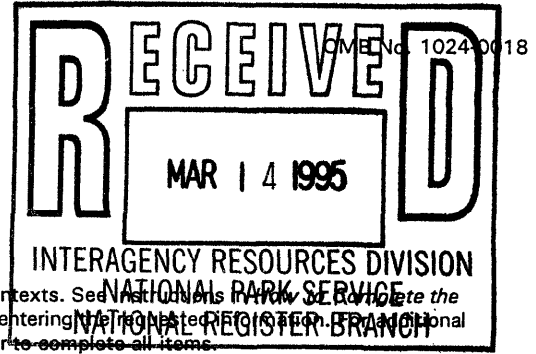


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National Register of Historic Places Multiple Property Documentation Form

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

New Submission Amended Submission



A. Name of Multiple Property Listing

Bryce Canyon National Park Multiple Property Submission

B. Associated Historic Contexts

(Name each associated historic context, identifying theme, geographical area, and chronological period for each.)

- 1). **Development of Recreational and Administrative Infrastructure in Bryce Canyon National Park 1924-1944. Subthemes include Concessioner Development in BRCA, 1924-1944 and National Park Service Administrative Development within BRCA 1928-1944.**
- 2). **Influence of landscape architecture on National Park service facilities and the development of rustic building design.**

C. Form Prepared by

name/title **Janene Caywood/Associate Archaeologist**

organization **Historical Research Associates, Inc.**

date **December 31, 1994**

street & number **P.O. Box 7086**

telephone **(406) 721-1958**

city or town **Missoula** state **Montana**

zip code **59807-7086**

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.)

Samuel Lockwood 3/14/95
Signature, Federal Preservation Officer Date

Federal agency: **National Park Service**

Max Fleck 2-9-95
Signature and title of commenting official, SHPO Date

State agency: **Utah State Historic Preservation Office**

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.

Christina Allee 4/25/95
Signature of the Keeper Date of Action

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**CONTEXT 1: DEVELOPMENT OF RECREATIONAL AND ADMINISTRATIVE INFRASTRUCTURE IN
BRYCE CANYON NATIONAL PARK, 1924-1944**

Introduction

Bryce Canyon National Park (BRCA) is, and has always been, valued primarily for its natural, *scenic* resources. However, in the process of promoting and making accessible the natural geological and scenic qualities of the area, park administrators and concessioners created a small but historically significant built environment. Today, these *cultural* resources include the buildings, structures, travel paths and support facilities developed to accommodate NPS administrative and concessioner activities within the park.

The establishment of concessioner and administrative facilities within Bryce Canyon National Park (BRCA) mirrors similar development in many of the other western parks. Prior to the time that the National Park Service (NPS) established a formal internal architectural review policy, concessioners generally operated with a free hand in terms of the design and layout of improvements. Later, especially after establishment of the Landscape Division, the NPS began to wield more control over the character and design of tourist facilities.

In part, the change to stricter control over concessioners development stemmed from the changing needs of the American tourists, to which the NPS responded. Since many of the original park concessioners were subsidiaries of railroads, a paramount consideration on the part of the concession was to increase railroad travel. As more Americans acquired automobiles, patterns of tourism changed. The majority of guests no longer arrived in the parks via railroad. Using their own vehicles, they toured the country freely, unrestricted by railroad timetables. Auto-tourists also tended to require simpler, less expensive accommodations. Since the railroads received no direct benefit from these guests touring the park, their subsidiaries did not acquiesce easily to the demand for new types of facilities. The NPS exerted pressure on concessioners to create more economical facilities (e.g., cafeterias and housekeeping cabins), thus this agency's maturing internal policy assured that it could administer the parks according to the needs of the American public.

The entry of the United States into World War II arrested facilities development within the national parks system. The personnel and monetary resources once attributed to New Deal projects in general and to parks development in particular were absorbed into the war effort. Further significant enhancement of park facilities would not take place until the creation and implementation of the "Mission 66" program, during which both visitor and administrative facilities once again received attention and upgrading.¹

¹ The NPS's Mission 66 program was a nation-wide project, implemented in 1956. The purpose of the program was to study all aspects of NPS operations, identify needs and deficiencies, and prepare plans to address those needs. Resolution of needs identified through Mission 66 studies manifested in many different forms including the development of new NPS and concessioner

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Bryce Canyon Before the Establishment of the Park

Little development occurred within the area now known as Bryce Canyon National Park until the first decade of the 1900s. Although Spanish explorers and traders traveled in the region there are no records of Spanish exploration within the park proper. Also, it seems likely that early fur trappers and traders would have passed through the region between 1800 and 1850, since the Piauxes called the Paunsaugunt Plateau the "home of the beaver." Yet, extant trappers' journals, letters, and reports do not specifically mention the Bryce Canyon area.²

Similarly, the prospectors and entrepreneurs who fueled the western mining frontier, and opened to settlement many remote areas of the western United States during the 1850s and 1860s, found little of interest in the BRCA vicinity. The intricately carved geological formations lacked sufficient mineral resources. Consequently, the Bryce Canyon area was left untouched by prospectors.

During the 1850s, Brigham Young directed his followers to establish religious colonies in southwestern Utah. The missionaries found the Bryce Canyon area to be inhospitable and generally unsuited for farming. Seasonal early and late frosts associated with the high altitude made crop production risky. Yet, luxuriant native grasses proliferated on top of the Paunsaugunt Plateau and in the canyon bottoms below the plateau rim. These would eventually provide settlers in the adjacent valley with an area that was well suited for grazing.

In 1891, settlers located in the area now known as Tropic near the head of the Paria Valley. Tropic, located at an altitude considerably below the Paunsaugunt Plateau, served as the community center for the surrounding farms and ranches. Several of Tropic's first citizens, realizing the importance of irrigation to the survival of the community, constructed an elaborate ditch system that tapped the waters of the East Fork of the Sevier River and carried it eastward over the plateau rim to provide irrigation water to the town of Tropic and outlying areas.³ Tropic Reservoir, located

¹(...continued)

facilities — (campgrounds, housing units, motels, administration buildings, interpretive programs, etc.). The target date for completion of the program was 1966, the 50th anniversary of the NPS, hence the name "Mission 66."

² Herbert E. Gregory, "Geologic and Geographic Sketch of Bryce Canyon National Park," *Zion-Bryce Museum Bulletin*. No. 4, March 1940, p. 9.

³ Ole Ahlstrom, "The Early Days of Tropic," (November 27, 1935), File: Area History File, Library, Bryce Canyon National Park, Utah; A. J. Hansen, "Tropic, How She Came Into Existence (sic)," (n.d.), File: Area History [loose leaf notebook], Library, Bryce Canyon National Park, Utah.

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on the East Fork of the Sevier River, impounds water for the ditch. The Tropic ditch system continues to provide irrigation water to the town of Tropic and the surrounding ranches.

The rugged topography, which had deterred early Euro-American travelers and settlers, attracted the interest of American scientists during the 1870s. The significance of the area's geology and aesthetic qualities was not lost on these scientific pioneers.

In 1872 Almon H. Thompson, a geographer working under Maj. John Wesley Powell, conducted the first scientific traverses of the Paunsaugunt and Aquarius plateaus. Thompson's 1872 report provides the first description of the complex geologic features that characterize southwestern Utah. In the narrative detailing his journey, Thompson described the rim of the Paunsaugunt Plateau as consisting of "cliffs that show a beautiful pink color and for the upper 2,000 feet present bold perpendicular faces." Thompson marveled at the "innumerable canyons that widen into little alcove-like valleys...rock walled and covered with growths of grass, canes and willows."⁴ Other scientists, including Edwin Howell, Grove Karl Gilbert, Clarence Dutton and Lt. W. L. Marshall, followed Thompson and conducted surveys in the area during the 1870s. Dutton wrote in his work entitled "The Geology of the High Plateaus of Utah" that the Pink Cliffs were the "glory of all this rock-work," of the Utah plateaus. He likened the Bryce amphitheater to the ruins of a great classical city.⁵

In 1876, U.S. Deputy Surveyor T. C. Bailey, who surveyed the area for the General Land Office, wrote that:

Immediately east and south of the last corner set, the surface breaks off almost perpendicularly to a depth of several hundred feet — seems, indeed, as though the bottom had dropped out and left rocks standing in all shapes and forms as lone Sentinels over the grotesque and picturesque scene. There are thousands of red, white, purple and vermillion colored rocks, of all sizes, resembling Sentinels on the Walls of Castles; monks and priests with their robes, attendants, cathedrals, and congregations. There are deep caverns and rooms resembling ruins of prisons, Castles, Churches, with their guarded walls, battlements, spires and steeples,

⁴ Gregory, "Geologic and Geographic Sketch of Bryce Canyon National Park," p. 10; Richard A. Bartlett, *Great Surveys of the American West* (Norman: University of Oklahoma, 1962), pp. 314-315.

⁵ Gregory, "Geologic and Geographic Sketch of Bryce Canyon National Park," p. 11.

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niches and recesses, presenting the wildest and most wonderful scene that the eye of man ever beheld, in fact, it is one of the wonders of the world.⁶

Although these early scientists and surveyors found much to praise about the area, its aridity and ruggedness slowed settlement.

Bryce Canyon may have been a "wonder of the world" to early scientists and surveyors, yet even in the early 1900s it remained a hidden treasure, far-removed from the public eye. For those who had viewed the erosional features below the plateau, it was potentially a pleasure park that would draw persons from around the world to study its geology, to view its unexcelled natural beauty, and to enjoy its solitude. But before that potential could be realized, the land had to be secured and made accessible to the public.

First, in order to secure a public park and at the same time to prevent the destruction of its natural features, advocates worked for the creation of a national park with a focus on the natural aesthetics and history of the area. Second, in order to promote the park, to make its features accessible, and to provide facilities and services for the public, the federal government, Utah State tourist and transportation agencies, and the Union Pacific Railroad joined to improve roads to the park. They also worked to organize a transportation system, and to construct auto and tourist facilities. The concessioner facilities developed to meet tourist requirements included a lodge, a variety of cabins, campgrounds and support facilities. By their scale, location, materials, and color, these facilities, and those constructed by the NPS, were designed to prevent visual intrusion upon the landscape. Today, the built environment and other improvements within BRCA reflect the development of the park for its recreational opportunities and administration.

Setting Aside the Park

In July of 1915, J. W. Humphrey, former Forest Supervisor for the La Sal National Forest with headquarters at Moab, Utah, assumed a new position as Forest Supervisor for the Sevier National Forest,⁷ headquartered in

⁶ T. C. Bailey, Deputy Surveyor, excerpt from General Land Office field notes for T36S, Ranges 3W and 4W, Public Survey Office of Surveys, Bureau of Land Management, November 1876, *Survey of the Guide Meridian, through T. 36 S., Rs. 3 and 4 W., Salt Lake Meridian, Utah*, File: Legislation re: Lands, Extension of Bryce Canyon Boundaries, Drawer 4, Temporary Storage files, Bryce Canyon National Park, Utah.

⁷ In 1922, all federal lands administered by the Sevier National Forest were formally transferred to the Dixie and Powell National Forests. The name of "Sevier" National Forest was discontinued at this time. This transfer was accomplished by Executive Orders 3635 and 3636.

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Panguitch, Utah. During the weeks before he assumed his new responsibilities, Humphrey visited the national forests that he would be responsible for in his new position. Humphrey wanted to acquaint himself with the geology of the area and to meet with local United States Forest Service (USFS) personnel.

