

United States Department of the Interior
National Park Service

MP 2299

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: St. Mary Peak Lookout

Other names/site number: 24RA0174; St. Mary's Peak Lookout; Saint Mary Peak Lookout

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: St. Mary Peak, Stevensville Ranger District, Bitterroot National Forest

City or town: Stevensville

State: Montana

County: Ravalli

Not For Publication: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>Joie Clark / Regional Archaeologist</u>	<u>2/16/18</u>
Signature of certifying official/Title:	Date
<u>USDA Forest Service, Northern Region</u>	
State or Federal agency/bureau or Tribal Government	

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

<u>Mark F. Summer, SHPO</u>	<u>2/17/2018</u>
Signature of commenting official:	Date
Title: <u>MONTANA STATE HISTORIC PRESERVATION OFFICE</u>	State or Federal agency/bureau or Tribal Government

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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

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Number of Resources within Property

(Do not include previously listed resources in the count)

Contributing	Noncontributing	
<u>1</u>	<u> </u>	buildings
<u>1</u>	<u> </u>	sites
<u> </u>	<u>2</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

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7. Description

Architectural Classification

(Enter categories from instructions.)

Other: “Readicut” L-4 Lookout House

Materials: (enter categories from instructions.)

Principal exterior materials of the property:

Foundation: STONE / Granite

Walls: WOOD / Weatherboard; GLASS

Roof: WOOD / Shingle

Other: WOOD / Log (tower)

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

St. Mary Lookout is located on top of St. Mary Peak, at an elevation of 9351 feet above sea level. It lies roughly five miles east of the Idaho-Montana state line, and inside the Selway-Bitterroot Wilderness Area. It commands sweeping views of the rugged Bitterroot Mountains to the west and the Bitterroot Valley to the east. The relatively level rocky ridge top is vegetated with grasses and forbs, interspersed with stands of low-growing white bark pine.

Narrative Description

Improvements associated with St. Mary Peak lookout include the 1936-pattern L-4 lookout cab on a stone foundation, a rudimentary pit toilet, and a hitching rail. Also present are the footings for the first L-4 lookout built in 1934.

St. Mary 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 an 8-foot-high mortared stone tower or base. An opening in its north wall provides access to the interior of the tower. Guy wires extend from each of the lookout's four corners securing the building to the ground. The catwalk is accessed by a single-flight stairway located at the north end of the west side. The stair stringers and treads are made with dimensional lumber and the base rests on a concrete footing. The catwalk safety railing consists of two horizontal rails with diagonal bracing at each corner. Dimensional lumber brackets, braced against the stone base, support the catwalk.

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 west

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slope of the roof at its south end. The entry into the lookout cab is located at the north end of the east-facing wall. The entry contains a wood door with six lights above one panel. Four three-light windows are located in the wall south 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. A radio antenna is attached to the northeast corner of the catwalk 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.

Pit toilet (noncontributing structure)

A pit toilet is located about 80 feet west of the lookout. This simple open sided structure consists of a wood frame platform and a seat, accessed from a single wood step. It is set over a hole excavated in the talus.

Concrete footings (contributing site)

Four concrete footings, marking the site of the original L-4 lookout erected at this location in 1934, are located 20 feet west of the current lookout.

Hitching rail (noncontributing structure)

A modern hitching rail is located adjacent to the northeast concrete footing. This small structure is made with two vertical peeled log posts with a horizontal rail affixed to the posts with a metal strap.

Integrity

St. Mary 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. The lookout building 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.¹ St. Mary Peak Lookout stands as an exceptional example of the 1936-pattern L-4 lookouts included in the Bitterroot National Forest's fire detection system.

¹ Gardiner Peak Lookout, located in Idaho on the West Fork 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.)

St. Mary 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, St. Mary Peak Lookout is an excellent example of a 1936-pattern L-4 Lookout House.

St. Mary 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 associated 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 this lookout begins in 1953 and ends in 1967, within the defined period of significance of 1932-1967 identified in the MPD cover form. The current lookout building has been part of the forest's fixed point fire detection system since 1953, when it replaced an earlier lookout structure.

The period of significance identified for this property extends from its construction in 1953 through 1967, the end of the historical period as defined in the MPD cover form.

