



Foundation for Planning and Management

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The *Foundation for Planning and Management* document provides the base upon which all future planning efforts are built. The foundation document identifies what is most important to the national historic site through an examination of the establishing legislation, development of purpose and significance statements and primary interpretive themes, and identification of the special mandates that affect national historic site management. The foundation document also identifies fundamental resources and values that are critical to maintaining the national historic site's purpose and significance and analyzes current and future trends that could affect those resources and values. Although not a decision document, the foundation document sets the parameters for future planning and allows National Park Service (NPS) managers to make informed decisions about factors that are critical to the national historic site's operations, management, and future.

The foundation, as identified in *NPS Park Planning Program Standards*, has the following elements:

- Part One — Legal Requirements, which consist of
 - *Park Purpose* — the specific reason for establishing a particular park
 - *Park Significance* — why a park's resources and values are important enough to warrant a National Park Service designation
 - *Primary Interpretive Themes* — what needs to be interpreted to provide people with opportunities to understand and appreciate park purpose and significance
 - *Special Mandates* — any special legislative or judicial requirements or administrative commitments
- Part Two — Analysis of Resources and Values, which includes
 - *Analysis of Fundamental Resources and Values*
 - Analysis of Other Important Resources and Values

National Historic Site History

Hubbell Trading Post National Historic Site (HUTR) is in northeastern Arizona within Apache County. Located just off of Arizona State Highway 264, the national historic site (NHS) is approximately 1 mile west of Ganado and 55 miles northwest of Gallup, New Mexico, and is encompassed by the Navajo Nation. The national historic site consists primarily of a historic vernacular landscape from the period that the trading post was actively run by the Hubbell family — 1878 to 1967.

The boundary for HUTR NHS is marked (generally) to the east by State Highway 264 and the historic irrigation ditch that parallels an irrigation reservoir on the southeast. The northern and western boundaries are marked (generally) by the Pueblo Colorado Wash. The southern boundary is marked by the fence line of the national historic site's southernmost farm field.

The national historic site lies on the Colorado Plateau, an intensely dissected rocky region of various elevations, ranging from 3,500 feet to more than 10,000 feet above sea level. The climate consists of high summer temperatures and subzero winter temperatures, high winds, frequent sandstorms, and high evaporation rates. Periodic droughts are common in the area. All of these conditions make the practice of agriculture not only a challenge but also entirely dependent on the availability of irrigation water.

The natural vegetation in this area consists of Colorado Plateau desert scrub and is characterized by piñon pine in the higher moist areas, with lower elevations supporting piñon/juniper mix. At the lowest elevations, sagebrush is often the only vegetation found.

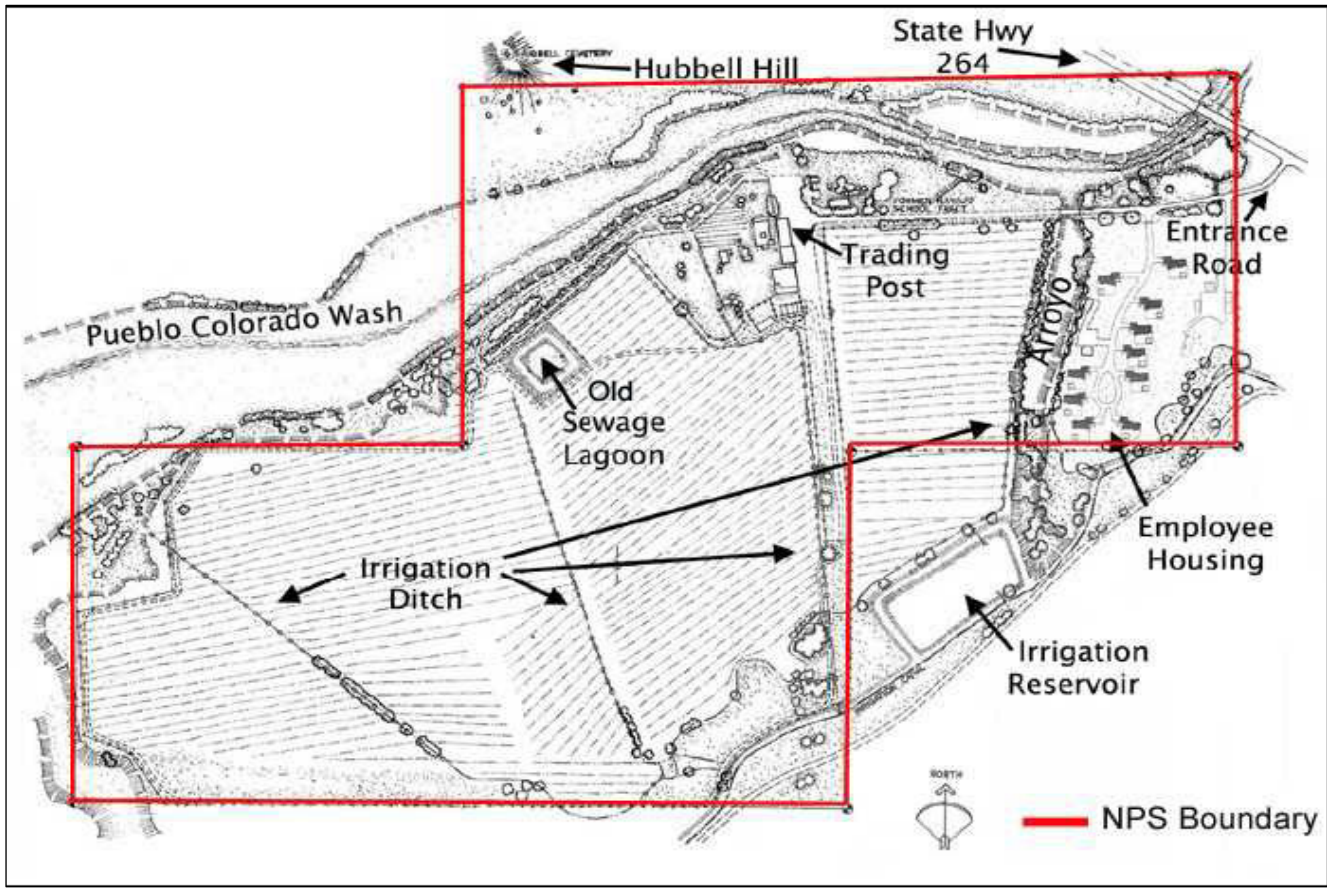
The Pueblo Colorado Wash now cuts through the northernmost part of the national historic site and provides an environment for various native and introduced riparian species of flora and fauna. The remainder of the national

historic site consists of leveled terraces, rising from north to south, from which native vegetation was removed for farming and livestock raising. Some sagebrush and other desert scrub vegetation have recolonized these fields since the cultivation of crops was halted in the mid-1900s.

For many generations, the lands that now make up the national historic site were used by indigenous people, including the Navajo, who currently reside in the area. In 1863, the Navajo people and other tribes were driven from their land by Kit Carson and his troops and were imprisoned by the U.S. Army at Fort Sumner. In 1868, the United States and Navajo tribal representatives signed the first of a number of treaties that established the boundaries of the Navajo Nation. The Navajo were then released from Fort Sumner and allowed to return to their traditional lands.

In approximately 1874, an Anglo European trader named William Leonard established a trading post in the Ganado valley. In 1878, under a "squatter's right," Juan Lorenzo Hubbell purchased the Leonard post, the current location of the Hubbell Trading Post, and later filed a homestead claim for the property. In 1880 the nearby Navajo Nation lands were expanded, engulfing the Hubbell establishment. After many years of efforts to secure the rights to the land, Hubbell finally received a patent for the land in 1917. Consequently, this land became one of the few privately owned parcels of land (private inholding) within the boundaries of the Navajo Nation.

During the first half of the 20th century, Juan Lorenzo Hubbell built an economic empire consisting of more than 20 trading posts with a freighting operation. Through creative marketing of native crafts (mainly rugs and silver) on the east and west coasts, Hubbell was able to greatly influence the production and



development of traditional designs that remain in use today.

Hubbell also was involved in local politics and was an active member of Ganado and other Navajo communities. Avid collectors, the Hubbell family as a whole amassed an extensive and unparalleled personal collection of fine art, literature, furnishings, and Native American and prehistoric artifacts. Owing to the lack of places to stay and the open hospitality provided by Don Lorenzo Hubbell, the Hubbell family home and trading post became an important stop for persons traveling through the Navajo and Hopi lands. Many important people of the day, including presidents, writers, photographers, artists, and archeologists, stayed at the Hubbell home during their explorations of northern Arizona, with some guests returning repeatedly for extended stays. This tradition of hospitality continued under the tenure of Hubbell's son, Ramon, and Dorothy Hubbell (Ramon's wife).

During the mid-20th century, the Hubbell trading empire was reduced primarily to the operations at Ganado. During the 1960s, Dorothy Hubbell struggled to keep the trading post going and to continue to serve her clientele. Through the help of friends at the University of Arizona, the Arizona congressional delegation, and the Museum of Northern Arizona, Dorothy Hubbell was able to arrange the sale of the trading post to the National Park Service. In 1965 the national historic site was authorized by an act of Congress, and the National Park Service began administering the site in 1967, with the intent to keep it an active, traditional trading post. Today, the site is the oldest and longest continuously operated trading post in the American Southwest, and it is listed as a national historic landmark.¹

¹ Excerpts from *Hubbell Trading Post Cultural Landscape Report*, Landum 2002

Part One — Legal Requirements

A park unit's legislative history, purpose, significance, primary interpretive themes, and special mandates set the parameters for planning and operations for each unit of the National Park Service.

Legislative History

Public Law 89-148 established Hubbell Trading Post National Historic Site as a unit of the National Park Service on August 28, 1965 (appendix A). The enabling legislation, which consists of three paragraphs, identifies the parcel of land, trading post structures, and the general nature of the buildings' contents and authorizes the secretary of the interior to purchase the post. It also provides some funding for the national historic site's purchase and operation. Finally, it provides directions on disposal of any excess lands. The act does not specify what the unit's mission should be, other than to preserve and protect the trading post and its contents.

Guidance on the national historic site's purpose is found in the act's legislative history and in the site's administrative history. The Senate Congressional Record states on August 16, 1965, that arrangements should be made to, "have it [Hubbell Trading Post] operate along the lines close to that which were in effect when it was an active post" (Congressional Record — Senate, page 20502). The park's administrative history thoroughly documents the passage of the House and Senate bills leading to the act and discussions on preserving it as a "living trading post." This concept was strongly supported by then NPS Director George Hartzog. The strong tradition of Hubbell Trading Post National Historic Site operating as a living trading post led to a park mission statement articulated in the unit's 2002–2005 *Strategic Plan*:

The mission of Hubbell Trading Post National Historic Site is to preserve, protect, and interpret an original Indian trading post operation and its environs for

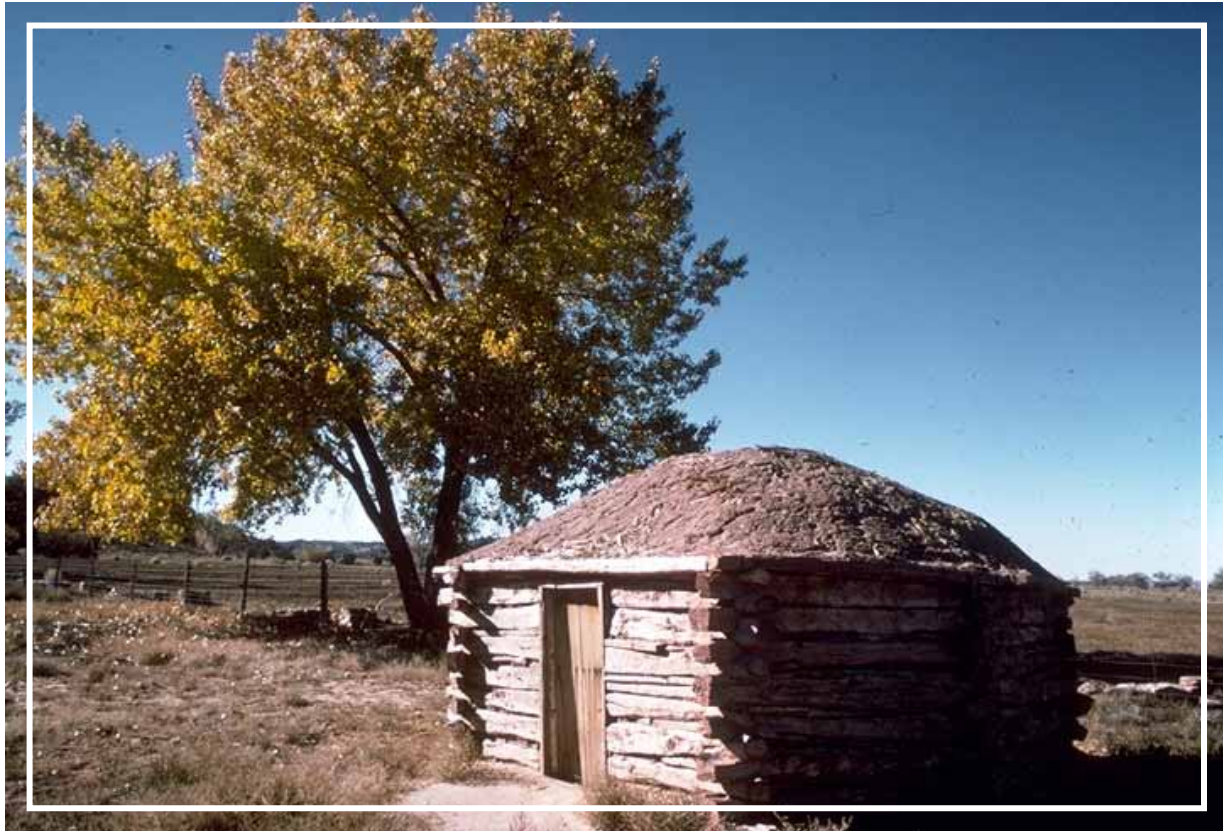
the benefit and enjoyment of the public. The trading post is to be conserved as a functional, viable establishment, reflecting ongoing, traditional trading relationships.

Purpose and Significance Statements

Hubbell Trading Post NHS was specifically set aside to preserve and protect the continuum of trading post operations and its ties to local communities and artisans. Statements of the unit's purpose are grounded in a thorough analysis of the national historic site's legislation and legislative history (appendix B). These documents help articulate Congress's rationale and intent for creating the national historic site. With input from NPS staff and key stakeholders, the following statements were developed:

The purpose of Hubbell Trading Post National Historic Site is to

- Preserve and protect the historic and cultural contents, structures, functional arrangement, and natural and cultural landscapes of Hubbell Trading Post, including the trading post itself, the Hubbell home, the grounds, and the farm operations, for the public to understand, experience, and enjoy.
- Conserve and continue Hubbell Trading Post as a live, operating, dynamic, and functioning economic and social institution and a way of life, in the tradition of an earlier era of Southwest American Indian, Spanish, and Euro-American history.
- Identify and use Hubbell Trading Post as a preeminent site from which to interpret and understand the history, culture, and ethnography of American Indians, particularly the Navajo (Diné).



- Preserve the intangible elements important to the heritage and relationships found in the American Southwest, such as the links between cultures and traditions; a place for socializing, learning, and exchanging information; and an atmosphere of trust and friendship.

Significance statements describe why an area is important within a global, national, regional, and system-wide context and are directly linked to the purpose of the historic site. These statements are substantiated by data or consensus and reflect the most current scientific or scholarly inquiry and cultural perceptions, which could have changed since the park's establishment.

- **Trading Post Operations.** Hubbell Trading Post is the oldest and longest continuously operated traditional trading post in the American Southwest. J. L. Hubbell established this internationally recognized site in

1876 as a center of commerce for the Navajo people.

- **Structures.** In continual use since the 1800s, the masonry and adobe buildings and structures at Hubbell Trading Post National Historic Site represent styles of workmanship constructed from readily available materials that reflect various cultural architectural traditions. The buildings have the highest integrity, with the most intact and best examples of an evolving American Southwest trading post complex.
- **Cultural Landscape.** Hubbell Trading Post National Historic Site is an exceptionally intact homestead relating to a late 19th-century trading post. The landscape includes natural and cultural features, such as terraced farmlands, authentic buildings, structures, and objects, and the Pueblo Colorado Wash. The landscape provides a connection that evokes a strong sense of place.

- **Museum Collection.** The Hubbell Trading Post National Historic Site museum collection is the largest and most comprehensive record of a trading business in the American Southwest. Its combination of furnishings, archives, objects, and oral histories represent the most complete record of a family trading business and its role in a local community. The museum collection is an essential part of and contributes significantly to the integrity of the Hubbell family trading business record.
 - **People.** Hubbell Trading Post continues to be community focused; a place where traders, Native Americans, and patrons (artists, community members, and visitors) can meet to share ideas, socialize, and continue traditional trading practices, while also adapting traditional trading core values to an evolving and increasingly technological and interconnected world. This place continues to be a crossroad of culture and settlement.
1. The stories of this place, beginning long before the Indian trader era, provide an opportunity to learn about the lifeways of Southwestern Native American tribes, in particular the Navajo people.
 2. The history of J. L. Hubbell’s trading activities and his trading post speaks to how successful traders understood and continue to understand the critical importance of respecting and serving the community. Traders act as key intermediaries and agents of change among Southwest American Indians, Hispanics, and Euro-Americans; understanding the history of Indian trading is an important way to appreciate the history of relations among these cultures.
 3. Hubbell Trading Post National Historic Site is a living reminder of a time of transition — when Navajo life evolved from a time of war and conflict to a time of greater security and unity of life built around community. Hubbell Trading Post continues to serve as a community center today.
 4. The long and continuing success of the Hubbell Trading Post is the result of the trader and his/her efforts, working in partnership with artists, to raise the visibility and appreciation of their art and gain worldwide recognition. Visitors have the opportunity to directly interact with weavers and other Native American artists to help them understand each artist’s methods and motivation and the role art plays in their families, in the community, and the culture overall.
 5. Hubbell Trading Post National Historic Site’s cultural landscape — including the buildings, structures, and agricultural fields — is the finest example of a complete trading post homestead. The national historic site provides visitors the chance to experience an authentic operational 19th/20th-century southwestern trading post.
 6. Hubbell Trading Post National Historic Site provides a unique setting for interpreting traditional trading post

Primary Interpretive Themes

Identification of primary themes is part of a park’s basic foundation statement. Themes are derived from — and should reflect — park significance. Additional perspectives can be obtained from the identification and analysis of fundamental and other important resources and values. Primary themes should be few enough in number to provide focus for the interpretive program, but numerous enough to represent the full range of park significance.

