



## Department of Energy

Bonneville Power Administration  
P.O. Box 3621  
Portland, Oregon 97208-3621

ENVIRONMENT, FISH AND WILDLIFE

April 17, 2025

In reply refer to: EH-4

Tricia Canaday, Deputy SHPO  
Idaho State Historical Society  
State Historic Preservation Office

RE: Pack River Delta Restoration Project 3.0  
F&W Project No.: 1991-061-03  
BPA CR Project No.: ID 2024 020  
ICRIS Project No.: 2024-1170

Dear Tricia Canaday:

Enclosed for your review and comment is a report prepared for the Bonneville Power Administration (BPA) by the Kalispel Tribe of Indians. The report covers the Pack River Delta Restoration Project 3.0 in Bonner County, Idaho, proposed for funding by BPA and implementation by Ducks Unlimited and occurring on federal land managed by the U.S. Army Corps of Engineers (USACE). Pursuant to its responsibilities under Section 106 of the National Historic Preservation Act and 36 CFR Part 800, BPA initiated consultation with your office on August 26, 2024, related to proposed geotechnical investigations and received concurrence with the Area of Potential Effects (APE) from the Idaho State Historic Preservation Office (SHPO) on September 30, 2024. BPA amended the APE to include habitat restoration components in addition to the geotechnical monitoring and sent a revised letter to consulting parties with the amended APE and project description on October 9, 2024. SHPO concurred with the APE on October 15, 2024. No other responses were received.

Pursuant to 36 CFR 800.2(c) the consulting parties for this project includes: Coeur d'Alene Tribe, Confederated Salish and Kootenai Tribes, Kalispel Tribe, Kootenai Tribe of Idaho, and Idaho SHPO. By agreement with the USACE, BPA is the lead federal agency for Section 106 compliance (agreement July 16, 2024).

Kalispel Tribal archaeologists conducted background research using the Idaho Cultural Resources Information System (ICRIS), monitoring of geotechnical trench investigations, and an intensive field survey including shovel testing of the APE in November and December 2024.

## **Results of Investigations**

Background research indicated there are five previously recorded precontact archaeological sites within the APE consisting primarily of fire-cracked rock (FCR) features and scatters: 10BR120/676, 10BR665, 10BR667, 10BR673, and 10BR674. As a result of the 2024 investigations, these sites were found to have changed as compared to the original site forms (1974 and 1988) in terms of site boundaries, FCR density, and feature concentrations. The Kalispel Tribe updated site records in ICRIS for these five sites.

Five additional archaeological sites were newly recorded: 10BR2674, 10BR2675, 10BR2676, 10BR2677, and 10BR2678. These sites are similarly characterized primarily by surface FCR scatters and concentrations.

As part of the project, geotechnical trench excavations (n=16) monitored by an archaeologist and shovel testing (n=52) occurred within four sites: 10BR667, 10BR2675, 10BR2676, and 10BR2678.

When encountered, charcoal samples were collected and submitted for radiocarbon dating to assess age and information potential. Samples were collected from three sites: 10BR2675, 10BR2676, and 10BR2678.

## **National Register Recommendations**

The Kalispel Tribe provided National Register of Historic Places (NRHP) recommendations for four archaeological sites within the APE that could be affected by ground-disturbing project activities: 10BR667, 10BR2675, 10BR2676, and 10BR2678. As described below, they only recommend one of these sites (10BR2675) as eligible for listing on the NRHP based primarily on its information potential as substantiated by subsurface testing; the project was subsequently redesigned to avoid this site. The other three sites that would be impacted by the project are recommended as not eligible due to lack of important associations and/or integrity and would be affected by the project through removal and/or burial as part of the borrow and fill areas associated with the creation of islands.

The other six sites within the APE (10BR120/676; 10BR665, 10BR673, 10BR674, 10BR2674, 10BR2677) are outside the impact area and no ground disturbance would occur. Because additional testing would be needed to fully assess them, National Register evaluations were not provided. They remain unevaluated and treated as eligible for the purposes of this project.

The Kalispel Tribe evaluated significance based on a site's ability to meet one (or more) of the following criteria, and the integrity of the resource and ability to convey historical significance:

- *Criterion A.* A property is associated with events that have made a significant contribution to the broad patterns of our history.
- *Criterion B.* A property is associated with the lives of persons significant in our past.

