

MONTANA'S SHARED HERITAGE

First Biennial Report on the Status, Condition, and Stewardship of Montana's State-owned Heritage Properties



Submitted to the Governor of Montana
and the Montana State Legislature
(Education and Local Government Interim Committee)

In compliance with MCA 22-3-423 (13)
Montana State Antiquities Act

Report prepared and submitted by the Montana Preservation Review Board
and the State Historic Preservation Office of the Montana Historical Society

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*Madison Buffalo Jump State Park, Gallatin County
Cover photo: Masonic Hall; Bannack State Park, Beaverhead County*



Original Governor's Mansion, Helena

FRONT MATTER

Preface

In 2011, the 62nd Legislature of Montana passed Senate Bill 3 amending Sections 22-3-422, 22-3-423, and 22-3-424 of the Montana State Code. The revised sections require state agencies and the Montana university system to biennially report to the Preservation Review Board on the status and maintenance needs of the agencies' heritage properties. The findings from this reporting are to be conveyed by the State Historic Preservation Officer to the legislature, along with recommendations regarding management of the properties.

The need for this information gathering was previously identified by both a Governor's and a Legislature's task force. In 2005, Governor Brian Schweitzer created the Montana Governor's Council on Historic Properties (E.O. 18) to study and report on the state's policies for the preservation of publically-owned historic properties (Report to the 60th Legislature 2007; <http://mhs.mt.gov/shpo/HCadvisoryCouncil.asp>). In 2009, the 61st Legislature also passed a resolution (HJR32) requesting an interim study to evaluate the economic impact of historic preservation projects and strategies (Community Service: Final Report of the Education and Local Government Interim Committee 2009-2010 Interim, 2011, pp II: 1-18); <http://leg.mt.gov/css/Between-Sessions/final-interim-reports-2009-10.asp>). It was recognized in both these studies that of the hundreds of heritage

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properties entrusted to the State of Montana, many were in danger of disappearing or falling into a state of disrepair from which they might never recover. The importance of preserving and maintaining these properties was stressed as a means to foster a strong sense of identity and community, as well as to realize the economic benefits of reusing these valuable resources. Full and appropriate state stewardship begins with regular assessment by state agencies on the condition of the heritage properties under their care.

This document represents the first reporting cycle of this Act, hence is an initial snapshot of the state's current preservation efforts for the properties in their care. This exploration has been welcomed as the beginning of a widespread evaluation intended to generate constructive processes for planning that will benefit the heritage properties under state stewardship and, by extension, the citizens of Montana. The State Historic Preservation Office (SHPO), Preservation Review Board (Board), and state agencies have identified avenues for improvement of this reporting and for viewing the role of historic preservation in the management of their properties.

Acknowledgements

The State Historic Preservation Office and Preservation Review Board are grateful for the efforts of the agencies that reported in this inaugural cycle of documentation and analysis, and the Montana State Legislature for the enabling legislation. No funding was associated with this legislation, yet all parties recognized the current and future value of this reporting.



Hardy Bridge, Cascade County

EXECUTIVE SUMMARY

This first biennial report to the Montana State Legislature fulfills the intent of the revisions to MCA 22-3-422, 22-3-423, and 22-3-424. This report is based upon the information submitted by eleven state agencies that manage heritage properties on state-owned land and provides insightful information to their administration, interpretation, and operation. In assessing the strategies employed by the agencies, the SHPO and Montana Preservation Review Board have articulated twelve key findings about the current state of property stewardship. These have generated six overarching recommendations on how the state can continue to improve performance in these areas.



Fort Assiniboine Post near Havre, Hill County

Findings

These findings are summarized as follows and are expounded upon in the following pages:

DEFINITION OF STATE HERITAGE PROPERTY

“Heritage properties” are defined as those districts, sites, buildings, structures, or objects located upon or beneath the earth or under water that are significant in American history, architecture, archaeology, or culture (MCA 22-3-421).