During Humphrey's orientation tour, Elias Smith, the District Ranger at Panguitch, invited him to take a side trip to view the wonders of Bryce Canyon. Humphrey at first declined since at Moab he had become well acquainted with the spectacular regional geology, typified by the "present-day" Canyonlands and other equally impressive geologic formations along the Colorado River. Humphrey doubted that the scenery at Bryce Canyon could be more distinctive than the geological formations that he had enjoyed in his former position.

Ranger Smith persisted, however, and Humphrey reluctantly rode the trail to the rim of Bryce Canyon. The vista so impressed and surprised Humphrey that he remained at the rim until late in the evening. Upon his return to Panguitch, Humphrey immediately began preparing plans to make the area accessible to the public.⁸ Humphrey's actions represent the first official steps taken towards the establishment of what would become Bryce Canyon National Park.

Immediately upon his return to Panguitch, Humphrey began promoting the area as a principal tourist attraction in southern Utah. Since much of the scenic area was within national forest boundaries, its administration was within Humphrey's jurisdiction. With a small appropriation he built a primitive road to the plateau rim. He located expert photographers to take promotional pictures, which he sent throughout the country and made available to tourists on their way through southern Utah.

In 1916 Humphrey and Arthur W. Stevens sent promotional material and photographs of Bryce Canyon to the Denver & Rio Grande and the Union Pacific (UP) railroads. Officials of the Denver & Rio Grande expressed little interest in developing the tourist trade to this region. However, Union Pacific personnel responded favorably and UP officials began assessing the commercial potential of the Bryce Canyon area.

In 1917 Humphrey secured an appropriation to construct both a trail from the rim of the plateau into the canyons below and a system of trails within the eroded "hoodoos"⁹ below the plateau rim. Humphrey also instituted and led

⁸ J. W. Humphrey, "Early Development of Bryce Canyon," presented at a meeting of the Associated Civics Clubs of Southern and Eastern Utah at Ruby's Inn, September 26, 1959, (later revised by J. W. Humphrey), file: Bryce Canyon Archives History file, Library, Bryce Canyon National Park, Utah.

⁹ Hoodoos are free standing rock pinnacles formed by natural erosional forces.

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guided tours of the area below the rim that originated at Panguitch. About 65 people accompanied Humphrey on his first trip, and thereafter, the number of people increased with each tour.¹⁰

By the late 1910s, Humphrey's promotional efforts began attracting outside interest. On August 5, 1918, O. H. Grimes, a columnist for the *Salt Lake Tribune*, wrote a vivid account of Bryce Canyon's beauty. Two months later, *Scientific American*, a prominent literary journal of the day, published an article written by LeRoy Jeffers that extolled the scenic values and the geologic wonders of the Bryce Canyon area.¹¹ These articles, coupled with Humphrey's publicity campaign, resulted in a groundswell of public support for protecting the area. Businessmen in the region surrounding Bryce Canyon initiated a drive to preserve the resource.

Encouraged by these promotional efforts and growing public support, Utah Governor Simon Bomberger and the state legislature sent a memorial to Washington on March 13, 1919, urging Congress to act to reserve the Bryce Canyon area for a public park. The petitioners indicated that the land surrounding and within the proposed park was part of the "public domain," in the "Pink Mountain" region near the Sevier River. They indicated that the local people referred to the area as "Bryce's Canyon" and they said that it had

become famed for its wonderful natural beauty. Inasmuch as the State and the Federal Governments have indicated a desire that the natural attractions of our State and our Country be protected and preserved for the enjoyment of posterity, therefore, your memorialists respectfully urge that the Congress of the United States set aside for the use and enjoyment of the people a suitable area embracing Bryce's Canyon as a national monument under the name of the "Temple of the Gods National Monument."¹²

¹⁰ Ibid.

¹¹ Angus M. Woodbury, *A History of Southern Utah and Its National Parks*, Utah Historical Quarterly, Vol 12, No. 4, October 1944, pp. 201-202. Horace Albright, Assistant Director of the National Park Service, had heard of Bryce Canyon when he visited Zion and Mukuntuweap Canyon in 1917. When he read Jeffers' article, he looked into the possibility of establishing Bryce Canyon as a national monument. However, Park Service Director, Stephen Mather, did not agree with Albright and thought that Bryce should be established as a state park.

¹² Quoted in Gregory, "Geologic and Geographic Sketch of Bryce Canyon National Park," p. 13.

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On November 3, 1919, Utah Senator Reed Smoot responded to the petitioners by introducing a bill to establish "Utah National Park" at Bryce Canyon.¹³ The lands included in Smoot's bill consisted of 7,280 acres, yet the boundaries outlined in his legislation failed to include lands considered to be worthy of inclusion by some officials.

In a letter to Senator Smoot on April 22, 1920, Secretary of the Interior John Barton Payne agreed that the "area covered in the impending bill should be at once brought under full national contract and protection." However, Payne believed that the area should be established immediately as a national monument by Presidential proclamation rather than as a national park. He argued that later, once the surrounding area had been investigated, Congress could enlarge the reserved area into a national park.¹⁴

At Bryce Canyon the issue of future administration was becoming critical as the numbers of tourists grew. Ruby Syrett, who had located a homestead a few miles from the plateau rim, began providing food, shelter, and other services to tourists in 1919. In 1920 he constructed a lodge, known as "Tourists' Rest," on state lands near the rim.¹⁵ Furthermore, the Union Pacific Railroad had initiated plans to develop tourist facilities on their grant lands located near Zion National Park and other scenic areas in southern Utah.

In December, 1922, the principal proponents for developing the recreational potential of the Bryce Canyon area met in Senator Smoot's office.¹⁶ As a result of the meeting, Senator Smoot agreed to support the immediate creation of Bryce Canyon National Monument to be administered by the USFS. Smoot did not, however, abandon his plan to create Utah National Park at Bryce Canyon.¹⁷

¹³ Senate Bill 3379, November 3, 1919 66th Cong., 1st Session; Nicholas Scratish, *Historic Resource Study: Bryce Canyon National Park* (Denver: National Park Service, 1985), pp. 74-75.

¹⁴ Bryce Canyon Legislation. File: Miscellaneous, Drawer 4, Curatorial Files, Bryce Canyon National Park, Utah. A national monument could be established by executive order under the terms of the Antiquities Act of 1906. However, only Congress could create a national park. In order to give some protection to the canyon, it was necessary to act quickly.

¹⁵ Scratish, *Historic Resource Study: Bryce Canyon National Park*, pp. 21-22, 210-211. Scratish demonstrates that Syrett never had a legal claim to the land he used in Section 36. In 1923 he sold his improvements to the Utah Parks Company. Syrett purchased additional land near his homestead claim and developed a tourist enterprise outside the boundary of the park.

¹⁶ *Ibid.*, p. 75. Those in attendance were Senator Smoot, Union Pacific Railroad General Traffic Manager W. A. Basinger, Acting National Park Service Director Arno B. Cammerer and Assistant Director Horace Albright, Utah General Land Office Commissioner Spry, Utah Congressman Don Colton, and Mr. Kneipp of the United States Forest Service.

¹⁷ S.B. 668, December 10, 1923. Smoot reintroduced the bill to create Utah National Park.

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With Senator Smoot's acquiescence and letters of approval from the Secretary of the Interior and the Secretary of Agriculture, President Warren G. Harding created Bryce Canyon National Monument by executive order on June 8, 1923. In his order, President Harding indicated that the lands within Bryce Canyon possessed not only "unusual scenic beauty," but the lands were also valuable for their "scientific interest and importance." Since the newly established monument was located within the boundaries of the Powell National Forest, the USFS was identified as the administrative agency. However, Harding's order stated that "the Bryce Canyon Monument shall be the dominant reservation and any use of the land which interferes with its preservation or protection as a national monument is hereby forbidden."¹⁸

From August 18 to August 24, 1923, Frank A. Waugh, Recreation Engineer for the USFS, visited the recently established Bryce Canyon National Monument. Although the monument was recognized as "a scenic and recreation area of national importance," Waugh lamented that the decision had come too late to prevent the Union Pacific Railroad from purchasing part of Section 36, T36S, R4W from the State of Utah. That section was situated in the most popular tourist area along the rim, and Ruby Syrett had located "Tourists' Rest" there. Waugh complained that the UP purchase placed the company "through its subsidiary organization [Utah Parks Company], in practical control of the administration of the whole National Monument."¹⁹

Waugh worried that since the Union Pacific owned or leased the heart of the monument, the USFS would play only a secondary role in its administration. He proposed that the USFS should move to ensure that the UP serve the public interest by establishing and enforcing firm, clear guidelines for the concessioner's activities. The proposal

¹⁸ Executive Order No. 1664, June 8, 1923. Bryce Canyon was located within the Powell National Forest. In 1922 national monuments were administered by the federal agency that managed the property upon which the monument was located. In 1933, through Executive Order 6166, administration of the national parks, national monuments, and several other federal parks and cemeteries consolidated under the National Park Service administration.

¹⁹ Frank A. Waugh, *Bryce Canyon National Monument and Cedar Breaks: Studies of Physical Development*, for Powell National Forest and Dixie National Forest, 1923, pp. 6-7, File: 51, National Monument Status, Waugh Reports, 1923-24, Drawer 2, Curatorial Files, Bryce Canyon National Park, Utah. Scratfish, *Historic Resource Study: Bryce Canyon National Park*, pp. 48-52. The Union Pacific had worked out a settlement with Ruby Syrett for Syrett's lodge and other improvements in Section 36. Syrett also assigned his water rights at Hopkins Springs and Shaker Springs to the Union Pacific. The Utah Parks Company leased the remainder of Section 36 from the State of Utah.

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Waugh outlined placed the care of all visitors in the hands of the Utah Parks Company (UPC), thereby granting the company "a practical monopoly of the business within the National Monument."²⁰

Since the Union Pacific Railroad controlled a strategic location, Waugh thought the USFS would have minimal responsibility for developing and maintaining tourist facilities. However, he prepared a site plan suggesting where the various facilities should be located, and he described the areas and structures to be administered by the USFS. These included the reservation of a public campground (located south of the UPC's Bryce Canyon Lodge), a platform and overlook at President Harding Point, a shelter near the overlook (about 200 feet away from the rim), two toilets near the shelter, simple benches at two points on the rim between the lodge and President Harding Point, a log portal at the north entrance to the monument, and improvements on the trails within the canyons below the plateau rim. Waugh recommended that the structures be built with yellow pine logs.²¹

Waugh based his design for public accommodations on his understanding of the people that would most likely utilize the park. He identified three classes of tourists. First, the comparatively affluent were brought by the railroad company and sought first-class accommodations. Second, the travelers of moderate means came by railway or private car and preferred more moderate means, such as cabins or tent cities. Third, automobile travelers who carried their own tents and camp equipment sought only clean and safe campgrounds. Waugh preferred that the railway company be responsible for all tourist facilities, but if they ignored the latter two groups, the USFS should provide the facilities or find another concessioner to manage them. In the case of Bryce Canyon, the USFS managed the public campground.

The USFS invested little in the early administration and development of Bryce Canyon National Monument except for suggesting the placement of the first facilities. The agency's major contribution was the construction of a road into the monument and a road to Bryce Point. The USFS also maintained an automobile campground as well as building and maintaining several miles of foot and horse trails.²²

From the beginning, Senator Smoot and other "park" promoters were dissatisfied with setting aside the area as a national monument. Rather, they believed the area to be worthy of national park status. Other proponents believed the monument was too small and that too much significant scenery was left unprotected. The Union Pacific's control of the central section of the monument was disturbing to those who feared the railroad would not always attend to the public interest.

