National Park Service
U.S. Department of the Interior
Interior Regions 6, 7, and 8 (legacy Intermountain Region)

Sand Creek Massacre National Historic Site

Administrative History, Volume II
(2007–2017)

Denver Service Center, National Park Service

Edited and with an introduction by Laura A. Miller, Ph.D.

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Contributors:

NPS Denver Service Center-Planning Division
Hillary Conley, Cultural Resource Specialist
Suzanne Digre, Contract Editor
Tom Gibney, Project Manager
Westby Mize, Cultural Resource Specialist
Cynthia Nelson, Branch Manager
Marlena Polkow, Contract Planning Technical Specialist
Christie Riebe, Contract Editor

NPS Regional Office Serving DOI Regions 6, 7, and 8
Angela Sirna, Ph.D., Lead Historian for Park History Program
James T. Lindberg, Intern, Cultural Landscapes Program

Sand Creek Massacre Foundation
Alexa Roberts, Ph.D., Interim Board Chair of the Sand Creek Massacre Foundation and former Superintendent of Sand Creek Massacre National Historic Site

Sand Creek Massacre National Historic Site
Janet Frederick, Superintendent, Sand Creek Massacre National Historic Site

Historical Consultant
Laura A. Miller, Ph.D., independent historian and historical consultant

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In Partnership with
the Organization of American Historians/National Park Service

June 2024

Cover Image:
A frosty February in the the creek bed at Sand Creek Massacre National Historic Site. February 16, 2019, NPS Staff

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Recommended by:

ANGELA SIRNA Digitally signed by ANGELA SIRNA
Date: 2024.03.12 13:01:28 -06'00'

Angela Sirna, *Lead Historian, Intermountain Regional Office*

Approved by:

JANET FREDERICK Digitally signed by JANET FREDERICK
Date: 2024.03.12 12:54:44 -06'00'

Janet Frederick, Superintendent, Sand Creek National Historic Site

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List of Abbreviations

ANILCA	Alaska National Interest Lands Conservation Act
AIRFA	American Indian Religious Freedom Act
CFR	Code of Federal Regulations
CMRs	Collection Management Reports
CESU	Cooperative Ecosystems Study Units
CIRCLE	Council for Indigenous Relevancy, Communication, Leadership, and Excellence
CEQ	Council on Environmental Quality
CRIS	Cultural Resources Inventory System
FONSI	Finding of No Significant Impact
FRVs	Fundamental resources and values
GSA	General Services Administration
GIS	Geographic information system
HABS	Historic American Building Survey
HS-CRIS	Historic Structures in the Cultural Resources Inventory System
IDP	Interpretive Development Program
LWCF	Land and Water Conservation Fund
NCPTT	National Center for Preservation Technology and Training
NEPA	National Environmental Policy Act
NHLs	National Historic Landmarks
NHPA	National Historic Preservation Act
NMAI	National Museum of the American Indian
NPS	National Park Service
NAGPRA	Native American Graves Protection and Repatriation Act
PEPC	Planning, Environment & Public Comment
PMIS	Project Management Information System
RSS	Resource stewardship strategy
SAND	Sand Creek Massacre National Historic Site
SHPO	State historic preservation officer
THPO	Tribal historic preservation officer
USDA	United States Department of Agriculture
VIP	Volunteer in Parks program
WASO	Washington Support Office (NPS)
WACC	Western Archeological and Conservation Center
WNPA	Western National Parks Association

Sand Creek Massacre National Historic Site and National Park Service-Tribal Relations in the American West

A Brief History

Laura A. Miller, Ph.D.

The establishment of Sand Creek Massacre National Historic Site (SAND) and its public opening in 2007 is an important chapter in the history of the National Park Service (NPS) and its relationship with Native American tribes. For almost a century, the federal government obscured or minimized the history and culture of Native Americans at the national parks. Sand Creek Massacre National Historic Site, by contrast, centers the experiences of tribal communities in the past and present in its interpretation of the US Army's 1864 massacre of a peaceful camp of Cheyenne and Arapaho people in southeast Colorado Territory. In doing so, the site asks visitors to reckon with the federal government's complicity in the violent process of westward expansion and Native American displacement. The site's close tribal partnerships and sensitivity to tribal needs has been the result of decades of indigenous activism, federal policy change, and internal NPS efforts to improve its relationship with Native American tribes. This was not an easy process, as the following pages illustrate.

There are many threads that make up the long, fraught history of National Park Service-tribal relations; several of those threads intersect at Sand Creek. This short essay seeks to contextualize the history of Sand Creek Massacre National Historic Site within the history of America's national parks, monuments, and historic sites from the 1860s to the present. The early history of America's national parks is inextricably linked with the history of the federal government's removal of Native Americans to reservations. To create national parks in the late 1800s and early 1900s, the federal government forcibly removed tribes from their native homelands and denied them access to those lands for traditional uses such as hunting, fishing, foraging, and spiritual practices and ceremonies. At the same time that the federal government was removing Native Americans from its new national parks, it also began preserving ancestral Native American archeological sites in the Southwest—a process that was facilitated by the passage of the Antiquities Act in 1906. By the 1930s, a new NPS history program and a nascent federal historic preservation movement sought to preserve sites of historical importance in the American West.

The 1935 Historic Sites, Buildings and Antiquities Act (known as the Historic Sites Act) made these efforts part of a broader federal policy and helped guide the NPS's expansion into historic preservation. Many of these sites in the Western United States were what NPS historian Richard West Sellars called "westward expansion parks" that preserved a narrow range of perspectives—primarily those of White, European-American settlers—and prioritized a patriotic, pro-expansion, and mythologized interpretation of Western history.[1] This interpretation marginalized or ignored the history of Native American communities and the devastating legacy of western settlement on their people. The NPS purposefully distinguished these *historic* sites from the Native American *archeological* sites, which they considered outside of American history and in the realm of the "prehistoric." Designating archeological sites as "prehistoric" implied that the sites were associated with people long gone from the region; in reality, their descendants were usually not far away. The NPS also used this designation to justify taking possession of cultural materials, including artifacts and historic structures, without tribal consent.

Collectively, this evolution of the nation's parks, monuments, and historic sites shaped narratives about Native American history and culture that remained stubbornly persistent for decades to come. Native communities were written out of the history of the national parks and denied the agency to tell their own histories and connections to these lands. National Park units either erased Native American history from Western landscapes in service of wilderness preservation (as at parks like Yosemite, Glacier, and Yellowstone); portrayed Native Americans as synonymous with the prehistoric past (in the Southwest's archeological sites); or portrayed them as failing cultures that were no match for the westward march of European-American civilization (at the "westward expansion parks"). Even though Native American history is absolutely central to understanding the history of the American West, it remained on the margins of NPS interpretation for nearly a century.[2] Not until the 1970s was there any meaningful change in NPS-tribal relationships, and even then, change came *very* incrementally. It was driven by Native American activism combined with federal legislative improvements, a growing body of historical scholarship critical of celebratory westward expansion narratives, and a growing recognition among NPS personnel that the agency needed to tell more diverse and critical narratives about American history.

The creation of Sand Creek Massacre National Historic Site followed decades of Native activism demanding that the federal government acknowledge tribal sovereignty and reckon with its violent, imperialist history in the American West. The site, developed through a close working partnership with the Cheyenne and Arapaho tribes, tells the

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[1] Richard West Sellars, "War and Consequences: The American Indian Movement vs. the National Park Service at Fort Laramie," *National Parks Traveler*, April 2011, http://npshistory.com/publications/sellars/npt-1.pdf.

[2] Derek Bousé, "Culture as Nature: How Native American Cultural Antiquities Became Part of the Natural World," *The Public Historian* 18, no. 4 (Autumn 1996), 96.

history of Native American resilience in the face of violence, devastation, and loss at Sand Creek in Eastern Colorado. In telling this history of state-sponsored violence, the park rejects the celebratory narratives of the West that have dominated NPS interpretation. The fact that such a historic site could be created at all suggests how far the agency has come in confronting its own past and improving its relationship with tribal communities—with the caveat that this work is an ongoing process and remains inconsistent and incomplete.

To fully recognize how Sand Creek Massacre National Historic Site came to be and why its history is worth knowing, it is important to understand this broader history of the national parks and their long, often fraught history with tribal communities. Although this essay focuses primarily on the American West, many of the issues examined here apply to NPS relationships with indigenous communities throughout the country. Several scholars have examined the history of relationships between different tribes and the NPS, and collectively their work has created a robust body of scholarship. I encourage readers to use this document and its bibliography as a starting point and road map for further reading and research.

Creating Wilderness from Inhabited Landscapes: The First National Parks

Federal efforts to create national parks in the American West began in earnest during the Civil War with Congress's passage of the Yosemite Act in 1864. The land grant preserved the Yosemite Valley and the Mariposa Grove of sequoias under California's protection for the enjoyment of the public.[3] (Yosemite became a federally controlled national park in 1890, and the state-controlled Yosemite Valley and Mariposa Grove were added to the park in 1906.) Preservationists, Republican politicians, and other supporters of the idea believed that the preservation of the stunning scenic landscape could serve as a unifying measure for the fractured nation.[4] Historians Rolf Diamant and Ethan Carr argue that the act was "a wartime measure" and "an intentional assertion of a steadfast belief in the eventual Union victory and an acknowledgment of the political debt owed to California loyalists."[5] The legislation was also representative of the federal government's use of land grants—including the Homestead Act, the Morrill Land Grant College Act, and the Pacific Railway Act (all

[3] The Center for Legislative Archives, "S. 203, Introduced March 28, 1864," National Archives and Records Administration, https://www.archives.gov/legislative/features/national-park-service/yosemite.html.

[4] Mark David Spence, *Dispossessing the Wilderness: Indian Removal and the Making of National Parks* (New York: Oxford University Press, 1999), 37; Rolf Diamant and Ethan Carr, *Olmsted and Yosemite: Civil War, Abolition, and the National Park Idea* (Amherst, MA: Library of American Landscape History, 2022), 55.

[5] Diamant and Carr, *Olmsted and Yosemite*, 55.

passed in 1862)—to drive migration, settlement, and development in the Western United States. Those acts ensured that migrants would continue to encroach on Native lands and come in conflict with tribes already settled across the Western landscape.[6]

While Congress was creating new national parks throughout the Western United States, the federal government was forcing Native Americans to move onto tribal reservations.[7] This was no coincidence. Several parks were created in the late 1800s and early 1900s, before the establishment of the National Park Service in 1916. At parks including Yellowstone, Yosemite, and Glacier National Parks, the government denied tribes access to the landscapes that once sustained them, sometimes forcibly, in order to create the appearance of uninhabited wilderness.[8] Before the government appropriated them for the recreational enjoyment of tourists, these lands were Native American homelands that sustained communities who hunted, fished, and shaped the landscapes. They were not wilderness. By removing the tribes from these landscapes, the US government also erased them from the history of the national parks.

Several historians have examined this history in detail. The creation of the nation's first national park in 1872, Yellowstone National Park, provides a useful example. Both Mark David Spence's *Dispossessing the Wilderness: Indian Removal and the Making of National Parks* (1999) and Karl Jacoby's *Crimes Against Nature: Squatters, Poachers, Thieves, and the Hidden History of American Conservation* (2003) examine the impact that the creation of Yellowstone National Park had on the Crow, Shoshone, and Bannock tribes.[9] The tribes used the land for hunting, fishing, foraging, and cultural burning with the understanding that negotiated treaties with the federal government gave them the right to hunt off-reservation on unoccupied federal lands.[10] Park regulations, however, criminalized these tribal uses of the land. The government increasingly saw the tribes as a direct threat to the park—so much so, that by 1886, Yellowstone was being managed and protected by the US Army.[11] The conflict ultimately went to the Supreme Court where, in 1896, the justices ruled in *Ward v. Race Horse* that Wyoming, because it was established as a state in 1890 (after the 1868 treaties), did not need to recognize those treaties or tribal hunting rights.[12]

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6 Diamant and Carr, *Olmsted and Yosemite*, 55.

7 Spence, *Dispossessing the Wilderness*, 7.

8 Spence, *Dispossessing the Wilderness*, 5.

9 See Karl Jacoby, *Crimes Against Nature: Squatters, Poachers, Thieves, and the Hidden History of American Conservation* (Berkeley and Los Angeles: University of California Press, 2003), "Part II: Mountain: Yellowstone," 81–146, and Spence, *Dispossessing the Wilderness*, Chapters 3 and 4, pages 41–70.

10 Spence, *Dispossessing the Wilderness*, 50–51. For more information on the practice of cultural burning, see National Park Service, "Indigenous Fire Practices Shape Our Land," NPS.gov, https://www.nps.gov/subjects/fire/indigenous-fire-practices-shape-our-land.htm.

11 Spence, *Dispossessing the Wilderness*, 62.

12 Spence, *Dispossessing the Wilderness*, 68.

The history of Glacier National Park in Montana provides another example. Mark David Spence describes how the eastern lands of what became Glacier National Park in 1910 were once part of the Niitsitapi (Blackfeet) reservation. Those lands held tremendous spiritual significance and also provided sustenance for the Niitsitapi people, who used the lands for hunting, gathering, and timber collection. Under duress, the tribe sold their land to the federal government in 1895, with the agreement that they could continue to have usufruct rights to the property. When the land became part of Glacier National Park in 1910, federal officials reneged on this agreement, claiming that the creation of the park overrode tribal claims to use the land for hunting and gathering.[13] Spence argues that "For Americans . . . Glacier was one of the nation's most spectacular 'crown jewels,' and Blackfeet use of park lands threatened to tarnish its luster."[14] The government prioritized White tourists' recreational enjoyment of the land over tribal sustenance.

Spence argues that "wilderness preservation went hand in hand with native dispossession."[15] Similarly, environmental historian Karl Jacoby suggests that "conservation was for Native Americans inextricably bound up with conquest."[16] In the service of creating wilderness, the federal government used park officials, the military, and the courts as tools to keep tribes out of the national parks.[17] Throughout the last century, the fight for Native American civil rights by tribal nations seeking access to and use of their traditional lands played out in parks throughout the United States.

National Monuments and National Historic Sites

Tribal communities have a stake not only in parks with vast natural beauty like Yellowstone and Yosemite, but also in many of the NPS's cultural and historic sites. Not long after the federal government began preserving big, scenic national parks like Yellowstone, Yosemite, and Glacier, preservationists turned their attention to protecting Native American archeological ruins and cultural artifacts in the American Southwest. As these sites became more well known, they attracted collectors and artifact hunters who vandalized and looted the sites, prompting federal concerns about their protection.[18] Congress passed legislation in

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[13] See Spence, *Dispossessing the Wilderness*, chapters 5 and 6.

[14] Spence, *Dispossessing the Wilderness*, 72.

[15] Spence, *Dispossessing the Wilderness*, 3.

[16] Jacoby, *Crimes Against Nature*, 151.

[17] In their history of Death Valley National Park, home to the Timbasha Shoshone tribe, historians Hal Rothman and Char Miller argue that the "oft-lethal combination of legal principle and national identity framed around 'empty wilderness' devastated Native Americans." Hal Rothman and Char Miller, *Death Valley National Park: A History* (Reno, NV: University of Nevada Press, 2013), 70.

[18] Denise Meringolo, *Museums, Monuments, and National Parks: Toward a New Genealogy of Public History* (Amherst and Boston: University of Massachusetts Press, 2012), 45.

1889 to create Casa Grande Ruin Reservation in Arizona (today Casa Grande Ruins National Monument), which preserves the multi-storied Great House and lower room ruins of a farming community of the ancestral Sonoran Desert people. The protection of Casa Grande was the first step in a much larger federal effort to preserve many of the Southwest's archeological sites, culminating in the passage of the Antiquities Act in 1906. The government did not consult with descendant tribes in these preservation efforts.

Historian Hal Rothman argued that the Antiquities Act was "the most important piece of preservation legislation ever enacted by the United States government."[19] It allowed US presidents to create national monuments by executive order, with few restrictions and without Congressional legislation. The Act could be used to preserve a wide range of places a president deemed worthy of federal protection, including sites of archeological, historical, natural, and scientific interest. As Rothman noted, the legislation's "amorphous nature gave it a significance that belies its narrow title"—it held tremendous power as a preservation tool.[20]

The Antiquities Act was created largely with the Southwest's archeological sites in mind (although it was a geologic feature that drove efforts to preserve the first National Monument, Devils Tower, in 1906).[21] In 1906 and 1907, President Theodore Roosevelt designated several Native American archeological sites as national monuments including El Morro National Monument (1906), Montezuma Castle (1906), Petrified Forest (1906), Chaco Canyon (1907), Gila Cliff Dwellings (1907), and Tonto (1907). From the beginning, researchers categorized these sites as prehistoric—in the realm of archeology, rather than history—and this distinction effectively served to situate their Native American history *outside of* American history.[22] Historian Denise D. Meringolo argues that this "was part of a larger ideological project to reinforce the belief that indigenous peoples were irrelevant to the nation's historical past." Importantly, she adds, "Traditional historians were complicit" in this process.[23]

In the 1920s and 1930s, NPS leadership increasingly realized that, if the agency was truly a "national" park service, it needed to expand its reach and develop parks east of the Mississippi. Until the 1930s, Maine's Acadia National Park was the only park in the eastern United States. Congress responded by authorizing the creation of three new parks: Shenandoah (authorized in 1925 and dedicated in 1935), Great Smoky Mountains (authorized in 1934 and dedicated in 1940), and Mammoth Cave (authorized in 1926 and dedicated in 1941). To expand further, however, NPS officials looked to the development of

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[19] Hal Rothman, *America's National Monuments: The Politics of Preservation* (Lawrence, KS: University Press of Kansas, 1989), xi, xiii.

[20] Rothman, *America's National Monuments*, xiii.

[21] Rothman, *America's National Monuments*, xiv.

[22] Meringolo, *Museums, Monuments, and National Parks*, 75.

[23] Meringolo, *Museums, Monuments, and National Parks*, 75.

historic sites. The agency created an NPS history program with the recognition that, according to Meringolo, history could be a "tool of development, enabling states in the South and Northeast to attract tourists."[24] The agency's historical properties were further expanded in 1933, when a reorganization of the National Park Service brought national monuments on War Department and Forest Service lands under the NPS's purview.[25]

The growth of the NPS history program and the historic preservation movement in the 1930s under the direction of Chief Historian Verne Chatelain further reinforced the agency's distinction between Native American history and American history. It deemed important Native American historical sites, like the Ancestral Puebloan cliff dwellings preserved at Mesa Verde National Park, to be archeological rather than historic. The NPS history program bypassed them completely because, as Meringolo notes, designating sites with Native American history as historic "would situate Native American sites as the equals of historic sites, raising the possibility that Native people should be located inside the American past and included in American identity, rather than separated from it in the artificial category of 'prehistory.'"[26] By situating these sites in "prehistory," the agency also obscured the continued presence of descendant Native American tribes, who were not consulted in these decisions. National monuments and historic sites created during this decade reveal what the agency deemed historic and worthy of preservation: George Washington Birthplace National Monument (1930), Colonial National Monument (1930), Morristown National Historical Park (1933), Salem Maritime National Historic Site (1938), and Hopewell Village National Historic Site (1938).

When the National Park Service created the Historic American Building Survey (HABS) in 1933 to document American architectural heritage, the survey did not include Native American construction. Native American structures did not fit into Western definitions of architecture, in which building plans and drawings were committed to paper by individual creators.[27] Congress passed the Historic Sites Act in 1935, which mandated that the NPS begin surveying historic and prehistoric places of "special significance" that were exemplary in telling the nation's history. The goal was to identify sites eligible to become part of the NPS system. The Historic Sites Act, unlike HABS, *did* include Native American cultural objects and buildings. Yet it continued to reinforce a distinction between the historic and the prehistoric/archeological by including Native artifacts, artwork, and construction as archeological resources, "outside the discourse of art and architecture."[28]

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[24] Meringolo, *Museums, Monuments, and National Parks*, 86.

[25] Lary M. Dilsaver, "National Significance: Representation of the West in the National Park System," in Gary J. Hausladen, ed., *Western Places, American Myths: How We Think about the West* (Reno and Las Vegas: University of Nevada Press, 2003), 114.

[26] Meringolo, *Museums, Monuments, and National Parks*, 138.

[27] Bousé, "Culture as Nature," 89.

[28] Bousé, "Culture as Nature," 89–94.

In this way, national parks and monuments that preserved and interpreted Native American history and culture remained distinct from the White, European American history interpreted at national historic sites. In a 1996 article for *The Public Historian* entitled "Culture as Nature: How Native American Cultural Antiquities Became Part of the Natural World," Derek Bousé argued that "The use of the word 'historic,' is crucial to reclaiming native histories from the realm of timeless nature." He stressed that the "continued use of the terms like "prehistoric" to designate Native Americans' cultural past perpetuates the tradition of excluding an entire group of Americans from *American* history."[29]

By mid-century, the NPS's roster of national historic sites included approximately 20 sites focused on westward expansion. These locations included places like Jefferson Expansion National Memorial, Fort Laramie, Fort Scott, Fort Union Trading Post, Bent's Old Fort, and Golden Spike. NPS historian Richard West Sellars called these "westward expansion parks" or, more scathingly, "Manifest Destiny sites." Sellars, a longtime NPS historian and Southwest Regional chief of historic preservation, architecture, and archeology from 1979–1988, recalled that, by the 1970s, there was a "sizeable group of Park Service historians intensely dedicated to the study of the army and the Indians in the American West." These historians (which he did not count himself a part of), such as future NPS Chief Historian Robert Utley (from 1964–1980), had an outsized impact on historical interpretation and preservation at these sites. "[M]any of them," he recalled, "spent their careers moving among westward expansion parks, where they often promoted cannon and rifle firing demonstrations, costumed interpretation and other forms of 'living history.'"[30] They also tended to support restoring or reconstructing historic buildings at these sites. At sites like Fort Laramie, these historians helped solidify an interpretive narrative focused on the lives of soldiers and their day-to-day existence at the forts. They steadfastly avoided contextualizing how they fit within the larger history of the American West, omitting discussion of the causes of the Indian Wars, the violent displacement and removal of Native Americans, and the long-term consequences these events have had on tribal communities.

Scholars including Sellars and political scientist Robert Pahre have observed that the interpretation of the American West that was developed at many NPS units in the first half of the last century remained stubbornly persistent well into this century.[31] Pahre provides a succinct summary of the favored narrative at many of these sites: "European Americans move across the Plains, interact with Native Americans in war and peace, conquer a

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[29] Bousé, "Culture as Nature," 91.

[30] Sellars, "War and Consequences."

[31] Robert Pahre, "Reconsidering National Park Interpretation of the Great Plains and Trans-Mississippi West," *Great Plains Research* (Fall 2012), 99–122.

wilderness, and build a nation."[32] Tribal communities were not involved in the development of these interpretive narratives—had they been, interpretation at these sites of Native American displacement and dispossession would have been dramatically different.

• • •

This brief survey of the early history of America's national parks, monuments, and historic sites illuminates how the National Park Service's preservation and interpretation shaped White Americans' understanding of Native American history and culture for nearly a century. The agency either wrote Native people out of the history of western national parks, relegated them to the nation's "prehistoric" past, or depicted them as an obstacle to be overcome in the triumphant history of westward expansion. The NPS did not invite indigenous communities to participate in the development of interpretation or museum exhibits about their own tribal histories. It was both a physical process of removal and an ideological project that has had lasting repercussions for contemporary Native communities, many of which remain very near or even living within national parks throughout the country.[33] Anthropologist and author David Treuer, an Ojibwe Indian from the Leech Lake Reservation in Minnesota, described contemporary tribal relationships with the national parks this way: "And yet we remain, and some of us have stayed stubbornly near the parks, preserving our attachment to them. . . . But while the parks may be near us, and of us, they are not ours."[34] For these and many more reasons, Native Americans remain wary of the NPS's intentions.

An Evolution in NPS-Tribal Relations, 1970s–Present

Native American activism in the 1960s and 1970s helped draw attention to the government's long history of usurping tribal lands, violating treaties and tribal sovereignty, and forcing Native assimilation. Assimilation efforts included forcible assimilation at Native American boarding schools and, in the 1950s, a devastating termination policy that sought to close

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[32] Pahre, "Reconsidering National Park Interpretation of the Great Plains and Trans-Mississippi West," 99–100.

[33] Examples of tribes who have remained close to parks include the Havasupai Indian Reservation within the borders of Grand Canyon National Park, the Timbisha Shoshone in Death Valley National Park, and the Kaibab Paiute Indian Reservation, which encloses Pipe Spring National Monument. This pattern is not limited to the Western national parks, however; one example is the Miccosukee tribe reservation located within Everglades National Park in Florida. See Chapter 10, "Everglades National Park and the Seminole Problem" in Robert H. Keller and Michael F. Turek, *American Indians and National Parks* (Tucson: University of Arizona Press, 1998), and David Treuer, "Return the National Parks to the Tribes," *The Atlantic*, May 2021, https://www.theatlantic.com/magazine/archive/2021/05/return-the-national-parks-to-the-tribes/618395.

[34] Treuer, "Return the National Parks to the Tribes."

reservations, disband tribal governments, and sell off Native land.[35] Native American groups including the American Indian Movement (AIM) led several protests and occupations targeting federal agencies and properties, including the occupation of Alcatraz Island from November 1969 to June 1971; the Trail of Broken Treaties demonstration from the West Coast to Washington, DC, in 1972; and the occupation of the Bureau of Indian Affairs headquarters in Washington, DC, in 1972. Activists also targeted National Park Service sites by occupying Mount Rushmore National Memorial in 1970 and threatening to burn Fort Laramie in 1973.[36] In 1976, the centennial year of the battle of Little Bighorn, members of the American Indian Movement turned their focus to Custer Battlefield National Monument (later renamed Little Bighorn Battlefield National Monument) in Montana.[37] AIM protesters gathered at the site's memorial to protest the centennial commemoration and the Anglo-American patriotic narrative that portrayed George Armstrong Custer and the Seventh Cavalry as heroic martyrs to the cause of Western expansion. Native Americans also held their own ceremonies to mark the centennial. The Lakota Treaty Council, for example, held a spiritual gathering on June 22–25, 1976, inviting Native Americans to "stand in unity to prove to the world that we have survived nearly 200 years of genocidal policies."[38] This tribal counterprogramming alongside the official NPS commemoration sought to elevate Native American perspectives that the agency had long ignored.

Collectively, Native American activism helped drive a shift in the federal government's policies toward indigenous communities in the final decades of the last century. The National Park Service was no exception. In a 2009 article for the *George Wright Forum*, Jacilee Wray, Alexa Roberts, Allison Peña, and Shirley J. Fiske outlined the major legislative and policy changes beginning in the late 1960s that collectively transformed NPS-tribal relationships.[39] The authors suggest that these changes began with the 1969 National Environmental Policy Act (NEPA) and the National Historic Preservation Act (1966), which required that federal agencies provide opportunities for public participation in decision-making. In 1978, Congress passed the American Indian Religious Freedom Act, which protected tribal access to and use of federal lands for religious purposes. In 1979, the Archaeological Resources Protection Act revisited the shortcomings of the 1906 Antiquities

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[35] National Park Service, "The Struggle for Sovereignty: American Indian Activism in the Nation's Capital, 1968–1978," https://www.nps.gov/articles/000/american-indian-activism.htm.

[36] Sellars, "War and Consequences."

[37] The site was renamed Little Bighorn Battlefield National Monument in 1991.

[38] Historian Edward Tabor Linenthal describes these events in great detail in his book *Sacred Ground: Americans and Their Battlefields*, 2nd ed. (Urbana and Chicago: University of Illinois Press, 1993), 144.

[39] Jacilee Wray, Alexa Roberts, Allison Peña, and Shirley J. Fiske, "Creating Policy for the National Park Service: Addressing Native Americans and Other Traditionally Associated Peoples," *George Wright Forum* 26, no. 3 (2009), 43. This section is deeply indebted to their detailed overview of the profound legislative and policy shifts within the NPS and the federal government during these decades.

Act and sought to further protect archeological resources on public and tribal lands.[40] These changes did not immediately transform NPS relationships with tribes; the NPS still generally did not seek tribal input about the preservation and interpretation of western NPS units. They did, however, create a legislative framework that would facilitate policy changes within the agency in the coming decades.

This body of federal legislation was accompanied by policy changes within the National Park Service. In 1981, the agency hired a chief ethnographer, Muriel Crespi, who was charged with completing the stalled NPS *Native American Relationships Management Policy* and creating an applied anthropology program for the agency. Wray, Roberts, Peña, and Fiske suggest that the NPS ethnography program, in particular, was critical to the development of agency-wide guidance for the implementation of NEPA, National Historic Preservation Act (NHPA), and American Indian Religious Freedom Act (AIRFA), as well as the 1980 Alaska National Interest Lands Conservation Act (ANILCA). They suggest that Crespi recognized "the need to make NPS more responsive to and aware of the broader range of human communities who place cultural significance on resources within national parks, beyond the conventional associations of famous individuals or military battles."[41] For this goal, she sought to (in her words) "institutionalize" ethnography within the agency—an effort that required both creating new procedures and policies to guide tribal relationships and hiring anthropologists who were stationed throughout the NPS system.[42]

The completion of the *Native American Relationships Management Policy* in 1987 was one of the most important developments in NPS-tribal relationships during this time period. The NPS had been working on the policy since 1978, but it took a full decade to come to fruition. (Historians Robert Keller and Michael F. Turek have noted that the same policies were first proposed in the 1930s by NPS chief historian Verne E. Chatelain—"an indication of how sluggishly the NPS could move on Indian matters."[43]) It directed NPS staff "to effectively recognize and consult with Native Americans who had connections to parklands"—something that had never been done before.[44] The new policy was codified in the NPS's *Management Policies* the following year. Wray, Roberts, Peña, and Fiske argue that "The decade following the release of the 1988 NPS *Management Policies* brought a sea-change with respect to recognition of American Indians and other traditional groups in park management decisions," with an emphasis on providing tribes with access to sacred

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[40] National Park Service, "Archaeological Resources Protection Act of 1979," https://www.nps.gov/subjects/archeology/archaeological-resources-protection-act.htm.

[41] Wray et al., "Creating Policy for the National Park Service," 44.

[42] Wray et al., "Creating Policy for the National Park Service," 45–46.

[43] Keller and Turek, *American Indians and National Parks*, 234.

[44] Wray et al., "Creating Policy for the National Park Service," 43.

places and incorporating the input of Native American and other traditionally associated people in NPS policymaking.[45] It prioritized consulting with people who retained historical, cultural, and spiritual connections to the national parks.

Tribes were justifiably wary of the motives of these new NPS anthropologists. Future Sand Creek Massacre National Historic Site superintendent Dr. Alexa Roberts was, at the time, the assistant director of the Navajo National Historic Preservation Department. Roberts sought to apply the 1987 *Native American Relationships Management Policy* in her work for the Navajo tribe; she regularly used those policies to advocate for Navajo land use rights and ensure their consultation on issues related to NPS units within or near the Navajo Nation.[46] Roberts recalled that the Navajo Nation and the NPS were in constant communication during this time period, and the tribe did not hesitate to call out the NPS's missteps:

> The Navajo Nation had a lot to say about how the park service should be doing things better, or at least differently. We wrote articles and gave presentations about federal agencies' seeming inability to consult in the context of undertakings subject to compliance with NHPA, to incorporate consultation into proactive planning processes, to develop systematic means of consultation through the use of agreement documents and tribal advisory committees, and to devote the financial resources necessary to conduct meaningful consultation. We commented on park planning documents and policies generated from regional and Washington offices. I wrote more than my share of vehement letters to park superintendents, the regional director, and Washington. Altogether, it must have seemed that the Navajo Nation didn't approve of much of anything the National Park Service did.[47]

Roberts's example underscores the reality that, although the policy marked a definite improvement, the agency's progress in tribal consultation remained slow and unsatisfying to tribal communities.

The 1990s were another pivotal decade in improving relationships between the federal government and tribal communities. In November 1990, Congress passed the Native American Graves Protection and Repatriation Act (NAGPRA). This civil rights legislation created a legal pathway for Native Americans/Alaskan Natives/Native Hawaiians to reclaim ancestors, unassociated funerary objects, sacred objects, and objects of cultural patrimony from the holdings of federal agencies and museums and other institutions receiving federal funding and repatriate them back to their source communities.

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[45] Wray et al., "Creating Policy for the National Park Service," 46.

[46] These sites include Wupatki National Monument, Canyon de Chelly, Hubbell Trading Post, Grand Canyon, and many others.

[47] Alexa Roberts, "Tribal Consultation in the National Park Service: A Personal Perspective," in Nina Swidler, Kurt Dongoske, Roger Anyon, and Alan Downer, eds., *Native Americans and Archeologists: Stepping Stones to Common Ground* (Walnut Creek, CA: AltaMira Press, 1997), 229. Cited in Allison Peña, Alexa Roberts, and Jacilee Wray, "Connecting National Parks to the People and People to National Parks: Muriel Crespi's Contribution to the Policies and Practices," *Practicing Anthropology* 26, no. 1 (Winter 2004), 19.

That same year, the NPS released a report, "Keepers of the Treasures: Protecting Historic Properties and Cultural Traditions on Indian Lands," in response to a congressional directive to research and report on the funding needs to manage, research, interpret, and protect historic properties and cultural resources on tribal lands.[48] The report drove the creation of the NPS Tribal Historic Preservation Program, preservation grant funding programs, and the designation of Tribal Historic Preservation Offices (THPOs). THPOs are designated by tribes and function much like state historic preservation offices; their coordinators work to assist tribal communities in preserving historic properties and cultural traditions, and advise on management of tribal historic properties and Section 106 reviews.[49] In 1992, the National Historic Preservation Act was amended to recognize the role of Indian tribes and Native Hawaiian organizations in the Section 106 review process.[50] In 1994, President Bill Clinton held a meeting at the White House with leaders of more than 500 tribal governments to discuss federal tribal policy. He signed a directive requiring federal departments and agencies—including the NPS—to work with federally recognized tribal governments on a government-to-government basis and to consult with tribal governments when federal actions will impact tribal lands and resources.[51]

In the 1980s and 1990s, the impacts of this tribal activism and legislative change were strikingly evident at Custer Battlefield National Monument in Montana. The 1976 American Indian Movement protests pushed the NPS to make improvements to the site's brochures and interpretive programs. They began updating museum exhibits in consultation with tribes—something the site had never done before.[52] In 1988, on the 112th anniversary of the battle, Russell Means and AIM returned to the national monument to protest the site's lack of a Native American memorial. The protesters placed a plaque honoring Native Americans on the burial site for the Seventh Cavalry's enlisted men. The NPS removed the plaque but placed it in the visitor center with interpretive text to explain its

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[48] National Park Service, "Keepers of the Treasures: Protecting Historic Properties and Cultural Traditions on Indian Lands – A Report on Tribal Preservation Funding Needs Submitted to Congress by the National Park Service, United States Department of the Interior," May 1990, i, https://www.nps.gov/subjects/tellingallamericansstories/upload/Keepers.pdf.

[49] See "Tribal Historic Preservation Office Program," https://www.nps.gov/subjects/historicpreservationfund/tribal-historic-preservation-office-program.htm and "Tribal Historic Preservation Office (THPO) Grants," https://www.nps.gov/subjects/historicpreservationfund/thpo-grants.htm.

[50] See "Agency Section 106 Agreements with Indian Tribes and Native Hawaiian Organizations," Advisory Council on Historic Preservation, https://www.achp.gov/digital-library-section-106-landing/agency-section-106-agreements-indian-tribes-and-native-hawaiian#:~:text=The%201992%20amendments%20to%20the,in%20the%20national%20preservation%20program.

[51] William J. Clinton, "Memorandum on Government-to-Government Relations With Native American Tribal Governments," April 29, 1994, https://www.transportation.gov/sites/dot.gov/files/docs/Govt%20to%20Govt%20Relations%20w%20Native%20Am%20Tribal%20Govts.pdf. See also Jeanette Wolfley, "Reclaiming a Presence in Ancestral Lands: The Return of Native Peoples to the National Parks," *Natural Resources Journal* 56, no. 1 (Winter 2016), 63.

[52] Edward Tabor Linenthal, "Committing History in Public," *The Journal of American History* 81, no. 3 (December 1994), 987.

meaning.[53] In November 1991, Congress approved a bill renaming the site Little Bighorn Battlefield National Monument. The bill also approved the establishment of a memorial to Native American participants in the battle. President George H.W. Bush signed the bill into law on December 10, 1991. The Little Bighorn Battlefield National Monument Advisory Committee, made up of tribal members, historians, artists, and landscape architects, launched a national design competition for the memorial. The new memorial was dedicated in 2003, and final wording for the memorial was established in 2013.[54]

Driven by tribal activism, new federal and NPS policies set the stage for a dramatic shift in how the NPS worked with tribal communities in the current century. Combined with new developments in historical scholarship about the American West, these policies positioned the agency to begin reimagining stale narratives about Western history that showed an increased sensitivity to tribal history and Native perspectives.

Rethinking the History of the American West and the Civil War

At the same time that the National Park Service was creating new policies to guide its relationships with Native American tribes, a small group of historians of the American West began rethinking long-held assumptions about American frontier history. The so-called "New Western History" that emerged in the 1980s was led by historians including William Cronon, Patricia Limerick, Richard White, and Donald Worster.[55] These historians began the work of unraveling Frederick Jackson Turner's influential and long-lasting "frontier thesis" (1893) of American history. Turner suggested that "The existence of an area of free land [in the West], its continuous recession, and the advance of American settlement westward, explain American development." His thesis offered a triumphal story of American progress, with the migration of settlers to and development of the West as critical to shaping American political institutions and American culture. Notably for the

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[53] Linenthal, "Committing History in Public," 987.

[54] National Park Service, Little Bighorn Battlefield National Monument, Montana, "Indian Memorial," https://www.nps.gov/libi/learn/historyculture/indian-memorial.htm.

[55] Key texts included Patricia Nelson Limerick, *The Legacy of Conquest: The Unbroken Past of the American West* (New York: W.W. Norton, 1987); Patricia Nelson Limerick, Clyde A. Milner II, and Charles Rankin, eds., *Trails: Toward a New Western History* (Lawrence: University Press of Kansas, 1991); and Richard White, *"It's Your Misfortune and None of My Own": A New History of the American West* (Norman, OK: University of Oklahoma Press, 1991).

purposes of this essay, Turner also described the West as "free land," and settler expansion as a process of "winning a wilderness."[56] The Western landscape was neither free land nor wilderness.

It took almost a century for historians to begin loosening the hold of Turner's frontier thesis in both American culture and in historical scholarship about the West. The new Western historians placed conquest at the center of Western history and centered the experiences of Native Americans, racial minorities, women, and the poor in their scholarship. They underscored the tremendous human and environmental costs of westward expansion and conquest.[57]

Beginning in the early 2000s, another group of historians began to reorient the traditional North-South focus of Civil War history. Historian Stacey L. Smith has observed that the New Western History's focus on conquest, oppression, and resistance to the federal government "paved the way" for these historians to reinterpret "the Civil War as a multi-front struggle among multiple, competing sovereignties across the continent."[58] By considering how the West fit into the history of the American Civil War, historians revealed a much larger story about rebellions against the growth and centralized power of the federal government by Native Americans, settlers, former Mexican citizens, Mormons, state governments, and others. From this perspective, it becomes clear that these rebellions were all a piece of "a broader national effort to solidify the territorial sovereignty of the United States and impose a particular vision of liberal citizenship and free labor market relations on diverse, resistant peoples, North, South, and West."[59] One of the key texts in this body of scholarship is Ari Kelman's *A Misplaced Massacre: Struggling over the Memory of Sand Creek* (2013), which examines the history and memory of the 1864 Sand Creek Massacre and the development of Sand Creek Massacre National Historic Site.[60] Kelman's work renewed scholarly attention to the history of the massacre and its relationship to the Civil War and westward expansion.

Even as historians continue to develop an increasingly complex and critical picture of westward expansion, many NPS sites have been slow to update their interpretation of Native American history and culture. Progress has been inconsistent, and the legacies of mid-century NPS decisions about history, archeology, and interpretation are still in

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[56] Frederick Jackson Turner, "The Significance of the Frontier in American History," paper delivered to the American Historical Association Meeting in Chicago, July 12, 1893, https://nationalhumanitiescenter.org/pds/gilded/empire/text1/turner.pdf.

[57] Nathalie Massip, "When Western History Tried to Reinvent Itself: Revisionism, Controversy, and the Reception of the New Western History," *The Western Historical Quarterly* 52 (Spring 2021): 59–85.

[58] Stacey L. Smith, "Beyond North and South: Putting the West in the Civil War and Reconstruction," *Journal of the Civil War Era* 6, no. 4 (December 2016), 571.

[59] Smith, "Beyond North and South," 567–568.

[60] Ari Kelman, *A Misplaced Massacre: Struggling over the Memory of Sand Creek* (Cambridge, MA: Harvard University Press, 2013).

evidence today. The agency continues to grapple with the legacy of its division between archeological and historical sites. Southwestern archeological sites still tend to reinforce the placement of Native American history and culture outside of American history, and there are still very few non-archeological NPS sites that center Native American history and culture.[61]

In terms of interpretation, Richard West Sellars observed that Fort Laramie National Historic Site's interpretation in 2011 remained much the same as it had been early in his NPS career in the 1970s: "[T]he National Park Service has played the role of an 'Artful Dodger' at the fort, a court historian skewing the story to avoid history's darker aspects," he wrote.[62] Historians Kelman and Sellars have observed that, until very recently, the NPS continued to describe the Plains Wars as a "clash of cultures," rather than assigning responsibility to the federal government for its violent subjugation of Native Americans in the West.[63] In fact, there are individual NPS units that continue to cling to the "Clash of Cultures" language. Despite the interpretive improvements at Little Bighorn Battlefield National Monument in the 1980s and 1990s, in 2023 the park's website still used the phrase in its brief history of the battle—and did so boldly, making the phrase the first subtitle that leads the essay.[64] Similarly, Washita Battlefield National Historic Site includes a "Clash of Cultures" lesson plan as one of the site's online educational resources.[65]

These examples underscore a persistent problem for the agency. Because of the decentralized nature of NPS interpretation and the agency's limited resources to revise outdated interpretation, improvements are often park-dependent rather than agency-wide. The Little Bighorn example is also an important reminder that what looked like tremendous interpretive progress for the NPS in the 1980s and 1990s looks insensitive, uncritical, and outdated in 2023.

Interviews with Native American employees of the National Park Service underscore how persistent the "manifest destiny" narrative is at some western national parks, and how some longtime NPS staff members have resisted updating this interpretation. In a 2020 interview with *Smithsonian Magazine*, W. Otis Halfmoon, a member of the Nez Perce tribe, recalled the challenges he faced in trying to interpret Native American history at

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61 Dilsaver, "National Significance," 118.

62 Richard West Sellars, "War and Consequences: The American Indian Movement vs. the National Park Service at Fort Laramie, Part II," *National Parks Traveler,* April 2011, http://npshistory.com/publications/sellars/npt-2.pdf.

63 Sellars, "War and Consequences," and Kelman, *A Misplaced Massacre*, 5. See, for example, the 2002 "Clash of Cultures Trails Project," http://www.npshistory.com/publications/nhl/theme-studies/clash-of-cultures.pdf.

64 National Park Service, Little Bighorn Battlefield National Monument, Montana, "Context and Story of the Battle," https://www.nps.gov/libi/learn/historyculture/battle-story.htm.

65 National Park Service, Washita Battlefield National Historic Site, Oklahoma, "Traveling Trunk Lesson Plan 4: Clash of Cultures," https://www.nps.gov/waba/learn/education/traveling-trunk-lesson-plan-4-clash-of-cultures.htm.

some Western NPS units.[66] He was turned down for a position as an interpreter at Nez Perce National Historic Park in the 1970s because he did not study Native American history of literature in college. He recalled, "I was shocked. When I went to college, I wanted to learn more about the White People. I already knew how to be an Indian!" In 1990 he was hired as an interpreter at Big Hole National Battlefield, and in subsequent years worked as an interpreter at Big Horn Canyon National Recreation Area, then as the first unit manager of Bear Paw Battlefield, and then tribal liaison for the Lewis and Clark National Historical Trail. Halfmoon recalled:

> Through the years, it has been Anglo ethnographers, anthropologists, etcetera, telling our stories. I realized that's what I was doing all along: telling our side of the stories.
>
> This concept was so easy to understand, it is amazing how much pushback I received from some of the older Anglo individuals within the Park Service, the Old Bulls. . . . Some of those Old Bulls said I was an AIMster—a member of the American Indian Movement—but I knew it was time for a change.

Halfmoon told the interviewer that one of the biggest challenges he faced "was getting the Park Service to say that almost all its sites have a tribal story. These stories should be told, the good and the bad. . . . My argument to the superintendents was that the sites had rich stories; including the tribal stories would make them even richer."[67]

Similarly, NPS Park Ranger Roger Amerman of the Choctaw Nation of Oklahoma told the interviewer that "the National Park Service often told stories strongly anchored in the perceptions and experiences of colonial peoples and their descendants. . . . [T]he Native American or minority story was until recent history usually diminished to be a backstory to the grander colonial narrative." This has begun to change, he suggested, but the "new story is still told by Park Service employees who are colonial descendants—not deeply involved in Native American culture, perhaps not motivated to engage the Native story to the same degree, and challenged to convey a thorough and accurate Native perspective."[68] The perspectives of NPS interpreters and rangers like Halfmoon and Amerman reveal how stubbornly the NPS's narratives of western history from the previous century have remained at national parks, well into this century.

Although change has been slow within the NPS, there have been important developments in recent years. Several new NPS units have sought to tackle more diverse subjects and difficult episodes in American history. These sites explicitly cut against the celebratory, uncritical nationalism that has long been implicit—and often explicit—at national parks.

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[66] Dennis Zotigh, "How Native Americans Bring Depth of Understanding to the Nation's National Parks," *Smithsonian Magazine*, August 25, 2020, https://www.smithsonianmag.com/blogs/national-museum-american-indian/2020/08/25/natives-interpreting-national-parks.

[67] Zotigh, "How Native Americans Bring Depth of Understanding to the Nation's National Parks."

[68] Zotigh, "How Native Americans Bring Depth of Understanding to the Nation's National Parks."

There are sites examining topics including Japanese internment in World War II, African American and civil rights history, Native American history, and LGBTQ history. Examples of these sites include Manzanar National Historic Site (1992), Washita Battlefield National Historic Site (1996), Minidoka Internment National Monument (2001), Sand Creek Massacre National Historic Site (2007), and more recently, Stonewall National Monument (2016), Medgar and Myrlie Evers Home National Monument (2020), and Amache National Historic Site (2022).

Political Scientist Robert Pahre has observed that NPS sites that "lack legacy effects" are more likely to present "fresh approaches" to "non-Anglo stories."[69] In other words, these new park units are less constrained by long-held (almost fossilized) interpretive perspectives and longtime staff and community members who are resistant to changing them. Pahre singles out Washita Battlefield in Oklahoma and Sand Creek Massacre National Historic Site as two places where the NPS has succeeded in bringing fresh interpretation to old questions about the American west. The first decade of Sand Creek Massacre National Historic Site's operation suggests that he is right. The NPS, working in close partnership with the Cheyenne and Arapaho tribes, have accomplished something that would have been unheard of in an earlier NPS era.

Conclusion: Putting Sand Creek in Context

Sand Creek Massacre National Historic Site has been shaped by this long history of the National Park Service and its relationship with Native American tribes. In his influential, Bancroft Prize-winning 2013 book *A Misplaced Massacre*, historian Ari Kelman examined the challenges the NPS faced in creating the new historic site.[70] Rather than revisit Kelman's scholarship here (which readers are strongly encouraged to consult), these concluding paragraphs focus specifically on how the long history of NPS-tribal relationships shaped the establishment and early management of the historic site.

The Sand Creek Massacre National Historic Site Establishment Act of 2000 reflects how dramatically historical understanding of and federal policies toward Native American tribes have changed from the 1970s to the present. First and foremost, by putting the word "massacre" in the site's name and describing the massacre's events in detail, the legislation dispatched with any efforts to sanitize the violence perpetuated against the Cheyenne and Arapaho people by the federal government. The Act also prioritized tribal participation and descendants' rights in the creation of the park, requiring that the government "provide

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[69] Pahre, "Reconsidering National Park Interpretation of the Great Plains and Trans-Mississippi West," 100.

[70] Readers are encouraged to consult Kelman's book, *A Misplaced Massacre*.

opportunities for the tribes and the State to be involved in the formulation of general management plans and educational programs for the national historic site."[71] It stipulated that the NPS consult with and seek advice from the tribes regarding the site's development, and included provisions for NPS consultation with tribal representatives.

Sections 8 and 9 of the legislation, in particular, reveal the dramatic change in NPS policy since the 1978 American Indian Religious Freedom Act protected tribal access to and use of federal lands for religious purposes. Section 8 is devoted to the "needs of descendants"—including access to the site, space for commemorative activities, and the right for them to carry out "traditional, cultural, or historical observance[s]" at the site. Section 9 stipulates that portion of the site be devoted to creating a space for the interment or reinterment of items associated with the Sand Creek Massacre repatriated under the Native American Graves Protection and Repatriation Act (NAGPRA).[72] The enabling legislation sought to ensure that the NPS would work closely with the Cheyenne and Arapaho tribes to develop the site, consider their needs in park planning, and respect their connections to and uses of the massacre site. These provisions were made possible by both the federal policy changes in the final decades of last century, and the development of an NPS ethnography program that sought to prioritize the needs of descendants and associated tribal communities.

Sand Creek Massacre National Historic Site's first superintendent, Alexa Roberts, recalled that she and Park Operations Manager Karl Zimmermann took these legislative mandates seriously. They worked hard to build trust with tribal partners in the site's early years. They "tried to work diligently with the tribes from the formal tribal representatives to the tribal members as a whole," Roberts said, "to figure out what they wanted and how we as a National Park and Park Service unit could meet those goals." They also recognized the singularity of the site: "we respected the significance of Sand Creek, not just the topic, the meaning to them—I mean, this wasn't like any other park unit, Roberts said."[73] Zimmermann also observed the many reasons that the tribes had *not* to trust the NPS: "Well, Sand Creek happened between the United States government and the Cheyennes. And then 150 years later, the federal government comes to the Cheyennes and says, 'we're here, trust us, and we're going to take over your land again, but we're going to do it different, trust us.'"[74] Tribal members interviewed by the Denver Service Center for Part II of the

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[71] *Sand Creek Massacre National Historic Site Establishment Act of 2000,* Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023, https://www.congress.gov/bill/106th-congress/senate-bill/2950/text.

[72] *Sand Creek Massacre National Historic Site Establishment Act of 2000,* Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023, https://www.congress.gov/bill/106th-congress/senate-bill/2950/text.

[73] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[74] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18-19, 2021.

site's administrative history (covering the years 2007–2017) told interviewers that they appreciated park leadership's efforts. Henry Little Bird Sr., a descendant of Sand Creek Massacre victim Tom White Shirt, told interviewers,

> They allowed us to make decisions there. They allowed us to . . . have more say so than any other place we dealt with. The National Park Service, they were really supportive. They gave us everything that they possibly could give to the Cheyenne and Arapaho. They take care of the grounds there and that's really good. We've been out there working with them when they do their surveying for little metal detector stuff—for artifacts. They've traveled with us to every symposium . . . what made it so unique was that they were always on our side. They were—if we were in meetings and stuff they were really supportive— . . . they made a path for the Cheyenne and Arapahos to express their self and to feel better about the Sand Creek.[75]

NPS staff's overriding sensitivity to the needs of descendant communities and the strong trust they developed with them would have been unimaginable in the NPS only a few decades earlier.

Finally, Sand Creek Massacre National Historic Site is one of only a few NPS sites that center (non-archeological/pre-contact) Native American history in their interpretation. The historic site makes vivid the complicity of the federal government in the tragic violence and murder of Cheyenne and Arapaho people at Sand Creek. Drawing on more recent scholarship about the American West, it draws direct connections between the Civil War, Westward expansion and conquest, and state-sponsored violence.

The Sand Creek Massacre occurred in November 1864, only a few short months after the federal government granted land to the state of California to preserve the Yosemite Valley and Mariposa Grove. This parallel timeline serves as a reminder that state-sponsored violence against Native people and state-sponsored land preservation were two parts of the same historical process that expanded federal control over the American West. Sand Creek Massacre National Historic Site has been at the forefront of the National Park Service's efforts to complicate long-standing narratives that have sanitized the history of the American West and erased the history of Native American tribes—a process that the agency itself was complicit in.[76]

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[75] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

[76] An important edited volume about NPS-tribal relationships was published right as this report went into final production. Readers are encouraged to consult Christina Gish Hill, Matthew J. Hill, and Brooke Neely, eds., National Parks, *Native Sovereignty: Experiments in Collaboration* (Norman, OK: University of Oklahoma Press, 2024).

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Sand Creek Massacre National Historic Site

Administrative History, Volume II

2007–2017

Denver Service Center, National Park Service

Introduction

Purpose of Administrative History Volume II

The purpose of the *Sand Creek Massacre National Historic Site Administrative History Volume II* is to provide an account of the origin and evolution of the site's management, programs, challenges, and decisions in its first decade (January 1, 2007, through December 31, 2017). This volume of the administrative history will contextualize these first 10 years of site operations and provide an easy starting point and reference for site staff. It will also provide an entry point for future authors writing additional installments of the site's administrative history.

National Park administrative histories are important because they explain how a unit of the national park system originated, was established, and has been administered over time. They focus on the history of a park as a unit of the national park system and include the history and management of each unit's programs and activities. Administrative histories provide valuable context for current and future site managers—the primary audience—to understand the decisions made by their predecessors in the face of past challenges and controversies. By having this historic management context, understanding how past decisions were made, and understanding how practices and policies evolved over time, site managers will be able to better prepare for and respond to future challenges.[1] Because of their high importance, National Park unit administrative histories are one of several baseline documents required for each National Park unit under Director's Order 28 *Cultural Resource Management Guidelines*.[2]

Relationship to Administrative History Volume I

The 106th Congress passed *The Sand Creek Massacre National Historic Site Establishment Act of 2000* on November 7, 2000. This act did not establish the national historic site but rather authorized its establishment contingent on adequate land acquisition—a process that took several more years.[3] The site was formally established on April 27, 2007, and

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1 National Park Service, *National Park Service Administrative History: A Guide*, 2004, https://www.nps.gov/parkhistory/hisnps/NPSHistory/guide.pdf, 4.

2 National Park Service, *Director's Order #28: Cultural Resource Management*, 1998, https://www.nps.gov/goga/learn/management/upload/-1942-NPS-1998-DO28-Cultural-Resource-1998.pdf, 26.

3 Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023, https://www.congress.gov/bill/106th-congress/senate-bill/2950/text.

dedicated on April 28th. It opened to the public part time in May of that year.[4] This administrative history spans the 10-year period from January 2007 through December 2017, encompassing slightly more than the period from the site's dedication to the finalization of the site's *Foundation Document*.

The history of the Sand Creek massacre and the people and events leading to the designation and establishment of the site prior to January 2007 can be found, in part, in Ari Kelman's *Remembering Sand Creek: An Administrative History* (2016), which is in draft form. Kelman's research formed the basis of his Bancroft Prize-winning 2013 book, *Misplaced Massacre: Struggling over the Memory of Sand Creek*.[5] Kelman's work takes a close look at the controversy surrounding the location of the massacre site, the importance of the site to Cheyenne and Arapaho people, the advocacy of massacre descendants and tribal elders to establish the site, and challenges leading up to the formal dedication and opening of the site.[6] Because of the scope of Kelman's work, this volume will not cover the same material in detail.

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[4] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, http://npshistory.com/publications/foundation-documents/sand-fd-2017.pdf, 4; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 8.

[5] Ari Kelman, *A Misplaced Massacre: Struggling over the Memory of Sand Creek* (Cambridge, MA: Harvard University Press, 2013).

[6] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History,* by Ari Kelman. Draft, 2016, 1–19. The digital project files (including Kelman's draft) for this administrative history were organized in a collaborative Microsoft SharePoint group by Sand Creek Massacre National Historic Site (SAND) and Denver Service Center (DSC) staff. The NPS has catalogued and preserved these SharePoint files at Sand Creek Massacre National Historic Site so that future researchers can access them. These project files include park reports, electronic records, oral history transcripts, administrative history drafts, and the Denver Service Center's research files. Hereafter, documents located in these SharePoint files are cited in the text as "SAND Electronic Records."

The project team would additionally like to acknowledge the contributions that Joe Big Medicine (Southern Cheyenne, Cheyenne and Arapaho Tribes, Oklahoma) made to Sand Creek Massacre National Historic Site.

Document Organization

Since each NPS unit is unique, there is no formula or template for how an administrative history should be organized. In general, administrative histories should be thorough and comprehensive and cover the most significant aspects of the NPS unit from its establishment to the present.[7] This document represents the second volume to the site's administrative history and therefore does not need to retell aspects covered in Volume I.

The study team, in consultation with site managers, identified the following chapter headings as important themes and topics to be addressed.

Chapter One: **Background**. This chapter briefly introduces the massacre of Cheyenne and Arapaho people by soldiers of the 1st and 3rd Regiments, Colorado Volunteer US Cavalry, at Sand Creek in 1864. It provides a short orientation to the Sand Creek Massacre National Historic Site, including a description of the site's significance, legislative history, and development and provides some necessary context from the first volume of the administrative history. This chapter also briefly discusses previous research efforts related to the establishment of the site and early planning efforts that guided the management of the site. These brief background topics provide important context about the site's management, relationship with tribes, development, and focus areas for resource protection, education, and visitor experience.

Chapter Two: **Management and Site Programs**. This chapter dives deeper into site managers' interpretation of the enabling legislation, research, partnerships, and actions taken prior to the opening of the site. It also discusses the administrative relationship between Sand Creek Massacre NHS and other NPS units as well as the development of site policies and planning documents. Significant space is given to discussing the planning documents developed during the period covered in this volume, which set the vision for both short-term and long-term site operations at the site. Finally, Chapter Two includes a discussion of site development (including administrative spaces, visitor services, infrastructure, and building rehabilitation) as well as justification for these development actions. Much of the material referenced prior to 2007 is important to understand the context of management actions.

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[7] National Park Service, *National Park Service Administrative History: A Guide*, 2004, https://www.nps.gov/parkhistory/hisnps/NPSHistory/guide.pdf, 5–6.

Chapter Three: **Relationship with Tribes**. This chapter examines relevant sections of the enabling legislation concerning descendant and tribal access and rights and how site managers interpreted and implemented those sections. Tribal consultation at the site is defined and discussed as well as the tribal liaison program at the site, further emphasizing the uniqueness of the tribes' and NPS's relationship to make management decisions. It also examines the creation of the site's repatriation area as well as repatriation protocols and events.

Chapter Four: **Partnerships**. This chapter discusses partnerships that site managers established for resource management, tribal access, and visitor use in the site's first decade, with a special emphasis on partnerships with the government of the State of Colorado, the Kiowa County Government, and the United Methodist Church. It also considers other administrative commitments, including the relationship with the Western National Parks Association (WNPA), a nonprofit cooperating association that operates a bookstore in Eads at the Sand Creek Massacre Historic Site Visitor and Education Center, and in the visitor contact station at the historic site.

Chapter Five: **Anniversaries and Commemoration**. This chapter covers the major anniversary and commemorative events that took place at the site during the decade covered in this volume. These events include the site dedication and opening, the 150th commemoration in 2014, and other recurring special events such as the Spiritual Healing Run.

Chapter Six: **Interpretation**. This chapter explores the development of interpretive themes and language used at the site in talks, brochures, waysides, and other interpretive media. Loci of interpretation are also discussed as they relate to visitor experience, education, and site development.

Chapter Seven: **Visitor Use and Management**. This chapter examines management decisions surrounding visitation and public access including developing the open/closed site schedule and visitor use areas. The chapter also synthesizes visitation information to discuss trends in visitation since the site's opening in 2007 and discusses the main types of visitor use at the.

