



Counterpoints to Assertions in the 2020 Opposition Petition

The Big Sky Country National Heritage Area, as currently proposed for Cascade and Chouteau counties, would create a designation similar to a tourism region. Like other NHAs around the country, this NHA will stimulate economic growth and promote the nationally significant historical, cultural and natural resources in our area. It will not interfere in any way with private land holdings nor will it have any regulatory authority. In short, there are really no potential negative impacts of receiving federal designation for an NHA.

Opponents to the Big Sky Country NHA effort launched a petition proclaiming their rationale for opposing NHA designation. The actual petition words are reproduced in bold font below, and the response to each assertion is offered in standard font.

WHEREAS the proposed Big Sky Country National Heritage Area (BSCNHA) will include all of Cascade County and a portion of Chouteau County without notice to or the consent of the thousands of private property owners who will become subject to the BSCNHA;

Congress decides on the final boundary for the NHA. As required, BSCNHA has proposed a project area based on the places, stories and the supporting resources that local citizens identified as important to our national heritage.

The NHA initially focused on the Missouri River segment through important Lewis & Clark sites in the area. However, the public expressed a desire to include historic and cultural sites and resources that are not along the Missouri River – the Monarch Depot, Fort Shaw, Ulm Community Center, St. Peter’s Mission, First People’s Buffalo Jump, Charlie M. Russell Museum, Children’s Museum of Montana, MAFB museum, The History Museum, Ursuline Academy, and more. Limiting the project area to only the river course would eliminate the opportunity to collaborate with willing partners on places that citizens believe are important to our national heritage. Therefore, the proposed project area currently includes the entirety of Cascade County and a portion of Chouteau County from the Cascade-Chouteau County line downstream along the Missouri River to Decision Point, near Loma. The Feasibility Study delineates the rationale for the proposed boundaries in detail, visit www.bigskycountrynha.org. The 45-day public comment period on the draft Feasibility Study and the public meetings held during the process provided opportunity for comment on the proposed project area.

All NHAs have private land within their boundaries in order to encompass those historic, cultural and natural resources treasured by local citizens. The entire state of Tennessee is an NHA, obviously including much privately-owned land. The argument that all landowners within Cascade County and the portion of Chouteau County within the boundary should have been personally notified and provided their assent, is not justified when no property rights would be altered now or in the future by having an NHA designation. NHAs only work with willing landowners on projects, and no one is ever required to participate in a project unless they desire to do so.

WHEREAS management of the proposed BSCNHA will be vested in a private organization whose directors are not elected by or accountable to any of the property owners or voters within BSCNHA;

The Big Sky Country NHA Board of Directors are volunteers who have an interest in their communities, their history and their neighbors. Like all 501(c)(3) non-profit organizations, no board members can receive financial gain from their work on this board. The board simply facilitates bringing people together to work on mutually agreeable projects with willing partners. Like museum boards, civic clubs and service organizations, the BSCNHA board has no authority to control or regulate anything. Its sole

purpose is to advance the understanding and appreciation of local sites and to honor the stories of our ancestors.

WHEREAS the establishment of BSCNHA would add an unnecessary and duplicative layer of federal oversight through the National Park Service on top of the local, state and federal regulations and programs already in place to promote the economy and preserve the history and heritage of Central Montana;

NHAs were created by President Ronald Reagan (1984) to actually save taxpayer funding and to empower local control over the interpretation and care of local historic sites. They are public-private partnerships, in which the federal government plays a subordinate role to locally initiated and driven efforts to nurture and celebrate the most important elements of America's heritage. It was founded by the Reagan administration BECAUSE it would preserve history and heritage with FAR LESS reliance on the government and at far less cost than establishing additional federally run parks, monuments, and centers. Having an NHA saves federal funding because local communities through partnerships maintain these sites. The local partnerships established with NHA assistance are more cost-effective than creating a new National Park unit, which requires the hiring of federal employees, office space and ongoing operational responsibilities, all which would be totally financed with federal appropriations.

WHEREAS the establishment of a National Heritage Area would adversely affect private property rights by influencing local officials to pass zoning laws and regulations not otherwise needed and by promoting preferred uses of land to the exclusion of others, impairing the right of private property owners to use and enjoy their properties as they determine to be appropriate;

At no time has it been proven that NHAs have adversely affected private property rights or influenced local officials to change any regulations. A 2004 Government Accounting Office (GAO) review of all NHAs found no evidence of any infringement on private property rights due to an NHA.

