

From the 2025 Amendment to the Wilsonia Historic District Application – National Register of Historic Places

8. STATEMENT OF SIGNIFICANCE

Narrative Significance Statement

The following discussion of the Wilsonia Historic District in the 1960s and 1970s is intended to augment the existing Statement of Significance, and to provide justification for extending the end date to 1978.

As noted in 2010 Amendment, new cabins continued to be constructed in Wilsonia throughout the 1960s. In some instances, these new structures embraced more modern designs, such as the A-Frame. This often meant eschewing some of the more traditional details typical of earlier periods, such as small window openings with wood shutters, in favor of more expansive floor-to-ceiling windows. However, for the most part these later examples continued to employ the same architectural vocabulary that had characterized the Wilsonia for decades – modest scale; simple form and massing; pitched gable roofs; open eaves; shingle or metal roofing; wood exterior siding; stone or brick chimneys or metal flues; and attached wood patios and decks.

It was also during this period that the National Park Service (NPS) intensified its purchase of property in Wilsonia. The land acquisition program was initiated by the U.S. Congress back in 1932. However, the program was reinvigorated in 1965 with the passage of the Land and Water Conservation Act, which provided funds for the acquisition of privately-owned property within federal public lands, such as national parks.¹ Such non-federal property surrounded by federally managed public lands are known as “inholdings.” Despite being physically surrounded by public lands that are managed pursuant to federal law, inholdings are not subject to federal regulation. The Land and Water Conservation Act was enacted to facilitate acquisition of inholdings, thereby overcoming a series of land use challenges that potentially conflicted with public use, including inholder access; boundary disputes; burdens on efficient land management; barriers to public access; and adverse impacts from incompatible land uses.²

Because Wilsonia is situated within the boundaries of Kings Canyon National Park, the agency that oversaw acquisition of property in this inholding was the National Park Service. Following the passage of the Land and Water Conservation Act, the National Park Service sent letters to all inholders within national parks, including the property owners in Wilsonia, advising them of the new legislation and encouraging them to sell their private property. This new federal policy affected communities throughout the country, including in Wawona, California; Kelly, Wyoming; Glacier National Park, Montana; Grand Teton National Park, Wyoming; along the Appalachian Trail; in the Blue Ridge Mountains; and in many other locations.

Another Congressional push came in 1969 with the establishment of the Opportunity Inholding Program, which was specifically designed to facilitate the acquisition private lands within certain national parks.³ The stated purpose of the program was to establish a “willing buyer-willing seller” arrangement whereby homeowners would sell their property to the National Park Service at fair market value.⁴ The NPS set aside a portion of revenues from the Land and Water Conservation Fund for the expressed purpose of acquiring inholding property.⁵ According to NPS officials, the Opportunity Inholding Program “provides flexibility in acquiring inholdings because NPS, with a lump-sum appropriation, can acquire properties as they become available; it also helps NPS to better compete with private buyers by reacting quickly to purchase available inholdings and therefore block commercial or industrial development in the parks.”⁶

The land acquisition program was administered by the National Park Service’s Division of Land Acquisitions, which was responsible for the overall direction of the program. However, the primary responsibility for acquiring inholding

¹ Gene Rose, “Hearing On Park Inholdings,” *Fresno Bee*, September 4, 1978.

² Kellen Zale, “Inholdings,” *Harvard Environmental Law Review*, Vol. 46, 2022 (463-67).

³ “Hearing,” 1978.

⁴ Comptroller General of the United States, *Private Land Acquisition in National Parks: Improvements Needed*, September 20, 1976 (5).

⁵ “Hearing,” 1978.

⁶ Comptroller (2).

properties was delegated to local National Park Service employees called “realty specialists”:

Realty specialists’ duties include contacting inholders, requesting independent appraisals, negotiating terms and conditions of sale, and processing various claims or moving and selling expenses and other miscellaneous administrative matters. They are under the administrative control of the superintendent of the parks, although technical supervision is provided by the Division of Land Acquisition of the [NPS’s] regional offices.⁷

From the time of the Opportunity Inholding Program’s inception in fiscal year 1969 through fiscal year 1975, approximately 82,000 acres of inholdings had been acquired by the National Park Service across four national parks: Grand Teton, Olympic, Yosemite, and Sequoia-Kings Canyon.⁸

In Wilsonia, however, the pace of land acquisition was slow at first, as property owners generally resisted pressure to sell. While approximately a dozen Wilsonia properties were acquired through the program in 1969, the National Park Service acquired just one property per year for the next four years.⁹ Frustrated by the lack of transactions, the Division of Land Acquisition stepped up its efforts to incentivize inholders to sell their properties. A 1973 memorandum called for increasing the frequency of contact with property owners; more rigorous enforcement of applicable health and safety codes; and restrictions on any new development in the area, all in furtherance of the National Park Service’s ultimate goal of “total acquisition of Wilsonia.”¹⁰ This new posture toward land acquisition signaled a policy shift away from the more reciprocal willing buyer-willing seller approach initially outlined by the Opportunity Inholding Program.