²⁰ Waugh, *Bryce Canyon National Monument and Cedar Breaks*, pp. 14-15.

²¹ *Ibid.*, pp. 20-22.

²² *Ibid.*, pp. 9-13; Scratfish, *Historic Resource Study: Bryce Canyon National Park*, pp. 78-81.

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Within a year after President Harding issued his Executive Order creating the monument, Congress initiated steps to alter the status of Bryce Canyon from a national monument to a national park. On June 7, 1924, Congress approved legislation authorizing the establishment of Utah National Park. The change from monument to park could not take place immediately, however, for Congress added a proviso to the legislation requiring that "all the land within the exterior boundaries of the aforesaid tract shall first become the property of the United States."²³ This stipulation would necessitate the State of Utah and the Union Pacific Railroad to reconvey their interest in any lands within the park boundaries to the United States.

Railroad officials balked at relinquishing their property without a significant return. The United States could not establish a national park without title to the land. Meanwhile the UPC continued to build its facilities and the USFS administered the monument with a "light touch."

For three years the national park proponents sought a resolution of the land issue. Then in 1927 the Union Pacific proposed that it would deed its holdings (21.69 acres) to the United States provided the United States would expedite the completion of the Zion — Mt. Carmel Road. This would improve transportation to the North Rim of the Grand Canyon, where the Union Pacific was developing tourist facilities. The Union Pacific also agreed to the transfer of the balance of their lands at Bryce Canyon, which it leased from the State of Utah, to the United States.²⁴

During the summer of 1927 the United States, the State of Utah, and the Union Pacific Railroad reached an agreement that embodied the Union Pacific proposals, and on September 15, 1927, the Interior Department accepted all the alienated lands within the Bryce Canyon National Monument, thereby fulfilling the requirements of the 1924 legislation. Superintendent E. T. Scoyen of Zion National Park was designated as acting superintendent in charge.

Neither the 1924 legislation nor the NPS's annual appropriation contained monies for administration of the park. National Park Service (NPS) Director Stephen T. Mather therefore requested R. Y. Stuart, the USFS's Chief Forester, to temporarily maintain the same general supervision of the area that agency had provided in the past.²⁵

²³ Public Law 227, June 7, 1924, 43 Stat. 593.

²⁴ Eviend T. Scoyen, "An Interview about his Experiences as the First Superintendent of Zion National Park, 1927-1931," interviewed by Lucy C. Schiefer (Typescript, Springdale, Utah, January 28, 1971), pp. 7-9, File: Drawer 2, Curatorial Files, Bryce Canyon National Park, Utah; Scratfish, *Historic Resource Study: Bryce Canyon National Park*, pp. 95-99.

²⁵ Stephen T. Mather, Director, National Park Service, to R. Y. Stuart, Chief Forester, U.S. Forest Service, September 28, 1928, File: Legislation Re: Lands, Extension of Bryce Canyon Boundaries, Drawer 4, Curatorial Files, Bryce Canyon National Park, Utah.

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Although the 1924 legislation authorized the creation of Utah National Park, the name was unacceptable to most of the parties involved in promoting Bryce Canyon. Union Pacific officials adamantly opposed the proposed name, since they had already spent considerable money advertising "Bryce Canyon." On December 6, 1927, Senator Smoot introduced a bill to change the name to Bryce Canyon National Park. The Acting Secretary of the Interior approved the name change and also urged that lands at the north and south ends of park be added to extend park boundaries and include significant scenic areas.²⁶ On February 25, 1928, Congress authorized legislation changing the name from "Utah National Park" to "Bryce Canyon National Park."²⁷

When the NPS assumed responsibility for the park in 1928, the administration initiated steps to establish their authority and to enhance the park's status. By securing the lands previously held by the state and the railroad, the United States had gained possession of all the land within the park boundaries and ended the de facto administration that had been exercised by the UPC. In May, 1928, Congress passed the first of a series of bills that would enlarge the park dramatically and bring under park jurisdiction numerous scenic areas that had been excluded from the original park.²⁸

In his travels through the park area in 1929, Park Ranger Maurice Cope discovered several areas that he thought should be included within the park boundaries. He believed that the entire rim above Bryce Canyon should be included. He considered Water Canyon to be a "choice bit of scenery," and proposed a trail up Water Canyon to Mossy Cave, which in April and May, when the ice formation was at its best, was "a real gem."²⁹

During the following year, Ranger Cope, local USFS officials, and Superintendent Scoyen examined the entire area. They concluded that there were extensive areas of land that should be included within the park. In a

²⁶ F. C. Finney, Acting Secretary, to Gerald P. Nye, Chairman of Committee on Public Lands and Surveys, December 29, 1927; "Changing the Name of the Utah National Park to the Bryce Canyon National Park," *Senate Report* 48, 70th Cong., 1st sess., 1928, Serial 8829.

²⁷ Public Law 74, February 25, 1928.

²⁸ Public Law 374, May 12, 1928, 45 Stat. 502. Bryce Canyon National Monument contained approximately 7,440 acres when it was established in 1923. In 1931 Bryce National Park contained a total of 35,248 acres. Thomas J. Allen Jr., Superintendent, to Director, National Park Service, July 8, 1931, File: Legislation Regarding Lands, Extension of Bryce Canyon Boundaries, Drawer 4, Curatorial Files, Bryce Canyon National Park, Utah.

²⁹ Maurice Cope to Donald Jolley, Chief Ranger, Zion National Park, October 17, 1929, File: Reports to Superintendent, 1929, Archives, Zion National Park, Utah. For a detailed account of the legislation leading to the enlargement of the park, see Scratish, *Historic Resource Study: Bryce Canyon National Park*, pp. 100-106.

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memorandum Scoyen described the areas he thought should be included. "From the [Natural] Bridge to the climax on the knob just east of Podunk Point is a region of magnificent scenic quality in many respects superior to Bryce Canyon whose wonders brought about the creation of the park." He believed that the knob at Podunk [Rainbow] Point was destined to become "one of the worlds [sic] famous observation points."³⁰

Congress had authorized the President on June 13, 1930, to add certain lands to the park upon joint recommendation by the Secretary of Agriculture and the Secretary of the Interior.³¹ The act, however, did not cover lands in the area north of the Lodge area, for no recommendation could be made until the area was surveyed to determine the location of roads and trails.³²

Superintendent Scoyen did not consider the northern rim areas "very important from the scenic standpoint," but he thought that their inclusion in the park would prevent "outside interests" from starting operations that they could advertise as "located on the rim of Bryce Canyon."³³

³⁰ E. T. Scoyen, Superintendent, *Memorandum Regarding Lands to be Added to Bryce Canyon Park*, December 3, 1930, File: Legislation Regarding Lands, Extension of Bryce Canyon Boundaries, Drawer 4, Curatorial Files, Bryce Canyon National Park, Utah.

³¹ Public Law 352, June 13, 1930, 46 Stat. 582.

³² E. T. Scoyen, Superintendent, *Memorandum Regarding Lands to be Added to Bryce Canyon Park*, December 3, 1930, File: Legislation Regarding Lands, Extension of Bryce Canyon Boundaries, Drawer 4, Curatorial Files, Bryce Canyon National Park, Utah. Scoyen anticipated the addition of 21,680 acres under the terms of the 1930 act and the legislation that he was proposing.

³³ E. T. Scoyen, Superintendent, to Director, National Park Service, December 9, 1930, File: Legislation Re: Lands, Extension of Bryce Canyon Boundaries, Drawer 4, Curatorial Files, Bryce Canyon National Park, Utah; "Adjusting Boundaries and Addition of Certain Lands to the Bryce Canyon National Park, Utah," *Senate Report* 1401, 71st Cong., 3d sess., 1931, Serial 9323. An error was made in the description of the land to be included in the park in the Act of February 17, 1931, 46 Stat. 1166-1167. The error resulted in an irregular boundary line that isolated certain sections of the park. In 1941-42 the problems created by the error were addressed in new legislation (56 Stat. 141, March 7, 1942).

From a scenic standpoint, the lands in question are vital to the national park. They contain portions of the rim of the canyon, large sections of the famous Pink Cliff formation, and many highly colored and fantastically carved erosional forms. They also contain scientifically valuable fossil deposits. The preservation of the canyon rim and the weirdly sculptured pinnacles found immediately below the rim was, of course, the primary purpose in giving the Bryce Canyon area national park status. (Harold L. Ickes, Secretary of Interior, to J. W. Robinson, Chairman, House Committee on Public Lands, May 22, 1941, File: Legislation Re: Lands, Extension of Bryce Canyon Boundaries, Drawer 4, Curatorial Files, Bryce Canyon National Park, Utah).

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On February 17, 1931, Congress authorized the President to add the proposed lands to BRCA, and on May 4, 1931, President Herbert Clark Hoover issued an executive order extending the boundaries of the park.³⁴ The inclusion of these areas brought the entire rim within the park boundaries and secured the principal scenic viewpoints.

Establishment of the Union Pacific Railroad Co. and its Subsidiary as the Primary Concessioner

There was money to be made at Bryce Canyon. At least Forester J. W. Humphrey thought so after viewing the area in 1915. While he apparently made no personal financial investment in area development, he enthusiastically publicized Bryce Canyon and attempted to interest the Denver & Rio Grande and Union Pacific railroads in providing transportation and constructing hotel and other tourist accommodations.³⁵

Humphrey's appeal to the railroads made sense, for during the previous decades major railroads had been the principal developers of tourist facilities at several national parks. Since most of the parks were located in isolated, undeveloped regions, only the railroads could secure sufficient capital to build hotels and establish transportation to the parks. At Glacier National Park, the Great Northern Railway was instrumental in developing park facilities, while the Northern Pacific Railroad built the accommodations at Yellowstone National Park.³⁶

In determining the economic feasibility of an investment in Bryce Canyon, railroad officers focused on three principal issues. First, they had to be assured that Bryce Canyon would be a park of superior quality that could attract large numbers of affluent tourists. The scientific and aesthetic resources at Bryce appeared to meet that requirement. In addition, its proximity to the North Rim of the Grand Canyon and Zion National Park made it part of a potential tourist loop in southern Utah and northern Arizona.

Second, since passenger service alone could not justify the cost of railroad construction through southwest Utah, railroad officials had to consider the future of agriculture and mining in the region to try to determine if there would be an increased demand for freight service. Third, the officials had to determine if federal and state officials were

³⁴ Executive Order, May 4, 1931.

³⁵ Humphrey, "Early Development of Bryce Canyon." Humphrey did guide groups, which he called "show me" tours, to Bryce Canyon. There were at times 200 to 300 persons in the groups. Humphrey did not say if he charged for this service or not, but he did recognize the potential of tourism for making money.

³⁶ Horace M. Albright and Frank J. Taylor, *Oh, Ranger!* (New York: Dodd, Mead & Co., 1936), pp. 193-194.

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willing to invest in the construction of improved roads to reach the park areas in southern Utah and inclined to negotiate favorable terms through which the railroad would provide service.

