

THE MONTANA DEPARTMENT OF MILITARY AFFAIRS BIENNIAL REPORT ON HERITAGE PROPERTIES

SUBMITTED TO THE MONTANA PRESERVATION REVIEW BOARD FOR THE
2022 REPORTING YEAR

SUBMITTED BY:

MT Department of Military Affairs
Environmental Division
Fort Harrison, Montana



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**THE MONTANA DEPARTMENT OF MILITARY AFFAIRS
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Cover photo: Soldiers parachute training at Fort Harrison (c. 1942)

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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 sixth biennial report to the Montana Preservation Review Board (Board) as required by Montana Senate Bill 3 (SB3): an act requiring state agencies to biennially report on the status and maintenance needs of agency heritage properties. The DMA has continued 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 (HPR) for historic buildings located within the Montana Army National Guard (MTARNG) Cantonment District; compiled a five-year, Updated Integrated Cultural Resources Management Plan (ICRMP) for Installations of the Montana Army National Guard; signed a Memorandum of Agreement (MOA) for historic properties located at Fort Harrison; mapped all of the documented cultural resources located within the boundaries of Fort William Henry Harrison (Fort Harrison) and Limestone Hills; and drafted informational handouts for the operations and maintenance of buildings located within the historic MTARNG Cantonment District. 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 the State Historic Preservation Office (SHPO).

The DMA is reporting on a total of 29 cultural resources, with 15 resources located within the historic MTARNG Cantonment District at Fort Harrison, one resource located within the cantonment but outside of the historic District, and 13 potential heritage properties located on State land at Fort Harrison.

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 244 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; 14 Readiness Centers (RCs); five Armed Forces Reserve Centers (AFRCs); and eight Maintenance Shops.

DMA and MTARNG land ownership is a mix 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 the DMA has determined that there are no heritage properties at these locations. Any sites or cultural resources located on private or state leased land, which include three local training areas, is not 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, the SHPO and the Board has determined the most appropriate method for the DMA to report on heritage properties under SB3 is to report on the status of the historic MTARNG Cantonment District and other heritage properties located within the Fort Harrison cantonment, even though the land and

buildings are federally owned, and to continue reporting on the status of any DMA identification efforts regarding state-owned properties. 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 29 heritage properties that meet the SB3 reporting criteria, which include: 16 historic buildings that are located on federal land within Fort Harrison’s cantonment; and two eligible and 11 “unresolved” archaeological sites that are located on state land at Fort Harrison. The 13 archaeological sites are located on state land that was formally acquired in 2017 for MTARNG training purposes. A majority of the 13 archaeological sites are associated with historic, small-scale prospecting and mining. Fifteen of the 16 heritage properties located within the cantonment area make up the MTARNG Cantonment District, and one of the properties is an independently eligible building located within the cantonment, but outside of the historic district boundary. The following two tables summarize the 29 heritage properties discussed in this report:

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

Building Number	Type of Building	Year built	In or Out of Historic MTARNG Cantonment District (24LC1949)
T-15	Quartermaster’s Warehouse	1934	In-contributing resource
T-16	Regimental Supply	1928	In-contributing resource
T-18	Museum Visitor’s Center (moved from VA)	c.1942	In-contributing resource
T-19	Dispensary	1933	In-contributing resource
T-21	WWII Officer’s Mess	1942	In-contributing resource
T-28	Regimental Headquarters	1928	In-contributing resource
T-29	Officer’s Latrine	1928	In-contributing resource
T-31 and T-23	Thrift Shop (adjoined buildings)	1942	In-contributing resource
P-32	Public Affairs Office	c. 1962	In-contributing resource
T-34	Officer’s Latrine	1935-37	In-contributing resource
T-35	Service Club	1939	In-contributing resource-
P-120	Armory	1962	In-contributing resource
P-220	Administration	1962	In-contributing resource
P-230	Administration	1962	In-contributing resource
T-77	Post Theater	1942	Out-independently eligible

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

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

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 (Site # 24LC1949)

A majority of the cantonment at Fort Harrison is made up of modern training and administrative buildings, but a centrally located area is home to some of the earliest permanent military structures, which make up the MTARNG Cantonment District. The buildings and structures throughout the cantonment are federal property, but are managed by the DMA and are utilized by civilian and non-civilian workers.