1. Of the 437 known state-owned heritage properties, only 265 were reported on in this cycle. There are also numerous unknown and undocumented potential heritage properties. The state’s inventory is incomplete.
2. The status of several properties is unresolved; the SHPO and agency disagree about the heritage status of these properties.
3. Other unreported properties represent outstanding questions of responsibility for the management of properties on state-owned land. Not all agencies accept responsibility for properties they manage on state-owned and federally-leased land.
4. Properties with divided ownership, including mineral rights, create confusion among the agencies and other entities.
5. Based upon the agency reports, it appears that 9.1% of the reported properties are endangered and 58.9% have a satisfactory status.
6. Thirty-four percent of the heritage properties are described as in excellent condition, while 11.7% are poor or have failed. The condition of 13.6% is unknown.
7. Repair and maintenance of heritage properties is not sufficiently funded.
8. Some agencies have heritage properties that don’t fit with their mission.
9. State agencies would benefit from expanded guidance and instruction from SHPO for both reporting and for consideration and management of heritage properties.
10. Statewide stewardship costs for the last two years are reported to have been \$5 million. Of this, nearly \$3 million was dedicated to restoration projects and \$1.1 million to maintenance.
11. Some agencies have supplemented their state and, if any, federal, funds for heritage property stewardship with grants and partnerships.
12. Those agencies with cultural resource specialists have access to valuable input and coordination in terms of preservation efforts.

Recommendations

The analysis of the agency reports and the above findings resulted in the following six recommendations. The full range of actions associated with these recommendations is provided near the close of this report.

1. Include historic preservation and stewardship in facilities and resource master planning to address priority preservation maintenance needs.
2. Designate and train a historic preservation officer (HPO) within each agency to oversee agency identification and consideration of state-owned heritage properties and to coordinate agency consultation with SHPO.
3. Provide agencies with professional expertise in preservation.
4. Promote a proactive relationship between the agencies and SHPO. Cultivate a positive, helpful working relationship to include early planning, training of agency personnel, assistance with agencies' legal responsibilities, and development of working teams and processes.
5. Hold agencies accountable for their consideration of the impact of their undertakings on heritage properties and for their reporting.
6. Enable greater consistency of meaningful reporting in the next reporting cycle.

THE REPORTING AGENCIES

- Department of Administration (DOA)
- Fish Wildlife and Parks (Fish and Wildlife Division)
- Fish Wildlife and Parks (Montana State Parks Division)
- Montana Department of Commerce (Montana Heritage Commission)
- Montana Historical Society (MHS)
- Montana Department of Military Affairs (DMA)
- Department of Natural Resources and Conservation (DNRC)
- Department of Public Health and Human Services (DPHHS)
- Montana Department of Transportation (MDT)
- Montana State University (MSU)
- University of Montana (UM)

INTRODUCTION

Revisions to the Montana State Antiquities Act

This reporting is required by amendments in 2011 to the state code, the basis of which is referred to as the Montana State Antiquities Act (MCA 22-3-422, -423, and -424). The intent of the revised code is to gather pertinent information from the state agencies on the status and maintenance needs of their heritage properties. "Heritage properties" are defined as those districts, sites, buildings, structures, or objects located upon or beneath the earth or under water that are significant in American history, architecture, archaeology, or culture (MCA 22-3-421). Eligibility for this designation is established through consultation with the State Historic Preservation Office, using criteria established by the National Park Service for the National Register of Historic Places program. Specifically, the amended Act requires each agency to provide the following information on a biennial basis:

1. A list of the heritage properties managed by the agency as those properties have been identified pursuant to this section;
2. The status and condition of each heritage property;
3. The stewardship efforts in which the agency has engaged to maintain each heritage property and the cost of those activities;
4. A prioritized list of the maintenance needs for the properties; and
5. A record of the agency's compliance with subsections (1) and (2) of MCA 22-3-424. These subsections require the agencies to consult with the State Historic Preservation Office to: (1) adopt rules for identifying and preserving heritage properties and, (2) to develop methods and procedures to give appropriate consideration of heritage properties in state agency decision making.

