United States Department of the Interior National Park Service

# National Register of Historic Places Registration Form

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This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, How to Complete the National Register of Historic Places Registration Form. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional certification comments, entries, and narrative items on continuation sheets if needed (NPS Form 10-900a).

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## 1. Name of Property

historic name Tuzigoot Museum

other names/site number Tuzigoot National Monument Museum and Visitor Center

#### 2. Location

street	& num	ber Alternate	US 89A H	ighway	and Tuzig	oot Road			not for publication
city or	town	Clarkdale					1		vicinity
state	Arizo	na	code	AZ	county	Yavapai	code	025	_ zip code 86324

## 3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this X nomination \_\_\_\_ request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property **x** meets <u>does</u> does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

statewide local nation Date fying official Signature State or Federal agency/bureau or Tribal Government Title In my opinion, the property \_\_\_\_ meets \_\_\_\_ does not meet the National Register criteria. Date Signature of commenting official State or Federal agency/bureau or Tribal Government Title 4. National Park Service Certification I, hereby, certify that this property is: entered in the National Register determined eligible for the National Register removed from the National Register determined not eligible for the National Register other (explain:) 9-9-18 Signature of the Keeper Date of Action

Tuzigoot Museum Name of Property			Yavapai, AZ County and State		
5. Classification			- Charles		
Ownership of Property (Check as many boxes as apply) private public - Local public - State X public - Federal	Category of Property (Check only one box) X building(s) district site X Structure (walls) object		ources within Properiously listed resources in the Noncontributing		
Name of related multiple pro (Enter "N/A" if property is not part of a		Number of con listed in the Na	tributing resources tional Register	previous	
				previous	
(Enter "N/A" if property is not part of a N/A			tional Register	previous	
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(Enter "N/A" if property is not part of a N/A 6. Function or Use Historic Functions	multiple property listing)	listed in the Na Current Function (Enter categories from	tional Register N/A	previous	
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2

walls: Sandstone and Cement Tile

Stucco

Rubber

roof:

other:

Yavapai, AZ County and State

# **Narrative Description**

(Describe the historic and current physical appearance of the property. Explain contributing and noncontributing resources if necessary. Begin with **a summary paragraph** that briefly describes the general characteristics of the property, such as its location, setting, size, and significant features.)

## **Summary Paragraph**

Set on an elongated ridge that is located in a small valley formed by the Verde River, the stone masonry Tuzigoot Museum was constructed in 1935-1936 near the center of the ridge at a lower elevation than the Southern Sinagua village archeological site that crowns the southern apex of the ridge. The museum's long façade faces nominally west, at a 15 degree angle east of true north. To the north of the museum and lower in elevation is a Mission 66 housing development from the 1960s that is not part of this nomination. However, directly to the south and east of the museum is a garage building facing true north. A curvilinear retaining wall extends from the northeast corner of the garage and along the nominal east elevation of the museum along the escarpment of the mesa. It provides a level terrace for the museum. A 1952 pump house is located below the wall near the northeast corner of the museum. These four resources are listed as part of Tuzigoot National Monument's List of Classified Structures and are the subject of this nomination. A lower retaining wall, included in this nomination, extends across the nominal west façade of the museum separating it from the two-level parking lot that was also a Mission 66 project. Arizona cypress planted in the 1950s extend along the top of the west retaining wall masking much of the façade of the museum.

The Works Progress Administration (WPA) funded Tuzigoot Museum is a one-story, irregularly planned building that was designed and built to reflect Puebloan style masonry of the nearby Tuzigoot Ruin. The jagged parapet masks a low pitched, nearly flat roof over a truss system. Door and window openings have wooden lintels set into the stone masonry that is a veneer applied over cement tile. The building originally housed the museum and a custodial residence on the south end separated by a connecting structure housing an office and storeroom. Presently, the residence has been converted to additional office space, a conference room, and an employee break room. Notably, the interior of the museum has a log viga and willow latia ceiling supported on three log columns. A large fireplace is on the west wall. All walls are plastered, though the original storeroom and adjacent utility room has exposed cement tile block. The museum retains original wooden display cabinets with glass tops allowing artifacts from the ruin to be viewed from the top. The cabinets are original fixtures of the museum having been built specifically for it in a modern style. The one-story Puebloan style garage was built after the museum and mimics its style. In 1968 a one story flat roofed comfort station was built into the northeast corner of the museum. It was designed in a compatible style and was part of the Parkscape program that followed the Mission 66 construction program from 1966 to 1972

### **Narrative Description**

Site: The museum is sited on a mesa that rises from the east end of a dell formed by the Verde River north of the present watercourse. A double oxbow of the river formed the valley. To the northwest, Pecks Lake defines the northern oxbow. The southern oxbow has been obliterated by former tailing ponds part of old mining operations and located west of the ridge. To the east of Tuzigoot ridge is the Tavasci Marsh formed by the drainage of Shea Springs and Pecks Lake. To the north and east of the ridge the terrain rises nearly 200 feet to the Coconino National Forest where the slope rises an additional 200 feet. Similarly the terrain rises sharply west and south of Pecks Lake where the original course edged the escarpment. Further west of the present course of the Verde River, is the town site of Clarksdale that extends to the river. Rough terrain extends south of the river that flows northwest to the southwest to a small oxbow south of the Tuzigoot ridge. The river then flows south and east through a riparian environment between the south and east escarpments. The Tuzigoot ridge, extending lineally north and south, rises to its apex at its southern end approximately 3450 feet above sea level upon which is located the Tuzigoot ruin archeological site. Extending northward, the ridge slopes downward to the valley floor.

(See Continuation Sheets)

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## Narrative Description (continued)

Located in the center of the ridge, at approximately 3410 feet in altitude, the museum is connected to US Alternate 89 by the paved Tuzigoot Road that descends to the Verde River, crosses it, cuts through the tailing ponds site, and continues easterly before curving up to the park's entrance. The roadway, realigned and reconstructed in 1964, connects to the upper and lower parking areas west of the museum. A secondary roadway extends north from the entrance drive and provides access to the employee housing area and staff office. The two parking areas contain parking spaces along the east and west sides. A concrete stairway provides pedestrian access between the parking areas and is aligned with a concrete stairway that bisects the west random ashlar sandstone masonry retaining wall that extends north and south beyond the west facade of the museum. The concrete capped retaining wall roughly parallels the museum and then angles at the north and south ends. Beyond the south end the wall angles sharply turning west forming a retaining wall along vehicular access to the museum and garage. The graveled access also parallels a retaining wall that curves around to the garage forming an areaway along west east elevation. This wall is pierced to accommodate the concrete paved walkway extending up the slope to the Tuzigoot archeological site at the apex of the ridge.

Aligned with the west façade of the museum, the west retaining wall forms podia enclosing a five-step stairway constructed of concrete and extends to the west walkway extending along the façade. Metal handrails are located at each side of the stairway and the top of the podia that, like the retaining wall, rises approximately one foot above grade. The flagstone paved west walkway set back from the retaining wall connects to the concrete walkway that crosses the south vehicular access and extends to the archeological site.

The upper parking area, built in 1964, is arced to correspond with the faceted angles of the west retaining wall. Nearest the museum, the parking is diagonal at a concrete walkway connecting to the original stairway to the museum entrance. The walkway extends northerly along the retaining wall and then curves around the north end to connect with upper walkway extending along the façade. This provides a handicap accessible approach to the museum and forms a Y-shaped configuration for access to the residential-office area. Across the parking area, the west side has parallel parking. At the north, the driveway curves down to the rectangular lower parking area built later than the upper parking area, though designed at the same time. It has diagonal parking on both sides of the driveway that connects back to the entrance roadway. A concrete walkway extends the length of the east side with a "Y" walkway connecting to a concrete stairway to the upper parking area and aligned with the original stairway through the retaining wall to the museum entrance. All concrete walkways are tinted a light terra cotta in color. The entire parking area and entrance roadways were regraded and constructed as part of

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the 1964 construction as which time the old roadways were removed and obliterated. Originally parking was along the base of the west retaining wall that is now used as a planting area.

Vegetation in the area is typical of an arid environment above riparian lowlands including desert willow, ocotillo, mesquite and salt bush. Four large Arizona cypress, a native species of tree planted in the 1950s, mask the west façade of the museum adjacent to the building and along the top of the west retaining wall and in front of the flagstone paved walkway that extends across the façade connecting the north comfort station and the trail to the archeological site at the apex of the ridge. An original flagstone paved walkway extends across the west façade of the museum and connects to modern flagstone paved walkways extending to the comfort station. The area south of the museum is graveled. A gravel surface extends around the east elevation of the museum connecting the entrance to the enclosed east porch and to a stoop at a doorway into the east storeroom of the connecting building between the museum and the original residence. Natural ground cover extends around the museum along the east and north elevations. At the west façade, the projecting main entrance porch into the museum has been modified on the south elevation with an accessible ramp and a modern flagstone walkway connecting to the original walkway. Two original concrete steps extend from the west entranceway of the porch to the flagstone paved walkway.

#### Museum

The one-story, stone masonry Pueblo style museum has an irregular, somewhat lineal plan with a large museum space originally opening into having a northeast wing. To the south, two rooms and a mechanical room connect the original residence on the south end of the building. The custodial living guarters were a one-bedroom, one-bathroom apartment with separate kitchen and living room spaces. Access was from a screened porch at the southwest corner. The long facade of the museum faces nominally to the west, though it angles approximately 15 degrees east of true north. The somewhat flat roof carried on a truss system hidden behind parapets that characterize the Pueblo style with a jagged parapet suggesting the archeological ruin. The parapets, usually near the corners, are pierced with scuppers lined with red sandstone flags to drain the roof. Vents for the attic space within the truss system are located further down the walls and flagstone lintels. The projecting concrete footing forming the water table is faced with stone. As originally designed, the facade entry porch had a stepped down wall extending north that was designed to further enhance the "ruins" appearance; this was never constructed. Windows and doorways have half-log pole wooden lintels over the openings that mask wooden structural components; the lintels extend well beyond the jams into the masonry veneer. Thick sills of precast concrete are painted dark brown to match the color of the wooden frames. Pairs of windows typically have stone masonry mullions set on the sills and are spanned with the log pole lintels. The window openings are randomly placed and sized to enhance the irregularities typical of the Puebloan style. Wooden sash are variously six-over-six-light, double-hung in

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larger openings, three-over-three-light in smaller double-hung openings, and six-light casements in small openings. Two-over-two-light, double hung sash open to a small interior space. The stone masonry walls of the museum are veneer over cement tile. The masonry veneer is composed of random ashlar sandstone quarried locally or collected from the ruin. The stone masonry is interspersed with rounded river-washed sandstone frequently more reddish in color giving the walls a uniform texture enhanced by reddish mortar.

The west facade of the large rectangular museum block extends from the 1968 comfort station in the northwest corner to the recessed two-room structure connecting to the south residential wing. An enclosed entrance porch projects from the museum block's facade that is defined by its higher parapet. The porch is located near the south end of the block and is constructed entirely of stone masonry matching the masonry veneer of the main structure. Lower in height, the porch has a west entrance that is designed to reflect a traditional Puebloan style T-shaped doorway with a wide head and narrow sill suggesting the doorways of the nearby Montezuma Castle. The doorway is two steps above grade. A sign, "Visitor Center," hangs from the lintel over the doorway. Two openings were located at each side elevation of the porch. The north opening without any trim remains unchanged; the south opening has been cut down to form a second T-shaped doorway providing access from the curving sandstone paved ramp from the sandstone paved walkway extending across the façade.

Random window openings characterize the west façade of the main museum block. Near the northwest corner is a small window with a six-light sash. A pair of window openings with double hung, six-over-six light sash is located near the porch. A similar pair of windows is located on the west wall within the enclosed porch to the north of the main front entranceway. The entranceway and the west porch entrance are aligned. The very wide entrance door is constructed, front and back, of vertical tongue and groove boards and has three decorative strap hinges painted black that correspond to the door's actual hinges. To the south of the enclosed entry porch is a small window opening containing six-light sash and set high on the wall. A screen door with horizontal panels is set into the doorway and currently has Plexiglass inserts in the openings.

The museum block opens to the two-room and utility room connecting structure that is set back from the facade. Two window openings are located on the connecting structure. Nearest the museum block is a large opening with six-light, double hung sash. A pair of small six-light sash fills the adjacent opening; the head is lower than the larger opening. Stepped back further from the museum block and the connecting structure is the residential wing a step up from main structure. Its west façade has two window openings with uniform heads. The north opening, lighting the bathroom, contains over-scaled two-over-two-light, double-hung sash. The southern window opening contains six-over-six-light, double-hung sash. Two pairs of double-hung sash with six-over-six-light sash are set in the south elevation.

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A porch extends across the east elevation of the residential wing that was originally an enclosed kitchen porch and an adjacent screened porch at the east entrance into the former residence. The porch is constructed entirely of stone masonry. The south elevation of the former screened porch has a modern door, with four horizontal glazed panels, set into the original opening that has been reduced in size with vertical boards. The doorway opens onto a flagstone pad. Above, the south half-gable of the shed roof curves up to the parapet of the residential wing. The screened porch window openings of the east elevation have been infilled with aluminum framed sliding sash. Typically the pair of window openings have stone masonry mullions. At the enclosed kitchen porch, tall fixed panes fill the pair of window opening having a log mullion. Within the porch structure, the east wall of the residential wing has a five-across panel door opening to the former living room that also has a window opening with three-over-three-light sash. The kitchen has a glazed door with three lower panels. Continuing around the east porch at its north elevation is a doorway with a hollow core door above two concrete steps. The north shed roof is also masked by a curved parapet extending to the residential wing's parapet.

A pair of six-light sash is set into the north wall of the residence wing lighting the kitchen. A single doorway and solid core door is located on the east wall of the connecting structure within an alcove infilled with a concrete stoop that provides access to a flagstone paved walkway that connects to the north kitchen porch door. The solid core door is fronted with a screen door having a large open panel above three horizontal panels.

