"An Orderly, Balanced and Comprehensive Panorama … of American History": Filling Thematic Gaps within the National Park System

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In 2009, the *Future Shape of the National Park System Committee Report* presented three important recommendations regarding the study of new units for the national park system as part of the work of the National Parks Second Century Commission. The ideal system must "adequately represent the American experience," "add important cultural themes not now well represented," and support "our constantly improving understating of the past, and the continuing progress of history." This report continues a long tradition of identifying the presence of "thematic gaps in the system" that must be addressed if the National Park Service (NPS) is to effectively and efficiently plan for "a system that works for all."[1] The origin and development of the national park system's thematic framework reveals a complex history of competing interests that presents both administrative and intellectual challenges if NPS is to implement the goals of the Second Century Commission.

In 1935, testifying before the Congress in support of the Historic Sites Act, Secretary of the Interior Harold L. Ickes argued that the proposals for a National Park Service survey of nationally significant historic sites would provide a foundation for a "unified and integrated system of national historical parks and monuments which, taken in their entirety, would present to the American people graphic illustrations of the Nation's history."[2] NPS historian Barry Mackintosh credits the idea of a thematic approach to historic site selection to the anthropologist and museum curator, Clark Wissler, who served as an advisor to the Department of the Interior from 1929 to 1947.[3] In 1929, reflecting his "culture area" approach to the classification of Native American groups, Wissler argued that "a selection should be made of a number of existing monuments which in their totality may, as points of reference, define the general outline of man's career on this continent."[4] With passage of the Historic Sites Act of 1935, the National Park Service was assigned the task of identifying those sites that possessed "exceptional value as commemorating or illustrating the history of the United States."[5]

During the late 1930s, NPS historian Verne Chatelain worked with other staff to develop the policies and procedures that would structure the Historic Sites Survey.[6] He noted

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four important points about the inclusion of historic sites within the national park system:

- The system should include "all types of areas that are historically important in our national development."
- Previous selection of historic sites worthy of preservation had not been conducted according to any plan.
- Pressure from patrons and politicians influenced the choices made by federal government to acquire (or not to acquire) historic sites.
- It was "unsound, uneconomical and detrimental" to study individual sites "without reference to the entire scheme of things."[7]

In preparation for the first meeting of the National Park System Advisory Board in 1936, Chatelain set forth the specific criteria—"certain matchless or unique qualities"—possessed by nationally significant historic sites. "The quality of uniqueness exists:

- In such sites as are naturally the points or bases from which the broad aspects of prehistoric and historic American life can best be presented, and from which the student of history of the United States can sketch the large patterns of the American story; which areas are significant because of their relationship to other areas, each contributing its part to the complete story of American History.
- In such sites as are associated with the life of some great American, and which may not necessarily have any outstanding qualities other than that association; and
- In such sites as are associated with some sudden or dramatic incident in American history which, though possessing no great intrinsic qualities, are unique and which are symbolical of some great idea or ideal for the American people."[8]

Each property, then, was to be an individual piece of a national jigsaw puzzle that when assembled provided a comprehensive illustration of the American experience.

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Assisting the National Park Service in evaluating the significance of individual properties were the members of the National Park System Advisory Board, a group of citizens with expertise in history, archaeology, anthropology, and historical or landscape architecture, as well as the sciences. In theory, the board acted as a buffer between the particularistic desires of proponents for federal recognition of individual historic properties and the pragmatic reality of the limited capacity of the National Park Service to maintain and interpret its growing portfolio of historic sites. At its first meeting, NPS Director Arno B. Cammerer warned the Advisory Board: "there must be a sound basis in policy for withstanding this pressure" to recommend sites as being nationally significant.[9]

From the mid-1930s until the advent of the Mission 66 program the designation of historic sites as being nationally significant was both a sensitive and secret undertaking. The deliberations and recommendations of the Advisory Board were kept confidential and any

proposals for the establishment of national historic sites had to be approved by both the Bureau of the Budget and the president. During this period, the leadership of the Historic Sites Survey worked with the members of the Advisory Board to develop criteria for the evaluation of potential historic sites, which serve as the foundation of the standards used today by the National Register of Historic Places and National Historic Landmark programs. The criteria functioned (and continue to function) as a limitation on the consideration of certain types of properties, such as most commemorative or reconstructed sites, birthplaces and boyhood homes, cemeteries and other religious properties, moved buildings, and sites associated with the recent past. These official criteria were essential for the National Park Service to deflect the influence of "Criterion P," meaning the inescapable role of power, patronage, and politics in influencing the fundamentally political decisions to recommend the acquisition and establishment of new units of the national park system.

