

**United States Department of the Interior
National Park Service**

**NATIONAL REGISTER OF HISTORIC PLACES
REGISTRATION FORM**

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking "X" in the appropriate box or by entering the information requested. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name: Red Lodge – Cooke City Approach Road Historic District

other name/site number: Red Lodge – Cook City Highway; Beartooth Highway; US 212; 24PA1255, 24CB1964, 48PA2310

2. Location

street & number: N/A

not for publication: n/a

city/town: Red Lodge and Cooke City, MT

vicinity: X

state: Montana **code:** MT **county:** Carbon **code:** 009 **zip code:** 59068 (see continuation sheets)

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act of 1986, as amended, I hereby certify that this X nomination request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property X meets does not meet the National Register Criteria. I recommend that this property be considered significant X nationally statewide locally. (See continuation sheet for additional comments.)

Signature of certifying official/Title

Date

State or Federal agency or bureau

In my opinion, the property X meets does not meet the National Register criteria.

Mary M. Hopkins / Mark F. Zaunler
Signature of commenting or other official

4/27/2013 / 5/8/2013
Date

WY SHPO / MT SHPO
State or Federal agency and bureau

4. National Park Service Certification

I, hereby certify that this property is:

X entered in the National Register
 see continuation sheet

 determined eligible for the National Register
 see continuation sheet

 determined not eligible for the National Register
 see continuation sheet

 removed from the National Register
 see continuation sheet

 other (explain)

Signature of the Keeper

Date of Action

[Signature]

5/8/13

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United States Department of the Interior
National Park Service

National Register of Historic Places Registration Form



This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in National Register Bulletin, *How to Complete the National Register of Historic Places Registration Form*. If any item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions.

1. Name of Property

Historic name: RED LODGE- COOKE CITY APPROACH ROAD HISTORIC DISTRICT

Other names/site number: BEARTOOTH HIGHWAY; US 212; REDLODGE - COOKE CITY HIGHWAY; 24PA1255, 24CB1964, 48PA2310

Name of related multiple property listing:

N/A

(Enter "N/A" if property is not part of a multiple property listing)

2. Location

Street & number: N/A

City or town: RED LODGE State: MT County: CARBON; Code 009 zip code 59068
COOKE CITY, state: MT county: Park code: 067 zip code: 59020

state: Wyoming county: Park code: 029 zip code: N/A

Not For Publication:

Vicinity:

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended,

I hereby certify that this X nomination request for determination of eligibility meets the documentation standards for registering properties in the National Register of Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60.

In my opinion, the property X meets does not meet the National Register Criteria. I recommend that this property be considered significant at the following level(s) of significance:

X national statewide local

Applicable National Register Criteria:

X A B X C D

<p style="font-size: 1.2em; font-family: cursive;">Robert A. Nelson, Deputy FPO</p> <hr/> <p>Signature of certifying official/Title: <u>National Park Service</u></p>	<p style="font-size: 1.2em; font-family: cursive;">May 8, 2014</p> <hr/> <p>Date</p>
<p>State or Federal agency/bureau or Tribal Government</p>	

Red Lodge – Cooke City Approach Road
Historic District

Park and Carbon
Counties, MT and Park
County, WY
County and State

Name of Property

In my opinion, the property X meets ___ does not meet the National Register criteria.

Signature of commenting official:

Date

Title :

State or Federal agency/bureau
or Tribal Government

4. National Park Service Certification

I hereby certify that this property is:

- entered in the National Register
- determined eligible for the National Register
- determined not eligible for the National Register
- removed from the National Register
- other (explain:)

Signature of the Keeper

Date of Action

5. Classification

Ownership of Property

(Check as many boxes as apply.)

- Private:
- Public – Local
- Public – State
- Public – Federal

Category of Property

(Check only one box.)

- Building(s)
- District
- Site

Red Lodge – Cooke City Approach Road
Historic District

Park and Carbon
Counties, MT and Park
County, WY
County and State

Name of Property

Structure

Object

Number of Resources within Property

(Do not include previously listed resources in the count)

Contributing	Noncontributing	
<u>0</u>	<u>2</u>	buildings
<u>9</u>	<u>7</u>	sites
<u>6</u>	<u>11</u>	structures
<u> </u>	<u> </u>	objects
<u>15</u>	<u>20</u>	Total

Number of contributing resources previously listed in the National Register NONE

6. Function or Use

Historic Functions

(Enter categories from instructions.)

Transportation/road related

Recreation and culture/outdoor recreation

Current Functions

(Enter categories from instructions.)

Transportation/road related

Recreation and culture/outdoor recreation

Red Lodge – Cooke City Approach Road
Historic District

Park and Carbon
Counties, MT and Park
County, WY
County and State

Name of Property

7. Description

Architectural Classification

(Enter categories from instructions.)

OTHER: National Park Service Rustic

Materials: (enter categories from instructions.)

Principal exterior materials of the property: STONE AND CONCRETE

Narrative Description

(Describe the historic and current physical appearance and condition of the property. Describe contributing and noncontributing resources if applicable. Begin with a **summary paragraph** that briefly describes the general characteristics of the property, such as its location, type, style, method of construction, setting, size, and significant features. Indicate whether the property has historic integrity.)

Summary Paragraph

The Red Lodge – Cooke City Approach Road Historic District, commonly referred to as the Beartooth Highway, is a 60-mile-long linear transportation corridor that links Yellowstone National Parks' Northeast Entrance Station NHL with the Rock Creek drainage, south of the community of Red Lodge, Montana. The style of the road is considered to be Park Service Rustic because of the use of natural local materials to construct the road and because it lies lightly on the landscape with as little disturbance to the terrain as possible. The road traverses portions of the Absaroka Beartooth wilderness and provides vehicular access to the 11,000-foot high plateau and its spectacular views. Attaining this high elevation is a marvel of early road engineering and is possible through the use of switchback -- tight curves that reverse the direction of the road as it traverses up the mountainous terrain. The road was constructed during the Great Depression when road building was transitioning from horse-drawn to motorized construction equipment and constructed in a challenging landscape with a bitterly cold climate. The most significant feature is the scenic values of the road corridor. The road is literally carved out of the sides of the mountains. The high plateaus over which the road traverses are incised by

Red Lodge – Cooke City Approach Road
Historic District

Park and Carbon
Counties, MT and Park
County, WY
County and State

Name of Property

deep glacially carved U-shaped valleys which provide sweeping views of glacially sculpted topography with access to high mountain lakes, rivers, and streams as well as a unique and complex high altitude vegetative mosaic. Although there have been some changes to the road structure, the road corridor remains substantially unchanged since the historical period and continues to contribute to the integrity of the historic district.

Narrative Description

SEE CONTINUATION SHEETS

8. Statement of Significance

Applicable National Register Criteria

(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)

- A. Property is associated with events that have made a significant contribution to the broad patterns of our history.
- B. Property is associated with the lives of persons significant in our past.
- C. Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction.
- D. Property has yielded, or is likely to yield, information important in prehistory or history.

Criteria Considerations

(Mark "x" in all the boxes that apply.)

- A. Owned by a religious institution or used for religious purposes
-

Red Lodge – Cooke City Approach Road
Historic District

Park and Carbon
Counties, MT and Park
County, WY
County and State

Name of Property

- B. Removed from its original location
- C. A birthplace or grave
- D. A cemetery
- E. A reconstructed building, object, or structure
- F. A commemorative property
- G. Less than 50 years old or achieving significance within the past 50 years

Areas of Significance
(Enter categories from instructions.)

**Transportation: Entertainment/Recreation
Engineering** _____

Period of Significance

1931 – 1938 _____

Significant Dates

1931 – Passage of the Park Approaches Act

1932 – Executive Order withdrawing lands within 250 feet of the highway centerline for roadway use

1936 – Official opening of the road to public travel

Significant Person

(Complete only if Criterion B is marked above.)

Red Lodge – Cooke City Approach Road
Historic District

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County, WY
County and State

Name of Property

Cultural Affiliation

N/A

Architect/Builder

**Bureau of Public Roads
National Park Service Landscape Division**

Statement of Significance Summary Paragraph (Provide a summary paragraph that includes level of significance, applicable criteria, justification for the period of significance, and any applicable criteria considerations.)

The Red Lodge-Cooke City Approach Road Historic District qualifies for listing in the National Register of Historic Places as nationally significant under Criteria A and C. Under Criterion A, areas of significance include “transportation,” and “recreation.” Under Criterion C, the relevant area of significance is “engineering.” Under Criterion A, the road is an excellent example of the cooperative relationship between the Bureau of Public Roads (BPR)¹, precursor to the Federal Highway Administration, and federal land managing agencies such as the National Park Service and the U.S. Forest Service. The road was the first and most substantial to be constructed under the Park Approaches Act, passed in 1931. Its completion opened new territory for purposes of recreational development and substantially increased tourism in Yellowstone National Park and the region. Its presence facilitated the development of outdoor recreational facilities such as campgrounds, cabin lease sites and trailheads on adjacent forest service lands, and furthered the use of these areas by private individuals traveling in their own vehicles.

Under Criterion C, aspects of the road’s engineering give the Red Lodge-Cooke City Approach Road national significance. The road is one of the highest elevation roads in the United States at 10,947 feet above sea level. The location of the 60-mile road in a remote wilderness, where transport of road builders, their machinery, and materials was logistically very challenging, created circumstances that challenged traditional road-building methodology. The alpine tundra biome through which the road passes is dominated by massive glacially swept Precambrian rock with little soils and sediments to incorporate into the road bed. The large scale massive systems inhibited road construction and cold windy conditions and short construction seasons were hard on the workers, the animals, and the machinery. Steam shovels and other mechanical equipment were not as efficient at that altitude or temperatures slowing

¹ Note that in 1939 the BPR was renamed the Public Roads Administration (PRA) and placed under the auspices of the Federal Works Agency. In 1949, the PRA was transferred to the Department of Commerce. In 1967, it was again transferred to the Department of Transportation and renamed the Federal Highway Administration.

Red Lodge – Cooke City Approach Road
Historic District

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County, WY
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Name of Property

down progress. Excavated material froze in the hours between excavation and placement on the road base and therefore was difficult to compact. Caterpillars pulling “rippers” had to constantly work the excavated material to keep it usable. It was necessary to keep a crew working at night to keep equipment and construction materials from freezing solid. The tents housing equipment repairs operations often caught on fire and repairmen often experienced frost bitten fingers.

The Red Lodge-Cooke City Approach Road was built during the time when various mechanized machines were first being introduced to the road building industry. Skilled operators, talented repair mechanics, and replacement parts for these newly invented machines were not abundant, nor were the machines themselves. Built during the Great Depression, few construction companies could afford the high priced machines or the cost of the construction bonds. But the desire to provide jobs for their workers and pride in completing the project under dire conditions, and often at an economic loss was strong

Comparatively, built about the same time, the Going-To-The-Sun Road in Glacier National Park is a National Historic Landmark. The 53-miles of road climbs to 6,600-feet above sea level at its highest with few switchbacks. The Trail Ridge Road in Rocky Mountain National Park, completed in the early 1930s is 37.9 miles long and 12,183 feet at its' highest. Like the Red Lodge-Cooke City Approach Road, the Trail Ridge Road is an All American Road and one of America's Byways. It was listed on the National Register of Historic Places in 1984, significant for engineering at the national, state, and local levels. The Trail Ridge Road construction had easier access to materials and equipment due to its proximity to Denver and rail service and a portion of the road corridor was previously constructed by convict labor. The Mount Evans Road in Colorado is a 15-mile one-way scenic drive finished in 1930 reaching an altitude of 12,000 feet. Its bridges historic district is listed on the National Register.

The recommended period of significance for the district is 1931 to 1938. This period includes the primary construction events, when private contractors completed grading and surfacing work that resulted in the official opening of the road to public traffic in 1936. It also includes the period referred to by the BPR and the National Park Service as the “post-construction” period, a two-year period during which Yellowstone National Park would be responsible for providing funding for finishing tasks, such as rounding and flattening cut slopes, placing signs, minor widening, and improving the grade through poorly constructed sections. Although the road continued to serve as the primary transportation link between Red Lodge and Cooke City well into the historical period, its primary contribution dates to between 1931 and 1938, when it effectively opened vehicular access to the recreational potential of the formerly remote Beartooth Plateau, created a new entrance to the park, and started the communities of Red Lodge and Cooke City, Montana on their path to tourism-based economies.

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Narrative Statement of Significance (Provide at least **one** paragraph for each area of significance.)

SEE CONTINUATION SHEETS

9. Major Bibliographical References

Bibliography (Cite the books, articles, and other sources used in preparing this form.)

SEE CONTINUATION SHEETS

Previous documentation on file (NPS):

- preliminary determination of individual listing (36 CFR 67) has been requested
- previously listed in the National Register
- previously determined eligible by the National Register
- designated a National Historic Landmark
- recorded by Historic American Buildings Survey # _____
- recorded by Historic American Engineering Record # _____
- recorded by Historic American Landscape Survey # _____

Primary location of additional data:

- State Historic Preservation Office
- Other State agency
- Federal agency
- Local government
- University
- Other
- Name of repository: _____

Historic Resources Survey Number (if assigned): _____

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Historic District

Park and Carbon
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County, WY
County and State

Name of Property

10. Geographical Data

Acreeage of Property 3253 Acres

Use either the UTM system or latitude/longitude coordinates

Latitude/Longitude Coordinates

Datum if other than WGS84: _____
(enter coordinates to 6 decimal places)

- | | |
|--------------|------------|
| 1. Latitude: | Longitude: |
| 2. Latitude: | Longitude: |
| 3. Latitude: | Longitude: |
| 4. Latitude: | Longitude: |

Or

UTM References

Datum (indicated on USGS map):

NAD 1927 or NAD 1983

- | | | |
|-------------|------------------|-------------------|
| 1. Zone: 12 | Easting: 578683 | Northing: 4983810 |
| 2. Zone: 12 | Easting: 582895 | Northing: 4985509 |
| 3. Zone: 12 | Easting: 589440 | Northing: 4984571 |
| 4. Zone: 12 | Easting : 594071 | Northing: 4978932 |

X SEE CONTINUATION SHEETS

Verbal Boundary Description (Describe the boundaries of the property.)

X SEE CONTINUATION SHEETS

Red Lodge – Cooke City Approach Road
Historic District

Park and Carbon
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County, WY
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Name of Property

Boundary Justification (Explain why the boundaries were selected.)

X SEE CONTINUATION SHEETS

11. Form Prepared By

Initial Draft Prepared in: September, 2005

By: Ian Smith, Research Historian; Carla Homstad, Associate Historian; Janene Caywood, Associate Archaeologist, Historical Research Associates, Inc. P.O. Box 7086, Missoula, MT 59807-7086, Phone: 406 721-1958

Revised and Updated In: August 21-23, 2012 through February 2014

By: Elaine Skinner Hale, RPA, Archeologist, Yellowstone National Park, P.O. Box 168, Yellowstone National Park, Wyoming 82190 Phone 307 344-2156 and:

Nancy Weidel, Architectural Historian, Richard Collier, Photographer, Ross Hilman, GIS Specialist and Archaeologist, Wyoming State Historic Preservation Office, 2301 Central Avenue, Barrett Building, Third Floor, Cheyenne, Wyoming 82002 Phone: 307 777-7697

Additional Documentation

Submit the following items with the completed form:

- **Maps:** A USGS map or equivalent (7.5 or 15 minute series) indicating the property's location.
- **Sketch map** for historic districts and properties having large acreage or numerous resources. Key all photographs to this map.
- **Additional items:** (Check with the SHPO, TPO, or FPO for any additional items.)
- **PROPERTY OWNER**

LANDS LYING WITHIN 250-FOOT ON EACH SIDE OF CENTER LINE OF THE COOKE – RED LODGE APPROACH ROAD WERE WITHDRAWN FROM SETTLEMENT, LOCATION, SALE, ENTRY, OR OTHER DISPOSAL AND RESERVED AS THE COOKE-RED LODGE APPROACH ROAD BY EXECUTIVE ORDER OF HERBERT HOOVER, NOVEMBER 16, 1932. THIS ORDER SHALL

Red Lodge – Cooke City Approach Road
Historic District

Park and Carbon
Counties, MT and Park
County, WY
County and State

Name of Property

**CONTINUE IN FULL FORCE AND EFFECT UNLESS AND UNTIL REVOKED BY
THE PRESIDENT OR BY ACT OF CONGRESS.**

Photographs

Submit clear and descriptive photographs. The size of each image must be 1600x1200 pixels (minimum), 3000x2000 preferred, at 300 ppi (pixels per inch) or larger. Key all photographs to the sketch map. Each photograph must be numbered and that number must correspond to the photograph number on the photo log. For simplicity, the name of the photographer, photo date, etc. may be listed once on the photograph log and doesn't need to be labeled on every photograph.

Photo Log

Name of Property: **Red Lodge – Cooke City Approach Road Historic District**

City or Vicinity:

County: **Carbon and Park Counties, Montana and Park County, Wyoming**

Photographer: **All Photographs Taken in Large Format by Richard Collier, Wyoming State Historic Preservation Office Photographer**

Date Photographed: **All Photographs Taken August 21, 22, and 23, 2012**

Description of Photograph(s) and number, include description of view indicating direction of camera:

1 of __. **X SEE CONTINUATION SHEETS**

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C.460 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 100 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Office of Planning and Performance Management, U.S. Dept. of the Interior, 1849 C. Street, NW, Washington, DC.

**United States Department of the Interior
National Park Service****NATIONAL REGISTER OF HISTORIC PLACES
Continuation Sheet****Section Number: 7**
Park County, WY**Page 1 Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT and****Section 7. Narrative Description, continued:**

The Red Lodge-Cooke City Approach Road Historic District, commonly referred to as the Beartooth Highway², is a roughly 60-mile-long linear transportation corridor that links Yellowstone National Park's Northeast Entrance Station with the Rock Creek drainage, south of the community of Red Lodge. Along most of this distance, the width of the corridor varies between 500 and 100 feet. (See continuation pages.)

Located in the Northern Rocky Mountains Physiographic Province, the road traverses portions of the Absaroka and Beartooth mountains, both components of the Beartooth Uplift, an expansive geological uplift that covers an area roughly 75 miles long by 40 miles wide in south-central Montana and northwest Wyoming.^{a3}

From its beginning at the north boundary of Yellowstone National Park, at an elevation of 7,350 feet above sea level, the road extends eastward along the north bank of Soda Butte Creek, a westward-flowing tributary of the Yellowstone River. Over the next 7.4 miles the road ascends gradually to Colter Pass, which lies at an elevation of 8,060 feet. East of the pass the road drops into the drainage of the eastward-flowing Clarks Fork River. The road contours along the steep hill slopes above the south side of the river, descending roughly a thousand feet over several miles before achieving the river grade. The road parallels the Clarks Fork River for roughly 10 miles to milepost (MP) 17.4 where it begins its long, 19-mile-long ascent out of the valley to the top of the Beartooth Plateau, and to Beartooth Pass—the highest point of the road at an elevation of 10,947 feet, and nearly 37 miles from the park entrance station.⁴ From Beartooth Pass eastward the road traverses the top of the plateau for another 8 miles, where it begins a precipitous descent into the bottom of the Rock Creek drainage, at an elevation of about 6,800 feet.

For the majority of its length, the road traverses federal lands administered by the U.S. Forest Service. Three national forests, the Gallatin and the Custer in Montana, and the Shoshone in Wyoming, share responsibilities for federal lands along the road corridor, which are managed principally for their recreational value. Numerous forest service campgrounds and trailheads are accessed via the road. The Absaroka-

² During the construction period official government documents refer to the road as the "Red Lodge-Cooke City Approach Road to Yellowstone National Park." In most common usage, however, the last four words were eliminated, and many referred to the road as the Red Lodge-Cooke City Approach Road, sometimes shortened to the Red Lodge-Cooke City Highway. Over the years, various other names have been proposed for the road. Soon after its completion, the residents of Cooke City suggested naming it the "Shelley Highway Skyway," or "Shelley Skyway," in order to honor the efforts of O.H.P. Shelley—a prominent Red Lodge booster who lobbied Congress for money to build the road. This proposal was not adopted, however, and various public and private entities continued to refer to the road by variations on the aforementioned themes. In 1938, the Northern Pacific Railroad referred to the road as the Red Lodge HIGHroad to Yellowstone Park," in its promotional brochures. For a time local newspapers adopted the appellation, sometimes shortening it to the "HIGHroad." By the 1960s, the Forest Service, the National Park Service, and the Federal Highway Administration all referred to the road as the Beartooth Highway. In response, the Red Lodge Chamber of Commerce declared its intention to use "Beartooth Highway" in all printed tourist-related materials. Although it took some time for all entities to assume the same name in referencing the roadway, by 1970 most agency representatives and individuals were calling the road the "Beartooth Highway." The recent 2002 listing of the road as a component of the All American Road program identifies the road as the Beartooth Highway. Bruce H. Blevins provides a summary of road names in his *Beartooth Highway Experiences* (Powell, Wyoming: WIM Marketing, 2003), 47-49.

³ From the park entrance station the first 8.4 miles of the highway are in Park County, Montana. The next 34.7 miles are in Park County, Wyoming, and the final 15 miles are in Carbon County, Montana.

⁴ All milepost (MP) references are taken from the report entitled, *Beartooth Highway Road Inventory and Needs Study, Mile Post 0.0 to Mile Post 68.7*, prepared by Western Federal Lands Highway Division (Vancouver, Washington: 1994).

**United States Department of the Interior
National Park Service****NATIONAL REGISTER OF HISTORIC PLACES
Continuation Sheet**Section Number: 7
Park County, WY

Page 2 Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT and

Beartooth Wilderness is north and west of the road along the length of its corridor, while the North Absaroka Wilderness is south of the road at its west end. Exceptions to federal ownership include lands within and adjacent to the communities of Silver Gate and Cooke City (considered “gateway communities” near the park entrance) and a few small-scale commercial establishments located on privately patented or leased federal land adjacent to the road.

The Red Lodge-Cooke City Approach Road Historic District is composed of a variety of cultural landscape features that contribute to its eligibility. For this reason, the following detailed narrative description is presented within the context of the cultural landscape characteristics⁵ that are specifically relevant to the property. These include: “*natural systems and features*,” “*land use*,” “*spatial organization*,” “*circulation*,” “*buildings and structures*,” “*views and vistas*,” and “*small-scale features*.” [A table summarizing the count for contributing and noncontributing resource is included at the end of Section 7.]

Natural Systems and Features

The natural systems and features of the Beartooth Mountains form the setting for the historic district and largely define the scenic values of the corridor. These systems also influenced the finished character of the Red Lodge – Cooke City approach road, both in terms of the environmental limitations imposed by the systems, and in the raw construction materials available within the corridor. Sweeping views of mountain scenery incorporate glacially sculpted topography and hydrological systems and a complex vegetative mosaic, which varies according to elevation and aspect. The mountains are part of the larger Beartooth uplift, a roughly rectangular massif, 40 by 75 miles in size, and the highest in the mid-Rocky Mountain region.⁶ The uplift consists of three separate blocks; the North Snowy block, the South Snowy block, and the Beartooth block, which contains the Beartooth Mountains.⁷ The initial period of uplifting occurred between 80 and 55 million years ago, when movement in the earth’s tectonic plates caused the Beartooth uplift to rise above the surrounding plain. Diastrophic movement continued until roughly 2 million years ago, during which time the Beartooth block continued to rise above the North and South Snowy blocks along its major fault lines. The Clarks Fork River, which flows along the southwestern base of the Beartooth block, marks one of these faults and forms a part of the boundary between the Beartooth Mountains and the Absaroka Range.

In the north part of the range the Beartooth Mountains are characterized by extremely rugged terrain with glacially sculpted peaks that range in elevation from 5,500 feet above sea level near the Stillwater River at the range’s northern margin, to 12,799 feet at the top of Granite Peak, the highest point in Montana. In contrast, the southeastern part of the mountains, the portion traversed by the approach road, is characterized by a series of high tablelands, the surfaces of which lie at elevations of between 10,000 and 11,000 feet. The plateaus are incised at the eastern and southern edges by deep, glacially carved U-shaped valleys, one of the effects of the ice cap that covered much of the Beartooth block during the Pleistocene Epoch, between 1.6 million and 12,000

⁵ As defined in the 1998 *Cultural Landscape Inventory Professional Procedures Guide*, U.S. Department of the Interior, Washington D. C.

⁶ The towns of Gardiner, Livingston and Red Lodge, Montana, mark three corners of the uplift. H. L. James, *Geologic and Historic Guide to the Beartooth Highway, Montana and Wyoming*, Special Publication 110, Montana Bureau of Mines and Geology (Butte, Montana: 1995).

⁷ James, *Geologic and Historic Guide to the Beartooth Highway*.

**United States Department of the Interior
National Park Service****NATIONAL REGISTER OF HISTORIC PLACES
Continuation Sheet****Section Number: 7
Park County, WY****Page 3 Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT and**

years ago.⁸ Pressure from the accumulated weight of the ice fields forced ice to flow down the sides of the plateau through previously existing faults and drainages, creating the deep valleys that drain the south and east slopes of the mountains, including Rock Creek and the Clarks Fork River. The surfaces of the plateaus themselves appear to have escaped the effects of glacial scouring. Glaciation is evident, however, in adjacent, lower areas, including a large area along the southwestern flank of the mountains, where numerous lakes occupy depressions gouged by glaciers moving across the bedrock surface.

Most glacial features observed in the Yellowstone and Beartooth areas formed during two main glacial episodes. The oldest, the Bull Lake, was initiated 150,000 years ago. The second, the Pinedale Advance, occurred during two main periods; 47,000 – 34,000 years ago and 22,000 – 19,000 years ago.

With the exception of two areas where younger sedimentary formations occur, the rocks exposed along the Beartooth Highway are pre-Cambrian in age. Regionally the pre-Cambrian rocks range in age from 1.7 to 3.1 billion years in age. The pre-Cambrian terrain consists of metamorphic rocks such as gneiss and schist. These rocks, originally sedimentary and igneous in origin, were deeply buried and subsequently subjected to high temperatures and pressures which transformed them into different rock types.

One of the two aforementioned areas along the Beartooth Highway where younger sedimentary and igneous rocks predominate is located between the town of Silver Gate and the Wyoming-Montana boundary, a linear distance of approximately 8.4 miles. In this area, sediment outcrops of Cambrian and Devonian age are interspersed with volcanic rock exposures. The Cambrian Period occurred 560 to 505 million years ago. The Devonian Period extended from 410 to 360 million years before present. Both the Cambrian and Devonian sediments formed in a marine environment and both contain layers of limestone, dolomite, shale, and sandstone. Most of the volcanic rocks exposed in the subject area formed as andesite and basalt lava flows, 50 – 40 million years ago during the Eocene Period. However younger lava flows also occurred in the Yellowstone Park area, for example, during the Miocene Period 17 million years ago and the Pliocene period 5.5 million years ago and also during the Pleistocene. The large volcanic caldera (depression) that occupies much of Yellowstone National Park, formed as a result of three major volcanic eruptions and subsequent caldera forming collapses of the earth's surface, took place 2.0, 1.3, and 0.6 million years ago.

The second area along the Beartooth Highway that displays younger sediment atop pre-Cambrian rock lies approximately 24 linear miles east of Cooke City in the vicinity of Beartooth Lake. The lake, of glacial origin, is bordered on the north by Beartooth Butte, a 1600 foot, isolated topographic feature that is oriented north-south and is approximately 2.4 miles long and 1.6 miles wide. Beartooth Butte is underlain by sedimentary rock that formed intermittently within a marine environment, over a time span that extended from 560 to 320 million years ago (Cambrian, Ordovician, Devonian, and Mississippian Periods.) This sedimentary sequence at one time covered most of the Beartooth mountain crest, but most of it has been removed by erosion and only a few remnants, like Beartooth Butte, remain⁹

In contrast to the Beartooth Mountains, the rock in the Clarks Fork Yellowstone River valley and the Absaroka Mountains south and west of the road corridor consists principally of much younger sedimentary and

⁸ In the area west and south of the community of Red Lodge, the various lobes of the incised plateau bear the names Hell Roaring, Line Creek, Red Lodge Creek, and Silver Run Plateaus.

⁹ John Albanese, Consulting Geochronologist, Wy. NR Review Committee, written communications, Oct. 2008.

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volcanic rock. Sedimentary rock deposited between 500 and 50 million years ago remains superimposed over the basement rock, which is not visible on the surface. The same sedimentary formations exposed in Beartooth Butte, are found at lower elevations in the peaks in the Absaroka Mountains.¹⁰ In the Absarokas, the sedimentary rock is overlain by various formations collectively known as the Absaroka Volcanic Supergroup, deposited between 55 and 35 million years ago when eruptions from resurgent calderas blanketed the area with lava flows and pyroclastic debris thousands of feet thick. Rock formations from this period are found at the highest elevations within the Absaroka Mountains including Pilot and Index peaks, which dominate the horizon in the western part of the road corridor. Like the Beartooth Mountains, however, glacially carved topographic landforms, including horns, arêtes, and U-shaped valleys, dominate the landscape.

The Beartooth Mountains provide a world-class geologic occurrence of ancient rocks of the earth – Precambrian Era formations that are the subject of much study by several geomorphology and geology institutes and geology field stations beginning in the 1930s with Princeton University and continuing to the present day. Access to these camps, institutes, and the geologic formations themselves is greatly facilitated by the Red Lodge-Cooke City Approach Road, more often referred to by geologists as the “Beartooth Highway”.

The character of native vegetation communities found throughout the road corridor reflects variables such as elevation, aspect, and hydrology. The road transects areas of dense coniferous forests, mixed sagebrush grasslands, and alpine tundra. The climax forest type in the drainage basins at the east and west ends of the corridor contains mixed stands of subalpine fir (*Abies lasiocarpa*), Douglas fir (*Pseudotsuga mensiesii*) and Englemann spruce (*Picea englemanni*), with fir predominating. The riparian zones adjacent to small stream courses typically contain willows and alder. In many areas, high subsurface moisture levels result in extensive wetlands in areas adjacent to the actual stream course.

The broader drainage of the Clarks Fork Yellowstone River contains a more diverse riparian zone, including stands of cottonwood and aspen on adjacent terraces. Mixed stands of sagebrush and bunchgrasses occur on the terraces above the river and on the lower, south-facing hill slopes above the river. In these areas, stands of aspen occur in wetter locations, such as near seeps or springs. Even-aged stands of lodgepole pine (*Pinus contorta*) also occur on the hill slopes above the drainage course.

At elevations near timberline (between 9,000 and 10,000 feet) whitebark pine (*Pinus albicaulis*) occurs in stands mixed with subalpine fir. The harsh climatic conditions, which include snow-cover for the majority of the year, and year-round high winds, affect the growth of trees at these elevations, producing stunted and contorted trunks. Extensive willow wetlands are abundant adjacent to the edges, inlets, and outlets of the glacially carved lakes near timberline west of the plateaus.

Above timberline, alpine tundra occurs on the non-glaciated portions of the named plateaus. The tundra biome, which derives its name from a Finnish word meaning land of no trees, consists of a mosaic of over 400 species of alpine grasses, sedges, herbs and dwarf shrubs, growing in a patchwork of meadows, grasslands,

¹⁰ A notable example is the Pilgrim Limestone, which occurs as a clearly distinguishable band of cliffs along the flank of the mountains that rise above the Clarks Fork Yellowstone River.

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shrubby wetlands and fell-fields.¹¹ The fell-fields are distinct from the remainder in the overall lack of vegetation, except in the interstices between the rock, where sufficient soil development occurs to support hardy plants.

Fens, a type of wetland, are found in low-lying poorly drained areas throughout the corridor and consist of a wide variety of sedges and other aquatic plants. Most of the fens began forming 10,000 years ago following glacial melting.¹² In some locations, decomposition of vegetative matter has produced deep peat beds, some with hummocky surfaces created by frost heaving.

Summary: The large-scale natural systems that influenced road construction and subsequent use are virtually unchanged since the historical period; they continue to contribute to the integrity of setting of the historic district.

Land Use

Current land uses within the historic district largely mirror those of the historical period. Some historical uses have become obsolete, while others have intensified. Vehicular transportation remains the predominant use within the district and has intensified within the nearly 75 years since the official opening of the road. Associated but secondary uses include road maintenance and maintenance worker housing. The principal site related to road maintenance is the National Park Service's Beartooth Road Camp, documented as site 48PA2510.¹³ This facility, originally in the vicinity or part of the 1931-32 McNutt & Pyle road construction camp at Muddy Creek, was refurbished for road maintenance by the Bureau of Public Roads prior to 1940. The camp presently consists of a collection of log and frame buildings, built in 1925 by park concessionaires as cabins, a Civilian Conservation Corp (CCC) Mess Hall and a CCC Bunkhouse from the 1930s, relocated by Yellowstone National Park in 1949 to the Beartooth Road Camp. Along with a new generator shed and a trailer house, these buildings are used to shelter the activities of park maintenance personnel assigned to the camp. The park operates the road camp under a Special Use Permit from the Shoshone National Forest, which it inherited from the Public Roads Administration. Although some of the buildings at the site may be eligible as a separate historic district for listing in the National Register under Criterion A, the dates of construction of the buildings currently present do not match the period of significance for the road Historic District. The Beartooth Road Camp has been documented and photographed for future NR consideration. Both Montana and Wyoming National Register Review Committees suggested that as research is added to this NR Nomination to expand the context of access to various types of recreation opportunities, the period of significance for the road Historic District could be expanded to include the maintenance activities at the Road Camp. Therefore, the road camp is being included within the boundary of the Red Lodge-Cooke City Approach Road Historic District (HD) but it is not considered a contributing feature of the HD at this time.

¹¹ ERO Resources Corporation, *Wetlands, Waters of the U.S., and Riparian Areas. Portions of U.S. 212 (FH 4), The Beartooth Highway, Park County, Wyoming, and Park County, Montana*. Report prepared for Federal Highway Administration-Central Federal Lands Highway Division, Lakewood, Colorado, 2001, pp. 9-15.

¹² Ibid.

¹³ David G. Killam, *Cultural Resources Survey Report of Proposed Workcamp Locations and Proposed Interpretive Site, Addendum to Cultural Resources Survey Report Wyoming Forest Highway (FH) 4, Beartooth Highway, Park County, Wyoming*, Report prepared by RMC Consultants, Lakewood, Colorado, for ERO Resources Corporation, 2002.

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Some historical land uses, such as housing construction workers involved with initial road construction, and the development and use of borrow areas for construction purposes, became obsolete with the completion of the various road sections. Although the original contract specifications called for reclamation of construction campsites and borrow areas, evidence of both can still be found within and adjacent to the road corridor, especially in areas not directly visible from the roadway. Seven historical borrow areas have been identified along the road corridor. One of these, the Pilot Creek gravel pit (located at MP 12.5), was expanded during a post-historic reconstruction project, while another has been rehabilitated for use as a forest service trailhead. Neither of these appears as it did during the historical period and both are counted as noncontributing sites. The others appear as they did after completion of construction, with some containing associated trash scatters, and are counted as contributing sites. Some of the original borrow areas along the higher switchback segments of the road illustrate the limited space from which the construction crews had to provide fill material necessary to construct the road. In some instances, they were retrieving fill at the very edges of deeply carved glacial valleys; in other instances they shaved off rock faces to provide fill for the road to pass under the rock precipice. The borrow pits identified as contributing to the road historic district help illustrate the story of high altitude road construction during the 1930s. The corridor also includes gravel sources used exclusively during post-historic period projects, which are counted as noncontributing resources.

In addition to the borrow areas, at least one construction camp, the McNutt and Pyle camp at Long Lake used during the 1932 and 1933 construction seasons, has been documented as site 48PA2304. Located at the west end of Long Lake, the site consists of an artifact scatter including metal, glass, and ceramic fragments.¹⁴ Another smaller campsite, recorded as 48PA2303 is located nearby. The McNutt and Pyle camps at Long Lake contain remnants of both camp life and also the work that was performed for the construction in the area. The road system into and around Camp 48PA2304 and the piles of masonry debris from shaping the stone used for the nearby bridges indicate a variety of activities taking place. Within the context of the HD, they mark the location of former activity areas and can be counted as contributing sites.

Another resource associated with road construction is the remains of the Hi-Line Trail, the wagon road that predated the highway. The McNutt and Pyle Construction Company used the trail as a “tote road,” to haul its employees and equipment the roughly 30 miles between Cooke City and the west end of its construction section on the west slope and top of the Beartooth Plateau. Segments of the trail, which appear as a leveled area, or as a single or two parallel tracks, are visible between mileposts 28 and 32. Segments of the Hi-Line Trail have been recorded as site 48PA2311. The portions of the historic and likely prehistoric Hi-Line Trail that are within the Red-Lodge to Cooke City Approach Road Historic District, or within view from the HD are significant examples of the auxiliary wagon and pack roads needed to get the equipment, supplies, and labor to this high altitude construction area. Although carved into the terrain in some places, the Hi-Line Trail tote road is minimal in construction design, materials and workmanship but it is of great value to this HD in understanding the setting—the physical environment in which the modern road was constructed; the tote road/trail segments retain integrity of feeling conveying a historic sense of the difficulties of constructing this road at that period of

¹⁴ Note that the main Morrison-Knudsen camp, located in the Rock Creek drainage at the east end of the road, has been rehabilitated as a public campground, currently part of the Custer National Forest. Although located on public land, it lies outside the 500-foot-wide district boundary.

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time; and they provide an association between the building of the road and the people, animals and machines that built it. Within the context of the HD, they can be counted as contributing resources.¹⁵

Once a remote and generally inaccessible wilderness area, the construction of the Red Lodge to Cooke City Approach Road (aka Beartooth Highway) has opened up the area to a variety of recreational activities and today is one of the most visited wilderness areas in the United States, although visitor use of the area is generally limited to July 15 to September 15, when the trails and campgrounds are snow-free. Seven formal campgrounds and many individual camping opportunities are accessed from the roadway. Numerous “4-wheeling” roads into old mining claims and other forest areas are available for general use. Over 16 formally maintained backcountry trails exist and the area boasts 944 lakes and nine major drainages making it an angler’s paradise. There are several “Dude Ranches” in the area for horseback trail rides and the Clay Butte Fire Tower is open to the public. Over the last 50 years the Beartooth Highway has become a favored passage for the ever growing number of motorcycle riders.

Summary: Although some historical land uses within the road corridor have intensified, for the most part, these uses still predominate. This continuity of use has contributed to the integrity of the historic district. Evidence of obsolete historical uses associated, such as temporary construction campsites and excavated borrow areas also remain visible, usually adjacent to and outside the road corridor.

Spatial Organization

In areas where the road traverses federal lands, the larger public facilities (like campgrounds) occur outside the road corridor, in areas screened from the road by either topography or vegetation. This is a historical pattern, initiated during the initial construction of the road, the intent of which was the preservation of the viewshed along the road corridor. Secondly, the separation of through-traffic from areas of concentrated public use represents an attempt to eliminate potential vehicle-pedestrian conflicts. Generally, the only indication of the presence of public and administrative facilities within the road corridor are the signs and approach roads that mark their entrances.

An exception to this is the Top of the World Store, which was moved from its original location near Beartooth Lake to its current location in the 1960s.¹⁶ Located at MP 28.33, this commercial establishment stands out in an area otherwise devoid of development and inside the easement. In a departure from historical patterns, neither topography nor vegetation shield these modern improvements from the road corridor. The Top of the World Store is counted as a non-contributing resource.

Summary: The organization of improvements within and adjacent to the road corridor has not been significantly modified since the period of significance, i.e., facilities associated with the through-road continue to be spatially distinct from special-purpose facilities.

¹⁵ David G. Killam, Melissa L. Taylor and Ted Hoefler III, *Final Cultural Resources Survey Report, Portions of U.S. 212, The Beartooth Highway, Park County, Wyoming*, Cultural Resources Report No. 47. Report prepared by Foothill Engineering Consultants, Inc., Lakewood, Colorado, for ERO Resources Corporation, 1999.

¹⁶ *Ibid.* Killam et al. recorded the Top of the World Store in 1998. They recommended that it be considered ineligible for listing due to a loss of integrity, notably integrity of materials, design, location and setting. The Wyoming SHPO concurred with the recommendation.

