

**Great Falls – Cascade County Historic Preservation Advisory Commission  
Minutes from the June 10, 2024 meeting, held in the PCD Conference Room at the Civic Center**

**Members Present:** Channing Hartelius, Stephanie Erdmann, Ken Sievert, Suzanne Waring, Ken Robison, David Erdmann, Jeanne Price

**Members Absent:** Megan Sanford, Chris Christiaens

**Staff Present:** Samantha Long

**Ex-Officio Members Present:** Joe McKenney, Rae Grulkowski

**The meeting was called to order by Channing Hartelius at 12:00 PM.**

**1. Welcome New HPAC Members**

- The four new members of HPAC were welcomed, and introductions were made around the table.

**2. Approval of Meeting Minutes – May 8, 2024**

- Stephanie Erdmann, David Erdmann, and Jeanne Price abstained, as they were not present at that meeting.
- Ken Robison moved to approve the minutes as written. Ken Sievert seconded, and the motion carried.

**3. Approval of Meeting Minutes – May 11, 2024**

- Stephanie Erdmann, David Erdmann, and Jeanne Price abstained, as they were not present at that meeting.
- Ken Robison noted that Stephanie and David Erdmann were recommended to the County Commission's vacancy, not the City's.
- Ken Robison moved to approve the minutes as written. Ken Sievert seconded, and the motion carried.

**4. HPO Report**

- Sam reported she has had a lot of positive feedback about the joint Preservation/Legacy Awards. Attendance was about 75 people, which is much higher than in recent years. Sam asked if HPAC had any initial thoughts.
  - Channing praised the event and said it was a success.
  - Ken R. said it had been fun but that he would like to see the event be less of an award ceremony and more of a reception to recognize preservation.
  - Joe McKenney suggested that attendance might be better on a weeknight, as the event has been in the past.
- The remodel of the Missouri Room of the Civic Center into municipal courtrooms is underway.
- At the last meeting the Commission had asked Sam to put the Rocky Mountain Building on the June agenda for discussion. Sam was able to secure a visit from the City's Building Official to talk about possible future directions from the City's perspective, but he had a conflict today. After consulting with Channing, Sam pushed that discussion out to the next regular meeting in August.
- Sam will be on vacation June 14-25

**5. Highland Development/Portage NHL Section 106 Report**

- Sam gave a brief overview of the Great Falls Portage National Historic Landmark and the proposed Highland Development which will affect it. Since the project will use Federal funds, the developer must avoid or mitigate adverse impacts to cultural resources. Sam introduced

the second draft of the Memorandum of Agreement which will outline the agreement between the developer, the Advisory Council on Historic Preservation, the National Park Service, and the US Department of Housing and Urban Development. She asked if HPAC had any comments as a consulting party. After some deliberation, the Commission agreed they would like some more time to study the details of the project, and would like to arrange a site visit.

- Ken Robison moved to hold a meeting in July to discuss the Highland Development, meeting at Noon at the Portage Overlook and then proceeding to the Civic Center for discussion. Jeanne Price seconded, and the motion carried.

#### **6. Boston and Montana Barn Report**

- Sam briefly summarized the history of this project for the new members. She reported that she has arranged a meeting with Park & Rec in early July, and would invite Rich Ecke to attend as he remains on the Barn Committee.

#### **7. Vinegar Jones Cabin Committee Report**

- Ken Sievert and Sam are working with the City to recoat the roof as soon as is practical.
- Ken Robison reported that HPAC and volunteers had gathered to clean the cabin and ready it for the summer. Since Warren is not able to open the cabin in the evening this summer, he has organized a sign-up sheet for HPAC members to volunteer.

#### **8. Vote to Cancel July Meeting**

- As noted above, HPAC will have a July meeting.

#### **9. Reports from Commissioners**

- Ken Robison reported the following
  - Gar Wood, respected local archaeologist most recently based in Fort Benton, passed recently.
  - The Fort Shaw Basketball reunion on the 20<sup>th</sup> anniversary of the monument installation was well attended and included a trip to visit the pharmacy in Fort Benton, where the team played games on the second floor
  - Work on the restoration of the Keelboat Mandan continues and there will be opportunities to volunteer this summer
  - The MT History conference is upcoming September 26-28, and HPAC is well represented in the tour schedule
  - Ellen Baumler, prolific Montana historian, passed last winter and a celebration of life will be held on July 8 in the State Capitol Rotunda
- Suzanne and Channing will be leading a tour of the Northside Residential Historic District on July 23<sup>rd</sup> at 5:30
- Channing reported that Bev Caldwell has produced a booklet on the history of Cascade and Mary Fields and it is being sold as a fundraiser for the plaque honoring Fields – contact Channing for details.

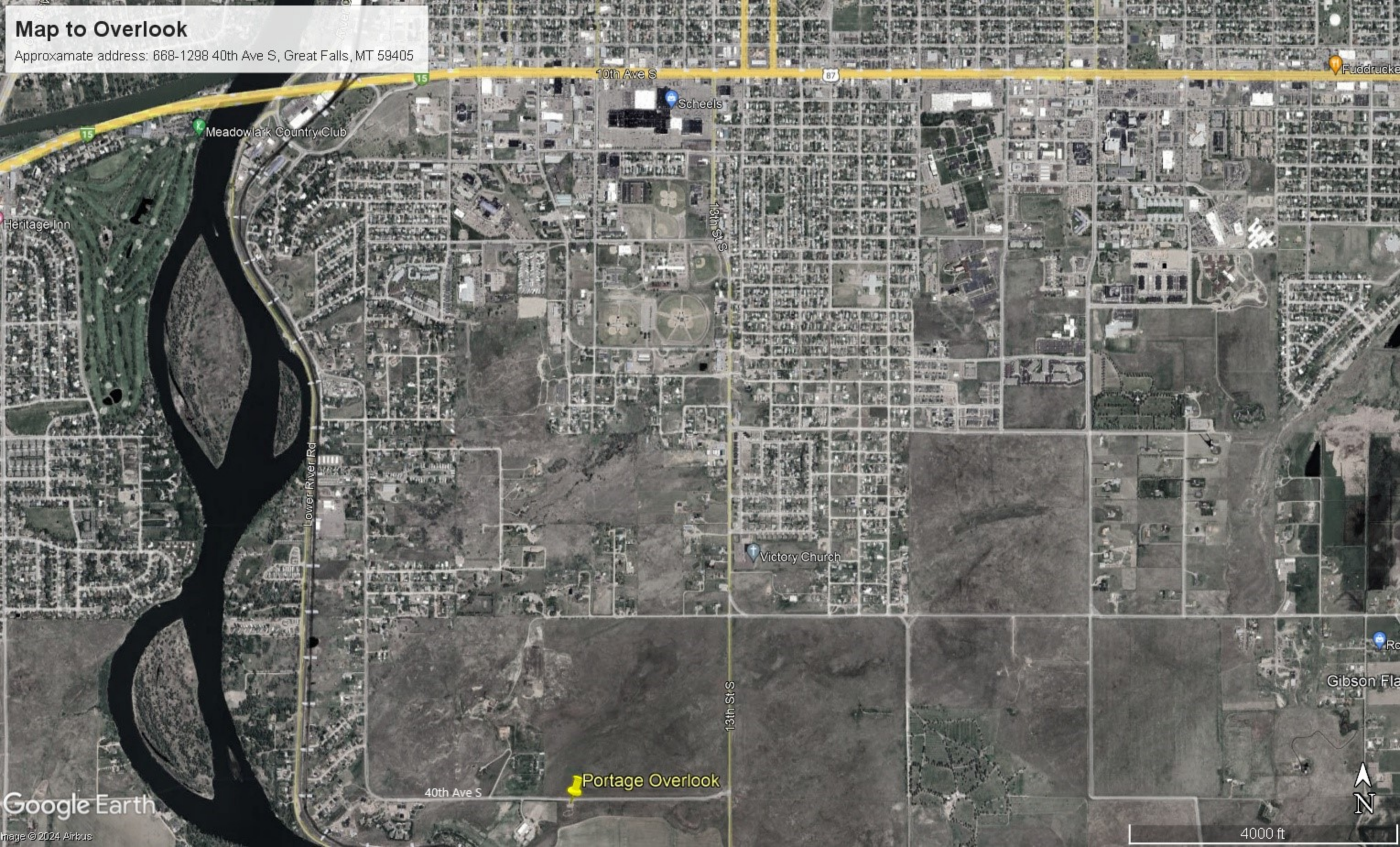
#### **10. Public Comment**

- There was no public comment.

**Channing Hartelius adjourned the meeting at 1:16 P.M.**

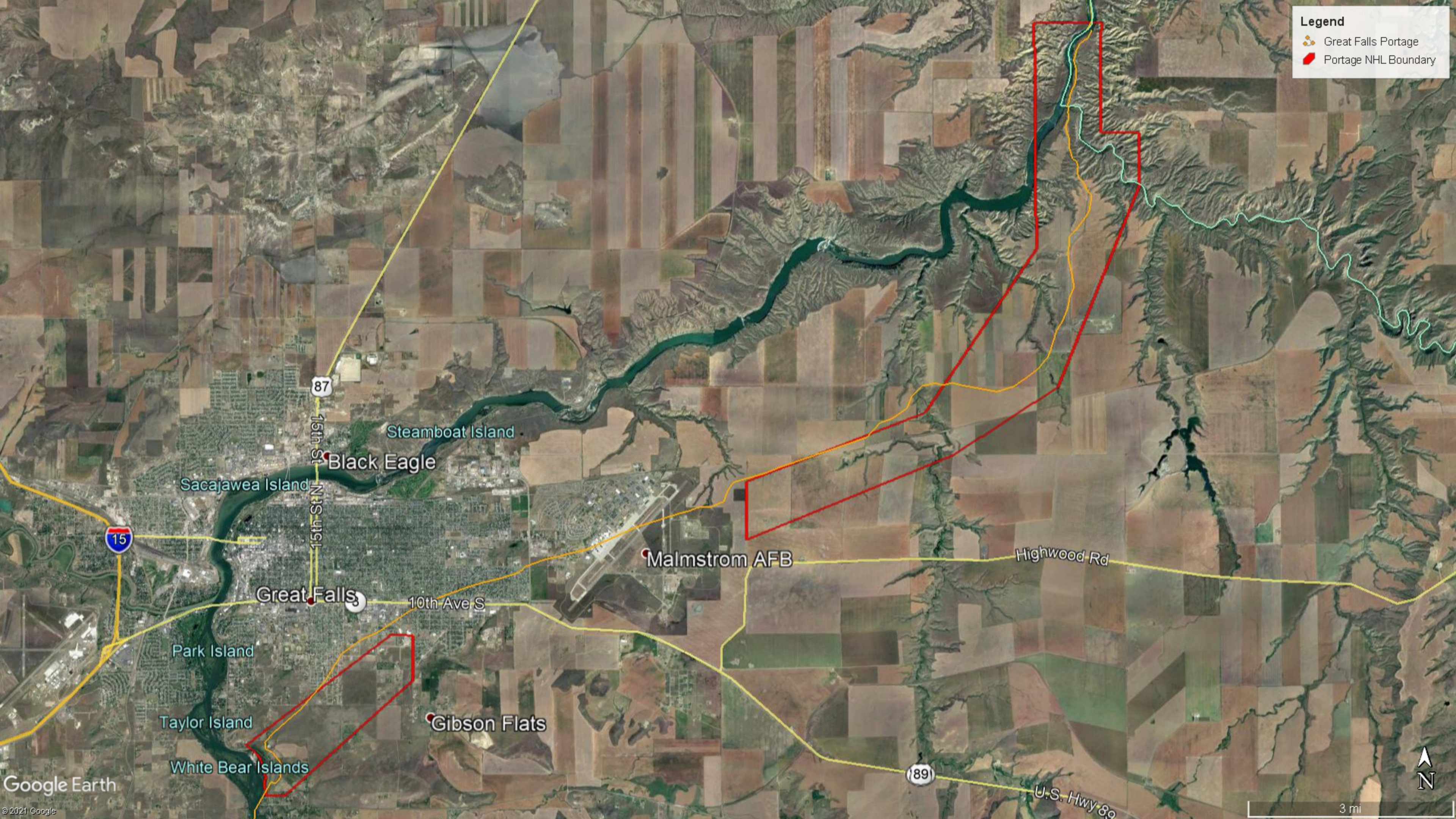
# Map to Overlook

Approximate address: 668-1298 40th Ave S, Great Falls, MT 59405

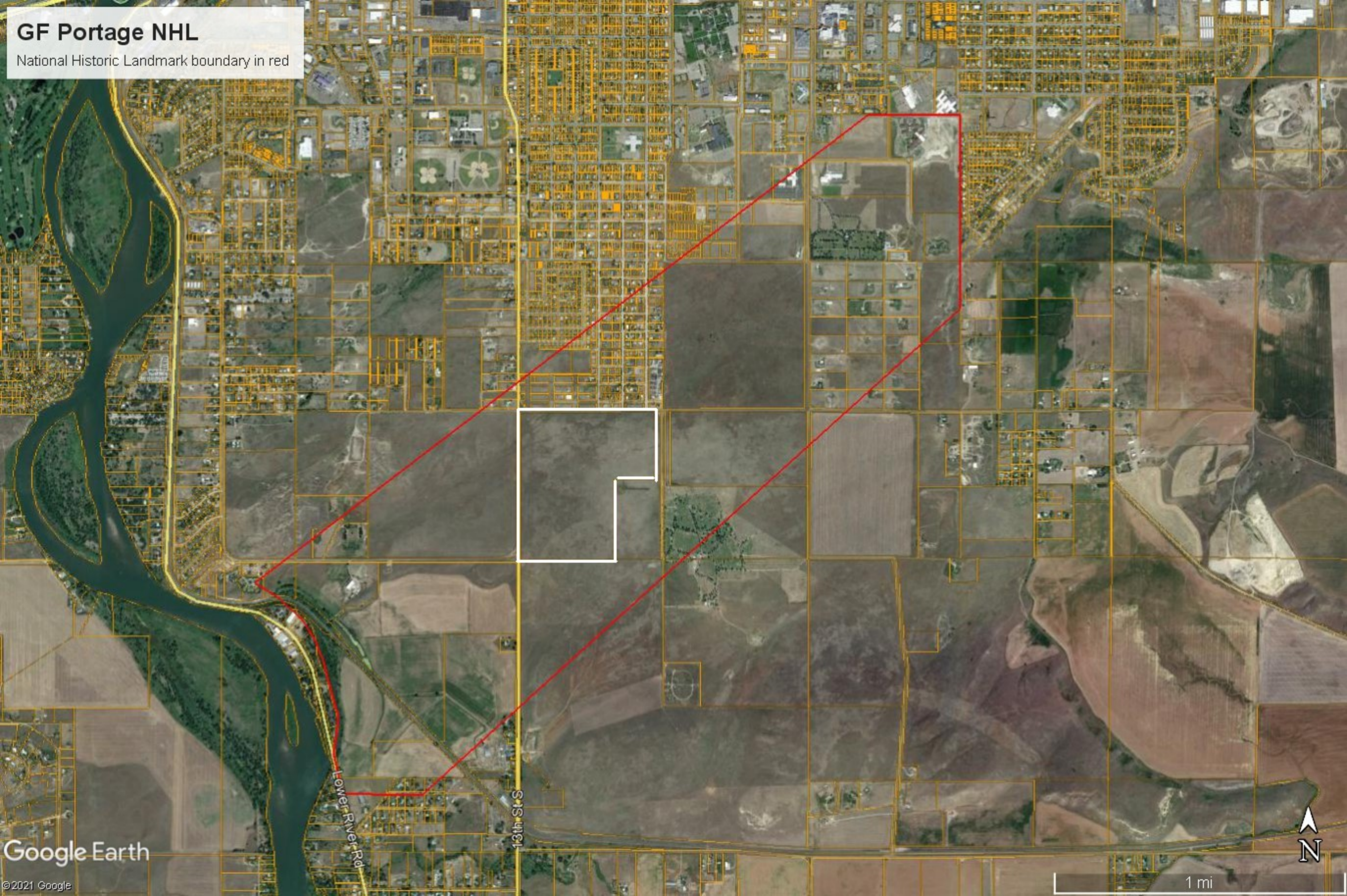


**Legend**

- Great Falls Portage
- Portage NHL Boundary



**GF Portage NHL**  
National Historic Landmark boundary in red



Lower River Rd

13th St S



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Heritage Conservation and Recreation Service

National Register of Historic Places  
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See instructions in *How to Complete National Register Forms*  
Type all entries—complete applicable sections

1. Name

historic GREAT FALLS PORTAGE NATIONAL HISTORIC LANDMARK  
and/or common

2. Location

street & number \_\_\_\_\_ not for publication  
city, town Great Falls \_\_\_\_\_ vicinity of \_\_\_\_\_ congressional district Second  
state Montana code 30 county Cascade code 013

3. Classification

<b>Category</b>	<b>Ownership</b>	<b>Status</b>	<b>Present Use</b>
<input checked="" type="checkbox"/> district	<input type="checkbox"/> public	<input checked="" type="checkbox"/> occupied	<input checked="" type="checkbox"/> agriculture
<input type="checkbox"/> building(s)	<input type="checkbox"/> private	<input checked="" type="checkbox"/> unoccupied	<input type="checkbox"/> commercial
<input type="checkbox"/> structure	<input checked="" type="checkbox"/> both	<input type="checkbox"/> work in progress	<input type="checkbox"/> educational
<input type="checkbox"/> site	<b>Public Acquisition</b>	<b>Accessible</b>	<input type="checkbox"/> entertainment
<input type="checkbox"/> object	<input type="checkbox"/> in process	<input checked="" type="checkbox"/> yes: restricted	<input type="checkbox"/> government
	<input type="checkbox"/> being considered	<input type="checkbox"/> yes: unrestricted	<input type="checkbox"/> industrial
		<input type="checkbox"/> no	<input type="checkbox"/> military
			<input type="checkbox"/> museum
			<input checked="" type="checkbox"/> park
			<input checked="" type="checkbox"/> private residence
			<input type="checkbox"/> religious
			<input type="checkbox"/> scientific
			<input type="checkbox"/> transportation
			<input checked="" type="checkbox"/> other: cemetery

4. Owner of Property

name Office of the Mayor/ State Department of Fish and Game/multiple private and  
public ownership  
street & number \_\_\_\_\_  
city, town \_\_\_\_\_ vicinity of \_\_\_\_\_ state \_\_\_\_\_

5. Location of Legal Description

courthouse, registry of deeds, etc. Cascade County Courthouse  
street & number \_\_\_\_\_  
city, town Great Falls, state Montana

6. Representation in Existing Surveys

title NONE has this property been determined eligible? \_\_\_\_\_ yes \_\_\_\_\_ no  
date \_\_\_\_\_ federal \_\_\_\_\_ state \_\_\_\_\_ county \_\_\_\_\_ local  
depository for survey records \_\_\_\_\_  
city, town \_\_\_\_\_ state \_\_\_\_\_

## 7. Description

### Condition

excellent  
 good  
 fair

deteriorated  
 ruins  
 unexposed

### Check one

unaltered  
 altered

### Check one

original site  
 moved      date \_\_\_\_\_

### Describe the present and original (if known) physical appearance

Lewis and Clark were probably the first white men to view the Great Falls of the Missouri, the fourteen-mile stretch of falls and rapids where the river drops 520 feet over five great rock shelves and the river channel rushes between 200 foot high canyon-like walls. The natural spectacle of the falls has been ruined--radically altered by modern settlement. Giant hydroelectric operations now dam the river and expose the massive rock cliffs that were once unseen behind torrents of white water.

Today the magnificent Great Falls of the Missouri have been harnessed for hydroelectric power, only a small volume of water falls over the great rockshelves which are largely exposed, and a city has grown up around the falls.

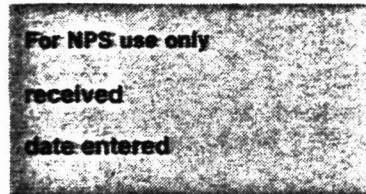
Snow-topped mountains rim this wide upland plain in all directions except north. To the east are the Highwood Mountains, to the southeast the Little Belt Mountains, to the south the Big Belts, and in the west and southwest the distant peaks of the Sawtooth Range. Geographically, the Great Falls signal the beginning of the Rocky Mountains on the Lewis and Clark route westward.

The integrity of the historic 18-mile stretch varies from natural, undisturbed, remote areas, to those completely altered by modern development. The Great Falls Portage National Historic Landmark consists of two discontinuous sections of the trail which remain largely as Lewis and Clark would have known them. These areas encompass the lower campsite, where the boats were taken out of the water and preparations for the overland trek begun, and the upper campsite, where the expedition assembled Lewis' experimental boat and resumed its exploration of the Missouri River.

No evidence of the portage route is discernible today, but documentary and cartographic research, combined with study of the local terrain by several groups, has resulted in the delineation of the approximate route as seen on the map entitled "The Great Falls Portage of Lewis and Clark 1805-1806", and the four 1965 USGS 7.5' series maps enclosed. The research and field assessment of Robert Bergantino, Butte, Montana, is used in the establishment of Clark's survey route and the expedition's portage route. By studying contemporary maps and the expedition journals, and the terrain of the route, the two routes have been charted with a relatively high degree of confidence.

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Following the instructions of President Jefferson, Clark scouted and plotted the "survey route" -- a contribution to Clark's map of the unexplored Northwest, and the ideal route if terrain and equipment had not been a factor. It was not a route necessarily to be followed, since the coulees dictated a less direct but more practical route over higher ground -- the "canoe route". (Please refer to the Portage map, as well as the two routes marked on the USGS maps). The expedition's lower and upper campsites and other historic features are marked.

The Lower Portage Camp (marked with a circle on USGS Morony Dam Quadrangle) was located approximately one mile downstream (north) from the mouth of Portage (now Belt) Creek, on the east bank of the Missouri River. About one and one-quarter miles below Morony Dam, and free of major intrusions, the vista from Belt Creek downriver is still one of undisturbed natural riverway. The undammed river rushes over rapids and through a channel lined with bluffs and canyons, surrounded by treeless grazing land, covered with prickly pear cactus and high grass.

The area is used only for grazing and the sole man-made features visible from the cliffs above Belt Creek are a group of small ranch structures on the west side of the river and a few fence lines to restrain grazing animals. The lower portage campsite is extremely remote and accessible only by four wheel drive vehicle and by foot.

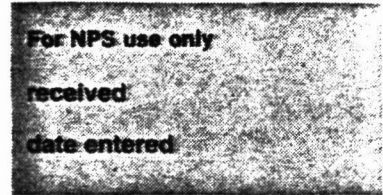
From the lower portage campsite, the party towed the canoes up the Missouri River, then up the present Belt Creek which is lined with steep gorge-like cliffs. On the east bank, near the mouth of Belt Creek, is a small grove of cottonwood trees, probably used by Lewis and Clark to construct their wagons for the portage.

The Sulphur Spring, whose water is credited with saving the life of the critically-ill Sacagawea, is located opposite the mouth of Belt Creek, about three hundred yards from the west bank of the Missouri River, on a sloping grass shelf (labeled on the USGS map). The spring itself is about thirty feet in diameter, and the stream which flows from it drops over a high rock shelf, in a waterfall, into the Missouri River. Sulphur Spring is remotely located in the well-preserved east section of the route, and is privately owned. Access to it is very difficult, but its waterfall and stream can be seen easily from the opposite side of the river. Sulphur Spring is included inside the boundary drawn around the lower portage route area.



