United States Department of the Interior National Park Service

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National Register of Historic Places Multiple Property Documentation Form

This form is used for documenting multiple property groups relating to one or several historic contexts. See instructions in How to Complete the Multiple Property Documentation Form (National Register Bulletin 16B). Complete each item by entering the requested information. For additional space, use continuation sheets (Form 10-900-a). Use a typewriter, word processor, or computer to complete all items.

X New Submission Amended Submission
A. Name of Multiple Property Listing
Devils Tower National Monument Multiple Property Submission
B. Associated Historic Contexts
1) Recreation and Tourism at Devils Tower National Monument, 1880s-1950;
2) Administration and Development of Devils Tower National Monument, 1906-1950;
3) National Park Service Rustic Architecture and Public Works Construction in Devilor Tower National Monument, 1933-1940;
4) The Historic Landscape Design of the National Park Service, 1916 to 1942 (see Linda McClelland's accompanying multiple property nomination, Historic Park Landscapes in National and State Parks)
C. Form Prepared by
name/title Kathy McKoy, Historian, NPS, Intermountain Region, Denver Support Office street & number 12795 W. Alameda Parkway telephone (303) 969-2878 city or town Lakewood state CO zip code 80228
D. Certification
As the designated authority under the National Historic Preservation Act of 1966, as amended, I hereby certify that this documentation form meets the National Register documentation standards and sets forth requirements for the listing of related properties consistent with the National Register criteria. This submission meets the procedural and professional requirements set forth in 36 CFR Part 60 and the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation. See continuation sheet for additional comments.) Signature and title of certifying official Date
(Federal Historic Preservation Officer)
National Park Service Federal agency
I hereby certify that this multiple property documentation form has been approved by the National Register as a basis for evaluating related properties for listing in the National Register. Main

(See continuation page for certification by commenting official.)

June 12, 2000

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D. Certification (commenting official)

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this documentation form meets the National Register documentation standards and sets forth requirements consistent with the National Register criteria. This submission meets the procedural and professional requirements set forth in 36 CFR Part 60 and the Secretary of the Interior's Standards and Guidelines for Archeology and Historic Preservation.

Commenting official

(State Historic Preservation Officer)

Wyoming State Historic Preservation Office Commenting Agency

(Note: Additional comments may be expressed in a letter which will be submitted along with this form to the Federal Historic Preservation Officer and the Keeper of the National Register of Historic Places.)

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Item E

Four historic contexts are associated with the extant historic resources at Devils Tower National Monument: 1) Recreation and Tourism at Devils Tower National Monument, 1880s-1950, 2) Administration and Development of Devils Tower National Monument, 1906-1950, and 3) National Park Service Rustic Architecture and Public Works Construction in Devils Tower National Monument, 1933-1940. In addition, certain historic resources were evaluated under a fourth historic context, The Historic Landscape Design of the National Park Service, 1916-1942, found in Linda McClelland's multiple property nomination, Historic Park Landscapes in the National and State Parks. The first three historic contexts included in this multiple property submission are preceded below by background information on the geology of a distinctive natural feature and the early history of the monument.

Location and Geology

Devils Tower National Monument is located in the Belle Fourche River Valley of the Black Hills in northeastern Wyoming. Devils Tower is a unique and dramatic monolith that dominates the surrounding countryside. Called *Mato Tipila* (Bear Lodge) by the Lakota, Devils Tower began as a mass of molten magma that forced its way upward though layers of Jurassic era sedimentary rocks about 60 million years ago. Through time, the surrounding sedimentary layers eroded away to expose the hard igneous rock called phonolite porphyry. The tower rises 875 feet from its base; its diameter is 1,000 feet across the base and 275 feet across the top.

The Tower as a Traditional Cultural Property

Native Americans revered this prominent butte during the historic period and many continue to value it as an important sacred place. In addition, evidence exists that during both the historic and contemporary periods successive generations of Native American groups have returned to the tower and its surrounding landscape to carry out traditional rituals and ceremonies.

As a Traditional Cultural Property (TCP), the tower is significant under criterion A for its association with the ideology, encoded beliefs, rituals, and/or sacred narratives of several Native American tribes, including the Lakota, Crow, Cheyenne, Arapaho, Kiowa, and Eastern Shoshone.¹ Ethnohistorical data and ethnographic research have directly linked the site with the traditional beliefs of several Northern Plains tribes.² Several versions of creation stories exist explaining the origins of the natural tower and making it central to the beliefs and rituals of the Northern Cheyenne, Kiowa, and Arapaho. To the Lakota, the tower is a sacred place of renewal and continues to be the subject of the Sun Dance, which is performed during the summer solstice. Individuals and groups of several tribes have conducted traditional ritual activities at the tower which include vision quests, sweat lodge rites, fasting, and praying by the Crow and Lakota; possible burials by the Arapaho and Cheyenne; and group rituals such as the Sun Dance of the Lakota.

The tower is also significant under Criterion B for its association with gods and demigods who figure importantly in tribal traditions and are central to tribal creation narratives. These gods and demigods include Mato, the Great Bear, the Lakota god symbolizing wisdom, who imparted the sacred language and ceremonies of healing to Lakota shamans at Devils Tower thus making it the birthplace of wisdom and an important connection between the tribe and the cosmos. To the Kiowa, Crow and Arapaho, the tower is similarly associated with legends involving the Great Spirit, the transformation of a human to a bear, and the creation of the tower itself or of constellations.

