

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: Gardiner Peak Lookout

Other names/site number: 10-IH-3237

Name of related multiple property listing:

L-4 Fire Lookouts in the USFS Northern Region (Region 1), 1932-1967

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



### 2. Location

Street & number: Gardiner Peak, West Fork District, Bitterroot National Forest

City or town: Darby, MT State: Idaho County: Idaho

Not For Publication:  Vicinity: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:

\_\_\_ national   X   statewide   X   local

Applicable National Register Criteria:

  X   A   \_\_\_   B   X   C   \_\_\_   D

<u><i>John Clark</i></u>	/ Regional Archaeologist	<u>2/16/18</u>
<b>Signature of certifying official/Title:</b>		<b>Date</b>
USDA Forest Service Northern Region (Region 1)		
<b>State or Federal agency/bureau or Tribal Government</b>		

In my opinion, the property <u>X</u> meets ___ does not meet the National Register criteria.		
<u><i>David Clark</i></u>		<u>1-31-18</u>
<b>Signature of commenting official:</b>		<b>Date</b>
State Historic Preservation Officer	Idaho State Historic Preservation Office	
<b>Title :</b>	<b>State or Federal agency/bureau or Tribal Government</b>	

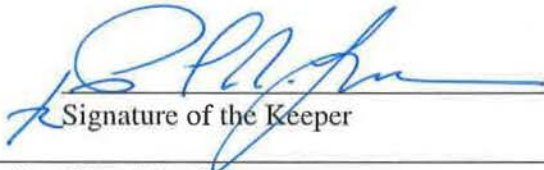
Gardiner Peak Lookout  
Name of Property

Idaho County, Idaho  
County and State

**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

4/6/2018  
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
- Structure
- Object

Gardiner Peak Lookout  
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**Number of Resources within Property**

(Do not include previously listed resources in the count)

Contributing	Noncontributing	
<u>2</u>	<u>1</u>	buildings
<u>          </u>	<u>1</u>	sites
<u>          </u>	<u>          </u>	structures
<u>          </u>	<u>          </u>	objects
<u>2</u>	<u>2</u>	Total

Number of contributing resources previously listed in the National Register N/A

**6. Function or Use**

**Historic Functions**

(Enter categories from instructions.)

Government

Other: fire lookout

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Current Functions**

(Enter categories from instructions.)

Government

Other: fire lookout

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Gardiner Peak Lookout  
Name of Property

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## 7. Description

### Architectural Classification

(Enter categories from instructions.)

Other: "Readicut" L-4 Lookout House (1936-pattern)

### Materials: (enter categories from instructions.)

Principal exterior materials of the property:

Foundation: CONCRETE

Walls: WOOD / Weatherboard; GLASS

Roof: WOOD / Shingle

Other:

### 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.)

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### Summary Paragraph

Gardiner Peak Lookout is a good example of the 1936-pattern L-4 Lookout House. It is located deep in the Selway Bitterroot Wilderness Area, within the boundary of the West Fork District of the Bitterroot National Forest. It is only accessible via pack trail, two of which converge at the site. Moose Creek Ranger Station, located roughly thirteen miles northwest, is the closest forest service administrative site.

The lookout and its associated improvements are located atop Gardiner Peak, at an elevation of roughly 6,597 ft. The west and south facing slopes below the peak are sparsely vegetated with low-growing vegetation. In contrast, the northern flank of the peak contains moderately dense, mixed stands of pine and fir, dominated by lodgepole pine. The lookout commands a view of much of the Selway River and its tributary streams including areas within the Bitterroot and the adjacent Nez Perce-Clearwater national forests.

Gardiner Peak Lookout  
Name of Property

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## Narrative Description

Historical improvements at the site include the lookout house and tower and an outhouse. Other site features include: a modern telecommunications shed, a rectangular cleared area outlined with rock that may represent a helipad, and two piles of wood. A flagpole present in 2004 has been removed from the site.

### *Gardiner Peak Lookout (contributing building)*

The lookout is a 1936-pattern L-4 lookout. The 14 ft. by 14 ft. wood frame house or cab has a pyramidal roof and sits atop a 10 foot-high, timber tower. The four legs of the cross-braced tower are anchored to cast-in-place concrete footings. A single-flight stairway leads from the north corner of the tower base to a trap door that provides access to the catwalk. The stairs have timber stringers and board treads. The catwalk safety railing consists of two horizontal rails with diagonal bracing at each corner.

