Cultural Resource Stewardship Assessment

Devils Tower National Monument

May 2019

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Contents

Executive Summary

In response to Director's Order 100, Resource Stewardship for the 21st Century and in support of A Call to Action and the Cultural Resource Challenge, a new Servicewide Cultural Resource Stewardship Assessment (CRSA) was initiated in 2016 to assess the knowledge and physical condition of park cultural resources and the overall health of cultural resource management programs. The CRSA provides park managers with a reliable assessment and report on current conditions, critical data gaps, and selected condition influences for cultural resources within their park. Based on that assessment, the CRSA provides recommendations to address resource needs and improve stewardship. Specifically, the CRSA will:

1. Synthesize scientific data and information to inform park resource management activities;
2. Assess stewardship activities to identify critical data gaps;
3. Define a list of actions to address resource needs and strategies for improving conditions;
4. Serve as a tool to communicate the status of the knowledge and physical condition of a park's cultural resources that are Fundamental Resources and Values (FRV) or Other Important Resources and Values (OIRV); and
5. Summarize and report on the overall health of a park's cultural resource management program.

The CRSA establishes a critical baseline for cyclical analysis of a park's cultural resource management. This baseline will guide managers in decision-making and investing in efforts that improve resource knowledge and conditions in the next century of National Park Service (NPS) stewardship.

Devils Tower National Monument

The Superintendent of Devils Tower National Monument (DETO) administers 1,347 acres in northeastern Wyoming, on the northwest edge of the Black Hills. The national monument – America's first – was decreed by President Theodore Roosevelt in 1906. Its purpose is to protect and preserve a geologic and sacred landmark: the 867-foot Tower is a world-famous monolith of phonolite porphyry, a rare igneous rock. Known by some American Indian Tribes as Bear's Lodge, the Tower also has been a place of spiritual importance for ages. Numerous prayer bundles and other personal offerings around the monument attest to ongoing traditional practice, and the entire monument is managed as an ethnographic landscape. Its archeological record reflects a prehistory dating back to the Paleoindian period, and its historic architecture demonstrates two classic NPS styles: Park Service Rustic style cabins from the Civilian Conservation Corps (CCC) Era, and Park Service Modern style buildings and other structures from the Mission 66 Era. Its museum collection includes everything from geological specimens to shoes and other gear used by pioneering rock climbers. Devils Tower is an iconic site on the Northern Great Plains, and is a remote place of peace, quiet, and personal reflection.

Cultural Resource Stewardship Assessment Tables

The stewardship information gathered for the CRSA is assembled through the use of ten assessment tables (Appendix 1) organized according to individual cultural resource categories (e.g., historic structures) and general management topics (e.g., climate stressors). The ten tables include:
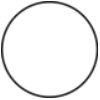
1. Archeology
2. Cultural Anthropology
3. Cultural Landscapes
4. Historic Structures
5. History
6. Museum Collections
7. Compliance
8. Native American Graves Protection and Repatriation Act (NAGPRA)
9. Geographic Information Systems (GIS)
10. Climate Stressors

Each assessment table includes a series of stewardship indicators and measures to evaluate the monument's cultural resource knowledge, physical conditions and program health. Each measure is assigned a status, trend, and confidence level based on the CRSA team's assessment. The table also records a rationale for the assessment and preliminary actions to address deficiencies identified. Data used for the assessment are obtained from multiple sources, including the monument's General Management Plan, Foundation Document, cultural resource baseline documentation and databases, discipline/program annual reports, and Servicewide cultural resource inventories.

Cultural Resource Stewardship Assessment Summary Table

The summary table on the next page provides an overall assessment of the stewardship status for each cultural resource category at DETO. This assessment is based on a combination of the status and trend of multiple indicators and specific measures of stewardship. The status and trends documented provide a useful point-in-time baseline to inform an understanding of the monument's cultural resource conditions and program health, along with an understanding of changing environmental conditions. The status and trend symbols used in the summary table are summarized in the following key. The background color represents the current condition status, the direction of the arrow summarizes the trend in condition, and the thickness of the outside line represents the degree of confidence in the assessment.

Stewardship Status		Trend in Stewardship		Confidence in Assessment	
🔴	Significant Concern	⬆	Improving	⬤	High
🟡	Caution	⬌	Unchanging	◯	Medium
🟢	Good	⬇	Deteriorating	◯	Low

Cultural Resource Stewardship Assessment Summary Table

Cultural Resource	Condition Status/Trend	Rationale
Archeology		100% of the monument was surveyed in 1998 and the report remains a useful, comprehensive document. A technical assistance request (TAR) for an updated monument-wide survey was accepted in 2018. The monument lacks a regular site condition assessment program, although an Intermountain Regional Office (IMRO) archeologist provides support under annual TARs. In 2017 DETO entered into a five-year interagency agreement with the U.S. Forest Service for archeological monitoring support. Most sites lack proof of determination of eligibility (DOE) and updated site forms are also needed. Geospatial data needs to be migrated to current data transfer standards.
Cultural Anthropology		This is perhaps the most significant cultural resource discipline for the monument: "American Indian Spiritual Values and Opportunity for Personal Reflection" is an FRV in the 2014 Foundation Document, the Tower itself is a Traditional Cultural Property (TCP), and the entire monument is managed as an ethnographic landscape. The staff has established good relationships with 26 associated Tribes and consults regularly, including at least one in-person meeting per year. Program shortfalls are in documentation and staffing rather than in knowledge and management practices, although a study is needed to determine if the monument has non-tribal Traditionally Associated Peoples (TAPs) and to gather additional documentation on tribal associations and ethnographic resources in the monument.
Cultural Landscapes		There are at least four cultural landscapes in the monument, none of which have been documented, evaluated, or assessed. The entire monument is an ethnographic landscape, it is managed as such, and this is identified as an OIRV in the Foundation Document under "Cultural Resources." DETO has recently secured funding for projects that will improve knowledge, inventory, and documentation indicators for cultural landscapes.
Historic Structures		Historic Structures are a Foundation Document OIRV under "Cultural Resources." Half were assessed in good condition and improving in 2005, though this information is outdated. All records in the List of Classified Structures (LCS) need to be recertified. DETO will update its 2004 Historic Structure Report (HSR) in 2019 with treatment plans for most of its CCC Era structures, but the lack of documentation, evaluation, and treatment plans for its Mission 66 structures will remain a liability for the near term.

Cultural Resource	Condition Status/Trend	Rationale
History		Existing documentation is generally good although aging, and a significant gap will be filled by the Historic Resource Study (HRS) funded for FY19. Criteria related to National Register of Historic Places (NRHP) documentation and DOEs were assessed with high confidence. However, the lack of any cultural resource expertise at the monument combined with the lack of a Regional Historian at IMRO is a significant concern, and accounts for the low to medium confidence in assessing history research and the general integration of cultural resource knowledge into planning, management, and programs.
Museum Collections		The monument has a good curation agreement with Mount Rushmore National Memorial (MORU) and completed a Collections Management Plan in 2015. 97% of its collection is cataloged, although two-thirds of records lack information in required fields. An archives survey on the monument was undertaken in July 2018. Archival materials were identified and need to be accessioned and moved to a curation facility. The monument needs a collection condition survey (CCS). Other priorities include establishing or improving Checklists and preventive conservation practices across its nine repositories.
Compliance		The monument follows a clear process and routinely consults with stakeholders early in project planning. The process is effective, but with calculated risks: There is no cultural resource specialist on staff, IMRO cannot review every project, and so some projects do not receive proper review by specialists. The monument does not consult with tribal partners on some projects, and needs to develop a process for consulting on all projects that may have an effect on Historic Properties (as defined in the National Historic Preservation Act (NHPA)) regardless of the scope and types of properties. The monument has a good relationship with the Wyoming State Historic Preservation Officer (SHPO), and per the 2008 NPS Nationwide Programmatic Agreement (PA) submits annual reports and meets biennially with the SHPO.
NAGPRA		The monument repatriated all known NAGPRA items in its collection in 2005-06. MORU records show no remaining NAGPRA items, but Western Archeological and Conservation Center (WACC) records indicate several potential objects of cultural patrimony in the collection. This discrepancy needs to be resolved. DETO has no inadvertent discovery protocol or comprehensive agreements.

Cultural Resource	Condition Status/Trend	Rationale
GIS		Monument staff use GIS for analysis and planning, and existing data is adequate for most purposes. Archeological data needs to be migrated to current geospatial data transfer standards, and missing data (survey coverage, site boundaries) needs to be located or reconstituted. Site boundaries are in need of field-verification or re-recording but the monument does not have the resources to do so.
Climate Stressors		The monument is currently undergoing a Climate Change Scenario Planning project in conjunction with its Resource Stewardship Strategy (RSS), which together will identify climate change projections for the monument and specifically how its cultural resources may be impacted, and prioritize mitigation and treatment actions.

General Findings

Documented archeological and architectural resources are in fair to good condition, and key processes such as project review under Section 106 of the NHPA and tribal relations are generally healthy, though with a caveat regarding Section 106 (See "Key Issues and Challenges," below). Monument staff work well together and exhibit knowledge of and interest in preserving the monument's cultural resources. The monument works with IMRO and extra-agency staff to manage its archeological resources and manages its ethnographic resources in consultation with tribal partners. IMRO provides critical technical expertise and assistance, although most IMRO programs lack robust staffing and so assistance is not always readily available.

The Chief of Resource Management (Chief of RM) is the only permanent employee in DETO's Resource Management Division. This position is under a Natural Resources Program Manager position description, and over the years has been filled by staff with a science background and little cultural resource expertise. By necessity, the Chief of RM has become an Integrated Resource Manager, tasked with managing both natural and cultural resources, and with serving as the primary tribal liaison. The Chief of RM manages the natural resource program, which has some term and temporary employees, and the cultural resource program which typically has no staff. The current Chief is proactive, and improvements in the monument's stewardship posture during her tenure are listed in the next section. However, the lack of in-house cultural resource expertise combined with thin staffing has compromised what may otherwise have been a healthy program. A term Environmental Protection Specialist has recently been hired to work with Tribes on agreements and other compliance requirements related to the NPS plant gathering regulation (36 CFR 2.6), and this may provide short-term relief if the incumbent is able to assist in general cultural resource management activities and compliance. However, the monument needs a permanent cultural resource professional in order to properly manage its resources.

Summary of Stewardship Activities

The list below provides examples of recent stewardship activities and accomplishments by monument staff and partners to maintain or improve the condition of cultural resources and values for this and future generations, and considers activities from 2013 to the present:

- Initiated aggressive efforts in strategic planning to improve resource stewardship. The monument has volunteered to pilot both the Climate Change Scenario Planning program and CRSA program for the region, and is simultaneously developing an RSS.
- Improved relations with 26 associated Tribes. The monument routinely consults with tribal partners for Section 106 review and other projects such as updated interpretive signage, and the entire monument is managed as a landscape-level ethnographic resource.
- Hired an archeological technician in 2015-2016 to mitigate visitor impacts to the Tower Trail and adjacent archeological sites, the monument's most at-risk sites.
- Executed a five-year interagency agreement with Black Hills National Forest in 2017 for archeological support, especially for monitoring ground-disturbing activities.
- Completed a Collections Management Plan in 2015.
- Secured funding for an HRS in 2019, the monument's first.
- Received funding for a Cultural Landscape Inventory (CLI) of the Tower Trail and Red Beds Trail landscape for 2019.
- Funded an updated HSR with parts 1 and 2 for the monument's CCC Era buildings, which will be completed in 2019.
- Submitted multiple TARs for IMRO assistance, including LCS updates, Project Management Information System (PMIS) proposal writing, archeological site condition assessments, Mission 66 DOEs, and Section 106 training.
- Hired an Environmental Protection Specialist to work with associated Tribes on agreements and other compliance requirements related to the NPS plant gathering regulation. A consultation took place in October 2018.
- Completed a condition assessment of the Tower Ladder in July 2018 through Vanishing Treasures (VT), which will provide the monument with treatment options.

Key Issues and Challenges for Consideration in Management Planning

The lack of an in-house cultural resource professional impacts almost every program area, especially Compliance and History, and this presents the monument's biggest management challenge. Issues that a specialist would have caught go undetected until they become problems. For example, it was not recognized until relatively recently that Mission 66 structures needed to be inventoried and evaluated, and this along with outdated NRHP documentation account for the lower stewardship rating for the Historic Structures program, despite the fact that the CCC Era structures are well-managed. Cultural Landscapes documentation and treatment planning needs had not been adequately identified or addressed, although the Chief of RM manages the entire monument as an ethnographic landscape. The Compliance rating would have been "good" except that some projects are not reviewed by anyone meeting the Secretary of the Interior's (SOI) Professional Qualification Standards due to short staffing at IMRO and lack of qualified staff at the monument. Such projects are non-compliant, regardless of SHPO

concurrence. Admirably, the monument engages routinely with its 26 associated Tribes which is a significant time investment that, without staff to share the burden, diverts attention from other program needs. The History program has suffered because the lack of a Regional Historian at IMRO is not compensated for by cultural resource expertise at the monument. Resource stewardship would markedly improve with one permanent cultural resource professional on staff.

The monument lacks several important Section 110 inventory and evaluation projects as well as other needed studies: None of the four potential cultural landscapes on the monument have been documented and so their character defining features are unidentified, and Mission 66 facilities have not been inventoried or evaluated for NRHP eligibility. These resources also need treatment plans. Uncatalogued archival materials are located on the monument which need further appraisal, and the museum collection has never had a condition assessment. DOEs and NRHP nomination documentation are generally old or lacking (or at least not on file) for resources across program areas.

The delicate task of managing the Tower itself as both a TCP and a popular climbing destination through engagement with tribal partners and climbing interest groups has been a success, though an ongoing challenge.

List of Preliminary Actions

The list below includes preliminary actions to address resource needs and improve stewardship. These actions can serve as the basis for the development of comprehensive strategies and specific projects as part of an RSS. The list begins with the highest priorities for cultural resource management followed by a listing of all action items identified in the CRSA by cultural resource category.

High-Priority Cultural Resource Actions

- Hire a permanent interdisciplinary cultural resource professional (0170/0190/0193/0807/0808/1015), ideally with experience in Section 106 compliance and tribal relations, at least at the GS-09 level (See "Key Issues and Challenges," above). If this is not possible, explore options for a shared position between parks in the Eastern Montana-Wyoming Group or Northern Great Plains Network.
- Record, evaluate, and develop treatment plans for Mission 66 Era resources. This is best accomplished by requesting interrelated projects through PMIS, prioritized as follows:
  - Architectural survey of potential Mission 66 historic district, including inventory form and recommended DOE for each individual structure (top priority due to development pressures and planned projects);
  - CLI of Mission 66 Administrative Area and Campground landscape;
  - HSR (parts 1 and 2) and accompanying Historic Preservation Guide (HPG) for all Mission 66 structures. This could likely be accomplished in a single document due to their similar building technology and design, with the HPG as an appendix to the HSR; and
  - Cultural Landscape Report (CLR) (parts 1 and 2) for Mission 66 Administrative Area and Campground landscape.
- Continue the highly successful collections management and storage agreement with MORU.
- Coordinate with the IMRO Museum Services Program to develop and complete a CCS, and to assess and refine preventive conservation strategies at all curation facilities.

- Submit a TAR to the IMRO GIS office:
  - Request that staff create a Tower TCP boundary.
  - Request that staff migrate archeological site boundary data to current geospatial data transfer standards.

Archeology Actions

- Obtain DOE documentation proving SHPO concurrence for sites that lack such documentation in the monument's records. This could be done as part of the updated archeological survey, a cyclical site condition assessment program, or a separate project. Sites that lack proof of consensus DOE are "unevaluated" for Section 106 purposes, and the NPS Nationwide PA cannot be used for streamlined consultation if any of these sites are within the project's area of potential effects.
- Conduct an updated archeological inventory and evaluation of the monument (TAR accepted in 2018). IMRO archeologists estimate that the survey could be completed over a five-year period. The scope should include:
  - Formal research design generated before work begins;
  - Comprehensive literature review;
  - Survey of entire monument, guided by research design;
  - For each site, whether newly discovered or previously known: documentation on a state archeological site form, NRHP evaluation (known sites lack documentation of SHPO concurrence), GIS spatial data for boundaries, and condition assessment;
  - Note on geospatial data: Ensure new data conforms to current geospatial data transfer standards, and is uploaded to the regional dataset. Coordinate with IMRO GIS office to migrate legacy data before new data is uploaded (submit a TAR for this);
  - Management recommendations;
  - Consultation with SHPO over all DOEs (follow up with SHPO to obtain final concurrence documentation for monument records);
  - Data entry into the Archeological Sites Management Information System (ASMIS);
  - Accessioning and cataloging of the final report, field notes and related project documents, and any collected artifacts into the monument's museum collection. Coordinate with MORU curator and IMRO Museum Services to clarify requirements prior to survey.
- Establish a formal, regular site condition assessment program and enter a re-visitation schedule into each site's ASMIS record. Work with IMRO staff to determine best mechanism (i.e. combination of IMRO archeologist and interagency agreement?). Re-visitation includes:
  - Updating condition assessments;
  - Confirming/updating GIS spatial data for site boundaries as appropriate;
  - Updating site forms as appropriate, including consulting with SHPO over changes in NRHP eligibility if integrity is determined to have been compromised.
  - Potentially consulting over DOEs for sites that lack proof of SHPO concurrence.
- Request a project through PMIS to document deteriorating pictograph sites for data recovery using appropriate technologies.

- Coordinate with IMRO archeologists to develop management recommendations for sites assessed as other than good condition. The intent is to improve site condition if possible, otherwise to maintain and monitor site condition in order to protect data potential.
- Coordinate with Jacquelin St. Clair (IMRO archeologist) to add the four sites recorded in 2015 to ASMIS. The sites were originally recorded as unevaluated/needs data but then updated and recommended eligible. Follow up with SHPO to get a copy of concurrence documentation.
- Review and validate/update ASMIS records. Coordinate with IMRO archeologists to determine if this is best done through a TAR or a PMIS project.
- Determine if the most at-risk sites - those along the Tower Trail - would benefit from being entered into the Facility Management Software System (FMSS). This will add to the database maintenance workload, but may generate cyclical funding for condition assessments and treatment. For advice, contact Jacquelin St. Clair and the IMRO Facilities Branch Chief for Wyoming.
- Create an internal continuity document that summarizes information on archeological resources, updated as necessary. This will be important information for future Chiefs of RM. Include brief descriptions of key management issues, complete bibliography (see Appendix 3), and a list (or database) and map of known archeological resources.
- Ensure that site condition assessment needs are included in planning and management documents.
- Contact the Regional Archeologist for guidance regarding Certificates of Availability for archeological reports, per Archeological Resources Protection Act (ARPA) regulations.

Cultural Anthropology Actions

- Hire a permanent interdisciplinary cultural resource professional with experience in tribal relations, at least at the GS-09 level.
- Consult with Tribes to clarify their wishes regarding formal NRHP nomination of the Tower as a TCP, and/or documentation of other potential TCPs (sweat lodge, Sun Dance grounds, etc.).
- Develop an SOP for cultural offerings; their protection, documentation, and criteria for removal.
- If Tribes are interested in holding Sun Dances at the monument, ensure that special use permits and compliance requirements are completed well in advance.
- Conduct multiple Traditional Use Studies, perhaps for six Tribes at a time, through PMIS. The significance of monument resources to associated Tribes is known generally, but not the specifics for each Tribe.
- Determine if the oral histories conducted for the audio kiosk are useful as an ethnographic record, and if so then transcribe the full recordings.
- Conduct a Rapid Ethnographic Assessment Project (REAP) to evaluate the potential for other TAPs, for example among local or regional communities. To date ethnographic research has focused mostly on associated Tribes, or recreational climbers vis-à-vis Tribes.
- Uploaded seven reports to the Integrated Resource Management Applications (IRMA) database. See Appendix 3, Bibliography: all entries other than the two Judy Shafer (1996) document sets and the oral histories (unless they are transcribed) should be uploaded.

- Create an internal continuity document that summarizes the monument's consultation history and describes its consultation practices, updated as required. This would be valuable information for future Superintendents and Chiefs of RM.
- Follow up with WACC and MORU over the discrepancy between their records regarding Objects of Cultural Patrimony in the monument's museum collection until the issue is resolved.

Cultural Landscapes Actions

- Conduct a CLI of the Mission 66 Administrative Area and Campground landscape.
- Conduct a CLI of the CCC Era landscape. Ensure that as-yet unrecorded CCC Era features (springs, spring boxes, wells, etc.) are included.
- Conduct a CLI of the monument-wide ethnographic landscape.
- Complete a CLR (parts 1 and 2) of the Mission 66 Administrative Area and Campground landscape.
- Complete a CLR (parts 1 and 2) of the Tower Trail and Red Beds Trail landscape.
- Complete a CLR (parts 1 and 2) of the CCC Era landscape.
- Complete a CLR (parts 1 and 2) of the monument-wide ethnographic landscape.
- Consult with the SHPO on all DOEs in completed CLIs, and on CLRs. If the SHPO concurs that treatments recommended in a CLR would not be adverse, then this information could be used to define projects that are more likely to be NRHP compliant.
- Complete NRHP documentation for cultural landscapes as CLIs are completed.
- Ensure that all structures and features determined to contribute to a cultural landscape are entered into FMSS and marked as a heritage asset. Facilities that are likely to be contributing to a cultural landscape (see table in Cultural Landscapes Worksheet, Appendix 2) should be treated as eligible pending a consensus DOE.
- Ensure that FMSS specialists are trained to consistently enter new treatment plans and treatment work accomplished into the appropriate sections. Consider including this as standard language in project scoping (i.e. "enter treatment recommendations into FMSS").
- Work with IMRO to develop interim treatment guidance (pending CLRs) for landscape features and incorporate this into statements of work as required.
- Upload completed CLIs and CLRs to IRMA, including the upcoming Tower Trail and Red Beds Trail CLI. Submit copies to IMRO and distribute results to monument staff.
- Submit a TAR to update records in CLI. For example, delete "Graham Cabins" (# 890135) and combine "Entrance Road/Station" and "Old Administrative Area" (# 890133 and 890134) into a single record, "CCC Era."
- Update/clarify cultural landscape needs in planning document updates.
- Assess the need for Historic American Landscapes Survey (HALS) documentation based on CLIs as they are completed.
- Explore the potential for working with universities that may have graduate-level historical landscape programs.

Historic Structures Actions

- Conduct an architectural inventory and determination of eligibility for Mission 66 resources and consult with the SHPO over proposed DOEs. Ensure structures determined as eligible are entered into LCS and coded in FMSS as heritage assets (see Appendix 5).
- Complete an HSR and accompanying HPG for Mission 66 resources. Recommend capturing all resources in one report due to their similar building technology and design.
- Update LCS to add currently undocumented/unevaluated features such as spring boxes, headwalls, and wells based on CCC Era landscape CLI (when completed).
- Consult regularly with Cultural Resource Management Advisor Team (CRM Team) and qualified historical architect for development of treatment plans, compliance review, and drafting PMIS project requests.
- Upcoming historic structures assessment and treatment projects could inform needed NRHP evaluation updates:
  - Include updated Section 110 documentation and NRHP evaluations for all five CCC Era structures (four buildings and the Entrance Road) in the upcoming HSR update.
  - Include updated Section 110 documentation and NRHP evaluation in the VT Tower Ladder project.
- Coordinate with the Regional Historical Architect to coordinate a visit to the monument in 2019-2020, in order to update and recertify LCS.
- Contact the IMRO Historical Architect regarding the best way to complete an HPG for the CCC Era structures.
- Consult with the park CRM team and the SHPO over the treatment plans in the CCC Era HSR update and VT Tower Ladder project. If the SHPO concurs that the recommended treatments would not be adverse, then this information could be used to define projects that are more likely to be NRHP compliant.
- Ensure that FMSS specialists are trained to consistently enter new treatment plans and treatment work accomplished into the appropriate sections. Consider including this as standard language in project scoping (i.e. "enter treatment recommendations into FMSS").
  - Treatments to historic structures can also be adequately documented through a treatment report (HSR part 3, VT, etc.) and/or PEPC project close-out.
- Upload baseline documents into IRMA: Lingo et al 2004, Richardson 2008, Wegman-French and Brower 1995.
- Ensure IMRO staff are included on the distribution list for completed research and treatment documents.
- Change the Tower Ladder entry in FMSS from an asset of the Tower Trail to its own location. Its historical significance and maintenance needs are unrelated to the Tower Trail.
- In general, alternative technical support may be available from the Historical Architect at Grand Canyon National Park or at VT, upon request.

History Actions

- Hire a permanent interdisciplinary cultural resource professional, at least at the GS-09 level.

- Explore the potential for locating a Western historian with knowledge of the Wyoming/Dakotas/Montana regions through the Organization of American Historians (OAH)-NPS collaboration initiative.
- Ensure the upcoming HRS considers all time periods, social-historical contexts, and resource types represented on DETO. It should incorporate current historiographic methods and priorities, and develop themes of potential interest to visitors. The researcher should assess whether existing local historic contexts are adequate and tie into national and regional trends, contexts, and property types as appropriate.
- Conduct an oral history of Sue Skrove, prepared by a professional historian. Her knowledge of the monument and the local community could be integrated into future Administrative Histories and would provide useful context for interpretive projects, planning and management discussions, etc.
- Upload the NRHP Multiple Property Documentation Form (MPDF), the five NRHP Nomination Forms, and the Tower TCP consensus DOE letter to IRMA.

Museum Collections Actions

- Curation facilities and collection condition:
  - Continue the successful partnership with MORU for managing and storing the park's collections.
  - Complete a CCS through a TAR or a PMIS project. Collaborate with the IMRO Museum Services Program and MORU staff for planning support, and ensure that scope includes identifying procedures critical for preventive conservation.
  - Develop an approach for CCS's at non-federal repositories, possibly in collaboration with other parks.
  - Work with the Midwest Archeological Center (MWAC) and MORU to better define the preventive conservation program currently in place.
  - Ensure that Checklists reflect all collections, including archives, in each curation facility. Obtain information from non-federal repositories about facility conditions and storage needs that can be included in a Checklist.
  - Work with MWAC, WACC, and MORU to ensure that identified deficiencies adversely affecting the collections are included in FMSS work orders, and conversion to the new Department of the Interior (DOI) Checklist includes the participation of Maintenance, Structural Fire, and Law Enforcement.
- Archives survey (initial survey completed July 2018, appraisal is pending):
  - Coordinate with DETO staff to identify which records in the backlog are no longer in immediate use and can be transported to the MORU museum facility.
  - Determine a centralized location for the records remaining at DETO.
  - Ensure that the backlog identified in the archival survey of 2018 is accessioned into the DETO museum collection. This backlog includes the maintenance, resource, and administrative central file records.
  - Conduct a comprehensive risk analysis for the identified archives and determine extent of protective measures that are necessary. Begin developing strategies to mitigate those risks.

- o Develop Checklists for any identified locations of archives on the monument until they can be transferred to MORU (only one Checklist is needed if the records are consolidated into a single room). Use the new DOI format and include Maintenance, Structural Fire, and Law Enforcement in the evaluation.
  - o Seek funding to have an archivist appraise, arrange, catalog and scan archives.
- Non-federal repositories:
  - o Develop and begin implementing strategies to identify and accession, if found, natural history specimens and field documentation (both analog and electronic) in non-federal repositories.
  - o Develop Checklists for non-federal repositories using the new DOI format and including Maintenance, Structural Fire, and Law Enforcement in the evaluation.
- Integrate museum collections into all research projects:
  - o Include provisions and funding for cataloging the resulting objects, specimens, and archives for all project proposals, including those conducted under permit.
  - o Develop a plan to follow up on past Research Permit and Reporting System (RPRS) permits to accession and catalog specimens and archives.
- Integrate museum collections into monument planning and programs:
  - o Museum collections should be better represented in monument planning and management documents. Conduct an analysis to determine how collections may contribute to the monument's purpose, and integrate language as appropriate.
  - o Ensure that museum needs are recognized and included in new or updated planning and management documents, and in PMIS projects.
  - o Explore ideas for integrating collections into interpretive and research programs both inside and outside the monument. To measure current use, develop and implement a procedure to collect statistical data on the use of monument collections across multiple platforms.
- Update the Scope of Collection Statement (SOCS). The 2015 update is current but was not comprehensive.
- Museum documentation:
  - o Complete the inventory of accession and deaccession files so a comprehensive assessment can be made. Develop an incremental strategy to resolve deficiencies.
  - o Identify the extent of corrections needed to complete catalog records lacking required fields. Develop an incremental strategy to resolve deficiencies.
  - o Convene Collections Advisory Committee to deaccession all missing items.
- Archive natural and cultural resource research materials and project files:
  - o Ensure that field notes, photographs, and other byproducts of research on the monument are accessioned into the museum collection, along with the final report. Final reports should also be uploaded to IRMA.
  - o Recover the two Shafer File volumes from the federal records center and accession them into the monument's archives. Museum Services can provide advice and assistance. For more information see Appendix 3, Bibliography, Shafer 1996 (two entries); and Appendix 2, Cultural Anthropology, Documentation #3. Digital copies could be uploaded to the electronic Technical Information Center database (eTIC) if desired.

o Note regarding non-research resource archives (architectural plans, contracts, maintenance records for historic structures, etc.): primary materials should not be sent to the NPS Technical Information Center (TIC) for digitization and uploading, or for storage. TIC staff sends these materials to a National Archives and Records Administration facility (i.e. outside NPS) when they are done, and they are very difficult to retrieve. These materials should be archived into the museum collection first, and final digital copies uploaded to eTIC if desired.

