



Western Gold and Silver Mining Heritage: A Need for National Park Recognition

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Received for peer review 9 July 2024; revised 6 September 2025; accepted 15 December 2025; published 15 May 2026

ABSTRACT

The growth of the US National Park System is an important preservation story that shows the historical, ecological, political, and cultural character of the nation. Proposals for new units follow both agency plans and individual or group initiatives. The study of proposed units that fail reveals much about NPS criteria and public attitudes. This article adds to the literature about unsuccessful proposals by explaining why NPS does not have a unit interpreting the gold and silver mining rushes that helped open the entire conterminous West. We detail the criteria by which new proposals are judged, the impact of the Historic Sites Act of 1935, and contrast national historic landmarks with other designations that have full inclusion in the park system. After establishing the significance of precious metal mining in American history, we then identify 10 reasons why specific proposals collapsed, five based on public reactions and another five stemming from NPS itself. Finally, we briefly consider whether opportunities still exist to interpret this major part of the American experience.

Key terms: National Park System, new park proposals, National Park Service criteria, gold and silver mining, the conterminous American West

The National Park Service (NPS) encompasses a diverse collection of natural environments and cultural and historic sites of national significance. Its growth from the establishment of Yellowstone National Park in 1872 to the present has been shaped by deliberate planning, political influence, scholarly advice, legal strictures, and public acclaim. At more than 430 units today, the American National Park System is diverse and serves as the model for other preservation systems around the world. A massive literature exists on nearly every park in the system, usually documenting the legal origins of each. Throughout the decades many more places have been proposed and sometimes investigated for national park status but failed to be added to the roster. Today architects and builders often study unsuccessful construction projects to learn the reasons why they failed. More recently, other scholars have begun to study programs of government agencies and private companies that fail for similar reasons. A growing literature has begun to analyze failed park proposals to better understand NPS culture and political stature.

We have already studied more than 250 failures in just three states— California, Montana, and Alabama (Dilsaver 2008: 7; Dilsaver and Wyckoff 2009: 8; Dilsaver and Weber 2024: 115). Each failed proposal for a new park exposes elements of the agency's performance and character. This article looks at failed park initiatives from a different perspective. We ask why there are no national park units

in the American West that are focused on the region's gold and silver mining heritage, arguably one of the key historic drivers of economic development and environmental change in that important region. We explore how the 1935 Historic Sites Act (49 Stat. 666) shaped the process of evaluating proposals for new parks, including sites that focused on precious metals mining in the West. Should

they be fully within the system or deserving a more limited form of agency protection in the National Historic Landmarks (NHL) Program? We also detail the criteria by which new proposals are judged and what NHL status means. After establishing the significance of precious metal mining in American history, we then identify 10 reasons why specific proposals collapsed, five based on public reactions and another five stemming from NPS itself. Finally, we briefly consider whether opportunities still exist to interpret this major part of the American experience.

THE HISTORIC SITES ACT OF 1935

Any proposed park focused on precious metals mining in the West would be considered under the jurisdiction of the Historic Sites Act of 1935. The Historic Sites Act established an Advisory Board on National Parks, Historic Sites, Buildings, and Monuments, now known as the National Park System Advisory Board. Originally composed of a group of “conservation-minded individuals” (e.g., academics, museum curators, archivists, etc.), its members counselled the National Park Service at a time when the field of historic preservation was still in its infancy. In 1976, Congress directed NPS to provide a list of potential new units of the National Park System and, in 1980, to prepare a system plan. This direction was withdrawn in 1998 and replaced with a mandate only to provide Congress with a prioritized list of potential candidates for study each year. Potential new units are also identified in the Department of the Interior’s annual legislative program (Mackintosh 1985; NPS 2023).

CRITERIA FOR JUDGING PLACES PROPOSED FOR THE NATIONAL PARK SYSTEM

In considering any new proposed park, section 1.3 of *National Park Service Management Policies 2006*, the current NPS management handbook, directs that proposed additions to the system must meet four legislatively mandated criteria: (1) national significance, (2) suitability, (3) feasibility, and (4) need for direct NPS management. The first and foremost is “national significance.” Though qualitative and subjective, the question that a new area must satisfy is, “How important is the resource to the entire nation?” This includes both its level of interest to the American people and whether it is the best representation of an historic or natural resource theme. NPS professionals, in consultation with subject-matter experts, scholars, and scientists, will determine whether a resource is nationally significant. An area will be considered nationally significant if it meets all the following criteria: (1) it is an outstanding example of a particular type of resource; (2) it possesses exceptional value or quality in illustrating or interpreting the natural or cultural themes of our nation’s heritage; (3) it offers superlative opportunities for public

enjoyment or for scientific study; (4) it retains a high degree of integrity as a true, accurate, and relatively unspoiled example of a resource.