The NHA Board of Directors (or *Coordinating Entity*) does not have the authority to control or change local city/county laws, regulations or ordinances, nor any state or federal regulations. Only elected officials have that authority, and any changes require considerable public engagement. Local, state, and federal governments have very public processes requiring public hearings, planning board reviews, and city/county commission meetings that include public engagement before decisions are made.

A 2016 report from the Congressional Research Service addressed the private property rights issue with this statement: "Many laws establishing national heritage areas contain provisions intended to address concerns about potential loss of, or restrictions on use of, private property as a result of NHA designation. For example, P.L. 111-11, which established the nine newest NHAs (as of 2016), stated for each area that the law does not abridge the right of any property owner; require any property owner to permit public access to the property; alter any land use regulation; or diminish the authority of the state to manage fish and wildlife, including the regulation of fishing and hunting within the NHA."

Federal legislation prohibits NHAs from using federal funds to purchase land/property. The legislation does not prohibit an NHA from purchasing land/property with non-federal funds, and many NHAs have purchased or leased buildings for their operations. In some instances, an NHA *Coordinating Entity* has purchased land/property from a willing seller at an agreed-upon, fair-market price.

An NHA does not possess condemnation or eminent domain powers.

In summary, NHA *Coordinating Entities* are non-elected boards with no jurisdictional authority to create or change federal, state, tribal, or local regulations. The implication that zoning regulations have been altered as a result of NHA designation has not been proven by the opposition; rather they have only suggested that it has happened or may happen sometime in the future. The opposition has provided no evidence that a landowner has ever had to change their land management practices or been forced to sell their private property to an NHA.

WHEREAS we oppose allocating additional taxpayer dollars to BSCNHA when the National Park Service has insufficient resources and personnel to manage the existing national parks, including deferred maintenance backlogs of over \$131 million and \$585 million in Glacier and Yellowstone National Parks respectively;

National Parks receive appropriations from a specific line item in the federal budget governed by limits set in a federal budget agreement. Funding for NHAs is allocated from a completely separate line item than National Parks.

The argument that reducing funding for NHAs could be used to subsidize National Parks is not supportable, because National Park funding levels are set in a federal budget agreement. Even if NHAs are not funded, those federal funds are not re-directed to National Parks, like Yellowstone or Glacier. Likewise, by law any unspent federal monies allocated to a particular NHA remain within the NHA appropriation to be redistributed to other NHAs in other parts of the country. If the NHA money is not used, and not redistributed to another NHA, it is returned to the U.S. Treasury.

The concern about deferred maintenance is now a moot point, as it has been addressed separately. President Trump signed the Great American Outdoors Act (H.R. 1957) into law (Public Law No. 116-152) on August 4, 2020, designating \$12 billion over the next five years to resolve the National Park maintenance backlog issue. The title of this act is: *An Act to amend title 54, United States Code, to establish, fund, and provide for the use of amounts in a National Parks and Public Land Legacy Restoration Fund to address the maintenance backlog of the National Park Service, the United States Fish and Wildlife Service, the Bureau of Land Management, the Forest Service, and the Bureau of Indian Education, and to provide permanent dedicated funding for the Land and Water Conservation Fund, and for other purposes.*

WHEREAS none of the National Heritage Areas in existence today have become self-sufficient and are chronically dependent upon additional federal funding at taxpayer expense;

Federal appropriations to NHAs are “seed funds” designed to attract additional investment (state, local, private foundations and donors). If federal funds were not allocated, matching non-federal investments would diminish. NHAs were never intended to be “self-sufficient.” Instead, the federal appropriations serve as a multiplier factor stimulating economic growth in communities. NHAs are designed to be reauthorized by Congress every ten years, and if reauthorized, their receipt of federal funds continues. Congress can choose not to reauthorize an NHA when it reaches its reauthorization date. The reauthorization and additional funding are contingent on a comprehensive evaluation of an NHA’s operations, adherence to the legislation and management plan, and community desire to continue. Nothing is automatic nor guaranteed.

NHAs must match federal funds one-to-one, and the match can be with cash or in-kind contributions. Annually, each NHA must provide a fiscal report to validate their match and any expenditure of federal funds. Economic Impact Assessments are routinely prepared to ascertain the economic growth of NHAs.