Compliance Actions

- Hire a permanent interdisciplinary cultural resource professional with experience in Section 106 compliance, at least at the GS-09 level.
- The Regional Section 106 Compliance Coordinator (Amy Pallante) should be invited to the biennial meetings with the SHPO, as should other IMRO staff as appropriate given their areas of expertise.
- Identify and prioritize a handful of projects that should be ready to execute in the event funds unexpectedly become available. Consult on these projects as soon as possible, so that if funds suddenly materialize, Section 106 is already complete.
- Develop a process for consulting with Tribes over all projects with the potential to affect Historic Properties regardless of scope or types of properties affected. DETO's practical limitations are understood, including limited time and staffing at the monument and region, and in fact this compliance shortfall is widespread in the region. For support in working out a potential solution, contact Amy Pallante and the IMRO point of contact for park activities concerning associated Tribes (Kim Greenwood).

NAGPRA Actions

- Develop a general inadvertent discovery protocol for the monument. Update it as comprehensive agreements are executed.
- Execute comprehensive agreements with associated Tribes who show an interest, to establish formal procedures for inadvertent discoveries.
- Resolve the discrepancy over potential objects of cultural patrimony in the museum collection.
- Enroll the Chief of RM and incoming Superintendent in NAGPRA training.

GIS Actions

- The updated archeological survey should include (re)establishing boundaries of known sites, and this data should be uploaded to the regional dataset. Coordinate with IMRO GIS staff to ensure that legacy data is migrated to the new geospatial data transfer standards before the survey, and that new data conforms to these standards.
- Submit TAR to IMRO GIS office:
  o Request that staff create a Tower TCP boundary;
  o Request that staff migrate archeological data to current geospatial data transfer standards.
- Update regional dataset with geospatial data from the four sites recorded in 2015.

- Submit a PMIS project to locate or reconstitute survey coverage polygons (at least three surveys) and archeological site locations (20 sites) from all prior archeological projects and upload data to regional geospatial dataset.

Climate Stressors Actions

- Ensure that the results of the ongoing Climate Change Scenario Planning workshop and RSS prioritizations are fully integrated into future planning and management documents, and that cultural resources are fully represented.

Intermountain Region Cultural Resource Stewardship Assessment Concurrence

This Cultural Resource Stewardship Assessment for Devils Tower National Monument has been a collaborative effort between the monument and Intermountain Regional Office staff. The team included:

Rene Ohms, Chief of Resource Management, Devils Tower National Monument

John Valainis, Regional CRSA Coordinator, Intermountain Regional Office

Kim Greenwood, Cultural Anthropologist, Intermountain Regional Office

Tonia Horton, Historic Preservation Program Manager, Intermountain Regional Office

Jim Kendrick, Regional Archeologist, Intermountain Regional Office

Fielding Link, Regional Historical Landscape Architect, Intermountain Regional Office

Zane Martin, Museum Specialist, Mount Rushmore National Memorial

Heidi Ogle, GIS Specialist, Intermountain Regional Office

Amy Pallante, Regional Section 106 Compliance Coordinator, Intermountain Regional Office

Elizabeth Pidgeon, Regional Historical Architect, Intermountain Regional Office

Tef Rodeffer, Museum Services Program Manager, Intermountain Regional Office

Jacquelin St. Clair, Archeologist, Intermountain Regional Office

Rosemary Sucec, Cultural Anthropologist, Intermountain Regional Office

Amnesty Kochanowski   May 21, 2019

APPROVED   Date

Amnesty Kochanowski, Superintendent, Devils Tower National Monument

Cultural Resource Overviews

In order to provide context for the tables, this section contains narrative overviews of the known resources on Devils Tower National Monument, from each of the six cultural resource disciplines.

Archeology

Rock art at the Tower base.

Evidence of prehistoric activity at Devils Tower goes back to the Paleoindian period. A complete chronology for the monument cannot be reconstructed from known sites, but the regional chronology is generally known from research in surrounding areas.

The monument manages 70 documented archeological sites, although erosional processes have revealed many new ones since the last comprehensive surface survey in 1998, so that IMRO archeologists believe there could be upwards of 200 sites. A more refined understanding of both documented and undocumented sites could answer important research questions related to specific activities at the Tower such as the seasonality of occupation, siting significance, etc.

Lithic scatters account for almost all documented prehistoric era sites, and two-thirds of documented sites overall. A few of these are bisected by the CCC Era Tower Trail. These sites are important to archeologists for their data potential, and important to associated Tribes as remnants of their ancestors'

activities. Aside from the lithic scatters are a hearth and two rock art panels on the Tower granite, the latter of which are difficult to discern and consist of amorphous red ochre pigment.

The historic era is represented by the pre-CCC Era Graham Cabin site (no standing structural elements); five graffiti panels, mostly on sandstone outcrops (1891-1930s); miscellaneous CCC Era remnants (trash dump, river control features); the Thurman's Café and cabins site (1930-1965, structures removed after 1965); and various trails, some abandoned and some maintained.

There are no standing ruins in the monument.

The monument does not have an archeologist on staff. IMRO archeologist Jacquelin St. Clair provides essential archeological support, usually once per year or every other year, conducting site condition assessments. Seasonal archeological technicians were hired in 2015 and 2016 to conduct an erosion mitigation project, limited archeological survey (for Section 106), and other tasks. In 2017 the monument executed a five-year interagency agreement with Black Hills National Forest for archeological technician support. This agreement has allowed the monument to fund temporary archeological support as needed, usually for monitoring ground-disturbing projects. Because the Forest Service archeological technician does not meet SOI Professional Qualification Standards, she cannot independently conduct survey projects or author/sign reports and site forms. However, the agreement is important especially for NHPA compliance, and the archeology program at DETO would be significantly impacted if it were to end.

Cultural Anthropology

*Tribal consultation in 2016 over the proposed Accessibility Improvement Program
resulted in representatives from ten Tribes assisting with a survey of the project area.*

For thousands of years, American Indian Tribes in the region have celebrated the Tower in their stories – many call it Bear's Lodge or a variation on that theme – and have traveled there for spiritual purposes. In Lakota cosmology, Bear's Lodge is closely connected with Wind Cave located less than 100 miles away in southwestern South Dakota. Signs of ongoing spiritual practice are evident across the monument, and for this reason it is treated as a landscape-level ethnographic resource. "American Indian Spiritual Values and Opportunities for Personal Reflection" is identified as a FRV in the 2014 Foundation Document.

The monument has 26 associated Tribes, and although its ethnographic landscape has not yet been formally documented, it is managed in regular consultation with tribal partners. No other TAPs have been identified, but neither have there been studies to determine whether any non-tribal groups should be characterized as such. Ranching is an important traditional lifeway elsewhere in the region, and early local settled communities had some pre-monument traditions at the Tower such as the Old Settlers Picnic, which traces its origins to a gathering for a publicity stunt in the summer of 1893. A REAP is recommended to correct this potential knowledge gap: It would evaluate whether any modern groups associated with these lifeways or traditions should be characterized as TAPs, and identify what if any resources on the monument would be culturally significant to them.

A field inventory conducted in 1990 and eventually published as an Overview and Assessment (Hanson and Chirinos 1997) remains a valuable document. The monument sent the draft report to the SHPO for comment, who concurred that "Devils Tower and the surrounding traditional use areas" were NRHP-eligible. This language is slightly ambiguous, but is clarified by a map accompanying the letter which

indicates the "DOE Area" as that bounded by the Tower Trail. Based on Hanson and Chirinos and presumably this SHPO letter, Kathy McKoy also identified the Tower Trail as the TCP boundary in an MPDF, which was approved and signed by the Keeper on July 24, 2000.

It is significant to note that, in the time since Hanson and Chirinos's survey, evidence of traditional spiritual practice has become far more common and visible, so that whereas personal offerings (e.g. prayer bundles, prayer cloths) were considered remarkable in 1990, they are now ubiquitous. This development has been remarked by longtime employee Sue Skrove (Administrative Officer) from personal observations, and an explanation can be teased out of the monument's current Administrative History (Rogers 2008). While personal ritual practices flourish, communal traditions such as the Sun Dance have not been held in years.

Tribal relations are in an excellent state due mostly to concerted efforts starting in 2013 by two Superintendents and the Chief of RM. A consultation in 2016 focused on interest in and procedures for holding future Sun Dances, and staff are currently consulting over new interpretive signage. A term Environmental Protection Specialist was hired in the summer of 2018 to consult with Tribes regarding usage of ethnobotanical resources, and to work on agreements and other compliance requirements related to the NPS Plant Gathering Regulation. Because of these activities and practices, the cultural anthropology program is healthy despite shortfalls with respect to staffing and certain baseline documentation.

Cultural Landscapes

The sweat lodge at the Sun Dance grounds.

Devils Tower National Monument is described in its Foundation Document as a "landscape-level ethnographic resource." The Tower is a sacred place to many American Indian Tribes, and the landscape abounds with evidence of ancient and ongoing spiritual activity.

This ethnographic landscape is one of four cultural landscapes that have been tentatively identified, but none of them has been documented, evaluated, or assessed for condition. The others are the Tower Trail and Red Beds Trail, the CCC Era, and the Mission 66 Administrative Area and Campground landscapes. The entrance road is listed on the NRHP as an individual structure with twenty contributing CCC Era culverts.

The highest priority for cultural landscape management is the Mission 66 Administrative Area and Campground. Mission 66 resources have not been documented or evaluated at any level, as individual structures, a historic district, or a cultural landscape. The Tower Trail and Red Beds Trail CLI will be conducted in 2019, and developing a treatment plan is a priority since it is the highest-use area in the monument. The monument-wide ethnographic landscape could possibly be documented as an interdisciplinary project in conjunction with the IMRO Cultural Anthropology Program and in collaboration with associated American Indian Tribes.

Historic Structures

The Old Custodian's Residence, currently the Ranger's office.

Two primary building styles are represented in the monument: NPS Rustic Style, typically associated with the CCC building campaign, and Mid-Century Modern architecture of the Mission 66 program. All pre-1950 structures have been recorded and evaluated, with six listed in the NRHP: four CCC Era buildings, the Entrance Road (built 1917) with its CCC Era culverts, and the Tower Ladder constructed in 1893 for a publicity stunt (see History overview). The Entrance Road winds up and around half the monument and connects the Entrance Station to three CCC Era structures near the Tower, which comprise the Old Headquarters Area Historic District.

The four listed buildings are mostly in good condition as of 2005. The Entrance Road is in overall good condition but a few of its culverts are fair or poor and need treatment. The monument is attempting to add the road and culverts to the scope of an upcoming HSR update for four CCC Era structures. The Tower Ladder is in poor condition and continues to deteriorate. It was last maintained in 1972, and a second round of restoration is in planning. A VT crew conducted a condition assessment in July 2018 and treatment recommendations are forthcoming.

The Mission 66 resources create a unique management challenge: Mission 66 improvements were based on comprehensive master planning undertaken by landscape architects and building architects as a unified development. They should not be evaluated as individual contemporary historic buildings, but as a comprehensive, designed building program on the landscape. Evaluation of eligibility is based on the NPS Mission 66 Era Resources Cover (2015), which contains criteria for how they are to be evaluated, and how to assess integrity. For this reason, the collective development including roads, structures, and associated resources must be evaluated and maintained as a group as well as individual architectural units. Unfortunately, none of these approximately 18 structures (see Appendix 5) have been recorded, NRHP-evaluated, or had their condition assessed. Inventory surveys must be undertaken for the individual structures, for a potential historic district, and for the cultural landscape. Appropriate treatment plans – an HSR with accompanying HPG for the structures and a CLR for the landscape features – are needed for management of these resources. In the meantime, DETO staff treat all of the

structures as NRHP-eligible pending a formal consensus DOE. This set of Mission 66-related projects is the monument's most critical cultural resource program need.

History
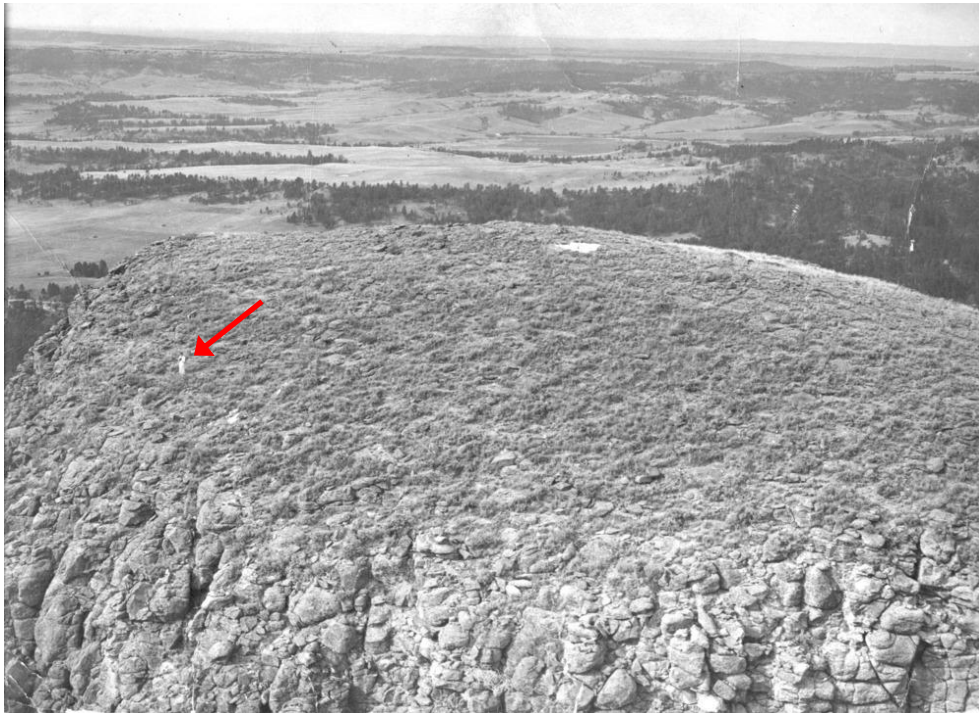
George Hopkins parachuted onto the Tower in October 1941 as a publicity stunt without prior NPS knowledge. The six-day rescue operation made national headlines.

Devils Tower is America's first national monument, created in 1906 by President Theodore Roosevelt under the newly enacted Antiquities Act.

The Tower was within lands ceded to the Sioux Tribe by the Fort Laramie Treaty of 1851, but was outside of the Great Sioux Reservation established by the revised treaty of 1868. Recognizing its uniqueness, the General Land Office denied its preemption under the Homestead Act in response to a claim by Charles Graham in 1890. Interest groups helped keep the land undeveloped, with the exception of the unfinished cabin site that Graham built hoping to "prove up" his claim. Graham's cabin is now a mostly subsurface archeological site.

For thousands of years American Indians had been drawn to the Tower as a place of spiritual importance. White settlers, arriving in significant numbers starting in the late 1880s, were in turn drawn to it as a natural wonder and the Tower quickly became a popular destination for local picnickers and campers. In 1893 two local ranchers climbed to the summit using a hand-built ladder (remains of this Tower Ladder are managed as a historic structure). Their Fourth of July stunt drew around 800 people, and local gatherings at the Tower in late June or early July remained a tradition that in 1932 was organized into the Old Settlers' Picnic. This tradition continued for decades, and the monument hosted a revival of it during centennial celebrations in 2006. From the 1930s onward DETO saw increasing numbers of tourists, weddings on the Tower summit, a stranded parachutist, more recreational rock climbers, and the filming of a Steven Spielberg movie.

The 1990s marked a turning point for management as a result of two developments that came to a head. Whereas American Indian interest in the Tower as a spiritual place never waned, they generally avoided a strong visual presence at the monument, partly for secrecy but also due to discouragement from local communities. However, starting in the mid-1980s and especially by the early 2000s signs of private spiritual practice became much more common, and some traditional communal practices such as the Sun Dance were revived for a time. During this same period, the popularity of recreational rock climbing blossomed: 312 climbers registered in 1973, compared to 5,000 annually in the 1990s. A conflict arose between tribal members who considered it sacrilege to climb the sacred Tower, and rock climbers who saw the Tower as a public geologic feature with world-famous crack climbing routes. The monument explored the issue and implemented its first Climbing Management Plan in 1995, which was largely upheld after a group of climbing guides filed suit claiming the plan was unconstitutional. The development of this controversy is covered in the current Administrative History (Rogers 2008). Managing the Tower both as an important spiritual place and as a climbing destination has been a success, but remains one of the monument's biggest challenges.

The monument has never had an HRS, although one is funded for 2019 so this significant research gap will be remedied. Existing NRHP documentation and published historic contexts are good though outdated.

The most pressing problem for the history program is the lack of a qualified cultural resource professional on monument staff combined with the lack of a Regional Historian at IMRO. The monument needs an NPS-trained historian to guide the interdisciplinary integration of cultural resource research into monument planning, management, and programs. Hiring a cultural resource specialist of any discipline at the monument would mitigate this issue, but the absence of a Regional Historian remains a significant concern.

Museum Collections

Cloth bag donated by an American Indian woman from Colville, WA after she learned the monument was building a visitor's center. She had spent part of her childhood on a reservation and part in a town near the Tower, and remembered attending tribal gatherings there.

The monument collection includes 38,475 objects, over half of which are archeological, and which also include historical, ethnographic, and art objects, as well as biological, paleontological, and geological specimens. The objects are curated in nine facilities: two facilities at MORU, WACC in Tucson, MWAC in Lincoln, and five non-federal repositories. It was thought that the last museum objects remaining at the monument itself were removed in January 2017, but a survey in July 2018 identified archival materials in several locations which must be processed and moved to MORU. Approximately 97% of known collections materials are cataloged, but perhaps two-thirds of catalog records lack information in core fields. Improving these catalog records as well as accession records is critical for accountability and for making information about the collections available to the public.

MORU curates 34% of the monument's collection. Catalog records for all of the collection objects, regardless of location, are managed by a museum specialist there, and she also handles the monument's reporting requirements. This arrangement works well and should be sustained.

MWAC curates 64% of the monument's collection, WACC curates some archival materials, and the rest is curated in non-federal facilities. This includes plant samples and small mammal tissue samples at the University of Wyoming (two separate facilities), University of Minnesota, and Colorado State University.

DETO has partnered with the Hulett Museum and Art Gallery and loans objects on a recurring basis for its Devils Tower display. These objects are related to the monument's more recent history and include a National Park Service sign, two wooden stakes from the 1893 Tower Ladder, and rock climbing

equipment used during early route-setting ascents by famous climbers Fitz Wiessner and Jack Durrance (see Rogers 2008, Chapter 4, for a history of pioneering rock climbers at Devils Tower).

Among the most critical needs for the museum collection are condition assessments. Catalog records indicate that 68.84% of the museum collection is in good or better condition, but most of these assessments have not been revisited since they were originally completed. A comprehensive CCS is needed to determine the actual situation.

Another high priority is preventive conservation strategies. The monument should work with its curation partners to develop museum Checklists for its non-federal repositories, and to improve preservation and preventive care processes and documentation at MORU and MWAC.

Finally, the monument should consider implementing one of its key objectives stated in the Collection Management Plan (CMP), which is to make collections more accessible for research and interpretation by internal and external parties, using a variety of online and real-world platforms. This is a worthy goal that should be pursued if possible, and that should include natural history collections currently held at universities as well as the federally-curated cultural resource collections.

Appendix 1: Cultural Resource Stewardship Assessment Tables

The stewardship information gathered for this CRSA was facilitated through the use of ten assessment tables organized according to individual resource categories and management topics. The tables include:

1. Archeology
2. Cultural Anthropology
3. Cultural Landscapes
4. Historic Structures
5. History
6. Museum Collections
7. Compliance
8. NAGPRA
9. GIS
10. Climate Stressors

Each assessment table includes a series of stewardship indicators and measures to evaluate the monument's cultural resource knowledge, physical conditions and program health. Each measure is assigned a status, trend and confidence level based on the CRSA team's assessment. The table also records a rationale for the assessment and preliminary actions that address identified deficiencies. Data used for the assessment are obtained from multiple sources, including the monument's General Management Plan, Foundation Document, cultural resource baseline documentation and databases, discipline/program annual reports and Servicewide cultural resource inventories.

The assessment tables are used to guide a conversation between monument and IMRO staff. It is important to emphasize that the assessment tables are a tool to record the assessment based on a variety of available information and the collective knowledge of the team members. The tables serve as a coordinating framework that allows multiple programs and individuals to assist the monument in completing the assessment.

Stewardship Indicators

Each CRSA table includes up to eight stewardship indicators, as applicable[*], that represent the fundamental aspects of cultural resource stewardship:

1. Knowledge
2. Inventory
3. Documentation
4. Needs Assessment
5. Treatment Strategies
6. Consultation Practices
7. Maintenance Practices
8. Certified Condition

Treatment Strategies, Maintenance Practices, and Condition are not applied to History; Maintenance Practices and Condition are not applied to the Cultural Anthropology; Consultation Practices are only applied to Compliance and NAGPRA.

Stewardship

Each stewardship indicator includes a series of measures for completing the assessment of cultural resource knowledge, conditions and program health. These measures are both qualitative and quantitative and are drawn from policy, standards and guidelines for NPS cultural resource management. Each CRSA table has a set of required and optional measures for completing the assessment. Not all measures may be applicable to a particular resource. If a measure is not applicable, this is indicated in the rationale associated with the measure.

Stewardship Status, Trend and Confidence

Each stewardship measure is assigned a status, trend, and confidence level based on the CRSA team's assessment:

Status is assessed as:

➢ Significant Concern
➢ Caution
➢ Good
➢ Unknown

Trend is assesses as:

➢ Improving
➢ Unchanging
➢ Deteriorating
➢ Unknown

Confidence is assessed as:

➢ High
➢ Medium
➢ Low

Rationale

For each stewardship measure addressed, the table includes a brief narrative describing the rationale for the status, trend and confidence assigned. The rationale should include data sources, specific references and discipline specialists' knowledge used in making the assessment.

Preliminary Actions

For each stewardship measure addressed, the table includes preliminary actions to address identified deficiencies and improve stewardship. These actions can serve as the basis for the development of key issues, priority resources, comprehensive strategies, and specific projects as part of an RSS.

Overall Stewardship Assessment

An overall assessment of the stewardship status, trend, and confidence is included at the end of each CRSA table. This assessment is based on a combination of the status, trend, and confidence of all indicators and measures considered.

Status

The overall stewardship status is determined by assigning each "Significant Concern" zero points, each "Caution" 50 points and each "Good" 100 points. The average is calculated and applied to the scale below.

Score 0 to 33	Score 34 to 66	Score 67 to 100
Significant Concern	Caution	Good

Trend

The overall stewardship trend is determined by subtracting the total number of "Deteriorating" trends from the total number of "Improving" trends. If the result is 3 or greater, the overall trend is improving. If the result is -3 or lower, the overall trend is deteriorating. If the result is between 2 and -2, the overall trend is unchanging.

Confidence

The overall stewardship confidence is determined by taking the average of the "High," "Medium," and "Low" assigned to each measure.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
Knowledge	1	Information about changes in the environment and culture history are synthesized and efforts to prioritize research needs are outlined in Archeology Overview and Assessment.	Caution	Improving	High	No current archeological Overview and Assessment exists, but the monument-wide survey and report by Molyneaux et al (2000) stands in for one, as it provides a synthesis of all prior archeological studies as well as relevant historical and anthropological studies, and provides field DOEs and management recommendations for all sites known at the time. To some extent it can still inform research questions (i.e. seasonality of occupation sites and interpretation of site location patterns). An IMRO archeologist (J. St Clair) estimates there may be up to 200 total sites on the monument (70 are currently known), newly exposed due to erosion. An updated monument-wide survey is needed.	The TAR for an updated archeological survey was accepted in 2018 and will be conducted by IMRO archeologists over five years. See the "List of Preliminary Actions" section of the CRSA report's executive summary for notes on scope.
	2	Sufficient research is conducted to understand the breadth of archeological resource types at the park and a determination has been made whether or not they are an FRV or OIRV.	Good	Unchanging	High	The first formal archeological study in the monument was in 1962, a systematic site excavation by monument employees. Archeological resources are included in the "Cultural Resources" OIRV in the 2014 Foundation Document. The last archeological survey (1997-98) was comprehensive: it analyzed all prior research (including relevant historic and ethnographic research) and considered all time periods and resource types. There are no obvious knowledge gaps that can be attributed to research bias. A TAR for an updated archeological survey was accepted in 2018 and will be conducted over a five-year period.	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
	3	Percentage of sites with established and reliable date ranges.	**Significant Concern**	**Unchanging**	**Medium**	6% (4/62) of sites in ASMIS. However, 2/3 of known sites are lithic scatters and many of these (as well as others) lack temporally diagnostic materials, so it's possible that this rating could be improved to "Caution." However, there are several sites (Graham Cabin, historic graffiti, carbon-dated rock art) with known date ranges that are not entered in ASMIS.	Review and validate/update ASMIS records.
	4	The threats (environmental stressors and other impacts) to site preservation are understood.	**Good**	**Unchanging**	**High**	Threats are understood by monument managers and planners, and are reflected in ASMIS. The most at-risk sites have recently undergone reassessment and treatment to mitigate damage from high-volume tourism. All 62 ASMIS records include a condition assessment (all date to 2006 or later) and threats/disturbances entries (although 79% were last updated in 1997). The most highly threatened resources (six sites on or directly adjacent to the Tower Trail and climbing access trail) have all had a recent condition assessment (updated in ASMIS in 2017) and their threats/disturbances note some variation on "visitor use" and/or "trail construction." Assessments and treatments are based on recently published archeological investigations. However, the monument does not have a formal, regular condition assessment plan and all but two ASMIS records list "not scheduled" under Inspection Schedule.	Establish a formal, regular condition assessment program. IMRO staff currently assists as available. Work with IMRO staff to determine best mechanism (i.e. combination of IMRO archeologist and interagency agreement?). ASMIS entries should include revisitation schedules for each site. Scope of condition assessment program should include updating assessments in ASMIS, confirming/updating geospatial data for boundaries, updating site form as appropriate, and potentially consulting over DOE if documentation is lacking.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
Inventory	1	Percentage of archeology sites with complete, accurate and reliable ASMIS records.	**Caution**	**Unchanging**	**Medium**	89% (62/70) of sites have ASMIS records, and none of these are missing required fields. Condition, threat, and treatment data seems to be updated based on new studies. Some information is suspect and possibly incorrect: NRHP eligibility statuses for ten entries are either incorrect or not supported by any documentation found during research for this CRSA; five sites have incorrect entries for whether or not subsurface testing was conducted. No records have properly entered bibliographical citations (although the "Remarks" section generally captures the correct references).	Review and validate/update ASMIS records.
	2	Percentage of archeology sites with complete, accurate and reliable state site forms.	**Significant Concern**	**Unchanging**	**Low**	All but four sites have state site forms, but none are final copies with SHPO concurrence, and no other concurrence documentation (i.e. SHPO letter) is on record. The monument is the agency of record for sites on its land, and must maintain complete site forms regardless of whether or not they are also in a SHPO database. It must be assumed that all sites except for four need new site forms and new consensus DOE documentation.	(1) Site forms/DOEs could be updated by: establishing a condition assessment program that updates site records/DOEs as appropriate, or; including this in the scope of the updated archeological survey. (2) Follow up with SHPO on the four recently submitted site forms to obtain official concurrence documentation.
	3	Percentage of park intensively surveyed for archeological resources.	**Caution**	**Deteriorating**	**High**	100% of the monument was surveyed in 1997-1998 (report published 2000). Only one small-scale survey and various revisitations/condition assessments have been completed since then. New sites are known to have been exposed due to erosion, and a new survey of the monument is needed.	The TAR for an updated archeological survey was accepted in 2018 (see Knowledge #1).

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
	4	Percentage of areas with high visitor and/or operation impacts that have been tested (subsurface survey).	**Good**	**Unchanging**	**High**	100% of the monument has been surveyed by a study (Molyneaux et al 2000) that conducted subsurface testing as appropriate. Of 12 sites (all lithic scatters) either directly alongside or bisected by hiking trails, 11 were tested. Six of those that had subsurface testing are in the highest use area - the Tower Trail - and three of these were targeted for reassessment in 2015 and underwent mitigation treatment. The one site that has not been tested (48CK0087) was recommended for no further work by its recorder (Jones 1980) and suspected as natural shatter rather than flakes by Molyneaux et al (2000).	
Documentation	1	Percentage of sites with an on-site assessment of threats and damages (recorded in ASMIS).	**Caution**	**Deteriorating**	**Medium**	89%. All 62 sites in ASMIS (out of 70 total) were given a condition assessment in 1997-98, and all (except the collected isolated find) have a threat/disturbance assessment in ASMIS. All 62 were revisited and assessed by a professional archeologist in 2007 (Molyneaux 2007), and some again after that. However, most of the threat/disturbance entries were last updated in 1997, and only 11 have been updated in 2006 or later (of these, five are in high-traffic areas).	Review and validate/update ASMIS records.

