

THE MONTANA DEPARTMENT OF MILITARY AFFAIRS BIENNIAL REPORT ON HERITAGE PROPERTIES

SUBMITTED TO THE MONTANA PRESERVATION REVIEW BOARD FOR THE
2024 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: Tank Command training at Fort Harrison (c. 1958). The Galloping Swede is named after J. Hugo Aronson who served as Governor of Montana from 1953-1961 (State of Montana, 1960).

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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 seventh 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.

The agency continues to execute contractual agreements with cultural resource specialists that aid the DMA and the Montana Army National Guard (MTARNG) in meeting their cultural resource responsibilities, and help coordinate consultation between the DMA and the State Historic Preservation Office (SHPO). Within the last two years the DMA has resolved the National Register eligibility status of cultural resources; completed Historic Property Records for buildings located within the MTARNG cantonment; drafted informational handouts for the operation and maintenance of buildings located within the historic MTARNG Cantonment District; and worked toward creating a Memorandum of Understanding (MOU) for curation needs that may arise from future archaeological surveys.

The DMA has assessed nearly 40 heritage properties in the past biennium and is reporting on a total of 31 cultural resources, 14 of which are located on state land and 17 on federal land. Those on federal land fall under the reporting recommendations that were made to the DMA by the Board. The heritage properties reported on this biennium are all located at Fort Harrison, in Lewis & Clark County. Cultural resources were also assessed at MTARNG's Limestone Hills Training Area (LHTA) this past biennium, but those lands are federally owned and are not included in this report.

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 LHTA); two local training areas; 13 Readiness Centers (RCs); five Armed Forces Reserve Centers (AFRCs); and 11 Maintenance Facilities.

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 Facilities 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, is not reported as a DMA heritage property because the Board has requested that leased parcels be reported on by the managing state agency. A majority of Fort Harrison and nearly all of the LHTA consists of federal land that is owned by the Department of Defense and is either leased to the MTARNG by the Army Corps of Engineers or is utilized under a MOU with another federal agency. Currently, all of MTARNG's heritage properties that are reported on under SB3 are located within the cantonment and training area at Fort Harrison.

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.

The DMA has identified a total of 31 heritage properties that meet the SB3 criteria for this biennial report, which include 15 buildings that make up the historic MTARNG Cantonment District, a historic theater located outside of the historic district but within the cantonment (all on federal land), a historic cemetery that is located on federal land outside of the cantonment, but is now a contributing element in a state administered historic district, as well as the Womack Armory and 13 heritage or potential heritage properties located on state land. The following tables summarize the 31 properties discussed in this report:

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

Building Number	Type of Building & Site Number	Year built	In or Out of Historic MTARNG Cantonment District (24LC1949) & Eligibility
T-15	Quartermaster's Warehouse (24LC1949)	1934	In district - Eligible
T-16	Regimental Supply (24LC1949)	1928	In district - Eligible
T-18	Museum Visitor's Center (moved from VA) (24LC1949)	c.1942	In district - Eligible
T-19	Dispensary (24LC1949)	1933	In district - Eligible
T-21	WWII Officer's Mess (24LC1949)	1942	In district - Eligible
T-28	Regimental Headquarters (24LC1949)	1928	In district - Eligible
T-29	Officer's Latrine (24LC1949)	1928	In district - Eligible
T-31 and T-23	Thrift Shop (adjoined buildings) (24LC1949)	1942	In district - Eligible
P-32	Public Affairs Office (24LC1949)	c. 1962	In district - Eligible
T-34	Officer's Latrine (24LC1949)	1935-37	In district - Eligible
T-35	Service Club (24LC1949)	1939	In district - Eligible
P-120	Armory (24LC1949)	1962	In district - Eligible
P-220	Administration (24LC1949)	1962	In district - Eligible
P-230	Administration (24LC1949)	1962	In district - Eligible
T-77	Post Theater (24LC1950)	1942	Out of district - Eligible. Was unresolved.

Table A-2. *Properties located adjacent to the MTARNG cantonment at Fort Harrison.*

Site #	Type of Property	Age/Year built	NRHP Eligibility
24LC1140	Cemetery (on federal land)	c. 1895-1912	Eligible. Was unresolved. Now a contributing resource in the Veterans Hospital Historic District (24LC0123).