In 1974, then superintendent Henry J. “Hank” Schmidt implemented new, more aggressive acquisition policies, including directing the local realty specialist to contact Wilsonia residents every six months by mail offering to appraise their property. These tactics appear to have been effective, as the National Park Service negotiated the purchase of 34 lots in 1974 alone, with ten more the following year.¹¹ By 1975, some 96 Wilsonia property owners had sold.¹²

In 1975, the Government Accountability Office (GAO), headed by the U.S. Comptroller General, undertook a study of the National Park Service’s land acquisition policies. As outlined in its September 1976 report, the GAO contacted 79 inholders in four national parks about the reasonableness of the NPS’s attempts to acquire their property, and found that “for the most part, complaints of NPS harassment were isolated to Wilsonia.”¹³ Specifically, property owners cited the frequency of letters, phone calls, and in-person visits from the realty specialists; overly strict enforcement of county building codes; difficulty in obtaining building permits or variances to improve or upkeep their property; the abrupt closure of snowmobile routes to the community; strict standards regarding water supply and sewage and disposal systems; and several instances taken as implicit threats of condemnation.¹⁴

As detailed in the GAO report, in late 1975 the Sequoia-Kings Canyon National Park’s acting superintendent acknowledged that the strict enforcement of building codes and county standards by the realty specialists was a “deliberate attempt to hold down prices and force sales.”¹⁵ Indeed, the policy had the effect of denying property owners building permits for even simple repairs: “Since no work could be done without a permit, NPS expected that the costs of needed repairs eventually would exceed the value of the property. NPS then planned to offer to buy the property from the inholder.”¹⁶ As owners were unable to maintain or improve their properties, cabins would fall into disrepair, having the dual effect of depressing its fair market value and incentivizing its sale.

⁷ Comptroller (5-6).

⁸ Comptroller (6).

⁹ “Government May Wipe Out Village,” *Tucson Daily Citizen*, July 31, 1974; David Waddell, “Wilsonia started before park,” *Tulare Advance-Register*, November 14, 1978. Sources differ on the exact number of properties acquired through 1969, ranging from 12 to 16.

¹⁰ Comptroller (29); “Wilsonia started,” 1978.

¹¹ “Wilsonia started,” 1978.

¹² Larry Wood, “Surrounded By Two Parks, This Village Refuses to Sell,” *Oakland Tribune*, October 5, 1975.

¹³ Comptroller (1); “Wilsonia started, 1978.

¹⁴ Comptroller (24-25, 27).

¹⁵ Comptroller (29).

¹⁶ Comptroller (29); “Wilsonia started, 1978.

Also around this time, existing snowmobile routes throughout Kings Canyon National Park were closed, limiting access to Wilsonia during the winter months. This action originated with a 1972 executive order establishing policies and procedures “to control the use of off-road vehicles, including snowmobiles, on public lands.”¹⁷ In response to this executive order, in late 1973 all parks within the Western Region were notified that new regulations were forthcoming that would “require the closing of all existing snowmobile routes” until such routes could be evaluated and a determination made as to which should reopen. In anticipation of the proposed regulations, officials at Sequoia-Kings Canyon National Park closed all snowmobile routes in February 1974, after giving property owners a 30-day notice.¹⁸ Because snowmobile routes were not closed in any of the other Western Region parks, including in nearby Sequoia National Park, this action by park officials was widely viewed as added pressure on Wilsonia inholders to sell their property. In 1976, it was announced that the proposed designation of snowmobile routes in Sequoia-Kings Canyon National Park was being withdrawn due to public opposition to any such routes in the park.¹⁹

Additionally, in 1975 a special-use permit providing access to a garbage storage area and a horse corral in Wilsonia was not renewed, effectively closing both facilities. The 5-year permit, which had been issued to the Wilsonia Property Owners Association in 1970, was not reissued on the grounds that exclusive privileges for such facilities was not permissible within the park.²⁰ While the revocation of access to these facilities and the closure of the snowmobile routes may not have been strictly associated with the NPS’s property acquisition program, these policies only compounded the existing frustrations of Wilsonia property owners.