The main museum block extends onto the east elevation of the connecting structure incorporating what is now a small utility room, originally public toilet rooms. This corner structure, which has a stepped parapet up to the higher parapet of the museum, has a single window opening with three-over-three-light, double-hung sash. The museum block has three pairs of window openings each with six-light sash; all are set high in the walling. A projecting firebox and chimney stack is set between the northern pairs of openings. The firebox has sloped shoulders that merge into the chimney stack extending above the parapet. The northeast museum wing projects from the corner and has a pair of six-light sash openings on the east and north elevations. The latter openings have been boarded over to accommodate an exhibit in the interior of the museum.

Projecting from the northwest corner of the museum is the semi-detached one-story, flat roofed 1968 comfort station that is a stuccoed frame structure with stone veneer forming a low dado around the structure. All the walls of the comfort station are battered. The flat roof has substantial overhangs and extends from the comfort station anchoring into the angle of the north wall of the museum and the west wall of the northeast projecting museum wing. The exposed rafters support roof decking and extend over the covered loggia areaway that is paved with flagstone. Beams, two over the comfort station and a third is above a pair of log columns at the

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entrance into the loggia areaway. The eaves of the flat roof have a stepped fascia. Two skylights pierce the roof. The east and west elevations of the northeast museum wing have no openings. Awning windows with no trim flank a central louvered area on the north elevation. At the south elevation opening into the loggia areaway are three doorways into the men's and women's restrooms and the central utility room. All are set into the battered walls and have tapered rounded jambs. The doors are vertical boards applied to solid core doors

The north elevation of the museum within the loggia areaway originally had two window openings that have been converted to a doorway providing a secondary exit from the museum and access to the public comfort station. The masonry opening was cut down and narrowed to accommodate a doorway with a vertical board door matching the comfort station doorways. An angled, low stone masonry wall extending from near the museum corner and has a modern drinking fountain is integrated into the wall. A similar low stone wall extends from the south corner of the comfort station to the log column enclosing the loggia areaway that separates the structures and opens through the north elevation at grade. An extension of the west flagstone paved walkway extends to the loggia areaway. From it, the concrete accessible walkway curves out to parallel with the west elevation of the comfort station.

## **Museum Interior**

The museum interior is the primary space of the building and is characterized by plastered walls typical of most of the spaces except for the east spaces of the connecting structure where the walls are painted over the cement tile. The utility room's cement tile walls are unpainted. Throughout the window openings are untrimmed. Within the carpeted museum space, a Puebloan style ceiling has large log vigas spanning across the room from east to west. These support smaller poles extending the length of the room and carry willow latias masking the underside of the roof truss system. A log beam runs longitudinally through the space perpendicular to the vigas and is supported on three log columns in the center of the room all parallel with west and east walls. Original square light fixtures are recessed into the willow latias. The ceiling system is sloped over the northwest wing that is now divided into two spaces that includes a store room and an enclosed exhibit that dates from the late 1960s depicting a room in a Southern Sinagua pueblo. The exhibit is raised on a platform and faced with stone masonry having a jagged rough opening for viewing. The storeroom has wooden cabinets along the east wall that were once in the main museum space for object storage. The cabinets have glazed doors in nine pairs above lower glazed cabinets. The 1960s remodeling of the northeast wing included enclosing the storeroom with a modern partition and door.

A large fireplace is asymmetrically located on the east wall. The chimney breast at each side is buttressed by two-step podia at each side. The chimney piece tapers from the rounded sides with pendentive-like forms to the tapered section over the firebox forming a rounded hood. The

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firebox is set with a black painted metal insert above a tiled hearth. Above the firebox is a circular medallion with a traditional mask symbol in it obscured by a National Park Service arrowhead wooden sign. The chimney breast has now been painted a uniform color of beige slightly darker that the beige walls. The rounding of the chimney breast gives it a somewhat Southwest style suggesting a *huernos*.

The original exhibit cases in the museum, installed after the museum was constructed, are a simple, modern design. Each walnut case has square-section straight legs with a lower shelf forming the base. A twisted wrought iron bar, set between the front legs, was designed to protect pots set on the shelf. The legs extend above the shallow display boxes and support glass front and side panels within frames. A glass top without a frame is supported on the top framework and the top of the legs. The viewer must lean forward to see artifacts set into the shallow boxes on a canted or flat shelf enclosed by the glazing. Some original furniture, such as side chairs remain. The dark stained frames are carved to reflect rustic Spanish Colonial style furnishings and have woven leather seats. Similar furnishings including a desk and credenza remain in the southwest corner office.

On the south wall of the museum, two original doorways near the east wall were completely removed when the 1968 comfort station was built replacing the interior restroom that had been enlarged in the 1950s. This space is now infilled with modern book and display shelves. One untrimmed doorway near the west wall remains and provides access to the office in the connecting structure located behind a modern information desk with a paneled front. Originally, the residential wing was only accessed from the east porch. After the 1960s construction of Mission 66 housing in the park, the residence was converted to additional office and staff spaces. A doorway was cut through from the office into the residence spaces through part of the original bathroom space and closet area. The residential area is a step higher than the floor level of the museum to provide a wooden floor system. An office was installed into the former bedroom. The living room is currently used as a conference room and the kitchen is used for a staff break room. All the interiors spaces are plastered except the storeroom and the utility room. The ceilings are plastered. Board trim remains on original doorways that typically have five-across panel doors. Altered doorways are untrimmed. Throughout the museum, office area, and former residential wing the windows have curved plaster jams and heads and wooden sills.

### Garage

The garage, located to the southeast of the museum and aligned north and south, is a onestory, slightly pitched roof structure built after the museum was constructed. Built on a concrete slab in the Puebloan style, the stone masonry exterior is similar to the museum, but with a flatter parapet, rudimentary corner quoining, and somewhat wider pointing. Two roof drain canales

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are on the east elevation. It is set into a terraced area cut into the side of the mesa. An areaway extends between the west elevation and a stone masonry retaining wall and opens to the south elevation and a secondary trail to the ruins on the apex of the mesa. The east elevation rises from the escarpment of the mesa and is inaccessible. The façade, with a single garage door opening, faces north. It has two courses of stone masonry that mask the beam over the doorway. The doors are tongue and groove board with "Z" battens on the interior. An access door is located in the western leaf. Each side elevation has a single window opening and two are located on the south elevation. The west opening is boarded and others have six-light sash awning sash set into rough masonry openings. The heads are soldier coursed and the sills are a concrete cap over masonry.

The garage is one large room opening from north doors. A south storage room has stubbed-off plumbing for a restroom. A west doorway, near the south end originally provided access to the restroom facility, is infilled with newer masonry. The interior walls are plastered above a concrete floor.

## East Retaining Wall

The east, cobblestone masonry retaining wall, set typically with a concrete cap, extends from the northeast corner of the garage and edges the escarpment following the contour giving it a curvilinear plan for approximately 195 feet. It extends down slope from three to ten feet and is battered. The wall, built along with the museum, rises above the ground level of the garage approach and the east elevation of the museum forming a protective wall approximately three feet high; the top is uneven to suggesting crenellations. From the garage the wall undulates, with buttress curves and battered construction, turning somewhat northeast behind the residence wing of the museum and then parallels the east elevation of the museum wing in a wide curve at the north end. A flagstone stairway curves down the wall to the pump house built below and against the wall.

#### Pump House

The pump house, built in 1952 against the east retaining wall, is a small cobblestone masonry building with a flat roof. It is constructed of river cobbles and cut stone with red mortar on a concrete slab floor. The wooden roof structure with roll roofing is slightly sloped to drain and has a roof hatch in the center. An access doorway is on the east elevation and has a metal door. A smaller stone masonry of similar construction is adjacent to the north. The roofless enclosure is infilled with gravel and soil over a former water storage tank at the northern end and extends into the pump house. This holding tank is no longer used and water is now stored in a new tank, located to the northwest of the museum site, and constructed into the east slope

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of the ridge. The interior of the pump house also contains a chlorination tank in the center of the space.

## Alterations

The three buildings and the structure listed on the Tuzigoot National Monument List of Classified structures retain remarkable integrity relating to the construction begun in 1935. While the alterations before 1968 were minimal, the most notable addition was the construction of the comfort station built into the northwest alcove of the museum. The comfort station, designed in a compatible style reflecting Southwestern architecture, a significant structure in its own right, while it brought the Tuzigoot Museum to the standard of a Mission 66 visitor center. Before its construction the interior was altered with the enclosing of the northeast wing creating a storeroom and the Southern Sinagua room display with its stone masonry façade opening into the museum space. At approximately the same time, the former custodial residence was opened directly to the museum office and the spaces were incorporated further enhancing the new visitor center conversion completed with the addition of the comfort station. In the recent past, the museum was repointed by park employee Ruben Ramirez. The exposed elevations lost most of their pink mortar, particularly at the east elevation.

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# 8. Statement of Significance

## **Applicable National Register Criteria**

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing)

х	A
	-

X

Property is associated with events that have made a significant contribution to the broad patterns of our history.

- B Property is associated with the lives of persons significant in our past.
- C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.

D Property has yielded, or is likely to yield, information important in prehistory or history.

Areas of Significance

(Enter categories from instructions)

Entertainment/Recreation

#### Community Planning and Development

Architecture

#### **Period of Significance**

1935-1968

#### **Significant Dates**

1935-1936; 1968

#### **Criteria Considerations**

(Mark "x" in all the boxes that apply)

Property is:

- Owned by a religious institution or used for religious purposes.

   B
   removed from its original location.

   C
   a birthplace or grave.

   D
   a cemetery.

   E
   a reconstructed building, object, or structure.
  - F a commemorative property.
  - X G less than 50 years old or achieving significance within the past 50 years.

Cultural Affiliation

Significant Person

(Complete only if Criterion B is marked above)

Architect/Builder

"W. R.," 1935

Milton Swatek, 1968

## Period of Significance (justification)

The period of significance represents the initial construction date of the Tuzigoot Museum through construction of the 1968 comfort station northwest of the original building.

#### Criteria Considerations (explanation, if necessary)

Criterion G applies because the comfort station addition is less than 50 years old. It is significant for its association with the National Park Service's Mission 66 and Parkscape programs where the comfort station addition updated the original building into a "visitor center" with the requisite visitor services within one building. It is also significant for its use of ethnic design to integrate it into the original building.

Tuzigoot Museum Name of Property Yavapai, AZ County and State

# Statement of Significance Summary Paragraph (provide a summary paragraph that includes level of significance and applicable criteria)

The construction of the Tuzigoot Museum, Tuzigoot National Monument, is significant under criterion "A" as a state significant example of a Works Progress Administration funded project from 1935-1936. It is also significant for its stone masonry Puebloan style architecture under criterion "C" giving it state significance in relationship to National Park Service architecture. Since, the comfort station addition is less than 50 years old, criterion "G" applies because of its exceptional significance with regards to the architecture of the comfort station addition and its importance within the Park Service's Mission 66 era between 1967 and 1972.

# Narrative Statement of Significance (provide at least one paragraph for each area of significance)

The construction of the Tuzigoot Museum, Tuzigoot National Monument, is significant under criterion "A" as a state significant example of a Works Progress Administration funded project from 1935-1936, predating acquisition by the National Park Service in 1939. Construction of the museum, following several seasons of archeological digs at the site, was promoted locally to house the artifacts and display them to the public as an early example of heritage tourism. Thus, the museum relates to the areas of significance of entertainment and recreation as well as community planning and development.

The Puebloan style architecture of the Tuzigoot Museum, probably designed by a National Park Service architect located in one the State Park Program offices, remains as a unique stone masonry example of the style in a National Park. As such it meets criterion "C" for its architecture and because of its use of materials it is of state significance in relationship to National Park Service architectural history.

Since, the comfort station addition is less than 50 years old, criterion "G" applies because of its exceptional significance with regards to its architecture. It represents the latter years of the Mission 66 program and the succeeding Parkscape Program that followed it between 1967 and 1972. Within the National Park Service the Mission 66 era is nominally dated between 1945 through 1972, representing the advent of modernist architecture in the parks. The Tuzigoot Museum was renamed the Tuzigoot Visitor Center during this era based on the construction of the comfort station and conversion of the former residential apartment to offices meeting the contextual criteria established for visitor centers. Tuzigoot Visitor Center's comfort station is one of the rare examples of new construction from the era as it was designed to be compatible with the existing architecture of the Tuzigoot Museum.

## Developmental history/additional historic context information (if appropriate)

The Tuzigoot Museum was designed, probably by a National Park Service architect, who may have been working for the Park Service's State Park Program that was established as part of the Works Progress Administration (WPA) to provide assistance to local public entities within the states. Five sheets of construction drawings were prepared for the building that are dated December 17, 1935, and signed "W. R." The drawings note that it was a Works Progress Administration project, possibly originating from the Oklahoma City office, headquarters for District III, which existed until the late 1930s serving southwestern states. The drawings indicate that the WPA project was "W. P. 59, P. No. 65-2-391, T. W. S. 1136." The architect's full name remains unknown.

Nevertheless, the museum at Tuzigoot, named for the Apache word for "crooked water," was the culmination of several Civil Works Administration and WPA funded projects that were begun as archeological excavations as early as October of 1933 under the direction of Dr. Byron Cummings of the University of Arizona. This project was under the auspices of Grace Sparks, the chairperson of the Yavapai County CWA Projects Committee, who was diligent in securing funds for economic recovery in the county. On November 29, 1934, it was reported that CWA activity within Yavapai County included over 34,000 man-hours and over \$25,000 in costs. Following the advent of the WPA program on July 31, 1935, eventually nearly \$38,000 was expended on county projects including those at Tuzigoot where archeological excavations continued. A large collection of artifacts were amassed that required conservation, storage, and eventually display. At first the curatorial operations took place in a vacant grocery store in Clarkdale that ultimately became a temporary museum until the construction of the Tuzigoot Museum that commenced late in 1935 when the foundations were poured in place. Construction continued through 1936.