Rivers of Steel NHA created in 1996 - An August 2020 economic impact assessment prepared by an independent private group for the Rivers of Steel NHA in Pittsburgh, PA confirms NHAs are economic drivers for their communities. The independent impact report indicates the activities of the Rivers of Steel support the generation of more than \$92 million of economic benefit and 922 jobs each year.

More than 25,000 individuals visit Rivers of Steel attractions or programs annually and 400,000 more visit the region to enjoy programs offered by partner organizations who collaborate with Rivers of Steel to showcase the region. These visitors invest millions of dollars that ripple through the 8-county region in the form of increased revenue for businesses, income and jobs, and revenues for municipalities, counties and state government from new and existing taxable developments. The multiplier effect

provides positive economic growth in communities. Rivers of Steel on average awards \$71,000 in grants for partner organizations who have projects in mind. The annual budget for Rivers of Steel is \$2.5 million, of that amount they receive \$644,000 in federal appropriations, a tremendous return on a federal investment.

Abraham Lincoln National Heritage Area created in 2008 – A 2017 economic impact assessment prepared by Tripp Umbach, an independent private group revealed the economic impact of this NHA is \$258.6 million annually through a combination of tourism driven by the presence of the NHA (approx. \$257 million) and operations of the NHA (approx. \$1 million). This NHA supports a substantial number of jobs in the region – total employment impact is 3,234 jobs (2,557 direct jobs and 677 indirect jobs).

The NHA also supports state and local government with the generation of tax revenues. This NHA generates over \$25.5 million in tax revenue annually for municipalities, counties and state government. NHAs thrive in the free market. They bring together businesses, governments, communities, and citizens, in ways that give birth to creative economies that generate tax revenues and create jobs.

Response to verbal and written concerns by those in opposition

1. Concern that the *Coordinating Entity* is a non-elected board, so the general public does not control who is selected to be on the NHA board of directors.

Many organizations - Rotary, Boys and Girls Clubs, YWCA, NeighborWorks, Great Falls Development Authority, Chambers of Commerce and many more – function with non-elected boards. Most *Coordinating Entities* for NHAs are non-profit organizations, although the Tennessee Civil War NHA is coordinated through the state university system. Nonprofit organizations are highly regulated by state laws, and subject to federal (IRS) scrutiny. Annual reports must be made to maintain donor status, and to retain tax-exempt status. There are a number of watchdog groups (*Charity Navigator* and *GuideStar*) that score and rate nonprofits, and these websites make public a nonprofit's IRS filings, annual reports, and audits.

Additionally, NHA *Coordinating Entities* are accountable to Congress for any federal monies they receive. Those annual reports are in the public domain.

2. The Silos and Smokestacks NHA promised to assist farmers and ranchers and that help never materialized.

In conversations with the S&SNHA staff, the following facts were relayed:

The idea that “helping farmers” was the charge of the Silos and Smokestacks NHA is not true. The stated purpose in their Articles of Incorporation is “...to create an agricultural museum and park in Waterloo, Iowa and other non-profit educational institutions located in Northeast Iowa; to provide interpretive programs and educational experiences for children, future farmers and other persons interested in the heritage of agriculture and the heritage of the industrialization which occurred to meet agricultural needs; and to provide Americans a more complete understanding of their heritage and their roots in agriculture..”

Silos and Smokestacks NHA tells and preserves the story of American agriculture. Their *Coordinating Entity* has specific policy stating that the organization will not own or manage any farmland or conservation land. The NHA's focus is on telling the story of the many farmers who own and capably manage their own private farmland. Their website (www.silosandsmokestacks.org) states 115 partner sites help them tell the story. A handful of these sites are working farms. All of their sites, whether farms or not farms, have **chosen** to be a partner with the Silos and Smokestacks NHA. The operating farms that choose to partner with them develop their own system for hosting visitors and telling their story. As with all their sites, the NHA provides help developing their farm or family story and technical assistance on how to make a visitor experience a positive one for those who come to their farm. The landowners manage all the details of who visits their farm, when they come and how much if any fee is charged to visitors. All fees are kept by the farmer/site.

3. The Wheeling, WV NHA proposed to convert 90 percent of downtown Wheeling into a Victorian-themed outlet mall. This plan would have condemned properties and transferred them from their present owners to private retail business chosen by city officials. The WV Supreme Court ruled the financing of the plan unconstitutional.

