

# THE MONTANA DEPARTMENT OF MILITARY AFFAIRS BIENNIAL REPORT ON HERITAGE PROPERTIES

REPORT TO THE MONTANA PRESERVATION REVIEW BOARD FOR 2012-2013

**SUBMITTED BY**

MT Department of Military Affairs  
Environmental Division  
1956 MT Majo Street  
Fort Harrison, MT 59636

**PREPARED BY**

Dagny K. Krigbaum  
Historical Discoveries  
713 S. 5<sup>th</sup> W. Street  
Missoula, MT 59801

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**H**istorical  
**D**iscoveries

*cultural resource management services  
713 S. 5th W.  
Missoula, MT 59801*

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*Cover photo: circa 1942  
James Clayton and First Special Service Force at Fort Harrison, courtesy of James Clayton family and  
[www.firstspecialserviceforce.net](http://www.firstspecialserviceforce.net)*

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## LIST OF ACRONYMS

Board	Montana Preservation Review Board
COE	U.S. Army Corps of Engineers
CRM	Cultural Resource Manager
DMA	Department of Military Affairs
DNRC	Department of Natural Resources and Conservation
ICRMP	Integrated Cultural Resource Management Plan
MTARNG	Montana Army National Guard
NGB	National Guard Bureau
SHPO	State Historic Preservation Office
VA	Veteran's Affairs Division

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## ***A. HERITAGE PROPERTIES MANAGED BY THE DEPARTMENT OF MILITARY AFFAIRS***

### ***Introduction***

The Montana Department of Military Affairs (DMA), which oversees the operations of the Montana Army National Guard, is proud to report success in evaluating undertakings from a cultural perspective and properly managing all areas of activity that have the potential to affect cultural resources. Within the last two years the DMA has improved its inventory and management of cultural resources by initiating a preservation plan for a historic district, seeking a finding of effect on cultural resources located in training areas, conducting visual impact assessments for new construction, initiating an interpretive project at the Fort Harrison cantonment, and continuing to execute long-term contractual agreements with consultants that aid the DMA in meeting their cultural resource responsibilities. No heritage properties have been lost or have had to be mitigated within the past two years.

### ***The Number and Type of Heritage Properties Managed by the DMA***

The DMA does not manage any heritage properties on state owned land, but is a steward of cultural resources located on leased lands that are eligible for listing in the National Register of Historic Places through a consensus determination with the Montana State Historic Preservation Office (SHPO).

Statewide, the Montana Army National Guard (MTARNG) manages over two hundred and twenty five buildings and structures and approximately 28,000 acres within 25 sites. These sites include Fort Harrison, located in Lewis and Clark County, the Limestone Hills Training Area located in Broadwater County, the Waco training area in Yellowstone County, lands at Fort Missoula, and National Guard Readiness Centers (armories) located throughout the state.

### ***Why The DMA Is Not Reporting On Any State Owned Heritage Properties***

Because the DMA does not manage any heritage properties on state owned land, the department is not reporting on any state owned resources. With the exception of one archaeological site located on state leased land, all of the heritage properties identified and/or managed by the DMA, including the historic buildings within the cantonment at Fort Harrison and historic and prehistoric sites located within the boundaries of MTARNG training areas, are located on federal and private lands that are leased to the agency.

The DMA did not report on any state owned resources in the last biennial report (2012). As advised by SHPO the DMA did, however, report on the one and only heritage property that they manage on state leased land. The DMA received feedback on behalf of the Preservation Review Board regarding the last report, which stated that it was well organized and concise and that the DMA reported on the status, condition and integrity of resources appropriately. However, the Board also stated that “*The crux of the matter is that DMA does not take responsibility for resources that they manage on state or federally-owned land that they lease (Light, 2012).*” Considering the requirements of SB3 to report only on state-owned heritage properties, this sentiment created some confusion as to how the DMA should generate this year’s report. Because the 2012 report indicated a lack of eligible resources on DMA owned land, the heritage properties discussion was brief, and therefore the Board may have assumed that the department was minimizing it’s overall cultural resource management responsibilities.

Because the Montana Department of Military Affairs is a state agency that manages and maintains heritage properties that are not on state owned lands, the department recently consulted with SHPO and

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the Montana Preservation Review Board (Board) in order to clarify their reporting status and to determine the most appropriate method for the agency to report on heritage properties under SB3.

According to recent communications with the State Historic Preservation Office and feedback from the Preservation Review Board, Senate Bill 3 does limit SB3 reporting only to State “*owned*” lands, and therefore, the DMA has been advised that they should not report on heritage properties that they manage on leased land, including those on state leased land (Baumler, 2013). Upon advisement, the DMA will not be reporting on the one heritage property (Pilgrim Tipi Ring Site-24BW0675) that is located on lands that it leases from the state (administered by the Department of Natural Resources and Conservation (DNRC)). The DMA and the DNRC archaeologist have agreed that the DNRC will report on the Pilgrim site in future reports (Rennie, 2013). The SHPO is aware of this reporting conflict and has updated their database to reflect the fact that currently, the DMA does not manage any heritage properties on state lands. However, there is some question on the part of SHPO and the Board as to the accuracy of DMA’s land ownership reporting, in part due to an online site that falsely indicates that the lands that make up the Fort Harrison cantonment (and therefore, the historic buildings on those lands) are state owned. The SHPO and the Board would like the DMA to clarify this reporting issue.

