

REFERENCE MANUAL 41: WILDERNESS STEWARDSHIP

Cultural Resources in Wilderness: Guidance for Considering and Managing Historic Structures and Installations

Table of Contents

Recommendation and Approval	2
Introduction	3
Cultural Resources Can Contribute to Wilderness Character	4
Identifying Cultural Resources that Contribute to Wilderness Character	5
Planning/Managing Cultural Resources to Preserve Wilderness Character	7
<i>The Necessity Determination</i>	<i>7</i>
Treatment Planning	8
<i>Treatment of “Necessary” Structures or Installations</i>	<i>9</i>
<i>Treatment of Other Structures and Installations</i>	<i>10</i>
Determining the Appropriate Type of Treatment	10
Determining the Minimum Activity in Wilderness to Accomplish the Treatment	11
Other Considerations	12
<i>Use of Historic Structures and Installations</i>	<i>12</i>
<i>Maintaining Structures for Administrative Necessity</i>	<i>12</i>
<i>New Wilderness</i>	<i>13</i>
Appendix A. Applying the Secretary of the Interior’s Standards and Other Guidance	14
Appendix B. Process for Managing Historic Structures/Installations in Wilderness	36

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Introduction

Preserving and interpreting cultural resources is a core part of the National Park Service's (NPS) mission. This is no less true in NPS-administered wilderness. Cultural resources in wilderness tell the human story of a place, illuminate the historical, cultural, social, and spiritual values embedded in wilderness landscapes, and impart important scientific information. They provide touchstones to a place's history and culture, create opportunities for discovery and learning, and enhance connections to past generations.

In wilderness, preserving and protecting cultural resources, including historic "structures"¹ and "installations"² must be addressed within the context of preserving wilderness character and integrated into a park's wilderness and cultural resources planning efforts. Historic structures and installations are common types of cultural resources³ in wilderness that can present management challenges requiring decisions which balance the value of the cultural resources with the value of an undeveloped wilderness. The Wilderness Act of 1964 (Public Law 88-577) and subsequent case law clearly establish that wilderness managers must be especially careful and deliberate when addressing historic structures and installations in wilderness. As part of this process, wilderness managers must also consider and fully comply with Sections 106 and 110 of the National Historic Preservation Act (Public Law 89-665), National Environmental Policy Act (Public Law 91-190), Archeological Resource Protection Act (Public Law 96-95), Native American Religious Freedom Act (Public Law 95-341), and other related statutes.

The purpose of this document is to outline a framework to assist parks in the interdisciplinary discussion and decision-making process when planning for and managing cultural resources in wilderness. The framework is not prescriptive because the nature and significance of cultural resources varies widely between park units, as does the wilderness character of each park. The primary intent of this guidance is to clarify when cultural resources are typically considered part of "other features of value" quality of wilderness character (e.g. "...features of scientific, educational, scenic, or historical value"), and how to balance decisions concerning the management of those resources with the mandate that parks manage for all qualities of wilderness character (including the undeveloped quality). Further, the document provides a general framework for guiding decisions on the appropriate types and levels of treatments for historic structures and installations.

Section I, "Cultural Resources Can Contribute to Wilderness Character," explains how cultural resources can contribute to wilderness character. Section II, "Identifying Cultural Resources that Contribute to Wilderness Character," provides guidance as to how to identify the cultural resources within a park that contribute to the wilderness character of the park's wilderness areas. Once those resources are identified, Section III, "Planning/Managing Cultural Resources to Preserve Wilderness Character," provides guidance as to how to determine which resources are necessary to preserve the totality of wilderness character. Section IV, "Treatment Planning," provides guidance for making decisions regarding treatment of cultural resources in wilderness. Section V, "Determining the Appropriate Type of Treatment," specifically addresses the determinations that need to be made when considering active treatment to perpetuate a historic structure or installation in wilderness. Section VI, "Determining the Minimum

¹ "Structure" – anything made by humans that is intended for human occupation, or their possessions, and is left behind when the builder leaves the wilderness (*NPS Reference Manual 41: Wilderness Stewardship* (RM41)).

² "Installation" – anything made by humans that is not intended for human occupation and is left unattended or left behind when the installer leaves the wilderness (RM41).

³ Note: The Wilderness Act prohibits structures and installations whose definitions cross-cut the categories of historic properties and cultural resource types, including "structures" - "buildings" - "objects" - "sites" - "districts" - and "cultural landscapes". Practitioners should refer to the "National Register Bulletin: How to Apply the National Register Criteria for Evaluation" and DO28 for more information.

Activity in Wilderness,” provides guidance for identifying the minimum act(s) to accomplish proposed work in wilderness and integrates this guidance document into the Minimum Requirements Analysis (MRA) framework.

Appendix A, *Applying the Secretary of the Interior’s Standards and Other Guidance*, supports this narrative guidance and provides more detailed and specific direction for physical treatments of historic structures and installations in wilderness. The administrative actions available to land managers for managing cultural resources in wilderness include documentation, preservation, rehabilitation, restoration, reconstruction⁴, mouldering, relocation, and removal.

Appendix B, *Process for Managing Historic Structures/Installations in Wilderness*, includes a flowchart.

I. Cultural Resources Can Contribute to Wilderness Character

This section provides guidance for parks on how to integrate tangible cultural resources and intangible cultural values into their understanding of their park’s wilderness character. This is a fundamental step in the process of balancing these historical values with other aspects of wilderness character, which is key to subsequent determinations of necessity (i.e., a determination that a cultural resource is necessary for the administration of an area as wilderness). It is critical that parks have a robust understanding of how cultural resources can contribute to wilderness character in order to work through this process.

Cultural resources tell the human story of a place, representing the historical, cultural, social, and spiritual values embedded in our landscapes. The term “cultural resources” is more specifically defined by federal laws and agency management policies. The National Historic Preservation Act defines “historic properties” as “...any [precontact] or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register of Historic Places.” 54 USC 300308. *NPS Management Policies (2006) Chapter 5* expands upon this definition to explain that cultural resources include “archeological resources, cultural landscapes, ethnographic resources [including sacred sites and traditional cultural properties], historic and [precontact] structures, and museum collections.” While most cultural resources easily fit within the National Register property types and meet one or more of the criteria for eligibility, some may not. Those that do not will typically include tangible precontact or historic-era resources that have social or traditional cultural importance to traditionally-associated people, local descendant families, communities or other groups; and places or features with intangible qualities. Further discussion of what cultural resources are can be found in *Director’s Order 28: Cultural Resources Management* (DO28) (1996), and in the National Register Bulletin: *How to Apply the National Register Criteria for Evaluation*. This guidance incorporates the agency definition of cultural resources.

Wilderness areas are places that are specially designated as areas where the earth and its community of life are untrammelled by humans, where people themselves are visitors who do not remain. In those places, the NPS is charged with preserving wilderness character, in addition to its management responsibilities under the Organic Act, park enabling legislation, the National Historic Preservation Act, and other applicable laws. Managing to preserve wilderness character requires managers to holistically consider the five tangible qualities of wilderness character, all equally important, which are: (1) Natural, (2) Untrammelled, (3) Undeveloped, (4) Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation, and (5) Other Features of Value. For the definition of “wilderness character,” and further explanation of these qualities, see *Keeping It Wild in the NPS* and *Keeping It Wild 2*. Together, these five qualities comprise the tangible or physical setting of the wilderness and its wilderness

⁴ The reader is referred to the Secretary of the Interior’s Standards for Treatment of Historic Properties, which includes only preservation, rehabilitation, restoration, and reconstruction.

character. “Historical use” is also specifically identified as one of the six public purposes of the Wilderness Act.

Cultural resources that contribute to wilderness character primarily fall under the other features of value quality of wilderness character, described in the Wilderness Act at Section 2(c) as “features of scientific, educational, scenic, or historical value.” These resources are part of the larger transformative message of wilderness, which is that our society has set aside wild places as part of America’s enduring heritage, some of which contain landscapes that have been anthropogenically modified or historically developed. They provide touchstones to a place’s history and culture, create opportunities for discovery and learning, and enhance our connection to past generations and ancestors.