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Circulation

The principal resource within the historic district is the road itself.¹⁷ When judged against its appearance after the completion of post-construction work in 1938, the character and historic integrity of the existing road prism varies across its 60-mile length. Major engineering upgrades to discrete segments of the road occurred in the 1960s, 1970s and 1990s. These upgrades, in addition to the incremental widening of the grade produced by routine maintenance, and site-specific maintenance strategies, are reflected in the road's current character. In the following text the various road segments are described in terms of alignment, width, grade, and edge treatment—as compared with the original. During the historical period, the approach road proper was divided into four “sections” designated A, B, C and D (see additional documentation, page 82-83.) When evaluating the condition and engineering needs for the road in 1993, the Federal Highway Administration divided it into seven, numbered “segments,” beginning with segment one at the west end of the road (see additional documentation, page 84.) The historic district includes Segments 1 through 5; Segments 6 and 7 are located entirely outside the district boundary. The road from Red Lodge runs mainly along the Rock Creek valley bottom and does not start gaining significant altitude until it reaches the north east end of Segment 5 at the 60 mile post marker. Segments 6 and 7 of the road have previously been repaired and improved more than the high altitude segments of the Red Lodge to Cooke City Approach Road. The reason they are not included in the Historic District is that the National Parks Approach Road legislation which finally passed Congress in 1931 limited the length of the road to 60 miles with no exceptions. The road from Red Lodge to the Northeast Entrance of YNP was 68.6 miles long. The Forest Service put the 8.6 miles of road from Red Lodge to Mile Marker 60 on the “Federal-Aid Primary Road System” and included the portion inside the forest boundary on the Forest Highway System. Segment 6 (4.2 miles) and Segment 7 (4.4 miles) were not built under the National Park Approach Road Program. The following description of the road uses the 1993 numbering system, because it reflects, in part, the current character of the road after the various improvement projects. Similarly, all milepost references reflect the distances between points as calculated in 1993.¹⁸

Segment 1: Segment 1 extends from the park boundary (MP 0) eastward to the western Montana/Wyoming state line (MP 8.4) and represents the west half of the original Section D. Along this segment, the road retains its original alignment. Between the park boundary and Silver Gate, between Silver Gate and Cooke City, and between Cooke City and the end of the segment, the width of the paved surface is roughly 32 feet, divided into two 12-foot driving lanes and 4-foot shoulders on each side of the road.¹⁹ Reconstruction of Segment 1 between the Yellowstone National Park East Entrance Station and MP 8.4 (east of Cooke City) began in 2007 and was completed in 2009. From 2004 through 2006 the section of Segment 1 from Cooke City to Wyoming was rehabilitated and reconstructed. This work represents the first phase of Western Federal Lands Highway Division's Montana Forest Highway Project PFH 59-1(1) & (2) through the Gallatin National Forest. This project widens the road along its existing alignment, and in some places horizontal and vertical curves were engineered for safer driving conditions resulting in some minor straightening and flattening of curves. The paved surface of the reconstructed road is 32 feet (2 12-foot driving lanes and 4-foot shoulders on each side of

¹⁷ Segment 4 of the approach road in Wyoming has been recorded as site 48PA2310. Killam et al., *Final Cultural Resources Survey Report Portions of U.S. 212, The Beartooth Highway, Park County, Wyoming*, The portion of the road located in Park County, Montana has been assigned Smithsonian number 24PA1255, and the portion of the road in Carbon County, Montana 24CB1964.

¹⁸ Western Federal Lands Highway Division, *Beartooth Highway Road Inventory and Needs Study*

¹⁹ The original width of the pavement was 18 feet, but was widened to 22 feet as the result of a 1939 surfacing project.

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the road) between the park boundary and Cooke City, 54 feet through Cooke City which includes a 24-foot driving surface (2 12-foot drive lanes) and 15-foot paved parking on both sides of the street, and 32 feet between Cooke City and the Montana-Wyoming state line. New guardrails and safety signage was installed. Also part of this project was the construction of a new interpretive site, with a paved parking area and several new sign panels. This new site, which is located just east of the park entrance, replaces the original interpretive sign just west of Cooke City.

The rehabilitation and reconstruction of Segment 1 of the Red Lodge to Cooke City Approach Road also included sub-excavation and installation of new drainage culverts and ditches to prevent damage to the road. From the Northeast Entrance of YNP to the small town of Silvergate the road passes through dense coniferous forests which thin a little as the road approaches Cooke City. Past Cooke City traveling east towards Colter Pass the uphill slopes were burned in the Fires of 1988 and still have little re-vegetation while the downhill forests remain dense. At Colter Pass the road again enters dense forested areas as it gains altitude from 7200 feet to 8000 feet. A Google Earth view of this segment of the road shows it on its' original alignment with no abandoned road segments.

There are three campgrounds located along Segment 1 and many steep roads leading to mining claims, mountain passes such as Daisy Pass and Lulu Pass, and numerous high mountain streams, rivers, and lakes. There are also several "Dude Ranches" located along on Segment 1. Although this segment of road does not include the breath-taking high mountain views and vistas as does much of the road, Segment 1 does provide visitor access to a wide range of camping, hiking, fishing, hunting, horse trails, four wheel trails, and other wilderness adventures that cannot be accessed as easily from the higher road segments.

Cut and fill slopes along the forest highway east of Cooke City were re-contoured and re-vegetated with native grasses and shrubs but in one area the steep cut side slopes have failed, sliding downhill towards and into the drainage ditch and onto the roadway. Generally, the condition of the road is good to excellent.

Segment 2: Segment 2 begins at MP 8.4 at the Montana/Wyoming state line and extends eastward through the Clarks Fork Yellowstone River valley to its intersection with Wyoming 296 (Chief Joseph Highway) at MP 17.4. This segment represents the east half of the original Section D and the west end of Section B. Five improvement projects, including reconstruction of the grade, bridge replacements, and paving, have been undertaken along this 9-mile stretch of road between 1963 and 1984, and 2009 through 2011. The result is a rehabilitated and reconstructed road, which meets current highway standards. The elements of the original design of the road that are retained are the location, most of the horizontal and vertical design of the road, the physical setting, the feeling of the aesthetic of the original road, and the association of this segment of road with the technically difficult and remote feeling of the high mountain historic road. The alignment has changed in several small areas and one significant area. The centerline of the road was shifted in two areas to avoid sharp curves, one at the entrance of a campground. The most significant alteration to the original alignment is a 2,000-foot section of road that formerly contoured into and out of the Gilbert Creek drainage in the vicinity of MP 16.3. In order to eliminate this sharp curve, engineers designed a large fill section to bridge the drainage. A culvert in the new section replaced the abandoned bridge. Although the bridge was removed, remnants of the stone abutments are still present. Reclamation of the abandoned road segments leading to the bridge appears to have been limited to the removal of the paving material. On the east side of the new fill section a designed pullout with a vegetated median and interpretive sign occupies the original road alignment; the current road passes to the north of the pullout.

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There are two campgrounds located on Segment 2 and several new pullouts to provide access to trails, fishing, and wildlife viewing. One pullout, opposite the entrance to the Crazy Creek Campground, provides trailhead parking and access to the Crazy Creek Trail as it passes into the head of the Clarks Fork Yellowstone River canyon. Several roads provide access to the timbered upper elevations.

The L Bar T Guest Ranch is located adjacent to the road along the Clarks Fork Yellowstone River valley where Gilbert Creek flows into the river. It is a large private in-holding in the wilderness area built in the 1920s prior to the construction of the road and was frequented by many notable guests including Ernest Hemmingway, who in the 1930s spent time there and wrote portions of three novels (The Green Hills of Africa; Death in the Afternoon; and To Have and Have Not). Originally adjacent to the L Bar T was the B-4 Ranch for Boys created by legendary hockey coach Vic Heyliger which provided the opportunity to spend 6 weeks at the ranch to many hundreds of boys. The Green Bay Packers football team was also associated with the B-4 ranch, which is now part of the L Bar T Ranch.

Along the remainder of the original alignment, the road grade has been reconstructed and paved to a width of 30 feet from MP 8.4 to MP 12.85 and to 32 feet between MP 12.85 and 17.4. Drainage ditches that run parallel to the road are generally unpaved. The maximum grade in this segment is 7.8 percent where the road pullout, opposite the entrance to the Crazy Creek Campground, provides trailhead parking and access to the Crazy Creek Trail. The road prism at the intersection of the Chief Joseph Scenic Highway (Route 296), a 47-mile road providing access to Cody, Wyoming, and the Beartooth Highway (Route 212), an All-American Road, has been widened significantly to allow a left and right turn lane onto the Beartooth Highway. Although steep, the terrain is largely open and un-forested at the east end of Segment 2.

Edge treatment through this entire section includes rounded slopes through the cuts; drill marks are visible on some rock faces, presumably a result of the reconstruction projects of the 1980s. Where present, safety railings are modern, consisting of wood posts with blocked-out W-beam Cor-Ten steel railings.

Segment 3: Segment 3 begins at MP 17.4 and extends eastward roughly 7 miles to MP 24.5. It represents part of the original Section B. From the junction of the approach road with the Chief Joseph Highway, the road begins ascending the western slope of the Beartooth Mountains. Between 1968 and 1977 five improvement projects, including reconstruction of the grade, bridge replacement, and paving were completed for this segment.

Although the majority of this segment remains on its original alignment, in four areas sharp curves have been eliminated through the creation of fill sections, similar to the one built through the Gilbert Creek drainage, or cuts. In two locations, across the Lake Creek drainage and across the Muddy Creek drainage, these realignments resulted in the abandonment of original bridges. The Lake Creek Bridge (48PA2509) and the road segments on either side of it are preserved in place, except for the original pavement surfacing. Erosion has destroyed a portion of the old road grade east of the bridge, but pedestrians continue to use the route, which is accessed from an unmarked pull-off on the south side of the newly aligned road and modern bridge. The Historic Lake Creek Bridge (48PA2509), now by-passed, has stone masonry abutments, a concrete bridge deck with a 25-ft driving surface and 2-foot shoulders to the rails, and metal picket-style railings. The bridge is very compact, sitting directly on the bedrock through which Lake Creek has carved its passage. Although unmarked and not visible from the current road, visitors find their way to the site and take advantage of walking along the bedrock up-stream for fantastic photographic opportunities. The modern Lake Creek bridge is a steel girder

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bridge painted green with a concrete deck and white metal guard rails. The bridge has a 34-foot driving surface with 4-foot shoulders and the west approach to the bridge has an additionally wide (8-foot) shoulder on the north side for parking to access the historic bridge.

On both sides of Lake Creek are roads that access Lilly Lake, a few miles upstream of Lake Creek. There are campgrounds and additional mountain roads to provide outdoor recreation opportunities for hikers, campers, and anglers. This segment of road has several small loop picnic/camp spots and an access road (RD 118) to a rock/materials quarry. There are several new pullouts with viewing opportunities.

In contrast, the Muddy Creek Bridge has been completely removed and large boulders have been placed on the surface of the abandoned sections of road leading to the bridge. Young evergreen trees and shrubs have re-established themselves within the abandoned roadbed, which has been stripped of its pavement.

Originally the McNutt & Pyle construction camp at Muddy Creek, the Beartooth Road Camp, 48PA2510, managed by Yellowstone National Park to facilitate the maintenance of the road, is located near the eastern end of Segment 3. The Mess Hall and Bunkhouse were originally Civilian Conservation Corp buildings built around 1933-38 and moved by Yellowstone National Park to their present location in 1949. A chlorination building built in Mammoth in 1932 was also moved to the Beartooth Road Camp in 1949. Several other buildings such as the Sign Cache and a small cabin were originally concessions cabins in the park, built in 1925 and moved to the road camp at some unknown date although possibly in 1949 when the larger buildings were moved. Converted from a road construction camp to the road maintenance camp by the Bureau of Public Roads after 1938 with a special use permit from the Forest Service, the Beartooth Road Camp is not associated with the construction of the road and is not considered a contributing feature of the Red Lodge to Cooke City Approach Road Historic District. The maintenance facility is fundamental in the annual opening and maintenance of the road. The Beartooth Road Camp is mostly screened from view from the road by conifer trees, and not available for public visitation.

Near MP 24.1, the Pilot and Index Peak Overlook was a switchback along the original alignment, eliminated by the construction of a new cut section of roadway. The switchback was lightly carved into the landscape just south of a large low-lying glacially scarred rock outcrop, swung sharply in a U-shaped curve from north to south with an earthen bermed embankment built up to hold the edge of the road from raveling down the steep hillside. The original switchback then gracefully swung into the current and original alignment on what is now the access road into the scenic overlook. Remarkably, many of the characteristics of the original switchback are still extant on the landscape and tell the story the original road construction. The switchback has been documented (48PA3350) and is considered a contributing feature of the road historic district.

The width of the pavement through Segment 3 is a uniform 32 feet with 2 12-foot drive lanes and 4-foot shoulders on each side. The triple culvert masonry headwall is still extant on the outlet side although the intake (up-hill) culverts are surrounded with dry-laid boulders and rocks. The maximum gradient is 7.2 percent through the switchbacks that advance the road up the side of the plateau.

There are few of the informal pullouts found on unimproved segments of the road; the paved and graveled portions of the road shoulder in many areas are sufficient to accommodate a passenger car or truck. The

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location of a formal paved scenic overlook on the south side of the road about a mile east of the modern Lake Creek Bridge appears to have been selected because of the vistas presented from the site that include the Clarks Fork Yellowstone River and the Absaroka Mountains beyond. In some areas the paved ditches have a raised curb.

Segment 4: Segment 4 begins at MP 24.5 and extends eastward 18.6 miles across the Beartooth Plateau to the Montana/Wyoming state line at MP 43.1. The majority of this segment represents the original Section B. The original alignment includes a series of character-defining switchbacks that advance the road from the west side of the plateau to Beartooth Pass near the west summit and beyond. These switchbacks, located almost entirely in fragile alpine tundra, are cut into the sides of bedrock ridges that descend from the high point of the plateau. The maximum gradient of the road through this segment is 6 percent.

The width of this segment of road was originally 18 feet driving surface with 2-foot shoulders where possible. Modifications have included the installation of guardrails (in 1963), a resurfacing project (in 1967), and a micro-surfacing project (in 2000.) In 2008, Central Federal Lands Division of the Federal Highway Administration conducted major rehabilitation and reconstruction on 29.785 km (18.467 miles) of Segment 4 with additional reconstruction of a 2.7 km (1.667 miles) of roadway and reconstruction of two historic bridges in 2010. The existing 18-foot driving surface was widened to 27 feet with 3-foot paved shoulders and 6-foot graded ditches. The clear zone was widened to approximately 20 feet to 45 feet along the road corridor. The original road alignment was shifted north past the Top of the World Store and after crossing the newly constructed Little Bear Creek, the alignment shifted south until it crossed the Beartooth Creek outlet of Beartooth Lake on a new bridge constructed adjacent to the south of the historic bridge. This resulted in adding graceful curves to the otherwise straight stretch of roadway. The original alignment was re-contoured and vegetated to its natural environment. Metal culvert and drainage pipe was replaced with metal pipe –masonry headwalls, where still existing, were rehabilitated and some flared metal culvert intake and outlet end pieces were installed. The guardrails added to Segment 4 in 1963 had timber posts with galvanized W-Beam rails, and typically occur where the road traverses steep hill slopes or on the acute curves that typify the switchbacks. These modern guardrails replaced the original structures, which were built with log posts and rails. The existing 1963 guardrail was removed and replaced in 2010 with standard galvanized W-Beam and Box-Beam guardrail on the bridges. Drainage ditches, many of which were paved as part of the resurfacing project, run parallel to the road through many of the cut sections. Some rock fall ditches were cut along the roadside where possible but there are still places where the road lies directly adjacent to rock faces, such as an area known as Little Yosemite on the west end of the segment.²⁰

At the west end, Segment 4 provides access to the Clay Butte Fire Tower, now open to the public and manned with volunteers throughout the summer. Although all of the segments of the historic Red Lodge to Cooke City Approach Road offer numerous opportunities for road and trail access to high mountain lakes and campsites, Segment 4 seems to have an abundance of close to the road access. An example of some these include Beartooth Lake and Campground, Island Lake and Campground, Night Lake, Little Bear Lake, Chain Lakes, Long Lake, Fantan, Cliff, Paradise, Rainbow, Houser, Fort, Solar, Dollar, Top, Stockaide, Losekamp,

²⁰ 2008 & 2010 U.S. Department of Transportation, Federal Highway Administration Plans for Proposed Wyoming Forest Project WY HPP 4-1(5) & (6).

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Frozen, Daphnia, Blackstone, Gardner, Christmas, and Twin Lakes. The trail systems from Beartooth and Island Lakes offer even more access to some of the fisheries that contain Arctic Grayling, Cutthroat, Eastern Brook, Golden, and Rainbow Trout.

The Hi-Line Trail, 48PA2311, discussed previously, is visible in several areas along the road segment from the Top of the World Store and again along the steep switchbacks located on this portion of road. The “tote road”/trail exemplifies the effort taken by humans and pack animals to haul all that was necessary to carve the road out of a dramatic glacial mountain landscape. In Segment 4, the tote road also outlines the area where the McNutt and Pyle Long Lake construction camp, a contributing feature of the road Historic District, is located.

The 2008-2010 rehabilitation/reconstruction of this segment of the historic road resulted in some new asphalt curbs, paved drainage ditches, and installation of more drop culvert drains. A portion of the cut slope treatment and re-vegetation at the end of the 2008 construction episode resulted in slumping and general failure of the slopes and in one area rockfall impact to the newly constructed road. The 2013 reconstruction of the Long Lake bridge removed the historic structure and reconstructed a modern longer, wider bridge using local stone masonry on abutments and wing walls to compliment the remaining historic bridges.

Numerous informal pullouts occur in the unpaved shoulder and adjacent level ground, created by drivers pulling off the road to rest or to take in a view. The recent construction on this segment of road has resulted in more formal paved pullouts and many remaining gravel pullouts. The gravel pullout near the Little Yosemite views, on the west end of Segment 4, remains as do many of the gravel pullouts that provide access to the high plateau lakes. The original paved pullout at Beartooth Lake with views of the Beartooth Plateau has been enlarged and formally reconstructed with a masonry retaining wall and interpretive site depicting the original Beartooth Lake Bridge. The original cut stone from the masonry bridge was used in the construction of the interpretive area and the parking area retaining wall. A small portion of the original bridge railing is mounted on a masonry base in the interpretation area located adjacent to the new modern bridge. Pullouts are also located at Little Bear Lake, Long Lake and just west of the first switchback.

There are graveled pullouts associated with most of the switchbacks and it is apparent that the material used to excavate the uphill section of each switchback was used to construct the gravel pullouts on the downhill portion of the switchbacks. A large formal parking lot and switchback viewing area has been constructed using the disturbed area where a former large gravel/borrow pit was located. At the east end of Segment 4 a formal paved pullout has been constructed at the Wyoming-Montana border located on the top of the Beartooth Plateau at 10,280 feet above sea level.

The nature of the placement of necessary switchbacks in Segment 4 is much more spread out than those in Section 5. Along Segment 4, the Beartooth Highway meanders uphill from west to east passing through moderately forested mountains on the west reaching high alpine tundra above the tree line about mid-way through the segment. At that point the road is nearing 10,000 feet in altitude and the switchbacks begin -- clustered together in-between steep sections of curved roadway. As the road reaches the summit at 10,982 feet with a view of the Twin Lakes drainage it is perched on the top of the Beartooth Plateau for several miles of

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relatively straight (in comparison) stretch of road until it reaches the Wyoming-Montana border. Although the switchbacks on this segment of road are not as dramatic as those in Segment 5, they offer the driver many “white-knuckle” driving experiences and unforgettable “top of the world” views down dramatic glacially carved U-shaped valleys.

Segment 5: Segment 5 extends from the Montana/Wyoming state line at MP 45, roughly 15 miles east to the end of the HD at MP 60. This segment of road corresponds almost entirely to the original Section A, which was one of the first to be built – begun in 1931 and completed in 1932. This segment of road contains the five switchbacks that carry the road roughly 2,500 feet down the extremely steep north edge of the Beartooth Plateau into the bottom of the Rock Creek drainage. The maximum grade through this segment is just over 6 percent. Major reconstruction and improvement projects occurred in the mid-1960s and mid-1990s. The 1960s project included some straightening of the road, widening the paved surface to between 20 and 24 feet, replacing culverts and bridges, and constructing a formal parking area for the “Rock Creek Vista Point” (located at MP 49.1).²¹ Work conducted in the mid-1990s included resurfacing, upgrading the guardrails, scaling cut slopes, repairing slope stabilization structures added in the 1960s, and adding new gabion retaining walls²² to stabilize and restore the fill slopes.

For the most part, the alignment of this segment has not been altered; however, as stated above, the as-built width of 20 feet with an 18-foot-wide paved surface has been expanded to 26 feet in width. One short segment at the east end of the historic district, in the vicinity of the Rock Creek crossing, was realigned in 1965 when the original log Rock Creek Bridge was replaced with a modern structure. The two sections of road leading to the abandoned bridge are still visible; the north segment is screened from the current road by a massive dirt berm. Like the Gilbert Creek Bridge, only the abutments remain from the original Rock Creek Bridge.

Previous reconstruction projects have included the installation of paved drainage ditches, primarily on the sections on top of the plateau. Substantial graveled shoulders located adjacent to the driving lane on the edge of the fill, and within the curves, are present through the switchbacks. In some locations, galvanized bin walls have been added to accommodate shoulders and guardrails.

The nature of the switchbacks on Segment 5 is very long, steep, sinuous traverses across the mountainside with abrupt tight turns to facilitate the change in direction. The five switchbacks are compressed into a series of turns and are mostly all visible as you look up or down the mountainside. Although not visible from any part of the road, before the first switchback on the top of the Beartooth Plateau is a chromium surface mine that was part of the strategic mining reserve for World War II and protected by a military aircraft landing field that is accessed from the Beartooth Highway. There are several public campgrounds at the base of the mountain along Rock Creek and a variety of forest roads that provide access to wilderness areas, trail heads, lakes, and mining claims.

²¹ Bureau of Public Roads, Plans for Proposed Montana F.H. Project 59-2(1), F.L. 59(1), F.L. 59(2), Western Federal Lands Highway Division Archives, Federal Highway Administration, Vancouver, Washington.

²² A gabion is a rock-filled wire basket.

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Since the end of the initial construction period the steep terrain that characterizes the switchback sections has contributed to instability of the road prism. Material from cuts above the road erodes down slope into drainage ditches and onto the road itself, while erosion along the edge of the fill causes the grade to ravel. A variety of measures have been used to stabilize the cut slopes and the fill sections. In the 1960s, “Gunnite” or “shotcrete,”²³ was applied to the bare cut slopes between the switchbacks. Various types of retaining walls, including mortared stone, gabion, and interlocking steel, have been used to stabilize the edge of the fill, and to anchor modern guardrails.

In the spring of 2005, heavy rains coupled with snowmelt contributed to mudslides that damaged Section 5 of the road in 13 areas within the Rock Creek switchbacks between the bottom of the Rock Creek drainage and the top of the plateau. Although the damage closed the road to through traffic, the affected area was limited to the locations where the road intersected the drainage channels. At these locations the road was almost completely undermined or covered with debris. In some areas the pavement and guardrail were left hanging in mid-air. Emergency reconstruction efforts have included the removal of debris, installation of new retaining walls, reconstruction of the road grade, surfacing and installation of new guardrails through the affected areas. This work has been done along the existing alignment, and the rehabilitated sections will look similar to previous conditions; the road is scheduled to reopen on Memorial Day, 2006. Photos of the affected areas are included on continuation sheets as additional documentation.

As of the final field documentation for this nomination in August 2012, the 2005-6 repairs to Section 5 have performed well and the area of the switchbacks seem to be stable for the time being. Rock filled wire gabions were constructed to support the roadway and chain-link mesh supported by steel bars was installed to keep rockfall from hitting the driving lanes. These treatments are used only in the most severe slide areas. Several expanses of the original stone masonry cut slope retaining wall are still extant on this segment of road.

Summary: Some aspects of the structural design of the road prism have been altered since completion of initial construction. Specifically, the road has been widened, and the character of the associated drainage structures and shoulder treatment, has been modified along the majority of its length. Major alterations to the original alignment, however, have been limited to a few flattened horizontal curves. Improvements and rehabilitation of the roadway will be needed in the future but they should not alter the integrity of this high mountain transportation corridor. Overall, the road possesses sufficient design integrity to be considered a contributing resource (counted as a single structure) within the historic district.

²³ “Gunnite,” is a trade name for a patented process for the pneumatic application of concrete to a surface through a hose. The name is used generally to refer to the dry-gun application, wherein cement and sand are mixed and loaded into the hose, but the water is added to the mixture at the hose nozzle. “Shotcrete” refers to the product of “wet-gun” application, wherein water is mixed with the cement and sand before being loaded into the hose. The exact type of application represented here is undetermined. The 1963 construction drawings for Project Nos. F.L. 59(1) and 59(2) identify the material as “pneumatically applied mortar blanket.”

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Park County, WY***Buildings and Structures***²⁴

At the end of the original road construction, 10 bridges, a massive stone culvert and a stock underpass had been incorporated into the roadway between MP 0 and 60.²⁵ The bridges were of two types, timber bridges at the east and west ends of the road (generally located in forested areas), and concrete slab bridges with mortared stone components, most of which were built over higher-elevation streams that drain the west side of the plateau. The structures currently associated with the road, however, represent a mixture of historical and modern. All of the timber bridges²⁶ were replaced in the 1960s, some with new bridges (including the bridges over Index Creek, Fox Creek, Clarks Fork Yellowstone River, and Rock Creek) and others with metal or concrete culverts (including those over Sheep Creek and Wyoming Creek). Similarly, three of the original concrete slab bridges, the Lake Creek, Muddy Creek and Gilbert Creek bridges, were abandoned during modern reconstruction projects. Only one of these, the Lake Creek Bridge, was preserved in place, the other two were dismantled.

The masonry bridge over Beartooth Creek (48PA2309) at the Beartooth Lake outlet and the masonry bridge over Little Bear Creek West (48PA2308) have been completely removed and reconstructed to modern designs. Although neither bridge has any resemblance to the 1930's bridges, the masonry stone was reused to face the concrete abutments of both modern bridges. At Beartooth Creek, an interpretive wayside has been installed using the original masonry stone and a section of the original bridge railing along with an interpretive panel depicting the original bridge. In 2013, the historic Long Lake Bridge (48PA2306) was reconstructed to a longer and wider bridge. Although stone masonry abutments and two attached stone masonry retaining walls were constructed to compliment the historic look of the original bridge, the new bridge is considered modern and does not contribute to the road historic district.

One of the original bridges remains in use. It is the bridge over Little Bear Creek (48PA2307.) This bridge, as well as the Lake Creek Bridge (48PA2509) that was abandoned but preserved in place, has mortared stone abutments.²⁷ Both of the bridge railings consist of painted steel rails anchored to mortared-stone walls that rise above the abutments on either end. Overall, the stonework is typical of the period and reflects the influence of the National Park Service's Landscape Division. The locally acquired stone rubble is laid up in irregular courses with recessed mortar joints, all of which contribute to the 'rustic' appearance of the finished work, and integrate the structures into the natural environment.

²⁴ Although the general landscape characteristic is "buildings and structures," historically, there were no buildings directly associated with the road corridor. With the exception of those at the Beartooth Road Camp, the few buildings currently present (a couple of vault toilets at modern pullouts) date to the modern era. Relative to the overall scale of the historic district, they represent an insignificant resource and are not included in the resource count.

²⁵ The culvert and the stock underpass (see historical photos included as additional documentation), both originally located within the Clarks Fork Yellowstone River drainage, have been removed, probably during a 1980s reconstruction project.

²⁶ The abutments for the timber bridges consisted of rock-filled log cribs. The running surface appears to have been supported by steel stringers while log guardrails extended along the length of the abutments and the bridge itself. (See additional documentation.)

²⁷ All five bridges have been determined individually eligible for listing in the National Register through a consensus determination of eligibility between the Central Federal Lands Highway Division and the Wyoming State Historic Preservation Office.

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The modern bridges are of several different types, including concrete tee-beam (Index Creek and Fox Creek bridges), steel multi-beam (Clarks Fork Yellowstone River and Crazy Creek bridges), curved steel girder (the Lake Creek Bridge), a 7-girder pre-cast concrete bridge with masonry clad abutments and wing walls (Long Lake Bridge), and pre-stressed concrete girder (the Rock Creek bridge, the Beartooth Creek bridge and the Little Bear Creek West) bridges.

Summary: Many of the historical structures originally included in the approach road design have been replaced with new structures, or eliminated entirely. The two remaining historic bridges, however, have been determined individually eligible for listing in the National Register of Historic Places, and are counted as contributing resources within the historic district. The nine modern bridges (Index Creek, Fox Creek, Clarks Fork Yellowstone River, Crazy Creek, Lake Creek, Beartooth Creek, Long Lake, Little Bear Creek West, and Rock Creek) are counted as noncontributing resources.

Views and Vistas

As a formally designated Forest Service Scenic Byway (1989) and an All-American Road (2002), the views and vistas from the road constitute a large element of its appeal to travelers.²⁸ Like other aspects of the road corridor, the views vary from location to location, i.e., one's relationship to the landscape changes as one travels through the road corridor. At either end of the corridor, the road parallels drainages where a dense forest canopy blankets the lower hill slopes, in some areas growing to within a few feet of the roadway. In these areas, the view is channeled along the road corridor. Near Cooke City, at the west end of the road corridor, the rocky summits of major peaks such as Mineral and Republic mountains are visible above the tree line where the forest recedes from the edge of the road, such as where small openings, usually associated with wetlands or meadows, expand the viewshed. The effect of a mature forest canopy, or lack thereof, on the perception of road travelers is illustrated in the vicinity of Cooke City, where a 1988 wildfire destroyed several swaths of climax forest in 1988. The lack of timber cover opens the range of view considerably, exposing the underlying landforms and rock formations of the lower hill slopes.

Within the wider, glacially carved Clarks Fork Yellowstone River valley, views from the road are more expansive, but still bounded by mountains, the Beartooths on the north and the Absarokas on the south. The character of the view depends on the direction of travel; for those traveling west, Pilot and Index peaks stand out among the peaks of the Absaroka range. The first long distance view of the Absaroka Mountains is obtained from informal pullouts along the road, where the distinctive triangular form of Pilot Peak, a glacial horn, appears above the local landforms. From the Pilot and Index Peak Overlook, a contributing resource to the Red Lodge-Cooke City Approach Road Historic District, constructed at an abandoned switchback overlooking the Clarks Fork Yellowstone River valley, the two peaks mark the west end of the road corridor. South, across the Clarks Fork valley, the Pilgrim Limestone appears on the flank of the Absarokas as a band of light-colored cliffs, devoid of vegetation. Distant volcanic peaks of the Absaroka Range form a jagged line on the horizon. For those traveling east through the Clarks Fork valley, the eye is drawn southeast, down the

²⁸ Views are defined as an "expansive and/or panoramic prospect of a broad range of vision which may be naturally occurring or deliberately contrived." A vista is a "controlled prospect of a discrete, linear range of vision, which is deliberately contrived." See National Park Service, *Cultural Landscape Inventory Professional Procedures Guide* (Washington D.C.: U.S. Department of the Interior, 1998), 76. Note that the Beartooth Highway possesses all six of the potential intrinsic qualities identified for All-American roads, including: Archaeological, Cultural, Historic, Natural, Recreational and Scenic.

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valley, with the Absaroka Mountains rising above the river on its south side and the edge of the Beartooth Plateau visible on the northeast horizon.

At the north margin of the valley, near the point where the road ascends the edge of the plateau, the road corridor crosses several southward-flowing tributaries of the Clarks Fork Yellowstone River. The steep gradient of these streams creates falls and cascades, which, in some instances are visible from the road. The orientation of the original bridge over Lake Creek may have been selected in order to provide a view of the falls for passing motorists. For travelers of the Red Lodge-Cooke City Approach Road, this view was eliminated in 1974, with the completion of a new bridge that is farther removed from the stream course. Similarly, Crazy Creek Falls are most readily visible from a trail leading from a newly constructed pullout adjacent to a modern bridge.

The views from the road where it ascends the south side of the plateau are bounded principally by local topographic features, which restrict the field of vision to the road corridor. Exceptions include the view referred to by locals as "Little Yosemite." Accessed from a paved pullout about a mile west from Beartooth Lake, the view incorporates the upper reaches of Beartooth Creek, with peaks from the Absaroka Mountains forming the distant horizon line. Between this pullout and the Beartooth outlet bridge, about three-quarters of a mile farther east, both east- and west-bound travelers can glimpse Beartooth Falls, where Beartooth Creek emerges from between two rocky outcrops to cascade roughly 100 feet through a steep section of blocky talus.

Beartooth Lake marks the beginning of the "lakes" region of the Beartooth Plateau, where hundreds of lakes of various sizes occupy glacier-carved depressions. The scenic qualities of Beartooth Lake itself are further enhanced by the proximity of Beartooth Butte, the base of which forms the northwest shoreline of the lake. The alternating layers of gold and red in the sedimentary rocks that appear in the butte's profile contrast with the grays of the surrounding "basement rock," and with the alpine forest that crowds the lakeshore. A paved pullout located east of the lake's outlet provides access to the lakeshore, and to views of the butte rising above the surface of the lake.

From Beartooth Lake east to Beartooth Pass, the road traverses an area near timberline, dotted with lakes that appear within the foreground of the view for both eastward and westward travelers. For those traveling west, Beartooth Butte dominates the view.

The formal overlook near the west summit of Beartooth Pass provides the most expansive view from any point on the road, in terms of both radius and distance. The panorama extends from the north-northwest southward nearly 200 degrees to incorporate the Beartooth Plateau, and its west summit. The near distance incorporates blankets of alpine vegetation and fell fields; strings of lakes linked by shallow streams mark the progress of ancient glacial ice. The now distant peaks of the Absaroka Mountains occur mostly as an irregular line on the southwestern horizon. From this point, travelers heading east are provided with their first glimpse of Beartooth Butte, the top of which appears above the road.

Between the Beartooth Pass West Summit overlook and the east edge of the plateau, the foreground of the view includes expanses of tundra vegetation that typify the undulating surface of the un-glaciated uplands. Where the road parallels the plateau margin, travelers are provided with views of the upper reaches of the deeply incised Rock Creek valley, which separates the Beartooth Plateau proper from the adjacent Hell Roaring Plateau. The surface of the Hell Roaring Plateau, located about 1,000 feet below the road, fills the middle distance of the view. Beyond the plateau, the heavily dissected peaks of the Beartooth Mountains, including the

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formation from which the range derives its name, the “Bear’s Tooth,” a glacial-carved spire on the eastern flank of 12,204-foot Mt. Rearguard, may be seen from informal pullouts adjacent to the road. The Bear's Tooth is located roughly six miles northwest of the road (see additional documentation).

Towards the east end of the historic district, the Rock Creek vista overlook provides a sweeping view of the Rock Creek drainage, which forms the boundary between the Beartooth and Hell Roaring Plateaus. Located on a ridge above the east side of the drainage, the overlook also provides a view of the Wyoming Creek drainage, which marks the west edge of the Linc Creek Plateau.

Summary: The views from the approach road corridor are substantially unchanged since the historical period and contribute to the integrity of feeling and association of the historic district. Although dynamic natural phenomena such as wildfires have altered the character of the viewshed in some areas, the elements of the view continue to incorporate mostly natural systems and features.

Small-scale features

The small-scale elements currently present within the road corridor primarily reflect modern replacements of historical resources. The enameled metal signage and log safety railings installed in the road corridor during the initial construction period have been replaced with modern traffic safety and control signs, guardrails, milepost markers and edge delineators. Contemporary signage includes those that mark the special road designations, such as its scenic byway status, as well as administrative and political boundaries, such as national forest and state boundaries. The single interpretive sign that dates to the historical period has been replaced, although the mortared stone base for the sign remains.

The only small-scale historical features that remain are four, mortared-stone culvert headwalls. All of these occur in Segment 4 as described above. Like the stone elements of the historic-era bridges, the headwalls are built with material quarried from local sources. The rubble blocks are laid in irregular courses and have recessed mortar joints.

Summary: The majority of the small-scale features that typically add character to a historical property have either been removed or replaced with modern versions. The four extant stone headwalls can be counted as contributing resources (structures) within the historic district. The two modern stone headwalls are counted as noncontributing resources.

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The following table summarizes the contributing and noncontributing resource count by resource category:

**LIST OF CONTRIBUTING AND NONCONTRIBUTING RESOURCES WITHIN THE RED LODGE
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CONTRIBUTING SITES	NONCONTRIBUTING SITES
1. Gilbert Creek Bridge Site	1. Pullout with Modern Sign West of Cooke City
2. McNutt & Pyle Long Lake Camp (48PA2304)	2. Interpretive Site Between MP 1&2
3. Historic Campsite (48PA2303)	3. Pilot Gravel Pit
4. Borrow Area 2	4. West Summit Overlook
5. Borrow Area 3	5. Borrow Area Rehabilitated as Trail Head
6. Borrow Area 5	6. Borrow Areas and Access Roads
7. Borrow Area 8	7. Rock Creek (Vista) Overlook
8. Rock Creek Bridge Site	
9. Pilot & Index Peak Overlook (48PA3350)	
CONTRIBUTING STRUCTURES	NONCONTRIBUTING STRUCTURES
1. Red Lodge – Cooke City Approach Road (24PA1255), (48PA2310), & (24CB1964)	1. Modern Index Creek Bridge
2. Lake Creek Bridge (48PA2509)	2. Modern Fox Creek Bridge
3. Hi-Line Trail (48PA2311)	3. Modern Clarks Fork Yellowstone Bridge
4. Little Bear Creek Bridge East (48PA2307)	4. Modern Beartooth Creek Bridge (48PA2309) Reconstructed 2010
5. Historic Stone Headwalls (4)	5. Modern Little Bear Creek Bridge West (48PA2308) Reconstructed 2010
	6. Modern Crazy Creek Bridge
	7. Modern Lake Creek Bridge
6. Hand Laid Stone Slope Stabilization	8. Modern Stone Headwalls
	9. Modern Wyoming Creek Culvert
	10. Rock Creek Bridge
	11. Modern Long Lake Bridge
CONTRIBUTING BUILDINGS	NONCONTRIBUTING BUILDINGS
	1. Top of the World Store (48PA2305)
	2. Beartooth Road Maintenance Camp HD (48PA2510)

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Section 8. Statement of Significance, continued:*Summary Statement of Significance:*

The Red Lodge-Cooke City Approach Road Historic District qualifies for listing in the National Register of Historic Places as nationally significant under Criterion A and C. Under Criterion A, areas of significance include “transportation,” and “recreation.” Under Criterion C, the relevant area of significance is “engineering.” Under Criterion A, the road is an excellent example of the cooperative relationship between the Bureau of Public Roads (BPR)²⁹, precursor to the Federal Highway Administration, and federal land managing agencies such as the National Park Service and the U.S. Forest Service. The road was the first and most substantial to be constructed under the Park Approaches Act, passed in 1931. Its completion opened new territory for purposes of recreational development and substantially increased tourism in Yellowstone National Park and the region. Its presence facilitated the development of outdoor recreational facilities such as campgrounds, cabin lease sites and trailheads on adjacent forest service lands, and furthered the use of these areas by private individuals traveling in their own vehicles.

Under Criterion C, aspects of the road’s engineering give the Red Lodge-Cooke City Approach Road national significance. The road is one of the highest elevation roads in the United States at 10,947 feet above sea level. The location of the 60-mile road in a remote wilderness, where transport of road builders, their machinery, and materials was logistically very challenging, created circumstances that challenged traditional road-building methodology. The alpine tundra biome through which the road passes is dominated by massive glacially swept Precambrian rock with little soils and sediments to incorporate into the road bed. The large scale massive systems inhibited road construction and cold windy conditions and short construction seasons were hard on the workers, the animals, and the machinery. Steam shovels and other mechanical equipment were not as efficient at that altitude or temperatures slowing down progress. Excavated material froze in the hours between excavation and placement on the road base and therefore was difficult to compact. Caterpillars pulling “rippers” had to constantly work the excavated material to keep it usable. It was necessary to keep a crew working at night to keep equipment and construction materials from freezing solid. The tents housing equipment repairs operations often caught on fire and repairmen often experienced frost bitten fingers.

The Red Lodge-Cooke City Approach Road was built during the time when various mechanized machines were first being introduced to the road building industry. Skilled operators, talented repair mechanics, and replacement parts for these newly invented machines were not abundant, nor were the machines themselves. Built during the Great Depression, few construction companies could afford the high priced machines or the cost of the construction bonds. But the desire to provide jobs for their workers and pride in completing the project under dire conditions, and often at an economic loss was strong

Comparatively, built about the same time, the Going-To-The-Sun Road in Glacier National Park is a National Historic Landmark. The 53-miles of road climbs to 6,600-feet above sea level at its highest with few

²⁹ Note that in 1939 the BPR was renamed the Public Roads Administration (PRA) and placed under the auspices of the Federal Works Agency. In 1949, the PRA was transferred to the Department of Commerce. In 1967, it was again transferred to the Department of Transportation and renamed the Federal Highway Administration.

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switchbacks. The Trail Ridge Road in Rocky Mountain National Park, completed in the early 1930s is 37.9 miles long and 12,183 feet at its' highest. Like the Red Lodge-Cooke City Approach Road, the Trail Ridge Road is an All American Road and one of America's Byways. It was listed on the National Register of Historic Places in 1984, significant for engineering at the national, state, and local levels. The Trail Ridge Road construction had easier access to materials and equipment due to its proximity to Denver and rail service and a portion of the road corridor was previously constructed by convict labor. The Mount Evans Road in Colorado is a 15-mile one-way scenic drive finished in 1930 reaching an altitude of 12,000 feet. Its bridges historic district is listed on the National Register.

The recommended period of significance for the district is 1931 to 1938. This period includes the primary construction events, when private contractors completed grading and surfacing work that resulted in the official opening of the road to public traffic in 1936. It also includes the period referred to by the BPR and the National Park Service as the "post-construction" period, a two-year period during which Yellowstone National Park would be responsible for providing funding for finishing tasks, such as rounding and flattening cut slopes, placing signs, minor widening, and improving the grade through poorly constructed sections. Although the road continued to serve as the primary transportation link between Red Lodge and Cooke City well into the historical period, its primary contribution dates to between 1931 and 1938, when it effectively opened vehicular access to the recreational potential of the formerly remote Beartooth Plateau, created a new entrance to the park, and started the communities of Red Lodge and Cooke City, Montana on their path to tourism-based economies.

