
CULTURAL RESOURCES FIELD INVESTIGATIONS STUDY PLAN

Final

**ROCKY REACH HYDROELECTRIC PROJECT
FERC Project No. 2145**

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(Discussion Copy, 2/16/01)



**Public Utility District No. 1 of Chelan County
Wenatchee, Washington**

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SECTION 1: INTRODUCTION

1.1 Project Location

The Rocky Reach Project is located approximately seven miles north of the city of Wenatchee on the Columbia River in mid-Washington State. The dam is 215 river miles below the Canadian border and 473 river miles above the mouth of the Columbia at Astoria, Oregon.

The Rocky Reach Project contains a total of 1,345 acres of which Chelan County PUD owns about 100 acres and holds flowage easements for all lands within the FERC project boundary. The federal government owns 160 acres of shoreline in the Rocky Reach Project divided between the Forest Service, the Bureau of Land Management, and the Bureau of Reclamation. The remaining lands within the project boundary are in private ownership, industrial development, agricultural development, used for transportation, or are recreation facilities (PUD 1999:Exhibit E.6).

1.2 The Columbia River

Rocky Reach Dam is located in Chelan County in north central Washington. Lake Entiat, the Rocky Reach Project reservoir, extends upriver 43 miles (to Wells Dam) and has a surface area of approximately 9,100 acres. The reservoir contains 36,400 acre-feet of usable storage. The drainage area of the project at the dam is about 90,000 square miles. The watershed lies east of the Cascade Mountains and west of the Rocky Mountains, consisting of parts of Washington, Idaho, Montana, and British Columbia. The normal headwater elevation is 707 feet above sea level. The normal tailwater elevation is 614.7 feet above sea level. The average annual minimum water temperature of 34°F normally occurs during the month of February. The average annual maximum water temperature of 65°F occurs during the months of August and September.

1.3 Physical Setting

The state of Washington encompasses a wide range of geographic diversity, from the marine influenced ocean shores and the Puget Sound, over the rugged Cascade Mountain Range to the rolling hills of central Washington, to the ancient mountain ranges of north central and eastern Washington. The Rocky Reach Project is located on the Columbia River between two significantly different physiographic areas. In the Cascade Mountains to the west, a metamorphosed sedimentary, volcanic, and granitic rock predominates. On the Columbia River Plateau to the east, vast, thick layers of basalt cover bedrock. The vegetation ranges from forest and alpine meadows in the Cascades, down to the fertile, irrigated valleys near the Columbia and back up to sparsely vegetated arid plateaus to the east.

Flooding has played a critical role in the geomorphology of the Rocky Reach as well as in development of and changes in prehistoric settlement patterns within the study area (Schalk and Mierendorf 1983:633-647). Four alluvial periods have been identified for the Rocky Reach section of the Columbia River that coincide with changes in prehistoric settlement patterns, beginning about 8200 B.P. and continue into the historic period (Schalk and Mierendorf 1983:640).

1.4 Climate

The climate in the vicinity of the Rocky Reach Project is semi-arid, which is typical of eastern Washington. There is a seasonal range of temperatures in the area with winter averaging about 25°F and summer about 75°F. Spring and Fall temperatures average 50°F. Extreme temperatures can approach -30°F in winter and 110°F in summer. The precipitation is generally low with an annual average of about 10 inches, the bulk of which falls between October and March. There are usually no more than eight to 15 inches of snow on the ground.

1.5 Cultural Resources

An intensive archaeological survey of the shoreline of the Rocky Reach Project was conducted in 1981 as part of a plan to raise the reservoir level. The purpose of the study was to inventory and document cultural resources that might be affected by the pool raise, and to identify those sites that were currently being affected by the existing reservoir level and Project operation. The survey, which included an evaluation of all previously known archaeological investigations on the reservoir, identified a total of 47 cultural resource sites. The inventory results were documented in an extensive overview document (Schalk and Mierendorf 1983). Supplemental investigations were also conducted that same year (Simmons et al. 1983) for the “Exhibit R” recreation sites in the reservoir. In preparation for a license amendment for the proposed pool raise, a resurvey of the project area was conducted in 1990 (Galm 1990). The 1990 survey found additional cultural materials at four of the sites that were surveyed in 1981. The 1990 resurvey resulted in the recording of twelve new sites and eight sensitive areas. Sensitive areas are locations where no cultural materials were noted but site physiography indicated that these areas should receive further consideration (following the predictive modeling as recommended by Schalk and Mierendorf (1983)).