If Congress orders NPS to investigate the national significance of a potential new park, senior Park Service specialists are enlisted to reduce subjectivity as much as possible. Agency experience has always counted heavily in proposed area surveys. When ordered to evaluate a potential national seashore, one field team member asked for further explanation of the concept. His supervisor responded that he would know it when he saw it (Everhart 1994). Sites that are “not of national significance” are rejected as unqualified.

The second criterion is feasibility. Factors include a site being of sufficient size and appropriate configuration to ensure sustainable resource protection and visitor enjoyment, current land ownership patterns amenable to the operations of a national park unit, minimal economic and socioeconomic impacts, minimal potential threats to the resources, and the anticipated costs associated with the development, management, and operations of a potential national park unit (NPS 2022a).

The third criterion is suitability. A site must represent historic events, resources, or themes that are not interpreted or available for public visitor experience and understanding at comparable sites within and outside of the national park system. The sites may also fill under-represented topic areas identified in the National Park Service System Plan (NPS 2017b).

In 1998, Congress ordered the fourth criterion—can the resource be protected and made available to the public by another government agency or private organization? Budget-conscious legislators worry about the costs of an expanding park system (NPS 2005). In 1972 NPS classified the national and historical resources of the nation to seek full coverage in the system (NPS 1972a; 1972b). Eighteen years later, a second effort focused just on natural history (NPS 1990b). These “wish lists” codified a time-honored procedure for senior managers and environmentalists who rationalized political campaigns for new parks by citing gaps in the system.

NATIONAL HISTORIC LANDMARKS

In addition to achieving full protected status as a national park, other options also exist for protecting and interpreting historic gold and silver mining sites. In the Historic Sites Act of 1935, Congress also authorized the National Historic Landmarks (NHL) program, originally called

the Historic Sites Survey, one of the earliest efforts to establish a nationwide system for historic preservation in the United States. There are just over 2,600 national historic landmarks, including buildings, sites, objects, and districts (NPS 2024a). All NHLs are also listed on the National Register of Historic Places. A historic site may be important enough to receive designation as an NHL if it: (1) is the location with the strongest association with a turning point or significant event in American history; (2) is the best location to tell the story of an individual who played a significant role in the history of the United States; (3) is an exceptional representation of a particular building or engineering method, technique, or building type in the country; (4) provides the potential to yield new and innovative information about the past through archaeology (36 CFR (Code of Federal Regulations) Part 65).

Most NHLs are owned by private citizens and organizations, corporations, Tribal governments and other entities, or federal, state, or local governments. The federal government owns fewer than 400 NHLs (15% of the total). The laws that govern property rights still apply to NHLs. Designation of a property as a national historic landmark does not give ownership of the property to the National Park Service or any other agency of the federal government (NPS 2022b). In some instances, NHLs have been added to the National Park System in response to NPS changing its evaluation of what constitutes “national

significance.” As former NPS Bureau Historian Barry Mackintosh explains, the agency incorporated

new scholarship in the fields most closely associated with historic preservation—archeology, ethnography, architectural history, and history—and explored the past in new ways, through such lenses as class, ethnicity, folklore, sex, race, sexuality, vernacular architecture, and landscapes. Over time, these shifts have enlarged the universe of nationally significant themes, contexts, and topics in American history in a way that would have not been conceivable in the early days of the program. They have permitted the recognition of resources that once might have been overlooked (Mackintosh 1985).

THE SIGNIFICANCE OF GOLD AND SILVER MINING IN THE AMERICAN WEST

In a 1959 historic sites survey for the park system and the NHL program, William Everhart wrote, “The initial pattern of settlement of the Far West was largely determined by the location of its mineral wealth” (1959: 1). Many of the major mining sites across the West that he identified later became national historic landmarks but did not become fully protected units of the National Park System (Table 1).

Why should there be a national park unit focused on precious metals—specifically gold and silver—mining in the West? We argue that this chapter of our national

TABLE 1. Mining sites in the conterminous United States proposed by Everhart (1959) for inclusion in the National Park System.

Proposed Site	Fate of Proposal	Date of Action	Status
Bodie, CA	Became state property	1961, 1962	State park, NHL
Coloma, CA	Became state property	1942, 1961	State park, NHL
Columbia, CA	Became state property	1946, 1961	State park, NHL
Comstock, NV	Became mix of state and private property	1931	Virginia City, NV, and other sites form NHL
Deadwood, SD	Not feasible; private property	1961	NHL
Georgetown–Silver Plume, CO	Not feasible; mix of local government and private property	1966	NHL
Goldfield, NV	Not feasible; private property	2009 studied, no action	Private
Mother Lode, CA	Not feasible; mix of state and private property	1965	Some individual sites are NHLs
Tombstone, AZ	Not feasible; mix of town-owned and private property	1961	NHL
Virginia City, MT	Not feasible; mix of state and private property	1961	NHL
Virginia City, NV	Not feasible; mix of private and government property	1961	NHL

