Cultural Assessments and the Planning Process

by Luciano Minerbi, AICP

Culture is one of a community’s greatest assets. Cultural heritage, practices, and artifacts all improve people’s quality of life. Culture includes social relations and institutions, cultural patterns, and learned behaviors. It is passed down through generations, orally and via example and practice, and evolves in this social context. It links people together and reveals assumptions that they have about themselves and others (National Park Service 1990; U.S. EPA 2002, 1–11). Related environmental concerns focus on the viability of natural processes, integrity of ecosystems, and availability of natural resources for cultural, religious, and subsistence practices.

Culture-based planning incorporates cultural norms and environmental concerns, addressing values, traditions, knowledge, beliefs, ideologies, morals, religion, language, law, habits, customs, practices, social arrangements, arts, crafts, structures, sites, and lifestyles of people. It pays attention to world views, metaphors, and symbols people use to explain the world around them, retain a sense of place, and give meaning to what they do.

Traditional cultural properties include the natural resources and prehistoric and historic sites associated with a people’s culture. Infringement upon these properties is perceived to be deeply offensive. The idea of “cultural continuity” helps to discover “where we come from, where we are, and where we are going.” This outlook is appropriate since communities are dynamic and constantly evolving as people move in, move out, go through life stages, or face different situations (U.S. EPA 2002).

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There are many cultures in a place, including the culture of the native people and those of the newcomers. Elite, popular, minority, and indigenous cultures may all be present in one locality. The tapestry of culture has many threads, with each culture importing its ways, language, cultural landscape, and building styles, interacting with the preexisting culture, and evolving into a complex and layered system of local cultures.

All these cultural realities need to be accounted for in conflict resolution and planning. Consensus building and partnerships are possible when different positions about an issue are acknowledged and common interests among groups are identified (U.S. EPA 2002). Cultural harmony is facilitated when newcomers are welcome and acculturated to local ways, and when different cultures are celebrated so that everybody learns to respect each other’s heritage. Events such as cultural festivals are a sign of vibrant ethnic communities where
Residents and visitors intermingle. Understanding cultural protocols to enter, stay, and exit places and events are important in multi-cultural coexistence. Many American Indians, Alaskan Natives, and Native Hawai’ians engage in customary and traditional subsistence practices that need protection as much as the ecosystems in which they take place.

Federal Legislation
There are several pieces of federal legislation that deal specifically with cultural resources and impacts. They include:

- **American Antiquities Act of 1906.** Protects prehistoric and historic ruins or monuments “or any object of antiquity” on federal lands. Provides for the executive branch of government to designate national monuments.

- **Historic Sites Act of 1935.** Creates a policy for protecting “nationally significant” historic structures, battlefields, and antiquities. Provides the basis for the National Historic Landmarks program and the Historic American Buildings Survey/Historic American Engineering Record (HABS/HAER), which provides standards for architectural and engineering documentation.

- **National Environmental Policy Act of 1969.** Protects historic, cultural, and natural aspects of our national heritage from impacts by federally funded projects, through the Environmental Assessment (EA) and Environmental Impact Statement (EIS) processes.

- **National Historic Preservation Act of 1966.** Protects the historical and cultural foundations of the U.S. Created the National Register of Historic Places and the State Historic Preservation Offices. A 1992 amendment provides for the inclusion of significant Indians and native Hawai’ian places.

- **Section 106 of the National Historic Preservation Act.** Prescribes a process for federal agencies to account for impacts of federally funded projects on historic and cultural resources that are included on or eligible for inclusion on the National Register. Provides for stakeholders’ participation, consultation for identification and assessment, and resolution of adverse effects.

- **Archaeological and Historic Preservation Act of 1974.** Calls for the preservation of historical and archeological data which might otherwise be lost as the result of a federal construction project.

- **American Indian Religious Freedom Act of 1978.** Ensures that federal actions do not interfere with the rights of Native Americans to exercise their traditional religions. Includes access to sites, use, and possession of sacred objects, and ceremonies and traditional rites.