Establish a formal, regular condition assessment program (see Knowledge #4). |

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology						
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).						
	2 Percentage of archeology sites with adequate NRHP nomination documentation.	**Good**	**Unchanging**	**High**	There are no archeological sites on the monument that are determined to need NRHP nomination documentation. 3% (two not eligible sites) are recorded on an NRHP nomination form but it lacks the Keepers signature, although it received concurrence from the SHPO. Only 4/69 archeological sites have a documented consensus DOE (although ASMIS says ten are "officially eligible"; note that the isolated find is subtracted from total count). The 65 need new DOEs unless official SHPO documentation proving consensus DOEs can be located.	
	3 Percentage of archeology sites or districts with DOE documentation.	**Significant Concern**	**Unchanging**	**High**	Only 4/69 archeological sites have a documented consensus DOE (although ASMIS says ten are "officially eligible"; note that the isolated find is subtracted from total count). The 65 need new DOEs unless official SHPO documentation proving consensus DOEs can be located.	Site forms/DOEs could be updated by: (1) including this in the scope of an updated archeological survey, or (2) including this in the scope of a formal condition assessment program
	4 Archeological information is disseminated to park managers, planners, interpreters, and other NPS specialists and uploaded to a digital repository (e.g. IRMA, TIC, Tdar, Park digital library).	**Good**	**Unchanging**	**High**	All seven archeology baseline documents are uploaded to either IRMA or eTIC. Distribution of the actual reports is restricted, but information is made available as needed to managers and planners. NOTE: All archeological reports should be evaluated for their suitability for public availability, and each should have a Certificate of Availability completed for it per ARPA regulations.	Consult with the Regional Archeologist regarding Certificate of Availability for archeological reports
	5 Percentage of archeological assemblages analyzed for articles or exhibits.	**Unknown**				

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
Needs Assessment	1	Archeology resource research and stewardship needs are addressed in PMIS	**Caution**	**Improving**	**High**	The most critical program needs (DOE documentation, ASMIS update) are better accomplished through a TAR. IMRO archeologists are prepared to assist: this measure will be "Good" when TARs are actually submitted.	Submit TARs for DOE and ASMIS updates.
	2	Park has access to an archeologist who meets professional standards (through park staff or an agreement with another park, agency or partner) to advise on resource planning, preservation, and protection.	**Good**	**Unchanging**	**High**	DETO has no archeologist on staff. IMRO archeologists who meet the SOI Professional Qualification Standards assist with planning, project execution, and resource stewardship. The monument also executed an interagency agreement with Black Hills National Forest to fund an archeological technician as needed for monitoring ground-disturbing activities. However, she does not meet SOI Professional Qualification Standards and cannot independently conduct survey or author/sign reports and other documents.	
	3	Planning for actions that might affect archeological resources is preceded by research sufficient to identify and evaluate such resources.	**Good**	**Unchanging**	**High**	Existing studies (20 years old) can still inform Section 106 review, and a TAR for an updated archeological survey has been accepted. In the meantime, resurveying areas of potential effects as part of Section 106 analysis is recommended. The Chief of RM is a key planner, manages the cultural resources program, and heads the Section 106 team. She conducts background research for Section 106 and is proficient in GIS (database is in good shape regarding archeological resources with polygons).	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
	4	Archeological resource needs are adequately addressed in park planning documents.	**Caution**	**Unchanging**	**High**	The state of known archeological resources from the 2007 condition assessment, and the need to execute its recommended mitigation measures, is described in the Foundation Document. The need for a new archeological survey is not explicitly stated.	Ensure that the need for a condition assessment program is including in planning and management documents.
Treatment Strategies	1	Objectives for treating archeological sites, features, and objects are developed and described in an Archeological Management Plan.	**Caution**	**Unchanging**	**High**	No formal, regular management plan exists. However, sites most in need of treatment in the monument have been identified and assessed: Molyneaux (2007) conducted a condition assessment of 62 sites and recommended management actions. Further assessments were conducted in 2010 and 2015, the latter resulting in treatment. An IMRO archeologist conducts site condition assessments as asked/available. DETO experiences high erosion known to impact archeological resources, and FMSS can facilitate cyclical revisitation and mitigation planning/action.	Establish a formal, regular condition assessment program (see Knowledge #4).

Develop management recommendations for at-risk sites. The intent is to improve site condition if possible, otherwise to maintain and monitor site condition in order to protect data potential. |
| | 2 | Archeological resources are preserved and protected by eliminating and avoiding natural and human impacts, stabilizing sites and structures, monitoring conditions, and enforcing protective laws and regulations. | **Good** | **Unchanging** | **High** | No formal, regular condition assessment program exists. Based on past and recent recommendations by qualified archeologists, the monument recently treated several sites along the Tower Trail that are most at-risk from visitor impacts by moving benches (to prevent visitors from wandering through nearby lithic scatters), blocking social trails, and disguising exposed artifacts using some of the abundant natural pine duff in the area. | Establish a formal, regular condition assessment program (see Knowledge #4). |

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
	3	Damages to sites are assessed and treated to ensure in situ preservation and protection.	Good	Improving	High	All 62 sites in ASMIS were assessed and recorded in 1998-99 and reassessed in 2007. A subset of these were treated/mitigated, and a subset received reassessments in 2010 and 2015. Current staff is taking an active approach to assessment and treatment: Condition improved: 45 Condition deteriorated: 8 (5 are 'destroyed' as of 2006) No change: 9 The pictograph sites are deteriorating and should be documented for data recovery.	Create PMIS project to document deteriorating pictograph sites using appropriate technologies.
Maintenance Practices	1	Percentage of known maintained archeological resources included in FMSS.	Good	Unchanging	Low	None of DETO's archeological sites are in FMSS, and it is debatable if any should be. Recreational use trails are in the database (two of which were recorded in archeological surveys), but these are maintained as structures.	Determine if the most at-risk sites - those along the Tower Trail - would benefit from being entered into FMSS. Entering them will add to the database maintenance workload, but might generate cyclical funding for site condition assessment and treatment.
	2	Park staff is aware of law and policy concerning archeology sites; sensitive areas within a park are identified for the management team and supervisors.	Good	Unchanging	High	The Chief of RM understands obligations to restrict knowledge of archeological information, and balances this with the need to share enough data to manage and protect the resources.	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Archeology							
The stewardship assessment for archeology includes 7 indicators and 24 measures; 14 required measures and 10 optional measures (shaded blue).							
Certified Condition	1	Percentage of sites reported in good condition in ASMIS.	**Caution**	**Unchanging**	**High**	68% (42/62), all of which date to 2006 or later.	Develop management recommendations for sites assessed as other than good condition. The intent is to improve site condition if possible, otherwise to maintain and monitor site condition in order to protect data potential. Determine if any of these sites would benefit from being entered into FMSS.
	2	Percentage of Maintained Archeological Resources in FMSS with a Facility Condition Index (FCI) indicating 'good' condition.				N/A: no archeological sites are in FMSS.	
Overall Stewardship Assessment			**Good**	**Unchanging**	**High**		

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Anthropology							
The stewardship assessment for cultural anthropology includes 5 indicators and 18 measures; 12 required measures and 6 optional measures (shaded yellow).							
Knowledge	1	Relationship of the park's ethnographic resources to the cultural context(s) for the park is adequately documented in an Ethnographic Overview and Assessment.	**Good**	**Unchanging**	**High**	The EOA is from 1997 with a 2008 update. The documents are adequate.	
	2	Scope of resources significant to TAPs is understood and a determination has been made whether or not they are an FRV or OIRV. (Resources may include both natural and cultural resources included in other sections of this CRSA.)	**Caution**	**Unchanging**	**High**	Several studies have identified the scope of the resources significant to the monument's TAPs, which are its 26 associated Tribes. Most focus on the Tower, such as the oral histories completed for six Tribes as part of an interpretation project, but the Hanson & Chirinos Overview and Assessment from 1997 is comprehensive. Tribal members also have opportunities to discuss significant resources during regular consultations. There have been no Traditional Use Studies, which would deepen and potentially broaden the monument's scope of knowledge of ethnographic resources and their importance to the Tribes. The Tower as an ethnographic resource is represented in the 2014 Foundation Document as an FRV ("Devils Tower Formation") and again as part of the "American Indian Spiritual Values and Opportunities for Personal Reflection" FRV. Other resources of significance to Tribes, including archeological resources, are captured under the OIRV "Cultural Resources."	Request multiple Traditional Use Studies, perhaps for six Tribes at a time. Determine if the oral histories that were taken for an interpretive project are useful as an ethnographic record, and if so then transcribe the full recordings.

Cultural Anthropology

The stewardship assessment for cultural anthropology includes 5 indicators and 18 measures; 12 required measures and 6 optional measures (shaded yellow).

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Inventory	1	For parks with traditional resource users, the legislative, regulatory, or policy basis for relationships with them is adequately documented in a Traditional Use Study.	Caution	Improving	High	No Traditional Use Studies have been conducted, but the Foundation Document describes the applicable laws and policy. Traditional resource usage is mediated through consultation: the monument consulted with Tribes in 2016 over procedures for holding a Sun Dance, and in 2018 hired a term employee to consult over agreements and compliance vis-a-vis the NPS plant gathering regulation.	Request multiple Traditional Use Studies, perhaps for six Tribes at a time. Ensure that special use permits and compliance requirements for Sun Dances are completed well in advance.
	2	Appropriate studies and consultations document resources and uses, TAPs and other affected groups, and cultural affiliations.	Caution	Unchanging	High	The 1997 EOA remains a valuable document for understanding ethnographic resources in the monument, and is supplemented by subsequent targeted studies of traditional usage of the Tower. The monument has documentation of consultation, associated Tribes, etc. However, no studies have been conducted to assess if there are any TAPs other than the Tribes.	Request a REAP to evaluate traditional connections with local communities (see worksheet).
Documentation	1	Planning documents contain current information on traditional resource users and uses, the status of ethnographic data, and the legislative, regulatory, policy, or other bases for use.	Good	Unchanging	High	Central planning documents heavily emphasize traditional users and ethnographic resources, with accurate information.	
	2	Research results are disseminated to park managers, planners, interpreters, and other NPS specialists and incorporated into appropriate park planning documents.	Good	Unchanging	High	The Chief of RM ensures that research results are disseminated to key staff and incorporated into planning, management, and interpretation.	

Stewardship Indicators	Stewardship Measures		Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Anthropology							
The stewardship assessment for cultural anthropology includes 5 indicators and 18 measures; 12 required measures and 6 optional measures (shaded yellow).							
	3	Resources eligible for the NRHP as TCPs are identified.	**Good**	**Unchanging**	**High**	Several studies have identified cultural significant resources and potential TCPs. The Tower is a TCP through consultation with the Tribes and documented consensus with the SHPO. Other resources have been identified and described, but their status as TCPs is not formally agreed upon (see worksheet for notes on ambiguity of 1993 SHPO letter). All are managed ("avoid") as if eligible resources, and associated Tribes have not voiced concern over this.	
	4	Percentage of TCPs with adequate NRHP documentation.	**Caution**	**Unchanging**	**High**	No NRHP documentation or nomination has been prepared for TCPs or potential TCPs on the monument.	Determine if it would be appropriate to complete an NRHP Nomination Form for the Tower. Clarify with Tribes the status of other ethnographic resources (sweat lodge, Sun Dance grounds, etc.) and determine if formal documentation and nomination is appropriate and desirable. These other ethnographic resources may be contributing features to the Tower TCP or they may be separate.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Anthropology							
The stewardship assessment for cultural anthropology includes 5 indicators and 18 measures; 12 required measures and 6 optional measures (shaded yellow).							
	5	Cultural anthropology reports and publications are disseminated to park managers, planner, interpreters and other NPS specialists and uploaded to a digital repository (e.g. IRMA, TIC, Park digital library) with appropriate restrictions for access to sensitive information.	**Caution**	**Unchanging**	**High**	Distribution and access restrictions are appropriate. Only Hanson & Chirinos 1997 and White 2008 are uploaded to an electronic library. No documents are uploaded to IRMA, which is currently the preferred database for cultural resource research reports per the Cultural Resource Advisory Group (CRAG). Two sets of records relating to development of the first Climbing Management Plan (ref. Judy Shafer 1996 in Appendix 3, Bibliography), including tribal consultation records, were sent to TIC and are now at a federal records center. Digital copies are not available from eTIC. These records are effectively unavailable to the monument.	Upload seven reports to IRMA (see Appendix 3, Bibliography: exclude the Shafer files, and the oral histories unless transcribed). Recover the two Shafer File volumes from the federal records center and accession it into the monument's archives. Digital copies can be uploaded to eTIC if desired.
Needs Assessment	1	Ethnographic resource needs are adequately addressed in the park planning documents.	**Good**	**Unchanging**	**High**	The Foundation Document makes use of ethnographic knowledge, both from formal studies and from direct consultation with associated Tribes. Key planning and management documents such as the Climbing Management Plan also rely heavily on ethnographic knowledge. DETO staff find its General Management Plan to be of limited practical use.	
	2	Park has access to a cultural anthropologist who meets professional standards (park staff or through an agreement with another park, agency, or partner) to advise on resource planning, preservation, and protection.	**Significant Concern**	**Unchanging**	**High**	The monument has support from professional cultural anthropologists at IMRO, but no expertise at the monument or agreements with outside entities to provide dedicated support. The entire monument is an ethnographic landscape and has significant ethnographic resources. Tribal relations represent a significant amount of cultural resource activities.	Hire an interdisciplinary cultural resource specialist with experience in tribal relations.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Anthropology							
The stewardship assessment for cultural anthropology includes 5 indicators and 18 measures; 12 required measures and 6 optional measures (shaded yellow).							
	3	Planning for actions that might affect ethnographic resources is preceded by research sufficient to identify and evaluate such resources.	**Caution**	**Improving**	**High**	Existing research and ongoing consultation practices are sufficient to inform project planning of potential impacts to ethnographic resources. The exception is ethnobotanical resources, for which no study exists. In mid-2018 the monument hired a term Environmental Protection Specialist to work with Tribes on agreements and compliance needs for traditional plant gathering.	No action recommended: this measure will improve to "Good" once the Environmental Protection Specialist has worked on information sharing, plant gathering procedures, and compliance needs with the Tribes.
	4	Percentage of resource management needs for cultural anthropology addressed in PMIS.	**Caution**	**Unchanging**	**High**	No cultural anthropology projects are in PMIS.	Request multiple Traditional Use Studies, perhaps for six Tribes at a time. Request a REAP to evaluate traditional connections with local communities (see worksheet).
Treatment Strategies	1	Guidance for the park's engagement with Tribes and other TAPs is adequately documented.	**Good**	**Unchanging**	**High**	Consultation occurs regularly, although no consultation plan exists. Tribal relations and engagement practices have evolved significantly over the past five years and have proven successful. Given the monument's small size and staff, a formal plan may not be necessary.	Generate an internal continuity document for the monument that describes consultation history and practices, updated as required. This would be valuable for future Superintendents and Chiefs of RM.
	2	Consultation with TAPs is identified during project scoping.	**Good**	**Unchanging**	**High**	The only TAPs identified are the associated Tribes. Face-to-face meetings with Tribes occur once or twice per year. Tribes are involved in Section 106 consultations, and (for example) were engaged to consult over new interpretive signage that will be installed around the Tower. However, see Compliance table for some caveats.	

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Anthropology						
The stewardship assessment for cultural anthropology includes 5 indicators and 18 measures; 12 required measures and 6 optional measures (shaded yellow).						
	3 Park has access to a cultural anthropologist who meets professional standards (park staff or through an agreement with another park, agency or partner) to advise on treatment strategies for identified resources.	Good	Unchanging	High	The monument has support from professional cultural anthropologists at IMRO. IMRO support is sufficient to occasionally provide technical assistance for developing or updating long-term treatment strategies, includes advising over the Climbing Management Plan. However, IMRO staff are not sufficient to help the monument carry out its consultation and general relationship-building activities with the Tribes.	
	4 Systems exist to monitor effects of use on cultural and natural resources and effects of park plans on authorized uses and traditional users.	Good	Unchanging	High	The only managed ethnographic resource is the Tower, which is monitored through the Climbing Management Plan. Other ethnographic resources are not monitored but are "managed" through avoidance and a policy of informing visitors to do the same. Traditional users maintain the sweat lodge as needed, so a formal monitoring program is unnecessary. Based on feedback from the Tribes, the monument has identified a need to develop an SOP regarding cultural offerings.	A monitoring plan will be required for ethnobotanical resources based on the results of upcoming consultations. Develop an SOP for cultural offerings; their protection, documentation, and criteria for removal.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Anthropology							
The stewardship assessment for cultural anthropology includes 5 indicators and 18 measures; 12 required measures and 6 optional measures (shaded yellow).							
	5	Cultural affiliations of museum objects to TAPs are known and documented and, where applicable under NAGPRA, repatriation processes are implemented.	**Caution**	**Unchanging**	**High**	The monument has no known NAGPRA items in its collections according to the MORU curator who manages its catalog. However, WACC records indicate some objects of cultural patrimony potentially in the collection. This discrepancy needs to be resolved. Otherwise, the monument has not conducted summary item consultations or other non-NAGPRA-related consultations to determine affiliations of objects in its collections. Such consultations must be requested by associated Tribes, if desired, and require significant time and funding.	Follow up with WACC and MORU over the discrepancy between their records until the issue is resolved.
Overall Stewardship Assessment			**Good**	**Unchanging**	**High**		

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Landscapes							
The stewardship assessment for cultural landscapes includes 7 indicators and 20 measures; 10 measures are required and 10 measures are optional (shaded green).							
Knowledge	1	Relationship of the cultural landscape(s) to the historic context(s) for the park is adequately documented in an HRS.	**Significant Concern**	**Improving**	**High**	DETO has no HRS.	HRS is funded for FY19. Ensure it includes CLI documentation of Tower Trail and Red Beds Trail landscape.
	2	Percentage of cultural landscapes with a CLR Part 1: Site History, Existing Conditions, and Analysis & Evaluation documenting the cultural landscape's physical attributes, biotic systems, and use that contribute to historical significance.	**Significant Concern**	**Unchanging**	**High**	DETO has no CLRs. The Regional Historical Landscape Architect has identified four potential landscapes: (1) Ethnographic landscape (monument-wide); (2) Tower Trail and Red Beds Trail landscape; (3) CCC Era landscape; (4) Mission 66 Administrative Area and Campground landscape. A CLI of the Tower Trail and Red Beds Trail landscape is funded for 2018-2019.	Request CLRs in PMIS for each landscape, after each has a completed CLI. In some cases a CLR can be completed without doing a CLI first. Consult with IMRO staff to determine if this is appropriate for any of DETO's cultural landscapes.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Landscapes							
The stewardship assessment for cultural landscapes includes 7 indicators and 20 measures; 10 measures are required and 10 measures are optional (shaded green).							
	3	Scope of cultural landscapes is understood and a determination has been made whether or not they are an FRV or OIRV.	**Caution**	**Improving**	**High**	The four records currently in CLI do not reflect the most current assessment of the Regional Historical Landscape Architect regarding the scope of cultural landscapes in the monument. The staff understands that the monument is an ethnographic landscape, and treats it as such. Devils Tower is described as a "landscape-level ethnographic resource" in the 2014 Foundation Document under the OIRV Cultural Resources. However, none of the cultural landscapes in the monument have been documented. Completed CLIs are needed to provide chronologies, physical histories, NRHP evaluations, and characterizations of contributing features that will allow the monument to better understand the scope and significance of its cultural landscapes. A CLI for one of them is funded for 2018-2019.	Submit a TAR to the Regional Historical Landscape Architect to clean up the records in the CLI database. Complete CLIs for the remaining three cultural landscapes.
Inventory	1	Percentage of cultural landscapes with a certified CLI in compliance Section 110 responsibilities.	**Significant Concern**	**Improving**	**High**	0%. Four potential cultural landscapes exist on DETO, but they have not been adequately studied or documented. A CLI of the Tower Trail and Red Beds Trail landscape is funded for 2018-2019.	Request CLIs for the following: (1) Ethnographic landscape (monument-wide); (2) CCC Era landscape; (3) Mission 66 Administrative Area and Campground landscape.
Documentation	1	Percentage of cultural landscapes with adequate NRHP documentation.	**Significant Concern**	**Unchanging**	**High**	None of the potential cultural landscapes have NRHP documentation.	Complete NRHP documentation for cultural landscapes as CLIs are completed.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Landscapes							
The stewardship assessment for cultural landscapes includes 7 indicators and 20 measures; 10 measures are required and 10 measures are optional (shaded green).							
	2	Percentage of cultural landscapes with DOE documentation.	**Significant Concern**	**Improving**	**High**	None of the potential cultural landscapes have DOEs. The upcoming Tower Trail and Red Beds Trail CLI will include a recommended DOE.	Obtain a consensus DOE with the SHPO for the Tower Trail and Red Beds Trail landscape. Consult with the SHPO over DOEs for future CLIs.
	3	Percentage of cultural landscapes, especially fundamental resources vulnerable to damage or loss, with adequate HALS documentation.	**Significant Concern**	**Unchanging**	**High**	No HALS documentation exists. It is known that cultural landscape(s) exist at DETO, but it is unknown if they would require a HALS level of documentation.	Assess the need for HALS documentation based on CLIs as they are completed.
	4	*Percentage of cultural landscape baseline documents entered in IRMA*				*N/A: No cultural landscapes have been documented.*	*Upload completed documents to IRMA.*
	5	*Research results are disseminated to park managers, planners, interpreters, and other specialists and incorporated into appropriate park planning documents.*				*N/A: No cultural landscape research results exist.*	*Distribute cultural landscape research consistent with other cultural resource research. Copies of completed reports should be sent to IMRO and WASO.*
Needs Assessment	1	Park has access to a historical landscape architect who meets professional standards (through park staff or an agreement with another park, agency, or partner) to advise on resource planning, preservation, and protection.	**Caution**	**Unchanging**	**High**	DETO has access to IMRO staff, but no ready access to an historical landscape architect from another monument, partner institution, etc.	Explore the potential for agreements with nearby agencies or universities for historic landscape architect support, as needed.
	2	Cultural landscape needs are adequately addressed in park planning documents.	**Caution**	**Unchanging**	**High**	A CLI and CLR are identified as needs in the Foundation Document, however the specific nature of the monument's needs, considering multiple landscapes, is not addressed.	Update/clarify cultural landscape needs in planning document updates.

Cultural Landscapes

The stewardship assessment for cultural landscapes includes 7 indicators and 20 measures; 10 measures are required and 10 measures are optional (shaded green).

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
	3	Percentage of cultural landscape resource management needs addressed in PMIS.	Significant Concern	Unchanging	High	14% (1/7). There is one project statement: "Complete Cultural Landscape Report and Cultural Landscape Inventory" (PMIS #208113), unfunded and last updated in 2016. This should be modified and broken into two different projects, and other projects added to capture documentation needs for the other landscapes.	Enter projects into PMIS: * CLI for Mission 66 Administrative Area and Campground landscape * CLI for the ethnographic landscape (monument-wide) * CLI for CCC Era landscape * CLR for Mission 66 Administrative Area and Campground landscape * CLR for Tower Trail and Red Beds Trail landscape * CLR for the ethnographic landscape (monument-wide) * CLR for CCC Era landscape
Treatment Strategies	1	Percentage of cultural landscapes with a CLR Part 2: Treatment articulating a treatment strategy for long-term management based on significance, existing conditions, and use.	Significant Concern	Unchanging	High	DETO has no CLRs.	Request CLRs in PMIS for each landscape, after each has a completed CLI. In some cases a CLR can be completed without doing a CLI first. Consult with IMRO staff to determine if this is appropriate for any of DETO's landscapes.
	2	Historical landscape architect is on the park CRM Adviser team to assist in the review of actions requiring compliance with Section 106.	Caution	Unchanging	High	The Regional Historical Landscape Architect is on the CRM Team. However, he provides support to all IMRO parks and has no staff to assist, so there is not always time to adequately review all Section 106 documentation.	
	3	*A record of treatment is completed to document cultural landscape treatment actions.*				*N/A: No cultural landscapes have been documented.*	
Maintenance Practices	1	Percentage of cultural landscapes adequately addressed in FMSS.	Significant Concern	Improving	High	Cyclic maintenance practices and/or treatment recommendations have not been developed or entered into FMSS.	As CLRs are completed, enter treatment information as appropriate into FMSS.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Cultural Landscapes							
The stewardship assessment for cultural landscapes includes 7 indicators and 20 measures; 10 measures are required and 10 measures are optional (shaded green).							
	2	Field personnel have the necessary knowledge, skills, and abilities to perform cultural landscape preservation maintenance work.	**Significant Concern**	**Unchanging**	**High**	No preservation specialists are on staff. In treating historic structures, maintenance staff have demonstrated awareness of HSR recommendations and SOI standards, and incorporate them into SOWs for contracts and routine maintenance work. Similar considerations would be taken for identified landscape elements. However, they do not have formal training.	Ensure maintenance staff (and staff in general) are made aware of associated elements, sites, structures, etc. for cultural landscapes as they are documented. Work with IMRO to develop interim treatment guidance (pending CLRs) and incorporate this into SOWs as required.
	3	Ground disturbance associated with cultural landscape treatment and maintenance is cleared by an archeologist and monitored if necessary.	**Good**	**Unchanging**	**High**	Archeological support is available through IMRO or through an interagency agreement with Black Hill National Forest to monitor ground-disturbing undertakings.	
Certified Condition	1	*Percentage of cultural landscapes certified in good condition in the CLI database.*				*N/A: No cultural landscapes have been documented.*	
	2	Percentage of FMSS locations that are part of cultural landscapes with an FCI in good condition.	**Significant Concern**	**Unchanging**	**Low**	14% (1/7). No cultural landscapes have been documented, and no locations or assets in FMSS are marked as part of a cultural landscape. However, there are seven locations in FMSS that are potentially features of cultural landscapes.	As CLIs are completed, code appropriate facilities in FMSS as part of a cultural landscape.\n\nDevelop CLRs to manage cultural landscape elements and improve their condition.
Overall Stewardship Assessment			**Significant Concern**	**Improving**	**High**		

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Historic Structures							
The stewardship assessment for historic structures includes 7 indicators and 20 measures; 10 required measures and 10 optional measures (shaded grey).							
Knowledge	1	The relationship of the historic structure(s) to the historic context(s) for the park are adequately documented in an HRS.	**Significant Concern**	**Improving**	**High**	DETO has no HRS.	HRS is funded for 2019.
	2	Percentage of historic structures with a complete HSR Part 1: Site History, Existing Conditions, and Analysis & Evaluation documenting the historic structure's physical attributes that contribute to historical significance.	**Caution**	**Improving**	**High**	67% (4/6). Four CCC Era structures have an HSR from 2004, and an update is funded. The Entrance Road and Tower Ladder lack HSRs part 1. VT conducted a condition assessment of the Tower Ladder in July 2018. Mission 66 structures will need an HSR and HPG once they are inventoried and evaluated.	* For the Tower Ladder, an updated eligibility narrative in conjunction with the VT condition assessment can substitute for an HSR part 1. * Request an HSR and HPG for Mission 66 structures once they are inventoried and evaluated.
	3	Scope of historic structures is understood and a determination has been made whether or not they are an FRV or OIRV.	**Caution**	**Improving**	**High**	Daugherty 1984 and Rogers 2008 provide a relevant, general historic background with which to understand monument resources. McKoy's MPDF (2000) defines historic contexts and property types for use in evaluating structures for NRHP eligibility, but does not include a Mission 66 context. The upcoming HRS will provide a historic context for evaluating Mission 66 structures. Historic structures are discussed in the Foundation Document under the broader heading of "Cultural Resources," identified as an OIRV. Historic structures are integrated into the visitor experience through interpretive signs or usage (e.g. Visitor Center).	Conduct an architectural inventory and evaluation of Mission 66 resources, and enter them into LCS. Consult with SHPO over proposed DOEs.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Historic Structures							
The stewardship assessment for historic structures includes 7 indicators and 20 measures; 10 required measures and 10 optional measures (shaded grey).							
Inventory	1	Percentage of historic structures with a certified LCS record in compliance Section 110 responsibilities.	**Significant Concern**	**Improving**	**High**	0%. All pre-1950 historic structures had certified LCS records, but all are now out of tolerance (> 6 years). No post-1950 structures have been recorded and entered into LCS.	* Coordinate with IMRO for LCS update in 2019-20. * Conduct an architectural inventory and evaluation of Mission 66 resources, and enter them into LCS. Consult with SHPO over proposed DOEs.
Documentation	1	Percentage of historic structures with adequate NRHP documentation.	**Caution**	**Deteriorating**	**High**	100% of documented structures have NRHP documentation and are listed. However, this documentation will be outdated in 2020.	Update NRHP documentation for six listed structures.
	2	Percentage of historic structures with DOE documentation.	**Significant Concern**	**Deteriorating**	**High**	0%. Two historic trails lack current DOEs (Tower Trail has not been evaluated under the Mission 66 context, Red Beds Trail is unevaluated). None of the Mission 66 structures have been evaluated for NRHP eligibility.	Conduct an architectural inventory and determination of eligibility for Mission 66 resources, and enter them into LCS. Consult with SHPO over proposed DOEs. Document and conduct a determination of eligibility for the Red Beds Trail and Tower Trail, and enter them into LCS. Consult with SHPO over proposed DOEs.
	3	Percentage of historic structures, especially fundamental resources vulnerable to damage or loss, with adequate Historic American Buildings Survey (HABS) and Historic American Engineering Record (HAER) documentation.	**Good**	**Unchanging**	**High**	No HABS/HAER documentation has been completed. At this time no structure has been identified that warrants this level of documentation.	The VT project could include a recommendation as to whether HAER documentation is warranted for the Tower Ladder.