Chapter Eight: **Integrated Resource Management.** This chapter provides a discussion on the cultural and natural resource management at the site, including the connection between these types of resources and the Cheyenne and Arapaho worldview. As cultural and natural resources are intimately connected at the site, so too are tribal concerns for these resources. This has required the NPS to maintain close relationships and consultation with tribal representatives to manage these integrated resources.

Appendices include interpretive themes developed from 2007 to 2017 and copies of relevant Sand Creek Massacre NHS legislation and administrative commitments.

CHAPTER ONE

Background

This chapter briefly introduces the massacre of Cheyenne and Arapaho people by the US Army that occurred at Sand Creek in 1864 and provides a short orientation to the Sand Creek Massacre National Historic Site. This orientation includes a description of the site's significance, legislative history, and development. This chapter also discusses previous research efforts related to the establishment of the site and the early planning efforts that guided the management of the site. These brief background topics contribute to understanding the site's management, relationship with tribes, development, and focus areas for resource protection, education, and visitor experience.

Brief Summary of the Sand Creek Massacre (1864)

The Sand Creek Massacre National Historic Site commemorates the November 29, 1864, attack by US soldiers on a village of about 700 Cheyenne and Arapaho people along Sand Creek (Big Sandy Creek and Sand Creek are used here synonymously) in southeastern Colorado Territory, about 170 miles southeast of Denver. At dawn, Colonel John M. Chivington led approximately 675 soldiers of the 1st and 3rd Regiments, Colorado Volunteer (US) Cavalry, in an unprovoked surprise attack on a peaceful camp using small arms and howitzer fire to kill as many Cheyenne and Arapaho as possible. While many managed to escape the initial onslaught, others—particularly noncombatant women, children, and elderly people—fled into and up the dry creek channel. The soldiers followed, shooting them. Some of the fleeing people frantically dug pits and trenches along the streambed to escape the soldiers' bullets while others fought back with whatever weapons they had managed to retrieve from camp. At several places, soldiers shot from opposite sides of Sand Creek in a crossfire, using howitzers to drive the Cheyenne and Arapaho from their makeshift defenses. Over the course of 7 hours, the soldiers killed more than 230 Cheyenne and Arapaho, including 13 Cheyenne peace chiefs and 1 Arapaho chief. The loss of such leaders disrupted the tribes' traditional forms of governance for generations. During the afternoon and the following day, the soldiers committed atrocities on the dead, including taking human body parts as trophies. The soldiers departed the massacre site on December 1st with 600 captured horses.[1]

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[1] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 4.

The background to the Sand Creek Massacre lay in a whirlwind of events and issues triggered by the ongoing Civil War in the east and west, overreactions by White settlers and federal troops to the 1862–1863 Dakota uprising in Minnesota, the constant undercurrent of threatened Confederate incursions, the political and financial ambitions of Territorial Governor John Evans, and the substantial involvement of the Methodist Church in politics and the military in Colorado Territory. Perhaps most importantly, the causes of the Sand Creek Massacre lay in the irresistible momentum of Manifest Destiny—the Euro-American belief in its right to establish dominance over the lands between the Mississippi River and the Pacific coast.[2] The Sand Creek Massacre is one of the most emotionally charged and controversial events in US history, and the site's purpose is "to protect and preserve the landscape of the massacre site and interpret the associated cultural values to enhance public understanding of the massacre and assist in minimizing the chances of similar incidents in the future."[3]

Figure 1: The entrance to Sand Creek Massacre National Historic Site.
Photo by Tom Gibney, May 2021.

[2] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 4.

[3] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 5.

Brief Introduction to the Sand Creek Massacre National Historic Site

Sand Creek Massacre National Historic Site is located about 170 miles southeast of Denver and 23 miles east-northeast of Eads, the Kiowa County seat, at the intersection of Chief White Antelope Way (County Road 54) and County Road "W."[4] The Kiowa County Commission voted in 2010 to rename County Road 54 to Chief White Antelope Way to honor one of the Cheyenne peace chiefs killed during the massacre.[5] The site is situated on the grassland plains of southeast Colorado and remains largely undeveloped. Site managers have worked to restore the landscape as closely as possible to its appearance in 1864. During the time period examined in this study, the national historic site was comprised of 3,025 acres of land, 1,465 of which are held in trust by the United States for the Cheyenne and Arapaho Tribes and managed by the National Park Service.[6]

The site lies within the High Plains section of the Great Plains-Palouse Dry Steppe Province ecoregion and has gently rolling topography with elevations approximately 3,960 feet above sea level along Big Sandy Creek (Sand Creek). Bluffs and slopes are at slightly higher elevations. The Sand Creek floodplain is terraced, but mostly level to gently sloping and varies from a quarter to a half mile in width through the site.[7] The site offers a visitor use area and a visitor contact station with a bookstore. The Monument Hill area includes an overlook above Big Sandy Creek, a shade structure, and a repatriation area. The repatriation area is the location where human remains and cultural objects, which have been returned to the Cheyenne and Arapaho Tribes under the Native American Graves Protection and Repatriation Act (NAGPRA), are buried. A primitive walking trail continues to the northwest along the bluff beyond the Monument Hill overlook, with views of the creek bed, and follows the course of the massacre as tribal members fled along the creek

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4 National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 8, https://parkplanning.nps.gov/projectHome.cfm?ProjectID=19263; Pamela Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site, Eads, Colorado* (Centennial, CO: University of Colorado at Denver, 2001), i; and "Frequently Asked Questions," Sand Creek Massacre National Historic Site, last modified March 2020, https://www.nps.gov/sand/planyourvisit/faq.htm.

5 Kiowa County Commissioners Meeting Minutes, September 29, 2010, 684. On file with Kiowa County.

6 National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 4. In 2022, the Department of the Interior more than double the site's acreage with funds from the Land and Water Conservation Fund (LWCF), purchasing an additional 3,478 acres from a private landowner. See Department of the Interior, "Secretary Haaland Commits to Telling America's Story at Sand Creek Massacre National Historic Site," press release, October 5, 2022, https://www.doi.gov/pressreleases/secretary-haaland-commits-telling-americas-story-sand-creek-massacre-national-historic.

7 Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7–3.

with soldiers in pursuit. Interpretive wayside exhibits provide visitors with information about the massacre. Visitor information is also provided by a ranger-led interpretive program, a site brochure, site bulletins, and other printed material.[8]

Authorizing Legislation

The authorizing legislation from 2000 recognized the national and tribal importance of the Sand Creek Massacre and authorized the establishment of a national historic site contingent on adequate land acquisition.[9] Once the land was acquired, the act required the Secretary of the Interior through the National Park Service (NPS):

(1) to protect and preserve the site, including—

(A) the topographic features that the Secretary determines are important to the site;

(B) artifacts and other physical remains of the Sand Creek Massacre; and

(C) the cultural landscape of the site, in a manner that preserves, as closely as practicable, the cultural landscape of the site as it appeared at the time of the Sand Creek Massacre;

(2) (A) to interpret the natural and cultural resource values associated with the site; and

(B) provide for public understanding and appreciation of, and preserve for future generations, those values; and

(3) to memorialize, commemorate, and provide information to visitors to the site to—

(A) enhance cultural understanding about the site; and

(B) assist in minimizing the chances of similar incidents in the future.[10]

The legislation furthermore states that the site shall consist of approximately 12,480 acres as depicted on the Sand Creek Massacre Historic Site map, dated July 1, 2000.[11]

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[8] "Frequently Asked Questions," Sand Creek Massacre National Historic Site, last modified March 2020, https://www.nps.gov/sand/planyourvisit/faq.htm; "Sand Creek Massacre NHS Park Store," Sand Creek Massacre National Historic Site, last modified February 2020, https://www.nps.gov/sand/learn/bookstore.htm; National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 4, 21.

[9] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[10] *Sand Creek Massacre National Historic Site Establishment Act of 2000*, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[11] *Sand Creek Massacre National Historic Site Establishment Act of 2000*, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

The enabling legislation explicitly mentions the Cheyenne and Arapaho Tribes of Oklahoma, the Northern Cheyenne Tribe, and the Northern Arapaho Tribe and outlines descendants' rights, access to, and use of federally acquired land within the site in accordance with the terms and conditions of a written agreement between the secretary and the tribe of which the descendant is a member.[12] In practice, this written agreement includes cooperative agreements between the site and the federally recognized tribes in the enabling legislation, as well as regional tribal consultation payment guidelines.[13] Importantly, the legislation also mandates that the secretary consult with and seek the advice of descendants and tribes in park planning, educational programming, and operations.

National Register of Historic Places and Boundary Increase

The Sand Creek Massacre site was listed in the National Register of Historic Places on September 28, 2001.[14] The nomination form pulled heavily from documentation prepared for the Sand Creek Massacre National Historic Site Study Act of 1998 as part of the research on the site's location and leading to the enabling legislation in 2000.[15] The total acreage of the massacre site at the time of its listing in the National Register was 7,680 acres. The National Register boundary encompasses the key elements of the Sand Creek Massacre, including the Cheyenne and Arapaho village site that was attacked, the sandpit area where most of the fighting and killing took place, the area of Cheyenne and Arapaho flight, and the point from which Colonel John Chivington and his troops launched their attack on the encampment.[16]

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[12] *Sand Creek Massacre National Historic Site Establishment Act of 2000*, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[13] See the following SAND Electronic Records for more detail: "Cooperative Agreement between the United States Department of the Interior, National Park Service and The Northern Cheyenne Tribe, Agreement #H1315110001," 2011; "Task Agreement under Cooperative Agreement Number H1315110002 between The United States Department of the Interior, National Park Service and The Northern Arapaho Tribe," 2012; "Cooperative Agreement between The United States Department of the Interior, National Park Service and The Cheyenne and Arapaho Tribes of Oklahoma, Agreement #H1315110003," 2011; and "Tribal Consultation Payment Guidelines" National Park Service Intermountain Region, 2011, 1–2.

[14] The Site's National Register ID is #01001055.

[15] Sand Creek Massacre National Historic Site Study Act of 1998, Public Law 105-243, *U.S. Statutes at Large* 112 (1998), 1579–1580.

[16] Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, i, iii, 7-1, 8-24, 8-34 to 8-37, 9-10-43, Photographic Index-46, Map-49.

A boundary increase for the Sand Creek Massacre Site National Register was accepted on September 19, 2016. The revised total acreage of the National Register listing was 8,116.828 acres. The 640 acres, also known as Section 36, was previously included in the 2000 congressionally authorized boundary but had remained in the possession of the State of Colorado since 2015.[17] The federal government acquired the 640 acres in FY 2016.[18] This section of land had similar topography as the rest of the designated boundary. It was a significant addition as it is the location where Army troops stopped on the night of November 28, 1864, and prepared for attack. The parcel also contains important natural resources and habitat.[19]

Site Significance

The site is significant in a number of ways that speak to the brutal violence that the US government and military inflicted upon the Cheyenne and Arapaho people and the tribes' resilience in the face of this devastation. During development of the site's general management plan, site staff and tribal representatives identified seven significance statements expressing why the site's resources and values are important. These seven significance statements are as follows:

1. The site of the Sand Creek Massacre has sacred significance to the Cheyenne and Arapaho Tribes, particularly those tribal members who are descended from victims and survivors of the massacre.
2. The site is a reminder of the tragic extremes of the 500 years of conflict between American Indians and European Americans over land that now comprises the United States.
3. The intense distrust resulting from the Sand Creek Massacre influenced virtually all subsequent conflicts between American Indians and the US Army.
4. The Sand Creek Massacre is an essential symbol of the struggles of American Indian tribes to maintain their ancestral ways of life.
5. The massacre profoundly disrupted the social, political, and economic structures of the Cheyenne and Arapaho Tribes.

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[17] Astrid Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)* (Denver, CO: History Colorado, Office of Archaeology and Historic Preservation, 2016), 2, 7-4, 7-6.

[18] US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2018, National Park Service*, https://www.nps.gov/aboutus/upload/FY-2018-NPS-Greenbook.pdf. Accessed October 12, 2023; ONPS Summaries, 32.

[19] Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 7-5, 8-10.

6. By eliminating most Cheyenne advocates for peace, the massacre hardened resistance to white expansion and escalated warfare between the US Army and the Cheyenne, Arapaho, and Sioux Tribes.
7. The circumstances of the massacre elicited widespread national outrage, even against the backdrop of the Civil War, which forced substantial changes in US Indian policy.[20]

The fundamental resources and values of the site are closely related to the site's legislative purpose but are more specific than what is in the legislation and in the site's significance statements. The fundamental resources and values identified during the development of the 2015 *General Management Plan* and reaffirmed in the 2017 *Foundation Document* include the massacre site, the cultural and natural landscape, the museum and archival collections, an environment conducive to healing for tribal members and descendants, a sense of place, memorialization and commemoration including those ceremonies and events, repatriation site, and tribal cultural observances and ethnographic resources.[21]

Brief Discussion of Pre-National Park Service Acquisition

Historian Ari Kelman's work—both his 2013 book *Misplaced Massacre* and his appendix to Volume I of the site's administrative history—contains detailed information, which we summarize here.[22] A marker titled "Sand Creek Battle Ground" was erected by local civic organizations (Colorado Arkansas Valley Inc., Eads and Lamar Chambers of Commerce, and local residents) in 1950 on the private property of rancher Bill Dawson.[23] This area is currently identified as the "Monument and Overlook" on site maps.[24] In 1978, Southern Cheyenne Tribe Chief Laird Cometsevah and the Sacred Arrow Keeper had consecrated the ground in this area, reclaiming the land for the Cheyenne people, who heard voices and crying children near the monument overlook. In 1993, artifact collectors in the area of the monument did not discover artifacts associated with the massacre. The collectors found this lack of artifacts and evidence of the massacre odd. They contacted historians at the Colorado Historical Society, which instigated further research into the massacre's location.

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[20] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 16. These significance statements were reaffirmed in the site's 2017 foundation document: National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 6.

[21] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 7–8.

[22] Kelman's appendix to Volume I of the site's administrative history was still in production at the time of this document's completion.

[23] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History,* by Ari Kelman. Draft, 2016, 1.

[24] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, ii.

Their ensuing research worked to reconcile Cheyenne and Arapaho history and cultural authority, historic documentation, and archeology. A determination of the massacre's location would support efforts by Cheyenne descendants to pursue reparations under Article 6 in the Treaty of the Little Arkansas as well as the efforts of Senator Ben Nighthorse Campbell, a member of the Cheyenne Council of 44 Chiefs, to preserve the property and make it a unit of the national park system.[25]

The research legislation, signed on October 6, 1998, by President Bill Clinton, acknowledges the federal debt from the Treaty of the Little Arkansas and labels the 1864 bloodshed as a "massacre" rather than a "battle." By December 1998, researchers investigated the private property of ranchers Chuck and Sheri Bowen, whose property was upstream from Bill Dawson's. The Bowens had investigated their own property since 1993 and presented artifacts to the researchers indicating that a significant portion of the massacre had taken place on their property.[26] Research conducted on the Kern property, adjacent to the Dawson property, resulted in no human remains discovered at the site.[27] Dr. Alexa Roberts, a cultural anthropologist from the Southwest Regional Office (and who later became the site's first superintendent), was tasked with collecting oral histories from massacre descendants. Collectively, this research revealed that the parties involved held different worldviews. Compounding the challenges of research and worldview, deep distrust and complex personal and political dynamics were at work among the parties involved. Additional challenges were brought forth by the public, local leaders, Congress, and special interest groups.[28]

On November 7, 2000, Congress passed *The Sand Creek Massacre National Historic Site Establishment Act of 2000*, which allowed for the establishment of the National Historic Site contingent on acquiring the necessary land.[29] In the spring of 2002, Jim Druck of Southwest Entertainment purchased rancher Bill Dawson's property (the "traditional massacre site") and proposed to turn the property over to the Cheyenne and Arapaho Tribes. In December 2003, Druck handed over the deed to Chief Laird Cometsevah. Meanwhile, the Bowens were not interested in selling their property. By 2004, the federal

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[25] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History*, by Ari Kelman. Draft, 2016, 1–2, 5, 7–10; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 2001, 7-1 through 7-13 provides map details and discusses the actions leading up to and the conclusions of the site location studies.

[26] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History,* by Ari Kelman, draft, 2016, 25–26.

[27] Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 2001, 7-8 to 7-10.

[28] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History*, by Ari Kelman, draft, 2016, 28–55, 87–91; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 2001, 7-15 to 7-21 discusses the difference in interpretation of the site location.

[29] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

government had acquired 920 acres from private landowners.[30] Also in 2004, Senator Campbell sponsored the *Sand Creek Massacre National Historic Site Trust Act of 2004*, which would have placed the former Dawson property into federal trust so that it could become part of the national park system. On August 2, 2005, President George W. Bush signed the *Sand Creek Massacre National Historic Site Trust Act of 2005*.[31]

The 2005 act designated 1,465 acres, including all mineral rights—but excluding the house; shop building; livestock corral and shelter; and water, wastewater, and utility connections of the former Dawson Ranch—as land held in trust for the Cheyenne and Arapaho Tribes of Oklahoma. As stated in the act, the Secretary of the Interior administers the trust property in perpetuity "as part of the Sand Creek Massacre National Historic Site, only for historical, traditional, cultural, and other uses in accordance with" the enabling legislation. The act also states that the secretary may construct a facility on the property only after consulting with, soliciting advice from, and obtaining agreement of the Cheyenne and Arapaho Tribes of Oklahoma, the Northern Cheyenne Tribe, and the Northern Arapaho Tribe.[32]

Finally on September 9, 2006, the former Dawson Ranch property, owned by the Cheyenne and Arapaho Tribes of Oklahoma, was conveyed into federal trust, bringing the total acreage of the national historic site to 2,385 acres. On April 23, 2007, Secretary of the Interior Dirk Kempthorne formally established the Sand Creek Massacre National Historic Site with an effective date of April 27, 2007. The site was dedicated on April 28, 2007, with a ceremony that was part celebration and part memorial service.[33] It officially opened to the public part time in May 2007.

While conveyance of the former Dawson Ranch property was underway, Alexa Roberts and other NPS staff had been overseeing efforts on fire prevention, acquiring equipment, providing training to local partners, beginning environmental monitoring and research, and cooperating with massacre descendants on ongoing repatriation efforts.[34]

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[30] "Department of the Interior. National Park Service. Sand Creek Massacre National Historic Site 4/27/2007-Organization Authority Record," National Archives and Records Administration Catalog. Accessed October 12, 2023, https://catalog.archives.gov/id/10476108.

[31] Sand Creek Massacre National Historic Site Trust Act of 2005, Public Law 109-45, *U.S. Statutes at Large* 119 (2005): 445–447; US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History*, by Ari Kelman, draft, 2016, 94–98.

[32] Sand Creek Massacre National Historic Site Trust Act of 2005, Public Law 109-45, *U.S. Statutes at Large* 119 (2005), 445–447.

[33] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History,* by Ari Kelman, draft, 2016, 101–103; "Department of the Interior. National Park Service. Sand Creek Massacre National Historic Site 4/27/2007-Organization Authority Record," National Archives and Records Administration Catalog. Accessed October 12, 2023, https://catalog.archives.gov/id/10476108.

[34] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History*, by Ari Kelman, draft, 2016, 92, 99–100.

Other research efforts consisted of baseline condition assessments for the site's natural and cultural resources and an evaluation of resources for anticipated site visitation. The following chapters discuss these research and implementation efforts in greater detail.

Readers are encouraged to consult historian Ari Kelman's book and his draft administrative history to gain a deeper understanding of the history of commemoration of the Sand Creek massacre prior to the establishment of the site; key Cheyenne and Arapaho leaders and their relationships with senators, landowners, historians, archeologists, and representatives from the National Park Service; controversies surrounding the location of the massacre site; and challenges for the procurement of land for the establishment of the site.

CHAPTER TWO

Management and Site Programs

Superintendent Alexa Roberts and Park Operations Manager Karl Zimmermann were critical to Sand Creek Massacre National Historic Site's development and management in the years examined in this administrative history. Dr. Roberts was hired in 1994 as a cultural anthropologist in the NPS's Southwest Regional Office in Santa Fe. The following year, the NPS reorganized and made it a support office for the new Intermountain Region (IMR). Roberts began working on the Sand Creek site in 1999, when she was asked to lead the team conducting oral histories for the site location effort. Congress passed the site's enabling legislation in 2000, and in 2001, Roberts was named the project manager, "head[ing] up the effort to get the park established" in a small office at Bent's Old Fort National Historic Site (BEOL) in nearby La Junta, Colorado.[1] She stayed in that role until 2003, when she was named the Sand Creek Massacre National Historic Site's superintendent.

In 2007, the NPS Intermountain Region formed the High Plains Group, consisting of Sand Creek Massacre National Historic Site, Bent's Old Fort National Historic Site, and Capulin Volcano National Monument. Roberts was moved to Bent's Old Fort as general superintendent of the High Plains Group. Alden Miller, park ranger at Sitka National Historical Park, was hired as superintendent at Sand Creek Massacre. Miller left in 2011, and Roberts continued as High Plains Group superintendent, overseeing Sand Creek and Bent's Old Fort, as well as the superintendent of Capulin Volcano. The Sand Creek Massacre superintendent position was replaced with a site manager position, held by Karl Zimmermann. Roberts retired from the National Park Service in October 2018.

Park Operations Manager Karl Zimmermann was born and raised in Colorado. Zimmermann worked at Wind Cave National Park in South Dakota, Muir Woods National Monument in California, and then as a park ranger under the chief of resources at Bent's Old Fort National Historic Site. Roberts found that she was "borrowing Karl a lot" for work at Sand Creek despite his employment at Bent's Old Fort, and he was finally brought over full time to Sand Creek in 2006.[2] Zimmermann said that their working relationship was so effective because they "complement each other very well":

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[1] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[2] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

> I did things she didn't want to do, and she did things I didn't want to do. [Roberts laughs]. Together we moved forward. We had, like, a similar set of goals and how we looked at the park I think was very similar. When we dealt with the tribes, we thought pretty much the same and have tried to work diligently with the tribes from the formal tribal representatives to the tribal members as a whole, to figure out what they wanted and how we as a National Park and Park Service unit could meet those goals. I think they represented our efforts and I think that relationship was the big deal.

Roberts concurred, adding: "And we respected the significance of Sand Creek, not just the topic, the meaning to them—I mean, this wasn't like any other park unit."[3]

This commitment to respect guided site managers' work at Sand Creek Massacre National Historic Site in its first decade is evident in their management decisions and in the programs outlined in this chapter. The following sections examine the site's enabling legislation; how site managers interpreted the enabling legislation; and the research, partnerships, and actions they took prior to the opening of Sand Creek Massacre National Historic Site. The administrative relationship between the site and other NPS units as well as the development of site policies and planning documents are also discussed. The planning documents developed during this period set the vision for both short-term and long-term site operations, and significant space is given to these planning documents. Finally, a discussion of site development (administrative spaces, visitor services, infrastructure, and building rehabilitation) is included, as well as justifications for these development actions. Much of the material referenced prior to 2007 is important to understand the context of management actions.

Interpreting and Implementing the Enabling Legislation

The enabling legislation for the Sand Creek Massacre National Historic Site (Public Law 106-465) is unique in many ways, and site staff have emphasized this uniqueness in their work. Some of the most important aspects in which the legislation is notable include the following:

- The tribal input and involvement in writing the authorizing legislation
- The intentional designation of the site as a massacre
- The specific description of rights and needs of tribal members, including descendants[4]

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[3] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[4] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

These three features of the legislation have guided management's decisions and actions. For example, as the only unit in the National Park Service to have "massacre" in its name, site management has kept this trauma and sensitivity at the forefront of decision discussions with Cheyenne and Arapaho representatives.[5] By prioritizing descendant rights, the authorizing legislation has challenged site management to have more meaningful conversations with tribal representatives to balance tribal needs with the operation of a National Park Service unit, guided by multi-tiered federal laws and policies. Site managers have tried to approach these challenges with sensitivity, respect for the tribes, and honor for the ancestors.

The enabling legislation defines "descendant" as "a member of a tribe, an ancestor of whom was injured or killed in, or otherwise affected by, the Sand Creek Massacre." The term "tribe" is defined as "the Cheyenne and Arapaho Tribes of Oklahoma; the Northern Cheyenne Tribe; or the Northern Arapaho Tribe." The legislation mandates that reasonable needs of descendants be considered in park planning and operations, especially with respect to commemorative activities in designated areas of the site. Descendants or other members of a tribe would have reasonable access to federally acquired land on the site for the purpose of carrying out a traditional, cultural, or historical observance, and no fee would be charged for this access. In granting this access, one or more specific sections of the site would be temporarily closed to the general public to protect the privacy of tribal members engaging in a traditional, cultural, or historical observance in those areas. Any such closure would be made so that the smallest practicable area was affected for the minimum period necessary. The legislation also mandates that the secretary consult and solicit advice and recommendations from descendants and tribes and authorizes entering into cooperative agreements with the tribes and the state.[6]

The enabling legislation further authorized dedicating of a portion of the federally acquired land to the establishment and operation of a site for the interment, reinterment, preservation, or protection of items such as Native American human remains, associated or unassociated funerary objects, sacred objects, and objects of cultural patrimony that are repatriated under the Native American Graves Protection and Repatriation Act (25 U.S.C. 300 et seq.) or any other provision of law.[7] An important consideration in interpreting this section of the enabling legislation is that the Cheyenne and Arapaho Tribes do not consider the interment of their ancestors in the site's repatriation area as a reburial. Instead, interment is considered the first burial since the bodies of their ancestors were not buried after the massacre. Site management supports this position by the tribes, and it

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[5] Alexa Roberts and Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[6] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[7] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

is reflected in their management decisions and interpretation of federal policies.[8] Repatriation at Sand Creek Massacre National Historic Site is discussed in more detail throughout this document.

The enabling legislation describes the authorized boundary as approximately 12,480 acres in Kiowa County. Additionally, the legislation prioritizes acquiring the land on which local civic organizations placed the historic marker engraved with "Sand Creek Battle Ground Nov. 29 & 30, 1864" in 1950.[9] This area is now known as "Monument Hill" at the site. The legislation additionally authorizes the National Park Service to acquire lands through purchase, donation, exchange, or other means, though land owned by the State of Colorado could only be acquired through donation.[10] By the end of 2017, the national historic site comprised 3,025 acres of land, of which approximately 1,465 acres are held in trust by the United States for the Cheyenne and Arapaho Tribes and managed by the National Park Service. Public Law 109-45 (2005) authorized the tribal land held in trust, and the Cheyenne and Arapaho Tribes of Oklahoma conveyed the title to the United States on September 9, 2006.[11] The NPS did not acquire any additional land until October 2022 (outside of the time period examined in this study), when the NPS purchased an additional 3,478 acres of land to expand the site.[12]

Another important provision in the enabling legislation is the authorization of a support facility to be located outside the designated boundary in Kiowa County, subject to an agreement with the commissioners of Kiowa County.[13] In 2007, members of the National Park Service and Kiowa county discussed locating this support facility at the historic Murdock Building in Eads. Though non-federal funds were raised in the

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[8] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[9] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[10] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[11] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 4; Sand Creek Massacre National Historic Site Trust Act of 2005, Public Law 109-45, *U.S. Statutes at Large* 119 (2005): 445–447; and Alexa Roberts, "WASO Briefing FY07, Sand Creek Massacre National Historic Site," January 15, 2007, 1–2, SAND Electronic Records.

[12] "US Interior Secretary Haaland announces expansion of Sand Creek Massacre National Historic Site in Colorado," *CPR News*, October 5, 2022, https://www.cpr.org/2022/10/05/u-s-interior-secretary-haaland-announces-expansion-of-sand-creek-massacre-historic-site-in-colorado.

[13] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

intervening years, federal funds could not be directed to rehabilitate the building until the passage of legislation in 2015. Rehabilitation work on the Murdock Building was completed in 2020.[14]

Finally, the enabling legislation states that the site would "memorialize, commemorate, and provide information to visitors to the site . . . to enhance cultural understanding" about the massacre site and "assist in minimizing the chance of similar incidents in the future."[15] This notion of "never again" is found at many sites of conscience, which seek to remember and preserve traumatic memories to "ensure a more just and humane future."[16] This focus on learning from the past in order to make a better present and future is another unique aspect of the legislation that has driven how the site is managed.

Overview of Management Actions (2007–2017)

Soon after being named Superintendent of Sand Creek Massacre NHS, Alexa Roberts asked herself, "How are we going to *do* this?" Roberts's personal conviction to honor the descendants and the tribes' history was supported by site staff. As she recounted in her oral history, Roberts noted that the "Tribes have *spiritual* stewardship. The National Park Service has *physical* stewardship."[17] Over the years as staffing has evolved, site staff have prioritized tribes' worldview and concerns, as well as honoring ancestors and descendant rights. Roberts's contributions were mentioned in all of the oral history interviews collected for this administrative history, and she was honored for her sensitive work in 2018 with Meritorious Service Award of the Department of the Interior.[18]

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[14] Priscilla Waggoner, "NPS Receives Funding to Complete New Sand Creek Visitors' Center," *Kiowa County Independent,* August 8, 2018, https://kiowacountyindependent.com/news/1280-nps-receives-funding-to-complete-new-sand-creek-visitors-center; National Park Service, *State of the Park Report,* 2017, https://irma.nps.gov/DataStore/DownloadFile/604100, 44; "Murdock Building Rehabilitation," Colorado Preservation Inc., http://coloradopreservation.org/projects/current-projects/murdock-building-rehabilitation. Last modified November 2020; Sand Creek Massacre National Historic Site "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2; Alexa Roberts and Karl Zimmermann, "Letter to the Editor-Roberts and Zimmerman," *Kiowa County Independent,* April 3, 2019, https://kiowacountyindependent.com/news/1553-letter-to-the-editor-roberts-and-zimmerman.

[15] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[16] "About Us," International Coalition of Sites of Conscience (accessed October 12, 2023), https://www.sitesofconscience.org/en/who-we-are/about-us.

[17] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[18] Russ Baldwin, "Former Park Service Superintendent Receives Major Award," *The Prowers Journal,* December 4, 2018, https://theprowersjournal.com/2018/12/former-park-service-superintendent-receives-major-award.

Site staff undertook a rigorous research, consultation, and planning effort from 2000 to 2006 that helped them prepare to open the site to visitors.[19] A list of these early reports can be found in the Sand Creek Massacre NHS *Foundation Document*.[20] According to Roberts and Zimmermann, this effort helped answer the question, "How are we going to *do* this?" and set the stage to develop an interim site management plan prior to dedication of the site and opening the site to the public plan.[21] Roberts emphasized that the 8 years before the site's opening were critical to developing trust and strong relationships with tribal and community partners:

> We had a lot of time for those first eight years before establishment and thank god for that. I'm so glad it took us so long because it gave us all kinds of time to develop a trustful relationship, not only with the tribes but with the community, and with these other partners. We had time to get to know each other and build a level of trust. And it was just so fundamental, it was so important—the community was leery at first, the tribes were certainly leery and they had good reason to be. . . . [If] we had just jumped into being a park all of a sudden, it would have been very different.[22]

Another important question that site managers asked was "What is *appropriate* for this site?" This question applied to how NPS staff would manage resources as well as the type and level of development (i.e., appropriate facilities, appropriate management) present at the site. Because of the enabling legislation and its mandate to meaningfully involve the tribes in site management, managers recognized that certain programs and processes would not be appropriate for this site.

Early site managers looked to other examples—such as the United States Holocaust Memorial Museum in Washington, DC, which interprets similar traumatic history, genocide, destruction of culture, and survival with a future focus—to help determine what would be appropriate management of Sand Creek Massacre National Historic Site. All staff members that the study team spoke to during the oral history collection for this administrative history mentioned visiting the Holocaust Museum in 2014. Karen Wilde, the Tribal Liaison for the Historic Site from 2011 to 2021 described the visit: "We went before it opened . . . [and] we had some private time with their staff. Then we joined in the rest of the public that was there. They showed us what they did. They showed us how they interpret things. Everybody got to see as much of the museum as they wanted to, to help with interpretation here."[23] The experience helped them gain a sensitivity to understand and talk about the Sand Creek Massacre.

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[19] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[20] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 52–55.

[21] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, *Interim Site Management Plan/Environmental Assessment,* 2006, 3–6.

[22] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[23] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

Roberts, Zimmermann, and other site managers felt very protective of Sand Creek Massacre National Historic Site and its mission. They were prepared to say "no" to regional or Washington-level directives that applied to other NPS units if those directives would threaten resource protection or were not appropriate for the site.[24] Roberts said that she and Zimmermann "weren't held by preconceived notions of how a park ran." For example, the site's neighbors were concerned about the park eliminating cattle grazing because it was a common regional wildfire prevention practice. The NPS has generally opposed cattle grazing because it can have a significant impact on a park's natural and cultural resources, including trampling plants, degrading or altering wildlife habitats, and damaging archeological resources. Roberts, Zimmermann, and other NPS staff responded by organizing a regional workshop on livestock and landscapes, and the gathering helped NPS leadership understand how and why grazing could be beneficial. The result, Roberts recalled, was that "now grazing is not—it's not a taboo." Laughing, she added, "We were like, well, we could do this if we wanted to. And why are you doing it and how can we do it? Or we're not going to do it, but why aren't we going to do it? We had those questions, because we didn't have answers and because we didn't have those answers it allowed us to search and gather information."[25] By questioning established bureaucratic protocols when necessary, Roberts and Zimmermann were able to build processes and programs that best suited the site's particular needs and circumstances.

Site Development and Facilities

Though the enabling legislation prioritizes preserving the landscape as it was at the time of the Sand Creek Massacre, some development was needed to facilitate visitor access to the site. In a January 2007 briefing to United States Senators Wayne Allard and Ken Salazar and Representative Marilyn Musgrave, Superintendent Alexa Roberts provided updates on the site and its management prior to its public opening. Roberts noted that the site was comprised of rural ranch land with no functional facilities that could accommodate public access. The new National Historic Site had several urgent needs, including administrative offices for park personnel, a utilities system (including a septic system), electrical lines, natural gas, telephones, public restrooms, and an information kiosk or visitor contact station. It also needed improvements to the dirt access road (maintained by the county), and a parking area. Roberts anticipated that minor facilities development would be accommodated in the site's FY 2006 base budget ($462,000) but estimated that immediate site development needs would cost $750,000, excluding access road and parking

[24] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[25] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

improvements.[26] Thus, many of Roberts's preparations and concerns focused on preparing the site for imminent opening to the general public, and management priorities and actions were guided by the interim site management plan.[27]

Sand Creek Massacre National Historic Site was established and dedicated in April 2007 and opened to the public on a limited basis (3 days a week) from June 1 to December 1.[28] This limited opening followed the recommended actions in the interim site management plan.[29] The site was scheduled to open to the public 7 days a week beginning on April 1, 2008. The site used 20 percent recreational fee funds and repair/rehabilitation funds to expand its interim facilities and basic visitor services, and the site continued its consultation with the Cheyenne and Arapaho Tribes, the state, Kiowa County, and other stakeholders. A general management plan had also been initiated to help guide management decisions and site development.[30]

Staffing and Administrative Relationships to Other NPS Units

Sand Creek Massacre National Historic Site's relationship with other national park units has long been critical to the site's success. In particular, the site is closely linked in its administration, history, interpretive story, and resources to Bent's Old Fort National Historic Site (BEOL). Located 80 miles from Sand Creek Massacre National Historic Site, BEOL interprets the history of a fort established by William and Charles Bent and Ceran St. Vrain in 1833 to trade with Plains Indians, trappers, and travelers on the Santa Fe Trail. The historic site features a reconstructed adobe fort, built by the NPS in 1976. The administrative relationship between Sand Creek Massacre NHS and Bent's Old Fort NHS first began in 2001 as the Intermountain Region created a small Sand Creek Massacre NHS establishment office and based it out of Bent's Old Fort NHS. At this time, Alexa Roberts was the Sand Creek Massacre NHS project manager, working under Bent's Old Fort NHS Superintendent, Don Hill. In 2002, the Sand Creek Massacre NHS administrative office

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[26] Alexa Roberts, "WASO Briefing FY07, Sand Creek Massacre National Historic Site," January 15, 2007, 2, SAND Electronic Records.

[27] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 42–51.

[28] Alden Miller, "Sand Creek Massacre National Historic Site Briefing to Senator Ken Salazar, Senator Wayne Allard, Rep. Marilyn Musgrave," February 1, 2008, 1, SAND Electronic Records.

[29] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 42–54.

[30] Alden Miller, "Sand Creek Massacre National Historic Site Briefing to Senator Ken Salazar, Senator Wayne Allard, Rep. Marilyn Musgrave," February 1, 2008, 1, SAND Electronic Records.

was moved to Eads[31] and was in a leased space at 910 Wansted Street.[32] The site was given its own organizational code (1315),[33] independent of Bent's Old Fort NHS. The Sand Creek Massacre NHS project manager position was converted to a superintendent position in 2003, but Bent's Old Fort and Sand Creek Massacre remained linked while Sand Creek Massacre was building staff and becoming a national park unit.[34]

Superintendent Don Hill retired in 2003 and Cindy Ott-Jones became the new superintendent at Bent's Old Fort NHS. In 2005, Ott-Jones was designated to be the mentor of Chris Moos, a new superintendent at Capulin Volcano National Monument (CAVO). In 2007, Ott-Jones moved to a new position at another national park unit—the same year Sand Creek Massacre National Historic Site was formally dedicated. At this same time, the Intermountain Region was forming park groups to distribute the span of supervisory control and lessen the supervisory workload on the regional directorate. The Intermountain Region created the Southeast Colorado Group consisting of SAND, BEOL, and CAVO after Ott-Jones's departure. The three sites subsequently renamed themselves the "High Plains Group" to be inclusive of CAVO's location in northeast New Mexico. There were no guidelines on how the group should work so the group determined its mission was to work collaboratively and collectively to ensure resource protection and excellent visitor experience of the group parks. This collaboration included sharing staff, budgets, and equipment to meet unit goals.[35]

After the creation of the High Plains Group, Alexa Roberts was moved from Sand Creek Massacre NHS to the superintendent's position at Bent's Old Fort and was responsible for supervising the CAVO and SAND superintendents. Alden Miller was hired as the new superintendent at SAND. Miller began his career with the National Park Service in 1994, when he was a law enforcement ranger at Minute Man National Historical Park in Lincoln, Massachusetts. Before becoming superintendent at Sand Creek Massacre NHS, he also served in various roles at Little Bighorn Battlefield National Monument in Montana, San Antonio Missions National Historical Park in Texas, and Sitka National Park in Alaska.[36] Miller served as superintendent of Sand Creek Massacre NHS during its formative years until 2011, when he moved to Navajo National Monument in Arizona. That year,

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[31] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," Trinidad, CO, February 8–9, 2017, 6, SAND Electronic Records.

[32] National Park Service, *Sand Creek Massacre National Historic Site Physical Security Assessment*. Intermountain Region, Visitor and Resource Protection, 2013, 6, SAND Electronic Records.

[33] Organization chart, October 17, 2016, Sand Creek Massacre National Historic Site, SAND Electronic Records.

[34] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 5–6, SAND Electronic Records.

[35] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 6, SAND Electronic Records.

[36] National Park Service, Visitor and Resource Protection, *The Morning Report*, June 30, 2011, http://npshistory.com/morningreport/2011/06-30.htm.

Bent's Old Fort NHS and Sand Creek Massacre NHS were united under one superintendent—Alexa Roberts. Bent's Old Fort and Sand Creek Massacre NHS have remained close, including their connection with the High Plains Group.[37] This relationship has included budget flexibility; technical support; and shared costs for equipment, administrative spaces, and positions.[38]

Although the site's administrative office moved to Eads in 2002, the NPS only had one room with one desk until the USDA moved out of its offices at 910 Wansted in 2008. Staff other than the Superintendent remained in the administrative offices at Bent's Old Fort National Historic Site and would commute the 80 miles between the sites to complete daily tasks.[39] In late 2007, Superintendent Alden Miller started work at the 910 Wansted location. In 2008, the NPS expanded into the whole former USDA building, and SAND's administrative offices were moved back to Eads. Discussions that began in 2007 with Kiowa County eventually led to rehabilitation of the historic Murdock Building in downtown Eads for use as administrative offices, a visitor center, and a research center. Stakeholders and partners worked to rehabilitate the building for the next 12 years, and legislation in 2015 finally allowed federal funds to be used for the rehabilitation.[40]

The Sand Creek Massacre NHS FY 2006 budget of $462,000, supported three full-time staff members: Superintendent Alexa Roberts, Administrative Technician Theresa Horak, and Education Technician Craig Moore.[41] Roberts anticipated that once the site

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[37] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 6, SAND Electronic Records.

[38] Alexa Roberts and Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021; US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2010, National Park Service*, https://www.nps.gov/aboutus/upload/FY_2010_NPS_Greenbook_508.pdf. Accessed October 12, 2023, ONPS-103. US Department of the Interior. *Budget Justifications and Performance Information, Fiscal Year 2009, National Park Service*. https://www.doi.gov/sites/doi.gov/files/migrated/restoration/about/budget/upload/greenbook_09.pdf. Accessed October 12, 2023, ONPS-175; Project Management Information System (PMIS) #138676 and #143863. US Department of the Interior, *National Park Service*.

[39] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #138676.

[40] The rehabilitation was completed in 2020 and most site staff moved into their new offices by 2021 (both outside the timeframe of this administrative history). "Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015," Public Law 113-291, *U.S. Statutes at Large* 128 (2014): 3806; National Park Service. *State of the Park Report,* 2017, 43–44; "Murdock Building Rehabilitation," Colorado Preservation Inc., http://coloradopreservation.org/projects/current-projects/murdock-building-rehabilitation/ (last modified November 2020); Sand Creek Massacre National Historic Site, "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2, SAND Electronic Records; Priscilla Waggoner, "NPS Receives Funding to Complete New Sand Creek Visitors' Center," *Kiowa County Independent,* August 8, 2018, https://kiowacountyindependent.com/news/1280-nps-receives-funding-to-complete-new-sand-creek-visitors-center; Alexa Roberts and Karl Zimmermann, "Letter to the Editor-Roberts and Zimmerman," *Kiowa County Independent,* April 3, 2019, https://kiowacountyindependent.com/news/1553-letter-to-the-editor-roberts-and-zimmerman.

[41] Alexa Roberts, "WASO Briefing FY07, Sand Creek Massacre National Historic Site," January 15, 2007, 2; US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2008, National Park Service*, http://npshistory.com/publications/management/greenbook/2008.pdf (accessed October 12, 2023), ONPS-192; US Department of the Interior. *Budget Justifications and Performance Information, Fiscal Year 2007, National Park Service*, http://npshistory.com/publications/management/greenbook/2007.pdf (accessed October 12, 2023), ONPS-130.

was established, two additional staff members would be needed.[42] By the time of the site's dedication in April 2007, however, there were four permanent staff members, with the addition of Karl Zimmermann as Chief of Resources.[43] Prior to the site dedication and the site's opening to the public, Sand Creek Massacre NHS retained a few volunteers that assisted with various tasks on an as-needed basis. More volunteers were expected to be needed once the site formally opened.[44]

Though the administrative and staffing changed at SAND after the dedication in April 2007, by February 2008, the site's base budget of $653,000 supported four full-time staff members. These positions included Superintendent Alden Miller, Education Technician Moore, Chief of Resources Zimmermann, and Office Automation Clerk Janet Frederick. Three more full-time staff were anticipated to be hired in that fiscal year for the positions of Maintenance Worker, Park Guide/Tribal Liaison, and Chief Ranger.[45] Since discussions had been underway concerning the off-site Murdock Building, also in February 2008, the park submitted an Operations Formula System (OFS) request in anticipation of additional staffing needs for the off-site facility. The request was not funded before the OFS process came to a halt in 2010.[46]

By June 2008, the number of full-time SAND site staff had increased, and volunteers were at the site. On average, two researchers per year interacted with site staff. The Western National Parks Association–Tucson (WNPA) was established as the site's bookstore vendor.[47] At the conclusion of the general management planning process there were seven full-time permanent positions.[48] At the time of the *State of the Park Report* in 2017, there were 9.5 permanent staff at the site.[49]

In 2016, the Intermountain Regional Comptroller and the regional director assessed how groups, including the High Plains Group, were functioning. The High Plains Group served as a pilot for other group assessments from which the management tool kits would be developed and made available to other groups and the regional directorate.

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[42] Alexa Roberts, "WASO Briefing FY07, Sand Creek Massacre National Historic Site," January 15, 2007, 2.

[43] National Park Service, *State of the Park Report,* 2017, 44.

[44] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 14, 37.

[45] US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2009, National Park Service*, http://npshistory.com/publications/management/greenbook/2009.pdf (accessed October 12, 2023), ONPS-190; Alden Miller, "Sand Creek Massacre National Historic Site Briefing to Senator Ken Salazar, Senator Wayne Allard, Rep. Marilyn Musgrave," February 1, 2008, 1.

[46] Sand Creek Massacre National Historic Site, "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2.

[47] "Sand Creek Massacre NHS Park Store: Western National Park Association," Sand Creek Massacre National Historic Site, last modified March 11, 2021, https://www.nps.gov/sand/learn/bookstore.htm.

[48] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 180.

[49] National Park Service. *State of the Park Report,* 2017, viii.

During a 2017 retreat, members of the High Plains Group discussed the previous year's assessment as well as successes, challenges, solutions, processes, actions, and upcoming events and projects.[50]

In several cases, the early and key staff members retained their positions at Sand Creek Massacre National Historic Site long enough to allow them to get to know the tribes and the local community and to build respect and trust.[51] Indeed, Alexa Roberts and Karl Zimmermann, in a letter to the editor of the *Kiowa County Independent* newspaper announcing their retirements from the National Park Service, noted that they had been at the site and in the community for most of 20 years.[52] The 2017 *State of the Park Report* emphasized concerns about staff succession and the loss of institutional knowledge and relationships built with the tribal representatives, local community, state government, and stakeholders. The interviewees for this administrative history also expressed their concern for the loss of these relationships and institutional knowledge, and that the next generation of management would not hold the same conviction to honor the tribes in the same way.[53] In fact, prior to the completion of this administrative history volume, two longtime staff members, Karen Wilde and Cynthia Wiley, left Sand Creek Massacre National Historic Site for positions elsewhere. Wilde had served as the site's Tribal Liaison since 2011; Wiley was hired as Curator in 2015 and became the Integrated Resources Program Manager in 2020. Sharply illustrating the impact of employee succession, Karen Little Coyote, the Southern Cheyenne tribal representative for the Cheyenne and Arapaho Tribes, Oklahoma from 2010 to 2018 was blunt when asked what the NPS could do differently at the site: "Bring Alexa back and keep Karen [Wilde]." Indicating that she was (sort of) joking, she added, "No, but if they would just work with the [tribal] representatives and stay positive and have a good mind to think about our ancestors there, because you know they're still there."[54] Alexa Roberts expressed a similar sentiment:

> [N]ow that it's a park and most of the long-time people are retiring or a lot of the tribal representatives have passed on and some of our subject matter experts—that group has kind of disbanded . . . the last threads of people who have been through this evolution and kind of understood its core principles I guess are moving on, like people do. And it'll be replaced by—staff will get

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[50] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 6–27, SAND Electronic Records.

[51] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[52] Alexa Roberts and Karl Zimmermann, "Letter to the Editor-Roberts and Zimmerman," *Kiowa County Independent,* April 3, 2019, https://kiowacountyindependent.com/news/1553-letter-to-the-editor-roberts-and-zimmerman.

[53] National Park Service, *State of the Park Report,* 2017, viii; Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021; Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

[54] Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021.

> replaced by people who don't have that depth of connection to it. It's a regular park, the rules of the Park Service priorities . . . and what I can only think of as like the administrative umbrella, has changed a lot in the time that we've been here. It'll become a regular park. It'll operate like a conventional—like a national historic site does.[55]

Roberts worried about what would be lost in the process of the park turning into a "conventional" national historic site. These staff members held deep personal convictions about respecting the tribes and demonstrated meaningful involvement and deep care for the site and its story. Their efforts have set high standards for future stewards of Sand Creek Massacre National Historic Site.

Cooperative Agreements

The establishment of cooperative agreements between the National Park Service and the tribes has been essential in prioritizing tribal rights, access, and involvement with managing the sites. These agreements outline the responsibilities of each party to fulfill the authorizing legislation and commit to collaboration and communication for the care of the site and its story. While the authorizing legislation identifies three tribal governments (the Cheyenne and Arapaho Tribes of Oklahoma, Northern Cheyenne Tribe, and Northern Arapaho Tribe),[56] there are actually four tribes that the site interacts with. The Cheyenne and Arapaho Tribes of Oklahoma are federally recognized together; however, this federal recognition is made up of the Southern Cheyenne and Southern Arapaho tribes.[57] Thus, the four tribes with interest in Sand Creek Massacre National Historic Site are the Northern Cheyenne Tribe (Montana), Northern Arapaho Tribe (Wyoming), Southern Cheyenne Tribe, and Southern Arapaho Tribe.[58]

The cooperative agreements are renewed annually with the three federally recognized tribes, and these agreements allow for the transfer of funds from the site to the tribes for expenses related to consultation. The use of these funds and travel arrangements are left up to the tribes to manage. The cooperative agreements additionally establish that the tribes designate their official representatives and allow for government-to-government consultation. These cooperative agreements are described in greater detail in Chapter Three.

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[55] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[56] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[57] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18-19, 2021.

[58] "Home," Northern Cheyenne Tribe, 2013, https://www.cheyennenation.com/; "Home," Northern Arapaho Tribe, 2021, https://northernarapaho.com/; "Home," Cheyenne and Arapaho Tribes, 2021, https://cheyenneandarapaho-nsn.gov.

Additionally, Sand Creek Massacre National Historic Site is legislatively mandated to cooperate with the State of Colorado, taking the form of cooperation with History Colorado (formerly the Colorado Historical Society).[59] History Colorado consults with the same tribal representatives that have been officially designated by each tribe to consult with Sand Creek Massacre NHS. The State's relationship with the tribes, however, is not governed by the enabling legislation for Sand Creek Massacre, and Karen Wilde questioned whether their use of these lists is appropriate:

> My point of view, as a native, this is going on record, that they should ask each tribe themselves . . . who are they going to work with. It's been this way since I've been here about who they work with the same tribal reps. Some of them probably would be the same tribal reps, but I think it's more beneficial and more respectful to have an official letter or a resolution from the tribe to do that—for each entity that works with the tribe."[60]

In short, Wilde suggested that History Colorado should develop its own unique list of official tribal representatives and follow the laws and procedures in place for them to engage with tribal officials.

Volunteer Program

Volunteers have played a vital role in a variety of park programs, from interpretation to visitor services and natural resources management. These volunteers have been mostly retirees from the local community. During the years covered in this study, the program was not formalized with a dedicated volunteer coordinator. Yet their contributions have been essential since the park's opening, given the small park staff and the special events that NPS has sponsored or supported at the site over the years.

At the start of the 2007 calendar year, Sand Creek Massacre NHS had only one full-time employee, Craig Moore, for interpretive programming and most visitor services.[61] Alexa Roberts submitted a Project Management Information System (PMIS) funding request in January 2007 for a volunteer program to support the site's interim management goals; augment the management of the site; and improve and expand visitor services, hours of operation, access, and security. NPS site managers anticipated three to five special events per year with an estimated attendance of over 5,000 visitors, including the establishment ceremony in April 2007 (PMIS #131927).

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[59] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[60] *Sand Creek Massacre National Historic Site Establishment Act of 2000,* Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023; Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[61] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #131927. Accessed February 17, 2021.

The project was funded for $900, and these funds were anticipated to support approximately 15 to 20 youth volunteers drawn from the local community. Most of the volunteer work was expected to take place on site and included giving talks and tours, and developing interpretive text and media, such as waysides and printed literature. Volunteers were also expected to assist in well monitoring, baseline surveys, butterfly monitoring, fire reduction work, security, safety, and maintenance including work on trails and parking. Finally, volunteers were expected to assist with web design, public relations, natural resources, archival and library programs and research, updating newspaper tribal decedent records, scrapbooking, special event planning, and completing visitor use surveys.[62]

Volunteers helped with the 2007 dedication ceremony, the 150th commemoration in 2014, and on special archeological survey projects.[63] Volunteers, such as Jeff C. Campbell, also compiled information for a historic interpreter's packet for interpretive staff at Sand Creek Massacre NHS and Bent's Old Fort NHS.[64] Campbell contributed hundreds of hours as a volunteer park guide and researcher and was awarded the Intermountain Region 2020 George and Helen Hartzog Award for Enduring Service.[65]
The *Interpretation and Education Operations Review* from 2014 noted that Sand Creek Massacre NHS did not have an established Volunteer in Parks (VIP) program. The number of volunteers at the site has, furthermore, been low (between 0 and 1) with the exception of a group of volunteers in 2011 from Groundwork Denver. The interpretation and education review included a recommendation to install a trailer pad at the site to increase volunteers, and the audit identified needs and other work that could be accomplished by volunteers.[66]

Management Planning

Between 2007 and 2017, Sand Creek Massacre National Historic Site developed several key planning documents in partnership with the NPS Intermountain Region (IMR) office, Denver Service Center, and other NPS offices, along with tribes and external partners. These documents provided direction for the management of resources and guidance for interpretation and site development. Some of the most important planning documents include the *Interim Site Management Plan* (2006), *General Management Plan* (2015), and *Foundation Document* (2017), which are summarized below. Between completion of the

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[62] Project Management Information System (PMIS) #131927.

[63] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[64] Jeff C. Campbell, *Sand Creek Massacre National Historic Site: Historic Interpreter's Packet*, National Park Service, 2008, SAND Electronic Records.

[65] "Sand Creek Massacre National Historic Site announces service award for Jeff Campbell," *Kiowa County Press*, September 26, 2021.

[66] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 42–43, SAND Electronic Records.

General Management Plan and *Foundation Document*, the site acquired additional property (Section 36), which is also discussed as it was an important addition to the management of the site.

The site's authorizing legislation includes a timeline for establishing a management plan no later than 5 years after the date on which funds are made available.[67] A general management plan is the standard comprehensive management plan for a unit of the national park system. However, due in part to their comprehensive scope and other factors such as funding, general management plans typically require several years (and sometimes more) to complete. Sand Creek Massacre National Historic Site therefore worked closely with the NPS Intermountain Region to develop an interim site management plan prior to initiating a general management plan. This interim plan, completed in 2006, was intended to provide essential guidance for management decisions during the early years of the new national historic site until a general management plan could be initiated and completed.[68] After the site was established in April 2007, the site moved forward with creating a general management plan, which was completed in 2014 and published in 2015. Planning, project management, and document production services were provided by the Denver Service Center. [69] The final product took a bit longer than 5 years to complete because of funding constraints and complex and political subjects, including land acquisition.[70]

Interim Site Management Plan (2006–2015)

Prior to the opening of Sand Creek Massacre National Historic Site in 2007, research and planning by NPS staff led to the creation of an interim site management plan and environmental assessment. This guided site management decisions until staff could prepare a long-term general management plan. The interim site management plan, completed in April 2006, was comprised of two alternatives: to adopt an interim site management plan (called the "preferred alternative") or to not adopt the plan (called the "no-action alternative"). Prior to implementation of the plan, a number of management activities had been

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[67] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[68] National Park Service, *Interim Site Management Plan/Environmental Assessment,* 2006; "Prepared Statement of Paul Hoffman, Deputy Assistant Secretary, Fish and Wildlife and Parks, Department of the Interior regarding S. 1672, S. 1789, H.R. 1616, S. 2167, and S. 2173," Hearing Before the Subcommittee on National Parks of the Committee on Energy and Natural Resources, United States Senate. 108th Congress, Second Session [testimony of Paul Hoffman] on S. 1672, S. 1789, S. 2167, S. 2173, and H.R. 1616. (S. HRG. 108–626), https://www.govinfo.gov/content/pkg/CHRG-108shrg96145/html/CHRG-108shrg96145.htm; National Park Service, *Finding of No Significant Impact: Interim Site Management Plan,* 2007, 1.

[69] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #108787.

[70] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History*, by Ari Kelman. Draft, 2016, 86–102; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 6. A general management plan was a requirement of the authorizing legislation of the site in 2000. The site was not established until 2007, at which point the site began working on a general management plan. Details of the delays can be found in PMIS entry #108787.

established and implemented with the assistance of partnerships and cooperative agreements, such as law enforcement and fire suppression support from Kiowa County.[71] Though these partnerships and cooperative agreements continued, the need for them was brought together in the interim site management plan. The NPS sent a letter to the Colorado state historic preservation officer (SHPO) requesting concurrence on the determination of *no adverse effect* to historic properties from implementation of the interim site management plan; the Colorado SHPO concurred with this determination on March 5, 2007. Director of the Intermountain Region Michael D. Snyder signed a Finding of No Significant Impact (FONSI) for implementation of the interim site management plan on June 12, 2007.[72]

The interim site management plan addressed the near-term needs for the site's grand opening events in 2007, including questions of visitor use, NPS management and development of the site, resource protection, and tribal access and activities. It sought to meet objectives set forth by earlier studies that led to the establishment of the site, as well as the enabling legislation for the site. The plan identified impact topics and described their baseline conditions for analysis of potential impacts. The broad topics included cultural landscapes, ethnographic resources, visitor use and experience, and site operations. In general, the interim site management plan prioritized resource protection over visitor experience to ensure site resources would be preserved for future planning opportunities. It sought to keep facility construction and infrastructure improvements to a minimum to support site staff and the public as needed.[73]

The interim site management plan also identified the park's fundamental resources and values (FRVs), which are features, systems, processes, experiences, stories, scenes, sounds, smells, or other attributes that warrant primary consideration during planning and management processes because they are essential to achieve the purpose of the park and maintain its significance.[74] The plan identified several FRVs, including the following:

- Artifacts and other physical remains
- Topographic features such as the bluffs
- Big Sandy Creek
- Viewsheds
- The cultural landscape as it appeared at the time of the Sand Creek Massacre

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[71] National Park Service, *Interim Site Management Plan/Environmental Assessment,* 2006, 41–58; National Park Service, *Finding of No Significant Impact: Interim Site Management Plan,* 2007, 1. The FONSI states that the reports were completed in April 2007.

[72] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 94; National Park Service, *Finding of No Significant Impact: Interim Site Management Plan*, 2007, 6.

[73] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 42–51; National Park Service, *Finding of No Significant Impact: Interim Site Management Plan*, 2007, 1–2.

[74] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 7.

- Oral histories, cultural and natural resources encompassed in the 2001 National Register of Historic Places boundary
- Period trees and culturally significant plant and animal species
- The planned repatriation site
- Tribal ceremonial areas
- Intangible spiritual qualities of the landscape (sense of place)
- Remains of individuals still in the ground and those that have been repatriated from museums
- Spiritual Healing Runs and other commemorative activities
- Memorialization[75]

This list of FRVs is similar, though not identical, to the FRVs identified later in the 2015 *General Management Plan* and the 2017 *Foundation Document*.[76]

The interim site management plan's no-action alternative consisted of limited visitor opportunities wherein the public would have to arrange ahead of time to visit the site. No infrastructure, such as visitor contact facilities, trails, signs/waysides, roadway improvements, parking, or utilities (e.g., sewer), would be scheduled for installation or construction. Interpretation under the no-action alternative would have been minimal and limited to handouts and brochures. Tours would have been limited to an as-needed basis. NPS administrative offices would have remained in Eads, and no temporary modular building would have been installed at the site. Adaptive reuse of the Dawson Ranch structures would not have taken place. There would have been no acquisition of additional lands or fencing modification, and maintenance of the site would have been minimal. Finally, tribes would have had continued access to the site for cultural and historical observance, including healing runs; however, a repatriation site would not be designated, nor would a building be designated for tribal storage.[77]

The preferred alternative of initiating the site management plan included temporary and fully reversible development-related activities in three distinct areas of the site: the former Dawson Ranch area, near the overlook that contains the existing stone monument installed in 1950, and along former ranch roads.

