

**Traditional Cultural Property Assessment of the Hells Canyon Complex and Vicinities.**

**Prepared by Teara Farrow (Cultural Resource Protection Program, Confederated Tribes of the Umatilla) for Idaho Power Company.  
Technical Report Appendix E.4.-13, Chapter 3.**

Reviewed by  
Mary Oman  
Archaeologist  
Baker Resource Area, Vale District  
November, 2002

**1. INTRODUCTION:** Files, literature searches and oral history interviews with 22 elders of the Confederated Tribes of the Umatilla Indian Reservation were conducted to identify traditional cultural properties.

**2. CONCLUSIONS:** "The Hells Canyon Complex and the surrounding vicinities are considered to be Traditional Cultural Properties....Based on the findings presented in this report, the CRPP's highest concern is burials." The CTUIR report makes recommendations for ongoing consultation with Idaho Power Company and land managing agencies.

**BLM agrees** that ongoing consultation with Tribes is needed under the current and future project authorization.

**Study Adequacy:** Stated goals for the study were accomplished. The report is particularly excellent for its regional approach; for providing tribal perspective on traditional cultural properties; providing tribal policy, concerns; and recommendations about ongoing consultation. No evaluations are provided in the report for National Register eligibility of traditional cultural properties (eligibility evaluations do not necessitate nomination to the National Register).

**BLM Conclusions and Recommendations**

**Conclusions:** Locations of traditional cultural use identified by CTUIR elders are within or near to the FERC 1971 project area of potential effect. Some of these locations are inundated by Brownlee Reservoir.

Eligibility determinations are needed to fulfill the requirements of 18 CFR 4.51(f)(4) and 36 CFR 800. Without this information, BLM is unable to identify protection, mitigation, and enhancement measures or assess project impacts to traditional cultural resources on BLM lands. Study plan 8.4.5 is incomplete.

**Recommendations :** To fulfill the requirements of 18 CFR 4.51(f)(4) and 36 CFR 800, the E.4 "Report on Historical and Archaeological Resources" should provide evaluations of eligibility to the National Register for potential or known traditional cultural properties (as defined by National Register Bulletin 38). Study Plan 8.4.5 (November 1999)

acknowledged the need to identify and evaluate eligibility of traditional cultural properties.

The Programmatic Agreement for relicensing the project should clearly delineate jurisdiction, roles and responsibilities for managing cultural resources, and a specific agreed-upon process for ongoing consultation between land managing agencies, Tribes, and SHPOs.