Perspectives in Identification and Evaluation of Cultural Resources
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First, two disclaimers: The term "cultural resources" includes many kinds of places exhibiting a whole range of values, historical associations and significance among them. This paper focuses on historical values of only two types of cultural resources – terrestrial archaeological sites and the built environment – buildings, structures, and districts. Other papers for this workshop will address landscapes, traditional cultural places, and underwater archaeology.

Even this effort to minimize overlap between this paper and others runs immediately into complex issues, of course. Many archaeological sites, for example, have traditional cultural values for descendant communities; although I will focus on the scientific, information-oriented values of archaeological sites in this paper, the importance of traditional values has to be factored into all management decisions about archaeological sites, including decisions about identifying and evaluating them.

Another unavoidable overlap occurs between the discussions of identifying and evaluating built environment resources in this paper and the paper for the workshop addressing recent history issues. The single greatest cultural resource management challenge for the military today, in terms of the built environment, is the need for some rational, defensible approach to evaluating the historical significance of "recent past" properties and categorizing them for management.

The second disclaimer is that the term "cultural resource management" includes many things in addition to compliance with Section 106 of the National Historic Preservation Act (NHPA). Because the workshop is organized around the core concepts of Section 106 compliance, this paper, too, will focus on Section 106 issues. But some of the issues and recommendations have implications for the broader sphere of cultural resource management, and I will touch on those implications as well.

Introduction and Background

Like all Federal agencies, Department of Defense (DoD) installations are required by Federal law and regulations to carry out proactive management of historic properties under their jurisdiction and to complete reactive consideration of the effects of their actions on historic properties under their jurisdiction and beyond their perimeters. DoD installations are further bound by Executive Orders and memoranda and by DoD and service-specific directives and policies.

Compliance with the National Environmental Policy Act (NEPA) and with Section 106 of the NHPA requires that installations assess the nature of any effects on historic

properties and, in the case of NEPA, many other aspects of the environment as well. Since the definition of a "historic property" is a place listed in or eligible for listing in the National Register of Historic Places, the critical first step in complying with these laws is to identify historic places that may meet the criteria for National Register eligibility, and to evaluate them to determine whether they are, in fact, eligible.

In this paper I have been asked to:

- discuss current approaches to identifying and evaluating the eligibility of terrestrial archaeological sites and the "built environment," that is, historic buildings, structures, and districts
- describe some of the management challenges in identifying and evaluating these kinds of historic places, and
- suggest some possible innovations for meeting those challenges

. . . in twenty minutes. Bring the warp drive on line, Mr. Scott.

Identifying Historic Places

In talking about the Section 106 process, I use the term "historic places" to distinguish "old stuff" from "historic properties," which are old stuff that has been evaluated and found to be eligible to the National Register. Identification of historic places is probably the most straight-forward aspect of Section 106. There are standard methods for finding and recording archaeological sites through pedestrian survey, for using historical records to locate buildings and structures of appropriate age, and for "reading" and recording historical buildings and structures. In addition, there are clear standards for professional qualifications for those doing the researching, finding, and recording.

Challenges

The biggest challenge for *identification* of archaeological sites (other than dealing with archaeologists squabbling over appropriate spacing of shovel-test pits) has to do with locating deeply buried sites. How do we know where to look for sites that have no surface (in the West) or near-surface (in the East) expression?

The biggest challenge for *identification* of built-environment properties has to do with the so-called "50-year rule." Identification efforts that routinely screen out all buildings and structures less than 50 years old run the risk of allowing damage to or destruction of properties that have already achieved significance. This may be especially of concern for military installations, given the often central role that our armed forces play in the political history of the U.S. On the other hand, it is impractical to examine in detail the potential historical associations of every modern building and structure within the area of potential effects for every undertaking on most installations.

Potential Solutions and Broader Implications

Like most of the solutions that I am going to suggest in this paper, the solutions to these case-specific problems – locating deeply buried archaeological sites and identifying buildings and structures that might meet the "exceptional significance" standard – are programmatic rather than case-by-case in nature. Although programmatic solutions require greater up-front investment, they pay off in the long run through expedited compliance and better stewardship.

As an archaeological philosopher once said, "If you want to find old sites, you have to look in old dirt." A targeted, well-designed geomorphological study to determine the age of key soil units within an installation can enable managers to determine where deep testing should be included as part of Section 106 identification of archaeological sites. This decision is based on both the depth of the deposits of appropriate age and the anticipated depth of disturbance from the proposed undertaking.