Historic Structures

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
**The stewardship assessment for historic structures includes 7 indicators and 20 measures; 10 required measures and 10 optional measures (shaded grey).**
	4	Percentage of historic structure baseline documents entered in IRMA.	**Caution**	**Unchanging**	**High**	0% (0/3) are in IRMA.	Upload the following to IRMA: * Wegman-French and Brower 1995 * Lingo et al 2004 (HSR) * Richardson 2008 (CCC Era structures inventory)
	5	Research results are disseminated to park managers, planners, interpreters, and other specialists and incorporated into appropriate park planning documents.	**Good**	**Unchanging**	**High**	Research results are disseminated to all monument employees, including staff and planners.	Ensure IMRO is also sent copies of completed research documents.
Needs Assessment	1	Park has access to a historical architect who meets professional standards (through park staff or an agreement with another park, agency, or partner) to advise on resource planning, preservation, and protection.	**Significant Concern**	**Unchanging**	**High**	Monument has access to IMRO specialists; no ready access to an historical architect from another monument, partner institution, etc.	Alternative technical support may be available from the Historical Architect at Grand Canyon National Park or at VT, upon request.
	2	Historic structure needs are adequately addressed in park planning documents.	**Caution**	**Unchanging**	**High**	Inventory needs are specifically identified in the Foundation Document, but NRHP document updates are not. The Accessibility Improvement Program (AIP) EA (2018) also addresses historic structure needs.	Include documentation updates in updated Foundation Document (or its successor plan/document)
	3	Percentage of historic structure resource management needs addressed in PMIS.	**Caution**	**Unchanging**	**High**	In PMIS: Updated HSR for CCC Era structures; VT Tower Ladder assessment and treatment plan.	Add to PMIS: (1) Mission 66 inventory and evaluation (Sect 110) (2) Mission 66 HSR and HPG

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Historic Structures							
The stewardship assessment for historic structures includes 7 indicators and 20 measures; 10 required measures and 10 optional measures (shaded grey).							
Treatment Strategies	1	Percentage of historic structures with a complete HSR Part 2: Treatment articulating a treatment strategy for long-term management based on significance, existing conditions, and use.	**Caution**	Unchanging	Medium	67% (4/6). Four CCC Era structures have an HSR from 2004, and an update is funded. The Entrance Road and Tower Ladder lack HSRs part 2. However, the Entrance Road will be included in an upcoming HRS update for CCC Era structures, and treatment recommendations for the Tower Ladder are forthcoming as part of a VT project.	Contact the IMRO Historical Architect regarding the best way to complete an HPG for the CCC Era structures.
	2	Historical architect is on park CRM Adviser Team to assist in the review of actions requiring compliance with Section 106.	**Caution**	Unchanging	High	The IMRO Historical Architect is on the CRM Team. However, she provides support to all parks in the region and has no staff to assist, so there is not always time to adequately review all Section 106 documentation.	
	3	A record of treatment is completed to document historic structure treatment actions.	**Caution**	Unchanging	Medium	Treatment actions are captured in maintenance records and in the Long Descriptions in FMSS, but not consistently.	Treatments can be adequately documented in a variety of ways: HSR part 3, VT treatment report, PEPC project close-out, and/or FMSS long description.
Maintenance Practices	1	Percentage of historic structures adequately addressed in the FMSS.	**Good**	Unchanging	High	All currently known historic structures are in FMSS and marked as heritage assets.	Mission 66 structures have not been evaluated for NRHP eligibility. They are already in FMSS: ensure any that are determined eligible are coded as heritage assets. In the meantime, all must be treated as eligible until a consensus DOE finds otherwise.
	2	Field personnel have the necessary skills and abilities to perform preservation maintenance work.	**Significant Concern**	Unchanging	High	There are no historic preservation specialists on staff. Maintenance staff are aware of HSR recommendations and SOI standards, and incorporate these into SOWs for contracts and routine maintenance work, but do not have formal training.	IMRO can assist with choosing vendors for contracted maintenance work to ensure they are qualified.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Historic Structures							
The stewardship assessment for historic structures includes 7 indicators and 20 measures; 10 required measures and 10 optional measures (shaded grey).							
	3	Ground disturbance associated with historic structure treatment and maintenance is cleared by an archeologist and monitored if necessary.	**Good**	**Unchanging**	**High**	Ground disturbance is monitored by an archeologist under the interagency agreement with Black Hills National Forest or by an IMRO archeologist. This rarely occurs in association with historic structure treatment.	
Certified Condition	1	Percentage of park historic structures certified in good condition in the LCS database.	**Caution**	**Improving**	**High**	LCS records are in need of update. Seven out of 14 structures in LCS were considered good in 2005, and almost all of these had been improvements from the previous condition assessment.	Coordinate with IMRO for LCS update in 2019-20.
	2	Percentage of FMSS locations that are part of historic structures with an FCI in good condition.	**Significant Concern**	**Unchanging**	**High**	20% (1/5). Only five historic structures have an FCI code. The rest are assets, not locations (Entrance Road is parent of all culverts, Tower Trail is parent of Tower Ladder).	
Overall Stewardship Assessment			**Caution**	**Improving**	**High**		

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Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
History							
The stewardship assessment for history includes 4 indicators and 16 measures; 12 required measures and 4 optional measures (shaded pink).							
Knowledge	1	Historical contexts and associated properties for the park are described and documented in a current and complete HRS.	**Caution**	**Improving**	**High**	There is no HRS, but one is funded for FY19. The current Administrative History and an MPDF establish historic contexts and property types for monument resources.	An HRS is funded for 2019. Ensure it considers all time periods, social-historical contexts, and resource types represented on DETO. It should incorporate current historiographic methods and priorities, and develop themes of potential interest to visitors. The researcher should assess whether existing historic contexts are adequate and relate to national and regional trends, contexts, and property types as appropriate.
	2	Rationale for the park's establishment and a history of the management of the site are documented in a current and complete Administrative History.	**Good**	**Unchanging**	**Medium**	The Rogers 2008 Administrative History is current and appears to be complete. It is organized chronologically rather than thematically, but interweaves social historiography and stories from local communities throughout time. It includes pre-monument history relevant to modern management (i.e. American Indian cultural connection to the Tower and dispossession from the land around it). Events in the 1990s and early 2000s led to a significant change in the monument's management, and these developments are described (i.e. increased visibility in tribal usage, rock climbing controversy).	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
History							
The stewardship assessment for history includes 4 indicators and 16 measures; 12 required measures and 4 optional measures (shaded pink).							
	3	Research places cultural resources in regional and national contexts, drawing thematic and geographic linkages with other park units and with related external properties.	**Caution**	**Unchanging**	**Medium**	The administrative histories and NRHP documents appear to consider regional and national trends, but are overwhelmingly NPS- and park unit-oriented in developing historic narratives and evaluation contexts. However, this may be unavoidable: DETO became a national monument so soon after the arrival of Euro-Americans in the area that development within its bounds was isolated from state or regional contexts such as homesteading and ranching.	In the upcoming HRS, the researcher should assess whether existing historic contexts are adequate and tie into national and regional trends, contexts, and property types as appropriate.

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
History						
The stewardship assessment for history includes 4 indicators and 16 measures; 12 required measures and 4 optional measures (shaded pink).						
4	Baseline history research is applied consistently for cultural resource management, planning, and operations to support stewardship, public understanding, and community engagement.	**Significant Concern**	**Unchanging**	**Low**	Monument staff understands key aspects of DETO's history and development, and this knowledge seems to inform management decisions and interpretive exhibits and programs (e.g. signage about the Tower Ladder, regional ranching, Old Settler's Picnic, American Indian history). However, without any cultural resource specialist on staff, and without a Regional Historian, it is difficult to assess the true extent to which historical knowledge is represented in leadership decisions. Baseline history research, interpreted by a qualified historian, is inherently interdisciplinary and can serve as the interface between cultural resource knowledge in general and management, resource stewardship, interpretation, visitor use planning, etc. The lack of a cultural resource specialist at DETO raises concerns over potential cumulative effects in programming and resource management from an under-representation of cultural resources by a qualified specialist from any of the disciplines.	Hire a permanent cultural resource specialist. Explore collaboration with OAH to locate a Western historian with knowledge of the Wyoming/Dakotas/Montana regions.
5	Research is conducted by qualified scholars (as per the SOI Professional Qualification Standards), is peer reviewed when appropriate, and reflects the current state of scholarship in relevant historical fields and subfields.	**Caution**	**Unchanging**	**Medium**	Research for baseline documents was conducted by qualified historians. There is no formal process in place for determining whether peer review is necessary (per Director's Order #11B). No IMRO guidance exists, but CRAG is currently working on the issue. Usage of most historic documents on DETO would be limited to internal use for evaluation or resources and treatment: review by IMRO specialists and acceptance by SHPO may suffice.	Consult with IMRO staff when scoping research projects.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
History							
The stewardship assessment for history includes 4 indicators and 16 measures; 12 required measures and 4 optional measures (shaded pink).							
	6	Research contextualizes cultural resources in enduring historical questions and contemporary conversations and creates new connections through powerful and inclusive stories.	**Caution**	**Unchanging**	**Low**	The historic contexts developed by McKoy in 1995-2000 are sound but 20 years old, and may not reflect contemporary historiographic methods and priorities. The current Administrative History (ten years old) seems to cover all of the themes related to known resources in the monument, from archeological to ethnographic to structural. Ideally, the themes explored in baseline history research influence interpretation programs and help create relevancy for visitors, and can reinforce a stewardship ethic. Without a qualified historian at IMRO or the monument it is difficult to confidently assess existing research against contemporary historiographical practices.	Hire a permanent cultural resource specialist. Explore collaboration with OAH to locate a Western historian with knowledge of the Wyoming/Dakotas/Montana regions.
Inventory	1	Cultural resources are inventoried and evaluated in consultation with the SHPO in compliance Section 110 responsibilities.	**Significant Concern**	**Improving**	**High**	One important set of historic structures (Mission 66 Era) lacks Section 110 inventory. The entire monument was surveyed for archeological resources, but the survey is old (field work was 1997-1998) and only 4/69 archeological sites have consensus DOEs on file. Four potential cultural landscapes lack inventory and NRHP evaluation. Ethnographic inventories and evaluations are adequate.	Conduct inventories and evaluations of cultural landscapes and Mission 66 structures, and generate new archeological site forms in order to obtain official consensus DOEs (see respective discipline tables for more details)
	2	Research information is accessioned as part of the park's museum collection.	**Caution**	**Improving**	**Low**	An archives survey was conducted in July 2018, and unaccessioned archival material was identified on the monument. Full results are pending.	Ensure scopes of work for all research projects on the monument, including permitted projects, include accessioning field notes and final reports.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
History							
The stewardship assessment for history includes 4 indicators and 16 measures; 12 required measures and 4 optional measures (shaded pink).							
	3	Percentage of historic properties with adequate DOE documentation.	**Significant Concern**	**Unchanging**	**High**	11% Archeology: 4/69 (1 isolate not counted in total) Historic Structures: 0/20 (six listed structures not counted) Cultural Landscapes: 0/4 Ethnographic: 1/1 (TCP)	* Conduct inventory and evaluation of approximately 18 Mission 66 structures * Document and evaluate the Red Beds Trail * Update the DOE for the Tower Trail to include Mission 66 context * Conduct CLIs to inform DOEs. * Revisit, re-record, and consult with SHPO over archeological sites.
Documentation	1	Percentage of historic properties with current and complete NRHP documentation that is up to date and includes all relevant national, state, and local contexts.	**Significant Concern**	**Deteriorating**	**High**	20% Archeology: N/A (known sites currently do not merit NRHP nomination). Historic Structures: 6/26, but these forms will be outdated by 2020. Cultural Landscapes: 0/4. Ethnographic: N/A (input from Tribes will help determine if NRHP nomination is desired).	* Complete NRHP documentation for Mission 66 structures as part of the inventory and evaluation. * Complete/update documentation for Tower Trail and Red Beds Trail including under Mission 66 context. * Complete NRHP documentation as part of the CLIs.
	2	Percentage of existing DOEs that have not been converted to NR documentation.	**Good**	**Unchanging**	**High**	0%. This applies only to historic structures and cultural landscapes.	
	3	Inventory and evaluation documentation are disseminated to park managers, planners, interpreters, and other NPS specialists and incorporated into appropriate park planning documents and applied in the management of cultural resources.	**Good**	**Unchanging**	**High**	Research results are disseminated to all monument employees, including staff and planners, unless the data is restricted.	Ensure appropriate IMRO staff receive copies of final research reports.

Stewardship Indicators	Stewardship Measures		Status	Trend	Confidence	Rationale	Preliminary Actions
History							
The stewardship assessment for history includes 4 indicators and 16 measures; 12 required measures and 4 optional measures (shaded pink).							
Needs Assessment	4	History baseline documents are entered in IRMA.	**Caution**	**Unchanging**	**High**	3/3 research reports. 0/8 NRHP or DOE documents.	Upload Wegman-French and Brower 1995, McKoy's MPDF, five NRHP nomination forms, and TCP DOE.
	1	Park has reliable access to a historian to advise on resource planning, preservation and protection and the historian(s) meet professional standards.	**Significant Concern**	**Unchanging**	**High**	The monument has no access to a professional historian. There is no position at DETO, and the Regional Historian position at IMRO is vacant.	Explore collaboration with OAH to locate a Western historian with knowledge of the Wyoming/Dakotas/Montana regions.
	2	Planning documents address gaps in the documentation of history and associated historic resources.	**Caution**	**Unchanging**	**High**	The Foundation Document lists as "needs" the Mission 66 evaluations, TCP NRHP nomination, and a CLI (which would inform a DOE), but does not address documentation for archeological resources or updated NRHP documentation.	Include NRHP documentation / DOE update needs in planning documents, including updated Foundation Document (or its successor)
	3	Percentage of needed projects addressing gaps in knowledge regarding the park's history and associated resources in PMIS.	**Significant Concern**	**Unchanging**	**High**	An HRS is in PMIS, funded for FY19. DOEs for Mission 66 resources are not captured in PMIS. DOEs for 3/4 cultural landscapes are not captured in PMIS. DOEs for the Tower Trail and the Red Beds Trail as historic structures (as opposed to a cultural landscape) are not captured in PMIS.	Ensure that DOE/NRHP document updates are completed as part of potential or upcoming projects: * Archeological sites during the updated survey; * CCC Era structures via an upcoming HSR update; * Tower Ladder via an ongoing VT project; * Tower Trail and Red Beds Trail landscape via an upcoming CLI.
Overall Stewardship Assessment			**Caution**	**Unchanging**	**Medium**		

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections							
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).							
Knowledge	1	Percentage of the suite of museum collection baseline documents with current and complete information (including SOCS and CMP).	**Caution**	**Deteriorating**	**Medium**	66%. The monument removed the last of its known museum items from monument facilities in January 2017, significantly changing the number of required baseline documents. However, an archives survey in July 2018 discovered unaccessioned archives in offices and other locations. Two of the three documents, the SOCS and the CMP, are current. However, the 2015 SOCS update was not comprehensive and needs a more robust update. The monument has never had a CCS. Earlier and outdated plans exist for many of the other baseline documents but are no longer needed as long as the newly discovered archives are moved to MORU. If the archives remain, new baseline documents are required and the status of this stewardship measure would drop significantly.	Develop a PMIS project for a CCS. Complete a more robust update of the SOCS. Coordinate with the IMRO Museum Services Program and the MORU Curator to accession recently identified archives and move them to MORU within the next five years.
	2	Museum curator is included in permit review and follow through and informed about park resource projects that may affect collections.	**Caution**	**Improving**	**Low**	The MORU curator receives notice of all permit applications for DETO and has the opportunity to comment. The curatorial responsibilities relating to permitted collections are very thoroughly explained on the research conditions page of DETO's RPRS. However, past research permits have not been followed up on to secure and catalog specimens and archives.	Develop a plan to follow up on past RPRS permits to accession and catalog specimens and archives.
	3	The SOCS for the park is consistently implemented. Items or objects are researched to determine if they are appropriate for inclusion into the collections or archives.	**Caution**	**Unchanging**	**Medium**	The monument has a current SOCS to set collection limits, although it needs a more robust update. The monument has a Collections Advisory Committee to review accessions and deaccessions.	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections							
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).							
	4	Sufficient research and analysis exists to understand the relationship of the park's museum collection and archives to the purpose for the park and the resources it preserves and protects (i.e. objects, natural history specimens, associated field notes, etc.).	Caution	Unchanging	Medium	The relationship of most of the existing collections to the primary purpose of the monument is clear. The challenge is in materials offered for donation to the monument and comprehensively accessioning and cataloging all collections resulting from resource management activities.	Ensure that the Collections Advisory Committee reviews all accessions and deaccessions, including possible donations.
	5	Determination has been made whether or not museum collections are an FRV or OIRV.	Caution	Unchanging	Medium	Museum collections are only briefly mentioned in the 2014 Foundation Document under the more general OIRV component of "Cultural Resources." One sentence states the condition and location of DETO's cataloged collections. There is no discussion of its value or management considerations included in the OIRV analysis.	Ensure that a determination on the value of museum collections is made and explicitly addressed in all updates to monument planning documents as well as new plans.
Inventory	1	Archival and manuscript collections are surveyed and described in the Interior Collections Management System (ICMS) and finding aids are produced.	Caution	Improving	Medium	In FY17, the monument reported a backlog for 1,116 accessioned archives at MWAC. However, until recently (July 2018) the monument has never had an archives survey for analog or electronic records at the monument or records in non-federal repositories, and new unaccessioned materials were discovered. The monument has no current file plan as required by Director's Order 11D, no electronic records conventions including file name criteria or born digital standards, and no digital asset management plan. Some archival collections are cataloged in the Archives Module so finding aids for them are available.	Process and catalog analog and electronic resource management records identified during the recent archives survey. Ensure that all resources projects, including those conducted under permit, include provisions for cataloging the resulting archives. Begin developing the file plan required under Director's Order 11D using the existing archives as a framework.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections							
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).							
	2	Number of assemblages waiting to be accessioned.	Caution	Unchanging	Medium	The CMP recommends immediate accessioning of resource management records in offices and other locations at the monument; an archives survey recently identified unaccessioned materials on the monument, but the results are still being processed. Objects, specimens, and archives collected or produced by some resource management projects, including those undertaken under RPRS permits, are not being accessioned in a timely manner. Past research permits have not been followed up to secure specimens and archives.	Process and catalog analog and electronic resource management records identified during the recent archives survey. Develop and begin implementing strategies to identify and accession specimens and field documentation, both analog and electronic, in non-federal repositories.
	3	Percentage of collections that are cataloged.	Good	Deteriorating	High	97.1% of the known collections are cataloged (FY17 CMR). This number decreased from 100% in FY16, as an additional archives backlog was identified. This figure will decrease further as a result of the July 2018 archives survey.	Ensure that new resource management projects, including permitted activities, include sufficient funding to catalog the resulting objects, specimens, and archives.
	4	Annual physical inventory is completed and submitted according to established procedures.	Good	Unchanging	Medium	The monument submitted museum inventories in 2014-2018; all inventories were complete.	
Documentation	1	Percentage of accession files and deaccession records that are complete with all appropriate signatures.	Caution	Unknown	Low	A comprehensive assessment of the accession and deaccession files to determine completeness has not been undertaken. Archives in accession folders need to be removed. A few deeds of gift and many DI-105s are missing. Five of 286 accession records are incomplete.	Complete the inventory of accession and deaccession files so a comprehensive assessment can be made. Develop an incremental strategy to resolve the identified deficiencies.

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections						
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).						
	2 Percentage of cataloged records with required fields completed in ICMS.	**Significant Concern**	**Deteriorating**	**Low**	32%. The FY17 review of catalog records for the 14 required fields shared by all disciplines indicates a total of 8,271 records, or 68% of the monument's records, are missing information in at least one of the core fields. This percentage varied substantially from the number reported in the FY15 CMP and the FY16 CRSA draft, as the program for identifying deficient records has improved. Each discipline also has unique required fields which have not been evaluated.	Complete an evaluation of the unique required fields in all catalog records to identify the extent of corrections needed. Develop a strategy for completing the updates incrementally.
	3 Furnishings in historic structures are documented in a Historic Furnishings Report (as needed).				N/A: No historic structures have historic furnishings so a Historic Furnishings Report is unnecessary.	
	4 The park employs metrics to document the diverse use of museum collections.	**Caution**	**Unknown**	**Low**	Collections use is likely under-reported. About one-third of the cataloged collection is at MORU and the MORU curator documents all research requests on DETO collections. The monument also relies on statistical data from MWAC and WACC for the Collections Management Report. The CMP has a section on collections use which lists the key objective to make collections more accessible on a variety of platforms such as virtual exhibits, Teaching with Museum Collections, and physical exhibits at the monument and in partner institutions. However, few of these are currently in place and no statistical data about their use is being gathered. Natural history collections at universities are not considered.	Develop and implement a procedure to collect statistical data on the use of monument collections across multiple platforms.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections							
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).							
Needs Assessment	1	Park has access to a curatorial staff or utilize museum professionals who meets professional standards (through park staff or through an agreement with another park, agency, or partner) to advise on resource planning, preservation, and protection.	**Good**	**Unchanging**	**High**	The monument does not have professional curatorial staff and manages curatorial responsibilities as a collateral duty. The monument has a formal arrangement with the MORU curator to provide advice and guidance, complete year-end reporting, and curate their collections. The monument has natural history collections in some non-federal repositories but minimal interaction with curatorial professionals in those institutions regarding collections management.	This arrangement with MORU works well for the monument.
	2	Percentage of collection surveyed for conservation needs.	**Significant Concern**	**Improving**	**Low**	0% of the collection has been included in CCSs. One item mentioned in the CMP as treated through WACC has no records at WACC. DETO collections at MWAC, approximately 64% of the collection, were included in the General Survey in September 2017.	Develop CCS approach with IMRO Museum Services Program staff. This may require submission of a TAR and PMIS project.
	3	Collections and archive needs are recognized and addressed in park planning documents.	**Caution**	**Unchanging**	**Low**	None of the planning and data needs recognized in the monument's CMP or this CRSA are represented in the 2014 Foundation Document. The CMP contains an extensive list of needs in both areas.	Ensure that museum needs are recognized and included in all updates to existing plans as well as new plans.
	4	Management needs for the collections, including object cataloging and conservation, are addressed in PMIS.	**Significant Concern**	**Unchanging**	**Medium**	There are no projects in PMIS to represent needs of collections.	Ensure that all resource management projects, including those undertaken under permit, include costs for cataloging and initial curation. Work with the Museum Services Program and use the CMP to develop PMIS projects that address the entire range of the monument's needs.

Stewardship Indicators			Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections								
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).								
Treatment Strategies		1	Threats to the park's museum collection are identified and addressed through appropriate security and protective measures and outlined in facility and collections care plans (e.g., CMP, Security Survey Fire Protection Survey, Housekeeping Plan, Conservation Plan).	**Good**	**Deteriorating**	**Medium**	No risk analysis for the museum collections has been conducted. Monument museum fire and security surveys have not been completed. The Structural Fire Management Plan is not accompanied by the Museum Fire Protection Plan or the recovery strategy; no Museum Emergency Operations Plan or Evacuation Plan exists. No Housekeeping Plan has been completed. However, the last museum object was removed from the monument in January 2017 and these baseline documents are not required absent collections. An archives survey recently identified new collections materials on the monument, and if these objects are not transferred to MORU then the plans mentioned above will be needed and this stewardship metric will drop significantly.	Conduct a comprehensive risk analysis for the newly identified archives and determine the extent of protective measures that are necessary. Begin developing strategies to mitigate those risks. Coordinate with the IMRO Museum Services Program and the MORU Curator to accession recently identified archives and move them to MORU within the next five years.
		2	Conservation methods for museum objects are applied in a timely manner and by a conservator with appropriate training.	**Caution**	**Unknown**	**Medium**	Because only a general survey of monument collections at MWAC has been conducted, conservation needs for the collections housed at MORU, MWAC, WACC, and non-federal repositories are not known. The records for the one known conservation treatment for a painting through WACC could not be located.	Complete CCSs so the conservation needs are known and can be prioritized. Utilize professional conservators for treatment through the assistance of the Museum Services Program conservation staff.
		3	Specific treatments defined by affiliated groups for the care of objects are followed by the curator and other park staff.	**Unknown**	**Unchanging**	**Medium**	Care and treatment considerations defined by affiliated groups are currently limited to landscape level resources. Repatriation was completed for several ethnographic objects in 1995. Several potential Objects of Cultural Patrimony have been identified in the collection.	

Stewardship Indicators			Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections								
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).								
Maintenance Practices		1	Percentage of facilities storing or exhibiting museum collections included in FMSS.	**Caution**	**Unchanging**	**Low**	100% of monument facilities storing or exhibiting known collections in FY17 are included in FMSS. The last known collections object was removed from the monument in January 2017. However, a recent (July 2018) archives survey identified archival materials on the monument. The results are still being processed and it has not yet been determined if these locations are in FMSS. This will become a moot point once archival materials are moved to MORU, as intended. Non-federal repositories are not included.	Coordinate with the IMRO Museum Services Program and the MORU Curator to accession recently identified archives and move them to MORU within the next five years.
		2	Museum facility checklist accurately reflects current conditions.	**Caution**	**Unknown**	**Medium**	The monument previously submitted a Checklist for all known monument facilities storing or exhibiting collections; in FY17, these facilities met 66.67% of the Automated Checklist Program standards. However, all known collection objects were removed from the monument in January 2017, eliminating the need to complete a Checklist for monument facilities. The presence of archives at the monument was confirmed in 2018, but Checklists for those spaces have not yet been developed. None of the five confirmed non-federal repositories storing or exhibiting collections are included in the Checklist. Non-federal repositories without American Alliance of Museums accreditation should be included in the Checklist. A planned infrastructure upgrade at MORU will improve its ACP rating for FY20.	Develop interim Checklists for facilities housing the newly identified archives on the monument (consolidating them into one location will reduce the need to one Checklist). Convert Checklists for any identified locations using the new DOI format and including Maintenance, Structural Fire, and Law Enforcement in the evaluation. Begin working with non-federal repositories to secure information for Checklists.