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

The Bitterroot National Forest identified St. Mary Peak as a lookout site sometime prior to 1933, when it appeared on a base map for the forest, along with six other lookout sites within the Stevensville District.² In 1934, the forest improved the site with a lookout house atop a 40-ft. pole tower. A violent windstorm in 1951 blew the lookout cab 100 ft. down the mountain. The current, 1936-pattern L-4 cab on a stone base was completed in 1953 for a cost of \$4,970.³

In August of 1956, Assistant Forest Supervisor, Howard C. Lee conducted an inspection of the lookout atop Saint Mary Peak. He detected several issues, including the fact that the lightning protection on the cab did not meet current standards.⁴ Apparently, the wiring had been made with salvaged wire, with the result that connections that should have been made with one long piece of wire, had instead been made with many short sections spliced together. The forest had no money to cover the cost of the new wire, and asked for help from the region. The forest promised that if the region could provide the materials, the forest would conduct the work with contributed time of the communication technician, alternates and headquarters guards.⁵

Lee also recommended modifications to the stairway leading to the lookout and its catwalk:

After thinking about the stairway at the St. Mary's Lookout, I believe we should install the standard safety gate at the head of the stairway. I also believe we can dispense with the heavy trap door in the catwalk by removing the hinges, cutting the door in two and fitting it to the opening one section at a time. We can provide for locking the catwalk at the seasons end by use of heavy hook-eye and chain arrangement.⁶

It appears that Lee's recommendations regarding the catwalk trap door were implemented, while the safety gate was never installed.

Also in 1956, just three years after completion of the new lookout, inspectors from the regional office began to question the utility of St. Mary Peak Lookout for detecting fires in the Bitterroot Valley:

... it appears that at least two of the present lookout points on this district (Stevensville) are not providing desirable detection coverage. These two points are St. Maries (sic) Peak and Palisade Mountain. The areas seen by these points is limited and with such a wide valley between them

² A memorandum written in 1982 indicates that the first known fire detection report originating from St. Mary's Point dates to 1931. Bitterroot NF to Regional Forester, September 24, 1982. Folder 1 Lookouts 1914 -, Box 7, Bitterroot National Forest Heritage Archives, Supervisor's Office, Hamilton, Montana.

³ Form titled "Primary Lookout Towers and Houses Constructed 1940 to 1956," 2/13/1957. Folder: F-Improvements-General, Box 20, Records of the Bitterroot National Forest BIT05, National Archives and Records Administration, Seattle (hereinafter NARA Seattle).

⁴ Howard C. Lee, Assistant Forest Supervisor, Memorandum to Files August 15, 1956. Folder: F Inspection-General, 1954, 1955, 1956, 1957, Box 20, RG 95 Records of the Bitterroot National Forest BIT05, NARA Seattle.

⁵ Memo from Thurman H. Trosper to Regional Forester, Jan. 4, 1957. Folder: F-Improvements - Genera, Box 20, RG 95 Records of the Forest Service Bitterroot National Forest, Forest Supervisor's Files Alpha Files E -Improvements, NARA Seattle.

⁶ Howard C. Lee, Assistant Forest Supervisor, Memorandum to Files August 15, 1956. Folder: F Inspection-General, 1954, 1955, 1956, 1957, Box 20, RG 95 Records of the Bitterroot National Forest BIT05, NARA Seattle.

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they cannot be depended upon to cover the opposite valley-facing slopes where the highest risks and values occur.⁷

The forest continued to use St. Mary Peak Lookout as a fixed-point fire detection site through 1971. The following year the forest abandoned the site because it did not meet “minimum detection requirements,” as established in a 1970 fire planning study. Specific issues included the fact that the seen area from the lookout was often obscured by fog and low clouds. Also, much of the seen area west of the lookout incorporated rocky alpine terrain. While the forest could have burned the lookout, it chose to keep it in place. As sated in a 1982 memo to the regional forester:

The site is popular with visitors and is historically significant in the local area. For these reasons, the Bitterroot Forest has opted to save the structure from burning. Since 1975, we have stationed unpaid volunteers at St. Mary’s to provide visitor information services, communications, and limited fire detection.⁸

In 1998, volunteers working under the Passport in Time program restored the exterior of the lookout. The cedar shingle roof was replaced in kind in 2008. Subsequent preservation maintenance has included rebuilding/re-glazing windows and replacing boards in the catwalk floor. The forest continues to use volunteers to man the lookout during the summer.

