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Date: 05/28/2015 12:25 PM
Subject: TRR cultural resource survey review

Dear Vicki,

Please find attached a letter on behalf of the Colstrip Landowners Group regarding a recent third party review of ICF's cultural resource survey, and the archaeologist's report. I'm in the office today and tomorrow if you'd like to discuss it.

Regards,

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(See attached file: TRR-2015 Colstrip Alternative Final .pdf)(See attached file: Letter to Rutson 5-28-15.pdf)

May 28, 2015

Ms. Victoria Rutson
Office of Environmental Analysis
Surface Transportation Board
395 E Street SW
Washington, DC 20423

Re: Cultural Resource Survey for Tongue River Railroad EIS

Dear Ms. Rutson:

In response to concerns raised by Colstrip Alternative landowners about the accuracy and completeness of the cultural resource survey performed in 2014 by OEA's consultants, ICF International, a third party expert specializing in the region was retained in spring 2015 to evaluate ICF's compliance with NEPA, NHPA, and Montana SHPO standards. Chris Finley trained at the University of Wyoming, had a career in the office of the Wyoming State Archaeologist, and is now the National Park Service's Cultural Resource Program Manager at Bighorn Canyon National Recreation Area. He also conducts field schools, focused on training American Indian tribal members in archaeology, for Northwest College in Powell, Wyoming. He has exceptional expertise in the cultural resources of the area.

Mr. Finley has just produced a report on what he found in eight days of field work conducted in April 2015, with three members of the Crow and Northern Cheyenne tribes, in the proposed Tongue River Railroad project area. He also reviewed site notes and other documentation produced by ICF. His conclusions regarding ICF's methodology, documentation, and conclusions include the following:

- ... (D)ocumentation did not follow guidelines and standards provided in the MTSHPA planning bulletin, and was incomplete, inaccurate, and misleading in providing information for determining potential eligibility of the sites for the NRHP.
- ... ICF had not followed guidelines and standards provided in National Register Bulletin #24 pertaining to the importance of gathering information from local ranchers whose families, in some cases, have occupied the area since the early 1880s.
- During the survey conducted during the course of this project, we examined 20 sites documented by ICF in 2014 on private land. While examining these sites and one area where ICF said they found nothing, 36 undocumented sites were discovered including 5 cairns, 7 lithic scatters, 2 lithic procurement sites, 1 rock shelter, 2 historic rock art sites, 2 stone circle sites, 6 probable prehistoric burials, 2 historic burials, 1 TCP, 6 historic sites, and 4 isolates.

- Overall the quality of (ICF's) survey documentation and maps was problematic with inaccurate and incomplete documentation on most of the site forms

A PDF version of Mr. Finley's report is included as an attachment. Mr. Finley is available at chris_finley@nps.gov.

In light of Mr. Finley's conclusions, the landowners believe that the cultural resource survey as conducted by ICF was inadequate and in violation of relevant law, including the requirement at 36 C.F.R. § 800.4 regarding identification of historic properties that the agency "make a reasonable and good faith effort to carry out appropriate identification efforts, which may include background research, consultation, oral history interviews, sample field investigation, and field survey."

In previous correspondence I have communicated to you the landowners' concerns that important cultural resources were being ignored in the preparation of the Draft EIS. Mr. Finley's report makes clear that these concerns are justified. I believe that a request may be appropriate to the American Council on Historic Preservation under 36 C.F.R. § 800.9(a) for an advisory opinion on the agency's Section 106 compliance. However, out of respect for the agency, I am bringing this issue to your attention before making a request to the Council.

On behalf of the Colstrip Alternative Landowners Group, I request a written response within thirty days to Mr. Finley's report.

Sincerely yours,



Carrie La Seur

cc:

Charlene Vaughn
Shannon Johnson
Richard Starzak
James Walks Along
Stan Wilmoth

Attachment

Cultural Resources Survey Assessment of Colstrip Alternative Route for the proposed Tongue River Railroad

Prepared by: Chris Finley, Retired National Park Service Archaeologist for Bighorn Canyon National Recreation Area

Results of an inventory to evaluate the quality of the Tongue River Railroad Cultural Resource Survey conducted by ICF International, the third party contractor hired to complete the Section 106 process, in 2013 and 2014 on the Tongue River Railroad Colstrip Alternative for the Surface Transportation Board.