NHL = national historic landmark

history is undeniably highly significant, given the formative importance of gold and silver mining in the West. After the 1848 gold strike at Sutter's Mill in Coloma, California's population of 10,000 non-natives rose more than 310% in 10 years. Miners also swarmed across the interior portions of the mountainous West and sparked similar rushes in other parts of the English-speaking world (NPS 1967; Koschmann and Bergendahl 1968; Marks 1994; Nash 1998; Rosen 2005). The gold and silver booms led to rapid settlement in the 11 conterminous western states plus South Dakota and resulted in catastrophe for Native Americans. A web of transportation links, including the transcontinental railroad, and every other form of "civilization" followed. The surge of wealth produced in these fevered hunts for precious metals led to American industrialization and funded the Union side during the Civil War. Mining accelerated development of the West by at least 30 years and jump-started many of the region's major cities (Gilbert 1958: 48–53).

Elements of the early gold and silver mining rushes exist in dozens of NPS units in the 12 western states. None of them interpret the full history of mining or its role in settling the vast region. Many thousands of argonauts traveled to "see the elephant," as they called the experience. An enormous literature exists about rushes in Arizona, California, Colorado, Montana, Nevada, and South Dakota plus lesser fields in the other six states (see Figure 1). Only a few sources attempt to tell the overall story of precious metal mining over the next 50 years following the 1848 California gold strike (Rohrbough 1997; Nash 1998: 276–292; Paul 2001; Brands 2002).

WHY DOES NPS NOT HAVE A GOLD OR SILVER MINING SITE?

NPS has periodically recognized the significance of this mining history but has failed to act. In 1966, NPS Historian John Hussey sought ways to preserve the gold rush history of California's Mother Lode region along the Sierra Nevada foothills. He stressed the need for action, stating, "the discovery of gold in California in 1848 and the great rush to the California mining districts that followed were events of major significance in the development of the United States." He added that, "this phase of the country's history is not adequately represented in the national park system" (Hussey 1966: 1).

More recently, historians and other scholars continue to emphasize the era's significance. Geologists James Craig and J. Donald Rimstidt wrote in 1998:

The California Gold Rush of 1849 was one of the major events in all of history, drawing prospectors world-wide, and set the scene for subsequent rushes such as those experienced in Australia, South Africa, and Canada. That

event increased American production some 70-fold and quadrupled total world production in less than 5 years.

In 2024, historian Elliott West added:

Think of flashes on a map. The first to flare are on the eastern slopes of the Sierra Nevada and in the Front Range of the Rocky Mountains just before the Civil War. Others pop and brighten from the northern Rockies southward almost to Mexico. Each flare and glimmer was a discovery of gold or silver following California's great coincidence of 1848. Each set in motion changes of a speed and scale unique in westward expansion.... California's strike brought a quickening pace of federal action—construction of roads, coping with Indian resistance, and surveying rail routes—that opened the western interior to more strikes that brought their own changes. The enormous wealth taken from the earth fed an expanding economy as new operations changed one of humanity's oldest enterprises into an industry that rivaled any others in its scope and complexity. Their methods of financing, including the most fantastic chicanery, pioneered the mechanics and psychology of marketing mass desire.

In June 1976, President Gerald Ford signed legislation that created Klondike Gold Rush National Historical Park (PL 94-323), which commemorates the rush of 1896–1899. The campaign took 14 tortuous years, facing stiff opposition from some Skagway, Alaska, residents who feared the intrusion of NPS into their community (Norris 1996: 149–158). But the Klondike NPS unit and its counterpart in Seattle focus entirely on this penultimate episode of the American gold rushes (the final one was the Nome gold rush of 1898–1900, also in Alaska, after which precious metal exploration has been carried out by large corporations there rather than individual stampedees). What of the half-century of discoveries, booms, and busts across the conterminous United States that preceded it? The failures of proposals for representing the full history of precious metal mining in the West are diverse but they fall into two major categories—(1) negative reactions by the public, including businesses, and (2) opposition from within NPS itself.

PUBLIC AND INDUSTRY OPPOSITION

Public and industry opposition frequently has rendered proposals infeasible or unsuitable. Specifically, we argue that resistance to mining-focused park units from the public has come from five different directions.

Opposition from Mining Companies

NPS Historic Preservation Officer Robert Spude, who throughout his career sought to have the system add a precious metal mining site, explained how modern

corporations threaten historic mining zones (Spude 1990: 4): “Large-scale mining resumed at Virginia City, Nevada; Cripple Creek, Colorado; and other areas using new technologies of open cut mining and heap leaching processing. Contemporary technology has created massive, large scale threats to the historic scene.”

