Great Falls – Cascade County Historic Preservation Advisory Commission Minutes from the February 14, 2024 meeting, held in the Gibson Room at the Civic Center

Members Present: Steve Taylor, Channing Hartelius, Ellen Sievert, Chris Christiaens, Ken Sievert, Suzanne Waring, Ken Robison, Rich Ecke, Carol Bronson Members Absent: none Staff Present: Samantha Long Ex-Officio Members Present: Rae Grulkowski, Joe McKenney

The meeting was called to order by Chris Christiaens at 12:03 PM

1. Approval of Meeting Minutes – January 10, 2023

• <u>Carol Bronson moved to approve the minutes as written. Ken Robison seconded, and the motion carried.</u>

2. HPO Report

- Sam attended the State Historic Preservation Review Board meeting on Jan 25 to support the Baatz Building nomination. The nomination was recommended for acceptance and forwarded to the Keeper of the National Register of Historic Places.
- Sam, Rich, Ken R., and Chris will attend Preservation Cascade's meeting on 2/19 to update them on our efforts so far to preserve the Boston & MT Barn and invite them to become a partner in our effort.
- A TIF request has been submitted for façade alterations to the Corey Block downtown. While the building was built in 1890, it has lost a significant amount of integrity due to extensive exterior changes. Sam does not feel that the proposed changes will detract any further from the building's retaining integrity.
- Sam is reviewing a Section 106 consultation for a cell tower co-location on the roof of the Columbus Center.
- The City's annual board training is coming up on 2/20 and 2/21 at 5:30. City board appointees are required to attend training every two years.
- Plans for the upcoming Montana History Conference are beginning to gel, and the deadline to submit session proposals is approaching on March 3.

3. Annual CLG Grant Request

- Sam presented the annual grant requesting \$6,000 from the State Historic Preservation Office to support our local historic preservation program, and requested a motion to approve it for submission.
- <u>Rich Ecke moved to approve the annual CLG grant request to SHPO. Ken Sievert</u> <u>seconded, and the motion carried.</u>

4. 2024 Preservation Awards

• Sam has been brainstorming with Kristi Scott at The History Museum to think of ways that our two organizations can collaborate and better serve our community. An obvious example seemed to be combining our Preservation Awards with their Legacy Awards. This would reduce the work for staff of both organizations, reduce donor fatigue as we tend to go to the same people for sponsorships, increase combined attendance, and provide us both with an opportunity to educate a new audience about our respective missions. She asked the Commission for guidance on whether to proceed with the plan. The Commission discussed the prospect and agreed to proceed, with the request that there

be a distinction between the Preservation and Legacy awards when they are presented at the same event.

• Ellen moved to direct the HPO to plan a collaborative event with The History Museum for this year's Preservation Awards. Ken Robison seconded, and the motion carried.

5. Highland Development/Portage NHL Section 106 Report

• The Highland Development consulting group is beginning a draft Memorandum of Agreement, which will contain the group's consensus on the mitigation measures that will be required. Sam will distribute a copy of the draft with the packet for the next meeting and relay HPAC's comments to the consulting group.

6. Update on Activities of the Mary Fields Committee

• On March 15 there will be a gathering at the Masonic Temple in Cascade to raise funds for a statue of Mary Fields. Channing and Frank Laliberty will both be presenting on area history and the life of Fields.

7. Boston and Montana Barn Report

• No new report

8. Vinegar Jones Cabin Committee Report

• No new report

9. Reports from Commissioners

- Suzanne Waring announced that the Brother Van Museum had been selected as one of the locations to host a tour at the upcoming Montana History Conference.
- Ellen noted other locations that would be featured, such as the Ursuline Center, Paris Gibson Square, and the CM Russell Studio.
- Ken Robison reiterated the upcoming deadline to submit lecture proposals for the Conference, and encouraged anyone with a subject in mind to submit a proposal.

10. Public Comment

• There was no public comment.

Channing Hartelius adjourned the meeting at 12:46 PM.