Simple drop wood siding covers the lower portion of the cab's exterior walls, and the roof is covered with sawn cedar shingles with metal ridge finishes. A new stainless steel stove pipe extends above the southeast slope of the roof. The entry into the lookout cab is located at the east edge of the southwest wall. The entry contains what appears to be its original wood door with three lights over one panel, as well as a wood-frame screen door. Four three-light windows are located in the wall west of the entry. The remaining three walls each contain five, three-light, wood windows. The central sash in each wall opens casement style for ventilation, while the remaining windows are fixed. The building retains its lightning protection. Radio antennae are affixed to the catwalk railing at its north and west corners, and four solar panels are attached to the railing on the northwest side of the railing.

In the one-room interior, the original maple floor is intact and in fair condition. The space is fitted with a stand for the Osborne fire-finder, a small wood-burning stove, a platform bed with drawers beneath for storage, and several tables, storage benches, and a wood box.

### *Outhouse (contributing building)*

The outhouse is located about 150 feet east of the lookout. This one-story front-gable building measures 3.5 ft. by 4 ft. The exterior walls are covered with shiplap wood siding with vertical corner board trim. The roof is covered with wood shingles. The front (southeast) wall has a vertical board and batten door.

### *Telecommunications shed (noncontributing building)*

A small wood-frame telecommunications shed has been built between the tower legs below the lookout cab. The structure's exterior walls are covered with horizontal lapped siding with vertical corner board trim, with shingles in the ends of the shallow gable roof. The structure contains communications equipment for the lookout.

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*Rock-lined cleared area (noncontributing site)*

A cleared area, measuring roughly 23 ft. by 17 ft. is located about 25 ft. northeast of the lookout. This may represent a designated landing site for helicopters, although the site's location inside a designated wilderness area would seem to preclude the use of aircraft.

**Integrity**

Gardiner Peak Lookout retains all seven aspects of historical integrity. The lookout is in its original location, in a remote area only accessible by trail. Its remoteness in turn contributes to its exceptional integrity of setting, feeling, and association. In addition, the lookout house and tower retain integrity of materials, workmanship and design. Although the three-light window sashes do not conform to the specifications for the 1936-pattern L-4 lookout house, they appear to be original to the building.<sup>1</sup> The lookout stands as a good example of the once-common 1936-pattern L-4 lookouts included in the Bitterroot National Forest's fire detection system.

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<sup>1</sup> Saint Mary's Peak Lookout, located on the Stevensville District of the Bitterroot National Forest also dates to 1953 and has the same three-light windows.

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## 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
- 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.)

Politics / Government  
Conservation  
Engineering  
Architecture

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**Period of Significance**

1953- 1967

**Significant Dates**

1953 (year built)

**Significant Person**

(Complete only if Criterion B is marked above.)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Cultural Affiliation**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Architect/Builder**

Clyde Fickes (designer)

**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.)

Gardiner Peak Lookout is eligible for listing in the National Register of Historic Places under criteria A and C, at the local and state level of significance. Under Criterion A, it is significantly associated with the US Forest Service's early fire detection program, which relied on a series of fixed lookout points from which to locate forest fires. Under Criterion C, the lookout is representative of the 1936-pattern L-4 Lookout House.

Gardiner Peak Lookout meets the Registration Requirements set forth in the *L-4 Fire Lookouts in the USFS Northern Region (Region 1), 1932-1967 Multiple Property Document* under the contexts *The Role of the L-4 Lookout House in the Development of the US Forest Service Region 1's Fire Detection System* and *Fire Lookout Development on the Bitterroot National Forest*, and the *L-4 Lookout* property type. The period of significance identified for L-4 lookouts in the Bitterroot National Forest begins in 1937 and ends in 1967, within the defined period of significance in the MPD cover form. Although Gardiner Peak has been used as a fire detection point since the early 1920s the current L-4 lookout structure dates to 1953.

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

Gardiner Peak has served as a lookout point since the early 1920s. During an examination of the East Selway River portion of the Bitterroot National Forest, Elers Koch mentioned "Gardner"



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Peak as one of four designated lookout points. At the time, Koch described the lookout point as “not ... satisfactory, and was used only a short time ...” during the fire season. Improvements in 1920 would have consisted of a tent camp with some type of fire detection apparatus.

Although Koch was unimpressed with the location, five years later, the forest built a two-story log lookout on Gardiner Peak (Figure 1). An article in the June 12, 1925 edition of *The Spokesman Review*, indicated that three, 12 ft. by 12 ft. lookout buildings with a cupola for observation purposes were to be built on “Gardiner’s” Peak, Squaw Peak, and Corral Hill.