Interpretive theme statements for Hubbell Trading Post National Historic Site were defined in its 2007 *Comprehensive Interpretive Plan* and are listed below. Every visitor should have the opportunity to explore these themes through the park’s personal services programs, the interpretive media, and/or the resources within the national historic site. These themes are critical to public’s understanding of the site’s significance.

operations, the interactions between Euro-Americans and Native Americans (especially the Diné/Navajo) as pertains to trading, and the values associated with these operations. Hubbell Trading Post is the only national park system unit in which visitors can directly observe and participate in ongoing buying and selling of quality Native American arts and crafts.

Special Mandates

Special mandates are specific legislative, judicial, or administrative instructions or agreements that directly influence park operations. At Hubbell Trading Post NHS, special mandates center on the relationship between the National Park Service and the nonprofit organization Western National Parks Association (WNPA), formerly Southwestern Parks and Monuments Association. In this relationship, the business operations of the trading post and visitor center sales area are the responsibilities of WNPA. They are required to operate a viable and accountable business that generates a sustainable income that benefits the nonprofit organization and native artisans. The NPS role in this relationship is to operate the national

historic site by providing interpretive and curatorial services, maintaining and preserving the historic structures, and ensuring public safety and security.

The following agreements reflect this working relationship:

1985 Cooperating Association Agreement —

Guidelines for operating the trading post — the agreement stipulates that operations will be based on historic traditions at Hubbell Trading Post, while allowing for a continuing evolution of its practices, to ensure the perpetuation of an active trading post for interpretation to the public.

2005 Task Force Report for the Operation of the Trading Post at HUTR NHS — the report recommends the development of a historic furnishings plan, a scope of sales statement, and an operations plan (internal standard operating procedures).

2005 *Scope of Sales Statement*, HUTR NHS — the statement presented revised procedures for trading post operations to ensure greater accountability and financial accuracy.

Part Two — Fundamental Resources and Values Analysis

Fundamental resources and values should be a relatively short list of resources or values considered to be critical to achieving the historic site's purpose and maintaining its significance. Fundamental resources and values elaborate on what is most important about the historic site, to ensure that specific features, systems, processes, experiences, stories, scenes, etcetera, are adequately addressed in planning and management. Identifying the fundamental resources and values helps ensure that all planning is focused on what is truly most significant about the historic site. Because fundamental resources and values directly relate to the historic site's purpose and significance, the loss or degradation of these resources and values would compromise the purpose and significance.

For every fundamental resource and value some basic analysis was completed to identify current conditions, potential threats, the level of stakeholder interests, and existing policy guidance. This analysis identifies basic management strategies and/or those issues that need to be resolved before a management strategy can be established. This basic analysis also identifies information gaps and the need for a general management plan.

In some parks, fundamental resources and values can combine to create process. For example, at the Grand Canyon, time and water combine in the process of erosion that is fundamental to the park's purpose and significance. At Hubbell Trading Post NHS, physical resources often combine with human behavior to create *sociocultural processes*, such as trading practices and the relationship among

the trader, artisans, and local community members. These processes are ephemeral, but they are at the heart of what “drives” Hubbell Trading Post, and they are fundamental to the site's purpose.

Significance Statement 1. Trading Post Operations

Hubbell Trading Post is the oldest and longest continuously operated traditional trading post in the American Southwest. J. L. Hubbell established this internationally recognized site in 1876 as a center of commerce for the Navajo people.



Fundamental Resources and Values

Traditional trading post operations form a fundamental sociocultural process that directly supports the historic site's purpose and significance. Without these practices — and the setting in which they occur (specifically, the rug room, trader's office, bullpen, wareroom and the rugs, paintings, silver jewelry, weaving-related supplies, and groceries they contain — Hubbell Trading Post would cease to be

Hubbell Trading Post. During the analysis of this fundamental value, three related subprocesses that sustain business operations at Hubbell Trading Post were identified as follows:

Trading Practices — Hubbell trading operations provide a setting where relevant trading practices and protocols are both sustained and allowed to respond to changing social and economic conditions. Traditional trading practices and protocols perpetuate the historical socioeconomic relationship among the trader, native artisans, and local community members.

Cultural Context/Authentic Setting — The trading complex maintains and promotes an authentic backdrop for social interactions and information exchange traditionally associated with and vital to Hubbell trading operations. Socialization between Euro-Americans and native peoples, often in native languages, supports and sustains the intercultural relations and cross-pollination of ideas that have always characterized Hubbell trading operations.

Community Service — Trading operations continue to supply products and services that are relevant to artisans and local community members. The trading post offers dry goods, groceries, weaving supplies, and ceremonial items that satisfy the needs of local community members. Providing traditional economic services (e.g., check cashing, donations of tribal ceremonial materials) supports and sustains the relationship among the traders, artisans, and local community members.

Importance of Fundamental Resources and Values

Trading Practices

- Trading post operations are important because they foster an environment where the tradition of trading can continue and respond to changing economic conditions and markets.

- The trading post operations provide a setting where fair trade and fair price,² trust and respect, and hospitality and politeness can continue to be practiced to perpetuate the relationship between the trading post and the local community that was established by Juan Lorenzo Hubbell.

Cultural Context/Authentic Setting

- The trader's office and rug room provide an authentic setting where artisans' wares can be displayed and purchased, benefiting artisan incomes and local community economies and allowing visitors to purchase high-quality Southwestern arts and crafts.
- Preserving the tradition of offering high-quality jewelry, rugs, ceramics, and baskets sustains the historic site's reputation as an authentic Southwestern trading post.
- The entire trading post complex allows visitors to observe trading operations in a realistic and accurate setting, affording them opportunities to make deeper connections with the trading post, its resources, and its history.

Community Service

- The bullpen continues to serve local customers and artisans by providing dry goods, groceries, weaving supplies, and items needed for ceremonial purposes. Some of these items are not available at other local retail outlets.
- Trading operations serve the local communities, because they offer a forum for generating income, socialization, information sharing, and other economic services.

² Fair trade/fair price — purchasing artisan wares at competitive wholesale prices and selling objects with a reasonable retail markup.

Current Conditions, Related Trends, and Potential Threats

Trading Practices

- Artisans continue to use the trading post as a retail outlet for their wares.
- Regional traders and wholesale dealers continue to come to the trading post for business transactions.
- The range of rugs, jewelry, ceramics, and baskets in the trading post's inventory are similar in number and kind to historical inventories.
- Operations of the trading post continue to be managed by Western National Parks Association (WNPA).
- New WNPA business procedures have changed the relationship among traders, artisans, and local customers (see fundamental resources in Significance Statement 5 — People), causing some artisans and customers to take their business to other vendors.
- There are fewer apprentice artisans, placing the future production and trade of high-quality, authentic native Southwestern arts and crafts at risk. This situation could be a result of the decrease in the number of individuals fluent in Navajo and other traditional languages, because native arts and crafts historically were taught in native languages.
- The number of qualified Southwestern traders fluent in Navajo has likewise decreased.
- Most trade transactions used to be conducted in Navajo, but this is no longer the case. Some artisans believe that this change has weakened their relationship with the traders.

Cultural Context/Authentic Setting

- Artisans and local customers continue to come to the trading post for social reasons, but some feel the environment is not as welcoming as it was in the past.

- Most visitors still access the national historic site via private vehicles, however, an increasing number of tourists are arriving on commercial tour buses. Visitation pulses from the number of people on the buses can distract trading negotiations and strain the national historic site's infrastructure (e.g., availability of restrooms and crowded conditions in the rug room and bullpen).
- Visitation to the national historic site is decreasing.

Community Service

- Artisans can bring their arts and crafts to sell. Groceries, dry goods, and arts, crafts, and ceremonial supplies are available — although some lines could be expanded (e.g., arts and crafts supplies and clothing).
- Longstanding traditions, such as trust, respect, hospitality, and politeness are highly valued by local customers, but many local customers and artisans feel these traditions are changing.
- Earlier, the trading post served as a social center where information could be shared and other services (postal services, check cashing, and so on) could be obtained. Many local customers and artisans would like to see these social aspects of trading post operations reinstated or strengthened.
- The lack of proximal, wholesale outlets requires sales merchandise to be shipped in, which increases their costs. Strong competition from convenience stores and other retail outlets makes bullpen sale items appear to be limited and more costly.



Stakeholder Interest

- Local customers — Local customers have a strong interest in maintaining the more than 100-year tradition of fair trade/fair price and the relationship between the traders and local communities established by J. L. Hubbell.
- Artisans — Similar to local customers, artisans greatly value the concept of fair trade/fair price and value the traditions of trust, respect, hospitality, and politeness. They also value trading operations as a way to market and sell their wares. Because many artisans become local customers after a trade transaction, they also value the social and economic services associated with the trading post. Like local customers, many artisans perceive that these traditional values and services might be changing.
- Local/Nonlocal Visitors — Regional, national, and international visitors come to the national historic site to enjoy the opportunity to see, hear, and to a certain extent, interact with American Indians. Being able to hear and observe trade negotiations and social conversation, seeing crafts being made onsite at the visitor center, and having items on display and available for purchase adds depth and value to the visitor experience.
- WNPA — The nonprofit cooperative association has an interest in both attracting high-quality and well-recognized artisans to the trading post for trade as well as maintaining a sustainable and accountable business operation.
- Art Collectors/Retailers — Collectors and retailers continue to come to the trading post to sell and purchase items,

because of the trading post’s strong reputation for dealing in high-quality Southwestern arts and crafts.

- Other Traders — Regional trading operations depend on extensive information sharing and networking. Hubbell Trading Post is an important player in this network. The trading post’s role in trading and the history of trading is greatly respected among other traders.
- Hubbell Descendents — Great-great-grandchildren and other Hubbell descendents value and enjoy the fact that the trading traditions established by J. L. Hubbell are being perpetuated.
- Friends Groups — Friends of Hubbell Trading Post NHS, Inc., and other friends groups have an interest in sustainable trading operations that promote the trading post’s reputation for dealing in high-quality arts and crafts. Annually these groups host fund-raising events for the national historic site. The trading post’s reputation is a major draw for these events.

Desired Conditions

Trading Practices

- Trading practices are predicated on the concepts of trust and respect, hospitality and politeness.
- Trading post operations conform to the legislation, special mandates, policies, and guidelines found under “Relevant Laws and Regulations” and “Existing Planning Guidance” sections for this significance statement.
- All levels of artisan expertise (“trainees” through recognized experts) are supported by trading operations through fair trade and fair prices.
- Trade transactions are conducted in Navajo or through a qualified interpreter.
- Traditional trading practices, as outlined in the 2005 *Guidelines*, are preserved as much as possible.

Cultural Context/Authentic Setting

- Artisans, local customers, and visitors are treated with respect in an open, courteous, and hospitable environment.
- Visitors have the opportunity to observe traditional trading practices firsthand in an authentic setting.
- Visitors and customers have the opportunity to purchase high-quality Southwestern Indian arts and crafts at a fair price and in a wide range of prices.

Community Service

- Local customers have access to affordable desired and specialty items (e.g., weaving supplies and ceremonial items).
- Trading operations support traditional social and economic services for the local communities (e.g., information sharing, postal services, and economic exchanges).
- The range of weaving and ceremonial supplies and other traditional wares available in the bullpen is expanded and tailored to the needs and desires of local community members.

Strategies

Trading Practices

- Support traditional and evolving new Southwestern Indian designs and produce authentic, high-quality arts and crafts.
- Develop and implement a trader mentoring program (“Train the Trader”) to ensure that qualified traders are available in the future. Foster and encourage a similar community-based program for native artisans.
- Review the WNPA 2005 Scope of Sales and amend it if needed.

Cultural Context/Authentic Setting

- Staff should be aware of potentially disruptive visitation pulses.
- Continue the practices of onsite weavers, conducting trade negotiations in native languages, acquiring/selling traditional wares, such as jewelry, rugs, ceramics, and baskets, supporting the production of traditional as well as new designs.

Community Service

- Maintain good relationships with the community, through NPS and WNPA staff participating in community activities (e.g., attending community functions, contributing to community functions, and supporting local activities).
- Obtain feedback from local community members on the types of retail items that should be available in the bullpen.
- Explore partnering with other regional and local retail suppliers to reduce costs of items sold in the bullpen.
- Allow traditional trading economic exchanges to occur to support community needs (as outlined by Landrum 2005).

Relevant Laws and Regulations

(see appendix C for brief descriptions of laws and regulations)

- Indian Arts and Craft Act (18 U.S.C. Chapter 53 Indians)
- Federal Trade Commission Guideline
- IRS Code for Nonprofit Organization (501c3)
- Director's Order 32: Cooperating Associations
- NPS 2006 Management Policies

Existing Planning Guidance

(see appendix D for descriptions of existing guidance)

1985 Cooperating Association Agreement

2005 Guidelines for Preserving Traditional Trading Practices, Historic Furnishing, and Character at Hubbell Trading Post

2005 WNPA/NPS Task Force Report for the Operation of the Trading Post

2005 *NPS/WNPA Scope of Sales Statement*

2006 Hubbell Trading Post NHS Draft Strategic Plan (7/25/06)

2007 *Scope of Collection Statement*

Needed Planning and Guidance/Data and Analysis Needs

- Policy Guidance Review — A number of recent and ongoing planning efforts and special mandates were developed independent of each other. Several of these, including the WNPA Task Force Report and Scope of Sales and the Guidelines for Traditional Trading Practices, provide conflicting guidance on trading post operations. In addition, several new plans have been developed recently or are in draft form (e.g., a historic furnishings plan, comprehensive interpretive plan, scope of collection statement, strategic plan, and farm plan). These documents should be reviewed to ensure they logically nest under the foundation document and that any policy guidance discrepancies are resolved.
- Visitor Experience Assessment — Visitation at the trading post has decreased over the last five years. Visitor expectations as compared to actual experiences need to be assessed.

Significance Statement 2. Structures

In continual use since the 1800s, the masonry and adobe buildings and structures at Hubbell Trading Post National Historic Site represent styles of workmanship constructed from readily available materials that reflect various cultural architectural traditions. The buildings have the highest integrity, with the most intact and best examples of an

evolving American Southwest trading post complex.

Fundamental Resources and Values

The buildings and structures listed as contributing elements in the Hubbell Trading Post National Historic District (see Landrum 2002 and appendix F) are fundamental resources for the national historic site. During analysis, these resources were grouped into two related subgroups: Structural Integrity and Historical Context, and Vernacular Architecture and Workmanship.

Importance of Fundamental Resources and Values

Structural Integrity and Historical Context

- The buildings, structures, and features provide an intact, tangible record of the trading post complex's development and evolution. Their structural integrity, variety, and configuration create a physical connection that can be seen, smelled, and touched. Collectively, the structures help preserve and maintain the historic site's sense of place as an isolated, but functioning, trading post.

Vernacular Architecture and Workmanship

- The structures in the historic district physically record the materials, construction methods, and workmanship used to create the vernacular architecture that visually defines the trading post's sense of place and regionally represents the most complete example of a Southwestern trading post complex.

Current Conditions, Related Trends, and Threats

Structural Integrity and Historical Context

- The structures are open to the public and are used in daily activities. Foot traffic and other human contact by visitors, customers, and NPS staff results in inevitable damage to the structural fabric of the buildings. This is



especially true for the trading post, Hubbell home, visitor center, and restrooms.

- The structures exist in an uncontrolled, open-air environment and are subject to dramatic fluctuations in temperature and humidity and other environmental factors such as sunshine and high winds. These factors continually weaken the fabric of the structures.
- Despite visitation and environmental impacts, the overall condition of most structures is good to fair.
- Ongoing and proactive preservation maintenance mitigates many of the negative impacts to structures and should continue at a high level perpetually.
- Some of the historic structures pose health and safety issues. Some lack adequate fire suppression systems. Most need to be inspected for hazardous materials and, where found,

mitigated. Not all structures are accessible as required by the American's with Disabilities Act (ADA).

Vernacular Architecture and Workmanship

- The current maintenance staff has an extensive knowledge base on preservation maintenance and the structures' specific needs. This knowledge base needs to be passed on to others when staffing changes occur (e.g., adequate transition periods, mentoring, formal documentation, oral history exit interviews, etcetera).
- Preservation activities are sometimes hampered by the lack of availability of in-kind building materials and funding limitations.

Stakeholder Interest

- NPS — NPS staff recognizes the architectural, historical, and interpretive value of the historic structures and value their own roles as resource stewards.
- Artisans and Local Customers — Artisans and local customers value the historic district as a physical connection to the 100-plus-year tradition of Southwestern Indian arts and crafts production and trade. They have a strong interest in the trading post and bullpen continuing to be locations where they can sell their wares and purchase groceries and dry goods.
- Schools — Local schools value the historic structures because they provide a setting for interpretive field trips that enhances their educational programs.
- Researchers — Researchers value the historic structures because they provide a record of the construction methods and materials used at the trading post complex that can be instructive and used to help preserve other vernacular historic structures.
- Hubbell Descendents — Hubbell descendents place great value on the

structures, especially the Hubbell home, because they are enduring, physical reminders of their connections to J. L. Hubbell and his trading legacy.

Desired Conditions

Structural Integrity and Historical Context

- Structures in the historic district are preserved and maintained to retain their historic appearance and to serve as a visual portal back in time that perpetuates Hubbell Trading Post's unique sense of place and its role in the trade of Southwestern Indian arts and crafts.
- The structural integrity of the buildings is maintained as a physical record of the site's development and evolution.
- Maintenance activities conform to the secretary of the interior's standards.
- The structures are preserved and maintained to ensure they do not present threats to public safety. Where possible, the structures should be made ADA accessible (without negatively impacting the structures' historic integrity).
- An up-to-date fire suppression plan is in place for structures in the historic district.
- Hazardous materials have been removed from all historic structures.
- Traditional trading operations take place in the trading post. The Hubbell home is used to interpret the activities of the Hubbell family and those of their many visitors. Other structures in the historic district are adaptively reused for other park functions (e.g., interpretation, storage or office space, housing livestock), while maintaining their exterior historical appearance.

Vernacular Architecture and Workmanship

- The structures are maintained using in-kind structural materials to preserve the vernacular architecture.

- The multicultural, vernacular workmanship evidenced in the structures is preserved.