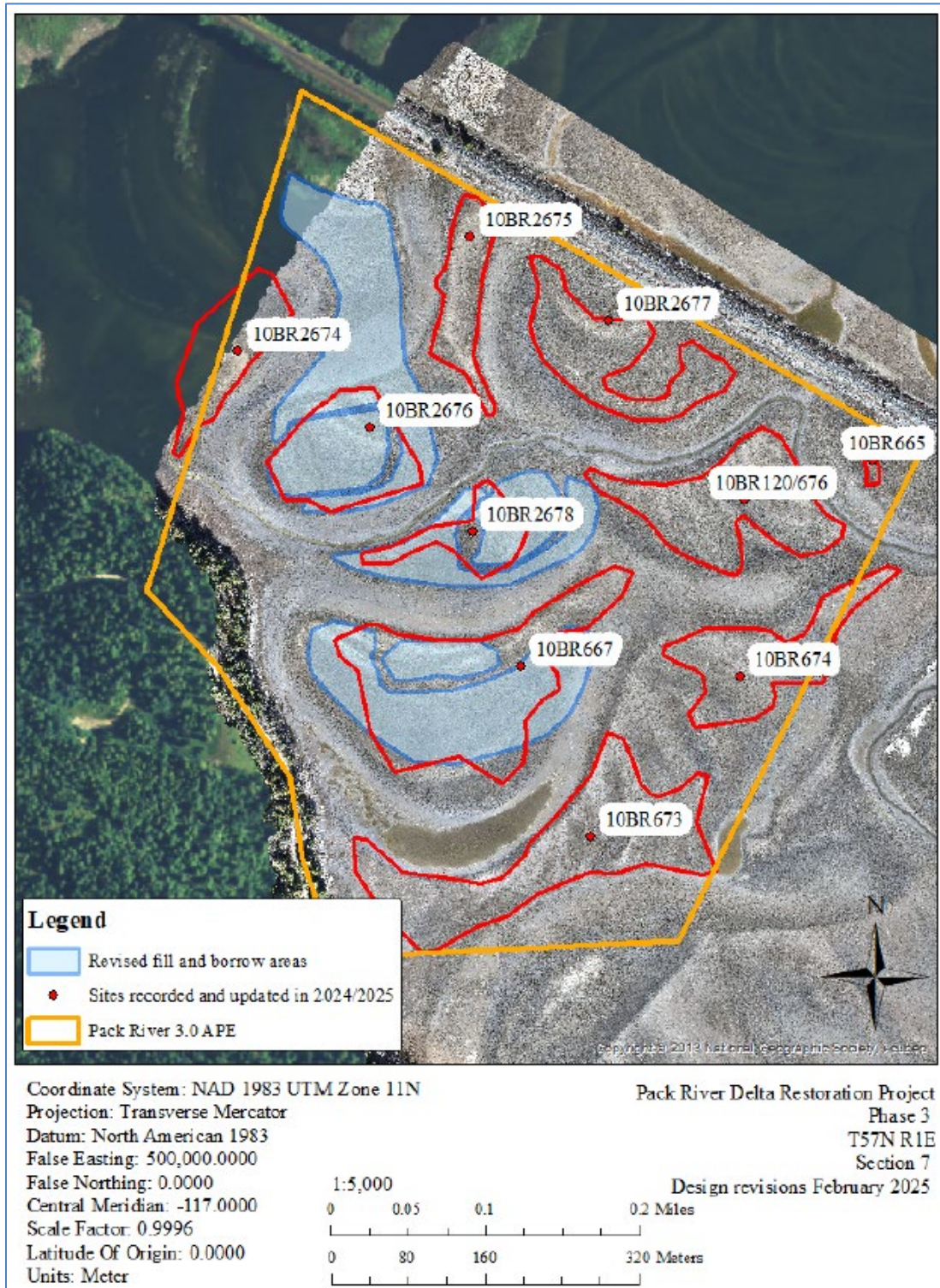
- *Criterion C.* A property embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components may lack individual distinction.
- *Criterion D.* A property yields, or may be likely to yield, information important in prehistory or history.

Table 1 summarizes the sites within the APE and the Tribe's recommended eligibility status. Figure 1 illustrates the site locations in relation to the proposed borrow and fill areas (modified to avoid eligible and unevaluated sites). Eligibility recommendations for the four sites that were evaluated for the NRHP as part of this project are described in detail below.