Due to the confusing nature of the DMA’s management of leased lands and cultural resources, especially historic properties located within the Fort Harrison cantonment, and in order to clarify and fully justify why the DMA is not responsible for reporting on any state owned heritage properties, the Preservation Review Board has requested that the DMA include the following information in this biennial report:

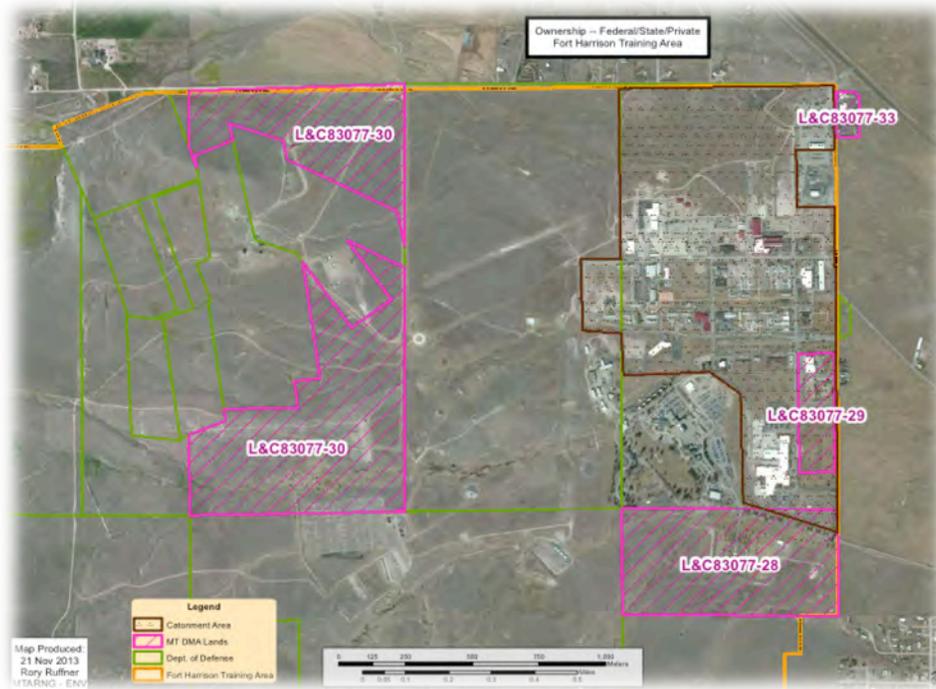
- A discussion of the Fort Harrison cantonment as a state-owned heritage property.
- A discussion of any potential heritage properties that are 50 years old that have yet to be indentified, recorded and evaluated; and discuss the DMA’s effort to identify its state-owned heritage properties.
- A discussion of the DMA’s consultation with SHPO during the period of reporting (2012-2013), both as agents for the federal government under the National Historic Preservation Act (Section 106/110) and/or as a state agency under the State Antiquities Act.
- Update the Board on DMA policies or plans regarding stewardship of heritage properties owned or managed by DMA.

Because of the Board’s specific requests, the report format and the information presented here deviates from the standard SB3 reporting requirements in that it concentrates more on the accuracy of the DMA’s reporting efforts and clarification of information, and in order to do so reports on the status of heritage properties that are located on federally owned lands within the Fort Harrison cantonment. Additionally, the DMA would like to take this opportunity to offer the Board some insight into how the DMA manages cultural resources, regardless of surface ownership.

### ***Identification Efforts for Undiscovered, Undocumented or Unevaluated Properties***

In order to avoid further confusion it should be noted that the DMA does manage lands that are owned by the department, but none of the state-owned parcels contain heritage properties. For instance, a majority of the parcels that house the state’s National Guard Readiness Centers, including the Womack armory at Fort Harrison, are state owned. The DMA also owns state land that is utilized for training purposes (located to the west of the Fort Harrison cantonment), as well as parcels to the south and east of the cantonment, one of which is managed by the Montana Veterans Affairs Division (VA).

Figure 1. Land ownership at Fort Harrison (state lands are outlined in pink). Parcel number L&C83077-29 inside of the cantonment area is the location of the Womack Armory (Ruffner, 2013).



As part of this reporting session’s identification efforts, the author of this report conducted an in-depth existing data review of cultural investigation reports, site forms and property ownership surveys to make certain that no previously identified heritage properties exist on state lands owned by the DMA. Additionally, this effort involved reviewing the data to ensure that proper methodologies were utilized for investigating state lands and that all resources were evaluated for their National Register eligibility. The author verified that a majority of all of the DMA’s state owned lands have been surveyed; that cultural resources have been properly documented and evaluated; and that no heritage properties exist on those parcels. In regard to the National Guard Readiness Centers, the author has verified that all but one of the state’s armories that has reached 50 years of age has been evaluated using National Register criteria, and none of the armories that have been documented meet the National Register criteria as independent elements. The original armory survey was conducted nearly four years ago, but the survey was updated and filed with SHPO during this reporting period.