- **Native American Grave Protection and Repatriation Act of 1990.** Gives guidance on how Native American remains and burial artifacts are to be treated, encourages in situ preservation, and requires federal agencies to consult with affiliated Native Americans.

- **Coastal Zone Management Act of 1972.** Requires participating coastal states to include protection of coastal habitat and coastal culture in their plans.

- **Department of Transportation Act of 1966, Section 4(f).** Allows U.S. DOT to use public land for transportation projects only if there is no prudent or feasible alternative and all possible planning has been done to minimize harm to significant historic sites.

In addition, the National Park Service as an agency seeks to preserve natural and cultural resources and values of the national park system through various programs, including a Tribal Preservation Program, the National Archaeological Database, the Historic Landscapes Initiative, and the Cultural Resources Diversity Program.

Cultural Impact Assessments
Addressing cultural concerns through a cultural impact assessment process is a requirement for evaluating federally funded projects, particularly in EA, EIS, and related processes. A cultural impact assessment is done to evaluate the impacts of a plan, program, or project on the practices and beliefs of cultural or ethnic groups in a locality. It includes scoping, ethnographic interviews, oral histories, meetings, consultations, and documentary research. A cultural impact assessment explains the method and level of effort used in collecting information and impediments incurred in the study. It spells out cultural resources, practices, and beliefs identified; their significance and how they will be affected by the proposed project; and what would be the alternatives or mitigating actions. Resolving cultural issues early minimizes conflicts during plan implementation.
The protocol of a cultural impact assessment involves:

- identify, consult, and interview individuals and organizations with expertise on cultural resources, practices, and beliefs and with knowledge of the affected area;
- conduct ethnographic and historical research;
- describe the cultural resources, practices, and beliefs located within the affected area; and
- assess the impact of the proposed action, alternatives to it, and mitigation measures.

When collecting data, persons interviewed should give informed consent to be interviewed, and their wishes about confidentiality should be respected. "Human Subject" protocols should be adhered to, particularly for federally funded studies. In addition to this information, other data sources include primary resource materials (written records, maps, and oral histories) and secondary source materials (such as published and unpublished manuscripts, and rulings pertaining to the study area).

Human and ecological frameworks link people to places and to the cultural use of natural resources.

Cultural assessments utilize multiple methods, including focus groups, telephone interviews, in-depth interviews, and visioning sessions. The use of multiple methods allows for triangulation or cross-checking of the results. The findings from a focus group, for example, allows for framing of the issues and for formulating, refining, and pre-testing the questions to be used in the telephone and in-depth interviews.

The result of the surveys should include respondents' attitude on the community, quality of life, appreciation for a region's beauty and ecology, improved community knowledge, support to follow through with a community plan, a new project's priorities, limited economic development, and environmental protection.

The value of the assessment includes using the findings for a conservation plan: fostering education, stewardship, networking, and coalition building; improving organizational capacity, participation, partnerships, and research; forming 501 (c)(3) organizations; setting up new programs and offices in government agencies; and obtaining funds from states and Congress. Resources for the endeavor can come from various agencies, NGOs, the public and private sector, and local universities (U.S. EPA 2000).

Cultural practices encompass both those that are invisible or footloose, and those that leave a footprint. They include places where cultural resources are grown, manufactured, distributed, or sold. Useful recommendations that may emerge are establishing cultural advisory groups, implementing guidelines to treat burial sites, accommodating festivals and parades, and connecting public transit stations with cultural events and sites (PB Consulting and Norma Wong, December 2001).

**Frameworks and Indicators for Cultural Assessments**

Human and ecological frameworks link people to places and to the cultural use of natural resources. They include family and the network of kin; the integrity and continuity of community life; human well-being and spirituality with a holistic view of physical, mental, and cultural health; the natural and cultural resources needed for subsistence, cultural, and religious practices; indigenous rights and responsibilities to access, lands, and resource use; and community-based sustainable economic development. An ecological model of this would look at development projects, their impact on community and natural elements, and the responses of those elements to the impacts (McGregor, Minerbi, Matsuoka, 1998).