Figure 1. Photo of the 1925 log lookout with cupola. According to Kresek, Charles Hemphill served as the smoke-chaser.<sup>2</sup> Carl Asker may have been the lookout man, whose job it was to remain at the lookout and spot fires.

While the Bitterroot invested in the construction of improvements at Gardiner Peak, its function within the forest’s system of fixed detection points is ambiguous: In 1936, Gardiner Peak was classified as a lookout occupied during a ‘minimum’ season.<sup>3</sup> This reference to minimum season suggests a position somewhere between a primary lookout (i.e., one occupied throughout the regular fire season) and a secondary lookout (i.e., one occupied only during emergency fire events). An undated chart believed to be from the late 1930s or early 1940s, lists Gardiner Peak among the roughly sixty facilities with “fire goers” (smoke chasers) and “detectors” (lookout

<sup>2</sup> Ray Kresek, *Fire Lookouts of the Northwest*, p. 284 (Fairfield WA: Ye Galleon Press 1984).

<sup>3</sup>1936 Bitterroot National Forest Map. Folder: F – Plans Bitterroot Suppression, Box 21, Series: BIT05 Forest Supervisors Alpha Files ca 1900-1963 (hereinafter BIT05), RG 95 Records of the Forest Service Bitterroot National Forest, National Archives and Records Administration, Seattle (hereinafter NARA Seattle).

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men) forest wide. It was one of eleven manned points included in the Cooper's Flat area of the Moose Creek District, deep in the Selway River country.<sup>4</sup>

The fact that the forest chose Gardiner Peak as a candidate for a new lookout building during the 1950s lookout replacement program indicates that it remained a high priority lookout point. The construction of the current L-4 lookout in 1953 indicates that this point was an integral component of the forest's air-ground detection system, which was fully implemented by the early 1950s.<sup>5</sup>

Gardiner Peak Lookout continued to be manned each season through at least 1967, when it was one of seventeen fixed detection points in use on lands within the Bitterroot National Forest's administrative boundary. By this time, however, the Nez Perce National Forest had assumed responsibility for managing the lookout.<sup>6</sup> By the 1970s, Gardiner Peak appears to have been downgraded to an emergency lookout point, and occupied only during periods of high fire danger. It continues in this capacity today.

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<sup>4</sup> "Fire Goers & Detectors chart for all ranger districts on the Bitterroot NF" no date. Folder F: Plans Permanent Presuppression, Box 20, RG 95 Records of the Forest Service Bitterroot National Forest, Forest Supervisor's Files Alpha Files E -Improvements, NARA Seattle.

<sup>5</sup> Ralph Hand "History of Region 1 Lookout System," August 23, 1954. Folder Historical: Lookouts, Box 46, RG 95 Historical Collection, NARA Seattle.

<sup>6</sup> "List of Lookouts in R 1 1967." Folder 5100 Lookouts Historical 2 of 2, Box 45, 95 Records of the Forest Service Region 1, Missoula, Montana Historical Collection 1903-1990 (hereinafter RG 95 Historical Collection), NARA Seattle.

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Name of Property

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## 9. Major Bibliographical References

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

Kresek, Ray

1984 *Fire Lookouts of the Northwest*. Fairfield Washington: Ye Galleon Press.

RG 95 Records of the US Forest Service, National Archives and Records Administration, Seattle, Washington.

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### 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: National Archives & Records Administration, Seattle, WA

**Historic Resources Survey Number (if assigned):** 10-IH-3237

Gardiner Peak Lookout  
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## 10. Geographical Data

**Acreeage of Property** roughly one acre

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: 45.969950                      Longitude: -114.766606

### UTM References

Datum (indicated on USGS map):

NAD 1927    or     NAD 1983

1. Zone: 11                      Easting: 673029    Northing: 5093134

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

The boundary of this property is an arbitrary line drawn to encompass the area on top of Gardiner Peak that contains the lookout and associated resources.

### Boundary Justification (Explain why the boundaries were selected.)

The boundary encloses the primary improvement at this location, namely the lookout house and tower and its associated outhouse.