National Register of Historic Places Devils Tower Determination of Eligibility, February 3, 1997.

² Jeffery R. Hanson and Sally Chirinos. Ethnographic Overview and Assessment of Devils Tower National Monument. USDI, NPS, Cultural Resource Selections No. 9, 1997.

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Although the tower trail, which encircles the base of the tower, marks the extent of the current TCP determination of eligibility, additional sites related to the traditional cultural use of the tower likely exist outside this boundary and will be the subject of further ethnographic study and evaluation.

Acknowledging the Native American cultural values attached to Devils Tower, the Park Service implemented a Climbing Management Plan in 1995 that called for climbers to voluntarily refrain from climbing each year during the month of June out of respect for Indian traditional activities and beliefs. The month of June was determined to be the most sensitive month for Native American traditional religious activities at the tower. The plan also called for an expanded interpretive program at the monument to explain to the general public the cultural significance of the monument to numerous American Indian tribes.

Individuals and groups who felt that the plan violated the establishment clause of the 1st Amendment to the Constitution legally challenged the Climbing Management Plan in 1996. The 10th Circuit Court resolved the case in 1999 in favor of the National Park Service. Consequently, the voluntary request for climbers to refrain from climbing during the month of June (and the expanded interpretative activities) remains in place. The monument superintendent has established an on-going consultation process to work with the culturally affiliated tribes to help provide information on the Tower's cultural significance and to gain insight on culturally appropriate methods for its protection and preservation.

Early History of Devils Tower

In addition to its significance to Native Americans, Devils Tower has also long been a landmark for Euro-Americans who lived in or traveled through the region. The first known Euro-American to see the tower was J. T. Hutton, a topographer with Captain W. F. Raynolds' Yellowstone Expedition. Hutton visited the tower with a Sioux guide on July 20, 1859, but left no physical description of it. In 1875, a U.S. Geological Survey expedition visited and recorded information about the formation. Its commander of the military escort, Colonel Richard I. Dodge, was the first to refer to it as "Devils Tower" in his book, The Black Hills, saying that the "The Indians call this shaft The Bad God's Tower, a name adopted with proper modifications, by our surveyors."

While the Treaty of 1868 guaranteed the Black Hills region to the Sioux, the 1874 reports of gold from General George A. Custer's expedition into the South Dakota portion of the Black Hills resulted in an immediate invasion by miners, leading to war with and finally removal of the Sioux from the region in 1876. In the early 1880s the first permanent Euro-American settlers arrived in the Belle Fourche Valley in the vicinity of Hulett. Most were small-scale farmers and ranchers from the Midwest. The only person to file a homestead claim within the current monument's boundaries was Charles Graham, a cowboy who worked for a large ranch near the tower, who filed a preemption notice for 160 acres on February 1, 1890. Recognizing that Devils Tower was a "great national wonder" and anticipating speculators, the General Land Office instructed its agents on August 11 of that year to reject all applications for lands "embracing any portion of Sec. 7 and 18, T.53 N., R. 65 W., Sec. 12 and 13, T. 53 N., R. 66W." Graham's application was thus denied.

³ Contemporary Native people feel "Devils Tower" is a pejorative misnomer and would like to see the name changed to Bear Lodge or another that is more culturally appropriate.

⁴ Edmund B. Rogers. "History of Legislation Relating to The National Park System Through the 92nd Congress," Appendix C, copy of Department Order from the General Land Office.

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Recreation and Tourism at Devils Tower National Monument, 1880s-1950; Administration

and Development of Devils Tower National Monument, 1906-1950
Two historic contexts for the monument, Recreation and Tourism and Administration and Development, overlap considerably in time period and thus are described together in the following narrative.

From the time of early Euro-American settlement in the Belle Fourche Valley, the tower was a favorite camping and picnicking spot. Residents in Hulett, located ten miles away, recalled having to ford the Belle Fourche River as many as seven times and walk two miles on foot to reach the monolith. Before the era of the automobile, visitors reached the site by horseback, wagon or buckboard over primitive dirt roads. The trip was usually made once or twice a year with a stayover of one or two nights. Fourth of July observances were sometimes held at the tower, with participants coming from considerable distance.

The most well known Fourth of July event occurred in 1893, when widely distributed handbills advertised speakers, food and drink, hay and grain for horses, dancing, and -- the featured attraction -- the first climbing of the tower by a local rancher named William Rogers. Rogers and another rancher, Willard Ripley, prepared a 350-foot ladder to the summit of the tower. Pegs of native oak, ash, and willow, 24 to 30 inches in length and sharpened on one end, were driven into a continuous vertical crack found between the two columns of the southeast side of the formation. The pegs were then braced and secured to each other by a continuous wooden strip to which the outer end of each peg was fastened. Before the exhibition ascent, the men planted a 12-foot flagpole on the summit. The construction of the ladder was quite possibly a more hazardous undertaking than the subsequent climbing of the tower.