Not mentioned in the GAO report was Wilsonia property owners’ frustration with the length of time between when a cabin was purchased by the National Park Service and its ultimate demolition and removal from the site. Once acquired, cabins would often be left to fall into a state of severe disrepair. As these are modest wood cabins in a forest setting and subject to harsh elements, neglect quickly leads to deterioration and ultimately to collapse. According to complaints, “In some instances, homes were left vacant and without maintenance for many years, detracting from the environment the park service purports to conserve.”²¹ Wilsonia property owners also noted that the National Park Service had “taken possession of cabins at Wilsonia and torn them down, only to replace them with large administration and maintenance buildings that are not in keeping with the mountain esthetics,”²² and used “one purchased cabin overlooking a meadow for their own functions.”²³

Taken together, implementation of these various policies in Wilsonia had the intended effect of disincentivizing the ongoing maintenance and improvement of existing properties, discouraging new construction on available lots, and encouraging property sales to the National Park Service. In March of 1974, the *Tulare Advance-Register* reported that “...no building permits had been issued in the last two months, a rate much slower than in the past.”²⁴ According to the GAO report, the National Park Service and its representatives were particularly aggressive in their implementation of these policies in Wilsonia beginning in 1969 through the early to mid-1970s.

However, beginning in late 1975, the National Park Service appeared to ease up on some of its policies. At this time, the acting superintendent of Sequoia-Kings Canyon National Park stated that, because of numerous complaints from inholders and other adverse publications, the park had revised its policy regarding building permits “so that its interpretation of the building codes was in line with the county’s requirements.” The new approach would be “to grant those variances that the county would grant outside the park,” and that “NPS would reject the county’s recommendation only in cases where a variance or waiver, if granted, would degrade the park.”²⁵

It was also determined that giving the realty specialists’ responsibility both for issuing building permits and for acquiring these same properties represented a conflict. As a result, “the practice of using the realty specialist to issue building

¹⁷ Comptroller (30).

¹⁸ Comptroller (30).

¹⁹ Comptroller (30-31).

²⁰ Comptroller (32).

²¹ “Wilsonia started,” 1978.

²² Gene Rose, “NPS Land Acquisition Policy Draws Heavy Fire During Hearing,” *Fresno Bee*, September 7, 1978.

²³ “Wilsonia started,” 1978.

²⁴ “Wilsonia Residents Fear Takeover by Park,” *Tulare Advance Register*, March 13, 1974.

²⁵ Comptroller (30).

permits has been changed” and that responsibility was shifted to the Chief Ranger.²⁶ In November 1975, the National Park Service notified the Wilsonia Property Owners Association that a permit would be issued for use of the garbage storage area. The storage area would be opened to the public to meet legal requirements, but the inholders would be required to maintain the area and pay for garbage pickup by the park’s garbage contractor. It was also announced at this time that “the superintendent has no plans to allow the property owners to continue to use the horse corral because no benefit to the park would result.”²⁷

In early 1976, the head of the Division of Land Acquisition, Western Region stated that the region “would continue to send contact letters to all inholders except those inholders located in the Wilsonia area of Sequoia-Kings Canyon National Park where the program was inactive because of the inholders opposition to the program.”²⁸ However, news that the NPS’s land acquisition program had essentially been put on hold was short-lived success for the property owners in Wilsonia, as even harsher policies were on the horizon. A cabin built by Charles E. Dirks of Northridge in 1976 appears to have been the last new cabin constructed in Wilsonia during this more permissive period.

In late 1977, the National Park Service escalated its land acquisition program and began enforcing strict new regulations on land use within all inholdings. In September of that year, new National Park Service Director William J. Whalen sent a directive to all park superintendents to stop any proposed “substantial new construction or substantial alteration” in all inholdings.²⁹ Further, the new policy stated that inholders would not be allowed to build on undeveloped property within the park system, and that anything more than a minor improvement to an existing building would constitute grounds for federal condemnation.³⁰ Then, in a letter to Wilsonia property owners dated November 30, 1977, the new superintendent of Sequoia-Kings Canyon National Park, David D. Thompson, announced the National Park Service’s new get-tough land acquisition policy, writing: “We cannot allow substantial improvements or changes of use that would be incompatible with the purposes for which the area was created or substantially increase the future acquisition cost to the United States.”³¹

With this latest policy shift, tensions between inholders and the National Park Service were reignited. In response, the National Park Inholders Association (NPIA) was formed to lobby against the acquisition program.³² Initially founded by property owners in Wawona, an inholding in Yosemite National Park, the NPIA soon evolved into a powerful national organization representing some 34,000 individuals across the country that owned private property within national parks.³³