These frameworks should be developed as cultural indicators that are integrated with other indicators, consisting of both qualitative and quantitative data. A multi-method approach allows for triangulation of results and cross-checking of information collected through various ways, including surveys, focus groups, participatory mapping, visioning, and library and archival research. This is in addition to field work and site inspections (U.S. EPA 2002; Matsuoka, McGregor, Minerbi, 1998).
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<th>Planning Process Steps</th>
<th>Cultural Considerations</th>
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<tr>
<td>Decide to Plan</td>
<td>Stakeholders embark in a planning process, harmonized with cultural values; a consensual process emerges.</td>
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<td>Mobilize Leadership</td>
<td>Ethnic groups participate; the planning message is culturally translated using local language. Conflict resolution and ceremonies may be in order before social contracts materialize.</td>
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<td>Collect Data on Community and Local Area</td>
<td>Entry, exit, and stay protocols, events, and ceremonies are culturally sensitive; they are staged by community members in field work as they help to document community identity, structure, networks, scenic and cultural landscapes, sense of place, and local resource use. Inventories include cultural and archaeological sites; spiritual, sacred, and culturally sensitive areas; food and medicinal plant gathering and ethno-botanical zones; and description of traditional and current land and water use, subsistence practices, and cultural activities. Attention is paid to trails and transects; boundaries and buffer zones; hunting, fishing, and gathering areas; breeder zones and migration routes; and to sharing of traditional knowledge on natural phenomena, wind, rain, seasons, moon phases, and life cycles of biota and fauna.</td>
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<td>Engage in Visioning and Scenarios Design</td>
<td>Facilitated group processes search for a preferred future in spite of differences. The process is inter-generational and inter-gender, done with cultural sensitivity. Old-timers and new-comers share their knowledge and experience. Everyone is asked what they can do to take care of the place. Goals and objectives are identified. The focus is on dialogue and search for acceptable behaviors when values differ.</td>
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<td>Develop Alternative Strategies</td>
<td>Even a common vision may be attained with alternative strategies that need evaluation by local knowledge and external expertise. Stakeholders' mediation is initiated.</td>
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<td>Assess Impacts and Mitigation Measures</td>
<td>Assess impacts of proposed development alternatives on native people's access and use of resources for the pursuit of traditional cultural, religious, and natural resource gathering activities. Assess impacts on marine and terrestrial ecosystems and on traditional and contemporary aboriginal land use and cultural resources. Mitigation measures are identified. Details are worked out.</td>
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<tr>
<td>Select and Phase Strategies</td>
<td>Prioritization and phasing of strategies takes place among stakeholders.</td>
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<td>Documentation</td>
<td>Plan write up meets established formats to be accepted and funded. The document reflects cultural concerns of the project's beneficiaries who recognize the plan as their own. It contains legends and stories and a description of naive and local people's connection to the place and traditional and contemporary uses of local resources.</td>
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<td>Implementation</td>
<td>Cultural ways of doing things are realized with co-leadership, co-management arrangements, and participation by ethnic and indigenous groups. Partnerships and Memoranda of Agreement (MOA) among stakeholders are finalized. Rights and responsibilities are clarified. Culturally sensitive enforcement is carried out.</td>
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<tr>
<td>Monitoring and Evaluation</td>
<td>Co-management involves co-monitoring and co-evaluation.</td>
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**Culture and the Planning Process**

Planning is a product of a society's cultures. As culture guides people's values, decisions, and actions, cultural considerations should be a part of plan making, zoning, and land management. Jurisdictions have historic commissions, organize ethnic events, implement preservation and main street projects, or protect scenic districts and native sites.

Participatory techniques such as in-depth interviews, household surveys, focus groups, and design charrettes are venues where information can be collected on cultural concerns. Cultural input is greatly facilitated when people indigenous to a place and experts of traditional cultural practices are invited to participate in appropriate ways such as through indigenous councils, cultural commissions, or native boards. Cultural aspects can be considered at various level of planning, from the federal to local level. Sectoral plans and projects can be evaluated for their impact on cultures.