(See continuation sheets)

(Expires 5/31/2012)

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# National Register of Historic Places Continuation Sheet

Tuzigoot Museum
Yavapai, AZ

Name of Multiple Property Listing (If applicable)

Section 8, page 1

#### Statement of Significance (continued)

In 1935, Chief Naturalist for the National Park Service, Ansel Hall, reviewed the drawings and made comments in the form of a revised plan of the interior museum space dividing it into a series a topic specific rooms. Though his ideas were not carried out, the plans were modified during construction eliminating the stepped wall that was to extend north from the northwest corner of the enclosed front porch. Other changes included adjustments to windows location and raising the height of the east porch integrating it more into the parapet of the residential wing. Following construction of the museum, the garage and east retaining wall were built, though there are no surviving construction documents for either. The museum, itself, displays all of the attributes described by the National Park Service's WPA report of 1937 where author Edward Nickel wrote that there are six attributes of rustic architecture suitable for the National Parks. He wrote that the buildings should be in harmony with the natural surroundings; should be related in any one area; should have horizontal lines; should have appropriate scaled materials; should be somewhat over scaled in relation to surroundings so as not be dwarfed by natural features; and, should avoid straight lines to create a feeling of "pioneer craftsmen."

After Tuzigoot National Monument was established July 25, 1939, few changes were made to the museum other than repainting and rearranging the museum cases. The cases were noted in the superintendent's report to have originally stuck out from the walls and they were placed against the walls, thus beginning the history of moving the museum display cases. The superintendent went on to note that the skeletal material on display "...is the most attractive to the visitors." In1940 the east wall was stabilized and restored in August followed by repairs to the furnace that exploded in November.

Immediately after World War II, the Park Service considered remodeling the museum and Park Service Architect Lyle Bennett designed a new "Administration Museum Building" dated June 12, 1946. He utilized most of the original structure and added a pitched roof. A 1951 "Museum Prospectus" proposed opening the building up with a bank of windows on the east side overlooking the below marsh. The pump house was constructed in 1952 to help provide a reliable water system for the museum and residence. No substantial alterations to the museum were completed until 1963 when a second restroom was built into the storeroom adjacent to the original restroom facility. A new privacy partition was constructed into the museum space. A new information desk was designed and installed in 1963. All of the interior restroom construction, the partition and entrance doorways were removed in 1968 when the new comfort station was constructed into the northwest alcove of the original museum. The comfort station was designed by Milton Swatek an architect with the San Francisco Planning and Service Center successor to the Western Office of Design and Construction that was responsible for the construction of the new parking areas in 1964 through the Division of Landscape Architecture.

(Expires 5/31/2012)

United States Department of the Interior National Park Service

# National Register of Historic Places Continuation Sheet

County and State	Yavapai, AZ

After the completion of new Mission 66 residences in the park in 1964-1965, the former custodian's residence was converted to office space and the northeast wing was enclosed for the Southern Sinagua Room display and a storeroom, for which no drawings seem to exist. These alterations converted the Tuzigoot Museum into a Mission 66 visitor center. The roof was repaired in 1966 and the museum's roof was completely resurfaced with a rubber membrane in 2005.

The history of the construction of the Tuzigoot Museum was part of a larger concept put together by Grace Sparkes of Prescott, Arizona, to promote jobs and tourism to Yavapai County. She was the local Chamber of Commerce Secretary and ultimately became the chairperson of the Yavapai County Civil Works Administration (CWA) Projects Committee. She was a diligent promoter of what is now considered to be heritage tourism. The first cultural project was the creation of an Archeological Committee to preserve the archeology of the county. With county notables such as Sharlott M. Hall and Kate T. Cory the committee supported the excavation of sites on the King's Ranch north of Prescott and other sites in 1931-1932. Simultaneously, a museum was planned to house excavated artifacts through the Smoki group of Prescott. The Smoki were a group of Prescott businessmen, who dressed as Hopi Indians and performed dance programs. Grace Sparkes helped secure federal funding through the CWA program to build a museum. The Smoki Museum, a Puebloan style building, was completed and opened May 29, 1935. While it relates stylistically to the next Grace Sparkes project, the Tuzigoot Museum, the Smoki exhibits differences in masonry construction. It has a large rectangular interior space with a different ceiling structure, fireplace details, interior décor designed by Kate Cory that set it apart as do the Spanish Colonial style display cabinets and other furnishings.

Grace Sparkes helped secure funds for excavations at Tuzigoot beginning in 1933-1934 on land owned by United Verde Copper Company in Clarkdale, Arizona. By June of 1934 the excavations were complete and the Tuzigoot ruin was stabilized and partially reconstructed under the direction of professional archeologists. Display cabinets for the excavated artifacts were constructed by manual arts classes at the Clarkdale High School and were later moved into the museum after its construction. In 1935 another CWA grant helped fund a project to reassemble pottery shards for display in the proposed new Tuzigoot Museum. This project took place in the vacant Wingfield Dry Goods Store in Clarkdale.

Working with the newly established WPA of July of 1935 after the demise of the CWA programs, which Grace Sparkes diligently worked to preserve by citing the good works in Yavapai County, she was able to demonstrate her successes with earlier projects. Thus, she secured funds for the construction of the Tuzigoot Museum on property, then owned by the Phelps Dodge Corporation. However, federal funds could not be used for construction on private property.

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# **National Register of Historic Places Continuation Sheet**

County and State	Yavapai, AZ

Phelps Dodge was persuaded to sell the Tuzigoot site to the 29<sup>th</sup> Arizona School District at Clarkdale on July 14, 1937.

Though the exact amount of funds expended for the museum are unknown or what the connection might have been with the National Park Service architects, the museum was completed in 1937. As a footnote to the Park Service involvement, in 1935, Frank Pinkley of the Southwestern National Monuments, asked that the Berkeley, California, Park Service office inspect the site and make suggestions. The inspection took place in December of 1935 and it was noted that the foundations were already laid. The inspector went on to assist with suggestions for structural changes and improvements in functionality.

Following the completion of the museum, Yavapai County began the process to secure federal protection for the Tuzigoot site as had been the case for other Arizona archeological sites. The cause for a Tuzigoot National Monument was undertaken by the Smoki organization and other local entities that used the press to publicize the site. In June of 1937 Frank Pinkley announced that the Secretary of the Interior had approved such an acquisition. In August of 1937 the school district transferred the property to the United States government, but it took until January of 1939 to resolve problems. Included was the transfer of school district lands to the federal government that was against Arizona state laws. Therefore, the State of Arizona acquired the land from the school district to facilitate the transfer. With the chain of title cleared, the President Franklin D. Roosevelt, through the Antiquities Act of 1906, was able to sign a proclamation on July 27, 1939, establishing Tuzigoot as a National Monument. This was the second National Park Service site in Yavapai County along with Montezuma Castle National Monument established in 1906.

Along with the new park, the National Park Service took control of the new Tuzigoot Museum and quickly set about staffing the site, primarily acting and permanent superintendents, who continued to reside in the custodial residence until the mid 1960s when the new Mission 66 housing was constructed within the park boundaries. The museum that was inherited by the National Park Service in 1939 was evaluated in the 1970s by the Western Regional Office as part of some of the earliest List of Classified Structures surveys. Regarding the architecture of the Tuzigoot Visitor Center in 1975, Architectural Historian Laura E. Soulliere wrote in a memo,

"The building does not purport to be an authentic reproduction of a pueblo, but uses specific elements of that building type. The Pueblo Style essentially began in California circa 1900 and later became popularized in New Mexico and Arizona. Nearly all Pueblo Style buildings were plastered, which makes this native stone Pueblo Style of Tuzigoot Visitor Center quite rare. The stone masonry reconstruction has the same adobe-colored mortar as the ruin reconstruction, and the true adobe mortar of the original pueblo was likely the same color. The interior ceiling structure provides a general idea of a pueblo ceiling system with post and lintel construction (the

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# National Register of Historic Places Continuation Sheet

Name of Property	Tuzigoot Museum
County and State	Yavapai, AZ

Name of Multiple Property Listing (If applicable)

notching is not authentic) and the proper hierarchy of vigas supporting smaller poles which are then topped with saplings. The irregular roofline and parapets are reminiscent of pueblo architecture, as are the stone canales which project out from the walls to carry rainwater from the roof. The peeled log lintels over the windows and doors come out of the Mexican tradition, but were often used in stone pueblo architecture. The native stone used in the building is the same sandstone and limestone of which the ruins are built, and this unity of the building material emphasizes the harmony of the structure with the pueblo ruins and the surrounding area of the Verde Valley. The building blends easily with the ruins because of the nearly identical stone and mortar. The visitor Center does not intrude on the archeological site – it fits."

Therefore, not only was the museum considered to be "rare" by an architectural historian, it was unique in that it was an inherited building funded by the WPA and acquired by the National Park Service two years after it was built. Because of this it has often been overlooked in Park Service publications contextual studies relating to Rustic style architecture despite probably having been designed by a Park Service architect. The focus on Park Service Rustic style has been on the Public Works Administration and the Civilian Conservation Corps. The Tuzigoot Museum was the product of the private sector utilizing parallel funding to achieve the same ends, construction employment and a new building to house artifacts that would attract visitors to Yavapai County.

The conversion of the Tuzigoot Museum into a visitor center was accomplished in 1968 with the construction of a new comfort station during the Parkscape Program of the National Park Service. This was the successor to the Mission 66 era that extended from 1956 to 1966. As a point of reference, the National Park Service has identified the entire period represented by the use of modernist architecture from 1945 through the end of the Parkscape Program in 1972 and generically "Mission 66." Thus, the Tuzigoot Visitor Center, with the addition of the comfort station and the conversion of the former custodial residence to office spaces, is an associated property type as documented by Sarah Allaback in Mission 66 Visitor Centers, the History of a Building Type and by Ethan Carr in Mission 66: Modernism and the National Park Dilemma. The largest multi-year construction program in NPS history, Mission 66 and its subsequent Parkscape Program were a major effort by the Park Service to upgrade the national park system to meet escalating visitor demands in the post World War II era. Conceived in 1935 by NPS Director Conrad L. Wirth and initiated in 1956 to substantially improve the facilities in the parks for the public and employees by 1966, the program was dubbed "Mission 66." It was continued after 1966 through 1972 for the 100<sup>th</sup> anniversary of Yellowstone National Park as the Parkscape Program under NPS Director George B. Hartzog, Jr. The Parkscape Program was conceived to continue projects not completed in 1966 and continue the rehabilitation of parks through new construction that was begun in 1956. While the programs resulted in the construction of employee housing, maintenance/utility areas, entrance stations, comfort stations, roads, parking lots, campgrounds, concession buildings, and, most importantly, the

(Expires 5/31/2012)

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newly conceived concept of the "visitor center." Architecturally, the visitor center most fully expressed the Mission 66 programs as a new property type that combined multiple functions. Typically, within one structure could be found administrative activities, museum space, public restrooms, and auditoriums. However at Tuzigoot due to limitations of the building, an auditorium was not included. In Mission 66 Visitor Centers, Sarah Allaback continued to state that the visitor center was "...the centerpiece of the new era in planning for visitor services in American national parks...," that could provide a "one-stop" service unity equipped with an information desk, uniformed staff, exhibits, and restrooms as well as administrative offices. All were accessible from a parking area where the visitor could get informed in the visitor center, and in the case of Tuzigoot, proceed directly to the trail to walk up to the archeological site at the apex of the mesa.

In addition to a new strategy for management, Mission 66 also resulted in a distinctive new type of NPS architecture that reflected new ideas. Sarah Allaback called it "Park Service Modern." Modern architecture was the prevalent architectural style in the postwar period and Mission 66 architects brought that design ethic to the national parks. Modernist architecture utilized new inexpensive materials and laborsaving techniques, many of which were developed by the military during the war. The assemblage of materials became the focus of the designs. By contrast, the Rustic style that the Park Service had earlier used required large labor forces for small buildings that blended with natural surroundings. Sarah Allaback noted that the new buildings "...reinterpreted the long-standing commitment to 'harmonize' architecture with park landscapes...," but accomplished in a different way.

In some instances visitor centers, like the Spanish Colonial inspired Coronado National Memorial Visitor Center in Arizona, the architecture of Mission 66 buildings was occasionally was inspired by local historical themes. During the Mission 66 era from 1956 to 1966, out of the over 100 visitor centers designed, constructed, or added onto, there were very few that were designed with attributes of historicism out of over a 100. At Sitka National Historical Park the visitor center, built 1963-1964, was designed to suggest a Tlinglit Long House. At the same time the circular Farview Visitor Center at Mesa Verde National Park was designed to suggest a kiva. The Big Hole National Battlefield Visitor Center was constructed as a tepee in 1964. The Puebloan style was the inspiration for the Chaco Culture National Historical Park Visitor center. 1957-1959, as well as the Tonto National Monument Visitor Center of 1962-1963. The open air visitor center of Pu'uhonua o Honaunau National Historical Park reflects Hawaiian traditional architecture as does the Hawaii Volcanoes National Park Visitor Center. Logan Pass Visitor Center at Glacier National Park, built 1963, was inspired by the park's predominant Swiss chalet style like the Lake McDonald Coffee Shop built in the park at the same time. The Trail Ridge Visitor Center of 1964-1965, Rocky Mountain National Park, displays some Alpine detailing commensurate with its mountain setting.

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With the transition into the Parkscape program, architects such a Milton Swatek, who had worked during the Mission 66 program for the San Francisco Western Office of Design and Construction and moved onto the newly established San Francisco Planning and Service Center, followed the same idea with the construction of the 1968 comfort station at Tuzigoot. Swatek designed the addition to reflect a southwestern style, but in modern materials and a modern design by addition a stone veneer dado around the building and battering the stucco walls. The roof structure has exposed beams and joists that contrast to the ceiling surface and within the open area are supported on log columns. Doors were designed to be a modern interpretation of vertical board doors.