Although the Denver & Rio Grande had built a line as far as Marysvale, Utah, and had plans for extending the line south to Flagstaff, Arizona, financial difficulties discouraged the railroad from establishing a Bryce Canyon connection. The Union Pacific officers, on the other hand, concluded that the development of the tourist attractions in southern Utah and the establishment of a regional rail connection with Cedar City as the center promised a profitable return.³⁷

The geological connection between the Grand Canyon, Zion Canyon, Bryce Canyon, and Cedar Breaks was well known.³⁸ Considered together, each represented a different period from millions of years of geologic change. Union Pacific officers could see that these areas of scientific and aesthetic interest could also be connected as a tourist loop. Bryce Canyon was the major beneficiary of this concept. Small, isolated, and inaccessible for a large part of the year, it was practical to invest in tourist facilities only in conjunction with the development of the other adjacent areas.

By 1922 the Union Pacific officers were convinced that the Denver & Rio Grande was not going to lay additional track south of Marysvale. They also believed that there was sufficient freight traffic to warrant Union Pacific construction to Cedar City. Cedar City officials appeared willing to assist in the construction of a rail center, and the state and federal agencies had voiced support for the company's development program. Although they left much to be desired, passable roads had been built to Zion, the North Rim of the Grand Canyon, Bryce Canyon, and Cedar Breaks.³⁹

While the Union Pacific was assessing the potential for Bryce Canyon development, Utah promotional interests promoted the canyon and the number of visitors increased. When the Union Pacific decided to develop Bryce Canyon, the company was faced with the fact that the state of Utah owned the prime location for tourist facilities, and that Ruby

³⁷ Scrattish, *Historic Resource Study: Bryce Canyon National Park*, pp. 32-40.

³⁸ Although Cedar Breaks was not established as a national monument until 1933, the Union Pacific officials recognized that it was an area of great geologic interest and beauty and included it in the railroad's plans for a tourist loop.

³⁹ National Park Service, *Zion and Bryce Canyon National Parks, Utah* (Washington: National Park Service, 1939), pp. 28-29. The Mukuntuweap National Monument was created by executive order on July 31, 1909. Mukuntuweap was the name the local Indians gave the Virgin River. Later, Congress changed the name of the monument to 'Zion,' the name the Mormons had given to the canyon. Cedar Breaks National Monument was created by presidential proclamation on August 22, 1933.

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Syrett had already built a lodge and cabins there.⁴⁰ The railroad hoped to purchase part of the land and lease the remainder from the state. After considerable negotiations, some of which were not cordial, the state agreed to sell a portion of the land to the UP and to negotiate a lease for the remainder of Section 36 with the railroad. The railroad then negotiated an amicable settlement with Syrett to purchase his improvements.

With title to the prime Bryce Canyon property firmly in hand, the Union Pacific had only one major obstacle to overcome.⁴¹ Under pressure from NPS Director, Stephen Mather, the UP organized a subsidiary, the Utah Parks Company (UPC), to operate the transportation, lodges, and concessions at the southern Utah parks. The creation of the UPC also limited legal responsibility for the Union Pacific. Articles of Incorporation for the UPC were drafted on March 26, 1923.⁴²

Gilbert Stanley Underwood and the Utah Parks Company

In the spring of 1923 — once the UP had decided to invest in Zion, Bryce Canyon, and Cedar Breaks — the company's officers selected Gilbert Stanley Underwood, a Los Angeles architect, to design the buildings for the three locations.⁴³ At Bryce Canyon, Underwood first selected the site for the central lodge. The officers justified the extra expense of a lodge by its potential for luring the convention trade. They believed that construction of simple cabins alone would not attract such a class of tourists.

Underwood selected a site close to, but removed from, the edge of the plateau. Construction of the lodge at this location prevented the building from interfering with the view from the rim, yet lodge guests had only to walk a short

⁴⁰ "Biography of Reuben Carlson Syrett (Ruby) & Clara Armenda (Minnie) Excell Syrett," (Typescript, 1962), File: BRCA History File, Library, Bryce Canyon National Park, Utah.

⁴¹ Scratish, *Historic Resource Study: Bryce Canyon National Park*, pp. 48-50.

⁴² *Ibid.*, pp. 43-44.

⁴³ Underwood designed several large hotels for various park concessioners. In addition to the buildings constructed in the UPC's southern Utah parks, Underwood designed the Ahwahnee Hotel in Yosemite National Park, the Old Faithful Lodge in Yellowstone National Park, and the two primary buildings (the market and the Eddy Linley studio) in the Giant Forest Village in Sequoia National Park.

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distance to view the scenic "hoodoos."⁴⁴ Additional buildings were then located in relation to the lodge. He designed the buildings in what has come to be known as "rustic" style. Since building materials for the lodge and cabins were acquired locally, their character was to some extent predetermined. Stone was quarried a short distance from the site, and logs were cut from the national forest. The UPC contracted with Ruby Syrett and Owen Orton for the lumber.⁴⁵ Local stonemasons and carpenters were used for construction.

The Bryce Canyon Lodge — consisting of an office, lobby, dining room, kitchen, showers and toilets — was finished by May, 1925. The second floor housed sleeping quarters for overnight guests or possibly for employees.⁴⁶ Between 1924 and 1929 Underwood designed modifications and additions that included a rock facade for the original portion of the building, wings with rooms to accommodate additional guests, a curio store, and a recreation hall.⁴⁷ He also designed the 67 standard and economy cabins, grouped around the lodge, and fifteen deluxe cabins, each with a bathroom and fireplace.

Like other architects working within the national parks, Underwood based his designs upon the use of native materials, with several unique applications. For the Bryce Canyon Lodge and associated standard cabins and auxiliary buildings, he used an exposed, dimensional lumber framing system. Although Underwood used logs as structural components of many of the buildings in the lodge district, none of the buildings located there are notched-log buildings. This is best exemplified in the deluxe cabins, where half logs (some with the bark left on) are placed both vertically and horizontally as exterior siding. Large, whole logs are used as structural support members at major entries (such as the entry to Bryce Canyon Lodge), and peeled poles figure prominently in the roof truss systems (many of which are exposed on the interiors of buildings), and as railings and support members for the porches on smaller buildings. Heavily textured, native-stone foundations and fireplaces, as well as the use of wood shingles applied in a wavy pattern to steeply pitched, hip and clipped-gable roofs, contribute further to the rustic design of Underwood's BRCA buildings. These design elements characterized the buildings completed by 1928 (when the monument became a park), and are also found in later buildings designed by Underwood.

⁴⁴ Leslie Ullman, *Bryce Canyon Lodge and Cabins: Historic Structures Report* (Denver: National Park Service, 1985), p. 11. Ullman states that "The Lodge was intended to be temporary until a permanent structure could be erected at the very rim of Bryce Canyon."

⁴⁵ *Ibid.*, p. 42.

⁴⁶ Scratish, *Historic Resource Study: Bryce Canyon National Park*, p. 83.

⁴⁷ *Ibid.*, p. 83.

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The Establishment of a Transportation System within the Park and Expansion of UPC Facilities

The UPC planned their building complex at Bryce Canyon on the assumption that the company's touring cars and buses would carry most of the tourists who visited Bryce Canyon and the other parks on the loop. In the spring of 1925 the Utah Public Utilities Commission granted the UPC permission to operate touring cars. This amounted to a monopoly on the touring business.

The UP had adamantly refused to invest any money in highway improvements, but UP officials worked diligently behind the scenes to secure financial support from the USFS, the NPS, and the State of Utah to build and improve the roads on the southern Utah park circuit. The UP was very successful in convincing the other parties to assist in raising the necessary funds. The Zion/Mt. Carmel Tunnel proved to be the final vital link in the road system establishing the loop.⁴⁸

As the roads were improved in the late 1920s, the numbers of tourists driving their own automobiles to the park increased greatly. Many of them had their own tents and demanded increased camping facilities.⁴⁹ In 1932 the UPC asked Underwood to design a cafeteria/store and a separate comfort station for the "camp center," an area away from the lodge near the public (NPS) campground. Located north of the main lodge at Sunrise Point, the Bryce Inn formed the focal point of the camp center, catering to guests staying in the UPC's housekeeping cabins, campers using the NPS-operated campground and the day visitors to the park. In 1934 twelve standard cabins were moved away from the lodge to the camp center and remodeled into "housekeeping" cabins.⁵⁰ Underwood also designed eleven "housekeeping" units and in 1937, a laundry-room addition for the cafeteria within the camp center. These were the last of Underwood's buildings to be constructed at Bryce Canyon.⁵¹

⁴⁸ Scrattish, *Historic Resource Study: Bryce Canyon National Park*, p. 68.

⁴⁹ Maurice Cope, Park Ranger, to Donald J. Jolley, Chief Ranger, Zion National Park, Monthly Report, July 31, 1934, File: 207-02 Monthly Reports, 1934, Archives, Drawer 1, Zion National Park, Utah. The numbers of visitors to the park increased by 64.28 percent in 1934. The number staying at the auto camp had increased by 49.4 percent.

⁵⁰ Maurice Cope, Park Ranger, Monthly Report, June 30, 1934; July 31, 1934; D. J. Jolley, Chief Ranger, Zion National Park, Monthly Report, March 1934, File: 207-02 Monthly Reports to Superintendent, 1934, Archives, Drawer 1, Zion National Park, Utah.

⁵¹ Ullman, *Bryce Canyon Lodge and Cabins: Historic Structures Report*, pp. 39-40.

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Later improvements to BRCA commissioned by the UPC included a dormitory near Bryce Canyon Lodge, constructed in 1937/38 and, finally, a service station constructed in 1947. Although Underwood did not design these last two buildings, the NPS did review and approve plans for both buildings. It is obvious that attempts were made to give the dormitory a rustic feeling and to blend with the remainder of the lodge complex. However, the only acknowledgement of the rustic tradition exemplified in the service station is the use of rustic materials, most notably the stone in the massive rear wall. The design of the building reflects contemporary architectural themes.

Besides the 1947 construction of the service station, no substantial additions were made to concessioner's facilities in BRCA. Periodic updating of building components (e.g. the addition of bathrooms to the standard cabins in the 1940s), reflected the changing expectations of the "typical" park visitor. With the exception of the period of America's involvement in World War II (during which time the UPC closed all its southern Utah park operations), the UPC operated the lodge and the camp center yearly during the summer season. These facilities, the majority of which were constructed in the late 1920s and the early 1930s, provided the only lodging and dining services for visitors within the park boundaries.

In 1972 the UPC donated all of its Bryce Canyon facilities to the NPS, which in turn sought a new concessioner for the park. TW Services (a subsidiary of Trans World Airlines), has held the concession to the lodge and inn at BRCA since 1972. A major redevelopment project in the 1980s eliminated the majority of the standard and housekeeping cabins that date to the historical period, and the interior of the lodge has been remodeled. The cabins have been replaced by two massive modern motel units. Although the motel units have been designed to blend with the natural setting of the park in terms of the materials used in their construction, the character of the old concessions complex has been dramatically altered.

Development of National Park Service (NPS) Administrative Infrastructure

While Bryce Canyon remained a national monument, the UPC dominated facility development activities. The USFS kept a very low profile, and the company retained an almost free hand in area administration. When the national park was created and enlarged, the UPC complex became less dominant. The park extended far beyond the boundary of the original monument, and the NPS aggressively asserted administrative authority over the entire park.

