

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

SUBMITTED TO THE MONTANA PRESERVATION REVIEW BOARD FOR THE 2016  
REPORTING YEAR

**SUBMITTED BY**  
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January 2016

*Cover photo: Looking along Company Street at the 1927 annual training camp at the Fort Harrison cantonment. Clay tile company kitchens and mess halls are seen at right, some of which remain at Fort Harrison.*

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

### ***Introduction***

The Montana Department of Military Affairs (DMA) is once again proud to report their success in evaluating undertakings from a cultural perspective and properly managing activities 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 conducting Class III archaeological surveys and visual impact assessments for new construction, determining the significance and National Register eligibility of eight DMA managed buildings and consulting with SHPO on seven undertakings. Additionally, the agency continues to execute long-term contractual agreements with cultural resource specialists that help coordinate consultation between the DMA and SHPO, and 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, which oversees the operations of the Montana Army National Guard (MTARNG), manages over two hundred and forty four buildings and structures and approximately 28,000 acres within 25 sites statewide. 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) throughout the state.

As discussed in the last biennial report, the DMA does not manage any heritage properties on state owned land. Given the nature of the agency's management of significant resources on federally leased land and the lack of heritage properties on state-owned land, the department has consulted with SHPO and 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. The Board reviewed the last report based on nationally recognized historic preservation standards, and recommended that the DMA report on the following:

- The status of the DMA's identification efforts regarding state-owned properties and verify that no state-owned heritage properties have been overlooked.
- The status of the Fort Harrison Historic District, even though it's federally owned.
- Correction of land ownership data errors on the state run Cadastral site, which have the potential to impede the DMA's future reporting efforts.
- The DMA's acknowledgement of the agency's responsibility for their resources through continued reporting of their stewardship efforts, regardless of land ownership.
- The DMA's pursuit of funds to assist with regular maintenance and/or upgrades of historic buildings, federally owned or otherwise (Gilmore, 2014).

Because of the DMA's unique land ownership status and the Board's specific requests, the report format and the information presented here deviates from the standard SB3 reporting requirements in that it concentrates on the stewardship of heritage properties, regardless of land surface ownership. In doing so, this report will discuss the status of heritage properties that are located on federally owned lands, many of which are located within the Fort Harrison cantonment.

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### ***Identification Efforts for Undiscovered, Undocumented or Unevaluated Properties on State Lands***

In order to avoid further confusion it should be clearly stated that the DMA *does* manage buildings on lands that are owned by the State of Montana. These state lands are home to the agency's Readiness Centers and associated training facilities, and are located throughout Montana. The DMA also aids in the stewardship of cultural resources that are located on state leased land. However, no heritage properties have been identified that are located on the state owned lands, and the Board has requested that the DMA not report on resources located on state leased land, as they are reported on by the managing agency.

In 2014 the DMA reported that one of the state's National Guard armories and several organizational and vehicle storage facilities, most of which are located on state land, had met the National Register age criteria and were in need of evaluation. A search was completed during this reporting cycle to review the age of every building and structure under the management of the DMA and resulted in a determination that a total of eight buildings were in need of evaluation, five of which are located on state land. All eight building surveys were completed during the past two years and are listed in the following table.

*Table 1. DMA managed buildings that were assessed for their National Register eligibility.*

Location	Building number	Building date	Land ownership	Purpose	National Register Eligibility
Fort Missoula	T-330	1940	Federal-Department of Defense (DOD)	Vehicle storage	Contributing element in historic district
Fort Missoula	351	1963	Federal-DOD	Flammable materials storage	Non contributing element in historic district
Glasgow	RC	1965	State-DMA	Readiness Center/armory	Not eligible
Glasgow	A3	1965	State-DMA	Organizational storage	Not eligible
Helena (Fort Harrison Annex)	FMS03-M1	1957	State-DMA	Field Maintenance Storage/Post Engineers building	Not eligible
Helena (Fort Harrison Annex)	FMS03-M3	1957	State-DMA	Vehicle maintenance shop	Not eligible
Helena (Fort Harrison Annex)	FMS03-M4	1957	State-DMA	Hazardous materials/storage	Not eligible
Fort Harrison	517	1963	Federal-DOD	Troop Command Company Headquarters	Not eligible

The DMA has been working diligently for the past several years to assess buildings for their historic significance, and is pleased to announce that all of the historic buildings and structures that meet the age criteria and are managed by the agency (regardless of land surface ownership) have been assessed for their National Register eligibility. Because there was a lull in construction associated with the Montana

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National Guard between the mid 1960s and the 1980s, a majority of the DMA buildings that have not been assessed were constructed after 1980 and will not meet the National Register age criteria for many years to come.