Last year the DMA determined that a preservation plan should be put in place for the historic district located at Fort Harrison, and that a two phase interpretive project for the district would help bring the resource to life and allow visitors to take home a deeper appreciation for the history of the state’s National Guard. The district’s preservation plan is currently being drafted and is expected to be complete by the spring of 2014. The DMA will implement the preservation plan upon review and consultation with SHPO, which is expected to result in a Programmatic Agreement. Phase I of the historic district’s interpretive plan has already been completed, which includes: the design of a self-guided walking tour and a tri-fold brochure; the design of an interpretive kiosk and 16 interpretive displays; and a visual impact assessment of historic properties potentially affected by the construction of the interpretive displays. Phase II of the interpretive plan is in process, which includes the actual construction and placement of the signage and printing the brochure.

Other identification and documentation efforts this reporting session include seeking a finding of effect on cultural resources within drop zone training areas and a review of DMA managed buildings to determine whether or not there are buildings that need to be evaluated using National Register criteria.

Although a majority of the lands that make up the drop zones are relatively small training areas that have been included in larger Class III cultural investigations, the DMA has not formally conducted a finding of effect for resources within the zones, and therefore began doing so this last year. The drop zones are utilized for special operations training, a majority of which includes airborne operations. Identification efforts for the zones included: an in-depth review of previous cultural investigations within the zones; mapping site locations; reviewing resource eligibility; surveying areas that had not been previously surveyed; and re-surveying areas that were surveyed using transect widths that are wider than current standards allow. A finding of effect on cultural resources located on two of the three major drop zones have been completed during this reporting period.

The building review determined that all but one of the armories located throughout the state have been evaluated, but several organizational and vehicle storage facilities that are just over 50 or are about to turn 50 years old are in need of being evaluated to determine their significance. The buildings in need of evaluation are listed in the following table.

*Table 1. DMA managed buildings in need of National Register eligibility assessment.*

<b>Location</b>	<b>Building number</b>	<b>Building date</b>	<b>Purpose</b>
Fort Missoula	350	1960	Vehicle storage
Fort Missoula	351	1963	Flammable materials storage
Glasgow	RC	1965	Armory
Glasgow	A3	1965	Organizational storage
Helena	FMS03M1	1957	Organizational storage
Helena	FMS03M2	1957	Storage, general purpose
Helena	FMS03M3	1958	Vehicle maintenance shop
Helena	FMS03M4	1957	Storage, general purpose
Fort Harrison	517	1964	LOG/Troop CMD

## ***B. THE STATUS AND CONDITION OF HERITAGE PROPERTIES***

### ***Land Ownership and a Brief Description of the Fort Harrison Historic District***

A majority of the Fort Harrison cantonment is made up of modern training and administrative buildings, but a centrally located area is home to some of the earliest permanent structures within the cantonment. A majority of these historic buildings make up the Fort Harrison Historic District, and several additional historic buildings are located adjacent to, but outside of the district boundary. The cantonment is utilized by civilian and non-civilian workers and is located on federal property that is licensed to the State of Montana by the U.S. Army Corps of Engineers (COE). The license is an agreement merely for the use of the property in a certain way, but it is not owned by a state agency. The COE is the holder of property deeds to all Department of Army lands, and therefore the lands remain federal property along with any improvements on the land. The buildings and structures within the cantonment, which include those that make up the historic district, remain federal property as well.

By clarifying that the land at Fort Harrison is federal property, which was also stated in the 2012 report, this is in no way meant to indicate that the DMA is not responsible for managing cultural resources on

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these lands, when in fact the agency actively manages both the land and buildings at Fort Harrison. For the most part, the DMA maintains the cantonment area through federal funds that are rolled into state coffers.

As previously discussed, the historic district at Fort Harrison is not on state owned land, but as part of a requested discussion by the Board, the DMA would like to take this opportunity to report on the status and condition of the Fort Harrison Historic District.

The buildings that make up the historic district and the larger cantonment area represent the state's principal training facility for the state's National Guard units as early as 1925, and is Montana's original and only permanent MTARNG training facility. The district represents the core of the cantonment and is eligible for listing under National Register Criterion A, for its association with events that have made a significant contribution to the broad patterns of the state's military history (Caywood, 2003). The district is made up of 16 contributing elements and 5 noncontributing elements. It is located on approximately 16 acres and contains most of the permanent buildings constructed during the initial development program (1926-1939), as well as several World War II temporary buildings remodeled for use after the war, and three buildings completed between 1961 and 1963.

*Figure 2. Photographs of the Fort Harrison Historic District (clockwise from upper left): Circa 1926-1942 Museum complex; 1926 clay tile Company Kitchens; the 1942 Fort Harrison Chapel; and the circa 1962 103<sup>rd</sup> Public Affairs Detachment building with the 1935 Service Club in background.*



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### ***The Status and Condition of the Fort Harrison Historic District***

The status of the historic district at Fort Harrison is “Satisfactory” in that negative impacts to the overall integrity of the district are unlikely to occur, but the status is also “Improving” in that actions have been underway in consultation with SHPO to not only ensure that future impacts do not occur, but to improve the management of the district. These actions include initiating an interpretive project, conducting visual impact studies for construction taking place outside of but within view of the district, and creating a preservation plan for the district.

