness as wilderness. It also designated an additional 6,840 acres as potential wilderness to be managed as wilderness.[253]

An important aspect of the enabling legislation and the legislation that followed in the park's early years, was its ambiguity to the management of specific resources. This allowed park management to interpret the legislation and craft management policy within a broader framework. In the following sections Congaree's interpretation of that legislation and NPS-wide policy will be examined to better understand how the park shaped management policy to respond to the park's specific resources. This examination also demonstrates that changes in Congaree's policy reflected similar changes in the NPS as a whole. In particular this will consider how the park considered the

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[249] *Act to Establish Congaree Swamp National Monument,* Pub. L. 94-545, 90 Stat. 2517 (1976).
[250] Act to Amend Certain Provisions of Law pertaining to units of the National Park System, Pub. L. 98-141, 97 Stat. 909 (1983).
[251] An Act to Amend the Act Authorizing the Establishment of the Congaree Swamp National Monument..., Pub. L. 98-506, 98 Stat. 2338 (1984).
[252] *An Act to Expand the Boundaries of the Congaree Swamp National Monument, to Designate Wilderness therein, and for Other Purposes.* Pub. L. 100-524, 102 Stat. 2606 (1988).
[253] *An Act to Expand the Boundaries of the Congaree Swamp National Monument, to Designate Wilderness therein, and for Other Purposes.* Pub. L. 100-524, 102 Stat. 2606 (1988).

relationship between cultural and natural resources, as well as how Congaree crafted the narrative it shared with the public.

<center>Pre-General Management Plan Policies and Management</center>

Although Congaree's first General Management Plan was not completed until late 1988, the park was still operated under a set of management guidelines developed by park and NPS regional and national staff. However, the lack of a comprehensive management plan gave a sense of piecemeal management in which certain aspects of management responsibilities were more likely to be overlooked. The tone and focus of the management policies from the park's creation in 1976 to the GMP in 1988 remained consistent and for the most part the GMP continued to reflect the values expressed in those initial policies.

Without the guidance of a GMP, Statements for Management (SFM) and Resource Management Plans (RMP) directed park management. The 1978 SFM provided Congaree's first management guidelines. The 1978 SFM echoed the values expressed in the enabling legislation and 1963 *Specific Area Report*. It defined the purpose of the park was "[to] preserve and protect for education, inspiration, and enjoyment of the present and future generations an outstanding example of near virgin southern hardwood forest situated on the Congaree River floodplain."[254] The 1978 SFM also cited the Organic Act providing a broader management responsibility for the park by including cultural resources.

The 1978 SFM also described the park's significant resources, focusing on the uniquely intact mature forest ecosystem and exceptionally large trees of various species. In addition, the document referred to the lack of human interaction throughout the history of the Congaree forest

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[254] *Statement for Management.* Congaree Swamp National Monument. National Park Service, June 7, 1978, 1.

as a primary factor allowing the environment to mature to its current state.[255] The description of

the park's purpose and resources highlighted the park's management concentration on natural

resources. With the exception of citing the Organic Act, cultural resource management was

minimized as a management priority.

The document also described the current influences on park management. This included

the enabling legislation's requirement to identify additional lands to acquire, and the need to

complete baseline research and to plan for visitor use.[256] However, the continuation of a hunting

lease within park boundaries until 1982 was also described as a major challenge for park

management.[257] The 1978 SFM also specified that no traditional uses within park boundaries

would influence resource management.[258] In addition to discounting the traditional use of the area

for hunting, this statement also downplayed the impact of other traditional uses of the land such as

logging, cattle raising, and fishing on management. Although these uses conflicted with

compatible use of wilderness, the decision not to integrate those human activities into park

management ignored the context in which the park exists. Especially since those uses continued in

areas adjacent to the park.

With a major focus on natural resources, the 1978 SFM offered little direction for cultural

resource management within the park. The document called for baseline research of cultural

resources, but otherwise did not consider CRM as a management objective.[259] The lack of

information directing CRM was not unexpected or unreasonable considering the park was set

aside for public use because of unique natural features. The 1978 SFM calls for completing an

inventory of cultural resources. However, as later policy documents demonstrate, Congaree has

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[255] *Statement for Management 1978,* 2.
[256] *Statement for Management 1978,* 5.
[257] *Statement for Management 1978,* 11.
[258] *Statement for Management 1978,* 8.
[259] *Statement for Management 1978,* 9.

struggled to complete baseline cultural resource inventories, and, as such, the park lacks adequate

information to guide good management decisions about cultural resources.

Figure 7: Bald cypress from lower boardwalk, Congaree National Park[260]

The 1978 SFM, as was its purpose, did not provide management guidance for specific park

resources, but did set general policy and management goals that continued until the first GMP in

1988. The 1978 SFM built on the enabling legislation and public movement to create the park to

establish the basis for a park narrative and public outreach based entirely upon the area's natural

resources. This is represented by the 1978 SFM's list of Management Objectives, which focuses

on natural resource protection and developing the park for visitor use. [261] While cultural resource

management was an afterthought, the 1978 SFM also offered little guidance for wilderness

management in the park.

The Resource Management Plan and Environmental Assessment (RMP) completed in

August 1982 built on the 1978 Statement for Management by offering more resource specific

management guidance. The 1982 RMP expanded on the basic information included in the 1978 as

a result of research and inventory of park natural and cultural resources. Similarly to the 1978

SFM, the 1982 RMP provides a lengthy description of park natural resources and lists research

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[260] Photo by author.
[261] *Statement for Management 1978,* 12.

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needed in the future.[262] This section focuses on aspects of the floodplain ecosystem and wildlife. However, wilderness management of areas defined as potential wilderness is not discussed in detail as part of this RMP.

The 1982 RMP better represented Congaree's cultural resources, largely because it incorporated recent research and archeological survey by Michie. The 1982 RMP noted that the archeological survey suggested humans had inhabited the area for at least the past 10,000 years.[263] Additionally, the 1982 RMP listed nine total historic sites and twelve identified prehistoric sites. Although not all of these sites possessed sufficient significance to be listed on the National Register of Historic Places, they provided the beginnings for better understanding the depth and type of relationship over time between nature and human activity in the park.[264]

The 1982 RMP focused on two types of historic structures found by Michie. These were earthen-work cattle mounts and dikes. The 1982 RMP described the cattle mounts as "phenomena, confined in South Carolina to the lower Congaree River Valley, and they represent a previously unrecognized form of environmental adaptation within swampy bottomlands."[265] The cattle mounts are essentially earthen mounds that rise several feet above the surrounding floodplain to provide high ground for ranging cattle during periods of flooding.[266] The document recognized the value of these resources as historical artifacts of a unique interaction between human activity and nature in the park that was previously unknown to historians.

Likewise, the 1982 RMP described the dike system as the farthest inland in South Carolina and evidence of attempts to develop the area for agricultural use.[267] The dikes represented another

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[262] *Resource Management Plan and Environmental Assessment.* Congaree Swamp National Monument. National Park Service, August 11, 1982, 4.
[263] *Resource Management Plan and Environmental Assessment 1982*, 30.
[264] *Resource Management Plan and Environmental Assessment 1982*, 30.
[265] *Resource Management Plan and Environmental Assessment 1982*, 31.
[266] *Resource Management Plan and Environmental Assessment 1982*, 31.
[267] *Resource Management Plan and Environmental Assessment 1982*, 32.

aspect of the relationship between human activity and nature in the area's history that was

unknown to historians. Regarding both the dikes and cattle mounts the 1982 RMP stated:

> Furthermore, these earthen structures represent a cultural resource with a potential to educate the public about past lifeways and thereby bring about an awareness and realization of historic events that occurred more than a century ago. Additionally, these large and impressive structures enrich and enhance the heritage of South Carolina, and by these virtues, they have considerable public significance.[268]

This statement demonstrated a high level of awareness of the cultural and historic value of

the cattle mounts and dikes. Those resources represent an important link between human activity

and the Congaree floodplain environment and provide the opportunity to educate the public about

Congaree's human past. Additionally, because the cattle mounts and dikes represent distinct sites

within a larger natural resource context, they provide an opportunity for site-specific

environmental history to guide specific management action. However, while the 1982 RMP

thoroughly described the characteristics and significance of the cattle mounts and dikes, the

document offered no specific management guidance for protecting those resources or

incorporating the history of those sites into the park narrative. Although the Michie report only

surveyed ten percent of the park's area, the 1982 RMP argued that it provided enough information

about the park's cultural resources to guide management decisions at that time.[269] However, the

report recommended additional cultural resource studies to develop a more comprehensive

understanding of park resources, but did make those studies a management priority.[270]

The 1982 RMP discussed the challenges to CRM at Congaree, focusing on natural forces

including erosion and wild pigs. The document recommended observation as the primary

management tool for cultural resources within the park, and specifies areas where that should be

studied. However, the 1982 RMP also stated that because the park was not open to the public no

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[268] *Resource Management Plan and Environmental Assessment 1982*, 32.
[269] *Resource Management Plan and Environmental Assessment 1982*, 35.
[270] *Resource Management Plan and Environmental Assessment 1982*, 35.

management action was required. The park could not open to the public until the hunting lease expired, but the 1982 RMP does not explain why this means that management action was not required.

The 1978 SFM and 1982 RMP acted as the primary management policy documents guiding Congaree during the 1970s and 1980s. These documents guided the park as it opened to the public in 1983, but they focused on developing the park and guiding the acquisition of additional land.[271] However, even during this early era of Congaree, progression is evident in the establishment of a management emphasis on planning and the creation of a park narrative. In particular these two documents described a management structure that prioritized natural resources for protection, study, and park interpretation. This, of course, is expected because natural resources motivated Congaree's creation.

Congaree's early planning documents' discussion of cultural resources focused on completing baseline studies and, following the 1980 Archeological survey, the 1982 RMP clearly described the importance of certain cultural resources to understanding human history within park boundaries. Although the 1982 RMP recognized the significance of cultural resources, it did not incorporate those sites into the park narrative. Congaree's cultural resources, especially the cattle mounts and dikes, lend themselves to using site-specific environmental history as a tool to understand and share the historical relationship between the floodplain environment and human activity. Because the landscape is unique, so were the human interactions with that landscape. Communicating that history through interpretation to the public could offer a more complete park narrative, however, neither of the primary planning documents expressed incorporating human history into the park story as a management priority.

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[271] *Statement for Management.* Congaree Swamp National Monument. National Park Service, 1989, 25.