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## 11. Form Prepared By

name/title: Janene Caywood

organization: CRCS

street & number: 1002 South 6<sup>th</sup> St. West

city or town: Missoula    state: MT    zip code: 59801

[e-mail: crcs@montana.com](mailto:crcs@montana.com)

telephone: 406 728-9190

date: November 2, 2017

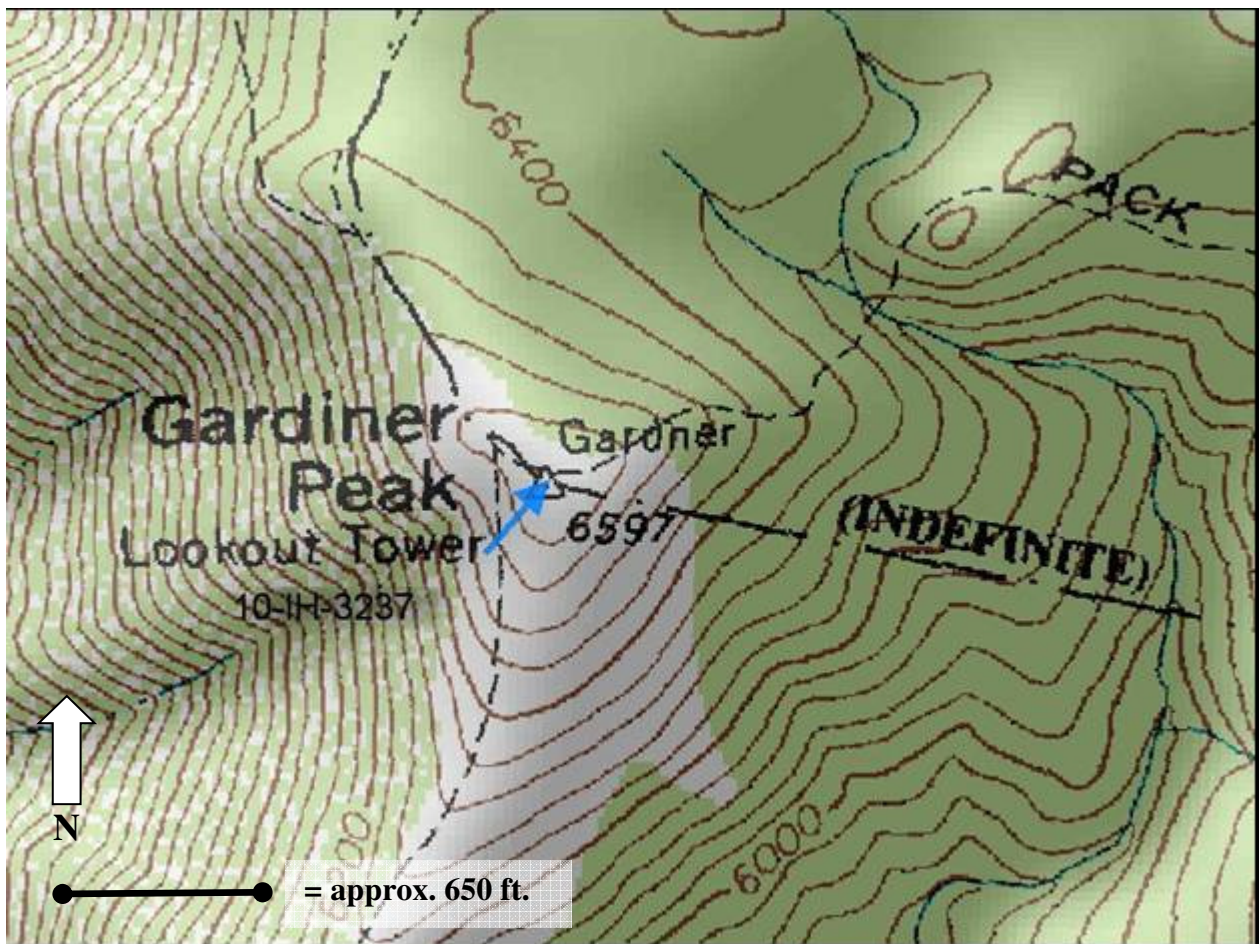
Gardiner Peak Lookout  
Name of Property

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County and State

**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.)



Portion of the USGS Gardiner Peak Quadrangle, 1966, showing the location of the lookout.