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections						
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).						
	3 Preventive conservation program for protecting and maintaining collections and archives is relevant and followed.	**Caution**	**Unknown**	**Low**	Collections are stored/exhibited in nine facilities: two Regional repositories (MWAC and WACC), two MORU facilities, and five non-federal repositories. The Checklist documents preventive care in four facilities. Items in 34% of catalog records are at MORU. The MORU preventive care program may not be fully relevant (CMP documented cabinets stacked three high, fluid specimens stored inappropriately). The MORU facility is slated for an infrastructure upgrade to be completed by November 2019, and the FY20 ACP will reflect improvements. 64% of the collection is at MWAC; their preventive care was not evaluated. Archives at WACC are included in the center's active preventive care program and plans (0.2% of collection). No information is available on preventive care programs in non-federal facilities. Any archives dispersed throughout the monument facilities are largely unprotected and not in appropriate storage containers.	Work with MWAC and MORU to better define the preventive conservation program currently in place. Ensure that Checklists reflect all collections, including archives, in each facility. Collaborate with Museum Services Program staff and MORU staff and continue pursuing funding for a CCS and other core documents to establish the procedures critical for preventive conservation.
	4 Issues identified in the museum property inventory are followed up and Board of Survey completed for missing items.	**Caution**	**Improving**	**High**	The 2014-2017 annual inventories identified two museum items as missing with the search ongoing and one as under investigation. The MORU curator is preparing a deaccessioning package for other items confirmed as missing, but it is not clear if these three items are on that list.	Convene Collections Advisory Committee to deaccession all missing collection items.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Museum Collections							
The stewardship assessment for museum collections includes 7 indicators and 27 measures; 19 required measures and 8 optional measures (shaded orange).							
Certified Condition	1	Percentage of museum collection reported in good or better condition.	**Caution**	**Improving**	**Medium**	Catalog records indicate that 68.84% of the museum collection is in good or better condition, when cataloging occurred over the last several decades. Most of these assessments have not been revisited since they were originally completed, however this percentage has improved from last year, possibly due to new cataloging. A comprehensive CCS is needed to clarify condition.	Develop a PMIS project(s) for CCS for the items at MORU, MWAC, and WACC and improvements recommended in the CMP. Develop an approach for a CCS at one non-federal repository possibly in collaboration with other parks and monuments.
	2	Facilities that store or exhibit museum objects and archives are considered good based on the Checklist.	**Caution**	**Deteriorating**	**Low**	The last known collection object was removed from the monument in January 2017 so no Checklist is currently required for monument facilities. However, an archives survey in July 2018 identified archival materials on the monument but Checklists have not been developed for all of these spaces. Otherwise, nine facilities store monument items, including Regional repositories at MWAC and WACC , and two facilities at MORU. These facilities are considered good based on their Checklists. Checklists are not available from the five non-federal repositories nor do they have American Alliance of Museums accreditation.	Develop interim Checklists for facilities housing the newly identified archives while they are still at the monument (consolidating them into one location will reduce the need to one Checklist). Work with WACC, MWAC, and MORU to ensure that identified deficiencies adversely affecting the collections are included in FMSS work orders and conversion to the new DOI Checklist includes the participation of Maintenance, Structural Fire and Law Enforcement. Begin working with non-federal repositories storing monument collections to obtain information about facility conditions and storage needs that can be included in a Checklist.
Overall Stewardship Assessment			**Caution**	**Unchanging**	**Medium**		

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Compliance						
The stewardship assessment for compliance includes 5 indicators and 8 required measures.						
Knowledge	1	Park Superintendent, Park Section 106 Coordinator, CRM Team members and cultural resource staff have the training needed to carry out their responsibilities in the Section 106 review.	**Good**	**Unchanging**	**High**	Monument staff and IMRO advisors are trained. The monument makes use of the NPS Nationwide PA as appropriate.	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Compliance							
The stewardship assessment for compliance includes 5 indicators and 8 required measures.							
Documentation	1	Park has a clear and recognizable process in place to ensure Section 106 compliance is completed for every project.	**Significant Concern**	**Unchanging**	**High**	DETO has a clear process in place and stakeholder consultation is routinely conducted, early in the planning process when possible. DETO uses PEPC to manage the compliance process. The process is effective with calculated risks. The Section 106 Coordinator is the Chief of RM. She is responsible for conducting the analysis, generating review documentation, and consulting with stakeholders, and attempts to conduct the full process for all projects but is not always able to do so. She is a biologist with no permanent staff who also manages the natural resource program. There is no cultural resource specialist on staff. IMRO programs are not staffed to support/review all Section 106 reviews for over 90 parks. Also, some projects at DETO result from sudden availability of funds with only months between request and execution. She is able to consult with SHPO for all projects, since many fall under the NPS Nationwide PA. However, sometimes there is not enough time to finish consultation with tribes: initial letters must inevitably be followed up by one or more phone calls, and this to 26 different Tribes.	Tribes should be consulted for all projects. Contact the Regional Section 106 Compliance Coordinator (Amy Pallante) and the IMRO point of contact for park activities concerning associated Tribes (Kim Greenwood) to discuss potential solutions. Hire a permanent interdisciplinary cultural resource professional with experience in Section 106 compliance. Determine if it would be appropriate to pursue written agreements with Tribes that identify categories of projects (e.g. no ground disturbance) for which they are willing to receive an annual report rather than case-by-case consultation. For "sudden availability of funds:" prioritize a handful of projects of various cost tiers, and consult on them now. They will be ready to go if funding becomes available, unless the scope or location change.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Compliance							
The stewardship assessment for compliance includes 5 indicators and 8 required measures.							
Needs Assessment	1	Park has a designated Park Section 106 Coordinator and CRM Team meeting the necessary professional qualifications (per pages 4-5 in the NPS Nationwide PA).	**Good**	**Unchanging**	**High**	Section 106 Coordinator: DETO Chief of RM manages the Interdisciplinary Team, conducts Section 106 analysis/review, and generates compliance documents. Amy Pallante (IMRO) provides support. Archeologist: Jacquelin St. Clair (IMRO) provides support. Cultural Anthropologist: Rosemary Sucec and Kim Greenwood (IMRO) provide support. Curator: Tef Rodefer (IMRO) provides support. Historian: No support (IMRO position is vacant). Impact to Section 106 process is not critical. Historical Architect: Elizabeth Pidgeon (IMRO) provides support. Historical Landscape Architect: Fielding Link (IMRO) provides support.	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Compliance							
The stewardship assessment for compliance includes 5 indicators and 8 required measures.							
Treatment Strategies	1	Park Section 106 Coordinator and appropriate CRM Team members are involved in early project planning and scoping when the broadest feasible range of alternatives is available for consideration.	**Significant Concern**	**Unchanging**	**High**	The Chief of RM is the Interdisciplinary Team leader for planning and management as well as the Section 106 Coordinator. She conducts Section 106 analyses and reviews early in the planning process. She is a biologist, which is a liability when a project requires cultural resource technical expertise, but mitigates this by a combination of being familiar enough with existing research on DETO to determine projects that represent a risk to resources, and turning to IMRO staff when technical expertise is required. However, IMRO programs are not staffed to provide support for all Section 106 reviews across all parks in the region, and so most projects inevitably go through scoping, planning, and compliance without being seen by a specialist. DETO's level of knowledge of its resources mitigates this to some extent: archeological survey is complete (though old); GIS database is mostly accurate and useful for analysis; historic structures are either evaluated or treated as eligible pending evaluation; ethnographic studies adequate to identify sensitive resources; and relationships with associated Tribes are good. DETO has an interagency agreement with the Forest Service for archeological support to monitor ground-disturbing activities.	Hire a permanent cultural resource specialist.
	2	The PEPC database is used to document compliance with Section 106 for all projects.	**Good**	**Unchanging**	**High**	PEPC is routinely used.	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Compliance							
The stewardship assessment for compliance includes 5 indicators and 8 required measures.							
	3	Park uses appropriate CRM Team members in the review of projects under "streamlined" and "standard" process and these reviews are entered into the PEPC database	**Significant Concern**	**Unchanging**	**High**	The Section 106 Coordinator is sufficiently trained to know which team members are required based on the scope of the project and resource types potentially impacted. However, IMRO programs are not sufficiently staffed to review most projects. Larger projects (i.e. AIP) list appropriate team members in PEPC, but most projects list only the Section 106 Coordinator and project leader, and sometimes the Superintendent.	There is no clear remedy for this. Hiring a permanent cultural resource specialist would mitigate the issue.
Consultation Practices	1	Park holds an NPS Nationwide PA implementation review and monitoring meeting at least every two years ("biennial meeting") with the appropriate SHPO/Tribal Historic Preservation Officer (THPO).	**Good**	**Unchanging**	**High**	The monument holds these meetings with the SHPO. Tribes are not signatories to the NPS Nationwide PA and so no THPOs attend. DETO conducts separate consultations, once or twice per year, with associated Tribes.	The Regional Section 106 Compliance Coordinator (Amy Pallante) should be invited to the biennial meetings, as should other IMRO staff as appropriate given their areas of expertise.
	2	Park transmits an annual report of all projects using the streamlined review process identified in the NPS Nationwide PA to the SHPO/THPO.	**Good**	**Unchanging**	**High**	DETO submits the required annual report and responds to feedback.	
Overall Stewardship Assessment			**Caution**	**Unchanging**	**High**		

Does the park have or the potential to have cultural items subject to NAGPRA? Indicate Yes or No in the pick list to the right. If yes, proceed with the assessment.						Yes
Stewardship Indicators	**Stewardship Measures**	**Status**	**Trend**	**Confidence**	**Rationale**	**Preliminary Actions**
Native American Graves Protection and Repatriation Act (NAGPRA)						
The stewardship assessment for NAGPRA includes 7 indicators: 10 required measures and 5 optional measures (shaded purple).						
Knowledge	1 Indian Tribes and Native Hawaiian Organizations (NHOs) associated with the park have been identified and the cultural history is understood.	**Good**	**Unchanging**	**High**	Baseline documents have identified 26 associated Tribes. Current EOA (2008) includes (as a second volume) consultation meeting notes capturing persistent issues most important to Tribes.	
	2 Potential for inadvertent discoveries is defined and the park has a comprehensive agreement with Tribes and NHOs that addresses all activities that could result in inadvertent discoveries or intentional excavations of cultural items subject to NAGPRA (Native American human remains, funerary objects, sacred objects and objects of cultural patrimony).	**Significant Concern**	**Unchanging**	**Medium**	Existing research does not discuss burial practices of associated Tribes or assess the probability of burials, but the potential for inadvertent discovery is known through recent tribal consultations. The monument has no published inadvertent discovery protocol, and no comprehensive agreements with Tribes. An archeologist monitors ground-disturbing activities. Project work tempo is low, estimated 15 or so projects per year total, most of them minor maintenance activities that do not include ground disturbance.	Develop a general inadvertent discovery protocol for the monument. Execute comprehensive agreements with interested Tribes to establish formal procedures for inadvertent discovery.
	3 Park Superintendent, Chief of RM, and appropriate resource management staff are knowledgeable about NAGPRA's statutory and regulatory requirements.	**Good**	**Unchanging**	**High**	The Chief of RM has no formal training, but is familiar with the law and published guidance, and has second-hand experience with NAGPRA issues from past jobs. The incoming Acting Superintendent does not have NAGPRA training. However, all ground-disturbing activities are monitored by one of two professional archeologists who are knowledgeable about NAGPRA and inadvertent discovery.	Chief of RM and new Superintendent should enroll in training.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Native American Graves Protection and Repatriation Act (NAGPRA)							
The stewardship assessment for NAGPRA includes 7 indicators: 10 required measures and 5 optional measures (shaded purple).							
Inventory	1	Park collections have been reviewed and assessed for the presence of cultural items subject to NAGPRA.	**Caution**	**Unchanging**	**Medium**	Monument collections have been inventoried. No NAGPRA inventory items are known. MORU records show no NAGPRA items at all, but WACC records indicate potential objects of cultural patrimony in the collections.	Resolve the discrepancy over the potential objects of cultural patrimony in the collection.
	2	New collections are reviewed and assessed for the presence of cultural items subject to NAGPRA.	**Good**	**Unchanging**	**High**	Yes, before any accessioning action	
Documentation	1	Appropriate notices (Notice of Inventory Completion, Notice of Intent to Repatriate, Notice of Intended Disposition) have been/are published as required.	**Good**	**Unchanging**	**High**	Yes	
	2	Written Plans of Action are developed after inadvertent discoveries of cultural items subject to NAGPRA and before projects that may result in the intentional excavation of cultural items subject to NAGPRA.				N/A: no inadvertent discoveries have occurred after 1990.	Execute comprehensive agreements with Tribes to establish procedures for inadvertent discovery that include a written Plan of Action that could be used for any inadvertent discovery inclusive of ARPA-permitted activities.
	3	Unclaimed cultural items subject to NAGPRA recovered from inadvertent discoveries or intentional excavations after Nov 16, 1990 are documented on an ongoing basis.				N/A: no NAGPRA items recovered after 1990	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Native American Graves Protection and Repatriation Act (NAGPRA)							
The stewardship assessment for NAGPRA includes 7 indicators: 10 required measures and 5 optional measures (shaded purple).							
	4	Archeological faunal remains recovered during past projects have been fully described to ensure all Native American human remains have been identified.				N/A: no faunal remains recovered	
	5	Park archives maintain pertinent NAGPRA information (inventories, published notices, documentation of claims).	**Good**	**Unchanging**	**High**	Records of 2005-2006 repatriation are kept.	
Needs Assessment	1	Park has on staff or has access to a cultural anthropologist or tribal liaison to assist with NAGPRA.	**Good**	**Unchanging**	**High**	The monument has access to an IMRO NAGPRA Coordinator for assistance, as well as to qualified cultural anthropologists and tribal liaisons at IMRO.	
Treatment Strategies	1	Percentage of cultural items subject to NAGPRA that have been repatriated.	**Caution**	**Unchanging**	**High**	100% of known items were repatriated in 2005-2006, according to MORU records. However, WACC records indicate objects of cultural patrimony in the collection. This discrepancy needs to be resolved.	Resolve the discrepancy over the potential objects of cultural patrimony in the collection.
	2	Cultural items subject to NAGPRA that are held in trust for Tribes or NHOs are handled and treated according to the wishes of the Tribes or NHOs.				N/A: no cultural items in the collection are held in trust.	
Consultation Practices	1	Consultation occurs on a government-to-government basis with lineal descendants, Tribes, and NHOs when/as required.	**Good**	**Unchanging**	**High**	Face-to-face, government-to-government consultation occurs once or twice annually with associated Tribes, some of whom may be affiliated with NAGPRA items, to discuss a variety of issues and for relationship-building.	
Certified Condition	1	Reporting to Chief, Park NAGPRA Program is completed annually and as needed.	**Good**	**Unchanging**	**High**	Zane Martin, museum specialist at MORU, manages the collections catalog. She completes this report annually.	

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Native American Graves Protection and Repatriation Act (NAGPRA)						
The stewardship assessment for NAGPRA includes 7 indicators: 10 required measures and 5 optional measures (shaded purple).						
Overall Stewardship Assessment		**Good**	**Unchanging**	**High**		

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Geographic Information Systems (GIS)							
The stewardship assessment for GIS includes 4 indicators and 6 required measures.							
Knowledge	1	Cultural resource research, inventory, and documentation efforts are completely and accurately captured in GIS.	**Caution**	**Unchanging**	**High**	Known existing resources are captured as polygons in monument, regional, and enterprise datasets, but not completely. Monument staff uses GIS data in project planning and analyses as appropriate, including for Section 106 review. A mechanism exists to feed new data to regional GIS database managers, but was not completed for four sites discovered in 2015.	Add missing archeological (20 sites), ethnographic (one TCP), and survey coverage (three surveys) polygons to regional datasets.
Documentation	1	Percentage of cultural resource sites, structures, features and landscapes that have boundary and feature spatial data meeting the cultural resource spatial data standards and are included in the cultural resource enterprise GIS data set.	**Caution**	**Unchanging**	**High**	73% (64/88). Data needs to be field verified. 16 previously discovered archeological resources have no GIS data (although some may be Local Resource Types), and four recently found sites have GIS data maintained at the monument but not elsewhere. The one known TCP does not have associated GIS data set apart as restricted cultural resource data (the TCP boundary is the Tower Trail). No GIS polygons exists for survey coverage from three prior large-scale archeological surveys.	Add missing archeological (20 sites), ethnographic (one TCP), and survey coverage (three surveys) polygons. Field-verify existing archeological GIS data, or re-record as part of a new survey. Submit site boundary data to regional dataset. Submit a TAR to IMRO GIS office to migrate archeological data to geospatial data transfer standards.
	2	Park Atlas is up to date and accurately shows the distribution, nature and extent of cultural resource sites, features and landscape inventory activities.	**Caution**	**Unchanging**	**High**	The Park Atlas reflects the same data as found in the regional GIS datasets. The Chief of RM is trained in GIS and so uses ArcMap rather than Park Atlas for analysis.	Update GIS databases; feed into Park Atlas.

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Geographic Information Systems (GIS)							
The stewardship assessment for GIS includes 4 indicators and 6 required measures.							
	3	Park cultural resource legacy data is included in a maintained geographic information system.	**Good**	**Unchanging**	**High**	The monument's dataset is generally in good shape, and it is not missing much. Legacy data is included in datasets at the monument and regional level, although it is not complete and not field-verified. There is an established system (shared folders) for incorporating new GIS data into regional sets, although the monument has not used this for data collected in 2015. There are currently no plans for updating or field-verifying GIS datasets.	Add missing archeological (20 sites), ethnographic (one TCP), and survey coverage (three surveys) polygons. Field-verify existing archeological GIS data, or re-record as part of a new survey. Submit site boundary data to regional dataset.
Needs Assessment	1	Park has access to a GIS specialist who has experience with cultural resource data standards and a clear understanding of the laws and policies that govern the treatment of sensitive/FOIA exempt information.	**Good**	**Unchanging**	**High**	The Chief of RM is proficient in GIS, and has adequately restricted sensitive data. DETO also has recourse to Heidi Ogle at IMRO for GIS support, if needed.	
Maintenance Practices	1	Park is able to update and refine the data systems that are used to catalog and display the distribution, nature, and extent of cultural sites, structures, features and landscapes.	**Significant Concern**	**Unchanging**	**High**	The monument does not have sufficient staffing to update or improve its GIS database. IMRO could assist with certain technical aspects of update and improvement, but is not staffed to extract original locational data from survey reports (for missing polygons) or to field-verify data.	Ensure that verifying/updating known site boundaries and uploading data to regional geospatial dataset is included in the scope of the upcoming updated archeological survey. Coordinate with IMRO GIS staff to ensure that preliminary migration of legacy data to current geospatial data transfer standards is completed first.
Overall Stewardship Assessment			**Caution**	**Unchanging**	**High**		

Stewardship Indicators	Stewardship Measures		Status	Trend	Confidence	Rationale	Preliminary Actions
Climate Stressors							
The stewardship assessment for climate stressors includes 4 indicators and 10 required measures.							
Knowledge	1	Park has current climate projections to assess potential impacts to the park's cultural resources.	**Good**	**Improving**	**High**	Yes, the monument is currently conducting a Climate Change Scenario Planning project, conducted in conjunction with an RSS, which will develop strategies for dealing with these potential resource-specific impacts. Also, Gonzalez (2013) published a one-page data sheet of past climate trends at DETO (1901-2002) and projections out to 2100. Short studies have also been published targeted at impacts to visitation (Fisichelli & Ziesler 2015) and general exposure to climate change effects (Monahan & Fisichelli 2014) at DETO.	
	2	Environmental influences affecting the stability of sites, structures, features and landscapes (including places or resources important for traditionally associated groups) are understood.	**Good**	**Unchanging**	**High**	All documented cultural resources have general threat and disturbance assessments (entered into ASMIS and LCS), and some of these threats are identified as climate change stressors. An RSS is underway, and environmental stressors and climate change planning are fully integrated.	

Stewardship Indicators		Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Climate Stressors							
The stewardship assessment for climate stressors includes 4 indicators and 10 required measures.							
Documentation	1	Percentage of cultural resources with an on-site assessment of threats and damages due to climate change.	**Caution**	**Unchanging**	**High**	0%, specific to climate change. However, all documented resources have threats and disturbances identified, and based on on-going scenario planning monument staff can predict how of these current threats and disturbances may change as a result of climate change projections. 100% of monument lands have been surveyed for archeological and ethnographic resources, and all historic structures are either evaluated or treated as eligible pending evaluation. Cultural landscapes have not been documented and characterized. This measure is rated "caution" because the potential impacts of climate change on documented resources is understood well enough to take mitigating action as needed, but not all resources are documented and many are in need of a threats/disturbances and condition assessment update.	Resource documentation needs are addressed in the appropriate discipline tables.

Stewardship Indicators	Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Climate Stressors						
The stewardship assessment for climate stressors includes 4 indicators and 10 required measures.						
2	Potential effects from climate change on the park's cultural resources are adequately described.	Good	Improving	High	Climate change scenario planning is underway. Climate-related threats to prehistoric archeological sites and ethnographic resources include increased erosion, direct fire impacts, and visitor use impacts. Threats to historic structures include fire, projected increased pest damage, and increased exterior maintenance needs. Erosion and visitor use have been identified (in that order) as the top threats/disturbances to archeological sites and structural deterioration and weather as the top two for structures. Climate change projections for DETO show a "very strong" correlation between temperatures and visitor use, with higher temperatures probably resulting in more visitors. The four most likely climate change scenarios would all potentially cause more erosion. Archeological site condition assessments have previously been updated on an ad-hoc basis, but the assessments are now being done on a rotating schedule by an IMRO archeologist (under a TAR) so that each site is assessed every five years. Threats to CCC Era historic structures will be identified in a 2019 HSR update, but are not regularly tracked under a long-term monitoring plan.	
3	Research results are disseminated to park managers, planners, interpreters, and other specialists and incorporated into appropriate park planning documents.	Good	Unchanging	High	Research results are disseminated to all monument employees, including staff and planners.	

Climate Stressors

Stewardship Indicators			Stewardship Measures	Status	Trend	Confidence	Rationale	Preliminary Actions
Climate Stressors								
The stewardship assessment for climate stressors includes 4 indicators and 10 required measures.								
Needs Assessment	1		Park has access to cultural resource professionals who understand the scientific bases of climate change and its connections to cultural resources and are able to guide a response to emergency or climate events.	Caution	Unchanging	High	The monument does not have access to a climate change professional who specifically specializes in cultural resources, but general climate change experts are available in the NPS Climate Change Response Program in Fort Collins, and IMRO staff in the Climate Change / Landscape Conservation Cooperative office are also available for assistance. The monument also has access to IMRO cultural resource staff with varying degrees of specific climate change expertise. The monument has Subject Matter Experts (SMEs) to assist with climate forecasting at the National Weather Service office in Rapid City, and requests spot weather forecasts during special events, prescribed fires, etc. In the event of emergencies, the monument has additional resources that can be called for assistance (law enforcement staff from other parks, local emergency and fire response teams, etc.).	
Treatment Strategies	1		An adaptation strategy exists that considers climate impacts to the park's cultural resources.	Good	Improving	High	Yes, Climate Change Scenario Planning is under way and at-risk cultural resources are being identified as part of this process. Prioritization for action is part of the concurrent RSS.	
	2		Treatments to address threats introduced by climate change are implemented.	Good	Unchanging	High	Climate change for the most part is predicted to exacerbate existing threats on monument resources. These threats are treated by the monument. The 2019 HSR update will incorporate climate change treatment strategies for the CCC Era historic structures	

Stewardship Indicators	Stewardship Measures		Status	Trend	Confidence	Rationale	Preliminary Actions
Climate Stressors							
The stewardship assessment for climate stressors includes 4 indicators and 10 required measures.							
	Park cultural resources are adequately addressed in energy efficiency planning for sustainable management.	3	**Good**	**Unchanging**	**High**	DETO is a Climate Friendly Park (CFP), and the Chief of RM participated in the CFP workshop. Cultural resources are incorporated in the Modified Environmental Management System Plan, and energy efficiency in the CCC Era historic structures is being addressed in the 2019 HSR update.	
	Park coordinates with partners to share, learn from, and adapt approaches to managing cultural resources in relation to climate change.	4	**Good**	**Unchanging**	**High**	Yes, the monument is directly engaged with NPS climate change experts for local scenario planning.	
Overall Stewardship Assessment			**Good**	**Improving**	**High**		

Appendix 2: Cultural Resource Stewardship Assessment Worksheets

This appendix contains the eight worksheets used to initially gather stewardship information which was then used to inform the CRSA tables. Two tables, Museum Collections and NAGPRA, do not have associated worksheets due to the way in which their information is gathered:

1. Archeology
2. Cultural Anthropology
3. Cultural Landscapes
4. Historic Structures
5. History
6. Compliance
7. GIS
8. Climate Stressors

Archeology Worksheet

Knowledge

1. **Does the park have an Archeological Overview and Assessment?**

   No, but the Molyneaux 2000 survey report has stood in for it.

   a. **Title:**

   "The Archeological Survey and National Register Evaluation of Devils Tower"

   b. **Date:**

   Molyneaux et al 2000

   c. **Is the AOA up to date and does it cover all necessary historic contexts?**

   This survey report is old. However, it provides a comprehensive literature review, evaluation of past research, 100% survey of monument, in-depth evaluation/re-evaluation of resources, and predictive analysis.

2. **List survey reports that are considered current and applicable.**

   Molyneaux 2000 is old but is still applicable as it provides a good, comprehensive baseline for understanding the entirety of the monument's archeological resources.

   a. **Is the culture history of the park area well understood and documented?**

   Yes, but more research is needed to refine and update what is known, and answer further research questions.

   b. **Do planning documents (GMPs or Foundation Documents) identify archeology as an FRV or OIRV?**

   Indirectly as an OIRV, as part of "Culture Resources" (archeological resources are included in the narrative).

3. **What percentage of sites have reliable date ranges in ASMIS?**

   6% (4/62). The four with entries are reliable; the rest only state 'historic' or 'prehistoric.' A significant number are lithic scatters with no diagnostic materials, but some sites (i.e. Graham Cabin, historic graffiti, carbon dated rock art) have reliable dates that are not entered in ASMIS.

4. **ASMIS sites list stressors and threats adequately.**

   Yes. All 62 records include a condition assessment and threats/disturbances entries. All condition assessments date to 2006 or later (11 are from 2017). Most (79%) of the threats/disturbances entries are from 1997. The most threatened resources (six sites along the Tower Trail) have had a recent condition assessment (updated in ASMIS in 2017) and their threats/disturbances note some variation on "visitor use" and/or "trail construction" and were updated in 1997 (2), 2010 (3), or 2017 (1). However, the monument does not have a formal, cyclical condition assessment plan and all but two ASMIS records list "not scheduled" under Inspection Schedule.

Inventory

1. **List ASMIS records for park.**

   62/70 sites have ASMIS records. Some ASMIS entries were updated last year (2017) as a result of condition assessment activity.

   a. **What percentage of sites have ASMIS records?**

      89%

   b. **Are the records complete and reliable?**

      For the most part. ASMIS reports only return 56/62 of the entries, all of which have all required fields filled out (the other 6 are presumably local resource types). All 62 ASMIS records are missing properly entered bibliographical citations (although the "Remarks" section generally captures the correct references). Some information is suspect and possibly incorrect: NRHP eligibility statuses for ten entries are either incorrect or not supported by any documentation found during research for this CRSA; five sites have incorrect entries for whether or not subsurface testing was conducted.

   c. **Do the sites have state forms?**

      Yes. 66/70 are in Molyneaux et al 2000, Vol.3, but no final, formal copies are on record. Four new sites were recorded on state forms and submitted to the SHPO in 2015.

2. **How much of the park has been surveyed?**

   100% in 1997-1998, and additional small-area surveys since then (including 2015-2016).

3. **How much of the surveyed area is in administrative areas or high visitor impact areas?**

   The entire monument has been surveyed, including these areas. The area of highest visitor impact – the Tower Trail – has been survey multiple times, including a recent targeted assessment of this area as part of an erosion prevention study (Rizzi and Ohms 2015).

Documentation

1. **How many sites have been assessed for NRHP eligibility (DOEs)?**

   4/69 archeological sites have a documented consensus DOE (isolated find is not counted here).

   All 70 archeological resources have at least a field assessment (Molyneaux et al 2000, Rizzi 2015). Rizzi's four assessments were originally unevaluated/not enough data, but were updated and submitted with a recommendation of "eligible." ASMIS indicates 11 have official DOEs but no supporting documents could be located (10 eligible, 1 not eligible): one is an isolated find which is generally considered officially not eligible by default, but without documentation the other ten must be considered unevaluated. Four sites that are not in ASMIS have a SHPO letter with official DOEs (4 not eligible).

2. **List archeology reports in ASMIS - what is the distribution list?**

    None of the 62 records has properly entered bibliographic short-form citations. However, spot checking revealed that most (if not all) have the correct survey reports and pertinent notes captured in the Bibliography/Remarks box.

    Distribution of archeological reports is restricted to the Chief of RM, the Superintendent, and the Chief Ranger (for ARPA and law enforcement purposes). There are currently no cultural resource specialists at DETO, although in the past (and again starting this FY) there has been a temporary or term staffer in Resource Management, usually an archeological technician or environmental protection specialist. Reports are shared with temporary/term cultural resource staff or archeologists who are conducting studies on the monument as needed.

    All archeological reports should be evaluated for their suitability for public availability, and have a Certificate of Availability (per ARPA regulations) completed.

3. **What percentage of artifacts have been analyzed for use in articles or exhibits?**

    Artifacts are available for study or exhibit by request through DETO staff to their curator at the MORU repository.

Other

1. **How many sites are in FMSS?**

    None of DETO's archeological sites are in FMSS, and it is debatable if any should be. Recreational use trails are in the database (two of which were recorded in archeological surveys), but these are maintained as structures.

    For context: 66% of sites are artifact/lithic scatters; there are two rock art panels and five historic graffiti sites; no structural remains of Thurman Café (48CK1714) although some landscaping elements (ornamental trees) remain; the remains of Graham Cabin (48CK0084) are significant to the history of the national monument itself but are almost entirely subsurface; and the Tower Ladder is managed as a historic structure rather than an archeological resource and is in FMSS.

2. **Does park planning consider and direct the management of archeology sites, features and collections?**

    The Foundation Document incorporates the data and recommendations from the 2007 site condition survey as part of its broad discussion of "Cultural Resources" as an OIRV. The document does not mention specific needs (new survey, updated documentation). DETO planners consider archeological resources in their decision-making.

3. **Is there an archeologist at the park? If not, is there an archeologist at another park or in the Regional Office who reviews actions for Section 106 compliance?**

    There is no archeologist on staff. IMRO archeologists who meet SOI Professional Qualification Standards assist with planning, project execution, and resource stewardship. The monument also executed an interagency agreement with Black Hills National Forest to fund an archeological technician as needed for monitoring ground-disturbing activities. However, she does not meet SOI

Professional Qualification Standards and cannot independently conduct survey or author/sign reports and other documents.

Cultural Anthropology Worksheet

Knowledge

1. **Has ethnographic research been conducted at the park?**

   Yes.

2. **Has the park identified culturally associated Tribes and other TAPs as defined by NPS Management Policies (2016:159)?**

   Yes: the monument has identified 26 traditionally associated Tribes. Historical research has identified activities by local communities at the Tower predating the monument's establishment. No ethnographic studies have been conducted to explore whether any descendant groups should be characterized as TAPs, but nor have any such groups engaged with the monument.

3. **Has the park identified other groups and communities which have a social or cultural connection with the park historically or currently?**

   Local communities, especially Hulett, have historic and recent connections with the Tower. Monument staff have attempted to strengthen these local connections by, for example, reviving the Old Settlers Picnic for its centennial celebration in 2006.

   Rock climbers and climbing organizations have important connections with the monument. Euro-Americans have climbed or attempted to climb the Tower since 1893, but only in the late 1980s and especially the 1990s did recreational climbers become a major presence. A 1993 REAP was conducted to understand monument usage by and conflict between climbers and associated Tribes, which resulted in the first Climbing Management Plan. Climbers have a recent (as opposed to generational) connection to the Tower, do not incorporate it into a group identity, and do not transmit traditions about it across generations. Claims that climbing is a spiritual activity – asserted by plaintiffs suing DETO in the mid-1990s – were rejected by the courts. For this reason climbers are characterized as a "collective" (a technical term, as opposed to a "cultural community" or a TAP) with connections to the monument.

