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# United States Department of the Interior

## NATIONAL PARK SERVICE

1849 C Street, N.W.  
Washington, D.C. 20240

IN REPLY REFER TO:

2280

To: Michele M. Hellickson  
Superintendent, Petrified National Park  
National Park Service  
United States Department of Interior  
Holbrook, AZ 86028

The Director of the National Park Service wishes to inform you of our determination pursuant to the National Historic Preservation Act, as amended, and Executive Order 11593 in response to your request for a determination of eligibility for inclusion in the National Register of Historic Places. Our determination appears on the enclosed material.

As you know, your request for our professional judgment constitutes a part of the Federal planning process. We urge that this information be integrated into the National Environmental Policy Act analysis and the analysis required under section 4(f) of the Department of Transportation Act, if this is a transportation project, to bring about the best possible program decisions.

This determination does not serve in any manner as a veto to uses of property, with or without Federal participation or assistance. The responsibility for program planning concerning properties eligible for the National Register lies with the agency or block grant recipient after the Advisory Council on Historic Preservation has had an opportunity to comment.

Attachment



# United States Department of the Interior

## NATIONAL PARK SERVICE

1849 C Street, N.W.  
Washington, D.C. 20240

IN REPLY REFER TO:

### DETERMINATION OF ELIGIBILITY NOTIFICATION

National Register of Historic Places  
National Park Service

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Name of Property: Rainbow Forest Historic Designed Landscape-Petrified Forest National Park

Location: Navajo County

State: Arizona

Request submitted by: Michele M. Hellickson, Superintendent, Petrified Forest National Park

Date received: 02/21/01

Additional information received : 3/20/01

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Opinion of the State Historic Preservation Officer:

☒ Eligible      ☐ Not Eligible      ☐ No Response      ☒ Need More Information

Comments: The AZ SHPO agrees with the Park that this district is eligible for listing in the National Register. The SHPO also concurs with the Park on the proposed boundaries. However, the SHPO and Park disagree on the definition of a "designed landscape" as outlined in National Register bulletin, *How to Evaluate and Nominate Designed Historic Landscapes*, the contributing and noncontributing resources and the essential character-defining features of these resources.

The Secretary of the Interior has determined that this property is:

☒ Eligible      Applicable criteria: A, C      ☐ Not Eligible

Comments: see attached sheet

  
(for) Keeper of the National Register

Date: 4/03/01

## **Determination of Eligibility**

National Register of Historic Places

National Park Service

April 2, 2001

### **Rainbow Forest Historic Designed Landscape Navajo County, AZ**

The Rainbow Forest Historic Designed Landscape is eligible for listing under Criteria A and C for Conservation, Engineering, Entertainment/Recreation, Politics/Government, Architecture, and Landscape Architecture under the category of "district." The period of significance begins in 1929 with the Park Service's initiation of a planned development project at the park that included the design and construction of a formal plaza surrounded by administrative buildings, residences and service buildings, picnic areas, parking lots, roads, trails, and a water pipeline. The period of significance ends in 1942 when the development project was essentially completed and the CCC camp at the park was disbanded. The historic context for the park Service's process for planning, landscape design, and construction is documented in the Multiple Property Listing, *Historic Park Landscapes in National and State Parks*.

National Register bulletin, *How to Evaluate and Nominate Designed Historic Landscapes*, defines a designed landscape as:

a landscape that has significance as a design or work of art; was consciously designed and laid out by a master gardener, landscape architect, or horticulturalist to a design principle, or an owner or other amateur using a recognized style or tradition; has a historical association with a significant person, trend, event, etc. in landscape gardening or landscape architecture, or a relationship to the theory or practice of landscape architecture.

The Rainbow Forest district resulted from a significant comprehensive park planning initiative carried out in the late 1920s and 1930s by the NPS Western Field Office, headed by Thomas Chalmers Vint. Vint's initiative gave serious attention to coordinating roads and trails with the construction of park villages, ranger stations and maintenance areas. Though development took place over 13 years, the Rainbow Forest complex was designed as a cohesive unit with interconnecting circulation systems and designated areas to serve administrative and other needs. The National Bulletin on designed landscapes states that complex designed landscapes such as Rainbow Forest, fall under the district category of a "geographically definable area which possesses a significant concentration, linkage or continuity of sites, buildings, structures, and/or objects united by past events or aesthetically by plan or physical development."