<u>First GMP to Creation of Congaree National Park</u>

With the first draft of Congaree's General Management Plan completed in 1987 and the final version released in 1988, Congaree Swamp National Monument's management direction was more clearly defined. Although it offered comprehensive planning for the park, the GMP dealt with the same issues discussed in the 1978 SFM and 1982 RMP. The GMP did provide more resource-specific management direction, but it deferred to national legislation or NPS-wide policy when describing management goals, more so than earlier documents. Planning documents issued during the early 1990s continued this trend by providing additional guidance for park management of specific resources. The GMP and other planning documents leading up to the park's transition from national monument to national park demonstrate a progression toward more resource-specific management, but they did build a more complex and comprehensive park narrative integrating the significance of cultural resources.

Congaree released the 1987 Draft General Management Plan, Wilderness Suitability Study, and Environmental Assessment, a year prior to additional land acquisition and wilderness designation. The 1987 GMP content is repeated in the 1988 GMP, yet the Wilderness Suitability Study is not replicated in the later GMP. The 1987 GMP states that the majority of the park was eligible for wilderness designation, including all lands with no signs of recent logging and areas not slated for visitor development.[272] The Wilderness Suitability Study included areas that had been recently logged in areas designated as potential wilderness. It stated that as soon as the land "returns to a state where man's imprint on the land is no longer readily apparent, those lands will be designated wilderness."[273] Regarding wilderness management, the document states that,

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[272] *General Management Plan, Wilderness Suitability Study, Environmental Assessment*. Congaree Swamp National Monument. National Park Service, September 1987, 25.
[273] *General Management Plan 1987*, 26.

Designation of the monument as wilderness or potential wilderness underscores the preservation/protection objective. However, other than imposing a limitation on the type of tools/equipment used in maintenance of the dispersed facilities as previously described, designation will not result in changes in planned management activity.[274]

In part this statement reaffirmed that the park already had been managing these areas as wilderness, however, it also continued the lack of specific wilderness management guidance provided in earlier planning documents. The 1987 GMP cited the park's enabling legislation as the reason that management did not need to be altered to meet wilderness needs.[275] Presumably this was because Congaree management considered the park's enabling legislation to be a strict enough mandate for the treatment of natural resources as wilderness.

The final version of Congaree's first GMP came in December 1988 following land acquisitions and wilderness designation approved by Congress in October 1988 by Public Law 100-524. The 1988 GMP expressed its purpose as establishing the fundamental "management philosophy" and providing management objectives for the park.[276] The GMP laid out two basic management strategies. First, develop management plans providing stewardship over park resources. Second, create management plans supporting suitable visitor use.[277] The 1988 GMP directed all park management and projects to conform to these management strategies.

Although these two strategies are broad and non-specific, the 1988 GMP offered a description of "park specific management issues."[278] These issues related primarily to park development, including: "securing access through private land to the park," increasing visitor use and defining appropriate visitor use, expanding visitor orientation, and the decision of how to

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[274] *General Management Plan 1987*, 26.
[275] *General Management Plan 1987*, 26.
[276] *General Management Plan*. Congaree Swamp National Monument. National Park Service, December 1988, 1.
[277] *General Management Plan 1988*, 1.
[278] *General Management Plan 1988*, 2.

handle the inactive hunting camp.[279] However, these park-specific resources did not deal with issues directly affecting natural or cultural resource management, or the administration of wilderness.

The primary management impact of the 1988 GMP was the establishment of management zones. The document created a Natural Zone and a Development Zone, each with various sub-zones.[280] These zones were an extension of the Congaree's recent boundary adjustments and need to develop a Land Protection Plan. Each zone provided guidance for what operations could be carried out and how those operations could be carried out, and established management goals specific to that zone. The section of the GMP devoted to outlining resource management states, "The selection of management zones… indicates that conservation of natural resources and processes, and accommodation of uses that do not adversely affect those resources and processes, will guide management actions."[281] This section also pointed to the expansion of park boundaries and the division of additional land into management zones is a fundamental aspect of resource protection. Although it offered little management policy specific to the Congaree's natural resources beyond dividing the park into management zones, the document followed the lead of earlier planning documents by describing the park's natural resources in detail and providing an inventory of natural resource types in the park.

The 1988 GMP provided the same basic description and inventory of Congaree's cultural resources as the 1982 RMP. Unlike the 1982 RMP, the 1988 GMP refered to the park's stewardship requirement for cultural resources as specific by Executive Order 11593 and the National Historic Preservation Act.[282] However, the understanding of the park's cultural resources

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[279] *General Management Plan 1988,* 2.
[280] *General Management Plan 1988,* 20.
[281] *General Management Plan 1988,* 26.
[282] *General Management Plan 1988,* 14.

was little changed from the 1982 RMP. The 1988 GMP reiterated the value of certain cultural resources including the cattle mounts and dikes. The 1988 GMP stated, "the dikes and cattle mounts provide information about previously unrecognized cultural patterns of the cattle raising industry and the cultivation of cash crops in bottomland environments. These patterns are unique to the central portion of South Carolina, and especially the lower Congaree River valley floodplain."[283]

The 1988 GMP also described some of the challenges facing CRM in the park. These concentrated on environmental factors such as flooding, erosion, vegetation, and wild pigs.[284] The document also directed the hunting club structures be removed "to promote natural revegetation" and allow structures with similar function to be built out of visible areas.[285] The hunting club structures were not historic at the time of the 1988 GMP, but intentionally removing buildings that demonstrate a historic human activity, hunting and recreation, further separated the lands actual history from the history being shared with the public.

While the 1988 GMP provided a summary and limited guidance for CRM within the park's original boundaries, it did not cover any of the newly acquired land. The document mentioned that the land acquisition would help protect cultural resources, but inclusion of those cultural resources was collateral to the desire to bring the floodplain environment under park control.[286] The 1988 GMP directed future cultural resource surveys and research, but did not indicate that these were a management priority.

Congaree's approach to CRM and value of human history in the park was also expressed in the 1988 GMP's discussion of visitor use and the interpretive themes and programs that would be

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[283] *General Management Plan 1988,* 14.
[284] *General Management Plan 1988*, 14.
[285] *General Management Plan 1988*, 25.
[286] *General Management Plan 1988*, 26.

the park's focus. The 1988 GMP described the primary visitor activities as "hiking, fishing, bird watching, canoeing, and primitive camping" and stated that those uses were appropriate for the park and no additional recreational activities would be introduced.[287] Visitor orientation was available at a temporary ranger station and provided limited interpretive displays of both natural and cultural items.[288] The 1988 GMP also articulated the park's three primary interpretive themes, including: "unique river bottom hardwood forest community associated with a swamp-like floodplain with visible river courses reflected in its topography and vegetative patterns," the "remarkable size of the trees including a number of national and state champions," and the "presence of swamp ecology of the hard wood type with relatively unspoiled flora and fauna."[289]

Figure 8: Pileated Woodpecker, Congaree National Park[290]

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[287] *General Management Plan 1988,* 16.

[288] *General Management Plan 1988,* 16.

[289] *General Management Plan 1988,* 18.

[290] Congaree National Park. Accessed February 15, 2014.
　　　http://www.nps.gov/media/photo/gallery.htm?id=36931B50%2D1DD8%2DB71C%2D070D2A5176B651C5
　　　&tagid=0&maxrows=20&startrow=21.

These were justified interpretive themes for Congaree, but the 1988 GMP also omitted the importance of interpreting human activity within park boundaries. The document stated, "cultural influences, e.g. Indian activities, farming, logging and hunting, are treated as a minor theme in monument interpretation."[291] The management objectives also provided guidance for environmental orientation, interpretation, and education in the park, but did not direct the interpretation of cultural resources.[292] The management objectives focused on environmental education as an outreach tool for school and other groups.[293] This, too, did not discuss sharing the history of human interaction with the environment.

The 1988 GMP demonstrated progression from earlier planning documents by providing a more comprehensive and resource specific management direction. However, the 1988 GMP was not entirely comprehensive. The document's primary shortcoming was establishing a management structure for newly acquired land without an adequate evaluation of resources included in those areas. Although the 1988 GMP directed resource inventories and research for new park lands regarding both natural and cultural resources, it did not direct differentiate management of new lands from those lands originally under park control. There was little change between the 1987 Draft GMP and the final version released in 1988 following new land acquisition. This tight timetable prevented the 1988 GMP from being a truly comprehensive document. The planning documents released in the early 1990s demonstrate the progression from the generalness of the 1988 GMP to more specific guidance.

The 1989 Statement for Management provided addition guidance, but also reflected many of the management objectives expressed in earlier planning documents. The 1989 SFM expressed similar summaries of park resources, as well as the park's purpose and significance. The 1989

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[291] *General Management Plan 1988*, 18.
[292] *General Management Plan 1988*, 42.
[293] *General Management Plan 1988*, 43.

SFM recognized the significance of cultural resources, but repeated the emphasis that management objectives and interpretive themes should focus on natural resources.[294] However, the document did communicate the importance of incorporating cultural resources into future park interpretive themes and research; yet continued to position cultural resources as secondary to natural resources and wilderness values. The 1989 SFM stated, "documentation and interpretation of man's influence on the natural system will be necessary in future visitor center displays and brochures as a sub-theme."[295] Later, when describing park needs, the document stated the importance of acquiring outside assistance to "adequately document and interpret the historic and prehistoric occupations" related to Congaree's environment.[296]

This demonstrates recognition of the value of incorporating cultural resources into the park narrative and draws a connection between human activity and the park's natural characteristics. This recognition provided an example of how Congaree could use environmental history as a tool to develop a more comprehensive park narrative that considered the relationship between the park's human activity and natural features. Although the 1989 SFM stopped short of using environmental history as a management tool, the document expressed the value of studying the relationship between culture and nature.

While the 1989 SFM discussed cultural resources it also clearly stated that the primary goals for management and visitor use related to natural resources and wilderness. The 1989 SFM prioritized the development of a Land Protection Plan, Wilderness Management Plan, revised Resource Management Plan, and a visitor use survey.[297] The 1989 SFM's Management Objectives also stated that the priority for developing visitor use should be providing orientation and

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[294] *Statement for Management 1989,* 16.
[295] *Statement for Management 1989*, 18.
[296] *Statement for Management 1989,* 19.
[297] *Statement for Management 1989,* 35.

information about natural features and processes.[298] The 1989 SFM also indicated that Congaree should better manage parklands as wilderness, but beyond directing the development of a Wilderness Management Plan the document did not provide specific guidance.[299]

Although the 1989 SFM, as well as earlier planning documents including the 1988 GMP, called for resource studies, this was not a substitute for management direction. In particular, this created a void in management policy until the resource study was complete at which point Congaree would still need to actually incorporate that information into management policy. In considering later management documents, the impact, or lack of impact, of resource studies will be examined to attempt to understand their influence on park management policy.