The Reporting Process

Eleven of the twelve identified agencies responsible for management of state-owned heritage properties reported on 265 properties (several of which contain multiples buildings or sites). The Department of Corrections did not submit a report; hence, this report is not fully complete.



Walt Sullivan Building (Department of Labor and Industry), Helena

This amendment to the State Antiquities Act added new stewardship responsibilities to the SHPO and the Board. The SHPO is a department of the Montana Historical Society, staffed with preservation professionals with expertise in evaluating and listing properties in the National Register of Historic Places; maintaining an inventory of all heritage properties; disseminating information regarding historic properties; assisting local, state, and federal government agencies in comprehensive planning for the treatment of heritage properties; and consulting on the impact of projects on heritage properties, among other duties outlined in MCA 22-3-423. SB3 further requires SHPO to report the information received, and the ensuing recommendations, from this agency reporting to the appropriate legislative interim committee.

The Board is an advocate for historic preservation in Montana and is comprised of nine governor-appointed citizen members representing various professional and public categories, including historians, archaeologists, historic preservation architects, cultural specialists, and interested public. SB3 provides for the Board to accept the agency stewardship reports and to make recommendations regarding management of these properties.

Soon after the passage of SB3, the Board and SHPO developed a pilot process for agency reporting, for Board and SHPO review of agency reports, and for Board and SHPO reporting to the Legislature, with the understanding that this process would set precedents, yet also evolve over the years. With these parameters and the Act's framework in mind, the Board and SHPO met three times before the agency report due date and twice afterwards.

- May 2011: Meeting in Columbus with Senator Bob Hawks, who introduced SB3 to the legislature, to discuss ways to implement the statute's legislative intent. This included development of the reporting mechanism and SHPO staff guidance to the agencies.
- September 2011: Meeting in Missoula to ascertain how to proceed once the agency reports were received.
- January 2012: Meeting in Helena to review the three agency reports submitted early and to establish guidelines. A three-person committee was formed to lead the Board's reporting effort to the legislature.

Concurrently, the work of the Board was supported by SHPO staff, which met three times with state agencies in 2011 to provide guidance and assistance in the preparation of agency stewardship reports under SB3: April 29, July 26, and October 25. SHPO developed and provided agencies with a working list of documented state-owned heritage properties, a uniform template for reporting information on the properties as requested under SB3, and a recommended outline for writing agency narrative reports. SHPO also created a webpage: (<http://mhs.mt.gov/shpo/State-owned%20Heritage%20Properties.asp>) to host this information and the copies of the submitted agency reports. Eleven agency reports were received by the February 7, 2012 due date.

In March 2012, the three-person Board committee met in Hamilton to review the eleven agency reports and take note of trends and commonalities, incorporating responses and feedback from the rest of the Board and the SHPO. Letters to each of the agencies were developed, with the aim of providing useful feedback on their individual reports and the specific issues addressed therein. The full Board met in Kalispell in May 2012 to craft the structure of the report and approve revisions to the individual agency feedback letters. At this time, the Board asked themselves five fundamental questions that guided their response to the reporting:

- What have we as a Board and as individual members of the Board learned about Montana's properties on state-owned land?
- What do we hope the agencies have learned?
- Given what we have learned, what are the most important pieces to include in the report?
- What do we hope the report accomplishes?
- Can this exercise be a teaching moment for the Board, the agencies, and the legislature?

SUMMARY OF FINDINGS

The Agency Reports – Observations

The following observations are a compilation of those identified by the Board and the SHPO. They are organized in accordance with the information requested in the statute.

List of State-owned Heritage Properties

According to SHPO files, 437 state-owned heritage properties have been formally documented, recorded, evaluated, and identified with a Smithsonian trinomial recording number assigned by SHPO.

