



U.S. Department
of Transportation

**Federal Highway
Administration**

Western Federal Lands Highway Division

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May 20, 2008

Ms. Carol Legard
Federal Highway Administration Liaison
Advisory Council on Historic Preservation
1100 Pennsylvania Avenue, NW, Suite 803
Old Post Office Building
Washington, DC 20004

In Reply Refer To:
HFL-17

Montana Forest Highway 98-1(1)
Rimini Road

Notification of Adverse Effects and Mitigation per 36 CFR § 800.6 (a) (1)

Dear Ms. Legard:

The Western Federal Lands Highway Division (WFLHD), in cooperation with the USDA Forest Service, Helena National Forest (USFS), the Montana Department of Transportation (MDT), and Lewis and Clark County (County) is proposing the improvement of MT FH 98 (Milepost 0.0 to 6.1) in Lewis and Clark County. The project is locally known as the Rimini Road. The project begins at MP 0.0 at the junction with US 12, ten miles southwest of Helena, and proceeds southerly to MP 6.1 at the Chessman Reservoir Road, approximately 1,650 feet north of the town of Rimini (Aaberg 2004a: Figure 2).

The project includes portions of Section 34, Township 10N, R5W, and Sections 3-4, 9, 16-17, 20, 29 and 32 in Township 9N, R5W.

The route follows Tenmile Creek for most of its distance. Project objectives include reduced maintenance costs, the reduction or elimination of airborne dust, improved driving conditions, and widening to provide adequate surfacing width. Other objectives include realignment and reconstruction to improve safety, realignment of portions away from Tenmile Creek to reduce sedimentation, replacement of three bridges, and upgrading of guardrail, signing, striping, and other safety features to current standards.

The 2004 archaeological inventory by Aaberg Cultural Resource Consulting Service documented three previously recorded and forty-nine newly recorded cultural resource properties within the original project area of potential effect (APE) between MP 0.0 and 7.4. The project was subsequently revised to end at MP 6.1, at the intersection of Chessman Reservoir road, approximately 0.31 mile/1650 feet north of Rimini. The revised APE is considered to be 100 feet on either side of the present road centerline and contains twenty-three properties, twenty of which were newly recorded.

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The remaining twenty-nine properties are within Rimini itself, and will not be directly or indirectly affected by this proposed project. These structures have, however, been evaluated for their potential National Register eligibility.

No prehistoric archaeological sites, features, artifacts or other resources affiliated with Native American Indians were observed or recorded. This absence is thought to be the result of the narrow APE within a landscape subjected to periodic flooding and sustained industrial development.

Of the fifty-two properties within the area of potential effects, twenty-eight are recommended eligible. One property previously recommended as ineligible is recommended for reconsideration. Twenty-two properties are recommended not eligible; one other property requires additional study for a recommendation (Table 1).

The USFS manages one eligible property; another was previously determined not eligible but is recommended for reconsideration. The USFS permits five eligible properties as recreational residences on National Forest lands. Three eligible properties are under mixed USFS, private, City of Helena and County ownership.

The County exclusively manages a single property, and 18 properties are exclusively private. One feature, a historical pictograph or sign, could not be evaluated due to insufficient information (Table 2).

**Table 1. Cultural Resource Properties Within the Rimini Road Project Area
(Numerical order)***

Site Number	Description	Ownership	NRHP Eligibility
Part A. Cultural Resource Properties Within the 100' Area of Potential Effect			
24LC935	Camp Rimini-CCC Camp & WWII sled dog training center	U.S. Forest Service (USFS)	Reconsider/ Eligible
24LC1268	Northern Pacific Railroad grade	USFS, City of Helena, various private owners	Eligible
24LC1608	Moose Creek Ranger Station/historic cabin and garage	USFS	Eligible
24LC1866	Old Montana Central Railroad grade/current county road	Lewis and Clark County	Eligible
24LC1867	Old wagon road to Rimini	USFS, private	Eligible
24LC1868	Tenmile Ditch/Old Helena water supply ditch	USFS, City of Helena, Lewis and Clark County, various private owners	Eligible

Site Number	Description	Ownership	NRHP Eligibility
24LC1869	Tenmile water plant manager's residence foundations	City of Helena	Not eligible
24LC1870	Remnants of crib bridge	Private	Not eligible
24LC1871	Prospect pit	Private	Not eligible
24LC1872	Historical sign/pictograph	Private	Further study required
24LC1873	Trash dump	Private	Not eligible
24LC1874	Subsistence placer mining camp	USFS	Not eligible
24LC1875	Trash/can dump	USFS	Not eligible
24LC1876	Timber road bridge (#1)	Lewis and Clark County	Not eligible
24LC1877	Foot bridge	Lewis and Clark County	Not eligible
24LC1878	Timber road bridge (#3)	Lewis and Clark County	Not eligible
24LC1879	Pine Ridge Associates Ranch/farmstead	Private	Eligible
24LC1880	Timber road bridge (#4)	Lewis and Clark County	Not eligible
24LC1881	Cabin (45 Minutes From Broadway)	Land leased from USFS; cabin is privately owned	Eligible
24LC1882	The Glenwood	Land leased from USFS; structures privately owned	Eligible
24LC1883	Historical residential cabin	Land leased from USFS; cabin privately owned	Not eligible
24LC1884	Historic residential cabin	Land leased from USFS; cabin privately owned	Eligible
24LC1885	Hamper Cabin	Land leased from USFS; cabin privately owned	Eligible
Part B. Cultural Resource Properties Outside the 100' Area of Potential Effect (Extended Coverage Area & Rimini)			
24LC1886	Hughes Cabin	Land leased from USFS; cabin is privately owned	Eligible
24LC1887	Brown House/historic residence	Private	Eligible