Historical Context

Public access to the National Parks via roads improved for automobile travel became a public interest as early as 1916 with the formation of the *National Park-to-Park Highway Association* which promoted roads and roadway improvements in the Northwest and Rocky Mountain states. With the advent of the automobile, concerns that poor roads adversely affected park visitation were common among the western parks. A park-to-park road would increase tourism by connecting all the western national parks through one highway. In the 1910s-1920s, the auto trail followed a large loop through the West connecting twelve National Parks: Rocky Mountain, Yellowstone, Glacier, Mount Rainier, Crater Lake, Lassen Volcano, Yosemite, General Grant (now part of Kings Canyon), Sequoia, Zion, Grand Canyon, and Mesa Verde. Based on the 1920 dedication tour, it stretched over 5,600 miles of which 26.5% was on hard surfaced road, 15.9% on improved dirt road, 24.6% on dirt road, and 31.5% on gravel surfaced road through ten western states.³⁰

With heavy lobbying by Stephen Mather and Horace Albright and other National Park advocates who wanted to improve the park-to-park highway system and recognized that states did not always have money or similar interests, Congress passed an act in 1924 allocating funds and authorizing the National Park Service to construct roads and associated structures outside the bounds of national parks. This act, in combination with an agreement between the National Park Service and the Bureau of Public Roads to work cooperatively on road projects, initiated the golden era of park road building both inside and outside of parks.

³⁰ Ethan Carr, *Wilderness by Design: Landscape Architecture and the National Park Service*, 1998, University of Nebraska Press, pp 147.

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The National Park Approach Road Bill, which became law January 31, 1931, was actually an amendment, which re-funded and redefined the 1924 act. The 1931 act helped perpetuate the golden era of road building by allocating \$1,500,000 per year for the same purposes (constructing roads approaching parks) for at least two years. Although the National Park Approach Roads Program was short-lived, there was stiff competition for the money. The competition initially included improvements and reconstruction of the wagon road between Moran Junction (inside of Grand Teton National Park) to the south boundary of Yellowstone National Park—a project funded in 1931 by the economic recovery efforts of the Civilian Conservation Corps³¹. It was easily recognized that, of the projects qualifying as “approach roads” under the new act, the 60-mile Red-Lodge – Cooke City Approach Road would use up nearly all of the first year’s funds, and it seemed to be the project with the greatest popular and political support. The other two contenders receiving Approach Road Bill funds were a new route (31.66 miles) to Grand Canyon through the Navajo Reservation and the Tusayan National Forest, and a new route (32.5 miles) connecting Sequoia National Park and General Grant (now Kings Canyon) National Park.³²

The Generals Highway in Sequoia and Kings Canyon is named after two of the largest and most famous Giant Sequoia trees, the General Sherman and General Grant trees --two of the ten most massive trees on the planet. Work began on the road in 1931 beginning at the southern intersection with California State Road 198, traveling northeast along the middle fork of the Kaweah River entering Sequoia National Park at Indian Head. The Generals Highway leaves Sequoia National Park through the north entrance, entering Sequoia National Forest. The road continues northwest through Giant Sequoia National Monument before traveling along the northern border of Kings Canyon National Park terminating at California State Road 180. The Generals Highway at the Ash Mountain center in Sequoia National Park is 1,489 feet in elevation. Through the switchbacks it rises to about 6,200 feet in elevation and drops down to between 3,000 and 4,000 feet as it enters Kings Canyon National Park.

The Generals Highway is notoriously steep, narrow, winding, and difficult to drive, especially its southern section from Hospital Rock to Giant Forest. This section has numerous switchbacks carved through groves of giant trees, a speed limit of 10 MPH, and regulations restricting the length of vehicles using the road. Two stone masonry bridges, one spanning the Marble Fork of the Kaweah River and the other over Clover Creek are listed on the National Register of Historic Places. The road was built section-by-section with additional funds necessary to complete the construction. Dedicated on June 23, 1935 at a cost of \$2.25 million, the newly named Generals Highway cemented a partnership between Sequoia National Park and the General Grant National Park. By 1940, General Grant National Park was incorporated into the newly-formed Kings Canyon National Park where the highway continued to multiply the visitation between the two parks. A major accomplishment and a beautiful scenic experience, the Generals Highway is a major feature of Sequoia and Kings Canyon National Parks.³³

³¹ John Daugherty, *A Place Called Jackson Hole: A Historic Resource Study of Grand Teton National Park*, 1994, Moose, Wyoming

³² Michael F Anderson, historian, Historic American Engineering Record No. AZ – 46, 1994

³³ www.nps.gov/seki/historyculture/generals-highway.htm

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The Cameron Approach Road is an approximately 32 mile long road from Arizona Highway 89 near Cameron, Arizona, to Desert View within Grand Canyon National Park. The first 19.8 miles of the newly proposed road crossed the Navajo Indian Reservation, then traveled west for 8.3 miles into the Tusayan National Forest, where it turned north into Grand Canyon National Park and headed north another 3.5 miles to its terminus at Desert View. The Secretary of the Interior designated the proposed road as a “national park approach road” in October of 1931 and allocated funds to begin construction. Ultimately, nine separate projects and approximately \$1,060,000 would be required to complete the 31.6 miles of road by 1935.

The Cameron Approach Road remained in service about two decades until a new road, Arizona Highway 64, was constructed and the Cameron road abandoned. Originally the road had three metal Warren deck truss highway bridges; a 40-foot structure across Tappan Wash, a 50-foot structure across Lee Canyon, and a 300-foot bridge on the Navajo Indian Reservation across Dead Indian Canyon. Today, only the 300-foot Dead Indian Canyon Bridge and mile-long segments of the old alignment, well preserved, on either side of the bridge remain of the 31.6 mile Cameron Approach Road³⁴.

The Red Lodge-Cooke City Approach Road to Yellowstone National Park takes travelers to the “Top of the World,” across the Beartooth Plateau and over Beartooth Pass located at an elevation of 10,947 feet. The road connects the south-central Montana towns of Red Lodge and Cooke City via portions of the Shoshone National Forest in northern Wyoming. Heading south from Red Lodge, the road quickly ascends the plateau. Steep switchbacks, including the delightfully named “Mae West Curve,” offer magnificent vistas to the north of the Hell Roaring and Silver Run Plateaus and, to the south, of the Line Creek Plateau.³⁵ Created by a massive uplift some 50 to 80 million years ago, this expansive plateau country is, bejeweled with alpine lakes, studded with sharp peaks, and covered by fragile tundra. Absent the road, only the most intrepid of travelers would pierce its rugged remoteness.³⁶ The many features that are called “Beartooth” take the name from the Crow Tribe’s “Na Pet Say,” the bear’s tooth. Descending from the summit, the road traverses lake country, with such lakes as Gardner, Long, Little Bear, Island and Beartooth located along the roadway. Heading toward Cooke City, the road follows the Clarks Fork Yellowstone River.

From Cooke City, the road continues another four miles to the northeast entrance of the park. One federal official, Assistant Regional Forester John Spencer, enthused over the road as its construction progressed in the early 1930s:

³⁴ Michael F. Anderson, Historic American Building Record historian, HAER No. AZ – 46, 1994

³⁵ One source credits the name “Mae West Curve” and others (“Lunch Meadow” and “High Lonesome Ridge”) to construction workers who built the road. See “Beartooth Highway,” <<http://www.ulimatemontana.com/sectionpages/Section3/articles/beartoothhighway.html>> (Dec. 7, 2004).

³⁶ An earlier road of sorts, called the Hi-Line Trail, linked the Clarks Fork Yellowstone River valley with Red Lodge. It is shown on the 1929 preliminary survey map prepared by the BPR for the Red Lodge-Cooke City Approach Road, however little other information has been found regarding this trail. It may have been constructed during the gold mining era as a means to connect Red Lodge with Cooke City; alternatively, it may represent an early forest service fire trail. The BPR engineers who conducted the survey of the proposed road corridor labeled it a “trail” thus distinguishing it from other circulation features labeled as “roads.” Extant segments of the Hi-Line Trail have been recorded as site 48PA2311. Other historic-era roads were built during the early gold mining era, including the Cody to Cooke City Wagon Road, recorded as 48PA1066. Built in 1884, the road extended from Cooke City, through the Clarks Fork Yellowstone River Valley then angled southeast through the Sunlight Basin towards Cody. Construction of the Beartooth Highway largely obliterated the segment of the wagon road west of its intersection with the Chief Joseph Highway.

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The road traverses very rugged country and because of high altitude and severe climate conditions will probably only be safe and suitable for mid-summer travel. Nevertheless, I want to say at the outset, that taken all in all, the road is the most scenic highway I've seen anywhere in the Rocky Mountains. It is entirely different from any other approach route to Yellowstone and in my opinion, immeasurably superior from the recreation travel standpoint. It crosses the top of the scenic Beartooth Plateau, keeping well above timber line in one stretch for better than ten miles. Travelers along this route obtain a smashing view of the wild rugged mountain country in the Absaroka, Custer, and Shoshone Forests, a type of scenery not found anywhere in Yellowstone Park.³⁷

Spencer correctly predicted that the combination of traveling on this road with its incomparable views and then delighting in "the noteworthy features found inside the Park itself" would "constitute a trip that is certain to prove immensely and deservedly popular."³⁸ Boosters of the road prior to its construction stressed the commercial value of linking Cooke City to Red Lodge as well as the remarkable beauty of the landscape. Opponents, while clearly holding a minority view, feared that building the road would ruin the pristine character of the plateau country. National Park and Interior Department officials, for their part, preferred building this road over allowing continued heavy commercial use of the Gardiner to Cooke City road in Yellowstone Park.³⁹ Given the remote and inaccessible nature of the area, the lack of a road paradoxically preserved its unspoiled beauty while persistently hampering its economic development, which began in the late 1860s when gold was discovered near Cooke City.

In addition to discussing the need for a road to service the Cooke City mines, this historical context also reviews the trends that affected economic development in the Red Lodge area. These trends, in turn, influenced the promotion of a road to link Red Lodge with Cooke City and Yellowstone National Park. Also examined is the campaign to build the road, which was largely orchestrated by citizens of Red Lodge. A subsection then follows that analyzes the legislative history of the National Park Approaches Act of 1931, funding from which paid for the initial construction of the road. A discussion of how the road was built and subsequently maintained, followed by a brief synopsis of road improvements during the modern era concludes this historical context.

Regional Trends that Influenced the Effort to Build the Red Lodge-Cooke City Approach Road

A number of economic, political and social factors influenced the campaign to construct a road between the communities of Red Lodge and Cooke City. Limited because of remoteness, inaccessibility and associated high transportation costs, economic development in the two communities was based on mining, ranching and, eventually, tourism. The importance of each of these economic sectors to the two communities varied and changed over time. Initially, Cooke City developed as a service community to support area mines. Gold was first discovered in the area in 1869, when four trappers spotted gold near the head of the Clarks Fork

³⁷ John W. Spencer, Assistant Regional Forester, Region 2, United States Forest Service, Memorandum for the files, Oct. 24, 1932, File 7, "1932-1933 Red Lodge-Cooke City Road Reports," Box D39, Yellowstone National Park Archives, National Archives and Records Administration, Gardiner, Montana, [hereinafter cited as NARA-Yellowstone]

³⁸ Ibid.

³⁹ See, for example, National Park Service Director A. E. Demaray's comments in a Nov. 9, 1928, memorandum for the files, excerpted in Guy D. Edwards, Acting Superintendent, Yellowstone National Park, to the Director, National Park Service, Oct. 15, 1930, File 9, "1926-27; 1930; 1932-33; 1936-39; 1940; 1943-1953; Southwest Approach Road; Flood damage between Mammoth and Gardiner; crossings of Yellowstone River; Approach roads; Livingston-Gardiner Road and Bridge; surfacing and oiling; construction projects; Red Lodge-Cooke City Approach Road," Box D8, NARA-Yellowstone.

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Yellowstone River and on upper Soda Butte Creek. As this was officially part of the Crow Indian Reservation, further prospecting abruptly ended when Indians ran off the trappers' horses. A larger party, including three of the original group, returned in 1874 and 1875 to locate several placer claims on Republic and Miller Mountains.⁴⁰

In addition to gold, other minerals mined in the vicinity of Cooke City included silver, lead, zinc, and copper. Miners named the area the New World Mining District, and news of its riches quickly spread after accounts appeared in a Bozeman, Montana, newspaper. As more miners rushed into the district, pressure mounted to restore the area to the public domain. In June of 1880, the Crow Indians agreed to cede this land, and Congress subsequently ratified the agreement on April 11, 1882. The increase in mining caught the attention of Jay Cooke, the Philadelphia financier whose firm had backed the Northern Pacific Railroad. One of the miners, George Houston, had bonded his mining claims to Cooke and his firm. Cooke ventured to Montana Territory for an inspection tour, during which miners decided to name their camp "Cooke City." Cooke, in turn, vowed to promote the building of a railroad to serve the growing town.⁴¹

But the closest terminus at the time was in Cinnabar, Montana, north of Gardiner and more than 50 miles distant. Hoping for a less expensive way to haul ore and supplies, miners lobbied for the extension of the rail line to Cooke City, which would have meant traversing the northern part of the park. Despite attempts in Congress for many years to obtain a railroad right-of-way through the park, a line from Cinnabar (and later from Gardiner) to Cooke City was never built. As a result, ore and supplies continued to be moved over a wagon road built in the early 1880s by one of the miners, John P. "Jack" Allen.⁴² As early as 1871, another miner, John H. "Yellowstone Jack" Baronett had constructed a toll bridge near the confluence of the Yellowstone and Lamar Rivers to help move men and mules to and from the mines.⁴³

In his annual report to the secretary of the Interior for 1887, Army Officer Superintendent Moses Harris described the road that led from the Baronett Bridge to the mines near Cooke City:

The road over which all supplies for the mining camp of Cooke City are freighted is through a rough and hilly country and throughout the greater portion of its extent is unimproved. Some slight grades have been made where it was absolutely necessary and a few rude bridges constructed. The road has been chiefly built by private enterprise and is by far the worst road in the Park, being well . . . impassable a large portion of the year.⁴⁴

⁴⁰ Muriel Sibell Wolle, *Montana Pay Dirt: A Guide to the Mining Camps of the Treasure State* (Denver: Sage Books, 1963; Athens, Ohio: Swallow Press/Ohio University Press, 1983), 388-389; Michael P. Malone and Richard B. Roeder, *Montana: A History of Two Centuries* (Seattle: University of Washington Press, 1980) 93.

⁴¹ Wolle, *Montana Pay Dirt*, 390; Charles J. Kappler, compiler and editor, *Indian Affairs. Laws and Treaties. Vol. I (Laws)* (Washington, D.C.: Government Printing Office, 1904), 195-197. In a subsequent agreement, dated December 8, 1890, the Crow Indians agreed to cede the land in the vicinity of Red Lodge. Congress ratified this agreement on March 3, 1891. See Kappler, Vol. I, 432-437.

⁴² Wolle, *Montana Pay Dirt*, 390-393. See also Mary Shivers Culpin, *The History of the Construction of the Road System in Yellowstone National Park, 1872-1966, Historic Resource Study, Volume I*, Selections from the Division of Cultural Resources No. 5 (Denver: Rocky Mountain Region, National Park Service, 1994), 320.

⁴³ Culpin, *The History of the Construction of the Road System in Yellowstone National Park*, 311.

⁴⁴ Army Officer Moses Harris, *Report of the Superintendent of the Yellowstone National Park to the Secretary of the Interior, 1887* (Washington, D.C.: Government Printing Office, 1887), 12, quoted in Culpin, *The History of the Construction of the Road System in Yellowstone National Park*, 314.

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The link between the need for improved transportation and Cooke City mining enterprises persisted. In April of 1915, a few months before automobiles were authorized to enter the park, Robert McKay of the Buffalo Mining Company received permission to run trucks and trailers over the park road that connected Soda Butte and Mammoth Hot Springs. McKay planned to use 15 trucks and 25 trailers to haul ore, machinery, and supplies between Cooke City and the railhead at Gardiner. In exchange, he agreed to make repairs to the road and to pay various annual license fees.⁴⁵

Although McKay spent nearly \$12,000 on road work in 1915, he did not renew the privilege the following year. Another mining interest, the Western Smelting and Power Company of Livingston, Montana, obtained similar permission, but when the company failed to meet the conditions delineated by the Interior Department its license also expired. In 1917 McKay proposed to build a new road up the Yellowstone River to Tower Junction, from Tower Junction up the Lamar Valley and then to Soda Butte Creek and into Cooke City, but could not obtain necessary funding after the United States entered World War I. He instead obtained another agreement that allowed him to haul ore and freight over the park road. Mining enterprises continued to clamor for a less expensive and more efficient means of transporting ore, machinery and supplies, whether in the form of a new hard-surface road or a railroad through the northern portion of the park. In 1920, as an alternative, Park Superintendent Horace Albright advocated constructing the Red Lodge-Cooke City road. Doing so, he maintained, would both lessen the amount of commercial traffic through the park and create a new way to travel to the park from the Billings, Montana area.⁴⁶

The economic swings that frequently plagued the mining industry in general, coupled with the high transportation costs attributable to the remoteness and inaccessibility of the Cooke City area in particular, ensured that its industrial development would remain limited. Even so, between 1900 and 1955, the New World Mining District yielded some 65,000 ounces of gold, roughly 500,000 ounces of silver, and approximately 4,100 short tons of copper, zinc and lead. Highest productivity occurred during the 1920s and during the period between 1933 and 1955. In 1926, the district produced the third largest amount of precious metals in Montana.⁴⁷ As it appeared to Cooke City mining interests, a new and reliable transportation system would only increase the development potential of the mining district.

As for the community of Red Lodge, at the time that road promoters seriously discussed building a road to Cooke City, its base economy of coal mining had experienced a severe downturn. Coal was first discovered between 1866 and 1877. Credited with the discovery is "Yankee Jim" George, a prospector and hunter who had also built a station along the wagon road that served the Clarks Fork mines near Cooke City.⁴⁸ Active coal mining in the Red Lodge area began in 1887 when Samuel Hauser, Samuel Ward, and others organized the

⁴⁵ Colonel Lloyd M. Brett, *Report of the Acting Superintendent of the Yellowstone National Park to the Secretary of the Interior, 1915* (Washington, D.C.: Government Printing Office, 1915), 8; Culpin, *The History of the Construction of the Road System in Yellowstone National Park*, 316.

⁴⁶ Culpin, *The History of the Construction of the Road System in Yellowstone National Park*, 317-320.

⁴⁷ GCM Services, Inc., "Cultural Resource Inventory and Assessment: Noranda Minerals New World Mining Project, Park County, Montana" (Butte: GCM Services, 1990), cited in Montana Department of Environmental Quality, "Historic Context," <<http://www.deq.state.mt.us/abandonedmines/linkdocs/techdocs/154tech.asp>> (Nov. 29, 2004).

⁴⁸ Doris Whithorn, "Yankee Jim George"; see also Aune Arlene Puutio Harris, "The Coal Mines," both in *Red Lodge: Saga of a Western Area*, compiled and edited by Shirley Zupan and Harry J. Owens, Carbon County Historical Society (Billings, Montana: Frontier Press, Inc., 1979), 6-7, 129.

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Rocky Fork Coal Company and located a mine on the east bench of the valley.⁴⁹ Prior to the building of a railroad to Red Lodge, freight teams delivered supplies via a wagon road that crossed Rock Creek and the Yellowstone River. Without a railroad, however, the future success of the Red Lodge coal mines remained doubtful. To be profitable, the coal mines required transportation facilities that could move large amounts of coal to fuel both the mines and smelters in the Butte-Anaconda area as well as the trains that were starting to operate throughout Montana. To capitalize on the situation and to meet this need, the Northern Pacific extended its rail line from Laurel to Red Lodge, completing the track in 1889.⁵⁰

Within a few short years, the Rocky Fork Coal Company was employing 400 miners in its East Side Mine. Many were immigrants from eastern and southern Europe, Finland, Scandinavia and the British Isles. In 1898, ownership of the mine transferred to the Northwestern Improvement Company, a subsidiary of the Northern Pacific Railway Company. By 1900, employment numbers had risen to 450 and production yields averaged 750 tons of coal a day, leading coal production in the state. The Northwestern Improvement Company next expanded operations by opening the West Side Mine. By 1910, Red Lodge's population had grown to nearly 5,000, and annual production had increased to a million tons of coal.⁵¹

During World War I, annual production at the Red Lodge-Bear Creek coal fields exceeded a million tons and, during the history of coal production in these fields, at least 16 underground mines were in operation.⁵² But in the decades after World War I, production fell for a variety of reasons including labor disputes, the effects of the Great Depression, cheaper production at the strip mines at Colstrip, Montana, and increasing use of diesel fuel instead of coal. The West Side Mine closed in the mid-1920s while the East Side Mine continued operating until 1932.⁵³

In addition to mining, agriculture, specifically cattle and sheep ranching, contributed to the economy of Red Lodge and to Carbon County, Montana. When additional lands were ceded from the Crow Indian Reservation in 1891, homesteaders began to enter on 160-acre parcels in the vicinity of Red Lodge, especially along the many creek valleys. As elsewhere in the West, this amount of acreage proved too small to be economically tenable, and the ranching operations that succeeded did so, in part, by buying failed homesteads as they became available. Sheep producers and cattlemen also relied upon the use of the public domain for rangelands to pasture their animals during the summer months. The open meadows that characterized the tablelands of the Beartooth Mountains proved very attractive to stockmen, especially those raising sheep. Abuse of public grazing lands, in part, led to the 1897 creation of the nation's first Forest Reserves, renamed National Forests in

⁴⁹ "Development of Red Lodge, Its Government and Services," in *Red Lodge: Saga of a Western Area*, 22-23; Leona Lampi, *At the Foot of the Beartooth Mountains: A History of the Finnish Community of Red Lodge, Montana* (Coeur d'Alene, Idaho: Bookage Press, 1998), 9.

⁵⁰ Shirley Zupan, "Red Lodge, Part I – Old Town," and "Mining," both in *Red Lodge: Saga of a Western Area*, 23, 129-130.

⁵¹ Zupan, "Mining," in *Red Lodge: Saga of a Western Area*, 130-131; see also Malone and Roeder, *Montana: A History of Two Centuries*, 258-259.

⁵² Zupan, "Mining," in *Red Lodge: Saga of a Western Area*, 131; see also S. B. Roberts and G. S. Rossi, "A Summary of Coal in the Fort Union Formation (Tertiary), Bighorn Basin, Wyoming and Montana," in *1999 Resource Assessment of Selected Tertiary Coal Beds and Zones in the Northern Rocky Mountains and Great Plains Region*, U.S. Geological Survey Professional Paper 1625-A, SB10 <<http://greenwood.cr.usgs.gov/energy/coal/PP1625A/Chapters?SB.pdf>> (Dec. 6, 2004).

⁵³ Zupan, "Mining," in *Red Lodge: Saga of a Western Area*, 131, 135; Malone and Roeder, *Montana: A History of Two Centuries*, 259; Lampi, *At the Foot of the Beartooth Mountains*, 123.

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1905 with the creation of the U.S. Forest Service. Along the Red Lodge-Cooke City road corridor, the first withdrawals for purposes of protecting public land occurred in 1902 with the establishment of the Absaroka Forest Reserve in 1902. Both the Custer National Forest, in Montana, and the Shoshone National Forest, in Wyoming were created in 1908. An important aspect of early forest management was the implementation of grazing leases, which included provisions to limit the numbers of livestock on the range at a given time.

Another trend that influenced development in the Red Lodge area, and which served to promote the construction of a road to the Beartooth Plateau, was the rise of the “dude ranch” industry. An outgrowth of traditional cattle ranching and guided sport hunting, the development of dude ranches in the West occurred around the same time as the establishment of the first Forest Reserves. Although the first dude ranches in Wyoming and Montana were simply traditional ranches that began charging guests for lodging, by the end of the first decade of the 1900s, individuals had begun to establish facilities for the specific purpose of wrangling dudes, not cattle. The earliest of these were located in Jackson Hole, Wyoming, on lands later incorporated into Grand Teton National Park.⁵⁴

Dude ranches began to appear in the vicinity of Red Lodge in the late 1910s. In 1917, Red Lodge native Alfred H. Croonquist and his wife Senia opened a guest ranch on the banks of Rock Creek (south of town), which they named “Camp Senia.” In 1921, Mr. and Mrs. Herbert Richel opened “Richel Lodge,” on land leased from the forest service at the base of Black Pyramid Mountain, near the confluence of Rock Creek and the Lake Fork Rock Creek. Also in 1921, Red Lodge resident, F. I. Johnson, built a rustic camp on the banks of Littlerock Creek, atop the Beartooth Plateau, also on land leased from the forest service. Equipped with tents for sleeping, Camp Sawtooth catered to fishermen. Camp Beartooth, established in the 1920s, lay on the banks of Beartooth Lake, atop the plateau. Like Camp Sawtooth, it was accessible only on foot or horseback. At the base of the plateau, near the confluence of Onemile Creek and the Clarks Fork Yellowstone River, Lawrence Nordquist's “L Bar T” ranch accommodated guests. For the most part, dude ranches catered to a clientele, often from the eastern U.S., who could afford to stay at a resort for an extended period of time and who enjoyed hardy outdoor activities. Prior to the completion of the Red Lodge-Cooke City road, the only way into the more remote ranches was by packing in on horses or mules, usually from Red Lodge.⁵⁵

In 1926, a core group of dude ranchers from Montana, Wyoming and Idaho formed the Dude Ranchers Association of the Northwest – in part to define and in part to promote the industry. Alfred Croonquist, owner of Camp Senia, was elected the organization's first Vice President. These early dude ranches and the development of Dude Rancher's Association heralded the increasingly strong role that outdoor recreation and tourism would play in the economic growth of the West.⁵⁶ As one historian has stated, the dude ranch is “the

⁵⁴ John Dougherty, *A Place Called Jackson Hole, The Historic Resource Study, Grand Teton National Park* (Moose, Wyoming: Grand Teton National Park, 1999), 220-253.

⁵⁵ “Ingress of the Beartooths,” in *Red Lodge: Saga of a Western Area*, 279-281.

⁵⁶ In September of 1926, A. H. Croonquist, owner of Camp Senia, was elected vice-president of the “Dude Ranchers Association of the Northwest,” a group composed of ranch and resort owners from Montana, Wyoming, and Idaho, as well as officials of the Northern Pacific Railway Company. The association's purposes included devising a “systematic method of caring for summer vacationists and uniform rules for conducting the business.” See “Dude Wranglers Form Association,” *Carbon County News* (Red Lodge, Mont.), Sept. 30, 1926, 1 [hereinafter cited as *Carbon County News*].

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single most unique contribution of the Rocky Mountains West to the ever-growing national vacation industry.”⁵⁷

One of the early ranches, Camp Senia, changed functions when, in the early 1930s, it became the base camp for the Yellowstone Bighorn Research Association. An outgrowth of the Princeton University Geological Survey, this association conducted research studies of the geology and paleontology of the plateau country near Red Lodge. Since the 1930s, it has involved faculty from eastern universities such as Princeton, Columbia and Amherst, as well as from Montana universities, and has gained international renown. The research association later built a permanent facility on 120 acres five miles south of Red Lodge on the western slope of Mount Maurice. One of the research association’s first local devotees, J. C. F. “Doc” Siegfriedt, also championed the construction of the Red Lodge-Cooke City road.⁵⁸

The Campaign to Construct the Red Lodge-Cooke City Approach Road

An early resident initially of Bearcreek, then of Red Lodge, physician John Charles Fredrich Siegfriedt tirelessly advocated the construction of the Red Lodge-Cooke City road. Motivated by his vision that completion of this road would enhance Red Lodge’s prosperity, Siegfriedt joined forces with other Red Lodge residents, notably newspaper publisher O. H. P. Shelley, to lobby Congress for the necessary funding to build the road.⁵⁹ These local promoters of the road anticipated that its construction would spur the economy of the area primarily by supporting mining and logging. Federal officials more often touted the scenic beauty of the road and its importance as another gateway to Yellowstone National Park. In 1915, the year that automobiles were allowed in the park, Doc Siegfriedt initiated a campaign for a road that could serve Red Lodge and the Clarks Fork valley by organizing the Black and White Trail Association. Initially, this group supported building a road that would link Red Lodge and Cody, Wyoming, by soliciting funding from individuals and companies and by advertising the benefits that would accrue to the communities to be served by the road.⁶⁰

This process was part of the Good Roads Movement, a national push to build better roads throughout the country and especially to build them to help develop the resources of the West. Initiated first in the 1880s by bicyclists seeking better road conditions, and active through the 1920s, the movement reflected the recognition that the automobile would impact the twentieth century much as the railroad had changed the nineteenth. Specific objectives of the movement included increasing links between rural areas and urban centers, thereby reducing rural isolation, and ensuring that impassable roads did not hinder rural mail delivery. Because many

⁵⁷ Lawrence R. Borne, *Dude Ranching: A Complete History* (Albuquerque, NM: University of New Mexico Press, 1983), p. 27.

⁵⁸ Michael Kennedy, “Yellowstone-Bighorn Research Association Camp,” in *Red Lodge: Saga of a Western Area*, 283-284; Thomas N. Lewis, “Doctor Siegfriedt, Father of Red Lodge Tourism,” both in *Red Lodge: Saga of a Western Area*, 272-273, 277, 280, 283-284; see also Thomas Lewis, “Contributions to Paleontology by an Early Montana Physician,” *Northwest Science* 56, no. 1 (1982):58-61. Siegfriedt enjoyed a passion for paleontology; his first discovery was a tooth that belonged to a condylarth, an early ancestor of today’s hoofed mammals. This tooth was the first entry of what became a large collection of teeth and pieces of bone found above Seam 3 in the Eagle Mine at Bearcreek. See Lewis, “Contributions to Paleontology by an Early Montana Physician,” 59.

⁵⁹ Lewis, “Doctor Siegfriedt, Father of Red Lodge Tourism,” in *Red Lodge: Saga of a Western Area*, 271, 277.

⁶⁰ Ester Johansson Murray, “Dr. Siegfriedt and the Black and White Trail,” 4, unpublished paper, copy available under “Dr. Siegfriedt, People-Families” in the vertical files of the Carbon County Historical Society, Red Lodge, Montana [hereafter CCHS]. Born in Iowa in 1879 and educated in the Midwest, Siegfriedt arrived at the Bearcreek mining camp to serve as the company doctor in 1906. He served as mayor there five times before moving to Red Lodge in 1930, where he also served as mayor. He was also a state senator from Carbon County from 1920 to 1924. Siegfriedt died in 1940 in Red Lodge. See Lewis, “Doctor Siegfriedt, Father of Red Lodge Tourism,” in *Red Lodge: Saga of a Western Area*, 271-274.

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roads that were needed traversed federally owned lands (especially in the West), and thus generated no tax base for paying for the construction, the Good Roads Movement lobbied for federal funding and succeeded in witnessing the passage of the first Federal Highway Act in 1916. The Black and White Trail Association hoped to secure federal funding for construction of the proposed road between Red Lodge and Cody. During World War I the federal government dedicated its resources primarily to the war effort, and the Good Roads Movement lost some momentum. By the war's end, Siegfriedt had changed his plan and was instead advocating building a road over the Beartooth Plateau to connect Red Lodge to Cooke City.⁶¹

By July of 1919, Siegfriedt had raised enough money, and donated much of his own, to finance the building of portions of his proposed road on the east side of Mount Maurice, a prominent peak located roughly five miles south of Red Lodge east of Rock Creek. That month, cars left Red Lodge and climbed the nearly two miles of new road to the first saddle on Mount Maurice's east side. In the spring of 1920, Siegfriedt further oversaw a reconnaissance survey that traversed the Line Creek Plateau, then descended toward Little Rocky Creek, past Little Bear Lake and Beartooth Lake to the Clarks Fork, and then up the wagon road that led from the river to Cooke City. This endeavor helped convince others that building the road over the plateau country was indeed feasible.⁶²

Joining Siegfriedt in the effort to build the Red Lodge-Cooke City road was Oliver H. P. Shelley, editor and publisher of three local newspapers and secretary of the Beartooth Boosters Club. Shortly after arriving in Red Lodge in 1924, Shelley started to actively promote the building of the road as a means to foster economic development in Red Lodge. He traveled to Washington, D.C., to campaign for the project at least seven times and won the support of the Montana delegation. In May of 1926, Shelley returned from one of these trips. Meeting him in Billings were Siegfriedt and 82 Beartooth Boosters in a procession of cars from Red Lodge to Billings. Accompanied by the Red Lodge band, the 26-car procession displayed signs that read "Cooke City or Bust," "Red Lodge the Gateway," "We are Out to Win," and "Are We Disheartened – No."⁶³

A few months later, Shelley accompanied Assistant Secretary of Agriculture R. W. Dunlap on a tour of the Cooke City mines, and, with Park Superintendent Horace Albright, a tour of Yellowstone National Park. During the tour of the mines, Shelley and Dunlap met with several businessmen of Cooke City to discuss the proposed road to Red Lodge. The *Carbon County News* later reported that:

⁶¹ Murray, "Dr. Siegfriedt and the Black and White Trail," 3-4, 6-7, 10-11. For information on the Good Roads Movement, see Paul S. Sutter, "Paved with Good Intentions: Good Roads, the Automobile, and the Rhetoric of Rural Improvement in the *Kansas Farmer*, 1890-1914, *Kansas History: A Journal of the Central Plains* 18 (4) (Winter 1995-1996):284-299, and Richard F. Weingroff, "Dr. S. M. Johnson, a 'Dreamer of Dreams'" <<http://www.fhwa.dot.gov/infrastructure/Johnson.htm>> (Dec. 9, 2004).

⁶² Walter F. Columbus, "The Black and White Trail," in *Red Lodge: Saga of a Western Area*, 274-275. The survey crew consisted of Walter "Wally" Columbus, Fred Annula, Melvin E. Martin, and T. V. Hatcher, chief engineer.

⁶³ "Large Delegation Motor to Billings to Meet the Beartooth Boosters' Representative from Washington," *Carbon County News*, May 13, 1926, 1; "Family Sketches," in *Red Lodge: Saga of a Western Area*, 387. In April of 1926, the Senate had approved a measure to fund the construction of the road but the House had rejected it. See the discussion of the legislative history of the road below.

Born in Kentucky in 1875, Shelley moved to Helena, Montana, in 1900. He later moved to Red Lodge in 1924. For 18 years he was the editor and publisher of the *Carbon County News*, as well as the editor and publisher of the *Picket-Journal* for six years. He also founded and published the *Red Lodge Daily News*. In politics, he was active in the Republican Party, serving as a delegate from Montana to the Republican National Convention in 1920 and managing the Harding campaign in Montana. See "Family Sketches," 387.

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Prospects for the Red Lodge-Cooke City Road to be built under the supervision of the Forest department for the purpose of diverting the transportation of the Cooke City ore from the Park to Red Lodge, are again favorable according to O. H. P. Shelley, editor of the *Carbon County News*, who has just returned from a three-day trip to Cooke City and the Park with R. W. Dunlap, assistant secretary of agriculture. Mr. Dunlap was very favorably impressed with mining conditions around Cooke City and realized the need of the proposed road.⁶⁴

In August of 1926, Shelley also accompanied Montana Congressman Scott Leavitt on a horseback trip over the proposed route of the road. Enroute they stayed at three of the nearby dude ranches. In an interview after the trip, as reported by the *Carbon County News*, Leavitt praised “the Beartooth’s scenic wonders,” noting that they could be “little dreamed of by anyone who has not seen them at first hand.” Claiming that the road was “absolutely necessary,” Leavitt listed the functions it would serve, including: another entrance to the park; “an outlet for the millions of feet of commercial timber in the forests which the proposed route penetrates”; and “a route that will divert untold millions of tons of ore, recently uncovered in the Cooke City mines, from the roads through the park.” Leavitt further acknowledged that the heavy commercial traffic on park roads from Cooke City was seriously damaging them.⁶⁵ Leavitt’s support for the project, along with that of Montana Senator Thomas Walsh, proved instrumental in obtaining congressional approval of funding to build the road.

Legislative History of the National Park Approaches Act of January 31, 1931

Congress authorized construction of the Red Lodge-Cooke City approach road under a piece of general legislation entitled the National Park Approaches Act of January 31, 1931. The 1931 act provided for the construction and improvement of roads within national parks, as well as authorizing and funding the construction of “national-park approach roads,” roads that the federal government designated as chiefly valuable for “carry[ing] national park travel” and that served to connect interior park roads with federal or state highway systems lying outside national parks.⁶⁶

While this law technically applied to parks nationwide and theoretically could have financed any number of national-park approach roads, the restrictions that Congress wrote into the law effectively limited its application to only a few approach roads leading into three national parks in the West (Yellowstone, Grand Canyon, and Sequoia). The most salient restrictions that limited the law’s application were that all approach roads funded under the 1931 act had to cross lands under at least 90 percent federal ownership, that the approach roads could not exceed 60 miles in length, and that no more than 40 miles of any approach road could be built in any one county.

In addition, Congress appropriated only \$3 million over two years to build all such approach roads. The inclusion of these restrictions in the 1931 National Park Approaches Act and the legislative history of their insertion therein suggest that Congress intended to use the law to finance only those approach roads that met the specific limitations imposed by the law. The Red Lodge-Cooke City road not only met nearly all of these restrictions, but its construction had also been the subject of significant congressional debate in the years

⁶⁴ *Carbon County News*, July 15, 1926, 1.

⁶⁵ “Congressman Leavitt Views Route of Proposed Red Lodge-Cooke City Road and is Favorably Impressed,” *Carbon County News*, Aug. 26, 1926, 1.

⁶⁶ National Park Approaches Act of Jan. 31, 1931, 46 Stat. 1053.

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leading up to the 1931 act's passage. This protracted debate over building the road appears, in fact, to have helped shape the final language included in the National Park Approaches Act.⁶⁷

As noted above, local boosters in Montana viewed the construction of the road primarily as a means of providing better transportation facilities to and from the Cooke City mines, and secondarily as a gateway into Yellowstone National Park. Efforts to improve the transportation system leading to Cooke City had been ongoing since the early 1870s, soon after the establishment of a mining camp there, and prior to the creation of the park. Lessening the expense of transporting ore to market remained the principal impetus for establishing a better road system throughout the late nineteenth and early twentieth centuries. Between 1880 and 1920, Congress entertained proposals from Cooke City boosters involving a number of different options for upgrading the transportation infrastructure leading into and out of town. These schemes included building a railroad from Cooke City to Gardiner, Montana, through the northern portion of Yellowstone Park; withdrawing all lands east of the Yellowstone River and north of the Lamar River from the park, in order to construct a railroad through that area; and granting permits to build a toll road from Cooke City to Gardiner. None of these proposals, however, materialized.⁶⁸

By 1920, the Cooke City boosters had determined to focus their lobbying efforts on obtaining congressional authority and federal funding to replace the nearly 50-year-old dirt wagon track connecting Cooke City and the railhead at Gardiner with a hard-surfaced road. To that end, the Montana legislature sent a memorandum to Congress, requesting that body either to appropriate \$1.5 million to build the proposed Gardiner-Cooke City highway or to grant a right of way, 200 feet in width, along that route to the mining interests at Cooke City. State legislators noted that they had examined two other possible routes, but found the proposed Gardiner-Cooke City highway to be "the only practical route by which adequate transportation facilities can be afforded at this time."⁶⁹ By 1925, however, Congress had failed to act, and the road had not been re-surfaced. Meanwhile, its continued use as a commercial route for hauling Cooke City ores to Gardiner had become a nuisance to park officials, who, in turn, placed restrictions on commercial use of the road. These officials also complained that hauling ore through the park endangered the lives of tourists, especially during peak tourist seasons.⁷⁰

Recognizing the need for an alternative route that did not cross Yellowstone National Park, mining interests at Cooke City began promoting the construction of a road that connected the town with Red Lodge. They joined forces with the town boosters and organizations in Red Lodge, including the local Good Roads Organization and the Beartooth Boosters, to champion the proposed Red Lodge-Cooke City road. These groups successfully lobbied the U.S. Forest Service and the BPR to study the route in July of 1925. In their report,

⁶⁷ Ibid. The Red Lodge-Cooke City road met all of the 1931 act's limitations except one: the 60-mile length restriction. Since the highway was roughly 68 miles long, the federal government had to fund the construction of the eight miles in excess using a combination of federal highway dollars and money appropriated for national forest roads. See G. Wetzstcon, "Red Lodge-Cooke City Highway," vertical files, CCHS.

⁶⁸ Hubert Work, Secretary of the Interior, to T. J. Walsh, U.S. Senator, Jan. 29, 1927, in Senate, *Highway from Red Lodge, Mont., to Cooke City, Mont.*, 70th Cong., 1st sess., 1928, S. Rept. 885, serial 8831, 2-3.

⁶⁹ *Congressional Record*, 66th Cong., 1st sess., May 20, 1919, 58, pt. 1: 47.

⁷⁰ *Congressional Record*, 69th Cong., 1st sess., April 20, 1926, 67, pt. 7: 7872-73; and "Statement of H. M. Albright, Superintendent of the Yellowstone National Park," no date, in Senate, *Highway from Red Lodge, Mont., to Cooke City, Mont.*, 69th Cong., 2d sess., 1927, S. Rept. 1625, serial 8685, 3-4.