## Photographs (continued)

1. West façade looking east and showing the west retaining wall and entrance steps to the west entrance porch. (August 2009)

2. Southeast view of the west wall and upper parking walkway. (August 2009)

3. West façade looking north and showing the west entrance porch, the museum block, the connecting office structure, and the residential wing. (August 2009)

4. North elevation of the west entrance porch looking south. (August 2009)

5. South elevation of the residential wing looking east and showing typical window units. (August 2009)

6. East porch of the residential wing looking southwest. (August 2009)

7. East elevation of the museum block looking northwest and showing the high window units and the chimney breast. (August 2009)

8. North elevation of the museum block and the 1968 comfort station addition looking south. (October 2009)

9. South elevation of the 1968 comfort station addition loggia area looking northeast and showing the northwest corner of the museum block. (October 2009)

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# National Register of Historic Places Continuation Sheet

Name of Property	Tuzigoot Museum
County and State	Yavapai, AZ

Name of Multiple Property Listing (If applicable)

10. Interior of the museum looking northeast and showing the log ceiling structure, log columns, and parallel rows of original museum display cabinets. At the rear is the exit doorway to the comfort station loggia area and the stone façade of the exhibit alcove room. (August 2009)

11. Detail of the original museum display cabinets showing the construction. (August 2009)

12. Interior of the museum showing the fireplace on the east wall. (August 2009)

13. Interior of the museum looking south towards the information desk and the office entrance into the connecting structure. Book sales are located on the left and the west entrance doorway is on the right. (August 2009)

#### Photographs (continued), page 2

14. North elevation of the Garage looking south and showing the double doors and the west areaway. (August 2009)

15. South elevation of the Garage looking northeast. (August 2009)

16. East Retaining Wall of the ridge escarpment near the Garage looking north and showing the east porch of the residential wing. (October 2009)

17. East Retaining Wall of the ridge escarpment along the museum block looking north and showing the battering of the wall. (October 2009)

18. East Retaining Wall of the ridge escarpment at the north end looking southeast and showing the north end of the wall and the steps down to the original water tank enclosure and the Pump House built into the base of the wall. (October 2009)

19. North elevation of the Pump House looking southwest and showing the entrance and the roof structure. (October 2009)

#### Tuzigoot Museum Name of Property

Yavapai, AZ County and State

#### 9. Major Bibliographical References

Bibliography (Cite the books, articles, and other sources used in preparing this form)

Allaback, Sarah. *Mission 66 Visitor Centers, The History of a Building Type*. Washington, DC: The Department of the Interior, National Park Service, 2000.

Carr, Ethan. Mission 66, Modernism and the National Park Dilemma. Amherst, MA: University of Massachusetts Press, 2007.

Dallett, Nancy. "Tuzigoot Administrative History," draft; July 10, 2009.

Mason, Aaron L. "The Administrative History of Tuzigoot National Monument;" Dec. 13, 1999.

National Park Service, Technical Information Center, Denver Service Center, Denver, CO; construction documents.

National Park Service, Tuzigoot National Monument, Tuzigoot NM, Clarkdale, AZ; history files, superintendents' annual reports, photographs, and List of Classified Structures forms.

National Park Service, Intermountain Region Conservation Center, Tucson, AZ; Superintendents' Annual Reports from 1943 and 1952.

Nickel, Edward A. "Report on the Building Program from Allotments of the Public Works Administration, 1933-1937," unpublished manuscript, Technical Information Center, Denver Service Center, Denver, CO; ca. 1937.

Peck, Fred R. "A History of Tuzigoot National Monument," draft. National Park Service, 1956. Copy on file at Tuzigoot National Monument, Clarkdale, AZ.

Sharlott Hall Museum, Prescott, AZ. "Outstanding Projects of Arizona CWA ERA," manuscript describing the Tuzigoot archeological excavations.

Tweed, William C. "Parkitecture: Rustic Architecture in the National Parks," draft located at the Technical Information Center, Denver Service Center, Denver, CO; 1981.

Tweed, William C., Laura E. Soulliere, Henry G. Law. "National Park Service, Rustic Architecture: 1916-1942." San Francisco: National Park Service, Western Regional Office; February 1977.

#### Previous documentation on file (NPS):

- preliminary determination of individual listing (36 CFR 67 has been Requested)
- previously listed in the National Register
- previously determined eligible by the National Register
- designated a National Historic Landmark
- recorded by Historic American Buildings Survey #
- recorded by Historic American Engineering Record #

Primary location of additional data:

- State Historic Preservation Office
- Other State agency
- X Federal agency -- National Park Service
- Local government
- University
- Other Name of repository:

Historic Resources Survey Number (if assigned):

6

# 10. Geographical Data

Acreage of Property Less than one acre (Do not include previously listed resource acreage)

#### **UTM References**

(Place additional UTM references on a continuation sheet)

1	12 Zone	006137 Easting	3847843 (NAD27) Northing	3	Zone	Easting	Northing	-
2	Zone	Easting	Northing	4	Zone	Easting	Northing	

Verbal Boundary Description (describe the boundaries of the property)

The boundary extends south from the north end of the west wall approximately 275 feet to a point south at the end of the retaining wall, then turns east extending 125 feet south behind the garage to the mesa escarpment. There it extends 250 feet north along the escarpment enclosing the east retaining wall, then turning west for approximately 125 feet to intersect with the north end of the west retaining wall.

Boundary Justification (explain why the boundaries were selected)

The boundary encloses the three principle buildings and the east retaining wall that are included in the Tuzigoot National Monument List of Classified Structures.

11. Form Prepared By	
name/title Rodd L. Wheaton, Architectural Historian	
organization	date February 2010
street & number 3021 S. Cornell Circle	telephone 303 789-9550
city or town Englewood	state CO zip code 80113-3012
e-mail TSARRODD@aol.com	

# **Additional Documentation**

Submit the following items with the completed form:

Maps: A USGS map (7.5 or 15 minute series) indicating the property's location.

Yavapai, AZ County and State

A **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.

- Continuation Sheets
- Additional items: (Check with the SHPO or FPO for any additional items)

## **Photographs:**

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map.

Name of Property: Tuzigoot Museum

**City or Vicinity: Clarkdale** 

County: Yavapai

State: Arizona

Photographer: Rodd L. Wheaton

Date Photographed: See individual listing on continuation sheets

Description of Photograph(s) and number: See Individual listing on continuation sheets

Photographs 1 through 19

(See Continuation sheets)

Property Owner		
(complete this item a	at the request of the SHPO or FPO)	
name Sup	erintendent, Montezuma Castle and Tuzig	goot National Monuments
street & number	527 Main Street	telephone 928 567-5276
city or town Can	np Verde	state AZ zip code 86332

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.). Estimated Burden Statement: Public reporting burden for this form is estimated to average 18 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management. U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.



## UNITED STATES DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES EVALUATION/RETURN SHEET

**REQUESTED ACTION:** NOMINATION

PROPERTY Tuzigoot Museum NAME :

MULTIPLE NAME :

STATE & COUNTY: ARIZONA, Yavapai

DATE RECEIVED: 6/18/10 DATE OF PENDING LIST: 7/30/10 DATE OF 45TH DAY: DATE OF 16TH DAY: DATE OF WEEKLY LIST:

REFERENCE NUMBER: 10000518

REASONS FOR REVIEW:

APPEAL:	Ν	DATA PROBLEM:	Ν	LANDSCAPE:	Ν	LESS THAN 50 YEARS:	N
OTHER:	Ν	PDIL:	Ν	PERIOD:	Ν	PROGRAM UNAPPROVED:	Ν
<b>REQUEST:</b>	Ν	SAMPLE:	Ν	SLR DRAFT:	Ν	NATIONAL:	N

COMMENT WAIVER:

7/15/10

8/02/10

ABSTRACT/SUMMARY COMMENTS:

\_ACCEPT \_\_RETURN \_\_REJECT \_\_7.15.10 DATE BSTRACT/SUMMARY COMMENTS: His nonneten bias lichecal return No FRO segnature

RECOM./CRITERIA		
REVIEWER	DISCIPLINE	
TELEPHONE	DATE	

DOCUMENTATION see attached comments Y/N see attached SLR Y/N

If a nomination is returned to the nominating authority, the nomination is no longer under consideration by the NPS.

(Rev. 01/2009)

# United States Department of the Interior National Park Service

# **National Register of Historic Places Continuation Sheet**

Section number \_\_\_\_ Page

Name of Property

County and State

Name of multiple property listing (if applicable)

## SUPPLEMENTARY LISTING RECORD

NRIS Reference Number: 10000518

Property Name: Tuzigoot Museum

County: Yavapaii State: AZ

This property is listed in the National Register of Historic Places in accordance with the attached nomination documentation subject to the following exceptions, exclusions, or amendments, notwithstanding the National Park Service certification included in the nomination documentation.

September 9, 2010 Date of Action ture of the k

Amended Items in Nomination:

Section 8: Statement of Significance

On page 5, it is clarified that the span of years, "1967 and 1972," refers to the Parkscape phase of Mission 66 era development. In the narrative of Section 8, the references to the CWA, WPA, and other federal relief programs, are, hereby, clarified and corrected as follows:

The CWA was a short-lived program which provided federal relief funds through state-directed grants for construction and other projects (1933-34); FERA funding, authorized by the Federal Emergency Relief Act, followed and was most likely responsible for the Smoki Museum completed in 1935. WPA funding became a major source of funding after July 1935 for non-federal public projects such as armories, town halls, local parks, swimming pools, public utilities, etc. The CCC-afilliated design staff of the NPS, which included in 1935 a regional office for state park CCC work at Oklahoma City, provided technical assistance and review of the plans for park-related WPA projects; in 1937 this function was absorbed into the newly realigned NPS organization of regional offices which combined the national and state park CCC programs. Shortly thereafter the Oklahoma City office was relocated at Santa Fe.

The Park History Division of the National Park Service was notified of this amendment.

DISTRIBUTION: National Register property file Nominating Authority (without nomination attachment)

## UNITED STATES DEPARTMENT OF THE INTERIOR NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES EVALUATION/RETURN SHEET

REQUESTED ACTION: RESUBMISSION

PROPERTY Tuzigoot Museum NAME :

MULTIPLE NAME :

STATE & COUNTY: ARIZONA, Yavapai

DATE RECEIVED: 7/29/10 DATE OF 16TH DAY: DATE OF WEEKLY LIST:

DATE OF PENDING LIST: DATE OF 45TH DAY: 9/12/10

REFERENCE NUMBER: 10000518

DETAILED EVALUATION:

DATE RETURN REJECT ACCEPT

ABSTRACT/SUMMARY COMMENTS:

Status of the Mission 666 contributing/noncontributing Status of the Mission 666 confirst station addotion. Despite to utilitarian form the addition displays a distinctine architectural character that echos the instorical style of the 1930s museum in modern the instorical style of the 1930s museum in modern the instorical style of the result is compatible construction materials the result is compatible design. Original building was a wpa project in 1935-32 bifore tack was made a aational monument bifore tack was made a aational monument distinct of Clarkdale. Nomination makes a Strong of of Clarkdale. Nomination makes a strong argument for the exceptional character of the addition. NR agnees up nPS populor on contributing Status ECOM. / CRITERIA ACOMP AND RECOM. / CRITERIA ACCORT A+C the lack of SH Clelland DISCIPLINE REVIEWER DATE 9-9-10 TELEPHONE DOCUMENTATION see attached comments Y/N see attached SLR Y/N



Photo 1 Tuzigoot Museum Claskdale, Yavapar Co, AZ R. Wheaton, 8/2009 West facade looking east 1/19



photo 2 Tuzigoot Museum Clarkdale, yavapai Co, AZ R Wheaton, 8/2009 SW view of the west wall 2/19



Photo 3 Tuzigoot Museum Clarkdale, Yavapai Co, AZ R. Wheaton, 8/2009 West facade looking North 3/19



Photo 4 Tuzigoot Museum Clarkdale, yavapai Co, AZ R. Wheaton; 8/2009 N. elevation & west Porch looking South. 4/19


Photo 5 Tuzigoot Museum Clarkdale, Gavapar Co, AZ R. Wheaton, 8/2009 S. elevation of the residential Wing looking E 5/19



Photo 6 Tuzigoot Museum Clarkdale, Yavapai Co, AZ R. Wheaton E porch of residential wing looking SW 6/19



Photo 7. Tuzigoot Museum Clarkdale, Yavapailo, AZ R Wheaton, 8/2009 E elevation of museum block looking NWD 7/19



Photo S. Tuzigoot Museum Clarkdale, Yavapai Co, AZ R. Wheaton, 10/2009 Nelevation of museum block and 1968 confort station looking S. 8/19



Photo 9. Tuzigoot Museum Clarkdale, yavapai Co, AZ R. Wheaton, 10/2009 S elevation of 1968 contort Station loggia looking NE 9/19



Photo 10. Tuzigoot Museum Clarkdale, Yavapai Co, AZ R. Wheaton, 8/2009 Interior of museum looking NE 10/19



Photo II. Tuzigoot Museum Clark dale, Yavapai Co, AZ R. Wheaton, 8/2009 Detail of original museum Cabinet 11/19



Photo 12. Tuzigoot Museum Clarkdale, Yavapai Co, AZ R. Wheaton, 8/2009 Interior of museum showing fireplace on E. Wall 12/19



Photo 13. Tuzigoot Museum Clarkdale, Yavapai Co, AZ R. Wheaton, 8/2009 Interior of museum looking south to information desk

13/19



Photo 14. Tuzigoot Museum, Garage Clarkdale, Yavapar Co., AZ R. Wheaton, 8/2009 N. elevation of garage looking S. 14/19



Photo 15. Tuzigoot Museum, Garage Clarkdale, Yavapai Co, AZ R. Wheaton, 8/2009 5. elevation of garage looking NE. 15/19



Photo 16. Tuzigoot Museum, E. Wall Clarkdale, Yavapai Co., AZ R. Wheaton, 10/2009 E. retaing wall near garage looking N. 16/19



Photo 17. Juzigoot Museum, E. Wall Clarkdale, Yavapar Co, AZ R. wheaton, 10/2009 E. retaining wall looking N 17/19



Photo 18, Tuzigoot Museum, E Wall and pump house Clarkdale, Gavapai Co, AL R. Wheaton, 10/2009 Evetaining wall, N. end looking SE and showing Pump House 18/19



Photo 19. Tuzigoot Museum, Pump House Clarkdale, Gavapai Co, AZ R. Wheaton, 10/2009 N. elevation of Pump House 160king SW showing entrance 19/19



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Director's Office Fax: 602.542.4188 May 21, 2010

Kathy M. Davis, Superintendent National Park Service Montezuma Castle & Tuzigoot National Monuments P.O Box 219 Camp Verde, AZ 86322

Dear Ms. Davis:

Thank you for providing a copy of the draft National Register of Historic Places registration form for the Tuzigoot Museum. Staff architect Robert Frankeberger and I have reviewed the draft pursuant to 36 CFR Part 60.9(c) and have the following comments and suggestions:

1. To begin with our most serious concern, we do not concur with the recommendation that the 1968 comfort station be included in the nomination as a contributing property. The nomination claims that the less than fifty-year-old comfort station meets the condition of exceptional significance under Criteria Consideration G for reason that it is a rare example of new construction from the Mission 66 era designed to be compatible with the existing park architecture. However, since a comparative sampling of that era's new construction is absent from the text, its "rarity" is difficult to verify. This document is not linked to a formal National Register Multiple Property Documentation Form that might provide appropriate criteria for evaluation.

