



Cultural Resources Study Plan

Moyie River Hydroelectric Project
(FERC No. 1991)

February 17, 2025

Prepared by:



Prepared for:
City of Bonners Ferry
Bonners Ferry, Idaho

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List of Acronyms and Abbreviations

ACHP	Advisory Council on Historic Preservation
APE	area of potential effects
ARPA	Archaeological Resource Protection Act
CFR	Code of Federal Regulations
City	City of Bonners Ferry, Idaho
Commission	Federal Energy Regulatory Commission
FERC	Federal Energy Regulatory Commission
FLA	Final License Application
FOIA	Freedom of Information Act
FPA	Federal Power Act
HPMP	Historic Properties Management Plan
ICRIS	Idaho Cultural Resources Information System
IF	Isolated Find
NAGPRA	Native American Graves Protection and Repatriation Act
NHPA	National Historic Preservation Act
NPS	National Park Service
NOI	Notice of Intent
NRHP	National Register of Historic Places
PA	Programmatic Agreement
PAD	Pre-Application Document
Project	Moyie River Hydroelectric Project
SHPO	State Historic Preservation Officer
SIS	Stratified Inventory Strategy
SOI	Secretary of the Interior
Study	Cultural Resources Study
TLP	Traditional Licensing Process
U.S.C.	United States Code
USFS	U.S. Forest Service

1.0 Introduction and Background

1.1 General Description of the Project

The City of Bonners Ferry, Idaho (Bonners Ferry or City) is the licensee, owner, and operator of the Moyie River Hydroelectric Project (FERC No. 1991) (Project or Moyie River Project). The Project is located on the Moyie River in Boundary County, Idaho. The Project was licensed by the Federal Energy Regulatory Commission (FERC or Commission) on June 9, 1999 (with an effective date of June 1, 1999), and the license expires on May 31, 2029.

The Project is currently licensed by FERC under the authority granted by Congress through the Federal Power Act (FPA), 16 United States Code (U.S.C.) § 791(a), et seq., to license and oversee the construction and operation of non-federal hydroelectric projects on jurisdictional waters and/or federal lands. As described in the Pre-Application Document (PAD) and the associated Notice of Intent (NOI), filed with FERC on April 29, 2024, the City is pursuing a new license for the Project using FERC's Traditional Licensing Process (TLP), as defined in 18 Code of Federal Regulations (CFR) Part 5. On June 3, 2024, FERC approved the City's request to use the TLP. In accordance with FERC's regulations at 18 CFR § 16.9(b), the City must file an application for a new license for the Project on or before May 31, 2027.

At this time, the City is not proposing any modifications to the physical plant or dam, new facilities, or operational changes to the Project. While the City does not presently propose any new Project facilities or upgrades, the City will continually evaluate the potential for such improvements over the course of the relicensing. If the City intends to propose any new Project facilities or upgrades in the Final License Application (FLA) that would affect the scope of relicensing studies, the City will inform FERC and licensing stakeholders of this proposal at a time early enough in the pre-filing consultation process to ensure that the effects of any new facilities or upgrades are appropriately considered as part of the relicensing process.

1.2 Study Consultation

On October 7, 2024, the Idaho State Historic Preservation Officer (SHPO), through a letter submitted to the City by the Idaho Office of Energy and Mineral Resources, requested a cultural resources survey be conducted as part of the FERC relicensing efforts. The City consulted with the Idaho SHPO and Kootenai Tribe of Idaho in development of this Study Plan.

1.3 Study Goals and Objectives

The goal of the Cultural Resources Study (Study) is to determine if continued Project operations and maintenance and associated recreation will affect historic properties¹ or cultural resources not yet evaluated for the National Register of Historic Places (NRHP). This Study focuses on archaeological and historic built environment resources that are or are potential historic properties (i.e., cultural resources not yet evaluated). The objectives of the Study are to:

- Identify and document archaeological and historic-era properties within the Study Area and proposed area of potential effects (APE);

¹ "Historic property means any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the NRHP maintained by the Secretary of the Interior. This term includes artifacts, records, and remains that are related to and located within such properties. The term includes properties of traditional religious and cultural importance to an Indian Tribe or Native Hawaiian organization and that meet the National Register criteria" (36 CFR § 800.16(l)(1)).