The 1993 Resource Management Plan incorporated additional resource studies, but also expressed the limitations of park management relating to limited park staff and funding. The document stated that because of limited staff numbers and expertise, "only critical issues and resource management program requirements can be addressed at any given time, which does not give justice to the area as a whole."[300] In 1993 Congaree had eight permanent staff, only four of whom were dedicated to resource protection and interpretation.[301] Congaree's intention was that the 1993 RMP, through the description of specific projects and management policy, should direct the efficient use of "scarce personnel and financial resources" in meeting park management goals.[302] The 1993 RMP recommended creation of a permanent Resource Management Program to coordinate park research, management, and protection efforts over both natural and cultural resources.[303] A permanent and integrated Resource Management Program offered an opportunity

[298] *Statement for Management 1989*, 37.
[299] *Statement for Management 1989*, 36.
[300] *Resource Management Plan*. Congaree Swamp National Monument. National Park Service, December 20, 1993, 19.
[301] *Resource Management Plan 1993*, 19.
[302] *Resource Management Plan 1993*, 20.
[303] *Resource Management Plan 1993*, 19.

to bring together cultural and natural resource management to create a more comprehensive park story.

However, the 1993 RMP prioritized natural resource management projects, defining project categories as hydrology, vegetation, air quality, threatened and endangered species, exotic plant and wildlife management, fire management, illegal hunting, and acquiring additional lands.[304] The descriptions of these projects did not consider their impact on cultural resources or the need to also understand how past human action affected the park.

The discussion of CRM in the 1993 RMP cites Dr. James L. Michie's 1980 archeological survey as the primary source of historical information for Congaree. The 1993 RMP provided a basic summary of the park's cultural resources and calls for additional cultural resource studies. The document also acknowledges that the cultural resource management at the park has received little attention, but justifies this by citing the lack of known cultural sites.[305] Despite this position, the 1993 RMP does offer site-specific management guidance for several of Congaree's known cultural resources.

The 1993 RMP established an approach to CRM in association with guidance from the South Carolina State Historic Preservation Office. This approach created two different management strategies for Congaree's cultural resources. The first called for "passive management of resources that do not meet the eligibility criteria for inclusion on the National Register of Historic Places."[306] The second directed the "active protection of sites pending or eligible for the National Register."[307] The passive management approach would cause those resources to deteriorate through the effect of natural forces, although detrimental human activity

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[304] *Resource Management Plan 1993,* 21-32.
[305] *Resource Management Plan 1993,* 39.
[306] *Resource Management Plan 1993,* 43.
[307] *Resource Management Plan 1993,* 43.

would be prohibited. Additionally, the document acknowledges that assessment of those sites was based on only the preliminary archeological assessment and would require additional archeological surveying.[308]

For cultural sites actively managed under the 1993 RMP, management direction included the use of enclosures to control "burrowing or rooting animals."[309] While these CRM directions did not provide lengthy guidance, they did refer to environmental conditions specific to cultural sites found in Congaree. Additionally, it demonstrated a hierarchy of cultural resources to protect – the more highly valued sites over those with less significance. Although this CRM policy did not demonstrate the intentional removal of non-significant historic sites from Congaree, over time this policy had the effect of diminishing the imprint of human activity on the land. The 1993 RMP's direction for the future Wilderness Management Plan to identify those structures to be removed to better meet wilderness characteristics also had the potential to lessen the role of cultural resources in the park's interpretation of its history.[310]

The 1993 RMP did state the importance of developing a cultural resource management program at the park. This program would focus on inventory, resource management, and training for park staff.[311] The goals and needs of a CRM program included a structure inventory, comprehensive archeological survey of additional lands as well as reevaluating known sites, developing a program to manage impact of wild hogs, revisiting National Register nominations, and providing additional Section 106 and ARPA training for park staff.[312]

Although the 1993 RMP did not emphasize cultural resource management, it did provide more specific management guidance than previous Congaree management documents. The 1993

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[308] *Resource Management Plan 1993*, 43.
[309] *Resource Management Plan 1993*, 43.
[310] *Resource Management Plan 1993*, 50.
[311] *Resource Management Plan 1993*, 43.
[312] *Resource Management Plan 1993*, 49.

RMP built on the resource studies suggested by previous management policies, particularly for

natural resources, but also incorporated the information related to the completion of National

Register nominations. The 1993 RMP did not present an integrated park narrative considering

both cultural and natural resources, but offered more CRM guidance than earlier documents.

While passive management strategy for some cultural resources and the identification of structures

to remove from wilderness negatively impacted many park historic resources, the 1993 RMP did

elevate the importance of CRM as a distinct responsibility of park management. However, the

1993 RMP did not make a connection between CRM and the incorporation of human history into

a wider understanding of wilderness in the park.

Figure 9: Lower boardwalk during flood, Congaree National Park[313]

The last major planning document before the park was officially re-designated Congaree

National Park in 2003, was the 1994 Statement for Management. The 1994 SFM provided

additional guidance for management actions and goals with regard to cultural resources. In

particular, the 1994 SFM described several specific cultural resource management goals. These

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[313] Congaree National Park. Accessed February 15, 2014.
    http://www.nps.gov/media/photo/gallery.htm?id=380315C9-1DD8-B71C-0761F7ECD1327C6D.

included: clarifying boundaries of historic resources, reevaluating the significance of National Register sites, submitting additional National Register nominations, monitoring conditions and developing strategies and mitigation, conducting archeological surveys and cultural sites inventory for recently acquired lands, completing a study of "Huger's Ferry, and conducting a new archeological survey for the entire park.[314] Many of these goals were based on the NPS's appreciation that the park's inventory of historical and archeological resources was incomplete. The 1994 SFM noted that to be in compliance with the National Historic Preservation Act, Congaree needed to complete historical and archeological assessments.[315]

These goals provided more resource-specific management guidance than earlier planning documents and created an opportunity to incorporate human history with the natural features of the park. Although the 1994 SFM provided this opportunity, it continued to downplay the importance of cultural resources as an aspect of park interpretation. The 1994 SFM stated, "Management objectives focus on natural processes… cultural influences on the natural system… will be treated as a minor subtheme in interpretive programing."[316] This management decision continued the existing preference for excluding human history from the park's narrative. Although planning documents leading up to and including the 1994 SFM recognize the relationship between human activity and the Congaree's natural features, these documents do not direct management to take the next step and integrate that understanding into the park's wilderness narrative.

The 1994 SFM did demonstrate one area of clear overlap in cultural and natural resource management. The wild pig population at Congaree damaged both cultural and natural resources, making it a similar management problem for both resource types. The 1994 SFM also drew the

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[314] *Statement for Management, Basic Operations Statement.* Congaree Swamp National Monument. National Park Service, 1994, 33.
[315] *Statement for Management 1994*, 15.
[316] *Statement for Management 1994*, 11.

connection between the end of hunting in the area and increases in wild pig populations. It states: "Since 1982, when all hunting was abolished, there has been a recognizable increase in feral hog and white-tail deer populations."[317] This management problem also highlighted the impact of a previous human activity that no longer exists inside park boundaries. While the 1994 SFM recognizes this issue, it did not argue that this relationship should be an aspect of interpretation. This is unfortunate because it otherwise created a specific opportunity to use environmental history to unite cultural and wilderness themes to allow the public to better understand the park's landscape.

The management documents from the late 1980s through the 1994 SFM demonstrate a progression toward more resource specific management policy. These documents also recognize the relationship between human activity and the natural features of the park, particularly in relation to the cattle mounts and dikes. While these management policies express an understanding of the unique nature of those cultural resources as well as their potential to educate the public about the history of human use within Congaree, they simultaneously overlook the opportunity to integrate cultural resources into interpretation and the park narrative.

The management policies during this period also demonstrate a progression toward a larger focus on the need for and requirements of cultural resource management. This progression echoed shifts that occurred during this period for the NPS as a whole. Although these documents do not suggest that CRM should be a priority for Congaree – in fact most suggest the opposite – they do recognize the park's stewardship responsibility for cultural resources. In general, that understanding increases from one management document to the next. This trend is representative of the movement in the NPS as the agency became more familiar with the requirements of 1960s national legislation and moved toward resource management, rather than park development. The

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[317] *Statement for Management 1994,* 14.

next section will examine how this trend continued as Congaree Swamp National Monument transitioned to Congaree National Park, how additional planning documents shaped Congaree's CRM policy, and how the park approached the relationship between culture and wilderness.

Policy During the Era of Congaree National Park's Creation

The trend toward increasing awareness of the stewardship requirement of cultural resources continued as the Congaree Swamp National Monument made the transition to Congaree National Park in 2003. Although substantial change to the park's enabling legislation were proposed in both the House of Representatives and Senate that would have significantly elevated the importance of cultural resources in Congaree, these laws were not enacted. Public Law 108-108 included only a name changes, land acquisition, and additional wilderness designation.[318]

The proposed act, House Resolution 2580, would have substantially altered Congaree National Park's enabling legislation. H.R. 2580 provided a detailed description of the park's natural resources and reaffirmed the park's central commitment to the protection of those resources and sharing them with the public. However, H.R. 2580 also proposed specifically including cultural resource protection, management, and interpretation as a part of the park's purpose, an aspect entirely missing from the 1976 enabling legislation. H.R. 2580 stated that part of the park's purpose was "to protect and interpret the site of McCord's Ferry and other cultural features that illustrate the evolving agricultural and commercial practices in the South during the Colonial and Antebellum periods."[319] The proposed act also mentioned other archeological and historic elements in or related to the park, including the cattle mounts, dikes, and Hernando de

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[318] *An Act Making Appropriations for the Department of the Interior…* Pub. L. 108-108, 117 Stat. 1241, 2004.
[319] House Resolution 2580, 2003.

Soto's journey through the area.[320] However, since this act was not enacted, cultural resources were not legislatively elevated as a park purpose.

The primary management policy released after the renaming of Congaree National Park was the 2004 Resource Management Plan. Although the 2004 RMP refers to H.R. 2580, it is not required to adhere to the act since it did not become law. Despite this, the 2004 RMP does incorporate a heightened emphasis on stewardship of cultural resources and note opportunities to expand the cultural and historical context for the park beyond park boundaries.