In 1954, a proposal surfaced to make Bodie, California, the largest ghost town in the West, a national historical park, but nothing happened. Many potential mining sites remained in the area. In 1961 the townsite was designated a national historical landmark and a year later a state historical park (Huston and Tilghman 1997; NPS 2019a). Today more than 100 buildings still stand in and around the town and some building interiors remain as they were left, a few still stocked with goods and furniture. But Congress had not acted to save the larger Bodie Basin as a unit of the National Park System. As a result, Galactic Resources, Ltd., a Canadian mining corporation, proposed developing the site in the early 1990s. In this case, Congress had to intervene with additional legislation to prevent mining development and help the state of California protect its famous “arrested decay” town (NPS 2019a; Online Archive of California, 2024). Today, Bodie

is a California State Park (Figure 1). In June 2025 the state agency submitted an update for the site’s NHL status that

defines a boundary, revises the statement and discussion of significance in accordance with current scholarship and NHL Program guidelines, and provides a current inventory of contributing and noncontributing resources. This information can aid California State Parks, its partners, and other owners in planning, resource management, and interpretation (NPS 2025).

Opposition from Individual Miners with Claims

Not only mining companies, but individual claim holders are also concerned with saving the opportunity to mine when economic conditions improve or the recreational whim strikes them. Spude (2015) noted that every effort to add a mine site, or even a historical area where ore was once found, to the National Park System brought immediate and vigorous opposition. In 1989 the Park Service investigated alternatives for the Georgetown–Silver Plume Loop in Colorado, including NPS management. Approximately 800 closed mines surround the towns 50 miles west of Denver. Pondering the 1976 Mining in the National Parks Act (16 USC 1901 et seq.), a committee of miners responded:

FIGURE 1. Miners’ Union Hall, Main Street, Bodie, California, ca. 1930s. LIBRARY OF CONGRESS, HISTORIC AMERICAN BUILDING SURVEY



The National Park Service and the mining industry are, in practice, incompatible. Viable active mining operations in territory controlled by the Park Service are so rare as to constitute ‘exceptions to the rule.’ In most cases, submission to Park Service regulation by the miner, especially the small miner, is an invitation to bankruptcy. Location of new claims within territory controlled by the Park Service is not allowed. And, if development of an existing mining property is deemed by the Park Service to ‘be in derogation of park values and purposes and cannot be sufficiently modified to meet this standard,’ then the Park Service ‘will seek to extinguish the associated mineral right.’ No mine owner can expect to attract capital when his mineral rights are constantly threatened. His only protection, if the Park Service should decide to extinguish his mineral right, is a long and expensive court battle, which he may not be able to afford (Mining Committee 1989: 9).

Opposition from Mining Town Residents

A second source of opposition to a mining national historical park in Georgetown and Silver Plume came from the people in the two former boomtowns. In 1966 both towns were added to the National Register of Historic Places. Both had dozens of structures from that era and presented opportunities to interpret the larger mining story as part of a booming post-mining tourist trade. Deterioration of the aging infrastructure led some locals to contact the NPS for advice and to discuss possible inclusion in the National Park System (NPS 1989a: 6). In 1976 Congress amended the 1970 General Authorities Act to study and monitor the welfare of places with enough national significance to have potential as units of the park system (PL 94-458). After a spate of local and state plans to somehow save the buildings fell apart, the Park Service added Georgetown and Silver Plume to the list of proposals. A 1980 reconnaissance survey recommended a full study of alternatives be presented to the townsfolk. In the resulting study, the seven alternatives offered boiled down to three real options: no action, financial and perhaps technical help from NPS but without the agency’s actual presence, and full incorporation into the National Park System (NPS 1980b: 1).

The result was a furious conflict between organizations such as, on the one hand, the Colorado Historical Society and The Georgetown Society, Inc., that wanted NPS to take the burden of preservation off themselves, and, on the other, a group known as Friends for an Independent Georgetown who feared condemnation of their homes, a restructuring of the landscape, and the loss of any role for themselves in running the towns. This included a rising anti-government emotion manifested in the so-called “Sagebrush Rebellion.” NPS promised that it would abide by the decision of voters in the towns and surrounding area. Despite a vigorous media campaign in the towns

and in a watchful Denver, only about 54% of the ballots were returned. Those who favored addition to the system mustered 21% of the vote while those opposed to any NPS action garnered 46%. The remainder wanted some form of federal money with very constrained NPS participation (NPS 1989b). The *Rocky Mountain News* reported:

Now what kind of a community with an economy heavily based on tourism would resist being designated a national park? We can name two places right off hand: Georgetown and Silver Plume (“Bucking temptation,” 1989).