Conservative estimates say that about 1,000 people came from up to 125 miles away to witness the first formal ascent of the tower. After the proper ceremonies, Rogers climbed the tower in about an hour and, amid cheering from the throngs below, unfurled the American flag from the flagpole. Later in the day, wind tore the flag loose, which fell to the base of the tower. Roger and Ripley's enterprising wives, who were running a refreshment stand below, tore it into pieces and sold them as souvenirs. Rogers' wife Linnie ascended the ladder two years later, becoming the first known woman to reach the summit of the tower. An estimated 25 people later ascended the tower using Rogers' ladder, the last being "Babe" White ("the Human Fly") in 1927. A portion of the ladder remains on the southwest side of the tower.5

The increasing influence of preservationists such as Gifford Pinchot, America's first professional forester, and John Muir, founder of the Sierra Club, led to the creation of Yellowstone National Park in 1872 and Yosemite National Park in 1890. In 1892 the tower and nearby Little Missouri Buttes were designated a National Forest Reserve. That same year, Wyoming Senator Francis E. Warren introduced a bill (S3364) urging Congress to create a "Devils Tower National Park." The bill died quietly in committee, leaving the newly created forest reserve to languish for 14 years without funds for its protection and management.

Under the newly created Antiquities Act of 1906 and with the urging of Representative Frank W. Mondell of Wyoming, President Theodore Roosevelt designated Devils Tower the first national monument on September 24, 1906. The proclamation set aside 1,152.91 acres, which excluded the Little Missouri Buttes. The remainder of the forest reserve was opened for settlement in 1908. After the establishment of the monument in 1906, the General Land Office appointed E. O. Fuller to look after the tower, along with his other duties as special investigator with the Sundance GLO office, which he did from 1908 to 1919. During this period souvenir hunters were reported to be chipping away portions of the formation, fueling fears that the landmark was threatened.

 $^{^{5}}$ Description of the event is taken from Mattison, "Devils Tower National Monument, A History," pp. 10-

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Consequently, Fuller posted warning signs on the monument in hopes of discouraging vandalism.

The increasing popularity of the automobile created a demand for visitor facilities in the area. The National Park Service (NPS; Park Service) was organized in 1916, and the monument placed under its jurisdiction. After a July 4, 1916, picnic at the tower in which some 500 participants had to walk a mile and a half over a trail that was "washed out and filled with logs" in order to reach the tower, a petition was drafted by 153 persons and sent to Congressman Mondell. It requested Congress appropriate funds to build a bridge across the Belle Fourche and to convert the giant formation into a public resort. In response, in 1917 the NPS and Crook County built a 12 to 16-foot wide road three miles long leading into the tower. A bridge was not completed until 1928.

The Park Service provided only minimal accommodations for visitors during the 1920s. County Commissioner John M. Thorn of Hulett was appointed custodian in 1921 and paid an annual salary of \$12. A log shelter was built in 1922 to protect visitors from inclement weather. Without a resident custodian, trespassing stock grazed the area, sometimes occupying the log shelter erected for visitors. In 1929, the secretary of Custer Battlefield Highway Association complained to the director of the National Park Service that the road to the tower "was a disgrace," also pointing out that the monument needed a full-time custodian. In spite of the hardships, visitation rose from 7,000 to 14,720 between 1921 and 1930. Numerous applications to operate concessions at the monument were denied during this period, with the Park Service insisting such development take place outside the monument's boundaries.

During the late 1920s, federal and state highways in the area were either constructed or improved, making the tower more accessible from the south by paved roads. Increased publicity of Devils Tower as one of the natural "wonders of the world," promoted by local and state Chambers of Commerce, travel associations, newspapers and magazines, also elevated the area as a national tourist attraction by 1930. Although pressure from local people and travel organizations was strong throughout the early 1920s, the bridge was not constructed until 1927-1928. The steel truss bridge had only been in place a year when a flood washed out the east approach. In an attempt to prevent future flood erosion, a canal was cut to divert the Belle Fourche River, and 39 massive concrete tetrahedrons linked by cables were installed along the east bank by the Bureau of Public Roads in 1930. In 1933, 32 additional tetrahedrons were placed downstream from the existing ones by Emergency Conservation Work laborers.

The first full-time custodian was appointed to the monument in the early 1930s. George C. Crowe served 1931-1932, when Newell F. Joyner succeeded him. The 1930s witnessed extensive development for the monument, particularly after the creation of public relief agencies in 1933. Working under the supervision of the Park Service, the Civilian Conservation Corps inaugurated construction projects that included the building of roads and footpaths, installation of modern water and electrical systems, and establishment of picnic and camping areas. Employee residences were improved or constructed, along with a museum (now the visitor center) and numerous maintenance buildings. The improved roads and visitor facilities were much in demand, as visitation to the monument almost tripled from 11,000 in 1931 to 32,951 in 1941. Many visitors stopped while en route to Yellowstone National Park.

⁶ Ibid., p. 14.

⁷ Ibid., p. 16.

The bridge has since been replaced.

John Daugherty. "Devils Tower National Monument: A History of National Park Service Developments Through 1966," pp. 10-11.

Mattison, "Devils Tower National Monument, A History," p.17.

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While local people had frequently held social events at the tower since the late 19th century, it was not until 1932 that they formally organized as the Northern Black Hills Pioneer Association. Membership was limited to those who had lived in the area for at least 35 years, presumably non-Native. One day a year, usually in June, they sponsor the Pioneers Picnic at Devils Tower, which featured speakers, music and sometimes contests. The Devils Tower Natural History Association has begun to record the oral histories of older folk in the vicinity who can recall these events and how the resources appeared at an earlier time.

Professional mountain-climbers began climbing the tower (without the aid of Rogers' ladder) in the late 1930s. The first ascent, with Park Service consent, was made in 1937 by three mountain-climbers, members of the American Alpine Club. The climb took four hours and forty-six minutes. Eleven years later, 16 members of the Iowa Mountain Climbers Club reached the summit and spent the night there. By 1955, there had been 173 recorded individual ascents of the formation by skilled climbers. Most climbs up to that time were made on the southeast side of the tower by three different climbing routes.