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Buildings and Structures Completed During Rapid Construction Period (1929-1933)

Immediately after assuming jurisdiction over Bryce Canyon, the NPS prepared plans for the development of park facilities. The NPS's Chief Landscape Architect Thomas Vint, and his assistant Harry Langley, of the NPS Branch of Plans and Design in San Francisco, supervised the design and construction of these initial facilities.⁵² Funding for construction at Bryce Canyon was not extravagant. Yet, the initial appropriations allowed the NPS to construct buildings for the storage of equipment and supplies, the protection and shelter of livestock, and the comfortable housing and maintenance of a resident staff during the tourist and work season. The following buildings and structures were built between 1929 and 1933: two comfort stations, a checking station, and custodian's residence (1929); warehouse and horse barn (1930); dormitory, messhouse, employees' quarters, and office (1931-32). The appropriations also allowed the staff to maintain a public campground and to begin building comfort stations, drinking fountains, and other tourist facilities away from the UPC lodge and cabin area.⁵³

The NPS administrative buildings were located in an area removed from the scenic overlooks at the rim (but in relatively close proximity to the lodge and cafeterias) so that their presence would not interfere with the aesthetic or scientific values of the park. Workers constructed the buildings using native stone, logs, and finished lumber. Superintendent Scoyen thought the dormitory and mess hall presented "an extremely attractive appearance and are so designed that their usefulness is unlimited." The dormitory contained a central recreation room with a large fireplace, as well as the employee living quarters.⁵⁴

The onset of the Great Depression in the early 1930s seriously impacted congressional funding for NPS construction projects, including work at Bryce Canyon. As a result, the NPS found their construction program at the park severely curtailed.

⁵² E. T. Scoyen, Supt., Monthly Report, August 12, 1929, File: Monthly Reports, 1929, Archives, Zion National Park, Utah.

⁵³ Monthly Reports to the Superintendent, Zion National Park, 1929, 1930, 1931, 1932, File: Archives, Zion National Park, Utah; Scratish, *Historic Resource Study: Bryce Canyon National Park*, pp. 144-145.

⁵⁴ Zion Superintendent, Monthly Report, October 6, 1931, File: Monthly Reports to the Superintendent, 1931, Zion National Park, Utah; Maurice Cope, Park Ranger, to Donald Jolley, Chief Ranger, November 30, 1931, File: Reports to Superintendent, 1931, Archives, Zion National Park, Utah.

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Trails and Roads Constructed to Provide Public Access to Natural Scenic Views

As NPS personnel worked to complete the basic administrative buildings, they also planned and began construction of trails and roads to provide access to the park's scenic wonders. The first trails built specifically for visitor use likely date to about 1917 and were constructed as a result of the special appropriation secured by Forest Supervisor J.W. Humphrey to provide access into the area below the plateau rim. A sketch map accompanying the 1924 Waugh Report, shows two existing trails labeled as the "Piute Trail" and "Navajo Trail" in the vicinity of the current Navajo Loop Trail. NPS standards for trail construction were well established by as early as 1915⁵⁵, however the extent to which the USFS (the administrator of Bryce Canyon in 1917) adhered to these own standards is unknown. It is more likely that these first trails were constructed according to USFS trail construction guidelines, which were established early in that agency's development. In any event, when the NPS assumed administrative control of Bryce Canyon, it inherited a few previously constructed trails.

Bryce Canyon National Park afforded visitors two distinct aesthetic experiences. On the one hand, a journey below the rim brought one into intimate association with the "hoodoos," the marvelous geologic masterpieces for which Bryce Canyon is most famous.⁵⁶ On the other hand, located along the rim of the Pink Cliffs, were "Inspiration," "Bryce," and "Rainbow" points where visitors could view the seemingly endless, multicolored geologic figures in the eroded basins below the edge of the plateau. These viewpoints also allowed visitors to revel in the vast panorama of the southern Utah plateaus. The challenge to the NPS was to plan and construct trails and roads that would provide access to Bryce Canyon's wonders without defacing them.

Between 1929 and 1932, the NPS invested monies in the construction of trails and roads to augment those constructed by the USFS. Work on a new horseback trail into Bryce Canyon and the foot trail under the rim was begun in July and August of 1929. In their initial plans for development of foot trails under the rim, park officials had anticipated building three trails into the canyon. Yet, they were unable to determine how to bring these trails out onto the rim without defacing the landscape. NPS engineers and landscape architects solved their dilemma by building three stairways over the rim.⁵⁷

⁵⁵ Linda Flint McClelland, *Presenting Nature: The Historic Landscape Design of the National Park Service 1916 to 1942*. (Washington: National Park Service, 1993, p.77).

⁵⁶ Jack Roof, "Bryce Canyon Trails," *Western Gateways* 9 (March 1969), pp. 13-14.

⁵⁷ Superintendent, Zion National Park, *Monthly Report*, August 18, 1929, File: [Superintendent's] Monthly Report [to Director], 1929, Archives, Zion National Park, Utah.

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Park Ranger Maurice Cope was very pleased with the results. Many people told him that "the trip down the new foot trail was the best trip they had ever taken," and Cope thought that "the Queen's Garden trail now makes the Queen's Garden a real wonderland."⁵⁸ A year later Superintendent E. T. Scoyen praised the new trail in his report to the Director.

In the first place it was never built to go to some objective. Entering the canyon it wanders around in the bowl for about 5 miles and then comes back. Its location was determined from two viewpoints. First, it must reach the most interesting places in the canyon and second must keep out of the foreground or background of the best views. Shortening distance between points was not a construction objective as the trail was not being built "to go somewhere." I think that the results which have been achieved in this manner have been amazing, and I feel quite certain that anyone will feel that this is one of the most interesting five mile horseback trips to be found anywhere. In order to keep from making scars crossing the great reefs in the canyon on which the pinnacles stand we made tunnels through these narrow ridges.⁵⁹

In 1931 Park Ranger Cope reported the planning or completion of a variety of new trails within Bryce Canyon. Park personnel prepared plans for Fairyland Trail and a trail system in Campbell Canyon. They also began work on a trail from the horse mounting area to Sunrise Point that would keep "the parties from traveling thru [sic] the campground and has a tendency to keep the party traveling in better order." Finally, they began work on a new trail from Peek-a-Boo Canyon up to Bryce Point that Cope believed would be a "knockout."⁶⁰ The trail work was continued in 1932, but the reduction of funds and personnel caused delays in completion of some projects.

With regards to park roads, NPS officials believed that there should be a limited number within the park. While Bryce Canyon remained a national monument, tourist activities had been concentrated in the UPC lodge area. A road from the lodge to Bryce Point was the only one deemed necessary for providing access to the monument's viewpoints. However, with the establishment of the national park and the expansion south to Rainbow Point in the early thirties,

⁵⁸ Maurice Cope to Donald Jolley, Chief Ranger, Zion National Park, October 17, 1929, File: Reports to Superintendent, 1929, Archives, Zion National Park, Utah.

⁵⁹ E. T. Scoyen, Supt., Monthly Report, December 17, 1930, File: Monthly Reports, 1930, Archives, Zion National Park, Utah.

⁶⁰ Maurice Cope, to Donald Jolley, Chief Ranger, November 1, 1931; July 3, 1931; November 30, 1931; Thomas C. Parker, Associate Engineer, "Engineering and Construction Report for Zion and Bryce Canyon National Parks, August, 1931," File: Reports to Superintendent, 1931, Archives, Zion National Park, Utah.

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the NPS planned a road that would extend the length of the park and provide access to the several view points located along the canyon rim.⁶¹ This road, which provided automobile access to Farview, Natural Bridge, and Rainbow Point, was built between 1931 and 1935.⁶²

Construction of the rim road posed a number of engineering problems. The greatest difficulty entailed connecting the UPC lodge to the road without interfering with the aesthetics of the natural landscape.⁶³ This was accomplished by moving the road some distance west of the lodge complex. The decision reflected the fundamental goal of keeping the road away from the edge of the plateau and the scenic overlooks. The officials responsible for mapping the road's course planned to access scenic vistas, but they believed that travelers should not be able to view those vistas from their autos. Their plans also included the construction of a spur road to Inspiration and Bryce Points.

"New Deal" Programs and Their Influence on Park Facilities — 1933 to 1942

By 1933 the flurry of construction activity by the NPS at Bryce Canyon slowed down considerably. NPS personnel had been reduced in 1932, and funding of new projects was seriously curtailed. In April and May, Ranger Cope and what was left of his small staff completed the finish work for the interior of the administration building. Cope kept his small crew busy cleaning up the auto camp, maintaining trails, and building short spur roads within the administration area.⁶⁴ Work continued on the contracts for building the Rim Road, yet, it appeared that additional projects would have to be delayed until the nation recovered from economic depression. However, when Franklin Roosevelt was inaugurated as 32nd President, he initiated a variety of public relief bills designed to provide jobs for the millions of unemployed Americans and to spur economic recovery. President Roosevelt's economic plan improved the outlook for completion of park projects.

⁶¹ Scratish, *Historic Resource Study: Bryce Canyon National Park*, pp. 138-142. Scratish summarizes the construction contracts for the Rim Road on page 142.

⁶² Scratish refers to this roadway as the rim road in his 1984 report. It is listed as the rim road in the National Register Determination of Eligibility dated prepared by NPS Historian Berle Clemenson.

⁶³ Superintendent Zion, Monthly Report, August 6, 1931, File: Superintendent's Monthly Reports, 1931, Archives, Zion National Park, Utah.

⁶⁴ Maurice Cope, Park Ranger, to Donald Jolley, Monthly Report, January 31; April 30; May 31; June 30; July; August; September 30; October 31, November 30; December 31, 1931, File: 207-02 Monthly Report to Superintendent, 1933, Archives, Zion National Park, Utah.

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Roosevelt's "New Deal" programs proved to be especially beneficial to the national parks. In the 1920s the NPS had begun preparing long-range development plans for each of the parks. When Congress enacted relief and conservation programs, the NPS was ready to implement these plans and officials responded immediately. Through executive reorganization and massive federal funding for unemployment relief and conservation programs, the NPS consolidated its administration of federal parks and monuments and received an infusion of personnel and funds to accomplish long-term development projects. As a result, the NPS was able to complete a variety of park development projects fifteen to twenty years ahead of schedule.⁶⁵

Between April, 1933, and July, 1942, funds and personnel provided through the Civilian Conservation Corps (CCC), the National Industrial Recovery Act (NIRA), and the Federal Emergency Relief Act (FERA) contributed immensely to both maintaining and improving the administrative facilities as well as the public access system at BRCA. By October, 1933, Emergency Relief Administration (ERA)⁶⁶ and CCC crews began work in the park. That fall, they started construction of an equipment shed, completed parking lot improvements, and did trail maintenance.⁶⁷ The projects included the construction of a housing complex for seasonal employees (in the vicinity of the previously constructed ranger's residence and ranger dormitory), several log "comfort stations" (restrooms for park tourists), an administration building, fences, fireplaces and a lecture circle for the NPS campground, additional foot trails, and horse trails.⁶⁸

The NIRA and its associated agency, the Public Works Administration (PWA), proved to be advantageous to the NPS. In a report written in 1935 the author stated, "ever since the establishment of the Public Works Administration the NPS of the Department of the Interior has found itself enjoying some of the thrills of Aladdin." The program had made men and material available and brought about "the magical materialization almost over night of

⁶⁵ Harlan Unrau and G. Frank Williss, *Administrative History: Expansion of the National Park Service in the 1930s*, on file at Bryce Canyon National Park Library, Bryce Canyon National Park, Utah, p. 75.

⁶⁶ Enactment of FERA authorized the creation of the Emergency Relief Administration.

⁶⁷ Report of A. E. Cowell, Park Engineer on Public Works Projects, Zion and Bryce Canyon National Parks, for month of October, 1933, File: 207-02 Monthly Report to Superintendent, 1933, Archives, Zion National Park, Utah.

