

**Archaeological Inventory in Oxbow and Hells Canyon Reservoirs, Hells
Canyon Complex**
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1. INTRODUCTION: In 1999 and 2000, pedestrian surveys and reconnaissance were conducted within a 0.1 mile corridor of the margins of Oxbow and Hells Canyon reservoirs.

2. CONCLUSIONS: Inventories identified 26 archaeological resources within the project survey area. Six sites are recommended as eligible for the National Register and 8 sites are recommended as potentially eligible pending further evaluation. All isolates were considered not eligible.

Two sites on Oregon BLM land were considered ineligible (35 BA 894 and OR-BA-28), and no cultural material could be found at 35 BA 893 - a previously recorded site on BLM land. Four previously identified sites, possibly on BLM, could not be relocated or recorded because they are likely or known to be inundated (35 BA 9, 35 BA 10, 35 BA 23, 35 WA 1). Two isolates were found on Oregon BLM land (HC-6 and HC-7).

Study Adequacy:

- BLM questions the appropriateness of "reconnaissance" methods for the 0.1 mile corridor survey area of the two reservoirs. As one example, areas that should have pedestrian inventory include a corridor along hiking trails on Hells Canyon Reservoir, and areas west of the Oxbow Reservoir road between Cliff Creek and Cottonwood Creek.

BLM agrees with the consulting archaeologists and Idaho Power Company assessment that OR-BA-28, a historic mine adit and disturbed tailings, is not eligible for the National Register. However, BLM does not believe that enough information has been provided to determine 35 BA 894 ineligible. When the site was originally recorded, road construction and dispersed recreation impacts were among the observed impacts. Since that time no additional road construction has occurred. Dispersed recreation and off-highway vehicle travel and parking have continued, possibly affecting site visibility and/or integrity, as suspected. The site may be shallow, but the site record indicates this is "undetermined". Whether or not these impacts are superficial, or if there is any potential for cultural deposits should be more firmly established. Until then, BLM will consider the site to be potentially eligible.

Specific Comments

p.1: "Instead, for the purposes of relicensing, which is the action governing the archaeological inventory reported here, a margin of approximately 0.1 mile inland from the high water line was determined to be a reasonable distance from the water to encompass effects that could be directly linked to the proposed actions....Appropriate lands within the project boundaries are those within the APE that are directly affected by actions directly attributable to Idaho Power. It does not include existing roads and trails to the reservoir, or facilities maintained by and under the jurisdiction of other agencies that may be outside the 0.1 mile margin."

*BLM does not agree that the 0.1 mile margin defines the area of potential effects, nor that "appropriate lands" are those within the APE that are "directly affected by actions directly attributable to Idaho Power." The definition of area of potential effects (APE) in the 35 CFR 800.16 (d) regulations is "the geographic area or areas within which an undertaking may directly or **indirectly** cause alterations in the character or use of historic properties, if any such properties exist. The area of potential effects is influenced by the scale and nature of an undertaking and may be different for different kinds of effects caused by the undertaking." Thus geographic areas in which project influenced actions or activities could affect historic properties should be considered as a part of the APE. For example, this should include, among other locations, places where there are hiking trails, dispersed recreation and off-highway vehicle travel, and potential erosion on the Snake River below Hells Canyon dam.*

p. 3: "This inventory involved a pedestrian (walking) survey of all public (federal, state, and county) lands within the project areas."

The inventory maps do not support this general statement. Maps do not show that all public lands were involved in a pedestrian survey, since visual reconnaissance - using binoculars or from boat (p. 26) - appears to have been employed in many places within the 0.1 mile inventory corridor.

p. 16: Previous Investigations

The discussion omits the McGraw Creek housepit village excavation work (Warren et al 1999). The site is located on BLM land presently inundated by Hells Canyon Reservoir.

Recommendations

1. Evaluation of the integrity and information potential for 35 BA 894 should be more firmly established by additional study.
2. Additional pedestrian surveys should be conducted along Hells Canyon and Oxbow reservoirs.