As the National Park Service emerged from World War II and embarked on the Mission 66 program, Chief of Interpretation Ronald L. Lee set forth the state of the agency's thematic approach to American history. With a portfolio of 123 historic properties, the Park Service was "engaged in a broad program to preserve historic sites, buildings and objects of national importance, illustrating all the major phases of American history." Lee saw substantial value in the work of the Historic Sites Survey: "Just as libraries and museums classify their collections to make them more useful and to guide future accessions, so the National Park Service has found classification of sites and buildings indispensable to their proper administration." Such a system of evaluation was necessary because Congress and other patrons continuously requested that the National Park Service review potential units: in 1954, for instance, NPS considered 72 sites, of which only two were considered eligible. Yet at the same time Lee recognized that "a comparison of present holdings with the 15 categories reveals serious gaps" in the National Park Service's ability to preserve and interpret sites that form the chapters of a comprehensive textbook of American history. From his perspective, Lee estimated that it would take a generation for the National Park Service to complete the "slow task of rounding out Federal holdings."[10]

From the mid-1930s until the mid-1990s, the National Park Service's survey of nationally significant historic sites was guided by a chronological and thematic framework which outlined major periods in American history. In 1936, to guide the work of the Advisory Board and the Historic Sites Survey, Chatelain put forward 12 prehistoric culture groups, principally geographic in orientation, and 23 historical themes, which followed a chronological framework. Due to funding constraints and the requirement that NPS staff prioritize the review of congressionally proposed properties, the progress of the survey was slower than expected. In the late 1930s, the Park Service estimated that a comprehensive survey of historic sites would take eight years of study and a $24,000 annual appropriation.[11] By 1943, 560 historic sites had been reviewed, of which 40% (n=229) had been classified as being nationally significant. Of these, only 18 (about 8% of the significant properties) had been designated as national historic sites. Some of these properties were under federal steward-

ship, others were protected through a cooperative agreement with a stewardship organization. More than 330 archaeological sites had been classified, with about 9% being considered of national importance.[12]

Just before many of the operations of the National Park Service were suspended by the advent of World War II, Fiske Kimball, one of the original Advisory Board members, personally compiled a list of nationally significant examples of American architecture within the original thirteen colonies. Director of the Philadelphia Museum of Art and a noted architectural historian, Kimball recalled that as the small National Park Service staff was "kept too busy reporting on single sites currently in question," a few members of the Advisory Board "took the initiative" to develop comprehensive lists of the most important sites in different fields. "I undertook a list of surviving buildings which could be regarded as of national significance—not only for events which took place there but equally for their artistic importance."[13] In late October 1941 the Advisory Board adopted Kimball's "Annotated List of Structures of Outstanding Architectural Merit."[14]

The difficult work of thematically identifying nationally significant historic properties was resuscitated with the Mission 66 program. As noted by Mackintosh, "reactivation of the Historic Sites Survey was proposed in the context of planning for the orderly rounding out of the National Park System." In the mid-1950s, Bernard DeVoto, an Advisory Board member, noted that although surveys for 11 of the 15 themes had been completed, four themes remained incomplete and barely understood.[15] "The [Mission 66] prospectus, describing the survey as 'approximately half completed' when terminated by the war, declared that it needed to be 'completed, brought up-to-date, and kept current.'"[16] To support completion of the survey, which the National Park Service estimated would take four years, the Advisory Board established a consulting committee for the National Survey of Historic Sites and Buildings and revised the thematic structure, combining historic and prehistoric properties into one framework. At the same time the secretary of the interior established "national historic landmarks" as a category of federal recognition that was the immediate and publicly accessible outcome of the work of the Historic Sites Survey. Because of the established criteria for national historical significance, recognition of a property as a national historic landmark is considered a prerequisite for consideration as a new historical park unit.[17]