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federal officials stated that the “primary object” sought by local supporters was “the development of the mineral resources of the Cooke district, the coal mines of Red Lodge[,] and the exploitation of adjacent timber.” While these boosters most often emphasized the road’s importance in promoting these extractive industries, federal officials argued that the road’s “scenic” quality and its potential “for recreation and as an entrance to the Yellowstone Park” were of greatest value.⁷¹

Despite these differing opinions, the proposed Red Lodge-Cooke City road quickly gained the support of Montana’s representatives in Congress. Montana Senator Thomas Walsh introduced the first bill proposing to fund the road, S. 3071, as an amendment to the 1921 Federal Highway Act at the legislative session following the completion of the July 1925 study. Walsh intended the Red Lodge-Cooke City road to be funded entirely with federal funds. Under the 1921 act, the U.S. government allocated a certain amount of money annually to each state for highway construction, provided that the state would spend an equal amount of “matching funds” for road building. If a state failed to spend the required amount, the “unmatched” funds earmarked for that state would be divvied among the other states. Since Montana had failed to appropriate the sums required to take full advantage of its federal highway allocation, Walsh’s bill proposed to allow the state to use its unmatched federal highway moneys to build the Red Lodge-Cooke City road. The Senate passed the bill without debate on March 2, 1926. However, instead of sending S. 3071 to the House, the Senate inserted the bill’s language as a rider into that year’s Interior Department appropriations bill. Again, the Senate agreed without debate to amend the appropriations bill accordingly.⁷²

The amendment, though, met stiff opposition in the House, despite its speedy passage in the Senate. Those who apposed the amendment either claimed that it would contravene the 1921 Federal Highway Act or suggested that it was merely a pork-barrel measure. In April of 1926, a conference committee including leading members from the House and Senate appropriations committees was unable to agree on the inclusion of Walsh’s rider into the Interior Department appropriations bill. Although Senate conferees continued their unflagging support for the measure, House committee members were equally steadfast in their opposition. Legislators debated the proposition on the House floor on April 20, 1926. Montana Representative Scott Leavitt spoke in favor of the measure, arguing that because the proposed Red Lodge-Cooke City road ran almost entirely through federally owned property – “two national forests and into a national park” – the U.S. government ought to pay for it. Moreover, he claimed that the continued use of the existing road running through Yellowstone Park to haul ore and heavy machinery between Cooke City and Gardiner was unsafe for both truck drivers and park visitors. These unsafe conditions made construction of the Red Lodge-Cooke City road an “emergency measure.” In addition to providing a safer and more efficient outlet for the Cooke City mines, Leavitt noted that the proposed road would also “furnish a fine new entrance to the Yellowstone National Park.”⁷³

⁷¹ B. F. Kitt, Associate Highway Engineer, Bureau of Public Roads, and F. E. Thieme, District Engineer, U.S. Forest Service, “Reconnaissance Investigation of Red Lodge-Cooke Project,” June 21 – July 12, 1925, Central Federal Lands Highway Administration Archives, Denver, Colorado.

⁷² *Congressional Record*, 69th Cong., 1st sess., March 2 and 17, 1926, 67, pts. 5-6: 4837-38, 5787-88.

⁷³ *Congressional Record*, 69th Cong., 1st sess., April 20, 1926, 67, pt. 7: 7872-73; and House, *Department of the Interior Appropriation Bill, 1927*, 69th Cong., 1st sess., 1926, H. Rept. 925, serial 8533, 1-9.

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Iowa Representative Cassius Dowell registered the most vehement opposition to the proposal. He claimed that funding the Red Lodge-Cooke City road represented an unfair exception to the Federal Highway Act that would benefit “one state” and thereby encourage other states to demand similar treatment. Dowell further argued that Congress should use moneys appropriated for national forest roads, not federal highway funds, to build the proposed road. Attempting to deflect such criticism, Leavitt reiterated that the Red Lodge-Cooke City road was situated “entirely within national forests on a location which would some time in the future be entirely constructed out of Federal funds” and noted that the proposed road would benefit all visitors to Yellowstone Park regardless of the state in which they resided. Michigan Congressman Louis Cramton agreed, claiming that the U.S. was obligated to build the highway because the route ran almost entirely through non-taxable federal lands into a national park and because a primary objective was to reduce traffic and lessen wear-and-tear on roads within that park. The House, however, refused to accede to these arguments and voted against the Walsh amendment.⁷⁴

Following the defeat of the Walsh amendment in 1926, Montana’s representatives adopted a new approach, introducing individual bills crafted specifically to fund the proposed Red Lodge-Cooke City road. The first of these to receive serious consideration was S. 5717, introduced in the Senate in February of 1927 and reported favorably by the Senate Committee on Post Offices and Post Roads later that month. The evidence gathered by the committee from reports and hearings suggested that, while the proposed road would provide a new entrance into Yellowstone National Park, its primary benefit would be to reduce commercial traffic within the park by diverting it toward Red Lodge. The favorable report submitted to the committee by the Department of Agriculture reflected this sentiment. Department officials stated that building the Red Lodge-Cooke City road would “relieve the traffic upon the roads within the Yellowstone National Park” and further claimed that a “special appropriation” was needed to construct it because the annual national forest road appropriations were insufficient to build the proposed road “within any reasonable time.”⁷⁵

The committee hearings on S. 5717, at which Shelley and Yellowstone Park Superintendent Horace Albright spoke in favor of the bill, also emphasized the commercial importance of the proposed road. Shelley claimed that the main purpose of S. 5717 was to “construct a roadway away from the park and divert the commercial hauling [of Cooke City ores and mining supplies] from Yellowstone Park.” He maintained further that construction of the road would significantly increase the output of the Cooke City mines, which, in turn, would “afford a great financial return to the Government.”⁷⁶ Albright corroborated Shelley’s statements, noting that “mining operations at Cooke City involve considerable use of park roads” and that park officials longed to see “a road built outside the park that would divert all this commercial traffic away from the park.” Albright clearly considered these commercial considerations to outweigh the anticipated value of the Red Lodge-Cooke City road as a park entrance:

⁷⁴ *Congressional Record*, 69th Cong., 1st sess., April 20, 1926, 67, pt. 7: 7872-77. See also House, *Department of the Interior Appropriation Bill, 1927*, 69th Cong., 1st sess., 1926, H. Rept. 1074, serial 8533, 1, in which Senate conferees agree to withdraw the amendment from the appropriations bill.

⁷⁵ R. W. Dunlap, Acting Secretary of Agriculture, to George H. Moses, Chairman, Senate Committee on Post Offices and Post Roads, Feb. 19, 1927, in Senate, *Highway from Red Lodge, Mont., to Cooke City, Mont.*, 69th Cong., 2d sess., 1927, S. Rept. 1625, serial 8685, 1.

⁷⁶ “Statement of O. H. P. Shelley, of Red Lodge, Mont.,” in Senate, *Highway from Red Lodge, Mont., to Cooke City, Mont.*, 69th Cong., 2d sess., 1927, S. Rept. 1625, serial 8685, 2-3.

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There are five gateways to the park now, one from the middle of each line and one coming in to the northwestern corner. While we do not say this is necessary as an entrance to the park – the Government departments would not say this is a necessary thing to get into the Yellowstone Park, but it would provide another very scenic gateway.⁷⁷

Despite these arguments and the committee's favorable report on S. 5717, the Senate took no further action on the bill.⁷⁸

In 1928, Senator Walsh introduced another bill proposing to fund the Red Lodge-Cooke City road. The bill, S. 3874, again received favorable consideration by the Senate Committee on Post Offices and Post Roads. Commercial concerns continued to dominate the committee's deliberations on the proposed road. Chief among the issues discussed in the committee report was the deterioration of park roads, "constructed primarily for passenger traffic," by large trucks that hauled ore and machinery between Cooke City and Gardiner across the northern part of Yellowstone Park. Committee members also maintained that park enthusiasts objected to the "commercialization" of Yellowstone and that Cooke City mining interests abhorred the "heavy [travel] restrictions" they had to endure during the tourist season. While the report did cite tourism-related benefits, such as a new park entrance and improved access to scenic areas outside the park, commercial considerations still topped the committee's list of the four main "objects" of the bill. These objectives were:

1. To afford a means of ingress to and outlet from Cooke City, Mont., a marooned village in the heart of a rich mineral region, other than by a road through the Yellowstone National Park.
2. To provide another entrance to that park, the increasing automobile traffic even now giving rise to congestion over existing entrances.
3. To afford ready access to the Absaroka National Forest for fire protection and the removal of merchantable timber.
4. To open up to tourists and campers a highly scenic region now reserved because of its inaccessibility to those of more than average wealth.⁷⁹

The committee report also reprinted a 1927 letter from Interior Secretary Hubert Work that not only favored the Red Lodge-Cooke City road, but also indicated that the Interior Department had abandoned all other proposed routes leading into and out of the Cooke City mining region. Work's letter outlined the various proposals that the federal government had considered during the late 1800s and early 1900s to relieve Cooke City's transportation difficulties. Work maintained that, of all these proposals, the Red Lodge-Cooke City road represented the most practicable route. In recommending legislation to fund the project, he stated, "It appears that the pending bill should now receive the favorable consideration of the Congress, and that any other Cooke City road plan should be definitely abandoned."⁸⁰ Although both Secretary Work and the Senate Committee on Post Offices and Post Roads endorsed S. 3874; the Senate again refused to consider it.

⁷⁷ "Statement of H. M. Albright, Superintendent of the Yellowstone National Park," in Senate, *Highway from Red Lodge, Mont., to Cooke City, Mont.*, 69th Cong., 2d sess., 1927, S. Rept. 1625, serial 8685, 3-4.

⁷⁸ *Congressional Record*, 69th Cong., 2d sess., March 1, 1927, 68, pt. 5: 5217-18.

⁷⁹ Senate, *Highway from Red Lodge, Mont., to Cooke City, Mont.*, 70th Cong., 1st sess., 1928, S. Rept. 885, serial 8831, 1-2.

⁸⁰ Hubert Work, Secretary of the Interior, to T. J. Walsh, U.S. Senate, Jan. 29, 1927, in Senate, *Highway from Red Lodge, Mont., to Cooke City, Mont.*, 70th Cong., 1st sess., 1928, S. Rept. 885, serial 8831, 2-3.

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The failure of these bills to be approved by either house of Congress appears to have encouraged Leavitt and Walsh to alter their approach for a second time. While both legislators introduced bills in 1929 proposing to fund the Red Lodge-Cooke City road (neither of which was reported out of committee),⁸¹ they had begun, by 1930, to champion bills authorizing the construction of so-called “national-park approach roads.” While these were written as pieces of general legislation that did not identify specific roads for construction, the Red Lodge-Cooke City road was clearly within their purview. Leavitt introduced the first such bill (H.R. 8000), on January 6, 1930. Within six months, a similar bill introduced by Leavitt (H.R. 12404), was favorably considered by the House Committee on Public Lands. Meanwhile, a companion bill in the Senate (S. 3073), began wending its way through the legislative system.⁸²

Committee reports and floor debates in 1930 and 1931 on this series of “national-park approach road” bills reflected Congress’s shifting intent and increasingly narrow scope with respect to the proposed approach roads legislation. In particular, legislators crafted the early versions of these bills to provide a significant amount of money, \$15 million, over several years to finance the construction of a number of roads leading into several national parks. Amendments to these original bills, however, altered their objective by allocating less money over less time in order to fund fewer approach road projects. Leavitt’s bill, H.R. 12404, which was later amended and passed into law as the National Park Approaches Act of January 31, 1931, represents a prime example. The original version of this bill appropriated \$15 million over five years to finance anticipated road projects leading into 11 different national parks. In its final form, however, H.R. 12404 narrowed the scope of the approach roads project, allocating only \$3 million to be spent on far fewer approach roads over the course of only two fiscal years.⁸³

The narrowed scope of the approach roads legislation resulted both from increases in other types of federal road funding and from pressure by the executive branch of government to reduce the proposed appropriations for national-park approach roads. These two factors had become apparent by January of 1931, when legislators debated and amended H.R. 12404 on the House floor. During the debate, Leavitt explained that Congress had recently approved bills that increased funding for federal highways, national forest roads, and roads across public domain and Indian lands. According to Leavitt, these increased appropriations would finance, or had already financed, the construction of several approach roads that Congress had intended to build under the original version of H.R. 12404:

[M]any of the roads which would have come under the provisions of this bill [the original version of H.R. 12404] are now otherwise provided for, making it unnecessary to authorize the appropriation of as much for the approach roads as was originally apparently required, and leaving only the necessity, in a general way, of providing for the construction of those highways making approaches to the national parks that are not otherwise provided for.⁸⁴

⁸¹ *Congressional Record*, 71st Cong., 1st sess., April 15 and 18, 1929, 71, pt. 1: 30, 103.

⁸² *Congressional Record*, 71st Cong., 1st sess., Jan. 6 and 10 and May 16, 1930, 72: 1140, 1347, 9110.

⁸³ House, *To Extend the Road Systems in National Parks*, 71st Cong., 2d sess., 1930, H. Rept. 1999, serial 9193, 1-4; and National Park Approaches Act of Jan. 31, 1931, 46 Stat. 1053. The National Park Service submitted a list of potential approach road projects to Congress in 1930 that showed 11 different roads that might be funded under H.R. 12404 as originally written. These included approach roads leading into the following national parks: Yellowstone, Yosemite, Rocky Mountain, Grand Canyon, Lassen Volcanic, Bryce Canyon, Mount Rainier, Crater Lake, Sequoia, General Grant, and Mesa Verde. The proposed approach road project leading into Yellowstone was the largest in both mileage and anticipated cost.

⁸⁴ *Congressional Record*, 71st Cong., 3d sess., Jan. 14, 1931, 74, pt. 2: 2165-66.

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Increased appropriations through other federal road legislation had thus provided enough money to fund most of the national-park approach roads that Congress originally intended to construct under the terms of H.R. 12404. Since there were fewer approach roads to build, the Interior Department and the Budget Bureau asked legislators to reduce the amount of money allocated for such roads in H.R. 12404. Congress acquiesced by adopting amendments to the bill that reduced the appropriations for approach roads to \$3 million, allocated over a two-year period during fiscal years 1932 and 1933. While the amended bill still appropriated a total of \$15 million, it required that \$12 million of that appropriation be spent on the construction and improvement of roads *within* national parks and that funding for approach roads be limited to \$3 million over two years. Leavitt explained the effect and reasoning behind this amendment:

I will propose an amendment, as I have stated, which will change the form of this bill, increasing the amount that can be expended on the highway systems within the parks, with a provision that for a period of two years not to exceed \$1,500,000 of that increased amount can be spent, in the discretion of the Secretary, on these approach roads. That will bring it down to a matter of \$3,000,000 over a period of two years for approach roads. That will be the limit, instead of \$15,000,000 for five years. That is done because so many roads have already been provided for, have already been built, or are being carried forward under these other increased appropriations.⁸⁵

Despite the bill's increasingly narrow terms and reduced funding, the Red Lodge-Cooke City road clearly remained within its scope. In fact, that road appears to have been one of the few targeted for construction under the amended bill. During floor debate, Leavitt made several statements intimating that the Red Lodge-Cooke City road was one of the few remaining approach roads Congress intended to finance. For example, he stated that the only "long road that could come under this bill and which would require the maximum mileage is all in a national forest area where there is no possibility of constructing it except through these Federal funds." After noting that this "long road" led to a long-standing mining region dating from the 1870s, Leavitt had to field inquiries questioning his motive in pushing the approach roads legislation. In particular, South Carolina Representative Butler Hare pointed out, "[T]here may be a desire on the part of those who have the mining claims to have these approach roads constructed at present in order that they may use them for their own benefit." Leavitt responded with another revealing statement that hinted at, but did not name, the Red Lodge-Cooke City road, clarifying that:

No, that is not the purpose behind this. It is true that there are in the vicinity of the boundary of one of the national parks some existing mining claims of long standing. There were mining claims there when Chief Joseph and his band went through in 1877. There is an area there that was then covered with mining claims. This road might open up that territory and make it easier to get to and from it; but those are existing claims at the present time, and that is just an incident to the situation.⁸⁶

While Congress significantly altered the amount and method of funding originally proposed under H.R. 12404, most of the other key provisions of the bill went virtually unchanged. The restriction limiting the length of any approach road to 60 miles appeared in the original version of H.R. 12404 and was not amended by either the House or the Senate. Similarly, the original bill contained the provision that barred any approach road from stretching more than 40 miles within any one county. This provision was neither amended nor discussed by legislators. Outside of the funding amendments, the only other significant provision that Congress amended

⁸⁵ Ibid., 2166.

⁸⁶ Ibid., 2167-68.

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involved the language requiring that national-park approach roads had to traverse lands that were at least 90 percent federally owned. As originally written, H.R. 12404 merely stipulated that such roads had to cross “lands wholly or partly owned by the Government of the United States.” Responding to fears that such language was too weak, the House agreed to amend the bill by adding the 90-percent ownership requirement during floor debate.⁸⁷

The legislative history leading to the passage of the National Park Approaches Act of January 31, 1931, reveals that Congress intended to construct the Red Lodge-Cooke City road under that law. Congress appears, in fact, to have tailored the 1931 act to fit specific road projects that met the restrictions written into the law. Moreover, passage of this act occurred, in large part, through the unflagging efforts of Montana’s representatives in Congress during the late 1920s and early 1930s, spurred by the intensity of local support for the road, to pass legislation that would finance the road by any means possible. Congress ultimately was more amenable to passing general legislation that, at least in theory, would authorize the construction of national-park approach roads nationwide, instead of providing a special appropriation for one particular road. Additionally, although the Red Lodge-Cooke City road was authorized and funded under the 1931 approach roads legislation, the commercial concerns that drove the early efforts to build the road remained chief concerns for its local supporters in both Red Lodge and Cooke City. As soon as he heard that President Herbert Hoover had signed the bill into law, O. H. P. Shelley telephoned the *Carbon County News* from Washington, D.C. to relay the good news. The people of Red Lodge, and no doubt of Cooke City as well, immediately celebrated that Saturday night.⁸⁸

The Initial Construction Period, 1931 to 1936

The Red Lodge-Cooke City approach road was the first road to receive funding under the National Park Approaches Act of January 31, 1931. Two months after Congress enacted this legislation, Secretary of the Interior Ray Lyman Wilbur formally designated the long-hoped-for highway as the “first park approach road,” allocating roughly \$1 million for the initial phase of its construction.⁸⁹ The road was a logical choice. Because of the protracted struggle to obtain congressional funding, Interior Department officials – including National Park Service Director (and former Yellowstone Park superintendent) Horace Albright – were well acquainted with the road’s potential scenic and tourist appeal, as well as its possible commercial importance. Moreover, the BPR, a sub-agency within the Department of Agriculture, had already completed a preliminary survey of the route in 1927.⁹⁰

Five years before Congress passed the 1931 act, the National Park Service and BPR had hammered out an inter-departmental agreement, under which the two agencies proposed to work cooperatively on “major” road projects within national parks. The agreement called on the park service and the BPR to “harmonize” road-construction standards in the parks with those used on federally funded highways outside the parks “to secure

⁸⁷ Ibid., 2169-70; and National Park Approaches Act of January 31, 1931, 46 Stat. 1053. A copy of the original version of H.R. 12404 is printed in House, *To Extend the Road Systems in National Parks*, 71st Cong., 2d sess., 1930, H. Rept. 1999, serial 9193, 3-4.

⁸⁸ “Red Lodge Road Bill Signed,” *Carbon County News*, Feb. 5, 1931, 1.

⁸⁹ “Wilbur Designates Red Lodge Route to Park, Fund of \$1,000,000 Ready,” *Picket-Journal* (Red Lodge, Mont.), March 26, 1931 [hereinafter cited as *Picket-Journal*].

⁹⁰ “Scenic Cooke City Road Survey is Started,” *Carbon County News*, May 26, 1927.

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the best modern practice in the location, design, construction, and improvement thereof.” In addition, it authorized the park service director to request the services of BPR engineers in the planning, surveying, contracting, and construction of park roads. The park service did not relinquish all of its authority, however. The BPR gave the National Park Service Landscape Division (centralized in San Francisco, California) final say over both BPR’s plans and specifications and over the formal acceptance of completed projects.⁹¹ In April 1925, Albright, then serving as Yellowstone superintendent, had lauded the proposed agreement, noting that BPR employed “all of the best road engineers available to the Federal Government” and that BPR-constructed roads would require fewer improvements and would last “for all time to come.”⁹²

Working under this 1926 agreement, BPR sent engineer Harry Mitchell to complete a preliminary survey of the Red Lodge-Cooke City route in the summer of 1927, while legislative wrangling over funding for the road continued in Congress. Mitchell, an Oregon native who had worked on various BPR projects throughout the Northwest and Alaska during the early 1920s, gathered a 17-man crew of surveyors and engineers and arrived in Red Lodge in late May. The crew completed its survey four months later, during the first week of October 1927. Upon completion, Mitchell reported to the Red Lodge newspapers on the stunning beauty of the proposed highway, commenting that he had “never made a survey which travels a more scenic route.” He also discussed several technical aspects of the survey. Although the route reached an elevation of nearly 11,000 feet, he claimed that it maintained a grade lower than 5 percent in all but one location, where the grade increased to 5.5 percent for a short distance. Given this relatively “easy” grade, he assured the paper’s readers that “there was no question” about the feasibility of building the road.⁹³

Presumably because of Mitchell’s previous experience surveying the Red Lodge-Cooke City road, BPR appointed him to serve as the resident engineer in charge of its construction. In June 1931, just three months after Secretary Wilbur designated it the first park approach road, Mitchell arrived again in Red Lodge with an eight-man crew of engineers to begin staking out the exact location of the new roadway. Mitchell’s duties as field engineer reflected the long-standing cooperative agreement between the park service and the BPR. As Red Lodge’s *Picket-Journal* reported, Mitchell’s assignment involved supervising construction of the highway “from an engineering standpoint,” while park service landscape engineers continued to oversee all other aspects of the work to ensure that “natural scenery is not defiled and that the construction activities are confined to the 60-foot right of way granted for the highway.”⁹⁴

⁹¹ “Memorandum of Agreement Between the National Park Service and the Bureau of Public Roads Relating to the Survey, Construction, and Improvement of Roads and Trails in the National Parks and National Monuments,” Jan. 18, 1926, in Culpin, *The History of the Construction of the Road System in Yellowstone National Park*, 403-407. See also Linda Flint McClelland, *Building the National Parks: Historic Landscape Design and Construction* (Baltimore: The Johns Hopkins University Press, 1998), 4, 187-90. McClelland states here that this cooperative agreement resulted in “a long-term relationship whereby park designers set aesthetic standards of workmanship, location, and design of roads while [BPR] engineers provided the latest technology.”

⁹² Quoted in Culpin, *The History of the Construction of the Road System in Yellowstone National Park*, 129.

⁹³ “Bureau Public Roads Crew Completes Location Survey Red Lodge-Cooke Road,” *Carbon County News*, Oct. 20, 1927. For information regarding Mitchell’s previous BPR experience and place of birth, see Form 84-M, Aug. 29, 1925, Harry Mitchell Personnel Files, copy obtained from Kathleen Shelley Tucker.

⁹⁴ “Cooke Road Bidders Look Over Units up for Contract Friday,” *Picket-Journal*, June 25, 1931; “Task of Staking Out New Red Lodge-Cooke City Highway is Begun by Engineer Mitchell,” *Carbon County News*, June 11, 1931; and “Stake Survey Started on Highway to Cooke,” *Picket-Journal*, June 11, 1931. Note that although the local newspapers referred to a 60-foot right of way, none was granted during the historical period. Rather, concern over the protection of the scenic qualities of the road corridor eventually led

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As Mitchell initiated work on the route-location survey, the BPR had begun planning to open bids for the construction of portions of the Red Lodge-Cooke City highway. Engineers in BPR's district office in Portland mapped out a construction plan that divided the road into four separate units extending from the Yellowstone Park boundary eastward to a point lying about eight miles west of Red Lodge. Since the entire route from Red Lodge to the park exceeded the 60-mile limitation imposed by the National Park Approaches Act of January 31, 1931, the BPR and the park service did not oversee construction of the eight miles immediately southwest of Red Lodge.⁹⁵ BPR divided the remaining 60 miles into four, irregularly sized construction units, labeled alphabetically as Sections A, B, C, and D. Sections A and B encompassed the high-altitude portion in the middle of the route that climbed to an 11,000-foot elevation above timberline on the Beartooth Plateau. These two units extended roughly 37 miles from a point about 14 miles southwest of Red Lodge, near the mouth of Quad Creek, to the Nordquist Ranch, where the road entered the valley of the Clarks Fork Yellowstone River. Section D continued 17 miles down that valley, through Cooke City, and into the park. Section C, meanwhile, stretched five miles from the eastern boundary of Section A to the Canyon Creek Ranger Station in the Beartooth National Forest.⁹⁶ (See additional documentation, 1934 map showing Sections A, B, C and D.)

BPR opened bids for the grading of Sections A and B on June 26, 1931, in its Portland office. The Red Lodge newspapers surmised that BPR planned to construct these two units first because they posed the greatest challenges for potential contractors, since they reached the highest elevation of the entire route and required numerous switchbacks during the ascent up the Beartooth Plateau. Before opening bids, Mitchell and other government officials from the BPR, the park service, and the forest service invited prospective bidders to take a guided tour of Sections A and B. Representatives from more than 10 construction firms accepted the invitation and viewed the route during the weekend of June 19-21, 1931. However, only a few of these companies actually placed bids on the two projects. On Section B, two firms—McNutt & Pyle of Eugene, Oregon, and S. J. Groves & Sons of Minneapolis—submitted bids, while Morrison-Knudsen of Boise, Idaho, and Winston Brothers of Minneapolis submitted bids on Section A. McNutt & Pyle were low bidders for the grading of the 25-mile segment in Section B with a bid of \$477,722.30, and Morrison-Knudsen placed a low bid of \$419,330 to grade the 12-mile stretch in Section A.⁹⁷

Although BPR had determined the low bidders by the first week of July 1931, the bureau did not award the final contracts until August. This delay was mostly due to the perilously low bid that McNutt & Pyle submitted

to the 1932 signing of an Executive Order, which resulted in the withdrawal of all (federal) lands within 250 feet on either side of the highway centerline, located east of Cooke City, for purposes of road construction.

⁹⁵ The Montana State Highway Commission and the Forest Service built this eight-mile stretch, which was divided into two roughly equal segments. The first segment extended from Red Lodge to the Beartooth National Forest boundary near Piney Dell, Montana, and the second stretched another four miles from the forest boundary to the Canyon Creek Ranger Station. See "Shortage of Finances Delays Road Program," *Picket-Journal*, April 28, 1932; and "Call Bids in August, Two Park Road Units," *Picket-Journal*, Aug. 4, 1932.

⁹⁶ For descriptions of the four units, see "Sign Contracts on Both Units of Red Lodge to Park Highway," *Picket-Journal*, July 30, 1931; and "Call Bids in August, Two Park Road Units," *Picket-Journal*, Aug. 4, 1932.

⁹⁷ "To Contract 37 Miles Cooke Road June 26," *Picket-Journal*, June 11, 1931; "Cooke Road Bidders Look Over Units up for Contract Friday," *Picket-Journal*, June 25, 1931; and "Bids on Two Units Cooke Road Total \$895,852; Await Signing," *Picket-Journal*, July 2, 1931. See also, Tabulation of Bids, in H. E. Mitchell, Asst. Highway Engineer, Bureau of Public Roads, "Final Construction Report (1931-1933) on Section B, Grading, Red Lodge-Cook Park Approach Road to Yellowstone National Park," Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado [hereinafter cited as Mitchell, "Final Construction Report (1931-1933), Section B, Grading"].

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for Section B, which was nearly \$40,000 below the engineering estimate prepared by Mitchell and over \$200,000 less than the only other bid on the unit. A report in the *Picket-Journal* worried that the bid was “so much below the estimates that their attempt to fulfill the contract would inevitably result in a tremendous loss.” The paper further speculated that McNutt & Pyle might consider forfeiting their \$24,000 bid deposit “rather than undertake the project.”⁹⁸ Instead of giving up the contract, however, company representatives re-inspected the Section-B route during the second week of July and decided to accept the contract. Although questions surrounding McNutt & Pyle’s bid delayed the formal contracting process on both units, the Interior Department was able to finalize the Section A and Section B contracts during the first week of August 1931.⁹⁹

The bidding process was only the beginning of McNutt & Pyle’s problems in finishing the grading of Section B. The company also found it extremely difficult to secure the required performance bond for the contract. McNutt & Pyle obtained its initial bond with the Southern Surety Company of New York just prior to signing their contract in July of 1931. Within six months, Southern Surety Company had fallen into receivership, leaving the contractor without a bond until July 1932, when McNutt & Pyle obtained a second performance bond with the Union Indemnity Company of New Orleans. This company, too, went bankrupt in January of 1933, forcing the contractor to take out a third bond with the Maryland Casualty Company of Baltimore, Maryland, which stayed intact through the remainder of the contract.¹⁰⁰

The construction requirements outlined in the two projects posed another set of difficulties for the contractors. The contracts for both Section A and Section B called for the companies to excavate and grade a 14-foot roadway to a 1926 Forest Highway Standard, which included a “total graded width” of 19 feet, the maintenance of a grade lower than 6 percent over the entire route, and the construction of all necessary bridges and requisite drainage structures. Challenging terrain throughout Sections A and B rendered this no easy task. The two units met at the top of the Beartooth Plateau, at an elevation of nearly 11,000 feet. Section A spanned nearly 12 miles and ascended the plateau from the Rock Creek canyon in the east. Section B, meanwhile, approached the plateau from the west, beginning in the valley of the Clarks Fork Yellowstone River and skirting Beartooth Lake and Long Lake on its way up the plateau. The extreme elevation gains within both units necessitated construction of numerous switchbacks. Moreover, weather conditions limited construction activity to short seasons during the summer and fall and thereby required the contractors to carefully plan and manage their work.¹⁰¹

McNutt & Pyle was apparently not up to the task. Harry Mitchell’s final construction report on Section B offers a scathing critique of the company’s operations (especially during the first construction season in the fall of 1931), noting that the company reported a total loss of more than \$80,000 on the project. Mitchell cited several factors that contributed to this excessive loss. First, he claimed that the company had only recently begun working with road-construction machinery, having used “horses as their source of power” on all of their

⁹⁸ “Bids on Two Units Cooke Road Total \$895,852; Await Signing,” *Picket-Journal*, July 2, 1931.

⁹⁹ “Second Inspection of Highway Route Made by Bidders,” *Carbon County News*, July 9, 1931; “Acceptance of Road Contracts Pending; Survey is Advanced,” *Carbon County News*, July 16, 1931; and “Sign Contracts on Both Units of Red Lodge to Park Highway,” *Picket-Journal*, July 30, 1931.

¹⁰⁰ Mitchell, “Final Construction Report (1931-1933), Section B, Grading,” 2-3.

¹⁰¹ Mitchell, “Final Construction Report (1931-1933), Section B, Grading,” 3; and “Final Report, Section A, Red Lodge-Cooke City National Park Approach Road,” Sept. 21, 1932, File 8, Box D39, NARA-Yellowstone, pp. 4-6.

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grading contracts prior to 1929. Moreover, the company had mainly completed small-scale grading contracts and had never done any work as large or as technically complex as that proposed in the Section B grading contract. Because of McNutt & Pyle's inexperience, the company's superintendent in charge of the project failed to assemble a sufficient amount of high-quality equipment to complete the job. Inexperience also encouraged the superintendent to make lofty statements promising unrealistic goals that proved impossible to meet. Upon hearing that the company believed it could reach Beartooth Lake (roughly the mid-point of its contract) in 30 days, Mitchell responded that this portion of the road passed through "a section of glacial boulders and solid rock reefs that would cause the most experienced superintendent deep concern." He then noted that, by the winter of 1931, McNutt & Pyle had "practically demolish[ed]" much of its equipment and that the company failed to arrive at Beartooth Lake until "almost a year later."¹⁰²

McNutt & Pyle's management of the Section B grading contract caused additional delays and further contributed to the company's loss. Mitchell reported that the contractor spent nearly \$30,000 building a "tote road" from Cooke City to the western terminus of the project area and hauling equipment and supplies to the project. Additionally, the company relied on an inexperienced work force, consisting mainly of individuals whom Mitchell callously referred to as "gippos." He noted that the company, after receiving its contract in August, hired two "gippo outfits" as its excavation team and allowed them to "walk their shovels into the project" from Gardiner, Montana, "a distance of 80 miles." While this undoubtedly delayed construction activity, Mitchell also asserted that the workers' inexperience further exacerbated the problem. After stating that McNutt & Pyle assigned these "two gippos" to excavate the high-altitude portion of Section B that lay above timberline, he commented derisively:

[T]his section ... is believed to be one of the worst sections so far as operating difficulties are concerned as was ever opened up to construction. The smartest and most capable superintendent available would be none too competent to handle this section; yet this section was stationed out to a basement digger with one shovel and a former shovel runner with the other Marion [shovel].¹⁰³

The result, according to Mitchell, was that only one operator "managed to get his shovel onto his work" during the 1931 construction season, while the other "never got his shovel on his section" before winter weather "shut them down."¹⁰⁴

To add insult to injury, the contractor had failed to construct anything more than a temporary camp at Muddy Creek during the 1931 season. By winter, McNutt & Pyle continued to rely on a "16' x 18' tent equipped to serve 18 men" as a makeshift "cook house" for its crews and had yet to build a repair shop to work on its broken-down equipment. Because of these ramshackle accommodations, "many families had to leave camp or risk freezing to death" during sub-zero winter conditions, creating what Mitchell referred to as "a sort of gypsy camp." Those who stayed were forced to work on equipment repairs in freezing temperatures, which encouraged at least one resourceful work crew to drive a truck in need of repair "into a large tent that was

¹⁰² Mitchell, "Final Construction Report (1931-1933), Section B, Grading," 3-5. Mitchell's assessment is supported by the testimony of Warren McGee, who worked as a dishwasher in the McNutt and Pyle camp at Long Lake during the 1933 season. McGee estimates that the primary shovel broke down about every 5 days, requiring a 12-hour trip to Livingston to obtain replacement parts. McGee described the McNutt and Pyle camp, as of the roughest kind, and the workers employed there as roustabouts.

¹⁰³ Ibid., 5.

¹⁰⁴ Ibid., 5-6.

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vacant for the moment.” While building a fire for warmth outside the tent using “old crankcase oil,” however, the crew accidentally “caught the tent on fire, burned it to the ground and barely saved the truck.”

Morrison-Knudsen’s work on Section A during the 1931 construction season stood in stark contrast to McNutt & Pyle’s efforts that fall. While McNutt & Pyle’s work on Section B read like a comedy of errors, Morrison-Knudsen’s operations more closely resembled a model of efficiency. Unlike McNutt & Pyle, Morrison-Knudsen relied on supervisory personnel who were, according to Mitchell, “thoroughly trained and familiar with grading work of the character encountered on this project.” He noted that the company had previously completed “three large grading projects” in Yellowstone Park between 1929 and 1931, including the Dunraven Pass Highway. Mitchell also regarded Morrison-Knudsen’s upper management and skilled laborers as a uniformly “high type” and reported that most of the supervisory and skilled workers on the Section A grading contract had “been in the employ of the company for several years” and had worked on several of the company’s earlier park projects. The experience and continuity within Morrison-Knudsen’s supervisory force allowed the project to proceed “smoothly and efficiently.”¹⁰⁵

Camp conditions also had a beneficial influence on Morrison-Knudsen’s work during the 1931 construction season. BPR’s final construction report on the Section-A grading contract touted Morrison-Knudsen’s construction camp, located “on a level area in Rock Creek Canyon about 1.5 miles from the beginning of the project,” as “the ideal camp for a contract of this size and type.” This, in turn, had a positive impact on the morale of the company’s laborers, many of whom were hired locally and were in dire need of employment during the depths of the Depression, including a large number of laid-off coal miners from Red Lodge. The BPR report claimed that the camp featured several “modern” amenities, including “wide streets, electric lighting, water supply facilities, and substantial houses, weatherproofed against the cold.” Meanwhile, “cleanliness and orderliness” typified camp life. Additionally, the camp included both a well-stocked and well-maintained blacksmith shop that allowed workers to undertake “[p]ractically any type of repair to equipment” and a telephone line that connected it to Red Lodge.¹⁰⁶

Morrison-Knudsen’s construction methods similarly facilitated efficient work during the fall of 1931. The BPR report provided a good description of the company’s “stage construction” operations on Section A, as they progressed from the floor of the Rock Creek canyon up the Beartooth Plateau. First, a 15-man crew blasted the initial cuts in the roadway by drilling holes in the mountain slopes along the route, loading the drill holes with sticks of dynamite, then blasting the rock. A group of three power shovels followed close behind, with the first of these shovels “forg[ing] ahead as rapidly as possible,” while excavating a roughly 15-foot-wide roadway “on or near” a 5-percent grade. The second shovel removed most of the remaining rock left by the pioneer shovel, as well as widening the cuts opened by the pioneer and completing “some of the ditching and sloping.” Finally, the third power shovel moved along the route “more slowly, trimming the slopes, grading, cleaning the ditches, and removing whatever unexcavated material which had been left by the other two shovels.” As the shovel

¹⁰⁵ “Final Report, Section A, Red Lodge-Cooke City National Park Approach Road,” Sept. 21, 1932, File 8, Box D39, NARA-Yellowstone, pp. 8-9.

¹⁰⁶ *Ibid.*, 10-13.

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work progressed, laborers completed necessary “roadway maintenance,” which allowed Morrison-Knudsen to maintain the roadway grade “exceptionally well” and contributed to the “pleasing appearance of the job.”¹⁰⁷

The amount of work completed during the first construction season in 1931 reflected the stark contrast between the two contractors’ operations. While BPR estimated that the Section-A grading contract was “about 55 per cent complete” by January 1932, McNutt & Pyle had barely started its excavation work on Section B, having spent most of the previous fall building its tote road from Cooke City and attempting to supply the project area. BPR attributed some of this vast disparity to climactic and topographical factors that affected Sections A and B differently, noting that the construction season on the low-altitude portions of Section A extended nearly two months longer than the Section-B construction season and that frost had a more pronounced impact on the Section B excavation work than that of Section A. However, as reflected in the BPR reports, Mitchell and other government engineers believed that work delays on Section B during the fall of 1931 were largely attributable to McNutt & Pyle’s poor management and inexperience.¹⁰⁸

Thus, Mitchell likely cheered news that the construction firm of Washburn & Hall had merged with McNutt & Pyle “for financial purposes” during the winter of 1931-1932. When BPR conducted an investigation of McNutt & Pyle’s work the following spring, government officials called for a complete reorganization of the company’s Section-B workforce by placing Washburn & Hall employees in supervisory positions to oversee the remainder of the contract. As Mitchell put it, BPR officials “assisted the contractor in revising his personnel[,] which ended in the taking over of the helpless gippos and the placing of Mr. Hall in charge of grading operations and Mr. Washburn in charge of camps and supplies.” Mitchell concluded in his final construction report that this BPR-induced reorganization “was directly responsible for keeping the company solvent and making it possible for them to complete the project.”¹⁰⁹

The influence of this reorganization became immediately apparent from the outset of the 1932 construction season. First, McNutt & Pyle subcontracted the required bridge construction within Section B to Fred Lindsay of Eugene, Oregon, who began work in the spring of 1932 and completed “the six reinforced concrete and combination steel[-]and[-]concrete bridges” that year. In September, the company, under the supervision of the newly appointed Washburn & Hall employees, also rebuilt its construction camp in a new location near Long Lake. According to Mitchell, this camp was far more substantial and spacious than the ramshackle camp established at Muddy Creek in 1931. He called it “a fair camp accommodating 100 men” and noted that it served as McNutt & Pyle’s “main headquarters” throughout the remainder of the project. The most compelling evidence of the effect of the company’s reorganization, however, was its progress in excavating the roadway.

¹⁰⁷ Ibid., 15-17, 22, 54-55, 93.

¹⁰⁸ Mitchell, “Final Construction Report (1931-1933), Section B, Grading,” 8-9; and “Final Report, Section A, Red Lodge-Cooke City National Park Approach Road,” Sept. 21, 1932, File 8, Box D39, NARA-Yellowstone, p. 7. For a good discussion of how frost impacted the excavation work on the two units differently, see “Road Work Continues in Rock Creek Canyon,” *Picket-Journal*, Dec. 3, 1931; and “Work Continues at Quad Creek as Winter Halts Unit B Contractors,” *Red Lodge Daily News-Carbon County News*, Dec. 3, 1931.

¹⁰⁹ Mitchell, “Final Construction Report (1931-1933), Section B, Grading,” 6.