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The Montana Power Company owns the land on both sides of Portage Creek for about 1,000 feet upstream from its mouth. The rest is privately owned ranch land, although there is no developed activity other than livestock grazing in the immediate vicinity.

About one mile up Portage (Belt) Creek, the expedition hand-carried the canoes up the treacherously steep cliffs. After ascending these steep walls, the men traced the most feasible southwesterly route across several creeks and ravines. As seen on the USGS maps, the canoe route led across the natural crossing points over several small drainages, hilly terrain, and Willow (now Box Elder) Creek.

The approximately eight-mile stretch from Portage (Belt) Creek to Clark's fourth survey point at the "head of a drane which falls into the Missouri at the 19 feet or crooked fall" (now the eastern limits of Malstrom Air Force Base) is privately owned and used almost exclusively for wheat farming, with only a few scattered farm structures. Near the north end of the portage, a county highway runs north and south along a township section line and then northeasterly to the farms in the Belt Creek area, crossing the canoe route several times. Just west of the point where the portage route crosses Willow (Box Elder) Creek and the former trackbed of the Chicago, Milwaukee, St. Paul, and Pacific Railroad line, the route turns more westerly.

The next 4.8-mile section of the expedition's survey and canoe portage route is not included in the National Historic Landmark designation due to its loss of historic integrity. The two routes cross the outer ends of the runways at Malstrom Air Force Base, south of the major complex of buildings, though marked by lights, towers, and small airport utility buildings. Southwest of the air base, the route crosses two forks of the major four-lane highway, Route 87/89, then proceeds southwesterly through an area of recent housing and commercial development, which bears no resemblance to the open land seen by members of the expedition in 1805.

The second of the two discontinuous designated areas begins on the east side of Mount Olivet Cemetery and continues approximately two and one-half miles over gently sloping land to the White Bear Island upper portage campsite. While not of the historically significant period, and therefore a non-contributing element, the Mount Olivet Cemetery, elevation 3,500 feet, is one of the highest points of land on the expedition's portage route. The cemetery is located in a grove of trees which protects the natural character of the vista,

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and from its own high vantage point, the last section of the portage trail can be seen largely as Lewis and Clark observed it. The final section of the trail leading to the Missouri River is open farmland, with some farm structures and a few roads crossing the land. A non-contributing element located on the canoe portage route is a small tract of new housing which, nevertheless, is minimized by the vastness of the terrain.

The Upper Portage Campsite, located on the east bank of the Missouri River, south of the mouth of the Sun River, has changed considerably since the time of the expedition. The Missouri River has experienced a build-up of silt in this area, and the river's ox-bow is becoming less pronounced. Both factors have contributed to the obliteration of the three distinct White Bear Islands noted by Lewis and Clark.

The expedition camped in an area on the east riverbank opposite a group of three islands they named for the unusually large number of grizzly bears there. The westernmost island has become a part of the west riverbank, and that low lying area is still covered with heavy growth of cottonwood, willow, and brush.

The middle island has become more prominent, and has lost its historic integrity by the intrusion of modern structures and the paved, two-lane River Drive (Route 226) which runs the length of the island. The easternmost island has all but joined the east riverbank.

The canoe portage route followed the original east bank of the Missouri River to the upper portage campsite. The site of the camp now lies farther from the riverfront than it did originally, due to the changing watercourse and siltation. The expedition camped just to the east of what is now Route 226, below the southern tip of the middle island on the east riverbank. The presumed campsite remains open land, privately owned. Although some development is taking place around the area where the expedition camped, cached supplies, and resumed their river trek, the campsite area itself is undeveloped.

# 8. Significance

Period	Areas of Significance—Check and justify below			
<input type="checkbox"/> prehistoric	<input type="checkbox"/> archeology-prehistoric	<input type="checkbox"/> community planning	<input type="checkbox"/> landscape architecture	<input type="checkbox"/> religion
<input type="checkbox"/> 1400–1499	<input type="checkbox"/> archeology-historic	<input type="checkbox"/> conservation	<input type="checkbox"/> law	<input type="checkbox"/> science
<input type="checkbox"/> 1500–1599	<input type="checkbox"/> agriculture	<input type="checkbox"/> economics	<input type="checkbox"/> literature	<input type="checkbox"/> sculpture
<input type="checkbox"/> 1600–1699	<input type="checkbox"/> architecture	<input type="checkbox"/> education	<input type="checkbox"/> military	<input type="checkbox"/> social/ humanitarian
<input type="checkbox"/> 1700–1799	<input type="checkbox"/> art	<input checked="" type="checkbox"/> engineering	<input type="checkbox"/> music	<input type="checkbox"/> theater
<input checked="" type="checkbox"/> 1800–1899	<input type="checkbox"/> commerce	<input checked="" type="checkbox"/> exploration/settlement	<input type="checkbox"/> philosophy	<input type="checkbox"/> transportation
<input type="checkbox"/> 1900–	<input type="checkbox"/> communications	<input type="checkbox"/> industry	<input type="checkbox"/> politics/government	<input type="checkbox"/> other (specify)
		<input type="checkbox"/> invention		

<b>Specific dates</b>	June 13, 1805– July 13, 1805	<b>Builder/Architect</b>	N/A
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**Statement of Significance (in one paragraph)**

The month of labor and adventures experienced by the Lewis and Clark expedition in completing their portage around the Great Falls of the Missouri River presented a challenge to the explorers exceeded only by the obstacles encountered in their crossing of the Bitterroot Mountains. During the portage, which lasted thirty-one days, all the equipment and supplies, including canoes, had to be carried across an overland route of approximately 18 miles either by hand or in makeshift wagons around the 21-mile unnavigable stretch of falls and rapids. The time spent in covering this relatively short distance was critical, since the expedition needed sufficient time to cross the Rocky Mountains to the west before the onset of winter.

HISTORY

On June 13, while attempting to ascertain whether they were following the true course of the Missouri River, Meriwether Lewis and a small advance party travelling overland were the first known white men to see the Great Falls of the Missouri River. The Minitari (Hidatsa) Indians had described these falls to the expedition during its winter stay at Fort Mandan. From several miles away Lewis first heard the roar of the huge falls and that day and the next he explored the falls and rapids all the way to the Medicine (now the Sun) River.

Lewis recorded his impression of the falls:

I hurried down the hill which was about 200 feet high and difficult of access, to gaze on this sublimely grand spectacle. I took my position on the top of some rocks about 20 feet high opposite the center of the falls . . . from the reflection of the sun on the spray or mist which arrises from these falls there is a beautiful rainbow produced which adds not a little to the beauty of this majestically grand scenery.

(Lewis, 13 June 1805)

From the Indians' description of the Great Falls, Lewis and Clark anticipated a short detour by land around a single set of falls. Rather, the necessity of a longer portage became apparent as Lewis discovered further falls and rapids upriver. On June 16, Lewis sent a messenger back to Clark and the main party camped on the west bank of the Missouri below the future lower portage camp,

# 9. Major Bibliographical References

See continuation sheet.

# 10. Geographical Data

Acreeage of nominated property 7700 acres

Quadrangle name 7.5' series, revised 1975: Morony Dam, Mont.; Northeast Great Falls, Mont.; Southwest Great Falls, Mont. Quadrangle scale 1:24,000

UMT References

(see continuation sheet)  
A 

Zone	Easting			Northing					

B 

Zone	Easting			Northing					

C 

Zone	Easting			Northing					

D 

Zone	Easting			Northing					

E 

Zone	Easting			Northing					

F 

Zone	Easting			Northing					

G 

Zone	Easting			Northing					

H 

Zone	Easting			Northing					

## Verbal boundary description and justification

See continuation sheet

## List all states and counties for properties overlapping state or county boundaries

state Montana code 30 county Chouteau code 015

state code county code

# 11. Form Prepared By

name/title Blanche Higgins Schroer, (Roy E. revised, Nancy Witherell, Historian, 8/84

organization Historic Sites Survey National Park Service date National Park Service-Rocky Mountain Region

street & number 1100 L Street, NW telephone 655 Parfet Street Denver, CO 80225

city or town Washington, DC 20240 state (303)234-2560

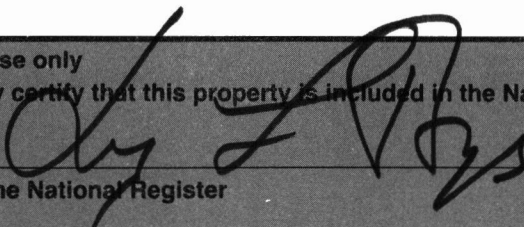
# 12. State Historic Preservation Officer Certification

The evaluated significance of this property within the state is:

national  state  local

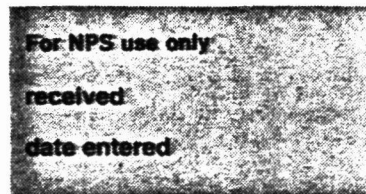
As the designated State Historic Preservation Officer for the National Historic Preservation Act of 1966 (Public Law 89-665), I hereby nominate this property for inclusion in the National Register and certify that it has been evaluated according to the criteria and procedures set forth by the Heritage Conservation and Recreation Service.

State Historic Preservation Officer signature

title	date
For HCRS use only I hereby certify that this property is included in the National Register	
	date <u>6/17/85</u>
Keeper of the National Register	
Attest:	date
Chief of Registration	

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reporting discovery of the falls and arranging to meet and camp at the lower end where the portage would begin. The campsite was especially good because of the driftwood that collected there, providing them with fuel in those treeless plains. On the 14th, while exploring the area, Lewis recorded having several dangerous encounters involving a grizzly bear, a mountain cat or wolverene, and three buffalo bulls.

Clark and the main party arrived and set up camp at the lower end of the falls on June 16, at what was to be known as the lower portage camp, and rejoined Lewis and his group that same day. At the camp, Sacagawea, who had been seriously ill for more than a week from some unknown malady, was given water from the Sulphur Spring located opposite Portage Creek (Belt Creek). The water apparently cured her sickness, which had been unaffected by Clark's various treatments.

June 16, the canoes were unloaded and moved over rapids and rocks up the Missouri and then about one and one-quarter mile up Belt Creek to the place where they could best be hand-carried up the high bluffs to the plain above. June 17, Clark went ahead to plot and map the survey route. Lewis directed preparations for the portage.

The large white pirogue was unloaded and hidden with some supplies in a willow grove, to be reclaimed on the return trip. To replace the pirogue, the group prepared for assembly Lewis' favorite project, the "Experiment", an iron-framed boat manufactured at Harper's Ferry, West Virginia, and brought all the way from Pittsburgh for use on the upper Missouri River. To transport the canoes and baggage, two simple wagons were constructed, using 22-inch-diameter wooden discs crosscut from a large cottonwood tree for the wheels, the mast of the white pirogue for axles, and improvised parts made with what little timber was available.

June 17 to June 23, Clark and five men mapped out and marked with stakes a survey route lying on the south side of the 21-mile stretch of river. They also established the upper portage camp. The supplies were moved to the top of the hill above the canoes on June 21. The traverse of the the entire remaining portage route took place on June 22.

Equipment was hand-carried about three miles from the lower camp to the top of the high plain. The heavy canoes, built of cottonwood trees, were also carried about three-quarters of a mile to the top of the high plains, uphill from the bank of Portage (Belt) Creek. Some equipment was hand-carried the entire route.

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The crude wagons required constant repair as the men dragged them across the rough terrain, around ravines and hills and across creeks. The summer heat beat down mercilessly, the prickly pear cactus cut the men's feet through their moccasins, and progress was very slow as the group verged on collapse from exhaustion. Lewis wrote:

They are obliged to halt and rest frequently for a few minutes, at every halt these poor fellows tumble down and are so much fatigued that many of them are asleep in an instant; in short their fatigues are incredible; some are limping from the soreness of their feet, others faint and unable to stand for a few minutes, with heat and fatigue, yet no one complains, all go with cheerfulness.  
(Lewis, 23 June 1805)

June 29, after an extremely hot day, a violent storm struck with torrents of rain and huge hail stones which actually knocked down and injured several men. Clark, Charbonneau, Sacagawea and her baby were caught by the deluge in a gully and nearly drowned. The expedition was constantly alert for the exceptional number of grizzly bears and rattlesnakes, and was also plagued by swarms of mosquitoes. Game of all kinds was plentiful, and the men stocked up on food and leather clothing. On June 30, Clark estimated he saw 10,000 buffalo on the plain around him.

At the upper portage camp, the 36-foot long iron frame of the "experiment" was assembled and covered with skins. No successful method to caulk the seams was discovered, however, and the boat was abandoned on July 9. Consequently, five more days were spent building two dug-out canoes out of huge cottonwood trees by a ten-man party under Clark, at a site fourteen miles upstream.

Independence Day was celebrated at the upper portage camp, where all the men and equipment were assembled.

Our work being at an end this evening, we gave the men a drink of Spirits, it being the last of our stock, and some of them appeared a little sensible of it's effects the fiddle was pleyed and they danced very merrily untill 9 in the evening . . . . We had a very comfortable dinner, of bacon, beans, suit dumplings and buffaloe beef &c. in short we had no just cause to covet the sumptuous feasts of our countrymen on this day.  
(Lewis, 4 July 1805)

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July 13, Lewis left the upper portage camp to join Clark at the canoe-building site. July 15, the entire company set out upstream in their eight canoes. By this time, the expedition was very eager to locate the Shoshone as guides across the mountains, having spent a month to portage around the Great Falls which were only the beginning of the Rocky Mountains. At this juncture, it was apparent that a trip to the Pacific and back to Fort Mandan or even the Great Falls that season was out of the question. The time left to cross the Rockies to the Columbia River before winter was growing short and there were great unknown but anticipated obstacles ahead.

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Ferris, Robert G., editor. Lewis and Clark: Historic Places Associated with their Transcontinental Exploration (1804-06). Washington, DC: National Park Service, 1975.

Thwaites, Reuben G., editor. Original Journals of the Lewis and Clark Expedition, 1804-06. 8 vols. New York, 1905-06.

Wheeler, Olin D. The Trail of Lewis and Clark. 2 vols. New York, 1904.

Bergantino, Robert M. "Lewis and Clark Portage Route Map", Butte, Montana, 1984.

Correspondence: Larry Gill, Great Falls, Montana; R.J. McCaig, Montana Power Company; Mrs. LaVern Kahl, Great Falls Public Library; with Roy E. Appleman, NPS, 1964.

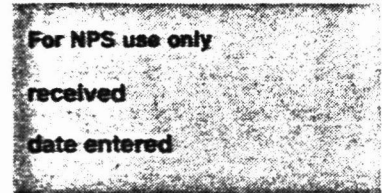
Boundary Review Project survey by Blanche Schroer, NPS, with the assistance of Nels Thorsens and David Conklin, Montana Department of Fish and Game, September, 1975.

On-site survey by Nancy Witherell, NPS, with the assistance of the Portage Route Chapter, Lewis and Clark Trail Heritage Foundation, Inc., June, 1984.



**United States Department of the Interior  
National Park Service**

**National Register of Historic Places  
Inventory—Nomination Form**



Continuation sheet

Item number #10

Page 1 of 2

UTM References:

Section A (north):

- A) 12/497260/5273350
- B) 12/497210/5270800
- C) 12/498140/5270800
- D) 12/498140/5269580
- E) 12/496220/5264900
- F) 12/493720/5263300
- G) 12/488910/5261280
- H) 12/488910/5262675
- I) 12/493120/5264280
- J) 12/495640/5268110
- K) 12/495695/5273340

Section B (south):

- L) 12/481080/5258040
- M) 12/478130/5255390
- N) 12/477695/5255390
- O) 12/477665/5255525
- P) 12/480560/5259100
- Q) 12/481085/5256100

DESCRIPTION:

Starting at a point in the southwest corner of Section 36, T22n,R5E; thence south approximately 1.5 miles to a point in Section 12, T21N, R5E; thence east approximately .5 mile to the east line of Section 12; thence south approximately .8 mile along said section line; thence southwest approximately 3.2 miles to a point on the south line of Section 26, T22N, R5E; thence southwest approximately 1.85 miles to the midpoint on the north line of Section 3, T20N, R5E; thence southwest approximately 3.1 miles to the east curb of a county road in Section 7, T20N, R5E; thence north approximately .9 miles along said road to a point; thence northeast approximately 2.7 miles to a point in Section 33, T21N, R5E; thence northeast approximately 2.9 miles to the midpoint of the south line of Section 14, T21N, R5E; thence north to a point in Section 35, T22N, R5E; thence east to the point of the beginning.

Starting at a point in Section 20, T20N, R4E; thence southwest approximately 2.4 miles to a point on the north curb of a street in Section 25, T20N, R5E; thence west approximately .3 mile to a point; thence northwest to a point; thence northeast approximately 2.6 miles to a point on the midline of Section 17, T20N, R4E; thence east approximately .3 mile to the north-south midline of Section 17; thence south approximately .65 mile along the midline of Sections 17 and 20, T20N,R4E, to the point of the beginning.

United States Department of the Interior  
National Park Service

National Register of Historic Places  
Inventory—Nomination Form

For NPS use only
received
date entered

Continuation sheet

Item number #10

Page 2 of 2

BOUNDARY JUSTIFICATION:

The boundaries of the Great Falls Portage National Historic Landmark include the terrain necessary to convey the historical feeling and association of the portage route and the intrusions at such a scale are minor. The nomination includes the most important points of the portage route, and, while not contiguous for the entire eighteen-mile length, presents a near-complete picture of the portage route.

Although the south section does include some intrusive elements, most notably several blocks of a residential community, the vista is so broad as to mitigate the impact of this area on the original character of the terrain. The cemetery, contained in a grove of trees, does not visually intrude upon the scene. At White Bear Island Camp (upper campsite), the boundary has been drawn to include the actual campsite, now an open field on a dairy farm, and to exclude the now-altered island from which the expedition hunted and fished. Although there are intrusive elements nearby, these are not included in the boundary drawn around the campsite, still similar to its supposed original appearance.

Recent research of the journals and the topography of the site has resulted in accurately located and labeled routes. The landmark boundaries, drawn in consultation with a historian of the portage route, reflect the degree of confidence in the location of the two trails as well as the present state of alteration of the site.

The period of significance was determined so that the acreage enclosed in the boundary corresponds specifically to the portage itself, and does not include additional scouting or survey trips along both riverbanks.

All built elements are non-contributing.

GREAT FALLS PORTAGE NATIONAL HISTORIC LANDMARK

Contents:

- \* Nomination Form
- \* Four USGS 7.5' series (1975) maps:
  - Morony Dam, Montana; Northeast Great Falls, Montana; Southeast Great Falls, Montana; Southwest Great Falls, Montana;
- \* "The Great Falls Portage of Lewis and Clark, 1805-06"--map
- \* 17 photographs:
  - 1) Portage Camp, vicinity of Belt Creek, view to the northwest, downstream, from the east bank.
  - 2) View of mouth of Belt Creek at the Missouri, from the cliff to the east.
  - 3) View across Missouri from the east bank, Sulpher Spring and waterfall (whose waters cured Sacagawea) is located in dark foliage in center of the far bank.
  - 4) View across the Missouri from the east bank, in vicinity of Portage Camp and Belt Creek.
  - 5) View east from near the mouth of Belt Creek, on the east bank of the Missouri. Grove of cottonwoods on the south bank.
  - 6) View east from vicinity of Portage Camp.
  - 7) View southeast from cliff overlooking Belt Creek and Portage Camp site.
  - 8) Section of portage route which crosses area of Malstrom Air Force Base.
  - 9) View west to White Bear Island from road.
  - 10) View west from east side of river, just north of Flattery Run, from believed Lewis and Clark campsite vicinity (river bank has changed considerably since 1805).
  - 11) Giant Springs, located on east side of the Missouri.
  - 12) Rainbow Falls and Dam, from the northeast.
  - 13) Crooked Falls, from the east.
  - 14) Black Eagle Falls from the northeast.
  - 15) View southwest on portage trail route; Mount Olivet Cemetery to left; residential cluster built on portage route.
  - 16) View southwest on portage trail route; Mount Olivet Cemetery to left.
  - 17) View east to Upper Camp (White Bear Island Camp) from River Drive (near original east riverbank),

Property

Great Falls Portage NHL (MT)

State

Working Number

TECHNICAL

CONTROL

Photos \_\_\_\_\_

Maps \_\_\_\_\_

HISTORIAN

Continuation sheets are not originals. Micro-film indicates no earlier nom. ownership (some noted in #7) does not appear complete. Otherwise, the boundaries appear to be well-founded, including

ARCHITECTURAL HISTORIAN

Accept Boundary  
L. McCullers  
1/29/85

c. 14 miles of the original 18 1/2 mile portage stretch and lower and upper campsites. A 4.8-mile stretch separates 2 parcels of the NHL because of intrusions including air force

ARCHEOLOGIST

base of commercial and residential development in city of Great Falls, NHL boundary includes two campsites, sites of significance such as Sulphur Springs and the cottonwood grove

OTHER

and those sections of the surveyed and canal routes of the portage and a surrounding margin of land to convey the feeling and association of the land mark. The few

HAER

Inventory \_\_\_\_\_

Review \_\_\_\_\_

REVIEW UNIT CHIEF

noncontributing elements in the vicinity of the upper campsite do not appear to seriously detract from the historic character and integrity of that area.

BRANCH CHIEF

Boundary approved,  
Ready for notice.  
Boundary ready for finalizing

Carol D. Skell  
1-31-85

Carol D. Skell 6-17-85  
KEEPER

National Register Write-up \_\_\_\_\_

Send-back \_\_\_\_\_

Entered \_\_\_\_\_

Federal Register Entry \_\_\_\_\_

Re-submit \_\_\_\_\_

INT:2106-74

**Secretary Of The Interior's Report  
To The Advisory Council on Historic Preservation  
In Accordance With Section 213 of the National Historic Preservation Act:**

***Evaluation of the Impact of the Proposed Highwood Generating Station on the  
Great Falls Portage National Historic Landmark***

By

Staff, Lewis and Clark National Historic Trail  
Staff, Midwest Regional Office  
Staff, Intermountain Regional Office

United States Department of the Interior  
National Park Service  
Midwest Regional Office  
Omaha, Nebraska

2007

## **Executive Summary**

The Advisory Council on Historic Preservation (ACHP) requested that the National Park Service (NPS) provide a report evaluating the impacts of the proposed Highwood Generating Station (HGS) on the Portage Route of the Lewis and Clark Expedition near Great Falls, Montana. This report addresses (1) the national significance of the route, (2) how the project might affect the integrity of the route, (3) recommendations to avoid, minimize, or mitigate adverse effects to the route, and (4) whether the project would threaten the current designation of the route as a National Historic Landmark (NHL) or require adjustments to its boundary.

The Portage Route's national significance was initially described and documented in its NHL nomination approved in 1966. The boundaries were approved as Great Falls Portage National Historic Landmark in 1985. To be eligible for designation as an NHL, a property must "possess exceptional value or quality in illustrating and interpreting the heritage of the United States." The Portage Route is directly associated with the Lewis and Clark Expedition, a seminal event that had a defining role in establishing the United States as a transcontinental nation. The route itself illustrates the hardships of the undertaking and the dedication and determination of its participants.

As approved by the Department of Agriculture Rural Utilities Service's (RUS) environmental Record of Decision, the preferred alternative site for the HGS is within and adjacent to the NHL. The generating station would introduce major physical, visual, and auditory elements into a landscape that has very few modern intrusions and appears and sounds much as it did when the Expedition traversed the route in 1805 and 1806.