Site Number	Description	Ownership	NRHP Eligibility
24LC1888	Weston Property	Private	Eligible
24LC1889	Eakin House	Private	Not eligible
24LC1890	Sorth Cabin	Private	Eligible
24LC1891	Silberling House	Private	Eligible
24LC1892	Gott Cabin	Private	Not eligible
24LC1893	James House/Rimini Hotel?	Private	Not eligible
24LC1894	False front store	Private	Eligible
24LC1895	Log house and frame house	Private	Not eligible
24LC1896	Red Mountain Tavern	Private	Eligible
24LC1897	Headquarters Saloon	Private	Eligible
24LC1898	Log garage/livery	Private	Eligible
24LC1899	Log cabin	Private	Eligible
24LC1900	Historic house and garage	Private	Eligible
24LC1901	Historic cabin	Private	Eligible
24LC1902	Cathy Maynard Office	Private	Eligible
24LC1903	Baumann House	Private	Not eligible
24LC1904	Bovington House	Private	Not eligible
24LC1905	Vercellin House	Private	Eligible
24LC1906	Rose Wilson store/residence	Private	Eligible
24LC1907	McDaniel residence	Private	Not eligible
24LC1908	Pickett House	Private	Eligible
24LC1909	Gulden House	Private	Eligible
24LC1910	Rimini School	Private	Eligible
24LC1911	Boundy House	Private	Not eligible
24LC1912	Moore House	Private	Not eligible
24LC1913	Thompson cabins	Private	Not eligible
24LC1914	Banks Cabin	Private	Not eligible

* Per Aaberg (2004:49-50)

**Table 2. Cultural Resource Properties Within the Rimini Road Project Area
(Ordered by Ownership and Eligibility)****

Site Number	Description	Ownership	NRHP Eligibility
Part A. Cultural Resource Properties Within the 100' Area of Potential Effect			
24LC935	Camp Rimini-CCC Camp & WWII sled dog training center	USFS	Reconsider/ Eligible
24LC1268	Northern Pacific Railroad grade	USFS, City of Helena, private owners	Eligible
24LC1608	Moose Creek Ranger Station/historic cabin and garage	USFS	Eligible
24LC1866	Old Montana Central Railroad grade/current county road	Lewis and Clark County	Eligible
24LC1867	Old wagon road to Rimini	USFS, private	Eligible
24LC1881	Cabin (45 Minutes From Broadway)	Land leased from USFS; cabin is privately owned	Eligible
24LC1882	The Glenwood	Land leased from USFS; structures privately owned	Eligible
24LC1884	Historic residential cabin	Land leased from USFS; cabin privately owned	Eligible
24LC1885	Hamper Cabin	Land leased from USFS; cabin privately owned	Eligible
24LC1868	Tenmile Ditch/Old Helena water supply ditch	USFS, City of Helena, Lewis and Clark County, various private owners	Eligible
24LC1879	Pine Ridge Associates Ranch/farmstead	Private	Eligible
24LC1872	Historical sign/pictograph	Private	Insuff. Info.
24LC1869	Tenmile water plant manager's residence foundations	City of Helena	Not eligible
24LC1870	Remnants of crib bridge	Private	Not eligible
24LC1871	Prospect pit	Private	Not eligible
24LC1873	Trash dump	Private	Not eligible
24LC1874	Subsistence placer mining camp	USFS	Not eligible
24LC1875	Trash/can dump	USFS	Not eligible
24LC1883	Historical residential cabin	Land leased from USFS; cabin privately owned	Not eligible
24LC1876	Timber road bridge (#1)	Lewis and Clark County	Not eligible
24LC1877	Foot bridge	Lewis and Clark County	Not eligible
24LC1878	Timber road bridge (#3)	Lewis and Clark County	Not eligible
24LC1880	Timber road bridge (#4)	Lewis and Clark County	Not eligible

Site Number	Description	Ownership	NRHP Eligibility
24LC1873	Trash dump	Private	Not eligible
Part B. Cultural Resource Properties Outside the 100' Area of Potential Effect (Extended Coverage Area & Rimini)			
24LC1886	Hughes Cabin	Land leased from USFS; cabin is private	Eligible
24LC1887	Brown House/historic residence	Private	Eligible
24LC1888	Weston Property	Private	Eligible
24LC1890	Sorth Cabin	Private	Eligible
24LC1891	Silberling House	Private	Eligible
24LC1894	False front store	Private	Eligible
24LC1896	Red Mountain Tavern	Private	Eligible
24LC1897	Headquarters Saloon	Private	Eligible
24LC1898	Log garage/livery	Private	Eligible
24LC1899	Log cabin	Private	Eligible
24LC1900	Historic house and garage	Private	Eligible
24LC1901	Historic cabin	Private	Eligible
24LC1902	Cathy Maynard Office	Private	Eligible
24LC1905	Vercellin House	Private	Eligible
24LC1906	Rose Wilson store/residence	Private	Eligible
24LC1908	Pickett House	Private	Eligible
24LC1909	Gulden House	Private	Eligible
24LC1910	Rimini School	Private	Eligible
24LC1889	Eakin House	Private	Not eligible
24LC1892	Gott Cabin	private	Not eligible
24LC1893	James House/Rimini Hotel?	Private	Not eligible
24LC1895	Log house and frame house	Private	Not eligible
24LC1903	Baumann House	Private	Not eligible
24LC1904	Bovington House	Private	Not eligible
24LC1907	McDaniel residence	Private	Not eligible
24LC1911	Boundy House	Private	Not eligible
24LC1912	Moore House	Private	Not eligible
24LC1913	Thompson cabins	Private	Not eligible
24LC1914	Banks Cabin	Private	Not eligible

**Modified from Aaberg (2004:49-50)

Twelve of the thirty potentially eligible properties are within the APE. The remaining eighteen properties are adjacent to or within the town of Rimini, and will not be affected by this project (Table 2, Aaberg 2004a: Figure 2).

Eligibility, Effects and Proposed Treatment of Eligible Adversely Affected Cultural Resource Properties

Individual property descriptions and recommendations are discussed at length in Aaberg (2004a). These recommendations are summarized by individual property in the following text with citations for specific references.