Strategies

Structural Integrity and Historical Context/Vernacular Architecture and Workmanship

- Continue a proactive historic preservation and stabilization program to ensure the structures retain their historical integrity.
- Develop a system that ensures that the current structural maintenance preservation knowledge base is transferred to new NPS maintenance staff.
- Explore options for making structures in the historic district more ADA accessible.
- Survey historic structures for hazardous materials and develop/implement a hazmat removal plan.
- Develop a structural fire plan and conduct annual fire suppression evaluations.

Relevant Laws and Regulations

(see appendix C for brief descriptions of laws and regulations)

- Antiquities Act of 1906 (P.L. 59-209, 34 Stat. 225)
- National Park Service Act of August 25, 1916 (P.L. 64-235, 39 Stat. 535)
- Historic Sites Act of 1935 (P.L. 74-292, 49 Stat. 666)
- National Historic Preservation Act of 1966 (P.L. 89-665, 80 Stat. 915; as amended by P.L. 91-243, P.L. 93-54, P.L. 94-422, P.L. 94-458, P.L. 96-199, P.L. 96-244, P.L. 96-515, P.L. 98-483, P.L. 99-514, P.L. 100-127, and P.L. 102-575)
- *Secretary of the Interior Standards and Guidelines for Archeology and Historic Preservation*

- Archaeological Resources Protection Act of 1979 (P.L. 96-95; 93 Stat. 712): Advisory Council on Historic Preservation's implementing regulations regarding the "Protection of Historic Properties" (36 CFR 800)
- 36 CFR 60 (NHPA and EO 11593), "National Register of Historic Places"
- 36 CFR 63 (NHPA and EO 11593), "Determinations of Eligibility for Inclusion in the National Register of Historic Places"
- 36 CFR 65 (Historic Sites Act of 1935), "National Historic Landmarks Program"
- 36 CFR 800 (NHPA and EO 11593), "Protection of Historic and Cultural Properties"
- Memorandum of Agreement among the NPS, Advisory Council on Historic Preservation, and the National Council of State Historic Preservation Officers (1995)
- Executive Order 11593: Protection and Enhancement of the Cultural Environment
- Director's Order 28: Cultural Resource Management and Cultural Resource Management Guideline
- Director's Order 13B: Solid and Hazardous Waste Management
- Director's Order 50B: Occupational Safety and Health Program
- Director's Order 42: Accessibility for Park Visitors
- Director's Order 58: Structure Fire Management
- Director's Order 77-7: Integrated Pest Management
- Director's Order 83: Public Health
- *NPS 2006 Management Policies*
- USC 19jj Park System Resource Protection Act
- Title 36 of the Code of Federal Regulations

Existing Planning Guidance

(see appendix D for descriptions of existing guidance)

- 1980 Fire Suppression System Design Analysis, Historic Structure Report
- 1984 Historic Preservation Guide, Part I, Preventive Maintenance System
- 1984 Historic Preservation Guide, Part II, Reference Support Record Systems, HUTR NHS
- 1986 Statement for Management, HUTR NHS
- 1971–1979 Historic Structures and Furnishing Reports
- 1992 HUTR NHS Scope of Collection Statement
- 1993 HUTR NHS: An Administrative History
- 1997 Long-Range Interpretive Plan, HUTR NHS
- 2000 HUTR NHS Strategic Plan 2000–2005
- 2002 Hubbell Trading Post Landscape, Cultural Landscape Inventory
- 2002–2005 Strategic Plan, HUTR NHS
- 2006 Hubbell Trading Post NHS Draft Strategic Plan (7/25/06)
- 2006 Interim Historic Furnishings Plan
- 2007 Scope of Collection Statement
- 2007 Comprehensive Interpretive Plan

Needed Planning and Guidance / Data and Analysis Needs

- Update or prepare new historic structures reports, including extensive photographic documentation of structural construction.
- Complete an asset management plan for the historic district (can include all structures in the national historic site).
- Conduct a condition assessment of the historic district structures for FMSS.
- Prepare a park asset management plan.

- Develop a structural fire plan appropriate for the historic district structures district (can include all structures in the national historic site) and implement annual testing and evaluation procedures.
- Develop and implement an integrated pest management (IMP) plan appropriate for structures in the historic district (can include all structures in the national historic site).
- Develop a hazardous materials removal plan appropriate for the historic district structures district.
- Develop memorandums of understanding with local groups, other parks, the Navajo Nation, and NPS Santa Fe preservation office to share maintenance-related equipment and resources (personnel) that would support the national historic site's maintenance program.

Significance Statement 3. Cultural Landscape

Hubbell Trading Post National Historic Site is an exceptionally intact homestead relating to a late 19th-century trading post. The landscape includes natural and cultural features such as terraced farmlands, authentic buildings, structures, and objects, and the Pueblo Colorado Wash. The landscape provides a connection that evokes a strong sense of place.

Fundamental Resources and Values

Collectively, the historical structures such as the barn and headgates, objects such as wagons and farm equipment, land-use patterns, agricultural fields and features, vegetation and hydrology, and surrounding vistas that make up the national historic site's cultural landscape (Landrum 2002) are fundamental resources. Specifically, the trading post's entrance road is a portal that makes one feel he or she is traveling back to an earlier time when Lorenzo Hubbell's presence influenced and guided Southwestern trade practices. At the

same time, the trading post continues to be a site where cultures meet and the strong traditions of trade and socialization persist in a contemporary world. The juxtaposition of these two elements — largely influenced by the physical and intact cultural landscape — gives the trading post complex a feeling that cannot be duplicated anywhere else. The richness of the cultural landscape allows individuals the intangible and tangible experiences of engaging in a living trading post operation.



Importance of Fundamental Resources and Values

- The cultural landscape’s structures, agricultural fields and irrigation system, historic farm equipment, livestock enclosures, small-scale features, and far-reaching vistas allow visitors to visualize how the cultural landscape was used historically.
- The range of landscape features underscore the myriad activities needed to support the trading post, its freighting operations, and its network of other trading posts in a remote and rugged region.
- The largely intact cultural landscape features represent one of the most complete examples of a trading post “homestead.”

Current Conditions, Related Trends, and Threats

- NHS staff is involved with stream restoration activities along Pueblo Colorado Wash, with special emphasis on diminished bank erosion and the removal of exotic invasive species.
- The Ganado Dam, once an integral part of the post’s historic irrigation system, was in disrepair and nonfunctional for several decades. The Bureau of Reclamation repaired the dam in 1995. By 2000 irrigation water was restored

and is now the source of water for Hubbell’s agricultural fields.

- Agricultural fields and gardens are cultivated annually to illustrate other traditional trading post activities.
- Livestock and other animals are maintained onsite as reminders of Hubbell livestock and freight operations, and they underscore the need for the post to be largely self-sufficient.
- A state highway bridge, proposed for construction in 2010, will affect the landscape’s views and vistas and could increase erosion in Pueblo Colorado Wash unless adequate erosion control measures are in place.
- The presence of upstream exotic invasive vegetation (Russian olive, tamarisk, thistle, noxious weeds, and so on) poses risks to the landscape’s integrity by decreasing its biodiversity and outcompeting native species.
- Flash floods resulting from the channelization of Pueblo Colorado Wash continue to pose threats of erosion and deterioration in the wash. Heavy rain runoff also poses threats to the road and surrounding fields. Conversely, during non-rainy seasons, there is a lack of water in the wash, because of diversion to upstream



irrigation systems. This potentially could negatively impact the stream's health in stretches going through the national historic site.

- The potential for wildland fires and other natural disasters poses a threat to the landscape.
- Preserving the cultural landscape and expanding farming activities would offer partnership opportunities with the local communities. Expanded livestock activities also would allow new interpretive events, such as sheep-to-rug demonstrations. However, maintaining an active farm would result in operational costs exceeding the national historic site's budget.
- Vintage farm equipment and some small-scale landscape features (fences, headgates, and ditches) are at risk from exposure to the elements and are deteriorating.

Stakeholder Interest

- NPS Staff — The NPS staff members have an interest in preserving the cultural landscape because it is a key element in maintaining the trading post's sense of place.

- Local Community — Community members value the cultural landscape because they have strong social and cultural ties to it.
- Ganado Water Users Association/Farm Board — The board has an interest in the restoration and management of Pueblo Colorado Wash and surrounding watershed to ensure that adequate resources are available to the community.
- Visitors – Visitors have an interest in preserving the cultural landscape

because it augments their experience of the trading post.

- Researchers – Researchers might value the cultural landscape as a site where they could observe natural and cultural processes and provide educational opportunities in agricultural and animal husbandry.
- Schools — Schools value the trading post as a field trip destination. Preserving the trading post's sense of place is vital to the success of these excursions. Expanded farming operations would offer hands-on opportunities for environmental and agricultural education for special groups such as the Future Farmers of America and others.
- Special Interest Groups — There are a variety of stakeholder groups who have interests in such things as the preservation of heritage species or varieties, traditional agriculture/animal husbandry, traditional arts and crafts, environmental conservation, and sustainable land management practices.
- Hubbell Family Descendents — Descendents continue to have personal memories and connections to the

cultural landscape and value its continued protection.

Desired Conditions

(management within existing law and policy)

- The cultural landscape and its character-defining features are preserved and maintained to the highest standard possible, consistent with their significance and interpretive value.
- Exotic invasive species are removed, erosion is diminished or is under control, and the “health” of the wash and surrounding watershed is sustainable and supports a healthy riparian and upland habitat.
- Agricultural restoration efforts are self-sustaining.
- Historically accurate plantings (e.g., orchards, shrubs, and vegetable garden) are reintroduced or maintained.
- Expanded farming and animal husbandry and stream restoration activities offer scientific, economic, and agriculture-related education opportunities for the local communities and schools. The interpretive program is expanded to include these activities.
- The public has an opportunity to explore more of the cultural landscape via a trail that permits circulation through Pueblo Colorado Wash and possibly the surrounding landscape.
- The public understands and appreciates the significance of the cultural landscape and values and their connections to it. Through understanding and appreciation, the public could actively participate in the protection of park resources.

Strategies

(management within existing law and policy)

- The cultural landscape has been inventoried and assessed for National Register significance. A National Register nomination form needs to be

prepared and submitted to the state historic preservation officer for a formal listing on the National Register of Historic Places.

- Encourage planting and use of traditional and native plants in the cultural landscape and wash environs.
- Develop a business plan for the farm to supplement the existing farm plan, to ensure the farm is self-sufficient.
- Continue stream restoration and maintain exotic invasive species removal.
- Plant biodiverse and heritage-relevant species/varieties and apply the same strategy to livestock.
- Reintroduce/maintain historically accurate plants (e.g., orchards, shrubs, and vegetable garden).
- Develop a trail that allows people to walk throughout the cultural landscape and wash.
- Involve community through educational workshops and events that are associated with the landscape and wash.
- Develop a long-term programmatic agreement with the Navajo tribal historic preservation officer (THPO) for the maintenance of historic structures and cultural landscape.

Relevant Laws and Regulations

(see appendix C for brief descriptions of laws and regulations)

- National Historic Preservation Act of 1966, as amended
- Archeological Resources Protection Act
- Advisory Council on Historic Preservation’s *Regulations for the Protection of Historic and Cultural Properties*
- *Secretary of the Interior’s Standards and Guidelines for Archeology and Historic Preservation*

- *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes*
- *NPS Management Policies 2006*
- EO 13007, American Indian Sacred Sites
- American Indian Religious Freedom Act
- Native American Graves Protection and Repatriation Act
- National Environmental Policy Act
- 36 CFR
- NPS Organic Act
- EPA for hazardous material/insecticide, Clean Water act, Clean Air Act
- Park System Resource Protection Act (16 USC 19jj)
- Director's Order 6: Interpretation and Education
- Director's Order 24: *Museum Collections Management and the NPS Museum Handbook*
- Director's Order 28, *The Cultural Resources Management and Cultural Resources Management Guideline*
- *Director's Order 42: Accessibility for Park Visitors*
- *Director's Order 53: Special Park Uses*
- Director's Order 71A: Government to Government Relationships with Tribal Governments
- Director's Order 75A: Civic Engagement and Public Involvement
- Director's Order 77: Natural Resource Protection and NPS Reference Manual 77: Natural Resource Management
- Director's Order 77-2: Floodplain Management
- Director's Order 77-3: Domestic and Feral Livestock Management
- Director's Order 77-6: Cooperative Research and Development Agreements

Existing Planning Guidance

(see appendix D for descriptions of existing guidance)

- 1992 HUTR NHS Scope of Collection Statement
- 1993 HUTR NHS: An Administrative History
- 1997 Long-Range Interpretive Plan, HUTR NHS
- 1998 Cultural Landscape Report, Hubbell National Historic Site, Cultural Resources Selection No. 14
- 2000 HUTR NHS Strategic Plan 2000–2005
- 2002 Hubbell Trading Post Landscape, Cultural Landscape Inventory
- 2002 Pueblo Colorado Wash Restoration Environmental Assessment
- 2005 Hubbell Trading Post Farm Plan
- 2006 Hubbell Trading Post NHS, Draft Strategic Plan (7/25/06)
- 2007 Comprehensive Interpretive Plan
- 2007 Draft Exhibit Proposal

Annual Compliance document for THPO for Routine Maintenance/Funded Maintenance Projects for Historic Structures and the Cultural Landscape.

Needed Planning and Guidance / Data and Analysis Needs

- Farm business plan — If farming and animal husbandry activities are expanded, there will be a need for a farm business plan to ensure these activities are carried out cost effectively and that the activities are economically sustainable. The plan should be based on industry standard animal and crops best practices.
- Pueblo Colorado Wash Trail plan/environmental assessment (EA) — If the decision is made to construct a trail in the wash, a plan/EA will need to be developed.

- Vegetation management inventory and plan — Much of the native and historic vegetation has been altered or lost over time. A vegetation inventory of the cultural landscape should be conducted to identify native and historic plants or heritage/heirloom species/varieties still existing. The inventory data, supplemented with ethnographic data and historical documentation, should be used to develop a vegetation plan for reestablishing and maintaining ethnographic/ heirloom vegetation and historical plantings in the trading post complex (e.g., ornamental trees, orchards, shrubs, and vegetable garden).

Significance Statement 4. Museum Collection

The Hubbell Trading Post National Historic Site museum collection is the largest and most comprehensive record of a trading business in the American Southwest. Its combination of furnishings, archives, objects, and oral histories represent the most complete record of a family trading business and its role in a local community. The museum collection is an essential part of and contributes significantly to the integrity of the Hubbell family trading business record.

Fundamental Resources and Values

Museum objects relating to the Hubbell family and their trading operations are fundamental to the national historic site's purpose and significance. The museum collection contains a wide range of other significant objects, artifacts, and archives. Some of these include artifacts recovered from archeological sites in the national historic site as well as early administrative records. These objects are significant and are protected by legislation. However, only those objects relating directly to the Hubbell family and trading operations are fundamental to the site.



Importance of Fundamental Resources and Values

- Museum objects relating to the Hubbell family and their trading operations reflect the family's interests, activities, and contributions to the evolution of Southwestern trading practices. They also allow the trading post complex, and especially the Hubbell home, to be furnished to create an authentic setting that visitors can see, feel, and in some cases, touch.
- The artifacts, art, furnishings, historic farm equipment, archival materials, and oral histories in the museum collection document and preserve the history of exchange between the local community and traders.
- The collection affords the public the opportunity to experience an authentically furnished trading post and associated structures.

- The cataloged museum objects offer unique research values from a historic trading operation.
- The museum storage facility protects and preserves the personal assets of Hubbell trading operations (including freight and farming equipment) and the Hubbell family (including fine arts, furnishings, and ephemera).

Current Conditions, Related Trends, and Threats

- The overall condition of the collection is good, owing to the conservation work that has been performed on artifacts over the years and to the national historic site's high-quality storage facility and the ongoing curation program.
- The collection has ongoing conservation needs. This is especially true for freight and historic farm equipment, which is typically displayed outdoors in minimally controlled environmental conditions that eventually will lead to some degradation. Additional staff is needed to carry out cleaning and other conservation activities on collection artifacts.
- The collection contains oral histories, which are expanded as circumstances permit. The oral history magnetic tapes are subject to deterioration and need to be transferred to a digital format. The condition of these histories is inspected as part of the ongoing curation and monitoring program for the collection.
- The current number of curatorial staff is only moderately adequate; additional staffing would be beneficial (see below).
- The curatorial staff ensures the security and safety of the collection and keeps the collection readily available to other stakeholders. However, many museum objects that are accessible to the public, such as exhibited artifacts in the trading post complex, are at risk of loss. In addition, natural disasters, fires, and

other catastrophic events are an ongoing threat to the collection and exhibited artifacts.

- The collection is available to the interpretive staff to carry out their interpretive job responsibilities.
- Much of the Hubbell family business records and other archival materials are in storage at the University of Arizona under a long-term loan agreement between the university and the National Park Service.

Stakeholder Interest

- Park Staff and Museum Volunteers in Park (VIP) — The curatorial and interpretive staffs value the collection for its historical, scientific, educational, and interpretive values.
- Artisans/Local Community — Artisans and local community members value objects on exhibit and in storage because they are physical reminders of the past and the relationship between trader, artisans, and local community members. Oral histories maintained in the collection are largely the histories of individuals in the surrounding communities. They document many cultural traditions that today are at risk of being lost and could be a valuable resource for future generations. Local artisans value the collection, because they can use collection objects as reference materials in the production of traditional arts and crafts.
- Tribal Governments — Tribal government representatives have an interest in the collections because they contain many objects that are culturally sensitive and of value to local tribal people. Museum staff members work with tribal government representatives to ensure that these objects are protected and that information about them is shared with sensitivity and tribal input.
- Nonlocal Visitors — Tourists value the museum objects that are on display

because they greatly add to the visitor experience by providing heritage context and tangible connections with the past.

- School/Public Outreach — Schools have an interest in the collections because they can serve as useful educational tools for school programs.
- University of Arizona — The university has an interest in the collection because many of the archival materials in the collection document an important part of regional history.
- Researchers, Other Museums, and Other NPS Staff — Other researchers and professionals value the collection for its wide range of art, artifact, and archival materials relating to the American Southwest and the trade industry. These materials provide extensive opportunities for research and study. Researchers have an interest in the electronic catalog system used to track collection objects because it allows descriptions and images of these objects to be shared electronically. This makes the collection available to a wider range of researchers and can eliminate the need to travel to access the collection.
- Hubbell Family Descendents — Family descendents value the collection because it protects hundreds of family possessions in one location. Proper storage and conservation of these materials meets the family's expectation of good, long-term care for the objects.