As a result of the above cultural resource work, Chelan PUD contracted with Archaeological and Historical Services in the fall of 1990 to test 14 sites, two of the sensitive areas, and to complete National Register of Historic Places (NRHP) evaluations for three sites (Boreson 1992).

Based on the extent of time that has passed since the last cultural resource investigations within the reservoir, it seems likely, based on the findings of Galm (1990) and Boreson (1992), and the hypotheses developed by Schalk and Mierendorf (1983), that additional erosion has occurred at known sites and that other previously unidentified sites may exist. Therefore, the project area will be resurveyed as part of the relicensing effort.

The tasks for 2001 fieldwork and the resulting report will incorporate some of the recommendations from the 1983, 1990, and 1992 investigations and will be supplemented by recommendations developed as a result of this study. There are a total of 59 archaeological sites and eight sensitive areas that have been currently identified within the Rocky Reach pool. The survey will incorporate identifications of sensitive areas (Schalk and Mierendorf 1983; Galm 1990) and special survey techniques (Schalk and Mierendorf 1983; Galm 1990; Boreson 1992) from the recommendations of the earlier studies. The reporting will include more detailed historic and ethnographic studies as recommended by Schalk and Mierendorf (1983). Other recommendations from the earlier studies relate to project specific activities and monitoring of sites through time; issues that will be addressed in the cultural resources management plan.

SECTION 2: STUDY GOAL

The goals designed for this study plan are outlined as follows:

1. Initiate and complete a field inventory for cultural resources within the Area of Potential Effect (APE). This goal will complete the first part of Step 9 of the Section 106 Compliance Table (Table 2-1)
2. Determine whether sites are eligible for the National Register of Historic Places. This goal will complete Step 9 of the Section 106 Compliance Table (Table 2-1).

Table 2-1: STEPS FOR SECTION 106 COMPLIANCE ROCKY REACH RELICENSING				
		DESCRIPTION	STATUS	SCHEDULE
1	Establish policy-level consultation	FERC should initiate policy-level consultation with agencies and tribes. FERC may decide to delegate day-to-day consultation to Chelan PUD.	FERC mailed a letter to address this issue. Next steps: Once the letter is received, next steps will be identified.	Letter received from FERC May 24, 2000
2	Select consultant/advisor to Chelan PUD	Chelan PUD will select a consultant to provide Section 106 and technical guidance to the working group and Chelan PUD.	Complete. Western Historical Services has been selected.	January 28, 2000
3	Organize working group and establish roles	A cultural resources working group will be created. Members may include federal and state agencies, Native American tribes, Chelan PUD, and members of the public.	Complete. The working group has been created and meets on an as needed basis.	November 10, 1999
4	Establish goals and objectives	The goal is to fulfill of Section 106 consultation requirements through collaborative development of a Cultural Resource Management Plan (CRMP).	Complete. Goals have been established and the steps for Section 106 have been agreed upon.	March 20, 2000
5	Develop study plan outlines	Past work will be summarized and holes will be identified. The working group will determine the need for a background overview.	Past work has been summarized and reported to the working group. The working group agreed that the Schalk and Mierendorf (1983) serves as an overview.	Discussed at March 20, 2000 working group meeting.
6	Select consultant(s) for background overview (if required)	N/A	N/A	N/A
7	Select consultant(s) for TCP studies	Consultants will be recommended by both the Yakama Nation and Colville Confederated Tribes. Proposals will be requested by Chelan PUD.	A contract has been awarded to Archaeological Frontiers to complete this study on behalf of the Yakama Nation. TBD for CCT.	Final report due March 31, 2001
8	Complete TCP studies	TCP Reports will be submitted to the working group for review.	Underway for YN.	Report due February 30, 2001
9	Determine field studies required -Phase 1 (pedestrian survey) -Phase 2 (site testing and determination of eligibility)	The working group will examine existing information to determine the need for cultural resources field investigations. Methods for recommended studies will be developed by the working group.	Summarized in study plan for 2000.	To be discussed at June 07, 2000 meeting.
10	Select consultant(s) and complete field studies	Consultants will complete the studies and provide reports to the working group for review.	To be determined.	
11	Develop a Cultural Resource Management Plan (CRMP)	The working group will collaboratively develop a CRMP that will be incorporated into the new license.	To be determined.	Complete by June 2003
12	Develop agreement documents	If necessary, a programmatic agreement or memorandum of agreement may be developed between the consulting parties and FERC.	To be determined.	
13	Implement CRMP (Protection, Mitigation, & Enhancement)	The CRMP will be implemented under the new license.	Implementation will begin after new license is issued.	June 2004