Competition from Tourism Providers

In some cases, NPS faces competition from tourism developers who see a different role for the old boomtowns than the educational one espoused by the agency. When faced with a public campaign to make Virginia City, Nevada, a national historic landmark, a recognition that brings little more than a plaque to town, local entrepreneur Lucius Beebe wrote in the *San Francisco Chronicle* on July 7, 1961:

When, as it recurrently does, the possibility of becoming a public monument raises its head, Virginia City prudently recalls that much of its conduct might not prove acceptable to the federal government. Its economy is based on the availability of fun and games on a twenty-four-hour basis, on a multiplicity of gorgeous saloons and the presence of a form of commerce known as ‘the girls.’ The answer to any proposal of State ownership or private endowment is met with the query, ‘Did you ever try to get drunk in Williamsburg at three in the morning? Or: How many roulette games are there in Columbia?’

Loss of Political Support for the Proposed Unit

Goldfield, Nevada, was not a major mining site identified by Everhart or in most other early surveys, but it had something much more valuable—strong political support. In 2008 Senate Majority Leader Harry Reid, who hailed from Searchlight, Nevada, requested an NPS reconnaissance survey of the Goldfield area, which was the center of a gold mining boom during the first decade of the 20th century (NPS 2009). The study team concluded that the town was nationally significant for its gold mining and labor histories. However, the National Parks Omnibus Act of 1998 (112 Stat. 3497) had ordered the agency not to undertake any full investigations without a congressional order. The reconnaissance survey team was unable to determine Goldfield’s suitability and feasibility as a national park unit. Opposition from some of the locals in Nevada’s least-populated county further hindered the proposal. Senator Reid then became deeply involved in other priorities that took most of his time and eventually he retired in 2017.

Without his powerful legislative influence, the campaign soon withered.

FIVE REASONS WHY THE NATIONAL PARK SERVICE WITHHOLDS SUPPORT

As important as the public antagonism can be toward any NPS or other federal presence in many old mining regions, the agency has had its own reservations about including a unit that would have myriad expenses, dangers, and maintenance problems. Five types of rationales to oppose a mining park have defined National Park Service reluctance.

Opposition to Saving Industrial Sites

One of the earliest proposals for an historic mining unit in the National Park System was the Comstock Lode near Virginia City, Nevada. Conrad Wirth, who would later be the NPS director, visited the mine in June 1931 and recommended its establishment. He noted that the president could proclaim it as a national monument using the Antiquities Act if the site were donated to NPS and funds for access roads, new buildings, a museum, and visitor safety measures could be raised. Wirth had no reservations about the historical significance of the site.

A few months later, Yellowstone Superintendent Roger Toll (1931), the lead NPS investigator of potential new parks, visited the site. His report to Director Horace Albright not only evaluated the Comstock property, but offered an opinion on the suitability of any mining sites in the park system. After admitting that they may have value because of their impact on the settlement and development of the country, he suggested that mining, like agriculture, was conducted by “individual effort rather than national action.” He added that “the history of such events should be preserved by various industries, by commercial associations or by the people of the localities most directly interested.” Toll then focused specifically on the Comstock shafts, pointing out the dangers to visitors. He suggested that the town of Virginia City was already a popular attraction that only needed better signage and interpretive brochures. These steps, he concluded, were better handled by locals (Toll 1931). This cast doubt on the Comstock Mine and other mines proposed for the National Park System. Later that year the worsening Great Depression also led a company to restart mining in one of Comstock’s shafts.

Belief that States Should Preserve Mining Sites

Often when NPS does not want a site it suggests that the state preserve it (Dilsaver 2008; Dilsaver and Wyckoff 2009; Dilsaver and Weber 2024). NPS’s involvement with proposals to create parks associated with the California gold rush provides an example. In 1928, Horace Albright, who would soon succeed Stephen Mather as NPS director,

toured the gold rush town of Columbia in Tuolumne County with Frederick Law Olmsted, Jr. (a primary author of the National Park Service’s Organic Act) and convinced him to include it in his 1928 survey of potential state parks (Olmsted 1928). Later Albright contacted Bay Area natives V. Aubrey Neasham, an NPS historian; Newton Drury, the leader of the Save the Redwoods League (and future NPS director); and Joseph Knowland, a politician and newspaperman. He urged them to do whatever they could to make the town a state park. Five years later Drury secured data from Colonial Williamsburg on how to turn Columbia into a similar tourist attraction. California legislators appropriated \$15,000, but that fell woefully short of the amount demanded by owners of the historic buildings in the town (Hosmer 1981: 414–419).