Desired Conditions

(management within existing law and policy)

- Museum collections are maintained to the highest possible curation standards, consistent with their significance and their interpretive and scientific value.
- The public understands and appreciates the significance of collection objects and their connections to the trading post. Through understanding and

appreciation, the public actively participates in the protection of these resources.

- The contents of the collection are more accessible to researchers and the public (e.g., exhibits, Internet availability, and other media access).
- Weaving samples from widely recognized expert weavers are part of the collection, with their production fully documented (photographs, observations, oral history, and so on). The samples should be designs that were developed/influenced by Hubbell trading operations.
- New museum objects that provide more information on the Hubbell family are added to the collection as they become available.

Strategies

(management within existing law and policy)

- Continue ongoing curation program, supplemented with conservation actions, as funds allow.
- Train Volunteers in Parks and staff in curation procedures.
- Provide suitable security for the museum collections located throughout the park.
- Provide access to the collection's database through the Internet.
- Add to the collection using the guidelines in the revised *Scope of Collection Statement* (2007).
- Transfer oral histories on magnetic tape to a more stable medium.

Relevant Laws and Regulations

(see appendix C for brief descriptions of laws and regulations)

- NPS Organic Act
- National Historic Preservation Act of 1966, as amended
- Archeological Resources Protection Act

- EO 13007, American Indian Sacred Sites
- American Indian Religious Freedom Act
- Native American Graves Protection and Repatriation Act
- Management of Museum Properties Act (commonly known as the "Museum Act") 16 USC 18f-3, July 1, 1955 chapter 259, 69 Stat. 242
- P.L. 104-333 Advisory Council on Historic Preservation's *Regulations for the Protection of Historic and Cultural Properties*
- *Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation*
- *Secretary of the Interior's Standards for the Treatment of Historic Properties, with Guidelines for the Treatment of Cultural Landscapes*
- *NPS Management Policies 2006*
- National Environmental Policy Act
- Director's Order 24: *Museum Collections Management and NPS Museum Handbook*
- Director's Order 28, *The Cultural Resources Management and Cultural Resources Management Guideline*
- 36 CFR
- 16 USC 19jj Park System Resource Protection Act
- Copyright Act
- Director's Order 24: Standards for NPS Museum Collections Management
- Director's Order 26: Projects Must Fund Basic Preservation of Museum Collections
- Director's Order 71A: Government to Government Relationships with Tribal governments
- Director's Order 77-6: Cooperative Research and Development Agreements

Existing Planning Guidance

(see appendix D for descriptions of existing guidance)

- 1972 Furnishing Study, HB 2 The Hubbell Home
- 1979 HB 3 Barn and Blacksmith Shop, Historic Furnishing Study
- 1992 HUTR NHS Scope of Collection Statement
- 1993 HUTR NHS: An Administrative History
- 1997 Long-Range Interpretive Plan, HUTR NHS
- 2000 HUTR NHS Strategic Plan 2000-2005
- 2002 Hubbell Trading Post Landscape, Cultural Landscape Inventory
- 2005 Guideline for Preserving Traditional Trading Practices, Historic Furnishings and Character at Hubbell Trading Post
- 2006 Hubbell Trading Post NHS, Draft Strategic Plan (7/25/06)
- 2006 Interim Historic Furnishings Plan
- 2007 Comprehensive Interpretive Plan
- 2007 Draft Exhibit Proposal
- 2007 Scope of Collection Statement

Needed Planning and Guidance / Data and Analysis Needs

- Finalized Scope of Collection Statement — The 1992 *Scope of Collection Statement* defines the types of objects to be included in the museum collection, basic collection management goals, and objects. A draft revised statement needs to be finalized to update curation management goals, including the disposition of visiting artist "donations."
- Updated Collection Management Plan (CMP) — A collection management plan is an umbrella management document that broadly defines how the collection will be managed. The current CMP needs to be updated.

- Collections Condition Survey (followed by a conservation/replica protection plan) — Periodically, museum collections need to be inspected by a qualified conservator to assess their condition and identify any conservation needs. In some cases, the assessment might indicate the need for building a replica so that the original can be housed in an environmentally controlled and protected environment. Based on assessment findings, a conservation/replica production plan needs to be developed to prioritize needs and set management goals.
- Classic/Traditional Weaving Pattern Samples — Samples of classic or tradition weaving designs developed or influenced by Hubbell trading operations should be procured and added to the collection. The samples should be produced by well-respected weavers, and the production of the samples should be fully documented through narratives/photographs.
- Updated Historic Furnishings Plan — Many of the existing historic furnishing plans are dated. Also, items placed on exhibit (e.g., in the Hubbell home) have changed over time. The current or proposed collection of historic structures needs to be thoroughly documented and supplemented with contemporary photographs. This documentation will also assist in identifying/documenting any items lost through theft or deterioration.
- Visitor Center Exhibit Plan — An exhibit plan needs to be developed to support proposed design changes to the visitor center. The plan should identify items from the park collection that could be used in exhibits.
- Collection Security Plan — The collection needs a security plan that identifies who has access to the collection and establishes/updates protocols and procedures for protecting the collection and methods for reporting any losses.



- Structural Fire Plan — A structural fire plan needs to be developed for the national historic site. This plan should include an evaluation of curation facilities' current conditions as related to potential structural fire damage.

Significance Statement 5. People

Hubbell Trading Post continues to be community focused; a place where traders, Native Americans, and patrons (artists, community members, and visitors) can meet to share ideas, socialize, and continue traditional trading practices, while also adapting traditional trading core values to an evolving and increasingly technological and interconnected world. This place continues to be a crossroad of culture and settlement.

Fundamental Resources and Values

The relationships among the trader, Native Americans, artisans, and visitors form a fundamental sociocultural process that is essential to Hubbell Trading Post's ability to function as a *living* trading post. During the analysis of this fundamental value, two roles were found to be essential in sustaining this dynamic, sociocultural process that is so important in defining the national historic site's purpose and significance: Community Liaison and Trading Post Patrons.

Community Liaison — It is the trader's role as negotiator, businessman, community member, and bridge between cultures that is fundamental to successful and sustainable trading operations.

Trading Post Patrons — Native artisans and local community members form the other essential half of trading post operations. If these individuals stopped supporting the trading post, it would become just another tourist retail outlet.

Importance of Fundamental Resources and Values

Community Liaison

- The trader plays a pivotal role at the trading post and within local communities. Traditionally, the trader was an intermediary between Euro-American and native cultures and economic systems. The trader was a member of the community who took the lead in marketing and selling native arts and crafts. He earned the respect and business of artisans and local customers by ensuring the existence of fair trade practices and fair prices for arts and crafts and for items sold in the bullpen. The trader also offered social and economic services (e.g., postal service, loans, and donations of items for ceremonies). By employing tactics such as hospitality, politeness, and fairness, the Hubbell trader built and maintained a reputation of integrity in the trading industry.

Trading Post Patrons

- Artisans, community members, and visitors form the other critical portion of the relationship between the trader and native peoples. Many have deep, multigenerational connections to the trading post. They have high expectations for fair trade and a warm environment where they can socialize, exchange information, or purchase groceries and supplies. In the past, they turned to the trader for economic assistance and services. In return, they brought their business to the trader. Because artisans and local customers often are one and the same, they both play key roles in the continued production of native arts and crafts.

Current Conditions, Related Trends, and Threats

Community Liaison

- The trader is no longer a sole proprietor but is an employee of WNPA.
- Traditionally, the trader spoke Navajo and conducted most trade negotiations in Navajo. He was also typically a member of the local community.

Trading Post Patrons

- Fourth and fifth generation, as well as newer, artisans continue to come to Hubbell to trade and purchase items from the bullpen. Artisans continue to produce traditional ceramics, basketry, and rugs. However, some newer designs and objects are reflected in the trading post inventory.
- There has been a loss of artisans and professional traders, owing to attrition, and younger artisans are fewer in number.

Stakeholder Interest

- **Trader/WNPA** — The trader and other WNPA staff have a business interest in operating a viable trading post business and visitor center sales areas.
- **Artisans** — Artisans value the trading post as a point of sales for their wares and as a connection to long-established social and economic traditions associated with the trading post.
- **Local Community Members** — Local residents appreciate the opportunity to purchase items from the bullpen and continue to value the trading post as a place to socialize and exchange information, although not at the same intensity as in the past.
- **NPS** — NPS staff members are responsible for historic site operations and have a vested interest in maintaining the historic site's purpose and significance.

- **Visitors/General Public** — Visitors enjoy coming to the national historic site to learn about the trading post, interact with community members, observe trade, and purchase high-quality Southwestern Indian arts and crafts.
- **Hubbell Descendents** — The descendents appreciate the fact that the trading post J. L. Hubbell established is still operating. They also enjoy adding to the historic site's information base and providing a living connection with the Hubbell family.
- **State and Local Governments/Community Services** — These entities have a common interest in partnering with NPS staff to provide protection and safety for communities, the historic site, and park visitors.
- **Other Traders** — Other traders have an interest in maintaining trade/information networks that support their operations as well as those of Hubbell Trading Post.
- **Friends Groups** — These groups have strong personal connections to the trading post and choose to express that connection by hosting fund-raising events and supporting historic site activities.
- **Ganado Chapter House/Navajo Nation** — Tribal government representatives value their gateway community relationship with the national historic site. They support the historic site and act as advisors. In return, the national historic site supports activities and events that are of interest to the local community (e.g., the annual rug auction).

Desired Conditions

(management within existing law and policy)

- The spirit of the relationship established by J. L. Hubbell continues to be perpetuated by the NPS and the trader through their interaction with

the community. This relationship is based on the traditional values of trust, respect, hospitality, and the concept of fair trade/fair price.

Strategies

(management within existing law and policy)

- Strengthen trust among the local communities, NPS, and WNPA through increased participation in community activities on the part of NPS and WNPA.

Relevant Laws and Regulations

(see appendix C for brief descriptions of laws and regulations)

- NPS Organic Act
- NPS *Management Policies 2006*
- American Indian Religious Freedom Act
- 36 CFRs
- Native American Indian Craft Acts
- Indian Arts and Craft Act (18USC Chapter 53 Indians)
- Federal Trade Commission Guideline
- IRS Code for Nonprofit Organization (501c3)
- Director's Order 32: Cooperating Associations

Existing Planning Guidance

(see appendix D for descriptions of existing guidance)

1993 HUTR NHS: An Administrative History

2005 Guideline for Preserving Traditional Trading Practices, Historic Furnishings and Character at Hubbell Trading Post

2005 Scope of Sales Statement, HUTR NHS (Park and Western National Parks Association)

2005 Task Force Report for the Operation of the Trading Post at Hubbell Trading Post National Historic Site (Park and Western National Parks Association)

2006 Hubbell Trading Post NHS, Draft Strategic Plan (7/25/06)

2007 Comprehensive Interpretive Plan

2007 Draft Exhibit Proposal

Needed Planning and Guidance / Data and Analysis Needs

- Cooperating Association Management Policies Review — The 2005 WNPA *Scope of Sales Statement* changed some of the trading post's business practices. Management policies should be reviewed as part of the larger plan/policy review described under Significance Statement 1.
- Ethnographic History — Hubbell Trading Post has a long tradition of being a crossroad for many different cultures. An ethnographic history of the peoples frequenting the trading post would enhance the historic site staffs' understanding of this rich and complex heritage.

Next Steps

Using the information contained in the foundation document, the NPS would implement recommended strategies for protecting the fundamental resources and values, including the following:

1. Prioritize needed plans and policy guidance
2. Prioritize data needed for plans and policy guidance
3. Develop strategies for data collection and plan preparation, including funding sources for acquiring data
4. Implement data collection
5. Complete plans

Appendix A: Enabling Legislation

Public Law 89-148

August 28, 1965
[H. R. 3320]

AN ACT

To authorize the establishment of the Hubbell Trading Post National Historic Site, in the State of Arizona, and for other purposes.

Hubbell Trading
Post National
Historic Site,
Ariz.
Establishment.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, for the purpose of establishing the Hubbell Trading Post National Historic Site, the Secretary of the Interior is authorized to purchase with donated funds or funds appropriated for the purpose, at a price to be agreed upon between the Secretary and the owner or owners, not to exceed the fair market value, the site and remaining structures of the Hubbell Trading Post at Ganado, Arizona, including the contents of cultural and historical value, together with such additional land and interests in land as in his discretion are needed to preserve and protect the post and its environs for the benefit and enjoyment of the public: *Provided,* That the total area so acquired shall not exceed one hundred and sixty acres: *Provided further,* That the amount of land retained for the purpose hereinbefore stated shall not be in excess of that amount of land reasonably required to carry out the purposes of this Act, and any excess land, together with water rights, shall be offered for sale to the Navajo Indian Tribe at a price per acre equal to the per-acre price paid for the total area, excluding structures and contents thereof.

Administration.

SEC. 2. Upon a determination by the Secretary of the Interior that sufficient land, structures, and other property have been acquired by the United States for the national historic site, as provided in section 1 of this Act, such property shall be established as the Hubbell Trading Post National Historic Site, and thereafter shall be administered by the Secretary of the Interior in accordance with the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended. An order of the Secretary, constituting notice of such establishment, shall be published in the Federal Register.

16 USC 1-4.
Publication in
Federal Register.

Appropriation.

SEC. 3. There are hereby authorized to be appropriated not more than \$952,000 for the acquisition of lands and interests in land and the contents of the Hubbell Trading Post which are of cultural and historical value and for development costs in connection with the national historic site as provided in this Act.

Approved August 28, 1965.

Appendix B: Legislative History

Congressional Record — House, January 21, 1965; June 30, 1965; July 12–13, 1965

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PUBLIC LAW 89-148—AUG. 28, 1965

[79 STAT.]

Repeal.
74 Stat. 461.

performed in line of official duty, but the mileage allowed for any such trip shall not exceed the round trip mileage by the nearest usual route between Washington, District of Columbia, and the Member's place of residence in the congressional district involved. The Committee on House Administration of the House of Representatives shall make such rules and regulations as may be necessary to carry out this section.

SEC. 4. The second paragraph of section 105(c) of the Legislative Branch Appropriation Act, 1961 (Public Law 86-628; 2 U.S.C. 43c), is hereby repealed.

Approved August 28, 1965.

Public Law 89-148

August 28, 1965
[H. R. 3320]

AN ACT

To authorize the establishment of the Hubbell Trading Post National Historic Site, in the State of Arizona, and for other purposes.

Hubbell Trading
Post National
Historic Site,
Ariz.
Establishment.

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled, That, for the purpose of establishing the Hubbell Trading Post National Historic Site, the Secretary of the Interior is authorized to purchase with donated funds or funds appropriated for the purpose, at a price to be agreed upon between the Secretary and the owner or owners, not to exceed the fair market value, the site and remaining structures of the Hubbell Trading Post at Ganado, Arizona, including the contents of cultural and historical value, together with such additional land and interests in land as in his discretion are needed to preserve and protect the post and its environs for the benefit and enjoyment of the public: *Provided*, That the total area so acquired shall not exceed one hundred and sixty acres; *Provided further*, That the amount of land retained for the purpose hereinbefore stated shall not be in excess of that amount of land reasonably required to carry out the purposes of this Act, and any excess land, together with water rights, shall be offered for sale to the Navajo Indian Tribe at a price per acre equal to the per-acre price paid for the total area, excluding structures and contents thereof.

Administration.

SEC. 2. Upon a determination by the Secretary of the Interior that sufficient land, structures, and other property have been acquired by the United States for the national historic site, as provided in section 1 of this Act, such property shall be established as the Hubbell Trading Post National Historic Site, and thereafter shall be administered by the Secretary of the Interior in accordance with the provisions of the Act of August 25, 1916 (39 Stat. 535), as amended. An order of the Secretary, constituting notice of such establishment, shall be published in the Federal Register.

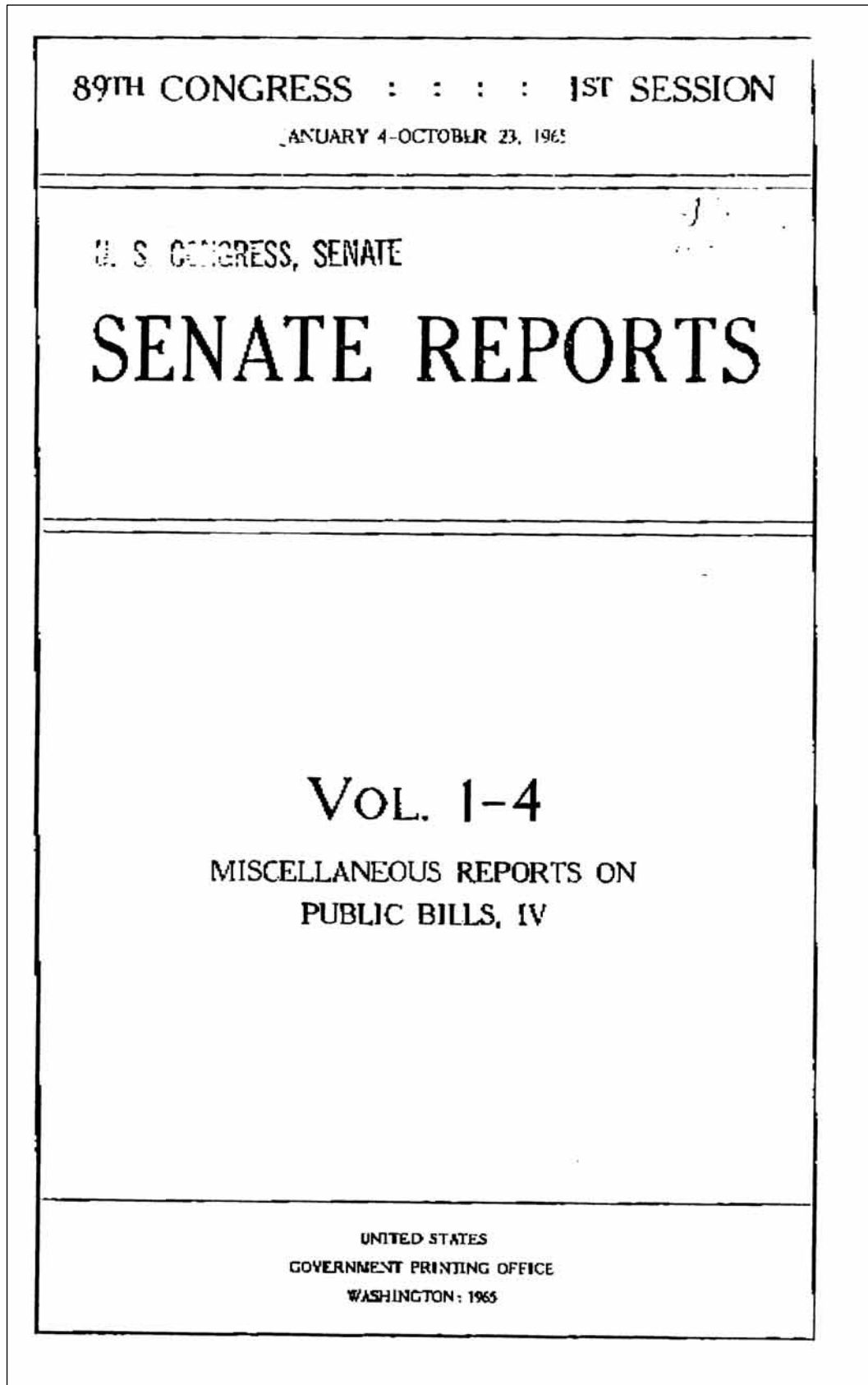
16 USC 1-4.
Publication in
Federal Register.

