

THE MONTANA DEPARTMENT OF MILITARY AFFAIRS BIENNIAL REPORT ON HERITAGE PROPERTIES

SUBMITTED TO THE MONTANA PRESERVATION REVIEW BOARD FOR THE 2020
REPORTING YEAR

SUBMITTED BY:

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



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Cover photo: Fort Harrison encampment (c. 1943)

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A. HERITAGE PROPERTIES MANAGED BY THE DEPARTMENT OF MILITARY AFFAIRS

Executive Summary

The Montana Department of Military Affairs (DMA) presents its fifth biennial report to the Montana Preservation Review Board (Board) as required by Montana Senate Bill 3 (SB3): an act requiring state agencies and the Montana University System to biennially report on the status and maintenance needs of agency heritage properties. The DMA has continued to improve its inventory and management of cultural resources by 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 completed Historic Property Records for historic buildings; has reviewed all data on file with the State Historic Preservation Office (SHPO) in regard to heritage properties located within the boundaries of Fort William Henry Harrison (Fort Harrison); has consulted with the State Historic Preservation Office (SHPO) on various undertakings; and is currently updating the Integrated Cultural Resource Management Plan (ICRMP) for Installations of the Montana Army National Guard (MTARNG). Additionally, the agency continues to execute contractual agreements with cultural resource specialists that aid the DMA and MTARNG in meeting their cultural resource responsibilities, and help coordinate consultation between the DMA and SHPO.

The DMA has not managed any heritage properties on state owned land during previous reporting sessions, and typically reports only on the 16 resources that make up a historic district located on federal land at Fort Harrison. However, the DMA has recently purchased 1,853 acres of private land west of Fort Harrison that had been previously utilized for National Guard training purposes. The newly acquired land was once owned by Burnham/Prickly Pear (Burnham) and RV Ranch (RV). The Fort Harrison state lands were acquired with DMA state funds. Based on preliminary research, the Fort Harrison state lands contain 13 sites that are either eligible for listing in the National Register of Historic Places (NRHP) or have an undetermined eligibility status. A majority of the sites require further assessment in order to resolve their eligibility standing; hence the DMA has added 13 potential heritage properties to its stewardship list for this reporting session.

The Number and Type of Heritage Properties Managed by the DMA

The DMA oversees the operations of the MTARNG assets, managing approximately 28,000 acres and over two hundred and forty-four buildings at 23 locations statewide. The majority of the DMA managed inventory consists of two major training areas (Fort Harrison and Limestone Hills); three local training areas (private or state leases); 14 Readiness Centers (RCs); five Armed Forces Reserve Centers (AFRCs); and eight Maintenance Shops.

DMA and MTARNG land ownership is a mixture of federal and state land, but nearly all of the MTARNG buildings are federally owned or supported with federal funds. RCs, AFRCs and Maintenance Shops are generally located on state land, but DMA has determined that there are no heritage properties at these locations. Any private or state leased land will not be reported as a DMA heritage property because the Board has requested that leased parcels be reported on by the managing state agency. Fort Harrison and Limestone Hills training areas mostly consist of federal land that is owned by the Department of Defense (DOD) and leased to the MTARNG by the Army Corps of Engineers; or on land that is utilized under a Memorandum of Understanding with other federal agencies. All of MTARNG's heritage properties that are reported on under SB3 are located within the cantonment and training area at Fort Harrison, in Lewis and Clark County.

Given the nature of the agency’s management of significant resources on federal land and the lack of heritage properties on state-owned land, the SHPO and the Board has clarified the DMA’s reporting status, and has determined the most appropriate method for the agency to report on heritage properties under SB3 is to report on the following:

- The status of the DMA’s identification efforts regarding state-owned properties and the continued verification that no state-owned heritage properties have been overlooked.
- The status of the MTARNG Cantonment District (24LC1949) located at Fort Harrison (the land and buildings are federally owned).
- 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, a large portion of this report will discuss the status of heritage properties that are located on federally owned lands located within the Fort Harrison cantonment.