Figure 10: Map of current Congaree National Park boundary, trails, and amenities, Congaree National Park[321]

The 2004 RMP provided a general argument for the significance of cultural resources to the park narrative and specifically described those resources as demonstrating the historical relationship between human activity and Congaree's floodplain environment. The 2004 RMP

[320] House Resolution 2580, 2003.
[321] Congaree National Park. Accessed February 15, 2014. http://www.nps.gov/cong/planyourvisit/maps.htm.

stated, "historical research has revealed that more people may have lived and worked in the floodplain during both the prehistoric and post-settlement eras than previously believed."[322] The document later read, "the historic sites that have been discovered within the boundaries of the park are all representative of environmental adaptation. Many sites are considered significant in understanding and recognizing historical events and processes, and in establishing facts and generalizations about the past."[323] In these statements, and others, the 2004 RMP made what was essentially an argument for environmental history as a tool to understand the human history of Congaree and relate it to the natural features of the park. However, it does not take the next step of integrating human history with the wilderness character of the park.

The 2004 RMP incorporated a 2003 Archeological Overview and Assessment completed by Meredith Hardy at the NPS's Southeast Archeological Center. Other recent archeological work was limited to Section 106 compliance within the park and concentrated on areas of planned development, rather than wilderness areas..[324] Hardy's survey and report provided a more comprehensive understanding of archeology and history of human activity in Congaree National Park and importantly provided a better source of information about cultural resources from which to base management decisions. Although Hardy's report was mostly a summary of previous archeological work, the additional information and interpretation guided specific management policy and action in the 2004 RMP.

The 2004 RMP provided a description of cultural resource management projects and specific needs of the CRM program. The document noted that, "the overall cultural resource management program at the park has received minimal attention due to the paucity of known

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[322] *Resource Management Plan 2004,* 43.
[323] *Resource Management Plan 2004,* 46.
[324] *Resource Management Plan 2004,* 50.

cultural sites present."[325] The description of Congaree's CRM program focused on its lack of resources and the general need for additional information. However, the document indicated that developing and incorporating additional cultural resource information was a management priority, where earlier planning and policy documents had not considered cultural resource management a priority.

The 2004 RMP specified several CRM needs that indicate the importance not only of expanding the understanding of cultural resources, but also the importance of better understanding the relationship between human activity and Congaree's unique natural environment. One need was the completion of an "Ethnographic Overview and Assessment [that] would provide information necessary to address various questions regarding the historical occupation, land use, and ethnic diversity of the people who utilize the park area."[326] This would focus on oral histories for people associated with the park that could help better understand how those people, as well as their ancestors, interacted with the landscape. In particular, oral histories would target "descendants of the former slaves who worked at local plantations, as well as former owners and tenants of lands now held by the park."[327]

An additional need expressed by the 2004 RMP was the completion of a comprehensive Historic Resource Survey including both the park and immediate surrounding areas. This process included the nomination of eligible historic resources to the National Register of Historic Places.[328] The document noted that although a List of Classified Structures report was completed in 1995, the park still lacked a comprehensive inventory of historic resources.[329]

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[325] *Resource Management Plan 2004*, 53.
[326] *Resource Management Plan 2004*, 55.
[327] *Resource Management Plan 2004*, 55.
[328] *Resource Management Plan 2004*, 55.
[329] *Resource Management Plan 2004*, 55.

The need for an ethnographic study as well as a Historic Resource Survey are significant because they demonstrate Congaree's desire to expand the park's cultural context beyond the artificial park boundary. These studies would provide an opportunity to treat the culture and history of the park as part of a larger story, and tie the park's narrative to the history of the surrounding area. Additionally, these studies would build a better understanding of how humans had shaped the landscape, and how the environment had affected human history in the area. This marks a significant progression in the management policies and priorities from earlier planning and policy documents that focused almost exclusively on Congaree's natural features and processes. By building a better connection between human history and the landscape, Congaree will also be able to shape management policy and action with respect to site-specific environmental history.

Conclusion

Congaree National Park's management policy demonstrates a management approach that has generally favored nature and wilderness over history. Congaree's policy is an amalgamation of numerous factors, but ultimately results from park-level interpretation of the park's enabling legislation, national legislation, NPS-wide guidance, and an evolving understanding of park resources. Congaree's policy today indicates a growing recognition of cultural resources as part of the park's significance and expresses the need to better understand cultural resources. This progression is a product of the ambiguity of national legislation and NPS-wide policy. Congaree has been able to interpret and implement the broad management framework provided for the park to create and change management policy specific to Congaree's resources. This progression is also representative of the change that occurred in the NPS as a whole during the same time period as

issue of wilderness management and cultural resource stewardship evolved through as part of a social dialogue on the purpose and role of national parks.

Congaree National Park is currently developing new management policy including a new foundation statement and strategic plans. In the coming months this new policy will be released for public review. As the park finalizes this new policy it is essential that they incorporate new information about the park's history, clearly state the integration of cultural resources and wilderness management as a management objective, and express a park narrative that portrays Congaree as a place created through the complex interactions of history and nature. Congaree is entering a period in which park management has the opportunity to correct earlier management mistakes and elevate the importance of cultural resources within the park and communicate the important relationship between history and wilderness to park visitors.

CHAPTER 4

ANALYSIS

Since its creation in 1976, Congaree National Park's management policy demonstrates a general progression toward policy that is more inclusive of cultural resource management and increasingly values the relationship between human history and natural resources. Despite this progression, the policy also highlights areas of weakness in Congaree's approach to CRM. Some of these policy issues are beyond park management control since they relate to national legislation and NPS-wide policy that requires certain treatment of wilderness and natural resources. However, other aspects of Congaree's policy indicate park-level decisions that negatively impact cultural resources without a justifiable benefit to wilderness stewardship. Although cultural resource management has not been Congaree's focus, elements of Congaree's policy exhibit an increasing interest in protecting cultural resources and integrating the area's human history into the park's narrative.

Congaree's struggle to balance CRM with wilderness management is the focus of recent scholarship that criticizes the park's treatment of cultural resources. These articles reflect the wider debate about the relationship between culture and nature expressed by academics such as William Cronon, James Feldman, and Laura Watt. The articles focusing on Congaree concentrate on the value of integrating the historical narrative with the existing wilderness story. Like Cronon, these authors argue that without considering human history a place cannot be understood, even a place with rich natural resources such as Congaree.

Academic Criticism of Congaree National Park

In her 2011 article, "A Place of Nature and Culture: The Founding of Congaree National Park, South Carolina," author Elizabeth J. Almlie examines how Congaree's management policy diminished recognition of the park's human history by focusing on wilderness and natural resources. Almlie begins by evaluating the park's creation, emphasizing the impact of the grassroots movement's environmental values in shaping the policy that would guide park management toward wilderness values. The movement supporting Congaree's creation took place in the larger context of the environmental and wilderness movement of the 1960s and 1970s and expressed the values associated with that national movement. Almlie also notes that it was the debate between supporters and opponents of that park's creation that first separated the Congaree floodplain's human and natural story. Almie writes that supporters of the park understood that the Congaree floodplain, "had important historical components, but relegated history to a level where it did not interfere with the values of the natural resources and the forest's wilderness character."[330] For the park's opponents the area's history was a tool used "to negate any claim to the purity of the Swamp's natural conditions and insisted that forming a preserve would unalterably disrupt a continuum of history of economic enterprise, sports hunting, and private owners connection to the land."[331] By staging the argument as one between historic and natural values, the debate's winner would be diminishing a valuable aspect of Congaree's character.

Almlie notes that the supporters of Congaree National Park's creation view of the area's history was one of frontier wilderness and prehistoric Native Americans and, in doing so, lessened the value of history from the eighteenth, nineteenth and twentieth centuries that involved alteration

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[330] Almlie, Elizabeth J. *A Place of Nature and Culture: The Founding of Congaree National Park, South Carolina.* Federal History Online, Federal History, 2011, 6.
[331] Almlie, 6.

or use of the landscape.[332] The view that only the area's Native American and frontier history held

cultural value ignored the historic significance of resources such as the cattle mounts, dikes, and

local land use, including that by African slaves and, later, African American communities.[333]

Almlie argues that the wilderness-centric view of park supporters guided park management.

Almlie then describes how various policy documents continued to overlook historic values and

actively managed areas to develop wilderness. Almlie writes, "[the 1988 GMP] also shows… how

[park managers] were creating new managed wilderness by monitoring the condition of resources,

prohibiting the "cultural influences" of hunting, and encouraging the restoration of previously

impacted lands to natural appearances."[334]

      Almlie concludes her article by relating Congaree to the wider debate between wilderness

and culture in the National Park Service. As she alludes throughout her article, Almlie writes that

the supporters of wilderness believe that "acknowledging the human past of wild areas will be

used to justify their intensive use today."[335] Almlie argues that for supporters of natural and

wilderness interests, as well as natural and wilderness policy, this nature-centric view overlooks

the value of history as part of the understanding of natural areas. Almlie writes,

> The natural characteristics that visitors to a designated wilderness area love and value are the result of conscious decisions made by those who dwelt there and those who put that place within a federal system of protection. The recording and understanding of decisions made in the past and their consequences is essential for being able to judge what decisions to make in the future, both for the stewardship of the park and for visitors to carry back to the web of environments impacted by their own lives.[336]

Almlie's observations of the general conflict between wilderness and history, as well as her

analysis of Congaree's management policy offer an apt criticism of park management. However,

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[332] Almlie, 8.
[333] Almlie, 10.
[334] Almlie, 13.
[335] Almlie, 13.
[336] Almlie, 15.

Almlie's criticism focuses more on broad NPS-wide policy and national legislation over which

Congaree has little control. In terms of park management decisions about specific cultural

resources, Almlie focuses on how Congaree influences the way visitors experience and understand

the park through interpretation and public outreach, rather than Congaree's physical management

of cultural resources. This highlights the importance of the park's ability to affect how visitors

perceive and understand the history of a park and the relationship between wilderness and culture.

Mathew A. Lockhart's 2006 article, "The Trouble with Wilderness" Education in the

National Park Education Service: The Case of the Lost Cattle Mounts of Congaree," focuses on

many of the same ideas as Almlie's article. However, Lockhart specifically concentrates on

Congaree's management and interpretation of the cattle mounts in the context of wilderness in the

park. Lockhart poses his article around the argument that Congaree's interpretation of the park as

wilderness diminishes the value and understanding of the landscape as a place where humans and

nature interacted in the past.

Lockhart argues that Congaree's application of the Wilderness Act and related NPS policy

intentionally overlooks cultural resources and interprets the park exclusively for wilderness values.