The Rainbow Forest district gains significance under Criterion A as a project associated with the administration and development of Petrified Forest National Monument for visitor use and enjoyment. With its haphazard collection of small cabins and informal roads and trails, Rainbow Forest was an ideal candidate to obtain assistance under Vint's comprehensive park planning initiative. The 1989 draft National Register nomination, prepared by the NPS Denver Service



Center and submitted as supplementary information to this DOE, states, "...the uneven management of the monument, conflicts between the custodians and local communities arising from fierce boosterism, and the lack of decent Government visitor facilities made it clear that planned development showing a strong NPS presence was needed at Petrified Forest."

The district also gains significance under Criterion A for its association with the work of the Civilian Conservation Corps (CCC) and the short-lived Emergency Conservation Works program that made possible the development and improvement of national parks at an unprecedented speed. One of the most important CCC projects undertaken at Rainbow Forest was the construction of a water pipeline, running from Río Puerco to Rainbow Forest complex that provided an essential amenity to visitors and park staff. The CCC and Emergency Conservation Work also developed foot trails, improved roads, and constructed some buildings in the residential area.

The Rainbow Forest district is significant under Criterion C because it embodies the distinctive characteristics of National Park Service building and landscape construction as defined in the historic context of *Historic Park Landscapes in National and State Parks*. Park designers at Rainbow Forest employed elements of the "American style of naturalistic landscape design" by blending manmade structures with the natural surroundings. The small, low, rectilinear buildings made of graystone, the material also used for the culverts along the roads and trails, draw upon the surrounding natural environment and the traditional pueblo building style, as well as the Art Deco style of the period. The formal design of the main plaza is evocative of the park village plaza, initially promoted in the Park Service in the 1910s by Charles P. Punchard, the first NPS "landscape engineer." Punchard's plaza concept had roots in the Beaux Arts movement with clusters of administrative and commercial buildings constructed around a formal village square. In *Building the National Parks*, Linda Flint McClelland writes that Punchard, "established the precedent for the village plaza, having a common architectural character that would occur in national parks throughout the 1920s and 1930s."

The Rainbow Forest district is formed by a continuity of sites, buildings, and structures, united by past events and aesthetically by plan and physical development. There is an important interrelationship between the designed plan and the individual resources (sites, buildings, and structures)--the designed plan and the individual resources depend upon the other to convey significance. The spatial relationship of individual resources is important in defining the historic character of a designed landscape. The integrity of a designed landscape district can be negatively impacted if contributing resources to the district, such as bridges, buildings or roads are altered or demolished, even though the basic, outlying form of the landscape design remains intact. Intrusions upon the land, such as new roads or buildings, alter the spatial balance of historic resources and the overall design, which also negatively impacts the integrity of a district.

The National Register has determined the following resources as contributing to the Rainbow Forest District:

- the Visitor Center (Bldg. 1) is a contributing building

- all of the buildings surrounding and adjacent to the small residential plaza are contributing (Bldgs. 50, 51A, 51A1, 51A2, 51C, 51D, 51E, 52C, 52B, 52A, 53, 100, and 101). The alterations to Bldgs. 50 and 53 do impact their integrity, but not enough to consider them as noncontributors.

- the main plaza is a contributing site. The plaza is able to convey significance for two character-defining features that remain relatively intact: its linear, axial form which is defined/framed by the surrounding buildings; and its historic use for automobile circulation. The 1989 draft nomination, submitted as supplementary information to this DOE states, "the focal point of the Rainbow Forest headquarters development was the museum/visitor center/administration building, set at one end of a long, linear parking plaza also used as a roadway...When it was first built, the parking plaza provided a sense of visual and spatial separation between the concessioner's buildings and the NPS development. At the end of the parking area the Museum occupied a primary focal point." Because of alterations to the interior of the plaza during and after the period of significance, the space no longer has a primary focal point (the Museum), which detracts from its linear quality. The loss of a primary focal point, however, does not impact integrity significantly enough to consider the plaza non-contributing.

- the bridge across Jim Camp Wash, on axis with the Museum, is a contributing structure and marks an entrance to the plaza.

- the road system, including the Long Logs Road, is a contributing structure. Culverts and other minor features associated with the roads are not counted as separate resources.

- the Giant Logs trail system is a contributing structure

- the Long Logs trail system is a contributing structure

- the Long Logs parking area is a contributing site. The walls and curbing are not counted as individual resources, but are included in the site.

- the reconstructed Agate House is a contributing building

- the agate foundation is a contributing site

- the CCC-built water pipeline is a contributing structure

The following resources are non-contributing:

- the Lodge is noncontributing due to substantial alterations from the 1960s. The building was tripled in size, its vertical height was increased, and it was sheathed in concrete block and stucco.