The interim site plan included development details focused on addressing the near-term needs to accommodate visitor use, NPS resource management, and tribal access and activities prior to the park dedication and opening to the public. These details include the following:

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[75] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 5.

[76] One notable distinction is that the 2017 *Foundation Document* explicitly identifies "Place of Healing" as an FRV. It says, "The national historic site creates an environment conducive to opportunities for healing for tribal members and descendants of those who were in the village and those killed in the attack." National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 7.

[77] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 41–42.

- **Public Access**—opening the park unit to the public, constructing a temporary on-site visitor contact station, installing toilets, developing two pedestrian trails, erecting signage, acquiring adjacent state land and constructing an overlook, and improving roads and parking.
- **National Park Service Management**—constructing a temporary on-site park support services building to hold a few employee offices (to double as the visitor contact station), re-using existing buildings for maintenance and storage purposes, and installing utilities.
- **Tribal Activities**—continued use of the site for ceremonies, relocating the existing 1950 stone monument and erecting a new one, designating a cemetery (repatriation site), and re-using existing buildings on site for tribal storage.[78]

The *Interim Site Management Plan/Environmental Assessment* was developed by Sand Creek Massacre NHS Superintendent Alexa Roberts, Bent's Old Fort NHS Park Ranger Karl Zimmermann, and three staff from the NPS Intermountain Region Support Office: NEPA/106 Specialist Cheryl Eckhardt, Architect Lisa Haddox, and Landscape Architect Suzy Stutzman. Internal scoping for the plan occurred in September 2006 and included an interdisciplinary team of NPS employees, tribal representatives, the Colorado SHPO, and local representatives from Kiowa County. External scoping with the public also occurred, and the majority of commenters were in favor of the interim site management plan. Many of the suggestions from the external scoping had already been incorporated into the plan prior to public scoping. The Cheyenne and Arapaho Tribes were consulted before the public comment period and expressed support of the development of an interim site management plan.[79] These proposals guided site development and management leading through most of the 2007–2017 period. Some proposals were later refined in subsequent planning.

Sensitive Resource Area. The interim site management plan outlined tribal use including general access, ceremonies, and storage of materials. Tribes were consulted during the development of the plan, and important decisions were reached especially during the September 2006 internal scoping meeting. The meeting, which was a planning charrette rather than a formal consultation, included representatives from all of the tribes, the State of Colorado, the NPS, Kiowa County, Kiowa County Economic Development, and independent historians. Per the 2000 enabling legislation, tribal and descendant access was granted to anywhere within the boundaries of the site. During the September meeting, tribal representatives indicated that the entire Sand Creek drainage within the site boundary should be considered sacred and restricted from access by the general public, and also restricted from construction activities and visitor use.[80]

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[78] National Park Service, *Finding of No Significant Impact: Interim Site Management Plan*, 2007, 1.

[79] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 93–94.

[80] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 48–89.

Many of the official tribal representatives were concerned about impacts to sensitive resources caused by heavy use of the creek bed during the 2007 NHS dedication. During consultation in 2011 for the general management plan, the NPS and tribal representatives decided to restrict all access to and use of the creek bed due to its highly sensitive nature. This led to the development of the special resource area zoning in the general management plan. The site and tribal representatives agreed that to protect the resources in this highly sensitive area, there would be no public use nor any tribal use unless by special use permit.[81] In the development of the general management plan, the designation of the creek bed as a sensitive resource zone was incorporated only in alternative E, which was the alternative put forward by the tribal representatives that eventually became the preferred alternative.[82]

General Management Plan (2015–2017)

Staff continued their rigorous research and planning in the decade following the site's opening in 2007. Some planning activities, such as the 2011 *Resource Stewardship Strategy*, were completed and implemented quickly for natural and cultural resource protection. [83] These research activities included the environmental history of the site, species classifications, inventory and monitoring, natural processes and resources monitoring, fire monitoring, archeological assessments and surveys, scope of collections statement, and transportation planning. Other planning processes took much longer to complete, such as the *General Management Plan*, which is more comprehensive in scope and scale.

A general management plan establishes a comprehensive vision for the site's purpose, significance, and resource goals by clearly defining the desired natural and cultural resource conditions to be achieved and maintained over time; the necessary conditions for visitors to understand, enjoy, and appreciate the park's significant resources; and the kinds and levels of management activities, visitor use, and development that are appropriate for maintaining the desired conditions. A general management plan also identifies indicators and standards for maintaining the desired conditions. Ideally, a general management plan guides NPS site management for approximately 15 to 20 years, meaning that Sand Creek Massacre NHS would be due for an updated general management plan between 2030 and 2035.[84]

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[81] Alexa Roberts, Karen Wilde, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[82] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 90; Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[83] National Park Service, *Sand Creek Massacre National Historic Site: Resource Stewardship Strategy*, 2011.

[84] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 5; National Park Service, *National Park Service Management Policies: The Guide to Managing the National Park System*, 2006, 22–24.

Planning for the general management plan began in late 2006 and early 2007; however, management's decisions continued to be guided by the interim site management plan and environmental assessment discussed above.[85] By 2008, site staff met with official tribal representatives in Denver to discuss the preparation of the general management plan.[86] Management initially struggled to secure funding for the general management plan, which was finally secured in FY 2009 through Unit Management Plans (PMIS #108787). In subsequent years, later components of this project were defunded or underfunded. The Denver Service Center, under direction of project manager Tom Thomas, led the general management planning efforts, with the planning document and environmental assessment completed in 2015.[87]

Figure 2: A planning meeting for Sand Creek Massacre National Historic Site's general management plan in 2008. Park Ranger Craig Moore looks toward the site of the massacre and the future Bluff Trail area. The other ranger pictured in the foreground is Karl Zimmermann.
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

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[85] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006; National Park Service, *Finding of No Significant Impact: Interim Site Management Plan*, 2007, 1–3.

[86] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[87] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, i.; Shawn Gillette, "General Management Plan for Sand Creek Massacre NHS Prepared for Public Review," last modified June 8, 2015, https://www.nps.gov/sand/learn/news/general-management-plan-for-sand-creek-massacre-nhs-prepared-for-public-review.htm.

The *General Management Plan* reaffirms the site's significance and purpose, identifies fundamental resources and values as well as other important resources and values, and identifies special mandates and service-wide laws and policies guiding management. These foundational elements were developed through feedback solicited from federal, state, local, and tribal officials, tribal members, and the general public. During the initial stages of planning, the NPS planning team solicited input pertaining to the following four themes:

- What is the appropriate level of development at the site?
- What is the appropriate level of visitor access?
- How can the National Park Service best provide tribal access for traditional, cultural, or historical observances?
- What are the best ways to inform visitors about the history and significance of the site?

The *General Management Plan* notes that, due to the extreme sensitivity of the historical events at the site and the need to interpret tribal oral history and the voices of the descendants respectfully, interpretive themes would be developed in a separate consultation process.[88] Completion of the *General Management Plan* was extremely important to site staff and tribal leaders and provided answers to the fundamental questions of "What is appropriate?" and "How do we do this?"[89]

The tribal consultation process was collaborative and extensive for the *General Management Plan*, with comments being submitted by the tribes through calls and face-to-face meetings rather than through formal correspondence. A complete description of the consultation process can be found in Chapter 5 of the *General Management Plan*.[90] By September 2008, there was an initial management alternatives workshop held in Eads with members from Colorado Historical Society, Kiowa County, and all the Sand Creek Massacre tribal communities.[91] In December 2011—after the four draft management alternatives were distributed for review and public meetings held—a workshop was conducted in Billings, Montana, close to the Northern Cheyenne Tribe.[92] Representatives from

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[88] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 17–18.

[89] Alexa Roberts and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[90] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 183–188.

[91] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 185; Alden Miller, Superintendent Sand Creek Massacre National Historic Site, letter to Chairman Addison and Business Council Membership, September 18, 2008; and Alden Miller, Superintendent Sand Creek Massacre National Historic Site, letter to Workshop Attendees, October 22, 2008. The letters have been combined into one file and represent various letters from the site to stakeholders for the general management plan workshops (2007–2008).

[92] The NPS rotated consultations for the general management plan in areas close to each of the tribes, to give tribal representatives the best opportunity to comment on the plan.

the NPS; State of Colorado; and Northern Arapaho, Northern Cheyenne, and Southern Arapaho/Southern Cheyenne Tribes gathered to select a preferred alternative for the *General Management Plan*.[93]

During this workshop, tribal representatives brought up concerns with the draft management alternatives, including the installation of trail along the Chivington Canal berm on the north side of the creek. Tribal representatives voiced opposition to the trail because of the highly sensitive nature of the area, and they did not want visitors to be able to watch them pray or conduct other ceremonies. Another topic of discussion included appropriate access to the creek bed itself given the sensitivity of the site and resources in this area. Some representatives voiced concerns about the use of the creek bed during the site's dedication in 2007 and suggested restricting all access to and use of the creek bed due to its highly sensitive nature.[94]

A fifth management alternative, alternative E (chosen as the preferred alternative), was put forward by Otto Braided Hair, tribal representative for the Northern Cheyenne Tribe.[95] Five management zones were developed in the preferred alternative: a resource protection zone, a contemplative zone, a learning zone, a development zone, and a sensitive resource zone. While the other management zones were features of the draft alternatives, the sensitive resource zone is only used in the preferred alternative. The sensitive resource zone was designated to provide the highest level of protection for highly sensitive or at-risk cultural and natural resources. The zone was identified through the strong ethnographic association with the resources in the zone, and features of the 1864 ethnographic landscape. The preferred alternative restricts *all* use of the sensitive resource zone. Anyone can request a special use permit for access to an otherwise restricted area, and it is at the park's discretion to issue one based on whether the requested activity is in line with the park's legislated purpose. Reproductions of Cheyenne and Arapaho lodges, which are consistent with the ethnographic landscape, could be placed in this zone. The NPS additionally minimizes their operations within the sensitive resource area, and no facilities for administrative or visitor use are allowed in this zone. Primitive roads for NPS administrative use were allowed to remain.[96]

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[93] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 186.

[94] Alexa Roberts, Karen Wilde, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[95] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 89–94.

[96] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 63–64; Alexa Roberts, Karen Wilde, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

While the sensitive resource zone was the only feature of the preferred alternative to limit access and use, a contemplative zone was drafted in each management alternative for public and tribal use. The contemplative zone is located in two areas of the preferred alternative—at Monument Hill and east of the developed administrative area near the sensitive resource area. The primary purpose of this zone is to provide opportunities for quiet contemplation, healing activities, and traditional tribal observances. Facilities in this zone could include a sheltered seating area, limited interpretive media and trails with unobtrusive informational signs, and appropriate commemorative features. Natural and cultural resources were to be managed to support the contemplative experience.[97] The idea for a contemplative area grew out of Chief Laird Cometsevah's (Southern Cheyenne, Cheyenne and Arapaho Tribes, Oklahoma) idea of having a 100-acre area, divided into four quadrants—one for each tribe's use—with a tribal community building in the center. [98] Otto Braided Hair said that the area was intended to provide "some distance and some solitude." That was "one of the bigger requirements that the elders wanted. They wanted tribes to have an area where they could experience some solitude and quiet."[99]

This fifth management alternative, Alternative E, was chosen as the preferred alternative through a "choosing by advantages" process.[100] Alternative E offered the greatest focus on resource preservation, combined with opportunities for contemplation and memorialization, interpretive programs, and visitor access to the site.[101] In short, the preferred alternative satisfied both the tribes' and the NPS's desires. Since completion of the *General Management Plan*, the National Park Service has worked to implement the preferred alternative. Of the major management actions and strategies set forth in the *General Management Plan*, only the establishment of the contemplative area has yet to be implemented (at the time of this report's writing).[102]

Otto Braided Hair recalled that the goal of the preferred alternative was:

> It was minimal, minimal development. Minimal impacts on the viewsheds, noise, all that [was] taken into consideration. . . . And that was the challenge, you know, because most construction locations or projects, you don't really

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[97] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 64, 89–92.

[98] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 90; Alexa Roberts, Karen Wilde, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[99] Otto Braided Hair, interview with Angela Sirna, February 9, 2023.

[100] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 90; Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[101] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 89–94.

[102] Alexa Roberts, Karen Wilde, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

> have that kind of, always think about like an impediment, limiting, something limiting. Oh, you do. And you only usually have so much space to work with. But we, our sensitivity was a little deeper. Because we looked at it from kind of a sacred site, spiritual, spirituality, and from that kind of a lens. Instead of like an architect, totally different.[103]

Braided Hair said the tribal representatives took their time and collectively worked through differing opinions on the alternative. He did not feel like the NPS pressured them to move more quickly. Looking back on the process and its outcomes, he felt like the tribes' goals had, for the most part, been achieved at Sand Creek Massacre National Historic Site.

As part of the general management planning process, compliance with the National Environmental Policy Act (NEPA) and Section 106 of the National Historic Preservation Act (NHPA) occur at a high level. As specific proposals are implemented, NEPA and NHPA compliance are typically the responsibility of site staff. A great deal of NEPA and NHPA compliance had taken place for many of the elements of the preferred alternative throughout the entire site development process between 2002 and 2015. However, although there was an individual from the State Historic Preservation Office on the *General Management Plan* team, the NPS did not consult with the Colorado State Historic Preservation Offices (History Colorado) for NHPA or NEPA compliance at a level required for implementation of specific proposals. Nor was a programmatic agreement created as part of the environmental assessment for the general management plan. One reason for this oversight was that the site lacked a Section 106 coordinator to participate in the general management planning process. This misunderstanding regarding level of compliance for the general management plan and specific proposals contained therein was a lesson in communication for site staff.[104]

It was only at the end of the general management planning, and the start of Cynthia Wiley's employment as curator in 2015, that the NHPA and NEPA consultation omission was discovered. There had been approximately a 2-year gap between the tenure of the previous Section 106 coordinator for the site, Rhonda Brewer, and the beginning of Wiley's position. Templated language was inserted into the *General Management Plan*, showing the Colorado Historical Society (now called History Colorado) was a partner in the *General Management Plan*, but there was no language regarding an assessment of effect for the preferred alternative, alternative E.[105] While minor elements of the preferred alternative had been implemented before the *General Management Plan* was formally finalized, the compliance omission was discovered before specific projects began and the omission was

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[103] Otto Braided Hair, interview with Angela Sirna, February 9, 2023.

[104] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[105] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 188.

corrected.[106] Site managers expressed regret that the NHPA and NEPA compliance for specific proposals was not complete during the general management planning process, since the subsequent project-specific compliance was a challenge for site staff who had limited time and resources.[107] Karl Zimmermann noted, "every time we said 'we want to build a trail,' or 'we want to put in a restroom,' or 'we want to put in the water line,' each one of those required a separate 106 and NEPA. Where we could have done it in one thing. So it put burdens on us, and it put a lot, I mean, just a tremendous amount of burden on Cynthia [Wiley], the cultural people, and so on."[108]

Alexa Roberts pointed to the *General Management Plan* as a "perfect example" of the site's approach to working with the tribes. In the 2011 meeting to discuss the preferred alternatives,

> the tribal representatives, they just plunged right in and we went back and forth about this and that, there were some things that we proposed they didn't like, they kind of caucused a little bit and said "okay, this is how we see it"—and it's like "great, it's perfect." So we weren't arguing. . . . [I]t wasn't a matter of "sure, whatever you say goes." There's been some things that we weren't able to do. When we said we weren't able to do [them], they knew it was because we're not able to do them—not because we just had a better idea or we didn't want to do it that way. We took their input as that's why we're asking, otherwise what's the purpose?[109]

NPS staff continued to build trust with the tribes by working closely with the tribal representatives and being honest and open with them throughout the general management plan planning process.

Boundary Addition: Section 36 (2015)

Since the site's establishment, the NPS has sought to acquire additional lands within the authorized boundary from willing sellers to protect resources associated with the Sand Creek massacre and tell a more complete story. The 2000 enabling legislation authorized a boundary with approximately 12,480 acres for the site.[110] By the time the site opened to the public in 2007, the established or jurisdictional boundary for the site had been refined to 12,583 acres, and the established boundary consisted of 2,385 acres. Of these 2,385 acres, the NPS owned 920 acres and held 1,465 acres in tribal trust. These tribal trust lands are

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[106] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021, at Sand Creek Massacre National Historic Site.

[107] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[108] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[109] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[110] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000, 2019–2023.

owned by the United States and held in trust for the Cheyenne and Arapaho Tribes, to be managed by the National Park Service in keeping with the purposes of the authorizing legislation.[111] After the approval of the *General Management Plan* in 2015, the NPS acquired an additional 640 acres from the State (Section 36). This acquisition increased federal landholdings to 3,025 acres.[112] The rest of the landholdings within the authorized boundary are held by private landowners. While these are the bare facts, as Roberts noted, the importance of Section 36 to the site and the process that the acquisition took was not simple or quick.[113]

Section 36 of Township 17 South, Range 46 West is adjacent and west of Section 31 of Township 17 South, Range 45 West and was identified early on by management as a priority for acquisition because the tract lays in the path that the Army followed to the massacre site.[114] In Alden Miller's 2008 briefing to Washington DC, he noted that the site was working with the State of Colorado to acquire Section 36.[115] Other site correspondence indicates that in 2009 there was interest in acquiring the Mace-Vice Trust property, the Tonso property, and property owned by the Dixons; however, the landowners were not interested in selling to the National Park Service.[116]

By 2011, the NPS sought to acquire an additional 680 acres of land (in two tracts) to protect cultural and archeological resources. All of the parcels that the NPS sought to acquire were within the boundary authorized for acquisition by the 2000 enabling legislation, which mandated that all acquisitions of private property be on a willing-seller basis only. One of these tracts was Section 12 (T17S R46W), identified as Tract 101-02 on NPS land ownership maps. This tract was privately owned and enrolled in the United States Department of Agriculture (USDA) Farm Service Agency's Conservation Reserve Program (CRP). In exchange for a yearly rental payment, farmers enrolled in the CRP program agree to remove environmentally sensitive land from agricultural production and plant species

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[111] *Sand Creek Massacre National Historic Site Trust Act of 2005*, Public Law 109-45, https://www.congress.gov/109/plaws/publ45/PLAW-109publ45.pdf; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 112.

[112] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 4; Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 8–12; US Department of the Interior. Budget Justifications and Performance Information, Fiscal Year 2018, National Park Service. https://www.nps.gov/aboutus/upload/FY-2018-NPS-Greenbook.pdf. Accessed October 12, 2023, ONPS-Summaries-32.

[113] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[114] Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 5-6, and 16-17; Alden Miller, "Sand Creek Massacre National Historic Site Briefing to Senator Ken Salazar, Senator Wayne Allard, Rep. Marilyn Musgrave," February 1, 2008, 1; US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2014, National Park Service*. http://npshistory.com/publications/management/greenbook/2014.pdf. Accessed October 12, 2023, LASA-28.

[115] Alden Miller, "Sand Creek Massacre National Historic Site Briefing to Senator Ken Salazar, Senator Wayne Allard, Rep. Marilyn Musgrave," February 1, 2008, 1.

[116] Christine Quinlan, email to Alden Miller, Alexa Roberts, and Janet Frederick, Sand Creek Massacre National Historic Site, June 24, 2009.

that will improve environmental health and quality. The long-term goal of the program is to re-establish valuable land cover to help improve water quality, prevent soil erosion, and reduce loss of wildlife habitat. Contracts for land enrolled in CRP are 10 to 15 years long.[117] The status of Section 12 in the program was set to expire in FY 2010 and was renewed through 2020. The other tract, 101-08, was composed of 40 privately owned acres and was an integral part of the massacre site. Protection of the massacre site within Section 24 (T176S R46W) was strongly supported at all levels since site managers made it clear that acquisition efforts were entirely on a willing-seller basis. There was also no effort to interfere with land uses established by private landowners within the authorized boundaries.[118] Acquisition of these properties, however, did not occur at that time.

In 2014, site leadership again requested funds from The Conservation Fund, a nonprofit conservation organization, to acquire the high priority Section 36. According to the budget justifications in the FY 2014 Greenbook, no maintenance costs were associated with the potential acquisition and the tract would remain undeveloped to protect the cultural resources, landscape, viewshed, and natural resources. Possible uses included nature viewing opportunities, trail use, and contemplation of the massacre events.[119] The National Park Service was not able to acquire this property at the time as evidenced by future requests and acreage recorded through 2015 in subsequent NPS Greenbook publications (FY 2012–FY 2017).

The site requested funds in fiscal year 2015 to acquire three tracts totaling 4,077.91 acres within the authorized boundary. One tract (2,772.89 acres) was the largest contiguous block of privately owned land and was made up of Sections 17, 18, 19, and 20 in T17S R45W and one-quarter of Section 24, collectively identified as Tract 101-09. This tract was where many of the massacre-related artifacts were found during research in 1999, proving the location of the massacre and leading to the establishment of the site. The second tract (665.02 acres) was Tract 101-14 (Section 31, T17S R45W). This parcel was just east of Section 36 and directly south and southeast of Monument Hill.[120] The third tract, Section 36 (Tract 101-13), was then owned by the State of Colorado.[121] This tract borders the access

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[117] "About the Conservation Reserve Program," Conservation Reserve Program, Farm Service Agency, US Department of Agriculture. Accessed August 18, 2021. https://www.fsa.usda.gov/programs-and-services/conservation-programs/conservation-reserve-program.

[118] US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2011, National Park Service*. http://npshistory.com/publications/management/greenbook/2011.pdf. Accessed October 12, 2023, LASA-35.

[119] US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2014, National Park Service*. http://npshistory.com/publications/management/greenbook/2014.pdf. Accessed October 12, 2023, LASA-28.

[120] US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2015, National Park Service*. http://npshistory.com/publications/management/greenbook/2015.pdf. Accessed October 12, 2023, LASA-74-75.

[121] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 61.

road and is the first section that visitors see when traveling north on Chief White Antelope Way to the site. The funding request noted that there were threats to the sites in the form of oil and gas development. Seismic testing for minerals was occurring on the Section 36 tract, and in December 1971, an oil well had been drilled and abandoned on the immediate northern boundary of the same tract. Discussions with the State of Colorado regarding mineral rights in the Code of Federal Regulations (CFR), Section 36 and 36, Part 9, Subpart B, had to be addressed prior to acquisition as development posed a threat to the resource; agricultural development additionally posed a threat to resources.[122]

The Colorado State Land Board retained ownership of Section 36 until October 2015 when the property was transferred to the National Park Service, under the authority of Colorado House Bill 10-1165.[123] The transfer of Section 36 to the National Park Service was announced during the start of the 2015 Spiritual Healing Run on November 29, 2015, by Colorado Governor John Hickenlooper.[124] On September 9, 2016, a boundary increase for the Sand Creek Massacre Site National Register listing was accepted; it included Section 36 and was included in the boundary authorized by the 2000 enabling legislation.[125] The revised NRHP listing increased the national register acreage from 7,680 acres to 8,116.828 acres.[126]

When the NPS acquired Section 36, the tract was in use for grazing. Grazing activity was allowed to continue until January 2022, when the current grazing lease expired. In September 2016, park staff started working with the Southern Plains Network to have a rangeland specialist, Dr. Fred Smeins of Texas A&M University, create grazing plans for both Sand Creek Massacre National Historic Site and Bent's Old Fort National Historic Site. When Smeins unexpectedly had to withdraw from the project, they began working with a group from the University of Oklahoma.[127] Management sought to determine

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[122] Alexa Roberts, "National Park Service Fact Sheet: Acquisition of State Land Trust Property from State of Colorado at Sand Creek Massacre National Historic Site (SAND)," April 28, 2014, SAND Electronic Records; US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2015, National Park Service*. http://npshistory.com/publications/management/greenbook/2015.pdf. Accessed October 12, 2023, LASA-74.

[123] Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 7-4, 8-10, 8-12.

[124] "Hickenlooper approves 640-acre land transfer to preserve Sand Creek history on anniversary," *Denver Post*, November 29, 2015, https://www.denverpost.com/2015/11/29/hickenlooper-approves-640-acre-land-transfer-to-preserve-sand-creek-history-on-anniversary.

[125] Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 1–6.

[126] Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, iii, 7-1, 8-24; Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 7-5 to 7-6.

[127] Details are from Janet Frederick in her comments on the first draft of this manuscript, November 2021. Frederick noted that the University of Oklahoma group completed some preliminary work, but they canceled the work in 2020 (outside the time period examined in this study) due to scheduling and staff issues. Both BEOL and SAND began working with the Regional Ecologist.

appropriate limitations on grazing while the lease was active. The limitation on grazing was set at 50 animal units per day. (One animal unit is equivalent to one adult cow with one calf.) No other areas of the site allow for grazing.[128]

By late 2016, site managers had installed an interpretive pull off and waysides on Section 36 along Chief White Antelope Way to orient visitors to the site, allow them to experience the viewshed that encompasses the entire massacre, and begin to learn about the events leading to the massacre events.[129] Installation of this pull off and these waysides are discussed further in Chapter Six on interpretation, Chapter Seven on visitor use and management, and Chapter Eight on integrated resource management.

Foundation Document (2017)

A site's foundation document describes the core mission of the NPS unit by identifying the purpose, the significance, the fundamental and other important resources and values, interpretive themes, special mandates and administrative commitments, and the unit's setting in a regional context. It also presents an assessment of planning and data needs that will guide future planning efforts for the park unit. In consultation with tribal representatives, the foundation document planning team developed seven significance statements that emphasized the significance of the site to the Cheyenne and Arapaho Tribes and situated the massacre in its historic context. Fundamental resources and values included the massacre site itself; the landscape; the museum and archival collections; and the site as a place of healing, commemoration, repatriation, and connection. The legacy of the massacre and call to prevent similar atrocities in the future was identified as another important resource and value. Twelve interpretive themes, some with subthemes, were developed.[130] According to site managers, the tribes were deeply involved in the development of these themes. The interpretive themes are pointed and specific and boldly state the key concepts visitors should know after visiting the site.[131] These interpretive themes are included in Chapter Six on interpretation.

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[128] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[129] Cynthia Wiley, interview with the Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service. *State of the Park Report,* 2017, 41; High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 13, SAND Electronic Records; Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, *State of the Park Report,* 2017, 41; Planning, Environment & Public Comment (PEPC) Project Search #68348, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 12, 2021.

[130] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 9–10.

[131] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 9; National Park Service. *State of the Park Report,* 2017, viii, 43–45; Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

The *Foundation Document* identified threats including visual and noise intrusions from energy development and overflights/commercial traffic; development on private property impacting buried cultural resources; climate change, air pollution, development causing a decline in resource availability, and invasive species; lack of curatorial storage and management plans; overdevelopment or commercialization of the site and general visitation during periods of tribal spiritual observances; potential for vandalism and removal of cultural objects; and loss of tribal descendants and tribal memory. Key issues identified included oil and gas leasing, landscape intrusions, loss of institutional knowledge, maintaining partner relationships, and meeting visitor expectations.[132] Since completion of the *Foundation Document*, administrative histories (including this one) have been undertaken to capture institutional knowledge regarding the early management of the site, and the rehabilitation for an off-site visitor center and research center have been completed.

Landscape Restoration

Since the site's enabling legislation emphasizes managing the cultural landscape "as closely as practicable" to how it looked in 1864, restoration of the cultural landscape has been a primary concern for site managers. [133] After a long history of ranch use, the natural resources did not reflect the prairie landscape that would have been present in 1864. These landscape restoration efforts are discussed in Chapter Eight on integrated resource management.

Facilities Improvement and Infrastructure

Visitor Use Area

In an effort to manage the cultural landscape as it looked in 1864, the NPS has kept development to a minimum. [134] Much of the development and modifications outlined in the interim site management plan focused on the former Dawson Ranch area. Because this ranch complex had already modified the landscape, it became the primary visitor and

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[132] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 32–33, SAND Electronic Records; Sand Creek Massacre National Historic Site, "Oil and Gas Development Potential Near and Within Sand Creek Massacre National Historic Site," March 2013, 1, SAND Electronic Records.

[133] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[134] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

administrative use area.[135] At the time of NPS acquisition, two single-lane, dirt-track ranch roads (one leading to the 1950 monument and one leading to the ranch area) and various ranch buildings were in place.[136] Access roads to the site were managed by Kiowa County, County Road 54—now Chief White Antelope Way—and County Road W.[137]

Although former ranch buildings occupied the site at the start of calendar year 2007, the site did not have functional facilities to accommodate public access. It lacked a visitor contact station, toilets or water facilities, parking or turnaround areas, kiosks, exhibits, and on-site staff to assist visitors. Immediate needs to improve the site for public visitation included creating or installing administrative offices for park personnel, utilities (e.g., septic, electrical, natural gas, telephones), public restrooms, and an information kiosk or visitor contact station. The site also needed improvements to the dirt access road maintained by Kiowa County and a parking area. In a 2007 briefing report to the Washington Support Office (WASO), Roberts noted that they could accommodate minor facilities development within the site's base budget, but funding for other development needs—an estimated $750,000 worth—would need to come from elsewhere.[138] This estimate did not include access road and parking area improvements.

The former Dawson Ranch was surveyed to obtain a determination of eligibility for the National Register of Historic Places for the ranch complex within the historic context of ranching in southern Colorado. The resources were determined to be not eligible. The survey also identified a "tourist cabin," an unpaved air landing strip, a boxcar used for storage, and a corral, all parts of the ranch complex, which were not part of the national register nomination.[139] A line camp archeological site located at a distance from the Dawson Ranch complex was also determined to be ineligible for the National Register; it was further explored in the 2005 archeological survey for the repatriation area.[140] Some former ranch buildings were identified for demolition and others for adaptive reuse.[141]

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[135] Jacqui Ainley-Conley, *Final Report: Dawson Ranch Building Complex Survey,* National Park Service, 2005, SAND Electronic Records; National Park Service, *Interim Site Management Plan/Environmental Assessment,* 2006, 18, 42–51; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7-21; National Park Service*,* Intermountain Cultural Resources Management Archeology Program, *Archeological Investigations at Sand Creek Massacre National Historic Site October 12–13, 2005,* by Cynthia L. Herhahn and Janet D. Orcutt, 2015, 5, SAND Electronic Records.

[136] Jacqui Ainley-Conley, Final Report: Dawson Ranch Building Complex Survey. National Park Service. 2005, 16–18; National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 13; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 2001, 7-4, 7-21 to 7-22.

[137] National Park Service, *Sand Creek Massacre Project, Volume Two: Special Resource Study*, 2000.

[138] Alexa Roberts, "WASO Briefing FY07, Sand Creek Massacre National Historic Site," January 15, 2007, 2.

[139] Jacqui Ainley-Conley, *Final Report: Dawson Ranch Building Complex Survey,* National Park Service, 2005, 1, 16–18.

[140] National Park Service*,* "Intermountain Cultural Resources Management Archeology Program," *Archeological Investigations at Sand Creek Massacre National Historic Site October 12–13, 2005,* by Cynthia L. Herhahn and Janet D. Orcutt, 2015, 6.

[141] National Park Service, *State of the Park Report*, 2017, 41–42; National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 48.

When discussing which former ranch structures to remove or reuse, site managers considered the site's cultural landscape and viewshed, especially the viewshed from Monument Hill. From Monument Hill, staff surveyed a triangular viewshed toward the former ranch area. Trees planted around the former ranch obscured many of the ranch's structures from Monument Hill. Site managers developed the current visitor use and operations area with this in mind.[142]

The ranch home, built in 1951, was demolished in 2006. The former ranch shop, built in the 1970s, was rehabilitated to serve as the site's maintenance shop, conference room, and potable water treatment facility. Within the obscured viewshed, site managers installed a temporary 800-square-foot modular building to serve as administrative offices, a visitor contact station, and a site bookstore. Two vault toilets and a tornado shelter were installed in this area, and a modest visitor use area with tables was created. Parking areas were designated, and some of the former ranch roads were improved and others were closed off and revegetated. Finally, basic utilities such as electrical and telephone/computer lines were installed at the site.[143] Before installation of this telephone line, there was a single phone line with no voicemail or answering service at Bent's Old Fort that had been allotted to Sand Creek Massacre staff for emergencies. Due to limited cell-phone service at the site and without the phone and computer systems, Sand Creek Massacre staff were completely isolated when on site.[144] The telecommunication lines project connected the modular office at Sand Creek Massacre NHS, maintenance shop, weather station, and administrative offices in Eads and allowed for communications growth over the next 15 years.[145]

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[142] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[143] National Park Service, *State of the Park Report*, 2017, 36; National Park Service*, Interim Site Management Plan/Environmental Assessment*, 2006, 45–47.

[144] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #138676 and #143863.

[145] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #138676.

Figure 3: Modular building that serves as the administrative offices, a visitor contact station, and site bookstore for Sand Creek Massacre National Historic Site.
Photo by Tom Gibney, May 2021.

Site managers developed two pedestrian trails, erecting signs and waysides, and in 2015 acquired adjacent state land.[146] A loafing shed from the former ranch was demolished because it was not concealed by the planted trees, though some staff expressed support for keeping it. The area where the lean-to was located was re-seeded in 2009.[147] A temporary metal structure was erected between the vault toilets and the site's maintenance shop to conceal brightly colored farm equipment used for site maintenance. The metal structure, though temporary and removable, has been on site since 2019.[148] Cyclic maintenance funding has helped with the overall site maintenance, including improvements to the adaptively reused ranch structures and preservation of the cultural landscape.[149]

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[146] National Park Service, *State of the Park Report,* 2017, 41; National Park Service, *Interim Site Management Plan/Environmental Assessment,* 2006, 56–57; National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #138676.

[147] National Park Service, *State of the Park Report,* 2017, 38; Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[148] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[149] Karl Zimmermann, interview with the Denver Service Center, Eads, CO, May 18–19, 2021.

Site managers contracted the adaptive reuse for the former ranch shop until 2008, when funding ran out. Karl Zimmermann and SAND maintenance worker Durwood Miller finished the work themselves. The structure was gutted, and the metal roofing, interior insulation, skylighting, and roll-up doors were replaced to halt water and pest infiltration and eliminate safety issues. The contractor for the new skylighting was Morgan and Son of La Junta, Colorado.[150] A portion of the structure was made into a meeting room for on-site tribal consultation, and this room retains its meeting space function today. In 2009, the NPS contracted three tribal artists (one from each tribal government) to create paintings for this room. Two of the paintings were completed. In addition to these paintings, there are also interpretive and honorary panels with biographies of important tribal leaders. The research for these panels was completed by SAND park ranger Craig Moore in 2012.[151]

Figure 4: The maintenance shop at Sand Creek Massacre National Historic Site, which includes a meeting space. *Photo by Hillary Conley, May 2021.*

[150] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #134550.

[151] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Originally, the modular office planned for Sand Creek Massacre National Historic Site was located at Bent's Old Fort near the comfort station at the visitor parking lot and housed the site's bookstore. The modular office and location of the bookstore was intended to be temporary and because of this, the modular office was leased, not purchased. Bent's Old Fort later proposed to purchase the modular office and move it to Sand Creek Massacre National Historic Site. The costs to purchase and move the modular office were not found to be advantageous to the government. Instead, the NPS purchased a new modular building that was transported to the site in 2007 to serve as an interpretive space, visitor contact area, and administrative space.[152] This modular office was intended to be temporary despite its long presence at the site. The regional office has called for its removal in order to separate site administrative activities from visitor use activities. A separate contact station was proposed in the *General Management Plan*'s preferred alternative in a developed area of the site. [153] The proposed contact station is scheduled for installation in FY 2025.[154]

By 2015, site infrastructure included an improved ranch road, a small parking area in the developed administrative and visitor use area, and fencing surrounding the site. On-site structures included a maintenance shop and conference space, a modular unit that served as a temporary visitor contact station/office trailer, vault toilets, picnic tables, and a shade structure on Monument Hill. The site maintains a low level of development on site to preserve the natural landscape, consistent with the enabling legislation. [155] The reused ranch buildings and the modular office were painted by local contractors to match the surrounding landscape and lessen their visual intrusion in the viewshed. Additionally, cottonwood saplings were transplanted in 2016 from Bent's Old Fort NHS to Sand Creek Massacre NHS to shield the site's headquarters, visitor use area, and any future development from the visitor's viewshed on Monument Hill.[156]

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[152] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[153] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 89–93.

[154] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[155] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 10.

[156] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Planning, Environment & Public Comment (PEPC) Project Search #62178, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 2021.

Figure 5: Visitor use area at Sand Creek Massacre National Historic Site, May 2021.
Photo by Hillary Conley.

Monument Hill

Monument Hill, another major visitor area located on a bluff overlooking the creek bed, provides views of the landscape. The area gets its name from the historic marker placed by area civic groups in 1950. Monument Hill is connected to the visitor use and administrative areas by an interpretive pedestrian trail, though site managers have made efforts to obscure the trail, interpretive waysides, and visitor use area so they do not intrude upon the viewshed from Monument Hill. Moderate development has occurred near Monument Hill, and while some have occurred between 2007 and 2017 (e.g., the installation of the Bluff Trail and the repatriation area), other improvements were initially planned and designed during this period, but not installed until after 2017.[157] Staff members also hold interpretive talks and facilitate special event programming at Monument Hill.

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[157] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 19, 2021; Planning, Environment & Public Comment (PEPC) Project Search #66688, https://pepc.nps.gov/projectHome.cfm?projectId=66688. Accessed August 17, 2021; Scoping Trip Meeting Notes for "P17PS00698 - SAND – 210916 – Monument Hill – Parking, Roads and Trails, Sand Creek Massacre National Historic Site," March 10, 2017, Eads, CO, 1–4, SAND Electronic Records.

Figure 6: View of the landscape from Monument Hill, looking east.
Photo by Janet Frederick, 2021. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

The 1950 historic marker that gives the area its name had been a topic of discussion and debate since before the national historic site was established. The marker depicted an image of a male American Indian in a headdress with the inscription "Sand Creek Battle Ground Nov. 29 & 30, 1864." Placed by area civic groups in 1950, the marker illustrated the State of Colorado's persistent mischaracterization of the massacre as a battle.[158] Visitors, new tribal representatives, and new site staff regularly asked about the marker, and tribal representatives such as Otto Braided Hair expressed their desire to have the marker moved.[159] Despite these wishes, the NPS did not remove the marker until 2023 (outside the time period examined in this study). The marker was listed as noncontributing to the site's National Register nomination, likely because the nomination focused on the massacre site as it was archeologically defined and from primary source material—the marker was established at the site much later.[160] The marker was instead managed as a cultural resource by the site and was listed in the Historic Structures in the Cultural Resources Inventory System (HS-CRIS, formerly List of Classified Structures) database, but since 2007, the

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[158] Lysa Wegman-French and Christine Whitacre, *Interim Report No. 1: Historical Research on the Location of the Sand Creek Massacre Site,* http://npshistory.com/publications/sand/interim-rpt-1.pdf; Intermountain Support Office-Denver, National Park Service, 1998; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 17.

[159] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[160] Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7–22.

management category for the marker was "may be preserved or maintained."[161] The long management description for the marker noted that the marker was on land that the NPS holds "in trust" for the Northern Cheyenne, Northern Arapaho, and Cheyenne and Arapaho Tribes of Oklahoma. Additionally, during development of the interim site management plan, the record noted that a finding of "no adverse effect" was sent to the Colorado SHPO for the relocation and replacement of the marker.[162]

For several years, site management considered moving or removing the marker. Alexa Roberts indicated that the site's "unofficial guidance for a long time, until recently," was "don't erase history, interpret it."[163] The monument was therefore left in place as a visitor gathering location, and also for its potential educational value. Site managers considered installing interpretive text near the marker to explain its continued presence and the mischaracterization of the massacre (an alternative identified in the site's Long Ranger Interpretive Plan). It was also used by some as a location to place offerings for the ancestors, though visitors were encouraged to place these at the repatriation area.[164] Relocation of the existing 1950 historic marker was planned in the interim site management plan. The 2011 Sand Creek Massacre National Historic Site *Resource Stewardship Strategy* noted that the monument should be preserved in its current condition in order to provide an interpretive opportunity, illuminating how the State's interpretation of the Sand Creek Massacre has changed since the monument's establishment in the 1950s, when the Colorado Historical Society still described the massacre as a "battle." At the time, the tribes expressed their support to retain the wording on the marker during consultation for the strategy document.[165] In the intervening years, tribal perspectives on the marker changed. Whereas earlier tribal representatives (described by Otto Braided Hair as the "old guard") wanted to keep the marker, later representatives were more likely to want it removed. Otto Braided Hair said that the presence of the phrase "battle" on the marker was "just not good for people. Not good for the descendants that are—probably at that point, you know, they're experiencing some real deep emotions just because of the area, the location." It was particularly painful,

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[161] National Park Service Cultural Resources Inventory System (CRIS), "Resource ID 660870, HS-02: 1950 Battleground Marker," Accessed August 10, 2021; National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement,* 2011, 2.

[162] National Park Service Cultural Resources Inventory System (CRIS), "Resource ID 660870, HS-02: 1950 Battleground Marker," Accessed August 10, 2021. This text can be found under the "long management description" box within the record.

[163] Alexa Roberts, phone call with Laura Miller, December 20, 2022.

[164] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021. In a comment on an early version of this draft (November 2021), Janet Frederick noted that tribal members' calls to remove the monument have grown louder in recent years. During the original Section 106 process, the monument was to be moved to another area of the park. The tribes now want the monument removed completely, and the 106 process will need to be reopened.

[165] National Park Service, *Sand Creek Massacre National Historic Site: Resource Stewardship Strategy*, 2011, 49.

he said, because the marker was not "tribally originated."[166] The NPS considered other alternatives for the marker, such as moving it to another site location for visitor interpretation or into the site's museum collection and erecting a new marker on the site.[167] The marker was finally removed in June 2023 following a Section 106 determination process.[168]

The NPS completed moderate site development measures at Monument Hill to improve the visitor experience. This development made use of existing features to ensure minimal impact. Some of the development and early ideas about access have changed over the years as management goals have developed and changed with tribal input and consultation. For example, a former ranch road had led up to the marker and down into the creek bed. Before the site's official public opening, the tribes could access the creek bed from Monument Hill. After consultation with tribal representatives at the interim site planning charrette in 2006, this access was rescinded, and site managers blocked access from Monument Hill to the creek bed and sensitive resource area using a fallen tree. Site managers also installed a sign to prevent access to the creek bed via a social trail left from the time of Dawson's ownership that started at Monument Hill. When the NPS acquired the property, Zimmermann immediately blocked off the trail and reseeded it to prevent visitors from accessing the creek bed.[169]

Formalization of the ranch road and parking area at Monument Hill, designed as part of the *General Management Plan*, were in the design and compliance phases in 2017, and implementation of the design was completed in a later year.[170] Design ideas from March 2017 indicated using gravel surfaces for the road and parking area to limit development and overall viewshed impact. Parking and turnaround space for automobiles, Americans with Disabilities Act (ADA)-compliant vans, RVs, and buses were also needed and incorporated into this design.[171] Vault toilets at Monument Hill, which double as a tornado shelter, were installed in 2008, and were planned to remain in their existing location. Part of the former ranch road would be converted to a pedestrian trail (Monument

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[166] Otto Braided Hair, interview with Angela Sirna, February 9, 2023.

[167] National Park Service, *State of the Park Report*, 2017, 33; National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 33; National Park Service*, Finding of No Significant Impact: Interim Site Management Plan*, 2007, 7.

[168] "Historic Monument Marking Sand Creek Massacre Site Since 1950 Removed by Government," *Kiowa County Independent*, June 13, 2023, https://kiowacountyindependent.com/news/3699-historic-monument-marking-the-sand-creek-massacre-site-since-1950-removed-by-government.

[169] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[170] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[171] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021. Planning, Environment & Public Comment (PEPC) Project Search #66688, https://pepc.nps.gov/projectHome.cfm?projectId=66688. Accessed August 17, 2021. Scoping Trip Meeting Notes for "P17PS00698 - SAND – 210916 – Monument Hill – Parking, Roads and Trails, Sand Creek Massacre National Historic Site," March 10, 2017, Eads, CO, 1–4.

Trail) with other parts undergoing revegetation. In keeping with the concept of minimal development, no new amenities such as potable water or electricity were identified as needed at Monument Hill.[172]

Additional planning for Monument Hill included a new shade structure and seating, with an emphasis on minimal design to blend in with the site and landscape viewshed. At the time of the scoping trip, the shade structure design was still open, and no tribal consultation had occurred. Site managers, however, noted the importance of the viewshed from Monument Hill, the activities that have taken place there, and the activities that will occur there in the future (e.g., the Spiritual Healing Run). Site managers also noted that space was needed for the Spiritual Healing Run as well as space needed to set up four tipis and for possible future nighttime use. Finally, site managers noted that the planning for Monument Hill should include a permanent sleeve for a pine flagpole and access to the 1950s marker for offerings.[173] A gravel pedestrian trail from the parking area to the overlook was also planned, and William Allen, the facility manager at Bent's Old Fort NHS, surveyed the Monument Hill trail area in October 2017.[174]

As part of the improvements made at Monument Hill, staff added soil, graded slopes, and revegetated the area.[175] They also planned to replace an existing post and rail fence with a stone wall and interpretive signage.[176] They removed two observation scopes for the Monument Hill work and then replaced them in close proximity to their previous location to allow visitors to get a sense of the vastness of the landscape and the Cheyenne and Arapaho encampment area. The scopes point to specific areas of the massacre site, such as the sand pits where some Cheyenne and Arapaho people fled for safety.[177] Since the

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[172] Planning, Environment & Public Comment (PEPC) Project Search #66688, https://pepc.nps.gov/projectHome.cfm?projectId=66688. Accessed August 17, 2021. Scoping Trip Meeting Notes for "P17PS00698 - SAND – 210916 – Monument Hill – Parking, Roads and Trails, Sand Creek Massacre National Historic Site," March 10, 2017, Eads, CO, 1–4.

[173] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021. Planning, Environment & Public Comment (PEPC) Project Search #66688, https://pepc.nps.gov/projectHome.cfm?projectId=66688. Accessed August 17, 2021. Scoping Trip Meeting Notes for "P17PS00698 - SAND – 210916 – Monument Hill – Parking, Roads and Trails, Sand Creek Massacre National Historic Site," March 10, 2017, Eads, CO, 1–4.

[174] William Allen, *Memo Regarding Site Visit to SAND for a Pending Trail Construction Project*, 2017, 1–2, SAND Electronic Records.

[175] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[176] Scoping Trip Meeting Notes for "P17PS00698 - SAND – 210916 – Monument Hill – Parking, Roads and Trails, Sand Creek Massacre National Historic Site," March 10, 2017, Eads, CO, 4, SAND Electronic Records.

[177] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

1950 marker was at a known elevation, mentioned in the Sand Creek Massacre National Register nomination, and is on the site's HS-CRIS, staff worked around the historic marker when making improvements to Monument Hill.[178]

Staff made other improvements to Monument Hill including placing stones for area delineation and adding informal seating, both of which occurred in 2019. These improvements built up the area, and there were regional and staff concerns about the changes. The overall design, however, considered the landscape, viewshed, and color scheme to remain as unobtrusive as possible. Staff made these improvements with tribal input, ensuring that the development design included space (for processions and tipis) and features (capped flagpole insert) for tribal commemoration of the massacre, for ceremonies, and for the annual Spiritual Healing Run, which has started at Monument Hill since 2007.[179]

Figure 7: The 1950 historic marker placed by area civic groups in 1950, with offerings left by visitors, October 2017. *Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.*

[178] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7-4, 7-22. Scoping Trip Meeting Notes for "P17PS00698 - SAND – 210916 – Monument Hill – Parking, Roads and Trails, Sand Creek Massacre National Historic Site," March 10, 2017, Eads, CO, 4.

[179] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Trails

Sand Creek Massacre NHS managers, tribal representatives, and other NPS personnel have worked together to lay out and build trails that provide opportunities for visitors to experience the site and understand its significance. These trails have been carefully sited to avoid visual impacts to the landscape, while also allowing visitors to experience key areas of the site and reflect on the massacre. There have been multiple trail construction phases at the site and changes in the length, course, surface treatment, and interpretive opportunities along these trails. Interpretive trails have been changed to improve accessibility and viewshed intrusions.[180] Trails are discussed further in Chapter Seven on visitor use and management.

Visitor Use Area to Monument Hill Trail

At the time of the opening ceremony in 2007, a visitor use trail connected the visitor use area to Monument Hill. The location of this trail is reflected in the no-action alternative of the *General Management Plan*.[181] Staff planned and preliminarily surveyed new trails at the site, including a trail from the visitor use area to Monument Hill, in 2010.[182] After implementation of alternative E from the *General Management Plan*, they surveyed approximately 1.5 miles of trail for installation.[183] A new visitor interpretive trail, leading from the developed visitor use area to Monument Hill, was laid out and installed in 2016. This trail was designed to wind unobtrusively between the two areas, minimizing the effect on the viewshed.[184]

Bluff Trail

From Monument Hill, the interpretive trail, which begins at the visitor use area, continues along the bluff of Sand Creek allowing visitors to view the creek bed where the massacre took place. This trail, known by site managers as the Bluff Trail, is an out-and-back trail

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[180] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[181] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 65.

[182] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[183] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 90.

[184] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

that terminates at the West Boundary Road (a former ranch road).[185] Initially a dirt trail, the Bluff Trail was proposed in the interim site management plan as one of two trails at the site and was later included as part of the preferred alternative in the *General Management Plan*.[186] More information on the Bluff Trail is described in Chapter Seven on visitor use management.

Road Improvements

The improvements to the two ranch roads, which lead to the visitor use area and to Monument Hill, have been discussed in the sections above with emphasis placed on their minimal development and formalization. Another ranch road, known as the West Boundary Road, crosses the landscape and has been used by site management to access the terminus of the Bluff Trail. This road is administratively maintained for emergency vehicle and fire access. Because of accessibility issues with the pedestrian-only Bluff Trail, since 2015 (as part of the preferred alternative in the *General Management Plan*), site managers have been considering ways to use the West Boundary Road to improve visitor access, including allowing use of the road for tribal drop-off only, with no interpretation taking place at the drop-off point, and requirements that vehicles must return to the parking area in the developed administrative and visitor use area. Accessibility improvements must be implemented sensitively, given the mandate in the enabling legislation to preserve the natural and cultural landscape and limit development.[187]

Fencing

Beginning in 2005, site staff began repairing and replacing (as necessary) park boundary fencing, which had been ranch fencing. There were approximately 12 miles of boundary, all of which had been surveyed by the Bureau of Land Management. The new site fencing was usually comprised of a mix of a metal T-post, 3-inch wood posts, and three strands of wire with the top and bottom strand without barbs to provide better access for antelope and other wildlife. Site managers anticipated having to replace a half-mile of fence every year, and the new fence had a replacement life of 20 years. Crews replacing the fence have been

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[185] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 90; Planning, Environment & Public Comment (PEPC) Project Search #66687, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 2021.

[186] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 46; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 90–91.

[187] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

comprised of NPS staff and a Southern Cheyenne fence crew from Oklahoma. When the grazing lease expires in 2022 for Section 36, the site expects to replace the boundary fence to match the fencing at the rest of the site.[188]

Visitor and Research Center

The enabling legislation authorizes off-site support facilities and emphasizes the need to protect and preserve the cultural landscape to adhere to the 1864 landscape to the greatest extent possible.[189] The interim site management plan considers options for a visitor center at the site itself, in various locations and temporary configurations, in the nearby towns of Chivington or Brandon, and in Eads.[190] When considering the development of a visitor and research center in 2007 (brought forward by the Board of County Commissioners), NPS Intermountain Regional Director Mike Snyder advised that construction of a new visitor center within the site boundaries would impair the landscape and advised that the facility be constructed off site.[191]

NPS discussions about the development of a research center began well before the park's establishment. Alexa Roberts recalled, "it was always kind of the idea that the interpretation on site would be about November 29th, 1864, and here [the research center] they'd be able to explore the bigger picture—treaty histories, how the Cheyenne got to this part of the country, and who they became today." Roberts suggested that the research center idea was rooted, in part, in the ongoing public debates about the massacre:

> there were still controversies about, 'I believe it was justified'—well, no, it was clearly a slaughter. We weren't going to argue that point. I mean, we're guided by the investigations of 1865 that said it was a massacre, we're guided by primary documentation. But, people still want to debate that—that's fine, they should be able to study that in its full context.[192]

A research center would help provide visitors and descendants this context by creating a space for researching primary sources, recording oral histories, and building an archival collection related to the site's history. It would also provide a space to contemplate the

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[188] Planning, Environment & Public Comment (PEPC) Project Search #76924 and #68351, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 25, 2021; National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #170115, #170120, #200444, #211261, and #211266. PMIS contains entries for the cyclic maintenance of the boundary fence.

[189] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[190] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 53.

[191] Sand Creek Massacre National Historic Site, "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2, SAND Electronic Records.

[192] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 19, 2021.

contemporary relevance of the Sand Creek Massacre. By housing research and discussion space in an offsite location, staff and visitors to the site could give their full attention to the day of the massacre as they explored the grounds.

The Board of County Commissions began to envision and initiate a project to create a Sand Creek Massacre NHS Visitor and Research Center in the historic Murdock Building (owned by Kiowa County) in downtown Eads.[193] The Murdock Building could meet the joint needs of Kiowa County and the National Park Service—specifically the need for administrative offices, a visitor center, and a research center—and also hold a senior citizen's center for the county.[194] While the enabling legislation authorizes an off-site support facility, there is no specific authorization to expend federal funds on a non-federally owned property. [195] Since the NPS did not have authorization to spend federal funds, general management planning did not include the Murdock Building.[196]

The NPS evaluated other alternatives for an off-site visitor and research center, including sharing a building with the US Department of Agriculture. In discussions with an Intermountain Regional Office leasing specialist and individuals with the General Services Administration (GSA), sharing the county-owned Murdock Building was determined to be the most feasible alternative. Partners began to invest what would become more than $2 million in non-federal funds to renovate the building. Since there was still no avenue for the NPS to expend federal money on non-federally owned property, on advice from the Intermountain Region, site staff did not submit PMIS requests related to the renovation of the Murdock Building.[197]

As a bipartisan effort between former Congressman Cory Gardner and former Senator Mark Udall, the Carl Levin and Howard P. "Buck" McKeon National Defense Authorization Act for Fiscal Year 2015 gave the NPS authority to expend funds from existing budgets to develop support facilities, including visitor centers for national historic sites under certain circumstances.[198] With assistance from the Intermountain Region Planning Division, NPS personnel began holding planning charrettes with partners and submitted a request for Centennial Challenge funds for 2015 to match $75,000 pledged by

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[193] Alexa Roberts and Karl Zimmermann, "Letter to the Editor-Roberts and Zimmerman," *Kiowa County Independent,* April 3, 2019, https://kiowacountyindependent.com/news/1553-letter-to-the-editor-roberts-and-zimmerman.

[194] Sand Creek Massacre National Historic Site "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2.

[195] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[196] National Park Service, *State of the Park Report,* 2017, 44; Sand Creek Massacre National Historic Site "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2.

[197] National Park Service, *State of the Park Report,* 2017, 44; Sand Creek Massacre National Historic Site "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2.

[198] Carl Levin and Howard P. *"Buck" McKeon National Defense Authorization Act for Fiscal Year 2015,* Public Law 113-291, *U.S. Statutes at Large* 128 (2014): 3806.

the United Methodist Church. The NPS matched an earlier donation from the church in 2010 for $50,000 for future development and operation of the Sand Creek Massacre Research Center. The donation was placed with Colorado Preservation, Inc. through a cooperative agreement. Another request for Centennial Challenge funds was submitted in 2016 to match over $1 million in funds provided by Kiowa County.[199] The donations from the United Methodist Church were part of the church's repentance for its members' role in the Sand Creek Massacre and the violence they committed against early indigenous communities. Additional details about this United Methodist Church's partnership with the site can be found in Chapter Four on partnerships.

In 2015, the plan for the building included the NPS leasing the Murdock Building from GSA, which would lease it from Kiowa County. GSA had been involved with the Murdock Building discussions since 2007. The Intermountain Region leasing specialist asked WASO staff about including the site's lease in WASO-funded leasing accounts and was told that the NPS would need to prepare a justification for a sole-source contract. In 2016, the Intermountain Regional Office identified year-end funds for design and construction drawings of tenant finishes in the intended NPS-occupied portion of the building. GSA delegated leasing authority of the property to the NPS, which allowed the NPS to initiate leasing negotiations with Kiowa County.[200] The site continued to use year-end funds until 2018—outside of the scope of this administrative history—when WASO granted the site enough year-end funds to complete the building's rehabilitation. Sharing the county-owned building was ultimately the most feasible alternative, and the Murdock Building has been considered mutually beneficial between the NPS and the local community. The building meets the needs of the NPS as administrative space, visitor center, and research center and also meets the county's needs as a senior citizens' center. The building also fulfills NPS policy mandates to use historic buildings before leasing newer properties, and the visitor center contributes to the economic development of an impoverished rural community. The partnership for the preservation and use of the building was featured in a statewide historic preservation film in 2012 and serves as a potential model for other NPS units.[201]

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[199] National Park Service, *State of the Park Report,* 2017, 44; Sand Creek Massacre National Historic Site "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2.

[200] National Park Service, *State of the Park Report,* 2017, 44; Sand Creek Massacre National Historic Site "Strategic Planning for the SAND Visitor and Research Center," March 30, 2015, 1–2.

[201] National Park Service, *State of the Park Report,* 2017, 44. The Murdock Building renovations were completed in 2020, and site staff had fully moved into their new offices by May 2021. Some staff were still located at the site for practical and logistical reasons. Colorado Preservation Inc., "Murdock Building Rehabilitation," http://coloradopreservation.org/projects/current-projects/murdock-building-rehabilitation, last modified November 2020; Priscilla Waggoner, "NPS Receives Funding to Complete New Sand Creek Visitors' Center," *Kiowa County Independent,* August 8, 2018, https://kiowacountyindependent.com/news/1280-nps-receives-funding-to-complete-new-sand-creek-visitors-center; Alexa Roberts and Karl Zimmermann, "Letter to the Editor-Roberts and Zimmerman," *Kiowa County Independent,* April 3, 2019, https://kiowacountyindependent.com/news/1553-letter-to-the-editor-roberts-and-zimmerman.

Figure 8: Sand Creek Massacre National Historic Site Visitor & Education Center in the Murdock Building in downtown Eads, Colorado.
Photo by Janet Frederick, 2020. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

> Alexa Roberts said of the Murdock Building renovations,
>
> This building, we really had to advocate for this building. This was considered—this was an aberration [laughs]. . . . at the very end the Park Service came through with a whole big bunch of money and it was great—that was our budget folks in the region, who were working with Washington, who finally made this happen. It was a long time coming. Up until that time it was like, what are you going to do with it, how are you going to sustain it. . . . [I]f you think you're going to pull this off, if this is critical, what are you going to give up?[202]

Although they had to work hard to secure funding for the visitor center and research center, the building was an essential addition to Sand Creek Massacre National Historic Site.

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[202] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 19, 2021.

Site Designations and Management Implications (2007–2017)

The historic and cultural significance of Sand Creek Massacre NHS has been recognized by its inclusion in several designation programs. These designations have implications for management and fulfilling the enabling legislation. At various times since its establishment, Sand Creek Massacre NHS has been considered for inclusion in other programs, and future interest or inclusion into these programs is still possible. Below is a summary of the designation programs that have been considered for Sand Creek Massacre NHS.

National Register of Historic Places (2001 and 2016)

The National Register of Historic Places (NRHP) is the official list of the nation's historic places worthy of preservation. Authorized by the National Historic Preservation Act of 1966 and administered by the National Park Service, the NRHP supports public and private efforts to identify, evaluate, and protect America's historic and archeological resources.[203] As a result of tribal interest in protecting the site and the story of the Sand Creek Massacre, congressional interest and support, and location studies in the 1990s, the Sand Creek Massacre site was listed in the National Register of Historic Places on September 28, 2001, under Criterion A (association with an important event) and Criterion D (data potential).[204]

The 2001 NRHP boundary is different than the site's legislated boundary. The legislated boundary consisted of approximately 12,480 acres, but the 2001 NRHP boundary encompassed 7,680 acres and included lands that were privately owned.[205] Within the legislated boundary, the southwest corner of the site comprised of Section 36 was not within the 2001 NRHP boundary.[206] Section 36 was added to the site boundary in 2015, and a boundary update was made to the NRHP in 2016. Thus, the total NRHP acreage is 8,116.828 acres.[207]

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[203] "What is the National Register of Historic Places?" National Park Service, last modified September 6, 2023, https://www.nps.gov/subjects/nationalregister/what-is-the-national-register.htm.