Prior to the completion of this report, the author conducted an in-depth search for cultural studies that cover the state owned training parcels and can verify that: all of the state owned lands have been surveyed; all of the buildings managed by the DMA that are 45+ years of age have been evaluated using National Register criteria; that cultural resources have been properly documented and evaluated; and that no heritage properties exist on state lands that are managed by the agency.

### ***Additional Stewardship Efforts (not on state lands)***

#### Preservation Plan

During the last reporting session the DMA determined that a preservation plan should be put in place for the proposed Fort Harrison Historic Cantonment District, 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 preservation plan was contracted to a cultural resource specialist in 2012 and a draft was completed in December 2014 (Caywood, 2014). The final draft has yet to be completed. The plan is expected to result in a Programmatic Agreement for routine maintenance of the buildings within the cantonment's historic district.

#### Interpretive Plan

Phase I of the historic district's interpretive plan was completed prior to the last reporting session and included: 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, which includes the actual construction and placement of the signage as well as the printing and placement of the brochures, was completed during this reporting session.

#### Eligibility and Visual Impact Assessments

Building 517 at Fort Harrison is one of the eight buildings that were assessed for their eligibility, but due to the proposed remodeling of the building and its proximity to the historic district, the study also included a visual impact assessment. The study was to determine if the undertaking would cause a significant change in the aesthetic values of the cantonment's historic district and resulted in a determination of no adverse effect, in which SHPO concurred.

The DMA was recently the proponent of a federal undertaking to sell the armory in Miles City. The building was constructed in 1956 during the Cold War era, and served as a National Guard Readiness Center for Custer County. The agency first conducted a study to determine if new construction would have an adverse visual impact on the area's historic properties. Additionally, a study was conducted in order to determine the eligibility of the existing armory. The study resulted in a determination that the new construction and the sale of the existing armory would not adversely affect historic properties. The DMA initiated consultation with SHPO in 2013 regarding the visual study, and again in 2014 regarding the sale of the complex, in which the agency asked for and received project concurrence.

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### Class III Inventories

Several Class III cultural inventories have been completed in existing and newly proposed training areas. Two surveys were conducted in the Limestone Hills training area near Townsend in 2014, which involved an undertaking to redevelop two spring sites (Abigale and Juniper springs) on federal land. An additional undertaking involved the redevelopment of Ancient Spring, located on state land. The DMA initiated consultation with the archaeologist for the Department of Natural Resources and Conservation (DNRC) to request cultural records regarding Ancient Spring, and to discuss whether or not there was a need for the spring to be resurveyed based on the age of previous studies. The DNRC did not request an additional survey (Rennie to Krigbaum, 2014).

A third Class III inventory was conducted in 2015 for the proposed construction of a new National Guard readiness center, located on land that is owned by Butte-Silver Bow County. The inventory for the readiness center included a pedestrian survey of a 50-acre parcel and resulted in the documentation of two sites. The sites include a water ditch believed to be associated with the Herman Ditch and Placer Mine District (24SB626), and a segment of a branch of the Road to Deer Lodge (24SB637). The eligibility of these expansive sites had been left undetermined in previous studies due to a lack of information regarding significance and overall site integrity. The district's 15 known features are widely dispersed over four Sections of land.

The fact that the eligibility of the previously documented resources had been left undetermined posed a problem in determining the effects of the armory construction, as the undertaking is expected to impact a small portion of one of the district's ditch features. For this reason, the secondary purpose of the study became to make a good faith effort to fully research the significance of the Herman Ditch District and determine the integrity of each feature and therefore, the overall site integrity. In addition to fully documenting the history and significance of the district, all of the previously recorded mining features were visited and re-recorded. Because the individual features and the overall site integrity was found to be very poor, and because the history of the site was not found to meet the significance criteria for listing in the National Register, the DMA's future actions within the APE is not expected to have an adverse effect on cultural resources. The DMA initiated consultation with SHPO, and SHPO concurred with the DMA's eligibility assessment and the finding of no adverse effect.

### Historic Building Documentation

Building T-330 at Fort Missoula is a Civilian Conservation Corps (CCC) motor pool shop constructed in 1940 and is a contributing element in the Fort Missoula Historic District. The building is located in a fenced National Guard security area and has been vacant for many years. Although building T-330 is in a historic district, documentation regarding the architecture and historic significance is minimal. Due to the general lack of building information, the DMA fully documented and photographed the building and assessed the building's eligibility as an independent resource. The building retains its integrity and remains a contributing element in the Fort Missoula district, but does not meet the criteria for eligibility as an independent resource.