⁶⁸ For a complete list of all the CCC and ERA projects in Bryce Canyon see Scattish, *Historic Resource Study: Bryce Canyon National Park*, Appendix A, pp. 201-205. This list does not, however, include all the projects completed under the PWA and the WPA.

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important recreational and educational objectives long projected."⁶⁹ For the first time the NPS had sufficient money and personnel to develop both recreational and management facilities within the national park system.

Park managers carried out the various New Deal projects at Bryce Canyon within the parameters of NPS objectives, plans, and restrictions. Buildings constructed during this period conform generally to the then-well-developed concept of rustic architecture. The combination Rainbow Point overlook shelter (described in architectural drawings as a museum/overlook) is a good example of rustic style in its use of native log and stone. Similarly, the employee housing complex combined the use of the more functional and less expensive frame construction with rustic finishes that complimented the natural setting and the existing built environment.

With the use of CCC labor, BRCA officials also completed the final few segments of the Rim Trail, and one leg of the Fairyland Loop Trail, thus completing the system of paths connecting the entire rim (between Fairyland Point and Bryce Point) with the trails that meandered through the canyons below the rim. In addition to the scenic trails, CCC crews completed the Under-the-Rim Trail and the Riggs Spring Loop Trail. Both of these were classified as administrative trails, designed to access backcountry areas of the park for fire control and other administrative functions. At the same time, the park took advantage of the added manpower to improve previously existing trails, including such tasks as widening the tread to the then-standard width of four feet.

NPS Regulation of Private Stock Raising within the Park

Although the residents of the area surrounding BRCA generally supported the establishment of the park, there were those who viewed the enlargement of park boundaries as a threat to their livelihood. Stock raisers had used the Paunsaugunt Plateau and the canyon bottoms below its rim as grazing lands for sheep, cattle, and horses since the 1860s. When the government withdrew the area for inclusion in the national forest system, many stock raisers acquired grazing permits on the forest land.

In order to protect the ranchers' interests, the NPS attempted to exclude valued grazing land from inclusion within the park when congress authorized boundary extensions between 1928 and 1931. The NPS and USFS also agreed to grant grazing permittees a reasonable time to locate alternative range land before requiring them to move livestock from park land. The NPS's ultimate goal, however, was to remove all livestock from the park.

⁶⁹ "Statement Regarding PWA Activities in the National Park and Monument System," June 4, 1935, CCF, 1907-49, 618, Public Works Administration, Record Group [RG] 79, National Archives [NA]. Quoted in Unrau and Williss, *Administrative History: Expansion of the National Park Service in the 1930s*, p. 97.

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Through cooperation with the Forest Service, the NPS slowly accomplished this goal. By 1935 grazing had been eliminated from the northern area. By 1946 all sheep grazing in the park was ended. Not until 1964, however did permit grazing at BRCA finally end.⁷⁰

Termination of permit grazing did not eliminate all use of the park for livestock. The Act of February 17, 1931, and the Presidential Proclamation of May 4, 1931, provided that "nothing herein shall affect any valid existing claims upon the lands herein authorized to be added to the park or the rights of stockmen to continue to drive stock over the lands now under an existing stock driveway withdrawal."⁷¹ The stock driving issue continued to plague the park administrators. In 1932 Park Rangers Maurice Cope and Don Jolley tried to convince Tropic ranchers to drive their stock through the park on a different route to keep them away from the trails, the UPC lodge area, and auto camp. The previous year they had driven stock over a new park trail through Campbell Canyon, and the stock ended up in the lodge area until driven away by rangers. In order to control the stock, the ranchers agreed to limit the number of cattle being driven through the park to 12 at a time.⁷² A few of the stock driveways remain in use today, however, most are located in the northeast corner of the park — an area that does not receive heavy tourist traffic.

Context 2: The Influence of Landscape Architecture on NPS Facilities and the Development of Rustic Building Design

The influence of the principles of landscape architecture on the development of park improvements began at the same time as the establishment of the NPS. During the 1916 meeting of the American Society of Landscape Architects, participants discussed four areas in which the application of the principals of landscape architecture would be of benefit to the fledgling NPS. They would be critical to identifying appropriate boundaries for parks; in developing comprehensive general plans for park facilities; for approving designs for buildings and special structures; and, for developing maintenance systems that preserved park landscapes.⁷³

⁷⁰ Scratish, *Historic Resource Study: Bryce Canyon National Park*, pp. 107-111.

⁷¹ Executive Order No. 5525, January 5, 1931; Public Law 675, February 17, 1931; Executive Proclamation, May 4, 1931.

⁷² Donald Jolley, Chief Ranger, to Superintendent, Zion, February 1, 1932, file: 207-02 Monthly Report to Superintendent, 1932, Archives, Drawer 1, Zion National Park, Utah.

⁷³ William C. Tweed, Laura E. Soullière and Henry G. Law, *National Park Service Rustic Architecture: 1916-1942*, National Park Service Western Regional Office, Division of Cultural Resource Management, 1977, p. 21.

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In 1919 the director of the NPS hired formally trained landscape architect Charles Punchard to head the Landscape Division (later named the Branch of Plans and Design). For the remainder of the historic period, the division's directors and staff would be directly responsible for developing plans, or for approving plans developed by concessioners. This oversight ensured that improvements harmonized with a park's natural and cultural values. In some parks, concessioner development preceded by years the establishment of the Landscape Division, therefore the task of creating a unified, integrated appearance between old and new infrastructure and natural settings represented a formidable challenge.⁷⁴

By the late 1920s, park superintendents, with the assistance of Landscape Division staff, had begun preparing development plans for parks. These "master plans" (as they came to be known in 1932) were used to justify and apply for appropriations, and covered a variety of topics including the development of roadways, trails, campgrounds, administrative and concessioner buildings, and water and waste disposal systems. The master plans incorporated large maps illustrating the existing and proposed development areas, and provided text with specifications and the rationale behind the development schemes.⁷⁵

Preliminary field work for the preparation of the maps and text was conducted by NPS landscape architects during the summer, and incorporated into master plans for various parks during the winter months. Both landscape architects and architects worked together within the Landscape Division, the former contributing their knowledge and sensitivity of specific park environments and the latter their understanding of structural systems and building design.⁷⁶

One of the results of the establishment of the Landscape Division was the evolution and formalization of the concept of rustic architecture as it should be applied to NPS improvements. Trends in park architecture had already been established in some of the national parks by concessioners' architects. However, these earliest improvements did not necessarily conform to the standards of rustic design as they evolved and became incorporated into formal NPS policy.

As NPS funding increased during the 1920s and early 1930s, so too did the number of employees in the Landscape Division. In 1928, Chief Landscape Architect, Thomas C. Vint, hired a number of assistants, who, after one year of training, were assigned to specific western parks. Working in the parks during the summer season, these

⁷⁴ Linda Flint McClelland, *The Historic Landscape Architecture of the National Parks*, paper presented at Yosemite Centennial Symposium Proceedings, Natural Areas and Yosemite: Prospects for the Future, October 13-20, 1990.

⁷⁵ Ibid.

⁷⁶ Tweed, et al., *National Park Service Rustic Architecture: 1916-1942*, p. 51.

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landscape architects acted as consultants to the parks, developed and reviewed all construction plans, and furthered the NPS philosophy regarding the manner in which the natural environment should be modified to accommodate both park visitors and staff.

Slightly later, funding sources associated with relief projects facilitated more rapid development of NPS infrastructure. In 1933, the NPS submitted portions of the master plans to the PWA when that agency solicited potential projects. During that year, the administration approved a total of 164 building projects among western parks and monuments.⁷⁷

The large number of Landscape Division employees, coupled with an increase in building appropriations through WPA and later CCC programs, created a training crisis. Landscape Division employees had to be integrated into NPS philosophy regarding appropriate facilities development. This need was addressed in part by the 1935 publication of a manual (updated in 1938) that presented improvement designs and specifications appropriate for parks in different areas of the country. The purpose of the manual, and the contemporary attitude of the NPS towards development within parks, is stated in the "apologia" of the 1935 edition:

The intent in publication of this collection will be misconstrued if it is interpreted as providing source material for park structures, denying need for competent professional assistance in the creation of park buildings that may follow. The intent is the very opposite. The most completely satisfying subjects included herein are so, not as a result of chance, but because training, imagination, effort and skill are conjoined to create and fashion a pleasing structure or facility appropriate to a particular setting....If an existing structure is so admired that it persuades duplication, careful analysis will inevitably demonstrate that admiration springs from a nice perfection of the subject within one circumstantial pattern. As that pattern changes so must the structure change. To venture in translation without benefit of technical idiom foredooms to mediocrity if not to failure.⁷⁸

The manual also provides a most useful descriptive definition of "rustic" design:

Successfully handled, [rustic architecture] is a style which, through the use of native materials in proper scale, and through the avoidance of rigid, straight lines, and over-sophistication, gives the feeling of having

⁷⁷ Ibid., pp. 76-77.

⁷⁸ United States Department of the Interior, National Park Service, Branch of Planning, *Park Structures and Facilities*, Albert H. Good, editor, 1935, p. 8.

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been executed by pioneer craftsmen with limited hand tools. It thus achieves sympathy with natural surroundings and with the past.⁷⁹

Examples of a wide range of improvements, including retaining walls on trails, road culverts, entry signs, and administrative and concessioner buildings, are provided in this publication. All of the examples emphasize the use of native materials to create structures and buildings that harmonize with the specific park environment.

Regardless of the intent as implied in the manuals of 1935 and 1938, the continued construction of NPS improvements in rustic style was a relatively short-lived phenomenon. As federal relief funding decreased during the late 1930s and early 1940s, so too did the emphasis on "exaggerated" rustic design.⁸⁰ One of the concerns for NPS management was that log buildings were difficult to maintain and replacement components difficult to obtain. Tweed, *et al.*, point out that during the later 1930s, many NPS residences and utility buildings (which were never intended for public access), "made only minor concessions to their immediate settings.... Quite often, these were rather unexceptional wood frame houses incorporating rustic siding and stone veneer foundations." The NPS residences in the Old NPS Housing Historic District conform to this simplified rustic style.

Exceptions to the developing trend in a simplified architectural style continued to be made for buildings meant for public use. The design of these types of buildings in many instances continued to incorporate exaggerated rustic design elements including the use of oversized log and stone in construction. An excellent example of this is the overlook shelter and "museum" located at Rainbow Point. The design for this building originated in the Office of Plans and Design, San Francisco. Constructed in the early 1940s by CCC personnel, it represents the continuance of the NPS exaggerated rustic design.

The Landscape Division exerted an equally strong influence in the development of the BRCA trails system. In his monthly report for July of 1931, Associate Engineer Thomas C. Parker indicated that he had spent "...the entire month of July ... at Zion and Bryce Parks, in the capacity of Park Engineer and Assistant Superintendent." Parker indicated that the trail construction in Bryce Canyon was progressing well under the supervision of "a foreman and 10 men...." using a compressor and jack hammer. Furthermore, NPS landscape architect Harry Langley had inspected,

⁷⁹ *Ibid.*, pp. 3-4.

⁸⁰ Tweed, *et al.*, *National Park Service Rustic Architecture: 1916-1942*, p. 96.