⁷ David R. Kyle, “Memorandum of Inspection,” September 11, 1956. Folder: F Inspection-General, 1954, 1955, 1956, 1957, Box 20, RG 95 Records of the Bitterroot National Forest BIT05, NARA Seattle.

⁸ A memorandum written in 1982 indicates that the first known fire detection report dates to 1931. Bitterroot NF to Regional Forester, September 24, 1982. Folder 1 Lookouts 1914 -, Box 7, Bitterroot National Forest Heritage Archives, Supervisor’s Office, Hamilton, Montana.

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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.

Bitterroot National Forest Heritage Archives, Office of the Forest Supervisor, Hamilton, MT.

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

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): 24RA0174

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10. Geographical Data

Acreage of Property Less than 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: 46.511750 Longitude: -114.243930

UTM References

Datum (indicated on USGS map):

NAD 1927 or NAD 1983

1. Zone: 11 Easting: 711430 m Northing: 5154599 m

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

The boundary of this property is an arbitrary line drawn to encompass the top of the rocky knob containing the lookout and associated resources.

Boundary Justification (Explain why the boundaries were selected.)

The boundary encloses the primary improvements at this location.

11. Form Prepared By

name/title: Janene Caywood
organization: CRCS
street & number: 1002 South 6th St. West
city or town: Missoula state: Montana zip code: 59801
e-mail: crcs@montana.com
telephone: 406 728-9190
date: January 31, 2018