**Table 1.** Summary of NRHP recommendations and effect.

Site	2024 NRHP Recommendation	2024 Testing	Impact Area?	Mitigation	Project Effect
<b>Previously Recorded Resources</b>					
10BR120/676	Unevaluated (treat as Eligible)		No	Avoid	No effect
10BR665	Unevaluated (treat as Eligible)		No	Avoid	No effect
<b>10BR667</b>	<i>Not eligible based on testing</i>	<b>22 STs 4 GTs</b>	<b>Yes</b>	<b>None</b>	<b>Removed/buried (fill and borrow area)</b>
10BR673	Unevaluated (treat as Eligible)		No	Avoid	No effect
10BR674	Unevaluated (treat as Eligible)		No	Avoid	No effect
<b>Newly Recorded Resources</b>					
10BR2674	Unevaluated (treat as Eligible)		No	Avoid	No effect
10BR2675	<i>Eligible based on testing</i>	11 STs 2 C-14 samples	No	Avoid (through project redesign)	No effect
<b>10BR2676</b>	<i>Not eligible based on testing</i>	<b>6 STs 7 GTs 1 C-14 sample</b>	<b>Yes</b>	<b>None</b>	<b>Removed/buried (fill and borrow area)</b>
10BR2677	Unevaluated (treat as Eligible)		No	Avoid	No effect
<b>10BR2678</b>	<i>Not eligible based on testing</i>	<b>13 STs 5 GTs 2 C-14 samples</b>	<b>Yes</b>	<b>None</b>	<b>Removed/buried (fill and borrow area)</b>

**Bold/highlighted** = project impacts would occur; *Italics* = NRHP evaluation based on 2024 investigations  
ST = shovel test; GT = geotechnical trench



**Figure 1.** Previous and newly recorded sites in relation to proposed revised fill and borrow areas

10BR667

The site consists of a thin/low density scatter of FCR (less than 20 pieces/m<sup>2</sup>) over an area measuring approximately 160 m N/S by 315 m E/W. Three distinct high-density concentrations (>40/m<sup>2</sup>) were observed and the site boundary from 1988 was expanded. For this investigation, 4 geotechnical trenches and 22 shovel tests were excavated, all of which were negative for cultural material. No intact deposits were observed, and age is undetermined. Examination of the historic record through aerial photography from the 1930s as well as photos from the late 1800s indicate that this area was an agricultural landscape. Based on historic research and subsurface testing, the Kalispel Tribe recommends site 10BR667 as **not eligible** for listing on the NRHP due to lack of important associations under any of the criteria:

- The site is not eligible under Criterion A as the Tribe does not consider this FCR deposit to be associated with an important event, nor are there substantial historic references to a significant event in this area.
- The site is not eligible under Criterion B as demonstrated through a review of historical material and a lack of information tied to a specific person significant in the past.
- The site is not eligible under Criterion C as the scattered FCR materials do not embody distinctive characteristics of a type or period or method of construction.
- The site is not eligible under Criterion D as it is not likely to yield information important in prehistory or history; intact cultural deposits were not identified through subsurface testing to support additional information discovery.

In addition to lack of important associations, integrity has been affected. The site is annually impacted by lake operations resulting in deflation, and no intact strata were identified. The deflation of the site has altered aspects of integrity such as setting, feeling, and location.

10BR2675

The site consists of FCR surface features (n=7) and a diffuse scatter of FCR over an area measuring approximately 230 m N/S by 50 m E/W. Eleven shovel tests were excavated, which demonstrated that intact prehistoric components exist. During subsurface excavations, charcoal was sampled from two features (10 to 30 cm depth) which yielded conventional ages 3650 +/- 30 BP and 3440 +/-30 BP (calibrated ages 2140-1930 BC and 1830-1670 BC). Based on historic research and subsurface testing, the Kalispel Tribe recommends site 10BR2675 as **eligible** for listing on the NRHP due to important associations at a minimum under Criterion D, and possibly also under Criterion A:

- The site may be considered eligible under Criterion A as it is associated with the theme of ancestral use of Lake Pend Oreille, Pack River, shoreline environments, and the value of the Pack River flats or bay. Ethnographic and historic references indicate this area was significant.
- The site is not eligible under Criterion B as demonstrated through a review of historical materials and lack of information tied to a specific person significant in the past.
- The site is not eligible under Criterion C as the current understanding of the site contents (FCR) and antiquity does not embody distinctive character.

- The site is recommended eligible under Criterion D. This site is located on a mid-Holocene landform and contributes information related to the broader context of similarly dated landforms within the watershed. Its data also contributes to an on-going effort to collect C-14 data for the Pend Oreille Valley. The site has intact features with the potential to yield important information related to mid-Holocene adaptations.

With regard to integrity, site 10BR2675 has intact stratified deposits of FCR and datable organics. Clustering of the FCR within the site also suggests some horizontal spatial integrity. Unlike the other sites investigated in 2024, 10BR2675 maintains integrity. The site has not been affected by the degree of deflation as the others have, such that it is able to convey its historical significance.