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Before winter weather halted excavation work in late October, company shovels had drawn within one mile of the junction with Section A at the top of the Beartooth Plateau.¹¹⁰

Meanwhile, Morrison-Knudsen continued to proceed economically and efficiently on its Section-A grading contract. The company resumed operations in mid-April 1932, and, by late May, had begun “finishing” work on the low-altitude portions of the roadway. At the end of July, Morrison-Knudsen had reached “the rim of the Line Creek plateau,” eight miles beyond the starting point of the contract, leaving less than four miles of excavation work unfinished and an estimated 8 percent of the contract incomplete. The ascent from the floor of the Rock Creek canyon to the rim of the plateau climbed about 2,500 feet on a 5-percent grade that included four switchbacks. The remaining mileage, according to the *Picket-Journal*, was situated entirely on the plateau and thus would “offer no serious difficulty.”¹¹¹ By the first of September, Morrison-Knudsen’s pioneer shovel had nearly reached the western terminus of Section A at the top of the Beartooth Plateau, while its crews were completing “extra fills and cuts, widening of the roadbed and other dressing up” both at the top of the plateau and “on the switchback route up the canyon wall.” Within two weeks, the company had completed its Section-A grading contract. In its final construction report, BPR lauded Morrison-Knudsen’s efforts, deeming the contract as “one managed and operated in a highly efficient and economical manner and ranking among the best of the grading projects coming under [BPR’s] observation.”¹¹²

As excavation work progressed on Sections A and B, officials in BPR’s district office in Portland started planning for the opening of bids on other portions of the Red Lodge-Cooke City highway. The *Picket-Journal* reported in August 1932 that it expected the government to open bids that month for the grading of both Section C, which ran 5 miles from the eastern end of Section A northeastward to the Canyon Creek Ranger Station in the Beartooth National Forest, and Section D, which extended 17 miles from the western terminus of Section B (near Nordquist Ranch) to the Yellowstone Park boundary. An inspection trip by National Park Service Director Horace Albright, however, delayed the opening of bids on these two segments. After examining the route, Albright lobbied to have BPR officials alter their construction plans by widening the entire roadway to a “16-foot 1926 Forest Highway Standard.” BPR, working under its 1926 cooperative agreement with the park service, thus had to revise its plans and specifications and postponed the bidding on Sections C and D until November 1932.

BPR opened bids on both segments during the first week of November 1932. Since the grading of Section A was entirely complete by this time, BPR officials decided to include the surfacing of this unit with the grading contract on Section C. As written, this contract called on prospective bidders not only to grade the 5-mile segment in Section C to a 16-foot width, but also to place a 16-foot-wide gravel surface on the 17 miles in Sections A and C. The contract additionally required the successful bidder to build two bridges within Section

¹¹⁰ Mitchell, “Final Construction Report (1931-1933), Section B, Grading,” 6-7, 16-18; and “Roadwork is Checked on Plateau by Cold,” *Picket-Journal*, Oct. 27, 1932. Although McNutt & Pyle had nearly reached the junction of Sections A and B, the *Picket-Journal* reported that the company still had a significant amount of clean-up work on its grading contract and still faced “a full season’s work” in 1933.

¹¹¹ “Expect Road Junction on Plateau this Fall,” *Picket-Journal*, July 28, 1932; “Sight Seeing Trip on New Road to Feature Two Days of Rodeo,” *The Picket-Journal*, June 23, 1932; and “Final Report, Section A, Red Lodge-Cooke City National Park Approach Road,” Sept. 21, 1932, File 8, Box D39, NARA-Yellowstone, pp. 18-21.

¹¹² “Building Base Camp on Shore Long Lake,” *The Picket-Journal*, Sept. 1, 1932; and “Final Report, Section A, Red Lodge-Cooke City National Park Approach Road,” Sept. 21, 1932, File 8, Box D39, NARA-Yellowstone, pp. 18-21, 159.

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C, a 50-foot bridge across Rock Creek and a 40-foot bridge across Wyoming Creek. Finally, the low bidder had to construct guardrails on all switchbacks in Section A. Three companies bid on the project: Morrison-Knudsen; Collison and Dolven, Inc., of Billings, Montana; and Crick & Kuney of Spokane, Washington. Morrison-Knudsen won the contract with a low bid of roughly \$220,000, about \$6,000 less than the next-lowest bidder and about \$14,000 above the engineering estimate on the contract. Because Morrison-Knudsen had recently completed Section A and was then working on both the forest service and state portions of the Red Lodge-Cooke City road, the company was able to initiate a limited amount of work before winter hit the area in 1932.¹¹³

This was not the case with the successful bidder on Section D. The BPR also opened bids on this segment during the first week of November 1932, calling for prospective bidders to grade the 17 miles in Section D to a 16-foot width and to build all necessary bridges and guardrails. Six companies bid on the unit, including Winston Brothers of Minneapolis; J. L. McLaughlin of Great Falls, Montana; Morrison-Knudsen; Crick & Kuney; L. T. Lawler of Butte, Montana; and S. J. Groves & Sons of Minneapolis. Winston Brothers won the contract with a bid of \$161,472.63, which was \$12,000 below any other firm and more than \$30,000 below the engineering estimate. Unlike Morrison-Knudsen, the company was unable to begin work on Section D during the fall of 1932. This was due to several factors: winter was fast approaching; the company had to move all of its equipment into the project area; and the grading on Section B, which adjoined Section D, remained incomplete.¹¹⁴

As BPR officials planned for the opening of bids on Sections C and D, the park service and the forest service concluded efforts to widen the right-of-way for the road in order to preserve scenic viewsheds and to allow for the construction of public campgrounds and other recreational facilities along the roadway. The original right-of-way for the Red Lodge-Cooke City highway, according to the *Picket-Journal*, extended only 60 feet. Soon after Secretary Wilbur designated the highway as the first park approach road, though, officials at the BPR, the park service, and the forest service had begun recommending a more extensive right-of-way that would accomplish the above-stated goals. The existing status of lands along the roadway, however, made this difficult. Early mining activity in the Cooke City area had encouraged many individuals to place several mining claims between Cooke City and the park, while a few ranchers had obtained homestead patents for lands along the route. In an attempt to address these issues, government officials secured an executive order from President Herbert Hoover in November 1932, withdrawing from settlement and sale all public lands lying within 250 feet on either side of the road and reserving this area solely for the purpose of constructing the Red Lodge-Cooke City road.¹¹⁵

After the issuance of Hoover's executive order and after surviving the winter shutdown in 1932, contractors resumed construction activity on all sections of the road in the spring of 1933. Morrison-Knudsen continued to

¹¹³ Mitchell, "Final Construction Report (1932-1933), Section C Grading and Sections A and C Surfacing," pp. 1-2 and Tabulation of Bids.

¹¹⁴ H. E. Mitchell, "Final Construction Report (1932-1934) on Section D, Grading, Red Lodge-Cooke Park Approach Road to Yellowstone National Park," Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado, pp. 1-2 [hereinafter cited as Mitchell, "Final Construction Report (1932-1934), Section D, Grading"].

¹¹⁵ Executive Order 5949, Nov. 16, 1932; and "Resume of Correspondence in Regard to Rights-of-Way on Cooke City-Red Lodge Road," File 6, Box D40, NARA-Yellowstone. For the reference to the width of the original right-of-way, see "Cooke Road Bidders Look Over Units up for Contract Friday," *Picket-Journal*, June 25, 1931.

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exhibit a highly efficient and economical operation on Sections A and C. The company finished grading the 5-mile segment in Section C early in the spring and by April had begun its surfacing work on both sections. The work proceeded rapidly, with laborers setting up rock-crushing plants at six-mile intervals within the project area to produce the finely crushed gravel required for road surfacing. Five dump trucks hauled the gravel to the site of operations, where a "horse-drawn 6-foot blade" spread the initial "subgrade" on the roadway followed by "heavy tractor-drawn 12-foot blades" that laid down the top layer of the gravel surface. By October 14, 1933, Morrison-Knudsen had completed both its surfacing work and its log-railed bridges over Rock Creek and Wyoming Creek. Mitchell again praised the company's efficient and aesthetically pleasing work, stating, "The roadway surface is uniform and all ditches and roadway shoulders are neatly lined up and trimmed. All debris has been cleaned up from the roadside and scarred or damaged trees removed."¹¹⁶

McNutt & Pyle also completed its Section-B grading contract during the 1933 construction season. Although the company had nearly reached the junction with Section A during the fall of 1932, its laborers still had a significant amount of excavation and grading work to finish. As the *Picket-Journal* had reported in August of that year, the pioneer shovel had merely "scratch[ed] its way as lightly as possible to accomplish the junction [with Section A]," leaving the "heavier work" and finishing operations for the following spring.¹¹⁷ Because of this, McNutt & Pyle was forced to use the entire season to complete its work, finally wrapping up its grading operations in early November 1933.

In the meantime, subcontractors began other finishing work in the project area. A bridge-building firm from Eugene, Oregon, under the direction of Fred H. Lindsay, completed the six reinforced concrete and combination steel and concrete bridges during the 1932 season. Landscape architect George Otten from Portland, Oregon, organized a crew of Italian stonemasons to complete the masonry on the six bridges and the retaining walls within Section B. Mitchell praised the stonemasons, saying they "had a technique of high quality" that resulted in an attractive product, even though their inexperience with previous park service projects led to "much adjusting and replacing of stones."¹¹⁸

The Landscape Division's specifications for masonry work irritated O. H. P. Shelley. In September of 1932, Shelley wrote to then Director Horace Albright complaining that the division's involvement delayed work and induced unnecessary costs with "...masonry under the bridges that nobody will ever see." He complained to Albright that the Landscape Division was "an absolute useless leech upon the park service," and threatened to stir public opinion against them and then approach the appropriations committee to eliminate funding for the positions. In response to Shelly's tirade, Albright wrote to Thomas Vint, head of the Landscape Division, advising him to be ready to justify any "extra expense in providing for masonry facing" on bridges in Sections C and D. He stated that "regular forest standards" were sufficient for the road, the construction of which had been forced upon the park service. Albright further voiced his frustration with the forest service by stating "...

¹¹⁶ Mitchell, "Final Construction Report (1932-1933), Section C Grading and Sections A and C Surfacing," pp. 3-5 and Inspection Report, Oct. 14, 1933.

¹¹⁷ "New Contracts to be Given this Week and Next for Other Units of Park Approach," *Picket-Journal*, Aug. 18, 1932.

¹¹⁸ Mitchell, "Final Construction Report (1931-1933), Section B, Grading," 7, 11.

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by the time the forest service gets through issuing permits, any landscaping that we might give this road would be entirely wasted.”¹¹⁹

While Morrison-Knudsen and McNutt & Pyle completed their respective contracts during the 1933 construction season, Winston Brothers experienced problems on its Section-D grading contract similar to those that plagued the entire west end of the Red Lodge-Cooke City road project. First, a wet spring in 1933 delayed the initiation of work on the contract. More important, however, was that Winston Brothers underestimated the scope of the project and thus hauled in an insufficient amount of equipment—only one power shovel and two caterpillars—to complete its excavation and grading work during the 1933 season. According to Mitchell, this was the main reason that the company left the project only half-complete at the end of 1933. As with all of the projects on the Red Lodge-Cooke City road, high altitudes and severe winter weather conditions shortened the construction season on Section D to such an extent that Winston Brothers had to work in a highly efficient manner if they wished to complete the project on time and within the contracted amount. As Mitchell put it, “[I]f the contractor is the least dilatory in his operations the season will be over before he gets started.” Unfortunately, this statement accurately reflected the company’s work on Section D during the 1933 season.¹²⁰

Completion of the other contracts in 1933, however, allowed BPR to open bids for two new projects by the end of the season. The first involved placing a gravel surface over both the recently graded Section-B roadbed and the roughly 5 miles of Section D on which Winston Brothers had completed its excavation and grading work. The contract required prospective bidders to not only place a gravel surface on this 31-mile segment, but also to widen the roadway to an 18-foot “1932 Forest Highway Standard.” BPR opened bids for the project on November 2, 1933, receiving six proposals ranging from \$240,000 to \$305,000. The bids came from firms throughout the Northwest, including S. J. Groves & Sons of Minneapolis (who won the contract); Morrison-Knudsen; Max J. Kuney Co. of Spokane, Washington; Stevens Bros. of Minneapolis; Karl L. McNutt of Eugene, Oregon; and the Newport Coast Company of Portland. While S. J. Groves’s bid was nearly \$32,000 below any other proposal, it was roughly \$34,000 above the engineering estimate. Due to the lateness of the season, the company did no work on the contract before winter.¹²¹

S. J. Groves & Sons also won the second contract opened for bidding by BPR in the fall of 1933. This contract called on the company to place a half-inch bituminous surface treatment atop the gravel surface on roughly 48 miles of roadway encompassed within Sections A, B, C, and the 5 miles of Section D that had been excavated and graded by the end of 1933. It further provided for the installation of “64,000 lineal feet of rustic guard rail” along the switchback portion of Section A. BPR opened the bidding for this contract on November 17, 1933, and received four bids ranging from \$109,389 to \$126,203 from the following companies: S. J. Groves & Sons, Morrison-Knudsen, Mullan Bros. of Minneapolis, and J. C. Compton Company of McMinville,

¹¹⁹ O. H. P. Shelley to Horace M. Albright, Director, National Park Service, September 21, 1932; Albright to Thomas C. Vint, Chief Landscape Architect, National Park Service, October 3, 1932, both in File: “1933 Red Lodge-Cooke City Road Reports (Part 1 of 2),” Box D40, NARA-Yellowstone. Shelley’s protests against the involvement of the Landscape Division are likely the reason that the bridges in Sections C and D were simple timber bridges.

¹²⁰ Mitchell, “Final Construction Report (1932-1934), Section D, Grading,” 1-3.

¹²¹ H. E. Mitchell, “Final Construction Report (1934-1935) on Red Lodge-Cooke City Park Approach Road to Yellowstone National Park, Section B and Portion of D, Surfacing,” Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado, pp. 1-3 and Tabulation of Bids [hereinafter cited as Mitchell, “Final Construction Report (1934-1935), Section B and Portion of D, Surfacing”].

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Oregon. S. J. Groves, who outbid Morrison-Knudsen by a mere \$60.95, began work on the contract the following spring.¹²²

Additionally, during the spring of 1934, Winston Brothers began its push to complete the excavation and grading of the remaining 12 miles to connect with the Yellowstone Park boundary. Presumably to atone for its inefficient operations the previous summer, the company placed a new superintendent in charge of the project in 1934. This move, however, did little to address the company's problems. Mitchell noted that the new supervisor tolerated "so much inefficient operation," such as using large-capacity shovels on "scratch work" and loading excavated materials into small-capacity trucks, that the company found itself scrambling to finish its contract "in mud and snow in October." Moreover, this lack of organization largely contributed to what Mitchell referred to as an "almost unbelievable" loss of \$80,000 on the project. When the company finally completed the grading of Section D in early November 1934, Mitchell commended Winston Brothers for actually seeing the contract through to the end, despite their slow work and staggering losses:

The loss of \$80,000 on a \$161,000 contract with no appreciable variations in the type of work from the original anticipations is considered entirely out of line with any reasonable expectations. Very little praise is due the contractor on the handling of this job from his own economic standpoint, but great praise is due him for the manner in which they completed the work without quibbling, without attempting to shirk responsibilities, and with a determination to maintain the name of Winston Bros. Company as honorable and dependable constructors.¹²³

S. J. Groves & Sons faced its own problems on the two contracts the company had won in November 1933. Since these two contracts were partially overlapping, Groves sent crews to operate on both the east and west ends of the Red Lodge-Cooke City road during the spring of 1934. On the west end (encompassing Section B and five miles of Section D), the company's workers were charged with widening the roadway to an 18-foot standard and placing a gravel surface on roughly 31 miles of the road. Although BPR hoped Groves could complete the project in one season, several factors conspired to prevent this from happening. First, the company was slow in organizing its crews, which delayed the start of work for more than two weeks. Second, one of the company's two gravel-crushing plants required numerous repairs and further delayed the project because of continual breakdowns. Third, poor grading work by McNutt & Pyle on the high-altitude portions of Section B hindered Groves's surfacing work. Finally, the company's two project superintendents were "inexperienced in the construction of roadways," and, according to Mitchell, often gave conflicting instructions to the foremen in charge of the job. As a result, the company left the project only 87 percent complete, with 5 miles of the road remaining to be surfaced, when winter weather shut the project down at the end of October 1934.¹²⁴

As work slowly progressed on the west end of the project, Groves's crews started placing the bituminous surface treatment on the 17-mile segment within Sections A and C and constructing guardrails in Section A. While the company waited for the gravel surface on Sections A and C to thaw and dry, a crew of 20 workers

¹²² H. E. Mitchell, "Final Construction Report (1933-1935) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, Sections A, B, C, Portion D, Bituminous Surface Treatment," Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado, pp. 1-3 and Tabulation of Bids [hereinafter cited as Mitchell, "Final Construction Report (1933-1935), Sections A, B, C, Portion D, Bituminous Surface Treatment"].

¹²³ Mitchell, "Final Construction Report (1932-1934), Section D, Grading," 3-7.

¹²⁴ Mitchell, "Final Construction Report (1934-1935), Section B and Portion of D, Surfacing," 3-8.

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began cutting fir and pine posts for use in building the “rustic guard rail” along the switchback segment in Section A. After completion of this initial work, Groves subcontracted with the Kibbe Engineering Company of Minneapolis for the installation of the guardrails. Discussing the need for this work, Mitchell noted that, before the guardrails were installed, “frightened motorists” often drove “on the left side of the road close to the ditch to avoid getting near the unprotected outer shoulder.” Placement of the guardrails during the summer of 1934 encouraged drivers to stay closer to the shoulder, which thereby increased the “effective width of the road ... by approximately three feet.” In addition to assuaging the fears of queasy motorists, the rustic guardrails also enhanced the appearance of the roadway, according to Mitchell, who lauded Kibbe Engineering’s “very effective organization” and noted that the company relied largely on “excellent round-timber workmen” who resided locally in Red Lodge.¹²⁵

Groves’s asphalt work on the east end of the roadway in Sections A and C also proceeded smoothly during the 1934 season. Because Morrison-Knudsen had completed the gravel surface on this road segment in the fall of 1933, Groves had only to wait until the surface had dried to start work in the spring of 1934. After the gravel had “thoroughly dried and set up,” the company began by “blad[ing] up” half of the graveled roadbed in preparation for the “application of liquid asphalt.” Groves’s laborers then proceeded by applying a coat of oil on one half of the roadbed, “blading up” the other half, and finally applying an oil coating to the second half of the bed. After this initial oiling, the new surface was allowed as much exposure to the sun as possible, then the road was “opened to traffic for at least ten days” to help level out the surface. Groves then repeated this process with a second coat of oil, completing this portion of the contract during the fall of 1934. The finished product resulted in an 18-foot-wide oiled roadway with a bituminous surface “slightly in excess” of one-half-inch thick, extending from “shoulder to shoulder.” Mitchell commended Groves’s work on Sections A and C, noting that the asphalt surface “stood up very well” during the winter of 1934-35 and that, after some difficulties with the thawing process the following spring, the roadbed “stood up without failure under practically all kinds of traffic” throughout the 1935 tourist season.¹²⁶

Although Groves had moved its storage tanks and oiling equipment onto Section B soon after it completed the bituminous surface on Sections A and C, placing the bituminous surface on the west end of the road presented new delays and difficulties. Groves had not finished placing the gravel surface over Sections B and D during the fall of 1934, leaving about 5 miles of this segment of the roadway without a gravel surface. Due to cold weather, the company did not resume its graveling work until late July 1935, finally finishing it on September 20, 1935, with a total loss of \$10,000 on the contract. As this work proceeded, Groves’s laborers began oiling those portions of Sections B and D where the gravel surface was complete. Cold weather also delayed these efforts, especially on the high-altitude portion of Section B at the top of the Beartooth Plateau, where frigid temperatures and blustery winds disallowed any oiling work “until late in the summer season.” The company forged ahead, however, and completed the bituminous surface on 31 miles in Sections B and D on October 15, 1935.¹²⁷

¹²⁵ Mitchell, “Final Construction Report (1933-1935), Sections A, B, C, Portion D, Bituminous Surface Treatment,” 1-4.

¹²⁶ Mitchell, “Final Construction Report (1933-1935), Sections A, B, C, Portion D, Bituminous Surface Treatment,” 3-8.

¹²⁷ Mitchell, “Final Construction Report (1934-1935), Section B and Portion of D, Surfacing,” 6-8; and Mitchell, “Final Construction Report (1933-1935), Sections A, B, C, Portion D, Bituminous Surface Treatment,” 5-8.

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The completion of the two Groves contracts by the end of the 1935 construction season left a roughly 12-mile portion of segment D of the Red Lodge-Cooke City road without either a gravel or bituminous surface. Winston Brothers had recently finished grading this portion of the roadway in November 1934. As S. J. Groves & Sons neared completion of its two surfacing contracts, the BPR began planning to open bids for graveling and surfacing this final 12-mile stretch. BPR opened bids on the project in August 1935, and received proposals from two firms located in Great Falls, Montana, J. L. McLaughlin and S. Birch & Sons, and a third from S. J. Groves & Sons. McLaughlin won the contract with a low bid of \$141,529.50, nearly \$30,000 less than both the engineering estimate and the other two bidders. The contract required McLaughlin to place an 18-foot-wide “crushed rock or gravel surface” from a point eight miles east of Cooke City to the Yellowstone Park boundary, then to apply a three-fourths-inch-thick bituminous surface atop the gravel. McLaughlin also had to widen the road through Cooke City to 30 feet in order to accommodate a greater amount of traffic and to install “rustic log guard rail[s]” where necessary.¹²⁸

J. L. McLaughlin began work on his contract in September 1935, establishing a crushing plant within the project area for use in the production of gravel. Before winter weather shut down operations in November, the company had completed the “subgrade reinforcement” on its portion of the roadway. After resuming operations the following spring, McLaughlin finished graveling the 12-mile segment connecting to the park in July 1936. In the meantime, laborers had begun flattening slopes along the route and cutting trees needed for guardrail construction. McLaughlin also responded to several change orders issued by BPR during the summer of 1936 that altered the terms of the contract. The most significant of these called on the contractor to widen the roadway through Cooke City from 30 feet to 58 feet “to provide a more adequate width for traffic and town parking” and to build a “handlaid embankment to facilitate drainage and stabilization of wet cuts.” After receiving these change orders and finishing the gravel surface, McLaughlin began applying the bituminous surface to the roadbed. Although unseasonably rainy weather delayed this process, the company wrapped up this work in early September 1936.¹²⁹

With the completion of McLaughlin’s contract, the long-awaited Red Lodge-Cooke City highway was finally considered complete. The *Picket-Journal* cheered the news, reporting that the official opening of the “well-groomed highway” during the summer of 1936 attracted a “cosmopolitan crowd” from states as far away as Maine, Kansas, and California. Claiming that the road rivaled “the majestic beauty of the Swiss Alps” and calling it “the country’s highest and most novel highway,” the paper declared that motorists would hardly notice the climb to an 11,000-foot elevation, “so gradual is the ascent, so perfect is the wide, well-oiled highway.” The report concluded with a brief description taking the reader on an imaginary drive down the scenic Red Lodge-Cooke City highway:

One leaves Red Lodge for a 68 mile stretch of virgin beauty with a feeling of anticipation that will not be betrayed.

¹²⁸ L. A. Deklotz, Junior Highway Engineer, BPR, “Final Construction Report (1935-1936) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix,” Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado, pp. 1-2 and Tabulation of Bids [hereinafter cited as Deklotz, “Final Construction Report (1935-1936), Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix”].

¹²⁹ Deklotz, “Final Construction Report (1935-1936), Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix,” 1-10.

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For fourteen miles you drive up a scenic river grade along [R]ock [C]reek, then climb the mountain on a series of wide, easy switchbacks with guard rails to the Line Creek plateau where you ascend another series of switchbacks to the 11,000 feet altitude. Here, if you love beauty, you stop and survey the scenic panorama below ...

Going further you descend "back to earth," but a beautiful and interesting world it is ... Down you go into Clark's Fork valley where you get a new view of the magnificent beauty just passed and a glimpse of the marvelous scenery yet to come. We climb again, a river grade to Soda Butte Creek divide and then down to Cooke City, only four miles from the Park line and 32 miles from Tower Falls Junction where you can contact the main Park Loop highway.¹³⁰

Although the road required several more years of post-construction work, by 1936, locals considered the Red Lodge-Cooke City road finished. The portion of the roadway on which the BPR and the park service supervised construction extended 59.6 miles from a point roughly eight miles southwest of Red Lodge, over the 11,000-foot Beartooth Plateau, into the Clark's Fork valley, through Cooke City, and into Yellowstone National Park. As noted above, the Montana Highway Commission and the U.S. Forest Service handled construction of the remaining eight miles to Red Lodge. The approach road included a total of 13 bridges, the majority of which were located west of the Beartooth Plateau, and featured rustic guardrails along much of the roadway, including the switchback segment east of the plateau.¹³¹

In addition to providing a new entrance into the park and creating new commercial opportunities for the mines of Cooke City, construction of the highway also spurred significant recreational and tourist development along the road. By 1933, Civilian Conservation Corps laborers had built public campgrounds on national forest lands in the Rock Creek canyon east of the Beartooth Plateau, where BPR engineer Harry Mitchell expected motorists would spend the night "before climbing over the Beartooths" into the park. The forest service also staked out sites for 100 cabins and "summer homesites" along Rock Creek, as well as additional sites within the Clarks Fork valley on the west end of the road. Meanwhile, state game officials in Montana undertook a program to stock "virgin lakes" along the roadway with fish to entice traveling anglers; Red Lodge had established a tourist camp replete with nearly 50 guest cabins at the edge of town; and the numerous dude ranches along the route attracted urban dwellers hoping to capture the essence of life in the West. Finally, entrepreneurs from Livingston, Montana purchased a old timber and stone claim just outside the new northeastern entrance to Yellowstone Park and platted the town of Silver Gate, to welcome the flood of anticipated tourists into the park.¹³²

Construction of the Red Lodge-Cooke City approach road also had widely divergent impacts on the contractors who built it. While both Winston Brothers and Morrison-Knudsen prospered (with the Morrison-Knudsen firm growing into a worldwide mining, engineering, and construction conglomerate), McNutt & Pyle fell into bankruptcy soon after the completion of the project. Some of subcontractors on the roadwork faced a

¹³⁰ "Red Lodge-Cooke City Road Attracts Throngs as News of Opening Spreads," *Picket-Journal*, June 16, 1936.

¹³¹ "Route Map, Red Lodge-Cooke City National Park Approach Road, Montana & Wyoming," in Deklotz, "Final Construction Report (1935-1936), Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix."

¹³² Mitchell, "Final Construction Report (1932-1933), Section C Grading and Sections A and C Surfacing," 1; "Establish New Town at Boundary of Park," *Picket-Journal*, Jan. 21, 1932; "Beartooth Attraction Recounted by Johnson," *Picket-Journal*, March 31, 1932; "Cabin Sites Located in Beartooth Region," *Picket-Journal*, Oct. 6, 1932; "First of Forest Army Camps on Rock Creek," *Picket-Journal*, June 8, 1933; "Forest Regional Men Inspect Army's Work," *Picket-Journal*, July 20, 1933; "Outfit Tourist Park is Aim of New Board," *Picket-Journal*, March 21, 1935; and "Local Scenic Values Featured in Booklet," *Picket-Journal*, May 30, 1935.

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similar fate. George Otten, who oversaw the construction of masonry features on the bridges and retaining walls within Section B by crews of Italian stonemasons, lost his business and his home in the mid-1930s.¹³³ The human toll in terms of fatalities was relatively small, with two construction-related deaths during the initial construction period.¹³⁴ Despite the difficulties experienced by some contractors in both the construction and post-construction periods, the road quickly became a favorite among regional and national travel magazines and among travelers into the park.

Even before the completion of the Red Lodge-Cooke City highway, the route began receiving national attention from travel magazines, tourist guidebooks, and newspapers across the United States. The July 1934 edition of the *Highway Magazine*, published in Middletown, Ohio, featured a cover story on the partly completed roadway, describing in detail its scenic vistas and the "thrill of the climb up the canyon wall." The magazine proclaimed this new approach to the park would, upon completion, "surpass in beauty, thrills, and surprises any of the present approaches." Meanwhile, the 1935 *Gail's Golden Guide* – a guidebook distributed across the country to promote tourism in Montana and the West – included a "double page spread" devoted to descriptions and photographic views of the lakes, mountain peaks, and plateaus visible from the scenic highway. After its completion, the Red Lodge-Cooke City highway continued to garner national attention, receiving, for example, a lengthy advertisement in the *Salt Lake Tribune* in the summer of 1937, which proclaimed that the road left individuals "shorn of the ego of human importance" by placing them "on top of everything, where it seemed as though we could feel the spin of the earth beneath our feet and that we might at any moment be flicked off like insects into space."¹³⁵

Local and regional publications did not turn a blind eye to the picturesque new highway, nor did they ignore its potential as an economic boon for the region. Soon after its construction, the Red Lodge Commercial Club published a brochure touting the "spectacular panoramas" visible from the road, which it claimed was "the safest highway in any mountain region." It further encouraged tourists to "stay a week" in Red Lodge's "cool clean atmosphere" and to take "special side trips" to nearby oil and coal fields, golf courses, and lakes. Although the brochure was replete with photographs of the lake-studded vistas and "flowering meadows" visible from the "World's Most Scenic Highway," it was as much an advertisement for the nearby town as it was for the new roadway. Similarly, in May 1935, the *Billings Gazette* obtained Park Service authorization to publish a tabloid-sized supplement to encourage travel into the park and to southeastern Montana. Regional newspapers as far away as Lovell, Wyoming – located about 100 miles south of the new road – also touted the Red Lodge-Cooke City highway as "the finest drive in the Rocky Mountains," perhaps anticipating economic benefits from increased travel to the area east of the park.¹³⁶

¹³³ Interview with George W. Otten, July 20, 2004.

¹³⁴ Glen B. Welch, a McNutt & Pyle employee from Ashland, Oregon was killed when a powder blast discharged prematurely; Waino Timonen, a Red Lodge native employed as an oiler on a rock-crusher by the Morrison-Knudson Company, died when he fell into the machinery's pulley system; Blevins, *Beartooth Highway Experiences*, 42-43.

¹³⁵ "Trade Magazine Gives Local Highway Praise," *Picket-Journal*, July 26, 1934; "Local Scenic Values Featured in Booklet," *Picket-Journal*, May 30, 1935; and "So Impressed by New Highway and Cooke, He Writes an Ad About It," *Picket-Journal*, Sept. 7, 1937.

¹³⁶ Red Lodge Commercial Club Brochure, File 4: 1936-1937 Red Lodge-Cooke City Road Reports, Box D40, NARA-Yellowstone; J.W. Emmert, Acting Superintendent, Yellowstone National Park, to Fred Pierce, *Billings Gazette*, May 31, 1935, File 2:
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The Post-Construction Period

Although travelers first enjoyed the trip over the Red Lodge-Cooke City approach road during the summer of 1936, work continued on the road during a two-year “post-construction period.” The work consisted primarily of surfacing and patching segments of the road, stabilizing slopes, erecting signs, creating parking areas and turnouts, and removing snow, slides and fallen rock. As this work proceeded it became apparent that road maintenance, especially with respect to whose responsibility it would be to do this work after the initial two-year post-construction period, would be an issue of concern even before the inaugural use of the road.

In the Interior Department Appropriations Act for fiscal year 1936, Congress allocated \$187,000 for the surfacing of roughly 11 ½ miles of Section D as well as \$25,000 for post-construction work as needed. Additional funding for surfacing and post-construction work was to come from the Emergency Relief Act of 1935.¹³⁷ Some of these funds were used to pay for information signs along the roadway. In June of 1936, Regional Forester Evan Kelley suggested a meeting of landscape architects and other representatives of the forest service, the park service and the BPR, in order to agree upon the types of signs and markers that would best provide roadside information. In addition to highway informational and cautionary signs that would need to conform to BPR standards, there was also a need for signs that marked boundaries and signs that explained special features along the road. Boundaries to be identified included that between the park and Absaroka National Forest; the state boundary that also crossed the boundary between that forest and the Shoshone National Forest in Wyoming; the state boundary that also crossed the boundary between Shoshone and Custer National Forests; and the entrance to Custer National Forest west of Red Lodge.¹³⁸

Initially, the parties could not agree whether signs should be constructed out of wood or enamel. Representatives of the forest service preferred wood. Writing to BPR District Engineer W. H. Lynch, Kelley noted that there was “no disagreement” with the BPR “as to the number of these signs, nor to their location, but experience has shown quite conclusively that enamel signs are not satisfactory and we should like to urge the use of wood.” Lynch replied that, to the contrary, in the plateau country over which the road traversed, “wood signs in that area, particularly at the higher elevations, are not satisfactory.” Elaborating further on the problems with wood signs, Lynch continued: “The high winds prevalent [there] cut the markings in a single season and annual repainting would be necessary. In addition to the markings the sand cuts the paint and deep into the wood grain.” To prove his point, Lynch added: “The wood signs which your service placed last season were down before our forces left the field.”¹³⁹

Lynch moreover stressed that “all standard highway informational, place, name, directional and cautionary signs should conform to approved practice.” In his view, this meant that “no departmental insignia should appear” on these types of roadway signs. According to Lynch, park service officials agreed with the BPR on

1934 Red Lodge-Cooke City Road Reports, Box D40, NARA-Yellowstone; Lovell (Wyoming) *Chronicle*, July 26, 1934, in File 3: 1934 Red Lodge-Cooke City Road Reports, Box D-40, NARA-Yellowstone.

¹³⁷ Hillory A. Tolson, Acting Associate Director, National Park Service, to O. H. P. Shelley, Secretary, Beartooth Boosters' Club, July 2, 1935, File 2: “1934 Red Lodge-Cooke City Road Reports,” Box D40, NARA-Yellowstone.

¹³⁸ Evan W. Kelley, Regional Forester, to Edmund B. Rogers, Superintendent, Yellowstone National Park, June 6, 1936; and Kelley to W. H. Lynch, District Engineer, Bureau of Public Roads, Portland Oregon, June 6, 1936, both in File 2: “1934 Red Lodge-Cooke City Road Reports,” Box D40, NARA-Yellowstone.

¹³⁹ Kelley to Lynch, June 6, 1936; Lynch to Kelley, June 23, 1936, both in File 2: “1934 Red Lodge-Cooke City Road Reports,” Box D40, NARA-Yellowstone.

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this point. As for signs that marked forest boundaries or directed the public to forest service campgrounds, however, the BPR did not oppose insignia appearing on these. Finally, for small place-name signs, Lynch preferred smaller sign posts measuring four by four inches, rather than the 6-by-6-inch size that the forest service had proposed since the larger post “would look out of proportion.” He agreed with Kelley that a meeting of the various representatives on the ground to go over the road would help them reach the necessary decisions about signage.¹⁴⁰

This meeting occurred in July of 1936, but early snowstorms that fall postponed work on the proposed signs and markers. By April of the following year, the park service had agreed to erect forest boundary signs and the parties continued to agree that directional and cautionary signs would adhere to BPR specifications. The forest service was still advocating the use of wood for recreational or administrative signs. Acting Regional Forester Elers Koch explained to Yellowstone Park Superintendent Edmund Rogers that the staff at Region One had developed a type of wood sign with routed letters that the forest service found to “have many desirable features of utility and appearance.”¹⁴¹ But the forest service did not prevail with this suggestion and enamel signs were used. During the 1937 post-construction season, 60 standard cautionary road signs and 40 informational signs were installed along the entire approach road.¹⁴²

In addition to sign installation during the 1937 construction season, other work consisted principally of maintenance tasks, including snow removal, slide correction and removal, slope stabilization, drainage correction, and surfacing. The total amount of snow that was removed reached nearly 33,000 cubic yards, at a cost of 6 cents per cubic yard. Using a truck shovel and snow bucket, BPR crews dug out a one-way road during May, but late season snowstorms prevented a complete opening of the road until June 19, 1937. Workers also removed over 21,000 cubic yards of slide material. In addition to slide removal, work crews stabilized slopes and developed a few parking turnouts by transporting material obtained from flattening slopes and spreading it over rocky areas. Other jobs included repairing unstable grade conditions as well as widening and deepening ditches to lower the water table through swampy areas.¹⁴³ Funding for the work issued from the park's roads account.

¹⁴⁰ Lynch to Kelley, June 23, 1936, File 2: “1934 Red Lodge-Cooke City Road Reports,” Box D40, NARA-Yellowstone.

¹⁴¹ Elers Koch, Acting Regional Forester, to Edmund Rogers, Superintendent, Yellowstone National Park, April 9, 1937, File 4: “1936-1937 Red Lodge-Cooke City Road Reports,” Box D40, NARA-Yellowstone.

¹⁴² C. B. Petersen, Instrumentman, “Final Post Construction Report (1935-1938) on Sections A, B, C & D of the Red Lodge-Cooke City Approach Road to Yellowstone National Park,” April 10, 1939, 4 and 14, File 9: “1926-27; 1930; 1932-33; 1936-39; 1940; 1943-1953; Southwest Approach Road; Flood damage between Mammoth and Gardiner; crossings of Yellowstone River; Approach roads; Livingston-Gardiner Road and Bridge; surfacing and oiling; construction projects; Red Lodge-Cooke City Approach Road,” Box D8, NARA-Yellowstone [hereinafter Petersen, Final Construction Report (1935-1938)]. By 1940, after several seasons of travel over the road, a new problem had developed with respect to types of signs along the roadway. Awed by the beauty of the landscape, motorists were stopping on the road itself, rather than at parking areas or turnouts. In June of 1940, to deal with the problem, Petersen, in his role as an engineer with district one of the Public Roads Administration, advocated erecting signs that read “Do Not Stop on the Pavement.” Sanford Hill, the resident landscape architect in Yellowstone National Park, however, suggested using these particular signs “sparingly” and only in conjunction with other signs that informed drivers that parking areas or turnouts lay just ahead. Superintendent Rogers agreed with Hill. See C. B. Petersen, Senior Engineer Aide, District One, Public Roads Administration, to Edmund Rogers, Superintendent, Yellowstone National Park, June 12, 1940; Sanford Hill, Resident Landscape Architect, Yellowstone National Park, “Branch of Plans and Design Comment,” June 29, 1940; Rogers to Peterson, July 3, 1940, all in File: “632, Roads Outside of Park (Red Lodge-Cooke City Approach (Northeast), Part 3, Jan. 1, 1940 to Dec. 31, 1943,” Box D83, NARA-Yellowstone.

¹⁴³ Petersen, Final Post Construction Report (1935-1938), 3-4, 11-12.

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During the 1937 season, the J. L. McLaughlin and Stella H. McLaughlin contracting company completed bituminous surfacing on just over 17 miles in Sections A and C, having won the contract for the project by submitting the low bid.¹⁴⁴ The project relied on aggregate that had been produced and stockpiled in 1933, and when that material was exhausted, new aggregate was mixed to cover the remaining portions of the roadway. Surfacing width was 18 feet. Sealing operations began on August 30, followed by the final cleanup of ditches and culverts in early October. The final cost upon conclusion of the project totaled nearly \$80,000.¹⁴⁵ Park Superintendent Edmund Rogers subsequently notified Lynch of BPR that park representatives had inspected the surfacing job and found it to be “completed to the satisfaction of this office.”¹⁴⁶

In 1938, BPR crews were able to open the road on June 10, a little earlier than the previous year. They handled snow removal in much the same way as during the 1937 season, with the exception of renting a “3-auger Sno-go” from Yellowstone National Park. By the end of July, workers had also removed over 12,000 cubic yards of slide material on slopes in Sections A and C. Hoping to reduce the amount of slide removal in the future, workers performed more resloping than had been done during past construction seasons. No repair or patchwork of the bituminous surfacing that had been applied on Sections A and C in 1937 was necessary. During the month of August, crews stabilized slopes and improved ditches on Sections B and D. Unsatisfactory surface conditions on these sections, however, did require patching and resurfacing.¹⁴⁷ As C. B. Petersen, senior engineering aide with District One of the Public Roads Administration (PRA), noted in his report regarding this aspect of the post-construction work, “considerable patching” was required at the highest elevations of the road because the “surface treatment [was] hardly adequate to withstand the severe conditions aggravated by the rapid thawing of the snow and the operation of heavy, chain equipped snow removal machinery in the spring.”¹⁴⁸

Additional work, contracted by the PRA to Charles Shannon of Butte, Montana, included producing aggregate for future surfacing projects and constructing an extension to a masonry retaining wall at Lake Creek (Station 2602). Here the turbulent waters of Lake Creek had scoured and undermined the wall. Construction workers carefully matched the new extension to the existing wall. At the park’s request, workers also placed a

¹⁴⁴ The McLaughlin company was one of seven to submit bids to the District 1 office of the BPR in Portland, Oregon in 1936. Other companies included: Woodward Construction Co. from Rock Springs, Wyoming, Taggart Construction Company of Cody, Wyoming, Charles Shannon of Butte, Montana, Nolen Brothers, Inc. and S. J. Groves and Sons—both from Minneapolis, and Olof Nelson from Logan, Utah. Petersen, Final Construction Report (1935-1938), Tabulation of Bids.

¹⁴⁵ J. M. Myers, Assistant Highway Engineer, Final Construction Report on Red Lodge-Cooke City Approach Road to Yellowstone National Park, Sections A & C, Bituminous Surfacing, March 15, 1938, 1-4 and Tabulation of Bids, Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado.

¹⁴⁶ Edmund B. Rogers, Superintendent, Yellowstone National Park, to W. H. Lynch, District Engineer, Bureau of Public Roads, Nov. 16, 1937, copy in, Final Construction Report on Red Lodge-Cooke City Approach Road to Yellowstone National Park, Sections A & C, Bituminous Surfacing, March 15, 1938, 1-4 and Tabulation of Bids, Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado.

¹⁴⁷ Petersen, Final Post Construction Report (1935-1938), 4-5.