[204] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History*, by Ari Kelman, draft, 2016, 3–11; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, iii.

[205] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, iii, 7-1, 8-24.

[206] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 8, 43.

[207] US Department of the Interior. *Budget Justifications and Performance Information, Fiscal Year 2018, National Park Service*, https://www.nps.gov/aboutus/upload/FY-2018-NPS-Greenbook.pdf. Accessed October 12, 2023, ONPS Summaries 32; Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 7-5 to 7-6.

National Historic Landmarks Program

National Historic Landmarks (NHLs) are historic properties that illustrate the heritage of the United States. The National Historic Landmarks program, which predates the National Register of Historic Places, was established under the 1935 Historic Sites Act. Section 462 of the Act, signed into law by President Franklin Roosevelt, authorized the National Park Service and the Secretary of the Interior to assess and preserve sites and buildings of historical significance. There are over 2,600 NHLs in the US today, and they come in many forms: historic buildings, sites, structures, objects, and districts. Each NHL represents an outstanding aspect of American history and culture.[208]

In 2004, prior to the dedication of the site, Alexa Roberts consulted with Jill Cowley, the Program Lead of the Intermountain Region Cultural Landscapes Program, on the pros and cons of a National Historic Landmark designation.[209] The question of NHL status was also a part of the interim site management plan, which indicated that the site met NHL criteria for national significance and integrity. The interim site management plan suggested that the site may be eligible under NHL Criterion 1 (associated with an event that outstandingly represents broad national patterns of United States history, and from which an understanding and appreciation of those patterns may be gained) and NHL Criterion 6 (has yielded and is likely to yield information of major scientific importance). For Criterion 6, the plan notes that the site had only been the subject of reconnaissance-level archeological investigations and new information may be gained related to military and American Indian conflict.[210]

In 2011 Astrid Liverman, the National and State Register Coordinator for History Colorado, inquired into NHL designation. Liverman's inquiry prompted a response in 2012 from Christine Whitacre, the program manager of the Heritage Partnerships Program in the Intermountain Region.[211] Whitacre stated that pursuing NHL status for the Sand Creek Massacre would not be allowed according to NPS *Management Policies.* Whitacre stated, "That policy document addresses the question of National Historic Landmarks within national park units. Briefly, if the national significance of the resource is adequately recognized in the park's authorizing legislation, then it is against policy to subsequently pursue National Historic Landmark designation for the same qualities of national

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[208] National Park Service, "National Historic Landmarks Program," last modified September 6, 2023, https://www.nps.gov/subjects/nationalregister/what-is-the-national-register.htm.

[209] Jill Cowley, Historical Landscape Architect, Program Lead, IMR Cultural Landscapes Program, email to Alexa Roberts, Superintendent, Sand Creek Massacre National Historic Site, June 29, 2004, SAND Electronic Records.

[210] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 8.

[211] Christine Whitacre, letter to Astrid Liverman, National and State Register Coordinator, History Colorado, March 13, 2012, 1–2, SAND Electronic Records.

significance."[212] Whitacre then cited NPS *Management Policies* 5.1.3.2.2, National Historic Landmark Designation, and stated that "to nominate a park unit (or important part of a park unit) as an NHL, we are required to justify that its national significance was not adequately recognized in the organic legislation."[213] She concluded, "it appears to us that pursuing NHL status for the Sand Creek Massacre would not be allowed according to NPS *Management Policies*. The national park unit's status is already higher than NHL status because it was designated by the president and congress, while NHLs are designated by a cabinet member (Secretary of the Interior)."[214] In short, pursuing an NHL designation was redundant because the site's significance was already sufficiently recognized under its enabling legislation.

This correspondence between Liverman and Whitacre appears to have been the final determination for NHL designation, though site managers have noted that they still receive questions concerning NHL designation.[215] To those who ask, site managers respond that, although Sand Creek Massacre National Historic Site has not been designated a National Historic Landmark, its historical significance has been acknowledged through its designation by the US government as a unit of the National Park Service.[216]

National Heritage Areas Program

National Heritage Areas are places where historic, cultural, and natural resources combine to form cohesive, nationally important landscapes. Unlike national parks, National Heritage Areas are large lived-in landscapes. Consequently, National Heritage Areas collaborate with communities to determine how to make heritage relevant to local interests and needs.[217] In 2013, a regional nonprofit organization focused on heritage tourism called Canyons & Plains of Southeast Colorado (formed in 2003) began organizing funders and supporters for a feasibility study for creating a National Heritage Area in the region.[218] They announced the study at a meeting February 2013 and quickly drew criticism and pushback from local residents. The designation was not supported by everybody, including some

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[212] Christine Whitacre, letter to Astrid Liverman, National and State Register Coordinator, History Colorado, March 13, 2012, 1.

[213] Christine Whitacre, letter to Astrid Liverman, National and State Register Coordinator, History Colorado, March 13, 2012, 1–2.

[214] Christine Whitacre, letter to Astrid Liverman, National and State Register Coordinator, History Colorado, March 13, 2012, 2.

[215] Alexa Roberts, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[216] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[217] National Park Service, "Community-Led Conservation and Development," last modified March 15, 2019. https://www.nps.gov/subjects/heritageareas/index.htm.

[218] Joshua Zaffos, "How a plan to save southeastern Colorado went off the rails," *High Country News*, November 23, 2015. https://www.hcn.org/issues/47.20/plan-to-save-southeastern-colorado-went-off-rails.

NPS regional office personnel. Local landowners formed their own organization, called the Southeast Colorado Private Property Rights Council, and began holding meetings that helped spread rumors and misinformation about the plan. A 2015 article in *High Country News* described what happened next:

> The facts were drowned out by the noise, including rumors that locals would be forced to wear 19th century-style clothing. Some suggested the proposal was part of Agenda 21, a United Nations initiative for sustainable development, which right-wing commentators regard as a global land-grab conspiracy. Ultimately, every county commission in the Lower Arkansas passed a resolution opposing the effort.[219]

There had also been some threats to the site regarding the designation of the site and the interpretation of the events at Sand Creek, with some individuals holding anti-American Indian views.[220] Security reviews and assessments in 2013 and 2015 provide information regarding facility risks and mitigations in response to a variety of threats.[221] By the summer of 2014, the study was put on hold, and the heritage tourism group and its partners redirected their efforts to less controversial actions, such as "developing farmers markets, promoting local grown food and agri-tourism, and installing signs that direct visitors to nearby attractions." Nevertheless, Roberts told *High Country News* in 2015, "We still think it could be the right thing for this region."[222] As of 2017, the National Heritage Area effort was still unsuccessful.

Efforts to Designate the Site as a Traditional Cultural Property

A Traditional Cultural Property is a property that is eligible for inclusion in the National Register of Historic Places based on its association with the cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institutions of a living community. Traditional Cultural Properties are rooted in a traditional community's history and are important in maintaining the continuing cultural identity of the community. The Traditional Cultural Property must be a physical property or place, though the beliefs or practices associated

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[219] Joshua Zaffos, "How a plan to save southeastern Colorado went off the rails," *High Country News*, November 23, 2015.

[220] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[221] National Park Service, *Sand Creek Massacre National Historic Site Physical Security Assessment. Intermountain Region, Visitor and Resource Protection*, 2013, 2–22, SAND Electronic Records; US Department of Homeland Security, Facility Security Assessment, Federal Protective Service, 2015, 5–7, 11–17, 27–29, SAND Electronic Records.

[222] Joshua Zaffos, "How a plan to save southeastern Colorado went off the rails," *High Country News*, November 23, 2015.

with the property are of central importance.[223] While the Sand Creek Massacre NHS has not been formally designated a Traditional Cultural Property, the site is listed in the National Register of Historic Places, and site managers have been careful to emphasize the site's important connections with the descendants of the massacre victims and survivors and the Cheyenne and Arapaho Tribes. [224]

There have been some NPS management inquiries regarding how to characterize, plan, and manage the cultural landscape. In 2004, before the dedication of the site, Alexa Roberts consulted with Jill Cowley—the Program Lead of the Intermountain Region Cultural Landscapes Program—on the cultural landscape at Sand Creek Massacre NHS, cultural landscape management concerns, and planning needs. Cowley recommended an ethnographic overview and assessment rather than a cultural landscape inventory. An ethnographic overview and assessment would focus more on the ethnographic resources and issues and would similarly document the landscape history without requiring a National Register determination of eligibility, which was already known.[225] Management put in a project request and received funding, and the regional cultural anthropologist put together a scope of work that emphasized ethnobotanical identification. They hired a contractor who interviewed tribal representatives during a visit to the site. Alexa Roberts recalled that one of the tribal representatives objected to the contractor's questions, feeling that they were asking him to reveal sensitive and proprietary cultural knowledge. The report was completed, but the remaining tribal representatives distanced themselves from the fieldwork out of respect for their fellow representative's concerns. The NPS decided to shelve the project, and it was rolled into a larger Ethnographic Overview and Assessment for both Sand Creek and Bent's Old Fort. That report was also completed but not distributed.[226]

In a 2017 interview, Nancy Brown, with the Advisory Council on Historic Preservation, asked Alexa Roberts if there was anything on Sand Creek Massacre National Historic Site's website about Traditional Cultural Properties and cultural landscapes. Roberts noted that there was some information about the site, oral histories, and the site study location but not specifically about the strengths of the meaning of the landscape. Roberts noted that a deeper understanding of the ethnographic landscape was needed.[227]

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[223] National Park Service, *National Register of Historic Places-Traditional Cultural Properties (TCPs): A Quick Guide for Preserving Native American Cultural Resources*, 2012, 1; Patricia L. Parker and Thomas F. King, "National Register Bulletin 38: Guidelines for Evaluating and Documenting Traditional Cultural Properties," 1992, 9, https://www.nps.gov/subjects/nationalregister/upload/NRB38-Completeweb.pdf.

[224] Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, i; Liverman, *National Register of Historic Places Nomination: Sand Creek Massacre Site (Boundary Increase)*, 1–2.

[225] Jill Cowley, Historical Landscape Architect, Program Lead, IMR Cultural Landscapes Program, email to Alexa Roberts, Superintendent, Sand Creek Massacre National Historic Site, June 29, 2004, SAND Electronic Records.

[226] Alexa Roberts, phone call with Laura Miller, December 20, 2022.

[227] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

The 2017 *State of the Park Report* noted that no cultural landscapes had been identified in the site and referenced the early discussions about an ethnographic landscape study. The *State of the Park Report* recommended revisiting the site as an ethnographic landscape.[228]

Conclusion

The challenges of interpreting and implementing the site's enabling legislation helped drive the development of what Roberts called a "Sand Creek culture" among the site's staff. This culture, she and Zimmermann acknowledged, could be confusing to new site staff and new tribal leaders who were not as familiar with the site's history of interpretation and decision making.[229] It was a creative, collaborative, and welcoming environment, but also had few boundaries around work hours and job titles. Roberts said that particularly in the site's early years, "It was like a huge family. . . . It was like . . . do what you need to do." She continued, "We didn't work [standard] work hours. We didn't work nine to five hours. We worked all the time." Zimmermann added,

> Now the new people—and it's not anything against somebody who's going to start tomorrow, but it's just not part of the National Park Service [culture]. It's just the way it is. It's like: 'Well, is that in my PD [position description] or not?' . . . I understand. It's like, 'Well, I'm resource. I don't have to do interpretation.' Well, back then, we all did it. . . . It was fun. It was way different.

Roberts concluded that this mentality and approach to their work was "grounded in the respect that Sand Creek is due."[230]

This commitment to respecting the site and its tribal partners has driven NPS site managers to foster collaborative relationships with tribal representatives and other nearby NPS units to interpret the enabling legislation, relevant law, and NPS policies. Site managers have also worked toward developing the background information through research prior to 2007, which has informed management plans that guided management direction from 2007 to 2017. The strategic implementation of these management plans through close consultation with tribal representatives set the early course for the site in terms of development or alternatives to development at the site, sensitivity to tribal considerations, partnerships, resource management, and visitor use. The next few chapters take a deeper dive into these topics.

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[228] National Park Service, *State of the Park Report,* 2017, 26.

[229] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[230] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18-19, 2021.

CHAPTER THREE

Relationship with Tribes

This chapter discusses relevant sections of the enabling legislation concerning descendant and tribal access and rights as well as how site managers interpreted and implemented those sections. It also discusses tribal consultation and the tribal liaison program at the site, further emphasizing the importance of tribal input on management decisions. The repatriation area as well as repatriation protocols and events are also examined; however, some details, including tribal access to museum collections, appear in Chapter Eight on integrated resource management.

In July 2021, the study team spoke with two former tribal representatives to Sand Creek Massacre National Historic Site: Henry Little Bird Sr., the Southern Arapaho tribal representative for the Cheyenne and Arapaho Tribes, Oklahoma (2010–2016), and Karen Little Coyote, the Southern Cheyenne tribal representative for the Cheyenne and Arapaho Tribes, Oklahoma (2010–2018). In February 2023, NPS Regional Historian Angela Sirna interviewed Northern Cheyenne tribal representative Otto Braided Hair (1999–present). Collectively, these interviews are invaluable in understanding tribal perspectives on their relationship with the NPS employees at Sand Creek Massacre National Historic Site and their hopes for the future of those relationships. We have included quotes from these interviews throughout this chapter.

Establishing Understanding

The Cheyenne and Arapaho descendants of the Sand Creek massacre victims never forgot the events of November 29, 1864. These descendants were, furthermore, instrumental in the research and legislation to designate the site as a unit of the National Park Service and instrumental in ensuring that the federal government properly identify the site as the place where the US military massacred their ancestors.[1] Former site superintendent Alexa Roberts stated in an interview with the National Center for Preservation Technology and Training (NCPTT) that the United States accepted responsibility for the 1864 massacre of

[1] Ari Kelman, *A Misplaced Massacre: Struggling over the Memory of Sand Creek* (Cambridge, MA: Harvard University Press, 2013), and US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History,* by Ari Kelman. Draft, 2016, 4–12, 101. Kelman's draft weaves the descendants' contributions throughout, but these chapters specifically focus on their testimony for the site study act (1998) and their transfer of their property into federal trust.

Cheyenne and Arapaho people at Sand Creek and condemned the massacre in 1865. Although the federal government accepted responsibility for the massacre, lifeways of the Cheyenne and Arapaho people were lost, and tribal lands continued to be taken. From the trauma of the massacre itself and the subsequent destruction of traditional Cheyenne and Arapaho culture, the Sand Creek Massacre became a "painful, searing element of tribal identity today" with tribal members returning to the location year after year, which remained unmarked for decades. In 1950, local civic groups installed a small granite marker on a hill overlooking Sand Creek. Importantly, the marker incorrectly identified the site as the "Sand Creek Battle Ground" rather than identifying it as the location of a brutal massacre of Cheyenne and Arapaho people by federal troops.

Early NPS managers prioritized honoring and respecting the Cheyenne and Arapaho ancestors and the site's tragic history.[2] As mentioned elsewhere, the site is unique in a number of ways, one of which is that the 2000 enabling legislation explicitly uses the term "massacre" to describe the actions of US Army that day.[3] Site managers emphasized that the term "massacre" is historically accurate as three contemporary investigations determined that it was a massacre and not a battle.[4] These three investigations included two military inquiries and one by the United States Congress Joint Committee on the Conduct of the War.[5] Furthermore, the Treaty of the Little Arkansas River (October 14, 1865)—which established peace between the United States and the Cheyenne and Arapaho Tribes—authorized the president of the United States to set aside land for a reservation. Article 6 of the treaty specifically discusses the United States' condemnation of the Sand Creek Massacre and seeks to provide some reparations through land grants in an area designated for their reservation and pay in funds, animals, goods, provisions, or other items that were taken from them by the federal troops at the Sand Creek Massacre.[6] The term "massacre," which is not used in the name of any other NPS unit, therefore accurately reflects the historic perspective of the Cheyenne and Arapaho Tribes and the formal determination of the actions perpetuated by representatives of the United States government.

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[2] Alexa Roberts, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[3] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[4] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[5] US Congress, House, *Report of the Joint Committee on The Conduct of the War,* 38th Congress, 2d session, 1865. The section "Massacre of Cheyenne Indians" is on pages 153–264 and contains various testimony, papers, proclamations, telegrams, etc. that provide information and context to the massacre. Accessed October 12, 2023. https://archive.org/details/reportjointcomm01goocgoog/page/n6/mode/2up?view=theater.

[6] "Treaty of Little Arkansas River." Ratified Indian Treaty #341, Little Arkansas River, Kansas, October 14, 1865. *Series: Indian Treaties 1789–1869.* Online at https://catalog.archives.gov/id/299802. National Archives and Records Administration.

Remembering that the site was the location of a massacre and has been officially considered as such from 1865 through today has driven the creation of this unit of the National Park Service, its legislation, and management actions.[7]

Legislation and Consultation

The site's enabling legislation specifically mentions the Cheyenne and Arapaho Tribes of Oklahoma, the Northern Cheyenne Tribe, and the Northern Arapaho Tribe and outlines descendants' rights, access to, and use of federally acquired land within the site in accordance with the terms and conditions of a written agreement between the secretary of the interior and the tribe of which the descendant is a member. The legislation also states that reasonable needs of descendants must be considered in park planning and operations, especially with respect to commemorative activities in designated areas within the site. Descendants or other members of a tribe must have reasonable access to federally acquired land within the site for the purpose of carrying out a traditional, cultural, or historical observance, and any fees are waived for this access. In granting this access, the National Park Service is authorized to temporarily close one or more specific sections of the site to the general public to protect the privacy of tribal members engaging in a traditional, cultural, or historical observance in those areas. Any such closure is to affect the smallest practicable area for the minimum period necessary. Additionally, a portion of the federally acquired land must be established and operated as a site where items such as Native American human remains, associated funerary objects, unassociated funerary objects, sacred objects, and objects of cultural patrimony are interred, reinterred, preserved, or otherwise protected under NAGRPA or other law. Finally, the secretary of interior must consult and solicit advice and recommendations from descendants and tribes.[8]

The site's staff, recognizing the sensitive nature of its history and resources, have worked diligently to build relationships with the Cheyenne and Arapaho Tribes that go beyond what is outlined in the enabling legislation and what is typically defined as "consultation" in the National Park Service. Tribal consultation, in general terms, is guided by Executive Order (EO) 13175.[9] This EO seeks to strengthen the government-to-government relationships between federally recognized Indian tribes and the United States. The EO recognizes the unique trust relationship between the United States and Indian tribes and recognizes the rights of Indian tribes to self-government. EO 13175, the Department of the Interior Policy on Consultation with Indian Tribes, and Secretarial Order 3317 require that

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[7] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[8] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[9] Executive Order 13175, *Creating the Sand Creek Consultation and Coordination with Indian Tribal Governments*, 2000, 2–3, https://2009-2017.state.gov/documents/organization/136740.pdf.

National Park units conduct government-to-government consultations with federally recognized Indian tribes when undertaking any federal action that may have a direct impact on tribes or tribal lands.[10] These documents describe consultation as a deliberative, open, and transparent process to create effective collaboration in a meaningful and good-faith manner to inform federal decision-making. The exchange of information promotes enhanced communication that emphasizes trust, respect, and shared responsibility.[11]

Other federal mandates and policies impact consultation, such as Section 106 of the National Historic Preservation Act (NHPA) and the National Environmental Policy Act (NEPA). The consultation process for Section 106 is limited to federal undertakings having an effect on historic properties, and mandates the federal agency seek ways to avoid, minimize, or mitigate any adverse effects on historic properties. Consulting parties are defined as the federal agency, state historic preservation officer (SHPO), or tribal historic preservation officer (THPO). For tribes that have not assumed the responsibilities of a SHPO or THPO, the federal agency may consult with a representative designated by the tribe.[12] Sections 1501.2 and 1501.7 of the Council on Environmental Quality (CEQ) Regulations call for the involvement of tribes that may be affected by a federal proposal, and a 1999 Memorandum to the Heads of Federal Agencies encouraged more active solicitation of tribes for NEPA documents.[13] Consultations are also required for NAGPRA. Together, these laws, mandates, and policies create a protocol for consulting with Indian tribes.[14]

Since site managers and staff recognized the sensitivity and importance of the site to Cheyenne and Arapaho people, and the enabling legislation includes rights and needs of descendants, NPS staff have used an expansive interpretation of "consultation." Site managers have embraced an open, transparent, meaningful, and good-faith effort to engage

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[10] US Department of the Interior, *Department Manual (512 DM 5), "Procedures for Consultation with Indian Tribes,"* 2015, 1–4, https://www.doi.gov/sites/doi.gov/files/uploads/dm_chapter_5_procedures_for_consultation_with_indian_tribes.pdf; US Department of the Interior, *Secretarial Order 3317, Department of the Interior Policy on Consultation with Tribes,* 2011, https://www.doi.gov/sites/doi.gov/files/migrated/tribes/upload/SO-3317-Tribal-Consultation-Policy.pdf.

[11] US Department of the Interior, *Secretarial Order 3317, Department of the Interior Policy on Consultation with Tribes,* 2011.

[12] "Protection of Historic Properties," 36 CFR 800*,* 2004, https://www.federalregister.gov/documents/2004/07/06/04-15218/protection-of-historic-properties.

[13] *Regulations for Implementing the Procedural Provisions of the National Environmental Policy Act*, 40, CFR Parts 1500–1508, 1978, https://www.energy.gov/sites/prod/files/NEPA-40CFR1500_1508.pdf. Accessed August 27, 2021; George T. Frampton Jr., "Memorandum for Heads of Federal Agencies," Executive Office of the President, Council on Environmental Quality, July 28, 1999, https://ceq.doe.gov/docs/ceq-regulations-and-guidance/regs/ceqcoop.pdf.

[14] National Park Service, "Cultural and Natural Resource Consultation," last modified February 1, 2021, https://www.nps.gov/articles/000/cultural-and-natural-resource-consultation.htm; Executive Order 13175, *Creating the Sand Creek Consultation and Coordination with Indian Tribal Governments*, 2000, 2–3; "Protection of Historic Properties," 36 CFR 800*,* 2004; US Department of the Interior, *Department Manual (512 DM 5), "Procedures for Consultation with Indian Tribes,"* 2015, 1–4, https://www.doi.gov/sites/doi.gov/files/uploads/dm_chapter_5_procedures_for_consultation_with_indian_tribes.pdf.

with tribal representatives and have considered these efforts to be a fundamental aspect of the site's identity. As Alexa Roberts stated in 2016,

> While the Sand Creek Massacre NHS appears essentially as a natural landscape, in actuality it is a sacred site that is imbued with cultural meaning and values. In that regard, it is both a natural and cultural park. Because of the intense tribal involvement in the development, planning and management of the site, much of the park's cultural efforts are those surrounding its relationships with the Cheyenne and Arapaho Tribes and other partners. The park has worked in close coordination and consultation with representatives and governments of the Northern and Southern Cheyenne and Arapaho Tribes since 1998. The Tribes have been involved in the development of every park planning document, resource stewardship project, and interpretive development since the initial site location studies almost 20 years ago. These relationships have remained intact, strong, and trustful since the very beginning of the efforts to establish the national historic site. In addition to the partnerships with the four tribes, the park has maintained strong relationships with park neighbors, county officials and community leaders, state officials and the Colorado History Center, Congressional delegations, and so forth.[15]

Tribal consultation at Sand Creek Massacre NHS is not limited to only federal undertakings as outlined in Department of Interior policy and regulations, and consultation is not simply a collateral duty for NPS managers and program leads at the site. Instead, every site manager plays a role in tribal consultation, including assisting with and participating in important social and cultural events that strengthen trust, respect, and shared responsibility.

Finally, the nature of the site's enabling legislation and consultations with the Cheyenne and Arapaho Tribes raised specific questions for site management that required input from the National Park Service's regional solicitor. In January 2007, Alexa Roberts sent a list of questions that arose during consultations with the tribes and discussions among the NPS staff relative to the site's trust responsibilities to the tribes. These questions included clarification on the status of trust lands and whether the trust lands met the definition of "Indian Country," economic implications, responsibilities for the trust lands, law enforcement jurisdiction, Bureau of Indian Affairs authority, resources definitions, and balancing the trust responsibly with the tribes and the NPS responsibility to the public. There was also an issue about determining descent from Cheyenne and Arapaho people present at the Sand Creek massacre because defining descendants among the tribes was not clear, and there were significant implications of this as it related to Article 6 of the 1865 Treaty of Little Arkansas regarding reparations never paid by the federal government. Roberts acknowledged the unique position that the site was in regarding the treaty and site staff expertise but was concerned that the site could cause additional conflict if the NPS

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[15] Alexa Roberts, "Site Planning Document for the General Management Plan," 2016, 3, SAND Electronic Records.

took on the role of researching descendants' genealogies. Bob Comer, the regional solicitor for the Department of the Interior, responded to these concerns and upheld the authority of the NPS in the management of the site including the trust property. Comer's response, however, included information regarding hiring strategies to attract Native applicants, and how Indian Trust Assets and data should be handled at the site. Comer also responded to some of the economic questions by affirming the rights of the site in entering cooperative agreements with the tribes, enabling future economic revenue that could be part of these cooperative agreements, and referring the site to others for questions regarding commercial use authorizations. Finally, Comer noted that the issue of defining "descendants" for the purposes of reparations was not the responsibility of the NPS. However, Comer noted that any member of the tribes could be considered a descendant since their ancestors were affected in some way by the Sand Creek Massacre, and he encouraged the site to be as inclusive as possible when it came to questions of providing reasonable access to Sand Creek Massacre NHS.[16]

Tribal Liaison Program

With the importance of tribal rights, access, and use of the site as outlined in the enabling legislation and NPS managers' understanding of the importance of building trust and respect with tribal government, the tribal liaison program was established in 2011.[17] The program is fundamental to the site's management.[18] As Roberts has stated, the importance of the site to the Cheyenne and Arapaho descendants has always been part of their identity, and the site continues to connect contemporary people with their own history:

> Tribal members and visitors visit the site to pray, to connect with their history, and to heal. That's become an extremely important component of this site. There's been, since the tribal involvement has begun during the site location effort in 1999, a strong emphasis on the healing process and on prayer. Primarily, to put the spirits of the ancestors, the stories are there to put them to rest but also to start healing the cultural trauma that people still feel or have experienced for all of these generations by never having any acknowledgement or opportunity to put anything to rest at Sand Creek. Today, the connection with history and the healing effort is shared both by tribal descendants and other tribal members and by the public as well.[19]

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[16] "Treaty of Little Arkansas River." Ratified Indian Treaty #341, Little Arkansas River, Kansas, October 14, 1865, 8–10, *Series: Indian Treaties 1789–1869,* https://catalog.archives.gov/id/299802, National Archives and Records Administration; Robert Comer, letter to Alexa Roberts, January 4, 2007.

[17] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[18] Alexa Roberts and Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[19] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

Having a designated tribal liaison on staff helps promote that connection with history and support healing.

Karen Wilde was the tribal liaison for Sand Creek Massacre National Historic Site from 2011 to 2021. Wilde, a member of the Muscogee (Creek) Nation, first started working at the site in a 4-year-term position as a cultural liaison. At that time, Wilde reported both to the superintendent and the chief of interpretation. Her first consultation was the 2012 meeting on the "Big Head Site" archeological project.[20] The "Big Head Site" project was a metal detection survey, archeological investigation, and mapping project searching for evidence of an engagement between members of the 3rd Regiment Calvary of the Colorado Volunteers and Cheyenne and Arapaho people associated with the Cheyenne warrior Big Head. The investigation focused on segments of Section 24 and Section 25, from the bluff edge to the western site boundary.[21] While archeologists, site staff, and tribal representatives were on site during the metal detection survey, one of the tribal representatives looked over the bluff edge and was struck by how the view from that position included all of the elements of the massacre: from the village site and the sand pits to the paths of flight and troop positions. She said that she really had not grasped the full story until she saw the massacre site from that vantage point. This project and consultation meeting led to the development of final plans for the Bluff Trail.[22]

Wilde's tribal liaison position became a full-time permanent position in 2015, reporting directly to the superintendent.[23] As the tribal liaison, her role was to help build the government-to-government relationship between the Cheyenne and Arapaho Tribes and the National Park Service. In particular, she viewed her work as "help[ing] them (the NPS) understand and relay the tribal or Native American point of view."[24] In addition to her duties at Sand Creek Massacre NHS, Karen Wilde had been working with the NPS's Stephen T. Mather Training Center to develop tribal consultation training for program management and superintendents. She had also been working with the Council for Indigenous Relevancy, Communication, Leadership, and Excellence (CIRCLE), the indigenous NPS employee resource group. Wilde also served on a team developing policies and

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[20] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021. National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 110–111.

[21] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 110–111; Kenneth P. Cannon, Johnathan Peart, Jeff C. Campbell, Charles Haecker, and Joseph Lamb, *Results of Archeological Metal Detection Sample Survey within Sand Creek Massacre NHS: Identification of the Big Head Site.* USU Archeological Services, Inc., 2012, 1–15.

[22] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[23] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, *State of the Park Report,* 2017, 40.

[24] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

guidance for sacred sites.[25] As site staff have prioritized Cheyenne and Arapaho involvement and worldview into all levels of management decisions, Wilde was uniquely qualified in her role as tribal liaison.[26] Wilde's point of view as a Native person, strongly rooted in her culture and well versed in federal laws, helped her create relationships between the tribal governments and the NPS and prioritize Cheyenne and Arapaho involvement and worldview in site management and actions. When Wilde took a new position with the United States Forest Service in 2021, the NPS did not seek to fill the position with a full-time permanent liaison; instead, there was a plan to make a permanent cultural position with tribal liaison duties. Wilde as well as other former managers and tribal representatives expressed concern about this plan.[27]

Engagement with Tribal Governments

Site managers underscored an important distinction in the site's enabling legislation and the reality of its relationship and engagement with the Cheyenne and Arapaho Tribes. The enabling legislation mentions three federally recognized tribal nations: the Cheyenne and Arapaho Tribes of Oklahoma, the Northern Cheyenne Tribe, and the Northern Arapaho Tribe.[28] Although the Cheyenne and Arapaho Tribes of Oklahoma operate administratively as a single nation for federal purposes, the Southern Cheyenne Tribe and the Southern Arapaho Tribe are two distinct tribes, each with their own unique cultural practices, traditions, and languages. The historic site recognizes this tribal sovereignty, and this recognition is reflected in the makeup of the site's tribal representatives, who come from all four tribes. This arrangement is described in greater detail below.[29]

Tribal Representatives and Cooperative Agreements

One management strategy the NPS employed to fulfill the site's authorizing legislation and prioritize tribal rights, concerns, and worldview was to establish cooperative agreements with the three federally recognized tribal governments: the federally created Cheyenne and

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[25] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 20, SAND Electronic Records.

[26] Alexa Roberts, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[27] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021; Kiowa County Independent, "Karen Wilde's Long, Long Journey Home," *Kiowa County Independent,* July 21, 2021, 7–9. https://www.kiowacountyindependent.com/images/PDFS/editions/20210721_d2jz85cwsidpxtzp.pdf.

[28] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[29] Alexa Roberts, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Arapaho Tribes of Oklahoma in Concho, Oklahoma; the Northern Cheyenne Tribe in Lame Deer, Montana; and the Northern Arapaho Tribe in Effete, Wyoming. These cooperative agreements began in 2005 but grew out of the cooperative agreements that were established with the tribes during the site location studies in 1999 and the tribes' designations of official representatives when the authorizing legislation was passed.[30] The agreements are renewed annually and establish that the tribes are responsible for designating their official representatives for government-to-government consultation. This enables the NPS to equitably engage with the four tribes associated with Sand Creek Massacre NHS and acknowledge tribal sovereignty. There are eight official tribal representatives to the historic site: The Northern Cheyenne Tribe and Northern Arapaho Tribe each supply two officially designated representatives, and the Cheyenne and Arapaho Tribes of Oklahoma supply four official representatives (two from each tribal government).[31] These tribal representatives regularly consult with site staff and participate in developing educational materials, resource management and education planning, repatriation, and other NAGRPA-related issues.

The three federally recognized tribes have tribal historic preservation officers (THPOs). Under DOI policy and federal regulations, NPS site managers should consult with THPOs for federal undertakings *on tribal lands* where the THPO has replaced the functions of the SHPO. On *non-tribal lands* of historical or cultural significance to tribes, the agency must consult with tribal officials. For tribes that have not assumed responsibilities of a state historic preservation officer (SHPO) or a THPO, the federal agency may consult with a representative designated by the tribe.[32] While the federally recognized tribes have THPOs, they also have designated official representatives to Sand Creek Massacre NHS. The NPS engages with these representatives rather than the THPOs for consultation on Sand Creek Massacre issues. The site's prioritization of a tribally designated representative over a tribe's THPO for consultation has caused some confusion for new site staff members, new tribal representatives, and new tribal historic preservation officers. There has also been some confusion surrounding tribal representatives and THPOs due to the Sand Creek Massacre NHS's collaborative relationship with Bent's Old Fort NHS, and NPS staff's shared support responsibilities for these sites. For consultation

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[30] Cooperative Agreement between the National Park Service and the Cheyenne and Arapahoe Tribes of Oklahoma #R1315080009, 2005, SAND Electronic Records; Cooperative Agreement between the National Park Service and the Northern Arapaho Tribe #R1315080008, 2005, SAND Electronic Records; Cooperative Agreement between the National Park Service and the Northern Cheyenne Tribe #R1315080005, 2005, SAND Electronic Records.

[31] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; "Cooperative Agreement between the United States Department of the Interior, National Park Service and The Northern Cheyenne Tribe, Agreement #H1315110001," 2011, 1–3, 5, SAND Electronic Records; "Task Agreement under Cooperative Agreement Number H1315110002 between The United States Department of the Interior, National Park Service and The Northern Arapaho Tribe," 2012, 1–3, SAND Electronic Records.

[32] "Protection of Historic Properties," 36 CFR 800, 2004.

regarding Sand Creek Massacre NHS, NPS staff engage with the officially designated tribal representatives instead of the tribal historic preservation officer because of the responsibilities outlined in the cooperative agreement discussed above. For Bent's Old Fort NHS, by contrast, NPS staff consult with tribal THPOs.[33] With the tribes' designating their official representatives, the four tribal governments have more equitable engagement with Sand Creek Massacre National Historic Site, and the NPS strengthens its relationship with these tribes by honoring and acknowledging tribal sovereignty.

The national historic site's cooperative agreements outline the responsibilities of the NPS and allow the transfer of funds from the site to the tribes for expenses related to tribal consultation. It is also the NPS Intermountain Region's (IMR) policy to pay for professional fees and travel expenses for tribal participation in government-to-government consultation initiated by the NPS.[34] The cooperative agreements outline use of these funds for the two tribal representatives for lodging, per diem, mileage, and consultation costs associated with travel and attendance at consultation meetings. The funds also are used to distribute information from the NPS to tribal consultants, members, leadership, and other appropriate parties; provide services of tribal crews, resource managers, or specialists to carry out, oversee, or monitor NPS activities on site; and purchase supplies and equipment necessary to carry out the agreements. Details on travel arrangements, information distribution, equipment/supplies, tribal crews, resource managers, and specialists are left up to the tribes to manage.[35]

As discussed in Chapter Two, there is no differentiation in use or management of the federally held property or the property held in tribal trust in these cooperative agreements and NPS planning documents. Tribal trust lands include the primary massacre locations and, consequently, the majority of the site where visitor and administrative services and the repatriation area are located. Tribal trust lands also encompass most of the creek bed, which was designated a sensitive resource area (referred to as a "sensitive resource management zone" in the site's *General Management Plan*). Most of the land that has been developed has been on the tribal trust lands in the already-developed Dawson Ranch headquarters area, which was identified in the authorizing legislation as the priority for NPS acquisition.[36] NPS managers have collaborated closely with the tribes to fulfill the legislation and honor the tribal history at Sand Creek Massacre NHS.

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[33] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[34] "Tribal Consultation Payment Guidelines," National Park Service Intermountain Region, 2011, 1–2.

[35] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; "Cooperative Agreement between the United States Department of the Interior, National Park Service and The Northern Cheyenne Tribe, Agreement #H1315110001," 2011, 1–3, 5; "Task Agreement under Cooperative Agreement Number H1315110002 between The United States Department of the Interior, National Park Service and The Northern Arapaho Tribe," 2012, 1–3; "Cooperative Agreement between The United States Department of the Interior, National Park Service and The Cheyenne and Arapaho Tribes of Oklahoma, Agreement #H1315110003," 2011, 1–3, 5.

[36] The tribes acquired the land during the land acquisition process, and ultimately deeded to the United States.

Tribal Representatives' Perspectives on Sand Creek Massacre National Historic Site and their Relationship with the National Park Service

Descendants can trace their families directly back to the massacre. One example of this is the story of a young Arapaho boy who survived the massacre, was brought back to Denver by Chivington's troops, and eventually was returned to displaced Arapaho people living in Oklahoma. This young boy was given the name Tom White Shirt, and his descendants include Henry Little Bird Sr. the tribal representative for the Southern Arapaho, Cheyenne and Arapaho Tribes, Oklahoma from 2010 to 2016.[37] Little Bird Sr. spoke with the study team in July 2021. He mentioned his personal connection the Sand Creek Massacre through his grandparents and how his family has always known about their connection to the massacre.[38] When he first started in his official capacity as tribal representative, one of the first challenges he faced was a display and exhibit at History Colorado that did not accurately portray the Sand Creek Massacre (described in detail later in this chapter). Henry Little Bird Sr. was also involved with the Sand Creek Massacre mapping project, the research on the location of the creek bed, Spiritual Healing Runs, and a 150th commemoration of the massacre at the site and symposium in Washington, DC, in 2014. Little Bird Sr. considered the symposium held at the National Museum of the American Indian a success and he spoke about how much he valued the opportunity to speak there about his familial connection to the Sand Creek Massacre. As a tribal representative, he felt it was important to talk about these connections at the event. Little Bird Sr. said, "I believe I got to express myself there more than any other place." He continued,

> I was one of the only people that can tell you the names of where I came from out of all the representatives. So that part was important. I thought it was—I thought it was really something that our family knew where and kept track. . . . That was something I got to explain. How we know exactly who we are, you know, and where our family came from.[39]

Little Bird Sr. largely spoke in positive terms about the relationship between the tribes and the NPS. He did, however, express regret at not being able to fundraise and install an archway at the entrance to the site while he was serving as a tribal representative.[40]

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[37] Michael Allen, "A Massacre in the Family | My Great-Great-Grandfather and an American Indian Tragedy," *Wall Street Journal,* November 24, 2014, https://www.wsj.com/articles/my-great-great-grandfather-and-an-american-indian-tragedy-1416855754; Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

[38] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021; Michael Allen, "A Massacre in the Family | My Great-Great-Grandfather and an American Indian Tragedy."

[39] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

[40] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

When asked what he thought about the relationship built between the NPS and the Cheyenne and Arapaho Tribes, Oklahoma, Henry Little Bird Sr. praised the work of Wilde and Roberts, in particular:

> They allowed us to make decisions there. They allowed us to . . . have more say so than any other place we dealt with. The National Park Service, they were really supportive. They gave us everything that they possibly could give to the Cheyenne and Arapaho. They take care of the grounds there and that's really good. We've been out there working with them when they do their surveying for little metal detector stuff—for artifacts. They've traveled with us to every symposium . . . what made it so unique was that they were always on our side. They were—if we were in meetings and stuff they were really supportive . . .—they made a path for the Cheyenne and Arapahos to express their self and to feel better about the Sand Creek.

His advice for future tribal representatives and NPS management was to understand, honor, and respect each other.[41]

Karen Little Coyote, the Southern Cheyenne tribal representative for the Cheyenne and Arapaho Tribes, Oklahoma, from 2010 to 2018, is a descendant of Southern Cheyenne peace chief Black Kettle. Unlike Henry Little Bird Sr., Little Coyote did not learn about the Sand Creek Massacre as a child: "I had no idea what Sand Creek was because my parents didn't talk about it," she said. She didn't learn about the massacre's history until she became a tribal representative. In our interview with Little Coyote, she discussed being a part of the mapping project at the site, participating in repatriations, participating in the 150th commemoration activities in Washington, DC, and traveling and giving talks about the Sand Creek Massacre across the country. Little Coyote mentioned that she faced a few challenges as a tribal representative, including the Sand Creek Massacre display and exhibit by History Colorado. She felt there were good relationships between the NPS staff (especially Alexa Roberts and Karen Wilde) and the other tribal representatives, and she requested that Alexa, who retired, and Karen, who was leaving for a new position in 2021, return to Sand Creek Massacre National Historic Site. Little Coyote expressed some regret at not being able to have a monument erected at the site with the names of the Cheyenne and Arapaho deceased and expressed concern that the dates of the Spiritual Healing Runs were being moved.[42]

Regarding her thoughts about the relationship that had been built between the NPS and the Cheyenne and Arapaho Tribes, Oklahoma, Little Coyote said,

> I thought we had a good relationship when Alexa was there. We had a good communication. I always discussed and talked about, you know, different things that we would like to see at Sand Creek and most of the time we always agreed,

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[41] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

[42] Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021.

> you know, to see betterment of the park. Seems like we didn't have any disagreements. We were all, you know, conversing with each other, talking about things, how to make things better. We just had a good working relationship with the park service employees and the Northern Cheyenne representatives and the, excuse me, the Northern Arapaho representatives.[43]

Her advice to future tribal representatives and NPS management was for everyone to be respectful and kind and communicate and work toward the best interests for all. She noted that everything they did together started with prayer.[44]

Otto Braided Hair is Northern Cheyenne and has been a tribal representative to the site since 1999. He is also a descendent of the massacre. His great-grandfather and great-grandmother were present at the massacre. They both survived; however, his grandfather was wounded in the arm. In a 2023 oral history interview, he recalled that he "was first told of the stories of Sand Creek Massacre when I was about twelve, from my grandfather. He was the youngest of Braided Hair, the one who survived the massacre."[45] Otto Braided Hair became involved with the massacre site in 1998, when he helped coordinate and translate oral history interviews with tribal elders for the Special Resource Study analyzing the feasibility of establishing Sand Creek Massacre National Historic Site. Many of those interviews were told in Cheyenne, and Cheyenne was his first language; as a result, he served as a translator for several interviews. In 1999, he became a tribal representative as well as a coordinator for the Sand Creek Massacre Spiritual Healing Run and Commemoration. As tribal representative, he opened an office that was "kind of like a hub for information regarding the massacre site" and where he "coordinated teleconferences with the other tribes, with the state, and even on a federal level [with] Senator Nighthorse who sponsored a number of the bills. So it was like the hub of the work." It was also the location from which he organized the first Spiritual Healing Run.

Otto Braided Hair recalled that his experience as a tribal representative was educational and a period of "personal growth and understanding. I was unhappy with non-tribal members, non-Indians. But if—yeah, it changed":

> So, the emotion was pretty intense when I first heard the story. And so I became pretty bitter. Bitter. And for a number of other reasons, I was already bitter. We just haven't been treated good. The tribe has just never been treated good from the dominant culture. You know, Christianity and of course Sand Creek is an example of Christianity. So just added to, added to my worldview of Christians and dominant culture. Non-Indian whites, you know.

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[43] Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021.

[44] Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021.

[45] Otto Braided Hair, interview with Angela Sirna, February 9, 2023.

> But I got exposed to the Evans descendants, their families. Then after that, Methodist Church. So that experience changed me. Helped me to see that, understand that not everybody's a Chivington. Not everybody's Custer. And so forth. But, yeah. More, more growth. Personal growth.

Braided Hair's comments underscore the importance of site management's approach to working with the tribes. By establishing a relationship grounded in respect and true partnership, Sand Creek Massacre National Historic Site's staff have built a level of trust that was missing from NPS-tribal relationships for most of the agency's history.

Consultations

The site has worked in close coordination and consultation with representatives and governments of the Northern and Southern Cheyenne and Arapaho Tribes in the development of every park planning document, resource stewardship project, and interpretive event since 1998.[46] NPS planning documents provide details about many of these consultations and coordination efforts. Here, we focus on consultations that were emphasized by individuals we interviewed for this administrative history. In particular, interviewees emphasized the significance of consultations related to an exhibit at History Colorado to commemorate the 150th anniversary of the massacre, consultations related to the "Big Head Site" and the development of the site's interpretive themes, and consultation for development of Monument Hill. These consultations are summarized below.

History Colorado 150th Commemoration Exhibit Consultations

During the November 2011 Spiritual Healing Run, members of the Northern Cheyenne Tribe realized that History Colorado was far along in exhibit designs for a display on the Sand Creek Massacre at History Colorado's new building in Denver. Joe Fox Jr., the vice president of the Northern Cheyenne Tribe, wrote to Colorado State Historian William Convery to remind him of the federal legislation regarding development and management of Sand Creek Massacre NHS. That December, the National Park Service organized a consultation meeting in Billings with tribal representatives. History Colorado was also in attendance to consult on their exhibit "Collision: The Sand Creek, 1860s–Today."[47] Tribal representatives expressed serious concerns that History Colorado had not consulted with

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[46] Alexa Roberts, "Site Planning Document for the General Management Plan," 2016, 3, SAND Electronic Records.

[47] See William Convery III, "Colorado Stories: Interpreting History for Public Audiences at the History Colorado Center," Ph.D. dissertation, University of New Mexico, 2012.

them to develop the content for the exhibit. The tribes objected to History Colorado using quotes out of context and presenting the massacre in a way that was not historically truthful nor sensitive to the trauma that was inflicted on the tribes.[48]

After the 2011 consultation, History Colorado staff made some changes and opened the exhibit in 2012. The exhibit, however, still contained errors and demonstrated poor research and understanding of the massacre, its historical context, and the importance and sensitivity of the massacre to Cheyenne and Arapaho people. Joe Fox Jr. requested that the exhibit be closed for meaningful consultation; however, History Colorado kept the exhibit open despite repeated requests. This "non-response response" by History Colorado was deeply hurtful to the tribes and damaged their relationship with the State. The exhibit was closed in June 2013.[49] Since then, meaningful consultations have been ongoing. The NPS has played a role in these meetings, helping to facilitate discussion, take notes, and provide technical assistance and expertise. Alexa Roberts described the relationship between the tribes, the National Park Service, and History Colorado as "always [being] at the table together. We always include History Colorado staff in our consultation meetings and they do the same and the tribes want it that way."[50] As a result of these efforts, History Colorado staff now have a better sensitivity to and understanding of what the massacre means to the descendants, which has improved the relationships between the tribal representatives and History Colorado. The exhibit remained closed while these consultations took place, and a new exhibit opened in November 2022.[51]

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[48] Alexa Roberts and Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021; Sand Creek Massacre National Historic Site, "Billings Consultation Meeting: Summary Notes," December 14, 2011, document pages 13–19, notes pagination 1–7, SAND Electronic Records; Patricia Calhoun, "A Century and a Half Later, the Wounds of Sand Creek Are Still Fresh," *Westword*, February 14, 2013, https://www.westword.com/news/a-century-and-a-half-later-the-wounds-of-sand-creek-are-still-fresh-5119582?showFullText=true; Joe Fox Jr., letter to William Convery, December 5, 2011, SAND Electronic Records.

[49] Patricia Calhoun, "A Century and a Half Later, the Wounds of Sand Creek Are Still Fresh," *Westword*, February 14, 2013, https://www.westword.com/news/a-century-and-a-half-later-the-wounds-of-sand-creek-are-still-fresh-5119582?showFullText=true; The Associated Press, "History Colorado Center Closes Sand Creek Massacre Display," *The Denver Post*, August 27, 2013, https://www.denverpost.com/2013/08/27/history-colorado-center-closes-sand-creek-massacre-display.

[50] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 19, 2021.

[51] History Colorado, "Core Exhibition: The Sand Creek Massacre: The Betrayal that Changed Cheyenne and Arapaho People Forever," November 19, 2022, https://www.historycolorado.org/exhibit/sand-creek-massacre-betrayal-changed-cheyenne-and-arapaho-people-forever; Patricia Calhoun, "New Sand Creek Massacre Exhibit at History Colorado Gets NEH Boost," *Westword*, April 17, 2021, https://www.westword.com/news/sand-creek-massacre-history-colorado-hickenlooper-national-endowment-humanities-11946216; Alexa Roberts and Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Chantalle Hanschu, correspondence between Chantalle Hanschu, Colorado Commission of Indian Affairs, and a consultation group of tribal representatives, NPS employees, and state employees on the History Colorado Sand Creek Massacre exhibit for the 150th commemoration with two attachments, 2014, 4–5, SAND Electronic Records; National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review,* 2014, 2; Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021; Tribal Representatives and Karen Wilde, "Suggested Outline of Exhibit Design and Information To Do Before November 2014," March 18, 2014, Handwritten notes on document by Karen Wilde, April 28, 2014, 1–3, SAND Electronic Records.

The new exhibit, entitled "Sand Creek Massacre: The Betrayal that Changed Cheyenne and Arapaho People Forever," is presented from the Cheyenne and Arapaho perspective, and they approved each component of the exhibit ahead of its opening.

Consultation for the "Big Head Site" and the Development of Interpretive Themes

Some background history is necessary to understand how the NPS and tribes worked together to develop interpretive themes for Sand Creek Massacre National Historic Site. This history is documented in detail in Ari Kelman's 2013 book *A Misplaced Massacre: Struggling over the Memory of Sand Creek* and also Jerome A. Greene and Douglas D. Scott's 2006 book *Finding Sand Creek: History, Archaeology, and the 1864 Massacre Site*.[52] A brief summary is provided here, but readers are encouraged to consult these sources for additional details about this history.[53]

During and after the 1999–2000 NPS site location study, there was a great deal of controversy about the location of the Cheyenne and Arapaho village site (often misrepresented as "the massacre site") within the larger massacre site. The tribes and the NPS came to different conclusions about the village site location, and their disagreement centered around which lines of evidence each party deemed most authoritative. This disagreement was further complicated by neighboring landowners' claims that they had found irrefutable evidence of the site further upstream from the two different site locations identified by the NPS and the tribes.

These competing arguments played out very publicly in the press. They were intertwined with widely differing positions about the veracity of one line of evidence over another, whether the evidence pointed to an indefensible massacre or a justifiable "battle," and ultimately whose intellectual and cultural authority would dictate how the story would be presented to the public. The NPS's confidence in the village site location was based on archeological evidence, a military map drawn by Lt. Samuel Bonsall, and other historical primary source documents. The tribes' conclusion about the village site location came from generations of oral history, the eyewitness documentation of a half-Cheyenne relative, George Bent, who survived the massacre and years later wrote and drew maps of the village site, and spiritual experiences on the site that confirmed their cultural knowledge.

In the period between the 1999–2000 site location study and the 2007 establishment of Sand Creek Massacre National Historic Site, the NPS did not publicly address conclusions about the specific village site location. Staff did not begin developing an interpretive

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[52] See Kelman, *Misplaced Massacre*, and Jerome A. Greene and Douglas D. Scott, *Finding Sand Creek: History, Archaeology, and the 1864 Massacre Site* (Norman, Oklahoma: University of Oklahoma Press, 2006).

[53] This section was written primarily by former SAND superintendent Alexa Roberts. Roberts helped delineate and clarify the many threads that made up this controversy and series of consultations. Email correspondence from Alexa Roberts to Angela Sirna, Laura Miller, and Janet Frederick, May 2, 2023.

program while site location issues were still so emotionally, physically, and intellectually contested; doing so would have implied taking a position on tribal cultural authority and even on whether or not Sand Creek was a massacre or a "battle." The NPS never wavered on "battle" versus "massacre" language—after all, "massacre" was in the title of the national historic site's legislation—yet local and national public opinion on the issue remained heated.

The local landowners who asserted that the "real" site was found on their property upstream from where the NPS and the tribes determined it to be had developed a large following of individuals, members of military history organizations, researchers, and authors who supported their conclusions about the site, especially that the site represented a justifiable battle and not a massacre of innocent men, women, and children by the United States Army. In 2005, a public panel discussion held in Eads among tribal representatives, NPS representatives, and Kiowa County leaders, organized by a university history seminar, erupted into conflict and controversy and inflamed the ire of the "battle" adherents. As establishment of the national historic site drew nearer, pressure mounted on Kiowa County leaders to ensure that the NPS's alleged "revisionist history" and "kowtowing to political correctness" would not be allowed to prevail once the site was established. NPS staff held firmly to their reliance on primary source documentation, including eyewitness accounts, testimonies, diaries, letters, reports of congressional and military investigations, and maps, as a basis for its messaging about the massacre.

By the time the national historic site was officially established in 2007, the NPS was ready to initiate the general management planning process. The NPS remained explicit and unwavering about the facts of the massacre, but staff still avoided explicit references to the location of the village site due to lack of concurrence between the tribes and the NPS. It was clear, however, that these issues of interpretation would have to be resolved for the development of interpretive and educational programs for the site.

Superintendent Alexa Roberts met with the NPS Intermountain Region's director and other regional office representatives to talk about a way to approach interpretation. They discussed having neutral Sand Creek scholars act in an advisory capacity to the NPS regarding which written materials, references, documentation, and popular accounts could reliably guide the site's future interpretive and educational programs. Inviting a neutral third-party advisor into the process seemed like a reasonable solution to perceptions that the NPS was engaging in "revisionist history."

The NPS hired Colorado historian Patricia Limerick to lead the effort. Limerick was well known and highly regarded for her years of work negotiating contested and controversial issues. In the summer of 2008, the site hosted a meeting of tribal representatives and Limerick to propose this approach. As historian Ari Kelman has documented in *A Misplaced Massacre*, tribal representatives interpreted the NPS's intentions as though the NPS was questioning whether to interpret Sand Creek as a massacre or a battle. The

meeting was extremely divisive, and the NPS abandoned its approach and put the development of interpretation on the back burner. The *General Management Plan* was undertaken without addressing interpretive themes—a decision that was controversial among NPS Regional Office staff. Superintendent Roberts recalled that she had to explain and defend the decision at a large and somewhat heated meeting at the Regional Office.

Because the volatility around the "battle" versus "massacre" language germinated during the 1999–2000 site location study, and because there had never been concurrence between the tribes and the NPS about the village site location, Roberts and her staff decided to pick up where the site location study left off in the aftermath of this controversy. They sought to continue investigating and mapping the physical properties of the massacre site and fill in the gaps of what had already been learned. Planning for what Roberts described as a "Site Location Study 2.0" began in 2008 and continued over the next year and half. The project became loosely known as "The Mapping Project" and was formally launched in 2010. Through the former Cooperative Ecosystems Study Units (CESU) program, the NPS contracted Utah State University to identify gaps in the data that would allow the NPS and tribal representatives to come closer to agreement on the village site location and develop a research design for additional archeology that would hopefully fill in some of the data gaps. The project began on May 2, 2010.

Meanwhile, an informal group of NHS staff and historians with long-standing relationships with the Cheyenne and Arapaho Tribes—a group that eventually became known as the "Subject Matter Expert Team" (Dr. Gary Roberts, Dr. David Halaas, Tom Meier, Jeff Campbell, and park ranger Craig Moore)—began researching and documenting what they knew from primary source documentation including testimonies, military records, diaries, letters, oral histories, and maps. In April 2010, they developed an agenda for a "mapping workshop" that included tribal representatives, the "subject matter expert team" members, Utah State University contractors, NPS regional specialists, and others to gauge endorsement of the approach and to mobilize the research project.

One of the members of the subject-matter expert team, Jeff Campbell, was also a seasonal ranger and volunteer for the NHS who had been conducting research of historic maps of the massacre site area. Campbell realized that the headgates of a major irrigation system constructed around 1910 (named the Chivington Canal) was at the north end of what was known as the Dawson Bend in the creek—between where the NPS determined the village site was and where the tribes believed the village to have been (there was a difference of about three-quarters of a mile between the two interpretations). This man-made anomaly in the landscape led Campbell to hypothesize that the construction of the canal could have affected the hydrology of the stream channel, possibly changing the course of the creek since 1864. His hypothesis (described at length by Kelman in the epilogue to his book) was presented at a kick-off meeting of the "Mapping Project" at the NPS Regional Office on December 7, 2010. The NPS regional GIS program had been

working on overlaying or reconciling the historic maps collected by Campbell with the current maps developed by NPS during the site location study in 1999–2000, with a focus on the Dawson Bend of the creek. Based on the maps presented during the meeting, Campbell introduced the possibility that the bend in the creek as it appears today may have shifted somewhat since 1864, resulting in the discrepancies between where the archeological evidence was found and the crux of the current bend where the tribal representatives understood the village site to have been.

Researchers continued multi-disciplinary investigations into this possibility throughout the following year. One of their lines of inquiry was to try to archeologically verify some of the locations within the larger massacre site boundaries mentioned in eyewitness accounts, diaries, and testimonies. Pinpointing the locations of individual incidents mentioned in eyewitness accounts could theoretically help to triangulate the location of the village site itself. One of these incidents described by several eyewitnesses was an intense fight between Army troops and about 30 men accompanying the Cheyenne warrior Big Head, which was described as having taken place west/southwest of the escarpment west of the creek.

Utah State University, as part of its contract with the NPS, designed and implemented a metal detector survey in 2011 to search for archeological evidence of this incident. Tribal consultation about the planned project took place on August 3, and archeological fieldwork dates were set for October 14–18, 2011. A scope of work was developed, identifying the area as Sections 24 and 25 within the park and the eastern portions of adjacent Sections 23 and 26, which are outside the park boundary, encompassing in total about 320 acres. The results of the survey were inconclusive regarding the specific location of the Big Head fight; however, in the 5-day project the team was only able to survey about a third to a half of the likely 320-acre area within which the incident occurred. A second and far more conclusive 2014 metal detector survey of approximately 125 acres in Section 13, T17S R46W accomplished what the original Big Head survey intended to accomplish, providing archeological evidence corroborating primary source documentation about the locations of specific individuals on the ground during the massacre.

Figure 9: Metal detection survey at Sand Creek Massacre National Historic Site, September 2014.
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

The NPS continued to pursue other lines of evidence throughout 2011 and into 2012, including collection of LiDAR ("light detection and ranging" or "laser imaging, detection, and ranging") aerial imagery; reconciling historic maps, geomorphological cross-sectioning of the Big Sandy creek floodplain, and ongoing analysis of primary source documents. Although multiple investigations continued well into 2012, by May of 2011, this approach had already proved invaluable in reconciling the discrepancy between the NPS's determination of the village site location based on archeology, and the tribal understanding of the village site location based on oral history and tribal traditional and ceremonial methods. As Kelman described in-depth in *A Misplaced Massacre*, between May 17 and 20, Arapaho and Cheyenne representatives, subject-matter experts and NPS representatives met together at the massacre site to discuss the implications of a change in the stream channel configuration after the construction of the canal. The group arrived at a long-awaited epiphany: If the bend in the creek had been larger and broader in 1864, it would explain the discrepancy between the archeological evidence the NPS relied on and the Bent map and traditional spiritual methods the tribes relied on to conclude where the village site had been located.[54] In short, all lines of evidence used by both parties to determine the site location would be correct.

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[54] Kelman, *A Misplaced Massacre*, 276–277.

Data collection and analysis continued into 2012. Ultimately, it was determined that, although the construction of the canal had not significantly changed the course of the stream since 1864, re-examining the shape of the bend in the creek turned out to be solution to the dilemma that had existed since the site location study of 1999–2000; it was a matter of scale. Expanding the scale of Big Sandy Creek from its headwaters to its terminus revealed a much larger, sweeping bend, containing the smaller "Dawson bend" at the massacre site within it. Thus, all explanations were correct—the historic maps showing the village site location, the archeological evidence, the tribal traditional methods. This brought an end to 12 years of disagreement.