SECTION 3: STUDY AREA (AREA OF POTENTIAL EFFECT)

The proposed APE for this study consists of the Rocky Reach Project boundary and lands immediately adjacent to the boundary and/or likely to be directly impacted by project operations. The Rocky Reach boundary is defined by contour lines on each side of the reservoir beginning at elevation 711 feet MSL at the Rocky Reach Dam upstream to 734 feet just below the Wells Project tailrace. The boundary varies in elevation along the reservoir and corresponds to areas likely to be impacted by water surface elevation associated with the probable maximum flood (Chelan PUD1997). The Rocky Reach Project contains a total of 1,345 acres of land, of which Chelan PUD owns approximately 100 acres, or seven percent. The study area includes shorelines of islands in the reservoir up to 711 feet in elevation and park facilities developed by the PUD.

SECTION 4: METHODOLOGY

The development of the Chelan County Public Utility District (PUD) research methods for the Rocky Reach Hydroelectric Project is designed to be a collaborative effort between the members of the Rocky Reach Cultural Resource Working Group (CRWG). The members of this working group are expected to communicate and provide input as to their needs and areas of expertise. Collaboration on completing the goals outlined above will be a high priority.

Methodologies for conducting fieldwork will be developed by the PUD and its consultant (WHS) with review and concurrence by the CRWG. Methods will be attached as an appendix to this study plan.

SECTION 5: TASK LIST

5.1 Task 1: Field Inventory of the Rocky Reach Reservoir

Tasks for the field survey are as follows.

1. The contractor will be responsible for obtaining ARPA and necessary state permits necessary to conduct on the ground inventory and possible shovel testing within the project area.
2. The field inventory task should be initiated by a review of the documents produced in 1983, 1990, and 1992. Survey methods will follow standardized techniques acceptable in the field of archaeology and will include:
 - a. Use of Global Positioning System (GPS) data to record locations of known and identified sites during the course of the fieldwork.

- b. A mapping datum for each site shall be shown on the site map and identified by GPS coordinates for future reference. Site mapping datums shall be located in or near the site center as perceived during the inventory phase. The use of a temporary in-field datum marker may be used on sites that are recommended for future investigation; however temporary markers should be discrete and yet easily relocated. Long, linear sites shall have GPS coordinates taken at the mapping datum and at each end of the site.
 - c. All sites shall be mapped using contour intervals to graphically represent variation in landforms and site distribution on the landform.
 - d. All sites shall be photographed showing a general overview of the site in relationship to the reservoir and the landform on which the site occurs. Close-up photos of features or artifact clusters will be necessary documentation as well.
 - e. Although a general non-collection strategy (following guidelines developed for federal agencies, and SEPA guidelines on private property) shall be employed, documentation of artifact distribution and types will be necessary. This shall be conducted by surface sample unit counts of artifacts. Diagnostic artifacts shall be analyzed in the field. This analysis shall include specific measurement of size, element attributes, edge angle, and material type. Following field analysis these artifacts shall be moved from visibility by placing them under rocks or out of site. The relocated position of these artifacts shall be shown on site maps. Artifacts found at sites that are eroding or are being adversely impacted by some disturbance, or diagnostic artifacts that are considered to be of unique cultural value such as stone bowls, Clovis, Windust, or other Paleo-Indian projectile points, pipes, or other similar and unusual artifacts, shall be collected, placed in appropriately labeled bags. Artifacts will be stored with the PUD pending further investigations at the site, or until agreement is reached on curation at a Federally-acceptable repository or museum. Any artifact that is collected shall have GPS coordinates that are documented on the site map and on the artifact bag label.
 - f. Washington State site forms shall be completed for each site relocated or identified during the 2001 field inventory.
3. Special survey techniques, such as auguring, shovel test excavations, or use of remote sensing shall be employed on erosional landforms or those landforms with planned or prospective development. However, no shovel tests shall occur on private property.
 4. **Inadvertent Exposures or Burials.** Although human remains and burials are not anticipated to be exposed during the survey along the Rocky Reach shoreline, it is always possible that burials may be inadvertently exposed by erosion processes or as part of shovel testing procedures. Should any human remains be exposed during the survey phase, all work in that area shall be halted and the Chelan

County PUD contract administrator shall be notified immediately. Chelan PUD will make all other necessary notifications.