The former Director of the Wheeling WV NHA shared this information:

The Wheeling National Heritage Area Corporation (WNHAC) in partnership with the city of Wheeling, Regional Economic Development (RED) Partnership and a private developer/management entity studied the feasibility of developing an outlet mall repurposing existing structures in the central business district of Wheeling. Wheeling is rich in Victorian architecture and is often referred to as “Victorian Wheeling.”

All transactions were to be between a willing buyer and willing sellers at fair market value. No eminent domain was contemplated by the city of Wheeling.

As an early action before the proposed outlet mall, WNHAC created a facade loan program open to all. Initially, three highly visible Victorian structures with viable businesses were selected to participate from more than a dozen applicants. Working with the owners, WNHAC contracted with an architectural firm to develop proposed facade renovations, address life safety and ADA issues. Again, this was in complete cooperation with existing property owners. The single condition placed on the owner was that the property had to be maintained. Shortly after the start of the program, the “loans” were converted to grants.

With interested and willing property owners, WNHAC provided at no cost an historic structure feasibility analysis. The studies included assessment of the structure, proposed facade improvements, anticipated budget, and technical assistance to the property owner in applying for available grants and qualifying for the federal Investment Tax Credit program. The program was voluntary and at no time were property owners required to participate.

A large public hearing was held regarding the outlet mall concept. Most participants, but not all, spoke in favor of the concept and the revitalization of downtown Wheeling. However, when anticipated funding did not become available, the aforementioned partners abandoned the outlet mall concept. State funding initially sought for the outlet mall project was invested in developing an Interstate interchange five miles outside the city that secured the development of a large big-box mall. This further diminished the small, locally owned retail presence in the central business district of downtown Wheeling. Meanwhile, the city of Wheeling through WNHAC became part of the National Main Street Program. The facade improvement grant program continues to provide free technical assistance to willing property owners.

4. There is a lack of transparency, private land is included within the NHA without the owner’s consent and no notification was given to landowners.

Most NHAs have private land within their project area. The Tennessee Civil War NHA encompasses the entire state, all 95 counties. As the NHA Executive Director Carroll Van West relayed in the September 23, 2020 guest opinion piece in the Fort Benton River Press, *“In its 20 years, the Tennessee Civil War National Heritage Area has never been involved in land use controls, land use regulations, none of those things. Tennesseans are a conservative bunch who believe fiercely in local decision-making. The Heritage Area embraces that philosophy, and assists those who wish to take advantage of its programs and expertise. Heritage Areas are no threats to your rights and your property; they are the most efficient way for federal dollars--matched by monies, time, and resources from local groups, citizens, and governments—to enhance the region’s heritage tourism potential, create greater pride of place and community to keep more of the next generation here.”*

BSCNHA made every attempt to keep the public informed of the NHA effort through news articles in local daily and weekly newspapers, radio PSAs and radio talk programs, notifications on the www.bigskycountrynha.org website, through electronic postcards mailings to over 400 individuals on a Constant Contact list, and through presentations to County Commissioners, Town Councils, state officials, and civic organizations in Lewis and Clark, Cascade and Chouteau Counties. BSCNHA has made or conducted over 55 presentations/public meetings about the NHA effort. Notification of these meetings was very extensive, and the meetings were open to the public. Because private property is not impacted by NHA designation, individual notifications to every landowner in both counties was not done, as other notice methods were extensive.

5. Concerns about the Yuma Crossing NHA designation - the potential for additional federal oversight, the fear of adverse impacts on private property rights and impacts to zoning restrictions.

In a report to the Subcommittee on National Parks, Forests and Public Lands Committee on Natural Resources, U.S. House of Representatives in April 2019, an article titled: *Dispelling Myths and Falsehoods on the Issue of Private Property Rights and National Heritage Areas* in Appendix B includes the following information:

Authorized in 2000, this NHA in southwestern Arizona focused its efforts on the restoration of seven miles of the Lower Colorado River. A widely popular Management Plan was approved in 2002, and work began on such projects on riverfront parks and wetlands restoration. Then, however, fears that private property rights were endangered surfaced in 2003. YCNHA and the local Farm Bureau worked to allay the fears by (1) aligning the originally-authorized area to the Management Plan area, (2) having the County and City legislative bodies pass resolutions directing its planning agencies to never use the NHA as a **pretext** for any regulatory action, and (3) including area farmers on the NHA Board.