A list of these properties formed the basis of the information that SHPO provided the agencies. Some agencies added to or modified the list; some had been unaware of the properties. The total of 437 properties does not solely represent single properties; it includes districts with multiple properties, such as Virginia City, Bannack, and the University of Montana campus, among others. The 437 state-owned properties represent about 6% of all the heritage properties, including districts, currently documented in the state.

Of the 437 documented heritage properties, only 265 were reported on in 2012. Many of the unreported properties are those managed by DNRC, which has proposed to report on twenty to thirty properties each year over a 10-year period, in an effort to address their responsibility for 244 of the known heritage properties, more than half of the total. It is common knowledge that there are also numerous unknown, undocumented, and unresolved state-managed potential heritage properties throughout Montana. Other unreported properties represent outstanding questions of responsibility for the management of properties on state-owned land. Grey areas exist with the properties managed by several agencies, such as DNRC, MDT, and DMA. For instance, MDT manages small tangential sections of larger archaeological sites owned or managed by others. The number of sites with such divided ownership is undocumented.



Historic Montana School for the Deaf and Dumb Administration Building, Boulder

DEFINITION OF UNRESOLVED HERITAGE PROPERTY

The state agency and the SHPO do not agree on the significance and/or integrity of the property.

The 265 properties reported upon demonstrate the diversity enfolded in the definition of a heritage property and the history of Montana: not only buildings, but also railroad viaducts and routes, bridges, canals, roads, smoke stacks, tipi rings, mines, archaeological sites, irrigation ditches, and more. They range in age from the earliest human habitation in North America to the modernist government and university buildings. While some agencies have only a handful of properties - and others a great number - to manage, the geographic spread across this large state is a powerful statement about the history of state government, as well as the challenge of providing services and maintaining properties.

STATUS		
Endangered	24	9.1%
Threatened	22	8.3%
Watch	37	14.0%
Satisfactory	156	58.9%
Unknown	26	9.8%
TOTAL	265	

Status and Condition of Heritage Properties

Reporting on the status and condition of Montana’s known heritage properties is exacerbated by varied agency interpretations of the guidance criteria provided and agency unfamiliarity with the language of historic preservation. This reporting cycle has demonstrated a need for expanded guidance and instruction from SHPO. Some properties appear to be endangered but are not reported as such. For instance, some MDT bridges that are programmed for replacement are not reported as endangered, since mitigation efforts will be implemented under a Programmatic Agreement. Other properties – such as railroad grades - are listed as endangered by DNRC yet are merely abandoned, with no known threats posed. Hence, the numbers reported herein might not be truly representative.

CONDITION		
Excellent	90	34.0%
Good	64	24.2%
Fair	44	16.6%
Poor	26	9.8%
Failed	5	1.9%
Unknown	36	13.6%
TOTAL	265	

ENDANGERED – EXAMPLES

- Engineering Hall, Montana Tech (UM)
- Galen State Hospital outbuildings (DNRC)
- Powder River Depot archaeological site (DNRC)

SATISFACTORY – EXAMPLES

- Beartooth Highway (MDT)
- Flathead Lake Salmon Hatchery (FWP)
- Walt Sullivan Building (DOA)

Based only upon the reports provided, it appears that 9.1% of the properties are endangered and 58.9% have a satisfactory status. 34% are reported to be in excellent condition, while 11.7% are said to be in poor condition or have failed. Some of the issues that threaten heritage properties are:

- Out-of-date inventories
- Insufficient funding for repair and maintenance
- Heritage properties that don't fit with the agency's mission
- Lack of agency control over management of mineral rights