Table A-3. *Properties located on state land at Fort Harrison.*

Site #	Type of property	General Location (Township, Range, Section)	NRHP Eligibility
24LC1112	Austin Mining District	30 square miles located on private, federal & DMA land.	Eligible
24LC1258	Historic travel corridor-Helena to Deer Lodge Stage Road	T10N, R4, S7, S8, S16, S17; T10N, R5 S12	Ineligible. Was unresolved.
24LC1276	Historic mining	T10N, R4W, S17	Ineligible. Was unresolved.
24LC1280	Historic mining	T10N, R4W, S17	Ineligible. Was unresolved.
24LC2061	Historic mining	T10N, R4W, S19	Ineligible. Was unresolved.
24LC2062	Historic mining	T10N, R5W, S12	Eligible (potential contributing element in 24LC1112).
24LC2113	Historic mining	T10N, R4W, S7	Ineligible. Was unresolved.
24LC2114	Historic mining	T10N, R5W, S12	Remains unresolved.
24LC2115	Historic debris	T10N, R4W, S7	Ineligible. Was unresolved.

24LC2116	Historic mining	T10N, R4W, S7	Ineligible. Was unresolved.
24LC2117	Historic debris	T10N, R4W, S7	Ineligible. Was unresolved.
24LC2118	Historic mining	T10N, R4W, S18	Ineligible. Was unresolved.
24LC2120	Historic mining	T10N, R4W, S18	Ineligible. Was unresolved.
24LC2243	Womack Armory (1971)	T10N, R4W, S15	Ineligible. Was unresolved.

B. THE STATUS AND CONDITION OF HISTORIC RESOURCES AT FORT HARRISON

The Status and Condition of the Montana Army National Guard Cantonment District (24LC1949) and Post Theater (24LC1950)

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 historic 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 contributing buildings are individually eligible. They 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. Buildings that are leased are monitored by the DMA, but building maintenance is often at the discretion of the lessee. For this reason, there are leased buildings that are on watch status. These buildings retain their overall integrity but have undergone changes that detract from the building’s architectural integrity, mainly in the way of covering original window and door openings, or replacing wood-frame windows with vinyl.

The overall integrity of the historic district is satisfactory and the buildings have remained in good standing over the past biennium. Upgrades and maintenance work that was completed to improve historic buildings during this reporting session include painting buildings P-220 and P-230, both of which are contributing elements in the district, and residing, roofing and painting the historic chapel (T-22). Due to some of the chapel’s modern upgrades, SHPO does not consider this building to be a contributing element in the MTARNG Cantonment District, but it retains enough integrity to relay its historic significance and remains an important focal point within the district.

As stated in previous biennial reports, there is still one heritage property that is 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. SHPO listed the eligibility of the Post Theater as “Undetermined” for many years, but the eligibility of the theater was resolved during this reporting session and the theater is now considered an independently eligible resource. The theater is an architecturally appealing building, as it is a basic, rectangular gabled structure covered in asbestos shingle siding and has a small, shed roof portico. However, early documentation and eligibility assessments recommended that the theater may be independently eligible under Criterion A, for its direct association with the First Special Service Force and the 1942-1943 Winterization & Expansion Period that took place at Fort Harrison. The theater is also potentially eligible under Criterion C, because it appears to be a scarce example of a WWII era 700 Series, TH-2 Type theater. The theater 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 (Krigbaum, 2020). To date, another example of this TH-2 Type theater has not been located. This reporting session, the DMA recommended that the eligibility status of the theater be changed from “Undetermined” to “Eligible,” and the SHPO concurred.



Front of T-77 Post Theater.



Rear of Post Theater (chimney provided mechanical exhaust venting).

The DMA and MTARNG continue to investigate options for the T-77 Theater. The building is in poor condition and receives only enough maintenance to keep the building from further deterioration. Over the years, various reuse scenarios have been proposed and reviewed, but no formal decisions have been made regarding the endangered building, and its future remains unresolved. Unfortunately, a building located within the cantonment that is in poor condition and is not serving the operations of the MTARNG is at great risk of removal, and there is a high likelihood that the theater will be razed.