MEMORANDUM OF AGREEMENT AMONG THE RURAL HOUSING SERVICE, MONTANA STATE HISTORIC PRESERVATION OFFICER, NATIONAL PARK SERVICE, AND ADVISORY COUNCIL ON HISTORIC PRESERVATION REGARDING THE NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT, GREAT FALLS, MONTANA

WHEREAS, NeighborWorks Great Falls (NWGF), plans to construct a multiphase housing development on an approximately 123.8 acre site located in Great Falls, Cascade County, Montana (Project). The site is located in the southwest quarter of Section 19, Township 20 North, Range 3 East, latitude 47°28'13" and longitude -111°16'48; and

Whereas, NeighborWorks Great Falls has requested a Mutual Self-Help Housing Technical Assistance Grant from the Rural Housing Service (RHS) for Phases I and II of the planned development; and

WHEREAS, the requested funding may be used by NeighborWorks Great Falls to provide technical and supervisory assistance to low- and very-low income individuals and families as they construct their own single-family homes; and

WHEREAS, the RHS is authorized to provide the requested grant funding pursuant to Section 523 of the Housing Act of 1949 and Rural Development's Mutual Self-Help Housing Development Regulation 7 CFR 1944, Subpart I, Mutual Self-Help Technical Assistance Grants; and

WHEREAS, if RHS elects to provide the requested funding, the proposed Project will be an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C 306108, and its implementing regulations, 36 C.F.R. Part 800; and

WHEREAS, RHS has defined the undertaking's area of potential effect (APE) as the Great Falls Portage National Historic Landmark, Lower Portage (24CA238); and

WHEREAS RHS has determined that the undertaking will have an adverse effect on the Great Falls Portage National Historic Landmark, Lower Portage (24CA238), which is a National Historic Landmark, and the Lewis and Clark National Historic Trail (24CA1711), and has consulted with the Montana State Historic Preservation Office(MT SHPO) and National Park Service's National Historic Landmarks Program and National Historic Trails Program (NPS) pursuant to 36 C.F.R. Part 800; and

WHEREAS, in accordance with 36 CFR § 800.6(a)(1), RHS notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination with specified documentation, and the ACHP has chosen to participate in the consultation pursuant to 36 CFR § 800.6(a)(1)(iii) on ------; and

WHEREAS, RHS has determined the following Federally recognized tribes may have an interest in the undertaking and invited them to participate in

the Section 106 consultation in letters dated -----, 2023: Apache Tribe of Oklahoma, Blackfeet Tribe of the Blackfeet Indian Reservation of Montana, Crow Tribe of Montana, Fort Belknap Indian Community, and the Little Shell Tribe of Chippewa Indians.

WHEREAS, only the Little Shell Tribe of Chippewa Indians Tribe responded to the invitation to participate; and

WHEREAS, RHS has consulted with the following parties regarding the effects of the undertaking on historic properties: and has invited them to sign this MOA as concurring parties: The Lewis and Clark Trail Heritage Foundation, National Trust for Historic Preservation, Preserve Montana, Lewis and Clark Interpretive Center, City of Great Falls Historic preservation Officer (City HPO), Portage Rout Chapter of Lewis and Clark Trail Honor Guard, Lewis and Clark Interpretive Center Foundation, Great Falls Habitat for Humanity, Home Builders Association of Great Falls, Great Falls Housing Authority, Indian Family Health Clinic, Great Falls Development Authority, City of Great Falls (City) Planning and Community Development, Great Falls Chamber of Commerce, Cascade County Planning Department, Great Falls Montana Tourism Office; and

WHEREAS, RHS has afforded members of the general public and other interested parties to participate in and comment on this undertaking in accordance with the public review process in 7 CFR 1970.14 and 36 CFR 800.2(d)(1). A local newspaper advertisement was published on -----, 2024, and -----, 2024, in the ------. The -----day comment period ended on -----, 2024. RHS received no comments; and;

WHEREAS, in accordance with 36 C.F.R. § 800.6(a)(1), RHS has notified the Advisory Council on Historic Preservation (ACHP) of its adverse effect determination providing the specified documentation, and the ACHP has participated in the consultation pursuant to 36 C.F.R. § 800.6(a)(1)(iii);

NOW, THEREFORE, RHS, the MT SHPO, National Park Service, and the ACHP agree that the undertaking shall be implemented in accordance with the following stipulations in order to take into account the effect of the undertaking on historic properties.

STIPULATIONS

RHS shall ensure that the following measures are carried out:

I. ROLES AND RESPONSIBILITIES

The following sections outline the roles of the Signatories and participating consulting parties in the execution of this MOA:

A. RHS (Signatory) shall:

- 1. Provide annual reports to the group regarding progress and status of the MOA.
- Coordinate with NeighborWorks Great Falls to ensure deadlines outlined in the MOA are being met and notify Signatories and consulting parties if and when benchmarks cannot be met.