II. Identifying Cultural Resources that Contribute to Wilderness Character

This section of the guidance provides contextual information for parks to identify the cultural resources that have historical value and contribute to the character of wilderness. Briefly stated, these are the discrete places and tangible resources that tell the human story of the wilderness. Identifying these resources is an important component of Step 1 of an MRA process.

Ideally, identifying these cultural resources occurs in a comprehensive and interdisciplinary planning effort, such as for a Wilderness Stewardship Plan (see *Keeping It Wild in the National Park Service*). The level of identification can and should vary, depending on the types of resources, from specific to programmatic. For example, archeological resources may be known to occur where inventories are complete and have the potential to occur in areas where inventories are incomplete. These can be both specifically and programmatically identified. Ethnographic resources may or may not be identified but should be generally expected where Traditionally Associated Peoples (including but not limited to Native American Indian tribes, Alaska Native and Native Hawaiian organizations, or other aboriginal groups) retain traditional ties to a wilderness area. Where known, these resources can and should be specifically documented (adhering to confidentiality considerations), and where presumed to occur, they should be generally or categorically described (DO28, Chapter 10, A.3.). Historic structures and cultural landscapes should be identified and documented with as much specificity as possible according to procedures described in DO28.

When forming an interdisciplinary team to identify wilderness cultural resources, parks should rely on a variety of expertise including, where pertinent, history, cultural landscapes, historic structures, archeology, cultural anthropology, and education, as well as natural resources and wilderness management. Knowledgeable non-agency individuals should also be consulted, in particular, historically or traditionally associated groups. Parks should take a holistic approach in identification and should not exclude resources because of concerns about how these resources may or may not be treated or managed, or what their potential impacts to other qualities of wilderness character may be. Determining whether and how resources are actively managed is a separate decision that must be made in consideration of preserving the totality of wilderness character.

Parks should rely on scholarly and scientific evidence when evaluating whether specific cultural resources contribute to wilderness character. Often landscapes, buildings, structures, sites, or objects may seem incompatible with the idea of wilderness because of materials, design, or construction that does not feel “primitive,” “primeval,” or “natural.” Often the human stories and associated historic resources represent the antithesis of wilderness; however, this does not necessarily render these resources non-contributing to wilderness character. For example, the California Desert Protection Act specifically identifies sites exemplifying the mining and ranching history of the Old West as important historical and cultural values of the California desert wilderness areas protected by that law (Pub. Law. 103-433 § 2). Parks should be

inclusive when identifying the important stories of the places that are now wilderness and determining which tangible resources convey significant history.

Parks should use the agency definition of cultural resources, as found in DO28, as a starting point for this identification effort. National Register eligibility is a good frame of reference for identifying features with historical value but is not the only method. Many sources of information are useful in evaluating whether specific cultural resources contribute to wilderness character. Some examples include:

- Park enabling legislation, which may refer to historic, precontact, or cultural sites, districts, buildings, structures, and objects to be preserved and protected⁵.
- Wilderness legislation, which may make specific note of or special provisions for cultural or historic structures, landscapes, features, or objects that should be either considered part of wilderness character or managed under special provisions.
- Wilderness eligibility assessments, which may note features of scientific, educational, scenic, or historic value, or note historic structures or cultural landscapes present in an area identified as eligible for wilderness designation if those structures or landscapes are a minor feature of the total eligible area.
- Wilderness studies, and especially the environmental compliance document prepared in support of a wilderness proposal (Environmental Assessment or Environmental Impact Statement), typically address historic and cultural resources present in an area proposed for wilderness designation.
- Wilderness Character Narrative, which is a qualitative, affirming, and holistic description of what is unique and special about a specific wilderness.
- Wilderness Character Baseline Assessment, which may identify cultural resources that are integral to wilderness.
- Park purpose, significance, and fundamental resources and values statements, which are prepared as part of park planning efforts. These statements typically note important historic and cultural themes and the features that represent them. Any cultural resources identified in park enabling legislation, and also present in wilderness, should be considered part of wilderness character and prioritized for preservation.
- Special Resource Nominations, such as World Heritage Site Nominations and National Historic Landmark Nominations, which identify cultural resources of international and national significance, respectively, and nationally significant properties determined eligible or listed on the National Register. For example, Mesa Verde National Park is designated a World Heritage Site for its extensive remains of Native American cultural traditions, some of which are protected as part of wilderness. Other parks (and associated wilderness areas) protect nationally significant buildings, landscapes, and sites that are also emblematic of wilderness values. Cultural resources in wilderness that are of international and national significance should be considered part of wilderness character and prioritized for preservation.
- Cultural Resources Baseline documents, which capture the various cultural, historic, and precontact themes and the resources that represent them. In particular, the following baseline documents will identify features of scientific, educational, scenic, and historical value in wilderness areas:
 - Historic Resource Study
 - Archeological Overview, Assessment, or Research Design

⁵ *NPS Management Policies (5.1.3.2.2 and 5.2)* state that all cultural resources within historical and cultural units that are directly connected to the legislative or executive mandate are nationally significant and NPS must apply the higher level of care set forth in 36 CFR 800.10.

- Ethnographic Overview and Assessment
- National Register Nominations
- Cultural Resource Inventory System Records:
 - Archeological Resources
 - Cultural Landscapes
 - Historic Structures
 - Ethnographic Resources
- NPS CRGIS geodatabase and Park Resource Base maps

III. Planning/Managing Cultural Resources to Preserve Wilderness Character

This section of the guidance provides information and considerations to help parks formulate decisions on how the cultural resources that contribute to wilderness character will be managed. This decision-making is complex and requires an understanding of both cultural resources and wilderness preservation responsibilities and is ideally accomplished as part of a holistic planning process including both the wilderness character narrative, wilderness character baseline assessment and the Wilderness Stewardship Plan. Key among these considerations is an informed, thoughtful, and balanced determination of whether specific structures and installations are necessary to convey the historical values of a wilderness. This decision-making is an important precursor to Step 1 of an MRA process.

Wilderness designation does not diminish the NPS’s fundamental responsibility for affirmatively managing its cultural resources. The Wilderness Act’s provisions do not lower the standards for the use or preservation of national parks under the various laws applicable to that national park including, the Organic Act of 1916, the Antiquities Act of 1906, the Historic Sites Act of 1935, the National Historic Preservation Act of 1966, and other federal legislation that applies to the protection of cultural resources. However, the NPS’s responsibilities for protection and treatment of tangible cultural resources must be carried out in a manner that preserves the totality of wilderness character.

The Wilderness Act requires agencies to preserve wilderness character. In wilderness, perpetuating physical cultural and historical resources (such as historic structures and cultural landscapes) through ongoing intervention, such as preservation maintenance, is not the primary management thrust. Rather, management emphasis shifts to one of understanding and documenting the historical and cultural values and addressing protection and treatment of tangible cultural resources in a balanced manner that preserves the totality of wilderness character. Doing so demonstrates that the benefits of the action or inaction to one or more of the five qualities of wilderness character outweigh the impacts. In particular, decisions to actively manage historic structures and installations must be justified using a “necessity determination” described below.

The “Necessity Determination”

Structures and installations are prohibited under Section 4(c) of the Wilderness Act unless they are “necessary to meet the minimum requirements for the administration of the area for the purpose of this Act.” Because the NPS has an obligation to preserve wilderness character, a structure or installation meets this necessity standard and may be retained in wilderness if its existence preserves the totality of wilderness character based on a careful balancing of the five qualities of wilderness character. When balancing these qualities, it can be helpful to consider the statutes and planning documents that were listed when identifying cultural resources that contribute to wilderness character in Section II above.

A minimum requirements analysis (MRA) is required by law in designated wilderness and by policy in the other categories of wilderness whenever park managers are considering a use prohibited by Section 4(c) of the Wilderness Act. The MRA involves a two-step process to help park managers make informed, defensible decisions.