The accompanying photographs of the comfort station, depicting it's introduction of an entirely different scale with it's cantilevered eaves as opposed to the parapets and considerable mass of the original building—belie the characterization of this addition as "designed in a compatible style"; which, apparently, is based solely on a low wainscot of veneered stone. With the exception of that cosmetic gesture and the battered wall, this addition could hardly have been conceived with more indifference to the existing architectural qualities of the museum building; moreover this new building has more in common with standard stand-alone comfort facilities throughout the park system.

The text of the draft registration form claims that this comfort station actually has *exceptional* architectural significance, as if it represented an important architectural accomplishment of the Mission 66 era. That era saw the construction of some outstanding examples of Modernist design, for example, the visitor center at Sunset Crater. To rank the provision of minor additions such as restrooms to existing NPS facilities such as the subject museum building with such works, and then to promote them as having such architectural merit as to meet the National

K. Davis 5/21/2010 p. 2

Register' criterion consideration for properties less than fifty years old is a debasement of the register's criteria with which we cannot agree.

Further, the draft nomination is inconsistent by excluding other properties falling within the same context. If the "period of significance" is extended to include the Mission 66 era, the other outbuildings, including the residences, should logically be determined as contributing properties as well. Beyond noting this inconsistency, we do not recommend such an extension of the period of significance. The comfort station should be considered as not contributing any characteristics that qualify the Museum Building for listing.

2. Under the section Category of Property, only a single 'X' should be marked, as specified in Bulletin 16A, p. 14. In this case, "Building" should be checked, but not "Structure."

3. The Comfort Station meets the definition of a 'building' in Bulleting 16A, p. 15, not a 'structure,' and should be included in the property count (as a noncontributor) and referred to in the text as such.

4. I recommend that the texts of Sections 7 and 8 be transferred off of continuation sheets and placed in the main body of the registration form, in the way it was intended. If you decide to retain continuation sheets then they should be properly numbered by section and page.

5. The Criterion Consideration section narrative does not explain how the property actually meets Criterion Consideration G. It merely repeats the definition of G as relating to a property less than 50 years old. While some parts of the text in Section 8 could have been used here, as stated above, we do not agree that any portion of this property meets this consideration.

6. The three paragraphs under Narrative Statement of Significance misreads the instructions. The form does not ask for a restatement of the Criteria A and C and Criterion Consideration G. Rather, it asks for at least one paragraph on each of the Areas of Significance, which were listed earlier as Entertainment/Recreation, Community Planning and Development, and Architecture. As it is, these areas are not addressed directly in the text.

7. I recommend omitting decimal points on UTM references, since the unit is meters and measurement to decimeters implies an unwarranted level of precision for the center point.

K. Davis 5/21/2010 p. 3

8. The Verbal Boundary Description can be improved by including measurements, as recommended in Bulletin 16A, p. 55. This should also be done on the supplementary sketch map.

9. On the unnumbered continuation sheet, Section 8, paragraph beginning "Grace Sparkes helped...", the reference to "another CWA grant" is inaccurate in that the CWA did not exist in 1935. The reference should be to the FERA (Federal Emergency Relief Administration). Likewise the following paragraph's statement about WPA "after the demise of the CWA" also should be corrected to refer to the FERA. The CWA provided funding for workers in the limited period of the winter of 1933-34, while FERA operated from 1933 through 1935.

If you have any questions or concerns you may contact me at wcollins@azstateparks.gov or Mr. Frankeberger at rfrankeberger@azstateparks.gov.

Sincerely,

William S. Collins

William S. Collins, Ph.D. Deputy State Historic Preservation Officer State Historic Preservation Office



## United States Department of the Interior

NATIONAL PARK SERVICE Montezuma Castle and Tuzigoot National Monuments 527 S. Main St. PO Box 219 Camp Verde, AZ 86322



IN REPLY REFER TO:

H30

June 3, 2010

Mr. Jim Garrison Arizona State Historic Preservation Officer 1300 W. Washington Phoenix, AZ 85007

Dear Mr. Garrison:

We are in receipt of your review comments regarding the National Register of Historic Places nomination for the Tuzigoot National Monument Museum and Visitor Center. The following comments are in response to the concerns listed in your May 21, 2010 letter.

1. The National Park Service believes that the comfort station addition is an integral part of the Tuzigoot Museum and Visitor Center. The comfort station is a representative example of an ethnically designed Mission 66-Parkscape addition, one of a few in the National Park Service still in existence from that era.

Please note that the Tuzigoot Museum is a "stand alone" nomination to include those properties determined eligible with your office in the past as part of the National Park Service's List of Classified Structures (LCS). We have on file a signed concurrence for the structures, hence the limited scope of this nomination.

As you are aware, the National Park Service does not currently have a multi-property nomination form for Mission 66 resources. The nomination of register eligible properties as listed on the LCS determined the extent of the Tuzigoot Museum nomination and was only expanded to include the historic west wall, originally omitted from the LCS. In the very near future we will be preparing a second nomination for the three Mission 66 residences in the park. We believe the residences meet National Register criteria on their own based on their unique design. That nomination will include all Mission 66 roadways and parking lots as non-contributing. Because of contractual considerations, these were not included in this nomination.

It is unfortunate that your office feels strongly regarding the significance of the comfort station considering your office's long standing interest in modernism in the Arizona National Parks including the preservation of the Mission 66 campground comfort stations at Grand Canyon National Park. We intend to forward the nomination on to the National Park Service's Federal Representative in Washington, D. C. with the comfort station included in the nomination.

2. Please note that the two "structures" marked under "Category of Property" refer to the east wall, listed in the LCS, and the west wall.

3. We believe the comfort station is an integral part of the Tuzigoot Museum, which is treated as one building in the National Register Nomination.

4. We have used the most current National Register of Historic Places form recommended by Linda McClelland of the National Register Office in Washington, D. C. We will not be merging the cover form with the continuation sheets.

5. We have added to the "Criterion Consideration" to further detail the two points in favor of the comfort station: it is a Mission 66 addition that updated the museum into a visitor center and it is ethnically designed.

6. We believe that the "Narrative Statement of Significance" meets the intent of the instructions. Each area is addressed adequately.

7. UTM coordinates were originally reported in the North American Datum of 1983 (NAD83) coordinate system. To conform with the USGS 7.5 minute series maps included in the nomination, coordinates were changed to the North American Datum of 1927 (NAD27) coordinate system. Coordinates were recorded to the nearest meter.

8. We have added dimensions to the boundary discussion.

9. The information in the "Significance" text is based on contemporary reports on file with the Smoki Museum, Tuzigoot Administrative history research, and several other sources. FERA was not mentioned as a participating agency. Please note that the CWA existed during the first half of 1935, until it was subsumed by the WPA in July of that year. Because the important aspect of the construction of the Tuzigoot Museum is its status as a WPA project that predated the National Park Service acquisition, we will not make any additional changes to the National Register nomination.

Thank you for your diligence in reviewing the Tuzigoot Visitor Center National Register Nomination. Despite our differences in opinion, it is clear that we both agree the Visitor Center is an important part of Arizona and National Park Service history. We look forward to working with your office on future National Register nominations.

Sincerely,

Kathy Davis

Superintendent



United States Department of the Interior

NATIONAL PARK SERVICE Montezuma Castle and Tuzigoot National Monuments 527 S. Main St. PO Box 219 Camp Verde, AZ 86322



IN REPLY REFER TO:

H30

June 14, 2010

Robert K. Sutton, Ph.D. Chief Historian, National Park Service 1201 Eye Street, NW Washington, DC 20005



Dear Dr. Sutton:

Enclosed you will find a copy of a National Register of Historic Places Registration Form for the Tuzigoot National Monument Museum and Visitor Center located in Clarkdale, Arizona. As you will read, the Tuzigoot Museum is an exceptional example of a Pueblo Revival structure built in 1935 with funding from the Works Progress Administration. The nomination also includes an associated garage, pump house, retaining wall and comfort station. We feel that the comfort station, although less than 50 years old, is also eligible for the National Register as an exceptional example of Mission 66 architecture.

In addition to the National Register forms, photographs and maps; a copy of correspondence from the Arizona State Historic Preservation Office is also enclosed. The correspondence documents the Arizona State Historic Preservation Office's review of the enclosed material as well as their concerns with our classification of the comfort station as a significant and contributing element of the Museum complex. Although we have corrected many of the technical errors outlined in their May 21, 2010 letter, we do not feel the Mission 66 structure should be reclassified as a "noncontributing element." We have outlined our corrections and intention to move forward with the nomination in the enclosed response letter dated June 3, 2010.

We look forward to your review and comment of the enclosed documents. If you have any questions or concerns, please feel free to contact Park Archeologist Matthew Guebard at (928)649-6195x225 or matt\_guebard@nps.gov.

Sincerely,

Kathy Davis

Superintendent

Enclosures (6) cc: Sande McDermott, Deputy Regional Director Cultural
Linda	McClelland/WASO/NPS
-------	---------------------

To Alexis Abernathy/Contractor/NPS@NPS

06/22/2010 10:11 AM

Subject Fw: Tuzigoot Museum nomination

cc

bcc

This message has been replied to and forwarded.

Alexis--Will you let me know when the NPS Tuzigoot Museum nomination comes in. Thanks. Linda

----- Forwarded by Linda McClelland/WASO/NPS on 06/22/2010 10:11 AM -----



History:

06/18/2010 12:55 PM

tsarrodd@aol.com

To Linda\_McClelland@nps.gov cc Subject Tuzigoot Museum nomination

#### Linda:

I am writing to appeal to you to carefully review the nomination I recently wrote for the Tuzigoot Museum and Visitor Center in Arizona. I included the 1968 Comfort Station which is attached to the 1935-36 museum and is part of the facade. I made a case for the generally compatible design of the comfort station and established that it is one of a few structures from that era that actually attempted to have some historical design connections. The significance spells out the WPA connections of the original building and the Mission 66/Parkscape history of the comfort station that converted the earlier building to a visitor Center.

The Arizona SHPO office hates the comfort station and believe that it is non contributing!!! This is coming from the same office that did not like the fact that I had earlier written that interiors of the Coronado Visitor center and the Saguaro Visitor Center were non contributing. (The AZ SHPO office has a long history of trying to meddle in rehabilitations of the museum interiors.) I was told that if the interiors were non contributing, so were the exteriors. I believe that there could be a similar analogy with the comfort station being non contributing, since it is such an integral part of the whole. The AZ SHPO also tried to make a great case for the comfort stations at Grand Canyon when they were remodeled, but those were "standard" designs with little significance unlike the thoughtful design of the Tuzigoot comfort station. I am totally shocked at the reversal of opinion from that office.

In the correspondence you will probably see Bill Collins of the AZ SHPO office reviews of the document and the park's comments twice. Mr. Collins is also splitting hairs with regard to CWA-FERA-WPA connections. I used contemporary sources to write the statement of significance and never ran across a reference to FERA. As you and I have discussed earlier, the drawings are marked as being for the WPA and dated December 1935 following the shift in management organizations in July of 1935 to WPA.

Working with the AZ SHPO office in a cooperative way has become very difficult and I fear for the upcoming Albright Training Center nomination at Grand Canyon. That nomination will be progressing through state review in the near future and on to WASO. When I asked Bob Frankeberger about his opinion on the addition to that building, I was told that it met the Secretary Standards for Rehabilitation and was therefore satisfactory. He went on to state that the addition to the Tuzigoot Museum should have followed similar guidelines!!! I had to remind him that they did not exist in 1968. It has all become tedious and tiresome to be berated at every step with no regard for the park's commitment to nominate and the work that went into preparing the nomination.

does not have to be so. It is really a rather simple process, and if incorporated into the early planning stages of all undertakings, it can be relatively painless and efficient. The keys are early planning, knowing the law and its regulations, early and frequent communication, especially with the SHPO, and attention to each step in the process. There are eight basic steps (see also ACHP 1989):

Step 1: Determine if your proposed action is an undertaking. That is, does it have the potential to effect historic properties? If you do not know, assume it does. It is best to initiate Consultation with the SHPO at this stage to facilitate a smooth process.

**Step 2:** Assess your information needs. Have historic properties been identified and evaluated in the area of the potential effects (APE)? Completion of a basewide survey to inventory and evaluate your cultural resources is the best way to accomplish this. If inventories have not been done, then you need to complete intensive surveys in the APE for this specific undertaking. Notify SHPO of your results, and your Determinations of Eligibility within the APE. SHPO has 30 days to agree, not agree, or not respond. If they do not respond, assume they agree. If they do not agree with your evaluations, try to resolve the issue through discussions with them. If this does not work, then send documentation to the National Park Service and requests a formal Review of Eligibility by the Keeper of the National Register. The Keeper's decision on eligibility of a resource is final.