### Montana Cadastral Mapping Website and Land Ownership Reporting Errors

The Board has requested that the DMA investigate and correct land ownership errors on the Montana Cadastral mapping project website in order to aid in proper reporting and the understanding of DMA land use and ownership. As an example, at the time of the Board's request the National Guard armory in Hamilton was shown to be on land owned by the Department of Transportation. The armory is actually on Montana State land, and this error has since been corrected (LaFontaine, 2015).

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The DMA is aware that the Cadastral has inaccuracies and works to correct errors as they are identified. The agency has been working to make corrections for the past several years, but has no control over when corrections are actually made to the site by the Department of Revenue. The DMA continues to work on correcting information on the Cadastral, as time allows.

## ***B. THE STATUS AND CONDITION OF HISTORIC RESOURCES WITHIN THE DISTRICT AT FORT HARRISON.***

### ***A Brief Description of the Fort Harrison Historic District***

As requested by the Board, the DMA would like to take this opportunity to report on the status and condition of the Fort Harrison Historic Cantonment District. This is an important resource that is managed by the DMA on behalf of the state's citizens.

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 buildings make up the historic district. Additionally, there are several historic buildings that are located in the cantonment area, 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 from the Department of Defense (DOD) to the Montana Army National Guard, through the U.S. Army Corps of Engineers. The buildings and structures within the cantonment, which include those that make up the historic district, remain federal property as well, but are managed by the DMA mainly through federal funds that are rolled into state coffers.

The buildings that make up the district and the larger cantonment area represent the principal training facility for the state's National Guard units as early as 1925, and make up 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. The period of significance established for the district is from 1926-1963. 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 semi-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.

### ***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 to not only ensure that future impacts do not occur, but to improve the management of the district. These actions include: initiating consultation with SHPO regarding any changes made to buildings within the district; completing the draft of a preservation plan and continuing to improve the plan; completing the district's interpretive project; and conducting visual impact studies for construction taking place outside of, but within view of the district.

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 association with the guard's principal training facility. However, the integrity of feeling and association has been compromised, in part due to the 1940s (and later) application of asbestos siding on many of the buildings, and/or asbestos covered additions being added to the wood frame and brick portions of

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buildings. The asbestos coverings are considered historic, as most were applied during World War II, but they are visually unappealing and detract from the historic look and feel of the buildings. Additionally, 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 each building is generally good, with many receiving regular maintenance and upgrades. A majority of the buildings are and have been continuously utilized, and are therefore well-managed and in good shape. Although the overall integrity of the district is satisfactory, two contributing elements (buildings) are considered “Endangered,” in that negative impacts have already occurred. The endangered status applies to two 1926 company kitchens, which were discussed in the last biennial report. These buildings have been condemned for many years and have therefore been devoid of federal funding for maintenance or upgrades. They have experienced a loss of structural integrity and are of particular concern to the DMA.

The company kitchens were constructed as temporary structures and are dilapidated. The buildings have badly damaged tiles, tiles that are completely missing, walls that are leaning outward and pulling the rooflines apart, interiors that are infested with nesting rodents and birds, and thin concrete slabs that are folding and sinking. The buildings are the last of at least 15 circa 1926 kitchens and mess halls that were removed sometime between 1976 and 1990. The kitchens were removed in part because new permanent dining facilities were constructed in the 1960s along with the first permanent barracks. Additionally, the 1926 kitchens were deteriorating, and because the cantonment has continued to grow, small non-insulated buildings are rarely able to serve any organizational purpose.

The remaining company kitchens are not independently eligible, but as early as 2003 were documented as potentially contributing elements in the historic district. The design integrity of the T-103 kitchen is good, but T-102 is not in its original state, as it is made up of three separate 1926 structures that have been interconnected using circa 1942 breezeways that are covered with asbestos shingles. The breezeways eliminated several original window and door openings in the older portions of the building.