Specifically, a park must consider the benefits and impacts of structures or installations located in wilderness to all five qualities of wilderness character:

- *Undeveloped*: This quality captures the essence of wilderness as a landscape that retains its primeval character and influence where peoples' imprint is substantially unnoticeable. Wilderness is contrasted with areas where humans and their influence dominate the landscape. Wilderness provides a sense of humility, restraint, and interdependence that inspires human connection with nature. Consider the visual prominence, congruence with natural surroundings, density, cumulative impact, and volume of structures and installations in wilderness.
- *Outstanding opportunities for solitude or primitive/unconfined recreation*: This quality highlights the outstanding opportunities for recreation in a wilderness environment that is relatively free from the encumbrances of modern society, and for the experience of the benefits and inspiration derived from self-reliance, self-discovery, physical and mental challenge, and freedom from societal obligations. Consider opportunities for and impacts on solitude and self-reliant recreation.
- *Natural*: This quality focuses on ecological systems that are substantially free from the effects of modern civilization. Consider the impacts and benefits to natural resources in wilderness from the immediate presence of the structures or installations.
- *Untrammeled*: This quality underscores the value of a wilderness as essentially unhindered and free from the intentional actions of modern human control or manipulation. Consider whether structures and installations within wilderness deliberately manipulate the biophysical environment. This is likely to be rare. Examples could include dams that affect natural hydrologic processes.
- *Other features of historical value*.⁶ This quality corresponds with the historic value identified in Section II of this Guidance and captures important elements or "features" of a particular wilderness that are not covered by the other four qualities. Typically, these occur in a specific location, such as archaeological, cultural, or historical features; some, however, may occur over a broad area such as an extensive cultural landscape. Consider the historical value of the structures and installations, and their ability to convey the important stories of the wilderness in which they are located.

After considering and balancing the benefits and impacts, park managers may find that a structure or installation that contributes to wilderness character under Section II above is not necessary under this Section because its negative impacts outweigh its positive contribution to wilderness character. Or you may find that its positive contributions outweigh its negative impacts to wilderness character and thus that the structure does meet the standard in Section 4(c) of the Wilderness Act and may choose to retain it.

Parks should document their findings of necessity and decision-making process that led to these findings. In particular, parks should explain the reasoning behind their decision and how the above factors were balanced in order to arrive at the decision.

IV. Treatment Planning

This section of the guidance provides information to help parks determine the most appropriate treatment strategy or approach for cultural resources in wilderness. These strategies include three types of approaches: active perpetuation, mouldering, and removal. While these apply to all cultural resources,

⁶ Also included within the other features of value quality of wilderness are features of scientific, educational, and scenic value. These values are beyond the scope of this guidance document.

these treatment strategies are particularly important for historic structures and installations that parks have determined “necessary” in Section III above. This treatment decision-making is another important component of Step 1 of an MRA process.

Treatments for cultural resources in wilderness should be consistent with the *Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation*, *Secretary of the Interior’s Standards for the Treatment of Historic Properties*, and *NPS Management Policies (2006) Chapter 5*. Documentation and evaluation are the essential first actions for wilderness cultural resources, regardless as to whether they are determined necessary to retain in wilderness, since many will disappear over time without active management.

Treatment of “Necessary” Structures or Installations

For those structures and installations determined necessary to convey historic values in wilderness, parks should use their comprehensive and interdisciplinary planning effort to identify the appropriate long-term treatment strategy. Either active perpetuation or allowing these structures and installations to molder in place are appropriate treatments. However, while molder in place is a potential treatment for structures and installations in wilderness, it is not a treatment consistent with the Secretary of the Interior’s Standards for Historic Properties. If molder in place is the selected wilderness treatment, this will generate an adverse effect on historic properties, requiring park managers to address 36 CFR 800.6.

When deciding among appropriate treatments, a park should consider its cultural or historic value and ability to convey the historical values of the wilderness. World Heritage resources, National Historic Landmark resources, nationally significant historic properties, resources specifically identified in park enabling legislation or legislation designating wilderness, and resources identified by Traditionally Associated Peoples, have, by definition, an elevated status and should be prioritized for active perpetuation⁷. As conditions change, parks should consider whether a structure or installation intended for active perpetuation should instead be allowed to molder, or alternatively, those intended for mouldering should instead be actively perpetuated.

A park must consider the feasibility and extent of measures likely needed to actively perpetuate a resource in balance with preservation of the totality of wilderness character. The extent and magnitude of impacts to the undeveloped and other qualities of wilderness character required for active perpetuation should be balanced with the significance of the cultural resource and the contribution it makes to wilderness character. If active perpetuation involves extensive or regular and re-occurring wilderness character impacts, active perpetuation may not be the appropriate decision. Conversely, active perpetuation may require limited intervention with minor impacts, and consequently preserve wilderness character.

⁷ “Active perpetuation” is defined as any one of the four treatments described in the Secretary of the Interior’s Standards for Treatment of Historic Properties: Preservation, Rehabilitation, Restoration, or Reconstruction (1995; rev. 2017). Active perpetuation is specifically distinguished from mouldering or removal, as these both constitute Adverse Effects to historic properties (36 CFR 800.5). Preservation activities will usually be the most common treatment proposed in wilderness, while Restoration and Rehabilitation will be rare, and Reconstruction almost never appropriate.

The decision to actively perpetuate a structure or installation should include an explanation as to why active perpetuation is necessary when compared to other courses of action not prohibited in Section 4(c) of the Wilderness Act. Specifically, it should explain why documentation alone, mouldering, removal or relocation outside of wilderness are insufficient to meet the park's preservation goals. As conditions change, parks should consider whether a structure or installation intended for active perpetuation should instead be allowed to molder, or alternatively, those intended for mouldering should instead be actively preserved. Structures and installations not intended for active perpetuation may be allowed to molder, pending resolution of 36 CFR 800.6.

Treatment of Other Structures and Installations

Parks should also use the comprehensive and interdisciplinary planning effort to identify the appropriate treatment for those structures and installations that have historical value but are not determined necessary to preserve the historic values of the wilderness area. For these structures and installations, either mouldering or removal are appropriate treatments⁸.

Mouldering is appropriate for structures or installations that continue to convey their historical value and do not pose unacceptable impacts to the totality of wilderness character. Mouldering may be appropriate for historic structures and installations that are a minor feature of the wilderness area or are not causing systemic or otherwise unacceptable impacts to wilderness character. Removal may be appropriate when structures or installations, on the whole, damage wilderness character and removing them is feasible and will result in a net benefit to wilderness character.

In addition to making the documented findings referenced above, parks should document their treatment decision-making, explaining the reasoning behind their decision, and how the above factors were balanced in order to arrive at the decision.

V. Determining the Appropriate Type of Treatment

This section offers guidance for parks to use in determining which type of active treatment (preservation, restoration, rehabilitation, or reconstruction) is most appropriate to ensure cultural resources continue to exist, usually through active preservation treatment. This decision-making is also an important component of Step 1 of an MRA process.

To reiterate, when considering an action within wilderness that would actively perpetuate a structure or installation, a park must first make a determination that maintaining the structure is the minimum requirement for preserving the wilderness's historic values (see Section IV above). This determination rests on a finding that the structure or installation under consideration preserves the totality of wilderness character, based on a careful balancing of the five qualities of wilderness character. The park must also determine, and document in writing, that the structure or installation is appropriate for active perpetuation in wilderness.

⁸ Mouldering or removal do not meet the Secretary of Interior's Historic Preservation Treatment Standards and will result in neglect, which is defined as an adverse effect in the National Historic Preservation Act's Section 106 regulations, 36 CFR Part 800. Adverse effects must be resolved through avoidance, minimization or mitigation by an MOA or PA with the park's SHPO. The Advisory Council for Historic Preservation must be invited to participate in the resolution of an adverse effect.