At a large tribal consultation meeting in the conference room at the national historic site in May 2013, the past 2 years of investigations were presented and reviewed. With a map of the national historic site boundaries hanging on the wall, at the end of all the discussion and presentations, superintendent Roberts tentatively approached the map with a marker and asked the assembled group if they concurred that the village site location could be committed to a map for public interpretation for the first time. The room was basically silent until one of the tribal representatives shrugged and said "yeah," and everyone agreed. Roberts and Karl Zimmermann each breathed a silent 6-year-old sigh of relief: For the first time since the national historic site's establishment, formal interpretation, including a site map showing the features of the massacre site, could finally begin.

In January 2016, the first Long Range Interpretive Plan workshop was convened at History Colorado in Denver, facilitated by former NPS Planner and independent consultant Rick Jones. Participants included representatives of the tribal representatives to the Sand Creek Massacre NHS, NPS staff, and staff from History Colorado (the Colorado Historical Society). A second workshop was held at the national historic site in May 2016, to finalize the collaboratively developed interpretive themes.[55]

The Interpretive Wayside Exhibit Plan, under the direction of Bent's Old Fort Chief of Interpretation Rick Wallner, was undertaken during and following the preparation of the Long Range Interpretive Plan. In 2017, after the 2015 acquisition of Section 36 by the National Park Service, an interpretive pull-off and wayside were installed along Chief White Antelope Way overlooking the landscape.[56] The three-panel interpretive wayside presents the events leading up to the massacre and includes topics such as the meeting at Camp Weld between Cheyenne and Arapaho peace chiefs with Territorial Governor John

[55] The plan was finalized in March of 2018 and updated in 2020 (outside of the scope of this administrative history).

[56] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Evans, the movement of Cheyenne and Arapaho to Fort Lyon, and events that led to their encampment in the area of Sand Creek. The wayside also describes the night movement of Chivington's forces to Sand Creek from Fort Lyon.[57]

The information contained on the wayside reflects site staff's new understanding of the massacre. Research conducted by park staff in collaboration with subject-matter experts and tribal representatives between 2007 and 2017 uncovered evidence that changed the management of cultural resources and interpretation at the site, including the knowledge of how the troops moved toward the site of the massacre.[58] The troops are no longer thought to have approached over the Monument Hill area, as was hypothesized in the site location study (2000), but rather from Section 36.[59]

Consultation for Development of Monument Hill

Cheyenne and Arapaho Tribes were consulted when the NPS was planning for improvements to the Monument Hill area in 2017. The design of the improvements considered tribal needs for commemoration activities and ceremonial use. As a result of these consultation meetings, improvements to Monument Hill included space for processions and tipis and a capped flagpole insert to fly a 33-star flag, like the one Chief Black Kettle flew in 1864, for tribal commemoration of the massacre and ceremonies. The improvements also supported the annual Spiritual Healing Run, which started at Monument Hill in 2007.[60] The improvements were implemented in 2018.

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[57] Photo taken of the wayside by the study team during the site visit on in May 2021; National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 33, 52.

[58] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 14, 29, 37 specifically mentioned data and GIS needs for Section 36; National Park Service, *State of the Park Report,* 2017, 33; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7-4, the maps on 7-17 and 7-19, 7-21, 8-36 represent what was considering to be the approach of Chivington's troops at Sand Creek. This understanding has been subsequently modified with new evidence.

[59] Sand Creek Massacre National Historic Site, Unigrid, "Attack at Dawn," 2017. Hard copy on file at the Denver Service Center.

[60] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Building Relationships

While there have been many successes, relationships between the NPS and tribes have not always been smooth. There have been differences of opinion, difficult conversations, and missteps in communication, and challenges of this type will undoubtedly persist in the future.[61] NPS staff and tribal representatives shared several successes and challenges that offer future managers guidance for maintaining these relationships.

Former NPS site managers Alexa Roberts and Karl Zimmermann credit the NPS's successes in building relationships with the tribes (and the local community) to the value of mutual respect and to the length of their tenure at the site. The mutual respect and approximately 20 years of working together allowed all parties to get to know each other beyond a formal government-to-government relationship. Over time, many of the formal and informal partners and other people associated with Sand Creek Massacre NHS came to regard each other as friends.[62]

While formal consultations have occurred with tribal representatives, site managers and staff have also worked to build relationships with the tribes outside formal consultation activities. These relationship-building events have included communal meals and informational talks, with tribal representatives organizing these events and NPS site managers assisting them by providing food, space, or other support (such as staff for informational talks).[63]

In one anecdote from the early years of her tenure, Karen Wilde recalled SAND staff and her family helping to supply a large turkey dinner for the runners participating in the Spiritual Healing Run. Unfortunately, a circuit breaker tripped in the Eads community building where they were roasting the turkeys, and only two turkeys were cooked. Thinking quickly, Wilde, her family, and site staff found other ways to cook the remaining turkeys. The turkeys were still cooking as the runners arrived, but everyone was able to eat. Years later, tribal representatives would still playfully tease Wilde about the incident. They'd ask her, "you cooking turkeys today?"[64]

Sharing knowledge and resources, particularly regarding the site manager's work on natural resource preservation and landscape restoration, helped establish mutual respect and understanding as tribal representatives and NPS site managers worked toward a common goal. One such example was a project to reduce fuel loads by removing dead cottonwood trees from the riparian zone of Big Sandy Creek, which is one of the site's

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[61] Rhonda Brewer, Handwritten notes on topics such as: Chivington Canal, ethnobotany study, archeology, traditional methods of site location identification, meeting with Alexa after Cultural Mapping Meeting, and the Bowen Collection, 2011, 1–6, SAND Electronic Records.

[62] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[63] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[64] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

primary cultural landscape features. As a result of flooding in 1997 and 2007, the fuel load had piled up against living plains cottonwood trees, some of which tribal representatives considered "period trees" or "potential witness trees." These living plains cottonwood trees are of various ages and diameters and are extremely sensitive to fire. The removal of the fuel load would have interdisciplinary benefits such as removing wildfire danger to the cultural and natural resources, protecting the cultural viewshed for visitors, strengthening the site's relationship with the Cheyenne and Arapaho Tribes, and meeting the enabling legislation's goals to protect and preserve the site as closely as practicable to the landscape as it appeared at the time of the massacre.[65]

The fuel load reduction project necessitated consultation with the Cheyenne and Arapaho Tribes who determined that protecting natural resources by reducing the hazardous fuel load was a priority. The project employed Northern Cheyenne and Southern Cheyenne fire crews. The tribal crews provided spiritual guidance as well as labor on the project and determined what could be moved, with recommendations from NPS natural resource staff. Once removed from the riparian area, logs and other fuels were used by the tribes during special events or by local residents for firewood.[66]

Figure 10: Northern Cheyenne and Southern Cheyenne fire crews remove dead cottonwood trees from the Big Sandy Creek riparian zone to reduce hazardous fuel loads at Sand Creek Massacre National Historic Site in 2012.
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

[65] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #142946.

[66] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #142946.

During development of the *General Management Plan*, a series of consultation meetings took place between the National Park Service and the Cheyenne and Arapaho Tribes. Some of these meetings included missteps. One such misstep, an omission of tribal representation, occurred during an October 2007 general management plan meeting with the tribes where Joe Big Medicine (tribal representative for the Southern Cheyenne) and Steve Brady (tribal representative for the Northern Cheyenne) were present. As Big Medicine reported to Governor Darrell Flyingman; Lt. Governor Harvey Monetathchi; and Erica Hart-Whitecloud, Executive Director of Administration for the Cheyenne and Arapaho Tribes, Oklahoma, there was no Arapaho representation at the general management plan consultation meeting. In November 2007, Richard D. Williams, a Legislator from Arapaho District #1 from the Cheyenne and Arapaho Tribes of Oklahoma, asked Sand Creek Massacre NHS Superintendent Alden Miller why he and the other officials of the Cheyenne and Arapaho Tribes of Oklahoma were not notified of the meeting. Williams also provided guidance on who to invite to future consultation meetings.[67] The cause of this omission is not clear in the available documents, but it was rectified as full participation of the tribal representatives occurred in later meetings.[68]

Additionally, as part of the early general management planning process, a meeting was held in 2008 with the tribal representatives and park staff. Site Superintendent Alden Miller, Alexa Roberts, and Karl Zimmermann were all in attendance, as well as Tom Thomas of the Denver Service Center who was leading the general management plan planning process. Representatives from each tribe attended, along with David Halaas (a consultant for the Northern Cheyenne tribe) and Steve Chestnut (an attorney representing the Northern Cheyenne representatives). Finally, University of Colorado Professor Patty Limerick was also present, along with two of her students. The meeting was convened to discuss the development of interpretive themes as part of the *General Management Plan*.[69] Chapter Six describes this challenging meeting and its resolution in greater detail.

Another topic of discussion between tribal representatives and NPS staff was the continued presence of the historic granite and concrete marker on Monument Hill. Installed in 1950, this marker perpetuated the State of Colorado's persistent

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[67] Joe Big Medicine, tribal representative for the Southern Cheyenne to Darrell Flyingman, Governor, Harvey Monetathchi, Lt. Governor and Erica Hart-Whitecloud, Executive Director of Administration for the Cheyenne and Arapaho Tribes, Oklahoma regarding attendance at an October 2007 General Management Plan Consultation, October 24, 2007, 2, SAND Electronic Records; Richard Williams, correspondence between Richard Williams, SAND Tribal Representative and Legislator (Cheyenne and Arapaho Tribes, Oklahoma) and Sand Creek Massacre NHS Superintendent Alden Miller Regarding an October 2007 General Management Plan Meeting, November 1, 2007, 1, SAND Electronic Records.

[68] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, Appendix B: Consultation Letters, 199–251.

[69] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

mischaracterization of the massacre as a "battleground."[70] New tribal representatives and new site staff regularly asked about the marker. Tribal representatives such as Otto Braided Hair expressed a desire to have the marker moved; it was considered for removal during the 2011 resource stewardship strategy (RSS) planning process, but the marker remained in its original position until 2023 (outside the time period of this study).[71] NPS managers considered installing interpretive text near the marker to explain its continued presence and how and why it mischaracterized the massacre. One reason the marker was not moved during the time period of this study is because it was frequently used by tribal visitors as a location to place offerings for the ancestors. NPS staff encouraged use of the repatriation area, rather than the monument, as an appropriate location to place such offerings; however, staff members did not discourage this use at the marker.[72] These discussions continued for several years until the marker was finally removed in 2023 following a Section 106 determination process.[73]

To support the practice of leaving offerings, Sand Creek Massacre NHS developed an offerings policy with tribal representatives over the period from 2005 to 2014.[74] The policy categorized items left at the site and provided guidance about how they should be handled, managed, or deposited in accordance with its category. In general, items left at the park were scheduled to be cleared monthly at the direction of site management. When visitors left unusual amounts of money or items that detracted from the site, those items were removed immediately.

Offerings such as colored cloth "prayer ties" had been placed at the marker, left in shrubs, or tied to the shade structure on Monument Hill. However, the National Park Service encouraged offerings to be left in the repatriation area. As part of post-2017 improvements to the Monument Hill area, a post-and-rail fence that initially surrounded the repatriation area was removed. Tribal liaison Karen Wilde recommended that a portion of the fence at the entrance to the repatriation area be left in place to provide space for offerings left at the site. In her role as tribal liaison, Wilde would sometimes move or

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[70] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 17.

[71] National Park Service, *Sand Creek Massacre National Historic Site: Resource Stewardship Strategy*, 2011, 49, notes that consultation had occurred with the tribes and a determination was made for the RSS to retain monument and wording of the marker. Details of Otto Braided Hair wanting to have the marker moved came from personal communication with site staff during the site visit on May 19, 2021.

[72] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[73] "Historic Monument Marking Sand Creek Massacre Site Since 1950 Removed by Government," *Kiowa County Independent*, June 13, 2023, https://kiowacountyindependent.com/news/3699-historic-monument-marking-the-sand-creek-massacre-site-since-1950-removed-by-government.

[74] Sand Creek Massacre National Historic Site, *Policy Directive #14: Items Left at the Monument or Anywhere Within the Park*, December 1, 2014, SAND Electronic Records.

remove offerings left at the site if they posed a threat to visitor safety (e.g., falling from the shade structure) or impacted the contemplative atmosphere of the site. Coins left by visitors were gathered up and deposited in the site's donation box.[75]

Repatriation Area

A distinctive feature of Sand Creek Massacre NHS is the presence of a designated repatriation area where human remains and objects associated with the massacre are returned to the site and interred. The enabling legislation mandates that the NPS dedicate a portion of federal land at the site as a repatriation area for the interment, reinterment, preservation, or other protection of Native American human remains, associated and unassociated funerary objects, sacred objects, and objects of cultural patrimony associated with the Sand Creek Massacre. Items may be repatriated under the Native American Graves Protection and Repatriation Act or under any other provision of law.[76] The establishment of the repatriation area as well as protocols and processes associated with the management and interment of individuals further emphasize the close relationship between the Cheyenne and Arapaho Tribes and NPS site managers.

General Management

Site managers have interpreted the legislation and managed the repatriation area as a non-active cemetery, meaning it is to be used only for repatriation burials. It is important to note that the tribes do not consider interment in the repatriation area as a "reburial"—since their ancestors were never buried after the massacre, interment in the repatriation area is considered the first burial. Additionally, tribal representatives have questioned the term "funerary objects," because the repatriated objects were associated with living people rather than with a deceased person who was buried. Trying to define funerary objects when no funeral services were held for the deceased, and determining if or when an object was with a person who was killed or with a person who survived the massacre is nearly impossible. Furthermore, the site accepts repatriated human remains or objects on behalf

[75] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[76] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

of the tribes, with the tribes initiating the interment and retaining intellectual and spiritual custody of the remains and objects. The site only assumes physical custody and maintains interment information in a non-public NPS database.[77]

Sand Creek Massacre NHS facilitates repatriation processes of human remains and items from the massacre on behalf of the tribes so that they may finally be returned and interred at the site according to proper ceremonial protocols. The NPS is not involved in the process of repatriation of remains to the tribes until the actual interment at the site. When contacted by individuals or institutions who possess human remains that may be Sand Creek massacre victims, the NPS instructs those individuals to bring the remains to the site. Tribal representatives also may bring remains that have been repatriated to them for proper interment at the site. The site accepts the physical custody of the remains on behalf of the Cheyenne and Arapaho Tribes at Bent's Old Fort NHS, where the curatorial storage facility is located, until a burial ceremony can take place at Sand Creek Massacre NHS. The NPS did not have any human remains or objects that met NAGPRA definitions from Sand Creek in its collections; the human remains or other objects that have been repatriated to the tribes have come from other institutions that have complied with NAGPRA, or from private individuals who had objects from Sand Creek that had been passed down to them through their families and were thus not subject to NAGPRA. The National Park Service, however, only accepts physical custody, not intellectual custody, and the museum management documents reflect this unique custody arrangement with the tribes.[78] While NAGPRA compliance is considered complete at the point of repatriation of the victims' remains from the non-NPS repositories, Superintendent Alexa Roberts and the IMR NAGPRA program felt that the NAGPRA process was not complete until the NPS fulfilled its obligation to establish a repatriation site and bury repatriated ancestors.

In 2013, site managers developed an interment protocol for burials in the repatriation area in consultation with tribal representatives.[79] In 2014, the site created a repatriation site management plan that included information on the use of geographic information system (GIS) for managing repatriated human remains, park materials related to repatriation, a

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[77] Janet Frederick, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Molly Boeka Cannon, *Plan for Repatriation Site Management at Sand Creek Massacre National Historic Site,* Utah State University, 2014, 9; Sand Creek Massacre National Historic Site, *Sand Creek Massacre National Historic Site Interment Protocol,* 2013, 3.

[78] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021. SAND uses a modified version of the NPS's DI 10-830 Deed of Gift form that omits the language about intellectual ownership of donated materials. An example of the NPS's DI 10-830 form can be found at https://www.nps.gov/badl/getinvolved/upload/BlankDeedofGift.pdf.

[79] Sand Creek Massacre National Historic Site, *Sand Creek Massacre National Historic Site Interment Protocol,* 2013, 1–5, SAND Electronic Records; Karen Wilde, email to Tribal Representatives, December 1, 2011, SAND Electronic Records. Electronic files also contain the 2011 interment protocol draft and the final version, dated March 6, 2013.

protocol for repatriating human remains, documented burials (as of 2011), and NAGPRA notices of inventory completion.[80] The regional office recommended the use of brass pins with engraved numbers to mark the burials, but the brass pins were not implemented.[81]

Burials at Sand Creek Massacre National Historic Site are not meant to be public. Apart from the repatriation of human remains from the Smithsonian in 2008, the National Park Service has not issued any press releases or public announcements. Since burials are infrequent, they are not part of the site's annual operating budget. The site has provided cottonwood or cedar boxes for burials, and if requested by the tribes, an osteologist may be brought it to identify the sex of the human remains for the tribe to arrange for appropriate burial goods to accompany the ancestor.[82]

Establishment of the Repatriation Area

In 2005, NPS archeologists Jan Orcutt and Cynthia Herhahn met with Superintendent Alexa Roberts and tribal NAGPRA representatives Joe Big Medicine (Southern Cheyenne) and William Lee Pedro (Southern Arapaho) to discuss and conduct testing for a repatriation and burial area, located on a bluff southeast of the massacre site. This location, near Monument Hill and the Bluff Trail, was proposed because the area did not appear to match any description of the areas from which Chivington's troops attacked Black Kettle's village. Joe Big Medicine and Lee Pedro specified the desired size, shape, and orientation of the proposed repatriation and burial area and marked its general location with pin flags. The area they laid out was a square area measuring approximately 5,700 square meters. The corners were adjusted until an area approximately 75 meters on a side was established.[83]

Shovel tests were spaced at 25-meter intervals, and visual inspection, though hampered by vegetation cover, did not identify archeological materials. Joe Big Medicine and Lee Pedro remained present during the entire process of laying out and excavating the shovel tests and provided guidance on the final definition of the area to be tested. The shovel testing did not find any artifactual evidence of troop movements, encampment, or deployment of mountain howitzers, further corroborating the documentary evidence in the site location study.[84] Orcutt and Herhahn concluded that excavation for repatriation or burial activities would not likely affect cultural resources and recommended that an

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[80] Cannon, *Plan for Repatriation Site Management at Sand Creek Massacre National Historic Site*.

[81] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[82] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[83] National Park Service, Intermountain Cultural Resources Management Archeology Program, *Archeological Investigations at Sand Creek Massacre National Historic Site October 12–13, 2005,* by Cynthia L. Herhahn and Janet D. Orcutt, 2015, 6, SAND Electronic Records.

[84] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

archeologist be present during excavation for burial activities.[85] A digital grid was laid out by an anthropological team, headed by Ken and Molly Cannon from Utah State University, as part of the 2010 mapping project to create the burial plots. The grid was provided to the park's Tribal Liaison to keep track of where individual interments were made.[86]

Interments in the Repatriation Area

For burials, the tribes arrive at the site after the site has closed to the general public. The evening before the burial, the tribes set up a tipi in the visitor use area, near the developed and administrative area of the site, and tribal members stay up all night holding a vigil over the ancestor's remains. Site staff also stay overnight with the tribes. The burial takes place the next day while the site is closed to the general public.[87]

Interments in the repatriation area began on June 8, 2008, with five of the six ancestors who were repatriated to the Cheyenne and Arapaho tribes under NAGPRA.[88] The completed NAGPRA inventories were published in the *Federal Register*.[89] The repatriated ancestors were returned by the Denver Museum of Nature and Science, History Colorado, and the University of Nebraska. The remains of the sixth ancestor were given by a Ute tribal member to Southern Cheyenne Chief Laird Cometsevah who brought the remains to the site for interment by Southern Cheyenne Chief Gordon Yellowman.[90] Consultation meetings for interment took place in Lamar, Colorado, and the NPS provided meals to participants.[91] On June 1, 2008, the Northern and Southern Cheyenne and Arapaho Tribes came together at Bent's Old Fort NHS to bless and prepare the remains of

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[85] National Park Service, Intermountain Cultural Resources Management Archeology Program, *Archeological Investigations at Sand Creek Massacre National Historic Site October 12–13, 2005,* by Cynthia L. Herhahn and Janet D. Orcutt, 2015, 6.

[86] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[87] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[88] Karl Zimmermann, "Cemetery Burials," in Cannon, *Plan for Repatriation Site Management at Sand Creek Massacre National Historic Site*, 11–13.

[89] National Park Service, "Notice of Inventory Completion for Native American Human Remains from Sand Creek, CO in the Possession of the Colorado Historical Society, Denver, CO," *Federal Register* 63, no. 140 (July 22, 1998), 39292–39293, https://www.govinfo.gov/content/pkg/FR-1998-07-22/pdf/FR-1998-07-22.pdf; National Park Service, "Notice of Inventory Completion: University of Nebraska State Museum, University of Nebraska-Lincoln, Lincoln, NE," *Federal Register* 68 no. 230 (December 1, 2003): 67211–67212. https://www.govinfo.gov/content/pkg/FR-2003-12-01/pdf/FR-2003-12-01.pdf; National Park Service, "Notice of Inventory Completion: Denver Museum of Nature & Science, Denver CO." *Federal Register* 69 no. 58 (March 25, 2004): 15368–15369. https://www.govinfo.gov/content/pkg/FR-2004-03-25/pdf/FR-2004-03-25.pdf.

[90] Chip Colwell, "The Scalp from Sand Creek," *Aeon*, June 8, 2017, https://aeon.co/essays/does-returning-artefacts-help-to-heal-the-scars-of-conquest; Zimmermann, "Cemetery Burials," 11–13.

[91] Janet Frederick, correspondence between Janet Frederick, Sand Creek Massacre National Historic Site and Sheri Muehl Regarding a Food Bill for the Interment Meeting on June 4, 2008, 4, SAND Electronic Records.

the ancestors removed from the massacre site.[92] On October 25, 2010, a seventh ancestor was returned to the Cheyenne and Arapaho Tribes by a descendant of Jonas Anderson, one of the troop members present at the massacre.[93]

In preparation for the interment ceremonies, the NPS removed a downed cottonwood tree from the cottonwood gallery in Section 30, Township 17 South, Range 45 West, an area through which the spring water flows in the sensitive resource area.[94] The tree was milled, and in consultation with tribal representatives, site manager Karl Zimmermann built coffins out of the wood using joinery that did not involve nails or screws. The site then supplied Pendleton baby blankets and a small piece of buckskin, and the tribes provided a small pair of moccasins for each coffin. The coffins and items were stored at the curatorial facility at Bent's Old Fort NHS until the day of the burial.[95]

Tribal representatives selected the burial site in the repatriation area. Each tribe requested two representatives and a spiritual leader to perform the burial ceremonies, and 12 representatives traveled separately to the site. The schedule for the burial spanned 4 days, with tribal representatives needing 2 days on site to conduct necessary activities associated with the burials. At tribal request, markers were purchased and installed following the ceremonies. The area was replaced with native shrubs and grasses, a gravel path marks access routes, a rail fence marks the area, and benches have been replaced for reflection.[96]

For the 2008 ceremony, the digging of the graves was contracted with the cemetery district of Sheridan Lake, and Kiowa County Commissioner Vern Harris used a backhoe to remove the overgrowth and prepare the gravesites with holes to a depth of 5 feet. Brown Funeral Home in Eads provided a tent and chairs for this ceremony as well as a burial ceremony in 2010. Ceremonial activities began at Bent's Old Fort on the morning of June 8, 2008, with the tribes ceremonially preparing the remains for their journey to Sand Creek Massacre NHS. Bent County and Kiowa County sheriffs (Gerry Oyen and Forrest Frazee) led a funeral procession to the site, and approximately 50 people attended the ceremony.[97] Tribal representatives flew a 33-star United States flag and a white flag, which symbolizes the flags flown by Chief Black Kettle during the massacre.[98] There were prayers and song,

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[92] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #144567.

[93] Zimmermann, "Cemetery Burials," 11–13.

[94] Zimmermann, "Cemetery Burials," 11–13; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 89–94.

[95] Zimmermann, "Cemetery Burials," 11–13.

[96] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #144567.

[97] Zimmermann, "Cemetery Burials," 11–13.

[98] Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 8–36; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 48; Zimmermann, "Cemetery Burials," 11–13.

and the funeral concluded with the tribal attendees taking turns with shovels to fill the graves.[99] The site provided a meal for attendees after the ceremony. The next day, site staff marked the graves with yellow plastic ribbon at a depth of 6 inches.[100]

The 2010 ceremony was similar to the 2008 ceremony. A tribal honor guard initiated the ceremony on site, which continued with prayer and songs. Approximately 75 people were in attendance, and the site again provided a meal to attendees at the community building in Eads.[101] Each burial was marked with staked nails in the previously laid grid so burials can be found again if needed.[102]

Conclusion

Tribal representatives and NPS site managers have worked toward understanding and establishing a relationship for the preservation of Sand Creek Massacre NHS, and site staff and tribal representatives have established a close and unique relationship. The site's management and staff have interpreted the enabling legislation with consideration for the tribes' and descendants' needs, including meaningful consultation, formal agreements, financial resources, and mutual support, and listening to the tribal representatives to find mutually beneficial solutions.

Alexa Roberts and Karl Zimmermann attributed much of their success in working with the tribes to, in Roberts words, "Respect. Both ways." Zimmermann neatly described the imperative of building these relationships and establishing trust:

> Well, Sand Creek happened between the United States government and the Cheyennes. And then 150 years later, the federal government comes to the Cheyennes and says, 'we're here, trust us, and we're going to take over your land again, but we're going to do it different, trust us.'

"[I]t took a long time," he added. Alexa Roberts agreed, saying, "We worked with the tribes as partners. I mean, it wasn't just like . . . we'll consult, we'll get their opinion and then, but we're not going to do it that way. Well, we *did* do it that way."[103]

Time also played a critical role in building these relationships. They benefitted from a long stretch of time—8 years—before the park's establishment to, in Roberts's words, "get to know each other and build a level of trust. And it was just so fundamental, it was so important. The community was leery at first, the tribes were certainly leery and they had good reason to be. So we went through some learning curves with each other, both ways,

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[99] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[100] Zimmermann, "Cemetery Burials," 11–13.

[101] Zimmermann, "Cemetery Burials," 11–13.

[102] Cynthia Wiley and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[103] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

among all the partners." Roberts emphasized that an important component of this time period was that stability of NPS employees' work on the project: "We—a lot of us—we were here for throughout the entire establishment process and then for the first however many years of it being a park. We were committed, we were here, and the tribes too." Zimmermann noted how uncommon this is within the NPS: "I think it would have been a whole different relationship and the park would have turned out way different if staff had changed over once or twice like normal parks."[104]

Zimmermann also noted that he and Roberts complemented each other in their roles at the historic site: "We had, like, a similar set of goals and how we looked at the park I think was very similar." He and Roberts "thought pretty much the same and have tried to work diligently with the tribes from the formal tribal representatives to the tribal members as a whole to figure out what they wanted and how we as a National Park Service unit could meet those goals."[105] These shared goals and values enabled them to work together effectively in building a strong relationship with the site's tribal partners.

Current and former site managers interviewed for this administrative history indicated that all levels of site staff were expected to engage in good faith with the tribal representatives. Each site manager emphasized a collective understanding of respect that existed during their tenure, and expressed concern that after their departure, NPS policies, processes, and employee culture may not be sufficient to sustain the relationships that had been so carefully built. They stressed that it was not merely the role of the tribal liaison to create or maintain those relationships, but the responsibility of all of the site's staff members. In their oral history interviews, they each cautioned future site staff in their own way to not forget the importance of the Sand Creek Massacre story.[106]

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[104] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[105] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[106] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

CHAPTER FOUR

Partnerships

Partnerships play an essential role in National Park Service parks and programs. Defined in the agency's fundamentals coursework as "[the] working relationship between the agency and a nonprofit organization or government agency," partnerships help support the agency's mission.[1] They also expand the NPS's capacity when a park's needs exceed its budget and staffing levels. While parks and programs establish their own priorities, they often discover that these align with the priorities of others. These partnerships leverage federal dollars, contribute expertise, and connect parks and communities.

Partnerships also serve as an integral piece of the administrative history of Sand Creek Massacre National Historic Site (NHS) between 2007 and 2017. Governmental and non-governmental organizations, other parks, community, state, and county partners give their time and assistance to ensure Sand Creek Massacre NHS fulfills its mission of educating others about the massacre and its lessons for today. Their dedication to this mission benefits the site in ways both large and small, tangible and abstract. What follows is not an examination of every partnership that the historic site maintained between 2007 and 2017, but a close look at how some of its most important partnerships played out in those years.

Government-to-Government Agreements and Relationship with History Colorado

In Public Law 106-465, the act that authorized creation of Sand Creek Massacre National Historic Site, Congress included two special mandates regarding consultation. First, the site was to "consult with and solicit advice and recommendations from the tribes and the State of Colorado in preparing educational programs for the public about the site (section 5c). Secondly, the site was tasked with "consider[ing] any reasonable needs of a descendant in

[1] NPS Fundamentals Essentials: Partnerships, https://mylearning.nps.gov/library-resources/nps-essentials-partnerships. Accessed September 15, 2021.

park planning and operations, especially with and respect to commemorative activities in designated areas within the site (section 8b)."[2] These mandates are described in greater detail in Chapter Three.

Working these mandates into management of the site has been an ongoing process. In 2008, the National Park Service entered into a Memorandum of Agreement (MOA) with the Colorado State Historic Preservation Office and the Advisory Council on Historic Preservation regarding Section 106 consultation. The site adheres to the required consultation processes outlined in this MOA.

The National Park Service also serves as a non-signatory consulting party to the MOA implementing the government-to-government relationship between the sovereign nations of the Northern Cheyenne Tribe of Montana, the Northern Arapaho Tribe of Wyoming, the Cheyenne and Arapaho Tribes of Oklahoma, and History Colorado (formerly the Colorado Historical Society). The scope of this specific MOA governs consultation between parties regarding History Colorado exhibits, events/commemorations, accessioning, deaccessioning, loans, conservation, and the use of exhibits of artifacts relating to the aforementioned tribes' peoples, educational programs, and all other matters pertaining to the Sand Creek Massacre. It also states that all parties will meet annually, before the Spiritual Healing Run, and other meetings must be requested in writing.

Sand Creek Massacre National Historic Site's participation as a consulting party speaks to site managers' close relationship with the Cheyenne and Arapaho Tribes. The relationship between the Cheyenne and Arapaho and the Colorado state government was not always smooth. In November 2011, tribes learned about the plans for a massacre-related exhibit at the History Colorado Center in Denver. As documented in Chapter Three, tribal representatives had serious concerns that History Colorado had not consulted with them to develop the exhibit. The exhibit closed in August 2013, 15 months after it opened, but the damage had been done. "That was a rough, rough period," Alexa Roberts acknowledged in 2021.[3]

Although it falls outside the time period covered by this administrative history, it should be noted that History Colorado completely turned things around in their relationship with the tribes in the development of their highly acclaimed exhibit "The Sand Creek Massacre: The Betrayal that Changed Cheyenne and Arapaho People Forever," which opened in November 2022.[4] The NPS shared tribal consultations with History Colorado after the first exhibit controversy and closure and participated in the MOA among History

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[2] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023; National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 42–43.

[3] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[4] History Colorado, "Core Exhibition: The Sand Creek Massacre: The Betrayal that Changed Cheyenne and Arapaho People Forever," November 19, 2022, https://www.historycolorado.org/exhibit/sand-creek-massacre-betrayal-changed-cheyenne-and-arapaho-people-forever.

Colorado and the tribes. Once History Colorado received grant funds for this new exhibit, they developed their own relationship with Cheyenne and Arapaho representatives. The resulting exhibit is based entirely on tribal voices. Through these efforts, the relationship between the tribes and the State of Colorado has significantly improved.

Kiowa County Economic Development Foundation

The Kiowa County Economic Development Foundation is a 501(c)(3) nonprofit organization that has worked with Sand Creek Massacre National Historic Site since 2000, before the site was established. The Foundation handles hosting and logistics for park-related meetings that involve the public and stakeholders and is a partner in activities that improve the economic vitality of the gateway community. The NPS's work with the Foundation has been accomplished through cooperative agreements.

Kiowa County Government

Local governments also play a critical role in the operation of Sand Creek Massacre National Historic Site. At the time that the site was being established, Kiowa County donated time and heavy equipment, Sheriff's Office assistance for events, and other services to help with the development and stewardship of the new site. In September 2005, the NPS and Kiowa County signed a cooperative agreement that formalized the relationship between the two parties.[5] The NPS agreed to provide financial assistance to the county, work with the county to coordinate project planning for the park, and be responsible for issues of shared concern (fencing park boundaries on county roads, controlling trespassing on private land in and adjacent to park boundaries, and assist with Gateway Community planning). The county would, in turn, provide equipment and operators to assist the park with things like mowing NPS and Tribal land boundaries for fire breaks, road maintenance, and providing a loader and dump truck for site cleanup, as well as use of the landfill for dumping debris during site cleanup. The county also agreed to assist with traffic control for the Spiritual Healing Runs, assist with special events involving county facilities, and participate in local NPS consultation meetings. The original agreement expired in September 2008. During the time period covered in this administrative history, in 2016, the NPS and

[5] Cooperative Agreement between the United States Department of the Interior National Park Service and Kiowa County, Colorado, September 2005. A copy of this document is stored in the administrative files at Sand Creek Massacre National Historic Site.

Kiowa County signed a new cooperative agreement (P16AC01706); the agreement had a small road and bridge component but was primarily for completing the Murdock Building. The 2016 agreement ran for 5 years, expiring on August 31, 2021.[6]

Throughout the 10 years covering 2007 to 2017, SAND staff worked with Kiowa County on the rehabilitation of the historic Murdock Building in Eads to serve as an off-site visitor and research center. As specified in the agreement, the building is owned by Kiowa County, and the NPS has a lease to occupy a portion of the building. Sand Creek Massacre National Historic Site has also partnered with Kiowa County on other projects related to fulfilling the mission of the site. For example, the road from Chivington to the massacre site was formerly named County Road 54. Following a vote of the Kiowa County Commissioners in 2010, the road was renamed Chief White Antelope Way in honor of one of the Cheyenne peace chiefs killed during the massacre. The county keeps this road maintained.[7]

Sand Creek Massacre National Historic Site does not have law enforcement on staff. Instead, the site relies on a partnership with the Kiowa County Sheriff's Office. A contract between the Kiowa County Sheriff's Office and Sand Creek Massacre National Historic Site authorizes the sheriff's office to provide law enforcement patrolling and emergency responses as needed. The contract is renewed annually.

In their shared oral history interview, Alexa Roberts and Karl Zimmermann spoke about the enormous value of these relationships with the county government. Zimmermann described how quickly the county responded to the park's needs: "All we have to do, like, [there's] a county road that doesn't belong to us, but visitors have to drive out there and we make a phone call to the road and bridge people and say 'a lot of wash-boarding [on the road]', [and] they're out there the next day." Roberts added: "In fact, I remember the first time that we didn't have to ask. When we went out one day and they were grading the road without asking, it's like, 'partnerships, yes!'" Park staff are invited to the county commissioners' meetings, and Roberts said, "For whatever we need they've been—I don't remember anything that they've turned us down."[8]

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6 National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 51.

7 Kiowa County Commissioners Meeting Minutes, September 29, 2010, 684. On file with Kiowa County.

8 Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

United Methodist Church

One of Sand Creek Massacre National Historic Site's most impactful partnerships between 2007 and 2017 was with members of the United Methodist Church. The origins of the partnership stretch back to the massacre itself. John Chivington, the instigator of the massacre, was an ordained Methodist minister. In both their actions and their words, members of the Church have sought to reconcile Chivington's barbarism with his faith.

As far back as the site's dedication in 2007, Methodists have attempted to grapple with the legacy of the massacre. Carol Lakota Eastin, a pastor of the Native American Fellowship-Dayspring United Methodist Church near Peoria, Illinois, attended the site's dedication ceremony. "We envision Indians and non-Indians coming to the site to remember what happened at Sand Creek," she reflected. "We envision scholars and students, pastors and church folk coming to learn the truth of history and to continue raising the important questions lest we repeat the sins of our forebears. It is time for more than words."[9] Three years later, the church realized Reverend Lakota Eastin's hope. In the summer of 2010, the United Methodist Church pledged a founding donation of $50,000 for the Sand Creek Massacre Learning Center. (The donation was authorized in 2008 by the United Methodist Church General Conference.) In September 2010, Intermountain Region Regional Director John Wessels wrote to Reverend Steven Sidorak, the General Secretary of the United Methodist Commission on Christian Unity and Interreligious Concerns, to express his gratitude: "We are delighted that the United Methodist Church has chosen to commemorate the Sand Creek Massacre and support the emerging Sand Creek Massacre Learning Center with this generous donation," he wrote. Following receipt of the donation, the NPS entered into a Memorandum of Understanding that codified a partnership between the agency and the church. The text of the memorandum spelled out what the Church's donation would enable the site to accomplish:

> Together with a matching grant by the National Park Service, this investment will help acquire the research materials that will populate the Center's archives, library and collections, as well as the tools necessary to set up 'virtual' or electronic connections between the Center and other institutions, including Iliff School of Theology, Tribal colleges, and the extensive archives, libraries, and museums that house Sand Creek Massacre research materials. This foundational contribution will enable the Sand Creek Massacre Learning Center to become a reality, and will provide the basis upon which to leverage donations and funding from other contributors.[10]

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[9] Reverend Carol Lakota Eastin, "Massacre Site Offers Historical Truth," *UM News*, May 7, 2007, https://www.umnews.org/en/news/commentary-massacre-site-offers-historical-truth.

[10] Memorandum of Agreement Between the National Park Service and the United Methodist Church, February 16, 2011.

The Memorandum of Agreement between the United Methodist Church and the National Park Service was signed in early 2011 by Wessels; Reverend Sidorak Jr.; and Alden Miller, the then-superintendent of Sand Creek Massacre National Historic Site.

The 2010 donation was not the end of the United Methodist Church's interaction with Sand Creek Massacre National Historic Site. In 2012, at the Church's annual General Conference, Church members adopted an Act of Repentance Toward Healing Relationships with Indigenous People. The Act pushed Methodist conferences and congregations to "implement actions demonstrating a genuine attitude of repentance."[11] The following three primary approaches were developed to show this attitude of repentance:

1. Encouragement and resourcing the education and training of laity and pastors by providing culturally sensitive learning environments.
2. Primacy be given to learning and prioritizing Native American United Methodists in leadership, programming, education, strategizing, and establishment of Native ministry.
3. Wherever the Church holds land and/or property in trust, give due priority and consideration to transferring a portion of the land and/or property back to the tribe(s) that are/were indigenous to the area.[12]

Mountain Sky Area Bishop Elaine Stanovsky took the Act of Repentance to heart. After moving to Colorado in 2009, she had taken it upon herself to learn the history of the Sand Creek Massacre. "Many Native Americans know this history and wonder how Christians would be so ruthless," she told a newspaper reporter in 2014. "Most United Methodists have little if any knowledge of these events and little or no relationship with the descendants of native people who were attacked."[13] What was needed, Bishop Stanovsky believed, was for the United Methodist Rocky Mountain Conference to formally make amends. "None of us Methodists in this room personally participated in the events of 1864 and yet we are who we are, we are where we are, we have what we have, we live where we live, because of that history," she told conference members in an episcopal address on June 19, 2014. "And we participate in patterns of privilege and poverty that are shaped by this

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[11] The United Methodist Church, "Social Principles and Resolutions, Native People and the United Methodist Church, #3321," Native People and The United Methodist Church • GBCS (umcjustice.org). Accessed September 16, 2021, https://www.umcjustice.org/who-we-are/social-principles-and-resolutions/native-people-and-the-united-methodist-church-3321#:~:text=At%20the%202012%20General%20Conference%2C%20The%20United%20Methodist,actions%20demonstrating%20a%20genuine%20attitude%20of%20repentance%20including%3A.

[12] The United Methodist Church, Social Principles and Resolutions, Native People and the United Methodist Church, #3321, Native People and The United Methodist Church • GBCS (umcjustice.org). Accessed September 16, 2021, https://www.umcjustice.org/who-we-are/social-principles-and-resolutions/native-people-and-the-united-methodist-church-3321#:~:text=At%20the%202012%20General%20Conference%2C%20The%20United%20Methodist,actions%20demonstrating%20a%20genuine%20attitude%20of%20repentance%20including%3A.

[13] Colleen O'Connor, "Bishop Explores Role of United Methodist Church in Sand Creek Massacre," *Denver Post*, June 17, 2014, https://www.denverpost.com/2014/06/17/bishop-explores-role-of-united-methodist-church-in-sand-creek-massacre.

history. And so we are called to repentance."[14] The next day, in what Bishop Stanovsky described as "a religious pilgrimage," 13 buses, carrying approximately 650 Rocky Mountain Conference members and guests, arrived at Sand Creek Massacre National Historic Site. Beginning at 10:00 am, the Methodists walked the site, spoke with NPS staff, and continued the process of understanding. They were humbled by what they learned at the site. "I almost didn't come," Reverend Sid Spain said. "There are so many issues facing the church, and I thought maybe this was tangential. I was wrong."[15] Al Addison of the Northern Arapaho was also at the site on June 20th. He was moved that the Methodists came. "I can tell the church has compassion," he remarked.[16]

The Methodists' visit was one of the Park's "first big events" at Sand Creek Massacre National Historic Site, Karl Zimmermann recalled. "Being a small park and not fully completed, as it is today, the roads and the turnarounds and the parking, all those [buses] were—[it] wouldn't be an issue today—but they were then."[17]

Also in 2014, the Church gave a sizable donation to the Cheyenne and Arapaho to help with that year's Spiritual Healing Run. "They gave [the money] to the Cheyenne and Arapaho to fund the kids with their runwear, their shoes, you know, and jackets and stocking caps and gloves," Henry Little Bird Sr. of the Southern Arapaho recalled in 2021. "They basically paved the way for us to Denver because there was a stop in Bennett, Colorado, they had a church there that they fed us [at]. There was another Methodist Church that fed us in Limon, Colorado. So, they were a big part of it."[18] (For more on the Spiritual Healing Run, and the 2014 Spiritual Healing Run specifically, see Chapter Five.) National Park Service staff did not disagree with Henry Little Bird Sr.'s assessment. It had been clear for some time that Sand Creek Massacre National Historic Site would not have been able to accomplish its goals without the help of its partners. That those partners offered help so readily made a difference.

Cooperating Association and Friends Group

Western National Parks Association (WNPA) is a cooperating association with Sand Creek Massacre National Historic Site. This non-profit organization strives to enhance visitors' understanding and appreciation of western national parks by providing educational

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[14] Quoted in Sam Hodges, "Pilgrimage to Sand Creek Brings Healing," *UM News*, June 23, 2014, https://www.umnews.org/en/news/pilgrimage-to-sand-creek-brings-healing.

[15] Quoted in Sam Hodges, "Pilgrimage to Sand Creek Brings Healing," *UM News*, June 23, 2014.

[16] Quoted in Sam Hodges, "Pilgrimage to Sand Creek Brings Healing," *UM News*, June 23, 2014.

[17] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[18] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

material for sale in many visitor centers. WNPA operates bookstores in both Eads at the Sand Creek Massacre Historic Site Visitor and Education Center and in the visitor contact station at the site.

Early correspondence and planning efforts documented the need for a non-profit organization to support the site's resources and values and meet the enabling legislation mandates. In his letter to Reverend Steven Sidorak of the United Methodist Church in September 2010, Intermountain Region Regional Director John Wessels noted, "The National Park Service envisions that the Sand Creek Learning Center will be supported in part by a non-profit foundation or 501(c)(3) corporation, in keeping with standard NPS partnership agreement practices."[19] In addition, the opportunities to "Work with partners to establish a 501(c)(3) nonprofit foundation to assist in the development of a research center" and to "Work with partners to establish a 501(c)(3) nonprofit foundation as a fundraising arm of the park" were important enough to site staff that they called them out with unambiguous clarity when constructing the site's foundation document. In 2016, the United Methodist Church made a separate $75,000 donation that was set aside specifically for the establishment of this research center.[20] The Sand Creek Massacre Foundation, a 501(c)(3) organization, was incorporated in Colorado in 2019 (outside the time period covered in this report). It has a signed Philanthropic Partnership Agreement with the National Park Service and is in the process of helping the National Historic Site develop the Center for Sand Creek Massacre Studies, which is owned by Sand Creek Massacre National Historic Site.[21]

Conclusion

In Sand Creek Massacre National Historic Site's first decade of operation, site managers worked hard to build a strong coalition of partners to support the site. Having a broad range of partners invested in the site's success—including the local government, a cooperating association, a friends group, and a strong relationship with the United Methodist Church—enabled the site's leadership to expand the site's limited capacity and funding. These partnerships, combined with strong tribal relationships built from years of close collaboration with tribal partners, have created a solid foundation upon which Sand Creek Massacre National Historic Site can continue working to further its mission and goals.

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[19] Intermountain Region Regional Director John Wessels to Reverend Steven J. Sidorak Jr., September 17, 2010, Sand Creek Massacre National Historic Site archives.

[20] Bishop Elaine JW Stanovsky, The United Methodist Church, Greater Northwest Area, email message to Alexa Roberts and Kathryn Williams, December 21, 2016, Sand Creek Massacre National Historic Site archives.

[21] See https://www.sandcreekmassacrefoundation.org/about.

CHAPTER FIVE

Anniversaries and Commemoration

Site Dedication: April 2007

National Park Service (NPS) staff and tribal representatives worked tirelessly in the weeks and months leading up to the site's dedication. The NPS established an incident command team to help manage the event, but there were many unknowns. Alexa Roberts recalled, "we didn't have any idea how many members of the public might show up, how many tribal members might show up, . . . [and] we didn't know if there would be disruptions" such as protests or even acts of violence. The Historic Site had been a constant source of debate and disagreement in the local press and on an unofficial Kiowa County website where the public discourse was "very heated," including some "fairly overt threats."[1] Even so, Roberts felt like they had things reasonably under control. Then, a few days before the event, she learned that the Southern Cheyenne tribe "was planning to bring heavy loads of teepee poles delivered to the site and they were going to set up a csamp down in the creek area. . . . It was kind of unexpected and there was going to be a very large contingent of people coming and they were going to set up a camp [and] we weren't expecting that." But "that was okay," she said. More concerning to Roberts was the weather: "the weather was horrible . . . it was rainy and it was cold and it was just nasty—windy." Despite the poor weather, the tribe set up their camp in the creek area and spent the next few days in spiritual preparation and prayer.

The skies over Kiowa County were clear as April 28, 2007, dawned. Coming at the end of a week that had featured multiple storm systems, the change felt fortuitous. "It was like a whole new day," Alexa Roberts recalled in 2021. "It was like this beautiful spring, warm, windless, perfect day. It was like every star aligned."[2] That morning, beginning at 10 am, more than 1,000 people gathered to formally dedicate Sand Creek Massacre National Historic Site. It became the 391st unit of the national park system.

The event's attendees reflected the different parties invested in Sand Creek's future. The Southern Cheyenne and Arapaho Color Guard and Drum Group, the Northern Cheyenne Color Guard and Drum Group, and the Northern Arapaho Color Guard and Drum Group took part in the opening ceremony. Representatives from all three tribes delivered formal remarks. Many of the Cheyenne and Arapaho members in attendance

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[1] Alexa Roberts, phone call with Laura Miller, December 20, 2022.

[2] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

were descendants of the men and women camped at the site on November 29, 1864. The legacy of the massacre, and how it continued to shape their lives, was never far from their minds. "I have been here about four times now and I always feel the same. It's never going to be forgotten," 81-year-old Mary Bear of the Northern Arapaho told a newspaper reporter. "I am getting older and I am glad that I could be here today. This is a great event for all of us."[3] Four of Mrs. Bear's family members were murdered in the massacre.

Figure 11: The Southern Cheyenne and Arapaho Color Guard and Drum Group, the Northern Cheyenne Color Guard and Drum Group, and the Northern Arapaho Color Guard and Drum Group all participated in the dedication of Sand Creek Massacre National Historic Site in April 2007.
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

The National Park Service was also well represented at the event. Then-NPS Director Mary Bomar was present, as were members of the staffs of the parks of the Southeast Colorado Group—then comprised of Bent's Old Fort National Historic Site, Capulin Volcano National Monument, and Sand Creek Massacre National Historic Site. Alexa Roberts, the superintendent of the group, was optimistic about the future of the Sand Creek Massacre site. "I hope that this will be a place that people from throughout the world

[3] Quoted in Anthony A. Mestas, "A Nation Pays Tribute," *The Pueblo Chieftain,* April 29, 2007.

will come to visit and learn about respect," she said on the day of the dedication. "And" she continued, "a place that the Cheyenne and Arapaho people can feel that they can come and always feel at home here. A place where they can reconnect with their ancestors and put some of the pain of the past 143 years to rest."[4]

Members of Colorado's congressional delegation, as well as other Colorado elected officials, also made the trip to Sand Creek for the site's dedication. Former United States Senator from Colorado Ben Nighthorse Campbell, the author of the legislation that established Sand Creek Massacre National Historic Site as a unit of the National Park Service, was one of the event's speakers. In his remarks, he connected the United States of 2007 to that of 1864. "I was delighted to see our Indian veterans come in with the American flag, the first time this flag has flown over this land since 1864," the senator said. "We in Indian country know that we have the largest racial per-capita of enlistments in the United States military services. . . . This is our flag, and this is also our land, too."[5] Colorado Governor Bill Ritter used his remarks to "speak on behalf of the people" of his state who thought it fitting that the site be established. "Some would say it has been too long and it should have happened sooner," the governor acknowledged. "I would add my voice to that."[6] Collectively, the assembled dignitaries acknowledged the massacre as a painful chapter in Colorado's history. The dedication of the site, they hoped, could mark the beginning of a new relationship between the people of the state and the Cheyenne and Arapaho people. "As we dedicate this site today, we are doing what good people do," Congresswoman Marilyn Musgrave told the audience." "We are remembering the wrongs, we are regretting, and we are repenting."[7] Additional acts of repentance came in the years that followed. Some of the most significant coincided with the 150th anniversary of the massacre.

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[4] National Park Service, Sand Creek Massacre National Historic Site Dedication Ceremony, April 28, 2007, Video (US National Park Service) (nps.gov). Accessed August 19, 2021, https://www.nps.gov/media/video/view.htm?id=32588D46-155D-451F-67E08AE8468CDDE9.

[5] Northern Arapaho Tribe, "Sand Creek Site Dedication 2007," *YouTube*, https://www.youtube.com/watch?v=K4_MBttsSAY.

[6] Northern Arapaho Tribe, "Sand Creek Site Dedication 2007," *YouTube*, https://www.youtube.com/watch?v=K4_MBttsSAY.

[7] Quoted in Anthony A. Mestas, "A Nation Pays Tribute," *The Pueblo Chieftain,* April 29, 2007.

Figure 12: Former United States Senator from Colorado Ben Nighthorse Campbell speaking at the dedication of Sand Creek Massacre National Historic Site in 2007. Campbell, who retired from the Senate in 2005, was the sponsor of the legislation (Public Law 105-243) to establish the site as a unit of the National Park Service. *Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.*

Alexa Roberts recalled that none of her fears about the event came to pass:

> there was not a single disruption, there was not a single negativity, there was not a single negative word, there was no protest—there could have been. The sheriff's [office] later on reported . . . after the event was over, not only had there been nothing—nothing went wrong—they said there wasn't even like a scrap of trash anywhere in town. . . . We had like 2,500 people here and nothing. . . . I've always believed that Sand Creek has special guardians and it was like, yep [laughs], because it was perfect.

After years of unease in the local community about commemorating the Sand Creek Massacre with the establishment of a national historic site, Roberts was heartened by the way local residents came together to support the site's dedication:

> The community support, the community, rallying around this effort was just so amazing. Because leading up to it—in the years leading up to establishment—there was a lot of concern about having this event commemorated and having the county sort of being kind of overwhelmed by the presence of this new—this federal presence and the national historic site presence—and how would it reflect on the community. What would outsiders think when they came? What

> would it do to the character of the community? And so forth. When the dedication came it was all hands on deck in the community. I mean, beautifying the town, painting things in the windows to make all the empty buildings look full. They got high school students involved, volunteers—like community volunteers—they all had yellow t-shirts. So during the dedication there were the yellow t-shirts everywhere.

Roberts emphasized that this community support continued well after the dedication, too: "the community support is always right on," she said.[8]

150th Remembrance Event

In 2012, tribal representatives and staff of Sand Creek Massacre National Historic Site began discussing how to honor the 150th anniversary of the Sand Creek Massacre in 2014. Karen Wilde, the site's cultural liaison/interpreter, played a central role in these conversations. Wilde, who had attended the dedication of Sand Creek Massacre National Historic Site in 2007 as a visitor, was hired 4 years later for a term position at the site. It quickly became clear that a temporary position was insufficient for the work required: "after the four years, they decided they needed this position much longer," she recalled.[9] Midway through Wilde's term, Superintendent Alexa Roberts had the position reclassified so that it solely focused on the site's relationship with the Cheyenne and Arapaho Tribes. "That's kind of my job," Wilde said in 2021. "[T]o help [site staff] understand and relay the tribal or Native American point of view."[10]

In June 2012, Wilde had a phone call with Steve Brady of the Northern Cheyenne. "The tribal representatives that we worked with back then were talking about what are we going to do to honor and identify . . . the 150th year [2014], meaning an event, an activity, a ceremony, or all of it," Wilde recalled.[11] While noting that he had not yet spoken with Superintendent Alexa Roberts, Brady told Wilde that he was interested in working with the Smithsonian Institution's National Museum of the American Indian in Washington, DC, to host a 150th commemorative year exhibit in November 2014. Maybe, Brady mused, Senator Ben Nighthorse Campbell could help broker an introduction between NPS staff and museum staff.[12] Once the two sides began talking, however, they realized the challenges of designing and installing an exhibit. As Wilde tells it, "After numerous phone calls and consultations, it was determined, at least from the museum side, that [the site] needed to

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8 Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

9 Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

10 Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

11 Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

12 Karen Wilde (SAND tribal liaison), phone call with Steve Brady, July 10, 2012.

create our own exhibit and have our own curator. They would give us space. None of us have that type of experience, neither did any of the tribal reps, so we kind of thought that was out the door."[13]

Two years later, a new opportunity emerged. The 2014 American Indian Alaska Native Tourism Association conference was held that June in Tulsa, Oklahoma. Kevin Gover, the director of the National Museum of the American Indian, was the conference's keynote speaker. As it happened, Karen Wilde was in the audience for Gover's remarks. "So I patiently waited for everybody to do their greetings and thank him after the keynote, but I meant to be the last one to talk to him and I was," she remembered.[14] Wilde explained to Gover what the 150th commemoration of the massacre meant to both the Cheyenne and Arapaho Tribes and the National Park Service. After hearing her thoughts, Gover offered his support. "Have you and your superintendent call me and we'll arrange something," he told Wilde. Gover's support quickly became tangible. Upon returning to the site, Wilde, together with Alexa Roberts, partnered with a member of Gover's staff to begin planning an event. "The closest date we could get to November 29th was in October," Wilde recalled. "So we took that date [October 9th] because what we were going to do we didn't know at first, we had to put something together real quick."[15]

While Wilde was engaged in conversations with staff of the National Museum of the American Indian, Superintendent Roberts was helping the Colorado state government determine how it would commemorate the massacre. On March 14, 2014, Colorado Governor John Hickenlooper issued executive order B 2014-003. The order established the Sand Creek Massacre Commemoration Commission. The collective members were directed

> to engage in efforts to raise awareness and educate the public of the tragedy at Sand Creek and the events surrounding it. With guidance and assistance from tribal leadership and the Sand Creek Massacre Descendant Committee representatives, the Commission will determine the culturally relevant ways that the Sand Creek Massacre 150-year anniversary can be commemorated to continue the healing process."[16]

Roberts was the only representative from the site appointed to serve on the commission. Many of the Cheyenne and Arapaho representatives that the site worked with, however, were also appointed, including Otto Braided Hair of the Northern Cheyenne, Karen Little Coyote of the Southern Cheyenne, and Henry Little Bird Sr. of the Southern Arapaho. Karen Wilde was not appointed to the commission by Governor Hickenlooper. She did, however, attend several of the group's meetings in Roberts's place.

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[13] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

[14] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

[15] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

[16] Executive Order B 2014 003 of March 14, 2014, *Creating the Sand Creek Massacre Commemoration Commission*, Colorado State Archives.

While park staff were planning how Sand Creek Massacre National Historic Site would mark the 150th remembrance of the massacre, the men and women of the United Methodist Church held their own remembrance. On June 20, 2014, the Church hosted what organizers billed as "a spiritual pilgrimage" at the site. More than 650 men and women, taking part in the 2014 iteration of the United Methodist Rocky Mountain Annual Conference, visited the site to learn more about the massacre. (See Chapter Four for more information on the Methodists' visit and events that led up to it.)

Plans for both the site and the State's commemoration of the massacre developed gradually. The National Park Service would host a 150th commemoration symposium on the massacre at the National Museum of the American Indian in Washington, DC, on October 9, 2014. Karen Wilde would be responsible for inviting the subject-matter experts and tribal representatives for the symposium. On November 29th, the Cheyenne and Arapaho would hold a private ceremony at the site. Park rangers would also deliver several interpretive programs. On the morning of November 30th, the 16th annual Sand Creek Massacre Spiritual Healing Run would begin from the site. At the culmination of the run, on the morning of December 3rd, the state would host a closing ceremony on the west steps of the Colorado State Capitol building in Denver.

In planning the 150th commemoration symposium, Karen Wilde worked with Chantalle Hanschu, an AmeriCorps VISTA member with the Colorado Commission of Indian Affairs. Roberts recalled that Hanschu, who served as the program coordinator for the Sand Creek Massacre Commemoration, "managed to get travel arranged, paid for, logistics with all the—this panel of descendants and excellent subject matter experts—got them all to Washington."[17] Wilde organized three separate panels for the event. The first, entitled "Causes and Consequences of the Sand Creek Massacre," explored historical perspectives on the circumstances that led to the massacre. Panelists included Dr. Gary Roberts, a history professor from Abraham Baldwin College in Tifton, Georgia, and Dr. Henrietta Mann, the founding president of the Cheyenne and Arapaho Tribal College. The second panel examined how the ripples of the massacre extend into the present day and leave multigenerational impacts on tribal traditions, society, identity, and livelihood. Dr. Richard E. Littlebear, the president of Chief Dull Knife College, a university affiliated with the Northern Cheyenne, spoke during this session, as did Gail Ridgley, the Northern Arapaho representative to Sand Creek Massacre National Historic Site, and Karen Little Coyote, the Southern Cheyenne representative to the site. The third and final panel, "Memorialization and Healing," brought panelists together to discuss efforts and accomplishments in remembering the massacre. Senator Ben Nighthorse Campbell took part in this panel discussion. So too did Ari Kelman, the author of *A Misplaced Massacre: Struggling over the Memory of Sand Creek* and author of the site's first administrative

[17] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

history.[18] The symposium concluded with a screening of *The Sand Creek Massacre and the Civil War*, a film that the site commissioned in conjunction with the NPS's service-wide commemoration of the Civil War Sesquicentennial.

In addition to Karen Wilde, three Sand Creek Massacre National Historic Site staff members attended the symposium. Alexa Roberts and Karen Wilde delivered opening and closing remarks, while Jeff Campbell and Craig Moore, two of the site's park rangers and researchers, were speakers on two of the three panels. The entire event, save for the screening of the film, was livestreamed on the National Museum of the American Indian's website.

Karen Wilde was pleased with how the symposium had gone, but she had little time to rest on her laurels. The day after the symposium, she and the other site staff flew back to Colorado. Once back at the site, Wilde resumed work on planning the commemoration events that would take place on November 29th.