Background:

At the request of the Sierra Club and the Colstrip Alternative Landowners group, I visited the Tongue River Railroad Colstrip Alternative project area in 2014 and observed the ICF Cultural Resource Reconnaissance Survey while it was underway. When the collected documentation was released to the individual land owners I received copies of all site forms and support documentation for review from Carrie La Seur the Attorney representing the land owners association. After reviewing the documents it was apparent that the documentation did not follow guidelines and standards provided in the MTSHPO planning bulletin, and was incomplete, inaccurate, and misleading in providing information for determining potential eligibility of the sites for the NRHP. My concerns include:

1. Montana SHPO standard (CRIS) site forms include 5 sections listed below;
 - (A). Location information.
 - (B). Environmental information.
 - (C). Assessment, recording and management documentation.
 - (D). Prehistoric site description.
 - (E). Historic site description.

Only minimal information was provided on section A, D, or E, and section B and C were totally ignored, and information for section D and E were consolidated into a single paragraph.

2. Montana SHPO standard (CRIS) forms also include a separate form to document isolated finds (IF) which very rarely warrant Smithsonian site numbers. The standard isolated find form was not used, and the same format was used by ICF to document sites and isolates.
3. Only three of the site forms provided to landowners had the correct Township/range information.
4. None of the site forms provided to the landowners had the correct UTM Coordinates.
5. There was no environmental information included (specifically surface visibility).
6. There was no information or assessment of eligibility.
7. There were no site maps or illustrations of features.
8. Identification/description of artifacts and features were incorrect.

I was also invited to attend a landowners meeting and it was clear that ICF had not followed guidelines and standards provided in National Register Bulletin #24 pertaining to the importance of gathering information from local ranchers whose families, in some cases, have

occupied the area since the early 1880's. The general consensus of the landowners was that any information they offered was totally ignored by the ICF crew leaders and that opinion was confirmed by the documentation they received from STB after the field work was finished.

In discussions with some of the Tribal Representatives who participated in the surveys the general consensus was that as a result of heavy vegetation cover ground visibility was so poor they felt like they were wasting their time and just going through the motion of conducting a valid survey. They also felt that some information offered to the ICF crew leaders was ignored and downplayed, and this opinion was clearly confirmed in the information included in the site forms provided to MTSHPO by STB.

I also spent time looking at 3 private stone artifact collections from the area and was not surprised to observe that each collection included Paleoindian Projectile Points including examples of Agate Basin, Hell Gap, and Cody Complex, and included Pryor Stem and Jimmy Allen Terminal Paleoindian Projectile Points as well. The majority of points (approximately 75%) from each collection contained examples of Early, Middle and Late Archaic Northwest Plains Projectile Points, and there were a few examples of Late Plains Prehistoric-Early Plains Historic points as well. This information confirmed my expectations that the project area was typical of prehistoric land use utilization throughout the western Plains and foothills of the Rocky Mountains for over 10,000 years, and that significant cultural sites could be discovered during future intensive survey, site testing and data recovery efforts if significant sites could not be avoided, and the project was approved for construction.

After discussing my opinion of the quality of the "Good Faith Effort" by ICF and STB to meet Section 106 obligations the Sierra Club and the Colstrip Alternative Land Owners Group agreed that a field assessment of the ICF reconnaissance survey was in order. The decision was made to spend eight days in the field with my crew looking at a sample of the sites documented by ICF, and to check the accuracy of their documentation and how complete the results of the survey coverage was.

Methodology;

My crew consisted of myself and three members of the Crow and Northern Cheyenne Tribe who have worked extensively with me in the field for several years. Crew members included Hubert B Two Leggings (former Crow Tribal Cultural Director and THPO) who has worked with me for six years, Johnny Tim Yellowtail (former Crow Tribal Cultural Staff member) who has worked with me for five years, and Serina Red Robe (from the Northern Cheyenne Otter Creek Descendants) who has worked with me for four years.