If the park has already completed a comprehensive and interdisciplinary planning effort as discussed above, such as a Wilderness Stewardship Plan or a Cultural Resources Management Plan, determined the structure or installation to be necessary to preserve wilderness character, and found that it is appropriate for active perpetuation, then these decisions should be referenced or otherwise incorporated into a decision document, such as an MRA, with respect to any active treatment. If the park has not yet completed a comprehensive and interdisciplinary planning effort, the park must make these determinations by using the guidelines described in Section IV above before considering what type of treatment to undertake.

Documenting this decision should include an explanation as to why active perpetuation is necessary when compared to other courses of action not prohibited in Section 4(c) of the Wilderness Act. Specifically, it should explain why documentation alone, mouldering, removal, or relocation outside of wilderness are insufficient to meet the park's preservation goals.

MRA Process

MRA Step 2: Determine the minimum activity:

- A. Describe alternatives
- B. Compare alternatives

Decision: What is the minimum activity (method or tool)?

When selecting the appropriate type of treatment, *NPS Management Policies (2006)* directs parks to consider the full range of treatments under the "[Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings](#)" and the "Guidelines for the Treatment of Cultural Landscapes" (see also Appendix A). In general, the Standards are a series of concepts about maintaining, repairing, and replacing-in kind historic materials, as well as designing compatible additions or alterations. The Guidelines offer general design and technical recommendations to assist in applying the Standards to a specific property. Together, they provide a framework and guidance for decision-making about work or changes to a historic property.

Parks should carefully consider the historical values of the structure or installation, the totality of wilderness character, and feasibility when determining the most appropriate treatment. These treatments range in scale and intensity of intervention, from Preservation on the least invasive end to Reconstruction on the most invasive end. Generally, preservation of existing infrastructure will be the most common treatment. However, there may be times when a structure would require significant rehabilitation or repair in order for it to continue to convey its historic significance and values. Rehabilitation allows for compatible alterations that retain character-defining features but allow for an adaptive use that would require less frequent interventions in the future. Reconstruction should rarely, if ever be considered (See *Appendix a, Historic Resources in Wilderness: Applying the Secretary of the Interior's Standards and Other Guidance*). As with any treatment, parks must carefully select, justify, and document treatments that are protective of the totality of wilderness character.

This part of the decision-making process represents the end of Step 1 of an MRA process.

VI. Determining the Minimum Activity in Wilderness to Accomplish the Treatment

This section of the guidance provides specific direction for Step 2 of an MRA process, determining the minimum activity necessary to implement an administrative action in wilderness determined necessary during Step 1 of an MRA process. (See Sections III-VI above). This is often referred to as the "minimum tool" or "minimum activity" analysis.

Once a park has selected an appropriate active treatment, the park must identify the minimum activity to accomplish that treatment. The park should describe the specific action or project in detail, explain why

that work or project is the minimum necessary to accomplish the active treatment, choose the tools and practices that best preserve wilderness character, and document those decisions. The park should weigh the impacts to wilderness character of different alternatives for accomplishing the project and adopt the alternative with the least impact to wilderness character. As in other instances, helicopter landings are especially controversial. If there is insufficient information available during the planning process about how the specific work would be conducted, Step 2 of an MRA process can be postponed until closer to the time that action is going to take place when the park has compiled sufficient information. Parks should always include a no-action alternative in Step 2 of their MRA process, which provides an opportunity to reconsider whether the identified activities are necessary to preserve wilderness character.

When appropriate to the cultural resource, parks should prioritize using primitive tools and traditional construction methods and materials in implementing treatments for historic structures and installations. Doing so is not only a “best practice” when working with historic structures and cultural landscapes, but also provides an important opportunity to retain and pass along traditional knowledge and skills, including the traditional knowledge of Traditionally Associated People and traditional ecological knowledge.

Parks should document their minimum activity decision-making, explaining the reasoning behind their decision, and why the “no action” alternative does not meet the park’s need to preserve the totality of wilderness character. This concludes Step 2 of an MRA process.

VII. Other Considerations

This section of the guidance addresses other issues that may arise when planning for or managing structures and installations in wilderness or that should be considered when designating new wilderness.

Use of Historic Structures and Installations

Providing for occupancy or use of a historic structure or installation is a well-accepted means of justifying a building’s or structure’s preservation and ensuring its perpetuation. Prioritizing continued use of a historic property is a requirement for federal agencies in Section 110 of the National Historic Preservation Act. However, the decision to maintain a historic structure in wilderness must be based on a finding of the structure’s necessity, independent of how people might use it. Once the decision to retain the structure is made as discussed above, any uses of the structure must be appropriate and in keeping with wilderness character as well as compatible with the significance and integrity of the cultural resource. Because of potential effects on other aspects of wilderness character, parks should be especially careful in authorizing long-term occupancy.

Maintaining Structures for Administrative Necessity

Structures retained in wilderness must be necessary either for historic preservation purposes, as discussed above, or for an administrative purpose. Structures and installations may be maintained in wilderness if they are necessary for the park’s administration of the wilderness area. A structure should not be retained merely because it has some historic value and is convenient, but not necessary, for administration. The park should rely on current administrative needs, not speculative future needs. Like the analysis of historic structures in wilderness, the park must explain why retaining the structure is necessary, why alternative management options are not viable, and why the impacts on wilderness character are acceptable. In cases of documented administrative need, parks will prioritize retaining historic structures and installations over new construction (see *NPS Management Policies (2006), Section 5.3.5.4.6.*).

New Wilderness

When conducting eligibility assessments or wilderness studies, parks should consider explicitly referencing any historic structures or installations that the park has determined are necessary to retain and actively treat in order to preserve wilderness character. Parks should also consider requesting that any proposed legislation reference such structures or installations or consider requesting that any proposed legislation include language that would authorize the park to determine which structures to retain within wilderness in future management plans.

Appendix A. Applying the Secretary of the Interior’s Standards and Other Guidance in Wilderness

This appendix provides guidance for documentation and treatment of cultural resources in wilderness. Its primary intent is to clarify how the [*Secretary of the Interior’s Standards and Guidelines: Archaeology and Historic Preservation*](#), [*Secretary of the Interior’s Standards for the Treatment of Historic Properties*](#), and the [*Secretary’s Standards and Guidelines for Federal Agency Historic Preservation Programs*](#) (collectively referred to as “Standards” throughout this document) should be applied when working with historic buildings and structures in wilderness. Where relevant, this appendix also addresses other cultural resource types, including historic and archeological sites and landscapes. It goes beyond the documentation and treatments identified in the Standards by including other wilderness-appropriate strategies that are not addressed in the Treatment Standards.

This appendix is arranged to provide specific language from [*NPS Management Policies \(2006\)*](#) (Chapter 6: Wilderness Preservation and Management and Chapter 5: Cultural Resources Management) and the Standards paired side by side with the considerations, caveats and limitations that apply in wilderness. It contains wilderness-specific commentary and considerations on documentation, preservation, restoration, rehabilitation, and reconstruction from the Standards for the Treatment of Historic Properties. Information and guidance on relocation, mouldering, demolition, and removal, from the Standards for Federal Preservation Programs is also provided. The Treatment Standards do not preclude relocation, mouldering and demolition, which may be implemented to support management decisions to preserve the totality of wilderness character. Each section begins with the policy guidance and decision-making considerations, followed by detailed guidance from the Standards paired with wilderness-appropriate interpretations.

Working with cultural resources in wilderness is a challenging endeavor, requiring understanding and careful consideration of statutes, regulations, and policies. Most management actions in wilderness require strong interdisciplinary collaboration to balance historic preservation goals with preservation of wilderness character in its totality. This is especially important when planning and implementing any treatment of historic buildings and structures and/or when considering occupancy or adaptive use of a historic building or structure. This appendix is intended to support the interdisciplinary discussions and decision-making necessary to arrive at a successful project. It should be used in concert with other park planning documents including, but not limited to, a general management plan, foundation document, wilderness stewardship plan, resources stewardship strategy, and cultural resources management plan.