The buildings in the MTARNG Cantonment District and the larger cantonment area represent the state's principal training facility for the National Guard, and make up Montana's original and only permanent MTARNG training facility. The period of significance established for the district is from 1925-1964. The district is made up of 15 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 15 buildings are individually eligible. The buildings are not associated with historically significant people, and do not exhibit distinctive characteristics of a type, period or method of construction, but are associated with significant military events and/or patterns (i.e. initial construction program, WWII expansion and the Cold War era), and are eligible at the state level under Criterion A (National Park Service, Keeper of the NRHP, 2011).

The integrity and primary historic fabric of each contributing building within the district is "fair" to "excellent." Most of the buildings house continuous administrative operations or other services that benefit the MTANRG and general public, and are therefore monitored and receive regular maintenance. However, the buildings that are leased and serve as the thrift shop complex need closer monitoring, as building maintenance is often at the discretion of the lessee.

The overall integrity of the historic district is satisfactory, but has diminished recently due to the removal of two 1926 clay tile company kitchens. The buildings were contributing elements in the district, but were not independently eligible and their physical integrity was poor. They were badly dilapidated and removal was imminent. The last three reporting sessions have discussed the potential removal of T-102 and T-103, with the expectation that the DMA would enter into a Memorandum of Agreement (MOA) with the SHPO.

This reporting session, a MOA was entered into between the National Guard Bureau (NGB), the MTARNG and the SHPO for the removal of T-102 and T-103. The MOA was signed on March 16, 2021, and determined the type and level of compensatory mitigation necessary for building removal. To demonstrate compliance, mitigation was to be completed within a five year period, and the DMA successfully completed the mitigation within the first year of signing the MOA. Mitigation included 3D scanning and Historic American Building Survey documentation of both buildings, and the preservation of clay bricks for future use and/or repair of other historic structures within the cantonment. MOA compliance was formally reviewed and accepted by SHPO in November 2021, and the buildings were removed shortly after. In addition to preserving the company kitchen's clay bricks, the DMA donated historic building materials (i.e. windows) to *Preserve Montana*. The MOA for the company kitchen building removal is now closed.



Historic MTARNG Cantonment District (clockwise from top left): Information kiosk, T-16 Regimental Supply, T-28 Regimental Headquarters and T31 Supply House, T-29 Officer's Latrine, T-35 Service Club, and T-15 Quartermaster's Warehouse.

As stated in the last biennial report, there is still a building located within the cantonment but outside of the historic district that has a “threatened” status. The World War II era Post Theater (T-77) has not served a need or organizational purpose for many years and is at risk of removal. The DMA and MTARNG continues to investigate options for this building. During this reporting session, the DMA contracted for the completion of an updated Montana Historic Property Record, and a summary of various reuse scenarios for the building, which includes the possibility of using the theater as a modern assembly space and conference room, a cold storage building or a fitness/rec center. At this time, no decisions have been made regarding the endangered building.

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
T-15	Quartermaster's Warehouse-1934	Contributing element	Satisfactory	Excellent
T-16	Regimental Supply-1928	Contributing element	Satisfactory	Excellent
T-18	Museum Visitor's Center-1942 (moved)	Contributing element	Satisfactory	Good
T-19	Dispensary-1933 & 1942	Contributing element	Improving	Good
T-21	WWII Officer's Mess-1942 (Thrift Shop)	Contributing element	Watch	Poor
T-28	Regimental Headquarters-1928	Contributing element	Satisfactory	Good
T-29	Officer's Latrine-1928	Contributing element	Satisfactory	Good
T-31 and T-23	Thrift Shop – 1942 (adjoined buildings)	Contributing element	Satisfactory	Fair
P-32	Public Affairs Office-1962	Contributing element	Satisfactory	Good
T-34	Officer's Latrine 1935-1937	Contributing element	Satisfactory	Good
T-35	Service Club-1939	Contributing element	Satisfactory	Excellent
P-120	Armory/Admin -1962	Contributing element	Satisfactory	Excellent
P-220	Administration-1962	Contributing element	Satisfactory	Excellent
P-230	Administration-1962	Contributing element	Satisfactory	Excellent
T-77	WWII Theater-outside of district	Independently eligible	Threatened	Poor

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

The 1,853 acres that make up Fort Harrison's state land training parcels were fully inventoried for heritage properties by the DMA prior to purchasing the land (while they were still under lease). At that time, there were 13 sites identified within the parcels, with two sites recommended as "potentially eligible," and 11 sites recommended as "ineligible" for listing in the National Register of Historic Places (NRHP). However, the cultural studies and site recommendations were not conducted in conjunction with a specific undertaking, and consequently, SHPO was unable to concur with the eligibility recommendations (Warhank, 2008, Murdo, 2019). Therefore, SHPO currently lists the eligibility status of a majority of the 13 sites as "unresolved."