Field work took place between April 12 and April 19, 2015 to take advantage of ground visibility conditions before seasonal vegetation growth would limit ground visibility. The goal of the field work was to locate and evaluate some of the sites documented on private land by ICF during the 2014 field season, determine how complete the survey

coverage was and to visit sites ICF had missed or ignored within the project area considered important to the landowners.

Before field work commenced, a meeting took place with the Northern Cheyenne THPO James Walks Along and my crew to discuss the information submitted to MTSHPD by ICF and what his suggestions and concerns were about the field work we were about to conduct. He will receive a copy of this report, and will have input on how TCP and NAGPRA issues will be addressed.

Results:

Seven separate areas surveyed by ICF during the 2014 field reconnaissance survey were selected for further investigation during the course of the planned 2015 field assessment. A total of 20 previously documented sites were examined in six of these survey areas, and the seventh area is in an area where the ICF crew leader informed the land owners that there were no cultural resources observed on their property.

Area #1: This area is located on land owned by Hugh and Ann Wells, and we examined TR-F-18 and TR-F-19, documented in 2014 by ICF.

TR-F-18: This site was documented as a low density lithic scatter located 15m north of a large sandstone outcrop. The site was plotted on the 7.5' Quad map near the large sandstone outcrop, but the UTM coordinates entered into the site form place the site place 3/8 of a mile east and south of the above mentioned sandstone outcrop. We went to the UTM location listed on the site form and the location did not match the site description on the form. An intense survey of the location led to the conclusion that there were no cultural materials at this location.



Site overview looking east at UTM location of site given on site form.



GPS unit at UTM location given on site shown above (note zone 13 on the GPS).

TR-F-19: There was no problem with this site except ground visibility around the feature was 0%.

Newly discovered sites:

Six undocumented sites and one isolate were discovered in this area including one lithic scatter (A), one isolate consisting of a complete stone knife (B), two rock art sites (C & E), one rock shelter with lithics present (D), one lithic procurement site (L), and one prehistoric burial site, More details on these sites will be discussed in detail in a separate section of this report.

Area #2: This area is located on land owned by the Rocker Six Cattle Company.

TR-F-4: This site is listed as one-tier rock carin constructed of 20 cobbles. During the survey conducted in 2014 this site was identified as a probable burial site by James Walks Along who left a Tobacco offering on the site. Hubert Two Leggings witnessed this event. Apparently the ICF crew leader chose to ignore this information. During our investigation we collected more detailed information and agree with James Walks Along and Hubert Two Leggings that this site should be treated as a potential burial site. Ground visibility was 0% as a result of heavy vegetation cover.

TR-F-05: This site is listed as a “gravel borrow pit” and “appears to be of historic age and associated with gravel extraction activities, possibly for the construction of nearby roads”. There is a well defined road (see photo) entering the pit area from the northeast that was not documented during the 2014 ICF survey. An interview with the land owner would have revealed that the gravel pit and access road was established by the county road department for construction of the existing county road.



County access road to the gravel borrow pit looking northeast.

TR-F-06: This site was listed and described as a one-tier rock cairn. The rocks actually form a half circle (stone alignment) 3.1m X 2.8m with the opening facing northeast. Rock size ranged from 15cm to 30cm, and ground visibility was less than 20% as a result of heavy vegetation cover. The feature was probably used to set up part of a Tipi as a shade shelter during food or hide processing tasks according to Hubert Two Leggins (see photo).



Outline of the half stone circle documented by ICF as a cairn on TR-F-06.

TR-F-07: No problem with this site, and ground visibility was approximately 50%.

Newly discovered sites:

Six undocumented sites or components of ICF sites and one isolate were discovered in this area including the county access road (M) to the gravel borrow pit (TR-F-05), two rock cairn sites (O & AC), two historic structure sites (AB-1 & AB-2), one probable burial site, and one isolate consisting of a single large primary flake exposed on a gopher mound. The above mentioned historic structure was plotted incorrectly (approximately 400m north of its actual location) on the project map, and no site forms were provided for this site, or the historic ranch buildings located directly east of the road in the same area.