Any exposed human remains shall be discretely covered and treated with respect until tribal and state officials along with the Chelan PUD and any federal agency involved have determined and agreed upon a course of action for removal and reburial or other treatment of any burials. There shall be no photographs taken or any analysis conducted on human remains exposed during testing without the explicit direction from the Chelan County PUD.

5. As part of the 2001 field inventory, more detailed historic and ethnographic studies need to be conducted:
 - a. Ethnographic field research with knowledgeable members of Middle Columbia tribes will be undertaken as part of the Traditional Cultural Properties studies and shall be included, in summary form, in the field inventory report if available.
 - b. Archival collections of documents, photographs, maps, and other information pertaining to the study area shall be examined as part of the 2001 fieldwork season and these documents should be incorporated into the survey plan, mapping of sites, and in the report of findings.
 - c. A more complete history, especially about the flooded Entiat townsite and other socio-economic studies shall be incorporated as part of the background research for this project.

In addition to these items, additional studies shall be undertaken in this regard and included in the inventory report: The overview for the Rocky Reach project (Schalk and Mierendorf 1983) did not include these topics in the ethnographic/ethnohistoric chapters and this data shall be included as a supplement to that study:

- d. An examination of the reservation period and its effects on native peoples living within and adjacent to the project area. There is some indication that Indian allotments may have existed within the project area. Indian allotments and their disposition will need to be addressed in the reports; and;
 - e. A detailed study of the effects of native and white interactions following contact and settlement periods and how these interactions continue today.
6. The report of findings shall include a summary of the background research including discussions of the Mid-Columbia chronologies, previous research including discussions of the theoretical basis under which earlier studies were undertaken, a discussion of the sites previously investigated and the current status of each previously recorded site, a discussion of the findings of the 2001 year survey, discussions of data gaps, discussions and assessment of high-sensitivity localities as identified during the 1990 fieldwork, analysis of materials observed and/or collected and recommendations for future work. Considerations for

evaluations of selected site types, Determinations of Effects on National Register properties, and treatments of archaeological properties should also be included as recommendation topics within the report.

SECTION 6: ANALYSIS AND REPORTING

To be completed later following input from the working group and based in part on Section 5 tasks.

SECTION 7: STAFFING AND EQUIPMENT NEEDS

The contractor selected by Chelan PUD and the CRWG when this study plan has been approved will determine Staffing and Equipment needs for conducting the field inventory studies. The contractor as part of a proposal to conduct these studies will provide Staffing and equipment. Contractors will be encouraged to employ interested and qualified tribal members as cultural resource technicians for fieldwork in this project. Contractors will be encouraged to interface with knowledgeable tribal elders regarding Indian homesteads in the project area.

SECTION 8: SCHEDULE

Prior to onset of the field season, the contractor selected for this project will need to obtain necessary ARPA permits. There will be a 30-day review period by federal and state agencies, tribes, and the CRWG prior to issuance of the permits. Fieldwork for the on-the-ground inventory of the Rocky Reach reservoir may begin as soon as a request for proposal (RFP) and scope of work has been prepared by the PUD and the permitting process has been completed. Fieldwork is anticipated to occur in the late spring, 2001. The scope of work will be reviewed by the CRWG and included in the RFP.

SECTION 9: BUDGET

The contractor(s) chosen to conduct the tasks listed above and to produce written documents of their research will need to submit a budget to be approved by the PUD prior to commencement of further fieldwork, research, or report production.

SECTION 10: NEXT STEPS

Following completion of the inventory phase, it is anticipated that a number of cultural properties, including some historic-period properties may need further evaluation to determine their eligibility for inclusion on the National Register. Depending upon the date that fieldwork is completed, it is possible that additional fieldwork, such as testing, may be conducted. It is also possible that some of the sites revisited or identified during the 2001 field inventory season may provide sufficient evidence from the survey and shovel testing to complete determinations of eligibility without additional fieldwork.