24LC935 is the location of the former Camp Rimini-CCC Camp & WWII sled dog training center, on lands administered by the USFS. Camp Rimini (Aaberg 2004a: Figure 4) served as Civilian Conservation Corps (CCC) Camp F-79 between 1939 and 1942; it was converted to a WWII military sled-dog training camp in 1942 and operated as such until 1944. At least twenty seven structures were known to have been present over time. The former Northern Pacific Railroad Grade (24LC1268) also runs through the site. The site was leased to the Boy Scouts in 1958, and was later used as a Youth Conservation Corps (YCC) camp. It is presently used as a campsite and snowmobile access and parking area (Aaberg 2004a: 54-58.)

The property was recommended not eligible to the National Register in 1990; Aaberg (2004a: 59; 2004B: 24CL935 site update 3.2) suggests the site be re-evaluated under Criteria A and D. The site has a long history of public service, beginning with recovery from the Depression with the CCC, use as a War Dog Reception and Training Center during WWII, and later transitioning to social uses with the Boy Scouts and the YCC. While Criteria A eligibility criteria would appear to be satisfied, Criteria D may be more difficult to satisfy outside of archival data due to the successive occupations and extensive modification of the site and vicinity.

There is no surviving above ground architecture. Remaining features consist of concrete slabs and steps, and rockwork. The bulk of the features are west of the NPR grade (Aaberg 2004b: 24LC935 sketch map).

For the present, the WFLHD is unable to assess National Register eligibility in an affirmative manner. The site is largely outside of the area of potential effect, and will not be adversely affected due to road construction, although portions of two features and the jack-leg fence occur within the 100 feet APE. Existing ongoing effects will continue to occur from use as a dispersed campsite, hiking and snowmobiling parking area. Foreseeable affects are likely limited to paving a short (ca. 20') approach apron onto the existing USFS access road into this developed recreation site. We would consider that the reconstruction of the Rimini Road will not be an adverse effect upon the site.

24LC1268 is the former Northern Pacific Railroad Helena to Red Mountain Line (Aaberg 2004a: Figure 4). Ownership includes the USFS, City of Helena and various private owners. The rail line from Helena to Rimini was completed in 1886, and extended to the Red Mountain Tunnel at a later date; it operated for only thirty-eight years. The rails were pulled after 1925. Features well south of the project area in Rimini include remains of a circular turntable foundation, foundations for an aerial tram, and a depot foundation. Features within the project area include the grade itself, cuts in bedrock and dry-laid rock retaining walls, with a few bridge

pilings at one crossing of Tenmile Creek and remains of a stone and concrete bridge over Minnehaha Creek (Aberg 2004a: 62; 2004b).

Aaberg (2004a: 59-64) provides a detailed description and context for the evaluation of the feature, and we agree that it is clearly eligible to the National Register under Criteria A, C and D. Condition of the grade and features within the project area is relatively good. Detailed information is available from the site record in Aaberg (2004b).

Adverse effects will occur from reconstruction and realignment of segments of the existing road and reconstruction of the bridges. Several sections of the Northern Pacific Railroad grade will be removed or otherwise impacted. These impacts will necessitate a separate Section 4(f) analysis by WFLHD.

The removal of segments of the former grade will result in the loss of integrity of the grade at those locations. Recommended mitigation actions include photo documentation and detailed recording of engineering and dimensional attributes, further archival research for engineering detail and personnel, and historic photo-archival research (Aaberg 2004a: 64).

Areas of the site outside of the construction limits will be delineated with construction fencing to prevent inadvertent entry during the life of the project.

24LC1608 is the former Moose Creek Ranger Station/historic cabin and garage, built between 1908 and the 1930s by the USFS (USFS 2005) (Aaberg 2004a: Figure 4). The site was briefly in private ownership until 1998, when it was reacquired by the USFS. It has been determined eligible by the USFS (Aaberg 2004a: 67; 2004b), and it is currently being restored for public use as a summer educational facility and winter rental cabin.

The site is presently 125 feet east of the Rimini Road; no adverse effects are anticipated. While it is likely that an approach apron will be paved onto the existing access road, this will not affect usage as the site is being actively managed for public use.

24LC1866 is the grade of the former Montana Central Railroad, converted to the present county road in 1908 (Aaberg 2004a: 68; 2004b) (Aaberg 2004a: Figure 4). The MCR grade from Helena to Rimini was completed in 1886 but ties and rails were never laid. The abandoned grade began to be used by locals as a wagon road soon after its completion; around 1908 local citizens successfully petitioned the county to have the former MCR grade designated as the county road to Rimini. The pre-1908 wagon road to Rimini (24LC1867) lay west of Tenmile Creek and the present road/ former MCR grade and generally followed the base of the west valley slopes (Aaberg 2004a: 68).

Surviving remnants of the MCR grade depart the present Rimini Road at two locations, both of which are outside of the present project area (Aaberg 2004b: site form 24CL1866 and maps). The northern locale lies northeast of the Rimini Road at its first crossing of Tenmile Creek, the southern locale is within the town of Rimini.

The former MCR grade is proposed eligible to the National Register under Criteria A, although the majority of the grade became the present Rimini Road in 1908. Despite the attendant

extensive improvements over the intervening 97 years, the alignment retains integrity of location although integrity of construction is lost (Aaberg 2004a: 71-72).

Reconstruction of the Rimini Road will not have an adverse effect on the alignment of the former MCR grade. The feature is proposed eligible as retaining integrity of historical association linking events within the Rimini Mining District and the Tenmile Canyon area. The road and grade are suggested eligible under Criteria A because of their association with the mining history of Tenmile Canyon and the community of Rimini. The grade component is suggested eligible under Criteria B because of its association with James Hill and Charles Broadwater. The feature is also potentially eligible under Criteria D (Aaberg 2004a: 72).