¹⁴⁸ C. B. Petersen, Senior Engineering Aide, Final Post Construction Report (1938-1939) on Sections A, B, C, & D of the Red Lodge-Cooke City Approach Road to Yellowstone National Park, May 27, 1940, File 9: “1926-27; 1930; 1932-33; 1936-39; 1940; 1943-1953; Southwest Approach Road; Flood damage between Mammoth and Gardiner; crossings of Yellowstone River; Approach roads; Livingston-Gardiner Road and Bridge; surfacing and oiling; construction projects; Red Lodge-Cooke City Approach Road,” NARA-Yellowstone [hereinafter Petersen, Final Construction Report (1938-1939)]. As noted in the Summary Statement of Significance, by this time the BPR had been renamed the Public Roads Administration. This agency eventually became the Federal Highway Administration.

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guardrail along the extension, matching it to the rail already installed along the existing retaining wall.¹⁴⁹ By December of 1938, the contractor had finished all of the project, with the exception of cleaning up borrow pits and hauling some of the aggregate to Station 1518 (located atop the plateau near the east end of Section B). This remaining work was done during the 1939 season.¹⁵⁰

At the end of the two-year post-construction period, Petersen in a final post-construction report assessed the condition of the road by noting that given the “unusual weather conditions and construction problems encountered in building a highway with a maximum elevation of nearly 11,000 feet, the sixty miles of road has stood up very well.” Petersen further recognized that remaining work included “a great deal of slope stabilization and rounding of cut slopes.” Completing this work was necessary, in his view, before the road would “conform to the standards of present-day construction of park type highways.” He also acknowledged that the number of parking areas at scenic points was “somewhat limited” and that in many places additional cross drainage was needed. Finally, Petersen explained that, during 1938, a survey of these various conditions had been done, and he anticipated that a future contract to cover the costs of the additional work would be negotiated.¹⁵¹

In a subsequent report, prepared in 1942, Petersen characterized the traffic that by then was typically using the road. In addition to tourists going to and from the park, local residents sought “cooler recreation at the higher elevations” by driving on the road, and trucks hauled supplies, including gasoline, to Cooke City via the road. During the summer, the number of vehicles averaged 400 per day; on weekends and holidays this number spiked to roughly 1500. By 1942, the route was generally open between mid-May and mid-October. Petersen noted that heavy snow still blocked the road for the rest of the year and that no attempt had been made “to prolong the season of travel as the anticipated traffic would not be sufficient to justify the increase in cost.”¹⁵²

Funding the maintenance of the road persistently posed problems for the park service. Unfortunately for Yellowstone National Park, Section 5 of the Park Approaches Act, which authorized the Interior secretary to enter into agreements with state and county governments for the maintenance of approach roads, also charged the secretary to “maintain them when otherwise necessary.” As National Park Service Director Newton Drury explained to Montana Senator James Murray in May of 1942, “[f]unds have never been added to the [Interior Department] appropriation” for the Yellowstone National Park’s cost to administer, protect, and maintain the Red Lodge-Cooke City approach road. Drury further observed that the park service had “been able during the past few years to accomplish early spring snow removal on the Red Lodge-Cooke City section by setting up a post construction project, sponsored with roads and trails construction funds. The small balance of funds remaining for post construction on the road in question,” he added, “will enable the Public Roads Administration to carry on necessary slide removal and repair work during the coming travel season if the early

¹⁴⁹ L. A. Deklotz, Jr. Highway Engineer, Public Roads Administration, Final Construction Report (1938-1939) on Red Lodge-Cooke City, Yellowstone National Park Approach Road Section B, D, A (Portion), Bituminous Aggregate Production, March 25, 1940, 1-3, 11, Central Federal Lands Highway Division Archives, Federal Highway Administration, Denver, Colorado.

¹⁵⁰ *Ibid.*, 13.

¹⁵¹ Petersen, Final Post Construction Report (1935-1938), 5.

¹⁵² C. B. Petersen, Senior Engineer Aide, Final Post Construction Report Red Lodge-Cooke City Highway, Yellowstone National Park Approach Road Project, Sections A, B, C, & D (Acct Nos. 5285 & 6226), Snow Removal, Slide Removal & Correction & Bituminous Surface Repair, March 13, 1942, File 632: Post Construction Report on Sections A, B, C, & D of the Red Lodge-Cooke City Approach road to Yellowstone National Park, 1935-1942, in File 9, Box D8, NARA-Yellowstone.

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snow removal is not attempted.” Because of limited funding, Drury found it “highly improbable” that funds would be “available for normal post construction on the Red Lodge-Cooke City Approach Road after the 1942 season.” Drury stated moreover that this approach road was “one of the few projects of this category on which maintenance has not been assumed by the State in which the road is located.”¹⁵³

The issue of whether the National Park Service or the states of Montana and Wyoming would be responsible for maintaining the road and removing snow and slide material after this initial two-year post-construction period arose as early as August of 1932. After a meeting in Great Falls, Montana, with Montana State Highway Commissioner O. S. Warden, National Park Service Director Horace Albright relayed the substance of their discussions to Yellowstone Superintendent Roger Toll. Noting that the park service would be responsible for maintenance during the initial two-year post-construction period, Albright further stressed that, after that period, the state of Montana would have to assume that responsibility, even if it meant obtaining legislation to give Montana the authority to maintain the road in the segments that were located in Wyoming. He noted that “the road is a Montana approach to Yellowstone; that it was built on the insistence of Montana representatives and senators; that it is of no value to Wyoming and would constitute a serious precedent if we were to undertake the maintenance of the highway at the end of the two-year period following its completion.”¹⁵⁴

In another letter to Superintendent Toll, dated September 30, 1932, Albright additionally wrote that the State of Montana, in his view, would have to begin to maintain the road “not only as to the part lying in Montana but also as to that part lying in Wyoming, or the State can expect at the end of the two-year period when the project will be handled by the National Park Service that the road will be without any maintenance whatever.”¹⁵⁵

For his part, Montana State Highway Commissioner O. S. Warden thought that the federal government had “arranged for the construction of these approach roads to the Parks” without “due consideration as to . . . how maintenance may be carried on.” Warden noted as well that “[u]nder the present circumstances and laws it seems rather difficult for the [Montana] State Highway Commission to assume jurisdiction within national parks or the State of Wyoming.” But Warden optimistically added, “these matters must all be ironed out in some way” and “[t]here, of course, is some way out.”¹⁵⁶

Despite subsequent discussions with the Montana State Highway Commission and Warden’s optimism, no agreement regarding the state’s responsibility for road maintenance had been reached by August of 1934. National Park Service Chief Engineer F. A. Kittredge observed then that part of what distinguished the Red Lodge-Cooke City road from other approach roads is that it did not just carry traffic to and from the park but that it also served many other “important State [and] County needs.” Kittredge additionally contended, however, that “whether there is merit or not” in the argument that the park service should maintain all approach

¹⁵³ Newton B. Drury, Director, National Park Service, to James Murray, United States Senate, May 1, 1942, File 632: Roads Outside of Park (Red Lodge-Cooke City Approach) (Northeast), Part 3, Jan. 1, 1940 to Dec. 31, 1943, Box D83, NARA-Yellowstone.

¹⁵⁴ Horace Albright, Director, National Park Service, to Roger W. Toll, Superintendent, Yellowstone National Park, Aug. 23, 1932, File 1: “1933 Red Lodge-Cooke City Road Reports, (Part 2 of 2),” Box D40, NARA-Yellowstone.

¹⁵⁵ Horace Albright, Director, National Park Service, to Superintendent, Yellowstone National Park, Sept. 30, 1932, File 1: “1933 Red Lodge-Cooke City Road Reports (Part 1 of 2),” Box D40, NARA-Yellowstone.

¹⁵⁶ O. S. Warden, State of Montana Highway Commission, to Roger W. Toll, Superintendent, Yellowstone National Park, Sept. 7, 1932, File 1: “1933 Red Lodge-Cooke City Road Reports (Part 1 of 2),” Box D40, NARA-Yellowstone.

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roads because they were used primarily for travel to and from the national parks, it seemed quite likely to him that the park service would be “forced to maintain them.”¹⁵⁷

Kittredge was right. The park service continued to maintain the entirety of the Red Lodge-Cooke City road until the 1960s when an agreement was finally reached with the State of Montana for maintenance of a portion of the road. Obtaining funding to cover the costs of maintenance and snow removal remained difficult, even while residents of Red Lodge, Cooke City, and Billings clamored for earlier openings of the road. During World War II, however, funding was even more limited. In 1945, Park Superintendent Edmund Rogers explained to a Billings businessman that there had been “no appropriation made to provide funds for the opening or maintenance of the road since we became involved in the war. The only money that has been available,” Rogers continued, “is unexpended balances from other projects from appropriations made prior to our entry into the war.” By July of 1945, these limited funds, according to Rogers, were “rapidly disappearing.” Superintendent Rogers assured the businessman that the park service was “making every effort within its means to protect the highway from complete deterioration” until Congress could provide more adequate funding. Rogers explained further that because funding was so limited the priority for spending them was on the costs of maintenance in order to protect the investment of constructing the road rather than on expediting the opening of the road.¹⁵⁸

The Dude Ranchers’ Association of Montana joined the chorus of those wanting the park service to spend more on snow removal. In July of 1945, one of the association’s members, Walter Nye, wrote to Superintendent Rogers to question whether the park service’s efforts were enough to protect the investment in the road. Pointing out that damage had particularly resulted from melting snow running over the grade, Nye noted that “[t]o most people it seems just darn poor business to spend several millions on that road and then just leave it to its fate.”¹⁵⁹

Despite efforts in the late 1940s to reach a maintenance agreement with the State Highway Commission of Montana, the park service was still responsible for maintaining the Red Lodge-Cooke City approach road in the late 1950s.¹⁶⁰ By then, annual maintenance costs for such items as snow removal in the spring and after storms throughout the summer and early fall, seal coating and other routine maintenance was exceeding \$67,000.¹⁶¹ In 1960, negotiations to secure a maintenance agreement with both Montana and Wyoming resumed, but

¹⁵⁷ F. A. Kittredge, Chief Engineer, Branch of Engineering, National Park Service, to the Director, National Park Service, Aug. 17, 1934, File 155.1: “Highways, July 1, 1932 to Dec. 31, 1935,” Box D83, NARA-Yellowstone. During this period, the Public Roads Administration handled the snow removal and maintenance work with funding provided via the National Park Service’s roads and trails appropriations.

¹⁵⁸ Edmund Rogers, Superintendent, Yellowstone National Park, to F. G. Connelly, Connelly Machinery Company, Billings, Montana, July 2, 1945, File 632: Roads Outside of Park (Red Lodge-Cooke City Approach) (Northeast), Part 4, Jan. 1, 1944 to Dec. 1945, Box D83, NARA-Yellowstone.

¹⁵⁹ Walter C. Nye to Edmund Rogers, July 9, 1945, File 632: Roads Outside of Park (Red Lodge-Cooke City Approach) (Northeast), Part 4, Jan. 1, 1944 to Dec. 1945, Box D83, NARA-Yellowstone.

¹⁶⁰ Lemuel A. Garrison, Superintendent, Yellowstone National Park, to C. E. Cunningham, Secretary, State Highway Commission, Helena, Montana, Aug. 5, 1957; and for information about the negotiations in the late 1940s see Superintendent Edmund Rogers, Memorandum for the Regional Director, Region Two, Sept. 20, 1948, both in File 6: “1943-1960 Red Lodge-Cooke City Road Reports,” Box D40, NARA-Yellowstone.

¹⁶¹ Gerald A. Rowe, Park Engineer, to Assistant Superintendent, Yellowstone National Park, July 7, 1959, File 6: “1943-1960 Red Lodge-Cooke City Road Reports,” Box D40, NARA-Yellowstone.

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Wyoming officials held that until a road to Sunlight Basin was completed the state did not have a compelling interest in maintaining the portions of the Red Lodge-Cooke City road that were situated in Wyoming.¹⁶²

Intensifying the need to obtain cooperation from the states was the impact of increasing numbers of tourists using the road during the postwar period. By the early 1960s, much of the road needed significant repairs in addition to routine maintenance. Federal funding in the amount of \$350,000 provided to the State of Montana for the 1962 fiscal year, an amount that Montana pledged to match, allowed reconstruction and repair work to start during the 1962 construction season.¹⁶³ Montana has since used federal highway funding to maintain the section of the Red Lodge-Cooke City approach road from the east end of Red Lodge to the east Montana/Wyoming border crossing. The National Park Service, however, retains responsibility for maintaining the portion of the road from the park entrance, eastward to the Montana-Wyoming line at milepost 43.11.

With specific reference to the Red Lodge – Cooke City Approach Road, National Park Service Director Horace Albright's 1931 statement that "... the park approach road law is not likely to bring the National Park Service anything but trouble..." seems especially prescient.¹⁶⁴ Of the twelve roads built with funding authorized under the Park Approaches Act of 1931, by 1946 the park service had maintenance agreements with the states for all but the Red Lodge – Cooke City Approach Road.¹⁶⁵

Modifications to the Road during the Post-Historic Period

By the 1960s, elements of the Red Lodge – Cooke City Approach Road were in poor condition, especially the original log guardrails and the timber bridges, as well as some sections of the grade. Between 1963 and 1965, most of the timber bridges were replaced, including those over Index Creek, Fox Creek, Clarks Fork Yellowstone River, and Crazy Creek in Wyoming and the Rock Creek Bridge in Montana. By the late 1960s, the Federal Highway Administration had begun the reconstruction of a portion of the road in Wyoming, specifically, the area between the Montana/Wyoming state line just east of Colter Pass, east to the vicinity of the Beartooth Road Camp, the park service's maintenance facility. Work included rebuilding and widening the grade along its original alignment, improving drainage structures, and paving. In a few areas, sharp curves into and out of drainages were eliminated by the construction of elevated fill segments; in the process two of the original concrete and stone bridges, the Muddy Creek Bridge and the Gilbert Creek Bridge, were abandoned. Both bridges were removed, as was the surfacing material on the abandoned road sections leading to the bridges. Similarly, in 1974, the original Lake Creek Bridge was abandoned, when a new 406-foot-long steel girder bridge was constructed slightly downstream from the original. However, in this instance the original bridge was left in place. The remainder of the road in Wyoming received little attention other than resurfacing

¹⁶² Luis A. Gastellum, Acting Superintendent, Yellowstone National Park, to Regional Director, Region Two, March 7, 1960, File 6: "1943-1960 Red Lodge-Cooke City Road Reports," Box D40, NARA-Yellowstone.

¹⁶³ Lemuel A. Garrison, Superintendent, Yellowstone National Park, to Director, Sept. 22, 1961, File: Superintendent's Annual Reports, Yellowstone National Park Library, Gardiner, Montana.

¹⁶⁴ Horace Albright, Director of the National Park Service to Hon. Robert D. Carey, United States Senate, February 6, 1931, File 9: "1926-27; 1930; 1932-33; 1936-39; 1940; 1943-1953; Southwest Approach Road; Flood damage between Mammoth and Gardiner; crossings of Yellowstone River; Approach roads; Livingston-Gardiner Road and Bridge; surfacing and oiling; construction projects; Red Lodge-Cooke City Approach Road," Box D8, NARA-Yellowstone.

¹⁶⁵ Hillory A. Tolson, Acting Director of the National Park Service to W. E. Pierce, Secretary, Red Lodge Commercial Club, November 27, 1946, File 6: "194301960 Red Lodge – Cooke City Road Reports," Box D40, NARA-Yellowstone.

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and replacement of the original log guardrails with steel structures. Reconstruction of this section of road (identified in Section 7 of this document as Segment 4) began in 2004

Rehabilitation and reconstruction of Segment 4 of the road continued in 2009 under the Central Federal Lands Division of the Federal Highway Administration when the portion of road from Clay Butte to the Montana state line was completed. In 2010 through 2011 the segment of road between Little Bear Creek West to west of Beartooth Creek was reconstructed and the two historic bridges were replaced with modern bridges. In 2013, a small segment of roadway on either side of Long Lake Bridge was reconstructed to accommodate a longer, wider reconstructed Long Lake Bridge. Although the new bridge is in the same location, and has the same low profile and stone masonry clad abutments, the new bridge and new masonry retaining walls present a much larger structure than the original Long Lake Bridge.

Work on the Montana sections of the road concentrated on the portion of the road on the north side of the plateau, specifically the switchbacks above the Rock Creek drainage during the first half of the 1960s. This work included widening of the grade, improving drainage structures and repaving. The Montana state highway program has sponsored some safety improvement projects (guardrail replacement), and recently, the Rock Creek Vista overlook has been redesigned and expanded. Until recently, work on the Montana segment at the west end of the road near the park entrance had been limited to the 1982 replacement of the Sheep Creek Bridge, the last of the original timber bridges. In 2004, however, Western Federal Lands Highway Division (WFLHD) began reconstruction of a portion of the road east of Cooke City.¹⁶⁶

Summary

The building of the Red Lodge – Cooke City Approach Road had far-reaching effects in a number of realms. From the standpoint of transportation engineering, the successful application of the BPR's standards, coupled with the aesthetic considerations of the National Park Service's Landscape Division, produced a road that largely preserved the landscape through which it was built. Working together, representatives from the park service and the forest service created management guidelines for adjacent lands that contributed to preservation of the scenic qualities of the road corridor. Built through extremely difficult terrain, the relative successes and failures of the various contractors illustrate the necessity of integrating sound construction management with an understanding of technological limitations.

The completion of the road allowed forest service managers to plan and develop new recreation facilities such as campgrounds and backcountry trails for people accessing the area for the first time in their own automobiles. As for the communities of Red Lodge and Cooke City, the completion of the road started both on a path towards tourism-based economies. Their location along a new approach road to Yellowstone National Park virtually assured both communities of a steady stream of tourists in need of accommodations, meals, and gasoline. Completion of the road also benefited the park, increasing its visitation markedly.¹⁶⁷ Although some

¹⁶⁶ U.S. Department of Transportation, Federal Highway Administration, Western Federal Lands Highway Division. *Beartooth Highway Road Inventory and Needs Study, Mile Post 0.0 to Mile Post 68.7*, 1994.

¹⁶⁷ In anticipation of completion of the approach road, the park undertook the construction of a new entrance station just inside the park boundary, near the west end of the new road. The construction included a check station for incoming and outgoing traffic, as well as a residence for the ranger. Completed in 1935, both buildings are of rustic log construction, the style that came to typify administrative and concession buildings in national parks throughout the west. In 1987 the Northeast Entrance station was designated a National Historic Landmark under the Architecture in the Parks National Historic Landmark Theme Study. Laura Soulliere

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aspects of road management and maintenance remain contentious to this day, by most standards, its completion achieved the goals of its promoters.

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Park County, WY

**Page 64 Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT,
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Central Federal Lands Highway Division, Denver, Colorado.

Western Federal Lands Highway Division, Vancouver, Washington.

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Interview with George Otten, conducted by Barbara Smith-Steiner. July 20, 2004.

Section 10. Geographical Data, continued:

UTM References

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Zone	Easting			Northing			Zone	Easting			Northing				
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7	12	6	12	378	49	77	610	12	12	6	24	152	49	87	786
Zone	Easting			Northing			Zone	Easting			Northing				
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Verbal Boundary Description

The historic district begins at milepost 0 and ends at milepost 60. For most of the distance through this corridor, the boundary of the Red Lodge – Cooke City Approach Road Historic District incorporates a 500-foot-wide swath of land centered over the original centerline of the road. Exceptions to the 500-foot-wide corridor include the segments of the road that transect lands patented by private individuals prior to the withdrawal. Besides one homestead located in Wyoming, private lands are mainly located in Montana, in the area between Cooke City and the Northeast Entrance Station to Yellowstone National Park. The width of the corridor through private lands is 100 feet centered over the original centerline. In addition, the boundary is expanded in several areas to incorporate the locations of material source areas and associated access roads. (See map sheets in additional documentation.)

Boundary Justification

The 500-foot-wide corridor through public (i.e., national forest) lands corresponds to the area withdrawn from the public domain under Executive Order 5945 signed in 1932. The intent of the order was to protect the scenic values of the road corridor by prohibiting roadside commercial and residential development. The narrower corridor through private lands reflects the width recommended by BPR engineers when various agencies were first negotiating road rights-of-way through private land.

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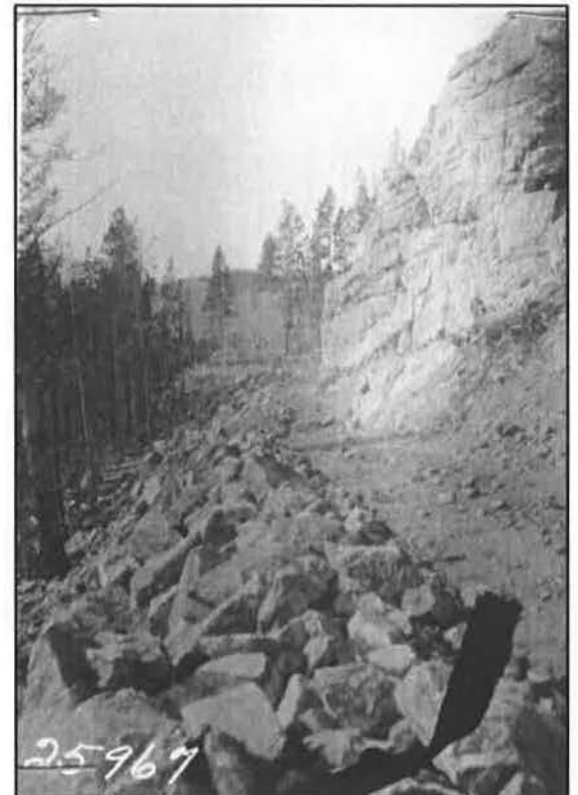
Historical Photographs



“The first camp at Muddy Creek in 1931.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 24446 from page 19.

“Showing a sample of the 1931 tote road at Station 2450.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 25967 from page 19.

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“Making the fill at Station 2266 with caterpillars and scrappers.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 24445 from page 20A.



“Ripper and 60-caterpillar tearing up frozen common material. This 6-inch crust froze in the four hours intervening between the night and day shift.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 24443 from page 20A.

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“Mr. Albright, Director of National Parks, and party making inspection in 1932.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 25972 from page 22. The landform behind the party is Beartooth Butte.

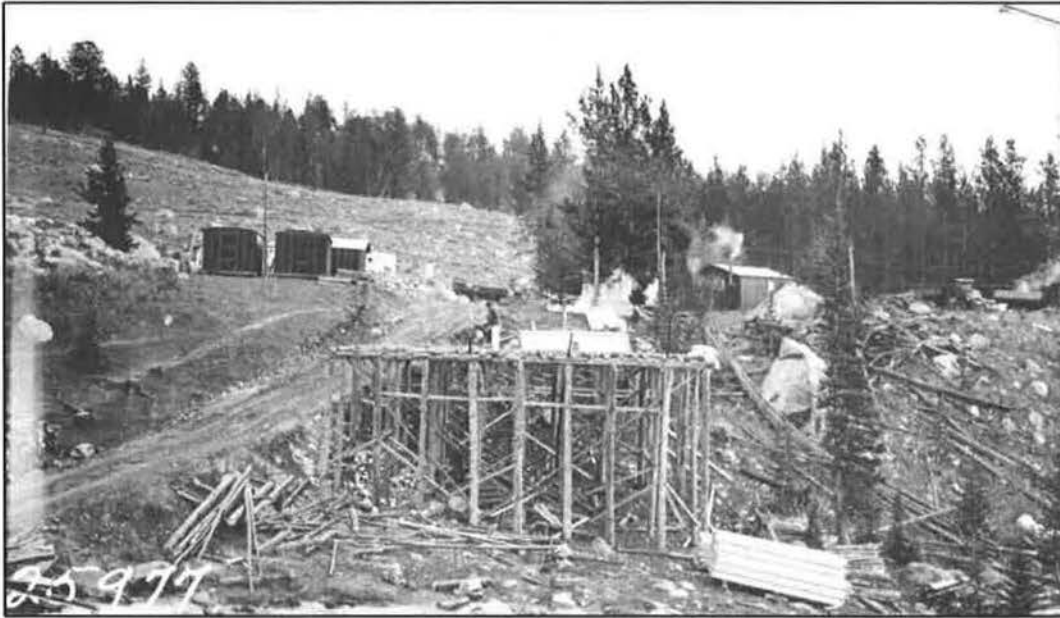


“One of the sub-contractor's shovels on April 15, 1932.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 25974 from page 23.

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“Preparing for the construction of the Muddy Creek Bridge.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 25977 from page 24.



“Muddy Creek Bridge showing concrete abutments with stone facing.” Final Construction Report (1931-1933) on Section B, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 25979 from page 25.

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“Roadway view over Rock Creek culvert at Station 2730.” Final Construction Report (1932-1934) on Section D, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 26054 from page 8.



“End view of Rock Creek culvert.” Final Construction Report (1932-1934) on Section D, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 26055 from page 8.

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“Cattle pass at Sta. 2889+50.” This cattle pass was located adjacent to a private ranch. Final Construction Report (1932-1934) on Section D, Grading Red Lodge-Cooke City Approach Road to Yellowstone National Park, H. E. Mitchell, 1934. Photo No. 26056 from page 10.



“Side view of Rock Creek Bridge at Station 486.” Final Construction Report (1932-1933) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, E- Section C, Grading E-Sections A and C, Surfacing. H. E. Mitchell, 1934. Photo No. 25732 from page 7.

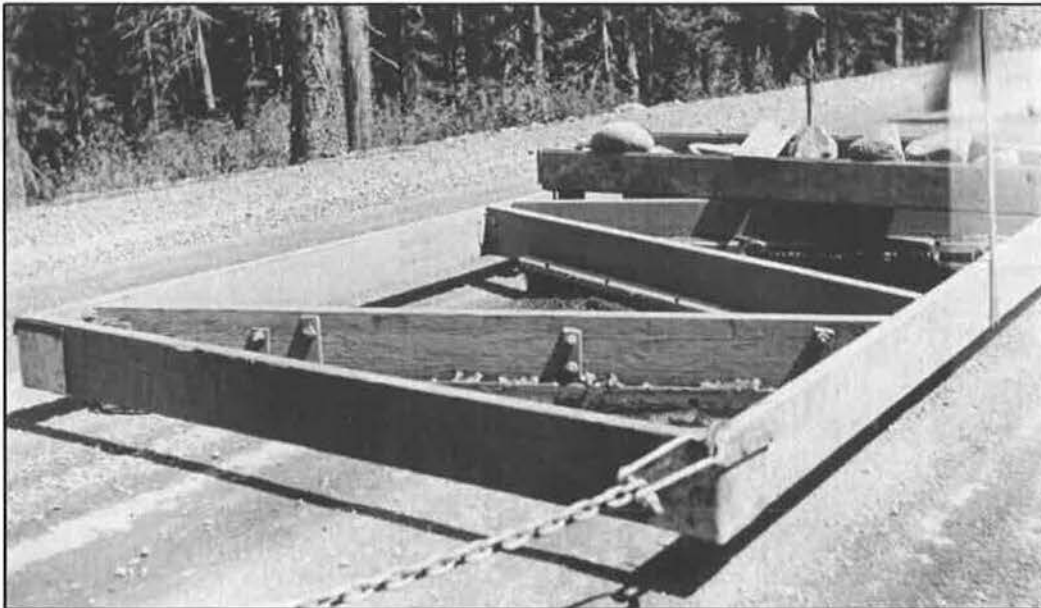
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“Showing abutments, side logs and handrail on Rock Creek Bridge at Station 486.” Final Construction Report (1932-1933) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, E-Section C, Grading E-Sections A and C, Surfacing. H. E. Mitchell, 1934. Photo No. 25733 from page 7.



“Small drag with one strike-off blade and three wire brushes used for maintenance of cover material on surface treatment.” Final Construction Report (1935-1936) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix. L. A. Deklotz, 1936. Photo No. 29134 from page 4.

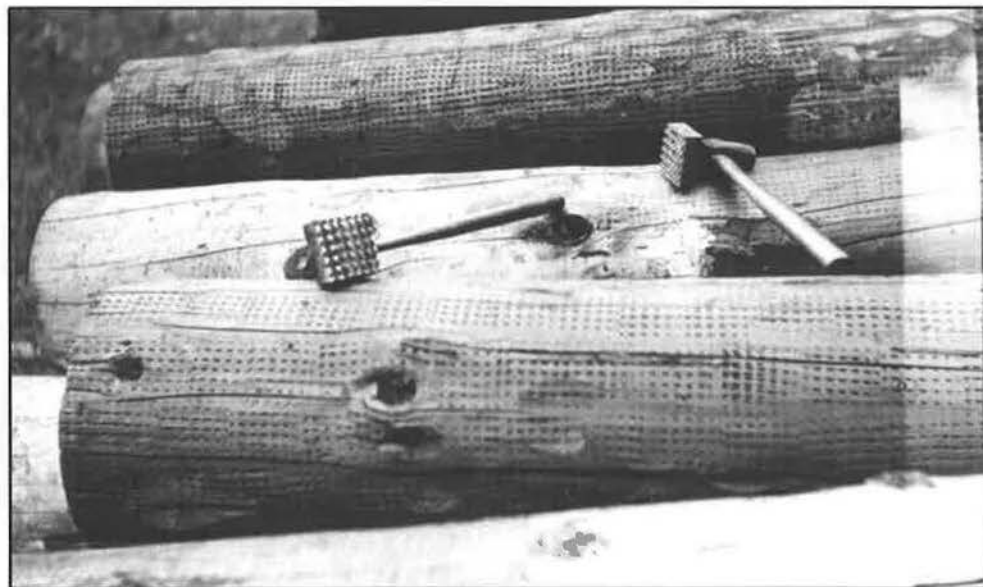
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“Processing road mix in Cooke City.” Final Construction Report (1935-1936) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix. L. A. Deklotz, 1936. Photo No. 29131 from page 5.



“Incised and treated guard rail posts and incising sledges. Sledges have 3/8" teeth on 3" square faces and weigh about six pounds.” Final Construction Report (1935-1936) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, on Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix. L. A. Deklotz, 1936. Photo No. 29309 from page 6.

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“Plant for treating guard rail posts. Steam from boiler on left was used to heat the creosote to the required temperature.” Final Construction Report (1935-1936) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, on Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix. L. A. Deklotz, 1936. Photo No. 29306 from page 7.



“Historical interest sign erected by Montana State Highway Commission near the western entrance of Cooke.” Final Construction Report (1935-1936) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, on Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix. L. A. Deklotz, 1936. Photo No. 29310 from page 10.

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“Looking east thru Cooke City at Sta. 3430+00.” Final Construction Report (1935-1936) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, on Section D (Portion), Surfacing, Bituminous Base Treatment and Bituminous Road Mix. L. A. Deklotz, 1936. Photo No. 29846 from page 15.



“Showing guardrail and bituminous mat during the curing process.” Final Construction Report (1933-1935) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, on Section A, B, C, Portion D Bituminous Surface Treatment. H. E. Mitchell, 1935. Photo No. 29706 from page 9.

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“Looking toward Cooke from Stuart's Ranch on Section Portion of D at Station 2780 after surfacing was laid.” Final Construction Report (1934-1935) on Red Lodge-Cooke City Approach Road to Yellowstone National Park, on Section B and Portion of D Surfacing. H. E. Mitchell, 1935. Photo No. 29145 from page 1.

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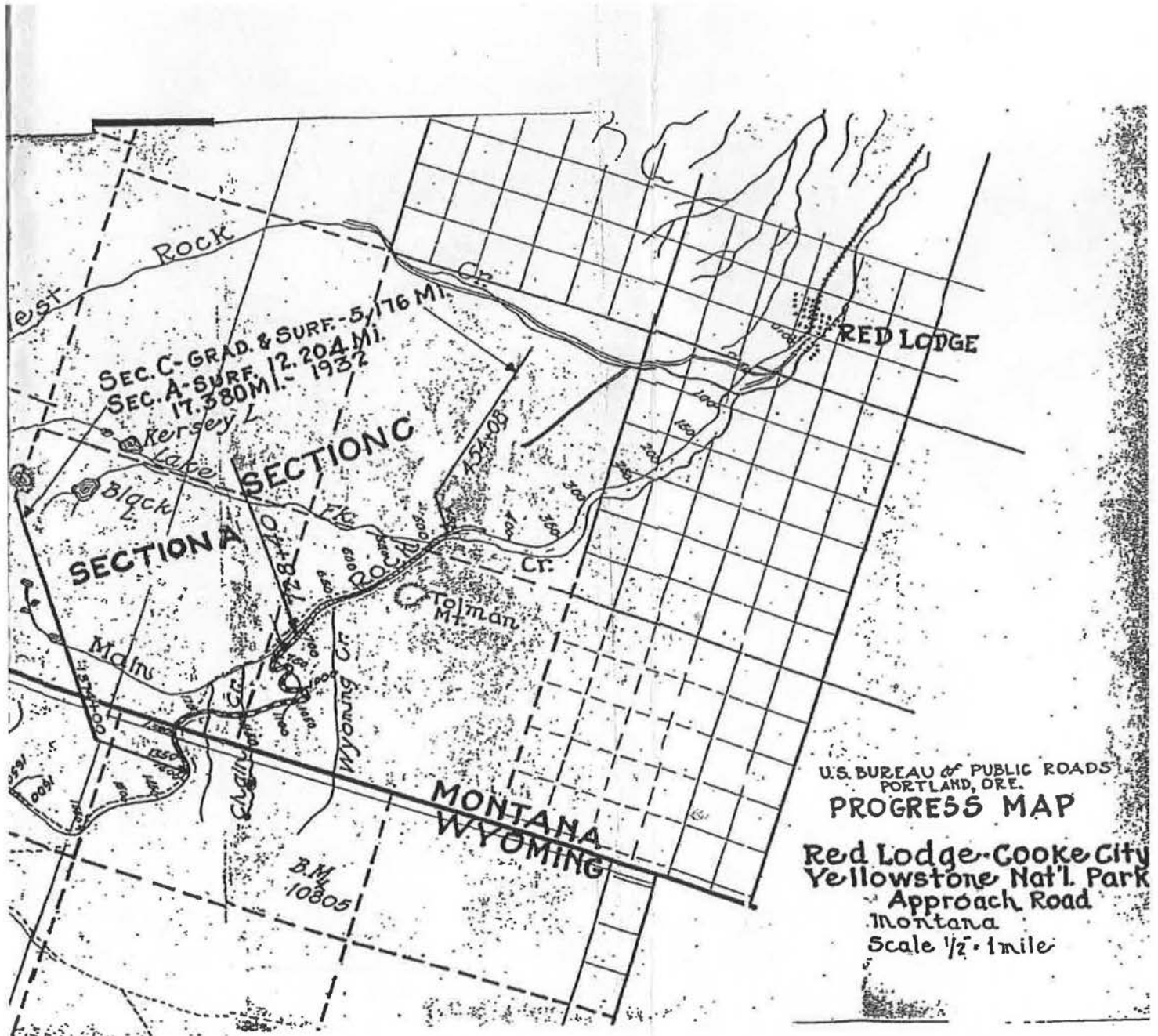
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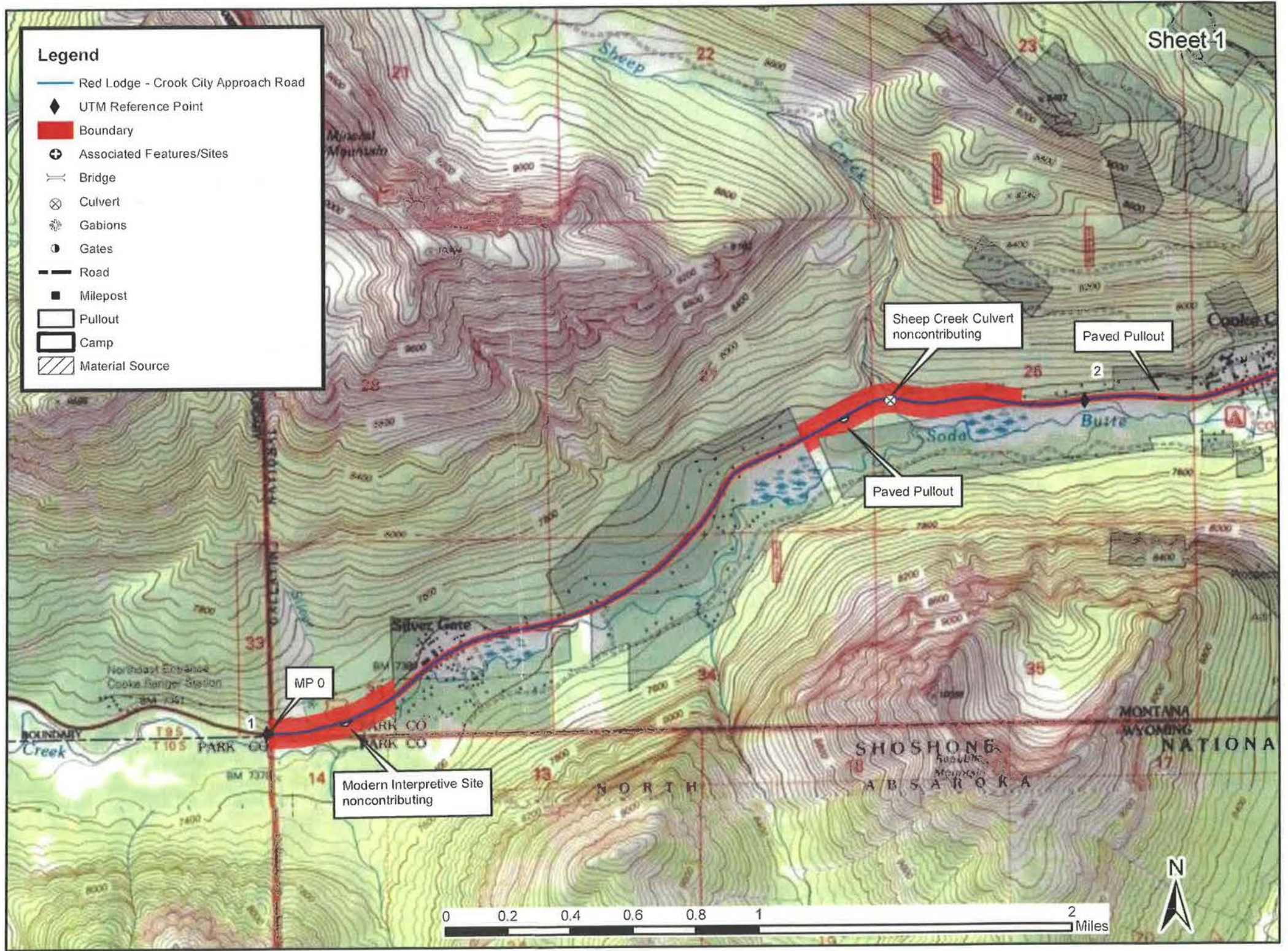


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Red Lodge--Cooke City Approach Road Historical District
Name of Property
Carbon and Park counties, MT and Park County, WY
County and State

Name of multiple listing (if applicable) _____



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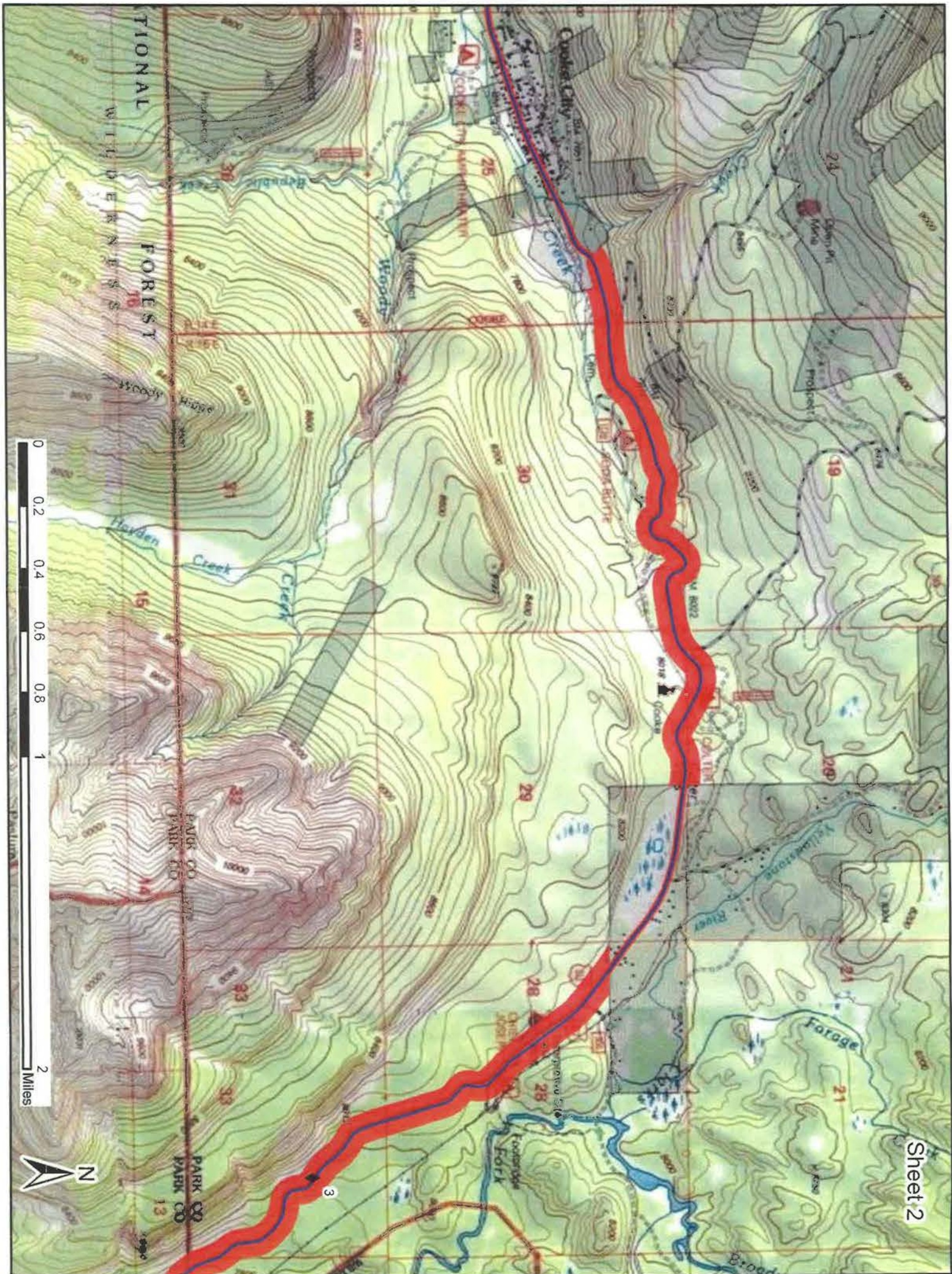
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Red Lodge--Cooke City Approach Road Historical District