Appropriation.

SEC. 3. There are hereby authorized to be appropriated not more than \$952,000 for the acquisition of lands and interests in land and the contents of the Hubbell Trading Post which are of cultural and historical value and for development costs in connection with the national historic site as provided in this Act.

Approved August 28, 1965.

Senate Reports, Volumes 1-4, Miscellaneous Reports on Public Bills, IV 1965



Calendar No. 563

89th Congress }
1st Session }

SENATE

{
REPORT
No. 580

AUTHORIZING THE ESTABLISHMENT OF THE HUBBELL TRADING POST NATIONAL HISTORIC SITE, ARIZ.

August 12, 1965.—Ordered to be printed

Mr. HAYDEN, from the Committee on Interior and Insular Affairs,
submitted the following

REPORT

[To accompany H. R. 3320]

The Committee on Interior and Insular Affairs, to whom was referred the bill (H. R. 3320) to authorize the establishment of the Hubbell Trading Post National Historic Site, in the State of Arizona, and for other purposes, having considered the same, report favorably thereon without amendment and recommend that the bill do pass.

The purpose of H. R. 3320, a companion measure to S. 1337, introduced by Senators Hayden and Fannin of Arizona, is to authorize the acquisition of the Hubbell Trading Post, Arizona, including its valuable collection of Indian art and ethnological materials, and to provide for its administration by the Secretary of the Interior as a national historic site. A companion bill, H. R. 4901, was introduced by Congressman Sanner and considered by the committee at the same time as H. R. 3320.

NEED

The Hubbell Trading Post is in northeastern Arizona on the Navajo Indian Reservation. It has been classified by the Advisory Board of National Parks, Historic Sites, Buildings, and Monuments as being of exceptional value to commemorate and illustrate an important phase in the history of the United States.

Federal control of trade with the Indian dates back to the earliest days of the Republic (act of July 22, 1790, 1 Stat. 137). It was recognized from the beginning that the trader would be of great importance, for good or ill, in determining the relations between the Nation and its Indian neighbors and wards. In such isolated spots as northeastern Arizona was where John Lorenzo Hubbell, familiarly known as Don Lorenzo, founded his trading post; the institution was inescapably a strong influence. In his case, this influence was particularly strong, for he was recognized by the Navajos as well as

the Hopis, among whom he had lived earlier, as being earnestly interested in their welfare.

Don Lorenzo started his trading business at Rio Pueblo, Colo., now Canabó, in 1878 or earlier. His was the first trading post operated away from direct military protection. He himself continued the business until 1930 when he died. Thereafter the post was kept intact by his son who operated the business until his death not many years ago. The present trading post structure - a "long, low stone building, neither beautiful nor impressive" but representative of a past era and located in an area in which Indian, Spanish, and American influences were and are inextricably intertwined - was constructed about the turn of the century, replacing a smaller structure which was built when the business was founded. It and its furniture and furnishings have been kept intact. This means that the Nation now has an opportunity to acquire what is, in effect, an on-site museum of an era that, with the coming of roads and "civilization," has disappeared nearly everywhere. As the situation is summarized in the volume of the "National Survey of Historic Sites and Buildings" on military and Indian affairs, 1930-98:

The significance of the Hubbell Trading Post lies * * * in its preservation today of the trading post of yesterday. There have been few changes since the present post and house were built about 1900 to replace an earlier, smaller structure. The long stone trading post, with its ware room, storeroom, office, and blanket room, looks much as it did in Don Lorenzo's time, and much as other Navajo posts looked. The original massive counters still dominate the storeroom. Office furniture is that of half a century ago. Ancient linears, Indian craftwork, paintings, and rugs adorn the rug room. The rambling adobe hacienda in which Hubbell lived and entertained retains all of its old charm and atmosphere. The walls of the long living room and the bedrooms are covered with artwork, photographs, and Indian artifacts. Shelves laden with books line the walls. Navajo rugs lie everywhere. The old home conveys more vividly than words the manner in which the Hubbells and other early traders lived. The barn and utility buildings, mostly of stone, round out the complete picture of the old-time trading post. At the Hubbell Trading Post, the visitor at once understands and appreciates the pattern of the Navajo trade, the type of man who conducted it, and the kind of life he led.

For these reasons, it is the opinion of the Committee on Interior and Insular Affairs that the Hubbell Trading Post will be a valuable addition to the National Park System, particularly if arrangements can be worked out to have it operated along lines close to those that were in effect when it was an active post.

H.R. 3320 calls for the acquisition, at not more than fair market value, of 160 acres of land plus the buildings, nine in all, that are on it. The 160 acres, it is believed, will be sufficient to protect the setting of the trading post against unsightly incursions. If this is more land than is needed for the purposes of the bill, the Navajo Indian Tribe will be given an opportunity to purchase the excess at the price for which it was acquired and the proceeds of the sale will be deposited

HUBBELL TRADING POST HISTORIC SITE, ARIZ.

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in the general fund of the Treasury. It may also be that it will be possible for the tribe and the National Park Service to work out an exchange in which certain land within the area to be acquired will be traded for a small tract on its fringe which is in tribal ownership and which, it is believed, will be of value to the national historic site.

COST

The estimated cost of acquiring the Hubbell Trading Post and the land and buildings related to it is \$169,000. The collection of art, ethnological objects, and miscellaneous other movables has been valued by experts in the field at about \$143,500. Development costs will, it is believed, be about \$635,000. Section 3 of the bill, as amended, contains language appropriate to limit the amount authorized to be appropriated accordingly. Annual operating costs, at present price and wage levels, will be about \$70,000.

The land and water conservation fund will be available for appropriations for land acquisition in connection with the Hubbell Trading Post National Historic Site and the site will be subject to the provisions of the Land and Water Conservation Fund Act providing for the charging of admission fees.

DEPARTMENTAL RECOMMENDATION

The favorable report of the Department of the Interior recommending enactment of this legislation is set forth below:

U.S. DEPARTMENT OF THE INTERIOR,
OFFICE OF THE SECRETARY,
Washington, D.C., June 18, 1957.

HON. WAYNE N. ASPINALL,
*Chairman, Committee on Interior and Insular Affairs,
House of Representatives, Washington, D.C.*

DEAR MR. ASPINALL: Your committee has requested a report on H.R. 3520, a bill to authorize the establishment of the Hubbell Trading Post National Historic Site, in the State of Arizona, and for other purposes. H.R. 4901, an identical bill, is also pending before your committee.

We recommend that the bill be enacted, if amended as suggested in this report.

The bill authorizes the Secretary of the Interior to purchase with donated or appropriated funds, at a price that does not exceed the fair market value, the site and remaining structures of the Hubbell Trading Post at Ganado, Ariz., and its contents of cultural and historical value, together with additional lands and interests in lands needed to preserve and protect the post. The bill limits land acquisition for the establishment of the post to 160 acres.

The Hubbell Trading Post illustrates in an exceptional way a nationally important phase of the history of the United States - the part played by reservation traders in settling the West and in helping the American Indian understand the white man's way of life.

The Advisory Board on National Parks, Historic Sites, Buildings, and Monuments has classified the Hubbell Trading Post as having exceptional value in commemorating and illustrating the history of

4 HUBBELL TRADING POST HISTORIC SITE, ABZ.

the United States. The Board further recommended that it be acquired for inclusion in the national park system.

The Hubbell Trading Post is located on a 160-acre tract homesteaded by J. L. Hubbell. It is surrounded by Navajo Indian Reservation lands, and is included within the Ganado Indian irrigation unit of the Navajo Reservation. The existing post was built some 60 years ago, and the site was occupied for trading purposes approximately 80 years ago. An important aspect of the Hubbell Trading Post lies in the fact that the pattern of trade has persisted, with few changes, until very recent years, thus preserving an institution and way of life that disappeared elsewhere many years ago.

The post includes in its present makeup many intangible elements of living and association with important parts of the American heritage. The Spanish element, the American element, and the American Indian element are all well represented. In addition, the examples of western art preserved at the post are significant Americana and part of the story of trading post life. This post expresses a period in history as does no other known existing trading post, and its function as an agent for the diffusing of various cultural traits, begun in 1876, continues to this day among the Navajo and Hopi Indians.

In February 1958, the National Park Service made an area investigation report on the J. L. Hubbell Trading Post to determine its suitability and feasibility for park purposes, land and boundary requirements for administration, land ownership data, and land acquisition data. Exact property lines were not checked by this investigation, but it was estimated that 156 acres of land are now owned by the heirs of Roman Hubbell, which tract would be thus acquired for the site.

The Navajo tribal officials have informed us that they will support legislation for the establishment of the Hubbell Trading Post as a national historic site, provided the tribe may acquire any excess tillable land and water rights. The bill provides for retaining only that acreage of land reasonably required for carrying out the purposes of the act. We, therefore, recommend the bill be amended to give the Navajo Tribe the first opportunity to purchase any excess land, by changing the period on page 2, line 8, to a comma and adding "and any excess land, together with water rights, shall first be offered for sale to the Navajo Indian Tribe at a price per acre equal to the per acre price paid for the total area, excluding structures and contents thereof. Any excess land not sold to the Navajo Tribe shall be disposed of in accordance with the provisions of the Federal Property and Administrative Services Act of 1949, as amended."

We estimate that the cost of acquiring the land and improvements will be about \$169,000. We recommend, therefore, that on page 2, line 22, the figure "\$ 25,000" be changed to "\$169,000". The cost of acquiring the collection of art and ethnological objects at the post will approximate \$135,000. The guns, furnishings, books, and other objects having cultural or historical association with the site have an estimated value of \$8,464.

In addition to the acquisition of property, it is estimated that \$635,000 will be needed for total development of the site, which is programmed over a 5-year period. Annual operating costs will be about \$70,000 during the first 5 years after the national historic site is established.

HUBBELL TRADING POST HISTORIC SITE, ARIZ.

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The Bureau of the Budget has advised that there is no objection to the presentation of this report from the standpoint of the administration's program.

Sincerely yours,

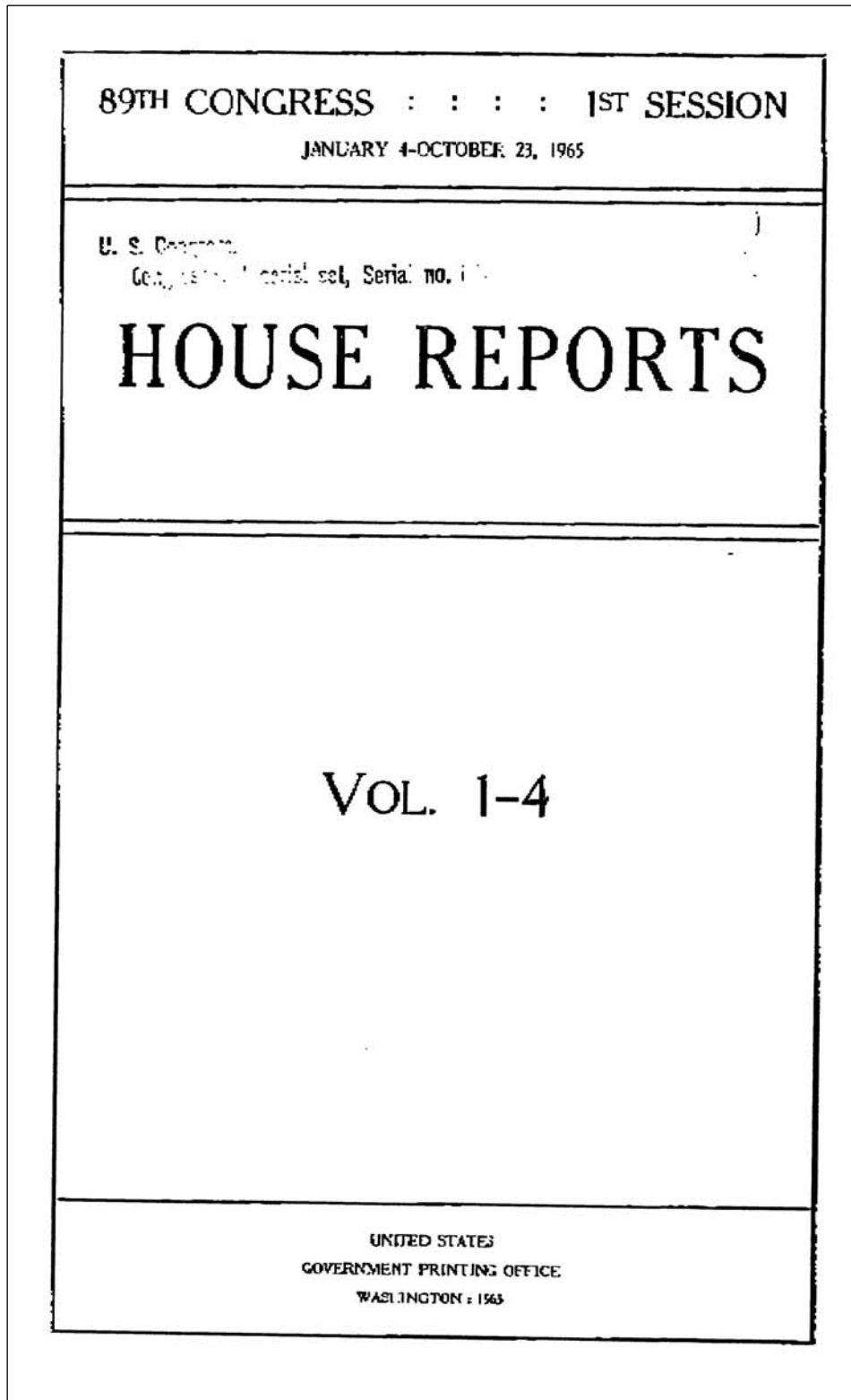
STANLEY A. CAHN,
Assistant Secretary of the Interior.

COMMITTEE RECOMMENDATION

The Committee on Interior and Insular Affairs recommends enactment of H.R. 3320.

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House Reports, Volumes 1-4, Miscellaneous Reports on Public Bills, IV 1965



and a majority of the principal officers of the executive departments, or such other body as the Congress might by law provide, transmit within 7 days to the designated officers of the Congress their written declaration that the President is unable to discharge the powers and duties of his office. Thereupon, the Congress would immediately proceed to decide the issue. It further provided that if the Congress determines by two-thirds vote of both Houses that the President is unable to discharge the powers and duties of his office, the Vice President would continue to discharge the same as Acting President; otherwise, the President would resume the powers and duties of his office.

The House version combined sections 4 and 5 into one section, now section 4. Under the House version, the Vice President had 2 days in which to decide whether or not to send a letter stating that he and a majority of the officers of the executive departments, or such other body as Congress may by law provide, that the President is unable to discharge the powers and duties of his office. The conference report provides that the period of time for the transmittal of the letter must be within 4 days.

The Senate provision did not provide for the convening of the Congress to decide this issue if it was not in session; the House provided that the Congress must convene for this specific purpose of deciding the issue within 48 hours after the receipt of the written declaration that the President is still disabled. The conference report adopts the language of the House.

The Senate provision placed no time limitation on the Congress for determining whether or not the President was still disabled. The House version provided that determination by the Congress must be made within 10 days after the receipt of the written declaration of the Vice President and a majority of the principal officers of the executive departments, or such other body as Congress may by law provide. The conference report adopts the principle of limiting the period of time within which the Congress must determine the issue, and while the House original version was 10 days and the Senate version an unlimited period of time, the report requires a final determination within 21 days. The 21-day period, if the Congress is in session, runs from the date of receipt of the letter. It further provides that if the Congress is not in session the 21-day period runs from the time that the Congress convenes.

A vote of less than two-thirds by either House would immediately authorize the President to assume the powers and duties of his office.

EMANUEL CELLER,
BYRON C. ROGERS,
JAMES C. CORMAN,
WILLIAM M. MCCULLOUGH,
RICHARD H. POFF,
Managers on the Part of the House.

○

87TH CONGRESS } HOUSE OF REPRESENTATIVES { REPORT
1st Session } No. 566

**AUTHORIZING THE ESTABLISHMENT OF THE HUBBELL
TRADING POST NATIONAL HISTORIC SITE, ARIZ.**

JUNE 30, 1965.— Committed to the Committee of the Whole House on the State
of the Union and ordered to be printed

Mr. UDALL, from the Committee on Interior and Insular Affairs, sub-
mitted the following

REPORT

[To accompany H. R. 3320]

The Committee on Interior and Insular Affairs, to whom was referred the bill (H. R. 3320) to authorize the establishment of the Hubbell Trading Post National Historic Site, in the State of Arizona, and for other purposes, having considered the same, report favorably thereon with amendments and recommend that the bill do pass.

The amendments are as follows:

Page 2, line 8, change the period to a comma and add:

and any excess land, together with water rights, shall be offered for sale to the Navajo Indian Tribe at a price per acre equal to the per acre price paid for the total area, excluding structures and contents thereof.

Page 2, line 16, strike out "(35 Stat. 535)," and insert "(39 Stat. 535),".

Page 2, lines 20 through 23, strike out all of section 3 and insert:

SEC. 3. There are hereby authorized to be appropriated not more than \$952,000 for the acquisition of lands and interests in land and the contents of the Hubbell Trading Post which are of cultural and historical value and for development costs in connection with the national historic site as provided in this Act.

PURPOSE

The purpose of H. R. 3320, by Congressman Udall, is to authorize the acquisition of the Hubbell Trading Post, Arizona, including its valuable collection of Indian art and ethnological materials, and to provide for its administration by the Secretary of the Interior as a

national historic site. A companion bill, H.R. 4901, was introduced by Congressman Sauer and considered by the committee at the same time as H.R. 3320.