Nearly all of the sites located within the state land parcels 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 and therefore, previous studies have recommended that 11 of the 13 sites are ineligible for listing in the NRHP. 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. The sites 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. Three mining sites are on "watch" status, and they too have relatively poor overall integrity and have been recommended as ineligible. The 11 "unresolved" sites do not meet the NRHP criteria for eligibility as independent resources, but the DMA is treating the 11 sites as heritage properties until their eligibility can be resolved. Eligibility will not be resolved until the DMA has a specific undertaking on those lands that require a submission for Section 106 or Section 110 review between the DMA and SHPO.

In addition to the 11 “unresolved” sites, two sites have been recommended as eligible for listing in the NRHP. These include the Austin Mining District and the Truant Lode mine, a potential contributing element to the Austin district. The Austin Mining District covers approximately 30 square miles and includes private, Forest Service, and DMA lands. The documentation for the district includes a proposed boundary and a statement of eligibility, but does not specify or describe any physical buildings or resources located within the district. The site form and recommendation was recorded in 1993 and states only that “The district is minimally defined at this time...Intensive evaluation for site integrity and significance will be completed at a future date (Park, 1993)”. The DMA is not aware of any additional district documentation since 1993. The Truant Lode placer mine is located within the Austin Mining District boundary. It is not an independently eligible site, but due to its location, it may have the potential to be a contributing element to the district. The DMA is treating the Truant Lode and the Austin Mining District as heritage properties until further work is completed regarding the eligibility designation of those two sites.

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

Site #	Description and NRHP Eligibility Recommendation on Site Form	SHPO NRHP Eligibility Status	Status	Condition
24LC1258	Historic road and travel corridor-Helena to Deer Lodge Stage Road. Historically had only brief use; alignment is altered; two-track fragments are in poor condition. Recommended as not eligible (Rennie, 1995 and HRA, 2007).	Unresolved	Endangered	Failed
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
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
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 potentially a contributing element in the Austin Mining District (24LC1112).	Eligible (potential contributing element)	Watch	Fair
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.			
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
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, and is not a contributing element within the Austin Mining District (24LC1112).	Unresolved	Endangered	Poor
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
24LC2116	Historic mining and prospecting site made up of prospect pits, trenches, one collapsed structure and footings of a structure. 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
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
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
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
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



Sites located on State land within the training grounds at Fort Harrison (clockwise from top left): 24LC2114 prospect pit, remnants of foundation at 24LC2113, mine shaft at 24LC1280, and prospecting concentration at 24LC2062

C. STEWARDSHIP EFFORTS AND COSTS

Consultation and Cultural Resource Identification Efforts

The DMA consulted with SHPO seven times this past biennium regarding Section 106/110 requirements, and has invested money in the research, development and protection of heritage resources located within the cantonment area and state lands at Fort Harrison. Additional money was invested in a Class III cultural resource survey and agency consultation regarding a recently purchased state land parcel in Yellowstone County.

Although negative impacts to two buildings within the MTARNG Cantonment District have occurred, actions have also been underway to not only ensure that future impacts do not occur, but to improve the overall management of the MTARNG Cantonment District. These actions include: the completion of a fully working, 5-year ICRMP for installations of the MTARNG; the creation of an informational handout for the treatment (Operations & Maintenance) of historic buildings; amenities added to the district; the continued in-depth documentation of historic buildings on Montana Historic Property Record forms; initiating consultation with SHPO regarding any undertaking within the district or within view of the district; continually looking to secure funding for upgrades to buildings located within the district; and interagency discussions to ensure that Section 106/110 regulations regarding resources within the district are met. Additionally, it was reported last biennium that preliminary mapping of all cultural resources at Fort Harrison and

Limestone Hills training areas had been initiated, and those geographic information system (GIS) projects were completed during this reporting session. The DMA now facilitates the use of GIS to manage the location, status and condition of cultural resources throughout Fort Harrison.

The following table illustrates the cultural identification efforts and Section 106 consultations that have taken place during this reporting session.