Lockhart writes that the emphasis on wilderness management causes human history to be removed

from "park narratives and suppressed in interpretation."[337] Lockhart examines Congaree National

Park because of its high percentage of wilderness and the inclusion of cultural resources within

those areas.

Lockhart focuses on the cattle mounts as Congaree's most significant historic resources.

Lockhart states "the cattle mounts of Congaree Swamp are rare examples of agricultural

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[337] Lockhart, Mathew J. *"The Trouble with Wilderness" Education in the National Park Service: The Case of the Lost Cattle Mounts of Congaree.* The Public historian, Vol. 28, No. 2 (Spring 2006): 11-30, 11.

adaptation to a swamp environment in the state of South Carolina and the Lower South region."[338] The cattle mounts tell an important story of how Congaree's unique landscape shaped the lives of those who lived there in direct and distinctive ways. Lockhart also notes that the cattle mounts provide an insight into the area's African American history. Lockhart refers to the African Americans who built the cattle mounts and cared for the cattle as, "America's first Cowboys" and states that the "only evidence of the life's work of the anonymous builders of the cattle mounts… is the record they left in the landscape."[339] However, the issue at Congaree, as Lockhart points out, is not that the significance of Congaree's cultural resources is unknown; it is that Congaree has not interpreted those resources to the public.[340] Lockhart observes that one cause of this omission is Congaree's enabling legislation and subsequent management documents that emphasize the park's mission to protect wilderness values.[341] Lockhart goes on to argue that cultural resources in wilderness at Congaree have long been treated as disturbances that interfere with the area's wilderness characteristics.

However, Lockhart also notes that both the Wilderness Act and NPS policy allow the presence of cultural resources in wilderness, but those documents do not require the interpretation of those cultural resources. Lockhart states that this policy stance may be changing. He refers to the Wilderness Education Partnership Plan, which reads, "cultural and archeological sites found in wilderness can provide a more complete picture of human history and culture."[342] Similarly, Lockhart discusses the 2001 Guidance White Paper, Number 1, that stated that the "National

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[338] Lockhart, 22.
[339] Lockhart, 23.
[340] Lockhart, 24.
[341] Lockhart, 24.
[342] Lockhart, 24.

Wilderness Steering Committee of the NPS… identified the presence and proper treatment of cultural resources as a 'critical' stewardship issue facing the Park Service."[343]

Throughout his article, Lockhart echoes Cronon's argument that the current wilderness definition reflects a sharp division between nature and history, by being "black and white," rather than allowing flexibility in inclusion and interpretation of cultural resources found in wilderness.[344] Lockhart also reiterates James Feldman's idea of a "rewilding landscape" that could treat a landscape as a complex relationship between history and nature, instead of excluding either resource.[345] Lockhart argues that integrating the area's human history will allow Congaree to provide a comprehensive interpretation of the park's resources to the public. Lockhart does not suggest land should be removed from wilderness, but does argue that appropriate measures should be taken to protect cultural resources and educate the public with respect to the significance of historic resources and the story they tell about the history of adaptive land use in the Congaree floodplain. Congaree's unique cultural resources provide an excellent way for the park to educate visitors about how the environment shaped history, and how that history can still be witnessed as part of the landscape.

<div align="center">Policy Progression</div>

The criticism of Congaree's cultural resource management by Almlie and Lockhart highlights the park's failure to adequately protect cultural resources, communicate the significance of human history associated with the park, and articulate the relationship between human activity and Congaree's unique environment. Both authors point to the failures by park management, restrictive aspects of NPS-wide regulations, and the Wilderness Act's limitations on the

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[343] Lockhart, 29.
[344] Lockhart, 27.
[345] Lockhart, 27.

expression of human history as the source of Congaree's shortcomings. However, it is also important to understand that Congaree's resource management approach changed over time as the park's interpretation of legislation and NPS-wide policy evolved. The progression Congaree experienced did not occur in a vacuum, but demonstrate how changing ideas in the NPS, and society in general, about the management goal of national parks was manifest at the individual park level. Examining the progression of Congaree's management policy demonstrates that Congaree did not intentionally diminish cultural resources, but through a lack of information, staff, and funding, as well as park and resource specific policy which generally neglected to provide specific guidance for cultural resource management.

Congaree's enabling legislation, as discussed in the preceding chapter, provides the single most influential aspect of park policy affecting resource management. Every major Congaree policy document refers to the enabling legislation when defining the park's purpose and approach to resource management. The enabling legislation provides a clear indication that the park's emphasis is the protection of Congaree's natural features and wilderness characteristics. This sentiment remains from the park's creation in 1976 through the most recent Resource Management Plan issued in 2004. However, over this period the enabling legislation is gradually viewed more as a starting point for policy, rather than as a restricting document. This is evident by comparing the 1978 Statement for Management, 1988 General Management Plan, and the 2004 RMP. As discussed in the previous chapter, the 1978 SFM offers a strict adherence to the enabling legislation, focusing almost exclusively on natural resources and wilderness; the 1988 GMP maintains a strong emphasis on natural resources and wilderness, but incorporates new information about cultural resources; and the 2004 RMP provides a greater sensitivity to the needs of cultural resources and notes that Congaree's lack of emphasis on CRM in the past needs to be

corrected. These documents demonstrate that as time passes, Congaree's decision-makers have the ability to interpret their enabling legislation in a way that embraces CRM as a function of the park's purpose as a part of the park's character. These documents also illustrate changes that happened throughout the park service during this period as the NPS became an agency more concerned with balancing its responsibility to mange cultural, natural, and wilderness resources.

Analyzing Congaree's management policies in light of the Wilderness Act and NPS-wide policy also demonstrates a similar progression in Congaree's policy. In general this is reflected in a lack of direction for the specific management of types or individual resources. By the 2004 RMP, Congaree's policy provides more resource specific guidance and better incorporates the NPS-wide policy concerning CRM. However, management guidance specific to CRM in wilderness areas remains minimal throughout Congaree's history. Although Congaree park staff managed areas as wilderness since its creation and refers to the Wilderness Act and NPS-wide wilderness policy, Congaree has generated little management guidance specific to the particular wilderness found in the park. This lack of guidance for specific aspects of Congaree's wilderness not only weakened the park's wilderness management, it also missed an opportunity to better direct how the park handled the cultural resources within wilderness.

The progression of Congaree's cultural resource management was also affected by the park's slow development, continuing expansion, and lack of comprehensive cultural resource information. Although created in 1976, the park did not open to the public until 1983 because of a continuing hunting lease in the park. The policy in those first few years directed Congaree's limited staff and funding to park development, rather than resource study or management. The 1978 SFM and 1982 RMP directed the study of park resources, both natural and cultural, but each document notes that because the park was not open to the public no management action was

required at that time. Once the park opened to the public, management documents become more concerned with resource protection, but issues of park development and visitor use remained priorities.

Similarly, the park's delay in generating a GMP to guide park management slowed comprehensive wilderness and cultural resource planning. Although Congaree's enabling legislation made development of a GMP a priority for the park, a lack of information, efforts to extend park boundaries, and local political pressure slowed the process.[346] Without a comprehensive plan the earlier park management documents seemed to lack progression. While the GMP offered improved cultural resource management direction, it did not make an effort to integrate human history into the park narrative. Although part of that omission was by choice, it also related to a lack of information about cultural resources and the human history of the Congaree floodplain and an almost constant effort to have management policy keep pace with the park's expanding boundaries.

Another important aspect shaping Congaree's management progression was the acquisition of additional lands. Congaree's enabling legislation directed the park to identify adjacent lands to acquire to 'complete' the park's resources. For Congaree it was important to acquire additional lands to bring the majority of the Congaree floodplain under park control, since the enabling legislation only gave the park the Biedler tract, which contained only a portion of the Congaree floodplain. However, management documents show that the park struggled to quickly identify additional lands to acquire, and once land was acquired Congaree park staff were not equipped to manage and study the new lands. The park was trapped in a cycle in which they were adding new land to the park before fully understanding other land recently acquired.

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[346] Rametta, 72.

The 1988 GMP offers a good example of this situation. A final draft GMP was released by the park in 1987, but it covered only the park's original land area of 15,138 acres. It was revised in 1988 to incorporate an additional 6,840 acres, as well as formal wilderness designation. However, the 1988 GMP offers basically the same guidance as the 1987 version for resource management and presents the same information to justify Congaree park staff's decisions even though the park gained several thousand acres. The 1988 GMP was followed in the early 1990s by additional management guidance that would fill in some gaps, but draws into question the value of a GMP as a comprehensive planning document if it is not comprehensive.

This pattern was repeated for the 2004 RMP, which was created following another wilderness designation and significant land acquisition bringing the total park area to 26,776 acres. The 2004 RMP better incorporates management guidance for newly acquired land and states that the study and documentation of the new land is a priority. By NPS standards, Congaree is still a new park and has only recently acquired the necessary land to fulfill the park's mission to protect the Congaree floodplain. In many ways the inability of park planning documents to keep pace with land acquisitions represented growing pains of a new park.

The challenge of providing management policy for new parklands highlights another aspect affecting the progression of park policy. While Congaree's environment had been studied since the 1950s, investigation of the area's cultural resources only began once the park was created. From Congaree's beginning, this created a knowledge gap, making it difficult for the park to craft CRM policy for resources that it did not fully understand. Dr. Michie completed the park's first study and inventory of cultural resources in 1980. This archeological survey covered only about ten percent of the park's initial 15,138 acre area and did not cover any portion of the 11,638 acres of later land additions. However, Dr. Michie's report provided the primary justification for

Congaree's cultural resource management decisions until 2003 when the Hardy study was issued. Each of Congaree's policy documents cites the need to complete additional cultural resource management studies. It is reasonable that a park with limited staff and funds, and with a clear mandate to manage natural resources and wilderness, should put the majority of their effort into those aspects of management. However, the park's inability to make substantial progress on the study of cultural resources caused Congaree park staff to make CRM decision without a substantial understanding of the park's cultural resources.

The 2004 RMP does make a measure of progress from earlier planning documents. The 2004 RMP incorporates the archeological study completed by Meredith Hardy in 2003 and lists specific cultural resource studies that need to be completed and explains why those studies are important and how that information will be incorporated into the park narrative and interpretation. Because the 2004 RMP could incorporate more information, it is able to provide more specific guidance for Congaree's CRM and can more clearly articulate how additional information should inform future CRM decisions. The 2004 RMP demonstrates progression toward management policy shaped by specific resource information.