Parks are cautioned to avoid additional or ancillary prohibited uses that may accompany occupation or use unless they are the minimum necessary for the administration of the area as wilderness. These include, but are not limited to, motorized equipment, mechanized transport, electrical systems, and outdoor lighting. Parks are advised to pay careful attention to the minimum requirements analysis, as well as regulatory compliance with the National Environmental Policy Act and Section 106 of the National Historic Preservation Act, for all activities in wilderness but especially those involving prohibited uses.

References

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<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p>DOCUMENTATION</p> <p>The act or process of inventory, identification, evaluation, and recording of the historic, archeological, architectural, and/or cultural value(s) of a property.</p>	
<p><i>Management Policies</i></p> <p><i>Section 6.3.6 Scientific Activities in Wilderness:</i></p> <p>The statutory purposes of wilderness include scientific activities, and these activities are encouraged and permitted when consistent with the Service's responsibilities to preserve and manage wilderness. See 6.3.6.1 for more detail.</p> <p><i>Section 6.3.8 Cultural Resources:</i></p> <p>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... The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance (including documentation).</p> <p><i>Section 5.1.3 Identification and Evaluation of Resources:</i></p> <p>The NPS will conduct surveys to identify and evaluate the cultural resources of each park, assessing resources within their larger cultural, chronological, and geographic contexts. The resulting inventories will provide the substantive data required for (1) nominating resources to the National Register of Historic Places; (2) general park planning and specific proposals for preserving, protecting, and treating cultural resources to achieve desired conditions; (3) land acquisition, development, and maintenance activities; (4) interpretation, education, and natural resource management activities; and (5) compliance with legal requirements.</p>	<p>Decision-making Guidance</p> <p>Capturing the essence of wilderness historic resources through documentation is the most important first step in addressing historic resources in wilderness. In many cases, this information may be the only aspect of the resource or human dimension of the place that remains.</p> <p>Documentation involves inventory to locate resources, and resource recording through any combination of measured drawings, photographs, written architectural and/or site descriptions, and written history or documented oral history.</p>

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
Standards for Documentation	
<p><i>Standard I. Historical Documentation Follows a Research Design that Responds to Needs Identified in the Planning Process</i></p> <p>Historical documentation is undertaken to make a detailed record of the significance of a property for research and interpretive purposes and for conservation of information in cases of threatened property destruction.</p> <p>Documentation must have defined objectives so that proposed work may be assessed to determine whether the resulting documentation will meet needs identified in the planning process. The research design or statement of objectives is a formal statement of how the needs identified in the plan are to be addressed in a specific documentation project. This is the framework that guides the selection of methods and evaluation of results and specifies the relationship of the historical documentation efforts to other proposed treatment activities.</p>	<p>Inventory and documentation should be appropriate to the research, planning, and/or treatment needs.</p> <p>For example, inventory in wilderness areas should incorporate predictive modelling where appropriate, since complete survey coverage in vast areas is typically infeasible. Carefully consider the minimum requirements and minimum tool necessary for conducting inventory and documentation.</p> <p>Complete documentation should be employed for significant tangible cultural resources that will either be removed or allowed to decay. For archeological resources, this may include excavation if resources will otherwise be lost to natural processes.</p>
<p><i>Standard II. Historical Documentation Employs an Appropriate Methodology to Obtain the Information Required by The Research Design</i></p> <p>Methods and techniques of historical research should be chosen to obtain needed information in the most efficient way. Techniques should be carefully selected, and the sources should be recorded so that other researchers can verify or locate information discovered during the research.</p>	<p>NPS heritage documentation programs may be useful for complete documentation of wilderness cultural resources: <i>Historic American Building Survey</i> (HABS) emphasizes utilitarian and vernacular buildings; <i>Historic American Engineering Record</i> (HAER) can address roads, trails, bridges, abandoned railroad systems, water conveyances, mining operations, etc., and <i>Historic American Landscape Survey</i> (HALS) is appropriate for abandoned homesteads, logged landscapes, quarries, etc.</p>

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p><i>Standard III. The Results of Historical Documentation Are Assessed Against the Research Design and Integrated into the Planning Process</i></p> <p>Documentation is one product of research; information gathered about the usefulness of the research design itself is another. The research results are assessed against the research design to determine how well they meet the objectives of the research. The results are integrated into the body of current knowledge and reviewed for their implications for the planning process. The research design is reviewed to determine how future research designs might be modified based on the activity conducted.</p>	<p>Documentation should be used to inform wilderness character assessments, wilderness character monitoring, long term cultural resource planning, treatment of cultural resources, and ecological restoration activities (among others). Documentation should be used to support regulatory compliance for management actions in wilderness, especially any treatment of historic buildings and structures.</p>
<p><i>Standard IV. The Results of Historical Documentation Are Reported and Made Available to the Public</i></p> <p>Research results must be accessible to prospective users. Results should be communicated to the professional community and the public in reports summarizing the documentation activity and identifying the repository of additional detailed information. The goal of disseminating information must be balanced, however, with the need to protect sensitive information whose disclosure might result in damage to properties.</p>	<p>Documentation should make the wilderness stories available to the public. This can be achieved by website posting, information in permit documents, interpretive brochures or site bulletins, information at visitor centers, wilderness centers, wayside exhibits and signs or exhibits outside wilderness at trailheads.</p>
<p><i>The Secretary's Standards and Guidelines for Federal Agency Preservation Programs</i></p> <p>Standard 6, Guideline (b) Where the agency determines in accordance with [NHPA] Section</p>	<p>Complete documentation should be employed for significant tangible cultural resources that will either be removed or allowed to decay.</p>

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p>106 that maintaining or rehabilitating a historic property for contemporary use in accordance with the Secretary's Standards is not feasible, the agency must provide appropriate recording of the historic property in accordance with [NHPA] Section 110(b) before it is altered, allowed to deteriorate, or demolished.</p>	
<p>PRESERVATION</p> <p>The act or process of applying measures necessary to sustain the existing form, integrity, and materials of a historic property.</p>	
<p><i>Management Policies</i></p> <p><i>Section 6.2.1.2 Additional Considerations in Determining (Wilderness) Eligibility:</i></p> <p>The presence of historic structures does not make an area ineligible for wilderness. A recommendation may be made to include a historic structure in wilderness if (1) the structure would be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.</p> <p><i>Section 6.3.10 Management Facilities:</i></p> <p>...A decision to construct, maintain, or remove an administrative facility will be based primarily on whether or not the facility is required to preserve wilderness character or values, not on consideration of administrative convenience, economic effect, or convenience to the public or park staff. Maintenance or the removal of historic structures will also comply with cultural resource protection and preservation policies and directives, and with the concept of minimum requirement management techniques for wilderness.</p> <p><i>Section 6.3.8 Cultural Resources:</i></p> <p>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... The Secretary of</p>	<p>Decision-making Guidance</p> <p>When to choose preservation as the most appropriate treatment:</p> <ul style="list-style-type: none"> • When a historic or prehistoric building or structure is a National Historic Landmark (NHL), an element of an NHL district, or part of a World Heritage Site it should be prioritized for preservation • When a historic or prehistoric building or structure is identified in park or wilderness legislation, or in wilderness planning documents for retention as part of a wilderness area's unique wilderness character it should be prioritized for preservation • When a historic building or structure is identified for retention, but has no approved administrative use, a park may choose to maintain it in its "historic state" (e.g., preserved, or in a state of "arrested decay") after creation of record of completion of regulatory compliance with NEPA and NHPA • When a historic building or structure that has an approved administrative use, is identified as the minimum necessary for the administration of wilderness, it should be preserved to retain both its historical value and continued use • When a historic site or landscape is identified in wilderness planning documents for preservation, a park may choose to preserve the setting or vegetation patterns through vegetation management.