Stone Circle (Tipi Ring) Archaeological Site, Pondera County

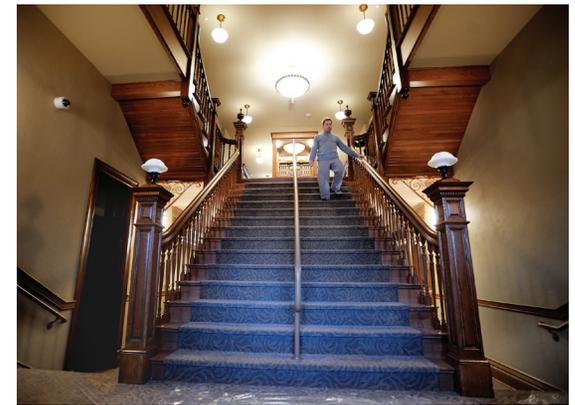
COST OF STEWARDSHIP (2010-2011)

Heritage restoration/rehab project	\$2,993,418
Heritage research/documentation project	\$ 386,584
Heritage interpretation/education project	\$ 275,128
Heritage promotion/marketing project	\$ 8,183
Heritage plan development	\$ 17,820
Maintenance	\$1,116,223
Monitoring (reported)	\$ 79,480

Stewardship Efforts and Associated Costs

The stewardship efforts and associated costs are based upon the agencies' interpretation of the needs of the heritage properties. The reported costs for some agencies appear to be higher than realistic projections, while others are lower. The agencies' interpretations of what should be included in stewardship costs also appear to vary. Identifying demolition costs as stewardship for heritage properties is misguided, as is insensitive maintenance and other non-preservation work. The descriptions and figures provided illustrate a need for more information and guidance. Future reporting cycles should be aided by increased SHPO consultation and the ability of agencies to begin considering and tracking costs now, rather than retroactively (the case in this first reporting cycle). In identifying heritage stewardship efforts and costs, agencies need to ask themselves if the use and care of their heritage properties is consistent with their preservation.

Nonetheless, the overall stewardship costs are reported to have been \$5 million. Of this, nearly \$3 million was dedicated in 2010-2011 to restoration projects and \$1.1 million to maintenance. Of this, some success stories shine out as excellent examples. Montana State Parks utilized a National Park Service Save America's Treasures grant of \$293,400 to stabilize seven buildings at Bannack State Park and other funds to make various repairs to Chief Plenty Coups House, including a new fire protection system. The Bannack State Park work included re-plastering of the Hotel Meade and leveling of the foundation with helical piers. The Montana Heritage Commission continues to preserve buildings in Virginia and Nevada Cities, supplemented by a \$100,000 HB645 preservation grant awarded in 2009. The University of Montana has expanded their recognized historic district to include buildings of the modern era. These examples of creative funding and forward thinking generate greater preservation opportunities.



Flathead County Courthouse \$2.7M building rehabilitation, Kalispell

It is understood nationwide that the cost of historic preservation is money well spent. There is a strong economic driver for stewardship and rehabilitation, as represented in the recent rehabilitation of the Flathead County Courthouse in Kalispell.

Prioritized List of Maintenance Needs

In addition to identifying property-specific preservation maintenance needs, the agencies were asked to rank each property among all agency heritage properties, from a high priority of 1 to a low priority of 5. Some high priority properties include Reeder's Alley in Helena, the Original Governor's Mansion in Helena, Daly Mansion in Hamilton, Pictograph Cave near Billings, the Chemistry Biology Building in Butte, and the Stillwater State Forest Station. Some of these properties are listed with high priorities because their maintenance needs are great, while some are listed to emphasize the agency's continued care for the building. Many high priority properties have no funding to provide the maintenance or rehabilitation identified. Some properties are listed as low maintenance priorities, despite their needs, because no funding is available.

The agency reports represent significant maintenance needs. Some agencies include cost analyses although none were required. DNRC includes costs beyond maintenance, such as projected costs for construction of 17 miles of road and a visitor's center for interpretation of an isolated tipi ring archaeological site. MDT has plans for bridge replacements which – although under the auspices of the programmatic agreement with SHPO – do not constitute preservation maintenance. Future reporting must be revised to better reflect only those properties with urgent needs, irrespective of costs and agency mission.