Although geomorphological studies can be carried out on an undertaking-by-undertaking basis, it is more cost-effective to do this work at a larger scale, and information from larger-scaled studies can be used for both planning and NEPA compliance. Studies can be carried out on an installation-wide basis or restricted to areas slated for or likely to be considered for development, although changing installations missions can alter these designations very quickly. Geomorphic information can be used to direct activities toward or away from areas with high potential or low potential for buried sites. This information can also be used to evaluate NEPA impacts and alternatives for their relative potential to affect archaeological sites in general as well as sites of different ages and levels of integrity.

The issue of built environment properties that meet the standard for "exceptional significance," like that of buried archaeological sites, can be addressed case by case, but is much more efficiently and cost-effectively addressed on a larger scale. A installation-wide study to identify major events, patterns of events, and significant individuals associated with the installation's mission over the past 50 years should be relatively straight-forward to complete and even simpler to update on a periodic basis – in conjunction with five-year ICRMP revisions, for example. Such studies should address in general terms the likelihood that buildings or structures may exist on the installation that have an important association with these events or individuals.

With this background information, the question as to whether any given Section 106 undertaking is likely to affect recent buildings or structures meeting the standard of "exceptional historic significance" can be addressed quickly and simply. Beyond individual Section 106 undertakings, however, this type of study (if it is faithfully updated) can be used for all sorts of long-range planning involving facilities. It can help to avoid the costly and contentious situation where a significant recent building or structure is identified as such in the NEPA process, long after general plans have been developed that would lead to the building or structure being revamped or demolished.

And, as addressed in the next section, such studies of recent-past events and associations will greatly simplify identification and eligibility decisions as these properties cross the 50-year threshold in the future.

One other, less tangible benefit of ongoing studies of an installation's association with significant events and individuals is that such studies reflect and acknowledge the ongoing role of the installation and its people in history. We tend to forget sometimes that for those who make history and those who survive history, the places associated with their experience can be very important. And very worth preserving.

Evaluating Historic Places

If identifying archaeological and built-environment historic places is one of the most straight-forward aspect of Section 106 compliance, evaluating their significance in terms of the criteria of eligibility and qualities of integrity for the National Register is perhaps the least straight-forward. Issues of eligibility and integrity are more subjective, and the "costs" of being wrong in either direction (deciding that something is eligible when it isn't or that it is not eligible when it is) can be very high – one being costs in money and time, the other being the cost of irreparably lost heritage.

Challenges – Built Environment

For the built environment, two of the most problematic issues for determinations of eligibility are:
- assessing the significance of the recent-past properties – especially those that are very common property types, and
- assessing the significance of buildings or structures that have a long history but have been continually modified and upgraded

These issues are not, of course, unique to military facilities, but both are especially problematic because of the large military build-ups associated with World War II, Korea, the Cold War, and Vietnam. There is no question but that these are extremely important themes in American history. The problem is that there are so *many* districts, buildings, and structures associated with these eras and so many of them are very modest in nature or badly deteriorated or substantially altered or all of the above. How do we determine whether an individual property has an important association with World War II or the Cold War?

The second problem arises because things change in the military, frequently and radically. New weapons systems, new technologies, new missions, new tenant organizations – all of these lead to frequent revamping, remodeling, retrofitting, and demolition. How do we assess the integrity of a district, for example, that has served as an aircraft maintenance facility since World War I, but started out with JN4D "Jenny" trainers, morphed into a P-51 Mustang facility in 1944, was fitted out for F-86 Sabres during the Korean conflicts, serviced F-4 Phantoms during Vietnam, and now has been mothballed but may be refitted for Predator drones. It is an aircraft maintenance facility

with an extraordinary history, but it hasn't got a shred of "historic fabric" left from WWI and almost none from WWII.

Potential Solutions and Broader Implications

The first challenge – large numbers of similar, modest, potentially redundant properties can only be addressed efficiently at a broad, programmatic level. The initial need is for a general sense of what the inventory comprises. We need to know what the property types are, what the rare or especially significant properties are, and what are the common properties. Preferably we need to know this at the Big Picture scale as well as at the regional and installation-specific scales. And what next? Although I am not, as you will learn in a moment, a big fan of "historic contexts" as a cure all for problems with evaluating historic properties, if there has ever been a case where "develop a good historic context" was the correct answer, this is it.