3. Coordinate with NeighborWorks Gret Fals to ensure that construction contracting documents shall include post-review discovery requirements provided in Stipulation V, including contact names and telephone numbers for the RHS and MT SHPO, and that their contractors are familiar with and abide by those requirements.

B. MT SHPO (Signatory) shall:

- Review and comment on submittals of draft mitigation materials, survey reports, and/or treatment plans, as relevant, in a timely manner (within 30 calendar days).
- Consult regarding the need for additional identification and evaluation efforts.
- Support through expertise successful completion of mitigation, preservation, and recordation efforts as outlined in the MOA.

C. National Park Service (Signatory) shall:

- Review and comment on submittals of draft mitigation materials, survey reports, and/or treatment plans, as relevant, in a timely manner (within 30 calendar days).
- Consult regarding the need for additional identification and evaluation efforts.
- Support through expertise successful completion of mitigation, preservation, and recordation efforts as outlined in the MOA.

D. ACHP (Signatory) shall:

- 1. Serve as repository for the executed MOA and subsequent amendments and arbiter of disputes.
- Review and comment on submittals of draft mitigation materials, survey reports, and/or treatment plans, as relevant, in a timely manner (within 30calendar days).
- Support through expertise successful completion of mitigation, preservation, and recordation efforts as outlined in the MOA.

D. NeighborWorks Great Falls shall

- 1. Develop and implement a plan for a _____-acre publicly accessible park, ensuring preservation of the existing viewshed located in the northwest corner of the site and incorporation of native and dryland plant species. The park shall include interpretive signage, a Pavilion Overlook. The park should include guidelines for public use that are developed in collaboration with the City of Great Falls (City) and included in the project development agreement with the City.
- 2. establish and maintain the ±30-foot easement along 33rd Ave S & 13th St S to facilitate public use and future connections. Provide a xx-foot wide trail and interpretive signage. Provide easement documents that are filed with the local jurisdiction. Work with the local community and historic groups to enhance accessibility and connectivity.

- 3. adhere to Development Standards that prioritize low-profile single-family homes in designated areas and limit the height of multifamily structures or commercial structures, maintaining the visual harmony of the surrounding landscape. These Development Standards should be included in the development agreement for the project that is ultimately approved and enforced by the City of Great Falls.
- 4. implement a comprehensive night sky-friendly lighting design plan for the entire development, minimizing light pollution to protect the natural nighttime environment. This plan should comply with City of Great Falls code requirements and other requirements as established in the Development Standards.
- 5. develop and enforce Development Standards for all phases of the project, ensuring that future development adheres to MOA guidelines. These Development Standards shall be incorporated into the City of Great Falls Development Agreement and run with the land ensuring future phases meet all requirements.
- 6. collaborate with the City to create a City Development Agreement that incorporates all elements of this MOA. This agreement will define the roles and responsibilities of all parties involved in the project, including monitoring and enforcement mechanisms.
- 7. complete conduct a viewshed analysis using the inventory process outlined by the U.S. National Park Service. Identify scenic views within the project area and implement measures to preserve and enhance these views, considering the recommendations provided by the National Park Service.
- coordinate with the City HPO, to initiate the installation of brown highway markers on 10th Ave South for the Portage Route National Historic Landmark.
- 9. seek input and suggestions from local experts regarding signage along the trail through Highland.
- 10. work with the local historical preservation groups and Lewis and Clark entities to design and expand the story and interpretation currently found in the portage route. Examples might include funding or match opportunities, trail or overlook site improvements, signage and wayfinding expansion, GIS Data tools, mapping, and interactive apps.

E. Consulting Parties (Concurring Parties) shall:

1. Review and comment on submittals of draft mitigation materials, survey reports, or treatment plans, as relevant, in a timely manner (within 30calendar days).

II. PROFESSIONAL QUALIFICATIONS AND STANDARDS

A. Professional Qualifications

RHS will coordinate with NeighborWorks Great Falls to ensure that all archeological and historical studies required under the terms of this MOA shall be carried out by, or under the direct supervision of, a professional who, at a minimum, meets the Secretary of the Interior's (SOI's) Professional Qualifications Standards (i.e., SOI qualified; 48 FR 44716, September 29, 1983, and 62 FR 33708, June 20, 1997) in archeology, history, or architectural history, as appropriate.