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	<i>...as Applied in a Wilderness Context</i>
<p>the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance.</p> <p><i>Cultural Resource Management, Section 5.3.5.4.1 Preservation:</i></p> <p>A structure will be preserved in its current condition if: that condition allows for satisfactory protection, maintenance, use, and interpretation; or another treatment is warranted but cannot be accomplished until some future time.</p>	<p>As the treatment with the most minimalist approach, preservation is the preferred treatment in wilderness when a resource has been identified for retention. If it has been determined that a structure will remain in wilderness, an inspection schedule should be created and followed to ensure treatments necessary to sustain the structure are as minimally invasive as possible. This practice may increase the likelihood that the treatments can be performed using non-mechanized tools and without motorized or mechanized transport.</p>
Standards for Preservation	
<p>1) A property will be used as it was historically or be given a new use that maximizes the retention of distinctive materials, features, spaces, and spatial relationships. Where a treatment and use have not been identified, a property will be protected and, if necessary, stabilized until additional work may be undertaken.</p>	<p>In keeping with <i>NPS Management Policies (2006), Section 6.3.10</i>, any administrative use of a historic building or structure in wilderness, whether based on historical precedent (i.e., “used as it was historically”) or not, must be justified as necessary to meet the minimum requirements for the administration of an area as wilderness. A decision to maintain an administrative facility will be based primarily on whether or not the facility is necessary to preserve wilderness character or values, not on consideration of administrative convenience, economic effect, or convenience to the public or park staff.</p> <p>In keeping with <i>NPS Management Policies (2006), Section 5.3.5.4.7</i>, the National Historic Preservation Act, and Executive Order 13006, when a historic building or structure can accommodate a valid administrative use, for which a new structure would otherwise be built, re-use of a historic building or structure should be considered prior to any new construction.</p> <p>Any re-use of historic buildings or structures should be limited to valid administrative uses, and in situations where no net increase of structures in wilderness occurs. Parks should not initiate new uses for the primary purpose of maintaining and reusing a historic building or structure.</p>
<p>2) The historic character of a property will be retained and preserved. The replacement of intact</p>	<p>Monitoring schedules should be established to recognize treatment needs early enough to use the</p>

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	<i>...as Applied in a Wilderness Context</i>
or repairable historic materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.	least-invasive methods, such as epoxy for failing wood, or repointing for failing masonry. This minimizes the level of administrative action, avoids unnecessary “development,” and is in keeping with a “minimum requirements” approach.
3) Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve existing historic materials and features will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.	
4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.	Due to the additional challenges of performing preservation work in wilderness, particular care should be taken to identify situations where recent changes to a historic building or structure no longer have a function, and restoration treatment should be considered before the changes are of an age to be considered historically significant.
5) Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.	<p>Where native materials were harvested on site for original or subsequent periods of construction, they should be used for preservation treatment, where possible. Any decision to do so must take into consideration potential impacts to natural resources.</p> <p>Where historically appropriate for preservation purposes, use of traditional skills and tools will be emphasized as a means of retaining and sharing knowledge and skills.</p>
6) The existing condition of historic features will be evaluated to determine the appropriate level of intervention needed. Where the severity of deterioration requires repair or limited replacement of a distinctive feature, the new material will match the old in composition, design, color, and texture.	See above.
7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.	

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.	Archeological resources are also typically aspects of wilderness character and impacts to these should be considered in the decision-making process. Treatment of archeological resources should be developed as part of interdisciplinary discussions and be supported by minimum requirement/ minimum tool analysis.
REHABILITATION <p>The act or process of making possible a compatible use for a property through repair, alterations, and additions while preserving those portions or features which convey its historical, cultural, or architectural values (may also be used to describe extensive intervention to bring a severely deteriorated historic property into a state in which preservation is possible).</p>	
<i>Management Policies</i> <i>6.2.1.2 Additional Considerations in Determining (Wilderness) Eligibility:</i> <p>The presence of historic structures does not make an area ineligible for wilderness. A recommendation may be made to include a historic structure in wilderness if (1) the structure would be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.</p> <p><i>6.3.10 Management Facilities:</i> ...A decision to construct, maintain, or remove an administrative facility will be based primarily on whether or not the facility is required to preserve wilderness character or values, not on consideration of administrative convenience, economic effect, or convenience to the public or park staff. Maintenance or the removal of historic structures will also comply with cultural resource protection and preservation policies and directives, and with the concept of minimum requirement management techniques for wilderness.</p> <p><i>6.3.8 Cultural Resources:</i> 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</p>	Decision-making Guidance <p>When to choose rehabilitation as the most appropriate treatment:</p> <ul style="list-style-type: none"> • Rehabilitation should be carefully considered in wilderness because it typically involves substantial treatment that can be construed as “development” in Wilderness Act terminology • Rehabilitation should only be considered in cases where the historic building or structure is determined to be necessary for administrative use • Rehabilitation should be selected only when preservation alone will not achieve the agency’s objectives for the administrative use of the building or structure

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p>of wilderness character and values... The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance (including documentation).</p> <p><i>5.3.5.4.2 Rehabilitation:</i></p> <p>A historic structure may be rehabilitated (rehabilitations do not apply to prehistoric structures) for contemporary use if it cannot adequately serve an appropriate use in its present condition; and rehabilitation will retain its essential features and will not alter its integrity and character or conflict with approved park management objectives.</p>	
Standards for Rehabilitation	
<p>1) A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.</p>	<p>Use based on historical precedent must be justified as the minimum requirement necessary for the administration of an area as wilderness. New use should also be limited to the minimum requirement necessary and should be limited to situations where no net increase of buildings or structures in wilderness occurs. Parks should not initiate new uses for the primary purpose of maintaining and reusing a historic building or structure.</p> <p>If another building or structure, historic or not, can no longer fulfill its established function an existing vacant historic building or structure may be used to meet the need providing that disposition planning is initiated for the obsolete building or structure. Parks should not initiate new uses for the primary purpose of reusing a historic building or structure.</p> <p>In keeping with <i>NPS Management Policies 5.3.5.4.7</i>, the National Historic Preservation Act, and Executive Order 13006, re-use of historic buildings or structures should be considered over constructing any new administrative facility.</p> <p>In some instances, rehabilitation may be considered when a resource holds a high level of significance (such as a National Historic Landmark) and requires substantial preservation treatment in order to improve its condition to a status that is maintainable.</p>

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
2) The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.	
3) Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural features or elements from other historic properties, will not be undertaken.	
4) Changes to a property that have acquired historic significance in their own right will be retained and preserved.	Due to the additional challenges of performing rehabilitation work in wilderness, particular care should be taken to identify situations where changes to a historic property no longer have a function, and rehabilitation treatment should be considered before the changes are of an age to be considered historically significant.
5) Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.	<p>Where native materials were harvested on site for original or subsequent periods of construction, they should be used for preservation treatment, where possible. Any decision to do so must take into consideration potential impacts to natural resources.</p> <p>Where historically appropriate for preservation purposes, use of traditional skills and tools will be emphasized as a means of retaining and sharing knowledge and skills.</p>

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	<i>...as Applied in a Wilderness Context</i>
6) Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.	See above. If use of locally harvested materials is either not historically appropriate or infeasible, new historically appropriate replacement materials should be brought to the site only after completing the minimum requirements/minimum tool analysis.
7) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.	
8) Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.	Archeological resources are also typically aspects of wilderness character and impacts to these should be considered in the decision-making process. Treatment of archeological resources should be developed as part of interdisciplinary discussions and be supported by minimum requirement/ minimum tool analysis.
9) New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.	Additions, alterations, or related new construction must be justified as the minimum requirement necessary to support the administration of the area as wilderness.
10) New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.	