- Evaluate the NRHP eligibility for properties identified within the Study Area and proposed APE, if possible; and
- Determine potential Project effects on NRHP-eligible or listed archaeological and historic-era properties within the Study Area and proposed APE.

The City assumes that the data collected and evaluated under this Study will be utilized in the development of a Historic Properties Management Plan (HPMP) as described below.

This Study does not include National Historic Preservation Act (NHPA) Section 106 informal consultation with the Idaho SHPO or interested Indian Tribes. Section 106 consultation will be conducted separately, outside of this Study. While the Study Report associated with this Study may identify potential avoidance, minimization or mitigation options, this Study does not include the development of potential requirements in the new license.

1.4 Project Nexus and Rationale

Section 106 of the 1966 NHPA, as amended, and its implementing regulations at 36 CFR § 800, require lead federal agencies to consider the effects of their undertakings on historic properties and to afford the Advisory Council on Historic Preservation (ACHP) a reasonable opportunity to comment on undertakings that will have an adverse effect on a historic property. In this case, the undertaking is FERC's issuance of a new license for the Project. On June 3, 2024, FERC designated the City as FERC's non-federal representative for carrying out consultation pursuant to Section 106 of the NHPA.

Because it is not possible to determine all of the effects of various Project activities that may occur over the course of a license, the City plans to develop a HPMP in consultation with the Section 106 consulting parties that will be used to manage potential effects on historic properties throughout the term of any new license issued by FERC. FERC typically completes the Section 106 process for relicensings by entering into a Programmatic Agreement (PA) with the SHPO², and the ACHP, if they choose to participate, that requires the licensee to develop and implement a HPMP.

² Other Section 106 consulting parties may be invited to sign the PA as concurring parties, not signatories.

2.0 Study Area

Under the NHPA Section 106 implementing regulations at 36 CFR § 800.16(d), the APE is defined as “the geographic area or areas within which an undertaking may directly or indirectly cause alterations in the character or use of historic properties, if any such properties exist.” Based on this regulatory definition, the APE for the Project relicensing has been initially identified by the City as including all lands within the FERC Project Boundary. This is the area identified by the City where Project operations or Project-related activities may cause changes in the character or use of historic properties, if any such properties exist. Pursuant to 36 CFR § 800.4(a)(1), the City will consult with the Idaho SHPO regarding the determination of the APE prior to study implementation.

For this Study, the Study Area will be synonymous with the APE. The Study Area/APE/FERC Project Boundary is shown in Figures 2.0-1 through 2.0-2 below. These figures also depict the primary Project facilities.

If the City proposes modifications to the FERC Project Boundary or Project-related effects are identified outside of the Study Area, the Study Area (and subsequently the APE) will be expanded as necessary to include areas potentially affected by the addition.