Area # 3: This area is located on land owned by the Rocker Six Cattle Company.

TR-E-I-25: No problem with this site.

TR-E-I-27: This site was listed as an isolate with one biface and one secondary stage reduction flake present. During our investigation of the site we found the “biface” (which turned out to be a fragment of a biface) and the secondary stage reduction flake plus an additional 9 flakes, two cores and one additional biface fragment (see photos). This site is not an isolate but a lithic scatter.



Site overview looking east.



Cores found on site.



Biface fragment found on site.

TR-E-63: This site was listed as a one-tier rock cairn and a rock alignment. The “circular cairn” measured 1.5m in diameter. The rock alignment consisted of 15 local sandstone cobbles in a semi-circular format with a diameter of 1.5m. These features are located within 25m of a large cluster of stone circles left undocumented during the ICF 2014 survey, and are most likely hearths. Eight stone circles each with a well defined internal hearth were documented on this site (H), and several of the internal hearths associated with the stone circles are similar to the two features documented during the 2014 ICF survey, and fall within the same size range.

TR-E-65: This site was listed as a poorly defined and abandoned two track dirt road, and is shown on the 7.5' Quad map as being approximately 1000 feet long. This is not a poorly defined two track road, but is an abandoned section of the county road. The

feature is well defined with a flat road bed with borrow pits on both sides for the entire length, and ties back into the existing county road ½ mile north of where it leaves the existing county road as indicated on the 7.5' Quad map included with the site form. There is also a well defined irrigation ditch (undocumented by ICF in 2014) that courses along the west side of this road on the north ½ of the abandoned county road segment (also undocumented by ICF in 2014).



View of abandoned county road looking northeast where it leaves the existing county road.



View of abandoned county road looking south near where it ties into the existing county road on the north end.

Newly discovered sites:

Five undocumented sites or components of ICF sites were discovered in this area including the northern segment of the abandoned county road ((TR-E-65) one lithic

scatter (F), one isolate consisting of 3 secondary flakes (G), one stone circle site (H), and one abandoned historic irrigation ditch (I).

Area # 4: Located on land owned by the Rocker Six Cattle Company.

TR-E-44: This site is listed as four one-tier stone circles (tipi rings) constructed from large local sandstone and scoria cobbles. All of the members of my crew agree with me that this is not a stone circle site. The rocks were loose on the surface, and there was no evidence of sodding or lichen deposits. Also, the rocks were too small (10cm to 15cm) to weight down a tipi. Average rock size on Stone Circle site H located approximately 2 miles north of this site was 20cm to 30cm, and the rocks were heavily sodded in, and had well developed lichen deposits on the rocks, or TR-E-45 just west of this site that was described as a possible effigy that was actually a cluster of 4 Tipi rings complete with internal hearths, with rock size averaging >30cm in size with the rocks heavily sodded and with well established lichen deposits. The land owner also informed us that approximately 1000 head of cattle are trailed back and forth through this site in the spring and fall resulting in a constant rearrangement of the loose surface rocks. This site was also plotted on the west side of the county road on the 7.5' quad map provided with the site form. The site is actually located on the east side of the road as indicated by the UTM coordinates and site photos included in the site form (see photo).



Rock from the supposed tipi ring on the site.

TR-E-45: This site was described as a stone alignment, “possible effigy” constructed of local sandstone and scoria cobbles and boulders. The “possible effigy” was actually a cluster of 4 Tipi rings complete with internal hearths, with rock size averaging >30cm in size with the rocks heavily sodded with well-established lichen deposits (see photos).



Stone circle #1 on the left, and stone circle #2 on the right.

TR-E-46: This site is listed as a “gravel borrow pit” and “appears to be of historic age and associated with gravel extraction activities, possibly for the construction of nearby roads”. An interview with the land owner would have revealed that the gravel pit and access road was established by the Rosebud County Road Department for construction of the existing county road.