Due to their rapid deterioration and the lack of the DMA’s ability to reuse the structures, buildings T-102 and T-103 have been slated for removal for a number of years. This past reporting session the DMA began preliminary discussions regarding the removal of the two kitchens based on health and safety concerns, as well as a definitively known future lack of funding for the buildings. Informal estimates for emergency (temporary) stabilization for the structures have come in at several hundred thousand dollars, but rehabilitating them for long term preservation will be much more expensive and logistically difficult. According to interdepartmental meetings, which have included representatives from the offices of Facilities Management, Plans and Programs and Environmental, any renovation will require the buildings to be completely taken apart and put back together on a solid foundation, as the logistics of stabilization during construction does not appear to be a safe or fiscally responsible approach. Perhaps of equal importance is that many of the clay tiles are severely damaged or missing, and because they are a locally made pattern that is no longer produced, cannot be replaced.

During the most recent interagency meeting regarding the company kitchens (October 2015), the DMA agreed that they would look into the possibility of trying to find ways to preserve one of the buildings by utilizing the tile materials from the other structure, and in an effort to do so, began looking into various grant options and means to fund a structural assessment. They have since contracted a structural engineer to perform the assessment, which will be conducted this spring. The agency also initiated an informal SHPO consultation requesting grant information and looked into the Department of Defense’s Legacy

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Resource Management grant, which is meant to conserve the department's natural and cultural heritage. Unfortunately, the DMA was recently informed that the proposed rehabilitation does not fall under Legacy guidelines, as the funding needs to directly benefit a military mission objective (i.e. testing, training, operational). To date, no preservation funding has been found, but the DMA continues to look for the means to finance the project. If funding can be attained, the proposed undertaking would achieve the following:

- Preserve the heritage of the Montana National Guard by saving a representative example of the earliest semi-permanent construction at the cantonment.
- Address safety concerns due to the buildings being in a dilapidated state for such a long period of time.
- Aid the National Guard in properly managing historic properties at the cantonment.
- Mitigate for the loss of one resource by utilizing the clay materials to not only re-build the other structure, but to benefit proposed preservation projects at the cantonment and in Broadwater County. These projects include:
  1. The use of excess clay tiles (assuming there will be some) to aid the Montana Military Museum in creating an interpretive space for historic military vehicles at the cantonment.
  2. The donation of additional clay tiles to the Save Our Silos movement, taking place in Townsend, Montana. The Broadwater County Development Corps is working to save the crumbling silos and are in need of the same type of hollow clay tiles.

Because the company kitchens are endangered, the DMA has recently had the kitchens photographed and the history of the buildings is currently being researched and documented. The DMA has moved forward by obtaining funds to complete a structural assessment, which will help the agency understand the magnitude of the repair costs and what will all be associated with the undertaking. The DMA will begin a formal consultation with SHPO when additional information has been gathered.

Other identification and documentation efforts during this reporting session have included consulting with SHPO to determine the best design for proposed upgrades made to building T-19. The T-19 building is currently utilized by the Montana Military Museum and is a contributing element in the district. The building was constructed in 1933 and served as a dispensary in its early years, but was vandalized after World War II and was slated for demolition in the early 1960s. The Museum's use of T-19 for general storage over the years helped save the building from demolition. The brick portion of the building has had windows and doors boarded over for years. Recently the museum proposed leaving in place the plywood window coverings and remodeling the interior to enhance the function of the building. New windows were not desired, as the museum wished to continue the abandoned window function in order to create a proper interior artifact storage and exhibit workspace. The DMA and SHPO agreed that to enhance the interior function of the building the window function should remain abandoned. However, SHPO viewed the existing semi-permanent boarding of windows as adverse to the National Register qualities of the property. The DMA therefore proposed keeping the windows covered by installing replicas of the historic shutters that once covered the windows, and SHPO concurred. The historic shutter replicas and the interior remodeling have been completed for T-19.

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

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

Coordination and staffing procedures are critical for cultural resource stewardship and compliance. During this reporting cycle, the DMA has actively pursued proper management of cultural resources and in doing so, has initiated interdepartmental meetings to discuss actions that trigger compliance. Additionally, a contracted cultural resource manager aids the DMA in determining which projects require compliance and offers methodologies for completing cultural studies. The interdepartmental discussions between staff and consultants have been successful in that the departments remain well-informed regarding cultural resource laws and regulations, and cultural resources are properly managed.

### ***Stewardship Efforts***

In the past two years the DMA has improved their overall management of cultural resources at Fort Harrison and all lands utilized by the DMA. The agency has initiated studies that document resources within training areas, fully documented all historic buildings managed by the agency, consulted with SHPO in regard to several building upgrades and conducted visual impact assessments for new construction within view of the cantonment district. The historic district at Fort Harrison as well as historic structures that lie outside of the district have received much care and attention this reporting session in that some upgrades to historic buildings have occurred, while the adaptive reuse of two vacant historic buildings outside of the district are currently being discussed.