Step 3: If historic properties are not present, then notify SHPO that you have made a Determination of No Effect. In this case, SHPO has 15 days to comment on your determination. If SHPO agrees, proceed with your undertaking. The Section 106 process is complete.

Step 4: If historic properties are present, then you must Determine Effect(s) of the undertaking on historic properties: Will there be an Adverse Effect? Consult with SHPO in applying Criteria of Effect to help you decide the actual effects.

Step 5: If you determine there is No Adverse Effect: Notify ACHP of your decision. The Council usually agrees with the agency if SHPO concurs in the decision.

**Step 6:** If you determine there is an Adverse Effect, which means that the undertaking will cause some or many changes to historic property(s), then you must resolve this Adverse Effect through Consultation between your Agency, the SHPO, the ACHP, and any interested parties. Consultation is discussion, a give and take process with one goal: to reach agreement on a course of action.

**Step 7:** Consultation results in a Memorandum of Agreement (MOA) or a Programmatic Agreement (PA) that mitigate the Adverse Effects to historic properties. The MOA specifies the mitigation plans or alternatives agreed to by the consulting parties. Mitigations can range from avoiding part of an area, to detailed photographic recording and historic documentation, to full scale data recovery at archaeological sites. The MOA is where creativity and common sense play major roles. A PA specifies the long-term Program of historic preservation, maintenance, management, or research agreed to by the consulting parties. Whichever you use, the MOA or PA must specify who is responsible for carrying out the agreed-upon measures. Either of these agreement documents gives the ACHP the opportunity to Comment (i.e. to review the project, the process, the agreement, and the means to alleviate the Adverse Effect). The signed MOA or PA acknowledge that the agency has "Taken Into Account" the effects of the undertaking on historic properties.

Step 8: End of the Section 106 Process: Proceed with the Undertaking.

Now that I will be editing the multiple resource nomination for Mission 66 buildings for the Intermountain and Pacific West Regions, I can assure you that there will be no Arizona nominations in it that would open the door for the AZ SHPO to condemn that effort before it is instituted to your office's liking. I have your comments and would welcome your additional thoughts on the multiple resource nomination.

I hope you are doing well and that things will taking a turn for the better in your offices now that Stephanie is your fearless leader.

With regard, Rodd.

Rodd L. Wheaton Architectural Historian 3021 S. Cornell Circle Englewood, CO 80113-3012 Phone: 303 789-9550 This is similar to an action under the National Environmental Policy Act (NEPA). It is any activity that has the potential to disturb or change the character of a historic property. All ground disturbing activities are undertakings, unless they have already been subjected to the 106 process.

#### Players

With these three definitions in mind, we also need to be familiar with the players involved. There are five different entities who need to consult:

#### Advisory Council on Historic Preservation (ACHP):

This is a Federal agency set up by the NHPA that advises all other Federal agencies in ways to effectively carry out the provisions of the NHPA. Section 106 requires that all Federal agencies afford the ACHP the opportunity to comment on their undertakings.

#### State Historic Preservation Offices (SHPOs):

State agencies established by the NHPA that consult with Federal agencies on issues of historic preservation. They also maintain statewide inventories of historic properties and undertakings. The regulations to the NHPA in 36 CFR 800 require that Federal agencies consult with SHPOs in regard to identifying historic properties, determining the effect an undertaking may have on those properties, and on coming up with ways to mitigate any adverse impacts the proposed undertakings may have on historic properties on lands within the state boundaries.

#### Native American and Native Hawaiian Organizations:

The NHPA requires Federal agencies to consult with Native groups that might attach religious or cultural significance to properties potentially affected by a Federal undertaking. These groups sometimes make themselves known, but most of the time you will have to track them down. The SHPO, National Park Service, and we at AFCEE can assist you in identifying who to consult.

#### Interested Persons and Members of the Public:

36 CFR 800 requires that Federal agencies provide opportunities for members of the public to comment on preservation issues related to the proposed undertaking. Local historical and avocational archaeological groups comprise a large number of these interested parties. They and the SHPO can help you identity who to consult.

#### Federal Agencies:

All agencies within the Federal government are responsible for complying with the NHPA and its regulations. The Federal agency should take the lead with historic preservation issues on the lands that it manages. For us in the DOD, this means that historic preservation officers and cultural resource specialists at installations, major commands, and headquarters levels need to grasp and execute our responsibilities under the NHPA, and not to rely on SHPOs or the ACHP to make or direct decisions regarding historic preservation. In fact, the main cause of problems with historic preservation issues on military installations is related to misunderstanding the primary roles that DOD agents are supposed to play in relation to the other players in the Section 106 process. The DOD is mandated by the NHPA to make decisions regarding specific aspects of historic preservation. In many cases, problems can be traced to one of two extreme courses of action: (A) The DOD entity ignored its responsibility in the process, or (B) the DOD entity mistakenly transferred most of its authority to one or more of the other players.

#### The Section 106 Process

Section 106 of the NHPA requires that Federal agencies consider the effects on Historic Properties of undertakings that they finance, permit, or license. It also requires that Federal agencies allow the ACHP the opportunity to comment on the proposed undertaking. Compliance with these requirements is reached through a series of steps called the 106 process. Many commanders and managers believe the process is odious and awesome, because its seems to be a quagmire of paperwork and outside influence on their operations. It



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General Fax: 602.542.4180

Director's Office Fax: 602.542.4188 "Managing and conserving natural, cultural, and recreational resources"

June 30, 2010

Carol Shull Keeper of the National Register National Park Service 1201 Eye Street, NW 8<sup>th</sup> Floor (MS 2280) Washington, D.C. 20005-5905

Dear Ms. Shull.

This letter and attached memo are a departure from our normal practice in regard to federal nominations of properties to the National Register of Historic Places. For the first time in my eighteen years as State Historic Preservation Officer for Arizona, we are in a disagreement with an agency, here a unit of the National Park Service, over a property that they are submitting under the criterion consideration for properties less than 50 years old, but that we believe does not meet that consideration. Let me state right away that we fully support the nomination of the primary museum building, a notable public building from the 1930s. Our disagreement is in regard, primarily, with the inclusion of a 1968 restroom addition as meeting Criterion Consideration G, and, secondarily, with other technical concerns in the nomination document itself.

Throughout my tenure, the Arizona SHPO has tried to respect the intent of Criterion Consideration G, which acknowledges that while some properties may have gained significance within the last 50 years, most properties require the test of time in order to fully evaluate whether they are truly representative of significant historical or architectural contexts. To that end, all nominations through this office for properties less than 50 years old have had to follow the 1994 special guidelines reviewed by your office and approved by our Historic Sites Review Committee (see Attachment #2). While federal agencies are not held formally to this procedure, I believe it lays out a standard for consideration whose strength is the multiple authoritative perspectives it recommends and which it would have been possible for the agency to imitate in a reasonable measure. We are especially concerned about the inconsistency between NPS units, such as Grand Canyon National Park, which in the past have argued against the eligibility of similar utility buildings during Section 106 consultation.

Our recommendation is that the nomination should proceed for the 1930s era museum, with the 1968 addition classified as a noncontributor. This does not preclude the possibility of reevaluating the addition in 2018 when the issue of Criterion Consideration G would no longer be a factor. However you choose to act on this nomination, I would appreciate if I can be copied on thoughts you may write on the issues we have raised. If you have any questions or concerns you may contact me at (602) 542-4009 or at jgarrison@azstateparks.gov.

Sincerely,

James W. Garrison State Historic Preservation Officer Arizona State Parks

Attachment: 1. Memo of concern 2. Arizona SHPO Policy for Properties Less than 50 Years Old



# Memorandum

Partnerships Division • Grants • SHPO • • Planning and Recreational Trails •

To: Carol Shull, Keeper of the National Register of Historic Places

From: James Garrison, Arizona State Historic Preservation Officer

1300 W. Washington Phoenix, AZ 85007 Fax: 602-542-4180

Date: July 2, 2010

RE: Tuzigoot Museum National Register nomination

The following notes specify the opinion of the Arizona State Historic Preservation Officer and his staff regarding the draft nomination of the Tuzigoot Museum. Our primary concern is detailed in Point #1 and is in regard to the nomination's statement that it meets National Register Criterion Consideration G as a property less than 50 years old that has achieved significance within the past 50 years. This Criterion Consideration is applied to the museum because of the inclusion of the 1968 comfort station addition as a contributing element of the property. It is the opinion of the Arizona SHPO that the text of the nomination does not support the claim that this addition meets the standard of exceptional architectural significance intended by Criterion Consideration G.

1. The nomination is accurate in characterizing the Museum Building as an example of the expressive architecture, within the park system, meant as an interpretation of place, and intended to enrich the visitor's experience, with it's affected "Puebloan Style".

The nomination states that the less than fifty-year-old comfort station meets the condition of exceptional significance under Criterion G for reason that it is a rare example of new construction from the Mission '66 era designed to be compatible with the existing park architecture. Absent a comparative sampling of that era's new construction, it's "rarity" cannot be verified.

However the accompanying photographs of the comfort station, depicting it's introduction of an entirely different scale with it's cantilevered eaves as opposed to the parapets and considerable mass of the original building - belie the characterization of this addition as "designed in a compatible style"; which, apparently, is based solely on a low wainscot of veneered stone.

With the exception of that cosmetic gesture and the battered wall, this addition could hardly have been conceived with more indifference to the existing architectural qualities of the museum building; moreover this new building has more in common with standard stand-alone comfort facilities throughout the park system.



IMG 2248, 2453 accompanying the draft nomination

If the "period of significance" is extended to include the Mission '66 era, the other outbuildings, including the residences, should logically be determined as contributing properties as well. Nevertheless, the comfort station should be considered as not contributing any characteristics that qualify the Museum Building for listing.

2. The text of section 8 (page numbers are lacking) cites two studies of Mission 66 architecture within the National Park Service. However, at this time there has not been approved a National Register of Historic Places Multiple Property Documentation Form (MPDF) specifying property types associated with that context or criteria for evaluating eligibility. In particular, there are no criteria to distinguish distinctive works of architecture meeting Criterion C or Criterion Consideration G. Arizona contains, in our opinion, modernist works of great merit associated with Route 66, such as the Sunset Crater National Monument Visitors Center. But without the guidance of an MPDF, we have no means of coming to an agreement when (to the AZ SHPO) obviously minor works, such as the facilities added to the 1930s Tuzigoot Museum building are treated as equivalent works of architectural design. To claim that the addition of this restroom effectively changed this museum into a 'visitors center' that we should respect as we would a work of an architect, cheapens, in our view the recognition that is implied by National Register listing.

3. The lack of an accepted MPDF has now led to the absurd contradiction that similar utilitarian facilities to the Tuzigoot restroom building at Grand Canyon National Park, were considered by that NPS unit as having no architectural merit and thus not eligible for the National Register. This evaluation came about as a result of Section 106 consultation related to modification to comfort stations at Grand Canyon.

The text of Section 8 cites a number of landmark works of architecture constructed during the Mission 66 program at such NPS park units as Coronado National Memorial, Sitka National Historical Park, Farview Visitor Center at Mesa Verde, and others. To compare these acknowledged master works with a restroom addition at Tuzigoot rises, in our opinion, to the level of absurdity.

4. The Arizona SHPO has a procedure (see attachment #2) approved by the Keeper of the National Register for the of evaluation properties nominated under Criterion Consideration G. This document details the careful consideration that nominations

submitted through this office undergo and includes the requirement that a nomination must include letters of concurrence from acknowledged experts in the appropriate field (history, architectural history, architecture, etc.) demonstrating that the property has been considered from multiple perspectives and that the nomination does not simply reflect the opinion of the preparer.

While federal agencies need not follow this procedure, given that there is no MPDF to provide guidance for evaluating this property types, we recommend that the preparer provide independent expert evaluation on the architectural merit of the comfort station so as to resolve this conflict.

Alternatively, or preferably from our perspective, we recommend that this nomination go forward for the historic museum with the comfort station classified as noncontributing. This does not preclude the possibility of reevaluating this outbuilding in 2018 when the question of Criterion Consideration G and exceptional significance is no longer a concern.

#### The following are technical comments regarding other aspects of the nomination.

5. Under the section Category of Property, only a single 'X' should be marked, as specified on the form and in Bulleting 16A, p. 14. In this case, 'Buiding(s)' should be checked, but not 'structure."

6. Our understanding of the new NRHP form is that one intention is to place the primary text of Sections 7 and 8 in the actual form rather than on continuation sheets. While continuation sheets are still acceptable, for consistency with other nominations coming from Arizona, we encourage preparers not to use continuation sheets for this text. If you chose to keep the continuation sheets please make sure they are properly page numbered.

7. Under the 'Criteria Consideration' section, the explanation includes the statement that the comfort station "is also significant for its use of ethnic design," a phrase and concept that is not explained in the text of either Section 7 or 8. Perhaps this is being used synonymously with Pueblo Revival, which would be inappropriate, there being nothing ethnic about a style invented by Anglo-Americans to romantically, and vaguely imitate the style of another time and culture.

8. When the issue of exceptional significance is raised, it is imperative that a greater effort be made to compare buildings with others that share a similar context. This is complicated by the exceptional significance being raised in regards to the restroom, but not to the museum building itself. As to the museum, we feel that the discussion of the Smoki museum in Prescott is too cursory to be of value and we disagree with the way in which it dismisses the comparison. The Smoki Pueblo (1931) and the Smoki Museum (1935) in Prescott (NRHP listed, 1994), as is stated in the narrative of Section 8, were the result of local community businessmen, led by Chamber of Commerce secretary Grace Sparkes, seeking means to promote tourism in Yavapai County. Architecturally, these buildings and the museum at Tuzigoot share the same stylistic affectations of an unsheathed stone exterior and a style imitative of a prehistoric pueblo. What is more, the Smoki Pueblo is clearly the superior work of architecture, with the Smoki Museum not much less distinguished. Architecturally, the museum at Tuzigoot is the lesser of the three buildings. This is not surprising as the promoters had fewer resources to work with as these buildings were constructed in turn. With this nomination placing

such a strong emphasis on the exceptional architectural merit of the restroom, it should be acknowledged that the Tuzigoot Museum is not itself an exceptionally significant building, architecturally speaking, within its defined context. The only difference is that National Park Service eventually acquired the lesser of the three buildings when it decided to make the Tuzigoot ruin a national monument.