The DMA has identified a total of 30 heritage properties that meet the SB3 reporting criteria, which include: 17 historic buildings that are located on federal land within Fort Harrison’s cantonment; and two eligible and 11 potentially eligible, “unresolved” archaeological sites that are located on the newly acquired state land at Fort Harrison. Sixteen of the 17 heritage properties located within the cantonment area make up the MTARNG Cantonment District (24LC1949), and one of the properties is an independently eligible building located within the cantonment, but outside of the district boundary. A majority of the 13 archaeological sites located on state land are associated with historic, small-scale prospecting and mining. The following two tables summarize the 30 heritage properties:

Table A-1. *Heritage properties located within the MTARNG cantonment at Fort Harrison.*

	Building number	Type of building/structure (all are associated with the history of the MT Army National Guard)	Year built	In/out of Historic Cantonment District (24LC1949)
1.	T-15	Quartermaster’s Warehouse	1934	In-contributing resource
2.	T-16	Regimental Supply	1928	In-contributing resource
3.	T-18	Museum Visitor’s Center (moved from VA)	c.1942	In-contributing resource
4.	T-19	Dispensary	1933	In-contributing resource
5.	T-21	WWII Officer’s Mess	1942	In-contributing resource
6.	T-28	Regimental Headquarters	1928	In-contributing resource
7.	T-29	Officer’s Latrine	1928	In-contributing resource
8.	T-31 and T-23	Thrift Shop (adjoined buildings)	1942	In-contributing resource
9.	P-32	Public Affairs Office	c. 1962	In-contributing resource
10.	T-34	Officer’s Latrine	1935-37	In-contributing resource
11.	T-35	Service Club	1939	In-contributing resource-
12.	T-102	Company Kitchen	1926	In-contributing resource
13.	T-103	Company Kitchen	1926	In-contributing resource
14.	P-120	Armory	1962	In-contributing resource
15.	P-220	Administration	1962	In-contributing resource
16.	P-230	Administration	1962	In-contributing resource
17.	T-77	Theater	1942	Out-independently eligible

Table A-2. *Heritage properties located within the newly acquired state land parcels at Fort Harrison.*

	Site #	Type	General Location (Township, Range, Section)
18.	24LC1258	Historic travel corridor-Helena to Deer Lodge Stage Road	T10N, R5W, S12; T10N, R4W, S7 (Burnham)
19.	24LC1280	Stemwinder Lode	T10N, R4W, S17 (Burnham & RV)
20.	24LC2061	Historic mining	T10N, R4W, S16 (RV)
21.	24LC2062	Historic placer mine-Truant Lode	T10N, R5W, S12 (Burnham & RV)
22.	24LC1112	Austin Historic Mining District (proposed district)	Various Range and Section numbers (Burnham & RV)
23.	24LC2113	Historic mining and small-scale prospecting	T10N, R4W, S7 (Burnham)
24.	24LC2114	Historic mining and small-scale prospecting	T10N, R5W, S12 (Burnham)
25.	24LC2115	Historic debris scatter-mostly brick, some bottle and cans	T10N, R4W, S7 (Burnham)
26.	24LC2116	Historic mining-pits, collapsed structure	T10N, R4W, S7 (Burnham)
27.	24LC2117	Historic debris scatter-pits, collapsed structure	T10N, R4W, S7 (Burnham)
28.	24LC2118	Historic debris scatter-collapsed building and associated artifacts	T10N, R4W, S18 (Burnham)
29.	24LC2119	Lithics-small scatter of lithic debitage	T10N, R4W, S12 (Burnham)
30.	24LC2120	Historic mining-waste rock, prospect pits	T10N, R4W, S18 (Burnham)

B. THE STATUS AND CONDITION OF HISTORIC RESOURCES WITHIN THE CANTONMENT AND STATE LAND PARCELS AT FORT HARRISON.

The Status and Condition of the Montana Army National Guard Cantonment District (24LC1949)

A majority of the cantonment at Fort Harrison is made up of modern training and administrative buildings, but a centrally located area within the cantonment is home to some of the earliest permanent military structures, which make up the MTARNG Cantonment District (24LC1949). The cantonment is utilized by civilian and non-civilian workers and is located on federal property that is licensed from the Department of Defense to the MTARNG, through the U.S. Army Corps of Engineers. The buildings and structures throughout the cantonment are federal property, but are managed by the DMA.