In April 1978, more than 60 Wilsonia property owners attended a Tulare County Board of Supervisors hearing to express their frustration with the National Park Service’s latest posture toward inholdings. According to Ernest N. Mobley of the Wilsonia Property Owners Association, the National Park Service’s new tougher policies were preventing improvements to existing cabins in order to keep purchase prices down, and that “homeowners now are required to secure building permits from park rangers before obtaining one from county building officials.”³⁴ In response to the hearing, the Tulare County Board of Supervisors issued a statement in May 1978 opposing the National Park Service’s land acquisition plan and said it was “urging that land already acquired be returned to private ownership.”³⁵ By this time, the National Park Service “had so far managed to purchase about 45 of the 230 parcels of privately owned land [in Wilsonia].”³⁶

In September 1978, the NPIA, led by Charles Cushman, demanded a series of regional hearings to determine the future of the National Park Service’s land acquisition program, to be held in Fresno, Seattle, Denver, Atlanta, and Washington, D.C.³⁷ At the Fresno hearing, held on September 6th, Cushman argued that the National Park Service’s current policy exceeded its Congressional mandate, which established property acquisition on a willing seller-willing

²⁶ Comptroller (30).

²⁷ Comptroller (33).

²⁸ Comptroller (23).

²⁹ Robert A. Jones, “Town in Midst of Park is Fighting For Its Life,” *Fort Worth Star Telegram*, July 23, 1978.

³⁰ “Cushman tells park inholders to hold ground,” *Jackson Hole News*, July 21, 1978.

³¹ “Wilsonia started, 1978; David Waddell, “Weekend Land War I,” *Tulare Advance-Register*, November 13, 1978; David Waddell, “Weekend Land War III,” *Tulare Advance-Register*, November 15, 1978; Jim Foley, “Ire In Wilsonia,” *Fresno Bee*, April 5, 1978.

³² “Town,” 1978.

³³ “Cushman,” 1978.

³⁴ “Ire,” 1978.

³⁵ “Land war 1,” 1978.

³⁶ “Ire,” 1978.

³⁷ “Cushman,” 1978.

buyer basis only: “The mandate of Congress is not to acquire all the property but to protect the scenic easement.”³⁸ Mobley echoed Cushman’s claim, stating that “recent amendments to the policy would force the NPS to acquire all inholdings within four years,” but that according to the Congress, “it was not essential to eliminate all private uses within the parks’ boundaries; only that adequate lands be acquired for public use and enjoyment – along with control of adjacent lands to insure preservation of the primary purpose of the park.”³⁹ Cushman further suggested that “the new policy forbidding development of property constitutes an ‘inverse condemnation’ of private property.”⁴⁰ As such, Cushman proposed that the program be halted while the National Park Service explored other approaches to land acquisition.⁴¹

Having heard these arguments, regional director of the National Park Service’s Western Region Howard Chapman stated that “he would anticipate that if the other public hearings produced the same preponderance of adverse criticism that NPS Director William Whalen could amend the land acquisition policies.”⁴² In Wilsonia, the resistance of property owners was having an effect. Between 1976 and 1978, the National Park Service had managed to acquire an average of just three lots per year.⁴³

Following the five hearings around the country, the NPIA encouraged property owners to write their elected representatives in protest of what they deemed to be overzealous acquisition policies. Whether due to this public pressure, rising real estate costs, budgetary cuts, or some combination thereof, it soon became known that a revised land acquisition policy was being developed. Nonetheless, the Wilsonia Property Owners Association urged their readers to remain vigilant. As articulated in the Wilsonia Village, Inc. newsletter dated May 15, 1979:

The new, revised Land Acquisition Policy has been in draft form and under revision by the Congress and National Park Service since September, 1978. We have seen and reviewed a copy of the new Guidelines for Implementation. While changes have been made, it needs more refinement on some points. We urge you to continue to support the National Park Inholders Association. The effort must be continued to inform the Congressional personnel of our concerns...We feel our concerns are being considered by Congress and the National Park Service but YOUR LETTERS MUST KEEP THEM INFORMED of our concerns! Keep writing to your Congressman.

Finally in November 1979, after a nearly 10-year battle with inholders over property rights, the National Park Service announced what was being described as a “new enlightened policy” for acquiring properties within inholdings throughout the park system. In a dramatic reversal, NPS Director Whalen told a park system advisory board that the stronger acquisition guidelines adopted last year were a mistake, and that the new policy would emphasize the rights of property owners.⁴⁴ Research suggests that the issuance of building permits in Wilsonia, which had been effectively halted since 1974, resumed around this time. However, by this time the impact on the community of Wilsonia had been substantial. As noted in an article from November 1978:

*Since 1969, the park service has purchased 23 acres of Wilsonia land, including 72 lots and an estimated 50 cabins, for more than \$1.3 million. Some 62 acres, including 213 lots and about 200 cabins, remain privately-owned.*⁴⁵

The pace of land acquisition in Wilsonia waned in the early 1980s. The last acquisition of private property by the National Park Service took place in 1983.⁴⁶ Since that time, approximately 15 new cabins have been constructed in Wilsonia.