4. **Have ethnographic resources been identified through appropriate cultural anthropology research? (Ethnographic resources include natural resources, plants, landscapes, views, places, sites, buildings, and other cultural resources including museum objects, historic structures, and archeological sites and resources.)**

   Yes (e.g. Hanson & Moore 1993, Hanson & Chirinos 1997, Harkin & Chapman 2008). The Tower is a TCP, and other ethnographic resources associated with Tribes have been documented. There are no studies that explore the potential existence of non-American Indian TAPs and what, if any, ethnographic resources would be associated with them.

5. **Is the relationship of the park's ethnographic resources to the park's historic context(s) understood through an appropriate level of research? (List applicable publications.)**

   Yes. The monument does not have an HRS. Its historic contexts for the historic era (as opposed to the pre-contact era) were established by Kathy McKoy, an NPS historian, in an MPDF (2000). She begins with a description of the Tower as a TCP, drawing on Hanson and Chirinos (1997), whose study focused exclusively on associated Tribes. Hanson and Chirinos do not establish formal historic contexts, but do describe the monument's known ethnographic resources in appropriate cultural

contexts. New research would be required to determine whether there are non-American Indian TAPs associated with the monument, which (if any) resources would be associated with them, and whether existing historic contexts are sufficient to understand them. For example, if the Tower and Tower Ladder were considered ethnographically associated with local communities because of the pre-monument tradition of gathering at the Tower in the summer (the Old Settlers Picnic supposedly traces its origins to an 1893 publicity stunt involving the first known summit of the Tower), then McKoy's "Recreation and Tourism at Devil's Tower National Monument, 1880s-1950" historic context might apply.

6. **Has the park completed baseline Ethnographic documents, such as Ethnographic Overview and Assessments, Traditional Use Studies, Cultural Affiliation Studies, Ethnographic Landscape Studies, Ethnohistories, and REAPs? Are these baseline documents up-to-date? Does the park have special baseline document needs resulting from treaties or legislation, such as access permits or subsistence harvest surveys?**

Mostly. The monument's EOA was updated in 2008. An ethnographic inventory from 1997 is still a useful description of the monument's ethnographic resources. A REAP in 1993 was conducted to inform the development of the first Climbing Management Plan. The monument's staff consults regularly with associated Tribes in order to understand historic and modern usage of ethnographic sites and resources, and to inform management decisions.

The monument is missing a set of Traditional Use Studies and a REAP (see Needs Assessment #2). These studies would further enhance the monument's understanding and management of ethnographic resources.

7. **What other cultural resource studies or publications about people and communities associated with the park have been completed? (List applicable publications that can or do serve as a resource for the park.)**

White 1998, "Naming Bear Lodge: Ethnotoponymy and the Devils Tower National Monument" [traditional knowledge of and naming narratives for Devils Tower]

Unpublished Oral History: the Chief of Interpretation funded a project ca.2013-2014 that recorded oral histories from members of six Tribes. Tribal members described what Bear's Lodge means to them and their people, and their stories are presented in an audio kiosk at the picnic grounds

Inventory

1. **Have appropriate studies and consultations been conducted to sufficiently identify and document resources and uses, TAPs, and other affected groups and cultural associations? Are the inventories up-to-date? Does the park have special inventory needs resulting from treaties or legislation such as access permits or subsistence?**

The monument has conducted most of its needed studies, consults regularly with associated Tribes, and its inventories are current. A REAP is needed to determine if there are non-American Indian TAPs associated with the monument, and what monument resources might be significant to them. No special inventory needs are known at this time.

In 2018 the monument hired a term environmental protection specialist who consulted with associated Tribes regarding usage of ethnobotanical resources, and worked on agreements and other compliance requirements related to the NPS Plant Gathering Regulation.

2. **Has research, beyond baseline documentation, been conducted to identify the park's ethnographic resources (e.g. ethnobotany, ethnobiology) and their significance to the park and associated communities? (List applicable publications / references.)**

    Research related to the significance of the Tower as a sacred site for associated Tribes and as a popular recreational site for climbers was discussed above. Otherwise, no additional research has been conducted.

3. **Has the park conducted studies and consultations to identify and manage potential TCPs and Sacred Sites? How many potential TCPs and Sacred Sites does the park estimate they have, based on studies and consultations?**

    The Tower TCP was identified and described in Hanson and Chirinos (1997). Their report surveyed the entire monument, and along with documenting numerous examples of personal offerings (prayer bundles, etc.) the authors identified two other ethnographic resources that could potentially be TCPs: the Sun Dance ceremonial grounds and the Sun Dance-associated campground. The monument's regular consultations with associated Tribes provides a venue for disclosing other TCPs, should they desire.

Documentation

1. **Have TCPs or historic properties of cultural or religious significance been identified?**

    Yes. Based on Hanson and Chirinos 1997 (field work 1990; original manuscript 1991; submitted to the SHPO in 1992), the SHPO concurred that "Devils Tower and the surrounding traditional use areas (shown on Figure 2 of the report)" were NRHP-eligible under Criterion A, and the Tower itself additionally under Criterion B as a TCP (SHPO letter to Superintendent Debbie Bird, dated 1/12/1993). How far around the Tower is meant by "surrounding" and what exactly is meant by a "use area" is a little ambiguous since Figure 2 of the report labels "ritual use areas" as the Tower, the Sun Dance grounds, the Sun Dance-associated campground, and four personal offering sites (prayer cloths, prayer bundles) scattered around the monument. However, a map included as Attachment 2 to the DOE letter marks the "DOE Area" as that bounded by the Tower Trail. Based on the Hanson and Chirinos report and presumably this SHPO letter, Kathy McKoy also identified the Tower Trail as the TCP boundary in an MPDF, which was approved and signed by the Keeper on July 24, 2000. The Tower TCP does not have a Smithsonian Number. Molyneaux (2000:81) obtained a Smithsonian Number (48CK0106) for the entire monument and recommended it eligible as an "NPS development and as a Traditional Cultural Property" citing recreational and ritual usages, but there does not appear to be documentation on file indicating whether or not the SHPO concurred with this determination.

2. **Have identified TCPs and Sacred Sites been documented to NRHP-level standards?**

    No formal NRHP documentation or nomination has been prepared for the Tower TCP or other potential TCPs on the monument. IMRO cultural anthropologists recommend consulting with the Tribes prior to proceeding with formal NRHP documentation and nomination of the Tower TCP.

3. **Are reports and publications uploaded to IRMA?**

    No. Seven reports should be uploaded to IRMA. See Appendix 3, Bibliography: all entries other than the two Judy Shafer (1996) document sets and the oral histories (unless they are transcribed) should be uploaded.

The two Shafer File volumes are sets of original records relating to development of the first Climbing Management Plan, including tribal consultation records. They were sent to TIC and are now at a federal records center. Digital copies are not available from eTIC, and the records are effectively unavailable to the monument. Because of the contentiousness and ongoing importance of the Climbing Management Plan, and because it involves a TCP, the original records should be recovered from the federal records center and archived at MORU. Digital copies could also be uploaded to eTIC if desired.

4. **Does park GIS incorporate pertinent resource information?**

   The sweat lodge (on the Sun Dance ceremonial grounds) has a GIS polygon. This data is stored as a sensitive cultural resource layer. There is no polygon for the Tower TCP, although it is bound by the Tower Trail which exists in the GIS database as a series of lines in a transportation/trails shape file. Other ethnographic sites (prayer bundles, Sun Dance-associated campground) recorded by Hanson & Chirinos have no GIS data.

5. **Are research results disseminated to park managers, planners, interpreters, and other NPS specialists and incorporated into appropriate park planning documents? How is the information disseminated? What are preferred or suggested methods of receipt of ethnographic studies and reports for internal distribution at the park? How is information shared with associated communities and the public as applicable?**

   Yes: The Tower itself, the resources associated with the Sun Dance grounds, and traditional/spiritual use in general are captured and described as an FRV in the 2014 Foundation Document. Supported by ethnographic research, the monument's staff actively engage with associated Tribes to discuss management of these resources. Information is shared with the public though interpretive signage, which is created in consultation with associated Tribes.

Needs Assessment

1. **Do park planning documents consider and direct the management of ethnographic resources, both tangible and intangible? In addition to the definition of ethnographic resources found in NPS-28, does the park manage other resources as ethnographic resources?**

   Yes, monument staff take ethnographic resources into consideration during project planning and general management decisions. One of the two most important management documents for DETO is their Climbing Management Plan, the focus of which is managing an ethnographic resource (the Tower) in a manner acceptable to associated Tribes to the extent possible given that it is also a popular rock climbing destination.

2. **Has the park assessed the need for completion of baseline Ethnographic documents, such as Ethnographic Overview and Assessments, Traditional Use Studies, Cultural Affiliation Studies, Ethnographic Landscape Studies, Ethnohistories, and REAPs? Do these baseline documents need to be updated?**

   The monument did not identify ethnographic baseline documents as data or planning needs.

   The monument needs Traditional Use Studies to better understand what each of its associated Tribes values on the monument and what their relationship with it has traditionally been. Currently studies only discuss "tribal use" in a general sense. Otherwise, it has no special inventory needs.

A REAP is recommended to explore potential traditional connections between local communities and the monument. This may be as simple as oral histories with descendants of early settlers (especially pre-monument settlers) in the area, followed by a summary report.

The monument should also determine if oral histories of members of six Tribes – recordings funded by the Chief of Interpretation and used in an audio kiosk at the campground – are valuable as ethnographic research, and if so they should be transcribed.

3. **Does the park consult with TAPs during project scoping, while evaluating alternatives, and during project implementation?**

    Yes, for all major projects and to the best of their ability for small projects (see Compliance worksheet). Face-to-face consultations with associated Tribes are held once or twice per year.

4. **Does the park understand the role and function of cultural anthropology and ethnographic resources in terms of addressing park needs, particularly as it pertains to understanding the relationship between any associated communities and the park?**

    Yes. Staff understands that the monument in its entirety is an ethnographic landscape, which has been characterized by prior ethnographic research and must be managed in consultation with tribal partners.

    One of the monument's most important planning and management documents – the Climbing Management Plan – was initially informed by a series of ethnographic studies focused on the conflict between traditional usage of the Tower area by associated Tribes and recreational usage by climbers.

5. **Has the park assessed the relationship between living peoples, communities, families and descendants and their associations and expectations for engagement with the park today?**

    Yes, for associated Tribes. The monument also understands current and historical connections between local communities and the Tower, although the potential for these communities to be TAPs has not been formally studied.

6. **Does the park have a prioritized list of cultural anthropology needs that is complete and current? Is this list kept up-to-date with completed projects, ongoing projects, and planned projects?**

    No.

7. **Are the cultural anthropology needs professionally scoped and entered into PMIS?**

    No.

8. **Does the park have access to a cultural anthropologist who meets professional standards (park or Regional Office staff, or through agreement with another park, agency, or partner)? Is the cultural anthropologist regularly consulted during project scoping and planning? (See NPS-28, Appendix E for standards.)**

    Yes. The monument consults with professional cultural anthropologists at IMRO for technical advice and Section 106 support.

Treatment Strategies

1. **Do planning documents contain information on traditional resource uses by Tribes and other TAPs, the status of ethnographic data, and the basis for use?**

   Project plans take traditional usage into account.

2. **Does the park collaborate with Tribes and other TAPs in the ongoing management of TCPs, Sacred Sites, and ethnographic resources?**

   Yes. The entire monument is an ethnographic landscape, so collaboration with tribal partners is more general and not necessarily focused on individual resources. Face-to-face meetings with Tribes occur once or twice per year. Tribes are involved in Section 106 consultations, and were engaged to consult over new interpretive signage that will be installed around the Tower.

3. **Does the park partner or collaborate with Tribes and other TAPs on mutually beneficial projects such as inventory research, cultural awareness programs, publications, resource needs and expectations, particularly as it relates to community histories, historical preservation, and implications for living communities?**

   Yes, the park collaborates with its associated Tribes.

4. **Are the impacts of NPS and external activities monitored to prevent impairment of ethnographic resources and traditional uses?**

   Yes. The most direct threats to the Tower and environs are heavy usage by visitors and rock climbing, both of which are routinely addressed in monument planning and management documents.

5. **Have cultural affiliations of museum objects been identified? Where NAGPRA applies, has the repatriation processes been implemented?**

   Some museum objects are of unknown cultural affiliation. All NAGPRA inventory items have been repatriated. In the course of this CRSA it was found that there may be several objects of cultural patrimony still in the collection. Staff at WACC and MORU are determining if this is the case.

6. **Have ethnographic resources and their significance to associated Tribes as well as non-tribal associated communities been incorporated into park management and treatment strategies? (E.g. African burial grounds and associated materials of importance to descendants of enslaved Africans.)**

   Yes. One of the most important management documents on the monument is the Climbing Management Plan, which draws heavily on ethnographic data and is targeted at respectfully managing an ethnographic resource (the Tower).

Cultural Landscapes Worksheet

Knowledge

1. **Does the park have an HRS(s)? If so, list the title and date of the study, along with the contexts addressed in the report.**

   No.

2. **List the park's CLRs with a complete Part 1: Site History, Existing Conditions, and Analysis and Evaluation.**

   No CLIs or CLRs have been completed. A CLI of the Tower Trail and Red Beds Trail landscape is funded for 2019.

   a. **Based on the known number of cultural landscapes in the park that are eligible for the NRHP (listed previously in the worksheet for Knowledge), what is the percentage with complete Part 1 CLRs?**

   0%

3. **List the cultural landscapes in the park that are eligible for, or listed in, the NRHP. Indicate whether the cultural landscapes have been determined a fundamental or other important resource by placing an (FRV) or (OIRV) after the name of the landscape.**

   None of the cultural landscapes have a consensus DOE. In the 2014 Foundation Document, under the OIRV "Cultural Resources," the monument is described as a landscape-level cultural resource.

4. **List existing baseline research for the park's cultural landscapes, including CLIs and CLRs.**

   No baseline documentation has been completed. However, the Regional Historical Landscape Architect has identified four potential cultural landscapes. These differ from the four current placeholder records in CLI:

   - Ethnographic landscape (monument-wide)
   - Tower Trail and Red Beds Trail landscape
   - CCC Era landscape
   - Mission 66 Administrative Area and Campground landscape

Inventory

1. **List the certified CLIs completed for the park.**

   None.

   a. **What percentage of the park's cultural landscapes eligible for, or listed in, the NRHP has a certified CLI?**

   N/A

Documentation

1. **List the NRHP documentation that is associated with the park's cultural landscapes.**

   None of the cultural landscapes have NRHP documentation.

a. **Based on the known number of cultural landscapes in the park that are eligible for, or listed in, the NRHP, what is the percentage with adequate documentation?**

    N/A

2. **List the DOE documentation associated with the park's cultural landscapes.**

    None of the cultural landscapes have a consensus DOE.

    a. **Based on the known number of cultural landscapes in the park that are eligible for, or listed in, the NRHP (listed previously in the worksheet for Knowledge measures), what is the percentage with DOE documentation?**

        None of the cultural landscapes have been evaluated for NRHP eligibility.

3. **List the HALS documentation completed for the park's cultural landscapes.**

    No HALS documentation has been completed.

    a. **Based on the known number of cultural landscapes in the park that are eligible for, or listed in, the NRHP (listed previously in the worksheet for Knowledge), determine the percentage of cultural landscapes with adequate HALS documentation.**

        0%

4. **How many CLRs and publications are entered in IRMA? How many reports need to be entered? What is the percentage of existing reports entered into IRMA?**

    The monument has no cultural landscape documents.

5. **Define the current distribution list for park cultural landscape research.**

    When completed, a CLR would be disseminated to all monument employees. Copies should also be provided to IMRO and WASO, and uploaded to IRMA.

Needs Assessment

1. **Identify the park's cultural landscapes advisor.**

    Fielding Link, Regional Historical Landscape Architect, IMRO Historic Preservation Program.

2. **List the key issues and associated planning and data needs for cultural landscapes included in park planning and resource management documents. Are they adequately addressed?**

    "Cultural Landscape Inventory" is stated as a need in the 2014 Foundation Document. The monument actually needs four CLIs (one is funded) and four CLRs. IMRO can provide technical assistance with scoping these projects.

3. **List the project statements in PMIS that address cultural landscape stewardship.**

    There is one project statement: "Complete Cultural Landscape Report and Cultural Landscape Inventory" (PMIS #208113), unfunded and last updated in 2016. This should be broken into two different projects (see below).

    a. **List the cultural landscape PMIS statements that should be added to PMIS.**

    The projects listed below should be phased, with CLIs completed before CLR requests:

- CLI for Mission 66 Administrative Area and Campground landscape
- CLI for the ethnographic landscape (monument-wide)
- CLI for CCC Era landscape
- CLR for Mission 66 Administrative Area and Campground landscape
- CLR for Tower Trail and Red Beds Trail landscape
- CLR for the ethnographic landscape (monument-wide)
- CLR for CCC Era landscape

Treatment Strategies

1. **List the park's CLRs with a complete Part 2: Treatment.**

   No CLRs have been completed.

   a. **Based on the known number of cultural landscapes in the park that are eligible for the NRHP (listed previously in the worksheet for Knowledge), what is the percentage with complete Part 2 CLRs?**

   N/A: none of the cultural landscapes have a consensus DOE.

   b. **Have the treatment guidelines and tasks included in the Part 2 CLRs been incorporated into FMSS Work Orders (Parent and Child as appropriate).**

   No treatment guidelines have been developed.

2. **Indicate if the park has a historical landscape architect on its CRM Adviser team to assist in the review of any actions requiring compliance with Section 106. Identify who is currently serving as the landscape advisor.**

   Fielding Link, Regional Historical Landscape Architect, provides technical assistance.

3. **Define the park's method for recording treatment actions in the cultural landscape.**

   N/A

Maintenance Practices

1. **Based on the known number of cultural landscapes in the park that are eligible for the NRHP (listed previously in the worksheet for Knowledge), are maintained cultural landscape features that need cyclic maintenance adequately represented in FMSS?**

   None of the cultural landscapes have a consensus DOE.

   a. **What is the percentage that is adequately addressed in FMSS?**

   0%

b. **Does the park's FMSS data include adequate work orders to preserve the character of the cultural landscapes by correcting deferred maintenance and carrying out recurring maintenance?**

No cultural landscapes features are represented as such in FMSS. However, potential cultural landscapes features (e.g. Tower Trail) should be treated as eligible until a consensus DOE is made.

2. **List the cultural landscape maintenance training provided to park staff.**

None.

3. **Is all ground disturbances cleared or monitored by an archeologist?**

DETO has access to an archeologist through an interagency agreement with Black Hill National Forest who could assist in clearing and monitoring ground disturbing projects.

Certified Condition

1. **List the certified CLIs in the park and indicate the condition associated with each landscape (good, fair, poor).**

None.

a. **What is the percentage of certified CLIs with landscapes in good condition?**

N/A

2. **List the locations in FMSS associated with the park's cultural landscapes. Include asset types such as maintained landscapes, trails, and roads that contribute to the landscape's historic character. List the FCI assigned to each location.**

No cultural landscapes have been documented, and no locations or assets in FMSS are marked as part of a cultural landscape.

The following table lists facilities that are features of potential landscapes.

Facility #	Identification	Potentially Associated Landscape	FMSS #	FMSS Type	Heritage Asset?	FCI Condition
B01	Old Custodian's Residence	CCC Era landscape	63120	L	Y	.199 / Poor
B03	Visitors Center	CCC Era landscape	63121	L	Y	.182 / Poor
B04	Entrance Station	CCC Era landscape	63044	L	Y	.326 / Poor
B13	Fire Hose House	CCC Era landscape	63122	L	Y	.164 / Poor
R10	Entrance Road	CCC Era landscape	63042	L	Y	.097 / Good
R10A	Entrance Road Culverts Type A	CCC Era landscape	No record	A	Y	
R10B104	Entrance Road Culvert Type B at Mile 1.04	CCC Era landscape	148797	A	Y	

R10B204	Entrance Road Culvert Type B at Mile 2.04	CCC Era landscape	149743	A	Y	
R10C149	Entrance Road Culvert Type C at Mile 1.49	CCC Era landscape	149353	A	Y	
R10C173	Entrance Road Culvert Type C at Mile 1.73	CCC Era landscape	149624	A	Y	
R10C220	Entrance Road Culvert Type C at Mile 2.20	CCC Era landscape	149799	A	Y	
R10E146	Entrance Road Culvert Type E at Mile 1.46	CCC Era landscape	148972	A	Y	
R10K	Entrance Road Culverts Type K (3 total)	CCC Era landscape	148765 148826 149934	A	Y	
TO1	Tower Trail	Tower Trail and Red Beds Trail landscape	63128	L	N	.203 / Poor
TO3	Red Beds Trail	Tower Trail and Red Beds Trail landscape	63129	L	N	.163 / Poor

a. **What is the percentage of locations with an FCI in good condition?**

14% (1/7)

Historic Structures Worksheet

Note: *There are six documented historic structures at DETO, and these are listed under Knowledge question #3(a). However, there are 14 records in LCS because the culverts associated with the Entrance Road are grouped into eight separate LCS records, according to design type (see table under Certified Condition question #1). In FMSS, the Entrance Road is a location and each culvert record is an asset of it. The Tower Ladder has its own LCS record, and in FMSS it is an asset of the Tower Trail. It is recommended that the Tower Ladder be made its own location in FMSS, since both its historical significance and maintenance needs are unrelated to the Tower Trail.*

Knowledge

1. **Does the park have an HRS(s)? If so, list the title and date of the study, along with the contexts addressed in the report.**

   No.

2. **List the park's HSRs with a complete Part 1: Site History, Existing Conditions, and Analysis and Evaluation.**

   Lingo et al 2004. *Historic Structure Report and Historic Assessment, Devils Tower National Monument*. – Old Administrative Building, Custodian's Residence, Fire Hose House, Entrance Station

   a. **Based on the known number of historic structures in the park that are eligible for the NRHP (listed previously in the worksheet for Knowledge), what is the percentage with complete Part 1 HSRs?**

      4/6 (67%). The Entrance Road and culverts lack an HSR part 1, as does the Tower Ladder.

3. **Is the scope of historic structures in the park understood?**

   Yes. Daugherty 1984 and Rogers 2008 provide a relevant, general historic background with which to understand monument resources. McKoy's MPDF (2000) defines historic contexts and property types for use in evaluating structures for NRHP eligibility, but does not include a Mission 66 context. The monument's resources dating to before 1950 are well documented and understood, and staff recognizes the need for a Mission 66 study.

   a. **List the historic structures in the park that are eligible for, or listed in, the NRHP.**

      The following structures are listed in the NRHP. There are currently no structures that are determined eligible but not listed.

      - Custodian's Residence (Old Headquarters Area Historic District)
      - Visitors Center / Old Administration Building (Old Headquarters Area historic District)
      - Fire Hose House (Old Headquarters Area historic District)
      - Entrance Station
      - Tower Ladder
      - Entrance Road (its associated culverts are grouped into eight separate LCS records)

b. **List existing baseline research for the park's historic structures, including resources included in historic structure inventories (i.e., LCS) and HSRs.**

HSR: Lingo et al 2004. *Historic Structure Report and Historic Assessment.* (Old Admin Building, Custodian's Residence, Fire Hose House, Entrance Station)

Section 110 Inventory: Richardson 2008. *Intermountain Region New Deal Resources Research Findings for DETO*.

McKoy's MPDF (2000) provides historic contexts for evaluation of pre-1950 historic structures.

Several administrative histories provide good background information for historic structures: Mattison 1955, Daugherty 1984, Rogers 2008.

c. **Indicate whether the historic structures have been determined a fundamental or other important resource by placing an (FM) or (OIR) after the name of the structure.**

Historic structures are not singled out but "Cultural Resources" in general are determined an OIRV in the 2014 Foundation Document, and CCC Era construction is mentioned in the narrative.

Inventory

1. **List the certified LCS records completed for the park.**

None. All 14 records were certified in 2005, but this is out of tolerance (6 years).

a. **What percentage of the park's historic structures eligible for, or listed in, the NRHP has a certified LCS record?**

0%

Documentation

1. **List the NRHP documentation that is associated with the park's historic structures.**

48CK1499 Old Headquarters Area Historic District (*Visitors Center, Custodian's Residence, Fire Hose House*): NRHP Nomination Form on file, listed in 2000

48CK1642 Entrance Station: NRHP Nomination Form on file, listed in 2000

48CK1641 Tower Ladder: NRHP Nomination Form on file, listed in 2000

48CK1645 Entrance Road and culverts: NRHP Nomination Form on file, listed in 2000

a. **Based on the known number of historic structures in the park that are eligible for, or listed in, the NRHP (listed previously in the worksheet for Knowledge measures), what is the percentage with adequate documentation?**

100% (6/6). All six are listed and have adequate NRHP documentation, although the forms were submitted in 2000 and will be considered outdated by 2020.

2. **List the DOE documentation associated with the park's historic structures.**

There is no DOE documentation: All eligible structures are listed on the NRHP.

a. **Based on the known number of historic structures in the park that are eligible for, or listed in, the NRHP (listed previously in the worksheet for Knowledge measures), what is the percentage with DOE documentation?**

N/A. NRHP-listed structures do not need DOE documentation and are not counted here. There are no other structures known to be eligible for the NRHP. However, there are two historic trails that are unevaluated and require DOE documentation, as well as approximately 18 structures with associated roads and lots (along with potentially contributing signs and infrastructure) from the Mission 66 Era.

3. **List the HABS and HAER documentation completed for the park's historic structures.**

No HABS/HAER documentation has been completed.

a. **Based on the known number of historic structures in the park that are eligible for, or listed in, the NRHP (listed previously in the worksheet for Knowledge), determine the percentage of historic structures with adequate HABS or HAER documentation.**

No HABS/HAER documentation has been completed. At this time no structures have been identified that warrant this level of documentation, but the Tower Ladder should be evaluated for such following its 2018 condition assessment.

4. **How many HSRs and publications are entered in the IRMA database? How many reports need to be entered? What is the percentage of existing reports entered into IRMA?**

0% (0/3) of the baseline documents listed here are in IRMA. All of them are in eTIC including a downloadable pdf:

Wegman-French & Brower 1995 (Historic Resource Survey of CCC Era river management features)

Lingo et al 2004 (HSR for four eligible CCC Era buildings)

Richardson 2008 (Inventory of CCC Era structures)

5. **Define the current distribution list for park historic structure research.**

Results of historic structures studies are distributed to all monument employees. Copies should also be sent to IMRO staff.

Needs Assessment

1. **Who is the park's historic structures advisor for Section 106?**

Elizabeth Pidgeon, Regional Historical Architect, IMRO Historic Preservation Program

2. **List the key issues and associated planning and data needs for historic structures included in park planning and resource management documents. Are the park's needs adequately addressed?**

The monument has a critical need to record and evaluate its Mission 66 structures and obtain concurrence DOEs for the structures individually and as a potential historic district. This need is identified in the 2014 Foundation Document.

3. **List the project statements in PMIS that address historic structure stewardship.**

    PMIS #216184 (Rehabilitate Exterior of Three Historic Structures) will update the HSR for CCC Era structures.

    a. **List the historic structure PMIS statements that should be added to PMIS.**

        Mission 66 structures inventory and DOEs
        Mission 66 structures HSR (parts 1 and 2), including an HPG as an appendix

Treatment Strategies

1. **List the park's HSRs with a complete Part 2: Treatment.**

    67% (4/6).

    a. **Based on the known number of historic structures in the park that are eligible for the NRHP (listed previously in the worksheet for Knowledge), what is the percentage with complete Part 2 HSRs?**

        4/6 (67%). The Entrance Road and culverts lack an HSR part 2, as does the Tower Ladder. Rather than an HSR, treatment recommendations for the Tower Ladder will come from a VT project: a condition assessment was conducted in July 2018, and treatment recommendations will follow.

    b. **Have the treatment guidelines and tasks included in the Part 2 HSRs been incorporated into FMSS Work Orders (Parent and Child as appropriate).**

        There are no current HSRs to drive tasks in FMSS. It appears that at least some of the treatment suggestions in the 2004 HSR were carried out and recorded in the Long Descriptions. HSR recommendations for ongoing, asset-specific treatment is not captured in FMSS, but all work orders for historic structures include these recommendations and the SOI treatment standards.

2. **Does the park have a historical architect in its CRM Adviser team to assist in the review of any actions requiring compliance with Section 106?**

    Elizabeth Pidgeon, Regional Historical Architect

3. **Define the park's method for recording treatment actions in the historic structure.**

    The monument captures treatment actions in the Long Descriptions in FMSS, but not consistently. For example, repainting work by a historic preservation team on the Visitor Center was captured, but the FMSS specialist indicated that whether or not a treatment is captured has historically been hit or miss.

    Treatments can be adequately documented in a variety of ways: completion of a treatment report (HSR part 3, VT report, etc.), PEPC project close-out, and/or FMSS long description.

Maintenance Practices

1. **List the historic structures that have records in FMSS.**

    See the table in Certified Condition #1, below.

a. **Based on the known number of historic structures in the park that are eligible for the NRHP (listed previously in the worksheet for Knowledge), what is the percentage that are adequately addressed in FMSS?**

100% are in FMSS and coded as heritage assets. The long descriptions don't include technical guidance for preservation treatment, but do (in some cases) address past work including by historic preservation specialists (e.g. repainting and recapping log cabin wall exteriors).

b. **Does the park's FMSS data include adequate work orders to preserve the character of the historic structures by correcting deferred maintenance and carrying out recurring maintenance?**

Uncertain, but it seems that it does not.

