

## **BLM Study Review of Hells Canyon Complex Studies**

### **CULTURAL RESOURCES MANAGEMENT PLAN HELLS CANYON COMPLEX TECHNICAL REPORT APPENDIX E.4-15**

David Sisson, Archeologist, Cottonwood Field Office, Idaho  
November 13, 2002

#### **1. INTRODUCTION**

Cultural Resources Management Plan Hells Canyon Complex, Technical Report Appendix E.4-15, 4.4.2.1.5 Monitoring of Known Eligible Sites Below Hells Canyon Dam

#### **2. CONCLUSION**

Comments relate to the entire section with no specific quote since the topics are mentioned throughout different portions the section.

**The BLM disagrees** with the initial six year monitoring schedule. The initial schedule is too long a rotation and many sites may be severely damaged in six years before the first monitoring exam is ever conducted. The monitoring techniques need to be better defined and focus on more quantitative techniques to better measure site loss and impact agents. There is no definition of what threshold of loss is not acceptable before stabilization efforts are initiated.

#### **3. STUDY ADEQUACY**

The monitoring plan is too general. More specific techniques need to be outlined. Specific sites need to be identified in the schedule and those currently being impacted may be ignored for up to six years before anyone examines the site and the sites may have lost significant information in that time period.

#### **4. BLM CONCLUSIONS AND RECOMMENDATIONS**

**CONCLUSIONS:** The monitoring plan is too general.

**RECOMMENDATIONS:** The monitoring plan needs to include a list of all sites to be monitored and then prioritize those sites with the greatest potential for loss of information. All sites should be monitored within the first three years of the plan initiation. After the first three years the sites can be reprioritized into a six year schedule. Those sites that are impacted the greatest need to be monitored *annually*, not every six years, to ensure significant information is not being lost at too rapid a rate. A mechanism to assess what threshold of damage will be too great and how will is this measured. This will provide a way to initiate stabilization or excavation projects to preserve or recover significant information before it is completely lost. Quantitative monitoring techniques that can be replicated and compared need to be outlined prior to the monitoring plan being implemented to ensure the correct techniques are implemented on the appropriate sites.