B. Relevant Standards and Guidelines

RHS shall coordinate with NeighborWorks Great Falls to ensure that all cultural resources investigations, documentation, and preservation work performed pursuant to this MOA will be implemented in accordance with the following regulations, policies, standards, and guidelines, or any subsequent replacements of or revisions to the same, as appropriate:

- Section 106, NHPA, as amended, and its implementing regulations (36 CFR § 800)
- The Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Buildings (National Park Service 2017)
- Heritage Documentation Programs, HABS/HAER/HALS Photography Guidelines (National Park Service November 2011, updated June 2015)
- ACHP's Section 106 Archaeology Guidance (https://www.achp.gov/protecting-historicproperties/Section_106_Archaeology_Guidance)
- Native American Graves Protection and Repatriation Act (NAGPRA) of 1990 (43 CFR § 10, as amended)
- Policy Statement Regarding Treatment of Burial Sites, Human Remains and Funerary Objects (ACHP, February 23, 2007)

III. PHASING PROPOSAL

IV. TREATMENT MEASURES

A. Ongoing Coordination Regarding Archeological Resources

RHS will coordinate with NeighborWorks Great Falls to ensure they assess, using the steps outlined below, the potential for intact archeological deposits to exist within the direct APE. The assessment will be conducted by an SOI- qualified archeologist who will prepare written documentation, including survey/monitoring recommendations, if justified, for review by the MT SHPO and other interested parties. If deemed warranted through consultation, NeighborWorks Great Falls will ensure that any archeological investigations and/or monitoring shall be performed in accordance with the standards and guidelines in Stipulation II.

- NeighborWorks Great Falls shall consult with the MT SHPO on the footprint for the undertaking based on the nature of the proposed impacts, including area and depth of disturbance.
- NeighborWorks Great Falls shall review existing information on archeological resources within the APE and seek information, as appropriate from consulting parties, Indian Tribes, other

individuals, and organizations likely to have knowledge of, or concerns with, cultural resources in the area. If sites of Native American origin are encountered, this consultation shall include Indian Tribes who have indicated their interest in consulting on federal undertakings in Cascade County.

- 3. NeighborWorks Great Falls shall ensure that an adequate archeological survey is conducted. Archeological investigations will be conducted to identify and evaluate archeological sites, assess the effects of the proposed undertaking on NRHPeligible archeological sites, and develop means to minimize and mitigate any adverse effects of the project on NRHP-eligible archeological sites that cannot be avoided.
- 4. NeighborWorks Great Falls shall apply the NRHP Criteria for Evaluation (36 CFR part 63), in consultation with the MT SHPO, appropriate Indian Tribes, and other interested parties, to evaluate the NRHP eligibility of identified archeological sites, in accordance with applicable standards and guidelines in Stipulation II.
- 5. NeighborWorks Great Falls shall consult with the MT SHPO, appropriate Indian Tribes, and other interested parties, regarding evaluation of adverse effects on archeological resources identified as eligible for the NRHP, and to develop and evaluate alternatives or modifications to the undertaking that could avoid or minimize adverse effects on NRHP-eligible archeological sites. If adverse effects to NRHP- eligible archeological sites cannot be avoided, RHS shall resolve the adverse effects through the implementation of an Archeological Data Recovery Plan(s) developed in accordance with the applicable standards and guidelines in Stipulation II.
- 6. The Signatories recognize that any human remains or funerary objects that may be discovered during data recovery operations are subject to both Montana Burial Law and the NAGPRA. Post-review discoveries shall be handled as outlined in Stipulation VII.
- 7. NeighborWorks Great Falls shall ensure that procedures to be used for the processing, analysis, and curation of collected materials must be in accordance with the applicable standards and guidelines in Stipulation II, and currently accepted standards for the analysis and curation of archaeological remains.

B. Research and Recordation

RHS will coordinate with NeighborWorks Great Falls to ensure fulfillment of research and recordation stipulations to compensate for the adverse impact to the historically significant lower portage section of the Lewis and Clark National Historic Landmark and the Lewis and Clark National Historic Trail.