The surviving intact segments of the MCR grade are well outside of the area of direct effects and will not be affected by the proposed reconstruction. Although Aaberg (2004a: 72) posits the potential for remaining ballast of the former MCR grade within the present Rimini Road, it is more probable that the MCR fabric has been removed through road improvement and maintenance over the intervening 97 years.

Sub-excavation is not expected for this project, with the possible exception of mine tailings, contaminated with heavy metals, used to repair two floodwater washouts near the southern end of the project. These tailings will likely be removed by the Environmental Protection Agency (EPA) to a designated landfill and replaced with clean material prior to construction.

24LC1867 is the original pre-1908 wagon road to Rimini (Aaberg 2004a: Figure 4). The road certainly dates to 1883 and potentially to the late 1860s. The road served to provide access to and supplies to mining operations up the drainage and, later, Rimini. The location is typical, in that it is at the base of the slope on the western side of the drainage where first light and insulation minimize winter ice and snow, and maximizes visibility and warmth.

Approximately 4.5 miles of the road has been preserved by abandonment and a lack of intensive subsequent uses of the landscape. Aaberg documents the locations of surviving segments of the road. Ownership is by the USFS and various private fee holdings.

The road and associated features is sufficiently expressed to confidently recommend eligibility under Criteria A and D. Additional archival research may be necessary to adequately document eligibility.

Effects are recommended not to be adverse. Aaberg (2004:74) notes, “Where the old road was reliably detected, it occurs well outside of the APE...In other areas, within or more proximal to the APE, the road has been obliterated or cannot be reliably identified.”

24LC1868, the Tenmile Ditch/Old Helena water supply ditch, dates from the 1860s until approximately 1921, when it was replaced by a concrete waterline laid adjacent to and within the Rimini Road (Aaberg 2004a: 84) (Aaberg 2004a: Figure 4). Features associated with successive development of the ditch include ditches, rock-lined ditches, flume platforms, a boulder with lichen-observed graffiti and head gates. Many of these features are wonderfully preserved (Aaberg 2004b: 24LC1868 form) the ditch has on the whole excellent integrity of design and location.

The ditch system functioned from the 1860s through a series of upgrades until a buried pipeline replaced it in about 1921 (Aaberg 2004a: 78). The sequence of a number of extant ditch and flume features needs to be researched further; additional field mapping and archival research are recommended.

Archival research by Aaberg (2004a: 75-85) provides conclusive documentation for eligibility under Criteria A, B and C. The extensive documentation and context developed by Aaberg (2004b: 24LC1868 site form) documents the long history of the water system with the City of Helena, and its water supply and quality concerns that begin as early as 1865, when water rights were awarded to the Helena Water Works Company, later acquired by the City of Helena in 1911.

Several sections of the Old Helena Water Supply Ditch will be removed or otherwise impacted through the realignment and widening of the road and reconstruction of the bridges. The loss of these feature elements will result in the loss of integrity to significant components of the water system. These impacts will necessitate a separate Section 4(f) analysis by WFLHD.

It is recommended that these adverse effects be mitigated by data recovery including GPS mapping of the entire water system, additional archival research in local Helena resources mentioned by Aaberg (2004a: 86), and thorough mapping and photography of all ditch features.

Post-inventory discovery includes lichen-covered graffiti above the flume section opposite Minnehaha Creek. Specialized photographic or other techniques must be utilized to interpret the lettering on the rock.

Areas of the site outside of the construction limits will be delineated with construction fencing to prevent inadvertent entry during the life of the project.

24LC1872 is a historical sign/pictograph on private lands well outside of the area of potential effects (Aaberg 2004a: Figure 4). The pictograph is situated on a basalt face approximately 246 feet above and northeast of the present road, and consists of painted lettering approximately 12 inches high. The remaining lettering consists of the letters “LEK” and “HOES”; the lettering preceding both incomplete words has weathered away (Aaberg 2004a: 89-90). Aaberg posits the sign was an advertisement for a cobbler or shoe shop.

Potential National Register eligibility is problematic, and should not be dismissed until additional research is undertaken to explore possible links to significant persons, enterprises, events or other links to local history. Pictographic advertising is rare in the region. However, the feature is approximately 180 feet from the edge of the road, and at least 49 feet upslope and outside of the area of potential effect. No adverse effects are anticipated as a result of any project activity.

24LC1879 consists of the Pine Ridge Associates Ranch/farmstead, a privately held ranch of twelve structures and features, two of which are on the former NPR grade (Aaberg 2004a: Figure 4). The complex consists of a main residence, a milk house and tool shed, a modern two-and-one-half car garage, small wood-frame cabin, two outhouses, a former chicken coop, a milk goat barn, a summer cabin, two other garages, and a well.

Aaberg (2004a: 102) recommends Criteria C eligibility for the site as an outstanding example of post-World War II log buildings. This is based upon the site's cohesive collection of 1940s log structures which retain massing, plan, façade arrangement, and structural and finish materials that remain intact, despite replacement of some windows. Additionally, the forested setting and feeling along the Rimini Road is relatively unchanged from the period of development and the site has a continuous association with the original family.

With the exception of the well, all features are between 68 feet and 150 feet outside of the APE. The well itself is 30 feet from the western edge of the road. The project will not have a direct or adverse effect to the property or any of its features.

24LC1881 is a cabin, log garage, stone fountain and pond known locally as "45 Minutes From Broadway", a privately owned cabin on land leased from the USFS (Aaberg 2004a: Figure 4). The build date is documented as 1922, although it may have been built a few years earlier; its name came from the driving time from the builder's home in Helena (Aaberg 2004a: 105). Ownership of the cabin has changed three times since its construction.

Site integrity has been extensively compromised by refitting and infilling of the original windows and porch portals. Most windows have been completely in-filled with modern wood paneling. However, Aaberg notes that the changes appear to allow for recovery of original features of the cabin (2004a: 106).