Table B-1. Status and condition of heritage properties located within the MTARNG Cantonment District and the Post Theater

Building number	Type of building	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	Fair
T-28	Regimental Headquarters-1928	Contributing element	Satisfactory	Good
T-29	Officer’s Latrine-1928	Contributing element	Satisfactory/ Watch	Good

T-31 and T-23	Thrift Shop – 1942 (adjoined buildings)	Contributing element	Satisfactory/ Watch	Good
P-32	Public Affairs Office-1962	Contributing element	Satisfactory	Good
T-34	Officer’s Latrine1935-1937	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	Endangered	Poor

The Status and Condition of the Post Cemetery (24LC1140)

Just outside of, but adjacent to the MTARNG cantonment lies a historic post cemetery, where a small number of Civil, Indian and Spanish-American war veterans and their families were once interred. The cemetery has a threatened status and its condition is poor. It encompasses 0.89 acres and has an interesting history, but no longer serves as a cemetery. In 1948, those buried at the cemetery were moved to Custer National Cemetery near Hardin, Montana, as part of a nation-wide centralization program to provide better upkeep of cemeteries for war veterans. The Post Cemetery is significant in part, for its association with the 24th Infantry, an all-black regiment known as the Buffalo Soldiers. Over one-half of the soldiers (retired and active) that were interred at the Post Cemetery are known to be associated with the 24th Infantry, and a majority of the interments occurred between 1895 and 1912 (Krigbaum & Jenks, 2005).

The cemetery has experienced a loss of integrity. It lacks landscaping, roads, paths or any features that would indicate the purpose it once served. It is a threatened resource in the sense that it is located within MTARNG’s firing range and is not accessible to the public or maintained in any way. It is a flat, open field covered in grass and is marked only by a steel rail that surrounds the one-acre parcel. The rail serves as an avoidance measure, and the MTARNG avoids the property during training exercises.

The cemetery is located on federal land and the eligibility of the site had remained unresolved for many years. Although it is a unique and interesting property, it lacks integrity and does not meet the National Register criteria as an independent resource. However, the eligibility was resolved this reporting session as part of the Facilities Management Undertaking. Because the cemetery is not an independently eligible resource, but is still believed to be an important and unique cultural resource, the DMA and SHPO agreed that a proper solution would be to add it as a contributing resource to a historic district. The use of the cemetery is believed to have been relatively short lived (c.1895-1912) and the period of significance does not fall within the dates of significance that have been established for the MTARNG Cantonment District (1925-1964). Therefore, the DMA and SHPO agreed to continue to treat the cemetery as a heritage property and add it as a contributing element to the Veterans’ Hospital Historic District (24LC0123), which is managed by another state agency (Veteran’s Affairs Division). The Hospital District’s significance is associated with Fort Harrison’s operations first as a military facility (1894-1912) and then as a Veteran’s Affairs hospital (1919-present). The boundaries of the hospital district do not include the adjacent MTARNG training facility where the post cemetery is located, but the cemetery could be added as a non-contiguous contributing element in the district.

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 have been fully inventoried for heritage properties and 14 sites have been identified. The original studies recommended two sites as "potentially eligible," and 12 as "ineligible" for listing in the National Register of Historic Places (NRHP). However, SHPO was unable to concur with the eligibility recommendations and listed the eligibility status of a majority of the 14 sites as "unresolved." This unresolved status has remained for many years, but this past biennium the DMA's Facility Management Undertaking and consultation with SHPO resolved the eligibility of 11 of the 14 sites that are located on state land.

As reported in the last biennial report, the unresolved eligibility status for a majority of the cultural resources located on DMA administered lands could not be resolved until the DMA had a specific undertaking on those lands that required a submission for Section 106 or Section 110 review between the DMA and SHPO. The DMA has not had any specific undertakings that involve areas where the 14 sites are located, and was not sure how to work toward site eligibility resolution. After initiating consultation with SHPO in 2022, the DMA created an undertaking specifically designed to reassess sites with an undetermined eligibility status and seek SHPO concurrence with the updated eligibility justifications and recommendations.

The Facilities Management Undertaking at Fort Harrison took place in four phases and involved 26 sites, with 14 potential heritage properties located on state land. Nearly all of the sites located within the state land parcels are associated with historic prospect mining and are 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, one is a historic travel corridor and one is an armory.