A "good" historic context, however, is one that makes specific recommendations about specific qualities of specific property types. For example, which types (and in some cases, which individual properties) are most important (that is, have the strongest association with the major themes of the context)? How do we identify the best examples? What kinds of integrity issues are important for each type? Can we develop an approach that preserves a representative sample from a very common property type? What is an appropriate treatment for those properties not included in the sample? A "good" historic context is one that doesn't just tell you a bunch of interesting stuff about the Cold War but actually provides concrete guidance on how to evaluate and manage Cold War properties.

The second challenge – properties with a long history and many reincarnations – brings us to one of those areas where creativity in the application of National Register concepts is important. The most important "character-defining feature" of some kinds of structures or buildings or districts is their function, and in order to continue carrying out their historical function, they have to be constantly upgraded. This is true of many technological properties – irrigation systems, roads, pipelines, powerlines, for example – and it makes them difficult to assess using traditional historic preservation concepts like "historic fabric." The fictional aircraft maintenance facility used as an example above has been in the same location, in a military "setting," fulfilling the same mission for nearly 100 years. Does the lack of integrity of materials and workmanship disqualify it? How do we recognize the significant continuity of function in National Register terms? Can we stretch the concept of "integrity of design" to recognize function? How do we think about "period of significance" for a property such as this?

The challenge of large numbers of recent-past properties is not going to go away – like Baby Boomers going over that cliff marked "60," new properties cross the 50-year threshold every day. By adopting programmatic, context-defined approaches to evaluation, and by building an ongoing history of the installation's association with significant events and individuals, cultural resource managers can plan for that future flood of potential historic properties rather than being swept along by it.

Challenges – the Archaeological Record

For Section 106 purposes, archaeological sites are generally evaluated under eligibility criterion D, places that "have yielded, or may be likely to yield, information important in prehistory or history." National Register Bulletin 15 tells us that

> Information is considered "important" when it is shown to have a significant bearing on a research design that addresses such areas as: 1) current data gaps or alternative theories that challenge existing ones or 2) priority areas identified under a State or Federal agency management plan. (NR Bulletin 15:21)

The problem is that this concept of "important" information is incompatible with both the nature of the archaeological record and the temporal dimension of archaeological research.

There is no *unimportant* or *important* information in archaeology; there is just information. Every isolated artifact, every tiny site, every enormous site contains pieces of the total record of the past. Some sites contain many pieces, some very few. But no pieces are intrinsically important while others are not; they are all pieces of the same thing. Envision a library. There are huge thick books and tiny thin books; there are books about famous people and infamous people; there are books about World War II and the origins of the universe and tying fishing flies and sustainable agriculture and fellowship of the ring and the Russian revolution and a curious little monkey named George. No one book, large or small, is intrinsically more important than another; they are all part of the record of human thought and experience. If you've gone to the library in search of a recipe for Chicken Picatta, *The Joy of Cooking* is a far more important book than *War and Peace*. If you are seeking solace for your soul, a slender volume of Emily Dickinson may be far more important than the 34 volume collected works of Sir Winston Churchill.

The National Register process for archaeology requires that you adopt the Chicken Picatta approach (your definition of important depends on what you are looking for at the moment) when it says that the information from a particular site must "have a significant bearing on . . . such areas as *current* data gaps or alternative theories that challenge *existing* ones" [emphasis added]. This is where the analogy with a library breaks down. If we go to the library looking for Emily Dickinson, we don't then decide that Sir Winston is not important. Rather, we assume that someday we will want to know about Fortress Britain and read those stirring words, "We shall fight on the beaches, we shall fight in the fields and in the streets, we shall fight in the hills; we shall never surrender." We leave that 34 volume collected works in place to await the day that they will become "important" in the sense that we now need the information that they contain.

And this is where the National Register approach to significance of archaeological sites runs afoul of archaeology's fourth dimension – time. The data gaps and theoretical issues of today are soon replaced as a result of the technological and methodological advances of tomorrow. If we judge the NRHP eligibility of archaeological sites – that is, the

importance of the information that they contain – by today's standards and interests, the sites that don't make the cut, that are found "not eligible," don't stay in the library for future needs; they are generally lost forever.

There are two kinds of sites that make it especially problematic to use the approach that says "important information" means information that addresses current needs. The first is sites that we would classify today as not having the potential to yield "important" information. Maybe they really don't. Or maybe we just don't yet know how to access or use the information that they contain. In the late 1800s, archaeological expeditions in the upland Southwest often used roof beams out of structures in archaeological sites for firewood. And why not? It's not like they had any potential to yield important information, right? Or at least they didn't 50 years before tree-ring dating was developed.