Patricia Ware, a third-generation farmer, was appointed to the Board in 2005 and over time became YCNHA Chairperson. She was continually frustrated by the falsehoods spread by such groups as the DC-based Heritage Foundation and she wrote letter to the organization. She defended the great work of the YCNHA and concluded by stating that: "Private property rights are the fundamental basis of our way of life(farming). But so is the truth," and then went on to ask that the Heritage Foundation stop spreading lies about Yuma. She never received a response.

6. Landowner from Big Sandy, MT contends the Upper Missouri River Breaks National Monument designation has impacted private property and grazing, diminished land values and increased taxes for property owners and suggests BSCNHA could do the same to landowners.

In researching this rancher's contentions, several facts about the National Monument and the private property were revealed:

- PRIOR to the National Monument designation, the private landowner willingly sold a conservation easement on Slaughter River to the Bureau of Land Management at appraised, agreed-upon, fair market value. The conservation easement is used by the BLM as a public campsite for floaters on the Upper Missouri River.
- The landowner charges a user fee to Missouri River floaters who request access along a private road on the ranch to put-in or take-out river gear.
- It is not uncommon for property values to decrease when a pre-existing encumbrance, like a conservation easement, exists on a property.
- The BLM confirmed no restrictions were placed on private properties as a result of the National Monument designation. Private land is managed as the property owner chooses.
- Grazing leases on federal lands are a privilege and not a right. Federal lands are public property, owned by the citizens of the nation. Routinely, federal agencies conduct onsite reviews of federal grazing leases to ensure grazing standards and guidelines are followed and the federal lands are properly functioning and in acceptable condition. If range conditions deteriorate, the federal agency can change the grazing practices, rotation patterns and/or number of animal unit months (AUMs) permitted in the lease. Again, these changes only affect federal land grazing permittees, not private land. And modifications to a grazing permit are made based on land condition, not the National Monument designation.
- There is no evidence property taxes increased due to the National Monument designation.

7. Changing the name from the Upper Missouri River Heritage Area Planning Corporation, Inc. to Big Sky Country National Heritage Area, Inc. was intended to confuse people, so the NHA effort could not be tracked.

When the 501(c)(3) organization was established in 2016, the board of directors created an initial name linked to the geography of the region. The name was considered the corporation's name, not the name for the actual NHA. The original name was too long and not overly exciting from a marketing standpoint. The board of directors also realized the term "Upper Missouri River" could be associated with Nebraska, South Dakota, or North Dakota. For nearly a year, the board of directors contemplated many other names for the NHA and finally chose the name, *Big Sky Country*, as it truly represents Montana. There was no ulterior motive for changing the NHA name; it was simply a marketing consideration.

8. The National Park Service surveys lands near proposed NHAs to create new National Parks. The Cane River NHA in Louisiana forced the establishment of a new National Historical Park, and it could happen with BSCNHA.

The presumption that the NPS surveys lands for new National Park units is not true, and the Cane River NHA circumstances have not been accurately or fully disclosed by those in opposition to BSCNHA. Following is information provided by Nancy Morgan who served for seven years as Executive Director of the Cane River NHA:

Cane River National Heritage Area and Cane River Creole National Historical Park are bound together by their overlapping enabling legislation (Public Law 103-499) to assist one another in the preservation and interpretation of the Cane River region. The two entities frequently partner together to provide new events and programs, and the park provides technical assistance to the NHA.

At Senator J. Bennett Johnston's request, a feasibility study was conducted on two 200-year old plantations in the region to see if they should be designated as a national park. The study mentioned that the area around the plantations was a potential NHA, as it had unique cultural diversity and provided historical context for the park. At this time, there was only one heritage area in existence, and no process in place to designate others. In 1994, Senator Johnston spearheaded Congressional designation of the park, which also included the NHA.

At the time, no one in the region knew what an NHA was. The City of Natchitoches asked to be left out of the original boundary, despite the NHL district at its core, as there were fears about the heritage area's jurisdiction. The boundary identified in legislation was set to be 1 mile either side of Cane River Lake (a relic river channel that ran for about 30 miles), with the authorization to set a final boundary in the management planning process.