 RHS will coordinate with NeighborWorks Great Falls to ensure they contract with professionals meeting II.B. standards and having any special equipment that NPS specifies to conduct Historic American Landscape Survey (HALS) documentation of the landscape within the direct APE. The documentation will be prepared in accordance with NPS's specifications dated on , 2024 and attached to this document as Appendix

- a. Prior to the construction, NeighborWorks Great Falls will document landscape characteristics as specified by the standards outlined in NPS guidance documents: *Historic American Landscapes Survey Guidelines for Historic Reports* and the NPS-prepared SOD. The submittal will include written, graphic, and photographic documentation and measured drawings packaged and submitted as per the SOD included as Attachment to this MOA.
- b. Copies of the documentation will be provided to the consulting parties, except for the ACHP, and to the following repositories: the MT SHPO; and the National Park Service/Library of Congress.
- C. RHS will coordinate with NeighborWorks Great Falls to ensure they complete the HALS documentation prior to initiation of construction within the direct APE.

C. Public Interpretation

RHS will coordinate with NeighborWorks Great Falls to ensure the following public interpretation measures are implemented to share the results of Stipulation IV.B and the unique stories of the Lewis and Clark National Historic Landmark- Great Falls Portage and national Historic Trail with the public.

- **1**. list topics interpretation would cover;
- **2.** a range of how many signs, One large enough panel could cover multiple subjects and feature QR codes to further information;
- 3. If QR codes, to what website? An established, maintained site is preferable.
- 4. Describe generally where would any signs be installed, i.e. in conjunction with views, or paths
- 5.
- 6.
- D. Positive Preservation Measures
 - 1.
 - 2.

V. POST-REVIEW DISCOVERIES

If during the course of any ground disturbance related to any portion of the Project, any post review discovery, including but not limited to, any artifacts, foundations, or other indications of past human occupation of the area are uncovered, NeighborWorks Great Falls shall ensure protection by complying with 36 CFR § 800.13(b)(3) and (c). All Work, including vehicular traffic, shall immediately stop within a 50 ft. radius around the area of discovery. The Contractor shall ensure barriers are established to protect the area of discovery and notify NeighborWorks Great Falls and their Engineer, and/or Architect, if any, to contact the appropriate RD personnel. NeighborWorks Great Falls shall engage a Secretary of the Interior (SOI) qualified professional archeologist to quickly assess the nature and scope of the discovery; implement interim measures to protect the discovery from looting and vandalism; and establish broader barriers if further historic and/or precontact properties, can reasonably be expected to occur. NeighborWorks Great Falls shall notify RHS, MT SHPO, and all Federally recognized Indian tribe(s) that may have an interest in the area of discovery. The MT SHPO may require additional tribes who may have an interest in the area of discovery also be contacted. The notification shall include an assessment of the discovery provided by the SOI-qualified professional archeologist.

When the discovery contains burial sites or human remains, NeighborWorks Great Falls and its contractors shall also immediately notify the appropriate law enforcement authorities, Contact from on-site personnel should be made to reduce delay times, in accordance with tribal, state, or local laws including 36 CFR Part 800.13; 43 CFR Part 10, Subpart B; and the ACHP's current Policy Statement Regarding treatment of Burial Sites, Human Remains, or Funerary Objects.

When the discovery contains burial sites or human remains, all construction activities, including vehicular traffic shall stop within a 100 ft. radius of the discovery and barriers shall be established. The evaluation of human remains shall be conducted at the site of discovery by a SOI-qualified professional. Remains that have been removed from their primary context and where that context may be in question may be retained in a secure location, pending further decisions on treatment and disposition. RD may expand this radius based on the SOI professional's assessment of the discovery and establish broader barriers if further subsurface burial sites, or human remains can reasonably be expected to occur. RD, in consultation with the MT SHPO and interested tribes shall develop a plan for the treatment of native human remains.

Work may continue in other areas of the undertaking where no historic properties, burial sites, or human remains are present. If the inadvertent discovery appears to be a consequence of illegal activity such as looting, the onsite personnel shall contact the appropriate legal authorities immediately if the landowner has not already done so.

Work may not resume in the area of the discovery until a notice to proceed has been issued by RD. RD shall not issue the notice to proceed until it has determined that the appropriate local protocols and consulting parties have been consulted.

VI. MONITORING AND REPORTING

Every year, within 90 days of the anniversary date of execution of this MOA, NeighborWorks Great Falls shall provide to all Signatories a written report regarding the actions taken to fulfill the terms of the agreement. RHS shall file a copy with the ACHP per 36 CFR § 800.6(b)(iv). Such report shall include status updates on demolition and mitigation activities, summary of ongoing master planning efforts as relevant, any scheduling changes proposed, any problems encountered, and any disputes and objections received in efforts to carry out the terms of this MOA. Such reporting shall cease when the terms of the MOA have been fulfilled or upon agreement of the Signatories.