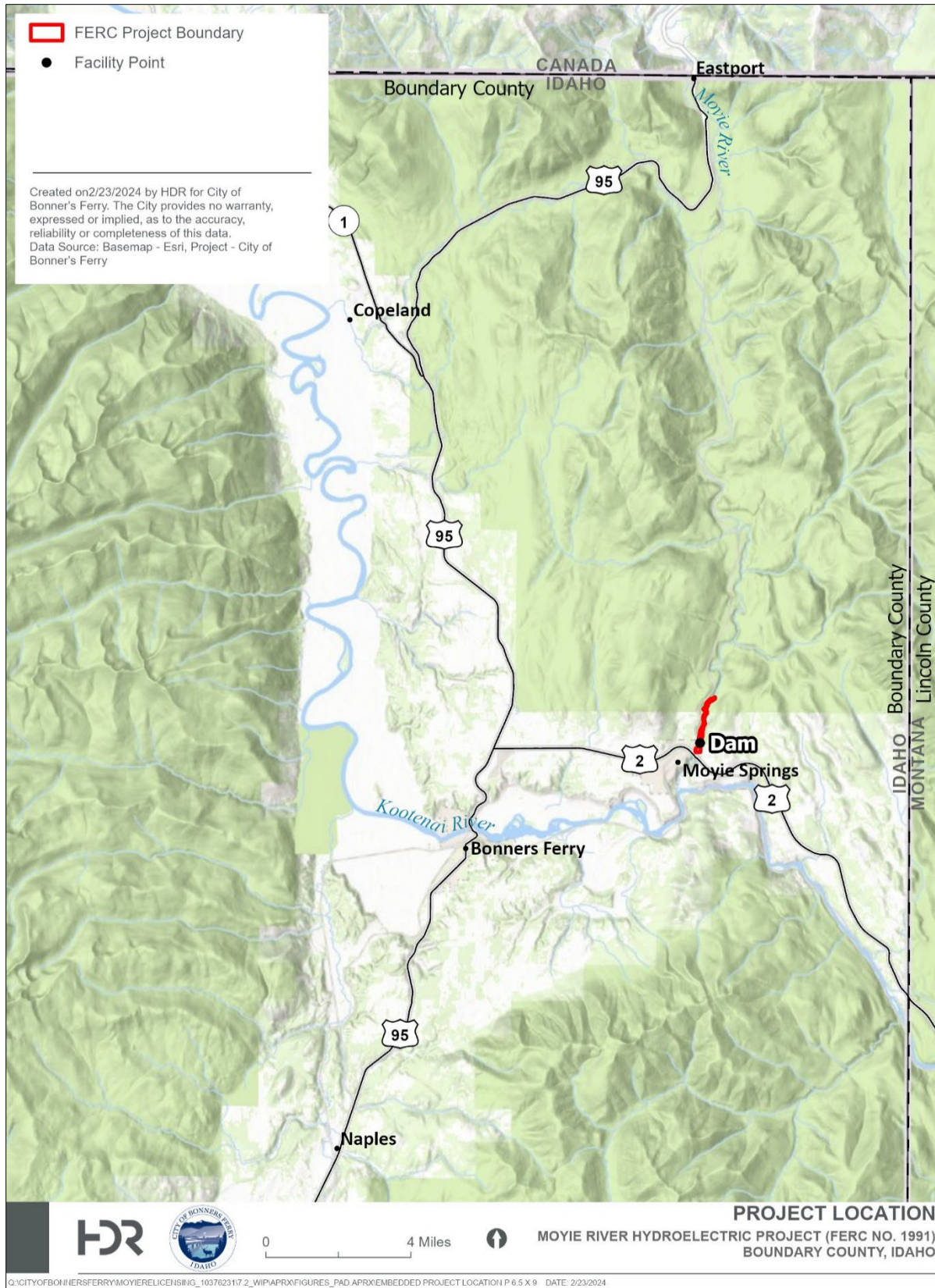


Figure 2.0-1. Project location.