The tower made national headlines in the fall of 1941 when a stunt by a professional parachutist named George Hopkins went awry. Without prior knowledge or consent of the Park Service, Hopkins parachuted from an airplane to the tower on October 1. His plans to descend by means of a 1,000-foot rope were thwarted when the rope dropped from the plane landed on the side of the monolith, stranding him. Food and blankets were dropped to him while Park Service officials debated rescue alternatives. On October 6, mountain-climber Jack Durrance, a student at Dartmouth College, led a rescue party of seven up the tower. Hopkins was found in good health and brought down with little difficulty. The event received wide publicity and attracted an estimated 7,000 spectators.

Records of the tower climbs have been kept since 1937. The 1,000th climb was recorded in 1963 and since 1977 more than 1,000 people per year have made the ascent using more than 80 described routes to reach the top.

National Park Service Rustic Architecture and Public Works Construction in Devils Tower National Monument, 1933-1940

In any area in which the preservation of the beauty of Nature is a primary purpose, every modification of the natural landscape, whether it be by construction of a road or erection of a shelter, is an intrusion. A basic objective of those who are entrusted with development of such areas for the human uses for which they are established, is, it seems to me, to hold these intrusions to a minimum and so to design them that, besides being attractive to look upon, they appear to belong to and be a part of their settings.

Arno B. Cammerer, Director National Park Service

This philosophy, which appeared in the 1935 Department of the Interior publication, Park Structures and Facilities, had governed architecture within the National Park Service since 1918. Conceived during the formative years of the Service under the directorship of Stephen T. Mather, the resulting architectural style was referred to as "rustic" architecture. The 19th century brought new developments in thinking about the influence that the surrounding landscape had on architectural design. Andrew Jackson Downing, noted landscape architect of the 19th century, published his ideas on "picturesque" landscape and architectural design in his book Cottage Residences. Frederick Law Olmsted, Sr., a student of Downing, emphasized the connection between landscape and architecture by incorporating "natural" materials, such as native stone, log, and timber, into his designs. As building forms blended to their surroundings, it was apparent that landscaping would become an integral part of

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architectural design.

With a focus towards preserving pristine lands, the establishment of the first national parks was a "response to the romanticism that re-structured the American concept of wilderness in the nineteenth century." With the inception of Yellowstone in 1872 and Yosemite in 1890, public lands were reserved for the first national parks. Stephen T. Mather, an 1887 graduate of the University of California at Berkeley and a Sierra Club conservationist, became the director of the Park Service after a lengthy campaign leading to the establishment of the agency. Horace Albright, appointed assistant director to the new agency, held the same beliefs and ideals as Mather for the conservation and use of the park lands. Visiting the parks, Mather and Albright began to formulate the type of architecture that would conform to the wilderness character of the areas. Finding different degrees of development in the parks, it was obvious that a variety of architectural styles had been employed in the construction of park structures. Existing government buildings were small and unassuming, except in some of the earlier parks, such as Yellowstone, where the U.S. Army and the railroad companies had erected permanent structures. Other parks were just as sophisticated in their development. Glacier, for example, had a system of hotels, chalets, and roads as the Great Northern Railway had moved through the areand developed along its route. These hotels, employing such building materials as native stone and logs, were harmonious to the surrounding landscape and terrain. Mather and Albright, through their investigations, reached the conclusion that landscape architecture would be an important element in the evolution of park lands. Working with the American Society of Landscape Architects (ASLA), Mather realized the importance of the relationship between the landscape and designed architecture.

With the growth of the Park Service, a more defined architecture was applied to the earlier vernacular building designs that housed park administration. Mather and Albright began utilizing the ideas of the ASLA and the basic principles of Downing and Olmsted to create a rustic style of park architecture. These architectural precepts would dominate park planning for nearly 30 years.

Introduced in the National Park Service's 1918 "Statement of Policy," the philosophy of Park Service rustic architecture was to harmonize any construction or improvements in the parks with the natural surrounding environment. Through the use of engineers and landscape architects, all improvements were to be carried out in accordance with a preconceived plan developed in special reference to the preservation of the landscape. As the terrain and environment were varied in the parks, it became apparent that a single architectural style would not be appropriate for all of the parks. Following preconceived design plans, administrative and visitor buildings were stylistically adapted to specific environments. The mountainous parks boast styles such as Swiss Chalet or Tudor, as seen in Lake MacDonald Lodge in Glacier National Park, or the LeConte Memorial Lodge in Yosemite National Park. Grand Canyon National Park, with its El Tovar, and many of the other desert-like parks, offer structures of native stone in scale to the surroundings. Although these exemplified resources predate the policy of Park Service rustic architecture, some adherence to principles of landscape and architectural design is obvious.

As the Park Service developed its own rustic architecture, structures such as the Falls Entrance Station in Rocky Mountain National Park and the administration buildings at Zion National Park and Mount Rainier National Park appeared. With little emphasis on man-made characteristics, harmony with landscape was achieved through use of native materials. By incorporating native materials into design and construction, the subordination of the structure to the environment was achieved in several ways. By situating the structure in an appropriate site, secluded or behind natural vegetation, the constructed materials were less of an intrusion to the environment.