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studied, and approved all survey and construction projects, including the trails work.⁸¹ Nineteen thirty-one (1931) was Langley's third summer season in the park, having first been assigned to Zion, Bryce Canyon and the Grand Canyon in June of 1929.⁸²

NPS Historian Linda McClelland describes the roles of engineers and landscape architects with respect to trails layout and construction as follows:

Both civil engineers and landscape architects were involved in the development of trails. ... As in road design, the landscape architects helped to locate the trails, capturing scenic features and views and protecting significant vegetation, rockwork and other natural features. The civil engineers were responsible for the construction of trails, which was often undertaken by staff within each park rather than outside contractors. The engineers were concerned with the gradient of the trails, attempting to maintain a varied grade not exceeding eight percent and to use switchbacks only where a gradual curving uphill trail was impossible. The engineers also addressed practical issues like constructing a solid base for a flat, even path free of rocks, tree stumps, and roots. The landscape architects, however, viewed the problems of trail building from the perspective of visual and scenic character.⁸³

The presence of Parker and Langley in Bryce Canyon indicates that the proper degree of oversight was accomplished in the park, and that the trails into the eroded canyons below the rim did not destroy the landscape that they were designed to access. This seems particularly important since NPS standards for trail construction were not formally published until 1934, after the completion of most of the scenic trails in BRCA.

When finally published, standards specified a width of four feet "accommodated by cutting into the slope or by benching the supporting ground with a dry-laid wall of large stones." On trails constructed across steep slopes, battered, drylaid, stone retaining walls could be used on the downslope side to support the trail tread or on the uphill side to prevent the erosion of rocks and earth onto the trail. Grades not exceeding 15 percent were recommended,

⁸¹ Thomas C. Parker, Associate Engineer, "Engineering and Construction Report for Zion and Bryce Canyon National Parks," Report for July, 1931 attached to Cope's report to Chief Ranger Donald J. Jolley. File: Reports to Superintendent, 1931, Archives, Zion National Park, Utah.

⁸² McClelland, *Presenting Nature: The Historic Landscape Design of the National Park Service 1916 to 1942*, p.118.

⁸³ *Ibid.*, pp. 136-137.

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although 18 to 20 percent grades were acceptable for distances of up to 150 feet, if said design would avoid excessive construction costs.⁸⁴

The character of the geological formations within the park likely created unique challenges for trail design, construction, and ultimately, for maintenance. Indeed, all of the trails constructed within the park do not conform in all manner to the NPS trail standards. They do however, represent park-specific solutions developed by NPS engineers and landscape architects to the problem of leading visitors into the "sculpture garden," without damaging the landscape.

⁸⁴ McClelland 1993, pp. 141-142.

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PROPERTY TYPES AND REGISTRATION REQUIREMENTS

The most appropriate way to establish property types is to group resources that share association with a specific administrative entity. The two entities primarily responsible for the development of buildings and other structural improvements within BRCA are the UPC (representing the exclusive concessioner within BRCA during the historic period) and the NPS. Thus, one property type will include cultural resources primarily associated with the UPC, and the second property type will include cultural resources associated with the NPS. Each property type will include a variety of buildings and structures that are not comparable on the level of their physical characteristics or their function. Their most meaningful similarities lie in their historical association with different administrative entities.

Property Type #1: Resources Associated with the Utah Parks Company

■ Description of Resources Associated with the Utah Parks Company

Resources in this category include the Bryce Canyon Lodge Historic District; the Bryce Inn (a.k.a. the general store, the head house, or the cafeteria); the service station; several buildings now located in the Mixing Circle; and the water catchment and distribution system for the park. The water catchment and distribution system includes the UP pumphouse and well site, Shaker and Trough springs, and the UP water storage tanks.

The physical and geographical characteristics of these resources, and the manner in which they are configured (i.e., singly in groups or districts) varies considerably due to their functional differences. However, they share a common administrative history in that they all were constructed by the UPC. Within this group of associated properties, the Bryce Canyon Lodge Historic District has already been determined eligible for listing in the National Register of Historic Places (10/24/79). In the 12 years since completion of this Determination of Eligibility, the majority of the standard and economy cabins (approximately 102 historical buildings) have been removed from the Bryce Canyon Lodge Historic District. In 1987, the Bryce Canyon Lodge and the 15 "Deluxe" duplexes and quadruplexes were designated a National Historic Landmark (NHL; Harrison 1986).

With the exception of the water catchment and distribution system, most of the resources identified above occur in relatively close proximity to the plateau rim, either in a district configuration (as the Bryce Canyon Lodge Historic

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District) or as individual buildings (such as the service station and the Bryce Inn).⁸⁵ The choice of siting — within close but measured proximity to the plateau rim — facilitated visitor access to the park's vistas while at the same time protecting those vistas from intrusive elements.

In addition, the majority of the buildings in these complexes share the creative design concepts of Gilbert Stanley Underwood, the UPC architect who worked on the complex over a ten-year period. The distinctive characteristics of Underwood's rustic design include: the use of an exposed framing system on large scale buildings; steeply pitched hip or clipped gable roofs with wood shingles applied in a wave pattern; the use of logs and poles at entries and in roof truss systems exposed on the interior of buildings; and, heavily textured stone in foundations and chimneys. These buildings can be considered examples of the "rustic" style of architecture, the development of which is a nation-wide phenomenon and of national significance. This architectural theme is also expressed in buildings designed by NPS architects working in the Branch of Plans and Design, and that were added to the complex late in its developmental history, after Underwood had completed his work for the UPC. Even the Service Station (constructed 20 years after completion of the original lodge complex), incorporates the use of rustic materials, although the design of the building reflects contemporary architectural trends.

Resources that supported the tourist infrastructure but with which park visitors did not come into daily contact include those associated with the Bryce Canyon water catchment-distribution system.⁸⁶ This sub-category of resources includes both sites and structures. Unlike the accommodations, the location of these support facilities is dependent upon environmental characteristics, such as the presence of reliable springs and the topographic features that facilitate the engineering of the distribution system. Thus the main water collection system is located in the East Creek drainage basin, outside the park boundary. Currently, resources at the UP Pumphouse and well site consists only of the remains of historical buildings and structures. The development at Trough Spring and Shaker Spring formerly contributed to the water storage system, however, these improvements have been abandoned. Similarly, the original redwood storage

⁸⁵ It should be noted that prior to the removal of the approximately 102 historical buildings within the Bryce Canyon Lodge historical district, it would have been relatively easy to include all of these resources in a large district with building clusters connected by road corridors. However, given the reality of modern configurations, the value of these buildings as individual entities will be considered.

⁸⁶ Another district which formerly served as a concessioner support facility was the complex known as the "Concessioners Utility Area." This complex was located about one-quarter of a mile directly west of the Lodge area. When the NPS moved the original alignment of the rim road in the 1950s, the buildings included in the Concessioner's Utility Area, (including a "stable," "garage," and "power house") were destroyed or moved to different locations within the park.

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tanks have been replaced with modern metal tanks. The majority of the component parts of this water catchment system have been replaced within the past 20-30 years; however, the new components have been constructed at the same sites as their historical counterparts.

■ Significance of Resources Associated with Concessioner Development

Properties included in this category may be listed under National Register criteria A and C, and will likely be determined to be significant at the national, state or local level. When considered as a whole, the Bryce Canyon Lodge Historic District, Bryce Inn, the service station and the UP Water Catchment System all should be considered interdependent components of the tourist-related infrastructure within the park. From the initial construction of the lodge and standard and economy cabins, through the construction of the cafeteria and housekeeping cabins to accommodate the automobile trade, and to the final construction of the service station within the park, the evolution of the UPC complex is a study in the changing patterns of western tourism. This type of development is mirrored in other national parks in the region and throughout the western states in general. The large railroad companies and their subsidiaries possessed the desire (and the capital) to provide accommodations to tourists in the national parks. The UPC tourist facilities within Bryce Canyon are representative of this significant historical pattern, and are therefore eligible for listing in the National Register of Historic Places under criterion A.

Buildings designed by Underwood should also be considered eligible under National Register criterion C. Underwood's preeminence as an innovative designer of buildings in the rustic genre has been established by Harrison (1986). These buildings include not only Bryce Canyon Lodge and the Deluxe Cabins, but also the standard cabins, and the utility and special purpose buildings in close proximity to the lodge. The lodge and deluxe cabins represent the most complex of Underwood's designs. However, his unifying design themes are reflected in the less elaborate buildings within the district including the standard cabins, and support buildings (the linen house, pumphouse, and employee housing facilities).

■ Registration Requirements

For the most part, the buildings and structures included in this property type were developed according to a master site plan — each component of which provided a slightly different type of accommodation or service to tourists visiting the park. In order to qualify for listing in the National Register of Historic Places under criteria A and C, the buildings and structures built or commissioned by the UPC and which occur in district configurations, must possess integrity of materials, workmanship, and design as these concepts relate to exterior surfaces. Buildings should also

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occupy their original locations, and the setting of the district as a whole should not be compromised by the addition of intrusive elements. Interior spaces can contribute to the significance of a specific building, if the original floor plan and interior surface finishes have been retained.⁸⁷ However, the eligibility of a district or group of buildings (which has already been established) should not depend upon whether or not the interiors of individual buildings possess integrity.

Individual buildings eligible under criterion A should possess integrity of materials, workmanship, and design with respect to exterior surfaces, and be located in their original locations. Interior spaces can contribute to the significance of a specific building, if the original floor plan and interior surface finishes have been retained. In some cases, moved buildings may be considered eligible if the location and setting of the building is similar.

Resources Associated with National Park Service Administrative Development

■ Description of Resources Associated with NPS Administrative Development

Resources in this category include the district known as the Old NPS Housing Historic District, the old administration building, the comfort station and overlook shelter at Rainbow Point, several buildings currently located in the Mixing Circle, the old dump road, several stock driveways, the travel paths and overlooks within the park; and buildings and structures in the North Campground. Like the resources associated with UPC development, the physical and geographical characteristics and the manner in which they are configured (either singly or in groups or districts) varies considerably due to functional differences. The majority of the buildings in the Old NPS Housing Historic District, and the old administration building were determined eligible for listing in the NRHP in 1979.⁸⁸

Buildings included in this property type were constructed to house NPS personnel, to provide space for, or otherwise facilitate, NPS administrative activities and to provide public restroom facilities ("comfort stations"). Since the UPC provided most of the tourist related services, the number of service-oriented buildings constructed by the NPS within BRCA is small. Depending upon their intended purpose, they occur in public or private areas, either singularly or in groups. NPS housing is removed from the plateau rim, away from public roads and areas where tourists congregate. By contrast, the administration and service buildings are found in proximity to areas of high tourist traffic — near overlook areas and in campgrounds. The only housing area of historic age occupies the flank of a timbered

⁸⁷ This would include finishes which represent "replacement in kind".

⁸⁸ HS1, included in the original DOE for this property has since been destroyed by fire. Also, a small building known as the wood dispenser, and a garage were not included in the original DOE.

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knoll, east of the Bryce Canyon Lodge complex. Buildings located within this district are isolated from public view by the moderately dense native vegetation. Although the buildings vary in size, they share material and design features, such as steeply pitched gable roofs, multi-pane double hung windows, and the use of weatherboard for exterior siding. Their construction style appears to have been developed to complement the appearance of the original ranger's dwelling (HS-1), which was constructed in the late 1920s and which has since burned. The buildings that remain in the district were constructed in the early 1930s, and during the later part of the New Deal era (1937-1939).

