



February 14, 2005

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Craig Marr
Montana Fish, Wildlife and Parks
Helena Area Resource Office
PO Box 200701
930 Custer Avenue W.
Helena, MT 59620-0701

LEGISLATIVE ENVIRONMENTAL
POLICY OFFICE

RE: Spring Meadow Lake State Park Projects – Public Comment

Dear Mr. Marr,

The Helena / Lewis and Clark County Historic Preservation Commission (HPC) submits the following remarks regarding the proposed projects in and near Spring Meadow Lake State Park. Specifically, these comments address the proposed removal of the Pattern House at the Stedman Foundry Complex.

In brief, the Helena/Lewis and Clark County Historic Preservation Commission does not agree with certain assertions and proposals in the above EA.

- The EA does not accurately assess the relative significance of the historic property, “Stedman Foundry”, affected by the Spring Meadow Project to the detriment of that historic property. That historic property is ‘unique’.
- The decision to divert an insurance settlement for a fire that destroyed part of the Stedman Foundry while in the care of the state from that historic property’s most threatened structure, the Pattern House demonstrates a lack of success in protecting unique historic resources of the state of Montana..
- The EA’s suggestion that demolition of the Pattern House would be forestalled for the period of 12 months to allow a third party the opportunity to raise over \$350,00 to stabilize that structure is impractical and risks the characterization of being disingenuous.

- The EA does not adequately address the loss of historic structures and the loss of public enjoyment. Classifying this impact as 'minor' misses the mark.. This classification should be 'potentially significant' due to the rare nature of the structure and the public loss involved. Mitigation of structure loss through 'representative' interpretation is not an adequate substitute in light of the real option of funding the stabilization of the Pattern House.

HPC acknowledges the Montana Fish, Wildlife and Parks (FWP) attempt to fairly disclose potential human and environmental affects from their proposed action at the Park. However, HPC disagrees with the proposed action concerning the Pattern House included in the preferred Alternative A. HPC supports Alternative B or variations of that alternative and makes the following observations about other language in the EA:

- ✓ Page 10, Paragraph #3. *"Thought this site played an important role in Helena history, it is not extremely unique or rare."*

This statement is in error when it refers only to "Helena history". Research documented in the National Register nomination approved by the National Park Service on April 4, 1996 substantiates the significance of the Steadman Foundry on both the local and state level. In part, the nomination states:

"...the Steadman complex gains significance as a well-persevered early example of industrial building and standard mill construction in Montana."

Even when the fire removed one of the monitor-roofed structures in 2002 (the Foundry and Molding Building), the construction referred to in this statement remains represented at the Steadman Foundry site and the contribution of the Pattern House, differentiated from that of its associated structures, remains intact. Demolition through neglect and planned removal of mill structures and their associated buildings throughout the American West has elevated survivors such as the Steadman Foundry to rare status.

- ✓ Page 10, Paragraph #3. *"A Pattern House from the same era is has been renovated and is open to the public..."*

This statement is in error. The pattern house for the Caird Iron Works to which the statement refers was constructed as a commercial building (a store) and operated by the Northern Pacific Railroad, among others, until purchased by the Caird Iron Works to store iron patterns following a fire that destroyed the Caird facility assigned that use. The history of this second "pattern house" is not comparable to that of the Steadman Foundry's original and less fundamentally unaltered historic fabric.

- ✓ Part IV – Environmental Review Checklist, Table B-12a Cultural / Historical Resources.

Classifying the project's impact as 'minor' is less than required given the significance of the property. This classification should be 'potentially significant' due to the rare nature of the structure and the public loss involved. The HPC considers mitigation of structure loss through 'representative' interpretation not an adequate substitute in light of the real option of funding the stabilization of the Pattern House.

- ✓ Page 6, under (b) FUNDING: Existing Resources, etc. and Page 10, Paragraph #1.

As stated in the EA, the Stedman Foundry buildings are on the National Register of Historic Places. This status came following a lengthy process demonstrating the historical and cultural value of these structures under state and federal authorities. Therefore, it must be sufficiently demonstrated that 'dismantling' the Pattern House is the least favorable alternative. HPC believes FWP has not adequately pursued alternatives that support the continued use of this structure. To date, HPC is not aware of any serious efforts to initiate a collaborative process to solicit interest and partnerships. FWP stated unwillingness to 'expend the excess time and effort' on the Pattern House only highlights this remark..

The state received \$464,000 in insurance settlement when an arson-caused fire destroyed the Foundry and Molding building in 2002. The EA (page 10) refers to a 1995 study of the historic structures at the Spring Meadow project site that identifies the old buildings as reusable in the context of the wildlife center. It does not indicate that a substantial effort has been made to incorporate the structures remaining into the Spring Meadow program through similar intensive study after the fire of 2002. Instead, the Pattern House has been written off as a redundant structure and the money from the fire settlement diverted to, in part, refitting the other remaining historic structure. Although some of this money is to be invested in the historic Machine Shop, such radical triage is at best questionable.

As a steward of Montana's heritage, the state has an obligation to thoughtfully and even aggressively retain those remnants of that heritage in its care. In this instance, the state has failed to prevent the arson of one of its special and unique resources, the lost Foundry and Molding building, and has then decided not to invest the resultant insurance settlement in a surviving historic structure. It should further be noted that, if it were not for the objections of the State Historic Preservation Office, the Pattern House would have been destroyed in the wake of the 2002 fire based on claims that it had become unstable because of that fire. The seemingly hasty judgments and the erroneous assessments of the state in this instance call into question its ability to adequately manage this historic complex in the interests of historical preservation.

- ✓ Page 13, paragraphs 6 and 4. *"FWP ...would consider retaining the Pattern House if a private group or organization came forward with the funding to stabilize the building within approximately one year."*

If the state could not generate funds to do this over the last twelve years, how is an organization expected to do so in "approximately one year." This offer is not practical. Again, the state has the funding to stabilize the Pattern House from the insurance settlement from the fire. In addition, the Commission notes that no projected use follows this suggestion for stabilization by the state. A three story structure overlooking the Spring Meadow project should, with measured consideration, should be able to meaningfully contribute to that project. The EA reports:

"The Pattern House is three stories high. Early planning efforts intended renovation with a multi-purpose room on the ground level, resource library on the second floor, and a viewing tower on the top."

It then states that the fire changed priorities for the buildings but does not reveal why. This Commission believes that the practical use of the Pattern House should be reconsidered in light of its

architectural and historical significance. The rudimentary construction of such a building might well serve a new use and its historic message better without elaborate rehabilitation. The Commission points to use of the Pattern House as simply a viewing tower and three-season indoor amphitheater as an example of a less ambitious, more practical and even more appropriate alternative. Even if the structure were surrounded with visible earthquake resistant members it would be better than losing it altogether. This matter requires serious examination, not the throw-away dismissal identified as the Preferred Alternative in the EA.

In summary, HPC supports Alternative B or some variation of that alternative wherein FWP would work with private organizations to stabilize the Pattern House or even repair it for a new use. To date, HPC believes not enough effort has been dedicated to this course of action and objects to the diversion of insurance settlement funding from protecting a major component of the site. It is hoped FWP will be able to form a collaborative effort involving the state historic preservation office, HPC, and other groups through a facilitated process to successfully manage the heritage resources under its care.

Thank you for considering these remarks.

Sincerely,

Will Greiner, Chair
Helena/Lewis and Clark County Historic Preservation Commission

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