The buildings in the historic district and the larger cantonment area represent the state’s principal training facility for the National Guard as early as 1926, and make up Montana’s original and only permanent MTARNG training facility. The MTARNG Cantonment District (24LC1949) 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, and the period of significance established for the district is from 1926-1963. The district is made up of 16 contributing elements and five noncontributing elements, on approximately 16 acres. It contains semi-permanent buildings constructed during the initial development program (1926-1939), as well as several temporary 1942-1943 World War II buildings, and permanent circa 1962 buildings that were constructed during the Cold War era. None of the 16 buildings are individually eligible, but as a coherent whole, the buildings make up a district that is eligible at the state level (National Park Service, Keeper of the NRHP, 2011).

Although the overall integrity of the historic district at Fort Harrison is satisfactory, two buildings (T-102 and T-103) are endangered, in that negative impacts (deterioration) have already occurred, and the removal of the two buildings is impending. The DMA has drafted a Memorandum of Agreement (MOA) to be entered into between the National Guard Bureau (NGB), the MTARNG and the SHPO for the removal of T-102 and T-103. The MOA will determine the type and level of compensatory mitigation necessary to demonstrate compliance. The MOA is currently being reviewed by the NGB, and will be sent to SHPO for review during the next reporting session. Additionally, another building located within the cantonment, but located outside of the historic district, has a “threatened” status. The World War II era Theater (T-77) has not served a need or organizational purpose for many years and is potentially endangered. The DMA and MTARNG will continue to investigate options, and report on any changes to T-77 in the next biennium report.

Table B-1. *Status and condition of heritage properties located within the Fort Harrison cantonment.*

	Building number	Type of building/structure	NRHP Eligibility Status	Status	Condition
1.	T-15	Quartermaster’s Warehouse-1934	Contributing element	Satisfactory	Excellent
2.	T-16	Regimental Supply-1928	Contributing element	Satisfactory	Excellent
3.	T-18	Museum Visitor’s Center-1942 (moved)	Contributing element	Satisfactory	Good
4.	T-19	Dispensary-1933 & 1942	Contributing element	Improving	Good
5.	T-21	WWII Officer’s Mess-1942	Contributing element	Watch	Poor
6.	T-28	Regimental Headquarters-1928	Contributing element	Watch	Good
7.	T-29	Officer’s Latrine-1928	Contributing element	Satisfactory	Good
8.	T-31 and T-23	Thrift Shop – 1942 (adjoined buildings)	Contributing element	Satisfactory	Fair
9.	P-32	Public Affairs Office-1962?	Contributing element	Satisfactory	Good
10.	T-34	Officer’s Latrine 1935-1937	Contributing element	Satisfactory	Good
11.	T-35	Service Club-1939	Contributing element	Satisfactory	Excellent
12.	T-102	Company Kitchen-1926	Contributing element	Endangered	Failed
13.	T-103	Company Kitchen-1926	Contributing element	Endangered	Failed
14.	P-120	Armory/Admin -1962	Contributing element	Satisfactory	Excellent
15.	P-220	Administration-1962	Contributing element	Satisfactory	Excellent
16.	P-230	Administration-1962	Contributing element	Satisfactory	Excellent
17.	T-77 Theater	WWII Theater-outside of district boundary	Independently eligible	Threatened	Poor

The Status and Condition of Heritage Properties within the State Land Parcels

The 1,853 acres that make up the Fort Harrison state land parcels were fully inventoried for heritage properties by the DMA when they were under a lease. There are 13 sites that have been identified within the parcels, with two sites recommended as “potentially eligible,” and 11 sites recommended as “ineligible” for listing in the NRHP. However, the cultural studies that made the site recommendations were not conducted in conjunction with a specific undertaking, and consequently, SHPO was unable to concur with the recommended determinations of eligibility (Warhank, 2008, Murdo, 2019). SHPO currently lists the status of two sites as “eligible” and 11 sites as “unresolved,” and therefore the DMA will treat all 13 sites as heritage properties until their eligibility is resolved.