TR-E-47: This site was described as seven small shallow depressions that were used for prehistoric and / or historic warfare and/or hunting. Three of these shallow depressions on the flat area on the south end of the “site” are probably there as a result of the installation of the power line located just south of this area to provide water for a well just north of the Rocker Six Corrals documented as TR_F-BO45. It was common practice to park the auger truck for the night and run the auger into the ground to secure the boom and avoid damage during high wind episodes. The land owner remembers the vehicle parking there during installation of the power line (see photo of Hubert Two Leggins on his knees in one of these depressions). The other four depressions are in different stages of sod restoration as is clearly illustrated in site photos of feature 1 and feature 2 (where the edges of the disturbance have not even slumped in yet in feature2). These depressions are not depressions that were used for warfare or hunting blinds, but are simply the result of depressions (i.e., bull wallows) caused by bulls rooting and throwing/pawing dirt over their backs with their front legs during mating/fighting or to protect themselves from biting insects (face flies, horse flies, etc). There was a fresh example of this disturbance documented and photographed on TR-E-I-15 recorded as an isolated find by ICF in 2014 (see photo). My crew agreed with me that these features are

not associated with prehistoric and/or historic warfare and/or hunting, and should not be included in this project as cultural resources.



Burdick Two Leggins on his knees in one of the auger holes.



Fresh “Bull Wallow” from last fall measuring 1.2m X 1.4m in diameter, and 20cm deep.

TR-E-56: This site was described as “a petroglyph of undetermined age”. This petroglyph is the letter “N” etched into the rock face. Segments of the etching show no evidence of weathering, and 1/3 of the etching looks like it could have been done within the last few years. There is no date associated with this etching, and in my opinion it is not over 50 years old, and therefore should not be documented as a historic property.

Newly discovered sites:

There was one undocumented lithic scatter discovered in this area (AD) during our survey.

AREA #5: This area is on land owned by the Rocked Six Cattle Company.

TR-E-I-15: This site was documented by ICF as an “Isolate” with three flakes and one fragment of shatter. Our survey revealed a large lithic scatter at this location with approximately 100 porcellanite flakes 2cm to 5cm in size (mostly secondary and tertiary), three tertiary non-volcanic glass flakes and the midsection or a gray porcellanite projectile point 23mm long, 17mm wide, and 4mm thick (probably Late Prehistoric). There was also evidence of final stage reduction micro-flakes included in the majority of gopher mounds scattered across the site indicating subsurface deposition of cultural material. Ground visibility was estimated at 10% to 40% over the majority of the site with the exception of a slump area on the east side of the side of the site where the projectile point fragment and several flakes were exposed. The site was 40m long on a north/south axis, and 10m wide on an east/west axis. There was also a bull wallow on this site that was most likely made last fall, and was photographed to provide a fresh example of the bull wallows described as “pits described by ICF as possibly used for prehistoric and/or historic warfare and/or hunting” by ICF on TR-E-47 (photo will be included in both sections of this report). The bull wallow was 1.2m X 1.4m in diameter, and 20cm deep.



Site overview looking southeast.



**Gray Porcellanite projectile point midsection.
flake.**



**Non-volcanic glass tertiary
flake.**



**Fresh "Bull Wallow" from last fall measuring 1.2m X 1.4m in diameter and 20cm
deep.**

TR-E-26: This site was documented as a “low density” lithic scatter with 10 flakes present. During our survey we documented 18 flakes, 1 large gray porcellanite core, and 1 gray porcellanite scraper 58mm long, 31mm wide, and 7mm thick.