In general, the administrative and public service buildings share a simple rustic style. They are log buildings, constructed with materials that are native to the area and which mirror the scale of resources found in the natural landscape. These buildings were intended for public use and are located in areas heavily used by park visitors. Structures (stone retaining walls and culverts) also make use of locally available materials, and usually occur in concentrations or in association with trails. Some retaining walls consist of drylaid random courses of rough cut stone, while others contain mortar.

The trails constructed under the authority of the NPS can also be divided into two functional categories. The majority were built to facilitate viewing of the park's natural geological features. These would include the Rim Trail, as well as the many shorter trails that provide access to the canyons and amphitheaters below the rim between Fairyland Point and Bryce Point. The Under-the-Rim-Trail, as well as the four associated trails that connect it with the plateau rim, were built for administrative access, primarily for access to backcountry areas in the event of fire.

Trails built to provide access to the sculpted land forms below the overlook, were sited in areas that would be inconspicuous when viewed from the Rim Trail (at the edge of the Paunsaugunt Plateau). No attempts were made to take shortcuts. Rather, these trails follow circuitous routes (generally off of the ridgetops), which wind through the eroded hoodoos and amphitheaters below the plateau rim. These paths are located in areas where natural pathways do not occur, such as on steep side slopes where switchbacks and retaining walls are often necessary. Shielding these trails from view from the plateau rim sometimes necessitated construction of tunnels through narrow sandstone ridges. The stairways that were originally built to carry a trail below the plateau rim were removed during the 1960s and replaced with paved ramps.⁸⁹ Due to the heavy pedestrian traffic that these trails receive, they are well maintained, and continue to reflect NPS trails standards. There is some overlap in terms of use by horses and pedestrians, but some of the pedestrian pathways are unsuitable for horseback travel in terms of grade (e.g., the Navajo Loop Trail through "Wall Street").

⁸⁹ These ramps should be counted as noncontributing .

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Administrative trails differ from scenic trails not only in terms of the areas that they access, but also the character of the trail itself. Ridge tops and high country areas are not avoided, rather they are used as the most direct route between two points. The administrative trails are not as well maintained as the scenic trails and their overall integrity is lower. For example, in some areas where the trail has eroded (eg. in drainage bottoms), alternative routes are reestablished simply through use rather than by the deliberate reconstruction of tread.⁹⁰ It should be noted that both scenic and administrative trails are susceptible to natural erosional forces. Thus any registration requirements that relate directly to integrity will have to be flexible enough to accommodate rerouting due to natural erosion.

The paths currently designated as stock driveways within BRCA tend to be located in relatively gently sloping drainages that connect the Paunsaugant Plateau with the Tropic Valley on the east side of the park. These stock driveways differ from trails in terms of their width and the character of the area that they access. Both of the stock driveways overlap with other park uses. For example the Tropic Canyon stock driveway follows the same path as the old dump road. In this area, one can see remnants of the original road prism which varies in width between 8 and 12 feet. However, since the road is no longer maintained, its continued use as a livestock corridor has accelerated erosion and deterioration of the constructed grade. Similarly, the Sheep Creek stock driveway also functions as the Sheep Creek connecting trail, providing access from the plateau rim through the Sheep Creek drainage to its intersection with the Under-the-Rim Trail.⁹¹ Here, too, the character of the pathway is more similar to a vehicular road, in terms of width and grade, than to the scenic and administrative trails. Although the Sheep Creek stock driveway is reported by park personnel to be used on a regular basis, apparently, the use is insufficient to establish a recognizable path along the entire length of the route. During HRA's field investigation, evidence of the path was obscured by vegetation at the east and west ends.

⁹⁰ During the field inventory, HRA personnel noted many aspen trees with historic-age graffiti carved in the bark. Most of these trees have been previously recorded as historic sites. The significance of these types of resources should be re-evaluated (most have been recommended as ineligible properties) in terms of whether or not they may contribute to the eligibility of particular trails.

⁹¹ A segment of new pedestrian trail (approximately three-quarters of a mile in length), has been constructed on the top of the plateau to connect the old Sheep Creek stock driveway/connecting trail with the NPS parking area and trailhead. This pedestrian path diverges from the old driveway at the head of the Sheep Creek drainage. It is oriented approximately north-south and parallels the Rim Road.

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■ 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 NPS clearly reflects the range of activities in which its personnel were involved during the historic period. Buildings, structures, and sites indicate the types of services offered to the public and the character of facilities available for park employees. Certain buildings and structures are also associated with New Deal era programs and may be considered representative of that period.

Some individual buildings and districts may be found to be representative of the "rustic" style of NPS architecture, and therefore are 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 compliment the natural elements of the western landscape. Within Bryce Canyon NP, NPS-designed buildings include both log and wood frame buildings, the latter finished with materials that impart a rustic appearance. Similarly, BRCA's scenic trails (including the Rim Trail and those located below the rim between Fairyland Point and Bryce Point) and administrative trails (including the Under-the-Rim Trail and the Riggs Spring Loop Trail) are representative of the principles of landscape architecture as applied to circulation systems, and may be considered eligible under criterion C.

The only resources for which it is difficult to justify significance are the stock driveways. This is partially due to the fact that these paths are used for a variety of purposes and in some areas the physical evidence of their use as stock driveways is at best seasonal. Although the paths are currently designated as stock driveways, neither was originally constructed specifically for the movement of stock. Both the Tropic Canyon and the Sheep Creek stock driveways originated as wagon roads to connect the communities on top of the Paunsaugunt Plateau (e.g., Panguitch) with the agricultural settlements at the base of the east side of the plateau. They pre-date the establishment of the park, and have existed as NPS administrative entities for a relatively short period of time, i.e. since the NPS decision to limit the number of pathways by which local ranchers could move stock through the park. Indeed, all of the paths that connect the Paunsaugunt Plateau with the Tropic vicinity have likely been used for the movement of stock. A complete study of travel routes through the park will be necessary in order to determine the historical significance of these paths.

■ 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 materials, workmanship, and design as these concepts relate to exterior surfaces.

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Buildings should also occupy their original locations, and the setting of district configurations should not be compromised by the addition of intrusive elements. Interiors can contribute to the significance of a specific building, if the original floor plan and interior surface finishes have been retained.²² 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.

Integrity of location and setting will be an important contributing element to buildings in district configurations, and proposed as eligible under criteria A and C. However, integrity of location and setting is not critical for individual buildings recommended as eligible only under criterion C. Some moved buildings may be eligible if they currently occupy areas similar to their original location, and retain their historical appearance as it relates to the originally intended function.

As stated previously, the scenic trails within the park are best appreciated as components of a larger district, which as a whole is representative of NPS landscape architecture. A contributing trail will be one which lies within 10 feet of its original location for more than 75% of its length. Modifications (re-routing) due to natural erosion or rock slides, should not be sufficient to eliminate a trail from eligibility. However, structural modifications that result in the elimination of particular distinctive engineering features erode integrity and can eliminate a specific trail segment as a contributing component of the resource.

The paving of previously unpaved trails included in the Scenic Trails Historic District would constitute an adverse effect since the use of natural surfaces was one of the ways in which trails were made to appear unobtrusive on the landscape.

Geographical Data

All of the resources included in this submission are located wholly or partially within Bryce Canyon National Park, Garfield and Kane counties, Utah.

²² This would include finishes which represent "replacement in kind" or the use of materials that present an appearance that is similar to historical appearances.

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Summary of Identification and Evaluation Methods

This Multiple Property Submission results from a contract between the NPS Rocky Mountain Regional Office and Historical Research Associates (HRA). Representatives from the NPS Rocky Mountain Regional Office and from Bryce Canyon National Park identified the resources within Bryce Canyon NP to be evaluated and nominated as part of this project.

An administrative history of Bryce Canyon NP prepared by Nicholas Scratish formed the basis for the development of historical contextual material. Scratish's work was expanded upon to develop the historical contexts within which to evaluate resources. HRA personnel conducted additional historical research in the Bryce Canyon and Zion National Park Libraries and in NPS Record Group 79 available at the Rocky Mountain Regional Office of the National Archives in Denver, Colorado. Researchers used primary documents collected from the National Archives by Scratish, and documents collected from the Union Pacific Railroad Archives in Omaha, Nebraska by a representative of the Bryce Canyon Natural History Association (BCNHA)--all available at Bryce Canyon National Park Headquarters. In addition field personnel conducted oral interviews with a number of BRCA maintenance employees. Berdell Barton, Kelly Shakespear, and Moyle Johnson provided an abundance of valuable information regarding modifications to buildings and to trails that have taken place within the past 30 years.

The buildings and structures included in the inventory and those that are now included in this nomination represent the results of concessioner and NPS administrative development during the historical period. Several National Register-eligible resources have been identified previously within the park. These include two historic districts (the Old NPS Housing Historic District and the Bryce Canyon Lodge Historic District), two buildings at Rainbow Point (the comfort station and overlook shelter), and the old administration building (currently referred to as the nature center). Within the Bryce Canyon Lodge Historic District, the Lodge and the fifteen Deluxe Cabins have been designated a National Historic Landmark. With few exceptions, these determinations (finalized in 1979), and the National Landmark designation (finalized in 1987) were based upon the exterior appearance of buildings, and did not consider the interior spaces.

For the buildings included in the Old NPS Housing Historic District and the National Historic Landmark buildings in the Bryce Canyon Lodge Historic District, the RMRO asked that HRA document only the interiors, and to determine specifically which interior elements (if any) contribute to the building's significance/eligibility. The majority of the buildings included in this category have remodeled interiors. The extent of remodeling varies between complete rearrangement of the interior floor plan, to the replacement of original interior wall and floor surfaces with modern

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materials. Because district eligibility has already been established, recommendations regarding individual building interiors do not affect the eligibility of the district as a whole.

The remainder of the buildings included in this inventory required both interior and exterior documentation. With the exception of the old administration building and the Rainbow Point overlook shelter and comfort station, these are maintenance/service buildings that have been moved from their original locations. For the most part these moved buildings are now located in the area referred to as the mixing circle. A few buildings (Bryce Inn and two comfort stations in the North Campground) remain in their original locations and were simply overlooked during previous inventories.

In addition to the buildings noted above, this project incorporated the recordation and evaluation of several types of structures that have not been included in previous inventories. These include: stone retaining walls and culverts; resources associated with spring improvement and water catchment systems (i.e., concrete collection tanks, iron pipes, fences, etc.); irrigation features; and trails. In some instances stone retaining walls occur as components of trails or overlooks, in other cases they are associated with campground development.

Documentation of most structures included photographing the resource and placing the individual features on existing topographic maps or site plans. Documentation of most structures included photographing the resource and placing the individual features on existing topographic maps or site plans. Field documentation of trails included hiking the length of the trail, and documenting its physical characteristics (both "unique" and "typical") through written notes and photographs. Physical characteristics include the width and steepness of the grade, the presence of distinctive engineering features such as switchbacks or retaining walls, the topographic orientation of the trail (i.e., river grade, ridge top, etc.), and the overall level of maintenance.

The research and inventory efforts resulted in the recordation of a wide variety of buildings and structures all of which are generally associated with the development of Bryce Canyon National Park for recreation purposes during the historical period. Within this basic context, sub-themes include concessioner development and NPS administrative development. In addition, the influence of landscape architecture and the development of rustic building design affected both concessioner and NPS improvements. The two property types identified as part of this nomination are based upon historical associations rather than function or use. Thus one property type includes resources constructed by the concessioner, and the other resources constructed by the NPS. Integrity standards are based upon a complete sample of representative properties.

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Waugh Reports

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