#### 10BR2676

The site consists of a low-density diffuse scatter of FCR across an area measuring approximately 125 m N/S by 160 m E/W. A total of 7 geotechnical trenches and 6 shovel tests were excavated. One C-14 date was obtained from a possible feature encountered in a trench at 10 cm depth and yielded a relatively recent historic date (140 +/- 30 BP; calibrated age of 1790 to 1950 AD). Examination of the historic record through aerial photography from the 1930s as well as photos from the late 1800s indicate that this area was an agricultural landscape. Based on historic research and subsurface testing, the Kalispel Tribe recommends this site as **not eligible** for listing on the NRHP due to lack of important associations under any of the criteria:

- The site is not eligible under Criterion A as the Tribe does not consider this FCR deposit to be associated with an important event, nor are there substantial historic references to a significant event in this area.
- The site is not eligible under Criterion B as demonstrated through a review of historical material and a lack of information tied to a specific person significant in the past.
- The site is not eligible under Criterion C as the scattered FCR materials do not embody distinctive characteristics of a type or period or method of construction.
- The site is not eligible under Criterion D as it is not likely to yield information important in prehistory or history; the lack of material in the tested area indicates there is not enough data potential to pursue additional studies.

In addition to lack of important associations, integrity has been affected. The site is annually impacted by lake operations resulting in deflation, and no intact strata were identified. The deflation of the site has altered aspects of integrity such as setting, feeling, and location.

#### 10BR2678

The site consists of a low-density (<20/m<sup>2</sup>) diffuse scatter of FCR across an area measuring approximately 100 m N/S by 175 m E/W. A total of 5 geotechnical trenches and 13 shovel tests were excavated. Two C-14 samples were collected and yielded relatively recent historic dates (100 +/- 30 BP and 110 +/- 30 BP, calibrated ages ~ 1800-1930 AD and 1800-1940 AD). The samples from this location were surrounded by wood fragments and nails. Examination of the historic record through aerial photography from the 1930s as well as photos from the late 1800s indicate that this area was an agricultural landscape. Based on historic research and subsurface testing, the

Kalispel Tribe archaeologists recommend this site be considered **not eligible** for listing on the NRHP due to lack of important associations under any of the criteria:

- The site is not eligible under Criterion A as the Tribe does not consider this FCR deposit to be associated with an important event, nor are there substantial historic references to a significant event in this area.
- The site is not eligible under Criterion B as demonstrated through a review of historical material and a lack of information tied to a specific person significant in the past.
- The site is not eligible under Criterion C as the scattered FCR materials do not embody distinctive characteristics of a type or period or method of construction.
- The site is not eligible under Criterion D as it is not likely to yield information important in prehistory or history; the lack of material in the tested area indicates there is not enough data potential to pursue additional studies.

In addition to lack of important associations, integrity has been affected. The site is annually impacted by lake operations resulting in deflation, and no intact strata were identified. The deflation of the site has altered aspects of integrity such as setting, feeling, and location.

#### Archaeological District 10BR1192

The project falls within the East Pend Oreille Lake Rock Art District (10BR1192), which is characterized by rock art panels. The 10 sites within the project that overlap the District are not rock art panels and are set apart from this District by their defining attributes of FCR scatters and concentrations; these sites are therefore considered non-contributing to the District.

#### **Summary**

Three archaeological sites (10BR667, 10BR2676, and 10BR2678) within the APE would be impacted by the proposed fill and borrow actions. Each of these has been tested and is recommended as not eligible for listing on the NRHP. One additional site (10BR2675) was originally within an impact area but after it was recommended as eligible based on testing, the project was redesigned to avoid this site. The remaining six sites (10BR120/676, 10BR665, 10BR673, 10BR674, 10BR2674, and 10BR2677) remain unevaluated and treated as eligible for the purposes of this project and would be avoided.

Therefore, as per §36 CFR 800.4(d)(1), BPA has determined that the implementation of the proposed undertaking will result in **no historic properties affected**.

Given sensitivity of the landform and in order to ensure avoidance of eligible and unevaluated sites in the near vicinity of the project impact area, BPA would require that the project sponsor have an archaeological monitor present during ground disturbing construction activities.

In the event that cultural material is inadvertently encountered during the implementation of this project, BPA will require that work be halted in the vicinity of the finds until they can be inspected and assessed by BPA and in consultation with the appropriate consulting parties.



BPA would appreciate your concurrence on this determination. This determination has also been forwarded to the parties listed above for review. If you have any questions, please do not hesitate to contact the project archaeologist Sarah McDaniel at [sfmcDaniel@bpa.gov](mailto:sfmcDaniel@bpa.gov) or 503-230-3696.

Sincerely,

/s/ Jenna E. Peterson

Jenna E. Peterson

Supervisory Archaeologist

Enclosure:

Report: *Cultural Resources Monitoring and Inventory for the Pack River Delta Restoration Project 3.0, Bonner County, Idaho*

ecc: (w/o enclosure)

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