Although the overall integrity of the district is satisfactory, several individual elements (buildings) are considered “Endangered” in that negative impacts have already occurred and are unlikely to improve. The endangered status applies to four buildings that have been condemned for decades, as well as a few buildings that are in need of window and door replacements, all of which have been documented as contributing elements in the district. The condemned buildings include two Company Kitchens and two latrines that were constructed between 1926 and 1937.

The overall integrity of the district is “Fair” to “Good.” A majority of the resources occupy their original location, possess a majority of the integrity of materials, workmanship and design, and retain their associations as the guard’s principal training facility during the established period of significance (1926-1963). However, the integrity of feeling and association has been somewhat compromised, in part due to the fact that the district is centrally located within a much larger, modern campus setting that is continuing to grow. The campus setting is made up of contemporary buildings and landscapes as well as modern signs and structures, all of which are highly visible from within the district boundaries and challenge the districts overall integrity of feeling and association.

The primary historic fabric of the buildings is generally good, with many of the buildings receiving regular maintenance and upgrades, but a few others are in need of work. For instance, the circa WWII Thrift Shop complex buildings (numbers T-21, T-23, T-28 and T-31) are in need of window replacements and the removal of boards covering window and door openings. As previously mentioned, the condemned Company Kitchens (T-102 and T-103) and latrines (T-29 and T-34) were constructed as temporary structures and are dilapidated.

### ***C. STEWARDSHIP EFFORTS AND COSTS***

#### ***Greater Awareness and Ability***

Coordination and staffing procedures are critical for cultural resources stewardship and compliance. In the past two reporting cycles the DMA has actively pursued stewardship, initiated consultation with SHPO on all cultural resource projects, and has continued to focus on educating the various departments within the DMA of actions that trigger internal coordination and compliance.

#### ***Stewardship Efforts***

In the past two years the DMA has not only significantly improved their overall management of cultural resources, but have undertaken efforts to improve the status and condition of the historic district at Fort Harrison. The DMA has initiated an interpretive walking tour for the district; conducted a visual impact assessment and consulted with SHPO in regard to the type of signage most appropriate; worked with the architecture specialist at SHPO to find an appropriate replacement for the windows in one of the contributing buildings; begun drafting a preservation plan; and conducted five visual impact assessments for new construction that was within view of the district. The visual impact studies were conducted in

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order to determine if new construction or renovation undertakings would cause a significant change in the aesthetic values of the district or the surrounding landscape. Additionally, the studies identified significant historic properties outside of the district but within view of the project area, and made recommendations for reducing project impacts, if any existed.

The historic district at Fort Harrison has received much care and attention this reporting session in that some upgrades to historic buildings have occurred, while proposed actions meant to temporarily protect buildings have been abandoned at SHPO's request because the actions did not meet the Secretary of Interior's guidelines for preservation. Additionally, phase I of an interpretive plan for the district has been completed in which the walking tour and the design of an interpretive kiosk and 16 interpretive displays have received concurrence from SHPO. To date, the kiosk and 5 of the 16 displays have been constructed, and the signage is expected to be placed throughout the district this coming spring.

The purpose of the Fort Harrison cantonment interpretive project is to educate the public about Fort Harrison, the MTARNG and the cantonment and training area, and their respective roles in local, state and national military history. The project will provide educational and interpretive opportunities that will enhance visitors' understanding and appreciation of Fort Harrison from 1892 to present; the MTARNG's cantonment and training area from 1925 to present; the MTARNG from its beginnings as a militia in 1867 to present; and encourage the protection and preservation of Fort Harrison's historical, cultural and natural resources.

The DMA realizes the benefits of interagency partnership efforts but outreach in regard to heritage properties has been minimal this reporting session. The DMA has, however, worked directly with the Montana Veteran's Affairs to conduct an archaeological survey and a visual impact assessment for expanding and upgrading the Veteran's Cemetery (administered by the VA) and is currently consulting with the Bureau of Land Management in seeking a finding of effect on cultural resources located within a drop zone training area.

### ***The Costs of Stewardship***

No costs were incurred this past biennium from the stewardship of heritage properties located on state owned lands, but the DMA has invested money into the research, development and protection of the historic district located at Fort Harrison.

The investments at Fort Harrison has the potential to increase the value of both the land and the buildings within the cantonment, and the interpretive media proposed for the district will likely result in a beneficial effect by bringing to life the history of the area while offering visitors and those who work and train at Fort Harrison to take home a deeper appreciation for the history of the state's National Guard and the individual elements that make up the district. The investments can also generate word-of-mouth advertising and repeat visitation, which can add up to increased tourism.

Nearly all of the costs for the DMA's stewardship of cultural resources at the cantonment this past biennium have been for conducting visual impact assessments, cultural inventories, upgrades to historic buildings and pursuing the creation of an interpretive historic district and a district preservation plan. The total cost of stewardship for these undertakings came to \$214,400.00. A majority of this total was utilized for interpretive signage and building rehabilitation, which are seen as investments that increase the value of tangible assets. The preservation plan and visual impact assessments help ensure the long term integrity of the historic buildings and will therefore see financial benefits over time. The estimated total increase in value of heritage properties at the cantonment resulting from the DMA's stewardship efforts and

investment is approximately \$212,000.00. The table below is an itemization of the DMA's stewardship efforts for the Montana Army National Guard Cantonment Historic District.