Cultural concerns can be addressed in all steps of a local planning process: goals and objectives formulation; community and local area characteristics and resource identification; visioning and scenarios design; evaluation of alternatives; impact mitigation; and management recommendations.

Attention should be paid to the viability of cultural and ethnic places during a planning process. For example, the
evaluation of cultural impacts from a primary corridor transportation project would include consulting with pertinent agencies and cultural experts on how to proceed, talking with ethnic informants, surveying sources for information on cultural practices, and conducting street surveys for evidence of practices and signs. Questions to address would include: Would the project change the character of the access to the resource and/or practice? Would the project alter the nature of the cultural practice itself? (PB Consulting and Norma Wong, December 2001).

**Moloka‘i Subsistence Practices Study**

In the case of indigenous peoples, one can expect them to give great attention to the cultural and spiritual meaning of natural events, ecological integrity, and biodiversity. Planners need to be open to policy and program suggestions for the protection of traditional subsistence practices and lifestyles.

For example, a multi-method approach was used on the island of Moloka‘i, Hawai‘i, to document the importance of traditional subsistence practices. A governor’s task force made up by the stakeholders, representing agencies, landowners, and Native Hawai’ian practitioners, was set up for the purpose, assisted by researchers of the university and a local NGO.

A random sample telephone survey provided baseline information on the relevance of subsistence among all ethnic groups. Focus groups were conducted in five communities with Native Hawai’ian practitioners of hunting, fishing, forest and medicinal plant gathering, ocean gathering, gardening, and animal raising in order to learn of problems, opportunities, and policy suggestions. A separate focus group was conducted with commercial fishers. Participatory GIS mapping concluded the focus groups by bringing a geographical dimension to what was discussed by pinpointing subsistence areas and sites to protect and to access for present and future generations (Matsuoka, McGregor, Minerbi, 1998).

Outcomes of the study included a report, education programs for environmental stewards, and pilot legislation to set up a community-based management system for a marine coastal sanctuary. This information was subsequently used by the Moloka‘i community to obtain a federal empowerment zone designation.

**Organization and Implementation Challenges**

Local planners often welcome suggestions on how to incorporate cultural considerations into planning. Much can be done on a discretionary basis, but legislative bodies may have to institutionalize the cultural aspect in planning (Office of Environmental Quality Control 1997). For example, when determining whether a project warrants a minor or major review process, minor projects may not require a cultural impact assessment.
Planners’ concerns for incorporating cultural impacts may include availability and training of staff in cultural resources, need to amend permit rules, extra expenses in incorporating a cultural assessment review component, difficulty in obtaining comments by native and cultural experts, and added time in the permit review process. These concerns can be resolved.

Partnership with the SHPO officer, the local university, the local archive (if one exists), indigenous tribes and groups, ethnic and historic organizations, and historic and cultural commissions greatly assists in making cultural data available in a permit application, plan making, and natural resource management.

Co-management approaches involving landowners (public and private), indigenous groups, community-based and environmental organizations, and regulatory agencies allow for the integrated protection of cultural resources and ecosystems in cultural districts and watershed areas.

Conclusion

Native and local cultural and ethnic expertise greatly improves the identification, protection, and management of cultural and historic resources. Historic and heritage organizations help to communicate to the general public native viewpoints on cultural assets.

Federal agencies and national cultural and historic organizations with their definitions, criteria, procedures, and expertise provide important guidelines and resources that, when properly adapted to local situations, help planners to incorporate and address cultural and historic assessment in their plan making and permit review processes for their jurisdictions.

Federal legislation such as those noted earlier and others, require some form of cultural impact assessment and efforts to mitigate adverse impacts; these tasks can be complied with for any major project. Some state courts have ruled that agencies must make their own assessment on cultural impacts and mitigation plans, and cannot simply delegate that responsibility to project proponents.

Co-management approaches mobilize resources to protect cultural and historic assets. It is desirable that area-wide information and data systems on cultural assets and cultural properties be collected in their own right for broader plan making purposes independently and before the permitting process.

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