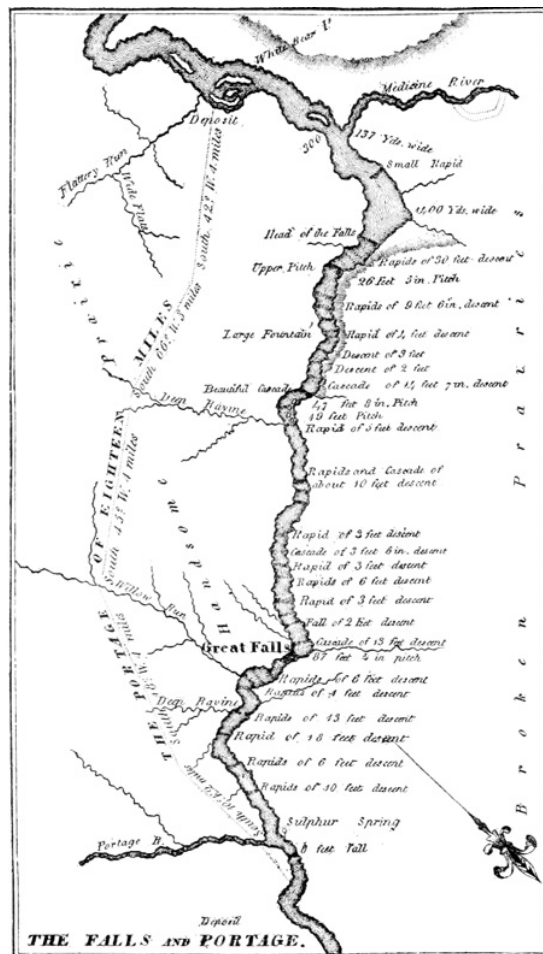
The integrity of the NHL is based mainly on its current condition of large, open, historic and natural landscapes relatively free of intrusions. The proposed HGS and its ancillary features would constitute a broad and wide-scale impact on the surrounding landscape. In such an open landscape, the HGS cannot avoid, minimize, or mitigate adverse impacts sufficiently to maintain the integrity of the NHL.

In order to be designated an NHL, a property must have integrity. Integrity is the ability of the physical features of a property to convey its historical associations or attributes. In order to retain NHL status, a property must retain those essential physical features. The features must define both why a property is significant and when it was significant. Prior to the HGS proposal, the NPS rated the status of the NHL as "Satisfactory." When the HGS project was introduced, the NPS determined the NHL status should be elevated to "Threatened."

The HGS would have wide-spread, profound, and adverse impacts on the NHL and would require a critical review of its integrity; a process which would likely lead to the loss of NHL status for most, if not all, of the route. Since the Portage Route is also part of the Lewis and Clark National Historic Trail (LECL), the HGS would have significant and adverse impacts to LECL, a unit of the National Trails System, administered under the authority of the National Trails System Act and the NPS Organic Act.

# Highland Development Tract 4: A Cultural Resource Inventory and Evaluation

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Mitzi Rossillon, Consulting Archaeologist, LLC  
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 Butte, MT 59701  
 406-299-3073

**Highland Development Tract 4:  
A Cultural Resource Inventory and Evaluation**

by

Mitzi Rossillon

Mitzi Rossillon, Consulting Archaeologist, LLC  
305 W. Mercury, Suite 104  
Butte, MT 59701

submitted to

Thomas, Dean & Hoskins  
1800 River Drive North  
Great Falls, MT 59401

August 19, 2022



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## INTRODUCTION

NWGF Highland Development LLC recently acquired a 124-acre parcel on the south side of Great Falls for the purpose of developing affordable housing for community residents. The proposed development is consistent with NeighborWorks Great Falls' goals of creating strong neighborhoods and enabling successful homeowners. The ell-shaped parcel, in SW¼ Section 19, Township 20 North, Range 4 East, is bordered on the west by 13<sup>th</sup> Street South and on the north by 33<sup>rd</sup> Avenue South (Figure 1).

NeighborWorks is in the early planning stages for its development and, consequently, only concept drawings have been drafted. The concept alternatives identify between 371 and 398 lots that may be developed in five phases. Just as the specifics of subdivision are not currently solidified, neither are project funding sources. However, under ideal conditions and with all required approvals, development may begin in 2023.

Engineering and planning consultant Thomas, Dean & Hoskins subcontracted with Mitzi Rossillon, Consulting Archaeologist, LLC to conduct a cultural resource inventory of the parcel proposed for development. Rossillon Consulting examined the entire proposed subdivision tract.

This document reports the cultural resource findings for the project, also detailing the specifics of local environmental conditions, previous inventories, and the 2022 field investigation. It describes the Great Falls Portage National Historic Landmark (24CA238), the Lewis and Clark National Historic Trail (Great Falls Portage section; 24CA1771), and a newly-documented historic road and artifact scatter associated with the 125<sup>th</sup> celebration of the Lewis and Clark Anniversary Celebration (24CA1931), all three of which intersect the project. Statements about the National Register of Historic Places status are provided for each historic property.

## ENVIRONMENTAL SETTING

Highland Development Tract 4 is on gently sloping ground at the south edge of Great Falls. The soils are well-drained loam, silt loam, and clay loam, and gravels are small in size. The Missouri River is 0.85 mile distant (to the west-southwest) and about 115 feet lower in elevation. There is no surface water on-site.

Local vegetation can be characterized as short grass prairie, and other than grasses includes such plants as sagewort, cinquefoil, clubmoss, wild rose, knapweed, and very small numbers of Russian olive, clubmoss, prickly pear and pincushion cactus, and yucca (Figure 2). At the time of the cultural inventory, ground visibility was between 2 and 5%. However, at hundreds of animal burrows (prairie dog and badger), mineral soil was regularly exposed; ground visibility was enhanced at those locations.

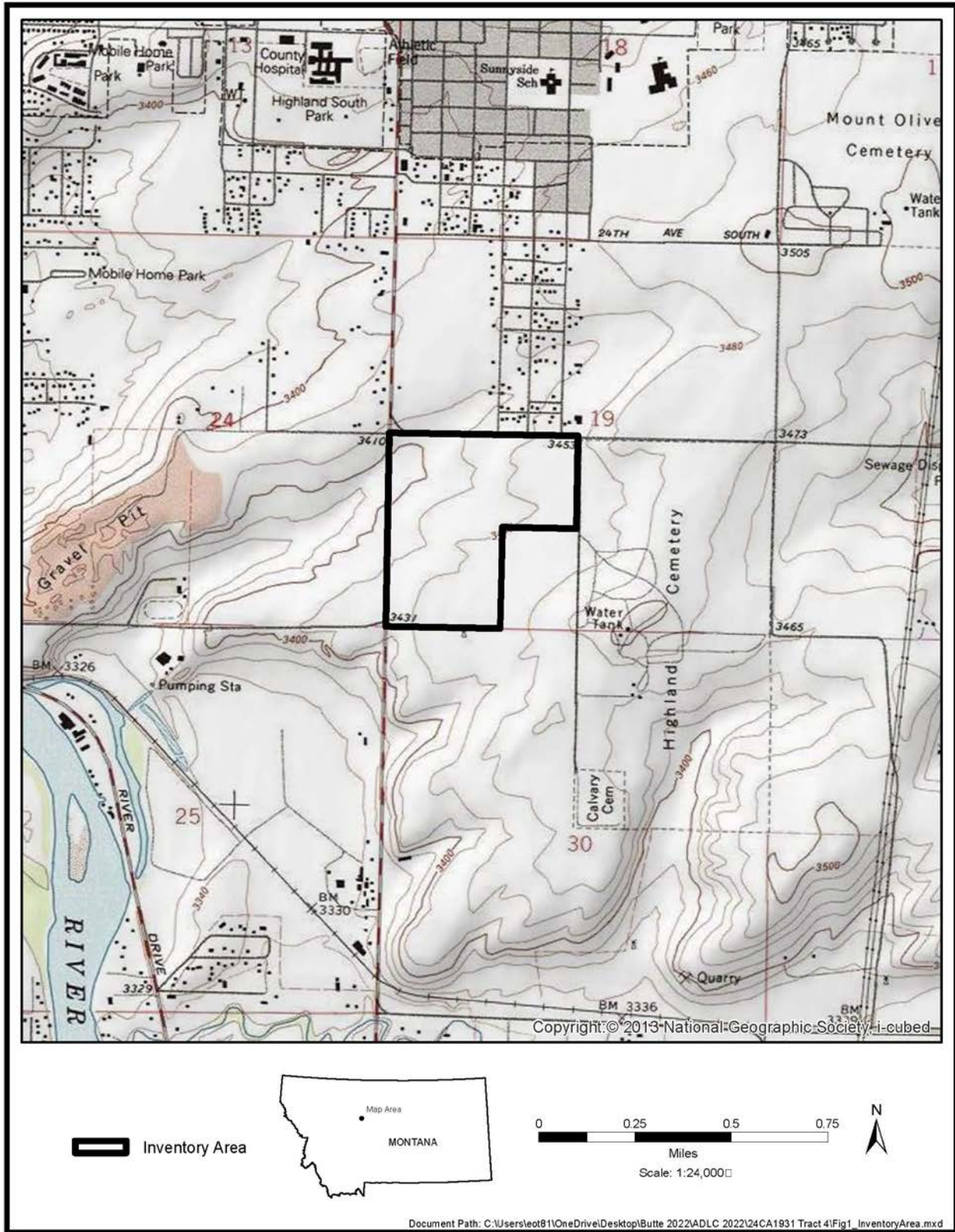


Figure 1. Portion of topographic map showing project location/cultural resource inventory area.



Figure 2. Overview of inventory area from south edge of parcel, showing typical grassy vegetative cover, facing north.

Consulted records, although limited in scope, suggest that the land at this location was never developed, but was likely used initially for sheep and later as cattle grazing. The patentee of the quarter-section in which the inventory parcel lays, physician John H. Fairfield, acquired the land in 1886, and apparently never resided on it. While living in town, though, he also “devoted considerable attention to sheep grazing,” perhaps at his 160-acre patented parcel (A.W. Bowen & Co. c 1903:153-4; *Great Falls Tribune* 1933; Bureau of Land Management 2021). It seems possible that the quarter-section and adjacent land was donated in 1911 to the Great Falls Cemetery Association as part of Highland Cemetery beautification project (*Great Falls Tribune* 1911a, b). Not being within the Highland Cemetery per se, the land parcel of current interest may very well have been used for livestock grazing in subsequent years. It certainly was recently, and a developed spring or well just east of the inventory area provided water for cattle.

## METHODOLOGIES

### Previous Investigations

The Montana State Historic Preservation Office (SHPO) conducted a file search for the project area on May 23, 2022 (#2022052306), prior to the initiation of fieldwork. The search

identified three previous cultural resource inventories and five historic properties, including a historic landmark district, within the same section as the current project.

The largest historic property is the Great Falls Portage National Historic Landmark (24CA238) that was recognized as a landmark in 1966. The landmark district consists of two discontinuous segments, the Upper Portage (west section) of which covers a portion of the current project. A related historic site, the Lewis and Clark National Historic Trail (Great Falls Portage, 24CA1711), passes through the area just beyond the northwest corner of the inventory area. These two resources are described in some detail in the following section.

The other previously-recorded sites in Section 19 are 24CA1653, 1654, and 1656. All are residences 2000 feet or more north of the current project (Hagen and Caywood 2012). One other site, an estimated 350 feet east of the northeast corner of Tract 4, was identified in 1979 as Field Site 4, but was not formally recorded. In the late 1970s, this historic archaeological site consisted of “fire-charred remains, a change in vegetation growth, a few depressions [where shed likely once stood] and artifacts like old bottles, etc.” (Historical Research Associates 1979).

## **Field and Research Methods**

The author of this report conducted the fieldwork for the current project on June 17 and July 11, 2022. She covered the area with parallel pedestrian transects oriented north-south and set 15 meters apart. Selection of the unusually narrow transect spacing acknowledges a criticism of an earlier inventory within the Great Falls Portage Landmark, while recognizing the diminishing returns of walking the recommended 5 meter transects across an open landscape (National Park Service 2007:15).

The single newly-found site located during field inventory—a Lewis and Clark anniversary celebration site (24CA1931)—was recorded on the standard Montana Cultural Site Record form. The author took digital photographs of the site setting, features, and select artifacts. Mapping was accomplished with a resource-grade GPS, with the final site maps prepared using ArcMap.

Most of the research in written documents conducted for this project focused on scientific studies, interpretations, and appreciation for the Lewis and Clark Expedition. The results of this background research inform statements later in this report about the continuing value of the Great Falls Portage Landmark and Lewis and Clark National Historic Trail, commemorating the expedition that occurred over 215 years ago. Consulted sources include but are not limited to articles available through newspapers.com, scholarly and management articles and reports obtained via internet search or local contacts, the full digitized record of the portage landmark housed at the National Archives, the digitized portage landmark file housed at the Montana SHPO, and source material available at the Montana Room of the Great Falls Public Library.

## INVENTORY RESULTS

There are three historic sites in the project inventory area—Great Falls Portage National Historic Landmark (24CA238), Lewis and Clark National Historic Trail Great Falls Portage (24CA1711), and an apparent Lewis and Clark anniversary celebration site (24CA1931; Figure 3). In this section of the report, a history, description, and National Register evaluation are provided for the historic properties.

### **Great Falls Portage National Historic Landmark (24CA238)**

The large historic landmark covers 7700 acres on the right side of the Missouri River, roughly between the White Bear Islands and the Big Eddy below Sulphur Springs. It consists of two sections—Section A at the east or Lower end of the portage route and Section B at the Upper end. These two are separated by a 5.35-mile long section occupied by Malmstrom Air Force Base and a number of densely occupied Great Falls residential neighborhoods that were developed prior to the 1966 landmark designation. Here, following an abbreviated history, the Upper portage end only of the landmark is described.

#### *History*<sup>1</sup>

On June 13, 1805, [Meriwether] Lewis, who had advanced ahead of the main [Corps of Discovery] party, heard the “agreeable sound of a fall of water” and soon “saw the spray arise above the plain like a column of smoke.” This signaled the expedition’s arrival at Great Falls, the first in a succession of five waterfalls that would necessitate an ... overland portage (National Park Service 2021).

Clark and five men mapped out and staked a survey route [for the portage] of about 17.5 miles from a staging area on the plain above Belt Creek to a campsite above all five waterfalls on the east side near three islands in the Missouri River. They named them White Bear Islands, due to the unusually large numbers of grizzly bears they encountered while hunting there.

Journals and maps indicate that at least two routes were used by the men in the 31 days of hauling their supplies to the upper camp. The route the canoes traversed was, no doubt, longer and less direct as they had to go around hills and the many drainages that dissect these high plains. The route the men used as they hand-carried baggage and supplies very likely followed trails that had been established and used by native peoples for tens of thousands of years. ...

On June 16, 1805, the six dugout canoes from the Mandan villages were emptied, floated down river to Belt Creek then up the creek for about a mile and a quarter. The canoes were carried up the steep banks of Belt Creek. A work crew cut 22-inch cross sections from a cottonwood tree trunk to make wheels for several crude wagons. Axles

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<sup>1</sup> With the exception of the introductory paragraph, this history is taken directly from Camp 2007.

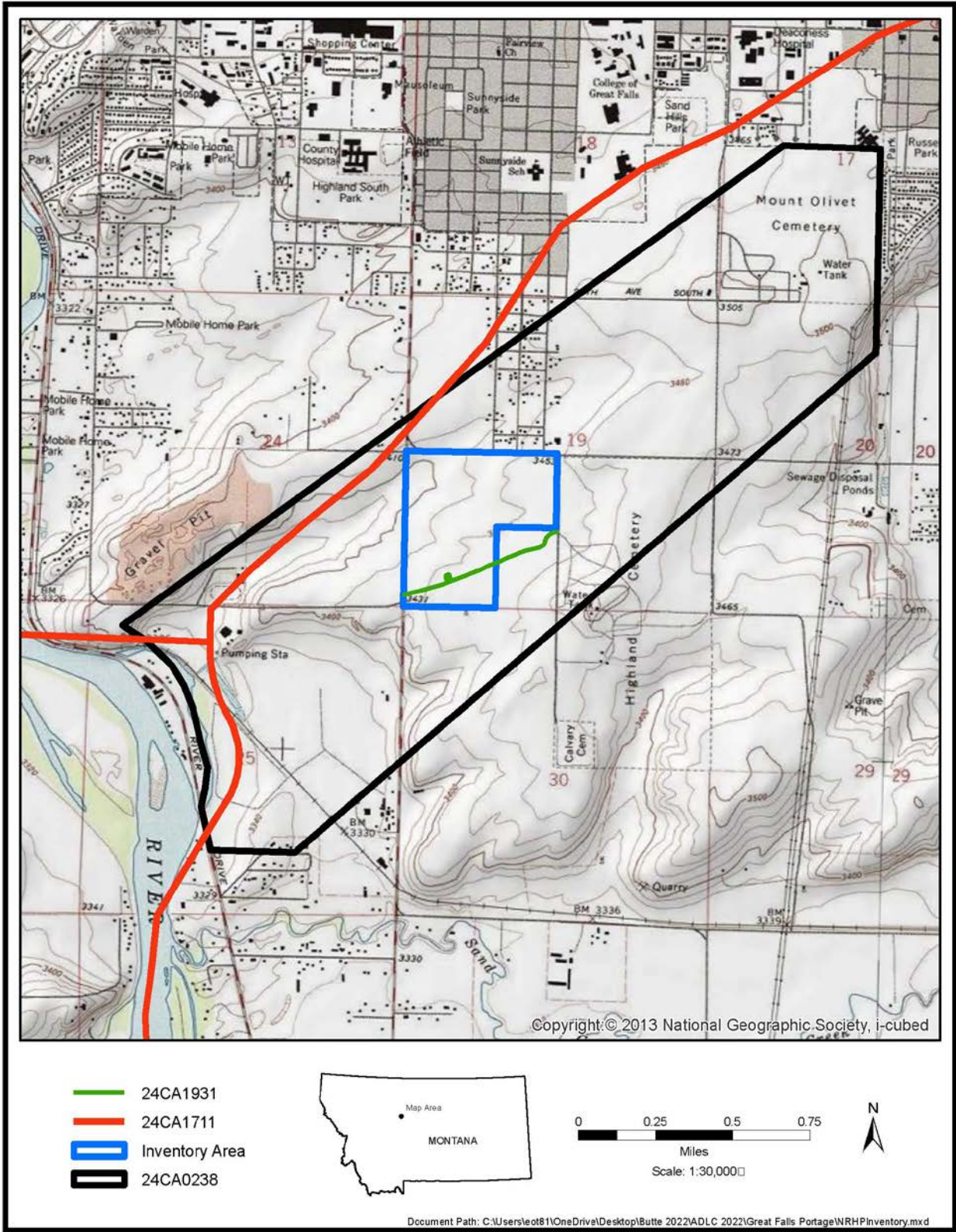


Figure 3. Map showing inventory area in relation to Great Falls Portage landmark (24CA238; Upper), Lewis and Clark National Historic Trail Great Falls Portage (24LC1711), and newly-recorded Lewis and Clark anniversary celebration (24CA1931).



and tongues were made from the mast of the white pirogue, which had been beached and camouflaged near the mouth of the creek. Once assembled, the wagons bearing the dugout canoes were loaded with baggage, supplies, and equipment and were laboriously pulled and pushed across the 18 miles of rough terrain to the upper terminus of the Portage Route. The loads were heavy and the terrain rugged; the axles frequently broke and had to be repaired. Progress was slow and frustrating. The summer heat was debilitating. Rain and wind and hail storms added to the men's misery as they picked their way through swaths of unavoidable prickly pear cactus. On June 29, as the portage neared an end, a violent downpour and hail storm injured several of the men. Clark, Charbonneau, Sacagawea, and her baby nearly drowned when they were caught in a flash flood while on a sightseeing hike to the falls area. All the while, the snow-capped Rockies beckoned in the distance.

En route to the Pacific coast, the Expedition's second Independence Day on the trail was celebrated at the upper portage camp after a regular day of work. With a drink given to each of the men, the last of the liquor stock was consumed. Taking a well-earned break from their hard labor, members of the Corps of Discovery made merry and danced well into the night to the lively tunes played by Pierre Cruzatte on his fiddle.

At the upper camp, the 36-foot collapsible iron boat frame was assembled. Designed and built at Harpers Ferry in 1803, the frame and the expedition's supplies had been transported thousands of miles. The "Experiment" (as it was called in the journals) was covered with animal hides; however, with no pine pitch to seal the seams, it sank in the river and was abandoned on July 9. This resulted in additional delay as ten men built two more dugouts from huge cottonwoods harvested upriver (Clark notes in his journal that the trees were 8 miles away by land and 2¾ miles by water). On July 15, they departed upriver in the eight dugout canoes.

Not only did the Corps of Discovery spend an intensely demanding month portaging its dugout canoes, supplies, equipment, and Indian gifts and trade goods around the Great Falls of the Missouri from mid-June to mid-July, 1805, but Meriwether Lewis and a selected portion of the Corps returned to that site on the homeward journey. When the co-commanders decided to divide the Corps into two contingents at the Travelers' Rest site west of the continental divide for the purpose of exploring new territory along the Yellowstone River and the Marias River, Lewis led his horse-mounted, 10-man reconnaissance unit across today's Lewis and Clark Pass, arriving back at the Upper Portage campsite on the Missouri River on July 11, 1806.

Over the next several days Lewis and his men assembled two bullboats in which they passed the river; swam the horses across without incident; opened the storage caches near the White Bear Islands; and recovered many of the items hidden there the previous year for safekeeping -- such things as, medicines, draft maps and field notes, plant and animal specimens, dispensable clothing and personal items, prepared animal hides, etc. While some items had been damaged by water and had to be jettisoned, the wooden wagon wheels were still usable and the disassembled iron boat frame was found to be largely unscathed.

The plan was for Lewis to divide his group once more and lead a mounted exploration of the upper reaches of the Marias River to determine whether it headed up in

a latitude parallel to, or even farther north than, Lake of the Woods. Before the plan could be put in motion, however, Indians under cover of darkness spirited away ten of the contingent's horses. Left with only ten horses, Lewis reduced his reconnaissance party from six to four men (including him). He then left six men and four horses at the Great Falls campsite and headed for the Marias on July 16th.

The six-man group at the Upper Portage camp was charged with managing the return portage around the falls. As they waited for the arrival of additional help from the 10-man canoe party that had split off, as planned, from Clark's Yellowstone reconnaissance contingent near the Three Forks area on July 13th, a delegation went down to the Lower Portage camp to check on the status of the white pirogue and the condition of goods stored in caches and other places among the rock formations at that location. Finding that all was in good order, members of the delegation removed a few items, including some sorely missed chewing tobacco, and returned to the upper site to complete preparations for the impending portage.

This portage would be different: they were buoyed by thoughts of home; they were more experienced in dealing with hardships; and, they would have the help of four horses to pull the heavy loads. They fashioned harnesses with which to hook the horses to the canoe/wagons. Having recovered the wooden wheels used the year before, they rebuilt the wagons. They were ready for the big move when the canoe party arrived at the falls on July 19th.