As the 1948 centennial of the original Mother Lode discovery approached, the initiative received more support. As a California employee, Drury had worked on state acquisition of the overpriced buildings in the town and convinced the residents that it would not become a museum but instead a “living village” like Williamsburg. On July 15, 1945, Governor Earl Warren moved his office to Columbia for one day. There he signed State Bill 1256 creating Columbia State Historic Park (Friends of Columbia State Historic Park 2024). Joseph Knowland then asked Aubrey Neasham to help the state plan Columbia’s development in early 1947 (Hosmer 1981: 434–437).

Neasham had already worked with two archaeologists from the University of California, Berkeley to uncover the timbers of John Sutter’s mill on the American River where James Marshall first found gold (Neasham 1947). He asked for an unpaid leave of absence from NPS to develop a plan for the new state historic park and organize various gold rush centennial programs. By then, Newton Drury had assumed the role of NPS director and had no problem granting the request. Neasham worked with the California Division of Beaches and Parks from October 1, 1947, until early April 1949 organizing the park’s structural development and interpretation. NPS employee Dorr Yeager added a study of museum possibilities in Columbia (NPS 1949). Upon his return to NPS, Neasham’s expertise led to assignments evaluating other mining sites in the West (Hosmer 1981: 414–419, 432–437, 1142). Both Neasham and Drury left NPS to take jobs with the California state park agency in the early 1950s. In the mid-1960s, the California gold rush preservation focus became a parkway along the entire Mother Lode to connect the disparate gold rush sites along California Highway 49. The towns were booming again, this time with retirees and those leaving the urban coast to settle the historic camps and their hinterlands. Antagonism arose from a perception among locals that

federal authorities would dismiss their ideas, override their economic concerns, and turn the towns into something undesirable. Some locals feared becoming an overcrowded tourist trap with skyrocketing land values. This NPS proposal drew support from agency historians, but failed to gain any traction.

Individual Sites that Lack the Means to Demonstrate National Significance

Many proposed mining sites have not had the resources to interpret the complete history of that important episode in the growth of the United States and thereby make the case for having national significance. This may result from their small-scale operations in the past or the decay or loss to theft of their infrastructure and objects. For example, the small town of Volcano, California, had been part of the Mother Lode Parkway proposal before it failed in 1966. Shortly thereafter the tiny town with its reconstructed historic center appealed for help from NPS to stop officials rezoning the area to allow development by cement companies. Assistant Director Jackson E. Price offered sympathy but no help.

Some sites retained more elements of national significance when active mining concluded but thereafter suffered from the decay or even collapse of historical structures, rampant vandalism, and theft of interpretive materials. Forty years after Joshua Tree's origin as a national monument in 1936, the Park Service planned to make Keys Mill a focus of interpretation for the nation's bicentennial. Bill Keys had milled ore there until the 1950s. It remains a popular attraction for visitors within the park. Yet, historic preservationists found so much damage and theft that the project had to be abandoned (Dilsaver 2016: 288).

Costs and a Lack of Funding or Labor

Cost is a feasibility factor that hinders efforts to save a mining town. During the 1930s, citizens of Tombstone, Arizona, approached the Park Service asking its support for efforts to have the town added to the National Park System as a national historic site. Retired Director Albright favored the idea, historian W.R. Hogan reported that the town was of national significance and merited such recognition, and Senator Carl Hayden from Arizona introduced a bill to establish it. NPS could not find funds to buy the land and buildings and could do no more than encourage local preservation efforts. Director Arno Cammerer brushed off the disappointed Arizonans stating that the agency could not commit to Tombstone without doing a survey of all the western mining towns, and that was not possible because, with recent passage of the Historic Sites Act of 1935, all the agency's historians were too busy studying historic places in the East. Locals

eventually formed an organization called Restoration of Tombstone, created a six-block historic district, and scrambled for private supporters (Hosmer 1981: 365–371).

Another aspect that renders some places infeasible is the potential danger to visitors. Mining areas have open pits, decaying infrastructure, and tailings with mercury, cyanide, and other dangerous chemicals. Abandoned mine lands threaten visitors and bedevil managers at national parks like Joshua Tree. There the legacy of more than 8,000 claims from before 1936 will cost many millions just to close the open stopes and shafts to errant visitors while allowing bats to pass back and forth freely.

Echoing Roger Toll's concern, a factor that continues to discourage these proposals is the fear of toxic chemicals present at abandoned mining lands (AMLs). NPS already must deal extensively with AMLs, having identified 37,050 such features in 133 units of the park system (NPS 2014a). Most (81%) of these features are in southern California desert parks. Of the features identified, 1,799 (4.8%) already have received long-term remedial action to address human health and safety and environmental problems, 3,814 (10.3%) need remedial action, and the remainder (84.9%) have been characterized but do not require action (NPS 2014a). Logan Hovis, a mining historian and blasting officer with the NPS Alaskan Region, is an expert on remediation of mining sites and mitigation costs. Drawing on his expertise, ways to control these threats have been found (NPS 2019b; Saleeby 2000). The price is steep but efforts are underway in some parks. Such treatment is warranted for major park units that preserve and interpret a procession of events that deeply influenced the entire country.