For the most part, the sites lack overall integrity and therefore, previous studies have recommended that 12 of the 14 sites are ineligible for listing in the NRHP. A majority of the historic mining sites are not well-developed. 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. The prehistoric stone tool site has been relocated many times, but no artifacts or other indicators of the site remain, and the historic travel corridor, which did not serve as a major travel corridor for any length of time, has also experienced a major loss of integrity.

A majority of the sites located on state land have been reported as having 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 Facilities Management Undertaking re-assessed and evaluated 11 of the 14 sites and recommended them as ineligible, as they are unable to meet the NRHP criteria for eligibility as independent resources. Additionally, the mining sites involved in the undertaking are located outside of any mining district boundary, and do not have the potential to serve as contributing elements in a mining district.

In addition to the archaeological sites, one historic building located on state land was reassessed for its National Register eligibility. The Womack Armory is located adjacent to the MTARNG cantonment and was built in 1971. It was previously recommended as ineligible, but its eligibility remained "unresolved" with the SHPO. The DMA presented an in-depth reassessment with an ineligible justification, and SHPO concurred.

With some follow-up questions and communications, 11 of the 14 cultural resources now have a resolved eligibility and are no longer considered potential heritage properties. However, this

determination will not change the way the cultural resources are managed by the DMA, as they will continue to be reassessed in future undertakings that require Section 106 or Section 110 review.

Additional sites on state land that were not reassessed under the Facilities Management Undertaking include the Austin Mining District (24LC112), and a small mining/prospecting site (24LC2114) and the Truant Lode mine (24LC2062), both of which are located within the boundaries of the Austin Mining District. Although the two sites are not independently eligible, they could be reevaluated as contributing elements in the Austin Mining District.

The Austin Mining District is listed as an eligible heritage property by the SHPO, but there is currently little evidence for its eligibility. 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 general 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 documentation recommends a more intensive evaluation of site integrity and significance in order to make a formal determination of eligibility, but the DMA is not aware of any updated district documentation or evaluation since 1993.

The significance of mining sites located within the historic boundaries of the Austin Mining District will continue to be difficult to evaluate as contributing or noncontributing resources until the district itself is fully evaluated. With a majority of the Austin Mining District located outside of DMA managed lands, it is unlikely that the DMA will be creating an in-depth contextual history for the district, and therefore, the eligibility of the Truant Lode and the small-scale mining resource located within the boundary of the proposed district will remain undetermined until the district is further assessed. The DMA will continue to treat the two mining sites within the district as potential heritage properties until further documentation and eligibility justifications are made for the Austin Mining District.

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
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
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).	Was unresolved and is now ineligible	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).	Was unresolved and is now ineligible	Endangered	Failed

	Recommended as not eligible (GCM, 1996 and HRA, 2007).			
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).	Was unresolved and is now ineligible	Endangered	Failed
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 is potentially a contributing element in the Austin Mining District (24LC1112).	Eligible (potential contributing element)	Watch	Unknown
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).	Was unresolved and is now ineligible	Endangered	Failed
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 due to a lack of integrity, is unlikely to be a contributing element in the Austin Mining District (24LC1112).	Unresolved	Endangered	Failed
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).	Was unresolved and is now ineligible	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).	Was unresolved and is now ineligible	Endangered	Failed
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).	Was unresolved and is now ineligible	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).	Was unresolved and is now ineligible	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).	Was unresolved and is now ineligible	Endangered	Failed
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).	Was unresolved and is now ineligible	Endangered	Failed
24LC2243	Womack Armory (1971) Recommended as not eligible (Krigbaum, 2012)	Was unresolved and is now ineligible	Satisfactory	Excellent



Sample of sites located at Fort Harrison that were reassessed for their National Register eligibility in the Facilities Management Undertaking (clockwise from top left): Overview of 24LC0735 precontact site, view of 24LC1140 post cemetery (Spaulding, 2024), Womack Armory 24LC2243 and historic mining at 24LC2113.