Table C-1. *Cultural identification and consultation efforts, 2020-2021.*

Project Name/Description and Location	Year Completed	Outcome
General Operations & Maintenance informational handout for all historic buildings located within the MTARNG Cantonment District.	2021	In review.
Operations & Maintenance informational handout for buildings P-120, P-220 and P-230 located within the MTARNG Cantonment District.	2021	In review.
Consultation with SHPO regarding the MOA Stipulations of the Demolition and Removal of Buildings T-102 and T-103 at Fort Harrison, Montana.	2021	Complete and closed.
Drafted and signed a MOA for the removal of T-102 & T-103 at Fort Harrison, and ongoing Section 106 review and consultation with SHPO.	2021	Mitigation measures complete. MOA compliance was formally reviewed and accepted by SHPO.
A copy of the signed MOA was sent to Advisory Council on Historic Preservation (ACHP) for their records.	2021	ACHP had no comment.
Consulted with SHPO regarding the sale of the Malta Armory (24PH1074) located on state land. The Armory was recommended as ineligible for listing in the NRHP.	2021	SHPO concurred with the determination of No Adverse Effect.
Consulted with SHPO regarding the sale of the Glasgow Armory (24VL2118) located on state land. The Armory was recommended as ineligible for listing in the NRHP.	2021	SHPO concurred with the determination of No Adverse Effect.
Completed Class III cultural resource investigations of a proposed land purchase by the Department of Military Affairs, in Yellowstone County, Montana. These lands were acquired with state funds and are considered state land.	2021	No NRHP eligible resources were located during the archaeological/cultural investigations.
Consulted with SHPO regarding a proposed state land purchase in Yellowstone County near Billings, Montana. Prehistoric isolate was located and was recommended as ineligible for listing in the NRHP.	2021	SHPO concurred with the ineligible recommendation and determination of No Adverse Effect.
Completed Class III cultural resource investigations of the Sieben Close-In Training Area in Lewis & Clark County, Montana. This training area is located on private land.	2021	Recommendation of no impact to eligible resources.
Consulted with SHPO regarding the proposed land lease for the Sieben Close-In Training Area.	2021	SHPO concurred with the determination of No Adverse Effect.
Contracted for the formal completion of the Historic American Buildings Survey (HABS) architectural and historical documentation of buildings T-102 and T-103.		Final HABS documentation sent to SHPO and National Park Service for review.
Contracted for the completion of the Historic American Buildings Survey (HABS) & photographic documentation for the Montana Army National Guard Company Kitchens (T-102 and T-103).	2021	Completed HABS draft (HABS MT-183) and photographs. Reviewed and

		accepted by SHPO and the National Park Service.
Six Montana Historic Property Records were completed for historic buildings/structures at Fort Harrison, which include building numbers T-18, P-32, T-35, T-518, P-545 and T-554.	2021	Final drafts are on file with the Dept. of Military Affairs Environmental Office.
GIS mapping of all cultural resources located at Fort Harrison and Limestone Hills, offering a complete inventory and location of all documented sites that are managed by the DMA.	2021	Complete and on file with the Dept. of Military Affairs Environmental and GIS Office.
Historic Property Record and reuse recommendations for T-77 (Post Theater) located within the Fort Harrison cantonment, but outside of the historic MTARNG Cantonment District.		Final draft on file with the Dept. of Military Affairs Environmental Office.
Section 106 consultation with SHPO regarding Class III cultural investigations of a proposed airstrip at Fort Harrison.	2020	SHPO concurred with No Adverse Effect recommendation.
Updated Integrated Cultural Resources Management Plan for Installations of the Montana Army National Guard 2021-2025	2020	Resulted in a 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.

Stewardship Costs

The DMA has continued to seek funding in order to properly manage heritage properties. During this reporting session the agency has attained funding to reroof, reside and paint one contributing building (T-18) within the MTARNG Cantonment district; added amenities to the MTARNG Cantonment District, which included new pavement within the district and the installation of a dedication bench at the Military Museum; completed Montana Historic Property Record forms for seven historic buildings within the cantonment; created informational handouts for the O&M of historic buildings within the district; and updated the ICRMP for all MTARNG installations. Additional funding went toward writing up a MOA for buildings T-102 and T-103; the historical HABS and photographic documentation for T-102 and T-103; consultation efforts with SHPO in regard to cultural resource surveys; and the creation of a GIS database to aid the DMA in properly managing cultural resources.