General Opposition from NPS Officials with Different Priorities

The case of Virginia City, Montana, exemplifies the many pitfalls and frustrations that can lead to failure when trying to get support from NPS officials. The gold rush town attracted a population of 10,000 during the mid-1860s. However, better strikes elsewhere reduced the town to fewer than 300 people by the mid-1930s. Faced with deterioration and imminent abandonment, residents sought a way to save the historic buildings. NPS sent park planner Olaf T. Hagen in September 1937 to inspect the town. He described it as “an unspoiled relic of Pioneer western life” and worthy of national recognition (NPS 1995: 14–15). However, in August 1938 NPS Regional Director Thomas Allen visited the town and reported that it was only of state or local significance. Temporarily rebuffed, Virginia City enthusiasts took matters into their own hands. On June 1, 1939, the *Billings Gazette* reported that the hotel and express office had been repaired and refurbished (Utley 1985).

During World War II, wealthy Great Falls ranchers Charles and Sue Bovey became fascinated by the historic town and began purchasing its land and buildings. The Boveys turned the town into a western version of Colonial Williamsburg with stabilized structures, museum artifacts, and living history enactments. After the war, Virginia City became a major tourist attraction, sparking new interest from the federal government. On July 4, 1961, the town was designated a national historic landmark. Five years later, after passage of the 1966 National Historic Preservation Act, many of the town's buildings were added to the National Register of Historic Places. In 1968, NPS Chief Historian Robert Utley reported that recently retired director Conrad Wirth was interested in saving the town by adding it to the park system. No action followed (NPS 1995: 35–67).

The next push for national park status came in 1979 when the agency's Rocky Mountain Regional Office listed the town as its number one priority for a new area study to fill a need for a mining town in the history thematic framework. A "reconnaissance study" completed in September 1980 concluded that still more studies were needed (NPS 1980a; Morgan 2008). Finally, in early 1994, Congress ordered the Park Service's Office of Planning to investigate the town and recommend some way to save the town's structures, which were again in serious

decay. A year later the Park Service released a study that included an in-depth overview of the acquisition costs, staffing and maintenance issues, and other considerations for the agency. Planners offered five alternatives for managing and protecting the town's historic resources. Option one was the standard "no change" which would not solve the problem. Option two was national park status. The other three fell somewhere in between.

The option ultimately chosen called for state purchase of most of the historic structures in both Virginia City and its neighbor Nevada City, and management by a state historic commission with financial and technical assistance from the National Park Service. This mirrors the decisions made by NPS for many similar mining site proposals. In this capacity, the Park Service would classify the area as an affiliated unit rather than an actual part of the National Park System (Montana Heritage Commission 2008; NPS 2018). In 2007, NPS briefly pondered moving its National Center for Preservation Technology and Training from Natchitoches, Louisiana, to the Montana ghost town. However, funding problems meant that the agency could not move its facilities and had to settle for an advisory role in what became a state and private preservation program (Figure 2).

FIGURE 2. A street in Virginia City, Montana. WILLIAM WYCKOFF



At least some in NPS felt that the agency never really wanted a mining site. NPS Historian Robert Spude (2015) asserted that the Rocky Mountain Regional Office never really cared about new historic sites, “focusing instead on natural resource areas, despite receiving a Washington Office order for them to find a mining site to propose.” Three decades earlier, Utley had already identified the internal rivalry within the agency that Spude blamed for the lack of historic mining preservation and interpretation:

I remain convinced that much of the institutional bias against our business [historic preservation] and much of the resulting mismanagement of historic resources is in fact correctable by a proper organizational alignment. Ernest [Connally, the first director of NPS’s Office of Archaeology and Historic Preservation] and I both labored for many years, but there was never any point at which we even began to approach it. The whole system vibrated with apprehension that the historians were about to take over, or were about to win more power within the organization, and that should not be allowed. And so our efforts fell by the wayside (1985).

WHAT SHOULD NPS DO NOW?

So, nothing exists in the National Park System to explain mining’s role in opening and settling the American West. What should the Park Service do about it? Does the park system need a unit to interpret this phase of American history? Given its accepted significance to the country—Yes. Do resources still exist for doing so? Some, but a dwindling number. Can NPS afford to acquire such property given the cost, safety issues, and public and corporate opposition? Probably not in terms of the fee simple (complete) ownership that characterizes the older units of the system.