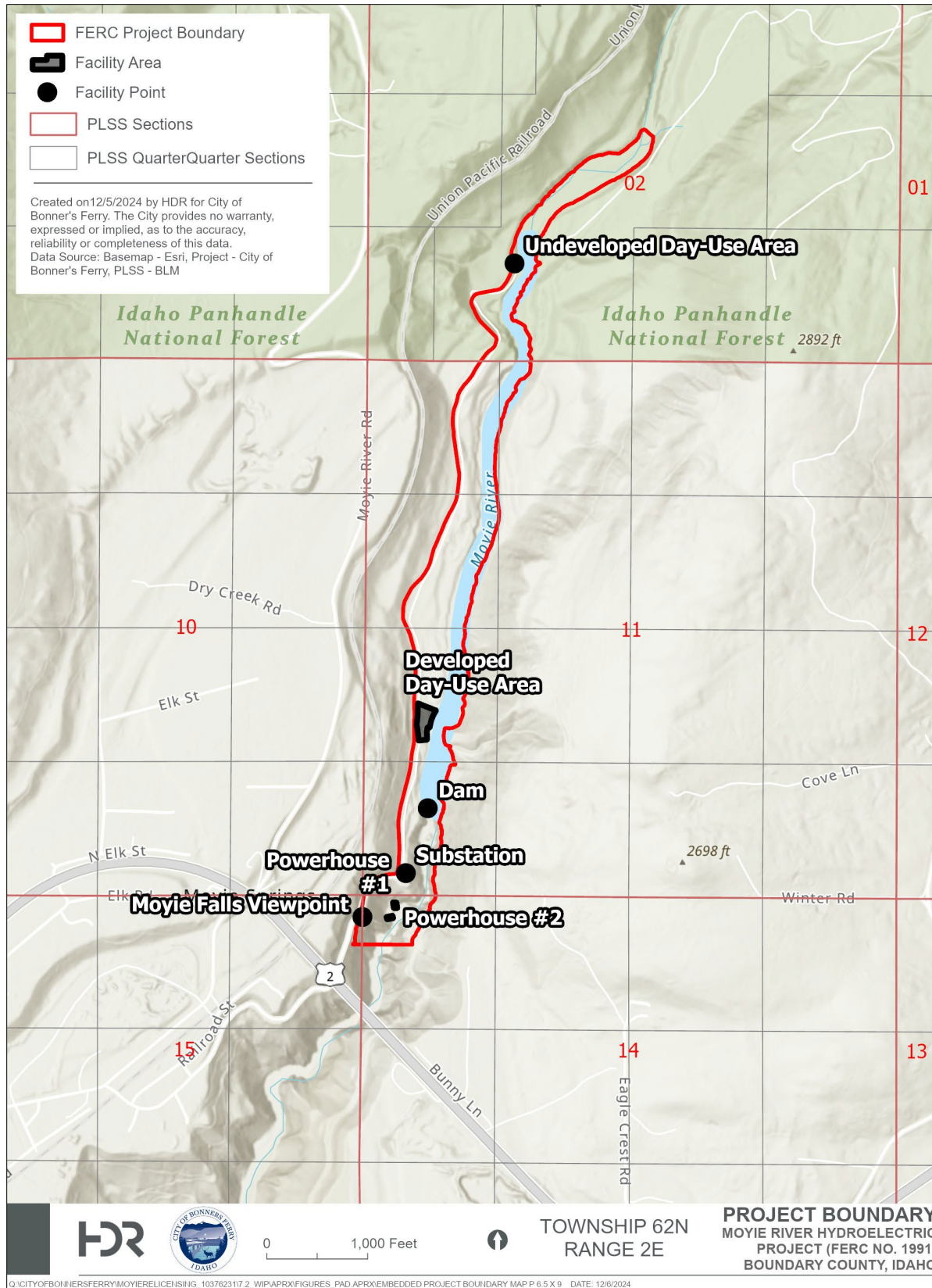


Figure 2.0-2. FERC Project Boundary.

3.0 Background and Existing Information

3.1 Previously Recorded Cultural Resources

As described in Section 5.10.3.2 of the PAD (City 2024), a cultural resources records search was conducted using the Idaho Cultural Resources Information System (ICRIS) in March 2024 to identify previously recorded cultural resources within one mile of the FERC Project Boundary. According to ICRIS, eight previous cultural resources investigations occurred within one mile of the FERC Project Boundary, of which only one overlaps within the FERC Project Boundary. To support the previous FERC relicensing efforts for the Project, a cultural resources inventory and report, prepared by Lorelea Hudson of Northwest Archaeological Associates, Inc, was conducted. The fieldwork for this inventory was completed in 1994 and included the survey of approximately 64 acres. As noted in the survey report, much of the area was too steep to access and the Project impoundment inundated a significant portion of the area and prevented pedestrian field survey.

Additionally, three other previous cultural resources investigations have been conducted within the FERC Project Boundary, as described below and further summarized in previous FERC relicensing studies (see Section 5.10.3.1 of the PAD [City 2024]). These three investigations do not appear in ICRIS within the FERC Project Boundary. One was conducted by the University of Idaho under contract to the U.S. Forest Service (USFS). This investigation included a survey of the Moyie River from the Canada/U.S. border to its confluence with the Kootenai River, as part of the National Wild and Scenic Rivers study in 1975. Although this effort identified archeological sites along the river, none were identified within the FERC Project Boundary. Another investigation that included portions of the FERC Project Boundary was conducted by the Idaho Panhandle National Forest in 1988. This investigation identified three sites within the FERC Project Boundary.

The third previously conducted cultural resources investigation that occurred within the FERC Project Boundary, based on previous relicensing studies, consisted of both field and documentary collection of information related to two sites. This effort resulted in merging the two sites into one. These efforts and results were documented and disseminated to interested parties in the Cultural Resources Management Plan prepared for the Project as part of previous relicensing efforts (Southworth et al. 2001).

A total of eight archaeological sites and 13 built environment resources have been previously recorded within one mile of the FERC Project Boundary, as identified by ICRIS. These 21 resources are variously associated with historic mining, transportation, habitation, and the development of hydroelectric power in Northern Idaho. Based on ICRIS, of the 21 resources, seven are eligible for inclusion in the NRHP, 13 are not eligible, and one has not yet been evaluated. Six of the 21 resources fall within the FERC Project Boundary. These six resources include five historic-era archaeological sites and one historic built environment resource. Four of these six resources are eligible for inclusion in the NRHP, and two are not eligible. All 21 previously recorded cultural resources are listed in Table 5.10-1 of the PAD (City 2024).