The DMA realizes the benefits of interagency partnership efforts regarding cultural resources, and in addition to working directly with SHPO, has worked with the following agencies during this reporting period:

- The Bureau of Land Management (BLM) in regard to environmental and cultural concerns on BLM leased training land in the Helena area.
- The BLM in regard to cultural permitting for conducting cultural resource investigations in the Abigale and Juniper spring areas near Townsend.
- The Department of Natural Resources and Conservation in regard to previous studies conducted in the Ancient spring area near Townsend.
- Helping the BLM locate previous cultural studies in order for the agency to complete an environmental assessment for a DMA lease renewal in the Helena area.

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

No costs were incurred this past biennium from the stewardship of heritage properties located on state land, but the DMA invested money in determining whether or not several Cold War era buildings that are located on state land are National Register eligible properties. The agency has also invested in the research, development and protection of resources located at Fort Harrison and Fort Missoula.

The investments at Fort Harrison have the potential to increase the value of both the land and the buildings within the cantonment. The interpretive media installed in the district will likely result in a beneficial effect by bringing to life the history of the area, and offering visitors and those who work and

train at Fort Harrison a deeper appreciation for the history of the state's Guard and the elements that make up the district. The investments may also generate repeat visitation, which can increase tourism.

Nearly all of the costs for the stewardship of cultural resources at the Fort Harrison cantonment have been for conducting visual impact assessments and building eligibility determinations, upgrading historic buildings and completing the final phase of the district's interpretive project. The total cost of stewardship for these undertakings came to approximately \$390,000.00. A majority of this total was utilized for building rehabilitation and preservation/protection consultation, which are seen as investments that increase the value of tangible assets. The preservation plan (which was of no cost to the DMA this reporting session) and the visual impact assessments help ensure the long term integrity of the historic buildings, and will therefore create 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 \$364,000.00.

The Fort Missoula buildings that the DMA invested in this past biennium do not potentially benefit the public in the same way that the resources at Fort Harrison do. They are in a restricted fenced compound, have no interpretive signage, are along the far western edge of the fort and are largely ignored as being part of the fort's historic district. The costs of stewardship for these buildings came to approximately \$7,200.00, which includes the historic documentation of two buildings (building numbers T-330 and 351) and efforts to reduce trespassing and the vandalization of historic buildings.

The table below is an itemization of the DMA's stewardship efforts for the Montana Army National Guard Cantonment Historic District and other DMA managed lands.

*Table 2. Stewardship efforts/investments during 2014 and 2015.*

<b>Type of stewardship efforts/investment</b>	<b>Cost</b>
Heritage property administration/operations (only for buildings located within the Fort Harrison historic district).	\$15,500.00
Heritage restoration/rehabilitation/repair project activity for buildings within the Fort Harrison historic district (T-19 and Service Club)	\$335,000.00
Heritage preservation/protection project activity & consultation (\$29,566.00 for consultation & \$4,550.00 for repair and reseed at Fort Missoula).	\$34,116.00
Heritage interpretation/education/awareness project activity (finishing interpretive panels, brochures at Fort Harrison).	\$4,920.00
<b>Total stewardship cost</b>	<b>\$389,536.00</b>

### ***Consultation and Cultural Resource Identification Efforts***

The DMA has consulted with SHPO a total of seven times in regard to cultural resources this past biennium. All of the visual impact studies, archaeological surveys, and determinations that were reviewed by SHPO in the past two years have received concurrence. The consultations included a wide range of cultural studies, but there were no undertakings that fell under the State Antiquities Act. Although the Glasgow armory and buildings located at the Fort Harrison Annex are located on state land and were assessed for their eligibility, they are federally funded (as were the undertakings), and therefore fell under Section 106 regulations.