The search for alternatives to NPS ownership is not new. As long ago as the 1960s, agency planners suggested Nez Perce National Historical Park, a collection of non-contiguous sites, as a model for a gold or silver rush park. Utley (1965) expressed doubt and frustration:

On two occasions during the past year, I have heard of ill-defined proposals to create a National Park Service area that would encompass the Old Sacramento Historic District, Sutter’s Fort, the Coloma gold site, and perhaps other related sites in a national historical park on the Nez Perce model. I have not heard of any such proposal crystallizing and, given the welter of conflicting interests involved, I doubt that the Service should take any public initiative. But these sites represent a rare concentration of some of the most significant historical values in the entire nation, and such a park would be an outstanding feature of the National Park System.

Others argued that the multiple pieces of Nez Perce formed a single sequential historical episode whereas a mining park would need to tell many stories scattered through time and place. Plus, the widely distributed physical structures and artifacts of the mining frontier are far more critical to understanding those stories. After the failure to gather public support for adding Georgetown–Silver Plume to the National Park System, one recommendation was to create a national historic landmark with five similar Colorado mining places, including Central City, Cripple Creek, Leadville, Silverton, and Telluride, in a “national heritage corridor” (NPS 1989a: vi). It too did not materialize.

Keweenaw National Historical Park (NHP) in the Upper Peninsula of Michigan is a unit of the National Park System that serves as a model recalling those earlier proposed solutions. This area, known as the “Copper Country,” is where the nation’s first and most extensive copper mining development took place beginning in the 1840s. The park is composed of two units corresponding to the two main companies active here: the Quincy Mining Company and the Calumet & Hecla Mining Company. The two units each contain a mixture of park-owned and privately owned land and structures. The park coordinates with 19 Keweenaw Heritage Site partners who manage 26 locations stretching across the Keweenaw Peninsula. These sites, located both inside and outside the Quincy and Calumet unit boundaries, are owned and operated by state and local governments, state universities, private businesses, and non-profit organizations. Keweenaw Heritage Sites operate independently of NPS—under three-way Memoranda of Understanding (MOUs) between each site, the park’s legislatively mandated Advisory Commission, and NPS—and contain significant cultural and/or natural resources that make a unique contribution to the national copper mining story (National Park Service 2014b: 13–14).

Seeking a non-federal alternative for the funding that would be necessary to preserve the thousands of structures, landscapes, and stories in the Copper Country, Congress established the first permanent Advisory Commission in the National Park System at Keweenaw NHP. This decision set the stage for the partnership arena in which the new park would operate. The Advisory Commission has seven persons chosen by the secretary of the interior. The purpose of the commission is to advise and assist the park on preservation and interpretation, liaise between the Keweenaw Heritage Sites and NPS, and “carry out historical, educational, or cultural programs which encourage or enhance appreciation of the historic resources in the park, surrounding areas, and on the Keweenaw Peninsula.” Funding for the Advisory Commission historically comes from the NPS Midwest Regional Office, Keweenaw NHP, grants, and individual donations (NPS 2017a: 1–10; NPS 2024b: 1–14).



FIGURE 3. A recent reconstruction of Sutter's Mill at Marshall Gold Discovery Historical State Park in Coloma, California. LARY DILSAVER

In the West, we believe that the Mother Lode region in California deserves another look. Several state parks, a host of local sites, and independent museums could use the Keweenaw model to form a cooperative association that could oversee a newly created Gold and Silver Rushes National and State Historical Parks. The logical place for an NPS visitor center is Coloma, sharing space with the Marshall Gold Discovery Historical State Park (Figure 3, above) on the site where James Marshall first found gold on January 24, 1848. The park's mission statement, based on that of Keweenaw (NPS 2017a: 7), could be:

The purpose of Gold Rush National Historical and State Parks is to preserve, in partnership with public and private entities, the nationally significant historical and cultural sites, structures, and districts of the California Mother Lode and interpret the historical, geological, archeological, cultural, technological, and corporate forces that relate the story of precious metal mining in the American West.

CONCLUSION

The search has failed for a western national park devoted to precious metals mining, despite its significance to the region's history and to the nation's economic and political development. Only distant Alaska interprets the last big gold rush near the end of its American boom. Ten types of problems have repeatedly blocked proposed parks in the conterminous Western states. Creating parks to highlight and interpret the country's heritage is the purpose of

the National Park Service. So far action outside Alaska has been restricted to the national historical landmark program. But we argue that the public focus and interest have always been on the roster of the official National Park System. This story is too big and the nation deserves a fuller accounting of how mining in the West transformed the country in lasting ways.

Nearly a century has passed since Roger Toll dismissed the Comstock Lode as unworthy of anything but local signage. Problems remain, particularly with physical and chemical hazards at closed mines and intervening development in the towns that supported them. While the integrity of the Comstock Lode as it existed in 1931 when Toll visited is lost, a partnership of co-managed private, state, and local sites can present the history of gold and silver mining in the conterminous West as Keweenaw does for copper mining in the Great Lakes region.

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