C. STEWARDSHIP EFFORTS AND COSTS

Consultation and Cultural Resource Identification Efforts

The DMA's main focus this reporting session was to invest in the eligibility resolution of cultural resources, which included historic and prehistoric sites. As previously mentioned, the DMA resolved the eligibility of 32 sites, 11 of which are located on state land. Additionally, the agency invested money in the research, development and protection of heritage resources located at Fort Harrison, artifact curation research, and in the acquisition and disposal of state-owned property, all of which resulted in numerous formal consultations with the SHPO.

The DMA has focused on ensuring that future impacts do not occur to the MTARNG Cantonment District by improving the overall management through the creation of informational handouts for the operations & maintenance (O&M) of historic buildings. As reported last biennium, an O&M brief was created for the general management of buildings within the MTARNG Cantonment District, and this biennium handouts were created for individual buildings that require additional oversight. O&M informational handouts were created for the T-35 Service Club and the Thrift Shop complex of buildings (T-21, T-23, T-28 and T-31). The c.1939 Service Club is a building utilized by civilian and non-civilian groups. It tends to be heavily monitored and receives regular upgrades, while the thrift shop buildings are leased to a non-profit and O&M is often at the discretion of the lessee. The O&M briefs summarize the significance and historic character defining features of each building, the "do's and don'ts" for O&M activities and types of building changes that require agency consultation.

Additional protection of heritage resources by the DMA has been in the form of completing in-depth documentation of historic buildings located within the cantonment. Historic Property Records were completed for buildings T-34 (1939 officer's latrine) and P-40 (1962 Post Exchange), both of which are located within the MTARNG Cantonment District. T-34 is a contributing element and building P-40 was presumed to be a non-contributing element, but was never formally documented and assessed until last year.

This past biennium the DMA worked toward establishing a MOU for artifact curation. The MTARNG essentially has two major archaeological collections, which include artifacts collected from lands that were previously managed by the Bureau of Land Management at the LHTA, and military history collections curated at the Montana Military Museum at Fort Harrison. However, these collections are not managed or maintained by the DMA and the DMA does not currently maintain a curation agreement with any outside party. The agency currently operates under a no-collection policy for archaeological resources, as collection is determined to be an "Adverse Effect". However, the DMA is in need of an option for curation if future studies locate artifacts that are unique or have important information potential, and it is important that the DMA have the appropriate information to ensure that archaeological studies and any future collection and curation of artifacts is done correctly.

A summary of findings and informal consultation with the SHPO recently took place to determine options for future curation. The background information summarized the need for a curation agreement, artifact collection policies on state and federal land, information about potential curation agreements and input from various sources. The information will aid the DMA in working toward a curation agreement with a federally compliant facility.

Additional DMA stewardship efforts took place throughout this reporting session in the way of interdepartmental and interagency discussions. These discussions take place formally and

informally throughout the year, to ensure that state and federal projects do not carelessly destroy cultural resources.

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

Table C-1. *Cultural identification and consultation efforts.*

Project Name/Description and Location	Year Completed	Outcome
Historic Property Record for buildings T-34 and P-40 located within the historic MTARNG Cantonment District.	2022	Complete and closed.
Phase I site eligibility resolution (Facilities Management Undertaking) for cultural resources located at Fort Harrison.	2022	SHPO concurred with site eligibility recommendations.
Phase II site eligibility resolution (Facilities Management Undertaking) for cultural resources located at Fort Harrison.	2022	SHPO concurred with site eligibility recommendations. Project is complete and closed.
Consultation with SHPO regarding the sale/disposal of state property (1961 Cold War era Anaconda Armory)	2022	SHPO concurred with a determination of No Adverse Effect.
Consultation with SHPO regarding the sale/disposal of state property (1961 Cold War era Butte Armory)	2022	SHPO concurred with a determination of No Adverse Effect.
Phase III site eligibility resolution (Facilities Management Undertaking) for cultural resources located at Fort Harrison.	2023	SHPO concurred with site eligibility recommendations. Project is complete and closed.
Phase IV site eligibility resolution (Facilities Management Undertaking) for cultural resources located at Fort Harrison.	2023	SHPO concurred with site eligibility recommendations. Project is complete and closed.
Operations & Maintenance informational handouts for MTARNG Thrift Shop buildings T-21, T-23, T-28 & T-31 located within the MTARNG Cantonment District.	2023	Project is complete and closed. Final drafts are on file with the Dept. of Military Affairs Environmental Office.
Updated the Operations & Maintenance informational handouts for buildings P-120, P-220 and P-230 located within the MTARNG Cantonment District.	2023	Project is complete and closed. Final drafts are on file with the Dept. of Military Affairs Environmental Office.
Operations & Maintenance informational handout for building T-35 (Service Club) located within the MTARNG Cantonment District.	2023	Project is complete and closed. Final draft is on file with the Dept. of Military Affairs Environmental Office.
Continuation of cataloguing DMA cultural resource studies, site forms and communications that have been archived in various offices/locations.	2023	Project is ongoing.
Worked toward creating a MOU for curation needs that may arise from future archaeological surveys.	2023	Resulted in a document that will assist the installation in meeting the legal compliance requirements for curation. Project is ongoing.
Cultural Resource Survey and continued consultation with SHPO regarding the construction of the Limited Army Aviation Support Facility in Billings.	2023	SHPO concurred with a determination of No Adverse Effect.
Drafted a Cultural Site Record Update form for a precontact site (24LC0735) located at Fort Harrison. This was a site assessment request from SHPO to close out the Phase I Facilities Management Undertaking (site eligibility resolution) at Fort Harrison.	2023	SHPO is currently reviewing.