The GIS project included reviewing data for cultural resources located on nearly 7,000 acres of land in order to ensure that all lands at Fort Harrison 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 record search and review of cultural resource data verified that: all of the DMA's state-owned and DOD lands located at Fort Harrison have been inventoried; documented cultural resources have been evaluated for their NRHP eligibility; and that there are 13 potential heritage properties that are located on state lands. Additionally, data was reviewed for all of the buildings located on state land throughout Montana, which include the location of the state's armory buildings. 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 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 2020 and 2021.*

Type of Stewardship Effort/Investment	Cost
Heritage property administration/operations (DMA staff only).	\$75,000.00
Heritage restoration/rehabilitation/repair project activity (includes only money spent on the maintenance of historic buildings within the MTARNG Cantonment District at Fort Harrison).	\$38,791.00
Amenities added to the MTARNG Cantonment District at Fort Harrison.	\$192,312.33
Heritage preservation/protection project activity & consultation (includes only money spent on cultural resource management consultants for S106 and preservation projects).	\$43,858.70
Total stewardship cost during 2020 and 2021	\$349,962.03

D. MAINTENANCE NEEDS FOR HERITAGE PROPERTIES

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. During this biennium, money was properly allocated for the regular maintenance of historic buildings at Fort Harrison.

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 Theater (T-77). The theater is located within the cantonment, but outside of the MTARNG Cantonment District. It is a single-story, wood-frame structure that officially opened in October of 1942 and is recommended as being independently eligible for listing in the NRHP under Criterion A (people and events), for its direct association with the First Special Service Force and the Winterization and Expansion of Fort Harrison during the 1942-1943 build-up, and under Criterion C (architecture), because it may be a scarce example of a WWII era 700 Series, TH-2 Type theater. Visually, the gabled building with a shed roof portico looks purely functional. It lacks ornamentation and has little architectural detail, but research indicates that it has the distinctive characteristics of a particular type, period and method of construction, and may represent a rare surviving example of military building practices during a particular time in history. Previous research resulted in locating few military WWII era theaters, and those still standing in the U.S. today, were typically built on a significantly larger scale, using 800 instead of 700 Series designs, and feature a projecting vestibule rather than a simple, shed roof portico. Building T-77 may be unique, in that other examples of a WWII era 700 Series TH-2 Type post theater have not yet been located.



Front of T-77 Post Theater.



Rear of Post Theater and chimney that provided mechanical exhaust venting.

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. Obtaining adequate financial support for historic buildings that do not serve an organizational purpose remains a challenge for the agency. MTARNG budgets have been stretched thin in order to maintain the theater and stop any further deterioration. Over the past 13 years, the DMA has hired firms to complete a structural engineering assessment for the building and create various adaptive reuse scenarios. Interagency ideas regarding the potential for adaptive reuse of the theater were discussed again during this reporting session, but the scenarios are simply trying to create a demand, where none exist.

The unlikelihood of receiving money to rehabilitate the theater is the main shared concern among the various DMA departments. The estimated costs to renovate and reuse the building are significantly high, due in part to the fact that the building does not have plumbing for restrooms or a functional mechanical electrical system, and costs will have to include current engineering and seismic design requirements that are compulsory for military use of the building. Additional costs will include hazardous materials testing and abatement. 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. The CRM will continue to set goals to go beyond minimal compliance, and to accept the leadership role that the State Antiquities Act envisions for state agencies.

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. During this reporting session, the ICRMP was updated following a standardized NGB template that ensures consistency for National Guard locations nationwide. The draft ICRMP was reviewed by SHPO in July 2020, and the DMA incorporated SHPO's comments and suggestions into the final draft.

The ICRMP establishes priorities and standards for the identification and 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 construction or ground disturbance activity. 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 NRHP. 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, the state land at Fort Harrison and a recently acquired state land parcel in Yellowstone County, near the Billings-Logan International Airport. 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, only one project (proposed land purchase in Yellowstone County) triggered the Montana State Antiquities Act and a formal consultation with SHPO pursuant to MCA 22-3-424 (1) and (2) this reporting session.

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.

Training is also 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.

Challenges and Successes in Identification, Evaluation and Protection

With more than 3,000 personnel working throughout the MTARNG and the DMA in both military and civilian jobs, coordination is absolutely essential to effectively manage a cultural resources program. The DMA has been successful this biennium in departmental coordination and in meeting their compliance responsibilities in regard to the identification, documentation and evaluation of heritage properties. As previously discussed, there are some minor challenges to resolving the eligibility of sites on state land at Fort Harrison, and protecting mothballed buildings like T-77 that are unable to support modern training. However, the DMA and MTARNG will pursue solutions to these challenges and will continue to manage cultural resources in a spirit of stewardship for the inspiration and benefit of present and future generations, while supporting the vital military mission at each of its sites and training installations.

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