Site-Specific Environmental History at Congaree

The progression toward using specific resource information to guide management decisions provides an opportunity to consider how site-specific environmental history offers an opportunity for Congaree to better integrate human history and wilderness values into Congaree's park narrative. Although Congaree has not balanced history and wilderness well, there are examples of Congaree effectively applying environmental history to specific sites and

management situations. These examples demonstrate the viability of environmental history as a important informational tool to inform management decisions and shape a park's narrative.

The cultural resources for which Congaree best incorporates site-specific environmental history are the cattle mounts and dikes. The planning documents, beginning with the 1982 RMP, discuss the cattle mounts and dikes as distinct elements of the landscape that indicate a previous way of life in the Congaree floodplain. These documents reflect the description of the cattle mounts and dikes provided in Dr. Michie's report, which clearly stated that those resources were of particular significance to understanding the relationship between human activity and the floodplain environment. Although Congaree recognized this relationship, that information was not used to inform specific management policy or action. When discussing the need for additional cultural resource studies, the policy documents also express the value of that research as a tool to better understand the human-nature relationship in the park's past. However, until the 2004 RMP these documents offer only minimal guidance for managing the cattle mounts and dikes, or incorporating that information into park interpretation.

The 2004 RMP describes cultural resource studies and historical research as an important management tool in better understanding the relationship between human history and the floodplain environment. In particular, the 2004 RMP makes a connection not seen in previous documents by recognizing the cattle mounts and dikes as "environmental adaptations."[347] This demonstrates an environmental history analysis of the resources and highlights them as indicative of the relationship between human activity and the unique floodplain environment. Furthermore, the cultural resources studies, such as the ethnographic study specified by the 2004 RMP, have the potential to provide information that can be directly applied to better understand how humans interacted with nature in the past.

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[347] *Resource Management Plan 2004,* 46.

While Congaree's management documents progress toward a better understanding of the relationship between human history and nature, this understanding has not translated to management policy designed to affect both cultural and wilderness. However, there are aspects of management policy at Congaree that directly relate to both cultural resource and wilderness management. The primary area of overlap between cultural resource and wilderness management are the threats that simultaneously affect both resources types. The management documents refer to the threats to cultural resources as being mainly vegetation, animals, or environmental factors such as erosion and flooding. In particular, the management of wild pigs and white tail deer is seen as both a wilderness and cultural resource management problem. The increase in wild pig and white tail deer populations in the park itself demonstrates the correlation between human activity and nature, even in areas of designated wilderness. The wild pig and white tail deer populations grew following the prohibition of hunting within the park. This ended hunting as a human activity that had likely existed in the area for thousands of years and highlights how a particular human action perceived as incompatible with wilderness, was actually fundamental to the landscape's 'wilderness' characteristics. This example demonstrates how Congaree's resource management needs can overlap and could benefit from increased integration and a better understanding of the relationship between human history and wilderness in the park.

At Congaree, site-specific environmental history is apparent in the discussion of the values of cultural resources and the importance of those resources in understanding the relationship between human history and nature in the park. This general trend is best articulated in the 2004 RMP. With the exception of the 2004 RMP, Congaree's management documents represent a poor integration of the understanding of the relationship between human history and wilderness. What all Congaree planning documents lack, including the 2004 RMP, is a clear connection between the

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value of understanding the relationship between culture and wilderness in the park and sharing that understanding with the public. Site-specific environmental history offers a methodology for uniting the cultural and wilderness narratives to provide a more comprehensive understanding of how and why Congaree exists as it does today.

<p align="center">Conclusion</p>

Congaree National Park's management policies, from its establishment in 1976 to the guidance provided in the 2004 RMP, demonstrate a progression toward better treatment and interpretation of cultural resources. However, 'better' does not yet mean adequate. The understanding of the relationship between culture and wilderness represented in the 2004 RMP means nothing if that understanding is not communicated to the public. Congaree faces the added challenge of interpreting essentially inaccessible cultural resources entirely located within wilderness and integrating an understanding of cultural resources with a park narrative that has been one of nature and wilderness since the park's creation. This challenge may, in fact, present Congaree with an opportunity as it develops new policy in 2014 to rethink how wilderness and culture should relate. The park's human history and cultural resources are the product of a relationship between humans and a unique environment. Congaree has the opportunity to integrate this story with its broader park narrative without lessening the park's value of the its natural resources. As Congaree crafts new policy, park management essentially faces a choice between ignoring wilderness values, continuing to ignore human history, or finding a way to integrate the two currently separate messages into a single comprehensive narrative and management approach.

CHAPTER 5

RECOMMENDATIONS AND CONCLUSION

Congaree National Park is a place in which nature and the sense of wilderness can overwhelm the individual. The towering trees, haunting echoes of owls and wood peckers, and solitary condition with which one can move through the landscape give the visitor a sense of a connection to the world that existed before European settlers felled the New World's old growth forests. This sense of a connection is one of Congaree's most valuable aspects and was a primary motivator in the park's creation. Analysis of the park's management history demonstrates a policy structure favoring wilderness and natural features over cultural resources. The task now is to unite the evocative natural and wilderness narrative with an equally significant human story. The goal of the following recommendations is to provide a pathway to improve Congaree's cultural resource management in a wilderness context and better integrate cultural themes into the park's narrative. In doing so, this section will also address the primary research questions of this thesis.

This thesis' central research questions include: How has Congaree's management policy evolved over time? How does Congaree interpret its enabling legislations, national legislation, and NPS-wide policy? How does Congaree's management policy shape the park's narrative? How does Congaree manage wilderness? How can environmental history be applied as a management tool at Congaree? Each question is addressed in previous sections; however, what remains is a consideration of how Congaree and the NPS can move forward to develop better and more comprehensive management policy. The value of management policy is that it can guide Congaree and the NPS to move beyond old ideas and methods to embrace new approaches that can build a

narrative encompassing the natural and human story of the place and retain the wilderness experience.

<div align="center">Incorporating Adaptive Management Methods</div>

The analysis of Congaree's management history demonstrates that the park lacked information-based decision-making for cultural resources. This resulted from either insufficient knowledge or management's failure to incorporate new information into cultural resource policy. In 2003, the NPS issued a set of guidelines intended to aid in the comprehensive management of cultural landscapes and the natural resources they encompass. Although not specific to the resource management issues at Congaree, *A Handbook for Managers of Cultural Landscapes with Natural Resource Values* offers direction for cultural landscape managers to better integrate their management practices with the needs of natural resources. The document notes, "cultural landscapes result from the human interaction with the land [and] encompass a range of natural and cultural values."[348]

While Congaree does not possess any defined cultural landscapes, the park certainly possesses a variety of interrelated cultural and natural elements. The *Handbook* provides a number of recommendations for parks with cultural landscapes. These include coordination between cultural and natural resource management staffs, involving resource managers in planning, and engaging in public outreach and seeking public input.[349] Perhaps most relevant for Congaree, the *Handbook* directs park managers to practice a cycle of planning and "post-project evaluation" so that the park can understand the successes and failures of previous projects and apply those

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[348] *A Handbook for Managers of Cultural Landscapes with Natural Resources Values*. Conservation and Stewardship Publication No. 5, 2003, 6.

[349] *A Handbook for Managers of Cultural Landscapes*, 19.

lessons in the future.[350] This form of adaptive management is essential for a cultural landscape, as well as for resource management in general, because the cycle of monitoring, reevaluation, and planning allow managers to shift according to changing conditions. Jillian Cowley's article, *Moving Toward Integrated Resource Planning,* covered in the literature review of this thesis, expands on this idea. Cowley's idea that management policy should focus on "resource contexts" or landscapes, rather than individual resource types, also requires continual reevaluation of management policy.[351]

The "post-project evaluation" process recommended by the *Handbook* and Cowley's integrated resource management are simplified versions of adaptive management practices. This growing approach to resource management emphasizes management as a continual cycle of reevaluation, rather than as a linear task. This process begins with conceptualization of the management problem. Next, a plan is developed for management action as well as for how monitoring will occur. This is followed by implementation of the project and monitoring. Next, the project is analyzed and the data is used to adapt a strategic plan. Next, the new information and understanding is documented and shared. Then, the cycle begins again by re-conceptualizing the management problem.[352]

This cyclical management approach offers a powerful tool for all management situations, but is particularly effective for systems that are in constant change and incorporate different resource types. For Congaree, as well as the NPS in general, this methodology offers a tool to better evaluate the impacts of management on cultural and natural resources as well as wilderness values, and develop management policy that incorporates various resource types. By adopting an

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[350] *A Handbook for Managers of Cultural Landscapes*, 20.

[351] Cowley, 60.

[352] "Open Standards for the Practice of Conservation." The Conservation Measures Partnership, 2013. Accessed February 15, 2014.
http://www.conservationmeasures.org/wp-content/uploads/2013/05/CMP-OS-V3-0-Final.pdf, 5.

adaptive management approach, Congaree will for the first time have information based policy and be able to measure the impact of natural resource and wilderness management on cultural resources.

In addition to introducing the idea of adaptive management, the *Handbook* provides several case studies highlighting park projects in which cultural landscapes and natural resources are well balanced. The case study for Tallgrass Prairie National Preserve demonstrates the park's success in integrating public outreach and input into the planning process. Park managers sought out relationships with the surrounding communities and outside experts in the development of management plans. The result was management policy at the park in which the public was invested and demonstrates how the park utilizes public input in what was essentially part of an adaptive management approach. This case study offers an example for Congaree to consider when crafting management policy in the future. For a small park, such as Congaree, enlisting the nearby public in park planning and stewardship offers a way to incorporate new ideas and help the community connect to park resources. By enlisting the public as part of an adaptive management approach, Congaree can create management policy that better connects the pubic to park resources.

In general, an adaptive management approach also emphasizes the importance of communication and dialogue as part of the management process. Either with the public, among park staff, or between park units, integrating better communication and feedback provides a way to ensure that ideas are shared and understood by the individuals who can then apply that information to improve park management. Many of the management issues facing Congaree discussed in this thesis are problems of communication. Adaptive management allows park

management to build in communication and dialogue as part of the management methodology so that the exchange of information is less a matter of chance and more a standard course of action.

<u>Management Policy for History in Wilderness</u>

Although the *Handbook* provides management direction for nature in cultural landscapes, NPS-wide policy has historically failed to provide management guidance for cultural resources in wilderness contexts. However, just as Congaree experienced progression, so did the NPS. This, in part, is a function of a maturing system that no longer considers wilderness to be a solely natural resource. Management guidelines released by the NPS in January 2014, demonstrate a transition in the way the NPS directs parks to think about wilderness and offers direct guidance on the management of cultural resources found in wilderness areas.