Despite this new development, Wilsonia remained in a state of gradual decline overall. Then in July 1991, a group of cabin owners met at the Wilsonia Clubhouse to discuss a strategy for moving forward. Soon thereafter, the Wilsonia

³⁸ “NPS Land,” 1978.

³⁹ “NPS Land,” 1978.

⁴⁰ “Cushman,” 1978.

⁴¹ “NPS Land,” 1978.

⁴² “NPS Land,” 1978.

⁴³ “Wilonia started,” 1978.

⁴⁴ “Land war 1,” 1978.

⁴⁵ “Wilonia started,” 1978.

⁴⁶ National Park Service, “Disposition Plan for National Park Service-Owned Structures in Wilsonia,” March 2013, 1.

Historic District Trust was established, with the goal of pursuing historic designation for Wilsonia's remaining structures. In September of that year, James Spitze reached out to the National Park Service on behalf of the Trust, asking for an "open and friendly dialogue" about historic preservation in Wilsonia. In response, Dr. William C. Tweed replied that the National Park Service would be "delighted" to join in such a dialogue, stating that the NPS's goal was "to preserve Wilsonia in private ownership as a low-density residential community." Tweed continued, noting that "since these also seem to be the aim of the WHDT, our interests seem to be substantially compatible," and that the National Park Service welcomed the opportunity to "support your goal of creating a Wilsonia Historic District."⁴⁷

With this new posture of cooperation, the WHDT was encouraged and motivated to pursue historic designation. After substantial fundraising, they retained historic preservation consultant Historic Resources Group (author of this Amendment) to research, document, and complete the registration form for National Register listing. These efforts were successful, and on March 14, 1996, the Wilsonia Historic District was officially listed in the National Register of Historic Places. This historic status had the effect of putting "an immediate halt to the NPS activities to buy and remove cabins."⁴⁸ Moreover, historic designation revived a sense of community pride and optimism, ushering in a new era of historic preservation and restoration in Wilsonia.

Period of Significance

As noted above, one of the purposes of this amendment to the original National Register Nomination is to extend the period of significance to 1978, and to provide justification for the period of significance end date based upon historical events and development patterns. The 1995 Nomination defined the period of significance as 1919-1945. The 2010 Amendment extended the period of significance to 1959 to include additional cabins that had achieved 50 years of age. This latest amendment extends the period of significance to 1978 in order to capture additional contributing cabins that were constructed during the implementation of the National Park Service's Opportunity Inholding Program. The end date of 1978 coincides with the National Park Service's development of a "new enlightened policy" of land acquisition, effectively ending the Opportunity Inholding Program, and marking a new period in the life of the Wilsonia community.

Through the 1960s, Wilsonia existed as a thriving recreational mountain community that included over 300 structures, including family cabins, two general stores, two restaurants, a community clubhouse, and three lodges that provided rooms and cabins for tourists and visitors. The year 1969 began a period of change for Wilsonia, as the National Park Service initiated its program to purchase and remove structures on private property, with the ultimate goal of total acquisition and repurposing of the land within the boundaries of Wilsonia. This effort created significant insecurity among Wilsonia property owners with regard to the community's continued viability, and resulted in a near complete halt of construction, modification, and in many cases, maintenance of Wilsonia cabins. Over the next several years, the stores, restaurants, lodges, and over 100 cabins were acquired by the National Park Service and demolished.⁴⁹

Despite policies that strongly disincentivized any investment or new construction in Wilsonia, development did not stop entirely during this period. Based upon the population of existing cabins, at least four new structures were built in the 1970s: one in each year of 1970, 1971, 1973, and 1976. As described above, in 1978 the National Park Service began developing a "new enlightened policy" of land acquisition, effectively putting an end to the Opportunity Inholding Program. The cabin at 83827 Laurel Lane, built in 1976 by Charles E. Dirks of Northridge, appears to have been the last cabin built under the National Park Service's previous policy.

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⁴⁷ William Tweed, letter to James M. Spitze, September 17, 1991.

⁴⁸ "Wilsonia Historic District Trust," Wilsonia Village website, <https://wilsoniavillage.com/whdt/> (accessed April 2025).

⁴⁹ This estimate provided by the Wilsonia Historic District Trust.

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