All planning for the NHA was accomplished after designation, including a management plan with significant public involvement. The original governing body was a commission appointed by the Secretary of the Interior but made up of local residents who filled defined seats. The NHA was prohibited from owning any real property. Per legislation, during planning the boundary was adjusted to be more practical, as 1 mile either side of an undulating body was impossible to clearly define.

The NHA started off slowly, but became successful in the early 2000s, when the national park, the City of Natchitoches, the Natchitoches Main Street, and the National Heritage Area had excellent synergy in leadership. In 2004, upon the 10-year Congressional reauthorization of funding for the NHA, the City of Natchitoches requested that they be included in the NHA so that city residents could apply for grants and the City could participate in other major initiatives, including a regional signage program. The grant program, by which individuals and organizations could apply to the NHA for funding that helped preserve and interpret the resources of the region, was both popular and highly effective. In addition, at the public's request, the act of Congress changed the boundary to align with more easily identifiable landmarks (an interstate to the west and the Red River to the east). This incorporated more territory, which allowed more people and organizations to apply for grants and was also easier for visitors to the region to understand.

At no time did private property owners feel their rights were trespassed upon, nor did the NHA get involved with or influence zoning in any way. The boundary was established through the public planning process and was adjusted 10 years later through Congressional action requested by local leaders. The National Park Service has been at the table from the beginning, but as a partner not a managing entity.

9. Growth in the tourism industry is not a significant contributor to the economy because jobs in the tourism industry are low paying.

Nonresident expenditures from tourism is a significant contributor to Montana's economy. A 2019 report from the Montana Institute for Tourism and Recreation Research (ITRR) states, "Money spent by those traveling to and through the state has an effect not only on the businesses where spending occurs, but it ripples throughout Montana's economy, both locally and regionally." Prior to the effects of the COVID-19 pandemic, visitors to Montana would spend over \$3 billion annually in the state. Nonresident spending for gas, food, hotels, groceries, retail sales, outfitter services, vehicle rentals and fees in the Central Montana Region (includes both Cascade and Chouteau Counties) was \$297.9 million. The ITRR report revealed that the \$297.9 million in local spending directly (in the Central MT Region) supported \$236.0 million of economic activity in the region, and supports an additional \$126.6 million of economic activity indirectly. The total contribution of nonresident spending to the regional economy was \$362.5 million.

In 2019, total nonresident spending in Cascade County totaled \$160.3 million. This \$160.3 million in local spending directly supported \$131.1 million of economic activity in the region, and supported an additional \$80.9 million of economic activity, indirectly. The total contribution of nonresident spending to the regional economy was \$212.0 million. The tourism industry in Cascade County supported 2,220 jobs (direct and indirect).

Pre-pandemic, each year one million nonresident visitors spent a night in Great Falls; and of those who overnight in the community 26% experience historic sites, 18% visit the CM Russell Museum, and 26% visit the Lewis and Clark National Historic Trail Interpretive Center. Tourism connected businesses account for 1,640 direct jobs. These jobs include general managers, sales directors, social media managers, sole proprietors of retail stores, outfitting operations, fueling stations, chefs, mixologist, desk clerks, cashiers, housekeeping and others.

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- Point Heritage Development Consulting, <https://www.pointhdc.com/>
- Fort Benton River Press, *Guest Opinion: Cascade & Chouteau counties are national treasures*, by Carroll Van West, Director of the Tennessee Civil War NHA, published September 23, 2020
- Testimony to the Subcommittee on National Parks, Forests and Public Lands Committee on Natural Resources, U.S. House of Representatives, National Heritage Area Act of 2019 (H.R. 1049) presented by Sara Capen, Chairwoman of the Alliance of National Heritage Areas and Executive Director of the Niagara Falls NHA, April 30, 2019, Appendix B includes an article titled: *Dispelling Myths and Falsehoods on the Issue of Private Property Rights and National Heritage Areas*
<https://naturalresources.house.gov/imo/media/doc/Capen,%20Sara%20-%20Written%20Testimony.pdf>

- *2019 Economic Contribution of Nonresident Travel Spending in Montana Travel Regions and Counties* by Kara Grau, published by the Institute for Tourism and Recreation Research, University of Montana. https://scholarworks.umt.edu/cgi/viewcontent.cgi?article=1412&context=itrr_pubs