4.0 Methodology and Reporting

The Study will be performed in four steps: 1) archival research; 2) field survey and identification of resources; 3) identification and assessment of potential Project effects on identified cultural resources; and 4) reporting. Each of these steps is described below.

4.1 Archival Research

As described in Section 3 above, a cultural resources records search was conducted using the ICRIS in March 2024 to identify previously recorded cultural resources within one mile of the FERC Project Boundary. As necessary, additional archival research will be conducted to obtain any additional information specific to cultural resources in the Study Area. Potential places to be contacted include:

- Idaho State Historic Society;
- Idaho State Archives and Libraries;
- USFS Records;
- Boundary County Historical Society and Museum; and
- Digital Library of Idaho.

4.2 Field Survey and Identification of Resources

4.2.1 Archaeological Field Survey

The City will conduct a pedestrian field survey to verify locations of previously recorded cultural resources and to identify previously unknown cultural resources, if present, in the Study Area. The archaeological survey will be a Class III Inventory and will follow the approved archaeological survey and inventory standards maintained by the Idaho SHPO. The field survey will be supervised by qualified, professional archaeologists (i.e., individuals who meet the Secretary of the Interior's (SOI) Historic Preservation Professional Qualifications Standards for Archaeology) and will follow the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation (National Park Service [NPS] 1983). As a portion of the Study Area consists of USFS managed lands, the field survey of these lands will be conducted under an Archaeological Resource Protection Act (ARPA) permit acquired through the Panhandle National Forest. Archaeological field survey of the USFS managed lands will also comply with the stipulations of the *Programmatic Agreement Among The United States Department of Agriculture, Forest Service, Northern Region, The Advisory Council on Historic Preservation and The Idaho State Historic Preservation Officer Regarding Cultural Resource Management on Region 1 National Forests in the State of Idaho* (Region 1 Idaho PA) and the Forest Stratified Inventory Strategy (SIS).

The survey will examine all accessible lands within the Study Area. Locations within the Study Area that cannot be accessed in a safe manner (e.g., locations containing dense vegetation, unsafe slopes, or inundated areas) will not be surveyed; these areas will be identified in the Study Report and an explanation for survey exclusion will be provided. Field methods will include crew members walking parallel transects spaced no more than 30 meters apart. Topographical features considered to be sensitive for cultural resources (e.g., flat stream terraces) will be thoroughly inspected. Lands typically inundated by the Project reservoir that become accessible during the survey season as a result of normal operations or other maintenance activities will be examined. However, it should be noted that unlike other reservoirs that are regularly drawn down during

certain times of the year, the Project is operated as a run-of-river hydroelectric project, meaning that there is little water storage in the Project reservoir and the reservoir is dependent on regular river flows and is not regularly drawn down. As such, it is not expected that extensively exposed shorelines around the Project reservoir will be visible or surveyable during the Study. The City will make a reasonable effort to access all areas that are safe to survey during the Study, and will view inaccessible locations as possible from boat or other advantageous locations to provide as much information as possible on locations that cannot be surveyed on foot. Additionally, each site identified during the survey will be assessed for Project-related effects including, but not limited to, water fluctuation, wave action, and vegetation management activities. Locations of previously recorded cultural resources will be verified, and the sites re-recorded to current standards for inclusion in the ICRIS.

Field crews will use digital tablets (iPad or similar) equipped with Esri's Field Maps application and connected to a global navigation satellite system receiver. The digital tablets will be pre-loaded into the Field Maps application along with the FERC Project Boundary, locations of previously documented sites received from record search data, and digitized locations of potential historic features identified during pre-field research. Newly and previously identified resources will be recorded according to Idaho SHPO standards in the ICRIS.

Precontact and historic-era isolated resources will be documented as isolated finds (IF). Consistent with the Idaho SHPO definition (Idaho SHPO 2024), an IF will be defined as any resource consisting of fewer than 10 artifacts within a 10-meter-diameter area with no associated features. IFs will be evaluated for NRHP eligibility following SHPO guidelines (Idaho SHPO 2024). Site and IF information will be recorded and uploaded to the ICRIS form. The condition of each resource documented will be recorded in the field.