William C. Tweed, Laura E. Soulliere, and Henry G. Law. National Park Service Rustic Architecture: 1916-1942, p. 1.

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Structural elements of the design were important to keep the building in the proper scale and perspective. In high, mountainous areas, such as Yosemite and Yellowstone, an emphasis on over-scaling of the materials and size was a predominate design influence so the building would not be dwarfed in the presence of the surrounding trees and rough terrain. In lower, less rugged areas, there was not a crucial need for the design to be oversized. A focus was placed on the choice of building materials and placement of the structure. An emphasis on horizontal lines, as opposed to more conspicuous vertical lines, helped to keep roof lines low and unobtrusive in the non-mountainous terrain.

By the time that rustic architecture had become an accepted element to park planning, the Park Service had acquired a great deal of land for public use. Many national parks were instated and visitation rose as the automobile made travel accessible for a large part of the population. To accommodate the influx of visitors, the Park Service recognized the need to develop service and information areas, as well as roads and trails. During the 1930s, developments at Devils Tower National Monument were planned by the Landscape Engineering Division, Branch of Plans and Design. With the assistance of the Civilian Conservation Corps (CCC) and the Public Works Administration (PWA), the Park Service accomplished a great deal of development and improvement within the national park areas.

Franklin Delano Roosevelt, inaugurated into presidential office on March 4, 1933, was faced with the Great Depression and thousands of unemployed citizens. In a solution to alleviate the unemployment problem, President Roosevelt established the agency for Emergency Conservation Work (ECW), popularly known as the Civilian Conservation Corps. (On June 28, 1937, the Civilian Conservation Corps was formally established as an independent agency, with all ECW records and property transferred to it.) Introduced on March 21, 1933, the Federal Unemployment Relief Act was enacted on March 31, 1933. Encouraged by his long interest in forestry and conservation of natural areas, Roosevelt proposed to utilize the manpower of 250,000 men in public work projects. Work undertaken by the ECW during its first year included forest improvement projects, construction and maintenance of fire breaks, clearing of campgrounds and trails, construction of fire and recreation structures, road and trail building, forest fire suppression, survey work, plant eradication, erosion control, bridge building, flood control, campground construction, and landscaping. 12

With available labor, the Park Service, along with many other government agencies, was able to develop and construct many administrative facilities. As stated by Conrad Wirth, departmental representative on the CCC Advisory Council and subsequently the director of the National Park Service (1951-1969):

The Civilian Conservation Corps advanced park development by many years. It made possible the development of many protective facilities on the areas that comprise the National Park System...[which] benefited immeasurably by the Civilian Conservation Corps. The CCC also provided the manpower and materials to construct many administrative and publicuse facilities...restore historic sites and buildings...and to do many other developmental and administrative tasks that are so important to the proper protection and use of the National Park System. The CCC made available to the superintendents of the national parks, for the first time, a certain amount of manpower that allowed them to do many important jobs when and as they arose. Many of these jobs made the difference between a well-managed park and one "just getting along." 13

In addition to the ECW and CCC workers, park superintendents often employed the services of Local Experienced Men (LEMs), individuals that were trained and skilled

¹² John C. Paige. The Civilian Conservation Corps and the National Park Service, 1933-1942, p.18.

¹³ Conrad L. Wirth. Parks, Politics and the People, p. 147.

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in specialized traits. The LEMs trained the CCC enrollees in the decorative techniques when finishing a project. Skilled in such areas as carpentry and masonry, the LEMs not only taught the CCC enrollees, but also aided in the executing decorative features.

Public Works Programs and the CCC at Devils Tower

While a CCC camp was not established at the monument until 1935, development activity ensued immediately after the passage of the Federal Unemployment Relief Act in early 1933. Custodian Joyner reported to the NPS director in January 1935:

This is my first report since that for May 1933. The sudden increased activities because of the advent of Public Works at that time, the subsequent continuance of such emergency work, as well as the fact that for over a year I had no clerical help, caused me to take advantage of your implied concurrence with my statement that it would be impossible to forward these [monthly] reports to you. As this report will bring out, we have been extremely busy with projects under the PWA, CWA, and ERA. This period of activity has been extremely interesting and the developments are now reaching a point where we can present most of the minimum requirements as far as standard convenience for our visitors are concerned. 14

In his report, Joyner said that the projects had substantially helped with the local labor situation: "During summer of 1933 the plight of the residents of this agricultural region was severe. Our projects helped considerably by providing employment for some two hundred men during the fall. We attempted to spread the work as much as possible by changing crews."

Joyner reported that in 1933 and 1934 the monument employed 338 different men, or about 30 percent of the wage earners of the county. During this period, much groundwork was laid for the next phase of development, which soon would occur under the CCC era of the monument. The "Field Headquarters" (Western Division of the National Park Service, Branches of Engineering and Plans and Design, based in San Francisco, California) drew up plans for the combined administration building/museum, associated water and sewer system, and parking area; entrance road; boundary fence and cattle guards; and fire protection water system. The boundary fencing, cattle guards, and developments at Springs No. 2 and 3 for fire protection were all constructed during this period. ERA crews also "brushed out and repaired some old trails for use as fire truck trails," providing ready access to "practically every point on the monument," Joyner noted. A topographic map of the monument was also prepared by the United States Geological Survey (USGS) during this period.