- the visitor picnic/campground area is a noncontributing site. This area was substantially altered after the period of significance when overnight camping was no longer permitted at Rainbow Forest. A rectilinear, paved parking lot replaced the circular road surrounding the campground,

and new ramadas and shelters were constructed. The nonhistoric shelters and the ramadas are noncontributing, but because of their insubstantial size and scale are not counted as separate resources.

- the covered residential picnic area is a noncontributing structure

The Park's proposed boundaries encompass the concentration of resources associated with the major development project carried out from 1929 to 1942: Jim Camp Wash Bridge; the main plaza and residential area; the Giant Logs trail system; a portion of the spur road that leads from old US 180/260 and the former park entrance to the main plaza; the agate foundation and trace of the pre-1932 road; Long Logs road, parking area, trail system, and the reconstructed Agate House. The boundaries do not incorporate all of the significant resources associated with the 1929--1942 development project, such as the Petroglyphs Road and the entire spur road leading from the plaza to old US 180. With further documentation, the National Register believes that a larger district than what is proposed in this DOE is potentially eligible.



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February 22, 2001

Michele Hellickson  
Superintendent  
United States Department of the Interior  
National Park Service  
Petrified Forest National Park, AZ 86028

reference  
SHPO-2000-2300 (5010)  
GC

**FAXED**

re: Petrified Forest, Rainbow Forest Designed Landscape, Eligibility

Dear Ms. Hellickson,

Thank you for conveying, in your letter of February 2, 2001, Jill Cowley's response to my comments pursuant to the decision on whether this office was in concurrence with your determination of National Register eligibility of the Rainbow Forest Designed Landscape.

It is obvious that there exists some misunderstanding; and I feel obliged to offer the following clarification of the major points of my comment:

My suggestion, that the *Statement of Significance* should be more specific, was made in reference to its lack of any identification of a recognized style, theory or practice of landscape architecture which would distinguish a *Designed* Historic Landscape from an *Historic* Landscape as defined in Bulletin 18. The style employed in the Rainbow Forest Headquarters Complex, for example, differs appreciably from that of Long Logs Trail and Parking Area; and the significance conveyed in each remains discrete. As it is now written, the Statement of Significance generalizes the extant range of stylistic expression at the Park under the unconvincing characterization of "National Park principles of Rustic Design and construction. This would seem to be little more than a reiteration of the Historic Context used pursuant to Criterion "A" in the Statement of Significance.

The Pueblo Deco Museum/Administration Building and its site development which convey an origin within the Beaux Arts/City Beautiful tradition is less comfortable in its inclusion within the category of *Rustic*, than would be the Agate House, for instance. This generalization of significance, within National Park principles, is insufficient to determine the contributing features of a formal design of axial symmetry, equally as well as those of the Rustic or Vernacular. Consequently the designation of contributing features, as written, is problematic and seems qualified only by age of construction and integrity of initial appearance rather than upon an origin within a shared recognized style or theory of landscape design.

Hellickson, February 22, 2001, page two

The artful concept informing the relationship between buildings and features of an axial, symmetrical composition is more studied than is the case of an informal setting in which deference to the natural features of circumstance is signified. (Jill evidently misread a verb in my use of the adjective "studied.") Moreover, the design intention indicated in stylization, distinguishes between proximity or juxtaposition and *relation*. Thus vehicular passage through the Parking Plaza may be found not to contribute, but rather to intrude upon the integrity of the architectural parti from which the Museum/Plaza/Bridge composition originates.


The argument that this passage cum highway is "original," and therefore worthy of preservation, assumes equivalency between coincidence and origin in simultaneous developments. The Plaza originates in art, while the road connection evidences a discrete origin in pragmatic practicality.

I do not disagree with Jill's response that Park Landscapes historically evidence contrast of formal and informal design features. However, this reinforces the observation of discretely Designed Historic Landscapes within the proposed Historic District; and the practicability in designation of design significance specific to each.

This level of specificity would delineate the separate issues of the Bridge and the evolving traffic patterns that currently are joined only in conflict. Additionally, this improvement of the *Statement of Significance* would ease the transition, in future, toward consideration of Mission "66 landscape components that, within the Park Service generally, are perceived to be in conflict with "National Park Principles of Rustic Design and Construction".

If you wish further assistance or clarification of comment, I may be reached @ (602) 542-6943.

Sincerely,



Robert R. Frankeberger, AIA  
Architect, State Historic Preservation Office

cc: Jill Cowley, IMSF  
Greg Cody, IMDE