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>
Spring redevelopment surveys at the Limestone Hills Training Area for the Juniper and Abigale spring areas.	2014	Section 106 Class III investigations and a finding of no adverse effect.	Concurrence letter from SHPO. Reports filed with the BLM Butte Field Office and the Montana Antiquities Database.
Fort Harrison Cantonment Historic District- Interpretive project phase II	2014	Continued construction of the interpretive signage, printing brochures and installing the remaining 11 of 16 interpretive panels.	N/A-no consultation.
Fort Missoula Building T-330 (CCC building and a contributing element in district).	2014	Creation of a Montana Historic Property Record and full photographic documentation. Assessed for its eligibility as an independent element.	N/A-no consultation. Filed Historic Property Record with the Montana Antiquities Database.
Flammable Materials storage building at Fort Missoula.	2014	Creation of a Montana Historic Property Record and full photographic documentation for a Cold War era building. Assessed for its eligibility as an independent element.	N/A-no consultation. Filed Historic Property Record with the Montana Antiquities Database.
Sale of the Miles City National Guard Armory/Readiness Center.	2014	Follow-up Section 106 study regarding the sale/transfer of the Miles City armory.	Concurrence letter from SHPO.
T-19 in Fort Harrison Cantonment District.	2014	Renovation of a historic building that is a contributing element within the district.	Concurrence letter from SHPO.
Building 517 at Fort Harrison cantonment.	2014	Documentation, eligibility assessment and a visual impact assessment of the proposed upgrades to a Cold War era building within view of the cantonment's historic district.	Concurrence letter from SHPO. Filed Historic Property Record with the Montana Antiquities Database.
Proposed construction of a readiness center near Butte	2015	Class III investigations, with an additional study to determine the significance and integrity of a previously documented placer mining district.	Concurrence letter from SHPO. Filed report with the Montana Antiquities Database.

Glasgow Armory and associated storage buildings.	2015	Documentation and eligibility assessment of two Cold War era buildings.	Concurrence letter from SHPO. Filed Historic Property Record with the Montana Antiquities Database.
Helena Field Maintenance Shop #3 complex located at the Fort Harrison Annex.	2015	Documentation and eligibility assessment of three Cold War era buildings.	Concurrence letter from SHPO. Filed Historic Property Record with the Montana Antiquities Database.

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

Maintaining and improving the status of cultural resources is a priority, but obtaining adequate financial support for historic buildings that do not serve an organizational purpose remains a challenge for the agency. The DMA understands that neglect caused by a lack of adequate financial support erodes the physical and historical attributes of heritage properties, and continues to seek means to properly maintain historic buildings located at Fort Harrison and Fort Missoula. The DMA takes an active approach in that it focuses on routine maintenance and upgrades whenever possible, and is currently discussing ways to better utilize historic buildings.

Direct impacts to historic buildings have not occurred in the past two years, but there are measures needed to address indirect impacts to buildings within the Fort Harrison and Fort Missoula historic districts. For instance, indirect impacts can be caused by a lack of funds for repair. As fully outlined in the last report, funds for regular maintenance and upgrades are controlled by a federal agency that rolls money into the state coffer, and to some extent, money is allocated based on the buildings existing integrity and its organizational purpose.

Resources at Fort Harrison that are in need of repair or upgrades at this time include: the condemned 1926 T-102 and T-103 company kitchens/mess halls (in the historic district) and the condemned WWII era Theatre (out of the district). Additionally, the four buildings that serve as the National Guard Thrift Shop complex (in the district) that were discussed in the last report continue to have several windows that are boarded over. Although several new windows have been installed, the windows that were boarded over several decades ago when the buildings were vacant, continue to remain boarded. The existing condition is preferred by the Thrift Shop because the abandoned window function creates wall space for display and storage. The DMA is aware that boarded windows are adverse to the building's National Register qualities, but is not taking any action at this time. The Thrift Shop complex is managed on a daily basis by the non-profit National Guard Thrift Shop, who began leasing the buildings in the 1970s. However, it is the DMA's intention to continue working with the non-profit to gradually upgrade the Thrift Shop building complex, as needed.

The DMA is a steward of several heritage properties at Fort Missoula, and like Fort Harrison, the resources are owned by the Department of Defense. A majority of the DOD buildings at Fort Missoula are either associated with the Civilian Conservation Corps (circa 1940) or with the Montana National Guard and the Cold War era (circa 1960). For the most part, the CCC buildings are well maintained, and a majority of them are utilized for interpretive purposes, one of which is occupied by the Military Museum. However, two CCC motor pool buildings (T-328 and T-330) that have been vacant for many years have

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received less attention in regard to regular maintenance. Both of the motor pool buildings were constructed in 1940 and are contributing elements in the Fort Missoula Historic District. These buildings are located within a fenced security area and are therefore not used by the Fort for interpretive purposes. The buildings serve no organizational purpose for the DMA and have therefore received little to no funding for maintenance and/or repairs. Building T-330 remains in relatively good condition, but the windows and west face of building T-328 has been vandalized many times over the years. It is located at the far western edge of the Fort and is adjacent to river access trails and roads.