Joyner ended his 13-page January 1935 report by announcing, belatedly, "On August 13, 1933, a "Custodianette" came to our house to stay. Her name is Jean Marie and although it seems like ancient history now, I feel that it should be mentioned along with other important events listed above." The child Jean Marie appears in several historic photographs in the ensuing years, such as one showing her standing atop a massive sandstone block during CCC installation of the stone walkways surrounding the headquarters parking area.

Historian John Daugherty wrote in his study of the monument, "The construction of a Civilian Conservation Corps (CCC) Camp was the most important development in 1935. Plans for the camp included a headquarters building, a hospital and storage building, a mess hall, a bath house, a latrine, quarters for officers and foremen, and five buildings to be utilized as barracks." The establishment of the CCC camp at Devils Tower, Camp NM-1-W, was indeed a most important event, enabling the execution of

Newell F. Joyner, monthly report to NPS Director, January 1935.

¹⁵ Daugherty, p. 29.

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existing NPS plans and the drawing up of still more. A historic photograph, appended to this cover form, depicts the CCC camp, which was located on the banks of the Belle Fourche River just east of the monument's current administration building (see also appended 1934 Base Map section). In conjunction with the camp's construction in 1935, a large-scale cribbing project was undertaken along the north bank of the Belle Fourche to protect the new camp "and possible eventual loss site of entrance road." 16

CCC Company No. 3851 was the first to occupy the new camp, which they did during the first week of August 1935. They left at the end of October, followed in November by Company No. 2555, "made up of boys from Kentucky, mostly from the coal-mining regions of the southern part of that state," according to Joyner's monthly report to the director for November 1935. Joyner tactfully observed that, "Theirs is an altogether different psychology than we have previously met, but by the end of the month they had become acclimated to life in the camp and to the work projects." Company No. 2555 was 219 strong, with "a number of extremely young boys" in the group, reported Joyner. On a more positive note he reported, "We were extremely fortunate in securing a group of LEM's practically everyone of whom is capable of acting as a Leader in the field. Two of them are distinctly of foreman caliber.... Whatever degree of efficiency we have attained in the work here is due largely to the availability of such a fine group of LEM's."

On April 1, 1936, most of the boys from Kentucky returned home, with about 66 remaining. On April 14, Custodian Joyner later reported to the director, 98 enrollees ("all Ohio boys") were moved into the camp. These boys, he observed, were "very good workers and most...have had all at least some high school work; just the reverse of the past two groups."

The progress made at Devils Tower National Monument since 1933 was summarized in Joyner's monthly report for December 1939 to Director Arno B. Cammerer:

Announcement that the unexpended balances from the 1940 ERA funds would not be available leads us to review the work accomplished during the past seven years, during which time the CWA, ERA, PWA, Roads and Trails funds, CCC and the recent ERA-WPA program have provided many facilities of value from the standpoint of administration and visitor use.

Joyner further described the improvements made under these New Deal programs:

It is gratifying...to realize the extent of our progress from an area serving 10,000 visitors in 1932, and providing a spring a quarter of a mile from the camping and picnicking spot (and the residence), a dirt road often made impassible by weather conditions, a small remodeled automobile shelter served as an office, a couple of pit toilets, and a small residence for the custodian. Today our road is all-weather and the scars of construction have been removed, the parking area, picnic ground and camp ground have been developed so that their utilization will not be destructive to the natural features, a utility area, housing in a satisfactory manner, various administrative functions and out of sight of the visitor for the most part is in existence, the residence has been remodeled to provide suitable quarters for a custodian, office and museum facilities have been provided, water has been piped to the residence, camp ground, picnic ground and comfort stations have been installed...all of these improvements, so necessary and so desirable, have introduced many complexities which did not exist seven years ago. 18

 $^{^{16}}$ Newell F. Joyner, monthly report to NPS Director, May 1936.

¹⁷ Ibid.

 $^{^{18}}$ Newell F. Joyner, monthly report to NPS Director, December 1939.

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Elsewhere in this report Joyner noted, "With the exception of January and February, 1938, this is the first winter month since March 1933 which a major portion of the Custodian's time was not devoted to some construction or emergency program."

In addition to the projects reported above by Joyner, the three-mile long, 20-foot wide approach road to Devils Tower was reconstructed, oil surfaced, and landscaped over a period of years from 1933 to 1938, and a one-mile long foot trail was constructed around the base of the tower in 1936. According to a report by Landscape Architect Sam Serrano, the CCC camp at the monument was disbanded at the end of the 9th Period on September 30, 1937. Documentation indicates that a 4.5-mile long nature trail was completed in 1940, making it one of the last projects completed prior to the end of ERA funding.

The historic buildings and structures which date to this era of the monument's history are significant examples of the work executed as a direct result of President Roosevelt's New Deal programs. No other period would be as important in national park developments until Mission 66, the ten-year long, service-wide program initiated in 1956. In Devils Tower National Monument, examples of Park Service rustic design architecture executed by the Civilian Conservation Corps are located in the Old Headquarters Area Historic District (the museum/visitor center, custodian's residence, and fire hose house), and at the monument's entry (the entrance station), all constructed with Emergency Relief Act funds. Reconstruction of the monument's entrance road was initiated under public works programs and completed by the CCC. These projects represent the most significant period of the monument's development prior to World War II, illustrating the important impact of public works programs on national parks and monuments. Through use of public work program funds and the available labor of the CCC and LEMs, the Park Service was able to improve and construct needed facilities using preconceived ideas originating in the Landscape Engineering Division and the Branch of Landscape and Design.