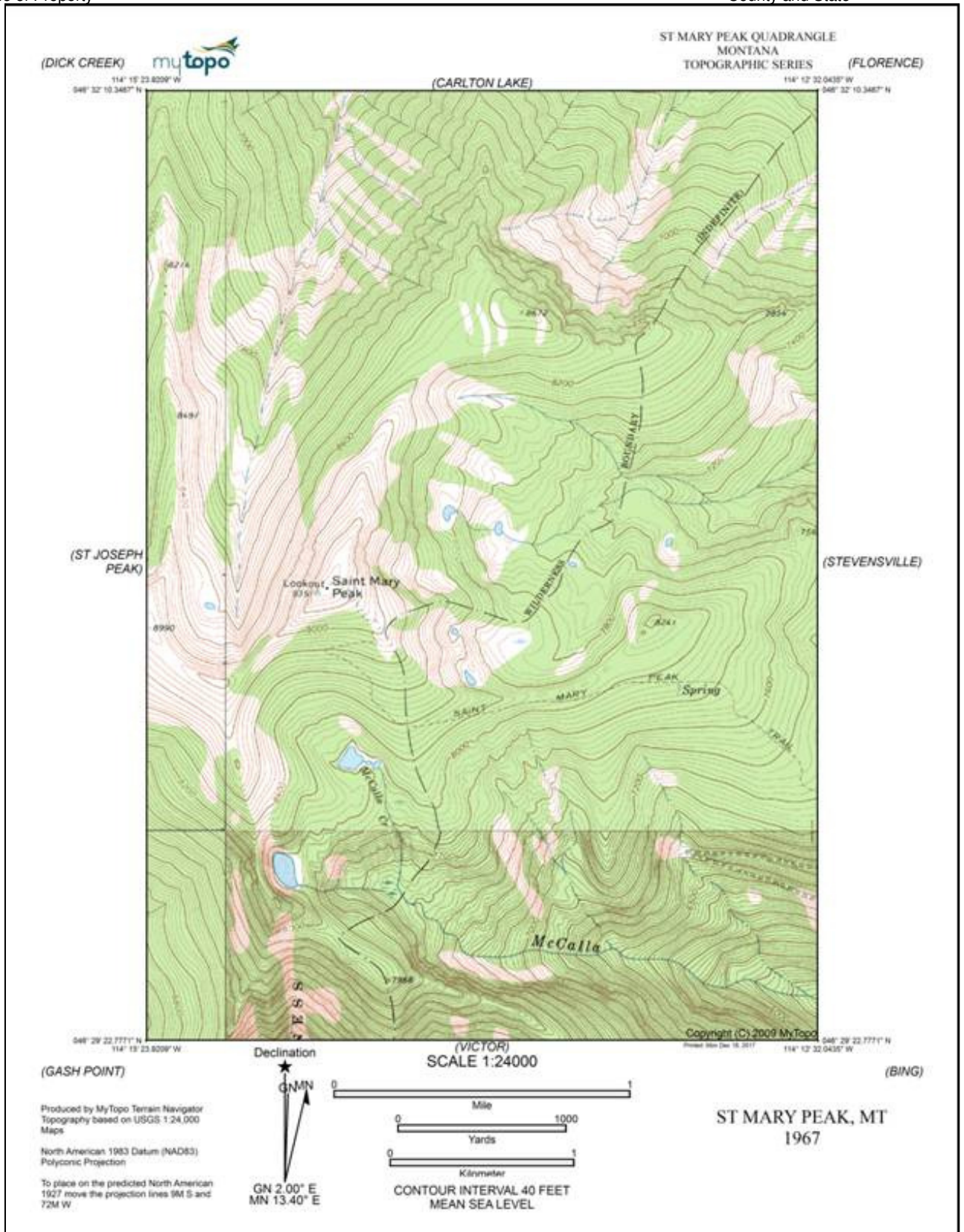
Additional Documentation

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.)

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St. Mary Peak Lookout Site Plan

St. Mary Peak Lookout
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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:

City or Vicinity:

County: Ravalli

State: Montana

Photographer: Janene Caywood

Date Photographed: August 15, 2017

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

1 of ____.

MT_RavalliCounty_ _0001.

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.

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MT_RavalliCounty_StMaryPeakLookout_0001. Looking southwest to the east (front) and north walls of the lookout.

St. Mary Peak Lookout
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MT_RavalliCounty_StMaryPeakLookout_0002. Looking northeast to the west and south walls of the lookout.

St. Mary Peak Lookout
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MT_ RavalliCounty_StMaryPeakLookout_0003. Looking east: detail of the stairway.

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MT_RavalliCounty_StMaryPeakLookout_0004. Looking west along the north side of the catwalk to the stairway.

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MT_ RavalliCounty_StMaryPeakLookout_0005. Looking northeast to the door and entry from the interior of the lookout cab.

MT_

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MT_ RavalliCounty_StMaryPeakLookout_0006. Interior: Osborn fire finder and stand.

St. Mary Peak Lookout
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MT_ RavalliCounty_StMaryPeakLookout_0007. Interior platform bed with drawers.

St. Mary Peak Lookout
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MT_ RavalliCounty_StMaryPeakLookout_0008. Interior wood stove.

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MT_ RavalliCounty_StMaryPeakLookout_0009. Looking west from the lookout catwalk over the concrete piers that mark the location of the earlier lookout. Note the modern hitching rail adjacent to the northeast pier.

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MT_RavalliCounty_StMaryPeakLookout_0010. Looking east to the toilet seat and step over the pit toilet.













NOTICE

Handwritten notice on a piece of paper, partially obscured by other items.

REDUCED AA

AA

Handwritten label on a blue plastic bin, possibly reading "Cable Ties".









UNITED STATES DEPARTMENT OF THE INTERIOR
NATIONAL PARK SERVICE

NATIONAL REGISTER OF HISTORIC PLACES
EVALUATION/RETURN SHEET

Requested Action: Nomination

Property Name: St. Mary Peak Lookout

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

State & County: MONTANA, Ravalli

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: MP100002299

Nominator: State

Reason For Review:

Accept Return Reject 4/6/2018 Date

Abstract/Summary Comments: The St. Mary 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 a 14' x 14' cabin set atop a substantial rock foundation. 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 NR Criteria A and C

Reviewer Paul Lusignan Discipline Historian

Telephone (202)354-2229 Date 4/6/18

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.



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:

- | | |
|--------------------------------|----------------------------|
| Gird Point Lookout | in Ravalli County, Montana |
| Medicine Point Lookout | in Ravalli County, Montana |
| St. Mary Peak Lookout | in Ravalli County, Montana |
| Gardiner Peak Lookout | in Idaho County, Idaho |
| Salmon Mountain Lookout | 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

Board of Directors
Gary Macfarlane, ID
President
Franz Camenzind, WY
Vice-President
Jerome Walker, MT
Secretary/Treasurer
Marty Almquist, MT
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Senior Advisor
Stewart M. Brandborg

Executive Director
George Nickas

Advisory Council
Magalen Bryant
Dr. Derek Craighead
Dr. M. Rupert Cutler
Dr. Roderick Nash

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 and
Alexis_Abernathy@nps.gov

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 Peak¹ 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.² 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

¹ 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.

² 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,



George Nickas, Executive Director
Wilderness Watch



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