2. **List the historic structure maintenance training provided to park staff.**

No formal preservation training. Maintenance staff are aware of HSR recommendations and SOI standards, and incorporate these into SOWs for contracts and routine maintenance work, but do not have formal training.

3. **Is all ground disturbance cleared or monitored by an archeologist?**

An interagency agreement with Black Hills National Forest would provide for an archeologist to monitor any such projects should the need arise.

Certified Condition

1. **List the certified LCS records in the park and indicate the condition associated with each structure (good, fair, poor).**

Name/Identification	Facility #	LCS#	FMSS #	FMSS Type	LCS Condition	FCI Condition	LCS certified?
Old Custodian's Residence	B01	10770	63120	L	good	.199/Poor	N
Visitors Center	B03	10771	63121	L	fair	.182/Poor	N
Entrance Station	B04	10776	63044	L	good	.326/Poor	N
Fire Hose House	B13	10772	63122	L	good	.164/Poor	N
Tower Ladder	HS20	10775	1010775	A	poor		N
Entrance Road	R10	51314	63042	L	good	.097/Good	N
Entrance Road Culverts Type A	R10A	224630	No record	A	good		N
Entrance Road Culvert Type B at Mile 1.04	R10B104	101126	148797	A	poor		N
Entrance Road Culvert Type B at Mile 2.04	R10B204	101128	149743	A	fair		N
Entrance Road Culvert Type C at Mile 1.49	R10C149	101129	149353	A	fair		N
Entrance Road Culvert Type C at Mile 1.73	R10C173	101130	149624	A	fair		N

Entrance Road Culvert Type C at Mile 2.20	R10C220	101131	149799	A	good		N
Entrance Road Culvert Type E at Mile 1.46	R10E146	101133	148972	A	good		N
Entrance Road Culverts Type K (3 total)	R10K	101134	148765 148826 149934	A	fair		N

    a. What is the percentage of certified LCS records with structures in good condition?

50%, but all of them were last assessed in 2005 and so the assessment is no longer certified as good reliable information.

2. List the locations in FMSS associated with the park's historic structures and the FCI assigned to each location.

See table, above.

    a. What is the percentage of historic structure locations with an FCI in good condition?

20% (1/5). The rest of the structures are assets, not locations (Entrance Road is parent of all culverts, Tower Trail is parent of Tower Ladder).

History Worksheet

Knowledge

1. **Does the park have HRS(s)?**

   No.

   a. **List all reports and dates completed.**

   No HRS completed. One is funded for 2019.

   b. **Do the contextual studies develop all relevant historic contexts for park resources?**

   An MPDF (McKoy 2000) and the administrative histories listed below develop historic contexts and identify property types.

   c. **Does it provide enough information to identify the park's historic resources and evaluate them for the NRHP?**

   Yes, McKoy 2000 and the administrative histories do, although McKoy does not develop an evaluative context for Mission 66. For Mission 66 Era resources the Administrative Histories provide a good overview in the monument, and this combined with the NPS Servicewide Mission 66 Cover Nomination Form would provide enough information for nomination.

   d. **Is the understanding of park resources within all relevant contexts based on best available sound scholarship?**

   Yes: authors were qualified historians who used adequate primary and secondary sources including oral histories, eyewitness accounts, superintendent monthly reports, etc.

2. **Does the park have an Administrative History?**

   Yes.

   a. **Title/Date**

   Mattison 1955. *Devils Tower National Monument: A History.*
   Daugherty 1984. *Devils Tower National Monument: A History of Developments through 1966.*
   Rogers 2008. *Standing Witness: Devils Tower National Monument, A History.*

   b. **Does the study place the creation and management of the park within their historic contexts?**

   Yes.

   c. **Does the study inform managers about why key decisions were made and what the main park management themes are?**

   Yes, key administrative developments and management themes appear to be covered in detail. These include early attempts to expand the monument to include the Little Missouri Buttes; significant changes in the 1990s including increased rock climbing activity and a more visible presence of American Indian spiritual activities; a serious controversy over a prescribed burn in 1998, and the opening of the Hulett Municipal Airport near the Tower in 2003. The document

goes up to 2006, by which time the current Administrative Officer, who is a valuable source of institutional knowledge, was already working at the monument.

d. **Does the study provide sufficient analysis of key stakeholder interest and community relationships?**

Yes, it appears to do so.

e. **Is the understanding and analysis of park's establishment and NPS management based on best available sound scholarship?**

The studies mentioned above were conducted by professional historians who made appropriate use of primary sources, including the superintendent's monthly report which was submitted in narrative form until the mid-1960s, and first-hand witnesses and informants.

3. **What percentage of history baseline documents are complete? (E.g. NRHP documentation, Administrative History, HRSs).**

70% (7/10).

Lacking or insufficient: An HRS is lacking but funded for 2019. NRHP documentation for the Tower Trail and South Side Trail needs to be updated to include evaluation under Mission 66 historic contexts. NRHP documentation is lacking for approximately 18 structures built during the Mission 66 Era.

Complete but soon to be outdated: Existing NRHP nomination forms for historic structures (four documents) are almost 20 years old and should be updated.

Complete: Administrative History (Rogers 2008); DOE for Devils Tower TCP (eligible); DOE for river control features (all not eligible).

4. **Does the research consider the park as a bounded unit or rather as a resource within the larger natural and cultural contexts?**

The administrative histories and NRHP documents consider regional and national trends, but are overwhelmingly NPS- and park unit-oriented in developing historic narratives and evaluation contexts. However, this may be unavoidable: DETO became a national monument soon after the arrival of Euro-Americans in the area; development within its bounds was largely isolated from state or regional contexts such as homesteading and ranching.

5. **What process does the park used for engaging the best qualified researcher (e.g., RFPs, cooperative agreements)?**

DETO consults IMRO for support in selecting researchers.

6. **Is peer review included in the research scope of work when appropriate?**

There is no formal process in place for determining whether peer review is necessary (per Director's Order #11B). No IMRO guidance exists, but CRAG is currently working the issue. Usage of most historic documents on DETO would be limited to internal use for evaluation or resources and treatment: review by IMRO specialists and acceptance by SHPO may suffice.

Inventory

1. **Does the park sufficiently inventory, evaluate, and nominate historic properties to the NRHP and in compliance with Section 110?**

   One important set of resources (Mission 66 Era) lacks Section 110 inventory, and NRHP documentation is generally lacking. The entire monument was surveyed for archeological resources, but the survey is old (field work was 1997-1998) and only 4/70 archeological sites have consensus DOEs on file. The Tower TCP may need an NRHP Nomination Form, depending on input from the Tribes. Mission 66 resources have not yet been inventoried or evaluated as potential historic structures or as a cultural landscape. Three other potential cultural landscapes also lack inventory and NRHP evaluation.

2. **How many DOEs have been completed when compared to the known number of resources. How many of the DOEs have SHPO concurrence and how many DOEs are less formal (like 'treat as eligible' for a particular project)?**

   Historic Structures: 0/20. Six structures are not counted because they are listed on the NRHP. Approximately 18 structures and their associated roads and other features from the Mission 66 Era have not been inventoried and do not have DOEs. One trail constructed prior to the Mission 66 Era but modified during it (Tower Trail) has not been evaluated under that historic context. A second trail constructed in the 1930s (Red Beds Trail) has not been documented or evaluated.

   Archeology: 4/69 resources have SHPO or NRHP documentation to prove their consensus DOEs (total does not include a collected isolated find). The rest have field recommendations. (Note: 10 sites in ASMIS list an official DOE, but could not locate supporting documentation.)

   Cultural Anthropology: The only known TCP (Devils Tower) is eligible by consensus DOE and may need nomination paperwork depending on input from the Tribes.

   Cultural Landscapes: Four potential cultural landscapes are identified but not documented or evaluated for NRHP eligibility (although one will be documented in 2018-19).

Documentation

1. **How many of the park's historic/cultural resources are listed in the NRHP?**

   Historic Structures: Six listed structures.

   Archeology: No listed resources.

   Cultural Anthropology: No listed TCPs or other sites.

   Cultural Landscapes: No listed cultural landscapes.

2. **How many of the park's historic/cultural resources have been determined eligible through DOEs?**

   Historic Structures: None.

   Archeology: None (ASMIS says 10 sites are eligible, but supporting documentation could not be found).

   Cultural Anthropology: One (Devils Tower TCP per consensus with SHPO).

3. **How many historic/cultural resources still need to be evaluated for, and if eligible, listed in the NRHP?**

   Historic Structures: Approximately 18 Mission 66 Era structures and their associated roads and other features need to be evaluated. One CCC Era trail (Red Beds Trail) has never been evaluated, and another (Tower Trail) needs an updated DOE to take the Mission 66 Era context into account.

   Archeology: 65 sites are technically unevaluated. They have field DOEs but no documentation of consensus DOEs (although ASMIS says ten have official DOEs).

   Cultural Landscapes: Four cultural landscapes need to be evaluated.

4. **What percentage of resources have adequate NRHP or DOE documentation that is up-to-date and includes all relevant national, state, and local contexts?**

   Historic Structures: 23% (6/26), but all will be outdated by 2020.

   Archeology: 6% (4/69). Total count excludes the isolated find.

   Cultural Anthropology: 100%. The consensus DOE for the Tower TCP is adequate unless new consultation with the Tribes determine that NRHP nomination is appropriate.

   Cultural Landscapes: 0%.

5. **Has the documentation been reviewed and/or updated at least once within the past 15-20 years to reflect changes in condition or new research, including additional areas of significance and the development of new historic contexts?**

   Four current NRHP documents (for six structures) were revised and submitted in 2000, and will be outdated by 2020.

   N/A for Archeology and Cultural Anthropology. Per IMRO standards, DOE updates for these resources are not triggered by age, but by necessity on a case-by-case basis (change in integrity, new research or historic context, stakeholder request, etc.).

6. **Does the park have the primary history documents in IRMA?**

   3/3 administrative histories are in IRMA.

   0/8 DOE or NRHP documents are in IRMA (including Wegman-French & Brower 1995 and McKoy's MPDF).

Needs Assessment

1. **Who is the park historian? If there is none, does the park have access to a graduate-trained historian for consultation and resource planning?**

   There is no historian at DETO, and the Regional Historian position at IMRO is vacant. The monument has no access to a professional historian.

2. **Do planning documents address gaps in the history documentation or of related historic resources? List documentation needs.**

   Mostly. The Foundation Document lists as "needs" the Mission 66 evaluations, TCP NRHP nomination, and a CLI (which would include a DOE), but does not address documentation for archeological resources.

3. **How many of the park's needed history-related projects are in PMIS?**

    One: the HRS is in PMIS and is funded.

    a. **What percentage of needed projects is addressed in PMIS?** 9% (1/11)

        DOEs for Mission 66 resources are not captured in PMIS.

        DOEs for 3/4 cultural landscapes are not captured in PMIS.

        DOEs for the Tower Trail and the Red Beds Trail as historic structures (as opposed to a cultural landscape) are not captured in PMIS.

        Other DOE/NRHP document updates should be completed as part of other projects: all archeological sites during the updated monument-wide survey; CCC Era structures via an upcoming HSR update; Tower Ladder via an ongoing VT project; Tower Trail and Red Beds Trail landscape via an upcoming CLI.

Compliance Worksheet

Knowledge

1. **Does the park staff (i.e., Superintendent, Facility Manager/Chief of Maintenance, Park Section 106 Coordinator and CRM Team members) have appropriate training?**

   Yes. The Chief of RM conducts the Section 106 process. She has appropriate training, and the primary staff of the monument is small enough (four current staff, two more slots vacant) and work so closely together that she is aware of all undertakings on the monument. She has no cultural resource staff: her SMEs for Section 106 review are all IMRO staff.

Documentation

1. **Describe the Section 106 compliance process for the park. When does consultation with Tribes or NHOs, SHPO/s, THPO/s, and other consulting parties, when appropriate, occur during this process?**

   The monument has a relatively low project work tempo, maybe one large project per year and 15-20 smaller-scale projects. Generally speaking, DETO's process is as follows: when an undertaking is proposed, regardless of scale, the Chief of RM conducts the background research and analysis for Section 106, consulting previous studies and reports for the various disciplines and conducting her own GIS analysis. Other monument staff have little or no direct role in this analysis other than providing planning details about the undertaking itself. The Chief of RM determines if the project satisfies stipulations under the NPS Nationwide PA, which dictates how and when the SHPO will be engaged. She also prepares documentations for consultation with 26 associated Tribes. All projects are entered into PEPC. She sends her completed Section 106 documents to IMRO program managers and SMEs for review. If a particular project requires technical knowledge of a discipline to understand the nature of potential effects, she requests that the appropriate IMRO SME assist in analysis and writing rather than just review. The final documents are sent out to stakeholders, as early in the planning process as feasible. The SHPO process is the straight-forward letter exchange that leads to a concurrence. For the Tribes, she sends out consultation documentation for the larger projects and follows up with phone calls, and eventually sets up a face-to-face consultation with whomever is interested, once or twice per year and sometimes up to 12 Tribes at once. Smaller projects that are known at the time but for which she did not send out an individual consultation packet will also be discussed. DETO and the Tribes reach concurrence at these meeting, or in the course of follow-up correspondence.

   Major projects and most minor projects go through the process as described above. However, others fall by the wayside without completed aspects of the Section 106 review process, for the following reasons:

   - The Chief of RM has no cultural resource staff and also runs the natural resources program, which has no permanent staff. Time is therefore limited, and so Section 106 becomes a process of risk mitigation. Undertakings that have a low probability of impacting known resources or resources of particular interest to stakeholders may not go all the way through the Section 106 process: most low-risk projects fall under the NPS Nationwide PA anyway, so at least the SHPO is

eventually consulted during the biennial meetings; the Tribes may not be. This is not fully compliant with Section 106. It should be noted however that this problem is not unique to DETO: the inability (or unwillingness) to consult with Tribes on all projects with the potential to cause effect is a widespread issue.

- Some projects pop up suddenly. Funding is scarce, and when money unexpectedly becomes available, as sometimes happens, the monument staff has to act fast to commit the funds, and there may not be time for a complete review. This mostly impacts tribal consultation: the initial consultation letters usually must be followed up with one or more phone calls, and to 26 different Tribes. There is usually not enough time to do this for every project, especially those with a short lead time.

- The Chief of RM relies heavily on IMRO staff to review documents and at times to conduct analysis and assist in writing up the review narrative. IMRO staff assist over 90 parks and cannot always get back to her in enough time to properly complete the Section 106 before project plans are approved and funds committed. In some cases she may not even reach out to IMRO staff if there isn't time.

In summary, the SHPO is consulted (per individual project or through the NPS Nationwide PA) for every undertaking with few exceptions, whereas the Tribes are consulted for most projects, including all projects deemed to be of high risk or particular interest. Larger scale or high visibility projects (e.g. 2018 AIP project) get the direct support of appropriate IMRO staff and SMEs.

Needs Assessment

1. **List the members of the Park CRM Team:**

   Section 106 Coordinator: The Chief of RM conducts Section 106 analysis and generates documents. Amy Pallante (IMRO) is available to provide support.

   Archeologist: None on staff. Jacquelin St. Clair (IMRO) is available to provide support.

   Cultural Anthropologist: None on staff. Kim Greenwood and Rosemary Sucec (IMRO) are available to provide support.

   Curator: Zane Martin at MORU is the monument's curator. Tef Rodeffer (IMRO) is also available to provide support.

   Historian: None on staff. IMRO slot vacant.

   Historical Architect: None on staff. Elizabeth Pidgeon (IMRO) is available to provide support.

   Historical Landscape Architect: None on staff. Fielding Link (IMRO) is available to provide support.

Treatment Strategies

1. **How early in project planning, design and development are the Park Section 106 Coordinator and appropriate CRM Team members involved?**

As early as possible. See narrative under "Documentation" section: The CRM team at the monument is the Chief of RM alone, and she involves IMRO program managers and SMEs for review and sometimes assistance with analysis.

2. **Is the NPS Planning, Environment, and Public Comment (PEPC) database used to track compliance with Section 106 for all projects and for retention of all associated Section 106 documentation?**

Yes, DETO uses PEPC to coordinate with IMRO for technical review of consultation documents.

3. **Describe how you determine which appropriate CRM Team members are needed to review a project. For example, does the archeologist on the CRM Team review all projects involving ground disturbance?**

See narrative under "Documentation" section: The Chief of RM is the only CRM team member at the monument, and she consults SMEs at IMRO as needed for particular projects. In practice, IMRO team members do not always contribute to project review, especially those covered under the NPS Nationwide PA.

Consultation Practices

1. **Does the park attend a biennial meeting with the appropriate SHPOs/THPOs?**

Yes, the Chief of RM meets with the Wyoming SHPO biennially per the NPS Nationwide PA. She consults groups of associated Tribes once or twice per year for, among other things, project consultation.

2. **Does the park transmit a report of all projects using the streamlined review process annually to the appropriate SHPO/s and provide a copy to the appropriate THPOs?**

Yes, the report is provided to the SHPO. Tribes do not get a copy, but they are not signatories to the NPS Nationwide PA. Tribes are consulted on all projects except in the cases outlined above.

Geographic Information Systems Worksheet

Knowledge

1. **Does park GIS include pertinent cultural resource research, inventory, and documentation information?**

   Yes, with some missing data. Cultural resources from existing research are captured as polygons, though not all resources. Geospatial data from recent studies have not been incorporated in regional or enterprise datasets but are maintained at the monument.

2. **Does the park use cultural resource GIS data sets in resource management, planning, stewardship decisions and emergency response?**

   Yes. The Chief of RM is proficient in GIS and by default acts as the DETO GIS specialist.

3. **Where are these data sets stored and maintained? LCS, CLI, NRHP (NHLs):**

   Cultural resource data is stored in the cultural resource enterprise dataset (national) except for archeological data (Servicewide hold); all data including archeological is maintained in the regional dataset; the monument also maintains its own database.

Documentation

1. **What percentage of cultural resource sites, structures/buildings, features, and landscapes have geospatial data that meet cultural resource geospatial data transfer standards?**

Resource Type	Number of Resources with GIS Data	Total Number of Resources
Cultural landscape boundaries	N/A	No inventory
Cultural landscape features	N/A	No inventory
Historic structures	10 polygons	10
Historic buildings	4 polygons	4
Archeological sites	50 polygons	70
Ethnographic resources	0	1[1]
Surveyed areas	0	3[2]
Other	0	0
Total	64	88

[1] Tower TCP
[2] Jones 1995, DeVore 1996, Molyneaux et al 2000

2. **Does the park maintain its own inventory of resources, or does it rely on the relevant national databases to track resources (LCS, CLI, ASMIS, ERI, HABS/HAER/HALS)?**

   Yes: DETO has its own GIS database with archeological sites and buildings, and the regional geospatial datasets and data in Park Atlas are identical to the monument's datasets. In 2015 regional datasets (GIS and Park Atlas) were created based on monument data; since then, new data has been created. Park units are supposed to push updates to the region every year, but DETO hasn't done so since 2015. However, not much has changed: four new archeological sites were recorded, not as part of a survey; Section 106 inspection for the AIP project led to one change, a site boundary enlarged.

3. **Does the park have a Park Atlas application? Is the Park Atlas up to date? Does it accurately show cultural resources?**

   Yes, DETO has a Park Atlas, and its data is the same as the regional dataset current as of 2015. The monument itself has more current data that it uses via ArcMap (not Park Atlas) for compliance and management analysis.

4. **Does the park have a GIS-based cultural resource application that allows park staff or the public to have limited access to cultural resource maps/spatial data if you do not have a Park Atlas?**

   DETO has Park Atlas and its own GIS database that it uses for management and planning.

Needs Assessment

1. **Does the park have access to a GIS specialist with experience with cultural resource data, including sensitive data and laws surrounding it? Is it collateral duty for the resource specialist to perform GIS analysis or maintain your inventory?**

   The Chief of RM is proficient in GIS and uses it for management and planning. This is a collateral duty, and she is not specifically trained in cultural resource management.

2. **Does the park rely on GIS specialists in the Regional or National Office instead of park staff? Is this related to park staff time constraints or knowledge gaps?**

   The monument can and does conduct its own GIS analyses. IMRO support is available if desired.

3. **Does the park collaborate and share data with Regional and National cultural resource GIS specialists?**

   Yes. However, the monument has not yet provided IMRO with 2015 site data.

Maintenance Practices

1. **Is the park able to update and refine the data that is used to catalog and display cultural resource GIS information?**

   No. DETO doesn't have staff/resources to field-verify GIS data or QA/QC its database; IMRO does not have staff/resources to substantially assist.

2. **Does the park have a data management plan or strategy to make sure legacy data is incorporated and new data is generated?**

   Yes, IMRO has set up a shared folder with each park unit ("submit to IMRO") as a mechanism for updating data.

Climate Stressors Worksheet

Knowledge

1. **Does the park have access to the climate change projections that indicate environmental conditions may alter, deteriorate, or remove cultural resources at faster rates or in ways not previously observed?**

   Yes, the monument is currently conducting a Climate Change Scenario Planning project, conducted in conjunction with the RSS, which will develop strategies for dealing with these potential resource-specific impacts. Also, Gonzalez (2013) published a one-page data sheet of past climate trends at DETO (1901-2002) and projections out to 2100. Short studies have also been published targeted at impacts to visitation (Fisichelli & Ziesler 2015) and general exposure to climate change effects (Monahan & Fisichelli 2014) at DETO.

2. **Does the park have an RSS that addresses these changing environmental conditions?**

   An RSS is still underway as of November 2018, and environmental stressors and climate change planning are fully integrated.

3. **Are there other related park or local environmental studies documenting hydrology, geomorphology, and wildland fire studies?**

   Yes, the monument is working with the IMRO Hydrologist to characterize DETO's springs – this plays a big role in climate change planning. There is also a planned geohazards assessment in 2021-2022, which will evaluate rockfall potential on the Tower. The Climate Change Scenario Planning also discusses the potential effects of climate change on wildfire frequency, severity, and impacts to cultural resources.

4. **Does the park have staff with climate change training?**

   No, no formal training.

Documentation

1. **What percentage of cultural resources have an on-site assessment of threats and damages due to climate change?**

   None specific to climate change. All documented cultural resources have general threat and disturbance assessments (entered into ASMIS and LCS), and some of these threats are identified as climate change stressors.

2. **Are potential climate change effects on cultural resources adequately documented?**

   a. **List the cultural resources within areas of concern regarding potential effects from climate change.**

   Lithic scatter sites in high visitor use areas, historic structures, and ethnographic resources.

b. **Describe the character of cultural resources and how and to whom they are significant, and list the threats to the identified resources.**

The prehistoric archeological sites and ethnographic resources are significant to multiple Tribes. Historic structures (especially the CCC Era cabins) are significant to visitors who appreciate 20th century history. These structures are also important to visitors because they affect visitor experience in that the buildings serve as visitor facilities (e.g. the Visitor Center). Climate-related threats to prehistoric archeological sites and ethnographic resources include increased erosion, direct fire impacts, and visitor use impacts. Threats to historic structures include fire, projected increased pest damage, and increased exterior maintenance needs.

c. **What impacts and threats have been identified in cultural resource baseline inventories (i.e., CLI, LCS, ASMIS)? Are these impacts and threats being tracked? What is the percentage of cultural resources with an adequate on-site assessment?**

Erosion and visitor use have been identified (in that order) as the top threats/disturbances to archeological sites, and structural deterioration and weather as the top two for historic structures. Climate change projections for DETO show a "very strong" correlation between temperatures and visitor use, with higher temperatures probably resulting in more visitors. The four most likely climate change scenarios would all potentially cause more erosion. Archeological site condition assessments are being conducted on a rotating schedule by an IMRO archeologist (under a TAR) so that each site is assessed every five years. Threats to CCC Era historic structures will be identified in a 2019 HSR update, but are not regularly tracked under a long-term monitoring plan.

d. **What percentage of park land has not been surveyed for cultural resources (i.e., archeology)?**

100% of the monument has been surveyed for archeological and ethnographic resources.

All historic structures have been inventoried except for Mission 66 facilities.

None of the monument's four cultural landscapes have been documented.

Needs Assessment

1. **Does the park have access to cultural resource professionals with climate change expertise?**

Not specifically, but general climate change experts are available through the NPS Climate Change Response Program in Fort Collins, and IMRO staff in the Climate Change / Landscape Conservation Cooperative office are also available to assist. The monument also has access to IMRO cultural resource staff with varying degrees of climate change expertise.

2. **Assess the parks emergency response plans. Are the plans adequate to address the known potential threats, stressors, and damages due to climate change?**

The monument's emergency response plans do not specifically address climate change.

3. **Has the park identified SMEs to assist in the event of an emergency or climate event?**

The monument has SMEs to assist with climate forecasting, at the National Weather Service office in Rapid City, and requests spot weather forecasts during special events, prescribed fires, etc. In the

event of an emergency, the monument has additional resources that can be called for assistance (law enforcement staff from other parks, local emergency and fire response teams, etc.)*.*

Treatment Strategies

1. **Has the park undertaken Climate Change Scenario Planning? Have at risk cultural resources been prioritized for action (based on significance and vulnerability)?**

   Yes, Climate Change Scenario Planning is under way. At-risk cultural resources are being identified and part of this process, and prioritization for action is part of the concurrent RSS.

2. **Does the park have an adaptation approach for vulnerable resources that considers climate change impacts? Are the adaptation options selected and developed feasible and sustainable?**

   The monument does not have a specific adaptation approach in a written plan, however the 2019 HSR update will incorporate climate change treatment strategies for the CCC Era historic structures.

3. **Does the adaptation approach include monitoring for climate change impacts? Has appropriate compliance been initiated or completed for planned adaptation?**

   No.

4. **Have treatments to address threats introduced by climate change been implemented?**

   No.

5. **Are cultural resources incorporated into strategic planning for sustainable operations (as per the NPS Green Parks Plan)? Have cultural resource staff participated in a Climate Friendly Parks (CFP) workshop?**

   DETO is a CFP, and the Chief of RM participated in the CFP workshop. Cultural resources are incorporated in the Modified Environmental Management System Plan, and energy efficiency in the CCC Era historic structures is being addressed in the 2019 HSR update.

Appendix 3: Baseline Document Analysis and Bibliography

This appendix lists the monument's baseline documents that are current, out of date, partial, or lacking as of August 2018, which is followed by a list of all reports and documentation relevant to cultural resource stewardship and management. Baseline documents are defined by the 2016 IMRO Baseline Document Gap Analysis and the June 2017 CRSA Procedures Guide. "Core documents" are a critical subset of the baseline documents as defined by the Cultural Resources Advisory Group (per CRSA Procedures Guide). This analysis was conducted by searching IRMA, eTIC, other online databases, and the monument's internal archives. The bibliography may not be exhaustive.

Baseline Document Analysis

Discipline	Baseline Document Type	Core doc?	Status	Citation	Notes
Archeology	Archeological Identification and Evaluation Study / Section 110 inventories	Y	relevant	Molyneaux et al 2000. The Archeological Survey and National Register Evaluation of Devils Tower National Monument, Crook County, Wyoming, 1997-1998	100% survey of DETO. However, new survey is needed due to exposure of new sites through erosion.
Archeology	Archeological Management Plan	Y	lacking		
Archeology	Archeological Overview and Assessment	Y	out of date	Truesdale et al 1998. *Systemwide Archeological Inventory Program: Rocky Mountain Cluster Plan.*	Molyneaux et al 2000 may also serve as an O&A, since it provides a comprehensive literature review and recommends further studies.
Archeology	Data Recovery	N	N/A		
Climate Change	Climate Change Scenario Plan	N	in progress		Will be completed 2018-19
Climate Change	Climate Change Vulnerability Assessment	N	in progress		Will be completed 2018-19
Cultural Anthropology	Ethnographic Overview and Assessment	Y	current	Harkin & Chapman 2008. *Update of Ethnographic Overview of Devils Tower National Monument, Phases I and I .*	
Cultural Anthropology	Section 110 inventories	Y	relevant	Hanson & Chirinos 1997. *Ethnographic Overview and Assessment .*	Doubles as a field inventory of DETO. Out of date, but due to current knowledge of ethnographic resources and nature of usage by tribes, Rosemary believes an updated survey would not be useful.
Cultural Anthropology	Cultural Affiliation / Lineal Descendent Studies	N	N/A		Affiliated tribes are known with confidence through other ethnographic research. No other affiliated groups suspected.
Cultural Anthropology	Ethnographic Landscapes Study	N	N/A		Entire monument is already known to be an ethnographic landscape and is managed in consultation with Tribes.
Cultural Anthropology	Oral Histories	N	partial	Members of 6 tribes describe what Bear's Lodge means to them (recorded ~2013-2014)	Conducted for an audio kiosk display, funded by Interpretation. Should be assessed for usefulness as ethnographic research, and transcribed if appropriate.
Cultural Anthropology	Rapid Ethnographic Assessment Project	N	out of date	Hanson & Moore 1993. *Ritual and Recreational Perception and Use at Devils Tower National Monument, Wyoming: An Applied Ethnographic Study.*	Project-driven study to inform the climbing management plan. Update is not needed at this time.