The previous year the portage and its preparations had taken a full month. The actual hauling and toting had taken 11 days from start to finish. By contrast, the return portage took only six days with the help of the horses. At the conclusion of the portage, the men recovered the white pirogue from its hiding place near the mouth of Belt Creek. They also reclaimed the swivel gun and blunderbusses hidden among the rocks in the area as well as numerous other items from the caches at that location. On July 28th the canoe/portage unit of the Corps of Discovery was once more waterborne with a flotilla of six vessels and headed for the planned rendezvous with Lewis's reconnaissance unit at the mouth of the Marias River. The men had decided to abandon one of the dugout canoes that was "too injured" to make the return voyage.

### *Description*

As a result of a study conducted by the National Survey of Historic Sites and Buildings, in 1966, the Great Falls Portage National Historic Landmark was identified as a registered National Historic Landmark, found to "possess exceptional value in commemorating or illustrating the history of the United States" (Udall 1966). With the exception of a brief statement about the history of the portage and the path's appearance as of that date, the records of that determination have been lost (National Survey of Historic Sites and Buildings 1966).

At the time of the designation, no boundary was established. But in 1984 the National Park Service conducted additional field investigations and proposed the discontinuous boundary that was adopted (Rogers 1985). The boundary included the most pristine portions of the portage route.

The boundaries of the Great Falls Portage National Historic Landmark include the terrain necessary to convey the historical feeling and association of the portage route and the intrusions at such a scale are minor. The nomination includes the most important points of the portage route, and, while not contiguous for the entire eighteen-mile length, presents a near-complete picture of the portage route.

Although the [west] section does include some intrusive elements, most notably several blocks of a residential community, the vista is so broad as to mitigate the impact of this area on the original character of the terrain. The cemetery, contained in a grove of trees, does not visually intrude upon the scene. At White Bear Island Camp (upper campsite), the boundary has been drawn to include the actual campsite, now an open field on a dairy farm, and to exclude the now altered island from which the expedition hunted and fished. Although there are intrusive elements nearby, these are not included in the boundary drawn around the campsite, still similar to its supposed original appearance. (Witherell 1984)

The western two-thirds of Upper Portage landscape was (and still is) characterized by short hills gently sloping down to the Missouri River. The vegetation was primarily unbroken short prairie grassland, although the far west end was covered by about 225 acres of irrigated field. At the center east side of the Landmark, at the time of the Upper Portage boundary demarcation, 60 acres of an “older” residential subdivision fell within that boundary.

During the last 37 years, however, there have been an increasing number of mainly residential developments within and adjacent to the Upper Portage section. Gentle hills with unbroken grassy cover still dominate, and undeveloped parcels 110 acres and larger lay within and adjacent to the Portage Landmark, although separated by two-lane streets. Modern developments in and near the landmark, however, involve 276 acres of previously unaltered land (Figure 4). Developments range from apartment complexes to residences set on 5-acre lots, and from a school to a large multi-story building under construction in summer 2022 (Figure 5).

#### *Previous Archaeological Investigations at Lewis and Clark Camps in Montana*

Neither the 1985 nomination update nor 1979 and 1999 cultural resource inventories within the Upper Portage route and in the immediate vicinity of the current project reported artifacts or features known or thought to be associated with the Lewis and Clark Expedition (Historical Research Associates 1979, Witherell 1984, Lahren 1999). Because none were found during the current inventory, it is instructive to review previous investigations at Lewis and Clark sites in Montana to explain why expedition physical remains are likely not present or findable at this location.

Professional archaeologists have conducted excavations at three Lewis and Clark Expedition camps in Montana since the late 1980s. Collectively, the work illustrates the absence of period artifacts in a surface setting and the rarity of subsurface artifacts and features as well. Multi-disciplinary team investigations at the Lower Portage Camp, Travelers Rest, and Clark Canoe Camp employed similar methodologies, but findings and confidence in them have been described by others as somewhere between dismal and interesting (see Gulliford 2004:239). Each study is summarized below.

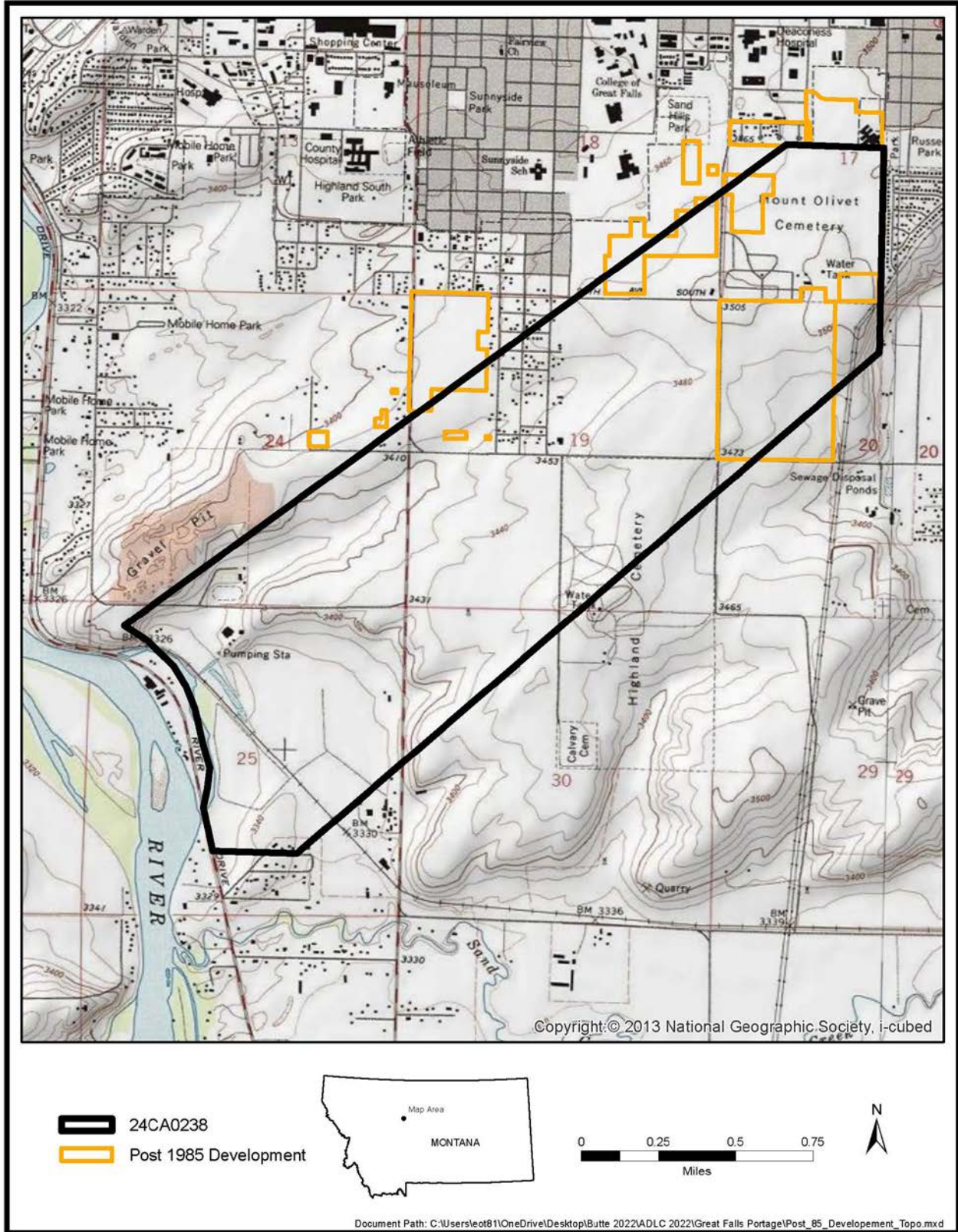


Figure 4. Map showing modern residential and commercial developments built since 1985 in and near the Upper Portage landmark section (24CA238).



Figure 5. Example of very recent construction (apartment complex) in SW¼ Section 18, within portage landmark boundary.

### Lower Portage Camp

Between the late 1980s and 1998, Ken Karzmiski conducted archaeological field investigations including excavations at the apparent site of the Lower Portage Camp east of Great Falls. He led small crews to search the apparent Lower Portage site, as pinpointed by extensive historic research and the results of a magnetometer survey in a 1.5-acre area. The crews' findings are not widely available, having never been published in other than short articles for popular consumption. However, those sources mention 12 fire pits (three of which are in a line spaced 50 feet apart), the impression [in the dirt] of a three-legged iron kettle, an iron push pin, a gun flint, a wooden stake, and bison bones with hatchet marks. Karzmiski reported that radiocarbon dates of the broken stake and bison bone are consistent with the dates of the expedition (Erickson 1991; Saraceni 1998; Stover 1998).

### Travelers Rest

An ambitious project at the site of Travelers Rest in 2001 and 2002 involved a multi-disciplinary team, with Dan Hall as its archaeological director, that confidently pinpointed and interpreted the camp's location south of Missoula. This approach brought a wide range of special studies to the project including but not limited to geoarchaeological investigations, lead isotope analysis, and radiocarbon dating. Remote sensing techniques employed included magnetometer and electromagnetic induction meter surveys in a 0.5-acre area plus a metal detector survey of a wider area. Location of a suspected latrine directed specialists to collect mercury vapor data during excavations to determine areas of particularly high mercury concentrations. Finally, lead isotope analysis, intended to identify the origin and age of lead,

was employed to provide such information about a melted lead object found in an exposed hearth (Hall and others 2003).

Significant archaeological findings of features and artifacts seem to verify that the area examined was indeed the site of Lewis and Clark's Travelers Rest. A central kitchen fire hearth area (concentration of fire-cracked rock) was exposed, as was a latrine. A melted lead object found at one of the hearths that comprised the first feature concentration was examined by lead isotope analysis and sourced to Olive Hill, Kentucky, although could not tie the object specifically to the Lewis and Clark Expedition because the source of the army's lead at that time had not been determined. Radiocarbon dates from two hearth features are consistent with the time of the Lewis and Clark Expedition, although the authors rightfully acknowledge "the relatively recent age of the site and the difficulties inherent with younger C14 dates" (Hall and others 2003:172). Recovered period artifacts are rare, but include a several small lead items, a blue bead of the apparent type that the expedition carried and found useful for trading purposes, and a tombac button that was manufactured exclusively between 1760 and 1812. These data combined with the identification of elevated levels of mercury at an apparent latrine feature (the source of which is thought to be pills used for the treatment of syphilis and used by members of the expedition) round out the evidence for Lewis and Clark occupation.

#### Clark's Yellowstone River Canoe Camp

From 2011 to 2014, archaeological excavations under the direction of Thomas Rust at the site of Clark Canoe Camp employed some of the techniques used by researchers at Lower Portage Camp and Travelers Rest. In addition to geophysical analysis and magnetometer and soil resistivity surveys, the crew used a mercury vapor analyzer to detect elevated levels of mercury at two tested anomalies, submitted pieces of lead and an apparent unfired musket ball for lead isotope identification, and radiocarbon dated hearth charcoal and animal bone (Rust 2017).

Several attributes that this site shares with Lower Portage Camp and/or Travelers Rest are strongly suggestive of positive identification of this site as that known as Clark Canoe Camp. These include localized trace mercury in the soil, identical lead isotope signature of the possible musket ball, feature placement consistent with military protocols used by the expedition, and radiocarbon dates consistent with those of the expedition (although inconclusive due to recent radiocarbon). Unfortunately, because no diagnostic artifact types were uncovered and with the absence of a stone enclosure at a hearth, the evidence of Corps of Discovery occupation has some limitation but is by no means discounted.

#### Implications for Finding Similar Archaeological Data within Current Project Area

As noted above, the author found no surface artifacts or features attributable to the 1805-1806 Lewis and Clark Expedition during surface inventory, and did not expect to do so. The position of the inventory area just over 1 mile from the Upper Portage camp and the absence of any mention in the expedition diaries of an overnight camp at or near this location makes it very unlikely that an undetected concentration of artifacts is present.

For good reason, Lewis and Clark Expedition archaeology scholars have focused their attention most often on campsites. Those sites are better described by the explorers and their locations were often noted in reference to geographic landmarks, many of which remain today in some form. Further, attempts to identify specific camp locations using archaeological methods are laborious and are likely to produce ambiguous results. Archaeological excavations at the three Lewis and Clark camps in Montana mentioned above have demonstrated the difficulty of finding remains left by expedition members within *known* camp sites, much less non-camp locations. For each of the camps identified in Montana, their locations were identified by georeference using written descriptions of geographic features, geophysical analyses, lengthy archaeological excavation, and probing for and analyzing trace metals. More specifically, researchers have depended on magnetometer, electromagnetic induction, and/or soil resistivity meter surveys to pinpoint the locations of suspected features, but due to cost constraints have examined areas of less than 2 acres. They reported a high concentration of mercury at latrine (or possible latrine) features, but only after identification of those features was pinpointed by geophysical analyses and subsequent archaeological testing. Also, the numbers of artifacts found at each camp or suspected camp are very small, and few items are temporally diagnostic. Radiocarbon dates for recovered organic materials are consistent with the time of the Lewis and Clark Expedition, but when calibrated for atmospheric carbon are found to date more broadly between the late 1600s and about World War II (Rust 2017).

Intensive work at non-camp locations along the route of the Lewis and Clark Expedition have not been conducted, to the author's knowledge. In addition to being cost prohibitive due to the difficulty of pinpointing the location of a very brief occupation, non-camp sites would likely yield few if any unambiguous results.

### *National Register Listing*

#### Significance

The Great Falls Portage National Historic Landmark is a registered National Historic Landmark, found to “possess exceptional value in commemorating or illustrating the history of the United States” (Udall 1966). Since listed, scholars, resource managers, foundations, and the public in general continue to celebrate the significance of the Great Falls Portage landmark. See, for example, the significance statement prepared by the National Park Service 15 years ago:

The Great Falls Portage NHL is among the few sections of the historic route of the [Lewis and Clark National Historic Trail] that can be identified and mapped using William Clark's original survey notes. The hardships faced during this 31-day portage were among the toughest ordeals encountered by the explorers and threatened the success of the Expedition. The delay occasioned by this portage was critical because the Corps of Discovery needed to traverse the “unknown” Rocky Mountains before the onset of winter. The property's designation as an [National Historic Landmark] was based upon the national significance of the event and the high integrity of the resource – the largely unimpaired landscape within which the event took place. (National Park Service 2007)

Also in 2007, a letter to the editor of the Great Falls Tribune reminded the city's citizens of the landmark's historic importance:

...of the quietly misleading prairie landscape that proved a month-long ordeal for the Corps over two centuries ago. It is human nature to take for granted that which is ordinary and familiar, but this small piece of the prairie continues to tell an important story. The Great Falls Portage is a real, identifiable site that has been memorialized, interpreted, celebrated and reenacted ... . (Sievert 2007)

## Integrity

The integrity of a historic landmark such as the Great Falls Portage, at which human-made constructs are few if they exist at all, often depends on evaluation of the landscape that the place occupies, both within the boundary and also that which can be viewed outward. Here, a “formal, organized historic/cultural landscape documentation” has never been written, although broadly the National Park Service in 2007 identified criteria for assessing integrity at the portage landmark as a whole.

The Great Falls Portage landmark retains integrity of location because it “is the place where the historic event occurred” and is “is accessible in the same manner as that used by the Corps of Discovery.” Under the aspect of design, it “retains overall spatial organization, physical relationships, scale and proportion present during the historic event. ... The scale and sense of great openness remains.” Integrity of materials is retained because the “biotic components native to the region” are still in place (short grass prairie). The presence of irrigated fields has little impact on this aspect of integrity because the “appearance of open land” is maintained. The natural state of the landmark is evident by “the natural processes of regeneration and succession dependent upon the climate and time” (integrity of workmanship). The setting (particularly at the Lower Portage section) is the landmark’s “natural context ... defined by the natural soundscape, clear air, and unimpeded night sky.” Integrity of association is unassailable, because the landmark’s demonstrated relationship with the Lewis and Clark Expedition. Finally, integrity of feeling really is characterized by integrity of all other aspects combined, which can be interpreted as a “respect for perseverance and accomplishment faced by humans in a landscape environment that dwarfed them in comparison” (National Park Service 2007).

Completion of a comprehensive evaluation of the cultural landscape that the National Park Service has argued is needed is beyond the scope of the current cultural report. However, the rural landscape of the Upper Portage portion of the landmark is steadily yielding to development pressure on the south side of Great Falls. The acreage within that section that can now be named “pristine” has been reduced by 150 acres within the landmark boundary, almost all of that at the northeast end of the section. Even so, large parcels of undeveloped or minimally developed land survive within and beyond the south edge of the boundary, such that overall integrity has been diminished but not lost (Figures 6 and 7).





Figure 6. 1985 photograph of portage trail route (Witherell 1984).



Figure 7. Repeat photograph of 1985 image showing undeveloped parcel in foreground, facing southwest.

## **Lewis and Clark National Historic Trail Great Falls Portage (24CA1711)**

### *Description*

The Great Falls Portage segment of the Lewis and Clark National Historic Trail is a 38-mile-long site, for which the recorder identified a corridor width of 30 miles centered on the Missouri River. That corridor involves the viewshed both to and from that river. For practical purposes, the Montana SHPO has identified in its mapping records a corridor 1 mile rather than 30 miles wide (trail centerline shown in Figure 3). According to the site form,

Physical features considered to be part of the site include the [Missouri] river and the landscape; its vegetation, topography and natural features are included on both sides of the river. This segment of the Lewis and Clark National Historic Trail includes the Great Falls Portage National Historic Landmark . . . . (Gladstone 2012)

The marking of the route of the Lewis and Clark Expedition across the United States has been part of a decades-long National Park Service effort to incorporate modern mapping methods with historical accounts of the expedition and opportunities for recreational use. The stated purpose of national historic trails, including the Lewis and Clark National Historic Trail, is “the identification and protection of the historic route and its historic remnants and artifacts for public use and enjoyment” (National Park Service 2012).

### *National Register Eligibility*

There has been no official National Register eligibility determination. Because the historic trail lies within and immediately adjacent to the upper portion of Great Falls Portage Landmark, though, for management purposes it is considered indistinguishable from the portage route landmark in this area.

## **Lewis and Clark Anniversary Celebration (24CA1931)**

This archaeological site is thought to date to July 5, 1930, and is the remains of a commemorative event that celebrated the 125<sup>th</sup> anniversary of the Corps of Discovery’s Fourth of July celebration at the Upper Portage White Bear Campsite. It consists of a small historic artifact scatter and a pair of faint two-track roads located near the south end of the current project inventory area (Figure 3).

### *History*

In the early 1900s, about 110 years after the Lewis and Clark Expedition first passed through what would become the Great Falls area, there was an effort to recognize the important role that it played in the history of the US and of the city. At Great Falls, calls for tree plantings and a park near White Bear Islands were minor and unanswered, respectively (Great Falls Tribune 1914, 1915). But as the 125th anniversary of Lewis and Clark’s Fourth of July

celebration at the Upper Portage site neared, more concrete plans for a celebration formed, in part due to the encouragement of the newly formed Lewis and Clark Memorial Association.

That association, organized in Lewiston, Idaho in October 1929, had the stated purpose of recognizing the expedition's accomplishment. Among the promotion efforts the group espoused was one to create a highway that would link St. Louis and the mouth of the Columbia River ([Boise] Idaho Statesman 1929; Lewis 2008:198, 207). While increasingly long sections of the highway system were in-place as state efforts at road improvement progressed across the western US, an improved highway to replace the rough Lolo Pass road, the Lewis and Clark Memorial Association argued, could serve as the shortest route between existing highways (Great Falls Tribune 1930e).

Planning for Great Falls' Fourth of July celebration in 1930 began late the previous year. The Great Falls Chamber of Commerce planned to celebrate both the Lewis and Clark Expedition, during which the men spend the Fourth of July 1805 at or near the Upper Portage site, and the birthday of Great Falls founder Paris Gibson. R.G. Bailey of the Lewis and Clark Memorial Association intended to organize as part of the celebration "two large [automobile] caravans, traveling as near as practicable, over the road from St. Louis to the mouth of the Columbia River" that would pass through Great Falls at that time (Great Falls Tribune 1929).

As the Fourth of July celebration approached, plans for a full line-up of events grew. Activities were to include a fireworks display, a pageant depicting historic events, a parade including a section for "antiquated vehicles, dress and equipment," horse and foot races, a first aid demonstration, recognition of Great Falls pioneers, a band concert, a fiddler's contest, and guided tours to "places of interest about the city" (Great Falls Tribune 1930a, b, c). One of the planned featured tours for July 5 was "to the spot where on July 4, 1805, Lewis and Clark camped near White Bear island, south of the city" (Great Falls Tribune 1930d).

Specifics of the guided tour are not provided in the sources consulted, nor is there any account about whether the expected "two large caravans" materialized. But the unusual pair of roads along the portage route suggests a planned tour that would accommodate the caravans as well as interested local citizens. And the small artifact scatter, while not at the July 4 1805 campsite of Lewis and Clark, may have provided refreshments as visitors viewed the upper portage route from the hills above White Bear Islands.

### *Description*

The observed thin scatter of historic artifacts at 24CA1931 is mainly north of and midway along the pair of two-track roads (Figure 8). Found across an area of less than 6000 square feet, both on the undisturbed surface and around a single animal burrow, the artifacts are a slightly unusual collection suggestive of a short, single period of use in the 1930s. Temporally diagnostic items that provide the best estimated date of use are ironstone dinnerware sherds.

Ceramic items are exclusively whiteware hotelware sherds. Three bear manufacturer marks of the companies Shenango, Buffalo China, and T. & R. Boote. The former mark was observed on a plate, and is thought to identify the maker of all vessels having one or two thin



Figure 8. Overview of artifact scatter at 24CA1931, boundary marked by pin flags, facing west.

green lines at the rim or cup handle. It dates to the 1920s and 1930s, and was, according to the mark, “Made for Joestein & Schillings St. Paul” (hotel, restaurant, and institution outfitters). The Buffalo China mark was found on an undecorated saucer that was made in 1924 (Figure 9). The T. & R. Boote mark on the base of a footed bowl was of a British manufacturer who made it for Burley & Co. of Chicago, between 1890 and 1906. The fragment has a single blue line above the base. Other dinnerware shapes include those of cups and bowls. A different whiteware sherd, of unknown vessel shape, has a brown glaze on the exterior.



Figure 9. Buffalo China maker's mark on base of undecorated hotelware saucer.

The remaining items are either glass or metal. The former include an aqua bottle/jar body sherd (probably from a canning jar), two clear pieces of bottle glass, a pint-sized round brown bottle base, and a clear rectangular bottle fragment with a molded horizontal line. There are also pieces of two zinc canning jar lids. Other metal artifacts are about 14 pieces of head hoops from presumed nail kegs, hoops mainly of a smaller variety from barrels only about 15-18 inches in diameter, pieces of about four sanitary food cans, fragments from a possible coffee pot, and a single metal corset stay.

The pair of historic two-track roads 0.5-mile-long that pass by the artifact scatter has a unique configuration. The two roads, which lay parallel to each other for the most part, are 12 feet apart, with an entire corridor width of (usually) 27 feet. Each two-track is between 4 and 6 inches lower in elevation than the surrounding ground, and the track width (axle track) is 52-54 inches. There are no culverts, bridges, retaining walls, or other special design features along this section of road.