The site is recommended eligible under Criteria C based upon recoverable log architecture evocative of the 1920s construction and the quality masonry work represented by the cabin chimney, foundation, and by the stone pool and fountain. This assessment appears optimistic; the site is privately owned, and restoration is unlikely. We are not supportive of National Register eligibility based upon the potential for restoration of lost design elements and overall integrity.

The property is approximately seventy five feet from the edge of the present road. The project will not have a direct or adverse effect to the property or any of its features. Aaberg notes (2004a: 106) "The possibility of increased traffic and increased traffic speed on the paved road could directly affect the site." We feel that assumed increases in traffic and speed cannot be quantified. Existing speed routinely exceeds 50 mph on this straight segment, despite the 35 mph design speed and posting. We do not anticipate indirect adverse effects based upon these assumptions.

24LC1882 is known as The Glenwood, a privately owned cabin, outhouse and outdoor fireplace on land leased from the USFS (Aaberg 2004a: Figure 4). The structures are set back approximately one hundred sixty feet east of the Rimini Road. The cabin was built in approximately 1936; the date of construction for the more modern outhouse and fireplace is unknown. The cabin is a rectangular log house with a stone foundation.

The cabin retains integrity of design and materials, although the roof has been covered with modern roll roofing. The original change in pitch between the roof and porch has been covered, but the integrity of the original construction has not been affected (Aaberg 2004b: 24LC1882 site record and images). Clearly, the integrity of the structure has not been compromised. Aaberg (2004a: 108) recommends National Register eligibility under Criteria C.

The site is well away from the APE of the proposed reconstruction of the road. We do not anticipate any direct or indirect effects to the site from the proposed undertaking, and recommend a determination of no adverse effect for this property.

24LC1884 is a residential cabin on land leased from USFS (Aaberg 2004a: Figure 4). The privately owned cabin was recorded as built in 1940, although the construction materials and style indicate construction in the late 1920s or 1930s. The structure is a one-story wood frame rectangular cabin with clapboard siding. The builder and owner(s) have not been determined. Associated features are a more recently constructed shed and outhouse.

Aaberg (2004b: 24LC1884 site record) provides a detailed description of the cabin. The cabin is remarkably intact and well maintained. All original fabric, including the windows, appears to be present. Aaberg (2004a: 113) recommends National Register eligibility under Criteria C, based upon the integrity of the structure as a well-maintained example of the type of recreational residence constructed in the 1920s and 1930s.

The cabin is more than one hundred fifty feet from the edge of the present road. Aaberg notes (2004a: 114) “The possibility of increased traffic and increased traffic speed on the paved road could directly affect the site.” We feel that assumed increases in traffic and speed cannot be quantified. Existing speed routinely exceeds 50 mph on this straight segment, despite the 35 mph design speed and posting. We do not anticipate indirect adverse effects based upon these assumptions.

24LC1885 is known as the Hamper Cabin; it is a privately owned recreational cabin on land leased from the USFS (Aaberg 2004a: Figure 4). The site consists of a one and one-half story cabin, outhouse and well set back about one hundred fifty feet east of Rimini Road. The cabin has a reported build date of 1928; the builder and owners are not known. Aaberg (2004a: 114) considers that the cabin “...retains integrity of design, materials, and workmanship... reflected in the footprint, original wood siding, windows, and façade arrangement of the cabin. The rustic setting and feeling is also intact.” Aaberg recommends National Register eligibility under Criteria C.

The outhouse and well structures are also recommended eligible under Criteria C because “...they have integrity and enhance the overall recreational and rustic setting and feeling of the cabin.” (Aaberg 2004a: 114). The eligibility recommendations for the entire site are reasonable.

We do not anticipate any adverse effects to the site consequent to the reconstruction of the Rimini Road. The buildings are in excess of one hundred fifty feet from the existing road. Aaberg notes (2004a: 114) “The possibility of increased traffic and increased traffic speed on the paved road could directly affect the site.” We note that increases in traffic and speed are assumptions that cannot be quantified. Current local speed exceeds fifty mph on this straight segment, despite the thirty-five mph design speed and posting. We do not anticipate indirect adverse effects based upon these assumptions.

Historical Properties Not Recommended Eligible

Twelve properties within the area of potential effects were recommended not to be eligible to the National Register (Part B, Tables 1 and 2). These sites are discussed individually in the following text in summary form.

24LC1869 (Aaberg 2004a: Figure 4) consists of the foundations associated with the Tenmile water plant manager's residence, dating to the late 1920s or 1930s. The property is owned by the City of Helena. The structures were removed in 1989 or 1990. The foundations appear to represent the residence and a well.

Aaberg (2004a: 87) does not recommend National Register eligibility for the site due to the loss of the structures and the lack of association. The site is well outside of the area of potential effects. No further consideration is recommended or warranted for this site.

24LC1870 consists of the remnants of a log stringer and crib abutment bridge (Aaberg 2004a: Figure 4) that formerly crossed Tenmile Creek. The site is privately owned. The bridge location does not correspond with the location of any mapped historical road or feature; it is attributed to a private crossing to an agricultural field. The construction consists of insubstantial log stringer to log crib abutments, fairly informal in construction, and clearly not suited to heavy traffic.

Aaberg (2004a: 88) considers the bridge not to be potentially eligible to the National Register, due to a lack of physical integrity and association. We concur with that recommendation.

24LC1871 is a single circular prospect pit and tailings pile on private land (Aaberg 2004a: Figure 4). A similar prospect pit is located well outside of the survey corridor about one hundred eighty feet upslope and to the north. The feature within the APE is approximately eighteen feet in diameter and five feet in depth. The tailings pile is approximately thirty feet by thirty six feet. There were no associated artifacts with the feature; the appearance suggested that it had been excavated some time ago.

Aaberg (2004a: 89) considers the hand-excavated pit to date to the earlier period of active mining and prospecting. The feature is not associated with a known claim, and cannot be otherwise dated. The feature is recommended not to be eligible to the National Register; we concur with that recommendation.