MEMO

The Hubbell Trading Post is in northeastern Arizona on the Navajo Indian Reservation. It has been classified by the Advisory Board of National Parks, Historic Sites, Buildings, and Monuments as being of exceptional value to commemorate and illustrate an important phase in the history of the United States.

Federal control of trade with the Indians dates back to the earliest days of the Republic (act of July 22, 1790, 1 Stat. 137). It was recognized from the beginning that the trader would be of great importance, for good or ill, in determining the relations between the Nation and its Indian neighbors and wards. In such isolated spots as northeastern Arizona was where John Lorenzo Hubbell, familiarly known as Don Lorenzo, founded his trading post; the institution was inescapably a strong influence. In his case, this influence was particularly strong, for he was recognized by the Navajos as well as the Hopis, among whom he had lived earlier, as being earnestly interested in their welfare.

Don Lorenzo started his trading business at Rio Pueblo, Colo., now Canado, in 1878 or earlier. This was the first trading post operated away from direct military protection. He himself continued the business until 1930 when he died. Thereafter the post was kept intact by his son who operated the business until his death not many years ago. The present trading post structure—a "long, low stone building, neither beautiful nor impressive" but representative of a past era and located in an area in which Indian, Spanish, and American influences were and are inextricably intertwined—was constructed about the turn of the century, replacing a smaller structure which was built when the business was founded. It and its furniture and furnishings have been kept intact. This means that the Nation now has an opportunity to acquire what is, in effect, an on-site museum of an era that, with the coming of roads and "civilization," has disappeared nearly everywhere. As the situation is summarized in the volume of the "National Survey of Historic Sites and Buildings" on military and Indian affairs, 1830-98:

The significance of the Hubbell Trading Post lies * * * in its preservation today of the trading post of yesterday. There have been few changes since the present post and house were built about 1900 to replace an earlier, smaller structure. The long stone trading post, with its warerom, storeroom, office, and blanket room, looks much as it did in Don Lorenzo's time, and much as other Navajo posts looked. The original massive counters still dominate the storeroom. Office furniture is that of half a century ago. Ancient firearms, Indian craftwork, paintings, and rugs adorn the rug room. The rambling adobe hacienda in which Hubbell lived and entertained retains all of its old charm and atmosphere. The walls of the long living room and the bedrooms are covered with artwork, photographs, and Indian artifacts. Shelves laden with books line the walls. Navajo rugs lie everywhere. The old home conveys more

HUBBELL TRADING POST HISTORIC SITE, ARIZ.

3

vidly than words the manner in which the Hubbells and other early traders lived. The barn and utility buildings, mostly of stone, round out the complete picture of the old-time trading post. At the Hubbell Trading Post, the visitor at once understands and appreciates the pattern of the Navajo trade, the type of man who conducted it, and the kind of life he led.

For these reasons, it is the opinion of the Committee on Interior and Insular Affairs that the Hubbell Trading Post will be a valuable addition to the National Park System, particularly if arrangements can be worked out to have it operated along lines close to those that were in effect when it was an active post.

H.R. 3320 calls for the acquisition, at not more than fair market value, of 160 acres of land plus the buildings, nine in all, that are on it. The 160 acres, it is believed, will be sufficient to protect the setting of the trading post against unsightly intrusions. If this is more land than is needed for the purposes of the bill, the Navajo Indian Tribe will be given an opportunity to purchase the excess at the price for which it was acquired and the proceeds of the sale will be deposited in the general fund of the Treasury. It may also be that it will be possible for the tribe and the National Park Service to work out an exchange in which certain land within the area to be acquired will be traded for a small tract on its fringe which is in tribal ownership and which, it is believed, will be of value to the national historic site.

COMMITTEE AMENDMENT

The committee recommends three amendments to the bill. One corrects a typographical error. Another adds language dealing with possible sale of excess acreage to the Navajo Indian Tribe. The third limits the amount authorized to be appropriated not only for land acquisition but for various other purposes of the bill.

COST

The estimated cost of acquiring the Hubbell Trading Post and the land and buildings related to it is \$169,000. The collection of art, ethnological objects, and miscellaneous other movables has been valued by experts in the field at about \$143,500. Development costs will, it is believed, be about \$635,000. Section 3 of the bill, as amended, contains language appropriate to limit the amount authorized to be appropriated accordingly. Annual operating costs, at present price and wage levels, will be about \$70,000.

The land and water conservation fund will be available for appropriations for land acquisition in connection with the Hubbell Trading Post National Historic Site and the site will be subject to the provisions of the Land and Water Conservation Fund Act providing for the charging of admission fees.

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HUBBELL TRADING POST HISTORIC SITE ARIZ.

DEPARTMENTAL RECOMMENDATION

The favorable report of the Department of the Interior recommending enactment of this legislation is set forth below:

U.S. DEPARTMENT OF THE INTERIOR,
OFFICE OF THE SECRETARY,
Washington, D.C., June 18, 1967.

HON. WAYNE N. ASPINALL,
Chairman, Committee on Interior and Insular Affairs,
House of Representatives, Washington, D.C.

DEAR MR. ASPINALL: Your committee has requested a report on H.R. 3329, a bill to authorize the establishment of the Hubbell Trading Post National Historic Site, in the State of Arizona, and for other purposes. H.R. 4901, an identical bill, is also pending before your committee.

We recommend that the bill be enacted, if amended as suggested in this report.

The bill authorizes the Secretary of the Interior to purchase with donated or appropriated funds, at a price that does not exceed the fair-market value, the site and remaining structures of the Hubbell Trading Post at Ganado, Ariz., and its contents of cultural and historical value, together with additional lands and interests in lands needed to preserve and protect the post. The bill limits land acquisition for the establishment of the post to 450 acres.

The Hubbell Trading Post illustrates in an exceptional way a nationally important phase of the history of the United States—the part played by reservation traders in settling the West and in helping the American Indian understand the white man's way of life.

The Advisory Board on National Parks, Historic Sites, Buildings, and Monuments has classified the Hubbell Trading Post as having exceptional value in commemorating and illustrating the history of the United States. The Board further recommended that it be acquired for inclusion in the national park system.

The Hubbell Trading Post is located on a 160-acre tract homesteaded by J. L. Hubbell. It is surrounded by Navajo Indian Reservation lands, and is included within the Ganado Indian irrigation unit of the Navajo Reservation. The existing post was built some 60 years ago, and the site was occupied for trading purposes approximately 89 years ago. An important aspect of the Hubbell Trading Post lies in the fact that the pattern of trade has persisted, with few changes, until very recent years, thus preserving an institution and way of life that disappeared elsewhere many years ago.

The post includes in its present makeup many intangible elements of feeling and association with important parts of the American heritage. The Spanish element, the American element, and the American Indian element are all well represented. In addition, the examples of western art preserved at the post are significant Americana and part of the story of trading post life. This post expresses a period in history as does no other known existing trading post, and its function as an agent for the diffusing of various cultural traits, begun in 1876, continues to this day among the Navajo and Hopi Indians.

HUBBELL TRADING POST HISTORIC SITE, ARIZ.

5

In February 1958, the National Park Service made an area investigation report on the J. L. Hubbell Trading Post to determine its suitability and feasibility for park purposes, land and boundary requirements for administration, land ownership data, and land acquisition data. Exact property lines were not checked by this investigation, but it was estimated that 156 acres of land are now owned by the heirs of Roman Hubbell, which tract would be that acquired for the site.

The Navajo tribal officials have informed us that they will support legislation for the establishment of the Hubbell Trading Post as a national historic site, provided the tribe may acquire any excess tillable land and water rights. The bill provides for retaining only that acreage of land reasonably required for carrying out the purposes of the act. We, therefore, recommend the bill be amended to give the Navajo Tribe the first opportunity to purchase any excess land, by changing the period on page 2, line 8, to a comma and adding "and any excess land, together with water rights, shall first be offered for sale to the Navajo Indian Tribe at a price per acre equal to the per acre price paid for the total area, excluding structures and contents thereof. Any excess land not sold to the Navajo Tribe shall be disposed of in accordance with the provisions of the Federal Property and Administrative Services Act of 1949, as amended."

We estimate that the cost of acquiring the land and improvements will be about \$169,000. We recommend, therefore, that on page 2, line 22, the figure "\$125,000" be changed to "\$169,000". The cost of acquiring the collection of art and ethnological objects at the post will approximate \$135,000. The guns, furnishings, books, and other objects having cultural or historical association with the site have an estimated value of \$8,464.

In addition to the acquisition of property, it is estimated that \$635,000 will be needed for total development of the site, which is programmed over a 5-year period. Annual operating costs will be about \$70,000 during the first 5 years after the national historic site is established.

The Bureau of the Budget has advised that there is no objection to the presentation of this report from the standpoint of the administration's program.

Sincerely yours,

STANLEY A. CAIN,
Assistant Secretary of the Interior.

COMMITTEE RECOMMENDATION

The Committee on Interior and Insular Affairs recommends enactment of H.R. 3320, as amended.

○

Appendix C: Legislation and Policies Summary and Descriptions

Historic Preservation Legislation and Guidance

Legislation and Executive Orders:

- Antiquities Act of 1906 (P.L. 59-209, 34 Stat. 225): provided for protection of historic, prehistoric, and scientific features on federal lands, with penalties for unauthorized destruction or appropriation of antiquities; authorized the president to proclaim national monuments; authorized scientific investigation of antiquities on federal lands subject to permit and regulations.
- National Park Service Act of August 25, 1916 (P.L. 64-235, 39 Stat. 535): established the National Park Service; directed it to manage the parks "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."
- Historic Sites Act of 1935 (P.L. 74-292, 49 Stat. 666): declared "a national policy to preserve for public use historic sites, buildings, and objects . . ."; authorized the programs known as the Historic American Buildings Survey, the Historic American Engineering Record, and the National Historic Landmarks Survey; authorized the NPS to "restore, reconstruct, rehabilitate, preserve, and maintain historic or prehistoric sites, buildings, objects, and properties of national historical or archaeological significance and . . . establish and maintain museums in connection therewith"; authorized cooperative agreements with other parties to preserve and manage historic properties.
- Management of Museum Properties Act of 1955 (P.L. 84-127, 69 Stat. 242): authorized the NPS to accept donations or bequests of museum properties, purchase them from donated funds, exchange them, and receive and grant museum loans.
- Reservoir Salvage Act of 1960 (P.L. 86-523, 74 Stat. 220): provided for the recovery and preservation of "historical and archeological data (including relics and specimens)" that might be lost or destroyed in the construction of dams and reservoirs.
- Department of Transportation Act of 1966 (P.L. 89-670, 80 Stat. 931): stated in Sec 4(f) that the secretary of transportation "shall not approve any program or project which requires the use of any land from a public park, recreation area, . . . or historic site unless (1) there is no feasible and prudent alternative to the use of such land, and (2) such program includes all possible planning to minimize harm to such park, recreational area, . . . or historic site resulting from such use."
- National Historic Preservation Act of 1966 (P.L. 89-665, 80 Stat. 915; as amended by P.L. 91-243, P.L. 93-54, P.L. 94-422, P.L. 94-458, P.L. 96-199, P.L. 96-244, P.L. 96-515, P.L. 98-483, P.L. 99-514, P.L. 100-127, and P.L. 102-575): declared a national policy of historic preservation, including the encouragement of preservation on the state and private levels; authorized the secretary of the interior to expand and maintain a National Register of Historic Places including properties of state and local as well as national significance; authorized matching federal grants to the states and the National Trust for Historic Preservation for surveys and planning and for acquiring and developing National Register properties; established the Advisory Council on Historic Preservation; required federal agencies to consider the effects of their undertakings on National Register properties and provide the Advisory Council opportunities to comment (Section 106). Amended in 1976 (P.L. 94-422) to expand Section 106 to properties eligible for

as well as listed in the National Register. Amended in 1980 (P.L. 96-515) to incorporate E.O. 11593 requirements (see below), to give national historic landmarks extra protection in federal project planning, and to permit federal agencies to lease historic properties and apply the proceeds to any National Register properties under their administration. Amended in 1992 to, among other things, redefine federal undertakings, address "anticipatory demolition," and emphasize the interests and involvement of Native Americans and Native Hawaiians.

National Environmental Policy Act of 1969 (P.L. 91-190; 31 Stat. 852): declared a federal policy to "preserve important historic, cultural, and natural aspects of our national heritage"; required federal agencies to "utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences . . . in planning and in decisionmaking which may have an impact on man's environment."

Executive Order 11593, Protection and Enhancement of the Cultural Environment, May 13, 1971 (36 FR 8921): instructed all federal agencies to support the preservation of cultural properties; directed them to identify and nominate to the National Register cultural properties under their jurisdiction and to "exercise caution . . . to assure that any federally owned property that might qualify for nomination is not inadvertently transferred, sold, demolished, or substantially altered."

Archeological and Historic Preservation Act of 1974 (P.L. 93-291; 88 Stat. 174): amended the 1960 Reservoir Salvage Act; provided for the preservation of significant scientific, prehistoric, historic, and archeological materials and data that might be lost or destroyed as a result of federally sponsored projects; provided that up to one percent of project costs could be spent to recover, preserve, and protect archaeological and historical data.

General Authorities Act of 1976 (P.L. 94-458; 90 Stat. 1939): allowed the secretary of the interior "to withhold from disclosure to the public, information relating to the location of sites or objects listed on the National Register whenever he determines that the disclosure of specific information would create a risk of destruction or harm to such sites or objects."

Public Buildings Cooperative Use Act of 1976 (P.L. 94-541; 90 Stat. 2505): required the General Services Administration to acquire space for federal agencies in buildings of architectural or cultural significance where feasible; amended the Architectural Barriers Act of August 12, 1968, relating to the accessibility of certain buildings to the physically handicapped.

American Indian Religious Freedom Act of 1978 (P.L. 95-341; 92 Stat. 469): declared "the policy of the United States to protect and preserve for American Indians their inherent right of freedom to believe, express and exercise the traditional religions of the American Indian, Eskimo, Aleut, and Native Hawaiians, including, but not limited to access to sites, use and possession of sacred objects, and the freedom to worship through ceremonial and traditional rites."

Archaeological Resources Protection Act of 1979 (P.L. 96-95; 93 Stat. 712): defined archeological resources as any material remains of past human life or activities that are of archeological interest and at least 100 years old; required federal permits for their excavation or removal and set penalties for violators; provided for preservation and custody of excavated materials, records, and data; provided for confidentiality of archeological site locations; encouraged cooperation with other parties to improve protection of archeological resources. Amended in 1988 to require development of plans for surveying public lands for archeological resources and systems for reporting incidents of suspected violations.

Native American Graves Protection and Repatriation Act of 1990 (P.L. 101-601; 104 Stat. 3049): assigns ownership or control of Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony that are excavated or discovered on federal lands or tribal lands after passage of the act to lineal descendants or affiliated Indian tribes or Native

Hawaiian organizations; establishes criminal penalties for trafficking in human remains or cultural objects; requires federal agencies and museums that receive federal funding to inventory Native American human remains and associated funerary objects in their possession or control and identify their cultural and geographical affiliations within five years, and prepare summaries of information about Native American unassociated funerary objects, sacred objects, or objects of cultural patrimony. This is to provide for repatriation of such items when lineal descendants, Indian tribes, or Native Hawaiian organizations request it.

Indian Arts and Craft Act (18USC Chapter 53 Indians) Federal Trade Commission Guideline — The guideline includes stringent rules that made pawning unprofitable.

Executive Order 13007, Indian Sacred Sites, May 24, 1996 (61 FR 26771): instructs all federal land management agencies, to the extent practicable, permitted by law, and not clearly inconsistent with essential agency functions, to accommodate access to and ceremonial use of Indian sacred sites by Indian religious practitioners and to avoid adversely affecting the physical integrity of such sacred sites.

Management of Museum Properties Act (commonly known as the "Museum Act") 16 USC 18f-3, July 1, 1955, chapter 259, 69 Stat 242

Regulations:

36 CFR 18 (National Historic Preservation Act of 1966), "Leases and Exchanges of Historic Property," governs the historic property leasing and exchange provisions of this law.

36 CFR 60 (NHPA and EO 11593), "National Register of Historic Places," addresses concurrent state and federal nominations, nominations by federal agencies, revision of nominations, and removal of properties from the National Register.

36 CFR 63 (NHPA and EO 11593), "Determinations of Eligibility for inclusion in the National Register of Historic Places," establishes process for federal agencies to obtain determinations of eligibility on properties.

36 CFR 65 (Historic Sites Act of 1935), "National Historic Landmarks Program," establishes criteria and procedures for identifying properties of national significance, designating them as national historic landmarks, revising landmark boundaries, and removing landmark designations.

36 CFR 68 (NHPA) contains the secretary of the interior's standards for historic preservation projects, including acquisition, protection, stabilization, preservation, rehabilitation, restoration, and reconstruction.

36 CFR 79 (NHPA and ARPA), "Curation of Federally Owned and Administered Archeological Collections," provides standards, procedures, and guidelines to be followed by federal agencies in preserving and providing adequate long-term curatorial services for archeological collections of prehistoric and historic artifacts and associated records that are recovered under Section 110 of the NHPA, the Reservoir Salvage Act, ARPA, and the Antiquities Act.

36 CFR 800 (NHPA and EO 11593), "Protection of Historic and Cultural Properties," includes regulations of the Advisory Council on Historic Preservation to implement Section 106 of the National Historic Preservation Act as amended and presidential directives issued pursuant thereto.

43 CFR 3 (Antiquities Act) establishes procedures to be followed for permitting the excavation or collection of prehistoric and historic objects on federal lands.

43 CFR 7, Subparts A and B (Archaeological Resources Protection Act, as amended), "Protection of Archeological Resources, Uniform Regulations" and "Department of the Interior

Supplemental Regulations," provides definitions, standards, and procedures for federal land managers to protect archeological resources and provides further guidance for Interior bureaus on definitions, permitting procedures, and civil penalty hearings.

43 CFR 10 (NAGPRA) establishes a systematic process for determining the rights of lineal descendants, Indian tribes, and Native Hawaiian organizations to certain Native American human remains, funerary objects, sacred objects, and objects of cultural patrimony with which they are affiliated.

Historic Preservation Orders and Guidance:

Director's Order 24, "Standards for NPS Museum Collections Management," establishes mandatory standards for preserving, protecting, and documenting NPS museum collections.