9. In Section 8 are references to continuing work at Tuzigoot funded by the CWA in 1935. Please be aware that the CWA ceased to exist on March 31, 1934, with many of its outstanding projects continued by the Federal Emergency Relief Administration (FERA). Both agencies were administered by Harry Hopkins and historical records sometimes confused the distinction, as sometimes the PWA and WPA are confused. The references to 1935 work should be changed from CWA to FERA if they predate the WPA project.

10. Under UTM Reference, the Easting appears incorrect and both numbers are completely different from what was in the earlier draft. Perhaps these can be checked again.



## United States Department of the Interior

NATIONAL PARK SERVICE 1849 C Street, N.W. Washington, D.C. 20240

Memorandum

To: Chief, National Register of Historic Places and National Historic Landmarks

From: Chief Historian, National Park Service Kuluf & With

Re: Tonto Visitor Center and Tuzigoot Visitor Center

Enclosed please find the National Register of Historic Places (National Register) nominations for two National Park Service visitor centers in Arizona. I have signed both nominations as eligible for the National Register. Both nominations are being nominated under Applicable Criterion C and with architecture as the area of significance.

9/15/10

The Tonto Visitor Center documentation has been recreated because of the loss of the original. The Arizona State Historic Preservation Office (AZSHPO) has confirmed by email and with a pdf of the signature page the concurrence on the eligibility of the visitor center.

The AZSHPO disagrees with me concerning the eligibility of the Tuzigoot Visitor Center. I believe the restroom addition during the Mission 66 period of National Park Service construction does not detract enough from original architecture to render the building ineligible for loss of integrity.

## FACSIMILE TRANSMISSION ARIZONA STATE PARKS

PARTNERSHIPS DIVISION SHPO • Planning • Grants

To: Linda McClelland

Fax #: (202) 371-6447

From: William Collins, AZ SHPO

Fax #: 602-542-4180 Phone #: 602-542-7159

Date:	Sept. 28, 2010	Number of pages (including cover	) 11
RE:	Tuzigoot Museum.		

Attached is the correspondence which was intended to accompany the submission of the Tuzigoot Museum nomination. While I understand that the property is now listed, we would appreciate your comments on the points that we raised. This way our thinking can be kept in line with the policy of your office.

"Managing and conserving natural solutional and recreational resources"



June 30, 2010

Carol Shull Keeper of the National Register National Park Service 1201 Eye Street, NW 8<sup>th</sup> Floor (MS 2280) Washington, D.C. 20005-5905

Dear Ms. Shull.

This letter and attached memo are a departure from our normal practice in regard to federal nominations of properties to the National Register of Historic Places. For the first time in my eighteen years as State Historic Preservation Officer for Arizona, we are in a disagreement with an agency, here a unit of the National Park Service, over a property that they are submitting under the criterion consideration for properties less than 50 years old, but that we believe does not meet that consideration. Let me state right away that we fully support the nomination of the primary museum building, a notable public building from the 1930s. Our disagreement is in regard, primarily, with the inclusion of a 1968 restroom addition as meeting Criterion Consideration G, and, secondarily, with other technical concerns in the nomination document itself.

Throughout my tenure, the Arizona SHPO has tried to respect the intent of Criterion Consideration G, which acknowledges that while some properties may have gained significance within the last 50 years, most properties require the test of time in order to fully evaluate whether they are truly representative of significant historical or architectural contexts. To that end, all non-nations through this office for properties less than 50 years old have had to follow the 1994 special guidelines reviewed by your office and approved by our Historic Sites Review Committee (see Attachment #2). While federal agencies are not held formally to this procedure, I believe it lays out a standard for consideration whose strength is the multiple authoritative perspectives it recommends and which it would have been possible for the agency to imitate in a reasonable measure. We are especially conferned about the inconsistency between NPS units, such as Grand Canyon National Park, which in the past have argued against the eligibility of similar utility buildings during Section 106 consultation.

Our recommendation is that the nomination should proceed for the 1930s era museum, with the 1968 addition classified as a noncontributor. This does not preclude the possibility of reevaluating the addition in 2018 when the issue of Criterion Consideration G would no longer be a factor. However you choose to act on this nomination, I would appreciate if I can be copied on thoughts you may write on the issues we have raised. If you have any questions or concerns you may contact me at (602) 542-4009 or at jgarrison@azstateparks.gov.

Sincerely,

James W. Garrison State Historic Preservation Officer Arizona State Parks

Attachment: 1. Memo of concern 2. Arizona SHPO Policy for Properties Less than 50 Years Old

Tucson

Governor State Parks Board Members

Chair

fracey Westerhausen Phoenix

Janice K. Brewer

**Reese Woodling** 

Larry Landry Phoenix

Walter D. Armer, Jr. Vail

> Alan Everett Sedona

William C. Scalzo Phoenix

> Maria Baler State Land Commissioner

Renée E. Bahl Executive Director

Arizona State Parks 1300 W. Washington Phoenix, AZ 85007

Tel & TTY: 602.542.4174 AZStateParks.com

800.285.3703 from (520 & 928) area codes

General Fax: 602.542.4180

Director's Office Fax: 602.542.4188

WSC

1300 W. Washington		Memorandum Partnerships Division
		• Grants • SHPO •
Ē		Planning and Recreational Trails
<b>The second seco</b>	To:	Carol Shull, Keeper of the National Register of Historic Places
Arizona ® State Parks	From:	James Garrison, Arizona State Historic Preservation Officer
Phoenix, AZ 85007	Date:	July 2, 2010
Fax: 602-542-4180	RE:	Tuzigoot Museum National Register nomination

The following notes specify the opinion of the Arizona State Historic Preservation Officer and his staff regarding the draft nomination of the Tuzigoot Museum. Our primary concern is detailed in Point #1 and is in regard to the nomination's statement that it meets National Register Criterion Consideration G as a property less than 50 years old that has achieved significance within the past 50 years. This Criterion Consideration is applied to the museum because of the inclusion of the 1968 comfort station addition as a contributing element of the property. It is the opinion of the Arizona SHPO that the text of the nomination does not support the claim that this addition meets the standard of exceptional architectural significance intended by Criterion Consideration G.

1. The nomination is accurate in characterizing the Museum Building as an example of the expressive architecture, within the park system, meant as an interpretation of place, and intended to enrich the visitor's experience, with it's affected "Puebloan Style".

The nomination states that the less than fifty-year-old comfort station meets the condition of exceptional significance under Criterion G for reason that it is a rare example of new construction from the Mission '66 era designed to be compatible with the existing park architecture. Absent a comparative sampling of that era's new construction, it's "rarity" cannot be verified.

However the accompanying photographs of the comfort station, depicting it's introduction of an entirely different scale with it's cantilevered eaves as opposed to the parapets and considerable mass of the original building - belie the characterization of this addition as "designed in a compatible style"; which, apparently, is based solely on a low wainscot of veneered stone.

With the exception of that cosmetic gesture and the battered wall, this addition could hardly have been conceived with more indifference to the existing architectural qualities of the museum building; moreover this new building has more in common with standard stand-alone comfort facilities throughout the park system.



IMG 2248, 2453 accompanying the draft nomination

If the "period of significance" is extended to include the Mission '66 era, the other outbuildings, including the residences, should logically be determined as contributing properties as well. Nevertheless, the comfort station should be considered as not contributing any characteristics that qualify the Museum Building for listing.

2. The text of section 8 (page numbers are lacking) cites two studies of Mission 66 architecture within the National Park Service. However, at this time there has not been approved a National Register of Historic Places Multiple Property Documentation Form (MPDF) specifying property types associated with that context or criteria for evaluating eligibility. In particular, there are no criteria to distinguish distinctive works of architecture meeting Criterion C or Criterion Consideration G. Arizona contains, in our opinion, modernist works of great merit associated with Route 66, such as the Sunset Crater National Monument Visitors Center. But without the guidance of an MPDF, we have no means of coming to an agreement when (to the AZ SHPO) obviously minor works, such as the facilities added to the 1930s Tuzigoot Museum building are treated as equivalent works of architectural design. To claim that the addition of this restroom effectively changed this museum into a 'visitors center' that we should respect as we would a work of an architect, cheapens, in our view the recognition that is implied by National Register listing.

3. The lack of an accepted MPDF has now led to the absurd contradiction that similar utilitarian facilities to the Tuzigoot restroom building at Grand Canyon National Park, were considered by that NPS unit as having no architectural merit and thus not eligible for the National Register. This evaluation came about as a result of Section 106 consultation related to modification to comfort stations at Grand Canyon.

The text of Section 8 cites a number of landmark works of architecture constructed during the Mission 66 program at such NPS park units as Coronado National Memorial, Sitka National Historical Park, Farview Visitor Center at Mesa Verde, and others. To compare these acknowledged master works with a restroom addition at Tuzigoot rises, in our opinion, to the level of absurdity.

4. The Arizona SHPO has a procedure (see attachment #2) approved by the Keeper of the National Register for the of evaluation properties nominated under Criterion Consideration G. This document details the careful consideration that nominations submitted through this office undergo and includes the requirement that a nomination must include letters of concurrence from acknowledged experts in the appropriate field (history, architectural history, architecture, etc.) demonstrating that the property has been considered from multiple perspectives and that the nomination does not simply reflect the opinion of the preparer.

While federal agencies need not follow this procedure, given that there is no MPDF to provide guidance for evaluating this property types, we recommend that the preparer provide independent expert evaluation on the architectural merit of the comfort station so as to resolve this conflict.

Alternatively, or preferably from our perspective, we recommend that this nomination go forward for the historic museum with the comfort station classified as noncontributing. This does not preclude the possibility of reevaluating this outbuilding in 2018 when the question of Criterion Consideration G and exceptional significance is no longer a concern.

## The following are technical comments regarding other aspects of the nomination.

5. Under the section Category of Property, only a single 'X' should be marked, as specified on the form and in Bulleting 16A, p. 14. In this case, 'Buiding(s)' should be checked, but not 'structure."

6. Our understanding of the new NRHP form is that one intention is to place the primary text of Sections 7 and 8 in the actual form rather than on continuation sheets. While continuation sheets are still acceptable, for consistency with other nominations coming from Arizona, we encourage preparers not to use continuation sheets for this text. If you chose to keep the continuation sheets please make sure they are properly page numbered.

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9. In Section 8 are references to continuing work at Tuzigoot funded by the CWA in 1935. Please be aware that the CWA ceased to exist on March 31, 1934, with many of its outstanding projects continued by the Federal Emergency Relief Administration (FERA). Both agencies were administered by Harry Hopkins and historical records sometimes confused the distinction, as sometimes the PWA and WPA are confused. The references to 1935 work should be changed from CWA to FERA if they predate the WPA project.

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Linda McClelland/WASO/NPS 11/23/2010 04:06 PM To Alexis Abernathy/Contractor/NPS,

C	C	
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Subject Fw: Tuzigoot Museum

#### Alexis--

Here's an SLR for Tuzigoot done *vis a vis* comments sent by Bill Collins. Attached to my memo to Bill Collins (below) is also a copy of comments I wrote up at Bill's request. He called after the listing and wanted to know for future review purposes what our position on this matter was. It seems that the State office is confusing the need for individual resources to be of exceptional importance with the evaluation of additions that are less than 50 years of age. I sent him a copy of our draft white paper on additions. A copy of these comments along with the slr clarifying some information in the nomination has been added to the nomination file. A copy of the SLR is in your mailbox.

Linda SLR master on continuation sheet-AZ.doc

----- Forwarded by Linda McClelland/WASO/NPS on 11/23/2010 04:06 PM -----

Linda McClelland/WASO/NPS 11/19/2010 03:39 PM

To wcollins@azstateparks.gov

CC

Subject Tuzigoot Museum

Bill--

Here are the comments I promised explaining our decision to accept the NPS FPO's nomination with the rest room recognized as "contributing."

While I appreciate your concerns, we find that the determination of "contributing" is justified within the nomination and supported by existing knowledge, historic context, and comparative information concerning the visitor center property type. This property type was introduced and perfected during the NPS's historically significant program of development, Mission 66/Parkscape, which extended from 1955 to 1972. The context for Mission 66 visitor centers and the larger Mission 66/Parkscape program of design of construction has been developed, and was used in the preparation of the nomination to evaluate the significance of the addition as an integral part of the museum's history and physical evolution.

I have also attached a copy of the draft white paper on modern additions that was prepared by this office in 2008, has been the subject of several workshops, and is available on the NR/NPS website. You will note that this paper makes a clear distinction between the approach for evaluating the exceptional importance of an individual resource and that for determining whether or not an addition contributes to a historic property. The paper also discusses the differences that may be encountered in making evaluations under Criterion A *versus* Criterion C. For these reasons, we find that defining a period of significance extending to the 1967/68 renovation is appropriate given the history and evolution of the Tuzigoot Museum and the importance attached to the visitor center concept.

I welcome the opportunity to discuss these issues further with you, and please let me know if you have any further comments about the listing or the draft white paper.



Tuzigoot Museum.docx White\_paper\_on\_additions\_4-09.doc

Linda McClelland Historian National Register of Historic Places 202-354-2258 202-37-6447 (FAX) linda\_mcclelland@nps.gov

#### **Tuzigoot Museum**

Clarkdale, Yavapaii County, Arizona

#### Comments

The SHPO and FPO are in disagreement about the contributing status of the 1960s rest room addition to the 1930s WPA-funded museum. The nomination as submitted by the FPO links the 1967 construction of the rest room addition and remodeling of the museum building to the NPS design concept of the visitor center, which was a product of the NPS policies for facility development and interpretation associated with the massive Mission 66 program. This justifies the extension of the period of significance to include the 1967/8 alterations that equipped the older museum to function as a modern visitor center. The construction of the rest rooms was just one aspect of the redevelopment of the building during the Mission 66/Parkscape Era, which also included the conversion of the former custodian's quarters to office space and made improvements to the adjoining road, parking area, and landscape. The National Register has accepted the FPO's finding of "contributing" for the reason outlined below.