### *National Register Eligibility*

#### Significance

While certainly unique, the site lacks significance in all respects. It was not associated with an important event or development in the history of Great Falls (Criterion A). The individual who may have been key to the event that occurred on this site, R.G. Bailey of the Lewis and Clark Memorial Association (organizer of the 1930 auto caravans), is not known have made particularly important contributions to the history of Lewis and Clark commemorations (Criterion B). Aside from the two-track roads, there are no architectural or engineering remains on-site, and the roads do not distinguish themselves with unusual or high value design (Criterion C). The numbers and variety of types of artifacts at this site are not sufficient to yield additional information about site function that is not already suspected from written records (Criterion D).

#### Integrity

The site appears to retain archaeological integrity because the range of artifacts present are consistent with the apparent short-term function of a commemoration site. Unfortunately, other than supporting the date of use, they do little to illuminate the types of activities held or foods consumed, numbers and types of participants, or other questions that one might posit about the event.

#### Evaluation

Site 24CA1931 is not eligible for listing in the National Register of Historic Places because it lacks significance. It is likely the remains of a single event in 1930 that commemorated the 125<sup>th</sup> anniversary of the Lewis and Clark Expedition. That event was not important in Great Falls history and not associated with an important individual, though. The site lacks any architectural or engineering elements and the archaeological remains are too limited to be of scientific interest.

## SUMMARY

NeighborWorks Great Falls has proposed to develop a residential subdivision at the south edge of the city to provide much-needed affording housing. The development will occupy a 124-acre parcel that most recently was used for livestock grazing.

Rossillon Consulting conducted a cultural resource inventory of the project area in June and July 2022. A file search of previously-recorded sites and the 2022 fieldwork identified three historic properties. They are the Great Falls Portage National Historic Landmark (24CA238), Lewis and Clark National Historic Trail Great Falls Portage (24CA1711), and Lewis and Clark Anniversary Celebration (24CA1931). The portage landmark is recognized as of national importance. The historic trail shares the significance of the portage landmark although its National Register eligibility is unresolved. Finally, the 1930 celebration site is not a National Register property.

The proposed subdivision falls entirely within the Upper Portage section of the landmark. The historic trail centerline passes immediately beyond the northwest corner of the parcel, although the corridor width overlaps the parcel itself. Finally, the artifact concentration portion of the celebration site is entirely within the development parcel, while the two-tracks pass through and continue on to the east.

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**MEMORANDUM OF AGREEMENT  
AMONG  
UNITED STATES DEPARTMENT OF AGRICULTURE RURAL HOUSING SERVICE,  
MONTANA STATE HISTORIC PRESERVATION OFFICER,  
ADVISORY COUNCIL ON HISTORIC PRESERVATION,  
NATIONAL PARK SERVICE,  
AND NEIGHBORWORKS GREAT FALLS  
FOR COMPLIANCE WITH SECTION 106  
OF THE NATIONAL HISTORIC PRESERVATION ACT  
REGARDING THE  
SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT,  
GREAT FALLS, CASCADE COUNTY, MONTANA**

**WHEREAS**, the United States Department of Agriculture, (USDA) Rural Housing Service (RHS) is authorized to provide 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**, NeighborWorks Great Falls (NWGF) has requested a Mutual Self-Help Housing Technical Assistance Grant from the RHS 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 requested funding will be used by NWGF for Phases I and II of the planned development; and

**WHEREAS**, NWGF, plans to construct a multi-phase development on a ±123.8-acre site located on the south side of Great Falls, Montana, Cascade County, Montana (herein referred to as Project or Undertaking). 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;”. The first phases of the Project, comprising approximately 62-acres, will involve residential housing that will be partially funded through the USDA-Rural Development Mutual Self-Help Program (MSHP). Future phases will likely consist of mixed-use and residential housing development. The project will conform to the approved Master Plan per the attached Exhibit 1, Location Map and Area of Potential Effect to this Memorandum of Agreement (MOA).;

**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 USC 306108, and its implementing regulations, 36 CFR Part 800; and

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

**WHEREAS** RHS has determined that the undertaking will have an adverse effect on the Great Falls Portage NHL, Upper Portage (24CA238), NHL and the Lewis and Clark National Historic Trail (24CA1711)), and has consulted with the Montana State Historic Preservation Office (MT SHPO), National Park Service (NPS), and the Advisory Council on Historic Preservation (ACHP) pursuant to 36 CFR Part 800; and

**WHEREAS**, the RHS has notified the Secretary of the Interior (SOI) in accordance with 36 C.F.R. § 800.10(c), and the National Park Service’s (NPS) Regional Office Interior Region(s)

53 [#] (NPS Regional Office), and the [Park unit] are representing the SOI, and have been invited to  
54 sign this MOA as an invited signatory, and that both the NPS Regional Office and [Park unit]  
55 will receive information and participate in consultations, and that the NPS Regional Office will  
56 be the signatory authority for NPS; and

57  
58 **WHEREAS**, in accordance with 36 CFR § 800.6(a)(1), RHS notified the ACHP of its  
59 adverse effect determination with specified documentation on October 24, 2023, and the ACHP  
60 responded on November 8, 2023 they had chosen to participate in the consultation pursuant to 36  
61 CFR § 800.6(a)(1)(iii);and

62  
63 **WHEREAS**, RHS has invited NWGF to sign this MOA as an Invited Signatory; and

64  
65 **WHEREAS**, the RHS, MT SHPO, and the ACHP are each a “Signatory,” and the  
66 NWGF and the NPS are an “Invited Signatory” to the MOA and, hereafter are “Signatories”; and

67  
68 **WHEREAS**, the RHS has determined the following Federally recognized Tribes may  
69 have an interest in the undertaking and invited them to participate in the Section 106 consultation  
70 in letters dated March 23, 2023: Apache Tribe of Oklahoma, Blackfeet Tribe of the Blackfeet  
71 Indian Reservation of Montana, Crow Tribe of Montana, Fort Belknap Indian Community, and  
72 the Little Shell Tribe of Chippewa Indians; and

73  
74 **WHEREAS**, the Little Shell Tribe of Chippewa Indians Tribe responded to the  
75 invitation, but did not elect to participate in the consultation; and

76  
77 **WHEREAS**, RHS has consulted with the following parties regarding the effects of the  
78 undertaking on historic properties and has invited them to sign this MOA as concurring parties:  
79 The Lewis and Clark Trail Heritage Foundation, National Trust for Historic Preservation,  
80 Preserve Montana, Lewis and Clark Interpretive Center, City of Great Falls Historic preservation  
81 Officer (City HPO)), Portage Route Chapter of Lewis and Clark Trail Heritage Foundation,  
82 Lewis and Clark Interpretive Center Foundation, Great Falls Habitat for Humanity, Home  
83 Builders Association of Great Falls, Great Falls Housing Authority, Indian Family Health Clinic,  
84 Great Falls Development Authority, City of Great Falls (City) Planning and Community  
85 Development, Great Falls Chamber of Commerce, Cascade County Planning Department, Great  
86 Falls Montana Tourism Office; and

87  
88 **WHEREAS**, RHS has afforded members of the general public and other interested parties to  
89 participate in and comment on this undertaking in accordance with the public review process in 7  
90 CFR 1970.14 and 36 CFR 800.2(d)(1). A local newspaper advertisement was published on ----,  
91 2024, and -----, 2024, in the ----- . The -----day comment period ended on -----, 2024.  
92 RHS received no comments; and

93  
94 **NOW, THEREFORE**, RHS, MT SHPO, ACHP, NPS, and NWGF agree that the  
95 undertaking shall be implemented in accordance with the following stipulations in order to take  
96 into account the effect of the undertaking on historic properties.

97  
98 **STIPULATIONS**

99  
100 RHS, in coordination with NWGF, shall ensure that the following measures are carried out:

101  
102 **I. ROLES AND RESPONSIBILITIES**

103

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

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- A. **RHS (Signatory) shall:**
  1. Provide annual reports from NWGF to the Signatories and Invited Signatories regarding progress and status of the MOA.
  2. Coordinate with NWGF 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 NWGF to ensure that construction contracting documents shall include post-review discovery requirements provided in Stipulation 11, including contact names and telephone numbers for the RHS and MT SHPO, and that their construction contracts include the Inadvertent Discovery Plan provided in **Exhibit**.

- B. **MT SHPO (Signatory) shall:**
  1. 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).
  2. Consult regarding the need for additional identification and evaluation efforts.
  3. Support through expertise successful completion of mitigation, preservation, and recordation efforts as outlined in the MOA.

- C. **NPS (Invited Signatory) shall:**
  1. 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).
  2. Consult regarding the need for additional identification and evaluation efforts.
  3. Support through expertise successful completion of mitigation, preservation, and recordation efforts as outlined in the MOA.

- D. **NWGF (Invited Signatory) shall:**
  1. :

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

**II. MITIGATION**

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**A. NWGF shall:**

1. Develop and implement a plan based on Exhibit 2, Master Plan, for a 9.5-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 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 minimum 6-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. Apply Development Standards, Exhibit 3, 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 will include a comprehensive night sky-friendly lighting design plan for the entire development agreement for minimizing light pollution to protect the natural nighttime environment. These design guidelines will apply to all phases of the project is ultimately approved and enforced by the Development Agreement between NWGF and the City of Great Falls and will comply with City of Great Falls code requirements. 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.
4. Collaborate with the City of Great Falls 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.
5. Based on recommendations provided by the NPS, use the completed Viewshed Analysis, Exhibit 4, to identify scenic views within the project area and implement measures to preserve and enhance these views in the Master Plan.
6. 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.
7. NWGF will prepare Level I Historic American Landscape Survey (HALS) documentation of the Great Falls Portage NHL. The documentation will be prepared in accordance with the Secretary of the Interior’s Standards and

195 Guidelines for Architectural & Engineering Documentation. Prior to the  
196 construction, NWGF will document landscape characteristics as specified by  
197 the standards outlined in NPS guidance documents: Historic American  
198 Landscapes Survey Guidelines for Historic Reports and the NPS-prepared  
199 SOD. The submittal will include written, graphic, and photographic  
200 documentation and measured drawings packaged and submitted as per the  
201 SOD included as Exhibit 5 to this MOA. NWGF will provide copies of the  
202 documentation to the RHS and the RHS will provide the copies to the  
203 Signatories, except for the ACHP, and to the following repositories: the MT  
204 SHPO; and the National Park Service/Library of Congress.  
205

- 206 **8.** NWGF will coordinate with the MT SHPO and \_\_\_\_ to ensure the following public  
207 interpretation measures are implemented to share the results of Stipulation IV.B  
208 and the unique stories of the Great Falls Portage NHL and national Historic Trail  
209 with the public.
- 210 **1.** list topics interpretation would cover;
  - 211 **2.** a range of how many signs, One large enough panel could cover multiple subjects and feature QR  
212 codes to further information;
  - 213 **3.** If QR codes, to what website? An established, maintained site is preferable.
  - 214 **4.** Describe generally where would any signs be installed, i.e. in conjunction with views, or paths
- 215
- 216 **9.** NWGF shall coordinate with the NPS to minimize adverse effects to the prairie  
217 landscape setting by using appropriate native vegetation for landscaping and by  
218 avoiding the use of invasive species in accordance with Master Plan.  
219
- 220 **10.** NWGF shall ensure all construction contracts include the Inadvertent Discovery Plan  
221 provided in Exhibit 6 and their contractors are familiar with and abide by those  
222 requirements.  
223

## 224 **PROFESSIONAL QUALIFICATIONS AND STANDARDS**

- 225
- 226 **A.** Professional Qualifications. Pursuant to Section 112(a)(1)(A) of the NHPA (54  
227 USC §306131(a)(1)(A)) and 36 CFR § 800.2(a)(1), RHS shall ensure that all  
228 technically critical activities carried out pursuant to this MOA will be conducted by  
229 or under the direct supervision of appropriate historic preservation professionals  
230 meeting the Federal qualifications in the discipline appropriate to various activities  
231 required under this MOA. Pertinent references are the Secretary of the Interior’s  
232 Professional Qualifications Standards published in 48 Federal Register (FR) 44738–  
233 44739 (1983) and 36 CFR Part 61, Appendix A (1998)).  
234
- 235 **B.** Standards and Guidelines. All activities carried out pursuant to this MOA shall  
236 align, as applicable, with the Secretary of the Interior’s Standards and Guidelines for  
237 Archeology and Historic Preservation (48 Federal Register 44716 – 44742,  
238 September 23, 1983) and the Secretary of the Interior’s Standards for the Treatment  
239 of Historic Properties (36 CFR Part 68; 60 Federal Register 35,842 – 35,844, July

240 12, 1995) and the ACHP's current Policy Statement On Burial Sites, Human  
241 Remains, And Funerary Objects, March 1, 2023.

242

243 **POST-REVIEW DISCOVERIES**

244 If during the course of any ground disturbance related to any portion of the Project, any post  
245 review discovery, including but not limited to, any artifacts, foundations, or other indications of  
246 past human occupation of the area are uncovered, NWGF shall ensure protection by complying  
247 with the Inadvertent Discovery Plan provided in Exhibit 6.

248

249 **MONITORING AND REPORTING**

250 Every year, within 30 calendar days of the date of the final signatory's execution of this  
251 MOA, NWGF Great Falls shall provide to all Signatories a written report regarding the  
252 actions taken to fulfill the terms of the agreement. RHS shall file a copy with the ACHP per  
253 36 CFR § 800.6(b)(iv). Such report shall include status updates on construction and  
254 mitigation activities, summary of any scheduling changes proposed, any problems  
255 encountered, and any disputes and objections received in efforts to carry out the terms of this  
256 MOA. Such reporting shall cease when the terms of the MOA have been fulfilled or upon  
257 agreement of the Signatories.

258

259 **DISPUTE RESOLUTION**

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

263 **C.** Forward all documentation relevant to the dispute, including RHS's proposed  
264 resolution, to the ACHP. The ACHP shall provide RHS with its advice on the  
265 resolution of the objection within 30 calendar days of receiving adequate  
266 documentation. Prior to reaching a final decision on the dispute, RHS shall prepare  
267 a written response that considers any timely advice or comments regarding the  
268 dispute received from the ACHP or other Signatories and provide them with a copy  
269 of the written response. RHS will then proceed with its final decision.

270 **D.** If the ACHP does not provide its advice regarding the dispute within 30 calendar  
271 days of receiving the information from RHS, RHS may make a final decision on  
272 the dispute and proceed accordingly. Prior to reaching such a final decision, RHS  
273 shall prepare a written response that considers any timely comments regarding the  
274 dispute received from the Signatories to the MOA and provide them and the  
275 ACHP with a copy of the written response.

276 **B.** RHS's responsibility to carry out all other actions subject to the terms of the  
277 MOA that are not the subject of the dispute remain unchanged.

278

279 **AMENDMENTS**

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

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**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.

**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.

**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.

**GENERAL PROVISIONS**

- E. 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.
- C. 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, ACHP, NPS, and NWGF 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.



325 **MEMORANDUM OF AGREEMENT**  
326 **AMONG**  
327 **THE RURAL HOUSING SERVICE,**  
328 **MONTANA STATE HISTORIC PRESERVATION OFFICER,**  
329 **NATIONAL PARK SERVICE, AND**  
330 **ADVISORY COUNCIL ON HISTORIC PRESERVATION**

331  
332 **REGARDING THE**  
333 **NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING**  
334 **CONSTRUCTION DEVELOPMENT, GREAT FALLS, CASCADE COUNTY,**  
335 **MONTANA**  
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338  
339 SIGNATORY 1 of 3

340 **Advisory Council on Historic Preservation**

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346 \_\_\_\_\_ Date  
347 **Reid Nelson**  
348 **Executive Director**  
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351 **MEMORANDUM OF AGREEMENT**  
352 **AMONG**  
353 **THE RURAL HOUSING SERVICE,**  
354 **MONTANA STATE HISTORIC PRESERVATION OFFICER,**  
355 **NATIONAL PARK SERVICE, AND**  
356 **ADVISORY COUNCIL ON HISTORIC PRESERVATION**

357  
358 **REGARDING THE**  
359 **NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING**  
360 **CONSTRUCTION DEVELOPMENT, GREAT FALLS, CASCADE COUNTY,**  
361 **MONTANA**

362  
363 SIGNATORY 2 of 3

364 **Rural Housing Service**

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369 \_\_\_\_\_ Date  
371 **Rob Nelson**  
372 **Assistant Director, Program Support Services**  
373 **USDA Rural Development**

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**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, CASCADE COUNTY,  
MONTANA**

SIGNATORY 3 of 3

**Montana State Historic Preservation Officer**

\_\_\_\_\_ Date  
**Pete Brown, State Historic Preservation Officer**

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**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, CASCADE COUNTY,  
MONTANA**

INVITED SIGNATORY 1 of 2

**National Park Service**

\_\_\_\_\_ Date  
**[insert name and title]**

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**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, CASCADE COUNTY,  
MONTANA**

**INVITED SIGNATORY 2 of 2:**

**Neighborworks Great Falls**

\_\_\_\_\_  
**Sherrie Arey, Executive Director** Date

443 **MEMORANDUM OF AGREEMENT**  
444 **AMONG**  
445 **THE RURAL HOUSING SERVICE,**  
446 **MONTANA STATE HISTORIC PRESERVATION OFFICER,**  
447 **NATIONAL PARK SERVICE, AND**  
448 **ADVISORY COUNCIL ON HISTORIC PRESERVATION**

449  
450 **REGARDING THE**  
451 **NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING**  
452 **CONSTRUCTION DEVELOPMENT, GREAT FALLS, CASCADE COUNTY,**  
453 **MONTANA**  
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456 **CONCURRING PARTY 1 of \_\_\_\_\_:**  
457 **[insert name of concurring Party]**  
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463 \_\_\_\_\_ Date  
464 **[insert name and title]**  
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470 **MEMORANDUM OF AGREEMENT**  
471 **AMONG**  
472 **UNITED STATES DEPARTMENT OF AGRICULTURE RURAL HOUSING SERVICE,**  
473 **MONTANA STATE HISTORIC PRESERVATION OFFICER,**  
474 **ADVISORY COUNCIL ON HISTORIC PRESERVATION,**  
475 **NATIONAL PARK SERVICE,**  
476 **AND NEIGHBORWORKS GREAT FALLS**  
477 **FOR COMPLIANCE WITH SECTION 106**  
478 **OF THE NATIONAL HISTORIC PRESERVATION ACT**  
479 **REGARDING THE**  
480 **SECTION 523 MUTUAL SELF HELP HOUSING CONSTRUCTION DEVELOPMENT,**  
481 **GREAT FALLS, CASCADE COUNTY, MONTANA**  
482  
483

484 **WHEREAS,** the United States Department of Agriculture, (USDA) Rural Housing  
485 Service (RHS) is authorized to provide grant funding pursuant to Section 523 of the Housing Act  
486 of 1949 and Rural Development's Mutual Self-Help Housing Development Regulation 7 CFR  
487 1944, Subpart I, Mutual Self-Help Technical Assistance Grants; and  
488

489 **WHEREAS,** NeighborWorks Great Falls has requested a Mutual Self-Help Housing  
490 Technical Assistance Grant from the RHS to provide technical and supervisory assistance to  
491 low- and very-low income individuals and families as they construct their own single-family  
492 homes; and  
493

494 **WHEREAS,** the requested funding will be used by NeighborWorks Great Falls for  
495 Phases I and II of the planned development; and  
496

497           **WHEREAS**, NeighborWorks Great Falls (NWGF), plans to construct a multi-phase  
498 development on a ±123.8-acre site located on the south side of Great Falls, Montana, Cascade  
499 County, Montana (herein referred to as Project or Undertaking). The site is located in the  
500 southwest quarter of Section 19, Township 20 North, Range 3 East, latitude 47°28'13" and  
501 longitude -111°16'48;". The first phases of the Project consisting of approximately 62-acres will  
502 consist of residential housing that will be partially funded through USDA-Rural Development  
503 Mutual Self-Help Program (MSHP). Future phases will likely consist of mixed-use and  
504 residential housing development. The project will conform to the approved Master Plan per the  
505 attached Exhibit 1, Location Map and Area Of Potential Effect to this Memorandum of  
506 Agreement.;

507  
508           **WHEREAS**, if RHS elects to provide the requested funding, the proposed Project will be  
509 an undertaking subject to review under Section 106 of the National Historic Preservation Act  
510 (NHPA), 54 USC 306108, and its implementing regulations, 36 CFR Part 800; and

511  
512           **WHEREAS**, RHS has defined the undertaking's area of potential effect (APE) as the  
513 Great Falls Portage National Historic Landmark, Upper Portage (24CA238); and

514  
515           **WHEREAS** RHS has determined that the undertaking will have an adverse effect on the  
516 Great Falls Portage National Historic Landmark, Upper Portage (24CA238), National Historic  
517 Landmark (NHL) and the Lewis and Clark National Historic Trail (24CA1711)), and has  
518 consulted with the Montana State Historic Preservation Office (MT SHPO) and National Park  
519 Service (NPS) and Advisory Council on Historic Preservation (ACHP) pursuant to 36 CFR Part  
520 800; and

521  
522           **WHEREAS**, the RHS has notified the Secretary of the Interior (SOI) in accordance with  
523 36 C.F.R. § 800.10(c), and the National Park Service's (NPS) Regional Office Interior Region(s)  
524 [#] (NPS Regional Office), and the [Park unit] are representing the SOI, and have been invited to  
525 sign this Programmatic Agreement (PA) as an invited signatory, and that both the NPS Regional  
526 Office and [Park unit] will receive information and participate in consultations, and that the NPS  
527 Regional Office will be the signatory authority for NPS; and

528  
529           **WHEREAS**, in accordance with 36 CFR § 800.6(a)(1), RHS notified the ACHP of its  
530 adverse effect determination with specified documentation on October 24, 2023, and the ACHP  
531 responded on November 8, 2023 they had chosen to participate in the consultation pursuant to 36  
532 CFR § 800.6(a)(1)(iii);and

533  
534           **WHEREAS**, RHS has invited NWGF to sign this MOA as an Invited Signatory; and

535  
536           **WHEREAS**, the RHS, MT SHPO, and the ACHP are each a "Signatory," and the  
537 NWGF and the NPS are an "Invited Signatory" to the PA and, hereafter are "Signatories"; and

538  
539           **WHEREAS**, the RHS has determined the following Federally recognized tribes may  
540 have an interest in the undertaking and invited them to participate in the Section 106 consultation  
541 in letters dated March 23, 2023: Apache Tribe of Oklahoma, Blackfoot Tribe of the Blackfoot  
542 Indian Reservation of Montana, Crow Tribe of Montana, Fort Belknap Indian Community, and  
543 the Little Shell Tribe of Chippewa Indians; and

544  
545           **WHEREAS**, only the Little Shell Tribe of Chippewa Indians Tribe responded to the  
546 invitation, but did not participate in the consultation; and

547  
548           **WHEREAS**, RHS has consulted with the following parties regarding the effects of the  
549 undertaking on historic properties and has invited them to sign this MOA as concurring parties:  
550 The Lewis and Clark Trail Heritage Foundation, National Trust for Historic Preservation,  
551 Preserve Montana, Lewis and Clark Interpretive Center, City of Great Falls Historic preservation  
552 Officer (City HPO)), Portage Route Chapter of Lewis and Clark Trail Heritage Foundation,  
553 Lewis and Clark Interpretive Center Foundation, Great Falls Habitat for Humanity, Home  
554 Builders Association of Great Falls, Great Falls Housing Authority, Indian Family Health Clinic,  
555 Great Falls Development Authority, City of Great Falls (City) Planning and Community  
556 Development, Great Falls Chamber of Commerce, Cascade County Planning Department, Great  
557 Falls Montana Tourism Office; and

558  
559           **WHEREAS**, RHS has afforded members of the general public and other interested parties to  
560 participate in and comment on this undertaking in accordance with the public review process in 7  
561 CFR 1970.14 and 36 CFR 800.2(d)(1). A local newspaper advertisement was published on ----,  
562 2024, and -----, 2024, in the -----. The -----day comment period ended on -----, 2024.  
563 RHS received no comments; and

564  
565           **NOW, THEREFORE**, RHS, MT SHPO, ACHP, NPS, and NWGF agree that the  
566 undertaking shall be implemented in accordance with the following stipulations in order to take  
567 into account the effect of the undertaking on historic properties.