Nearly all of the sites located within the newly acquired state land are associated with historic prospect mining. The sites are most commonly made up of prospect pits, shafts, adits and associated piles of waste rock, with some sites including the remains of building foundations and historic debris. In addition to the mining sites, one site is associated with prehistoric stone tool production and another is a historic travel corridor. For the most part, the sites lack overall integrity.

Additionally, a majority of the historic mining sites are not well-developed and historic documentation of the sites could not be located by the research consultants. They appear to represent short-lived, small-scale mining and prospecting activity, and have experienced a loss of integrity due to age, natural erosion, grazing, looting, and recreational and training activities.

A majority of the sites located within the Fort Harrison state land parcels have an “endangered” status, which means that serious negative impacts to the historic integrity of the sites have already occurred, and are continuing to occur. The ineligible recommendations for these sites are supported by a lack of integrity as well as the site’s lack of association with historic events or people (Criteria A, B). Additionally, the site’s lack any features that have a unique architectural or engineering style (Criteria C); and are not likely yield further information important to the greater understanding of the history of the area (Criteria D). Three mining sites are on “watch” status, although they too have relatively poor overall integrity and have been recommended as ineligible.

Table B-2. *Status and condition of heritage properties located on state land.*

Site #	Description and NRHP Eligibility Recommendation	SHPO NRHP Eligibility Status	Status	Condition
18.	24LC1258 Historic road and travel corridor-Helena to Deer Lodge Stage Road. Historically had only brief use; alignment is altered; existing two-track fragments are in a high use area and are in poor condition. Recommended as not eligible (Rennie, 1995 and HRA, 2007).	Unresolved	Endangered	Failed
19.	24LC1280 Historic mining-Stemwinder Lode. Site is made up of cement and earthen building foundations, shafts, adits, prospect pits and cairns. Has poor integrity due to impacts from heavy machinery and modern mining activities, and the installation of modern safety features (i.e. culverts, vents, grates, fencing). Recommended as not eligible (GCM, 1996 and HRA, 2007).	Unresolved	Endangered	Failed
20.	24LC2061 Historic, small-scale mining and prospecting. Site is made up of earthen dam, ditch, cuts and a prospect pit. Integrity has been compromised. Site is not well-developed and historic documentation of the site could not be located. Recommended as not eligible (HRA, 2007).	Unresolved	Watch	Fair
21.	24LC2062 Truant Lode placer mine. Made up of adit, shaft, rock wall, pits, cairn and waste rock. Located within the Austin Mining District (24LC1112). Mine is not well-developed and only minimal historic documentation of the site could be located. Recommended as not eligible (HRA, 2007), but recommended as a potential contributing element in the Austin Mining District (24LC1112).	Eligible (potential contributing element)	Watch	Fair
22.	24LC1112 Historic Austin Mining District (24LC1112). This district could include buildings, structures and features associated with the area’s placer/lode mining era (1880s-1930s). However, the site documentation does not offer a physical description of the district and does not specify any buildings or features. It only maps a proposed district boundary, a majority of which is located outside of DMA managed lands.	Eligible	Unknown	Unknown