SECTION 11: REFERENCES

- Boreson, Keo. 1992. *Cultural Resource Investigations Along the Rocky Reach Reservoir: The 1990 Test Excavations*. Eastern Washington University Reports in Archaeology and History 100-75. Archaeological and Historical Services, Cheney.
- Galm, Jerry R. 1990. *Cultural Resource Investigations in the Rocky Reach Reservoir: The 1990 Resurvey*. Archaeological and Historical Services Short Report SR 228. Eastern Washington University, Cheney.
- Public Utility District No. 1 of Chelan County, Washington (Chelan PUD) 1997. Rocky Reach Hydroelectric Project Periodic Safety Inspection Report. Chelan County Public Utility District No. 1, Wenatchee.
- Schalk, R.F. and R.R. Mierendorf. 1983. *Cultural Resources of the Rocky Reach of the Columbia River*. Center for Northwest Anthropology Project Report Number 1. Washington State University, Pullman.
- Simmons, Kim A., Mary P. Rossillon, and Randall F. Schalk. 1983. *A Cultural Resource Survey of "Exhibit R" Recreation Sites in the Rocky Reach Reservoir*. Laboratory of Archaeology and History Project Report Number 16. Washington State University, Pullman.

APPENDIX A: FIELD METHODOLOGIES FOR THE INVENTORY PHASE

Survey of the Rocky Reach Reservoir shall be conducted by pedestrian survey for the entire length of the reservoir. The project area to be surveyed includes the entire length of the reservoir and islands within the reservoir, and extends to the PUD easement or ownership boundary lines on both sides of the reservoir. Vehicular access to the project area for most of the reservoir is easily attained by roads. However, there are some locations, primarily at the north end of the reservoir, and islands that will need to be accessed by boat. The contractor will be responsible for providing its own boat to complete a 100 percent survey of the project area.

Access to private properties within the project area for passage to PUD properties or for survey and shovel testing on easement lands will be obtained for the contractor by the Chelan County PUD. All private property landowners or tenants will be notified by the contractor prior to egress onto private properties. The PUD will attempt to obtain permission from private landowners for survey of private properties. Landowner names and phone numbers will be provided to the contractor by the PUD. There are issues in the Rocky Reach surrounding Indian allotments. The contractor will need to work with the Colville Confederated Tribes and the BIA to identify Indian Allotments within the project boundaries.

The focus of the inventory phase shall be to identify previously unrecorded sites and to revisit, assess, and update site forms at sites that have been previously identified, recorded, and in some cases excavated. Transect intervals throughout the project area shall not exceed 15 m in width. This transect interval will assure complete and comprehensive survey coverage of the entire reservoir shoreline area. The inventory phase is anticipated to occur during periods of normal to low flow. Survey is to be primarily focused on landforms above the normal pool level. Survey shall include the entire area within the project boundary. All sites and isolated occurrences documented in the project boundary shall include the time of day and river mile location recorded so that pool level data can be obtained for these locations. The contractor shall be responsible for obtaining daily pool level data and including this data on the site forms and in the draft and final reports. GPS readings also shall be taken for these locations. Shorelines often include cultural materials that are out of context, so the documentation of new sites in these areas must be accompanied by comprehensive justification of site content and context in these areas. However, where previously recorded sites extend below the normal pool level, assessment of the site condition at the time of this inventory shall to be included in site update records.

All diagnostic cultural materials will be documented and analyzed in the field during the inventory phase. The location of all collected diagnostic materials will be included on site and project maps. A universal transverse mercator (UTM) GPS location shall be provided for each diagnostic artifact identified during the inventory. This data shall be included on each site form with the drawing of the diagnostic artifact or on each isolated occurrence form.

All isolated occurrences shall be identified on a form developed by the contractor and approved for use by the Chelan County PUD and its consultant. This form shall include isolated occurrence number, legal location, GPS location, date, name of recorder, description of the artifact, drawing of the artifact, and a notation of whether the artifact was collected. All isolated occurrences shall be identified on USGS 7.5 minute quadrangle maps and photographs of the artifact and a general overview of its location.

All sites shall be mapped using the site datum as a mapping point as well. GPS shall be taken on the location of the site datum. At least two additional GPS readings shall be obtained from the edges of sites larger than 20 m in length. Site forms acceptable to the OAHF shall be used to record site data.