*Table 2. Stewardship efforts/investments for the Cantonment Historic District (2012-2013).*

<b>Type of stewardship efforts/investment</b>	<b>Cost</b>
Heritage Property Administration/Operations (only for buildings located with the Fort Harrison historic district)	\$ 2,400.00
Heritage Restoration/Rehabilitation/Repair project activity	\$ 90,000.00
Heritage Preservation/Protection project activity & consultation	\$ 23,000.00
Heritage Interpretation/Education/Awareness project activity	\$ 93,000.00
Heritage Preservation/Conservation Plan Development	\$ 6,000.00
<b>Total stewardship cost</b>	<b>\$ 214,400.00</b>

### ***Consultation and Heritage Property Identification Efforts***

The DMA has consulted with SHPO a total of 11 times in regard to cultural resources this past biennium. The consultations included a wide range of cultural studies that fall under Section 106 regulations, but there were no undertakings that fell under the State Antiquities Act. With the exception of one undertaking, all of the visual impact studies, archaeological surveys, and determinations of no adverse effect that were reviewed by SHPO in the past two years have received concurrence.

The single undertaking that did not receive concurrence was rectified by the DMA by formally agreeing to take no action. The undertaking involved a proposal to replace existing wood window covers (boards) that have deteriorated over several decades in contributing buildings that are leased to the National Guard Thrift Shop (a non-profit organization). Replacing the window openings with historically accurate windows is preferred, but is not an option at this time due to funding restrictions by the National Guard Bureau. It is unknown when the original windows were removed and/or covered with wood, but it is believed to have occurred sometime in the 1970s. The deteriorated wood covers over the window openings have left the four buildings exposed to the elements and have added significantly to heating costs.

The following table illustrates the cultural identification and consultation efforts that have taken place during this reporting session, as well as the outcome of each project.

*Table 3. Cultural identification and consultation efforts.*

<b>Project name and location</b>	<b>Year completed</b>	<b>Description</b>	<b>Outcome</b>
Medical Clinic-building numbers T-75 & T-76 located at Fort Harrison	2012	Section 106 visual impact study for remodeling two WWII era buildings within view of a district and an independently eligible building	Concurrence from SHPO
Barracks at Fort Harrison	2012	Section 106 visual impact study for the painting of historic barracks buildings located within the Fort Harrison historic district	Concurrence from SHPO

Montana Armory Survey	2012	Updated Historic Property Records for armories located in Montana that either meet or are close to meeting the National Register age criteria.	Filed with SHPO
Fencing property within a historic district at Fort Missoula	2012	Section 106 visual impact study regarding an undertaking to construct a wood jackleg fence within a historic district located at Fort Missoula, Montana	Concurrence from SHPO
Sale/transfer and new construction of an armory in Miles City, Montana	2012	Section 106 study of the sale/transfer of the Miles City Armory and visual impact study for new construction.	Concurrence from SHPO
Original Fort Harrison Thrift Shop building complex proposal (building numbers T-21, T-23, T-28 and T-31)	2012	Section 106 study of proposed upgrades and renovations to four historic buildings that make up the National Guard Thrift Shop complex.	Initially the DMA received non-concurrence from SHPO  Project revised-no action taken on the part of the DMA for three of the four buildings; Conducted new study.
Building 405 located at Fort Harrison	2012	Section 106 visual impact study regarding new construction (addition to a building) within view of potentially eligible buildings	Concurrence from SHPO
Follow up Thrift Shop building complex consultation	2013	Consultation with SHPO; formal agreement to take no action for 3 of the 4 buildings and replace windows in building T-31 with historically accurate windows.	Concurrence from SHPO
Cantonment Historic District-Interpretive project phase I (implementation)	2012-2013	Design of kiosk and interpretive panels  Design of a tri-fold brochure	Design completed
Cantonment Historic District-Interpretive project phase I (visual)	2013	Section 106 visual impact assessment of a proposed interpretive kiosk and 16 interpretive displays located within a historic district	Concurrence from SHPO

Cantonment Historic District-Interpretive project phase II	Current	Construction of the interpretive signage and printing the brochure	5 of the 16 interpretive panels are complete but have not been put up. They will be put up this spring (2014)  The remaining 11 interpretive panels are not completed yet but the kiosk has been constructed. Panels may be completed by spring of 2014
Drafting a historic preservation plan	Current	Drafting a historic preservation plan for the Cantonment District at Fort Harrison	Due spring of 2014 and will be sent to SHPO for concurrence
Heritage Properties Biennial Report	2013	Consultation with SHPO and Preservation Review Board regarding the DMA's leased lands and SB3 reporting requirements	Written communication from SHPO requesting specific information to be addressed in this biennial report
Montana's Veteran's Affairs Cemetery Expansion	2013	Section 106 study seeking a finding of effect on resources located within the expansion area and a visual impact assessment for new structures	Concurrence from SHPO
Class III investigations of the Marshall Drop Zone located at Fort Harrison	2013	Section 106 study seeking a finding of effect on resources located within the drop zone training area	Concurrence from SHPO
Class III investigations of the Copenhagen Drop Zone located in the Limestone Hills Training Area	2013	Section 106 study seeking a finding of effect on resources located within the drop zone training area	Study completed; currently being reviewed by the DMA and Bureau of Land Management
Class III investigations of the Diehl Drop Zone located near Canyon Ferry Reservoir	Current	Section 106 study seeking a finding of effect on resources located within the drop zone training area	Study is delayed due to lack of ground surface visibility. Will be completed in spring of 2014