24LC1873 is a trash dump on private land (Aaberg 2004a: Figure 4) dating from the late 1940s through the 1960s located between the historical wagon road and the NPR grade. Aaberg (2004a: 92) considers the dump to likely be associated with a former landowner; it cannot be associated with either historical feature due to the age difference. He does not consider the dump to be extremely old, and it is not otherwise associated with other features or occupations in the area. The artifacts are of modern mass manufacture, and do not have the potential to offer significant information under Criteria D. We concur with the recommendation that the dump is not potentially eligible to the National Register.

24LC1874 appears to be a subsistence placer mining camp, now collapsed and in ruin, on lands managed by the USFS (Aaberg 2004a: Figure 4). Features include the collapsed remains of a shed or shack, an adjacent circular depression, a nearby placer cut, and a can dump about one

hundred twenty feet south of the collapsed shack. A probable claim stake and claim cairn is also present. The site is on USFS lands west of Tenmile Creek and approximately ninety feet west of the Rimini Road as well. The site is completely outside of the APE.

There is no standing architecture; the collapsed structure is a rectangular mound of rotted logs on a probable stone rubble foundation. All artifacts appear to date from the 1940s to 1950s. Aaberg (2004a: 94) considers the site to be a short-term placer mining camp, but not associated with any known mining claim. The site is not recommended as potentially eligible, and we recommend concurrence with that recommendation.

24LC1875 consists of a trash/can dump on lands administered by the USFS, between Tenmile Creek and the Rimini Road (Aaberg 2004a: Figure 4). The dump occupies a natural depression and appears to postdate 1920; remains consist of tire inner tube fragment, various food and industrial product cans, and saw-cut bone fragments. The depression is consistent with local flood scour. The remains are assessed as a short-term or single use dump (Aaberg 2004a: 94) from a Rimini resident, a short distance upstream of the site.

Aaberg (2004a: 95) considers the dump to have very low information value, not associated with the early mining history of Rimini or local residential or industrial features. The site is recommended as ineligible to the National Register. We concur with that assessment.

24LC1883 is a historical residential cabin on land leased from USFS on the same tract as 24CL1882, 1884 and 1885 (Aaberg 2004a: Figure 4). The cabin privately owned, and is a small wood frame cabin with a small ridge over the old Helena Water Supply Ditch, an outhouse, fireplace, a well house and a masonry wall. A build date of 1928 is indicated in the assessor's record; the original builder and owner are unknown (Aaberg 2004a: 109).

The structure has been extensively modified. The original siding has been replaced or covered with clapboard siding, and the original screened porch has been enclosed. The majority of the windows have been replaced with modern sliding sash windows. The appearance has been markedly compromised. Aaberg (2004a: 110) considers the site is not eligible to the National Register, and we concur with that assessment.

24LC1876 is the first treated timber bridge on Rimini Road over Tenmile Creek (Aaberg 2004a: Figure 4) approximately 1.1 miles south of Highway 12. Lewis and Clark County maintains the bridge. The bridge was constructed in 1955 according to Montana Department of Transportation records (Aaberg 2004a: 95). The location is consistent with the grade for the old Montana Central Railroad, although extensive road maintenance and the probable replacement of several bridges due to periodic high-energy floods over the years have rendered any original railroad bridge crossing irrelevant.

Aaberg (2004a: 96) notes "...the bridge retains reasonable integrity and is representative of the many timber bridges built in the county and the state...", although it "...is not an outstanding example of its type, style, or method of construction and does not exhibit any extraordinary qualities necessary for a feature under 50 years of age to be determined significant." The bridge is not recommended to be eligible, and we concur with that assessment.

24LC1877 is a pedestrian footbridge maintained by Lewis and Clark County crossing Tenmile Creek (Aaberg 2004a: Figure 4) to the infrastructure of the Helena water system. It is a relatively recent pole bridge supported by timber piles and railroad tie abutments. The bridge is two and one-half feet wide and fifty-four feet long, with two inch by 10 inch decking and handrails of one inch by six inch boards. The bridge is apparently associated with the Helena water system maintenance.

No information concerning the date or builders of the bridge was located. The bridge is sixty one feet from the present road, and the road will not be moved closer to Tenmile Creek; no effects to the structure are anticipated. The bridge appears to be of vernacular construction, and is not felt to represent a significant type, style, or method of construction. It is not recommended eligible (Aaberg 2004a: 96-97), and we concur with that conclusion.

24LC1878 is the third timber road bridge on the Rimini Road over Tenmile Creek (Aaberg 2004a: Figure 4) approximately 2.4 miles south-southwest of the junction with Highway 12. Built in 1955, the bridge is maintained by Lewis and Clark County. It is a single-span, treated timber bridge 37.2 feet long and 23.4 feet wide; it is supported by seven timber piles on each end hand has timber back and wing walls. Twelve timber stringers rest on the timber piles and extend into the abutments. The deck is constructed of 2" by 4" boards laid on end and covered by gravel.

The present road has been in place since 1886. It began to be used as the road of preference at the time of its completion and abandonment until it was adopted as a county road in 1908 by petition over the former MCR grade. As with the first timber bridge (24LC1876), the bridge retains good integrity, but was constructed in 1955 and does not appear to have been associated with any significant event or persons in history. It is not an outstanding example of its type, style, or method of construction, and does not exhibit any extraordinary qualities that recommend significance. Aaberg (2004a: 98) recommends the bridge not to be eligible to the National Register, and we concur with that recommendation.

24LC1880 is the fourth timber road bridge on the Rimini Road over Tenmile Creek, approximately 3.3 miles south-southwest of the junction with Highway 12 (Aaberg 2004a: Figure 4). Lewis and Clark County maintains the bridge. It is a single-span, treated timber bridge 43.3 feet long and 23.4 feet wide; it is supported by seven timber piles on each end hand has timber back and wing walls. Reinforced formed concrete back and wing walls support ten timber stringers. The deck is of 2" by 4' boards laid on end and covered by gravel.