The DMA has had some liability concerns with motorized vehicles accessing the DOD lands located at the far west end of the Fort and adjacent to building T-328, and recently decided to fence the property. The fencing was also to act as a natural buffer to the DOD buildings, and a promising way to prevent the continued vandalization of T-328. The DMA constructed a jackleg fence, resloped the land, obliterated trails and two-track roads that led to the Clark Fork River and seeded the property. Unfortunately, some of the fencing was vandalized and removed almost immediately, and vehicle and pedestrian travel resumed along the lands adjacent to building T-328. The agency recently hired an environmental consulting firm to repair the damaged fence and reseed portions of the property. The DMA will continue to monitor the area and address fence repairs as needed.

A regional park that is currently being constructed at Fort Missoula is benefitting the DMA's management of the fort's historic buildings. Construction will take place for the next several years, and has temporarily cut off public access to the DOD lands. Ultimately, the park's main parking lot will be located directly to the north of the DOD lands and will likely help prevent trespassing and vandalism, as the once seemingly remote buildings will soon be under the attention and scrutiny of the public.

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

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

The purpose of the DMA cultural resource 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 Impact Specialist, who also serves as the Cultural Resource Manager (CRM). The Environmental Office and the Construction and Facilities Management Office staff work with consultants who aid the DMA in meeting their cultural resource responsibilities.

To support the goals of the cultural resource 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 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 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 managed lands, the status of inventory and evaluation of resources at each site and training installation, and appropriate compliance and management activities for the established period.

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Compliance actions are completed by the DMA prior to any ground disturbance activities or construction project. 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 resource 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 and to implement protection and compliance actions.

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 lands that have triggered the Montana State Antiquities Act. Therefore, no consultations occurred with SHPO pursuant to MCA 22-3-424 (1) and (2).

### ***Training Opportunities***

Training for the DMA staff is a prerequisite for good stewardship of cultural resources, and training opportunities are available for environmental staff as well as non-environmental staff. 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 documentation and tribal consultation. Cultural resource management training courses usually range from 3 to 5 days.

In the past, the National Guard Bureau hosted three conferences every year, which included: the National Environmental Workshop, the Conservation Workshop, and the Compliance Workshop. The Guard Bureau has now consolidated the workshops into one training session called the Environmental Program Managers Workshop.

For the CRM, training recommendations include:

- Primary Training – Section 106, American Indian consultation workshop, National Guard Bureau (NGB) cultural resource classes (offered annually), 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.

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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.
- 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 interacting with field commanders, project planners, facility managers, and the Adjutant General staff, the CRM can develop solutions that blend with existing training opportunities and the MTARNG mission.

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

The DMA has been successful in meeting their compliance responsibilities in regard to identification and evaluation, but continues to face a funding challenge in protecting heritage properties. Although the DMA is capable of implementing the ICRMP, there is no guarantee that funds will be available from the National Guard Bureau. An additional potentially complicating factor is that a majority of the lands used by the agency 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 typically initiates and takes the lead in identifying, documenting and evaluating cultural resources, regardless of surface ownership. The DMA treats the leased land as its own, and has been successful in meeting their cultural inventory responsibilities. The focus of the DMA during this reporting period has been to seek concurrence from SHPO on all undertakings that are triggered by state or federal compliance regulations, to seek a formal finding of effect for projects conducted in existing or proposed training areas, and to improve the historic district at Fort Harrison.

With more than 3,000 personnel working throughout the Montana Army National Guard and the DMA in both military and civilian jobs, integration and coordination among offices can be very challenging. To effectively manage a cultural resources program, coordination is absolutely essential. The CRM makes sure that 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 cultural resource management professionals continue to 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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e2M

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## APPENDIX

### *Illustrations & Photographs*

## A Home for the Guard



The Weasel, an over-the-snow supply vehicle, was used by the Army at Fort Harrison in 1943.

In 1925, Fort William Henry Harrison became the official cantonment and annual summer training facility for the Montana National Guard (163rd Infantry Regiment).

The following year, the Guard began to design and make permanent improvements to the cantonment. This marked the first of three historical periods of expansion and change for the facility, including:

- Initial Construction Period (1926-1939)
- Federalization Period (1942-1943)
- Post War Period (1948-1963)

The cantonment's layout changed very little during these periods. However, the number, construction and style of individual buildings varied greatly as the Guard strived to create a post fit to accommodate the military's needs—as well as the changing times.