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#### ***D. MAINTENANCE NEEDS FOR HERITAGE PROPERTIES***

Neglect caused by lack of adequate financial support can erode the physical and historical attributes of heritage properties, and the DMA believes that financial support and upgrades for some of the historic buildings at Fort Harrison is necessary to carry out the agency's stewardship responsibilities. The buildings that make up the historic district as well as the independently eligible Theatre (1942) located within the cantonment are the only eligible buildings managed by the DMA.

Maintaining and improving the status of heritage properties, regardless of surface ownership is a priority of the DMA. Site avoidance is often the preferred measure for protecting archaeological resources in areas that are not subject to ground disturbing activities, but when it comes to maintaining historic buildings the DMA takes an active approach in that it focuses on routine maintenance and upgrades whenever possible. The DMA seeks ways to better utilize historic buildings and has been working to upgrade numerous WWII era buildings with higher efficiency windows, doors and insulation. All upgrades and renovations to WWII era buildings within the past two years, regardless of the building's eligibility have been approved by SHPO. Consultation with SHPO takes place regardless of whether the buildings meet the National Register criteria for eligibility or not, because the renovations often not only effect the building itself, but have the potential to effect historic structures within view of the renovations.

Direct impacts to historic buildings have not occurred in the past two years, but there are measures needed to address potential indirect impacts to buildings within Fort Harrison's historic district. For instance, an indirect impact could be caused by a lack of funds for repair. Funds for regular maintenance and upgrades are controlled by the National Guard Bureau and are directly related to a building's classification. The building classification system and how it relates to funding is fully explained in the next section of this report.

Buildings that are in need of maintenance and/or upgrades at this time include the four buildings that currently serve as the National Guard Thrift Shop complex, which have missing windows and openings that have been boarded over for decades. Removing the boards that cover the window openings and replacing them with historically appropriate windows will add to the integrity of each building as well as to the districts overall integrity of feeling and association. The DMA is aware that the replacement of windows in a historic building should not only emulate the look of the original windows but also utilize the same materials if possible, and this is the "preferred" option for preservation of historic structures. However, due to a lack of funding, these preservation methods are not currently an option. For this reason, the DMA recently proposed re-covering the window openings with new wood because the old wood has deteriorated and left the buildings open to the elements. The proposal was seen as a temporary fix that would stave off further deterioration of the structures and help with energy bills for the non-profit business that leases the buildings. As previously discussed, SHPO did not concur with the proposed action and asked that the DMA either fill all openings with historically accurate windows or take no action at all (Brown, 2013). As advised, the DMA has agreed to take no action regarding the window coverings, which will likely speed the deterioration of these buildings.

*Figure 3. Three of the four buildings (with boarded windows) that make up the Thrift Shop complex.*



The Thrift Shop complex has been leased to a non-profit since the 1970s (National Guard Thrift Shop) and is not necessarily managed on a daily basis by the DMA. However, the DMA has recently taken steps to aid the non-profit in upgrading the buildings, and the non-profit recently replaced rotting window frames with historically accurate windows on one side of one of the four buildings. The DMA aided the non-profit by initiating a study to determine a historically accurate style of window replacement and consulted with SHPO in order to receive project concurrence. It is the DMA's intention to continue working with the non-profit toward upgrading the Thrift Shop complex in the future.

### ***How Maintenance/Rehabilitation Needs Are Classified by the National Guard Bureau***

The DMA would like to take this opportunity to explain how buildings are classified and how the classification system directly relates to financial benefits or restraints regarding historic buildings within Fort Harrison's historic district. It is important to understand the DMA's funding in order to understand how and why resources are managed in a certain way.

The National Guard Bureau (NGB), who uses certain criteria to determine the financial needs of a property, typically controls funds for renovation and rehabilitation. Generally speaking, the NGB does not financially support buildings that are not utilized for military training or administration purposes, or buildings that are not serviceable for a useful purpose. Therefore, historic buildings that are in use and optimized by the DMA are well funded and managed, while those that are not receive less attention.

Unfortunately, for historic buildings within the district that are condemned or are not optimally utilized, upgrading and renovating is rarely an option due to budget restraints or a complete lack of funding. When this is the case a building is either very minimally maintained, which is often accomplished by replacing

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building components piece-meal in order to avoid further deterioration (i.e. secondary storage facilities), or no action is taken at all (i.e. for condemned buildings).