As the end of the Mission 66 program approached, the federal survey of nationally significant historic sites remained unfinished, although in 1965 its accomplishments received praise from President Johnson.[18] In 1966, the National Historic Preservation Act expanded federal recognition of historic sites to include properties of local and state significance, illustrating the emphasis of the "new preservation" on aesthetic, environmental, and community values found in the recognition of historic places in contrast to the traditional focus on associative values. At the same time, NPS reorganized the Historic Sites Survey in recognition of the fact that a comprehensive survey of American history could never be completed. By one contemporary estimate, the architecture theme alone would require up to 11 years to update and complete.[19]

As the 1960s came to a close, Secretary of the Interior Walter J. Hickel repeated the goal, expressed periodically since the 1930s, that the National Park Service should protect and interpret the "best examples of … the important landmarks of our history" and that "there

are serious gaps and inadequacies which must be remedied while opportunities still exist if the System is to fulfill the people's need always to see and understand their heritage of history." The secretary directed the National Park Service to "continue your studies to identify gaps in the System and recommend to me areas that would fill them. It is my hope that we can make a significant contribution to rounding out more of the National Park System in these next few years."[20]

One result of this directive was *Part One of the National Park System Plan*, which set forth a restructured thematic framework that comprised nine themes, 43 subthemes, and 281 facets which were used to categorize American history. In the study, the National Park Service defined a "well rounded" system as being one in which all facets of the American history thematic framework were represented in one or more park units. Moreover, "regardless of the percentage of representation, no theme or sub theme is represented so long as a prime site, such as Mount Vernon or Valley Forge, remains outside the National Park System." As of 1970, the National Park System included 163 historical units, which represented only 30% of all the identified facets of American history.[21]

Having participated in the analysis of how well the units of the national park system reflected the full range of American history, the Advisory Board endorsed the results and recommendations of the study. In June 1970, Secretary Hickel moved quickly to ensure that the study could not be "misconstrued as approval of any program to acquire specific sites." He was deeply concerned that the report's recommendation that nearly 200 major facets of American history were unrepresented in the park system "could lead to the erroneous conclusion, possible even in Congress, that we now have plans to take over administration of Mount Vernon plus 196 other historical sites." For at least one theme, intellectual currents within a contemplative society, the secretary questioned whether the park system was a "valid … place for interpreting this theme at all."[22] This 1970 report represents the most recent comprehensive analysis of how well the national park system recognizes, preserves, and interprets places associated with nationally significant persons, events, trends, and culture in our collective history, and was cited by the analysis of the Second Century Commission.[23]

The National Park Service's role in the thematic study of places highly significant in American history was again institutionalized in the early 1980s with the publication of 36 CFR Part 65, the federal regulations that govern the operation of the National Historic Landmarks Program. The regulations state that potential national historic landmarks "are identified primarily by means of theme studies and in some instances by special studies" of individual properties.

> NPS defines and systematically conducts organized theme studies which encompass the major aspects of American history. The theme studies provide a contextual framework to evaluate the relative significance of historic properties and determine which properties meet National Historic Landmark criteria.[24]

The regulations also provided how the National Park Service prioritizes preparation of theme studies and special studies for historic properties outside of active theme studies. The

thematic framework referenced in the regulations is found in *History and Prehistory in the National Park System and the National Historic Landmarks Program*.[25]

As a result of a congressional directive in 1991, the National Park Service worked with the Organization of American Historians to develop a "significant departure" from previous thematic frameworks (Figure 1). *History in the National Park Service: Themes and Concepts* (1994) represented a "completely rethought, revised thematic framework" which identified eight concepts that reflect a "less compartmentalized approach to American History." Described as "less restrictive" than previous versions, the revised thematic framework "emphasizes the process of how to study history, but does not identify what to study." Specific topics for theme studies and site-specific special studies would continue to be identified via congressional mandate, NPS planning needs, and the judgment of NPS staff. The revised thematic framework was also recommended for use by existing park units to include and expand "themes for which individual parks were not originally specifically designated" by Congress.[26]

The 1998 National Parks Omnibus Management Act established the current process for identifying and authorizing studies of new units of the National Park System. Over the last