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p>RESTORATION</p> <p>The act or process of accurately depicting the form, features, and character of a property as it appeared at a particular period of time by means of the removal of features from other periods in its history and reconstruction of missing features from the restoration period.</p>	
<p><i>Management Policies</i></p> <p><i>6.2.1.2 Additional Considerations in Determining (Wilderness) Eligibility:</i></p> <p>The presence of historic structures does not make an area ineligible for wilderness. A recommendation may be made to include a historic structure in wilderness if (1) the structure would be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.</p> <p><i>6.3.10 Management Facilities:</i></p> <p>...A decision to construct, maintain, or remove an administrative facility will be based primarily on whether or not the facility is required to preserve wilderness character or values, not on consideration of administrative convenience, economic effect, or convenience to the public or park staff.</p> <p>Maintenance or the removal of historic structures will also comply with cultural resource protection and preservation policies and directives, and with the concept of minimum requirement management techniques for wilderness.</p> <p><i>6.3.8 Cultural Resources:</i></p> <p>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... The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance (including documentation).</p>	<p>Decision-making Guidance</p> <p>When to choose restoration as the most appropriate treatment:</p> <ul style="list-style-type: none"> • Restoration should be carefully considered in wilderness because it typically involves substantial treatment (or “development” in Wilderness Act terminology) • Restoration should be selected only in situations where returning a historic building or structure to an earlier period is essential to the public’s understanding of the park’s cultural associations, and necessary to achieve an agency’s objectives for wilderness • Restoration as the preferred treatment is documented in a park planning document

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p><i>5.3.5.4.3 Restoration:</i></p> <p>A structure may be restored to an earlier appearance if: all changes after the proposed restoration period have been professionally evaluated, and the significance of those changes has been fully considered; restoration is essential to the public's understanding of the park's cultural associations; sufficient data about that structure's earlier appearance exist to enable its accurate restoration; and the disturbance or loss of significant archeological resources is minimized and mitigated by data recovery.</p>	
Standards for Restoration	
<p>1) A property will be used as it was historically or be given a new use which reflects the property's restoration period.</p>	<p>Use based on historical precedent must be justified as the minimum requirement necessary for the administration of an area as wilderness. New use should also be limited to the minimum necessary and should be limited to situations where no net increase of buildings or structures in wilderness occurs. Parks should not initiate new uses for the primary purpose of maintaining and reusing a historic building or structure.</p> <p>If another building or structure, historic or not, can no longer fulfill its established function an existing vacant historic building or structure may be used to meet the need providing that disposition planning is initiated for the obsolete building or structure.</p>
<p>2) Materials and features from the restoration period will be retained and preserved. The removal of materials or alteration of features, spaces, and spatial relationships that characterize the period will not be undertaken.</p>	
<p>3) Each property will be recognized as a physical record of its time, place, and use. Work needed to stabilize, consolidate, and conserve materials and features from the restoration period will be physically and visually compatible, identifiable upon close inspection, and properly documented for future research.</p>	

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	<i>...as Applied in a Wilderness Context</i>
4) Materials, features, spaces, and finishes that characterize other historical periods will be documented prior to their alteration or removal.	
5) Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize the restoration period will be preserved.	
6) Deteriorated features from the restoration period will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials.	<p>Where native materials were harvested on site for the original or target restoration periods of construction, they should be used for preservation treatment, where possible. Any decision to do so must take into consideration potential impacts to natural resources.</p> <p>Where historically appropriate for preservation purposes, use of traditional skills and tools will be emphasized as a means of using the minimum tool or method to minimize impacts to wilderness character and retaining and sharing knowledge and skills.</p>
7) Replacement of missing features from the restoration period will be substantiated by documentary and physical evidence. A false sense of history will not be created by adding conjectural features, features from other properties, or by combining features that never existed together historically.	
8) Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.	
9) Archeological resources affected by a project will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.	<p>Archeological resources are also typically aspects of wilderness character and impacts to these should be considered in the decision-making process. Treatment of archeological resources should be developed as part of interdisciplinary discussions and be supported by minimum requirement/minimum tool analysis.</p>
10) Designs that were never executed historically will not be constructed.	

<p><i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i></p>	<p>...as Applied in a Wilderness Context</p>
<p>RECONSTRUCTION</p> <p>The act or process of depicting, by means of new construction, the form, features, and detailing of a non-surviving site, landscape, building, structure, or object for the purpose of replicating its appearance at a specific period of time and in its historic location.</p>	
<p><i>Management Policies</i></p> <p><i>5.3.5.4.4 Reconstruction of Missing Structures:</i></p> <p>No matter how well conceived or executed, reconstructions are contemporary interpretations of the past rather than authentic survivals from it. The National Park Service will not reconstruct a missing structure unless: there is no alternative that would accomplish the park's interpretive mission; sufficient data exist to enable its accurate reconstruction based on the duplication of historic features substantiated by documentary or physical evidence rather than on conjectural design or features from other structures; reconstruction will occur in the original location; the disturbance or loss of significant archeological resources is minimized and mitigated by data recovery; and reconstruction is approved by the Director.</p> <p><i>6.2.1.2 Additional Considerations in Determining (Wilderness) Eligibility:</i></p> <p>The presence of historic structures does not make an area ineligible for wilderness. A recommendation may be made to include a historic structure in wilderness if (1) the structure would be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.</p> <p><i>6.3.10 Management Facilities:</i></p> <p>...A decision to construct, maintain, or remove an administrative facility will be based primarily on whether or not the facility is required to preserve wilderness character or values, not on consideration of administrative convenience, economic effect, or convenience to the public or park staff.</p>	<p>Decision-making Guidance</p> <p>Reconstruction should generally not be considered in wilderness.</p> <ul style="list-style-type: none"> • Reconstruction may be appropriate only in situations where authorized by park legislation or approved planning and environmental compliance decision document • Reconstruction for historic preservation purposes requires approval of the agency director • Before considering reconstruction in wilderness, all feasible alternatives outside wilderness must be explored • Reconstruction should not create an attraction in a wilderness area

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p>Maintenance or the removal of historic structures will also comply with cultural resource protection and preservation policies and directives, and with the concept of minimum requirement management techniques for wilderness.</p> <p><i>6.3.8 Cultural Resources:</i></p> <p>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... The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance (including documentation).</p>	
Standards for Reconstruction	
<p>1) Reconstruction will be used to depict vanished or non-surviving portions of a property when documentary and physical evidence is available to permit accurate reconstruction with minimal conjecture, and such reconstruction is essential to the public understanding of the property.</p>	<p>Reconstruction should not create an attraction in a wilderness area.</p>
<p>2) Reconstruction of a landscape, building, structure, or object in its historic location will be preceded by a thorough archeological investigation to identify and evaluate those features and artifacts which are essential to an accurate reconstruction. If such resources must be disturbed, mitigation measures will be undertaken.</p>	
<p>3) Reconstruction will include measures to preserve any remaining historic materials, features, and spatial relationships.</p>	
<p>4) Reconstruction will be based on the accurate duplication of historic features and elements substantiated by documentary or physical evidence rather than on conjectural designs or the availability of different features from other historic</p>	<p>Where native materials were harvested on site for the original or target restoration periods of construction, they should be used for preservation treatment, where possible. Any decision to do so must take into consideration potential impacts to the natural quality of wilderness character.</p>

NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines	...as Applied in a Wilderness Context
properties. A reconstructed property will re-create the appearance of the non-surviving historic property in materials, design, color, and texture.	Where historically appropriate for preservation purposes, use of traditional skills and tools will be emphasized as a means of minimizing impacts to wilderness character and retaining and sharing knowledge and skills.
5) A reconstruction will be clearly identified as a contemporary re-creation.	Reconstruction should not create an attraction in a wilderness area.
6) Designs that were never executed historically will not be constructed.	
<p>The following three treatments are not part of the Secretary's Standards for Treatment of Historic Properties and are not typical historic preservation treatments. They are presented and discussed here as options that should be considered in wilderness and are supported by the Secretary's standards for federal agency historic preservation programs.</p>	
<p>RELOCATION</p> <p>The act of moving a historic structure from its current location to a new location, either within or outside of wilderness.</p>	
<p>Management Policies</p> <p><i>6.2.1.2 Additional Considerations in Determining (Wilderness) Eligibility:</i></p> <p>The presence of historic structures does not make an area ineligible for wilderness. A recommendation may be made to include a historic structure in wilderness if (1) the structure would be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.</p> <p><i>6.3.10 Management Facilities:</i></p> <p>...A decision to construct, maintain, or remove an administrative facility will be based primarily on whether or not the facility is required to preserve wilderness character or values, not on consideration of administrative convenience, economic effect, or convenience to the public or park staff.</p>	<p>Decision-making Guidance</p> <p>When to consider relocation as the most appropriate treatment:</p> <ul style="list-style-type: none"> • Relocation should be carefully considered because it typically involves substantial intervention • Relocation within wilderness should be selected only in situations where moving a historic building or structure achieves objectives for administrative use or historic preservation that have been identified in wilderness planning documents, or for protection or restoration of critical ecosystem processes • Any proposal for relocation should afford serious consideration of new location outside of wilderness