568  
569           **STIPULATIONS**

570  
571 RHS, in coordination with NWGF, shall ensure that the following measures are carried out:

572  
573           **III. ROLES AND RESPONSIBILITIES**

574  
575           The following sections outline the roles of the Signatories and participating consulting parties  
576 in the execution of this MOA:

- 577  
578           **A. RHS (Signatory) shall:**  
579           **4.** Provide annual reports from NWGF to the Signatories and Invited Signatories  
580 regarding progress and status of the MOA.  
581           **5.** Coordinate with NWGF to ensure deadlines outlined in the MOA are being met  
582 and notify Signatories and consulting parties if and when benchmarks cannot be  
583 met.  
584           **6.** Coordinate with NWGF to ensure that construction contracting documents shall  
585 include post-review discovery requirements provided in Stipulation 11,  
586 including contact names and telephone numbers for the RHS and MT SHPO,  
587 and that their construction contracts include the Inadvertent Discovery Plan  
588 provided in Exhibit\_\_\_.

- 589  
590           **B. MT SHPO (Signatory) shall:**  
591           **1.** Review and comment on submittals of draft mitigation materials, survey  
592 reports, and/or treatment plans, as relevant, in a timely manner (within 30  
593 calendar days).  
594           **2.** Consult regarding the need for additional identification and evaluation



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efforts.

3. Support through expertise successful completion of mitigation, preservation, and recordation efforts as outlined in the MOA.
4. Lewis and Clark NHT will provide support with subject matter expertise on the Lewis and Clark expedition. NPS IMR Heritage Partnerships Program will provide support via technical expertise on the National Historic Landmark.

**C. NPS (Signatory) shall:**

1. 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).
2. Consult regarding the need for additional identification and evaluation efforts.
3. Support through expertise successful completion of mitigation, preservation, and recordation efforts as outlined in the MOA.

**D. ACHP (Signatory) shall:**

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

**IV. MITIGATION**

**A. NWGF (Invited Signatory) shall**

11. Based on Exhibit 2, Master Plan, NWGF shall develop and implement a plan for a 9.5-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 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.
12. Establish and maintain the 30-foot easement along 33rd Ave S & 13th St S to facilitate public use and future connections. Provide a minimum 6-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.
13. Apply Development Standards, Exhibit 3, 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 will include a comprehensive night

641 sky-friendly lighting design plan for the entire development agreement for  
642 minimizing light pollution to protect the natural nighttime environment. These  
643 design guidelines will apply to all phases of the project is ultimately approved  
644 and enforced by the Development Agreement between NWGF and the City of  
645 Great Falls and will comply with City of Great Falls code requirements. These  
646 Development Standards shall be incorporated into the City of Great Falls  
647 Development Agreement and run with the land ensuring future phases meet all  
648 requirements.

- 649
- 650 14. Collaborate with the City of Great Falls to create a City Development  
651 Agreement that incorporates all elements of this MOA. This agreement will  
652 define the roles and responsibilities of all parties involved in the project,  
653 including monitoring and enforcement mechanisms.
- 654
- 655 15. Based on recommendations provided by the NPS, use the completed Viewshed  
656 Analysis, Exhibit 4, to identify scenic views within the project area and  
657 implement measures to preserve and enhance these views in the Master Plan.
- 658
- 659 16. Work with the local historical preservation groups and Lewis and Clark entities  
660 to design and expand the story and interpretation currently found in the portage  
661 route. Examples might include funding or match opportunities, trail or overlook  
662 site improvements, signage and wayfinding expansion, GIS Data tools,  
663 mapping, and interactive apps.
- 664
- 665 17. NWGF will prepare Level I Historic American Landscape Survey (HALS)  
666 documentation of the Great Falls Portage NHL. The documentation will be  
667 prepared in accordance with the Secretary of the Interior’s Standards and  
668 Guidelines for Architectural & Engineering Documentation. Prior to the  
669 construction, NWGF will document landscape characteristics as specified by  
670 the standards outlined in NPS guidance documents: Historic American  
671 Landscapes Survey Guidelines for Historic Reports and the NPS-prepared  
672 SOD. The submittal will include written, graphic, and photographic  
673 documentation and measured drawings packaged and submitted as per the  
674 SOD included as Exhibit 5 to this MOA. NWGF will provide copies of the  
675 documentation to the RHS and the RHS will provide the copies to the  
676 Signatories, except for the ACHP, and to the following repositories: the MT  
677 SHPO; and the National Park Service/Library of Congress.
- 678
- 679 18. NWGF will coordinate with the MT SHPO and \_\_\_\_ to ensure the following public  
680 interpretation measures are implemented to share the results of Stipulation IV.B  
681 and the unique stories of the Great Falls Portage NHL and national Historic Trail  
682 with the public.
- 683 1. list topics interpretation would cover;
- 684 2. a range of how many signs, One large enough panel could cover multiple subjects and feature QR  
685 codes to further information;
- 686 3. If QR codes, to what website? An established, maintained site is preferable.

- 687                   4. Describe generally where would any signs be installed, i.e. in conjunction with views, or paths
- 688
- 689       19.       NWGF shall coordinate with the NPS to minimize adverse effects to the prairie
- 690               landscape setting by using appropriate native vegetation for landscaping and by
- 691               avoiding the use of invasive species in accordance with Master Plan.
- 692
- 693       20.       NWGF shall ensure all construction contracts include the Inadvertent Discovery Plan
- 694               provided in Exhibit 6 and their contractors are familiar with and abide by those
- 695               requirements.
- 696

697       **PROFESSIONAL QUALIFICATIONS AND STANDARDS**

- 698
- 699       A.       Professional Qualifications. Pursuant to Section 112(a)(1)(A) of the NHPA (54
- 700               USC §306131(a)(1)(A)) and 36 CFR § 800.2(a)(1), RHS shall ensure that all
- 701               technically critical activities carried out pursuant to this MOA will be conducted by
- 702               or under the direct supervision of appropriate historic preservation professionals
- 703               meeting the Federal qualifications in the discipline appropriate to various activities
- 704               required under this MOA. Pertinent references are the Secretary of the Interior’s
- 705               Professional Qualifications Standards published in 48 Federal Register (FR) 44738–
- 706               44739 (1983) and 36 CFR Part 61, Appendix A (1998)).
- 707
- 708       B.       Standards and Guidelines. All activities carried out pursuant to this MOA shall
- 709               align, as applicable, with the Secretary of the Interior’s Standards and Guidelines for
- 710               Archeology and Historic Preservation (48 Federal Register 44716 – 44742,
- 711               September 23, 1983) and the Secretary of the Interior’s Standards for the Treatment
- 712               of Historic Properties (36 CFR Part 68; 60 Federal Register 35,842 – 35,844, July
- 713               12, 1995) and the ACHP’s current Policy Statement On Burial Sites, Human
- 714               Remains, And Funerary Objects, March 1, 2023.

715

716       **POST-REVIEW DISCOVERIES**

717       If during the course of any ground disturbance related to any portion of the Project, any post

718       review discovery, including but not limited to, any artifacts, foundations, or other indications of

719       past human occupation of the area are uncovered, NWGF Great Falls shall ensure protection by

720       complying with 36 CFR § 800.13(b)(3) and (c) in accordance with the Inadvertent Discovery

721       Plan provided in Exhibit 6.

722

723       **MONITORING AND REPORTING**

724       Every year, within 30 calendar days of the date of the final signatory’s execution of this

725       MOA, NWGF Great Falls shall provide to all Signatories a written report regarding the

726       actions taken to fulfill the terms of the agreement. RHS shall file a copy with the ACHP per

727       36 CFR § 800.6(b)(iv). Such report shall include status updates on construction and

728       mitigation activities, summary of ?as relevant, any scheduling changes proposed, any

729       problems encountered, and any disputes and objections received in efforts to carry out the

730 terms of this MOA. Such reporting shall cease when the terms of the MOA have been  
731 fulfilled or upon agreement of the Signatories.

732  
733 **DISPUTE RESOLUTION**

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

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

752  
753 **AMENDMENTS**

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

757  
758 **TERMINATION**

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

764  
765 Once the MOA is terminated, and prior to work continuing associated with the development of  
766 the subject property, RHS must either (a) execute another MOA pursuant to 36 CFR § 800.6 or  
767 (b) request, consider, and respond to the comments of the ACHP under 36 CFR § 800.7. RHS  
768 will notify the Signatories as to the course of action it will pursue.

769  
770 **EFFECTIVE DATE AND DURATION**

771 This MOA shall be effective on the date the last Signatory has affixed their signature. The  
772 MOA will expire if its terms are not carried out within 5 years from the date of its execution.

773 Prior to such time, the Signatories may consult to reconsider the terms of the MOA and amend  
774 it in accordance with Stipulation VIII above.

775  
776 **SIGNATURES**

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

783  
784 **GENERAL PROVISIONS**

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

791  
792 **EXECUTION** of this MOA by the RHS, MT SHPO, ACHP, NPS, and NWGF and  
793 implementation of its terms evidence that RHS has taken into account the effects of this  
794 undertaking on historic properties and afforded the ACHP an opportunity to comment.

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**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, CASCADE COUNTY,  
MONTANA**

SIGNATORY 1 of 3

**Advisory Council on Historic Preservation**

\_\_\_\_\_ Date  
**Reid Nelson**  
**Executive Director**

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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, CASCADE COUNTY,  
MONTANA**

SIGNATORY 2 of 3

**Rural Housing Service**

\_\_\_\_\_ Date  
**Rob Nelson**  
**Assistant Director, Program Support Services**  
**USDA Rural Development**

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**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, CASCADE COUNTY,  
MONTANA**

SIGNATORY 3 of 3

**Montana State Historic Preservation Officer**

\_\_\_\_\_ Date  
**Pete Brown, State Historic Preservation Officer**



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**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, CASCADE COUNTY,  
MONTANA**

INVITED SIGNATORY 1 of 2

**National Park Service**

\_\_\_\_\_ Date  
**[insert name and title]**

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**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, CASCADE COUNTY,  
MONTANA**

**INVITED SIGNATORY 2 of 2:**

**Neighborworks Great Falls**

\_\_\_\_\_  
**Sherrie Arey, Executive Director**      Date

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**MEMORANDUM OF AGREEMENT  
AMONG  
THE RURAL HOUSING SERVICE,  
MONTANA STATE HISTORIC PRESERVATION OFFICER,  
NATIONAL PARK SERVICE, AND  
ADVISORY COUNCIL ON HISTORIC PRESERVATION**

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NEIGHBORWORKS GREAT FALLS' SECTION 523 MUTUAL SELF HELP HOUSING  
CONSTRUCTION DEVELOPMENT, GREAT FALLS, CASCADE COUNTY,  
MONTANA**

**CONCURRING PARTY 1 of \_\_\_\_\_:  
[insert name of concurring Party]**

\_\_\_\_\_ Date  
**[insert name and title]**

# Exhibit 1 Location Map



## Exhibit 2: Master Plan Preferred Alternative - Enhanced View Corridor

### On-Site Minimization/Mitigation Efforts

- Approximately 9.5 acre park with amenities including path/walkways, viewing pavilion, multi-purpose field
- Enhanced view corridor at northwest corner of site to open view of natural landscape to the south
- ±30-foot dedicated easement on north and west side of property for ±10-foot meandering pedestrian path with interpretive signs and view points
- Protected ±120-foot wide view corridor running east to west through site (includes street right-of-way)
- Native-type landscape design at park and pedestrian easements
- Development Standards that include regulations related to design of site including height standards, outdoor lighting, signage, etc.



### LEGEND

- Zone 1 - Limited Structure Zone
- Zone 2 - View Corridor Residential
- Zone 3 - Residential with Height Restrictions (Phase 1 and 2)
- Zone 4 - Future Residential, Mixed-Use, with Height Restrictions (Future Phases)
- Primary Roadway (Arterial)
- Secondary Roadway
- Pedestrian Connection with Interpretive Elements
- Protected Viewshed
- Proposed Interpretive Sign Locations

**DRAFT**

# **Highland Development**

## **PUD Zoning District Development Standards**

**Version 1: January 25, 2024**

**Version 2: February 27, 2024**

**Version 3: May 1, 2024**

## **1.00 Zoning Districts**

The information below describes the various zoning districts permitted in the Highland Development PUD. Some of the districts may share similar characteristics, but they possess one (1) or more uniquely different qualities that allow a distinction to be drawn between them. Although an area may not now possess each of the attributes in these descriptions, it is intended that as uses change over time they more closely reflect the intended uses. Uses are allowed in the various districts consistent with the development standards in Title 17 of the City of Great Falls Land Development Code and development limitations that may be present, including steep slopes, floodplains, wetlands, riparian areas, and other environmentally sensitive areas.

**Zone 1 – Limited Structure Zone.** The intent of this zone is to provide a view corridor within and through the development that preserves the Great Falls Portage National Historic Landmark, Lower Portage. Park and playground uses with low structures as well as street and utility infrastructure including wayfinding signage is permitted in this zone, any built structures shall be considered a conditional use requiring approval by the City prior to installation and are limited to 16-foot maximum height in order to protect the view corridor.

**Zone 2 – View Corridor Residential.** The intent of this zone is to allow single story residential housing height limitations, height is limited to a maximum 21-feet.

**Zone 3 – Residential with Height Restrictions.** The intent of this zone is to allow two story residential, that has a height limitation of 35-feet.

**Zone 4 – Future Residential, Mixed-Use with Height Restrictions.** The intent of this zone is to allow single-family, multi-family or mixed-use development that has a height limitation of 45-feet.

**Table 1.00-1. Development Standards**

<b>TABLE 1.00-1 Development Standards</b>				
<b>Standard</b>	<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3</b>	<b>Zone 4</b>
Residential density*	0	-	-	-
Minimum lot size for newly created lots		5625	5625	
Minimum lot width for newly created lots		45'	45'	
Maximum building height of principal building	16'	21'	35'	45'
Maximum building height of other accessory buildings	12'	21'; not higher than principal structure	24'; not higher than principal structure	24'; not higher than principal structure
Minimum front yard setback	N/A	20'; lots that are 125' or less deep 15' permitted	20'; lots that are 125' or less deep 15' permitted	20'; lots that are 125' or less deep 15' permitted
Minimum side yard setback	N/A	6'	6'	6'

<b>TABLE 1.00-1 Development Standards</b>				
<b>Standard</b>	<b>Zone 1</b>	<b>Zone 2</b>	<b>Zone 3</b>	<b>Zone 4</b>
Minimum rear yard setback	N/A	10 feet for lots less than 150 feet in depth; 15 feet for lots 150 feet in depth and over	10 feet for lots less than 150 feet in depth; 15 feet for lots 150 feet in depth and over	10 feet for lots less than 150 feet in depth; 15 feet for lots 150 feet in depth and over
Maximum lot coverage of principal and accessory buildings*		Corner lot: 55% Other types: 50%	Corner lot: 70% Other types: 60%	City Code* Based on use type refer to 17.20.4 Exhibit 20-4
Fence Heights	Not Permitted	Not Permitted in Front Yard; 6-foot max height Rear Yard	4-foot max height Front Yard; 6-foot max height Rear Yard	City Code* <i>Refer to 17.20.7.040</i>
Light Poles	21'	Not taller than principal structure	Not taller than principal structure	Not taller than principal structure
Light Pollution <i>Refer to Code of Ordinances Title 17 Chapter 40 Outdoor Lighting</i>	City Code*	City Code*	City Code*	City Code*
Color Palette	Earthtones	Earthtones	Earthtones	Earthtones
Recreational Vehicle Parking	Not Permitted	City Code; Not Permitted on Street	City Code* Refer to 10.9.310	City Code* Refer to 10.9.310
Landscaping	City Code; Natural Landscaping, where permitted	City Code* Refer to 17.44.2	City Code* Refer to 17.44.2	City Code* Based on use refer to 17.44.2 or 17.44.3
Signage	Signage to be developed with City of Great Falls and Lewis and Clark experts that compliment the interpretive signage to be included on project, including street naming privileges, color and design features			

\*References in table to City Code refer to the Official Code of the City of Great Falls specific sections that apply are noted.



# Highland Development

## Visual Assessment

DRAFT 1 Issued: January 3, 2024  
FINAL Issued: May 1, 2024



**NeighborWorks**  
**GREAT FALLS**

Prepared by TD&H Engineering





# Contents

**01** Introduction/Background

**02** Method of Analysis

**03** Assessment Results



# 01

## Introduction/Background

---

The National Park Service (NPS) and Montana State Historic Preservation Office (MT SHPO) have raised concerns regarding potential visual impacts of the proposed Highland Development Project (hereafter "Project") on the Great Falls Portage National Historic Landmark, Lower Portage (24CA238) (hereafter "Landmark"). Due to these concerns this analysis was performed to support review under the National Environmental Policy Act (NEPA) and to help identify potential effects on historic sites for compliance with Section 106 of the National Historic Preservation Act. This report presents information collected and analyses performed to evaluate these concerns.

### Background

#### PROJECT DESCRIPTION

NeighborWorks Great Falls (NWGF) proposes to develop approximately 60 acres of a ±123.8 acre site on the south side of Great Falls, Montana, in Cascade County. The proposed Project consists of phased development of single-family residential housing through NWGF's USDA-Rural Development Mutual Self-Help Program (MSHP). The MSHP awards grant funds to eligible national and regional nonprofit organizations and consortia to purchase home sites and develop or improve the infrastructure needed for low-income recipient homeownership programs.

The Project is located in the southwest quarter of Section 19, Township 20 North, Range 3 East, latitude 47°28'13" and longitude -111°16'48 (**See Figure 1: Project Location Map**). The Project will be developed in two phases. Phase I includes developing the property to accommodate approximately 90-110 single-family residences over 10 years. Phase 2 includes property development to support approximately 90-130 single-family homes and potential multi-family development over the following 10 years. It is the intent that additional homes will occupy this subdivision as partnerships or other opportunities arise. As phases are completed, they will be annexed into the City of Great Falls. **See Figure 2: Highland Conceptual Development Plan.**

#### PROJECT TIMELINE

In summer 2022, Mitzi Rossillon, Consulting Archeologist, LLC, completed a Cultural Resource Inventory and Evaluation of the Project. This inventory noted three historic sites in the property inventory area including Great Falls Portage National Historic Landmark (24CA238), Lewis and Clark National Historic Trail Great Falls Portage (24CA1711) and an apparent Lewis and Clark anniversary celebration site (24CA1931) which was deemed insignificant. The associated survey report was submitted to Montana State Historical preservation Office (SHPO) by USDA Rural Development on October 31, 2022. On November 10, 2022, Laura Evilsizer (former Compliance Officer, Archeologist, Deputy SHPO) responded with a letter that included a notice of adverse impact. Official 106 Consultation for the project began on July 13, 2023. Consultation meetings with consulting parties have occurred on July 13, 2023, August 10, 2023, September 21, 2023, October 26, 2023, and December 14, 2023. During the meetings a request was made by the National Park Service for a Visual Assessment (hereafter "Assessment") to determine visual impacts of the proposed development on the Landmark. NeighborWorks hired TD&H Engineering (TD&H) to develop the Visual Assessment on their behalf.

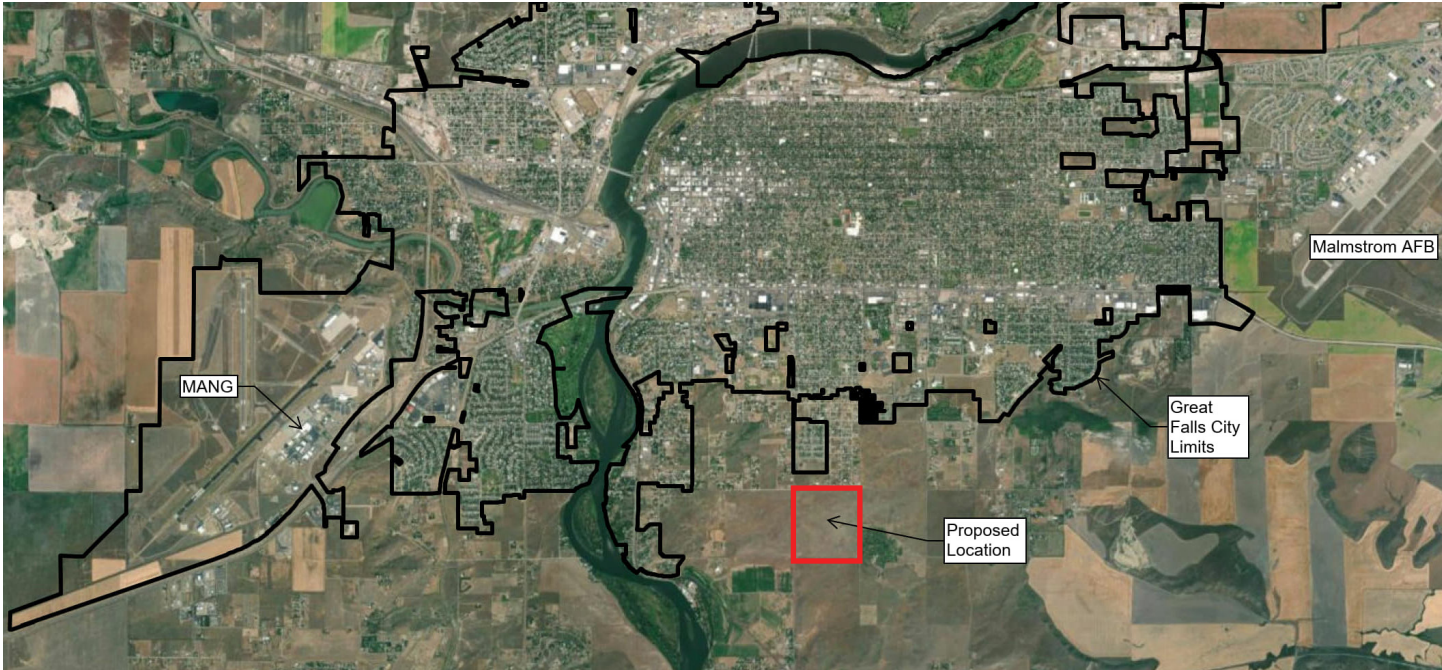


Figure 1. Project Location Map

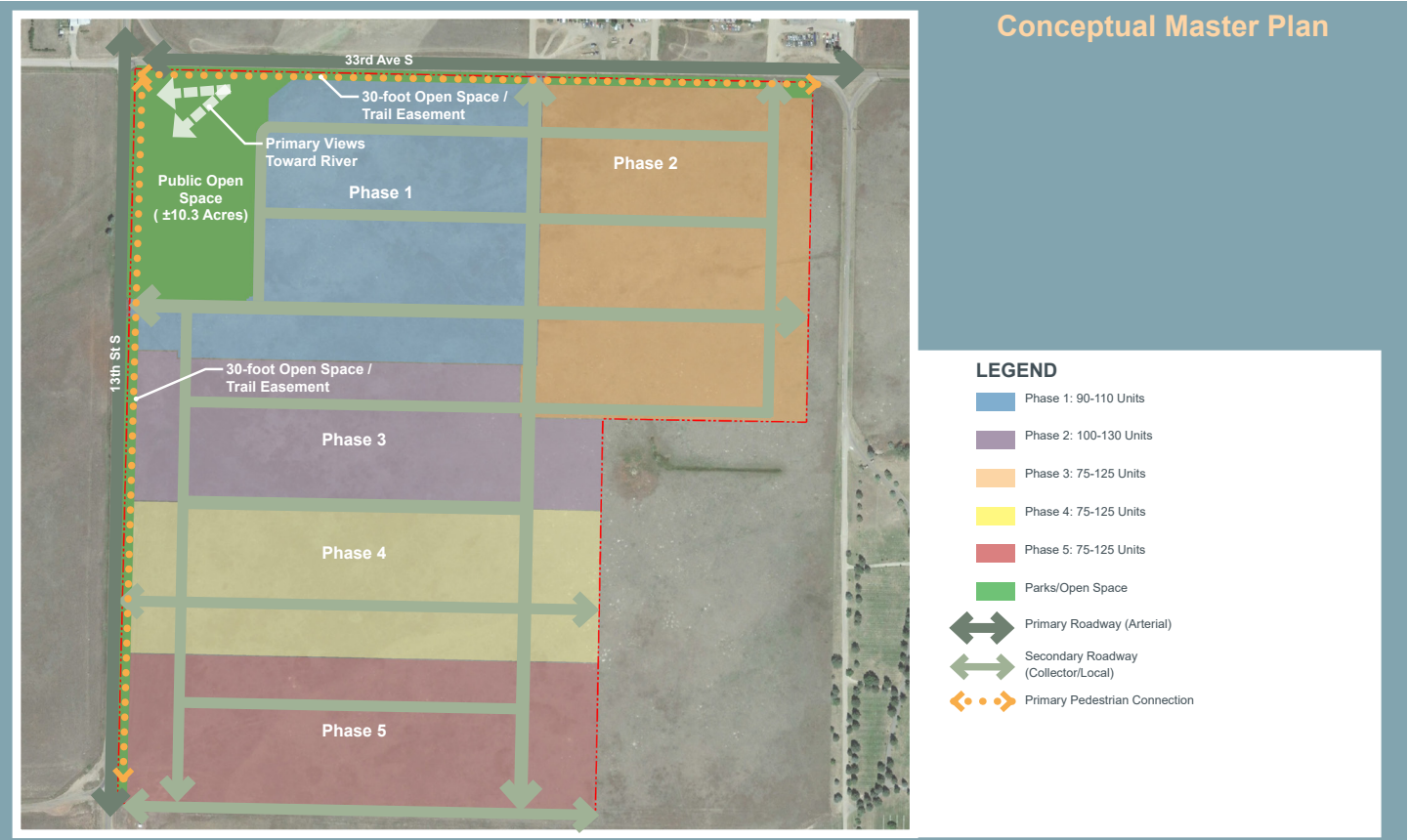


Figure 2. Highland Conceptual Development Plan

# 02 Method of Analysis

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On September 29, 2023, TD&H met with the NPS and outlined an approach for the Visual Assessment. The Assessment was requested to include three components as described below:

## 1. Visual Resource Inventory

- a. Assessment of the visual quality and scenic importance of various viewpoints in the landscape around the Landmark.
- b. Eleven viewpoints were provided by NPS as a KMZ file from Google Earth™ to TD&H on October 25, 2023 for use in the Visual Analysis. See **Figure 3: Visual Resource Analysis Viewpoints**.
- c. Determination of importance will be conducted by various parties after the Assessment is completed.

## 2. Visual Simulations

- a. Development of a three-dimensional model of the proposed development to show what the development would look like from certain observation points.
- b. TD&H developed a three-dimensional model of the Project using Autodesk InfraWorks®. Once the model was developed TD&H took eleven project still shots from the Visual Resource Inventory viewpoints provided by NPS to show what the development would look like from these observation points. Visual simulations and InfraWorks imagery of the viewpoints were developed and are provided in this report.

## 3. Viewshed Analysis:

- a. TD&H analyzed visibility of the Highland Development footprint at heights of 0.5 ft, 15 ft, and 25 ft, using ESRI© ArcPro™ Visibility (Spatial Analyst) geoprocessing tool with a frequency analysis type, 1.6 m surface offset, and observer offsets of 4.572 m, 7.62 m, and 0.1524 m. Digital Elevation Model from USGS 3DEP 1/3 Arc-Second elevation products downloaded in geotiff format, file n48w112 20210607 published 11/16/2021.
- b. The Visibility tool requires input of points or lines representing the Project. The proposed developable area was outlined into a box and given three consistent structure heights including 0.5-feet to represent existing conditions, 15-feet to represent a single-story structure and 25-feet to represent a two-story structure. A surface offset of 1.6 meters was used to account for observer height. The areas proposed to be dedicated at parkland within the project boundary was excluded from the offset area. Visual Analysis information is provided later in the report.

# 03 Assessment Results

## VISUAL RESOURCE INVENTORY

The National Park Service provided eleven viewpoints as a KMZ file from Google Earth™ to TD&H on October 25, 2023 for use in the Visual Analysis. See **Figure 3: Visual Resource Analysis Viewpoints**. TD&H took existing photographs of eight of the eleven viewpoints to capture the existing viewshed of each site. TD&H did not have permission to access private property so the sites that were not photo documented included 2. Historic Route – Private Property North, 5. Historic Route – Private Property South and 7. Private Property East. See **Appendix A – Existing Visual Resource Inventory Viewpoint Photographs**. Determination of importance will be conducted by various parties after the Visual Analysis is completed.



Figure 3. Visual Resource Inventory Viewpoints Map.



## VISUAL SIMULATIONS

Final layout of the Highland subdivision has not been developed. In order to develop project Visual Simulations a proposed layout of the project was developed. This layout was then developed into a 3D model in InfraWorks. **Figure 4. Highland Conceptual Master Plan** is the conceptual design for the project that was utilized in the Visual Simulations. Note that an area of additional residential density, which could be multi-family housing, duplexes or similar, was include as an option for the project to fully demonstrate potential visual impacts. The heights of the structures were limited to 15 and 25-feet to correlate with the Viewshed Analysis. Final layout and design of the subdivision is subject to change, with the understanding that the development must meet all 106 Consultation requirements for current and future phases.

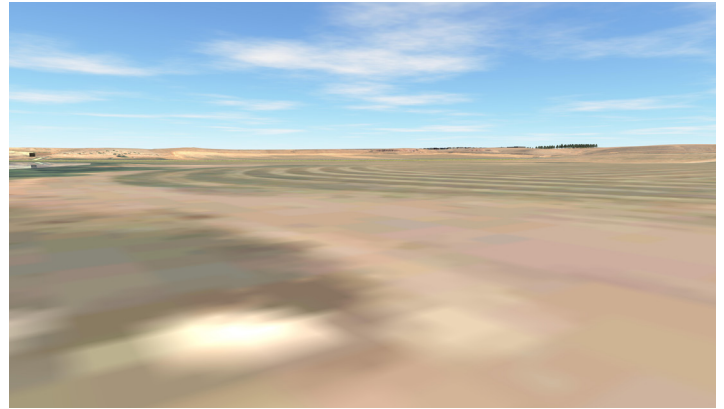


Figure 4. Highland Conceptual Master Plan.

## Viewpoint 1 Simulation: Upper Portage Camp



Viewpoint 1: Upper Portage Camp - Existing Photograph



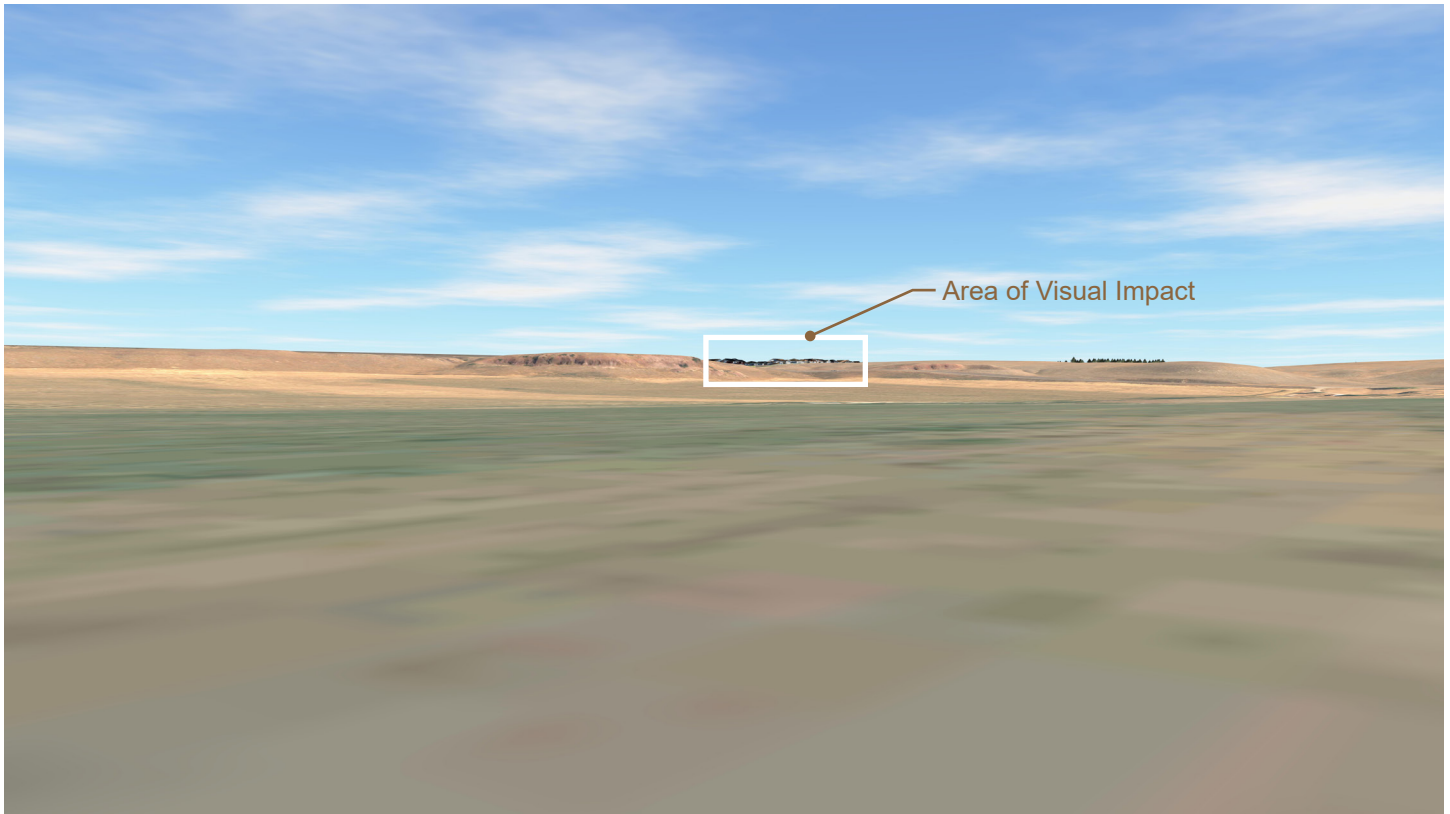
Viewpoint 1: Upper Portage Camp - InfraWorks Model



Viewpoint 1: Upper Portage Camp - Simulation

## Viewpoint 2 Simulation: Historic Route - Private Property South

TD&H did not have permission to access private property, therefore existing images were not able to be captured. Below is the InfraWorks model view from Viewpoint 2.



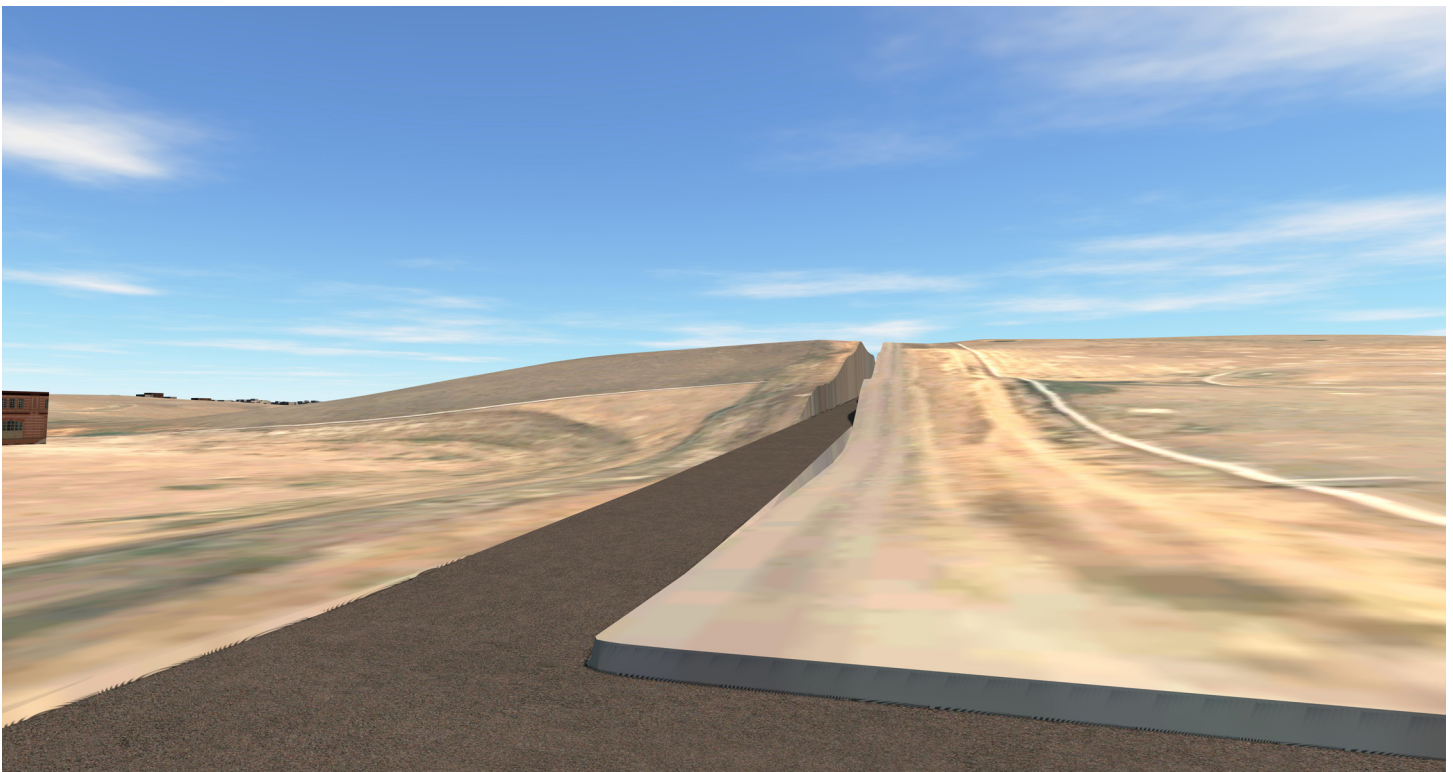
**Viewpoint 2: Historic Route - Private Property South**

## Viewpoint 3 Simulation: L&C Portage Route Overlook

The proposed development is not visible from Viewpoint 3, it will also not be visible from Viewpoint 3 post development.



Viewpoint 3: L&C Portage Route Overlook - Existing Photograph

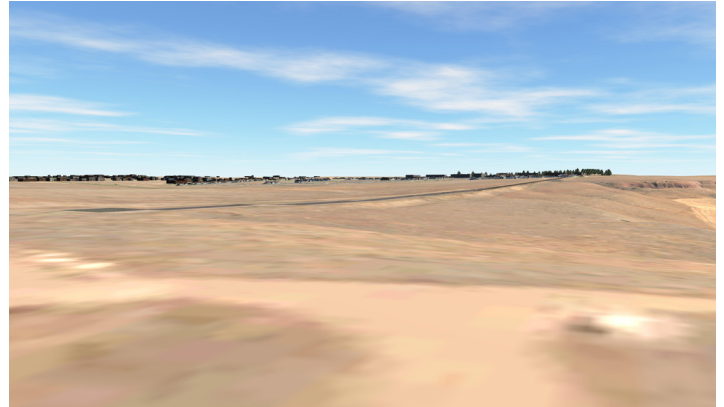


Viewpoint 3: L&C Portage Route Overlook - InfraWorks Model

## Viewpoint 4 Simulation: L&C Portage Route Overlook



Viewpoint 4: L&C Portage Route Overlook - Existing Photograph



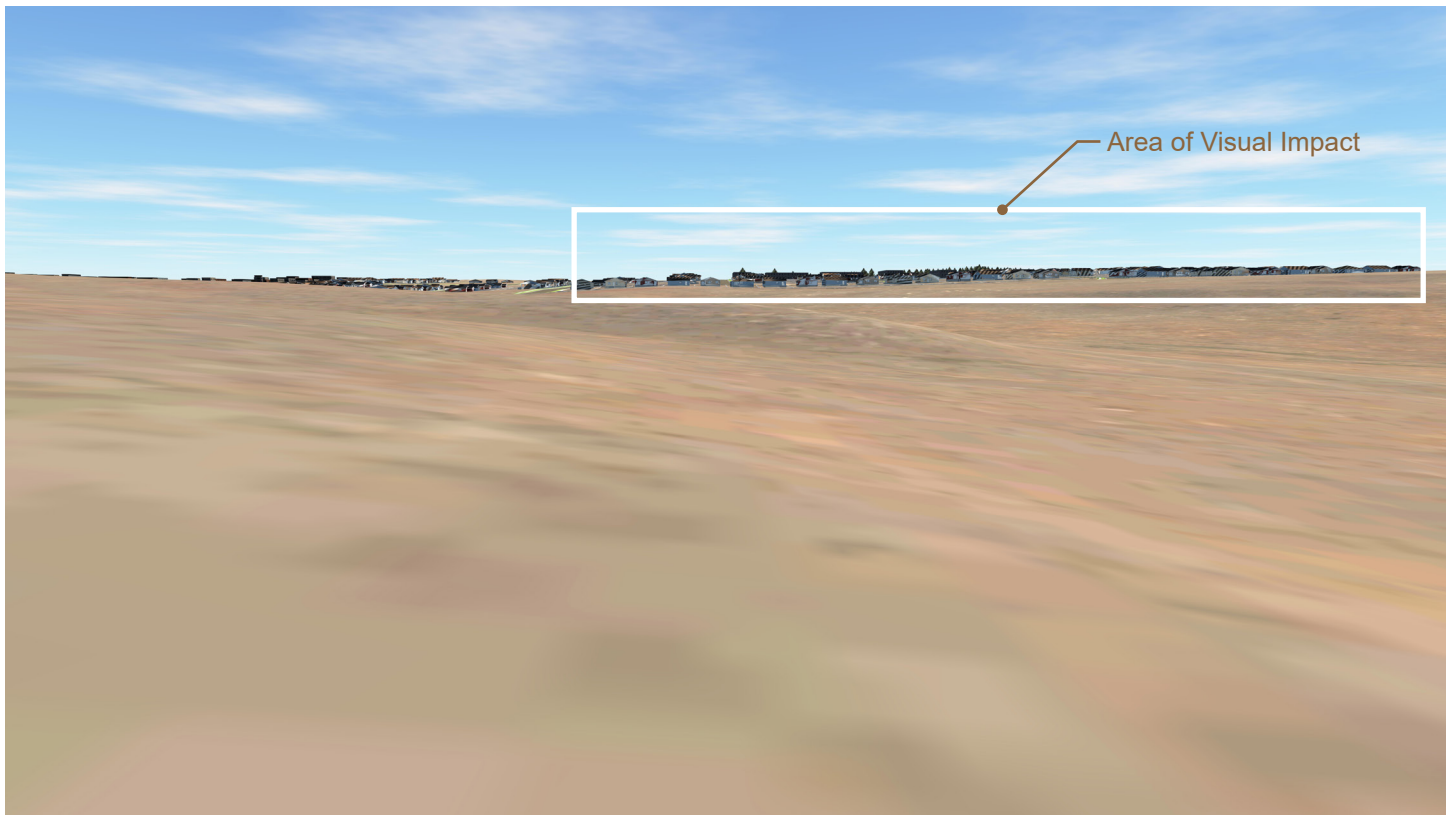
Viewpoint 4: L&C Portage Route Overlook - InfraWorks Model



Viewpoint 4: L&C Portage Route Overlook - Simulation

## Viewpoint 5 Simulation: Historic Route - Private Property North

TD&H did not have permission to access private property, therefore existing images were not able to be captured. Below is the InfraWorks model view from Viewpoint 5.



Viewpoint 5: Historic Route - Private Property North - InfraWorks Model

## Viewpoint 6 Simulation: SW Corner



**Viewpoint 6: SW Corner - Existing Photograph**



**Viewpoint 6: SW Corner - InfraWorks Model**



**Viewpoint Location Map**



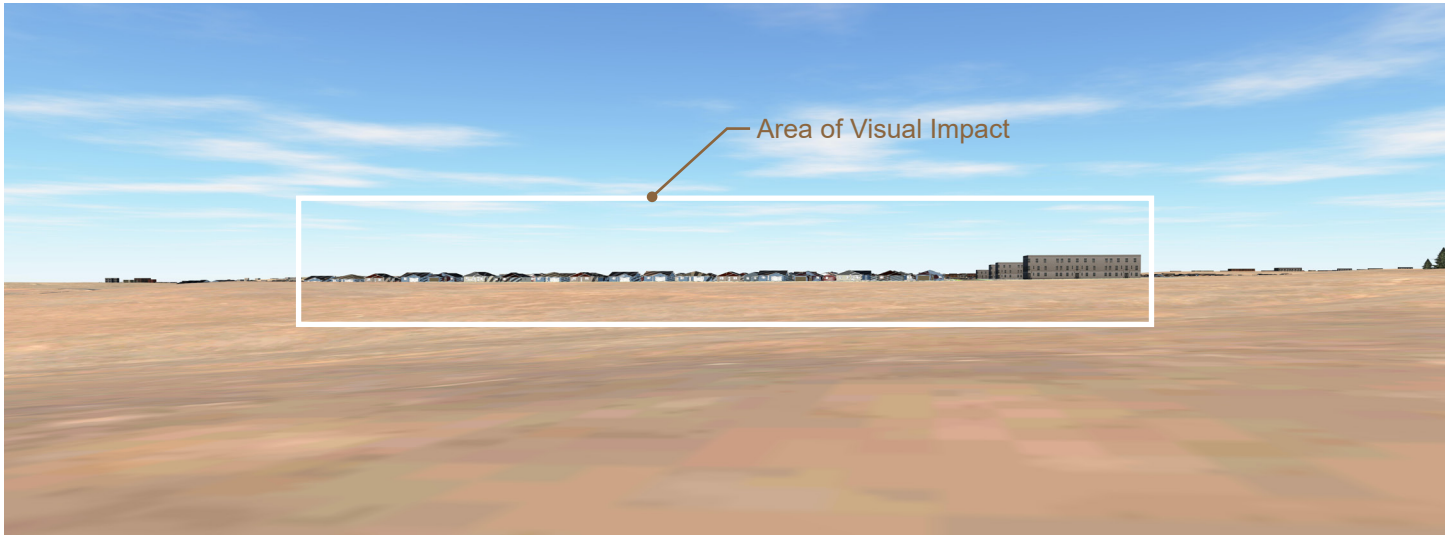
**Viewpoint 6: SW Corner - Existing Photograph  
view to West toward L&C Overlook**



**Viewpoint 6: SW Corner - Existing Photograph  
view to Southwest toward Missouri River**

## Viewpoint 7 Simulation: Historic Route - Private Property East

TD&H did not have permission to access private property, therefore existing images were not able to be captured. Below is the InfraWorks model view from Viewpoint 7.