The bridge retains good integrity. However, as with the other bridges, it was constructed in 1955 and does not appear to have been associated with any significant event or persons in history, and is not an outstanding example of its type, style, or method of construction, and does not exhibit any extraordinary qualities that recommend significance. Aaberg (2004a: 98) recommends the bridge not to be eligible to the National Register, and we concur with that recommendation.

24LC1873 is a trash dump on private lands dating from the late 1940s through the 1960s, located between the former NPR grade and the historical wagon road (Aaberg 2004a: Figure 4), approximately sixty five feet west of Rimini Road. The dump extends for approximately eighty two feet along the grade. Dump items are exclusively of residential and culinary items (beer and

pop cans and bottles, pie plates, an auto body with a 1955 plate, plastic baby seat, et. al. The dump is consistent with off-site disposal of residential debris utilizing the former railroad grade for access to the site.

Aaberg (2004a: 92) does not assign any particular significance to the site. It is not associated with any mining site or the local mining district context or particular residence, and the materials are all of recent, mass-produced origin. The site does not have the potential to relate to relevant local or mining research. We concur with Aaberg's assessment of the site.

Eligible Properties Adversely Affected

Two historic properties will be adversely affected by the proposed undertaking (Table 3). Effects to 24LC1268 and 24LC1868 will be adverse because of effects to the physical integrity of significant contributing elements of both sites. These are discussed in order below.

24LC1268 is the Northern Pacific Railroad Helena-Red Mountain Line, present along the west side of Rimini Road from a point just south of Walker Creek, then into and beyond Rimini (Aaberg 2004a: Figure 4). The line was completed in 1886 and operated for 38 years. The line was no longer operating in 1925, with the tracks removed shortly thereafter.

Adverse effects will occur from reconstruction and realignment of segments of the existing road and reconstruction of the bridges. Several sections of the Northern Pacific Railroad grade will be removed or otherwise impacted. These impacts will necessitate a separate Section 4(f) analysis by WFLHD.

The removal of segments of the former grade will result in the loss of integrity of the grade at those locations. Recommended mitigation actions include photo documentation and detailed recording of engineering and dimensional attributes, further archival research for engineering detail and personnel, and historic photo-archival research (Aaberg 2004a: 64).

Areas of the site outside of the construction limits will be delineated with construction fencing to prevent inadvertent entry during the life of the project.

24LC1868 is the Old Helena Water Supply Ditch (Aaberg 2004a: Figure 4), thought to date to the 1860s. The ditch is positively known to exist on an 1897 map. The City of Helena acquired the ditch in 1910-1911, and carried out upgrades in 1915 or 1916. Aaberg (2004: 77) notes the ditch is the single largest component of Helena's early water system, and remains a significant source of water to this day.

The ditch originally extended for about 8.5 miles from the treatment plant through Rimini. Portions of the ditch south of Minnehaha Creek have been destroyed by road construction and other developments. North of Minnehaha Creek and to where the ditch intersects the road approximately 1.1 miles south of the intersection with Highway 12, the ditch is in very good condition. Some segments exhibit fine stone and mortar work, and others exhibit good dry laid stonework.

Aaberg (2004a; 2004b) presents a fairly extensive context for the ditch and water system; he considers the ditch and flume along the east side of the road between Minnehaha Creek and the

former water system to be the oldest surviving feature in the Tenmile drainage (2004a: 80). This section of the water system is relatively intact, with good integrity, exhibiting the full range of construction techniques including mortared and dry-laid stone sections, stone flume platform sections, as well as simple dirt segments (2004b; 24LC1868 site form images). The ditch is unquestionably eligible to the National Register under Criteria A through D.

Segments of the ditch will be destroyed by widening and realignment of the Rimini Road. The loss of these feature elements will result in the loss of integrity to significant components of the water system. It is recommended that these adverse effects be mitigated by data recovery including GPS mapping of the entire water system, additional archival research in local Helena resources mentioned by Aaberg (2004a: 86), and thorough mapping and photography of all ditch features.

Data recovery recommendations at the two adversely affected sites include photo-documentation of the features and GPS mapping of the entire features (Aaberg 2004a: 178) supplemented by archival research. Recommended sources include the James Hill Library in Minnesota and various railroad museums and archives, including the National Archives and Records Administration. Local sources may have information on construction history of the railroads, Tenmile ditch and other affected features.

Eligible Properties Not Adversely Affected

Nine other historic properties recommended eligible and ten properties recommended not eligible are within the general project area outside of the area of direct potential effect (Table 3). Eight of the nine properties recommended eligible are of a structural nature without an archaeological component; the ninth site is the fragmentary pictograph well outside of the APE.

As discussed individually above, each of the nine properties outside of the area of immediate effect will be avoided during construction. With the exception of the historic Moose Creek Ranger Station, the properties are privately owned and outside of the construction limits. Provided that the structures are avoided, there will not be any direct effects to the properties. The setting of these structures is not a component of their eligibility; hence the reconstruction and surfacing of the road will not have an adverse effect.

The historical pictograph will not be adversely affected. It is well outside and above the present road and potential project, and there is no potential effect that can occur.

The ten remaining historical properties and sites not recommended eligible would not be directly affected. Provided they remain ineligible, there will be no indirect effect.

Recommendations for Findings of Effect

Table 3 presents our recommendations for National Register eligibility and preliminary recommended effect based upon Aaberg's (2004a; 2004b; 2004c) recommendations.