		The district is currently recommended as being eligible for listing in the NRHP, but the original documentation (Park, 1993) recommends a more intensive evaluation of site integrity and significance in order to make a formal determination of eligibility.			
23.	24LC2113	Historic small-scale mining and prospecting site made up of an adit, pit and small mound of waste rock. Site is not well-developed and historic documentation of the site could not be located. It has been impacted by grazing, erosion, recreational use and military training. Recommended as not eligible (HRA, 2007).	Unresolved	Watch	Fair
24.	24LC2114	Historic small-scale mining and prospecting site made up of prospect pits, trenches and waste rock. Site is located within the Austin Mining District (24LC1112). Site has been impacted by grazing, erosion, recreational use and military training. Recommended as not eligible (HRA, 2007) individually, nor as a contributing element within the Austin Mining District (24LC1112).	Unresolved	Endangered	Poor
25.	24LC2115	Historic debris and homestead. Site is made up mostly of architectural materials (brick, fencing, lumber), with some bottle and can debris. Site has been impacted by grazing, erosion and looting. Recommended as not eligible (HRA, 2007).	Unresolved	Endangered	Failed
26.	24LC2116	Historic mining and prospecting site made up of prospect pits, trenches, one collapsed structure and footings of a structure (possibly a stamp mill). Historic documentation of the site could not be located. Site lacks integrity due to erosion, recreational and military training activities. Recommended as not eligible (HRA, 2007).	Unresolved	Endangered	Fair
27.	24LC2117	Historic debris scatter and mining site made up of brick fragments, prospect pits and a collapsed structure. Site lacks integrity due to erosion, grazing, recreational and military training activities. Additionally, the site has suffered from artifact collection. Recommended as not eligible (HRA, 2007).	Unresolved	Endangered	Failed
28.	24LC2118	Collapsed frame building that may have measured 10' x 10', and associated artifacts. Integrity is poor due to erosion, recreational activities and artifact collection. Recommended as not eligible (HRA, 2007).	Unresolved	Endangered	Failed
29.	24LC2119	Small scatter of lithic debitage on small knob of bedrock. Site is made up of approximately 15+ yellow chert, tertiary flakes. Shovel testing resulted in negative findings. Recommended as not eligible (HRA, 2007).	Unresolved	Satisfactory	Fair
30.	24LC2120	Historic small-scale mining and prospecting site made up of prospect pits, a shaft and waste rock. Site has been impacted by grazing, erosion, recreational and military training activities and modifications, which include grading with heavy machinery. Recommended as not eligible (HRA, 2007).	Unresolved	Endangered	Failed

C. STEWARDSHIP EFFORTS AND COSTS

Consultation and Cultural Resource Identification Efforts

This past biennium, the DMA has invested money in the research, development and protection of heritage resources located within the cantonment area, and the newly acquired state lands within Fort Harrison’s MTARNG training area. Although negative impacts to two buildings within the MTARNG Cantonment District (24LC1949) are impending, actions have also been underway to not only ensure that future impacts do not occur, but to improve the overall management of the district. These actions include: the continued in-depth documentation of the historic district’s contributing buildings on Montana Historic Property Record forms; initiating consultation with SHPO regarding any undertaking within the district or within view of the district; working to update the ICRMP for Installations of the MTARNG; continually looking to secure funding for upgrades to buildings located within the district; and interagency discussions to ensure that Section 106 regulations regarding resources within the district are met. Research and protection of heritage resources located within the newly acquired state land is in the beginning stages, with the DMA investing in a formal record search and data review of everything on file with SHPO and the DMA’s Environmental Office regarding the 1,853 acres. A cultural resource consultant has been contracted to conduct the search, review the data, and initiate preliminary mapping with DMA’s GIS specialist. This research has resulted in the identification of heritage properties and will aid the DMA in properly managing those resources.

The DMA has consulted with SHPO four times this past biennium regarding Section 106 requirements, eligibility determinations and an Environmental Assessment of the Fort Harrison Real Property Master Plan, which will evaluate cultural impacts associated with the proposed action. The following table illustrates the consultation and cultural identification efforts that have taken place during this reporting session.

Table C-1. *Cultural identification and consultation efforts regarding heritage properties.*

Project Name/Description and Location	Year Completed	Outcome
Consultation with SHPO regarding expected mitigation measures for removal of T-102 and T-103 at Fort Harrison.	2018-2019	Draft MOA specifying mitigation measures (currently in review with NGB).
Drafting a Memorandum of Agreement for the removal of T-102 & T-103 at Fort Harrison and ongoing Section 106 review and consultation with SHPO.	2018-current	DMA received concurrence regarding an adverse effect determination. Mitigation has been discussed and draft MOA will be sent to SHPO for review.
Research and documentation of three MT Historic Property Records for contributing buildings (T-21, T-23, T-31) within the MTARNG Cantonment District (24LC1949).	2019	Drafts are complete. Forms will be submitted to SHPO during the next reporting session.
Section 106 review and informal consultation with SHPO: assessing the need for a visual impact study for new construction and potential adverse impacts to the MTARNG Cantonment District (24LC1949).	2019	Communication from SHPO stated that based on previous visual impact assessments and cultural resource inventories within the proposed project area, there is a low likelihood that cultural properties will be impacted. Therefore, a cultural resource inventory/visual impact study appears unwarranted.
Requesting a file search with SHPO and reviewing data for the entire cantonment and MTARNG training area at Fort Harrison.	2019	Resulted in the location of cultural resources and preliminary