In contrast to the site's dedication ceremony, the 150th remembrance event consisted of two separate programs, one for the Cheyenne and Arapaho and one for the general public. "The tribes brought in several of their ceremonial chiefs, their people were invited to come," Wilde said. "The morning of the 29th, they had their own separate private ceremony on the hill where the monument is right now. The rest of the public stayed down in the visitor use area."[19] Cheyenne and Arapaho attendance at the ceremony was robust. "The Cheyenne and Arapaho from Oklahoma, they took like four buses—four busloads of elders, 55 and up, to the Sand Creek," Henry Little Bird Sr. recalled."[20] This emphasis on tribal elders was very much a conscious one. "That was a really big deal for our tribe here to try to get as many of our, mostly elders" to the ceremony, Karen Little Coyote recalled. "Back in 2010, when I first became a representative, they weren't included."[21]

The public 150th remembrance event on November 29th was also a somber affair. Several dignitaries, including Colorado's recently elected United States Senator, Cory Gardner, visited the site that day, but they were not the focus. Site interpretive rangers delivered two interpretive programs. The first program, at 10:00 that morning, explored different aspects of the massacre. The second, starting at noon, examined the life of Cheyenne Peace Chief Black Kettle. "We set up chairs, folding chairs, like classroom style," Karen Wilde said. "We had scheduled visitors all day long."[22] In all, 1,183 people attended the 150th remembrance event at the site. Included among them were the runners who took part in that year's Spiritual Healing Run.

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[18] Ari Kelman, *A Misplaced Massacre: Struggling over the Memory of Sand Creek* (Cambridge, MA: Harvard University Press, 2013).

[19] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

[20] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

[21] Karen Little Coyote, interview with Denver Service Center, Eads, CO, July 21, 2021.

[22] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

Figure 13: Tribal Chiefs speak at the 150th anniversary remembrance event of the Sand Creek Massacre on November 29, 2014.
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

The Sand Creek Massacre Spiritual Healing Run

The origins of the Sand Creek Massacre Spiritual Healing Run date to a year before Sand Creek Massacre National Historic Site was established. In November 1999, Laforce "Lee" Lone Bear, a Northern Cheyenne descendant of massacre survivors, organized a run that extended for 173 miles, from the site of the massacre to the state capitol in Denver. Such an event, Lee Lone Bear believed, would be a "ceremony that would heal the land [and] heal the spirits that were stuck there."[23] It was not the first time that Lone Bear used running to connect the Cheyenne of the present with their ancestors. Three years earlier, he had helped organize a spiritual run to coincide with the commemoration of the Cheyenne breaking out of Fort Robinson, Nebraska, in January 1879.[24]

In the years since the National Park Service began stewarding Sand Creek Massacre National Historic Site, several details related to the Spiritual Healing Run have changed. For one, runners no longer travel the entire route on foot. The changes, however, are small

[23] Quoted in Patricia Calhoun, "The Sand Creek Massacre Healing Run Honors the Past, but is Heading for the Future," *Westword*, December 5, 2013.

[24] As of 2021, the Fort Robinson Outbreak Spiritual Run continues to be held every year.

compared to what has endured. The run is still coordinated by the Northern Cheyenne in partnership with the Northern Arapaho and the Southern Cheyenne and Arapaho. The route of the run continues to connect participants with different aspects of the massacre's legacy. Beginning with a sunrise ceremony and prayer at the site of the massacre, runners travel into the town of Eads. Following a group meal at the end of Day 1, they travel in relays and follow backroads leading to the town of Bennett. From there, they're driven by supporters into Denver. Upon reaching the city limits, the runners disembark from their vehicles and run from Riverside Cemetery, where Silas Soule is interred, and a ceremony is held to honor him. The runners then pass by the intersection of 15th Street and Arapahoe Street, marking the site where Soule was assassinated in 1865. They then work their way up from downtown and end their run at the Colorado State Capitol building. The age of the runners has also been a constant. Many are children and adolescents and adults in their 20s and 30s. "We are not trained runners, but because of the connections with our ancestors, we don't feel pain," Vanessa Braided Hair of the Northern Cheyenne, at the time a 29-year-old, told a reporter in 2012. "It is all about healing and honoring them."[25]

Sand Creek Massacre National Historic Site staff play a modest role in the Spiritual Healing Run. Aside from moral support for the runners, their main contribution comes on the first night. "[We do] a community dinner for [the runners] when they're finished with their ceremonies and running into town," Karen Wilde said.[26] It is a role that the staff excel in. "I got to say, this team here is expert at putting on meals," Alexa Roberts said with a laugh. "For every consultation, for every Spiritual Healing Run, for every big event, they've got serving food down to a science."[27] Through their efforts, site staff help contribute to the run's ongoing success.[28]

The closing ceremony of the 16th Spiritual Healing Run, coinciding with the 150th remembrance event, set the stage for a new chapter in the Sand Creek story. Following a presentation of a memorial plaque honoring the life of Silas Soule at the intersection of 15th Street and Arapahoe Street in Denver, participants walked the last mile to the Colorado State Capitol. A closing presentation, with remarks from several speakers, followed. One of the speakers was Colorado Governor John Hickenlooper. Having established the Sand Creek Massacre Commemoration Commission earlier that year, the governor understood the meaning of the massacre to the Cheyenne and Arapaho people. In his remarks, Hickenlooper sought to honor that meaning. "Today we gather here to

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[25] Quoted in Mike Sandrock, "Sand Creek Massacre Remembered During Spiritual Healing Run," *Boulder Daily Camera*, November 15, 2013, https://www.dailycamera.com/2013/11/15/sand-creek-massacre-remembered-during-spiritual-healing-run.

[26] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

[27] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[28] Forty-five Cheyenne and Arapaho runners took part in the 21st Spiritual Healing Run in November 2019. McKayla Lee, "Spirits Run Deep at Sand Creek," *The Southern Ute Drum*, December 6, 2019, https://www.sudrum.com/top-stories/2019/12/06/spirits-run-deep-at-sand-creek.

formally acknowledge what happened: the massacre at Sand Creek," the governor told the crowd. "And we should not be afraid to criticize and condemn that which is inexcusable. So, I'm here to offer something that has been too long in coming. On behalf of the State of Colorado, I want to apologize." Pausing to shake the hands of seven Cheyenne and Arapaho elders seated behind him, the governor continued. "And I don't make that apology lightly. I talked to all the living former Governors of Colorado that stretches back forty years, and each one of them agrees and in spirit is standing here beside me." As an example, Hickenlooper invoked the words of Dick Lamm, who served three terms as Colorado's governor from 1975 to 1987. "Governor Lamm commented that two of the most powerful words in the English language are 'I'm sorry.' To the runners, to the Tribal Leaders, and to all of the Indigenous people—and the proud and painful legacy you all represent—on behalf of the good and peaceful, the loving people of Colorado, I want to say, I am sorry for the atrocities of our government and its agent that were visited upon your ancestors."[29]

Governor Hickenlooper's apology was met with cheers and applause from those in attendance at the ceremony. Karen Wilde shared their appreciation. "That was just a very significant moment for not only the tribes, but it touched me too to know that this governor understood what happened out there and the lengths he wanted to go to try and make it right," she reflected.[30] As the ceremony concluded, and the 150th remembrance events drew to a close, both National Park Service staff and Cheyenne and Arapaho tribal members were pleased with how the commemoration unfolded. A lot of work had taken place on both sides, and that work had created something deeply meaningful. "It was really special," Henry Little Bird Sr. recalled. "And, again, you know, we had our heavy hearts. Yeah, it was a great time."[31]

Figure 14: The Sand Creek Massacre Spiritual Healing Run, 2016.
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

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[29] Cheyenne and Arapaho Television, "CATV 47 Colorado Governor Sand Creek Apology," *YouTube*, https://www.youtube.com/watch?v=eJ0sffKFSBE.

[30] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18, 2021.

[31] Henry Little Bird Sr., interview with Denver Service Center, Eads, CO, July 21, 2021.

Conclusion

The anniversaries and commemorative events described in this chapter have been enormously important both to tribal descendants and to the staff of Sand Creek Massacre National Historic Site. The NPS seeks to be respectful of the tribes as they honor the massacre as they see fit and support those efforts however they can. The agency's support of these events serves as a reminder that, as Alexa Roberts said, although the NPS has "*physical* guardianship," the "Tribes have *spiritual* guardianship."[32] By organizing or supporting commemorative events like the 150th remembrance events and the annual Spiritual Healing Run, the NPS has signaled that it takes seriously its role as both tribal partner and steward of the massacre site.

[32] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

CHAPTER SIX

Interpretation

This chapter explores the development of interpretive themes and language used at the site in talks, brochures, waysides, and other interpretive media. Loci of interpretation are also discussed as it relates to visitor experience, education, and site development. Special events and programming are briefly mentioned, as are interpretive challenges at the site.

Interpretive Focus over Time

Interpretation at Sand Creek Massacre National Historic Site presents unique challenges because of the sensitivity required in talking about the massacre and its historic context and the need for close consultation with tribal representatives. Site managers rely on the enabling legislation, which calls on them to interpret and preserve the natural and cultural resource values associated with the site; provide for public understanding and appreciation of those values; and memorialize, commemorate, and provide information to visitors to the site to enhance cultural understanding about the site and help minimize the chance of similar incidents in the future.[1] As they have in other aspects of site management, NPS staff worked closely with the Cheyenne and Arapaho Tribes to determine what would be appropriate in both content and technique.[2]

During her oral history interview for this administrative history, Alexa Roberts mentioned that she would have liked to hire Native interpreters to help tell the story at Sand Creek Massacre NHS. There were several challenges in doing so. For one, because of the Sand Creek Massacre, the tribes are no longer in Colorado. They have not been there for a very long time. Kiowa County today is overwhelmingly White (96 percent of residents), and a very small, multigenerational community.[3] Roberts heard from the tribal representatives that it was difficult for Native people to leave their communities, families, and cultural

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[1] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[2] Alexa Roberts, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[3] This and other demographic and socioeconomic data for Kiowa County and surrounding areas can be found at "US Fish and Wildlife Service Socioeconomic Indicators for Kiowa County," *Headwaters Economics*, February 27, 2020, https://headwaterseconomics.org/tools/usfws-indicators.

obligations behind to move to Eads—a town that, Roberts noted, "is really difficult for even non-Indian employees to come in and be a part of the community."[4] Recruitment was also a challenge because, unlike the Bureau of Indian Affairs, the NPS cannot give preference to Native job candidates at Sand Creek. In short, hiring Native interpreters has long been a goal for park management, but achieving that goal has been extremely difficult. Although Roberts was not able to hire Native interpreters while she was superintendent, she did consider how the site would navigate the cultural history and trauma of the Sand Creek massacre with Native interpreters involved in the National Park Service's interpretive model. The NPS interpretive model presents "facts" and leaves conclusions about the events to be drawn by the listener. Roberts noted that Native interpreters might tell the story in a different way than the NPS would, and the NPS and future site managers would have to consider how to "put these different approaches together" for visitors.[5]

Interpretive Themes and Programming

The interpretive themes for Sand Creek Massacre NHS evolved in the decade between 2007 and 2017 through a series of staff planning efforts and consultations with tribal representatives. The following discussion summarizes this development over time in terms of themes, programming, and media, all of which are intertwined. There are many interpretive themes for the site due to the complexity of its history, tribal involvements, enabling legislation, and discussions about what is appropriate.[6] Interpretive themes are based on the site's purpose, significance, and primary resources. Primary interpretive themes are the key stories, concepts, and ideas of a national park system unit. They are the groundwork that NPS staff use to educate visitors about the site's resources. With these themes, visitors can form intellectual and emotional connections with the site's resources and experiences.[7]

Interim Site Management Plan Interpretive Themes **(2006).** The interim site management plan provided basic guidance for the early interpretation of the site, drawing from the site's Special Resource Study (2000), until a more in-depth discussion could be had. The interim site management plan identified the following four primary stories for the early interpretation of the site:

1. Significance of the Sand Creek Massacre event and site
2. Remembrance of the victims of the Sand Creek Massacre

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[4] Alexa Roberts, phone call with Laura Miller, December 20, 2022.

[5] Alexa Roberts, phone call with Laura Miller, December 20, 2022.

[6] Alexa Roberts, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[7] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 17–18.

3. Present-day living culture of the tribes associated with the Sand Creek Massacre
4. Historical and cultural context of the Sand Creek Massacre

These themes helped set the foundation from which other themes and interpretive media were developed. When the interim site management plan was implemented, interpretive themes would be analyzed and developed during the general management planning process.[8]

Historic Interpreter's Packet **(2008).** In 2008, Jeff Campbell, then a volunteer at Sand Creek Massacre NHS, compiled a document entitled *What We Know*, which was distributed to interpretive staff at Sand Creek Massacre NHS and Bent's Old Fort NHS. This document provided descriptions of the area, the historic context of massacre, and the events of the massacre by compiling multiple sources of information and different perspectives of the events of the massacre. The document additionally contained a detailed bibliography.[9]

Interpretation and Education Operations Review **(June 2014).** After a lengthy interim site management plan implementation period and near the end of the general management planning process—and prior to the 150th commemoration—Alexa Roberts requested a review and assessment of interpretation and education at the site. In June 2014, an Interpretation and Education Division Policy Audit and Program Assessment was conducted by Intermountain Regional Chief of Interpretation and Education Susanne McDonald and Deputy Regional Director Colin Campbell. Site managers wanted to know how well their interpretive efforts aligned with regional and systemwide NPS efforts. The timing of this review corresponded to the beginning of the site's interpretation planning, which was omitted from the general management planning process.[10] McDonald and Campbell's report was part of this review. Their report acknowledged the high quality of the historic site's interpretation on the waysides and programs but noted the lack of a museum exhibit and site film, which were major policy components. It also acknowledged the challenge of developing interpretive media on site due to the site's sacred nature.[11]

The report noted that the site had been installing new wayside exhibits, rewriting older brochures, and producing new ones. The new exhibits and publications were described as well-designed and meeting most of the Interpretive Development Program (IDP) standards. While the report acknowledged the accuracy of the information on the interpretive waysides and the site's work with tribal representatives, the report recommended that the site incorporate national initiatives into their interpretive

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[8] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 44.

[9] Jeff C. Campbell, *Sand Creek Massacre National Historic Site: Historic Interpreter's Packet*, National Park Service, 2008, 2–22, SAND Electronic Records.

[10] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 17–18; National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 15, SAND Electronic Records.

[11] National Park Service*, Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 1–2.

programing such as documenting climate change through changing water patterns at the site and using soundscapes to help visitors understand how encroaching industries may impact the site.[12]

The audit additionally observed that the site had no youth programming and recommended that managers work with national or local youth groups to identify projects where young people could participate. The report noted that there was no formal Scouts program at the site, nor was there a formal Junior Ranger Program, though the site had a Junior Ranger badge.[13] During the site visit for this administrative history, site managers explained that they recently received approval for a Junior Ranger program; however, they emphasized that some programming common among NPS units is not appropriate for Sand Creek Massacre NHS.[14]

Branching to educational programing, the report noted that the site did not have a primary interpretive theme, and therefore, there is no specially developed curriculum for educational programming. Interpretive talks did not have learning objectives and were not based on national standards, though interpretation was tailored to meet individual teachers' needs.[15]

***General Management Plan* (2015).** The no-action alternative of the *General Management Plan* notes that there is no place to access comprehensive interpretation of the Sand Creek massacre, and the limited interpretive programs and media did not allow for a full understanding of the site, leaving visitors wanting to know more. Visitors expect to receive a comprehensive and balanced interpretation of the site; however, the limited interpretation and programs resulted in visitors spending only a short time on site. The preferred alternative mentions that trails and low-profile interpretive media—such as a self-guided tour with literature or small exhibits, and/or ranger guided tours—were being considered. Preserving and interpreting sensitive resources, which are closed to the public, is beneficial for future visitors and heritage stewards. An archeological survey would add to the comprehensive interpretation of the site.[16]

The *General Management Plan* notes that, due to the extreme sensitivity of the historical events at the site and the need to interpret tribal oral history and the voices of the descendants respectfully, interpretive themes were scheduled to be developed in a separate

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[12] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 1–2, 16.

[13] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 16–18.

[14] Alexa Roberts, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[15] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 15, 19.

[16] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 166.

consultation process. A workshop to develop these themes took place in the fall of 2015,[17] and a set of significance statements were created. These significance statements greatly informed the development of the initial set of interpretive themes that were part of the long-range interpretive planning process.[18]

Interpretive Theme Development: Foundation Document **(2016–2017).** During the site's foundation document planning process, a foundation workshop was held in Denver in January 2016. Participants, who included tribal representatives, History Colorado personnel, and other subject-matter experts, developed 12 primary interpretive themes and a variety of subthemes.[19] The large number of themes was due in part to tribal concerns regarding what was appropriate.[20] The interpretive themes were intended to be pointed and specific.[21] The first six themes were created and revised by the entire group, and the rest of the themes were developed by a core group of NPS staff and the workshop facilitator. The themes and subthemes were refined in a recommendations workshop held at the site in May 2016 and further refinement required about a year of consultation meetings.[22] Prior to developing these interpretive themes, interpretive programming had been guided by the interim site management plan.[23]

During a consultation meeting in Denver in October 2017, the primary interpretive themes and subthemes were approved by tribal representatives.[24] These interpretive themes were included in the Sand Creek Massacre National Historic Site *Foundation Document*, which was approved in December 2017. Because this approval came at the end of the decade covered by this administrative history, these interpretive themes are included below. A long-range interpretive plan was subsequently completed in 2020, with additional

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[17] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 17–18.

[18] National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 6–12.

[19] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 9–10; National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 9–12.

[20] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[21] Janet Frederick, Karen Wilde, and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[22] Alexa Roberts, Karen Wilde, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 1–8, SAND Electronic Records; National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 9.

[23] National Park Service, *State of the Park Report,* 2017, vi.

[24] National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 9; Sand Creek Massacre National Historic Site, Sand Creek Massacre NHS Interpretive Themes and Subthemes: As found in the Sand Creek Massacre NHS Long Range Interpretive Plan, December 2018, 2018, 1, SAND Electronic Records.

refinements to these themes and subthemes. Although it is outside the period of this administrative history, the 2020 interpretive themes are included in Appendix A for comparison.[25]

> The following interpretive themes have been identified for Sand Creek Massacre National Historic Site. (Note that the order of the themes does not reflect the level of significance.)
>
> 1. To the Cheyenne and Arapaho people, particularly those who are descended from victims and survivors, the site of the Sand Creek Massacre has profound sacred and spiritual significance.
> 2. The inhuman brutality against the Cheyenne and Arapaho elicited territorial outrage, which spread nationally and destroyed the trust of many Native people in the U.S. government and those American ideals it was supposed to represent.
>   a. Even amidst the carnage of the Civil War, military and congressional investigations were launched resulting in official condemnation of the massacre.
> 3. The murderous betrayal of the Cheyenne and Arapaho at Sand Creek profoundly disrupted the traditional, spiritual, social, political, economic and geographic structures of the tribes, with far-reaching impacts that are still painful today.
>   a. The loss of 13 chiefs of the Cheyenne Council of 44, killed at Sand Creek, greatly impacted the political structure and institutional knowledge of the tribe.
> 4. The Sand Creek Massacre teaches a universal lesson that rejection of conscience based on fear, hysteria and stereotyping can lead to a catastrophic dehumanization of people of different cultures, beliefs and ethnicities.
>   a. Through education and understanding of the value of diversity, all Americans can assist in minimizing the chances of similar incidents in the future.
> 5. The Sand Creek Massacre represents the attempted extermination of American Indian tribes as they struggle to maintain their lands, cultures, values and identities in the face of centuries of expansionist repression and subjugation.
> 6. The Sand Creek Massacre reveals good and evil qualities, such as courage, anger, depravity, grief, indifference, perseverance, fear, hate, greed, forgiveness and the quest for healing through its heroes, victims, perpetrators, survivors and descendants.
> 7. The Cheyenne and Arapaho people at Sand Creek, representing a long developed, mature, complex and successful civilization trying to follow the rules of tribal and U.S. law at a designated place of safety, were savagely attacked in an uncivilized manner by the United States Army.

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[25] National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 9–12.

8. The Sand Creek Massacre led to an escalation in conflict between Plains Indians and the dominant American society, which carried forward for decades punctuated by episodes of intense military activity.
9. The intense competition for resources from large waves of European American immigrants settling the plains in a short span of time is one of the underlying causes of the Sand Creek Massacre.
    a. The discovery of gold and the coming of the railroads led to an onslaught of migration to the region.
    b. The competition between immigrants and Native peoples led to attempts to eradicate both the Native tribes and the resources on which they depended within the path of this migration.
10. Many of today's descendants owe their lives to the courage of the women at Sand Creek.
    a. When Chivington ordered his troops to attack the Cheyenne and Arapaho encampment, he knowingly attacked a peace camp that was inhabited by the elderly, children, and women of various ages.
    b. Women were not just passive victims of the attack; many girls and/or young women escaped, finding refuge wherever they could.
    c. Some women helped other family members escape, and a few even chose to fight.
11. Due to the decision of officers, such as Captain Silas Soule and Lieutenant Joseph Cramer, to disregard their orders, many Cheyenne and Arapaho descendants, as well as Sand Creek Massacre National Historic Site, exist today.
12. The history of laws and treaties both before and after the massacre show a pattern by the U.S. government of both broken obligations and some later attempts to acknowledge culpability up to and including the passage of the legislation creating the Sand Creek Massacre National Historic Site.
    a. The drive by the U.S. government to construct a transcontinental railroad in the 1800's led to extinguishment of treaties and displacement of native peoples throughout the Great Plains and beyond.
    b. In 1865, the U.S. government officially accepted culpability for the massacre and further agreed to indemnify massacre survivors through Article 6 of the Treaty of the Little Arkansas.
    c. The tragedy of the Sand Creek Massacre shocked a nation, leading Congress to enact legislation creating the Sand Creek Massacre National Historic Site in 2000.

Interpretive Media

Before the site opened to the general public in April 2007, there were no visitor contact facilities or interpretive/hiking trails, signs, kiosks, or exhibits. Interpretation consisted of brochures, such as the official map and guide developed by the Harpers Ferry Center. During a 2021 site visit, the study team reviewed the 2014 and 2017 brochures, which were still accessible from the brochure boxes on site, even though the official brochure has been updated. The 2017 brochure included a map showing the US Cavalry approach from Section 36.[26] Both the 2014 and 2017 brochures discussed the important facts of the massacre, but the 2017 brochure shows more sensitivity to the Cheyenne and Arapaho worldview.[27] Other interpretive media included handouts for visitors who had to arrange ahead of time to access the site. Staff provided guided tours on an as-needed basis.[28]

To communicate the four primary interpretive themes identified in the interim site management plan, site managers began to consider the installation of interpretive signs, kiosks, and/or exhibits so visitors could orient themselves to the site and understand its natural and cultural significance, including its sacred qualities. They recognized that installing these signs/kiosks/exhibits was particularly important because of the site's limited staff size and the distance between the administrative offices in Eads and the site itself. The interim site management plan prioritized interpretive media that could be available to visitors prior to their visit or media that visitors could access on their own. Examples suggested in plan include a regularly updated site website, brochures, and interpretive signs/kiosk/exhibits, though the details were still to be determined. Site managers also considered a pullout and overlook with an interpretive kiosk or wayside exhibit on Section 36, though the land was still owned by the State of Colorado.[29]

As the 2007 dedication approached, site managers held a design competition with architectural design students from nearby colleges for interpretive signs to be placed at the site. The winning design incorporated lodgepoles on the signs and additionally influenced design of the entrance sign at the site. At the time of the site dedication, there were four interpretive exhibits on site. These exhibits included copies of the original letters written in December 1864 by Lt. Joseph A. Cramer and Cpt. Silas Soule, who recounted the horrors of the massacre and the mutilation of the victims. The letter exhibits are located in the visitor

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[26] Sand Creek Massacre National Historic Site, Unigrid, "Attack at Dawn," 2017. Hard copy on file at the Denver Service Center.

[27] Sand Creek Massacre National Historic Site, Unigrid, "Attack at Dawn," 2017. Hard copy on file at the Denver Service Center.

[28] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 41.

[29] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 41–56.

use area and they are important primary sources to the story of the Sand Creek Massacre. Tribal representatives have agreed that the letters are important to understanding the events of the massacre.[30]

Tribal representatives and NPS staff continued to develop interpretive waysides at the site and by 2009, interpretive panels were installed at the site. These interpretive panels won second place overall in the National Association for Interpretation media category. NPS staff also nominated representatives from the Cheyenne and Arapaho Tribes for their efforts in developing the wayside exhibits. Craig More, an interpretive ranger at the site, was recognized for his efforts in writing the text and acquiring graphics. David Restivo of Glacier National Park, the 2007 Freeman Tilden Award winner, was recognized for his design and formatting of the wayside panels.[31]

The 150th remembrance of the massacre was held in 2014. Around this same time the National Park Service was recognizing the Civil War's sesquicentennial, with ongoing conversations on how the Civil War is interpreted. The Civil War Sites Advisory Commission had included the Sand Creek massacre as a Civil War site; however, people wanted to know why, as it was the only Civil War site in Colorado. Because both the 150th commemoration of the Sand Creek Massacre and the Civil War sesquicentennial were occurring concurrently, site managers applied for funds to tell the story of the Sand Creek Massacre within the larger context of the Civil War. Site managers envisioned the project as a film that used George Bent's life story as the thread connecting the tribes' relationships with White people, beginning at Bent's Old Fort and leading to the Sand Creek massacre. George Bent was half-Cheyenne, half-White, and over a span of about 30 years he saw the entire trajectory of tribal/White relations change from an economic and kinship-based interrelationship to the ultimate betrayal by White people in the Sand Creek Massacre. His perspective as a participant in and witness to those changes was the thread used to tell the story of the Sand Creek Massacre and the Civil War. The tribes were consulted about this project and their reaction was, as Roberts characterized it, "lukewarm." "[T]hey were great participants in it," she said, "but they're like, it's your story, it's a good story, but it's not our story. It's a story about George Bent, and that's okay, but it's not our story." "[T]here clearly needs to be more films," she added. But Roberts emphasized that it was an important film for the Civil War sesquicentennial, drawing attention to why Sand Creek Massacre National Historic Site is recognized as the only Civil War battlefield site in Colorado.[32]

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[30] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[31] "'The Sand Creek Massacre and the Civil War' Film Coming to Eads," *Kiowa County Press*, November 10, 2017.

[32] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Figure 15: Interpretive panels in the visitor use area featuring copies of the December 1864 letters written by Lt. Joseph A. Cramer and Cpt. Silas Soule.
Photo by Tom Gibney, May 2021.

The 45-minute film was developed by Paul Feldman of Postmodern Productions and debuted in Washington, DC, at the National Museum of the American Indian (NMAI) for the 150th commemoration symposium, which tribal representatives attended (see Chapter Five on anniversaries and commemorations).[33] The film is kept in both site archives and in archives at the NMAI.[34] It did not gain the long-term interest of PBS; the film was pitched as an episode for the *American Experience* series, and was declined. The film's producers sent pitch reels to several media outlets for broader public exposure, but none accepted. As a result, the film received very little public attention. While site staff believed the film did a good job of telling the story it set out to tell, the film was not appropriate as the site's main interpretive film. In addition to not telling the tribes' story, the film

[33] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review,* 2014, 1; Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021; "The Sand Creek Massacre and the Civil War' Film Coming to Eads," *Kiowa County Press*, November 10, 2017, https://kiowacountypress.net/content/%E2%80%9C-sand-creek-massacre-and-civil-war%E2%80%9D-film-coming-ead.

[34] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021. The film was also shown at History Colorado, and was used as part of an exhibit at Bent's Old Fort, and is available (as of June 2024) on the Sand Creek Massacre Foundation's YouTube channel: https://www.youtube.com/watch?v=QLtI_nK_b1o&ab_channel=SandCreekMassacreFoundation.

was too long for an NPS interpretive film.[35] The film never became the site's main interpretive film and the site still needs a film as of the time of this writing.[36] The film received the 2015 National Association for Interpretation Award and the National Association of Government Communicators Gold Screen Award.[37]

A 2014 Interpretation and Education Division Policy Audit and Program Assessment analyzed the interpretive media and educational programing at the site. While the letters are important to understanding the site, the report recommended an accompanying summary panel to explain their significance.[38] The Cramer and Soule letters were largely left undescribed in the assessment, although site managers told the administrative study team that the letter exhibits do not conform to NPS best practices for interpretive media because they are text-heavy with no pictures. The letters also do not meet accessibility standards since the cursive of the text may be difficult for some visitors to read, and the black ink on a yellow background may present barriers for some visitors. If these interpretive waysides of the letters were to be taken down in the future, however, site staff have indicated they would find another way to display the letters, or their content, due to their high importance and value.[39]

The interpretation and education assessment concluded that the waysides and programs were of the highest standards, but suggested areas for improvement including the height of interpretive waysides, a lack of a large-print brochure, and the absence of audio descriptions for visitors with limited mobility and limited vision. The report also noted that the site had no social media or digital media, and the site's NPS webpage lacked information and features were being used improperly.[40]

In 2017, after the 2015 acquisition of Section 36 by the National Park Service, an interpretive pull-off and wayside were installed along Chief White Antelope Way overlooking the landscape.[41] The three-panel interpretive wayside presents the events leading up to the massacre and includes topics such as the meeting at Camp Weld between Cheyenne and Arapaho peace chiefs with Territorial Governor John Evans, the movement of

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[35] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[36] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 19.

[37] "The Sand Creek Massacre and the Civil War' Film Coming to Eads," *Kiowa County Press*, November 10, 2017.

[38] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 33.

[39] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[40] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 18.

[41] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Cheyenne and Arapaho to Fort Lyon, and events that led to their encampment in the area of Sand Creek. The wayside also describes the night movement of Chivington's forces to Sand Creek from Fort Lyon.[42]

The information contained on the wayside reflects site staff's new understanding of the massacre. Research conducted by park staff in collaboration with subject-matter experts and tribal representatives between 2007 and 2017 uncovered evidence that changed the management of cultural resources and interpretation at the site,[43] including the knowledge of how the troops moved toward the site of the massacre. The troops are no longer thought to have approached over the Monument Hill area, as was hypothesized in the site location study (2000), but rather from Section 36.[44] The NPS had been communicating with the State of Colorado about Section 36 since about 2002; the ongoing research about the significance of this section is what led to it being included within the National Register of Historic Places boundary. The fact that the NPS was ultimately able to acquire it was the culmination of years of effort by both the NPS and the State.[45]

Comprehensive long-range interpretive planning began in 2016 and concluded in 2020. Site staff have continued to create new interpretive media and make improvements to current media.[46] Site managers and interpretive staff continue to produce news releases, biographies of important individuals associated with the Sand Creek massacre, and informational brochures. Site managers have also considered how to connect the story of the Sand Creek Massacre with other national park units and how to reach new audiences. During the study team's site visit in 2021, former and current site managers mentioned that the accessibility of new media and improvement of older media were a particular concern.[47]

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[42] Photo taken of the wayside by the study team during the site visit on in May 2021; National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 33, 52.

[43] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 14, 29, 37 specifically mentioned data and GIS needs for Section 36; National Park Service, *State of the Park Report,* 2017, 33; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7-4. The maps on 7-17 and 7-19, 7-21, 8-36 represent what was considering to be the approach of Chivington's troops at Sand Creek. This understanding was subsequently modified with new evidence.

[44] Sand Creek Massacre National Historic Site, Unigrid, "Attack at Dawn," 2017. Hard copy on file at the Denver Service Center.

[45] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Planning, Environment & Public Comment (PEPC) Project Search #68348. Accessed August 12, 2021; Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 1–2; National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 56; Sand Creek Massacre National Historic Site, *Sand Creek Massacre NHS Interpretive Themes and Subthemes: As found in the Sand Creek Massacre NHS Long Range Interpretive Plan, December 2018*, 2018, 2.

[46] National Park Service, *State of the Park Report*, 2017, 33; National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 7.

[47] Janet Frederick, Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 13, 26.

As the long-range interpretive planning process was underway, site staff also began to prepare for an interpretive wayside exhibit plan. Notes for the interpretive planning process mention the latest long range interpretive planning efforts in May 2016, but the date of the notes themselves is unknown. The notes document discussions of interpretive themes and media at the primary loci of interpretation such as the Section 36 pullout, the lower parking lot and visitor contact/administrative area, the upper parking lot, Monument Hill, the repatriation area, and the two interpretive trails—the trail from the visitor use area to Monument Hill and Bluff Trail.[48]

In 2017, the exhibit plan was underway, and a fabrication company was identified to make the actual exhibits. The finished project aimed to blend the interpretive trails with the landscape.[49] During the site visit in 2021, the study team saw these new exhibits along the interpretive trails, which more closely conformed to wayside exhibits in other NPS units. Thus, the types of interpretive waysides/kiosks/exhibits at Sand Creek Massacre NHS are blended by media type, age, and accessibility.

Loci of Interpretation

With implementation of the interim site management plan, two primary areas were identified for visitor access and interpretation: the former Dawson Ranch area and the overlook with the stone and concrete monument.[50] These areas have been discussed elsewhere in this document and are referred to as the visitor use/administrative area and Monument Hill. These two areas were developed and formalized for resource protection and visitor access because, prior to the site's opening, visitors parked haphazardly on the sides of roads and on other disturbed areas.[51] During the period of 2007–2017, more areas of the site began to be developed for visitor interpretation. These locations are briefly described below, starting with the first interpretive signs that a visitor would experience at the site and ending with a brief description of the visitor and education center in Eads (the Murdock Building), which was not yet open to the public during the period covered by this administrative history.

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[48] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 1–8.

[49] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 13–14, SAND Electronic Records.

[50] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 44–46.

[51] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 47.

Section 36 Pullout

The Section 36 pullout, installed in 2017,[52] features one wall with three interpretive signs. These signs thematically address the Cheyenne and Arapaho journey to Sand Creek; the soldiers' journey from Fort Lyon to Sand Creek; and pre-attack information such as the time of day, Chivington's speech, and the soldiers' preparation before the attack.[53] Interpretive themes expressed at this location include the attempted extermination of American Indian tribes and their struggle to maintain their lands, cultures, values, and identities amidst expansionist repression and subjugation, and how the massacre led to an escalation in conflict.[54]

Figure 16: Interpretive panels at the Section 36 pullout.
The pullout was completed in 2017, and the panels were installed in 2019.
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

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[52] Planning, Environment & Public Comment (PEPC) Project Search #68348, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 12, 2021.

[53] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 1–2; photo taken of the wayside by the study team during the site visit in May 2021.

[54] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 1–2; Sand Creek Massacre National Historic Site, *Sand Creek Massacre NHS Interpretive Themes and Subthemes: As found in the Sand Creek Massacre NHS Long Range Interpretive Plan, December 2018*, 2018, 2.

Visitor Use/Administrative Area

The visitor use and administrative area was the first area developed for visitor interpretation and presents a concise history of the Sand Creek Massacre. The Conscience and Courage exhibit and the Soule and Cramer letters were identified to be retained in undated meeting notes concerning the development of a comprehensive interpretive wayside plan.[55] Seemingly prior to these notes, the 2014 NPS audit of the interpretive media at the site described these letters as "a little long" and a summary panel was suggested to accompany them.[56]

Additional suggestions for interpretive media to be presented here included a map of the site showing historic locations, such as the village, and routes of attack and escape. Another suggestion included setting up a tipi seasonally on the interpretive trail from the visitor use area to Monument Hill to encourage trail use.[57]

Interpretive waysides and programming in this area explore seven of the interpretive themes discussed above. These include the sacred and spiritual significance of the landscape; the Cheyenne and Arapaho people and the betrayal and profound disruption of the tribes' traditional spiritual, social, political, economic, and geographic structures with impacts that are still painful today. Other themes include a universal lesson about conscience, stereotyping, and valuing diversity to minimize similar incidents in the future; good and evil qualities (e.g., courage, anger, fear, and forgiveness) and the quest for healing; the escalation of conflict between Plains Indians and the dominant American society; the decision of officers to disregard their orders resulting in many Cheyenne and Arapaho descendants living today; and the history of laws and treaties before and after the massacre showing a pattern of broken obligations by the US government and later attempts to acknowledge culpability.[58]

Trail from the Visitor Use Area to Monument Hill

The interpretive waysides along the trail between the visitor use area and Monument Hill focuses on Cheyenne life, the use of Big Sandy Creek as a seasonal camp, and Cheyenne uses of local flora and fauna, and provide a description of a peace chief's camp. A stone

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[55] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 2.

[56] National Park Service, *Sand Creek Massacre National Historic Site Interpretation and Education Operations Review*, 2014, 33.

[57] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 2.

[58] Sand Creek Massacre National Historic Site, "Sand Creek Massacre NHS Interpretive Themes and Subthemes: As found in the Sand Creek Massacre NHS Long Range Interpretive Plan, December 2018,"1–3.

wall with two or three interpretive signs was planned along this trail, and by 2021, these plans had been realized, as observed by the study team. This area also includes a bench and small signs reminding visitors to be respectful while visiting the site.[59]

Monument Hill

Site staff planned for the interpretive media at Monument Hill to provide an overview of the Sand Creek Massacre as well as information on the village, peace chief's camp, pony herd locations, and flags that were raised in the village (a white flag of truce and an American flag of that period). Interpretive media also included information on the sacredness of the landscape and a note that the landscape was treeless in 1864. Another stone wall, with places for two or three interpretive signs as well as an interpretive message about the inaccurate text displayed on the historic marker, was also planned for this area. Themes and topics explored at Monument Hill included the sacredness of the landscape and how the Cheyenne and Arapaho people at Sand Creek, who were following the rules of tribal and US law at a designated place of safety, were brutally attacked.[60] From these plans, the study team noticed that the flag interpretive displays had been installed in the visitor use area near the maintenance building instead of at Monument Hill. Content in the Cheyenne and Arapaho languages is included in some of the interpretive waysides.[61]

The 1950 historic marker, which shows an image of a male American Indian in a headdress with the inscription "Sand Creek Battle Ground Nov. 29 & 30, 1864" illustrates the historical mischaracterization of the massacre by local civic groups and the State of Colorado.[62] Visitors, new tribal representatives, and new site staff regularly ask about the marker, and tribal representatives such as Otto Braided Hair expressed their desire to have the marker moved. The site considered installing interpretive text near the marker to explain its continued presence and the mischaracterization of the massacre. Site managers also kept open the possibility of moving the marker in the future. This marker is also discussed in Chapter Three.[63]

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[59] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 2; photo of the bench and signs taken by the study team during the site visit on in May 2021.

[60] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 3.

[61] Photo taken of the flag and interpretive wayside in the visitor use area by the study team during the site visit in May 2021; photo taken of an interpretive wayside with Cheyenne and Arapaho language near the repatriation area by the study team during the site visit in May 2021.

[62] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, Figure 6, 11; 17, 57.

[63] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Repatriation Area

The repatriation area is described in Chapters Two and Three of this administrative history. As part of the initial exhibit plan, signs were planned to identify and interpret the repatriation area to visitors.[64] An interpretive wayside—consisting of a stone wall, sign, and bench—was installed as part of post-2017 improvements to the Monument Hill area.

Bluff Trail

The bluff interpretive trail exhibits were planned so the interpretive wayside would explore the events as they unfolded on November 29, 1864. A stone wall with places for two interpretive signs was planned, as was content that told the story of a Cheyenne woman who mistook the sound of approaching soldiers for approaching buffalo. The trail additionally included safety information for visitors and an estimated amount of time required to walk the round-trip trail.

Three bench sites were planned as well as three stone walls with places for interpretive signs near the benches. The signs were thematic and were expected to discuss the following subjects:

- The division of Chivington's troops
- The Cheyenne youth who spotted the advancing troops
- The chiefs who walked to parley with the troops
- The first-person accounts of the massacre
- Women's contributions in assisting others to escape
- The outlying fights and archeology of those areas
- Silas Soule and Joseph A. Cramer disobeying orders by ordering the men in their companies to stand down
- Soule and Cramer's companies disobeying orders to participate in the massacre

A display at the terminus of the Bluff trail was planned to interpret the sand pits, massacre atrocities, and survivors; the Congressional investigations and the Treaty of the Little Arkansas; and the Cheyenne and Arapaho people today, including quotations from descendants to never forget what happened at Sand Creek. One large U-shaped wall, with space for three interpretive signs, was suggested for the terminus. Along the Bluff trail, interpretive themes were planned such as

- the courage of women;
- the attempted extermination of American Indian tribes;
- good and evil, and the quest for healing;

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[64] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 3.

- the actions of Soule and Cramer ensuring that Cheyenne and Arapaho descendants exist today;
- the inhumane brutality against the Cheyenne and Arapaho people;
- the lack of trust many American Indians have in the US government and the ideals it is supposed to represent;
- the escalation in conflict between Plains Indians and the dominant American society; and
- the history of laws and treaties that show a pattern of broken obligations by the US government and some later attempts to acknowledge culpability, and the universal lesson that the rejection of conscience based on fear, hysteria, and stereotyping can lead to a catastrophic dehumanization of people.[65]

The planned interpretive signs and benches were installed before the 2021 site visit for this administrative history.

Special Issues and Concerns for Interpretation

In addition to the extreme sensitivity required to interpret the massacre, there are other special issues and concerns surrounding interpretation at the site. Some of these issues have been resolved over the years through careful site planning and development by site managers and tribal representatives, and other issues and concerns are present and likely to continue into the future.

The broad issue of authority in telling the story of the Sand Creek massacre had long been a challenge for tribal representatives and site managers. Many of the specific issues and concerns related to authority arose as part of the 2000 site location study, where there had been disagreement between the NPS and the tribes on the authority of certain maps, challenges to traditional and ceremonial ways of knowing and remembering, and surprises from an archeological survey. While site managers attempted to focus on other elements of site management, these issues had to be addressed; eventually, these issues played a role in the development of the *General Management Plan*. A brief overview of these issues is outlined here, but this history is described in greater detail in Chapter Three.

As described in Chapter Three, a consultation meeting was held at the Cow Palace in nearby Lamar in June 2008 between tribal representatives and park staff.[66] University of Colorado Professor and Director of the Center of the American West Patricia Limerick was

[65] Sand Creek Massacre National Historic Site, "Location and Topics for Interpreting the Story of the Sand Creek Massacre," no date, 3–5.

[66] Ari Kelman describes this meeting in detail in *A Misplaced Massacre*, pages 269–271.

also in attendance; Alexa Roberts noted that Limerick was brought in because of her reputation as "an expert in negotiating controversy about western history." The goal of the meeting was to establish which sources would guide interpretation at the site. She recalled,

> What we wanted to do—what we had in mind was—there were all kinds of questions going on at that time about what sources of information we were using to justify our story and why weren't we using others. . . . We all thought it would be a good idea to ask Patty to facilitate a meeting, where we would talk about our sources of information—that is to get the Park Service out of the middle—so we could say we have consulted with subject matter experts, who have confirmed to us that these are the reliable references to use. That was the idea.

As Alexa Roberts recalled, the meeting "went immediately completely off the rails because what the tribes are hearing—and I get this now [but] I was totally taken aback at the time—was 'We've been working together now for, you know 8 years, we thought you understood our story, we thought you understood where we're coming from, that this is a massacre site and now you're questioning if this is even a massacre site. Yeah, we thought we knew you.' And people were crying, including Patty Limerick. It was brutal and it went totally, unexpectedly, completely off the rails [and] downhill." Ari Kelman described the fundamental conflict at the heart of the meeting: "The tribal representatives had fought for years for some say in how the NPS would depict the violence, and they were unwilling to let an interloper become an arbiter of ongoing disputes." Otto Braided Hair told Kelman in an interview, "We've got a good handle on our own history. We don't need an outsider to tell us about Sand Creek."[67] Roberts acknowledged that it was a major misstep for the NPS: "we didn't mean that at all, that was not at all what we were approaching, but that's what they heard. I get why they heard that."[68]

Following this meeting, the staff's work on the *General Management Plan* continued without any reference to interpretation. Roberts had to explain this unconventional aspect of the plan to the regional office: "Why were we doing a GMP [general management plan] in this unconventional way? Why don't we have interpretation? Why isn't it being guided by interpretive themes? And so forth." Luckily, "We explained it and Rick Frost and James Doyle were giant champions and so we got that kind of smoothed out—that wasn't a big deal—but it was a big deal with the tribes." They went back to the drawing board, because they had no other option but to keep working toward a resolution; otherwise, Roberts said, "we're going to be stuck here forever."[69]

After this meeting, site managers focused on finding ways to resolve the issue of authority by bringing together other NPS site managers, tribal representatives, and other subject-matter experts to look at all of the available information about the Sand Creek

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[67] Kelman, *A Misplaced Massacre*, 269–270.

[68] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[69] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

massacre. After analyzing the information from various sources, everyone realized that the sources corroborated each other. As Roberts put it, "everybody's right." That agreement, she said, "unleashed the interpretation."[70] The consensus meant that the NPS could finally begin planning for the long-range interpretive plan.

There remain ongoing issues concerning the use of the term "massacre" instead of "battle" to describe the events of November 29, 1864. Some newspaper articles continue to document the events as a battle and visitors occasionally send these articles to site staff asking them to correct the record.[71] Other letters received by site staff are from societies that advocate for the site to be interpreted as a battle.[72] Site managers have dealt with these entreaties through interpretive media and programs by focusing on the primary resources from the event such as eyewitness accounts, the findings of the Congressional investigations following the massacre, and text from the Treaty of the Little Arkansas, which describes the events as a massacre and seeks to offer reparations. The site also does not carry the works of "popular authors" who characterize the events as a battle.[73]

The long-range interpretive plan also listed several special issues and concerns, which have been addressed elsewhere in this document. These include the fact that a large part of the core area of the site is tribal trust land; restricting/allowing access to the creek bed to respect sacred ground (including conditions of special use permits to provide or deny access to the creek bed for research, photography, etc.); the loan, use, photographing of artifacts from the Sand Creek Massacre; and visitor safety from natural hazards such as insects, snakes, and climatic extremes of hot and cold.[74]

Interpretation and New Research

Historical research regarding Sand Creek Massacre National Historic Site continues on topics such as the cultural and natural landscape of the site, the historic context of the massacre, and the way of life of the Cheyenne and Arapaho people prior to the massacre and its generational impacts to the present day. New understandings open new opportunities for interpretive media and programming. For example, long-term genealogical research

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[70] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[71] Tom and Betty Kerwin, letter to Sand Creek Massacre National Historic Site staff, March 5, 2009, SAND Electronic Records.

[72] David Hughes, Board of Directors, Old Colorado City Historical Society, letter to Alden Miller, Superintendent, Sand Creek Massacre National Historic Site, February 15, 2008, SAND Electronic Records.

[73] Alexa Roberts and Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[74] National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 8.

conducted by Sand Creek Massacre NHS interpreter Craig Moore has led to a deeper understanding of the social groups represented by the tipis on the maps drawn by George Bent after the massacre.[75]

Special Programs: Connections to Other NPS Units and Organizations

As part of the National Park Service's centennial celebration in 2016, interpretive staff at Sand Creek Massacre National Historic Site worked with other NPS units to tell the Sand Creek Massacre story. This included joint projects and informational brochures with Bent's Old Fort National Historic Site, Washita Battlefield National Historic Site, Fort Larned National Historic Site, and Castillo de San Marcos National Monument. At Castillo de San Marcos in St. Augustine, Florida, the interpretation focused on the survivors from the Sand Creek Massacre who were incarcerated at the castillo. The interpretive media included a joint information brochure and interpretive programing at both units. Craig Moore, from Sand Creek Massacre NHS, additionally researched the "life masks" of the incarcerated massacre survivors—molds or casts made by applying wax or plastic to a living person's face—and matched them to photographs of individuals.[76]

Other special programming included off-site presentations such as those delivered by Craig Moore at Bent's Old Fort NHS. These off-site programs included the topics of women in the fur trade, genealogy, etc. and have been well-received by the public and tribes.[77] Special programing has also included hosting a speaker series with the Crow Luther Cultural Events Center and a community screening of the film "The Sand Creek Massacre and the Civil War."[78]

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[75] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[76] High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 18, SAND Electronic Records.

[77] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[78] Alexa Roberts and Karl Zimmermann, "Letter to the Editor-Roberts and Zimmerman," *Kiowa County Independent,* April 3, 2019, https://kiowacountyindependent.com/news/1553-letter-to-the-editor-roberts-and-zimmerman; Shawn Gillette, "Sand Creek Massacre NHS Partners with Crow Luther Cultural Events Center to Present Free Showing of Award-Winning Film," last modified June 22, 2015, https://www.nps.gov/sand/learn/news/free-showing-of-sand-film.htm; "The Sand Creek Massacre and the Civil War' Film Coming to Eads," *Kiowa County Press*, November 10, 2017.

Conclusion

The development of interpretive themes and language used at the site in talks, brochures, waysides, and other interpretive media has progressed through thoughtful consultation with tribal representatives. It was a long process, but as the NPS and tribal representatives resolved issues of authority surrounding traditional ways of knowing, tribal sources, and sources originating from the US government, interpretation at the site developed rapidly. Loci of interpretation were identified along with interpretive themes, and ongoing research informed these loci. In the first 10 years after the site was opened to the public, special events and off-site programming increased, and site managers strove to connect the story of the Sand Creek Massacre to other events in the nation's history to provide a more complete understanding of the 1864 massacre and its context.

CHAPTER SEVEN

Visitor Use and Management

This chapter discusses management decisions surrounding visitation and public access to Sand Creek Massacre National Historic Site, including the open/closed site schedule and visitor use of the area. Visitor use refers to human presence in an area for recreational purposes and includes education, interpretation, inspiration, and physical and mental health. Additionally, the chapter synthesizes visitation information to discuss trends in visitation over the years covered in this administrative history (2007–2017). The chapter also discusses staff's desired conditions at the site and visitor experience. Desired conditions are statements of aspiration that describe resource conditions, visitor experiences and opportunities, and facilities and services that an agency strives to achieve and maintain in a particular area. Visitor experience comprises the perceptions, feelings, and reactions that a visitor has before, during, and after a visit to an area.[1]

Public Opening of the Site

The NPS Organic Act of 1916 and NPS *Management Policies 2006* require the National Park Service to provide opportunities for the enjoyment of a park unit's resources and values. Also, Sand Creek Massacre NHS's enabling legislation mandates that the site should memorialize, commemorate, and provide information to visitors to enhance cultural understanding about the site, and help minimize the chance of similar incidents in the future. The legislation also states that reasonable needs of descendants must be considered in site planning and operations, especially with respect to commemorative activities in designated areas within the site.

As described in chapters 2 and 5, Sand Creek Massacre National Historic Site was officially dedicated with a special event and ceremony on April 28, 2007, and opened to the public part time in May. Prior to the site's opening, however, significant planning efforts had already taken place. Approved in 2006, the interim site management plan contained initial guidance for public access and use. According to this plan, public access would be permitted in the area of the 1950 granite monument (i.e., Monument Hill) and in the

[1] "IVUMC-Home," National Park Service, US Department of the Interior. Accessed October 12, 2023, https://visitorusemanagement.nps.gov.

former Dawson Ranch Headquarters area (new temporary park support services area). Access to visitor use areas would be permitted via the existing dirt roads. Public access away from these areas, such as off-road or in the "backcountry," would not be permitted.

Immediately following the dedication ceremony, public access into the park unit was limited until on-site facilities and management could be established. During this time, the public accessed the site by appointment only. The interim site management plan proposed that once the site contained the appropriate infrastructure for visitor use and on-site staffing, the park unit would be open during scheduled hours for general public access. The gates at both entrances would remain open during the park unit's hours of operation, and park staff would lock these gates after these hours of operation.[2]

Access

Sand Creek Massacre National Historic Site is 23 miles northeast of the town of Eads, Colorado. To reach Sand Creek Massacre National Historic Site from Eads, most visitors drive east on State Highway 96 approximately 16 miles to the town of Chivington before turning north on Chief White Antelope Way (formerly County Road 54), and traveling along this well-maintained unpaved road for 8 miles to reach the historic site.[3] The site opened to the public one day per week in May 2007.[4] On June 1, 2007, the site expanded to being open 3 days a week through December 1. The site eventually contained the appropriate infrastructure for visitor use and on-site staffing, and beginning on April 1, 2008, the site was open to the public 7 days a week.[5] By 2017, the close of the period covered by this administrative history, the site was open to visitors 7 days per week from 9:00 am to 4:00 pm, April 1 through November 30, and on weekdays, only from December 1 to March 31, with a gate that is closed and locked at the end of each day.[6] Visitors entering the site are directed to a visitor contact station where they are greeted by a ranger and provided with an orientation to the site. Visitors can also find site bulletins, interpretive brochures, and books for sale in the bookstore managed by the Western National Parks Association. Formal group interpretive programs can also be arranged.[7]

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2 National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 44.

3 National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 8.

4 US Department of the Interior, *Budget Justifications and Performance Information, Fiscal Year 2009, National Park Service*, https://www.nps.gov/aboutus/upload/FY_2009_greenbook.pdf. Accessed February 23, 2021, 253.

5 Alden Miller, Sand Creek Massacre National Historic Site Briefing to Senator Ken Salazar, Senator Wayne Allard, Rep. Marilyn Musgrave. February 1, 2008, SAND Electronic Records.

6 National Park Service, *State of the Park Report,* 2017, 40.

7 National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 121.

NPS staff actively create and seek ways to maintain the contemplative atmosphere to respect the solemnity of the events that occurred at the site. In terms of area, less than 10 percent of the site is accessible to the public to protect resources and values. The quiet, contemplative atmosphere, open vistas, and site interpretive walks and talks allow descendants of this massacre and other visitors to connect to the site and sense of place, which includes intangible spiritual qualities (more information on interpretation is in Chapter Six). The enabling legislation authorizes the secretary of the interior to temporarily close portions of the site to the general public to protect the privacy of tribal members engaging in a traditional, cultural, or historical observance. As described in the legislation, any closure would affect the smallest practicable area for the minimum period necessary.[8] Some visitors choose to leave offerings to commemorate those lost in the massacre. These offerings are often left in the Monument Hill area—at the stone marker placed in 1950 or in the designated place at the repatriation area.[9] (See Chapter Three for more information on NAGPRA, the repatriation area, and management of offerings.)

Visitor Use Areas

A thorough description of how the visitor use area developed over time is provided in Chapter Two. In summary, the site's visitor and operations infrastructure is concentrated in the area of the former ranch headquarters, which was acquired in 2005 as part of the core portion of the authorized site boundaries. While the private home was demolished upon acquisition by the NPS and an old barn was removed in 2009, some of the former ranch roads were retained and have become both service roads and the basis for the visitor trail system. The former ranch maintenance shop and office have become the site's maintenance shop, conference room, and potable water treatment facility. An 800-square-foot modular building, located in the developed area of the site, serves as offices for five staff members, as well as an interpretive area, visitor contact station, and Western National Parks Association sales outlet.[10] By 2017 two vault-type comfort stations had been installed, as well as wayside exhibits, visitor parking areas, a ground-level tornado shelter, and a modest visitor use area. The visitor use area is intentionally referred to as such rather than a picnic

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[8] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[9] Sand Creek Massacre National Historic Site, *Policy Directive #14: Items Left at the Monument or Anywhere Within the Park*, December 1, 2014; National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 23.

[10] National Park Service, *State of the Park Report*, 2017, 41; Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

area because of concerns expressed by the Cheyenne and Arapaho tribes.[11] As of 2017, the site had five buildings, and all were in good stable condition and powered completely by electricity with no natural gas or propane.[12]

NPS staff have also been working with Kiowa County since 2007 to rehabilitate the historic Murdock Building as an off-site visitor services facility in the site's gateway community of Eads, pursuant to the historic site's authorizing legislation and NPS directive to prevent impairment to the site's extremely sensitive landscape. Rehabilitation work on the Murdock Building was completed in 2020. The facility houses the site's visitor and research center, which extends the interpretive context of the Sand Creek Massacre beyond the massacre site itself, to include the complex causes and consequences of the massacre as well as further understanding of the Cheyenne and Arapaho people, historically and today.[13] Chapter Two describes efforts to get this facility to where it is as of 2021.

Pedestrian Trails

Two pedestrian trails were proposed under the interim site management plan. One pedestrian trail (now named Monument Hill Trail) runs from the former Dawson Ranch headquarters to the hill where the existing 1950s monument and overlook are situated. A second trail (now named the Bluff Trail) is approximately three-quarters of a mile long and runs along the bluff at roughly the 4,000-foot contour line.[14] The extension of the visitor trail along the bluff line has allowed visitors more opportunities to connect with the timeline and story of the massacre.[15]

Since the site opened, recommended trail upgrades have included applying packed crusher fine material to the trail system for accessibility and building the first permanent interpretive stone sign base. As of 2017, site management maintains 1.75 miles of primitive interpretive trails and interim wayside exhibits, along with Western National Park Association bookstores in two locations, and all walking trails are sand-based with a ¼-inch crusher fine walking surface.[16] Interpretive wayside exhibits provide visitors with information about the massacre. Visitor information is also provided by a ranger-led

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[11] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[12] National Park Service, *State of the Park Report,* 2017, 42.

[13] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site,* 2017, 30–33.

[14] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 45.

[15] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 23.

[16] National Park Service, *State of the Park Report,* 2017, 36–41.

interpretive program, a site brochure, site bulletins, and other printed material. Stationary interpretive ranger talks are offered during regular park hours at 10 am and 2 pm at the Monument Hill Overlook. Talks last approximately 30 to 40 minutes.[17]

Monument Hill and its overlook are accessed via a trail that begins at the visitor use area. The Monument Hill area includes an overlook above Big Sandy Creek, a shade structure, and the repatriation area.[18] Benches are provided at the shade structure and can accommodate up to eight visitors, though the visitor facilities that currently exist in this area were not completed until 2018 (after the period covered in this administrative history).

An interpretive walking trail, known as the Bluff Trail, leads from the Monument Hill overlook area to the northwest, along the bluff of Big Sandy Creek. Shown as a proposed feature in the preferred alternative in the 2015 *General Management Plan*, the Bluff Trail was installed in 2016.[19] The Bluff Trail overlooks the creek bed, allowing visitors to follow the course of the massacre as tribal members fled along the creek, with soldiers in pursuit. From vantage points along the trail, visitors are able to view the sandpits to which Cheyenne and Arapaho people had fled during the massacre.[20] The placement of this trail along the bluff was guided by cultural landscape considerations and its proposed use for reflection and solitude.[21] The area for the Bluff Trail was previously surveyed as part of the "Big Head" archeological project and surveyed in 2015 specifically for the length of the trail.[22] A trail study helped inform placement of the trail, and the Denver Service Center provided a design that included cost estimates for the trail design, subsurface materials, waysides, benches, and general signage. Site staff surveyed potential locations of benches along the trail and ensured that each bench was not visible from another bench, further enhancing the visitor experience of peace, solitude, and reflection.[23]

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[17] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 4; "Sand Creek Massacre National Historic Site (US National Park Service)," *National Park Service*, US Department of the Interior. Accessed September 1, 2021, https://www.nps.gov/sand/index.htm.

[18] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 4; "Sand Creek Massacre National Historic Site (US National Park Service)," *National Park Service*, US Department of the Interior. Accessed September 1, 2021, https://www.nps.gov/sand/index.htm.

[19] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 90–91.

[20] Karen Wilde and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[21] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 23; "Sand Creek Massacre National Historic Site (US National Park Service)." *National Park Service*, US Department of the Interior. Accessed September 1, 2021, https://www.nps.gov/sand/index.htm.

[22] Karen Wilde, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Planning, Environment & Public Comment (PEPC) Project Search #66687, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 2021; Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

[23] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Planning, Environment & Public Comment (PEPC) Project Search #66687, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 2021.

Figure 17: The Bluff Trail at Sand Creek Massacre National Historic Site.
Photo by Hillary Conley, May 2021.