Director's Order 26, "Projects Must Fund Basic Preservation of Museum Collections They Generate," provides guidance to ensure that projects that generate museum collections include sufficient funding for documentation and basic preservation of those collections.

Director's Order 27, "Historic Property Leases and Exchanges," elaborates on the leasing and exchange of historic properties under Section 111 of the National Historic Preservation Act of 1966 as amended.

Director's Order 28, "Cultural Resource Management and Cultural Resource Management Guidelines" — provides guidance on the identification, analysis, assessment, and preservation of archeological resources, historic structures, cultural landscapes, and other cultural resources.

Executive Order 13175, American Tribal Governments April 29, 1994, 59 FR 22951 [25 USC 450], Consultation and Coordination with Indian Tribal Governments, November 6, 2000, 65 FR 67249 [25 USC 450].

Staff Directive 96-1, "Linking Cultural and Natural Resource and Socio-economic Data to Park Planning and Management," provides guidance on the kinds and level of detail of information needed about park resources for planning and decision-making and identifies sources of that information.

Department of the Interior Interim Standards for Documentation, Preservation and Protection of Museum Property (September 1990). This document provides interim standards for documentation, preservation, and protection of Department of the Interior museum property and guidance for meeting those standards. The standards are to be applied at each unit that manages museum property.

Other Legislation

Americans with Disabilities Act of 1990 (ADA) 42 USC 12101–12213; P.L. 101-336

National Environmental Policy Act of 1969 (NEPA) 42 USC 4321–4370d; P.L. 91-190

National Park System General Authorities Act 16 USC 1a-1 et seq.12; P.L. 91-383, 94-458, 95-250 19jj-4; P.L. 101-337, 104-333 — Restitution for damages; proper claim procedures so the claim doesn't go to Treasury (common to all five statements).

Other Regulations

IRS Code for Nonprofit Organization (501c3) — Presents requirements for qualifying and remaining a nonprofit organization.

Parks, Forests, and Public Property 36 CFR.

Public Health 49 CFR 100-185 (Hazardous Materials) — provides directions and guidance on dealing with hazardous materials.

Truth in lending 15 U.S.C. 1601 (P.L. No. 90-321; 82 Stat. 146), effective May 29, 1968 — assures a meaningful disclosure of credit terms so that the consumer will be able to compare more readily the various credit terms available to him.

Other Orders and Guidance

Director's Order 6, Interpretation and Education, supplements Management Policies with operational policies and procedures necessary to maintain effective, high-quality interpretive and educational programs.

Director's Order 13B, Solid and Hazardous Waste Management.

Director's Order 32, Cooperating Associations, Reference Manual, NPS guidelines for establishing agreements and working with cooperating associations.

Director's Order 42, Accessibility for Park Visitors, guidance on providing the highest level of accessibility that is reasonable throughout the national park system.

Director's Order 50B, Occupational Safety and Health Program, establishes and implements a program that continuously improves a measurable risk management process for park service employees.

Director's Order 50C, Public Risk Management Program, establishes and implements a continuously improving and measurable process that minimizes the occurrence of visitor injury, illness and property loss and achieves maximum effectiveness in communicating risk to the public, without negative impacts to park resources.

Director's Order 53, Special Park Uses, sets forth the policies and procedures for administering special park uses on national park system lands.

Director's Order 58, Structure Fire Management, supplements the structural fire policy articulated in *National Park Service Management Policies* by setting forth the operational policies and procedures necessary to establish and implement structural fire management programs throughout the national park system.

Director's Order 71A, Government-to-Government Relationships with Tribal Governments.

Director's Order 77, Natural Resource Protection, NPS Reference Manual 77: Natural Resource Management.

Director's Order 77-2, Floodplain Management, specific guidance, provide leadership, and take action to reduce the risk of flood loss; minimize the impact of floods on human safety, health and welfare; and restore and preserve the natural and beneficial values served by floodplains.

Director's Order 77-3, Domestic and Feral Livestock Management (under development).

Director's Order 77-6, Cooperative Research and Development Agreements.

Director's Order 77-7, Integrated Pest Management.

Director's Order 83, Public Health.

Federal Trade Commission Guideline — The guideline includes stringent rules that made pawning unprofitable.

IRS Code for Nonprofit Organization (501c3) — Presents requirements for qualifying and remaining a nonprofit organization.

Appendix D: Summary and Descriptions of Hubbell National Historic Site Management Policies and Reports

Guidance and Policies

Year	Title	Description	Author	Sponsor
1965	<i>Public Law 89-148, 89th Congress HR 3320, August 28, 1965</i>	Enabling legislation for Hubbell Trading Post NHS.	US Congress	US Congress
1965	<i>Congressional Record - House, January 21, 1965, 999</i>	Describes congressional intent in establishing Hubbell Trading Post NHS	US Congress - House	US Congress - House
1965	<i>Congressional Record - House, June 30, 1965, 15313</i>	"	US Congress - House	US Congress - House
1965	<i>Congressional Record - House, July 12, 1965, 16329-16384</i>	"	US Congress - House	US Congress - House
1965	<i>Congressional Record - House, July 13, 1965, 16707</i>	"	US Congress - House	US Congress - House
1965	<i>Congressional Record - House, August 12, 1965, 20154</i>	"	US Congress - House	US Congress - House
1965	<i>Congressional Record - Senate, August 16, 1965, 20519-20520</i>	"	US Congress - Senate	US Congress - Senate
1965	<i>Congressional Record - Senate, August 17, 1965, 20606-20815</i>	"	US Congress - Senate	US Congress - Senate
1965	<i>Congressional Record - House, August 19, 1965, 21102</i>	"	US Congress - House	US Congress - House
1965	<i>House Reports, Vols. 1-4 January 4, - October 23, 1965</i>	"	US Congress - House	US Congress - House
1965	<i>House Reports, Vols. 1-4: Miscellaneous Reports on Public Bills, IV, January 4 - October 23, 1965</i>	"	US Congress - Senate	US Congress - Senate
1965	<i>Congressional Record - House, September 14, 1965, 23628</i>	"	US Congress - House	US Congress - House
1972	<i>Hubbell Trading Post National Historic Site Master Plan</i>	Guidance for site development and management.	Westley, Volney J. "Team Captain"	NPS

Year	Title	Description	Author	Sponsor
1979	<i>Assessment of Alternative for Development Concept Plan</i>	Identifies four development packages for public consideration.	Denver Service Center	NPS
1980	<i>Development Concept Plan</i>	Sets forth the development strategy for the park.	Denver Service Center	NPS
1980	<i>Interpretive Prospectus</i>	Further development of interpretive services at HUTR emphasizing personal services over non-personal.	Interdisciplinary NPS team	NPS
1981–1984	<i>Basic Operations, Southwest Region, Hubbell Trading Post NHS</i>	This is a Master Plan Light; it identifies park resources and how staff will manage them.	Gastellum, L. Ed Superintendent	NPS
1982	<i>Management Evaluation</i>	Evaluated the day-to-day operations of the National Park Service unit.	Switzer, Ronald R. Carlin, Edward D., and Dean, Frances	NPS
1984	<i>Preservation Plan, Corrals and Sheds HB 10, Hubbell Trading Post National Historic Site</i>	Provides for preserving and stabilizing the corrals and sheds at Hubbell Trading Post NHS.	Conservation Services	NPS
1984	<i>Historic Structure Preservation Guide, Part I, Preventive Maintenance System</i>	Provides for preserving and stabilizing historic structures in Hubbell Trading Post NHS.	Conservation Services	NPS
1984	<i>Historic Structure Preservation Guide, Part II, Reference Support Record Systems, Hubbell Trading Post National Historic Site</i>	Provides for preserving and stabilizing historic structures in Hubbell Trading Post NHS.	Conservation Services	NPS
1985	<i>Cooperating Association Agreement</i>	Guidelines for operating the trading post. Stipulates that operations will be based on historic traditions at Hubbell Trading Post, while allowing for a continuing evolution of its practices to ensure the perpetuation of an active trading post for interpretation to the public.	NPS/SWPA	NPS/SWPA
1986	<i>Statement for Management, Hubbell Trading Post National Historic Site</i>	Defines operation procedures for managing and operating the national historic site.	NPS	NPS
1990	<i>Scope of Collection Statement</i>	Identifies what objects should be included in the museum collection and how they should be managed.	NPS/Friends of Hubbell Trading Post NHS	NPS/Friends of Hubbell Trading Post NHS
1990	<i>Memorandum of Agreement between University of Arizona and Hubbell Trading Post NHS (Appendix C, Hubbell Trading Post NHS: An Administrative History, 1993.</i>	Defines terms for the long-term loan of Hubbell Archival material (e.g., business records)	Wyatt, Charles D., Heib, Louis, and McCrary, Patrick	NPS/UofA
1990	<i>Memorandum of Understanding between Hubbell Trading Post NHS and Friends of Hubbell Trading Post NHS (Appendix B Hubbell</i>	Defines how the friends groups will partner with the historic site on various events and fund-raising activities.	Wyatt, Charles D., Superintendent	Hubbell Trading Post National Historic Site

Year	Title	Description	Author	Sponsor
	<i>Trading Post NHS: An Administrative History, 1993)</i>			
1991	<i>Operations Evaluation: Cultural Resource Management</i>	Forty-six answered questions and 15 completed forms that determine how the CR program is operating.	Historic Site Staff	NPS
1992	<i>Scope of Collections Statement, Hubbell Trading Post National Historic Site</i>	Defines the types of objects to be included in the museum collection and basic collection management goals and objects.	Interdisciplinary NPS team	NPS
1997	<i>Long-Range Interpretive Plan, Hubbell Trading Post National Historic Site</i>	Establishes the nature and content of the national historic site's interpretive program.	NPS	NPS
2002	<i>2002-2005 Strategic Plan, Hubbell Trading Post National Historic Site</i>	Establishes the national historic site's 5-year, long-term GPRA management goals.	NPS	NPS
2002	<i>Cultural Landscape Inventory, Hubbell Trading Post Landscape</i>	Identifies and evaluates the significance of structures, buildings, and small-scale features found within the Hubbell's cultural landscape.	Galbraith, Julie, and Kowalski, Judy	NPS
2004	<i>National Historic Landmark Designation, Hubbell Trading Post National Historic Site</i>	Establish Hubbell Trading Post NHS as a national landmark. This was an administrative action that was not supported by documentation.	NPS	NPS
2005	<i>Guidelines for Preserving Traditional Trading Practices, Historic Furnishing, and Character at Hubbell Trading Post</i>	An overview of traditional trading practices, services, and values.	Landrum, Christine M. J.	NPS
2005	<i>Hubbell Trading Post National Historic Site (Wildland) Fire Management Plan</i>	Written to support the HUTR resource management goals: guide decision-making process, provide framework for fuels management, and plan and implement a wildland fire program across agency boundaries.	The Mesa Verde National Park FMO	NPS
2005	<i>Task Force Report for the Operation of the Trading Post at Hubbell Trading Post National Historic Site</i>	Recommends a historic furnishing report, a scope of sales statement, an operations plan (internal standard operating procedures).	Chattin, Wayne, and Dubois, Stephanie	WNPA/NPS
2005	<i>Scope of Sales Statement, Hubbell Trading Post National Historic Site</i>	Revised procedures for trading post operations to ensure greater accountability and financial accuracy.	Simpson, Le Ann, and Stone, Nancy	WNPA/NPS
2006	<i>Hubbell Trading Post NHS Draft Strategic Plan (7/25/06)</i>	Presents the historic site's long-term strategic goals, as required by GPRA.	NPS	NPS
2006	<i>Draft Scope of Collection Statement, Hubbell Trading Post National Historic Site</i>	Defines the types of objects to be included in the museum collection and basic collection management	NPS	NPS

Year	Title	Description	Author	Sponsor
		goals and objects.		
2006	<i>Hubbell Trading Post NHS, Draft Strategic Plan (7/25/06)</i>	Establishes the national historic site's 5-year, long-term GPRA management goals.	Stone, Nancy, Superintendent and Historic Site Staff	NPS
2006	<i>George Hartzog (e-mail 8/27/06)</i>	Describes Hartzog's vision for the national historic site.	Vaughn, Tom	Vaughn
2006	<i>Voices from the Past (e-mail 8/29/06)</i>	Presents personal view on the significance of Don Lorenzo Hubbell.	Vaughn, Tom	Vaughn
2007	<i>Long-Range Interpretive Plan, CIP Component 1, Hubbell Trading Post National Historic Site Comprehensive Interpretive Plan</i>	Further defines primary and secondary interpretive themes and how these themes will be interpreted on and offsite.	Worthington, Anne, Superintendent, and Historic Site Staff	NPS

Reports

Year	Title	Description	Author	Sponsor
1958	<i>Comments on the Hubbell Trading Post</i>	A suggestion that Hubbell Trading Post should be part of the national park system.	Steen, Charlie R.	NPS Regional Archeologist
1959	<i>Special Report on Hubbell Trading Post</i>	Assesses the historical significance of the Hubbell Trading Post in Ganado.	Utley, Robert M.	NPS
1959	<i>Evaluation of the Hubbell Trading Post, Washington Office, National Park Service</i>	Various views on the proposal to establish HUTR, from the Branch of History, WASO, NPS.	WASO	NPS
1963	<i>Brief Survey of Old Navajo Trading Posts, supplement to Special Report on the Hubbell Trading Post, January 1959</i>	A survey intended to reinforce the conclusion that the Hubbell Trading Post best portrays the trading post phase in American history.	Utley, Robert M.	NPS
1965	<i>89th Congress Background Book, Proposed Hubbell Trading Post National Historic Site</i>	A tabbed notebook compiling background information about the historic property for Secretary George B. Hartzog.	The secretary's staff	NPS
1966	<i>Historic Structure Inventories and Report</i>	Preliminary assessment of the trading post structures.	Utley, Robert M.	NPS
1966	<i>Part 1 Historic Structures Report, Hubbell Trading Post National Historic Site, Ganado, AZ.</i>	Presents initial structural documentation of the historic structures.	Cook, John E., and Brown, William E.	NPS
1966	<i>Historic Structures Report Part II (Barn)</i>	Provides additional documentation on the barn.	Levy and Pope	NPS

Year	Title	Description	Author	Sponsor
1967	<i>Report on Two-Story Barn HB-3, The J. L. Hubbell Trading Post</i>	Provides a preliminary structural assessment of the barn.	Gatham, Walter A.	NPS
1967	<i>Interpretive Prospectus for Hubbell Trading Post NHS</i>	Initial interpretive implementation plan.	Cook, John E., and Brown, William E.	NPS
1967	<i>Emergency Stabilization Work of Hubbell Barn</i>	A collection of memos and photographs identifying the need and scheduling the work to stabilize the northwest corner and wall of the Hubbell barn.	Thomas, Chester A., Kowski, Frank F., Voll, Charles B., Judd, Henry A., Miller, George W., and Watkins, E. W.	NPS
1967	<i>Fact Sheet: Hubbell Trading Post National Historic Site</i>	A Southwest Region Office memorandum that provides background information about the new site.	Wolfe, Wescoat S.	NPS
1968	<i>Hubbell Trading Post, Historic Structures Report Part II, Historical Data Section</i>	Provides historical documentation on Hubbell Trading Post.	Levy, Benjamin, and Pope, Charles	NPS
1968	<i>Hubbell Trading Post, Historic Structures Report Part II, Two-Story Barn</i>	A classic HSR reporting the size and history of the building and providing maintenance recommendations.	Levy, Benjamin, and Pope, Charles	NPS
1968	<i>Hubbell Trading Post Wareroom Furnishing Study</i>	Documents wareroom furnishings.	Levy, Benjamin	NPS
1969	<i>HB09 Stabilization Report</i>	Documents stabilization efforts.	Morris	NPS
1969	<i>Changes in the Building Complex at Hubbell Trading Post and Significance for the Development of the Area as a National Historic Site</i>	A preliminary evaluation of the available data.	Brugge, David M.	NPS
1970- Present	<i>Visitor Use Statistics</i>	A record of visitation to HUTR.	Division of Interpretation	NPS
1970	<i>Part II: Historic Structures Report for Trading Post, HB-1, Class AAA, Wareroom Extension HB-9, Class CC</i>	Supplementation documentation of structures.	Koue, A. Lewis, and Simmons, Robert V.	NPS
1970	<i>Part II: Historic Structures Report for Hubbell Home, Trading Post, Curatorial Storage, Bread Oven, etc.</i>	Supplementation documentation of structures.	Koue, A. Lewis, Simmons, Robert V., and Brugge, David M.	NPS
1971	<i>HB 1 Trading Post and HB 9 Wareroom Extension, Historic Structures Report Part II.</i>	Provides a preliminary structural assessment of the wareroom.	Koue, A. Lewis, and Simmonds, Robert V.	NPS

Year	Title	Description	Author	Sponsor
1970-1971	<i>Reconstruction of the North Wall on the Trading Post</i>	Documents reconstruction activities.	Voll, Charles B., and Brugge, David M.	NPS
1971	<i>Historic Structures Report Part II Bread Oven, HB-7, Class BBB</i>	This report proposes to reconstruct the oven in its final version and make it fully operational.	Koue, A. Lewis, and Simmonds, Robert V.	NPS
1971	<i>HB 2 The Hubbell Home Historic Structures Report Part II.</i>	Provides a preliminary structural assessment of the Hubbell Home.	Koue, A Lewis and Robert V. Simmonds	NPS
1972	<i>Former Fireplaces in HB-1 and HB-2</i>	This memo to Robert Simmonds (DSC) identifies ceiling holes in HB01 and HB02 where fireplace smokestacks formerly penetrated.	Brugge, David M.	NPS
1972	<i>Furnishing Study, HB 2 The Hubbell Home</i>	Provides a preliminary structural assessment of the documents and provides guidance on furnishing the Hubbell Home.	Historic Preservation Team - DSC	NPS
1972	<i>The Valley of the Red House</i>	Unpublished manuscript of the history of the Ganado Valley.	Brugge, David M.	NPS
1973	<i>Pollen Studies at Wide Reed Ruin</i>	An unedited analysis of 60 sediment samples from Wide Reed Ruin. This study is published as an appendix in the <i>Wide Reed Ruin Report</i> by James E. Mount (1993).	Schoenwetter, James	ASU
1973	<i>Hubbell Home Furnishing/Study</i>	Documents Hubbell home furnishings.	Brugge, David M.	NPS
1973	<i>Hubbell Trading National Historic Site Archeology Project - Grade Testing</i>	Results of archeological test excavations May 14-June 22, 1973	Gates, Gerald R.	NPS
1973	<i>Final Report - Faunal Analysis of Material Collected at Hubbell Trading Post During May and June 1973</i>	Analysis of bones recovered from the NHS.	Bayham, Frank E.	U of A
1974	<i>Changes in the Building Complex at HUTR and Significance for Development of the Area as a National Historic Site</i>	An unpublished, typed, preliminary report for most of the historic structures at HUTR.	Brugge, David M.	NPS
1975	<i>Hubbell Trading Post NHS Collection Management Plan</i>	Documents a strategy for preserving and caring for objects in the museum collection.	Division of Museum Services Harpers Ferry Center	NPS
1975	<i>Faunal Analysis Butchering Pits - Hubbell Trading Post</i>	Locates historic grades or levels of occupation since the construction of the trading post.	Olsen, Stanley J. and Breezley, John	ASM for the Arizona Archeological Center of the NPS