		mapping of sites to aid the DMA in managing heritage properties.
Consultation with SHPO regarding the eligibility status of sites located within the Fort Harrison state lands.	2019	DMA will work toward eligibility resolution of archaeological sites on state land.
Updating ICRMP for Installations of the MTARNG.	Current	Will result in a newly formatted document that will assist the installation in meeting the legal compliance requirements and will serve as a plan to accomplish the missions of the cultural resources program.
Environmental Assessment for the Fort Harrison Real Property Master Plan at Fort Harrison and Limestone Hills.	Current	Ongoing. Will be released for public comment in 2020.

Stewardship Costs

The overall integrity of the MTARNG Cantonment District (24LC1949) and the primary historic fabric of each contributing building is “fair” to “excellent.” The buildings are stable and are generally monitored and maintained, but many of the buildings do not meet the current building codes and do not serve any organizational purpose for the MTARNG. Therefore, several buildings are either vacant or are utilized for general storage, and remain low priority in regard to maintenance funding. Some of the other historic buildings within the district are occupied by other organizations, and are therefore maintained by those organizations (i.e. Museum of Military History complex & National Guard Thrift Shop complex). The DMA has continued to seek funding in order to properly manage heritage properties within the cantonment district, and during this reporting session renovated one building and improved access to two other buildings within the district. These upgrades included a new roof and interior renovations for building number P-120, and designing new walkways, asphalt, curb and gutters around the Service Club (T-35) and Thrift Shop (T-31) locations. All three of these buildings are contributing elements within the district.

Costs associated with the stewardship of heritage properties on the newly acquired state land at Fort Harrison have included costs associated with data collection, reviewing site information, preliminary mapping of heritage properties, and working toward the resolution of site eligibility. Prior to the completion of this report, the author conducted a file search with SHPO and the DMA for all lands located within the boundaries of the Fort Harrison cantonment and training area. The search included reviewing data for cultural resources located on nearly 7,000 acres of land in order to ensure that all lands within the training area, including the newly acquired state land, has been inventoried for cultural resources, and that the location of all previously recorded sites, regardless of eligibility, are known to the DMA. The in-depth search and review of cultural resource data verified: all of the DMA’s state-owned and DOD lands located at Fort Harrison have been inventoried; the documented cultural resources have been evaluated for their NRHP eligibility; and that there are 13 potential heritage properties that are located within the newly acquired state land. Additionally, data was reviewed for all of the MTARNG buildings located on state land. The review ensured that all of the buildings that were constructed as late as 1971 have been documented on Montana Historic Property Record forms and have been evaluated using NRHP criteria.

The costs associated with the stewardship of heritage resources are seen as investments that increase the value of tangible assets. The building documentation and the consultation with SHPO help ensure the long-term integrity of the historic buildings, and will therefore create financial benefits over time. However, there is no direct increase in value of heritage properties resulting

from the DMA’s investment and stewardship efforts this reporting session. The table below is an estimated itemization of the DMA’s stewardship costs this past biennium.

Table C-2. *Stewardship costs during 2018 and 2019.*

Type of Stewardship Effort/Investment	Cost
Heritage property administration/operations (DMA staff only).	\$49,600
Heritage restoration/rehabilitation/repair project activity (includes only money spent on the maintenance of historic buildings and surrounding landscape within the MTARNG Cantonment District (24LC1949).	\$162,900
Heritage preservation/protection project activity & consultation (includes only money spent on cultural resource management consultants).	\$15,020
Total stewardship cost during 2018 and 2019	\$227,520

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. The DMA takes an active approach in that it focuses on routine maintenance and upgrades whenever possible, and continues to discuss ways to better utilize historic buildings.

Direct impacts to historic buildings have not occurred in the past two years, but there are proposed measures that will directly impact building numbers T-102 and T-103 within the MTARNG Cantonment District at Fort Harrison. Regular maintenance and upgrades to buildings are managed by the DMA with funds that are federally reimbursed, and to some extent, money is allocated based on the buildings existing integrity and its organizational purpose. The DMA is pleased to report that during this biennium, money was properly allocated for the regular maintenance of historic buildings at Fort Harrison. One example is the roof replacement and interior remodeling of building number P-120, a contributing element within the Fort Harrison Cantonment District.