There were some concerns about the Bluff Trail terminus along the fence line at West Boundary Road, however, ultimately the course of the trail was selected due to previous disturbance of the area.[24] By situating the Bluff Trail along an area that was already disturbed, impacts to undisturbed natural and cultural resources were minimized. No ground disturbance was necessary to create the trail and surface improvements consisted of laying crusher fines 5 feet wide and 5 inches deep along the full length of the trail. During design of the Bluff Trail, one suggestion was made for the trail to be drivable, but this suggestion was dismissed. The trail, being limited to pedestrian use and having a crushed stone surface treatment, allows the trail to remain unobtrusive in the landscape and viewshed.[25] The crushed stone surface was also intended to be durable and improve compliance with the Architectural Barriers Act Accessibility Standards (ABAAS).

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[24] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[25] Planning, Environment & Public Comment (PEPC) Project Search #66687, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 2021; Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Visitation and Demographics

The Special Resource Study that analyzed the feasibility and suitability of establishing Sand Creek Massacre National Historic Site included projected visitation and expenditures of establishing and opening a new historic site to the public. In this study, the Sand Creek Massacre Historic Site was projected to have an annual visitation of 20,000 to 30,000 people, based on visitation figures for nearby Bent's Old Fort National Historic Site. Public visitation to the site expanded gradually over time as visitor facilities became available but has not yet approached those initial projections.[26]

When the site first opened, visitors were not able to easily communicate via telephone with NPS staff at the site because of the limited number of telephone lines, the lack of voice mail or answering service, sparse cell phone service, and the absence of having an automated receptionist that stated information like hours and how to get to the site. In FY 2008 and 2009, PMIS #138676 and PMIS #143863 installed a phone and computer system, which allowed visitors to communicate with site staff and improved visitor safety at the site.[27]

Site visitation has gradually increased since opening to the public in 2007, with the highest annual attendance occurring during June and July.[28] In 2008, Superintendent Alden Miller estimated total visitation from June 1 to December 1, 2007, at 1,676.[29] Since April 2010, when the park began actively recording its monthly visitation, visitation has slowly but steadily risen.[30] In 2011, the site received 3,935 visitors. In 2014, which included the 150th anniversary commemoration, the site experienced a record visitation of 7,402. The annual visitation for 2015 was 5,887 visitors, which is a marked increase over previous years. In 2017, Sand Creek Massacre National Historic Site had 9.5 permanent employees and annual visitation had increased to between 6,000 and 7,000 people.[31] Visitation statistics, specific reports, and other visitor information from October 2009 to present day can be found at https://irma.nps.gov.[32]

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[26] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 12.

[27] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #138676, #143863.

[28] "Annual Park Recreation Visits for Sand Creek Massacre National Historic Site," *National Park Service*, US Department of the Interior. Accessed September 1, 2021, https://irma.nps.gov/STATS/Reports/Park/SAND.

[29] Alden Miller, Sand Creek Massacre National Historic Site Briefing to Senator Ken Salazar, Senator Wayne Allard, Rep. Marilyn Musgrave. February 1, 2008, SAND Electronic Records.

[30] National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, 2020, 13. On file at Sand Creek Massacre NHS and the Denver Service Center.

[31] National Park Service, *State of the Park Report,* 2017, 38.

[32] "Annual Park Recreation Visits for Sand Creek Massacre National Historic Site," *National Park Service*, US Department of the Interior. Accessed September 1, 2021, https://irma.nps.gov/STATS/Reports/Park/SAND.

Every year, visitors to National Park Service lands across the country spend billions of dollars in local gateway regions, contributing much-needed revenue to local economies. According to NPS estimates, spending in the local area by visitors to SAND reached a peak of approximately $415,000 in 2014. This peak mirrored the record visitation numbers for that year—the 150th anniversary of the massacre.[33]

Unfortunately, due to a lack of data, the precise demographics of visitors to Sand Creek Massacre National Historic Site are currently unknown. The LRIP, although prepared after the period covered by this administrative history, does include some anecdotal observations by park staff and visitation records that suggest characteristics of visitors to SAND. In 2016, Colorado residents were the greatest proportion of visitors to the park, followed by Kansas, Texas, and Oklahoma residents. International visitors came primarily from England and Germany, followed by Australia and Canada. Many park visitors were on vacation or traveling to an out-of-state location and decided to visit after seeing signs for the park on the highway. The site regularly draws descendant communities of survivors and victims of the massacre, as well as descendants of soldiers. It also draws visitors from other Native American tribes and indigenous peoples from other countries. The site also draws K-12 student groups and groups of college and university students, as well as groups of soldiers from the US military participating in "Battlefield Studies."[34] The 2020 long-range interpretive plan estimated that the average length of stay per visit is short, perhaps 1 hour to 1.5 hours.[35]

Visitor Use

Site managers recognized early on that some visitor uses would not be appropriate for the site.[36] Sand Creek Massacre National Historic Site is a day-use area. Visitor uses include but are not limited to walking, hiking, healing activities, traditional tribal observances, quiet contemplation and reflection, and photography. Visitors can learn about the massacre from an interpretive ranger, rest among the trees in the visitor use area; walk to the top of Monument Hill; look for rare birds, insects, and flora; admire the High Plains landscape along the Bluff Trail; and honor the deceased by paying respect at the repatriation area. To participate in other activities, such as to photograph or film for commercial use, visitors

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[33] "Visitor Spending Effects for Sand Creek Massacre National Historic Site." *National Park Service*, US Department of the Interior. Accessed September 1, 2021, https://www.nps.gov/subjects/socialscience/vse.htm.

[34] National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, On file at Sand Creek Massacre NHS and the Denver Service Center, 2020, 14.

[35] National Park Service, *Sand Creek Massacre National Historic Site Long Range Interpretive Plan*, On file at Sand Creek Massacre NHS and the Denver Service Center, 2020, 14.

[36] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

must acquire a special use permit. As a day-use area, camping is not allowed. The nearest primitive camping facilities are 25 miles southwest of Eads at the Nee Gronda and Nee Noshe Reservoirs. Limited RV camping is available in Eads.[37]

Prior to the dedication of the site or the interim site management plan, site staff considered several visitation issues including tribal use, future public visitation, and resource management. In 2005, Karl Zimmermann mowed a trail that would allow access to the Chivington Canal and Sand Creek creek bed. Tribal representatives were given rides to access the creek bed until after the April 2007 dedication when access to the creek bed was closed to the general public and allowed only by way of a special use permit. The mowed trail was part of the site managers' early consideration of installing an interpretive loop trail through the village site. Implementation of alternative E in the *General Management Plan* resulted in creation of an interpretive walking trail, although in a different location and as an out-and-back trail.[38]

As described in the 2015 *General Management Plan*, visitor use has had few adverse effects on the resources of Sand Creek Massacre National Historic Site. However, as visitor numbers increase, the potential for adverse effects on natural and cultural resources may also increase. For example, a large number of visitors at one time could affect visitor experience and result in resource damage. Therefore, it is important for the National Park Service to proactively prevent problems that could result from visitor use. The *General Management Plan* states that NPS staff will monitor resources and visitor use and judge whether the desired conditions are being exceeded. The *General Management Plan* also includes possible mitigation measures to ensure that desired conditions for both visitor experience and resources are maintained. "Visitation would be controlled by the number and quality of facilities, by management actions, and by cooperative local efforts and initiatives."[39]

Desired Visitor Experience

To fulfill the NPS Organic Act of 1916 and NPS *Management Policies 2006* that require the National Park Service to provide opportunities for visitor enjoyment and appreciation of a park unit's resources and values, Sand Creek Massacre National Historic Site's staff needed to establish which visitor activities and experiences were appropriate for the site. Staff's actions were guided by various planning documents.

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[37] "Sand Creek Massacre National Historic Site things to do (US National Park Service)." *National Park Service*, US Department of the Interior. Accessed September 1, 2021, https://www.nps.gov/sand/planyourvisit/things2do.htm.

[38] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[39] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 96.

According to the 2006 interim site management plan/EA, the site should provide opportunities for

- a cross-cultural and spiritual experience;
- understanding of the relationships of present-day tribal people, especially Sand Creek descendants, to the massacre site;
- interacting with descendants of Sand Creek Indian victims or survivors;
- access to tribal oral histories of the Sand Creek Massacre for appreciation and understanding by non-Indians and for remembrance by tribal youth;
- a physical connection with the massacre site's natural setting;
- interpretive and educational programs, both on and off site, which reach all age levels and cultural backgrounds; and
- solitude and contemplation at the massacre site.

In addition, that 2006 plan described what the desired visitor experience would look like:

> the public would be encouraged to enter the park unit via the east access road, and head to the former Dawson Ranch area (new temporary park support services building). Here, they could make contact with the park staff and gather information about their visit. Visitors would then be encouraged to visit the area of the overlook with the existing 1950s stone monument either by foot along the pedestrian trail or by vehicle by returning to County Road W and then driving up the western access road. The remainder of the park would be closed to public access and construction activities to help preserve the natural and cultural and natural resources in this area. During the interim, public access would mostly be self-sufficient, meaning that visitors would be unguided for the most part; however, some guided tours may be available depending on appropriate levels of staffing and infrastructure. The availability of guided tours, if any, during the interim would be determined adaptively as interim operations begin. No fees would be collected from visitors to the park unit; however a donation box may be established. Also, there would be no concessions in the interim and visitors would not be permitted to stay in the park unit overnight.[40]

As staff made progress toward their initial goals, they further refined these plans.

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[40] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 44–45.

The site's 2015 *General Management Plan* emphasized that "preserving the landscape and interpreting the historic event are integral to helping visitors gain a better understanding of the Sand Creek massacre and its enduring impact on the Cheyenne and Arapaho people and the history of the United States."[41] The plan gave careful consideration to this interplay between landscape and interpretation, and outlined the desired visitor experience as follows:

> [V]isitors would be able to access the monument along approximately 1.5 miles of trails along the bluff above Sand Creek, providing opportunities to interpret the natural landscape and resources and the role they played in the events of Sand Creek before, during, and after the onslaught. Low-profile wayside exhibits, site bulletins, or ranger-guided tours would accentuate interpretation of the natural landscape and how it influenced the evolution of the human environment as well. From the stone monument, the trail would extend along the bluff of Sand Creek allowing visitors to view the creekbed where the massacre took place; however, there would be no loop connecting back to the monument, so visitors would have to retrace their steps. Visitors could also begin their hike on the trail from the parking area on the west end of the trail. Self-guided or ranger-guided tours could access various parts of the site and story.
>
> The sensitive resource zone, placed along the creek, would be closed to visitors.
>
> A visitor center addressing the broader context of Sand Creek would be developed off-site as part of a research and learning center in the town of Eads. Off-site interpretation would focus on the larger context of Sand Creek, the legacy of conflict, impacts of the tragedy on the Cheyenne and Arapaho tribes, and lessons learned.[42]

Visitor Safety and Satisfaction

As described in the 2017 *Foundation Document*, NPS staff worked extremely hard to create a safe and educational visitor experience during the first 10 years after the site's opening.[43] The safety of visitors is a priority. The site provides a safety briefing with each visitor orientation and site bulletins covering a variety of safety topics are available as handouts. Safety briefings are held monthly during staff meetings and the site is part of a

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[41] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 90.

[42] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 121.

[43] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 33.

multi-park safety zone administered by a professional safety officer. As of 2017, the site had no recordable law-enforcement incidents or visitor accidents or injuries since it opened to the public in 2007.[44]

In 2015, the site visitor satisfaction score was 91 percent and rose to 94 percent in 2016, according to visitor satisfaction surveys. Though visitors still voice concerns over lack of permanent facilities, the *General Management Plan* identified strategies that should ameliorate these concerns as the site continues to develop.[45]

Conclusion

The development of Sand Creek Massacre NHS facilities and visitor services progressed over time to address increasing visitation and use. All actions were coordinated with thoughtful consultation with tribal representatives through planning efforts. After the site was opened to the public, visitor use increased especially during years that included major public commemorations, such as the 150th anniversary of the massacre in 2014. While providing opportunities for public understanding and appreciation, site managers also strive to preserve, as closely as practicable, the cultural landscape of the site as it appeared at the time of the Sand Creek Massacre.[46] Therefore, limited visitor facilities are available on site. It is also key for site managers to communicate to visitors what constitutes appropriate use and respectful behavior. In such a solemn environment, appropriate uses include viewing the landscape and being "transported" to 1864. Values such as solitude, open views, and the preserved landscape establish a unique sense of place that encourages visitors to reflect on the events that occurred at the site and to gain a more complete understanding of the 1864 massacre and its context.

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[44] National Park Service, *State of the Park Report,* 2017, 34.

[45] National Park Service, *State of the Park Report,* 2017, 31.

[46] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

CHAPTER EIGHT

Integrated Resource Management

The National Park Service is a steward of many of America's most important natural and cultural resources, and it is charged with preserving them unimpaired for the enjoyment of present and future generations. If they are degraded or lost, so are the parks' reason for being. Every park in the system has cultural resources—the material evidence of past human activities. Finite and nonrenewable, these tangible resources begin to deteriorate almost from the moment of their creation. In keeping with the NPS Organic Act of 1916 and varied historic preservation laws, park management activities must reflect awareness of the irreplaceable nature of these material resources.[1]

In the case of Sand Creek Massacre National Historic Site, all the cultural resources and the natural resources testify to the murder and mutilation of hundreds of Cheyenne and Arapaho ancestors. The trauma from this massacre has been passed down through generations of Cheyenne and Arapaho descendants, and all resources within the site are infused with this ethnographic layer of trauma. This chapter provides a discussion of the cultural and natural resource management at the site, including the connection between these types of resources. At Sand Creek Massacre National Historic Site, staff have approached the management of cultural and natural resources in research, planning, and stewardship with extreme sensitivity and in consultation with Cheyenne and Arapaho tribal representatives. For Cheyenne and Arapaho people, the cultural and natural resources at Sand Creek Massacre National Historic Site are inseparable. Uncoupling the two is unnatural for Arapaho and Cheyenne people, and the National Park Service recognizes this fact. This chapter therefore combines the discussion and development of resource management into this one chapter. As cultural and natural resources are intimately connected at the site, so too are tribal concerns for these resources. This has required that the site's managers and staff foster close relationships with tribal members and work in close consultation with them to manage these integrated resources.

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[1] National Park Service, *Director's Order #28: Cultural Resource Management*, 1998.

Cultural Resource Management

Within the national park system, cultural resource management involves research to identify, evaluate, document, register, and establish other basic information about cultural resources; planning to ensure that this information is well integrated into management processes for making decisions and setting priorities; and stewardship under which planning decisions are carried out and resources are preserved, protected, and interpreted to the public.[2]

The National Park Service organizes cultural resources into several resource categories. These include cultural landscapes (special places that show connections between people and the land); archeological resources (the remains of past human activity); ethnographic resources (expressions of human culture and the continuity of cultural systems including the tangible and intangible); structures (anything that extends the limits of human capabilities, such as buildings and monuments); and museum objects (manifestations of behavior and ideas and fragments of the world through time and life).[3]

At Sand Creek Massacre NHS, the cultural resource management and natural resource management were administratively separated. The site's natural resource program was headed by Karl Zimmermann, and the cultural resource program was managed out of Bent's Old Fort National Historic Site first by Kate Hogue, then Rhonda Brewer, and then Cynthia Wiley. (Sand Creek has never had its own distinct cultural resource program.) SAND managers and staff have worked collaboratively with the site's tribal representatives to ensure regulatory compliance and sensitivity. These same managers additionally serve on the site's Collections Advisory Committee,[4] which represents relevant disciplines at each NPS site to review and make recommendations on each site's museum collection.[5] Some of the cultural and natural resource management positions are furthermore administratively shared with Bent's Old Fort NHS. For example, Bent's Old Fort NHS provides a museum curator to support the curatorial care of objects from Sand Creek Massacre NHS.[6] This shared position and the museum curatorial facilities and work for Sand Creek Massacre NHS are described in more detail below.

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2 National Park Service, *Director's Order #28: Cultural Resource Management*, 1998.

3 National Park Service, *Director's Order #28: Cultural Resource Management*, 1998.

4 Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

5 National Park Service, *Museum Handbook, Part 1,* 2003, 2:4–2:5. Accessed September 15, 2021, https://www.nps.gov/museum/publications/mhi/Chapter%202.pdf.

6 Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Cultural Landscape

The site's authorizing legislation (2000) required the protection and preservation of the important topographic features of the site, artifacts, and other physical remains of the Sand Creek Massacre, and the cultural landscape as close as possible as it appeared at the time of the Sand Creek Massacre.[7] Located in a rural area of Colorado, the site's landscape has experienced comparatively little disturbance and development since the massacre. For tribal descendants, the landscape evokes history and is part of their identity. For others, the landscape evokes contemplation, reflection, and seeking understanding of culture, history, and the impact of the massacre on Cheyenne and Arapaho people.[8]

The notion that the entire national historic site is a cultural landscape is recognized in the enabling legislation, tribal consultation, and NPS planning efforts. For example, the 2006 interim site management plan/EA describes baseline conditions and analyzes potential impacts for cultural landscapes and ethnographic resources, in addition to visitor use and experience, and site operations. The plan describes the site as encompassing the location of the Cheyenne and Arapaho encampment, the points where the Colorado regiments first spotted the encampment, and the location of the tribes' pony herds. The site also includes the general path of the battalion advancements, skirmishing, and other collateral action; the military bivouac area of November 29–30; places in the streambed and along its banks where the Cheyenne dug pits in which to hide and fight; and the points where battery salvoes were launched into the camp and later into the pits.[9]

The 2015 *General Management Plan* noted that neither a cultural landscape inventory nor a cultural landscape report existed at the time of its development, and similarly, the 2017 *State of the Park Report* noted that no cultural landscapes had been identified or documented at the park.[10] Instead, the report mentioned that there had been some early consideration of an ethnographic landscape study, which is also mentioned in correspondence between Roberts and Jill Cowley.[11] The *State of the Park Report* recommended that the topic of cultural landscapes be revisited in the future.[12] Nevertheless, to date there is no formal planning document that focuses on the site's cultural and ethnographic landscape.

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[7] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, i.

[8] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

[9] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 9.

[10] *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 30.

[11] National Park Service, *State of the Park Report,* 2017, 26; Jill Cowley, Historical Landscape Architect, Program Lead, IMR Cultural Landscapes Program, email to Alexa Roberts, Superintendent, Sand Creek Massacre National Historic Site, June 29, 2004, SAND Electronic Records.

[12] National Park Service, *State of the Park Report,* 2017, 26.

Despite this lack of formal documentation, the enabling legislation, studies prior to 2007, and sensitivity to tribal worldview and tribal consultation have led site managers to consider the entirety of the landscape as culturally and ethnographically important.

To fulfill the enabling legislation to preserve and interpret the landscape as it appeared in 1864, site staff brought together all the information that they, tribal descendants, and subject-matter experts had accumulated regarding the massacre landscape. Previous studies had identified key areas of the massacre landscape, which Kelman (2016) covers at length in the first volume of administrative history. However, as recounted in Roberts and Zimmermann's oral histories, a synthesis of all the available information and resources had not been pursued since the site location study due to unresolved conflict from that study's consultation process. [13] Site managers avoided interpreting cultural landscape elements until it was no longer possible to do so. When all the information was brought together, however, site managers, tribal representatives, and subject-matter experts realized that the historic sources, tribal oral histories, and contemporary historic and archeological research all supported each other in establishing key locations of the massacre. As Alexa Roberts noted her oral history interview, "everybody's right—George Bent was right, the archeology was right—everybody's right." Zimmermann concurred: "It was an aha, ta-da."[14]

While the cultural landscape has not changed drastically since 1864, agricultural use and other activities have caused changes, leading site managers to undertake restoration projects. One example is a project that involved 2 miles of visually intrusive aboveground power lines belonging to the Southeastern Colorado Power Association.[15] The poles were removed, and the electric lines were buried. The 2011 PMIS project submission noted that the power poles and power line were the last human-made visual intrusion on the landscape, and their removal would move the site closer toward fulfilling the enabling legislation's direction to protect and preserve "as closely as practicable, the cultural landscape of the site as it appeared at the time of the Sand Creek Massacre." The NPS consulted Cheyenne and Arapaho tribal representatives and they agreed that burying the lines was an extremely high priority. Kiowa County and neighboring landowners also agreed that the project would be beneficial. The project was funded in FY 2013 and WASO utility contracting handled the project, which was completed in 2015.[16] (Note that additional landscape restoration efforts are discussed later in this chapter, under the headings "Prairie Restoration" and "Riparian Restoration.")

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[13] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

[14] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[15] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #164043.

[16] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #164043.

The addition of Section 36 to the site boundary in 2015 provided additional opportunities to preserve and interpret the cultural landscape. Two years later, in 2017, an interpretive pullout and waysides were installed along Chief White Antelope Way to orient visitors to the site and allow them to experience the large viewshed that encompassed the entire massacre.[17] Initial Section 106 compliance for installation of the pullout and wayside noted that the viewshed from Monument Hill and the interpretive trail were not to be impacted, and that the area had been previously surveyed in 2012. Kiowa County had agreed to the development of the pullout as well as to provide the road base and gravel materials. The plan for the pullout had been addressed in previous consultation, and the site requested SHPO concurrence for a finding of no adverse effect. An internal park communication error occurred, however, and the pullout was constructed in late 2016 before the Section 106 consultation process was completed. As a result, the Advisory Council for Historic Preservation became involved with the project. Concurrence with the SHPO was attained on September 6, 2018. Documents for this project—including correspondence between the site, Kiowa County, and the SHPO's office–can be found under PEPC Project 68348. These events provided important lessons for site managers regarding the need for clear internal communication as well as with external partners.[18]

Ethnographic Resources

The National Park Service defines ethnographic resources as the basic expressions of human culture and the basis for continuity of cultural systems. These cultural systems include the tangible and intangible, such as traditional arts, native languages, religious beliefs, and subsistence activities.[19] As Roberts has noted, the entirety of Sand Creek Massacre NHS is an ethnographic resource: "the grasses, the plants, the animals, land forms, creek, the spring. They all have special significance but taken as a whole, the entire site is seen as a sacred site. The significance emanates from the land, from the stories that are embedded in the land."[20] These ethnographic resources are fundamental to the site, and tribal access and use is fundamental to tribal identity—and especially descendants' identity. Ethnographic resources are prioritized in the enabling legislation, in site planning documents, and through management actions.

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[17] Planning, Environment & Public Comment (PEPC) Project Search #68348, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 12, 2021; High Plains Group, "Proceedings of the 1st Annual High Plains Group Retreat," 13, SAND Electronic Records; Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[18] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[19] National Park Service, *Director's Order #28: Cultural Resource Management*, 1998.

[20] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

The enabling legislation supports the protection of ethnographic resources and cultural continuity by explicitly mentioning the Cheyenne and Arapaho Tribes of Oklahoma, the Northern Cheyenne Tribe, and the Northern Arapaho Tribe, and by outlining descendants' rights, access to, and use of federally acquired land within the site.[21] The terms and conditions of tribal access and use have been developed over the years through consultation and planning. Some of the management actions that guide access and use include entering into cooperative agreements with the tribes and established processes to both facilitate and manage use such as a special permitting process, an offerings policy, and a repatriation site management plan.[22] The *General Management Plan* includes an analysis of the ethnographic resources such as topographical features of the creek bed, springs and wetlands, viewsheds, campsites, lodgepole trails, and the intangible spiritual qualities of the landscape.[23]

Some descendants can detect the spirits of their ancestors at Sand Creek Massacre National Historic Site, and others have had other experiences with specific animals and plants, light phenomena, and other means that indicate the presence of ancestors. Cheyenne and Arapaho elders have additionally offered prayers and blessings at the site.[24] This continued connection with the ancestors and the site—including Cheyenne and Arapaho descendants, as well as members of the general public, leaving items and offerings at the site—indicated a need for an offerings policy. The site's policy was developed over numerous consultations that took place from 2005 to 2007 and additional consultations that readdressed some specific topics from 2007 to 2014. The policy categorizes items left at the site and provides guidance on how they should be handled, managed, or deposited in accordance with its category. In general, items left at the park are scheduled to be cleared monthly or at the direction of site management, but site staff are to immediately respond when unusual amounts of money or items that detract from the site are left. The offerings policy also instructs site staff to document when new items are left. Instruction for some general items include relocation and burial at the site, north of the headquarters but not in the repatriation or sensitive resource areas. Prayer cloths left in the sensitive resource area are not to be touched and consultation occurs when they are found to determine how they

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[21] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[22] Sand Creek Massacre National Historic Site, *Policy Directive #14: Items Left at the Monument or Anywhere Within the Park*, December 1, 2014; Cannon, *Plan for Repatriation Site Management at Sand Creek Massacre National Historic Site*, 1–17.

[23] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 111, 137.

[24] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

should be handled.[25] The site's tribal liaison, Karen Wilde, was primarily responsible for handling and depositing memorial items at the site; however, the policy states that removal of items should be carried out by two staff members.[26]

There are many examples of cultural continuity among living Cheyenne and Arapaho descendants and their ancestors at Sand Creek Massacre NHS, which are embedded in the legislation, planning documents, and management actions. Regarding the sensitive resource area and ethnographic activities, the tribes had expressed their need to maintain a modern ceremonial connection, even before the transfer of tribal trust lands. At the time of the interim site management plan, a location in the sensitive resource area was designated for these ceremonial purposes as well as the National Park Service's responsibilities in maintaining the area. Ceremonial activities were anticipated to include setting up tipis and staying overnight.[27] During the 150th commemoration of the massacre in 2014, tipis were put up in this area and the visual effect demonstrated a clear link between the time period of the massacre, historic photos of Cheyenne and Arapaho lodges, and identities of living Cheyenne and Arapaho people. The site continues to connect contemporary people with *their own history*.[28]

Sensitive Resource Area

In the Cheyenne and Arapaho worldview, the cultural landscape cannot be separated from the natural landscape. The entire area encompassed by Sand Creek Massacre NHS is considered sacred by the Cheyenne and Arapaho Tribes because their ancestors' blood saturated the land. Within this overall sacred landscape, the creek bed where the massacre took place has an especially strong cultural significance.[29]

Though the creek area was initially open to both tribal and visitor access, the enabling legislation authorizes the secretary of the interior to temporarily close portions of the site to the general public to protect the privacy of tribal members engaging in a traditional, cultural, or historical observance. As described in the legislation, any closure must affect the smallest practicable area for the minimum period necessary.[30] During the dedication ceremonies and opening of the site in April 2007, the area was open for tribal use, and

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[25] Sand Creek Massacre National Historic Site, *Policy Directive #14: Items Left at the Monument or Anywhere Within the Park*, December 1, 2014.

[26] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Sand Creek Massacre National Historic Site, *Policy Directive #14: Items Left at the Monument or Anywhere Within the Park*, December 1, 2014.

[27] Planning, Environment & Public Comment (PEPC) Project Search #15808, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 2021.

[28] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

[29] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

[30] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

Cheyenne and Arapaho people camped near the creek bed.[31] However, during the consultation process for the interim site management plan, tribal representatives requested that the creek be considered sacred and permanently restricted from access by the general public.[32]

Once the National Historic Site was established and the site was under the administration of the NPS, legislative and constitutional (1st Amendment) requirements meant that the NPS could not preclude public use while allowing tribal use. During the general management plan consultations in 2011, the tribes agreed unanimously that closure of the area for the public meant closure for everyone, except under the circumstances that a special use permit might be issued—which could apply to anyone. The tribes' preferred alternative, put forward by Otto Braided Hair, sought to protect the bed as a sensitive resource.[33] In keeping with the legislation, tribal members engaging in a traditional, cultural, or historical observance may access the sensitive resource area. Before being allowed access, however, they must obtain an NPS special use permit.[34] NPS staff access was additionally limited to essential operations.[35] The special permit administrative activity was entered into the NPS Planning, Environment & Public Comment (PEPC) system in 2018 and was completed at the end of the year. [36]

Along the creek bed, additional resources have special meaning, such as a particular grouping of cottonwood trees at and above the high flood line. Since the creek has since flooded over the years, any period trees located below the high flood line would not have survived since the time of the massacre. However, some of the cottonwood trees at and above the high flood line may have been seedlings or saplings at the time of the massacre, as General William Tecumseh Sherman noted the presence of young cottonwoods when he arrived at the site in 1868.[37] In October 2005, researchers from the Institute of Arctic and Alpine Research (INSTAAR) at the University of Colorado Boulder visited the site to assess the cottonwood stands. Core samples taken from the cottonwood trees were inconclusive

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[31] US Department of the Interior, National Park Service, *Remembering Sand Creek: An Administrative History,* by Ari Kelman. Draft, 2016, 103.

[32] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 39, 70–77.

[33] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 64, 66, 89–90, 251. The closure of the creek bed appears in the no-action alternative as well as alternative E where it was zoned as a sensitive resource area. A date for when the decision to close the creek bed for access is not clear in the documentation. Text in the *General Management Plan* notes closed access to the public (89–90), but Table 1 on page 64 and correspondence in Appendix B (251) indicates the area would be closed to all visitors; Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

[34] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[35] National Park Service, *State of the Park Report*, 2017, 34; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 89–94.

[36] Planning, Environment & Public Comment (PEPC) Project Search #84294, https://pepc.nps.gov/projectHome.cfm?projectId=15808. Accessed August 17, 2021.

[37] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

in determining their age, but did not rule out the existence of these trees as saplings in November 1864.[38] Thus, these trees retain special importance and are viewed by tribal representatives and park managers as potential "witness trees" that may have witnessed the horrific events of November 29, 1864. The trees that were present in 1864 are a feature of some tribal oral history records.[39] Some of these oral histories relate stories of ancestors who saved their own lives or their children's lives by hiding in hollowed out logs of trees, likely driftwood.[40]

Figure 18: In 2005, researchers conducted an analysis of riparian cottonwood stands at Sand Creek Massacre National Historic Site to locate period trees, or "witness trees."
Photo by NPS staff. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

[38] Jeff Lukas and Connie Woodhouse, *Riparian Forest Age Structure and Past Hydroclimatic Variability, Sand Creek Massacre National Historic Site*, Institute of Arctic and Alpine Research, University of Colorado-Boulder, Boulder (Colorado), 2006.

[39] Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[40] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017; National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

In addition to the cottonwood trees, one spring remains in the sensitive resource area, though additional springs may have been present in 1864. Roberts noted that spring has a sacred significance to Cheyenne and Arapaho peoples independently, but especially as part of the massacre landscape.[41] Some oral histories collected during the site location study spoke to the cultural importance of fresh water in the morning and the springs in the creek bed made the area good place for an encampment.[42] The spring that remains at the site is a topographically, culturally, and ethnographically sensitive resource.

Finally, the sand pits along the creek bed are a feature of the sensitive resource area and overall ethnographic landscape. These sand pits, upstream from the encampment, were where retreating noncombatant Cheyenne and Arapaho people dug in desperation to escape the massacre. Soldiers, however, surrounded and fired into them. Howitzers were also brought up and fired into the pits at almost point-blank range. Many individuals lost their lives in this area.[43]

The *General Management Plan* affirms the designation of the sensitive resource area in the preferred alternative and maps the sensitive resource zone along the creek bed. NPS management activities were also limited to only those essential for site operations, which would be monitored for impacts to cultural and natural resources.[44] During consultation for the *General Management Plan*, there was discussion among the tribal representatives about use of the creek bed, with the decision ultimately being made to continue to not allow public use and only tribal use with a special use permit.[45] The decisions were based, in part, on the heavy use of the creek bed during the dedication ceremony. The tribal representatives unanimously agreed that they did not want to repeat that level of use or set a precedent of heavy use in such a sacred area—"what is unanimously considered to be the most sensitive area of the massacre site," according to Alexa Roberts.[46]

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[41] Alexa Roberts, interview with the National Center for Preservation Technology and Training, August 9, 2017.

[42] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000; National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/Environmental Assessment*, 2015, 47, 115–116; National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

[43] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 7, 49; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 8-36 to 8-37.

[44] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 89–94.

[45] Alexa Roberts, Karen Wilde, Cynthia Wiley, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[46] Alexa Roberts, phone call with Laura Miller, December 20, 2022.

Archeological Resources

Most of the archeological resources at Sand Creek Massacre National Historic Site are associated with the massacre event in 1864. The precontact use and occupation of the Sand Creek Massacre NHS is not well understood. Most information is anecdotal from local collectors and isolated surface finds, and the site has not been intensively surveyed for archeological remains that predate the 1864 massacre. There is evidence outside of the site boundaries of human use of the area from the Paleoindian, Archaic, and Late Precontact periods.[47] Evidence for the 1864 massacre event is somewhat complicated by later visitors to the site, such as members of the Doolittle Committee in 1865 and Lieutenant Samuel Bonsall's and General William Tecumseh Sherman's visit to the site in 1868.[48] Sherman requested that his escort collect anything of value from the site, which included human remains, and he left with nearly a wagon full of items.[49] Bonsall's map of the site in 1868 was an important primary document in the site location studies, which included archeological excavations.[50] These were the only excavations to take place early in the site formation as other archeological investigations were limited to surface inventories to replace a fence line and evaluate the Dawson Ranch complex, and archeological monitoring activity for new buried electrical lines (2006), all of which predate the dedication of the site in 2007.[51]

Archeological investigation at the site from 2007 to 2017 included a survey of the visitor use and administration location (former Dawson Ranch area) prior to the opening ceremony, archeological monitoring for the installation of the tornado shelter,[52] an

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[47] National Park Service, *State of the Park Report,* 2017, 20–30; National Park Service, Intermountain Cultural Resources Management Archeology Program, *Archeological Investigations at Sand Creek Massacre National Historic Site October 12–13, 2005,* by Cynthia L. Herhahn and Janet D. Orcutt, 2015, 2–5.

[48] See United States Congress, House, *Report of the Joint Committee on The Conduct of the War,* 38th Cong., 2d sess, 1865. The section "Massacre of Cheyenne Indians" is on pages 153–264 and contains various testimony, papers, proclamations, telegrams, etc. that provide information and context to the massacre. https://archive.org/details/reportjointcomm01goocgoog/page/n6/mode/2up?view=theater. Accessed August 26, 2021, and United States Congress, Senate, *Report of the Joint Special Committee, Appointed Under Joint Resolution of March 3, 1865 with an Appendix*, 39th Cong., 2d sess, 1867. https://digitalcommons.law.ou.edu/cgi/viewcontent.cgi?article=2746&context=indianserialset. Accessed January 11, 2022. Doolittle provides a lengthy report in this document, but there are references to the Sand Creek Massacre on pages 5–6 and in the Appendix entitled "The Chivington Massacre" on pages 26–98. Kerry R. Oman, "The Beginning of the End: The Indian Peace Commission of 1867–1868," *Great Plains Quarterly* 22, no. 1 (Winter 2002): 35–36.

[49] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

[50] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000; Douglas D. Scott, Anne Wainstein Bond, Richard Ellis, and William B. Lees, *Archeological Reconnaissance of Two Possible Sites of the Sand Creek Massacre of 1864*, 1998.

[51] Richard F. Carrillo, *An Archaeological Monitoring Project at Sand Creek Massacre National Historic Site (5KW28) Kiowa County, Colorado (La* Junta, CO: Cuartelejo HP Associates Inc., 2007); National Park Service, Intermountain Cultural Resources Management Archeology Program, *Archeological Investigations at Sand Creek Massacre National Historic Site October 12–13, 2005,* by Cynthia L. Herhahn and Janet D. Orcutt, 2015, 5.

[52] Michelle A. Slaughter, *Archaeological Monitoring for Tornado Shelter Installation, Sand Creek Massacre National Historic Site (5KW28), Kiowa County, Colorado*, 2009.

intensive pedestrian survey for a controlled burn[53] (although the burn action was not completed), a metal detector survey of the potential "Big Head Site"[54] (testing of a historic trash dump that was determined ineligible for the national register)[55] and survey and trenching to bury aboveground powerlines.[56] An additional metal detector survey was conducted along the length of the Bluff Trail prior to implementing further development of the area.[57]

At the time of the *State of the Park Report* (2017), there were six known archeological sites within the site boundary and all of them had complete state site forms and adequate national register documentation including a determination of eligibility, although only one is actually listed in the national register. All the sites had complete data entered into the NPS Archeological Sites Management Information System (ASMIS).[58] The *State of the Park Report* notes that archeological resources are in good condition. Approximately 30 percent of the site had been surveyed using metal detectors, and pedestrian surveys had been conducted for every undertaking within the site boundaries. Intensive surveys related to undertakings for the purposes of compliance with Section 106 cover approximately 10 percent of the site. Future survey and testing would be done to answer specific research questions or in association with specific federal undertakings under Section 106. All archeology was noted as being completed with tribal participation and consultation. The site, however, still needed important baseline documents: an Archeological Overview and Assessment as well as an Identification and Evaluation Study.[59]

Although most of the archeological resources at the site relate to the 1864 massacre, subsequent habitation and use of the area is also present in the archeological record. One of these sites includes the Thompson-Bohart/Dawson Family Line Camp Site, situated on a very low rise on the floodplain approximately 0.5 mile northeast of the 1950 historic marker on Monument Hill. The site consists of concrete foundations, railroad ties, wood, barbed wire, and historic trash all dating after 1900 and measures 127 meters (NW-SE) by

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[53] Richard F. Carrillo, *Class III Archaeological Survey of Proposed Burn Area at Sand Creek Massacre National Historic Site (5KW28), Kiowa County, Colorado*, 2009.

[54] Kenneth P. Cannon, Johnathan Peart, Jeff C. Campbell, Charles Haecker, and Joseph Lamb, *Results of Archeological Metal Detection Sample Survey within Sand Creek Massacre NHS: Identification of the Big Head Site.* USU Archeological Services, Inc., 2012.

[55] Michael D. Troyer and Jason M. LaBelle, *Testing and Assessment of Archeological Sites at Bent's Old Fort and Sand Creek Massacre National Historic Sites*, The Center for Mountain and Plains Archaeology, Colorado State University, 2012.

[56] Richard F. Carrillo, *A Class III Survey of Proposed Locales of Proposed Underground Electrical Utility Placement, Sand Creek Massacre National Historic Site (5KW28), Kiowa County, Colorado*, 2012; Richard F. Carrillo and Michelle A. Slaughter, *Archaeological Monitoring during Underground Electrical Utility Placement, Sand Creek Massacre National Historic Site, Kiowa County, Colorado*, 2014.

[57] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 110–111, 136–137.

[58] National Park Service, *State of the Park Report,* 2017, 21.

[59] National Park Service, *State of the Park Report,* 2017, 20.

40 meters (NE-SW). The Chivington Canal defines the northeast boundary of the site. The line camp site was recommended as eligible for the NRHP with a local or state level of significance. The Chivington Canal (5KW122.1) was revaluated for its NRHP eligibility as an archeological site and determined the condition to be good with light to moderate disturbance.[60] The Chivington Canal is additionally included on the site's Historic Structures Inventory (HS-01, CRIS#652944).[61] As resources eligible for the national register, and one resource listed on the site's Historic Structures Inventory, site managers must consider these resources in planning and compliance activities even though they are not related to the events of 1864.

Early archeological investigations at the site have largely been composed of surface surveys and limited testing so as not to disturb human remains and natural resources.[62] These trends in survey and limited tested have continued through the period from 2007 to 2017, allowing for objects associated with the massacre to remain in situ and undisturbed to the greatest extent possible. This limitation on types of archeological survey is another example of how park staff seek to show respect for the victims of the massacre who remain at the site. Furthermore, site staff and visitors are prohibited from picking up objects on the surface or disturbing the soil and ground surface in any manner. Surface objects are to be left in situ and their location documented.[63]

Museum Collection Management

A museum collection is a group of artifacts (including archives) and/or scientific specimens that are relevant to a site's mission, mandates, history, and themes, and that the site manages, preserves, and makes available for access (though research, exhibits, and other media) for the public benefit.[64] The museum collection associated with Sand Creek Massacre NHS is not located on site or in the administrative office space in the Murdock Building in Eads. Instead, the museum collection is stored in Tucson, Arizona, at the Western Archeological and Conservation Center (WACC), a professionally staffed repository for the preservation and study of museum collections in the Intermountain Region of the National Park Service and Bent's Old Fort National Historic Site, which was

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[60] Jacqui Ainley-Conley, *Final Report: Dawson Ranch Building Complex Survey.* National Park Service, 2005, 18–21, 24–25; Cynthia Herhahn, "Memorandum: Trip Report for Shovel Tests and Site Recording at Sand Creek Massacre National Historic Site, October 11–14, 2005*"* in Cannon, *Plan for Repatriation Site Management at Sand Creek Massacre National Historic Site*, 27–29.

[61] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement,* 2011, 9. In 2019, the List of Classified Structures was incorporated into an integrated database called the Cultural Resources Inventory System (CRIS).

[62] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000.

[63] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement*, 2011, 14.

[64] National Park Service Museum Management Program, *The Museum Handbook Part 1: Museum Collections*, https://www.nps.gov/museum/publications/mhi/mhi.pdf, 2023.

designated as a multi-park museum facility in the 2016 Intermountain Region Museum Facilities Plan.[65] This designation and history of administrative relationships has allowed Bent's Old Fort to have a GS-11 curator on staff to support the curatorial care of objects from Sand Creek Massacre NHS. In 2016, Bent's Old Fort's curatorial responsibilities were limited to the three NPS units in the High Plains Group (Bent's Old Fort, Sand Creek Massacre National Historic Site, and Capulin Volcano National Monument). In the management development of Sand Creek Massacre NHS, there has never been a plan for a permanent curatorial space separate from Bent's Old Fort NHS. The curatorial support provided by the staff and facilities at Bent's Old Fort NHS has enabled Sand Creek Massacre NHS to maintain its commitment to limited development at the massacre site, as outlined in the enabling legislation, reiterated in desired conditions included in the *General Management Plan*, and expressed by the tribal governments.[66]

The curatorial space at Bent's Old Fort NHS serves as neutral space for all four tribal governments and for objects and human remains related to the Sand Creek massacre. For these objects and human remains from the massacre site, the NPS takes physical but not intellectual custody of them.[67] The reason for this is due to the Indian Trust property at the site. The 2011 Scope of Collection Statement notes that the "ownership" of or title to archeological artifacts that may be recovered in the future from Indian Trust property within the site ultimately belongs to the Cheyenne and Arapaho Tribes of Oklahoma. While the Scope of Collection Statement notes that this question had been submitted to the solicitor's office and an opinion or other clarification will be forthcoming.[68] The 2007 solicitor's opinion had taken a broad approach and noted that the resources from the trust lands could be considered Indian Trust Assets and that all information should be stored separated from the NPS information. The opinion, however, affirmed that the management of resources on the trust property did not need to be managed different from resources on other NPS land, though the solicitor encouraged the site to work with the tribes.[69] To do this, site staff modified the NPS's DI 10-830 Deed of Gift forms to remove language that the NPS has taken ownership, to recognize the distinction of physical and intellectual custody, and to allow for the tribes to take joint ownership of the objects and human remains. The

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[65] National Park Service, "Western Archeological and Conservation Center," August 8, 2016, https://www.nps.gov/orgs/1260/index.htm; see the "Remarks" column in the Sand Creek Massacre National Historic Site Accession Ledger for location of accessions, 3–6; National Park Service Intermountain Region Museum Services Program, *Intermountain Region Museum Facility Management Plan*, 2016. Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; see the "Remarks" column in the Sand Creek Massacre National Historic Site Accession Ledger for location of accessions, 3–6.

[66] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[67] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[68] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement*, 2011, 8.

[69] Robert Comer, letter to Alexa Roberts, January 4, 2007, SAND Electronic Records.

changes to the Deed of Gift form were reviewed by David Halaas, a consultant to the Northern Cheyenne Sand Creek Massacre representatives (and former Colorado state historian) to ensure its equitability and legal authority.[70]

All four tribal governments are represented on the Deed of Gift form, and all tribal representatives have to sign and agree to the joint ownership. By Bent's Old Fort NHS's curatorial space acting as neutral ground, this allows for the care of the Sand Creek massacre objects and human remains while the tribal governments discuss ownership, access, and actions that should be taken regarding the objects and human remains. As these discussions are tribal government-to-government discussion, the NPS and site staff do not enter these discussions in order to respect tribal autonomy and self-determination. How the site cares for these objects and human remains and how the site engages in the tribal relationship is different than how the regional office advises for the care and relationship. The tribes, furthermore, support the curatorial care of Sand Creek massacre related objects and human remains at Bent's Old Fort as the ancestors and objects remain in their traditional territory.[71]

The interconnected relationship between Bent's Old Fort NHS and Sand Creek Massacre NHS, and the Cheyenne and Arapaho Tribes' designation of their official representatives according to the cooperative agreements between the NPS and the tribes, has caused some confusion for new site staff and tribal leaders. Sand Creek Massacre NHS staff, including the shared curator from Bent's Old Fort NHS, engage with the officially designated tribal representatives, which can change. Site staff engage with the officially designated tribal representatives instead of the tribal historic preservation officers (THPO) because of the responsibilities outlined in the cooperative agreement.[72]

As of 2007, all collections from the Site Location Study had been cataloged, entered into the NPS museum management (ANCS+) database, and stored at WACC or BEOL.[73] In 2017, the site's accession ledger recorded 29 total museum accessions, with accessions SAND-00005 through SAND-00029 acquired during the period from 2007 to 2017. These accessions consisted of ancestors' remains, ethnographic objects, natural history and biological specimens, genealogy research materials, artifacts, archival records (such as photographs, reports, film, and oral histories), site development and commemorative items, and paintings.[74] The oral histories contained within these early accessions

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[70] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021. For an example of the NPS's DI 10-830 Deed of Gift form (without SAND's modifications), see https://www.nps.gov/badl/getinvolved/upload/BlankDeedofGift.pdf (accessed February 27, 2024).

[71] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[72] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[73] National Park Service, *Sand Creek Massacre Project, Volume 1: Site Location Study*, 2000; Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Sand Creek Massacre National Historic Site Accession Ledger, 3–6.

[74] Sand Creek Massacre National Historic Site Accession Ledger, 3–6.

(SAND-00001 through SAND-00006) have differing copyright agreements depending on the tribe.[75] SAND-00006 furthermore discusses the copyrighted material and includes a finding aid for the site's legislative establishment records from 2001 to 2007.[76] The ancestors' remains were recorded as incoming loans from the Cheyenne and Arapaho Tribes and the records updated upon burial at Sand Creek Massacre NHS.[77] The paintings recorded in the accession ledger included paintings on loan from the tribes and the commissioned paintings located in the meeting room in the on-site maintenance building. The paintings in the meeting room were commissioned by the NPS by tribal artists and belong to the NPS.[78]

While the relationship with the Cheyenne and Arapaho Tribes directs much of the curatorial care of objects and human remains, NPS policy and site management plans also guide acquisition and care. While the tribes have requested that some objects go into collections storage at Bent's Old Fort, the site is limited as to what it may acquire due to Sand Creek's enabling legislation and the site's 2011 scope of collection statement (SOCS). A scope of collection statement is a stand-alone document that states the significance of the museum collection and sets limits on the contents based on the site's purpose and interpretive objectives as enunciated in legislation, other mandates, and site-specific planning documents. It is designed to ensure that the present and future museum collection is clearly relevant to the site, and it serves to prevent arbitrary, unnecessary, and excessive growth of the museum collection while preserving the unique values associated with Sand Creek Massacre NHS. The site's scope of collection statement mentions the site's enabling legislation, subsequent agreements with the Cheyenne and Arapaho Tribes, Indian Trust property, and consultation with the tribes and State of Colorado.[79]

On May 4, 2010, the NPS held a consultation meeting at the site with tribal representatives in order to develop the scope of collections statement. The statement mentions visitors leaving commemorative items and offerings at the site, and the development of policies with tribal representatives to ensure that few, if any, commemorative items or offerings become part of the museum collection. The SOCS also mentions previous discussions indicating moving the 1950 marker into the collections. The statement further notes that no cultural artifacts from the area designated as Indian Trust property (specifically the former Dawson Ranch) have been included in the site's museum collection. There is, however, a collection of more than 500 artifacts that were excavated on the property in

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[75] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement*, 2011, 21.

[76] National Park Service, Sand Creek Massacre National Historic Site: SAND Legislative Establishment Records, 2001–2007, Finding Aid. National Park Service Intermountain Region, Museum Services Program.

[77] Sand Creek Massacre National Historic Site Accession Ledger, 3–4.

[78] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Sand Creek Massacre National Historic Site Accession Ledger, 3–6.

[79] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement*, 2011.

September 2002, before the land was purchased and placed in trust. The Dawsons donated those artifacts to the NPS, and they were accessioned in December 2002; the collection is now held in trust for the Cheyenne and Arapaho Tribes of Oklahoma.[80] The SOCS notes that some objects and archives were un-accessioned and un-cataloged within the scope of collections summary, and overall, the museum collection was considered to be in an early development stage. It also mentions that, while archeological objects recovered in the future from the Indian Trust property would likely be included in the site's museum collection, the ownership would remain with the Cheyenne and Arapaho Tribes of Oklahoma.[81]

Offers for donations to the curatorial collections from the tribes or private citizens are weighed against the enabling legislation and the scope of collections. Until a Collections Advisory Committee was finalized in 2020–2021 (outside of the scope of this report), these decisions were made by the Superintendent as the Accountable Property Officer, based on the recommendation of the Custodial Property Officer (usually the Curator, when that position was filled). Other individuals, including tribal representatives, park staff including BEOL staff, and subject-matter experts also weighed in on the appropriateness of accepting a donation, but the ultimate decision resided with the Superintendent. This process was consistent with NPS property rules and documented using the standard NPS Deed of Gift and Accession Process, as guided by the NPS Museum Handbook.

Collection Management Reports

Site managers have submitted Collection Management Reports (CMRs) for each year included in this administrative history volume. Collection Management Reports are annual reports that provide information on the size of a site's museum collection and collection activity in a fiscal year and tracks accessions, deaccessions, cataloging, and use of collections.[82] Copies of the site's CMRs can be accessed on the Sharepoint site NPS-WASO-Museum Resource Portal-Collection Management Reports. In 2007, the museum collection was comprised of 53,817 objects, with the majority of the objects consisting of archival material and 95.91 percent of the entire collection having been cataloged. There were two outgoing loans, which were comprised of 47,294 objects. No objects were on exhibit. There had been two research requests, one from within the site and one from outside of the site.

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[80] This accession is SAND-00003, "Site Location study archaeological collection – Dawson property," housed at the Western Archaeological and Conservation Center in Tucson, Arizona.

[81] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement*, 2011, 8.

[82] National Park Service, "Appendix H: The Collections Management Report," in *ICMS User Manual* (2015), H:1. https://www.nps.gov/museum/publications/ICMSmanual/27-AppH-CMR.pdf. Accessed September 20, 2021.

The collection experienced moderate growth, with a noticeable increase in total collections (74,087) and backlog collections (22,473) in 2010. The largest number of research requests outside of the site came in 2011 (10 requests). During 2012, the total museum collections again significantly increased (115,054), and there had been a record number of 30 research requests from within the site. By 2017, the Collection Management Report identified a museum collection consisting of 103,071 objects, with the majority of the objects consisting of archival material and 88.74 percent of the total collection having been cataloged. There were two outgoing loans, which were comprised of 93,046 objects. There was one exhibit comprised of three objects on exhibit, and four total research requests for 2017, two from within the site and two from outside of the site.[83]

Native American Graves Protection and Repatriation Act (NAGPRA)

The enabling legislation indicates that any items associated with the Sand Creek massacre such as Native American human remains, associated funerary objects, unassociated funerary objects, sacred objects, and objects of cultural patrimony, are acceptable for repatriation under the Native American Graves Protection and Repatriation Act (NAGPRA) (25 USC 300 et seq.) or any other provision of law for interment, reinterment, preservation, or other protection.[84] Considering the unique nature of the site, the prioritization of tribal rights regarding the custody of objects and human remains, and the importance of tribal consultation in site management, there are distinct ways in which the site fulfills its responsibilities.[85]

The site does not accept human remains or known funerary objects but will temporarily hold human remains and objects for the tribes while they decide the appropriate course of care and action. Because the site does not take custody, the site does not engage in NAGPRA activities. Therefore, if private individuals wish to return human remains or funerary objects to the site, they must instead directly give the remains or objects to the tribes. If the site is temporarily caring for an object, the object is treated as a funerary object unless the tribes indicate that the object is not funerary in nature. As a massacre site, it is often not known if the objects belong to a victim who died in the massacre or survivor of the massacre, and additionally, parts of the massacre victims' bodies and other objects associated with the massacre were taken away as trophies.[86] As understood from tribal memory, the bodies of the victims remained unburied, and other accounts note the presence of bones

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[83] National Park Service, "WASO Museum Resource Portal-Collections Management Reports," https://doimspp.sharepoint.com/sites/nps-museum-mgmt-program/CollectionsManagementReports.

[84] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[85] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[86] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

(though no distinction was made between human or animal remains) on the ground surface. When Sherman arrived in 1868, his troops collected some human remains and objects, but earlier collection of human remains may have occurred as well. Over time, some of the human remains which were taken as trophies, and some of the human remains collected by the United States Army, have been traced to the Colorado Historical Society and the Smithsonian Institution. Other human remains from the massacre have been lost over time.[87]

Since some bodies of the victims remained exposed to the elements at the massacre site, and parts of bodies were taken away as trophies or souvenirs, the tribes consider interment in the repatriation area as the first burial, not a reburial. The enabling legislation allows for these burials of human remains and objects with a clear connection to the massacre and the massacre descendants in the site's repatriation area.[88] No additional waivers are needed. However, human remains or objects without a clear association to the massacre or descendants are not included.[89]

Special Care and Handling

Tribal leaders direct the care of human remains and objects, with the tribe indicating that some items should be wrapped in muslin and kept separate from the rest of the museum objects while other items may be held in regular museum storage conditions. Additionally, the tribes have given certain site staff permission to handle and care for the human remains and objects. This permission is currently limited to the curator and a museum technician. While the tribes direct care, federal dollars are sometimes spent on the care of tribal artifacts. There are no designated federal funds for conservation, however.[90]

When the tribes take legal custody of human remains or objects, ceremonies accompany this action. Similarly, if human remains or an object needs to be moved on site, the tribe conducts a ceremony. Bent's Old Fort NHS maintains an area for these ceremonies for human remains and objects outside of the curatorial storage area when the ceremonies involve fire or smudging for safety concerns and to protect the other objects in curatorial storage. Some ceremonies are allowed to take place in the curatorial storage area.[91]

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[87] Jeff C. Campbell, Sand Creek Massacre National Historic Site: Historic Interpreter's Packet, National Park Service, 2008, 11.

[88] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[89] Karen Wilde and Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[90] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[91] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Use of Objects for Ceremony or Research

The 2011 scope of collection statement provides direction on the use of objects for ceremony and research. The museum collections may be used for exhibits, interpretive programs, research, publications, or other interpretive media. Primary considerations for the use of museum objects are the preservation of the object or the collection as a whole, culturally appropriate uses, and accurate interpretation. The SOCS outlines appropriate uses of the collections including consultation with the tribes and restrictions to use.[92]

Historic Structures

The site has two structures that are on the Historic Structures Inventory: the Chivington Canal (HS-01, CRIS #652944) and the 1950 marker on Monument Hill (HS-02, CRIS #660870).[93] The Chivington Canal is an earthen ditch that runs along the east side of Sand Creek. It was built in 1909 by the Chivington Canal Company, and was determined eligible for the National Register of Historic Places for its potential to yield information related to irrigation practices in Colorado in early in the last century. The 1950 marker on Monument Hill was determined not eligible for the National Register of Historic Places but is managed as a cultural resource. Otherwise, the site has no historic structures. All structures on site are modern NPS administration facilities.[94]

New Cultural Resource Research

The extensive research about the Sand Creek Massacre has been detailed in many reports leading to the establishment of the National Historic Site in 2000, in the site's listing in the National Register of Historic Places in 2001, and in subsequent research and planning since the site's establishment. Much of this research took place prior to the dedication of the site in 2007; however, research continues. This section focuses on research conducted from 2007 to 2017 and the influence that this research has had on the management of cultural resources and interpretation.[95]

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[92] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement*, 2011.

[93] National Park Service, *Sand Creek Massacre National Historic Site: Scope of Collection Statement*, 2011, 1.

[94] National Park Service, *State of the Park Report,* 2017, 26.

[95] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 52–55. National Park Service, *State of the Park Report*, 2017, 26–28; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7-17 and 7-19 maps showing the hypothesized routes of Chivington's troops and pages 8-35 to 8-36 for the route narrative. This hypothesis has been updated due to subsequent research.

Massacre Location. The National Park Service and independent researchers have conducted extensive research about the Sand Creek Massacre.[96] One such study, a locational study initiated through the efforts of US Senator Ben Nighthorse in the late 1990s, was a multi-disciplinary effort to identify the location of the attack and massacre. The resulting report from 2000—Sand Creek Massacre Project, Volume One: Site Location Study—accommodated multiple perspectives on the location of the massacre including archeology, archival research, aerial photography analysis, geomorphology, oral histories from landowners, local collectors and tribal descendants, and tribal traditional methods to locate the massacre site. This research concentrated on evidence related to Big Sandy Creek and its tributaries, troop travel, trails, camps, and other evidence of the location of the attack and massacre.[97]

Researchers began identifying 1860s-era artifact concentrations soon after remote sensing began as part of the site location study. However, the location of these artifact clusters, especially the cluster interpreted as marking the Cheyenne and Arapaho village, did not correspond neatly with the historic documentation or tribal histories of the massacre site. Extrapolating from the proposed location of the village site, other elements of the attack and the aftermath were identified with relatively high confidence as predicted by archival sources. While all parties in the study agreed on the exterior boundaries of the entire massacre site, interpretations differed about the location of the village, the routes of military approach, and the sand pits.[98]

One of the main differences in interpretation was the differences in credibility each group gave to particular historic maps, particularly the maps created by George Bent—a half-Cheyenne survivor of the attack, created between 1904 and 1915—and a previously unknown military map created by Lt. Samuel Bonsall in 1868, which was discovered during the course of the site location study. The Bent maps were considered by the NPS as generally correct, though not to scale, and the Bonsall map was considered highly reliable due to the nearness in creation to the attack and the use of standardized "strip map and journal" methodology at the time the map was created. To many Cheyenne people, however, the credibility of the Bonsall map over the Bent maps implied a disregard of Cheyenne ethics, tribal law, and accuracy in memory and oral history.[99]

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[96] National Park Service, *State of the Park Report,* 2017, 26–28; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, summarizes the site location studies in her nomination. Of particular interest is the narrative on pages 7-3 to 7-21, 7-17 and 7-19 maps showing the hypothesized routes of Chivington's troops, and pages 8-35 to 8-36 for the route narrative. This hypothesis has been updated due to subsequent research.

[97] Alexa Roberts, "Multiple Lines of Evidence: Searching for the Sand Creek Massacre Site," August 20, 2018, https://www.nps.gov/articles/searching-for-sand-creek.htm.

[98] Alexa Roberts, "Multiple Lines of Evidence: Searching for the Sand Creek Massacre Site," August 20, 2018, https://www.nps.gov/articles/searching-for-sand-creek.htm.

[99] Alexa Roberts, "Multiple Lines of Evidence: Searching for the Sand Creek Massacre Site," August 20, 2018, https://www.nps.gov/articles/searching-for-sand-creek.htm.

Other factors contributing to the conclusions about the location of the village included a 1978 visit to the massacre site by the Southern Cheyenne Keeper of the Sacred Arrows, the tribe's highest spiritual authority. Based on his ceremonial knowledge, the Keeper consecrated the ground within the bend in the creek as Cheyenne Earth, thereby indisputably identifying the spot for tribal participants that many descendants have always known to be the massacre site. Additionally, for many tribal members, confirmation of the massacre site comes from a spiritual presence, often experienced as the voices, footsteps, or transient embodiment of women and children; or from proof of the efficacy of prayers as evidenced by birds, eagles, badgers, and other animals. Other ceremonial methods for identifying places where ancestors were killed, prayers conducted by descendants for ancestors, and descendants blessing the site also contribute to understanding the significance of the site and caring for it and the ancestors' spirits.[100]

Research from 2007 to 2017 by subject-matter experts (described in greater detail in Chapter Three) uncovered new evidence that triggered changes to cultural resources management and interpretation, including the understanding of how the troops traveled to Big Sandy Creek just prior to the attack.[101] As a result of recent research, the troops are no longer believed to have approached over the Monument Hill area, as was hypothesized in the 2000 Site Location Study. Instead, the troops are now thought to have traveled through Section 36.[102] The pullout and interpretive waysides associated with this new research are described in Chapter Six.