Discipline	Baseline Document Type	Core doc?	Status	Citation	Notes
Cultural Anthropology	Traditional Use Study	N	lacking		Needed for all affiliated tribes.
Cultural Landscapes	Cultural Landscape Reports	Y	lacking		Need one for each CLI
Cultural Landscapes	Section 110 inventories (CLI)	Y	lacking	Devil's Tower Ethnographic Landscape (entire park)	Parent Landscape, although the actual CLI may be difficult to fund
Cultural Landscapes	Section 110 inventories (CLI)	Y	funded	Tower Trail & Red Beds Trail	FY 18 as part of TAIP project
Cultural Landscapes	Section 110 inventories (CLI)	Y	lacking	Entrance Road & Old Headquarters Area	
Cultural Landscapes	Section 110 inventories (CLI)	Y	lacking	Mission 66 Administrative Area & Campground	
Cultural Landscapes	Historic American Landscape Survey	N	N/A		
GIS	Base maps: Park Atlas and/or enterprise dataset	Y	partial		See GIS CRSA tables
Historic Structures	Historic American Building Survey	Y	N/A		
Historic Structures	Historic American Engineering Report	Y	N/A		
Historic Structures	Historic Structures Report: Entrance Road	Y	lacking		
Historic Structures	Historic Structures Report: Mission 66 Era	Y	lacking		
Historic Structures	Historic Structures Report: Tower Ladder	Y	lacking		Could be covered by a Vanishing Treasures treatment plan
Historic Structures	Historic Structures Reports: CCC Era	Y	current	Lingo et al 2004. *Historic Structure Report and Historic Assessment, Devils Tower National Monument* .	3/4 buildings in this report will be updated in 2018.
Historic Structures	Section 110 inventories (LCS)	Y	partial	Richardson 2008. *Intermountain Region New Deal Resources Research Findings for DETO.*	No inventory yet for post-1950 structures
History	Administrative History	Y	current	Rogers 2008. *Standing Witness: Devils Tower National Monument, A History* .	
History	Determinations of Eligibility (Official)	Y	relevant	Wegman-French & Brower 1995. *Historic Resources Surveys: Belle Fourche River Tetrahedrons and Basket Dam Revetments* .	Officially not eligible.
History	Determinations of Eligibility (Official)	Y	relevant	Letter to DETO Superintendent concurring that Devils Tower is eligible as a TCP (1/12/1993)	Update is not needed. Tower is actively managed as a TCP.
History	Determinations of Eligibility (Official)	Y	lacking	Mission 66 structures (see CRSA report Appendix 5)	
History	Historic Resource Study	Y	funded		Funded for FY19

Discipline	Baseline Document Type	Core doc?	Status	Citation	Notes
History	National Register Nomination	Y	insufficient	McKoy 1996. *Tower Trail (48CK1643) and South Side Trail (48CK1644) (3/25/1996).*	Determined not eligible, but did not evaluate trails under Mission 66 Era context in consideration of improvements during that era.
History	National Register Nomination	Y	current	McKoy 2000. *Old Headquarters Area Historic District (48CK1499).*	Will be outdated in 2020
History	National Register Nomination	Y	current	McKoy 2000. *Entrance Station (48CK1642).*	Will be outdated in 2020
History	National Register Nomination	Y	current	McKoy 2000. *Entrance Road (48CK1645).*	Will be outdated in 2020
History	National Register Nomination	Y	current	McKoy 2000. *Tower Ladder (48CK1641).*	Will be outdated in 2020
History	Contemporary Use Study	N	N/A		
History	Historic Furnishings Report	N	N/A		
History	Special Resource Studies	N	N/A		IMR has identified no resources in the region that require this.
Museum Collections	Collections Management Plan	Y	current	Bohnert et al 2015. *Museum Collection Management Plan: Devils Tower National Monument* .	
Museum Collections	Emergency Operations Plan (CRAG: as part of Museum Facility Management Plan)	Y	N/A (see notes)		Archives temporarily at the monument: this will be required if they are not removed to MORU.
Museum Collections	Evacuation Plan (CRAG: as part of Museum Facility Management Plan)	Y	N/A (see notes)		Archives temporarily at the monument: this will be required if they are not removed to MORU.
Museum Collections	Fire Protection Survey (CRAG: as part of Museum Facility Management Plan)	Y	N/A (see notes)		Archives temporarily at the monument: this will be required if they are not removed to MORU.
Museum Collections	Museum objects are inventoried, accessioned, and entered into ICMS	Y	partial	ICMS database	Needs more evaluation
Museum Collections	Security Survey (CRAG: as part of Museum Facility Management Plan)	Y	N/A (see notes)		Archives temporarily at the monument: this will be required if they are not removed to MORU.
Museum Collections	Structural Fire Management Plan (CRAG: as part of Museum Facility Management Plan)	Y	N/A (see notes)		Archives temporarily at the monument: this will be required if they are not removed to MORU.
Museum Collections	Archives Survey	N	partial		Unaccessioned archives in DETO offices

Discipline	Baseline Document Type	Core doc?	Status	Citation	Notes
Museum Collections	Collection Condition Survey	N	not funded		Monument has never had one
Museum Collections	Collection Storage Plan	N	N/A		MORU is designated repository..
Museum Collections	Exhibit Plan and Design	N	N/A		
Museum Collections	Housekeeping Plan	N	N/A (see notes)		Archives temporarily at the monument: this will be required if they are not removed to MORU.
Museum Collections	Integrated Pest Management Plan	N	N/A (see notes)		Archives temporarily at the monument: this will be required if they are not removed to MORU.
Museum Collections	Scope of Collection Statement	N	current	Martin 2015. *Devils Tower National Monument Scope of Collection Statement* .	Update needed.

Baseline documents as listed in CRSA Procedures Guide (June 2017), with a few additional documents identified in the IMR Baseline Document Gap Analysis ("BDGA," June 2016)

Core documents as defined by CRAG and published in CRSA Procedures Guide (June 2017)

Bibliography

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Agard, Carol	1997	Report of Two Monitoring Projects for Devils Tower National Monument	U.S. Forest Service	Archeology	no		no record	no	no record	no	While monitoring sewer line construction, recorded cultural materials from excavation.
Anderson, Adrienne	1973	Trip Report and Archeological Assessments, Badlands National Monument, Mount Rushmore National Memorial, Devils Tower National Monument, Wind Cave National Park, Jewel Cave National Monument, Agate Fossil Beds National Monument, Fort Laramie National Historic Site, Scotts Bluff National Historic Site, and Chimney Rock National Historic Site.	Midwest Archeological Center	Archeology	no		no record	no	no record	no	Reconnaissance survey around monument
DeVore, Steven L.	1996	Archeological Investigations of Sewage Line Project and Assessment of Cultural Resources Inventory	National Park Service	Archeology	Identification & Evaluation Study	relevant	no record	no	209202	yes	Revisited 48CK0084, identified 10 new sites. Section 106 (sewer line).
Frankowski, Lynn	1979	Rocky Mountain Region Inventory of Archeological Sites Program: Devil's Tower National Monument	Midwest Archeological Center	Archeology	Overview and Assessment	out of date	no record	no	209038	yes	General notes on Archeological resource and management needs

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Hartzell, James and John Thorson	1962	The Graham Cabin at Devils Tower: Interim Report of Work Carried Out during 1962	Devils Tower National Monument	Archeology	no		no record	no	no record	no	Excavation report for two log structures built by Charles Graham, and mention of historic graffiti (48CK1773)
Jones, Bruce	1980	Archeological Survey at Devils Tower National Monument, Wyoming: 1979 Investigations	Midwest Archeological Center	Archeology	Identification & Evaluation Study	relevant	no record	no	416676	yes	Week-long survey around monument, fifteen sites described (2 revisits)
Jones, Bruce	1995	1991 Archeological Inventory and Evaluative Testing at Devils Tower National Monument	Midwest Archeological Center	Archeology	Identification & Evaluation Study	relevant	627444	no	174815	yes	Limited evaluative test excavations at 48CK0089, and recorded four new sites
Molyneaux, Brian L.	1997	Archeological Inventory and Evaluation Procedures Manual	Archeology Laboratory, University of South Dakota	Archeology	no		no record	no	416677	yes	
Molyneaux, Brian L.	2002	Exploring the Landscapes of Long-Distance Exchange: Evidence from Obsidian Cliffs and Devils Tower, Wyoming	Archeology Laboratory, University of South Dakota	Archeology	no		no record	no	no record	no	Chapter 7 in: Glasscock, Michael D. (ed.) 2002, *Geochemical Evidence for Long Distance Exchange*, Greenwood Press

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Molyneaux, Brian L.	2007	Devils Tower National Monument Archeological Sites Condition Assessments and Assessment of Natural Resource Program Impacts to Archeological Sites, 2006	Archeology Laboratory, University of South Dakota	Archeology	no		no record	no	no record	no	Evaluated 62 sites, described their conditions and made management recommendations.
Molyneaux, Brian L., Nancy J. Hodgson, Eloise R. Ramirez, Rachel M. Maiwald	1998	Results of the 1997 Archeological Survey and National Register Evaluation of Devils Tower National Monument, Crook County, Wyoming	Archeology Laboratory, University of South Dakota	Archeology	no		no record	no	186113	yes	
Molyneaux, Brian L., Nancy J. Hodgson, Eloise Ramirez	1997	Field summary of a cultural resource inventory at Devils Tower National Monument, Wyoming	Archeology Laboratory, University of South Dakota	Archeology	no		627445	no	184556	yes	IRMA record cites this as "Ramirez E and Others, 1998"
Molyneaux, Brian L., Nancy J. Hodgson, Rachel M. Hinton	2000	The Archeological Survey and National Register Evaluation of Devils Tower National Monument, Crook County, Wyoming, 1997-1998	Archeology Laboratory, University of South Dakota	Archeology	Identification & Evaluation Study	relevant	no record	no	192368	yes	Field survey in 1997-1998 covered 100% of monument. Includes comprehensive literature review, analysis of prior and new finds, and historic contexts.
Rizzi, Jena and Rene Ohms	2015	Archeological Project to Prevent Erosion at Cultural Sites in High Visitor Use Areas at Devils Tower National Monument: Sites 48CK1351, 48CK1712, 48CK1774 and 48CK1786	Devils Tower National Monument	Archeology	no		no record	no	no record	no	

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Stone, Dick	n.d.	Untitled	n/a	Archeology	no		no record	no	no record	no	Unpublished manuscript dates to 1935, on file in DETO archives (#1701). See Molyneaux et al 1997 V1 p11 for details.
Truesdale, James A., Adrienne Anderson, Ann Johnson	1998	Systemwide Archeological Inventory Program: Rocky Mountain Cluster Plan	Department of Anthropology, University of Wyoming	Archeology	Overview and Assessment	out of date	123938	yes	no record	no	Inadequate: does not focus on DETO. Includes summaries and recommendations for DETO Archeological program.
Fisichelli, Nicholas A. and Pamela S. Ziesler	2015	Devils Tower National Monument: How might future warming alter visitation?	National Park Service	Climate Stressors	no		2222823	yes	no record	no	Resource brief
Gonzalez, Patrick	2013	Climate Trends: Devils Tower National Monument	National Park Service	Climate Stressors	no		2217676	yes	no record	no	Single page of data, single page of references
Monahan, Bill and Nicholas Fisichelli	2014	Resource Brief: Recent Climate Change Exposure of DETO	National Park Service	Climate Stressors	no		2213706	yes	no record	no	
Cross, Raymond and Elizabeth Brenneman	1997	Devils Tower at the Crossroads: The National Park Service and the Preservation of Native American Cultural Resources in the 21st Century	University of Montana School of Law	Cultural Anthropology	no		no record	no	no record	no	
Hanson, Jeffery R. and David Moore	1993	Ritual and Recreational Perception and Use at Devils Tower National Monument, Wyoming: An Applied Ethnographic Study	University of Texas at Arlington	Cultural Anthropology	Rapid Ethnogr. Assessment Project		no record	no	no record	no	Project-driven study to inform the climbing management plan.

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Hanson, Jeffery R. and David Moore	1999	Applied Anthropology at Devils Tower National Monument	University of Texas at Arlington	Cultural Anthropology	no		no record	no	no record	no	Article published in "Plains Anthropologist," V.44 No.170, Memoir 31, pp.53-60
Hanson, Jeffery R. and Sally Chirinos	1991	Ethnographic Overview and Assessment	University of Texas at Arlington	Cultural Anthropology	Overview and Assessment	out of date	no record	no	no record	no	
Hanson, Jeffery R. and Sally Chirinos	1997	Ethnographic Overview and Assessment	University of Texas at Arlington	Cultural Anthropology	Overview and Assessment	relevant	no record	no	209192	yes	Outdated with respect to traditional uses at monument (more visible presence of tribal spiritual activities now), but still a useful baseline report
Harkin, Michael E. and Fred Chapman	2008	Update of Ethnographic Overview of Devils Tower National Monument, Phases I and II	University of Wyoming	Cultural Anthropology	Overview and Assessment	current	no record	no	no record	no	
Shafer, Judy	1996	Volume: 002, Draft Climbing Management Plan and Environmental Assessment for Devils Tower - Judy Shafer Project File	Denver Service Center, National Park Service	Cultural Anthropology	no		no record	no	1212462	no	Important archival records, but originals are at a federal records center (accession 079-14-0042/box 20). Contains project correspondence, visitor statistics, opposition statements, etc.

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Shafer, Judy	1996	Volume: 003, Tribal Consultations - Judy Shafer Project File	Denver Service Center, National Park Service	Cultural Anthropology	no		no record	no	1212463	no	Important archival records, but originals are at a federal records center (accession 079-14-0042/box 20). Contains memoranda, meeting agendas, visitor study, briefing notes, project correspondence.
Unknown	2013-2014	N/A. Recordings of members of 6 tribes describing what Bear's Lodge means to them, for an audio kiosk display (funded by Interp).	Unknown contractor	Cultural Anthropology	Oral Histories		no record	no	no record	no	Should be assessed for usefulness as ethnographic research, and transcribed if appropriate.
White, David R. M.	1998	Naming Bear Lodge: Ethnotoponymy and the Devils Tower National Monument	Applied Cultural Dynamics	Cultural Anthropology	no		no record	no	419175	yes	
Unspecified	1963	Master Plan Development Outline (Including Mission 66 Edition of V.1, Ch.1)	Devils Tower National Monument	General Management	no		no record	no	209252	yes	Could be a useful resource for upcoming M66 inventory and evaluation.
Unspecified	1995	Climbing Management Plan and Finding of No Significant Impact	Devils Tower National Monument	General Management	no		24536	no	209083	yes	
Unspecified	2002	General Management Plan	Devils Tower National Monument	General Management	no		no record	no	199942	yes	Latest copy in IRMA/eTIC
Unspecified	2014	Foundation Document	Devils Tower National Monument	General Management	no		no record	no	1195255	yes	

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Lingo, Kathy, Ken Lingo, Anthony Crosby, Jim Thompson, Dan Kocisek	2004	Historic Structure Report and Historic Assessment, Devils Tower National Monument	Architecture 2000, P.C., for NPS Intermountain Support Office	Historic Structures	Historic Structures Report	current	no record	no	391788	yes	4 buildings: Old Admin Building, Custodian's Residence, Fire Hose House, Entrance Station. 3 eTIC entries (accession/box 079-10-0142/2 (drawings?); TIC IDs 402138 and 391788).
Richardson, David J.	2008	Intermountain Region New Deal Resources Research Findings for DETO	RMC Consultants, Inc.	Historic Structures	Section 110 Inventory	current	no record	no	418586	yes	Includes information on demolished structures
Unspecified	1999	Entry House Rehabilitation	National Park Service	Historic Structures	no		no record	no	(see notes)	yes	Federal Records Center, accession 079-14-0042 / box 38. Contains file 5 of 5; drawings (final in TIC 109/80042), project manual (draft), visitor study (final in TIC 109/D34)
Unspecified	2003	Project Specifications: Visitor Center Rehabilitation	National Park Service	Historic Structures	no		no record	no	202638	yes	
Unspecified	2006	Project Specifications: Rehabilitate Log Structures, Devils Tower National Monument	National Park Service	Historic Structures	no		no record	no	211338	yes	Looks like the treatment resulting from the Lingo et al 2004 HSR.
Unspecified	2013	Project Specifications: Reroof Building B21 and B24 (PMIS No. 185306)	National Park Service	Historic Structures	no		no record	no	1324406	yes	Mission 66 buildings

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Unspecified	1956 (est)	Mission 66 for Devils Tower National Monument	National Park Service	Historic Structures	no		no record	no	246637	yes	Could be a useful resource for upcoming M66 inventory and evaluation. Short summary of M66, proposed construction at DETO, and estimated costs.
Daugherty, D. John	1984	Devils Tower National Monument: A History of National Park Service Developments through 1966	National Park Service	History	Admin History	out of date	2193591	yes	127751	yes	Administrative history of monument as well as a Historic Structures Inventory. Focus on CCC-era but with good context for pre-1930s resources (Graham's Cabin, stake ladder, original entrance road).
Mattison, Ray H.	1955	Devils Tower National Monument: A History	National Park Service	History	Admin History	out of date	2193589	yes	39058	yes	
McKoy, Kathy	1996	NRHP Registration Form: Tower Trail (48CK1643) and South Side Trail (48CK1644) (3/25/1996)	National Park Service	History	NRHP Nomination	out of date	no record	no	418772	yes	

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
McKoy, Kathy	2000	NRHP Multiple Property Documentation Form	National Park Service	History	no		no record	no	418769	yes	8 sites visited in 1995, form revised/submitted in 2000. Primarily an archival study to establish DETO evaluative contexts and resource types.
McKoy, Kathy	2000	NRHP Registration Form: Old Headquarters Area Historic District (48CK1499)	National Park Service	History	NRHP Nomination	current	no record	no	418766	yes	Form generated in 1996, revised/submitted in 2000.
McKoy, Kathy	2000	NRHP Registration Form: Entrance Station (48CK1642)	National Park Service	History	NRHP Nomination	current	no record	no	418767	yes	Form generated in 1996, revised/submitted in 2000.
McKoy, Kathy	2000	NRHP Registration Form: Entrance Road (48CK1645)	National Park Service	History	NRHP Nomination	current	no record	no	418768	yes	Form generated in 1996, revised/submitted in 2000.
McKoy, Kathy	2000	NRHP Registration Form: Tower Ladder (48CK1641)	National Park Service	History	NRHP Nomination	current	no record	no	418770	yes	Form generated in 1996, revised/submitted in 2000.
Rogers, Jeanne	2008	Standing Witness: Devils Tower National Monument, A History	National Park Service	History	Admin History	current	2193648	yes	no record	no	
Wegman-French, Lysa and Ben Brower	1995	Historic Resources Surveys: Belle Fourche River Tetrahedrons and Basket Dam Revetments	National Park Service	History	Determination of Eligibility	out of date	no record	no	418771	yes	2 reports and 1 SHPO response letter (filed as 1 pdf); 48CK1638 and 48CK1639
WY SHPO	1993	Letter to DETO Superintendent concurring that Devils Tower is eligible as a TCP (1/12/1993)	n/a	History	Determination of Eligibility	out of date	no record	no	no record	no	

Author	Year	Title	Agency / Contractor	Discipline	Baseline Doc?	Status	IRMA code	IRMA efile?	eTIC item ID	eTIC efile?	Notes
Bohnert, Allen, and Wilson	2015	Museum Collection Management Plan: Devils Tower National Monument	National Park Service	Museum Collections	Collection Management Plan	current	no record	no	no record	no	
Caton, Riley and Karen Caton	????	Devils Tower National Monument Structural Fire Management Plan		Museum Collections	Structural Fire Management Plan	out of date	no record	no	no record	no	
Cox, Gregory R.	2001	Scope of Collection Statement	National Park Service	Museum Collections	Scope of Collection	out of date	no record	no	196429	yes	
Layne, Stevan P.	1992	Museum Security Survey: Devils Tower National Monument.		Museum Collections	Security Survey	out of date	no record	no	no record	no	
Martin, Zane	2015	Department of the Interior National Park Service Devils Tower National Monument Scope of Collection Statement	National Park Service	Museum Collections	Scope of Collection	current	no record	no	no record	no	
Pelier, Bill	1988	Emergency Operations Plan Devils Tower National Monument		Museum Collections	Emergency Operations Plan	out of date	no record	no	no record	no	
Spitznas, Roger L. and Edwin C. Alberts	1958	Museum Prospectus for Devils Tower National Monument	National Park Service	Museum Collections	Exhibit Plan and Design	out of date	no record	no	208934	yes	Plan for displays in Visitors Center
Unspecified	1959	Exhibit Plan for Visitor Center	Devils Tower National Monument	Museum Collections	Exhibit Plan and Design	out of date	no record	no	208939	no	
Tubbs, W. A.	1965	Appraisal of the Thurman Café and Hotel	W. A. Tubbs Real Estate Appraisals	Special Study	no		no record	no	66851	yes	

Note: Identification of a type of document as "baseline" is based on guidance in the CRSA Procedures Guide (June 2017).
BDGA = IMR 2016 Baseline Document Gap Analysis

Appendix 4: Consolidated List of Recommended Projects

The following is a consolidated list of the TARs and PMIS projects recommended in this CRSA. Refer to the "List of Preliminary Actions" section and Appendix 1 for more details about each project:

Archeology:

- ASMIS records review and validation/update (discuss with IMRO TAR vs PMIS)
- Document deteriorating pictograph sites for data recovery (PMIS)

Cultural Anthropology:

- REAP to evaluate potential non-tribal TAPs (PMIS)
- Traditional Use Studies for associated Tribes (PMIS)

Cultural Landscapes:

- Mission 66 Administrative Area and Campground landscape CLI (PMIS)
- Mission 66 Administrative Area and Campground landscape CLR (PMIS)
- Tower Trail and Red Beds Trail landscape CLR (PMIS)
- Monument-wide ethnographic landscape CLI (PMIS)
- Monument-wide ethnographic landscape CLR (PMIS)
- CCC Era landscape CLI (PMIS)
- CCC Era landscape CLR (PMIS)
- Update records in CLI database to align with identified cultural landscapes (TAR)
- Interim treatment guidance for cultural landscape features, pending completed CLRs (TAR)

Historic Structures:

- Mission 66 resources architectural inventory and evaluation (PMIS)
- Mission 66 resources HSR and HPG (PMIS)
- CCC Era structures HPG (IMRO can recommend TAR vs PMIS)
- Update LCS to add currently undocumented CCC Era features after CCC Era CLR (TAR)

History:

- Oral history of Sue Skrove (IMRO can recommend TAR vs PMIS)
- NRHP documentation for cultural landscapes after CLI (IMRO can recommend TAR vs PMIS)

Museum Collections:

- SOCS update (PMIS)
- CCS (discuss with IMRO TAR vs PMIS)

GIS:

- Locate or reconstitute geospatial data for survey coverage polygons from prior archeological projects and upload data to regional geospatial dataset (PMIS)
- Create geospatial data for Tower TCP boundary; migrate all archeological data to geospatial data transfer standards (TAR)

Appendix 5: List of Structures Built During the Mission 66 Era

The following list of structures and construction dates was drawn from FMSS, and may require independent research to verify. None of these structures are in LCS.

Note that these are the structures that were *built* during the Mission 66 Era: There are earlier structures that were renovated or otherwise altered (i.e. Tower Trail, Entrance Road) during this time and that therefore must be reevaluated under this historic context.

Some of these facilities may not need to be included in an inventory (i.e. interpretive waysides and infrastructure elements), and others may be grouped and recorded as a single structure (i.e. 13 facilities potentially grouped into "roads and parking lots"). When these potential exclusions and groupings are taken into account, there are roughly 18 structures built during this period. Previously-built structures that were renovated or altered during the Mission 66 Era are not included in the table.

The Regional Historical Landscape Architect and Regional Historical Architect can provide assistance in scoping the inventory and evaluation project.

Structure #	Site Name / Description	Smith ID#	Type	Built	NRHP status	GIS	FMSS FCI*	FMSS Type	FMSS #	General notes
B05	House / Permanent Quarters	not recorded	building	1957	Uneval	polygon	0.641	L	63104	
B06	House / Permanent Quarters	not recorded	building	1957	Uneval	polygon	0.69	L	63105	
B18	Loop A Comfort Station	not recorded	structure	1960	Uneval	polygon	0.314	L	63071	
B19	Loop B Comfort Station	not recorded	structure	1960	Uneval	polygon	0.315	L	63077	
B21	Seasonal Quarters (6-plex)	not recorded	building	1961	Uneval	polygon	0.492	L	63107	
B22	Maintenance / Shop Building	not recorded	building	1961	Uneval	polygon	0.095	L	63097	
B23	Administration Building	not recorded	building	1958	Uneval	polygon	0.093	L	63096	
B24	Offices	not recorded	building	1956	Uneval	polygon	0.121	L	63106	
B26	Picnic Grounds Comfort Station	not recorded	structure	1960	Uneval	polygon	0.104	L	63090	
B49	Flammable Storage	not recorded	structure	1961	Uneval	unknown	0	L	226138	FMSS says salvaged/removed apparently in 1980, but FCI condition is "good."
B50	Pump House Maintenance Shop	not recorded	structure	1961	Uneval	none	0.014	L	226230	
B51	Pump House Main Reservoir	not recorded	grounds	1961	Uneval	none	0.02	L	226231	
G43	Administration Maintenance and Housing Grounds	not recorded	grounds	1962	Uneval	unknown	0.162	L	63100	
G45	Campground Loop A/B Sites and Grounds	not recorded	Grounds	1960	Uneval	unknown	0.076	L	63040	
G46	Picnic Grounds	not recorded	grounds	1960	Uneval	unknown	0.36	L	63089	
IWRT908C	Interpretive Waysides RT	not recorded	object	1965	Uneval	unknown	0.949	L	229733	

Structure #	Site Name / Description	Smith ID#	Type	Built	NRHP status	GIS	FMSS FCI*	FMSS Type	FMSS #	General notes
	908C Prairie Dog Pull-out									
IWRT908A	Interpretive Waysides RT 908A Prairie Dog Pull-out	not recorded	object	1965	Uneval	unknown	0.587	L	229724	
IWRT908B	Interpretive Waysides RT908B Prairie Dog Pull-out	not recorded	object	1965	Uneval	unknown	0.949	L	229732	
IWT01	Interpretative Waysides T01 Tower Trail (paved)	not recorded	object	1965	Uneval	unknown	0.275	L	109902	
IWT02	Interpretive Waysides T02 Joyner Trail	not recorded	object	1965	Uneval	unknown	0.478	L	228290	
IWT03	Interpretive Waysides T03 Red Beds Trail	not recorded	object	1965	Uneval	unknown	0.582	L	228284	
IWT05	Interpretive Waysides T05 Southside Trail	not recorded	object	1965	Uneval	unknown	0.693	L	228288	
RT200	Campground Road	not recorded	road	1956	Uneval	unknown	0.09	L	63066	
RT200A	Campground A Loop Road	not recorded	road	1960	Uneval	unknown	0.06	L	89774	
RT200B	Campground B Loop Road	not recorded	road	1960	Uneval	unknown	0.057	L	89775	
RT400	Administration / Housing Road	not recorded	road	1957	Uneval	unknown	0.081	L	63094	
RT401	South Road (unpaved)	not recorded	road	1960	Uneval	unknown	0	L	63095	
RT402	Offices (B24) Driveway Loop	not recorded	road	1957	Uneval	unknown	0.067	L	89747	
RT900	Ranger Office Employee Parking Lot	not recorded	paved lot	1960	Uneval	unknown	0.031	L	89749	
RT901	Administrative Office Parking Lot	not recorded	paved lot	1959	Uneval	unknown	0.126	L	89751	
RT902	Visitor Center Area Parking Lot (paved)	not recorded	paved lot	1965	Uneval	unknown	0.125	L	63125	
RT905	Maintenance Shop Parking Lot	not recorded	paved lot	1961	Uneval	unknown	0.195	L	89769	

Appendix 5: Structures Built During the Mission 66 Era page 2 of 3

Structure #	Site Name / Description	Smith ID#	Type	Built	NRHP status	GIS	FMSS FCI*	FMSS Type	FMSS #	General notes
RT906	Seasonal Residence Parking Lot	not recorded	paved lot	1962	Uneval	unknown	0.154	L	89770	
RT907A	Picnic Grounds Parking Lot A	not recorded	paved lot	1960	Uneval	unknown	0.24	L	89772	
RT907B	Picnic Grounds Parking Lot B	not recorded	paved lot	1960	Uneval	unknown	0.078	L	89773	
T02	Joyner Trail	not recorded	trail	1955	Uneval	unknown	0.114	L	63132	
T04	Valley Trail	not recorded	trail	1961	Uneval	unknown	0.039	L	63130	
T05	Southside Trail	48CK1644	trail	1960	Uneval	unknown	0.328	L	63131	Needs new DOE: officially not eligible 3/25/96 (NRHP form), but evaluation did not include Mission 66 context.
WS	DETO Distribution System	not recorded	infra-structure	1959	Uneval	unknown	0.032	L	63117	
WWS	Loop A Comfort Station Collection System	not recorded	infra-structure	1960	Uneval	unknown	0	L	63072	
WWS	Loop B Comfort Station Collection System	not recorded	infra-structure	1960	Uneval	unknown	0	L	63088	
WWS	Picnic Grounds Comfort Station Collection System	not recorded	infra-structure	1960	Uneval	unknown	0	L	63091	

*FCI Codes:
0.00 - 0.10 = Good
0.11 - 0.14 = Fair
0.15 - 0.49 = Poor
0.50 - 1.00 = Serious