Although basic maintenance needs have been met for historic properties during this reporting session, there are still resources at Fort Harrison that are in need of major upgrades, which include the post movie theater (T-77). The theater is located within the cantonment, but outside of the MTARNG Cantonment District (24LC1949). The theater was assessed for its eligibility as early as 2003 and was recommended as independently eligible for listing in the National Register of Historic Places. It is a single-story, wood-frame structure that officially opened in October of 1942. It provided recreation for the troops training at the fort, and the building is directly associated with the 1942-1943 WWII winterization and expansion period at Fort Harrison.

The DMA has been discussing the fate of the theater for many years, as the building is vacant and does not serve any organizational purpose. MTARNG budgets have been stretched thin in order to maintain the building and stop any further deterioration. The DMA procured funding to complete a structural engineering assessment by a Helena architectural firm in 2009. The assessment identified building deficiencies and maintenance needed in order to minimally preserve the structure, as well as what it will take to bring the mothballed building back into operation under various adaptive reuse scenarios. Scenarios include: re-use as a theater; a cold storage building (for storing everything from beverages and cement bags to cell batteries and canned food); or a fitness and recreation center with daily work-out space.

Interagency ideas regarding the potential for adaptive reuse of the theater were discussed again during the last reporting session, and the unlikelihood of receiving money to rehabilitate the theater is the main shared concern among the various DMA departments. For instance, there is an estimated cost of nearly one million dollars (\$952,000) to renovate and reuse the building as a theater; a cost of \$943,000 for renovating it for use as a recreational center; and \$347,000 to utilize it as a cold storage facility. The assessment focused mainly on walls, roof and window and door openings, with a large portion of the cost having to do with current engineering and seismic design requirements that are compulsory. Additional costs like providing adequate plumbing for restrooms and a functional mechanical electrical system (which do not currently exist), were not included in the cost assessments, and the total projected costs are expected to have increased significantly since 2009. Additional renovation complications come from the fact that the building materials are suspected of containing asbestos, lead paint, mercury and/or PCBs. When the assessment was conducted ten years ago, hazardous materials testing and abatement for the theater was estimated to be over \$300,000 (Mosaic Architecture, 2009). The high cost to renovate a building that does not have the potential to serve a much-needed purpose for the MTARNG, continuously keeps the post theater in an intermediate state.

E. RECORD OF COMPLIANCE WITH THE MONTANA ANTIQUITIES ACT

The DMA complies with the Montana Antiquities Act, which requires that state property managing agencies take into consideration the effects that a proposed undertaking might have on antiquities that are located on lands under their jurisdiction. Additionally, the Act requires that the managing agency consider ways in which potential adverse effects can be avoided or lessened. The DMA has established administrative procedures under the ICRMP for Sites and Training Installations of the MTARNG, which implement the mandates of the Antiquities Act. The procedures specify consultation with the Montana SHPO early in any decision making process that leads to a departmental action.

Preservation Policy and Practice

The purpose of the DMA's cultural resource program is to support the DMA mission, achieve regulatory compliance, and ensure that DMA and MTARNG 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 cultural resource consultants who aid the DMA in meeting their cultural resource responsibilities.

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. 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 ICRMP. The ICRMP is currently being updated, following a standardized NGB template that ensures consistency for National Guard locations nationwide.

The ICRMP establishes priorities for the identification and the 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 inventory status and the evaluation of resources at each site and training installation, and appropriate compliance and management activities for the established period.

Compliance actions are completed by the DMA prior to any ground disturbance activities or construction. 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 an archaeological pedestrian survey on state land prior to new construction; or to determine if the viewshed from historic properties would be affected by the new construction or renovation of a 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 has been working diligently, with help from cultural resource experts, to properly identify, evaluate and protect cultural resources managed by the DMA.