Natural Resource Management

Natural resources are composed of inherently complex organisms, processes, and systems. NPS policies regarding natural resource management emphasize the need to manage natural resources and values in a systematic, consistent, and professional manner. These resources and values include ecosystems and their component plants, animals, water, air, soils, topographic features, geologic features, paleontological resources, and aesthetic values, such as scenic vistas, natural quiet, and clear night skies. Natural processes and systems are dynamic, are often beyond immediate human control, and are affected by activities both in and outside of NPS units. Comprehension of these processes and systems is far from complete, yet the National Park Service is still responsible for management and protection. The

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[100] Alexa Roberts, "Multiple Lines of Evidence: Searching for the Sand Creek Massacre Site," August 20, 2018, https://www.nps.gov/articles/searching-for-sand-creek.htm.

[101] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 52–55. National Park Service, *State of the Park Report*, 2017, 20–30; Holtman, *National Register of Historic Places Nomination: Sand Creek Massacre Site*, 7-17 and 7-19 maps showing the hypothesized routes of Chivington's troops and pages 8-35 to 8-36 for the route narrative. This hypothesis has been updated due to subsequent research.

[102] Cynthia Wiley, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

fundamental objectives of NPS natural resource management, as prescribed in policy, are to manage the natural resources of the national park system to maintain, restore, and perpetuate their inherent integrity and, when consistent with the foregoing, to provide opportunities for visitors to benefit from and enjoy natural environments, which are evolving through natural processes minimally influenced by human action.[103]

Sand Creek Massacre National Historic Site has worked closely with other NPS units to share resources and information about natural resource management. The historic site is one of 11 NPS units in the Southern Plains Inventory and Monitoring (I & M) Network. SAND is one of 11 NPS units in this specific network. Reports written by the Southern Plains I & M Network between 2007 and 2017 helped SAND site managers better understand their natural resources and make sound, science-based management decisions. The site also works with other parks in the I & M network on resource management projects. Lake Meredith National Recreation Area, for example, supports SAND with implementation of the site's fire management plan.[104]

Landscape Restoration Planning

As discussed above, at Sand Creek Massacre National Historic Site, the management of natural resources and cultural resources go hand-in-hand. Experiencing the natural landscape is important for visitor understanding and opportunities to reflect on the historic events that took place there. Staff's natural resources management activities between 2007 and 2017 sought to accomplish directives from the enabling legislation to protect and preserve "topographic features" and "as closely as practicable, the cultural landscape of the site as it appeared at the time of the Sand Creek Massacre," as well as "to interpret the natural and cultural resource values associated with the site."[105] Reports, surveys, plans and studies inform park managers about the site. Several projects were completed prior to site's establishment, while others occurred during the period of 2007–2017. For example, some natural resource studies and reports that were generated to guide vegetation management include vegetation classification and mapping,[106] vegetation inventory,[107] exotic plants

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[103] National Park Service, *Management Policies 2006*, 36–39, https://www.nps.gov/subjects/policy/upload/MP_2006.pdf.

[104] National Park Service, *Sand Creek Massacre National Historic Site: Resource Stewardship Strategy*, 2011, 61.

[105] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[106] Stephanie Neid, Joe E. Stevens, Kelsey Forest, and Michele Fink. 2007. *Sand Creek Massacre National Historic Site: Vegetation Classification and Mapping*. Natural Resource Technical Report NPS/SOPN/NRTR—2007/050. National Park Service, Fort Collins, CO.

[107] Roy Roath, Rachel Ridenour, Bob Wesley, and Zachary Holmes. 2008. *Vegetation Inventory. Prepared for Sand Creek Massacre National Historic Site*. Forrest, Rangeland, and Watershed Stewardship Division. Colorado State University.

resource brief,[108] and grassland and fire effects monitoring in the Southern Plains Network.[109] These reports, as well as meetings with specialists and tribal representatives, made the protection and restoration of natural resources a collaborative effort.[110]

Planning efforts between 2007 and 2017 helped to guide park managers in natural and cultural resource management. During the period, Karl Zimmermann was the site operations manager who led the natural resource efforts. A resource stewardship strategy (RSS) was completed in 2011 for Sand Creek Massacre National Historic Site. The core team included SAND staff and staff from Bent's Old Fort National Historic Site and the Denver Service Center. NPS subject-matter experts from the Inventory and Monitoring network and regional and Washington offices also contributed to this effort. The RSS presents 10- to 20-year comprehensive strategies for natural and cultural resource management aimed at achieving and maintaining desired conditions. The RSS states that "strategies include activities that investigate and acquire resource knowledge, assess and document resource condition, mitigate resource stressors, formulate plans for resource management, and develop partnerships to monitor and enhance resources."[111] Strategies are organized by resource types—e.g., geologic, scenic, natural, and cultural—and indicate timing, priority, funding source, and whether compliance is needed. The RSS is intended as a living document to be updated regularly as strategies/activities are accomplished and new activities are identified.

The *State of the Park Report: Sand Creek Massacre National Historic Site* was completed in 2017. This report, similar to the RSS, focused on priority resources and values of the site, based on its purpose and significance as identified in the 2017 *Foundation Document* and 2015 *General Management Plan*.[112] The primary goal of this effort was to assess the overall condition of the resources and values and to communicate that information, along with the stewardship actions being taken to maintain or improve those conditions, to staff, visitors, and stakeholders. The report listed the following baseline environmental monitoring as complete: "groundwater monitoring, pollen analysis, vegetation inventory, exotic plant monitoring, revegetation planning, paleontological inventory,

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[108] Tomye Folts-Zettner. *Sand Creek Massacre Exotic Plants Resource Brief* (Boulder, CO: Southern Plains Network, 2009).

[109] Tomye Folts-Zettner, Richard Gatewood, and Heidi Sosinski, *Grassland and Fire Effects Monitoring in the Southern Plains Network: Southern Plains Network and Southern Plains Fire Group Collaboration Project Report 2010 and 2011*, Natural Resource Technical Report NPS/SOPN/NRTR—2012/537, National Park Service, Fort Collins, CO, 2013; Tomye Folts-Zettner, Richard Gatewood, and Heidi Sosinski, *Sand Creek Massacre National Historic Site: Southern Plains Network and Southern Plains Fire Group, 2013 Vegetation Monitoring Data Summary,* Southern Plains Inventory and Monitoring Network; and Tomye Folts-Zettner, Richard Gatewood, and Heidi Sosinski, *Sand Creek Massacre National Historic Site: Southern Plains Network and Southern Plains Fire Group, 2014 Vegetation Monitoring Data Summary*. Southern Plains Inventory and Monitoring Network.

[110] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[111] National Park Service, *Sand Creek Massacre National Historic Site: Resource Stewardship Strategy*, 2011, 59.

[112] National Park Service, *State of the Park Report,* 2017, 1.

vertebrate inventory, rare species documentation, insect identification, native fish identification, bird monitoring, prairie dog status documentation, prairie and wetland survey, natural resource condition assessment, acoustic soundscape monitoring, air quality assessment, viewshed status assessment, riparian condition assessment, soils identification and fire management planning."[113] Other studies (some unpublished) that are related to the site include "Geomorphic assessment of Big Sand Creek,"[114] Vegetation classification and mapping,[115] and Management implications of global change for Great Plains rangelands.[116] This document also identified key issues and challenges the site faces, to inform planning and management.

Because the enabling legislation emphasizes managing the cultural landscape to its appearance in 1864, site managers have prioritized landscape restoration.[117] The site is composed of two main habitats: riparian and upland shortgrass prairie. Prior to NPS management, the area that is now the national historic site was privately owned and used mostly for agricultural operations (primarily livestock grazing). Some areas were used for growing crops that used water drawn from Sand Creek or pumped from wells.[118] After that long history of ranch use, the natural resources did not reflect a prairie landscape as would have been present in 1864. Agricultural land use practices ceased once NPS management practices were introduced.

Prairie Restoration

Grasslands are an important part of the site's natural and cultural heritage. Consultations with the Cheyenne and Arapaho Tribes have identified protection of the landscape as one of the highest natural resource priorities at the site. The region's grasslands were once home to native cultures and supported native flora and fauna—most notably, vast herds of bison (*Bison bison*), commonly known as buffalo. While Sand Creek Massacre NHS is situated in the broad category of shortgrass steppe, there is considerable variation in grasslands throughout the site. The species that characterize the archetypal shortgrass

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[113] National Park Service, *State of the Park Report,* 2017, vii.

[114] Martin, M. 2011. *Travel report – Geomorphic assessment of Big Sandy Creek, Sand Creek Massacre National Historic Site (SAND), May 18–20, 2011*. Memorandum to Super-Superintendent Alexa Roberts of Sand Creek Massacre National Historic Site. L54(2380).

[115] Stephanie Neid, Joe E. Stevens, Kelsey Forest, and Michele Fink. 2007. *Sand Creek Massacre National Historic Site: Vegetation Classification and Mapping*. Natural Resource Technical Report NPS/SOPN/NRTR—2007/050. National Park Service, Fort Collins, CO.

[116] Jack A. Morgan, Justin D. Derner, Daniel G. Milchunas, and Elise Pendall, "Management Implications of Global Change for Great Plains Rangelands," *Rangelands* (June 2008): 18–22.

[117] Sand Creek Massacre National Historic Site Establishment Act of 2000, Public Law 106-465, *U.S. Statutes at Large* 114 (2000), 2019–2023.

[118] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 148.

steppe are blue grama (*Bouteloua gracilis*) and buffalograss (*Buchloe dactyloides*).[119] As with most ecological communities, shortgrass prairie system driver patterns have changed. Early land use primarily consisted of American Indians hunting bison on the open plains. In the years following the 1864 massacre, land use of the grasslands shifted to open cattle grazing, which later gave way to stock farming and other agriculture.[120]

Restoration included mowing, invasive plant control, and reseeding. When the site was acquired, there was a large density of sand sagebrush (*Artemisia filifolia*), which results from overgrazing. While the sand sage was populous due to the cattle overgrazing, Karl Zimmermann noted that sand sage can appear if an area is overgrazed by native buffalo as well.[121] The absence of fire is also generally thought to have contributed to an increase in sand sage in the southwest grassland areas.[122] Cheatgrass (*Bromus tectorum*) and the sand burr or goatshead (*Tribulus terrestris*) are some of the more common nuisance species within the site's boundary, but Canada thistle is troublesome east of the site and leafy spurge is prevalent in Lincoln County to the northwest.[123]

A mowing regime was begun, together with spraying for invasive plant species, and over time, these efforts resulted in increased diversity of plant life. Tribes were consulted as these practices were implemented. According to Karl Zimmermann, the tribes supported these management actions, as they saw the direct benefits of mowing and spraying.[124]

Under NPS *Management Policies*, exotic species will not be allowed to displace native species if displacement can be prevented.[125] Prairie restoration efforts included the removal of nonnative, invasive vegetation—for example, the naturalized Russian olive (*Elaeagnus angustifolia*) and tamarisk trees (*Tamarix ramosissima*) that were common in portions of the site. Natural resource management actions, based on various management plans, have resulted in a significant decrease in nonnative plants (i.e., Russian thistle, koschia, sand burr, puncture vine) within the jurisdictional boundary.[126] According to Karl Zimmermann, over time the presence of these trees and other exotic species on site was dramatically reduced to less than 1 percent, with some invasive species being nearly eradicated.[127]

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[119] Stephanie Neid, Joe E. Stevens, Kelsey Forest, Michele Fink, *Sand Creek Massacre National Historic Site: Vegetation Classification and Mapping*. Natural Resource Technical Report NPS/SOPN/NRTR—2007/050, National Park Service, Fort Collins, CO, 2007, 18.

[120] National Park Service, *State of the Park Report,* 2017, 10.

[121] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[122] National Park Service, *State of the Park Report,* 2017, 10.

[123] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 17.

[124] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[125] National Park Service, *Management Policies 2006*, 47.

[126] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 17.

[127] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

Over time, prairie restoration efforts resulted in improved resource conditions. As stated in the 2017 *Foundation Document*, the intact short-grass prairie ecosystem now closely resembles the appearance of the 1864 landscape, including the open views and vistas, ridgelines, riparian areas, and other topographical features. In addition, the remote location of the historic site allows for a similar night sky, natural sounds, and feeling of solitude that would have existed at the time of the massacre, providing for both cultural and natural continuity from 1864 to the present. For Karl Zimmermann's achievements in developing a natural resource management program at Sand Creek Massacre NHS, he was awarded the Trish Patterson Student Conservation Association Award for Natural Resource Management in a Small Park in 2016.[128] Zimmermann collaborated with tribes, partners, and specialists, ultimately transforming 2,500 acres of former ranchland into a premier example of mixed-grass prairie on the southern plains. Zimmermann used innovation and creativity to tackle delicate problems. The public awards ceremony took place at the Department of the Interior Stewart Lee Udall Main Interior Building in Washington, DC, on September 19, 2018.[129]

Figure 19: Durwood Miller seeding grass as part of the prairie restoration efforts at Sand Creek Massacre National Historic Site, 2023.
Photo by Tim Jobe, 2023. Courtesy of the National Park Service, Sand Creek Massacre National Historic Site.

[128] National Park Service, "Director's Awards for Natural and Cultural Resources," 2021, https://www.nps.gov/articles/000/director-s-awards.htm. Updated June 28, 2023. Accessed October 12, 2023; Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[129] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021; Eli Conner "Sand Creek Massacre NHS Employee Recognized with Prestigious Award." *Kiowa County Independent*. November 21, 2018. https://kiowacountyindependent.com/news/1411-sand-creek-massacre-nhs-employee-recognized-with-prestigious-award. Accessed June 10, 2021.

Riparian Restoration

The plains cottonwood trees (*Populus deltoides*), found in even-aged groves close to current or historic seasonal stream traces of Big Sandy Creek, are important to the associated tribes. At the time of the massacre, cottonwood saplings may have been present based on the account of Sherman, who arrived in the area in 1868. Some grown cottonwood trees, located at the high flood line of the creek, may be period or witness trees to the massacre.[130] The cultural significance of these cottonwood trees is discussed above under the heading "Sensitive Resource Area."

Nonnative plants are found in Kiowa County and throughout southeastern Colorado but reportedly are not a large problem along Big Sandy Creek within the boundaries of the site.[131] One of the site's major restoration efforts involved removing fuel loads from the riparian zone of Big Sandy Creek. The fuel load to be removed consisted of dead plains cottonwood trees, large branches, and other flood debris which became piled up against living plains cottonwood trees during 1997 and 2007 flooding events. The removal of the fuel load would have interdisciplinary benefits such as removing wildfire danger to the cultural and natural resources, protecting the cultural viewshed for visitors, strengthening the site's relationship with the Cheyenne and Arapaho Tribes, and meeting the enabling legislation goals to protect and preserve the site including the cultural landscape as closely as practicable to the cultural landscape as it appeared at the time of the massacre.[132] In 2008, Karl Zimmermann submitted PMIS #142946, which stated, "The consensus at both consultations focused on the protection of the riparian zone and the reduction of the flood debris as a primary concern. From both a weed control perspective, native plant community health and fire hazard reduction this is the primary natural resource issue at the park." In fiscal year 2012, tribal fire crews and fire crews from Lake Meredith National Recreation Area assisted with the fuel load reduction. According to Karl Zimmermann, lessons learned at SAND were applied in fuel reduction projects in other NPS units.[133]

While the primary goal of this project was to address hazardous fuel loads, it had the added benefit of strengthening relationships with tribes and the site's neighbors. The piles of flood debris, having been pushed downstream, had previously washed out the boundary as well as the site's and neighbors' fencing. Improving relationships with the neighbors with these mutually beneficial projects have overall helped with the natural and cultural preservation efforts. In fiscal year 2012, the project employed 10 people for 2 weeks from the Northern Cheyenne and the Southern Cheyenne fire crews. Additionally,

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[130] Alexa Roberts, Karen Wilde, and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

[131] National Park Service, *Interim Site Management Plan/Environmental Assessment*, 2006, 17.

[132] National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #142946.

[133] Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

once removed from the riparian area, logs and other fuels were used by the tribes during special events or by local residents for firewood. The PMIS completion report noted that "Projects of this type must have tribal participation to be started and completed." Based on the success of this project, additional funding was sought and obtained for fiscal year 2013, and fire crews from the Cheyenne and Arapaho Tribes completed the fuel reduction project.[134] This fuels reduction effort is also discussed in Chapter Three on the relationships with tribes.

Endangered Species

Although small, Sand Creek Massacre National Historic Site may serve as a refuge for wildlife, providing long-term beneficial effects to wildlife. Twenty species that are listed as federal or state special status or candidate species have been detected at Sand Creek Massacre National Historic Site. The Endangered Species Act requires designation of "critical habitat" for listed species when it is judged to be prudent and determinable. Critical habitat includes geographic areas that contain the physical or biological features essential to the conservation of the species and that may need special management or protection. In 2014, the US Fish and Wildlife Service listed the lesser prairie-chicken as threatened under the Endangered Species Act of 1973. While the lesser prairie-chicken is not currently present on site, most of the Sand Creek Massacre National Historic Site is considered excellent habitat (classified as F1 crucial habitat) for the species and two leks (breeding areas) were occupied in 2003 near the southeast boundary of the park. SAND staff has implemented several resource management treatments that have benefitted soil resources. One in particular was a brush management treatment in which a small area of the site was mechanically mowed—this decreased the sand sage canopy, increased the herbaceous cover, and decreased the amount of bare ground, reducing the potential for soil erosion.[135]

Sense of Place and External Concerns

The quiet, contemplative atmosphere at Sand Creek Massacre National Historic Site allows visitors, descendants, and others to connect to the sense of place and to the tragic events that occurred there. Expansive views are largely undeveloped, resembling the appearance of the landscape in 1864. Views and vistas are currently in good condition, based on several viewshed analyses.[136] However, potential development on nearby private property could

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[134] Alexa Roberts, interview with Denver Service Center, Eads, CO, May 18–19, 2021; National Park Service, PMIS Portal (Project Management Information System) 2021 Project Search #142946.

[135] National Park Service*, Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 27–29, 113–114.

[136] National Park Service, *State of the Park Report,* 2017, vi, 34.

infringe upon these open views, disrupting the sense of place and diminishing visitor experience. NPS-led interpretive walks and talks encourage visitors to connect to the place and often highlight the open views and vistas.[137]

Acoustical monitoring began in 2009 and a final report came out in 2011.[138] The State of the Parks Report lists the condition as "good" and "unchanging" for the indicator of "solitude, quietness, and remoteness."[139] The 2011 RSS reports the soundscape as being "reasonably intact."[140] Studies reveal that noise is audible in the national historic site between 33 percent and 36 percent of the time in both winter and summer. The most common source of noise was private aircraft and military flights. Natural sources of sound in the site included wind in vegetation, birds, coyotes, frogs, and insects (e.g., crickets).[141] In 2011 the RSS identified an activity to "develop and implement a soundscape management plan" as a medium priority under "intangible spiritual qualities of the landscape (sense of place)."[142]

Site managers identified overhead noise from privately owned aircraft as an issue for cultural landscape protection. Noise from small private planes, as well as military flights, disrupts opportunities for contemplation and for experiencing the landscape as it would have felt in 1864. Site managers have therefore sought to lessen auditory intrusions.

Sand Creek Massacre NHS is in the Cheyenne military operations area. In 2012, the 140th Wing of the Colorado National Guard consulted with the Cheyenne and Arapaho Tribes, NPS, and State of Colorado regarding an environmental assessment associated with a modification of the military operations area. From this consultation, the 140th Wing agreed to maintain a radius buffer of 5 nautical miles around the center of the site. The

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[137] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 23.

[138] Emma Lynch, *Final Acoustical Monitoring Report. Sand Creek Massacre National Historic Site* (Natural Resource Stewardship and Science: Fort Collins, CO, 2011).

[139] National Park Service, *State of the Park Report,* 2017, 34.

[140] National Park Service, *Sand Creek Massacre National Historic Site: Resource Stewardship Strategy*, 2011, 46.

[141] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 120.

[142] National Park Service, *Sand Creek Massacre National Historic Site: Resource Stewardship Strategy*, 2011, 66.

flight floor was raised to 5,000 feet above ground level. They also agreed to ensure that flights over the site would not be armed and agreed to accommodate a stand-down of flights during ceremonies with advance notice.[143]

Sand Creek Massacre National Historic Site lies on an oil and gas play (positive investment) known as the Las Animas Arch. Several wells have been drilled, produced, and eventually capped in what is now Sand Creek Massacre National Historic Site. The Atoka and Cherokee shales in Kiowa County and neighboring counties are geologically less attractive but have sparked leasing interest; improving economics and technologies could make the shale plays in the area viable. Subsurface mineral rights on portions of the national historic site are currently held by individual landowners. Private mineral ownership and a possibility that undeveloped oil and gas resources occur beneath the national historic site create the potential for additional drilling inside the national historic site. Drilling outside the park unit has occurred in the recent past and may continue in the future. Potential impacts on cultural and natural resources from drilling and production activities adjacent to the national historic site likely would consist of visual, sound, light, and air pollution impacts on the cultural and natural landscape and visitor experience.[144]

The lack of structures and utilities in the surrounding area contributes to the site's historic authenticity, with the extensive viewsheds to the north, east, and south. Scenic and historic viewsheds are considered an important contributing factor to a positive visitor experience. Potential wind-power infrastructure, transmission lines, and any development adjacent to the park on the landscape could impact the valuable resources of the cultural and natural landscape and detract from the sense of place afforded through memorialization, commemoration, and the place of healing. According to the 2017 *Foundation Document*, in the future, strong relationships and regular communication with neighbors and government representatives will continue to be necessary to stay abreast of potential threats to the surrounding landscape.[145]

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[143] Colorado National Guard, "Frequently Asked Questions: Modification of the Cheyenne Low and High military operations areas in eastern Colorado and western Kansas," AFD-120502-071, https://www.140wg.ang.af.mil/Portals/36/documents/ops_expansion/AFD-120502-071.pdf?ver=2016-11-02-102958-867, accessed February 7, 2022; Colorado National Guard, "Fact Sheet: Proposed military operations area modification," AFD-120502-076, https://www.140wg.ang.af.mil/Portals/36/documents/ops_expansion/AFD-120502-076.pdf?ver=2016-11-02-102959-177, accessed February 7, 2022; Colorado Department of Transportation, Library: "Cheyenne Military Operations Area Modification Environmental Study," https://www.codot.gov/library/studies/study-archives/CheyenneMilitary (original link accessed February 7, 2022 and is no longer active; information is in hard copy in Sand Creek Massacre National Historic Site's Central Files); Colorado Division of Homeland Security & Emergency Management, Department of Public Safety, "Public Comment for Proposed Cheyenne Military Operations Area Modification," May 8, 2012. http://www.coemergency.com/2012/05/public-comment-for-proposed-cheyenne.html (original link accessed February 7, 2022, and is no longer active; information is in hard copy in Sand Creek Massacre National Historic Site's Central Files); Brandon Johansson, "Buckley's air apparent," *The Sentinel*, May 17, 2012. https://sentinelcolorado.com/news/buckleys-air-apparent-2. Accessed February 7, 2022; Richard Wilshusen, email to Steve Brady, Northern Cheyenne Tribe, June 29, 2012, SAND Electronic Records.

[144] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 32.

[145] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 32.

Climate Change

Climate change will likely affect the national historic site's vegetation and wildlife communities because of projected changes in annual temperature, precipitation levels, and extreme weather occurrences.[146] However, the rate and magnitude of these changes to specific populations of plants and animals is difficult to predict. Climate change will likely impact vegetation composition because air temperatures will continue to increase, with average low temperatures in winter and average high temperatures in summer increasing. These changes will likely alter species composition as some species requiring cooler temperatures will move northward. Warming temperatures could further alter the composition of native plant communities and increase problems related to insects and disease.[147] Climate change and air pollution are affecting biological communities of the short-grass prairie, and along with increasing development in the Front Range, may cause a decline in water resource availability.[148]

Years before Sand Creek was officially established as a national historic site (between the 2000 authorizing legislation and the establishment of the national historic site in 2007), NPS staff integrated the Sand Creek Massacre site into the NPS's Southern Plains Inventory and Monitoring (I&M) program, as a sort of "sister" park to Bent's Old Fort National Historic Site. Through this long relationship, the Sand Creek Massacre NHS and the High Plains Group of parks played a pioneering role in what eventually became a new collaborative approach to vegetation management among the Southern Plains I&M program, the NPS Exotic Plant Management Team, and the Fire Effects Monitoring Program, revolving around adaptive management planning for varying and unpredictable conditions such as climate change.

Upon her retirement in October 2018, Roberts summarized the purpose of the vegetation management collaborative in her Transition Report to the Acting High Plains Group Superintendent:

> For several years, the three parks in the High Plains Group have been part of an innovative, model collaboration among the parks, the Southern Plains Inventory and Monitoring Program, the Northern Rockies Exotic Plant Management Team (initially the Desert Southwest EPMT), and the Southern Plains Fire Group. . . . The main concept is to reduce redundant monitoring efforts in the parks by the SOPN, EPMT and FM program, each working individually for separate but related purposes, and to coordinate the expertise of all three programs into an annual adaptive management approach for the

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[146] Jack A. Morgan, Justin D. Derner, Daniel G. Milchunas, and Elise Pendall, "Management Implications of Global Change for Great Plains Rangelands," *Rangelands* (June 2008): 18–22.

[147] National Park Service, *Sand Creek Massacre National Historic Site: General Management Plan/ Environmental Assessment*, 2015, 118.

[148] National Park Service, *Foundation Document: Sand Creek Massacre National Historic Site*, 2017, 17.

> benefit of the parks. The idea is to have an annual review of each park by vegetation zones, develop recommendations for an annual work plan, monitor the results at the end of the year, and adjust the recommendations for the next year on a vegetation zone by vegetation zone basis. BEOL and SAND have also led the way in incorporating cultural landscape data into the vegetation management plans so that the plans are not in conflict. It has been an extremely beneficial approach for the parks, providing resource managers and the superintendent with a basis for planning, decision making, allocation of resources, and etc. The park's Vegetation Management Plan is based upon these vegetation zones and the adaptive management model.[149]

Part of the annual adaptive management strategy was to adjust vegetation management responses to conditions on an annual basis, such as those brought on by climate changes including weather extremes, species composition changes, drought, and floods. The adaptive management approach seeks to address the uncertainties inherent in environmental responses to climate change, allowing for a flexible approach to potential environmental changes and for evaluation and reevaluation of management actions to achieve their desired conditions.

Conclusion

For the Cheyenne and Arapaho tribal descendants, Sand Creek Massacre National Historic Site's cultural and natural resources are inextricably linked. Although cultural and natural resource management has been administratively separated at the site, the National Park Service has worked to manage these resources in an integrated way that ensures sensitivity to and respect for tribal needs and priorities. The NPS's cultural resource management efforts have prioritized the preservation of ethnographic resources, archeological resources, and museum collections related to the Sand Creek Massacre. Natural resource management work has focused on the preservation of resources including the site's landscape, ecosystems, topographic features, and aesthetic values such scenic views and quiet, contemplative spaces for visitors. Landscape restoration and land acquisition efforts have been responsive to tribal priorities (and the site's enabling legislation) for managing the site's cultural landscape to its appearance in 1864. Site managers and staff of Sand Creek Massacre National Historic Site have had to work in close partnership and consultation with tribal members to ensure the proper management of these important cultural and natural resources.

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[149] Alexa Roberts, Transition Report to Acting High Plains Group Superintendent Janet Frederick, October 2018, SAND Electronic Records.

Conclusion

In Sand Creek Massacre National Historic Site's first decade, staff and tribal representatives found that they had to relentlessly advocate for the small park. According to Alexa Roberts, "we always had to advocate for Sand Creek, period, because nobody knew what it was, it's not a known story, it's small, it's remote, it's in Southeastern Colorado and it felt like it has been regarded as incidental." She continued:

> [I]t's [been] a constant process of justification, justification, justification. But from our perspective, it was like, "this is the only massacre site in the entire National Park system. The story—[even though] it's a small park, visitation is miniscule—the story is huge, and, sorry, it's a unit of the National Park system, congress said so" [laughs]. . . . To us it felt like our story was so much bigger and so much more important than what we felt like that the perception of it just being a little, nobody's-going-to-go-there kind of park.

"To us it was like the most significant place in the whole park system," she concluded.

The persistence of the site's staff and tribal descendants has paid off. Not only have they helped establish the importance of the site within the national park system, but there has also been an evolution in how the state of Colorado and local residents talk about and understand the Sand Creek Massacre. Roberts recalled,

> Over the years . . . as these events took place in Sand Creek, stayed in the news, and persevered [laughs], and more and more tribal involvement . . . all of that, slowly you can start to see in blogs or commentary on newspaper articles . . . really an evolution in public discourse about Sand Creek. In the last twenty years plus, we've really seen this huge transformation in the way people react to Sand Creek, speak about Sand Creek, from something that's like lighting a match [laughs] to very respectful.[1]

Karl Zimmermann agreed and emphasized that including the word "massacre" in the title was a critical part of this acceptance:

> It would have never happened if the Park Service hadn't saw the opportunity to not only make Sand Creek a . . . National Historic Site, but to use the word massacre in the title. . . . [W]e weren't sure if we were starting a prairie fire or—but it didn't happen, that didn't happen and it just like, the healing started and it's been great.

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[1] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18, 2021.

Tribal involvement was critical to this shift, in part because it has brought Cheyenne and Arapaho voices back to the Colorado Plains. "There hasn't been any tribal presence here in anyone's memory," Roberts noted. Tribal involvement in the establishment of Sand Creek Massacre National Historic Site succeeded in changing this dynamic.

The history of Sand Creek Massacre National Historic Site's first 10 years, outlined in detail in this administrative history, reveals the tremendous work and effort that drove these changes in public understanding. Efforts by staff and tribal members included park planning and cultural and natural resource management work, partnership-building, hosting and participating in events that honored the history and memory of the Sand Creek Massacre, and efforts to highlight the site's mission at the local, state, and national level. These efforts would not have been effective, however, without a commitment from the site's leadership and staff to building a strong, lasting partnership with Cheyenne and Arapaho tribal members. This commitment is built on the recognition that, in Alexa Roberts's words, "Tribes have *spiritual* guardianship [of the site]. The National Park Service has *physical* guardianship."[2] As detailed in the introduction to this report, this approach to stewardship—with a serious commitment to tribal consultation and participation—would have been unimaginable throughout the vast majority of the NPS's history.

Sand Creek Massacre National Historic Site offers the National Park Service a model of relationship-building and partnership with indigenous communities at NPS sites that have natural, cultural, or spiritual significance to those communities. This model prioritizes dialogue and understanding between the NPS and tribal members and seeks to center tribal needs and priorities at these sites. The work can be challenging, contentious, and time-consuming; after all, tribal communities have historically had little reason to trust promises made by federal agencies. Yet the efforts by the staff of Sand Creek Massacre National Historic Site illuminate the importance and value of engaging in this process in good faith. They have created a strong foundation upon which the site can continue to preserve and protect the site for future generations and educate the public about the tragedy of the Sand Creek Massacre and its tremendous significance in American history.

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[2] Alexa Roberts and Karl Zimmermann, interview with Denver Service Center, Eads, CO, May 18–19, 2021.

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APPENDIX A

Interpretive Themes from the Sand Creek Massacre National Historic Site Foundation Document (2017) and Long-Range Interpretive Plan (2020)

Chapter Six of this administrative history includes the interpretive themes from the SAND Foundation Document, which was approved in December 2017, at the very end of the period covered by this administrative history (2007–2017). In 2020, a long-range interpretive plan (LRIP) was completed with additional refinements to the interpretive themes. The interpretive themes from the LRIP are the most recent for SAND at the time of writing. This appendix includes both sets for comparison.

Sand Creek Massacre National Historic Site Primary Interpretive Themes: 2017 Foundation Document

The following interpretive themes have been identified for Sand Creek Massacre National Historic Site. (Note that the order of the themes does not reflect the level of significance.)

Sand Creek Massacre National Historic Site Primary Interpretive Themes

1. To the Cheyenne and Arapaho people, particularly those who are descended from victims and survivors, the site of the Sand Creek Massacre has profound sacred and spiritual significance.
2. The inhuman brutality against the Cheyenne and Arapaho elicited territorial outrage, which spread nationally and destroyed the trust of many Native people in the U.S. government and those American ideals it was supposed to represent.
    A. Even amidst the carnage of the Civil War, military and congressional investigations were launched resulting in official condemnation of the massacre.

3. The murderous betrayal of the Cheyenne and Arapaho at Sand Creek profoundly disrupted the traditional, spiritual, social, political, economic and geographic structures of the tribes, with far-reaching impacts that are still painful today.
    A. The loss of 13 chiefs of the Cheyenne Council of 44, killed at Sand Creek, greatly impacted the political structure and institutional knowledge of the tribe.
4. The Sand Creek Massacre teaches a universal lesson that rejection of conscience based on fear, hysteria and stereotyping can lead to a catastrophic dehumanization of people of different cultures, beliefs and ethnicities.
    A. Through education and understanding of the value of diversity, all Americans can assist in minimizing the chances of similar incidents in the future.
5. The Sand Creek Massacre represents the attempted extermination of American Indian tribes as they struggle to maintain their lands, cultures, values and identities in the face of centuries of expansionist repression and subjugation.
6. The Sand Creek Massacre reveals good and evil qualities, such as courage, anger, depravity, grief, indifference, perseverance, fear, hate, greed, forgiveness and the quest for healing through its heroes, victims, perpetrators, survivors and descendants.
7. The Cheyenne and Arapaho people at Sand Creek, representing a long developed, mature, complex and successful civilization trying to follow the rules of tribal and U.S. law at a designated place of safety, were savagely attacked in an uncivilized manner by the United States Army.
8. The Sand Creek Massacre led to an escalation in conflict between Plains Indians and the dominant American society, which carried forward for decades punctuated by episodes of intense military activity.
9. The intense competition for resources from large waves of European American immigrants settling the plains in a short span of time is one of the underlying causes of the Sand Creek Massacre.
    A. The discovery of gold and the coming of the railroads led to an onslaught of migration to the region.
    B. The competition between immigrants and Native peoples led to attempts to eradicate both the Native tribes and the resources on which they depended within the path of this migration.
10. Many of today's descendants owe their lives to the courage of the women at Sand Creek.
    A. When Chivington ordered his troops to attack the Cheyenne and Arapaho encampment, he knowingly attacked a peace camp that was inhabited by the elderly, children, and women of various ages.
    B. Women were not just passive victims of the attack; many girls and/or young women escaped, finding refuge wherever they could.
    C. Some women helped other family members escape, and a few even chose to fight.

11. Due to the decision of officers, such as Captain Silas Soule and Lieutenant Joseph Cramer, to disregard their orders, many Cheyenne and Arapaho descendants, as well as Sand Creek Massacre National Historic Site, exist today.
12. The history of laws and treaties both before and after the massacre show a pattern by the U.S. government of both broken obligations and some later attempts to acknowledge culpability up to and including the passage of the legislation creating the Sand Creek Massacre National Historic Site.
    A. The drive by the U.S. government to construct a transcontinental railroad in the 1800's led to extinguishment of treaties and displacement of native peoples throughout the Great Plains and beyond.
    B. In 1865, the U.S. government officially accepted culpability for the massacre and further agreed to indemnify massacre survivors through Article 6 of the Treaty of the Little Arkansas.
    C. The tragedy of the Sand Creek Massacre shocked a nation, leading Congress to enact legislation creating the Sand Creek Massacre National Historic Site in 2000.

Sand Creek Massacre National Historic Site Primary Interpretive Themes: 2020 Long-Range Interpretive Plan

Some themes have subthemes listed under them in italicized text. The themes and subthemes presented here were approved by Tribal representatives during a consultation held in Denver in October 2017. Themes are numbered for reference purposes only not to indicate any priority or preference.

1) To the Cheyenne and Arapaho people, particularly those who are descended from victims and survivors, the site of the Sand Creek Massacre has profound sacred and spiritual significance.
    a. The blood of those lost here in 1864 has become part of the living landscape and their spirits remain here, as much a part of the landscape as the plants and animals.
    b. Every year Cheyenne and Arapaho honor the spirits of those who were killed in 1864 and call upon the spirits for healing, not only for their own people, but for all those who visit this sacred ground.
2) The inhuman brutality against the Cheyenne and Arapaho elicited territorial outrage which spread nationally, and destroyed the trust of many Native people in the U.S. government and those American ideals it was supposed to represent.

   a. *Even amidst the carnage of the Civil War, military and Congressional investigations were launched resulting in official condemnation of the massacre.*

3) The murderous betrayal of the Cheyenne and Arapaho at Sand Creek profoundly disrupted the traditional, spiritual, social, political, economic and geographic structures of the tribes with far-reaching impacts that are still painful today.

   a. *The loss of 13 chiefs of the Cheyenne Council of 44, and 1 Arapaho chief, killed at Sand Creek, greatly impacted the political structure and institutional knowledge of the tribes.*

4) The Sand Creek Massacre teaches a universal lesson that rejection of conscience based on fear, hysteria and stereotyping can lead to a catastrophic dehumanization of people of different cultures, beliefs and ethnicities.

   a. *Through education and understanding of the value of diversity, all Americans can "assist in minimizing the chances of similar incidents in the future," as described in the Sand Creek Massacre.*

5) The Sand Creek Massacre represents the attempted extermination of American Indian tribes as they struggle to maintain their lands, cultures, values and identities in the face of centuries of expansionist repression and subjugation.

6) The Sand Creek Massacre reveals good and evil qualities such as courage, anger, depravity, grief, indifference, perseverance, fear, hate, greed, forgiveness and the quest for healing through its heroes, victims, perpetrators, survivors and descendants.

7) The Cheyenne and Arapaho people at Sand Creek, representing a long developed, mature, complex and successful civilization trying to follow the rules of tribal and U.S. law at a designated place of safety, were savagely attacked in an uncivilized manner by the United States Army.

8) The Sand Creek Massacre led to an escalation in conflict between Plains Indians and the dominant American society which carried forward for decades punctuated by episodes of intense military activity.

9) The intense competition for resources from large waves of Euro-American emigrants settling the plains in a short span of time is one of the underlying causes of the Sand Creek Massacre.

   a. *The discovery of gold and the coming of the railroads led to an onslaught of migration to the region.*

   b. *The competition between emigrants and Native peoples led to attempts to eradicate both the Native tribes and the resources on which they depended within the path of this migration.*

10) Many of today's descendants owe their lives to the courage of the women at Sand Creek.

   a. *When Chivington ordered his troops to attack the Cheyenne and Arapaho encampment, he knowingly attacked a peace camp that was inhabited by the elderly, children, and women of various ages.*

   b. *Women were not just passive victims of the attack; many girls and/or young women escaped the attack by finding refuge wherever they could.*
   c. *Some women helped other family members escape, and a few even chose to fight.*

11) Due to the decision of some officers, such as Captain Silas Soule and Lieutenant Joseph Cramer, to disregard their orders, many Cheyenne and Arapaho descendants, as well as Sand Creek Massacre National Historic Site, exist today.

12) The history of laws and treaties both before and after the massacre show a pattern by the U.S. government of both broken obligations and some later attempts to acknowledge culpability up to and including the passage of legislation creating the Sand Creek Massacre National Historic Site.

   a. *The drive by the US government to construct a transcontinental railroad in the 1800s led to extinguishment of treaties and displacement of native peoples throughout the Great Plains and beyond.*
   b. *In 1865, the US government officially accepted culpability for the massacre and further agreed to indemnify massacre survivors through Article 6 of the Treaty of the Little Arkansas.*
   c. *The tragedy of the Sand Creek Massacre shocked a nation, leading Congress to enact legislation authorizing establishment of the Sand Creek Massacre National Historic Site in 2000.*

APPENDIX B

Enabling Legislation and Legislative Acts

This appendix includes the 1998 act authorizing the Secretary of the Interior to study the suitability and feasibility of designating the property as a new unit of the national park system, the 2000 enabling legislation for Sand Creek Massacre National Historic Site, and the Sand Creek Massacre National Historic Site Trust Act of 2005.

Sand Creek Massacre National Historic Site Study Act of 1998

Public Law 105–243
105th Congress

An Act

To authorize the Secretary of the Interior to study the suitability and feasibility of designating the Sand Creek Massacre National Historic Site in the State of Colorado as a unit of the National Park System, and for other purposes.

Oct. 6, 1998
[S. 1695]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

Sand Creek Massacre National Historic Site Study Act of 1998.

SECTION 1. SHORT TITLE.

This Act may be cited as the "Sand Creek Massacre National Historic Site Study Act of 1998".

SEC. 2. FINDINGS.

(a) FINDINGS.—Congress finds that—

John M. Chivington. Black Kettle.

(1) on November 29, 1864, Colonel John M. Chivington led a group of 700 armed soldiers to a peaceful Cheyenne village of more than 100 lodges on the Big Sandy, also known as Sand Creek, located within the Territory of Colorado, and in a running fight that ranged several miles upstream along the Big Sandy, slaughtered several hundred Indians in Chief Black Kettle's village, the majority of whom were women and children;

(2) the incident was quickly recognized as a national disgrace and investigated and condemned by 2 congressional committees and a military commission;

Cheyenne Tribe. Arapaho Tribe.

(3) although the United States admitted guilt and reparations were provided for in article VI of the Treaty of Little Arkansas of October 14, 1865 (14 Stat. 703) between the United States and the Cheyenne and Arapaho Tribes of Indians, those treaty obligations remain unfulfilled;

(4) land at or near the site of the Sand Creek Massacre may be available for purchase from a willing seller; and

(5) the site is of great significance to the Cheyenne and Arapaho Indian descendants of those who lost their lives at the incident at Sand Creek and to their tribes, and those descendants and tribes deserve the right of open access to visit the site and rights of cultural and historical observance at the site.

SEC. 3. DEFINITIONS.

In this Act:

(1) SECRETARY.—The term "Secretary" means the Secretary of the Interior acting through the Director of the National Park Service.

(2) SITE.—The term "site" means the Sand Creek Massacre site described in section 2.

(3) TRIBES.—The term "Tribes" means—
(A) the Cheyenne and Arapaho Tribe of Oklahoma;
(B) the Northern Cheyenne Tribe; and
(C) the Northern Arapaho Tribe.

SEC. 4. STUDY.

Deadline

(a) IN GENERAL.—Not later than 18 months after the date on which funds are made available for the purpose, the Secretary, in consultation with the Tribes and the State of Colorado, shall submit to the Committee on Energy and Natural Resources of the Senate and the Committee on Resources of the House of Representatives a resource study of the site.

(b) CONTENTS.—The study under subsection (a) shall—

(1) identify the location and extent of the massacre area and the suitability and feasibility of designating the site as a unit of the National Park System; and

(2) include cost estimates for any necessary acquisition, development, operation and maintenance, and identification of alternatives for the management, administration, and protection of the area.

SEC. 5. AUTHORIZATION OF APPROPRIATIONS.

There are authorized to be appropriated such sums as are necessary to carry out this Act.

Approved October 6, 1998.

LEGISLATIVE HISTORY—S. 1695:

HOUSE REPORTS: No. 105–697 (Comm. on Resources).
SENATE REPORTS: No. 105–244 (Comm. on Energy and Natural Resources).
CONGRESSIONAL RECORD, Vol. 144 (1998):
July 17, considered and passed Senate.
Sept. 18, considered and passed House.

Sand Creek Massacre National Historic Site Trust Act of 2000

Public Law 106–465
106th Congress

An Act

To authorize the Secretary of the Interior to establish the Sand Creek Massacre National Historic Site in the State of Colorado.

Nov. 7, 2000
[S. 2950]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

Sand Creek Massacre National Historic Site Establishment Act of 2000.
16 USC 461 note.

SECTION 1. SHORT TITLE.

This Act may be cited as the "Sand Creek Massacre National Historic Site Establishment Act of 2000".

SEC. 2. FINDINGS AND PURPOSES.

(a) FINDINGS.—Congress finds that—

(1) on November 29, 1864, a peaceful village of Cheyenne and Arapaho Indians under the leadership of Chief Black Kettle, along Sand Creek in southeastern Colorado territory was attacked by approximately 700 volunteer soldiers commanded by Colonel John M. Chivington;

(2) more than 150 Cheyenne and Arapaho were killed in the attack, most of whom were women, children, or elderly;

(3) during the massacre and the following day, the soldiers committed atrocities on the dead before withdrawing from the field;

(4) the site of the Sand Creek Massacre is of great significance to descendants of the victims of the massacre and their respective tribes, for the commemoration of ancestors at the site;

(5) the site is a reminder of the tragic extremes sometimes reached in the 500 years of conflict between Native Americans and people of European and other origins concerning the land that now comprises the United States;

(6) Congress, in enacting the Sand Creek Massacre National Historic Site Study Act of 1998 (Public Law 105–243; 112 Stat. 1579), directed the National Park Service to complete a resources study of the site;

(7) the study completed under that Act—

(A) identified the location and extent of the area in which the massacre took place; and

(B) confirmed the national significance, suitability, and feasibility of, and evaluated management options for, that area, including designation of the site as a unit of the National Park System; and

(8) the study included an evaluation of environmental impacts and preliminary cost estimates for facility development, administration, and necessary land acquisition.

(b) PURPOSES.—The purposes of this Act are—

(1) to recognize the importance of the Sand Creek Massacre as—

(A) a nationally significant element of frontier military and Native American history; and

(B) a symbol of the struggles of Native American tribes to maintain their way of life on ancestral land;

(2) to authorize, on acquisition of sufficient land, the establishment of the site of the Sand Creek Massacre as a national historic site; and

(3) to provide opportunities for the tribes and the State to be involved in the formulation of general management plans and educational programs for the national historic site.

SEC. 3. DEFINITIONS.

In this Act:

(1) DESCENDANT.—The term "descendant" means a member of a tribe, an ancestor of whom was injured or killed in, or otherwise affected by, the Sand Creek Massacre.

(2) MANAGEMENT PLAN.—The term "management plan" means the management plan required to be developed for the site under section 7(a).

(3) SECRETARY.—The term "Secretary" means the Secretary of the Interior, acting through the Director of the National Park Service.

(4) SITE.—The term "site" means the Sand Creek Massacre National Historic Site established under section 4(a).

(5) STATE.—The term "State" means the State of Colorado.

(6) TRIBE.—The term "tribe" means—

(A) the Cheyenne and Arapaho Tribes of Oklahoma;

(B) the Northern Cheyenne Tribe; or

(C) the Northern Arapaho Tribe.

SEC. 4. ESTABLISHMENT.

(a) IN GENERAL.—

(1) DETERMINATION.—On a determination by the Secretary that land described in subsection (b)(1) containing a sufficient quantity of resources to provide for the preservation, memorialization, commemoration, and interpretation of the Sand Creek Massacre has been acquired by the National Park Service, the Secretary shall establish the Sand Creek Massacre National Historic Site, Colorado.

Federal Register, publication.

(2) PUBLICATION.—The Secretary shall publish in the Federal Register a notice of the determination of the Secretary under paragraph (1).

(b) BOUNDARY.—

(1) MAP AND ACREAGE.—The site shall consist of approximately 12,480 acres in Kiowa County, Colorado, the site of the Sand Creek Massacre, as generally depicted on the map entitled, "Sand Creek Massacre Historic Site", numbered, SAND 80,013 IR, and dated July 1, 2000.

(2) LEGAL DESCRIPTION.—The Secretary shall prepare a legal description of the land and interests in land described in paragraph (1).

(3) PUBLIC AVAILABILITY.—The map prepared under paragraph (1) and the legal description prepared under paragraph (2) shall be on file and available for public inspection in the appropriate offices of the National Park Service.

(4) BOUNDARY REVISION.—The Secretary may, as necessary, make minor revisions to the boundary of the site in accordance with section 7(c) of the Land and Water Conservation Act of 1965 (16 U.S.C. 460l–9(c)).

SEC. 5. ADMINISTRATION.

(a) IN GENERAL.—The Secretary shall manage the site in accordance with—

(1) this Act;

(2) the Act entitled "An Act to establish a National Park Service, and for other purposes", approved August 25, 1916 (39 Stat. 535; 16 U.S.C. 1 et seq.);

(3) the Act of August 21, 1935 (16 U.S.C. 461 et seq.); and

(4) other laws generally applicable to management of units of the National Park System.

(b) MANAGEMENT.—The Secretary shall manage the site—

(1) to protect and preserve the site, including—

(A) the topographic features that the Secretary determines are important to the site;

(B) artifacts and other physical remains of the Sand Creek Massacre; and

(C) the cultural landscape of the site, in a manner that preserves, as closely as practicable, the cultural landscape of the site as it appeared at the time of the Sand Creek Massacre;

(2)(A) to interpret the natural and cultural resource values associated with the site; and

(B) provide for public understanding and appreciation of, and preserve for future generations, those values; and

(3) to memorialize, commemorate, and provide information to visitors to the site to—

(A) enhance cultural understanding about the site; and

(B) assist in minimizing the chances of similar incidents in the future.

(c) CONSULTATION AND TRAINING.—

(1) IN GENERAL.—In developing the management plan and preparing educational programs for the public about the site, the Secretary shall consult with and solicit advice and recommendations from the tribes and the State.

(2) AGREEMENTS.—The Secretary may enter into cooperative agreements with the tribes (including boards, committees, enterprises, and traditional leaders of the tribes) and the State to carry out this Act.

SEC. 6. ACQUISITION OF PROPERTY.

(a) IN GENERAL.—The Secretary may acquire land and interests in land within the boundaries of the site—

(1) through purchase (including purchase with donated or appropriated funds) only from a willing seller; and

(2) by donation, exchange, or other means, except that any land or interest in land owned by the State (including a political subdivision of the State) may be acquired only by donation.

(b) PRIORITY FOR ACQUISITION.—The Secretary shall give priority to the acquisition of land containing the marker in existence on the date of enactment of this Act, which states "Sand Creek

Battleground, November 29 and 30, 1864", within the boundary of the site.

(c) COST-EFFECTIVENESS.—

(1) IN GENERAL.—In acquiring land for the site, the Secretary, to the maximum extent practicable, shall use cost-effective alternatives to Federal fee ownership, including—

(A) the acquisition of conservation easements; and

(B) other means of acquisition that are consistent with local zoning requirements.

(2) SUPPORT FACILITIES.—A support facility for the site that is not within the designated boundary of the site may be located in Kiowa County, Colorado, subject to an agreement between the Secretary and the Commissioners of Kiowa County, Colorado.

SEC. 7. MANAGEMENT PLAN.

Deadline.

(a) IN GENERAL.—Not later than 5 years after the date on which funds are made available to carry out this Act, the Secretary shall prepare a management plan for the site.

(b) INCLUSIONS.—The management plan shall cover, at a minimum—

(1) measures for the preservation of the resources of the site;

(2) requirements for the type and extent of development and use of the site, including, for each development—

(A) the general location;

(B) timing and implementation requirements; and

(C) anticipated costs;

(3) requirements for offsite support facilities in Kiowa County;

(4) identification of, and implementation commitments for, visitor carrying capacities for all areas of the site;

(5) opportunities for involvement by the tribes and the State in the formulation of educational programs for the site; and

(6) opportunities for involvement by the tribes, the State, and other local and national entities in the responsibilities of developing and supporting the site.

SEC. 8. NEEDS OF DESCENDANTS.

(a) IN GENERAL.—A descendant shall have reasonable rights of access to, and use of, federally acquired land within the site, in accordance with the terms and conditions of a written agreement between the Secretary and the tribe of which the descendant is a member.

(b) COMMEMORATIVE NEEDS.—In addition to the rights described in subsection (a), any reasonable need of a descendant shall be considered in park planning and operations, especially with respect to commemorative activities in designated areas within the site.

SEC. 9. TRIBAL ACCESS FOR TRADITIONAL CULTURAL AND HISTORICAL OBSERVANCE.

(a) ACCESS.—

(1) IN GENERAL.—The Secretary shall grant to any descendant or other member of a tribe reasonable access to federally acquired land within the site for the purpose of carrying out a traditional, cultural, or historical observance.

(2) NO FEE.—The Secretary shall not charge any fee for access granted under paragraph (1).

(b) CONDITIONS OF ACCESS.—In granting access under subsection (a), the Secretary shall temporarily close to the general public one or more specific portions of the site in order to protect the privacy of tribal members engaging in a traditional, cultural, or historical observance in those portions; and any such closure shall be made in a manner that affects the smallest practicable area for the minimum period necessary for the purposes described above.

(c) SAND CREEK REPATRIATION SITE.—

(1) IN GENERAL.—The Secretary shall dedicate a portion of the federally acquired land within the site to the establishment and operation of a site at which certain items referred to in paragraph (2) that are repatriated under the Native American Graves Protection and Repatriation Act (25 U.S.C. 300 et seq.) or any other provision of law may be interred, reinterred, preserved, or otherwise protected.

(2) ACCEPTABLE ITEMS.—The items referred to in paragraph (1) are any items associated with the Sand Creek Massacre, such as—

(A) Native American human remains;
(B) associated funerary objects;
(C) unassociated funerary objects;
(D) sacred objects; and
(E) objects of cultural patrimony.

(d) TRIBAL CONSULTATION.—In exercising any authority under this section, the Secretary shall consult with, and solicit advice and recommendations from, descendants and the tribes.

SEC. 10. AUTHORIZATION OF APPROPRIATIONS.

There are authorized to be appropriated such sums as are necessary to carry out this Act.

Approved November 7, 2000.

LEGISLATIVE HISTORY—S. 2950:

SENATE REPORTS: No. 106–418 (Comm. on Energy and Natural Resources).
CONGRESSIONAL RECORD, Vol. 146 (2000):
Oct. 5, considered and passed Senate.
Oct. 23, considered and passed House.

Sand Creek Massacre National Historic Site Trust Act of 2005

Public Law 109–45
109th Congress

An Act

To further the purposes of the Sand Creek Massacre National Historic Site Establishment Act of 2000.

Aug. 2, 2005
[H.R. 481]

Be it enacted by the Senate and House of Representatives of the United States of America in Congress assembled,

SECTION 1. SHORT TITLE.

Sand Creek Massacre National Historic Trust Act of 2005.
16 USC 461 note.

This Act may be cited as the "Sand Creek Massacre National Historic Site Trust Act of 2005".

SEC. 2. DEFINITIONS.

In this Act:

(1) FACILITY.—The term "facility" means any structure, utility, road, or sign constructed on the trust property on or after the date of enactment of this Act.

(2) IMPROVEMENT.—The term "improvement" means—

(A) a 1,625 square foot 1-story ranch house, built in 1952, located in the SW quarter of sec. 30, T. 17 S., R. 45 W., sixth principal meridian;

(B) a 3,600 square foot metal-constructed shop building, built in 1975, located in the SW quarter of sec. 30, T. 17 S., R. 45 W., sixth principal meridian;

(C) a livestock corral and shelter; and

(D) a water system and wastewater system with all associated utility connections.

(3) SECRETARY.—The term "Secretary" means the Secretary of the Interior.

(4) TRIBE.—The term "Tribe" means the Cheyenne and Arapaho Tribes of Oklahoma, a federally recognized Indian tribe.

(5) TRUST PROPERTY.—The term "trust property" means the real property, including rights to all minerals, and excluding the improvements, formerly known as the "Dawson Ranch", consisting of approximately 1,465 total acres presently under the jurisdiction of the Tribe, situated within Kiowa County, Colorado, and more particularly described as follows:

(A) The portion of sec. 24, T. 17 S., R. 46 W., sixth principal meridian, that is the Eastern half of the NW quarter, the SW quarter of the NE quarter, the NW quarter of the SE quarter, sixth principal meridian.

(B) All of sec. 25, T. 17 S., R. 46 W., sixth principal meridian.

(C) All of sec. 30, T. 17 S., R. 45 W., sixth principal meridian.

SEC. 3. CONVEYANCE OF LAND TO BE HELD IN TRUST FOR THE CHEYENNE AND ARAPAHO TRIBES OF OKLAHOMA.

(a) LAND HELD IN TRUST FOR THE CHEYENNE AND ARAPAHO TRIBES OF OKLAHOMA.—On conveyance of title to the trust property by the Tribe to the United States, without any further action by the Secretary, the trust property shall be held in trust for the benefit of the Tribe.

(b) TRUST.—All right, title, and interest of the United States in and to the trust property, except any facilities constructed under section 4(b), are declared to be held by the United States in trust for the Tribe.

SEC. 4. IMPROVEMENTS AND FACILITIES.

(a) IMPROVEMENTS.—The Secretary may acquire by donation the improvements in fee.

(b) FACILITIES.—

(1) IN GENERAL.—The Secretary may construct a facility on the trust property only after consulting with, soliciting advice from, and obtaining the agreement of, the Tribe, the Northern Cheyenne Tribe, and the Northern Arapaho Tribe.

(2) OWNERSHIP.—Facilities constructed with Federal funds or funds donated to the United States shall be owned in fee by the United States.

(c) FEDERAL FUNDS.—For the purposes of the construction, maintenance, or demolition of improvements or facilities, Federal funds shall be expended only on improvements or facilities that are owned in fee by the United States.

SEC. 5. SURVEY OF BOUNDARY LINE; PUBLICATION OF DESCRIPTION.

Deadline.

(a) SURVEY OF BOUNDARY LINE.—To accurately establish the boundary of the trust property, not later than 180 days after the date of enactment of this Act, the Secretary shall cause a survey to be conducted by the Office of Cadastral Survey of the Bureau of Land Management of the boundary lines described in section 2(5).

(b) PUBLICATION OF LAND DESCRIPTION.—

Federal Register, publication.

(1) IN GENERAL.—On completion of the survey under subsection (a), and acceptance of the survey by the representatives of the Tribe, the Secretary shall cause the full metes and bounds description of the lines, with a full and accurate description of the trust property, to be published in the Federal Register.

(2) EFFECT.—The description shall, on publication, constitute the official description of the trust property.

SEC. 6. ADMINISTRATION OF TRUST PROPERTY.

(a) IN GENERAL.—The trust property shall be administered in perpetuity by the Secretary as part of the Sand Creek Massacre National Historic Site, only for historical, traditional, cultural, and other uses in accordance with the Sand Creek Massacre National Historic Site Establishment Act of 2000 (16 U.S.C. 461 note; Public Law 106–465).

(b) ACCESS FOR ADMINISTRATION.—For purposes of administration, the Secretary shall have access to the trust property, improvements, and facilities as necessary for management of the Sand Creek Massacre National Historic Site in accordance with the Sand Creek Massacre National Historic Site Establishment Act of 2000 (16 U.S.C. 461 note; Public Law 106–465).

(c) DUTY OF THE SECRETARY.—The Secretary shall take such action as is necessary to ensure that the trust property is used only in accordance with this section.

(d) SAVINGS PROVISION.—Nothing in this Act supersedes the laws and policies governing units of the National Park System.

SEC. 7. ACQUISITION OF PROPERTY.

Section 6(a)(2) of the Sand Creek Massacre National Historic Site Establishment Act of 2000 (16 U.S.C. 461 note; Public Law 106–465) is amended by inserting "or exchange" after "only by donation".

Approved August 2, 2005.

LEGISLATIVE HISTORY—H.R. 481 (S. 57):

HOUSE REPORTS: No. 109–107 (Comm. on Resources).
SENATE REPORTS: No. 109–20 (Comm. on Energy and Natural Resources).
CONGRESSIONAL RECORD, Vol. 151 (2005):
June 27, considered and passed House.
July 26, considered and passed Senate.