The other problematic sites are those with information that is "redundant," given current questions and current techniques. These are classes of archaeological sites that we have studied intensively; additional data recovery at them yields diminishing returns and largely redundant data; they contain lots of information, but we don't know how to learn anything new from them. Yet.

Potential Solutions and Broader Implications

I have two suggestions. The first is this: let's be realistic about how eligibility of archaeological sites is actually assessed NOW. Because of the focus on current data gaps and theoretical perspectives, the National Register and the Secretary of the Interior's standards for archaeology and historic preservation require that eligibility to the NRHP be evaluated using developed "historic contexts," that is, discussions of important research issues grouped by place, time, and theme. Historic contexts, it is argued, enable us to define important information and thus identify NRHP-eligible archaeological sites. Virtually every theoretical discussion on the topic of making better decisions about eligibility for archaeological sites concludes that "what is needed are more and better historic contexts."

In practice, however, very few people making decisions about eligibility actually USE the historic contexts we have NOW in any meaningful way to make those decisions. What people actually do is to evaluate the physical characteristics and the morphology (the form, content, and structure) of the site and make a decision based on those. Is it largely intact or is it eroded or looted? Is it mostly buried or exposed on the surface? How many artifacts are visible? What kinds? Is there evidence of features? Structures? Are there temporal diagnostics?

When it comes to recovering archaeological data, it doesn't matter what the "historic context" is. Archaeologists gather a relatively fixed set of data from all archaeological sites: artifacts, features, structures, pollen samples, flotation samples, chronometric samples, ethnobotanical samples, perishables, faunal materials, human remains and grave goods, plus all of the provenience information for those things – maps, plans, notes, photos, drawings, etc. Some sites have all of these categories of data, others only a few.

But by looking at the physical characteristics and morphology of a site, we can assess its potential to yield those categories of archaeological data. It doesn't matter whether the site's historic context is "Pueblo II fieldhouses of the San Juan Basin" or "Early Woodland camps in the Piedmont" or "Cahokia and the American Bottom during the Moorehead Phase."

What we want to know when assessing a site's potential to yield information about the past is:

- How likely is it to yield artifacts, features, structures, pollen samples, flotation samples, chronometric samples, ethnobotanical samples, perishables, faunal materials, or human remains and grave goods?
- Are the data in this site (whatever their characteristics) in their original context and spatial relationships (that is, does the site have integrity of location and materials)?

If we want to do a better job of assessing the significance of archaeological sites relative to their information potential, what we need is not more "historic context" documents but better geomorphic data and more synthesis of existing survey and excavation data. These would enable us to more accurately to predict the information potential of a given site based on its surface expression, location, and other associations.

The second suggestion is this: let's worry less about eligibility of archaeological sites in the sense of "important information about current research issues and data gaps" sense and focus more on the significance of archaeological sites as repositories of the only physical data we are *ever* going to have about the past. Rather than divide them into "important" and "not important" based on transitory information needs and current technical skills, with the "not important" ones all being destroyed without anyone reading the book, why not divide them into significance categories and managing them accordingly? Categories might include: sites we know how to learn stuff from *now*, sites we don't know how to learn anything from *yet*, sites we've learned stuff from in the past but don't know how to learn anything new from, *yet*.

Such an approach would also enable us to address the traditional cultural values that many tribes ascribe to archaeological sites – something that National Register Criteria A, B, C, and D don't really foster unless there is specific physical evidence or specific oral traditions linking an archaeological site with specific events or persons in the past. If we were to shift our focus from eligibility to a broader category call "significance," however, we could manage for those values under NEPA and EO 13007, and potentially under a broader, more programmatic approach to Section 106 as well.

Our challenge is really to take into account both current research importance (eligibility), as required by Section 106, and the need to address the broader issue of "loss or destruction of significant scientific, cultural, or historical resources" under NEPA. By managing for significance, an installation also could address its obligations under Section 110 of NHPA by establishing a program to preserve at least a representative sample of all archaeological information within the installation for future research needs.

Conclusions

The Advisory Council's regulation says that Section 106 is a process for accommodating historic preservation concerns with the needs of Federal undertakings through consultation. A rough translation might go something like this: "Be good stewards, do what it takes to preserve the stuff that really matters, and do it in a way that facilitates the mission." Section 106 is intended to be a flexible process; the regulation contains a whole section on "program alternatives," which are customized ways to comply with the law. And programmatic, rather than case-by-case, approaches are encouraged – four of the five program alternatives establish programmatic approaches. In this paper, I have suggested both flexibility and programmatic approaches as ways to streamline compliance activities, focus on historic places that matter, and achieve a better balance of stewardship and mission needs.