4.2.2 Built Environment Survey

A field inspection and documentation of historic built-environment resources 45 years or older that are within or partially within the FERC Project Boundary will be conducted. The ICRIS records search conducted in March 2024 identified 13 architectural/linear resources within a one-mile radius of the FERC Project Boundary. For the purposes of this survey, only those built-environment resources fully within or partially within the FERC Project Boundary, or that may not be within the FERC Project Boundary but are on parcels that intersect with the FERC Project Boundary will be surveyed and evaluated. Each resource will be recorded in ICRIS.

An architectural historian who meets the SOI's Professional Qualifications Standards for architectural history will supervise all fieldwork and reporting. Architectural historians will review available documents to provide a basis for recommendations on eligibility, significance, and integrity. The survey will consist of a field visit and archival research following methods outlined in Idaho SHPO guidance (Idaho SHPO 2024). Historic built-environment resources will be recorded or re-recorded to meet current SHPO standards. This will include digital color photography and sketch maps of individual features that show the relationship between buildings and structures, including any historic architectural or engineering plans, subject to availability. The historic built environment resources identified during the Study will be assessed together, as a system and a potential district³, as well as on an individual basis.

³ "A district possesses a significant concentration, linkage, or continuity of sites, buildings, structures, or objects united historically or aesthetically by plan or physical development" (NPS 1997:5).

4.3 Identify and Assess Potential Effects on Cultural Resources

The City will document any Project-related effects identified at cultural resources in the Study Area. This information will be used to inform the need for any NRHP evaluations that may occur under the NHPA Section 106 consultation. Additionally, the City will also describe other potential threats to the cultural properties within the Study Area, including natural deterioration such as erosion or deflation; on-going use such as recreational use; or the potential for vandalism. The Study Report will describe potential effects from Project-related activities and any potential avoidance, minimization or mitigation options.

As possible based on the level of documentation completed for the Study, the City will apply the NRHP criteria for evaluation pursuant to 36 CFR § 60.4 to evaluate the eligibility of identified properties for inclusion in the NRHP and consider and review previous NRHP evaluations conducted by others to incorporate existing evaluation data as appropriate. The integrity of properties that meet the significance requirements under one or more of the NRHP criteria of evaluation will be assessed pursuant to 36 CFR § 60.4 to confirm they still retain sufficient integrity in order to convey their significance⁴. It is possible that some identified properties may not have enough available information to complete NRHP eligibility evaluations (e.g., precontact sites with untested subsurface components); these properties will be assumed and treated as eligible for inclusion in the NRHP.

In accordance with the criteria for evaluation (36 CFR § 60.4), properties are eligible if they are significant in American history, architecture, archaeology, engineering, or culture. The quality of significance is present in historic properties that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and:

- Criterion A: Are associated with events that have made a significant contribution to the broad patterns of our history; or
- Criterion B: Are associated with the lives of persons significant in our history; or
- Criterion C: Embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant or distinguishable entity whose components may lack individual distinction; or
- Criterion D: Have yielded or may be likely to yield information important in prehistory or history.

4.4 Reporting

The City will prepare a report at the conclusion of the Study consistent with SHPO guidance that includes the following sections: 1) Project Description, 2) Study Goals and Objectives, 3) Environmental Setting and Cultural and Historical Context, 4) Pre-Field Research, 5) Consultation Summary, 6) Methods and Results, 7) Management Recommendations and Conclusions⁵, and 8) Description of Variances from this Study Plan. The report will also include:

- Maps that clearly depict the following on U.S. Geological Survey 1:24,000 topographic maps:
 - The FERC Project Boundary;

⁴ Integrity of historic properties is described in National Register Bulletin 15, *How to Apply the National Register Criteria for Evaluation* (NPS 1997).

⁵ Recommendations could include the development a PA and Historic Properties Treatment Plan or HPMP if there are eligible resources within the APE.

- Resource locations; and
 - Survey coverage.
- Consultation correspondence related to the Study.
- Descriptions of the isolated finds.
- Resumes for key Study personnel.