Gardiner Peak Lookout  
Name of Property

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Gardiner Peak Lookout  
Name of Property

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**Photographs**

Submit clear and descriptive photographs. The size of each image must be 1600 x 1200 pixels (minimum), 3000 x 2000 preferred, at 300 ppi (pixels per inch) or larger. 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**

**All Photographs**

Name of Property: Gardiner Peak Lookout

City or Vicinity: Darby, Montana vicinity

County: Idaho State: Idaho

Photographer: Janene Caywood

Date Photographed: July 10, 2017

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

**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.

Gardiner Peak Lookout  
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ID\_IdahoCounty\_GardinerPeakLookout\_0001. Looking west-southwest to the southeast (front) and northeast walls of the lookout.



Gardiner Peak Lookout  
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ID\_IdahoCounty\_GardinerPeakLookout\_0002. Looking east-northeast to the northwest and southwest walls of the lookout.

Gardiner Peak Lookout  
Name of Property

Idaho County, Idaho  
County and State



ID\_IdahoCounty\_GardinerPeakLookout\_0003. Looking northwest to the southeast (front) wall of the lookout.

Gardiner Peak Lookout  
Name of Property

Idaho County, Idaho  
County and State



ID\_IdahoCounty\_GardinerPeakLookout\_0004. Detail of the cast-in-place concrete footing.

Gardiner Peak Lookout  
Name of Property

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ID\_IdahoCounty\_GardinerPeakLookout\_0005. Looking northwest: detail of the door.

Gardiner Peak Lookout  
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ID\_IdahoCounty\_GardinerPeakLookout\_0006. Looking south along the catwalk.

Gardiner Peak Lookout  
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ID\_IdahoCounty\_GardinerPeakLookout\_0007. Interior: stand with Osborne fire-finder.

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ID\_IdahoCounty\_GardinerPeakLookout\_0008. Lookout interior: wood stove.

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ID\_IdahoCounty\_GardinerPeakLookout\_0009. Looking north-northwest to the southwest and southeast (front) walls of the outhouse.



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County and State \_\_\_\_\_



ID\_IdahoCounty\_GardinerPeakLookout\_0010. Looking south-southeast to the northwest (rear) and northeast side of the outhouse.

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ID\_IdahoCounty\_GardinerPeakLookout\_0011. Detail, rock pile possibly representing the former location of the flagpole.

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ID\_IdahoCounty\_GardinerPeakLookout\_0012. Overview looking east over the rock-lined cleared area.



























UNITED STATES DEPARTMENT OF THE INTERIOR  
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES  
EVALUATION/RETURN SHEET

Requested Action: Nomination

Property Name: Gardiner Peak Lookout

Multiple Name:

State & County: IDAHO, Idaho

Date Received: 2/22/2018      Date of Pending List: 3/14/2018      Date of 16th Day: 3/29/2018      Date of 45th Day: 4/9/2018      Date of Weekly List:

Reference number: MP100002295

Nominator: State

Reason For Review:

Accept       Return       Reject      4/6/2018 Date

Abstract/Summary Comments: The Gardiner Peak Lookout is of state level significance under National Register Criteria A and C in the areas of Conservation, Politics/Government, Architecture and Engineering. The modest, wood and glass enclosed building represents an excellent example of a 1936-pattern, L-4 type Forest Service lookout, in this case set atop a 10' timber tower. The 1953 lookout is associated with the Forest Service's significant early twentieth century regional fire detection and conservation programs. The property meets the Registration Requirements of the associated MPS.

Recommendation/ Criteria      Accept Criteria A and C

Reviewer Paul Lusignan

Discipline Historian

Telephone (202)354-2229

Date 4/6/2018

DOCUMENTATION:      see attached comments : No      see attached SLR : No

If a nomination is returned to the nomination authority, the nomination is no longer under consideration by the National Park Service.





United States  
Department of  
Agriculture

Forest  
Service

Region One

Northern Region  
26 Fort Missoula Road  
Missoula, MT 59804

File Code: 2360

Date: February 16, 2018

J. Paul Loether, Keeper, National Register and National Historic Landmark Programs  
National Park Service  
National Register of Historic Places  
1849 C St., NW - Mail Stop 7228  
Washington, DC 20240



Dear Mr. Loether,

Enclosed please find the following property nominations for your consideration for listing in the National Register of Historic Places:

<b>Gird Point Lookout</b>	in Ravalli County, Montana
<b>Medicine Point Lookout</b>	in Ravalli County, Montana
<b>St. Mary Peak Lookout</b>	in Ravalli County, Montana
<b>Gardiner Peak Lookout</b>	in Idaho County, Idaho
<b>Salmon Mountain Lookout</b>	in Idaho County, Idaho

The enclosed disks contain the true and correct copies of the National Register nominations for the Gird Point Lookout, Medicine Point Lookout, St. Mary Peak Lookout, Gardiner Peak Lookout, and Salmon Mountain Lookout for listing in the National Register of Historic Places.