The DMA is required to submit periodic information on real property to ensure that properties are being used and managed effectively. The information is submitted to the NGB in various forms, and essentially covers the overall functional nature of a property. The property information is then utilized through cycles of budgeting, accounting, programming and reporting when processing maintenance, construction, inventory and disposal actions. Property information, classification and building assignment records for assets within the Fort Harrison cantonment includes information regarding: facility type; facility description; type of construction; square feet of a building; building date; condition; capital improvements; and investment categories. The information helps the DMA and the NGB determine: whether or not a building is serviceable for a useful purpose; whether a property is essential to program requirements; whether or not it is adequate for approved future programs; and whether or not the property is managed economically. Essentially, the MTARNG's mission dictates a property's use, but as a rule the department will not increase its real property holdings to meet a military need until every effort has been made to efficiently use available property.

Examples of how the building classification system can complicate the funding and management of a building is evident when discussing both condemned buildings and the Thrift Shop complex located within the Fort Harrison Historic District. The four condemned buildings located within the district (which are all contributing elements) are classified as buildings that receive no support from the NGB. This "no support" classification applies to building numbers T-29, T-34 (company latrines), T-102 and T-103 (company kitchens/dining facilities) within the district, as well as building numbers T-107, T-207, T-210 (company latrines) and the WWII era theatre (T-77) located outside of the district boundaries. The National Guard Bureau does not allow the DMA to spend money on rehabilitating a building that is beyond its usefulness and has indicated that no federal funds will be used to maintain or preserve buildings that fall under a "no support" designation. Although they still stand, these condemned buildings have been vacant for decades and have been slated for demolition since the 1990s.

The Thrift Shop complex is made up of buildings that are utilized for both storage and retail purposes, but each of the buildings have been partially or fully boarded up for years. Like those that are condemned, these four buildings are also coded as building types that receive "no support." Therefore, the DMA does not maintain the Thrift Shop complex except for basic infrastructural items. The buildings are, however, in much better overall shape than the condemned buildings due to the efforts of the Thrift Shop personnel.

It should be noted that the DMA is not simply able to reclassify buildings in order to rehabilitate them because they would first have to be reclassified into a usable status. The DMA would have to prove how reuse of a building that is currently condemned and in total disrepair is economical. This is not to say that the DMA has not investigated the possible rehabilitation of some condemned buildings. The DMA hired an architect approximately four years ago to assess the cost of bringing the WWII era Theatre up to current occupancy standards, but because of its advanced state of deterioration, the rehabilitation was expected to range anywhere from \$600,000.00 to over 1 million dollars. The NGB did not consider the cost of rehabilitation economical for a condemned building with no foreseen use.

*Figure 4. Condemned buildings—Building numbers T-102 and T-103 (clay tile Company Kitchens) located within the historic district and the independently eligible Theatre located outside of the district.*



## ***E. RECORD OF COMPLIANCE WITH THE MONTANA STATE ANTIQUITIES ACT***

### ***Preservation Policy and Practice***

The purpose of the DMA cultural resources program is to support the DMA mission, achieve regulatory compliance, and ensure that DMA stewardship responsibilities are met. For the past biennium these responsibilities have fallen to the Environmental Manager, who also serves as the Cultural Resource Manager (CRM). The Environmental Manager and the Facility Management Office staff work with consultants who aid the DMA in meeting their cultural resource responsibilities.

To support the goals of the cultural resources program, the DMA has established measurable objectives to accomplish over a five-year period. These objectives were first developed and formally documented in a 2002 draft of the Integrated Cultural Resource Management Plan (ICRMP) for MTARNG Sites and

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Training Installations. These objectives are currently covered by the 2008-2012 Integrated Cultural Resource Management Plan. The ICRMPs are required by internal military statutes and regulations and are designed to support the military mission and assist individual installations in meeting the legal compliance requirements of state and federal historic preservation laws and regulations in a manner consistent with the sound principles of cultural resources stewardship. The ICRMP is currently being re-drafted to focus on a plan for 2012-2016. The 2012-2016 ICRMP will build upon the previously drafted ICRMP in terms of including those elements identified as significant issues by internal and external stakeholders during the review process. Internal and external stakeholders who participated in both the original and the revised ICRMP (2008-2012) include the DMA and National Guard Bureau personnel, the Montana SHPO, and representatives of American Indian tribes with ancestral lands that overlap DMA sites and training installations.

The ICRMP establishes priorities for the identification and standards for the evaluation of cultural resources within the MTARNG installation, and provides a schedule to accomplish program objectives. The ICRMP also provides a brief description of the MTARNG installation, an overview of known cultural resources across all DMA sites, the status of inventory and evaluation of resources at each site and training installation, and appropriate compliance and management activities for the established period. The CRM is responsible for maintaining the cultural resources program and is also responsible for reporting annually on the status and progress of the implementation of the ICRMP.

Compliance actions are completed by the DMA prior to any ground disturbance activities or construction projects. Each DMA staff member involved with planning, construction, building repair or maintenance, or management of training or other mission activities coordinates with the CRM in the planning process. For example, typical compliance actions triggered by the Montana State Antiquities Act would be to conduct a cultural survey on a newly acquired state lease land parcel or to determine if the viewshed from historic properties would be affected by the construction of a new structure or building. Fundamental to the DMA's cultural resources program is the identification of cultural resources and the evaluation of their eligibility for listing in the National Register of Historic Places. A successful cultural resource management program requires projects to identify and evaluate resources, implement protection and compliance actions, and collaborate with internal and external stakeholders to advance awareness and preservation.