Stewardship Costs

The DMA continuously seeks funding for managing heritage properties. During this reporting session the agency attained funds to maintain and upgrade historic buildings; fully documented and created O&M handouts for historic buildings; and resolved the eligibility status of cultural resources. Additional funding went toward researching a MOU for curation, cataloging cultural resources and interagency consultation efforts.

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 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 2022 and 2023.*

Type of Stewardship Effort/Investment	Cost
Heritage property administration/operations (DMA staff only).	\$72,000.00
Heritage restoration/rehabilitation/repair project activity (includes only money spent on the maintenance of historic buildings within the MTARNG Cantonment District at Fort Harrison).	\$284,859.00
Heritage preservation/protection project activity & consultation (includes only money spent on cultural resource management consultants).	\$41,233.00
Total stewardship cost during 2022 and 2023	\$398,092.00



Historic buildings located within the MTARNG Cantonment District that received recent upgrades (clockwise from top left): P-220, P-230, and Chapel.

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. 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.

The basic maintenance needs have been met for a majority of MTARNG's historic properties during this reporting session, but as previously discussed, the Post Theater (T-77) is still in need of major upgrades. The theater is located within the cantonment, but outside of the historic MTARNG Cantonment District. It is a single-story, wood-frame structure that officially opened in October of 1942. It is 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. Other examples of a WWII era 700 Series TH-2 Type post theater have not yet been located.

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. The DMA has hired firms to complete a structural engineering assessment for the building and create 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 insurmountable.

The unlikelihood of ever receiving federal funds 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 or a functional mechanical or 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 asbestos 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, and the removal of this building appears imminent.

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. The DMA has established administrative procedures under the Integrated Cultural Resources Management Plan (ICRMP) for Sites and

Training Installations of the MTARNG, which implement the mandates of the Antiquities Act. 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. The procedures in the ICRMP 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 Program Manager, who also serves as the Cultural Resource Manager (CRM). With more than 3,000 personnel working throughout the MTARNG and the DMA in both military and civilian jobs, coordination among various departments and consultants is absolutely essential to effectively manage a cultural resources program. 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.

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 buildings within the MTARNG Cantonment District 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. 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 and state land at Fort Harrison. The Montana Antiquities Act and the Montana Human Skeletal Remains and Burial Sites Protection Act applies on these state-owned lands. Several projects triggered the Montana State Antiquities Act and formal consultations with SHPO 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.

Challenges and Successes in Identification, Evaluation and Protection

The DMA and MTARNG has been successful this biennium in meeting their compliance responsibilities in regard to the identification, documentation and evaluation of heritage properties. The DMA pursued solutions and formally resolved the eligibility of 32 cultural resources during the past two years, 11 of which are on state land, and invested in the O&M of heritage properties.

There are challenges to resolving the eligibility of some cultural resources and protecting mothballed buildings that are unable to support modern training, but the DMA and MTARNG will continue to pursue solutions and will continue to manage cultural resources in a spirit of stewardship while supporting the vital military mission at each of its sites and training installations.

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