VII. DISPUTE RESOLUTION

Should any Signatory to this MOA object at any time to any actions proposed or to the way the terms of the MOA are implemented, RHS shall consult with such party to resolve the objection. If RHS determines that such objection cannot be resolved, RHS will:

- A. Forward all documentation relevant to the dispute, including RHS's proposed resolution, to the ACHP. The ACHP shall provide RHS with its advice on the resolution of the objection within 30 calendar days of receiving adequate documentation. Prior to reaching a final decision on the dispute, RHS shall prepare a written response that considers any timely advice or comments regarding the dispute received from the ACHP or other Signatories and provide them with a copy of the written response. RHS will then proceed with its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within 30 calendar days of receiving the information from RHS, RHS may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, RHS shall prepare a written response that considers any timely comments regarding the dispute received from the Signatories to the MOA and provide them and the ACHP with a copy of the written response.
- C. RHS's responsibility to carry out all other actions subject to the terms of the MOA that are not the subject of the dispute remain unchanged.

VIII. AMENDMENTS

This MOA may be amended when such an amendment is agreed to in writing by all Signatories. The amendment will be effective on the date a copy signed by all the Signatories is filed with the ACHP.

IX. TERMINATION

If any Signatory to this MOA determines that its terms will not or cannot be carried out, that Signatory will immediately consult with the other Signatories to develop an amendment per Stipulation VIII above. If within 30 calendar days (or another time agreed to by all Signatories) an amendment cannot be reached, any Signatory may terminate the MOA upon written notification to the other Signatories.

Once the MOA is terminated, and prior to work continuing associated with the development of the subject property, RHS must either (a) execute another MOA pursuant to 36 CFR § 800.6 or (b) request, consider, and respond to the comments of the ACHP under 36 CFR § 800.7. RHS will notify the Signatories as to the course of action it will pursue.

X. EFFECTIVE DATE AND DURATION

This MOA shall be effective on the date the last Signatory has affixed their signature. The MOA will expire if its terms are not carried out within 5 years from the date of its execution. Prior to such time, the Signatories may consult to reconsider the terms of the MOA and amend it in accordance with Stipulation VIII above.

XI. SIGNATURES

The Signatories agree to execute this MOA in counterparts with a separate signature page for each Signatory. The exchange of copies of this MOA and of signature pages by facsimile or by electronic transmission shall constitute effective execution and delivery of this MOA to the parties and may be used in lieu of the original MOA for all purposes. Signatures of the parties transmitted by facsimile or electronic transmission shall be deemed to be their original signatures for all purposes.

XII. GENERAL PROVISIONS

- A. Each Signatory will manage and complete their own activities and utilize their own resources, including the expenditure of their own funds, in pursuing these objectives. Each Signatory will carry out its separate activities in a coordinated and mutually beneficial manner.
- **B.** Any transfer of funds from one Signatory to another shall be done via a separate instrument as appropriate.

EXECUTION of this MOA by the RHS, MT SHPO, National Park Service, and ACHP and implementation of its terms evidence that RHS has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

REGARDING THE NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT, GREAT FALLS, MONTANA

SIGNATORY 1 of 4

Advisory Council on Historic Preservation

Date

Reid Nelson Executive Director

REGARDING THE NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT, GREAT FALLS, MONTANA

SIGNATORY 2 of 4

Rural Housing Service

Date

Rob Nelson Assistant Director, Program Support Services USDA Rural Development

REGARDING THE NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT, GREAT FALLS, MONTANA

SIGNATORY 3 of 4

Montana State Historic Preservation Officer

Pete Brown, State Historic Preservation Officer

_____ Date

REGARDING THE NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUALSELF HELP HOUSING CONSTRUCTION DEVELOPMENT, GREAT FALLS, MONTANA

SIGNATORY 4 of 4

National Park Service

_____ Date

[insert name and title]

REGARDING THE NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT, GREAT FALLS, MONTANA

INVITED SIGNATORY:

NeighborWorks Great Falls

Date

[insert name and title]

REGARDING THE NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT, GREAT FALLS, MONTANA

CONCURRING PARTY 1 of ____: [insert name of concurring Party]

Date

[insert name and title]