PRIORITY-NEED PROPERTIES (1-5) HIGHEST TO LOWEST (ALL AGENCIES COMBINED)		
1	39	14.7%
2	31	11.7%
3	25	9.4%
4	26	9.8%
5	144	54.3%
TOTAL	265	

A record of the agencies' compliance with the subsections MCA 22-3-424 (1) and (2)

Subsections (1) and (2) delineate the duties of the state agencies, including the Montana university system, to include consultation with the historical society to (1) adopt rules for the identification and preservation of heritage properties and paleontological remains on state-owned lands or implement SHPO rules at ARM 10-121-901 and (2) to identify and develop methods and procedures to ensure that the identification and protection of heritage properties and paleontological remains on state-owned lands are given appropriate consideration in state agency decision making.

The agency reporting reveals unclear responses or erratic compliance, representing confusion or lack of knowledge and understanding of the statute's requirements. Most agencies didn't address how and when they've consulted with SHPO over the last biennium. It was unclear if this indicates lack of consultation or not. It is clear that quite a few state undertakings are occurring without consultation.

Consulting with SHPO

Four of the agencies – MDT, DNRC, Parks, and UM – have a consistent history of consulting with SHPO. Three agencies – DNRC, Parks, and the University System (Regents Policy) - have their own rules, methods and procedures for consideration of impacts to heritage properties and consultation with SHPO. Consultation – and in-depth understanding of the process – is aided greatly by those agencies which have heritage specialists on staff: MDT, Parks, Montana Heritage Commission, and DNRC.



Point of Rocks Historic Transportation Corridor (Mullan Road & Milwaukee Railroad), near Alberton

The prevailing need to consult with SHPO has been demonstrated by the varied responses of the agencies. The inconsistencies in reporting are based on different interpretations of the statute and concepts of preservation, highlighting the need for more instruction, practice, and expertise.

Disconcerting Trends

Three disconcerting trends prevailed throughout the agency reports:

- Agencies having difficulties incorporating properties not deemed in their mission. This “lack of ownership” occurs despite the clear intent of state law to avoid negative impact on state heritage properties.
- Agencies demonstrating lack of willingness or expertise/ability to manage heritage properties that they own.
- Agencies not aware of their heritage properties. Many heritage properties have not been inventoried.

In fact, some agencies stated that protecting a historic resource is contrary to their mission. It is understood that this can be a struggle for some agencies and some properties. This perception partially results from a gap in the statewide review process, in which consultation with the SHPO is not included in early deliberations for state construction projects. Moreover, there is no consequence for non-compliance; the agencies are not held accountable. Properties often become surplus as a result, providing no apparent use for the responsible agency.



Virginia City National Historic Landmark, Madison County

Best Practices

As with any such varied group of reporting agencies, with distinct missions and staffing, and different funding levels, several best practices became apparent. These practices resulted in successful outcomes for the agencies and the heritage properties under consideration. Several agencies benefited from compliance with the existing State Antiquities Act, primarily in taking advantage of the consultation offered by SHPO and of this reporting effort. The act of reporting in accordance with SB3 was approached by some agencies as an opportunity to evaluate their preservation practices and by others as a validation of their efforts. Some agencies demonstrated lack of commitment and understanding, which becomes an excellent starting point for improvement. This also indicates the need to consult with SHPO and to view SHPO as a resource and not an impediment. For instance, Montana State Parks' report presented a straightforward practice of consultation with SHPO, ensuring that the work complied with the *Secretary of the Interior's Standards for the Treatment of Historic Properties*. Other agencies, such as MDT, have entered into programmatic agreements with SHPO that outline procedures for addressing certain projects that impact heritage properties. MDT rightly perceives this as an effective management tool for a state agency to administer its heritage properties.



Sleeping Buffalo Rock near Saco

Some of the agencies have staff with preservation training. Staff training has allowed Montana State Parks to perform simpler historic preservation projects in-house. The agency has also strived to raise awareness of their management staff with relevant training. "Several regions sent park managers to the Project Archaeology Site Stewardship training program sponsored by the BLM so managers could learn how to correctly monitor sites within their parks. More park managers or interested volunteer site stewards will be sent to this training over the next biennial reporting period."