Year	Title	Description	Author	Sponsor
1975	<i>Final Report - Faunal Analysis of Material Collected at the Hubbell Trading Post in 1973</i>	Presents a faunal analysis for the nonspecialist, interprets the material, and evaluates previous hypotheses.	Bayham, Frank E.	ASM for the Arizona Archeological Center of the NPS
1976	<i>Report of Ethnographic Conservation Services to Hubbell Trading Post National Historic Site</i>	Contractor identified the current condition of the textiles, pottery, basketry, and beaded artifacts. Then performed first-aid conservation.	Valentour, Catharine	NPS
1977	<i>Salvage Archeology of Site 10</i>	Results from salvage archeological testing.	Brugge, David	NPS
1978	<i>Review of Planning Documents</i>	A narrative identifying inconsistencies in planning documents for treatment and use of HUTR historic properties.	Scott, Jane E.	NPS
1978	<i>Soil Survey and Interpretations</i>	Detailed soil survey of 150 acres; descriptions of soils, interpretations, and management recommendations.	Earth Environmental Consultants, Inc.	NPS
1978	<i>Archeological Excavations at 11 Prehistoric Sites within the Ganado Sewer Lagoon and Along the Right-of-Way of Route N27.</i>	Report with analysis of archeological discoveries in the 11 sites.	Fuller, Steven L.	NPS
1979	<i>Archeological Assessment</i>	Summary of area Navajo and Pueblo ethnohistory and Anglo-American history emphasizing Hubbell's life and trading post.	Scurlock, Dan	NPS
1979	<i>Dendrochronology of Hubbell Trading Post and Residence</i>	Tree ring core samples were pulled from vigas in HB01 and HB02 to date the structures.	Robinson, William J.	NPS
1979	<i>HB 3 Barn and Blacksmith Shop, Historic Furnishing Study</i>	Provides a preliminary structural assessment of the documents and provides guidance on furnishing the barn and blacksmith shop.	Clemensen, A Berle	NPS
1979	<i>Hubbell Trading Post National Historic Site</i>	Historical documentation on the National Historic Site.	Scurlock, Dan	NPS
1980	<i>Fire Suppression System Design Analysis. Historic Structure Report</i>	Describe methods to be used in protecting the historic structures from fire-related damage.	Gould, Jeff, and Siroky, Les	NPS
1981	<i>Conservation Survey of the Basketry Collection at Hubbell Trading Post</i>	570 baskets were examined; condition was noted and conservation needs prescribed.	Raphael, Bettina	For the NPS

Year	Title	Description	Author	Sponsor
1981	<i>Sand Dune Site</i>	Salvage excavations of threatened site features.	Adams, Steve	NPS
1983	<i>Test Excavations of the Sand Dune Site</i>	Tests were conducted to determine the southern boundary of the site.	Bradford, Jim	NPS
1983	<i>Farm Equipment Preservation (memo and field notes)</i>	A summary of treatment proposals and probable costs for HUTR farm equipment.	Bauer, Liz	NPS
1983	<i>Leonard Building Site</i>	Archeological testing at the site of the original Leonard trading post.	Bradford, Jim	NPS
1983	<i>Soil Erosion Study</i>	Analysis of current erosion conditions with recommendations for effective control measures of the Pueblo Colorado Wash and tributaries.	Euge, Kenneth	NPS
1983	<i>Farmlands History: Part One — Water Crops</i>	Historical study of water and the development of irrigation at HUTR for the crops raised there.	Peterson, Charles S.	WNPA for NPS
1984	<i>Corrals & Sheds HB-10 Preservation Plan: Hubbell Trading Post NHS</i>	A loose-leaf notebook with photographs, drawings, and text.	Friedman, Renee, of Conservation Services	NPS
1984	<i>Historic Structure Preservation Guide Hubbell Trading Post NHS Part I: Preventive Maintenance System</i>	A field handbook for the maintenance management of the following historic structures: HB-1 through HB-14	Conservation Services	NPS
1984	<i>Historic Structure Preservation Guide Hubbell Trading Post NHS Part II: Reference Support Record System</i>	A field handbook for the maintenance management of the following historic structures: HB-1 through HB-14	Conservation Services	NPS
1986	<i>Homestead and Farm: A History of Farming at the Hubbell Trading Post National Historic Site</i>	The study traces and describes the means by which J. L. Hubbell's occupation of the farm evolved from business interest to land claim, and from land claim to water right.	Peterson, Charles S.	WNPA for NPS
1987	<i>Historic Analysis at HUTR</i>	Summarizes the analysis of historic artifacts recovered from test excavations between 1982 and 1987 from HB01, HB02, a drain between HB01-HB02, and the stabilization of the compound wall HB38.	Habicht-Mauche, Judith, and Stiner, Mary	NPS
1987	<i>Excavation of the Sand Dune Site (AZ.K:6:11) at Hubbell Trading Post National Historic Site</i>	Salvage archeology of the severely eroded Sand Dune Site.	Southwest Archaeological Consultants, Inc. Jones, Karin L.	NPS
1987	<i>A Checklist of the Vascular Plants of Hubbell Trading Post National Historic Site</i>	A checklist with 130 species and varieties listed.	Ghandi, Kancheepuram, and Hatch, Stephan L.	Texas A&M University

Year	Title	Description	Author	Sponsor
1985-1987	<i>Salvage archeological excavations of the Sand Dune Site at Hubbell Trading Post NHS</i>	Excavation exposed nine features.	Bradford, Jim	NPS
1988	<i>ADMINISTRATIVE RECORDS 1912-1967 ARG 8 for the Hubbell Trading Post Catalog Number HUTR 17733</i>	210,000 archival records from the Hubbell family business operations.	The Hubbell Business Employees	HUTR Museum Property
1990	<i>Furnishing Plan - Kitchen and Cook's Room</i>	Consolidation and analysis of oral interviews, inventories, and photographs of the kitchen and cook's room furnishings in HB02.	Chamberlin, Ed	NPS
1990	<i>Artifact Report - Wareroom Subfloor (Draft)</i>	Archeological report for the excavation and collection of artifacts from the wareroom subfloor.	McKenna, Peter	NPS
1991	<i>Paper Conservation Survey at Hubbell Trading Post National Historic Site</i>	23 cataloged items were examined. A description of work was prescribed with the cost to perform the work.	Glazer, Mary Todd	For the NPS
1991	<i>Documentation and Analysis of Materials Recovered from the Wareroom Subfloor, Hubbell Trading Post</i>	A study of the artifacts collected during the 1990 wareroom floor replacement to arrive at interpretations of economic and social activities in the wareroom.	Bearden, Susan E., and Anderson, Joseph K.	NPS
1992 & 1994	<i>The Brugge Collection, 1974-1989</i>	An archive of archeological and historical reference files for Hubbell Trading Post NHS and Chaco Culture National Historical Park	Brugge, David M.	NPS
1993	<i>An Archaeological Survey of Ganado Dam, Navajo Reservation, Arizona - A Class III Cultural Resources Survey and Evaluation 93-16</i>	Field surface survey for archeological remains around the Ganado Dam area for the rehabilitation of the Ganado Irrigation canal project.	Statistical Research, Inc.	Bureau of Reclamation
1993	<i>Wide Reed Ruin</i>	Report of the excavation of the archeological site named Wide Reed Ruin.	Mount, James E., Teague, George A., Olsen, Stanley J., Olsen, John W., Treadwell, B. Dean, Brugge, David M., and Schoenwetter, James	NPS
1993	<i>Hubbell Trading Post National Historic Site: An Administrative History</i>	Provides an extensive documentation on the establishment and management of the national historic site.	Manchester, Albert, and Manchester, Ann	NPS

Year	Title	Description	Author	Sponsor
1994	<i>Navajo Safety of Dams Project; Photographic Documentation of Ganado Dam, Apache County, Arizona</i>	A photographic mitigation effort to fulfill the needs of the NHPA prior to correcting safety deficiencies.	White, William G.	BOR for NNHPD
1995	<i>List of Classified Structures Hubbell Trading Post NHS</i>	A notebook with information forms completed and photographs of each structure.	Bunyak, Dawn	NPS
1997	<i>The Two-Story Barn, Historic Structure Report</i>	Provides information on the history and current conditions of the two-story barn, HB03.	Cloyd, Paul, Lowe, M. J., and Rosen, Julie	NPS
1997	<i>Long Range Interpretive Plan, Hubbell Trading Post NHS</i>	Provides recommendation for interpretive staffing, personal services, partnership, and proper signage and presents a plan for implementing those recommendations	Harpers Ferry Center and HUTR Park Staff	NPS
1998	<i>Cultural Landscape Report for Hubbell Trading Post NHS</i>	Examines the 160-acre Hubbell homestead to document historic and contemporary land use and determine conditions.	Froeschauer-Nelson, Peggy	NPS
1998	<i>Historic Farming and Contemporary Collaboration at Hubbell Trading Post National Historic Site</i>	Examines the relationships of Navajo people to land, places, and farming, and the interrelatedness of these aspects in the Navajo world. For continued agricultural success, HUTR must understand and effectively collaborate with the community.	Wilkins, J. Terresa	WNPA for NPS
1998	<i>Geophysical Investigation Hubbell Trading Post National Historic Site</i>	A land survey using ground-penetrating radar to determine the presence of underground storage tanks.	Sage Earth Science	Envirotech, Inc.
1999	<i>Fine Art Appraisal</i>	Provides current market values for paintings, drawings, framed art, photographs, and prints in the HUTR museum collection.	Bernard Ewell Art Appraisals	NPS
1999	<i>Hubbell Trading Post Entrance Road Bridge, Project: Arizona PRA-HUTR 1(1)</i>	Construction drawings and contract for installation of new entrance road bridge.	Department of Transportation, Federal Highway Administration	NPS
2000	<i>Parapet Study, Visitor Center HB 12</i>	Analysis and documentation of parapet stones condition.	Chamberlin, Ed	NPS
2000	<i>Evaluation of the High Shrink-Swell Soils in the Ganado Irrigation Project Area</i>	Analyzes soil conditions of the Ganado Valley and Ganado Lake areas.	Wangemann, Dr. Stephen G.	BIA-Navajo Area Office
2002	<i>A Cultural Resources Inventory for a Reforestation Project and Storage Building Construction at Hubbell Trading Post National</i>	A field survey and report to fulfill the requirements of the NHPA.	Zimmerman, David	NPS

Year	Title	Description	Author	Sponsor
	<i>Historic Site</i>			
2002	<i>Hubbell Trading Post Landscape, Cultural Landscape Inventory, Hubbell Trading Post National Historic Site</i>	Inventories and assesses the significance of landscape features and structures in the national historic site's cultural landscape.	Galbraith, Julie, and Kowalski, Judy	NPS
2003-2004	<i>Final Report for 2003 and 2004 Mammal Inventories on Selected National Park Service Southern Colorado Plateau Network Parks: Hubbell Trading Post National Historic Site</i>	Field study to document at least 90% of mammals, determine abundance and use of area, for the NPS Inventory and Monitoring Program.	Haymond, Shauna, and Sherwin, Richard E.	Navajo Nation Department of Fish and Wildlife
2004	<i>Inventory of Amphibians and Reptiles at Hubbell Trading Post National Historic Site</i>	Field study to document at least 90% of amphibians and reptiles, to determine baseline information and recommend environmental management for species, for the NPS Inventory and Monitoring Program.	Mikesic, David	Navajo Nation Department of Fish and Wildlife
2005	<i>Our Elders All Knew How to Farm</i>	The mitigation product for the rehabilitation of the Ganado Irrigation Canal Project. HUTR 28604	Archeological Consulting Services, Ltd.	Bureau of Reclamation
2005	<i>Hubbell Trading Post National Historic Site Museum Collection Facilities Plan</i>	Provides a preliminary storage plan for the facility and identifies who to contact to handle specific issues.	Chamberlin, Edward M.	NPS
2006	<i>Facility Condition Index Audit</i>	An analysis and ranking of the condition and deferred maintenance needs of structures in the national historic site.	NPS	NPS
2006	<i>API Comparison Report</i>	An analysis and ranking of importance of structures in the national historic site.	NPS	NPS
2006	<i>Avian Inventory of Hubbell Trading Post National Historic Site</i>	Field study to document at least 90% of extant breeding and migrant birds through visual and/or aural observation, for the NPS Inventory and Monitoring Program.	LaRue, Charles T., and Mikesic, David G.	Navajo Nation Department of Fish and Wildlife
n.d.	<i>Two-Story Barn Historic Structures Report Part II.</i>	Presents additional information on the Barn.	Levy, Benjamin, and Pope, Charles	NPS
n.d.	<i>Interim Furnishing Report and Plan, Hubbell Trading Post (HB01)</i>	Identifies character-defining features for the Hubbell Trading Post store, identifies historic furnishings, and presents a plan and guidelines for current and future furnishings in the store.	Chamberlin, Ed, Landrum, Christine, Pickle, Steve, Shibata, Naomi, Stone, Nancy, Tabaha, Kathleen, and	NPS/WNPA

Year	Title	Description	Author	Sponsor
			Worthington, Anne	
1978- Present	<i>XXX Compliance Forms and Navajo Nation Historic Preservation Compliance Forms</i>	Historic preservation compliance documentation (NHPA, Section 106), covering the years 1978 to Present.	Bauer, Wyatt, Chamberlin, Ed	NPS
1979 - 2000	<i>Resource Management Plans</i>	Lists proposed resource management projects. (Not all years included.)	Park staff	NPS

Appendix E: Planning and Data Needs Summary

The following summarizes and categorizes plans and data needs identified during the analysis of fundamental resources and values.

NPS: PLANS	NON-NPS (WNPA)	POLICY GUIDANCE	NPS DATA NEEDS	NON-NPS DATA NEEDS (WNPA)
Collections Condition Survey Collections Security Plan	Scope Of Sales Update	MOA With Navajo Nation And Apache County Sheriff For Safety Services	Ethnographic History for the Park	Data for a Marketing Strategy/Strategic Plan for Business Plan
Conservation/Replica Protection Plan	Marketing Strategy/Strategic Plan for Business (Business Plan)	MOA WPNA, Revised	Ethnographic Resources Inventory	
Ethnographic History of the National Historic Site		MOU Friends Group, Revised	Farming Best Practices Research/Evaluation	
Exhibit Plan (VC)		MOU WNPA for Operations of Historic Structures in the Historic District — Update/Review	Fire Suppression Evaluation/Testing — Annual	
Farm Business Plan for Animals and Crops		MOUs with Local Groups with Regard to the Maintenance Program (Equipment/Resources Sharing and Leverage)	Condition Assessment for FMSS	
Business Plan/ Practice		PA with FIPO for the Maintenance of Historic Structures and Cultural Landscape	Hazmat Evaluation of All Historic Structure (Centennial Challenge Signature Project)	
Historic Furnishings Plan				
Historic Structures Reports			Historic Photographs of Historic Structures (Interior and Exterior)	
Integrated Pest Management Plan			Integrate Pest Management Plan	
Scope of Collection Statement — Finalized			Park Asset Management Plan	
Structural Fire Plan			Ethnographic Plant Resources Within the Park Data	
Vegetation Management Plan			Heritage/Heirloom Plants Used Within the Cultural Landscape Data	
			Structure Fire Plan	
			Traditional Trading Post Operations Definition	
			Visitor Use Survey	

Appendix F: National Historic District Contributing Structures

- Trading Post (HB01)
- Hubbell Home (HB02)
- Two-Story Barn (HB03)
- Manager's House (HB04)
- Bunk House (HB05)
- Stone Hogan (HB06)
- Bread Oven (HB07)
- Chicken Coop (generator) (HB08)
- Park Offices (HB09)
- Corrals and Shed (HB10)
- Hogan-in-the-Lane (HB11)
- Visitor Center (HB12)
- Comfort Station (HB13)
- Root Cellar (Library) (HB16)
- Irrigated Field (HB18)
- Gazebo (HB28)
- Sun Dial/Cactus Bed (HB41)
- Stone Privacy Wall
- Wide Reed Ruins

Hubbell Trading Post NHS

Anne Worthington, superintendent
Woody Lawrence, maintenance mechanic supervisor
Eugene Tsosie, maintenance
Hernel Shondee, maintenance
Julius Smith, maintenance
Alton Joe, maintenance
Naomi Shibata, park ranger
Tina Lowe, interpretive ranger
Ed Chamberlin, curator
Kathy Tabaha, museum technician
Yolanda Lincoln, IT/budget
Alberta Shorty, personnel, purchasing
Larry Curtis, Student Conservation Association
Talbert Grey, Student Conservation Association

WNPA

LeAnn Simpson
Steve Pickle, Hubbell trader

NPS Intermountain Regional Office

Sande McDermott, technical expert/cultural resources

Petrified Forest NP

Lyn Carranza, technical expert/interpretation

Capital Reef NP

Dave Worthington, technical expert/natural resources

NPS Denver Service Center

Mary McVeigh, project manager
Leslie Peterson, team member

Retired NPS Personnel

Tom Vaughn, former superintendent, Hubbell Trading Post NHS

Friends of Hubbell

Thrude Breckinridge



As the nation's principal conservation agency, the Department of the Interior has responsibility for most of our nationally owned public lands and natural resources. This includes fostering sound use of our land and water resources; protecting our fish, wildlife, and biological diversity; preserving the environmental and cultural values of our national parks and historical places; and providing for the enjoyment of life through outdoor recreation. The department assesses our energy and mineral resources and works to ensure that their development is in the best interests of all our people by encouraging stewardship and citizen participation in their care. The department also has a major responsibility for American Indian reservation communities and for people who live in island territories under U.S. administration.

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