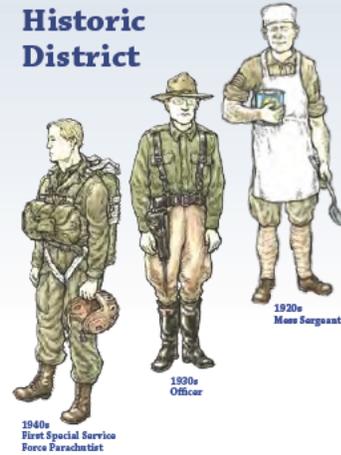
The Historic District comprises nearly 16 acres within the core of the cantonment. The buildings here occupy their original locations and possess the integrity of materials, workmanship and design for each period.



Montana Army National Guard  
Fort William Henry Harrison  
Helena, Montana  
(406) 324-3000

## Historic District Walking Tour

### Welcome to the Montana Army National Guard Historic District

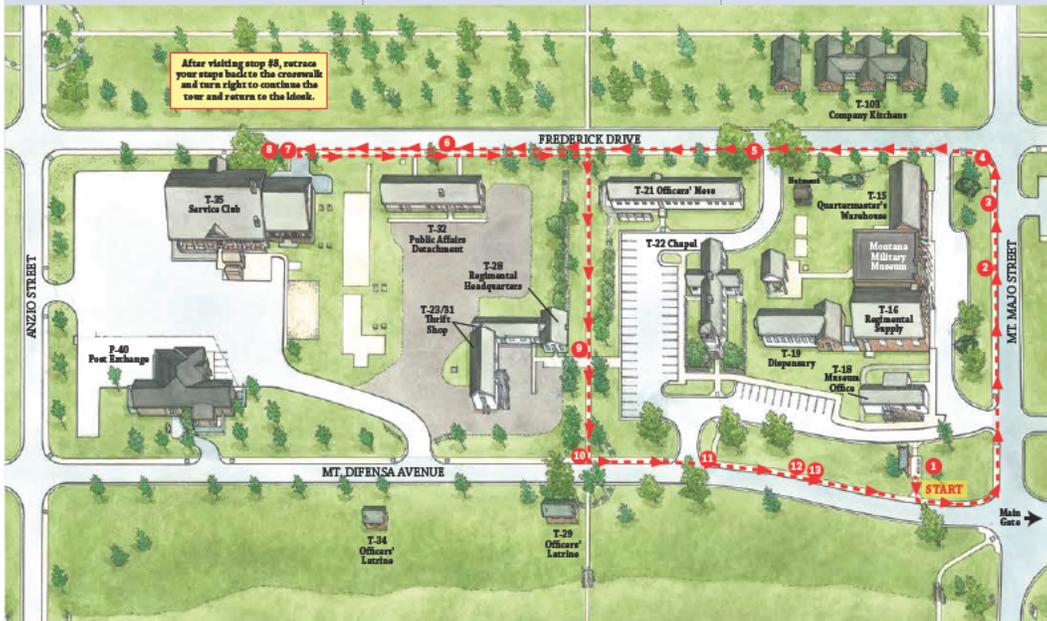


Explore Fort Harrison's role in shaping Montana's military history.

## Historic District Walking Tour

Starting at the kiosk located south of the Montana Military Museum, explore the oldest part of the Montana Army National Guard's cantonment at Fort Harrison.

- 1 START HERE Welcome to the Montana Army National Guard Cantonment's Historic District
- 2 The Guard: Past to Present
  - The Montana Militia
  - The Guard Finds a Home
  - The 163rd Evolves
  - Montana's Soldiers Abroad
  - Always Ready, Always There
- 3 Establishing a Permanent Infrastructure
- 4 The Dividing Line
- 5 Winterization and Expansion
- 6 Rehabilitating for Year-Round Occupation
- 7 From Rebels to Recreation
- 8 A Force Like No Other
- 9 A Regimental Affair
- 10 The Officer's Life
- 11 A Place for Prayer
- 12 Healing the Sick and Wounded
- 13 A New Guard, A New Direction



Fort Harrison Historic Cantonment District brochure.



Looking south at circa 1920s, 1930s and 1940s buildings located in the Fort Harrison Cantonment District.



WWII era building located in Fort Harrison's historic district.



Contemporary buildings and landscape along northern edge of historic district (T-103 at right).



Circa 1926 kitchen/mess hall (T-103) facing north.



Circa 1926 kitchen/mess hall (T-103) facing south.



Circa 1940 photograph of the row of 1926 kitchens/mess halls looking northwest (T-102 and T-103 are in forefront).



Example of Cold War era buildings located on state land that were assessed for their eligibility.