Undertakings involving state owned properties, follow procedures stated in the Montana Antiquities Act. 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, a right-of-way easement for state lands within the Fort Harrison Training Area, and the newly acquired Fort Harrison state land. The Montana Antiquities Act and the Montana Human Skeletal Remains and Burial Sites Protection Act applies on these state-owned lands. Although some informal consultations have taken place with SHPO regarding the eligibility of sites on state land, no projects have been proposed on state lands during this reporting session that have triggered the Montana State Antiquities Act. Therefore, no formal consultations have 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.

National Guard Bureau Installations and Environment (I&E) offers combined annual training to all state personnel as part of the annual Programming Guidance Course (PGC). PGC is offered biannually at the Professional Education Center in Little Rock, Arkansas. Programmed courses change annually, allowing for wide participation nationwide. Cultural resource training is generally offered every other year and includes I&E program updates and introductory classes.

Cultural resource training opportunities are available from various private companies and local, state and federal agencies. The DMA continues to evaluate and look for new training opportunities. Training recommendations for the CRM include:

- Primary Training – Section 106, American Indian consultation workshop and attending I&E cultural resource classes.
- Secondary Training – Agreement documents and Native American Graves Protection and Repatriation Act.
- Tertiary Training – Integrating GIS and cultural resources, and advanced section 106.

Training is crucial for non-environmental DMA personnel 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. The MTARNG continues to look for available resources online that aid in cultural resource management and the continued understanding of applicable laws and regulations, which include:

- Guard Knowledge Online (GKO): NGB's online location for all regulations, guidance, templates and repository for past presentations.
- Advisory Council on Historic Preservation: Provides valuable information of various cultural resource issues and situations – www.achp.gov.
- U.S. Army Corps of Engineers, Seattle District – www.nws.usace.army.mil.
- National Preservation Institute – www.npi.org.

Challenges and Successes in Identification, Evaluation and Protection

The DMA has been successful in meeting their compliance responsibilities in regard to the identification and evaluation of heritage properties. The focus of the DMA during this reporting period has been to:

- Properly document cultural resources;
- Seek a formal finding of effect for projects conducted in training areas;
- Review site data for training areas;
- Seek concurrence from SHPO on all undertakings that are triggered by state or federal compliance regulations; and
- To improve the management of the historic district at Fort Harrison.

As previously discussed, there are some minor challenges to resolving the eligibility of sites on the newly acquired state land, as there are no specific undertakings that are defined for those areas. Additionally, the protection of aging buildings within the Fort Harrison cantonment area remains problematic. Many of the facilities in the MTARNG's portfolio are near or past their lifecycle, resulting in an aging facility inventory in need of modernization. These aging facilities are unable to support modern training and lack sufficient storage space, affecting both training and readiness. The space deficit suffered by the MTARNG continues to be one of their most urgent challenges.

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 challenging. To effectively manage a cultural resources program, coordination is absolutely essential. The CRM makes sure that other DMA and MTARNG offices are aware of the cultural resource program's responsibilities, and communicates regarding 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. The DMA is pleased to announce that it has appropriated funds to complete the agencies cultural resource management goals for the next biennium.

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. The agency intends to manage cultural

resources in a spirit of stewardship for the inspiration and benefit of present and future generations. A focus on effective communication and coordination among DMA personnel 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.

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APPENDIX

Photographs



24LC1258-Bridge crossing creek along the historic Helena to Deer Lodge Stage Road.



24LC1280 Stemwinder Lode-Remains of a concrete foundation and associated building debris.



24LC1280-Overview illustrating the modification of waste rock piles and the installation of a modern safety feature. These site modifications are commonly seen throughout DMA managed sites that are associated with historic mining.



24LC2061-Overview of mining site illustrating an earthen dam and cuts that appear to be the result of hydraulic mining.



24LC2062-Stone foundation associated with the mining site. This is the only site aside from the Austin Mining District that has been recommended as potentially eligible (as a contributing element in the Austin Mining District).



24LC2114-The trench and waste rock pile in this photograph is an example of the typical features that make up each of the mining site located on the state land parcels at Fort Harrison.



24LC2115-Overview of homestead location.



24LC2115-Debris at homestead.



24LC2116-Overview of prospect pits, excavated trenches and footings of a structure at a mine site.



24LC2116-Footings of a structure (possibly a stamp mill).