Detailed information on landforms, general topography, and site sediments shall be documented. Site materials shall be recorded in terms of overall site density (i.e., artifacts/m²) and specific density (artifacts/1m²). Information on chipped stone raw materials shall be recorded in terms of ratios (i.e., 10 percent obsidian, 80 percent ccs, 10 percent basalt) or actual numbers if there are less than 100 items on the site surface. A sample block measuring 1 x 5 m shall be used to record lithic densities and raw material data on sites where there are more than 100 items otherwise all materials shall be documented. Descriptions of all features shall be complete and comprehensive. A photograph of each recorded feature shall accompany the site form. Photographs of each site should include two views from different directions and should include location of site datum (for example, placing a stadia rod above the datum for each site photo should suffice). Photo points shall be identified on the site map.

All site forms shall include a comprehensive and complete descriptions of the attributes found on the site form. A USGS map showing the site location shall be included with each site form along with a site sketch map. Site sketch maps shall generally be drawn to the same scale for the entire project area using graph paper scaled at 1:10. Prehistoric site maps will be drawn to scale using metric measurements and Historic period sites and features shall be recorded in feet and inches. All site maps shall include topographic features outside of the site area, the PUD easement or property boundary lines, distance to the Columbia River, locations and distances to nearby streams or other general landmarks (if appropriate). Any diagnostic artifacts that are identified or collected from a site during the inventory shall be drawn on the site form or supplemental sheet to be attached to the site form. All identified diagnostic artifacts shall also be photographed and the photographs shall be attached to the site form.

Site interpretations and assessments, even if preliminary, shall be included with each site form with justifications of these interpretations and assessments. Explain, for example why a site is or is not significant and what is meant by lithic scatter. The more description provided for each site, the better the interpretation and assessment will be. Some sites may be determined ineligible for inclusion on the NRHP based on survey data. A cover sheet form for SHPO concurrence that includes justification for ineligibility determinations shall be included with site forms.

During the course of the inventory phase, cutbanks shall be checked for exposures of previously undocumented cultural materials, whether prehistoric or historic in nature. Identifications of

volcanic ash layers shall be included in survey notes and locations of volcanic ash layers shall be included on USGS maps.

Any cutbanks that include site materials shall be examined and if possible a stratigraphic drawing of the cutbank that includes cultural material or features or significant non-cultural characteristics shall be included with the site form. A description of the stratigraphic drawing and its contents will be included.

Shovel tests shall be conducted on erosional sites or in areas that have been identified as potentials for development. However no shovel tests shall occur on private property. Shovel tests that are conducted shall be 50 cm by 50 cm in size and deep enough to document non-cultural sediments or to document the presence of cultural materials. All shovel test materials shall be screened onto plastic cloth so that the sediment may be easily returned to the shovel test hole following completion of the excavation. If at all possible shovel test holes shall be examined and described such that sediments within shovel tests are detailed. At each site where there is not a cutbank available for sediment descriptions that relate to the site, at least five shovel tests shall be excavated to determine site boundaries and depth of cultural materials or potential cultural materials. One shovel test shall be excavated at or near the center of the site and the others shall be near the perceived site boundaries.

All shovel tests that are conducted shall be screened through 1/8-inch hardware cloth for prehistoric sites and 1/4-inch hardware cloth for historic-era sites. All materials recovered from shovel tests shall be bagged by shovel test and site with the appropriate location information and bag contents recorded for each shovel test. A Shovel Test Form shall be included with each site and as an appendix for the inventory report. If shovel tests are excavated and no site is documented, then the appropriate forms still must be completed and included. All shovel tests will be indicated on site maps and on USGS maps. All shovel tests shall be backfilled and the surface returned to a natural state (for example the sod layer should be replaced on top of the backfilled shovel test).

All site and isolated occurrence forms shall be submitted to the Chelan PUD on a weekly basis, beginning the first week sites and isolated occurrences are recorded, for review prior to completion of the field work. In that way, if there are any questions or concerns about sites and isolated occurrences or the paperwork, these concerns can be addressed prior to the end of the field work. The Cultural Resources Working Group will conduct technical review of the first round of site forms.

The inventory report shall address the issues and concerns as stated in Section 5.1.1.4 above. The report shall include specific recommendations for future evaluations for each site and include preliminary interpretations and assessments with justifications for each category. The inventory report shall include a basic analysis of any collected materials and a discussion of the types of artifacts, artifact classes, and features found and documented at each location. The survey report shall include photographs and maps of the general project area, each site, and a representative sample of isolated occurrences.