Figure 1. National Park Service Thematic Framework, 1994.

decade, the National Park Service has declined to make recommendations to Congress regarding the study of new units, as mandated in the act, principally because Congress itself has encumbered the National Park Service with numerous special resource study mandates. Since 2001, the National Park Service has recommended against establishing new historical units of the National Park System about 75% of the time, with five units being recommended at the completion of a special resource study. As Ronald Lee noted in 1954, "many are called, but few are chosen."[27]

One result of the administrative changes made during the 1990s to the way potential new national parks are evaluated and recommended to Congress is that the National Park Service again finds itself in "haphazard" situation, as in the mid-1930s, "without a thought to a general pattern emphasizing typical key sites."[28] In effect, over the last decade the National Historic Landmarks Program has had the legislative and regulatory mandate to conduct thematic studies, but not the funding, while the Park Planning Program has somewhat better access to funding but requires further congressional authorization to conduct theme studies. Left unclear is the role of the National Park System Advisory Board in the review of potential new park units. At present the Advisory Board's principal statutory mandate is in the recommendation of national historic landmarks, which, because of the criteria of national significance, is a critical step in the evaluation of new units of the national park system.[29]

One of the fundamental questions raised throughout the history of the National Park Service's thematic framework is: How can the Park Service develop a system of identification and evaluation to ensure that "sites reflecting the complexity of the American experience" are preserved and interpreted for the benefit of the American people? In the mid-1950s, Ronald Lee expressed the continuing goal of the National Park System to preserve "only outstanding examples in each class … so that Federal holdings emerge as an orderly, balanced and comprehensive panorama of principal sites and scenes of American history."[30] Lee's approach reflects a time when a broad consensus existed in the academic community, and among much of the public, regarding the most important themes in American history. As the historian Roger Launius recently noted: "Throughout most of American history, many Americans' conceptions of their past has been informed by views of nationalism, exceptionalism, and triumphalism."[31]

Since the mid-1960s, that consensus has broken down, at least among many academic historians, helping to generate a paradigm shift visible in the 1990s transformation of the National Park Service thematic framework. The rise of the "new preservation," with its emphasis on artistic, environmental, and diachronic qualities of historic districts (as opposed to traditional associative values found at particularistic historic sites) can be linked to the growth of "new social history" and the "battle for control of the national memory" where "revisionist history" is at the same time celebrated and denounced.[32]

How, then, in an environment where there is perhaps little general consensus about what patterns, persons, and properties are indeed worthy of federal protection, can the National Park Service hope to fulfill its mission to create "a system that works for all" while responding to

multiple congressional mandates to study and evaluate individual potential parks? The selection of a historic place to become a unit in the national park system is, in the broadest sense, a process of consensus-building; one that must ensure that new additions add substantial value to the system and are truly worthy of perpetual stewardship.

Review of the origins and development of the National Park Service thematic framework illustrates the continuous influence of patrons and politicians—factors known unofficially as "Criterion P"—that must be openly addressed by the National Park Service through the application of a robust and structurally sound process used in the identification and evaluation of new national historic landmarks and historical park units. As noted by Kimball, since 1935 the National Park System Advisory Board has struggled to harmonize the conflict between the pragmatic and "long-range views" of the National Park Service leadership and the "inconsequent opportunism" of particularistic site boosters wishing to influence the selection of new historical park units.[33]

A long-term view also reveals that a comprehensive survey of American historic sites will never be completed; each generation will add new units to the system, properties that, in fact, say as much about ourselves and how we view and value historic places as they do about the past. With more than 2,400 national historic landmarks currently designated, it is also clear that the National Park Service will never be the steward for most of the nationally significant historical sites. Within the context of the historical development of National Park Service's thematic framework, the Second Century Commission's recommendation for a "larger vision" that would identify "themes currently poorly represented" within the national park system is an important first step in the difficult process of creating a broad consensus about which nationally significant historic properties are, and which sites are not, "critical to preserving the national heritage."[34]

The views and conclusions in this essay are those of the author and should not be interpreted as representing the opinions or policies of the National Park Service or the United States government.