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Item F - PROPERTY TYPES AND REGISTRATION REQUIREMENTS

Resources Associated with Early Recreation

Description of Resources Associated with Recreation

Resources in this category include the tower ladder and historic trails. The wooden stake ladder was constructed to facilitate the first known human ascent of the tower in 1893 by William Rogers and Willard Ripley. The tower has been a popular (and technically challenging) climbing destination for thousands of people since that time. The development of hiking trails was limited during the historic period, but included the tower trail and a 4.5 mile-long nature trail.

Significance of Resources Associated with Early Recreation

Resources in this category are significant for their association with activities which have grown in popularity from the first ascent of Devils Tower to the present day -- rock climbing and hiking. Hiking trails were designed to provide the visitor access to scenic views and natural features in the park. Trail design of the historic period reflects the naturalistic philosophy practiced by the National Park Service.

Registration Requirements for Resources Associated with Early Recreation

Properties included in this category may be listed under Criteria A and/or C. Resources must retain integrity of location, design, setting, workmanship, feeling and association in order to qualify for the National Register. Integrity of materials is not considered essential for qualification if extant materials are similar to those used in the original construction, and the method of construction is likewise the same (e.g., the reconstructed tower ladder).

Trails must meet the requirements set forth in Item F of Linda McClelland's multiple property submission cover form, pp. 192-195. (See also "Trails Systems" subtype, p. 181.)

Resources Associated with NPS Administrative Development

Description of Resources Associated with NPS Administrative Development

Resources of this category include buildings and structures, the latter having four subtypes. Buildings include a district of three buildings, known as the Old Headquarters Historic District, and the Entrance Station. These buildings were constructed to provide an entrance checking station; to house Park Service personnel; to provide space for an administration office, museum, public restrooms; and to house fire fighting equipment. Most early building developments were sited near Devils Tower, an area heavily used by park visitors.

Structures include two subtypes:

Water and Sewer Systems - associated with the administrative infrastructure at the Old Headquarters Area and fire suppression in the entire monument. Resources of Springs No. 1, 2, and 3 were used either for domestic use, visitor restrooms, and/or fire suppression.

Park Road Systems - associated with transportation and administration of the monument. The roads constructed under the authority of the Park Service can also be divided into two functional categories. The majority of the roads were secondary, unpaved "truck trails," used for administrative access to backcountry areas in the event of fire. The park's single primary road, Highway 110, was the route used by visitors and others traveling to Devils Tower.

Significance of Resources Associated with NPS Administrative Development

Properties included in this category may be listed under National Register criteria A and C, and will likely be significant at the local level. With specific regard to criterion A, the infrastructure developed by the Park Service clearly reflects the

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range of activities in which its personnel were involved during the historic period. Buildings and structures indicate the types of services offered to the public and the character of facilities available for park employees. In addition, resources exemplify the impact on national parks and monuments that the New Deal era programs had, and the high quality of workmanship exhibited in the execution of Park Service architectural and engineering plans.

Individual buildings and districts are representative of the National Park Service rustic style of architecture, and therefore eligible under criterion C. Architects working for the NPS Branch of Plans and Design created many buildings for the western parks. Moderate in scale and unobtrusive in design, most of these buildings were designed to blend with or complement the natural elements of the western landscape. Within Devils Tower National Monument, NPS-designed buildings include both log and stone, which impart a rustic appearance.

Road systems are representative of the National Park Service rustic design philosophy as applied to landscape architecture and engineering projects in the 1930s. Roads provided entry to the park and access to its scenic features and recreational areas. (See Item F of Linda McClelland's multiple property submission cover form.)

Designed landscapes minimized the construction scars and enhanced the settings of developed areas. Plantings (or transplantings) of native materials sought to create the illusion of an undisturbed area. Designs and plans that emphasized naturalistic principles were executed and overseen by Park Service landscape architects in the Western Division (described in McClelland's multiple property submission cover form).

Registration Requirements for Resources Associated with NPS Administrative Development

In order to qualify for listing in the National Register of Historic Places under criteria A and C, NPS buildings and structures must possess integrity of design, materials, and workmanship as these concepts relate to exterior surfaces. Buildings should also occupy their original locations, and the setting of district configurations should not be compromised by the addition of intrusive elements. Integrity of location and setting is also critical for individual buildings eligible under both these criteria. Interiors can contribute to the significance of a specific building, if the original floor plan and majority of interior surface finishes have been retained. However, the eligibility of a district or group of buildings (which has already been established) will not depend upon whether or not the interiors of individual buildings retain integrity. Water and sewage systems should have all associated structures intact, including above ground buildings.

Roads must meet the requirements set forth in Item F of McClelland's multiple property submission cover form, pp. 192-195. (See also subtype, "Park Road Systems and Parkways," pp. 178-181.)

Designed landscaped areas must meet the requirements set forth in Item F of McClelland's multiple property submission cover form, pp. 192-195. (See also subtypes "Major Developed Areas and Park Villages," pp. 182-183.) Minor developed areas such as picnic areas and campgrounds must also meet these requirements (See McClelland, pp. 183-184.)

Item G - GEOGRAPHICAL DATA

All of the resources included in this submission are located wholly within Devils Tower National Monument, Crook County, Wyoming.

¹⁹ This would include finishes that represent "replacement in kind" or the use of materials that present an appearance that is similar to the historic appearance.