The results of the Study may include culturally sensitive information that is exempt from public release⁶. The City will protect the culturally sensitive information from public view by designating it as privileged and only distributing it to those consulting parties allowed access to privileged information (i.e., Tribes, SHPO, FERC, and USFS cultural resources representatives). It is expected that the portions of the Study Report that include privileged information will only be shared as described here and will be filed in FERC's privileged files. The Study Report will be distributed to interested Tribes, USFS, and the SHPO for review and comment as part of the NHPA Section 106 consultation process that will be conducted by the City outside of this Study.

⁶ Federal laws exempt certain types of cultural resources information from public disclosure (e.g., 54 U.S.C. Section 307103(a) of the NHPA, Section 9(a) of the ARPA, exclusions permitted by the Freedom of Information Act (FOIA), and the Native American Graves Protection and Repatriation Act (NAGPRA)).

5.0 Schedule and Consultation

5.1 Study Schedule

Archival research will begin in 2025, with field surveys to be conducted during the 2025 field season. A progress report will be provided on or before January 31, 2026, discussing non-confidential initial findings of the Study to date. A confidential draft report will be provided to appropriate consulting parties, as described above, once complete, no later than January 1, 2027.

5.2 Consultation

The City will consult with Idaho SHPO, the USFS, and interested Tribes prior to execution of the Study. Consultation summaries will be provided in the Study Report.

6.0 References

- City of Bonners Ferry, Idaho (City). 2024. Pre-Application Document for the Moyie River Hydroelectric Project, FERC Project No. 1991. April 2024.
- Idaho State Historic Preservation Office (SHPO). 2024. Idaho SHPO Guidance. Idaho State Historic Preservation Office, Boise. [Online] URL: <https://history.idaho.gov/shpo/idaho-shpo-guidance/>. Accessed October 16, 2024.
- Southworth, Don, Michael K. Polk, and Sanieel Sayers. 2001. Cultural Resource Management Plan, Moyie River Hydroelectric Project (FERC No. 1991). Prepared by Sagebrush Consultants, L.L.C. Prepared for City of Bonners Ferry, Idaho.
- United States Department of Interior, National Park Service (NPS). 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines in the Federal Register, September 29, 1983 (48FR44716). Department of the Interior, Washington, D.C.
- _____. 1997. How to Apply the National Register Criteria for Evaluation. Bulletin 15. U.S. Department of the Interior, National Park Service, Washington, D.C. [Online] URL: https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf. Accessed October 17, 2024.

7.0 Consultation

Table 7.1-1. City of Bonners Ferry Response to Comments Received on the Cultural Resources Study.

Comment Date	Entity	Comment	City Response
11/13/24	Idaho SHPO	The Idaho SHPO Office has not yet been consulted on for the proposed APE for Study. Our office recommends that APE consultation be carried out prior to implementation of the proposed Study.	Changes made in Section 2.0 to clarify that the City intends to consult with SHPO regarding determination of the APE prior to implementation of the Study.
11/13/24	Idaho SHPO	Please include an historic architectural or engineering plans, or historic photographs if they are available as a district.	Changes made to Section 4.2.2 to clarify that any historic architectural or engineering plans, subject to availability, will be included.
11/13/24	Idaho SHPO	[Add] as a district.	Changes made to Section 4.2.2 to specify that historic built environment resources identified during the Study will be assessed together as a potential district.
11/13/24	Idaho SHPO	Any resources or cultural materials, whether previously identified or newly identified within the area of potential effect must be evaluated for their historic significance in order to determine project effect. This is completed by applying the criteria for the National Register of Historic Places (36 CFR 63). Idaho SHPO no longer accepts "Unevaluated".	Changes made throughout the document to note that resources not yet evaluated will be assumed and treated as eligible for inclusion in the NRHP. The term "unevaluated" has been removed.
11/13/24	Idaho SHPO	This should include the recommendation of PA with the development of HPTP or HPMPs if there are eligible resources within the APE.	Changes made to Section 4.4 to incorporate these recommendations.
1/15/25	KTOI	Regarding Section 4.2.2 (Built Environment Survey), where it says the survey will look at resources fully within or on parcels that intersect the FERC Project Boundary, that means a resource partially on the site would be included, correct?	Changes made to Section 4.2.2 to clarify that resources within or partially within the FERC Project Boundary will be surveyed and evaluated.
1/23/25	Idaho SHPO	Based on the information provided to our office, we find the Cultural Resources Study Plan will suffice to conduct the necessary research work for the proposed relicensing effort for the Moyie River Hydroelectric Project (FERC No.1991).	Thank you for your review.