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in this work—whether reform of the criminal justice system is possible, worthwhile, or consistent with the goals of decolonization (80-81). It is not fully clear what the author means in her use of this term (257, 259) or how suggested reforms push decolonization beyond a metaphor to include issues of land and Indigenous sovereignty, or the structural changes necessary to abolish institutions that maintain oppressive social relations. This analysis could have been foregrounded through a deeper engagement with the work of scholars cited within who engage more directly with these issues. Consequently, many of the suggestions offered, of better-resourced communities, drug or alcohol treatment services, and culturally and gender-appropriate programming, fall somewhat short (309–310). Her principled call for Canada and its institutions to be held accountable to various international human rights conventions also results in a proposal that the safety of Indigenous women be ensured at sentencing, including through the crafting of innovative sanctions (296). Without wanting to be dismissive, the book's focus remains on improving the experiences of Indigenous women and their communities within a colonial system, or on dealing with its effects, rather than solutions aimed at their cause—the historical and material relations of settler colonialism, which the criminal justice system and the state are centrally implicated in reinforcing.

Overall, this is an important work of primary use to those engaged in the field of law and criminal justice, and those seeking to understand the intricacies of how Indigenous women are victimized and criminalized within these systems. It is a dense study, which is a strength, but also what makes it somewhat inaccessible to a non-specialized audience. Though highly critical, it may have missed an opportunity to put forward a more urgent call for the deincarceration of all Indigenous peoples, by highlighting the transformative change necessary to support Indigenous struggles against genocide.

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Many Nations under Many Gods: Public Land Management and American Indian Sacred Sites. By Todd Allin Morman. Norman: University of Oklahoma Press, 2018. \$39.95 cloth.

Todd A. Morman's *Many Nations under Many Gods* provides a valuable comparative anthology that illuminates key issues in Native American tribes' battles for self-determination and that protection of sacred sites is an integral part of that fight. Morman, who has a JD and a PhD in history and has worked as a staff attorney for Anishinabe Legal Services and the Nevada Legal Services Indian Law Project, uses case studies from recent decades to critically review the actions of federal courts, federal legislation, and federal agencies regarding protection of Native American sacred sites.

The author is frank and forthcoming with his perspectives. Regarding the history of federal government actions, for example, he states that the United States has been "a racial dictatorship for centuries" (205). His language throughout shows he

is an advocate of Native American sovereignty, and he does not pull punches when describing racist opponents of tribal interests. Nonetheless, he sees a productive transformation: although he assesses recent federal courts as becoming increasing "markedly anti-Indian" (44), he sees both legislative and administrative branches of the federal government as becoming more inclined to listen to Native viewpoints and potentially to seek resolution and accommodation. This derives, he argues, from increasing public awareness of the history of cultural and physical oppression of Native peoples, and more widespread respect for Native traditions and practices. Morman sees cultural education as a key force for change.

The key theme emphasized in the book is the power of consultation between tribal and agency representatives, and of negotiated discussions among contending users. The author writes, for example, that "Under the right circumstances, when federal administrators do not have a preconceived agenda, the consultation process can potentially produce agreements that protect Indian sacred and cultural sites" (136). This is faint praise, but the cases do demonstrate genuine shifts in decision-making attributable to the consultation processes.

Three chapters analyze on cases where tribes' aims were contested by the Forest Service and private parties. The first focuses on Hopi efforts to protect Nuvatukyaovi (San Francisco Peaks) from expanded use by the Arizona Snowbowl Resort; the second case concerns Washoe efforts to protect Cave Rock from climbers and preserve its sacred use; and the third reviews Blackfeet protection of Badger Two-Medicine sacred sites from disruptive recreational use by others while ensuring access to tribal members. Each extended case sketches the cultural and political history of the tribe, and it also summarizes the contesting uses of the sacred site in question. The historical sketches are brief, but afford some comparison across the Native nations of the impacts of federal policies like the forced removal of children to residential schools, allotment policies, and the Indian Reorganization Act.

While Morman draws on the existing major publications on these cases, bringing the cases together defines the larger picture. We better understand core concepts in legal and administrative decisions, and we see the larger patterns in US policy and administration. "Religious freedom" is only a part of the picture. In the Hopi case, for example, we learn that the courts have determined that others' potentially disruptive use of a sacred site can be curtailed only if there is a "substantial burden" placed on religious practice. Moreover, this can be mitigated if there is another "compelling" interest. The courts took a very "narrow reading" of the burden in this case, noting the development would have an adverse impact, but not "substantial" in their view, and ruled in favor of the Arizona Snowbowl Resort.

We see the concept of "substantial burden" operating in other cases, but ultimately not being decisive. In other cases, cultural considerations are foregrounded, and consultation plays a stronger role. In the Washoe case, some climbers who initially fought the tribe to obtain unrestricted climbing access decided to support a ban when they better understood Washoe perspectives. The Forest Service found that the Cave Rock site has significant cultural interest to multiple parties and the site was protected as a "traditional cultural property." The Blackfeet case was resolved in part because the tribe

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agreed to open other areas for snowmobile use, and because of a Forest Service travel management plan that cited numerous secular reasons for decisions. This reasoning led a federal court to determine that the plan did not "improperly establish religion," another key concept.

Morman then moves to five shorter cases involving federal agencies other than the Forest Service. Here, importantly, more attention is given to the public campaigns of anti-Indian groups, not only those of contending users. The cases here include Makah whaling; two Quechan cases, one involving mining and the other a solar collection project; the Apache fight over copper mining; and the Standing Rock Sioux fight against the Dakota Access Pipeline (DAPL). In the first three of these cases, we see the power of environmentalists either in strong opposition or of support to tribes. In the fourth we see the power of corporate interests: the extent that the site was privatized caused removal of Native sacred land from the possibility of protection by a federal agency. And in the fifth, probably *very* familiar to every interested reader, we see not only the power of development interests, but the power of the US president to change the direction and timing of administrative decision-making.

These cases lead to a larger discussion of sovereignty, where Morman explores strategies and theories intended to bolster tribes' protection of sacred sites. Here are summarized various works on legal arguments, lobbying, legislation, and appeal to international law. Even more radical are ideas about reformulating the government-to-government relations between tribes and the US government. In the middle ground are ideas for comanagement of resources. But, Morman concedes, "The core problem is the lack of recognized Indian political authority, or sovereignty, over sacred sites" (187).

Morman concludes by renewing his emphasis on consultation and the importance of education. He repeats the idea he has stated earlier, that the larger public needs to know that the category "Indian" is like the category "European," in that there is no unified history or single culture that can be ascribed to all the people in the category. And he reminds us that "genocide" in the context of European history did not mean killing everyone, but rather a targeted practice, as it was for some Native Americans more than others. The need for culturally specific understanding and for place-specific consideration is a centerpiece to the structure of this book. And simple as this is, it is a powerful need.

Published in 2018, the book's optimism about federal agencies' responsiveness may reflect that it was mostly written before 2017, despite its reference to two of President Trump's actions in 2017that impacted tribes, reduction of Bears Ears National Monument and direction to the Army Corps of Engineers to hasten their approval of the Dakota Access Pipeline. Although a few years is a blink in time compared to Native American histories, this reader suggests that celebration of federal administration must be more muted today.

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