In January 2014 the NPS released the *Wilderness Stewardship Plan Handbook: Planning to Preserve Wilderness Character* and *Keeping it Wild in the National Park Service: A User Guide to Integrating Wilderness Character into Park Planning, Management, and Monitoring.* These documents provide wilderness guidance to parks, but unlike earlier documents, this new guidance considers parks as complex communities of resources, each of which contribute to a park's story. Of the two documents, *Keeping It Wild* contains the most direct guidance for parks in which cultural resources and wilderness overlap. According to *Keeping It Wild,* all wilderness areas in the NPS system also contain cultural resources and a history of human use.[353] *Keeping It Wild,* more than previous NPS wilderness policy such as D.O. 41, argues that cultural resources are an aspect of wilderness character.[354] The document also supports this argument by referring to recent

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[353] *Keeping It Wild in the National Park Service: A User Guide to Integrating Wilderness Character Into Park Planning, Management, and Monitoring.* National Park Service, January 2014, 185.
[354] *Keeping It Wild in the National Park Service*, 91.

scholarly work demonstrating a "strong connection between cultural resources and wilderness," rather than offering unfounded management suggestions.[355]

However, *Keeping It Wild* does not suggest that the first four wilderness characteristics – untrammeled, undeveloped, natural, and solitary – should be sacrificed to care for cultural resources. The document states, "park and project manager need to fully consider the values and impacts of all resources as they develop management and operational plans and strategies for the programs and resources for which they are responsible."[356] This sentiment is expressed throughout the document's discussion of managing cultural resources within wilderness areas. *Keeping It Wild* emphasizes that management policy should balance cultural resource and wilderness values.

Keeping It Wild also addressed the legal conflict between cultural resource management and the requirement of wilderness management. The document notes that the commonly held perception that the Wilderness Act holds priority over cultural resources laws is incorrect. *Keeping It Wild* states that this view "has led some to view that cultural resources must be removed because they are 'developments' in an otherwise 'undeveloped' wilderness."[357] *Keeping It Wild* notes that sometimes CRM is used as an excuse to ignore wilderness rules. The document makes it clear that there is no hierarchy of laws and that "all cultural resource laws apply to all cultural resources in wilderness."[358] It goes on to say that "the congressional and policy mandate to park managers is to uphold both laws."[359]

For some parks, this connection between cultural resources and wilderness is clearer because it is explicitly included in the wilderness designation. *Keeping It Wild* mentions Mesa Verde National Park and Death Valley National Park as examples of parks with wilderness

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[355] *Keeping It Wild in the National Park Service*, 90.
[356] *Keeping It Wild in the National Park Service*, 90.
[357] *Keeping It Wild in the National Park Service*, 90.
[358] *Keeping It Wild in the National Park Service*, 91.
[359] *Keeping It Wild in the National Park Service*, 91.

designations that direct the park to "protect and preserve" cultural resources as part of the parks'

wilderness management responsibility. The document states, "In these cases it is understood that

cultural resources are part of the fabric of the wilderness and that wilderness designation protects

these resources."[360] However, most wilderness designations do not include such a nuanced view of

cultural resources as a part of wilderness character and create a conflict area for park management.

Keeping It Wild points to planning as the primary management tool for avoiding conflicts

between CRM and wilderness and emphasizes that is essentially an adaptive management

approach. The document also makes it clear that this should be an ongoing planning process in

that as new information is discovered, it should be incorporated into future management actions.[361]

Management policy for cultural resources in wilderness should consider the resource's historical

value as well as how it contributes to the character of the wilderness in which it is found.[362]

However, *Keeping It Wild* also notes that often a blanket policy cannot provide the management

guidance needed for all cultural resources. The document states that "managing cultural resources

in wilderness will require case-by-case application of the framework" offered in *Keeping It

Wild.*[363] The document directs parks to complete a "minimum requirements analysis" for cultural

resources within wilderness that require additional management consideration.[364]

Keeping It Wild also directs park management to online training offered on Wilderness.net

for the management of cultural resources within wilderness. Wilderness.net provides three related

training sessions designed to provide wilderness managers with a basic understanding of the

importance of cultural resources as a wilderness characteristic. While these training sessions may

not provide more than an introduction and basic guidance, they represent the importance of

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[360] *Keeping It Wild in the National Park Service,* 90.
[361] *Keeping It Wild in the National Park Service,* 91.
[362] *Keeping It Wild in the National Park Service,* 91.
[363] *Keeping It Wild in the National Park Service,* 92.
[364] *Keeping It Wild in the National Park Service,* 92.

disseminating the importance of cultural resources in wilderness throughout park staff. For Congaree, this training should be undertaken as an important first step in park staff understanding and valuing the relationship between cultural resources and wilderness.

Appendix 4.1 of *Keeping It Wild* offers additional guidance for creating a comprehensive management plan and narrative for cultural resources and wilderness. Titled, *Principles to Foster Wilderness and Cultural Resource Integration,* Appendix 4.1 articulates the value of integrating CRM and wilderness management and the benefits that integration has for both cultural resources and wilderness. One fundamental aspect of this integration is involvement of cultural resource staff at the park or regional level in wilderness planning.

Appendix 4.1 describes several principles to improve the integration of cultural resources and wilderness. These principles emphasize the equal importance of preserving both cultural resources and wilderness and reiterate that cultural resources do not need to be mentioned in enabling legislation or wilderness designation to be part of the area's wilderness character.[365] The third principle provides additional guidance for the value of cultural resources in wilderness to visitors. It reads, "cultural resources can benefit wilderness by allowing visitors to understand and feel connected to the vital and varied relationships between people and nature."[366] Appendix 4.1 goes on to argue that the history of wilderness is in itself an important theme that needs to be considered in cultural resource and wilderness management.[367] This statement deals directly with the importance of developing a park narrative that incorporates both history and wilderness to provide visitors with a more complete understanding of an environment.

Appendix 4.1 concludes by citing the recommendations by the Advisory Council on Historic Preservation. These directions focus on developing "an approach to resource management

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[365] *Keeping It Wild in the National Park Service,* 186.
[366] *Keeping It Wild in the National Park Service,* 186.
[367] *Keeping It Wild in the National Park Service,* 186.

and conflict resolution of federally owned public lands that achieve balance between natural and cultural resources."[368] Appendix 4.1 provides a partial road map for Congaree to better incorporate cultural resource into wilderness management and the park's narrative. *Keeping It Wild* describes two parks that have recently crafted wilderness policy within the planning framework that could provide Congaree with examples of how park policy could be rewritten to better integrate cultural resources and wilderness.

Figure 11: Historic Woodward Cabin, Lake Clark National Park[369]

Keeping It Wild describes Lake Clark National Park's efforts to unite cultural and wilderness themes in its recent wilderness narrative. In 2011, Lake Clark completed a wilderness character narrative for the Lake Clark Wilderness highlighting the connection between the area's wilderness values and human history. Lake Clark National Park in Alaska easily meets the requirements of wilderness designation, but rather than focusing solely on natural characteristics and wilderness, the park also incorporated the area's strong cultural association with the Dena'ina

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[368] *Keeping It Wild in the National Park Service*, 187.
[369] Lake Clark National Park. Accessed February 15, 2014.
     http://www.nps.gov/media/photo/gallery.htm?id=8CC8CF8A-1DD8-B71C-0740112B23797B57.

people.[370] Lake Clark's efforts created a re-visioning of the idea of wilderness by building a strong narrative incorporating cultural resources and history as a fundamental value of the wilderness. The narrative begins by stating, "Lake Clark is *Kijik (qizhjeh),* a place where people gathered."[371] The document then describes the Dena'ina people's historical connection to the landscape and use of the land. Moreover, the document makes it clear that wilderness serves the responsibility of protecting those cultural resources and sharing their importance with the public. The narrative reads, "the undeveloped and untrammeled character of the Lake Clark Wilderness allows us to discover and preserve these sites and artifacts and to imagine these other worlds without the disruption of inventions of modern humans." It goes on to state that these resources will "contribute to the education and understanding" of humans' historical relationship with nature.[372]

Keeping It Wild also provides the example of Zion National Park's more specific management action in wilderness designed to balance cultural resource management and wilderness values. In 2012, Zion completed a minimum requirements analysis for the Middle Fork Taylor Creek Cabins to determine how these cultural resources within wilderness should be maintained.[373] The park recognized that the cabins were unique and significant resources providing an excellent "representation of pioneer use and habitation" of the area.[374] Rather than mark these resources as non-conforming with wilderness use, Zion recognized that these historic cabins provided an opportunity to enhance the wilderness story. The park stated, "the aspect that these cabins are no longer inhabitable and their once-modified surroundings are being reclaimed by the forces of nature supports the wilderness definition of, 'man himself is a visitor who does

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370 *Keeping It Wild in the National Park Service,* 163.
371 *Keeping It Wild in the National Park Service,* 163.
372 *Keeping It Wild in the National Park Service,* 168.
373 *Keeping It Wild in the National Park Service,* 188.
374 *Keeping It Wild in the National Park Service,* 188.

not remain,' but just on a slightly extended temporal scale."[375] Zion still clearly puts the emphasis

on the area's wilderness values, but demonstrates the importance of cultural resource stewardship

as an important aspect of understanding the wilderness.

Figure 12: Zion National Park staff rehabilitating historic cabin located in wilderness, Zion National Park[376]

The minimum requirements analysis offers three primary goals for the cabins' restoration

and maintenance. First, maintain the "historic integrity of each structure." Second, "continued use

of these unique cabins for interpretation and education… of the early 20th century human

occupation and use of the… canyons." And, third, "create media products to promote the project

as a model of appropriate cultural resource preservation in a wilderness setting."[377] In terms of the

physical preservation of the cabins, the minimum requirements analysis directs all restoration and

maintenance to be done by hand to the extent possible using local material.[378] These goals

demonstrate Zion's intention to not only care for cultural resources within wilderness, but also

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[375] *Keeping It Wild in the National Park Service*, 188.
[376] *Keeping It Wild in the National Park Service,* 88.
[377] *Keeping It Wild in the National Park Service*, 188.
[378] *Keeping It Wild in the National Park Service*, 189.

develop and share a narrative about why doing so is an important part of the wilderness story for the park.