Consistently, the agencies that have staff with preservation training – in terms of both management and construction – are able to devote time to preservation of their properties. The Montana Heritage Commission's (MHC's) preservation staff is able to stretch the agency's funding further than with contracted crews, and they're able to ascertain the severity of deficiencies. MHC's report's detailed description of the repairs entailed in their preservation work is a clear indication of their abilities, yet also the limits of their small staff. Montana State Parks has been a leader in buttressing the abilities of their own staff and funding by successfully partnering with professors and students from the University of Montana and Montana State University on the surveys, research, and site documentation at Rosebud Battlefield and at Medicine Rocks. In addition, some of their work has been supplemented by grants. Such creative mechanisms help stretch limited state funding and allow the agencies to benefit from the long-term savings inherent in preservation.

RECOMMENDATIONS

The following recommendations have been generated directly from the information and patterns presented in the agencies' reports and are designed to improve management of heritage properties on state-owned land. None of these recommendations are intended to constitute statutory changes.

1. ***Include historic preservation and stewardship in facilities and resource master planning to address priority preservation maintenance needs.***
 - a. Ensure compliance with the existing law – the State Antiquities Act, as modified by SB3.
 - b. Continue/complete the inventory of heritage properties, in consultation with SHPO.
 - c. Include SHPO consultation in the early stages of planning any building alteration or ground disturbance, whether the property is known to be a heritage property or not. Any property over 45 years old is a potential heritage property. Early consultation will reduce incorrect biased interpretations and identify previously undocumented heritage properties.
 - d. Integrate SHPO consultation into long-range building plans and prioritization for planning, concurrently with the work of the State Architecture & Engineering Division of the Department of Administration.
 - e. Examine the state's method of handling surplus properties.
2. ***Designate and train a historic preservation officer (HPO) within each agency to oversee agency identification and consideration of state-owned heritage properties and to coordinate agency consultation with SHPO.***
 - a. Incorporate SHPO training of the agency HPO, to help the agencies be more efficient in this regard.
 - b. Develop an HPO training manual, to enable the HPO to communicate effectively with agency staff and the SHPO, to be able to prioritize the agency's preservation needs, and to implement best practices.
 - c. Enable the HPO to promote an understanding of the values and significance of heritage properties, and the statutory requirements for avoiding adverse impact, to agency staff, tenants, and the public, whenever feasible.



Eagle Butte School - before and after restoration by volunteers, Choteau County

3. ***Provide agencies with professional expertise in preservation.***
 - a. Budget for appropriate expertise and/or adequate professional staffing. Increase agency funding as appropriate; funding should be dedicated to this expertise.
 - b. Employ or retain persons with historic preservation expertise in making assessments and recommendations for state heritage properties, in order to facilitate informed decision-making.
 - c. DNRC has many more unknown heritage properties which are too much responsibility for their one cultural resource specialist. This agency should have an increase in cultural resource staff.
4. ***Promote a proactive relationship between the agencies and SHPO. Cultivate a positive, helpful working relationship to include early planning, training of agency personnel, assistance with agencies' legally-mandated responsibilities, and development of working teams and processes.***
5. ***Hold agencies accountable for their consideration of the impact of their undertakings on heritage properties and for their reporting.***
6. ***Enable greater consistency of meaningful reporting in the next reporting cycle.***
 - a. Continue SHPO's and the Board's work with the agencies, to further the goal of gathering the most useful and pertinent information.
 - b. Ensure more valid statistics by providing unambiguous definitions of the terms contained in the reporting guidelines.

Further information on the Montana State Antiquities Act and Montana's state-owned properties, including the 2012 State Agency Biennial Reports, can be found at www.montanahistoricalsociety.org/shpo.