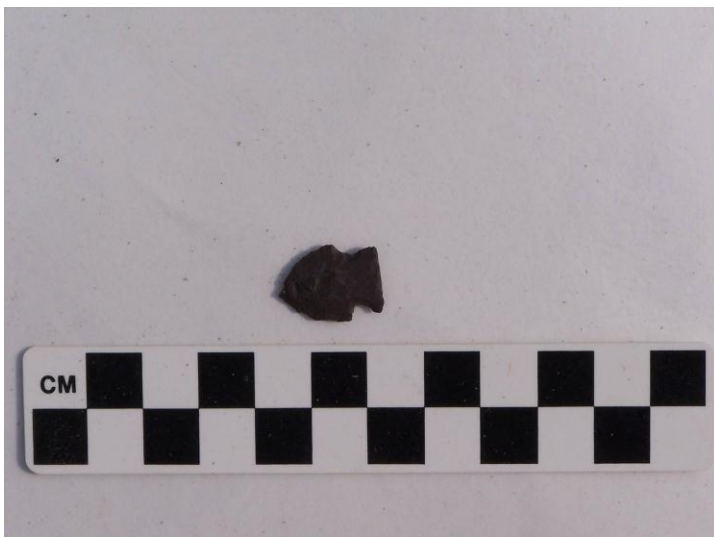
Scraper found on site.

TR-E-27: This site was documented as a “low density lithic scatter, and all we found different from their documentation was the presence of a gray porcellanite core.

TR-E-28: This site was documented as a low density lithic scatter. There was no problem with this assessment except we found a stage 4 gray Porcellanite biface fragment 45mm long, 17mm wide, and 6mm thick, and a complete Late Prehistoric side notch projectile point 18mm long, 12mm wide, and 3mm thick on this site (see photos).



Gray Porcellanite Biface fragment.



Dark purple Porcellanite side notch projectile point (Late Prehistoric).

TR-E-29: This site was not included on the project map.

Newly discovered sites:

There were 2 undocumented isolated finds and one undocumented lithic scatter found in this area during our survey. One isolate consisted of a gray Porcellanite retouched flake (AH), and the other isolate was a red Porcellanite scraper (AE). The lithic scatter (AG) consisted of 11 red and gray Porcellanite flakes, 1 red Porcellanite core, and the distal end of a gray Porcellanite projectile point fragment

21mm long, 15mm wide, and 3mm thick (probably Late Prehistoric). All but two of the artifacts documented were found in a blowout area on the north side of a large sandstone boulder indicating the possibility of buried cultural material on the site. Ground visibility around the blowout area was less than 10%.

Area #6: This area is on land owned by the Rocker Six Cattle Company.

TR-E-14: This site was documented as a “low density lithic scatter” consisting of 100-200 flakes. That many flakes on this site should not be considered low density. The only place ground visibility on this site is 100% is in the two track road passing through the site. Some areas of the site have approximately 20% ground visibility, but ground visibility on the majority of the site and the surrounding area is 0% due to heavy ground cover vegetation (see photos attached to site form for an example).

Newly discovered sites:

There was one probable burial site and one stone circle site (AF) discovered in this area.

Area #7: This area is on lands owned by Hank Coffin and Kirk Green. Hank Coffin (a Crow Tribal Member) was informed that no cultural resources were found on his land even when he offered to show the ICF crew leader sites he knew were there. Kirk Green tried to show the ICF crew leader a “Box Burial” and was told that “they (ICF) did not know what a Box Burial was and would not deal with it”.

Newly discovered sites:

On Hank Coffin’s property we documented 9 sites including two burial sites documented as 1 probable cairn burial that could be either prehistoric or historic in origin, and 1 historic burial (a family member of Hank Coffin) with documentation. We also recorded 1 TCP with documentation, 3 lithic scatters (S,V, & X) 1 lithic procurement site (W), 1 cairn, and 1 historic site that was reported to be an historic military artillery emplacement(U).

On Kirk Green’s land we documented 2 sites including 1 crevice burial and 1 Box burial which contained a hand made coffin made sometime between 1888 and 1900.

There are ten site forms that warrant comment that contain errors in site identification/evaluation, or artifact identification, and comments related to these issues are listed below.

TR-E-I-23: This isolate was identified as a “Historic wood frame hitch”. This isolate is actually an axel off of a horse drawn wagon (most likely the rear axel).

TR-E-15: This site is listed as one oval rock cairn 1.5m X 2m in size. The size and shape of this cairn is similar to the other burial cairns discovered in this area, and the

function of this cairn should be examined closely by Tribal Representatives for their input.