Throughout the process of developing the minimum requirements analysis, Zion represented a high level of sensitivity to the needs of both cultural resources and wilderness values. The park, in many ways, went beyond considering the minimum requirements for stewardship of the cabins by thoughtfully developing a physical preservation plan as well as recognizing that the process they were undertaking represented a new methodology for uniting historical and wilderness narratives. A major theme throughout Zion's planning was the need to enhance the "human-to-nature connection."[379] The document reads, "the highly rustic condition and appearance of these cabins helps each visitor to establish a human-to-nature 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."[380]

The recent work by Lake Clark and Zion National Parks provides a new template for CRM in wilderness. These parks set the precedent that cultural resources are not only permitted in wilderness, they offer an opportunity to enhance the wilderness and park narrative and reach out to visitors in a new way to build a relationship with the land and its history. *Keeping It Wild* also offers a way to use environmental history to show how natural factors shaped human history as part of the continuing value of wilderness, and as a way to connect visitors to wilderness characteristics. This is a lesson Congaree should apply directly to its management policy. In particular, Congaree can apply a similar treatment of its cultural resources as part of the wilderness narrative. Congaree's cultural resources, such as the cattle mounts, offer a powerful tool in educating how the people who inhabited the area in the past lived and as unique resources also

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[379] *Keeping It Wild in the National Park Service,* 192.
[380] *Keeping It Wild in the National Park Service,* 192.

necessitate the specific resource planning demonstrated by Zion National Park. Congaree also has an opportunity to share with the public how rare environmental factors shaped unique adaptive responses from the humans who lived or worked in the Congaree floodplain. Even factors such as explaining how the end of hunting impacts ecology in the park, offers a way for Congaree to share a more complex and comprehensive view of its wilderness with the public.

Congaree can apply the direction in *Keeping It Wild* to develop specific planning and integrate cultural resources into the park's wilderness narrative. However, Congaree must also adopt an adaptive management approach to ensure that management policies are continually modified to meet changing conditions. It is also important to note that Congaree could benefit from enabling legislation and wilderness designation directly stating the importance of cultural resource to elevate CRM as a priority of park planning. The examples of Death Valley and Mesa Verde National Parks demonstrate how such a change could better unsure cultural resources are considered at all levels of planning and play an important role in the wilderness narrative. House Resolution 2580 proposed changing the enabling legislation to include cultural resources, but has not adopted. Although Congaree cannot directly lobby congress to make this change, park policy should encourage public involvement and education that could result in a change to the park's enabling legislation.

Site-Specific Environmental History

To implement specific resource planning, integrate human history and wilderness values into a park narrative, or support modified enabling legislation, Congaree needs a comprehensive understanding of how cultural and natural features in the park relate to one another. One methodology for achieving a synthesized understanding of the interaction of culture and nature is

environmental history. Environmental history explores the interconnections of human action and natural features and phenomena to provide an understanding of the past. When applied to management, environmental history offers a comprehensive understanding of a resource's cultural and natural aspects. As mentioned in the literature review, Mark Fiege discusses the potential of environmental history as way to improve management decisions. Fiege argues that environmental history offers an opportunity to unite cultural and natural resource information with land management by considering all of the factors that impact a particular resource or landscape.[381] Fiege also notes that to make "informed management decisions," parks need to consider the "historic processes and connections and how they affected park landscapes and their sustainability."[382] Fiege applies environmental history broadly in his article, but for park management purposes environmental history can be generally widely applied to craft a comprehensive park narrative. Or, could be applied to sites and resources as a way to craft management policy that is specific to a particular resource.

Congaree is beginning to consider environmental history in order to better understanding some park resources. In the 2004 Resource Management Plan, environmental history is used as an analytic tool in the discussion of cultural resources in the park as evidence of "environmental adaptation."[383] The 2004 RMP improves upon earlier planning documents by integrating historic and natural narratives in the park. However, what remains is to integrate that understanding with management action and the narrative that is shared with the public.

Environmental history can be applied to management at Congaree in two basic ways. The first method, similar to the Zion National Park case study, focuses on individual sites or situations. This sort of site-specific environmental history could be applied to Congaree's cattle mounts and

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[381] Feige, 17.
[382] Fiege, 16.
[383] *Resource Management Plan 2004*, 46.

dikes. As unique historic features, they are also inherently part of the environment. Using environmental history to unite the human and natural aspects of the cattle mounts and dikes provides an opportunity to better understand and care for the resources.

The second method, similar to the Lake Clark National Park case study, focuses on developing a holistic wilderness and park narrative. Because Congaree is almost entirely wilderness, its wilderness narrative is its park narrative. Environmental history provides Congaree an opportunity to talk about wilderness as a place with a human history and a place where the absence of humans as a part of the environment continues to affects the natural systems. One park story that unites human activity and natural processes is the growth of wild pig and white tail deer populations since the end of hunting in the area following Congaree's creation.

Congaree National Park fits the case study examples of western parks provided in this section because in many ways it is more similar in management problems to Western parks than to Eastern parks. Congaree possesses incredible and unique natural resources, and its environment made it a location where known human settlement was minimal. However, like the Western parks noted in this section, Congaree has both cultural and natural resources as well as wilderness values which park management must find a way to balance. By using environmental history to develop an understanding of the landscape as a whole, Congaree can shape CRM policy that respects wilderness. Likewise, environmental history can incorporate both wilderness values and human history to produce a unique wilderness narrative that tells the landscapes whole story. It is essential that throughout this process Congaree maintain an adaptive management approach that is continually re-evaluating and redesigning its management decisions. In this way, Congaree can truly meet its legislative and policy duties to provide for the public use and protect its resources, both cultural and natural, for the enjoyment of future generations.

Summary of Recommendations

      This section's recommendations focus how Congaree National Park can better integrate cultural and wilderness themes into a single park narrative. Congaree's management history consists largely of policy focused on wilderness and natural resource and the separation of cultural and wilderness themes. Congaree needs to correct that past tendency by emphasizing specific resource planning that uses environmental history to unite cultural and wilderness values. Congaree should provide the public with an understanding of how human history contributed to the environment's current form, and how the environment affected human history in the area. To succeed in these management goals, Congaree must adopt an adaptive management approach and commit to the continual monitoring of resources and reevaluation of park policy to ensure the park provides informed management policy that meets changing condition. As part of this approach Congaree must also improve communication within the park, with visitors, and with other parks that face similar challenges.

      Since Congaree exists within the context of the National Park System, it is important for this thesis also provide recommendations applicable to NPS-wide policy. The NPS needs to provide more comprehensive guidance for the management of cultural resources in wilderness, with specific reference to how cultural resources should be managed and interpreted as features that enhance wilderness characteristics. The NPS also should guide parks to incorporate environmental history as an important method to meet that management goal. The information provided in *Keeping It Wild* marks an important integration of cultural resource and wilderness management. Furthermore, the NPS must foster better communication and exchange of knowledge and staff between park units. Although each National Park faces unique challenges, when a park, such as Lake Clark or Zion, develops a successful management approach it should be shared and

recommended to other park units. Finally, the NPS must carry out an adaptive management approach on a national scale in which individual park projects are continually monitored, reevaluated, and shared with other parks.

<div align="center">Conclusion</div>

Congaree National Park's inability to incorporate cultural resources and wilderness management grew from fundamental aspects of national legislation and NPS-wide policy. The ambiguity of national legislation and NPS-wide policy creates a situation in which parks are provided with a management framework, but ultimately make management decisions at the park-level for park-specific resources. However, national legislation is not the only factor in determining the management framework, there are a variety of factors that determine decision-making at the park level. This thesis does not explore factors beyond legislation and policy, but factors such as park funding levels, experience and background of park management, and local politics among many others issues, also impact how park's manage and interpret their resources. However, an analysis of Congaree's planning documents demonstrates the progression of park policy toward a more favorable view of cultural resources management and integration of history into the park's narrative. This transformation also illustrates the evolution taking place in the NPS as a whole during this period as park service became more focused on resource protection and began considering ways to balance cultural, natural, and wilderness management. The progression of Congaree and the NPS also reflects the wider social dialogue related to the purpose of the national park system.

The progression at Congaree shows park management's ability to interpret legislation and NPS-wide policy to craft a management approach that meets the needs of a park's specific

resources. The vagueness of legislation and NPS-wide policy allows some flexibility in planning at the park level, but is also restricts activity within wilderness. Because Congaree is largely wilderness, it also faces the challenge of integrating history and CRM into wilderness management. The Wilderness Act and court decisions related to wilderness management tend to limit of CRM programs in wilderness. However, as the examples of Lake Clark and Zion National Park show, a comprehensive approach to managing resources, rather than an approach that separates resources into cultural or natural categories, provides an opportunity for Congaree to offer visitors another way to connect with wilderness values that also considers human history. A comprehensive approach to resource management is also valuable because it puts cultural resources into an important natural context, without which their interpretation would be incomplete. This is a critical aspect for Congaree because the park's unique cultural resources are the result of human adaptation to a distinctive and challenging environment.

Congaree's past management policy has generally failed to incorporate cultural resources into the idea of wilderness at the park. This policy also tended to omit specific management direction for both cultural resources and wilderness. By applying environmental history to specific sites, Congaree can build a comprehensive understanding of the relationship between cultural resources and wilderness values. With this understanding established, the park can then apply that information to policy and offer specific guidance for particular resources. It will also allow the park to build a comprehensive wilderness and park narrative to share with the public.

Further research is required to apply the management concepts discussed in this thesis to Congaree's cultural resources found in wilderness. This thesis describes the importance of information-based decision-making and continual monitoring of resources as a key aspect of management policy. However, the historical research and archeological must begin in a

comprehensive way before this approach can be fully effective. Additional research and planning will also help develop the interpretive approach and public outreach needed to communicate an understanding of the relationship between Congaree's human history and wilderness characteristics. Finally, additional research is needed to understand other factors that shaped Congaree's management and to update the park's administrative history. This thesis focuses narrowly on the progression of the park's management policy and does not provide a comprehensive update to the park's 1991 administrative history.

Congaree National Park is responsible for preserving its cultural, natural, and wilderness resources. Management policy based on an understanding that cultural, natural, and wilderness resources and values are interrelated will help Congaree better meet its requirements to uphold the NPS Organic Act, Wilderness Act, and cultural resource laws. The park's two most central duties, preservation of park resources and providing for the public use, will be best met through management policy that is continually monitored and reevaluated to ensure that the best possible management action is taken. Furthermore, through using environmental history Congaree will be able to unite cultural and wilderness themes to produce a comprehensive management approach and then share the relationship between history and wilderness with the public. In this way, Congaree National Park can both protect and share park resources and provide an example to other National Parks of the value of integrating culture and wilderness values in management policy.

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