Table 3. Recommended Effects to Cultural Resource Properties Within the Rimini Road Project (Ordered by Within/Outside APE)

Site Number	Description	NRHP Eligibility	Recommended Effect
Part A. Sites Within the Area of Potential Effect			
24LC935	Camp Rimini-CCC Camp & WWII sled dog training center	Reconsider/ Eligible	No Adverse Effect
24LC1268	Northern Pacific Railroad grade	Eligible	Adverse
24LC1608	Moose Creek Ranger Station/historic cabin and garage	Eligible	No Adverse Effect
24LC1866	old Montana Central Railroad grade/current county road	Eligible	No Adverse Effect
24LC1867	old wagon road to Rimini	Eligible	No Adverse Effect
24LC1868	Tenmile Ditch/Old Helena water supply ditch	Eligible	Adverse
24LC1869	Tenmile water plant manager's residence foundations	Not eligible	No Effect
24LC1870	remnants of crib bridge	Not eligible	No Effect
24LC1871	prospect pit	Not eligible	No Effect
24LC1872	historical sign/pictograph	Further study required	No Adverse Effect
24LC1873	trash dump	Not eligible	No Effect
24LC1874	subsistence placer mining camp	Not eligible	No Effect
24LC1875	trash/can dump	Not eligible	No Effect
24LC1876	timber road bridge (#1)	Not eligible	No Effect
24LC1877	foot bridge	Not eligible	No Effect
24LC1878	timber road bridge (#3)	Not eligible	No Effect
24LC1879	Pine Ridge Associates Ranch/farmstead	Eligible	No Adverse Effect
24LC1880	timber road bridge (#4)	Not eligible	No Effect
24LC1881	Cabin (45 Minutes From Broadway)	Eligible	No Adverse Effect
24LC1882	The Glenwood	Eligible	No Adverse Effect
24LC1883	Historical residential cabin	Not eligible	No Adverse Effect

Site Number	Description	NRHP Eligibility	Recommended Effect
24LC1884	Historic residential cabin	Eligible	No Adverse Effect
24LC1885	Hamper Cabin	Eligible	No Adverse Effect
Part B. Cultural Resource Properties Outside the 100' Area of Potential Effect (Extended Coverage Area & Rimini)			
24LC1886	Hughes Cabin	Eligible	No Effect***
24LC1887	Brown House/historic residence	Eligible	No Effect
24LC1888	Weston Property	Eligible	No Effect
24LC1889	Eakin House	Not eligible	Not eligible N/A
24LC1890	Sorth Cabin	Eligible	No Effect
24LC1891	Silberling House	Eligible	No Effect
24LC1892	Gott Cabin	Not eligible	Not eligible N/A
24LC1893	James House/Rimini Hotel?	Not eligible	Not eligible N/A
24LC1894	false front store	Eligible	No Effect
24LC1895	log house and frame house	Not eligible	Not eligible N/A
24LC1896	Red Mountain Tavern	Eligible	No Effect
24LC1897	Headquarters Saloon	Eligible	No Effect
24LC1898	log garage/livery	Eligible	No Effect
24LC1899	log cabin	Eligible	No Effect
24LC1900	historic house and garage	Eligible	No Effect
24LC1901	historic cabin	Eligible	No Effect
24LC1902	Cathy Maynard Office	Eligible	No Effect
24LC1903	Baumann House	Not eligible	Not eligible N/A
24LC1904	Bovington House	Not eligible	Not eligible N/A
24LC1905	Vercellin House	Eligible	No Effect
24LC1906	Rose Wilson store/residence	Eligible	No Effect
24LC1907	McDaniel residence	Not eligible	Not eligible N/A
24LC1908	Pickett House	Eligible	No Effect
24LC1909	Gulden House	Eligible	No Effect
24LC1910	Rimini School	Eligible	No Effect

Site Number	Description	NRHP Eligibility	Recommended Effect
24LC1911	Boundy House	Not eligible	Not eligible N/A
24LC1912	Moore House	Not eligible	Not eligible N/A
24LC1913	Thompson cabins	Not eligible	Not eligible N/A
24LC1914	Banks Cabin	Not eligible	Not eligible N/A

***No Effect as these properties are not within the Area of Potential Effect

To summarize, adverse effects will result for sites 24LC1268 and 24LC1868. In a March 14, 2008 letter (enclosed), the Montana State Historic Preservation Office (SHPO) concurred with our preliminary findings listed in Table 3. A letter with the final effects determinations and recommended adverse effect mitigation outlined above has been sent to the SHPO, Blackfeet Nation Tribe, Confederated Salish and Kootenai Tribes, USFS, MDT, Lewis and Clark County, and City of Helena, and has been made available to the public. It should be noted that the Blackfeet Nation Tribe and Confederated Salish and Kootenai Tribes have not replied to the WFLHD letters requesting information about concerns or interests in the project area or our requests for concurrence with the above findings.

If you have any questions, or should you require any additional information, please contact Michael Schurke at the above address, by phone at (360) 619-7636, or by e-mail at michael.schurke@fhwa.dot.gov.

Sincerely,



Michael Schurke
Cultural Resource Protection Specialist

cc: Project file
Erin Chipps (WFLHD)
Michael Schurke (WFLHD)
Greg Gifford (WFLHD)
Maryann Naber (FHWA Headquarters)

Enclosures: Figure 2 project vicinity map from Aaberg 2004a
Figure 4 map of site locations from Aaberg 2004a
A copy of the March 14, 2008 SHPO letter

References Cited

- Aaberg, Stephen, Christine Wiltberger, Jayme Green, and Chris Crofutt.
- 2004a Rimini Road Federal Highway Administration Project MT PFH 98-(1). Class III Cultural Resource Survey Results, Lewis and Clark County, Montana. Volume I: Management Report. Aaberg Cultural Resource Consulting Service, Inc. Billings, MT.
- 2004b Rimini Road Federal Highway Administration Project MT PFH 98-(1). Class III Cultural Resource Survey Results, Lewis and Clark County, Montana. .
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- 2004c Rimini Road Federal Highway Administration Project MT PFH 98-(1). Class III Cultural Resource Survey Results, Lewis and Clark County, Montana. Volume III: Site Forms, Maps & Photographs for sites outside Area of Potential Direct Effects in Area of Extended Coverage. 24LC1886-1914. Aaberg Cultural Resource Consulting Service, Inc. Billings, MT.
- USDA Forest Service, Helena N.F. Heritage Resources Webpage, Moose Creek Ranger Station. MS on file at USFS website.
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