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p>6.3.6 Cultural Resources:</p> <p>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... The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance (including documentation).</p> <p>5.3.5.4.5 Movement of Historic Structures:</p> <p>Proposals for moving historic structures will consider the effects of movement on the structures, their present environments, their proposed environments, and the archeological research value of the structures and their sites.</p> <p>No historic structure will be moved if its preservation would be adversely affected or until the appropriate recovery of significant archeological data has occurred. Prehistoric structures will not be moved.</p> <p>A nationally significant structure may be moved only if it cannot practically be preserved on its present site; or, the move constitutes a return to a previous historic location, and the previous move and present location are not important to the structure's significance.</p> <p>A historic structure of less-than-national significance may be moved if it cannot practically be preserved on its present site; or its present location is not important to its significance, and its relocation is essential to public understanding of the park's cultural associations.</p> <p>In moving a historic structure, every effort will be made to reestablish its historic orientation, immediate setting, and general relationship to its environment.</p>	<ul style="list-style-type: none"> • Relocation outside of wilderness should be considered for buildings and structures, features, and/or objects that are essential to the public's understanding of the park's cultural associations, and that would otherwise be lost to natural processes, after sufficient documentation of its original context • Relocation outside of wilderness should be considered when necessary to achieve an agency's objectives for wilderness (such as balancing other aspects of wilderness character), and the treatment is identified in a park planning document • Relocation outside of wilderness should be considered when a historic building's or structure's continued presence substantially impacts ecosystem processes

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p>The Secretary's Standards and Guidelines for Federal Agency Preservation Programs</p> <p><i>Standard 6, Guideline (g):</i></p> <p>Where it is not feasible to maintain a historic property, or to rehabilitate it for contemporary use, the agency may elect to modify it in ways that are inconsistent with the Secretary's Standards for Rehabilitation, allow it to deteriorate, or demolish it. However, the decision to act or not act to preserve and maintain historic properties should be an explicit one, reached following appropriate consultation within the Section 106 review process and in relation to other management needs.</p>	<p>The appropriate level of documentation (determined in consultation) should be employed for significant tangible cultural resources when relocation results in an adverse effect.</p>
<p>DISPOSITION OF REAL PROPERTY: The following two treatments would result in eventual or immediate loss of historic buildings or structures. As with all actions in wilderness, implementation of either of these would require documentation for applicable regulatory compliance and administrative records regarding park assets.</p>	
<p>MOULDERING</p> <p>The act or process of allowing landscapes, sites, buildings, structures and objects molder, or "turn to dust, crumble into particles, disintegrate; decay," essentially to return to nature; this is also characterized as "neglect," with the understanding that it leads to eventual loss.</p>	
<p><i>Management Policies</i></p> <p><i>6.2.1.2 Additional Considerations in Determining (Wilderness) Eligibility:</i></p> <p>The presence of historic structures does not make an area ineligible for wilderness. A recommendation may be made to include a historic structure in wilderness if (1) the structure would be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.</p> <p><i>6.3.8 Cultural Resources:</i></p> <p>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...The Secretary of</p>	<p>Decision-making Guidance</p> <p>When to consider moldering in wilderness:</p> <ul style="list-style-type: none"> • Historic buildings or structures that are not identified for active preservation may be allowed to molder • Historic buildings or structures that are not interrupting critical ecological processes or do not pose long-term ecological harm may be appropriate for moldering • Historic buildings or structures that are not identified for removal may be appropriate for moldering • Moldering would be appropriate in situations in which it is valuable to allow the natural aging process to unfold, providing opportunities for reflection on life cycles, the fleeting nature of human intervention in wild lands, a reminder of past human stories that occurred on the

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance (including documentation).	landscape, and the robust ability of wild nature to sustain itself
Secretary's Standards and Guidelines for Federal Agency Preservation Programs <i>Standard 6, Guideline (g):</i> Where it is not feasible to maintain a historic property, or to rehabilitate it for contemporary use, the agency may elect to modify it in ways that are inconsistent with the Secretary's Standards for Rehabilitation, allow it to deteriorate, or demolish it. However, the decision to act or not act to preserve and maintain historic properties should be an explicit one, reached following appropriate consultation within the Section 106 review process and in relation to other management needs.	The appropriate level of documentation (determined in consultation) should be employed for significant tangible cultural resources that will be allowed to molder.
Practice of Mouldering	<ul style="list-style-type: none"> • Mouldering may incorporate minimal actions to mitigate attractive nuisances or serious safety threats, such as removing broken window glass, removing hazardous materials, barricading open mine shafts, etc. • Mouldering will eventually lead to loss of the resource, and therefore should include all appropriate precursors (i.e., documentation, regulatory compliance, etc.)
DEMOLITION The act of destroying, or deconstructing and removing, a building or structure.	
<i>Management Policies</i> <i>6.2.1.2 Additional Considerations in Determining (Wilderness) Eligibility:</i> The presence of historic structures does not make an area ineligible for wilderness. A recommendation may be made to include a historic structure in wilderness if (1) the structure would be only a minor feature of the total wilderness proposal; and (2) the structure will remain in its historic state, without development.	Decision-making Guidance When to consider demolition in wilderness: <ul style="list-style-type: none"> • Demolition should be carefully considered in wilderness because it may involve substantial intervention and associated impacts to wilderness character • Demolition should be considered when necessary to achieve an agency's objectives for wilderness (such as balancing other

<i>NPS Management Policies (2006) and the Secretary of the Interior's Standards and Guidelines</i>	...as Applied in a Wilderness Context
<p><i>6.3.10 Management Facilities</i></p> <p>...A decision to construct, maintain, or remove an administrative facility will be based primarily on whether or not the facility is required to preserve wilderness character or values, not on consideration of administrative convenience, economic effect, or convenience to the public or park staff.</p> <p>Maintenance or the removal of historic structures will also comply with cultural resource protection and preservation policies and directives, and with the concept of minimum requirement management techniques for wilderness.</p> <p><i>6.3.8 Cultural Resources:</i></p> <p>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... The Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation projects provide direction for protection and maintenance (including documentation).</p>	<p>aspects of wilderness character), and the treatment is identified in a park planning document</p> <ul style="list-style-type: none"> • Demolition should be considered when a historic building's or structure's continued presence substantially impacts ecosystem processes and other qualities of wilderness character • Demolition will result in loss of the resource, and therefore should include all appropriate precursors (i.e., documentation, regulatory compliance, etc.)
<p>The Secretary's Standards and Guidelines for Federal Agency Preservation Programs</p> <p><i>Standard 6, Guideline (g):</i></p> <p>Where it is not feasible to maintain a historic property, or to rehabilitate it for contemporary use, the agency may elect to modify it in ways that are inconsistent with the Secretary's Standards for Rehabilitation, allow it to deteriorate, or demolish it. However, the decision to act or not act to preserve and maintain historic properties should be an explicit one, reached following appropriate consultation within the Section 106 review process and in relation to other management needs.</p>	<p>The appropriate level of documentation (determined in consultation) should be employed for significant tangible cultural resources that will be demolished.</p>

Appendix B. Process for Managing Historic Structures/Installations in Wilderness

