

BLM Study Review of Hells Canyon Complex Studies

Cultural Resources Management Plan

Technical Report E.4-15

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1.INTRODUCTION

Idaho Power Company drafted this Cultural Resources Management Plan (CRMP) to manage archaeological, historical and cultural resources in Hells Canyon as requested by FERC. The document is guided by federal, state, professional, and corporate laws, regulations and standards. It is a framework to guide protection, mitigation and enhancement efforts for the term of the new FERC license.

2.CONCLUSION

This draft CRMP is a good start for this required document and will assist in the coordination and implementation of the CRMP for the new FERC license

3.STUDY ADEQUACY

The study was adequate as it presented and discussed the required integration and coordination needed to implement the CRMP.

The CRMP was compared against the *Guidelines for Historic Properties Management Plans* established by FERC and the Advisory Council on Historic Preservation. The CRMP follows these guidelines.

4.BLM CONCLUSIONS AND RECOMMENDATIONS

CONCLUSIONS: BLM concludes that this draft edition of the CRMP has laid a solid foundation to craft a final CRMP that will implement the CRMP for the duration of the new license. Minor adjustments to the plan will be required after final discussions are made about site eligibility and project impacts on a site by site basis.

It was beneficial to have the extensive appendix attached to the CRMP that included laws, regulations, policies and other useful information.

Appendix 4.4-b on page 355 did not make any sense to this reviewer.

RECOMMENDATIONS: It was unfortunate that protection, mitigation and enhancement (PMEs) measures were not included for aquatics, recreation, terrestrial and aesthetics impacts as noted on pages 87 and 99. They must be included in the final CRMP.

BLM does not agree that monitoring sites will be beneficial for the cultural resources. Continued monitoring does not help save the resources at risk. The CRMP did not set a limit or trigger that would change the Plan from a monitoring scheme to a mitigating program.

The BLM will request to participate as a primary party to the Programmatic Agreement for the final CRMP.

Any comments the Tribes can add to the Native American overview would be beneficial in understanding context and Native American cultures.

The regional overview would be improved by including dates for Lewis and Clark and the Astorians on pages 30-31.

Only Native Americans can provide valuable information about sacred sites, traditional cultural properties (TCPs) and traditional cultural resources that will help people understand the significance and values for these resources.

The agencies appear to have been left out when discussing mitigation of unavoidable effects on historic properties as discussed on pages 58-59

Within the Table on page 68, the number of sites and the dollar amount may be a typographical error and should be checked.

The BLM will usually support interpretive signs as a form of enhancement

Flexibility of the programmatic agreement was mentioned in the Conclusion on page 100 and that flexibility may be very helpful But Adaptive Management is a concept that should be expanded on because the CRMP should also be flexible as changing technologies, and changing theories may allow creative solutions to cultural resource management problems we will face in the future under the life of the new license.

Dean Shaw should be listed on page 247 for his attendance and participation in the Cultural Resource Work Group for the Idaho BLM.

The *SITE MONITORING* form on page 353 seems adequate on the surface, but it will fail to deliver the required details needed to perform a thorough and informed analysis of the impacts and possible PME's for each cultural resource site. I suggest that each category be further broken down into discrete impacts and a detailed glossary be provided to the field archaeologists charged with determining those impacts in the field.

This reviewer would like to see Appendix 3.1-a expanded to include Smithsonian Numbers, Temporary Numbers, Land Owner/Managing Agency, Component, Site Description, Contracted Archaeologist's Evaluation, Each Tribal Evaluation, Agency Evaluation, IPC Evaluation, SHPO Evaluation, FERC Evaluation, Impact Assessments and Proposed PM&Es. This compilation of data would allow discussions to revise the

Table, then the revised table would be a blueprint to implement the CRMP and a table to track progress into the future for the life of the license.

Change the title to be, "Historic Preservation Management Plan" as the latest guidance advises.

The BLM and IPC seem to agree on eligibility of sites based on the tables in the CRMP but sites AP97-108, -110, -111 were unevaluated, while BLM calls them potentially eligible and AP97-209 was evaluated as potentially eligible, but BLM calls it eligible.