



U.S. Department
of Transportation

**Federal Highway
Administration**

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January 8, 2016

In Reply Refer To: HFL-17

Jessica Bush
Review and Compliance Officer
Montana State Historic Preservation Office
1301 East Lockey Avenue
Helena, MT 59620

Re: SHPO File: FHWA – 2015 – 2015080302
Main Boulder River Road Improvements Project, MT SWEETGRASS 210(1)
Section 106 National Register of Historic Places Eligibility Recommendation

Dear Ms. Bush:

The Western Federal Lands Highway Division of the Federal Highway Administration (FHWA), in partnership with Sweet Grass County, Montana proposes to improve 6.82 miles of Main Boulder River Road. The project begins approximately 20 miles southwest of Big Timber, Montana in Park and Sweet Grass County, Montana.

In a continuing effort to identify cultural resource properties that are eligible for the National Register of Historic Places (NRHP) within the proposed project area of potential effects (APE), the FHWA retained Eastern Washington University (EWU) to evaluate prehistoric archaeological site 24SW0754 (see previous July 30, 2015 FHWA letter; SHPO File: FHWA – 2015 – 2015080302). EWU also conducted subsurface investigations in a high probability area within the APE between project stations 1799 and 1805 (see previous July 30, 2015 FHWA letter; SHPO File: FHWA – 2015 – 2015080302). A copy of EWU's report documenting these efforts, a CRABS form and a CRIS form are enclosed for your review and reference.

In their report, EWU (Jones 2015:8) recommends that Site 24SW0754 is not eligible for the NRHP stating:

...the two small tools found at site 24SW754 do not provide significant information regarding the archaeological record.

No dateable cultural materials have been documented and no anthropomorphic soils have been observed as a result of archaeological investigations at site 24SW754. Although the site is located in a river valley likely visited by humans for thousands of years, little evidence of past human activity was discovered. This low density and low diversity artifact scatter appears to represent a brief encampment during travels through the Boulder River Valley at an unknown time in the prehistoric past.

The site area has been heavily disturbed as a result of road construction and maintenance (cf. Herbel and Falkner 2015:15). The site appears to have limited depositional integrity

since only two of the seven total artifacts from the site were found below the ground surface and the remaining five were discovered on the edge of an active county road. Site 24SW754 is unlikely to yield information important in prehistory. This shovel test effort did not result in the identification of any artifacts, features or alternate information supporting site eligibility for listing in the NRHP.

The FHWA agrees with EWU's recommendation that Site 24SW754 is not eligible for the NRHP and requests the Montana State Historic Preservation Office's (SHPO) concurrence with this eligibility recommendation.

EWU did not identify any cultural material in the high probability area between project stations 1799 and 1805. EWU recommends no further work in the high probability area. The FHWA agrees with EWU's recommendation.

In an August 20, 2015 letter (SHPO File: FHWA – 2015 – 2015080302) the SHPO concurred with the FHWA that 24SW0755 (Main Boulder River Road), 24SW0756 (Miller Creek Bridge), and 24SW0757 (Two Mile Creek Bridge) are eligible for the NRHP. As Historic Research Associates, Inc. (HRA) state in their report and FHWA stated in a July 30, 2015 letter to the SHPO, the proposed Main Boulder River Road Improvements Project, MT SWEETGRASS 210(1) will not directly or indirectly alter the defining characteristics of the resource that qualify it for inclusion in the NRHP. Standard maintenance over time and accommodation of modern vehicles has compromised the integrity of materials and design such that proposed project effects of modification to increase passibility for general safety and emergency vehicles, improve roadway conditions, and efforts to reduce long term maintenance should have no adverse effect to this property. **The FHWA requests the SHPO's concurrence with this no adverse effect recommendation.**

The Main Boulder River Road Improvements Project, MT SWEETGRASS 210(1) proposes to replace and demolish the NRHP-eligible Two Mile Creek Bridge and Miller Creek Bridge resulting in an adverse effect to these eligible cultural resources. **The FHWA requests the SHPO's concurrence with this adverse effect recommendation.**

The FHWA has asked the National Park Service's Historic American Engineering Record (HAER) staff to determine what level of documentation is necessary and appropriate to resolve the adverse effects to 24SW0756 (Miller Creek Bridge) and 24SW0757 (Two Mile Creek Bridge). This follows the stipulation in the 2007 Programmatic Agreement signed by the Montana Department of Transportation, Montana Division of the Federal Highway Administration, Advisory Council on Historic Preservation and the SHPO. In a January 7, 2016 email, the HAER staff stated the following regarding the appropriate level of HAER documentation for the Miller Creek and Two Mile Creek bridges:

We recommend Level II documentation for each bridge: 7-10 large format photographs, including context and details, and a historical report using the Outline Format found on page 5 of the HAER Historian Guidelines (<http://www.nps.gov/hdp/standards/HAER/HAERHistoryGuidelines.pdf>) for each bridge.

Two Mile bridge, because of its age and integrity alone, should be well-documented, but we are also interested in seeing the "association with work relief projects related to the Great Depression" explored in some detail, since the bridge's construction pre-dates the Roosevelt Administration's relief agencies and very little is known of the few disparate efforts of the later Hoover years.

The Miller Creek Timber Bridge appears to be a very good later example of a bridge type that was most commonly constructed in the 1920s and 1930s, and therefore might be a good one on which to base a more thorough history of construction techniques.

Again, the FHWA should plan on submitting the documentation for inclusion in the HABS/HAER/HALS collection at the library of Congress.

The FHWA will incorporate the HAER's determined level of documentation into a draft memorandum of agreement and will send a copy to the SHPO for comments.

Sweet Grass County has stated that they do not wish to retain ownership and maintenance responsibilities for the two historic bridges once the replacement bridges have been constructed because of maintenance costs and liability concerns. Per the requirements of the Section 4(f) of the Department of Transportation Act, the FHWA will advertise the Two Mile Creek Bridge (24SW0757) for off-site adoption as an alternative to demolishing the bridge. In consultation with Jon Axline, Montana Department of Transportation Historian, the FHWA determined the Miller Creek Bridge (24SW0756) is not a candidate for off-site adoption considering how the bridge was constructed and the mainly timber construction materials.

I appreciate your attention to these requests. If you have any questions, or should you require any additional information, please contact me at the above address, by phone at (360) 619-7636, or by e-mail at michael.schurke@dot.gov.

Sincerely yours,



Michael Schurke, MA, RPA
Archaeologist

MCS

Enclosure(3)

cc: Seth English-Young, Environmental Protection Specialist, FHWA
Keith Wong, Project Manager, FHWA
Halcyon LaPoint, Archaeologist, USFS