Endnotes

1. Denis P. Galvin, John Fahey, Belinda Faustinos, Gretchen Long, Jerry L. Rogers, and Margaret Wheatley, *Future Shape of the National Park System Committee Report: A System that Works for All* (Washington, D.C.: National Park Service Second Century Commission, 2009). See also Richard West Sellars, "The National Park System and the Historic American Past: A Brief Overview and Reflection," *The George Wright Forum*, vol. 24, no. 1 (2007) pp. 8-22; and Janet A. McDonnell, "Reassessing the National Park Service and the National Park System," *The George Wright Forum*, vol. 25, no. 2 (2008), pp. 6–14.
2. Hearings before the Committee on the Public lands, House of Representatives, Seventy-Fourth Congress, First Session, on H.R. 6670 and H.R. 6734. April 1, 2, and 5, 1935 (Washington, D.C.: Government Printing Office), statement of Secretary of the Interior Harold L. Ickes, p. 5.

3. Barry Mackintosh, *The Historic Sites Survey and National Historic Landmarks Program: A History* (Washington, D.C.: National Park Service, 1985), pp. 7–12.
4. *Reports with Recommendations from the Committee on Study of Educational Problems in National Parks*, January 9, 1929, and November 27, 1929 (Washington, D.C.: Department of the Interior), p. 24 (quoted in Mackintosh, *Historic Sites Survey,* p. 8).
5. Historic Sites Act of 1935, as amended, 49 Stat. 666, 16 U.S.C. 461–467. From 1935 until the establishment of national historic landmarks as a category of federal recognition in 1960, the National Park Service's survey identified potential candidates for designation as national historic sites.
6. Charles B. Hosmer, Jr., "Verne Chatelain and the Development of the Branch of History of the National Park Service," *The Public Historian*, vol. 16 (winter 1994), pp. 24–38.
7. Memorandum dated December 12, 1932; Mackintosh, *Historic Sites Survey,* p. 8. Quoted in Harlan D. Unrau and G. Frank Williss, *Administrative History: Expansion of the National Park Service in the 1930s* (Denver: National Park Service, 1983), pp. 164–165.
8. Verne E. Chatelain, "Suggested Statements of Principles and Standards Involving National Historical Areas." Attached to "A National Policy for Historic Sites and Monuments," National Park System Advisory Board Meeting Minutes, Washington, D.C., February 13–14, 1936. These three criteria were put forth by the National Resources Board's "Report on the Development of the Nation's Recreational Resources" (submitted December 1, 1934) and reprinted in J. Thomas Schneider, *Report to the Secretary of the Interior on the Preservation of Historic Sites and Buildings* (Washington, D.C.: Department of the Interior, 1935), pp. 2–3.
9. Members of the Advisory Board took seriously their charter that only the very best sites should be recommended for federal stewardship; as Chairman Waldo Leland noted: "I think we should encourage the disapproval of lesser things." Minutes of the First Meeting of the Advisory Board on National Parks, Historic Sites, Buildings and Monuments, Department of the Interior, Washington, D.C., February 13–14, 1936, pp. 31, 66, 72. National Park Service, National Historic Landmarks Program.
10. Ronald F. Lee, "The State and Federal Governments and Historical Restoration," draft paper, dated December 20,1954, presented to American Historical Association. p. 11; Library of Congress, Manuscript Division, Papers of Waldo G. Leland, Box 22. The recognition of historic places as "national historic landmarks" was established by the secretary of the interior in 1959.
11. Untitled paper in Historic Sites Survey File, quoted in Mackintosh, *Historic Sites Survey,* p. 19.
12. Mackintosh, *Historic Sites Survey,* p. 20.
13. Philadelphia Museum of Art Archives, Fiske Kimball Papers, Box 159, "Historic Monuments," p. 32.
14. Originally presented in 1938, Kimball's inventory was preliminarily adopted by the Advisory Board in 1940. "Dr. Fiske Kimball's Annotated List of Structures of Outstanding Architectural Merit," Minutes of the Eighth Advisory Board meeting, August 15–18,

1938. "Sites Classified as Eligible under Arts and Sciences in the Historic Sites Survey (List Presented by Dr. Fiske Kimball)," Minutes of the Thirteenth Advisory Board Meeting, October 28–30, 1940. "The Arts and Sciences, Architecture, (13 Original Colonies)," Minutes of the Fifteenth Advisory Board Meeting, October 28–30, 1941.