All of the properties are being listed under the previously submitted and accepted L-4 *Fire Lookouts in the USFS Northern Region (Region 1), 1932-1967* Multiple Property Submission.

Please be advised that the Montana and Idaho State Historic Preservation Offices notified owners in excess of 45 days prior to the Preservation Review Board's meetings and public officials in excess of 30 days prior to the Preservation Review Board's meetings. The Review Boards unanimously recommended that these properties be nominated and I concur with their recommendation.

Thank you for your consideration.

Sincerely,

Jorie Clark  
Regional Archaeologist, Delegated Federal Preservation Officer  
U.S. Forest Service, Northern Region

Enclosure





## WILDERNESS WATCH

*Keeping Wilderness Wild*

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Minneapolis, MN Office  
2833 43rd Avenue South  
Minneapolis, MN 55406  
(P) 612.201.9266

Moscow, ID Office  
P.O. Box 9623  
Moscow, ID 83843  
(P) 208.310.7003

To: National Register of Historic Places  
National Park Service  
1849 C St. NW, MS 7228  
Washington, D.C. 20240

From: Wilderness Watch  
Friends of the Clearwater

Date: March 28, 2018

Re: Comments in response to Federal Register  
Notice 83 F.R. 11244  
Gardiner Peak Lookout  
St. Mary Peak Lookout  
Salmon Mountain Lookout

Sent via US Mail and email to [nr\\_info@nps.gov](mailto:nr_info@nps.gov) and  
[Alexis\\_Abernathy@nps.gov](mailto:Alexis_Abernathy@nps.gov)

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National Register Official,

Wilderness Watch and Friends of the Clearwater do not oppose historic listing of the Gardiner Peak, St. Mary Peak, and Salmon Mountain Lookouts so long as the National Park Service and relevant administering agencies acknowledge and adhere to limitations imposed by the Wilderness Act, 16 U.S.C. § 1131 et seq., on the maintenance and perpetuation of those structures in wilderness. It appears that the Gardiner Peak<sup>1</sup> and St. Mary Peak Lookouts are in the Selway Bitterroot Wilderness, and the Salmon Mountain Lookout is in the Frank Church-River of No Return Wilderness.<sup>2</sup> The Wilderness Act prohibits structures in wilderness subject to narrow exception where the structure is “necessary to meet minimum requirements for the administration of the area for the purpose of [the Act].” 16 U.S.C. § 1133(c). While administering agencies are not required to remove existing non-conforming structures from wilderness, they cannot take action to perpetuate their existence unless the narrow administrative necessity

<sup>1</sup> The attached Facebook blog of the Nez Perce and Clearwater National Forests notes the Forest Service is going ahead with heavy maintenance work on this structure and considers it historical.

<sup>2</sup> See <http://nhlr.org/lookouts/us/id/gardiner-peak-lookout/>, <http://nhlr.org/lookouts/us/mt/st-mary-peak-lookout/>, and <http://nhlr.org/lookouts/us/id/salmon-mountain-lookout/> (last visited 3/26/18).

exception is met. Historic listing is not a sufficient basis for perpetuating a structure otherwise prohibited under the Wilderness Act.

Wilderness Watch and Friends of the Clearwater support historic preservation efforts that are compatible with wilderness preservation. Historic preservation laws are a “planning tool,” and an agency may “adopt any course of action [for preservation of a listed structure] it believes is appropriate” so long as it follows proper procedures. 36 C.F.R. § 60.2(a); *see also* 54 U.S.C. § 306103. Regulations contemplate various preservation actions that are generally compatible with wilderness preservation, including written and photographic curation as well as relocation of a structure outside of wilderness if more intensive maintenance and rehabilitation actions are desired. *See* 36 CFR §§ 60.2(a), 60.14(b); 54 U.S.C. §§ 300315, 306103, 306108. Accordingly, we have no objection to listing so long as the agencies do not undertake repair and rehabilitation work to prolong the existence of unnecessary structures within wilderness and so long as the agencies do not authorize motorized uses to facilitate management of these structures.

Regards,



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George Nickas, Executive Director  
Wilderness Watch



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Gary Macfarlane, Ecosystem Defense Director  
Friends of the Clearwater  
PO Box 9241  
Moscow, ID 83843