Name of Property

Carbon and Park counties, MT and Park County, WY
County and State

Name of multiple listing (if applicable)



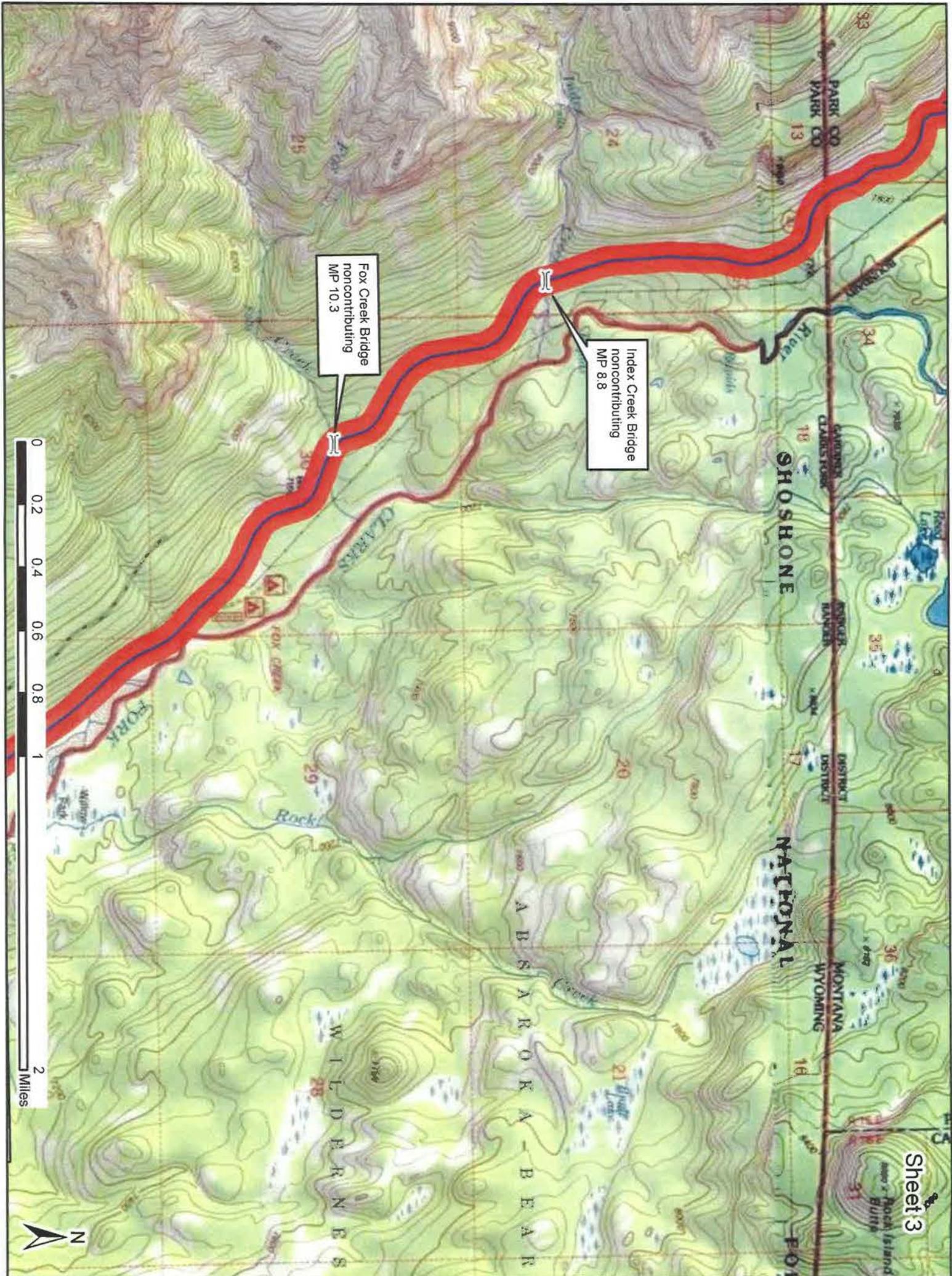
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Red Lodge--Cooke City Approach Road Historical District
Name of Property

Carbon and Park counties, MT and Park County, WY
County and State

Name of multiple listing (if applicable)

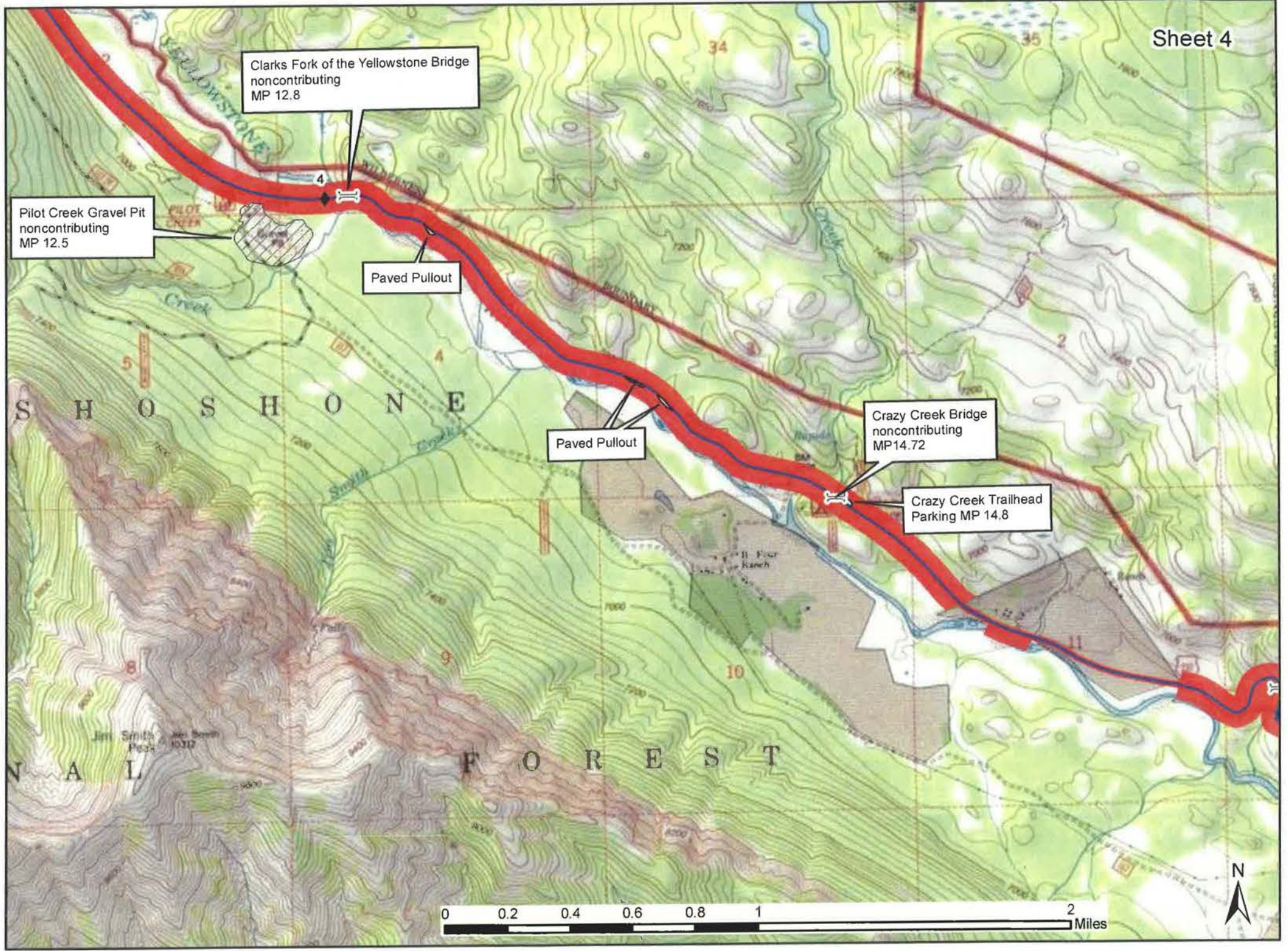


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Red Lodge--Cooke City Approach Road Historical District
Name of Property
Carbon and Park counties, MT and Park County, WY
County and State

Name of multiple listing (if applicable)



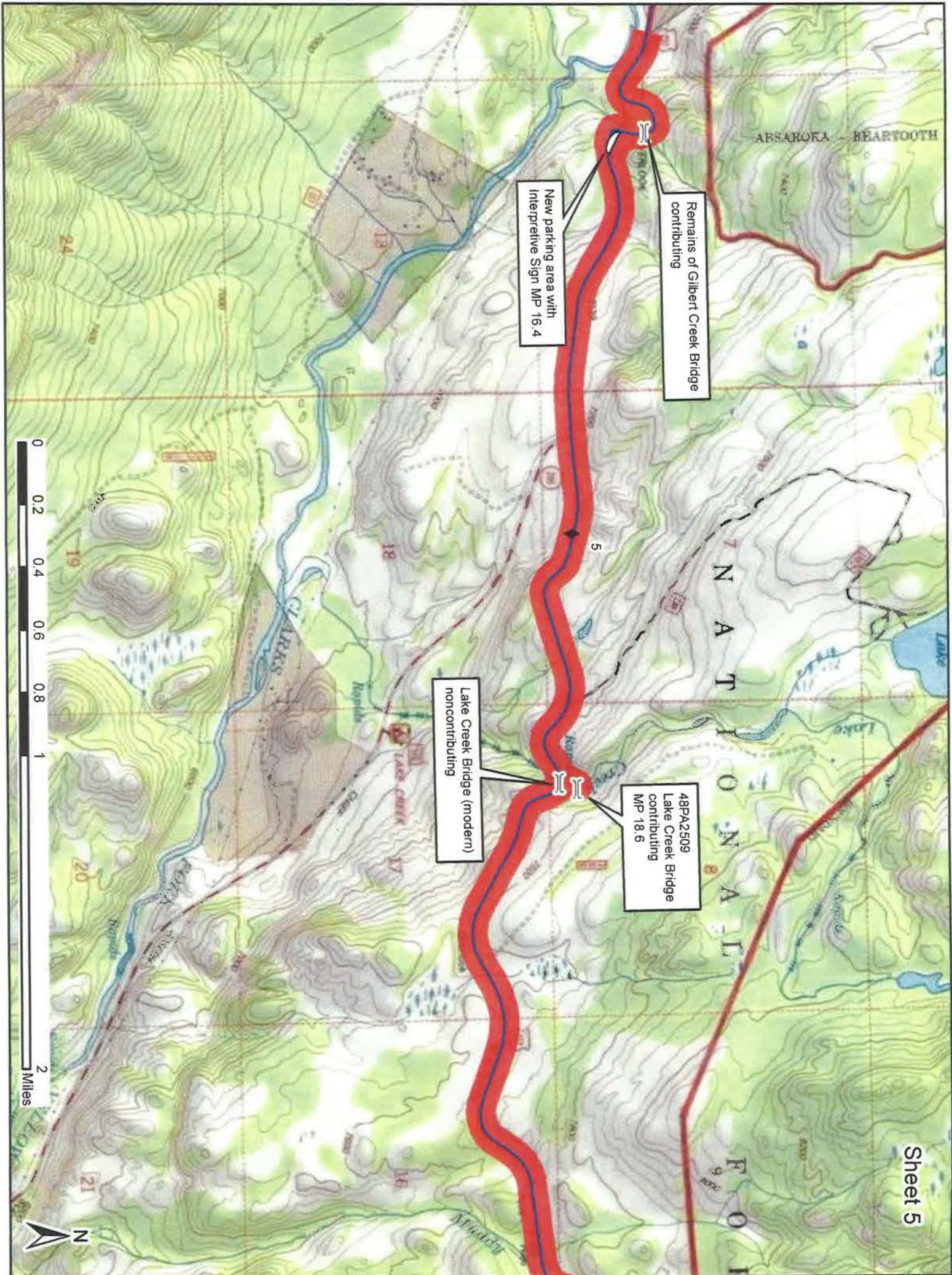
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Red Lodge--Cooke City Approach Road Historical District
Name of Property

Carbon and Park counties, MT and Park County, WY
County and State

Name of multiple listing (if applicable)

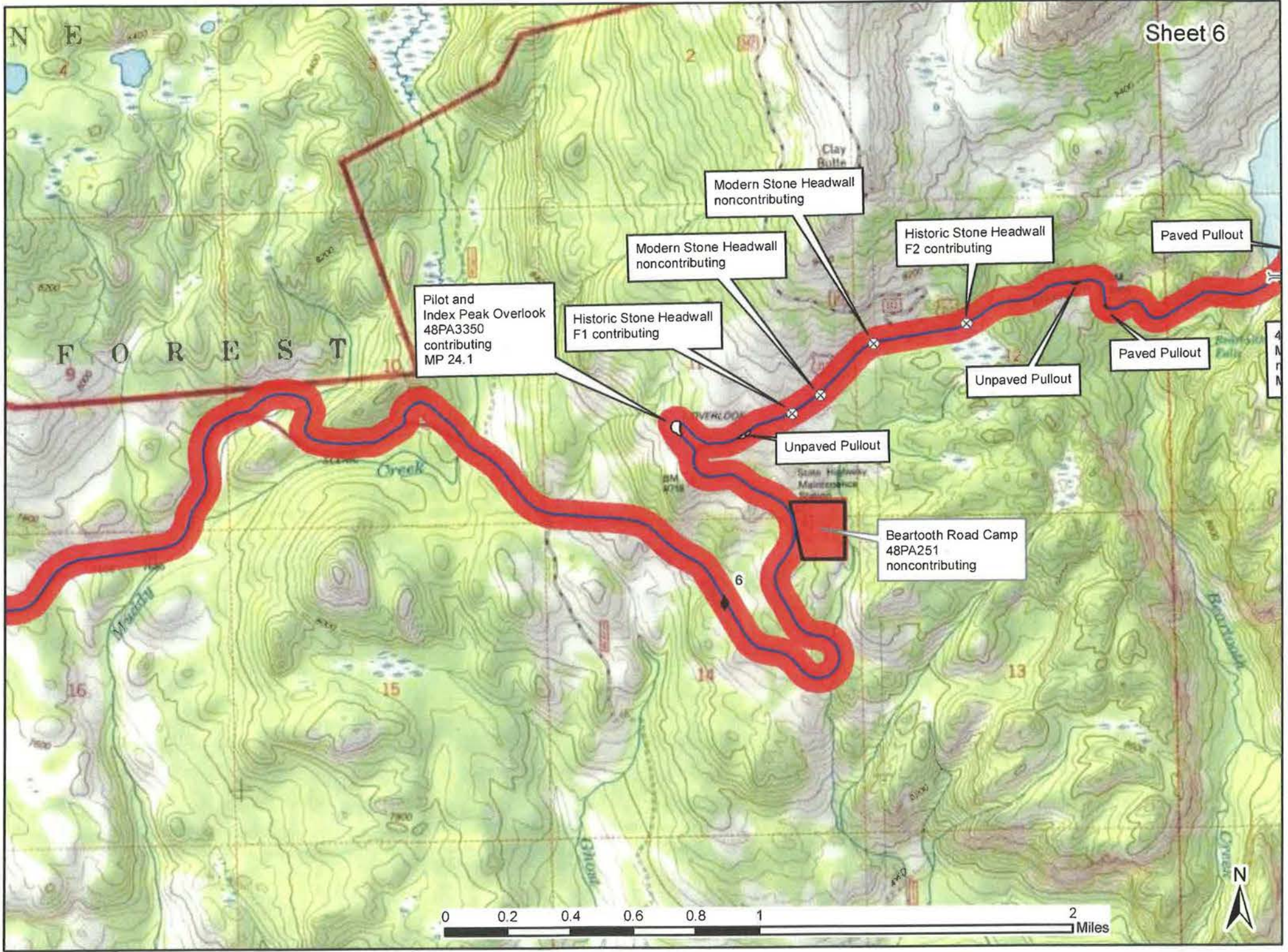


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Red Lodge--Cooke City Approach Road Historical District
Name of Property
Carbon and Park counties, MT and Park County, WY
County and State

Name of multiple listing (if applicable) _____



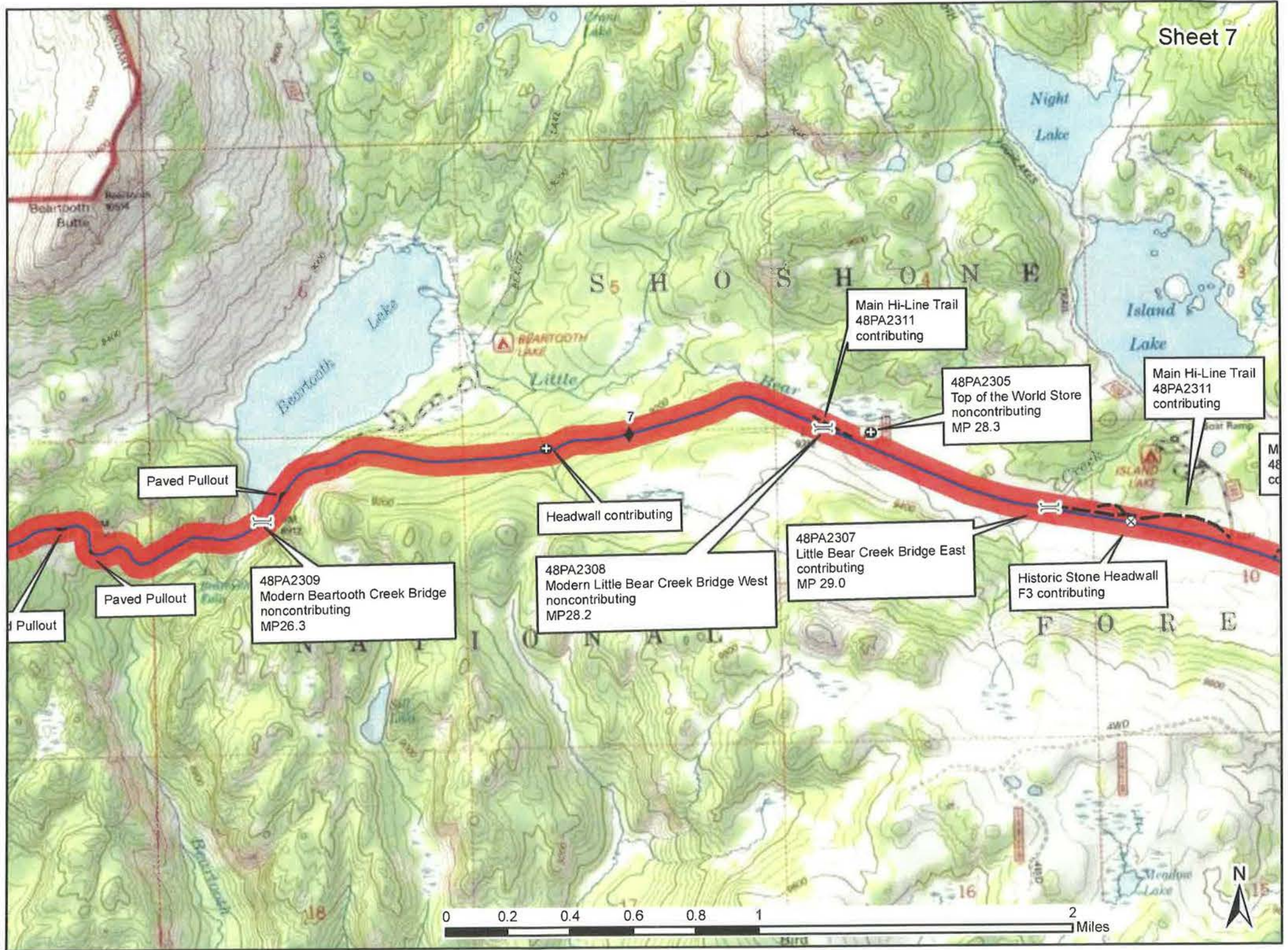
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Red Lodge--Cooke City Approach Road Historical District
Name of Property

Carbon and Park counties, MT and Park County, WY
County and State

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Name of multiple listing (if applicable) _____



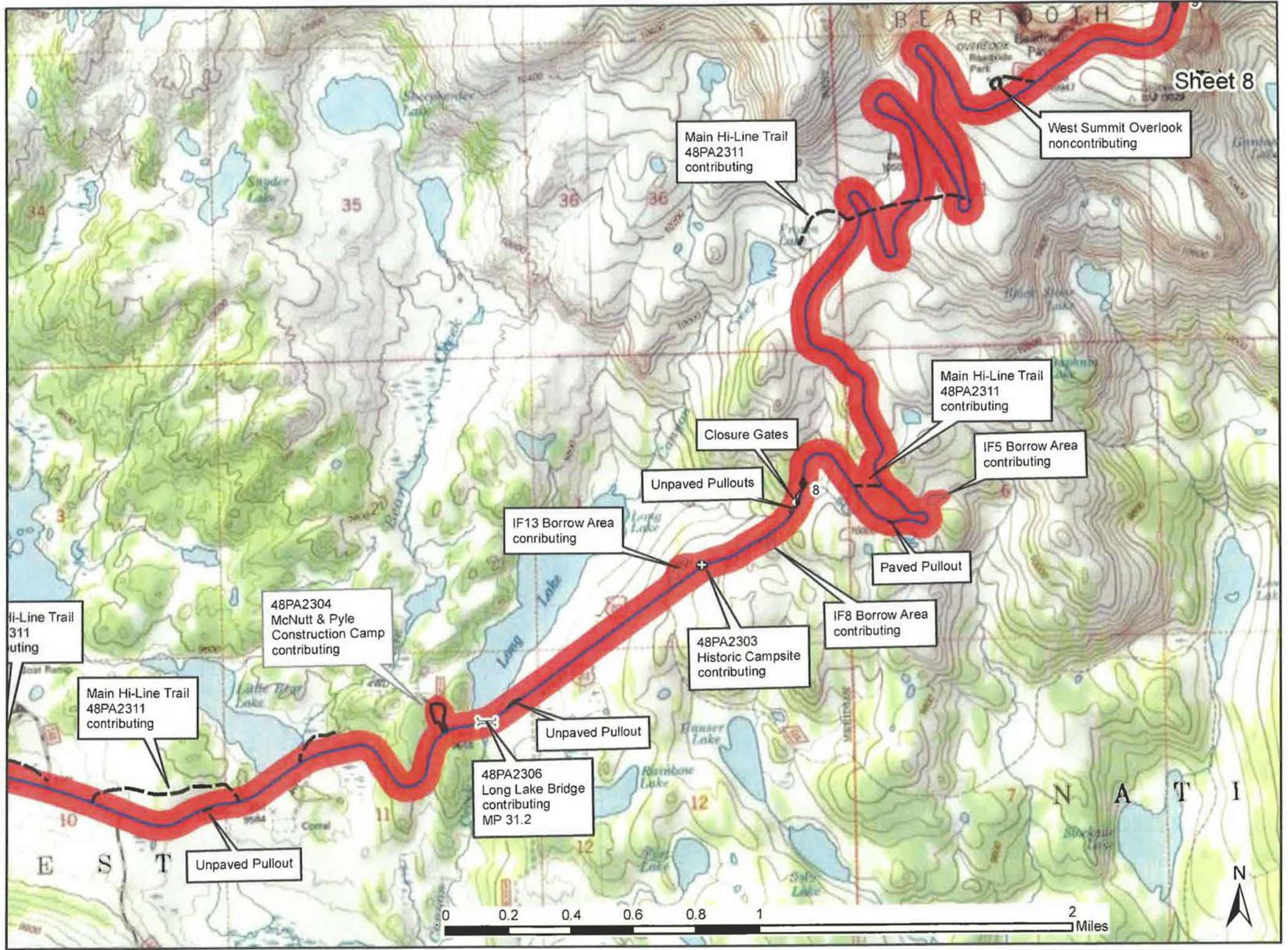
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Red Lodge--Cooke City Approach Road Historical District
 Name of Property

Carbon and Park counties, MT and Park County, WY
 County and State

 Name of multiple listing (if applicable)

Section number 12 Page 89

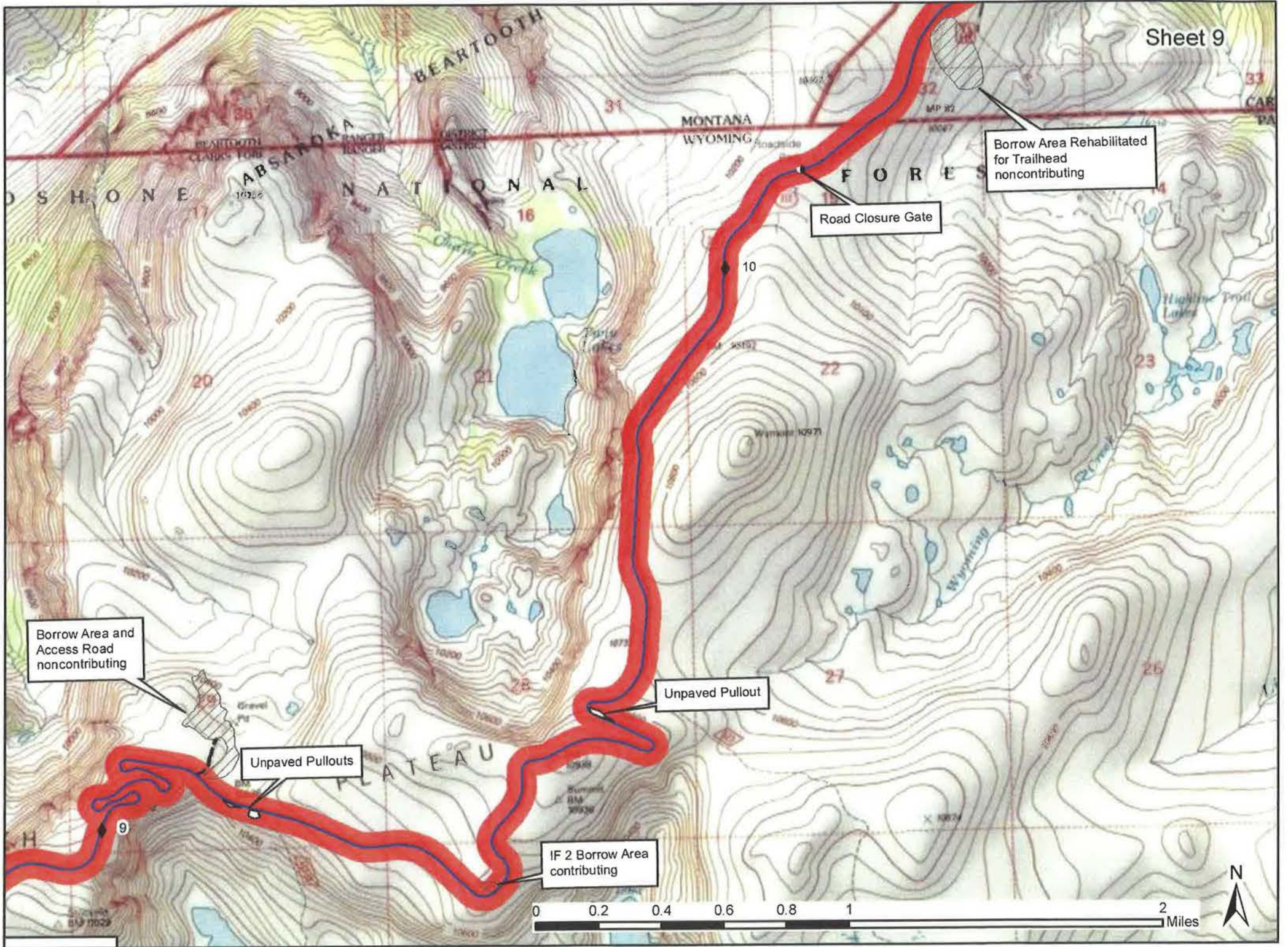


United States Department of the Interior
National Park Service
National Register of Historic Places
Additional Documentation - Maps

Red Lodge--Cooke City Approach Road Historical District
Name of Property
Carbon and Park counties, MT and Park County, WY
County and State

Section number 12 Page 90

Name of multiple listing (if applicable)

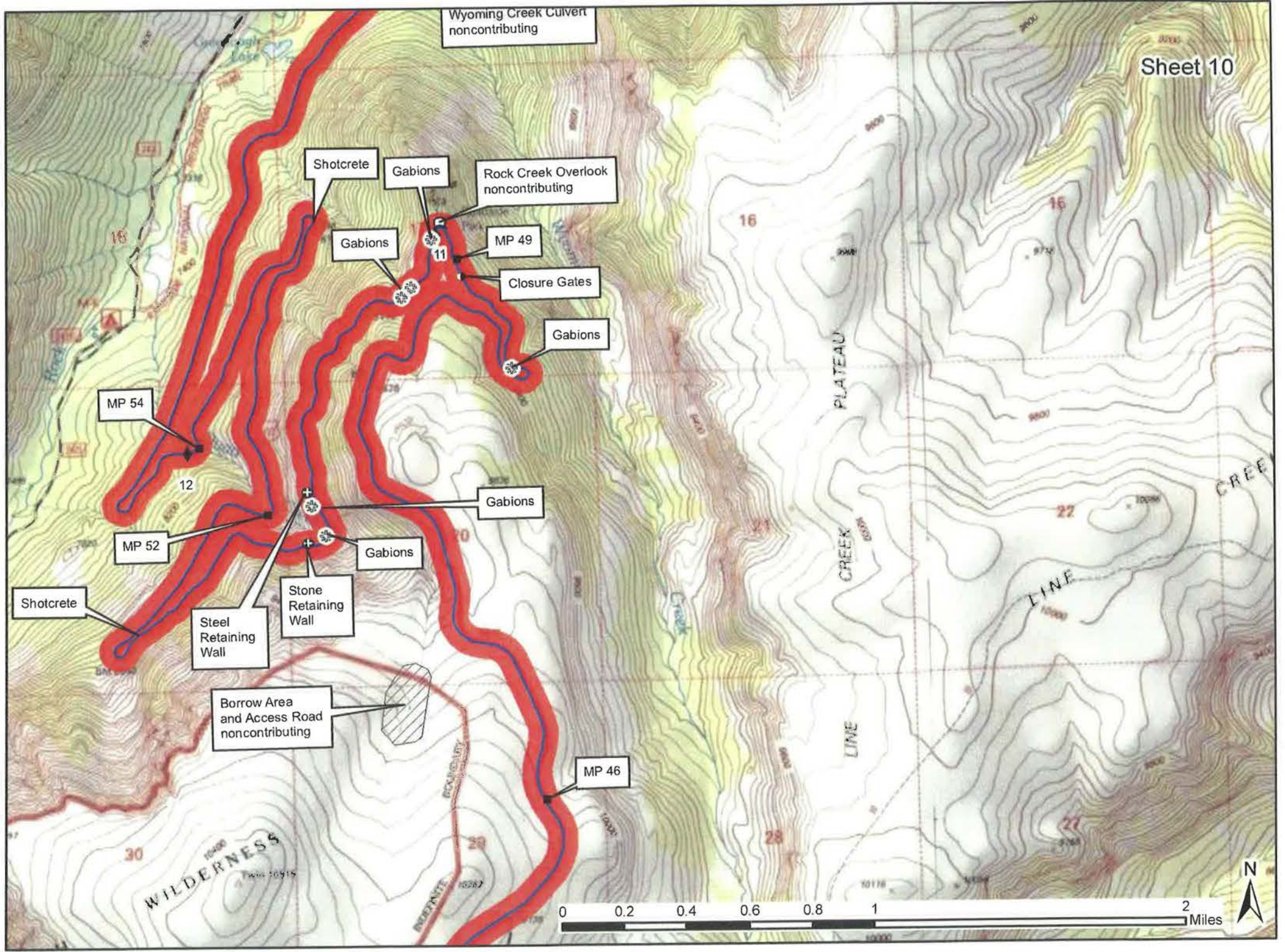


United States Department of the Interior
National Park Service
National Register of Historic Places
Additional Documentation - Maps

Red Lodge--Cooke City Approach Road Historical District
 Name of Property
Carbon and Park counties, MT and Park County, WY
 County and State

Section number 12 Page 91

Name of multiple listing (if applicable)



United States Department of the Interior

National Park Service

National Register of Historic Places

Additional Documentation - Maps

Section number 12 Page 92

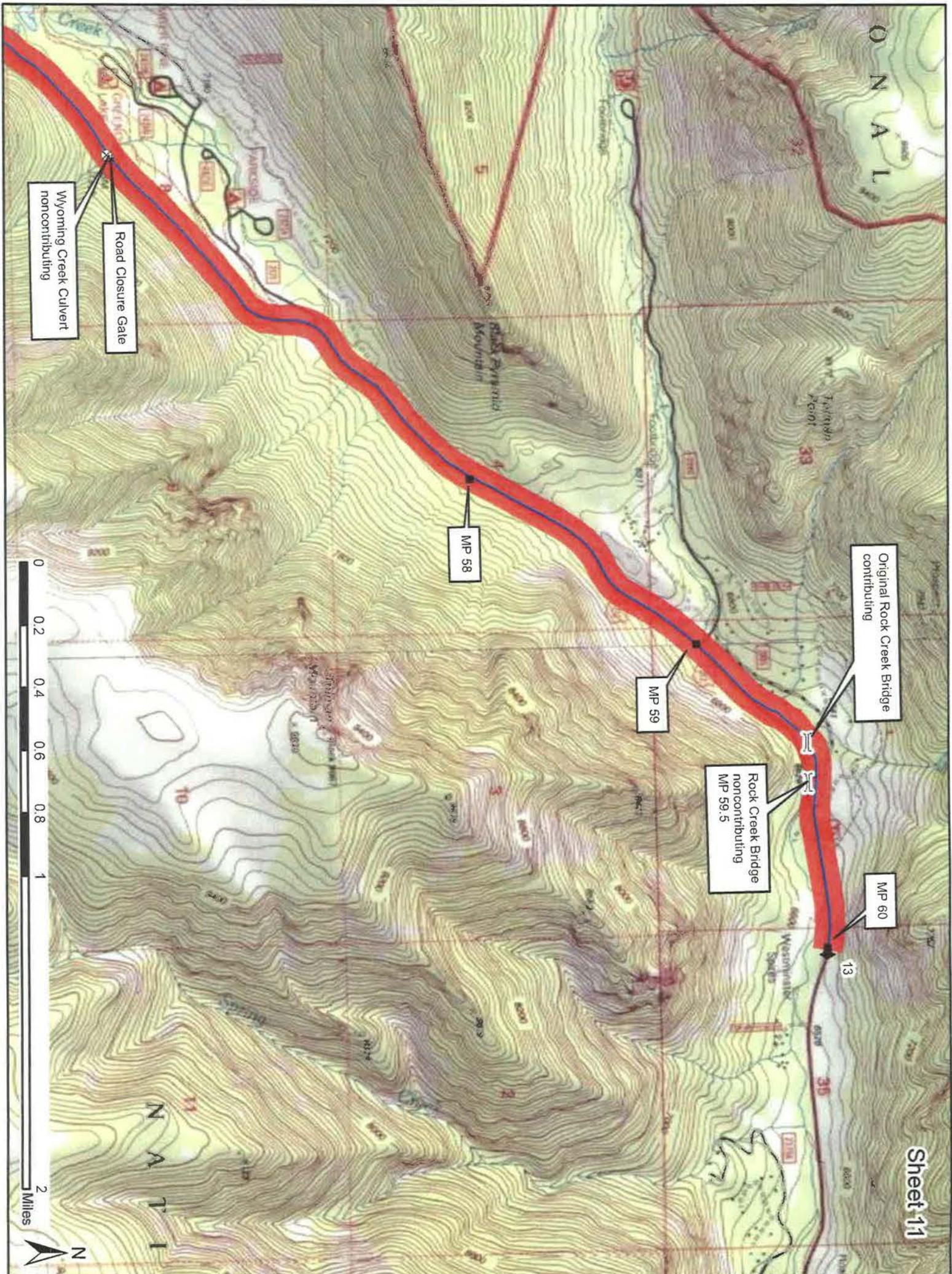
Red Lodge--Cooke City Approach Road Historical District

Name of Property

Carbon and Park counties, MT and Park County, WY

County and State

Name of multiple listing (if applicable)



United States Department of the Interior
National Park Service
National Register of Historic Places
Additional Documentation - Maps

Section number 12 Page 93

SKETCH MAP

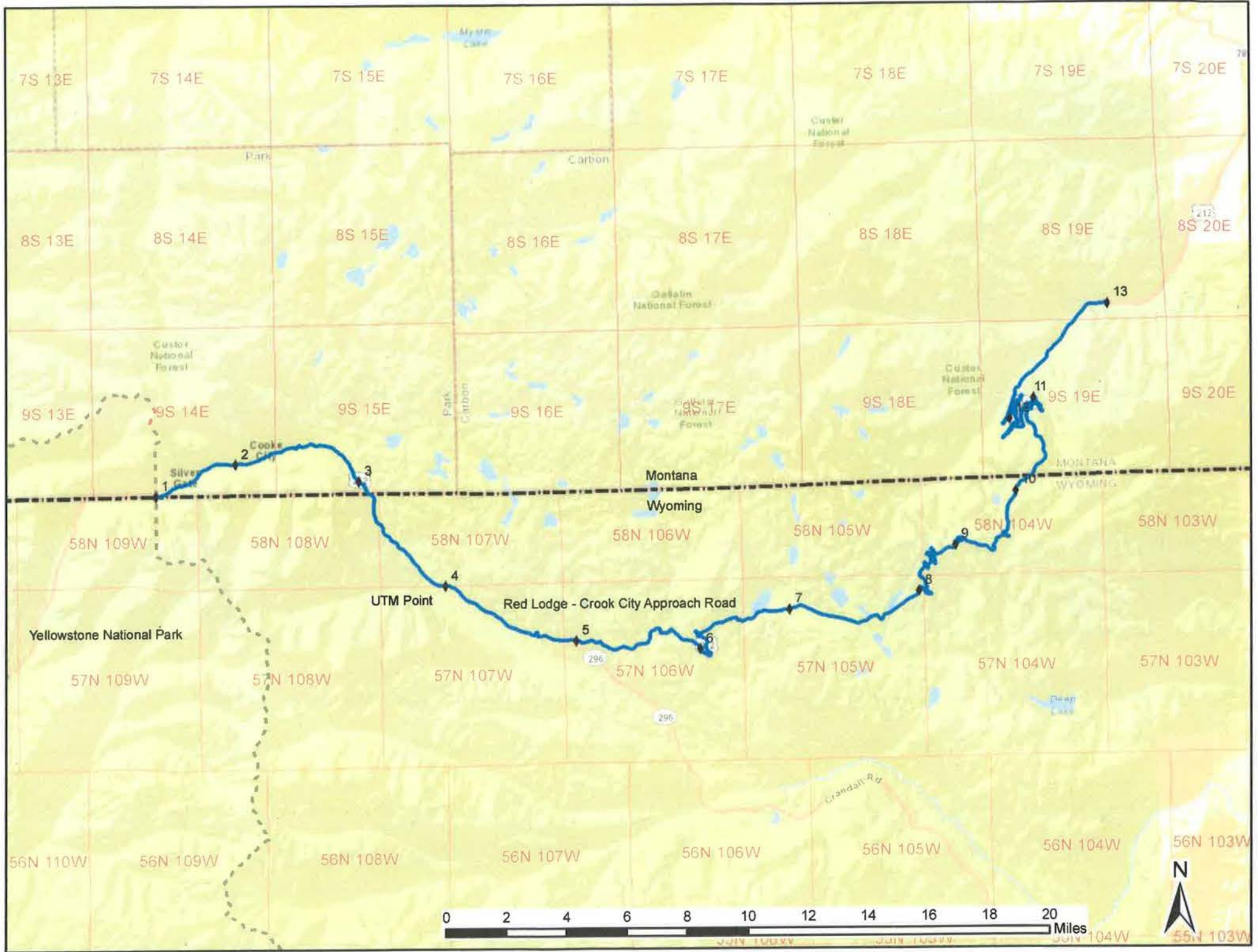
Red Lodge--Cooke City Approach Road Historical District

Name of Property

Carbon and Park counties, MT and Park County, WY

County and State

Name of multiple listing (if applicable)



**United States Department of the Interior
National Park Service**

**NATIONAL REGISTER OF HISTORIC PLACES
Continuation Sheet**

Section Number Additional Documentation Page ~~47~~ Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT, Park County, WY