15. Mackintosh, *Historic Sites Survey,* pp. 32–33. The underdeveloped themes were: "Commerce, Industry & Agriculture to 1890"; "Means of Travel and Communication"; "Exploitation of Natural Resources to 1890"; and "The Arts and Sciences to 1870."
16. Mackintosh, *Historic Sites Survey,* p. 33, quoting "Mission 66: To Provide Adequate Protection and Development of the National Park System for Human Use," January 1956.
17. Mackintosh, *Historic Sites Survey,* p. 33–36.
18. Ibid., pp. 57–58.
19. Ibid., pp. 59–63. The quest for a comprehensive survey of historic sites continued into the Nixon Administration, which issued Executive Order 11593 in May 1971. This EO mandated that all federal agencies would "locate, inventory, and nominate … all sites, buildings, districts, and objects under their jurisdiction or control that appear to qualify for listing on the National Register of Historic Places" by July 1, 1973.
20. Secretary of the interior to director, National Park Service, "Management of the National Park System," June 18, 1969.
21. *Part One of the National Park System Plan: History* (Washington, D.C.: National Park Service,1972). Themes (e.g., "The Original Inhabitants") were defined as broad general groupings. subthemes (e.g., "The Earliest Americans") were considered the basic units of study, and facets ("Migrations from Asia") were important aspects of individual subthemes.
22. "Future of the National Park System," memorandum from chairman, Advisory Board on National Parks, Historic Sites, Buildings and Monuments, April 23, 1970, to secretary of the interior. "Advisory Board's April 23, 1970, Memorandum, 'Future of the National Park System,'" secretary of the interior to chairman, Advisory Board on National Parks, Historic Sites, Buildings and Monuments, June 10, 1970.
23. Galvin et al., *Future Shape of the National Park System Committee Report,* p. 2.
24. See 36 CFR Part 65. The national historic landmark regulations contain six criteria of significance, while the National Register of Historic Places Program has only four criteria.
25. National Park Service, *History and Prehistory in the National Park System and the National Historic Landmarks Program* (Washington, D.C.: NPS,1982; revised 1987).
26. National Park Service, *History in the National Park Service: Themes and Concepts* (Washington, D.C.: NPS, 1994; revised 2000).
27. National Park Service, *Criteria for New Parklands* (Washington, D.C.: NPS, 2005). NPS established criteria for national significance, suitability, and feasibility for use in studying potential new park units. National Park Service Authorized Studies (February 2010) contains information on the 20 special resource studies transmitted to Congress since 2001 as well as on 38 additional studies conducted by the NPS Park Planning and

Special Studies Division. See also Lee, "The State and Federal Governments and Historical Restoration." p. 10.

28. In 1936, National Park Service historians found themselves "involved in a planless [sic] situation" and struggled to formulate "tentative, experimental policies" that would govern the federal survey and the evaluation of historic sites. Minutes of the First Meeting of the Advisory Board, February 13–14, 1936, pp. 29, 32–33. National Park Service, National Historic Landmarks Program.
29. Cooperation between these two programs has produced multi-volume theme studies on the history of American civil rights that has led to the designation of several national historic landmarks, and has laid the foundation for the consideration of new park units. For example, see National Park Service, *Racial Desegregation in Public Education in the United States* (Washington, D.C.: National Park Service), 2000; *Civil Rights in America: A Framework for Identifying Significant Sites* (2002); *Civil Rights in America: Racial Desegregation of Public Accommodations* (2004); *Civil Rights in America: Racial Voting Rights* (2007).
30. Lee, "The State and Federal Governments and Historical Restoration." Lee served in a variety of leadership positions within NPS history programs from 1938 to the early 1950s.
31. Roger D. Launius, "Federal History and National Identity: Reflections from the Trenches" (the Roger R. Trask Award Lecture, 2009), *Federal History Online* (2010), p. 75.
32. Ibid., p. 76.
33. Philadelphia Museum of Art Archives, Fiske Kimball Papers, Box 159, "Historic Monuments," p. 32.
34. Galvin et al., *Future Shape of the National Park System Committee Report,* p. 2.

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