Viewpoint 7: Historic Route - Private Property East - InfraWorks Model

## Viewpoint 8 Simulation: Historic Route - NW Corner



Viewpoint Location Map



Viewpoint 8: Historic Route - NW Corner - Existing Photograph view to South



Viewpoint 8: Historic Route - NW Corner - Existing Photograph view to Southwest toward L&C Overlook



## Viewpoint 8 Simulation: Historic Route - NW Corner



Viewpoint 8: Historic Route - NW Corner - Existing Photograph

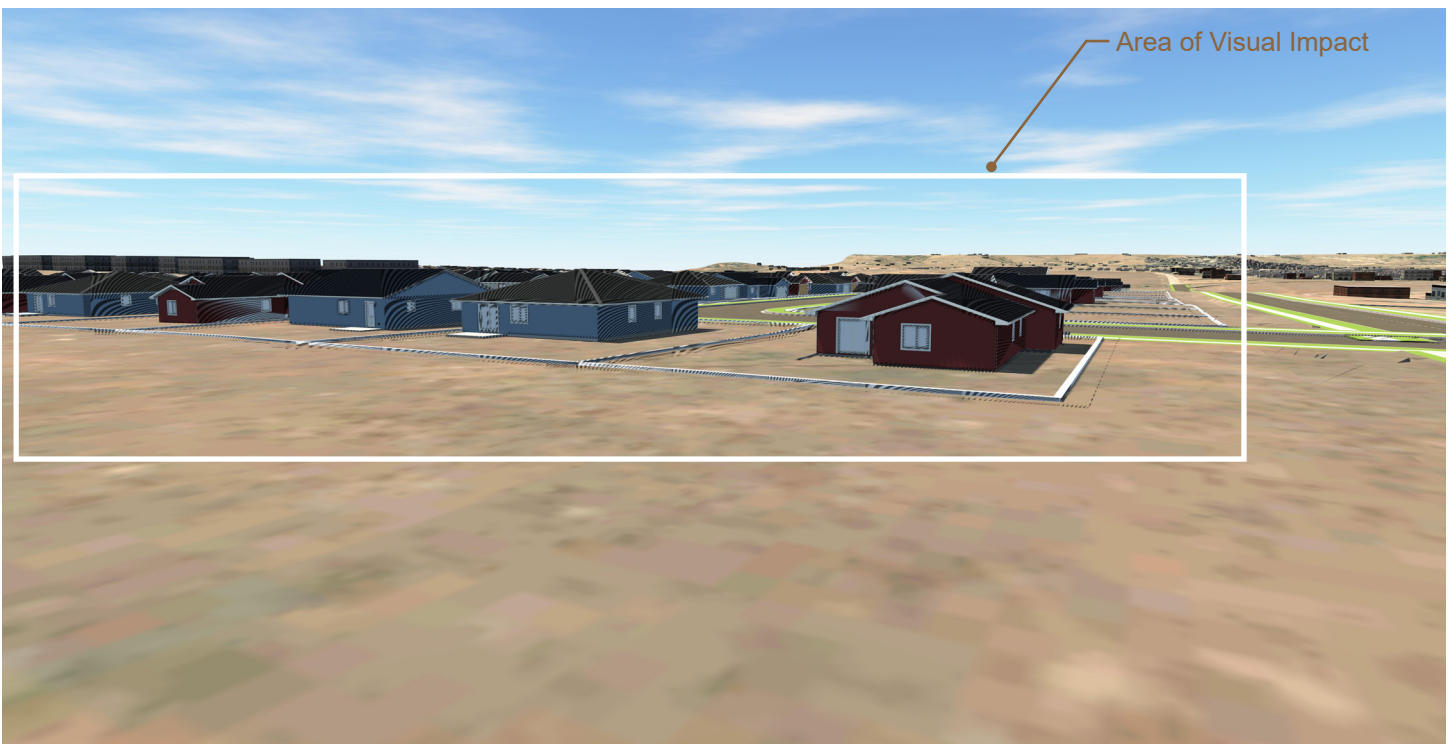


Viewpoint 8: Historic Route - NW Corner - Simulation

## Viewpoint 9 Simulation: Great Falls Upper Portage HPHS



Viewpoint 9: Great Falls Upper Portage HPHS - Existing Photograph

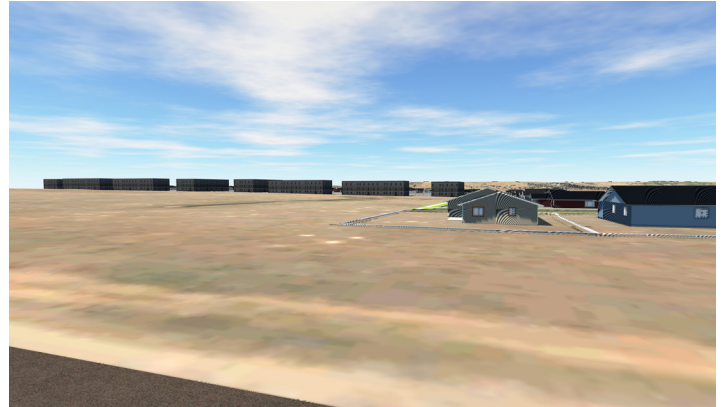


Viewpoint 9: Great Falls Upper Portage HPHS - InfraWorks Model

## Viewpoint 10 Simulation: Highland Cemetery Access Road



Viewpoint 10: Highland Cemetery Access Road - Existing Photograph



Viewpoint 10: Highland Cemetery Access Road - InfraWorks Model

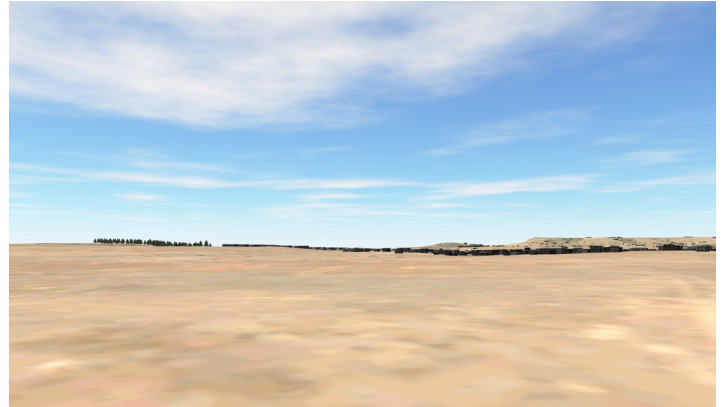


Viewpoint 10: Highland Cemetery Access Road - Simulation

## Viewpoint 11 Simulation: NE NHL



Viewpoint 11: NE NHL - Existing Photograph



Viewpoint 11: NE NHL - InfraWorks Model



Viewpoint 11: NE NHL - Simulation

## VIEWSHED ANALYSIS

Results of the analysis are shown in the following Figures. Different colors identify how potentially visible the Project will be from the various viewpoints provided by NPS. The lighter shades of cream represent areas that the Project is less visible while the dark shades of red/brown indicate the areas of the Project that are more visible. The Viewshed Analysis was run at three different Project heights, the first at 0.5-feet to represent existing conditions, the second at 15-feet to represent a single-story structure across the entire project and the third at 25-feet to represent a two-story structure across the entire project. These are the anticipated heights of the proposed Project structures.

Generally, when comparing the existing (0.5-foot height) conditions to the proposed Project heights of 15-and 25-feet the Project will potentially be more visible than existing conditions. Visibility of the Project decreases with distance from the Project. The Project is more visible from the north, northeast, east, west and northwest. The Project generally has more limited visibility from the southeast, south and southwest. Increased heights of one (15-feet) to two (25-feet) stories does have an effect on the visibility of the entire Project.

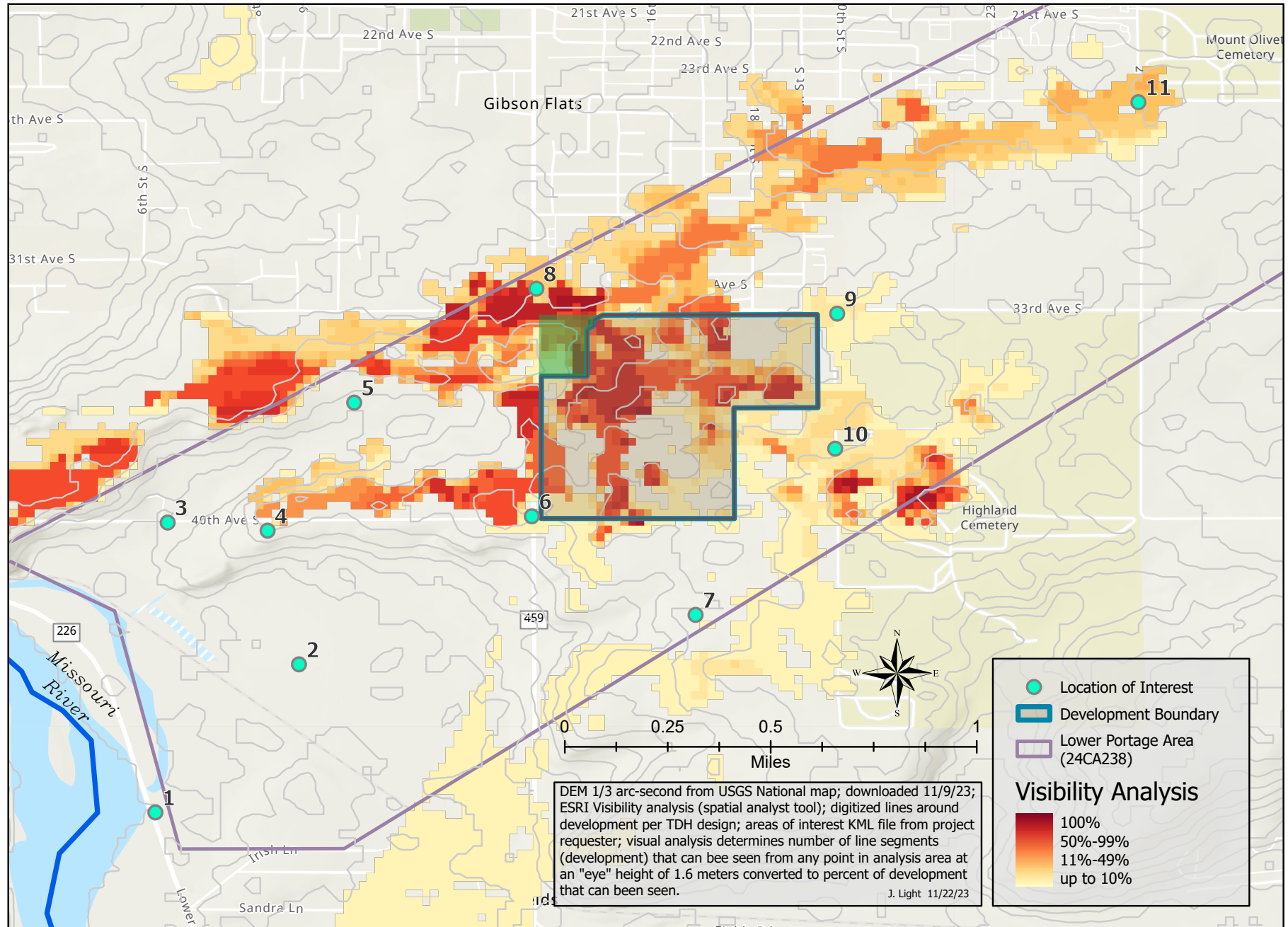
The Project's perceived visual dominance at a given location would be affected by distance, location relative to other human-made features, and presence of topographic barriers precluding visibility. Several existing human-made structures and facilities are located in close proximity to the Project, the most notable of which is that the City of Great Falls city limits are just north, northeast and northwest of the Project. Development has already occurred in these areas causing and existing adverse visual impact to the Landmark.

Potential for adverse effects of the proposed Project on the Landmark should be considered in the context of existing humanmade features and non-historic changes to the setting and feeling of the Landmark and surrounding lands. Very few if any areas outside the Project footprint would offer views of only the Project without views of the existing humanmade elements surrounding the project. When viewing the Project from viewpoints most near the Project (Viewpoints 6, 8, 9, & 10) the Project would have a greater adverse effect on the Landmark viewshed. When viewing the Project from more distant viewpoints (Viewpoints 1, 2, 3, 4, 5, 7, & 11) the Project adverse impact is significantly less.

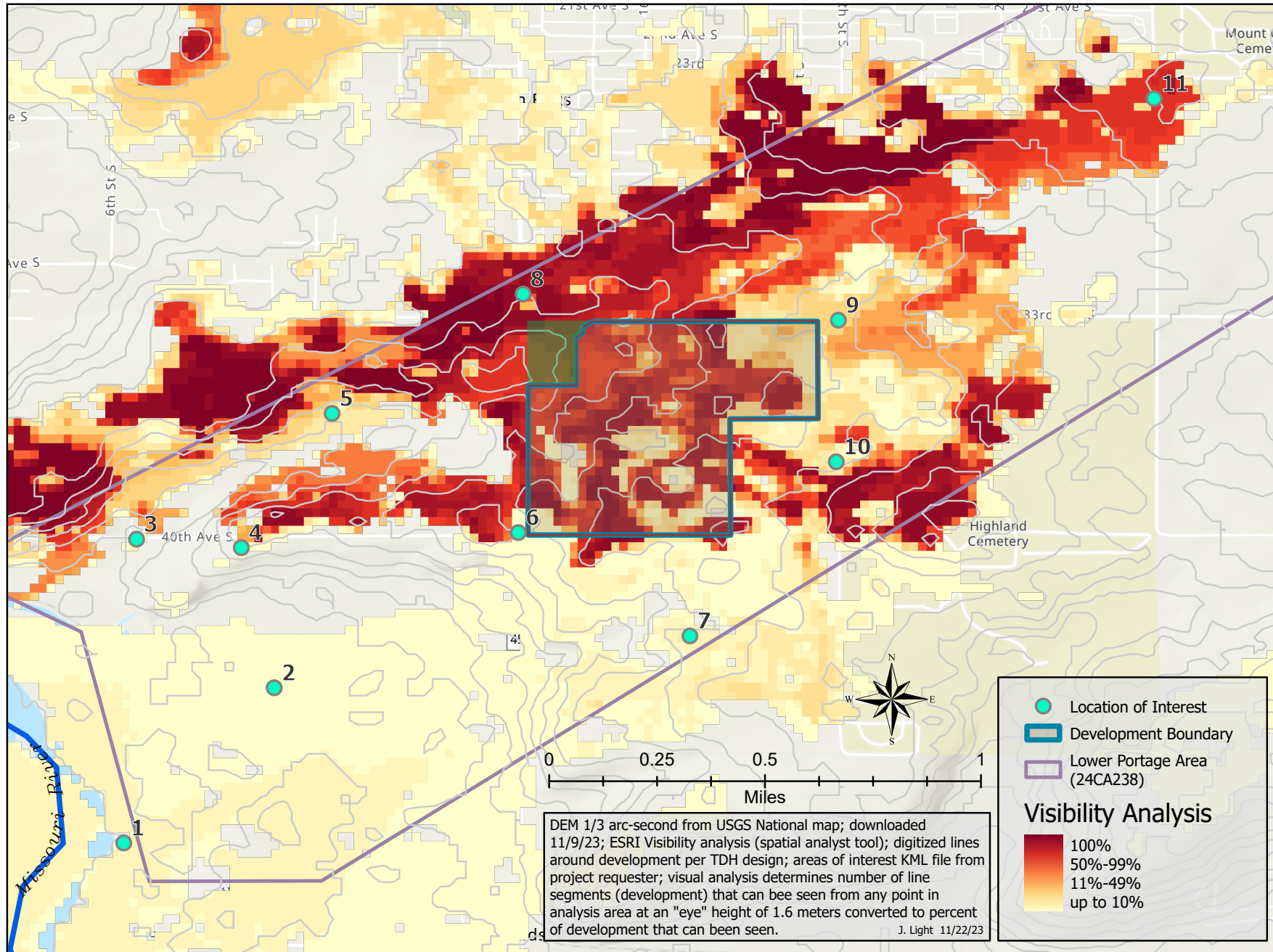
The following table summarizes the visibility at each Viewpoint.

<b>Table 1. Viewshed Analysis of Visual Resource Inventory Viewpoint</b>				
	Visual Resource Inventory Viewpoints	0.5-Foot Development Height (Existing)	15-Foot Development Height (One-Story)	25-Foot Development Height (Two-Story)
1	Upper Portage Camp	Up to 10%	11-49%	11-49%
2	Historic Route – Private Property South	Up to 10%	Up to 10%	Up to 10%
3	L&C Portage Route Overlook West	Up to 10%	Up to 10%	11-49%
4	L&C Portage Route Overlook East	Up to 10%	Up to 10%	11-49%
5	Historic Route – Private Property North	Up to 10%	11-49%	11-49%
6	SW Corner	Up to 10%	50-99%	50-99%
7	Private Property East	Up to 10%	11-49%	11-49%
8	Historic Route NW Corner	50-99%	50-99%	50-99%
9	Great Falls Upper Portage HPHS	11-49%	11-49%	50-99%
10	Highland Cemetery Access Road	11-49%	11-49%	50-99%
11	NE NHL	11-49%	50-99%	50-99%

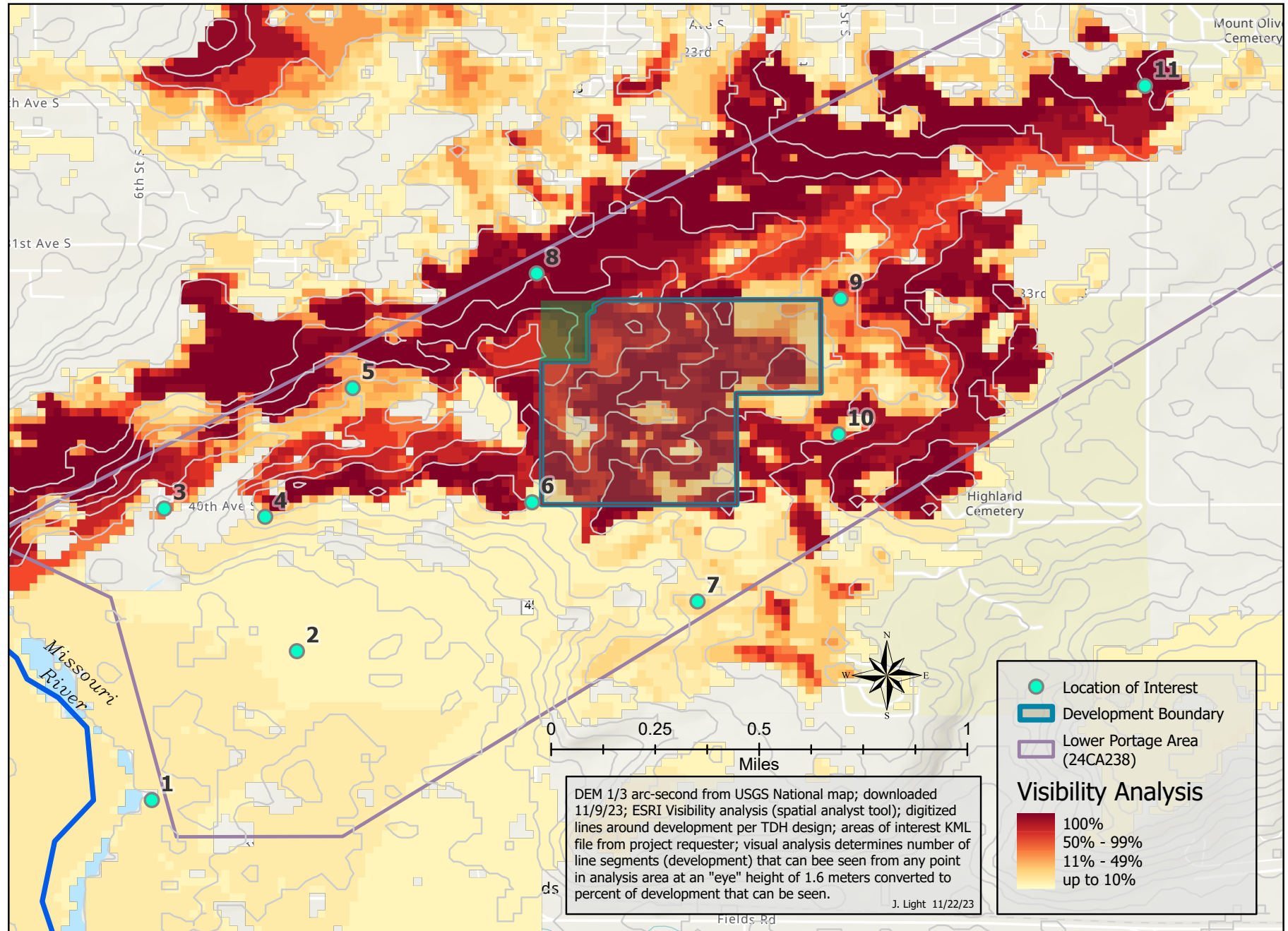
# Highland Development Visual Analysis - 0.5 ft Height



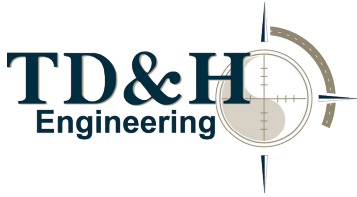
# Highland Development Visual Analysis - 15 ft Height



# Highland Development Visual Analysis - 25 ft Height







# Appendix A

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## EXISTING VIEWPOINT PHOTOS

## Existing Photos Viewpoint 1: Upper Portage Camp



View to North



View to Northeast



View to East



View to South



View to Southwest



View to West

## Existing Photos Viewpoint 3: L&C Portage Route Overlook



**View to North**



**View to Northeast**



**View to East**



**View to South**



**View to Southwest**



**View to West**

## Existing Photos Viewpoint 4: L&C Portage Route Overlook



View to North



View to Northeast



View to East



View to South



View to Southwest



View to West

## Existing Photos Viewpoint 6: SW Corner



**View to North**



**View to Northeast**



**View to East**



**View to South**



**View to Southwest**



**View to West**

## Existing Photos Viewpoint 8: Historic Route - NW Corner



View to North



View to East



View to Southeast



View to South



View to Southwest



View to West

## Existing Photos Viewpoint 9: Great Falls Upper Portage HPHS



**View to North**



**View to Northeast**



**View to East**



**View to South**



**View to Southwest**



**View to West**

## Existing Photos Viewpoint 10: Highland Cemetery Access Road



View to North



View to Northeast



View to East



View to South



View to Southwest



View to West



## Existing Photos Viewpoint 11: NE NHL



**View to North**



**View to Northeast**



**View to East**



**View to South**



**View to Southwest**



**View to West**