The DMA maintains the buildings and landscapes associated with the state's readiness centers, renewable leases for state lands within the Limestone Hills Training Area, and a right-of-way easement for state lands within the Fort Harrison Training Area. The Montana Antiquities Act and the Montana Human Skeletal Remains and Burial Sites Protection Act applies on these state-owned lands. Although the Department of Defense maintains its sovereign immunity status on federal lands, such status does not carry over to non-federally owned lands used by the DMA by permit, lease, easement, or other use agreement. State regulations must be complied with, independent of federal requirements (e2M, 2008: H-7). Undertakings involving state owned properties, which include projects that involve MTARNG Readiness Centers, follow procedures stated in the Montana Antiquities Act.

During this reporting session, no projects have been proposed on state owned lands that have triggered the Montana State Antiquities Act. The 2012 sale/transfer of the Miles City armory was originally believed to fall under the Antiquities Act but in consultation with SHPO, it was determined that it was a Section 106 issue because it required federal approval. Therefore, no undertaking consultations occurred with SHPO pursuant to MCA 22-3-424 (1) and (2).

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### ***Training Opportunities***

Training for the DMA staff is a prerequisite for properly implementing the ICRMP and for good stewardship of cultural resources. Many training opportunities are available for environmental staff as well as non-environmental staff. It is preferable that the cultural resource manager shall have a basic knowledge of cultural resources management and education in a related field. Training for cultural resource management personnel include laws and regulation overview, section 106, maintenance of historic properties, preservation of cultural landscapes, Native American Graves and Repatriation Act, agreement documents, tribal consultation, and curation. Cultural resource management training courses usually range from 3 to 5 days.

For the CRM, training recommendations include:

- Primary Training – Section 106, American Indian consultation workshop, National Guard Bureau (NGB) CRM 101 class (offered every 2 years), and ICRMP workshop if available (offered every 4 or 5 years)
- Secondary Training – Agreement documents, Native American Graves Protection and Repatriation Act, and ICRMP workshop.
- Tertiary Training – Integrating GIS and cultural resources, and advanced section 106.

For environmental staff and the CRM, training opportunities include:

- NGB annual workshop (topics vary) – [gko/ngb.army.mil](http://gko/ngb.army.mil), and regional consultation workshops (two per year)
- Department of Defense Conservation Workshop (every 2 years)
- Advisory Council on Historic Preservation – [www.achp.gov](http://www.achp.gov)
- U.S. Army Corps of Engineers, Seattle District – [www.nws.usace.army.mil](http://www.nws.usace.army.mil)
- National Preservation Institute – [www.npi.org](http://www.npi.org)
- Civil Engineer Corps Officers School – [www.cecos.navy.mil](http://www.cecos.navy.mil) (e2M, 2008: I-7).

For non-environmental DMA personnel, training is crucial to ensure compliance with environmental laws and policies and protection of cultural resources. By interfacing with field commanders, project planners, facility managers, and the Adjutant General staff, the CRM can develop solutions and programs that blend with existing training opportunities and the MTARNG mission (e2M, 2008: I-7).

### ***Challenges and Successes in Identification, Evaluation and Protection***

The DMA has been successful in meeting their compliance responsibilities but continues to face challenges in identifying, evaluating and protecting heritage properties. One challenge is that although the DMA is capable of implementing the ICRMP, there is no guarantee that funds will be available from the NGB. An additional complicating factor for the DMA is that a majority of the lands used by the DMA are leased from other federal agencies and from private parties. The various agreements that permit the DMA use of these lands are often vague when it comes to describing which entity is responsible for taking the lead in cultural resource issues. However, the DMA initiates and takes the lead in identifying, documenting and evaluating cultural resources, regardless of surface ownership. The DMA treats the

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leased land as its own, and has been successful in meeting their cultural inventory responsibilities. The focus of the DMA this past reporting period has been to seek concurrence from SHPO on all projects, to seek a formal finding of effect for training areas, and to improve the historic district at Fort Harrison.

With more than 3,000 personnel working throughout the MTARNG and the DMA in both military and civilian jobs, integration and coordination among offices can be very challenging. Installation program managers manage multiple programs and it can be difficult to communicate with other offices on a regular basis. To effectively manage a cultural resources program, coordination is absolutely essential. The CRM makes sure other offices are aware of the cultural resource program's responsibilities, and offices communicate with the CRM so that the CRM is aware of activities that could potentially impact cultural resources. Additionally, long-term contractual agreements with two cultural resource management professionals aid the DMA in meeting their cultural resource responsibilities.

A focus on effective communication and coordination among the DMA personnel and professional consultants over the next biennium will allow the agency to efficiently meet their obligation of compliance with cultural resource legislation, while supporting the vital military mission at each of its sites and training installations. The DMA has set goals to go beyond minimal compliance, and to accept the leadership role that the State Antiquities Act envisions for state agencies to manage cultural resources in a spirit of stewardship for the inspiration and benefit of present and future generations.

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