While the proposed Mission 66 MPS remains in an uncompleted, draft form, several other sources provide contextual background supporting the significance of the visitor center form and provides a basis for determining the contribution of these changes to the historic evolution of the Tuzigoot museum. These include the NHL theme study, *Mission 66 Visitor Centers* (2000), by Sarah Allabach, which includes registration requirements for NPS visitor centers; *Museum Curatorship in the National Park Service, 1904-1982* (1993) by Ralph H. Lewis; the epilogue, "NPS Design since 1940," in *Building the National Parks* (1998) by Linda McClelland; and the comprehensive study entitled *Mission 66, Modernism and the National Park Dilemma* (2007) by Ethan Carr. These sources have been in use for several years and the NPS has considerable experience in applying the National Register of Historic Places Criteria to the evaluation of visitor centers of the Mission 66/Parkscape era which dates from 1956 to 1972.

The nomination claims that the comfort station is one of the rare examples from the Mission 66/Parkscape era designed to be compatible with existing park architecture. The addition is not documented as contributing on the basis of outstanding artistic quality, but rather on its representation of NPS design policy during what has been documented as a historically significant era of park development and modernization. The addition stands in stark contrast to the ubiquitous, utilitarian and unadorned comfort stations constructed of concrete blocks which were installed in most national parks during the Mission 66 era. The description and photographs both indicate that considerable attention went into designing an addition that reflected a modern equivalent to the 1930s revival style which drew from the indigenous architecture of the Southwest. Despite its utilitarian form and lack of sophistication, the addition displays a distinctive architectural character that echoes the 1930s Pueblo Revival style in modern construction materials. Regardless of how an architectural critic might judge the artistic quality of the addition, it remains a distinctive example of the continuing efforts of NPS designers to harmonize park architecture with the natural setting of a park and incorporate historical, indigenous, and regional references into building forms and details. The underlying intention appears to have been the adaptation of design principles and practices for which the NPS became known in the 1930s--such as battered stone walls, overhanging eaves, and exposed wooden vigas and rafters—to an economical and visually compatible modern form using modern building methods and materials.

Experimentation here led to an unusual synthesis of historicized features and machine-cut materials. Furthermore, the addition reflects the shift toward a more environmentally compatible style of architecture which marked the NPS design policy during the Parkscape era, 1967 to 1972.

The task of the nomination preparer was to determine whether the rest room addition contributes to the larger building and site of which it is a part, which also includes road and landscape improvements from the early 1960s. The addition was not evaluated as an individually eligible resource, but rather as an integral part of the historic evolution of the museum/visitor center. The finding of "contributing" within the context of the NPS's post-war efforts to adapt the former museum to the modern needs and an increasing volume of park visitation is, furthermore, consistent with the draft white paper on modern additions which can be found on the NPS/NR website (copy attached). Since the primary resource under evaluation is the museum building, which is clearly individually eligible, it is unnecessary to extend the boundaries to include nearby resources dating to the Mission 66-era. The recognition of a larger district at a future date might result from the completion of the Mission 66 Multiple Property Submission (currently in draft form) and the development of registration requirements for additional resource types, including park villages.

prepared by Linda McClelland, Historian

**Recommended SLR items:** 

On page 5, it is, hereby, clarified that the span of years, "1967 and 1972," refers to the Parkscape phase of Mission 66 era development.

In the narrative of Section 8, the references to the CWA, WPA, and other federal relief programs, are, hereby, clarified and corrected as follows:

The CWA was a short-lived program which provided federal relief funds through statedirected grants for construction and other projects (1933-34); FERA funding, authorized by the Federal Emergency Relief Act, followed and was most likely responsible for the Smoki Museum completed in 1935. WPA funding became a major source of funding after July 1935 for non-federal public projects; like the CWA program, WPA funding channeled federal relief monies through state agencies that selected and directed the projects.

#### Evaluating the Significance of Additions and Accretions A National Register White Paper Linda McClelland (linda mcclelland@nps.gov), 4-20-08

This paper is intended to supplement not replace information in the National Register Bulletins and other NPS publications. If discrepancies are found between this paper and other NPS publications, the guidance in existing publications should be considered correct. Comments are welcome and should be directed to the author. After review and discussion, the substance of this paper may be incorporated into future publications.

#### Introduction

The National Register program is receiving an increasing number of requests (additional documentation, tax act projects, and new nominations) requiring that the contributing status be determined for additions to historic properties. The issue of how to treat later additions to historically or architecturally significant properties is not addressed in *How to Apply the National Register Criteria* or any other NR guidance. A clearly articulated policy and guidelines for the evaluation of additions to historic properties, particularly those built less-than-50 years ago, are needed. The following paper examines the issues related to this topic and makes recommendations for a statement of policy and guidelines.

#### **General Approach for Evaluating Integrity**

While many of the tax-act related cases are commercial buildings in an urban setting (including corporate complexes), similar issues arise in the National Register evaluation of churches (with education wings or new sanctuaries), schools (with less-than-50 gymnasiums or auditoriums), museums and libraries, industrial complexes, and college campuses. Buildings with later additions may also have undergone other alterations that may or may not be considered historically significant.

The date and physical character of the addition and the reasons the property meets the National Register Criteria are important factors in evaluating whether or not an addition contributes to a property's significance. An assessment of the effect of the addition on the property's historic integrity is an important step in evaluation and may also become a deciding factor in eligibility, especially in cases where a question of incompatibility arises between the old and the new.

--For already-listed properties, the additions may have been built outside the previously recognized period of significance and require the evaluation of a longer or additional period of significance. This sometimes means extending the period of significance into the less-than-fifty-year period through a nomination amendment.

--For new nominations, the evaluation of later additions will directly relate to 1) the approval of a period of significance for the property, and 2) the contribution the addition makes to the significance of the property. In some cases--when a later addition is out of scale with the historic property, is incompatible in design and materials, or has damaged, obscured, or obliterated significant character-defining features--the effect of an addition on the property's historic integrity may become a determining factor of eligibility.

#### Relationship to Qualifying National Register Criteria and Criteria Consideration G

The National Register Criteria for which the property is eligible or listed will affect the determination of whether or not an addition is considered historically significant or contributing. Period of Significance is a primary factor in evaluating the significance of an addition, and the approach taken to define a property's period of significance will vary from criteria to criteria. Criteria A and B most often call for a continuing period of significance relates to one or more singular events or activities or a brief period of historic activity or association (e.g. a Civil War battlefield). Criterion C, on the other hand, most often calls for a brief period of significance usually based on the date of construction. Less-than-fifty-year-old additions that have dramatically transformed a property's appearance should be considered new construction and be evaluated in its entirety under Criterion Consideration G.

Properties listed under Criteria A and B most often have a lengthy period of significance. Here the evaluation of whether an addition contributes or not is generally based on whether or not it was constructed within the period of significance. The problem with less-than-fifty-year resources becomes one of deciding an appropriate "historic" period for the property and linking the more recent additions to the continuing significance of the property. National Register guidance encourages the selection of a closing date based on historical events or the duration of significant activities or historical associations, provided a reasonable explanation is given to justify a particular closing date. Past practice, however, indicates most periods of significance are "cut-off" at the fifty-year mark, whether or not a reasonable argument could be made to extend the period to a more rational and historically relevant point in the history of the property. While this practice avoids the less-than-fifty-year issue altogether for some areas of significance, it results in the recognition of an arbitrary and meaningless closing date (that almost immediately is out of date).

A short period of significance (usually limited to the date of construction) is often identified for properties listed only for significance in design (landscape architecture, architecture, engineering, and community planning) under Criterion C. Significant additions and alterations are recognized by additional periods of significance (based on their respective construction dates). This means that in order to be contributing a later addition must not only be compatible but also have design significance (either by contributing to the significance of the earlier design or in its own right). Less-than-fifty year old additions will need to demonstrate strong architectural character that ties it to the historic building and, in many cases, qualifies as exceptionally important under Criterion Consideration G. Because integrity requirements for materials, design, and workmanship may be higher for properties having design significance, the evaluation of additions are more often likely to require a critical examination of historic integrity; this will likely mean assessing the effect of the addition on the property's overall design.

While Criteria Consideration G calls for properties less-than-fifty-years of age to have "exceptional importance," it does not address when later additions should be considered a significant and contributing aspect of a historic property's evolution. The wording of Criteria Consideration G allows the extension of the period of significance for historic districts several years beyond the fifty-year mark so that resources that are "integral" parts of a historic district may be recognized as contributing (this issue is treated in *How to Apply, Guidelines on Evaluating Properties that Have Achieved Significance within the Past 50 Years; and Guidelines for Evaluating and Documenting Historic Residential Suburbs*). Because this concept does not apply to individually nominated properties, the contribution of less-than-fifty additions must be based on a justification that the property possesses exceptional importance or that the significance of the property continued into the less-than-fifty period. In most cases, evaluations of less-than-fifty-year additions require strong significance either under A and B or C (approaching if not actually possessing exceptional significance).

There are several key issues here that can be examined by asking a set of questions:

#### Continuing significance

--In the case of properties significant for their association with events or important persons (Under A & B), how does the addition reflect the continuing significance of the property? Has a reasonable argument been made for the closing date of the period of significance? Can the addition be considered part of the historic evolution/development of the property? Is it compatible in size, scale or character to the original building and earlier additions (already recognized as significant)?

#### Significance for Design

--In the case of architecturally significant resources (Criterion C only), does the addition possess architectural importance in its own right? Is it consistent with the design of future additions as specified in the original historic plans (e.g. Dulles Airport)? If less-than-fifty years of age, does the addition possess exceptional importance? Is it an outstanding example of its period and/or type, the work of a master, or "architecturally compatible" design of the late 20<sup>th</sup> century? Have later additions damaged historically significant or character-defining features?

#### Impact of Additions and Accretions on Historic Integrity

The NR Bulletin, *How to Apply the Criteria* (pp. 44-7), states that "Integrity is the ability of a property to convey its significance," and "Ultimately the question of integrity is answered by whether or not the property retains the identity for which it is significant." These guidelines set forth a process of evaluating integrity whereby the presence of each of the seven attributes (location, design, setting, materials, workmanship, feeling and association) is considered in relationship to the property's significance. While this process is useful when focused upon the primary resource, it does not provide much direction in dealing with additions.

Although the Secretary of the Interior's Standards for Rehabilitation (see Appendix) are not intended for evaluation purposes, they provide terminology and a set of values for "good practice" that can be useful for evaluating additions. Whereas National Register guidance is concerned with the impact of alterations on significant features, the Secretary's standards focus on "character-defining" features. Derived from the standards, the following sets of questions can help evaluate the impact of an addition and other changes on a historic property.

#### Compatibility

-- Is the addition sympathetic to or compatible with the historic property? How does it compare in size, scale, materials, design, and workmanship? What other alterations occurred at the time the addition was construction? Do these cumulatively affect the property's historic integrity?

#### Accurate Representation

-- How do the addition and any related alterations affect the property's ability to accurately portray its history and physical evolution? Does the addition read as an addition to an earlier building? Does the addition accurately represent the property's history and physical evolution? Does it evoke a false sense of history or mask the property's significant historic character?

#### Protection of Significant Features and Reversability

-- What is the nature of the connection joining the historic building and addition (exterior and interior)? What alterations and changes occurred to the design, materials, and workmanship of the original building when the addition was constructed (including any changes to the exterior walls or internal corridors to accommodate the addition)? Are changes reversible? Were any significant landscape elements (courtyards, gardens, vistas, etc.) altered or lost when the addition was built?

#### Visibility

-- Has the addition obscured, covered, or altered the principal facades, historic entrances, or character-defining (significant) features of the property? How conspicuous is the addition in views of the principal elevations? How conspicuous is it in views of (secondary) minor elevations? How does the addition interrupt, interfere with, or dominate any historically significant views of the building or important views seen from the building (including the orientation of the building to the street, scenic vistas, views of an inner courtyard or surrounding campus, or the principal facades as viewed from various approaches)?

#### **Some General Principles to Follow**

The following principles should be considered when evaluating the impact of an addition on a historic building and determining the significance of the addition.

o An addition should fall within the period of significance, and, in some cases, its date of construction may be used as the closing date of an extended period of significance.

o An addition should be sympathetic to the original design (i.e. stylistically appropriate, sensitively rendered, compatible in size and scale, similar or compatible materials). Both the impact of an addition on the original design and historical fabric and the cumulative effect of the addition along with other changes and alterations to the building (window replacements, siding, etc.) should be considered. To be considered contributing an addition that is not sympathetic in design must not substantially damage the historic property and must have historical importance in its own right (and, if necessary, exceptional importance).

o An addition should not mimic the historic design to the extent that it becomes indistinguishable from the original building and thereby conveys a false sense of history (matter of veracity and accuracy). The exceptions, here, are the many additions of the 1920s to 1940s which represent recognized patterns of period design which called for replication of the historic design characteristics.

o An addition should not overwhelm or dominate the historic character of the property as a whole or alter the property's character-defining features (including significant open space). Out-of-scale additions, rooftop additions, and additions that obscure principal elevations are particularly problematic (unless they are stepped back and appear small in scale) and may be difficult to justify as contributing.

o An addition should not hide a building's principal façade from the public right of way and other significant viewpoints, or change the perceived orientation of entrances.

o An addition should not impair significant or character-defining features of the historic resource.

#### Appendix: Secretary of the Interior's Standards for Rehabilitation

The wording of the following Standards relate to evaluations of historic integrity and are relevant to the evaluations of whether or not an addition contributes to a property's historic significance.

"The historic character of a property shall be retained and preserved." (Standard 2)

"Each property shall be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development...shall not be undertaken." (Standard 3)

"Most properties change over time; those changes that have acquired historic significance in their own right shall be retained. (Standard 4)

"New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." (Standard 9)

"New additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." (Standard 10)