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Item H - SUMMARY OF IDENTIFICATION AND EVALUATION METHODS

The multiple property listing of historic and architectural resources of Devils Tower National Monument is based upon two surveys of the park's historic resources conducted by NPS Historian Kathy McKoy during June 30-July 3, 1993, and March 13-17, 1995. The survey identified four historic buildings (three buildings in the Old Headquarters Area and the entrance station) and two historic structures (the tower ladder and the entrance road) as eligible for the National Register. Documentation on other park roads, trails, the historic water and sewer system, and river control structures was collected for purposes of preparing Determination of Eligibilitys for those resources that failed to meet the National Register eligibility criteria. 20 The overall landscape in the Old Headquarters Area (the parking area and sites of the original campground and picnic area) was also studied on site, comparing it to early plans executed there. (Due to lack of qualified personnel, a plant survey and analysis was not undertaken in connection with this survey.)

Most photographs of resources were taken on the first site visit in 1993. Documentation for the survey gathered at the park was obtained from park property, maintenance, and administration files, and park document and photographic archives. Primary sources included official correspondence, reports, historic photographs, maps, design and construction drawings, and historic master plans and development outlines. Principal secondary sources included later management documents (General Management Plans, Master Plans, Resource Management Plans, and Development Outlines), and two histories of the monument (John Daugherty and Ray H. Mattison, both cited in Bibliography).

A partial survey of the monument's main entry road was made, but did not at that time include identification and/or mapping of existing original culverts, headwalls, and retaining walls due to time, budget, and personnel constraints. It was apparent that a number of road features date from the historic period. Most are modest in scale, associated with road drainage, and executed in stone.21 The majority of documentation related to roads and trails was gleaned from primary source material, such as reports by the custodian and by landscape architects overseeing construction projects. Historic master plans and maps were also heavily utilized in comparing existing conditions with those of the historic period.

In evaluating the roads, trails, and designed landscapes of the monument, the principal source consulted in 1995 was Linda McClelland's Presenting Nature - The Historic Landscape Design of the National Park Service, 1916 to 1942 (cited in Bibliography). Plans executed by the Western Division's Branch of Plans and Design for landscaping were compared with existing conditions in the Old Headquarters Area in particular. Detailed reports made by Landscape Architects Sam Serrano and Howard W. Baker to the NPS chief architect were essential in tracing the developments of the period. In addition, they provided solid documentation that the prevailing Park Service naturalistic landscape design philosophy strongly influenced all construction and revegetation efforts undertaken during this era of rapid development.

During the second site visit in 1995, the surveyor (McKoy) interviewed Park Service staff in the monument's maintenance division. One in particular, Paul Conzelman, had a long history with the park, kept a private diary/log of monument developments, and provided excellent information on events impacting resources which had taken place form the 1960s through 1995. Research during the second site visit concentrated on

 $^{^{20}}$ A Determination of Eligibility (DOE) was submitted for the river control structures in 1995. The Wyoming State Historic Preservation Office concurred with the DOE that the structures did not meet National Register criteria for listing, thus they were not considered as a property type in this submission. Also in 1995, the WYSHPO concurred with a DOE for two trails, "Tower Trail" and "South Side Trail," which evaluated them as ineligible.

21 A May 1999 List of Classified Structures survey (LCS #51314) has since documented individual features

of the entrance road.

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the water and sewer system, river control structures, roads and trails, and landscape issues. The NPS Western Division's Branch of Engineering and Branch of Plans and Design were heavily involved in all aspects of design and construction of projects during the 1930s, both prior to and during the assignment of CCC companies to the monument. The monthly reports of landscape architects and other Western Division staff who visited or worked in the monument, were a rich source of information.

In conjunction with the survey, inventory forms were completed for all historic buildings and locations of resources were marked on USGS topographic maps. A historic archeological site (the Graham cabin) was visited, along with several rock sites containing inscriptions, the majority of which postdated the monument's creation. No documentation was prepared for the cabin site as part of this nomination; the two graffiti sites visited (one near the tower, the other near the Graham cabin site) appeared to contain inscriptions made by monument tourists who had wandered off established trails and left their "John Henrys" on a number of vertical sandstone outcroppings. These inscriptions did not meet National Register criteria for historical significance nor did the surveyor feel they warranted preparation of a formal Determination of Eligibility. (A memo containing some descriptive information on the graffiti sites was submitted by the surveyor to the park for their files.)

The documentation collected during the two site visits was reviewed, analyzed, and draft nominations were prepared by the surveyor over a two month period during December 1995 and January 1996. Additional supporting documentation was obtained from the Denver Service Center's Technical Information Center files and the Denver regional office's historic resource notebooks.

The properties are grouped under four historic contexts that conform to the major themes that best define the monument: 1) Recreation and Tourism at Devils Tower National Monument, 1880s-1950; 2) Administration and Development of Devils Tower National Monument, 1906-1950; and 3) National Park Service Rustic Architecture and Public Works Construction in Devils Tower National Monument, 1933-1940. In addition, certain roads, trails and historic designed landscapes were evaluated under a fourth historic context, "The Historic Landscape Design of the National Park Service, 1916 to 1942," in Linda McClelland's multiple property nomination, Historic Park Landscape in National and State Parks.

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 Monument master plans, 1936-1939
 General Development Plan for CCC Camp, Branch of Plans and Design, May 20, 1935
 (#D402)

Additional Documentation

Construction Drawings, Entrance House Rehabilitation, #109/80,042; 6/18/99
A photocopy of a historic photograph of the CCC camp and locational map section indicating its original location are appended to this report.