



United States Department of the Interior

BUREAU OF RECLAMATION
Montana Area Office
P.O. Box 30137
Billings, MT 59107-0137



IN REPLY REFER TO:

MT-227
2.1.1.04

May 11, 2021

VIA ELECTRONIC MAIL ONLY

John T. Eddins
Advisory Council Historic on Preservation
401 F Street NW, Suite 308
Washington, DC 20001
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Subject: Bureau of Reclamation Request for the Advisory Council on Historic Preservation
Review and Opinion on Bureau of Reclamation Findings on Two Proposed
Undertakings located in Goose Bay Campground near Canyon Ferry Reservoir in
Broadwater County, Montana.

Dear Dr. Eddins:

The Montana Area Office of the Bureau of Reclamation (Reclamation) requests Advisory Council on Historic Preservation (ACHP) review according to 36 CFR 800.4(d)(1)(ii) and pursuant to paragraphs (d)(1)(iv)(A) through (d)(1)(iv)(C) for its review and opinion on Reclamation's determination of no historic properties affected for the proposed undertakings Goose Bay Marina Berm and Beach, MTAO Project No. CF-21-006 and the Goose Bay Marina Security Fencing, MTAO Project No. CF-21-007 located in Goose Bay Campground near Canyon Ferry Reservoir in Broadwater County, Montana. Please see the enclosed findings and supporting documentation. Reclamation and the Montana State Historic Preservation Office (SHPO) are in a dispute. Reclamation made a determination in the Area of Potential Effects (APE) for both undertakings, supplied the SHPO with the basis for that determination and still has not received a clear decision whether the SHPO concurs or does not concur with Reclamation's determination even though the SHPO has the information needed for these two small APEs located in a recently built campground.

We have a situation where a concessionaire, under contract in one of Reclamation's new campgrounds completed in 2016, has approached Reclamation in requesting to make two small improvements. Project CF-21-006 is to construct a protective berm (for ant and mosquito control) and new beach. Project CF-21-007 is to construct fencing.

Reclamation did submit a letter and APE map on CF-21-007 with no cultural resources indicated; however, because of the scale of the map and slight error inherent with large scale, on closer examination the coordinates of the center of former site 24BW0085 were found to just cross the APE line by approximately 2.4 meters. 24BW0085 was a 20-meter diameter modern dump of largely deteriorated boat dock, including limited amounts of household refuse, tires, and marine/car batteries less than 20 years old in the spring of 2008. The 2008 Brumley (contractor) report says this does not meet the criteria of a cultural resource. The SHPO has this report. Reclamation determined 24BW0085 not eligible in consultation with the SHPO in 2013, prior to the construction of the new Goose Bay campground, as it had been assigned a site number.

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* PARTIAL

This no longer exists because of the construction of the new campground. Please see the portion of the Brumley report enclosed for reference.

Also, please see Reclamation's enclosed March 17, 2021 letter regarding the status of site 24BW0005 that Reclamation consulted on in 2020 with the SHPO. This consultation was on a new 2019 cultural resource inventory that Reclamation contracted. Please see this correspondence and the portion of the 2020 Ferguson report enclosed for reference.

Reclamation respectfully submits its supporting documentation, position, and supporting argument to the ACHP for ACHP review and opinion regarding Reclamation's determination of no historic properties affected for the cited proposed undertakings of the Goose Bay Marina Berm and Beach, MTAO Project No. CF-21-006 and the Goose Bay Marina Security Fencing, MTAO Project No. CF-21-007. We disagree with the SHPO's approach and constant requests for additional information even though the SHPO has information that 24BW0085 was a modern dump and 24BW0005 was not located after a recent attempt to locate it in 2019.

If you have any questions concerning this letter, please contact me at (406) 247-7666 or by email at rdhanson@usbr.gov. For the hearing impaired, please call the Federal Relay System at (800) 877-8339.

Sincerely,

Rick Hanson
Area Archaeologist

Enclosures

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