PHOTOGRAPHS

Red Lodge – Cooke City Approach Road Historic District: Carbon and Park Counties Montana, and Park County, Wyoming

All Photographs Taken In Large Format By Richard Collier, Wyoming State Historic Preservation Office Photographer

All Photographs Taken August 21, 22, and 23, 2012

All Negatives Stored at the Wyoming State Historic Preservation Office, Cheyenne, Wyoming

Photograph View Description
Number

1. SSE Beartooth Highway (US HWY 212) 45th Parallel, Entering Wyoming Sign Park County, Wyoming
2. SE Crazy Creek Campground entrance, located approximately 3.5 miles west of the intersection of US HWY 212 and Wyoming State Route 296 in Park County, Wyoming
3. NE Beartooth Highway (US HWY 212) Lake Creek Bridge (48PA2509) located across Lake Creek on the original road bed, Park County, Wyoming
4. W Beartooth Highway (US HWY 212) Lake Creek Bridge (48PA2509) located at Lake Creek on the original road bed, Park County, Wyoming
5. E Beartooth Highway (US HWY 212) Approach road to Lake Creek Bridge (48PA2509), original road bed located east of Lake Creek Bridge
6. N Beartooth Highway (US HWY 212), (48PA2510) Road Camp located in Park County, Wyoming
7. E Beartooth Highway (US HWY 212) Pilot and Index Peak Overlook original road bed switchback, Park County, Wyoming
8. W Beartooth Highway (US HWY 212) Little Yosemite segment of Beartooth Highway, Park County, Wyoming
9. E Beartooth Highway (US HWY 212) Little Yosemite segment of Beartooth Highway, Park County, Wyoming

**United States Department of the Interior
National Park Service**

**NATIONAL REGISTER OF HISTORIC PLACES
Continuation Sheet**

Section Number Additional Documentation Page 95 Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT, Park County, WY

10. E Beartooth Highway (US HWY 212) Little Yosemite segment of Beartooth Highway, Park County, Wyoming
11. W Beartooth Highway (US HWY 212) Little Yosemite segment, Park County, Wyoming
12. S Beartooth Highway (US HWY 212) Little Bear Creek Bridge (East) (48PA2307), Park County, Wyoming
13. NE Beartooth Highway (US HWY 212) Tote Road, McNutt & Pyle Construction Camp (48PA2304) located near mile marker 31, Park County, Wyoming
14. W Beartooth Highway (US HWY 212) Long Lake Bridge (48PA2306), Park County, Wyoming
15. NNW Beartooth Highway (US HWY 212) Long Lake Bridge (48PA2306) Park County, Wyoming
16. N Beartooth Highway (US HWY 212) Main Hi-Line Trail (48PA2311) located approximately .1 mile east of Top of the World Store, Park County, Wyoming
17. NE Beartooth Highway (US HWY 212) Hi-Line Trail near Island Lake Campground, Park County, Wyoming
18. SE Beartooth Highway (US HWY 212) Main Hi-Line Trail south of the West Summit Overlook, Park County, Wyoming
19. NE Beartooth Highway (US HWY 212) Hi-Line Trail near Frozen Lake, Park County, Wyoming
20. N Beartooth Highway (US HWY 212) Section of highway south of West Summit Overlook, Park County, Wyoming
21. SW Beartooth Highway (US HWY 212) view taken from West Summit Overlook, Park County, Wyoming
22. WSW Beartooth Highway (US HWY 212) view of highway from Beartooth Pass Overlook, Park County, Wyoming
23. N Beartooth Highway (US HWY 212) Hellroaring Plateau View located on the north side of Beartooth Highway, Park County, Wyoming
24. NE Beartooth Highway (US HWY 212) road fill, Park County, Wyoming
25. W Beartooth Highway (US HWY 212) Fill, Crown of Road located in Park County, Wyoming

**United States Department of the Interior
National Park Service**

**NATIONAL REGISTER OF HISTORIC PLACES
Continuation Sheet**

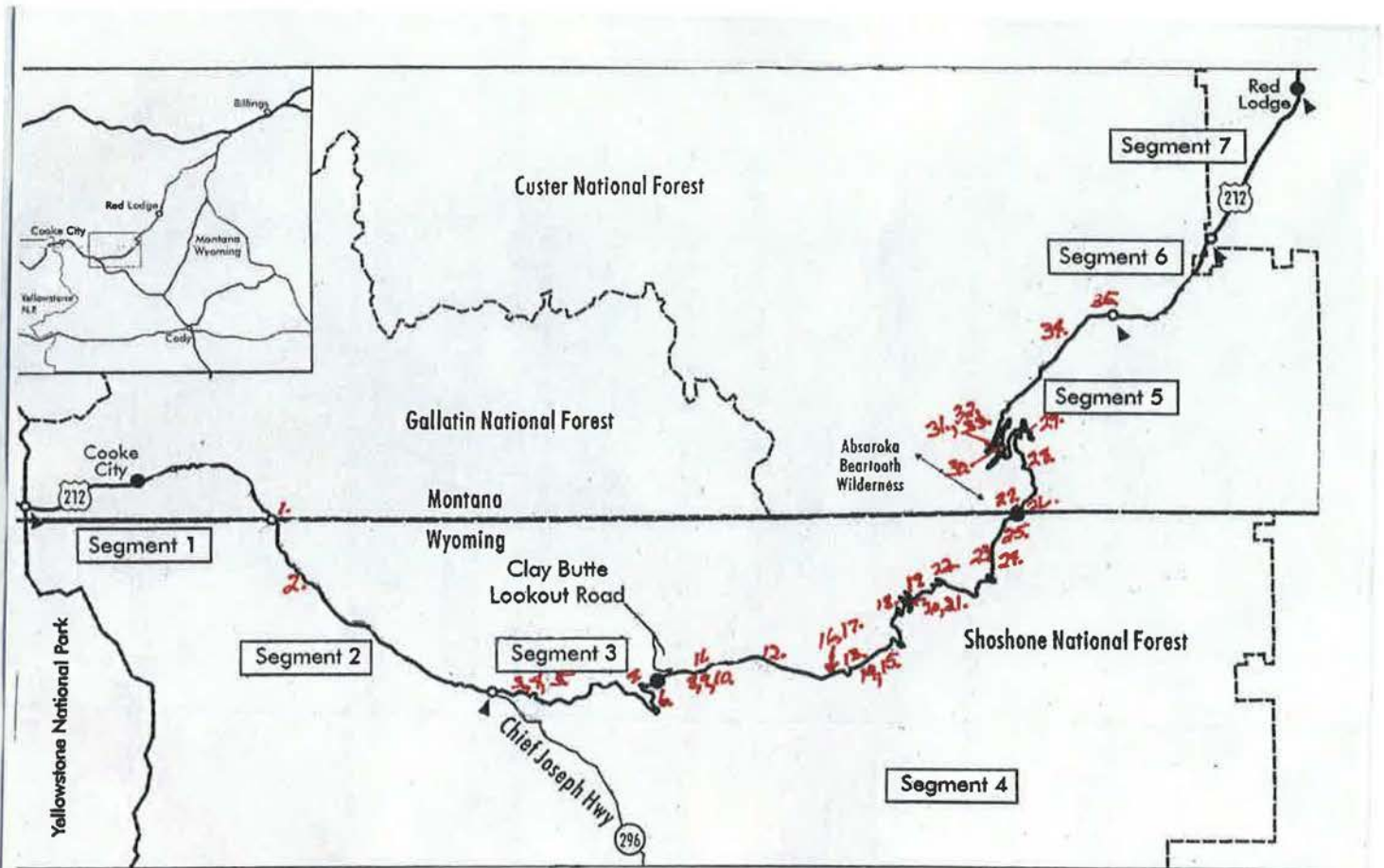
Section Number Additional Documentation Page 96 Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT, Park County, WY

26. SW Beartooth Highway (US HWY 212) start of Section 5 and end of Section 4, located at mile post 45, Carbon County, Montana
27. N Beartooth Highway (US HWY 212) fill-borrow pit in Carbon County, Montana
28. SW Beartooth Highway (US HWY 212) view of switchbacks on Montana side shot from top of slide area, Carbon County, Montana
29. NE Beartooth Highway (US HWY 212) rock slide area located on Montana side of the Beartooth Highway, Carbon County, Montana
30. W Beartooth Highway (US HWY 212) stone retaining wall located near mile marker 51, Carbon County, Montana
31. NE Beartooth Highway (US HWY 212) view from turnout at Montana mile marker 51, Carbon County, Montana
32. NE Beartooth Highway (US HWY 212) turnout between mile marker 52 and mile marker 51, Carbon County, Montana
33. NE Beartooth Highway (US HWY 212) view from turnout at mile marker 51-52, Carbon County, Montana
34. SW Beartooth Highway (US HWY 212) Rock Creek Bridge abutment from original road bed, located across Rock Creek under Beartooth Highway, Carbon, County, Montana
35. SW Beartooth Highway (US HWY 212) mile marker 60, Carbon County, Montana, east end of Red Lodge-Cooke city Approach Road Historic District

United States Department of the Interior
National Park Service

NATIONAL REGISTER OF HISTORIC PLACES
Continuation Sheet

Section Number Additional Documentation Page **41** Red Lodge – Cooke City Approach Road Historic District: Carbon and Park counties, MT, Park County, WY



MAP OF PHOTOGRAPH LOCATIONS BY PHOTOGRAPH NUMBER

Cut and Paste to Continuation Sheet 12. Additional Documentation Photographs

Red Lodge – Cooke City Approach Road Historic District: Carbon and Park Counties Montana, and Park County, Wyoming

All Photographs Taken By Richard Collier, Wyoming State Historic Preservation Office
Photographer

All Photographs Taken August 21 - 23, 2012

All Negatives Stored at the Wyoming State Historic Preservation Office, Cheyenne, Wyoming

Photograph Number	View	Description
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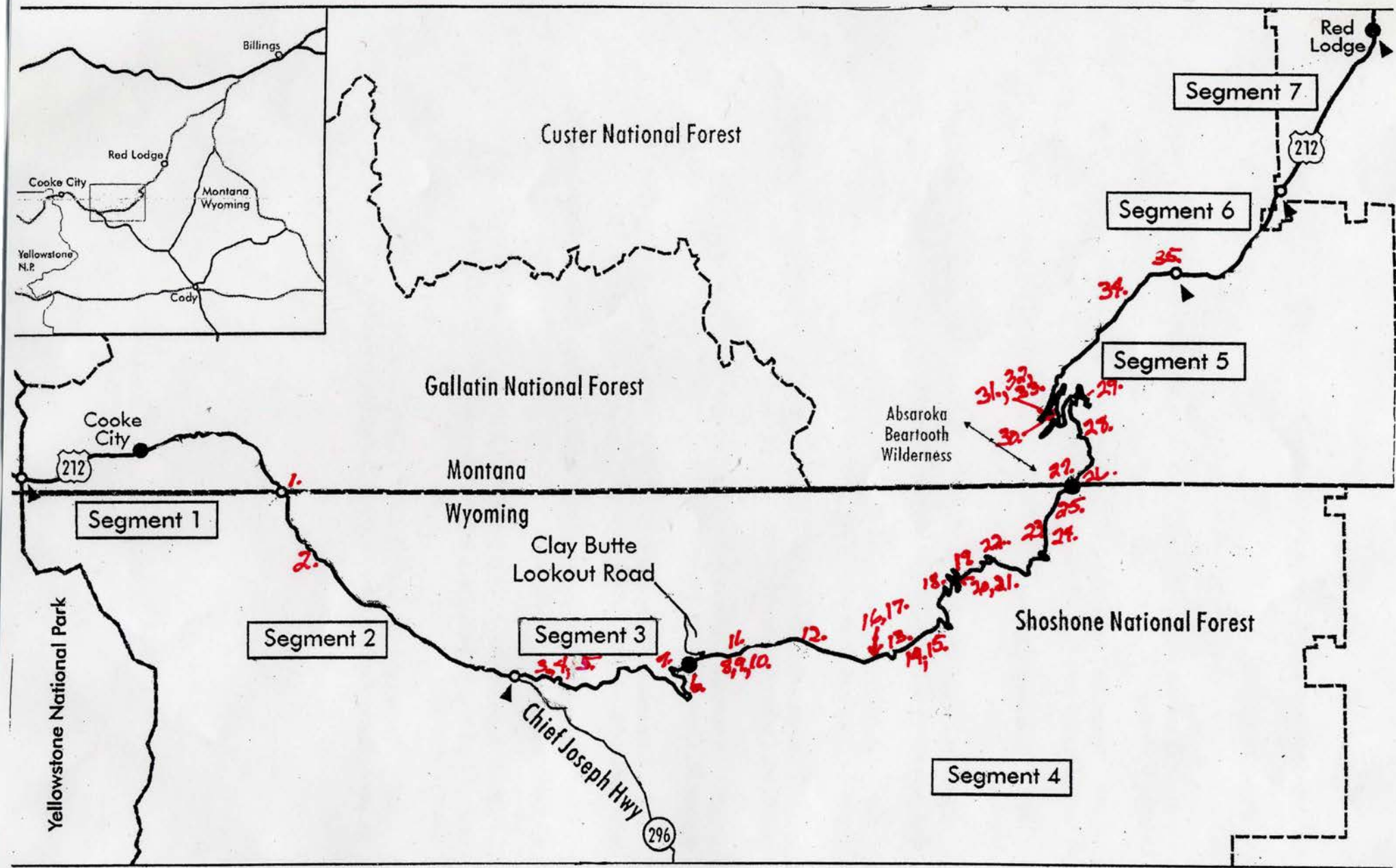
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10. E Beartooth Highway (US HWY 212) Little Yosemite segment of Beartooth Highway, Park County, Wyoming

Continuation Sheet 12. Additional Documentation Photographs

Photograph Number	View	Description
11.	W	Beartooth Highway (US HWY 212) Little Yosemite segment, Park County, Wyoming
12.	S	Beartooth Highway (US HWY 212) Little Bear Creek Bridge (East) (48PA2307), Park County, Wyoming
13.	NE	Beartooth Highway (US HWY 212) Tote Road, NcNutt & Pyle Construction Camp (48PA2304) located near mile marker 31, Park County, Wyoming
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Continuation Sheet 12. Additional Documentation Photographs

Photograph Number	View	Description
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35.	SW	Beartooth Highway (US HWY 212) mile marker 60, Carbon County, Montana, east end of Red Lodge-Cooke city Approach Road Historic District



MAP OF PHOTOGRAPH LOCATIONS BY PHOTOGRAPH NUMBER

1.



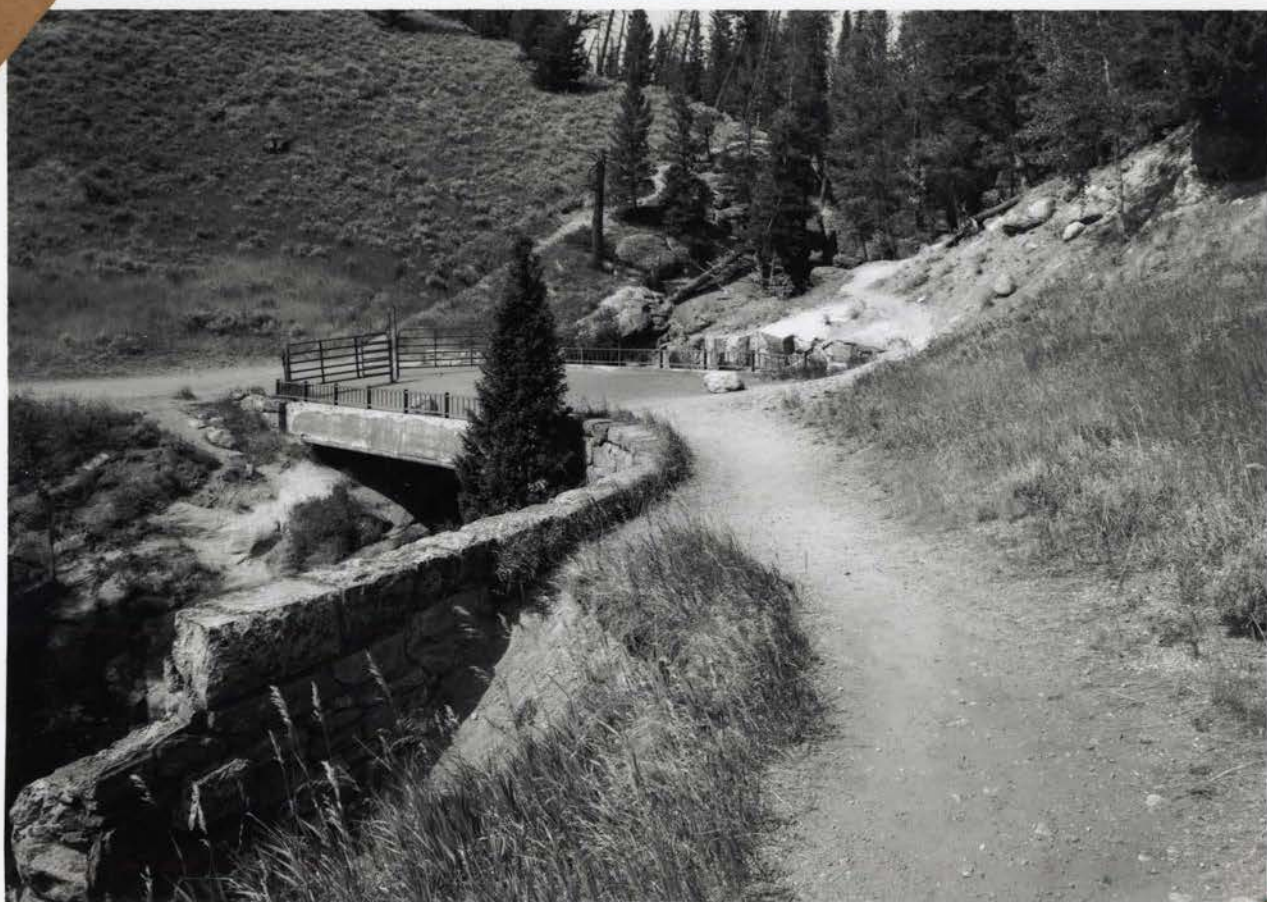
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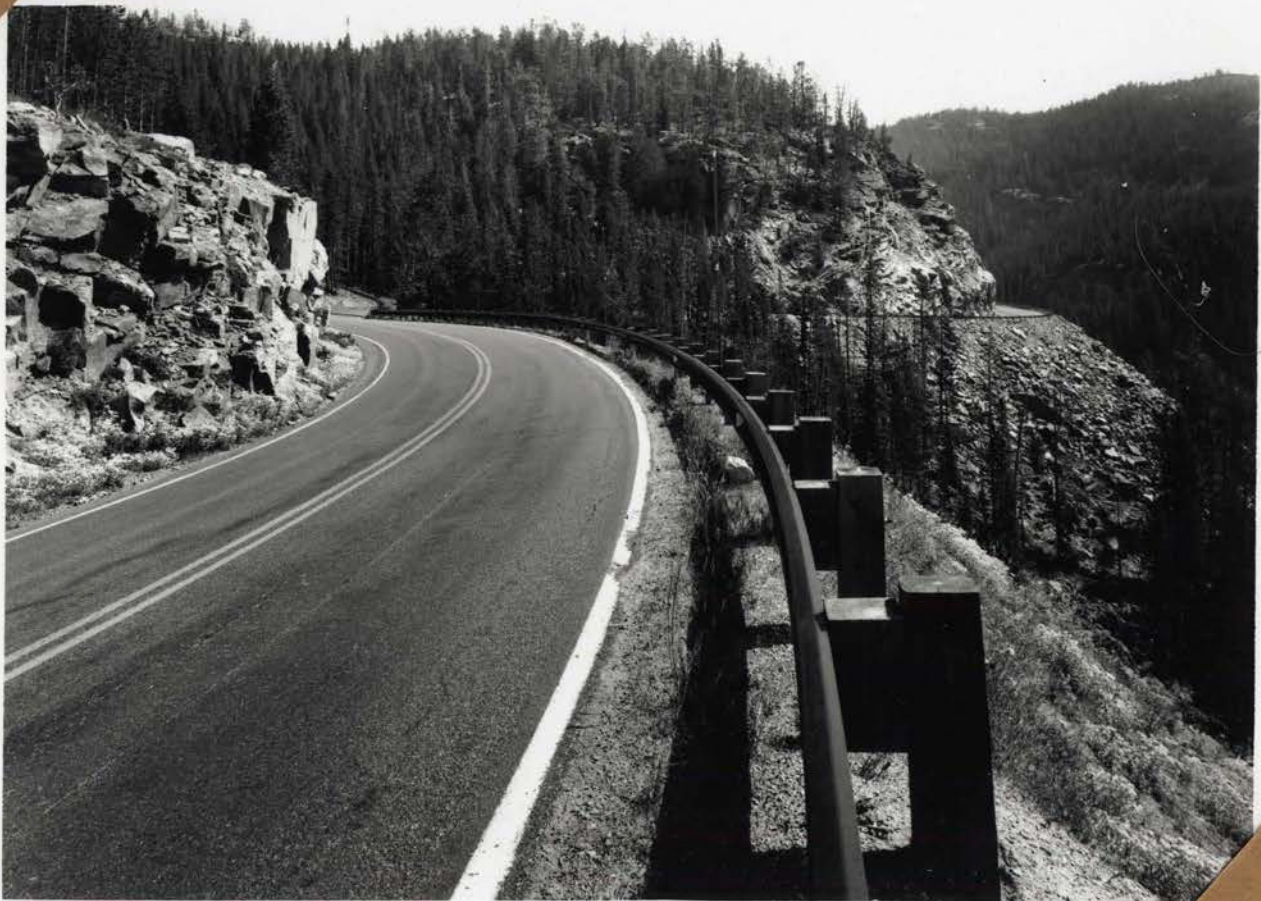
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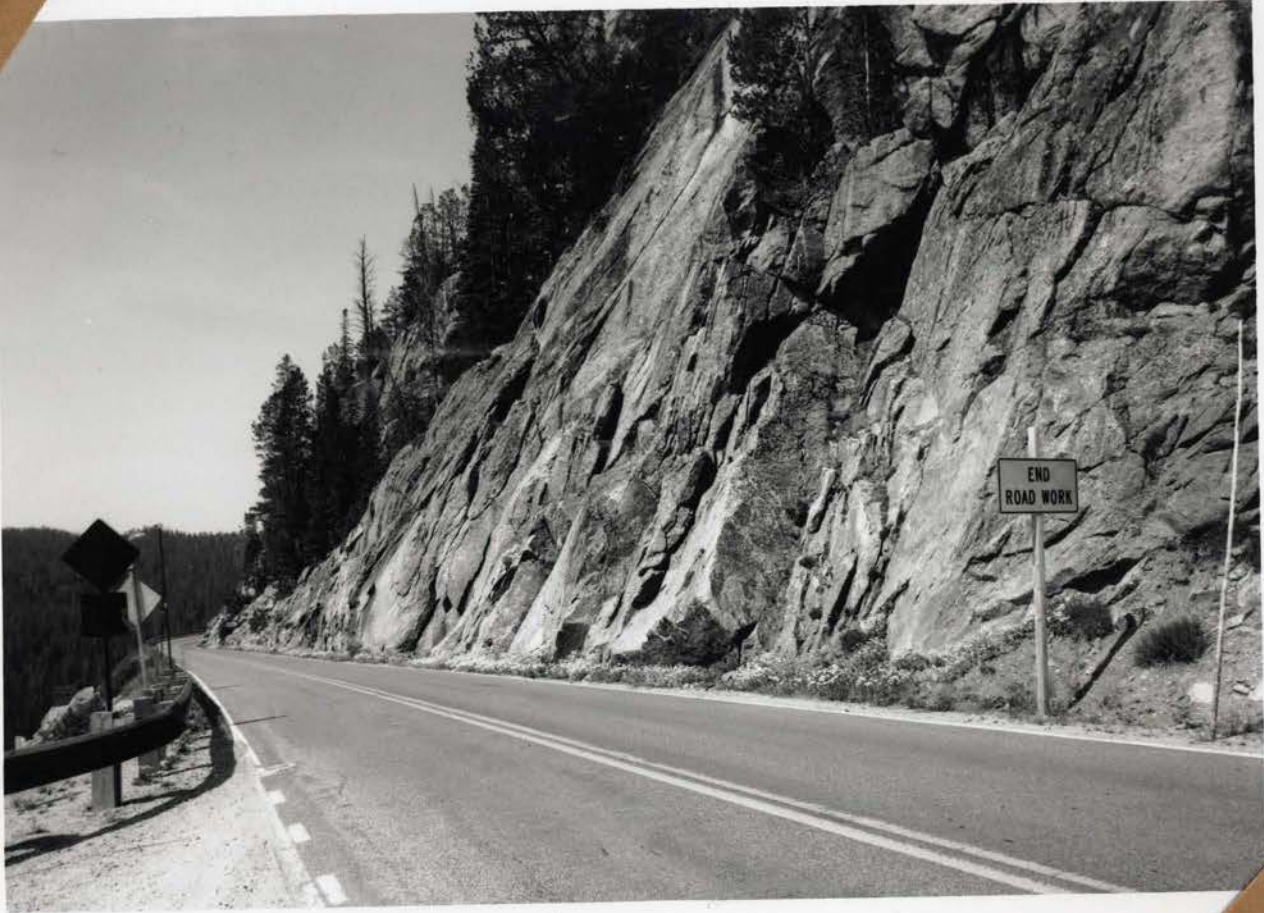
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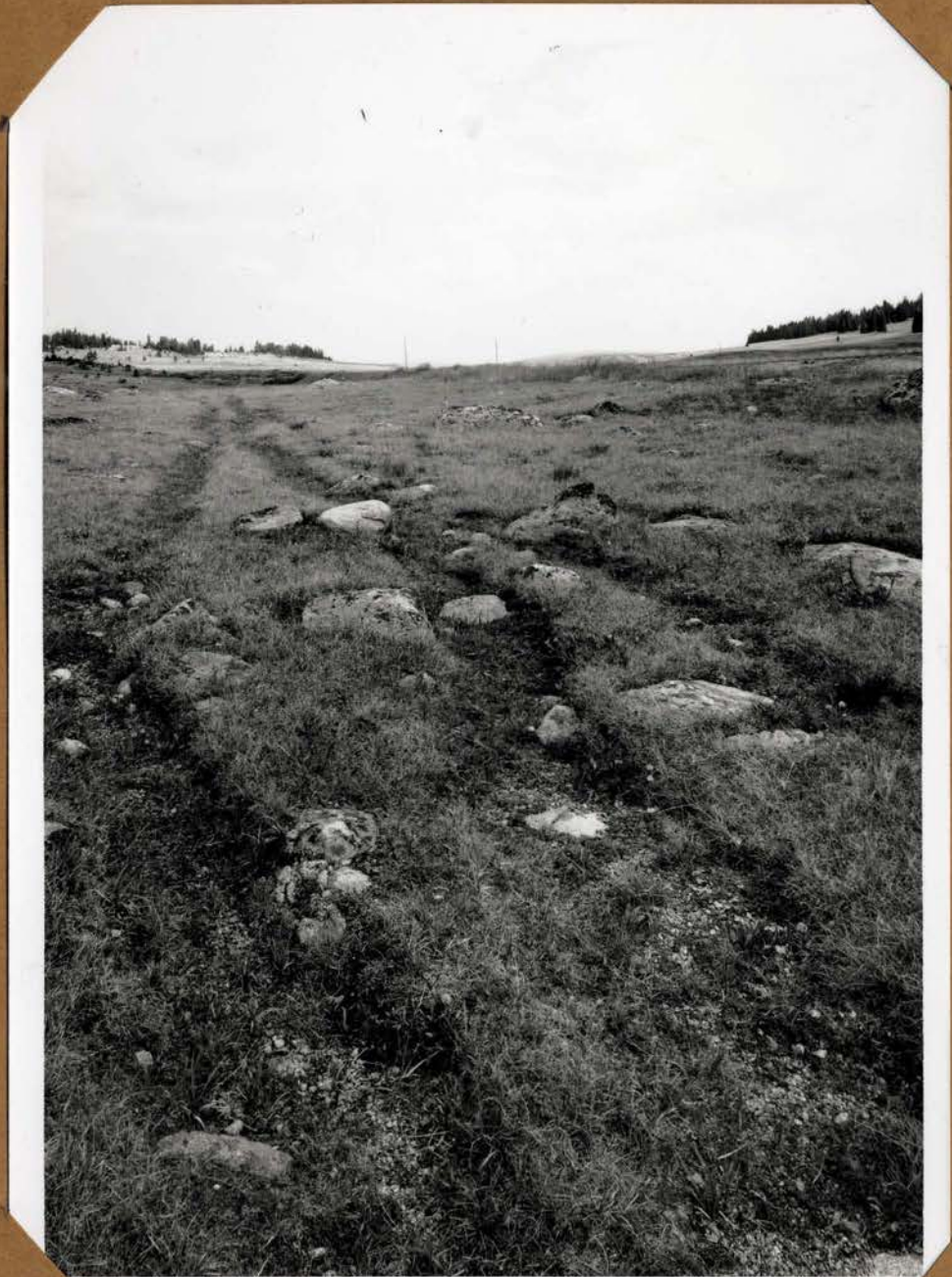
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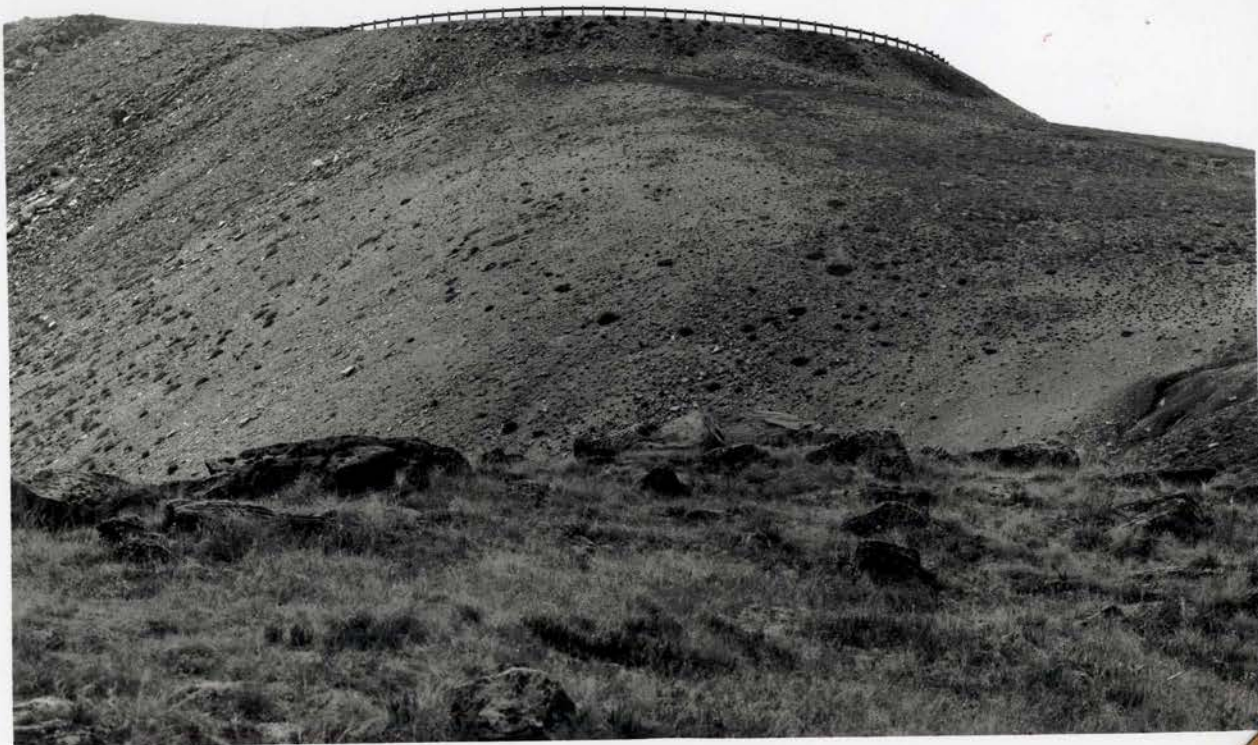
23.



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34.



35.



UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES
EVALUATION/RETURN SHEET

REQUESTED ACTION: NOMINATION

PROPERTY Red Lodge--Cooke City Approach Road Historic District
NAME:

MULTIPLE
NAME:

STATE & COUNTY: MONTANA, Carbon

DATE RECEIVED: 4/01/14 DATE OF PENDING LIST: 4/25/14
DATE OF 16TH DAY: 5/12/14 DATE OF 45TH DAY: 5/18/14
DATE OF WEEKLY LIST:

REFERENCE NUMBER: 14000219

REASONS FOR REVIEW:

APPEAL: N DATA PROBLEM: N LANDSCAPE: N LESS THAN 50 YEARS: N
OTHER: N PDIL: N PERIOD: N PROGRAM UNAPPROVED: N
REQUEST: N SAMPLE: N SLR DRAFT: N NATIONAL: N

COMMENT WAIVER: N

ACCEPT RETURN REJECT 5-8-14 DATE

ABSTRACT/SUMMARY COMMENTS:

Entered in
The National Register
of
Historic Places

RECOM./CRITERIA _____

REVIEWER _____ DISCIPLINE _____

TELEPHONE _____ DATE _____

DOCUMENTATION see attached comments Y/N see attached SLR Y/N

If a nomination is returned to the nominating authority, the nomination is no longer under consideration by the NPS.



United States Department of the Interior

NATIONAL PARK SERVICE
1849 C Street, N.W.
Washington, DC 20240

May 8, 2014

Memorandum

To: Acting Keeper of the National Register of Historic Places

From: Deputy Federal Preservation Officer, National Park Service *Robert L. Alta*

Subject: National Register Nomination for Red Lodge-Cooke City Approach Road
Historic District, Montana and Wyoming

I am forwarding the National Register nomination for the Red Lodge-Cooke City Approach Road Historic District in Montana and Wyoming, approaching the east gate of Yellowstone National Park. Although the road is not within or owned by Yellowstone National Park, a 2003-2004 Memorandum of Agreement among the Federal Highway Administration (FHWA), the Wyoming and Montana State Historic Preservation Offices, the US Forest Service, and the National Park Service specified that FHWA would complete a National Register nomination to allow Yellowstone National Park to nominate the property. The Park History Program has reviewed the form and found the property eligible at the national level under Criteria A, and C, with areas of significance of Engineering, Entertainment/Recreation, and Transportation.

Big Sky. Big Land. Big History.
Montana
Historical Society

Historic Preservation
Museum
Outreach & Interpretation
Publications
Research Center

February 27, 2014

Mike Tooley, Director
Montana Department of Transportation
2701 Prospect Ave.
PO Box 201001
Helena, MT 59620

Dear Director Tooley:

We are pleased to inform you that a property under your jurisdiction, *the Red Lodge-Cooke City Approach Road Historic District (Beartooth Highway)* is ready to be sent to the Keeper of the National Register for listing in the National Register of Historic Places. The National Register of Historic Places is the Federal government's official list of historic properties worthy of preservation. The nomination was presented to the Montana State Historic Preservation Review Board in January 2009. The review board supported the listing the property at that time.

Please find enclosed a notification form regarding the property. Also, enclosed is a brochure entitled *FAQs about the National Register* that addresses some of the most often asked questions about the Register program.

Please return the notification form to:

Dr. Mark Baumler
State Historic Preservation Officer
Montana Historical Society
1410 8th Avenue
P.O. Box 201202
Helena, MT 59620

If you have any questions, please contact me at 444-3647 or via e-mail at jboughton@mt.gov.

Sincerely,


John Boughton
National Register Program

enclosure: FAQs about the National Register
Owner concurrence or objection form

CC: Jon Axline

225 North Roberts Street
P.O. Box 201201
Helena, MT 59620-1201
(406) 444-2694
(406) 444-2696 FAX
montanahistoricalsociety.org

ARTS. PARKS. HISTORY.

Wyoming State Parks & Cultural Resources

State Historic Preservation Office
2301 Central Ave., Barrett Bldg. 3rd Floor
Cheyenne, WY 82002
307-777-7697
FAX: 307-777-6421
<http://wyoshpo.state.wy.us>

February 28, 2014

RDS Associates
ATTN: Hancock Associates
150 Field Drive, Suite 100
Lake Forest, IL 60045

Re: National Register of Historic Places nomination for the Red Lodge-Cooke City Approach Road Historic District.

I am pleased to inform you that the National Park Service intends to nominate the Red Lodge-Cooke City Approach Road Historic District to the National Register of Historic Places. The National Register is the nation's official list of historic properties worthy of preservation. Listing a property in the National Register provides recognition of the property's historic significance; however, it does not restrict the right of the owner to use, develop, maintain, or sell the property.

A National Register nomination for the Red Lodge-Cooke City Approach Road has been developed by the Wyoming State Historic Preservation Office and Yellowstone National Park and is available by request.

If you have any comments or questions regarding this matter, please do not hesitate to contact me at the address below or call me at 307-777-8594.

Sincerely,

Brian Beadles
Historic Preservation Specialist
Wyoming State Historic Preservation Office
2301 Central Avenue
Cheyenne, WY 82002



Matthew H. Mead, Governor
Milward Simpson, Director



United States Department of the Interior

National Park Service
P.O. Box 168
Yellowstone National Park
Wyoming 82190

IN REPLY REFER TO:

H32(YELL)

MAR 27 2014



Memorandum

To: Keeper of the Register

Through: Associate Director, Cultural Resources, Partnerships, and Science

From: Superintendent, Yellowstone National Park

Subject: National Register of Historic Places Nomination Form for the Red Lodge – Cooke City Approach Road Historic District, Montana and Wyoming

Yellowstone National Park is pleased to submit the attached National Register of Historic Places nomination for the Red Lodge – Cooke City Approach Road Historic District, also known as the Beartooth Highway. Although Yellowstone National Park (YNP) does not own the property, a 2003-2004 Memorandum of Agreement among the Federal Highway Administration (FHWA), the Wyoming and Montana State Historic Preservation Officers, the United States Forest Service, and the National Park Service specified that the Federal Highway Administration would complete research, documentation, and National Register nomination forms to the extent necessary to allow Yellowstone National Park to initiate procedures for nomination of the road corridor to the National Register. The initial documentation was compiled by Historical Research Associates, Inc. under the direction of Central Federal Lands Division of FHWA. Additional research, boundary adjustments, and an extensive review process were completed by YNP Cultural Resources staff with the assistance of the Wyoming State Historic Preservation Office.

As identified in the 2003-2004 Memorandum of Agreement, the National Register nomination of the Red Lodge — Cooke City Approach Road Historic District is a mitigation measure for an adverse effect on the road, which had been previously determined eligible for National Register.

The nomination review process included the Montana and Wyoming State Historic Preservation Offices, the Montana and Wyoming National Register Review Committees, appropriate certified local governments, the Montana and Wyoming Congressional representatives and staff, the Montana and Wyoming State Departments of Transportation, the Shoshone, Custer, and Gallatin National Forest supervisors, the Beartooth Steering Committee, the Cody Country Wyoming Chamber of Commerce, the City of Red Lodge, Montana, the Chamber of Commerce of Cooke City, Montana, the Friends of the Beartooth, the Friends of the Beartooth All American Road,

and other interested parties. The nomination has received wide support given the unique significance of the road.

This nomination represents the combined efforts of many contributors, historic preservation professionals, and land management agencies. The economic value of having a National Register nomination document to enhance local community interpretation of the dramatic road corridor is an added value to the adjacent communities, the general public, and the visitors who travel the historic road. If the nomination is approved, the park would appreciate a copy of the signature page to include in the nomination package for distribution to the many interested parties. A copy of the Montana State Historic Preservation Office letter to inform the right-of-way owner, Montana Department of Transportation, is attached as well as a copy of the Wyoming State Historic Preservation Office letter to RDS Corporation - the only private land owner affected by the listing in Wyoming - informing them of the National Register nomination. We appreciate the assistance of the Federal Preservation Officer, Robert Sutton, and his staff for their suggestions on improvements to the document.

If you have further question concerning the nomination or need additional information, please direct your request to Elaine Skinner Hale at (307) 344-2156 or Elaine_Hale@nps.gov.



Daniel N. Wenk

Attachments:

National Register Nomination of the Red Lodge—Cooke City Approach Road Historic District package

cc: (with enclosures)

Michael Will, Central Federal Lands
Clara Conner, Western Federal Lands
Del McOmie, Wyoming Department of Transportation
Mike Tooley, Montana Department of Transportation
Joe Alexander, Shoshone National Forest
Mary Erickson, Gallatin and Custer National Forest
Mark Baumler, Montana State Historic Preservation Officer
Mary Hopkins, Wyoming State Historic Officer
Scott Balyo, Cody Country Chamber of Commerce
Patty Davis, Red Lodge Chamber of Commerce
Ed Williams, City of Red Lodge, Montana
Kim Capron, Friends of the Beartooth
Claudia Wade, Park County, Wyoming Tourism
Robin Hoover, Yellowstone Country Tourism
Donna Rowland, Cooke City Chamber of Commerce
Bucky Hall, Park County Wyoming Commissioners

Marty Malone, Park County Montana Commissioners
Pam Buline, WY Senator John Barrasso
Karen McCreery, WY Senator Mike Enzi
Ryan McConnaughey, WY Representative Cynthia Lummis
MT Senator John Walsh
Jennifer Madgic, MT. Senator Jon Tester
Ethan Heverly, MT. Representative Steve Daines