TR-F-21: No (CRIS) site form was included for this site. Only the photo which was blurred, and the 7.5' Quad site location map where provided to the landowner.

TR-E-23: This site is listed as “three one-tier stone circles” and go on to say that “Abundant cobbles of the same material present in the area, and it is uncertain as whether the resource is cultural or not”. If ICF had doubts about this site being real they should not have recorded it as a site. Look at the situation on TR-E-44 as an example of a stone circle site ICF claimed was a site.

TR-E-43: This site is listed as a “one-tier rock cairn approximately 20cm in diameter”. The photo shows a feature that resembles a rock lined hearth that is commonly found as a hearth associated with stone circle sites in the area.

TR-E-52: This site was documented as a “one-tier rock alignment of 4 local cobbles and one small petroglyph”. The photos show all of the rocks loose on the surface with no indication that the stones were ever imbedded in the sod as should be expected if the rocks were old enough to be associated with a prehistoric site. The photo of the petroglyph is of poor quality, and better photos and a detailed drawing should have been included with the site form.

TR-E-53: This site was documented as “two rock cairns measuring 2.5m X 2.5m and 1.5m X 2m in diameter. In the documents provided to the landowners, cairns are described as piles of rocks of various sizes, typically ranging from several stones to large stacks of rocks. The photos with the site form show stone circles as described in the site forms, and stacked (to model the natural slope). These features are typical of rock hunting blinds found in the Tongue River area, on the hill tops east of TR-F-BO45 (Rocker Six Corral), and throughout the western edge of the plains of Colorado, Montana and Wyoming.

TR-E-54: This site was documented as “three rock cairns measuring 2m X 3m, 2m X 2m, and 2m X 2m in diameter. As described above in regards to the actual description the features, they are not cairns, but stone alignment features that form possible hunting blinds. These features are typical of rock hunting blinds found in the Tongue River area, on the hill tops east of TR-F-BO45 (Rocker Six Corral), and throughout the western edge of the plains of Colorado, Montana and Wyoming.

TR-E-58: This site was documented as “two rock cairns measuring 2.5m X 3m, and 2m X 1.5m in diameter. Once again, these features are described by ICF as linear features, but are called cairns (stacks of rocks).

TR-E-60: This site was documented as one tipi ring constructed of 8 sandstone cobbles and measures approximately 4m in diameter, and one semi-circular rock alignment 1m in diameter. I would question the reality of this tipi ring having only 8 rocks to determine a

stone circle 4m in diameter. Also, the rocks visible in the photo appear to be too small to be part of a tipi ring as previously mentioned in relation to site TR-E-44 documented by ICF.

Summary: During the survey conducted during the course of this project, we examined 20 sites documented by ICF in 2014 on private land. While examining these sites and one area where ICF said they found nothing, 36 undocumented sites were discovered including 5 cairns, 7 lithic scatters, 2 lithic procurement sites, 1 rock shelter, 2 historic rock art sites, 2 stone circle sites, 6 probable prehistoric burials, 2 historic burials, 1 TCP, 6 historic sites, and 4 isolates. Ground visibility in the project area was mostly poor (0% to 20%) as a result of heavy vegetation cover, and I'm sure that we would have discovered more sites and more cultural material on the sites we did document if ground visibility had been better.

Overall, the quality of the survey documentation and maps was problematic with inaccurate and incomplete documentation provided on most the site forms, several of the 7.5' Quad maps provided with site forms, and even the project maps had sites plotted in the wrong place or omitted from the maps. We found more lithic material on the majority of the sites ICF documented as lithic scatters, and in one case a site listed as a lithic isolate with 4 artifacts turned out to be a large concentration of lithic material with an obvious buried component. There were also several sites that were miss-identified, and it was questionable if some of the sites were even cultural, or old enough to be considered historic properties.

Field notes and photos (with the exception of the TCP and burial sites) will be provided as a separate document. Information on the TCP and burial sites will be provided **as needed** after tribal representatives have had the opportunity to comment on the data collected during the documentation process.

For further information contact me at chris_finley@nps.gov.

Chris C. Finley